



Public Service Commission of the District of Columbia
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Betty Ann Kane
Chairman

June 20, 2011

Ms. Sharon Gillett
Chief
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RE: NANC Recommendations on Resolution of the Telcordia Dispute

Dear Ms. Gillett:

This is to advise the Federal Communications Commission ("Commission") that the members of the North American Numbering Council ("NANC"), at its December 16, 2010 meeting, could not reach consensus on all of the recommendations of the Telcordia Dispute Resolution Team.

The Telcordia dispute concerns whether the Uniform Resource Identifier ("URI") fields in Change Orders NANC 429 (Voice), NANC 430 (MMS), and NANC 435 (SMS) that were approved by the NANC's Local Number Portability Working Group ("LNPA WG") for inclusion into the Number Portability Administration Center ("NPAC") database meet the requirement of 47 C.F.R. § 52.25(f) that the URI fields in the NPAC database "shall be limited to the information necessary to route telephone calls to the appropriate telecommunications carriers."

On May 26, 2009, Telcordia Technologies, Inc. ("Telcordia") filed a Request for Dispute Resolution with the former NANC Chair, Tom Koutsky. In its Request, Telcordia asserted that the Change Orders were improperly adopted by the LNPA WG because there was no express determination made by the NANC or the Commission that the URI fields being added to the NPAC database meet the aforementioned requirement under 47 C.F.R. § 52.25(f).

In July 2009, pursuant to 47 C.F.R. § 52.11 and 47 C.F.R. § 52.26, the NANC initiated a formal dispute resolution process with a Dispute Resolution Team lead by NANC Chair Koutsky, and Alternate NANC Member, Don Gray of the Nebraska Public Service

Commission and myself. Upon the departure of Tom Koutsky from the NANC in August 2009, Don Gray and I continued the task of investigating the Telcordia Dispute and composing a report on the findings and recommendations on the matter for consideration by the NANC. (Attached is a copy of the October 22, 2010 Memo of Findings and Recommendations from the Telcordia Dispute Resolution Team that was presented at the October 22, 2010 NANC meeting and reviewed at the December 16, 2010 NANC meeting.)

The Dispute Resolution Team concluded, and the NANC members concurred with such conclusion, that the NANC membership itself had not previously made a specific consensus determination that the URI fields in Change Orders 429, 430, and 435 were necessary to route telephone calls to the appropriate telecommunications carriers, as required by 47 C.F.R. § 52.25(f). The Dispute Resolution Team recommended that the Commission issue a Notice of Proposed Rulemaking to define "telephone calls", as utilized in 47 C.F.R. § 52.25(f), in order to provide clarity regarding whether the URI fields in Change Orders 429, 430, and 435 are necessary and "that the URI fields in question not be activated at this time."; however, there was not concurrence by the NANC membership. A substantial majority of the NANC membership indicated that they believe the URI fields are necessary; however, a significant minority believes that they are not necessary. This was evidenced at the December 16, 2010 NANC meeting by the presentation of two different proposed drafts of the NANC "Report and Recommendation" which were prepared by informal subgroups of NANC members (See Attached: "Report and Recommendation on Request of Telcordia Technologies, Inc. to Resolve Dispute Concerning NANC Change Orders 429, 430, and 435", prepared without attribution by Sprint and T-Mobile; and "NANC Report and Recommendation on the Dispute Over Change Orders 429, 430 and 435", prepared by NCTA, Comcast and Cox Communications.).

Please feel free to contact me (since Don Gray is no longer a NANC Alternate due to the departure of NANC Member Ann Boyle, Commissioner, Nebraska Public Service Commission) if you or members of your staff have any questions regarding the Telcordia Dispute Resolution Team's recommendations.

Sincerely,



Betty Ann Kane
Chairman
North American Numbering Council

Attachments (3)

cc: Ann Stevens, FCC
Marilyn Jones, FCC
NANC Members