North American Numbering Council

c/o Phoenix Center for Advanced Legal and Economic Public Policy Studies
5335 Wisconsin Ave., N.W., Suite 440
Washington, DC 20015-2034

October 10, 2006

Mr. Thomas Navin
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Timeline for pANI Administration Permanent Solution Recommendation

Dear Mr. Navin:

On September 8, 2006, the Bureau adopted interim guidelines and appointed an interim administrator for the pseudo Automatic Number Identification ("pANI") codes that are used to route emergency calls.[1] In that September 8 letter, the Bureau also stated that "a permanent solution to this issue will best serve the public interest." As a result, the Bureau requested that the North American Numbering Council ("NANC") inform the Bureau, "no later than October 10, 2006, as to the date the NANC will recommend to the Bureau such a permanent solution."[2]

In response to the Bureau's letter, a pANI Issue Management Group ("IMG") was constituted to review the work that had been done by a similar IMG in 2005 and early 2006. It is the judgment of this pANI IMG that NANC should be in a position to recommend a permanent solution, including final technical guidelines that have been sufficiently developed and approved by the industry, by April 1, 2007. I have attached a timeline which demonstrates the steps that are required to reach this recommendation.

To summarize, the timeline anticipates that NANC will adopt Recommendations for Final Guidelines in November 2006. The pANI IMG has begun to work on those Recommendations, and, once adopted by the NANC, those Recommendations will then be considered by the ATIS Industry Numbering Committee ("INC"). INC will, in consultation with the ATIS Emergency Services Interconnection Forum (ESIF), the National Emergency Number Association ("NENA"), and other industry groups,

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1 Letter from Thomas J. Navin, Chief, Wireline Competition Bureau, Federal Communications Commission, to Thomas M. Koutsky, Chair, North American Numbering Council, and Amy L. Putman, Director, Number Pooling Services, NeuStar, Inc. (Sept. 8, 2006).

2 *Id.* at 2.

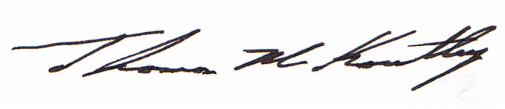
turn these recommendations into draft Final Guidelines beginning December 2006 and the first two months of 2007. We anticipate that the draft Final Guidelines will be a detailed, technical document that will allow for the effective and efficient administration of pANI resources on a permanent basis. We also expect to consult with the interim administrator over the next few months, as NeuStar's real-world experience in performing under the Interim Guidelines adopted by the Bureau may indicate areas where changes in the permanent solution might be warranted. Upon receipt of INC's draft Final Guidelines, we expect that the NANC will be in a position to recommend a permanent solution to the Bureau by April 1, 2007.

Of course, this timeline contains a number of moving parts and if we anticipate that a modification of the schedule is necessary, I will inform you promptly. In particular, it does not include development and completion of technical requirements for pANI administration that would be needed after the FCC decides upon a course of action. We anticipate that those efforts, if needed, would take an additional few months.

Please consider this letter to be NANC's approval of the attached timeline. This timeline was adopted by the pANI IMG, whose membership was open to all, and support for this timeline has already been expressed by a number of NANC Members. A draft of this letter and timeline was circulated to NANC members without objection. As a result, I am confident that NANC will formally approve this timeline at the first opportunity.

Please feel free to contact me if you or members of your staff have any questions.

Sincerely,



Thomas M. Koutsky
Chair, North American Numbering Council

Attachment (pANI Permanent Solution Timeline)

cc: Julie Veach, FCC
Renee Crittendon, FCC
Ann Stevens, FCC
Mary McManus, FCC
Maryln Jones, FCC
Deborah Blue, FCC
NANC and pANI IMG Members

Timeline pANI Guidelines Development

09/19/06 – 11/17/06	pANI IMG reconstituted, finalize NANC Recommendations for pANI Administration started by previous pANI IMG.
11/22/06	pANI IMG transmits NANC Recommendations for pANI Administration document to Chairman Koutsky.
11/30/06	NANC accepts NANC Recommendations for pANI Administration submitted by pANI IMG.
	NANC transmits NANC Recommendations for pANI Administration to INC for development of INC pANI Guidelines
12/01/06 – 03/02/07	INC establishes issue for development of INC pANI Guidelines and assigns to CO/Nxx subcommittee.
	CO/Nxx subcommittee, with direct participation by ESIF and NENA, develop INC pANI Guidelines.
03/09/07	INC pANI Guidelines posted to INC website and placed into Initial Closure (in time for March NANC meeting)
03/31/07 (estimate)	NANC endorses INC pANI Guidelines.
04/01/07	INC pANI Guidelines placed into Final closure if no changes/objections received
04/01/07	INC pANI Guidelines placed into Initial Pending status for FCC or other relevant approval