

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

December 4, 2006

Mr. Ken Havens
Chair, Industry Numbering Committee
Alliance for Telecommunications Industry Solutions
1200 G Street, N.W.
Suite 500
Washington, DC 20005

RE: Transmittal of NANC Recommendations for Permanent pANI
Administration

Dear Mr. Havens,

On November 30, 2006, the North American Numbering Council ("NANC") adopted the attached Recommendations for Permanent pANI Administration. As you know, this action was taken in response to a September 8, 2006 letter from the FCC Wireline Competition Bureau, which stated that "a permanent solution to this issue will best serve the public interest" and requested that the NANC recommend such a permanent solution.¹ The NANC resolved at its November 30 meeting to request that the ATIS Industry Numbering Committee ("INC") develop permanent pANI Guidelines that follow the Recommendations adopted by the NANC.

The ATIS INC's contribution to the NANC's task of recommending a permanent solution to the FCC expeditiously is important and critical, especially since pANIs affect the provision of emergency services to Americans. I truly appreciate the importance that the ATIS INC has placed on this issue and its commitment of substantial resources and attention by its members. As you know, ATIS INC was instrumental in developing the attached NANC timeline, which anticipates that the ATIS INC will post its proposal for pANI Guidelines by March 9, 2007.² The ATIS INC's completion of this request by that date is

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. Putnam, Director, Number Pooling Services, NeuStar, Inc. (Sep. 8, 2006) at 2.

² Letter from Thomas M. Koutsky, Chair, North American Numbering Council, to Thomas J. Navin, Chief, Wireline Competition Bureau, Federal Communications Commission (Oct. 10, 2006) (attached).

crucial to the NANC's commitment to recommend a permanent solution to the FCC by April 1, 2007.

The NANC also determined at the November 30 meeting that in drafting the permanent pANI Guidelines, the ATIS INC should consult with the interim pANI administrator, NeuStar, to make sure that the INC pANI Guidelines incorporate "lessons learned" from NeuStar's experience as an interim administrator.

I understand the tight timelines that the NANC has requested, and I offer you my personal assistance and attention to helping the ATIS INC meet these dates. I also understand that the ATIS INC operates by consensus. In the event that you determine that the ATIS INC may fail to achieve consensus with regard to any aspect of its proposed permanent pANI Guidelines that will prevent it from providing a consensus document by March 9, 2007, please contact me as soon as possible. Once again, I, on behalf of the NANC, appreciate your time and attention to this important matter.

Sincerely,



Thomas M. Koutsky
Chair, North American Numbering Council

Attachments:

NANC Recommendations for Permanent pANI Administration
October 10, 2006 Letter

cc: Julie Veach, FCC
Renee Crittenden, FCC
Marilyn Jones, FCC
Ann Stevens, FCC
Deborah Blue, FCC
NANC and pANI IMG Members
Adam Newman, ATIS INC Vice Chair
Jean-Paul Emard, ATIS