

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUL 24 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Numbering Resource Optimization

CC Docket No. 99-200

250

BELLSOUTH TELECOMMUNICATIONS, INC.EMERGENCY PETITION FOR PARTIAL WAIVER AND EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"),¹ by counsel and pursuant to Sections 1.3² and 1.46³ of the Commission's rules, respectfully requests that the Commission waive certain mandatory reporting requirements adopted in the *Numbering Resource Optimization Report and Order* ("NRO Order")⁴ in the above-captioned proceeding. Specifically, BellSouth requests that the Commission: (1) waive Section 52.15(f)(5)(i), which requires carriers to submit

¹ This petition is filed on behalf of BellSouth Telecommunications, Inc., an affiliated company of BellSouth Corporation, that provides wireline local telephone service. BellSouth Cellular Corp., a separate affiliate of BellSouth Corporation, will submit forecast and utilization data in accordance with the Commission's rules by the August 1, 2000 deadline.

² 47 C.F.R. § 1.3 ("Any provision of the rules may be waived by the Commission on its motion or on petition if good cause therefor is shown.).

³ 47 C.F.R. § 1.46.

⁴ *Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 00-104 (rel. Mar. 31, 2000) ("NRO Order" and "ENPRM").

utilization reports based on five number use categories;⁵ and (2) waive or extend the August 1, 2000 filing deadline⁶ for 90 days until November 1, 2000.

As described more fully below, special and compelling circumstances warrant grant of the requested relief. BellSouth will not be able to comply fully with the Commission's reporting requirements by the August 1 deadline, because it will not have the internal mechanization in place that will enable it to report data as prescribed in the *NRO Order*. BellSouth, however, expects to be able to provide Central Office Code (NXX) forecast data at the NPA level in compliance with Section 52.15(f)(4)⁷ by August 1. BellSouth also expects to be able provide modified utilization data as soon after August 1 as possible and, in any event, no later than November 1, 2000. Specifically, BellSouth plans to submit utilization data divided into three categories: (1) "assigned" (which will include administrative and some intermediate numbers); (2) reserved (which will include the remainder of intermediate numbers); and (3) aging.

I. A PARTIAL WAIVER IS WARRANTED.

BellSouth satisfies the "good cause" standard for grant of a waiver.⁸ Courts have held that "a waiver is appropriate only if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest."⁹ The Commission "may exercise its

⁵ 47 C.F.R. § 52.15(f)(5)(i).

⁶ *NRO Order*, ¶ 67; 47 C.F.R. § 52.15(f)(6)(i).

⁷ 47 C.F.R. § 52.15(f)(4).

⁸ See 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("The FCC has authority to waive its rules if there is 'good cause' to do so.").

⁹ *Northeast Cellular Telephone Co.*, 897 F.2d at 1166; see also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

discretion to waive a rule where particular facts would make strict compliance inconsistent with the public interest.”¹⁰

A waiver is justified under the standard articulated above. First, unique circumstances exist that would make strict application of the reporting rules inconsistent with the public interest. BellSouth’s existing legacy systems are not designed to accommodate the kind of data collection and reporting contemplated by the Commission in the *NRO Order*. For example, our systems cannot separately identify assigned, intermediate, and reserved numbers as required by the new rules. In order to meet these new specifications, BellSouth will have to develop, test, and install new software and replace the existing COSMOS¹¹ and ATLAS¹² network operations support systems. These changes are substantial and will require time to implement. Currently, BellSouth is scheduling upgrades that will accommodate the changes necessary to collect data as required by the Commission. BellSouth has already begun replacing the COSMOS legacy system with the new SWITCH system;¹³ and replacement of the ATLAS legacy system with the new CNUM¹⁴ system (which includes the companion Telephone Number Tracking System)¹⁵ will begin in 2001.

¹⁰ *Northeast Cellular Telephone Co.*, 897 F.2d at 1166 (citing *WAIT Radio*, 418 F.2d at 1159).

¹¹ COSMOS is an operations support system that inventories telephone numbers.

¹² ATLAS is an operations support system that assigns telephone numbers to business units.

¹³ SWITCH is an operations support system that inventories telephone numbers.

¹⁴ CNUM is an operations support system that inventories, selects, and administers telephone numbers. CNUM will ultimately replace COSMOS, SWITCH, and ATLAS.

¹⁵ Telephone Number Tracking System (TN Tracker) is a companion system to CNUM that provides reports, utilization and forecasts for telephone numbers.

In the interim, however, the only way that BellSouth could extract quantities of intermediate and administrative numbers from other assigned numbers would be through manual processes that are impractical in view of the volume of data being requested. Even with a manual effort, we will not be able to provide utilization data based on all five number use categories. At this time, our systems can extract utilization data based on only three categories: (1) "assigned" (which includes administrative and some intermediate numbers); (2) reserved (which includes the remainder of intermediate numbers); and (3) aging. In light of the foregoing, BellSouth requests that the Commission grant a partial waiver of its mandatory reporting requirements.

II. AN EXTENSION OF THE FILING DEADLINE WILL SERVE THE PUBLIC INTEREST.

BellSouth is also seeking a 90-day extension in order to file its modified utilization data. An extension is warranted because of the intensive manual effort required to collect and compile such a large volume of data from multiple legacy systems. With 7,800 NXXs in over 1,500 rate centers, BellSouth must report a total of approximately 400,000 data elements and 80,000 lines of data. Once the raw data is gathered, we will have to resolve discrepancies between the multiple systems and then summarize the data in an appropriate manner in order to populate FCC Form 502 (the Numbering Resource Utilization/Forecast Report). Completing an effort of this magnitude before August 1 is simply not possible. Thus, BellSouth respectfully requests that the Commission allow it to submit its modified utilization data as soon after August 1 as possible, yet no later than November 1, 2000. As indicated above, BellSouth intends to file its Central

Office Code (NXX) forecast data at the NPA level by the August 1 deadline to assist NANPA in revising its NPA exhaust projections using the most current data.

An extension of time to submit utilization data will not disrupt the reporting process. To the contrary, grant of the extension will allow the NANPA additional time to: (1) develop an appropriate system to collect, aggregate, and analyze carrier reports; (2) make any necessary changes to FCC Form 502; and (3) clarify any ambiguities regarding the reporting requirements or format. The end result will be more accurate and complete data provided in a more useful form.

These additional steps are important because the underlying purpose behind the mandatory reporting requirements is "to increase carrier accountability and incentives to use numbers efficiently."¹⁶ BellSouth is firmly committed to the goal of more efficient number usage and has been working diligently to implement the Commission's new rules. Nonetheless, as the record clearly demonstrates, compliance with the August 1, 2000 reporting deadline is in jeopardy for BellSouth as it is for much of the industry.¹⁷ Despite the efforts of all parties

¹⁶ *NRO Order*, ¶ 5.

¹⁷ A number of parties have submitted requests for an extension of the August 1, 2000 reporting deadline. *See, e.g.*, Qwest Corporation Request for Expedited Deferral of Effective Date or, Alternatively, a Waiver or Stay of Portions of Soon-To-Be Effective Rule 47 C.F.R. Section 52.15(f), CC Docket No. 99-200, at 6 (filed July 10, 2000) (extension until February 1, 2001 or "until a certain amount of time after the NANPA situation is worked through."); Motion for Extension of Time, filed on behalf of the Association for Local Telecommunications Services, the Competitive Telecommunications Association, and the Personal Communications Industry Association, CC Docket No. 99-200 (filed July 14, 2000) (90-day extension); Motion for Extension of Time, filed on behalf of Winstar Communications, Inc., CC Docket No. 99-200 (filed July 17, 2000) (120-day extension); Petition for Waiver and Extension of Time, filed on behalf of Cincinnati Bell Telephone Company, CC Docket No. 99-200 (filed July 20, 2000) (90-day extension); Petition for Temporary Waiver of 47 C.F.R. §§52.15(f)(6)(i) and 52.15(j), filed on behalf of VoiceStream Wireless Corporation, CC Docket No. 99-200 (filed July 20, 2000) (90-day extension).

involved – the Commission, the NANPA, and carriers – compressed time frames have made full compliance with the initial filing deadline problematic.

Even if carriers provide data to the NANPA to meet the August 1 deadline, such data is likely to come in different formats and categories than those prescribed by the Commission. The process for developing the new reporting form, making it available to the industry, and allowing carriers time to understand the complexities of the form has been harried. As a result, carriers will inevitably use different assumptions to satisfy the requirements as best they can. The absence of uniform reporting – one of the express goals of the Commission – will seriously undermine the validity of these initial reports.

Moreover, NANPA will not have the capability to meaningfully analyze the initial submissions. At a meeting of the North American Numbering Council (“NANC”) on June 20, 2000, a NANPA representative indicated that the NANPA would not complete the development of internal systems that would allow it to organize and analyze the utilization reports until some time after August 1, 2000. In the absence of this capability by the NANPA, BellSouth sees little, if any, value in retaining the August 1 deadline. An extension will not harm any interested party and, in fact, will serve the public interest by allowing carriers time to provide more accurate and complete data and by reducing the administrative burdens imposed upon the NANPA and the carriers.

CONCLUSION

In light of the foregoing, BellSouth respectfully requests that the Commission grant a partial waiver of its reporting requirements and extend the filing deadline to allow BellSouth

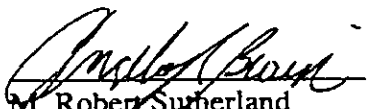
to submit modified utilization data as soon after August 1 as possible and, in any event, no later than November 1, 2000.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Its Attorneys

By:

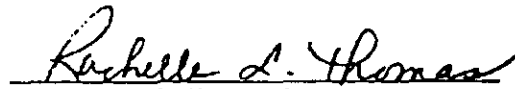


M. Robert Sutherland
Angela N. Brown
1155 Peachtree Street, N.E.
Suite 1700
Atlanta, GA 30309-3610
(404) 249-4839
(404) 249-3392

July 24, 2000

CERTIFICATE OF SERVICE

I do hereby certify that I have this 24th day of July, 2000, served the following parties to this action with a copy of the foregoing **BELLSOUTH TELECOMMUNICATIONS, INC. EMERGENCY PETITION FOR PARTIAL WAIVER AND EXTENSION OF TIME**, reference CC Docket No. 99-200, by hand delivery, Federal Express, or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.


Rachelle L. Thomas

**Via Hand Delivery*

***Via Federal Express*

Magalie Roman Salas, Commission Secretary*
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

International Transcription Service, Inc.*
1231 20th Street, NW
Washington, DC 20054

Jeanne Grimes*
Common Carrier Bureau
Federal Communications Commission
The Portals
6th Floor
445 12th St., SW
Washington, DC 20554

Lawrence E. Strickling, Chief*
Common Carrier Bureau
Federal Communications Commission
Suite 500H
445 12th Street, SW
Washington, DC 20554

Diane G. Harmon, Deputy Chief*
Common Carrier Bureau
Network Services Division
Federal Communications Commission
Suite 6-A207
445 12th Street, SW
Washington, DC 20554

L. Charles Keller, Chief*
Common Carrier Bureau
Network Services Division
Federal Communications Commission
Suite 6-A207
445 12th Street, SW
Washington, DC 20554

Yog R. Varma Deputy Chief *
Common Carrier Bureau
Federal Communications Commission
Suite 500H
445 12th Street, SW
Washington, DC 20554

Michael F. Altschul
Randall S. Coleman
Lolita D. Smith
Cellular Telecommunications Industry
Association
Suite 800
1250 Connecticut Avenue, NW
Washington, DC 20036

Peter Arth, Jr.
Lionel B. Wilson
Helen M. Mickiewicz
Attorneys for the Public Utilities Commission
State of California
505 Van Ness Ave
San Francisco, CA 94102

E. Barclay Jackson
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301

Maryland Office of People's Counsel
6 St. Paul St.
Suite 2102
Baltimore, MD 21202-6806

Gary Crabtree
Belton School District #124
Director Finance/Support Services
110 W. Walnut
Belton, MO 64012

Carol Ann Bischoff
Terry Monroe
Competitive Telecommunications Assoc.
1900 M Street NW
Ste. 800
Washington, DC 20036

Kathryn Marie Krause
QWEST Corporation
1020 19th St., NW, Ste. 700
Washington, DC 20036

Michael A. Sullivan
15 Spencer Avenue
Somerville, MA 02144

Norman D. Cunningham
Assistant Superintendent, Support Services
Cypress-Fairbanks Independent School District
12510 Windfern Road
Houston, TX 77064-3108

Maine Public Advocate
State House Station 112
Augusta, ME 04333

Howard J. Symons
Sara F. Seidman
Amy L. Bushyeager
Counsel for AT&T Corp.
Mintz, Levin, Cohn, Ferris
Glovsky and Popeo, PC
701 Pennsylvania Ave, NW, Ste. 900
Washington, DC 20004

Jay C. Keithley
Attorney for Sprint Corporation
401 9th Street, NW
Ste. 400
Washington, DC 20004

Sandra K. Williams
Attorney for Sprint Corporation
6360 Spring Parkway
Mailstop: KSOPHE0302-3D203
Overland Park, KS 66251

Jack A. Holzer
Communications Services Manager
Johnson County Sheriff's Office
125 North Cherry Street
Olathe, KS 66061

Lisa L. Karstetter
Programmer/Telecomm Analyst
City of Olathe, Kansas
P.O. Box 178
100 West Santa Fe Drive
Olathe, KS 66061

Emprise Bank
3900 W Central Ave
Wichita KS 67203-4987

R. Gregg Reep, Mayor
The City of Warren
P.O Box 352
Warren, Arkansas 71671

Florida Office of Public Counsel
c/o Florida Legislature
111 West Madison Street, #812
Tallahassee, FL 32399-1400

Indiana Office of Utility Consumer Counsel
100 N. Senate Avenue, Room N501
Indianapolis, IN 46204-2215

J. G. Harrington
Laura Roecklein
Counsel for Cox Communications Inc.
Dow, Lohnes & Albertson PLLC
1200 New Hampshire Ave, NW
Ste. 800
Washington, DC 20036

George N. Barclay
Michael J. Ettner
General Services Administration
1800 F Street, NW, Room 4002
Washington, DC 20405

Susan M. Eid
Richard A. Karre
MediaOneGroup, Inc.
1919 Pennsylvania Ave, NW, Ste. 610
Washington, DC 20006

John M. Goodman
Attorney for Verizon
1300 I Street, NW
Ste. 400 West
Washington, DC 20005

Jean Dols
Interim C.I.O.
Harris County Hospital District
P.O. Box 66769
Houston, Texas 77266

Lawrence G. Malone
Public Service Commission
of the State of New York
Three Empire State Plaza
Albany, NY 12223-1350

John W. Hunter
Lawrence E. Sarjeant
Linda L. Kent
Julie E. Rones
Keith Townsend
United States Telecom Association
1401 H Street, NW, Suite 600
Washington, DC 20005

M. Susan Savage, Mayor
Office of the Mayor
City of Tulsa
200 Civic Center
Tulsa, Oklahoma 74103

Jennifer Fagan
Office of Regulatory Affairs
Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, TX 78711

David Cosson
John Kuykendall
Counsel for Rural Independent Competitive Alliance
Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, Ste. 520
Washington, DC 20037

Texas Office of Public Utility Counsel
1701 North Congress Ave., Ste. 9-180
P.O. Box 78701
Austin, TX 78701

Louise M. Tucker
Telcordia Technologies, Inc.
2020 K Street, NW
Suite 400
Washington, DC 20006

Joseph Assenzo
Sprint PCS
4900 Main Street, 11th Floor
Kansas City, Missouri 64112

Michael S. Slomin
Telcordia Technologies, Inc.
445 South Street, MCC-1J130R
Morristown, NJ 07960

Judith St. Ledger-Roty
Todd D. Daubert
Jennifer Kashatus
Counsel for Personal Communications Industry Assoc.
Kelley Drye & Warren LLP
1200 19th St., Ste. 500
Washington, DC 20036

Leon Kestenbaum
Counsel for Sprint
401 9th Street, NW, Suite 400
Washington, DC 20004

Sue Frank, Mayor
Raytown
10000 East 59th Street
Raytown, Missouri 64133

Henry G. Hultquist
Mary De Luca
Chuck Goldfarb
Mark T. Bryant
MCI WorldCom, Inc.
1801 Pennsylvania Ave, NW
Washington, DC 20006

John S. DiBene
Roger K. Toppins
Alfred G. Richter, Jr.
Attorneys for SBC Communications Inc.
1401 I Street, NW, Ste. 1100
Washington, DC 20005

James S. Blaszk
Counsel for Ad Hoc Telecommunications
Users Committee
Levine, Blaszk, Block & Boothsby LLP
2001 L Street, NW
Ste. 900
Washington, DC 20036

Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr.
AT&T Corporation
295 North Maple Ave
Room 1130M1
Basking Ridge, NJ 07920

Jonathan M. Chambers
Vice President-Federal Regulatory Affairs
Sprint PCS
401 9th Street, NW, Suite 400
Washington, DC 20004

Marlene L. Johnson
Chairperson
District of Columbia
Public Service Commission
717 14th St., NW
Washington, DC 20005

Peggy Arvanitas
P.O. Box 8787
Seminole, FL 33705

James Bradford Ramsay
National Association of Regulatory
Utility Commissioners
1101 Vermont Avenue, NW
Suite 200
Washington, DC 20005

Teya M. Penniman
Attorneys for Oregon Public Utility Commission
Room 330
550 Capitol Street, NE
Salem, OR 97310-1380

Michael B. Adams, Jr.
Benjamin H. Dickens, Jr.
Attorneys for Midvale Telephone Exchange, Inc.
Northeast Louisiana Telephone Company, Inc.,
Interstate Telecommunications, Inc. Interstate
Telecommunications Cooperative, Inc. and Radio
Paging Service
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, NW
Washington, DC 20037

Jonathan M. Askin
Teresa K. Gaugler
Association for Local Telecommunication Services
888 17th St., NW, Ste. 900
Washington, DC 20006

Richard Askoff
Joe A. Douglas
National Exchange Carrier Association, Inc.
80 South Jefferson Road
Whippany, NJ 07981

Missouri Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Pennsylvania Office of Consumer Advocate
555 Walnut street
54th Floor, Forum Place
Harrisburg, PA 17101

Robert L. Hoggarth
Harold Salters
Personal Communications Industry Association
500 Montgomery St., Ste. 700
Alexandria, VA 22314-1561

Jonathan E. Canis
Todd D. Daubert
Counsel for 2nd Century Communications, LLP
Kelley, Drye & Warren LLP
1200 19th St., Ste. 50
Washington, DC 20036

Cynthia B. Miller
Bureau of Intergovernmental Liaison
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399

Robert J. Aamoth
Todd D. Daubert
Attorneys for Competitive Telecommunications
Association
Kelley, Drye & Warren LLP
1200 19th St., Ste. 500
Washington, DC 20036

Joel H. Cheskis
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101

John T. Scott, III
Vice President and Deputy General Counsel-
Regulatory Law
Verizon Wireless
1001 Pennsylvania Ave, NW
Washington, DC 20004

Marsha N. Cohan
Professor of Law
Hastings College of the Law
University of California
200 McAllister Street
San Francisco, CA 94102

Robert Foosaner
Lawrence R. Krevor
Laura L. Holloway
James B. Goldstein
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, VA 20191

L. Marie Guillory
Daniel Mitchell
National Telephone Cooperative Assoc.
4121 Wilson Blvd., 10th Floor
Arlington, VA 22203

Marc D. Poston
Missouri Public Service Commission
Room 750, 301 West High Street
Jefferson City, MO 65101

Elizabeth H. Liebschutz
State of New York Dept. of Public Service
Three Empire State Plaza
Albany, NY 12223

The Office of People's Counsel
District of Columbia
1133-15th Street, NW
Suite 500
Washington, DC 20005

Brian Thomas O'Connor
Robert A. Calaff
Voicestream Wireless Corporation
1300 Pennsylvania Ave, NW, Ste. 700
Washington, DC 20004

The Utility Reform Network
711 Van Ness Avenue, Suite 350
San Francisco, CA 94102

James U. Troup
Robert H. Jackson
Attorneys for Iowa Telecommunications Services, Inc.
Arter & Hadden LLP
1801 K Street, NW, Ste. 400K
Washington, DC 20006-1301

Trina Bragdon, Esq.
Maine Public Utilities Commission
242 State Street
State House Station-18
Augusta, ME 04333

Deanne M. Brutts
Frank B. Wilmarth
Bohdan R. Pankiw
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

James D. Mullins
Emergency Medical Services Authority
1417 North Lansing Avenue
Tulsa, OK 74106

Russell C. Merbeth
Daniel F. Gonos
Winstar Communications Inc.
1146 19th St., NW
Washington, DC 20036

Richard W. Rindler
Jeanne W. Stockman
Counsel for Allegiance Telecom, Inc.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007

Douglas I. Brandon
AT&T Wireless Services, Inc.
1150 Connecticut Services, Inc.
Suite 400
Washington, DC 20036

Lawrence Ausubel, Co-President
Peter Cramton, Chairman
Paul Milgrom, Co-President
Counsel for Maine Public Utilities Commission
Spectrum Exchange Group, LLC
2920 Garfield Terrace, NW
Washington, DC 20008

Richard W. Rindler
Ronald W. Del Sesto, Jr., Esq.
Counsel for RCN Telecom Services, Inc.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007

Cheryl A. Tritt
Frank W. Krogh
Counsel for NeuStar, Inc.
Morrison & Foerster LLP
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006-1888

Charles Ghini
Deputy Chief Information Officer
State Technology Office
Florida Department Management Services
4030 Esplanade Way, Suite 180
Tallahassee, FL 32399-0950

California Office of Ratepayer Advocates
505 Van Ness Ave., Room 4202
San Francisco, CA 94102

Brian Conboy
Thomas Jones
Counsel for Time Warner Telecom
Willkie Farr & Gallagher
Three Lafayette Center
1155 21st St., NW
Washington, DC 20036

Daniel Gonzalez
R. Gerard Salemmme
Esther Northrup
Nextlink Communications Inc.
1730 Rhode Island Ave, NW
Ste. 1000
Washington, DC 20036

Daniel M. Waggoner
Robert S. Tanner
Dale Dixon
Davis Wright Tremaine LLP
1500 K Street
Washington, DC 20005

Benjamin H. Dickens, Jr.
Gerard J. Duffy
Michael B. Adams, Jr.
Counsel for Autopage, Inc. and Radio Paging Service;
Counsel for Blackfoot Telephone Cooperative,
Inc., et al.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, NW
Washington, DC 20037

Michael D. McVicker, Assistant Director
Telecommunication Services Division
State of Washington
Department of Information Services
Olympia, Washington 98504-2445

Jodi J. Bair
Assistant Attorney General
Counsel for Public Utilities Commission of Ohio
Public Utilities Section
180 E. Broad Street, 7th Floor
Columbus, OH 43215

Jeri A. Semer, CAE
Executive Director
ACUTA
152 W. Zandale Dr., Suite 200
Lexington, KY 40503

Jeffery S. Linder
Daniel J. Smith
Counsel for ACUTA-The Association for
Telecommunications Professionals in Higher
Education
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006-2304

James R. Hobson
Counsel for The National Emergency Number
Association ("NENA") and National
Association of State Nine One One
Administrators ("NASNA")
Miller & Van Eaton, PLLC
1155 Connecticut Avenue, NW, Ste. 1000
Washington, DC 20036-4306

Sylvia Lesse
John Kuykendall
Counsel for Rural Cellular Association
2120 L Street, NW, Suite 520
Washington, DC 20037

John McHugh
Technical Director
21 Dupont Circle, NW
Suite 700
Washington, DC 20036