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CC Docket  
92-237  
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2 May 1997

Dr. H. Gilbert Miller  
Vice President  
Center for Telecommunications and Advanced Technology  
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hgmiller@mitretek.org

Mr. Alan Hasselwander  
Chair, North American Numbering Council  
c/o  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

RECEIVED  
MAY 22 1997  
Federal Communications Commission  
Office of Secretary

Dear Mr. Hasselwander:

Please find enclosed the requested redacted copy of the Mitretek Response to the North American Numbering Council Requirements Document. If you have any questions regarding any aspect of our response or if I may be of further assistance, please do not hesitate to contact me.

Sincerely,

Innovative Technology  
in the Public Interest

H. Gilbert Miller

HGM/dm

Enclosure

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2



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**Dr. H. Gilbert Miller**  
Vice President  
Center for Telecommunications and Advanced Technology  
703.610.2900 (voice) 703.610.2303 (fax)  
hgmill@mitretek.org

3 April 1997  
MS020-97-P0257

Mr. Alan Hasselwander  
Chair, North American Numbering Council  
c/o  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Mr. Hasselwander:

Mitretek Systems is pleased to respond to the Requirements Document issued by the North American Numbering Council (NANC). We believe that our proposal provides a complete and innovative approach to North American Numbering Plan (NANP) Administration. We fully comply with all requirements and take no exceptions to the Requirements Document.

In addition to the requested response, we have also enclosed instructions for interested evaluators to examine the Mitretek Web site for NANP Administration. The enclosed instructions include the security access required to view this site. This Web site is the external interface to the NANP databases that we discuss in our proposal.

*Innovative Technology  
in the Public Interest*

Mitretek will submit, in accordance with the NANC's schedule, a redacted version of this proposal per Section 2.1 of the Requirements Document. Until the redacted version is provided, Mitretek requests that all information contained in this proposal be treated as confidential information and only disclosed to persons working as part of the NANC or associated working groups.

Mr. Alan Hasselwander  
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Mitretek appreciates this opportunity to provide the NANC with our proposal for the administration of this critical numbering resource. We look forward to working with all NANP member countries and the telecommunications industry to make this initiative a complete success. Mitretek is ready at any time to answer questions or further discuss any aspect of our proposal. If we can be of further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Gilbert Miller". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

H. Gilbert Miller

HGM/dm

Enclosure

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

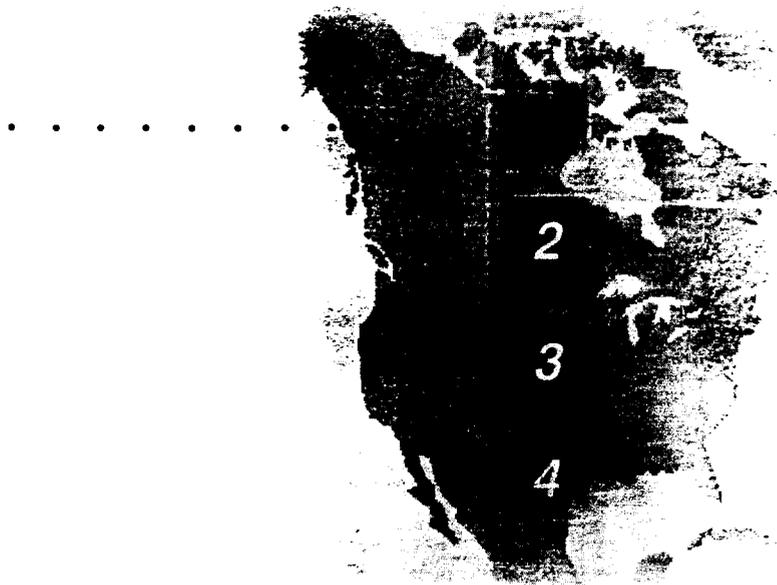
[REDACTED]

# PROPOSAL

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Cover Page . . . . .

*April 1 9 9 7*



**NORTH AMERICAN NUMBERING COUNCIL**  
**North American Numbering Plan Administration**

**Cover Page**

RESPONDENT INFORMATION

**Respondent Organization:** Mitretek Systems, Incorporated

**Respondent Contact Name:** Dr. H. Gilbert Miller  
Vice President  
Center for Telecommunications and  
Advanced Technology

**Address:** 7525 Colshire Drive  
McLean, VA 22102

**Telephone Number:** (703) 610-2900

**Facsimile Number:** (703) 610-2303

**Date:** 3 April 1997

**Duly Authorized Respondent  
Representative Signature:**



A handwritten signature in black ink, appearing to read "H. Gilbert Miller", is written over a horizontal line.

# Proposal Overview . . . . .

*April 1 9 9 7*



**NORTH AMERICAN NUMBERING COUNCIL**  
**North American Numbering Plan Administration**

## Proposal Overview

PROPOSAL OVERVIEW

This section summarizes all key features of the Mitretek proposal. Mitretek will perform all North American Numbering Plan (NANP) Administration activities with Mitretek employees. We will not use subcontractors. Mitretek takes no exceptions or deviations from the Requirements Document.

Mitretek complies with all of the provisions of the Requirements Document, as discussed in the remainder of this proposal. Mitretek, by stating compliance to the requirements in this Requirements Document, agrees that we have read and understood the requirement and that compliance is complete and deliverable at no additional cost unless otherwise noted.

Mitretek identifies our willingness to accept a recommendation that will assign to us the administration of Part 1—North American Numbering Plan Administrator (NANPA) and Central Office Code Administration (COCA) only.

## **Proposal Overview**

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MITRETEK'S COMMITMENT TO THE FCC AND NANC

### **Mitretek's Commitment to the FCC and NANC**

Mitretek Systems, Incorporated is pleased to respond to the North American Numbering Council's (NANCs) Requirements Document for the administrative functions associated with the North American Numbering Plan (NANP). Our corporate characteristics as an independent, not-for-profit, non-stock corporation with no affiliations with any telecommunications service providers will ensure that North American Numbering Plan Administration (NANPA) and Central Office Code Administration (COCA) functions are provided in a total corporate environment free from external market- and profit-related influences. Our corporate telecommunications and numbering plan capabilities, as well as our experience in developing mission-critical systems, will ensure that the critical industry need for numbering resources is met in an accurate, reliable, and timely manner.

The complete Mitretek approach is built on the solid foundation of the current guidelines established by industry. We offer a modern, information technology-based, and analytically sophisticated approach to numbering plan administration as demanded by the rapidly changing telecommunications industry. Our information systems that will support the provision of reliable and timely NANPA and COCA functions are already being brought on-line.

## **Proposal Overview**

MITRETEK'S COMMITMENT TO THE FCC AND NANC

We will establish a new corporate division to operate as the NANP Administrator, and to assist the NANC in achieving its goals and objectives related to administration of the NANP. This corporate division will be dedicated exclusively to the NANP Administration and will be led by an experienced senior management team of existing Mitretek managers and recognized numbering plan professionals. Further recognizing the importance of the NANP Administration, the Mitretek NANP Administration Director will report directly to the Mitretek Vice President for Telecommunications and Advanced Technology, who is an officer of the corporation. We have already retained professionals experienced in numbering plan and code administration to complement our existing professionals experienced in telecommunications systems.

We propose to distribute the NANP Administration functions over five locations to obtain the efficiencies of consolidating functions, as well as to ensure necessary local knowledge and responsiveness to the industry. Our approach will provide for a successful, smooth, and early implementation of the NANPA and COCA functions.

Mitretek has given the administration of the NANP our highest priority. We are prepared to work with the NANC and to be accountable for the administration of the NANP. We are committing all corporate resources—staff, management, technical capabilities, facilities—to ensure the NANP Administration's success.

## Proposal Overview

MITRETEK'S COMMITMENT TO THE FCC AND NANP

“Access to numbering resources is critical to entities desiring to participate in the telecommunications industry. Numbers are the means by which businesses and consumers gain access to, and reap the benefits of the public switched telephone network.

These benefits cannot be fully realized, however, unless numbering resources of the NANP are administered in a fair and efficient manner that makes them available to all parties desiring to provide telecommunications services.”

*Administration of the North American Numbering Plan*

Federal Communications Commission Report and Order

**The new Administrator will assist the North American Numbering Council in assuring that the North American Numbering Plan:**

- Facilitates entry into the communications marketplace by making numbering resources available on an efficient, timely basis to communications service providers.
- Does not unduly favor or disfavor any particular industry segment or group of consumers.
- Does not unduly favor one technology over another.
- Gives consumers easy access to the public switched telephone network.
- Ensures that the interests of all NANP member countries are addressed fairly and efficiently, fostering continued integration of the NANP across member countries.

## Proposal Overview

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MITRETEK SYSTEMS

### Mitretek Systems

Mitretek Systems, Incorporated is a not-for-profit, conflict-free, scientific research firm working exclusively in the public interest. Our corporate technical breadth includes the full range of telecommunications and information technologies. Throughout our history, we have assisted our clients in times of unique need. We have been called upon to bring to bear our combination of independent, conflict-free corporate posture, and knowledge of technology and industry to ensure competition-neutral, but informed and insightful, decisions. Our clients have sought us out and entrusted us to assist them in making multi-billion dollar, technology-related strategic, mission-critical, and acquisition decisions. The roles and responsibilities that our clients have entrusted to us are similar to those of the new North American Numbering Plan (NANP) Administrator.

Mitretek was formed in January 1996 following a decision by The MITRE Corporation Board of Trustees to divide the company into two independent organizations.

The new company, Mitretek, received the Center for Telecommunications and Advanced Technology, the Center for Information Systems, and the Center for Environment, Resources, and Space—over 700 staff—representing thousands of staff years of experience on programs for almost all major federal agencies, including the Departments of Treasury, Defense, Justice, State, Interior, Health and Human Services, Energy,

## Proposal Overview

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MITRETEK SYSTEMS

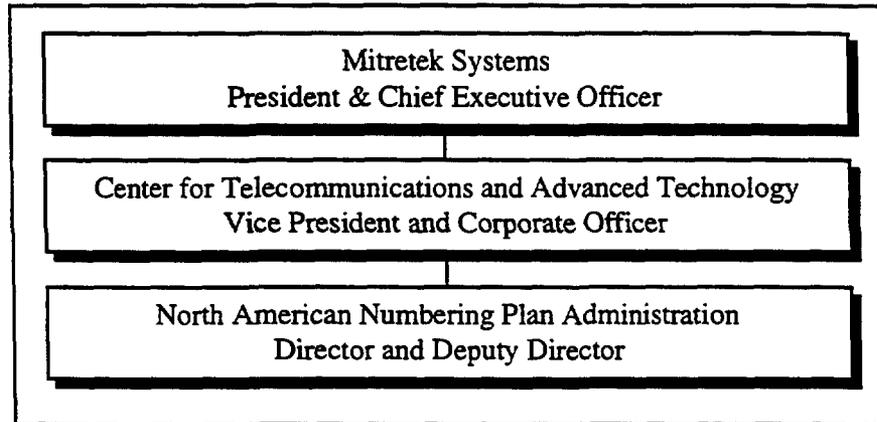
Transportation, Agriculture, Veterans Affairs, Commerce, and Labor, as well as the Central Intelligence Agency, General Services Administration, and Postal Service.

Working for federal, state, local, and international governments, as well as other public interest organizations, we have distinguished ourselves by providing innovative solutions to client problems and by demonstrating a track record of achieving significant performance and cost improvement for our clients. We have helped the federal government acquire telecommunications services and technology, negotiate below market telecommunications prices, and conduct leading edge telecommunications feasibility demonstrations. Our involvement, sponsorship, and leadership in many industry and government technology forums and standards bodies have provided our staff with experience in issues regarding new technology development, deployment, and availability. Our staff testify and provide expert inputs to many judicial, legislative, and regulatory settings. We have worked with many clients to design, develop, and implement large-scale and complex telecommunications, software, and database systems.

## Proposal Overview

MITRETEK SYSTEMS

*The Mitretek NANP Administration Will Report Directly to a Mitretek Corporate Officer*



As part of our system engineering support, we conduct quantitative analyses including economic, technology, and requirements forecasting. Through our engineering activities, we have developed skills in fostering consensus around technical, operational, policy, and procedural issues and solutions.

Our corporate experience also includes the institutional characteristics we believe are required of the new NANP Administration. We always have operated under a stringent set of constraints and business practices which offer advantages to our clients. Primary among these are neutrality, objectivity, and independence. Mitretek operates in the public interest, free from organization, profit, or market-related conflicts of interest. We have found that these constraints and business practices also provide us with unique access to

## Proposal Overview

MITRETEK SYSTEMS

### Mitretek's Traditional Roles and Experiences:

- In-depth knowledge of technology and telecommunications network operations
- Capability to act as an information resource for the industry concerning all aspects of technology
- Capability to design, develop, operate, and maintain the complex computer-based information systems, including hardware, systems and applications software, database, and associated communications networks
- Fundamental management skills to operate an effective and efficient organization
- Capability to manage proprietary data and competitively sensitive information
- Interpersonal communication and negotiation skills required to facilitate large numbers of diverse stakeholders and maintain effective relations with industry
- Project management skills to ensure the delivery of high-quality analytical studies, systems engineering designs, and regulatory decisions involving many diverse stakeholders Skills to explain complex scientific and technological issues to the public and media
- Resources to ensure that our derived solutions comply with applicable laws, regulations, and standards

proprietary information, as for-profit firms are willing to share sensitive information with us in the knowledge that the information cannot be used to their competitive disadvantage.

The administration of the NANP is a significant challenge. It is a challenge that requires telecommunications skills, understanding of numbering administration fundamentals, a dedication to a timely transition from the current incumbents, and consensus building among diverse market and technology interests. It also requires, according to the Federal Communications Commission (FCC) order, a "single, non-government entity that is not

## **Proposal Overview**

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MITRETEK SYSTEMS

closely identified with any particular industry segment;" one capable of performing numbering plan administration in a technology-neutral environment free from real or apparent conflicts of interest.

Mitretek Systems has these attributes and meets these requirements. ■

## Proposal Overview

THE NEW MODEL FOR NANP ADMINISTRATION

### The New Model for NANP Administration

The telecommunications industry in North America is, and will continue to be, in constant change. Once a static industry dominated by monopoly telecommunications service providers, the industry is now one of increasing expansion, competition, and innovation. New entrants arrive on what seems to be a daily basis to add new ideas and resources to the competitive mix. Traditional providers are shedding the bonds of regulation to adapt, evolve, and add their contributions to the wealth of services offered to the telecommunications public.

In this time of universally recognized change, the FCC recognized that *“changes in the structure of the telecommunications market make it appropriate to shift administrative responsibilities for all domestic numbering matters to a neutral entity. Increasingly, companies needing numbering resources are competitors for market share of the carriers that directly and indirectly control distribution of numbering resources.”*<sup>1</sup> The FCC and the industry recognized that shifting administration of the publicly-owned numbering resources not only benefited new entrants and freed the incumbents from perceptions of

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<sup>1</sup> *Administration of the North American Numbering Plan*, Report and Order, FCC Docket No. 92-237, 13 July 1995

## Proposal Overview

THE NEW MODEL FOR NANP ADMINISTRATION

bias, but also would improve the overall quality of the NANP since all parties would be willing to provide the proprietary data needed to effectively administer the finite number resource.

A new model for numbering plan administration was needed, one that:

- Facilitates easy entry into the telecommunications marketplace by making numbering resources available on an efficient, timely basis to service providers
- Does not unduly favor or disadvantage any particular industry
- Does not unduly favor one technology over another
- Gives consumers easy access to the public switched telephone network
- Ensures that the interest of all NANP member countries are addressed fairly and efficiently, and fosters continued integration of the NANP across NANP member countries
- Fosters international numbering consistency and interoperability

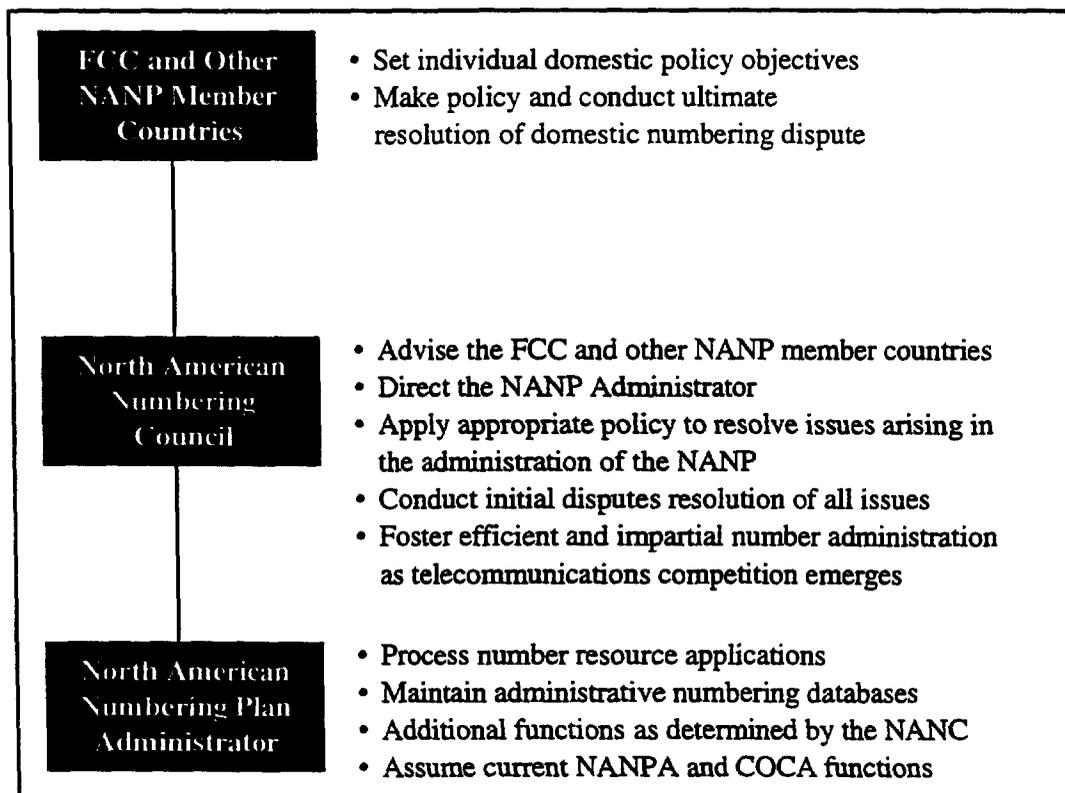
In developing the new model, the FCC recognized the need to involve all of the diverse parties interested in the numbering plan—new entrants and traditional providers in the industry, member country and state regulatory bodies, and the public. The FCC ensured that the complete industry voice would be heard when it created the North American

## Proposal Overview

THE NEW MODEL FOR NANP ADMINISTRATION

Numbering Council (NANC). The FCC also ensured that the needs of the local domestic user communities would be met when it consolidated Central Office Code Administration (COCA), including numbering plan area relief planning activities, into the new, neutral NANP Administration.

### *The new model for Numbering Plan Administration*



## Proposal Overview

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THE NEW MODEL FOR NANP ADMINISTRATION

The new model of numbering plan administration is one of shared responsibility. The new NANP Administrator has clear responsibility for processing number resource applications, maintaining administrative numbering databases, performing additional functions as determined by the NANC, and assuming current North American Numbering Plan Administration (NANPA) and COCA functions. ■

## Proposal Overview

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MITRETEK NEUTRALITY

### Mitretek Neutrality

Mitretek last year met, today meets, and in the future will continue to meet and exceed the neutrality requirements necessary to effectively administer and allocate public NANP resources. Neutrality is fundamental to the Mitretek corporate purpose of working in the public interest. Because the corporation is uniquely organized, we can ensure the NANC that there are no current or future neutrality problems requiring a cure caused by relationships with carriers or incentives of our managers and staff.

As the NANP Administration, Mitretek will operate:

- In the public interest with neutrality and objectivity
- As a not-for-profit, independent organization
- Free from any profit-, market-, or technology-related conflicts of interest
- Free from organizational conflicts of interest, whether real or apparent, financial or non-financial
- Free from any identification or affiliation with any telecommunications industry segment

## Proposal Overview

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 MITRETEK NEUTRALITY
 

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NANC Requirement:	Mitrotek Offers:
<ul style="list-style-type: none"> <li>• Not an affiliate of any telecommunications service provider</li> </ul>	<ul style="list-style-type: none"> <li>• Mitrotek has <u>no</u> associations or affiliations with any telecommunications service providers</li> <li>• Mitrotek is an independent corporation with no private ownership rights and no stock</li> </ul>
<ul style="list-style-type: none"> <li>• Not issue a majority of its debt or derive a majority of its revenues from any telecommunications service provider</li> </ul>	<ul style="list-style-type: none"> <li>• Mitrotek receives <u>no</u> revenue from any telecommunications service provider</li> <li>• Mitrotek debt, taken for the purpose of working capital, is held solely by commercial banks</li> </ul>
<ul style="list-style-type: none"> <li>• No undue influence by parties with a vested interest in the outcome of numbering administration</li> </ul>	<ul style="list-style-type: none"> <li>• Mitrotek has <u>no</u> relationships with and is subject to <u>no</u> undue influence by parties with a vested interest in the outcome of numbering administration</li> </ul>

Mitrotek is an independent, not-for-profit corporation that was formed to perform scientific and engineering services and to otherwise further the public interest. There are no private ownership rights in Mitrotek, and there is no stock. We work only for government agencies or other public interest entities. We do not have contractual relationships with telecommunications companies. We build many experimental models as a proof-of-concept stage in a systems development program; however, we do not manufacture hardware or software. By refraining from commercial activity, we maintain objectivity, allowing us to serve as an impartial link between our clients and competitive industry. As a result, other private sector, for-profit firms are willing to provide us access to proprietary technical, strategic, and financial data. ■

## Proposal Overview

MITRETEK NEUTRALITY

<b>FCC Order Requirement:</b>	<b>Mitretek Offers:</b>
<ul style="list-style-type: none"> <li>• Single, non-government entity</li> </ul>	<ul style="list-style-type: none"> <li>• Mitretek is a private sector, not-for-profit corporation chartered in the public interest.</li> <li>• All number plan NANPA and COCA functions will be performed by a Mitretek division reporting directly to a Mitretek corporate officer. We propose no subcontractors.</li> </ul>
<ul style="list-style-type: none"> <li>• Neutral third party that is not aligned with a particular industry segment</li> </ul>	<ul style="list-style-type: none"> <li>• Mitretek is an independent corporation with no private ownership rights and no stock.</li> <li>• Mitretek is chartered to and operates exclusively in the public interest.</li> <li>• No part of Mitretek's assets may inure to the benefit of private shareholders or individuals.</li> <li>• Mitretek has no affiliations or associations with any telecommunications provider; nor is Mitretek a telecommunications provider.</li> <li>• Mitretek works only for government agencies or public interest entities; no relationships with commercial firms.</li> </ul>
<ul style="list-style-type: none"> <li>• Freedom from Conflict of Interest—fair and impartial, non-discriminatory</li> <li>• Pro-competitive numbering plan administration, no perception or accusations of bias</li> <li>• Technology-neutral number administration</li> </ul>	<ul style="list-style-type: none"> <li>• We do not manufacture hardware or software.</li> <li>• Mitretek has stringent conflict of interest procedures to identify and prevent conflicts of interest.</li> <li>• Mitretek managers' performance is evaluated against technical quality, utility, and responsiveness metrics, not against a profit goal.</li> <li>• Mitretek managers do not make project-related decisions based on monetary gain for themselves, upper management, owners, or stockholders.</li> <li>• Mitretek employees are subject to stringent personnel policies and procedures.</li> <li>• We have arrangements for access to proprietary information with many industrial companies.</li> <li>• Mitretek staff support a wide variety of standards organizations and committees.</li> </ul>

## Proposal Overview

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### MITRETEK QUALITIES AND ATTRIBUTES

#### Mitretek Qualities and Attributes

Mitretek will provide the NANC-required NANP Administration qualities and attributes in one, or more, of four ways. The quality or attribute may be provided by:

- Capabilities that already exist in Mitretek
- Matrixed support provided by Mitretek support groups
- Recently acquired numbering plan professionals
- Continuation of our plan to acquire additional numbering plan professionals

In the fall of 1996, we began an initiative to retain additional staff capabilities prior to the delivery of our proposal to the NANC. The purpose was to add recognized numbering plan experts, thereby complementing Mitretek's existing recognized experts in telecommunications systems and computer-based information systems development.

We have already retained such recognized numbering plan experts, who are already working with us to prepare for implementation of the new NANP Administration.

Mitretek has a long history of developing and assisting in the operation of telecommunications systems. Recently, we have worked with our large telecommunications clients to develop strategies for purchasing services and technologies