

**Roberta E. Breden**  
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October 30, 1998

Ms. Magalie Roman Salas  
Secretary, Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, D.C. 20554

RECEIVED

EX PARTE OR LATE FILED  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte, In the Matter of CC Docket No. 88-57, Review of Sections 68.104 and 68.213 of the Commission's Rules Concerning Connection of Simple Inside Wiring to the Telephone Network, and RM-5643, Petition for Modification of Section 68.213 of the Commission's Rules filed by the Electronic Industries Association

Dear Ms. Salas:

This is to confirm that on October 16, 1998, the Telecommunications Industry Association (TIA) participated in a meeting with Commission staff attorney Vincent Paladini, Commission staff engineer Debra Harper, Commission staff engineer William Howden, and Deputy Chief Blaise Scinto, Network Services Division, Common Carrier Bureau, to discuss CC Docket No. 88-57, In the Matter of Review of Sections 68.104 and 68.213 of the Commission's Rules Concerning Connection of Simple Inside Wiring to the Telephone Network, and RM-5643, Petition for Modification of Section 68.213 of the Commission's Rules filed by the Electronic Industries Association.

Participating in the exchanges, in addition to Vincent Paladini, Debra Harper, William Howden, and Blaise Scinto, were Ronald Provost of Building Industry Consulting Services International, Charles Berestecky of Lucent Technologies, Roberta E. Breden, TIA staff, and other industry representatives listed on the attached attendance roster, on behalf of TIA.

The attached seven pages, which include a copy each of meeting minutes and the previously referenced attendance roster are provided in connection with the meeting.

Thank you.

Sincerely,

Roberta E. Breden

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**FCC and Industry Part 68 Administration  
Procedures Ad Hoc Working Group  
October 16, 1998 Meeting Notes**

**1. Introductions****Ron Provost/Group**

Ron Provost opened the 49th FCC and Industry Part 68 Administration Procedures Ad Hoc Working Group meeting. Attendees to the meeting were welcomed and an attendance list is attached. The following items were discussed at the meeting.

**2. Where We Are and Where We Are Going****Bill Howden**

Bill Howden discussed FCC Part 68 application processing and the need for a restructuring of the rules. The need for improving Part 68 application processing and rule structure is being driven by market windows for terminal equipment becoming shorter and the future introduction of Telecommunication Certification Bodies (TCBs). Bill noted that the FCC is looking at improving the processing of applications with on-line filings since the current processing of approximately 3,000 applications annually is manually intensive and resource dependent. A more timely response appears to be possible with on-line filings since approximately three weeks is now required to process applications. Bill mentioned that with TCBs processing applications in the future, the current process needs to be improved. There appears to be a need to review the current rule structure since a given subject may be treated several places in the CFR and the Guide.

**3. Rule Clarification****Group****a) May 19, 1999**

Questions have surfaced as to whether terminal equipment has to be re-registered to be in compliance with the May 19, 1999 harmonization effective date. Chuck Berestecky stated that any new equipment must meet the new rules; anything prior, if the product is changed, requires re-registration. Chuck expressed concern about requiring massive equipment changes. Ron Provost noted that after a date certain, equipment must meet the new rules. John Bipes noted that due to short product life cycles, if equipment is vulnerable to low power (Type B) surges, re-registration is required at some point. Ahn Wride suggested that the rules need to be clearer since they are not clear now. Bill Howden indicated that the FCC is looking into this item.

**b) HAC Labeling Requirements**

Bill Howden indicated that HAC labeling was not included in the Harmonization Order. He indicated the October Federal Register may include these requirements.

**c) ADSL/XDSL**

Ron Provost asked if ADSL/XDSL is covered under Part 68. Is a pulse template required? Is encoded analog content applicable? It was noted that the relaxation of Part 68 signal power requirements is the subject of a pending FCC Rulemaking. Trone Bishop indicated there appears to be a need for certain limits to prevent interference of next generation equipment. Chuck Berestecky noted that signal power requirements are complex and that sensitive services may have

to be excluded from certain binder groups on an administrative basis. It was noted that subloop unbundling is the subject of active discussion in the Section 706 FCC proceeding.

#### **4. Frequently Asked Questions**

**Bill Howden**

Bill Howden distributed to the Group a list of Part 68 Frequently Asked Questions(Q) and Responses(R) (attached). Discussion ensued on the best method to address Part 68 related questions that Bill encounters. Bill indicated that questions in the handout are representative of questions typically asked and resources are required to provide the proper responses. He further noted that rule clarification and Guide restructure may be a way to start. Ahn Wride mentioned forming TR41.9 subcommittees to address both technical and administrative questions. It was suggested that this type of information might be appropriate for the FCC or TIA to post on their Web sites.

#### **5. Administrative Issues**

**Bill Howden**

##### **a) Application Address Database**

Bill Howden noted there are thousands of records in the Application Address database that may require updating. Concern was expressed about how this might be accomplished.

##### **b) 730 Application Guide Revision**

It was suggested that members of this Group review the 730 Guide and provide suggestions for revision at the next meeting. Bill Howden indicated that the April 1998 version of the Guide had been reprocessed and is on the FCC Web.

##### **c) Test Lab Database**

Jim Hahnos noted the test lab has an active database with names on file.

##### **d) Industry Canada/FCC Application Harmonization**

Claude Beaudoin reviewed the Industry Canada/FCC Application Harmonization effort and indicated that the proposal is awaiting approval. He noted that certification bodies will be using the same form.

##### **e) Definitions**

Bill Howden suggested that we need to be careful using terms that we don't define (e.g., terminal equipment definition). There was discussion on carrying over the definition section of the Guide to Part 68.

##### **f) Future of Registration Database**

The future of the registration database was discussed and how it might be streamlined. The database is approximately eight years old. With the advent of TCBs, this issue is becoming increasingly important. On-line registration was suggested as a possibility for database updates

with resources being an issue. There appears to be interest in having internet access to the database.

#### 6. Electronic Filing

Jim Hahnes

Jim Hahnes presented a proposal for the electronic filing of FCC Part 68 applications for telephone registration (see attachment). The proposal includes developing a system based on the FCC equipment authorization system with FCC Form 730 being filled-out on-line. A FCC Part 68 registration number would be received at the conclusion of the electronic application "upload". The FCC fee form would be printable at the conclusion of the application up-load. Advantages of electronic filings include less errors, less paperwork, easier to maintain records, and the FCC reference room can be "on-line." In concluding, Jim mentioned additional requests that coincide with electronic filings include doing away with "notice applications" just to add model numbers and allowing grantees to "update" database by adding new number.

#### 7. TIA TR41.9 Update

Ahn Wride

Ahn Wride listed TR41.9 activities for the year including:

- The Part 68 biannual seminar held in February
- TSB31-B Part 68 Rationale and Measurement Guidelines issued in February
- Compilation of an errata sheet amending CO implemented payphone to provide technical requirements
- ADSL requirements relating to the New Technologies proceeding including a FCC series of roundtables
- TR41.9 formulating comments for the Signal Power NPRM
- TR41.9 taking a more responsive role involving Bill's questions

Chuck Berestecky, TR41 Chair, mentioned that he is looking at how TR41.9 operates and how it relates to ENC regulations. He noted there would possibly be realignment of committees within TR 41. He proposed that the Ad Hoc Group become part of the TR41 meetings. There was agreement with Chuck's proposal and this Group will now meet quarterly during the TR41 regular meetings beginning in February 1999.

#### 8. Regulatory Review

Vincent Paladini

Vincent Paladini discussed ongoing Commission activities related to Part 68. He noted the FCC has initiated a 1998 biennial regulatory review involving 34 proceedings. The Commission is attempting to determine which regulations are no longer necessary and plans to repeal or modify those unnecessary regulations. The Notice of Proposed Rulemaking involving 56 kilobits per second modems is included with the FCC looking at relaxing the signal power limitations contained in Part 68. Included in the review is the Office of Engineering and Technology streamlining of Part 15 requirements. Vincent further noted that the FCC is in the process of determining what changes are necessary to implement Mutual Recognition Agreements (MRAs). An exterior time limit means that changes in Part 68 have to be done quickly to match the MRAs. Vincent concluded by mentioning that there is an additional Rulemaking on electronic filings.

**9. New Business****Group****BICSI Petition**

Carol Matz stressed that inside wire is the weakest link in the network and that BellSouth has continued to urge Commission action on the BICSI Petition. Carol emphasized that the problem is continuing to grow and that substandard wiring is a national problem. The Petition has been pending for some time and there appears to be support from other parties such as GTE, Bell Atlantic, and TIA for the FCC adoption of a wire quality standard.

**Industry Meetings**

The Group expressed a need for continuing FCC Part 68 Industry Meetings. The Industry Meetings are a forum for the discussion of technological and industry issues related to Part 68. Bill Von Alven previously conducted these meetings at the FCC. Bill Howden agreed to continue these meetings.

**Field Trials**

Ahn Wride mentioned that at the last TR41.9 meeting a need for more formal field trial procedures was requested. TR41.9 brought up the need to combine the technical/marketing aspects of the trial. Ahn indicated there are problems at times in coordinating field trials due to changes in personnel and difficulties in making the appropriate contacts. Field Trial Coordinators Christine Huff and Jimmy Salinas emphasized that they are following established field trial procedures with several trials currently underway.

**Access Board Section 255**

Erik Hansson reminded the Group that the Access Board Section 255 requirements include telecommunications equipment that is used by people with disabilities. He further stated that the Access Board next meets in November and has six months to write standards. Roberta Broden noted that the requirements apply to equipment and software acquisitions by Federal Agencies. She further stated that this proceeding is on fast track and to contact Grant Sciffert at TIA if there are questions.

**10. Next Meeting****Ron Provost**

In closing the meeting, Ron Provost stated that the next meeting will be held on February 18, 1999 at Sarasota, Florida as part of the TIA meeting.

ATTENDANCE ROSTER



FCC Admin

Oct 16, 1998

Meeting Identification & Location

Date/s

TO ALL PARTICIPANTS: Subjects improper for consideration under the TIA "Legal Guides" shall not be discussed at this meeting or elsewhere. Excerpts from Legal Guides on reverse side. Consult the TIA Staff about any doubtful question.

✓ Please indicate any changes.

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3. Jimmy Salinas	Southwest Bell Telephone	6500 WEST LOOP SOUTH ZONES 3,4 BELLAIR TX 77401	713-567-8095 713-567-6133	JS5706@TXMAIL.SBC.COM <del>js5706@txmail.sbc.com</del>	
4. ANH WRIDE	COMMUNICATION CERTIFICATION LABORATORY	1940 WEST ALEXANDER ST. SLL, UT 84119	801-972-6140 801-972-8432	atw@ccfab.com	
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9. Blaise Scinto	F.C.C.	2000 M Street, NW Suite 2-35 Washington, DC 20554	202-418-1380 202-418-2345	b.scinto@fcc.gov	
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9. Jane ZAKUTANSKY	Lucent	600 Mountain Ave Knox 3D-430 Murray Hill, NJ 07974	908-582-5029  908-582-6255	JZAKUTANSKY@Lucent.com	
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3. Bill Howden	FCC	2000 M Street NW Room 210E Washington DC 20554	202 418 2343	Whowden@aol.com	
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8. Chuck Berestecky	Lucent	101 Crawford Corner Road Rm 41305 Holmdel, NJ 07733	732-949-9739 732-949-9763	chberstecky@lucent.com	
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10.					