

Sprint

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 29 2001

June 29, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

**Re: Changes to Toll-Free Number Administration System
CC Docket No. 95-155 and NSD File No. L-01-112**

Dear Ms. Attwood:

On December 7, 2000, the Chief of the Network Services Division sent a letter to the President of DSMI ("Keller-Wade Letter," DA 00-2754) directing that certain changes be made to the Disconnect Status and Suspend Status functions of the SMS/800 database in order to address alleged problems with slamming and number brokering. On February 2, 2001, the Network Services Division deferred the implementation date of those changes from February 3, 2001 to August 6, 2001 (DA 01-292). On June 22, 2001, the Commission released a Public Notice in the above-referenced proceedings (DA 01-1463) soliciting comment on the Keller-Wade Letter and on alternative solutions for preventing toll-free numbers from being transferred between subscribers. It is our understanding that DSMI is proceeding with software development work to implement the directives of the Keller-Wade Letter.

We believe that the record compiled in this proceeding will include industry recommendations to address toll-free number slamming and brokering which are significantly different than the approach set out in the Keller-Wade Letter. Should the Commission adopt these alternative recommendations, it would be a needless expenditure of resources to proceed with the software development work associated with implementing the Keller-Wade Letter.¹ Therefore, we request that the Commission promptly direct DSMI to cease all such development work pending a final decision by the Commission in NSD File No. L-01-112.

¹ The cost associated with the development work needed to implement the Keller-Wade Letter is likely to be significant. Although we are not privy to the costs quoted to DSMI by its software subcontractor, Telcordia, to accomplish this project, we would note that previous software changes have been surprisingly expensive. For example, it was revealed at a recent SNAC meeting that the cost of making what appears to be a minor change to the SMS news bulletin board (listing the most recent bulletins first, instead of last) would be approximately \$250,000. Furthermore, as programming resources are limited, it should be recognized that the out-of-pocket costs of implementing the Keller-Wade Letter are in addition to the opportunity costs associated with the delay in rolling out other system enhancements.

No. of Copies rec'd
List ABCDE

0 + 3

Ms. Attwood
Page 2

It is our impression that the Commission intends to address the issues raised in the instant proceeding on an expedited basis. Therefore, even if the Commission ultimately decides (based upon compilation of a public record which justifies adoption of the rule changes inherent in the Keller-Wade Letter) to proceed with the measures listed in that letter, the time lost by suspending software development work would be no more than a few weeks. Given the possibility that the Commission may ultimately decide upon an alternative approach, and given the costs of going forward with work to implement the Keller-Wade Letter, we believe that the temporary (for now) suspension of development work would be in the public interest.

Thank you for your attention to this matter. If you have any further questions, please do not hesitate to contact any of the undersigned.

Sincerely,



James Grudus
AT&T
(908) 221-6630
295 N. Maple Ave.
Basking Ridge, NJ 07920



Norina Moy
Sprint
(202) 585-1915
401 9th St. NW, Suite 400
Washington, DC 20004



Henry Hultquist
WorldCom
(202) 736-6485
1133 19th St., NW
Washington, DC 20036

c: Diane Harmon, FCC
Marty Schwimmer, FCC
Jennifer Gorny, FCC
Michael Wade, DSMI