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Michael F. Altschul

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Federal Communications Commission
Office of the Secretary

Denise Walter
Commercial Wireless Division
Federal Communications Commission
Room 4-B421
445 12th Street, SW
Washington, DC 20554

IUT 01-108

Re: Privatizing the Administration of System Identification Numbers for Cellular Systems

Dear Ms. Walter:

This letter is in response to the December 19, 2002, letter from Roger S. Noel regarding Cellular System Identification (SID) administration. CIBERNET Corporation wishes to express its continued interest in being selected as the Cellular SID Administrator.

CIBERNET has administered the PCS System Identifiers since 1995 and advocates a single source administration of the cellular SIDs as well. Unlike frequency coordination and spectrum clearinghouse activities, SID administration is more akin to domain administration where the overriding goal is to avoid duplicative assignments of a unique identifier. Multiple cellular SID administrators introduce the potential of conflicting cellular SID assignments, a result which must be avoided. At a minimum, should the Commission continue to pursue multiple SID administrators, each administrator should be required to communicate SID assignments (and current SID listings) with the other administrators. It is our belief, however, because of the maturity of the cellular market, that there will not be sufficient demand for cellular SID assignments to justify this administrative burden – further underscoring CIBERNET's desire that the Commission select a single SID administrator.

Moreover, the Commission also must require the cellular SID administrator (or administrators) to publish the SID assignment list (and updates) on a royalty-free basis just as the FCC has made this information publicly available on its website. To ensure an easy transition, CIBERNET believes the Commission also must transfer its legacy cellular SID database to the private manager. This will ensure continuity of service to all cellular carriers. In addition, because the private manager of cellular SID assignments

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must be authorized to make SID assignments within the cellular SID range established by TIA's Technical Service Bulletin 29, the Commission must assign this authority to the private manager prior to relinquishing its responsibilities.[1] By undertaking these two administrative actions, the Commission will ensure an easy transition of cellular SID assignment to the private cellular SID administrator.

On behalf of CIBERNET, I look forward to reviewing the draft guidelines. Thank you for your consideration.

Sincerely,

Michael Altschul

[1] While CIBERNET is presently authorized to make PCS SID assignments using a different range of SID codes, TSB 29 expressly reserves to the FCC authority over the cellular SID range.