



April 16, 2003

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

Re: WT Docket No. 00-239: Guidelines for Cellular SID Administrators

Dear Ms. Dortch:

This letter is in response to the March 25, 2003 Public Notice, seeking comments to the proposed Guidelines for Cellular SID Administration. CIBERNET Corporation is pleased to provide the following comments to the proposed Guidelines.

While CIBERNET recognizes the Commission's intent to create an open process for cellular SID administration, CIBERNET continues to believe this is a mistake, given the importance of the cellular SID codes to the monthly roaming "net settlement" process administered by CIBERNET and the billing clearinghouses. However, if there are to be multiple administrators, it is critical that the Commission's Guidelines accommodate the need to preserve the integrity of the monthly net settlement process. If new SID assignment information is not available on a monthly basis, billing records for roaming service will be misrouted (or not routed at all), and customer bills will not be accurate or timely. Such a result is not in the public interest, and is contrary to the Commission's duty to the public.

In particular, to preserve the integrity of the monthly net settlement process, Section 5 of the Guidelines, RESPONSIBILITIES OF CELLULAR SID ADMINISTRATORS, must be modified. CIBERNET has administered the PCS System Identifiers since 1995. Based on our experience, the overriding goal of the Guidelines must be to avoid duplicative assignments of a unique identifier. This means that the assignment process among multiple administrators must be carefully controlled. To that end, in order to "assign SID numbers on a first come, first served basis from the available pool" as stated in Section 5.3, CIBERNET recommends that one central pool be maintained, on a basis that is accessible by all approved Administrators. CIBERNET proposes the implementation of a secure web site that is accessible to Cellular SID Administrators for the assignment process. Given the importance of this process to the net settlement process, CIBERNET is willing to take on the burden of publishing and maintaining the proposed web site.



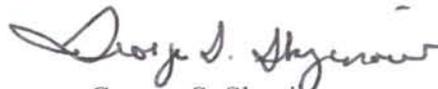
The assignment process will begin with an administrator providing sufficient information to fully identify the requesting license and licensee, including contact information and whether the SID is to be assigned to an "A" or "B" band carrier (in order to obtain the appropriate Odd or Even SID). Once the necessary fields are properly populated, the administrator will receive the assigned SID to provide to the licensee.

The web site then "provides the Public with access to a complete listing of assigned SIDs updated" as SIDs are assigned, as stated in section 5.8. Adequate notice for all SIDs assigned would be at a minimum monthly as all US cellular roaming is based on a billing cycle starting the 16th of each month. By providing a monthly update wireless carriers have the ability to update networks and billing systems accordingly. Because of this monthly billing and settlement cycle, and the critical role of SIDs to the settlement process, the annual update proposed in the draft Guidelines is not workable and would have an adverse affect on roaming and customer billing.

While CIBERNET Corporation believes that multiple cellular SID administrators creates a needless risk of conflicting assignments, with the above-described method of assignment, conflicts can be avoided and the effective communication of existing and newly assigned SIDs can be supported. In addition, it is of critical importance that new SID assignments be made publicly available on a monthly basis before the 16th day of each month.

On behalf of CIBERNET, I look forward to the next phase in the privatization of Cellular SID administration. Thank you for your consideration of these comments.

Sincerely,



George S. Shaginaw