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Federal Communications Commission
Office of Secretary

ORIGINAL

June 9, 2003

VIA COURIER

Marlene Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Attn: Denise Walter, Room 4-B421

Re: Memorandum of Understanding Regarding the Administration of Cellular
System Identification Numbers (SIDs)
WT Docket No. 01-108

Dear Ms. Dortch:

On behalf of PCIA, the Wireless Infrastructure Association ("PCIA"), enclosed is the original of the Memorandum of Understanding ("MOU") Between Federal Communications Commission ("FCC or the "Commission") and PCIA Regarding the Administration of Cellular System Identification Numbers ("SIDs") executed by PCIA. A copy of the MOU was filed today via the Electronic Comment Filing System ("ECFS") in WT Docket No. 01-108, and a copy was sent by e-mail to Qualex International. Also enclosed is a self-addressed stamped envelope.

Please refer any inquiries regarding this matter to the undersigned.

Very truly yours,



Eliot J. Greenwald

Enclosure

cc: Connie Durcsak

No. of Copies rec'd 0/1
List A B C D E

MEMORANDUM OF UNDERSTANDING
Between
Federal Communications Commission
and
PCIA, the Wireless Infrastructure Association

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JUN - 9 2003

Federal Communications Commission
Office of Secretary

**REGARDING THE ADMINISTRATION OF CELLULAR SYSTEM IDENTIFICATION
NUMBERS (SIDs)**

1. **PARTIES.** The parties to this Memorandum of Understanding (MOU or Agreement) are the Federal Communications Commission (FCC) and PCIA, the Wireless Infrastructure Association (PCIA).
2. **AUTHORITY.** The authority to enter into this agreement was delegated to the Wireless Telecommunications Bureau by the Commission.¹
3. **PUPROSE.** The purpose of the MOU is to provide a means for PCIA to administer the process of assigning System Identification Numbers (SIDs) to cellular licensees.
4. **RESPONSIBLITIES.** The responsibilities of a Cellular SID Administrator are outlined in a separate document entitled *Guidelines for Cellular SID Administrators* (Guidelines) which is included as *Attachment A* of this MOU.
5. **POINTS OF CONTACT.** For purposes of this Agreement, the point of contact for the FCC is the Wireless Telecommunications Bureau, Commercial Wireless Division, 202-418-0620. The point of contact for PCIA is Connie Durcsak, PCIA, 500 Montgomery Street, Suite 700, Alexandria, VA 22314, 703-739-0300.
6. **LIMITATION ON ASSIGNMENT OR TRANSFER.** This Agreement may not be sold, assigned or transferred to any party without the prior written approval of the FCC. In addition, PCIA agrees to report to the FCC, within **sixty (60) days** of its concurrence, any matters that could reasonably be expected to impair its ability to perform the duties authorized under this Agreement, including, but not limited to, a filing for bankruptcy or any legal or administrative proceeding that may bear upon PCIA's ability to perform the duties authorized under this Agreement.
7. **OTHER PROVISIONS.** Nothing in this Agreement is intended to conflict with current law or regulation or directives of the FCC. If a term of this Agreement is inconsistent with such authority, then that term shall be invalid, but remaining terms and conditions of this Agreement remain in full force and effect.
8. **EFFECTIVE DATE.** The terms of this Agreement will become effective on the date of the last signature subscribed below.
9. **MODIFICATION.** This Agreement and the Guidelines constitute the entire Agreement of the parties. The FCC may initiate changes to the Agreement and the Guidelines by providing at least 30 days written notice to SID Administrators. Any changes to the Agreement requested by the SID Administrator must

¹ See In the Matter of Year 2000 Biennial Regulatory Review – Amendment of Part 22 of the Commission's Rules to Modify or Eliminate Outdated Rules Affecting the Cellular Radiotelephone Service and other Commercial Mobile Radio Services, WT Docket No. 01-108, *Report and Order*, 17 FCC Rcd 18401 (2002).

be mutually agreed to in writing by both parties to the Agreement. The process to modify the Guidelines is described in Section 8.0 of the Guidelines.

10. **TERMINATION.** This Agreement is effective until terminated. Either party may terminate this Agreement by providing sixty (60) days notice to the other party. This Agreement may also be terminated by the FCC for cause at any time, if after notice of breach and a sixty (60) day period to cure the breach, the breach remains uncured. A breach is a failure of PCIA to perform any of the responsibilities under Section 4 of this Agreement outlined in the *Guidelines for Cellular SID Administrators*. Notifications required by this paragraph must be provided by Certified Mail – Return Receipt Requested and commence the day the Certified Mail is received by the other party. Within 30 days of termination of this Agreement for any reason, PCIA shall provide the FCC with a current and complete database of all cellular licensees and their SIDs.

11. **APPROVAL.** In accordance with the forgoing, the parties have indicated their approval of this Agreement as of the dates written below.

**FEDERAL COMMUNICATIONS
COMMISSION**

PCIA, the Wireless Infrastructure Association

By: _____

By: Connie Dursak ✓

Date: _____

Date: June 9, 2003

ATTACHMENT A

Guidelines for Cellular SID Administrators May 22, 2003

1.0 PURPOSE AND SCOPE

This document contains guidelines for the FCC-recognized Administrators for Cellular System Identifier Numbers (SIDs) within the United States.

- 1.1 Since the early 1980's, Cellular SIDs have been assigned by the FCC and have been a required element of the FCC authorization.
- 1.2 In August 2002, the Commission adopted an Order to eliminate SIDs from being a required element of the license and to transition the administration of SIDs to the private sector.

2.0 CELLULAR SID FUNCTION

- 2.1 System Identification Numbers, or SIDs, are numeric identifiers assigned to cellular systems. SIDs are transmitted by the cellular system so that the cellular mobile stations can determine whether the system through which they are communicating is a system to which they subscribe, or whether they are considered by the system to be roamers.

3.0 ASSUMPTIONS AND CONSTRAINTS

These guidelines are based on the following assumptions and constraints:

- 3.1 These guidelines should provide the greatest latitude to those providing cellular services while permitting the effective and efficient management of a finite resource.
- 3.2 The Cellular SID Administrators initially recognized by the FCC are responsible for developing an efficient process for administering Cellular SIDs in a multiple Administrator environment. The process will be reviewed by the FCC and then incorporated in these Guidelines under Section 7.0.
- 3.3 A Cellular Carrier can request a SID from any one of the FCC-recognized Cellular SID Administrators.
- 3.4 New Cellular SID Administrators can be recognized by the FCC by filing a letter of intent and certifying they will comply with the guidelines and then signing a Memorandum of Understanding with the Wireless Telecommunications Bureau.

4.0 ASSIGNMENT PRINCIPLES

The assignment principles defined below allow cellular systems the greatest possible latitude in providing seamless roaming capabilities.

- 4.1 Information requested from applicants for Cellular SID numbers will be kept uniform and kept to a minimum.
- 4.2 Maintain the current practice of assigning odd number SIDs to Channel Block "A" licensees and even number SIDs to Channel Block "B" licensees.
- 4.3 The assignment of a Cellular SID number does not imply ownership of the Cellular SID number.
- 4.4 If a license experiences a transfer of control or assignment of authorization, the authorized use of the Cellular SID remains with the license.
- 4.5 A request to use a SID assigned to another carrier must be accompanied by a notice stating that the authorized SID user concurs with the request

5.0 RESPONSIBILITIES OF CELLULAR SID ADMINISTRATORS

These general guidelines will be used by the Cellular SID Administrators in reviewing and processing requests for a SID. A Cellular SID Administrator will:

- 5.1 Assign a Cellular SID number to any FCC licensed cellular carrier who submits the appropriate request for a SID assignment.
- 5.2 Assign SID numbers in a fair, timely and impartial manner to any applicant that meets the criteria for assignment (see 5.1).
- 5.3 Assign SID numbers on a first come, first served basis from the available pool.
- 5.4 Request the minimum information necessary to make a SID assignment.
- 5.5 Assign the number of SIDs requested based on industry practices.
- 5.6 Treat sensitive information received from applicants as proprietary and confidential, and not to be shared with non-administrator personnel.
- 5.7 Ensure that fees charged for services are fair and reasonable.
- 5.8 Provide the Public with access to a complete listing of assigned SIDs updated annually.

6.0 RIGHTS AND RESPONSIBILITIES OF CELLULAR SID APPLICANTS AND ASSIGNEES

Entities requesting a Cellular SID assignment shall:

- 6.1 Keep administrative information current with an Administrator.
- 6.2 Have the right to request a SID from any one of the recognized Cellular SID Administrators

6.3 Comply with all applicable regulations.

7.0 CELLULAR SID ASSIGNMENT PROCEDURES

7.1 [Reserved for the SID assignment procedures, including the coordination of SID assignments in a multi-administrator environment. Procedures will be developed by the initial FCC-recognized Cellular SID Administrators.]

8.0 MAINTENANCE OF GUIDELINES

8.1 Cellular SID Administrators may request modifications to the Guidelines by sending their request to the FCC. Requests to modify the Guidelines should be based on a consensus agreement of all SID Administrators.

8.2 The FCC may initiate changes to the Guidelines by providing the Administrators with at least 30 days written notice.