

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
)  
Wireless Telecommunications Bureau ) WT Docket No. 02-146  
Opens Filing Window for Proposals to )  
Develop and Manage Independent ) DA 04-672  
Database of Site Registrations by )  
Licensees in the 71-76nGHz, 81-86 )  
GHz and 92-95 GHz Bands )

**PROPOSAL OF NECA SERVICES, INC.**

NECA Services, Inc. is pleased to provide this proposal in response to *Public Notice* DA 04-672,<sup>1</sup> which requests Database Manager proposals for the creation and maintenance of a single database of site/link registration information for licensees in the 71-76 GHz, 81-86 GHz, and 92-95 GHz bands.

**BACKGROUND ON NECA SERVICES, INC.**

NECA Services, Inc. (NECA Services) is a Delaware corporation that provides solutions for complex business needs. We are a recognized leader in fund, program, operational and data management. NECA Services has the expertise and experience necessary to design, implement and administer the proposed database. Some of the various functions managed by NECA Services include the role of Maintenance Agent for the administration of the ANSI T1.251-2001 Company Code Standard, administrator of cellular System Identification Numbers (SIDs), support roles for the Federal Schools and Libraries and Rural Health Care universal service programs as well as a number of universal service state funds. NECA Services also offers a variety of products and services that make it easier for telecommunications companies to do business. In addition, NECA Services is on two United States General Services Administration (GSA) schedules: Schedule 70, *General*

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<sup>1</sup> Wireless Telecommunications Bureau Opens Filing Window for Proposals to Develop and Manage Independent Database of Site Registrations by Licensees in the 71-76 GHz, 81-86 GHz and 92-95 GHz bands, *Public Notice*, DA 04-672 (rel. March 12, 2004).

*Purpose Commercial Information Technology Equipment, Software, and Services and Schedule 520, Financial and Business Solutions (FABS).*

The background and capabilities of our personnel encompass a broad range of demonstrated skill sets, including telecommunications industry experts, financial, regulatory and information systems professionals, and specialists with years of experience in handling the intricacies and challenges of daily operational processing, including database management. To continually provide comprehensive support of their work, NECA Services personnel stay abreast of current telecommunications and information technology, industry issues, FCC orders, laws and regulations. Finally, NECA Services is committed to achieving all objectives on time and within budget.

The FCC will benefit from NECA Services' design, implementation and management of a single site/link registration database for licensees in the 71-76 GHz, 81-86 GHz, and 92-95 GHz bands because:

- ✓ *We have professionally designed, implemented and managed day-to-day operational responsibilities, including the maintenance of various industry databases, with attention to detail and quality, and without cost overruns.*
- ✓ *We have demonstrated our competencies by successfully designing, implementing and administering numerous telecommunications support programs at both the state and federal levels, during periods of rapid growth and change.*
- ✓ *We took the lead in coordinating efforts between cellular System Identification Number (SID) administrators, including drafting mutually acceptable guidelines for process and procedures.*
- ✓ *Our seasoned Information Technologies professionals have designed, implemented and maintained several complex, secure databases including the NECA Tariff FCC No. 4 system.<sup>2</sup> This database contains 9.5 million records,*

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<sup>2</sup> The National Exchange Carrier Association, Inc. (NECA), which will furnish NECA Services with all the resources and personnel required to fulfill its role as a site/link DBA and as the coordinator of multiple site/link DBAs, is the FCC's designated administrator of the interstate access charge plan and, as such, files interstate tariffs and operates revenue pools on behalf of certain local exchange carriers. Under FCC rules, all incumbent local exchange carriers as of February 8, 1996 are members of NECA, a not-for-profit

*including 240,000 meet-point billing arrangements that are similar in structure to the point-to-point links described in Public Notice DA 04-672.*

- ✓ *We have demonstrated neutral, impartial and efficient management in each of the above programs and services.*

The skills and dedication of assigned staff are hallmarks of NECA Services. Our staff continually meet clients' objectives at reasonable costs while assuring the highest quality of service. It is with this same high standard of performance that NECA Services will build and manage the database of site registrations by licensees in the 71-76 GHz, 81-86 GHz and 92-95 GHz bands. NECA Services has been selected to serve as an administrator/manager of a wide-spectrum of complex governmental and telecommunications industry programs at all levels of government, and has demonstrated its experience and technical understanding of the most critical functions associated with successful third party database administration.

## **PROJECT SCOPE**

Functions typically performed by a third party database administrator (DBA) include:

- Program implementation including the design, creation and maintenance of web sites and databases
- Design and management of the systems, processes and procedures for daily operations, including those related to controlling potential fraud and issues of data integrity
- Project management and accountability
- Day-to day operational oversight
- Review and certification of the eligibility of each applicant/participant according to criteria set forth by the regulatory agency or industry guidelines
- Comprehensive periodic and ad hoc reporting
- Customer service and communications including telephone support, as well as the development and maintenance of up-to-date documentation and resource information

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association. *See also* 47 C.F.R. § 69.601 (b). NECA Tariff FCC No. 4 contains exchange carrier wire center and interconnection information for the ordering, provisioning and billing of access services. All NECA member companies and many non-member companies participate in Tariff No. 4.

- Regulatory relations and interface
- DBA relations and interface, if working in a multiple DBA environment
- Participation in industry forums and/or discussions to stay abreast of changing industry needs and respond to industry questions; this may include coordination of activities among multiple administrators
- Dispute resolution
- Quality control
- Billing and collection activities
- Internal and external auditing

From program and process design, through internal and external auditing, the scope of a third party DBA's functionality can be quite broad, and as a result, should be very clearly defined through a set of guidelines. In order to ensure that the DBAs meet the needs of the Commission and the industry, and remain neutral while doing so, sufficient time should be devoted to developing these guidelines prior to the launch of the program. Such guidelines are designed to maximize the efficiency with which the program is administered as well as the overall effectiveness of the program itself. Guidelines should address both the processes and procedures of the Database Managers as well as the processes and procedures of participants as they relate to system interfaces and data reporting. Commission involvement in collaboration with other interested stakeholders is an essential element in a successful third party DBA relationship. NECA Services took the lead role in drafting the guidelines currently in place for the six cellular SID administrators and welcomes the opportunity to serve in a similar capacity for the site/link registration guidelines.

## **PROJECT DEFINITION & REQUIREMENTS**

NECA Services proposes to build a database accessible via an Internet browser that accommodates multiple methods of data entry. Interfaces with participants for both communications and data transmissions are generally both automated (e.g., use of email or an interactive website to access, complete, and submit applicable forms and supporting documentation) and manual (e.g., US mail, fax, phone support, etc.). For example,

NECA's Tariff No. 4 database<sup>3</sup> is populated both manually and through automated uploads in order to accommodate participants' varied needs and technical capabilities. Likewise, NECA Services' Company Code Administration database allows for the submission of documentation by uploading files through a web-based interface, or by faxing documents to the administrator. Submissions for site/link registrations will be accepted through both mechanized and manual interfaces. All submissions will be automatically date and time stamped in order to ensure that they are handled on a non-discriminatory, first-come, first-served basis.

In order to ensure that registrations are properly coordinated with the Federal Government and that antennae are registered and in compliance with Part 17 of the Commission's rules,<sup>4</sup> web-based interfaces will be in place between NECA Services' database system and that of the National Telecommunications and Information Administration (NTIA) as well as the Commission's Antenna Structure Registration Database and Universal Licensing System. NECA Services staff will be thoroughly versed on the details of Part 17 of the Commission's rules in order to assist applicants having an unregistered antenna with the antenna registration process.

According to 47 C.F.R. § 101.147 (z)(3), "[e]ntities must meet the loading requirements of 47 C.F.R. § 101.141. If it is determined that a licensee has not met the loading requirements, then the database will be modified to limit coordination rights to the spectrum that is loaded and the licensee will lose protection rights on spectrum that has not been loaded." NECA Services suggests that as part of the guidelines created to ensure consistency of process across DBAs, an arbitration process for addressing disputes of lost protection rights be drafted. While the issue is being worked, the link in question will be flagged as being under review. Once the issue has been handled through the agreed upon arbitration process, the database will again be updated, as appropriate. In a similar manner, unconstructed and deleted links will also be removed from the database and stored as historical information only.

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<sup>3</sup> *Id.*

<sup>4</sup> See 47 C.F.R. Part 17.

Queries and reports will be available on all data elements listed in Appendix C of the Report and Order,<sup>5</sup> both for current and historical data. In addition to reports contained in a standard report library, ad hoc reports will be available at the request of the Commission and NTIA. Access to the database will be available at all times, as we currently contract two separate Internet Service Providers (ISPs), creating redundant access. Both providers run stand-by protocol to ensure that if one circuit fails, the other will be automatically deployed.

## **SECURITY**

To ensure that the site/link database is both accessible to the public, yet secure enough to protect the integrity of the data, several levels of security will be in place. Applicants wishing to register a site/link will be able to do so through a graphical user interface (GUI) available via a web browser with 128-Bit Secure Socket Layer (SSL) encryption. The Commission and NTIA will be able to query the database and run standard reports by accessing the database through a secure logon process. Four levels of security will protect data integrity:

- the firewall ring that secures NECA Services' infrastructure from an outside attack,
- the database servers that will host the data have their own security hierarchy built into the technology,
- the database level security implemented by NECA Services' that requires User ID / Password, working in conjunction with the database server security, and
- the data will be stored in an encrypted format that can be decrypted only by the designated application.

To further safeguard the data, nightly, monthly and annual data backups will be performed. Vital Records, Inc. is currently contracted for off-site storage services. Backups are

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<sup>5</sup> See Allocations and Service Rules for the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands, WT Docket No. 02-146, *Report and Order*, Appendix C.

performed nightly using IBM's Tivoli Storage Manager which backs up all data and applications onto IBM LTO-type tapes. Vitals Records, Inc., located in Roxbury, New Jersey, picks up the tapes daily and stores them at their state-of-the-art, underground facility. Daily tapes are retained for 21 days, monthly tapes are retained for 365 days, and the annual tapes are retained for one year. The retention period for specific data content is determined by the individual business units and meets all risk management and regulatory requirements.

Business continuity will be ensured through the existence of a detailed business continuity plan. A major component of the overall plan already in place is the alternative site that exists in NECA's Alpharetta, Georgia office. This site is equipped with the necessary hardware and networking components to affect recovery of the production-processing environment. As such, appropriate servers are installed that will support all systems and applications, including access means for various clients and NECA staff. Non-database files systems are replicated over the network to speed recovery. The remaining data would be restored from backup tapes described earlier. Procedures are regularly maintained to ready this site for a recovery should it become necessary.

### **PROJECT TIME FRAME**

Our experience indicates that a third party DBA can generally be implemented within approximately 150 days from the time that a contract has been executed. This timeframe, which includes testing, demonstration and operational launch, can be affected if new or particularly complex information management tasks are involved or if new operational systems and procedures need to be designed, tested and implemented prior to start-up. Using existing data systems, interfaces and procedures as a starting point can certainly speed up this process.

### **COORDINATION AMONG MULTIPLE DBAs**

The industry currently contains many programs and/or processes for which only one administrator is responsible. There are also a few processes for which multiple administrators share responsibilities. Under the multiple administrator scenario,

administrators generally either divide responsibilities based on well-defined criteria (e.g. by operating state, type of license, etc.) or they compete for business in an open marketplace. In programs where transaction volume is large, as is likely the case with site/link registrations, a multiple administrator scenario may be implemented.

In order to coordinate the activities of multiple administrators without sacrificing process efficiency and/or data integrity, NECA Services agrees with the Commission that a centralized database, owned and supported by a single administrator is most efficient. This is the approach taken for the process of maintaining NECA Tariff FCC No. 4 data.<sup>6</sup> That is, while a company can update their own data or engage the services of another entity to update data on their behalf, only NECA maintains the database's hardware, software and security. A single administrator could more effectively oversee and assist the industry with adherence to established guidelines than if compliance to industry standards were decentralized.

NECA Services is both qualified and willing to not only design and build the single site/link database, but also to oversee the coordination of services and processes between DBAs. Our expertise in the role of coordinator is demonstrated in our role in the privatization of cellular SID administration. In that project, NECA Services took the lead in working with the other administrators to draft agreed upon guidelines for process, procedure and policy. Certain aspects of those guidelines apply equally as well in the registration of site/link information. NECA Services suggests that the following principles be considered:

- The most efficient process for administering site/link registrations in a multiple administrator environment is through the use of a centralized database and a standard registration form,
- A licensed applicant can request a site/link registration from any one of the FCC-recognized DBAs,
- Information requested from applicants for site/link registrations will be uniform and kept to a minimum,

- Sensitive information received from applicants will be treated as proprietary and confidential, and will not be shared with non-administrator personnel,
- Fees charged for services will be fair and reasonable,
- New DBAs recognized by the Commission will file a letter of intent certifying that they will comply with the established guidelines, and will sign a Memorandum of Understanding with the Wireless Telecommunications Bureau (the Bureau),
- Contact information for all DBAs will be posted on the Bureau's website along with a copy of the guidelines,
- In the event that a DBA terminates its obligations as a site/link database manager, that DBA will provide to any one of the remaining DBAs all information regarding any outstanding submissions, or modifications and copies of any current or archived supporting documentation gathered from carriers for the purposes of site/link registration,
- Archived data will be maintained for a period of not less than one year, and as meets the requirements of the Commission.

### **ADDITIONAL SERVICES**

In addition to designing and implementing the site/link database, and coordinating the efforts between multiple DBAs if the Bureau selects more than one, NECA Services will also assist applicants with antenna registration if needed, and provide data analysis of the entire site/link database or any portion thereof, as requested by the Commission, NTIA, and the industry at large. Additional studies and reports may also be generated from the database for presentations and publication by the business and technical community. We will continue to monitor evolving rules and regulations of the Commission concerning these licenses, and will communicate with licensees on pending changes, revised reporting requirements, etc. Given our position and contacts in the industry, it may also be possible to pursue other services that carriers would find beneficial. If available, these additional

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<sup>6</sup> *See supra* n. 2.

services may include the use of propagation tools at the time of registration, permitting real-time analysis of potential and problematic interference.

### **CONFLICT OF INTEREST**

There are no past or present relationships between NECA Services, or any one of its officers, directors, principals, agents, proposed subcontractors, or employees that present a conflict of interest. In addition, NECA Services will take all actions within its power to ensure that no future, actual or perceived conflicts of interest occur. NECA Services does certify and agree that NECA Services, Inc. and its affiliates will not be licensees in the 71-76 GHz, 81-86 GHz or 92-95 GHz bands.

### **SUMMARY**

NECA Services applauds the Commission's privatization of the site/link database administration as well as their direction in coordinating efforts between the WTB, NTIA and industry players. This project complements the Commission's strategic goals for broadband deployment, including their efforts in the Federal Rural Outreach Initiative designed to encourage greater access and deployment of wireless services throughout rural America. Regardless of the Commission's decision on the number of DBAs engaged in the maintenance of site/link registrations, or their decision on the developer of the single, centralized database and the coordinator of efforts between DBAs, NECA Services remains eager and willing to work with the Commission and with the industry as a whole to ensure that site/link registration is run smoothly and effectively.

Respectfully submitted,  
NECA Services, Inc.

/s/ Ann C. Wahba  
Ann C. Wahba  
NECA Services, Inc.  
80 South Jefferson Road – S3055  
Whippany, New Jersey 07981  
(973) 884-8143  
awahba@necaservices.com