

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Petitions for Limited Waiver of |) | CC Docket No. 99-200 |
| Section 52.15(g)(2)(i) of the |) | |
| Commission's Rules Regarding |) | DA 05-663 |
| Numbering Resources |) | |

REPLY COMMENTS OF NENA

The National Emergency Number Association (“NENA”) submits these reply comments in the captioned proceeding. While most comments did not address 9-1-1 specifically, several addressed the Petitioners’ obligations to meet number portability requirements established under direction of the FCC.¹ The rule for wire carriers requires support of emergency services where already available with no degradation in service quality.

Complementing this requirement, NENA created a new data standard (02-006, Standards for Service Provider Local Number Portability). The key change for 9-1-1 data (Address Location Information) was that ALI (Automatic Location Identification), a person’s address and callback number, would not disappear when a customer changed service providers, as it had prior to portability. This standard has been modified since originally created

¹ See, e.g. Sections 52.23 and 52.31 of the Rules.

in 1997, to account for further changes in portability and pooling, and has merged into one of NENA's two main data standards.²

To assist in preserving the accuracy and integrity of 9-1-1 ALI databases throughout the country, additional changes were made prior to the advent of Wireless Local Number Portability ("WLNP"). Special codes were established in porting request forms between wireless and wireline providers to enable the deletion of ALI records for a wireline to wireless port. The FCC accepted a wireless surrogate for the parity obligation in Section 52.31: "To the extent that wireless carriers are deploying automatic location identification technology in their networks according to compliance plans approved by the Commission, we conclude that they will satisfy the performance criteria in section 52.23 with respect to provision of emergency services."³

Congruent with the action taken for wireless carriers, NENA asks that the FCC consider making the preservation of callback number and ALI data a requirement for number porting between wire or wireless carriers and VOIP providers. This action may well be more appropriate for the general IP services docket, WC 04-36, than for this numbering assignment waiver

² NENA Data Standards for Local Exchange Carriers, ALI Service Providers and 9-1-1 Jurisdictions, 02-011 (last revised 11/2004), accessible at http://www.nena.org/9-1-1TechStandards/nena_standards.htm.

³ FCC Memorandum Opinion and Order, (FCC 02-215), page 11, footnote 85.

proceeding.⁴ However, any waiver grants to the Petitioners could be conditioned on their acceptance of any number porting obligations established in Docket WC 04-36.

Respectfully submitted,
NENA

By _____

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⁴ We are filing these comments in 04-36 as well as 99-200.