



Brian Benison  
Director  
Federal Regulatory

AT&T Services Inc. T: 202.457.3065  
1120 20<sup>th</sup> Street, NW F: 202.457.3070  
Suite 1000  
Washington, DC 20032

November 9, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

**RE: Intercarrier Compensation  
WC Docket No. 01-92**

Dear Ms. Dortch:

As discussed with FCC staff on September 20, 2007<sup>1</sup>, a few Resp Orgs are continuing to use the CIC 0110 code to improperly terminate toll free traffic to AT&T's local exchange carrier network. Accordingly, AT&T will implement the Carrier screens of Release 16.3, IntraLATA Carrier Management feature in the SMS/800 Database on December 27, 2007<sup>2</sup>. While AT&T is under no obligation to provide notice or delay implementation, it is sending the attached letter via certified mail or UPS<sup>3</sup> to all 351 Resp Orgs advising them of this change and encouraging them to review their records and make necessary adjustments before December 27th. The notification also provides a point of contact for Resp Orgs to call if they have any questions or need further information.

Please call me if you have any questions.

Sincerely,

/s/ Brian Benison

cc: Pam Arluk  
Deena Shetler  
Gene Gold  
Dick Kwiatkowski

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<sup>1</sup> See September 21, 2007 from Brian Benison in WC Docket 01-92.

<sup>2</sup> While the SMS Update 16.3 was designed to address this problem at both the network and terminating LEC levels, AT&T is only implementing the carrier screens preventing Resp Orgs from using CIC 0110 to route calls without an arrangement with the terminating LEC for access billing.

<sup>3</sup> The mailing will be sent on November 12, 2007 that this change will be effective December 27, 2007. Letters to international Resp Orgs will be sent UPS.



AT&T  
350 N Orleans St.  
Floor 3  
Chicago, IL 60654

November 12, 2007

Effective December 27, 2007, AT&T Midwest, West, Southwest, and Southeast will exercise their option to implement the Carrier screens in the SMS/800 Database Release 16.3 IntraLATA Carrier Management feature, which the SMS/800 Management Team (SMT) implemented in that database on February 5, 2006. This feature allows Carriers and Network Service Providers to control and prevent the unauthorized routing of IntraLATA toll-free calls within and/or across their networks.

AT&T's activation of this feature will adhere to the Release 16.3 compliance requirements of the IntraLATA Carrier Management validations. As a result, any new or updated records that utilize CIC 0110 over AT&T's local network without having the appropriate approvals/authorizations in place will fail validation. Furthermore, in a subsequent phase, any toll-free records that were created prior to December 27, 2007 will undergo the screening for AT&T routing authorization. During the second phase, all records that are identified as improperly routing to AT&T will also fail validation.

In order to avoid any disruption of your customers' toll-free service, you should utilize the next forty-five (45) days to review your records and ensure that you have the appropriate authorizations in place for the routing information contained in the toll-free record that you have created.

Questions may be directed to Carolyn Staley on 312-335-6618.