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June 8, 2009

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Petition of TeleCommunication Systems, Inc. and  
HBF Group, Inc for Waiver of Part 52 of the Commission's  
Rules, CC Docket NO. 99-200

Dear Ms. Dortch:

On June 5, 2009, Dick Dickinson, Kim Scovill, Dick Dickinson, and Russell Frisby, representing TeleCommunication Systems, Inc. (TCS) held a telephone conference with Tim Stelzig, Assistant Chief and Ann Stevens, Deputy Chief of the Competition Policy Division of the Wireline Competition Bureau to update the Bureau as to recent difficulties with the current pseudo ANI (p-ANI) numbering regime. Mr. Dickinson detailed two incidents where the lack of a central numbering coordinator, and other glitches in number management, caused mis-assignment of p-ANI resources, and Mr. Scovill and Mr. Frisby review current relevant regulatory events.

The first situation occurred on May 11, 2009 in Colorado when a combination of operator error at another company that manages p-ANI (not TCS) and a lack of software safeguards in some selective routers caused approximately 100 ESQK numbers to be mis-assigned to another routing entity instead of TCS, where the numbers should have been assigned. Approximately 12 calls were routed to the default PSAP causing public safety authorities to contact TCS about the condition. Fortunately, the fundamental assignment errors were discovered and the appropriate ESQK resources were properly cataloged between the parties. Also, a permanent software change in the appropriate selective routers should prevent any reoccurrence of this issue. A NORS report was not triggered by this event.

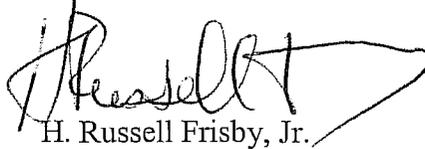
The second situation occurred as a result of the system-wide ESQK audit TCS instituted as a result of the Colorado matter. It was discovered that as a result of confusion over numbering management in Minnesota between 911 carriers, the State of Minnesota, and TCS, certain blocks of ESQK numbers were mis-assigned between carriers. This time, however, the assignments did not impact any actual traffic and the audit revealed the errors in time to fully correct the situation. The parties involved have

implement checks and safeguards and there has been an assignment software fix put in place to prevent a reoccurrence of this type of issue in the future.

TCS' representatives also detailed for the Bureau some recent events in TCS' attempts to obtain CLEC certifications in various states, as is currently required under Commission policies for the acquisition and management of p-ANI on a nationwide basis. The State of Illinois has passed a new law, the "911 Provider Act," that has dramatically changed the certification process for companies seeking CLEC certification so that they can provide competitive 911 services in Illinois. It is very possible that this new regulatory scheme may be in direct contradiction to the Commission's directive to secure CLEC certification as a prerequisite for p-ANI management, and other states may follow this same course. TCS also detailed how several other states have questioned TCS' and other 911 providers' CLEC applications and caused certification difficulties, again with potential negative consequences for TCS' compliance with the Commission's p-ANI requirements.

TCS' representatives further indicated that all of the above incidents and the changes at the state level for CLEC certifications are continuing examples which demonstrate the need to grant TCS' pending p-ANI Waiver Petition at the Commission in the above-referenced proceeding. They noted that if TCS' Petition were granted, the company would not need to secure CLEC certifications in all jurisdictions in order to obtain and manage p-ANI resources, thus permitting it to deal with the interim numbering administrator directly and avoiding many of the technical aspects that led to the situations noted above. In concluding, they pointed out that TCS has more than adequately demonstrated that it is in all other ways pertinent to the Commission's policies and regulations fully qualified to obtain and manage p-ANI resources, and that there was a danger that the continuing lack of direct national p-ANI authority will precipitate additional issues with numbering management and 911 call completion. Consequently they urged the Commission to grant TCS' waiver request as soon as possible.

Sincerely,



H. Russell Frisby, Jr.

cc: Tim Stelzig  
Ann Stevens