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March 11, 2011

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: WT Docket No. 06-150, PS Docket No. 06-229, WP Docket 07-100

Ms. Dortch:

On March 10, 2011, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) and its IMSI Oversight Council (IOC) had a telephone conversation with representatives from the Public Safety and Homeland Security Bureau (PSHSB). The purpose of this call was to provide more information about the issuance of system identifier codes (PLMN IDs), and to correct a statement made by the Commission in its *Third Notice of Proposed Rulemaking (Third NPRM)*, released January 26, 2011, in the above-referenced dockets.

The ATIS IOC is an open industry committee of telecommunications companies and other organizations with a direct interest in the management of International Mobile Subscriber Identify (IMSI) codes, which are used to identify mobile terminals for the purpose of international roaming. The IOC, which is open to all directly- and materially-interested participants including governmental agencies such as the Commission, develops consensus requirements and procedures for the assignment and maintenance of IMSIs, and specifically a portion of the IMSI known as the Home Network Identity (HNI).

The IOC is responsible for overseeing the management of IMSI codes that have been assigned to the United States and its possessions as authorized by the U.S. Department of State since 1996. The issuance of IMSI HNIs is done pursuant to industry developed Guidelines known as the *International Mobile Subscriber Identity (IMSI) Assignment and Management Guidelines and Procedures*. These Guidelines are based on the International Telecommunications Union recommendation that underlies the global assignment of IMSIs, and are maintained and updated by the IOC with the consensus of IOC participants. As such, the Guidelines are a living document that changes to meet evolving industry and user needs.

In the *Third NPRM*, the Commission stated that the ATIS IOC Guidelines require membership in the GSM Association (*Third NPRM*, para 34). As noted during the call, this statement is inaccurate and does not reflect either the current or past versions of the IOC Guidelines.

When the Commission was drafting the *Third NPRM*, Version 11 of the Guidelines was in effect. As with previous versions, this version of the Guidelines required that an HNI applicant must be a “public mobile operator.” This version also included an alternative to this requirement for entities that did not operate a public mobile network, but that needed IMSI HNIs (such as Mobile Virtual Network Operators). Thus, the Guidelines allowed those that were not public mobile operators to obtain codes if they were “...at least an associate member with the GSM Association or other recognized/approved industry governing body.” However, membership in the GSM Association or other recognized association was never required and was offered only as an alternative eligibility option to provide a greater access to HNI codes.

The current version of the Guidelines, version 12, eliminates any possibility of confusion pertaining to this issue. At the request of the public safety community, the ATIS IOC worked diligently and cooperatively with the staff of National Institute of Science and Technology and the Commission, and the Guidelines were amended in December 2010 to accommodate IMSI HNI use as PLMN IDs by public safety. In addition, the IOC made available the test IMSI mobile network codes for use by the public safety participants at the beginning of the process while the Guideline revisions were in process.

As a result of this effort, the application criteria were revised significantly. Among the revisions was the removal of the reference to the GSM Association or other recognized/approved industry governing body. Thus, the eligibility requirements in the Guidelines now read:

6.1 The HNI applicant must be, and certify that it is, a public network operator (commercial or government), or an authorized agent operating on behalf of a public network operator, offering mobility services in the United States with a need to roam onto/from commercial networks, or that it is a provider of a service profile management system (e.g. Home Location Register [HLR], Home Authentication, Authorization, and Accounting [AAA], or Home Subscriber System [HSS]) based in the United States for end user devices that can access public networks in the United States.

The following representatives from the PSHSB were present on this call: Genaro Fullano (Associate Bureau Chief); Jerome Stanshine (Engineer); Behzad Gaffari (Systems Engineering Chief with ERIC); Brian Hurley (Attorney); and Yoon Chang (Engineer). Attending on behalf of the ATIS and its IMSI Oversight Council were: Adam Newman (Telcordia Technologies), Chair of the ATIS IOC; Jean-Paul Emard, Director of Industry Forums, ATIS; and Thomas Goode, General Counsel, ATIS.

Pursuant to Section 1.1206 of the Commission’s rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceedings.

If you have any questions about this matter, please contact the undersigned. Further information about the IOC can be found at www.atis.org/ioc/index.asp.

Sincerely,



Thomas Goode
General Counsel

cc: Genaro Fullano (Associate Bureau Chief)
Jerome Stanshine (Engineer)
Behzad Gaffari (Systems Engineering Chief with ERIC)
Brian Hurley (Attorney)
Yoon Chang (Engineer)