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March 31, 2014

Via Email

Henning Schulzrinne
Chief Technology Officer
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte*, WC Docket No. 13-97

Dear Dr. Schulzrinne:

On behalf of its Industry Numbering Committee (INC), the Alliance for Telecommunications Solutions (ATIS) would like to express its appreciation for the Commission's efforts in hosting the numbering testbed workshop on March 25, 2014.

ATIS INC agrees with the Commission that the transition of the PSTN raises both challenges and opportunities for the assignment of telephone numbers and for the features, capabilities, and security of numbering-related databases. ATIS further agrees that correctly addressing transition-related numbering issues will be essential to preserving core values of competition and consumer protection.

ATIS INC has been working on high-level functional requirements for the numbering testbed. The requirements, outlined below, are being shared to ensure the industry's alignment with Commission expectations. ATIS INC notes that, although functional elements may be tested individually, the testbed environment as a whole must have the ability to:

1. Maintain an assignment pool of applicable numbering resources;
2. Facilitate the assignment of a numbering resource (*e.g.*, e.164 number) in a secure and efficient manner from an administrator(s) within a specified amount of time;
3. Transfer a numbering resource between administrators within a specified amount of time in a secure and efficient manner (assuming multiple administrators);
4. Identify the service(s) and/or destination(s) associated with a resource in a secure and efficient manner;
5. Transfer (*e.g.*, port) a numbering resource and/or service and/or destination(s) between service providers within a specified amount of time;

6. Modify a numbering resource, service(s) associated with a resource, and/or destination(s) in a secure and efficient manner;
7. Return a numbering resource and/or disconnect a service and/or destination(s) in a secure and efficient manner;
8. Notify appropriate entities of any of the above activities in a secure and efficient manner;
9. Track and manage the numbering resource in a secure and efficient manner to assist with the management of conflict resolution as well as service history;
10. Communicate with emergency services (*e.g.*, 911, region emergency SMS messages) and other common services (*e.g.*, 211, n11) for the numbering resources and/or services (*e.g.*, text, voice) and/or destinations (*e.g.*, devices, endpoints); and
11. Appropriately address security issues.

ATIS INC has not attempted to identify the stakeholders that will perform the functions outlined above.

Thank you for providing us the opportunity to address these important industry issues. A copy of this letter is being submitted on the record of the above-referenced docket. If you have any questions or concerns regarding the material provided, please feel free to contact me.

Sincerely,



Thomas Goode
ATIS General Counsel

cc: Robert Cannon, Senior Counsel, Office of Strategic Planning and Policy Analysis