

Standards Committee T1

August 28, 2002

Carrier Liaison Committee

Telecommunications  
Industry Forum

Ordering and Billing  
Forum

Network Interconnection  
Interoperability Forum

Industry Numbering  
Committee

Protection Engineers  
Group

Standards Committee O5

Network Reliability  
Steering Committee

Internetwork  
Interoperability Test  
Coordination Committee

Telecommunications  
Fraud Prevention  
Committee

Generic Requirements  
Users Group

International Forum on  
ANSI-41 Standards  
Technology

Interactive Voice  
Response Forum

TTY Forum

Administrative Council for  
Terminal Attachments

IMSI Oversight Council

Mr. Eric Einhorn  
Acting Chief  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Awareness of the International Forum for ANSI-41 Standards  
Technology and International Roaming Mobile Identification  
Numbers

Dear Mr. Einhorn:

The purpose of this letter is to inform the Federal Communications Commission (“FCC” or “Commission”) of the work of the International Forum for ANSI-41 Standards Technology (“IFAST” or “Forum”) with regard to the administration and assignment of International Roaming Mobile Identification Numbers (“IRMs”). The IFAST develops guidelines and assigns IRMs to carriers offering international roaming services. IRMs, in turn, allow for international roaming and ensure unique identification of each active mobile phone subscription

IRMs are assigned in blocks of one million to carriers in order to identify a range for each carrier providing international roaming capability. They follow the format 0-XXX+6D or 1-XXX+6D. The first four-digit prefix is assigned by the IFAST as an “IRM Network Identifier.” The last six digits are assigned by the carrier.<sup>1</sup> This creates two thousand distinct network identifiers, each able to uniquely identify one million subscribers. IRMs are a short-term solution, allowing for international roaming between AMPS, CDMA and TDMA networks. The use of IRMs may be discontinued when other specific technologies or capabilities are implemented in wireless networks. IRMs are not part of the North American Numbering Plan (“NANP”).

<sup>1</sup> Each carrier is free to distribute IRMs according to its own international numbering plan.

The IFAST attempts to facilitate international roaming by minimizing conflicts between IRMs and the NANP, as well as other regional numbering plans. All IRMs begin with either a "0" or a "1". The IFAST is concerned with other uses of numbering resources starting with a "0" or "1". Therefore, the IFAST requests that the NANP continue the practice of not using numbering sequences beginning with a "0" or a "1" in order to prevent conflicts with IRMs. This is consistent with the recommendations of the ATIS Industry Numbering Committee (INC) regarding number expansion.

By way of background, the IFAST began in 1996 as the Joint Committee on Cellular Roaming ("JCCR"), convened by organizations from Mexico, the United States and Canada, to resolve problems associated with the lack of coordination between national MIN numbering plans. The U.S. Department of State was involved in its inception. Once the JCCR completed its work, the Department of State asked those involved to continue to work issues related to international roaming, and the IFAST was formed.

The IFAST currently provides a venue for entities around the world to address international roaming issues. More than 109 organizations participate in IFAST, including wireless service suppliers, network operators, equipment suppliers, government organizations, consultants, and industry associations. IFAST has members on every continent (except Antarctica), and participants from 37 countries, including Argentina, Brazil, Canada, Colombia, Chile, France, Israel, Japan, Kazakhstan, Korea, Malaysia, México, Paraguay, Peru, Philippines, Russia, Taiwan, United Kingdom, United States, and Venezuela.

Representatives of the IFAST would welcome the opportunity to meet with the appropriate Commission staff to discuss the issue of numbering resources beginning with a "0" or a "1" in further detail. The next IFAST meeting is September 25-26, 2002 in Washington, DC at the ATIS offices.

Should you have any questions regarding this matter, please contact the IFAST Chairperson, Fred Gaechter of Telcordia Technologies, at 973-423-3443 or me at 202-434-8847. I will contact your office shortly to explore the possibility of staff attendance at the September meeting or, a separate meeting between IFAST representatives and the appropriate Commission staff.

Sincerely,

*Megan L. Campbell*  
General Counsel

cc: Cheryl Callahan, Assistant Chief, TAPD, WCB (ccallaha@fcc.gov)  
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Megan Hayes, IFAST Secretariat (mhayes@atis.org)  
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