August 30, 1999

Lawrence E. Strickling Chief, Common Carrier Bureau Federal Communications Commission The Portals 445 Twelfth Street, SW Washington, D.C. 20554

Dear Mr. Strickling:

In a Public Notice released on August 17, 1999, the Common Carrier Bureau sought comment on the Amended Request by Lockheed Martin IMS for expeditious review of the transfer of its Communications Industry Services (CIS) business. In that Notice the Bureau invited the North American Numbering Council (NANC) to provide "a recommendation on whether the proposed business arrangement will fully satisfy the needs of the telecommunications industry for a neutral third party numbering administrator".

In a letter to you dated March 31, 1999 I indicated that the NANC had considered in significant detail the original petition for transfer of the CIS business and concluded that the new organization would not be subject to undue influence by parties with a vested interest in the outcome of numbering administration activities

The NANC has reviewed the Amended Request and considered it during its meeting of August 24, 1999. NANC concluded that this new proposal is substantially better than the previous proposal that it found to be adequate, and that the business arrangement set forth in the Amended Request fully satisfies the needs of the telecommunications industry for a neutral third party numbering administrator.

Sincerely,

Alan C. Hasselwander Chairman, North American Numbering Council

cc: Yog R. Varma, Diane Harmon, Jared Carlson, Jeannie Grimes, Ron Binz, John Hoffman, Jeff Ganek