

I'm writing in reference to the Free Flow of Information on the Internet NOI.

Background:

The United States government is in charge of allocating new ranges of telephone numbers to be assigned to telecommunications carriers to satisfy new customer requests.

They contract this responsibility, conferred upon them by the ITU, to the North American Numbering Plan Administrator. This is a company selected by the FCC in a competitive bid to provide the administration of the North American Numbering Plan. The company is currently Neustar.

Neustar does not make policy, but instead follows policy issued by the FCC, state commissions, and the ATIS industry group, under approval from the FCC.

Problem:

<http://www.atis.org/inc/Docs/iss/Iss545.doc>

ATIS Issue 545, Titled "Removal of Switch CLLI Information from NANPA Website" makes a statement that the availability of a 13 character unique identifier for a telephone switch, known as a "CLLI Code", is an issue of Homeland Security and assists the targeting of terrorism.

No act of terrorism has ever taken place in the United States against an unmanned network element for the purpose of partially disrupting some communications in the United States. To the extent facilities have been vandalized, they have been obvious to attackers (ie: fiber markers sticking out of the ground, marked manholes, aerial cables).

The 13 character identifier is used within the telecommunications industry to assist technicians in call routing. The real reason this data was removed is to eliminate free access to this information, literally forcing telecommunications providers to purchase this data from a company called Telcordia (previously known as Bellcore, a company spun off from the 1984 Divestiture of the Bell System). This data is estimated to cost in the mid 5-6 digits per year. No public record of the actual costs is known, you're required to sign an NDA to get pricing, which according to Telcordia is "value based" which is a euphemism for charging you based on how much money you can afford to spend on it. Remember, prior to 2007, this data was freely available and was NEVER used in a terrorist attack.

Why is this not a national security issue? Let me explain quickly.

Even a high tech adversary well versed in telecommunications, with decades of experience, would not want to use telephone prefix information and CLLI code information to plan a terrorist attack. It's hard that way, and has no intrinsic value.

A high or low tech territory would perform a common sense solution - they would go to the target, and follow the aerial and buried cables from the target back to the telephone company central office. These, interestingly enough, are generally

well constructed brick buildings that are deliberately difficult to get into or damage. In stark contrast to say, the manhole just outside the building where all the fiber optic cable enters the building, which is usually completely unprotected and has no alarming. This entrance is vulnerable to a number of trivial attacks, all highly disruptive, and none of which require a 13 character alphanumeric identifier.

The only real purpose of removing these is to stop a free flow of information to consumers, telecommunications advocates, and startup telecommunications providers who cannot afford Telcordia's "Value Based Pricing".

In the interests of full disclosure, I run a business competing with Telcordia. Unlike them, I publish my data to the general public with explanations as to what it all means, and respond to support questions, generally free of charge, from the general public. I do charge a nominal fee of around \$5-\$15 a month for unlimited downloads of my data to anyone with a valid credit or debit card.

Thank you for your consideration!

Paul Timmins

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