

6607 Willow Lane
Mission Hills, Kansas 66208

June 21, 2000

Mr. Lawrence C. Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Larry:

The Commission's *NRO Order*, FCC 00-104, released March 31, 2000, was published in the Federal Register on June 16, 2000. If the Office of Management and Budget (OMB) grants the FCC's emergency request, the rule governing the format of the data for the August 1, 2000 forecast and utilization reporting deadline will not be published in the Federal Register until June 23, 2000.

Pursuant to paragraph 53 of the *NRO Order*, the Commission requires all carriers filing data to file electronically in three different potential formats. Furthermore, the Order specifically instructs the NANPA to develop and establish these data entry mechanisms within 45 days of the publication of this Order in the Federal Register.

At the June 20, 2000 NANC meeting NANPA committed to providing the format for the Electronic File Transfer (EFT) within 30 days of the FCC publishing its Rule on the data format, which will be no earlier than July 23, 2000. Moreover, NANPA stated that the system which would allow NANPA to organize and analyze the submitted data would not be available until some undesignated time after August 1, 2000.

The NANC believes that the FCC should carefully consider the potential negative impacts of this information on the timeliness and usefulness of the COCUS data.

Sincerely,

John R. Hoffman
NANC Chair

Cc: Cheryl Callahan, Designated Federal Officer (DFO)
Jeannie Grimes, Alternate DFO
NANC Members