GUIDELINES FOR CELLULAR SID ADMINISTRATORS September 5, 2003

1.0 PURPOSE AND SCOPE

This document contains guidelines for the FCC-recognized administrators for Cellular System Identifier Numbers (SIDs) within the United States.

- 1.1 Since the early 1980's, Cellular SIDs have been assigned by the FCC and have been a required element of the FCC authorization.
- 1.2 In August 2002, the Commission adopted an Order to eliminate SIDs from being a required element of the license and to transition the administration of SIDs to the private sector.

2.0 CELLULAR SID FUNCTION

2.1 System Identification Numbers, or SIDs, are numeric identifiers assigned to cellular systems. SIDs are transmitted by the cellular system so that the cellular mobile stations can determine whether the system through which they are communicating is a system to which they subscribe, or whether they are considered by the system to be roamers.

3.0 ASSUMPTIONS AND CONSTRAINTS

These guidelines are based on the following assumptions and constraints:

- 3.1 These guidelines should provide the greatest latitude to licensees providing cellular services while permitting the effective and efficient management of a finite resource.
- 3.2 The Cellular SID Administrators initially recognized by the FCC developed an efficient process for administering Cellular SIDs in a multiple administrator environment through the use of a centralized database and a standard SID request form.
- 3.3 A cellular licensee can request a SID from any one of the FCC-recognized Cellular SID Administrators.
- 3.4 New Cellular SID Administrators may be recognized by the FCC by filing a letter of intent certifying they will comply with the Guidelines and by signing a Memorandum of Understanding with the Wireless Telecommunications Bureau.
- 3.5 Contact information for all SID Administrators will be posted on the Bureau's website along with a copy of these Guidelines.

4.0 ASSIGNMENT PRINCIPLES

The assignment principles defined below allow cellular systems the greatest possible latitude in providing seamless roaming capabilities.

- 4.1 Information requested from applicants for Cellular SIDs will be kept uniform and kept to a minimum.
- 4.2 SIDs will be assigned beginning with the ITU designated range of 1 to 2175 and will not be limited by this range and will be issued, to the greatest extent possible, in accordance with industry-accepted practice.
- 4.3 Maintain the current practice of assigning odd number SIDs to Channel Block "A" licensees and even number SIDs to Channel Block "B" licensees.
- 4.4 The assignment of a Cellular SID does not imply ownership of the Cellular SID.
- 4.5 If a license experiences a transfer of control or assignment of authorization, the authorized use of the Cellular SID remains with the license.
- 4.6 A request to use a SID assigned to another licensee must be accompanied by a letter stating that the authorized SID user concurs with the request.

5.0 RESPONSIBILITIES OF CELLULAR SID ADMINISTRATORS

These general guidelines will be used by the Cellular SID Administrators in reviewing and processing requests for a SID. A Cellular SID Administrator will:

- 5.1 Assign a cellular SID to any FCC licensed cellular carrier who submits the appropriate request for a SID assignment.
- Assign SIDs in a fair, timely and impartial manner to any applicant that meets the criteria for assignment (See Section 6.0).
- 5.3 Assign SIDs on a first come, first served basis from the available pool.
- 5.4 Request the minimum information necessary to make a SID assignment.
- Assign SIDs on a per FCC license basis, generally one SID per license. Resellers are not eligible for SID assignment.
- Request justification from a licensee when they request to use a total of more than three (3) SIDs associated with one license. SID Administrator will not unreasonably withhold assignment. If deemed necessary by the administrator(s), the licensee's request may be referred to the Bureau for guidance.
- 5.7 Treat sensitive information received from applicants as proprietary and confidential, and not to be shared with non-administrator personnel.
- 5.8 Ensure that fees charged for services are fair and reasonable. Make information on services, fees, and response times readily available to the public.

- 5.9 Provide the Public with access to a complete listing of assigned SIDs updated annually.
- 5.10 In the event an administrator terminates its obligations as a SID Administrator pursuant to Section 10 of the FCC's Memorandum of Understanding, that administrator will provide to any one of the remaining SID Administrators all information regarding any outstanding SID assignments or modifications and copies of any current or archived supporting documentation gathered from carriers for the purposes of SID assignments. Archived data should be maintained for a period of not less than one year.

6.0 RIGHTS AND RESPONSIBILITIES OF CELLULAR SID APPLICANTS AND ASSIGNEES

Licensees requesting or utilizing a Cellular SID assignment shall:

- 6.1 Keep administrative information current with an administrator.
- 6.2 Have the right to request a SID from any one of the recognized Cellular SID Administrators.
- 6.3 Comply with all applicable regulations.
- 6.4 Utilize its assigned SID in such a manner that is consistent with the Commission's Rules for the provision of seamless service across urban, suburban and rural markets.
- 6.5 Provide justification to the administrator if a new SID assignment would bring the total number of SIDs associated with one license to more than three (3).
- A request to use a SID assigned to another licensee must be accompanied by a letter from the authorized SID user concurring with the request to share its assigned SID.

7.0 CELLULAR SID ASSIGNMENT PROCEDURES

SID Assignments:

- 7.1 All SID Administrators will make available on their own websites a standard onepage form that can be downloaded and completed by requesting licensees. SID Administrators may opt to make on-line data entry available.
- 7.2 To request a SID, a licensee must select a SID Administrator, complete a form, and forward the form and appropriate payment to their chosen SID Administrator. SID Administrators may opt to provide licensees with the service of completing the request form on a licensee's behalf.
- 7.3 SID Administrators will validate requests by comparing the licensee data associated with the call sign to license records on the FCC web site. Before submitting a request to the central database, SID Administrators will check the

- database to determine if the request is consistent with Section 6.0 of these guidelines.
- 7.4 When it is determined that a licensee's request is valid and the appropriate fee has been received, the SID Administrator will submit the completed request form to the secure central database. By agreement among the initial SID Administrators, one SID Administrator will be designated the Central Database Administrator, as discussed in section 7.13 below.
- 7.5 The SID Administrator will submit a request to the Central Database Administrator, who will be responsible for assigning the SID and notifying the submitting SID Administrator per contractual agreement. The SID Administrator will provide the assigned SID to the requesting licensee per response time listed on its own website.

Multiple SID Verification/Reclamation:

- 7.6 If the allocation of an additional SID would exceed three (3), the administrator must carefully evaluate the justification provided by the licensee. SID Administrator may seek Bureau guidance prior to assignment of another SID.
- 7.7 If a SID(s) has already been assigned to this call sign, the SID Administrator must ensure that the requesting licensee has indicated on its request form whether the current SID(s) associated with this license is still in use and should be maintained in the database.
- 7.8 If the SID(s) associated with a license is not to be maintained, and the SID(s) is not being shared with another licensee, the Central Database Administrator will flag those entries as deleted and move the reclaimed SID to the available pool. The reclaimed SIDs will be assigned on a first-in first-out basis only after all other "clean" SIDs have been assigned.

Shared Use and Administrative Changes:

- 7.9 The SID shared-use process will follow the SID assignment process guidelines with the exception that the SID Administrator must obtain a letter of authorization from the entity assigned the current SID indicating that it wishes to allow its SID to be associated with another licensee.
- 7.10 Licensees may initiate administrative changes to existing records by contacting any SID Administrator. SID Administrators will follow the SID assignment guidelines when submitting changes to the central database.

Coordination among SID Administrators and the Role of the Central Database Administrator:

- 7.11 The initial SID Administrators have developed a process for discussing and resolving issues. The administrators expect the process to continue and to include any new administrators the FCC may designate.
- 7.12 SID Administrators will confer as needed via conference call, e-mail, and other mutually agreeable means on issues relating to all items addressed in these guidelines or otherwise pertaining to SID administration. If an issue requires group consensus for resolution, consensus will be achieved by agreement of a simple majority of the total number of designated SID Administrators. If consensus cannot be reached, the group will present the issue to the Bureau for further guidance.
- 7.13 In order to maintain SID information in a central database, the initial SID Administrators have chosen to designate one SID Administrator as the Central Database Administrator. The role and responsibilities of the Central Database Administrator will be defined by these guidelines and by contractual agreements between the Central Database Administrator and the other SID Administrators.
- 7.14 Any SID Administrator may propose to take over Central Database Administrator responsibility on a quarterly basis by presenting its proposal to the other administrators and scheduling a conference call for group discussion. A consensus vote is required for any change.
- 7.15 If a SID Administrator believes the Central Database Administrator is not performing its duties pursuant to the adopted guidelines, the Administrator may call for a replacement of the Central Database Administrator. A consensus vote is required for a change in the Database Administrator. Parties must seek to resolve any disputes according to the terms of the contractual agreements with the Central Database Administrator, and through negotiations with the Central Database Administrator and other SID Administrators. Resolution may be sought from the Bureau only if parties fail to agree.
- 7.16 In the event that a dispute is brought before the Bureau, the Bureau may require the Central Database Administrator to provide the dissenting party with a small number of SIDs enabling the dissenting party to continue as an administrator until the Bureau renders its decision. Pending review and resolution of the dispute, the dissenting party and the Central Database Administrator must continue to coordinate with one another to maintain an up-to-date Cellular SID database. Once a decision has been reached by the Bureau, the dissenting party and the Central Database Administrator shall work together to resolve the issues as directed by the Bureau.

8.0 MAINTENANCE OF GUIDELINES

- 8.1 Cellular SID Administrators may request modifications to the Guidelines by sending their request to the Bureau. Requests to modify the Guidelines should be based on a consensus agreement of all SID Administrators.
- 8.2 The Bureau may initiate changes to the Guidelines by providing the administrators with at least 30 days written notice.