



National Pooling Administration

Contract #CON07000005

Change Order Proposal #2

**(INC Issue #578 – Update TBPAG to Limit Timeframe for Block
Reservations)**

June 13, 2008

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1 Introduction

1.1 Purpose and Scope

In accordance with NeuStar's National Pooling Administration contract¹ and our constant effort to provide the best support and value to both the FCC and the telecommunications industry, NeuStar, as the National Pooling Administrator (PA), hereby submits this change order proposal to the Federal Communications Commission (FCC) for approval. This change order complies with the contractual requirements set forth in Clause C.1 of the CONTRACT FOR POOLING ADMINISTRATION SERVICES FOR THE FEDERAL COMMUNICATIONS COMMISSION, effective August 15, 2007, which reads as follows at Section 2.5.4:

2.5.4 Modifications of Guidelines

The PA shall participate in the development and modification of guidelines and procedures, which may or may not affect the performance of the PA functions. These changes may come from regulatory directives and/or industry-initiated modifications to guidelines. In addition, new guidelines may be developed as appropriate to comply with regulatory directives. The PA shall implement any changes determined to be consistent with regulatory directives.

The PA shall:

- Provide, in real time, technical guidance to ensure processes and procedures are effective in meeting the goals of the change.
- Provide issues and contributions, and be prepared to discuss at INC meetings how the proposed change promotes numbering policy and/or benefits the NANP and how the change will affect the PA's duties, obligations and accountability.
- Assess and share in real time (i.e., during discussion) the cost implications and administrative impact of the change upon the PA's duties and responsibilities in sufficient detail as needed by the INC.

When the INC places any changes to its guidelines in final closure, the PA shall submit an assessment regarding the impact of scope of work, time and costs to the INC, the NANC and the FCC within 15 calendar days. The PA shall post changes in procedures on its web site prior to the change taking effect.

Specifically, the PA shall:

- Notify all interested parties when guidelines have changed.
- Interpret guideline changes and impact upon processes.
- Identify implementation date or effective date.
- Provide notification of new forms or tools that may be required.
- Identify a Single Point of Contact (SPOC) within the PA to answer questions.

The NANC shall be consulted at the FCC's discretion regarding the suggested implementation date to determine the likely impact on service provider processes and

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systems (i.e., whether it would be unduly burdensome or would unfairly disadvantage any service provider or group of service providers per the PA's obligations and NANP administrative principles). The PA shall also seek input on implementation dates from service providers that log in to PAS and vendors that interface with PAS.

2 Industry Numbering Committee (INC) Issue

As a result of concerns raised by the industry regarding the length of time for block reservations, members of the INC brought in an issue to address the timeframe for block reservations. The INC issue statement is reproduced below:

INC Issue Statement:

At INC 97 under Issue 562 – Block Reservations, INC agreed to add text to the TBPAG to allow an SP to reserve blocks while awaiting outcome of its safety valve waiver request submitted to the appropriate state commission or regulatory authority. The block will be held in reserved status for 6 months unless the SP notifies the PA to release the block from reserved status or requests the block in conjunction with its approved safety valve waiver. INC may wish to reconsider the 6-month timeframe to ensure blocks aren't unavailable for assignment any longer than truly necessary to meet SPs' needs.

3 Industry Numbering Committee (INC) Resolution

On May 30, 2008, the INC placed Issue 578 - *Update TBPAG to Limit Timeframe for Block Reservations* into final closure, with the following language.

Resolution from INC:

The following text changes were made to the noted sections within the TBPAG:

- 3.12 An SP may request to reserve a block(s) when a ~~state safety valve~~ waiver request has been submitted to the appropriate regulatory authority. The SP shall provide a statement of certification including the date the waiver was submitted, the denial tracking number from PAS for the waiver request (if available) and the tracking number from PAS of the reservation request to the PA via fax or email. Blocks shall remain in a reserved status for ~~six-three (63)~~ months from the date the Part 3 is approved for the block reservation request, unless the ~~block reservation~~ is assigned or ~~the reservation is~~ canceled ~~or extended~~ prior to the block reservation expiration date. An SP may request one three-month reservation extension if the appropriate regulatory authority has not acted upon the SP's waiver request by the original block reservation expiration date. An SP shall cancel its block(s) reservation immediately when the SP determines that it

no longer needs the block(s) or the appropriate regulatory authority denies the SP's ~~state-waiver request.~~ [Issue 578]

- 4.5 An SP may request to reserve a block(s) when a ~~state-safety valve~~ waiver request has been submitted to the appropriate regulatory authority. The SP shall provide a statement of certification including the date the waiver was submitted, the denial tracking number from PAS for the waiver request (if available) and the tracking number from PAS of the reservation request to the PA via fax or email. Blocks shall remain in a reserved status for ~~six-three (63)~~ months from the date the Part 3 is approved for the block reservation request, unless the ~~block reservation~~ is assigned or ~~the reservation is~~ canceled ~~or extended~~ prior to the block reservation expiration date. An SP may request one three-month reservation extension if the appropriate regulatory authority has not acted upon the SP's waiver request by the original block reservation expiration date. An SP shall cancel its block(s) reservation immediately when the SP determines that it no longer needs the block(s) or the appropriate regulatory authority denies the SP's ~~state-waiver request.~~ [Issue 578]

8.3.5 The following criteria shall be used by the PA in reviewing a thousands-block reservation request from an SP that has submitted a safety valve waiver to the appropriate regulatory authority:

- a) The applicant shall provide a statement of certification including the date the waiver was submitted, the denial tracking number for the waiver request from PAS (if available) and the tracking number from PAS of the reservation request to the PA via fax or email.
- b) The PA shall process requests for block reservations within 7 calendar days of receiving the request.
- c) Blocks shall remain in a reserved status for ~~six-three (63)~~ months from the date the Part 3 is approved for the block reservation request, unless the ~~block is assigned, or the~~ reservation is ~~assigned~~ ~~or~~ canceled ~~or extended~~ prior to the block reservation expiration date.
 - d) The PA shall send an e-mail reminder to the SP 7 calendar days prior to the block reservation expiration date, advising the SP that the reserved block will be placed back into the pool one (1) calendar day after the block reservation expiration date if the reserved block has not been assigned or the reservation has not been canceled or extended.
 - ~~d) Reserved blocks that are not assigned or cancelled by the block reservation expiration date shall be placed back in the pool one (1)~~

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~~calendar day after the block reservation expiration date.~~ **[Issue 578]**

4 The Proposed Solution

The National Pooling Administrator has reviewed the changes to the TBPAG to determine whether and how it will impact either the pooling operations or the Pooling Administration System (PAS). As a result of our assessment, we developed the following proposed solution to address the changes that the INC recommended, in a cost-effective and efficient manner.

Under the amendments to the TBPAG relating to reserved blocks, PAS will be modified to change the block reservation timeframe from six months to three months. Also, to address the additional tasks contained in the amendments to the TBPAG, PAS will be modified to allow the SP to request a one time three-month extension for blocks previously reserved that have not yet passed the block reservation expiration date. There will be no documentation required from the SPs for this extension request. PAS must be further modified to automatically send an email notice to the SP seven calendar days prior to the block reservation expiration date informing the SP that the blocks currently reserved will be placed back into the pool one calendar day after the block reservation expiration date if the SP has not requested (1) that the reserved block be either assigned or extended, or (2) that the reservation be canceled.

Block reservations are allowed only for safety valve waiver requests.

User manuals will be updated as appropriate.

5 Assumptions and Risks

Part of the Pooling Administrator's assessment of this change order is to identify the associated assumptions and consider the risks that can have an impact on our operations.

This change order affects only the system, and would have no impact on our day-to-day operations.

6 Cost

In developing this proposal, we considered the costs associated with implementing the proposed solution, including the resources required to complete discrete milestones on a timeline for implementation. The timeline includes preparation, development, testing, proper documentation updates, monitoring, and execution of the solution. A change to the guidelines shortening the reservation time from 6 months to 3 months would not have necessitated a change order. However, the additional system modifications permitting the additional three-month extension and the reminder email do require a change order.

The cost of modifying the system to implement the changes to the TBPAG will be \$

7 Conclusion

This change order proposal presents a viable solution that addresses the amendments to the TBPAG and is consistent with the terms of our contract. We respectfully request that the FCC review and approve this change order.