



National Pooling Administration
Contract #CON07000005
Change Order Proposal #5
(INC Issue #602 – Checking returned block in the NPAC)

November 21, 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

¹ FCC Contract Number CON07000005

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 increase in over-contaminated blocks in the industry pool, the PA brought in an issue to address the situation. The INC issue statement is reproduced below:

INC Issue Statement:

The PA has recently been made aware of a number of returned blocks for which the contamination level was incorrect on the Part 1A, and the blocks were actually over 10% contaminated. This has been causing additional work for both the SP who has been assigned the over-contaminated block, and the PA. Not only must the correct contamination level be determined, but in many cases the block must be exchanged for a new block that is not over-contaminated.

3 Industry Numbering Committee (INC) Resolution

On November 7, 2008, the INC placed Issue 602 – *Checking Returned Blocks in NPAC* into final closure, with the following language:

Resolution from INC:

The following text changes were made to TBPAG Sections 9.1.5 and 9.2.7:

9.1.5 In cases where the block holder is exiting the market and voluntarily returns a block indicating that it is over 10% contaminated (101 TNs or more), the SP shall state in the remarks field of the Part 1A that it is exiting the market. The PA shall request an ad hoc report from the NPAC, generated during off-peak hours, that identifies the SPs and associated quantities of ported TNs in the returned block. This information shall assist the PA in re-allocating the block, if TNs ported to other SPs are found within the NPA-NXX-X block. The PA may use these reports to provide each potential block holder with the total number of ported TNs it has, number of SPs with ported TNs, and the total number of ported TNs overall.

If the block being returned by the SP is over 10% contaminated and the SP does not indicate it is exiting the market, the PA shall deny the return.

9.2.7 In cases where pooled blocks are voluntarily returned, the PA shall request an ad hoc report from NPAC within 7 calendar days of providing a Part 3 suspend to the block

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holder. Blocks may only be voluntarily returned with over 10% contamination when the SP is exiting the market (see Section 9.1.5).

If the block being returned by the SP is over 10% contaminated and the SP does not indicate it is exiting the market, the PA shall deny the return.

If the only active or pending LNP ports on the block are intra-service provider ports (ISPs), the PA shall, within 7 calendar days of receiving the ad hoc report from the NPAC, process a Part 3 denial. The PA shall provide on the Part 3 the reason for the denial.

***Unedited text omitted from 9.2.7

4 The Proposed Solution

The National Pooling Administrator has determined that the amendments to the TBPAG will affect the day-to-day pooling operations and the Pooling Administration System (PAS). The PA will now be required to check the porting information in the NPAC for all block returns. This will necessitate internal changes to PAS relating to how the PA processes block returns. 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.

All returned blocks will be suspended until the weekly report is received from the NPAC showing the contamination level of those blocks. Based upon the content of the report, the individual pooling administrators will determine if the block return request can be approved, if it should be denied, or if an email needs to be sent to the SPs that have ported TNs out of the block(s) advising them that the block is being returned and asking them to take assignment of the block. PAS will track whether an email has been sent and the types of emails that have been sent, and will also automatically update the block contamination information at the time the PA approves the block return.

After the changes have been implemented in PAS, the PA will perform another manual one-time scrub of all available blocks in PAS by comparing the data against the NPAC database to determine the correct contamination status of each available block.² Based on the findings, the PA will contact each related service provider where it is determined that a returned block is over-contaminated, perform the work necessary to re-allocate those blocks, and make the appropriate updates in PAS.

User manuals will be updated as appropriate.

² The PA performed such a one-time scrub in June 2006, as discussed in Change Order 41 LNPA WG 24 and CO/NXX Issue #364 – “Modification to Procedures for Code Holder/LEAG Assignee Exit” in the previous contract.
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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.

Assumptions:

1 Both the INC and the NOWG agree that the block contamination levels in PAS and the NPAC should be cross-referenced in conjunction with the other activities identified in this Change Order proposal, to assure that the information in PAS is accurate.

2 This proposed solution will impact our day-to-day operations because it will take a significant amount of staff time to: (1) do the initial comparison of the NPAC and PAS data regarding block contamination levels, (2) send notifications to the appropriate service providers requesting re-allocation, and (3) administer the responses from the industry to actually get the blocks re-assigned. Because of staffing constraints under this contract, we anticipate that the process will take longer than the first NPAC scrub, conducted in 2006.

This change order affects both the system and 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.

The cost of modifying the system to conform to 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.