

National Pooling Administration

Contract #CON07000005

Change Order Proposal #7

**(INC Issue #592 – Changes to the TBPAG and COCAG for Mass
Update Modifications)**

January 10, 2009

Table of Contents

1	Introduction.....	3
2	Industry Numbering Committee (INC) Issue	4
3	Industry Numbering Committee (INC) Resolution	4
4	The Proposed Solution.....	7
5	Assumptions and Risks	8
6	Cost	8
7	Conclusion	8

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 Issue Statement

To facilitate customer convenience during the initial national pooling contract, the Pooling Administrator pro-actively developed a process to enable service providers to use an Excel spreadsheet to submit large numbers of records that required modifications. The process necessitated manual involvement at the system engineering level. The mass modify process was not required by the contract or the industry guidelines, but decreased the number of manual entries that any service provider had to perform when, for example, making large numbers of OCN or switch/POI changes. The Pooling Administrator's process applied when carriers were modifying more than 100 records.

In recent months, service providers indicated a desire to submit mass modifications of less than 100 records. As a result, an issue was brought to the Industry Numbering Committee (INC) to address the situation. The INC issue statement is reproduced below:

INC Issue Statement:

When SP's have to modify multiple LRN's, switching or tandem information at one time, each individual record has to be updated separately. Allowing mass modifications on multiple records will decrease the amount of manual work on the SP and also reduce the chances for entering incorrect information.

3 Industry Numbering Committee (INC) Resolution

On January 2, 2009, the INC placed Issue 592– *Changes to the TBPAG and COGAG for Mass Update Modifications* into final closure, with the following language:

Resolution from INC:

The following changes were made to the TBPAG and COGAG:

TBPAG Sections 4.1 and 8.5.1:

4.1 Code Holder Responsibilities

A Central Office (CO) Code Holder is an assignee of an NXX code which was allocated by the CO Code Administrator. When an NXX Code becomes pooled, the Code Holder becomes the LERG Assignee.

- a) identify eligible thousands-blocks for donation to the industry inventory pool upon initial establishment of the industry inventory pool pursuant to Section 7.2.5;

- b) make required updates to BIRRDs with the switch information as appropriate (i.e., ongoing switching entity/POI changes) after creation of the Block Code record (BCD), for their assigned thousands-blocks within pooled NXX codes (See Section 8.5.2) and;
- c) submit changes or disconnects for pooled NXXs to the PA. Changes or disconnects for non-pooled NXXs in a pooling rate center should be sent to NANPA, unless the PA received the original request for the non-pooled NXX.

d) If there are 50 or more codes that need modifications on intra-company OCN changes, switching entity/POI changes, or tandem modifications, a mass modification spreadsheet can be sent to NANPA. Contact NANPA for the most recent spreadsheet.

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e) confirm, prior to donating the thousands-block to the industry inventory pool, that:

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- 1) all unavailable TNs within contaminated thousands-blocks have been intra-service provider ported;
- 2) the associated NPA/NXX is currently available for call routing, is flagged as LNP capable in the LERG Routing Guide and the NPAC, and the NPA-NXX query triggers are applied in all switches and reflected in the appropriate network databases (e.g., STP routing tables);
- 3) the NXX-assigned switch is currently LNP-capable and will process terminating traffic appropriately; and
- 4) interconnection facilities have been established between the NXX-assigned switch and other interconnecting networks.

f) become a LERG Assignee at the Block Donation Date (see Section 7.1).

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An entire NXX code dedicated for a single customer's use may be classified as a non-pooled code at the discretion of the SP. The SP will be considered the CO Code Holder by leaving the pool indicator field blank in Section 1.5 of the CO Code Part 1. In addition, the SP should write "Non-pooled code for dedicated customer" in Section 1.7 of the Part 1.

8.5 Ongoing Administration of Allocated Thousands-Blocks and Notification of LERG Routing Guide Changes

8.5.1 The information associated with a thousands-block assignment or thousands-block(s) being retained may change over time. The PA must be notified of an OCN, Switch ID or Block Effective Date change for thousand-blocks which have already been assigned. The requested changes should be submitted via the Thousands-Block Application Forms, Part 1A, and when necessary, the Part 1B. For data integrity reasons, the PA must be informed of these types of changes to

ensure that the record of the entity responsible for the thousands-block and the data associated with the thousands-block is accurate.

If there are 50 or more blocks that need to be modified for intra-company OCN changes, switching entity/POI changes, or Part 1B modifications, a mass modification spreadsheet can be sent to the PA. Contact the PA for the most recent spreadsheet.

Note: Mass modifications only update data in PAS. SPs are responsible for all updates to BIRRDS, NPAC and any other affected systems or databases.

COCAG:

6.3.1 Information Changes

The information associated with a code assignment may change over time. Such changes may occur, for example, because of the transfer of a code to a different company. The CO Code Administrator must be notified of any changes to the information in Part 1 of the CO Code (NXX) Assignment Request Form. This includes changes such as, but not limited to, the tandem homing arrangement, OCN, switching entity/POI and rate center. For OCN changes due to merger/acquisition, the SP must so state on the Part 1 form. If the applicant is requesting multiple changes, the applicant should indicate all requested changes in Section 1.4 of the Part 1 form.

SPs that change the rate center for a previously assigned NXX that has not been activated shall be required to first demonstrate the need for the NXX in the new rate center. For this change, SPs must first supply a new CO Code Assignment Months to Exhaust Certification Worksheet - TN Level to the CO Code Administrator prior to making any changes to BIRRDS for the affected NXX code. Accordingly, the CO Code Administrator(s) must be informed of these changes to ensure that an accurate record of the code holder/ LERG Routing Guide assignee responsible for the code and the data associated with the code is maintained so as not to jeopardize data integrity. The CO Code Administrator shall verify the retention of the NXX codes using the Months to Exhaust Certification Worksheet - TN Level prior to changes being made to the rate center in the TRA databases.

If there are 50 or more codes that need modifications on intra-company OCN changes, switching entity/POI changes, or tandem modifications, a mass modification spreadsheet can be sent to NANPA. Contact NANPA for the most recent spreadsheet.

Note: Mass modifications only update data in NAS. SPs are responsible for all updates to BIRRDS, NPAC and any other affected systems or databases.

SPs that wish to move CO codes from one rate center to another must submit a Part 1 to the CO Code Administrator. Upon receipt of the Part 1 for an NXX that has been activated, the CO Code Administrator will request that the NPAC produce an ad hoc report, generated during off-peak hours, that identifies the SPs and associated quantities of ported TNs or pending ports within the code(s). The CO Code Administrator will not request an ad hoc report if the SP is requesting a rate center change for a code that has not reached its LERG Routing Guide effective date.

If the report shows that there are ported TNs or pending ports, then the CO Code Administrator will issue a Part 3 Denial to the applicant. If the report shows that there are no ported TNs or pending ports, then the CO Code Administrator will issue a Part 3 Acceptance to the applicant with instructions to the Applicant to immediately remove the NXX from the NPAC to ensure that no porting occurs between the time the ad hoc report was produced and the effective date of the rate center change. On the effective date of the rate center change, the Applicant must immediately add the NXX to the NPAC to ensure that porting can resume.

4 The Proposed Solution

The National Pooling Administrator has determined that the amendments to the TBPAG will affect the Pooling Administration System (PAS).

The minimum number of records that can be submitted as a mass modify has been dropped from 100 modifications to 50 modifications. Also, as a result of the changes made to the guidelines, the PA will now need to accept mass modifications for Part 1B modifications

The current Excel spreadsheet used for mass modifies will be augmented to include all Part 1B fields. For any mass modifications to the fields on the Part 1B form, the information will be updated only in the PAS database and the Part 1B form will not be sent to the NPAC. Since these mass modify submissions will only update PAS, updates to BIRRDs, NPAC, or any other affected system or database are the responsibility of the service provider. Therefore, the PA is adding a disclaimer statement both to the mass modification spreadsheet and to the remarks section of the Part 3 form, to ensure that users understand that the only database being updated is PAS.

A new tool will be added to PAS to allow the PA to upload the spreadsheets into the system automatically.

Mass modifications for non-pooled and pooled codes will continue to go directly to NANPA; however since both pooled and non-pooled code information is maintained in PAS, a new tool will be added to PAS to allow the PA to update the PAS code table after the mass modification is processed successfully in NAS.

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.

Assumptions:

1. The decrease in the minimum number of records permitted under the mass modify process will increase the number of mass modifies that are submitted.
2. This will impact our day-to-day operations, in that any errors in the mass modify spreadsheets require research on the part of the pooling administrators.

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.