

National Pooling Administration

Contract #CON07000005

Change Order Proposal #9

(INC Issue #632– Updates to the Dedicated Code Section of the TBPAG
and COCAG)

August 7, 2009

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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 Issue Statement

Currently, when a service provider submits a Part 4 for a dedicated customer, only one Part 4 is required; it is assumed that the customer is using the entire code. However, SPs are returning blocks out of the code, therefore breaking up the dedicated customer code into blocks. The Pooling Administration System (PAS) must be updated to accommodate this change of process.

The INC issue statement is reproduced below.

INC Issue Statement:

The TBPAG and COCAG currently state: "The NXX code dedicated for a single customer's use will become a pooled code if and when thousands-blocks from the NXX code are donated to the pool." This implies that SPs donate from a NXX code that was assigned for a dedicated customer. When a NXX code is assigned for purposes of a dedicated customer, the NXX code is automatically designated as pooled in PAS, however, the SP may request the NXX code to be designated as non-pooled in BIRRDs. With this option, the SP may submit a CO Code Part 4 directly to NANPA when the NXX code is flagged as non-pooled in BIRRDs.

Currently the TBPAG does not address the following items when a thousands-block(s) is returned from a NXX code that was originally assigned for a dedicated customer:

1. A CO Code Part 4 should be on file prior to the SP returning any of the thousands-block from the NXX code.
2. PSTN confirmation is currently not required on an NXX code assigned for a dedicated customer
3. If the NXX code was previously designated as non-pooled in BIRRDs, the NXX code status must be updated to pooled, and the SP must build the NXD-X records in BIRRDs for any thousands-blocks retained by the SP.

3 Industry Numbering Committee (INC) Resolution

On July 23, 2009, the INC placed Issue 632 – *Updates to the Dedicated Code section of the TBPAG and COCAG* into final closure, with the following language:

Resolution from INC:

The following text changes were made to the *Thousands-Block Pooling Administration Guidelines* (TBPAG) Section 3.2 and *Central Office Code Administration Guidelines* (COCAG) Section 3.1:

TBPAG:

- 3.2 A pooling SP's requirement for an entire NXX Code (i.e., 10,000 TNs) to satisfy the numbering needs for a single customer shall be obtained from the PA (see Section 7.5.3). 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 selecting the pool indicator of "no" in Section 1.5 of the CO Code Part 1.

If this option is selected, but the SP did not follow the guideline direction for requesting the pooling indicator be marked as non-pooled on the Part 1 form, the SP must e-mail the PA and NANPA prior to the original Part 3 effective date in order for the NXX code dedicated for a single customer's use be classified as a non-pooled code. The SP is reminded that a portability indicator may be required. Further, the SP is reminded that the LERG effective date reflecting the NXX code as non-pooled may be different than the original effective date.

The NXX code dedicated for a single customer's use will become a pooled code if and when thousands-blocks from the NXX code are ~~donated~~ returned to the pool. A CO Code Part 4 shall be on file prior to an SP returning any thousands-block from an NXX code dedicated for a single customer's use. The SP also shall include in the remarks field of the Part 1A disconnect that the NXX code has been activated in the PSTN, loaded in the NPAC, and all other LERG Assignee responsibilities have been fulfilled. If the NXX code was marked as non-pooled in BIRRDS, the PA shall change the NXX code to a pooled status and create the BCDs in BIRRDS for the thousands-blocks still assigned to the SP. The SP then shall create the NXD-X records in BIRRDS for its assigned thousands-blocks.

COCAG:

- 3.1 CO codes (NXXs) are assigned to entities for use at a Switching Entity or Point of Interconnection they own or control. Where thousands-block number pooling has been implemented, an entity assigned a CO Code is designated as the "LERG Assignee." 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 selecting the pool indicator of "no" in Section 1.5 of the CO Code Part 1.

If this option is selected, but the SP did not follow the guideline direction for requesting the pooling indicator be marked as non-pooled on the Part 1 form, the SP must e-mail the PA and NANPA prior to the original Part 3 effective date in order for the NXX code dedicated for a

single customer's use be classified as a non-pooled code. The SP is reminded that a portability indicator may be required. Further, the SP is reminded that the LERG effective date reflecting the NXX code as non-pooled may be different than the original effective date.

The NXX code dedicated for a single customer's use will become a pooled code if and when thousands-blocks from the NXX code are ~~donated~~-returned to the pool. A CO Code Part 4 shall be on file prior to an SP returning any thousands-block from an NXX code dedicated for a single customer's use. The SP also shall include in the remarks field of the Part 1A disconnect that the NXX code has been activated in the PSTN, loaded in the NPAC, and all other LERG Assignee responsibilities have been fulfilled. If the NXX code was marked as non-pooled in BIRRDs, the PA shall change the NXX code to a pooled status and create the BCDs in BIRRDs for the thousands-blocks still assigned to the SP. The SP then shall create the NXD-X records in BIRRDs for its assigned thousands-blocks.

Central office codes (NXX), as part of NANP telephone numbers, are to be assigned only to identify initial destination addresses in the public switched telephone network (PSTN), not addresses within private networks.

4 The Proposed Solution

The National Pooling Administrator has determined that the above-stated amendments to the TBPAG will affect both the PAS and our day-to-day operations, which will need to be modified.

Pooling Administration System Updates:

A new validation will be added to PAS to ensure that a Part 4 is on file for the code, when a block is returned from a code that was originally assigned for a dedicated customer. When a request for a block disconnect is submitted, PAS will validate that the Part 4 is on file. If the Part 4 is not on file, then PAS will return an error message to the user indicating that the block disconnect cannot be submitted until the Part 4 is on file.

PAS will also include a new indicator on the PA's Part 3 screen showing that the block being returned is from a code previously assigned for a dedicated customer, to assist the PA in processing the request.

When the block disconnect is approved, PAS will disassociate the block(s) being returned from the code previously assigned for a dedicated customer. This will allow each such block to be recognized as an individual block for reclamation purposes.

Operational Changes:

The individual pooling administrators (PAs) will perform a manual validation by reviewing the remarks on the disconnect request. The SP must state in the *Remarks* field of the Part 1A that the code has been activated in the PSTN and loaded in NPAC, and that all other LERG Assignee responsibilities have been met; otherwise the request will be denied.

When the block disconnect is approved, if the code was marked as a non-pooled code in BIRRDs, the PA will need to update the Thousands Block Pooling indicator on the ACD screen and create BCD records for the blocks the code holder is retaining in BIRRDs.

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 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.