

National Pooling Administration

Contract #CON07000005

Change Order Proposal #13

(INC Issue #604– Code Holder vs. LERG Assignee)

January 14, 2010

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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

The terms *LERG Assignee* and *Code Holder* have been used in Industry Numbering Committee (INC) documents for many years. The INC has decided to use only the term *Code Holder*, eliminating the use of *LERG Assignee*. The change is being made throughout all the INC documents, including the *Thousands-Block Pooling Administration Guidelines* (TBPAG). The Pooling Administration System (PAS) must be updated to accommodate this change of term.

The INC issue statement is reproduced below.

INC Issue Statement:

The terms Code Holder and LERG Assignee are sometimes being confused and used interchangeably. In today's environment, it may no longer be necessary to maintain separate terms and definitions.

3 Industry Numbering Committee (INC) Resolution

On January 8, 2010, the INC placed Issue 604 –*Code Holder vs. LERG Assignee* into final closure, with the following language:

Resolution from INC:

The following revisions were made to the definition of the term Code Holder:

Code Holder – An assignee of a ~~an~~ **pooled or non-pooled** NXX code ~~which that is assigned was allocated~~ by the CO Code Administrator. ~~When an NXX code becomes pooled, the Code Holder becomes the LERG Assignee. The responsibilities of an assignee for a pooled NXX are defined in Section 4.2.1 of the Thousands Block Number (NXX-X) Pooling Administration Guidelines (TBPAG) and for a non pooled NXX are defined in Section 6.3 of the Central Office Code (NXX) Assignment Guidelines (COAG). A given Code Holder is identified in the LERG Routing Guide as the NPA-NXX-A (Assignee) OCN record holder.~~

The glossaries of the NPA Code Relief Planning and Notification Guidelines, the CO Code Assignment Guidelines, and the Thousands-Block Pooling Administration Guidelines were updated with the

revised definition of Code Holder, and the term LERG Assignee was deleted from their glossaries.

The attached edits were made to the CO Code Assignment Guidelines (COCAG) (from contribution LNPA-585rev), the COCAG Appendix C (from contribution LNPA-585rev), and the COCAG Part 4-PA (from contribution LNPA-584att2):



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The attached edits were made to the Thousands-Block Pooling Administration Guidelines (TBPAG) (from contribution LNPA-602rev), the TBPAG Part 5 (from contribution LNPA-584att1), and the TBPAG Part 1B (from contribution LNPA-581att2):



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The following edits were made to the LRN Assignment Practices (from contribution LNPA-586):

2. A service provider will establish one (1) LRN per LATA from an assigned NXX for each recipient switch or POI in the number portability capable network. Additional LRNs may be used for internal purposes. Further, additional LRNs are not required to identify US wireline rate centers. A unique LRN may be assigned to every LNP equipped switch or POI (and potentially to each CLLI listed in the Telcordia® LERG™ Routing Guide).

Requesting an additional NXX to establish an LRN in certain instances may be justified but precautions need to be taken to ensure number resource optimization. The following points should be considered prior to requesting a new NPA-NXX for the purpose of establishing an LRN:

- a. The requesting service provider uses an existing code already homed to the tandem where the LRN is needed for the POI.
- b. Once the NXX Code is assigned, the Code Holder-~~LERG-assignee~~ must return any blocks not justified for retention in its inventory.
- c. When there are multiple tandems owned by different SPs in a single LATA, the requesting SP may obtain a new NXX in order to establish an LRN for each subtending POI.

- d. Regulatory waivers granted to ILECs to carry local calls across a LATA boundary may exist. In such instances, SPs may be justified in establishing an additional LRN to properly route calls.
 - e. A unique LRN is required for each NPAC region within a single LATA when a single switch serves multiple NPAC regions.
10. For thousands-block number pooling, the LRN shall only be selected and used by the Code Holder~~LERG assignee~~ from its assigned/retained 1000 block(s).

4 The Proposed Solution

The National Pooling Administrator has determined that the above-stated amendments to the TBPAG will require the following modifications to PAS.

Pooling Administration System Updates:

Changing *LERG Assignee* to *Code Holder* will require that all references to the term *LERG Assignee* in PAS be replaced with the term *Code Holder*. The following items in PAS will be updated: multiple forms (Part 1B, Part 4 and Part 5), tables (error messages and standard verbiages), reports, field names on the various screens, and the Confirmation Code Activation PSTN reminder.

5 Assumptions and Risks

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

This change order affects only the system and not 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 TBPAG changes 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 proposal.