

National Pooling Administration Contract #CON07000005 Change Order Proposal #15

(INC Issue #670– Remove Attaching Part 2 forms from CO Code request (Part 1))

March 18, 2010

Neustar, Inc.

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1. Introduction

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 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

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¹ FCC Contract Number CON07000005

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 issue statement for INC Issue 670 is entitled *Remove Attaching Part 2 forms from CO Code request (Part 1)*. Section 1.8 of the CO Code Part 1 form contains four check boxes relating to the attachment of additional documentation to the form, including the Part 2. Issue 670 proposes removing these check boxes from the CO Code Part 1 to correspond to similar changes that were made to the CO Code Part 3 under INC Issue 428 as part of the original NAS development. In addition, several of the footnotes on the form were updated during the INC discussion.

The INC issue statement is reproduced below.

INC Issue Statement:

The resolution to Issue 428: INC Form Changes to Accommodate NAS (NANP Administration System) Development, including removal of references to attaching Part 2 forms to be input into the TelcordiaTM Business Integrated Routing and Rating Database System (BIRRDS).

The Part 1 form still includes references to attaching Part 2 forms. The process of associating the NAS system to attaching and/or inputting Part 2 information in BIRRDS is no longer appropriate in today's environment, and should be removed.

3. Industry Numbering Committee (INC) Resolution

On March 5, 2010, the INC placed Issue 670 – *Remove Attaching Part 2 forms from CO Code request (Part 1)* into final closure.

The changes that have been made to the CO Code Part 1 form are contained in Appendix A of this change order proposal.

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4. The Proposed Solution

The National Pooling Administrator has determined that the amendments to the CO Code Part 1 form, as shown in the appendix, will require the following modifications to PAS.

Pooling Administration System Updates:

The Part 1/Part 1A screen, Part 1 screen, Code Disconnect Screen, and Part 1 form in PAS will all be modified to reflect the removal of the check boxes in section 1.8 of the CO Code Part 1, changes to the certification statement, and/or changes made to the footnotes.

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 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 changes to the CO Code Part 1 form will be \$

7. Conclusion

This change order proposal presents a viable solution that addresses the amendments to the CO Code Part 1 form and is consistent with the terms of our contract. We respectfully request that the FCC review and approve this change order.

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Appendix A

Resolution f	rom INC:			
The following	changes were	made to the CO Co	de Part 1 form:	
Tracking Number:				
Type of Application:	□New	 Change ⁱ	□Delete	
1.0 GENERAL INFORM 1.1 Contact Information:				
Code Applicant: Company/Entity Name: Headquarters Address: City, State, Zip: Contact Name: Contact Address:				
City, State, Zip: Phone: <u>Code Administratorⁱⁱ:</u>		Fax:	E-Mail:	
Name: Address: City, State, Zip: Phone:		Fax:		
1.2 NPA: Switching Identific	NXX ⁱⁱⁱ :		OCN ^{iv} :	Parent Company's OCN(s):
Locality/City/Wire		, Linuight 31, 1	Rate Center ^{vi} :	
Homing Tandem	Operating Co.vii:		Tandem Hon	ming CLLI ^{TM viii} :
1.3 <u>Dates:</u> Date of A	Application:		Requested E	Effective Date ^{ix x} :
can grant. Prequest will s	lease note that the still be processed ted Treatment pedite" = Yes	his only applies to a red in the order received.	duction in the Adm	arliest possible effective date the Administrator's processing time, however the
1.4 a). Type of compa	any/entity reques	sting the code:		(LEC, IC, CMRS, Other)
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Field Code Changed

vii Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

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viii This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of

ix Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

^x Requests for code assignment should shall not be made more than six months prior to the requested effective date.

xi Select if you are the current Code Holder

xii Select if you are <u>not</u> the current Code Holder

xiii The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

^{***}Applicant is not required to submit Part 2 of the code request form if it is doing its own TelcordiaTM. Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

^{***}WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut over for BIRRDS will not begin until input into BIRRDS has been completed.

^{****} Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

An incomplete form may result in delays in processing this request. [All footnote updates are for Issue 670]