

National Pooling Administration

Contract #CON07000005

Change Order Proposal #18

**(INC Issue 696: Clarify the Definition of “In Service” in the
Guidelines)**

November 9, 2010

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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

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

Industry Numbering Committee (INC) Issue 696, entitled *Clarify the Definition of “In Service” in the Guidelines*, addresses the state commissions’ concern that service providers may be misinterpreting the definition of *In Service*, and may therefore file a Part 4 even though a block (or code) is not actually in service. In addressing the issue, the INC modified the definition of *In Service*, and also made additional changes to the certification statement, note section, and footnotes on the CO Code and Thousands-Block Part 4 forms.

The INC issue statement is reproduced below.

INC Issue Statement:

States brought the following concern to INC: States are concerned that the INC Guidelines for code / block activation [In Service] are being interpreted to mean a single telephone number such that having one working telephone number constitutes activation. Codes or blocks which should in fact be either returned to the pool clean are being returned as contaminated and not being effectively utilized.

INC should review its definition of In Service to ensure that it is clear that administrative numbers do not constitute a Code/Block being In Service. And review the “Activation” language to ensure that it adequately distinguishes from In Service as related to Part 4 submission.

3. Industry Numbering Committee (INC) Resolution

On November 5, 2010, the INC placed Issue 696 – *Clarify the Definition of “In Service” in the Guidelines* -- into final closure, with the following statement:

The following edits were made to the definition of “In Service” in the CO Code Assignment Guidelines and the Thousands-Block Pooling Administration Guidelines:

In Service: A code or block for which local routing information ~~has been input to~~ appears in the LERG Routing Guide, and ~~the carrier has one or more telephone numbers within the NXX code or NXX-X block~~ has been Assigned to an end user ~~begun to activate and~~ Assign to end users ~~numbers within the NXX code or NXX-X block to end users~~ (FCC 00-104, ¶240). Numbers that are categorized as Administrative, Aging, Intermediate, Reserved, or Available cannot also be Assigned and do not satisfy the In Service requirement.

Attachments 1, 2 and 3 to this document contain the updated revised

- Central Office Code (NXX) Assignment Request - PART 4,
- Central Office Code (NXX) Assignment Request – Part 4-PA, and
- *Thousands-Block Number Pooling Administration Guidelines* (TBPAG) Thousands-Block (NXX-X) Confirmation Form Part 4.

4. The Proposed Solution

The applicable screens and forms in PAS will be updated to reflect several text changes and footnote edits (as reflected in the attachments) made to:

- the Central Office Code (NXX) Assignment Request - PART 4,
- the Central Office Code (NXX) Assignment Request – Part 4-PA, and
- the TBPAG Thousands-Block (NXX-X) Confirmation Form Part 4.

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 the system and not our day- to-day operations. However, the changes as a result of INC Issue 696 should be implemented in PAS at the same time they are implemented in NAS to avoid any customer confusion with regard to the various PART 4 forms they may see or receive from either of the two systems, as well as to ensure consistency in the overall administration of central office codes and thousands-blocks.

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 Guidelines is \$

7. Conclusion

This change order proposal presents a viable solution that addresses the amendments to the Part 4 forms, and is consistent with the terms of our contract. We respectfully request that the FCC review and approve this change order.

Attachment A
Central Office Code (NXX) Assignment Request - PART 4
Revised: February 9, 2004
Confirmation of Code In Service (Required)

By signing below, I certify that the CO code (NXX) specified below is In Service¹ (i.e., that one or more telephone numbers from the code are Assigned to end users) and that the CO code (NXX) is being used for the purpose specified in the original application.

Company Name: _____
 OCN: _____

 Authorized Representative of Code Applicant (Print) Signature

Telephone Number: _____
 Email: _____
 Fax Number: _____ Date: _____

1. NPA-NXX Code: _____ - _____ Rate Center: _____
2. Switch Identification (Switching Entity / POI)²: _____
3. Original Effective Date³: _____
4. In Service Date⁴: _____

Note: State commissions may request proof from all Code Holders that an NXX code has been activated and assignment of the numbers has commenced.⁵

¹ “In Service” is defined as follows: A code or block for which local routing information appears in the LERG Routing Guide, and one or more telephone numbers within the NXX code or NXX-X block has been Assigned to an end user (FCC 00-104, ¶240). Numbers that are categorized as Administrative, Aging, Intermediate, Reserved, or Available cannot also be Assigned, and do not satisfy the In Service Requirement.

² This is an 11-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI™) of the switch/POI shown on the Part 1 form.

³ This form must be submitted to the NANPA within 6 months of the original effective date returned on the Part 3 and entered on the ACD screen in BIRRDs or reclamation procedures will commence.

⁴ i.e., the date the code was placed In Service.

⁵ FCC 00-104 ¶ 237.

Attachment B

Central Office Code Assignment Guidelines (COAG)

Central Office Code (NXX) Assignment Request – Part 4-PA - ATIS-0300051.p4pa

Revised: July 19, 2010

Confirmation of Code In Service (Required) - Submitted by the Pooling Administrator

By signing below, I certify that the CO code (NXX) specified below, obtained to replenish the pool, is In Service. This is based on receipt of a Thousands-Block (NXX-X) Confirmation Form - Part 4 from an SP.

Code Holder: _____ OCN: _____

Authorized Representative of Pooling Administration (Print)

Signature

Telephone Number: _____

Email: _____

Fax Number: _____

Date:

1. NPA-NXX Code: _____ - _____ Rate Center: _____

2. Switch Identification (Switching Entity / POI)¹: _____

3. Original Effective Date²: _____

4. In Service Date³: _____

¹ This is an 11-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI™) of the switch/POI shown on the Part 1 form.

² This form must be submitted to the NANPA within 6 months of the original effective date returned on the Part 3 and entered on the ACD screen in BIRDS or reclamation procedures will commence.

³ i.e., the date the code was placed In Service.

Attachment C

Thousands-Block Number Pooling Administration Guidelines (TBPAG) Thousands-Block (NXX-X) Confirmation Form Part 4

Confirmation of NXX-X Block In Service (Required)

By signing below, I certify that the block (NXX-X) specified in Section 1 below is In Service¹ (i.e., that one or more telephone numbers from the block are activated and Assigned to end users) and is being used for the purpose specified in the original application.

Company Name:	
OCN:	

Print Name of Authorized Representative:			
Signature:		Date:	
Telephone Number:			
Email:			
Fax Number:			

1. NPA-NXX-X block: _____ Rate Center: _____
2. Switch Identification (Switching Entity / POI)²: _____
3. Original Effective Date³: _____
4. In Service Date⁴: _____

Note: State commissions may request proof from all block holders that an NXX-X block has been activated and assignment of the numbers has commenced.⁵

¹ “In Service” is defined as follows: A code or block for which local routing information appears in the LERG Routing Guide, and one or more telephone numbers within the NXX code or NXX-X block has been Assigned to an end user (FCC 00-104, ¶240). Numbers that are categorized as Administrative, Aging, Intermediate, Reserved, or Available cannot also be Assigned, and do not satisfy the In Service Requirement.

² This is an 11-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI™) of the switch/POI shown on the Part 1A form.

³ This form must be submitted to the PA within six months of the original effective date returned on the Part 3 and entered on the BCR/BCD screen in BIRRDs or reclamation procedures will commence.

⁴ i.e., the date the block was placed In Service.

⁵ FCC 00-104 ¶ 237