Permanent Routing Number Administrator
Change Order Proposal #19

January 27, 2011

Table of Contents

1. **Introduction**

1.1. **Purpose and Scope**

This change order proposal was prepared to provide a proposal for permanent pseudo-Automatic Number Identification (p-ANI) administration. At the direction of the FCC, the Pooling Administrator (PA) had previously assumed the functions of the Interim E-1-1 Routing Number Administrator (IRNA), as that term is defined in the *p-ANI Interim Assignment Guidelines for ESQK*.[1] In the context of the interim administration, the pooling administrator submitted a previous change order proposal to address the perceived immediate needs of the industry and to accommodate that FCC directive. This change order proposal is directed at the permanent p-ANI administration function. It is unlike any previously submitted change order, in that its scope is significantly greater: it encompasses the development and implementation of a completely new system and addresses the personnel issues relevant to the institution of a new number administrator-type. The assumptions contained herein relate not only to process clarifications, but also to issues not addressed in existing FCC Orders or the *P-ANI Administration Guidelines* developed by the Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC).[2]

In accordance with the terms of the national pooling contract,[3] the Pooling Administrator submits this change order proposal to the FCC for approval. Companion to this document, we will submit confidential and proprietary financial and system-related information to the FCC providing additional detail.

1.2. **Contractual Compliance**

The National Pooling Administration function is a contractual relationship between Neustar and the Federal Communications Commission. Any function performed by the PA beyond its contractual obligations and limitations must be approved by the FCC prior to commencement of that function.

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[1] Prepared by the North American Number Council (NANC) p-ANI Issues Management Group (p-ANI IMG), as revised December 5, 2005.

[2] ATIS- 0300089.

[3] *Contract for Pooling Administration Services for the Federal Communications Commission*, FCC Contract No. CON07000005.

2. Background

At this time, p-ANIs are administered in the United States in various specific geographic groupings. Two major carriers support p-ANI administration and provisioning in much of the nation. In those areas not supported by those two carriers, p-ANIs are administered in a variety of ways, by: a consortium of VPCs/MPCs; individual VPCs/MPCs, individual arrangements between carriers, individual governmental bodies, collections of governmental bodies, and use of dialable resources as p-ANIs. Some of these administering entities provide provisioning and routing services in addition to p-ANI administration. There is no central database providing a single repository for p-ANI–related information, nor is there a single process applicable nation-wide with which an entity must conform to receive p-ANIs. The FCC has indicated a desire to establish such a database and process. This change order proposal addresses those concerns.

It is intrinsic to both wireless and Voice over Internet Protocol (VoIP) technologies that their users can be nomadic. This movement creates issues regarding the ability of traveling users to access Public Safety Answering Points (PSAPs) in an emergency situation. Alliance for Telecommunications Industry Solutions (ATIS) committees have evaluated these issues and addressed them through the use of pseudo-ANIs[4] (p-ANIs) to establish access to the correct PSAP for a nomadic or roaming user with a foreign telephone number.
The term "pseudo-ANI" is defined in the Code of Federal Regulations at 47 CFR § 9.3 as:

> A number, consisting of the same number of digits as ANI, that is not a North American Numbering Plan telephone directory number and may be used in place of an ANI to convey special meaning. The special meaning assigned to the pseudo-ANI is determined by agreements, as necessary, between the system originating the call, intermediate systems handling and routing the call, and the destination system.

The permanent *P-ANI Administration Guidelines (Guidelines),* developed by the Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC),[5] define p-ANI in the glossary as a term:

> Used generically in this document to include any of the other more specifically descriptive acronyms associated with numbers used for routing emergency calls today, such as but not limited to: ESRD, ESRK, ESQK, PSAP routing numbers, etc.

For over 10 years, the FCC has required wireless service providers to supply some level of enhanced 9-1-1 (E9-1-1) service capabilities to their customers. See 47 C.F.R. § 20.18(d), which reads as follows:

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4 ANI is the acronym for *automatic number identification*, a service that provides the telephone number of an incoming call. ANI is used for a variety of functions including helping to identify the caller's address to speed response time to 911 calls.

5 ATIS- 0300089.

> Phase I enhanced 911 services. (1) As of April 1, 1998, or
> within six months of a request by the designated Public Safety Answering
> Point as set forth in paragraph (j) of this section, whichever is later, licensees
> subject to this section must provide the telephone number of the originator of a
> 911 call and the location of the cell site or base station receiving a 911 call
> from any mobile handset accessing their systems to the designated Public
> Safety Answering Point through the use of ANI and Pseudo-ANI.

To facilitate that mandate, certain ILECs provide p-ANIs to entities that request them, generally out of the various NPA-511 NXXs. Wireless service providers that are unable to obtain non-dialable p-ANIs must use their own dialable numbers as p-ANIs.

On June 3, 2005 the FCC issued the *First Report and Order*, FCC Docket 05-196, requiring VoIP providers to supply enhanced 9-1-1 (E9-1-1) service capabilities to their customers.[6] In Paragraph 1 of that Order, the FCC stated as follows:

> [W]e require providers of interconnected VoIP service to provide E911
> services to all of their customers as a standard feature of the service, rather
> than as an optional enhancement. We further require them to provide E911
> from wherever the customer is using the service, whether at home or away
> from home.

VoIP providers needed p-ANIs to comply with this directive, and began seeking them, either from the NPA-211 NXXs or as dialable numbers obtained from other carriers out of their respective TN inventories. Certain VoIP Positioning Centers (VPCs) also independently provided, and continue to provide, a mechanism to comply with the FCC Order through administration of p-ANIs to supplement those provided by the pertinent LECs.

In late 2005,

- The ATIS Emergency Service Interconnection Forum (ESIF) asked the industry and the North American Numbering Council (NANC) to provide comments on its "*Routing Number Authority (RNA) for p-ANIs Used for Routing Emergency Calls – p-ANI Assignment Guidelines and Procedures.*"[7]
- The NANC Future of Numbering Working Group established the E9-1-1 p-ANI Issue Management Group (IMG) to address the request by ESIF and to provide a recommendation to the NANC.
- The NANC IMG sent to the NANC for approval guidelines for the Interim Routing Number Administrator to use in the issuance of Emergency Service Query Keys

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[6] FCC *First Report and Order and Notice of Proposed Rulemaking in its proceeding regarding the regulation of internet protocol (IP) enabled services* (FCC 05-116).
7 © 2005 by Alliance for Telecommunications Industry Solutions, created by the Emergency Services Interconnection Forum (ESIF).

(ESQKs)[8] in those areas of the country where no other entity is assigning them. The NANC approved the Interim Guidelines.

By letter dated September 6, 2006, the FCC Wireline Competition Bureau, through then-Director Thomas Navin, (1) appointed the Pooling Administrator as the Interim Routing Number Administrator (IRNA), and (2) clarified the Interim Guidelines. The letter directed that, as clarified, the Interim Guidelines would apply to the IRNA and any entities that would seek to obtain numbers from the IRNA until such time as guidelines for the permanent RNA could be developed and published, and the FCC could appoint a permanent E9-1-1 administrator.

In late 2006, the ATIS Industry Numbering Committee (INC) began working on the guidelines under which the permanent RNA would operate. INC continues to accept contributions for the *P-ANI Administration Guidelines*, ATIS – 0300089, which remain in Initial Pending status.

The national pooling administration contract awarded to Neustar effective August 14, 2007, contained language identifying the Pooling Administrator as the future permanent RNA:

> The contractor shall serve as the interim RNA until such time as a permanent p-ANI solution is in place. At that time, the interim RNA will become the permanent RNA and will perform the p-ANI administration function in accordance with permanent guidelines adopted by the NANC and approved by the Commission.

On December 14, 2010,[9] the FCC clarified two issues related to the permanent guidelines, and directed the Pooling Administrator to file a change order proposal for a permanent p-ANI solution.

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[8] For an E9-1-1 call, ESQKs allow the designated response center to provide the VoIP caller's location to the responders.

[9] Letter from Sharon E. Gillette, Chief, Wireline Competition Bureau, to NANC Chair Betty Ann Kane and the Director of Number Pooling Services, Amy L. Putnam.

3. Significant Requirements Defining the Scope of P-ANI Administration

The *P-ANI Administration Guidelines* (*Guidelines*) outline the duties of the RNA at Section 5.0 *et seq.* Section 5.0, *RNA Responsibilities*, describes the high level responsibilities of the RNA as:

- General Administration Duties
- Forecasting and Planning Processes
- Assignment Processes
- Reporting Processes
- Reclamation Processes
- Audits
- P-ANI Relief Planning.

Subsequent sections of the *Guidelines* delineate RNA responsibilities in more detail. The RNA is directed to:

1) Assign p-ANIs only to eligible users;
2) Be responsible for maintaining p-ANI inventory;
3) Assure the availability of resources within a given NPA, based upon industry established criteria;
4) Add to the resources in the p-ANI inventory when necessary;
5) Update the RNA system to reflect any changes resulting from NPA relief activity;
6) Provide extensive report capability;
7) Make available to the PSAP community individual p-ANI assignments for emergency purposes such as troubleshooting upon request;
8) Notify the INC when the projected exhaust of the 211/511 resources within an NPA is within 1 year; and
9) Build and maintain an industry database which includes appropriate security for confidential data, and which will:
   a) receive all applications for p-ANIs from applicants, validate the OCN and NENA Company ID, and check each field for completeness;
   b) verify that the applicant has completed the Part 1 form;
   c) log and track all applications using a tracking mechanism which will enable the RNA and the applicants to identify a specific p-ANI request;
   d) track assignments and perform other operational functions (*e.g.*, p-ANI reclamation);
   e) compile the demand forecasts submitted by the eligible users and generate a total forecast for the p-ANI inventory; and
   f) develop, populate, and provide a database that is accessible through an

appropriate mechanism and which, at a minimum, includes the following information:

1. all p-ANIs in the p-ANI inventory (i.e., NPA-NXX-XXXX range information displayed);
2. status of the p-ANIs (i.e., assigned, available, aging);
3. identification of the p-ANI assignee to which the p-ANI or the p-ANI range has been assigned; and
4. RNA System user profile(s) that contain the user's contact information, OCN, NENA Company ID and level of access permitted. A user may need multiple individual profiles and passwords.

4. Neustar's Proposed Solution

The Pooling Administrator proposes the process and system discussed below to address the national administration of p-ANIs as directed by the *Guidelines.* It is consistent with Neustar's constant effort to provide the best support and value to both the FCC and the telecommunications industry in numbering administration. We will provide a state-of-the-art system, access to that system through a secure website, and appropriate staffing to perform all the functions identified in the *Guidelines*. We will perform the daily tasks attendant to the processing of applications, including troubleshooting, enabling regulators, industry members, and members of the emergency service community to understand and use the system, addressing requests, and reviewing documentation. We will be able to provide all reports identified in the *Guidelines*. For our customer support, we will have a toll-free customer support line and email to support the needs of the stakeholders.

We will also monitor and adapt to the changes that occur in the industry itself through attendance at and participation in the Emergency Services Interconnection Forum (ESIF) process. Such participation will enable us to recognize when relevant issues are raised that should be addressed at other industry forums, such as the Industry Numbering Committee (INC), and know what their impact will be when changes are integrated into the *Guidelines*.

To establish the database, we will populate it with the current information from existing recipients, cross-referenced with information obtained from existing administrators. If inconsistent information is provided, we will err on the side of caution, and protect those numbers from assignment until we have determined what the correct information is. The initial information in our database will be as accurate and complete as the sources provide, and will be updated over time as we research and resolve any discrepancies.

Information about the RNA will be included in any of the Pooling Administrator's Contract Data Requirements List (CDRL) that are pertinent, as well as the monthly progress report to the Contracting Officer and the Contracting Officer's Technical Representative. The RNA will submit separate monthly system performance reports and monthly assignments reports.

4.1. Web Access

Neustar will provide a website, www.nationalpani.com, which will be separate from, but similar to, the pooling website. It will contain the gateway to the Routing Number Administration System (RNAS). Users can use the gateway to register to access, as well as log in to, the RNAS. It will conform to the *Guidelines'* requirements, and also include: a user-friendly guide to assist users in navigating the RNAS, a conflict resolution process, industry-related website links, and our customer support contact information. When this website goes live, the website presently being used to access information relating to the Interim RNA, www.esqk.com, will be transitioned and terminated.

4.2. **System**

In a manner similar to the existing pooling administration processes, the RNA must allocate p-ANIs to all eligible users in a fair and neutral manner consistent with all the requirements of the *Guidelines*. As with the PAS, much of the function of such administration will be automated in the RNAS. Much time and effort has been expended in developing an extensive requirements document for the system, which has been modified, as necessary, as the INC refines the *Guidelines*.

The following entities may register for access to the RNAS: FCC, state commission, 9-1-1 governing authority, Public Safety Answering Point (PSAP), 911 system service provider, and eligible user. To access the RNAS, each user will have to complete the registration process. To populate the RNAS, eligible users will be required to submit their initial reports via an Excel file in the format that the RNA will provide, as discussed in Section 3.3. Thereafter, the system will permit an eligible user to apply for p-ANIs through a secure web site that contains all fields contained on the INC p-ANI Part 1 form. To the extent that the information is available, the RNA will use the PSAP ID in the FCC Master PSAP Registry File on the FCC website to pre-populate the PSAP name, state, and county or municipality into Section 1.2 of the ATIS INC Part 1 form in the RNAS.

P-ANI assignments must be made within 5 business days of receipt of a complete and valid request. Once the assignment is made, the applicants will receive a Part 3 response, just as they do from the PAS. A password-protected query for individual p-ANIs, and password-protected reports relating to forecast, Part 1, Part 3, Annual Report and p-ANI assignment data will be made available to the various registered external users of the RNAS; however, those users' access to that data will be limited to their specific user role within the RNAS.

The architecture of the RNAS will be similar to that of the PAS, and, like the PAS, it will be transferable, and will meet the Pooling Administration contract requirement of 99.9% uptime. The RNAS will be protected by all security and intrusion detection systems that currently protect the PAS. Further confidential and proprietary information describing the system is contained in the companion document filed with the FCC.

Development of the system software will be consistent with current methodologies, and will therefore include periods relating to each of the following processes: system functional requirements development, high level system design, system development, system/integration testing, system acceptance testing, and system implementation. Further detailed information related to system software development and system architecture is subject to security concerns, and is confidential and proprietary to Neustar. It will be provided to the FCC under separate cover.

The RNAS will go live nine months after the contract modification approving this change order is received from the FCC.

4.3. **Initial Data Population of the System**

Building and populating the industry database will be a complex project. Neustar has experience building highly successful, reliable databases, including those for the administration of local number portability, central office codes, and pooled blocks. For each of those functions, the data

populating the database was either being newly created, or had been under the control of Neustar for a period prior to its integration into the system. Here, however, the data which will initially populate the database will be received from a multitude of outside sources, and must be analyzed and cross-referenced to assure the level of accuracy that is consistent with Neustar's previous performance, and that Neustar deems necessary to provide a service as vital as one associated with emergency response.

The RNAS will be populated with data received from various sources encompassing the universe of p-ANI assignors and the universe of p-ANI users. The two sets of data will be cross-referenced before any assignments are made, to assure that no number is made available for assignment if either an assignor or a user believes that it is in use.

Any entity (including wireless, VoIP Positioning Center (VPC), Mobile Positioning Center (MPC), or interconnected VoIP provider) that is using any non-dialable p-ANI (whether self-assigned or assigned by another entity) will be required to file an Initial Report containing:

> (1) the information required in the p-ANI Guidelines for the Annual Report,
>
> (2) the FCC PSAP ID and PSAP information for each p-ANI or range of p-ANIs,
>
> (3) the selective router CLLI information for each p-ANI or range of p-ANIs,[10] and
>
> (3) the 24x7 emergency company contact number.

This Initial Report, a template for which is attached hereto in Appendix A, will fulfill the Annual Report requirement for the current reporting period.

Each current administrator, including governmental administrators, will be required to provide a list of all p-ANI assignments that it has made using a standard format similar to the data collected in the Initial Report. See Appendix B. The Interim RNA will treat itself as a current administrator, and provide its initial list of p-ANI assignments to be incorporated into the new system data at this phase.

The use of standardized reports will enable the automation of the data load. The RNA will load the information obtained from these reports and initially characterize all numbers as *Assigned*, *Pending, Under Investigation*, *Unavailable*, or *Available*, depending on the content of the reports.

- *Pending* is defined as: any p-ANI or p-ANI range that was reported by only one assignee where at least one of the following fields is left blank or is invalid: In Use, FCC PSAP ID, PSAP name, PSAP state, county/municipality, 24X7 Emergency Contact Number, or Selective Router CLLI.

- *Under Investigation* is defined as: any p-ANI or p-ANI range where more than one assignee reported on the same p-ANI.

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[10] Letter from Jim Goerke, ATIS ESFI Chari, to Florence Weber, dated January 20, 2011.

- *Unavailable* is defined as: any p-ANI or p-ANI range which was reported only by the existing administrator (p-ANI assignor) as being assigned.

After the initial reports have been provided, all entities will submit a second report of all activity that occurs between the first report and the week in which no assignments are made (See Assumption #9). That week will immediately precede the RNAS go-live date.

The RNA will begin assigning only from the numbers identified as *Available*, but will undertake an investigation of conflicting data to resolve the status of numbers initially identified as *Pending, Under Investigation*, or *Unavailable*. Upon resolution of their status, those numbers will be moved to the *Assigned* or *Available* category, as appropriate.

4.4. Staff and Administration

Florence Weber, Regional Director, p-ANI administration (RD/p-ANI), will manage the RNA activities, which will include:

- developing the requirements document for the system,
- working with systems engineering on code development issues,
- overseeing the testing process, including testing and assisting the system quality assurance testers,
- overseeing the initial p-ANI data load process, in conjunction with system engineering and the Regional Director for Data Quality,
- developing Methods & Procedures documentation as necessary,
- developing the User Guides,
- supervising the p-ANI administrator, and
- assuring that p-ANIs are administered in compliance with the *Guidelines*.

The RD/p-ANI will report to, and work closely with, the Director of Pooling Administration (Director).

In addition to the dedicated RD/p-ANI, a dedicated p-ANI administrator will be required. That position will be located in the Concord, CA office. Both the RNA Regional Director and the p-ANI administrator will process applications. Other functions (such as data quality assurance, compliance, regulatory interface, industry interface) will be assumed by the person or team performing those functions for National Pooling Administration.

As the Interim RNA, Neustar participated in the development of the permanent *Guidelines.* In anticipation of permanent status, we have been working with ESIF on any issues related to p-ANI.[11] The Director, the RD/p-ANI, and the Industry Interface Representative will continue to interact with ESIF and the Industry Numbering Committee (INC) on any further amendments to the permanent *Guidelines*.

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[11] The Director is presently serving a second term as co-chair of the ESIF ECDR subcommittee.

4.5   **Training**

Upon initial roll-out of the RNAS, we will provide training for both the public and secure portions of the www.nationalpani.com website. We will also post videos from that initial training to our website so that users may view them at their convenience. As with Pooling Administration, additional training will be provided as needed.

5. Assumptions and Risks

Part of the PA's assessment of this change order is to identify the assumptions associated with this change order proposal, and consider the attendant risks that can have an impact on our operations.

5.1. Assumptions

This Change Order proposal is based upon the following policy and process assumptions:

1. When the FCC accepts this change order, it will issue an order, or will in some way imbue the RNA with the authority to require any entity that has <u>received</u> non-dialable p-ANIs from an existing administrator, or from another carrier, through self-assignment, or in any other fashion, to advise us of each and every non-dialable p-ANI it has received, the selective router CLLI information for each p-ANI or p-ANI range, and whether each non-dialable p-ANI is in use.[2] The data in the report will be used to populate the RNAS. The report will be in a uniform format provided by the RNA. This report template will be made available on the RNA website, and will be sent to ATIS, CTIA, NENA, and APCO, for them to disseminate to their members, and will be sent to the PA distribution list and the NANPA distribution list. Each potential eligible user that has already received p-ANIs shall file this initial report (see Section 4.3, above, and Appendix A) prior to the go-live date, but no later than the deadline which will be provided in the notification from the RNA.

2. When the FCC accepts this change order, it will issue an order, or will in some way imbue the Routing Number Administrator (RNA) with the authority to require any entity that has <u>assigned</u> non-dialable p-ANIs to advise us of each and every non-dialable p-ANI it has assigned prior to the go-live date, but no later than the deadline which will be provided in the notification from the RNA. (see Section 4.3, above, and Appendix B). The data in the report will be used to populate the RNAS. The report will be in a uniform format provided by the RNA. This report template will be made available on the RNA website, and will be sent to ATIS, CTIA, NENA, and APCO, for them to disseminate to their members, and will be sent to the PA distribution list and the NANPA distribution list.

3. When the FCC accepts this change order, it will issue an order, or will in some way imbue the RNA with the authority to require each existing administrator to provide the RNA with a list of the 9-1-1 governing authorities with which it interacts.

4. The RNA will populate its database at the p-ANI range level using the data contained in the assignees' initial report as the benchmark data. We will cross-reference that data with the assignors' information. Any number that appears in only one set of data will be restricted from assignment until we have researched it. The quality of the RNAS content is

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[2] An *in-use p-ANI* is defined in the P-ANI Administration Guidelines as: "A p-ANI that has been provisioned in the serving E9-1-1 network and is being used for emergency communications purposes with the appropriate PSAP."

dependent on the accuracy of the data provided by each reporting entity via its initial report.

5. After the RNA assumes responsibility for assigning p–ANIs, no other entity presently administering p-ANIs will continue to perform that function, and any p-ANIs in the NPA-211 and NPA-511 codes that are not reported as assigned on any initial report will be considered available by the RNA for placement in its inventory of available p-ANIs to assign from.

6. VPCs and MPCs that have allocated non-dialable numbers to themselves for use as p-ANIs in the E9-1-1 system will retain those p-ANIs that are actually in use in the E9-1-1 system at the time the RNA assumes responsibility for assigning p-ANIs. Any non-dialable numbers not in use at that time will be reported as available, and considered available by the RNA for placement in its inventory of available p-ANIs to assign from.

7. The RNA will not store in its database the *dialable* p-ANIs that are presently being used, or may at some time have been used as a p-ANI, since anecdotal information indicates that there is little or no centralized information, even in SPs' databases, that will yield accurate data on this subject.

8. Upon approval of the change order proposal by the FCC, the RNA will notify all affected parties of the critical dates on the timeline for transition to the permanent RNA.

9. At the time of the final cutover to the permanent RNAS, there will be one week of no activity, during which no administrator will assign any p-ANIs.

10. P-ANI users or entities intending to apply for p-ANIs will also file an initial forecast in the RNAS during the first 30 days after the RNAS goes on line, so that the RNA can promptly assess what the forecasted demand might be during the first year of implementation. This forecast will be able to be modified, as necessary. It will also enable the RNA to make a first assessment as to the possible exhaust dates of the 211 and 511 NXXs.

11. The RNA function will be limited to that set forth in the INC *p-ANI Administration Guidelines*, as clarified by the FCC and this change order proposal.

12. The RNA will initially assign non-dialable p-ANIs exclusively out of the 211 and 511 NXXs. There is no technological or other distinction between the two NPA-NXXs, which will be interchangeably assigned to wireless and VoIP providers.

13. Each NPA will be treated as a separate pool of p-ANIs.

14. The RNA will use the publically available Company ID List on the NENA website (*http://nena.org/companyid/cid.asp*) to validate Eligible User NENA IDs in the RNAS.

15. The RNA will use the OCN information resident in the PAS to validate Eligible User OCNs in the RNAS.

16. The Red Light Rule will be applied to p-ANI administration in the same manner that it is applied to pooling administration. The RNA will use the red light information resident in the PAS to validate p-ANI applications in the RNAS.

17. To the extent possible, the RNA will use the FCC Master PSAP Registry File on the FCC website (*http://www.fcc.gov/pshs/services/911-services/enhanced911/psapregistry.html*) to

obtain the list of FCC PSAP IDs to pre-populate some PSAP-related fields in section 1.2 of the ATIS INC Part 1 form in the RNAS.

18. The RNAS will support FTP to accommodate mass modification requests.

19. The RNA will purchase the NENA PSAP contact list annually and will notify PSAPs by either email, or regular mail when no email address is provided, (1) when we go live, (2) every time we open a new NXX, and (3) whenever a new NPA is implemented. When a new NPA is implemented, we will notify only the PSAPs that service the existing and new NPAs.

20. The relationship between the selective router CLLI information and the p-ANI is considered confidential for each assignee, and therefore will not reside on the public web site, but will be maintained on a password-protected site.

21. As used in the *p-ANI Administration Guidelines*, the term "appropriate governmental agency" references the same universe of jurisdictions (states, District of Columbia, Puerto Rico, and the FCC) that presently handle issues relating to pooling. The determination of whether the FCC is the appropriate governmental agency, or whether some state agency is the appropriate governmental agency for purposes of reports, requests for extensions, reclamation, abandoned p-ANIs, and appeals of complaint resolution will therefore conform to the practice in Thousands-block Pooling Administration.[12] Regulatory users will have access to Eligible User confidential and proprietary information at a level comparable to what they have in the PAS, *i.e.*, information that is specific to that regulator's state or jurisdiction.

22. If the RNA feels that an application for resources raises policy issues, the RNA will escalate the question to the appropriate governmental agency, and that escalation will toll the processing period until the appropriate governmental agency advises the RNA on the correct course of action.

23. Section 2.7 of the *Guidelines* advises that:

    A p-ANI Applicant requesting resources from the p-ANI inventory:

    a) shall provide, as part of its application for p-ANIs, evidence demonstrating that the p-ANI Applicant is an Eligible User of p-ANI resources. An Eligible User is defined as an entity that:

    1) Demonstrates that it is permitted under applicable law to access p-ANI resources in the area for which the p-ANI resources are sought…

    Therefore, for each application:

    - A wireless service provider applicant can satisfy Section 2.7(a)(1) by providing the RNA with its FCC license showing that it is entitled to provide service in the area in which it is seeking resources.

    - An interconnected VoIP service provider applicant can satisfy Section 2.7(a)(1) by providing the RNA with pages 2 and 36 of FCC Form 477

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12 *Ibid*, page 3.

showing that it is entitled to provide service in the area in which it is seeking resources.

- Any entity that requires p-ANIs to comply with any state or federal order and that has been certified as a CLEC by a state can satisfy Section 2.7(a)(1) by providing the RNA with its state certification showing that it is permitted to provide service in the area in which it is seeking resources.[13]

24. Carriers that will be exchanging dialable p-ANIs for non-dialable p-ANIs already have established with either the PA or the NANPA that they are certified to do business in the area in which they are using the dialable numbers. Therefore, when they seek solely to exchange the dialables for non-dialables, the RNA will not require documentation that establishes their entitlement to do business in that area. However, in order to satisfy any potential audit requirements, they will be required to indicate in the remarks field of their application which dialable numbers they are replacing with the non-dialables that are the subject of that application.

25. Because the determination of what constitutes a 9-1-1 governing authority is a matter of state law, and varies from state to state, the requirement that each applicant must have approval from the 9-1-1 Governing Authority to be considered an Eligible User[14] will be a matter of self-certification. However, the applicant will have to identify on their application from which 9-1-1 Governing Authority it has received such authorization.

26. Certain information addressed in the *Guidelines* is a matter of self-certification on the part of the applicant, and will not be validated by the RNA:

   a. Whether the number of p-ANIs applied for falls within the range of any ESIF formula, or whether any formula applies to that particular application;

   b. Whether the supporting documentation from the p-ANI applicant documents the applicant's need for the specific quantity of p-ANIs requested;

   c. Whether the p-ANI applicant has the technical and functional capability to route traffic or provide routing instructions to enable emergency call delivery to a PSAP;

   d. Whether p-ANIs are in use as reported in the Eligible Users' annual reports.

5.2. **Risks**

The proposed solution does not present any additional risks to the internal operations of the national pooling administrator.

The system proposed here does not pose any risk to the PAS.

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13   See *Implementation of the NET 911 Improvement Act of 2008,* FCC 08-2009, at Footnote 66: citing 47 CFR § 52.15(g)(2)(i), and indicating, without prejudice to any pending petitions, that VPC providers that are neither carriers nor interconnected VoIP providers may not obtain numbering resources.

14 See Letter from Sharon E. Gillette, Chief, Wireline Competition Bureau, to NANC Chair Betty Ann Kane and the Director of Number Pooling, Services Amy L. Putnam, dated December 14, 2010, at footnote 7.

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6. Cost

Under the parameters and assumptions identified above, the cost to implement our proposed solution is xxx. This fixed-price figure will be divided by the number of months remaining in the Pooling Administration contract after the PA receives the relevant contract modification from the FCC; this amount will be added as a pro-rated monthly cost line item to the monthly invoices submitted by the PA. Additional detailed confidential and proprietary cost information will be provided to the FCC under separate cover.

7. Conclusion

In conclusion, the national Pooling Administrator has offered a viable solution that addresses the immediate necessity for a permanent RNA Administrator, and we ask that the FCC review and approve this change order proposal.

APPENDIX A – Receivers of p-ANI Assignments

	Initial Report										
Company Name											
NENA ID #1											
OCN											
Contact Name											
Phone #											
Fax #											
E-mail											
4X7 Emergency Company Contact Number											
Data as of (MM/DD/YYYY)											

NPA	NXX	p-ANI Range XXXX		Selective Router CLLI	FCC PSAP ID	PSAP Name	PSAP State	PSAP County or Municipality	In Use (Y/N)	Remarks	24X7 Emergency Company Contact Number
		Low	High								

24X7 Emergency Company Contact Number = If you have one contact number, provide it in row 11. If you have multiple contact numbers, provide that number with each reported p-ANI range under column K.

NPA = Enter the NPA of the non-dialable p-ANI you are reporting on.

NXX = Enter the prefix of the non-dialable p-ANI you are reporting on, either 211 or 511.

Low = Enter the p-ANI starting number of "XXXX", if you are reporting on just one p-ANI enter it in both the Low and High fields.

High = Enter the p-ANI ending number of "XXXX".

FCC PSAP ID = The PSAP ID may be obtained from the FCC's Master PSAP Registry File located at http://www.fcc.gov/pshs/services/911-services/enhanced911/psapregistry.html

PSAP Name, PSAP State and PSAP County or Municipality = If no FCC PSAP ID exists, then provide the PSAP Name, PSAP State abbreviation and PSAP County or Municipality.

In Use (Y/N) = If the p-ANI range is "In Use", enter "Y". If the p-ANI range is not in use, enter "N" and provide an explanation on why it is not in use in the Remarks field.

Remarks = If there any comments specific to that p-ANI range, include it.

APPENDIX B – Assignors of p-ANI

p-ANI Assignment Data									
Company Name									
Contact Name									
Phone #									
E-mail									
Data as of (MM/DD/YYYY):									

		p-ANI Range XXXX					PSAP	PSAP County or	
NPA	**NXX**	**Low**	**High**	**Service Provider**	**Selective Router CLLI**	**PSAP Name**	**State**	**Municipality**	**Remarks**

NPA = Enter the NPA of the non-dialable p-ANI you are reporting on.

NXX = Enter the prefix of the non-dialable p-ANI you are reporting on, either 211 or 511.

Low = Enter the p-ANI starting number of "XXXX", if you are reporting on just one p-ANI enter it in both the Low and High fields.

High = Enter the p-ANI ending number of "XXXX".

If available, enter the PSAP Name, PSAP State and PSAP County or Municipality.

Remarks = If there any comments specific to that p-ANI range, include it.