



National Pooling Administration

Contract #CON07000005

Revised Change Order Proposal #21

(INC Issue #710– NANC Action Item “multi-OCN Issue”)

November 11, 2011

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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

Because of mergers and acquisitions, some service providers (SPs) have available to them, and use, more than one OCN in a state when they apply for numbering resources. The issue statement for INC Issue 710 - *NANC Action Item “multi-OCN Issue”* indicated that the INC would work with the Pennsylvania PUC to develop a solution that would help state commission staffers to identify related OCNs. In its final resolution of the issue, the INC modified the PA Part 3 form to include the Parent Company OCN and added language in the guidelines so that regulators inform NANPA and the PA when a carrier’s license has been revoked. The Pooling Administration System (PAS) will need to be updated to accommodate the change to the Part 3 form as well as the reports that the SPs and regulators review and receive.

The INC issue statement is reproduced below.

INC Issue Statement:

At the December 16, 2010 NANC meeting, PA PUC staff requested that the NANC address the “multi-OCN issue” within states. The INC received an Action Item at that meeting to work with the PA PUC staff on the issue. The INC Chair and Vice Chair met with the PA PUC staff.

Some SPs operate under multiple OCNs and Company Names within a state for a variety of reasons, e.g., mergers and acquisitions. At times, it can be difficult for a state staffer to identify the SP requesting growth resources and to identify if a SP is utilizing more than one OCN per Rate Center.

3 Industry Numbering Committee (INC) Resolution

On July 29, 2011, the INC placed Issue 710 – NANC Action Item “multi-OCN Issue” into final closure. The resolution of Issue 710 contains the following language:

Resolution from INC:

To assist state commission staff with identifying the relationships of multiple OCNs in a given state, INC added the parent company OCN field to the COCAG and TBPAG Part 3s (see attached).



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CO-Code-Assign-Req
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NANPA shall add the parent company OCN from the Part 1 application and parent company OCN name to its Part 1 and Part 3 reports provided to the states. The PA shall add the parent company OCN from the Part 1a application and parent company OCN name to its Part 1a and Part 3 reports provided to the states. It is understood that this course of action will produce NANPA and PA change orders.

The following edits were made to the TBPAG and COCAG:

TBPAG:

2.7 When a service provider's jurisdictional certification or license to operate has been revoked, the appropriate regulatory authority should provide written direction and supporting documentation to the PA to deny applications for the company name associated with the revoked jurisdictional certification or license.

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5.3 Assignment Processes

The PA shall:

- a) Using the Pooling Administration System (PAS), receive all applications for thousands-blocks from SPs and validate each field as data is entered to ensure each applicant meets the criteria to be a Block Holder;
- b) Verify that the applicant has completed the appropriate forms containing all of the pertinent information such as OCN (Operating Company Number), parent company OCN, switch ID, and Block Effective Date;
- b)c) Deny the application if the PA has received written direction and supporting documentation from the appropriate regulatory authority to do so, due to jurisdictional certification or licensing revocation.

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COCAG:

3.0 Assignment Principles

The following assignment principles apply to all aspects of the CO Code (NXX) Guidelines:

- 3.1 CO codes (NXXs) are assigned to entities for use at a Switching Entity or Point of Interconnection they own or control. 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 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 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 Code Holder of a pooled NXX 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.

- 3.2 Central office codes (NXX) are a finite resource that should be used in the most effective and efficient manner possible. All applicants will be required to provide a completed Part 1 form and, for additional codes, quantitative support to demonstrate compliance with these guidelines. The quantitative information required for an additional code request is the “CO Code Assignment Months to Exhaust Certification Worksheet - TN Level” (Appendix B) or “Thousands-Block Number Pooling Months To Exhaust Certification Worksheet – 1000-Block Level” [Thousands-Block Number (NXX-X) Pooling Administration Guidelines, Appendix 4]. The applicant should retain a copy in the event of an audit or regulatory initiative (See Section 4.2.1).
- 3.3 Information that is submitted by applicants in support of code assignment shall be kept to a minimum, be uniform for all applicants, and be treated as proprietary and adequately safeguarded by the PA/NANPA. Switch CLLI information shall not be placed on the NANPA website but shall be retained by the PA/NANPA. The Switch CLLI information will continue to be available to those Service Providers and appropriate state and governmental regulatory authorities who have registered for access to the PA/NANPA secured systems. If an appropriate state and governmental regulatory authority has not registered for access to the PA/NANPA secured systems, this information shall be made available upon request. Information required by Telcordia® Business Integrated Rating and Routing Database System (BIRRDs), Telcordia® TPM™ Data

Source², and information available in the LERG Routing Guide may be subject to licensing agreements with Telcordia®.

- 3.4 Central office codes shall be assigned in a fair and impartial manner to any applicant that meets the criteria for assignment as detailed in Section 4.0.
- 3.5 Applicants for central office codes must comply with all applicable local governmental, state, federal and the NANP area governmental regulations relative to the services they wish to provide.

3.6 When a service provider's jurisdictional certification or license to operate has been revoked, the appropriate regulatory authority should provide written direction and supporting documentation to the NANPA to deny applications for the company name associated with the revoked jurisdictional certification or license.

3.67 Any entity that is denied the assignment of one or more central office codes under these guidelines has the right to appeal that decision per Section 13.

3.78 Affected parties³ in a given geographic area have the right and will be given the opportunity to participate as early as possible in the process of determining the alternatives for addressing CO code (NXX) exhaust and relief in that area before the CO Code Administrator(s) submits a final recommendation to the relevant regulatory body.

3.89 Resource conservation, in and of itself, should not inhibit or otherwise impede, the ability to obtain NXXs.

3.93.10 SPs cannot change the rate center on a code that contains ported TNs. Such changes are not permitted because of the impact to customer calling patterns and associated charges.

3.403.11 If an SP has chosen to participate in thousands-block number pooling in a voluntary rate center outside of the top 100 MSAs, the SP cannot withdraw from pooling in a voluntary rate center once the SP has submitted a forecast, a donation, or has been assigned a thousands-block. Once an SP chooses to participate in thousands-block number pooling in a voluntary rate center, all numbering requests must be submitted directly to the PA.

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5.0 CO Code (NXX) Assignment Functions

The CO Code Administrator(s) shall:

² TPM Data Source is a trademark of Telcordia Technologies, Inc.

³ Affected parties are a) those entities that have applied for and/or received central office code (NXX) assignments or reservations within the affected NPA per Section 4.0 of these Guidelines; b) all interested members of the industry within the affected NPA.

- 5.1 Produce and make available upon request information regarding NANPA CO Code Administration processes, guidelines, interfaces and services. Provide upon request of the code applicant information on how to obtain documents related to CO Code Administration by either referring them to web sites where it will be possible to download electronic copies or provide paper copies if the requester cannot obtain the document via the Internet.
- 5.2 Receive and process applications (CO Code (NXX) Assignment Request Form Part 1) for CO codes (NXX) within the geographic NPA(s) for which the CO Code Administrator is responsible.

For rate centers transitioning to pooling:

- The CO Code Administrator will only process NXX requests received at least 33 calendar days prior to the Pool Start Date.
- Within the 33 calendar days prior to Pool Start Date, applications for codes/blocks will not be accepted. However within this 33-day interval, the NANPA will continue to process code applications for:
 - CO codes awarded via lottery;
 - LRN requests;
 - full CO code request for a single customer;
 - CO code expedite requests;
 - petition/safety valve requests;
 - any requests from non-pooling capable carriers; and
 - PA requests to the NANPA.

After Pool Start Date, all pooling-capable carriers will apply to the PA for numbering resources.

Once an SP chooses to participate in thousands-block number pooling in a voluntary rate center, all numbering requests must be submitted directly to the PA. NANPA will not assign a CO code (NXX) to an SP for a voluntary pooled rate center in which that SP has either submitted a forecast to the PA, submitted a donation to the PA, or has been assigned a thousands-block in that rate center.

- 5.2.2 Receive NXX Code application from SPs and validate the entire application to determine if the request is in compliance with code assignment policies and guidelines. If one or more errors are identified, the Code Administrator will notify the applicant with a list of all errors on the application. Upon notification, the application is suspended and the applicant has up to two business days to respond with the corrections back to the Code Administrator. If the application is returned within the two business days with all errors corrected, the Code Administrator will lift the suspension and proceed with the assignment process. If the errors identified by the Code Administrator are not corrected by the applicant within two business days, the Code Administrator will issue a Part 3 denial. The NANPA is required to withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements.⁴

⁴ FCC 00-104, § 52.15 (g) (3) (B) (iv).

- 5.2.2 Respond within 7 calendar days from the date of receipt of an application form by completing the response portion that is part of these guidelines (See Appendix D, II). For an NXX assigned to a pool, the CO Code Administrator shall also set the "Pool Indicator" on the CO Code ACD screen in BIRRDs to designate that the NXX is assigned to a pool. For those NXXs which the "Pool Indicator" has been set, the CO Code Administrator shall provide a Central Office Code (NXX) Assignment Request - Part 3 (Administrator's Response/Confirmation) directly to both the PA and the Code Holder whose OCN appears on the request form.

The NANPA must notify the carrier in writing of its decision to withhold numbering resources within 7 calendar days of receiving a request for numbering resources.⁵ If the Code Administrator suspended the application within two business days of the end of the seven-day interval, the seven-day period may be extended up to two business days. Although the NANPA is required to withhold numbering resources from any U.S. carrier that fails to comply with reporting and number resource application requirements, state commissions have been delegated authority to affirm or overturn a NANPA decision to withhold initial numbering resources.⁶

- 5.2.3 Review the documentation, verify the carrier's need, and determine if the code request is in compliance with these code assignment policies and guidelines. The NANPA must ensure that SPs satisfy the MTE requirement and the utilization threshold before obtaining additional numbering resources.⁷ In cases where a code application is denied or suspended, NANPA will:
- a) provide specific reasons for the denial to the applicant in writing and information regarding where and how to appeal the administrator's decision, or
 - b) provide an explanation for the suspension (other than minor errors as noted above) and whether the applicant needs to give further information/documentation.
- 5.2.4 Select an unassigned code for assignment provided the code is not currently being aged due to an NPA split.
- 5.2.5 Monitor CO code usage in order to determine the need for relief or declaration of jeopardy, and notify NPA Relief Coordinators as appropriate. The NPA Relief Coordinators will then perform the notification functions in relief and jeopardy situations (See Section 9).
- 5.2.6 Maintain records on codes assigned plus those available.

⁵ FCC 01-362, § 52.15 (g)(4).

⁶ FCC 00-104, ¶ 98.

⁷ FCC 01-362, ¶ 50, 56.

5.2.7 Perform applicable CO Code utilization surveys as detailed in Section 6.4.1.

5.2.8 Verify that the code applicant has submitted a current NRUF Report.

5.2.9 Deny the application if the NANPA has received written direction and supporting documentation from the appropriate regulatory authority to do so, due to jurisdictional certification or licensing revocation.

~~5.2.9~~ 5.2.10 Ensure, concurrent with assignment or disconnect of an NXX to a code applicant, the NPA, NXX, effective date and OCN of the code applicant are input into BIRRDs to indicate that a specific NXX has been assigned by NANPA to an applicant or that a disconnect has been approved by NANPA. Completion of this step will allow the input of Part 2 data entries into BIRRDs that may or may not be performed by the CO Code Administrator (See Code Activation and In Service Timeline in Appendix D, II). Initiate code reclamation if assigned code is not activated and in service within 60 days of expiration of the service provider's applicable activation deadline.⁸ The NANPA shall abide by the state commission's determination to reclaim numbering resources if the state commission is satisfied that the service provider has not activated and commenced assignment to end users of their numbering resources within six months of receipt.⁹

~~5.2.10~~ 5.2.11 Respond to the code applicant or the PA in writing via the appropriate "Administrator's Response--Receipt of the Part 4" form within 7 calendar days of receiving the Part 4 or the Part 4-PA. The response may include, but not be limited to, the following:

- Part 4 Form Received and Approved
- Invalid Part 4 Form Received
- Delinquent Part 4 form Received

Also, INC added the following definition as a new glossary term to the glossaries of the COCAG and TBPAG:

<u>Parent Company OCN</u>	<u>The OCN of the highest related legal entity located within the state for which the SP is reporting data or requesting resources. See also 47 CFR § 52.15 (f) (3) (ii).</u>
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⁸ FCC 00-104, § 52.15 (i) 6.

⁹ FCC 00-104, § 52.15 (i) 5.

4 The Proposed Solution

The National Pooling Administrator reviewed the above-stated amendments to the TBPAG and Part 3 form and submitted Change Order 21 on August 5, 2011 with modifications that addressed the amendments. On August 29, 2011 the PA withdrew that change order proposal in response to a request from the NOWG for additional functionality in the solution. The NOWG requested that our solution be modified to include a new drop-down list for the Parent Company OCN, replacing the free-form field that exists today. This request does not conflict in any way with the INC resolution. The solution proposed below addresses both the original INC issue and the NOWG proposal.

Pooling Administration System Updates:

PAS will be updated to reflect the addition of the Parent Company OCN to the Part 3 *Pooling Administrator's Response/Confirmation* form. With the addition of the Parent Company OCN field to the Part 3, two new data fields (*Parent Company OCN* and *Parent Company Name*) will also be added to the online, downloadable, and printable versions of the Part 1/1A report and Part 3 report for all users. The PA Activity Report; Part 1/1A report (tab1) and Part 3 report (tab 2) will also be updated to reflect the Parent Company OCN and Parent Company Name which is sent to the state users who request the PA Activity Report (daily, weekly, or monthly).

The Parent Company OCN will be populated with the OCN selected by the applicant in Section 1.2 *Parent Company OCN* on the Part1/1A form. The Parent Company Name will be populated with the company name appearing for that OCN from the PAS OCN/Company table. In addition, the Parent Company OCN and name will only be populated for applications processed after implementation of this change order.

At the request of the NOWG, the “Parent Company OCN” field on the Part 1A and Part 1/1A screens in PAS will be modified from an alphanumeric field to a drop-down list of those OCNs entered into the service provider user’s profile.

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 our day- to-day operations. The changes as a result of INC Issue 710 should be implemented in PAS at the same time they are implemented in NAS to ensure consistency in the overall administration of central office codes and thousands-blocks. Should NANPA be in a position where it is unable to implement changes resulting from INC Issue 710 in NAS, the comparable changes in PAS will be similarly delayed.

When an applicant requests a thousands-block, the Parent Company OCN selected by the applicant will appear on the PAS-generated Part 1/1A and Part 3 reports, along with the name appearing in the *PAS OCN/Company* table for the entered OCN. . If at some future date the industry agrees to permit the applicant to make a modification/correction to the *Parent Company OCN* field, additional development will be required in PAS to permit this new functionality.

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, Part 3 form, and the NOWG request, and is consistent with the terms of our contract. We respectfully request that the FCC review and approve this change order.