



National Pooling Administration

Contract #CON07000005

Change Order Proposal #22

(INC Issue #698– Auto-Populate Total Numbering Resources on
TBPAG MTE Form)

August 5, 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

Some state commissions manually validate the carriers' *Thousands-Block Months to Exhaust and Utilization Certification Worksheet – TN level* (Appendix 3) form (MTE) since there is no automated validation in PAS. They would like to have this process automated to save them time. In its resolution of the issue, the INC added language to the TBPAG which resulted in adding a new report in PAS to assist service providers with completing the TBPAG MTE form and to assist state commissions in reviewing the TBPAG MTE form.

The INC issue statement is reproduced below.

INC Issue Statement:

At INC 112, INC discussed GS-655 and GS-658, which documented concerns of the staff at some state commissions. Specifically one of the concerns brought to INC's attention was that the validation of a service provider's total resources on the Thousands-Block Months to Exhaust and Utilization Certification Worksheet – TN level (Appendix 3) form must be performed manually, as there is no automated validation in the Pooling Administration System (PAS). INC should consider having the service provider's total numbering resources and the list of NXX codes and blocks currently allocated to the applicant's OCN automatically populated in PAS to save validation time for both state commission staff and service providers.

3 Industry Numbering Committee (INC) Resolution

On July 29, 2011, the INC placed Issue 698 – Auto-Populate Total Numbering Resources on TBPAG MTE Form into final closure, with the following language:

Resolution from INC:

INC reached consensus that the PA shall create a new "Total Numbering Resources" report to be made available for viewing or download in PAS that would demonstrate and calculate the total numbering resources by state, NPA, and rate center for each OCN in the applicant's PAS profile. The report shall demonstrate 1000 for each block and 10,000 for each non-pooled code, to calculate and provide the total resources in the rate center. The PA shall use its Blocks Assigned and/or Retained Report (real-time) and the NANPA's CO Codes Utilized Report (downloaded nightly) to calculate the total numbering resources by rate center and state for a particular OCN. The Total Numbering Resources report shall be made available for viewing and/or download in PAS by the service provider and/or authorized state commission staff. Service Providers and state commission users can only view data based on what is in their respective PAS profile.

In addition, the NANPA shall add a "Pooled Code Indicator" to its CO Codes Utilized Report posted on the NANPA website to further assist service providers and states in validating the total resources calculation. In cases where a non-pooled code becomes pooled, the PA shall notify NANPA.

INC understands that these actions will likely produce NANPA and/or PA change orders which must be approved before this resolution can be implemented.

Finally, to make SPs aware of the availability of the Total Numbering Resources Report in PAS, INC edited the **Thousands-Block Number (NXX-X) Pooling Administration Guidelines** as follows:

4.3 Block Applicant Responsibilities

Block Applicants, requesting resources from the industry inventory pool, shall:

- a) be licensed or certified to operate in the rate center. Applications for initial numbering resources will include documented proof that (1) the applicant is authorized to provide service in the area for which the numbering resources are requested, and (2) the applicant is or will be capable of providing service within 60 calendar days of the numbering resources activation date.²

Specifically, carriers must provide, as part of their applications for initial numbering resources, evidence (e.g., state commission order, or state certificate to operate as a carrier) demonstrating that they are licensed and/or certified to provide service in the area in which they seek numbering resources. Carriers requesting initial numbering resources must also provide the PA appropriate evidence (e.g., contracts for unbundled network elements, network information showing that equipment has been purchased and is operational, or will be operational, business plans, or interconnection agreements) that its facilities are in place, or will be in place to provide service within 60 calendar days of the numbering resources activation date;³

- b) complete the Thousands-Block Application Forms per these guidelines;
- c) provide evidence that, given their current utilization and recent historical growth, they need additional numbering resources.⁴ A block applicant may obtain the quantity of total numbering resources allocated to its OCN in a particular rate center from the Total Numbering Resources report available in PAS.⁵ The block applicant should be aware that the report does not incorporate grandfathered codes or blocks in the calculation that are still a part of the block applicant's inventory (See also Section 2.13). In such

² 47 CFR § 52.15 (g) (2)

³ 47 CFR § 52.15 (g) (2)

⁴ 47 CFR § 52.14 (g) (3)

⁵ Authorized state commission staff also may view the Total Numbering Resources report in PAS by OCN and rate center for a particular SP within their state.

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cases, the block applicant shall include all resources, including the grandfathered code and/or blocks still in its inventories, in its total resources calculations.

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SPs disputing the PA's decision to withhold initial numbering resources upon a finding of noncompliance may appeal the PA's decision to the appropriate state commission for resolution.⁶ The state commission may affirm or overturn the PA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements.⁷

All applicants for growth numbering resources shall achieve a 75% utilization threshold for the rate center in which they are requesting growth numbering resources⁸.

- d) provide an Operating Company Number (OCN), which uniquely identifies the applicant. The OCN cannot be shared with another SP. The PA will not issue numbering resources to a carrier without an OCN.⁹ The applicant can obtain OCN information by contacting NECA.

6.2 Service Provider Forecast and Utilization Reporting Requirements

The following are the SP reporting requirements for thousands-block number pooling:

- a) provide Thousands-Block Forecast data as specified in the form in Appendix 1 when applicable;¹⁰
- b) provide NRUF data in accordance with NRUF guidelines (ATIS-0300068) by the February 1st and August 1st dates;~~and~~
- c) SPs providing service in multiple rate centers shall submit an NRUF and Thousands-Block Forecast Report (Appendix 1) incorporating each rate center.
- d) SPs shall provide the Appendix 3: Thousands-Block Pooling Months to Exhaust Certification Worksheet – TN Level when requesting additional blocks for growth. An SP may obtain the quantity of total numbering resources allocated to its OCN in a particular rate center from the Total Numbering Resources report available in PAS. An SP should be aware that the report does not incorporate grandfathered codes or blocks in the calculation that are still a part of the SP's inventory (See also Section 2.13). In such cases, the SP shall include all resources, including grandfathered code and/or blocks in its inventories, in its total resources calculations.

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⁶ 47 CFR § 52.15 (g) (4)

⁷ 47 CFR § 52.15 (g) (4)

⁸ 47 CFR § 52.15 (h)

⁹ 47 CFR § 52.15 (g) (4)

¹⁰ 47 CFR § 52.15 (f) (4) (i)

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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.

A new *Total Numbering Resources Report* will be created and will be available for the SP, SPC, state, FCC and pooling administration users. This new report will be added under the Reports tool. Service providers and service provider consultants will be able to view only the data for the states, NPAs and OCNs in their user profile. State users will be able to view only the data for their state. The FCC and pooling administration users will be able to view data for all states, NPAs, and OCNs.

The *Total Numbering Resources Report* will provide a list of a service provider's assigned and retained pooled blocks and assigned non-pooled codes for a given state, NPA, rate center, and OCN. The assigned and retained block data will be pulled from the *Assigned Block Report* and the *Retained Block Report* in PAS and will be real-time. The assigned non-pooled code data will be pulled from the *NANPA All Code Report* and will be updated nightly (only codes showing a status of Assigned and a Pooling Indicator of N will be added to the report). Grandfathered blocks and codes will not be included in the report. The new report will also include a "Quantity" column which will be populated with "1,000" for an assigned or retained block; or "10,000" for an assigned non-pooled code, and a "Total Number of Resources" field which will be the sum of all resources in the Quantity column.

In addition, PAS will generate and send an email to NANPA automatically whenever the pooling status (Pooling to non Pooling or non Pooling to Pooling) for a code changes.

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 only. The changes resulting from INC Issue 698 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, or must delay implementing, changes resulting from INC Issue 698 in NAS, the comparable changes in PAS will be similarly delayed.

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