

# **National Pooling Administration**

**Contract #CON07000005**

**Change Order Proposal #23**

(INC Issue #715– Update TBPAG for retrieving a block  
donated/returned in error)

June 1, 2012

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# 1 Introduction

## 1.1 Purpose and Scope

In accordance with Neustar's National Pooling Administration contract<sup>1</sup> 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.

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<sup>1</sup> FCC Contract Number CON07000005.

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 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

There is a distinction between blocks that are returned to the pool and blocks that are donated to the pool. Blocks that have been assigned to a service provider by the PA will use the return process in PAS if a block needs to be returned to the pool. Blocks that have not been previously assigned by the PA, can be donated to the pool.

Over the years, language in the *Thousands-Block Pooling Administration Guidelines* (TBPAG or guidelines) about retrieving an over-contaminated block donated or returned in error was modified on several occasions, which resulted in outdated and conflicting language. The TBPAG advised that months-to-exhaust (MTE) and utilization requirements are waived when a service provider wishes to retrieve an over-contaminated block from the pool that was returned to the pool in error, but the TBPAG did not provide direction on the steps required to retrieve that block.

The current process had companies selecting the "State Waiver Received" button to retrieve those blocks. Some companies expressed concerns with selecting the "State Waiver Received" radio button since the request is not a traditional state waiver. In addition, although the TBPAG provided direction on how to retrieve blocks donated in error, the block contamination level was not considered in the process.

The INC issue statement is reproduced below.

### ***INC Issue Statement:***

The process outlined in Section 3.11 of the TBPAG is no longer valid due to enhancements in PAS and guideline enhancements related to block contamination.

Currently, the INC guidelines do not provide direction on the steps required to retrieve a block returned in error. However, the PAS User Guides indicate that blocks returned in error may be retrieved prior to the block disconnect effective date by submitting a Part 1A - cancel block disconnect.

In the event the SP does not cancel the block disconnect prior to the disconnect effective date, the method used to retrieve the block depends on the contamination level of the block:

- If the block is over 10% contaminated, the SP would submit a Part 1A new block request and identify in the remarks field that the block is over 10% contaminated. The MTE and utilization requirements are waived when a block is identified as over 10% contaminated, but in PAS today, the only way to complete a request where the MTE and utilization are not met is to select the state waiver button. While state commissions and the FCC are aware of this process, it isn't documented in the guidelines.
- If the block returned in error is 10% or less contaminated, the SP would also submit a Part 1A new block request, however, it must meet MTE and utilization requirements. If the SP does not meet MTE and/or utilization it may submit a Part 1A block reservation while it requests a safety valve waiver from the appropriate regulatory authority.

The guidelines do provide direction on blocks donated in error, however, the block contamination level is not considered in the process. Per Section 7.27 of the TBPAG, donations made in error where the block has not yet been assigned to another SP may be exchanged for a different block in the same rate center when the SP submits a donation for the block being exchanged and also sends an email communicating the request for the exchange to the PA. If the SP needing to retrieve a donated block does not have a block that it can exchange, the SP may submit a Part 1A new block request to retrieve the block, however it must meet MTE and utilization. If the SP does not meet MTE and/or utilization it may submit a Part 1A block reservation while it requests a safety valve waiver from the appropriate regulatory authority.

INC should determine if there is a need for the processes for block returns and block donations to be different or if the processes for both can be made to be consistent when retrieving an over-contaminated block that was either returned or donated in error. INC should also consider either: 1) adding language to the TBPAG guidelines outlining the use of the state waiver button in instances where blocks are over-contaminated and MTE and/or utilization are not met; or 2) adding a new radio button option in PAS which allows the SP to override the MTE and/or utilization requirements only when submitting an application to retrieve an over-contaminated block in PAS.

### 3 Industry Numbering Committee (INC) Resolution

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On May 18, 2012, the INC placed Issue 715 – *Update TBPAG for Retrieving a Block Donated/Returned in Error* -- into final closure, with the following language:

#### **Resolution from INC:**

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INC agreed that the PA shall add a new radio button on the TBPAG Appendix 3 MTE Form in PAS to retrieve over-contaminated blocks so that the "State Waiver Received" radio button would no longer be used for this purpose. The new radio button shall be labeled "Over-Contaminated Block Exception", and shall only be used 1) to retrieve an over-contaminated block that was returned in error; or 2) to become the new block holder of an over-contaminated block when a request to do so is received from the PA. INC

recognizes that the implementation of this resolution may be delayed until the outcome of a potential PA change order is known.

The following changes were made to the TBPAG:

~~3.11—A block with more than 10 percent contamination that is donated/returned in error to the PA is retrievable by the SP, provided the block is still in the industry inventory pool. This is accomplished via e-mail between the SP and the PA in order to establish an audit trail.~~

### 7.2.7 Block Donation Date

SPs are required to donate protected thousands-blocks (see Section 7.2.4) at the Block Donation Date. A block may only be donated if the block does not contain more than 100 unavailable TNs. This includes the donating SP's unavailable TNs and all other ported TNs identified in NPAC to other SPs. SPs should not donate any thousands-blocks that will be required to maintain their inventory for 6 months beyond the Pool Start/Allocation Date. Thousands-blocks donated by SPs to the PA to initialize the industry inventory pool will be summarized by the PA, per NPA. The PA will provide this summarized data<sup>2</sup> to Telcordia™ Routing Administration (TRA), in a format agreed upon between the PA and TRA after the Block Donation Date and prior to Pool Start/Allocation Date that takes into consideration a time frame requirement for the PA to compile the data. This data should be provided within 2 business days.

It is imperative that SPs complete their intra-service provider ports (ISPs) and protect the thousands-block from further TN assignments before the Block Donation Date. If ISPs in the NPAC are not completed and a donated contaminated block is assigned, there may be service disruptions including double assignments, for those contaminated TNs.

As noted above, on the Appendix 2 form there is a field for SPs to confirm that ISPs have been completed. In completing the "Have All IntraSP Ports Been Completed?" field for each block to be donated SPs must identify those ports as complete "Y" or not yet completed "N."

Blocks may be donated with a "N" in this field only on or before the Block Donation Identification Date during initial pool establishment.

If a block is initially donated with "N" in this field, the Appendix 2 form must be updated and resubmitted confirming the completion of the ISP(s) on or before the Block Donation Date. If the "N" is not updated to a "Y" indicating completion of the ISP(s) on or before

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<sup>2</sup> From this data, the identification of thousands-blocks that have been retained by the Code Holders can be determined. TRA will then initialize the data for the retained thousands-blocks in BIRRDs resulting in creation of the BCD/NXD records. Within this process, the LERG Assignee is the CO Code Holder donating the thousands-blocks. All appropriate data associated with the CO Code Holder will be used to build the BCD/NXD records for those thousands-blocks retained by the SP. The Effective Date for all thousands-block(s) retained by the LERG Assignee will be the same as the Block Donation Date.

the Block Donation Date, those donations will be rejected by the PA and a new Appendix 2 form must be submitted for the rejected blocks.

Once the Block Donation Date has passed, ISP(s) must be completed before an Appendix 2 form is submitted to the PA.

An SP donating or returning a block containing a test line number shall disconnect the number prior to donation or return. The test line shall be reassigned to a number in a block retained by, or assigned to, the SP.

After the Block Donation Date:

- ISP(s) must be completed before an Appendix 2 form is submitted to the PA.
- If block donations are submitted using Appendix 2 via PAS, the PA shall process the donation within 7 calendar days. If donations are submitted by any other method, the PA has an additional two business days for processing.
- A block may only be donated if the block does not contain more than 100 unavailable TNs. This includes the donating SP's unavailable TNs and all other ported TNs identified in NPAC to other SPs.
- For any donations from a non-pooled NXX, the AOCN is responsible for entering its specified routing and rating information for those retained thousands-blocks. The retained thousands-block will not appear in the LERG Routing Guide until the AOCN has performed this task.
- For any subsequent donations of previously retained blocks from a pooled NXX, the block(s) to be donated must be disconnected by the AOCN in BIRRDs before donation. An SP should use the Other Information section in Appendix 2 if block(s) donated have any special status or treatment, e.g., restricted use, chatline, etc.

Prior to donating the thousands-block(s)/NXX code(s) to the industry inventory pool, SPs must confirm that:

- a) the block may only be donated if the block does not contain more than 100 unavailable TNs. This includes the donating SP's unavailable TNs and all other ported TNs identified in NPAC to other SPs.
- b) all unavailable TNs within contaminated thousands-blocks/NXXs have been ISP ported;
- c) the block has been protected from further SP number assignment on or before the Block Donation Identification Date or at the time of donation on subsequent block donations;

- d) the associated NPA/NXX is currently available for call routing and is flagged as LNP capable in the LERG Routing Guide and the NPAC, and the NPA-NXX query triggers are applied in all switches and reflected in the appropriate network databases (e.g., STP routing tables);
- e) the NXX-assigned switch is currently LNP-capable and will process terminating traffic appropriately;
- f) interconnection facilities have been established between the NXX-assigned switch and other interconnecting networks; and
- g) an SP should use the Other Information section if block(s) donated have any special status or treatment (e.g., restricted use, chatline, etc.).

The interval between the Block Donation Identification Date and the Block Donation Date will be determined by industry consensus. However, in no case will the interval be less than 30 calendar days.

Subsequent to the Block Donation date but before the block has been assigned to another SP, the SP may need to retrieve a block it had previously donated to the pool. For example, the SP may have made an LNP-capable block an LNP-capable block, or failed to protect the block from further number assignments made after block protection, customer request, etc. If an SP donates a block in error with more than 10 percent contamination, the SP may retrieve the block from the PA, provided the block is still in the Industry Inventory Pool. To retrieve the more than 10 percent contaminated block, the SP shall send an email to the PA with an explanation for the requested block retrieval.

If an SP donates a block in error with 10 percent or less contamination in error, the SP may exchange the block for another of its own blocks in the same rate center as long as the block is still available in the Industry Inventory Pool. To exchange a block that is 10 percent or less contaminated, the SP shall send an email to the PA with an explanation for the block exchange, which shall include the block being donated to the pool and the block being retrieved. e-mail with the PA, the SP may exchange its own blocks if the block is still available in the Industry Inventory Pool. Prior to sending the email, the SP shall submit the block donation in PAS. However, blocks automatically donated to the pool from a new NXX code assigned for pool replenishment or to establish an LRN are not available for exchange as these blocks were not a part of the SP's inventory.

If this the block is 10% or less contaminated and an exchange cannot be accommodated, then the SP must shall apply for the block via a Part 1A. In the case where the SP needs one of its own blocks back, but cannot meet the MTE/ or utilization requirements, the SP shall submit a Part 1A to reserve the block while it seeks a safety valve waiver from the appropriate regulatory authority. The SP shall provide a statement of certification including the date the waiver was submitted and the denial tracking number from PAS for the waiver request (if available) to the PA via the "Remarks" field on the Part 1A. Blocks shall remain in a reserved status for three (3) months from the date the Part 3 is approved

for the block reservation request, unless the block is assigned or the reservation is cancelled or extended prior to the block reservation expiration date. An SP may request one three (3) month reservation extension if the appropriate regulatory authority has not acted upon the SP's waiver request by the original block reservation expiration date. An SP shall cancel its block(s) reservation immediately when the SP determines that it no longer needs the block(s) or the appropriate regulatory authority denies the SP's waiver request.

If a pending LNP port exists for an unavailable TN(s) within a contaminated thousands-block that is being donated, the two SPs involved in the LNP port ~~must~~ shall work cooperatively to resolve the pending LNP port. This process could be accomplished by having the recipient SP of the LNP port, cancel the pending LNP port so that the donating SP can perform the ISP(s) for thousands-block donation purposes. Afterwards, the recipient SP of the LNP port would then re-establish the pending LNP port. Another alternative would be to have the SPs involved attempt to advance the pending LNP port through contact with the NPAC.

The quantity of pending LNP ports (not ISPs) that must be addressed should be considered by the industry when establishing the overall schedule for thousands-block donation. A large quantity of pending LNP ports may require a longer interval between the Block Donation Identification Date and Block Donation Date. This information may not be available at the First Implementation Meeting.

Failure to address all pending LNP ports at the time of thousands-block donation will result in a rejection of the NPAC activation when that thousands-block is subsequently allocated to an SP following industry inventory pool establishment. See Section 8.3.8.

- 8.7 When a block available in the industry inventory pool is identified as being more than 10% contaminated, the PA shall request an ad hoc report from NPAC within seven calendar days of being notified of the over 10% contamination.

If the only active or pending LNP ports on the block(s) are ISPs to the Code Holder of the pooled NXX, the PA shall request that the Code Holder of the pooled NXX place the block(s) back into its inventory. The PA shall use the latest contact information that Pooling Administration has on file for the Code Holder of the pooled NXX. SPs also may designate a special contact for this purpose by providing contact information to the PA. MTE and Utilization requirements are waived when retrieving a block that is over 10% contaminated. ~~and r~~ Retrieval by the Code Holder may be accomplished via e-mail with the PA. The PA shall then update PAS to show the block as retained by the Code Holder of the pooled NXX. ~~MTE and Utilization requirements are waived when retrieving a block that is over 10% contaminated.~~

~~If~~ When necessary, if there are active or pending LNP ports to SPs other than the Code Holder of the pooled NXX, the PA shall first contact the SP with the most ports, providing the number of ports for the SP in the email, and requesting that the SP become the new block holder. The SP with the most ports will have five business days from the date of receipt of the PA's notification to respond with a complete and accurate Part 1A

New Block Request. If the SP with the most ports does not respond, the PA shall contact all affected SPs shown on the NPAC report, requesting that one of those SPs become the new block holder. The affected SPs shall have five business days from the date of receipt of the PA's notification to respond with a complete and accurate Part 1A new block request. If ~~this the~~ block will be the SP's initial block for the rate center, the SP ~~must still~~ shall ensure that it satisfies the license and/or certification and facilities readiness requirements and provide the appropriate documentation with the request. MTE and Utilization requirements are waived when accepting a block that is over 10% contaminated, however the SP should provide an explanation in the #Remarks field on the Part 1A stating that it is responding to the PA's request for a new block holder ~~on of an~~ over-over-contaminated block, and shall select the radio button labeled "Over-Contaminated Block Exception" on the MTE form in PAS, which waives the MTE and utilization requirements and allows the application to be submitted (See PAS User Guide for SPs & SPCs at www.nationalpooling.com for more information). The PA shall use the latest contact information that Pooling Administration has on file for the affected SPs. SPs also may designate a special contact for this purpose by providing contact information to the PA.

The first SP to respond to the PA with a complete and accurate Part 1A new block request shall become the new block holder. Only the receipt of a Part 1A new block request via PAS shall be accepted as an official request. The PA shall process the new block request and provide a Part 3 to the new block holder. The PA also shall notify all affected SPs that a new block holder has been selected.

Upon approval of the new block request, the PA shall create the BCD record in BIRRDS with the new block holder's information. The new AOCN is responsible for creating BIRRDS data with the specified routing and rating information for the thousands-block. The thousands-block information will not appear in the LERG Routing Guide until the AOCN has performed this task.

If no SPs respond within the allotted timeframe or all decline to become the new block holder, the PA shall request the appropriate regulatory authority's approval within 30 calendar days to disconnect the ports and return the pristine block back into the industry inventory pool. If the appropriate regulatory authority directs the PA to disconnect all ports, via written confirmation, email or fax, the PA shall provide the NPAC with written notice from the appropriate regulatory authority in order for the NPAC to remove all records in its database related to the block, including ISP Ported TNs.

## 9.1 Code Holder of a pooled NXX /Block Holder Responsibility

- 9.1.1 If the Code Holder of a pooled NXX no longer provides service in the rate center associated with the NXX code, it must notify the PA. SPs shall not enter NXX code disconnect information in appropriate databases until both the PA and NANPA have approved the request to return the NXX and have responded with their respective Part 3 dispositions. The Code Holder of a pooled NXX shall donate all retained blocks in the NXX to the pool that contain 10% or less contamination prior to returning a code; this includes the Code Holder's unavailable TNs and all other ported TNs identified in NPAC

to other SPs. Appendix C of the Central Office Code (NXX) Assignment Guidelines (COCAG) outlines the process to be followed.

**9.1.5** The Block Holder to which a thousands-block(s) has been assigned from the industry inventory pool shall return the thousands-block(s) via the Part 1A form to the PA if:

- a) it is no longer needed for the purpose for which it was originally assigned, including no longer providing service in the rate center; or
- b) the service it was assigned for is disconnected; or
- c) the block contains no more than 100 unavailable TNs<sup>3</sup> and the block is not needed to maintain a six (6) month inventory; or
- d) the thousands-block(s) was not placed in service within six months of the original block effective date returned on the Part 3 and entered onto the BCR/BCD screen in BIRRDS.

9.1.6 If the thousands-block(s) was not placed in service within six months of the original block effective date returned on the Part 3 and entered onto the BCR/BCD screen in BIRRDS, the assignee may apply to the appropriate State Commission point of contact<sup>4</sup> for an extension date. Such an extension request must include the reason for the delay and a new in service time commitment (i.e., applicable activation deadline).<sup>5</sup> The assignee must apply to the appropriate FCC point of contact if the appropriate state commission has declined to exercise its delegated reclamation authority. If an extension is approved, the regulator will notify the assignee and the PA of the new in service deadline and indicate to whom the Part 4 should be sent. A list of appropriate state commission contacts and the FCC point of contact for those state commissions who decline to exercise their authority can be located at the PA website.

9.1.7 When a ~~The~~ block holder is returning a thousands-block to the PA, the block holder is required to complete the following fields on the Part 1A form in order for the PA to update the contamination information for the block:

a) Block contaminated? (Yes or No)

b) If contaminated, how many TNs are not available for assignment? (Enter quantity)

- If the SP enters a quantity greater than 100, the request shall be denied unless the SP notes that it is exiting the market in the Remarks field.

~~b)c)~~ Have all IntraSP ports been completed? (Yes or No)

- If the SP answers “No,” the request shall be denied.

<sup>3</sup> Unavailable TNs includes both the SP's unavailable TNs and all other ported TNs identified in NPAC as ported to other SPs.

<sup>4</sup> 47 CFR § 52.15 (i)

<sup>5</sup> 47 CFR § 52.15 (i) (4-6)

~~e)d~~ Has the block been protected from further assignment? (Yes or No)

If the SP answers “No,” the request shall be denied.

A block may only be returned if the block does not contain more than 100 unavailable TNs. This includes the returning block holder’s unavailable TNs and all other ported TNs identified in NPAC to other SPs.

It is imperative that SPs complete their intra-service provider ports (ISPs) and protect the block from further TN assignment prior to the submission of the Part 1A form ~~with the Block Return~~ to return the block. If ISPs in the NPAC are not completed, ~~or~~ the block is not protected from further TN assignment, and a returned contaminated block is assigned, there may be service disruptions to customers assigned numbers from the block and potentially including double assignments for those contaminated TNs. See Section 8.3.1.1 for resolution of double assignments.

- 9.1.8 In cases where the block holder is exiting the market voluntarily and returns a block indicating that it is over 10% contamination (101 TNs or more), the SP shall state in the remarks field of the Part 1A that it is exiting the market. The number of contaminated TNs includes the returning block holder’s unavailable TNs and all other ported TNs identified in NPAC to other SPs. The PA shall request an ad hoc report from the NPAC, generated during off-peak hours, that identifies the SPs and associated quantities of ported TNs in the returned block. This information shall assist the PA in re-allocating the block, if TNs ported to other SPs are found within the ~~NPA-NXX-X~~ block. The PA ~~may~~ shall use these reports to provide each potential block holder with the total number of ported TNs it has, number of SPs with ported TNs, and the total number of ported TNs overall.

If the block being returned by the SP is over 10% contaminated and the SP does not indicate it is exiting the market, the PA shall deny the return.

#### 9.1.9 Blocks Returned In Error

If an SP returns a block to the PA in error and the block disconnect request has been processed but the effective date of the return has not yet passed, the SP may cancel the block return in PAS.

If an SP returns a block to the PA in error and the block disconnect request has been processed, but the effective date of the return has passed and the block is still available in the Industry Inventory Pool, the SP may retrieve the block by submitting a Part 1A.

- If the block is 10% or less contaminated and the SP cannot meet the MTE and utilization requirements, the SP shall submit a Part 1A to reserve the block while it seeks a safety valve waiver from the appropriate regulatory authority. The SP shall provide a statement of certification including the date the waiver was submitted and the denial tracking

number from PAS for the waiver request (if available) to the PA via the “Remarks” field on the Part 1A. Blocks shall remain in a reserved status for three (3) months from the date the Part 3 is approved for the block reservation request, unless the block is assigned or the reservation is cancelled or extended prior to the block reservation expiration date. An SP may request one three (3) month reservation extension if the appropriate regulatory authority has not acted upon the SP’s waiver request by the original block reservation expiration date. An SP shall cancel its block(s) reservation immediately when the SP determines that it no longer needs the block(s) or the appropriate regulatory authority denies the SP’s waiver request.

- If the block is more than 10% contaminated and the SP cannot meet the MTE and utilization requirements, the SP shall submit a Part 1A, and include a statement in the Remarks field certifying that the block was returned in error and is more than 10% contaminated. In PAS, the SP shall select the radio button labeled “Over-Contaminated Block Exception” on the MTE form, which waives the MTE and utilization requirements and allows the application to be submitted (See *PAS User Guide for SPs & SPCs* at [www.nationalpooling.com](http://www.nationalpooling.com) for more information).

Based on these amendments to the guidelines and new language, service providers may now select a new “Over-Contaminated Block Exception” radio button to retrieve an over-contaminated block that was returned to the pool, when the MTE and/or utilization requirements are not met. Additionally, INC clarified the process for retrieving a block donated/returned in error by removing conflicting language.

## 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 “Over-Contaminated Block Exception” radio button will be added to PAS for SP and SPC users to select to retrieve an over-contaminated block from the pool when the MTE and/or utilization requirements are not met.
- A new “Over-Contaminated Block Retrieval” work item will be created in PAS for the PA, PAM, and SPS users when the “Over-Contaminated Block Exception” radio button is selected, and
- New standard language will be automatically added to the Part 3 remarks field to identify these types of requests.

## 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.

## 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.