

Native Block Pooling Procedures

North American Number Council
Wireless Number Portability Subcommittee
Wireless Pooling Task Force

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1. Purpose

The Pooling Task Force provides a forum for the identification, discussion and resolution of issues affecting wireless implementation of all areas and associated area codes that will be participating in pooling by November 24, 2002.

The Pooling Task Force has created these procedures for the use of Native Block Pooling (NBP) to begin the transition of wireless Service Providers (SPs) to National Thousand Block Numbering Pooling, here after referred to as traditional pooling. The original Native Block Pooling Proposal created by the Pooling Task Force was submit to the NANC on January 4, 2002. At the January 15, 2002 NANC meeting, there was no objection to the Native Block Pooling proposal and its implementation.

These procedures will be used until such time as there are modifications or objections that may cause document revisions.

2. Background

2.1 Traditional Thousands -block Number Pooling

Traditional thousands-block number pooling of geographic telephone numbers, using the LNP capability, is a number administration and assignment process that allocates numbering resources using a shared industry inventory associated with a designated geographic rate area. In the United States, thousands-block number pooling involves the allocation of blocks of sequential North American Numbering Plan (NANP) telephone numbers within the same NPA/ NXX to different SPs, who serve customers within the same NPA rate area. All ten thousand numbers within each NPA/NXX continue to be assigned to one rate area, but are allocated among multiple SPs at the thousands-block (NXX-X) level. The numbering resource is allocated from a shared industry inventory and is administered in blocks of one thousand numbers (NXX-X) for assignment to SPs participating in that rate area (FCC 00 104, §52.2 (a)).

2.2 Native Block Pooling

NBP is a process that allows wireless SPs to participate in the initial milestones of traditional thousands-block pooling. However, NBP is not traditional thousands-block number pooling. The allocation is not from a shared industry inventory. NBP is a manual paper process. The NXX cannot be shared with other providers. The blocks within the NXX are reserved for the donating SP's use only. Although NBP by FCC definition is not traditional pooling, it is a process that will allow SPs and the Pooling Administrator (PA) to prepare for the transition to traditional pooling beginning November 24, 2002, as mandated by the FCC.

These procedures would permit SPs to voluntarily participate in NBP. By choosing to participate in NBP, a SP will realize a gradual transition to traditional pooling. The process will allow the PA and SPs to manage the transition to traditional pooling more efficiently. NBP offers a phased conversion plan to minimize anticipated adverse impacts.

SPs who are not ready or choose not to implement NBP will not be excluded from submitting forms and other requirements needed to begin donating and receiving thousand blocks from the industry pool on November 24, 2002.

The original NBP proposal can be found at www.npac.com.

3. Implementation Schedule

3.1 National Pooling Roll Out Plan

The First Implementation Meeting (FIM) for the National Thousands Block Pooling Rollout, of traditional pooling, was held in January of 2002, with a pool start date of April 2, 2002. The FCC defined specific NPAs with concentration in the top 100 MSAs. Approximately 21 NPAs will be deployed each quarter with special attention being given to those in jeopardy. Any state pooling trials starting before March 2002 will be transitioned into the national program. States outside of the top 100 MSAs, may petition for pooling in their area if they believe it would be beneficial.

3.2 Wireless Service Provider Catch-Up Plan

There are approximately 108 NPAs with State Pooling trials underway. An additional 7 NPAs per month are scheduled to start pooling as part of the National Thousands- Block Pooling rollout. As of 11/24/02, over 150 NPAs will have some pooling underway with approximately 85 more coming in successive quarters.

Catch up NPA work must be done by wireless SPs in order to “join” in these pools and obtain growth resources from the PA by 11/24/02. To accomplish this, the Pooling Administrator introduced the concept of Native Block pooling during the National Rollout time frame. By participating in the ongoing pool start ups and "catching up" on existing pools, the paperwork will be dispersed over a several month period, easing the 11/24/02 “cutover” to traditional number block pooling.

3.3 Commencement of Native Block Pooling Trial

On 1/8/02, the FIM was conducted for NPAs 804, 434, 641, 724/878 and 303/ 720. These NPAs will be used as a trial to validate the NBP procedures. Participating SPs will provide readouts at the March Wireless Pooling Task Force meeting. Based upon the readouts, upgrades may be made to these procedures.

3.4 The Implementation Plan

The implementation plan is a multi-level process that will help wireless SPs transition to traditional pooling by 11/24/02. One portion relates to the existing state trials, and addresses how wireless SPs can “catch up”. The other portion relates to wireless SP participation in the ongoing national roll out. Integrating these two portions constitutes a unified plan for all of the NPAs with pool starts dates prior to 11/24/02. The chart below projects the anticipated number of NPAs to be implemented per month. Not all SPs will be participating in all pools.

	03/2002 NB Pool Start Date
Number of NPAs in State Trials	Appx 108
Number of FIMs ¹	85
Months to 'catch up'	4 (M-A-M-J)
Catch up NPAs per FIM group	12 to 17 per FIM group
NPAs per Month in National Roll Out to work	7

Using the logic above, the 'catch-up' schedule is shown in the attached report in Appendix A.

3.5 Handling of NPAs in lottery

Lotteries are used as a mechanism to distribute NXXs in instances where there are a limited number of NXXs available for assignment. For the NPAs in the "wireless catch up plan", NPAs without lotteries will be scheduled at the beginning of the NBP schedule; NPAs with lotteries will be scheduled as late in the NBP timeline as possible. NPAs in the national pooling roll out schedule will be incorporated into NBP consistent with the national roll out schedule regardless of whether those NPAs have lotteries.

4. Wireless Service Provider Participation

This section outlines how wireless SPs may opt in to NBP. When a wireless SP chooses to opt in to the NBP process, it agrees to obtain thousand blocks from the PA in pooling rate areas, in the designated NPA(s). The wireless SP also accepts the responsibility of following the procedures contained in this document. Wireless SPs cannot participate in NBP prior to the national roll out and NBP schedules.

To participate in NBP, the wireless SP should provide the Pooling Administrator associated with that NPA(s) via email, the following information. Once the wireless SP opts to participate in NBP, they must provide the information listed below via email to the appropriate Pooling Administrator for the NPA.

1. Company Name (consistent with the OCN, see Note 1)
2. NPA(s)
3. OCN
4. Contact
5. Contact TN
6. Fax #
7. Email

Note 1: Optionally, the Parent Company Name can be included

¹ If an NPA is currently involved in a split (during permissive dialing) or overlay, all NPAs in that group are considered as one. Therefore, even though there are 108 NPAs that will be in pooling by 11/24/02 there will be 85 groups of NPAs in FIMs.

4.1 **Opting Into Native Block Pooling per the FIM Milestones**

Wireless SPs may choose to opt into any or all NPAs on the NBP schedule, as NBP is a voluntary process. Once a SP has opted into an NPA, there is no opting out of that NPA. Milestones are administrative requirements of the wireless SPs who choose to participate in NBP. Due dates are established for the milestones at the FIM. The participating wireless SPs will complete the following milestones by the due dates established at the FIM:

Forecast Report

Block Protection

Block Donation Identification

NBP will begin on the Pool Start Date.

4.2 **Post FIM Participation**

Subsequent to the NBP FIM milestone dates, a wireless SP may choose to opt into a previously implemented NBP NPA. If a wireless SP chooses to opt into a previously implemented NBP NPA, they must contact the PA associated with that NPA and agree to milestone due dates.

5. **Participation Process**

A check list has been provided here to help SPs get through the various NPB milestones. Each of the items in the checklist is detailed below.

Items to do for NPA	Date to be completed	Completed
Attend First Implementation Meeting		
Forecast Report Due to PA		
Block Protection		
Block Donation Form Due to PA		
Native Block Pooling Pool Start Date		

5.1 **First Implementation Meetings (FIM)**

FIM dates for Native Block Pooling in existing State pooling trials will be set between the industry and NeuStar.

FIMs for all NPAs listed on the National Pooling Rollout schedule will be the same for both the wireline and wireless industry. The National Pooling Rollout Schedule can be found on the numberpool.org website.

The purpose of the FIM is to:

- ◆ Develop the completion dates for each milestone by industry consensus.
- ◆ Inform all SPs of the requirements for thousands-block number pooling, i.e. define and describe the milestones and provide the opportunity for clarification.

FIMs may address multiple NPAs with the same rollout schedule or on an individual basis.

5.2 **Native Block Pooling Pool Start Date**

For all implemented state pooling trials, the wireless industry and NeuStar will agree to a date when all number resources in the specific NPA must be acquired from the Pooling

Administrator by participating SPs. The date agreed upon will become the Mandated Implementation Date discussed in the Thousand-Block Number (NXX-X) Pooling Administration Guideline (TPBAG).

For those NPAs in the National Rollout Schedule, this date will be the same date for the entire industry

5.3 Forecast

5.3.1 Forecast Report Date

The Forecast Report Date is the deadline for all SPs to report their forecasted thousands-block demand to the Pooling Administrator using the Thousand-Block Forecast Report Form. Refer to the TBPG for detail on the associated forms. This is one of the Milestone dates that will be set at the FIM.

5.3.2 Thousands Block Forecast Report

The due date for completing and submitting the Thousands Block Forecast report to the PA will be set at the FIM. The thousands-block forecast is based on a 12-month period, by NPA and rate center.

The Thousands-Block Forecast Report is used by the Pooling Administrator to establish the industry inventory pool. For NBP, the forecast form is used by the PA to establish the individual pools.

Examples of this form can be found as Appendix 1 in the TBNP Guidelines and is also available electronically on the Pooling Administrators Website, www.numberpool.org. Additionally, Thousands-block forecast reports should be submitted by each SP to the Pooling Administrator on a semi-annual basis. Semi-annual is by or on February 1 for the period ending December 31; and by or on August 1, for the period ending on June 30 of each year.

5.3.3 Forecast Updates

If SPs identify a significant change in their thousands-block forecast for a rate area, they should provide an updated forecast for that rate area as soon as possible to the PA.

If a SP submits an application for additional thousands-blocks greater than, their previous forecast, the SP must provide an updated forecast before the blocks can be granted. The SP request may need to be placed on hold if sufficient blocks are not available, allowing the PA sufficient time to replenish the individual SP NBP (or industry inventory pool for traditional pooling) before the request can be granted.

5.4 Thousands Block Protection/Donation

5.4.1 Block Protection Date

This is the deadline for SPs to “protect” specified thousands-blocks (those with up to and including 10% contamination) from further contamination.

The Block Protection Date will be set at the FIM.

5.4.2 Block Donation Identification Date

This is the deadline for SPs to report and donate their surplus of thousands-blocks to the PA.

The Block Donation Identification Date will be set at the FIM.

This report should be done using the Thousands-Block Donation Form. This form is Appendix 1 in the TBNP Guidelines and is also available electronically on the Pooling Administrators website, www.numberpool.org

5.4.3 Block Donation Date

This date is not applicable to NBP but will occur during transition if required.

5.5 Pooling Administrator Assessment

Assessment reports will not be generated for NBP.

5.6 Submittal Forms - Initial and Growth Blocks

Electronic access to the Part 1A, 1B, Forecast and Donation forms requires users to request a User ID and Password. At the PA website, go to FORMS, to fill out a request for a User ID and Password. An electronic reply providing the User ID and Password is usually received within 24 hours. Only the PA can change the password.

5.6.1 Part 1A - Thousands-Block Application Form

This form will be used by SPs to request a thousand-block(s) (NXX-X) within a specific rate center for Initial and Growth Blocks.

Multiple thousands-blocks may be requested on one Form. The form is structured per switch and per rate area. Specific thousands-blocks may be requested on the form. The applicant may also indicate a requirement, or a preference, for sequential numbered blocks. The applicant should also indicate if any thousands-block is acceptable or only certain thousand-blocks will be acceptable due to technical limitations and/or administrative reasons.

SPs must submit a Part 1A advising the PA of changes of to an OCN or Block Effective Date.

A separate Part 1B must be submitted for each block requested on a Part 1A.

All applicants must submit their requests, to the PA, using the electronic Forms found on the PA web site, or via an interface by Electronic File Transfer.

Specific requirements for all field entries can be found in the Thousand-Block Number (NXX-X) Pooling Administrative Guidelines, located on the ATIS web site: www.atis.org

5.6.2 Part 1B - Thousands-Block Application Form

For each Part 1A an applicant submits, it must be accompanied by a Part 1B.

SPs must submit a Part 1B advising the PA of changes to an OCN or Block Effective Date.

Specific requirements for all field entries can be found in the Thousand-Block Number (NXX-X) Pooling Administrative Guidelines, located on the ATIS web site. www.atis.org

5.6.3 Months to Exhaust Worksheet

A Months to Exhaust Worksheet must be submitted with each Part 1A and 1B for growth blocks to document the need for additional number resources.

To be assigned an additional thousands-block(s) for growth, “Months to Exhaust” must be less than or equal to 6 months and utilization % must be met.

Specific requirements for all field entries can be found in the Thousand-Block Number (NXX-X) Pooling Administrative Guidelines, located on the ATIS web site. www.atis.org

5.6.4 Part 4 – Confirmation of NXX-X Block In Service Form

A thousands-block assigned to a SP should be placed in service within 6 months of the Original Block effective date as specified in the Telcordia™ LERG™ Routing Guide. Confirmation that the block has been placed in service is mandatory using the Part 4 Confirmation Form. If the PA does not receive the Part 4, the PA may begin the reclamation process within 60 calendar days of the expiration of the activation deadline. The PA may refer instances of un-activated thousands-blocks to the relevant state commission. If the SP identifies that they will not meet the activation deadline, due to circumstances beyond their control, the SP may request an extension from the state commission or FCC.

The PA shall also use the Part 4 and forward it to the Central Office Code Administrator when the PA has applied for and received a new code to replenish the rate center TN inventory pool.

5.7 Receipt Forms

5.7.1 Part 3 – Pooling Administrator’s Response/Confirmation Form

The Pooling Administrator issues the Part 3 to SPs confirming the assignment of requested Thousand-Block(s)

5.7.2 Part 5 – Reclamation and Return of Thousands -Blocks

This form is used in two unique instances: (1) the return of numbering resources to the PA under the direction of state regulators; (2) if the LERG² Assignee no longer provides service (nor has an LRN) in the rate area associated with the NXX code, i.e., it is no longer needed by the entity for the purpose for which it was originally assigned, the

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² LERG in the phrase LERG Assignee refers to the Telcordia™ LERG™ Routing Guide.

service it was assigned for is disconnected, or the thousands-block was not placed in service within six months of the block effective date.

If the reclaimed or returned thousands-blocks have been entered into the NPAC, the PA must also notify the NPAC of those thousands-blocks by completing the NPAC Thousands-Block Reclamation Form, Part 5, Sections A and B. Notification should include the thousands-block range and the effective date of the return. Upon completion of reclamation at the NPAC, the NPAC will notify the PA, LERG Assignee and Block Holder that the thousands-block has been removed from the NPAC by completing, Part 5 Section C of the NPAC Thousands-Block.

6. Acquisition and Administration of Numbering Resources for NBP SP Inventory Pools

6.1 In General

The PA will maintain a 6 months supply of TNs in each NBP SP inventory-pool, for each rate center. When the PA anticipates that the supply of available TNs will drop below a 6 month inventory for any NBP SP in any rate center, the PA will take the following actions in conjunction with the affected NBP SP to obtain additional NXXs to replenish that particular NBP SP pool. Because the gained resources cannot be shared with other carriers, wireless SPs in NBP should not be treated any differently with respect to the acquiring of codes until the onset of wireless traditional pooling participation.

6.2 Handling of NPA with no lottery

In a non-lottery situation, the PA must request that the NBP SP with insufficient inventory fill out a Central Office Code (NXX) Assignment Request – Part 1 and Part 1A form requesting an additional NXX for that rate center along with all required forms, i.e. MTE. The NBP participant must complete the Part 1 and 1A form and submit them to the PA within two business days. The Part 1 will require a fax and the Part 1A will be submitted on line. The PA will then submit the Part 1 form to NANPA. NANPA will assign the full NXX code to the NBP SP and will submit a Part 3 confirmation to both the PA and the NBP SP. The code will be administered in the manner described in section 6.5 below.

6.3 Handling of NPAs in lottery/jeopardy

In a lottery situation, the PA will request that the NBP SP with the insufficient inventory fill out a Central Office Code (NXX) Assignment Request – Part 1 and 1A forms requesting an additional NXX for the qualifying rate center. The PA is responsible for requesting the Part 1 and 1A forms from the NBP SP in sufficient time to meet the applicable lottery deadlines. The NBP SP must complete the Part 1 form and return it to the PA within two business days of receipt of the PA's request.

The application will be forwarded to the PA who will file it with NANPA for the specific NPA lottery. In some states, a certain number of NXXs are set-aside in each NPA lottery for the exclusive use of non-pooling SPs; other NXXs are reserved for pooling carriers and the PA. In such cases, the NBP participants will be treated as non-pooling carriers and entered into the appropriate lottery based on the jeopardy requirements for that NPA. NBP

participants will not be considered as part of the traditional pooling lottery because the gained resources will not be shared in the traditional pool, rather they will be placed in the Wireless SPs designated pool.

If a NBP SP receives an NXX from the lottery, it will be assigned the full NXX by the NANPA, which will file a Part 3 confirmation with both the PA and the NBP SP. The code will be administered in the manner described in section 6.5 below.

6.4 NXX Administration

Any NXXs received by a NBP SP will be turned over to the PA for administration. The PA will then assign the NBP SP block(s) of 1000 numbers and remaining blocks from that NXX will be reserved in the NBP SP's pooled inventory by the PA for assignment back to the SP when requested. Wireless SPs will still be responsible for the vacant code routing for the entire NXX as the LERG Assignee as under traditional pooling.

6.5 Submission of Emergency Petitions

The FCC has defined a mechanism in its Third Report and Order on Number Resource Optimization³ for the states to hear claims that an exception or safety valve should be applied when the NANPA or Pooling Administrator denies a specific carrier request for numbering resources who can demonstrate the need for additional resources but are unable to meet the criteria for such an assignment.

The FCC granted the states authority, provided that state commissions should only apply a safety valve mechanism as a last resort and, to the extent possible, use it as a stopgap measure to enable carriers in need of additional numbering resources the ability to obtain those resources outside of the NPA's normal allocation process. In light of this decision, the FCC considered and adopted the following scenarios as warranting safety valve consideration:

- (1) to ensure carriers experiencing rapid growth in a given market will be able to meet customer demand;
- (2) a verifiable need has been established that additional resources are needed to meet a specific customer; and
- (3) on a case-by-case basis, determine whether there is a carrier need in the context of multiple switch requirements in a given rate center.

The FCC also determined a timeline for execution of the request for an exception to the NPA-NXX assignment denial. States have 10 business days to act upon a carrier's request for safety value treatment. If a state does not reach a decision within a reasonable timeframe, carriers can submit requests to the FCC for resolution. In addition, carriers can appeal a states safety value decision to the FCC for reconsideration.

³ Federal Communications Commission; *In the Matter of Number Resource Optimization, Third Report and Order and Second Order on reconsideration* CC Docket 96-98 and CC Docket 99-200, FCC 01-362 (December 28, 2001). See paragraphs 57-66.

The FCC has also given a number of states, authority to consider a carriers' requests for numbering resources outside the lottery process.⁴ In addition, the process for obtaining number resources outside of the normal PA process flow has been described in the Thousands Block Pooling Guidelines. It can be accessed at the INC website www.atis.org.

If a NBP SP is not successful in obtaining the numbers it needs to provide service under the processes outlined in sections 6.2 or 6.3 above, then it may file an emergency petition with a state commission or the FCC. If the applicable regulatory body grants the emergency petition, the NBP SP would be assigned the full NXX by the NANPA. The NANPA will file a Part 3 confirmation with both the PA and the NBP SP.

7. Number Resource Utilization and Forecast (NRUF) Reporting

NBP does not impact NRUF reporting requirements. Under NBP, SPs would still file as non-pooling SPs.

8. Transition to Traditional Pooling

Information on the conversion to traditional pooling from NBP will be documented in the Wireless Transition Plan to Thousands-Block Number Pooling.

⁴ See e.g. *In the Matter of Indiana Regulatory Commission Petition for Additional Delegated Authority to Implement Number Conservation Measures*, Order, DA 00-1616, CC Docket Nos. 99-200 and 96-98; NSD File No. L-99-82 (July 20, 2000), ¶ 67; 15 FCC Rcd. 23371.

APPENDIX A - NPA NBP CATCH UP SCHEDULE