North American Numbering Council Meeting Minutes March 20-21, 2001 (Final)

I. Time and Place of Meeting. The North American Numbering Council held a meeting commencing at 8:30 a.m. at the Federal Communications Commission, 445 12th Street, S.W., Room TW-C305, Washington, DC.

II. List of Attendees.

Voting Council Members:

1.	John Hoffman	Sprint PCS
2.	Beth Kistner	ALTS
3.	Ed Gould	AT&T
4.	Wendy Potts	Bell Canada
5.	Randy Sanders	BellSouth
	Lori Messing	CTIA
7.	Jonathan Lee	CompTel
8.	Switzon Wigfall	NARUC
	Hon. Thomas Dunleavy	NARUC
10.	Gregory Pattenaude	NARUC
11.	Hon. Jack Goldberg	NARUC
12.	Peter Pescosolido	NARUC
13.	Natalie Billingsley	NASUCA
14.	Barbara Meisenheimer	NASUCA
15.	David Bench	Nortel Networks
16.	Trent Boaldin	OPASTCO
17.	C. Courtney Jackson	OUR, Jamaica
18.	Harold Salters	PCIA
19.	Gilbert Orozco	SBC Communications, Inc.
20.	Ron Havens	Sprint
21.	David Thompson	TIA
22.	Rose Travers	USTA
23.	Paul Hart	USTA
24.	Chuck Eppert	Verizon
25.	Peter Guggina	WorldCom
26.	Dawn Lawrence	XO Communications

Special Members (non-voting):

John Manning

NANPA

Commission Employees:

Cheryl Callahan, Designated Federal Officer (DFO) Sanford Williams, Acting Alternate DFO Deborah Blue, Assistant to the DFO Diane Griffin Harmon, Acting Chief, Network Services Division (CCB) Patrick Forster, Policy Division (PD), Wireless Telecommunications Bureau (WTB)

III. Estimate of Public Attendance. Approximately 45 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) NANPA Report to the NANC
- (3) Status of Area Code Relief Exhausting within 36 months
- (4) NANPA Oversight Working Group Status Report to the NANC
- (5) INC Report to the NANC
- (6) Letter to Yog Varma, Deputy Chief, Common Carrier Bureau regarding INC Notification to Clarify Initial Code/Block Applications Facility Readiness and License Certification Requirements Under FCC 00-104
- (7) SMS/800 System Overview
- (8) Letter to Chairman Hoffman regarding Neutral Management of Toll Free Database
- (9) SMS/800 Administrative Structure
- (10) SMS/800 Administrative Structure Operational Accountability View
- (11) SMS/800 Administrative Structure Joint Oversight Committee/Neutral Third Party
- (12) Bell South Contribution to the NANC Oversight
- (13) NANC Toll-Free IMG Activity Summary & Status
- (14) Letter to Chairman Hoffman regarding submission by the NANC Toll Free IMG of the Draft Toll Free Technical Requirements Document
- (15) Draft Toll Free Technical Requirements Document
- (16) SMS/800 Customer Satisfaction Survey: Summary of Wave Four (2000) Results
- (17) LNPA Working Group Status Report to NANC
- (18) Wireless Number Portability Operations Status Report to NANC
- (19) Letter to Robin Meier, NIIF Moderator, requesting revisions to NIIF 134 guideline
- (20) Inadvertent Porting Document
- (21) Draft Letter regarding 500/900 Utilization Reporting

- (22) NANC Number Conservation Ad Hoc Charge Report
- (23) Letter from Chairman Hoffman to Dorothy Attwood, Chief, Common Carrier Bureau, regarding the NANC declining to make recommendations to the Commission on whether to restructure the ownership and operation of the current system of toll free number administration
- (24) January 16-17, 2001 Meeting Minutes (Draft)
- (25) NANC Federal Advisory Committee Directory
- (26) Table of NANC projects/activities to be addressed in the next six to twelve months (as of March 21, 2001)
- (27) March 2001 NBANC Status Report to the NANC
- (28) CIC IMG Status Report
- (29) Procedures IMG

Summary of the Meeting.

A. North American Numbering Plan Administration (NANPA) Report. John Manning, NANPA, provided the report to the Council.

<u>Standardized Reports</u>. Mr. Manning reported that NANPA and the states have agreed to move forward with three standard reports. The reports are posted on the NANPA web site. There is an understanding between NANPA and the states that this is an evolving process. NANPA will take additional ideas, suggestions, thoughts, and enhancements offered by the states under advisement as the states continue to get information and begin to work with the reports.

Mr. Manning reported on the issue of unavailable central office (CO) codes. NANPA is putting together a list of all unavailable codes in each geographic NPA. That information will be provided to NANPA's NPA relief planners. The NPA relief planners will spearhead an effort to work with the local exchange carrier and the former central office code administrators to determine the final disposition of the particular CO codes that are listed in the database as unavailable. The same list of codes will be provided to NANPA's NRUF group who will examine the utilization data that was reported in the February 1 NRUF submission cycle to see if any carriers are reporting usage of these codes. NANPA will then be able to determine whether these CO codes can immediately be changed from unavailable and be made available for assignment. If a determination cannot be made as to the status of a CO code, NANPA will solicit input from state commissions as to whether to reclaim them. Over the next 30 days, the NPA relief planners will be contacting the former CO code administrators, requesting a reply within 30 days. At the end of April, NANPA will have a better idea of the number of codes that can be recovered. NANPA intends to post a weekly report on the web site that will provide a more defined status of each CO code within each NPA.

<u>CO Code Activity</u> – Mr. Manning provided an update on the CO code activity for the period April 2000 through January 2001. Mr. Manning noted that assignments from April 2000 through January 2001 as compared to April 1999 through January 2000 shows

that the number of net assignments are down by approximately 250 CO code assignments. There is approximately a difference of 500 between the 1318 net assignments in the period 1999 through 2000 and 814 in the period 2000 through 2001. In January 2001, the number of disconnects (CO codes being returned) was 789, which was significantly higher than any previous month. The lottery denial and lottery priority columns were eliminated as of January 2001. The lottery denials are now included in the denials column. If a CO code goes in lottery priority, the disposition of that CO code will be shown when it is either assigned or denied.

Rose Travers, USTA, noted that since the removal of the "lottery denial" and "lottery priority" columns, the denials column has spiked back up. She questioned whether there is anything making the figure higher other than the inclusion of lottery denials in the data. Mr. Manning advised that the process is designed to help ensure that the CO code administrators apply the guidelines consistently in response to some comments received from the industry. As a result of doing this, some of the suspensions may go down, but the denials may go up. The idea is that every code administrator will be doing basically the same thing.

Jack Goldberg, NARUC, requested information on the CO codes companies are returning and the CO codes that are being reclaimed. Mr. Manning advised that this information is available in the 2001 Monthly Report on the NANPA web site. The report shows the number of CO codes that have been returned, but does not have information on which carriers returned them.

<u>NPA Relief Planning</u>. Mr. Manning reported, in response to a request by Verizon at the February NANC meeting for information on NPA relief activity, that the NANPA web site has a new matrix that summarizes the status of NPA relief. Verizon provided a template of information that it thought would be useful. Mr. Manning explained that NANPA will continue to work on the matrix, and a final version will be placed on the NANC Chair web page. NANPA will update the information periodically and provide it to the NANC. The matrix includes information on the status of the NPA relief and implementation processes.

500 NRUF Action Item. Mr. Manning reviewed the action items given to NANPA at the February NANC meeting on utilization and forecast reporting for 500 and 900 numbering resources. NANC requested that NANPA summarize the INC PCS N00 NXX Code Assignment Guidelines. Mr. Manning provided excerpts from the PCS N00 NXX Guidelines, specifically Section 1.1 and a copy of a Part A application form that is used to request a 500 resource. Mr. Manning was asked to work with Peter Guggina to define what issues the NANC needed to address concerning the 500 resource. They outlined some issues that the NANC may wish to consider. In response to the third action item, Mr. Manning outlined what NANPA thought it would have to do to the NRUF 502 form, the NRUF job aid, the PCS N00 NXX Assignment Guidelines, and the NANP NRUF Reporting Guidelines to accommodate NRUF reporting for 500 and 900 resources.

Chuck Eppert, Verizon, suggested that it would be best to modify Form 502 and inquired as to the process for getting the modified form approved.

Chairman Hoffman advised that modifying the form is something that should not be undertaken lightly. He stated that it would be best to understand the problem. Then, NANC can propose a solution before deciding whether or not the reporting is the best approach to solve the problem. Chairman Hoffman noted that one of the questions put to Mr. Manning last month was whether you can get what you need in the current reporting without changing the form.

Peter Guggina suggested that NANC should identify the problem with 500/900 resources before NRUF reporting is required. Mr. Guggina noted that NANPA sent a letter to the code holders in November 2000, which prompted WorldCom to return 500 codes that it was not using to provide service. One of the criteria in the INC guidelines for assignment of the 500/900 codes is that the carrier must provide a service description.

Ms. Travers stated that if the Commission intends to monitor SAC codes in general (including 800 numbers), perhaps, it would be appropriate to have a new form because the current form is targeted to geographic codes. Beth Kistner, ALTS, stated that she agrees that there needs to be more information gathered about current 500 usage before looking at NRUF reporting. Ms. Kistner questioned whether NANC should have a role in looking into modifying the NRUF for 500 reporting.

Chairman Hoffman stated that when the FCC asks NANPA for information, NANPA has to respond. He further stated that the issue for the NANC is whether there is a policy issue for NANC to address and advise the FCC or leave it to the FCC and NANPA to resolve. He questioned whether the NANC should be concerned with the fact that the numbers are being used for things other than what is in the service description. Ms. Kistner stated that she does not think that NANC has been asked for any kind of input from the FCC on this issue.

Mr. Guggina questioned whether 500/900 resources are being used for the purpose intended and inquired as to what will happen when the 500 resource exhausts.

Norman Epstein, INC Moderator, explained that when the code for 500 service was first established, there was a big run on these numbers. INC advised Bellcore, the NANP administrator at the time, about the potential for exhaust, and Bellcore assigned the 522, 533, and 544 numbers for future growth.

Ron Havens, Sprint, explained that Sprint was one of the first companies to market 500 numbers, but the market did not respond to the calling party-pays types of services offered. Mr. Havens stated that another aspect that the NANC needs to consider is not only what the carriers are doing with this, but how the marketplace as a whole is responding to the numbering resource.

David Bench, Nortel Networks, reported that ICCF developed the assignment guidelines for 500 numbers, and carriers later found out that there was no practical way of making them work. Ms. Kistner, ALTS, reminded the group that they are only discussing 500 numbers and that this was about 500 and 900 numbers. Ms. Kistner advised that the NANC should keep in mind that this is an issue with the possibility of NRUF reporting for 900 numbers also. She stated that she is still not clear about just what question is posed to NANC. The FCC asked NANPA to look into extending NRUF to include 500 and 900. Ms. Kistner suggested that the NANC submit a letter to the FCC informing them that the NANC is aware of this issue that numerous fundamental questions have been discussed, and that prior to the establishment of any reporting that the NANC have the opportunity to advise the Commission. She suggested that the letter should also request a response from the FCC as to whether the NANC should proceed.

NANC continued extensive discussion on issues surrounding the use of 500 numbers, their viability, and NRUF reporting. Chairman Hoffman noted that the FCC has asked NANPA for some data and to get it in the form of NRUF by the middle of this year. He questioned whether there are any policy issues that the NANC should be concerned with addressing, or whether the NANC should wait for direction from the FCC.

Lori Messing, CTIA, stated that she is still not convinced that the NANC has a role in this issue until more information is received from the NANPA. The NANPA is merely presenting this to the NANC as an information piece.

Randy Sanders, Bell South, questioned whether it is possible that some of these numbers are being used by non-carriers, and if they are required to submit an NRUF.

Mr. Manning advised that they would follow the same guidelines that are used in the present NRUF if the 500 numbers are assigned from one carrier to another carrier. The receiving carrier would be required to report. If the 500 numbers are given to a non-carrier, then it would be the responsibility of the carrier providing the numbers to the non-carrier to report.

Mr. Bench, Nortel Networks, noted that it is possible that there are people using 500 numbers that are not assigned by NANPA since they are not routable and not billable.

Chairman Hoffman asked Ms. Kistner to draft a letter on 500/900 Utilization Reporting for the NANC to review and then decide whether or not to send the letter to the FCC. The Council reviewed the draft letter. After extensive discussion, a consensus was reached that a letter should not be sent.

B. NeuStar Neutrality Audit. John Manning provided the report to the NANC. Ms. Meisenheimer questioned whether there is a process by which states that are facing potential area code relief can request that NANPA review its exhaust projections. Mr. Manning explained that NANPA has received numerous requests to update its NPA exhaust projections during the NPA relief planning process, especially when certain

events are taking place. He advised that NANPA has made such updates in the past and will continue to do so on a case-by-case basis as circumstances warrant it.

C. NANPA Oversight Working Group (NOWG) Report. Pat Caldwell, Chair, presented the report to the Council. Mr. Caldwell reported that the NOWG is receiving responses to the 2000 NANPA Performance Review survey. To date, 27 survey responses have been received, including 5 responses from state commissions. This time last year, 42 survey responses had been received from service providers and 15 from state commissions. Mr. Caldwell advised that the next step is to analyze the results of the surveys and document the 2000 operational review. A final report is expected in May. Mr. Guggina inquired as to whether the survey submissions were from different entities or whether some were from the same entities. Mr. Caldwell advised that some were from the same entities, explaining that approximately 15 different entities responded. Mr. Guggina expressed concern that one company can send in multiple responses. Mr. Caldwell explained that the number of responses do not skew the results because the NOWG analysis is not based on a numerical score but is based on the comments received.

NANPA Technical Requirements Document. Mr. Caldwell reviewed the schedule for completing the NANPA technical requirements for the next NANPA contract. He reported that the NOWG missed its January 19, 2001 target date for drafting an initial baseline document, but recently completed it. Mr. Caldwell advised that the NOWG recommends that the deadline for presenting the final report to the NANC be extended to September 2001 in order to improve the quality of the document. A new detailed schedule will be provided next month. The Council agreed to extend the deadline for the NANPA technical requirements report to September 2001. Mr. Caldwell advised that the Will be approximately a one month delay in issuing the initial draft to the Legal Working Group.

<u>NANPA Performance Escalation Process.</u> Mr. Caldwell reviewed the NANPA Performance Escalation Process proposed by the NOWG. The process is intended to address performance improvement issues outside of the annual NNAPA performance review process. Mr. Caldwell reported that the NOWG intends to review issues raised about performance improvement. The NOWG will track all issues raised and make the information available to NANC.

D. Numbering Resource Optimization (NRO) Working Group (WG) Report. Eleanor Willis-Camara, Co-Chair, provided the report to the Council. Ms. Willis-Camara reported that the NRO WG is working with NANPA to refine the NANP exhaust assumptions. The NRO WG expects to finalize the assumptions in time for NANPA to produce its report on NANP exhaust in May. Ms. Willis-Camara asked the NANC members whether they are getting any value from the pooling reports. The NANC members agreed that the pooling trial matrices may no longer be useful in their current form. Chairman Hoffman suggested that the NRO WG provide the pooling report on an as needed basis. Gilbert Orozco, SBC, inquired about the schedule for national pooling and suggested that some of the issues that the NRO WG is dealing with regarding pooling trials may become moot. Ms. Callahan, DFO, advised that selection of the national pooling administrator is targeted for the end of the first quarter.

E. Industry Numbering Committee (INC) Report. Norman Epstein, INC Moderator, presented the report to the Council. Mr. Epstein advised that the INC intends to update the INC CO/NXX and Pooling guidelines to make them consistent with the December Commission order. Mr. Epstein noted that at the last full INC meeting some state regulators participated, and he invited increased participation by state regulators. Mr. Epstein reported that the CO/NXX Workshop agreed to develop potential national imminent exhaust procedures that would include emergency requests for central office codes.

<u>Facilities Readiness Determination.</u> Mr. Epstein explained that the letter to Yog Varma from INC regarding initial code/block application facility readiness and license certification requirements under FCC 00-104 is not intended to usurp the authority that has been delegated to state commissions. It is intended to expand the list of examples provided in the FCC NRO Order 00-104 to demonstrate facility readiness and clarify the proof needed to meet proof of license requirements.

Mr. Guggina questioned whether the change in certification and facility readiness requirement would increase the costs to NANPA. Mr. Epstein explained that the majority of INC participants felt that the expanded list of examples and certification process would reduce NANPA's work. Ms. Kistner questioned whether the preplanning checklist is a standard form that all carriers use. Mr. Epstein explained that the form was created by the INC and would be inserted in the guidelines. Thomas Dunleavy, NARUC, stated that the INC Guidelines should clearly state that the state commissions can require different documentation to meet the facilities readiness criteria.

Courtney Jackson, OUR, suggested that there is a connection between this issue and CIC assignments because there is a need for a CIC to be entered in the proposed form. He further stated that in OUR administration there is a need for ensuring that the resellers are properly licensed. Therefore, controlling the issuing of the CIC, is a way of ensuring that you do not have resellers operating without a license. He questioned whether this initial allocation of codes could be OUR issuing CICs to carriers. Mr. Epstein advised that the CIC is listed on the form as CLEC information, and it says local CIC. He reminded the NANC members that the requirement is intended to produce proof that a company has facilities. It is not a non-facility type request for numbers.

F. Toll Free IMG Report. Ron Havens, Chair, presented the report to the Council. Mr. Havens reported that the IMG assignment was based on paragraph 28 of the December 2000 NRO Order which asks whether the selection of the toll-free administrator should be through a competitive bidding process. Mr. Havens reminded the NANC members that the IMG has not been able to reach a consensus. Mr. Havens noted that a problem encountered was the fact that some companies chose to send policy people to the IMG meeting but not Toll Free SMEs, when SMEs were really what was needed. The IMG put aside the competitive bid issue, and continued to work on the technical requirements document. Chairman Hoffman indicated that it unlikely that a consensus will be reached

at the NANC level, but wanted to discuss the issues one more time before reporting to the FCC that there is no consensus.

<u>Competitive Bid.</u> Chairman Hoffman asked the Council whether anybody wanted to argue for or against competitive bidding of the SMS/800 administrator. Mr. Guggina suggested that the question should be explored on all of the issues, including competitive bid and tariff structure. Chairman Hoffman stated that if the NANC has to report to the FCC that they were unable to reach a consensus on competitive bidding, that the NANC should give the FCC an explanation as to why NANC could not reach consensus. An extensive discussion ensued on whether there is a problem with the current SMS/800 Administration is satisfactory and should not be changed, while other members suggested that there are problems with the current arrangement that require change.

Chairman Hoffman explained that he was allowing extensive discussion on the competitive bid issue because the fundamental divide between the current system administrators and end users is going to permeate every issue that is going to come up for decision on this. Chairman Hoffman stated that he will draft a letter to the Commission advising that NANC was unable to reach a consensus on the competitive bid issue because of the fundamental differences in opinions between these two groups.

Overview of Current System. Ben Schneider, Telcordia Technologies, provided a brief overview of the current system to the Council. Mr. Schneider explained that Telcordia does not operate the service, it provides the software. He reported that the number administration and customer record administration is the bulk of the functionality that is most used. Number administration is the processing that allows carriers to reserve and administer numbers for customers. Customer record administration allows carriers to define the service that is actually downloaded into the network to provide the call processing. Mr. Schneider reported that Telcordia provides security on both access and data. If there is a problem with a specific number, carriers can access the system to find out who to contact. If there are some network management controls, carriers can set the system records and allow the system to control the access to the SCPs. Mr. Schneider reported that the system has full reporting capabilities such as call sampling if you have an interest in the calls that a specific toll free number has received over a period of time. He noted that there is a full range of mass change capabilities, NPA splits as well as billing support and disaster recovery. Mr. Schneider reported on the specific things that can be done with 800 number administration. He further explained that once a carrier reserves a number, a number is allocated for a particular customer. To define the service for that customer, the carrier would have to build a customer record. Every customer record has the customer's administrative data. The call processing record is where the carrier defines the complex routing capabilities. Mr. Schneider reported on the SMS/800 usage statistics and system statistics. He noted that there has not been an outage due to the SMS/800 software application.

Structure and Tariff. The Council proceeded with an extensive discussion on structure and tariff issues. Chairman Hoffman noted that the NANC excused the IMG from addressing the structure and tariff issues since they were unable to reach a consensus. NANC agreed to attempt to address the issues instead. Chairman Hoffman explained that from a structure standpoint, there are two entities. There is the system itself, computer software that performs the function of updating the records, receiving the inquiries, directing the calls, and routing the calls, which is the mechanics of what is done in the 800 data base. Then there is the administration structure, separate from the system, which is the SMT companies or bell company partners and everything that is associated with that. DMSI is part of that. Chairman Hoffman suggested that one of the issues is whether it is possible to recommend that the administrative structure be let out for competition before the system component is put out for bid. He noted that some carriers, that are not represented on the NANC, have expressed concern that the computer program has become such an integral part of the system that it should not be changed right away. If a mistake is made, and the system fails, it affects service nationwide. The Council members were unable to reach consensus on the structure.

Chairman Hoffman explained that the tariff issue is whether or not the cost of the system should be recovered from the people that use the system by a tariff charge. He questioned the IMG as to why the IMG was unable to reach a consensus on the tariff issue. Mr. Havens reported that the IMG was unable to get to this issue because of the time spent attempting to reach consensus on the other issues. After an extensive discussion, NANC was unable to reach a consensus on the tariff issue.

<u>Technical Requirements.</u> Mr. Havens advised that the Technical Requirements Document is not a consensus document but represents how the current system works. Pat Caldwell, Bell South, explained that the document is the current system plus anything that could be agreed upon as a new feature or functionality to the current system. Trent Boaldin, OPASTCO, expressed concern about sending an incomplete work product to the Commission. The NANC agreed to send a letter to the FCC advising that the NANC does not have any recommendations to the Commission on whether to restructure the ownership and operation of the current system of toll free number administration.

G. Local Number Portability Administration (LNPA) Working Group (WG) Report.

<u>Wireless Number Portability Subcommittee (WNPSC) Update.</u> Anne Cummins, Co-Chair, reported that Wireless Number Portability Operations (WNPO) team has been formed as a subcommittee of the Wireless Number Portability Subcommittee. Ms. Cummins reported that wireless carriers are twenty months away from implementing LNP. The WNPO subcommittee was established in February to address wireless number portability operational issues. Ms. Cummins advised that due to the nature of the wireless business model, Sunday porting is important to wireless carriers. To accommodate Sunday porting, the WNPO is examining operation of NPAC timers on Sunday. A new Change Order is required to accommodate the "long business days" (used by wireless service providers) in order for the timers to work on Sunday. Ms. Cummins reported that currently, carriers do not do any porting on Sunday. The maintenance windows start at 6:00 AM on Sunday, which would overlap into the wireless Sunday busy hours. Ms. Cummins stated the WNPO team is exploring the possibility of moving the maintenance hours to start at midnight on Sunday so that the maintenance can be done before the busy porting hours begin.

Mr. Gould stated that all of the carriers would have to be available on Sundays to accomplish these ports. Ms. Cummins disagreed and suggested that this scenario involves wireless to wireless porting. She recognized that a slightly different model must be used when there is wireline-wireless porting. Ms. Cummins stated that wireless busy hours begin at 11:00 AM Central time to 10:00 PM Central, which covers all of the time zones throughout the United States. Ms. Cummins discussed the limitations of porting, the disposition of Type 1 numbers, and the impact of Wireless Number Portability on wireless resellers. Ms. Cummins suggested that current LRN assignment guidelines were written primarily for wireline service providers and may need to be updated to accommodate wireless service providers. Wireless service providers were asked to review the current guidelines and submit any contributions to modify the guidelines at the April NANC meeting.

Ms. Cummins reported that there are now two co-chairs for the Testing Sub-committee. She noted that the two co-chairs, Jennifer Chartraw, AT&T Wireless, and Mark Wood, Cingular Wireless, will be the national coordinators for service provider to service provider testing. The co-chairs has requested that each company identify a testing coordinator prior to the next meeting or send a temporary coordinator. Each company is to review the Inter-Carrier Test Plan and provide comments and issues at the next meeting.

<u>LNPA Working Group Status Report.</u> Charles Ryburn, LNPA Co-Chair, presented the report. Mr. Ryburn reported on the status of NPAC/SMS Release 4.0. The North American Portability (NAPM), LLC rejected SOW 26 for NPAC release 4.0 in its February meeting. It was decided that the business needs of the release were not justified by the cost. Mr. Ryburn reported that negotiations are expected to continue.

The LNPA Working Group is working on change order requirements that will become part of a "pool" of changes that will be negotiated for future releases. NeuStar, the LNPA Working Group and the NAPM, LLC are currently reviewing the SOW process to improve the process for future software releases.

<u>Problem Identification Management (PIM)</u>. Mr. Ryburn provided an update on the open PIMs.

PIM 1 – Multi-Service Provider (Reseller) Flows: NNPO will hold its first meeting for this issue on Tuesday, March 20. NNPO will be working to try to resolve whether Option A, where the reseller sends all necessary LSRs, is viable.

PIM 5 – Inadvertent Porting: The LNPA submitted an amended request to NeuStar for a new SOW regarding PIM 5. At the request of the NAPM, LLC, a scenario was added to reflect situations where a port was supposed to occur but did not. The LNPA reviewed NIIF 134 as requested by the NANC. A letter was sent to the NIIF moderator requesting additional clarification to NIIF to better identify the need for 24X7 coverage by LNP participants.

Natalie Billingsley, NASUCA, questioned whether the LNPA is addressing the problem of service providers refusing to port when a customer wants to port. Mr. Ryburn reported that the problem has not been reported through the PIM process. Thomas Dunleavy, NARUC, questioned whether the 24x7 coverage will guarantee that customers' whose numbers were ported to another carrier in error will be restored promptly and how promptly. Mr. Ryburn reported that in most cases, a contact person can be reached at the other service provider. Although, in some instances, the person has no knowledge of local number portability nor has the authority to initiate the process to port the customer back. Ms. Billingsley questioned whether the additional language to the NIIF will ensure that a customer's long distance PIC freeze is not affected when correcting an inadvertent port. Mr. Ryburn advised that that should not be an issue.

PIM 6 – NENA request for standard on unlock-migrate transactions during porting. NENA and OBF met by conference call and discussed why the mandatory EUMI is required. NENA expects OBFs response in the near future.

PIM 9 – USLEC has explained that some carriers will not accept third party trouble tickets, or do not understand the LNP aspect of the report when the trouble ticket was accepted. This PIM has been referred to the NIIF for resolution.

PIM 10 – End-User Billing based on LRN rather than called telephone number. USLEC explained ported customers sometimes receive a telephone call from a next door neighbor and the next door neighbor is billed for long distance charges. In those instances, it is the NPA-NXX of the LRN that is getting associated with the dialed number rather than the NPA-NXX of the dialed number. An incorrect switch translation causes this problem. Each LNP member will investigate internally to make sure switch translations are correct. Mr. Ryburn reported that all three co-chairs of the LNPA working group will be resigning.

H. Cost Recovery Working Group (CRWG). Anne La Lena reported that she has nothing to add to the draft Billing and Collection Requirements document. Chairman Hoffman gave approval to finalize the document presented at the February NANC meeting.

I. "Big Picture" Discussion. <u>NANC Number Conservation – Ad Hoc Charge.</u> Ed Gould, AT&T, presented the report to the Council. Consistent with the assignment that was defined at the February 21, 2001 NANC meeting, an IMG should be formed, the scope of the proposed IMG's assignment, and the projected time and potential budget to complete the assignment. The group agrees a new IMG should be formed to evaluate the

additional Number Optimization Techniques, evaluate NANP expansion, analyze which measures provide the greatest benefit, and develop direction.

Chairman Hoffman suggested that the NRO makes more sense that an IMG because the working group stays in effect and has been working on it for a while. Peter Guggina, Worldcom, stated that an IMG can do the same thing in a more focused way. Mr. Guggina recommended Ed Gould become the Chair of a newly formed IMG. Mr. Gould stated that those in the group who wanted one group really cared and were serious. Trent Boaldin, OPASTCO, agreed with Mr. Gould and Mr. Guggina. He stated that the first task that of the IMG should be to develop a work plan. Others agreed that a new IMG should be formed. Chuck Eppert, Verizon, recommended Rose Traver as Ed Gould's Cochair. Randy Sanders, Bell South, stated that the IMG should include subject matter experts as well as policy people. Chairman Hoffman stated that the NANC is clearly in agreement on an IMG.

Wednesday, March 21, 2001

J. Approval of Meeting Minutes. The minutes of the January 20-21, 2001 meeting were approved subject to minor edits submitted during the meeting.

K. Steering Group Report. Rose Travers, USTA, provided an update on the Table of NANC Projects. Changes to the Table of Projects were noted in bold. Mr. Travers advised that a new item has been added – NANP Expansion/NANP Optimization IMG to develop analysis of cost/benefits of number optimization measures against NANP expansion considerations. The estimated timeframe for completion is March 2002. Five items were moved to the list of completed NANC Projects and Activities.

<u>NBANC Status Report to the NANC.</u> John Ricker, NBANC, presented the report to the Council. Mr. Ricker reviewed the Monthly Status Report. He noted that there are about 308 companies and 11 countries that have not fulfilled their obligation for year three. Mr. Ricker reviewed the open issues related to the year three balance of \$1.3M, which includes payments to Mitre Corporation for consulting on the thousand block pool administrator, and the request from NANPA for additional funding. Mr. Ricker also reported on the process used to bill the member nations outside of the United States for their share of number administration responsibility.

Mr. Orozco, inquired as to whether the fund balance includes national pooling costs based upon the projection that was developed approximately one year ago. Mr. Ricker responded yes. Ms. La Lena pointed out that there is a projected \$1.1 M cushion at the end of year three. Mr. Eppert, questioned whether the \$3.85 million pooling administration will be reduced by 25% since no money was spent this quarter. Mr. Eppert requested an estimate of expenditures for 2001. Chairman Hoffman responded the pooling costs are not known at this time. He explained that the Commission expects to award the pooling administration contract before the end of March. When the award if made, the Commission will choose a bid that has a dollar figure on it, and the cost will be known at that time. Gilbert Orozco, questioned the \$353,000 paid to Mitre for consulting

work on Pooling. Mr. Ricker responded that he assumes the Commission got what they paid for. Mr. Eppert, questioned whether NANC has some oversight role to play. He further stated that NANC should already know the pooling costs since they are administering this money and are responsible for it. Chairman Hoffman explained that NBANC develops an allocation factor and bills carriers according to that allocation factor as approved by the FCC once a year. When NBANC requests an adjustment in the allocation factor, the NANC reviews it and makes a recommendation to the FCC. The FCC makes the decision. Cheryl Callahan, DFO, explained that when the NANC made the recommendations to the FCC about what amount would be used for pooling and for the COCUS Replacement, there were many unknown factors at that time. Ms. Callahan stated that even to this point, there are things that are not known in terms of what the actual costs will be. For obvious reasons, the amount that has been set aside at the recommendation of the NANC has not changed. Ms. Callahan advised that at the end of this whole pooling process, there will be a contract. She reported that the Commission has decided to use the government contracting process. She further reported that the FCC is leaving the status quo until such time as they know the cost, and how things will ultimately turn out. She indicated that if there is a need to adjust the contribution factor, as a result of that, it will be done.

Harold Salters, PCIA, questioned what is the relationship between Mitre Tech and Mitre. Ms. Callahan, responded none. Mr. Orozco explained that he was not questioning the process of the FCC to use funds, he was simply asking what Mitre had done that entitled them to \$353,000. Chairman Hoffman advised that Mitre help put together the bid package. Cheryl Callahan advised that Mitre is consulting the FCC on pooling and other numbering issues. Ms. Callahan stated that she can not and will not discuss anything that has to do with the bidding contract.

Peter Guggina, Worldcom, stated that Mitre has done a lot of work, and that type of work does not come cheap. He further stated that he does not think that it is a problem. Mr. Guggina asked for clarification regarding the FCC rules on contracts. Ms. Callahan stated that in the Order, the Commission made it very clear what it intended to happen with respect to the pooling administration contract. Mr. Eppert questioned Ms. La Lena as to whether she has any voice in how money is spent, i.e., consultation with Mitre as a board member. Ms. La Lena explained that the NBANC Board of Directors was formed to oversee NBANC staff. She advised that NBANC's role is extremely mechanical administrative rather than policy. Chairman Hoffman explained that the allocation factor that NBANC uses to bill the carriers came from the NANC. The NBANC bills carriers and then spends the money according to direction from the FCC.

L. Carrier Identification Code (CIC) IMG Report. Karen Mulberry, Worldcom, presented the report to the NANC. Ms. Mulberry asked the Council to review the CIC IMG Report to the NANC and provide any comments to Bill Adair by e-mail or telephone by April 2, 2001. The IMG plans to present a final draft to the NANC at the April NANC meeting. The final document is due to the FCC in August 2001.

M. NAPM LLC Report. Michael O'Connor, Co-Chair, presented the report. Mr. O'Connor advised that Release 3.0 arrived last weekend in the Northeast. He further advised that it was successfully implemented over the weekend and is now up and running in that region. Mr. O'Connor provided an update on the schedule that was reported at the last NANC meeting and modified at the last NAPM and LLC meeting. Mr. O'Connor stated that, the Northeast is up and running as of March 19. There is a two-week wait period for the next region, which is the Western Region. Release 3.0 will be implemented on April 9 in the West Coast Region. There is a two-week hiatus to accommodate Easter with the Mid-Atlantic now scheduled for April 23. The Southeast Region is scheduled for April 30, and the Southwest Region for May 7. There will be a two-week hiatus to accommodate Mother's Day weekend. The Mid-West Region will be in place on May 21.

N. Meeting Procedures IMG. Peter Guggina, Worldcom, provided the report to the Council. Mr. Guggina advised that the IMG developed procedures using the procedures that were developed for the working groups. He further advised that they expanded the procedures to include a section that provides information on the Responsibilities of the Chair, Voting Members, NANC Steering Group, Working Groups, IMGs, Principles for Consensus, Lack of Consensus, Minority Opinions, Responsibilities of Presenters, and the Communications and Administrative Processes. Mr. Guggina suggested that a sentence be added under Communication and Administrative Processes to cover the fact that they would like the working group Chairs to provide the DFO, the ADFO, and the NASUCA/NARUC representative with a copy of their reports when they send it to John Manning to post on the web. He further advised that the procedures document provides a road map that allows the participants to know how NANC conducts business. Mr. Guggina received comments from NANC members that resulted in some changes and additions to the report. Mr. Guggina will include any changes and send the document to NANPA for posting on the NANC Chair web site.

Other Business. None.

Next Meeting. April 17-18, 2001

Action Items and Decisions Reached:

- 1. <u>North American Numbering Plan Administrator (NANPA) Report</u>. NANPA will identify the NPAs in rationing in the matrix "Status of Area Code Relief Exhausting Within 36 Months."
- 2. <u>Report of the Toll Free Access Codes IMG</u>. Chairman Hoffman is to send a letter to the FCC advising that the NANC was unable to reach a consensus on 800/toll free issues, including a technical requirements document.
- 3. <u>Report of the Cost Recovery Working Group</u>

The CRWG recommendation for billing and collection was accepted. The CRWG will draft a cover letter and forward the recommendation to the Commission.

4. <u>Report of the "Big Picture" Ad Hoc Group</u>

The NANP Expansion NANP Optimization (NENO) Issue Management Group was formed to develop a work plan for presentation at the April NANC meeting recommending the path forward for the "Big Picture" activity. The group will be led by three co-chairs:

Ed Gould – AT&T NARUC – member to be identified Rose Travers - USTA

5. Reseller CIC IMG Status Report

Working from the draft report presented to the NANC on March 21, 2001, all interested parties should forward comments to Bill Adair by April 2. A final IMG report, incorporating the additional inputs, will be presented to the NANC at the April meeting.

6. Meeting Procedures IMG

Detailed modifications made to the document will be incorporated by Peter Guggina and posted on the Chair website.

Chairs of Working Groups should direct an email message to their operating members to notify them of the procedures and remind them of the need to forward reports to the FCC as well as the NANC Chair website. Copies of reports should also be forwarded to the NARUC/NASUCA contact, Natalie Billingsley.