North American Numbering Council
Meeting Minutes
June 23-24, 1998

I. Time, Date and Place of Meeting: The North American Numbering Council held a meeting, commencing at 8:30 a.m., at the Federal Communications Commission, 1919 M Street, NW, Room 856, Washington, DC.

II. List of Attendees:

A. Council Members

Voting Members	Organization
1. Emily Williams	ALTS
2. Dave Konczal	American Mobile Satellite
3. Woody Kerkeslager	AT&T
4. Dan Hochvert/Jim Castagna	Bell Atlantic
5. Roger Werth	Cincinnati Bell
6. Ronald Binz	Competition Policy Institute
7. Brian Fontes/Robert F. Roche	CTIA
8. Alan Hasselwander	Frontier
9. Ted Noeker	GTE
10. Peter Guggina	MCI
11. Gerry P. Thompson	Mobility Canada
12. Vincent Majkowski	NARUC
13. JoAnne Sanford	NARUC
14. Beth O'Donnell	NCTA
15. Dan Gonzalez	Nextlink
16. Larry Krevor	Nextel Communications, Inc.
17. Joe Kingrey	Nortel
18. Anna Miller	Omnipoint
19. Trent Boaldin	OPASTCO
20. Mark Golden/Cathy Handley	PCIA
21. Mike Bennett	SBC Communications, Inc.
22. Rikke Davis	Sprint Corp
23. Diane Little	Sprint SpectrumPCS
24. Richard Leroux	Stentor Resource Center
25. Ed Gould	Teleport
26. Dan Bart/Gerry Rosenblatt	TIA
27. Paul Hart	USTA

Special Members (non-voting):
John Manning   ATIS
Ron Conners   NANPA

B. Commission Employees

Erin Duffy, Alternate Designated Federal Official
Geraldine A. Matise, Chief, Network Services Division (NSD), CCB
Anna Gomez, NSD, CCB
Kris Monteith, NSD, CCB
Jeannie Grimes, NSD, CCB
Les Selzer, NSD, CCB
Gayle Radley Teicher, NSD, CCB
Michael Rosenthal, Wireless Bureau

III. Estimated Public Attendance: Approximately 38 members of the public attended the meeting as observers.

IV. Documents Introduced: Each member received the following handouts:
      (1) Agenda
      (2) LNPA Working Group Report
      (3) Lockheed Martin, NPAC Report on National Number Pooling (EDR & POD Issues)
      (4) Wireline Wireless Integration Task Force Report
      (5) Abbreviated Dialing Working Group Report
      (6) Industry Numbering Committee Report
      (7) Numbering Resource Optimization Working Group Report
      (8) Cost Recovery Working Group Report
      (9) Bellcore Number Pooling Presentation
      (10) Lockheed Martin, 1000s Number Block Administration Recommendation

V. Summary of the Meeting:

A. *Welcoming Remarks* -- **Alan Hasselwander.** Chairman Hasselwander reported that the Common Carrier Bureau had released public notices and set comment cycles on NANC's High Volume Call-In Network Report and on the Data Service Management, Inc. (DSMI) neutrality recommendation.

B. *LNPA Working Group Report -- Bonnie Baca*, Co-chair, T&O Task Force. Ms. Baca reviewed 1000 block pooling concepts. Ms. Baca stated that industry inventory pools provide blocks of 1000 numbers for allocation to service providers (SP). Numbers are provided for use in a specific geographic area, currently only within a rate center. Upon a SP's request for numbers, the pool administrator assigns 1000s blocks to the SP's inventory from the industry pool pursuant to industry guidelines and the SP's need for numbers within the rate center. Service providers place the numbers in the NPAC/SMS (LNP database) by using one of following two methods: (1) Pre-Port (PP), which places all numbers within the block into the NPAC/SMS upon allocation; and (2) Port on Demand (POD), which puts a number into the NPAC/SMS only when it is assigned to a subscriber. See handout for additional detail and characteristics for both architectures, PP and POD.

Ms. Baca stated that pooling results in added records to be stored in network databases, which in turn causes concern for capacity. The use of Efficient Data Representation (EDR), a single database record representing a block of TNs, rather than an individual TN record, minimizes

storage requirements and reduces concern for network capacity. The INC recommended a target architecture which included both POD and PP and also recommended EDR to reduce network capacity concerns.

Ms. Baca reported that the Task Force has reached a disagreement over whether to concurrently develop POD and EDR. That disagreement has slowed progress within the Task Force. Accordingly, the Task Force requested further guidance from the Council before it undertakes any development of requirements for POD.

LM Contribution on National Pooling. Mark Foster, NPAC, provided a response to industry questions on efficiency and capacity differences between PP and POD. He also provided a brief tutorial on national pooling POD and EDR and the industry's SCP capacity concerns. Mr. Foster stated that some SPs want the benefit of both POD and EDR and the question has been raised as to whether there is "a block size where EDR becomes efficient?"

Chairman Hasselwander asked what the efficiency is in dollar terms for EDR and what it achieves in the network element. Mr. Hasselwander commented that although the INC target architecture recommended both PP and POD, there is a lack of industry knowledge on the requirements of each. Chairman Hasselwander stated that industry needs to develop requirements and send those requirements to LM for price quotes. Mr. Foster added that the EDR concept and POD are the ultimate means of limiting network requirements. Nonetheless, LM needs to perform an assessment. He stated that, on paper, EDR appears to have certain efficiencies. With POD, however, if TNs are ported, as needed, it is not clear if EDR is still applicable. Mr. Foster further remarked that even without EDR, the POD lifetime of a block delivers storage record efficiency. According to Mr. Foster both strategies are designed to minimize downstream network impact.

Ms. Baca added that a liaison was sent to T1S1.6 with regard to efficiency. The vendor declined, however, to give a level of loss of efficiency. The T&O reached unanimous agreement to support development of EDR for 1000 block pooling. The T&O will focus exclusively on PP and EDR requirements. The T&O believes that this is an architecture that is both supported by the industry and less complex. Moreover, it will allow for maximum use of pooling design and is currently under development for the Midwest trial. During the June 22-25 T&O Task Force meeting in San Francisco, the T&O will develop, as quickly as possible, requirements for PP and EDR and will send them to LM for cost/pricing. The T&O will seek further direction from NANC before it undertakes any development of requirements for POD. Ms. Baca also reported that, currently, two companies, US WEST and Bell Atlantic, are developing EDR and POD, and that they intend to use both.

A concern was raised that the Council is making a decision without the benefit of knowing the costs involved. Ms. Baca pointed out that costs cannot be obtained without the development of requirements. Also, before the development of cost estimates by LM, the LLCs require a statement of work. Ms. Baca reported that the Task Force would first develop and submit a request to LM for the costs of PP and EDR; thereafter, it would send a request for POD. If both PP and EDR are used, then all NPACs must be able to accommodate both architectures.

Mr. Foster stated that development is currently underway for Release 1.4, to support the Illinois number pooling trial, which in turn supports PP. The discussion suggested that if national pooling requirements are built on PP, development costs would be reduced. It also was noted that in one five-state region where PP was mandated, with EDR, maximum efficiency resulted; without EDR, database capacity is consumed by the demands of individual TN pooling.

Anna Miller commented that the long term direction of pooling is ITN; in the interim, industry has agreed to PP with EDR. Ms. Baca stated that ITN was a consideration, but it is currently not on the table. Commenters suggested that the appropriate direction is to start with PP with EDR, move to POD and EDR as an interim measure, and ultimately achieve ITN.

Mr. Foster stated that LM will ensure that no effort is wasted, and that EDR is generic enough to accommodate ITN.   Ms. Baca added the Group is and will continue to be mindful of future ITN development considerations during its present development of PP and EDR. Chairman Hasselwander stated that the NRO will consider this in its future discussions. He also remarked a "one size fits all" approach is unlikely to be successful. He, therefore, remarked that it is important to develop national standards that have the flexibility to accommodate the industry's future needs.

Mr. Foster declined to speculate on requirements in the NPAC for ITN, further stating that PP is the most straightforward approach to pooling. Mr. Foster reiterated that LM's focus will be on PP with EDR; it then will move to POD with EDR, if it makes sense. A concern was raised that by allowing flexibility, companies who do not require POD may incur unnecessary costs.

Ms. Baca discussed the LM letter of June 4th to the LLCs and the LNPA WG. Ms. Baca expressed concern about NPAC/SMS planning for the release of Release 2.0, which contains the functionality requirements needed to satisfy regulatory and industry needs for wireless participation in LNP by July 1999 and support for number pooling by December 1999. LM has been authorized by the LLCs to develop NPAC/SMS Release 1.4 to support interim number pooling in the Mid-West region for delivery in early September. LM recommended that the T&O and the LLCs reevaluate the change orders included in Release 2.0 to contain only those change orders necessary to satisfy regulatory and industry requirements for the latter half of 1999.

Ms. Baca reported that the T&O will determine, during the week of June 27, when the requirements for EDR can be completed. In response to a question concerning software development and whether software development will be handled sequentially or in parallel, LM stated that change order packages are developed in parallel, because most packages touch certain critical parts of the system.

Concerns were raised about the deadlines for the development of the EDR, PP and POD requirements and how those deadlines will effect regulatory requirement for pooling by December 1999. It was reported that the T&O requirements will be finalized by August. The repackage of change orders, under Release 2.0, along with the wireless package, may be ready for delivery and testing in November.

Concerns were raised about the approval process for change orders by the LLCs and whether, if change orders are approved by August or September, sufficient time remains for the development and implementation in April 1999 (wireless LNP). Anne Le Lena, Chairman, LLC, commented that the LLCs are trying to negotiate with LM, in a coordinated effort across the 7 LLC regions. Ms. Le Lena stated that it is extremely important that the NANC spell out for the LLCs critical time frames and deadlines.

There was agreement with the decision of the T&O to develop PP with EDR. Companies that support POD should explain the rationale for POD. The T&O Group also stated that because the majority of carriers do not need POD, it plans to move forward in a sequential manner. Four companies supported the development of POD. Although the group unanimously decided to go with PP with EDR, the discussion indicated that POD has not been eliminated as an option at some point in the future.

Proposals: NANC should direct the Task Force to proceed to develop requirements for PP with EDR, as quickly as possible. The Task Force then should move on to POD, with an eye on the recommendations and conclusions of the NRO Report, and bearing in mind that ITN may have an impact on its recommendations. The T&O should come back to NANC with a suggested deadline for its work. Service providers that wish to see POD requirements developed should provide the rationale for the needed flexibility (*i.e.*, the dual architecture for PP and POD) and work the issue outside of the T&O Task Force, so as not to encumber the ongoing work of the T&O team.

Ms. Baca reviewed the wireless integration activities. A recommendation was sent to the LLCs for a special wireless NPAC release due June 1, 1999. Ms. Baca reported that the LLCs forwarded it to LM for a statement of work (SOW), which is due back to the LLCs by June 26. Ms. Baca also reported that the requirements for the Local Service Request (LSR) feasibility study should be finalized by July 15. The T&O will make a recommendation to the LLCs to request a SOW from LM.

In light of Ms. Baca's retirement from AT&T at the end of June, the new T&O co-chair will be Tom Sweeney, AT&T. Co-chair Marilyn Murdock, SBC, was reaffirmed. The LNPA WG and Task Forces will be restructured and the restructuring will be announced at the July meeting. Chairman Hasselwander thanked Ms. Baca for all of her excellent work and support.

WWITF Report -- Paula Jordan. WWITF provided a status report on the June 15-16 meeting, its current action items, and its future meeting schedule. Ms. Jordan reported that subject matter experts (SME) attended the June meeting and provided technical information aimed at educating others about the provisioning of numbers. The WWITF reviewed NANC Change Order 201, and discussed porting scenarios with the SMEs. Ms. Jordan stated that the WWITF action item for the July meeting is to establish subgroups to develop porting provisioning flows between wireless and wireline carriers. The Task Force is on schedule for its December 1998 report on porting intervals.

C. *Abbreviated Dialing Ad Hoc Working Group --* Paul Hart. Mr. Hart reported that the working group sent a letter to several vendors and TIA (Alcatel, Lucent, Nortel, DSC, Siemens)

to solicit input concerning the time required to deploy four specified sequences. The Group anticipates that this input will be received prior to the next conference call, which is scheduled for July 8th. The Group then will decide how best to proceed. Mr. Hart reported that the Ad Hoc WG's objective is to submit the report to NANC in July; any outstanding perspectives might be accommodated by minority statements to the report.

D. Industry Numbering Committee (INC) Report -- Cathy Handley. Ms. Handley reported that Issue 102, governing the assignment of local routing numbers, is in initial closure with final closure expected in approximately six weeks. With respect to Issue 105, number pooling, agreements have been reached regarding LERG issues. Transfer of a 1000s block will be allowed when a customer ports from one service provider to another and when both service providers mutually agree to it. Discussion ensued over the current nine month supply guideline for both industry and service provider inventories. It was argued that to populate inventories at that level would exhaust the NANP.

Ms. Handley agreed to provide the INC's rationale concerning the inventories after the next INC report and to provide further information on this issue at the next NANC meeting.

Woody Kerkeslager added that INC needs to describe in detail the operations of the administrator and the time required to assign a block of numbers. Tony Pupek, USTA, stated that the 18-month inventory was based on forecasts and had proven to be necessary. Mike Bennett agreed that the request for a rationale for the nine-month supply is legitimate. Chairman Hasselwander noted the understandable concern on the NANC members for an explanation and justification for the inventories. NANC agreed that INC should report back in detail on the inventory process, providing an estimate of the effect of number utilization and hoarding on the inventory time frames so that the NANC has an understanding of, and can make a decision with regard to, the inventory standards recommended by INC. It was suggested that the INC requirement should have the inventory numbers embedded in the requirements, and, as a starting point, the inventory standard should be two months.

Proposal: Proposed that the service provider inventory should be the pooling administrator interval, plus one month (28 days + one month). If one or more new NXXs are required, the interval will be 66 days, plus one month. Concern was expressed that the INC-recommended 9-month inventory is too long; NANC directed that the issue be reworked at INC. INC should report back to NANC on the shortest interval practical and the rationale for its recommended replenishment interval.   Chairman Hasselwander stated that INC will provide a tutorial on the whole process at the July NANC meeting.

Ms. Handley reported that INC will discuss the timeline for development of the ITN administrative guidelines at the September LNPA workshop meeting (INC Issue 39). The next meeting, to be held by conference call, is scheduled for July 1, 1998.

E. Number Resource Optimization (NRO) Working Group Report -- Beth O'Donnell. Ms. O'Donnell provided updates on the States Issues, Individual TN, and Analysis Task Forces (see handout for specific details). A NRO issue matrix will be distributed at the July meeting.

The data request to the states was discussed. It was agreed that the request must have content specificity to be of value to the states. A common format for data collection will allow the states and carriers to make rational decisions based on real utilization data. NANC should establish the manner in which the data should be collected. Ms. O'Donnell then will take NANC's direction to the Working Group, which will, in turn, develop a sample data request.

Ms. O'Donnell reported that 14 optimization measures now are under consideration by the NRO, 3 of which need LNP to implement. Chairman Hasselwander commented that the NANC recognizes that not all 14 measures will be imposed on a nationwide basis and that the NANC expects that the NRO's report also will recognize that "one size does not fit all." In some situations, ITN will be the appropriate measure, in others, 1000s block pooling may be more appropriate, and in still other situations, pooling may not be needed at all. Chairman Hasselwander noted that NANC may receive a report for the NRO that draws conclusions and makes recommendations that are very different from what it expected at the outset.

Mark Golden, PCIA, agreed that the NRO must address different approaches, for example, where 1000s block is available, what other measures are available, including measures available to non-LRN capable service providers. It was noted that cost recovery issues should be considered when the alternatives are reviewed.   Ms. O'Donnell added that the NRO is sensitive to costs and will work cost recovery issues within the Cost Recovery Working Group.

With regard to rate center consolidation as an alternative, Mike Bennett reported that in the City of San Antonio, 21 rate centers will be reduced to one rate center and that this consolidation will delay NPA exhaust for at least five years.

Ms. O'Donnell reported that drafts of the NRO report will be provided to the NANC members by e-mail as they become available. John Manning, ATIS, stated that there has been no official communication from the NRO to ATIS to pursue the technical requirements work associated with NRO's work. Ms. O'Donnell stated that she will talk to Mr. Manning about the specific objectives of the NRO. Mr. Manning will liaison with INC to T1S1.6.

In response to vendor development questions on the number of months needed to make modifications to existing switches, Joe Kingrey, NorTel, stated that generally 18-months is required before software changes can be developed and made available. Mr. Kingrey noted that implementation of the software changes differs from availability of those changes. Implementation is dependent on individual carriers and their switches. Mr. Kingrey noted a concern that all vendors be ready to provide number pooling alternatives and a recognition that December 1999 is only 18-months away. It was suggested that vendors need a special communication from NANC to ensure they are aware of NANC's activities. Chairman Hasselwander will send such a letter to vendor contacts.

Guidance from NANC was requested as to what the NRO report should include.   The NANC stated that the NRO should look at all optimization measures from a qualitative standpoint and should eliminate those measures that do not have utility. Any national issues must go to the FCC and would be placed on public notice for comment. Chairman Hasselwander stated that the FCC gave NANC a minimum requirement -- to have a pooling procedure that is implementable by

December 1999. The NRO-WG Report should contain a significant analysis of ITN. Chairman Hasselwander stated that Council members should anticipate that NANC will have to hold a conference call after September 9, to discuss the draft NRO report.

F. Cost Recovery Working Group (CR-WG). Anne La Lena. Ms. La Lena reported that the NBANC Board will hold four face-to-face meetings. The NBANC has been asked to report directly to NANC on cost recovery issues; the CR WG will remain involved to the extent necessary. NBANC will alert the CR-WG if any situations develop.

In late June, Ms. La Lena attended the CANTO meeting and spoke about the NANPA cost recovery model. Ms. La Lena reported that a representative of the Bahamas said a check will be paid to NANPA in the amount assessed them. Representatives of the Dominican Republic have not yet responded, although representatives from CodeTel and TriCom agreed to follow-up.

Ms. La Lena reported that CANTO has requested that either Chairman Hasselwander or the Chair of the CR WG address its members at CANTO's October meeting in Trinidad. Ms. La Lena reported that through this workshop, an allocation formula for years two and three might be developed.

Ms. La Lena also reported that Canada has not been in active discussion with NANPA or the CR WG. She also reported that CRTC has a newly formed company. Leo Nevel, CRTC, who also serves as a director of NBANC, is the contact person. The CR WG will enter into private discussions with the new consortium.

A question was raised as to the overage in funds despite the non- payment from Canada and the Dominican Republic. Any overage will be invested in a fund. It was reported that GTE and CodeTel are working to address the non-payment of the Dominican Republic and will try to provide Ms. La Lena with a contact person in the Dominican Republic.

Mike Bennett announced John Banuelos' resignation as Cost Recovery Working Group Co-chair and read a personal statement from John into the record.

NBANC Report -- Vince Majkowski. The next NBANC board meeting will be held on July 21. John Ricker, NECA, will provide updates to NANC, pursuant to the Requirements document, beginning quarterly after March 31, 1998.

Mr. Majkowski reported that as of June 10, the fund balance was $1.57 million; the projected receivables from US carriers was $1.97 million, from Canadian carriers, $160,000, and from Dominican Republic carriers, $18,000. Payments of $825,000 have been made to LM, with remaining payments totaling $2.475 million. Payment of $62,000 have been made to NECA, with $186,000 in payments remaining. NBANC Board expenses to date total $3,633 ($2,868 in reimbursements, $756 for conference call expenses).

Significant issues: 119 carriers received refunds as of May 12, 1998. Of those, 103 were payphone providers, who remitted payment prior to the exemption status determination. The balance, 16 carriers, incorrectly provided contributions in excess of the required amounts. Letters

were sent to 431 non-compliant service providers notifying them that NBANC had not received their Form 496, nor their NANPA contribution. Carriers were notified that their failure to comply by June 12, 1998 would result in a report of their non-compliance to the NBANC Board of Directors, and potentially to the FCC. The NBANC deferred until the July meeting any action against non-compliant carriers.

The data collection form for 1999 was discussed. The fiscal year runs from March 1999 to February 2000.   A resolution was passed that, beginning with the 1999 collections, the failure to file would result in a $100 late filing penalty. The percentage of interest to be applied to late payments will be equal to the annual IRS charge. NECA will send a letter to all carriers advising them of the new penalties.

The 1999 form will be back from OMB by August 1, 1998. The FCC should approve the contribution factor in January 1999 and NECA will begin billing by February 1999, with payments due by March 12, 1999.

It was reported that the GAO sent a letter to the FCC stating that the NBANC and USAC, as non-profit organizations, are not authorized to have lines of credit.

Finally, NBANC has advised the FCC of its intention to hold a minimum of four face-to-face meetings a year.

G. New NANPA Oversight Working Group -- Chairman Hasselwander. Chairman Hasselwander reported that a public notice released on June 1, 1998 solicited interested participants to form the new working group. The list of responding organizations were read and accepted; BellAtlantic was added to the list. Chairman Hasselwander asked for volunteers to help organize and establish the new group. The organizational meeting will be held on July 23rd from 1:30 - 4:30 p.m. in the FCC meeting room. An agenda will be e-mailed to all interested parties.

H. COCUS and proposed line number utilization survey (LINUS). A discussion was held on the following policy questions, as outlined in the NANC agenda: (1) How to assure that all data are reported accurately, completely and on time? (2) Does obtaining data from resellers pose special issues? (3) Will data gathered be used for purposes other than forecasting exhaust, i.e., thresholds for granting (or taking back) resources?

Trent Boaldin, OPASTCO, expressed concerns about the neutrality of the administrator and the confidentiality of the information reported. Mike Bennett commented that with LM as a neutral third party, reported data information will be kept confidential. Peter Guggina agreed that there is no question that LM will protect the confidentiality of data that is reported.

A discussion ensued on the need for an incentive to report data and for some type of consequence for failure to report. Members agreed that carriers who do not report data should not receive further resources. Vince Majkowski commented that public resources must be used non-discriminately, both with respect to regulated and unregulated carriers, noting that paging and wireless carriers are not regulated by the states. Thus, he believes that rules must be promulgated

to get carriers' attention. Mr. Majkowski also noted that confidentiality has been the biggest issue faced by the State of Colorado in attempting to collect utilization data from carriers.

<center>**June 24, 1998**</center>

Opening Remarks. Chairman Hasselwander introduced the new Chief, Common Carrier Bureau, Kathryn Brown.

<u>Continuation of LINUS/COCUS policy discussion</u> -- It was suggested that the NANC should interface with the FCC's Office of General Counsel regarding to the appropriateness of a simple rule for the accurate reporting of utilization information. After allowing time for feedback from the Office of General Counsel, each company should consult internally on this issue to determine the least obtrusive way to conduct the necessary fact-gathering. Glenn Manishin, MCI, suggested that the FCC could issue a declaratory ruling finding that all carriers have an obligation to provide timely and accurate data under section 251(e) of the Communications Act. Support was expressed for first allowing the new neutral administrator to attempt to gather the necessary data, before resorting to a formal rule. Provided the confidentiality of information is protected, and information is only aggregated in a manner that does not allow it to be attributed to a particular carrier, there should be less need for a formal rule.

In the past, States have had the responsibility to collect forecasting information and have experienced an extreme reluctance by the industry to provide such information. Michelle Young, BellSouth, stated that wireless carriers have been reticent in the past to provide information and have relied upon the state's lack of jurisdiction over wireless carriers as a basis for not responding to information demands. She stated that compliance at the national level would be enhanced if a strong federal requirement were in place protecting industry information. Beth O'Donnell commented that Illinois had subpoenaed carriers in the past, without success. Thus, she questioned whether the neutral third party concept would be workable, in the absence of a federal rule.

It was suggested that NANC first should ask the associations to discuss with LM which method would yield a high response level and should not resort to the regulatory process. However, Ron Conners stated that, as administrators, they have had to beg carriers to get COCUS information. LM is, therefore, firmly convinced that a rule must be promulgated before information can be gathered in an efficient and timely manner. Cathy Handley suggested that the type of data requested is a concern and that carriers found the detail requested by some states overwhelming. She suggested the development of a standardized request.

It was suggested that based on the experiences of NARUC and NANPA, NANC should not be reluctant to recommend that the FCC promulgate a rule, to ensure mandatory, efficient data collection. Beth O'Donnell stated that the NRO-WG will develop a standard data request. Vince Majkowski stated that NARUC would support a standardized request and an FCC rule for timely, accurate and complete data reporting. Ensuring that public assets are provided to service providers are a concern at both the state and federal level.

Chairman Hasselwander stated that once NRO develops the standardized data request form, NANC can adjust as necessary from a policy standpoint. It was noted that the new LINUS model will not be available for sometime; in the interim there will continue to be data requests from the states. There is a need for a rule for the interim period while the development of LINUS is ongoing.

Proposal: NANC members should make contributions from now until the July meeting on the question of whether an FCC rule is needed to ensure that carriers report utilization data. Suggestions should state what needs to be done and why. The Council's goal for the next meeting will be to reach a decision on this issue.

Audits. *How do we know the data will be accurate?* Who has the responsibility to do an audit on a state by state basis? Chairman Hasselwander asked NANPA to address the question of the appearance of neutrality. Ron Conners stated that in the past, with 800 and 900 numbers, requests for additional NXXs and verifying the fill rate was a relatively simple process. The question here is more complicated. Mr. Connors stated that a significant number of 500 codes are not in use. NANPA needs more authority in the guidelines to conduct effective, fair and neutral audits.

A question was as to whether NANPA is required to audit service providers' utilization. The Requirements document included provisions for audits. The RFP and the evaluation associated with it were tailored to the guidelines existing at that time.

Resellers. The numbering resource is assigned to the underlying service provider (SP). A concern was raised about the impossibility of tracking utilization information from SP to wholesale consumer. It was suggested that NANPA should go to the user of the resources and obtain data directly from the reseller. It is important to have utilization data, not just forecast data. It also was suggested that NANC should take the view that it can review the manner in which any carrier uses the critical numbering resources.

Threshold Levels. *Could NANPA use data to withhold resources?* For reclamation, exhaust or potential exhaust situations, threshold levels, at which a carrier would be denied access to further resources, would need to be specified. It was noted that such threshold levels must be established as we transition from NXX to 1000s block to ITN. It was further noted that we must be able to carefully determine thresholds based on competition and new markets considerations. New competitors could result in significant NPA exhaust. Ron Conners stated that the industry needs to address how to learn from forecasting and how to provide good data. NANPA forecasting and actual use of the resource would provide benefits for modeling purposes, such as by defining the benefits of number pooling.

The Council agreed, as a basic policy question, that there must be a linkage between usage and the ability to get more resources. It also concluded that the process of obtaining more resources should be as objective as possible but a process that is too static might result in the failure to obtain necessary numbers. NANC wants carriers to have sufficient resources for their legitimate business needs.

I. Discussion of administration of 1000s block number pooling. A discussion of how the administrator should be chosen followed. Presentations were made by Bellcore and Lockheed Martin. The Requirements Document, at section 4.2, is the basis for the expansion of NANPA's duties, through the enterprise service characterization, without the need for an RFP.

Bellcore Presentation -- Mary Ann Smith. Ms. Smith stated that Bellcore is a new company, with extensive experience on numbering issues. She also stated that CO Code administration is more complex than NANPA; line level administration is complex and requires more innovative solutions.

Contamination. Ms. Smith stated that the administration of 1000s block number pooling is bounded by the number service providers and the complexity of the administration. Bellcore looked at contamination at the line information level. It was noted that Bellcore's premise is based on an evolution to ITN, although the industry does yet know whether ITN will be implemented. INC guidelines are in development for 1000s block pooling.

Ms. Smith stated that any intellectual property associated with its systems would be available to any subsequent vendors. Bellcore envisions that carriers will have two interfaces: one to NANPA for NXX assignment and a second with Bellcore.

Lockheed Martin Presentation -- Mark Foster. Mr. Foster stated that contamination is a non-issue. An entire block can be ported in the block holder's network, at a small cost on an incremental basis. In response to the question of whether ITN administration would be a biddable event, Mr. Foster commented that there is a difference in the overall functions of 1000s block administration and ITN administration. 1000s block administration can be accommodated under the current contract with LM/NANPA.

Summary of discussion and conclusions. NANC unanimously agreed that when the industry is ready to move to ITN pooling, the ITN pooling administration function should be subject to the competitive bid process. NANC reached consensus that the industry should not bid the 1000s block administration function, and that it is to be treated as an extension of the existing contract with LM/NANPA.

NANC will review the costs associated with the extension to 1000s block administration, i.e., what are the cost reductions relative to a reduced CO Code administrative function as a result of 1000s block administration. LM/NANPA will show net costs associated with extension to 1000s block and will present the information at the next NANC meeting.

 VI. Statement of Action Items and Decisions reached.

1. LNPA Working Group. Direction to T&O Task Force to proceed with work on PP/EDR, as expediously as possible, then move on POD second. Stay alert to NRO developments. Report estimate of times to complete at July NANC meeting. Offer option to any company to present rationale for POD at July NANC meeting.

2. INC Report. In regard to the INC report (pages 6 & 8). At the next NANC meeting, INC will provide a tutorial on service provider inventory and industry inventory intervals; including service provider request date to the pooling administrator; the pooling administrator allocation date and the actual effective date for a block to be put into service.

    For these items, INC should provide time intervals for each element and the supporting rationale in the tutorial. As a policy matter, NANC members believe these intervals should be minimized to the extent possible. The NANC therefore asked the INC to review those intervals with the objective of reducing if possible.

3. NRO Working Group. At the July NANC meeting, Chairman Hasselwander will review the status of telephone number reservation (previous recommendation was made by NANPA- WG). NRO Analysis Task Force activities should develop a data request for states to use. Beth O'Donnell will discuss NRO needs/support needed from T1S1.6 with John Manning. John offered to provide assistance in contacts with T1S1.6. Chairman Hasselwander will send a letter to vendors describing the activities at NRO and explain what is being considered. The letter will provide warning of an upcoming NRO survey and encourage responses. Chairman Hasselwander needs all NANC members to provide vendor contact information. The NRO will analyze all options to conserve numbering resources. The September 23 NRO report must include a detailed ITN analysis.

4. Discussion concerning policy questions on COCUS/LINUS. Contributions for consideration at next NANC meeting on the question of assuring complete, timely and accurate data reporting.

        -contributions should be specific with rationale, why proposal will work.
        -contributions solicited concerning obtaining forecasts from resellers.
        -contributions should address issue of audits.

There will be a linkage between data gathered and the issue of granting or reclaiming resources. Currently, how the linkage is specified is being and will be worked at the NRO.

5. NANC unanimously agreed that when the industry is ready to move to ITN pooling, that ITN pooling administration function should be subject to the competitive bid process.

NANC reached consensus that the industry should not bid the 1000s block administration function, and that it is to be treated as an extension of the existing contract with LM/NANPA.

NANC will review costs associated with the extension to 1000s block administration, i.e.,what are the cost reductions relative to a reduced CO Code administrative function as a result of 1000s block administration. LM/NANPA will show net costs associated with extension to 1000s block and will present the information at the next NANC meeting.