North American Numbering Council
Meeting Minutes
June 22-23, 1999   (final/approved 7/21/99)

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, 445 12th Street, SW, Room TW-C305, Washington, DC.

II.   List of Attendees:

A.   Council Members

Voting Members	Organization
1. Beth Kistner	ALTS
2. Edmund Gould	AT&T Corp.
3. Dan Hochvert	Bell Atlantic
4. Ronald Binz	Competition Policy Institute
5. Adam Kirschenbaum	CompTel
6. Lolita Smith	CTIA
7. Norm Epstein	GTE
8. Peter Guggina/Karen Mulberry	MCI WorldCom
9. Gerry Thompson	Mobility Canada
10. Vincent Majkowski	NARUC
11. JoAnne Sanford/Erin Duffy	NARUC
12. Beth O'Donnell	NCTA
13. Larry Krevor/Seth Jones	Nextel Communications, Inc.
14. Dan Gonzalez	NEXTLINK
15. Joe Kingrey	Nortel Networks
16. Michelle Thomas	Omnipoint
17. Trent Boaldin/John McHugh	OPASTCO
18. Robert Hoggarth	PCIA
19. Bill Adair	SBC Communications, Inc.
20. Ron Havens	Sprint Corp
21. Jacques Sarrazin	Stentor Resource Centre, Inc.
22. Gerry Rosenblatt	TIA
23. Paul Hart	USTA

Special Members (non-voting):
Ron Conners   NANPA

B.   Commission Employees

Diane Griffin Harmon, Designated Federal Officer (DFO)
Jared Carlson, Alternate DFO

Blaise Scinto, Deputy Chief, Network Services Division (NSD)
Tejal Mehta, NSD, Common Carrier Bureau (CCB)
Patrick Forster, NSD, CCB
Jeannie Grimes, NSD, CCB
Trish Greene, Accounting and Audits Division (AAD), CCB

III.   Estimated Public Attendance: Approximately 42 members of the public attended the meeting as observers.

IV.   Documents Introduced. Each member received the following handouts:
   (1)   Agenda
   (2)   May 25-26, 1999 Meeting Minutes
   (3)   LNPA Working Group Status Report to NANC
   (4)   Wireless Number Portability Subcommittee Report and Wireless Pooling
          Alternative Evaluation
   (5)   Telcordia Presentation – Originating LEC Query Issues on IXC Bound Calls
   (6)   Numbering Resource Optimization Working Group Report on COCUS Survey
   (7)   NANPA Performance Improvement Program Highlights
   (8)   NANPA Performance Improvement Plan Summary
   (9)   NANPA Revised First Annual Report
   (10)   FCC Public Notice DA 99-1198
   (11)   Cost Recovery Working Group Report
   (12)   NBANC NANPA Fund Performance Status Report
   (13)   Industry Numbering Committee Status Report
   (14)   NANPA Responses to May 25-26, 1999 NANC Action Items from the 1999
          COCUS and NPA Exhaust Analysis Report
   (15)   NANC Recommendation to the FCC Concerning the Replacement of the COCUS;
          Chairman Binz's amending language to NRO Report
   (16)   Dan Hochvert's replacement language for Section XI, NRO Report
   (17)   Audit IMG Report and Recommendation

V.   Summary of the Meeting:

A. Welcoming Remarks. Ron Binz, Co-Chair of the Council, provided welcoming remarks.

B. Approval of Minutes. Five changes to the May 25-26, 1999 NANC meeting minutes were suggested and incorporated. The minutes were adopted as amended.

C. Local Number Portability Administration (LNPA) Working Group Report Co-Chairs Shelly Shaw, Ameritech, and Anna Miller, BellSouth Cellular, presented the report to the Council. Ms. Miller reviewed the key wireless issues contained in the Wireless Number Portability Subcommittee (WNPSC) Report.

Ms. Miller reported that the WNPSC spent most of the June meeting addressing the effect of the Wireless Number Pooling Alternative on wireless carriers. In addition, the WNPSC discussed the NPAC Release Time Frame, and expressed wireless service providers' preference for two releases per year.

Ms. Miller reviewed the WNPSC's evaluation of the Wireless Number Portability Alternative, which includes a description of the option ("Without Phase 2 LNP, wireless service providers could donate and receive 1000 blocks from a number pool, given certain requirements."), circumstances governing its use, and a timeframe for implementation. Phase 1 LNP is the implementation of LNP database querying and call routing (to the terminating carrier) capabilities for wireless carriers by December 31, 1998; Phase 2 LNP is wireless service provider LNP implementation by November 24, 2002.

The "real issue" considered by the WNPSC was whether wireless service providers can participate in thousands-block pooling prior to Phase 2 LNP implementation. The WNPSC concluded that the alternative for number pooling would not be a viable method for wireless participation in thousands-block pooling prior to Phase 2 LNP. Implementing pooling before porting could jeopardize compliance with the November 24, 2002, wireless number portability implementation deadline, because of the requirements needed to support the alternative, as well as the associated impacts. The requirements and impacts for the alternative are detailed in the alternative evaluation report.

Moreover, the modifications necessary to support the alternative could not likely be implemented in a significantly shorter timeframe. The software to support wireless LNP was not developed with pooling before porting in mind. In fact, Phase 1 wireless LNP software is not even available for some wireless switches, and these wireless carriers are using default routing (the "triggerless" solution) in order to comply with the requirement for wireless carriers to query LNP databases by December 31, 1998. Ms. Miller also described a situation where a wireless carrier (carrier A) is allocated blocks of 1000 numbers from a Central Office code originally allocated to only one carrier (carrier B). Carrier A's switch, however, would not deliver calls placed from one to another of its numbers because the software would only recognize that the entire block of numbers was originally assigned to carrier B. Instead, carrier A's switch would attempt to deliver the call to carrier B's switch. Software currently available for Mobile Switching Centers (MSCs) considers only the first six digits of a ten-digit telephone number when routing a call.

In response to a question by Beth Kistner, ALTS, Ms. Miller stated that, because the MSC only examines the first six digits of the ten-digit telephone number to determine if the number is routed to its switch or to another carrier's switch, Phase 2 wireless LNP is needed to perform a query to determine the LRN associated with the pooled number so the call can be routed to the appropriate carrier's switch. Ms. Miller added that the problem lies in the inability of switches to examine more than six digits when attempting to route a call, where numbers within thousands blocks are allocated to different carriers.

Vince Majkowski, NARUC, questioned why moving from 10,000 number to 1,000 number allocations was such a problem, especially when it is basically the same functionality. Ms. Miller replied that the problem would not likely exist if both wireless LNP software Phases were available, and that it was dependent on the software delivered from vendors. Some switch/software vendors have combined the two capabilities, querying and LNP, but only Phase 1 software has been activated and tested. Wireless carriers that have switches with the combined capabilities could activate the Phase 2 software. Absent both phases of wireless LNP software, the switch would have to examine seven digits in order to route a call to the appropriate carrier.

Ed Gould, AT&T, commented that wireless software was initially developed with only wireline carriers porting numbers in mind, and was not written to consider numbers ported between wireless carriers. Ms. Miller concurred, stating that this caused vendors to develop software for each functionality separately. Software needs to be developed to handle both phases. Mr. Majkowski asked whether the software vendors developing wireless LNP software are making a consistent effort to develop this software by a specific date, who they are, and what these vendors and the industry are doing to accelerate development and implementation of wireless LNP software. Ms. Miller replied that an issue affecting the timeline is that one of the major switch vendors will not have wireless LNP Phase 1 software functionality available until 2001, and wireless carriers with these types of switches will not even have Phase 1 capability until then. Thus, given the timeline for testing and implementation of wireless LNP, which includes MIN/MDN separation, NPAC turn-up and intercarrier testing, the industry should concentrate only on wireless LNP implementation, so the November 24, 2002 deadline is not jeopardized; total wireless LNP implementation will support pooling.

Ms. Miller declined to identify which specific vendors are unable to meet certain software development deadlines, adding that there is no current mandate to implement pooling, so that is not the focus of many vendors.

Mr. Gray, GTE Wireless, stated that the issue is not whether wireless carriers could accept a number routed into their networks based on LRN technology, but national roaming is driving Phase 2. Wireless roaming requires MIN/MDN separation, which supports routing and the delivery of services. Software modified to support porting would not support roaming.

Additionally, Ms. Miller stated that the Phase 1 query needed to route calls could be conducted by another carrier, and that the handling of incoming calls that have NPA-NXXs that were originally assigned to other switches requires full wireless LNP software and MIN/MDN separation. Gerry Thompson, Mobility Canada, added that the intent of Phase 1 is to complete calls from a mobile switch to a ported environment. The carrier can query an LRN database to route the call either on its own, or have another carrier to do. With a mobile to ported call, a query must be performed on the 10,000 number block declared ported. In a thousands-block-pooling environment, a loop, or "two-dip" process could be established to route the call. Mr. Thompson noted that software development for the wireless industry is not easy, and that it is not realistic to think a small software change can easily fix the problem.

Chairman Binz suggested that NANC members state specifically what issues the WG needs to clarify so they can be presented at next month's meeting. Ms. Miller stated that registration still needs to be addressed. Paul Hart sought clarification on whether Phase 2 wireless LNP must be implemented completely in order to participate in thousands-block pooling. Mr. Hochvert stated that he would like to understand which switch suppliers are developing software in phases, and that development in separate phases seems inefficient. Chairman Binz asked whether software development to address the number pooling barriers Ms. Miller identified could be separated from the implementation of wireless LNP.

Mr. Majkowski questioned, given that it is a competitive global market that is moving to a technology neutral environment, why it is not possible to implement this software solution, especially since it has already been done in Europe. Ms. Miller replied that some vendors already have, or will soon have, full wireless-LNP software available. The other part of the equation, however, is that wireless carriers are busy implementing Phase 1 wireless number portability and at this time there is no mandate to implement number pooling. Resources are currently being devoted to implementing the querying capability as soon as possible, and then to separating the MIN/MDN so full wireless LNP can be implemented by November 24, 2002. Lolita Smith, CTIA, stated that part of the regulatory mandate is to support nationwide roaming, and that this is why MIN/MDN separation was chosen. For this reason, one can not just look at software upgrades to accomplish one function. Instead, one needs to look at everything that must be accomplished in light of the regulatory mandate.

Gerry Thompson stated that Europe uses a different technology -- Global System for Mobile Communications (GSM) with Signaling [Message Relay] technology, which allows porting today. Most U.S. wireless carriers, however, use Advanced Mobile Phone Service (AMPS) time division multiple access and code division multiple access (TDMA and CDMA). The software is being developed separately because the standards for Phase 1 and Phase 2 were developed separately, and Phase 2 standards were just made available in December 1998. Vendors do not work ahead of standards, and there is a two to three year period needed for software development.

Chairman Binz suggested further discussion on this matter be held until the next NANC meeting. The critical issue is whether the wireless industry can remove the barriers to the alternative wireless pooling method with a software approach, rather than waiting for full wireless LNP implementation, which will require MIN/MDN separation.

Ms. Shaw presented the remainder of the report. Regarding the LNP Problem Identification and Management (PIM) PIM Proposed Work Plan, the WG is still working on the scope PIM, and is trying to define the depth and ability of the WG to manage it. The team is awaiting receipt of a "Recommendation for LNP Problem Identification and Management" letter from the NANC. Upon receipt of the letter, the team will need one month to finalize the scope of the PIM and an additional month for finalizing processes. So far, the team has developed the following: (1) a

form for service providers to submit issues; (2) a way to track issues from receipt to resolution; (3) a way to communicate unresolved issues to other committees/groups that are better equipped to resolve the issue; (4) a way to track closed issues for future reference, and (5) a web site has been offered by a volunteer so the process information is readily accessible to the industry. The team continues to have concerns about resources, authority, and enforcement.

Ms. Kistner questioned why the PIM team is "waiting on receipt of the official 'Recommendation for LNP Problem Identification and Management' letter from the NANC." It was agreed that the team should consider the previously drafted letter, on which consensus had been reached at the April NANC meeting, to be official, and that the team should move forward accordingly. Additionally, Bill Adair asked for clarification on the statement that the "team continues to have strong concerns about resources, authority, and enforcement." Ms. Shaw replied that the concerns were not itemized in the report received from the PIM Team, however, one such concern was whether the recommendation for the PIM letter was to be considered to be official or just a draft. The resources, authority, and enforcement issues are being addressed separately. Mr. Gonzalez expressed concern about delays in addressing LNP performance issues and asked that the group make specific procedural recommendations, if possible, and that the NANC act upon them, so substantive issues can then be addressed.

Mr. Hochvert read from page four of the previous meeting's minutes: "Working group members are also concerned about authority and enforcement issues. Chairman Hasselwander asked Mr. Sweeney to elaborate on the authority and enforcement issues. Mr. Sweeney replied that some of the members are not convinced that there will be a problem with non-compliance, and would not know how it will be handled until a problem occurs." Mr. Hochvert commented that when a working group is asked to address an issue, it should do so, regardless of authority and enforcement difficulties, and then let the NANC deal with the outcome. This is what Chairman Hasselwander concluded in the last meeting -- that if they have those concerns, let the NANC work them, but do not let them interfere with the job.

Ms. Shaw reported that the development of the Wireline/Wireless Integration Report is now complete, and the report will be transmitted to NANC members via email by the end of June.

Regarding the status of NPAC/SMS Release 3.0 (National Number Pooling), the WG has reviewed the clarifications presented in Exhibit B of the statement of work (SOW). Of the two changes identified, one (deemed to be minimal) was rolled into the SOW at no additional charge and the other was minor enough to be delayed until the next release. Everything in Exhibit B is complete and is in agreement with Lockheed Martin (LM). The Midwest and Northeast Limited Liability Corporations (LLCs) have both asked LM for information regarding accelerated delivery of the Efficient Data Representation (EDR) portion of Release 3.0. The Midwest LLC has specifically asked for a revised SOW. This is in response to industry concerns regarding national number pooling being mandated by state commissions prior to the necessary functionality being implemented. The WG Pooling Subcommittee was tasked to identify the EDR functionality (for SMS/LSMS) required to support a national number pooling architecture, in response to the LLC

goal of accelerated EDR delivery. To complete this task and support the revised SOW request from the Midwest LLC, the sub-team developed a timeline and deliverables, with their first meeting to be held June 28-20, 1999 in Chicago.

Regarding the Change Management/Release Management Timeline. The current change management process is being revised. The WG has committed to having the flows and narratives delivered to the LLCs after the next meeting. The Release Management process has been documented and submitted to the LLCs for review and acceptance. The revised process consists of a six and three-fourths quarter implementation timeframe before stabilizing into a two SOW, two release per fixed 12 month schedule. This is a change from the previously suggested one SOW, two release per year schedule.

Regarding the Slow Horse Update, Steve Addicks, MCI WorldCom, was elected as committee chair. The team agreed to the following work plan: (1) Complete analysis of March, April, and May Slow Horse data; (2) develop a recommendation to the WG based on the data analysis; (3) develop LSMS interface performance requirements, and (4) determine and recommend who the enforcement authority for LSMS interface performance requirements should be. Also, determine and recommend who the LSMS certification entity will be.

The next LNPA WG meeting will be held July 12-15, in Ottawa, Ontario.

D. N-1 Query Issue. Adam Newman and Marcia Guza, Telcordia Technologies, gave a presentation on the Originating LEC Query Issue on IXC Bound Calls. Mr. Newman reviewed the history of the T1S1.6 Working Group's activity on this issue. The issue arose in a letter ballot comment in August 1998 by SBC in which it suggested that the originating local exchange carrier (OLEC) should be allowed to do the LNP query even when the call is to be IXC-routed. Telcordia, at the April 1999 meeting, proposed modification in the switch requirement, and agreed to bring a revised contribution to the June NANC.

Mr. Newman summarized the proposed capability for IXC-routed calls – the OLEC can specify whether to perform the LNP query, on a per-IXC basis. That is, the contribution proposes that the query result would be forwarded where there is agreement with the IXC to do so. This differs from the April 1999 contribution, which provided that an OLEC could make a query and that an IXC could request that the result of the query be suppressed for any call bound for its network.

Peter Guggina, MCI WorldCom, asked for clarification on what the term "on a per-IXC basis" meant in the first bullet and where such capability would be used. The OLEC would perform the query only if the IXC requests. Mr. Hart cited to and quoted from language in the March 11, 1997, FCC *Memorandum Opinion and Order*, CC Docket 95-116, supporting the idea of queries being performed only where a business arrangement is in place. In light of the FCC Order which provides that carriers should negotiate among themselves which carrier should perform the query, Mr. Hart opined that there is no NANC business here.

Mr. Newman continued through the report, reviewing the motivations for the OLEC query and the responses to concerns raised during the May 1999 NANC meeting (listed pages 5 through 8 of the presentation); reviewed several of the LNP performance criteria from the FCC's LNP *First Report and Order*, and concluded that the proposed enhancement meets all of the FCC performance criteria. The report's final conclusion was that the contribution does not seek to change established FCC or NANC policies.

Mr. Guggina questioned whether parity would be effected; that is, whether the IXC would be able to select a third party vendor as easily as having the originating LEC perform the query. Ms. Guza replied that it should not affect parity, that it is just another option for the IXCs to contract with the OLEC to perform the query. Further, in response a question whether there would be any difference in call processing if the query option is suppressed, such as post-dialing delay, Ms. Guza said that there should not be, but the carrier could specifically ask a vendor.

Additionally, Mr. Newman noted that the LEC only charges for the queries if there is a contractual agreement and if it performs the query. Ms. Kistner commented that LEC query tariffs contain two rates, one for a contracted query, and one for a default query, and that the lack of a contractual agreement does not necessarily preclude a charge. Ed Gould, AT&T, stated that an OLEC should be allowed to perform the LNP query on all dialed calls, but can charge another carrier for such queries only if there is a contractual agreement in place. Mr. Newman replied that the contribution, in its current form, states that the query is only performed when there is an agreement with the IXC in place.

Mr. Hart commented that for location portability, a query must be "backed up" and that it is an important option for carriers to decide where the query is performed. Mr. Newman advised that the contribution has already been changed and submitted twice, but as yet has not been accepted as a contribution by T1S1.6. It is likely that it will undergo additional changes. If the contribution is accepted, then vendors could begin development and offer these features to customers.

Mr. Epstein suggested that this is not an issue the NANC should be debating because it is not a T1S1.6 issue that would impact a standard. Brian Foster, T1S1.6 Chair, stated that, under the T1S1.6's standard operating procedures, changes may be made up until the contribution goes out for balloting, and not all companies that participate in balloting participate in developing the contribution. Mr. Guggina commented that the NANC is addressing this issue because MCI WorldCom previously asked several questions at T1S1.6 that were not answered. Also, at the last NANC meeting, it appeared that the contribution had the capability to change the paradigm of where the query is performed, which caused significant concern. Mr. Guggina also questioned whether standards are in place governing passing information from the originating carrier to the IXC that require modifications. Ms. Guza replied that they have found no standards that require modification. If there is any such information, then it exists in the Bellcore Generic Requirements, and these would not have to be changed. Ms. Guza commented that page 4 of the presentation, which outlines the motivation for the contribution, was also presented in the April NANC T1S1.6

meeting.

As a result of the presentation and discussion, Chairman Binz suggested a follow up letter to T1S1, closing the concerns raised in the June 10 letter which stated, in pertinent part, that at the May 1999 meeting NANC discussed some of the issues raised by T1S1.6's proposed action on this item. NANC's position is that this issue should not be assumed to be merely a technical one, and until NANC has an opportunity to investigate the potential policy issues that may be associated with the Telcordia contribution, it was suggested that T1S1.6 refrain from developing any modifications to the existing LNP requirements or LNP queries. It was agreed that a letter should be sent to T1S1.6 stating there are no policy issues raised by the proposed changes to the Telcordia contribution. Mr. Guggina concurred, and requested that the letter also include a statement that there should be no mandatory language in the standards, but that the requirements should be invoked only with mutual agreement between carriers. Chairman Binz concurred and stated that a draft letter would be prepared. The information presented today should remove concern this will be done in the absence of a mutual agreement between carriers. How the standard is implemented is then up to the carriers.

It was further clarified that the default is the current process, in the absence of a bilateral agreement. Mr. Hart expressed concern about the NANC's involvement in the standards process. Chairman Binz concurred and stated the letter will serve to establish boundaries for T1S1.6 regarding this issue. If a standard is eventually adopted in this area, then the NANC could become involved at the appropriate time. Mr. Hart reiterated his concern with NANC's involvement in the standards process, adding that how this is implemented depends on carrier choice. In this case the FCC has statements as to how this is to occur and the process in T1S1 is consistent with that. How a standard is implemented is then up to the carriers.

E. Numbering Resource Optimization (NRO) Working Group Report. Co-Chairs Beth O'Donnell and Mike Whaley provided the report to the Council. The final version of the report distributed at the meeting was slightly changed from the soft copy circulated by Chairman Binz (a substitute page 5 was distributed, which carries into the Executive Summary the major substantive change to the final paragraph on page 35). The reserved number issue will be discussed at the July 1999 NANC meeting.

Mike Whaley reviewed the report. The report responds to the NANC's request, and evaluates 3 alternative proposals to the current COCUS and proposes a fourth model, the Hybrid model. The WG analyzed the cost and feasibility of all 4 models. Based on this analysis, the WG concludes in the report that "the Hybrid approach appears to provide the optimum balance of keeping the data collection and reporting burden on service providers at a manageable level, while providing the NANPA with the additional resources needed to provide more accurate exhaust projections."

Mr. Whaley reviewed the assumptions contained in Section II of the report. The 1999 enhanced COCUS is the baseline model. A major weakness of this model is that inaccurate data will not result in a good forecast. Section IV describes the deficiencies in the current COCUS. Each of

the alternatives listed in Section V, with a comparison against the desired attributes to each alternative, Section VI, were discussed at the last meeting. Section VII contains table 3, which compares the level of compliance of each alternative with the desired attributes. Ms. O'Donnell clarified that all 4 alternatives should be in the "Does Not Meet" category for the ability to accommodate mergers and acquisitions.

Section VIII assesses the relative costs and utility of each alternative. Cost estimates were invited, and NANPA provided information for table 4, which summarizes relative costs as compared to the 1999 enhanced COCUS. Mr. Whaley clarified that the costs provided by NANPA are based on estimates to develop, deploy and do COCUS; service provider costs are additional costs that service providers would incur, and there is quite a range on what service providers say it will cost them.

Section IX recommends the Hybrid approach. It also recommends a threshold for increased reporting forecasting and utilization data, and reporting on a semi-annual basis where NPAs have less than 5 years to exhaust, and where there is a significant increase in code consumption over and above what was projected. General concerns were raised about the level of reporting, and the WG feels that it could reach consensus on this issue. Section XI discusses implementation considerations; the WG feels that NANPA needs explicit enforcement authority to conduct the COCUS. Section X lists the tasks needed for implementation.

Chairman Binz reminded Council that CCB Deputy Chief Yog Varma requested a recommendation from the NANC and suggesting that the NANC needs to take the report and fashion it as a NANC report. Mr. Whaley interjected that there is not consensus on some issues; however, Chairman Binz indicated that lack of WG consensus should not keep the NANC from reaching agreement. NANC's endorsement of the recommendation may depend on changing certain aspects of report.

Mr. Majkowski supported adopting the recommendation. Mr. Guggina agreed, but asked to discuss the utilization data issue, referring to footnote #18, which states that some service providers supported reporting utilization data at the NPA-NXX level, while others supported reporting at the NPA level, and service providers always have the option to report at more granular levels. Mr. Guggina opined that providers should have a standardized expectation of what level should be reported. Mr. Whaley stated that there is consensus on the level that should be reported in pooling areas, but not in non-pooling areas.

Beth Kistner raised the issue of whether categories other than "unavailable" would be reported. Ms. O'Donnell stated that NANC members were asked to submit their thoughts electronically at the May 1999 NANC meeting, and the WG reached consensus that only unavailable numbers would be reported. Norm Epstein stated that GTE prefers to report at the NPA level, and sees no benefit in more granular reporting unless there is pooling. Ms. Kistner suggested that additional granularity would provide important information in a non-pooling environment because there is no way to look at data by rate center.

There was further discussion on what level of granularity would give NANPA the best information and utility of reporting at the NPA-NXX level. John Manning stated that the primary benefit of more granular reporting is with pooling; such data is necessary to plan to start pooling. In response to Chairman Binz's question about whether reporting at the NPA-NXX level would improve exhaust projection for NPAs within the exhaust window, Mr. Manning replied that it would give a better and more accurate picture. Mr. Epstein raised the issue of the costs involved, and added that some of this data already exists. It was suggested that because additional granularity is not significantly more expensive, NXX-level data should be collected. Bill Adair, SBC, stated that he sees no benefit in a non-pooling environment, and it would be onerous on some small companies to provide such data. Ms. Kistner suggested that reporting at the NPA level, as with the current COCUS, has not worked (citing to numerous surprise exhausts), and that collecting data in the same fashion will leave NANPA with the inability to make accurate forecasts. Mr. Hochvert stated that all companies have to collect utilization data to run their businesses, so reporting at the NPA-NXX level should not be a significant additional burden. Lolita Smith, CTIA, noted for the record her concern about the burden of reporting at the NPA-NXX level in non-pooling areas that would result for wireless carriers.

Mr. Majkowski observed that the 3 year implementation time line seemed long; Mr. Guggina agreed, and suggested that the WG reconsider the time line. Ms. Kistner asked who submits the detailed cost information (task # 3 from page 35) and for what purpose. Mr. Epstein replied that the WG was attempting to determine costs if the function is not out-sourced; NANPA would provide this cost information. Chairman Binz added that it is unsettled in the report whether NANPA or a subcontractor would conduct the COCUS. Mr. Epstein stated that the WG would decide, based on a detailed requirements document yet to be developed, whether it should be bid or sole source.

There was further discussion on what type of mathematical model needs to be developed, and what other implementation steps, including software development, are needed. Mr. Gould suggested that the 1999 enhanced COCUS algorithms be used until a model is available. Mr. Guggina suggested that information should be collected in an RFI in advance of an RFP instead of the industry attempting to do it at the non-expert level, and that the detailed requirements could be used for the procurement process.

Chairman Binz asked for further discussion on the 3 year implementation time line. Mr. Hochvert observed that LNP was implemented in less than 3 years, and further suggested that the period could be shortened if driven externally by parallel effort and sufficient industry resources. Chairman Binz also asked whether the report comports with the FCC NRO NPRM. Ms. O'Donnell responded that the report does not recommend some of the FCC's tentative conclusions in that NPRM.

It was suggested that the Council try to close out at least the two major issues – the level of reporting and the 3 year development time line. Mr. Majkowski agreed that the report should be

forwarded with editorial changes, and asked if the industry was comfortable with the 3 year time line. NANPA has indicated that it will take approximately 18 months, without questioning the cost involved. Mr. Hochvert indicated that, given that there are no requirements developed yet, a 3 year outside limit may be the best estimate. Mr. Guggina stated that a time line is needed for each phase; Mr. Adair agreed, stating that collection of data and data manipulation are two different things. The program to "plug" the data into can be developed later. The Council reached consensus that the report would be submitted in its current form; that a paragraph describing a range of time for implementation would be inserted (avoid committing to a 3 year time line, but also not committing to another time frame).

There was further discussion on the granularity issue. Mr. Epstein asked for more information on what the additional benefits of more granular data would be, and the trade-offs associated with it. Other details discussed were NPA vs. CO code exhaust; further disaggregation of the "number unavailable" category; standardization of information; information on reserved numbers; and verifying the accuracy of reporting. Larry Krevor, Nextel, stated that the value of this exercise would be undercut by limiting the data and spreading implementation out for 3 years.

Chairman Binz called the question of whether the category of unavailable numbers should be disaggregated into the 6 INC categories; 9 were in favor, 9 opposed. The question was rephrased as whether all reporting inside the exhaust window should be disaggregated into the 6 INC categories in pooling areas; 12 were in favor, 8 opposed. In non-pooling areas inside the exhaust window, the Council voted 17 in favor and 3 opposed to reporting at the NPA-NXX. No vote was taken on the reporting level for non-pooling areas outside the exhaust window.

Chairman Binz suggested that the document be revised and proofed by the WG co-chairs and the Chairman of the NANC. The cover memo should include a notation on disaggregation. Chairman Binz further stated that the assumption is that the COCUS report would be produced every 6 months; however, Mr. Manning added that something could trigger NANPA to do a COCUS more frequently. In response to a question about whether Council members would get another chance to review the report before it goes to the FCC, Chairman Binz stated that he could commit to distributing the revised report 2 days prior to submission, but that the Chairman would likely be reluctant to make any substantive changes.

A few additional edits to the report were suggested. Mr. Gould reminded the Council of an open item – what mathematical model would be used to analyze the data. Mr. Manning stated that he envisioned NANPA starting with what was used for the 1999 enhanced COCUS, and modifying it as needed. Chairman Binz stated that the NANC would give the FCC provisional time lines. Robert Hoggart, PCIA, acknowledged the effort of the NRO WG in development of recommendation. Finally, attachment 1 (description of the Hybrid approach – included for clarification) will be removed, and the report will be revised accordingly. Attachment 2 (excerpts from the Thousand Block Pooling guidelines) will also be removed.

F. NPRM Workplan Discussion. Chairman Binz referred to email guidance from Chairman

Hasselwander suggesting how NANC should to proceed to handle its assignments under CC Docket 99-200. NANC members were requested to consider how to proceed on the issues overnight for a fuller discussion at June 23, 1999, session. The tasks were outlined by NPRM paragraph number and the nature of the response required was highlighted. Some issues will require NANC to report before the end of the comment date of July 30, 1999, while others require a report or recommendation by the reply comment date of August 30, 1999.

The tasks to be worked are as follows:

Paragraph 38, directs NANC to make a recommendation regarding what measures discussed in Section IV (Administrative Measures) should be adopted as FCC rules. The NANC response is due by the August 30th reply due date. It was suggested that a short term IMG should be formed to respond to this issue.

Paragraph 88, seeks comment on whether to direct NANC to select an entity to audit carrier number utilization and forecast data using a competitive bid process. NANC will await report by the Audit IMG schedule for June 23, to determine if the presentation is responsive to the paragraph 88 tasking. It was also noted that the NANPA Oversight WG have been assigned to audits in general.

Paragraph 90, directs NANC to report its progress on audits. It was suggested that the Audit IMG report scheduled for June 23 may be responsive to this request. The NANC response is due by the July 30th comment cycle.

Paragraph 165 seeks NANC conclusions or recommendations regarding pooling, including pooling by CMRS carriers, based on NANPA's [exhaust] projections or the Team's findings), NANC will refer this matter to the SG for recommendation development for later review by the full NANC at the July NANC meeting.

G. NANPA Oversight Working Group Report. Co-Chair, Andrea Cooper, reported on the status of the NANPA performance improvement work plan presented at the March 16-17 NANC meeting. As requested, NANPA responded with a work plan within 60 days; the WG has been working with NANPA and supports the work plan. The WG will continue to monitor NANPA's performance of the work plan monthly.

Ron Conners, LM, reviewed the highlights of its performance improvement program. First, NANPA has developed a close working relationship with the WG. Communication with the WG is good and NANPA will continue to propose changes and get input from the WG. NANPA's goal is to get an "outstanding" rating from the WG. Steps taken by NANPA include revising its Annual Report by adding updates and financial data; improving customer response timing and educating employees through sensitivity training on customer service; facilitating the new outreach effort to the PSCs and industry with roundtable meetings; and meeting with state commissions to understand their needs. Staffing changes include the hiring of Brent Struthers;

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Cathy Handley, formerly of PCIA; and John Manning, formerly with ATIS. Both are working on improving internal infrastructure issues and assisting with compliance to the NANPA Oversight WG compliance matrix.

NANPA NPA relief notification process improvements include calling jeopardy in a timely manner; and beginning relief and publishing planning letters expeditiously. Increased staffing levels have enabled NANPA to be more responsive and distribute NPA relief planning documents to the interested parties quickly. Also, improvements are underway to make the NANPA.com web site more user friendly and to post updates on a weekly basis or as needed. Additionally, copies of the NANPA performance improvement plan summary matrix and its revised first Annual Report.

June 23, 1999

H. Cost Recovery Working Group Report. Co-Chair Anne La Lena, MCI WorldCom, presented the report to the Council. The issues under review are further elaboration and/or development of cost recovery/allocation work products, and support for IMG pooling activity efforts. The issue of the cost allocation recommendation for ITN and UNP is on hold. Ms. La Lena reviewed the WG's recommendation for a business arrangement between NANPA in pooling administrator role and the NPAC. The WG is not asking the Council to adopt the recommendation today; the WG will elaborate on the recommendation and seek approval from the Council at the July 1999 NANC meeting.

There is no current payment arrangements through the NPAC of any sort existing now. The purpose of the suggested business arrangement is to (1) avoid 1K pooling and administration cost under the LNP cost allocation formula. *See* August 1998, CRWG recommendation that the LM cost to the industry for 1K block pooling be distributed among service providers and collected by the NBANC under the NANPA cost allocation formula. This recommendation was adopted by the NANC. (2) Provide clear understanding of activities to be undertaken by NPAC with prices and terms as necessary; (3) aid billing and collection activity by NBANC, and (4) aid in delineation of responsibilities if more than one entity performs of the functions.

Ms. La Lena explained that if the NPAC does not expect any payment for development or services or functions performed to support 1K block pooling and administration activity, any agreement between the two entities would have service terms and conditions but no dollar value. Questions or comments on this contributions can be entertained between now and next month. The item will be modified somewhat, but the core recommendation will not change.

NBANC Report. NBANC Chair Vincent Majkowski, NARUC, provided the report to the Council on the fund status and significant NBANC activities. The current fund balance is $2.03 million; projected receivables total $2.04 million, with payments to LM to date total $1.07 million, with remaining payments totaling $3.21 million for a total fixed contract for this year of $4.28 million. Payments to NECA total $64K to date with remaining payments totaling $193K. Board

expenses are $5,258; this includes member reimbursement of $4,373 and meeting expenses of $878. Payments to an external auditor, Price Waterhouse Coopers for year one was $16K, with year one remaining of $6K and year two will be $22K.

The Dominican Republic contribution of $17.8K has been paid. For the 1999 Funding Process, the Dominican Republic made its contribution of 1999 as well. Alfred Oyog, Cable & Wireless, has agreed to coordinate and assist with NBANC collections from the remaining 12 countries. As of June 3, 1999 3,810 forms have been received; reporting gross revenues now total $232 billion, with net revenues totaling $188 billion. In the 1998 NBANC operations audit Price Waterhouse Coopers found NBANC financial statements to be a fair presentation of the financial position of the corporation at the end of the fund year.

I. Industry Numbering Committee (INC) Report. INC Co-moderator Shawn Murphy AT&T, presented the report to the Council. Issues going to final closure are listed on page 3 and issues in initial closure are on the page 4 of the report. The results of the Interim LNPA workshop meeting were noted -- the ported-out numbers definition was removed from the thousands-block-pooling administration guidelines and glossary, as well as any associated forms and appendices; there was a recommendation to modify Form 1B of the Thousand Block (NXX-X) Pooling Administration Guidelines so it can be used for both block activation and block change processes at the NPAC.

INC seeks further clarification from the NANC on what it meant by "business arrangement" in its November 1998 decision that all issues of reporting of forecast and utilization information by resellers and Type 1 carriers should be addressed through business arrangements made with the code holder. Mr. Murphy noted the differences between wording in the NANC decision and in the NRO Report on COCUS. The NRO Report states that reporting will be done consistent with "existing business arrangements." INC raised several questions on page 8 of the report; the heart of the issue is whether it is reasonable to expect resellers/Type 1 SPs to provide forecast/ utilization data to potential competitors. INC also raised several concerns on page 9 of the report whether the NANC decision is inconsistent with the principle of neutral third party number administration and this appears to be a step backward. The November NANC decision does not support the objective of obtaining complete and reliable forecasts from all carriers; legal and jurisdictional issues – for example, interconnection agreements are under state jurisdiction.

Norm Epstein, GTE, commented that INC was trying to write specific guidelines and needs to know what "business arrangements" means, so obligations specifying who supplies what information can be formulated. Mr. Murphy concurred, but stated this and other items, such as interconnection agreements, were secondary concerns, which only matter if the NANC stands by its original decision. Mr. Hart suggested that the NANC decision may need to be changed, and that the issue could be discussed in next month's meeting. Chairman Binz agreed, adding that the NANC should discuss whether the issue should be reopened. Ms. Kistner questioned whether Resellers and Type 1 Interconnection customers were already required to provide carriers with advance notice of their numbering needs (*i.e.*, what are the existing business arrangements?). Mr. Murphy the carriers are not getting this data, so that assumption is wrong. Ms. O'Donnell stated

that she thought the data was already being supplied and suggested that the meeting minutes be reviewed in order to determine why the decision was reached before revisiting or changing the decision.

Mr. Majkowski agreed with Mr. Hart's comment and noted that states are responsible for arbitrating interconnection agreements. If the agreement is not arbitrated and is a business agreement between parties, the states will only look at neutrality and nondiscriminatory aspects. The states will honor that agreement, as long as neutrality and nondiscriminatory criteria are met. If the agreement is arbitrated, however, the states will delve into the questions of utilization and forecasting to ensure that the information is provided. From a NARUC and states point of view, if NANPA needs the information, it does not matter who provides the information, as long as the data is only accessible through a confidentiality agreement.

Peter Guggina commented that there could be problems with resellers providing their own data and that it may be more efficient if code holders reported the data. Also, resellers should be required to provide utilization data and capacity requirements to the underlying carrier, otherwise the system will not work. Mr. Guggina supported revisiting the issue at next month's meeting. Mr. Adair concurred, but noted the data currently received from resellers does not include utilization data, which forces carriers to guess. Ms. O'Donnell questioned whether Type 1 interconnection agreements are under state jurisdiction, the feasibility of the NANPA studying resellers, and whether the problem was forecasts or utilization. In response to the first question, Mr. Murphy replied in the affirmative. In response to the second question, Mr. Binz replied that the NANC could do something like that. In response to the third question, Mr. Murphy replied that it was actually both, even though carriers could, in some cases, compile utilization data. Also, it would be easier for resellers to provide utilization data than it would be for carriers to figure out which lines are actually in use. In response to a query, Mr. Murphy stated that Chairman Hasselwander's statement only talked about reporting forecast information, not utilization information, which is needed. The INC, after analyzing the NRO Report, concluded that the report included forecast and utilization reporting. Thus, the INC needs clarification concerning the NANC decision and the NRO Report.

Mr. Hart suggested that specific items could be discussed next time, and that resellers have specific obligations for reporting information, as does the code holder. Trent Boaldin, OPASTCO, noted the difficulty in formulating guidelines to govern the relationship between resellers and code holders where the NANC decision indicated that they should not address that relationship. Chairman Binz suggested placing this issue on next month's meeting agenda and asked who should organize and lead the discussion. Mr. Hart suggested that the INC should led the discussion, and Chairman Binz agreed that it should be a part of INC's report and discussion at the July 1999 NANC meeting. Mr. Guggina suggested that resellers, such as TRA, be invited to next month's meeting, so that the objective – to get an efficient collection of data for NANPA to analyze – can be explained. Mr. Murphy added that from his perspective, it was a forecast and utilization issue, and suggested that the NANPA's view on the burden of obtaining the data should be obtained.

Mr. Murphy continued with the report. The INC 500/900 Number Portability Effort was withdrawn, as directed, effective May 28, 1999. The LNPA Workshop will meet again on July 13, 1999 and on September 14, 1999.

J. 1999 COCUS and NPA Exhaust Update. John Manning, Lockheed Martin, provided a response to several action items from the May 1999 NANC meeting. The NANPA database of code holders was updated with the responses to the 1999 COCUS. There are over 900 service providers in the database – which reflects approximately one half of the current code holders. Currently, NANPA is collecting information in the CO code assignment process through the Part 1 form to update the database. The Part 1 form contains contact information within each code holder's organization. NANPA is also working with industry associations for help and cooperation regarding contact information.

Mr. Hochvert asked for clarification on what the following statement "46% of the total number of CO codes assigned in the sample NPAs were to service providers that did not provide 1999 COCUS. Mr. Manning replied that, of the entities in the 10 NPAs surveyed that had received a code, one-third did not provide any form of 1999 COCUS input. After totaling the NXXs assigned to all entities in the ten NPAs, and calculating the percentage attributable to those entities that did not respond to the 1999 COCUS, Lockheed Martin found that 46 percent of the codes were assigned to carriers that did not respond to the 1999 COCUS.

Mr. Hochvert commented that it could be more useful to have a report based on the response rate by industry segment. In other words, what industry segments are not reporting? Mr. Manning replied that additional information, such as the number of carriers in each industry segment, is needed to provide that level of information. This effort is linked to "purifying" the NANPA database to reflect how many carriers are providing which type of service.

Mr. Manning confirmed that he remembered there being a request to look at the effects of rate center consolidation (RCC) at the last meeting, but added that one was not included in the published action items. To consider RCC in each NPA would involve a lot of work. Chairman Binz and Mr. Hochvert agreed that this issue was not made an action item. Mr. Hart asked whether there is a role for the NANPA Oversight Working Group (NO WG). Ms. Kistner asked whether there was a model NPA used in the NANAP Exhaust Study, using an average number of rate centers, that could be used to estimate the effects of RCC. Mr. Manning replied that this could be done, but the results would apply to one NPA would not necessarily apply to another.

Mr. Hochvert asked whether the NOWG is working on a code holder database for NANPA. Ms. Cooper replied that this consolidation has not yet been completed, but there is an effort within NANPA to do this. Ms. Cooper added that she believes it is the NO WG's role to make sure NANPA has the tools to get the information, but it is not the NO WG's role to monitor who reports. Mr. Manning concurred and noted that USTA has already provided extensive help and other associations have volunteered to assist in the data gathering process.

K. Continued Discussion on NRO COCUS Replacement Report. Chairman Binz provided draft language in a separate handout for review. It was agreed that the suggested edits, reflecting the discussion on June22 should be incorporated into the report. All edits will be highlighted as NANC edits. Trent Boaldin opposed to changes to the table requiring more granularity in data reporting. Dan Gonzalez noted that this issue was highlighted in the previous meeting. A suggestion was made to possibly add a footnote to express the interest of small and rural telephone companies may have with the more granular level of reporting. The footnote will state indicate there was a split over the level of granularity. It was also noted that this very issue is also teed up in the NPRM.

Beth O'Donnell suggested that the vote be reflected the vote in the footnote and that NANC did not reverse the NRO. It was agreed that the second sentence of footnote under NANC amendments to the NRO WG Report would state that a majority of the membership favored a recommendation that utilization be reported in more disaggregate categories, and that the NANC did not reach consensus on this issue. A separate NANC cover page will be added to reflect that edits are made within the text, in addition of a transmittal letter. This will be re-circulated before going to the FCC.

L. Steering Group (SG) Report. Peter Guggina provided an update on the evaluation of the sole source bid number pooling administration negotiations with LM. The IMG has concluded and is recommending that the function should be competitively bid. Full discussion by the NANC will have to be held under a closed door session subject to non-disclosure agreement by NANC members and/or alternates. It was agreed that the closed-door session would take place during the July 1999 NANC meeting. Mr. Guggina emphasized that this is only a recommendation at this point, until discussed by the full NANC. It was also noted that in the interim, the IMG may have some ongoing activities.   In order to ensure a quorum for the closed sessions, Council members were requested to affirm their intent to attend via email and to acknowledge that they have signed a non-disclosure agreement.

M. Continued NPRM Responsibilities Assignment Discussion. Chairman Binz reviewed the list of NANC tasks identified in the NPRM. Paragraph 165 - pooling recommendation, the previous Exhaust Study Team along with NANPA and any other NANC member who want to participate will take that matter up. Paragraph 184, tentatively conclude entity to serve as the pooling administrator adequately addresses, etc., is simply inviting comments on whether to seek a recommendation on this issue from the NANC.

With regard to paragraph 121, seeks comment on how to ensure that rate center consolidation does not impact E911 systems. It was noted that this matter has a lot of technical implications and each rate center consolidation is unique due to the diverse conditions within each jurisdiction. Mr. Majkowski stated that the issue transcends overlays, splits and routers within the state, and that standardization of the equipment in the PSAPs influences these aspects. Due to time constraints perhaps NANC should wait for public comments before reacting. This is really an E911 issue. Ed Gould agreed that this is a routing question not a rate center consolidation

question. It was suggested that perhaps the language in paragraph 121 is really seeking an architecture recommendation. The paragraph states in pertinent part, "… are the issues that arise regarding 911 default routing sufficiently similar in each state that we should consider referring the matters to NANC for a *recommendation on a solution or set of solutions that could be used in all states undertaking rate center consolidation*?" (Emphasis added).

As a result, additional discussion centered on the entity responsible for proposed technical requirements, T1S1.6. As an example, LNP is a national standard; when the number pooling standard is complete T1 would be responsible to do that. The questioning of proposal technical requirements or waiting for approval is a temporal issue. Paul Hart stated that a stable set of standards are required before a vendor can manufacture the software. In response to a question concerning what is the relationship between ANSI and T1, Dan Hochvert explained that national standards for LNP were directed to T1. The T1 specification is the national standard. Equipment vendors built it to the national standard. Certain specifications continue to be identified by T1S1.6 to build or not to build the requirements. Mr. Hochvert further clarified that T1S1 is a small part of the overall T1 committee, and that ANSI is a group that sets up the process by which standards are agreed to and reviews the overarching agreement to ensure that good process was used in arriving at establishing a standard. Gerry Rosenblatt, TIA added that ANSI conducts an accreditation process and committees may be later audit by ANSI. Ed Gould reminded the Council that the establishment of LNP standards was not done in a traditional manner – but rather at the state level.

Chairman Binz suggested forming IMG's with volunteers for approximately 2 months to tackle issue in paragraph 38, recommendation regarding measure to be adopted with FCC rules. This issue has an August 30, 1999 deadline. It was agreed that an IMG will be formed with the following participants: Bell Atlantic (Jo Gallagher or Jim Castagna), NARUC (Erin Duffy); OPASTCO (Trent Boaldin); MCI WorldCom (Karen Mulberry); SBC (Bill Adair); NCTA (Beth O'Donnell), Nortel Networks (Joe Kingrey); PCIA (Robert Hoggarth); Sprint (Ron Havens) and Nextel (Larry Krevor). Bell Atlantic will organize the first conference call/event.

In response to paragraph 165, exhaust model, it was agreed that an IMG will be formed with the following participants: USTA (Tony Pupek); NCTA (Beth O'Donnell); Omnipoint (Carl Hansen); Nortel Networks (Joe Kingrey); CTIA (Lolita Smith); PCIA (Rob Hoggarth); MCI WorldCom (Steve Addicks); GTE (Norm Epstein); Nextel (Bob Edgerly); SBC (Bill Adair); AT&T (Ed Gould) and Bell Atlantic (Jo Gallagher). LM NANPA is invited to participate. USTA agreed to facilitate the first event. The IMG's response is due at the August 24-25, 1999 meeting so that NANC can comment within the reply comment period.

In response to paragraph 90, audit information and procedures – it was agreed that this issue will be referred to the existing Audit IMG. With regard to paragraph 88, apportionment of audit responsibility, the Audit IMG report to NANC of June 23, 1999 is responsive to that point.

In response to paragraph 184, recommendation of what entity should serve as a pooling administrator, the existing Number Pooling Administration IMG, will provide its report and

recommendation on the LM bid to the full Council for discussion at the July NANC meeting. Thereafter, NANC will forward a progress report to the FCC.

Chairman Binz reminded the Council and the newly formed IMG's that an early report is desirable, but all reports should not exceed the August 24-25 NANC meeting for full Council approval before the August 30, 1999 reply comment period. In particular, paragraph 38 (which measures should be adopted as FCC rules) is a very important issue and the FCC is expecting something significant from NANC on this matter.

N. Audits Issue Management Group (IMG) Report. Karen Mulberry, MCI WorldCom provided the report to the Council. The Audit IMG was tasked to investigate issues raised in the NANPA April 7, 1999 which suggested that NANPA was not responsible for audits, and consider issues later raised through discussion at the May 1999 NANC meeting regarding NANPA's obligation to conduct audits under the fixed price bid. Ms. Mulberry drew a distinction between auditing and verification. After an audit is performed, the NANPA may need to acquire additional information from the service provider. With regards to the Audits IMG's recommendation, Lockheed Martin understood, in its numerous responses, its responsibilities to administer industry guidelines, which establishes NANPA audit responsibilities of the application provided by a service provider when requesting an NXX. Lockheed Martin also provided references to the auditing framework and aging documents. These obligations and responsibilities, however, are future responsibilities that are not included in any existing industry guidelines. The NANC has done some work in this area but nothing has been put in place. The Audit IMG recommends that the NANC develop an auditing requirements document and solicit a competitive bid from the top five accounting firms. The requirements document should include sections on auditing the NANPA and all service providers based on assignments.

Ms. Kistner questioned the ambiguity in the recommendation, which suggests that the IMG determines that there are already baseline audit responsibilities in the NANPA contract, but also recommends that auditing requirements be opened to competitive bidding. Ms. Mulberry replied that the IMG was trying to address the fact that the NANPA letter mentioned some future auditing activities, which were the auditing framework documents being developed by the NANPA Oversight Working Group and the NANC's document on aging and administration of numbers. These are future activities, with potential changes to industry guidelines, and it could be useful in managing the audit process if they were all incorporated into one requirements document. The baseline audit responsibility would remain in the administrator's realm to verify and ensure that the details on the application remain true and accurate.

Mr. Guggina requested clarification on whether the NANPA would actually visit a service provider to perform "for cause" audit of its records and assignments. Ms. Mulberry replied in the affirmative and further explained the types of audits to be performed by, and what are the NANPA's responsibilities in this regard. Basically, there are three types of audits: (1) verification during the application process; (2) an audit triggered by something, and (3) random or scheduled audits. Future work, and the details concerning the application of random and other audit types are contained in the Audit Framework document that the NANPA Oversight Working Group is

currently drafting. The Audit IMG determined that this future work that may be better managed by selecting an auditor through a requirements document and a competitive bidding process to select an auditor.

Ms. Kistner noted the types of audits mentioned in paragraphs 84-86 of the FCC's Numbering Resource Optimization NPRM: for cause, regularly scheduled, and random. Ms. Mullberry commented that these terms are also used in the Audits Framework document. Ms. Kistner questioned whether the group determined that the NANPA contract covered "for cause" and regularly scheduled audits, but random audits would be performed by another party. Ms. Mulberry replied that the NANPA contract covered for cause audits that only concern application information needing further scrutiny. Regularly scheduled and random audits are contained in the draft audit framework document and are being discussed by the NANPA Oversight Working Group.

Jim Castagna, Bell Atlantic, commented that the baseline includes examination of the criteria and basic eligibility of a service provider applying for resources. In performing its day-to-day activities, the Audit IMG felt that if the NANPA had questions about service provider eligibility, then it should have the opportunity to perform an audit.

O. Presentation by Lockheed Martin CIS. Jeff Ganek stated that LM strongly agrees with the Audit IMG's report. The LM letter of April 7, 1999, to Chairman Hasselwander inferred that NANPA is not responsible for verification. Mr. Ganek apologized for the misunderstanding generated by the correspondence on this issue. The intent is for NANPA to provide all the services needed and verification of the application process is included the fixed price bid. NANPA is available to work with both the NANC and the industry to understand what is included in a verification process and strive to meet those requirements. There are extensive audits with firms qualified to conduct such audits. NANPA will help to specify requirements and provide assistance to the Audit IMG. NANPA agrees that it is responsible for "for cause" audits in the application verification process.

P. Other Business. None

Q. Next Meeting: July 20-21, 1999.

VI.   Action Items and Decisions Reached.

1. Local Number Portability Administration Working Group (LNPA WG). NANC will continue wireless pooling evaluation discussion at July NANC meeting. More information and input on barriers to wireless service providers' participation in Thousands Block pooling absent full Phase 2 deployment is needed.

LNP Problem Identification and Management (PIM). The LNPAWG is to consider that the April 1999 NANC recommendation concerning LNP PIM is official, requiring LNPA WG action as outlined in the April meeting record. The WG should not be distracted by questions of authority and enforcement. NANC will deal with those concerns as stated in the April meeting record. The WG should consider accelerating its process and attempt to complete its recommendation for the July NANC meeting due to the fact that PIM scope need not be addressed.

2. <u>N-1 Query Issue.</u> A follow-up NANC letter will be developed for transmittal to T1S1.6 regarding the Telcordia contribution matter. The letter will state that, based on the Telcordia presentation at the June meeting, NANC has determined that there are no policy issues attributable the proposed contribution.

3. <u>Numbering Resource Optimization (NRO) Working Group Report</u>. NANC will forward basic recommendation to FCC with a cover sheet explaining the origin of the report and NANC modifications to it. Text added to the report will be highlighted so it can be easily identified. The WG will develop pert chart/basic time line structure for later submission to the FCC.

NANC strongly favored NPA-NXX reporting in non-pooling areas within the exhaust window. NANC was split on disaggregated number reporting. Negative voting parties indicated willingness to consider more detailed reporting in the future.

Nextlink revision to footnote in the draft document provided by Chairman Binz was accepted. Additional changes to Report pages 35 and 36 worked during NANC meeting -- NRO Chairs are custodians of those online changes. For consistency, corrections will also be required in the Executive Summary. The NANC Chair and NRO leaders will craft text/letter forwarding to the FCC; NANC members will be accorded brief review of details before forwarding.

4. <u>Steering Group Report</u>. Number Pooling IMG recommendation for a competitive bid process was announced and will be discussed during a closed portion of the July NANC meeting. Only NANC members and alternates who have signed non-disclosure agreements and FCC staff will be allowed to attend the closed session. In advance of the July meeting, NANC members must advise via email their intention regarding attendance at the closed portion of the meeting (primary and/or alternate member). The non-disclosure agreement may be obtained from Jeannie Grimes, FCC (jgrimes@fcc.gov).

5. <u>Cost Recovery Working Group</u>. Issue of business arrangement between NANPA in pooling administrator role and the NPACs is being worked. A draft recommendation was provided to the NANC and will be discussed at the July NANC meeting.

6. <u>1999 COCUS Update</u>. John Manning, LM, provided response to May 25-26, 1999 action items on 1999 COCUS and NPA Exhaust Analysis Report. NANPA Oversight Working Group will explore its role in collecting and acting on reporting data for industry segments.

7. <u>Industry Numbering Committee (INC) Report</u>. INC presentation with regard to resellers reporting forecast and utilization data on number resources. NANC will consider whether to modify its current policy position on this issue at the July meeting in conjunction with the INC report. NANC will attempt to invite resellers (possibly TRA) to join discussion.

8. <u>Assignment Responsibilities under CC Docket 99-200</u>. In response to NPRM paragraph 38, recommendation on which administrative measures should be considered for possible FCC rules, an IMG will be formed with the following participants: Bell Atlantic (Jo Gallagher or Jim Castagna), NARUC (Erin Duffy); OPASTCO (Trent Boaldin); MCI WorldCom (Karen Mulberry); SBC (Bill Adair); NCTA (Beth O'Donnell), Nortel Networks (Joe Kingrey); PCIA (Robert Hoggarth); Sprint (Ron Havens) and Nextel (Larry Krevor). Bell Atlantic will organize the first conference call/event.

In response to paragraph 165, exhaust model, an IMG will be formed with the following participants: USTA (Tony Pupek); NCTA (Beth O'Donnell); Omnipoint (Carl Hansen); Nortel Networks (Joe Kingrey); CTIA (Lolita Smith); PCIA (Rob Hoggarth); MCI WorldCom (Steve Addicks); GTE (Norm Epstein); Nextel (Bob Edgerly); SBC (Bill Adair); AT&T (Ed Gould) and Bell Atlantic (Jo Gallagher). Lockheed is invited to participate. USTA will facilitate first event. Response due at August NANC meeting so that NANC can comment within the comment cycle.

In response to paragraph 90, audit information and procedures – this will be referred to the Audit IMG. With respect to paragraph 88, apportionment of audit responsibility, the Audit IMG report to NANC of June 23, 1999 is responsive to that point.

In response to paragraph 184, recommendation of what entity should serve as a pooling administrator, the Number Pooling Administration IMG at the July NANC meeting, will provide its completed report and recommendation on the LM bid to the full Council for discussion. Thereafter, NANC will forward its progress report to the FCC.

9. <u>Audit Issue Management Group (IMG)</u>. NANC accepted report provided by IMG for "for cause audits" pursuant to INC guidelines; NANPA Requirements Document and *Third Report & Order*. NANC will determine group to begin development of requirements document for audits other than "for cause audits." Audit IMG will work with LM on clear definition of responsibilities and functions.