North American Numbering Council
Meeting Minutes
September 28-29, 1999 – *final 10.20.99*

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:

Voting Council Members:
1.	Beth Kistner	ALTS
2.	Shawn Murphy	AT&T Corp.
3.	Dan Hochvert	Bell Atlantic
4.	Terry Monroe/Jonathon Lee	CompTel
5.	Ron Binz	CPI
6.	Lolita Smith	CTIA
7.	Norm Epstein	GTE
8.	Karen Mulberry/Peter Guggina	MCI WorldCom
9.	Gerry Thompson	Mobility Canada
10.	Erin Duffy	NARUC
11.	Vincent Majkowski	NARUC
12.	Amy Putnam	NARUC
13.	Andrew Ulmer	NASUCA
14.	Phil McClelland	NASUCA
15.	Beth O'Donnell	NCTA
16.	Larry Krevor/Seth Jones	Nextel Communications
17.	Dan Gonzalez	NextLink Communications
18.	Ray Strassburger	Nortel Networks
19.	Carl Hansen	Omnipoint
20.	Trent Boaldin	OPASTCO
21.	Harold Salters	PCIA
22.	Bill Adair/Gilbert Orozco	SBC
23.	Ron Havens	Sprint Corp.
24.	John Hoffman	Sprint PCS
25.	Ben Walston	TIA
26.	Paul Hart	USTA

Special Members (non-voting):
Ron Conners	NANPA
Maria Estefania	ATIS
Brenda Stevens	CRTC

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

Les Selzer, NSD, CCB Network Services Division, Common Carrier Bureau
Tejal Mehta, NSD, CCB
Pat Forster, NSD, CCB
Jeannie Grimes, NSD, CCB
Aaron Goldberger, NSD, CCB

III. **_Estimated Public Attendance_**. Approximately 41 members of the public attended the meeting as observers.

IV. **_Documents Introduced_**. Each member received the following handouts:
- (1) Agenda
- (2) August 28-29, 1999 NANC Meeting Minutes (draft)
- (3) NANPA 1999 CO Code Assignment Activity Report
- (4) NANPA Oversight Working Group Report
- (5) Revised NANC Audit Framework Recommendation
- (6) Audits IMG – NANPA "For Cause" Audits
- (7) Lockheed Martin NANPA Trial Audit presentation
- (8) Number Resource Optimization (NRO) Working Group Report – Telephone Number Reservations
- (9) Dan Hochvert, et al., contribution regarding telephone reservations
- (10) Reseller and Type 1 Wireless Forecasting and Utilization Data proposal
- (11) Wireless Number Portability Subcommittee (WNPSC), Key Issues & Action Items
- (12) WNPSC Status Report Matrix
- (13) Local Number Portability (LNPA) Working Group Report
- (14) LNPA WG Advisory – Problem Identification Management (PIM)
- (15) Slow Horse Subcommittee Report
- (16) IMG Paragraph 165 – Draft Final Report
- (17) Cost Recovery Working Group Update
- (18) NBANC Update
- (19) Industry Numbering Committee (INC) Report
- (20) NPAC Oversight Responsibility Recommendation
- (21) MCI WorldCom NPAC Feature Uniformity
- (22) Lockheed Martin Number Pooling FAQ's

V. **_Summary of the Meeting:_**

A. **_Opening Remarks._** Chairman John Hoffman provided the opening remarks, expressing his pleasure and honor to be chairing his first NANC meeting. A few house keeping and administrative matters were addressed. With respect to the NANC charter renewal, a public notice (DA 99-1864) was released on September 13, 1999, announcing the General Services Administration (GSA) approval for the renewal the NANC charter through October 4, 2001.

Chairman Hoffman stated that a presentation by Deputy Chief, Common Carrier Bureau, Yog Varma at the PSC conference in New Orleans on September 21,1999 was

informative, and provides an excellent overview of the critical issues facing the NANC. Copies of the presentation were provided to all interested Council members.

Chairman Hoffman stated that his goal is to provide an advance copy of the agenda to Council members at least a week prior to each meeting. Additionally, going forward the agenda will be standardized as much as possible. He suggested that the NANPA's report be placed first on the agenda to set the stage with respect to issues that are of concern to the NANPA and to review where the NANC may be on such matters.

B. ***Approval of Meeting Minutes***. The August 24-25, 1999 meeting minutes were approved following adoption of suggested changes from Philip McClelland, NASUCA, and Norm Epstein, GTE. Additionally, non-substantive edits were provided off-line by Dan Hochvert, Bell Atlantic.

C. ***NANP Administration 1999 CO Code and NPA Assignment Activity Report.*** John Manning presented the report, which covered both NPA and CO code assignment activity (as of Sep. 20, 1999) to the Council. The information was reported in a series of tables. Table (1) is a generalized summary of the total resource, including how many NPAs have been assigned and how many are available. Tables 2, 3 and 4 provide a summary and estimates of the number of new area codes needed for the year 1999 (Table 2), the year 2000 (Table 3), and the year 2001 (Table 4). Tables 5 and 6 update information on the 29 codes for the year 1999 and 37 codes for the year 2000 that were projected to go into service.

Table 1 shows the following; Of the 800 NPAs in the NANP, 362 NPAs remain available; 80 NPAs are reserved for NANP expansion; 20 NPAs in the 37X and 96X series are set aside per the Industry Numbering Committee (INC) NPA Allocation and Assignment; 20 NPAs are being used for various purposes (N11 (8); non-dialable toll points (2); Mexico roaming (8); plus "950" and "555" (for feature group B and 555 service); 12 service codes are in use; 15 additional service codes are reserved for PCS (6) and toll-free (9); 42 NPAs are assigned outside the US; and 249 NPAs are assigned within the US. The 8 non-dialable toll point NPAs are scheduled for return in 2001. The Mexico roaming codes are scheduled for release/return in January 2003. Three of the service codes in use (880, 881 and 882) are for "toll free paid sent paid" calls to enable toll free dialing outside the US; these codes are scheduled for return in 2004. "Assigned" NPAs are no longer available for consideration and are removed from the balance available. 43 of the 362 NPAs remaining are easily recognizable codes (ERCs).

Table 2 shows the new NPAs implemented in 1999, and the start date of permissive dialing (which is the effective date of the NPA). There are 4 NPAs for which the permissive dialing date has been delayed per state commission order or, in the case of Illinois, the activation of the relief NPA has been delayed as a result of number pooling. Code reclamation may change exhaust estimates.

Table 3 summarizes projected new NPAs for the year 2000. The table indicates that 45 relief NPAs are anticipated, several of which have already been assigned. The projected

exhaust dates for each relief NPA are based on the 1999 COCUS. Table 4 summarizes projected new NPAs for the year 2001; 31 relief codes are anticipated, with estimated exhaust dates between 3Q2001 and 2Q2002.

Mr. Manning noted that, although Tables 2 and 5 each show 31 relief NPAs for 1999, there is not a direct correlation in the NPAs identified on each table. Table 5 shows the NPAs identified for relief in 1999 as reported in the April NANP Exhaust Study. Table 6 shows the NPAs identified for relief in 2000 as reported in the April NANP Exhaust Study.

Mr. Manning discussed improvements in the NANPA's operations. The NANP web site contains a variety of information including the status of NPA relief activity, planning meetings, etc. A copy of the Aug/Sep 1999 NANPA newsletter has been issued. The newsletter discusses central office code and NPA code assignment, and provides a list of other industry and regulatory web sites. Also, the NANPA is moving from fax distribution to application and assignment by electronic interface.

Mr. Manning discussed several action items from the August NANC meeting.

Three-way split of Arizona NPA 602. Permissive dialing began in March 1999. 37 NXX codes were duplicated in each of the two new NPAs (480 and 623), although not the same NXXs were duplicated in each. As of September 20, 1999, there are 228 available NXXs in 602, 512 NXXs in 480, and 659 NXXs in 623. Carriers assigned NXXs prior to 5/1/99 could have requested to have a code duplicated in one of the new NPAs up until 9/1/99. No additional codes will be duplicated in these NPAs.

Karen Mulberry, MCI WorldCom, asked whether there was a grandfathering process in place to allow the alarm industry additional time to migrate all of their customers. This question will be referred to the code administrator for the 602 region and will be discussed at the next meeting.

"Pent up" Demand. Large requests for CO codes in NPAs coming out of rationing in the first half of 1999 were examined. Approximately 200 to 250 NXX code assignments were estimated to be the result of pent up demand. Mr. Manning cautioned that each NPA code should be examined individually, because the actual demand in each NPA varies.

Bill Adair, SBC, requested a status update on the Minnesota 602 and 610 relief situation. Mr. Manning will provide information on the number of NXXs duplicated as a result of the split to the Council by e-mail.

Norm Epstein, GTE, questioned whether relief activity and activation of new codes would be minimized in the last half of 1999 due to Y2K concerns. Mr. Manning responded that he assumes the industry accounts for Y2K concerns in establishing relief plans; he has heard of no Y2K-related problems to date.

August NXX code assignments. There were 1,386 gross NXX assignments in August --
this figure does not reflect any reclamation that may have occurred; 1478 NXX
assignments were made in July 1999. NANPA introduced the issue of large volume CO
code requests at the INC September meeting. INC agreed to address what additional
information the NANPA could request to substantiate when the request does not match
up with the six-month history or the 12 month projected forecast. INC is addressing this
matter and NANPA will continue to work with INC. NANPA is continuing to receive
large CO code requests and, as a result, has implemented a process to work with the
service provider for additional information and keep the FCC informed.

Bill Adair raised an issue regarding the Texas PUC's order for relief in the 409 NPA.
The Texas order alluded that the NANPA may not be willing to conduct all the necessary
implementation activities, and directed SBC to facilitate the implementation process.
The initial meeting will take place in about one month, but several meetings beyond the
initial planning meeting are normally required to complete an NPA relief project. It is
NANPA's position that it is required to be involved only with the first implementation
and planning meeting for the introduction of a new area code; thereafter, the service
providers are responsible for any additional meetings. SBC has asked NANPA to
facilitate all of the meetings needed for the entire relief process. It is NANPA's view that
this would be considered an enterprise service that it would have to offer to everyone, and
it is currently trying to gauge what the demand is for this type of service. A NANC IMG
previously addressed the issue of NANPA's responsibility for the implementation process
vis à vis the NANPA requirements document and the FCC's rules and orders. By the
next NANC meeting, NANPA will clearly state a position on what it believes to be its
responsibility for participating the relief planning process.

D.   NANPA Oversight Working Group. Pat Caldwell, Co-Chair, provided the report to
the Council. Mr. Caldwell gave an update on four areas identified as needing
improvement in the 1998 NANPA performance review: (1) NANPA has established a
mechanized way to distribute documentation (access through the NANPA web site is
explained in NANPA newsletter); (2) NANPA's enterprise service for administrative
OCN will be developed; (3) review of the improved COCUS plan has been completed;
and (4) NANPA has created a training module for its relief planners to improve their
skills in administering or facilitating meetings.

A preliminary schedule has been established for the 1999 NANPA performance
evaluation. A survey is being developed and will be presented to the NANC for its
concurrence in November. A workplan and entire survey package will be presented to
the NANC at the December meeting. The survey will be distributed to service providers
on January 3, 2000. Distribution of the survey will be accomplished through key industry
associations and directly to each service provider using NANPA's distribution lists. The
surveys and the NANPA's annual report are due in February. The WG will develop a
draft performance evaluation report during the first week of April for delivery to the
NANC by the May 23-24, 2000 meeting.

Two new issues will be addressed by the WG: (1) the volume of CO code applications generated in California jeopardy situations, and (2) NANPA/industry intellectual property rights. The first issue was raised by Walter Mosely in a letter distributed by e-mail on September 15, 1999. The letter states that 9,000 of the year's nearly 24,000 CO code applications through mid-September were in California. California requires re-submission of a code request each month in order to be eligible for the lottery, which results in a high volume of code requests (currently a third of the nation's CO code applications). This could trigger an increase in the cost of CO code administration nationally because under the current fixed price contract, LM assumed an average of 10,000 CO code requests per year over the five-year period. If LM exceeded that amount by 120% it would be permitted to come back to the Council and FCC for a price adjustment. The IMG wants to address whether procedurally, the NANPA has to perform the full scope of administration for the re-submittals month after month. The WG is seeking concurrence from the NANC to monitor this situation and be prepared to address it if necessary. Chairman Hoffman stated that it should be monitored; more facts should be gathered and more analysis on the practice and the associated costs should be done.

Karen Mulberry, MCI WorldCom, added that the California jeopardy procedure and application process may be required under California law, and offered to investigate the issue. Dan Hochvert, Bell Atlantic, stated that California probably required this process with the goal of establishing a more effective code assignment process based on demonstration of a continuing need by each service provider. NANC should first consider California's goal and whether the goal has been met. If not, the process is just an administrative burden. If the goal has been met, however, maybe the procedure should be expanded. Harry Monroe, CompTel, requested clarification on whether California may be considering eliminating the re-submission requirement, or if that in fact happened. Mr. Caldwell responded that the requirement has not been eliminated.

The second new issue is the identification of transferable intellectual property rights under the NANPA contract. The NANPA has identified software and intellectual property and related hardware. Some in the industry opine that any major investment that was made with industry money belongs to the industry and is therefore transferable. The WG believes this issue will require regulatory and or legal analysis to determine what intellectual property would transfer to a different NANPA.

Paul Hart, USTA, commented that early on there was considerable discussion about this issue and asked whether the WG had reviewed the record to determine what commitments were made and whether they are insufficient to address the concerns raised today. Karen Mulberry added that there are different interpretations of the FCC's language in the *Third Report and Order* and in the NANPA contract. There may be a need for some additional legal advice to explain or interpret what the language of the rule actually means.

Paul Hart suggested that the facts need to be assembled from formal agreements and other records to properly address the issue. Chairman Hoffman suggested that the WG

better define the issue between now and the next NANC meeting, identifying the different positions of the two sides. Pat Caldwell responded that the WG brought it now without all the details to alert the NANC that it is coming. The WG knows that it will need some interpretations and will not be able to resolve the issue simply from the documentation to be gathered.

Mr.Caldwell continued with an overview of the audit framework document. The WG created a clearer definition of "for cause audits." The WG was also tasked with addressing the issue of regulatory requirements as a part of the audit. The final report was presented for NANC approval and the WG recommended forwarding the final document to the Industry Numbering Committee (INC). The definition was read into the record: "*For cause audits are audits conducted on an entity to verify compliance with established industry guideline(s) or conducted when 'unforeseen circumstances' arise related to NANP resources. The scope of a 'for cause' audit will be limited to the circumstances related to the cause identified. For cause audits can be initiated by the NANPA or by the appropriate regulatory authority."*

Norm Epstein, GTE, stated that the term "unforeseen circumstances" is vague and too open ended without examples. Mr. Caldwell responded that the WG discussed using examples, and that all of the examples they thought of were really foreseen -- it is difficult to give examples of things that are unforeseen.

Gilbert Orozco, SBC, noted that there is no discussion for companies that do not submit forecast or utilization data to the NANPA, which was part of the original problem in not getting accurate COCUS data. Failure to report data should be a trigger for something -- an audit, for example. Mr. Caldwell questioned whether that should be added to the definition, since it is a process issue.

Beth Kistner added that failure to provide COCUS data should result in non-assignment of the resource, not trigger an audit. Karen Mulberry added that the recent NANC recommendation in response to NPRM Paragraph 38 addresses some of these issues, as well as the NRO Report on the COCUS replacement tool, which also recommended similar changes going forward. In practice today, however, there is no automatic denial of assignment of NANP resources for not submitting COCUS information.

There was discussion on whether the definition should remain broad or be narrowed to cover specific matters. Other issues addressed were the need for an explicit statement that there is a reason for the audit (to distinguish for cause from random audits); what entities are included in "appropriate regulatory authorities"; who pays for the audits; what guidelines will compliance be measured against; and whether the auditor can seek information from resellers/end users.

There was additional discussion on NANPA's role in determining whether there has been a violation and thereby triggering an audit, and on states' ability to trigger an audit. Vince Majkowski stated that states can initiate show cause audits, and that the industry should not try to narrow the definition in a manner that takes away the states' regulatory

responsibility for the public interest. Colorado subpoenaed information, and it worked. Utility commissions have that responsibility and will exercise their audit responsibility.

In response to a concern raised, the IMG agreed to clarify that the audits will only address numbering issues. The role of the auditor is to verify data – what the service provider reports and that the end user got what it asked for. Chairman Hoffman stated that the document gives states the right to ask for an audit, which they will use to get information to supplement a broader state proceeding. Karen Mulberry added the WG was trying to address is the situation in which carriers are obtaining resources without the appropriate state certification. For a for cause audit, NANPA must first suspect something.

Shawn Murphy commented that the framework document is a good document and should be forwarded to the INC. The Council agreed to finalize the document at the next meeting. Comments and suggested edits are to be sent to the OS WG Co-Chairs by October 15, 1999.

E.   NANPA Interim Audit Process Results. Ron Conners, Director, NANP Administration, provided the report to the Council. Bell Atlantic volunteered to be one of the first service providers for the trial audit. The trial attempted to get service providers to volunteer from each industry segment because each industry segment manages its resources slightly differently. The results of audit are confidential; the point was to learn more about creating an audit program. NANPA looked at 5 NPAs with 21 recent code requests to verify the existence of the Months-to-Exhaust (MTE) forms. Results are confidential and may be shared with regulators, but in general audit data is not made public. There were no penalties to be levied in the trial audit process. Chairman Hoffman questioned whether an officer of the company was present. Dan Hochvert stated that since this was a trial audit Bell Atlantic did not have an officer present.

Beth Kistner asked whether NANPA was able to establish a cost for the audit based on the length of time required. Mr. Conners responded that it would be very hard to predict, adding that auditing is a labor-intensive process. With respect to staff estimates, it required one staff month of Ron Conners and Bruce Bennett to conduct the audit. Switch data could be used to substantiate number utilization, which was not part of this trial audit.

F.   Number Resource Optimization (NRO) Working Group Report. Mike Whaley, Co-Chair, presented the revised report on reserved telephone number reservations. The modifications as directed at the last NANC meeting were incorporated. Dan Hochvert, with Ron Havens, Bill Adair and Philip McClelland, worked the issue, and provided a document that recommends a threshold of 30 reserved numbers for mandatory customer notification.

Beth Kistner asked whether there is data on how many existing reservations are for 30 or more numbers. Dan Hochvert responded that the majority of reservations are for a few numbers, and that reservations for less than 30 numbers have been easily resolved. Ron

Binz stated that the discussion was going off course; the Council had not yet agreed to set a threshhold. He added that the intended purpose of a LEWA was to reduce the number of problems associated with the porting of reserved numbers to another service provider, not consumer protection. Dan Hochvert commented that the intent was to make sure customers were protected and to reduce administrative burden. Tracking of all reserved numbers should be a priority for all service providers from business standpoint. The limit on reserve numbers per customer is by NPA and further delineated by NXX. Chairman Hoffman called the question of setting the threshold level at 30. There was consensus to modify the report accordingly. Sprint opposed a notification requirement at any level; SBC and MCI WorldCom opined that all customers should be notified. The characteristics for reserved numbers will be added to the report. The policy will be effective going forward and for existing number reservations. The NANC will forward the report to the INC Moderator with a cover letter. The report will also be forwarded to the Chief, CCB for information and will be filed with Office of the Secretary as an *ex parte* in CC Docket 99-200.

G.   *Reseller and Type I Wireless forecasting and utilization data*. Vince Majkowski, NARUC, presented the report to the Council. A position statement was developed on this issue by Gilbert Orozco, Karen Mulberry, Peter Guggina and Norm Epstein and e-mailed to Council members prior to the meeting. Paragraph two of the statement was read into the record:

> *The code/block holders to whom the numbering resources are assigned shall be responsible to report the name and contact information to the NANPA of any reseller/type 1 wireless carriers who have obtained numbering resources of more than 1,000 per NXX. The reseller/type 1 wireless carriers shall then be responsible to report their utilization and forecast data to the NANPA directly; unless otherwise specified in an interconnection agreement, business arrangement, contract or tariff."*

TRA was not involved in this recommendation. Terry Monroe, CompTel and Beth Kistner, suggested that the obligation to report number utilization and forecast data could be limited to reseller/Type 1 wireless carriers who have obtained individual blocks of number of more than 1,000 per NXX. After some discussion the Council agreed to edit the statement to add "of more than 1000 per NXX" at the end of the first sentence. Norm Epstein commented that the recommendation is in concert with the recommendation proposed by the INC, which places the reporting obligation on the user of the resource. Mr. Majkowski added that categorizing the numbers as "used" is considered utilization as well as forecast data. Trent Boaldin commented that the INC asked NANC to clarify the reseller obligation and that the report does this. If they have questions they will come back to us at a later time. It was agreed that the recommendation would be forwarded to the INC Moderator.

H.   *Local Number Portability Administration (LNPA) Working Group Report.* Charles Ryburn, SBC, Co-Chair, and Shelly Shaw, Ameritech, Co-Chair, presented the LNPA WG Report. Anna Miller, BellSouth Cellular, presented the Wireless Number

Portability Subcommittee (WNP SC) Report. Ms. Miller first reviewed the key issues addressed in the most recent WNP SC meeting in September 1999. The Test Plan sub-working group met for three days and identified 90 inter-carrier test scenarios in an attempt to define inter-carrier testing areas for implementing wireless number portability. The reseller options issue was closed with no change to the current porting process, in which resellers port subscribers through their facility based provider. In addition, Anne Cummins, AT&T Wireless, was elected WNP SC Co-Chair. The WNP SC also reviewed Network Interconnection Interoperability (NIIF) Issue 0130 and agreed to monitor and to update as needed the NIIF LNP guidelines to incorporate wireless LNP.

The following action items were reported on: (1) standards overview for T1S1.6, TR45.2, and T1P1.5 committees -- the missions, scopes, published standards, and work plans of these committees will be distributed to members prior to the October meeting; (2) continuation of the Inter-carrier Test Plan development; (3) Operations and Billing Forum (OBF) activity addressing directory listing requirements in an LNP environment; (4) liaison letters for test coordination were sent to the Regional Operation Teams, updating the Wireless Number Portability Timeline for completing inter-carrier test coordination plans, and including the WNP SC's recommendation for the inter-carrier communication process; and (5) Co-Chair elections -- Anne Cummins was elected. Chairman Hoffman stated his belief that NANC approval is not necessary for selection of task force or subcommittee chair positions, only for working group level chair positions.

Anna Miller gave the WNP SC status report updates. Item one reflects continuing work on the inter-carrier test scenarios. Item three regards the standards overview presentation in the October WNP SC meeting. Item nine, a newly added item, concerns WNP SC monitoring of NIIF LNP issues and guidelines, and contributions to the NIIF, as needed, to reflect decisions that affect wireless number portability implementation.

Mr. Ryburn continued with the LNPA WG Report. The LNPA WG has developed a LNP Problem Identification Management (PIM) Process advisory letter that was sent to the NANC, and will be sent to the NIIF, OBF, Committee T1S1.6, the Regional Operation teams, the LLCs, INC, and ATIS. The advisory was prepared to reflect the NANC's recommendation regarding the PIM process. It includes items for which the LNPA WG is and is not responsible. The advisory also explains the process for submitting issues electronically using hyperlinks. In addition, the advisory includes the LNPA WG meeting schedule for the remainder of 1999, copies of documentation contained on the Issues web site (e.g., LNP PIM Scope, the Issue Submission Form), and a hyperlink to the LNPA WG issue tracking matrix.

Beth O'Donnell, NCTA, asked whether the LNPA WG has established time frames for the evaluation, resolution, and referral of issues. Mr. Ryburn replied that the LNPA WG needs at least two weeks prior to the LNPA WG meeting to address an issue. Ms. O'Donnell expressed concern about the delay that is often encountered in resolving problems that occur daily. In one instance, the issue had not been resolved, and instead had just been referred to the LNPA WG. Ms. O'Donnell stated that the ideal situation would be to have issues resolved within a certain time frame, and that she did not want to

see the LNPA WG to become a dumping ground for issues that other groups did not want to resolve. Mr. Ryburn concurred and stated that he would ask the LNPA WG to develop a time frame for resolving issues. Ms. Shaw added that an issue will be considered closed after three meetings if the party responsible for raising it does not continue to provide information concerning the issue or is not present to address the issue. To prevent issues from being dropped inadvertently, Ms. Shaw stated that the issue tracking matrix forms will be posted on the web site, where they can be viewed and/or updated by any entity.

Trent Boaldin, OPASTCO, stated that Ms. Shaw's description of the process raises concerns for small companies since an entity that raised an issue may not be able to attend all the meetings during which that issue is addressed. Ms. Shaw responded that PIM is now a standing agenda item with a fixed starting time and call-in number so smaller companies can fully participate, or can have a stand-in to champion their issue. Mr. Ryburn replied in the affirmative to Ron Havens', Sprint, question whether other forums, such as NIIF, would receive the advisory. Norman Epstein, GTE, suggested that the location and call-in number be publicized. Mr. Ryburn noted that such items would be posted on the Issues web site, and reiterated that the advisory will be sent to the NIIF, OBF, Committee T1S1.6, the Regional Operation teams, the LLCs, INC, and ATIS this week.

Beth Kistner asked how the advisory would be delivered to carriers that do not participate in wide-spread forums. Mr. Ryburn stated that the LNPA WG had not addressed that issue and could look into it. Paul Hart volunteered USTA's services to assist with dissemination of information, if necessary. It was also suggested that a link to information could also be posted to the NANC web site, but care must be taken to avoid confusion about the origin of a document.

Mr. Ryburn presented the Wireline/Wireless Integration Report portion of the LNPA WG Report. At the August NANC meeting, GTE brought in a contribution expressing concern about E911 and slamming problems connected with the alternative to shorten the wireline to wireless porting interval. The LNPA WG decided to accept the report in last month's meeting, but with the caveat that the LNPA WG would continue to examine the E911 issues raised by GTE. The LNPA WG will deliver a revised report to the NANC by second quarter 2000. This is due to the prioritization of change orders and the requirements development for release 4.0.

Dan Hochvert, Bell Atlantic, asked whether the E911 issue only concerns accelerating the porting interval, and not all other potential E911 problems. Mr. Ryburn replied affirmatively and stated that the E911 concerns are caused by the period of mixed service, where the wireless phone has been activated, but the wireline phone has not been disconnected. Mr. Ryburn stated that if the phone is disconnected on the wireline side at the same time it is connected on the wireless side, then there are no problems. Mr. Hochvert suggested that the real problem is that some wireline carriers cannot yet shorten the porting interval to less than four days. Mr. Ryburn replied that the real problem is

activation in the NPAC before complete disconnect in all operating systems of the wireline carrier.

Mr. Ryburn continued with the LNPA WG report presentation. The LNPA WG previously recommended to the NANC that a Y2K quiet time be established from 11/1/99 to 3/1/2000 for NPAC/SMS release. LNPA WG members expressed concern about the ramifications of the quiet period. Notably, since new service providers would only be able to access the NPAC via dial-up to the LTI or through an existing service bureau's connectivity, this would limit the ability of new service providers to implement and test any new connectivity during the quiet period. Gene Johnson, LM, clarified that the NPAC would be able to work with any new provider requiring connectivity or testing during the quiet period as long as the carrier did not require any hardware installation and did not perform any software upgrades to the current system that would invalidate Y2K testing.

The LNPA WG has begun change order prioritization for Release 4.0, and will begin to develop change order requirements over the next few months. Anne LaLena, MCI WorldCom, reported that the Southwest LLC expects to attempt to vote on Release 3.0, already approved by one LLC, at its October meeting. The pooling activation problems that were encountered with the installation of Release 2.0 in the Mid-West Region were not caused by a lack of regression testing, but were mainly related to the lack of detailed Methods and Procedures (M&Ps) and problems with status updates. These issues are currently being addressed. Ameritech identified three areas of the installation process that needed updates: (1) Lack of status updates, (2) SP regression testing, and (3) pooling activations. These three steps noted in the NPAC/SMS Release Status Report will be added to the Status Update project plan.

Paul Hart asked what entity coordinates the upgrade to the new release. Mr. Johnson stated that there is no oversight project person. Mr. Johnson also noted that, previously, the pooling M&Ps were not coordinated with NANPA release implementation guidelines, but this has since been remedied, and pooling is no longer done at the same time a release is implemented. Discussion of the issues concerning the consolidated management team and Statement of Work 15 was deferred until the Wednesday, October 20, meeting.

Regarding the majority of the LLCs not accepting Release 3.0, Anne LaLena stated that, even after consolidation, there is no guarantee that the other 4 LLCs will accept Release 3.0.

Steve Addicks, MCI WorldCom, presented the Slow Horse report to the Council. Second drafts of two Local Service Management System (LSMS) requirements have been completed. NPAC modification is required in order to monitor and measure LSMS availability. This and other change orders being considered for Release 4 will be addressed in the next LNPA WG meeting. For the LSMS performance requirement, the speed of telephone number (TN) broadcasting to LSMS during NPAC processing of ported number activation is needed. The Northeast LLC requested this information from the NPAC vendor, which has provided a statement of work. Also, the NPAC vendor is

considering whether it is appropriate to release this possibly proprietary information to a public forum. The Slow Horse Subcommittee has also considered an alternative to the peak LSMS performance requirement, which involves an NPAC modification to smooth the rate at which ported TN information is broadcast. This NPAC modification is not trivial, however, and may not be the best approach.

September 29, 1999

I. Paragraph 165 IMG – CC Docket 99-200 Final Report. Tony Pupek, USTA presented the report to the Council. The IMG focused on the effect of pooling during its conference call. Chairman Hoffman asked whether the IMG proposed sending the entire document to the FCC. Mr. Pupek responded that the report, which contains two sections, could be sent to the FCC in its entirety

Chairman Hoffman noted that paragraph 165 is a little confusing, but seems to be asking for NANC input in the form of general comments on pooling, and specifically on CMRS. The first section of this report shows NANC's general support for pooling, and the second part goes on to show wireless pooling issues. The comment period is closed, but the feeling is that these issues are too important to remain silent on. It was suggested that the report be provided to the FCC as late filed or as an *ex parte* so that the Commission has the NANC view on this matter. Vince Majkowski stated that NARUC did not provide direct input to the IMG report, but is willing to accept this as a compromise position. Mr. Majkowski further noted that with regard to LNP and non-participation in pooling, lots of state initiatives have been to do pooling and sequential number assignment in areas outside the top 100 MSAs.

Norm Epstein added that Section II.B recommends further refinements or embellish-ments to the NANP Exhaust model. Chairman Hoffman stated that the NANPA Exhaust model should be considered a work in progress; we need to refine the assumptions as we look at results, and keep refining the model as we know more. A formal NANC action item to tell NANPA to keep refining the model does not seem necessary. Mr. Pupek expressed concern that there was no schedule or prioritization to look at these items -- enhancements to model, additional modules, etc.

Paul Hart, USTA, suggested that it is extremely important that NANC have an ongoing, formal interaction with LM on those activities. Chairman Hoffman suggested that he personally could work (within the next 30 days) with NANPA on these issues. That is, find out what they are doing, what progress is being made, what is the schedule they are operating on and what are their goals. The feedback on those questions could be part of the standing NANPA report to be provided by John Manning at the October meeting. There was no objection to this suggestion. Tony Pupek added that the message should be clear that the industry and NANC want to work with LM on the Exhaust model and come to agreement on the model.

Beth O'Donnell, NCTA, suggested that the report address an issue raised in correspondence from the Council to the Chief, Common Carrier Bureau in 1997, which

sought guidance on defining the term technology neutral. In response to this issue, some Council members opined that paragraph 165 does not deal with the technology neutral issue.

Lolita Smith, CTIA, stated that the FCC does not know what the technical effect of CMRS non-participation on exhaust of the NANP is and that is why the question was raised, *i.e.,* what is the effect of such non-participation on the life of the NANP. The final IMG report document answers the FCC's question. After some discussion, the Council decided not to address the issue of technology neutral in this report.

There was additional discussion on whether to send the entire report document forward as is or modify it by eliminating the suggestion of further work on the NANP Exhaust model. Ron Binz, CPI, recommended that section II.B not be included in the report because it was unsolicited and that it appears to undercut section II.A to some extent, and that NANC should recast the report and simply report on what the Council agreed upon. Chairman Hoffman disagreed, having sat in on some IMG conference calls, stating that it is relevant because the content of section II.B does modify II.A.

Chairman Hoffman noted that the NANC discussion is similar to the downward spiral that the IMG faced. Paragraph 165 is like the Bible -- you can find support for whatever you want to find. Diane Griffin Harmon, DFO, offered that the entire report would be helpful to FCC. In light of the discussion and FCC comment, the Council reached consensus to send the entire report to the FCC.

J.   Report of the Cost Recovery Working Group. Anne La Lena, Co-Chair, presented the report to the Council. Elsa Morris, Ohio PUC was selected as CR-WG Co-Chair, replacing Frank Meeks, SBC, and was affirmed by the Council. Cost recovery for audits that are not "for cause" audits will be funded by the NANP recovery process. There was some discussion regarding whether the entire industry should pay for "for cause" audits under NANP funding factor.

Chairman Hoffman stated that the goal is to develop a cost recovery recommendation, which requires an audit framework as a first step. Shawn Murphy commented that with respect to carrier audits, INC will not deal with associated costs -- only guidelines for conducting such audits.

Ms. La Lena stated that the CRWG is reviewing past and present audit work and will go to NANPA OS and Audits IMG for guidance and to make clear that no conclusion has been reached. She further stated that anything new requiring funding in the Year 2000 that is not part of the Requirements Document is considered an enterprise service. Chairman Hoffman suggested that the CRWG come back with a high level recommendation on the categories of costs associated with such audits at the October meeting.

NBANC Report. Vince Majkowski provided the report to the Council. At the August NANC meeting, Mary Pat Brennan, NECA, reported that a letter would be sent to all

carriers explaining the change in revenue reporting and the funding process for Year 3. A full update on this matter will be provided to the Council at the October NANC meeting. The matter of random audits will have to be considered in the funding factor.

The fund status financials were read into the record. The current fund balance is $1.43 million; projected receivables total $1.2 million, with payments to LM to date total $2.14 million, with remaining payments totaling $2.14 million. Payments to NECA total $129K to date with remaining payments totaling $128K. Board expenses are $8,638; this includes member reimbursement of $6,248 and meeting expenses of $2,390. Payments to an external auditor, Price Waterhouse Coopers, to date are $19.2K, with a year two projection of $22K.

Chairman Hoffman provided an update on the LLC conference call that both he and FCC staff members attended. During the call it was announced that as of November 1, 5 LLCs will be merged into one. The first meeting of the newly consolidated LLC will be held on November 11th. However, regional NPAC contracts will still be maintained separate. With respect to SOW 15 and Release 3.0, only one of the 5 LLCs have adopted it. It was reported that this will be one of the issues the consolidated management will deal with quickly. Chairman Hoffman suggested that NANC send a letter to all 7 LLCs recommending adoption of SOW 15 and seek an explanation as to why or why not approval has not been granted.

K. ***Industry Numbering Committee (INC) Report***. Shawn Murphy, AT&T, INC Moderator, presented the INC Report to the NANC. Initially, Mr. Murphy covered the report overview listed on page two. Page three of the INC Report contains a list of INC meetings held since the last NANC meeting. A full-session conference call was held August 30, 1999, during which ten issues were closed, mostly concerning thousands-block pooling administration guidelines. On September 10, 1999, a partial-session Carrier Identification Code (CIC) conference call was held to address CIC treatment with partial acquisitions. In addition, a full INC meeting was held September 13-17, 1999, in Portland, Oregon.

Page four of the report summarizes the LNPA Workshop activity at INC45. Two new issues were introduced, the most significant to NANC being GS-147, which is the action item from the NANC to INC to synchronize the guidelines with the agreements reached by the "1K Bid-IMG" team. The Thousand Block Pooling Administration Guidelines will be reissued in December 1999. An interim LNPA Workshop is scheduled for October 26-27. Page five of the report lists three LNPA Workshop issues that moved to final closure.

The first Audit Workshop meeting was held at INC45 on September 16, 1999. Page six of the INC Report contains a mission definition, and page seven contains the Audit Workshop scope. The Audit Workshop will provide future reports to the NANC on an as needed basis, such as when a policy issue is encountered. Page nine of the INC Report contains an agreement reached by participants that the frequency of audits for all numbering resources is beyond the Audit Workshop's scope because the INC does not

address policy or cost issues. Page ten of the report contains the INC Meeting Schedule and Logistics for the remainder of 1999.

Norman Epstein, GTE, suggested that the NANC develop guidelines for performing audits, especially addressing frequency and cost recovery issues. Chairman Hoffman noted that the Cost Recovery Working Group has already been tasked to examine such issues for NBANC. Beth O'Donnell questioned whether a formula exists to calculate the cost of audits based on a given frequency. Without a set methodology and concrete data, then costs can not be determined accurately. Peter Guggina, MCI WorldCom, suggested the need for professional advice to determine the size of the universe and frequency of audits needed. Carl Hansen, Omnipoint, concurred, and suggested the Cost Recovery WG be supplied with a set price for audits, and asked to determine how many audits can be performed for that price. The NANC, not the INC, however, will determine the frequency of audits.

Dan Hochvert suggested random audits could be performed in order to influence other carriers' behavior concerning numbering resources. Anne La Lena suggested that the Cost Recovery WG could give a "best" estimate of the number of audits possible for a given dollar amount. In response to Chairman Hoffman's question abut whether the WG will consult with accounting firms, Ms. La Lena answered that the Cost Recovery WG will obtain more information on audit procedures and scope from the NBANC auditor. Norm Epstein expressed concern about the difficulty of drafting guidelines and determining costs without knowing what an audit entails and how many will be performed. Chairman Hoffman concurred, but said that, nonetheless, an attempt must be made.

Peter Guggina suggested that the Cost Recovery WG is perhaps unnecessarily working on audit requirements, which are the IMG's purview, rather than working solely on cost recovery. Chairman Hoffman concurred. Mr. Guggina stated that the INC should determine the frequency and scope of audits and questioned when and how the shifting of duties occurred. Mr. Guggina suggested that the Audit IMG is more qualified to determine the audit performance requirements. Chairman Hoffman noted the apparent overlap between the two groups.

Paul Hart noted that the NANC will make the final decision and the Cost Recovery WG has volunteered to provide the first input. Shawn Murphy expressed support for Peter Guggina's position, but also supported Chairman Hoffman's suggestion that the IMG and the Cost Recovery WG could work together. Chairman Hoffman asked Ann La Lena to communicate the Cost Recovery WG meeting schedule to the IMG. Ms. La Lena stated that any estimates the Cost Recovery WG makes will only be at a high level, and the WG will work with the Audit IMG.

With respect to NANP Expansion, the INC received a letter from Canadian Radio-Television and Telecommunications Commission (CRTC) dated August 13, 1999, regarding the INC NANP expansion activity and requesting that INC consider examining the network destination code (NDC) options and perform a detailed analysis. Mr. Murphy stated that INC will address the request at INC 44 and will provide an interim

expansion report and update to the NANC at the December NANC meeting following the INC November NANP Expansion workshop. For information, a soft copy of the CRTC letter will be provided to all the NANC members by e-mail.

L.   Steering Group Report. Vincent Majkowski, SG Co-Chair, provided the report to the Council. With respect to the status of the LM Warburg transfer, Diane Griffin Harmon, DFO, noted that the Commission is continuing to work on this matter and expects to release an order in the very near future. There was a discussion concerning the NRO WG assignments. At this time there are no further assignments pending. Beth O'Donnell requested consideration of a future role to monitor number pooling, and to investigate UNP and ITN. This led to further discussion for the possible restructuring of NANC and its working groups and the use of IMGs versus standing working groups. The SG members were asked to provide input as to the roles of each group to see if there is any way to increase the efficiency of the organization.

The NANC 2000 meeting schedule was approved; meetings will be held on the following dates: January 18-19; February 22-23; March 21-22; April 25-26; May 23-24; June 20-21; July 18-19, September 19-20; October 17-18 and November 28-29. There will be no meeting held in August or December 2000. The schedule will be posted to the NANC web page at fcc.gov/CCB/Nanc.

With respect to technical and administrative support for the NANC Chairman, Bonnie Baca is investigating setting up a Chairman's web page. The web page will provide a central place for working group reports and documents that must be available for NANC member review in advance of the NANC meetings, and will contain links to the other related web sites. The SG should conclude this matter at its next meeting and will report the result to the NANC thereafter.

Chairman Hoffman introduced the idea of a public relations type campaign as a way for the Council to articulate the challenges facing the nation regarding number administration and the disruption of area code relief. As an aside, Chairman Hoffman reported that the United States is not alone in the numbering crisis matter – that England is now going through a third revamping of its entire number administration system. The SG was asked to consider the initiative in light of the Yog Varma presentation at the PCS 99 conference.

There was some discussion on the appropriateness of the NANC undertaking such an effort. Dan Hochvert supported the concept stating that the public is not as aware as the industry of this crisis and that it is not too soon to get started. As individuals, NANC members and their respective organizations have opportunities to spread the word. We know what is going on and the public does not understand. The public would be more receptive to changes if it fully understood what is going on. Trent Boaldin, OPASTCO, stated opposition to a NANC PR campaign, adding that educating the public is a carrier issue and association issue.

Chairman Hoffman referred to the New York Public Service Commission letter of September 15, 1999 to the Chief, Common Carrier Bureau, which states its objection to the NANC position regarding the rate center splitting matter in Minnesota. The letter asserts that NANC took an academic approach to the issue and did not consider the real life situation facing PSC's -- keeping their constituents happy. The Chairman further opined that this enforces the Council's need to consider its responsibility to educate the public. It is important that the message is consistent. Several members agreed that there is a need to heighten the public's awareness of the numbering crisis.

With regard to assignments of UNP and ITN to the NRO WG, Shawn Murphy, AT&T, stated that the INC has accepted an issue to work UNP, but does not want to impede its work on 1k pooling. A contribution from BellSouth and BellSouth Cellular has been accepted. Dan Hochvert suggested and the Council agreed that Beth O'Donnell should provide a proposed NRO work plan outline for consideration by the SG and the full NANC at its next meeting.

M.   *Proposed Recommendation on NPAC Oversight Responsibilities.* Dan Hochvert, Bell Atlantic, provided a proposal to the Council. The recommendation suggests that the LLCs should designate a person to keep NANC updated on its activities. Peter Guggina also provided a contribution which de-emphasizes the LLCs and shifts the focus to the NPAC. NANC has oversight for LNP and NANPA. NPAC feature uniformity is critical. Chairman Hoffman questioned whether the pending LLC consolidation would assist in this regard. Mr. Hochvert responded that there are 7 LLCs and one in Canada with which NANC has had no regular communication established and there is a need to get the dialogue going particularly concerning NPAC feature enhancements. Regular communication with the LLCs is long overdue. Carl Hansen added that with respect to feature uniformity and NPAC upgrades, oversight should not be minimized. Anne La Lena commented that the LLCs have in the past communicated to the NANC. NANC's oversight responsibility in the *Second Report and Order* was primarily for LNP implementation. Additionally, NANC has no authority over the Canadian LLC.

It was agreed that Peter Guggina and Dan Hochvert will draft a letter for NANC review to communicate with the LLCs concerning NANC responsibilities pursuant to the *Second Report and Order,* and to request that the LLCs report at the November NANC meeting regarding the status of SOW 15 Release 3.0.

N.   *Other Business.* John Manning advised that LM has developed a list of FAQs regarding number pooling in response to numerous inquiries on implementation of number pooling following the release the September 15th FCC orders delegating additional authority to four state commissions to conduct number pooling trials. Barry Bishop, LM, provided a brief overview of the content of the FAQs. LM has developed a separate web site, numberpool.com, to facilitate getting the information out to interested parties on the status of the Illinois number pooling trial and others. Mr. Bishop further explained that numbering pooling from an administration standpoint could be implemented in 2-4 months. This does not include the full range of activities necessary

for full implementation by service providers. The amount of time needed would vary greatly because no two service providers would have the same issues.

Paul Hart stated that the intended message may be misunderstood due largely to an imperfect understanding of number pooling and the status of NPAC upgrades. Mr. Bishop explained that pooling can be done with Release 1.4, which is now available in all regions. Release 3.0 is scheduled for June NPAC implementation and should be fully available by 3Q 2000. It will be released in the Mid-Atlantic region for testing at that time.

Carl Hansen stated there is a concern that states will think that number pooling is a way out of NPA relief planning. Mr. Bishop responded that indeed number pooling is no magic bullet and added that the effectiveness of number pooling will vary because no two NPAs are the same. Peter Guggina asked whether LM would accept comments and suggestions on the content of the FAQs handout. Mr. Bishop stated that LM would take all comments and suggestions that are offered.

Dan Hochvert asked about the status of the FAQs, expressing concern that some damage may have already been done. There is concern about uniformity of NPAC releases. The emphasis should be on a path forward with a national orientation toward pooling. Mr. Hochvert cautioned that the LM/NPAC should not underestimate its influence and suggested closer coordination on the dissemination of information. Chairman Hoffman added that the document presented is meant to inform the NANC and LM has stated it will accept changes. Mr. Bishop reminded the Council that the FAQs is a CIS product and represents a collection of factual statements made in response to questions received by LM.

Philip McClelland added that now that five states have been delegated authority to do pooling it is important to track and manage and/or monitor what is going on in each state. LM is talking to each state about the problems they will face. Chairman Hoffman stated that states are moving ahead, and CIS has to respond to their questions. The NANC needs to catch up, not slow CIS down by trying to control the content of its answers.

O. Next Meeting: October 19-20, 1999.

VI. NANC Action Items and Decisions Reached:

1. Report of NANPA on 1999-2001 NPA Assignments. LM accepts the responsibility under the fixed price contract to conduct initial meetings to coordinate NPA relief planning, but believes that facilitating any subsequent meetings for a particular NPA would constitute an enterprise service (for which LM would be compensated separately). Chairman Hoffman asked for the opportunity to review the contract, to research the issue with LM and some NANC members, and to report his findings at the October meeting.

LM will report on the status of CO code assignments in the 602 NPA regarding the "grandfathering" of codes in 602 for alarm companies with respect to the time provided for customer migration and the impact on code duplication.

LM will provide an update on the Minnesota three way split situation that splits rate center boundaries and provide the NANC at the October meeting with the number of NXXs available in those NPAs and report how many NXXs have been duplicated in order to maintain 7-digit dialing.

2. Report of NANPA Oversight Working Group. Working Group is to analyze the issue of repeated applications for NXX assignments occurring in some lottery conditions imposed by law and determine the associated consequences, such as increased cost to industry if the firm fixed price of the LM contract threshold is exceeded by 120%. Identify in what jurisdictions this is taking place, and identify the cost consequences.

Intellectual property. NANC recognized that the NANPA would be developing intellectual property of potentially significant value over the life of the contract with LM and that, accordingly, the NANC should resolve any confusion over ownership of that property. The NANPA OS WG will research the LM contract and define any conflicting positions, so that any open issues can be discussed at the NANC meeting in November.

3. Report of Audits IMG. Suggested changes to the Audit Framework recommendation are to be to be e-mailed to Pat Caldwell (pat.caldwell1@bridge.bellsouth.com) and Karen Mulberry (karen.mulberry@wcom.com). Comments with specific language changes are to be submitted by October 15. The IMG and NANPA OS WG will consolidate comments and produce a "redlined" version for review and discussion at the October NANC meeting. A consensus document will be delivered to NANC at the November meeting.

4. Report of the Number Resource Optimization Working Group. Proposed changes to the Report on Telephone Number Reservation were accepted. The final report will be forwarded to INC by transmittal letter. A copy of the report will be sent to the Chief, Common Carrier Bureau by separate transmittal letter. A copy of the report will be filed with the Commission as an *ex parte* for inclusion in CC Docket 99-200.

5. Reseller's Code Usage and Forecasting Reporting. The Reseller and Type 1 Wireless Forecasting and Utilization Data summary, paragraph 2, was modified to read as follows:

> *The code/block holders to whom the numbering resources are assigned shall be responsible to report the name and contact information to the NANPA of any reseller/type 1 wireless carriers who have obtained numbering resources of more than 1,000 per NXX. The reseller/type 1 wireless carriers shall then be responsible to report their utilization and forecast data to the NANPA directly;*

unless otherwise specified in an interconnection agreement, business arrangement, contract or tariff."

This report was approved as modified and will be forwarded by transmittal letter to the INC Moderator.

6. LNPA Working Group Report. With respect to the Problem Identification Management (PIM) process, the WG advisory letter will be forwarded to industry associations to ensure broad dissemination of the guidelines for the PIM.

7. Report of IMG Paragraph165. Report dated 9/15/99 was accepted and will be forwarded to FCC as late filed or *ex parte* of comments in CC Docket 99-200. Chairman Hoffman will interact and discuss issues contained in the report with LM. LM will report at October NANC regarding progress on improvements to the NANP Exhaust model.

8. Cost Recovery Working Group. Affirmed Co-Chair selection, Elsa Morris, Ohio PUC. With respect to audits, the CRWG will provide ballpark recommendation at the October meeting for the estimate of cost in Year 2000. The audit recommendation will include an estimate of reasonable expenses and the number of audits that will result. This will be a joint recommendation of the Audit IMG and the CRWG.

9. NBANC Update. Overall presentation will be provided at the October NANC meeting. Discussion will include the thousand-block administration true up effect on the funding factor. Further discussion of the audits issue will take place at the October meeting.

10. Industry Numbering Committee Report. INC will provide status of NANP expansion options (technical and policy) at the December NANC meeting. An interim report will be presented at the November NANC meeting.

11. Number Pooling IMG. IMG Chair Peter Guggina will work with LM/CIS to identify Year 2000 pooling cost and report at the October NANC meeting.

12. NANC Oversight of LLCs and NPAC. Letter to LLCs requesting information regarding their approval/acceptance of SOW 15, Release 3.0, will be drafted by Peter Guggina and Dan Hochvert for Chairman Hoffman and will be circulated to the full Council for approval prior to delivery.

13. Canadian Radio-Television and Telecommunications Commission (CRTC) Letter. NANC members will be provided a copy of the letter dated August 13, 1999, regarding CRTC request to INC that the network destination code (NDC) options be examined in detail as one of the NANP Expansion options.

14. Steering Group Report. Year 2000 meeting schedule presented and approved. Continue discussion on new replacement web site for Chairman's postings of NANC documents.

15. Other Business. Beth O'Donnell will develop a proposal for the NRO WG that includes a work plan for discussion at the October NANC meeting.