

North American Numbering Council

Meeting Minutes

October 19-20, 1999 (final 11.17.99)

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.	Dan Hochvert/Chuck Eppert	Bell Atlantic
3.	Terry Monroe/Jonathon Lee	CompTel
4.	Lolita Smith	CTIA
5.	Norm Epstein	GTE
6.	Peter Guggina	MCI WorldCom
7.	Gerry Thompson	Mobility Canada
8.	Jo Anne Sanford/Erin Duffy	NARUC
9.	Vincent Majkowski/Rebecca Quintana	NARUC
10.	Philip McClelland	NASUCA
11.	Natalie Billingsley	NASUCA
12.	Beth O'Donnell	NCTA
13.	Seth Jones	Nextel Communications
14.	Ray Strassburger/Art Dawe	Nortel Networks
15.	Trent Boaldin/Steve Pastorkovich	OPASTCO
16.	Harold Salters	PCIA
17.	Bill Adair	SBC
18.	Ron Havens	Sprint
19.	John Hoffman	Sprint PCS
20.	Gerry Rosenblatt	TIA
21.	Tony Pupek	USTA

Special Members (non-voting):

John Manning	NANPA
Maria Estefania	ATIS
Leo Mevel	CRTC

Commission Employees:

Diane Griffin Harmon, Designated Federal Officer (DFO)
Jared Carlson, Alternate DFO
Blaise Scinto, Deputy Chief, Network Services Division (NSD), Common Carrier Bureau
Les Selzer, NSD, CCB
Aaron Goldberger, NSD, CCB
Barry Payne, NSD, CCB
Patrick Forster, NSD, CCB

Tejal Mehta, NSD, CCB
Jeannie Grimes, NSD, CCB
Craig Stroup, Industry Analysis Division, CCB

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

IV. Documents Introduced.

- (1) Agenda
- (1a) September 28-29, 1999, NANC Meeting Minutes (draft)
- (2) North American Numbering Plan Administration Report
- (3) Beth O'Donnell Proposal re: Suggested Activity for the NRO WG
- (4) LNPA Working Group Report
- (5) Wireless Number Portability Subcommittee Report
- (6) WNPSC Status Report
- (7) Cost Recovery Working Group Update
- (8) NANC Contributions to the Audit Framework Document
- (9) NANC letter to Limited Liability Corporations (LLCs)
- (10) Frequently Asked Questions Regarding Number Pooling, revised 10/18/99
- (11) Table of NANC Projects/Activities, Contribution by Bell Atlantic, BellSouth, GTE, U S West and USTA
- (12) NBANC letter to NBANC Board of Directors, 10/8/99; NBANC Report
- (13) NBANC letter to All Telecommunications Service Providers, 10/15/99

V. Summary of the Meeting.

A. Opening Remarks. Chairman John Hoffman provided opening remarks.

B. North American Numbering Plan Administration (NANPA) Report. John Manning, NANPA, presented the NANPA report. In response to the issue of what entity is responsible for coordinating NPA relief planning meetings, Mr. Manning stated that an analysis of the Requirements Document and Lockheed's response indicated that the NANPA's obligation is limited to coordinating the first planning meeting, and to be available as needed for additional meetings. He stated that the industry could ask the NANPA to handle future meetings. Chairman Hoffman added that NANPA also must attend subsequent meetings but not call and facilitate those meetings, and that he read the Requirements Document to say facilitation of subsequent meetings would be an enterprise service. Peter Guggina, MCI WorldCom, stated that he agreed with the analysis, and recommended that the NANC reach consensus on the issue so that it would be in the record. He also noted his sympathy to SBC, which must coordinate the subsequent meetings.

Bill Adair, SBC, noted that there is general agreement that if a requirement is not in the Requirements Document, the NANPA is under no obligation to perform the duty. That being the case, the next Requirements Document should be written to ensure that the

industry gets what it pays for. Chairman Hoffman noted there was consensus that the NANPA facilitates the initial NPA relief planning meeting, but not subsequent meetings.

John Manning returned to the presentation. The NANPA has not updated or modified the NANP Exhaust Model. Chairman Hoffman stated that the Exhaust Model is a valuable, maybe indispensable tool for the FCC, and that the NANC should determine how much more work needs to be done to the model and how much the extra work would cost. There was further discussion of whether NANPA's contract requires it to update the model, and whether and how the NANP Exhaust Model could be improved. Issues raised included whether more time should be spent on expanding the NANP instead of improving the model; whether the NANPA looked at how long it would take to improve upon the pooling model, and whether other models should be looked at, *e.g.*, examining the effects of rate center consolidation on exhaust. Peter Guggina stated that a very comprehensive model that the FCC and the NANC could use is needed. Bill Adair noted that Lockheed had provided a model to use on an NPA-by-NPA basis to illustrate the effects of number pooling in a particular NPA, and questioned why this model was not being used more to determine whether pooling in smaller areas would help. Mr. Manning stated that the model is available at www.numberpool.com for use by the industry. Chairman Hoffman stated that he would meet with the NANPA before the November NANC meeting to discuss the issue further and to gain a better understanding of how the model works.

C. Number Resource Optimization (NRO) Working Group -- Draft Work Plan Discussion. Beth O'Donnell, NCTA, Co-chair, briefly discussed the draft NRO work plan. Ms. O'Donnell stated that there is currently no federal body that is charged with overseeing, monitoring, or coordinating the state pooling trials, and Unassigned Number Porting (UNP) has not yet been fully explored. The NANC is the logical body to this. In the waiver petitions, the FCC gave the states authority to stray from the pooling guidelines if they feel it is appropriate, as long as they get input from the industry and other states. Ms. O'Donnell stated that the NANC should be a clearinghouse for information on the pooling trials to facilitate policy recommendations to state commissions and ultimately to make policy recommendations to the FCC on the status of number pooling. Regarding UNP, Ms. O'Donnell stated that this issue arose in the context of the state waiver petitions; she was uncertain what technical reasons and limitations the FCC cited in rejecting ITN and UNP, and suggested that the NRO WG should complete a full exploration of UNP.

There was support from the California Commission for the proposed plan. In response to a question from Chuck Eppert, Bell Atlantic, Vince Majkowski, NARUC, stated that NARUC has no plans to monitor the state trials.

In response to a question concerning fill rates, Ms. O'Donnell responded that she advocates that fill rates be applicable for all NXXs, not just those that are being contributed to the pool. Mr. Guggina asked whether INC was already working on UNP, and what the NRO WG was planning to do differently with regard to UNP. Ms. O'Donnell replied that the INC had taken it on as an action item but had not worked the

issue. Peter Guggina stated that he would prefer having UNP dealt with in only one forum, and suggested changing the draft to allow INC to handle issues relating to UNP.

Tony Pupek, USTA, confirmed that INC has taken on the issue of UNP and that INC workshop meeting records reflect this work. Ms. O'Donnell responded that at the October NANC meeting, two different members of the workshop stated that work on UNP was not being done. Tony Pupek replied that the meeting records (available on the ATIS web-site) reflect the work that INC has done with regard to UNP. Ms. O'Donnell replied that, because UNP has not been a part of INC reports at the NANC, she did not know that issue is being worked at INC.

Bill Adair and Trent Boaldin, OPASTCO, agreed that INC should continue to work the UNP issue. Mr. Boaldin expressed his concern with the oversight role proposed for pooling, stating that if the FCC wanted the NANC to take part in oversight functions, it would have delegated authority in the state orders for the NANC to do so.

Additional concerns were raised regarding overlap with the LNPA WG's work on the development of Release 3.0 and the Illinois pooling trials. Ms. O'Donnell responded that there is no reporting to NANC for any of the state pooling trials, and that there is no real coordination or attempt at an analysis of the benefits of pooling at the federal level (NANC level).

Tony Pupek stated that tracking the state pooling trials is not a NANC function and that NARUC is the likely body to assume such an effort. Peter Guggina responded that NANC has overall responsibility for LNP implementation and that the NRO WG is well positioned to handle oversight as long as efforts are not duplicated. Vince Majkowski stated that the majority of the states do not fully understand the issues regarding pooling to be able to track them, and stated his support for the proposal as being very beneficial to the states.

Chairman Hoffman agreed that the NANC should know how the pooling trials are going, but expressed concern about the possible overlap of duties with the LNPA WG. He suggested that the LNPA WG and NRO WG meet to discuss their respective roles with regard to number pooling, and recommended that the NRO WG and INC meet to discuss the status of UNP. He further suggested that INC report to the NANC next month on the status of UNP. Mr. Pupek agreed, but stated that INC had not reported back to the NANC for the next two months because of its continued work on the thousands-block pooling administration guidelines.

Norm Eptstein, GTE, questioned the benefit to be gained from having one working group monitor the state pooling trials, and opined that it would be more beneficial to have the states report on their pooling trials. Several members agreed that monitoring information is needed, but that overlap of efforts should be worked out.

Terry Monroe, CompTel, stated that the NANC should help NARUC get information concerning the state pooling trials. Peter Guggina agreed, and suggested that coordination between the groups would eliminate any overlap.

Lolita Smith, CTIA, questioned what information the NANC expected to provide before the FCC issues its pooling order that would be helpful. Chairman Hoffman reiterated that the NANC has a primary responsibility to know the status of the state pooling trials. Beth Kistner echoed her support and suggested that it would be beneficial for the NRO WG to go through the tasks enumerated in Ms. O'Donnell's draft because both the NANC and the FCC would benefit from having a common set of data concerning the state pooling trials.

Vince Majkowski explained that NARUC could not address this issue until February 2000 with a resolution, and suggested that the FCC could direct those states that have been delegated authority to report to the NANC information concerning thousands-block number pooling. Joanne Sanford, NARUC, stated that information coming out of the state pooling trials would be beneficial to the NANC, the FCC, and to the states, and that the NANC should collect the information. Chuck Eppert, Bell Atlantic, agreed, adding that the NANC should merely pass on any information it receives from the state pooling trials, and refrain from passing any judgment regarding the trials.

There was further discussion on what group should do the information gathering for the pooling trials. Ms. O'Donnell explained that the NRO WG is the "point group" on numbering resource methodology, and thus should be delegated overall responsibility. Ms. Kistner also suggested that the chairs from the NRO WG meet with other chairs and report to the NANC at the November meeting regarding any overlap of duties.

Elsa Morris, Ohio PUC, indicated that the states, through conference calls, are sharing information on their individual efforts. Chuck Eppert suggested that the NANC should be part of the dialogue between the states taking part in pooling trials. Natalie Billingsley, NASUCA, concurred that the states are working together, but also stated that the states are individually focused on rolling out pooling.

Chairman Hoffman requested that Ms. O'Donnell take the following actions: (1) talk to the LNPA WG to eliminate any possible overlap of duties; (2) talk to NANPA to determine what information they are currently getting from the states; and (3) talk to the states to see what information is being shared. With respect to UNP, Chairman Hoffman suggested that Ms. O'Donnell work with Tony Pupek to determine what the INC is doing.

Several members sought clarification as to whether the Chairman was giving the work assignment to Ms. O'Donnell or the NRO WG. Ms. O'Donnell responded that she thought the Chairman was giving her the work assignment, not the entire NRO WG and reiterated that this was not a NRO WG proposal. Beth Kistner proposed that the authority be given to the NRO WG, and that the NRO WG should report back on a

proposed work plan. The Council agreed to allow the NRO WG to develop a work plan and report back at the November meeting.

D. Local Number Portability Administration (LNPA) Working Group Report. Shelly Shaw, Nextlink, Co-Chair, presented the report to the Council. Anna Miller, BellSouth Cellular, presented the Wireless Number Portability Subcommittee (WNP SC) report. Ms. Miller first reviewed the key issues addressed in the October 1999 WNP SC meeting. Regarding standards, T1S1.6, TR45.2, and T1P1.5 Number Portability committee representatives presented overviews of their mission, scope, published standards, and work plans. Wireless standards to support Phase 2 LNP for Call Completion to a Ported Number (CCPN) for both cellular and personal communications services (PCS) are complete. The wireless industry also discussed potential gaps in network, back-office, and provisioning requirements to support LNP. Specifically, the wireless industry needs to further analyze potential gaps with billing and call detail record requirements. The WNP SC also discussed the GTE NANC contribution on the Wireless Wireline Integration Report. Ed Gray, GTE, presented GTE's contribution for clarification and discussion. The WNP SC agreed on a preliminary recommendation to address slamming of pre-pay customers, which will be discussed at the LNPA WG.

Ms. Miller reported on the following action items: (1) The WNP SC continues to analyze potential wireless LNP gaps, and feels that wireless service providers should consult with their billing vendors to ensure that Call Detail Records provide information necessary for LNP. (2) The co-chairs issued a liaison letter to Alliance for Telecommunications Industry Solutions (ATIS) Committee T1 addressing Letter Ballots 803 and 804 (LB803 and LB804) on Local Service Provider Identification (LSPI) and Carrier Service Provider Identification (CSPI), respectively. The WNP SC will evaluate benefits and limitations of LSPI and CSPI relative to billing requirements. (3) The WNP SC continues development of the wireless LNP test plan. A conference call for the test plan group will be held October 22, 1999. This call will be used to set the meeting schedule and identify wireline and wireless subject matter experts to develop the network and provisioning test scenarios and descriptions. The goal is to have several meetings to complete the test plan, and wireline participation is welcomed.

Chairman Hoffman questioned whether the "gap" included anything critical. Ms. Miller replied that there is probably not anything critical, especially on the network side, but wireless service providers should take care to ensure that all information necessary for billing in a wireless LNP environment is included in the call detail record. Anything missing should be identified so appropriate standards can be proposed. Beth O'Donnell questioned whether there are other wireless LNP standards that are incomplete. Ms. Miller replied that network standards for call completion to a ported number are complete. ATIS Committee TR45, however, is still working on a standard for Short Message Service in a LNP environment, which is expected to be completed in the near term. Ms. Miller reiterated that service providers should determine what information is needed in their billing systems, and should speak with their billing vendors to ensure the required information is included in the call detail record and their switches will provision that information.

Vince Majkowski questioned whether the billing question was previously included in the Wireless Number Portability Implementation Timeline, which already extends to November 2002, and if any of the items currently in the timeline will be delayed further as a result of these issues. Ms. Miller replied that the timeline did not include the billing issues. To remain on schedule, service providers must begin internal testing by February 2001. For this to occur, functional system development must be completed by the second half of year 2000. Thus, any impacts due to billing issues must be identified and addressed now, so the timeline is not affected. Mr. Majkowski requested that these issues be included in the next version of the timeline. Harold Salters, PCIA, stated that the issues of billing and the call detail record were discussed in the most recent WNP SC meeting.

Ms. Shaw continued with the LNPA WG report presentation. Ms. Shaw reviewed the items contained in the LNPA WG report: (1) LNP Problem Identification and Management (PIM); (2) NPAC/SMS Release Status; and (3) Slow Horse Update. The next LNPA WG meeting is scheduled for November 8-11, 1999 in San Antonio, Texas. The PIM is currently working on two open issues, which are being tracked on the PIM open issues list. Regarding the status NPAC/SMS Release 4.0, change order prioritization and business need development have been completed. The LNPA WG will discuss business need and prioritized change orders with the LLCs at the next WG meeting. Final selection of change orders for the release has not been completed, but the requirement's development should begin at the November meeting. For NPAC/SMS Release 3.0, the number pooling release, the Mid-Atlantic and Southwest LLCs have accepted the statement of work. The LNPA WG number pooling subcommittee has developed all of the NPAC requirements and has worked closely with the number pooling trial in Chicago to verify that the systems and procedures function properly, and to determine whether any updates from the LNPA WG are needed. For Release 2.0, the NPAC identified a defect related to the time stamp in the NPAC, for which a manual workaround is in place. The NPAC will implement a "fix" on October 31, 1999.

Regarding the Slow Horse Update, the Northeast LLC requested peak performance data from Lockheed Martin on behalf of the Slow Horse subcommittee, but Lockheed Martin responded that the data could not be utilized in a public forum. Currently, Lockheed Martin and the Northeast LLC are negotiating what data can be released to the Slow Horse subcommittee for use in requirements development. LSMS requirements work is progressing. The draft performance and availability requirements should be complete before the NANC's April 2000 meeting.

Tony Pupek, USTA, asked whether a Release 3.0 statement of work would be given to the NANC at the next meeting. Ms. Shaw replied that the number pooling subcommittee would provide the NANC with a "readout" on both Releases 1.4 and 3.0 at the next meeting. Regarding the PIM's two open items, Ms. Shaw stated that the first item concerns the proper process flows in a multiple service provider porting situation with resellers and network service providers, and the second open item concerns the establishment of a service provider window for LSMS and SOA maintenance.

E. Cost Recovery Working Group Report. Co-Chairs Anne La Lena and Elsa Morris, Ohio PUC, provided the report to the Council. In September, CRWG was asked to estimate the total dollar amount for NBANC to bill and collect for the Year 2000 NANP activities. Ms. La Lena clarified that this factor is to be used for 16 months, to accommodate the change the fiscal year from March 1st through February 28th FY to July 1st through June 30th.

The CRWG estimates that \$700,000 will be needed for Year 2000 audit activities. This estimate focuses only on audits of Central Office (CO) codes because this category includes the majority of numbers that are assigned. Ms. La Lena stated that this estimate was developed using high level assumptions based on limited knowledge of auditors' salaries, estimated time expenditure, and estimated scope. The "universe" of potential audit subjects, *i.e.*, SPs ranges from 1,500 to 3,000. Future funding estimates will be more specifically defined with regard to depth, scope and frequency. The CRWG has not examined the policy issue of who should pay for "for cause" audits.

The CRWG further recommends that the cost of random audits be assessed on all carriers. The \$700,000 estimate, once approved by the NANC, will be sent to the NBANC. In response to a question regarding the number of audits that would be conducted, Ms. Le Lena responded that the CRWG estimated that the NANPA would conduct 50 to 100 audits with this \$700,000 figure. Ms. Le Lena also explained that number of audits conducted will depend on the depth and scope of the audits.

Peter Guggina opined that the \$700,000 figure is too low, and thought it should be in the \$1 million range. Mr. Guggina also suggested that the Audits IMG should investigate this issue further. Beth O'Donnell opined that the \$700,000 figure was too high because half the year will have passed by the time the audit program would actually be implemented. Regarding "for cause" audits, Ms. O'Donnell stated that regulators should conduct them and the audited entity should pay for them. Chairman Hoffman asked whether the \$700,000 figure takes into account the fact that the audited carrier will pay for the for cause audit. Ms. Le Lena explained that the \$700,000 estimates the cost of random audits only.

There was discussion on whether the \$700,00 figure is appropriate, and whether the assumptions used to arrive at this figure were appropriate. Ms. Le Lena stated that there was agreement that the CRWG would not release the assumptions.

Peter Guggina opined that charging the audited carrier would discourage the development of a constructive relationship, and suggested that the issue of who paid for the audit needed to be resolved before the NANC could decide on a final figure. Chairman Hoffman suggested that the figure be accepted contingent upon the Audits IMG report recommendation on who would pay for "for cause" audits, and that the members vote on the final figure after the Audits IMG resolved this issue in its session later that day. The Council reached consensus on this plan.

F. Audits Issue Management Group (IMG). Karen Mulberry presented the Audits Framework document. Contributions were received from four NANC members, all of which were incorporated verbatim. The NANPA OWG will review the document to reconcile the comments with the rest of the document this month.

There was discussion on whether the Audits IMG should continue to exist. Ms. Mulberry, co-chair of both the Audits IMG and the NANPA OWG, identified the items being worked on by the NANPA OWG: follow up on action items from NANPA's performance review; development of the new Requirements Document and the Audits Requirements Document; and resolving the intellectual property issue. Ms. Mulberry indicated that the NANPA OWG could finalize the Audits Framework document for November.

There was discussion on the issue of who pays for "for cause" audits. Chairman Hoffman envisions a process where the NANPA would send a letter to an SP that, *e.g.*, files a monthly exhaust report with numbers that are out of line. The letter would indicate that the SP will be audited, and that if it fails the audit, the SP would pay for the audit. The SP could choose to correct the discrepancy, or take its chances with the audit.

Harold Salters, PCIA, opined that the audit process should not be punitive. Beth Kistner added that a punitive result would not be appropriate if very little bad behavior was found. Ms. O'Donnell expressed concern about creating an incentive for the auditor to do audits. Chairman Hoffman and Mr. Epstein pointed out that the auditor doesn't make the decision to audit, but carries out the audit. Mr. Epstein added that for cause audits should be a bright-line test to measure compliance with the guidelines and regulations.

Peter Guggina stated that having failing SPs pay for audits might be a big burden on small companies. For obvious wrongdoing, the problem should be brought to the attention of regulators. Mr. Guggina opined that the better long term strategy is not to penalize those SPs that fail an audit.

Chairman Hoffman suggested that the entire industry could fund audits for the first year, and the NANC could revisit the issue after having had some experience. There was further discussion of funding the audits, with most NANC members indicating a preference that the entire process, at least for the first year, be funded by the industry as a whole.

Chairman Hoffman suggested giving direction to the NANPA OWG to look at resolving the issue by funding costs for both random and for cause audits in the same manner for the first year. That is, the costs of all audits would be spread among all SPs using the NANPA funding formula.

The Council reached consensus that: (1) industry as a whole would pay for random and for cause audits for the first year; (2) the issue would be reconsidered in one year (*i.e.*, January 2001); and (3) the estimated cost of the audits for the first year is \$700,000.

October 20, 1999

G. Approval of meeting minutes. The September 28-29, 1999 meeting minutes were approved with minor modifications. Offline non-substantive edits were received from Dan Hochvert. Additionally, Gerry Rosenblatt, TIA, requested a change to the attendance roster to add TIA alternate Ben Walston.

H. Oversight of Limited Liability Corporations (LLCs) /Number Portability Administration Center (NPAC) Activities. A draft letter to be sent to the LLCs and the Canadian LNP Consortium, Inc., was circulated to the full NANC for approval. The letter requested a status report on the disposition of Statement of Work (SOW) 15, Release 3.0 and other future NPAC activities. The letter was approved for distribution.

I. Frequently Asked Questions (FAQs) Regarding Number Pooling. A revised FAQ on number pooling developed by MCI WorldCom, Cox Communications and Bell Atlantic was presented to the Council for discussion. The revised FAQ was developed in response to LM CIS's FAQ provided to the Council during the September 28-29, 1999 NANC meeting. Vince Majkowski questioned the appropriateness of the NANC changing the NANPA's FAQ document which is posted on their web site. The questions presented in the FAQ are those received by the NANPA, to which they have responded. Chairman Hoffman opined that efforts like this should be collaborative between NANC and the NANPA, adding that this issue should have been considered in more detail at the last meeting when it was first presented to the NANC by LM CIS.

The revised contribution document presents corrected answers, or rather more complete answers. Chairman Hoffman further stated that he did not believe the original FAQs and answers were wrong, but that LM was providing the responses from a very narrow NANPA perspective. The revised set of answers provides a broader industry perspective. One of the points of contention was the time needed to implement 1K block pooling. NANPA's answer of 60 days does not consider the amount of work that needs to be done by the industry, with regulators, consumers in the community, and in their switching offices. It is probably unreasonable to give the public the perception that pooling that be implemented by everybody in that short a period of time. That is one example of what these amended answers reflect.

Chairman Hoffman further stated the process of updating the FAQs should not take place at monthly NANC meetings, but the industry should be able to contact NANPA with information or suggested revisions at any time.

Vince Majkowski questioned whether revising the FAQs changes any legal responsibility for the NANPA. Chairman Hoffman stated he did not believe so. Mr. Majkowski expressed concern and unease over NANC revising the FAQs, a LM work product. Chairman Hoffman added that a way for NANPA to resolve this would be to put some type of disclaimer that the answers are given from NANPA's perspective only and reflect NANPA's knowledge of the facts. But this does not satisfy the primary purpose, which is to educate the public, consumers and others that are interested in these issues.

Tony Pupek, USTA, raised the issue that CIS provided the FAQs as a vendor on its Numberpool.com web site, but that the number administration requirements document requires the NANPA to provide these answers. The revised contribution was developed to reflect the NANPA position, not that of a vendor with the possibility of becoming the national pooling administrator. There was further discussion on whether CIS the vendor or the NANPA is providing the FAQs, and the need for consistent information regardless of whom is asking or responding to questions.

Chairman Hoffman stated that the record should be clear that these FAQs represent the NANC position on these issues, and that these are the answers that the NANC agrees the NANPA should give when asked these questions. It is important whatever entity is giving the answers that they are giving the same answers.

John Manning stated that LM has purposely over the last several months tried to separate the NANP administration activities from the interim pooling activities because the NANPA has not been ordered to provide pooling administration by the FCC. CIS will try to make sure industry and state regulators understand that they will get the same message regardless of to whom they are speaking. The NANC should give the CIS/NANPA staff an opportunity to review this input, seek clarification if necessary, and move forward on that basis.

Tony Pupek asked where the revised FAQ document would be posted. John Manning was not sure, but added that since there is no order concerning number pooling administration, LM thought it might be presumptuous to put this on the NANPA web page. Based on the input received today, however, LM will do so. It was agreed that November 1, 1999, would be the date certain for redistribution of the revised FAQs, if not sooner, to allow entities to provide edits and input to LM. Chairman Hoffman suggested that LM may want to highlight the FAQ information in its upcoming newsletter(s) and direct readers to the web site for a complete document.

Phil McClelland, NASUCA, raised some concerns over legal positions taken with respect the delegated authority and interpreting FCC orders. NASUCA was not ready to address those matters today, but did not want their silence to suggest acceptance on those points. Chairman Hoffman agreed that the Council should review the FAQs, and edits should be sent to John Manning, copying the FCC staff.

Vince Majkowski stated that he intends to distribute the Number Pooling FAQs at the November 6-11, NARUC convention in San Antonio to the Telecommunications Committee, as well as to the Board of Directors, so that the state commissioners can have the information.

J. Steering Group Report. Vince Majkowski, Co-Chair, SG provided the report to the Council. Regarding the working group and IMG restructuring proposal, the consensus of the SG is that IMGs can accomplish results more quickly because they are

more focused, and there will probably be increased use of them in the future. The SG agreed generally that IMGs should function from two to six months at a time.

The SG decided that the new NANPA requirements document should proceed under the NANPA OWG, however, no timelines were established. The NRO is to come back next month with a refined list of its issues. The audits framework document should proceed and final decisions should be made on who the auditor will be, the contracting requirements, and development of the request for proposal (RFP).

A contribution developed by Bell Atlantic, BellSouth, GTE, U S West and USTA was presented to the SG. The contribution is a table of NANC projects/activities to be addressed within the next 6 to 12 months. The table contains three columns – it lists the ongoing and anticipated projects, and recommends assignment to a group, and the third column is left blank for insertion of completion dates. The contributors asked the SG to identify any projects that were missed, and to e-mail any additions to apupek@usta.org. The table will be completed and brought back to the SG for further discussion.

There was no resolution of the issue of NANC and SG membership. The SG discussed the upcoming mergers and acquisitions, which will result in some members losing their seats on the NANC, noting some concern for maintaining balance and ensuring broad representation. FCC staff members advised that the Chief, CCB, is the decision-maker on NANC membership.

There was some discussion of the free numbers issue that was addressed in Chairman Hoffman's memorandum of September 8, 1999. Because of the concern generated by large requests for NXXs, the SG asked Phil McClelland to bring the issue back to the SG next month for further discussion.

Other items discussed included technical and administrative support for the Council. LM has agreed to develop a NANC Chairman's web page. The transfer of the accounting function from Frontier Communications to LM for the collection and distribution of funds for the payment of travel expenses of NARUC participants will take place within the next month or two.

Finally, the SG discussed Chairman Hoffman's public relations ideas. The Chairman reemphasized that the NANC and the industry at large, has a responsibility to educate its constituents on the exhaust of the NANP and what is being done to slow it down or change the direction.

K. Number Pooling IMG Report. Peter Guggina provided the update on the 1K bid process to the Council. Number pooling is a NANP function and should be recovered under the NANP funding factor. The new budget cycle of 16 months will affect the cost for pooling and appropriation. Therefore, a new number is needed for the cost of 1K block pooling for NBANC budgeting through June 2001. In order to do so, we need to anticipate when pooling will start. The assumption used is that national pooling will begin in January 2001. In addition, there needs to be an appropriation and cost recovery

for the NPAC transaction costs under the NANP formula, but the billing and collection process would be handled by LM. NBANC would handle the billing for 1K pooling administration. It was agreed that there would be no public disclosure of the cost at this time; the actual cost amount will be provided to NBANC by letter from the IMG Chair.

The larger figure presented in closed session is for up front systems development. The other numbers provided in the SG session are usage sensitive for blocks of numbers with guaranteed contract minimums. The one time charge will be budgeted in calendar year 2000. It was suggested that such a revenue requirement may require financing. Chairman Hoffman expressed concern for the development cost and asked whether it was possible to spread the cost out over time, questioning whether that was a decision for NBANC or for NANC to make. This was addressed in the NBANC report.

L. North American Billing and Collection Update. John Ricker, Chief Executive Officer, NBANC, provided the report to the Council. Mr. Ricker began by responding to the development cost question raised above, and stated that NECA administers several programs and that for each program he must take the revenue base and calculate separate amounts on separate bills. The NANPA function is by far the smallest fund; the second largest fund, TRS, is 10 times larger than the NANPA fund (approximately \$40 million dollars per year).

Dan Hochvert pointed out that the costs to which Mr. Guggina referred are only for number pooling administration costs and not the total cost to the industry for number pooling implementation. Typically, if there are milestones, companies “pay as they go.” Here, because the vendor is in the development stage, money will be collected in anticipation of later billing.

Norm Epstein questioned whether other NPAC-related costs will be budgeted for. Mr. Guggina responded that these costs will be billed by LM to SPs for the transactional costs of using the NPAC.

There was discussion of when the dollar amounts would no longer be deemed confidential and could be disclosed to the industry, but no decision was reached. Mr. Ricker continued with the NBANC report.

NANPA Fund Performance: The fund status financials were read into the record. The current fund balance is \$1.3 million; projected receivables total \$1.02 million, with payments to LM to date totaling \$2.5 million, with remaining payments totaling \$1.78 million. Payments to NECA total \$150K to date with remaining payments totaling \$107K. Board expenses are \$9,461; this includes member reimbursement of \$7,071 and meeting expenses of \$2,390. Payments to an external auditor, Price Waterhouse Coopers, to date are \$19,250, with a year two projection of \$22K. The next NBANC Board meeting is scheduled for November 18, 1999, at the International Trade Center (Reagan Building), 1300 Pennsylvania Avenue, NW, Washington, DC, beginning at 10:00 a.m.

NBANC sent a letter on October 15, 1999 to all carriers announcing the changes to the calendar funding year from March 1 to February 28 to a new cycle of March 1 to June 30, 2001 (a 16-month period). The FCC Form 496 was eliminated and replaced by a consolidated telecom reporting worksheet. This is a significant change to the process and to the funding base structure. A true up process will take place in May 2000. The revenue base used to report to USAC is based on 6-month end user-based revenues. Some carriers with revenues of less than 10K are not required to contribute to the NANP fund. Once revenues are received, there will be a true up to the NANP contribution factor, which may result in a modification after the initial 16-month period. NBANC has no plans or provisions to do any other sort of mid-year adjustment.

In discussing the audit cost estimate of \$700K, Mr. Ricker indicated that an increase of a million dollars to the budget would result in an increase of .000004 to the funding factor. The first year factor was .000022 and was reduced in the second year to .000020; NBANC is projecting the third funding year at 000025.

Mr. Ricker stated that many carriers pay their contribution up front in full and about 50 carriers pay on a monthly basis. Chairman Hoffman raised a concern that the number pooling administration development costs almost doubles the budget amount, and questioned whether the initial payment should be borrowed. Mr. Ricker explained that in the past, NBANC has not been successful in establishing a line of credit because NBANC does not have assets.

Peter Guggina suggested that the industry pay the number pooling administration up front costs in full and be done with it. Mr. Majkowski reminded the Council that NBANC cost are fixed and the addition of the audit function and 1K pooling matter must be added to the budget. Chairman Hoffman reiterated that the NANC has a responsibility to inform carriers of the amounts they will have to pay, and so the "confidential" dollar amounts will have to be disclosed.

Dan Hochvert stated that the FCC review process ensures fair dealing. Probably 93% of the industry is represented at this table, and each should go back to its constituency to explain the costs. The letter to NBANC should explain the changes in costs relating to pooling.

Vince Majkowski, NBANC, stated that any changes to the funding structure for pooling must be provided to the Board of Directors by the November 18. If additional cost for COCUS arise in the middle of the year, then the numbers can be adjusted in the May 2000 true up. If the FCC orders it sooner, NBANC will recalculate at that time.

Mr. Ricker further explained, in response to a question regarding the budget surplus, that NBANC experienced a surplus of \$800K in year one and consequently reduced the contribution factor for year two. NECA recommended to the NBANC Board of Directors that NBANC retain a surplus of \$400K.

Chairman Hoffman requested that Anne Le Lena, Co-Chair CRWG, draft a letter for the chair's signature to NBANC requesting the addition of \$700K to the amount to be billed and collected for fiscal year 2000.

M. Other Business.

Telephone Number Reservation Policy. Dan Hochvert, Bell Atlantic, asked what the trigger will be for implementation of the new reservation policy within our respective companies. Bill Adair added his concern that if internal procedures are modified now, they may be faced with changing procedures after the FCC issues its NPRM R&O.

Internet Conference Call/Meeting Demonstration. Peter Guggina announced an Internet conference call demonstration for interested members of the Council. This Internet meeting platform may be a useful tool for subgroups and IMGs to make the NANC more productive. Details about the demonstration will be sent out by e-mail and will include the user pass codes.

December NANC Meeting. Chairman Hoffman stated he would like to try to pack the agenda for November to minimize the December 14-15, 1999, meeting and possibly reduce it to one day – or eliminate it all together. The Council agreed to consider reducing or eliminating the December meeting, and possibly scheduling the one full day for Wednesday, December 15th. Final discussion on this matter will take place at the November meeting. Jeannie Grimes, FCC, will check on the availability of the FCC meeting room for the entire day (8:30 a.m. to 5 p.m.).

N. Next Meeting: November 16-17, 1999.

VI. Action Items and Decisions Reached.

1. NANC agreed to LM's assessment of its responsibilities under the Requirements Document that NANPA will facilitate the first implementation meeting after an NPA relief plan has been approved. NANPA will participate in subsequent meetings, but will facilitate them (as an enterprise service) only if requested (and compensated) by the involved industry participants.

NANC Chairman will meet with LM in November to assess the existing NANP Exhaust Model and the Pooling Model and report his findings at the November NANC meeting. Discussion will include COCUS as part of the model assessment.

LM agreed to provide the NANC with the time requirements necessary to make design changes to the Pooling Model as detailed in the IMG paragraph 165 report.

2. Number Resource Optimization Working Group. The NRO WG will refine the work plan introduced by Beth O'Donnell after discussion with:
 - The LNPA WG to determine what their activities are pertaining to the state pooling trials.

- NANPA to understand what role they expect to take in the collection of data and any monitoring activity of the state pooling trials.
 - States to determine how they expect to proceed in the collecting and reporting information associated with the pooling trials.
 - INC to determine extent of their work on UNP under Issue 177.
3. Local Number Portability Working Group. LNPA WG (WNPSC) should include the impact of the billing and Call Detail record management in their timeline toward November 2002.

The LNPA WG will provide NANC with a read out of Release 1.4 and 3.0 status relating to number pooling at the November meeting.

4. Cost Recovery Working Group. NANC agreed to add \$700,000 for NBANC to bill and collect for performing random audits during the fiscal year (March 1, 2000 to June 30, 2001). NANC Chair will send a letter to NBANC notifying it of this decision.
5. Audits IMG. NANC agreed that the Audits IMG is disbanded and the Audit Framework Document will be worked by the NANPA Oversight (NOWG) Working Group. The NOWG is to provide the NANC with a consensus document at the November NANC meeting.

NANC agreed to the following relative to for cause audits:

- They will be funded by the industry through the NBANC for an initial trial period.
 - The process will be reexamined in January 2001 to assess the funding decision (above) and make changes as necessary.
6. Lockheed Martin CIS Frequently Asked Questions (FAQ). NANC agreed to accept the revised FAQs dated October 18, 1999. NANPA was asked to post the revised version to its web site by November 1, 1999. NANC members were requested to provide input as necessary to the full NANC prior to the 11/1/99 date. NANPA also agreed to redistribute the revised Q&A as necessary.
7. Steering Group. The contribution listing NANC activities and assignments presented at the Steering Group meeting was considered to be a working document. The contributors will provide further input, namely “timeframes” at the next SG meeting. NANC members were asked to supplement the projects/activities list and should provide their input to the contribution to via e-mail to apupek@usta.org.

Pooling IMG Chair (Peter Guggina) will provide NBANC with the budget amount to be used in its calculations for the next billing period for the Pooling Administrator function. The amount is still confidential and shall be provided to NBANC accordingly.