North American Numbering Council
Meeting Minutes
November 16-17, 1999 – *Final 1.20.00*

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*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.	Dan Gonos	ALTS
2.	Ed Gould	AT&T Corp.
3.	Dan Hochvert/Jo Gallagher	Bell Atlantic
4.	Terry Monroe	CompTel
5.	Ron Binz	CPI
6.	Lolita Smith	CTIA
7.	Norm Epstein	GTE
8.	Peter Guggina	MCI WorldCom
9.	Javan Erfanian	Mobility Canada
10.	Jo Anne Sanford/Erin Duffy	NARUC
11.	Vincent Majkowski/Rebecca Quintana	NARUC
12.	Amy Putnam	NARUC
13.	Natalie Billingsley	NASUCA
14.	Philip McClelland	NASUCA
15.	Beth O'Donnell	NCTA
16.	Seth Jones	Nextel Communications
17.	Brad Baxter	NextLink Communications
18.	David Bench	Nortel Networks
19.	Carl Hansen	Omnipoint
20.	Trent Boaldin	OPASTCO
21.	Harold Salters	PCIA
22.	Bill Adair	SBC
23.	Hoke Knox	Sprint Corp.
24.	John Hoffman	Sprint PCS
25.	Gerry Rosenblatt	TIA
26.	Paul Hart	USTA

Special Members (non-voting):
John Manning	NANPA
Maria Estefania	ATIS

Commission Employees:
Diane Griffin Harmon, Designated Federal Officer (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 35 members of the public attended the meeting as observers.

IV.   ***Documents Introduced***. Each member received the following handouts:
(1)   Agenda
(2)   October 19-20, 1999 NANC Meeting Minutes (draft)
(3)   NANPA 1999 CO Code Assignment Activity Report
(4)   Philadelphia Inquirer Article: "Area Code Overload Leaves Philadelphia Telephone Unreachable"
(5)   NANPA Oversight Working Group Report
(6)   Revised NANC Audit Framework Recommendation
(7)   Draft Memorandum (1/2/00) Re: Input for NANPA Performance
(8)   Number Resource Optimization (NRO) Working Group Report
(8a)   Pooling Information Desired
(8b)   Draft Memorandum Re: Revised Work Plans for Pooling Monitoring and UNP
(9)   Draft Memorandum to Chief, CCB, Re: NPA Splits – 914
(10)   Local Number Portability (LNPA) Working Group Report
(11)   Wireless Number Portability Subcommittee (WNPSC), Key Issues & Action Items
(12)   WNPSC Status Report Matrix
(13)   Wireless Number Portability Timeline Phase 2
(14)   LNPA Pooling Subcommittee, Number Pooling Report
(15)   Cost Recovery Working Group Report
(16)   Industry Numbering Committee (INC) Report
(17)   Unassigned Number Porting (UNP) Status Report
(18)   NANC Ad-Hoc 1K Pooling IMG Status Report
(19)   LLC letters
(20)   North American Portability Management LLC memorandum, dated November 11, 1999
(21)   NANPA Fund Performance Status Report & Funds Projection and NBANC Update
(22)   Table of NANC Projects/Activities
(23)   Philip McClelland contribution re: Telephone Number Demand by Unified Messaging Services

V. Summary of the Meeting:

A. Opening Remarks. Chairman John Hoffman provided the opening remarks and introduced Charles Keller, the new Chief, Network Services Division, Common Carrier Bureau to the Council.

B. *Approval of Meeting Minutes*. The October 19-20, 1999 meeting minutes were approved after adopting suggested changes to page 4, paragraph 5, and to the attendance list to change the USTA representative to Tony Pupek. Peter Guggina, MCIWorldCom, suggested that the Steering Group report summaries going forward should reflect "recommendations" to the full NANC and not Steering Group "decisions."

C. *Lockheed Martin NANP Administration 1999 CO Code Assignment Activity Report*. John Manning presented the NANPA report to the Council. Third quarter results are as follows: the cumulative net CO code assignments (for three quarters) is 11,936 (net assignments includes an adjustment for recovered codes). During the third quarter, 4,034 new codes assigned and 164 codes were reclaimed. There are now 73 NPA codes in rationing. This figure represents approximately 30% of the area codes in the United States.

The NANP Exhaust Study projected that 14,889 CO codes would be assigned in 1999. This projection aligns with the year to date actual assignments totaling 11,936 with one quarter remaining in 1999.

New York Department of Public Service (NYDPS) 914 NPA Split: On November 4, 1999, NYDPS ordered the 914 NPA split. As a result, a boundary realignment of the new NPA to follow the Westchester County line will require splitting 5 rate centers. It was noted that the NYDPS decision is inconsistent with the current INC guidelines, which state that NPA boundaries should not split rate center boundaries. Mr. Manning also referred to the August 26, 1999 NANC letter to the Chief, Common Carrier Bureau regarding NANC's recommendation that, in the future, the NANPA should withhold codes where the state splits rate centers. Although the NANPA has not decided how to proceed, it would take the INC guidelines and the NANC letter into consideration in its response to the assignment request.

Chairman Hoffman asked the NARUC members about their opinion in this matter. Vince Majkowski, NARUC, responded that NARUC did not support the August 26th NANC recommendation and its minority position was duly noted in the letter, and added that the FCC needs to make a decision on this issue, even if it means ruling against the minority position. Chairman Hoffman concurred.

Bill Adair, SBC, stated that the NANC letter was very clear as to how the NANPA should handle this situation. Chairman Hoffman asked whether the NANC could reconcile withholding the code from New York in light of the NANC decision to permit Minnesota to receive NXX codes in a similar situation this past summer. Norm Epstein, GTE, responded that the NANC letter did not address the instant NYDPS situation, and added that the adopted NANC policy was on a going-forward basis. Paul Hart, USTA, suggested that the NANC confirm that the instant case (914) is an identical situation to the Minnesota situation and therefore the policy should apply. Mr. Manning noted that the 914 split was a new situation and the NANC letter only covered the New York 516 NPA split, an ongoing proceeding at that time the letter was released.

Peter Guggina, MCI WorldCom, suggested that the NANPA should follow industry guidelines and not be given discretion to override the guidelines. Lolita Smith, CTIA, stated that CTIA supported the recommendation in the NANC letter. Chairman Hoffman expressed concern that the New York staff was not present at the meeting to defend its position. It was noted, however, that they were invited to participate by conference call, but later declined.

Paul Hart, USTA, stated that the NANC should take a reasonable position in preventing such situations from re-occurring, and to allow the NANPA to exercise discretion in this matter by permitting New York to split the rate centers would negate the NANC policy. Bill Adair noted that a similar issue involving the Missouri PSC dragged on for 6 months, which resulted in a lot of uncertainty. He opined that the NANPA should follow the guidelines and deny the codes to New York. Chairman Hoffman agreed that Mr. Adair was articulating the NANC consensus on this issue.

Beth O'Donnell noted support for the NANC policy, adding that it was not clear if the NANC letter was disseminated to the states, including the NYDPS. Chairman Hoffman confirmed that NANC had received a response from the NYDPS dated September 15, 1999, saying, in effect, "mind your own business." Jo Gallagher, Bell Atlantic (BA), added that the NYDPS was very aware of the NANC position on this issue, and supported requiring the NYDPS to follow the revised INC guidelines. Peter Guggina stated that it would be farfetched to interpret the August 26th NANC letter as granting the NYDPS a blanket exemption, and to do so would be discriminatory to other states.

Philip McClelland, NASUCA, stated that the NANC should consistently support regulatory conservation. It was noted that the new INC guideline was issued on August 30, 1999. Hoke Knox, Sprint, added that the splitting of rate centers also raises technical issues regarding local number portability (LNP) capability.

Finding a clear consensus on the issue, Chairman Hoffman suggested that NANC should send a letter to the Chief, Common Carrier Bureau noting the NARUC position and the LNP technical feasibility issue.

Several members expressed concern that, if this situation arises in the future, the NANPA should be able to follow the guidelines and just say no, especially if the NANC is not in session to be able to make a consensus recommendation. Carl Hansen, Omnipoint, stated that the NYDPS should be informed that, in order to avoid a delay in the resolution of this matter, it should respond promptly to the FCC regarding the NANPA action taken in response to the NANC recommendation. Chairman Hoffman added that as a general matter, the NANPA should not be making policy calls.

Chairman Hoffman interjected that FCC Chairman William Kennard's letter to MCI WorldCom acknowledging the return of 77 NXX codes should be noted in the NANC public record.

NANPA staff meeting with FCC. On November 10, 1999, NANPA staff briefed Chairman Hoffman and Commission staff: Deputy Bureau Chief, Yog Varma; NSD Chief, Charles Keller; DFO, Diane Harmon; and Special Assistant, Jeannie Grimes. Topics discussed included the timing of NPAC release 3.0, the NANP Exhaust Model, and the NANP Pooling Model. Mr. Manning noted that the Pooling Model will be modified to get information on each individual NPA. Such design changes and modifications will provide the industry and NANPA a better idea as to what is going on with NPA exhaust.

Chairman Hoffman stated that the briefing was beneficial and provided a better understanding of the NANP pooling model and the changes that would be necessary to get the information he would like to see; however, the cost of making some of those changes may not be worth the benefits. In response to a remark by Paul Hart, USTA, that it was important to get a valid tool as soon as possible, Mr. Manning stated that it would never be possible to get a 100% accurate tool. This is an ongoing process to get closer to more accurate answers.

Mr. Manning stated that there is a separate model for each geographic NPA. Norm Epstein stated that it was important for the industry to get a better understanding as to what model is being developed and to receive an opportunity to give input.

Mr. Manning noted that a thorough explanation of the NPA exhaust model and associated methodology used in the April 1999 COCUS and NPA Exhaust Analysis was recently presented in Denver, but NANPA would be happy to do it again. The NANPA believes that instead of modifying the models used in the NANP Exhaust Study, it can apply "what if" scenarios to a model or set of models developed from the tools used in the April 1999 COCUS.

Chairman Hoffman added that he is now convinced that there is no silver bullet with respect to a tool; however, it is a reasonable to assume that the answers needed can be obtained using the existing models. The model should be part of the NANPA requirements and should not be considered an enterprise service.

Mr. Manning reported that the NANC Chair web page (http://www.nanc-chair.org) has been setup for the purpose of posting working group information and documents for ease of access and review prior to NANC meetings.

St. Louis Dispatch News Article Regarding Overlay in Philadelphia. (Handout #4). Chairman Hoffman provided a copy of the article for the Council's information. The article discusses call-processing failures due to the non-programming of PBX systems. The ILEC, NANPA and state commissions disagree on who is responsible for educating the public. Paul Hart stated that this is a recurring issue within the industry -- it is the responsibility of each entity, having ownership of the terminal equipment, to ensure that such devices are compatible with upgrades to the network and area code changes. There have been public notices and information from the FCC to remind the public to keep these devices up to date. Terminal equipment is a private responsibility.

D.   *NANPA Oversight Working Group.* Pat Caldwell, Co-Chair, presented the report to the Council. The WG received input from NANC members on the audit framework document and there is now an "almost final" document presented for NANC approval. The WG decided that "for cause" audits would be addressed as part of the bid process. Furthermore, the WG decided to leave the wording in place that would allow the NANPA to "reach through" to the customer. In terms of paying for the audits, a budget was created whereby everybody would contribute in the first term. The WG requested NANC resolution regarding whether the NANPA should be allowed to audit service providers in "unforeseen circumstances" and prior to industry guideline development.

Mr. Caldwell stated that the WG now seeks NANC guidance on whether to allow auditors, on their own motion, to conduct "for cause" audits for "unforeseen circumstances." Chairman Hoffman stated that the NANC had debated this on previous occasions, and had sent it back to the WG to decide the issue.

Peter Guggina questioned whether the NANPA would be verifying and assessing the reasonableness of a request for resources. Mr. Caldwell responded that the NANPA would perform CO Code application related audits. Peter Guggina clarified that there are different degrees of auditing, *i.e.*, if you make an application for a CO Code, it would be reasonable and prudent for NANPA to look at the request and do an assessment. The process begins with verification; if a code request is not reasonable, then the NANPA may look at carriers' records. Pat Caldwell concurred and stated that NANPA was looking for the authority to conduct audits, not just verification.

Karen Mulberry, MCI WorldCom, Co-Chair, stated that section 6.1 describes NANPA's role in the "for cause" auditing process. The NANPA is asking for some latitude to ask questions for clarity that may or may not be specifically related to an issue in the application. Jo Gallagher, Bell Atlantic, added that this section also states: "Other 'for cause' audits may be conducted by an auditor which may include NANPA." Ms. Gallagher questioned whether this would be relevant to "for cause" audits conducted by NANPA during the application process, and whether a third party auditor could potentially, at the request of NANPA, initiate a "for cause" audit based on some unforeseen circumstance. Ms. Mulberry responded that this issue must be resolved.

Norm Epstein stated that when it comes to auditing, a clear bright line test should be applied. Chairman Hoffman stated the decision was made to have two types of audits: random audits and "for cause" audits. The only issue remaining is whether there should be an "unforeseen circumstances" "for cause" audit.

Ed Gould, AT&T, commented that it would be difficult for NANPA to make this decision, and that the NANC should weigh in. Trent Boaldin, OPASTCO, suggested that allowing NANPA to do this could raise some neutrality concerns. Chairman Hoffman responded that this is not an issue of whether the NANC trusts NANPA to instigate audits, but rather, it is an issue of whether there exists a comprehensive list of what should trigger audits. Carl Hansen suggested that if an event triggers the NANPA to

conduct an audit, the NANPA should report to the NANC, and the NANC should instruct a work group to do the work.

Chairman Hoffman, hearing no opposition, stated that the "unforeseen circumstances" language should be deleted, and that "for cause" audits will occur only based on the language contained in section 6.1 of the audit framework document. At this time, there is no specific timeline for the INC to complete its work, but the INC could be doing guideline modifications at the same time the WG is working on the bids. Chairman Hoffman suggested that the INC complete the work by the end of the first half of 2000. Specifically, the INC will write the guidelines for the auditors to follow.

According to Ms. O'Donnell, the NANPA should only be doing "for cause" audits, with explicit direction, but should not initiate the audits. She reiterated that the NANC must address whether it wants to give direction to the NANPA OWG to include in the requirements document that "for cause" audits cannot be done by the NANPA. Chairman Hoffman suggested that it should not matter who performs the audit.

Carl Hansen commented that sections 6.0 and 6.1 are straightforward in stating that "for cause" audits are conducted to verify compliance with established guidelines and may be initiated by NANPA or by an appropriate regulatory authority. Section 6.1 further states that for cause audits may be conducted by an auditor which may include NANPA. Mr. Hansen suggested the best place to discuss an outside auditor is at the INC.

Beth O'Donnell proposed that the NANC's recommendation should be that a regulatory body conduct "for cause" audits to assure neutrality. Norman Epstein stated his belief that NANPA is already required to do the verification portion of "for cause" audits, and that the cost of an audit is another reason to look to a third party to conduct audits.

There was some discussion about section 10, which addresses disputes and sanctions. Ed Gould opined that when the FCC or a designated authority believes that the person being audited is in the wrong, the audit should be resumed and proper sanctions should be enforced.

There was further discussion on what parties could conduct "for cause" audits. Chairman Hoffman suggested that the current language provides that NANPA, a regulatory body, or an another entity can perform "for cause" audits. He further stated that the states have been delegated authority to audit, and, if an unforeseen circumstance arises, the states will likely audit; moreover, the NANC can not restrict the authority of the states to audit. Carl Hansen added that while most of NANPA's "for cause" audits would be triggered with a request for a code, state audits could be triggered for something other than a request for a code.

Year 2000 Work Plan. The WG has an ongoing task of monitoring concerns with number assignment and has been tasked with developing the auditor requirements document and selection process. The WG will update the NANPA Requirements document before expiration of the current contract. The WG believes that there may be some efficiencies

gained if it is allowed to concentrate on the new COCUS as well. The WG requested NANC approval for three items related to the 1999 NANPA Performance Review.

There was discussion of whether there should be fewer NANC working groups. Also, there was discussion of which working group (NANP Oversight or NRO) should work on the new COCUS. Chairman Hoffman suggested giving the NRO WG authority over COCUS simply to balance the workload between the two working groups. Norman Epstein stated that by combining efforts, efficiencies will gained. Trent Boaldin suggested that the NANPA OWG should do the COCUS work because it has the experience needed to develop a requirements document.

Continuing with the report, Mr. Caldwell stated that the WG is proposing to send the 1999 NANPA performance survey out during the first week of January. The NeuStar NANPA annual report is expected by mid-January. February 10, 2000 is the cut-off for survey responses. During the first week of April, the NANPA OWG team will go through surveys and evaluate the NANPA annual report to prepare its report to be presented to the NANC at the May 23-23, 2000 meeting. Industry associations represented on the NANC were encouraged to assist in this effort by notifying their respective memberships of the existence of the performance survey. Notification will be facilitated by the use of three distribution lists created by the NANPA OWG: (1) the CO Code Application Part 1 Contact Names; (2) NPA Relief Planning Contact List, and (3) the Regulatory Contact List.

Several members suggested that industry associations, the FCC, NARUC, and any of the state commissions provide access to the questionnaire and suggested that organizations should be requested to place a link to the questionnaire on their web sites.

Mr. Caldwell then discussed the Auditor Requirements and Selection Tentative Work Plan. The main issues are implementing audit timeframes, and that there will be an overlap with the NANPA OWG and the INC work efforts. INC could be finalizing the guidelines while the NANPA OWG is finishing the requirements document. It will take a subgroup 30 days for the first draft of the requirements document, and approximately ninety days is needed to edit the requirements document and undertake legal review through the legal working group of the NANC. Chairman Hoffman stated that the NANC will have to reinvigorate the former Legal Expertise Working Group and offered to take it as an action item for the NANC.

The process will cover a thirteen-week period, including two weeks for questions and answers from vendors for clarification and three weeks for the vendors to go back and study the proposal and submit their response to the requirements document. The WG will provide the NANC with thirty days to review and confirm selection.

With respect to other work assignment issues, the volume of code applications generated as a result of the California jeopardy situation and the possible impact on the NANPA contract is currently under review by the WG. An update will be provided at the next NANC meeting.

The WG is working on the NANPA transferable intellectual property issue. The broad view is that essentially anything bought with industry money is transferable. There is a more narrow view that only software created by the NANPA is transferrable (but not "off the shelf" software). Chairman Hoffman asked Mr. Caldwell if the NANPA OWG would report further on Intellectual Property at the January NANC meeting.

E.   Number Resource Optimization (NRO) Working Group Report. Beth O'Donnell, Co-Chair provided the report to the Council. At the October NANC meeting, the NRO was directed to contact the appropriate work groups to ensure that there was no duplication of effort with the NRO's monitoring of pooling. The NRO was asked to revise and review the draft plan for the completion of unassigned number porting (UNP) and to contact INC to determine the status of its review on Issue #177 – UNP. The LNPA WG and the state coordinating group (Elsa Morris, Ohio Public Utilities Commission) were contacted. The LNPA WG found no overlap, and the state group forwarded an executive summary containing a list of topics covered at its last conference call.

The NRO has committed to keeping the state coordinating group updated on further developments, and has contacted the pooling administrator to determine what kind of information has already been collected. Ms. O'Donnell stated that the NRO needs to reach consensus on what kind of information or reporting is needed in order to approve their own work plan. It is expected that information would be gathered at the beginning of a pooling trial, and more would be gathered on a monthly basis.

The NRO discussed how long it would be collecting this data, stating that even after national pooling has commenced there maybe a desire to continue to collect information. The NRO is using January 1, 2001 as its assumption for the commencement of national pooling. It was determined that INC should be part of the process but that the NRO would be looking at the results of the trials for information on priorities and criteria that might differ from the guidelines. It was also agreed that states could have criteria which is different from the INC guidelines which should be monitored by the NRO and would be highlighted in the quarterly reports.

The NRO WG stated that the INC was going to report to the NANC directly on INC UNP activities. As such, the NRO WG decided that no further action is presently necessary or possible. A conference call scheduled for Friday, November 19, 1999 will focus on completing the NRO number pooling work plan.

Gilbert Orozco, SBC Communications, sought clarification on what the purpose of the reporting or tracking tool would be. In particular, how will the tracking tool be used? Chairman Hoffman inquired whether the NRO was planning to provide a matrix for each NPA involved in pooling. Ms. O'Donnell responded in the affirmative. Chairman Hoffman requested that the NRO WG forward this information for posting on the NANC Chair web-site and added that the NRO WG should be interacting with all the various

groups involved in number pooling so that the NRO WG can make meaningful reports to the NANC.

Mr. Orozco commented that the information on pooling would come too late to help the FCC with the NRO proceeding. Chairman Hoffman responded that the reason that some states are starting pooling, and others are not, is important information for the FCC to have. The purpose is not just to get data after the trials have started. Some states, for example, are starting with Release 1.4, others are waiting for Release 3.0. The FCC is trying to get out an order that is forward-looking by the spring of 2000

Beth O'Donnell stated that the WG is asking for a lot of information at the start, but the continual reporting information will be available on www.numberpool.com. Bill Adair stated that a number of the items on the matrix look subjective and recommended focusing on the fact-based information to the largest extent possible, then allow the reader (*e.g*., the FCC, state commissions, or industry providers) to evaluate. Trent Boaldin asked whether the work plan was finished. Ms. O'Donnell stated that the three-page document was finalized, but the work plan had not been reviewed by the NRO WG.

In response to a question from Ed Gould regarding the Illinois pooling trial, Brian Baldwin stated that Illinois did not request this type of information before ordering pooling, and opined that an analysis of each NPA should be completed first to determine whether pooling makes any sense.

Gilbert Orozco added that hard facts are needed to determine whether pooling is working. For example, when does the current NPA exhaust? How many LNP providers are participating? How many blocks are being donated both contaminated and pristine? That information can then be run through the NANPA pooling model to arrive at a projection on how long the NPA will last. Beth O'Donnell stated that a lot of the information is targeted at finding an optimal way of approaching pooling; a reality test of how pooling is going.

It was noted that in number 11, "trial specifics," it should read "Block donation mandatory" because at least in one place block donation is not mandatory. Mike Whaley, NRO Co-Chair, noted that the purpose of this exercise is to have a starting point for putting this information together into a package where we can begin to look at pooling.

Jo Gallagher was not opposed to collecting factual information on the state trials, but believes it is inappropriate for the NRO WG to reach subjective conclusions on the merits of the state trials. Chairman Hoffman stated his belief that the FCC will turn to the NANC for these subjective conclusions, adding that the goal is to find out not only what happens during the trial, but also before the trial. Norman Epstein stated that you need to have pooling in place to determine if it is working.

Jo Ann Sanford, NARUC, stated that this would be useful to the states, and the NANC is the best group to make these kinds of decisions and make sure that all points of view are presented. Natalie Billingsley, NASCUA, reminded the Council that California is going

to commence pooling in at least two NPA's (310 and 818) on March 18, 2000 using Release 1.4, so information on pooling will soon be available.

Lolita Smith, CTIA, stated that the method should be fact based and objective. The Chairman agreed that the subjective question of whether pooling works must be answered.

F.   NANC Memorandum Re: New York Public Service Commission – 914 Split. Chairman Hoffman drafted a memorandum to Lawrence E. Strickling, Chief, Common Carrier Bureau, concerning the New York 914 NPA. Carl Hansen clarified that the issue is not technically that the rate center is split, but that people in the same NXX are on both sides of the split rate center.

Dan Gonos, Winstar (representing ALTS), stated that it would be beneficial to focus on the number of NXX codes potentially affected, rather than the number of rate centers. John Manning, NANPA, cautioned that the initial assessment was 15-20, but that more exact numbers will be available after service providers do their own assessment. Peter Guggina cautioned against trying to define the exact effect, stating that the letter should be general. Paul Hart, USTA, opined that the letter should clearly state what the NANC is advising NANPA to do.

Chairman Hoffman asked for clarification on the difference between "not issuing a new NPA" and "denying the request for a new NPA." Paul Hart responded that "not issuing" is equivalent to doing nothing, in effect leaving the issue in limbo.

Carl Hansen suggested that the New York Commission be copied on the response to the letter.   There was more discussion on specific wording, and on whether the FCC would need to respond or whether the purpose of the letter is simply to put the FCC on notice of the NANC's action.

Diane Harmon, DFO, stated that this issue is being addressed in the context of the NRO proceeding and that, in the absence of specific FCC mandate, the industry guidelines should be followed in the normal course of business.

G.   NRO WG Report (continued).   Regarding the monitoring of pooling activities, Paul Hart, USTA, commented that the variations in the way that pooling is implemented could cause different outcomes. The NANC has to decide what is good data -- factual data is the key, so that the NANC can draw clear conclusions.

Bill Adair, SBC, suggested discussing the information presented at the conference call on Friday and coming to a resolution on the issues. Chairman Hoffman responded that the NRO WG is going to look at this from the perspective of what they can receive from the states. It was suggested that the NANPA do this work because it already has a lot of the data.

Chairman Hoffman reiterated that the NANC has ultimate responsibility to advise the FCC on pooling and to do so based on objective facts. The whole process is, however, to reach a subjective conclusion to be presented to the NANC. The NANC in turn will provide an evaluation for the FCC and emphasized that NANPA should not be making the ultimate decision on this matter.

Gilbert Orozco suggested that if all the data is available at NANPA, it should be obtained from NANPA. Beth O'Donnell pointed out that not all of the information may come from NANPA because NANPA may not be the pooling administrator in all instances -- some information must come directly the states. Chairman Hoffman stated that the NRO WG and the NANC will learn through this process.

There was further discussion on the scope of what the NRO WG should do; that is, whether it should make subjective conclusions as to whether pooling works. Trent Boaldin asked the Council if it was opposed to the NRO monitoring pooling and having the NRO make subjective conclusions. Jo Gallagher commented that there should be a vote as to whether the work should be done and a clear description of the expectations of the work to be done. Chairman Hoffman stated that the NRO WG would only make a recommendation to the NANC. Lolita Smith responded that it is not appropriate for the NRO WG to make a recommendation regarding whether pooling works. It would be sufficient for the NRO to present a fact analysis. The Chairman reiterated that the NANC would make the final judgment.

Dan Gonos stated that everything that the NRO provides to the NANC has subjective conclusions, but that the NANC is free to accept or reject these conclusions. He emphasized that much of the data would be objective, but some would be subjective. Carl Hansen commented that the NANC could distinguish between subjective and objective facts, and is free to accept or reject both. Chairman Hoffman called a vote on whether the NANC wants the NRO WG to monitor pooling, and whether the NANC wants the NRO WG to go ahead with the business plan presented at the NANC meeting. The Council concluded:

> "The NRO is to proceed with monitoring of pooling by gathering information as specified on the matrix. They have the option to revise the matrix as necessary in accordance with the comments discussed. The NRO WG is to report progress at each NANC meeting and post the results on the NANC Chair web-site."

H.   *Local Number Portability Administration (LNPA) Working Group Report.*
Charles Ryburn, SBC Ameritech, Co-Chair, presented the report to the Council. Anna Miller, Bell South Cellular, presented the Wireless Number Portability Subcommittee (WNP SC) report. Ms. Miller reviewed the WNP SC key issues and action items addressed in the November 1999 WNP SC meeting. The WNP SC updated the Wireless Number Portability Timeline NANC action item to reflect industry and service provider activities and milestones for LNP implementation. In addition, the WNP SC continued to discuss its Gap Analysis and the required standards, and network/back office hardware and software requirements to support timely completion of functional specifications,

system development, and testing. The WNP SC identified scenarios under which service providers should analyze their individual network and billing systems. The WNP SC also drafted a table of contents for its Wireless Number Portability Report to the NANC, which is needed as a reference for all agreements and guidelines for implementing wireless local number portability.

Based on individual network architecture, signaling, and billing configurations, each wireless service provider should identify the hardware and software upgrades required to support wireless LNP, especially where the mobile directory number (MDN) and the mobile identification number (MIN) are not the same. The WNP SC will assign sections of the Wireless Number Portability Report at its December 1999 meeting – the report will be completed by June 2000.

The Test Plan SWG will meet on December 13-14, in Albuquerque, New Mexico, which is coincident with the West Coast LNP Operations Team meeting. The CTIA Inter-carrier Communication Process task force will complete their recommendation on the wireless to wireless intercommunication process in December 1999.

WNP SC Status Report updates are shown in italics in the handout. These updates include item (1H) - the next Test Plan SWG; item (3H) - service providers will continue their gap analysis to identify network, billing and back office requirements.

According to the wireless number portability timeline, service providers should complete their analysis by April 2000 so the Functional Specifications can be completed. Item (4H) - all service providers should analyze their network, signaling, billing, and operations support systems (OSS) configurations to identify all hardware and software upgrades required to support LNP. Item 5(H) - service providers must determine their functional specifications in all network and OSS necessary for MIN/MDN separation; item 10(H) - the WNP SC will review and the draft Wireless Number Portability Report table of contents and assign sections at its December 1999 meeting.

In response to the NANC Action Item, the WNP SC updated the Wireless Number Portability Timeline. In the updated timeline, industry milestones (shown in green blocks in the timeline) have been separated from service provider milestones (shown along the thin pink lines in the timeline) to differentiate the responsibilities for implementing wireless LNP. Defining the inter-carrier communication process, perhaps the most critical industry activity and which the CTIA task force is handling, is scheduled for completion in March 2000. The task force is specifying the information that service providers will exchange to port a customer, and what systems and processes are needed to accomplish this. Other industry activity reflected in the timeline is the drafting of the baseline definition of the inter-carrier test plan, which the LNP Subcommittee SWG is handling and which is scheduled for completion by June 2000. The inter-carrier test plan is dependent on the inter-carrier communication process, especially to ensure that pre-order and pre-port activities function properly. The inter-carrier test coordination, also scheduled for completion in 2000, involves coordination with each regional LNP operations team. Meetings with each operations team have been deemed necessary to

determine what organizational structure and testing are needed to support inter-carrier testing.

Service providers are responsible for completing the functional specifications needed to support wireless LNP by April 2000. This requires identification of all necessary modifications to OSS to ensure that wireless LNP will function. Pre-port involves inter-carrier communication and the OSS changes needed to transmit information for ported subscribers. The port process involves the information that service providers send to and receive from the NPAC. There are a number of interdependencies, such as the OSS information needed (*e.g.,* call detail records) from switches and tandems for billing. Other billing considerations in an LNP environment include roaming, resale, fraud protection, number administration, standards and network elements. After service providers determine their functional specifications, they must complete systems development, *i.e.,* MIN/MDN separation, to support LNP.

Industry milestones in 2001 include coordination of NPAC turn-up testing, tentatively scheduled from May through September 2001; inter-carrier testing logistics coordination with the regional LNP operations teams during the first nine months of 2001; inter-carrier testing will begin in October 2001. Service providers, in 2001, will complete systems development to support functional specifications, and will complete internal testing to ensure modifications and OSS function, followed by NPAC turn-up testing. During the eight months following NPAC turn-up testing, service providers are scheduled to complete inter-carrier testing. Service providers will then deploy LNP in their networks, tentatively by September 2002, with final adjustments to be completed before November 24, 2002.

Vince Majkowski asked whether items identified in the Wireless Wireline Integration Report (*i.e.,* LSRs, FOCs, etc.) were included under the Port heading in the timeline. Ms. Miller answered in the affirmative and added that Pre-port (pre-order in the report) is the information exchanged between two service providers to port a customer. After confirmation, the port process involves information exchanged between the service provider and the NPAC.

Mr. Majkowski also asked whether E-911, which has been identified as a major concern, should be considered with the Functional Specifications. Ms. Miller stated that E911 issues are included with the networks in the timeline, and will be addressed by the LNPA WG. Lolita Smith commented that there is also a separate proceeding in place for wireless E-911 issues, which carriers are addressing. Peter Guggina asked whether pooling was included with wireless number portability implementation. Ms. Miller stated that the subcommittee's focus was only portability.

In response to a question as to why three years are necessary for wireless LNP testing, Ms. Miller replied that nothing precludes the possibility of simultaneous, or parallel, testing. The WNP SC, however, determined that the timeframe was reasonable, especially given the resources available. For the inter-carrier test plan, determination of the test requirements is necessary before testing can actually begin, which is how it was

done by the wireline industry in Illinois. After requirements are identified, then test coordination planning can begin, while systems development is progressing. The periods specified in the timeline are necessary given all that is occurring. Apparent gaps in the timeline are the result of the timeline format. Tasks are actually performed sequentially, without any delay.

Ms. Miller stated that the Southeast region determined that 15 months was needed for wireline inter-carrier testing, as opposed to the eight months currently scheduled in the wireless LNP timeline. This is why coordination begins in 2000, and logistics determination in 2001 -- to better determine what is necessary. It took nearly a year to define the functional requirements for pooling, whereas six months has been scheduled for this in the wireless LNP timeline. The timeline presented is the best estimate of the time required for each activity in the workplan.

Charles Ryburn commented that the timeline is well thought-out and aggressive, and involves a number of different systems that have to be synchronized. Number portability, however, should not affect roaming services. Rick Kemper, CTIA, commented that an authentication test plan of 500 pages took approximately five years to develop and implement; wireless LNP implementation is a similarly daunting process. Seth Jones, Nextel, commented that the wireless industry has a number of concurrent projects, including E-911 and CALEA, which are impacting wireless LNP implementation.

Mr. Ryburn continued with the LNPA WG report presentation with a review of (1) LNP Problem Identification and Management (PIM); (2) NPAC/SMS Release Status, and (3) Slow Horse Update. The PIM WG is currently handling two issues. A third PIM issue was submitted the week before their last meeting and will be placed on the agenda for the December meeting. All of these issues are being tracked on the PIM web site.

Regarding NPAC/SMS Release 4.0, the WG discussed the business needs and prioritized change orders with the LLCs at its November meeting, but final selection of release change orders has not been completed. The requirements development, however, has begun and the WG has scheduled another meeting on November 17-18 for development in addition to the December meeting. Requirements are to be delivered to the vendor by January 21, 2000.

Slow Horse Update. The Slow Horse SC had a good discussion at its November meeting, but made no tangible progress. Several different situations can affect LSMS availability: (1) LSMS cannot keep up with NPAC broadcasts, so acknowledgements are delayed and the NPAC drops LSMS association; this could be improved, near-term, by allowing the NPAC to tolerate longer delays for LSMS responses; (2) Unsynchronized LSMS maintenance activity occurs, which could be resolved by increased emphasis on the need for industry to synchronize its scheduled LSMS maintenance activities; and (3) an LSMS outage occurs outside of normal business hours, but the service provider cannot be reached to restore service. This could be remedied by providing 7x24 coverage so prompt LSMS restoration is achieved even outside of normal business hours.

Ed Gould, AT&T, asked what is necessary to obtain some tangible progress. Mr. Ryburn replied that the Slow Horse SC, in its October meeting, decided how system availability and unavailability are defined and these items will be used with the near term solutions to develop permanent solutions to the LNP problems. Chairman Hoffman asked whether failure rate was determined by measuring the unavailability of the system, and if so, what is the failure rate percentage. Mr. Ryburn replied that failure rates were not measured by system unavailability. In response to Chairman Hoffman's question of how "slow horse" is measured, Mr. Ryburn replied that vendors provide data on system down time.

Shelly Shaw, Nextlink, added that in evaluating availability, the rate of partial failures is measured. A partial failure occurs when a number is activated in the NPAC and does not successfully download to one or more LSMSs. Current failure rates are running from 2-4%, which appears to be increasing as the number of ported numbers grows. Failures typically mean LSMSs are not available and they cannot receive portability data, which could result in calls not being properly routed to ported numbers. There are several possibilities for system unavailability, such as the inability of an LSMS to keep up with the data flow. Or, the LSMS could have been taken off-line. Chairman Hoffman asked if problems were occurring with certain LSMSs more than others. Ms. Shaw replied such data is not available. A consistent pattern of partial failures across the board, however, was observed. Chairman Hoffman suggested that rather than only observing from the NPAC down, that LSMS performance could be observed. Ms. Shaw replied that it was possible that every LSMS has had some instance of partial failure.

Brad Baxter, Nextlink, asked whether any study of data transfer from the LSMSs to the routing databases as a slow-horse cause was occurring. Mr. Ryburn answered no. Ed Gould expressed concern about slow-horse problems and about the further impacts that pooling could have on networks, and suggested that it may be necessary to specify an availability measure for carriers. Mr. Ryburn agreed and added that the ultimate goal of the Slow Horse committee is to provide LSMS performance requirements.

Number Pooling Report and Release 3.0. Donna Navickas provided the update. All seven (now three) of the U.S. LLCs have approved SOW 15, which is the number pooling SOW. With this approval, the first region will begin turn-up testing on June 1, 2000. Currently, there is a Project Engineer/LLC Release 3.0 Project Plan under development. Testing-cycle times, however, are causing delays. The LNPA Number Pooling SC will meet in December to evaluate the test cases and test plans, to determine when a test Release 3.0 can be implemented. A Project Plan that provides general information, but does not identify specific areas for pooling turn-up, is available on the NPAC.com web site. The Number Pooling SC has identified options for migrating 1.4 pooling data to 3.0 pooling data.

The test cases and test plans will be distributed on November 24, 1999, and the Pooling SC will review them from December 14-16, 1999. An integrated functional requirements specification (FRS) document that integrates Release 3.0 pooling requirements with NPAC Release 2.0 will be distributed January 6, 2000. An integrated interoperable interface specification (IIS) document that integrates Release 3.0 pooling requirements

with NPAC Release 2.0 will be distributed February 2, 2000. The Pooling SC will review both of these documents on February 14, 2000. An integrated interoperability test plan will be distributed February 9, 2000, which all vendors must complete prior to turn-up testing in order to accept and recognize all new objects in Release 3.0. The vendors will be able to test in April. The Pooling SC will examine the integrated methods and procedures on January 24, 2000, and will review them in March 2000. There are still seven NPAC regions, although there are now only three LLCs.

Release 1.4 was implemented in Illinois on February 1, 1998 and a Gap Analysis was performed for all carriers in the Chicago, Illinois MSA. All these carriers are receiving downloads with the pooling 1.4 Release. As of November 1, 1999, there are 274 thousands blocks in the database for the 847 NPA. There are 5 thousands blocks in the 630 NPA.

Hoke Knox, Sprint, asked which region will first test Release 3.0. Ms. Navickas replied that the Pooling SC has asked the LLCs to evaluate Release 3.0. The Pooling SC, however, will make its evaluation in the January-February time frame, and the LLCs are awaiting the assessment of the test plan and test cases. Ed Gould commented that carriers may not be using all of the Release 1.4 capabilities.

Beth O'Donnell asked how Release 1.4 differs from Release 3.0. Because carriers have SCP capacity concerns, Release 3.0 contains efficient data representation (EDR) capabilities, which allows an LRN to be associated with a block of numbers, rather than associating an LRN with each individual number. Release 3.0 also allows carriers to perform SOA activation. It was clarified that there are more than 247 thousands blocks in the 847 NPA pool, but that 247 blocks have been assigned as of November 1.

Mr. Knox asked how Releases 1.4 and 3.0 could operate simultaneously in the same region. Ms. Navickas stated that both can not operate in the same NPAC region, but other carriers in other regions may use different release versions, which could very well add to the Slow Horse problem.

Vince Majkowski reminded members that a rather full explanation of the differences between the two software releases exists on page six of the NANPA's frequently asked questions (FAQs). Efficient data representation (EDR), however, is one of the most significant differences, along with what is broadcast across the NPAC interface. Ms. Navickas clarified that all carriers in a region must support Release 3.0 when migration occurs, but can choose whether to implement EDR. Details of options for the migration plan are contained in the Pooling SC meeting minutes.

I.   *Cost Recovery Working Group Report.* Elsa Morris, Co-Chair presented the report to the Council. The WG will not meet during the remainder of November or through December, unless an interim issue requiring immediate CRWG action arises. At this time there are no immediate deadlines requiring action.

However, the CRWG will meet online December 1, to learn how to hold conference call meetings on the web and to set its schedule for 2000. The CRWG will report at the January NANC meeting.

J.   Industry Numbering Committee (INC) Report. Shawn Murphy, Moderator, provided the report to the Council. At the INC46 meeting, Issue-149, creation of guidelines for the aging and administration of disconnected telephone numbers was placed in final closure. The Audit Workshop is focusing on the CO Code assignment guidelines based on the Audits IMG report. The INC NANP Expansion workshop is finalizing its interim report, which is expected to be completed after the conference call scheduled for December 10th. It is anticipated the Interim Report will be issued before December 31st and furnished to NANP regulatory authorities and NANC at that time.

With regard to the status of 1k pooling administration guidelines, version 2 will be issued in January. It was noted that electronic thousands block assignment requests to the PA are acceptable and that no request for resources via fax, paper or other means except in extraordinary circumstances would be permitted. Additionally, the NANC directive on Reseller/Type 1 forecasting responsibilities were incorporated into the 1K PA guidelines.

With respect to the status of Unassigned Number Pooling (UNP), Issue 177, a contribution from Bell South Cellular was submitted in September which proposed the withdrawal of the UNP issue or deferral of work until direction from the FCC is received. The contribution stated that the FCC has not granted authority for UNP trials to any state in response to petitions seeking interim authority. It is believed that this issue will be addressed in CC Docket 99-200 report and order.

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K. Unassigned Number Pooling (UNP). There was general discussion of what UNP entails. UNP is a marketing technique, and is sometime referred to as the porting of vanity numbers, or "mining numbers." UNP would allow access to stranded numbers.

Harold Salters, PCIA, opined that INC should handle UNP. Tony Pupek stated that INC has not put the UNP issue on hold, but it is not being worked at this time because INC is working on the 1K pooling guidelines for completion in January 2000.

Dan Gonos added that the technology for UNP exists today, but there needs to be safeguards in place to eliminate warehousing of TNs. UNP is a good concept that needs to be worked thoroughly to avoid abuses. Peter Guggina noted a need for a completion date for the project. Vince Majkowski opined that UNP is not as important as individual number porting (ITN). Carl Hansen suggested that NANC should wait for guidance from the FCC on pooling and other conservation methods to avoid conflict.

Hoke Knox stated that UNP is a manual process of porting numbers between carriers. This is number administration by the carrier, which could become costly.

Dan Hochvert stated that everyone is urging progress on the UNP issue, but that part of the confusion is the differing definitions. He suggested that the concerns about what UNP is and what the rules should be should be put in writing.

Chairman Hoffman suggested putting a hold on the NRO work plan until the end of the first quarter 2000. NANC should monitor the progress on this issue at the INC and check for satisfactory progress by the end of the first quarter, then evaluate. Tony Pupek stated that INC could report on it at the March NANC meeting and reminded the Council that INC is a contribution driven forum. The Council agreed that the NRO is on hold for any further work on UNP.

The Council discussed the assignment of the COCUS requirements – the hybrid model for year 2000. It was determined that the NRO will develop the requirements by the 1st half of 2000. A timeline for completion will be reported at the January meeting.

L.   *Number Pooling Issue Management Group (IMG) Report.* Peter Guggina, MCI WorldCom, presented the report to the Council. The IMG will release a Pooling Administrator (PA) Requirements document and redacted NeuStar bid response for NANC review by December 10, 1999. The complete NeuStar bid response will be available December 10, 1999, for those that have signed non-disclosure agreements. The IMG is working with NeuStar to resolve proprietary issues associated with these documents.

A conference call is scheduled for November 19, 1999 to review modifications to NeuStar's proposed "terms and conditions (T&C's)." The IMG will forward the revised version to NeuStar for final review. NeuStar is expected to respond to the IMG regarding changes to the T&C's document by November 30, 1999. A joint IMG/ NeuStar conference call is scheduled for December 1, 1999, to review the T&Cs changes and modifications. A face-to-face meeting is scheduled for December 6-8, 1999, to finalize T&Cs, the PA Requirements document and the redacted bid response. The final Requirements document and redacted NeuStar bid response will be delivered to the NANC on December 10, 1999.

Tony Pupek stated that the IMG workshop will meet December 1-2 and hopes, by then, to have a document that contains all issues concerning the guidelines raised by the IMG. Chairman Hoffman expressed concern about the need to complete the requirements document. Peter Guggina stated that Karen Mulberry is working with Barry Bishop, NeuStar, on changes to the T&Cs. Mr. Pupek commented that the IMG and guidelines work would continue at the December 1-2 meeting.

Mr. Guggina stated that an electronic file transfer option has been developed. Also, capabilities have been developed that will allow service providers to send facsimile copies or to mail copies, if they are unable to access the PA web site, with costs for these to be covered by the service provider. Norman Epstein asked whether the finalized agreements with NeuStar will require FCC approval before the PA can be hired, or will

industry have to wait for issuance of an FCC order. Chairman Hoffman replied that an FCC order would be necessary.

Diane Harmon, Designated Federal Official (DFO), commented that a decision on a national pooling scheme is pending. A signed agreement with NeuStar as PA, however, will require an order from the FCC and the timing of this is unclear. The pooling portion of the numbering resource optimization proceeding is targeted to be addressed in the first Report and Order by March 31, 2000.

Carl Hansen commented that the NANC has not yet received a directive from the FCC requiring thousands-block pooling. Chairman Hoffman replied that commitments were made some time ago in anticipation of a FCC order on pooling. If a contract with the PA is signed, but thousands-block pooling is not ordered, certainly, the FCC would not approve the contract. Peter Guggina commented that the idea in beginning pooling work before a FCC order is issued was to have more accomplished when an order is issued.

M.   Oversight of LLCs and NPAC Activities. Pamela Connell, Co-Chair, North American Number Portability Management LLC (NAPM), reported that all seven LLCs are expected to be consolidated by first quarter next year. The NAPM, created from five previously separate LLCs, held its first meeting November 11, 1999. The NAPM centralizes the management of the NPAC-SMS in the Northeast, Mid-Atlantic, Southeast, Southwest and Western regions.

N.   Steering Group (SG) Report. Vince Majkowski, SG Co-Chair, presented the report. First, the SG recommended that there not be a December NANC meeting. The SG then discussed NeuStar's disclosure of the dollar figure for the pooling administrator contract. Peter Guggina asked what the contribution factor for the COCUS will be and whether it is included in the budget. Mr. Majkowski responded that the COCUS figure would be included in the budget after the CRWG provided a recommendation as to what the COCUS should cost. Ann LaLena noted that the CRWG's assignment in developing an audit estimate was an atypical task because this group typically only determines who should pay for a specific activity.

Mr. Majkowski stated that the NANPA's FAQs would be on the NANPA website to clarify the authorship of the document.

Mr. Majkowski then discussed the proposed NANC assignment timeframes. He identified the following items on the list as priorities: (1) finalizing the terms and conditions of pooling; (2) developing the requirements for the COCUS Hybrid Survey; and (3) monitoring the state pooling trials. Mr. Guggina recommended that the UNP definition and guidelines should also be a priority.

Mr. Majkowski then stated that the free numbers issue (unified messaging services) was an ongoing item of discussion and will be discussed at the next meeting. In response, Chairman Hoffman observed that this issue concerns broad, philosophical issues that the

Council needs to consider. Phil McClelland, NASUCA, will send a revised report with some additional information.

Discussion then moved to the Philadelphia Inquirer article on the problems that some PBX customers and others had after the area received a new area code. The article focused on the responsibility of service providers, state commissions and the NANPA to educate the public about such changes, and specifically to notify owners of customer premises equipment (CPE) to facilitate the timely reprogramming of PBXs.

Telcordia was invited to give a presentation on how the LERG works, the traffic routing procedures, and what information it needs to keep the LERG updated. Apparently, there is also an INC subcommittee working on a training document to make the industry more familiar with the LERG. Members offered their suggestions on what information Telcordia should be prepared to discuss during that presentation.

O.   NBANC Report. John Ricker, NECA provided the status report to the Council. The new factor will include funds for the proposed auditing and pooling estimates. The proposed factor will be filed with the FCC for approval after the November 18th NBANC board meeting.

NANPA Fund Performance: The fund status financials were read into the record. The current fund balance is $1.1 million; projected receivables total $873K, with payments to the NANPA to date totaling $2.85 million, with remaining payments totaling $1.43 million. Payments to NECA total $171K to date with remaining payments totaling $86K. 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.

With respect to the funding process, as of October 31, 1999, 3,973 forms were received with gross revenues totaling $232B and net revenue total of $188B.

P.   Other Business. Chairman Hoffman stated that a memorandum regarding contributions for funding the travel expenses of the non-profit NANC members would be distributed by e-mail.

John Manning stated for the record that with regard to NANC Chair administrative support, there is no agreement between NeuStar and Bonnie Baca at this time, and that it is still an open item.

Q. Next Meeting: January 18-19, 2000.

V.   NANC Action Items and Decisions Reached.

1.   NANPA Report. NANC directed NANPA to deny New York PSC a new NPA in accordance with the NYPSC-ordered relief plan for the 914 NPA that split rate centers. The NANC Chairman agreed to prepare a memorandum to Chief, CCB

advising of the NANC decision. The text of the memorandum was proposed, reviewed and accepted at the meeting.

Chairman Hoffman will continue to work with NANPA and will report status (process of forecasting NANP exhaust) at each NANC meeting.

2. <u>NANPA Oversight Working Group Report</u>. Audit Framework document was accepted and will be forwarded to the Industry Numbering Committee (INC).

- For cause audits must be determined only in accordance with bright line conditions.
- No audit activities are supported in "unforeseen circumstances."
- Letter to INC will direct an update of applicable industry guidelines to audit. Conditions will include audits of NANPA as appropriate. Pat Caldwell will develop proposed letter for Chairman Hoffman.

NANC agreed to reinvigorate the Legal Expertise Working Group. NANC Chair will make contacts.

3. <u>Numbering Resource Optimization Working Group</u>. NRO is directed to proceed with the monitoring of pooling trials by gathering information as specified on the draft matrix.

- The matrix will be revised as necessary.
- Report progress at each NANC meeting.
- Post results on NANC Chair's web site at www.nanc-chair.org.
- COCUS Hybrid requirements development is assigned to NRO for completion by the 1st half of Year 2000.
- UNP assignment is suspended at NRO, pending progress report from INC at the March 21-22, 2000 NANC meeting.

4. <u>Number Pooling IMG Report</u>. The IMG should have administrative conditions from INC before the IMG/NeuStar December 6-8 face-to-face meeting.

- Resulting recommendations must go to the FCC for process – conclusion of NeuStar 's contract as pooling administrator requires FCC formal action.

5. <u>Steering Group Report</u>. NANC accepted SG's Table of NANC projects/activities. The table will be posted to FCC NANC web page at www.fcc.gov/ccb/Nanc and the NANC Chair web page at www.nanc-chair.org.

The previously scheduled December 14-15, 1999, NANC meeting has been cancelled. The next meeting will be held on January 18-19, 2000.

6. Telcordia will provide a tutorial on code activation at the January 18-19 NANC meeting.

7. <u>Industry Numbering Committee Report</u>.   INC is to proceed with consideration of UNP in accordance with discussion at the NANC meeting.
   - Report progress on the issue to NANC in the March meeting.
   - Future assignment determination will be made depending on progress reported