

North American Numbering Council
Meeting Minutes
April 25-26, 2000 (draft 5-24-00 4:00 pm)

I. Time 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, S.W., Room TW-C305, Washington, DC.

II. List of Attendees.

Voting Council Members:

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| 1. Beth Kistner | ALTS |
| 2. Ed Gould | AT&T |
| 3. Dan Hochvert | Bell Atlantic |
| 4. Terry Monroe | CompTel |
| 5. Ron Binz | CPI |
| 6. Lori Messing | CTIA |
| 7. Norm Epstein | GTE |
| 8. Karen Mulberry | WorldCom |
| 9. Erin Duffy | NARUC |
| 10. Peter Pescosolido | NARUC |
| 11. Thomas Dunleavy | NARUC |
| 12. Philip McClelland | NASUCA |
| 13. Natalie Billingsley | NASUCA |
| 14. Barbara Meisenheimer | NASUCA |
| 15. Beth O'Donnell | NCTA |
| 16. Lawrence Krevor/James Goldstein | Nextel |
| 17. Shelly Shaw | Nextlink |
| 18. David Bench | Nortel Networks |
| 19. Carl Hansen | VoiceStream |
| 20. Trent Boaldin | OPASTCO |
| 21. Harold Salters | PCIA |
| 22. Bill Adair | SBC |
| 23. Ron Havens | Sprint |
| 24. John Hoffman | Sprint PCS |
| 25. Gerry Rosenblatt/David Thompson | TIA |
| 26. Paul Hart | USTA |

Special Members (non-voting):

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| Maria Estefania | ATIS |
| Brenda Stevens | CRTC |
| John Manning | NANPA |

Commission Employees:

- Cheryl Callahan, Designated Federal Officer (DFO)
Jeannie Grimes, Alternate DFO

Diane Griffin Harmon, Deputy Chief, Network Services Division, CCB
Aaron Goldberger, NSD, CCB
Barry Payne, NSD, CCB
Les Selzer, NSD, CCB

III. *Estimate of Public Attendance.* Approximately 43 members of the public attended the meeting as observers.

IV. *Documents Introduced.*

- (1) Agenda
- (2) Unassigned Number Porting (UNP) Ad Hoc Report
- (3) NANC Discussion Group on Charging for Telephone Numbers, Draft Report
- (4) NANC Assumptions Issue Management Group (IMG) – NANP Expansion Tutorial
- (5) North American Numbering Plan Administrator (NANPA) Report
- (6) Limited Liability Corporations (LLC) Report
- (7) NANC Assumptions IMG, Draft Report
- (8) Numbering Resource Optimization (NRO) Working Group Report
- (9) Local Number Portability Administration (LNPA) Working Group Report
- (10) Wireless Number Portability Subcommittee
- (11) Cost Recovery Working Group Co-Chair Report
- (12) NANPA Fund Performance Status Report and Funds Projection
- (13) March 21-22, 2000 NANC Meeting Minutes
- (14) Table of NANC Projects/Activities
- (15) Industry Numbering Committee (INC) Report
- (16) NRO WG Questions and Concerns Regarding UNP

V. *Summary of the Meeting.*

A. *Opening Remarks.* Chairman Hoffman provided opening remarks. The March 21-22, 2000 NANC meeting minutes were distributed by hard copy for review by the Council members for approval at the Wednesday, April 26, 2000 session.

B. *NANC Assignments: FCC Numbering Resource Optimization (NRO) Report and Order.*

Uniform Definitions for Secondary Categories of Numbers. Chairman Hoffman suggested that NANC, and not the Industry Numbering Committee (INC) should work the uniform definitions for secondary categories of number usage as outlined in paragraphs 14 and 36 in the *NRO Order*. Ed Gould, AT&T, commented that the INC has the expertise to do this. Norm Epstein, GTE, added that many INC members work on the NRO Working Group as well and that the terms the FCC uses are similar to what INC worked on in the past, although the category of intermediate numbers contain some new concepts as well.

It was suggested that the uniform definition assignment be given to the NRO WG for delivery by the June 20-21 meeting with a progress update at the May 23-24 meeting. Brian Baldwin, NRO WG Co-Chair stated that INC has some overlap and suggested that INC should provide NRO with what has been completed to date on the definitions. Some of the INC guidelines contain glossaries and it would be helpful to have INC point NRO to those documents. Chairman Hoffman suggested that the NRO WG provide a direction letter to the INC stating its request.

Maria Estefania, ATIS, offered assistance to anyone experiencing difficulty using the ATIS web page to contact her and she will find someone to assist with web site problems.

Reporting Forms. John Manning reported that, pursuant to paragraph 52, NANPA was directed to provide forms directly to the FCC within 15 days of release of the *NRO Report and Order*. The draft forms were provided to the FCC as directed. However, there is an ongoing dialogue with the FCC for clarification on and modification to the submitted the forms. There have been some changes to the forms and the FCC advised that forms would not be released until they are finalized in order to minimize confusion within the industry. Gilbert Orozco, SBC stated that the industry needs the forms in order to develop requirements as soon as possible.

Data Entry Mechanisms. John Manning stated that NANPA was directed in paragraph 53 to develop and establish the data entry mechanisms within 45 days after publication of the *NRO Order* in the Federal Register. Mr. Manning stated it is critical that the forms are done and data elements are located before flat file design can be accomplished. This is fundamentally different from COCUS today – this method will facilitate online data entry for the new COCUS form. Electronic file transfer (EFT) and flat file are a common data mechanism that is used today and requires development by NANPA to create interfaces.

Carl Hansen, VoiceStream, stated his concern with transfer instructions that may not be available until 6/15 and service providers will need to put programmers to work on the interface. Paul Hart, emphasized that companies must have final documentation and technical capability to meet the filing requirement by August 1, 2000. Karen Mulberry, WorldCom questioned whether NANPA is using a standard approach to flat file and EFT, that it could share now? Mr. Manning stated that with respect to the EFT interface that NeuStar is working the FCC to get this moving as soon as possible.

Criteria for Inconsistent Submissions. Mr. Manning stated that the NRO WG is examining algorithms, which will help evaluate whether service providers' submissions are consistent. Based on the results, NANPA may request clarification or additional information from service providers. Mike Whaley, Co-Chair, NRO WG added that the details of this issue would be discussed during the NRO WG report.

Cost Estimates. As directed in paragraph 56, the NANC CRWG has been working with NANPA to develop an estimate of the costs that NANPA will incur to carry out the mandatory reporting requirements, within 30 days of release of the *NRO Report and*

Order. Mr. Manning reported that NANPA has worked with the CRWG on some estimates over the last few weeks. Gilbert Orozco, SBC stated that the cost estimates, are the costs that require NANPA to be compliant with FCC rules, and questioned whether NeuStar knows what its cost will be to create the new COCUS reporting. Mr. Manning stated that NANPA was involved with the CRWG to develop costs, however, there are open issues and clarifications that have prevented NANPA from being ready to provide an estimate for the cost of the new COCUS.

Pooling IMG. Karen Mulberry reported that the IMG is scheduled to meet with FCC staff on May 2, 2000. INC has been working on the revisions to the guidelines, which are on track for completion by June 2000. Norm Epstein added that there are some outstanding questions for the FCC from the INC and advised that INC has two interim and one normally scheduled meetings planned to complete the guidelines work.

Unassigned Number Porting (UNP). Paragraph 231, *NRO Report and Order*, requests that NANC in conjunction with the states, NARUC and INC continue to study ITN and UNP and forward their recommendations by January 2001. Chairman Hoffman noted that currently UNP is permitted on a voluntary basis between consenting carriers and opened the discussion regarding whether or not UNP is a solution that will extend the life of the NANP. Karen Mulberry, WorldCom stated that the UNP Ad Hoc group held a meeting and will give a report with recommendations and approaches. Norm Epstein noted that UNP will be discussed during the INC presentation later in the day and added that the INC UNP work is progressing with a draft document. Chairman Hoffman noted that this item has the longest time frame on it, and suggested that NANC should assign it to someone to follow-up and come to a conclusion before January 2001, as to whether UNP should be expanded beyond consenting carriers.

Beth Kistner stated that paragraph 231 requests NANC to continue to study both ITN and UNP, however there is nothing going on with ITN. Mr. Epstein advised that INC has begun work on UNP but has not received many contributions on ITN; both are open issues at INC. Ms. Kistner further stated that the FCC January 1, 2001, deadline allows for a detailed report on these issues; but NANC may have to take a more proactive role in the assignment because INC is contribution dependent. Chairman Hoffman questioned who should be responsible to work with INC to be sure this gets done. Carl Hansen questioned whether UNP is going to be worth the effort to expand the life of the NANP and stated that the FCC is looking for a technical analysis.

Ad Hoc Group – UNP. Ms. Mulberry provided a brief read out of the Ad Hoc meeting held on April 12, 2000. There were 22 attendees representing the ILEC, CLEC and cable industry as well as the state commissions. Details of the MCI WorldCom and Focal trial were discussed and individual service provider concerns were identified; issues and concerns with applications in a pooling environment, and systems requirements were raised. The group reached agreement on an approach to develop and document a business rule model first and intends to share the model with NANC and the industry. (*See Handout #2*)

Chairman Hoffman stated that with regard to small quantities of carrier to carrier UNP exchanges, etc., FCC has given authority to do that. Can or should it be done on a larger scale to extend the life of the numbering plan? The Ad Hoc model is primarily the model for small number of requests between consenting carriers and questioned whether such a model would provide insight into the impact of UNP industry wide? Chairman Hoffman suggested NANC formalize the ad hoc group into an IMG. There is a belief that UNP may have some usefulness, *i.e.*, CLEC entry into a market where numbers are scarce. Ed Gould added that he sees complementary aspects and noted that business casework is better done by the Ad Hoc with complementary work with INC.

Paul Hart questioned whether the 25 limit on the number of numbers ported is voluntary or mandatory. Ms. Mulberry stated that the absoluteness of the request was not addressed but anticipates doing so when business model parameters are defined. Mr. Hart added that the absoluteness of the limit is a threshold issue. Chairman Hoffman questioned whether there is a benefit to making UNP mandatory. Jim Castagna, Bell Atlantic commented that the UNP ad hoc group had a very active and informative discussion and suggested expanding the Ad Hoc scope to find approaches that the FCC is looking for that are feasible and that will extend the life of the NANP. Mr. Castagna suggested elevating the ad hoc group to an official NANC IMG with the goal to be aligned with what is stated in the FCC *NRO Order*. Ms. Mulberry added that the Ad Hoc will continue to work the business rule aspect and report out the results in the form of a contribution to the proposed IMG.

Dan Hochvert questioned in what context the FCC is interested in expanding the life of the NANP. If UNP and ITN are shown to have sufficient promise and feasibility, in the context of some significant extension to the life of the NANP, what would the FCC expect on the implementation? It would be helpful to have some input from the FCC.

Brian Baldwin, SBC, stated that a fundamental question is whether it is voluntary or involuntary. Chairman Hoffman suggested as a first step that perhaps NANC would want to determine whether it is beneficial and whether it will extend the life of the NANC; then consider the impact on pooling and other costs. Mr. Baldwin pointed out that the NRO WG had developed a list of questions and concerns from the SBC contribution on UNP. *See Handout #16, Questions and Concerns Regarding UNP.*

Chairman Hoffman questioned whether anyone disagrees with the FCC order with regard to voluntary UNP. The issue is do we go beyond that – next step is to put together a report to address the issue of UNP on a wider scale basis, should it be required and will it effect the life the NANP. Jim Joerger stated that the elements discussed were envisioned by the ad hoc and if NANC forms an IMG, there is a structure in place – the Ad Hoc, but with an IMG there are meeting notes/minutes posted so that everyone knows what is going on.

Carl Hansen stated that the NRO WG was previously responsible for this activity and NANC should assign it back to the WG. Beth Kistner noted that the *NRO Order* refers to many tools and UNP may be complementary to other optimization tools. Let us not limit

the view of UNP whether it increases the life of the NANP or not. Chairman Hoffman agreed, but added that NANC needs to focus on extending the life of the existing NANP. Trent Boaldin, OPASTCO expressed concern about mandatory UNP and added that the language in paragraph 231 makes it optional to work on this issue. If an IMG is going to work this issue, it should be clear that its charge would be to respond only to the last two sentences in paragraph 231.

PhilMcClelland, NASUCA stated that there are fundamental policy issues if UNP is on a less than voluntary basis. There are some strong feelings on what should be allowed or correct and suggested that both groups should work together. Right now, we do not have the answer on what the scope of UNP should be.

Paul Hart, USTA agreed and added that the fundamental issue should be whether ITN and UNP have promise and feasibility. If a group is working the issue, with intent of a making a recommendation to NANC, which may result in NANC recommending a rule change, then the work effort needs to be under the direction of the NANC.

Chairman Hoffman noted that the Ad Hoc group is working on the business rule, which will help establish ground rules between carriers on a voluntary basis. The Council agreed that the NRO WG would be responsible for this work activity with input from the Ad Hoc group and INC. The NRO WG will respond to paragraph 231 within the next seven months and keep NANC apprised of its progress.

Rejected NANC Recommendations. Chairman Hoffman reviewed the items rejected by the FCC: Two 90 day reservation periods and nine month inventories for service providers. In paragraph 25, NANC was directed to reconsider fees for reserved numbers. In response to a question to FCC staff regarding the scope of charging for reserved numbers, Cheryl Callahan, Designated Federal Officer (DFO) stated that the purpose was to provide carriers an incentive to minimize the reservation period. The *NRO Order* states that charging for reservation extensions may encourage more efficient use of numbers and act as a deterrent to warehousing or stockpiling. The Council agreed to assign this task to the NRO WG.

Further Notice of Proposed Rulemaking (FNPRM). Chairman Hoffman noted that NANC was not asked to weigh in on any of the FNPRM issues. However, he opined that NANC should consider commenting in the first round only if it has something to contribute from a higher level. Dan Hochvert stated that NANC, as an advisory body may put information on the record in any shape or manner through the Chief, Common Carrier Bureau. NANC has a continuing responsibility to provide technical advice and recommendations to the FCC – but the idea of NANC filing comments would be a strange concept.

Phil McClelland stated that his group, which is studying the market based approach to number allocation (charging for numbers) held an initial conference call on April 12th to frame some of the issues surrounding the concept. *See Handout #3.* Mr. McClelland added that the group may hold another conference call by the second week of May.

Chairman Hoffman commented that perhaps this group should look at this issue after comments are filed in the NRO docket, and then decide if there are other aspects of the issue that were not addressed. That is, consider what arguments are being made and ask whether or not the FCC has what it needs to make a decision.

Issues Not Covered in the NRO R&O. Chairman Hoffman stated that was no indication in the *Order* as to when 10 digit dialing; rate center consolidation or service specific overlays would be addressed in future orders.

Barbara Meisenheimer, NASUCA asked whether paragraph 248, which addresses the matter of utilization levels is seeking two utilization measures – one is NPA based and one is a range for a particular rate center. Cheryl Callahan stated that the record did not provide sufficient information on which to set utilization levels and that is why the question is posed in the FNPRM.

Chairman Hoffman stated that it appears to be the consensus of the Council, with regard to the further notice issues, that NANC will not file comments, and suggested that NANC look at what is filed by the industry and consider if there are issues that should be addressed. Phil McClelland's group will look at the pricing issue and NANC should look at the balance of the issues.

Harold Salters, PCIA, advised that PCIA jointly filed a petition on April 21, 2000, with ALTS, VoiceStream and WinStar for an extension of time to file comments in the NRO docket. The petition seeks an extension from the May 1 and May 16 comment and reply comment deadlines until May 19 and June 9 respectively.

In response to a question raised by Gilbert Orozco as to whether the FCC has statutory authority to charge for numbering resources, Les Selzer, Network Services Division, stated that the question of whether the Commission has authority not been concluded by the FCC.

C. Assumptions IMG Report on INC NANP Expansion Alternatives. Norm Epstein provided an overview and tutorial on the INC assumptions and alternatives. INC assumes that prior to NANP expansion that the INC Uniform Dialing Plan will be approved and implemented throughout the NANP – 10-digit dialing and the elimination of the current use of the prefix “1.” It also assumes release of the “D” digit will not occur prior to NANP expansion. The two proposed network changes are not independent of one another. When the D digit is released, central office codes beginning with digits “0” and “1” are introduced, the network will no longer support 7-digit dialing.

Dan Hochvert commented that there was no transition in previous plans; it should not be taken for granted that there is a need for a transition. Chairman Hoffman questioned whether INC is focused on the effect on the public as well as the industry. Ms. Kistner agreed and added that the IMG report recognizes that the INC assumptions are based on having a transition plan. The options are technically feasible, but may be unlikely as a strategy. Chairman Hoffman commented that the industry conducts permissive dialing

before conversions take place -- for network as well as for public education purposes. Dan Hochvert stated that it is not clear whether the industry will have 7 and 10-digit dialing; in addition, "toll" may not have any concept in the future. The implementation of the SS7 did not have a transition. Also, it is important to consider the costs of these assumptions. Ms. Kistner commented that there is a lot of merit to what Dan is saying -- the industry does not know what kind of transition it will utilize, but for now there are NPA codes set aside for the transition options.

Mr. Epstein reviewed the following five options which are under consideration: (1) 4-digit NPA with a new "D" digit; (2) 4-digit NPA with new "D" digit with a 4-digit central office codes; (3) 4-digit NPA with a new "A" digit; (4) use of a national destination code (NDC), and finally, (5) 4-digit NPA with new "B" digit. See Handout #4 for further details.

Dan Hochvert noted that the date of NANP exhaust is uncertain and considering the FCC order on number pooling the driving force on NANP expansion may be the FCC *NRO Order*. Mr. Epstein stated that human factors were addressed in the various transition plans; any transition plan has to be as simple as possible. Dave Bench added that as of the last INC meeting, some of these plans have not been checked through 01+ international dialing, and that there is confusion about release and use of the D digit.

Beth Kistner stated that the Assumptions IMG will not evaluate the options themselves, that is what INC is doing. It will evaluate whether either of these assumptions are so unacceptable that INC should pull them off the table. Phil McClelland stated it is important to understand the implications of 10-digit dialing and D digit release; it is problematic to link every expansion with 10-digit dialing. If the two are linked you may create more problems. With respect to option 3A, suggesting that it does not only have to have one national destination code (NDC) digit, allowing more than one would be good if INC would consider 2 digits for NDC. Norm Epstein stated that having one or two digits does not change the assumptions.

Chairman Hoffman reviewed the NANC assignment to the IMG, which is to provide a response for NANC to send to the FCC, for the FCC to then respond to the ATIS letter addressed to all NANP member countries regarding adoption of the two assumptions as outlined.

D. Limited Liability Corporations (LLC) Report. Joanne Balen and Pam Connell provided the report to the Council on two issues: LCC merger and contract negotiations with Local Number Portability Administrator (LNPA), NeuStar, Inc. With respect to the merger, the Mid-West LLC approved merging with NAPM, LLC on March 27, 2000. This transaction is expected to be complete by May 2000. There are now six of the seven LLCs merged into the NAPM LLC. The West Coast LLC has not merged.

Regarding contract negotiations -- there is a disagreement on the coverage of pooling in existing local number portability (LNP) master contracts. The LLCs have proposed a fixed price and NeuStar has countered with a transaction based pricing scheme. The LLC

National Negotiation Team will continue with the process and will meet again in May for a 2nd round of negotiations. The LLCs believe that an agreement will be reached. The initial contracts were for a five-year period – the proposal is to simply extend the existing contracts. The negotiations have not had any adverse affect on delivery of Release 3.0.

Ed Gould suggested, in light of the contract pooling administration competitive bid decision, that perhaps the LLCs may need to confer with the FCC. Chairman Hoffman suggested that the LLCs consider discussing the proposed path forward with the FCC staff. Ms. Connell offered to brief the FCC on the concept.

E. North American Numbering Plan Administration (NANPA) Report. John Manning provided the report to the Council beginning with an update on the state specific CO Code administration processes and procedures. Mr. Manning reviewed the recent changes in California and Illinois. California has directed NANPA to submit a lottery bid to assume administration of its lottery, and has changed the lottery allocation. In a draft decision, California has proposed a 75% fill rate and has revised its “imminent” exhaust criteria. Mr. Manning noted that some of what California is proposing is outside the scope of existing assignment guidelines. *See* handout #6 for further details.

Procedurally, NANPA has been notifying the Chief, Network Services Division and providing a copy to Chairman Hoffman when such changes are imposed on NANPA or when a state commission ask the NANPA to take actions that are outside of the industry guidelines.

Illinois issued an order in March 2000, which among other things requires NANPA and NeuStar (the pooling administrator in Illinois) to provide a list of code holders in the 847, 630, 773, 312 and 708 NPAs, and requires quarterly reports.

Cheryl Callahan, DFO stated that we are in a transition period until the *NRO Order* is effective, the states with delegated authority may continue to exercise that authority.

Lori Messing, CTIA commented that reconciling the delegated authority matters with the *NRO Order*, particularly with the utilization reporting requirements will be difficult. Chairman Hoffman added that state commissions are now seeking more information from NANPA generally, as a heads up in advance of a problem. Bill Adair, SBC questioned with regard to fill rates for carriers, whether carriers will be required to meet a utilization level in a particular state, will it be consistent with the FCC order. Chairman Hoffman noted that the establishment of utilization thresholds is an issue in the Further Notice. In the meantime, states with delegated authority to do so, may set utilization levels.

New York CO Code Application Review. Mr. Manning explained that New York and NANPA have agreed to conduct, on a trial basis, review of all CO code applications. This is not covered in the guidelines. This is a trial only – NANPA is not ready to

implement this type of trial in any other state until it can understand the throughput and costs associated with it, *i.e.*, does it help or hinder process.

Karen Mulberry, WorldCom, expressed concern for potential delays in the assignment process and questioned what affect this trial will have on the effective date of the code. Mr. Manning stated that New York has agreed to stay within the INC guidelines 10-day response time. The PSC will receive a copy of the application and NANPA will delay assignment of the code for a 5-day period; if there is no request to suspend or deny the code then NANPA will make the assignment to the applicant. The criteria for review is the same as it has been, each applicant must provide a months to exhaust (MTE) worksheet and be certified.

Beth Kistner questioned whether there is some additional criteria that the PSC are applying here; in Arizona the ACC reviewed all applications of 5 or more and directed NANPA not to make the assignment until advised to do so. This is not an effective process from a business standpoint.

Chairman Hoffman noted that the ACC situation is different – New York’s process is a heads up to flag potential problems. Commissioner Dunleavy added that New York will not act in an arbitrary or capricious manner. Greg Pattenaude, NARUC further explained that New York received delegated authority to review CO code requests and to establish utilization levels which has been set at 75%; the fill rate was announced in a March 17th PSC order. Carl Hansen commented that the fear is that industry will be subjected to 50 different criteria.

Jim Joerger, WorldCom questioned whether there is a utilization check for non-pooling capable carriers. Mr. Pattenaude confirmed that the Part One and the MTE (which is part of the Part 1) are used. Karen Mulberry commented that there is value in uniformity, and that it is difficult for a national carrier to plan for obtaining resources with differing rules in each state. Chairman Hoffman stated, on the issue of non-LNP carriers and requirements for utilization information, that this is an issue between the service providers and the states.

John Manning stated that if California’s proposal is adopted, then NANPA will need direction from the FCC. The New York trial situation is different, in that there is delegated authority to review CO applications; however, NANPA does not have the time or the resources to do this for every state.

Arizona Commerce Commission (ACC). Mr. Manning stated that the large code request (15) has been resolved and the assignment, although reduced has been made. However, the ACC still has its review process requirement in place, although it does not have delegated authority. The Common Carrier Bureau has been advised that this is still unresolved. Larry Krevor, Nextel stated NANC should advise the FCC on this matter – there is difficulty in lack of uniformity. Chairman Hoffman questioned what would the role be – if the national threshold is 50% and the state is 75%, should there be a dual standard? An entity like NANC does not have the standing to challenge this process.

Cheryl Callahan, DFO stated that the FNPRM the FCC proposes to set utilization levels and seeks comments on what those levels should be. With respect to Arizona, the ACC had some legitimate concerns that we have tried to resolve with it.

COCUS 2000 Update. Mr. Manning reported that as of April 19th NANPA has received 1297 COCUS submissions. NANPA has modified its process to track service provider submission by NPA in the COCUS database. Beginning May 8, 2000, code applicants must have a COCUS submission on file or the application for the numbering resource will be denied and the service provider will be notified.

NPA Inventory Report. Mr. Manning provided a breakdown of the 800 possible NPA combinations, subtracting 125 which are unassignable or that have been set aside for special purposes, leaving 675 as assignable. Of the 675 assignable NPAs, 321 are assigned and 281 are in service. Of the remaining, 354 are unassigned of which 48 are easily recognizable codes (ERCs) allocated for non-geographic use and 306 are considered general purpose codes. Out of the 306 general purpose codes, 271 are reserved, leaving 35 available. The reserved codes are NPA codes identified and set aside for NPAs that, based on COCUS data, the NANPA predicts will exhaust within the next 20 years. This also includes 20 additional codes as requested by the Canadian Radio-Television and Telecommunications Commission (CRTC). A copy of the CRTC March 2, letter is included in the handout. This matter will be discussed between the FCC and CRTC on April 26th.

Bill Adair questioned whether the reserved NPAs that are set aside for NPAs predicted to exhaust within 20 years, if exhaust projections change does NANPA adjust the available NPAs accordingly? Mr. Manning affirmed that NANPA does make an adjustment. Karen Mulberry stated that WorldCom wanted to understand that the actual status of the NPAs in the NANP considering the length of time the 271 codes are reserved for a 20 year process and 80 have been set aside for potential NANP expansion. A breakdown of codes by NANP country would be of value. Mr. Manning agreed to provide a break down before the next meeting, and added that some NPAs are expected to exhaust multiple times during the next 20 years.

Bill Adair stated that it would be interesting to see how many are reserved for the next relief project in a specific NPA. In response to a question of how number pooling may effect the projection of exhaust in 20 years, Mr. Manning stated that NANPA will use the COCUS data as of 4/1/00 to do a straight line projection for exhaust of each NPA.

Carl Hansen observed that the NANP exhaust project of approximately 16 months ago had a high degree of correlation, stated that the NANP would exhaust in 8 years. The effect of thousands block pooling was to forestall NANP exhaust. Dan Hochvert stated that the COCUS straight-line projection does not have any direct correlation with the use that NANPA identified in its earlier study. Chairman Hoffman stated that NANC will see the NANP exhaust report at the June meeting. Paul Hart, USTA stated that NANC needs to get a better understanding of the exhaust projection – if the projection is 2008, clearly all the NPAs will be gone before the end of the 20 years.

Approval of NeuStar Neutrality Auditor. The firm of Ernst & Young has been selected as the independent auditor to conduct the quarterly neutrality audits as required by the FCC NANPA Transfer Order of November 17, 1999. The Council agreed with the selection. Additionally, NeuStar has established a neutrality complaint process, which ensures that all related correspondence, which is tracked, is directed to the Neutrality Officer immediately. *See* handout for additional details.

NPAC Release 3.0. The original date for completion of integration testing was April 21, 2000, due to a higher than predicted rate of defects, NeuStar believes additional time will be required to complete this test phase. It is now expected to be completed by May 10, 2000, a delay of 20 business days.

Chairman Hoffman stated with regard to the non-disclosure agreements (NDAs), that he is waiting for a response to his request to NeuStar's counsel that it not send any more materials to NANC that would require an NDA. Cheryl Callahan, DFO added that, as directed by the Office of General Counsel, that all materials relating to the development of the PA requirements be returned to the FCC; these materials have been coming in both electronic and paper form. It would be helpful if the sender would download the information on a diskette and provide a memorandum describing the content. Once a copy of the materials are made, the electronic copy should be destroyed.

F. Assumptions IMG Report. Beth Kistner, Co-Chair provided an update to the Council on the IMG's progress and a copy of its draft report. *See* handout #7. Ms. Kistner stated that the IMG has had good participation by state commissions as well as cross-section of the industry. The recommendations are being drafted and will be reviewed on the next conference call.

Dave Bench, referring to section 4 of draft report, stated that to identify all the uses of the D digit and clearing the D digit would very difficult. Ms. Kistner commented that the time that would take to clear the D digit may not be worth it. Karen Mulberry suggested adding a disclaimer to the report and recommendation to state that the recommendations therein only apply to the United States. Ms. Kistner agreed to take the suggestion back to the IMG. NANC members will be notified of the next IMG conference call

G. North American Numbering Plan Administration (NANPA) Oversight Working Group. Pat Caldwell, Co-Chair, provided the report to the Council. NANPA OS WG does not have a formal report this month. Resources focused on the NANPA performance report. The WG will return to the auditor requirements document after completion of the performance evaluation which will be presented to NANC at the May 23-24, 2000 meeting.

H. Numbering Resource Optimization (NRO) Working Group. Beth O'Donnell, Co-chair announced the NRO's selection of two new co-chairs Brian Baldwin and

Eleanor Willis-Camara and the Council confirmed the selection. Ms. Willis-Camara provided the report read out to the Council.

Lori Messing expressed concern with respect to the seasonal nature of wireless demand for numbers and predicting overall demand for numbers and the suggested reasonableness test. Brian Baldwin stated that the test is reasonableness test on the service provider's forecast; if an anomaly is detected the carrier would be contacted. Carl Hansen questioned whether the algorithm makes any accommodation for a new entrant, and noted that wireless companies have a peak season during the end of the year and new entrants have no history. Mr. Baldwin stated that initial codes are not subject to the reasonableness test.

Ed Gould commented that purpose of the algorithm tool is to motivate better forecasting by service providers. Ms. O'Donnell stated that the specific language on the reasonableness test is on the NRO web page and that the WG is developing this as a tool for NANPA use. Ms. Messing requested that more of the specifics be provided and added the application of the reasonableness test may result in a work load issue for NANPA. It would be helpful to have a more in depth understanding of the algorithm; what is it being compared to? Brian Baldwin stated that the comparison is for a like period of time. Council members agreed that a full explanation of the reasonableness test should be provided at the May NANC meeting. Ms. Willis-Camara stated that the NRO would provide a plain English explanation of the reasonableness test with some sample results at the next meeting.

Pooling Matrix. The WG questioned whether it should continue to manage the pooling matrix in light of the NRO Order. Chairman Hoffman commented that he thought the matrix was very useful and probably to the FCC as well and recommended continuing to maintain it. Beth O'Donnell stated currently only 3 states have pooling in place; the NRO needs data from other states that have delegated authority to populate the matrix. This matrix information may help gauge the success of the number pooling – which may assist the FCC in establishing and/or adjusting a number pooling roll out schedule.

Reserved Numbers. Several questions regarding reserved numbers as a result of the NRO Order are listed on page 4 of the handout. With regard to fees to be collected for reservation extensions, it was noted that some of the questions raised are the same issues being addressed by the Phil McClelland's group studying the market based approach to number administration (charging for numbers). Trent Boaldin questioned whether the Commission has the statutory authority to charge for numbers.

COCUS Requirements Document. Brian Baldwin stated that the NRO is seeking clarification on what level of input the WG will have on the design of the electronic interface. The NRO will finish up its work on the algorithm. It was agreed that the NRO does not need to work on the interface.

Carl Hansen commented that the uniform definitions are in the *NRO Order* and NeuStar is working with the FCC on the interface and the forms; the CRWG is working on the

cost estimates. The algorithm is assigned to the NRO WG. Beth O'Donnell asked whether NANPA will just tell the industry how much it costs to do the new COCUS. Chairman Hoffman stated that NeuStar or NANPA has to come back to the NANC with any request for a price increase over and above the existing contract.

Anne La Lena commented that there is a difference between the estimate of the cost of COCUS and a cost increase request from NANPA to cover the enhanced function. Chairman Hoffman stated that this is a question of how much and who pays.

Karen Mulberry commented that the industry should be involved in the development of the COCUS interface. Chairman Hoffman added that NANPA has 45 days after the effective date of the NRO Order to design the interface. Additionally, the new COCUS requirements would become part of the next NANPA Requirements Document and subject to competitive bid. Ms. O'Donnell stated that the previous assignment deadline of June 2000 for NRO WG to produce the COCUS requirements document is now suspended in light of this discussion.

I. Local Number Portability Administration (LNPA) Working Group Report. Co-Chairs Charles Ryburn and Brian Egbert provided the report to the Council. *See* Handouts #9 and 10. Brian Egbert reviewed the Wireless Number Portability Subcommittee (WNPSC) key issues and action items. The WNPSC has completed a review of the second draft Wireless Number Portability Report. With regard to the NPAC 2001 testing schedule the consensus is that inter-carrier testing should be performed in a production environment. Preliminary discussions were held with NENA representatives to identify the information provided to PSAP by wireless service providers under Phase 1 and LNP implementation under Phase 2. A response from TR45.2 regarding the jurisdictional identification parameter (JIP) indicates that the JIP is feasible and can be accommodated by the standard. A copy of the WNP timeline for Phase 2 for the year 2000 was provided.

Charles Ryburn provided a read out on the wireline/wireless integration report progress; NPAC/SMS release status; Problem Identification Management (PIM) process and Slow Horse update. The WG continues to research the question of whether the mixed service period creates a significant harm to E911. NENA is assisting with this issue and has requested that a standardized process that would document the responsibilities of both the old and new service provider in a wireline to wireless port.

NPAC/SMS Testing. Release 2.0. – with the implementation of pooling in California, invalid data has been sent to the pooling administrator causing rejection of some pooling requests because of invalid data. Release 3.0 – there will be a 4 week delay in the start of service provider testing; the new date is July 31st.

Mr. Ryburn announced that Donna Navickas, Chair of the Number Pooling sub-team has stepped down. The sub-team has not yet decided whether to appoint a new chair because with the implementation of Release 3.0 the need for a separate team may not be necessary. Number pooling issues will be worked by the entire LNPA WG. The

statement of (SOW) for Release 4.0 was released to all the LLCs on April 28th. See page 2 of handout #9 for a list of the change orders contained in Release 4.0.

PIM Report. PIM 0005 – The WG is defining inadvertant port event, *i.e.*, a port that occurs due to a typo or a TN in range that should not be there. This PIM is asking for the NPAC to do the port back to correct the error. Shelly Shaw, Nextlink stated that a porting error sometimes occurs when the range of numbers is too big. Beth Kistner asked whether there is anything LNPA WG could do to broadly disseminate this information. Mr. Ryburn added that there is a PIM section on the WG web page at NPAC.com. Ms. Shaw suggested that perhaps resolved issues could be transmitted and offered to consider that option and provide follow up at a later date.

PIM 0006. NENA has suggested that the 911 database due to LNP be updated within a 24 hour period of NPAC activation. NENA has also requested that the End User Move Indicator (EUMI) on the LSR be a made a required field. This would resolve the issue of the old service provider knowing when to perform a delete transaction when the end user is actually changing location during porting.

Slow Horse. The subcommittee has finalized the “Availability” requirement and it should be presented to NANC for approval at June 20-21 meeting.

Ed Gould questioned why there is difficulty in one state (California) with Release 2.0 when it has not been problematic in Illinois. Barry Bishop, NeuStar stated this is mainly due to the fact that there are new carriers in California and a different pooling administrator – overall it is a training issue and communication problem.

J. Cost Recovery Working Group Report. Anne La Lena, Co-Chair provided the report to the Council. NBANC is now collecting approximately \$8.2 million – the CRWG is recommending to NANC that the amount be reduced to \$4.1 million, as a result of the FCC decision to use a competitive bid process for selection of the pooling administrator in the 4th quarter 2000. Ms. La Lena reminded the Council that NBANC does not have any recourse for a line of credit. Additionally, the \$8.2 amount should not be regarded as a floor or ceiling cost of pooling.

Audits. The CRWG originally recommended \$700K for audits and now recommends cutting that amount to \$350K due to the timing of anticipated 3Q00 FCC Order addressing audits. Based on this timing, the first audit likely will begin in Spring 2001.

Disposition of Monies Billed. The CRWG recommend that NBANC be advised to refund any excess money.

Flexible Use of Monies Collected. The CRWG recommends granting NBANC discretion regarding use of monies. Should underpayments occur in one category and larger payments are necessitated in another category, NBANC would immediately advise the NANC and the CRWG if such a need arises.

The Council reached consensus to adopt all four recommendations.

COCUS Replacement. Paragraph 56 of the *NRO Order* directed NANC to consult with the NANPA to develop an estimate of cost the NANPA will incur to carry out the mandatory reporting functions. NANC was directed to submit the cost within 30 of release of the order. With the release of March 31, 2000, Ms. La Lena stated that the CRWG only had 17 working days to produce a very high level estimate.

The CRWG recommends that \$203K be included in the contribution factor as a COCUS replacement tool estimate for FY 2001. The \$203K assumes \$25K for possible hardware costs; \$28K for temporary labor for data entry; \$75K for data analysis; \$1K for data reports; \$1K for database access for State Commissions and Pooling Administrator(s). The NBANC has to file a factor adjustment with the FCC in early May.

John Manning stated that NANPA had participated in the estimates and it is NANPA's view that the CRWG estimate is low. There are a number of variables that remain unanswered – the CRWG went with what they had. Beth Kistner commented that she would like to have funds available to cover the eventual bill that will be submitted. Chairman Hoffman noted that even with the recommended reductions, NBANC would still have \$4.5 million.

Ms. La Lena will draft a letter for Chairman Hoffman's signature to NBANC, which will convey the NANC consensus to adopt all four recommendations.

K. North American Billing and Collection (NBANC) Report. John Ricker, Chief, Executive Officer, NBANC provided the report to the Council. NBANC will make a filing with the FCC to revise the contribution factor, which will reduce the surplus by approximately \$4 million. The proposed revised contribution factor will be 0.000043.

NANPA Fund Performance Status Report and Fund Projection. The current fund balance is \$6.9 million; projected receivables are \$10.6 million (for year 3). Payments to NeuStar to date total \$404K for year 3. Payments to NECA in year 3 total \$24.1K; Board expense for year 3 total \$1.3K, and projected payment to an external auditor of \$22K.

Delinquencies. NBANC has contacted by telephone all companies who owe contributions over \$1K. NBANC will follow up with a letter. Reporting of by carrier segment is used by the USAC Board to monitor late and delinquent payments. Beginning in May, NBANC will utilize that format as well.

April 26, 2000

L. Approval of Meeting Minutes. The March 21-22, 2000 NANC meeting minutes were approved with edits.

M. Table of NANC Projects. Tony Pupek reviewed with the Council the updates to the matrix based on the progress reports provided to date. The following items were revised. Item 9, cost estimate for COCUS has been completed. Item 12, development of requirements for the COCUS replacement is assigned to the NRO WG, but does not have a due date at this time. Chairman Hoffman commented that the *NRO Order* established a different COCUS and instructed NANC to work with the NANPA on the interface. The NRO WG should continue to work on the algorithm which is now on the list as a new item 21 with a due date of the June NANC meeting.

Mr. Pupek noted that NANPA is doing the COCUS now under the current contract, but part of the rebid on the NANPA contract will be COCUS function, and questioned whether it would become a stand alone element or part of the existing NANPA contract. Chairman Hoffman added that the Council should expect NANPA to come forward with an assessment of the additional costs it has to incur in order to comply with the *NRO Order* mandatory reporting requirement.

Karen Mulberry commented that the NANPA Oversight WG will begin to work on the next NANPA requirements document and will need direction regarding whether or not the COCUS function should be included or will it be a stand alone contract.

Regarding item 17, refinements of NANP exhaust model, NANPA will report on the 1999 NANP exhaust assumptions at the May NANC meeting. Dan Hochvert commented that the straight-line approach was considered an inappropriate tool 3 years ago, and stated that the algorithm for predicting NANP exhaust should be identified and on the record. Chairman Hoffman added that NANPA will report on NANP exhaust at the June NANC meeting. Carl Hansen noted with regard to the underlying assumptions used last year, that some NANC members had significant differences of opinions as to whether major assumptions were correct. The assumptions are a critical piece and can have dramatic influences on the NANP exhaust prediction.

John Manning stated that the June exhaust report results will be based on the tools available today which do not include any utilization data. It may take several reporting cycles for the utilization data to have an effect on the overall report results. Beth Kistner questioned whether there is any value in having NeuStar to identify the major inputs that the model was most sensitive to, *e.g.*, wireless or CLEC entry.

Chairman Hoffman commented that the underlying assumptions may be more important than the algorithm. Dan Hochvert expressed concern that the NANP exhaust results and press coverage may raise concern to the point of paranoia given last year's exhaust projection of 2008. NANC has an obligation to understand the result before hand by understanding the assumptions before the result is obtained. Mr. Manning added that the NANPA will not factor in pooling as a result of the major roll out expected in 2001, at this time, the implementation schedule is not known so it would be hard to gauge the impact of pooling at this time. NANPA has, for the time being, focused on NPA by NPA exhaust projects. Ed Gould observed that NANC should want to know the impact of pooling on NANP exhaust.

Two new items were added to the matrix: Items 23, the study of ITN and UNP to be reported out by November 2000, and 24, study of fees for reservation extensions beyond 45 days to be reported out at the June NANC meeting.

N. Industry Numbering Committee (INC) Report. Shawn Murphy, INC Moderator, provided the report to the Council. Revisions to the CO Code Assignment guidelines have been completed and the document will be reissued following INC 50 June 12-16, 2000. With regard to UNP activity, the INC has created a 25 page UNP working document from the contributions received from SBC, MCI WorldCom, GTE and AT&T.

1K Pooling Guidelines. INC reissued the Thousand Block guidelines with an effective date of April 14, 2000. INC has obtained permission from the Carrier Liaison Committee (CLC) to use an expedited process in order to further revise the guidelines to reflect changes mandated in the FCC NRO Order. This work should be completed by June 20, 2000. Mr. Murphy reviewed the list of questions for clarification directed to the FCC regarding thousand block pooling, *i.e.*, contamination levels, transition plans for state pooling trials, and whether the 45 limit for reserved numbers refers to calendar or business days. *See #15 handout for details.*

Additionally, Mr. Murphy read a list of questions for clarification regarding CO Code assignment guidelines and COCUS reporting. Cheryl Callahan, DFO accepted the questions and advised that the FCC would inform the NANC how its intends to respond to the questions.

Regarding the upcoming INC meetings, the FCC staff has been invited to attend the Intern LNPA and CO/NXX workshops scheduled for the first week of May. Mr. Murphy stated that he would step down as INC Moderator at INC 50.

In response to a question regarding what activity does INC have planned for ITN, Mr. Murphy stated that ITN is being worked through the LNPA workshop.

In response to a question regarding why a service provider might have more than one OCN, it was noted that there may be state specific OCNs. NECA requires a separate OCN per state for revenue reporting purposes. Natalie Billingsley commented that a recent 310 NPA survey conducted showed multiple OCNs in the same rate center – many service providers use OCNs to segregate different business lines.

O. Other Business. None

P. Next Meeting: May 23-24, 2000.

VII. Action Items and Decisions Reached.

1. FCC NRO Report and Order Assignment. The Numbering Resource Optimization Working Group was assigned coordination of the definition development for

secondary categories of number usage as directed in paragraphs 14 and 36 of the *Report and Order*. The Industry Numbering Committee (INC) is to identify the definition work already done to the NRO WG. The NRO WG will provide a status report at the May 23-24, NANC meeting and conclude its work by June 20-21, 2000.

2. Revisions to the Pooling Administrator (PA) Requirements. INC reported, at the April NANC meeting, on its progress to modify the numbering guidelines in light of the NRO *Report and Order*. The INC directed questions to the FCC for clarification.

The Pooling IMG has a May 2nd meeting with FCC staff (Office of the Managing Director and Office of General Counsel) regarding the procurement process and the IMG's development of the technical requirements for the pooling interface. The PA IMG will provide a report of that meeting to the NANC at its May 23-24 meeting.

3. Unassigned Number Porting (UNP) and Individual Telephone Number Pooling. The NRO WG will prepare a report, for review by the November 28-29, 2000 meeting, which is responsive to the last two sentences of paragraph 231 which states:

Furthermore, we encourage the states, the National Association of Regulatory Utility Commissioners (NARUC), NANC and INC to continue to study ITN and UNP and forward their recommendations to us by January 1, 2001. We remain interested in the possibility of implementing either of these pooling methodologies as part of the national numbering resource optimization strategy if they are shown to have sufficient promise and feasibility.

The NRO WG will include input from both the UNP Ad Hoc group and the INC, and keep NANC apprised of its progress. The work is to be completed by year-end.

4. Extensions for Reserved Numbers. The NRO WG will develop a report responsive to paragraph 25, which states in pertinent part, “. . . NANC will reconsider the issue and determine whether a meaningful economic fee structure for reserved number could be developed. . . . In its deliberations, the NANC should also consider how the receipts from such fees should be used.” The report will be provided to the NANC at the June 20-21, 2000.
5. McClelland Group. Phil McClelland's group will report back to NANC concerning charging for numbers.
6. North American Numbering Plan Administration (NANPA) Report. NANPA to provide explanation of disparity between 20 year COCUS and earlier prediction of NANP exhaust.

NANPA will provide a breakdown of reserved codes by NANP country (U.S., Canada and Caribbean) by existing NPAs.

NANC approved NeuStar selection of Ernst and Young as auditor for purposes of the quarterly neutrality audits required by the Code of Conduct.

7. Assumptions IMG will give final report in May.
8. Numbering Resource Optimization Working Group Report. At the May 23-24 NANC meeting, the WG will provide a plain-English explanation of the proposed reasonableness tests to determine when carrier requirements (forecast and utilization) are out of line. Sample industry results by industry segment will be included.
9. Cost Recovery Working Group. Anne La Lena will draft 2 letters for Chairman Hoffman's signature to Chief, CCB and a letter to John Ricker, NBANC regarding NANC action on CRWG's option (3) recommendation to authorize collection and disbursement of funds.
10. Changes to Table of NANC Projects Matrix. Item 14 was removed, and other detailed changes were made to entries. The revised chart will be made available by distribution with the action items.
11. John Manning will describe the NANPA methodology used to project NANP exhaust at the May NANC meeting. NANC will discuss further whether NANPA should make a projection of NANP exhaust using the COCUS 2000 data.
12. Industry Numbering Committee (INC). Questions were directed to the FCC regarding the NRO Report and Order. The FCC staff will respond as soon as possible.