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NANPA

# ANNUAL PERFORMANCE EVALUATION

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Evaluation Period:

January 1999 through December 1999

Prepared for the Federal Communications  
Commission by the North American  
Numbering Council

July 18, 2000

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### Executive Summary

The NOWG's performance evaluation of the NANPA for 1999 was carried out to monitor their performance and to provide the results to the NANC and FCC. Based on the evaluation and assessment of a variety of inputs, the NOWG has concluded that the NANPA performance for 1999 was "above average". This rating is judged to be notably higher than 1998's "acceptable". NANPA's efforts were commendable in responding to the 1998 Performance Improvement Plan and to enhancing many of their functions. Areas still exist where improvements are necessary and these have been identified for corrective action in 2000.

### Section 1 Introduction and Background

In the Second Report and Order and Memorandum Opinion and Order, CC Docket No 92-237 (NANP Order) released on July 13, 1995, the Federal Communications Commission (FCC) established the North American Numbering Council (NANC) pursuant to the Federal Advisory Committee Act (FACA). In addition, this order directed the NANC to recommend to the Commission and to member countries of the North American Numbering Plan (NANP) a neutral entity to serve as NANP Administrator (NANPA) and a mechanism for recovering the costs of NANP administration in the United States.

The Commission's charge that the NANC recommend an impartial NANP administrator is consistent with Congress' directive in section 251(e)(1) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996<sup>1</sup> that the Commission designate an impartial numbering administrator to make telecommunications numbering available on an equitable basis.

In the *NANP Order*, the FCC outlined several specific tasks for the NANC, whose mission, as a federal advisory body, is to provide the Commission with advice and recommendations reached through consensus to foster efficient and impartial number administration as telecommunications competition emerges. One of its first tasks was to recommend to the Commission an independent, non-governmental entity that is not closely associated with any particular industry segment to serve as the new NANPA. After a lengthy evaluation process, on May 15, 1997, the NANC recommended that Lockheed Martin IMS, Communications Industry Services (Lockheed Martin) now called NeuStar be selected as the new NANPA. On October 9, 1997, the FCC in their Third Report and Order confirmed the selection.<sup>2</sup>

The NANC was ordered to monitor the performance of the NANPA and, at the direction of the Commission, implement any remedial action necessary to correct identified problems. Section 1.6 of the North American Numbering Council NANPA Requirements Document, dated February 20, 1997, required that the NANC formally assess the performance of the NANPA on at least an annual basis. To meet this requirement, the NANC formed the NANPA Oversight Working Group (NOWG) in June 1998. The following report is the second annual NANPA performance evaluation and covers the period of January 1999 through December 1999.

This second annual NANPA performance evaluation is significantly different from the first report for the following reasons:

- NANPA is no longer in a start up mode; they are firmly and totally responsible for all number administration and code relief functions across all the designated areas within the NANP.

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<sup>1</sup> Telecommunications Act of 1996, Pub. L. No 104-104, 110 Stat. 56 (1996).

<sup>2</sup> FCC 97-372

- All the code relief responsibilities and code administration responsibilities have been transferred to NANPA over the past year.
- The environment under which this evaluation was conducted has changed dramatically from the first evaluation. Relief activities have escalated, codes have been assigned at an increasing rate, and state regulatory authorities have taken a much more active role in numbering activities compared to the previous year.
- Over this past year NANPA has undergone a change of ownership control.
- Certain outstanding and new issues have not been resolved between NANPA and the industry. These issues may impact NANPA's performance and perception by the industry and regulatory authorities.

Based on this changed environment, the present evaluation incorporates all the above circumstances, issues and situations. The input to support the findings and recommendations has been taken from annual performance surveys, NANPA feedback, NANC reports, the annual operational review, written comments from the industry, industry contributions to national forums and working groups, and the 1998 Performance Improvement Plan (PIP)(see Appendices).

## Section 2 Performance Evaluation Process

The purpose of the NANPA performance evaluation process is twofold:

1. To provide an objective assessment of whether or not baseline requirements are being met; and
2. To provide a qualitative assessment of how well the requirements are being met, including the identification of areas needing improvement.

The above were accomplished using agreed-upon performance tools with broad industry input.

The NANPA performance evaluation process, which was approved by the NANC, consisted of the following steps:

### 1. Identify NANPA Responsibilities

All NANPA requirements identified were defined in the NANC NANPA Requirements document, in Lockheed Martin's (the original responding company) proposal and associated correspondence, and in industry guidelines and applicable FCC orders.

### 2. Solicit Input

Performance feedback was solicited from all interested industry parties and state regulators. Input was provided using a performance feedback survey developed by the NOWG. The NANPA provided input in its Annual Report, at the on-site operational review, and during industry meetings (NOWG, NANC, INC).

### 3. Analyze Input

The NOWG evaluated and summarized all of the feedback. This included the quantitative survey results, written comments from the survey, and observations noted by the NOWG during meetings/operational review with the NANPA.

### 4. Develop Conclusions and Recommendations

Based upon the inputs, the NOWG identified the NANPA's strengths and weaknesses. Areas needing improvement were identified for corrective action.

### 5. Review Results with NANPA

The NOWG reviewed the performance evaluation results with the NANPA.

### 6. Present Report to the NANC

The NOWG prepared a comprehensive report for the NANC on the NANPA performance evaluation process and the results. The NANC will present the report to the FCC. All supporting documents will be made available to the FCC, NANC Chairman and the NANPA. All pertinent information is available upon request from the FCC.

## Section 3 Description of Inputs

The NANPA Oversight Working Group's performance evaluation of the NANPA was based on a variety of reports, surveys, and reviews:

1. NANPA's self-evaluation surveys gathered during industry NPA relief planning meetings;
2. On-site operational review at the NANPA's offices in Concord, California;
3. NANPA 1999 Annual Report;

4. NOWG's performance survey distributed in January 2000 to obtain industry and regulator input. The survey was used to obtain both quantitative and qualitative results;
5. NANPA's 1998 Performance Improvement Plan;
6. Documentation of NANPA's participation in and contributions to various industry and regulatory interactions.

### Section 4 NANPA's Self-Evaluation

The NANPA Requirements Document states that, "the NANPA must develop and implement an internal, documented, performance review process to be provided to the FCC upon request and at least on an annual basis." The NANPA has met this requirement. (See Appendix I – NANPA Operational Review Presentations)

### Section 5 Operational Review Meeting - Concord, California

NOWG members met with NANPA representatives at their facilities in Concord, California on February 15-17, 2000, to perform the annual operations review. The functions covered were CO code administration, enterprise services, quality performance measurements, NANPA Code Administration System, disaster recovery, reports, intellectual property rights, NPA relief planning, and mandatory enterprise audit. Highlights from this meeting are noted below. (presentations from this meeting can be found in Appendix I - NANPA Operational Review Presentations.)

#### CO Code Administration Review

- Completed the transition from incumbent administrators in 1999 including follow-up of Part 4..
- Aligned CO Code with NPA Relief Planning regions in mid-1999.
- Added 4 new Code Administrators, the total is now 14.
- Created a manual of references to verify certification of new service providers for each state and NPA.
- NANPA puts all requests through the initial screening – even repeat requests during a lottery. Change requests represent about 25% of the 42,000 Part 1 volume. Types of changes are tandem re-homes for load leveling, OCN changes to meet SP needs, switch changes, etc.

- The verification process on code requests is manual. The new NANPA system should remedy some of the manual effort through mechanization.
- NANPA established a 'benchmark' of 5 or more code requests by the same SP in the same rate center, which triggers an informational letter back to the SP with copies to the FCC and state commission. FCC notification is provided only after the assignments are publicly available (shown in the LERG).
- NANPA faces the challenge of SPs not submitting Part 4 forms and of outdated contact names..

### Enterprise Services (AOCN Part 2 Processing)

- At the end of 1999 they had 270 contracts. NANPA commented that training new clients is very time consuming.

The audit results of enterprise service were not available at the time.

### Quality Performance Measurements

It was noted that NANPA counts any missed measurement the same way, even if it is only minor or is not service impacting. A next step may be to refine the measurements to distinguish little misses from big ones.

### New NANPA Code Administration System

- The new system will be web based but will not have FTP interface capability. NOWG members pointed out the following statement that NANPA provided in the overview of their bid response:

NANPA user entities may obtain based upon their volume of interaction with NANPA, remote access to this system thereby automating the entire process of performing assignment requests. Other NANPA user entities may continue to process requests via the existing hardcopy forms (fax, mail), phone calls to the help desk with hardcopy verification, or electronically using e-mail or FTP of softcopy forms.

- NANPA initially declined to share the system requirements with the industry at this time since they feel an industry review and input would affect the system implementation time line. The next day, NANPA reversed their position and agreed to provide the document.
- It is anticipated that in July 2000 selected users could begin using the production system in order to provide feedback before general launch. August 2000 will be the system launch with industry access scheduled in September 2000.

- NANPA needs to work with the industry when developing guideline changes to ensure flow-through to the NANPA system, and to ensure that potential cost impacts can be identified early in the process.
- NOWG expressed concern about the fact that NANPA established a firm subcontract with a supplier who has not been reviewed by the industry for neutrality.

### Disaster Recovery

- NANPA has developed disaster recovery procedures using various assessment teams, each with a designated area of focus. Jeff Ganek, Chairman and CEO of NeuStar, heads up the overall assessment team that will contact NANC, INC, NOWG and other agencies to keep them apprised should the plan ever need to be implemented.

### NANPA Reports

- NANPA currently produces over 100 reports for regulators. If any specific SP information is sent to a state regulator, NANPA requires the state to sign a non-disclosure agreement with NANPA before the data is sent.. The SP is notified when any of its specific data is sent to a regulator.
- NANPA has been asked to provide regulators with as many as 20 individual reports per month. NANPA hired a full-time, dedicated report manager. NANPA stated that the average time to generate reports and respond to data requests is 8.5 hours per report.
- Cost of producing reports was covered very loosely in the NANP requirements document. Reports for regulators may have to be reviewed by NANPA in the future due to the current demand and the amount of time required by NANPA to gather and produce the requested reports.

### Intellectual Property Rights (IPR)

- Both NOWG and NANPA concluded that a common understanding regarding IPR could not be reached. As a result of this meeting, the issue was forwarded through the NANC to the FCC for resolution.

### NPA Relief Planning

- Performance measures show steady improvement in quality of performance. However, one area of concern was getting meeting minutes out on time.
- All measures have a target of 100%, and NANPA views this as a reasonable goal. Missing a target by an inch or by a mile constituted a miss. It was noted that perhaps it was time to establish new internal measurements. The industry should participate in this effort in order to ensure that the measurements are meaningful to both the industry and NANPA.

### Mandatory Enterprise Service Audit

- NANPA is required to have an audit performed covering the first year of mandatory enterprise service. This service, performed under the terms of the Requirements Document, is to input data to BRIDS, BRADS, and RDBS for a fee. NANPA stated that the audit was performed in January 2000 and detailed findings from the auditor were to be delivered directly to NOWG.

## Section 6 NANPA 1999 Annual Report

NANPA is required to produce an Annual Report in compliance with Section 9.6.2 of the NANPA Requirements Document. Specific requirements for this report are as follows:

### 9.6.2 North American Numbering Plan Administration Annual Report

This document is published annually to report on the status of NPA and CO Codes as a public resource. Its publication should coincide with receipt of the results of the annual COCUS survey and may be a part of the NANC annual performance review process. The annual report will contain at a minimum, but not be limited to:

1. Brief Description of the North American Numbering Plan
2. Highlights/significant milestones reached during previous year
3. Current NPA Code Listings - Alphabetical by State/Province and Numerical
4. COCUS forecast results - Current Year Forecast
5. NPA Codes Projected to Exhaust for 10 year forecast period
6. Status of NPA Codes planning or in relief planning
7. Dialing Plans
8. Description of all Numbering Resources assigned by the new NANPA and appropriate point of contact to obtain
9. Appendix of Reference documentation to assist numbering resource users

NOWG noted that items 1 and 2 above were included in the 1999 Annual Report, but items 3 through 9 were not. The items that did not appear in the Annual Report may have been made available on NANPA's web site, on the NANC Chair web site, or in other related industry locales. The 1999 Annual Report actually contained the following items:

1. How NANPA is funded
2. NANPA and NeuStar staffing
3. Code administration overview, accomplishments, staffing, Part 4, responsiveness, reports, activities, performance measures, code admin system, road ahead
4. NPA relief planning overview, accomplishments, performance measurements, customer survey feedback, issues, road ahead
5. Enterprise service (this section includes a notation that the results of this audit will be given to NOWG)
6. 1999 financial results related to the enterprise service
7. Web site
8. COCUS process (but no results)
9. Conclusion

## Section 7 Enterprise Services

### Mandatory Enterprise Service

NANPA is required to offer Administrative Operating Company Number (AOCN) service to industry members. This operation is critical as it populates major industry databases. The industry relies on these databases to configure the network for the proper routing and rating of calls, and if the necessary information is not input correctly and in a timely manner, calls cannot be routed/billed to newly assigned codes.

The NANPA 1999 Annual Report stated that net revenues for this AOCN enterprise service amounted to approximately \$485,000; this income equates to approximately an additional 10% above the current 1999 payments to NANPA for their overall industry services. NANPA provided AOCN service for more than 270 clients, which was up from 237 in 1998. The current fee that NANPA charges to enter or change data associated with a central office code assignment is \$53.46.

The audit of this mandatory enterprise covered service performance, billing comprehensiveness, and maintenance billing accuracy. The procedures were agreed to by NeuStar and the NOWG and were performed by an independent auditor in accordance with the standards established by the American Institute of Certified Public Accountants. A random sample of 60 central office codes was examined.

Based on the independent accountants' audit conducted by Blanding, Boyer & Rockwell, discrepancies were noted in 12 of 18 audit elements and can be characterized in these areas:

- accounts receivable versus payable
- conformance with industry guideline requirement for timely data input
- errors in data entry

The NOWG has concerns regarding the discrepancies reported and recommends that the NANPA develop a performance improvement plan to address these elements. In addition, the web site instructions to prospective industry clients do not clearly state that the service is an obligation of the NANPA; the page heading is "NPA Jeopardy" and could lead the reader to believe that the AOCN service only applies in jeopardy situations. And, there is confusion as to the identity of NANPA. These statements appeared on [http:// www.nanpa.com](http://www.nanpa.com) (as of April 5, 2000):

- If a code holder wishes and if a contract is signed, NeuStar Inc. – NANPA ("LMIMS") will enter "Part 2" data for you.
- For more information about having LMIMS–NANPA input Part 2 data, contact:

NANPA AOCN Contract Administrator, NeuStar Inc.

### Optional Enterprise Services

The NANPA is permitted, with FCC approval, to offer enterprise services, which are for-fee services over and above their basic responsibilities. The NOWG noted that at least one state commission approached NANPA to run the jeopardy code lottery.

## Section 8 Quantitative Analysis

### Background

This summary of the numerical responses for both the state commissions and the industry is not intended to present a complete picture of NANPA's performance in and of itself. Numerical rating surveys almost always have some bias built into them. Because of this, the numerical results should be considered in conjunction with the qualitative results. Specific questions and ratings did not limit comments, so the qualitative analysis covers a broader spectrum of issues and more specifically identifies issues.

### Overview

Public comments were requested by the North American Numbering Council from any industry participant or regulatory body as input to the evaluation of NANPA. Responses are on the survey form prepared by the NANPA Oversight Working Group or were presented during the Operational Review conducted by NOWG. There were a total of 14 state commissions that responded.

One of the commissions provided comments without numerical ratings. There were a total of 71 replies from 51 industry participants. Some companies provided multiple responses to each survey question in section A and section B due to the type of NANP resource requested and by having more than one person handling different types of NANPA contact.

The following analysis is of the numerical surveys only. In addition, the surveys asked for specific comments concerning NANPA performance. These comments are summarized in the Qualitative Analysis Section 9.0. Ratings were solicited in three sections: Number Administration, NPA Relief Planning, and Overall Assessment of NANPA. There were 18 questions in the survey but not all respondents answered all questions because many had experiences in some areas but not in others or provided multiple ratings on only one section of the survey. The results are analyzed for each question below based on the following scale:

**1. Very Dissatisfied; 2. Dissatisfied; 3. Neither Satisfied nor Dissatisfied**

**4. Satisfied; and 5. Very Satisfied**

The analysis includes all responses even though there were multiple replies from some companies. This was done in order to capture the largest possible base of respondents. Even with multiple replies, there were not enough from any single company to significantly change the results. Because of the different type of relationship between NANPA and

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state commissions versus NANPA and industry participants, the responses are summarized separately.

### Section A – Number Administration

Indicate the type of resource(s) involved, e.g. CO Code, CIC, 900, 500, 555.

State Commission comments were identified as applying to the following categories:

Co Code – 3

General Information – 7

Other – 1

Three state commissions did not provide any specific category designation. No other resources were cited.

Industry participant comments were identified as applying to the following categories:

Co Code – 54

CIC – 8

900 – 1

500 – 4

555 - 3

Other – 12

No designation noted - 2

Interaction with the NANPA was associated with assignment request, transfer of assignment, general information request, or other.

The commissions and industry participants indicated their ratings were based on the interaction(s) shown in Table 1.

Table 1: Interaction Activities

	<i>Commissions</i>	<i>Industry Participants</i>
<b>Assignment Request</b>		51
<b>Transfer of Assignment</b>		26

<b>General Information Request</b>	5	36
<b>Other or No Indication Given</b>	9	

1. NANPA responded to my inquiry within the same day or at most by the next business day.

**State Commission Responses:**

Eight of the 14 commissions responded to this question with an average rating of 3.6. There was one commission who responded with a one but provided no comments. Five commissions gave ratings of 4 or 5.

**Service Provider Responses:**

For CO Code, 59 of the 71 respondents answered this question with an average rating of 4.2. Fifty of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.9; 900 – 5.0; 500 – 4.2; 555 – 5.0; and Other – 3.3.

2. NANPA demonstrated appropriate knowledge of the numbering resource.

**State Commission Responses:**

Nine of the 14 commissions responded to this question with an average rating of 3.7. There was one commission who responded with a one but provided no comments. This same commission also gave a rating of one to question 1. Seven commissions gave ratings of 4 or 5.

**Industry Participant Responses:**

For CO Code 57 of the 71 respondents answered this question with an average rating of 4.3. Fifty-one of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.8; 900 – 3.0; 500 – 4.2; 555 – 4.0; and Other – 3.6.

3. NANPA was familiar with the processes required to fulfill my request.

State Commission Responses:

Five of the 14 commissions responded to this question with an average rating of 3.2. The same commission that gave low ratings to questions 1 and 2 also rated this question as a one. Three commissions gave a rating of 4 or 5.

Industry Participant Responses:

For CO Code 57 of the 71 respondents answered this question with an average rating of 4.3 Fifty-one of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.7; 900 – 4.0; 500 – 4.6; 555 – 4.7; and Other – 4.5.

4. NANPA effectively assisted me with the application process.

State Commission Responses:

One of the 14 commissions responded to this question with an average rating of 3.0.

Industry Participant Responses:

For Code 52 of the 71 respondents answered this question with an average rating of 4.2 Forty-five of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.9; 900 – 4.0; 500 – 4.2; 555 – 4.7; and Other – 4.0.

5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).

State Commission Responses:

One of the 14 commissions responded to this question with an average rating of 3.0.

Industry Participant Responses:

For Code 56 of the 71 respondents answered this question with an average rating of 3.9 Fifty-two of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.9; 900 – 4.0; 500 – 3.7; 555 – 4.0; and Other – 3.4.

6. NANPA provided a helpful referral when appropriate.

State Commission Responses:

Of the 14 commissions, four responded to this question with an average rating of 3.3. One commission responded with a 1 but provided no comments or explanation for the rating. Two commissions gave a rating of 5 to this question of timeliness.

Industry Participant Responses:

For Code 51 of the 71 respondents answered this question with an average rating of 4.1. Forty of the respondents gave ratings of 4 or 5. Additional resources mentioned in the responses received the following average ratings: CIC – 4.9; 900 – 4.5; 500 – 4.0; 555 – 4.5; and Other – 3.8.

7. NANPA responded in accordance with the applicable industry guidelines

State Commission Responses:

Four of the 14 commissions responded to this question with an average rating of 3.0. Again, the same commission who responded with low scores for questions 1, 2, 3, and 6 rated this question as a 1. Two commissions gave a rating of 4 or 5 to this question.

Industry Participant Responses:

Of the 71 respondents, for CO Code 56 responded to this question with an average rating of 4.0. Twenty-one respondents gave a rating of 4 and twenty-six gave a rating of 5 to this question. Additional resources mentioned in the responses received the following average ratings: CIC – 4.9; 900 – 4.0; 500 – 4.2; 555 – 4.7; and Other – 4.2.

Section A - Number Administration Survey Ratings Summary

State Commission Responses:

The commissions responding to this section averaged a rating of 3.4. There were five ratings of 1 and one rating of 2. It is difficult to surmise the cause for the low ratings since the respondent provided no explanation. Eleven ratings of 4 and nine ratings of 5 were given for the seven questions. The overall ratings for this section by commissions ranged from 1.0 to 5.0.

Industry Participant Responses:

The industry participants responding to this section averaged a rating of 4.1. There were four ratings of 1 and seventeen ratings

of 2. 158 ratings of 4 and 178 ratings of 5 were given for the seven questions. The overall ratings for this section by industry ranged from 1.0 to 5.0.

## Section B – NPA Relief Planning

This section contains individual survey responses by both NANPA NPA Relief Planning Region and generically where the respondent designated no specific NPA. Survey respondents provided multiple NPA responses on each survey therefore there are more responses acknowledged than there are identified respondents to this section of the survey.

1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.

### State Commission Responses:

Of the 14 commissions, 25 responses were submitted to this question with an average rating of 3.3. Six responses contained a one. Other comments described recent relief experiences and NANPA responses to commission information requests. Ratings of 4 or 5 were provided in 18 of the responses received.

### Industry Participant Responses:

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 4.1. There were no responses that contained a one. Ratings of 4 or 5 were provided in nine of the responses received. For the Eastern Region NPA Relief Planners there were 62 responses with an average rating of 4.1; the Central Region had 53 responses with a rating of 3.9 and the Western Region had 38 responses with a rating of 3.9.

2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.

### State Commission Responses:

Of the 14 commissions, there were 25 responses to this question with an average rating of 3.8. Nineteen responses from the commissions gave a rating of 4 or 5 to this question.

### Industry Participant Responses:

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 4.3. There were no responses that contained a one. Ratings of 4 or 5 were provided in nine of the responses received. For the Eastern Region NPA Relief Planners there were 62 responses with an average rating of 4.2; the Central Region had 45 responses with a rating of 4.0 and the Western Region had 38 responses with a rating of 4.1.

3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.

**State Commission Responses:**

Of the 14 commissions, there were 25 responses to this question with an average rating of 3.0. Ratings of 4 or 5 were given in 15 of the responses.

**Industry Participant Responses:**

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 3.9. There was one response that contained a one. Ratings of 4 or 5 were provided in nine of the responses received. For the Eastern Region NPA Relief Planners there were 61 responses with an average rating of 4.0; the Central Region had 56 responses with a rating of 3.8 and the Western Region had 38 responses with a rating of 3.9.

4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.

**State Commission Responses:**

Of the 14 commissions, there were 24 responses to this question with an average rating of 3.6. Fourteen responses from the commissions rated them as either a 4 or 5 for this question.

**Industry Participant Responses:**

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 4.0. There were no responses that contained a one. Ratings of 4 or 5 were provided in nine of the responses received. For the Eastern Region NPA Relief Planners there were 58 responses with an average rating of 4.1; the Central Region had 49 responses with a rating of 4.3 and the Western Region had 36 responses with a rating of 4.1.

5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.

**State Commission Responses:**

Of the 14 commissions, 22 responses to this question with an average rating of 3.7. 15 responses indicated a rating of either 4 or 5 to this question.

**Industry Participant Responses:**

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 3.9. There were

no responses that contained a one. Ratings of 4 or 5 were provided in eight of the responses received. For the Eastern Region NPA Relief Planners there were 58 responses with an average rating of 4.2; the Central Region had 39 responses with a rating of 4.1 and the Western Region had 38 responses with a rating of 4.3.

6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.

**State Commission Responses:**

Sixteen of the responses received from the 14 commissions responded to this question with an average rating of 3.7. There was one commission who responded with two 1's with no specific reason given. Ratings of 4 or 5 were given by four commissions.

**Industry Participant Responses:**

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 4.3. There were no responses that contained a one. Ratings of 4 or 5 were provided in eleven of the responses received. For the Eastern Region NPA Relief Planners there were 60 responses with an average rating of 4.1; the Central Region had 38 responses with a rating of 3.2 and the Western Region had 32 responses with a rating of 4.0.

7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.

**State Commission Responses:**

Fifteen of the responses received from the 14 commissions responded to this question with an average rating of 2.7. There were four ratings of 1 for this question with no specific reason given. Eight responses from the commissions rated them as a 4.

**Industry Participant Responses:**

Of the 71 industry respondents, 10 general responses were submitted to this question with an average rating of 3.9. There were no responses that contained a one. Ratings of 4 or 5 were provided in eight of the responses received. For the Eastern Region NPA Relief Planners there were 27 responses with an average rating of 3.9; the Central Region had 47 responses with a rating of 3.5 and the Western Region had 51 responses with a rating of 3.8.

8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.

**State Commission Responses:**

Fourteen of the responses received from the 14 commissions responded to this question with an average rating of 3.8. Five responses gave a rating of 4 and three responses gave a rating of 5 to this question.

**Industry Participant Responses:**

Of the 71 industry respondents, 11 general responses were submitted to this question with an average rating of 4.0. There was one response that contained a one. Ratings of 4 or 5 were provided in ten of the responses received. For the Eastern Region NPA Relief Planners there were 37 responses with an average rating of 3.9; the Central Region had 38 responses with a rating of 3.8 and the Western Region had 58 responses with a rating of 4.0.

**Section B – NPA Relief Planning Ratings Summary**

**State Commission Responses:**

The commission's responses to this section averaged a rating of 3.5. There were 22 responses with a rating of 1. No problems or issues were identified with these responses to indicate why there was dissatisfaction with NANPA's performance. Thirty-six responses out of the total 166 responses received had ratings of 5 for the eight questions. The overall ratings for this section by commission ranged from 2.7 to 3.8 with seven of them above 3.

**Industry Participant Responses:**

The industry's general responses to this section averaged a rating of 4.0. There were two responses with a rating of 1. Thirty-six responses out of the total 87 responses received had ratings of 5 for the eight questions. The overall ratings for this section by industry ranged from 3.2 to 4.3 with 1161 a 3 or above.

**Section C – Overall Assessment of NANPA**

1. Overall, I was satisfied with my interaction with the NANPA.

**State Commission Responses:**

Twelve of the 14 commissions responded to this question with an average rating of 3.9. There was one commission who responded with a 1. No reasons were included in the comments. Ratings of 4 or 5 were given by ten commissions.

Industry Participant Responses:

Sixty of the 71 respondents answered this question with an average rating of 4.2. There were 52 responses with a 4 or 5 rating.

2. The NANPA web site is a) accessible, b) easy to navigate, and c) informative.

State Commission Responses:

An average rating of 3.9 was given by 11 of the 14 commissions for the three parts of this question. There was one rating of 1 for the accessible section of this question. The individual averages per question are as follows: a) 4.0; b) 3.8 and c) 3.9. The informative response received a rating of 4 from eight of the commissions, and the accessible response receiving a rating of 5 from four of the commissions.

Industry Participant Responses:

An average rating of 4.2 was given for the three parts of this question. The individual averages per question are as follows: a) 4.2; b) 4.1 and c) 4.2.

3. Overall, the NANPA representative(s) was (were) courteous and professional

State Commission Responses:

Of the 14 commissions, 12 responded to this question with an average rating of 4.7. No commission responded with a rating of less than 4 and eight commissions responded with a 5 to this question.

Industry Participant Responses:

Of the 71 industry respondents, 63 responded to this question with an average rating of 4.6. There were no responses with a rating of 1. Sixty-two of the respondents replied with a rating of 4 or 5.

Section C – Overall Assessment Ratings Summary

State Commission Responses:

The commissions responding to this section averaged a rating of 4.1. There were two ratings of 1 identified and were associated with accessibility and NANPA interaction. The overall ratings for this section by commission ranged from 3.8 to 4.7.

Industry Participant Responses:

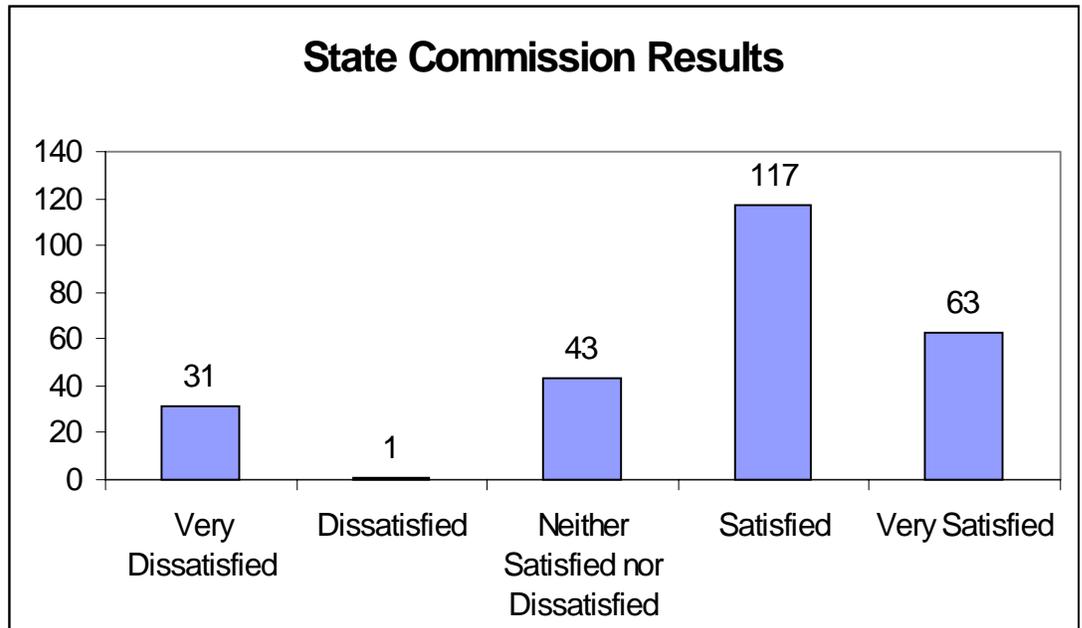
The industry participants responding to this section averaged a rating of 4.3. There was one rating of 1 identified. The overall ratings for this section by commission ranged from 4.1 to 4.6.

Cumulative Results

State Commission Responses:

If scores for all three sections are averaged together, a total average of **3.6** is derived.

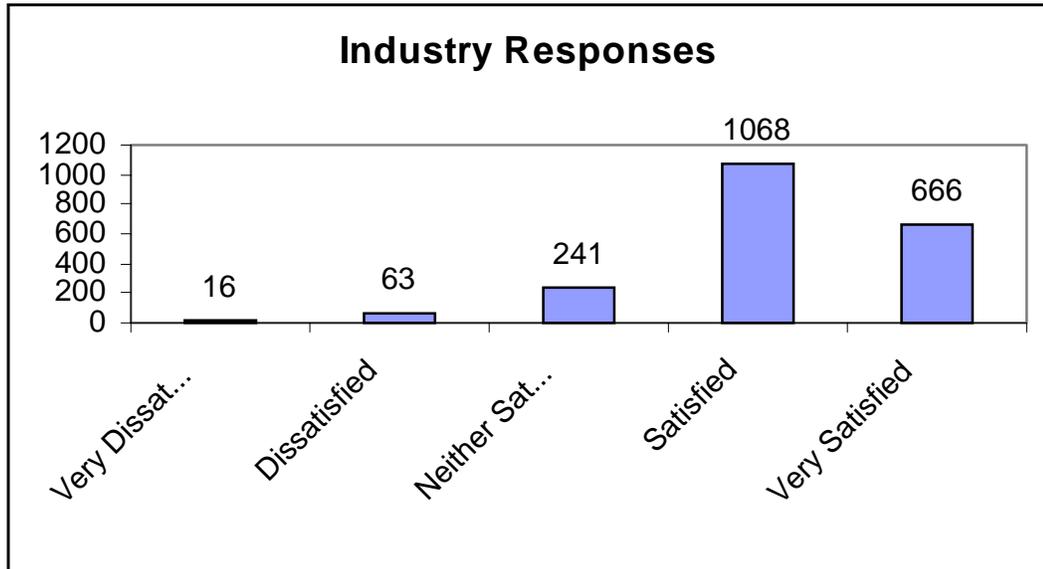
The individual raw scores of all questions are as follows:



The remaining scores were "Neutral," "NA," or "No Score." The individual commission scores for all sections ranged from 1.0 to 5.0.

Industry Participant Responses:

A total average of 4.2 is derived from all the industry participant section scores. The individual raw scores of all questions are as follows:



The remaining scores were "Neutral," "NA," or "No Score." The individual respondent scores for all sections ranged from 1.0 to 5.0.

Tables

Tables 2 and 3 are summaries of all numerical survey responses for sections A, B, and C for both the state commissions and the industry respondents.

Table 2: Survey Responses by State Commissions

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	29.0	8	<b>3.6</b>	1	1	1	2	3
2. NANPA demonstrated appropriate knowledge of the numbering resource.	33.0	9	<b>3.7</b>	1	0	1	5	2
3. NANPA was familiar with the processes required to fulfill my request.	16.0	5	<b>3.2</b>	1	0	1	2	1
4. NANPA effectively assisted me with the application process.	3.0	1	<b>3.0</b>	0	0	1	0	0
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	4.0	1	<b>4.0</b>	0	0	0	1	0
6. NANPA provided a helpful referral when appropriate.	13.0	4	<b>3.3</b>	1	0	1	0	2
7. NANPA responded in accordance with the applicable industry guidelines.	12.0	4	<b>3.0</b>	1	0	1	1	1
<b>Total</b>			110.0	<b>5</b>	<b>1</b>	<b>6</b>	<b>11</b>	<b>9</b>
<b>Count</b>			32					
<b>Statistical Average</b>			<b>3.4</b>					

Table 2: Survey Responses by State Commissions

<b>Section B - NPA Relief Planning</b>								
	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.	82.0	25	<b>3.3</b>	6	0	1	11	7
2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.	95.0	25	<b>3.8</b>	2	0	4	12	7
3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.	76.0	25	<b>3.0</b>	6	0	4	11	4
4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.	86.0	24	<b>3.6</b>	2	0	8	8	6
5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.	81.0	22	<b>3.7</b>	2	0	5	9	6
6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.	59.0	16	<b>3.7</b>	2	0	0	11	3
7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.	41.0	15	<b>2.7</b>	4	0	3	8	0
8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.	53.0	14	<b>3.8</b>	0	0	6	5	3
<b>Total</b>			<b>573.0</b>	<b>24</b>	<b>0</b>	<b>31</b>	<b>28</b>	<b>12</b>
<b>Count</b>			<b>166.0</b>					
<b>Statistical Average</b>			<b>3.5</b>					

Table 2: Survey Responses by State Commissions

<b>Section C - Overall Assessment of NANPA</b>								
	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. Overall, I was satisfied with my interaction with NANPA.	41.0	12	<b>3.4</b>	2	1	0	4	3
3. Overall, I found the NANPA web site to be:	41.0	10	<b>4.1</b>	0	0	0	5	3
a)accessible								
b)easy to navigate								
c)informative								
3. Overall, the NANPA representative(s) was (were) courteous and professional.	45.0	11	<b>4.1</b>	0	2	0	2	6
<b>Total</b>			11.6	2	3	0	11	12
<b>Count</b>			3					
<b>Statistical Average</b>			<b>3.9</b>					
<b>Sum of Averages</b>			11.0	8	13	0	49	37
<b>Number of Categories Evaluated</b>			3.0					
<b>Average of Averages</b>			<b>3.7</b>					

Table 3: Survey Responses by Industry Participants

CO Code Responses

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	246.0	59	<b>4.2</b>	1	2	6	27	23
2. NANPA demonstrated appropriate knowledge of the numbering resource.	245.0	57	<b>4.3</b>	0	3	3	25	26
3. NANPA was familiar with the processes required to fulfill my request.	243.0	57	<b>4.3</b>	1	2	3	26	25
4. NANPA effectively assisted me with the application process.	216.0	52	<b>4.2</b>	0	4	3	18	27
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	249.0	56	<b>4.4</b>	0	0	4	23	29
6. NANPA provided a helpful referral when appropriate.	209.0	51	<b>3.1</b>	1	1	9	18	22
7. NANPA responded in accordance with the applicable industry guidelines.	223.0	56	<b>4.0</b>	1	5	3	21	26
<b>Total</b>			1631	<b>4</b>	<b>17</b>	<b>31</b>	<b>158</b>	<b>178</b>
<b>Count</b>			388					
<b>Statistical Average</b>			<b>4.2</b>					

Table 3: Survey Responses by Industry Participants

CIC Responses

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	39.0	8	<b>4.9</b>	0	0	0	1	7
2. NANPA demonstrated appropriate knowledge of the numbering resource.	38.0	8	<b>4.8</b>	0	0	1	0	7
3. NANPA was familiar with the processes required to fulfill my request.	42.0	9	<b>4.7</b>	0	0	0	3	6
4. NANPA effectively assisted me with the application process.	39.0	8	<b>4.9</b>	0	0	0	1	7
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	39.0	8	<b>4.9</b>	0	0	0	1	7
6. NANPA provided a helpful referral when appropriate.	34.0	7	<b>4.9</b>	0	0	0	1	6
7. NANPA responded in accordance with the applicable industry guidelines.	39.0	8	<b>4.9</b>	0	0	0	1	7
<b>Total</b>			270	<b>0</b>	<b>0</b>	<b>1</b>	<b>8</b>	<b>47</b>
<b>Count</b>			56					
<b>Statistical Average</b>			<b>4.8</b>					

Table 3: Survey Responses by Industry Participants

900 Responses

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	5.0	1	<b>5.0</b>	0	0	0	0	1
2. NANPA demonstrated appropriate knowledge of the numbering resource.	3.0	1	<b>3.0</b>	0	0	1	0	0
3. NANPA was familiar with the processes required to fulfill my request.	4.0	1	<b>4.0</b>	0	0	0	1	0
4. NANPA effectively assisted me with the application process.	4.0	1	<b>4.0</b>	0	0	0	1	0
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	4.0	1	<b>4.0</b>	0	0	0	1	0
6. NANPA provided a helpful referral when appropriate.	9.0	2	<b>4.5</b>	0	0	0	1	1
7. NANPA responded in accordance with the applicable industry guidelines.	4.0	1	<b>4.0</b>	0	0	0	1	0
<b>Total</b>			33	<b>0</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>2</b>
<b>Count</b>			8					
<b>Statistical Average</b>			<b>4.1</b>					

Table 3: Survey Responses by Industry Participants

500 Responses

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	21.0	5	<b>4.2</b>	0	0	1	2	2
2. NANPA demonstrated appropriate knowledge of the numbering resource.	21.0	5	<b>4.2</b>	0	0	1	2	2
3. NANPA was familiar with the processes required to fulfill my request.	23.0	5	<b>4.6</b>	0	0	0	2	3
4. NANPA effectively assisted me with the application process.	21.0	5	<b>4.2</b>	0	0	1	2	2
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	11.0	3	<b>3.7</b>	0	0	1	2	2
6. NANPA provided a helpful referral when appropriate.	16.0	4	<b>4.0</b>	0	0	1	2	2
7. NANPA responded in accordance with the applicable industry guidelines.	21.0	5	<b>4.2</b>	0	0	1	2	2
<b>Total</b>			134	<b>0</b>	<b>0</b>	<b>6</b>	<b>14</b>	<b>14</b>
<b>Count</b>			332					
<b>Statistical Average</b>			<b>4.2</b>					

Table 3: Survey Responses by Industry Participants

555 Responses

<b>Section A – Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	10.0	2	<b>5.0</b>	0	0	0	0	2
2. NANPA demonstrated appropriate knowledge of the numbering resource.	12.0	3	<b>4.0</b>	0	0	1	1	1
3. NANPA was familiar with the processes required to fulfill my request.	14.0	3	<b>4.7</b>	0	0	0	1	2
4. NANPA effectively assisted me with the application process.	14.0	3	<b>4.7</b>	0	0	0	1	2
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	4.0	1	<b>4.7</b>	0	0	0	1	2
6. NANPA provided a helpful referral when appropriate.	9.0	2	<b>4.5</b>	0	0	0	1	1
7. NANPA responded in accordance with the applicable industry guidelines.	14.0	3	<b>4.7</b>	0	0	0	1	2
<b>Total</b>			77	<b>0</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>12</b>
<b>Count</b>			17					
<b>Statistical Average</b>			<b>4.5</b>					

Table 3: Survey Responses by Industry Participants

Other Responses

<b>Section A –</b>								
<b>Number Administration</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA responded to my inquiry within the same day or at most by the next business day.	23.0	7	<b>3.3</b>	2	0	1	2	2
2. NANPA demonstrated appropriate knowledge of the numbering resource.	18.0	5	<b>3.6</b>	0	0	2	3	0
3. NANPA was familiar with the processes required to fulfill my request.	27.0	6	<b>4.5</b>	0	0	0	3	3
4. NANPA effectively assisted me with the application process.	24.0	6	<b>4.0</b>	0	0	3	0	3
5. NANPA processed the request in a timely manner, consistent with the applicable guidelines (i.e., 10 business days).	17.0	5	<b>3.4</b>	0	2	1	0	2
6. NANPA provided a helpful referral when appropriate.	19.0	5	<b>3.8</b>	0	0	2	2	1
7. NANPA responded in accordance with the applicable industry guidelines.	21.0	5	<b>4.2</b>	0	0	1	2	2
<b>Total</b>			149	<b>2</b>	<b>2</b>	<b>10</b>	<b>12</b>	<b>13</b>
<b>Count</b>			39					
<b>Statistical Average</b>			<b>3.8</b>					
<b>Sum of Section A Averages</b>			25.6.	<b>5</b>	<b>19</b>	<b>50</b>	<b>203</b>	<b>266</b>
<b>Number of Categories Evaluated</b>			6.0					
<b>Average of Averages</b>			<b>4.3</b>					

Table 3: Survey Responses by Industry Participants

**Section B – NPA Relief Planning: General Comments, no specific NPA identified.**

<b>Section B - NPA Relief Planning</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.	45.0	11	<b>4.1</b>	0	2	0	4	5
2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.	47.0	11	<b>4.3</b>	0	1	1	3	6
3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.	43.0	11	<b>3.9</b>	1	0	1	5	4
4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.	44.0	11	<b>4.0</b>	0	2	0	5	4
5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.	43.0	11	<b>4.0</b>	0	3	0	5	4
6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.	47.0	11	<b>4.3</b>	0	0	0	8	3
7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.	39.0	10	<b>3.9</b>	0	2	0	5	3
8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.	44.0	11	<b>4.0</b>	1	0	0	6	4
<b>Total</b>			<b>352.0</b>	<b>2</b>	<b>10</b>	<b>2</b>	<b>41</b>	<b>33</b>
<b>Count</b>			<b>87.0</b>					
<b>Statistical Average</b>			<b>4.0</b>					

The following tables also depict specific NPA results reflected by NANPA-identified regions. These regional groupings help NANPA to evaluate internal differences in performance.

Table 3: Survey Responses by Industry Participants

**Section B – Eastern Region NPA Relief Planning compiled from survey responses that identified specific NPAs**

<b>Section B – Eastern Region NPA Relief Planning</b>	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.	254.0	62	<b>4.1</b>	2	0	4	38	18
2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.	260.0	62	<b>4.2</b>	0	2	5	34	21
3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.	243.0	61	<b>4.0</b>	0	3	5	43	10
4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.	235.0	58	<b>4.1</b>	0	3	6	34	15
5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.	244.0	58	<b>4.2</b>	0	1	2	39	16
6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.	247.0	60	<b>4.1</b>	0	0	2	23	7
7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.	104.0	27	<b>3.9</b>	0	0	12	7	8
8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.	143.0	37	<b>3.9</b>	0	3	4	25	5
<b>Total</b>			<b>1137.0</b>	<b>2</b>	<b>12</b>	<b>40</b>	<b>243</b>	<b>100</b>
<b>Count</b>			<b>284.0</b>					
<b>Statistical Average</b>			<b>4.0</b>					

Table 3: Survey Responses by Industry Participants

**Section B – Central Region NPA Relief Planning compiled from survey responses identified NPAs**

<b>Section B – Central NPA Relief Planning Region</b>								
	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.	209.0	53	<b>3.9</b>	0	1	8	37	7
2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.	180.0	45	<b>4.0</b>	0	0	10	25	10
3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.	210.0	56	<b>3.8</b>	0	1	19	29	7
4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.	211.0	49	<b>4.3</b>	0	1	1	29	18
5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.	160.0	39	<b>4.1</b>	0	0	7	21	11
6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.	122.0	38	<b>3.2</b>	5	1	3	25	4
7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.	166.0	47	<b>3.5</b>	0	4	21	15	7
8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.	145.0	38	<b>3.8</b>	0	2	7	25	4
<b>Total</b>			<b>1403.0</b>	<b>5</b>	<b>10</b>	<b>76</b>	<b>206</b>	<b>68</b>
<b>Count</b>			<b>365.0</b>					
<b>Statistical Average</b>			<b>3.8</b>					

Table 3: Survey Responses by Industry Participants

**Section B – Western Region NPA Relief Planning compiled from survey responses identified NPAs**

<b>Section B – Western NPA Relief Planning Region</b>								
	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. NANPA determined the need for NPA relief in accordance with industry guidelines and regulatory requirements.	149.0	38	<b>3.9</b>	0	0	13	15	10
2. NANPA promptly communicated the need for NPA relief in accordance with industry guidelines or regulatory requirements.	156.0	38	<b>4.1</b>	0	0	2	30	6
3. NANPA displayed detailed knowledge of the NPA, identified possible relief plans, drafted the initial planning document, and provided exhaust forecasts.	148.5	38	<b>3.9</b>	0	2	9	18	9
4. NANPA provided information to the industry sufficiently in advance of the planning meeting to allow time for analysis.	146.0	36	<b>4.1</b>	0	0	4	26	6
5. NANPA conducted NPA relief planning meetings and discussion of the alternatives in a fair and impartial manner.	164.0	38	<b>4.3</b>	0	0	5	16	17
6. NANPA provided the industry recommended relief plan in a timely manner to the state regulatory body and provided testimony when necessary.	127.0	32	<b>4.0</b>	0	0	2	43	15
7. NANPA prepared and issued a press release and planning letter to inform the public and the industry of the approved relief plan and implementation dates.	196.0	51	<b>3.8</b>	0	2	15	23	11
8. NANPA determined when it was appropriate to declare jeopardy, notified affected parties, conducted Jeopardy meetings and implemented the plan.	234.0	58	<b>4.0</b>	1	0	5	41	11
<b>Total</b>			<b>1913.0</b>	<b>1</b>	<b>4</b>	<b>55</b>	<b>212</b>	<b>85</b>
<b>Count</b>			<b>470.0</b>					
<b>Statistical Average</b>			<b>4.1</b>					
<b>Sum of Section B Averages</b>			15.9	<b>10</b>	<b>36</b>	<b>173</b>	<b>712</b>	<b>286</b>
<b>Number of Categories Evaluated</b>			4.0					
<b>Average of Averages</b>			<b>4.0</b>					

Table 3: Survey Responses by Industry Participants

<b>Section C - Overall Assessment of NANPA</b>								
	<b>Totals</b>	<b>Count</b>	<b>Average</b>	<b># 1's</b>	<b># 2's</b>	<b># 3's</b>	<b># 4's</b>	<b># 5's</b>
1. Overall, I was satisfied with my interaction with NANPA.	253.0	60	<b>4.2</b>	0	2	6	29	23
2. Overall, I found the NANPA web site to be:								
a) accessible	266.0	63	<b>4.2</b>	0	2	3	37	21
b) easy to navigate	220.0	54	<b>4.1</b>	1	3	2	32	16
c) informative	266.0	64	<b>4.2</b>	0	0	7	40	17
3. Overall, the NANPA representative(s) was (were) courteous and professional.	287.0	63	<b>4.6</b>	0	1	0	25	37
<b>Total</b>			1292	<b>1</b>	<b>8</b>	<b>18</b>	<b>163</b>	<b>114</b>
<b>Count</b>			304					
<b>Statistical Average</b>			<b>4.3</b>					
<b>Sum of Averages</b>			45.8	<b>16</b>	<b>63</b>	<b>241</b>	<b>1068</b>	<b>666</b>
<b>Number of Categories Evaluated</b>			11.0					
<b>Average of Averages</b>			<b>4.2</b>					

## Section 9 Qualitative Analysis

Criteria for assessment of comments:

In order to assess comments received via the Performance Feedback Survey, the following criteria was used:

- Because comments were voluntary, their submission was considered to be very meaningful. It was mandatory for respondents' to provide their names.
- Singular comments (received from only one respondent) relating to a particular area were considered to be unique, while comments received from multiple respondents were considered to constitute a trend.
- Comments were examined to determine relevance to requirements and only those that were relevant were assessed.

- Where possible, comments were categorized and assessed by both survey category and performance issue.
- The quantitative survey results were used to test the reasonableness of the qualitative survey results when possible.
- NANPA should be given the “benefit of the doubt” where requirements are subject to varying interpretations.

## Survey Comment Summaries

### Observations

The comments submitted by service providers and state regulators were both positive and negative in each of the major functional areas of NANPA. The comments were examined by the NOWG and summarized in one of the following functional areas: Number Administration (other than CO Code), CO Code Administration, NPA Relief Planning, Web Site, Internal Coordination, and Other. Comments were further sorted within the functional areas based on trends identified by the NOWG: Communications / Responsiveness, Guidelines / Requirements, Staffing and Technical / Analysis.

If directly quoted from verbatim comments, it will be so indicated.

Every attempt was made to maintain the focus and intent of the comments received from each respondent.

### 1. Number Administration

There were few comments on number administration (CIC, 500, 555, 900) other than CO Code.

#### Communications / Responsiveness

##### Individual Negative Comments

It appears that the NANPA transitioned to a new number administration / assignment system in 1999 and didn't notify the industry so they could be on the lookout for any problems that may have occurred.

#### Guidelines / Requirements

##### Multiple Positive Comments

Followed guidelines and responded to industry needs in a timely fashion.

#### Staffing

##### Multiple Positive Comments

The entire NANPA team was identified by multiple service provider and state commissions as being very knowledgeable, responsive and professional.

## Technical / Analysis

### Individual Negative Comments

A respondent commented that in the transition to a new number administration / assignment system, their data was corrupted.

## 2. CO Code Administration

Many comments were received from service providers and state commissions.

### Communications / Responsiveness

#### Multiple Positive Comments

CO Code Administrators have been knowledgeable, responsive and timely in their work.

#### Multiple Negative Comments

Incidents of code administrators mishandling information and failing to notify service providers of administrative changes.

### Guidelines / Requirements

#### Individual Positive Comments

A code administrator was knowledgeable of guidelines and followed them.

A code administrator improved timeliness.

#### Multiple Negative Comments

Numerous comments were received regarding the inconsistent and incorrect interpretations of industry guidelines by NANPA personnel.

NANPA failed to respond in a timeframe that is specified in industry guidelines. In some instances NANPA's lack of consideration of the difference in time zones resulted failure to meet deadlines.

Instances were identified in which it appeared the administrator failed to know code assignment requirements of a given local area.

### Staffing

#### Multiple Positive Comments

Code Administrators (referred to in general and also by name) were identified as helpful, knowledgeable, conscientious, courteous, professional, and supportive. If they didn't know the answer to a question, they properly referred respondents to the correct place or person. Overall many respondents indicated they were very satisfied with their CO Code Administrators and indicated that the administrators "strive to provide great service".

Individual Negative Comments

A respondent feels that NANPA "has not been or acted as a neutral body".

Multiple Negative Comments

Numerous comments were received stating that administrators were not responsive, did not resolve issues in a timely manner, and that they lacked consistency.

**Technical / Analysis**

Multiple Negative Comments

Concern over clarity and precision of information was expressed.

**3. NPA Relief Planning**

**Communications / Responsiveness**

Multiple Positive Comments

Respondents stated that planners listened and satisfactorily performed their functions; and indicated improvement over last year.

Multiple Negative Comments

Meeting skills and document distribution needs to improve.

**Guidelines / Requirements**

Multiple Positive Comments

Respondents indicated improvement over last year.

Multiple Negative Comments

Information was not provided in a timely manner. Respondents indicated a need to improve the depth and quality of the IPD and facilitation skills. Declared jeopardies some respondents felt unnecessary or based on assumptions the respondents disagreed with because of specific local conditions.

**Web Site**

Individual Positive Comment

Usefulness of site is improved.

Individual Negative Comment

Continued improvement is needed.

**Staffing**

Multiple Positive Comments

Several respondents indicated that the staff is responsive and knowledgeable, and does a quality job preparing for and running planning meetings.

Multiple Negative Comments

It was noted that planners are not well informed of local circumstances that impact NPA relief. It was noted that planners are not always effective in the running of planning meetings.

**Technical / Analysis**

Individual Positive Comments

“Overall we see a definite improvement in relief planning over last year.”

Multiple Negative Comments

Planners sometimes used erroneous information, inconsistent methods and questionable data. Variations in tools and methods between planners/regions resulted in incorrect NPA calculations. Information and outputs provided were erroneous.

**4. Overall Web Site**

**Communications / Responsiveness**

Individual Positive Comments

Both the Document Distribution Service and the web site are valuable tools.

Individual Negative Comments

Information and cross-references need to be better maintained.

**Web Site**

Multiple Positive Comments

Good tool for posting newly developed reports. “The web site, overall, has been dramatically improved from the previous year.”

Multiple Negative Comments

The web site should be more frequently updated. It is sometimes difficult to access the web site.

**5. Overall**

**Communications / Responsiveness**

Multiple Positive Comments

Communications with the states have improved and have been appreciated.

Multiple Negative Comments

In accordance with 47 C.F.R. Sec. 52.13(b), NANPA is obligated to function in an “efficient, effective, fair, unbiased, and non-discriminatory manner”. Commenters believe NANPA failed to protect those obligations in several activities during the course of 1999. Commenters also related their concern with confusion

over NANPA vs. NeuStar and their respective obligations. Neither NANPA nor NeuStar should not represent that they understand the scope of how service providers'

### **Guidelines / Requirements**

#### Multiple Negative Comments

Commenters were uncertain whether they could rely on information and commitments made by NANPA. Commenters did not feel their needs were being met partly due to the effects of time zone differences.

### **Web Site**

#### Individual Positive Comments

The web site is very accessible and very user friendly.

### **Staffing**

#### Multiple Positive Comments

The general impression of the NANPA staff is that they are courteous, professional, responsive, and knowledgeable. Commenters also noted that the centralization of NANPA functions is an improvement.

#### Individual Negative Comments

A commenter indicated that it is difficult to maintain continuity with frequent NANPA staff changes.

#### Multiple Negative Comments

Commenters did not have a clear understanding as to the role of NANPA vs. NeuStar personnel, who they represent and what their obligations are.

## **Section 10 Findings and Conclusions**

NANPA's overall rating for performing number administration was deemed "above average"<sup>3</sup>.

Survey comments indicate that NANPA is knowledgeable, professional and courteous in performance of their duties. The internal measures of performance developed by NANPA clearly indicated continued improvement during 1999.

### **NANPA Operational Performance**

#### **Annual Report**

The Report had a very professional appearance, which was a dramatic improvement over the 1998 Report.

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<sup>3</sup> For 1999 the NOWG established a performance scale that reflects two extremes which are "unsatisfactory" and "exceptional". On this scale an "average" rating would fall midway between the extremes.

There are three areas of primary concern. The Annual Report is intended to be a snapshot of the numbering resources administered by the NANPA. Although the NOWG found much of the content interesting and useful, the focus of the Report was missed. This same finding was also pointed out in the 1998 performance review.

Specifically, Section 9.6.2 of the NANPA Requirements Document clearly states the elements to be included, at a minimum, in the Annual Report. The Report contained only two of the nine required elements. NOWG acknowledges that the remaining seven elements have been made available elsewhere, e.g., the web site. However, the objective of this requirement is to provide the industry with a mechanism for annual comparisons on the status of numbering resources by using one comprehensive document.

Second, NANPA appeared to be inconsistent in its references to itself versus NeuStar. Sensitivity to this issue was heightened in 1999 due to some information in the Report and other activities that took place.

Finally, the number of code applications processed as stated in the Report is not indicative of the actual number of new code requests from the industry.

### Communications / Responsiveness

Most functions of the NANPA have shown improvement in the areas of communications and responsiveness. State commissions identified a significant improvement over last year. Number Administrators were viewed as knowledgeable, responsive and timely in their work. NPA Relief Planners received an overall satisfactory rating in these areas. Comments received indicated that NANPA's new Document Distribution System significantly contributed to the improvement in communication.

Further improvements are needed in keeping records up to date, facilitating NPA relief planning meetings, and distributing notifications and meeting records in a more timely manner. It was also reported that CO Code Administrators occasionally mishandled information or failed to notify service providers of administrative changes. These occurrences need to be eliminated.

During the evaluation process it became apparent to the NOWG that the industry was confused about the respective roles and responsibilities of NANPA versus NeuStar employees.

NANPA frequently communicated with individual service providers and regulators. While this communication is warranted and helpful, NOWG's expectation is that NANPA will make information available about contacts with any regulator and also make information available if they (NANPA) initiate the contact with a service provider.

### Guidelines / Requirements

NANPA showed improvement over last year in their diligence to follow industry guidelines. However, adherence to guidelines is a fundamental requirement. Inconsistency in interpreting the guidelines was a significant concern expressed in some survey comments. In addition, multiple comments identified incidents of inadequate timeliness. Some were based on NANPA's failure to adequately consider time zones. It is a requirement that NANPA be available to meet all NANP participants' needs.

## Web Site

Overall, comments indicated that NANPA's web site provided necessary and valuable information. NANPA was very responsive to last year's concerns and also to additional input during 1999. Continued improvement could be achieved by more frequent and timely updates.

## Staffing

The general observation was that NANPA employees were knowledgeable, professional, courteous and responsive. Certain NANPA staff members performed so well that respondents to the survey elected to mention them by name. Statements indicated that these individuals went over and above expectations and provided high quality customer service.

NANPA adjusted staffing levels during 1999 to meet the needs of the industry. Comments indicated that further development and training would be beneficial for some staff in performing their duties.

## Technical / Analysis

Technical / Analysis relates to the underlying capabilities which NANPA is expected to possess. This category deals with the level of expertise of NANPA staff as well as the overall capability of the systems and tools that NANPA uses.

Survey comments indicated specific areas needing improvement. Adequate local area knowledge (e.g., code conflicts, dialing plans, exhaust factors) was lacking. Variations in the applications of tools and methods used by relief planners produced inconsistent results. In addition, concerns were expressed that NANPA declared jeopardy in some NPAs either too early or too late to meet the needs of the affected parties.

## NANPA Tactical Performance

During the operational review the NOWG learned of the extent of NANPA's work effort for regulators that was outside of required duties. This indicated a willingness and ability to meet unexpected demands NANPA considered important.

Lockheed Martin's bid response to the original Requirements Document indicated that they would implement a new state-of-the-art number management system. Expectations were that this system would be operational early in the contract cycle. This had not been done as of the 1998 performance review and was part of the PIP. NOWG was surprised when they learned during the 1999 operational review that the new Code Administration System was near completion. NOWG was concerned that there had been no industry involvement in the development and design of a complex system meant to serve the industry.

The NANPA is required by statute and Commission regulation to be "independent" and "impartial" in its role as manager of the NANP. [47 U.S.C. § 251(e)(1); 47 C.F.R. §§ 52.12(a)(1), 52.13(a)] As the neutral third-party number administrator, the NANPA is obligated to act in an "efficient, effective, fair, unbiased, and non-discriminatory manner" and to "support the industry's efforts to accommodate current and future numbering needs." [47 C.F.R. § 52.12(b)]

The following NOWG perceptions were identified during this evaluation process. These are based on survey verbatims, the operational review, and interactions and observations with the NANPA throughout the year. These perceptions result in various implications:

- industry confusion over whether an employee can represent both NANPA and NeuStar without compromising the requirement to be a neutral third party administrator;
- the potential leveraging of the NANPA position in the industry to the advantage of the for-profit NeuStar corporation; and
- the dilemma faced by NANPA staff over commitment to the industry or to their employer.

## Section 11 Recommendations

This section contains recommendations to the NANPA that require corrective action as a result of the performance evaluation. These are the most significant areas where NANPA's performance should be improved.

### 1) Annual Report

- Next year's Report must include, at a minimum, all elements identified in Section 9.6.2 of the Requirements Document.
- With regard to NeuStar, the Report should address only NANPA, its functions, and its staff.

### 2) Communications/Responsiveness

- Changes to internal measurements should be made to drive improvement in record keeping, meeting facilitation, and timeliness in the distribution of notifications and meeting records.

### 3) Guidelines/Requirements

- The NANPA shall be available a minimum of five days a week, eight hours a day. However, since the NANP serving area covers several time zones, the NANPA must provide a mechanism (e.g., voicemail, email, facsimile) to be accessible on a 24-hour basis in order to meet the needs of the clients. It is expected the NANPA will respond within one business day to general inquires or questions made outside the normal business hours. Therefore, NANPA must be able to accommodate service providers' needs based on the service providers' time zone.
- NANPA must ensure that all code administrators and relief planners apply the industry guidelines in the same manner and eliminate inconsistent interpretations. It is recognized that states, under delegated authority, are permitted to direct NANPA to operate in a manner that does not comport with industry guidelines.

- NANPA must be more proactive by initiating issues and contributions to the INC when they believe guideline changes are warranted.

4) Web Site

- The site should be updated on at least a weekly basis.
- Post ex parte's

5) Staffing

- Continue enhancing the training and development program for numbering administration, meeting facilitation skills, and customer service.

6) Technical/Analysis

- Within 45 days document and make available to the industry the tools and methods used by relief planners to calculate NPA exhaust and relief projections.
- If industry guidelines are inadequate or ambiguous, NANPA must be proactive in initiating contributions.

7) Overall

- NANPA must identify how they will address the concerns noted in the Tactical Performance findings.
- NANPA is expected to be responsive to the items cited in this section (Items 1-7). However, this does not preclude NANPA from addressing other items that were identified throughout this report.

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Centennial Communications	
Cincinnati Bell Telephone	
Citizens Telecommunications	
Cox Communications	
Curtis Telephone	
Global NAPS	
GST Telecom	

GTE  
GTE Network Services  
Home Telephone Company  
Iowa Wireless Services  
Level 3 Communications  
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One Point Communications  
Orlando Telephone Company  
PageMart Wireless  
Ponderosa Telephone  
Puerto Rico Telephone Company  
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Appendix F - Performance Feedback Survey Responses (Available upon request)

Appendix G - Comparison of Previous Survey Results to Current Year Results

Appendix H - NeuStar AOCN Audit

Appendix I - NANPA Operational Review Presentations

Appendix J - NANPA 1998 Performance Improvement Plan

Appendix K – NANPA NPA Relief Planning Regional Distribution

Appendix L - 1999 Performance Evaluation Team

**Appendix L**

1999 Performance Evaluation Team

The following NOWG members participated in the development of this report:

Caldwell, Pat	<i>Co-Chair</i>	BellSouth
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