

North American Numbering Council

**Number Administration
Auditor
Technical Requirements**

July 18, 2000

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Section 1.0 Introduction

1.1 Environment

The Auditor is a neutral, independent party that is not affiliated with any telecommunications entity and adheres to generally accepted auditing standards.

The Auditor will perform audits in a fair and non-discriminatory manner.

The Auditor must meet all neutrality requirements established by the FCC.

1.2 Designation

The use of the term Respondent in this document refers to the bidders responding to this RFP.

1.3 Scope

The Auditor is responsible for verifying compliance with industry guidelines for all numbering resources within the United States.

Appendix A contains a list of applicable industry guidelines that are in place today.

1.4 Definitions, Acronyms, and Abbreviations

COCAG INC CO Code Assignment Guidelines

INC The Industry Numbering Committee (INC) is an industry forum operating under the auspices of the Alliance for Telecommunications Industry Solutions (ATIS). Their mission is to provide an open forum to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of numbering resources and related dialing considerations for public telecommunications within the NANP area.

NANC The NANC is a Federal Advisory Committee established pursuant to the United States Federal Advisory Committee Act, 5 U.S.C., App. 2 (1988) (FACA). The NANC was established to advise the FCC and other NANP member countries on issues related to NANP administration, and to advise the Commission on local number portability administration issues in the United States. The NANC also develops policy recommendations on numbering

issues, initially resolves disputes, selects the administrator and provides guidance to the PA as well as the NANPA.

The NANC's Charter under the FACA provides that, in carrying out its responsibilities, the NANC shall assure that all NANP administrators support the following policy objectives:

1. that the NANP facilitates entry into the communications marketplace by making numbering resources available on an efficient, timely basis to communications service providers;
2. that the NANP does not unduly favor or disfavor any particular industry segment or group of consumers;
3. that the NANP does not unduly favor one technology over another;
4. that the NANP gives consumers easy access to the public switched telephone network; and
5. that the NANP ensures that the interests of all NANP member countries are addressed fairly and efficiently, fostering continued integration of the NANP across NANP member countries.

NANP North American Numbering Plan (NANP) is the basic numbering scheme for the public switched telecommunications networks in the following 19 countries (formerly known as World Zone 1): Anguilla, Antigua & Barbuda, Bahamas, Barbados, Bermuda, British Virgin Islands, Canada, Cayman Islands, Dominica, Dominican Republic, Grenada, Jamaica, Montserrat, St. Kitts & Nevis, St. Lucia, St. Vincent & the Grenadines, Trinidad & Tobago, Turks & Caicos Islands, and the United States. The format of the NANP is in compliance with International Telecommunications Union (ITU) standards as detailed in Recommendation E.164.

NANPA North American Number Plan Administrator

PA Thousand Block Number Pooling Administrator

Term of Administration Shall be for an initial period of time between official notification of award and designated date of contract termination. At any time prior to the termination of the initial or subsequent Term of Administration, the Term of Administration may be renewed up to five (5) years in length with the approval of the designated Auditor and the appropriate regulatory authorities.

Section 2.0 Responsibilities

The Auditor shall be responsible for performing audits of Service Providers, the NANPA, and the PA.

2.1 Focus

The Auditor will perform audits of data, records, reports, and if necessary, supporting operational processes for the numbering resources addressed in the guidelines listed in Appendix A.

2.2 Methodology

The Auditor will be responsible for conducting two types of audits: random and “For Cause”.

2.2.1 Random Audits are defined as:

- audits in which the service provider auditee and/or the test is randomly selected.
- audits of NANPA or the PA at random intervals and for randomly selected functional areas of their business.

2.2.2 “For Cause” Audits are defined as:

- audits conducted on a specific service provider to verify compliance with established industry guideline(s) for reasons based on substantive concerns or the need to verify data.

“For Cause” audits are limited to the circumstances related to the cause identified.

2.3 Application

2.3.1 Service Providers

The Auditor will audit service providers to:

1. verify compliance with industry guidelines.
2. verify that adequate and accurate records of public numbering resources are maintained.
3. determine that utilization reports are correct.

2.3.2 NANPA and the PA

The Auditor will audit the NANPA and the PA to:

1. ensure compliance with and non-discriminatory application of industry guidelines.
2. ensure protection of confidential information, and accuracy of record keeping.

2.4 Audit Reports

The Auditor will complete and distribute audit finding reports within specified timeframes that contain:

1. a summary of the Auditor's results including the specific requirement(s) upon which the audit is based.
2. the type of report issued on the auditee (i.e. unqualified opinion, qualified opinion, adverse opinion, or disclaimer of opinion).
3. information to provide a proper perspective for judging the prevalence and consequences of the audit findings, such as whether the audit findings represent an isolated instance or a systematic or systemic problem.
4. an identification of areas requiring corrective action.

2.4.1 Follow-up

The Auditor shall follow up, as necessary, on prior audit findings requiring a corrective action plan on the part of the auditee.

2.4.2 Record Retention

The Auditor will securely retain working papers and reports a minimum of three years after the date of the issuance of the Auditor's final report(s) to the auditee, unless the Auditor is notified by the FCC or its designate to extend the retention period.

Audit working papers will be made available to the FCC or its designate as is reasonable and necessary to resolve disputes of audit findings.

2.5 Disputes

The Auditor shall follow established procedures when disputes are encountered.

2.6 Industry Guidelines

It is the responsibility of the Auditor to report to the INC in writing of any guidelines which, in the Auditor's opinion, are ambiguous, require undue subjective judgment, or could lead to inconsistent Auditor evaluations.

2.7 Interfaces, Relationships and Interactions

2.7.1 Service Providers

The Auditor must establish relationships with Service Providers to ensure proper notification of audits (i.e. two to four weeks) and mutual agreement of time and place.

2.7.2 NANPA and/or PA

A portion of the information the Auditor will require to verify compliance with industry guidelines will be obtained from NANPA and/or the PA. Communications between the Auditor and NANPA or PA will need to be established to ensure that the Auditor has access to all relevant information needed during the course of a specific audit. These communications should be established such that they will not overly interfere with the duties and responsibilities of NANPA or PA.

Respondent shall indicate what type of interface with the NANPA and the PA is required in their audit program (e.g. e-mail, fax, EFT/FTP, direct system access, etc.).

2.7.3 FCC

The Auditor must establish a working relationship with the FCC or its designee.

2.7.4 Other Regulatory Agencies

The Auditor may also be required to communicate with other regulatory agencies as necessary to gather information in order to conduct an audit.

2.8 Confidentiality

The Auditor shall protect audit findings, working papers, data, and reports as confidential or proprietary whether collected from or provided by the service provider, the NANPA, the PA or regulators.

The Respondent shall describe their security measures in detail in their proposal

The Respondent shall also describe the ethical code of conduct under which they will operate.

2.9 Industry Knowledge

The Auditor must have a working knowledge of relevant telecommunications industry guidelines and associated industry and regulatory documentation.

Section 3.0 Concentration

The Auditor's function is to consistently employ the audit tests and procedures as identified within this requirements document and in industry guidelines. (See Appendix A for a list of industry guidelines)

The Respondent shall provide sufficient detail with regard to the audit requirements as outlined in this document to demonstrate understanding and to ensure compliance with those requirements.

3.1 Functional Requirements

The Auditor is responsible for performing the activities described below.

These activities have been grouped into discrete functional requirements.

Procure and maintain tools necessary to perform audits, evaluate data, report audit results and collect and store appropriate data and correspondence (e.g., corrective action progress reports).

Implement audit procedures in accordance with these requirements and corresponding industry guidelines. Industry guidelines identify the auditee (NANPA, PA and service providers) obligations, as well as the process/procedure for administering and managing the use of the respective numbering resource.

Evaluate audit results and identify if further action is required by the auditee. Please refer to the NANC Audit Framework for more details. (Appendix C)

3.2 Annual Audit Objective

The Respondent must clearly define how the annual audit objective will be established.

The FCC will annually review and approve these objectives before the Auditor commences that year's audits.

The objective must include selection of the specific criteria to be used from the industry guideline that is relevant to the numbering resource being audited.

3.3 Audit Sampling/Selection

It is necessary for the Auditor to use a uniform approach in selecting the sample sizes for similar audits. Likewise, a documented and consistent approach to selecting the Auditees must be prepared and included in the Respondent's proposal.

The sampling methodology will also need to be applied to the guideline tests used in audits of the NANPA and the PA.

The Respondent must describe in detail the appropriate application of statistical and non-statistical sampling methods to be used.

Specifically, the Respondent shall provide detail on:

- the techniques that will be employed to select the guideline test to become part of the audit,
- the determination of sample size , and
- the method of selecting Auditees to ensure that no industry segment or region is unduly burdened.

3.4 Audit Events and Tools

The Respondent shall provide in their proposal a description of a sufficient degree of automation to provide the Auditor with the capability to implement audits effectively and on a uniform basis.

The Respondent shall provide in their proposal a description of how documents would be tracked, an auditee notification process, and a methodology for creating reports.

In the course of conducting its duties and responsibilities, the Auditor must rely on specific guideline tests to determine the outcome of the audit.

3.5 Audit Program

The Respondent will provide details of its audit program that specifically addresses, at a minimum, the following information:

1. how the audit results will be used to effectively further identify or confirm common problem areas;
2. why the proposed audit program is ideal and warranted;
3. a description of any risk factors and their relationship to the audit findings; and
4. a defined approach to "benchmarking" as well as other techniques for measuring continuous improvement and the appropriateness of specific practices.

3.5.1 Audit Program - Random Audits

The audit program must include for the planning and initiation of random audits.

In planning each annual audit program and schedule of audits, the Auditor must identify the number of service providers and the number of guideline tests that will be included in the audit program; these factors should be used in determining the scope and associated cost of the audit program.

3.5.2 Audit Program - “For Cause” Audits

The audit program should include a summary of how to conduct “For Cause” audits.

When a “For Cause” audit is warranted, the Auditor will receive instructions from the FCC or its designee.

Possible triggers for initiating a for cause audit include:

- Random audit finding identifies an issue that triggers a “For Cause” audit;
- Auditee’s detailed corrective action plans. The Auditor randomly selects Auditees’ corrective action plans for audit.
- Percentage threshold of codes not reclaimed;
- Percentage deviation of code applications processed;
- Random audits uncover a systemic problem that could trigger an audit of a guideline process;
- Additional triggers identified by contribution and industry consensus.

3.6 Compliance Tests

The Auditor’s responsibility is to measure the auditee using compliance tests documented in current industry guidelines and the requirements described herein.

Appendix B is an example of these tests from the CO Code Administration Guidelines.

3.7 Testing of the Audit Program

The Auditor will perform an annual test of the audit program and process to be used.

The test will measure the effectiveness of the criteria and procedures to be applied when conducting an audit.

The Respondent shall include in its proposal a detailed example of the test for each audit type.

3.8 Audit Results

The Auditor is required to document the findings of any audit in an audit report.

3.8.1 Contents of the Audit Report

The following sections are minimum requirements for audit reports.

Respondents may propose additional sections with sufficient explanation of the need for the addition(s).

1. Executive Summary
2. Type of Audit (Random or For Cause):
 - Effective Date of Audit
 - Name of Auditor and Statement of Independence
3. Scope
 - Objective
 - Criteria / Audit Test
 - Applicability (specify guidelines used, GAAP)
4. Background
Information pertinent to understanding the subsequent details in the report such as including previous audit findings if available.
5. Findings
Audit findings will be presented in appropriate detail for the auditee. If it is necessary for the auditee to prepare a corrective action plan and take corrective action to resolve any identified discrepancies greater detail is necessary.
6. Auditor's Opinion.

Unqualified Opinion is used when the result of the audit uncovers no deficiencies or noncompliance.

Qualified Opinion is used when the result of the audit uncovers minor deficiencies and some noncompliance was identified, but is not considered systematic.

Adverse Opinion is used when the result of the audit uncovers major deficiencies and contains systematic noncompliance.

Disclaimer of Opinion is used when the Auditor was unable to review sufficient information from the auditee to form a clear opinion as to whether the auditee's records or supporting information contains any deficiencies or noncompliance.

For more detail, refer to the Audit Framework.

7. Auditee's Corrective Action Plan

Corrective actions to be taken to address non-compliance items as identified by the Auditor.

Corrective action means action taken by the auditee that:

1. corrects identified deficiencies
2. produces recommended improvements
3. demonstrates that audit findings are either invalid or do not warrant auditee action.

8. Clear statement of confidentiality on every page of the report.

3.8.2 Audit Report Timeline

No later than 14 calendar days following the completion of an audit, a draft audit report shall be submitted to the auditee.

Within 30 calendar days of receipt of this draft, the auditee shall prepare and submit to the Auditor its corrective action plan, if one is necessary.

The final audit report must be submitted **to the auditee** no later than 30 calendar days after receipt of the auditee's corrective action plan. Finally, the Auditor shall acknowledge receipt of the auditee's detailed corrective action plan within 24 hours.

3.8.3 Auditee's Corrective Action Plan

Once the corrective action plan has been executed, the auditee will submit a letter to the Auditor and to the FCC that the corrective action plan has been executed.

3.9 Information Exchange

When necessary, the Auditor may request in writing information from regulators, NANPA, the PA, the NANC, service providers, and/or the industry when preparing and/or evaluating audit results.

The Auditor will then be expected to evaluate and employ data, reports, statistics and other written information in their audit.

The Respondent shall provide in their proposal description of the method of gathering necessary data.

3.10 Use of NANPA or PA Data and Information

The Auditor may request and document the availability and use of various NANPA or PA work products, including, (1) the results of previous for cause audits, (2) COCUS, (3) NPA/NANP Exhaust Data, (4) Months-to-Exhaust Worksheets, and (5) resource applications and related parts/forms.

The requests should be made by letter or e-mail.

3.11 Use of Data Collected/Maintained from Other Sources

Reports, findings and evaluations may become known to the Auditor during the course of its service.

Concerns, claims and complaints may come in the form of voice mail, e-mail, written correspondence and even written evaluations from seemingly reputable sources. However reliable or authorized the source may appear when such information is presented, it is the duty and the responsibility of the Auditor to evaluate the merit and usefulness of the information based solely upon fact.

In all cases the Auditor may only use information that, in the Auditor's opinion, is based upon sound reasoning. Only then may the Auditor include such information in rendering an opinion.

The Auditor is liable to ensure that any accusation, conclusion or claim by a third party is first investigated prior to its use by the Auditor.

Ensure means to the extent necessary, before the accusations or conclusions or claims of any other third party are used for the purposes of "drawing further conclusions and opinions", the Auditor must first document that it agrees with the accusations, conclusions or claims of the third party; that they have been derived from sound reasoning; and that the Auditor itself "certifies" that the accusations or conclusions or claims provided by the third party making statement are fact-based conclusions based upon sound reasoning.

3.12 Participation with Industry Fora

As needed, the Auditor should participate in the industry fora, such as recommending improvements to guidelines as described above, or NANC process as necessary to provide feedback to effect a change in the auditing procedures or practices previously developed and implemented.

3.13 Regulatory and Guideline Changes

From time to time the NANC, regulatory authorities and/or the INC establish NANP numbering resource plans, administrative directives, assignment guidelines (including modifications to existing assignment guidelines) or procedures that affect the functions to be performed by the Auditor.

In these cases, the Auditor shall identify any corresponding changes in the cost of its auditing service within a period of not more than 20 calendar days from the date the Auditor is notified of such a (proposed) change.

Both the NANC and the INC shall be provided with a written notice and analysis explaining why the changes to the audit(s) and cost are required.

The NANC, if necessary and at its discretion, will forward to the FCC a recommendation that will include provisions for the appropriate adjustments to the service fees paid to the Auditor.

3.14 Performance Monitoring/Improvement

The Auditor shall be subject to monitoring of its performance by the NANC. On at least an annual basis, the NANC shall formally assess the performance of the Auditor, who will be required to implement any remedial action to correct performance problems identified by the NANC or its designated working group(s).

The Auditor will also be required to participate in an evaluation process formalized by the NANC that will permit industry participants and other stakeholders to provide performance assessment data and recommendations to the NANC, as well as to the Auditor, in order to cultivate continuous process improvement.

The Auditor, if required, will prepare a suggested improvement plan that will become final only after approval by the NANC.

3.14.1 Internal Performance Measurements

The Respondent shall provide in its proposal a description of a performance monitoring mechanism, developed and implemented by the Auditor for use by the NANC in tracking/evaluating performance.

The Respondent will describe the features and functionality of this mechanism in detail in their proposal.

3.15 Annual Report to the NANC

This document is published annually to report on the status of audits. Its publication should coincide with distribution of the NANPA and the PA annual reports 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. Highlights/significant milestones reached during previous year
2. Identification of existing activities and recommendations for improvements to auditing test and or overall program
3. Performance metrics
4. Scope of the previous years auditing program, e.g. number of audits conducted, types, and average length of time required to audit
5. Aggregated findings by audit type

3.16 Proposal Scenarios

Respondents should address these two potential audit universes in their proposals.

Universe 1:

The Respondent shall provide in their response details regarding their approach, application and opinion regarding the audit proposed in universe 1.

Out of approximately 4000 service providers that have been assigned Central Office codes, only about 1500 have more than six codes. Service providers with six or fewer of these codes will be exempt from random audits for CO Code guidelines.

Therefore, the universe for random audits is 1500 service providers. The remaining service providers are only subject to "For Cause" audits. Assume 36 random audits of service providers per year.

Each random audit will consist of applying five criteria from the INC CO Code Guidelines.

It is anticipated in this scenario that out of the approximately 4000 service providers, there will be a need for 75 for cause audits.

The NANPA and the PA are each a unique universe and should be audited twice per year at random times and/or for randomly selected tests.

Universe 2:

Respondents shall recommend both the quantity and scope of service provider random audits that would be appropriate to reasonably ensure the correct use of the number resource per industry guidelines.

The Respondent shall provide the anticipated volume of “For Cause” audits in this scenario.

The industry believes that at least one random audit is necessary for both the NANPA and the PA.

Respondents shall recommend the quantity and scope of these random audits considered appropriate to reasonably ensure the correct administration of the number resource per industry guidelines.

Note:

A random audit of service providers may consist of a both a random selection of Auditees from the potential universe and/or it may include a random selection of the tests in one or more of the guidelines that will be applied during an audit.

3.17 Termination for Non-Performance

If the NANC determines at any time that the Auditor substantially or materially defaults in performing its obligations, the NANC shall immediately advise the Auditor of the default, request immediate action to correct the performance, permit the Auditor reasonable time to correct its performance, and/or recommend to the FCC and other appropriate regulatory bodies termination of the Term of Administration of the Auditor.

Appendix A

The following is a current list of industry guidelines to be used in formulating a bid response.

The FCC will specify which guidelines apply in this RFP. These guidelines are in the process of spelling out compliance tests for service providers, the NANPA, and the PA; these compliance tests will be based upon administrative processes already documented throughout the guidelines. Examples of compliance test questions are noted below.

It must be understood that these guidelines are living documents and are updated periodically to optimize number administration.

** An asterisk identifies those guidelines that have been reviewed for audit procedures; all other guidelines are currently under development.*

- Thousand Block (NXX-X) Pooling Administration Guidelines (INC 99-0127-023)
- 555 NXX Assignment Guidelines (INC 94-0429-002)
- 800-855 Number Assignment Guidelines (INC 94-0401-001)
- 900 NXX Code Assignment Guidelines (INC 97-0404-012)
- Carrier Identification Code Assignment Guidelines (INC 95-0127-006)
- Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)*
- International Inbound NPA (INT/NPA/NXX) Assignment Guidelines (INC 94-0826-003)
- NPA Allocation Plan and Assignment Guidelines (INC 96-0308-011)
- NPA Code Relief Planning and Notification Guidelines (INC 97-0404-018)
- Personal Communications Services N00 NXX Code Assignment Guidelines (INC 95-0407-009)
- Toll Free Resource Exhaust Relief Planning Guidelines (INC 97-0696-018)
- Vertical Service Code Assignment Guidelines (INC 96-0802-015)
- Industry Guidelines for Toll Free Administration
- Guidelines for the Aging and Administration of Disconnected telephone Numbers (INC 99-1108-024)

Appendix B

1.1 Compliance Test Questions for the COCAG

1.2

1.3 *INC used the March 3, 2000 CO Code Assignment Guidelines to propose these compliance test questions. These questions and section/text references are subject to on-going revisions.*

The intent of this list is to help focus the auditor's efforts by providing the following sample questions. It is not intended to exclude other questions the auditor may deem appropriate to determine compliance with the entire Guideline.

1.4

These compliance tests apply to both the applicant (SP or PA) and the Code Administrator unless otherwise noted. COCAG section references are noted.

1. Has the applicant demonstrated a need when requesting an initial NXX code?

Section 4.1.1 - The applicant must certify a need for NANP numbers.
(Appendix H – Central Office Code Utilization Survey)

Section 4.1.3 - The applicant must submit an NXX request form certifying that a need exists for an NXX assignment
(Part 1 – Request for NXX Code Assignment)

Section 5.2.1

2. If applicable, has the applicant demonstrated regulatory certification?

Section 4.1.5

Section 6.1.4 - The code applicant shall certify on the Code Request Form that to the best of his/her knowledge necessary governmental/regulatory authorization has been obtained to provide the service(s) for which the code is being requested. *(Part 1 – Request for NXX Code Assignment)*

3. Is the applicant using current forms (Parts 1-4)?

Section 6.0 - Code applicants and code holders are responsible for obtaining a current copy of the Central Office Code (NXX) Assignment Guidelines.

4. Has the applicant notified NANPA when changes are made to an existing code assignment? Has NANPA verified the information supplied by the applicant?

Section 6.3.1 –Information Changes

Section 7- Criteria for the Transfer of CO Codes was the code activated on or before the requested effective date noted on Part 1 Form?

Section 6.3.2 Responsibilities of the Code Holder

Part 1 Form

5. ***Was the Part 1 Form submitted to the code administrator at least 66 days but not more than six months in advance of requested effective date?***

1.4.1.1 Section 6.2.1

6. ***Was the code put in service within six months of the requested effective date noted on the Part 1 Form?***

Section 5.4.3

1.4.2

1.4.3 Section 6.3.3 Code Use

Section 8 Code Reclamation

Part 4 Form

7. ***Does the applicant's request for additional (growth) code(s) meet at least one of the following criteria?***

Section 4.1.4.1 - The PA shall apply for additional CO Codes 1) to add resources to the industry inventory pool 2) to replenish the industry pool in order to meet a service provider's request 3) to request an entire NXX code (i.e., 10,000 numbers) to satisfy the numbering needs for a service provider's single customer 4) to request an NXX code for LRN purposes

Section 4.2.1 – For additional codes for growth the applicant must certify that their existing resources will exhaust within 12 months. By completing the appropriate forms for additional codes, the applicant certifies that their existing resources cannot reasonably meet this requirement. (See also Section 4.2.3).

Section 4.2.2 - The PA, when applying to the CO Code Administrator for additional NXX Codes, will certify that existing 1000 blocks for the rate center will exhaust within 9 months

The PA shall complete the Thousand Block Pooling Months to Exhaust Certification Worksheet - 1000 Block Level and retain in the event of an audit or regulatory initiative.

The PA, when applying to the CO Code Administrator for an NXX Code to a) satisfy the needs of an SP's single customer requiring 10,000 consecutive TNs, or b) be assigned for LRN purposes, will certify the need by providing the CO Code Administrator a copy of the "Thousand Block Pooling Months To Exhaust Certification Worksheet - TN Level" that is supplied to the PA by the requesting SP

Section 4.2.4-An additional code(s) is necessary for other reasons. The applicant must provide an explanation of why existing resources assigned to that entity cannot satisfy this requirement.

Part 1 – Request for NXX Code Assignment
Appendix B - CO Code Assignment Months to Exhaust Certification Worksheet - TN Level

8. Has criteria for reserving a code been met?

Section 4.4

9. Was the code activated on the effective date noted on the Part 1 Form?(Applicant specific)

Section 6.3.2 - The holder of a CO code (NXX) assigned by the CO Code Administrator(s) or acquired by other means such as transfer (i.e., by merger or acquisition) must use the code consistent with these guidelines. Most importantly, the new code holder must participate in the audit process (See Appendix A) necessary to effectively assess code utilization.

Part 1 Form

10. Has the code holder returned Part 4 Form (Confirmation of Code in Service) or met criteria for extension? Has the Code Administrator initiated code reclamation if Part 4 Form has not been received in the appropriate time frame?

Section 6.5 - All code holders and the PA agree to abide by the code reclamation guidelines outlined in Section 8.

Section 5.2.9 - Initiate code reclamation if assigned code is not activated and in service within 6 months of effective date.

Section 5.4.3 - Ensure that the code applicant places the code in service within the time frame specified. If the assigned code is not used within this time frame, the CO Code Administrator(s) shall request the return of the code for reassignment.

Section 8.2 - Administrator Responsibility

11. Have semi-annual Forecast and Utilization reports been submitted?

Section 6.4.1 & 6.6 – Forecast & Utilization reports will be completed and submitted to the CO Code Administrator semi-annually on April 1 and October 1. Such reports are to be provided, at a minimum, at the CO code level; service providers may also provide these reports at the thousand block level. Service providers will submit the data using the CO Code Utilization/Forecast Report (Appendix H).

12. In jeopardy NPAs, has the applicant verified compliance with requirement to submit jeopardy COCUS?

Section 9.4.4 – 9.4.4.1 - Applying for numbering resources during Jeopardy - For additional codes for growth, each code holder must certify that existing codes for the switching entity/POI, per service provided by that switching entity or POI, will exhaust within 6 months

13. Did the Code Administrator respond to a Part 1 request by returning a Part 3 Form within 10 working days? (Code administrator specific)

Section 5.2.2

14. If a code is denied, was the reason documented on the Part 3 Form?(Code Administrator specific)

Section 5.2.3 - In cases where a code application is denied, Code Administrator will provide specific reasons for the denial to the applicant in writing and information regarding where and how to appeal the administrator's decision.

14. How does the Code Administrator monitor CO code usage?(Code Administrator Specific)

Sections 5.2 through 5.2.10

15. Has the CO Code Administrator issued a request for COCUS within the appropriate timeframe?(Code Administrator Specific)

Section 6.4.1 - The CO Code Administrator will issue a request for forecast & Utilization data at least two months prior to the due date. The forecast data will be used for projecting NPA exhaust and for planning NPA code relief.

16. Has NANPA completed jeopardy notification within the appropriate timeframe?(Code Administrator Specific)

Section 9.3.1 - Jeopardy Notification

Section 9.3.2 - Jeopardy Meetings

Appendix C

Reference Documentation

1. Federal Communications Commission; *In the Matter of Number Resource Optimization, Report and Order and Further Notice of Proposed Rule Making* CC Docket 99-200, FCC 00-104 (March 31, 2000)
2. North American Number Council; *Audit Framework*, November 1999

Outstanding Questions

How would the FCC like the industry to address audits on the following:

1. Are non-US numbering resource assignments included?
2. Should DSMI and the SMS/800 be included?

Appendix E

NANPA Oversight Working Group

The following lists the members who participated in the development of this document.

Barbara Galbreath	Time Warner Telecom
Cheryl Gordon	Alltel
Eleanor Willis-Camara	Winstar
Jim Castagna	Bell Atlantic
Julie Petersen	SBC
Karen Mulberry	WorldCom
Norman Epstein	GTE
Pat Caldwell	BellSouth
Paul Lagattuta	AT&T
Tony Pupek	USTA