

***North American Numbering Council***

Meeting Minutes

July 18-19, 2000 (*Final 9.20.00*)

---

***I. Time and Place of Meeting.*** The North American Numbering Council held a meeting commencing at 8:30 a.m., at the Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Room TW-C305, Washington, DC.

***II. List of Attendees.***

Voting Council Members:

1. Beth Kistner	ALTS
2. Ed Gould	AT&T
3. Dan Hochvert	Bell Atlantic
4. Teresa Muir	Bell Canada
5. Michelle Cadin	CompTel
6. Ron Binz	CPI
7. Lori Messing	CTIA
8. David Farnes	CWTA
9. Norm Epstein	GTE
10. Bridgett Szczech	NARUC
11. Jack Goldberg	NARUC
12. Loretta Lynch	NARUC
14. Barbara Meisenheimer	NASUCA
15. Philip McClelland	NASUCA
16. Beth O'Donnell	NCTA
17. James Goldstein	Nextel
18. Dawn Lawrence	Nextlink
19. Ray Strassburger	Nortel Networks
20. Trent Boaldin	OPASTCO
21. Courtney Jackson	OUR, Jamaica
22. Harold Salters	PCIA
23. Bill Adair	SBC
24. Ron Havens	Sprint
25. John Hoffman	Sprint PCS
26. Gerry Rosenblatt	TIA
27. Paul Hart	USTA
28. Cathie Capita	VoiceStream
29. Peter Guggina	WorldCom

Special Members (non-voting):

Jean-Paul Emard	ATIS
John Manning	NANPA

Commission Employees:

Cheryl Callahan, Designated Federal Officer (DFO)

Jeannie Grimes, Alternate DFO

Barry Payne, Network Services Division, CCB

Aaron Goldberger, NSD, CCB

Sanford Williams, NSD, CCB

John Spencer, Policy Division, Wireless Bureau

**III. *Estimate of Public Attendance.*** Approximately 45 members of the public attended the meeting as observers.

**IV. *Documents Introduced.***

- (1) Agenda
- (2) NANC Meeting Minutes, May 23-24, 2000 (7.7.00 draft)
- (3) NIIF Issue 0173, Toll Free Record Application Performance Guidelines
- (4) North American Numbering Plan Administration (NANPA) Report to NANC
- (5) NANPA Oversight Working Group Report
- (6) Number Administration Auditor Technical Requirements
- (7) NANPA Performance Evaluation
- (8) NANPA Performance Improvement Plan for 2000
- (9) NANPA CO Code Volume Price Increase Recommendation
- (10) Thousand Block Pooling Administration Technical Requirements
- (11) WCOM Response to Brian Baldwin, SBC Re: Questions and Concerns Regarding UNP
- (12) Number Resource Optimization (NRO) Working Group Report
- (13) Charging for Numbers - Strawman Draft
- (14) Table of NANC Projects
- (15) Industry Numbering Committee (INC) Report
- (16) Local Number Portability Administration (LNPA) Working Group Report
- (17) Wireless Number Portability Subcommittee (WNPSC) Report
- (18) Wireless Number Portability Technical, Operational and Implementation Requirements, Phase II
- (19) Minority Opinion Regarding WNP Technical, Operational and Implementation Requirements – Phase II
- (20) NANPA Fund Performance Status Report and Funds Projection
- (21) NBANC letter to Chief, Network Services Division, dtd 7/14/00

**V. *Summary of the Meeting.***

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

**B. *Approval of Meeting Minutes.*** The minutes of the May 23-24, 2000 meeting were approved subject to minor edits submitted during the meeting and off-line.

Chairman Hoffman noted that the FCC released a Questions and Answers (Q&A) public notice in the NRO proceeding, CC Docket 99-200 on July 11, 2000. Additionally, the FCC announced that Larry Strickling, Chief, Common Carrier Bureau (CCB) will resign at the end of July, and Dorothy Attwood has been appointed as the new Bureau Chief effective July 24, 2000.

**C. Toll Free Access Codes, CC Docket 95-155.** Chairman Hoffman opened the discussion by reviewing the NANC responsibilities outlined in the July 5, 2000, Toll Free Order. Specifically, the Commission, in paragraph 28, directs the NANC to provide a recommendation on how to best administer toll free numbers. NANC is to evaluate the system of administration of the 800 database, and consider alternatives such as whether centralized ownership and operation of the database system should be transferred to a non-government and/or non-carrier entity, and whether SMS/800 service should continue to be provided under tariff. Additionally, NANC is to develop a recommendation to facilitate the selection of the administrator through a competitive bid process similar to the process used to select the North American Numbering Plan Administrator. NANC must provide its report and recommendation to the Commission within 180 days from the effective date of the order.

Chairman Hoffman noted that NANC received correspondence from the Alliance for Telecommunications Industry Solutions (ATIS) on July 14, 2000. The letter highlighted the responsibilities of the Order and Billing Forum (OBF) SMS/800 Numbering Administration Committee (SNAC) such as the identification, development and implementation of resolutions to issues in support of the 800/SMS. The letter states that a lot of research has been completed on toll free issues and provide this research to the group. Chairman Hoffman stated that a NANC IMG appears to be appropriate to accomplish the FCC assignment.

Ron Havens, Sprint, volunteered to chair the Toll Free IMG. Chairman Hoffman questioned whether as OBF Moderator, Mr. Havens would have sufficient time and resources to dedicate to the Toll Free IMG.

Peter Guggina, WorldCom, commented that there is a system capacity issue between the SCP operators and the SMS. Sprint, AT&T and WorldCom have voluntarily throttled back their orders because the volume of orders would stop the system. It is crucial for all users and operators in the 800 environment to get involved in this matter – the industry has not been able to resolve this problem within the industry forums.

Chairman Hoffman noted that if the NANC recommendation is to pursue a competitively bid administrator, then the technical requirements ought to reflect the capacity needs. Mr. Guggina responded that the technical requirements should reflect capacity needs – however, there is a crisis that exists today that needs to be corrected. Orders are backed up; there are manual restraints placed on the volume of orders that can be processed in a given period of time. This involves all transactions, new or reassignments between the SCP and the SMS.

Chairman Hoffman questioned how NANC would address Mr. Guggina's concerns as opposed to the technical requirements going forward. Mr. Guggina suggested that NANC institute an action to investigate the capacity problem and recommend how it can be fixed and then propose the solution to the Commission. A meeting of the SCP operators and the SMS operators would be helpful to get to the bottom of it by examining what the capacity is and what can be done to improve it and determine when it could be accomplished.

Ron Havens noted that Issue 173 addresses many of the capacity issues and some of the Commission's concerns as well. Mr. Havens advised that Dave Bench, Nortel Networks is the NIIF Moderator and noted that NANC has assigned work to the NIIF in the past and should count on the forum for the current Commission tasking. Additionally, Mr. Havens stated that the issues addressed in the OBF letter and the NIIF Issue 173, together would go a long way at addressing the some of the technical aspects of this discussion.

Mr. Guggina agreed, but added that that particular forum has quite a few issues to work already and recommended that NANC communicate with the NIIF and set a time limit for the activity to be completed. NANC should stress the urgency to report back in a specified period of time.

Dan Hochvert, Bell Atlantic, commented that the effective date of the order determines the 180 day deadline for the NANC assignment. Mr. Hochvert further noted that the Commission went out of its way to separate complaints and the NANC tasks -- not that there is an objection to finding solutions to problems, but to the degree that NANC is attempting to merge something that the FCC separated. He suggested that NANC stick to the task, as outlined in the Commission's order. Mr. Hochvert stated that in order to get clear delineation before NANC establishes an IMG there are several questions that need to be answered, *i.e.*, are we looking at cost as the primary driver, and with respect to the demand, is there a need for a network architecture change. The first step is to identify what issues the IMG would need to address.

Peter Guggina questioned whether to consider excluding the participation of vendors or potential vendors from the IMG as the FCC required with the development of the Pooling IMG technical requirements. With the SCP owner-operators and SMS operator there is a potential conflict of interest in light of the performance issue. Chairman Hoffman noted in the context of the Pooling IMG the excluded vendors were the potential bidders on the contract, but in the toll free matter almost anybody and everybody could be a potential bidder -- not just traditional vendors like NeuStar or Telcordia, etc., you could have carriers bidding. Mr. Guggina raised the question whether the toll free environment requires a neutral third party operator. When the existing SCP operators went into business, there were monopolies and they were providing an access function. This is a new multi-carrier environment today it raises an issue that needs to be thought through. Chairman Hoffman stated that this is a policy issue that the IMG should consider.

Dan Hochvert stated that all (SCP owner operators, etc.) parties should participate in the development of a recommendation to the Commission. However, if the recommendation

entails the subsequent bid, then there will need to be a set of requirements put together. The parties who intend to bid, would have to recuse themselves from that activity, but not from the recommendation that the FCC is currently seeking. Chairman Hoffman agreed and added that in his opinion the Commission has already resolved this issue already -- the Commission appointed the members of NANC and the Commission has directed NANC to do this work.

Paul Hart, USTA stated his support to include everyone in the first stage, because there is a need to understand the scope and the complete details of the issues from an operational standpoint. The people involved in it are in a better position to understand it thoroughly and you would not want to exclude that knowledge from the discussion. Mr. Hart added that in 1991, the companies that are now involved in provisioning the service in cooperation with Bellcore, actually went to the industry, in a very concerted effort, to offer to the industry the opportunity to operate and build the entire structure as an industry activity. The industry fled the scene in terror when they became familiar with what kinds of things they would have to sort through. However, this is a different time and different place; the reason the system is as it is today is because the FCC demanded it be so in a previous proceeding. We should use an IMG to sort these issues out and figure out what we have to go through in order to develop a plan for a new environment. With respect to the service problem, USTA has attended some SNAC meetings and there are difficulties that need to be addressed.

Norm Epstein, GTE noted that the directive to NANC is very clear and it is premature to exclude parties at this point. Mr. Guggina added that incumbent providers involved in researching the structure will have an incentive to preserve their incumbency.

Mr. Guggina added that the IMG will require experts beyond the experts at the NANC table and suggested e-mailing an invitation to other interested parties. This is highly technical -- there may be non-NANC members that will want to participate. Chairman Hoffman stated he was not sure how technical expertise plays a role in the initial policy decision as to whether or the SMS administrator should be independent. Chairman Hoffman further added that he did not know enough to know what drives that decision -- politics, resources and technical requirements and hoped that the IMG will have the resources necessary to make that decision. If the decision is that the administrator is to be independent, then move on to the technical requirements.

Dan Hochvert commented that the invitation to others to participate should be through the NANC IMG members and agreed that NANC needs to bring in experts when there are questions that IMG members and NANC cannot answer. There is a lot of emotion attached to this issue that has been worked before by NANC. We will not make a lot of progress if people do not participate -- the initial group should be drawn from NANC members, then that group meet and clarify the objectives and the second step is to determine which set of experts and agree upon who should participate as experts. Two-stage process recommended.

Chairman Hoffman stated that NANC has a specific directive from the FCC and this should not become a place where service providers continue the arguments that are being made in industry forums elsewhere, otherwise we will not meet the 180-day schedule. The effective date of the Toll Free order is the date of release.

The Council agreed to form an IMG to be chaired by Ron Havens, Sprint with the initial group of volunteers to include: Dan Hochvert, Bell Atlantic; Bill Adair, SBC; Peter Pescosolido, NARUC - Connecticut PUC; Peter Guggina or other WorldCom representative; an AT&T representative; Pat Caldwell, BellSouth; Rose Breidenbaugh, USTA, and Norm Epstein, GTE. The first conference call will be announced to the entire NANC distribution list. At the September meeting the IMG is to provide a recommendation as complete as possible.

**D. North American Numbering Plan Administrator (NANPA) Report.** John Manning, NeuStar, provided the report to the Council regarding the COCUS/NRUF Electronic File Transfer (EFT) format; NeuStar's June 30, 2000 petition for an adjustment in compensation, and NANPA proposed enterprise services with associated fees to be charged. Mr. Manning stated that development of the EFT formats will be completed by July 23 and will be posted to the NANPA web site. This also includes instructions on how to submit those file formats to NANPA. Mr. Manning stated that there will be a File Transfer Protocol (FTP) to use to send the file to by August 1. With regard to questions concerning subsequent changes made to the NRUF form, Mr. Manning stated that the file formats developed by NeuStar comport with changes made to the forms and that the corrections were typographical in nature.

Mr. Manning stated that NeuStar filed a petition on June 30, which outlined the various functions NANPA is responsible for fulfilling once the *NRO Order* went into effect. The rules require that NANPA advise the Commission within 10 working days of the order going into effect, of any requirements and changes directly impacting NANPA responsibilities. The June 30 petition lists responsibilities as it relates to central office code administration and the COCUS/NRUF changes. A schedule for implementation was included in the petition. The petition also provides a list of what NeuStar will be capable of doing with respect to a new COCUS system and the costs associated with all the tasks enumerated therein. Enterprise services were also presented in the petition. Since filing of the petition, NeuStar has had several *ex partes* with the Commission to understand the details behind the interpretation of the responsibilities and the associated costs.

On July 14, NeuStar met with the Commission staff and received written direction on how to proceed effective July 17<sup>th</sup> as it relates to CO Code administration. Mr. Manning reviewed the FCC interim NANPA compliance requirements. With regard to initial code requests, the FCC has directed NANPA to determine whether documentation is of the nature specified in paragraph 97. NANPA shall ensure that documents facially appear to conform to the facilities readiness requirements established in the *NRO Order*. This activity is expected to take 5-10 minutes per application. The NANPA shall deny CO code request only if (1) no document is provided (2) document does not conform to those

identified in paragraph 97 and (3) document does not apply to area in question or is not in force.

Paul Hart questioned whether the criteria required an independent check to verify the validity of the information submitted. Mr. Manning stated that NeuStar is to take it on face value that the service provider has provided valid information and evidence that they are ready to provide service within 60 days.

Commissioner Lynch, NARUC questioned whether NANPA, with regard to states having additional authority and have established lotteries, is going to certify something as valid with no independent check. Chairman Hoffman questioned whether the FCC criteria are independent of what the states are requiring and added that it was his understanding that the FCC has asked NANPA to process applications following its criteria which is a facial review of 5 to 10 minutes per application. In the case of certification, if a carrier makes a representation, which is not valid, then it becomes an enforcement issue for the state.

Beth O'Donnell, NCTA, added that the NeuStar petition lists several items to verify a service provider readiness and questioned whether the FCC process allows for rejection of the application if it does not contain such information. In response, Paul Hart noted that the FCC document clearly states the criteria. That NANPA shall deny CO code requests only if (1) no document is provided; (2) the document does not conform to those identified in paragraph 97, and (3) the document does not apply to the applicant, or is otherwise invalid on its face because it does not apply to area in question or is not in force.

Mr. Manning stated with regard to CO Code growth requests, that NANPA will continue to check whether the service provider has a current COCUS form on file, which would be the April 2000 COCUS form. NANPA will check the months to exhaust (MTE) worksheet calculation to ensure that the service provider's math is correct. NANPA will continue the existing practice wherein if there is a significant difference between utilization and forecasted demand for a particular rate center it will contact the service provider to discuss/verify the spike in demand.

With regard to state commission access to CO Code application data, the *NRO Order* stated that states would have access to this information; the June 30 petition requested clarification on what is required of the NANPA. In response, the FCC document makes it clear that NANPA is not directed to make any CO Code application materials available to the states. NANPA shall not spend extra resources by providing such materials to state commissions.

Cheryl Callahan, Designated Federal Officer (DFO), stated with respect to item five of the FCC instructions, states have jurisdiction over the carriers and the state commissions can get applications directly from the carrier. The instructions given to NANPA were not intended to preclude the states from getting access to the applications. However, we do not want NANPA expending substantial resources in processing requests for copies of applications. Loretta Lynch, questioned whether this precludes those states that have

additional authority and have independent contracts with the vendor to run lottery systems from obtaining this information. Ms. Callahan stated that independent contracts are not affected by this action.

Barbara Meisenheimer, NASUCA commented that unless a state has not ordered service providers to provide a copy of the application concurrently to the NANPA, the first opportunity that a state would know when an assignment has taken place is through the NANPA.com web site. Mr. Manning added that the web site is updated weekly with this information.

Jack Goldberg, NARUC stated that many of the wireless carriers feel that state commissions do not have authority over them, and questioned whether NANPA would consider it a substantial expense to e-mail a state commission when it receives one of these requests. Mr. Manning responded that NeuStar will have to examine that approach and how it can be done. Norm Epstein, GTE cautioned that using email raises concerns for maintaining the confidentiality of the data.

Loretta Lynch questioned whether states can order service providers when they send applications with supporting data to the NANPA to also send a copy to the state. Ms. Callahan confirmed that the *NRO Order* does not preclude states from getting information directly from carriers.

CO Code Reclamation. Mr. Manning stated that the process used today will continue to be used going forward under the FCC direction for the time being. Once the effective date of a code has come, a service provider has 6 months to get that code in service. NANPA, after the 6-month interval, has 60 days to get back in touch with the service provider if no Part 4 has been provided. Presently, service providers have 6 months after the effective date to get a code in service; based on the direction provided by the FCC, the same process will continue after July 17<sup>th</sup>. NANPA will continue to do what it has done for the past two years or more, until directed otherwise. To start the reclamation, the carrier will be requested to provide the Part 4 Form, if they do not, then NANPA develops a list of all those codes in their respective states and provides it to the state commission. The state commission determines whether that code is to be reclaimed.

Chairman Hoffman, with regard to the June 30 petition – confused as to what NANC's role is in this whole process with NRO taking a look at the additional duties being imposed on NANPA as a results of the COCUS requirements in the Commission's NRO Order. His impression is that NeuStar has preempted that effort with this petition to the Commission to choose which it wants NANPA to do and then give them until September to get it started. It is not clear whether under the Commission's rules at 47 CFR 52.12(c) if a petition is the right way to accomplish that because the rule stated that the Commission on its own initiative can decide whether to adjust the compensation. Chairman Hoffman further added that he would not want NANC or the NANC Legal Working Group to address those issues unless the Commission directs NANC to do so.

NANC does have a responsibility to look at substantive issues such as costs, whether there is additional work being done, or will be done by NANPA as a result of the *NRO Order*, and whether it should be compensated in addition the current compensation. Since there is no NANC meeting in August, if the NRO WG is to look at the issues raised in the petition, NANC is not in a position to provide that information to the Commission until September. NANPA has asked for at least interim order as of July 17<sup>th</sup>, to require NBANC to adjust the allocation factor immediately to start collecting, at least on an interim basis, more money to pay NANPA. Depending on what the Commission rules subsequently on the petition, make a true-up somewhere down the road, up or down. NBANC sent a letter to the Commission, with a copy to NANC, reacting to the June 30<sup>th</sup> petition, confirming that there is no money to cover the proposed increased compensation. As of today, the Commission has not ruled on the petition, either on an interim basis or otherwise. In the context of the NANPA Oversight Working Group (NOWG), NANC needs to talk about what it wants to do to respond to the petition.

Beth Kistner, ALTS, commented that the NOWG is looking at the increased volume of code request for additional compensation, and questioned where does that fit into the June 30 petition, or is that a separate matter. Understand these are separate issues, one is stemming from the *NRO Order*, and one stemming from activity that exceeds contract terms. John Manning responded that the CO Code volume issues are raised in the June 30<sup>th</sup> petition, and that the NOWG has addressed and developed a recommendation for increased CO code volumes from the beginning of the contract to June 30, 2000. The monies identified in the petition reflect both the prospective volume increase and implementation of the *NRO Order*.

Beth O'Donnell, NCTA, questioned with respect to carriers having to take their inventories from 9 to 6 months at least for the next 3 months, if NANPA anticipates a drop off of in CO code requests. Mr. Manning commented that the MTE is the inventory, 6 months of utilization information and 12-month forecast to justify that they need a code within the next 12 months.

Beth Kistner opined that as the inventories are reduced from 9 to 6 months, theoretically you would see a continual or permanent decline in code requests. This would be brief period of months while drawing down your inventory. It is not a lot -- but if you are in a jeopardy situation you might not be holding the full amount of inventory allowed.

Chairman Hoffman stated that the June 30 Petition is asking for compensation for CO Code volume requests; additional duties imposed by the *NRO Order*, primarily COCUS, and (3) the new enterprise services.

Harold Salters, PCIA, distributed copies of a motion for extension of time filed on July 14, 2000, jointly by ALTS, CompTel and PCIA of the filing deadline for the Number Resource Utilization/Forecast Report (NRUF), FCC Form 502, seeking a 90 day stay in August 1, 2000, deadline.

Also, it was noted that OPASTCO and the Rural Cellular Association and the National Telephone Cooperative Association have filed similar petitions for an extension of time.

***E. NANPA Oversight Working Group (NOWG) Report.*** Pat Caldwell, Co-Chair provided the report to the Council which included an update on the finalized 1999 NANPA annual performance evaluation; development of the Auditor Technical Requirements document, and advised that a work plan is in place for the drafting of the new NANPA Technical Requirements Document. Additionally, the NOWG addressed the CO code price adjustment request.

NANPA Annual Performance Evaluation. Mr. Caldwell reported that changes were made to the recommendation section, page 45, item 2 – Communications and Responsiveness by eliminating an earlier NOWG recommendation for an industry notification process.

Performance Improvement Plan for 2000. Ron Conners, Director, NANPA Administration, provided a review of the NANPA's improvement plan. Among the eight items listed, NeuStar has initiated a continuous performance review process. Rather than wait for an annual review it is monitoring itself through customer surveys as code requests and assignments are made. With regard to correct consistent and uniform application of the guidelines, NANPA has prepared methods and procedures for code administration (4Q00) and relief planning (3Q00) to reinforce consistency. NANPA has also established a formal complaint process to immediately notify NANPA if there is problem. Complaints will be logged and investigated; NANPA will work through the NOWG to get the problems resolved. Additionally, NeuStar is developing a new automated system, the Code Administration System (CAS) which is expected to be complete by September 2000. In the future, NANPA would like to tie the CAS into the web site to provide timely information on code assignments.

Chairman Hoffman requested clarification on how to proceed with regard to complaints that he receives directly about NANPA performance; to ensure that such complaints will be identified, logged-in and recorded so that there is a response given to each one. Mr. Conners stated that NANPA and the NOWG are working out the details on such a process and will publish the procedures. Pat Caldwell stated, with regard to the process developed by NeuStar to improve credibility and eliminate confusion between NeuStar and NANPA roles and responsibilities, that the NOWG believes the process will not be successful.

Loretta Lynch, NARUC, questioned what gave rise to the recommendation on page 45, item three, bullet point two which states that "NANPA must ensure that all code administrators and relief planners apply the industry guidelines in the same manner to eliminate the possibility of different interpretations." Ms. Lynch further questioned how NANPA would implement such a process, observing that whatever is done must be consistent with the expanded authority that some state commissions have to conserve their numbering resources. Mr. Caldwell stated that some service providers observed

inconsistent application of the guidelines in certain geographic locations, and added the NOWG is currently addressing this issue.

Chairman Hoffman commented that the performance evaluation would not impinge on any state authority -- NANPA has administrators around the country and the concern is that they may not be acting consistently with respect to federal rules and industry guidelines. It is acknowledged that code administrators should comply with the state requirements that are imposed upon them. Ms. Lynch noted that industry guidelines are sometime vague and ambiguous and states fear that there are potentially different interpretations. Norm Epstein, GTE, explained that the points noted were gleaned from specific comments made by respondents to the performance survey. Mr. Caldwell added that NANPA is required to identify when an industry guideline is ambiguous or inadequate and bring it to the attention of the Industry Numbering Committee (INC) for resolution (to make it clear). Ms. Lynch suggested adding language to the recommendation by inserting "not ambiguous or inadequate" after "industry guidelines" and further added that NANPA has an affirmative duty to bring ambiguous or inadequate guidelines to the attention of the INC and/or the FCC for resolution.

Chairman Hoffman reiterated that it is clear that NANPA must follow state requirements and in the case of overlapping gray areas NANPA tends to go directly to the FCC for clarification. Ms. Lynch raised a concern that in the interim NANPA gets to decide whether the guideline is ambiguous and that the state would then be stuck with the decision regardless of the additional delegated authority. Dan Hochvert stated that it is clearly recognized that states may take action, under delegated authority, that may conflict with industry guidelines. Bill Adair agreed and further noted that decisions are made by NANPA everyday -- the expectation is that they will make that same decision in the same manner with every application.

The Council accepted the NOWG recommendations, subject to the modified language, and agreed to refer the performance report to the Commission.

Audit Requirements Document. Mr. Caldwell noted that Appendix A lists all the numbering guidelines, including guidelines which are not NANPA related and stated that the Commission will have to decide which of the guidelines an auditor will audit against. With regard to NANPA participants that are not in the United States as far as auditing is concerned, the NOWG requested clarity on what the industry should do. Secondly, should the audit include SMS/800 resources, noting that the document currently does not include DSMI or SMS/800. Mr. Caldwell stated that the NOWG assumption was that the audit process would be applicable only to U.S. service providers, and suggested the cover letter to the Commission highlight these two matters. The Council accepted the Audits Requirements Document and there was no objection to forwarding the document to the Commission.

Work Plan for Development of NANPA Technical Requirements Document. The NOWG, assuming that a Pooling Administrator will be selected by September 2000, and that clarification of the *NRO order* will be complete, believes it would be in a position to

provide a draft proposal to the NANC for initial review by May 1, 2001. NANC would complete its review by July 2001 and forward the NANPA Technical Requirements Document to the Commission. It is anticipated that the Commission would issue the document for comments and that an RFP would be released by November 2001, providing respondents three months to reply. Selection of a new NANPA by July 2002 and the transition between the existing NANPA and a newly appointed NANPA would be completed by November 22, 2002.

Chairman Hoffman questioned the assumption that the PA would be selected by September 2000. Mr. Caldwell agreed that it should be revised. The 1K Pooling IMG is model for procurement integrity. With regard to questions raised by the NOWG concerning the timing of contracts for the PA and NANPA - co-terminous or separate, Ms. Callahan stated that one contract is not dependent upon the other and therefore the contracts do not have to necessarily be co-terminous. The NANPA and the PA may be two separate entities.

CO Code Adjustment Recommendation. Mr. Caldwell discussed the NOWG's evaluation (workflows and quantification of why NANPA is asking for the increase) of the one time adjustment through June 2000 for central office code volume over and above the current NANPA contract. Key considerations assumed the baseline was 10,000 per year over a period of five years. NANPA reports that is processed over 40,000 code requests in year two of its contract and is on track for over 48,000 for this year. NANPA has the option to come to the Commission when it exceeds 120% of its original bid projection for code assignments to cover the unexpected volume. The one time adjustment does not include anything that is in the June 30 filing which covers July 1 through the rest of the contract. COCUS, additional work functions on an assumed 44,000 codes per year. That includes the unexpected volume and the original 10,000 level work.

Norm Epstein stated that the price adjustment is contingent on the number of actual code assignments and not code applications as it is stated in *Third Report and Order*. Mr. Epstein noted that there is a difference between requests and assignments. NANPA actually made 27,000 assignments. NANC needs to have an understanding of that issue before it can fully consider the adjustment recommendation.

Beth Kistner noted that the work is generated on the number of requests and not on the number of assignments, notwithstanding the word used in the Commission's order. If it was based on assignments, it would seem to be a disincentive. Lori Messing, CTIA, commented that NANPA is held to the guidelines when making assignments and therefore there is no built-in incentive to make inappropriate assignments. Beth O'Donnell stated that part of what drives the applications (requests) are lotteries with service providers having to reapply – the process generates a lot of paper. Ms. O'Donnell further added that the FCC has been involved in this exact language dispute before, and opined that the correct answer is number of assignments made and not number of requests.

Norm Epstein explained that there are a number of categories included in “requests” and one of those categories is indeed assignments. Peter Guggina commented that the Commission’s order states assignments, but NANC should be reasonable and if NANPA has expended more work than originally anticipated by their bid then they should be compensated.

Chairman Hoffman questioned whether or not there are sufficient funds available to make a lump sum payment of \$3,130,103 and whether NANCV should request an increase in the NBANC contribution factor. Chairman Hoffman commented that he was not sure that this could be done without going through the NBANC process. He further added that the process is complicated by the fact that the NANPA has come to NANC for review of the costs for past work, and has approached the Commission for the money in the future.

Beth Kistner suggested that the NANC make a recommendation to the Commission that does not tie the Commission’s hand with respect to considering the content of the June 30 petition. If NANC feels there is a reason to interpret the Commission’s contract language to include or consider significant levels of work that were greater than anticipated because of the request volume as opposed to the assignment volume, NANC is free to make that recommendation if we feel it is deserved. She suggested that the Commission should decide whether the exact letter of their order is what controls here. Chairman Hoffman expressed concern that by providing the recommendation for payment of the \$3 million that it would give NeuStar ammunition to use to support its June 30 petition.

Norm Epstein noted that the instant request and the June 30 petition are intertwined in that NeuStar has included funds for increased activity for code requests processed in the future -- they have incorporated the same concept into those numbers for the future. The number of pools established across the country will impact the number of CO Code requests that NANPA would have to process. This particular factor has not been included in the NeuStar projections simply because they do not know what to subtract and this is a fixed price contract. Chairman Hoffman questioned whether NANC should consider making a recommendation regarding items included in the June 30 petition.

Jack Goldberg, NARUC stated that NeuStar is entitled to compensation for past work. Numbering issues have exploded over the last two years and NeuStar dealt with these matters in good faith by providing services in good faith and deserve to be paid in good faith. He further noted that the ability to make a lump sum payment of over \$3 million dollars is a separate issue. Dan Hochvert commented that he is troubled by the idea that a contractor would proceed without approval to do additional work. NeuStar has been slow in coming to NANC and that fact would influence how much he would recommend for compensation, and as a result would tend to want to lower the amount requested.

Chairman Hoffman commented that as of September 1999, John Manning, NeuStar reported on increased code volume requests and assignments -- there is nothing hidden about the growing volume of work over the last year. The issue needs to be resolved is whether this work should be considered requests or assignments. Bill Adair noted that NANC should not quibble about whether NeuStar should have approached NANC sooner

with this matter – technically they did by way of their monthly status reports to the NANC. The request for additional compensation for increased volume of code requests should be distinguished from the June 30 petition.

With regard to the matter of lump sum payment, Mary Pat Brennan, NECA, stated that NBANC will do what the Commission directs it to do. NBANC is confident that the Commission will take into consideration what the account balance is when they provide such direction. NBANC looks to the Commission to either authorize a lump sum payment or direct an increase of the monthly payments to NeuStar.

Beth Kistner added that the NANC should recognize over the last three years within the industry things have turned out far beyond what was predicted at the time of bidding process. The contract did anticipate and intend to compensate in the event that things were drastically off – as they are today. It would be disingenuous to say that we did not ask NANPA to hire new people in order to stay on top of the workload. However, it is important to ensure that there are no attempts to make up costs or shortfalls through the new or existing enterprise services.

Mary Pat Brennan clarified that NBANC files a request with the Commission for an adjustment in the allocation factor once a year. Payment of a million dollars a month as suggested in the June 30 petition going forward, plus a lump sum amount for the past CO code work is a concern for NBANC. It is difficult to separate the \$3 million dollar one time payment from the other money. Anne La Lena, WorldCom added that NBANC has already changed the allocation for this fiscal year (July 1 to June 30). Typically, NBANC files its request to adjust the factor by late April or early May.

Chairman Hoffman stated that compensation is due and suggested that the NOWG go back and report in September on three different looks at the numbers and NANC will decide at the September meeting what level of compensation should be recommended. NANC will work with NBANC to develop an appropriate allocation factor. NANC asked NBANC to provide options for collection and payments to NANPA for the additional work that they have done. Anne La Lena clarified that NANC's recommendation will help the Commission understand, but that NBANC does not proceed until directed by the Commission.

Beth O'Donnell asked whether there is a legal question concerning NBANC's ability to make payments for past work. Chairman Hoffman noted that the contract allows for adjustments when the work exceeds 120% of the estimate. Anne La Lena stated that there is no prohibition, however, there is no specific language that addresses this question. It was suggested that the Legal Expertise Working Group review and provide an analysis on this matter.

Chairman Hoffman suggested that with regard to the June 30 petition NANC, the NOWG should look at three issues in NeuStar's petition – additional compensation for CO Code volume requests; additional cost imposed on NANPA as a result of NRO Order; and enterprise services.

Chairman Hoffman asked whether NANC should work on these matters to understand the basis of the request and make a recommendation or a suggestion to the Commission. which because of the meeting schedule cannot take place until September.

Peter Guggina suggested that the Cost Recovery Working Group (CRWG) should look at the numbers after the NOWG has completed its analysis. The NOWG has the expertise on the NANPA issues and should do the regression analysis, then CRWG can figure out how to go about recovering those costs, if that is the case. Anne LaLena, CRWG Co-Chair agreed with the suggestion.

Cheryl Callahan, DFO, stated that the Commission has begun some preliminary analysis of the June 30 petition and under the time constraints has not been able to do a detailed analysis of it. However, specific items have been identified by the FCC for NANPA to proceed with without incurring what might be considered additional costs. The Commission is looking at potentially providing some type of interim relief with a true-up mechanism; it has not yet been determined whether to seek a recommendation from the NANC at this time. Ms. Callahan further stated that FCC staff members are working to understand what is behind the numbers that the NANPA provided in its petition. The Commission is not close to figuring out what is a reasonable amount. NeuStar's view of what is considered additional work may differ from what the Commission sees as additional work effort that is required as a result of the *NRO Order*. At this juncture, the Commission staff is still at a stage of understanding what additional work effort is required.

**H. *Number Pooling Issue Management Group (IMG) Report.*** Peter Guggina, IMG Chair provided the report to the Council. Copies of the working draft document were circulated by e-mail in advance of the meeting, minor edits have been made to the document previously circulated to the Council. The IMG met with the FCC to convert the earlier PA requirements document into technical requirements to be inserted into an FCC Request for Proposal (RFP) for competitive bids. The charge was to complete the requirements by the end of June.

The document is divided into four sections, with a focus on the technical and operational type issues. However, some business issues were left in the document and it was assumed that if the FCC wants to remove them it would do so. The approach the IMG took with the matter is that the industry is buying a set of services and it is getting a system that will transfer to a succeeding pooling administrator at the end the first contract.

The IMG is recommending that the term of this administration be co-terminous with the NANPA term of administration. The system is a stand-alone system that is not integrated with other systems. It is envisioned that the electronic file interface should be easy to use and have business to business type Internet arrangements. The document specified a delivery and acceptance schedule and some preliminary specifications. The detailed

design of the system would be provided by the bidders. There is a provision for an industry project plan and design review and a penalty for non-performance.

A chart was provided that depicted the pooling environment with all the necessary interfaces. This reflects the functions as well as the systems and entities that a pooling administrator would be required to deal with. Pooling administration is a complex environment with a lot of elements. The PA requirements document is an umbrella document that will guide the bidder to the FCC rules, INC guidelines, the NPAC, the LERG and other various elements that must be considered when formulating their bid. The IMG was careful on setting up a pricing option – in view of the earlier discussions regarding the NANPA contract. The PA pricing is broken down into key buckets of tasks and functions, which are then broken into recurring and non-recurring costs. The elements selected by the IMG are the basic elements, bidders may propose further details if they desire.

Beth O'Donnell stated with respect to page 28, that it was her understanding the forecast by the PA is an individual forecast for rate center and not NPA exhaust. It is not envisioned that the PA would give any kind of information on when an NPA would likely exhaust. Peter Guggina responded that the PA will take the pooling data analyze it and provide it to the NANPA. Gil Orzoco, SBC, added that the PA would not have access to non-LNP capable carriers' data and would have only information necessary to size and populate the pool(s). The PA provides aggregated forecast information to the NANPA. Consolidated forecasts for the pool are provided to the NANPA, which will fold that data into its non-pooling data in addition to the COCUS data. Beth Kistner noted that the problem is not only over-forecasting. The relationship is not spelled out in the *NRO Order* – it's a double counting of the costs and the data – two providers, NANPA and the PA, are developing the ability to collect and analyze the data. It does not make sense for carriers to provide data to two different entities. Bill Adair stated that the *NRO Order* states that carriers must provide their forecast and utilization data to the NANPA (by 1K block data) and would be provided to the PA in order to size the pool. The PA then aggregates the data, to make it a reasonable forecast because each carrier is forecasting greater market share than they may ultimately attain in a given area. Peter Guggina commented that the requirements document should be modified to clarify the PA's responsibility to analyze and aggregate the data.

Beth O'Donnell questioned whether the NANPA's annual performance evaluation would have to be coincident with the PA annual performance review. Karen Mulberry stated that the reason for the coincident report would be to gain a full picture of what is happening with pooling and with NANPA.

Mr. Guggina noted that the PA should have the same authority to withhold resources as the NANPA. The INC guidelines are being modified to be consistent with a pooling environment. Mr. Guggina suggested that the FCC reporting rules will need to be converted over to the pooling environment; the Commission will have to clarify what procedures apply to the pooling administrator and to the carriers.

Chairman Hoffman thanked the 1K IMG for their tremendous work effort. The Council agreed to forward the PA Technical Requirements to the Commission. Minor editing will be completed and the finalized draft will be re-circulated by e-mail to the Council.

**G. *Charging for Numbers – Discussion Group.*** Phil McClelland provided an update to the Council. The strawman draft for potential submission by the Discussion Group to the NANC was e-mailed to the Council in advance of the meeting. Mr. McClelland reported that the group has worked on the report for three months and has held a number of conference call meetings. There are no specific issues that need to be addressed by the Council at this time. The Group is continuing to work on the draft report.

There is a discussion in the document on the primary market where service providers would be charged for numbers. Additionally, there is a discussion about allowing the secondary market as an alternative. It is an opportunity for carriers who have numbers to offer them for a price to other carriers. The Group has drafted a report which does not contain a recommendation, but spells out the pros and cons of each option.

Chairman Hoffman stated the final discussion on this topic would take place at the September meeting. He suggested that the Council consider some of the consequences which flow from a market based approach to number assignment. He compared a possible scenario to spectrum licensing wherein the FCC has the right to reclaim it if it is not used. Dan Hochvert noted that the objective is to use numbers more wisely. Mr. McClelland added that one of the advantages of the secondary market is that it gives you some means of stepping into charging for numbers without taking the full plunge. He further opined that there are problems with the primary market approach – such as the unknown price of numbers. He noted that a secondary market might give some experience on a trial basis. The next conference call for the Discussion Group will be announced by e-mail.

**F. *Numbering Resource Optimization (NRO) Working Group Report.*** Eleanor Willis, Co-Chair provided the report to the Council. With regard to fees for the extensions for reserved telephone numbers, the NRO developed some modifications to previous agreements reached. Ms. Willis reviewed some of the points of discussion.

Dan Smith, representing ACUTA, stated that it is important for certain large end users, in this case, colleges and universities to indefinitely extend the reservation period as long as they paid the fee that is eventually determined or decided by the FCC. ACUTA sent a letter to the NRO WG and the Council outlining the concerns of ACUTA. These large users of numbers reserve them in order to create a community identity and to facilitate communications systems on their campuses, or in the case of state government unique identifiers. These end users are willing to pay a fee to reserve large blocks of numbers and will make the economic sacrifice in order to preserve this right.

Returning to the discussion points, Ms. Willis noted that the WG debated whether to consider (in the developing proposal) if there is a fee for a reservation extension would

the associated numbers be credited towards a carrier's utilization rate. Additionally, the WG has concluded that such charges should be uniform and established on a national basis. The WG suggested that the revenues collected in excess of a service provider's costs could be reported on an annual basis to NBANC and applied to number administration purposes.

Brian Baldwin, SBC-Ameritech, commented there are other alternatives to reserving numbers, such as the aging process before having to do anything with them. However, the NRO focus is on purely reserved telephone numbers that have not been activated, where the customer has asked to have them retained on their behalf. Reservations for carriers or non-carrier entities have not yet been considered by the WG.

COCUS (NRUF) Requirements Document. Ms. Willis advised that document is being developed as a stand alone to be later incorporated by the Commission in an RFP. The WG is waiting for input from the NANPA on the EFT requirements. At this time the document is not ready for distribution.

Status of UNP Impact ¶231. Ms. Willis stated that the NRO is seeking clarification from NANC on what the work expectation is with respect to the *NRO Order*, paragraph 231. Chairman Hoffman stated that the NRO WG was assigned to develop a draft report responsive to paragraph 231 for the Council's review and consideration. The deadline is November 2000. Ms. Willis further commented that the NRO WG would like input from NARUC and NASUCA members so the WG can have a broad industry consensus on the work that is produced. Trent Boaldin, OPASTCO, noted that the NANC April 25-26, 2000, Action Items and Decisions Reached state that the specific assignment to the NRO WG is to respond to the last two sentences in paragraph 231 of the *NRO Order*.

Pooling Matrices. Beth O'Donnell provided a brief update on the tracking of pooling trials through the use of the matrices. It has been noted that seven of the NPAs selected to be pooled have fewer than 25 rate centers. Several states with delegated authority for pooling have established utilization threshold rates in connection with pooling, except for Texas and Florida. Ms. O'Donnell stated that it is becoming difficult to obtain information to populate the matrices. The value of continuing to update the matrices was discussed and the Council decided to suspend this activity; NANC will decide later whether to return to the tracking of the state pooling trials.

***Wednesday, July 19, 2000***

***I. Steering Group Report.*** Jack Goldberg, SG Co-Chair provided the report to the Council. Mr. Goldberg stated that Ron Binz, Competition Policy Institute announced to the SG that CPI would be resigning as of the September meeting.

Harold Salters, PCIA advised the SG with regard to concerns raised with the U2, U3 and R4 forms that NeuStar has corrected the error.

The proposed NANC meeting schedule for the first half of 2001, was considered by the SG and recommended that the full Council adopt the following schedule: January 16-17; February 20-21; March 20-21; April 17-18; May 22-23 and June 19-20. The NANC agreed to adopt the schedule.

Norm Epstein reviewed the updates to the NANC Table of Projects -- completed projects were moved to the reverse side of the matrix. With respect to item 2, development of NANPA technical requirements, a due date of 5/1/01 was established as reported out by the NOWG.

It was agreed that the Legal Expertise WG will consider whether NBANC is precluded from collection for past work.

**J. Industry Numbering Committee (INC) Report.** Norm Epstein, INC Moderator, provided the report to the Council stating that the INC has not met since the June NANC meeting. The next INC meeting will be held on July 24-28 in Albuquerque. There is also an August 15-17 interim meeting for pooling and unassigned number porting (UNP) issues. The full INC meeting is scheduled for September 11-15 and will be held in Cleveland, Ohio.

Mr. Epstein stated that INC has updated and released the Pooling and the CO Code guidelines. INC also issued NRUF guidelines to comply with the FCC Order for the new Forecast and Utilization Forms (FCC 502). Additionally, he noted that the Commission's response to the INC questions, which were included in the July 11<sup>th</sup> NRO Q&A public notice, would be incorporated into the guidelines.

With regard to the development of the draft report on UNP a draft document is now posted to the ATIS/INC website. This draft includes all contributions received to date.

**K. UNP Study Group.** Karen Mulberry, WorldCom provided an update on the group's activities. The Study Group met by conference call to discuss the contributions received on business rules. A July 24<sup>th</sup> conference call has been scheduled to review and develop the draft business rules, which will be circulated by e-mail. Additionally, any outstanding items will be discussed on the July 24<sup>th</sup> conference call. Ms. Mulberry reported that WorldCom has responded to SBC/Ameritech's written questions and concerns regarding UNP issues from April 12, 2000. Copies of the response were provided to the Council members.

**L. Local Number Portability Administration Working Group (LNPA) Report.** Co-Chairs Charles Ryburn and Brian Egbert provided the report to the Council.

Wireless Number Portability Subcommittee (WNPSC) Update. Mr. Egbert stated that the completed WNPSC Report on Wireless NP Technical, Operational and Implementation Requirements, Phase II, was circulated to the Council in advance of the meeting and is now available on the LNPA WG web page. The report is to be finalized at the September 19-20 NANC meeting. With regard to NPAC testing notification, the SC obtained a list

from 200 to 400 CMRS providers for notification regarding the 2001 NPAC certification and turn-up testing. It was noted that 30% of wireless activations occur on Saturday, and it was noted for the West Coast about 30% of all wireless activations occur after 7 p.m. central time. Mr. Egbert advised that the Test Team is progressing on the Inter-carrier Test Plan.

Changes, comments or suggestions on the WNPSC Report should be communicated between now and the September meeting. Mr. Egbert requested that, given size of the report, this item be provided more time on the September agenda schedule.

Peter Guggina requested that WorldCom's Minority Opinion, which was circulated to the Council at the same time as the report, be attached to the report, included in the table of contents to the report as well as cited in the cover letter to the FCC. Brian Egbert stated that it was WG consensus that the minority report was not applicable to this report, but a separate issue. This is a technical and operational requirements issue, not germane to the instant report. Paul Hart agreed that the WorldCom opinion should be attached to report. Mr. Egbert stated that the WNPSC would add the minority opinion to the report and include it in the appendices.

Mr. Ryburn announced a change in Co-chairs. Shelly North, Nextlink will no longer serve as co-chair and the LNPA WG recommends Steve Addicks, WorldCom, as the CLEC co-chair replacement. The Council approved the selection.

A draft of the Third Report on Wireline Wireless Integration Report will be circulated to the NANC by September 30.

NPAC SMS Release Status. With regard to Release 3.0, Mr. Ryburn advised that NeuStar has reported 85% of vendors have completed ITP testing, and all carriers are scheduled for turn-up testing. The statement of work for Release 4.0 has been delayed for 60 days due to LLC negotiations.

Problem Issue Management (PIM). A description of PIMs 1, 5, 6 and 7 was provided. Multi-service provider (reseller) flows; inadvertent porting; NENA request for standard on unlock/migrate transactions during porting (E911), and placement of filters for downed associations during porting. Mr. Ryburn explained that during porting if the association is down it causes a partial failure.

Slow Horse. Steve Addicks, WorldCom provided an update to the Council.

Chairman Hoffman advised that there is no formal LLC report for this meeting.

***M. North American Numbering Plan Billing and Collection (NBANC) Report.*** Mary Pat Brennan provided the report to the Council. On June 28, the FCC released an order approving the revised contribution factor. The existing contribution factor of .0000577 was reduced to .000043. The adjustment will result in refunds to carriers who have already paid based on the November 1999 estimate. Following the filing of

NeuStar's June 30 petition, NBANC sent a letter to the FCC advising that the amount requested in the petition exceeds the funds available for payment.

With regard to \$1.07 million in refunds to carriers, the NBANC Board decided during its July 7<sup>th</sup> conference call to treat all carriers consistently. Ms. Brennan noted that at this time there is no change to the NBANC contract (increase payment for services). However, if there are multiple changes to the contribution factor, NECA may seek additional funds to cover increased administrative costs.

Fund Status. The current balance is \$6.7 million; projected receivables for year 3 are \$5.6 million; payments to NeuStar to date total \$1.6 million; payments to NECA total \$96.3K; Board expenses to date total \$4.3K.

**N. *NANPA Report Follow-Up.*** John Manning stated that NANPA will investigate the feasibility of providing e-mail alerts to state commissions on large volume code requests. In doing so, NANPA will consider the associated costs and provisions to maintain the confidentiality of carrier-specific information.

NANPA Enterprise Services. John Manning reviewed the proposed enterprise services. One service is to provide the ability for service providers to file by fax their forecast and utilization forms. Mr. Manning noted that so far NANPA has received many inaccurate filings, such as receiving a utilization report without a forecast; instances of no OCNs or SP name, no identification. The proposed fee is \$53.46 for filing by facsimile, which includes the labor costs to manually enter a carrier's data into electronic form. Paul Hart, USTA, stated that USTA would work with NANPA to educate smaller carriers; and explore options for smaller carriers.

NANC authorized the above enterprise service. It was agreed that the remaining enterprise services, customized data reports, would be reviewed by the Council and decided at a later meeting.

**O. *Proposed Issue Management Group (IMG) on Unified Messaging Services (UMS).*** Chairman Hoffman reported on his attempts to contact e-fax. Telcordia has offered to provide a tutorial on how the UMS type-services work. Several NANC members stated their support for obtaining additional factual information before deciding on whether to explore the UMS use of numbers through establishment of a NANC IMG.

Chairman Hoffman commented that NANC should be thinking about three basic questions, who makes up the UMS marketplace (efax, et al.); what is the impact on the NANP, and what are the options. Jo Anne Sanford, NARUC, supported developing an IMG to explore the use of numbers by UMS businesses because many of them are coming to states with large requests in NPAs that are near exhaustion. The Council agreed to gather more information and decide at the September meeting whether or not to establish a UMS IMG.

The meeting was adjourned at 11:25 a.m.

## **VI. Action Items and Decisions Reached**

1. North American Numbering Plan Administration (NANPA) Report. NANPA to investigate feasibility of e-mail reports/alerts to state regulators on application activity (cost and confidentiality to be taken into account).
2. In the Matter of Toll Free Service Access Codes, CC Docket 95-155. Pursuant to paragraph 28 directive, NANC agreed to form an Issue Management Group (IMG) chaired by Ron Havens, Sprint. First conference call meeting will be announced by e-mail to all NANC members. The Toll Free IMG will report at the September 19-20 NANC meeting on the scope of work and work plan. The IMG will notify NANC by August 31 on preference for competitive bid for 800 data base administrator; if yes, IMG should provide technical requirements as complete as possible at the September meeting.

*Toll Free Order* effective upon release (July 5, 2000).

NANC letter to NIIF urging action on Issue 173, Toll Free Record Application Performance Guidelines. NANC needs NIIF response by November 2000.

3. NANPA Oversight Working Group. NANC approved the Number Administration Auditor Technical Requirements. Requirements will be forwarded to the Chief, Common Carrier Bureau.

The NOWG should assume the 1K Pooling IMG is the model for procurement integrity and detail. Pooling Administration and NANPA technical requirements should be worked separately.

Legal Expertise Working Group will report in September whether it will be possible to respond to NANPA's request for additional payments for past work.

Assignment to NBANC – provide options for collection and payments to NANPA for the additional work that they have done.

No NOWG assignment regarding NeuStar June 30 petition; FCC action is pending.

Entitlement to additional compensation calculation. NANPA asserts that it has \$3.1 million in out of pocket costs due to an increased volume of central office code application processing. NOWG will work with the NANPA to perform additional analysis to better explain and justify costs using 3 different approaches, top-down, bottom-up and out-of-pocket and will report results at the September NANC meeting.

NANC approved the 1999 Annual Performance Evaluation Report with changes. Section 11 Recommendations, (3) Guidelines/requirements, second bullet item modified to include the following sentence: "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.” Approved report forwarded to the Chief, Common Carrier Bureau.

4. Number Resource Optimization (NRO) Working Group. Pooling matrices to be suspended for a time; NANC will determine later as to whether to continue monitoring.
5. Pooling Issue Management Group. Technical requirements recommendation approved by NANC with caveats and agreed modifications to be forwarded to the Chief, Common Carrier Bureau by July 21, 2000.
6. Charging for Numbers Discussion Group. Comments on the white paper are to be provided to Phil McClelland; final discussion at September meeting.
7. Local Number Portability Administration (LNPA) Working Group Report. At the September NANC meeting, NANC will review and approve Wireless Number Portability Subcommittee (WNPSC) Technical, Operational and Implementation Requirements finalized report which will include the WorldCom minority opinion. Opinion(s) will be listed in the table of contents and referred to in transmittal letter to Chief, Common Carrier Bureau.

The Third Wireline Wireless Integration Report will be finalized and submitted to NANC for review by September 30 for discussion at the October 17-18, 2000 NANC meeting.

LNPA WG leadership changes approved – Steve Addicks approved as Co-Chair to replace outgoing Co-chair, Shelly North.

8. NeuStar Enterprise Services. NANC approved one of three proposed enterprise services -- paper submission of numbering resource utilization and forecast reporting. The NOWG will review the remaining two services, customized data report schedule, and historical central office code applications report, and provide a report to the NANC at the September meeting.
9. Unified Messaging service presentation to be provided by Telcordia at September meeting.