

North American Numbering Council
Meeting Minutes
June 20-21, 2000 (final 9.19.00)

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 12th Street, S.W., Room TW-C305, Washington, DC.

II. List of Attendees.

Voting Council Members:

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| 1. Beth Kistner | ALTS |
| 2. Shawn Murphy | AT&T |
| 3. Dan Hochvert/Chuck Eppert | 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. JoAnne Sanford/Erin Duffy | NARUC |
| 11. Peter Pescosolido | NARUC |
| 12. Greg Pattenaude | NARUC |
| 13. Jack Leutza | NARUC |
| 14. Barbara Meisenheimer | NASUCA |
| 15. Natalie Billingsley | NASUCA |
| 16. Beth O'Donnell | NCTA |
| 17. James Goldstein | Nextel |
| 18. Shelly Shaw | Nextlink |
| 19. David Bench | 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/Karen Mulberry | WorldCom |

Special Members (non-voting):

- | | |
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| 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

John Spencer, Policy Division, Wireless Bureau

III. *Estimate of Public Attendance.* Approximately 39 members of the public attended the meeting as observers.

IV. *Documents Introduced.*

- (1) Agenda
- (2) North American Numbering Plan Administration (NANPA) Report to NANC
- (3) NeuStar ltr to Chief, Network Services Division, CCB, dtd June 9, 2000
- (4) New York PSC ltr to Chief, Common Carrier Bureau, dtd June 20, 2000
- (5) NANPA Oversight Working Group Report
- (6) Number Resource Optimization (NRO) Working Group Report
- (7) Fees for Extensions of Reserved Numbers Issues
- (8) Pooling Trial Summary Report
- (9) Industry Numbering Committee (INC) Report
- (10) Local Number Portability Administration (LNPA) Working Group Report
- (11) Wireless Number Portability Subcommittee Report
- (12) LSMS Availability Requirement (Slow Horse)
- (13) NANPA Fund Performance Status Report and Funds Projection
- (14) Deputy Chief, CCB ltr to Alliance for Telecommunications Industry Solutions (ATIS), Re: NANP Expansion Assumptions
- (15) Table of NANC Projects
- (16) NANC ltr to Chief, CCB, Re: Data Collection
- (17) NANP Expansion – A Fresh Look, Presentation by U S West
- (18) Strawman draft – NANC Report to the FCC on “Charging” for Telephone Numbers

V. *Summary of the Meeting.*

A. *Opening Remarks.* Chairman Hoffman provided opening remarks and announced that draft May 23-24, 2000 meeting minutes were not ready for circulation to the NANC at this time, but should be available within the next several days by e-mail. Any comments, edits or changes should be made prior to the next meeting so that the finalized minutes may be distributed at that time.

Chairman Hoffman welcomed three newly appointed NANC members to the Council -- Courtney Jackson, Office of Utilities Regulation, Jamaica; David Farnes, Canadian Wireless Telecommunications Association (CWTA) and Jack Leutza, Telecom Division

Director, California Public Utilities Commission (CPUC), serving as alternate for Loretta Lynch, President, CPUC who was unable to attend.

The Numbering Resource Optimization *Report and Order and Further Notice of Proposed Rulemaking* was published in the Federal Register on June 16, 2000; the effective date of the order is July 17, 2000, except for the rule pertaining to the data collection, 47 CFR 52.15(f). Office of Management and Budget emergency approval for the collection has been requested and is expected by June 23, 2000. Additionally, the comment period for FNPRM comments is now June 30, with reply comments due on July 7, 2000. These dates will be relevant later in the meeting when NANC gets to the discussion concerning charging for telephone numbers.

B. North American Numbering Plan Administration (NANPA) Report. John Manning provided the report to the Council on the following topics: (1) The NANP exhaust projection (without NRO measures); (2) first quarter 2000 central code office assignments; (3) NANP exhaust projection assumptions (with pooling); (4) reserved NPAs for geographic relief; (5) state specific CO code administration processes and procedures; (6) NeuStar/NANPA identification, and (7) CO code volumes.

NANP Exhaust Projection (without NRO Measures): The projection is based on the June 2000 assumptions developed in coordination with the NRO Working Group and were reviewed at May 23-24 NANC meeting. Mr. Manning emphasized that the exhaust projection *does not* factor in the impact of the various measures included in the FCC's Numbering Resource Optimization *Report and Order*. The quantity of NPA codes used for the initial run was 692 with a yearly CO code demand rate of 22,200 over a 5 year period. This analysis produces an exhaust date of 2012. The 22,200 figure is significantly higher than what the actual assignment history indicates, which is approximately 15,000 per year because rationing is in place in a number of area codes. The study did not include rationing but used industry-reported demand, but rationing will continue in many area codes and thereby suppresses demand. Therefore, a projection was made based on a "rationed" demand, 15,600 codes per year, which is closer to the current historical usage and results in an exhaust date of 2017. The final projection, based on the assumption that the demand rate will level off and go down as the local service area matures, used a demand rate of 13,400 which produces an exhaust date of 2019.

Mr. Manning explained that a sensitivity analysis was conducted using 692 NPAs and then using 772 NPAs. The analysis using 772 NPAs reflects the addition of 80 codes from the N9X area codes, which may potentially be available for a NANP expansion method that does not require the use of those codes. The exhaust date with 772 NPAs is 2014 as compared to 692 NPAs and the exhaust date of 2012.

Chairman Hoffman noted that the results, the 2012 exhaust date, differs from the NANP exhaust report provided last year. One of the primary differences between last year and this year is the current projection was based on an NPA by NPA analysis whereas last year's report was based on the NANP as a whole. Chairman Hoffman suggested that last year's report should not be used as a basis for comparison. He expressed his belief that

the NANP will not exhaust in 2012 because this projection does not include any of the NRO measures. NANPA will produce an exhaust projection by the September 19-20 meeting, which will reflect the impact of implementing thousands-block pooling and other conservation methods that can be measured from the *NRO Order*. When NANC receives that forecast then it will have an idea of the affect of thousand-block pooling, and a more reliable and meaningful projected exhaust date. Chairman Hoffman further cautioned that no one should get too excited over the 2012 exhaust date as presented – it is a worst-case scenario.

Norm Epstein, GTE, questioned Mr. Manning whether the 2012 exhaust date reflects a worst case scenario, knowing that it does not take into account any of the optimization techniques. Mr. Manning noted that the demand rate of 22,200 codes per year is not likely to continue over time and agreed that exhaust date of 2012 would be a worst case scenario.

Paul Hart, USTA, commented on the sensitivity and public reaction to the NANP exhaust projections, especially in light of the reaction when last year's exhaust projection was made public. Mr. Hart further added, that this study (2012) takes some of the edge off the concern we had a year ago, but is not a time for complacency. There are still so many variables in this projection. It would seem that this forecast would allow us to be more relaxed, and less hyper on when the NANP will ultimately exhaust – this has a lot to do with how you deal with the exhaust of the NANP and looking forward to transition to a completely different system. Mr. Hart asked NANPA to share the implications of its 2012 projection.

Mr. Manning commented that the emphasis needs to continue on anNPA by NPA basis. He reemphasized that the current study was done based on NPA specific demand and overall demand was not apportioned amongst the NPAs as was done in the last study. Mr. Manning emphasized that the assumptions are different and, therefore, the current study cannot be compared to the one from last year – different methodologies were used. Mr. Hart questioned what would have been the result if the current methodology had been used last year.

Chairman Hoffman noted that NANPA is working with the NRO WG on the assumptions for the exhaust projection which include thousands block pooling. Bill Adair, SBC, questioned whether there will be a consistent report going forward – commenting that there is value in retaining the current assumptions. Chairman Hoffman added this methodology is so much better than what was used previously, which was the best we could do at the time, but we need to keep improving process. Mr. Adair further questioned who within the NANPA organization prepares the exhaust reports. Mr. Manning stated that the NPA by NPA analysis was provided by the Central Office Code administration function in Concord, CA and added that this method of NPA by NPA analysis will be retained going forward.

Mr. Manning affirmed that the Canadian request for reservation of 20 NPAs was not included in this projection, and further noted that the difference between the exhaust dates 2012 and 2017 is rationing -- which is the primary driver. Chairman Hoffman

observed that information from the COCUS reports submitted by service providers was used to produce the 2012 forecast. Actual historical assignment data and growth information were used to produce the 2017 forecast. This is less than what was requested.

Natalie Billingsley, NASUCA questioned how the non-rationed demand was calculated. Mr. Manning stated that the demand was calculated using service providers' COCUS reports, coupled with historical information to produce the demand for each NPA per month.

Chairman Hoffman repeated that this projection is a base case with no optimization methods and noted when the model is revised to account for thousand block pooling it will provide a more accurate picture of what the exhaust date should be. Chairman Hoffman expressed concern that wide publication of the current study would be misleading. NANC members have access to this model. Bill Adair noted that there are several exhaust projections in the report and yet even NANC has only focused on the 2012 date. He cautioned that even NANC members should exercise care in using the model and making a pessimistic assessment.

Mr. Manning continued with the report and noted a significant increase in NXX reclamation/returns – more reclamation during the first quarter 2000 than in all of 1999. Paul Hart questioned whether this is a sustainable trend or whether once service providers return codes that are not needed that trend will decline. Mr. Manning attributed some of the reclamation volume to service providers which have aggressive plans that did not mature. There has been a notable increase month by month in the number of returned codes, in November 1999 163 codes were returned compared to 430 codes in May 2000. State commissions are placing emphasis on NPA exhaust; if service providers are not going to use the numbers, they should return the codes. Currently, there are 2,004 Part 4 forms that have not been returned, so there is potentially a lot of codes that could be coming back. Paul Hart questioned whether there is a relationship between NPAs in rationing and returned NXX codes. Mr. Manning indicated he would go back to see if there is a pattern.

Mr. Manning reviewed the proposed NANP exhaust assumptions with pooling. As outlined in the *NRO Order*, thousand block pooling will be rolled out in the top 100 MSAs. The assumption for deployment is that only NPAs with 50% or more of their rate area in the top 100 MSAs would be included. With regard to the reduction of CO code assignments as a result of pooling, in Illinois the 847 and 630 NPAs experienced a 70% reduction in assignments (each having 25 or more rate centers). Therefore, it was decided that a 50% reduction would probably be a fair number to use as an assumption.

Beth O'Donnell commented in response to a question regarding the affect on NANP exhaust of CMRS providers participating in pooling and their reduced use of rate centers. She stated that because there is so little information on CMRS providers that it was impossible to come up with a number. Therefore, the NRO WG proposed 10% as an additional reduction in the assignment level per NPA. This estimate is based on NRO-

WG's assessment that CMRS providers have fewer rate centers, and it was assumed they may have a higher utilization level.

Ron Binz, CPI, questioned whether in the development of the factors listed in assumption (4) if experience from the Illinois pooling trial is reflected. Mr. Manning stated that in the 312, 847 and 630 pooling implementation some calculations saw up to 70% reduction of assignment after pooling was implemented. However, the 312 saw a 30% increase in assignments, which is counter-intuitive. Brian Baldwin, SBC-Ameritech, added that in Illinois they have been unable to determine why an increase rather than a decrease in assignments occurred.

Chairman Hoffman queried the NANC on whether there was general agreement on the assumptions. The Council accepted the proposed assumptions.

Reserved NPA codes. In response to an action item from the May 2000 NANC meeting, NANPA prepared a list showing a total 242 reserved NPAs that have been set aside for NPA relief planning purposes, which does not include the 20 reserve codes requested by CRTC. This figure is lower than the figure reported at the April meeting due to assignments made and other adjustments since April 1, 2000.

Beth Kistner, ALTS, noted that the list provides a way of seeing how many NPAs over the next 20 years will be utilized but it does not correlate with the NANP exhaust projections of 2012 or 2017. Mr. Manning stated that the reserve table is not intended to reflect demand. It reflects what has been reserved but not necessarily what is needed.

State Specific Procedures. Mr. Manning reported that the North Carolina Utilities Commission (NCUC) has requested that it receive notice from the NANPA of CO code assignment requests for five or more codes in advance of assigning the code. In response, NANPA, in a letter dated June 9, 2000 advised the FCC of the NCUC request and asked for direction on how to proceed on this issue.

Chairman Hoffman opined that it is entirely legitimate for a state to know when service providers request resources. The problem arises when a state commission steps in to stop the assignment. This could become challenging for NANPA if the volume of states requesting this service increases. Dan Hochvert commented that the New York PSC is working within the assignment timeline to review applications; and in his view, there is no damage done as long as there is no action taken by the state. This is a review process. Jo Anne Sanford, NARUC, responded that the NCUC is mindful of the need to review large NXX codes requests within the timeline for making the assignment. Mr. Manning also stated that NANPA received a code request for 41 codes with no supporting information and NANPA denied the request.

Michigan. On June 9, 2000 NANPA was directed by the FCC to release a code to AT&T Wireless in the Flint rate center in the 810 NPA, and was further directed to convene an industry meeting to reconsider the rationing plan for 810. NANPA must submit an industry consensus plan to the Common Carrier Bureau by August 8th.

New York. NANPA received a relief plan for the 716 NPA which splits rate centers – estimated duplicate codes are 29 codes in 14 rate centers. NANPA denied the request for a new NPA and wrote a letter to New York Public Service Commission (NYPSC). The NYPSC in turn has petitioned the Common Carrier Bureau for relief. Greg Pattenaude, NYPSC, stated that the NY PSC has responded to the denial this morning stating that the NANPA decision should be overturned. Chairman Hoffman questioned whether this rate center split assignment situation fits the Common Carrier Bureau’s *deminimus* rule – NANC will have to wait for the Bureau to act.

NANPA and NeuStar Identification. Mr. Manning reviewed four recommendations, which were developed in an effort to reduce confusion surrounding NANPA’s performance as a neutral third party administrator and in cases where NeuStar is representing other services to the industry. The recommendations are designed to identify the roles and responsibilities of NeuStar personnel as they relate to NANPA in their participation in industry meetings.

Chairman Hoffman questioned why Ron Conners, Director, NANPA does not attend the NANC meetings and asked what role John Manning plays in the organization. Mr. Manning responded that Mr. Conners is focused on the day-to-day NANPA activities, which consume nearly 100% of his time. Mr. Manning added that he serves a support role to the NANPA organization and that they both report to the same vice president.

Bill Adair stated that there should be a clear delineation between the duties and roles. Mr. Manning stated that NeuStar and NANPA have internally gone to great lengths to avoid conflict. As an example, during a pooling meeting in Florida, NeuStar was requested by the Florida PSC to utilize the NANPA document distribution system for purposes of reaching all services providers. Gilbert Orozco, SBC, questioned whether the responsibility to determine the impact of pooling on an NPA is NANPA’s or NeuStar’s. Mr. Manning stated that the PA determines the affect of pooling and not the relief planner.

Peter Guggina noted that the recommended practices in place for NANPA should be the same for the pooling administrator (PA). Mr. Manning stated that this list would be provided to the NANPA Oversight Working Group (NANPA OS WG). Pat Caldwell, Co-Chair, NANPA OS WG questioned whether the upcoming neutrality audit would cover these issues. Mr. Manning stated that the audit does not go into the functions performed but to the code of conduct of NeuStar.

Central Office Code Volume. Mr. Manning reported that NeuStar is preparing a request for an adjustment in compensation due to the volume of CO code requests received May 1998 through April 2000. Under 47 CFR 52.15, the NANPA is permitted to seek additional compensation when the volume of code assignments exceeds 120% of the volume assumed in its contract. The fixed price contract was based on volumes of 10,000 per year and the actual code requests for year one totaled 17,240, year two 44,595 and year three (March through April only) are currently at 8,616. The adjustment request

will be based on years one and two in which the volume of code applications exceeded 170% and 420% respectively.

Chairman Hoffman stated that the assignment to review the finalized proposal should be assigned to the NANPA Oversight WG to review the facts and develop a recommendation back to NANC. The Council agreed.

FCC Form 502 – Status. On June 14, 2000, e-mail was sent to the Council members advising that the FCC had sought emergency approval for the new forecast and utilization data collection, FCC Form 502 from the Office of Management and Budget (OMB) by June 23, 2000. The first data collection is scheduled for August 1, 2000. The emergency approval is limited to a 6-month period. Copies of the form are available on the NANPA.com web page. In terms of process, the FCC will publish a document in the Federal Register announcing the OMB emergency approval and the effective date of the rule, 47 CFR 52.15(f) which mandates reporting by all service providers.

Electronic File Transfer (EFT) Format. John Manning stated that NANPA has not yet defined the EFT format. Within 30 days of the effective date of that rule, NANPA will have the EFT format published and available for downloading from the NANPA.com web site. NANPA did not want to begin development of the file format until OMB approval is granted. Therefore, an EFT file format will be available by the August 1, deadline.

Norm Epstein expressed concern about the availability of the EFT format because GTE needs to be able to file information on an electronic basis. Chairman Hoffman commented that due to the timing of the filing requirement and availability of the EFT format that the FCC may be looking at waiver requests from service providers to delay the August 1 deadline. Paul Hart requested clarification of the emergency approval process, and whether the process allows for comment, appeal, or any input from the industry permitted on the forms.

Chairman Hoffman restated that NeuStar committed to providing the electronic file transfer format for service providers within 30 days of June 23, 2000 (OMB approval). Mr. Manning clarified that NeuStar will have the EFT format available for service providers to download and then transfer their information (data) to NANPA. Peter Guggina commented that if the EFT format is provided by the end of July, for companies the size of AT&T, GTE and WorldCom this will be a problem – if you only have one switch maybe it is not a problem. Getting the format and instructions at the end of July could be a major problem in meeting the August 1 deadline; and, therefore many companies may petition for extensions of time to file. Chairman Hoffman added that individual carriers need to address their concerns with the FCC. Beth O'Donnell, commented that if a service provider does not have a lot of CO codes it will fill out the forms and may mail or fax the submission, but will this cost extra because it was not submitted electronically as the rules indicate. Mr. Manning stated that NeuStar is in the process of developing some applications, which will be filed with the FCC within the next two weeks, outlining how NeuStar will be able to implement the *NRO Order* as it

relates to NANPA responsibilities, specifically CO code administration as well as COCUS. With regard to the FCC Form 502, it is an Excel spreadsheet that can be filled out and saved as a file and e-mailed to NANPA.

Harold Salters, PCIA, stated that the timelines would have only worked well if the Report and Order was published in the Federal Register between April 10 and 15. Now at June 23, looking at a timeframe of July 23 for an electronic filing platform. He questioned whether the FCC is considering on its own motion extending the August 1 deadline by 60 days to reflect the extended timeline that service providers have been under from April 15th to today, or whether it would be appropriate for NANC to make a recommendation to the FCC concerning an extended deadline for the August 1 COCUS filing. Chairman Hoffman stated that it would not be appropriate for NANC to make such a recommendation because NANC does not represent carriers. As a federal advisory committee it only makes recommendations on policy issues.

Mr. Salters added that the purpose of NANC and the COCUS is to accumulate accurate information, and NANC certainly does have a compelling interest in the validity and accuracy of the data. Cheryl Callahan, DFO, stated that the FCC has worked with NeuStar to develop the data collection form and released an informational copy of the FCC Form 502 in advance of the OMB approval to allow carriers to begin making the necessary system changes to meet the August 1 deadline. The FCC has not considered delaying the August 1 filing deadline.

Bill Adair, commented that the FCC has done its level best to get the forms out for the first collection, but that something needs to be considered beyond just collecting the data is whether NANPA will be prepared to manipulate the data is the next step. There is no defined process today for transmitting the data. Data collection is a huge effort, but the organizing and manipulation of the data is even greater. The data will be useless unless it is defined how it will be translated; the right way the first time is critically important. Without the EFT format, filing will be a major problem – electronic filing is the only option for larger carriers like SBC.

Beth Kistner suggested that NANC may want to communicate to the FCC the doubts about the ability to collect and use the data. Chairman Hoffman opined that it seems speculative that the time crunch will factually impact the validity of the data. He suggested NANC may be in a better position at next month's meeting to evaluate this issue. At this point, the imposition caused by the short timeframe is carrier specific and they should act individually.

Peter Guggina commented that several members have a different opinion and expressed a desire to make a communication to the FCC to inform it of this factual situation. He suggested that NANC members are “expert” enough to describe “facts” to the FCC and that NANC as a federal advisory committee should provide factual information to the FCC concerning this matter.

Beth Kistner added that it is more than just the timing, it has to do with the fact that the collection and transfer of the information has not been sufficiently worked out in advance, that the volume of inconsistent information that will be dumped on NANPA will make it unusable. The reliability of the data is much more a concern, than just having enough time for carriers to file.

Dan Hochvert suggested an offline drafting of a communication to the FCC for further consideration by the NANC after lunch. Chairman Hoffman agreed and suggested that Peter Guggina and others work on a draft.

Bill Adair stated that the “what” is not at issue here, but how are we going to get the data to the NANPA and the usability of the data for state commissions that become the key issues. John Manning stated that NeuStar will detail in its filing with the FCC what it can do with the information and what it will be able to provide to the states. It is recognized that the system development would take 9 to 12 months. The goal is to provide the mechanism to service providers to be able to report this data. The form is available (spreadsheets) and the EFT format will be available.

JoAnne Sanford observed some states have been in a dilemma as to whether to proceed with individual reporting requirements. She reported that the North Carolina Commission ordered carriers to report by July 31 after a lot of deliberation and with some reluctance, but did so out of concern about the quality and the likelihood of the August 1 filing coming off on time. She stated that North Carolina does not intend to continue in a duplicative fashion but are concerned that if things are not in place this Summer, it would have to wait for the federal filing results and could perhaps wait a very long time. She stated her support to delay the federal filing requirement.

C. North American Numbering Plan Administration (NANPA) Working Group Report. Pat Caldwell, Co-Chair provided a brief status report to the Council. With respect to the 1999 NANPA performance review the WG is addressing two key issues -- credibility (NeuStar/NANPA identification) and a system of public notification of Commission contacts. The WG will provide a combined performance review and the NANPA improvement plan at the July 18-19 NANC meeting. Mr. Caldwell stated that the auditor technical requirements will be presented at the July meeting.

D. Numbering Resource Optimization (NRO) Report. Beth O’Donnell, Co-Chair provided the report to the Council. Paragraph 14 of the *NRO Report and Order*, directed the NANC to work with NARUC to compile the uniform definitions for the secondary category of numbers. NARUC, through the State Working Group chaired by Trina Bragdon, reviewed the NRO consensus document and suggested a few edits, which were accepted by the NRO WG. The NANC accepted the secondary definitions as modified. A cover letter with the attached document will be forwarded to the Chief, Common Carrier Bureau.

Pooling Matrices. Ms. O’Donnell stated that information responsive to items 7, 8 and 9 of the matrix concerning the quantity of carriers that are LNP capable is just not readily

available. The NRO WG questions whether it should continue to populate the matrix or is monitoring of pooling moot in light of the *NRO Order*. Peter Guggina commented that this tracking should be a requirement for the PA as part of the RFP, and that it could be added to the technical requirements as a possible optional report. Chairman Hoffman suggested and the NANC agreed that the 1K Pooling IMG place this as an optional item in the RFP for the bidders to bid separately. In the meantime, the NRO-WG asked to continue to gather the information to the extent available. Barry Bishop, NeuStar stated that a lot of the information is available on the numberpool.com web site.

Ms. O'Donnell also noted that modifications to matrices B and C have been made.

Fees for Extensions of Reserved Numbers. In responding to the directive in paragraph 25 of the *NRO Order*, the NRO WG has reached three agreements concerning reserved numbers. (1) End users should be allowed to retain their reservations; (2) there should be some disincentive, or criteria, that would dissuade all end users and all carriers from extending reservations for an unlimited period of time, and (3) extensions should be limited in duration and subject to a pre-set criterion that discourages use of extensions – any disincentive associated with granting extensions should apply to the end-user and not to the service provider. Some of the assumptions are as follows: (1) Carriers will collect the fee and the reservation extension fee will be greater than the carrier's administrative costs in maintaining the reservation; (2) the fee must be large enough to provide a disincentive to reservation extensions, and (3) any revenue from fees charged for reservation extensions should not be retained as a windfall for carriers.

Bill Adair commented that 30 days from the effective date of the *NRO Order*, which is July 17, 2000, all existing reservations would be no longer valid.

Ms. O'Donnell provided a list of issues for NANC information that the NRO developed as it addressed the topic of fees for extensions of reserved. The final report will be presented at the September 19-20 NANC meeting.

Unassigned Number Pooling (UNP) and Individual Telephone Number (ITN). Ms. O'Donnell reported that the NRO WG has not yet begun to address these issues due to the focus on the secondary definitions and reserved numbers. The report is due to the NANC by the November 28-29 meeting.

COCUS Requirements Document. Ms. O'Donnell reported that a working draft of the requirements document is now available on the NRO WG web page. Norm Epstein stated that INC has edited the CO Code Administration guidelines to reflect the *NRO Order* and FCC Form 502 revised reporting requirements. Brian Baldwin added that the EFT interface specifications are needed to complete the requirements document and since NANPA has advised that those specifications are not yet available, the WG will leave a placeholder in the document for placement later. A status report on this matter will be provided at the July meeting with a final report to be presented in September.

NANP Exhaust Assumptions. The NRO WG will review the exhaust projection assumptions used by the NANPA after data is collected in August 2000 and again in February 2001.

D. Industry Numbering Committee (INC) Report. Norm Epstein, Moderator provided the report to the Council. Mr. Epstein reported that since the May NANC meeting, the INC has held an interim CO/NXX workshop on May 30-31 and an interim LNPA workshop on June 1-2. The full INC meeting, INC-50 was held June 12-16. Upcoming meetings are July 24-28 in Albuquerque and August 15-17 interim LNPA workshop in Seattle. The September 11-15 full INC meeting will be held in Cleveland. All parties are invited to attend these meetings – they are open forums and encourage participation from all industry segments and regulators as well.

Status of INC Guidelines. Issue 243 was closed to incorporate the *NRO Order* requirements into the Thousand Block Number (NXX-X) Pooling Administration guidelines. Other than the clarification questions posed to the FCC, the INC has completed its work on the guidelines. If further information or direction is received from the FCC, INC will amend the guidelines as appropriate. This workshop will now work on UNP and other pooling issues.

Peter Guggina stated that the question of who the service provider will provide its forecasting reporting data to has come up in the context of the 1K Pooling IMG's work effort on the technical requirements. The *NRO Order* refers to the NANPA as the single point of contact for reporting data in paragraph 40. However, both the PA and the NANPA need forecasting data. He suggests clarification of this issue is necessary for purposes of developing the pooling technical requirements. He stated that NANC should recommend that service providers are required to provide forecast data to NANPA and in a pooling environment to the PA. The IMG will conclude its work on June 30.

Mr. Epstein noted that INC included a proposal that both the PA and NANPA receive data at the same time. However, only forecast data and not utilization data is needed for the PA to produce the forecast for the pool. This proposal did not give the details on how this should be accomplished. Chairman Hoffman noted that paragraph 40 clearly directs sending data to NANPA, but does not foreclose sending the data to another entity, such as a pooling administrator. NANC agreed that the INC should proceed and the IMG should add the requirement that the data should be sent to both the PA and NANPA.

Greg Pattenau, NARUC, inquired whether INC will address how pooled resources will be administered when the demand exceeds supply in a rate center. New York has been working on this issue with the carriers and has not come to any conclusions, partly because carriers believe that this should be handled nationally and especially since state pooling trials must comply with national guidelines by September 1, 2000. Currently, the guidelines are silent on this matter and would be subject to interpretation by a pooling administrator. Bell Atlantic (BA) has provided a contribution to INC regarding this issue. This issue comes up when the PA is limited in assigning 1K blocks in a rationing

environment and the ability to replenish the pool is limited. Mr. Epstein advised that INC has not yet dealt with the BA contribution but will at its next meeting.

Mr. Epstein further reported that the CO Code guidelines have been updated to comply with the FCC Order, and that there is a notice posted with the document that states that the revised guidelines cannot be used until the effective date of the *NRO Order*, July 17, 2000.

Issue 216 – Designation of 37X or 96X to a non-geographic, technology specific application (e-fax). INC has developed an issue resolution statement and recommends that these types of services not be assigned non-geographic resources. These services complete calls on a geographic basis and are rated and charged accordingly. INC has initially determined the use of non-geographic resources will require development of new infrastructure for access, rating and billing to support the use on these non-geographic resources. Additionally, non-geographic resources traditionally require the translation to geographic numbers for routing purposes and would therefore consume up to twice as many numbering resources compared to using only geographic numbers. Mr. Epstein stated that unfortunately, no e-fax provider responded to the INC's outreach initiative.

Chairman Hoffman suggested, and the Council agreed, to direct a letter to one of the larger e-fax type companies with an invitation to attend a NANC meeting to provide a tutorial on the unified message services.

Mr. Epstein reported that INC has selected a new Assistant Moderator, Scott Ludwikowski, Sprint PCS.

E. Letter to the FCC Regarding August 1, 2000 COCUS and NANPA Readiness. Peter Guggina read the draft letter (developed by the ad hoc group over the lunch break) into the record: “The Commission released its NRO order on March 31, 2000 and published its order in the *Federal Register* on June 16, 2000. The rule governing the format of data for August 1, 2000 COCUS reporting deadline will not be published in the *Federal Register* until June 23, 2000. At the June 20, NANC meeting NANPA committed to providing the format for the EFT within 30 days of the date the FCC publishes its rule on the data format, which is June 23, 2000. Moreover, NANPA stated that the interface for this EFT would not be available until after August 1, 2000. The NANC believes that the FCC should carefully consider the impacts of this schedule on its requirements.”

Chairman Hoffman stated that he thought the point to be made was the issue of forcing the submission of data under unsettled circumstances could affect the quality of the data and therefore the usefulness of it. Harold Salters stated that the purpose of the letter is to place on the record that receiving the forms now is insufficient time to meet the August 1 deadline. Chairman Hoffman questioned whether the concern is that the EFT and forms will require quick action with the integrity of the data and the granularity of data and the format in which it is to be provided is not settled. Mr. Salters added that the format will not be available until June 23rd and there is simply not enough time to get it.

Dan Hochvert added that, as an advisor to the FCC, NANC has an obligation to voice concerns but also to provide advice. He suggested that the letter should be less confrontational and more advisory with a recommendation for action.

Beth Kistner agreed that NANC should be helpful to the FCC and provide specifics about the amount of time needed for testing of the EFT transfer. Chairman Hoffman questioned whether the problem is an EFT that has not been tested and approved, or is the problem that the filing deadline is going to result in carriers filing inaccurate data. Perhaps NANC should recommend that carriers not file in such a short timeframe and be given an additional 30 or 60 days to file. Ron Binz supported sending letter in large part because NANC has worked with the new COCUS and noted that it is important to get a quality COCUS the first time around. Mr. Binz supported language that NANC members are committed to a quality reporting for the first expanded COCUS but that the compressed timeframe may militate against a quality report.

John Manning stated that the EFT format would be available but the electronic interface would not be ready by August 1, 2000. NeuStar does not have the time to build an interface in that amount of time and does not have a set schedule as to when the interface specification will be completed. Service providers may place data in the EFT format and send the data to NANPA. The problem is that there is no system to feed that data into for data manipulation, analysis and reports that will be requested by state regulators.

Bill Adair stated that SBC is committed to giving the data on August 1; but getting the format 8 days prior to August 1 gives SBC cause for concern. Mr. Adair stated that SBC will file the data if required to do so, but he is not sure about the quality of the data that will be filed. Mr. Adair questioned what NANPA would do with the data once they receive it -- NANPA will have it and the state commissions will want to have access to the data. Barbara Meisenheimer, NASUCA stated that the NANC letter to the FCC should note the burden for both the states as well as the carriers.

F. *Unassigned Number Pooling (UNP) Ad Hoc Report.* Karen Mulberry reported that the Ad Hoc group held a conference call on June 7 and has scheduled another call scheduled for June 30 to discuss business rules. An update report will be provided to the NANC at the July 18-19, 2000 meeting.

G. *Local Number Portability Administration (LNPA) Working Group Report.* Co-Chairs Shelly Shaw and Brian Egbert provided the report to the Council. Mr. Egbert presented the Wireless Number Portability Subcommittee (WNPSC) update on the wireless number portability report; NPA 2001 testing notification; modification to the business days scope in the NeuStar master contract, and announced approval by the CTIA Board of the Intercarrier Communications Process report on June 15, 2000.

Mr. Egbert noted that that WNPSC has received a minority report from WorldCom for inclusion in the Wireless Number Portability Report. The final report will be presented

to the NANC at the July 18-19, 2000 meeting. The WNPSC requests that the report be placed in the NANC Table of Projects.

Shelly Shaw reviewed the LNPA report with the Council. With regard to the ongoing development of the Third Wireline Wireless Integration report, Ms. Shaw stated that a draft will be reviewed at the August LNPA meeting with the final report delivered to NANC by the end of the third quarter. The WG is continuing to explore solutions to E911 issues with NENA.

NPAC/SMS Release Status. With regard to release 3.0, the number pooling task force worked to revise the migration plan for 3.0 implementation. The revised plan will be posted on the NPAC web site. Ms. Shaw added that going forward all number pooling issues will be worked within the WG's regular agenda. With regard to release 4.0, a statement of work has been received by the LLCs from NeuStar and is now in the negotiation stage. With regard to release 5.0, the WG is working to prioritize the changes orders included therein. To give the Council an idea of what is included in release 5.0, a list of the change orders was provided.

Steve Addicks provided a final report on the development of the LSMS Availability Requirement, otherwise known as the "Slow Horse" issue. As background, Mr. Addicks explained that when an end-user's telephone number is ported from one switch to another, information necessary to route traffic through the PSTN must be distributed to all service providers that deliver traffic to the involved NPA-NXX. The NPAC distributes ported number information to each service provider's LSMS. If a service provider's LSMS is not available when the NPAC attempts to deliver such information, the service provider's routing database is not correct and calls originating from that service provider to the affected ported number may not complete properly.

A "percent availability" can be determined after the accumulation of six months of data are collected and reported by the NPAC. This reporting capability is provided in Release 4.0 which is expected to be implemented by October 2001 which will provide sufficient information to develop an appropriate LSMS availability requirement by April 2002.

H. Pooling Issue Management Group (IMG) Report. Peter Guggina provided an update to the Council stating that the IMG is close to completing its work on the PA technical requirements and expects to resolve outstanding issues on a June 27, 2000 conference call. The IMG will complete its work by June 30. In order to meet a commitment for delivery to the FCC on the technical requirements, the NANC would have to hold a conference call meeting before the next scheduled meeting on July 18-19. The Council agreed to send a letter to the Chief, CCB advising of the delay.

Chairman Hoffman noted that a response to the intellectual property rights matter was received on June 7, from the Chief, CCB. The letter addresses the transfer of systems and property used for numbering administration. It should be referenced going forward with regard to the methods and procedures for national numbering procedures.

LLC Update. Chairman Hoffman stated that there is no formal LLCs report, but noted that information received from Pamela Connell, AT&T, indicates that negotiations are still ongoing between the LLCs and NeuStar.

I. North American Numbering Plan Billing and Collection (NBANC) Report.

Mary Pat Brennan provided the report to the Council and stated that a FCC order on the revised contribution factor is expected this week approving the true-up revised factor to .000043 versus .000057. The reduced contribution factor will result in refunds to service providers. Refund checks will be mailed in July for over \$1million. The total fund will be reduced from \$15.8 to \$12.3 million dollar. Statements will be sent out to carriers by June 22 and checks will be distributed in July.

Fund Status: The current balance is \$6.4 million; projected receivables for year 3 are \$9.2 million; payments to NeuStar to date total \$1.2 million; payments to NECA total \$72.2K; Board expenses total \$3.5K and payments to an external auditor are projected to be \$22K.

Ms. Brennan stated that the NBANC financial report will be filed with FCC on June 21, 2000.

June 21, 2000

J. Opening remarks. Chairman Hoffman noted that discussion regarding the 2012 exhaust projection ignored other projected exhaust dates and again stated that the projection provided by NeuStar did not include any of the Commission's NRO measures. Bill Adair suggested sending a letter to the FCC emphasizing that the 2012 exhaust date represents a worst case scenario. He expressed concern that the 2012 exhaust date can be misconstrued.

The Chief, Common Carrier Bureau provided a response dated June 20, 2000 to the Alliance for Telecommunications Solutions (ATIS) regarding the INC NANP expansion assumptions. Copies were provided to the Council.

NANC reviewed and approved a letter to the FCC Chief, CCB expressing concerns with the August 1st deadline for reporting utilization and forecast data when the NANPA has not developed an electronic interface.

K. NANP Expansion Option – U S West Presentation. Jack Ott, U S West, provided a comprehensive tutorial on an expansion option which uses 2 digit geographic steering codes (00 through 99). This option would permit customers to retain their existing 10 digit telephone numbers, and the steering code would be added to identify a geographic area (*e.g.*, state). If adopted, this option would delay the commencement of NANP expansion by eliminating the need for "expansion" NPA codes and makes available easily recognizable codes (ERC's) (233, 344, 455, etc.) for assignment. Additionally, this option provides each geographic area with the same capacity as today's NANP, simplifies network routing, which reduces the complexity and costs of network

changes. This option would require the development of a “toll” tone or announcement for use in those areas where an interstate toll indicator is required.

L. Cost Recovery Working Group Report. No formal report was scheduled. Based on information received regarding the affiliation of WG Co-Chair nominee, Elsa Morris (formerly with the Ohio Public Service Commission and now a private consultant), the Council agreed to accept the nomination.

M. NANC Discussion Group on Charging for Telephone Numbers. Dan Gonos, Winstar reviewed the group’s progress with the Council and provided an updated strawman draft for potential submission by the Discussion Group to NANC. The FCC requested comments in the *Further Notice of Proposed Rulemaking* (FNPRM) on a market-based approach to administering numbering resources (paragraphs 250-251). The Council determined that it should gather information on this topic by reviewing the comments filed and any other information available that may better inform the Commission on this issue. The FNPRM comments are due June 30 and replies are due July 7, 2000. Mr. Gonos noted that participants in the Discussion Group are lukewarm to the issue of charging for numbers and are concerned about the concept. A number of concerns have been raised and are summarized in the draft, noting the advantages and disadvantages with charging for numbers. As a result, there are a lot more perceived disadvantages than advantages noted.

With respect to developing a secondary market, the advantages may include the following: (1) It would not require any regulatory commission to charge for numbers or result in any additional governmental revenues; (2) it would provide some gauge of what the clearing price would be for number usage in certain applications; (3) it may allow service providers to purchase numbers in certain areas where they are otherwise unavailable; (4) it may encourage service providers to innovate and develop number sharing applications that are currently not being used, and (5) it may encourage service providers to make use of stranded numbers in certain geographic areas where there would generally be little or no demand.

The disadvantages may include the following: (1) Trading may lessen the incentive to perfect existing regulatory measures in order to achieve ongoing numbering efficiency; (2) the FCC and states are attempting to perfect 1K pooling and other measure in order to optimize numbering efficiency. If carriers were able to effectively obtain numbers through the secondary market, there would be less incentive to improve regulatory measures despite any apparent problems that may arise. (3) The opportunity to “sell” numbers on the secondary market may encourage service providers to inflate requirements in order to “warehouse” numbers and realize an advantage through the secondary market; (4) large service providers could form alliances with smaller competitors or even form “shell” companies for the express purpose of ensuring a continuous supply of “secondary market” numbers, and (5) secondary market pricing, if high enough, could exclude all but the best financed service providers.

Chairman Hoffman commented that other countries charge for numbers and asked whether the Discussion Group considered looking at those experiences. Ron Havens suggested that instead of charging for numbers, the group should consider having a penalty for non-use of numbers -- this would be an incentive for carriers to donate to the pool. Karen Mulberry noted that there is no direction in the FNPRM for NANC to look at this matter.

Chairman Hoffman acknowledged that NANC was not given direction in the FNPRM on this issue, however, commented that perhaps consideration should be given for some type of economic disincentive for unified messaging companies (such as e-fax) whose business plan is based on a free resource. NANC should decide whether to get involved; but as a first step, NANC should examine what is filed with the FCC in the way of comments by others.

Bill Adair stated that charging for numbers and unified messaging consumption of numbers should be viewed as two separate and distinct issues. NANC should evaluate unified messaging to better understand the issue at a "think tank" level and not necessarily by an IMG. Chairman Hoffman added that he had received input from Ed Gould in response to the proposal and suggested that Internet IP addresses could alleviate demand if unified messaging services went to a digital environment. Perhaps NANC should invite Efax to come in and provide a tutorial on this concept. This issue keeps coming up and NANC needs to decide whether to examine it now or later.

David Bench, Nortel Networks, gave a short tutorial regarding the operation of e-fax type services as follows: The company has a device (probably a modified computer) that has phone numbers on the input side and an internet connection on the output side. They offer basic service free of charge to the customer. They sell advertisements to be put on the fax messages; this is how they make their money. It is like an electronic Pennysaver.

The e-fax type company prefers sequential numbers because they pre-program the computer. When they give the end user the fax number, they program their machine with the end user's e-mail address. The company typically requests numbers in rural small exchanges, because large quantities of sequential numbers are usually available. They order business numbers from the service provider (telephone company) and pay foreign exchange rates to have the numbers answered in San Francisco (or wherever they are located). As the machine takes in the fax message, it is supplemented with advertisements and then forwarded to the end user via an Internet connection. The call is sent paid by the person sending the fax. It is then routed to the end user's long distance carrier and then routed to the terminating number. The calls are short in duration and are not very frequent. Rural exchanges usually have an evening busy hour and most of these type calls occur in the business day.

Mr. Bench opined that as a former Traffic Engineer, he considers this process as a free ride because it does not tax the PSTN. The originating phone company is paid for the call, and the terminating telephone number "gets their cut." In addition, the terminating

telephone company is paid business rates for the service and the foreign exchange (FX) charges. Mr. Bench suggests all parties to this process benefit; and notes that the traffic is evenly distributed across the PSTN. It is a point-to-point phone call just like any other normal fax call.

Dan Gonos commented that Efax offered to use rate centers that were rural in nature; this could have an impact on areas that would not otherwise need area code relief. JoAnne Sanford stated that this is not a theoretical problem -- North Carolina is nervous about this and wants to be proactive to decide how to proceed on what is viewed as a potential negative impact on selected consumers. The North Carolina PSC would encourage NANC to take this on as an issue and that it be addressed in a uniform and informed place.

Beth Kistner stated that E-fax is a customer and is not unlike a university or other large user of numbers. There is no reason to treat it differently. The service provider goes to NANPA to get codes to satisfy demand -- no inherent difference. Chairman Hoffman stated that he considers it a non-geographic use of numbers. The issue causes concern where using these resources are being used in areas in an NPA that is in jeopardy. Jo Anne Sanford stated that there are policy issues that need to be addressed, but first we must know more about the service. Lori Messing, CTIA expressed support for using an IMG to begin to look at UMS as a first step in helping states to address the non-traditional use of numbers, and to lay out a framework to understand these issues and look at futuristic applications.

Chairman Hoffman agreed to revise proposed scope of assignment to a possible IMG and recirculated to the NANC members for consideration before the July 18-19, 2000 meeting. Beth Kistner opposed rolling the charging for numbers study group into the UMS issue.

N. Other Business. None.

O. Next Meeting. July 18-19, 2000.

VI. Action Items and Decisions Reached

1. North American Numbering Plan Administration (NANPA) Report. NANPA is authorized to proceed with NANP exhaust projection including pooling based on the assumptions presented at the June meeting, by the September 19-20, NANC meeting.

A list of recommendations provided by the NANPA designed to identify the roles and responsibilities of NeuStar personnel as they relate to NANPA in their participation in industry meetings was referred to the NANPA Oversight Working Group (NOWG) for consideration. The NOWG will report back to NANC at the July 18-19 meeting with its conclusions.

The NOWG will work with NANPA to document and verify conditions stated by NeuStar in addressing the need for adjustment of compensation due to increased volume of central office (CO) code requests. NeuStar has recommended an adjustment and the NOWG will bring a recommendation concerning the proposed adjustment to NANC at the July meeting.

2. NANPA Oversight Working Group. The FCC's Designated Federal Officer (DFO) will advise NANC of priority for the audit requirements document, which was due in July.
3. Numbering Resource Optimization (NRO) Working Group. The NRO WG will draft a NANC transmittal letter to convey the numbering secondary category definitions to the FCC (cc: INC) on completion of task assigned to NANC as outlined in paragraph 14, of the *NRO Order*.

The Pooling IMG will put a placeholder in the Request for Proposal (RFP) for development of a Pooling Administrator requirement to provide a summary pooling status report as an optional item for separate pricing.

NRO WG will continue to develop the pooling trial summary report matrix in the interim (reference to reasonable conditions for obtaining supportable data).

NRO WG will provide a recommendation on fees for telephone number reservation extensions at the September NANC meeting.

NRO WG will provide status on the development of the Numbering Resource Utilization/Forecast (NRUF) Requirements Document at the July meeting with a final report in September.

NANC recommends that service providers should report data to both NANPA and to the pooling administrator in a national pooling environment.

4. Pooling Issue Management Group. IMG will prepare draft letter from Chairman Hoffman to Yog Varma advising that the PA technical requirements will be approved at the July NANC meeting and forwarded to the FCC.
5. NANC Chair to send a letter to Chief, CCB, advising that NANPA will not have a system ready to organize and analyze the numbering utilization and forecast data that is required to be submitted on August 1, 2000.
6. NANC agreed that its meetings would continue on the current 1-1/2 day schedule.
7. A revised Table of NANC projects was developed and is to be distributed to NANC members.
8. Cost Recovery Working Group. Elsa Morris was confirmed as Co-Chair.

9. Unified Messaging Services IMG Proposal. Chairman Hoffman will revise the scope of the proposed IMG assignment and will invite an e-fax representative to make a presentation to NANC. The NANC will make a determination as to establishing an IMG to investigate this topic.