

North American Numbering Council
Meeting Minutes - Final
September 22-23, 1998

I. Time, Date and Place of Meeting: The North American Numbering Council held a meeting, commencing at 8:30 a.m., at the Federal Communications Commission, 1919 M Street, NW, Room 856, Washington, DC, on September 22, 1998. On September 23, 1998, the meeting was held at the Sheraton City Centre, 1143 New Hampshire Avenue, NW, Washington, DC.

II. List of Attendees:

A. Council Members

Voting Members

1. Emily Williams
2. David Konczal
3. Edmund Gould
4. Dan Hochvert
5. Paul Kenefick
6. Dennis Hinkel
7. Ronald Binz
8. Lori Messing
9. Alan Hasselwander
10. Bernard Harris/Ted Noeker
11. Peter Guggina
12. Gerry Thompson
13. Vincent Majkowski/Bruce Armstrong
14. Joanne Sanford/Bridget Szczech
15. David Rolka/Amy Putnam
16. Beth O'Donnell
17. Robert Montgomery/Lawrence Krevor
18. Dan Gonzalez
19. Joe Kingrey
20. Carl Hansen
21. Trent Boaldin
22. Cathy Handley
23. Mike Bennett
24. Hoke Knox
25. Gerry Rosenblatt
26. Paul Hart

Organization

- ALTS
- American Mobile Satellite
- AT&T Corp.
- Bell Atlantic
- Cable & Wireless, Inc.
- CinBell
- Competition Policy Institute
- CTIA
- Frontier
- GTE
- MCI WorldCom
- Mobility Canada
- NARUC
- NARUC
- NARUC
- NCTA
- Nextel Communications, Inc.
- NEXTLINK
- NORTEL
- Omnipoint
- OPASTCO
- PCIA
- SBC Communications, Inc.
- Sprint Corp
- TIA
- USTA

Special Members (non-voting):

- John Manning ATIS
- Ron Conners NANPA

B. Commission Employees

Kris Monteith, Designated Federal Official
Anna Gomez, Acting Chief, Network Services Division (NSD)
Blaise Scinto, Deputy Chief, NSD
Jared Carlson, NSD, CCB
Linda Simms, NSD, CCB
Les Selzer, NSD, CCB
Patrick Forster, NSD, CCB

III. Estimated Public Attendance: Approximately 38 members of the public attended the meeting as observers.

IV. Documents Introduced. Each member received the following handouts:

- (1) Industry Numbering Committee Report, Issue 105 - Number Pooling
- (2) INC Draft 1000 Block Number Pooling Administration Guidelines
- (3) Cost Recovery Working Group Report
- (4) Abbreviated Dialing Ad Hoc Working Group Report Presentation
- (5) Abbreviated Dialing Ad Hoc Working Group Report and Recommendation, September 15, 1998
- (6) Numbering Resource Optimization Working Group (NRO WG) Report
- (7) MCI Worldcom and Ad Hoc Telecommunications Users Committee 1000 Block Pooling Minority Opinion
- (8) Corrected NRO WG Executive Summary
- (9) Corrected NRO WG Recommendation
- (10) LINUS/COCUS Decision Matrix
- (11) NARUC Contribution - COCUS/LINUS Enforcement Recommendation
- (12) Local Number Portability Administration (LNPA) Working Group Report
- (13) Wireline Wireless Integration Sub-Committee Report

V. Summary of the Meeting:

A. Welcoming Remarks. Chairman Hasselwander, Chairman of the Council, provided welcoming remarks, and introduced Yog Varma, Deputy Chief, Common Carrier Bureau.

Mr. Varma stated that he was delighted to be present at the NANC meeting, knows many of the persons present and has enjoyed working with them over the years. Having worked for state commissions for 30 years, Mr. Varma stated that he brings a slightly different perspective to the issues. As he learns more about what is before the NANC, he expressed awe at the work being performed by the NANC, as well as by the FCC. Mr. Varma urged NANC members to look at the issues before them from a public policy point of view, and to put aside any corporate or organizational differences. Mr. Varma stated that he looks forward to receiving the NRO WG report.

Chairman Hasselwander added that the NRO WG would complete the report by the middle of October, so that the NANC could look at the full report at the NANC's October meeting. He

urged the NANC to focus on the substance of the NRO WG report and not to consume a lot of time discussing what the NRO WG did or did not do.

Peter Guggina, MCI WorldCom, stated that he did have one process-related issue, and would raise it at the Steering Group meeting that night.

B. *Approval of Minutes.* The August 20-21, 1998, meeting minutes were approved with minor typographical corrections. Dan Hochvert noted that certain law enforcement issues had not been noted in the conclusion to the meeting minutes. Cathy Handley and Chairman Hasselwander stated that they did not recall coming to a conclusion on this issue. After further discussion, the NANC agreed that it should continue to monitor and revisit this issue.

C. *Industry Numbering Committee (INC) Report.* Jo Gallagher, Bell Atlantic, presented the INC report. She noted that most of the contributions received through the INC LNPA Workshop dealt with inputs to the Thousand Block Pooling Administration Guidelines. Ms. Gallagher summarized the key agreements reached at the recent INC LNPA Workshop meetings (pages 4 and 5 of the handout). In response to a question as to why it takes 66 days to activate a 1000s number block, Ms. Gallagher responded that if a new provider enters a pool, necessitating the addition of NXXs to the pool, 66 days are required to activate the NXX. The requirement that a service provider entering a pool provide a forecast 66 days prior to joining the pool, protects the pool from being depleted of numbers and allows the pooling administrator to add NXX codes to the pool as a result of the addition of service providers to the pool.

Ms. Gallagher stated that forecasts were to be reported on a semi-annual basis, but that the INC have not reached a decision on the specific months for reporting to occur. She stated the INC have not yet reached a decision on this issue, in part, because it seeks input from the NANPA as to what will work best for the administrator.

Chairman Hasselwander noted that the NANC agenda includes a discussion of LINUS, and that Bruce Armstrong had prepared a consolidated recommendation and matrix to examine the differences in the positions of certain NANC members. He noted that some dispute remains between NARUC's position and the position of AirTouch, AT&T, GTE, PrimeCo PCS, and Sprint PCS's comments on the COCUS/LINUS discussion. Chairman Hasselwander requested that, off-line, interested parties discuss the issues and how best to proceed. Ms. Gallagher stated that INC had made no assumptions on the outcome of the COCUS/LINUS discussion.

Ms. Gallagher reviewed section 12 of the guidelines, the audit section. At this point, INC has a place holder there for the audit framework, to be incorporated into the 1000s block assignment guidelines in the future.

Paul Hart, USTA, raised an issue regarding cost recovery. He inquired about the Commission's requirements and the NANPA's ability to develop a statement of work and cost estimates for the work. Ms. Gallagher responded that the INC guidelines substantially define the major pooling administrator requirements. She also noted that Lockheed Martin, the NPAC Administrator, has been in attendance at all INC meetings. Barry Bishop, Lockheed Martin, agreed that Lockheed Martin has been present at the INC meetings and participated where

appropriate. Mr. Bishop confirmed that Lockheed Martin is moving along in getting what it needs to develop the statement of work and the cost estimates for 1000s block assignment.

Peter Guggina, MCI WorldCom, asked when "final edits" to the 1000s Block Number Pooling Assignment Guidelines would occur. Ms. Gallagher stated that the INC has dates reserved for the October, November and December meetings of INC, at which time further work on the guidelines will take place. Final edits to the guidelines are expected to occur at the October meeting of the INC LNPA Workshop. The final document will be completed no later than end of the year, although INC's objective is to complete the required work by the end of October. Ms. Gallagher clarified that INC has reached no agreement to cut things off by end of October.

Peter Guggina, MCI WorldCom, asked whether the final presentation of the NANP expansion report would address the future of the PSTN and the potential convergence of data, voice, and IP protocol. Ms. Gallagher stated that the presentation would reflect what is currently in the draft NANP expansion report, as well as status of work. She did not recall anything specific in the report regarding IP telephony, although Ms. Gallagher believes it may be addressed in a general way.

D. Cost Recovery Working Group Report. Anne La Lena, MCI WorldCom, presented highlights of the Cost Recovery Working Group (CR WG) recommendation for cost allocation of 1000s block administration and pooling. Ms. La Lena stated that the Working Group's review of the Telecommunications Act and FCC opinions led to the conclusion that 1000s block pooling is numbering administration and, therefore, the additional vendor costs of administering 1000s block assignments and pooling should be borne by all carriers. The Working Group recommends that the costs incurred by the NANPA for 1000s block administration and pooling be recovered under the existing NANP formula.

Mike Bennett, SBC, requested clarification on whether Ms. La Lena's comments related to "internal costs" that any carrier would bear to implement pooling. Ms. La Lena responded that the CR WG's recommendations are directed to cost recovery for the vendor administration, not cost recovery for individual carriers. Ms. La Lena also explained that, at present, the LLCs receive change orders for any particular work that must be performed. The LLCs' master contracts allow carriers to process change orders through them. This issue may need to be addressed.

Cathy Handley, PCIA, noted that the CR WG's report notes that, under the current practice, the NBANC determines payments needed for the NANPA on an annual basis. She asked whether discussions have been held with NBANC about a mid-cycle modification. Ms. La Lena stated that no formal discussions have been held, but a heads-up has been given.

Mike Bennett, SBC, noted that his company, like others, is formulating its budget and asked when, at the earliest, ballpark figures for NANPA funding would be available. Ms. La Lena stated that before the NANPA can provide a solid price estimate for NANPA funding, both the 1000s block assignment guidelines, which should be available from the INC by the end of the year, and the "requirements document" or RFP are needed.

NBANC Report. Vince Majkowski provided an update on the NANPA fund. The current fund balance is \$1.1 million. Projected receivables are \$ 1.4 million. Commissioner Majkowski noted that Canada still owes \$116,000, the Dominican Republic \$17,000, and non-compliant carriers owe \$20,000. Total payments to NANPA for the year stand at \$1.65 million, with \$1.65 million in payments remaining for the year. Payments to NECA to date total \$124,000, with \$124,000 remaining to be paid. The total Board expenses to date are \$17,999.

Commissioner Majkowski reported that the NBANC has contacted potentially non-compliant carriers. He noted that, in a parallel process, the FCC issued notices of apparent liability to two carriers for failure to comply with universal service funding requirements. Commissioner Majkowski reported that the NBANC will send a final notification to each carrier on failure to comply, containing the FCC notice in the universal service area, and advising carriers that the list of non-compliant carriers will be forwarded to the FCC for enforcement purposes.

Commissioner Majkowski reported that on August 25, Lincoln Robinson sent a letter to CODETEL regarding outstanding payments of the Dominican Republic. A favorable reply was received and CODETEL volunteered to negotiate payment by the Dominican Republic. Discussions with Canada continue and the Canadian consortium has approved initial payment of \$25,000, to be forwarded to NBANC by the week of September 14. Additionally, the consortium will send correspondence to the NBANC describing the process that will be used to fulfill the remainder of Canada's NANP obligations.

Commissioner Majkowski reported on the NANPA funding process for 1999. He reported that the FCC, by letter, had provided a schedule to begin billing on February 12, 1999. He also reported that the data collection form has been developed. The Board will meet by conference call in October, and will convene a face-to-face meeting in Washington before the November NANC meeting. The contribution factor will be determined at that time. Additionally, the November discussion will debate the "safety factor" to be used for NANPA funding purposes and the handling of overages.

Commissioner Majkowski also reported on concerns raised about the 1998 contributions and the \$100 minimum payment requirement. Commissioner Majkowski reported that the minimum, according to some carriers, constituted a much higher contribution factor than the factor of .00022 multiplied by net revenues. Commissioner Majkowski reported that less than one-third of all carriers contributed at the required .00022 x net revenues rate; the remaining carriers contributed at a higher rate. Commissioner Majkowski noted two possible solutions to this issue: (1) lower the minimum; (2) removed the minimum altogether. Commissioner Majkowski suggested that because of the given size of the fund, a \$5 or \$10 contribution might be more equitable. Commissioner Majkowski stated that the \$100 minimum is not codified by the FCC. Any change would require a recommendation to NANC for referral to the CR WG. Commissioner Majkowski reported that the issue will be discussed in October, and if the NBANC approves a change, it will advise the NANC by letter to refer matter to the CR WG for review.

E. Numbering Resource Optimization (NRO) Working Group Report. Mike Whaley, U S WEST, co-chair of the NRO WG, began the review of the report and its recommendation by thanking all members of NRO for their work on the document. Mr. Whaley reviewed the handout

the NRO WG provided to the NANC members. In reviewing the scope of the NRO, as developed at the May 28, 1998 NRO meeting, Mr. Whaley reported that the NRO WG had worked diligently to meet the September 11 date for submittal of the NRO Report to the NANC, but was unable to meet that deadline. He also stated that the NRO's State Issues Task Force (SITF) had collaborated with several state commissions and noted that Brent Struthers, Illinois, and Elsa Morris, Ohio, performed data collection and analysis on behalf of the Task Force and the NRO. Mr. Whaley then reviewed the structure of the report document, noting that there may be more minority opinions than currently attached to the document, and that portions of the report remain to be completed.

Chairman Hasselwander suggested that the NANC move to the recommendation and executive summary sections. The NANC proceeded with a line-by-line review of the Executive Summary. Regarding the executive summary, Ron Binz, CPI, suggested inserting "and preferences" after "needs" in the first sentence of the second paragraph, stating that he believes the modification captures more clearly the intent of the survey. No NANC member was opposed to this suggestion. Regarding the third paragraph, Mike Whaley noted that it should read as "individual TN pooling," not "porting."

Ron Binz suggested that paragraph three should begin with "The ATF was charged with . . ." Chairman Hasselwander requested that he and Beth O'Donnell, NCTA, work off-line to develop suggested wording. Ms. O'Donnell noted that it also had been suggested that the document be rearranged to discuss the SITF, ITN, and then the ATF portions of the document. With respect to the fourth paragraph, Peter Guggina stated that he believed that ITN also was tasked with developing an 'architecture' for, as well as an analysis of, ITN pooling. Chairman Hasselwander noted no objection to the addition of such language.

In the fifth paragraph, Chairman Hasselwander noted the suggestion to drop the sentence that begins "The NRO-WG will provide a supplemental report..." Consensus was reached on that suggestion. Consensus also reached to delete everything after "12 alternatives" in the following sentence. In the final sentence of the paragraph, consensus was reached to change "supplemental" to "completed."

Trent Boaldin, OPASTCO, stated that NANC should make clear to the NRO and the working groups that no additional work will be done on the portions of the report submitted after the September NANC meeting. Beth O'Donnell noted that some sections of the NRO report will have to be redone when the additional sections are added.

Chairman Hasselwander noted that two questions are before the NANC. One question is whether the NANC will put together a separate document containing the work to be completed by the October NANC meeting. The second question is whether the NANC will re-work all other sections, including ITN and 1000s block pooling. Vince Majkowski, NARUC, agreed that there should be no editing of previously submitted material; rather that the NANC would only submit the supplemental information. Paul Hart, USTA, noted that the NRO did not have any plans to further address 1000s block and ITN pooling. Beth Kistner, MCI WorldCom, noted that the sections to be completed are referenced in the table of contents of the current version of the NRO document.

Peter Guggina suggested that the NANC consider the current document as "Issue 1" and, release a new "Issue 2" version of the document when the additional sections are completed in October. Mr. Guggina noted that only new material would be added to "Issue 2" of the document. Emily Williams, ALTS, stated that she believes it is premature to conclude that no changes will be made in work that has already been performed. Carl Hansen noted that the executive summary and recommendations also may change, and agrees with the "Issue 1/Issue 2" approach. Chairman Hasselwander stated that the next question is whether the NANC recommends that the FCC put the incomplete report out for comment, or whether it recommends that the Commission await receipt of the total report. Following discussion of whether to submit two reports, or to simply update the report that will be forwarded to the FCC on September 23, the NANC reached consensus to follow the "Issue 1/Issue 2" approach.

Following a break for lunch, members of the NANC recognized Chairman Hasselwander for his continuing and committed work as the NANC chairman. The discussion on the executive summary then resumed.

Beth O'Donnell noted that she and others had reordered the summary so that the SITF section is first, followed by the ITN section, and, subsequently, the ATF section. Chairman Hasselwander read the summary as reorganized. Beth Kistner, MCI WorldCom, then stated that it should be noted that, in the first sentence of the paragraph beginning, "The NRO-WG, ATF, and ITNTF attempted . . .", while a qualitative analysis of the benefits of both 1000s block pooling and ITN was performed, a quantitative analysis of the benefits and costs was not. Beth O'Donnell suggested that the NANC alter the sentence to say that no analysis was done, but benefits were assessed. Bernie Harris noted, however, the difference between listing benefits and criteria and an actual analysis leading to a conclusion. Dan Hochvert suggested the following alternative sentence: "The task forces attempted to identify the costs and benefits of number pooling alternatives."

Discussion ensued about the following sentence, stating that the limited content of the responses made it impossible to reach salient conclusions. Chairman Hasselwander suggested that the NANC simply say something such as, "The content of the responses was limited," and end the sentence, and then say, "Conclusions reached were based upon . . ." Dan Hochvert noted that, in fact, although the NRO WG sought cost information, the responses were so limited that it could not draw conclusions. He noted that the NANC could move a little further on the qualitative description of the benefits. Ron Binz stated that he supports reordering the paragraph. Chairman Hasselwander stated that the issue would be taken off-line.

Chairman Hasselwander then directed the discussion to the following paragraph, beginning with "Of the two..." Dan Hochvert suggested that the sentence be revised to read "It should also be noted that *these* implementation *timeframes*...". Consensus was reached to change the sentence. Chairman Hasselwander asked whether, in the first sentence, anyone had a problem with the word "concluded." No objection was raised. Ron Binz suggested that the first sentence be revised to read, "Of the two number pooling alternatives addressed, the NRO-WG concluded . . ." Chairman Hasselwander noted that the NANC concurred with that.

Ron Binz noted the second-to-last sentence of the same paragraph should read, "Some components of the pooling timelines require regulatory guidance including resolution of cost-recovery issues." Commissioner Rolka noted that cost-recovery issues are not always addressed simultaneously with the issuance of regulatory guidance. Mike Bennett stated that SBC feels strongly that cost-recovery must be addressed before pooling is implemented. Dan Hochvert noted that if regulators issue orders requiring pooling, the industry must comply; absent a regulatory mandate, however, he noted that cost recovery is an important motivator. To capture the concern expressed by Mike Bennett, Mr. Hochvert suggest that the importance of the need for regulatory guidance on cost recovery, concurrently with the implementation of number pooling, might be better included in the "Recommendations" to be submitted to the Commission.

NANC then discussed the importance of including the cost recovery point in the Executive Summary. Mike Whaley noted that the cost-recovery topic was deliberated at length at the last NRO-WG meeting. Chairman Hasselwander suggested that the cost-recovery issue be separated from the rest of the sentence that begins "Some components of the . . ." He noted several votes in opposition to dropping, "including resolution of cost recovery issues" from the sentence at issue. Further discussion on the issue followed. Chairman Hasselwander summarized the discussion and sought vote on a proposal to move up the last sentence on last page about the importance of cost recovery. Chairman Hasselwander suggested that the issue be taken off line when consensus was not reached.

The discussion then turned to the paragraph beginning with "The SITF reported . . ." Over an objection from Carl Hansen to the implication that data comes from service providers, Chairman Hasselwander noted that the paragraph would remain as written.

The NANC then moved to the paragraph beginning with "Based on the work . . ." The NANC discussed reordering the document slightly. Following a break, Ron Binz reported the resolution that a group tasked with working the issue of cost recovery. He stated that a proposed solution was to sever the link between cost recovery and timelines. Under one proposed approach, the cost recovery issue would not be addressed in the Executive Summary, but rather in a cover letter to the Commission or in the Recommendation. In accordance with this proposed solution, a period would be placed after "guidance" so that the sentence read, "Some components of the pooling guidelines require regulatory guidance." Alternatively, if the cost recovery point is to be included in the Executive Summary, the sentence in question should convey two notions: (1) that a regulatory order is needed to ensure that timelines are met; (2) that the NANC strongly urges that the regulatory order address cost allocation/recovery. According to Mr. Binz, the alternative approach would avoid the objection that cost recovery must be decided before implementation begins, but recognizes that NANC believes cost recovery is an important issue.

The NANC then addressed the Recommendation section of the NRO-WG report. Chairman Hasselwander began by reading the second paragraph. Beth Kistner, MCI WorldCom, suggested striking the word "optimization" in last sentence of the second paragraph, and replacing it with "implementation," to avoid the implication that 1000s block pooling leads to the optimization of number resources. Dan Hochvert proposed adding "and thus meets the time frame dictated by the Bureau" to the last sentence of this paragraph. Chairman Hasselwander suggested changing the last sentence, so that it states that 1000s block pooling has the greatest potential to meet the time

frame requested by the Bureau. He suggested that the NANC then delete the first sentence of the next paragraph.

Carl Hansen suggested that the last sentence of the third paragraph should read, "LRN-LNP capable" rather than "which have implemented LRN-LNP." Chairman Hasselwander suggested the last sentence be redrafted to read, ". . . and by carriers which have implemented LRN-LNP capability."

WEDNESDAY, SEPTEMBER 23, 1998

Opening remarks. Chairman Hasselwander noted that next month's meeting (October 20-21) will not be at the FCC, but probably at the Sheraton City Centre Hotel.

I. NRO Working Group Report - Continued. Chairman Hasselwander noted that the Executive Summary had been revised to incorporate the changes made by the NANC, with the exception of the conceptual agreement that Ron Binz and others had been working on and the discussion regarding the placement of one paragraph.

Chairman Hasselwander noted that Cathy Handley, PCIA, suggested that the current first paragraph be made the third paragraph of the Executive Summary. Beth O'Donnell suggested that the first sentence of the third paragraph should be the first sentence of the entire Executive Summary. Chairman Hasselwander noted that there was no objection to Ms. O'Donnell's suggestion.

Moving to page two, Carl Hansen then suggested deleting "potential" from the first sentence of the paragraph that begins, "The NRO-WG and its task forces..." and adding "potential" after "although" in the second sentence. Chairman Hasselwander noted that there was no objection to the suggestion. Joe Kingrey, Nortel, proposed to delete the last sentence of the same paragraph, stating that the response rate from vendors was not low. Chairman Hasselwander noted that, alternatively, the Executive Summary could specify which segments of industry had responded. Mr. Kingrey inquired about the vendor response rate. Beth O'Donnell noted that while the ATF did receive responses from vendors, cost information had not been included. She stated that of the ten questionnaires sent to vendors, none of the six responses contained cost information. Chairman Hasselwander asked whether it be consistent to say, "few, if any, conclusions can be drawn from the responses to the questionnaires and are provided for informational purposes only." Following further discussion on the topic, Chairman Hasselwander suggested that the issue be taken off-line.

Returning to the paragraph beginning, "The NRO-WG identified 14 . . .", Ron Binz suggested that the word "optimization" should be changed to "efficiency." Chairman Hasselwander noted that there was no opposition to the suggestion.

The NANC then discussed the paragraph of the Executive Summary regarding the cost/benefit analysis (paragraph beginning "The NRO-WG and its task forces sought to assess potential . . ."). Although NANC was in general agreement that a cost/benefit analysis had not

been addressed by the NRO WG, the NANC could not reach consensus regarding language to suggest that a cost/benefit analysis would be required before a certain number optimization solution could be implemented over another. The NANC agreed that Ron Binz' group addressing the cost recovery issue also should tackle this issue. No further comments on the executive summary were offered.

Chairman Hasselwander moved the discussion back to the draft Recommendation. He stated that the following new language had been proposed for the last sentence of the third paragraph: "The forms of number pooling identified by this WG can only be implemented by carriers that have deployed LRN." Ed Gould, AT&T, suggested revised language to read, "The forms of number pooling ... by carriers that have deployed LRN in areas where LNP is available."

The NANC debated whether the Recommendation should mention that 1000s block pooling is not necessarily the final word in number optimization. Chairman Hasselwander suggested taking the issue off-line.

With regard to the paragraph beginning, "The NRO-WG recognizes there are several other optimization methods that . . .," Chairman Hasselwander noted that the word "supplemental" should be replaced in accordance with the previous day's discussion. Carl Hansen noted that since NANC had committed to providing the additional sections by October, the sentence should read ". . . when the report is complete in October 1998." Consensus was reached on the issue.

Carl Hansen questioned whether there was a need for the last sentence of the paragraph ("There was insufficient time . . ."). Ted Noeker, GTE, stated that the sentence was intended to explain why the NANC is giving an Issue 1 report. Paul Hart suggested such a statement be placed in the cover letter, stating that it is important to have on the record the reason that NANC will be providing two reports to the FCC. Consensus was reached to delete the last sentence.

Chairman Hasselwander then read the second to last paragraph beginning with, "Implementation of . . ." Dan Hochvert noted that the paragraph may be premature, given the upcoming report in October. Consensus was reached to leave this paragraph in the Recommendation.

With regard to the final paragraph (Additional work must be done . . .), Carl Hansen suggested completely eliminating it. The NANC agreed to eliminate the entire paragraph.

Following a break, Chairman Hasselwander noted that Ron Binz's group had suggested changes on the cost issues. With respect to the sentence concerning the response rate to cost questionnaires, the group proposed that the sentence read "Given the low response rate to the *questions* . . .," with the remainder of the sentence remaining as drafted. The NANC agreed to the sentence as rewritten. Regarding the re-ordering of the Recommendation, Chairman Hasselwander suggested that that discussion be deferred until Ron Binz was able to provide a hard copy of the substantive language regarding his group's proposals. Peter Guggina, MCI WorldCom, requested that the transmittal letter to accompany the NRO Report mention the minority opinions attached to the Report. Trent Boaldin, OPASTCO, requested that the

transmittal letter clearly state that the NANC had re-worked much of the NRO's work. Chairman Hasselwander agreed to the suggestions.

Paul Hart then read the action items:

- ! Changes to the Executive Summary and Conclusion were recorded by FCC staff and read by Chairman Hasselwander. The Report will be forwarded to the FCC in September with areas marked where changes are anticipated. The completed report will be forwarded in October. The NRO is to continue work on additional 12 optimization methods; there will be no additional substantive work on 1000s block or ITN for inclusion in the October report. The NRO is to submit an updated report before the October NANC meeting to permit a final report to be forwarded to the FCC in October.

- ! Chairman Hasselwander will provide a cover letter to the report stating conditions and intent, and will acknowledge minority opinions. The letter will acknowledge that the Executive Summary and Recommendations are NANC's and the report is that of the NRO. The report will be forwarded to the FCC before midnight September 23. There will be a final report next month.

Peter Guggina stated that MCI/Worldcom would like to call attention to the fact that the three minority reports attached to the document present significant disagreement with some conclusions and recommendations of the Report. In particular, MCI, the Ad Hoc Users Group, and NASUCA had problems with some of the recommendations. Mr. Guggina stated that MCI supports 1000s block pooling, but not with certain of the caveats reported by NANC. He also noted MCI's view that a path forward to ITN is needed. Furthermore, Mr. Guggina remarked that MCI WorldCom's analysis of the time necessary to implement ITN differed significantly from the four-to-six year estimate provided by the Report.

Mr. Guggina stated the MCI WorldCom did not believe that the NRO-WG Report was competitively neutral, nor did it assure adequate availability of numbering resources. In MCI WorldCom's opinion, the Report fails to address the root cause of poorly utilized NANP resources. In MCI WorldCom's view, 1000s block pooling alone does not address optimization issues. Mr. Guggina further stated that the NANC should focus on ways in which to gain access to unassigned numbers. Finally, Mr. Guggina noted that, in MCI WorldCom's view, the long-term solution of ITN had not been adequately acknowledged in the NRO-WG Report. No discussion ensued on MCI Worldcom's statement.

Ron Binz distributed edits to the Recommendation and the Executive Summary. A brief discussion followed as to whether the NANC should recommend that the FCC initiate a rulemaking proceeding. After polling the NANC, Chairman Hasselwander noted a consensus to accept the Recommendation as edited by Ron Binz's group. With regard to the suggested edits to the last paragraph of the Executive Summary, Mike Bennett suggested that the words "the issue" be changed to "analysis." Chairman Hasselwander noted no opposition.

Following the lunch break and distribution of the most recent drafts of the Recommendation and Executive Summary, Chairman Hasselwander noted that the first paragraph of the

Recommendation should be dropped. Beth O'Donnell similarly noted that the language, "In support of this NRO-WG recommendation," in the last paragraph of first page also should be deleted. Chairman Hasselwander noted that he would be careful when drafting the cover letter to mention the minority opinions filed with the report. Following minor re-wording to the exact titles of the Recommendation and Executive Summary sections of the NRO-WG Report, the discussion of the NRO-WG report concluded.

O. *Steering Group Report.* Chairman Hasselwander reported on the Steering Group meeting, held on September 22, 1998. Chairman Hasselwander reported that the Steering Group reviewed a proposed work plan timeline prepared by Pat Caldwell and Norm Epstein. Following discussion, Chairman Hasselwander reported that the Steering Group had concluded that no costs for 1000s block number administration, including those that the NPACs might bill to the NANPA, would need to be recovered from service providers. The Steering Group also concluded that before the costs of administration could be accurately identified, the 1000s block number administration requirements must be completed, as well as a statement of the requirements for auditing service providers. Chairman Hasselwander stated that the Steering Group had noted that the NRO-WG will complete a requirements document before the NANC meeting in January 1999 and that the NANPA Oversight Working Group will complete the audit requirements by the same date.

Chairman Hasselwander reported that an ad hoc group, consisting of Barry Bishop, Pat Caldwell, Andrea Cooper, Cathy Handley, Anne LaLena and Shawn Murphy, was formed to identify what, if any, additional tasks must to be completed. The Ad Hoc Group will report back to the Steering Group at the October Steering Group Meeting.

Chairman Hasselwander reported that the Steering Group also held a short executive session. During that session, the Steering Group determined to hold a conference call meeting in executive session with the co-chairs of the NRO, to discuss process issues for future NRO activities. The conference call was scheduled for Friday, October 2 at 2:00 PM eastern time. Chairman Hasselwander reported that the Steering Group also agreed to study methods of standardizing NANC reports. Peter Guggina, Paul Hart and Bernie Harris will prepare a proposal for the Steering Group's consideration.

Finally, Chairman Hasselwander reported that the next face-to-face meeting of the Steering Group will be held on Tuesday, October 20 at 6:00 PM in Washington, D.C.

Note: The remainder of the NANC meeting was chaired by Ron Binz, NANC Co-Chair.

J. *Abbreviated Dialing Working Group Final report.* Paul Hart, co-chair, provided an overview of the final report, as detailed on the handout provided to the NANC members. The report was accepted by the full NANC, with one modification. A footnote will be added in Section 12, Conclusions, to address the GSM/international roaming issue. Chairman Hasselwander will draft a cover letter to accompany the transmittal of the Report to the Chief, Common Carrier Bureau.

K. Line Utilization Survey. Bruce Armstrong, NARUC, provided a handout, dated September 18, 1998, to NANC members outlining the NARUC Proposal for Combined Contribution on the NANPA COCUS/LINUS Enforcement Recommendation. Mr. Armstrong also provided a decision matrix that listed the key issues (confidentiality, jurisdiction, resellers, and enforcement) and set forth the original and current positions of NARUC and the AirTouch, AT&T, GTE, PrimeCo PCS, and Sprint PCS, as well as the NARUC compromise position. The AirTouch group also provided a handout on the issue, dated September 23, 1998. Following discussion of the positions of the two groups, Mr. Armstrong agreed to lead a working group to craft a consensus document for consideration by the NANC at its next meeting.

L. Definition of a Reserved Telephone Number. Co-Chairman Binz stated that only Bell Atlantic and AT&T had responded to Chairman Hasselwander's request for contributions on the definition of "reserved telephone number." The NANC agreed that comments and additional contributions should be forwarded to Ed Gould, AT&T. A consolidated view will be prepared and provided for comment at the October NANC meeting for final action.

M. NANPA Oversight Working Group Report. Andrea Cooper, co-chair, provided the NANPA Oversight Working Group report. In accordance with the handout, Ms. Cooper reported that, at its August 20 meeting, the NANPA Oversight WG had continued to work on CO Code Transition Task Force (COCTTF) issues and the development of a performance matrix. Ms. Cooper reported that a non-disclosure agreement had been drafted by the FCC and provided to the WG members for internal review. Ms. Cooper reported that the agreement would be signed by the WG members prior to any review of the Lockheed Martin response to the FCC's requirements document, in response to Lockheed Martin's concerns with the confidentiality of that document. Ms. Cooper also reported that the WG had received a report dated August 28, 1998 from Lockheed Martin, addressing Lockheed Martin's neutrality, in light of the announcement that Lockheed Martin intended to acquire Comsat.

Ms. Cooper announced that the WG would continue its review of the draft performance matrix and discuss the workplan and timeline at its September 24th meeting. Ms. Cooper noted that representatives of Lockheed Martin would attend the meeting and provide an update on the neutrality issue. Finally, Ms. Cooper stated that the NANPA Oversight Working Group would address COCTTF issues and the letter received by the NANC from Massachusetts regarding the NANPA's obligation to conduct numbering optimization studies on behalf of the states.

N. Local Number Portability Administration (LNPA) Working Group Report. Tom Sweeney and Paula Jordan, co-chairs, provided a report on NPAC System and Center Readiness LLC, as detailed in a handout dated September 23, 1998 and provided to the NANC members. They reported that the milestones have been met and will continue to be met. They also reported that Lockheed Martin and the LLCs are currently negotiating the status of Release 2.0 and its release date.

Paula Jordan provided the Wireline/Wireless Integration Subcommittee (WWISC) report. She reported that no date has been decided upon for Release 2.0; it is expected, however, to be released by the end of First Quarter 1999. The schedule for Release 2.0 remains intact

notwithstanding the nine-month extension for wireless number portability implementation granted by the FCC.

Ms. Jordan reported that the LNPA Wireless Subcommittee held its first meeting and elected Julie Prebo, Airtouch, and Anna Miller, BellSouth Cellular, as co-chairs. The WNP Subcommittee also adopted a charter and operating procedures. At the next meeting, the Subcommittee will address wireless testing requirements and E911 provisioning of MDN and MIN in a number portability environment. The group is looking into the length of the day for wireless business hours. The second edition of the Wireless Wireline Integration Report will be emailed to the NANC by December 11, 1998, for final review at the December NANC meeting.

Finally, Ms. Jordan reported on the NPAC System and Center Readiness for Wireless Number Portability as of September 18, 1998. Ms. Jordan reported that no dates had yet been established but that the blanks would be filled in as determined. A question was raised as to whether the group planned to publish the names of wireless companies engaged in testing of number portability, as had been done in the wireline context. Ms. Jordan agreed to bring the suggestion to the WG and to report on the issue to NANC at its next meeting.

O. *Other Business.* No other business was conducted.

V. Action Items and Decisions Reached.

1. NRO Working Group Report. Changes to the Executive Summary and Conclusion were recorded by FCC staff and read by Chairman Hasselwander. The Report will be forwarded to the FCC in September with areas marked where changes are anticipated. The completed report will be forwarded in October. The NRO is to continue work on additional 12 optimization methods; there will be no additional substantive work on 1000s block or ITN for inclusion in the October report. The NRO is to submit an updated report before the October NANC meeting to permit a final report to be forwarded to the FCC in October.

Chairman Hasselwander will provide a cover letter to the report stating conditions and intent, and will acknowledge minority opinions. The letter will acknowledge that the Executive Summary and Recommendations are NANC's and the report is that of the NRO. The report will be forwarded to the FCC before midnight September 23. There will be a final report next month.

2. Abbreviated Dialing Report. Report accepted. A footnote will be added to Section 12, conclusions, to address the GSM/International roaming issue.
3. LINUS/COCUS Enforcement. Bruce Armstrong will lead a working group to craft consensus document comparable in complexity to that addressed at the September meeting on LINUS/COCUS enforcement.
4. Reserved Telephone Numbers Definition. Relative to Bell Atlantic/AT&T contribution. Provide comments/contributions to Ed Gould, AT&T. A consolidated view will be provided for comment at the October NANC meeting for final action.

5. LNPA Working Group Report. Request for addition of carrier identification of readiness for wireless portability. Paula Jordan will take request back for consideration.