



## **NANP Administration Services**

### **Scope of Work Change Proposal #1**

**INC Issue 692: Update the 5YY Requirements  
For Resources and  
INC Issue 702: Update Service Description  
For Use of 5YY Resources**

September 24, 2012

## Table of Contents

1	Introduction .....	1
1.1	Purpose and Scope.....	1
1.2	Modification of Guidelines.....	1
2	Proposed Industry Numbering Committee (INC) Scope of Work Change .....	2
3	Neustar’s Proposed Solution .....	4
4	Assumptions and Risks.....	7
5	Cost Assumptions and Summary.....	8
6	Conclusion.....	9

# 1 Introduction

## 1.1 Purpose and Scope

In accordance with Neustar’s contract<sup>1</sup> and our constant effort to provide the best support and value to both the Federal Communications Commission (FCC) and the telecommunications industry, Neustar, as the North American Numbering Plan Administrator (NANPA), hereby submits this scope of work change to the FCC for approval. This scope of work change is in compliance with NANPA’s Change Management protocol and per requirements as outlined in the NANPA Contract FCC12C0023, Section H.4 (Technical and System Changes), Item 5, which states the following:

“If and when a change to the NANPA system is adopted by the NANC or the INC, the contractor’s liaison shall ensure that the proposed change is forwarded to the Contracting Officer and the Contracting Officer’s Representative (COR). No change shall be binding until such modification is issued, nor shall the Government be liable for any costs associated with a system change until such modification is issued.”

## 1.2 Modification of Guidelines

Pursuant to NeuStar’s contract, the NANPA shall participate in the development and modification of guidelines and procedures, which may affect the performance of the NANPA functions. These changes may be derived from regulatory directives and/or modifications to guidelines. In addition, new guidelines may be developed as appropriate to comply with regulatory directives. The NANPA shall adopt and implement any changes that are consistent with regulatory directives after they are officially adopted, recognizing that some may constitute a change in the scope of work.<sup>2</sup>

When the Industry Numbering Committee (INC) places any changes to its guidelines in initial closure, the NANPA shall submit an assessment regarding the impact of scope of work, time and costs to the INC, the North American Numbering Council (NANC) and the FCC within 30 days.<sup>3</sup>

This document provides detailed information pertaining to the INC’s requirement that went to initial closure on August 24, 2012. This change order document covers the required subject matters such as explaining the industry’s requirements, proposed solution, costs, risks and assumptions.

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<sup>1</sup> Contract Number FCC12C0023 and the NANPA Technical Requirements Document, Attachment A, effective July 9, 2012.

<sup>2</sup> NANPA Technical Requirements Document, July 2012, Section 2.10, Modification of Guidelines.

<sup>3</sup> NANPA Technical Requirements Document, July 2012, Section 2.10, Modification of Guidelines.

## 2 Proposed Industry Numbering Committee (INC) Scope of Work Change

During the August 14-16, 2012 INC meeting, INC Issues 692 and 702 were resolved and went to Initial Closure on August 24, 2012. INC Issue 692 affects the NANP Administration System (NAS).

- **INC Issue 692: Update the 5YY Requirements For Resources**

The official INC issue statement is copied in its entirety below and can also be found on the ATIS website:

**A) *ISSUE STATEMENT***

The demand for 5YY numbers has increased substantially over the past few years as demonstrated by the implementation of the 533 NPA in September 2009 and the anticipated introduction of the 544 NPA in 2011. The current PCS 5YY NXX Code Assignment Guidelines should be reviewed and updated to ensure NANPA and 5YY applicants have a clear understanding of the criteria necessary to obtain these numbers. This review should focus on three primary areas:

1. Current guidelines require the applicant to provide a service description that ensures two of the following three criteria are met: personal mobility, terminal mobility and service profile management. Ensuring an initial application meets these criteria often requires significant, detailed discussions between NANPA and the applicant and can be time-consuming for both entities. Of unique interest is the issue of service profile management and what is needed to meet this requirement. INC needs to revisit this definition to determine what changes are needed to more accurately reflect today's communication environment and provide additional definition and clarity concerning the proper use of this non-geographic resource.
2. For initial code requests, the guidelines permit applicants to request as many resources as they desire, based upon a 12 month forecast that substantiates the quantity requested. No maximum is placed upon the quantity of initial codes assigned. Such assignment criteria could potentially lead to the assignment of resources that are not properly utilized. As such, the guidelines should be modified to establish a maximum number of codes that may be included in an initial code request.

Applicants for additional 5YY NXX codes need to demonstrate that they will exhaust their supply of 5YY resources in six months. Other than this criterion, the guidelines contain no other benchmarks to help ensure efficient utilization of assigned resources. The INC should examine the requirement for additional resource applicants to meet a minimum utilization threshold for existing 5YY resources and/or require a threshold for currently assigned 5YY NXX codes to be in-service as a pre-requisite for the assignment of additional 5YY NXX codes.

**B) FOLLOWING RESOLUTION FROM INC**

INC placed Issue 692 – Update the 5YY Requirements for Resources - into initial closure on August 24, 2012, with the following language:

Due to emerging technologies and the broader use of this numbering resource today, INC modified these Guidelines to harmonize them with existing FCC regulations and other INC guidelines. These modifications include:

- Identifying the appropriate regulatory authority for reclamation
- Requiring that applicants provide documentation to NANPA to demonstrate authority to provide service
- Introducing a 75% utilization requirement for additional resources
- Requiring SPs to demonstrate six months to exhaust data for additional resources

Also, under Issue 702, INC changed the service description for this resource and renamed the Personal Communications Services (PCS) 5YY NXX Code Assignment Guidelines as the Non-Geographic 5XX-NXX Code Assignment Guidelines.

Implementation of this resolution will be delayed until the outcome of a NANPA change order is known.

• **INC Issue 702: Update Service Description for Use of 5YY Resources**

The official INC issue statement is copied in its entirety below and can also be found on the ATIS website:

**A) ISSUE STATEMENT**

The current service description for 5YY resources may limit their use to a more narrow application than is needed in today's marketplace. INC should consider revising or expanding the service description for 5YY resources to include emerging technologies such as machine-to-machine or other non-geographic applications to ensure efficient use of NANP resources. INC should also consider designating a new resource for these emerging technologies instead. If INC determines that revisions to the service description for 5YY resources are warranted, INC should also consider revising the name of the 5YY Guidelines to eliminate any confusion with PCS wireless licensing. INC also should address what authorizations applicants need (such as a license or CPCN) before NANPA can assign 5YY resources to the applicant.

**B) FOLLOWING RESOLUTION FROM INC**

INC placed Issue 702 – Update the 5YY Requirements for Resources - into initial closure on August 24, 2012, with the following language:

INC agreed not to designate a new NANP resource and instead revised the service description for the 5YY resources to include emerging technologies. In Issue 703, INC set aside several NPAs for PCS use (521, 523, 524 525, 526, 527,528, 529, 532, 538, 542, 545, 547, 549, 552, 553, 554, 556, 569, 578, AND 589). Since these NPAs were not ERCs from the 5YY series, INC agreed to re-title the Personal Communication Services (PCS) 5YY NXX Code Assignment Guidelines as

the “Non-Geographic 5XX-NXX Code Assignment Guidelines.” INC addressed licensing requirements by requiring applicants to provide documentation to NANPA to demonstrate authority to provide service. (See also Issue 692.) Text changes were made to the Guidelines.

Implementation of this resolution will be delayed until the outcome of a NANPA change order is known.

### **3 Neustar’s Proposed Solution**

NAS modifications will be necessary to implement the changes required with INC Issue 692. The majority of these modifications will model functionality currently available with central office codes from geographic area codes. The summary below describes the NAS functionality that will be applied to non-geographic 5XX-NXX resources.

#### 5XX-NXX Applications and Processing Changes

- When initiating a 5XX-NXX application, NAS will request basic information from the applicant such as the non-geographic 5XX NPA the user desires resources, the Operating Company Number (OCN) from the user’s profile that will be associated with the 5XX-NXX code(s), and the type of request (initial, growth, return or change). Drop-down menus will be displayed when making these selections.
- Company and contact information required on all 5XX-NXX applicants will be driven by the user’s profile.
- A user must have a 5XX-NXX NRUF on file in order to submit an initial or growth code application. Modifications to this validation check are required to address non-US NANP member country applicants for 5XX-NXX resources.
- Any initial or growth code application that includes an OCN that appears on the FCC’s Red Light list will be identified by NAS for appropriate processing by NANPA.
- For initial applications:
  - NAS will be updated with business rules to allow a user applying for initial 5XX-NXX code(s) to request a maximum of 25 codes on a single application.
  - For initial requests of ten or more codes, NAS will present a notice that the applicant must provide a letter from the customer/agent demonstrating the need for these 5XX-NXXs.
  - The user will enter a 12-month telephone number forecast. NAS will ensure the first six months’ forecast substantiates the need for the amount of initial 5XX-NXXs requested. If not, NAS will provide appropriate notification and directions to the applicant.
  - NAS will provide a notification that an initial request for 5XX-NXX resources must be accompanied with documented proof that shows the applicant is authorized to receive NANP resources directly from the NANPA (e.g., authorized local exchange carrier or wireless carrier). This information will be sent separately to NANPA via email.
- For growth applications:
  - NAS will permit an applicant to submit a growth request for multiple quantities of 5XX-NXX codes.

- NAS will calculate the average monthly TN demand, the Months-to-Exhaust and current utilization rate based upon data submitted by the applicant as part of the request.
- NAS will apply validation checks to the submitted data and provide appropriate feedback/directions to the applicant.
- For 5XX-NXX code returns:
  - NAS will permit up to 25 5XX-NXX codes to be included on a return application.
  - NAS will ensure the codes being returned are associated with an OCN that appears in the applicant’s NAS profile. Appropriate notification will be provided if a 5XX-NXX code(s) being returned is not associated with an OCN in the user’s profile.
- For 5XX-NXX code changes:
  - NAS will permit applicants to submit applications to change the OCN in the event of a merger/acquisition or the 5XX-NXX resource is to be transferred to another entity.
  - Other code changes will be required to provide an explanation for the change.
- NAS will permit the user to submit a Part C (Confirmation of 5XX-NXX Code in Service) for multiple 5XX-NXX codes in a single submission.
  - NAS will pre-populate certain information on the Part C based upon the 5XX-NXX codes entered into the system.
  - NAS will ensure any 5XX-NXX code identified on the Part C form is assigned to an OCN in the user’s profile.

#### NANPA Application Processing

- NAS will automatically email the Part B (5XX-NXX Code Assignment Confirmation Form) to Traffic Routing Administration for all approved applications.
- NAS will be capable of accepting and processing 5XX-NXX mass modifications for OCN changes, assuming a minimum of 50 5XX-NXX codes, using an Excel spreadsheet containing the following information: name of entity requesting code requesting information change, contact information (item 2 on the Part A, including OCN), 5XX-NXX affected and reason for change.

#### Reclamation

- A 5XX-NXX Part C Reminder email will be sent if the Part C is not received within 5 months from the date of assignment. If the applicant’s NAS profile is disabled, NAS will identify those NAS users with the OCN appearing on the application and “Other Resources” included in their profile and send the reminder email to them.
- A 5XX-NXX Part C Delinquency email will be sent if the Part C is not received within 6 months from the date of assignment. If the applicant’s NAS profile is disabled, NAS will identify those NAS users with the OCN appearing on the application and “Other Resources” included in their profile and send the delinquency notification to them.
- NAS will prohibit a user from submitting a Part C if the 5XX-NXX code is in delinquent status.
- NAS will create a monthly list of 5XX-NXX codes that are in delinquent status. This list of delinquent codes will be emailed by NANPA to the appropriate FCC contact. “Delinquent”

status of a 5XX-NXX code is when no Part C has been submitted within six (6) months of the assignment date of the 5XX-NXX code.

- NAS functionality will be added to permit the 5XX-NXX Administrator to accept a delinquent Part C if directed to do so by the FCC.

#### Additional Queries Available for NAS Users

- In addition to the “Search for 5XX-NXX Forms” presently available in NAS, a new query called “Search 5XX-NXXs Needing Part Cs” will be introduced. The query permits the user to search for a 5XX-NXX assignment for which no Part C has been submitted by the assignee.

#### NRUF Queries and Reports

The following NAS NRUF queries and reports will be introduced in NAS for the 5XX-NXX resource:

- 5XX NPA Utilization Missing Report - This report permits the NAS user to identify those 5XX-NXX resources assigned to it for which no utilization has been reported. The report will be created by taking a snapshot of 5XX-NXX assignment data as of June 30 and December 31. Internal NAS and US Federal Regulator users will have access to all 5XX-NXX utilization missing. Service provider and service provider consultants will only be permitted to view data associated with the OCNs in their NAS profile.
- NRUF Missing Utilization Notifications - For those 5XX-NXX codes in which no utilization data was submitted, yet the service provider assigned the code did submit utilization data for other assigned non-geographic resources, NAS will generate an email notification, informing the service provider of the missing utilization. This email notification will be sent to the contact identified on the company information page of the NRUF Form 502. The email will identify the specific 5XX-NXX codes that no utilization was provided and direct the service provider to submit this data.
- Anomalous Notifications - For those assigned 5XX-NXX codes for which no utilization was submitted, and the service provider (identified by the OCN) did not file any utilization or forecast data via the NRUF reporting process, NAS will generate an email notification to be sent to those active NAS registered users that have the OCN of the assigned 5XX-NXX codes in their NAS profile, informing the recipient of the missing utilization. If no active NAS registered users can be found, NAS will create an internal report to be used by NANPA to assist in identifying and contacting other possible individuals associated with the service provider that failed to submit the utilization data for the 5XX-NXX codes in question.
- NRUF Database - The NRUF database provided by NANPA to the FCC will be modified to include missing utilization for 5XX-NXX codes.



## Public Website Reports

The following 5XX-NXX reports will be introduced in NAS. These reports will replace the currently available reports on the website.

- 5XX NXX Available Codes Report - This report lists the available codes in each of the 5XX NPA codes. The report is updated real-time. The user can select a specific 5XX NPA or all of the 5XX NPAs from a drop-down box and the list of available codes is presented.
- 5XX NXX Utilized Codes Report - This report lists the utilized codes (assigned or unavailable for assignment) in each of the 5XX NPA codes. The report is updated real-time. The user can select a specific 5XX NPA or all of the 5XX NPAs from a drop-down box and the list of utilized codes in the selected 5XX NPA is presented.
- 5XX NXX Code Assignment Records - This report provides an updated listing of assigned, available and unavailable 5XX-NXX codes by 5XX NPA in a downloadable zipped text file and Excel 2007 format. The report will be updated daily.
- 5XX NXX Aging Report - This report provides a list of aging 5XX NXX codes. These codes are currently not assignable in accordance with industry guidelines. Typically, this report identify 5XX-NXX codes that have been returned or reclaimed, and must remain unavailable for assignment for 45 days following the date of their return/reclamation. The report will be updated daily.

## **4 Assumptions and Risks**

As part of the NANPA's assessment of this change order, NANPA is required to identify the associated assumptions and risks that can have an impact on its operations.

Assumptions:

- Supporting documentation required for initial 5XX-NXX resources (i.e., evidence of authorization to provide service) must be sent to NANPA via email at the same time the application is submitted in NAS. Otherwise, the application will be denied.
- Supporting documentation to be provided to NANPA must be current and active. If the certification issued by a State Regulatory Body, or the FCC license has been terminated or revoked, NANPA will deny the application.
- Supporting documentation to be provided to NANPA must be associated with the applicant. In the case that the name associated with the supporting documentation does not match the service provider's name on the application, NANPA will deny the application, unless the applicant can provide documentation linking the name on the application with the name on the certification/license documentation.
- NANPA will continue to have up to ten business days to process a 5XX-NXX application.

- There will be no daily/weekly/monthly Part A or Part C reports. The FCC will receive assignment/denial/return information via the monthly reports currently provided to them by NANPA.
- NAS will permit users to submit growth applications that fail to meet industry guideline requirements for months-to-exhaust and/or utilization in order for the applicant to receive a denial. The applicant may use this denial if it chooses to appeal NANPA's decision to the appropriate regulatory authority.
- Contact information (i.e., specific individual's name and phone number) associated with each assigned 5XX-NXX code that is presently available on the NANPA website will be removed. NANPA will only identify the entity to which the 5XX-NXX code is assigned via the OCN and the name associated with that OCN that was assigned by NECA.
- If approved, implementation of this change order will occur after the NAS technical refresh approved by the FCC in the current NANPA contract. This refresh is scheduled for completion in April 2013.

#### Risks:

- The widening of the scope of allowed uses of the 5XX-NXX resource associated with the resolution of Issue 702 may impact the demand and thus the exhaust of this NANP resource.
- Applicants for 5XX-NXX resources will no longer be required to describe in the application the service for which the resource will be used. As such, NANPA will have to rely on the applicant to certify that assigned 5XX-NXX resources are being used in accordance with the purpose described in the *Non-Geographic 5XX-NXX Code Assignment Guidelines*.
- Since the 5XX-NXX resource may be assigned in any of the NANP member countries, incorporating business rules and logic in NAS to account for any unique local regulatory requirements would prove extremely difficult and costly. Further, such requirements may not be known or even developed at this time. As a result, NAS must be programmed with the flexibility to account for this situation, impacting the validation capabilities engineered in the system.

## 5 Cost Assumptions and Summary

The proposed solution for implementation of the INC Issues 692 and 702 require significant changes to NAS 5XX-NXX resource processing, resource reclamation, NRUF queries and reports and public website reports. NANPA has determined that the cost associated with implementing this change in NAS is \$115,416.00

## **6 Conclusion**

Neustar, as the NANPA, hereby seeks the FCC’s approval for this Scope of Work Change. Upon approval by the FCC, NANPA will notify the industry that it is accommodating this Scope of Work change order.