



**NANP Administration Services**  
**Scope of Work Change Proposal #3**  
**NANP Administration System (NAS) NRUF Updates**

September 22, 2015

## Table of Contents

|     |  |   |
|-----|--|---|
| 1   | Introduction .....                       | 1 |
| 1.1 | Purpose and Scope.....                   | 1 |
| 1.2 | Modification of NANPA Scope of Work..... | 1 |
| 2   | Proposed Scope of Work Change .....      | 2 |
| 3   | Neustar’s Proposed Solution .....        | 2 |
| 4   | Assumptions and Risks.....               | 3 |
| 5   | Cost Assumptions and Summary.....        | 4 |
| 6   | Conclusion.....                          | 4 |

# 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 NANPA Scope of Work

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>

On June 18, 2015, the FCC released the Report and Order concerning Direct Access to Numbers by Interconnected Voice over Internet Protocol (VoIP) providers. In this Report and Order, interconnected VoIP providers are permitted to apply for and receive numbering resources directly from the Numbering Administrators. Per 47 C.F.R. § 52.15(f), all carriers that receive telephone numbers from the Numbering Administrators must file Numbering Resource Utilization/Forecast (NRUF) reports semiannually of their current inventory of telephone numbers.

Current NRUF forms require modification in order for authorized interconnected VoIP providers to accurately submit utilization and forecast data to NANPA.

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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.

## 2 Proposed Scope of Work Change

In accordance with the North American Numbering Plan Administration Technical Requirements Document, dated March 2012, NANPA is responsible for the collection and reporting of utilization and forecast data, known as NRUF Reporting. Service providers are required to report utilization and forecast data twice a year to NANPA. Utilization data includes the quantity of assigned, intermediate, aging, administrative and reserved numbers. Forecast data typically is comprised of a five-year forecast of the quantity of thousands-blocks and/or codes by rate center. The FCC also requires access to disaggregated NRUF data by state regulatory commissions for heightened reporting enforcement, including the responsibility to withhold numbering resources from service providers that fail to file utilization and forecast reports.

NANPA collects, sorts and stores NRUF data submitted by service providers. Data may be submitted via NAS (online), email (i.e., Excel™ workbook), Electronic File Transfer (EFT), compact disk or paper. Along with collecting this information, NANPA provides to the FCC and states online access to service-provider specific and aggregated utilization and forecast data. In addition, state reports containing NRUF information are offered to those states that desire a snapshot of utilization and forecast data for the area codes within their respective states.

In order for interconnected VoIP providers to accurately identify themselves when submitting utilization and forecast data, the NRUF Form 502 requires modification. Further, downstream NRUF reports available to the FCC, states and service providers must be updated to show the service type of “interconnected VoIP.”

With these required changes, the opportunity exists to transition the Excel™ Form 502 workbook from the current .xls file format to an updated .xlsx and .xlsm format. In addition, per a previous FCC request, NANPA proposes to change the reference to the “Version Date” included in the Excel™ workbook to “Edition Date” and well as remove the expiration date.

## 3 Neustar’s Proposed Solution

NANPA proposes to make the following changes to the NRUF submission alternatives as well as to NAS itself. Note that these changes apply to both the geographic and non-geographic NRUF Form 502.

Excel™ Form 502

- Inclusion of “Interconnected VoIP” in the drop-down menu for SP Service Type on the Company Information page.
- Change the field name for Parent Company OCN(s) to Parent Company OCN since only one OCN may be entered in this field.
- Remove the Expiration Date on the following pages: Cover, Home, Company Info and Main Menu.
- Update the Instructions page under Company Information to note that the Parent Company Name, Email and Parent Company OCN are required fields.
- Remove the “Version Date” and include an “Edition Date” in the format Month/Year (i.e., August 2015) on the following pages: Cover, Home, Company Info and Main Menu.

#### FTP

- Inclusion of “Interconnected VoIP” for SP Service Type in the FTP file format.

#### NRUF Online

- Inclusion of “Interconnected VoIP” in the drop-down menu for SP Service Type on the Company Information page for the “Create” and “Modify/Delete” forms available in the system.

#### NAS

- Accept the new SP Service Type of “Interconnected VoIP” included on the NRUF submission alternatives.
- Properly display the new SP Service Type on the appropriate geographic and non-geographic NRUF reports (i.e., OCN Report for Forecast and OCN Report for Utilization).
- Modify the FCC and state NRUF databases provided by NANPA to include the new SP Service Type.
- Remove internal NAS validations that check the Excel™ Form 502 Version Date and Expiration Date and add a new validation for Edition Date.
- Update the online Geographic and Non-Geographic instructions to note that the Parent Company Name, Email, and Parent Company OCN are required fields.

NANPA will make available for download on its website the Excel™ Form 502 in an .xlsm format. This format, along with the .xlsx file, will be accepted by the system. Any other version types (e.g., .xls) will be rejected. Further, NRUF reports available in the system will be downloadable only in the .xlsx format. The capability to download in .xls format will be eliminated.

## 4 Assumptions and Risks

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

#### Assumptions:

- The NANPA website will be updated with the Excel™ Form 502 workbook in the .xlsm version. This version enables the user buttons (e.g., Go to the Main Menu, Check the Data Before Submitting) contained within the Excel™ workbook to work properly.
- The format of the FTP file and the Excel™ spreadsheet will remain the same. No changes will be made to any of the data fields other than the addition of “Interconnected VoIP” for the SP Service Type.
- NAS NRUF User Guides and NRUF Job Aids will be updated to reflect the changes to the submission methods. Directions will be provided on how to save to an .xlsx or .xlsm file. Further, appropriate notification will be distributed via the NANP Notification System (NNS) concerning these modifications as well as the acceptable Excel™ file formats.

Risks:

- Service providers that have used the .xls version of the Excel™ workbook will need to update the file to the .xlsx or .xlsm formats. Many service providers are already using these formats. Those users submitting NRUF that do not have a later version of the Excel™ software (Excel™ 2007 or later) may be unable to submit their NRUF data using the workbook.
- NAS users that wish to download NRUF reports must be capable of accepting .xlsx file formats (i.e., must have Excel™ 2007 or later).

## **5 Cost Assumptions and Summary**

The proposed solution for NRUF submissions requires changes to the NRUF submission methods and NAS. NANPA has determined that the cost associated with implementing these change is \$31,447.68.

## **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.