



# **NANP Administration Services**

## **Scope of Work Change Proposal #5**

INC Issue 788: 555 Line Number Assignments and Reclamation

August 22, 2016

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# 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>

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 submitted on July 28, 2016. This change order document covers the required subject matters such as explaining the industry’s requirements, proposed solution, costs and risk 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 Scope of Work Change

During the July 27-28, 2016 INC meeting, INC Issue 788 was resolved and went to Initial Closure on July 28, 2016. This issue affects the NANP Administration System (“NAS”).

- **INC Issue 788: 555 Line Number Assignments and Reclamation**

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

**A) ISSUE STATEMENT**

The 555 NXX Assignment Guidelines were created in 1994 (INC Issue 005 Assignment of 5XX Line Number Assignments Resolution Date: 4/29/94). As stated in Section 1 of the guidelines, the intended use of 555 numbers is for the provisioning of information services but may include a broad range of existing and future services as well. Initial assignment of these resources started in July 1994 and since then, nearly 8,000 national and non-national 555 line numbers have been assigned. As of January 1, 2015, NANPA had received an in-service confirmation form for less than 100 numbers, the last form dated March 2002. 116 numbers remain in dispute.

In August 2001, the INC modified the 555 NXX Assignment Guidelines (INC Issue 186) to require NANPA to request authorization to reclaim a 555 line number from the appropriate regulatory authority (i.e., the FCC in the U.S.) if the number was not placed in service within 12 months of the assignment date. Further, it removed the INC from any role in the reclamation process. NANPA has followed this process and recovered/reclaimed over 220 555 line numbers since 2002.

Based upon the following information/observations, NANPA believes it is appropriate for INC to revisit the need for this resource and examine potential modifications to the guidelines to better manage 555 line numbers:

1. Over the last 20 years, NANPA has assigned over 8,000 555 line numbers. NANPA has received in-service confirmation form for less than 100 numbers (1% of the assigned resource).
2. The vast majority of 555 line number assignments are to individuals. NANPA has found over the years in discussions with assignees that many of these individuals were either unaware or forgotten that they had requested and received an assignment.
3. NANPA contacted or attempted to contact U.S. assignees that filed an in-service confirmation to seek additional verification that the resource is working on the PSTN. Responses to NANPA's inquiries varied (e.g., disconnected phone number, phone number assigned to a different party, left message with no return call, discussion with assignee with agreement to follow-up but assignee has yet to respond to follow-up calls, assignee is deceased, recognition the numbers were not in service but stated they will retain them, return of five 555 line numbers).
4. Through our interactions with applicants, NANPA believes that certain parties used the guidelines in an attempt to control as many 555 line numbers as possible in the hope that the resource would one day be of value (e.g., for use as a vanity number).

5. As the guidelines did not address how these numbers would be placed in service, it was up to the assignee to work with telecommunications service providers to implement an arrangement where calls to these numbers could be routed and billed. The INC did create the 555 Technical Service Interconnection Agreements (NIIF 0012 ATIS 0300077) to assist assignees with implementation of the 555 number. However, NANPA is unaware of any local (non-national) or wide-spread (national) use 555 line numbers.
6. Assignees encountering technical issues when attempting to place the 555 line number in service were permitted per the guidelines to notify NANPA of these issues in order to seek an extension of the 12 month in-service requirement. Although NANPA did initially receive notification from a few assignees, we have not seen such notifications over the past several years.
7. The 555 line number reclamation process requires NANPA to contact the assignee regarding the alleged non-use or misuse of the 555 number. If direct contact cannot be made, a registered letter must be sent. If the letter is returned as non-delivered, the administrator is to seek direction from the appropriate regulatory authority (i.e., the FCC). Note that for these assignments, NANPA only has a mailing address and phone number (email addresses were not requested on the assignment application). With over 8,000 assignments, following this process would be cumbersome and time-consuming for both NANPA and the regulatory authority. Further, without modification to the current guidelines, 555 numbers would continue to be assigned without any appropriate controls regarding implementation. In other words, the events associated with this resource over the last 20 years would be allowed to continue into the future.

**B) FOLLOWING RESOLUTION FROM INC**

The intended use for 555 numbers included the "provisioning of information services but may include a broad range of existing and future services as well." However, after 22 years and with only one assigned number currently in service and the existing use of 555-1212 still grandfathered, INC determined that the purpose for which this resource was intended has been accommodated by other information/communication technologies and demand for the resource has declined significantly.

Therefore, INC agreed to create the 555 NXX Line Number Reference Document (ATIS-0300115), sunset the 555 NXX Assignment Guidelines (ATIS-0300048), and notify the FCC of its decision.

All 555 line numbers have been returned to the inventory of NANPA resources, with the exception of the 56 line numbers pending regulatory direction to reclaim and the following 555 line numbers, which will remain in use:

- 555-1212 Directory Assistance National use
- 555-4334 Assigned National use

The fictitious non-working numbers, 555-0100 through 555-0199, will remain reserved for entertainment/advertising.

NANPA will submit a Change Order to the FCC to modify NAS to remove the ability for a NAS registered user to access the 555 application (555 Part A) and in-service certification (555 Part C) forms as well as the Search 555 Forms function. NANPA will retain the capability to access these functions.

Upon approval of the Change Order, the 555 NXX Reference Document (ATIS-0300115) will be posted on NANPA website as well as on the ATIS Website under INC Reference Documents. NANPA will also publish a Planning Letter announcing the sunset of the 555 NXX Assignment Guidelines and the 555 resource.

### **3 Neustar’s Proposed Solution**

INC Issue 788 proposes changes to the 555 NXX resource application forms found in NAS. These changes include the following:

- Removal of the 555 NXX Part A application form and 555 NXX Part C in-service certification form for external NAS registered users within the “Other” resource subscription in NAS.
- Removal of the Search 555 NXX functionality for external NAS registered users within the “Other” resource subscription in NAS.
- Removal of the real-time 555 NXX Assignment Report available on the NANPA website.
- Inclusion of the INC 555 NXX Reference Document on the public NANPA website.

### **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:

- NANPA staff will continue to have access to the NAS 555 application and in-service certification forms and the NAS Search 555 NXX capability.
- With the removal of the ability for the external NAS registered user to submit a 555 application form, if a NAS user currently assigned one of the fifty-six 555 line numbers desires to return the resource, NANPA will, if necessary, complete the appropriate 555 Part A form in the system on behalf of the applicant at no charge.
- If/when NANPA receives direction concerning the 56 assigned 555 line numbers that have been referred to the FCC for reclamation,<sup>4</sup> NANPA will make the appropriate updates in NAS and the 555 NXX line number assignment records. Further, the INC 555 NXX Reference Document also will be revised as appropriate.

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<sup>4</sup> Letter dated May 31, 2016 from John Manning, Sr. Director, NANPA to Marilyn Jones, FCC Wireline Competition Bureau.

- As noted in the 555 NXX Reference Document, with the sunset of the INC 555 NXX Assignment Guidelines (ATIS-0300048) and final closure of INC Issue 788, all unassigned 555 line numbers, to include the one hundred sixteen 555 numbers in dispute, will be returned to the inventory of NANP resources.
- Upon receiving written FCC approval of this change order, Amendment/Modification No. M006 to the NANPA Contract FCC12C0023 (NANPA Change Order 2 – INC Issue 794: Update 555 NXX Assignment Guidelines to Reflect a Moratorium on New Assignments), dated June 15, 2015, will be superseded with the sunset of the 555 NXX Assignment Guidelines.
- Upon receiving written FCC approval of this change order, NANPA will publish a NANPA Planning Letter announcing the sunset of the 555 NXX Assignment Guidelines and the status of the 555 NXX resource. Modifications proposed to NAS as outlined in Section 3 above will be scheduled for implementation as soon as possible.
- In addition to the inclusion of the 555 NXX Reference Document on the NANPA public website, other references to the 555 NXX line number resource on the website will be updated to reflect the sunset of the 555 NXX Assignment Guidelines and the status of the 555 resource.

Risks:

- If the fifty-six 555 line numbers referred to the FCC for reclamation are permitted to remain assigned, NANPA (and the 555 line number assignee) will have no industry-approved assignment guidelines that address the administration and management of this NANP resource.

## **5 Cost Assumptions and Summary**

The proposed solution for implementation of the INC Issue 788 requires minimal changes to both NAS and NANPA operations. As such, there is no cost associated with this change order.

## **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.