



North American Numbering Plan Administrator

Contract #FCC19C0001

Change Order Proposal B

(INC Issue 878 Request the INC to permit the assignment of 5XX-N11 codes, excluding the assignment of 5XX-911 in the Non-Geographic Code 5XX-NXX Assignment Guidelines)

September 10, 2019

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1 Introduction

1.1 Purpose and Scope

In accordance with the terms of the North American Numbering Plan Administration contract, Somos, Inc., as the North American Numbering Plan Administrator (NANPA), hereby submits this change order proposal to the FCC. ¹

This scope of work change is in compliance with NANPA’s Change Management protocol and per requirements as outlined in the NANPA Contract FCC19C0001, 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 the NANPA 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.²

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.³

This document provides detailed information pertaining to the INC’s requirement submitted on August 23, 2019. This change order document covers the required subject matters such as explaining the industry’s requirements, proposed solution, costs and risk and assumptions.

¹ FCC Contract for NANP Administration, Contract No. FCC19C0001, dated November 1, 2018

² NANPA Technical Requirements Document, Section 2.10, Modification of Guidelines

³ NANPA Technical Requirements Document, Section 2.10, Modification of Guidelines

2 Proposed Scope of Work Change

During the August 14-15, 2019 INC meeting, INC Issue 878 was resolved and went to Initial Closure on August 23, 2019. This issue affects the NANP Administration System (“NAS”).

- **INC Issue 878: Request the INC to permit the assignment of 5XX-N11 codes, excluding the assignment of 5XX-911 in the Non-Geographic Code 5XX-NXX Assignment Guidelines**

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

A) ISSUE STATEMENT

On 11/28/18 Sprint received the Part 3 for the assignment of 35 5XXs. Included within this assignment was the range of 523-200 thru 523-212 excluding 523-211. On 3/22/19 Sprint added this range of 523-NXXs into our inventory system. During the addition of these 523-NXXs, an error was made and 523-211 was added into the Sprint inventory system. Since the addition of 523-211 into our system on 3/22/19, it is now 99.6% utilized with all resources in 523-211 being assigned to fleet trucking devices that are not able to be reprogrammed after provisioning and shipped.

Since the 5XX NPA NXXs are not dialable, the assignment of N11 codes; with the exclusion of 911, should not bare any hardships for the industry if the INC decides to allow this exception request and allow Sprint to retain the 523-211 since it is nearly 100% utilized.

Section 4.7.2 of the Guidelines states that the remaining 5XX-N11 codes will be reserved pending a decision by the industry, and this situation has presented the opportunity for the industry to make the decision to release these codes to be available for assignment.

Suggested Solution:

Have the INC authorize the assignment of all 5XX-N11 codes, excluding 5XX-911 and allow Sprint to retain this NPA NXX that is 99.6% utilized by our customer. This will also require a text update to Section 4.7.2 of the Non-Geographic Code 5XX-NXX Assignment Guidelines.

B) FOLLOWING RESOLUTION FROM INC

INC agreed to the following edits to ATIS-0300052, Non-Geographic Code 5XX-NXX Assignment Guidelines: to make 5XX-N11 codes, except 5XX-911, available for assignment as contained in INC-2019-00075R001. This Issue will remain in Initial Pending until the NANPA Change Order is approved and implemented in the NANP Administration Plan System (NAS). A corresponding Issue will be brought to the Common Interest Group on Routing and Rating (CIGRR).

3 Proposed Solution

INC Issue 878 proposes changes to the Non-Geographic Code 5XX-NXX Assignment Guidelines to allow assignment of all 32 designated/reserved non-geographic 5XX NPAs

(i.e., 5XX-N11 codes), with the exclusion 5XX-911. These changes include the following:

Removal of the restriction in NAS from assignment of future 5XX-N11 (excluding 5XX-911) and the following N11-NXXs for existing 5XX codes (500, 521, 522, 523, 524, 533, 544, 566, 577, 588):

- 211
- 311
- 411
- 511
- 611
- 711
- 811

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 will commence with assignment of assignment of the N11 codes if requested, on Non-Geographic 5XX-NXX Part A, if requested by a qualified applicant.

Upon receiving written FCC approval of this change order, NANPA will send a NANP Notification System email announcing the availability of the N11 codes for assignment as Non-Geographic 5XX-NXX codes.

Risks:

NANPA did not identify any risks associated with this change order. The N11 Central Office Codes are not assigned due to potential conflicts with routing to the three-digit dialed codes, but the 5XX NXXs are not dialable, so there will be no dialing conflict risk with the commencement of N11 assignments from the Non Geographic NPAs.

5 Cost Assumptions and Summary

The proposed solution for implementation of the INC Issue 878 requires minimal changes to both NAS and NANPA operations. As such, there is no cost associated with this change order.

6 Conclusion

NANPA 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.