



The State Scene

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Texas approves reclamation rules

On August 23, the Public Utility Commission of Texas (PUCT) approved new procedures for the reclamation on numbering resources. The new rules apply to both central office codes and thousand blocks. According to the new rules, carriers must apply to the PUCT for code or block activation extensions. Extensions of no more than 90 days may be granted pending the receipt of an explanation of need from the carrier. The commission may instruct the NANPA or Pooling Administrator to reclaim a resource if it has been assigned, but: 1) is no longer in use by the assignee; 2) to a service that is no longer offered; 3) not in service within the required six-month period; or 4) not used in conformance with industry guidelines. The new rules should help to standardize the reclamation procedures for the state of Texas. (Project 25224)

Florida Staff recommends against rate center consolidation

Citing the success of number pooling, and the

minimal effect of rate center consolidation on the exhaust of the North American Numbering Plan (NANP), Florida Staff told their commission that they should not move forward with any rate center consolidation plans at this time. Their recommendations were approved by the Commission at an open meeting on July 9, 2000 (Docket 010963-TP).

Qwest completes rate center consolidation in Arizona

Qwest completed efforts to consolidate 24 rates centers located throughout Arizona into 8. The rate center consolidation included collapsing five rate centers in the capitol city of Flagstaff into one. While rate center consolidation was being considered in the territories of a number of independent LECs in Arizona, no action has yet been taken in those areas. Verizon was slated to complete a 2-to-1 consolidation of its rate centers in the Parker Dam area in Southwest Arizona by the end of August.

NANPA offers new Part 3 report

State commissions hoping to follow up on Part 1s, in which carriers request central office codes, can now request Part 3 reports be sent to them. The Part 3 is the reply from NANPA back to the requesting carrier advising them of the disposition of their code request. Possible dispositions are assigned, denied, or suspended. While more than 20 states have been receiving the Part 1 report notifying them when a carrier requests a code in their state, a number of states were interested in a report telling what happened to that request. To assist the states, NANPA created a Part 3 report,

which, like the Part 1 report, is available on a daily, weekly, or monthly basis. States wishing to sign up for this new report should send an email to brent.struthers@neustar.biz requesting the report. They should include the names and email addresses of those to whom they want the report sent, as well as a note on how often they want to receive the report, i.e. daily, weekly, or monthly. The Part 3 report is being made available following a brief one-month trial in which three states participated, helping to evaluate the new report. The trial states generally found the information very useful.

California to look into third-party PIC

In Pacific Bell's 271 proceeding in California, two separate draft Orders have been released for comment, one by the presiding Administrative Law Judge (ALJ), another by the presiding Commissioner. One thing both drafts have in common is the requirement of CPUC Staff to investigate the feasibility of neutral, third-party PIC administration.

During the proceeding, IXCs argued that Pacific Bell could no longer play the role of a neutral PIC administrator once it entered the long distance market. AT&T stated, "This means that when Pacific enters the long-distance market, it has control of the customers' vital telecommunications records, and the interexchange carriers have to trust Pacific to not only execute the carrier switches in an unbiased manner, which is the PIC change, the resultant possibility of PIC disputes, but also exchange information in an unbiased manner." The Draft Order states that there were no assurances made by PacBell that it would take measures to ensure its neutrality.

The Order also compared PIC administration to the administration of the NANP. Prior to the 1996 Telecommunications Act, NANP administration was handled primarily by the RBOCs in each region. However, the Act recognized the inherent conflicts related to having a single entity administer crucial numbering resources to CLEC competitors as well as compete for customers against those same CLECs. NeuStar is now in its fifth year as the neutral NANP administrator.

If the Draft Order is accepted in its current form, CPUC Staff must investigate the "efficacy, feasibility, structural implementation, and selection criteria for selecting a competitively neutral third-party PIC administrator for California." The Staff Report will be due five months after the effective date of the Order. NeuStar filed comments in the proceeding expressing its willingness to act as the neutral PIC administrator should the Commission decide to follow that path.

NPA relief petitions being rescinded, dismissed

According to recent changes made to the Industry Numbering Committee (INC) NPA relief Guidelines, NANPA may now notify state commissions and industry when an area code is no longer in need of near-term relief. Until recently, NANPA had never had authority to notify parties of the lack of need for relief once a petition for relief has been filed with a state commission. Because the petition is filed by NANPA on behalf of the industry, NANPA still does not have the authority to withdraw the petition on its own. However, NANPA can send notice to the regulators and industry that a petition may be rescinded where the exhaust date for an area code has moved sufficiently into the future.

Specifically, the new guidelines state that NANPA may provide this notice when it has determined that an area code will not exhaust within five years, but only if the regulator has not already approved a plan of relief and the area code is not considered in jeopardy. Once requested by the state commission or the industry to withdraw a relief plan, NANPA must convene a conference call to gain consensus among the industry members on withdrawal of the petition.

In step with these new guidelines and the recently updated NPA exhaust forecasts, NANPA sent letters to five states (Maine, New York, Rhode Island, South Carolina, and Texas) notifying them of the possibility of rescinding petitions for relief. Of those states, New York, South Carolina, and Texas were notified for multiple area codes.

Three states decided not to wait for letters from NANPA and, based on the recent forecasts, dismissed relief proceedings on their own. Massachusetts, Washington, and Virginia all dismissed relief petitions for NPAs in their states following the release of the new NPA exhaust forecasts. Meanwhile, the New Mexico Commission was informed by NANPA that the industry had reached consensus to take the 505 NPA out of jeopardy. "With the economy causing a slowdown in the telecommunications industry and the spread of number pooling and other optimization measures, code assignments are down and returns are up. Extended NPA exhaust dates are one result," said NeuStar's John Manning. While new forecasts are not due until mid 2003, NANPA continually monitors activity in each area code for necessary exhaust date changes.

FCC delays wireless LNP one year, Verizon, CTIA challenge in court

On July 26, the FCC voted to delay the implementation of wireless local number portability (LNP) for one year, until November 24, 2003. While Verizon Wireless had requested forbearance of the LNP requirement, the Commission found “that wireless LNP is necessary to preserve consumer choice and enhance competition among CMRS carriers and between the wireless and wireline industries.”

After November 23, 2003, wireless carriers in the top 100 Metropolitan Statistical Areas (MSA) must be able to port numbers with other wireless providers and wireline providers. However, the November LNP requirement is not automatic. No company need implement LNP unless it has received a request to do so from another carrier. For a carrier to have a competitor implement LNP in November 2003, they must make a request of

that competitor by February 2003, giving the competitor a full nine months notice. After November, the timeframes between request and implementation range from 30 to 180 days. For carriers outside the top 100 MSAs, the period from request to implementation is six months.

On August 19, Verizon Wireless and the Cellular Telecommunications and Internet Association (CTIA) filed a petition with the DC Circuit of the US Court of Appeals requesting the court to vacate the FCC’s Order. Verizon Wireless and CTIA argue that the FCC’s ruling violates Section 10 of the Communications Act. Section 10 outlines the necessary findings for the FCC to forbear from a regulatory requirement. The timeline for resolution of this petition is not yet clear.

NPAC data center to relocate

The National Portability Administration Center’s (NPAC) primary data center will be relocated from Chicago, Illinois to Sterling, Virginia. The transition, which began in August and will continue until July 2003, is part of an ongoing effort to consolidate NeuStar’s technical and operations staff in Sterling.

The decision follows approval of a detailed transition plan submitted to and approved by the North American Portability Management LLC

(NAPM) and the Canadian Consortium, LNP Consortium.

As part of the relocation, NeuStar will open a new disaster recovery data center in Charlotte, North Carolina. The decision to have Charlotte serve as a backup site was based on the quality of the facilities, as well as ease of access, security, and cost considerations. The new facility will open in August 2002 with full operations in place by the end of September 2002.

State commissions looking into bankruptcies

Both the Missouri and the Nebraska PSCs opened proceedings to investigate the effects of local telecom carriers filing for bankruptcy. The Missouri Commission has ordered WorldCom, along with a number of its subsidiaries, to provide them information on the status of their bankruptcy proceedings and the effect of the bankruptcy on Missouri consumers and other carriers. The Nebraska Commission is “concerned about potential service cut-offs, proper customer notice, and customer migration in the event that a large carrier is unable to fulfill its service obligations.” It is requesting comments on what its role should be in cases of bankruptcies.

Bankruptcies can be of particular concern in the area of numbering. Although telephone numbers, according to INC guidelines, are not supposed to be

sold, bartered, or traded, their relative scarcity gives them a high perceived value. This may prompt bankruptcy courts to assign monetary value to the numbers assigned to a bankrupt company and hold them as assets. Alternatively, where a carrier goes out of business and gives up their numbers, customers who have ported away from that carrier may experience interruptions if the prefix is not reassigned to another carrier. In some instances, it is difficult to locate a company willing to accept a prefix, especially where a large number of prefixes have been made available by a carrier going out of business. While there are many important issues related to carriers going bankrupt, the reassignment of numbering resources is often overlooked. However, if a customer’s service is to continue unabated, it often must be addressed.

State scene spotlight

You may have seen the NARUC name on comments, pleadings, or legal briefs at the FCC or Supreme Court. Perhaps you have experienced first hand how NARUC can affect congressional legislation. But what and who is NARUC? NARUC is the National Association of Regulatory Utility Commissioners, an association of public utility commissioners from the 50 states, DC, Puerto Rico, and the Virgin Islands. Supporting the commission is a small, but very effective staff who provide information to the commissioners on energy, water, and telecom issues, set up meetings and conferences, file comments, draft ex parte notices, and lobby members of Congress. Jessica Zufolo works her legislative magic for NARUC as its legislative director for telecom issues. In this role, she manages and directs legislative strategy and policy for NARUC's membership. She is also the person charged with opening the doors to key congressional committees and leadership offices for state commissions.

Prior to joining NARUC, Zufolo's work address was on Capitol Hill where she spent six years serving Senator Daniel Patrick Moynihan (NY), then Rep. Charles E. Schumer (NY), and Rep. Peter A. Defazio (OR). Working primarily on telecom issues, she drafted consumer protection legislation, including measures addressing telephone slamming, competition policy, cable television rates, and consumer privacy.

Zufolo has been very active on and off the Capitol Hill numbering issues. Zufolo organized several congressional staff briefings on a broad range of numbering issues. Zufolo states her purpose behind the briefings is, "to educate Congressional members from almost every congressional district on the critical nature of these issues." NARUC hosted its first Capitol Hill staff briefing on area code exhaust issues three years ago. Approximately 65 congressional staffers from House and Senate offices attended.

Since then, NARUC, guided by Zufolo, organized another well-attended briefing on area codes and other numbering issues. "The briefing focused on



what states are doing to help customers keep their area codes and phone numbers through number conservation and local number portability." Zufolo quickly adds, "Our goal is to keep these important numbering issues fresh on people's minds on the Hill."

NARUC, with the backing of 50 plus regulatory commissions and structural support of key staff like Jessica Zufolo, is very effective in delivering its state messages on key public policy issues.

In her spare time, Zufolo enjoys swimming and theater. She is an avid swimmer and is on the Master's swim team at the National Capital Y. Originally from New York City, she also enjoys plays, concerts and art openings.

The next issue of the State Scene will feature Zufolo's colleague, NARUC General Counsel, James Bradford Ramsay.

NeuStar introduces LSR clearinghouse service

In response to the many difficulties confronting carriers when trying to interface for the purpose of exchanging local service records, NeuStar has introduced a new service simplifying the process for many CLECs. The service is called LSRexpress and will be launched by NeuStar sometime in September 2002.

LSRexpress is being offered as a more efficient option for CLECs to submit service orders to the ILEC. Currently, CLECs must choose between manual interface methods like fax, ILEC graphical user interfaces (GUIs), and deploying their own Gateway Software System. NeuStar numbers show that CLECs employing manual methods face up to an 80% rework effort because of incomplete orders. CLECs relying on the ILEC GUI or their own Gateway systems see only a 50% success rate on order delivery.

These types of order fail rates lead directly to customer dissatisfaction, and often find their way to state PUCs in the form of consumer complaints. LSRexpress allows CLECs to seamlessly connect to

many carriers through a single connection. As opposed to connecting to each carrier, they will connect to NeuStar's LSRexpress and automatically have an interface to every other carrier connected to LSRexpress. Benefits cited by NeuStar include:

- Enabling CLEC launches into new markets without costly up-front investments;
- Shortening of ILEC install intervals;
- Lowering provisioning costs with electronic order flow through;
- Eliminating of errors and dual data entry;
- Measuring performance of trading partners and internal resources; and
- Outsourcing ILEC change management.

This new service offering compliments NeuStar's Care Clearinghouse which now has more than 500 carriers connecting to it.



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Industry meeting schedule

Wireless Number Portability Operations (WNPO)

Baltimore, MD	September 16 – 17
Denver, CO	October 14 – 15
Atlanta, GA	November 11 – 12
Las Vegas, NV	December 9-10

Local Number Portability Administration Working Group (LNPA WG)

Baltimore	September 17 – 19
Denver, CO	October 15 – 17
Atlanta, GA	November 12 – 14
Las Vegas, NV	December 10-12

Industry Numbering Committee (INC)

Providence, RI	September 9 – 13
Washington, DC	November 4 – 8

North American Numbering Council (NANC)

Washington, DC	September 24 – 25
Washington, DC	November 19 – 20

October bi-monthly conference call schedule

Thurs., October 24, 10 a.m. (CST)

Central Region — AL, AR, IA, IL, IN, KY, LA, MI, MN, MO, MS, TN, TX, WI

Thurs., October 24, 11 a.m. (PST)

Western Region — AK, AZ, CA, CNMI, CO, Guam, HI, ID, KS, MT, ND, NE, NM, NV, OK, OR, SD, UT, WA, WY

Fri., October 25, 11 a.m. (EST)

Eastern Region — CT, DC, DE, GA, FL, MA, MD, ME, NC, NH, NJ, NY, OH, PA, PR, RI, SC, USVI, VA, VT, WV