

National Pooling Administration

Contract #CON07000005

Change Order Proposal #14

(INC Issue #656– Update TBPAG Expedite Process for Thousands-
Blocks (Section 8.6))

January 15, 2010

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1 Introduction

1.1 Purpose and Scope

In accordance with Neustar's National Pooling Administration contract¹ and our constant effort to provide the best support and value to both the FCC and the telecommunications industry, Neustar, as the National Pooling Administrator (PA), hereby submits this change order proposal to the Federal Communications Commission (FCC) for approval. This change order complies with the contractual requirements set forth in Clause C.1 of the *Contract for Pooling Administration Services for the Federal Communications Commission*, effective August 15, 2007, which reads as follows at Section 2.5.4:

2.5.4 Modifications of Guidelines

The PA shall participate in the development and modification of guidelines and procedures, which may or may not affect the performance of the PA functions. These changes may come from regulatory directives and/or industry-initiated modifications to guidelines. In addition, new guidelines may be developed as appropriate to comply with regulatory directives. The PA shall implement any changes determined to be consistent with regulatory directives.

The PA shall:

- Provide, in real time, technical guidance to ensure processes and procedures are effective in meeting the goals of the change.
- Provide issues and contributions, and be prepared to discuss at INC meetings how the proposed change promotes numbering policy and/or benefits the NANP and how the change will affect the PA's duties, obligations and accountability.
- Assess and share in real time (i.e., during discussion) the cost implications and administrative impact of the change upon the PA's duties and responsibilities in sufficient detail as needed by the INC.

When the INC places any changes to its guidelines in final closure, the PA shall submit an assessment regarding the impact of scope of work, time and costs to the INC, the NANC and the FCC within 15 calendar days. The PA shall post changes in procedures on its web site prior to the change taking effect.

Specifically, the PA shall:

- Notify all interested parties when guidelines have changed.
- Interpret guideline changes and impact upon processes.
- Identify implementation date or effective date.
- Provide notification of new forms or tools that may be required.
- Identify a Single Point of Contact (SPOC) within the PA to answer questions.

The NANC shall be consulted at the FCC's discretion regarding the suggested implementation date to determine the likely impact on service provider processes and

¹ FCC Contract Number CON07000005

systems (i.e., whether it would be unduly burdensome or would unfairly disadvantage any service provider or group of service providers per the PA's obligations and NANP administrative principles). The PA shall also seek input on implementation dates from service providers that log in to PAS and vendors that interface with PAS.

2 Issue Statement

The issue statement for INC Issue 656 -- *Update TBPAG Expedite Process for Thousands-Blocks (Section 8.6)* suggested changing the expedite time period for block modifications where the block holder is not the LERG assignee and no NPAC updates are required. However, in its final resolution of the issue, the INC has modified the expedite process for all block modifications and all block disconnects, as contained in the *Thousands-Block Pooling Administration Guidelines (TBPAG)*. The modifications change the earliest possible effective date a service provider may receive for a block modification or a block disconnect from eight business days to nine calendar days from the date the PA processes the request. Therefore, the Pooling Administration System (PAS) will need to be updated to accommodate this change.

The INC issue statement is reproduced below.

INC Issue Statement:

The current expedite process is the same for new block requests, block modification requests and block disconnect requests. In all cases, to request a nine calendar day effective date, the block holder must be the LERG Assignee and no NPAC updates required. However, there are some block modification requests where the block holder is not the LERG assignee and no NPAC updates are required. If an SP requests a block modification and *Part 1B* is not selected as the type of change or *Part 1B* is selected and NPAC updates are not required (NPAC updated via SOA or other method and only PAS is being updated) an SP may want the option to request a nine calendar day effective date.

3 Industry Numbering Committee (INC) Resolution

On January 8, 2010, the INC placed Issue 656 – *Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)* into final closure, with the following language:

Resolution from INC:

The following text changes were made to the TBPAG Section 8.6:

8.6 Expedite Process for Thousands-Block(s)

An SP request for an expedited thousands-block allocation, modification, or disconnect will occur on an exception basis. The following procedures enable an SP to request expedited treatment for an allocation, modification, or disconnect of a thousands-block(s). The expedite procedures below do not eliminate the Block Holder and PA responsibilities described in Section 8.5.

- a) An SP may submit a Part 1A and/or Part 1B request to the PA requesting an expedited allocation, modification, or disconnect of a thousands-block(s).
- b) The requesting SP will indicate on the Thousands-Block Application Forms – Part 1A that this is an expedited request with its desired Effective Date.
- c) The PA will process the application if the request meets the criteria for the allocation, modification, or disconnect of the thousands-block(s) and will make every effort to process the application in fewer than the current maximum seven calendar days. The PA will expedite such requests when it can do so without failing to meet its seven -calendar day application processing interval for other SPs. The PA will determine the minimum Effective Date for an expedited request based upon the following considerations:
 - 1) In the case of a new block request, if the thousands-block applicant is the LERG Assignee Code Holder of the pooled NXX, and no NPAC notification is required, the Effective Date must be at least nine **calendar** days after the issuance of the Part 3. This allows for the PA and AOCN to update BIRRDs for LERG Routing Guide daily updates. The AOCN must agree to perform the BIRRDs update in two **calendar** days rather than the usual five **calendar** days.
 - 2) In the case of a new block request, if the thousands-block applicant is not the LERG Assignee Code Holder of the pooled NXX, ~~the thousands-block requires NPAC notification,~~ the Effective Date will be no earlier than eight **business** days after the issuance of the Part 3: three **business** days to build the thousand-s-block in the NPAC and five **business** days for a potential first 'port' notification. The AOCN must agree to perform the BIRRDs update in two **calendar** days rather than the standard seven **calendar** days.
 - 3) In the case of a block modification or disconnect, the Effective Date must be at least nine **calendar** days after the issuance of the Part 3. This allows for the PA and AOCN to update BIRRDs for LERG Routing Guide daily updates. The AOCN must agree to perform the BIRRDs update in two **calendar** days rather than the usual five **calendar** days. This also allows three **business** days for the NPAC to modify or disconnect the thousands-block.
- d) As soon as all NPAC processing and notifications have occurred, the SP will activate the thousands-block and can begin customer assignments from a new thousands-block.

NOTE: SPs requesting expedited treatment of thousands-block(s) should be aware that there may be -potential impacts to other SPs and customers. This may affect customer service to the extent that an SP is unable to identify the SP to whom a thousands-block has been assigned when responding to a customer trouble report.

4 The Proposed Solution

The National Pooling Administrator has determined that the above-stated amendments to the TBPAG will require the following modifications to PAS.

Pooling Administration System Updates:

PAS will be updated for block modification and block disconnect requests to allow an earliest possible effective date of nine calendar days from the date the PA processes the request. The change will require updates in PAS to the effective date validation process for block modifications and block disconnect requests where *Requested Expedited Treatment* is marked as *Yes* on the application.

5 Assumptions and Risks

Part of the Pooling Administrator's assessment of this change order is to identify the associated assumptions and consider the risks that can have an impact on our operations.

This change order affects only the system and not our day- to-day operations.

6 Cost

In developing this proposal, we considered the costs associated with implementing the proposed solution, including the resources required to complete discrete milestones on a timeline for implementation. The timeline includes preparation, development, testing, proper documentation updates, monitoring, and execution of the solution.

The cost of modifying the system to conform to the changes to the TBPAG will be \$.

7 Conclusion

This change order proposal presents a viable solution that addresses the amendments to the TBPAG and is consistent with the terms of our contract. We respectfully request that the FCC review and approve this change order.