

National Pooling  
Administration

2009

Annual  
Report

neustar™



March 30, 2010

Ms. Joyce Terry-Butler  
Contracting Officer  
FCC Contracts and Purchasing Center  
445 12th Street S.W.  
Washington, D.C. 20554  
RE: Contract Number CON07000005

Dear Ms. Terry-Butler:

Attached please find the *Thousands-Block Pooling Administration 2009 Annual Report*, submitted pursuant to Contract Data Requirements List referenced in Section 4.6.1 of the *Contract for Pooling Administration Services for the Federal Communications Commission*, FCC Contract No. CON07000005 (Contract). This report covers Pooling Administration (PA) activities from January 1, 2009 through December 31, 2009, and is required by Clause C.1 of the Contract. Section 4, *Contract Data Requirements List*, specifically Section 4.6.1, *Annual*, directs that this report contain:

- A brief description of the PA,
- Highlights/significant milestones reached during previous year,
- Identification of existing and potential pooling areas,
- Aggregated total number by pool of the service providers participating in the pooled areas,
- Forecast results, as well as a review of past forecasts vs. actual block activation,
- System and performance metrics,
- The status of required transferable property,
- Industry issue identification/feedback
- The volume of reports produced aggregated by regulatory agency, NANC, NANPA, and service providers, and
- Additional informational offerings.

The annual report specifies how we continued our extraordinary level of customer service in 2009. Timely and accurate customer application processing, flawless Pooling Administration System performance, thorough reporting compliance, no formal complaints, and our unparalleled focus on customer support all add up to outstanding performance.

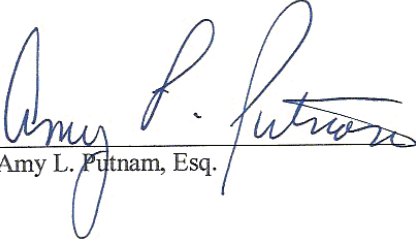
The PA met or exceeded all of its performance goals and objectives in 2009. The goals, most of which are expressed in the contract, include:

- System availability of 99.9% or better;
- 100% of received calls answered within one business day;
- 97% of applications processed within seven calendar days;
- Unscheduled maintenance of the PAS to be less than 9 hours in any 12 month period;
- Scheduled maintenance of the PAS to be less than 24 hours in any 12 month period;
- 100% of the ad hoc report requests to be distributed within three business days;
- All required reports completed in a timely manner;
- Change Orders related to changes in the INC Guidelines to be submitted to the FCC and NOWG within 15 working days
- Strong customer focus;
- Zero formal complaints.

During the past year we continued to accurately and efficiently manage thousands-block number pooling services in a neutral manner that not only meets our contractual obligations, but continues to justify the confidence that the FCC and industry have placed in us. As we have since 2001, we will continue to work cooperatively and productively with you, service providers, industry groups, and regulatory staff throughout our contract term.

Should you have any questions about this report, please do not hesitate to contact me.

Respectfully submitted,



Amy L. Putnam, Esq.

Sr. Director, Pooling Administration  
NeuStar, Inc. (Neustar)

Cc: Ann Stevens, Esq., FCC  
Marilyn Jones, Esq., FCC  
Gary Remondino, COTR, FCC  
Michael O'Connor, NeuStar



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## Section 1 - Description of Neustar Pooling Administration

### 1.1. Background

In 1997, the Illinois Commerce Commission selected Neustar, Inc. [then an autonomous business unit known as Communications Industry Services (CIS) within Lockheed Martin Corporation] to administer the trial of thousands-block number pooling in the Illinois 847 Numbering Plan Area (NPA). This trial, the first of its kind, was successfully implemented in June, 1998 and was backed by the Federal Communications Commission (FCC) in its *Memorandum Opinion and Order and Order on Reconsideration, CC 96-98, FCC 98-224*, known as “the *Pennsylvania Order*.” In the *Pennsylvania Order*, the FCC granted limited authority to continue the Illinois pooling trial and encouraged other states to seek delegated authority to implement pooling trials. Shortly thereafter, Neustar began administering the trial in New York’s 212 NPA.

On November 30, 1999, NeuStar, Inc. (Neustar) was divested from Lockheed Martin as a separate, privately-held company. As more states requested and received delegated authority to implement thousands-block pooling trials, Neustar was chosen as administrator in all but six states where trials were ordered. By the beginning of national pooling, in March, 2002, Neustar was managing twenty-two state pooling trials in eighty-three NPAs and transitioned over five thousand blocks to our then-newly-designed Pooling Administration System (PAS).

Neustar competitively bid for and was awarded the first federal contract to administer the national rollout and ongoing

administration of thousands-block pooling on June 15, 2001, for a total of five years, renewable annually. Contract number CON01000016 expired on June 14, 2006. By the end of that contract Neustar was managing nearly 14,000 rate area pools in all fifty states, the District of Columbia and Puerto Rico.

The FCC issued eight contract modifications between June 15, 2006 and July 12, 2007 to extend Neustar’s pooling administration contract through August 14, 2007. Neustar again competitively bid for and was awarded the second national pooling contract on July 31, 2007, for a possible total of five years, with a base period of two years and renewable annually for the remaining three. Contract number CON07000005 became effective on August 15, 2007.

### 1.2 Neutrality

Neustar Pooling Administration (PA) is an independent, neutral third party, as defined in Section H.3.B, *Conflict of Interest and Neutrality Requirements*, of the Performance Work Statement/Technical Requirements (PWS). As such, the PA is responsible for the fair and efficient overall administration of pooled numbering resources. The PA is a non-governmental entity that is impartial and not aligned with any particular telecommunication industry segment, and complies with 47 C.F.R. § 52.12.

Neustar Neutrality Compliance Procedures require Neustar to conduct neutrality refresher training in the first quarter of each year. All Neustar Board members,

designated contractors, and all employees, including pooling employees, must participate in a training session.

Neustar is subject to a number of neutrality audits that are performed on a quarterly and semi-annual basis. In connection with these audits, all of its employees, including pooling employees, its directors, and its officers, must review the neutrality requirements, and sign a neutrality certification stating that they are familiar with the neutrality requirements and have not violated them. Failure to comply with applicable neutrality requirements could result in government fines, corrective measures, curtailment of contracts, or even contract revocation. PA compliance with the FCC's neutrality rules is ensured by the Neustar Neutrality Officer John Manning, and the FCC.

### **1.3 Description of National Pooling Administration (PA)**

The PA performs the day-to-day number resource assignment and administrative activities with a long-term focus, which includes maintaining a system to support all day-to-day and long-term pooling functions.

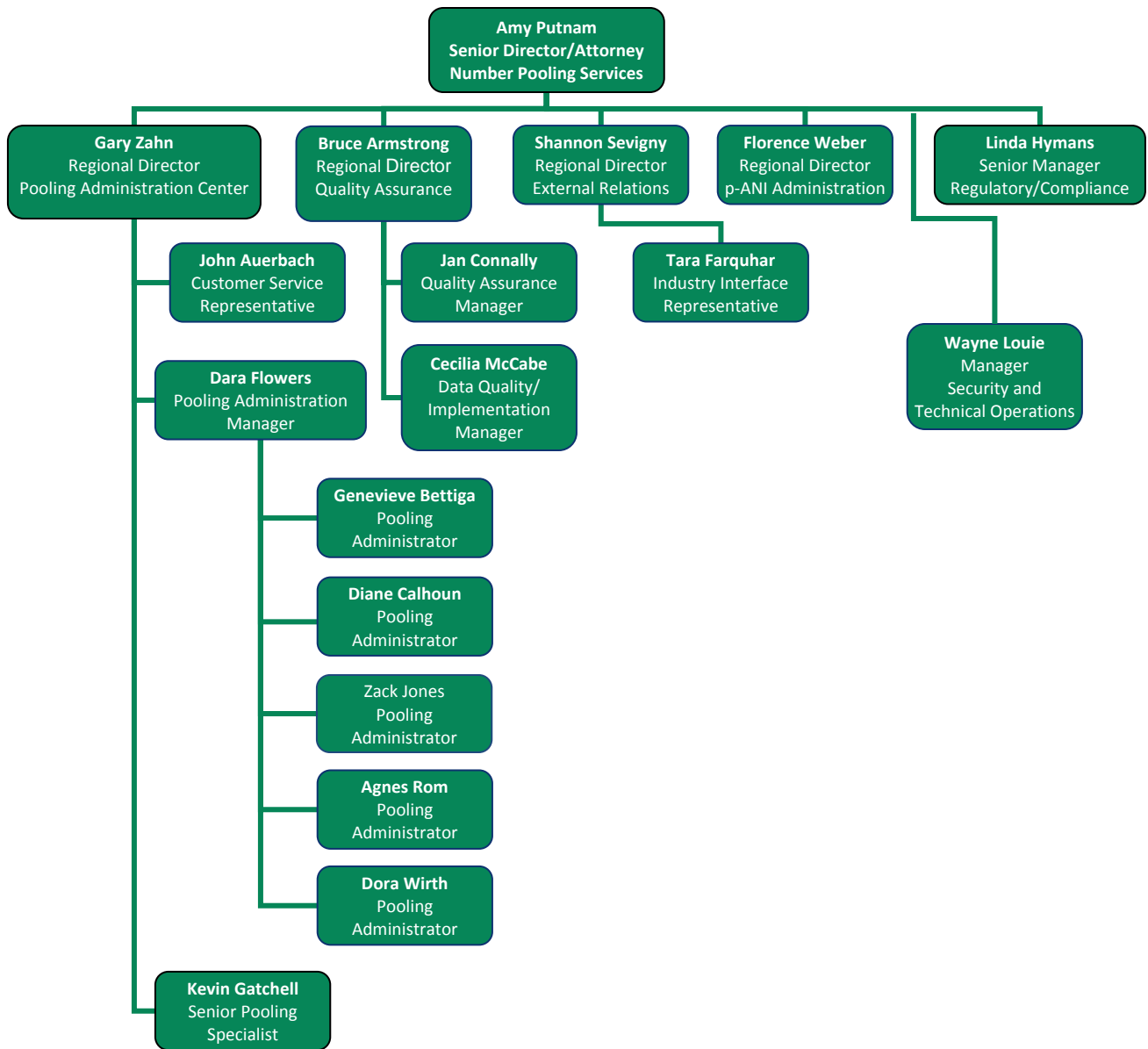
As such, the PA:

- Provides a standardized application of all administrative pooling guidelines,
- Develops tools and has implemented a system containing both hardware and software to facilitate the assignment, tracking, and data reporting requirements,
- Maintains interfaces with the North American Numbering Plan Administrator (NANPA), Number Portability Administration Center (NPAC), service providers, industry forums, (e.g., INC, CIGRR, etc.) and regulatory agencies, and
- Maintains and plans for adequate pool inventory numbering resources.

The PA also interacts with the NANPA and the NPAC vendor, while impartially administering thousands-block number pools by assigning, managing, forecasting, reporting, and processing data that allows service providers in rate areas designated for thousands-block number pooling to receive telephone numbers in blocks of 1,000. In addition, we maintain adequate pool inventory and accurate rate area designations.

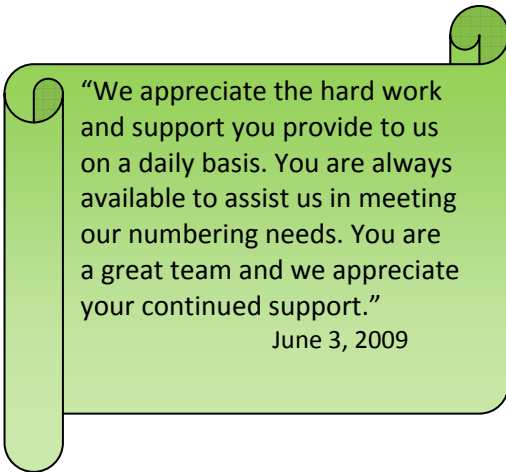
For further information on the PA requirements, see Clause C.1 of the CONTRACT FOR POOLING ADMINISTRATION SERVICES FOR THE FEDERAL COMMUNICATIONS COMMISSION, FCC Contract No. CON07000005.

### 1.4 Pooling Administration Organization Chart



## Section 2 - 2009 Pooling Administration Highlights and Significant Milestones

Following is a synopsis of the major pooling accomplishments of Neustar, as national Pooling Administrator (PA), during the 2009 reporting period. Details for these activities are found throughout the report.



### ★ Pooling Administration Contract

The two-year base period for the Pooling Administration contract ended on August 14, 2009. Having received a satisfactory review of PA performance, the FCC issued Contract Modification #8 on August 10 exercising Option One covering August 15, 2009 through August 14, 2010 in accordance with FAR 52.217-9.

### ★ Pooling Administration System (PAS) System

Customers were able to access the Pooling Administration System (PAS) 24 hours a day, seven days a week for the entire year, with 100% availability even during update and maintenance builds. *(For details, see Sections 2.3 and 6.)*

### ★ PA productivity at a glance (For details, see Section 2.2.)

ACTIVITY	2009 TOTAL
Applications processed (Part 3s):	87,781
Applications not processed in 7 calendar days:	0
Blocks assigned:	34,364
Change requests to existing blocks or codes:	33,202
Disconnects processed:	15,283
Withdrawals:	959
Block or code requests denied:	1,924
Donations processed:	9,425
Central office codes opened:	1,955
Red Light Rule denials:	90
Total reclaimed blocks:	49

### ★ Comprehensive and timely reporting

We produced 1,255 reports for the FCC, state regulatory agencies, the North American Numbering Council (NANC), NANPA, and service providers during the reporting period. (For details see *Section 9*.)

### ★ Industry support

In 2009, the PA attended over 130 industry meetings. We attended all Industry Numbering Committee (INC) meetings, submitting numerous issues and contributions. The PA also participated in meetings of the Network Routing Resources Information Committee (NRRIC), the Common Interest Group on Routing and Rating (CIGRR), the Local Number Portability Administration (LNPA) Working Group, the Emergency Services Interconnection Forum (ESIF), and the NANC's Future of Numbering (FoN) Working Group. The PA also participated in the two 2009 NANC meetings. (For details see *Section 8*.)

Data Quality and Implementation Management continued the quality control and maintenance of the pooling area files that are so critical to service providers, coordinated all 2009 quality improvements and made access to the implementation materials on the website easier. (For details, see *Section 2.4*.)

The PA staff met monthly with the Numbering Oversight Working Group (NOWG) in 2009, providing updates on various pooling administration activities. We also participated in the annual performance review and received a "More than Met" expectations rating. The PA worked, and continues to work cooperatively with the NOWG to make desired industry improvements while also meeting our contractual requirements. (For details, see *Section 8.3*.)

### ★ Regulatory and Compliance

We facilitated five state commission educational sessions on pooling issues and participated in six regulatory update calls with state regulatory staff. In addition we submitted all 98 required reports on time. (For details, see *Section 2.5*.)

### ★ Interim RNA Administration (p-ANI)

As Interim Routing Number Administrator (IRNA), we continued to work with the industry to process registrations and ESQK applications, resolve p-ANI issues, assist providers with ESQK issues, and respond to general inquiries regarding p-ANIs from both states and industry. We participated in the Emergency Services Interconnection Forum (ESIF) meetings, attended meetings to offer assistance and expertise, and continued development of a permanent p-ANI Administration Change Order. We received two new user registrations and 440 ESQK requests in 2009. (For details, see *Section 2.6*.)

### ★ Customer Focus

The PA maintained its constant focus on our customers' satisfaction in 2009. We had 67 customer focus items showing significant specific ways that we responded to the more remarkable requests of our customers. These items go beyond the day-to-day questions and requests from customers that the pooling staff members routinely field as part of their daily workload. In addition, we had no formal complaints, processed all applications on time, initiated an expansion of the very old overdue Part 4 project, and responded expeditiously to ad hoc report requests. (For details and more areas of customers focus, see *Section 2.9*)

## 2.1 Pooling Administration

### 2.1.1 Contract

The two-year base period for the Pooling Administration contract ended on August 14, 2009. In accordance with FAR 52.217-9 and after a satisfactory review of PA performance, the FCC issued Contract Modification #8 on August 10 exercising Option One covering August 15, 2009 through August 14, 2010.

### 2.1.2. Personnel

“Always helpful and so kind. Wonderful people you have working there.”

2009 PA Survey

There were two personnel changes in the Pooling Administration Services Center (PASC) personnel in 2009 which are reflected in the organization chart in Section 1.0. A listing of current Pooling Administration Services Center (PASC) personnel and their contact information can be found on [www.nationalpooling.com](http://www.nationalpooling.com) under “Contacts.”

“Thank you all for your assistance and guidance over the past year. Your personnel are always helpful and knowledgeable. The website is invaluable.”

2009 PA Survey

## 2.2 Pooling Administration Services Center (PASC), Concord CA

This section describes Pooling Administration Services Center (PASC) activity in 2009, including information about applications processed, blocks assigned, and NXX codes opened. Productivity statistics for the past five years of national thousands-block number pooling can be found in Section 10.0, *Trends in Pooling Since 2005*.

### 2.2.1 Pooling Administration Productivity for 2009

In 2009, the PA processed 87,781 applications (Part 3s) as shown in Table 2-1:

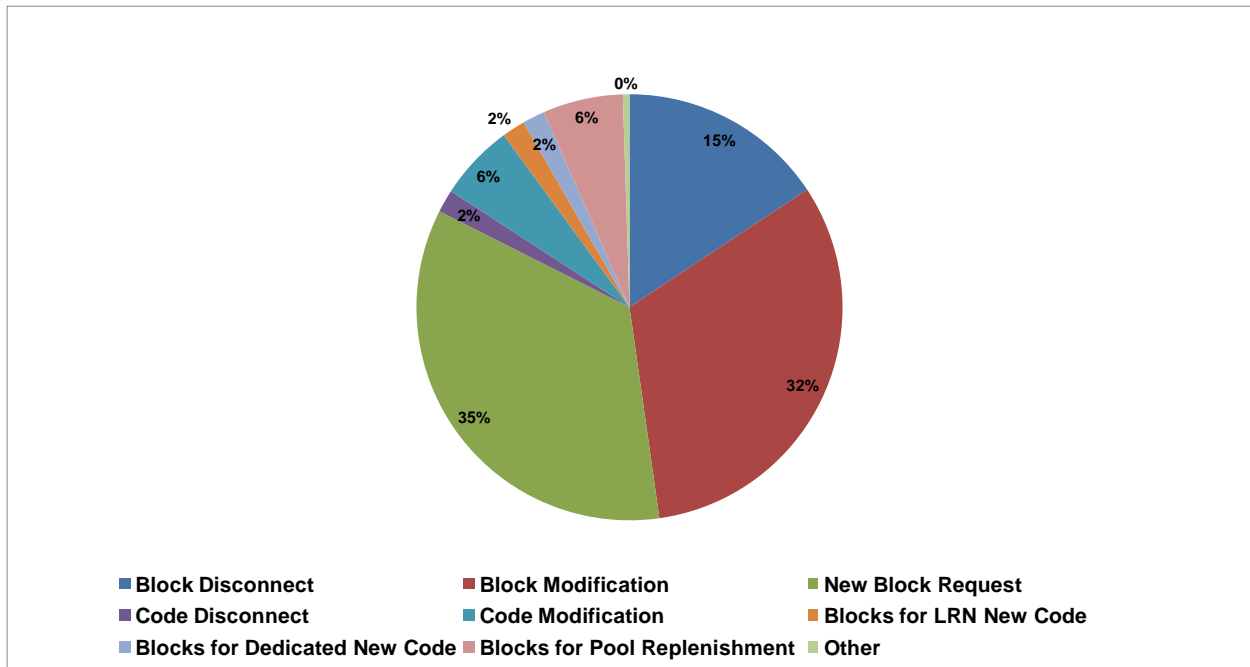
**Table 2-1**  
**Applications (Part 3s) Processed**

Approvals	75,226
Denials	2,444
Suspensions	9,152
Withdrawals	959
<b>TOTAL</b>	<b>87,781</b>

Table 2-2 and Figure 1 on the following page contain the total number of applications processed by activity type.

**Table 2-2  
Applications Processed by Type**

	<i>Approved</i>	<i>Denied</i>	<i>Suspended</i>	<i>Withdrawn</i>	<i>Total</i>	<i>Percent of Total</i>
Block Modifications	27,857	61	0	214	28,132	32%
Block Disconnects	9,967	53	3,662	88	13,770	16%
Block Cancel Disconnect	40	0	0	0	40	0%
Individual Blocks	28,481	1,570	0	401	30,452	35%
Block Reservations	170	50	0	6	226	0%
Process/Cancel Block Reservations	165	0	0	12	177	0%
Code Modifications	2,458	48	2,489	75	5,070	6%
Code Disconnects	179	306	1,006	22	1,513	2%
LRN locks	798	132	564	61	1,555	2%
Dedicated Customer Blocks	1,290	59	123	19	1,491	2%
Pool Replenishment Blocks	3,795	163	1,308	61	5,327	6%
Manual	26	2	0	0	28	0%
<b>Totals</b>	<b>75,226</b>	<b>2,444</b>	<b>9,152</b>	<b>959</b>	<b>87,781</b>	<b>100%</b>



**Figure 1 - 2009 Pooling Applications by Type**

Table 2-3 shows the number of NXX codes opened by the PA in 2009 and for what purpose.

**Table 2-3  
NXXs Opened by Purpose**

<i><b>Purpose</b></i>	<i><b>Total</b></i>	<i><b>Percent of Total</b></i>
LRN	553	28%
Dedicated Customer	129	7%
Pool Replenishment	1,273	65%
<b>TOTAL</b>	<b>1,955</b>	<b>100%</b>

The PA also issued:

- **10,694** Part 5s for block disconnects, reclamations, and exchanges during 2009.
- **9,967** actual block disconnects
- **959** Part 3s as a result of applications that were withdrawn upon the request of the service provider.

For the second year in a row, the PA processed **100%** of applications within seven calendar days, which far exceeds the performance metric of 97%.

There were 253,087 assigned blocks in PAS at the end of 2009 as compared with 229,336 at the end of 2008, an increase of 23,751 assigned blocks.



Figure 2 below shows the cumulative number of assigned thousand-blocks in the PAS by month as of December 31, 2009.

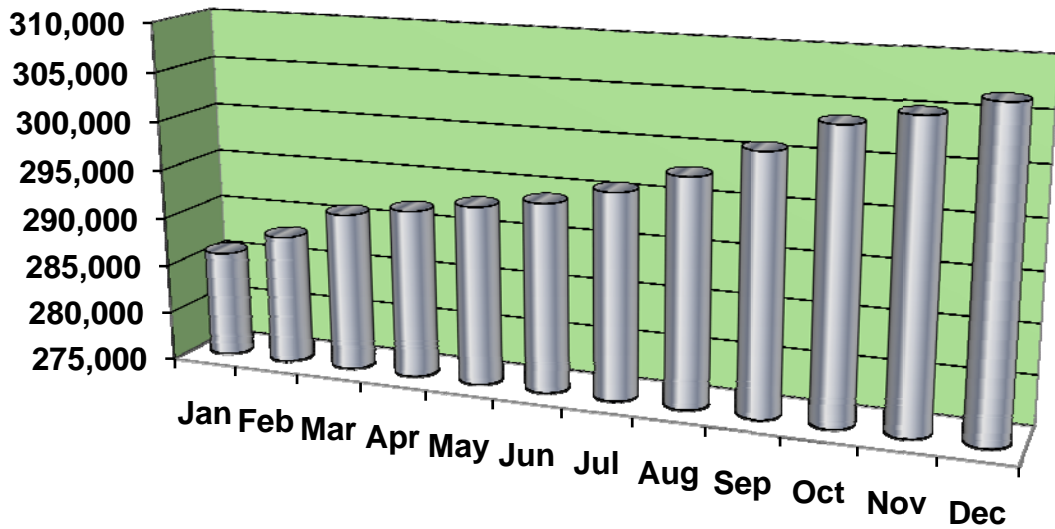


Figure 2 - Blocks Assigned in the PAS by month as of December 31, 2009

Figure 3 below depicts the monthly block assignments made by the PA during each month in 2009.

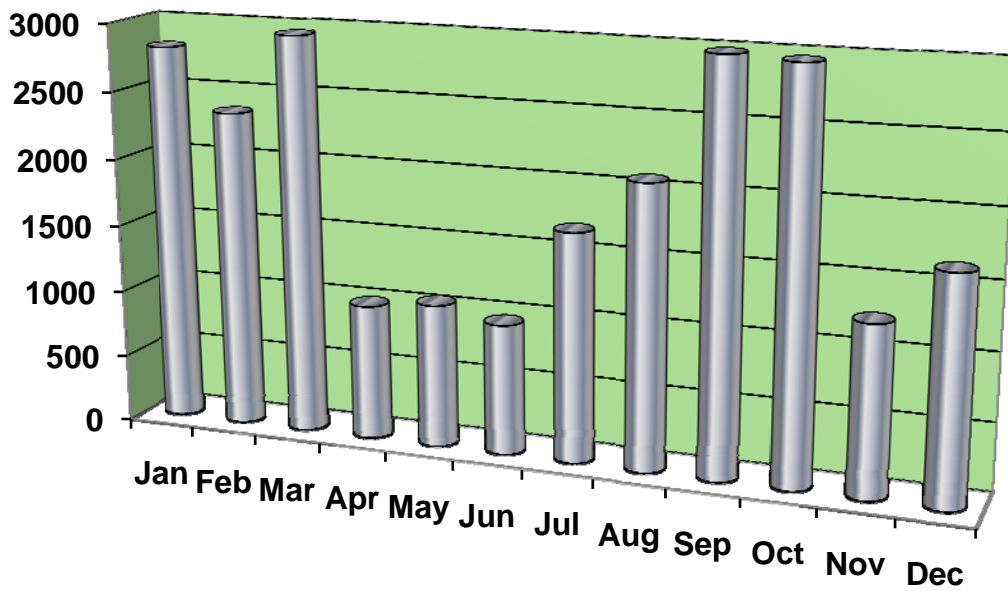


Figure 3 - Blocks Assigned by the PA during each month in 2009

The total number of applications processed is a measure of the actual processing work performed by the pooling administrators, because not every application results in the immediate assignment of a thousands-block. Although a large majority of applications for numbering resources are processed and approved immediately, some are suspended for future action, and some are denied or withdrawn entirely.

In addition to processing, the PAs also:

- Respond to questions and requests for assistance from service providers,
- Review documentation to assure entitlement to initial requests,
- Interact with state commission staff about certification issues and answer questions about the pooling process,
- Troubleshoot service provider misunderstandings with the PAS system,
- Walk new users through the pooling processes,
- Search for new block holders for blocks being returned with greater than 10% contamination,
- Search for new code holders for pooled codes being returned with blocks assigned,
- Assist with answering Help Desk calls.
- Work closely with the NPAC Pooling Coordinators to ensure that block requests are handled in accordance with industry guidelines,
- Ensure that NXX requests are handled in accordance to the INC guidelines by working closely with NANPA Code Administrators.

Figure 4 on the following page provides a complete overview of all applications processed in the PAS for 2009, which includes approvals, denials, withdrawals, and suspended applications.

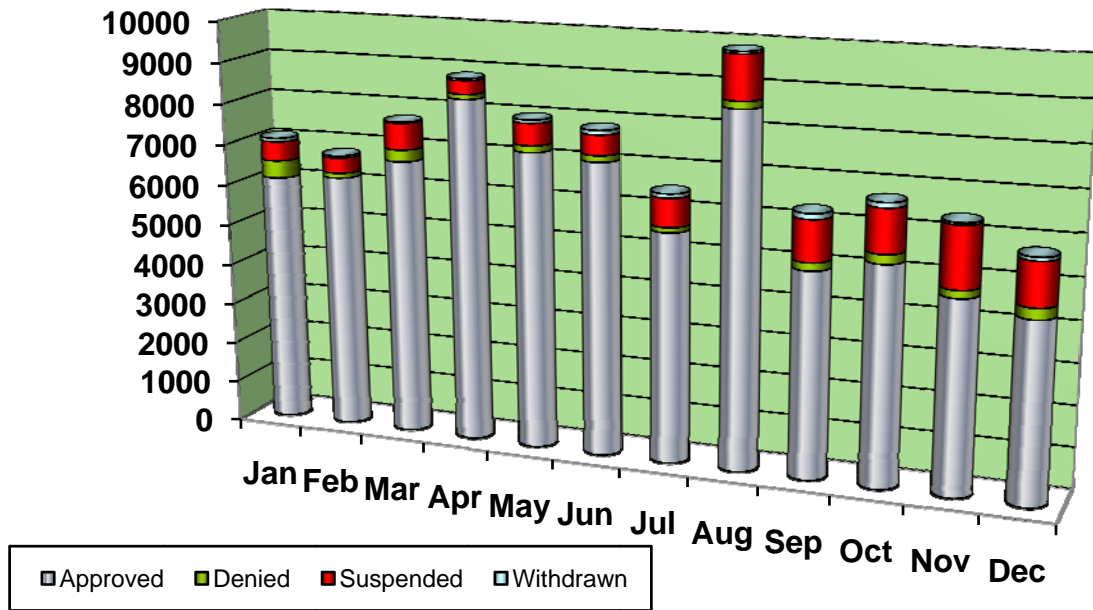


Figure 4 - Overview of All Applications Processed by Status

Tables 2-4 and 2-5 list the ten states and NPAs for which the highest number of applications (Part 3s) occurred in 2009:

**Table 2-4**  
Ten States with Highest Number of Applications (Part 3s)

State	Total Applications
CA	13,215
TX	6,967
NY	6,854
FL	4,778
OH	3,656
PA	3,623
IL	3,612
MI	3,203
VA	2,731
NC	2,494

**Table 2-5**  
Ten NPAs with highest number of Applications (Part 3s)

State	NPA	Total Applications
NY	347	2,436
NY	646	1,052
CA	323	878
CA	408	824
CA	714	816
TX	903	808
MD	443	798
IL	773	774
NM	505	697
TN	423	696

### 2.2.2 Pool Replenishment

During 2009, as inventories of many pools exhausted in the absence of additional voluntary donations, the PA continued working to replenish pool inventories and focus carriers' attention on keeping inventories adequate to meet forecasted demand.

While the PA has no authority to actually replenish the inventory pool because it is not authorized to obtain resources directly, we manage the process by determining when a pooling rate area inventory will fall below the aggregated six month service provider forecasts, which establishes that it is necessary for service providers to replenish the pool. For replenishment, the PA has to rely on the service providers that can meet both the MTE (Months-to-Exhaust) and utilization requirements to open an NXX code and then have them provide blocks from that NXX code to the pool.

In 2008, the INC approved a process that offers an option to a service provider applying for more than one block in a pool that needs to be replenished. The SP can take some of the requested blocks from the industry inventory pool and the remaining requested blocks from a new NXX code for pool replenishment. Through Change Order #1, it was implemented in PAS on May 16, 2008.

The PA kept track of which option the carriers chose when prompted with the pool replenishment option. The percentages for each option chosen were virtually identical for each month, with the highest requested action being requesting blocks only. We continued to provide the option data to the NOWG for the first five months of 2009 and then again in October to determine whether there had been changes in the pattern, but the percentages of actions chosen remained approximately the same. Table 2-6 shows which option the carriers chose when prompted with the pool replenishment option for six months in 2009.

**Table 2-6  
Split Requests for Pool Replenishment in 2009**

Type of request	Requested blocks only	Requested code only	Accepted a split up front	Escape	Totals
Description		Action: willing to wait and take all their blocks from opening a new code	Action: selected that they would take blocks now from inventory, but were willing to wait for a code opening for the rest	Action: escaped from the screen without doing anything	
January	163 (70%)	28 (12%)	27 (12%)	15 (6%)	233
February	174 (56%)	50 (16%)	58 (19%)	27 (9%)	309
March	143 (59%)	36 (15%)	31 (13%)	32 (13%)	242
April	105 (60%)	17 (10%)	30 (17%)	24 (14%)	176

Type of request	Requested blocks only	Requested code only	Accepted a split up front	Escape	Totals
May	130 (70%)	15 (8%)	28 (15%)	13 (7%)	186
October	276 (61%)	65 (14%)	45 (10%)	67 (15%)	453

Table 2-7 is an overview of pool replenishment statistics in 2009.

**Table 2-7  
2009 Pool Replenishment Overview**

Average number of rate areas per month that had less than a six-month inventory	<b>515</b>
Percentage of total number of rate areas per month that had less than a six-month inventory	<b>2.8%</b>
Average number of rate areas per month that had zero blocks available	<b>92</b>
Number of CO Code requests for pool replenishment	<b>1,493</b>
Number of CO Codes opened for pool replenishment	<b>1,172</b>

Tables 2-8 and 2-9 show the ten states and NPAs which had the most pool replenishment activity in 2009.

**Table 2-8  
Ten States with the Most Pool Replenishment Activity**

<i>State</i>	<i>Codes Opened</i>
PA	201
NY	91
CA	83
TX	82
IL	68
VA	62
FL	51
TN	46
MD	42
NC	40

**Table 2-9  
Ten NPAs requiring the Most Pool Replenishment Activity**

<i>NPA</i>	<i>Codes Opened</i>
PA 570	66
PA 814	45
NY 347	39
IL 773	33
MD 443	24
PA 267	21
PA 717	20
PA 724	17
TN 615	17
TX 832	16

### 2.2.3 Reclamation

The PA initiates reclamation according to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (TPBAG), which directs that, “[a] thousands-block assigned to a service provider should be placed into service by the applicable activation deadline, that is, six-months after the original effective date returned on the Part 3 and entered on the BCD/BCR screen in BIRRDs.” Each thousands-block assignment has an associated “Part 3 effective date,” which is the date the individual numbers in the thousands-block become available to be assigned to customers. The block holder confirms that the thousands-block is in-service by submitting a Part 4 to the PA. If the PA does not receive the Part 4 during the first five months following the original effective date identified on the Part 3, the PA sends a reminder notice to the block holder. The PA now also sends a second reminder to the SP on the day after the Part 4 was due.

If the Part 4 is not received within six months of the original Part 3 effective date, the Part 4 is considered delinquent and the thousands-block is eligible to be reclaimed. By the 10<sup>th</sup> calendar day of each month, the PA sends a list of delinquent Part 4s for the thousands-blocks from the previous month to the appropriate state commission or FCC.<sup>1</sup> There were a total of **9,839** blocks on the cumulative overdue Part 4s reports in 2009. Of those, **1,962** blocks were new to the lists in 2009.

The PA website provides detailed information about the reclamation process, as well as contact information for the participating state commissions and FCC.

In 2009, regulators authorized the PA to reclaim **49** thousands-blocks.

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<sup>1</sup> The FCC Report and Order and Further Notice of Proposed Rulemaking released March 31, 2000 (1<sup>st</sup> NRO Order) delegated authority to the state commissions to determine whether a thousands-block should be reclaimed or not. The FCC makes reclamation decisions for those states that have opted not to exercise their reclamation authority.

Table 2-10 identifies the state where blocks were authorized to be reclaimed and the number authorized in each state in 2009.

**Table 2-10  
State and Number of Blocks Reclaimed**

State	Blocks Reclaimed
VIRGINIA	27
TEXAS	5
WISCONSIN	4
NEW YORK	4
MICHIGAN	2
INDIANA	2
GEORGIA	2
UTAH	2
NEW JERSEY	1
<b>TOTAL</b>	<b>49</b>

## 2.3 Pooling Administration System (PAS)

### 2.3.1 PAS Performance

As set forth in more detail in *Section 6*, PAS was available 100% of the time in 2009, which means the PA once again far exceeded the contract requirement of 99.9% availability. The PA maintained that PAS availability during the four builds implemented in 2009. See 2.3.2.2 for a description of the PAS improvements made during 2009.

### 2.3.2 Pooling Administration System (PAS) Change Orders/Improvements

Improvements to PAS are generally driven by changes to FCC rules, industry guidelines, or specific service provider or regulatory requests. If such changes or suggested improvements

require a change to the PA contract or system, a change order proposal would be submitted to the FCC. The PA must provide “a written assessment regarding the impact of scope of work, time and costs to the INC, the NANC and the FCC within 15 calendar days of any changes to the INC Guidelines that have such an impact.”<sup>2</sup>

The NOWG currently reviews PA change order proposals and provides recommendations to the FCC. To facilitate the review process, the Regional Director, External Relations serves as the liaison with the NOWG to address any questions that may arise from their review of any change order proposal.

The PA submitted four change order proposals to the FCC in 2009, covering a variety of system or process changes that are not addressed in the current contract with the FCC.

Table 2-11 provides a description of each 2009 change order and its status as of December 31, 2009.

<sup>2</sup> FCC contract No. CON07000005, Section 2.5.4 of Section 3 Description /Specification/Work Statement dated July 31, 2007

**Table 2-11  
Change Orders Submitted by the PA in 2009**

<b>Number</b>	<b>Type</b>	<b>Description</b>	<b>NOWG Recommendation</b>	<b>FCC Status</b>
7	INC Issue 592	Changes to the TBPAG and COCAG for Mass Update Modification	Approved	Approved
8	INC Issue 613	Notification of an SP missing the Part 4 Due Date	Approved	Approved
9	INC Issue 632	Updates to the Dedicated Code section of the TBPAG and COCAG	Approved	Pending
10	SP Enhancements	User-Proposed Enhancements to PAS	Approved	Pending

The FCC approved four change orders in 2009. Table 2-12 provides details on each change order for which there was an FCC decision in 2009.

**Table 2-12  
Change Orders Approved by the FCC in 2009**

<b>Number</b>	<b>Type</b>	<b>Description</b>	<b>NOWG Recommendation</b>	<b>FCC Status</b>
5	INC Issue 602	Checking returned blocks in NPAC	Approved	Accepted-Contract Modification #6 on 2/17/2009
6	SP Enhancements	User-Proposed Enhancements to PAS	Approved	Accepted – Contract Modification #6 on 2/17/2009
7	INC Issue 592	Changes to the TBPAG and COCAG for Mass Update Modification	Approved	Accepted - Contract Modification #6 on 2/17/2009



Number	Type	Description	NOWG Recommendation	FCC Status
8	INC Issue 613	Notification of an SP missing the Part 4 Due Date	Approved	Accepted – Contract Modification #7 on 4/9/2009

Table 2-13 shows the five change orders that we implemented during 2009 (one of which had been approved in 2008), with descriptions of the changes that were incorporated into the PAS in 2009.

**Table 2-13  
Change Orders Implemented in 2009**

<i>Change Order Number</i>	<i>Description of Changes</i>	<i>Implemented</i>
3	<p><b>User-Proposed Enhancements to PAS:</b></p> <p><b>1. Additional Validations for Block Donations</b> Three new validations were added to PAS to reduce the errors made on donations being submitted in PAS.</p> <ul style="list-style-type: none"> <li>• For a block that is shown as retained, PAS will now validate that the OCN entered for the block donation matches the OCN shown in PAS for the block. If the OCN does not match, PAS will return an error message.</li> <li>• For a block that does not currently exist in the system, PAS will validate that the OCN entered for the block donation matches the OCN on the code. If the OCN does not match, PAS will return an error message.</li> <li>• PAS will validate that the rate center for the donated block matches the rate center of the code. If the rate center does not match, PAS will return an error message.</li> </ul> <p><b>2. Modification to Part 1A report to include Part 1s for code modification and code disconnect requests</b> The <i>Part 1A</i> report has been renamed to the <i>Part 1/1A</i> Report and will now include code modification requests and code disconnect requests.</p>	January 23, 2009

<b>Change Order Number</b>	<b>Description of Changes</b>	<b>Implemented</b>
	<p><b>3. New “Code Holder” column added to the Block Report on National Pooling website</b>            A new “Code Holder” column has been added to both the <i>Available Blocks</i> report and the <i>Assigned, Retained &amp; Available Blocks</i> report, both found on the National Pooling website. The new column will show the OCN and company name of the code holder for blocks that are in an available status.</p> <p><b>4. Change in color of font for user password reset screen for easier viewing</b>            The password reset screen has been changed to show the user ID and new password in a larger and darker font so that it is more easily viewable to users.</p> <p><b>5. Modification to Block Part 4 process to allow for submission of multiple Part 4s on one submission</b>            A new enhancement has been added to PAS to streamline the submissions of Part 4s by allowing users to submit multiple Part 4s for the same state and NPA in the same submission. Prior to this enhancement, users were only able to submit one Part 4 at a time.</p>	
5	<p><b>INC Issue 602- Checking returned blocks in NPAC:</b></p> <p>Provides the ability for the PA to check the porting information in the NPAC for all block returns. Because every block return must be sent to NPAC to check for up-to-date contamination information, block disconnects cannot be processed on the same day they are received. If a block is reported as 10% or less contaminated at the time of the return, PAS will automatically create a Part 3 suspend. When the PA approves a block return, PAS will update the block contamination information based on the information received from NPAC. The contamination information will be provided on the Part 3 response and reflected on the Block Report.</p>	July 24, 2009
6	<p><b>User-Proposed Enhancements to PAS:</b></p> <p>Included several enhancements that were suggested to the PA by service providers and service provider</p>	May 15, 2009

<b>Change Order Number</b>	<b>Description of Changes</b>	<b>Implemented</b>
	consultant users of PAS. <ul style="list-style-type: none"> <li>• New standard language was added to the Part 3 remarks field when a new block request is approved and the block assigned from the code has the same OCN and same switch as the code.</li> <li>• A “Delete” button was added to the Saved Block Request list screen to allow SP and SPC users the ability to delete saved requests.</li> <li>• The SP/SPC user now has the option to enter information about multiple switches on requests for new blocks and new codes (LRN and Pool Replenishment requests only).</li> <li>• The SP/SPC user now has the option to “Withdraw Pending Requests” via PAS (for all request types).</li> </ul>	
7	<b>INC Issue 592- Changes to the TBPA and COCAG for Mass Update Modification:</b>  Requires the PA to accept mass modifications for intra-company OCN changes, switching/POI changes and/or Part 1B changes for a minimum of 50 blocks and a maximum of 500 blocks. Part 1B changes are new to the mass modify process. <b>NOTE:</b> Part 1B information will be updated only in PAS. SPs will still be required to work directly with NPAC to have their Part 1B information updated in the NPAC database.	July 24, 2009
8	<b>INC Issue 613 - Notification of an SP missing the Part 4 Due Date:</b>  A new <i>Overdue Part 4 Reminder</i> email will be sent to SP/SPC users one day after the Part 4 due date has passed if the Part 4 has not been submitted.	May 15, 2009

In 2009 there were four PAS builds, of which three were related to change orders and one was for the purpose of system maintenance. Customers experienced no PAS unavailability as a result of these builds. For more detail, see *Section 6.4*.

**Table 2-14  
PAS Updates in 2009**

DATE	CHANGES
January 23	Change Order 3
May 15	Change Orders 6 and 8
July 24	Change Orders 5 and 7
October 16	General Maintenance

website and PAS. The regulator session provided a refresher on the PAS and application processing as well as a review of the pooling website. In addition, question-and-answer documents were developed to enable participants to have a written record of questions asked during the sessions, and these were emailed to the participants.

“The PAS system training was very thorough.”

### 2.3.3 PAS and Website Overview Sessions

In a continuing effort to make the pooling process as user-friendly as possible, the PA conducted a total of five web-based training sessions in 2009; four for service providers, and one for regulatory users. The four service provider sessions were targeted toward those persons new to pooling processes that could benefit from a training session on using the

Table 2-15 contains the training descriptions, dates and number of attendees.

**Table 2-15  
2009 PAS Training**

Description	Date	Number of Attendees
Web-based overview of the PAS and website for <b>Service Providers and Service Provider Consultants</b>	March 31	14
	April 2	9
Web-based overview of the PAS and website for <b>Regulators</b>	September 23	14
Web-based overview of the PAS and website for <b>Service Providers and Service Provider Consultants</b>	December 1	11
	December 2	21

### 2.3.4 Help Desk

The Customer Support Representative (CSR or Help Desk) is the human interface between the PAS and our customers. The Help Desk responds to both internal and external questions and requests for technical support, and attempts in real time to confirm and resolve the cause of a problem.

In 2009, the Customer Support Desk handled approximately 3,400 calls from customers. For more details on Help Desk calls please see *Section 8.7*.

### 2.4 Pooling Implementation Management

The Data Quality and Implementation Manager (DQIM) manages the quality control and maintenance of the rate area files located on the website, completes the semi-annual forecasting reports, updates the PAS in the event of area code relief, and provides status updates for the industry at NANPA meetings. In

2009, the DQIM provided 41 pooling status reports to the NANPA for its meetings and voluntarily attended five NPA relief implementation subcommittee meetings to provide subject-matter expertise on pooling issues.

#### 2.4.1 Rate Area File Quality Control and Maintenance

The rate area files identify the participation status designation of all rate areas in each NPA, including where service providers are either required to participate in pooling (Mandatory), are required to participate when a second service provider enters the rate area (Mandatory Single Service Provider), may participate in pooling (Optional), or where pooling is not required, and no carrier has chosen to pool (Excluded).

The six current status designations of rate areas as defined in the *NPA/Rate Area Reports* are defined in Section 3.

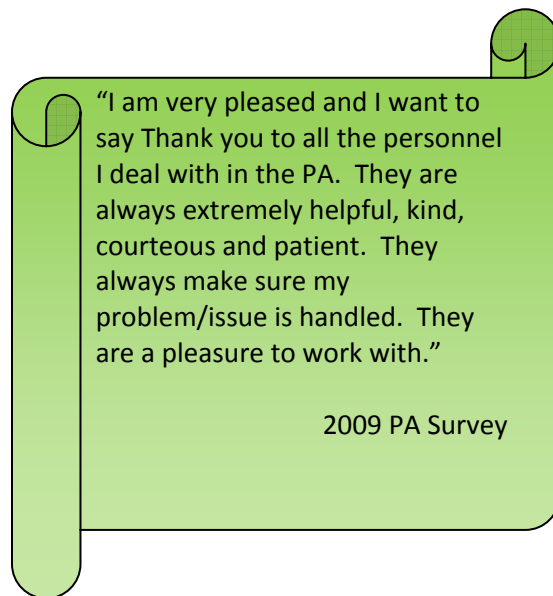


Table 2-17 shows the total number of distinct pooling rate areas in PAS by year.

**Table 2-17  
Total Number of Distinct Pooling Areas in PAS by Year**

<i>Status Designation</i>	<i>2005</i>	<i>2006</i>	<i>2007</i>	<i>2008</i>	<i>2009</i>
<b>M*</b>	675	583	519	460	441
<b>M</b>	4,679	4,765	4,820	4,861	4,891
<b>O</b>	6,335	6,439	5,728	5,460	5,747
<b>M</b>	1,479	1,636	2,401	2,827	2,848
<b>M*</b>		216	547	677	647
<b>X</b>	5,489	5,004	4,605	4,315	4,023
<b>Total</b>	<b>18,657</b>	<b>18,643</b>	<b>18,620</b>	<b>18,600</b>	<b>18,597</b>
<b>Total Pooling Areas</b>	<b>13,168</b>	<b>13,639</b>	<b>14,015</b>	<b>14,285</b>	<b>14,574</b>
<b>Total Mandatory Pooling Areas</b>	<b>6,833</b>	<b>7,200</b>	<b>7,221</b>	<b>7,688</b>	<b>7,739</b>

#### 2.4.2 Rate Area File Changes

The DQIM is responsible for the accurate recording of all pooling information associated with every NPA, including the status designation for each rate center. In addition, the DQIM monitors and makes all of the changes related to pooling areas that occur as a result of FCC and state orders and Office of Management and Budget (OMB) directives.

If there are changes to Metropolitan Statistical Area (MSA) information, the OMB generally releases a bulletin about it early in the year. The PA monitors the website so that we know when bulletins are issued and then investigates the impact on the status designations of rate centers in the pools. In January, 2009, the OMB issued one bulletin, OMB 09-01, that changed the name of the Denver-Aurora, CO MSA to Denver-Aurora-Broomfield, CO MSA. There were 24 rate centers impacted by this change.

Each July, the Census Bureau issues its annual population estimates by county. We use this data to determine how it affects the top 100 MSAs. MSAs may be added to top-100 list, thereby making the affected rate centers mandatory, but the mandatory status of rate areas that are associated with MSAs that drop out of the top 100 does not change. In 2009, the Provo-Orem, UT MSA moved from the rank of 103 to 93, and Modesto, CA moved to 101. There were 12 rate centers in Utah that were impacted by the MSA update and their statuses were changed to mandatory.

Rate center file changes have been available in real-time through the website since September, 2008. In 2009, the PA made 348 rate area designation changes.

Table 2-18 shows how many rate areas were changed during each month in 2009.

**Table 2-18  
Summary of Rate Area Designation Changes for 2009**

<b>2009 RATE CENTER CHANGES</b>													
<b>REASON</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>TOTALS</b>
<b>Changes in Status:</b>													
M* to M		2	1	1	1	1	12	1			2	2	23
M* to M	1	4	2	2	5		4	1	1	6	4	1	31
M to M*													0
M to M*							4						4
M to M							14						14
O to M	1						1						2
O to M													0
O to M*													0
X to M													0
X to M*							2						2
X to M*													0
X to O	6	41	10	19	1	64	5	26	11	42	44	1	270
New Rate Centers	1												1
Deleted Rate Centers													0
Rate Center Name Change				1									1
<b>TOTALS</b>	<b>9</b>	<b>47</b>	<b>13</b>	<b>23</b>	<b>7</b>	<b>65</b>	<b>42</b>	<b>28</b>	<b>12</b>	<b>48</b>	<b>50</b>	<b>4</b>	<b>348</b>

**2.4.3 NRUF/Semi-Annual Forecast Report:**

The NRUF (Numbering Resource Utilization/Forecasting) report (Form 502) is used by the NANPA to monitor and project exhaust in individual area codes as well as in the NANP overall. Service providers participating in pooling are required by 47 CFR §52.15 (f)(6) to

submit their NRUF to the NANPA on a semi-annual basis on or before February 1 for the period ending on December 31, and on or before August 1 for the period ending on June 30 of each year. Service providers also submit the Thousands-Block Forecast Report (Appendix 1 in the TBPAG) to Pooling Administration for each of their separate OCNs at the thousands-

block level, per rate area, for every NPA in which they have resources, as of June 30 and December 31, each year. This semi-annual report includes a five-year forecast of demand for blocks-by-year. The data provided by the service providers in these forecasts is treated as confidential by the PA.

During 2009, the PA aggregated the data provided by the service providers at the rate area level for all NPAs in pooling. We used this data to provide a rate area NRUF to NANPA and to determine if a critical industry inventory

insufficiency existed within any rate area. The PA forwarded its aggregated NRUF data to the NANPA, and provided a separate consolidated forecast report to the FCC according to the required deadlines, within 21 calendar days of both the February 1, and August 1 dates.

Table 2-19 contains the overall PA NRUF/forecast results for both semi-annual reporting periods in 2009.

**Table 2-19  
NRUF/Forecast Results for 2009**

<b>DATE</b>	<b>NPAs</b>	<b>JURISDICTIONS</b>	<b>BLOCKS FORECASTED</b>	<b>BLOCKS AVAILABLE</b>	<b>CODES FORECASTED</b>
<b>February</b>	<b>280</b>	<b>52</b>	<b>53,732</b>	<b>177,338</b>	<b>2,737</b>
<b>August</b>	<b>283</b>	<b>52</b>	<b>27,658</b>	<b>181,351</b>	<b>1,020</b>

## 2.5 Regulatory and Compliance

authority petitions, p-ANI administration, the PA Survey, and relevant INC issues.

### 2.5.1 Regulatory Update Conference Calls

In 2009, the PA participated in six regulatory update conference calls: on January 22, March 26, June 4, August 13, October 22, and December 12. Topics included updates on pooling administration activities, delegated

### 2.5.2 Regulatory Educational Sessions

The PA conducted five educational sessions for state regulatory personnel both in-person and via conference call in 2009. Table 2-20 describes the regulatory educational sessions facilitated by the PA in 2009.



**Table 2-20  
Regulatory Training Sessions in 2009**

Date	State/Group	Type	Description
March 10	Alaska	Commission Workshop via Conference Call	“Pooling 101”
April 23	Pennsylvania	In-Person	Pooling Status Update and Education
May 6	State Coordination Group (SCG)	Conference Call	Pooling Administration Overview
May 20	Washington	Conference Call	Pooling Status Update
October 19	Washington	Conference Call	PAS Overview and Website Review

The “Pooling 101” training for Alaska state regulators and service providers on March 10 was part of a number conservation workshop held by the Regulatory Commission of Alaska. We developed the “Pooling 101” presentation for new pooling areas so that the affected service providers and regulators could more fully understand the pooling processes as well as the PAS and website capabilities. The “Pooling 101” presentation is available on the website under DOCUMENTS. The PA also facilitated a pooling administration overview and refresher on the reports available through the pooling website on May 6 that was attended by 19 regulatory staff from 13 states.

During the other educational sessions, we reviewed various pooling processes and procedures such as reclamation, forecasting, and application processing,

in addition to the information and reports available through the website. Our goal in conducting these sessions is to make it easier for regulators to respond to thousands-block pooling issues in their states.

### **2.5.3 Regulatory Support**

During 2009 the PA provided support for state regulators as they addressed number conservation and NPA relief planning issues. We attended 28 NANPA meetings relating to NPA relief and jeopardy, providing an up-to-date pooling status for the affected NPAs. In addition we attended workshops and meetings that were scheduled by state commissions to discuss numbering issues and to provide pooling information when required.

We attended the following commission meetings in 2009:

<i>Date</i>	<i>State/NPA</i>	<i>Purpose</i>
February 3	Utah/801	NPA relief hearing
February 10	Alaska/907	Number conservation workshop
March 5	Oklahoma/918	NPA relief meeting
March 10	Alaska/907	Number conservation workshop and Pooling 101 training
April 2	Oklahoma/918	NPA relief meeting
April 20	Nebraska/402	NPA relief meeting

**2.5.4 Debt Collection Improvement Act of 1996, FCC 04-72, MD Docket 02-339, adopted March 25, 2004 (Red Light Rule)**

The “Red Light Rule” provides that anyone filing an application or seeking a benefit from the FCC or one of its components (including the Universal Service Administrative Corporation, the Telecommunications Relay Service, or the North American Numbering Plan Administrator) who is delinquent in debts owed to the FCC will be barred from receiving a license or other benefit until the delinquency has been resolved. Numbering resources were deemed to constitute a benefit. Therefore, the FCC directed the PA to withhold assignment of numbering resources to any entity identified by the FCC as delinquent in its payments to them.

The PA processed **90** denials as a result of the Red Light Rule in 2009, down from **229** in 2008.

**2.5.5 Reporting Compliance**

The following are the Contract Data Requirements List (CDRL) documents required by the PA contract and submitted during the 2009 calendar year. The chart identifies the current contract section number and when those required reports were submitted.

**2.5.5.1 Contract Data Requirements List (CDRL) – Recurring Reports**

The following CDRL reports must be submitted annually, semi-annually, quarterly, and monthly. Table 2-21 contains the Contract Data Requirements List (CDRL) recurring reports that were submitted by the PA during the 2009 calendar year according to the established deadlines. In 2009, the PA submitted 111 CDRL reports. These reports are available on the PA website.

**Table 2-21  
Recurring CDRL Reports Submitted in 2009**

REPORT NAME	SECTION REFERENCE	REQUIRED INTERVAL	DATES SUBMITTED
Staffing Report	CDRL 4.6.4.3 per Section 2.3	1 <sup>st</sup> working day of the month	Dec 31, Feb 1, Feb 27, Apr 1, May 1, Jun 1, Jul 1, Aug 3, Sep 1, Oct 1, Nov 2, Dec 1

REPORT NAME	SECTION REFERENCE	REQUIRED INTERVAL	DATES SUBMITTED
Thousands –Block Pooling Report	CDRL 4.6.4.1 per Section 2.21 Also see 2.22.4.5	Monthly	Jan 15, Feb 17, Mar 16, Apr14, May 14, Jun 15, Jul 15, Aug 17, Sep 15, Oct 14, Nov 16, Dec 15
System Performance Report	CDRL 4.6.4.2 per Section 2.22 Also see 2.22.4.5	Monthly	Jan 15, Feb 17, Mar 16, Apr14, May 14, Jun 15, Jul 15, Aug 17, Sep 15, Oct 14, Nov 16, Dec 15
Ad Hoc Reports	CDRL 4.6.5 per Section 2.22.4.5, as modified by Contract Mod #3	Monthly	Jan 15, Feb 17, Mar 16, Apr14, May 14, Jun 15, Jul 15, Aug 17, Sep 15, Oct 14, Nov 16, Dec 15
Pooling Matrices Report	CDRL 4.6.3.1 Per Section 2.21.2 Also see 2.22.4.5	Quarterly	Jan 15, Apr 14, Jul 15 and Oct 14
Forecasted Demand	CDRL 4.6.2.1 Per Section 2.17.1	Semi-Annual	Feb 13 and Aug 20
Rate Area Inventory Pool Status	CDRL 4.6.2.2 and Section 2.16.5	Semi-Annual	Feb 13 and Aug 20
Annual	CDRL 4.6.1 Per Section 2.21.1	Annual	Mar 31
By Request ( <i>Ad Hoc</i> )	CDRL 4.6.5 Per Section 2.21.3	Within three business days	January – 3 February – 6 March – 5 April – 1 May – 2 June – 7 July – 3 August – 4 September – 7 October – 10 November – 4 December - 2

### 2.5.5.2 Other Required Reports

Table 2-22 lists the 41 other reports required by the contract that the PA submitted in 2009.

**Table 2-22  
Other Required Reports Submitted in 2009**

REPORT NAME	SECTION REFERENCE	REQUIRED INTERVAL	WHERE	DATES SUBMITTED
Staffing Report	Section H.3.3	Monthly	To FCC only	Dec 31, Feb 1, Feb 27, Apr 1, May 1, Jun 1, Jul 1, Aug 3, Sep 1, Oct 1, Nov 2, Dec 1
Progress Report	Section G.5	Monthly by the 15 <sup>th</sup> of the month	To FCC only	Jan 15, Feb 13, Mar 13, Apr 14, May 14, Jun 15, Jul 15, Aug 14, Sep 15, Oct 14, Nov 13, Dec 15
Monthly Pooling Metrics	Section 2.22.4.5	Monthly	To PA Website only	Jan 15, Feb 17, Mar 16, Apr 14, May 14, Jun 15, Jul 15, Aug 17, Sep 15, Oct 14, Nov 16, Dec 15
Quarterly Pooling Metrics	Section 2.22.4.5	Quarterly	To PA Website only	Jan 15, Apr 14, Jul 15 and Oct 14
Inventory	Per Section 3.21	Annual	To FCC	Jun 26

### 2.6 Interim RNA Administration (p-ANI)

On September 6, 2006, the FCC designated the PA as the Interim Routing Number Administrator (IRNA) and authorized it to assign ESQs under certain limited circumstances. In 2009, we responded to general inquires regarding p-ANIs, assisted providers with p-ANI related issues, and attended industry meetings to address p-ANI related items. In 2009, the IRNA received two new user registrations and 440 ESQK requests. (For details, see Table 2-23.)

When the FCC awarded the new PA contract in August, 2007, it included the provision that the

new national PA will act as the permanent p-ANI Administrator once the FCC directs the permanent process. As of December 31, 2009, the permanent process for p-ANI administration has not been directed by the FCC. However, at the request of the FCC, we continued to work on developing a change order outlining how we would implement the permanent p-ANI Administration Guidelines along with a project plan. We also continued to refine the detailed system requirements as a result of changes made to the permanent p-ANI Administration Guidelines.

In 2009, we worked with the Emergency Services Interconnection Forum (ESIF) and the Industry Numbering Committee (INC) on refining the permanent p-ANI Administration Guidelines by providing contributions with proposed changes to the guidelines. (See Section 8 for more details.) In addition, Amy Putnam continued her responsibilities as the ESIF-ECDR co-chair in 2009.

We addressed a variety of issues this year that did not involve assignment of ESQs, but required our assistance. These included:

- Proactively contacting the existing administrators where a new NPA has been implemented, to determine which, if any, ESQs have been assigned, and updating our data accordingly,
  - Fielding and responding to questions from state commissions on what ESQs have been assigned in their state, or on other p-ANI related questions; and
  - Working with select carriers on providing sample annual report data to help us better understand issues that may arise when developing the permanent p-ANI Administrator’s available p-ANI inventory.
- Assisting wireless carriers in need of ESRs,
  - Working with grandfathered administrators to resolve their data discrepancies,
  - Resolving requests for ESQs in NPAs where we have no available ranges to assign from,

**Table 2-23  
Interim RNA Activity from 2006 through 2009**

	2006	2007	2008	2009
<b>ESQK New User Registrations Received</b>	4	2	3	2
<i>Approved</i>	3	1	1	1
<i>Denied</i>	1	1	2	1
<b>ESQK Requests Received</b>	0	1	19	440
<i>Approved</i>	0	0	18	432
<i>Denied</i>	0	1	1	8

## 2.7 2009 Annual PA Performance Survey

We sent the annual PA performance survey out to PAS users on October 13, 2009, and closed the response period on October 30. This survey is voluntary on our part and is used to gauge our customers' satisfaction with our performance and to determine where we can make improvements. Participants had a choice of returning the completed survey either online, or by email, fax or mail. Prospective survey participants were asked to rate PA performance on a scale of one to five, with one (1) being lowest and five (5) being highest. We developed the 21 questions to measure our performance in user interface, timeliness, knowledge, website information and overall customer service. There were 160 surveys returned, 29 of which were from state regulators.

There was a 33% increase in the total number of surveys returned from the 2008 survey. Survey scores were consistent with those from the 2008 survey, with an overall average score of 4.6 out of a possible 5.0 for the 21 questions. See *Section 8.6* for more detail on the survey results and comments from the participants.

## 2.8 Special Projects in 2009

### 2.8.1 Service providers not participating in mandatory pooling areas project

In December, 2008, we began an analysis of PAS data to identify companies that have numbering resources (CO codes) assigned to them in mandatory pooling rate centers but are not participating in pooling in those rate centers. This report, previously identified as the *Non-Participating Service*

*Provider Report*, was an FCC-requested report that is not referenced in the contract. Prior to submitting the report to the FCC in 2009, we provided a list of the relevant rate centers and CO codes to those companies and asked them to advise us as to whether they could either (1) return the code, if unused; (2) donate any thousands blocks to the pool that are not necessary for their six-month inventory and are not over 10% contaminated; or (3) explain if and why they could not return the code or make a donation to the pool. This was time-consuming for the PA, but beneficial in two ways: (1) it would enable SPs to alter their status in these rate centers and be removed from the list, and (2) it would return unused resources to the administrators.

We cross-referenced the list with PAS user data to determine which companies appeared to be active (i.e. had active users in PAS) and which appeared to be inactive (i.e., no active users in PAS, possibly out of business). We followed that up with independent research to ascertain whether we could find other contact information for any of the apparently inactive companies or to see if any of those companies had been involved in business acquisitions or mergers that would result in changes of name.

For the apparently active companies:

- We sent emails to 225 different OCNs.
- We received responses from 120 (53%) of the OCNs.
- Of those, 36 OCNs advised that they had returned **19** codes and **653** thousands blocks.
- 42 OCNs responded that all their blocks were over 10% contaminated.
- The remaining 42 OCNs that responded (but did not return resources or state that they had

over-contaminated blocks) provided other responses that either resolved the issues or required additional contact with the company.

From the list of companies for which we found no contact information:

- We updated this list to make sure that all codes we found when we ran the report in December 2008 were still showing as assigned in NAS and were showing in the LERG.
- We initiated an investigation into the possible reclamation of the remaining blocks on the list.
- We notified and began working with NANPA on possible reclamation of codes.

### **2.8.2 Website Overhaul for Implementation Meeting Materials**

On April 6, 2009, the PA transitioned over 14,000 pooling implementation meeting materials and minutes files to a new format and location on the website to make them easier for our customers to locate and access. This culminated a several-month process of examining each of the over 14,000 files, categorizing all of them, reducing the files to approximately 1,400 necessary historical files, renaming them in a common file name convention and producing a logical directory for our systems people to move all files to a Neustar server. These documents can now be found on the website under DOCUMENTS and *FIM/SIM Meeting Materials and Minutes*.

### **2.8.3 Expansion of Reducing Very Old Delinquent Part 4s Project**

In June 2009, the PA sought authorization from the FCC to expand a process we developed in 2008 to decrease the number of very old delinquent Part 4s that were being carried over month after month and made up 31% of our reclamation list. On June 18, 2009, the PA received authority from the FCC to allow carriers whose Part 4 due dates *pre-dated* January 1, 2008, to sign a “Certification in Lieu of Part 4” attesting that the affected blocks are indeed in service. The document would then be forwarded to the appropriate regulatory agency for approval. Any block for which we received a completed and approved certification would then be removed from the reclamation list and PAS data would be changed to reflect that a Part 4 had been filed.

The process, which included notifications to the affected states and carriers, reduced the relevant delinquencies from 324 blocks to 42 by the end of 2009. Of the 324 blocks, only nine were reclaimed. The rest were certified as in-service by the carrier.

### **2.8.4 One-Time NPAC/PAS data Scrub Following Implementation of Change Order 5**

As part of our Change Order 5 solution we agreed that once we implemented the changes in PAS necessary to check the block contamination levels on returned blocks with the NPAC, we would perform a manual one-time data scrub similar to one we completed in 2006.

We began validation of the contamination level of all available blocks in PAS in August by comparing the PAS data against the

Number Portability Administration Center (NPAC) database to ensure that the contamination status of each available block was accurate. The initial report from the NPAC indicated that 9,949 blocks were either over contaminated, had LRNs associated with them, or had conflicting data in the PAS and NPAC. Determining which data was accurate, correcting the information in the appropriate database, attempting to find block-holders for over-contaminated blocks, and resolving issues required working closely with SPs through emails and telephone contacts.

We sent over 2,000 emails in an effort to just resolve over-contamination issues. As of December 31, we still had over 600 blocks that were over-contaminated and in need of a new block holder.

## 2.9 Customer Focus

The PA is constantly focused on customer satisfaction. We strive to respond affirmatively to our customers' questions and suggestions for improvement, while meeting or exceeding contract requirements. Since 2006, we have provided the Numbering Oversight Working Group (NOWG) with an ongoing list of noteworthy specific ways we have responded to the more significant requests of our customers. This list does not include all the day-to-day questions and requests that the pooling staff members field as part of their daily workload. In 2009, we had 67 of these customer focus items.

Another strong indication of our firm commitment to customer satisfaction is that we did not receive any formal complaints in 2009. Others include:

- ★ Processing 100% of Applications on Time

According to Section 7.4.4 of the Thousands-Block Pooling Administration Guidelines we are required to process applications within seven calendar days and per Section 5.0 of Clause C.1 of our requirements, we have met our requirement as long as 97% of the applications are processed within the seven-day timeframe. We have not missed the requirement for processing applications within the seven-day timeframe since the beginning of our new contract in August, 2007, and have always exceeded the performance goal of 97%. Based on the number of Part 3s processed in 2009, the PA could have missed the seven-day processing deadline for over 2,600 applications while still meeting our contractual requirement. Instead we exceeded the requirement by processing 100% of the applications on time.

- ★ Issuing Tips-of-the-Month

We continue to send the *Tip of the Month* to our PAS email distribution each month to help our customers understand pooling administration processes.

- ★ PAS 100% up-time

Another area that shows our strong concentration on customer support is our PAS maintenance and builds. Although our contract permits us to make the system unavailable to our customers during maintenance of the PAS, we work diligently to ensure that we complete the updates and builds with little to no down time. The contract requirements permit up to nine hours of unscheduled maintenance and up to 24 hours of scheduled maintenance of the PAS in any 12 month period. In 2009, customers experienced 100% availability of the PAS, 24 hours a day, seven days a week,



even during the PAS builds which are described in more detail in *Section 6.4*.

★ The Very Old Overdue Part 4s project

During 2009, we also pro-actively increased our focus on reducing the number of overdue Part 4s that are carried over each month, which benefits both service providers and regulators. In 2008, we had 22,013 blocks on the cumulative list of overdue Part 4s. In 2009, we reduced that number by 55% to 9,939 by using the very old overdue Part 4s process. (See *Section 2.2.3* for more detail.)

★ The Non-Participating Carriers Project

The special project regarding carriers not participating in pooling in mandatory

pooling rate centers has already returned **19** codes and **653** thousands blocks, and reclamation efforts are ongoing. See *Section 2.8.1* for more detail)

★ Exceeding reporting requirements for responding to requests for Ad Hoc Reports

Finally, the PA has specific timeframes for reporting, as detailed in Tables 2-21 and 2-22. Not only do we submit all of our reports on time, but we generally respond to requests for ad hoc reports within less than 24 hours of the request rather than taking the permitted three business days to respond.

## Section 3 - Identification of Existing and Potential Pooling Areas

In this section, Pooling Administration summarizes the number of existing pooling areas. Currently, 78.4% of the 18,597 distinct rate areas are designated as areas available for pooling. While we do not include a distinct list of separate “potential” pooling areas, there are currently 4,023 rate areas in which no carrier is pooling, and which could therefore be considered “potential” pooling areas. (See Section 3.2)

The PA designates each rate area according to one of the following definitions:

- 1. Mandatory (M)** - This rate center is located in a top 100 MSA and service providers with numbering resources in this rate center that have not been granted a specific exemption must pool in this rate center.
- 2. Mandatory State (M)** - Pooling was implemented in this rate center pursuant to a state commission order. This rate center is not in a top 100 MSA, but has one or more pooling-capable service providers, and is considered a mandatory pooling rate center.
- 3. Mandatory Single Service Provider (M\*)** - This rate center is located in a top 100 MSA, but has only one service provider that has numbering resources. This rate center will be considered optional under these conditions and designated as M\*. When a second service provider receives numbering resources in this rate center, the designation will be changed to M for

Mandatory.

- 4. Mandatory State Single Service Provider (M\*)** - Pooling has been implemented in this rate center pursuant to a state commission order. This rate center is not in a top 100 MSA and has only one service provider that has numbering resources. This rate center will be considered optional under these conditions and designated as M\*. When a second service provider receives numbering resources in this rate center, the designation will be changed to M for Mandatory State.
- 5. Optional (O)** - This rate center is not in a top 100 MSA and any service provider with numbering resources in this rate center may elect to pool at its option. Service providers may voluntarily participate in thousands-block number pooling in an Optional rate center outside the top 100 MSAs.
- 6. Excluded (X)** - This rate center is not in a top 100 MSA and no service provider is currently participating in pooling. This rate center is not included in the Pooling Administration System. To begin pooling in an excluded rate center, please contact the Customer Support Desk at 866-neu-pool (866-638-7665) or [poolingsupport@neustar.biz](mailto:poolingsupport@neustar.biz) for assistance.

### 3.1 Identification of existing pooling areas

The chart below identifies the 14,574 pooling areas (i.e., distinct rate areas), and their status designation, by state, as of December 31, 2009. A pooling area is defined as either “mandatory” or “optional.” Rate areas with a designation of “excluded” are not considered pooling areas.

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory State (M)</i>	<i>Mandatory Single SP (M*)</i>	<i>Mandatory State Single SP (M*)</i>	<i>Optional (O)</i>	<i>Total</i>
AK	0	0	0	0	43	43
AL	63	69	6	17	103	258
AR	34	0	13	0	154	201
AZ	26	0	21	0	32	79
CA	439	83	15	0	176	713
CO	21	5	5	0	134	165
CT	70	19	0	0	0	89
DC	1	0	0	0	0	1
DE	8	0	0	0	22	30
FL	120	25	1	0	96	242
GA	73	0	6	0	136	215
HI	1	0	0	0	5	6
IA	70	52	39	0	388	549
ID	14	66	5	61	0	146
IL	214	0	40	0	501	755
IN	206	74	16	0	176	472
KS	56	0	30	0	258	344
KY	42	119	5	44	135	345
LA	54	0	7	0	146	207
MA	234	30	0	0	0	264
MD	112	53	0	0	0	165
ME	39	101	11	0	59	210
MI	206	112	8	14	228	568
MN	38	0	6	0	196	240
MO	137	379	21	184	0	721
MS	33	0	6	0	155	194
MT	0	0	0	0	120	120
NC	132	24	6	0	200	362
ND	0	0	0	0	71	71
NE	25	98	7	151	178	459
NH	32	92	0	0	25	149
NJ	187	0	1	0	21	209

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory State (M)</i>	<i>Mandatory Single SP (M*)</i>	<i>Mandatory State Single SP (M*)</i>	<i>Optional (O)</i>	<i>Total</i>
NM	12	0	3	0	52	67
NV	21	0	4	0	38	63
NY	401	243	1	20	83	748
OH	361	161	11	14	137	684
OK	97	15	44	0	154	310
OR	35	103	1	0	47	186
PA	415	97	0	0	264	776
PR	48	0	1	0	36	85
RI	25	0	0	0	0	25
SC	83	0	24	0	95	202
SD	0	0	0	0	75	75
TN	103	0	6	0	166	275
TX	283	7	41	0	557	888
UT	27	0	9	1	36	73
VA	119	184	0	0	20	323
VT	0	101	0	0	40	141
WA	56	149	4	29	1	239
WI	111	239	17	104	131	602
WV	7	148	0	8	3	166
WY	0	0	0	0	54	54
<b>Grand Total</b>	<b>4,891</b>	<b>2,848</b>	<b>441</b>	<b>647</b>	<b>5,747</b>	<b>14,574</b>

### 3.2 Summary by state of “potential” pooling areas

The chart below sets forth the breakdown by state of the 4,023 rate areas that were designated as “excluded” from pooling as of December 31, 2009 and could be considered “potential” pooling areas. These rate areas are not presently available for pooling in PAS, but can be made available at the request of a service provider or a state. This chart does not include any rate areas designated as “mandatory” or “optional.”

<i>State</i>	<i>Excluded (X)</i>
AK	238
AL	52

<i>State</i>	<i>Excluded (X)</i>
AR	181
AZ	51
CA	26
CO	46
CT	0
DC	0
DE	0
FL	39
GA	145
HI	0
IA	268
ID	0
IL	231
IN	54
KS	230
KY	27
LA	71

<i>State</i>	<i>Excluded (X)</i>
MA	2
MD	0
ME	39
MI	66
MN	403
MO	0
MS	45
MT	140
NC	69
ND	229
NE	0
NH	0
NJ	0
NM	96
NV	33
NY	0
OH	55

<i>State</i>	<i>Excluded (X)</i>
OK	220
OR	68
PA	0
PR	0
RI	0
SC	38
SD	198
TN	66
TX	389
UT	62
VA	46
VT	0
WA	0
WI	0
WV	62
WY	38

### 3.3 Summarized Information About Existing and “Potential” Pooling Areas

#### 3.3.1 Pooling Rate Area Facts:

<b>Total Number of Distinct Rate Areas</b>	<b>18,597</b>
<b>Total Number of Distinct Rate Areas Available for Pooling</b>	<b>14,574</b>
<b>Percentage of Distinct Rate Areas that are Available for Pooling</b>	<b>78.4%</b>
<b>Total Number of Mandatory Distinct Rate Areas</b>	<b>7,739</b>
<b>Percentage of Distinct Rate Areas that are Mandatory</b>	<b>41.6%</b>
<b>Total Number of Distinct Mandatory Single-Service Provider Rate Areas</b>	<b>1,088</b>
<b>Percentage of Distinct Rate Areas that are Mandatory Single-Service Provider</b>	<b>5.9%</b>
<b>Total Number of Distinct Optional Rate Areas</b>	<b>5,747</b>
<b>Percentage of Distinct Rate Areas that are Optional</b>	<b>30.9%</b>
<b>Total Number of Distinct Rate Areas Excluded from Pooling</b>	<b>4,023</b>
<b>Percentage of Distinct Rate Areas that are Excluded from Pooling</b>	<b>21.6%</b>
<b>Total Number of Rate Center Designations Changed in 2009 (see Section 2.4.2 for detail)</b>	<b>348</b>

### 3.3.2 Summary of State/Jurisdiction Pooling Status

<b>States or jurisdictions where number pooling has been implemented.</b>	All states, the District of Columbia and Puerto Rico
<b>States or jurisdictions that have only mandatory pooling areas.</b>	Connecticut, District of Columbia, Idaho, Maryland, Massachusetts, Missouri, and Rhode Island
<b>States that have zero mandatory pooling areas.</b>	Alaska, Montana, North Dakota, South Dakota, and Wyoming
<b>States or jurisdictions that have zero excluded rate areas.</b>	Connecticut, Delaware, District of Columbia, Hawaii, Idaho, Maryland, Missouri, Nebraska, New Hampshire, New Jersey, New York, Pennsylvania, Puerto Rico, Rhode Island, Vermont, Washington, and Wisconsin
<b>States or jurisdictions that implemented additional mandatory pooling prior to December 31, 2009 either under delegated authority for state pooling trials prior to the rollout of national pooling, or as a result of additional delegated authority after the national rollout.</b>	Alabama, California, Colorado, Connecticut, Florida, Idaho, Iowa, Indiana, Kentucky, Massachusetts, Maryland, Maine, Michigan, Missouri, North Carolina, Nebraska, New Hampshire, New York, Ohio, Oklahoma, Oregon, Pennsylvania, Texas, Utah, Virginia, Vermont, Washington, West Virginia, and Wisconsin

### 3.3.3. Complete Summary of all Rate Areas by Status Designation

The following chart combines the information contained in Sections 3.1 and 3.2. It summarizes the total for each status designation for all 18,597 rate areas in each state by its pooling status designation (mandatory, optional, or excluded) as of December 31, 2009.

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory State (M)</i>	<i>Mandatory Single SP (M*)</i>	<i>Mandatory State Single SP (M*)</i>	<i>Optional (O)</i>	<i>Excluded (X)</i>	<i>Total</i>
AK			43			238	281
AL	63	69	103	6	17	52	310
AR	34		154	13		181	382
AZ	26		32	21		51	130
CA	439	83	176	15		26	739
CO	21	5	134	5		46	211
CT	70	19					89
DC	1						1
DE	8		22				30
FL	120	25	96	1		39	281
GA	73		136	6		145	360
HI	1		5				6

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory State (M)</i>	<i>Mandatory Single SP (M*)</i>	<i>Mandatory State Single SP (M*)</i>	<i>Optional (O)</i>	<i>Excluded (X)</i>	<i>Total</i>
IA	70	52	388	39		268	817
ID	14	66		5	61		146
IL	214		501	40		231	986
IN	206	74	176	16		54	526
KS	56		258	30		230	574
KY	42	119	135	5	44	27	372
LA	54		146	7		71	278
MA	234	30				2	266
MD	112	53					165
ME	39	101	59	11		39	249
MI	206	112	228	8	14	66	634
MN	38		196	6		403	643
MO	137	379		21	184		721
MS	33		155	6		45	239
MT			120			140	260
NC	132	24	200	6		69	431
ND			71			229	300
NE	25	98	178	7	151		459
NH	32	92	25				149
NJ	187		21	1			209
NM	12		52	3		96	163
NV	21		38	4		33	96
NY	401	243	83	1	20		748
OH	361	161	137	11	14	55	739
OK	97	15	154	44		220	530
OR	35	103	47	1		68	254
PA	415	97	264				776
PR	48		36	1			85
RI	25						25
SC	83		95	24		38	240
SD			75			198	273
TN	103		166	6		66	341
TX	283	7	557	41		389	1277
UT	27		36	9	1	62	135
VA	119	184	20			46	369
VT		101	40				141
WA	56	149	1	4	29		239
WI	111	239	131	17	104		602
WV	7	148	3		8	62	228
WY			54			38	92
Grand Total	4891	2848	5747	441	647	4023	18597

## Section 4 - Aggregated Total by Pool of the Service Providers Participating in the Pooled Areas

Following is a summary of the aggregated total by pool of the service providers participating in the pooled areas in 2009. There are 2,406 distinct service providers<sup>3</sup> participating in 14,574 distinct pooled areas in 242 NPA complexes<sup>4</sup> covering 52 jurisdictions -- 50 states, the District of Columbia, and Puerto Rico.

<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
201/551	46	22
202	38	1
203/475	35	32
205	33	62
206	39	5
207	50	210
208	43	146
209	37	55
210	33	1
212/646/917	44	1
213	46	3
214/469/972	56	43
215/267	49	36
216	29	4
217	35	194
218	35	58
219	32	45
224/847	42	42
225	31	34
228	23	11

<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
229	28	32
231	35	78
234/330	38	105
239	25	14
240/301	58	63
248/947	47	20
251	37	37
252	31	65
253	37	13
254	37	67
256/938	40	91
260	27	74
262	34	60
269	48	76
270	48	170
276	34	70
281/713/832	54	45
302	38	30
303/720	38	16
304/681	37	167
305	28	1
305/786	47	4
307	23	54
308	15	178
309	32	84
310/424	45	16
312/872	38	1
313	38	6
314	29	7
315	41	149
316	26	14
317	34	36
318	27	73
319	28	91
320	35	59
321	26	5
321/407	42	17

<sup>3</sup> Distinct Operating Company Numbers (OCNs) that have at least one assigned or retained block in PAS.

<sup>4</sup> The term "NPA Complex" is used because in some rate areas there are multiple NPAs serving one geographic area.



<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>	<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
323	43	12	501	29	51
325	23	55	502	32	35
331/630	37	25	503/971	42	57
334	36	68	504	29	5
336	52	76	505	31	27
337	31	53	507	37	93
339/781	33	40	508/774	38	85
347/718	32	2	509	49	130
347/718/917	43	11	510	36	13
351/978	35	58	512	44	34
352	31	46	513	31	25
360	58	77	515	37	76
361	31	63	516	40	12
385/801	31	23	517	55	76
386	36	22	518	34	135
401	23	25	520	31	27
402	55	281	530	41	115
404/678	50	1	540	44	94
405	36	82	559	30	57
406	22	120	561	39	7
408	43	11	562	43	9
409	30	39	563	24	75
410/443	52	102	570	42	180
412/878	33	23	571/703	47	19
413	31	61	573	38	216
414	24	4	574	30	48
415	45	14	575	24	40
417	33	155	580	27	107
419/567	43	162	585	34	77
423	46	64	586	37	11
425	37	14	601/769	43	76
430/903	44	139	602	28	1
432	18	36	603	40	149
434	32	51	605	19	75
435	34	50	606	29	98
440	38	62	607	25	105
442/760	53	83	608	43	159
458/541	44	129	609	40	39
478	32	27	612	38	1
479	25	43	614	34	16
480	31	1	615	37	49
484/610	57	90	616	46	36

<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>	<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
617/857	37	20	779/815	48	167
618	43	199	785	35	148
619	43	11	787/939	14	85
620	41	152	802	19	141
623	27	1	803	53	68
626	45	10	804	28	55
631	36	53	805	50	40
636	29	46	806	29	74
641	35	149	808	15	6
650	36	15	810	38	47
651	42	11	812	45	146
657/714	45	13	813	37	8
660	29	224	814	41	178
661	48	32	816	36	73
662	43	107	828	37	68
678/770	55	41	830	43	79
682/817	56	24	831	33	24
701	27	71	843	41	74
702	29	16	845	49	96
704/980	45	53	850	38	48
706/762	63	85	856	39	32
707	41	75	858	35	8
708	36	32	859	38	42
712	41	158	860	32	57
715	66	253	862/973	49	42
716	36	79	863	33	23
717	41	107	864	37	60
719	32	55	865	32	30
724/878	50	162	870	27	107
727	35	5	901	29	14
731	30	56	904	33	18
732/848	37	36	906	14	50
734	49	33	907	5	43
740	47	187	908	41	38
747/818	44	16	909	44	21
754/954	42	5	910	32	64
757	29	34	912	35	29
763	47	11	913	34	31
765	43	123	914	41	28
772	33	8	915	27	7
773/872	35	10	916	45	16
775	34	47	918	39	121

<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
919	39	36
920	55	126
925	35	17
928	30	49
931	37	62
936	30	43
937	40	123
940	45	61
941	40	11
949	42	7
951	44	20

<i>NPA Complex</i>	<i>Pooling OCNs</i>	<i>Pooled RCs</i>
952	41	7
956	29	30
970	33	94
979	29	47
985	31	42
989	49	135

## Section 5 - Forecast Results and a Review of Forecasts versus Actual Block Activation in the Past

This section identifies forecast results by NPA, and as specifically required by the contract, contains a review of forecasts compared to actual block assignments for the current year and the previous years. In summary for 2009, there were:

- 242 NPA complexes;
- 7,581 distinct rate areas with forecasts;
- 88,920 forecasted blocks;
- 34,364 blocks assigned; and
- 39% of the forecasted blocks were assigned.

### 5.1 Forecasted Versus Actual Block Assignments by NPA for 2009

The table below shows that 88,920 blocks were forecasted and 34,364 blocks were assigned in 242 NPA complexes during the 2009 calendar year. This resulted in 39% of the forecasted blocks being assigned. Carriers forecasted a need for blocks in 7,581 pooling rate areas out of the 14,574 pooling rate areas, or in 52% of them. This means that in 6,993 pooling rate areas, no blocks were forecasted during 2009. When compared with 2008, the number of blocks assigned decreased 28% while the number of blocks forecasted decreased 24% in 2009. The Connecticut 860 NPA had the lowest percentage of blocks assigned compared to total forecast, at 12%, while the Montana 406 NPA had the highest compared percentage at 87%.

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
201/551	NJ	606	148	24%
202	DC	312	179	57%
203/475	CT	745	130	17%
205	AL	536	256	48%
206	WA	327	90	28%
207	ME	441	135	31%
208	ID	206	112	54%
209	CA	395	134	34%
210	TX	312	175	56%
212/646/917	NY	720	279	39%
213	CA	114	53	46%
214/469/972	TX	683	385	56%
215/267	PA	1238	564	46%
216	OH	251	169	67%
217	IL	404	62	15%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
218	MN	120	54	45%
219	IN	323	57	18%
224/847	IL	1208	279	23%
225	LA	176	115	65%
228	MS	99	14	14%
229	GA	222	96	43%
231	MI	175	94	54%
234/330	OH	443	216	49%
239	FL	381	70	18%
240/301	MD	840	320	38%
248/947	MI	479	147	31%
251	AL	229	89	39%
252	NC	258	129	50%
253	WA	337	87	26%
254	TX	156	78	50%
256	AL	468	201	43%
260	IN	202	68	34%
262	WI	231	68	29%
269	MI	386	164	42%
270	KY	270	108	40%
276	VA	175	83	47%
281/713/832	TX	1189	611	51%
302	DE	366	221	60%
303/720	CO	637	365	57%
304/681	WV	493	192	39%
305	FL	45	37	82%
305/786	FL	535	269	50%
307	WY	83	49	59%
308	NE	52	26	50%
309	IL	330	62	19%
310/424	CA	339	196	58%
312/872	IL	261	81	31%
313	MI	416	151	36%
314	MO	202	73	36%
315	NY	243	144	59%
316	KS	133	71	53%
317	IN	311	158	51%
318	LA	200	96	48%
319	IA	80	46	58%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
320	MN	70	28	40%
321	FL	132	82	62%
321/407	FL	385	197	51%
323	CA	344	162	47%
325	TX	103	30	29%
331/630	IL	754	188	25%
334	AL	272	131	48%
336	NC	462	243	53%
337	LA	163	89	55%
339/781	MA	513	138	27%
347/718	NY	449	100	22%
347/718/917	NY	2887	732	25%
351/978	MA	626	192	31%
352	FL	380	151	40%
360	WA	638	164	26%
361	TX	293	140	48%
385/801	UT	610	199	33%
386	FL	183	71	39%
401	RI	152	72	47%
402	NE	235	150	64%
404/678	GA	520	292	56%
405	OK	254	115	45%
406	MT	111	97	87%
408	CA	482	140	29%
409	TX	169	68	40%
410/443	MD	820	337	41%
412/878	PA	451	161	36%
413	MA	420	117	28%
414	WI	209	72	34%
415	CA	464	176	38%
417	MO	272	92	34%
419/567	OH	530	230	43%
423	TN	447	211	47%
425	WA	423	88	21%
430/903	TX	500	264	53%
432	TX	93	37	40%
434	VA	178	86	48%
435	UT	170	49	29%
440	OH	356	212	60%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
442/760	CA	394	154	39%
478	GA	174	74	43%
479	AR	147	74	50%
480	AZ	253	152	60%
484/610	PA	817	303	37%
501	AR	271	104	38%
502	KY	177	100	56%
503/971	OR	559	209	37%
504	LA	187	132	71%
505	NM	368	117	32%
507	MN	114	55	48%
508/774	MA	1045	210	20%
509	WA	344	121	35%
510	CA	473	152	32%
512	TX	344	210	61%
513	OH	284	168	59%
515	IA	140	75	54%
516	NY	313	109	35%
517	MI	395	148	37%
518	NY	244	119	49%
520	AZ	268	142	53%
530	CA	409	143	35%
540	VA	527	242	46%
541	OR	359	100	28%
559	CA	413	135	33%
561	FL	366	135	37%
562	CA	170	107	63%
563	IA	40	22	55%
570	PA	1178	355	30%
571/703	VA	725	339	47%
573	MO	367	87	24%
574	IN	313	45	14%
575	NM	188	54	29%
580	OK	117	60	51%
585	NY	333	217	65%
586	MI	329	113	34%
601/769	MS	567	129	23%
602	AZ	214	111	52%
603	NH	431	81	19%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
605	SD	134	87	65%
606	KY	112	64	57%
607	NY	168	95	57%
608	WI	144	61	42%
609	NJ	561	201	36%
612	MN	87	28	32%
614	OH	334	177	53%
615	TN	604	293	49%
616	MI	382	173	45%
617/857	MA	668	235	35%
618	IL	463	141	30%
619	CA	239	120	50%
620	KS	137	80	58%
623	AZ	106	76	72%
626	CA	144	96	67%
631	NY	521	233	45%
636	MO	197	68	35%
641	IA	43	17	40%
650	CA	438	120	27%
651	MN	155	58	37%
657/714	CA	310	185	60%
660	MO	141	29	21%
661	CA	164	96	59%
662	MS	471	84	18%
678/770	GA	990	371	37%
682/817	TX	408	196	48%
701	ND	90	32	36%
702	NV	301	135	45%
704/980	NC	531	292	55%
706/762	GA	734	321	44%
707	CA	518	193	37%
708	IL	661	160	24%
712	IA	72	48	67%
715	WI	286	100	35%
716	NY	379	245	65%
717	PA	983	214	22%
719	CO	236	99	42%
724/878	PA	694	220	32%
727	FL	192	109	57%



<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
731	TN	178	45	25%
732/848	NJ	577	123	21%
734	MI	372	131	35%
740	OH	405	156	39%
747/818	CA	220	145	66%
754/954	FL	459	208	45%
757	VA	363	212	58%
763	MN	265	148	56%
765	IN	399	106	27%
772	FL	199	56	28%
773/872	IL	1022	380	37%
775	NV	108	48	44%
779/815	IL	882	173	20%
785	KS	251	79	31%
787/939	PR	822	248	30%
802	VT	390	106	27%
803	SC	557	244	44%
804	VA	427	206	48%
805	CA	205	130	63%
806	TX	173	61	35%
808	HI	123	37	30%
810	MI	407	117	29%
812	IN	345	91	26%
813	FL	315	146	46%
814	PA	931	300	32%
816	MO	282	105	37%
828	NC	216	91	42%
830	TX	152	87	57%
831	CA	221	69	31%
843	SC	451	194	43%
845	NY	366	153	42%
850	FL	418	141	34%
856	NJ	491	164	33%
858	CA	123	67	54%
859	KY	152	79	52%
860	CT	793	94	12%
862/973	NJ	601	195	32%
863	FL	223	95	43%
864	SC	344	171	50%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
865	TN	322	161	50%
870	AR	143	67	47%
901	TN	314	164	52%
904	FL	258	120	47%
906	MI	64	26	41%
907	AK	37	13	35%
908	NJ	359	74	21%
909	CA	257	166	65%
910	NC	482	232	48%
912	GA	332	109	33%
913	KS	178	90	51%
914	NY	534	101	19%
915	TX	146	69	47%
916	CA	590	148	25%
918	OK	285	140	49%
919	NC	508	245	48%
920	WI	247	107	43%
925	CA	370	86	23%
928	AZ	143	61	43%
931	TN	451	203	45%
936	TX	126	59	47%
937	OH	279	149	53%
940	TX	102	51	50%
941	FL	340	92	27%
949	CA	179	116	65%
951	CA	194	144	74%
952	MN	167	58	35%
956	TX	316	180	57%
970	CO	308	112	36%
979	TX	134	69	51%
985	LA	153	72	47%
989	MI	316	165	52%

## 5.2 NPAs/States with Forecasted-Versus-Actual Blocks Assigned Below 25%

Table 5-2 below shows that there were 25 NPA complex areas where fewer than 25% of the blocks forecasted were assigned in 2009.

**Table 5-2**  
**NPAs/States with forecasted versus actual blocks assigned under 25%**

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
860	CT	793	94	12%
228	MS	99	14	14%
574	IN	313	45	14%
217	IL	404	62	15%
203/475	CT	745	130	17%
219	IN	323	57	18%
662	MS	471	84	18%
239	FL	381	70	18%
309	IL	330	62	19%
603	NH	431	81	19%
914	NY	534	101	19%
779/815	IL	882	173	20%
508/774	MA	1045	210	20%
660	MO	141	29	21%
908	NJ	359	74	21%
425	WA	423	88	21%
732/848	NJ	577	123	21%
717	PA	983	214	22%
347/718	NY	449	100	22%
601/769	MS	567	129	23%
224/847	IL	1208	279	23%
925	CA	370	86	23%
573	MO	367	87	24%
708	IL	661	160	24%
201/551	NJ	606	148	24%

**5.3. NPA/States with Forecasted Versus Actual Blocks Assigned Above 50%**

Table 5-3 below shows that there were 76 NPA complex areas where the ratio between blocks forecasted and blocks assigned was above 50% in 2009. Of those, two were over 75%.

**Table 5-3**  
**NPA/States with forecasted versus actual blocks assigned above 50%**

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
406	MT	111	97	87%
305	FL	45	37	82%
951	CA	194	144	74%
623	AZ	106	76	72%
504	LA	187	132	71%
216	OH	251	169	67%
626	CA	144	96	67%
712	IA	72	48	67%
747/818	CA	220	145	66%
225	LA	176	115	65%
585	NY	333	217	65%
605	SD	134	87	65%
949	CA	179	116	65%
716	NY	379	245	65%
909	CA	257	166	65%
402	NE	235	150	64%
805	CA	205	130	63%
562	CA	170	107	63%
321	FL	132	82	62%
512	TX	344	210	61%
302	DE	366	221	60%
480	AZ	253	152	60%
657/714	CA	310	185	60%
440	OH	356	212	60%
315	NY	243	144	59%
513	OH	284	168	59%
307	WY	83	49	59%
661	CA	164	96	59%
757	VA	363	212	58%
620	KS	137	80	58%
310/424	CA	339	196	58%
319	IA	80	46	58%
202	DC	312	179	57%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
303/720	CO	637	365	57%
830	TX	152	87	57%
606	KY	112	64	57%
956	TX	316	180	57%
727	FL	192	109	57%
607	NY	168	95	57%
502	KY	177	100	56%
214/469/972	TX	683	385	56%
404/678	GA	520	292	56%
210	TX	312	175	56%
763	MN	265	148	56%
563	IA	40	22	55%
704/980	NC	531	292	55%
337	LA	163	89	55%
858	CA	123	67	54%
208	ID	206	112	54%
231	MI	175	94	54%
515	IA	140	75	54%
937	OH	279	149	53%
316	KS	133	71	53%
614	OH	334	177	53%
520	AZ	268	142	53%
430/903	TX	500	264	53%
336	NC	462	243	53%
901	TN	314	164	52%
989	MI	316	165	52%
859	KY	152	79	52%
602	AZ	214	111	52%
979	TX	134	69	51%
281/713/832	TX	1189	611	51%
580	OK	117	60	51%
321/407	FL	385	197	51%
317	IN	311	158	51%
913	KS	178	90	51%
479	AR	147	74	50%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Forecasted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
305/786	FL	535	269	50%
619	CA	239	120	50%
252	NC	258	129	50%
254	TX	156	78	50%
308	NE	52	26	50%
865	TN	322	161	50%
940	TX	102	51	50%
864	SC	344	171	50%

**5.4. Analysis of forecasted-versus-actual-blocks-assigned percentage since 2005**

For the five years since 2005, the forecasted-versus-actual-blocks-assigned percentage in 2009 ranks third highest. The volumes of both assigned blocks and forecasted blocks were down significantly from previous years, but the ratio of assigned blocks to forecasted blocks remains in a range near 40%.

The significance of the forecasting versus blocks assigned percentage disparity will typically be reflected in the PA’s NRUF submission to NANPA which is based on service provider forecasts compared to the resources available in the pools. The NANPA uses these forecasts in calculating NPA exhaust projections.

The following chart illustrates the ratio between forecasts and actual assigned blocks from 2005 through 2009 ranked from highest percentage to lowest.

<i>Rank from highest to lowest</i>	<i>Year</i>	<i>Total Forecasted Blocks</i>	<i>Total Blocks Assigned</i>	<i>Percentage of Assigned/Forecasted Blocks</i>
1	2006	147,370	62,606	42.5
2	2008	116,843	47,898	41.0
3	2009	88,920	34,364	38.6
4	2007	144,197	46,796	32.4
5	2005	197,878	55,990	28.3

## Section 6 - System and Performance Metrics

### 6.1 Pooling Administration System Performance in 2009

The Pooling Administration System (PAS) is the nucleus of our operation and is extremely important to our customers. PAS stores all of the information relating to thousands-block administration and provides many essential reporting features that generally contain real-time data.

Section 3.3 of *Clause C.1: Performance Work Statement/Technical Requirements* states that the pooling system shall, at a minimum, adhere to the following availability and reliability requirements:

1. Available 24 hours a day, 7 days a week.
2. Availability shall meet or exceed 99.9% of scheduled uptime.
3. Unscheduled maintenance downtime in any 12-month interval shall be less than nine (9) hours.
4. The mean time to repair (MTTR) for all unscheduled downtime in any 12-month interval shall be less than one hour during core business hours and four (4) hours for non-core business hours.
5. Scheduled maintenance downtime in any 12-month interval shall be less than 24 hours.

In 2009, PAS was available for use 100% of the time, seven (7) days a week, 24 hours per day and far exceeded the contract performance metric of 99.9%.

Table 6-1 summarizes PAS system performance in 2009.

**Table 6-1**  
**Summary of PAS Performance in 2009**

<i>Month</i>	<i>Number of Possible Scheduled Available Hours</i>	<i>Number of Hours Available</i>	<i>Percent Scheduled Hours Available</i>
January	744	744	100
February	672	672	100
March	744	744	100
April	720	720	100
May	744	744	100
June	720	720	100
July	744	744	100
August	744	744	100

<i>Month</i>	<i>Number of Possible Scheduled Available Hours</i>	<i>Number of Hours Available</i>	<i>Percent Scheduled Hours Available</i>
September	720	720	100
October	744	744	100
November	720	720	100
December	744	744	100

## 6.2 PAS Performance Metrics

In 2009, as outlined in Table 6-2, the PAS consistently exceeded the required performance metrics as set forth in Clause C.1, Section 5.0 of the Contract:

Table 6-2

### PAS PERFORMANCE METRICS

REQUIRED SERVICE	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL	ACCOMPLISHMENT
PAS Availability (See PWS 3.3)	Pooling Administration System is available	99.9%	<b>FAR EXCEEDED THE REQUIREMENT WITH ACTUAL AVAILABILITY LEVEL OF 100%</b>
Maintenance (See PWS 3.3)	Unscheduled maintenance of the PAS is less than 9 hours in any 12 month period	100%	<b>THERE WAS <u>NO</u> DOWNTIME AS A RESULT OF UNSCHEDULED MAINTENANCE OF THE PAS IN 2009</b>
Maintenance (See PWS 3.3)	Scheduled maintenance of the PAS is less than 24 hours in any 12 month period	100%	<b>THERE WAS <u>NO</u> DOWNTIME AS A RESULT OF SCHEDULED MAINTENANCE DURING 2009</b>

## 6.3 PAS Performance from 2005 through 2009

Table 6-3 provides actual availability numbers for the PAS from 2005 through 2009. In each year, the PAS availability far exceeded the requirement of 99.9%.



**Table 6-3**  
**PAS Performance from 2005 through 2009**

<i>YEAR</i>	<i>PERCENT OF ACTUAL AVAILABILITY</i>
<b>2005</b>	<b>99.996%</b>
<b>2006</b>	<b>100%</b>
<b>2007</b>	<b>99.998%</b>
<b>2008</b>	<b>99.997%</b>
<b>2009</b>	<b>100%</b>

#### 6.4 PAS Updates in 2009

In 2009, there were four PAS builds, of which three were related to change orders and one was for system maintenance. Customers experienced no PAS unavailability as a result of our implementation of these updates.

**Table 6-4**  
**PAS Updates Resulting from Change Orders**

<b>DATE</b>	<b>CHANGE ORDER/S</b>	<b>CHANGES MADE TO PAS</b>
January 23	3	<ul style="list-style-type: none"> <li>• Added new validations for the submission of block donations.</li> <li>• Modified the Part 1A Report to also include Part 1s for code modification and code disconnect requests.</li> <li>• Renamed the Part 1A report to Part 1/1A Report.</li> <li>• Modified the Block Report to include a new “Code Holder” column.</li> <li>• Changed the font for password resets to make it more legible.</li> <li>• Modified the process for submission of Part 4s to allow for multiple Part 4s to be submitted at one time.</li> </ul>
May 15	6 and 8	<ul style="list-style-type: none"> <li>• Added a new standard verbiage to the Part 3 remarks section for new block assignments.</li> <li>• Provided the ability for SP/SPC users to delete saved work items.</li> <li>• Allowed for multiple switches to be entered for new block and new code requests.</li> <li>• Added a new function to allow SP/SPC users to</li> </ul>

DATE	CHANGE ORDER/S	CHANGES MADE TO PAS
		withdraw pending requests. <ul style="list-style-type: none"> <li>• Created a new Overdue part 4 Reminder to be sent to service provider and service provider consultant users.</li> </ul>
July 24	5 and 7	<ul style="list-style-type: none"> <li>• Added an automatic suspension by PAS for all block disconnects where the reported contamination level is less than 10%.</li> <li>• Added the ability for the PA to check porting information on all block returns.</li> <li>• Added the ability for the PA to accept requests for mass modifications including changes to the Part 1B form.</li> </ul>

For further details on the changes made to PAS as a result of the change orders, see Table 2-13 in Section 2.

On October 16, we completed a PAS build for general system maintenance and to resolve issues related to an outstanding trouble ticket.

### 6.5 Disaster Recovery Testing

The PA successfully completed technical disaster recovery testing on October 8, 2009 with no PAS downtime. Testing included a complete server rebuild designed to test Neustar’s ability to rebuild a server with the correct PAS Operating System and Applications in the event of a catastrophic failure.

## **Section 7 - Status of Required Transferable Property**

NeuStar Pooling Administration Services affirms that all equipment defined in the annual inventory report required by the contract is considered transferable property, and is available for transfer upon direction from the FCC. The transferable property inventory report is updated, reviewed, and certified quarterly with the FCC Property Management Division and all transferable property is appropriately labeled with FCC asset tags.

## Section 8 - Industry Issue Identification/Feedback

The PA works with the industry through several channels during the year, including participation in the North American Numbering Council (NANC) meetings, interaction with the Numbering Oversight Working Group (NOWG), participation in industry forums, and interaction with individual service providers. This section contains information on the industry forums in which the PA participated, and the issues that the PA submitted, as well as the feedback the PA received from the NOWG for 2009.

### 8.1 North American Numbering Council (NANC)

The PA attended the two meetings of the North American Numbering Council (NANC) on July 16 and October 15, and reported on the status of thousands-block pooling administration and events affecting the performance of the PA. In addition, the PA provided monthly reports to the NANC members at the request of the NOWG, and provided a mid-year status report on July 16.

#### 8.1.1 Future of Numbering (FoN) Working Group

The PA attended all meetings of the NANC Future of Numbering (FoN) Working Group in 2009. The NANC describes this committee as follows:

The NANC formed the Future of Numbering (FoN) in December, 2004. The mission of this working group is to explore changes to the environment, including new and future technologies and the impact of market place and/or regulatory changes and innovations on telephone numbering. The group identifies common criteria and gathers

data to identify trends and their impact upon numbering resources. If necessary, it will analyze those trends and requirements to determine the feasibility and benefit of each, and report its findings to the NANC.

### 8.2 Industry Forums

In 2009, we participated in over 130 industry meetings either in-person or by conference call. Our participation at industry forums includes:

- Working on issues that affect pooling and p-ANI administration;
- Answering questions and responding to action items relating to the thousands-block pooling process and p-ANI administration process;
- Developing and submitting new issues based on input we receive from the industry, regulators, and internal sources; and
- Actively participating in discussions leading to issue resolution.

The PA participated in the following industry forums in 2009:

**Industry Numbering Committee (INC)** – the PA submitted 20 new issues and 34 new contributions of the 47 issues and 76 contributions that the INC considered in 2009. This represents 43% of the issues and 44% of the contributions considered by INC in 2009. Of the *issues* submitted by the PA in 2009, 13 were pooling-related (see Table 8-1) and seven were related to p-ANI. (See Table 8-2). Of the *contributions* submitted by the PA in 2009, 26 were pooling-related (see Table 8-3) and eight were related to p-ANI (see Table 8-4). In April, Tara Farquhar was elected CIC co-chair. In

addition, she continues to serve the second year as VoIP co-chair.

**Network Routing Resources Information Committee (NRRIC)** – the PA participated in the NRRIC meetings. We continued to work with NRRIC on several issues, including reviewing the pooling section of Issue 0264-*Update the NIIF Mergers and Acquisitions Document* to ensure the accuracy of the pooling-related information. We also assisted with general editing in the other sections of the document. For Issue 0305-*Develop Mergers and/or Acquisitions Checklists*, the PA assisted with the creation of the checklists and provided information relating to the steps required for pooling. The PA also participated in discussions regarding NIIF Correspondence #090112-001 from the INC involving the removal of the term *LERG Assignee*.

**Common Interest Group on Rating and Routing (CIGRR)** – the PA participated in four face-to-face CIGRR meetings and 34 conference calls. We continued to review the *BCR-no-NXD* and *3E validation* reports<sup>5</sup> prior to the reports being sent to the Administrative Operating Company Numbers (AOCNs).

**Local Number Portability Working Group (LNPA WG)** – the PA participated in 22 LNPA WG meeting conference calls as a subject matter resource.

**Emergency Services Interconnection Forum (ESIF)** – the PA participated in both face-to-face

and conference call ESIF meetings and subgroup meetings in 2009 and submitted one new incoming correspondence for discussion. (See Table 8-5)

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<sup>5</sup> The *BCR- no-NXD* and *3E validation* reports are for blocks where there is a BCD record built but the SP has not built the NXD-X record. The *BCR-no-NXD* report is for records less than 45 days old and the *3E validations* report is for records over 45 days old. The PA's voluntary reviews of these reports helps to ensure data accuracy and saves work for the AOCNs.

**Table 8-1  
INC Issues Submitted by the PA in 2009 that are related to Pooling**

INC Meeting Number	Issue Number	Supporting Contribution Number	Issue/Contribution Title
INC 104	625	LNPA-574	Update the transfer sections of the Thousands Block Pooling Administration Guidelines (TBPAG) to include initial resource documentation
INC 104	626	LNPA-575	Check porting on all code returns
INC 105	632	LNPA-577	Updates to the dedicated code section of the TBPAG and Central Office Code Administration Guidelines (COCAG)
INC 105	633	LNPA-578	Numbering Resource Utilization Forecast (NRUF) reporting process from the TBPAG
INC 105	634	LNPA-579	Clarify transfer section regarding mutually agreed to transfers
INC 106	644	LNPA-588 and LNPA-589	Remove exception for an additional Location Routing Number (LRN) when a switch serves multiple Number Portability Administration Center (NPAC) regions
INC 106	645	LNPA-590	Clarify the PA responsibilities for pool replenishment
INC 107	648	LNPA-593	Updates to the Service Provider Forecast and Utilization Reporting Requirements (Section 6.2 of the TBPAG)
INC 107	650	LNPA-600	Add addition information to the TBPAG in regard to Operating Company Numbers (OCNs)
INC 108	654	LNPA-594	Remove the Requirement to List the Tandem COMMON LANGUAGE® Location Identification (CLLI) in Remarks Field
INC 108	655	LNPA-595	Add clarification to the thousands-block transfer process in the TBPAG
INC 108	656	LNPA-596	Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)
INC 108	663	LNPA-598	Check porting on block donations

**Table 8-2  
INC Issues Submitted by the PA in 2009 that are related to p-ANI**

INC Meeting Number	Issue Number	Supporting Contribution Number	Issue/Contribution Title
INC 104	627	CONXX-448	Update Section 5.7 of the p-ANI Guidelines to include steps for notification of a new NXX as outlined in correspondence from ESIF (ESIF-2008-034)
INC 105	635	CONXX-449	Clarify which NENA ID should be used by p-ANI applicants
INC 105	636	CONXX-450	Clarify that each NPA will be a separate pool even in overlay situations
INC 105	637	CONXX-451	Update the definition of p-ANI In Use Deadline

INC Meeting Number	Issue Number	Supporting Contribution Number	Issue/Contribution Title
INC 106	643	CONXX-453	Add 24X7 Emergency Company Contact Number to the p-ANI Part 1 form
INC 108	658	CONXX-457	Add a mass modification process to the p-ANI Administration Guidelines
INC 108	659	CONXX-458	Updates to the p-ANI transfer process

**Table 8-3  
INC Contributions Submitted by the PA in 2009 related to Pooling**

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 104	LNPA-574	Update transfer sections of TBPAG to include initial resource documentation	Issue 625: Update transfer sections of TBPAG to include initial resource documentation
INC 104	LNPA-575	Check porting on all code returns	Issue 626: Check porting on all code returns
INC 104	LNPA-576	Revised Issue 407 Resolution	Issue 407: Treatment of Dedicated Codes for single customers in a pooling environment
INC 105	LNPA-577	Updates to the Dedicated Code section of the TBPAG and COCAG	Issue 632: Updates to the Dedicated Code section of the TBPAG and COCAG
INC 105	LNPA-578	NRUF reporting process from the TBPAG	Issue 633: NRUF reporting process from the TBPAG
INC 105	LNPA-579	Clarify transfer section regarding mutually agreed to transfers	Issue 634: Clarify transfer section regarding mutually agreed to transfers
INC 106	LNPA-580	Updates to the TBPAG related to NRUF reporting processes	Issue 633: NRUF reporting process from the TBPAG

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 106	LNPA-581	Update the TBPAG to remove the term <i>LERG Assignee</i>	Issue 604: Code Holder vs. LERG Assignee
INC 106	LNPA-582	Indicate that an SP shall donate blocks to the pool that are less than 10% contaminated prior to returning a code	Issue 626: Check porting on all code returns
INC 106	LNPA-583	Updates to the pooled NXX Sections of the COCAG Appendix C to check porting on all pooled NXXs	Issue 626: Check porting on all code returns
INC 106	LNPA-584	Update Part 5 and Part 4 PA to remove term <i>LERG Assignee</i>	Issue 604: Code Holder vs. LERG Assignee
INC 106	LNPA-585	Updates to the COCAG and COCAG Appendix C to remove the term <i>LERG Assignee</i>	Issue 604: Code Holder vs. LERG Assignee
INC 106	LNPA-586	Updates to the LRN Assignment Practices	Issue 604: Code Holder vs. LERG Assignee
INC 106	LNPA-588	Remove the exception in the TBPAG for an additional LRN when a switch serves multiple NPAC regions	Issue 644: Remove the exception for an additional LRN when a switch serves multiple NPAC regions
INC 106	LNPA-589	Remove the exception in the LRN guidelines for an additional LRN for multiple NPAC regions in the LRN Assignment Practices	Issue 644: Remove the exception for an additional LRN when a switch serves multiple NPAC regions
INC 106	LNPA-590	Clarify the PA responsibilities for pool replenishment	Issue 645: Clarify the PA responsibilities for pool replenishment
INC 107	LNPA-591	Enhance the TBPAG to address updating red (pending PSTN confirmation) blocks	Issue 622: Enhance TBPAG to address "red" blocks (Verification of Activation in PSTN is Pending)



INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 107	LNPA-599	Updates to the Service Provider Forecast and Utilization Reporting Requirements (Section 6.2 of the TBPAG)	Issue: 648: Updates to the Service Provider Forecast and Utilization Reporting Requirements (Section 6.2 of the TBPAG)
INC 107	LNPA-600	Add additional information to the TBPAG in regard to OCNs	Issue 650: Add additional information to the TBPAG in regard to OCNs
INC 108	LNPA-594	Remove the Requirement to List the Tandem CLLI in Remarks Field	Issue 654: Remove the Requirement to List the Tandem CLLI in Remarks Field
INC 108	LNPA-595	Add clarification to the Thousands-block transfer process in the TBPAG	Issue 655: Add clarification to the Thousands-block transfer process in the TBPAG
INC 108	LNPA-596	Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)	Issue 656: Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)
INC 108	LNPA-598	Check porting on block donations	Issue 663: Check porting on block donations
INC 109	LNPA-601	Add clarification to the Thousands-block transfer process in the TBPAG	Issue 655: Add clarification to the Thousands-block transfer process in the TBPAG
INC 109	LNPA-603	Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)	Issue 656: Update TBPAG Expedite Process for Thousands-blocks (Section 8.6)
INC 109	LNPA-602	Update TBPAG replacing <i>LERG Assignee</i> with <i>Code Holder</i>	Issue 604: Code Holder vs. LERG Assignee

**Table 8-4**  
**INC Contributions submitted by the PA in 2009 related to p-ANI**

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 104	CONXX-448	Update Section 5.7 of the p-ANI Guidelines to include steps for notification of a new NXX as outlined in	Issue 627: Update Section 5.7 of the p-ANI Guidelines to include steps for notification of a new NXX as outlined in correspondence from ESIF (ESIF-2008-034)

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
		correspondence from ESIF (ESIF-2008-034)	
INC 104	NPA-240	Add RNA responsibilities during NPA relief to the p-ANI Guidelines	Issue 579: NPA Relief and p-ANI Resources
INC 105	CONXX-449	Clarify which NENA ID should be used by p-ANI applicants	Issue 635: Clarify which NENA ID should be used by p-ANI applicants
INC 105	CONXX-450	Clarify that every NPA will be a separate pool even in overlay situations	Issue 636: Clarify that every NPA will be a separate pool even in overlay situations
INC 105	CONXX-451	Update the definition of p-ANI In Use Deadline	Issue 637: Update the definition of p-ANI In Use Deadline
INC 106	CONXX-453	Add 24X7 Emergency Company Contact Number to the p-ANI Part 1 form	Issue 643: Add 24X7 Emergency Company Contact Number to the p-ANI Part 1 form
INC 108	CONXX-457	Add a mass modification process to the p-ANI Administration Guidelines	Issue 658: Add a mass modification process to the p-ANI Administration Guidelines
INC 108	CONXX-458	Updates to the p-ANI transfer process	Issue 659: Updates to the p-ANI transfer process

**Table 8-5  
ESIF Incoming Correspondence Submitted by the IRNA**

Date	Issue
2/12/09	RNA Reporting Requirements

### 8.3 PA Interaction with the Numbering Oversight Working Group (NOWG)

This section describes the PA’s interactions with the NOWG during 2009.

#### 8.3.1 Monthly Meetings

The Numbering Oversight Working Group (NOWG) is a working group of the NANC. The NOWG’s responsibilities with the PA include:

- Reviewing PA Change Orders and providing a recommendation to the FCC for the disposition of the proposed change order;
- Completing the annual performance review of the PA and providing it to the FCC;
- Conducting a monthly meeting with the PA to review the previous month’s performance.

The Regional Director, External Relations acts as the liaison between the PA and the NOWG, responding to pooling-related questions as they arise, and providing input to the NOWG on any

issues or questions as necessary during the year. The entire PA management team meets with the NOWG on the monthly conference calls and in the annual performance review process, including the operational review.

Each month in 2009, the NOWG and PA met via conference call to discuss the PA's performance during the previous month. The PA updates the agenda prior to each monthly meeting and the information is reviewed with the NOWG members in attendance. The agenda includes:

- Rate centers with less than 6 months inventory based on forecast
- Number of rate centers with no blocks available with blocks forecasted within 6 months
- Number of codes opened for pool replenishment
- Rate centers with blocks with a pending status
- Applications – number of applications processed monthly (running 12-month total)
- Number of Part 1s passed thru from PAS to NAS (running 12-month total)
- Percent of applications not processed within seven calendar days
- Reasons that applications were not processed within seven calendar days
- Percent of calls returned within one business day
- Number of blocks on the reclamation list (including the new blocks and the total number of blocks each month)
- Formal complaints and corrective action plans to resolve complaints, if any
- FCC and/or NANC News
- A read-out of all INC items that were put into initial or final closure the previous month, as well as new issues)
- Interim p-ANI activity
- Status of change orders
- Pooling related activities
- Regulatory update

- Customer focus
- Tracking log
- Next meeting
- Other items of import that do not fall into any of the above categories

In addition to reporting on the agenda items above, the PA provided 51 of the following additional reports to the NOWG for the monthly meetings in 2009:

- Blocks Report Information Summary Report - shows total number of rate centers with less than six months inventory based on forecast, total number of rate centers with no blocks available with blocks forecasted within six months, and total number of rate centers with pending blocks.
- Summary Data Report - shows rate centers with less than six-months inventory based on forecast, rate centers with less than six months inventory based on forecast having no available blocks, codes opened for pool replenishment, rate centers with blocks in a pending status, total number of applications (Part 3s) processed, the total number of Part 1s passed to NANPA, and the total number of applications, if any, not processed in seven calendar days.
- PA NOWG Issue List Report - shows opened, closed, and pending issues that are addressed with the NOWG.
- Change Order #1 Tracking Table (January through May and every six months, as requested) Report - shows the total number of times the following options are chosen when a PAS user is prompted with the pool replenishment option. The service provider will accept: blocks from the pool only, a combination of blocks from the pool and a new code, or blocks from a new code only. The report also shows how often the service provider escaped the screen without doing anything.
- PA Monthly NANC report – pooling activity from the prior month. We began providing

this report to the NOWG with the June 11 meeting materials.

The PA met with the NOWG on January 22, February 19, March 12, April 9, May 18, June 11, July 21, August 18, September 18, October 22, November 19, and December 17, 2009.

### 8.3.2 PA Performance Evaluation and Operational Review

Also in 2009, the NOWG completed the annual review of the 2008 PA performance and rated the PA performance as “More Than Met” by using the following inputs:

- 2008 Performance Feedback Survey
- Written comments and reports
- Annual Operational Review

- NOWG observations and monthly interactions with the PA

As a result of the 2008 PA annual operational review, which was held April 15-16 in our Concord, CA office, the NOWG made five suggestions for continuous improvement of pooling administration that the PA took under consideration. (See table 8-6) The PA reviewed all survey comments and responded to those that suggested a possible improvement or raised a concern. We contacted each person who made those comments and resolved any issues they may have had when they submitted them. We consolidated customer-suggested enhancements from these comments into Change Order #10. The PA worked, and continues to work cooperatively with the NOWG to implement any suggested improvements while also meeting our contractual requirements.

**Table 8-6  
NOWG Suggestions for PA improvements**

<b>NOWG Suggestion</b>	<b>PA Improvement</b>
Continue to proactively manage rate center inventories to ensure resources are available when needed.	The PA continually reviews rate center inventories. Through Change Order #1 in 2008, we implemented a process that gives an SP a pop-up menu of options if the pool needs to be replenished when the SP comes in to request resources.
Continue customer focus.	The PA always makes customer focus a priority. The PA keeps a log of significant customer focus items that are shared with the NOWG monthly. The log does not record the day-to-day customer interactions that assist our customers and are therefore also critical to our customer satisfaction.
Continue to consider process improvement suggestions provided by service providers and/or regulators in the survey comments.	The PA continued its practice of reviewing all suggestions for improvement, whether in survey comments or through customer contacts. We examined the feasibility of each suggested process improvement and PAS suggestion and responded with the result to the person who made the suggestion. A user-proposed

NOWG Suggestion	PA Improvement
	enhancement change order was submitted to the FCC (CO #10) on 9/3/09.
In addition to the cumulative method of reporting block reclamation, the NOWG recommends that the PA provide an incremental block reclamation report.	The PA now breaks out the reclamation report to show how many blocks are new that month as well as the total number of blocks that appear on the report each month.
The NOWG recommends that the PA prepare a monthly NANC report providing the NANC members with the current status of pooling activity.	In response to the request by the NOWG, the PA prepares an ad hoc monthly report of the current status of pooling activities to send to the NANC members. The PA also provides a copy of this report to the NOWG on a monthly basis.

The NOWG provides recommendations to the FCC on PA change orders. The NOWG recommended approval for all PA change orders that were submitted in 2009.

### 8.3.3 Trouble Ticket Taskforce

In December, 2008, the PA provided the NOWG with information concerning trouble tickets in response to an inquiry about how we processed them with the new PAS. During the 2008 operational review the NOWG inquired further about the PA trouble ticket process and we reviewed issues that service providers had expressed concerns about, but that were not contract requirements. We provided additional information on April 14, 2009 regarding the numbering and processing of tickets.

In order to fully examine the trouble ticketing process, a PA/NOWG taskforce was created to discuss how the PA handles calls when a customer is experiencing an issue with the website or PAS. We held the first and only meeting of the trouble ticket process taskforce on June 19, 2009. Seven members of the PA team and two members of the NOWG participated. After discussions, we provided

*Customer Contact Process Flow* charts to the task force members to document our regular process of (1) troubleshooting issues to determine whether the issues are PA-related or SP-related, and (2) maintaining an auditable trail of each contact and the results of such contact. As of December 31, the PA was continuing to work with the NOWG and the FCC to implement possible changes to the trouble ticket reporting requirements.

### 8.4 Formal Complaints

Pursuant to Section 2.9.4 of Clause C.1 of the *Contract for Pooling Administration Services for the Federal Communications Commission*, if a performance problem is identified by a telecommunications industry participant, the PA must notify the FCC of the problem within one business day. The PA must then investigate the problem and, within a period of not more than 10 business days from the date of the complaint, report to the FCC and to the telecommunications industry participant on the results of such investigation and any corrective action taken or recommended to be taken. This is the formal complaint process.

In 2009, the PA received no formal complaints.

### 8.5 Tips-of-the-Month

The PA, on its own initiative, created the *Tip-of-the-Month* (Tip) in July 2003. Feedback from recipients continues to be positive. Topics for the Tip are generated from issues raised and suggestions received from regulators and service providers, INC action items, the NOWG, and internal suggestions where processes need to be revised or clarified. The Tip is sent via email to the PAS distribution list on the first

business day of each month. The Tip provides users with helpful information regarding the PAS and thousands-block pooling process, as well as serving as a useful reference for them. Archive files for Tips from previous years can be found on our website at

<http://www.nationalpooling.com/tools/archives/tips-archive/index.htm>.

Table 8-7 describes all of the Tip topics that were covered by month in 2009.

**Table 8-7  
2009 Tips of the Month**

Month	Topic	Description
January	Reviewing Available Blocks in PAS	Informed users to take the “Block Available Date” into consideration when reviewing the <i>Available Blocks</i> report in PAS and selecting a block preference.
February	Disconnect a Previously Assigned Block or Donate a Retained Block	Informed users how to determine whether the donation or return/disconnect process should be used when returning blocks to the pool in PAS.
March	PAS Block Modification Request for an Effective Date Change that Needs NPAC Notification	This tip was first sent out as the August 2008 tip of the month and reissued in 2009 because users continued to ask about how to notify the NPAC of an effective date change. It informed users that if they want the NPAC to be notified of an effective date change they must select Part 1B in addition to Effective Date on the preliminary <i>Select Type of Block Change</i> PAS screen of the Block Modification request.
April	Months to Exhaust and Utilization Certification Worksheet – TN Level	Reminded users about how to complete the List of excluded Code(s) or Block(s) field in section D of the MONTHS-TO-EXHAUST and UTILIZATION CERTIFICATION

Month	Topic	Description
		WORKSHEET.
<b>May</b>	Supporting Documentation for Initial Thousands-Block and Pooled Code Applications	Reminded users to submit to the PA the evidence of certification and evidence documenting their readiness to provide service within 60 days of the thousands-block/pooled code effective date, the same day the initial thousands-block request and/or pooled code request is submitted in PAS.
<b>June</b>	To Begin Pooling in an Excluded Rate Center	Reminded users that they can request that the PA change a rate center status from Excluded to Optional by emailing the Customer Support Desk at <a href="mailto:poolingsupport@Neustar.biz">poolingsupport@Neustar.biz</a> so they may begin pooling at any time.
<b>July</b>	Using the Pool Tracking Report When Requesting an LRN	Educated users about reviewing the Pool Tracking Report when they are ordering an LRN to assist in pool replenishment.
<b>August</b>	Block Reservations	Outlined what a block reservation is and how users would go about requesting a block reservation.
<b>September</b>	Disconnecting Company's Responsibility for a Block Disconnect	Reminded users of their responsibility to notify the PA if there are contaminated TNs in the block that they are returning to the pool.
<b>October</b>	Service Compatibility Block Preference	Recommended that users compare their available block preference to the Telcordia™ LERG® Routing Guide NPA-NXX "A" record for service compatibility in their respective networks when selecting a block preference.
<b>November</b>	FCC Red Light Rule	Provided information about the FCC Red Light Rule and how to contact the FCC if their organization appears on the FCC's delinquency list.
<b>December</b>	PAS Password Resets	Informed users how to obtain a new password in the event they forget or misplace their existing password.

### 8.6 Annual PA Performance Survey

As part of the ongoing focus on customer satisfaction, the PA strives to publish an annual survey through which service providers and regulators may assess the PA’s performance. The survey is not a requirement of our FCC contract and is not connected with the annual performance survey completed by the NOWG for the NANC. It functions as an issue identifier that assists us with process enhancement and improving customer service, and is a significant and worthwhile adjunct to our constant customer focus.

We opened the survey for responses on October 13, and closed it on October 30. Participants had a choice of returning the survey either online or via email, fax, or mail. Prospective survey participants were asked to rate PA performance on a scale of one to five, with one (1) being lowest and five (5) being highest. We developed the 21 questions to

measure our performance in user interface, timeliness, knowledge, website information, and overall customer service. There were 160 surveys returned, 29 of which were from state regulators.

There was a 33% increase in the total number of surveys returned from the 2008 survey. Survey scores were consistent with those from the 2008 survey, with an overall average score of 4.6 out of a possible 5.0 for the 21 questions.

We contacted respondents who made suggestions or comments and many of the issues had already been addressed in change orders and others simply involved education. The new customer-suggested enhancements from these comments are targeted for a future change order.

Table 8-8 lists the actual questions and average survey response scores for 2009.

**Table 8-8  
2009 Annual PA Performance Survey Results**

5	4	3	2	1	0	Average Score
Strongly Agree	Agree	Somewhat Agree	Disagree	Strongly Disagree	Not Applicable	
The Pooling Staff members are knowledgeable about the thousands-block application processes.						4.7
The pooling staff members are professional in interactions with me.						4.8
The pooling staff members provide sufficient information regarding pooling at industry meetings.						4.7
The pooling staff members are knowledgeable about pooling related issues, and when necessary, refer me to the relevant guidelines, websites, or other appropriate resources.						4.6
The email notifications from the Pooling Staff members are helpful and informative.						4.4
The pooling staff members respond to my data requests in a timely manner.						4.7



5	4	3	2	1	0	Average Score
Strongly Agree	Agree	Somewhat Agree	Disagree	Strongly Disagree	Not Applicable	
Overall, I am satisfied with the level of service provided by the Pooling Staff members.						4.7
The Help Desk personnel assist me with resolution of my PAS issues and process questions.						4.7
When necessary the Help Desk personnel refer me to the relevant guidelines, websites or other appropriate resources.						4.6
The Help Desk personnel assist me with managing my PAS account issues.						4.7
The email notifications from the Help Desk are helpful and informative.						4.5
Overall, I am satisfied with the level of service provided by the Help Desk personnel.						4.6
The Pooling Administration System (PAS) allows me to easily fill out and submit applications, donations, forecasts and Part 4s.						4.5
The reports available through PAS such as the Part 1A report, Part 3 report, Assignments Needing Part 4 report, Forecast report and Donation reports are useful to me.						4.5
I am satisfied with the new streamlined ability in the enhanced PAS to submit Part 1s, Part 1As, and Part 4s.						4.5
The automatic pool replenishment information provided in PAS at the time requests are being submitted is helpful in determining when to replenish the pool.						4.4
Overall, I am satisfied with the level of service provided by the Pooling Administration System (PAS).						4.6
I am able to locate information such as SIM material, User Guides, Frequently Asked Questions (FAQs), reports and other information on the pooling website.						4.3
I find the information provided by the publicly available reports such as the Block Report, Block Report by Region, NPA/Rate Center Report, and the Pool Tracking Report on the website useful.						4.5
I find the capabilities on the website such as the ability to download and print publicly available reports useful, e.g., the Block Report, NPA/Rate Center Report, and the Pool Tracking Report.						4.5
Overall, I am satisfied with the pooling website.						4.5

The 2009 survey responses demonstrate significant satisfaction with PA performance. Following are some of the comments that supported this:

“It is always a pleasure to work with a professional and very helpful group of individuals.”

“All interactions that I've had with the Pooling Administration have been GREAT!!!!”

“The Help Desk and Pooling administrators are knowledgeable and a pleasure to work with. Thank you for all your help and support over the years!”

“I am very pleased and I want to say Thank you to all the personnel I deal with in the PA. They are always extremely helpful, kind, courteous and patient. They always make sure my problem/issue is handled. They are a pleasure to work with.”

“Overall, the Pooling Administration Staff has been very supportive and helpful, when called upon for assistance.”

“I've been very happy and impressed with the service provided by the PA team. They're knowledgeable and always willing to provide guidance & assistance.”

“All of my interactions with the Pooling Administration have been very pleasant experiences. The people are very professional and very helpful.”

“Great Service, Great people always helpful and understanding. “

“Always helpful and so kind. Wonderful people you have working there .”

“The entire pooling administration team is always a pleasure to deal with. By far the easiest group of people to deal with. They are all super friendly and are always willing to help. Wouldn't have it any other way!!! Thanks!”

“Overall PA is doing an excellent job in quality of service and information provided.”

“Everyone is so helpful and nice. I sincerely appreciate all the help and patience everyone has.”

“We have always had very quick and helpful responses to our questions. We appreciate all the information and help we receive.”

“I feel the PA is doing an excellent job. PA personnel are always a pleasure to work with. Keep up the good work!”

“The Pooling Administrator’s are knowledgeable and a great team to work with. I love working in PAS and find it an excellent way to submit my request (I go back to the email submissions).”

“The Pooling Staff has always been easy to work with, and are very knowledgeable. They’re always willing to answer my questions and provide assistance whenever needed. I always get great service.”

“The Pooling Administration Staff and Management are extremely helpful and have always been able to give me accurate information. The PAS is beneficial in reviewing and processing industry requests for waiver of PA denial of code requests.”

“Keep up the Great work.”

“Thanks for all your hard work, folks!”

“Just keep on doing what is being done.”

“General comment: the PAS system training was very thorough”

“I have no complaints with PAS or their staff. They are more than helpful and were very tolerant of my incessant questions as I was trying to get up to speed with reporting my company's information.”

“Overall, I am satisfied with the pooling website.”

## 8.7 Help Desk

The Customer Support Representative (CSR or Help Desk) is the human interface between the PAS and our customers. The Help Desk responds to both internal and external questions and requests for technical support, and attempts to promptly confirm the cause of a problem.

The CSR:

- Works with carriers to troubleshoot problems over the phone and at the desktop, to assist in resolving technical problems;
- Answers a variety of inquiries from customers, including questions regarding use of forms and the PAS, and assists users with locating documentation; and
- Creates, deletes, and maintains user accounts and passwords.

In 2009, the Customer Support Desk handled approximately 3,400 calls from customers. We attribute the decrease in calls to our ongoing educational efforts, Tips-of-the-Month, and training sessions, as well as users' increased familiarity with the new PAS. Table 8-9 shows the numbers of calls to the Help Desk by year since 2005.

**Table 8-9  
Number of Help Desk Calls by Year from 2005 through 2009**

Year	Number of Help Desk Calls
2005	6,000
2006	5,200
2007	3,900
2008	4,897
2009	3,400

## 8.8 Trouble Tickets in 2009

### 8.8.1 Trouble Tickets Opened in 2009

In 2009, the PA opened 11 trouble tickets related to issues with PAS. In each instance we promptly developed workarounds while the issue was being fixed, so that no user was unable to perform a desired transaction. At no time was any user's information compromised.

**Table 8-10  
Trouble Tickets Opened in 2009**

<i>Ticket Number</i>	<i>Date Opened</i>
1360	01/02/2009
1420	01/28/2009
1440	03/12/2009
1460	05/05/2009
1461	05/05/2009
1462	06/17/2009
1463	06/19/2009
1464	07/08/2009
1465	08/14/2009
1466	11/05/2009
1467	12/07/2009

### 8.8.2 Trouble Tickets Closed in 2009

In 2009, the PA closed 13 trouble tickets related to PAS issues. Four of the trouble tickets closed in 2009 were carried over from late 2008. Information in Table 8-11 below shows when each ticket was closed, and the amount of time each trouble ticket was open.

**Table 8-11  
Trouble Tickets Closed in 2009**

<i><b>Ticket Number</b></i>	<i><b>Date Opened</b></i>	<i><b>Date Closed</b></i>	<i><b>Days/Hours Opened</b></i>
1301	11/03/2008	01/23/2009	81 Days, 3 Hours & 21 Minutes
1340	11/24/2008	02/27/2009	94 Days, 17 Hours & 49 Minutes
1341	12/04/2008	01/23/2009	50 Days, 7 Hours & 45 Minutes
1400	12/29/2008	01/04/2009	6 Days, 7 Hours & 0 Minutes
1360	01/02/2009	05/15/2009	133 Days, 8 Hours & 13 Minutes
1420	01/28/2009	05/15/2009	107 Days, 8 Hours & 35 Minutes
1440	03/12/2009	05/15/2009	64 Days, 8 Hours & 51 Minutes
1460	05/05/2009	07/24/2009	80 Days, 9 Hours & 58 Minutes
1461	05/05/2009	10/16/2009	164 Days, 6 Hours & 38 Minutes
1462	06/17/2009	07/24/2009	37 Days, 12 Hours & 04 Minutes
1463	06/19/2009	06/23/2009	4 Days, 3 Hours & 42 Minutes
1464	07/08/2009	07/24/2009	16 Days, 10 Hours & 19 Minutes
1465	08/14/2009	10/16/2009	63 Days, 4 Hours & 56 Minutes

Table 8-12 below shows the total number of trouble tickets opened, by year, since 2005.

**Table 8-12**  
**Number of Trouble Tickets from 2005 through 2009**

<i>YEAR</i>	<i>NUMBER OF TROUBLE TICKETS</i>
2005	27
2006	18
2007	8
2008	28
2009	11

## Section 9 - Volume of Reports Produced in 2009 Aggregated by Regulatory Agency, NANC, NANPA and Service Providers

This section provides the total number of non-standard reports sent to the FCC and state regulatory agencies (See Section 9.1) and the total number of non-standard reports provided to NANC, NANPA, and service providers (See Section 9.2). In addition, Section 9.3 summarizes the number of ad hoc reports we produced in 2009. These totals do not include standard reports that were obtained directly from the Pooling Administration website and/or PAS by service providers and regulators or the 16 metrics reports that are only posted to the website. Including the total number of reports listed below and the website-only metrics reports, the PA produced 1,255 reports in 2009.

### 9.1 Total number of non-standard reports produced for FCC and state regulatory agencies

Regulatory agency	Total number of reports
FCC	88
State Regulators	1,008
<b>Total</b>	<b>1,096</b>

The total number of reports above includes:

- FCC: CDRL and other contract reporting requirements.
- State Regulators: pooling status, reclamation, educational sessions, and miscellaneous *ad hoc* reports.

### 9.2 Total number of non-standard reports produced for NANC, NANPA and service providers

Group	Total number of reports
NANC	10
NANPA	43
Service providers	90
<b>Total</b>	<b>143</b>



The total number of reports above includes:

- NANC: Meeting reports for July and October as well as the monthly pooling reports.
- NANPA: Reports for NANPA industry meetings and two NRUF-cycle reports.
- Service providers: Rate center change reports, implementation meeting reports, monthly meeting reports to the NOWG, and miscellaneous *ad hoc* reports.

### 9.3 Volume of Ad Hoc Reports Produced

Pursuant to CDRL 4.6.5 per Section 2.22.4.5 (as modified by Contract Modification #3), the PA reports each month how many ad hoc reports it has produced by category. The total number of *ad hoc* reports by group includes:

- FCC: reports provided to the FCC other than those specified in the contract.
- State Regulators: reports provided to state regulators that are not directly obtained from the Pooling Administration System (PAS) or specified in the contract, such as pooling status, and other miscellaneous reports.
- Service providers: reports requested by service providers that are neither specified in the contract, nor directly obtained from the Pooling Administration System (PAS).
- Other: reports not covered above, such as reports specially requested by the NANC or the NOWG other than those provided for regular meetings.

Table 9-1 below summarizes the total number of ad hoc reports produced by the PA in between January 1 and December 31, 2009:

**Table 9-1  
Total Number of 2009 Ad Hoc Reports**

<b>Group</b>	<b>Total number of <i>ad hoc</i> reports produced in 2009</b>
FCC	2
State Regulators	33
Service Providers	11
Other	8
<b>Total</b>	<b>54</b>

## Section 10 - Trends in Pooling Since 2005

When Neustar began administering number pooling trials in 1998, nearly every NPA was experiencing acceleration of exhaust dates and many required extraordinary jeopardy procedures<sup>6</sup> in order to maintain enough resources until relief was implemented.

In September 1999, there were 73 NPAs in jeopardy. There are currently 21 NPAs in a jeopardy status and only four of these, Illinois 217, Kentucky 270, Alabama 256, and Pennsylvania 570, have been declared in jeopardy since the rollout of national thousands-block number pooling began in 2002.

In April 2004, there were 56 NPA areas that were in an “active” NPA relief planning status according to the “NPA Relief Activity Status Report” on NANPA website. Currently, there are 51, signifying a reduction in the number of NPAs undergoing NPA relief since the rollout of national pooling was completed.

While these developments may not be solely attributable to thousands-block number pooling, the PA calculates that 45,173 NXXs have been saved by pooling, which is the equivalent of more than 56 NPAs. (See Section 10.1 below for further details)

Since Neustar began the national rollout of thousands block number pooling in March 2002, participation in pooling has dramatically increased. This increase can be attributed to the completion of the national rollout, the addition of wireless to pooling in November 2002, new service offerings, modifications to the rate area designations as a result of OMB changes to the MSA lists, service providers

voluntarily pooling in optional rate areas, implementation of additional delegated authority, and regulatory enforcement. (See 10.5 below for further details)

### 10.1 NXXs Saved by Pooling

Table 10-1 illustrates by NPA complex<sup>7</sup> the 45,173 NXXs that have been saved in 50 states and the District of Columbia and Puerto Rico with number pooling. NXXs were saved in all but one pooled NPA area, Alaska 907, and this is simply because there is limited participation in pooling in that NPA.

**Table 10-1**  
**NXXs Saved by Pooling**

<i>NPA</i>	<i>State</i>	<i>Total of NXXs Saved</i>
201/551	NJ	250
202	DC	19
203/475	CT	216
205	AL	159
206	WA	43
207	ME	397
208	ID	173
209	CA	294
210	TX	17
212/646/917	NY	26
213	CA	60
214/469/972	TX	256
215/267	PA	384
216	OH	37

<sup>6</sup> NANPA declares “jeopardy” in area codes for which the supply of NXXs could exhaust before relief can be provided

<sup>7</sup> An NPA complex is one pooling area that is covered by more than one NPA, most often an overlay situation.

217	IL	207
218	MN	159
219	IN	185
224/847	IL	484
225	LA	86
228	MS	44
229	GA	68
231	MI	289
234/330	OH	348
239	FL	75
240/301	MD	444
248/947	MI	306
251	AL	73
252	NC	152
253	WA	120
254	TX	64
256	AL	184
260	IN	188
262	WI	247
269	MI	346
270	KY	171
276	VA	96
281/713/832	TX	282
302	DE	221
303/720	CO	89
304/681	WV	407
305	FL	15
305/786	FL	58
307	WY	104
308	NE	30
309	IL	111
310/424	CA	324
312/872	IL	17
313	MI	84
314	MO	56
315	NY	252
316	KS	51
317	IN	196
318	LA	138
319	IA	75

320	MN	165
321	FL	41
321/407	FL	138
323	CA	194
325	TX	34
331/630	IL	270
334	AL	182
336	NC	175
337	LA	118
339/781	MA	395
347/718	NY	29
347/718/917	NY	164
351/978	MA	485
352	FL	192
360	WA	273
361	TX	136
385/801	UT	190
386	FL	121
401	RI	128
402	NE	118
404/678	GA	23
405	OK	183
406	MT	194
408	CA	141
409	TX	78
410/443	MD	656
412/878	PA	205
413	MA	309
414	WI	29
415	CA	173
417	MO	219
419/567	OH	371
423	TN	175
425	WA	121
430/903	TX	177
432	TX	36
434	VA	101
435	UT	113
440	OH	214
442/760	CA	526

458/541	OR	290
478	GA	62
479	AR	60
480	AZ	16
484/610	PA	642
501	AR	89
502	KY	92
503/971	OR	168
504	LA	26
505	NM	108
507	MN	172
508/774	MA	782
509	WA	250
510	CA	181
512	TX	144
513	OH	99
515	IA	107
516	NY	119
517	MI	289
518	NY	237
520	AZ	65
530	CA	440
540	VA	259
559	CA	251
561	FL	105
562	CA	114
563	IA	47
570	PA	417
571/703	VA	169
573	MO	272
574	IN	147
575	NM	98
580	OK	126
585	NY	231
586	MI	148
601/769	MS	193
602	AZ	11
603	NH	594
605	SD	50
606	KY	93

607	NY	101
608	WI	121
609	NJ	380
612	MN	18
614	OH	126
615	TN	187
616	MI	284
617/857	MA	229
618	IL	300
619	CA	126
620	KS	193
623	AZ	14
626	CA	150
631	NY	419
636	MO	180
641	IA	96
650	CA	183
651	MN	66
657/714	CA	229
660	MO	125
661	CA	226
662	MS	356
678/770	GA	267
682/817	TX	181
701	ND	40
702	NV	36
704/980	NC	307
706/762	GA	225
707	CA	471
708	IL	318
712	IA	80
715	WI	122
716	NY	238
717	PA	344
719	CO	109
724/878	PA	573
727	FL	64
731	TN	131
732/848	NJ	435
734	MI	330

740	OH	324	863	FL	125
747/818	CA	271	864	SC	248
754/954	FL	82	865	TN	139
757	VA	157	870	AR	118
763	MN	37	901	TN	49
765	IN	249	904	FL	136
772	FL	111	906	MI	65
773/872	IL	108	907	AK	0
775	NV	114	908	NJ	263
779/815	IL	450	909	CA	269
785	KS	189	910	NC	234
787/939	PR	74	912	GA	72
802	VT	262	913	KS	60
803	SC	210	914	NY	223
804	VA	192	915	TX	27
805	CA	382	916	CA	160
806	TX	53	918	OK	167
808	HI	31	919	NC	214
810	MI	260	920	WI	295
812	IN	184	925	CA	208
813	FL	107	928	AZ	81
814	PA	373	931	TN	201
816	MO	141	936	TX	59
828	NC	186	937	OH	309
830	TX	130	940	TX	70
831	CA	150	941	FL	113
843	SC	176	949	CA	117
845	NY	417	951	CA	284
850	FL	166	952	MN	31
856	NJ	309	956	TX	140
858	CA	110	970	CO	296
859	KY	101	979	TX	98
860	CT	272	985	LA	187
862/973	NJ	481	989	MI	344

## 10.2 Trends in Thousands-Block Number Pooling

This section contains summaries of thousands-block number pooling statistics since 2005.

### 10.2.1 Pooling Charts

The following charts contain pooling statistics that illustrate the productivity trends of the PA between 2005 and 2009. Table 10-2 shows NXXs opened for LRNs, dedicated customers, and pool replenishment, as well as blocks assigned by the PA during that year, total assigned blocks in the PAS at year end and total applications processed at year end (Part 3s). Figures 5 through 10 are graphic representations of each individual category.

**Table 10-2  
Pooling Activity from 2005 through 2009 At-A-Glance**

	<i>2005 Statistics</i>	<i>2006 Statistics</i>	<i>2007 Statistics</i>	<i>2008 Statistics</i>	<i>2009 Statistics</i>
NXXs Opened for LRNs	945	968	689	879	553
NXXs Opened for Dedicated Customers	135	128	178	137	129
NXXs Opened for Pool Replenishment	1,305	2,006	1,802	1,555	1,273
Blocks Assigned by PA During Year	55,990	62,606	46,796	47,898	34,364
Total Assigned Blocks in PAS at Year End	109,420	162,234	190,721	229,336	253,087
Applications Processed	102,304	127,965	115,982	108,835	87,781

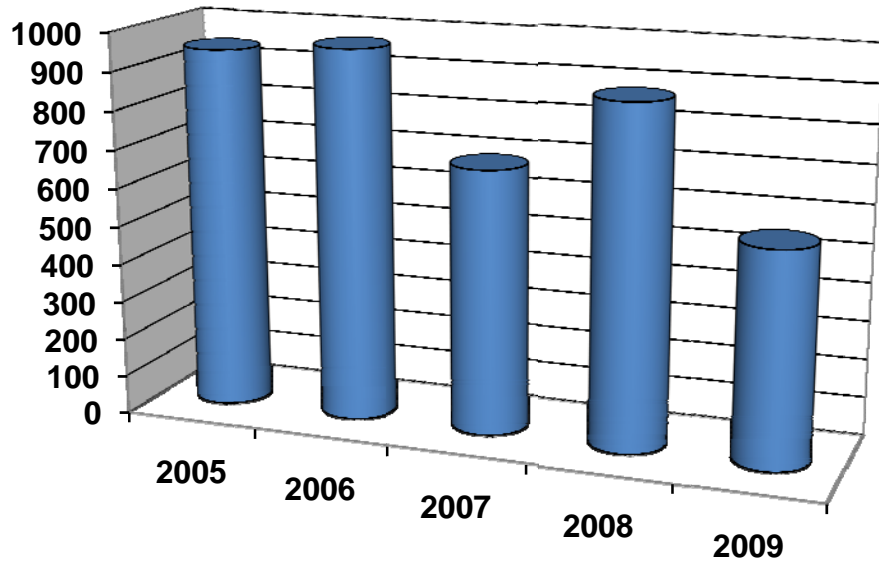


Figure 5 – CO Codes Opened for LRNs from 2005 through 2009

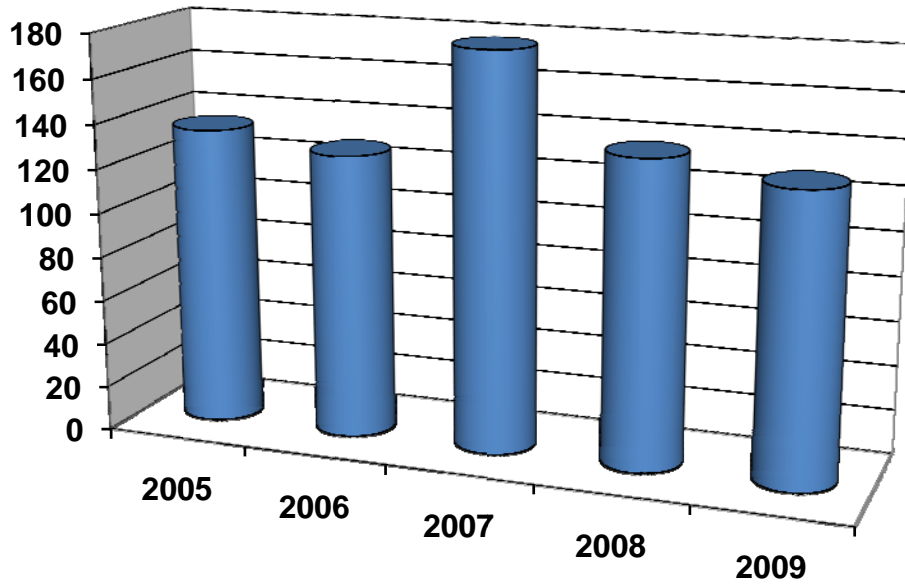


Figure 6 – CO Codes Opened for Dedicated Customers from 2005 through 2009

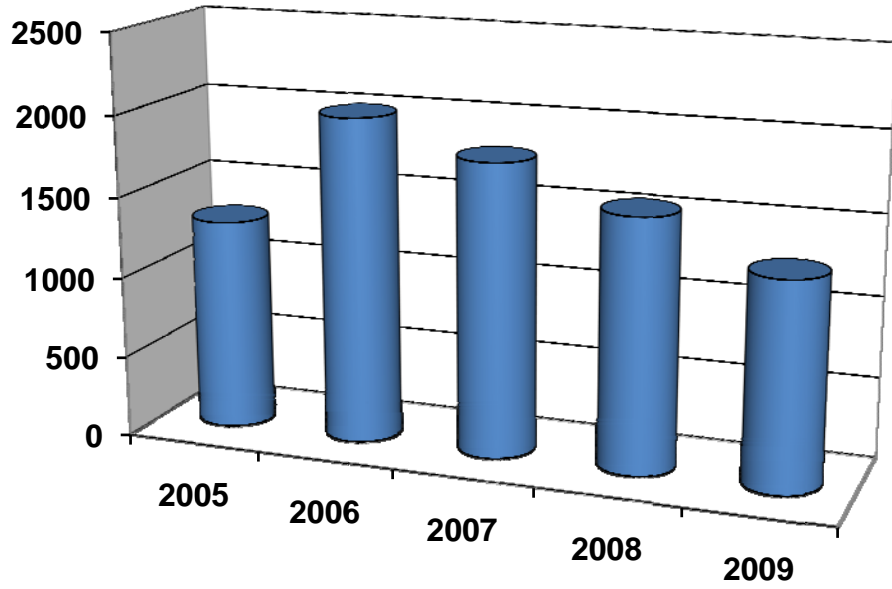


Figure 7 – CO Codes Opened for Pool Replenishment from 2005 through 2009

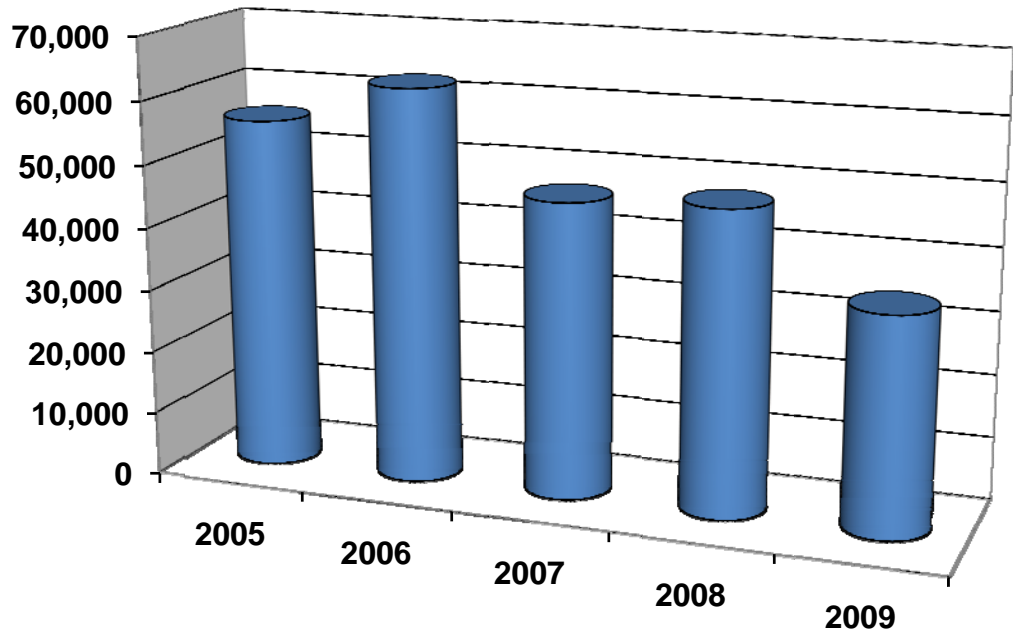


Figure 8 – Blocks Assigned During Years from 2005 through 2009



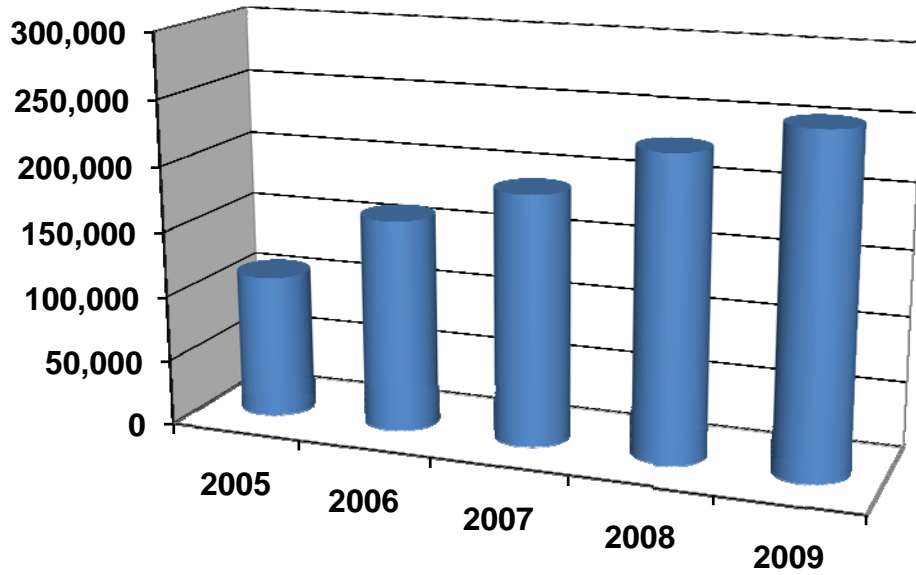


Figure 9 – Assigned Blocks at End of Years 2005 through 2009

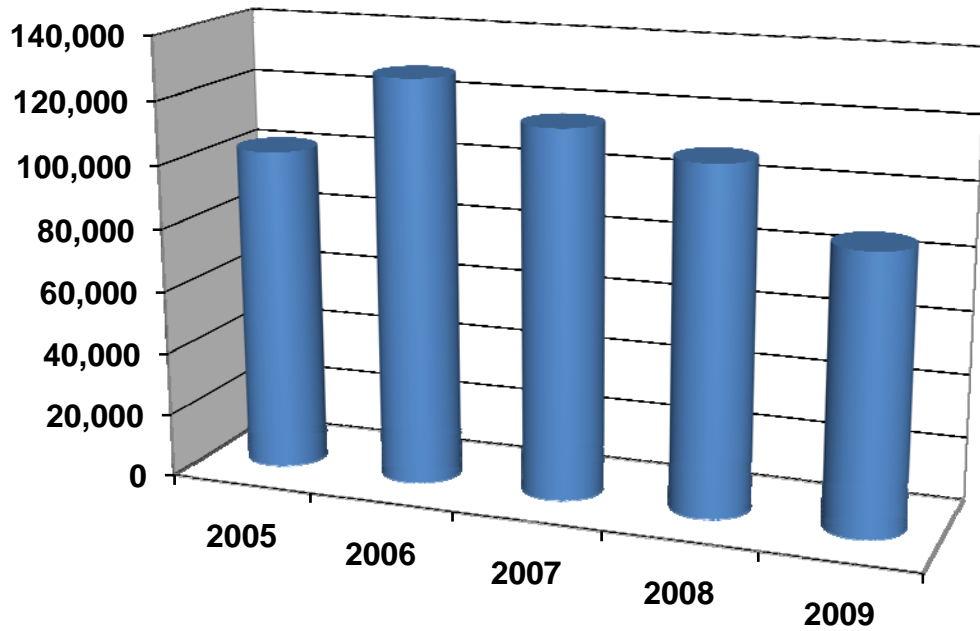


Figure 10 – Applications (Part 3s) Processed From Years 2005 through 2009

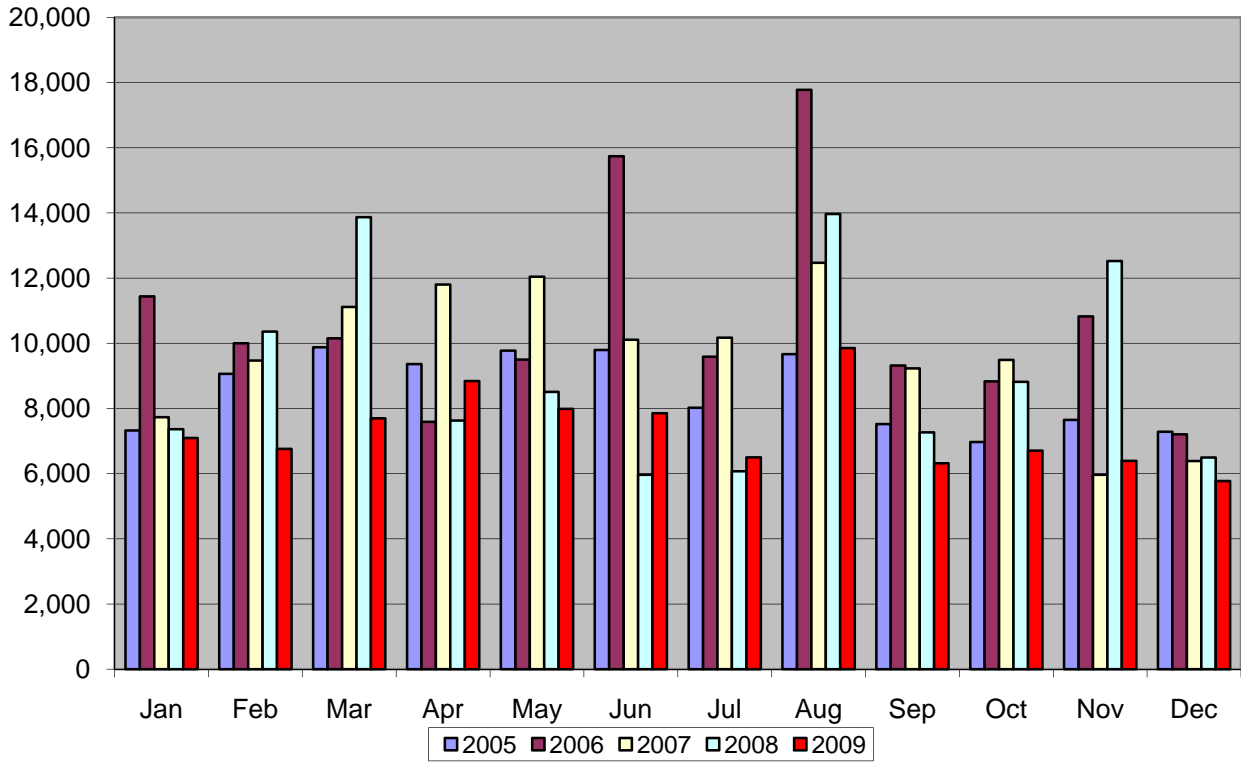
### 10.2.2 Total Applications Processed (Part 3s) from 2005 through 2009

The total number of applications (Part 3s) processed is the best measure of the actual processing work performed by the pooling administrators. Although a large majority of applications for numbering resources are processed and approved immediately, some are suspended for future action, and some are withdrawn or denied entirely.

The following charts contain the total numbers of Part 3s processed from 2005 through 2009.

**Table 10-3**  
**Total Applications Processed (Part 3s) Since 2005**

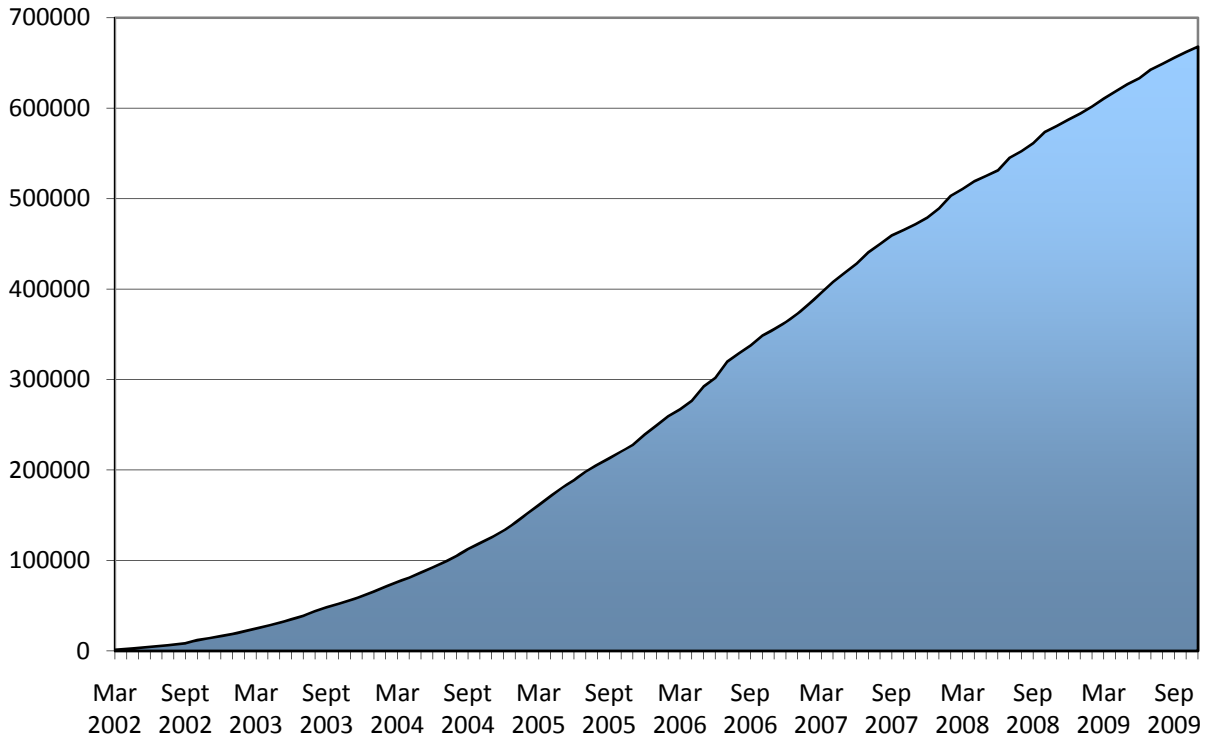
	2005	2006	2007	2008	2009
<b>Jan</b>	7,324	11,439	7,732	7,365	7,095
<b>Feb</b>	9,062	10,001	9,472	10,356	6,761
<b>Mar</b>	9,878	10,150	11,112	13,868	7,700
<b>Apr</b>	9,363	7,588	11,801	7,631	8,841
<b>May</b>	9,776	9,501	12,044	8,506	7,986
<b>Jun</b>	9,792	15,737	10,110	5,965	7,856
<b>Jul</b>	8,022	9,590	10,171	6,071	6,499
<b>Aug</b>	9,666	17,778	12,468	13,968	9,853
<b>Sep</b>	7,520	9,319	9,228	7,267	6,319
<b>Oct</b>	6,970	8,831	9,488	8,819	6,708
<b>Nov</b>	7,648	10,826	5,967	12,524	6,390
<b>Dec</b>	7,283	7,205	6,389	6,495	5,773
<b>TOTAL</b>	<b>102,304</b>	<b>127,965</b>	<b>115,982</b>	<b>108,835</b>	<b>87,781</b>



**Figure 11 - Total Applications Processed by Month from 2005 through 2009**

**10.2.3 Cumulative Thousands Blocks Assigned Since 2002**

The following graph illustrates the cumulative number of total blocks assigned since 2002.



**Figure 12 - Cumulative Pooling Administration Applications (Part 3s) from March 2002 through December 2009**

**10.3 Trends in Thousands-Block Pooling By State and NPA from 2005 through 2009**

During the past five years, the PA has processed a significant number of applications and assigned a considerable number of blocks. Below are several charts identifying the states and NPAs with the highest activity levels for applications, assignments, and reclamation.

**Table 10-4**  
**Top 10 NPAs for Total Number of Applications from 2005 through 2009 (Part 3s)**

<b>State</b>	<b>NPA</b>	<b>Total Applications</b>
NY	347	8,788
NY	646	5,118
CA	323	4,342
CA	714	4,319
IL	773	4,114
NC	704	4,104
PA	724	4,016
GA	678	4,003
MD	443	3,986
TX	832	3,767

**Table 10-5**  
**Top 10 States for Number of Applications from 2005 through 2009 (Part 3s)**

<b>State</b>	<b>Total Applications</b>
CA	65,327
TX	40,795
NY	39,573
FL	31,285
PA	25,073
IL	23,624
MI	21,585
OH	19,327
NJ	17,367
MA	15,128

**Table 10-6**  
**Top 10 NPAs for Total Number of Block Assigned from 2005 through 2009**

<i>NPA</i>	<i>State</i>	<i>Total Blocks Assigned</i>
347	NY	4,185
678	GA	2,340
832	TX	2,247
773	IL	2,146
646	NY	2,134
323	CA	2,108
508	MA	2,003
281	TX	1,952
704	NC	1,933
760	CA	1,913

**Table 10-7**  
**Top 10 States for Number of Block Assigned from 2005 through 2009**

<i>State</i>	<i>Total Blocks Assigned</i>
CA	31,875
TX	20,576
NY	18,568
FL	15,245
PA	12,528
IL	11,005
MI	9,699
OH	9,241
NJ	8,459
MA	8,178

**10.4 – Reclamation 2005 through 2009**

The PA has been authorized to reclaim 376 blocks since 2005. Table 10-8 shows the total number of blocks reclaimed by state since 2005, ranked from highest to lowest.

**Table 10-8.  
Reclamation by Total Number of Blocks Reclaimed from 2005 through 2009**

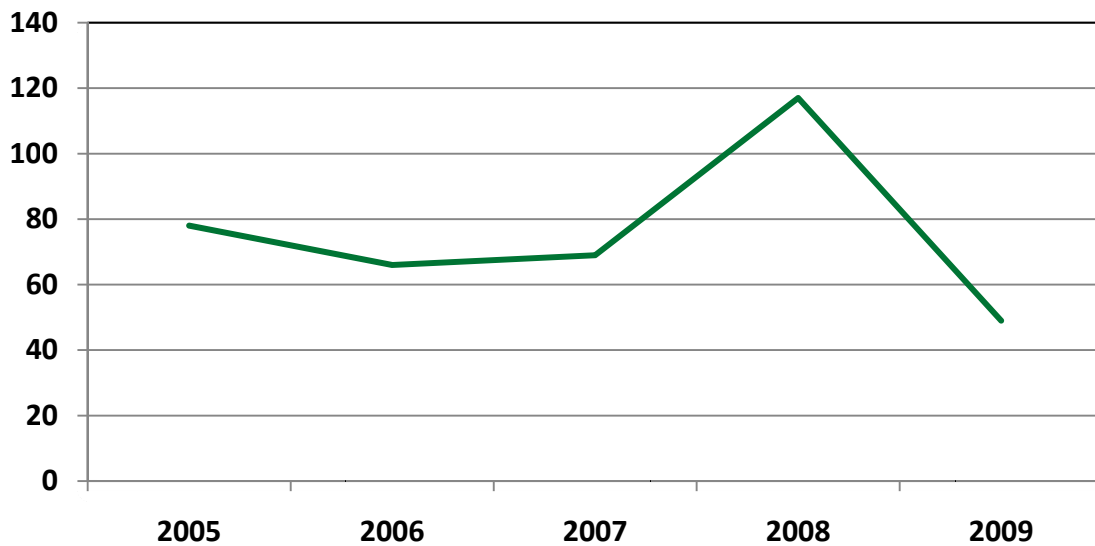
<b>STATE</b>	<b>TOTAL NUMBER OF BLOCKS RECLAIMED</b>
INDIANA	56
TEXAS	38
MICHIGAN	30
VIRGINIA	27
CALIFORNIA	23
NEW HAMPSHIRE	22
MISSISSIPPI	17
WEST VIRGINIA	17
VERMONT	15
OREGON	14
NEW JERSEY	13
WASHINGTON	12
COLORADO	11
PENNSYLVANIA	11
IDAHO	9
ILLINOIS	8
OHIO	8
ALABAMA	6
NEW YORK	6
ARKANSAS	5
DELAWARE	5
FLORIDA	4
GEORGIA	4
KANSAS	4
WISCONSIN	4
UTAH	2
ARIZONA	1
CONNECTICUT	1
IOWA	1
OKLAHOMA	1
PUERTO RICO	1
<b>TOTAL</b>	<b>376</b>

Table 10-9 shows the progress the PA has made in reducing the cumulative number of blocks on the reclamation lists each month, as well as how many blocks have been reclaimed by year since 2005.

**Table 10-9  
Summary of Reclamation from 2005 through 2009**

YEAR	NUMBER OF CUMULATIVE BLOCKS ON THE LIST	NUMBER OF BLOCKS RECLAIMED
2005	13,854	78
2006	18,912	66
2007	32,343	69
2008	22,013	117
2009	9,839 <sup>8</sup>	49

**Blocks Reclaimed from 2005 through 2009**



**Figure 13 - Blocks Reclaimed by Year from 2005 through 2009**

<sup>8</sup> The precipitous drop in the number of blocks on the reclamation list in the past year is directly attributable to the Very Old Overdue Part 4 project pro-actively undertaken by the PA. (See *Section 2.8.3*)



## 10.5. Summary of Pooled Areas since 2005

### 10.5.1 Aggregated Pooled Areas – 2005 through 2009

The following chart represents a summary of the aggregated total of the number of pooling areas, those designated as mandatory or optional, as well as the number of service providers participating in the pooled areas since 2005. In the past five years of pooling, the total number of rate areas in pooling has increased approximately 11%, from 13,168 at the end of 2005 to 14,574 at the end of 2009. The number of service providers has increased approximately 38%, from 1,745 at the end of 2005 to 2,406 at the end of 2009. This influx of new service providers provides a consistent set of new PAS users that need to be educated and guided through the pooling processes every year.

**Table 10-10**  
**Summary of the Aggregated Total Number of Service Providers and Pooling Areas**  
**from 2005 through 2009**

<b>YEAR</b>	<b>TOTAL NUMBER OF DISTINCT POOLING SERVICE PROVIDERS</b>	<b>POOLED AREAS</b>
<b>2005</b>	1,745	13,168
<b>2006</b>	1,955	13,639
<b>2007</b>	2,200	14,015
<b>2008</b>	2,350	14,285
<b>2009</b>	2,406	14,574

10.5.2 Total Pooling versus Total Excluded Rate Areas – 2005 through 2009

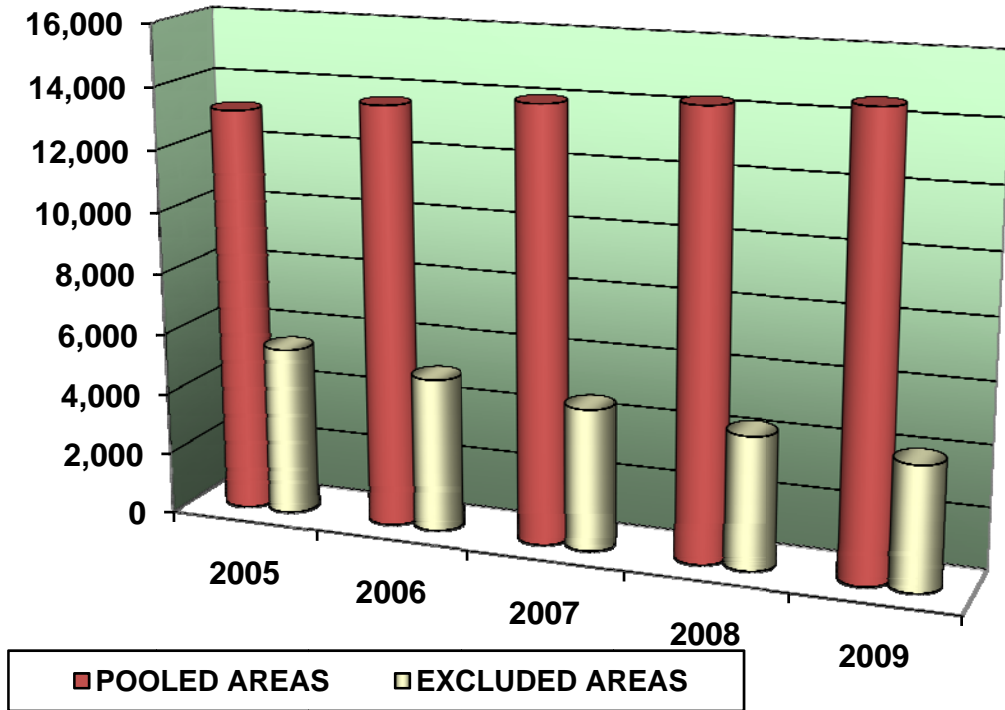


Figure 14 - Pooling Versus Excluded Rate Areas

10.5.3 Total Number of Distinct Pooling Service Providers – 2005 through 2009

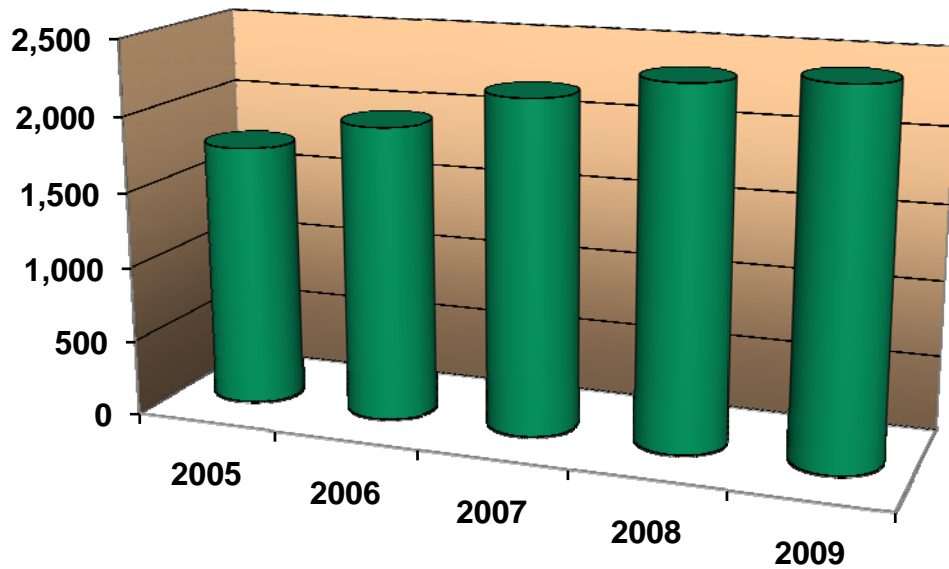


Figure 15 - Total Number of Distinct Service Providers by OCN