National Pooling and P-ANI Administration

2013

Annual Report

neustar

March 31, 2014

Mr. Gary Klaff
Contracting Officer
FCC Contracts and Purchasing Center
445 12th Street S.W.
Washington, D.C. 20554
RE: Contract Number CON07000005

Dear Mr. Klaff:

Attached please find the *Thousands-Block Pooling Administration 2013 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. FCC13C0007 (Contract). This report covers Pooling Administration (PA) and P-ANI Administration activities from January 1, 2013 through December 31, 2013, and is required by Attachment A 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 and P-ANI Administrator,
- 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.

During 2013, we continued our extraordinary level of contract compliance and customer service while processing a record number of 137,375 applications within 7 calendar days. This was the highest annual total of applications processed since national pooling began. We also exceeded the performance metric for both the Pooling and Routing Number Administration Systems (PAS and RNAS), maintained strict reporting compliance, completed several special projects, and had no formal complaints. We also worked closely with the FCC and the industry to implement a successful trial of interconnected VoIP service providers' direct access to numbering resources. In addition to our usual duties as PA and P-ANI Administrator, we began development for the considerable number of enhancements we proposed to make to PAS in 2014 as part of our response to the pooling-related contract solicitation. All of this combined with our consummate focus on customer support adds up to another extraordinary year.

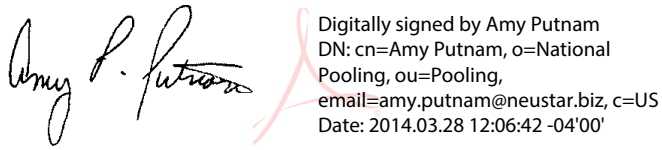
The PA met or exceeded all of its performance goals and objectives in 2013. The goals, most of which are expressed in the contract, include:

- System availability of 99.9% or better;
- 100% of received calls answered within one business day;
- 99% of pooling applications processed within seven calendar days;
- 99% of p-ANI applications processed within five business days;
- Unscheduled maintenance of the PAS and RNAS to be less than 9 hours in any 12 month period;
- Scheduled maintenance of the PAS and RNAS 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 per Section 5.0;
- Strong customer focus;
- No formal complaints.

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. We are proud of our accomplishments in 2013 and we will continue to work cooperatively and productively with you, service providers, industry groups, and regulatory staff throughout our contract as we have since 2001.

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.

Cc: Ann Stevens, Esq., FCC
Sanford Williams, Esq., FCC
Gary Remondino, COR, FCC
William Reidway, Neustar

neustar

Table of Contents

Table of Figures

Section 1
Description of Neustar Pooling and P-ANI Administration

"Overall, the PA's that I work with have been great, respond quickly and demonstrate a high level of professionalism – no complaints."
2013 PA Survey Comment

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. We 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 renewable annually for the remaining three. This second contract became effective on August 15, 2007, with the base period ending on August 14, 2009. The FCC issued the following contract modifications in accordance with FAR 52.217-9 to continue that contract:

- Contract Modification #8 on August 10, 2009, exercising Option Period I from August 15, 2009 through August 14, 2010.
- Contract Modification #13 on August 23, 2010, exercising Option Period II from August 15, 2010 through August 14, 2011.
- Contract Modification #18 on July 18, 2011, exercising Option III from August 15, 2011 through August 14, 2012.
- Contract Modification #22 on August 14, 2012, extending the contract for six months from August 15, 2012 through February 14, 2013.
- Contract Modification #24 on February 14, 2013, extending the contract for four months through June 14, 2013.
- Contract Modification #25 on June 13, 2013, extending the contract for one month from June 15, 2013 through July 14, 2013.

In June, 2013, Neustar successfully bid for its third national pooling contract which was awarded on July 12. The current contract is for a base period of one year beginning July 15, 2013 and ending on July 14, 2014, with a three possible one year extensions, ending in July, 2017.

1.2 Neutrality

Neustar Pooling Administration (PA) is an independent, neutral third party, as defined in Section H.3.3, *Neutrality Requirements*, of the pooling contract. 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 its directors, its officers, and pooling employees, must, on a quarterly basis, 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.

The PA also participates in the quarterly neutrality audits conducted by Ernst & Young, as more fully discussed in Section 1.5.

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 NANPA, the 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 centers designated for thousands-block number pooling to receive telephone numbers in blocks of 1,000. In addition, we maintain accurate rate center designations.

For further information on the PA requirements, see Attachment A of FCC Contract No. FCC13C0007.

neustar

1.4 Description of Routing Number Administration (RNA)

In addition to pooling administration, the PA was the Interim Routing Number Administrator (IRNA) from 2006 to March 18, 2012. We assumed the permanent Routing Number Administrator (RNA) function as of March 19, 2012.

By letter dated September 6, 2006, the FCC directed the PA to begin assigning Emergency Service Query Keys (ESQKs) under certain limited circumstances as the Interim Routing Number Administrator (IRNA). When the FCC awarded the new PA contract in August, 2007, it included the provision that the new national PA would act as the permanent Pseudo-Automatic Number Identification (p-ANI) Administrator (a/k/a Routing Number Administrator or RNA) once the FCC determined the permanent process.

On June 17, 2011, the FCC approved Neustar's Change Order Proposal #19 addressing implementation of the permanent RNA function. Neustar Pooling Administration assumed the responsibility as the permanent RNA on March 19, 2012. As the RNA, we are responsible for managing and assigning non-dialable p-ANIs, which are used to support the routing of wireless and VoIP 9-1-1 calls. The p-ANIs are assigned out of the 211 NXX and 511 NXX on a national basis, as well as in Puerto Rico and the Virgin Islands.

Upon approval of the Change Order in 2011, the RNA established a nine-month transition period, during which the new Routing Number Administration System (RNAS) and website www.nationalpani.com were developed, tested, and implemented. During the transition period, the RNAS inventory was populated with non-dialable p-ANI assignment data received from the p-ANI assignors and p-ANI users. At the end of transition, assignment of non-dialable p–ANIs in all states, the District of Columbia and Puerto Rico transitioned to Neustar as the permanent RNA with no other entity administering or self-assigning non-dialable p-ANIs. The Virgin Islands were added to the RNAS on September 24, 2012. The RNA functions are included in the current Pooling Administration Services contract, FCC13C0007.

In compliance with the current contract, the RNA:

- Provides processes for a standardized application of all administrative p-ANI guidelines;
- Maintains a system containing both hardware and software to facilitate the assignment, tracking, and data reporting requirements; and,
- Maintains and plans for adequate p-ANI inventory.

For further information on the RNA requirements, see Change Order 19 on our website, www.nationalpooling.com, under Documents.

1.5 Neutrality Audits

In April, 2011, the PA began participating in the quarterly neutrality audits conducted by Ernst & Young (E&Y). This audit ensures that the PA is not treating one service provider or group of service providers unfairly by delaying action on their applications.

After the end of each quarter, the PA provides to E&Y a list of all assignments (initial, growth, and CO Code) that occurred within the previous quarter, as well as a list of all assignments that had a Part 4 due within the previous quarter. The auditors review the data and select 25 random assignments and 25 entries from the reclamation list for further review. For those selected, the PA provides the following documentation:

Assignments:

- Initial - the Part 1A and the Part 3
- Growth – the Part 1A, MTE and the Part 3
- CO Code – the Part 1, Part 1A, PA MTE, SP MTE, PA suspended Part 3 and Part 3 with an assignment

Reclamation:

- Part 4 form, reminder notice and 2nd overdue notice if applicable.
- The Part 1A and Part 3 if the block was returned.

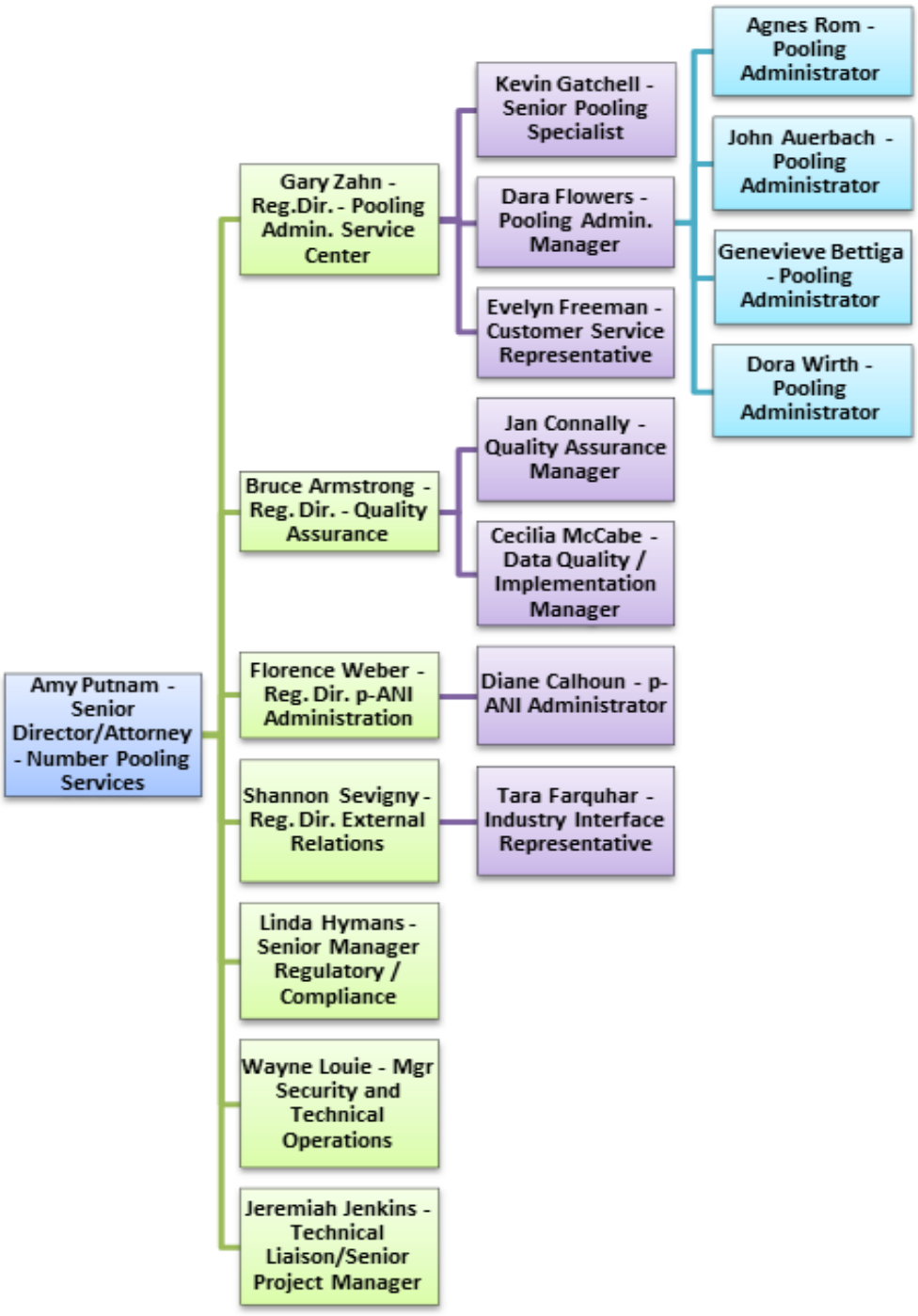
E&Y then examines the documentation to ensure that the PA:

- Adhered to the seven calendar day processing window for block and CO Code applications,
- Has proper documentation on file for the applications,
- Followed reclamation notice procedures, and
- Took effective corrective actions when necessary.

In 2013, auditors found no issues with PA processing of block or code applications or reclamation activities.

1.6 Neustar Pooling Administration Organization Chart

Figure 1: Pooling Administration Organization Chart



Section 2
2013 Neustar Pooling and p-ANI Administration Highlights and Significant Milestones

> "Every NeuStar Pooling employee with whom I interact will consistently go above and beyond the call of duty to assist me with any issue or query I have. Their follow up is always prompt and professional. They also proactively alert me to potential problems (i.e. inordinately large requests), which I very much appreciate. In short, they make my job (and by extension my work life) far easier."
>
> 2013 PA Survey Comment

The following are Neustar Pooling Administration (PA) and P-ANI Administration (p-ANI) 2013 highlights and significant milestones:

- **Pooling Contract:**
  - The FCC issued two contract extensions in 2013: (1) on February 14 for four months from 2/15 through 6/14, and (2) on June 13 for one month from 6/15 through 7/14.
  - The solicitation for the pooling contract was posted to the Fedbizops website on April 26 with a due date of May 28. The deadline for proposals was later extended to June 5 in conjunction with responses to potential bidders' questions. Neustar submitted its proposal on June 5.
  - On July 12, the FCC awarded Neustar its third contract for Pooling and Routing Number (p-ANI) Administration services effective July 15, 2013. The contract includes a one-year base period ending July 14, 2014 and three one-year option periods ending July 14, 2017.
  - We submitted all eight Contract Data Requirements List (CDRL) plans and system user documentation to the FCC on time.

- **Pooling Administration (PA) Highlights for 2013:**

In 2013, the PA staff:

★ Processed:

- 137,375 Part 3s, which is the highest annual total of applications processed since national pooling began.
  - This total represents 3.7% more than the 2011 previous record total of 132,429.
- 100% of those applications on time.
- 6,230 donations.
- 46,803 requests for new resources (containing both multiple block and code requests).
  - Assigned 47,326 blocks.
  - Opened 2,611 NXX codes.
- 50,933 change requests.
- 33,550 disconnects.

★ Number of Part 3s processed by response type:
- 108,500 approvals.
- 23,898 suspensions.
- 1,873 withdrawals.
- 2,025 block or code request denials.
  - 240 were Red Light Rule denials.

★ Authorized to reclaim 67 blocks.

♦ **Pooling Administration System (PAS) System** (See Section 6.1)**:**

★ PAS was available for use 99.98% of the time, which exceeded the contract performance metric of 99.9% by 80.5%.

★ PAS was unavailable for two instances of unscheduled down time on January 25 and 26 for a total of one hour and 45 minutes.

★ We conducted maintenance on PAS two times; on February 25 and March 25, and experienced no down time in conjunction with the maintenance activities.

★ We implemented Change Order 23 on April 5, which added a new Over-Contaminated Block Exception radio button on the MTE Form. This was done with no PAS down time.

★ We implemented part of Change Order 24 on July 19 which included FTP enhancements. This was done with no PAS down time.

♦ **Reporting** (See Section 9)**:**

★ We produced 66 requested ad hoc reports in less than one business day, although we are allowed up to three business days.

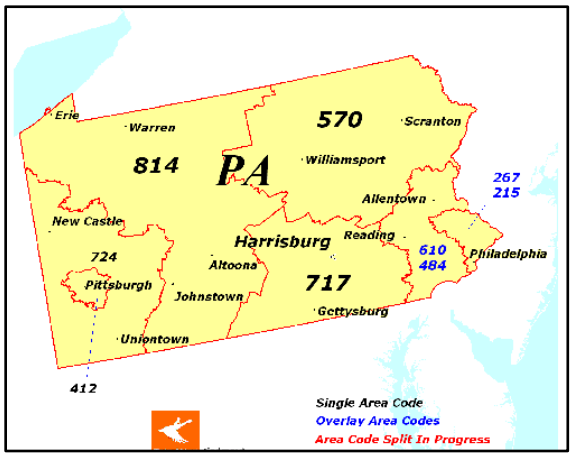
★ We produced 698 reports for the FCC, states, the North American Numbering Council (NANC), North American Numbering Plan Administration (NANPA), and service providers.

★ We submitted all 123 required Contract Data Requirements List (CDRL) reports on time and posted them to the website.

★ We submitted all 54 additional contract-required reports on time and posted them to the website.

- **Industry Support:**

  - We participated in 62 industry meetings either in-person or by conference call. (See Section 8.2)
  - We answered 100% of the 3,868 received calls within 1 business day.
  - The Help Desk handled 1,958 calls. (See Section 8.7.1)
  - We opened two pooling trouble tickets and closed three. (See Section 8.8.1)
  - We submitted 13 new issues and 17 new contributions at the Industry Numbering Committee (INC). (See Section 8.2)
  - We provided 31 pooling status reports to the NANPA for its meetings. (See Section 2.4)
  - We attended 19 NANPA meetings relating to NPA relief and jeopardy, providing an up-to-date pooling status for the affected NPAs. (See Section 2.4)
  - We made 963 changes to rate center information, of which 50% changed the pooling status designation from Excluded to Optional. (See Section 2.4.2)
  - The PA staff met monthly with the Numbering Oversight Working Group (NOWG) in 2013, providing updates on various PA activities and providing responses to questions. We also participated in the annual performance review and worked cooperatively with the NOWG to make desired industry improvements while also meeting our contractual requirements. (See Section 8.3)

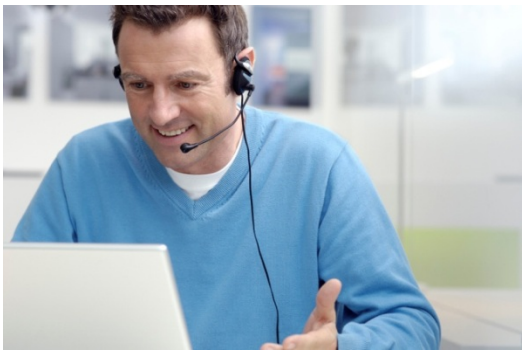


- **Customer Focus:**

  - We continued sending Tips-of-the-Quarter. (See Section 8.5.1)
  - We noted 171 significant PA and p-ANI customer focus items. (See Section 8.3)
  - We received an average score of 4.6 out of 5 on our annual performance survey, which is consistent with surveys results in previous years. (See Section 8.6)
  - We had no formal complaints. (See Section 8.4)

- **Training:**

  - We facilitated four state regulatory commission educational sessions on pooling issues. (See Section 2.5.2)
  - There were 330 views of the pooling training videos in 2013. (See Section 2.3.3)



- **Special Projects:**

- During 2013, Neustar began development on an enhanced Pooling Administration System (PAS) as part of the new contract. Work for the new system included writing the new system functional requirements and developing user testing procedures. Release of the system enhancements is scheduled to occur by January 2015. (See Section 2.7.4)

- We completed the fourth Very Old Overdue Part 4 Project on September 3 after resolving all 188 overdue Part 4s. (See Section 2.7.1)

- We completed a very complex change in MSA designations project which involved hundreds of rate center designation changes. (See Section 2.7.2)

- We took on the additional responsibility for implementation of the FCC-initiated VoIP trial. On June 17, the FCC issued the notice about the approved plans. In addition to education for the VoIP providers, we issued 67 Part 3s during the trial period of June 17 through December 17, 2013. (See Section 2.7.3)

- We continued the *Seeking Donations Project* that was initiated in May 2010. In 2013, we secured block donations for 58 of the requested 68 rate centers being changed from Excluded to Optional, thereby saving the opening of 58 whole NXX codes. (See Section 2.7.5)

- **P-ANI Administration Highlights for 2013:**

  - 16,548 applications processed (Part 3s issued).
  - 100% of those applications processed on time.
  - 3,328 new p-ANI range assignments made.
  - 2,227 modifications made to existing p-ANI ranges.
  - 10,774 p-ANI range returns processed.
  - 4 requests to cancel p-ANI return.
  - 11 requests denied.
  - 46 requests withdrawn.
  - 158 requests suspended.

- **Other p-ANI Activities in 2013:**

  - We worked with carriers to resolve data discrepancies.(See Section 2.8.3.1)
  - We continued working on reconciling duplicate assignment issues. (See Section 2.8.3.3)
  - We worked with carriers during the government shutdown while we were unable to access the FCC website and had to suspend applications. (See Section 2.8.3.2)
  - We processed carriers' annual reports and semi-annual forecasts. (See Section 2.8.2.1)

- We participated in the Emergency Services Interconnection Forum (ESIF), where the Sr. Director is co-chair of the ECDR subcommittee, and attended INC meetings, to offer assistance and expertise. (See Section 8.2)
- Completed and posted the 2013 p-ANI Activity and Projected Exhaust Report. (See Section 2.8.4)
- We continued publishing the p-ANI *Tip of the Month*. (See Section 8.5.2)

- **Routing Number Administration System (RNAS)** (See Section 6.2):

  - RNAS was available for use 99.97% of the time, which exceeded the contract performance metric of 99.9% by 71%.
  - RNAS had three instances of unscheduled down time on January 25, January 26 and May 30 for a total of two hours 39 minutes.
  - We conducted maintenance on RNAS eight times; on February 25, March 25, May 2, May 30, August 20, November 12, November 15 and December 4. For these eight maintenance activities, we used approved scheduled downtime only once -- 59 minutes and 39 seconds on March 25.

Following is a synopsis of the major accomplishments of the Neustar national Pooling (PA) and P-ANI Administrator (P-ANI) teams during the 2013 reporting period. Details for these activities are found throughout the report. PA activity begins in Section 2.2 and P-ANI activity starts in Section 2.8.

> Overall, the PA's that I work with have been great, respond quickly and demonstrate a high level of professionalism – no complaints.
>
> 2013 PA Survey Comment

2.1 Pooling Administration

2.1.1 Contract

Neustar worked under two different contracts in 2013. CON07000005 governed through July 14, 2013, and beginning on July 15, 2013, the PA began to operate under FCC13C0007. The new contract, while similar in scope to the previous, includes significant enhancements to the Pooling Administration System (PAS), many suggested by users and incorporated into the contract through the Neustar proposal. In addition to the usual job responsibilities and the additional responsibility for managing a VoIP trial, Neustar personnel worked industriously on developing requirements for the updated PAS in 2013.

Furthermore, the PA is required by the new contract to submit numerous plans that are enumerated in Section 4, Contract Data Requirements List (CRDL) (Deliverables) of Attachment A of the contract.

The following is a list of CDRL plans that were submitted on-time to the FCC in 2013:

Report Name	Section Reference	Required Interval	Dates Submitted
System Acceptance Plan	CDRL 4.7	Within 30 days of contract award	Aug 13
Security Plan	CDRL 4.2	Within 45 days of contract award	Aug 28
System Documentation Plan	CDRL 4.3	Within 60 days of contract award	Sep 13
Disaster/Continuity of Operations Plan	CDRL 4.4	Within 60 days of contract award	Sep 13
Statistical Forecasting Plan	CDRL 4.5	Within 60 days of contract award	Sep 13
Management Reporting Plan	CDRL 4.6	Within 60 days of contract award	Sep 13
QA Plan	CDRL 4.8	Within 120 days of contract award	Nov 8
Maintenance Plan	CDRL 4.10	Within 180 days of contract award	Dec 6

Additionally, we submitted system user documentation to the FCC on October 10, as required by contract Section 3.19.

2.1.2. Personnel

There were no changes in PA personnel in 2013.

2.2 Pooling Administration (PA)

This section describes PA activity in 2013, 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, *Trends in Pooling Since 2009*.

2.2.1 Pooling Administration Productivity for 2013

In 2013, the PA continued its exceptional level of performance. In fact, we processed a record number of applications (Part 3s), exceeding 2011's record number of 132,429 by 4,946 Part 3s. Table 2-1 identifies areas of activity:

Table 2-1
PA Productivity at a Glance

ACTIVITY	2013 TOTAL
Applications processed (Part 3s):	137,375
Applications not processed in 7 calendar days:	0
Blocks assigned:	47,326
Change requests to existing blocks or codes:	50,933
Disconnects processed:	33,350
Withdrawals:	1,873
Block or code requests denied:	3,104
Donations processed:	6,230
Central office codes opened:	2,611
Red Light Rule denials:	240
Total blocks reclaimed:	67

Table 2-2 shows a breakdown of applications (Part 3s) by disposition type, including approvals, denials, suspensions and withdrawals. This total is the highest of all years since national pooling began.

Table 2-2
Applications (Part 3s) Processed

Approvals	108,500
Denials	3,104
Suspensions	23,898
Withdrawals	1,873
TOTAL	**137,375**

Table 2-3 and Figure 2 contain the total number of applications processed by activity type.

Table 2-3
2013 Applications Processed by Type

	Approved	Denied	Suspended	Withdrawn	Total
Block Modifications	41,955	96	-	570	42,621
Block Disconnects	14,934	207	15,406	304	30,851
Block Cancel Disconnect	14	1	-	-	15
Individual Blocks	38,878	1,398	-	422	40,698
Block Reservations	69	22	-	13	104
Process/Cancel Block Reservations	63	8	-	3	74
Code Modifications	3,932	117	4,057	206	8,312
Code Disconnects	179	624	1,674	22	2,499
LRN Blocks	1,007	210	570	101	1,888
Dedicated Customer Blocks	570	67	60	21	718
Pool Replenishment Blocks	6,871	350	2,131	211	9,563
Manual	28	4	-	-	32
Totals	**108,500**	**3,104**	**23,898**	**1,873**	**137,375**

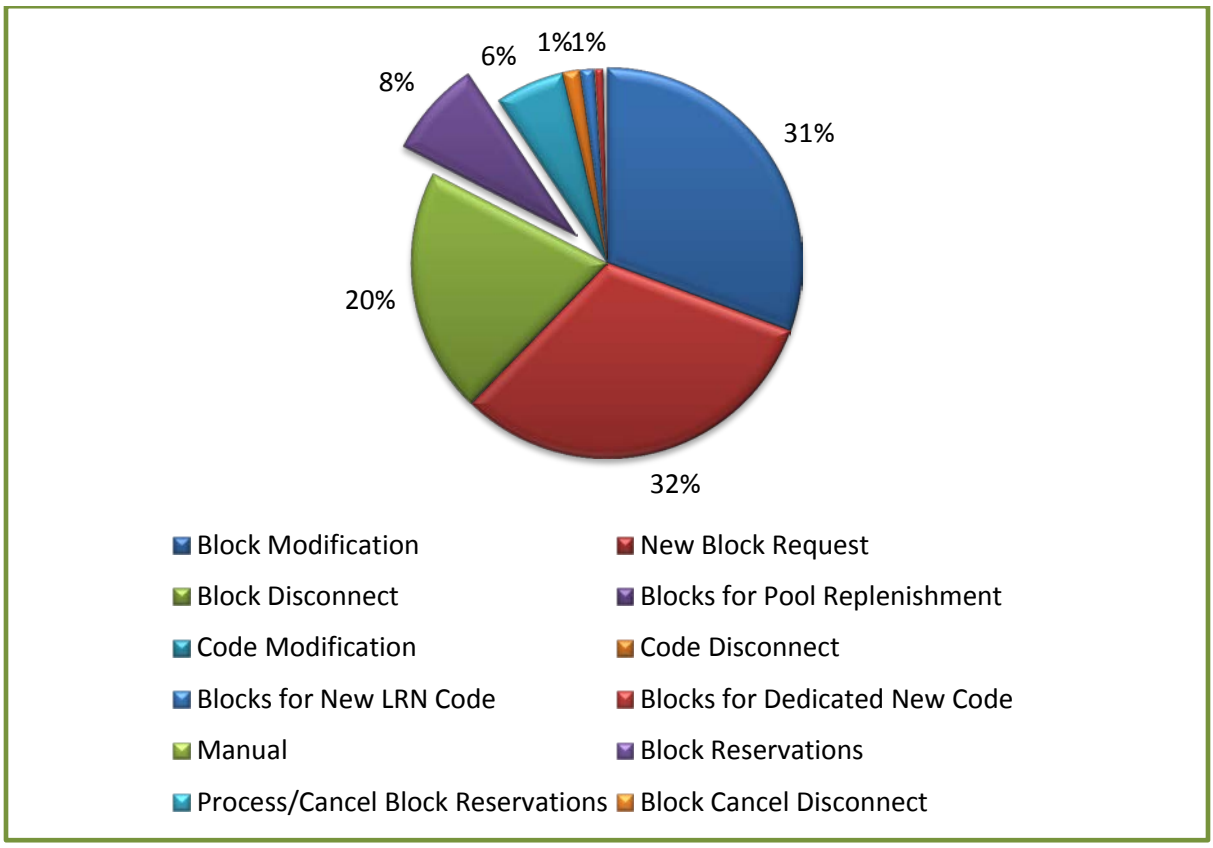


Figure 2: 2013 Pooling Applications by Type

Table 2-4 shows the number of NXX codes opened by the PA in 2013 and for what purpose.

Table 2-4
NXXs Opened by Purpose

PURPOSE	TOTAL	PERCENT OF TOTAL
LRN	532	20%
Dedicated Customer	75	2%
Pool Replenishment	2,071	78%
TOTAL	2,588	100%

The PA also issued 15,627 Part 5s for block disconnects, reclamations, and exchanges during 2013, of which 14,930 were actual block disconnects.

The PA processed 100% of the 137,375 applications (Part 3s) within seven calendar days, which far exceeds the performance metric of 99%. This performance percentage was changed in the new contract from 97% to 99%.

There were 401,186 assigned blocks in PAS at the end of 2013 as compared with 368,661 at the end of 2012, an increase of 32,525 assigned blocks. This equates to an 8.8% increase in the number of assigned blocks in PAS at the end of 2013 as compared to the 2012 total.

Figure 3 below shows the monthly cumulative number of assigned thousand-blocks in PAS for 2013.

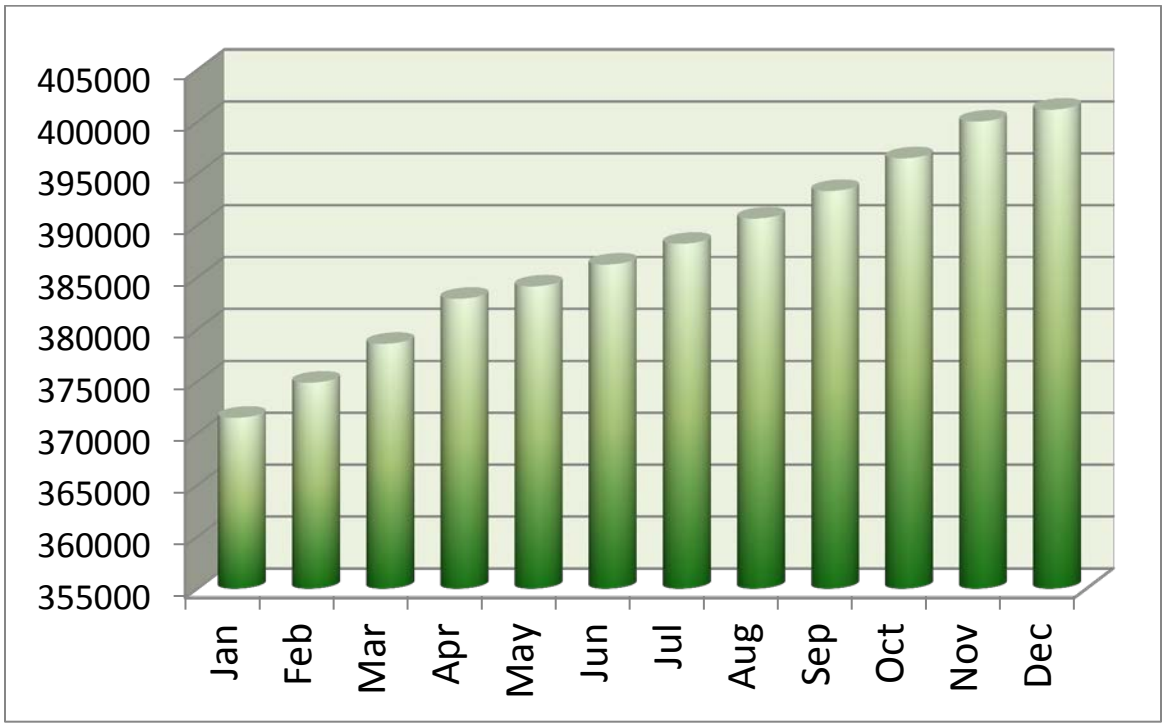


Figure 3: Monthly Cumulative Blocks Assigned in PAS in 2013

Figure 4 below depicts the monthly block assignments made by the PA during each month in 2013.

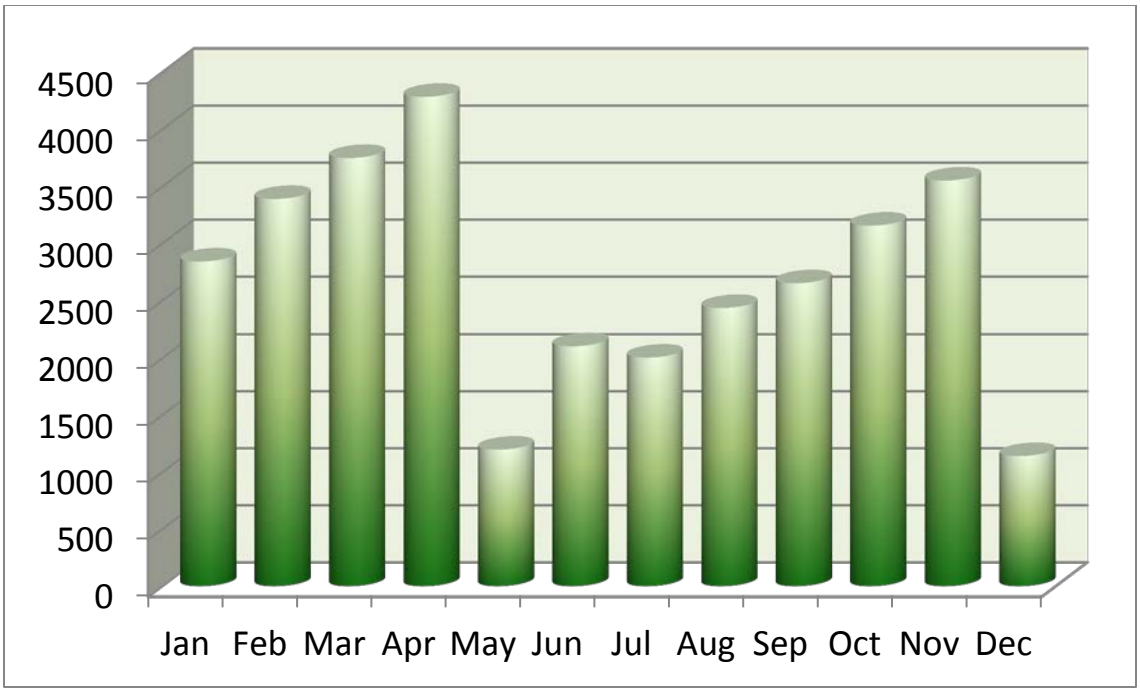


Figure 4: Blocks Assigned by the PA in Each Month in 2013

The total number of applications (Part 3s) 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, as a routine part of their job performance, 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,
- Assist service providers with questions relating to PAS,
- 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,
- Search for new code holders for pooled codes and blocks that have been abandoned,
- 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, and
- Work closely with the NANPA Code Administrators to ensure that NXX requests are handled in accordance with INC guidelines.

Figure 5 below provides a complete overview of all applications processed in PAS for 2013, including approvals, denials, withdrawals, and suspended applications.

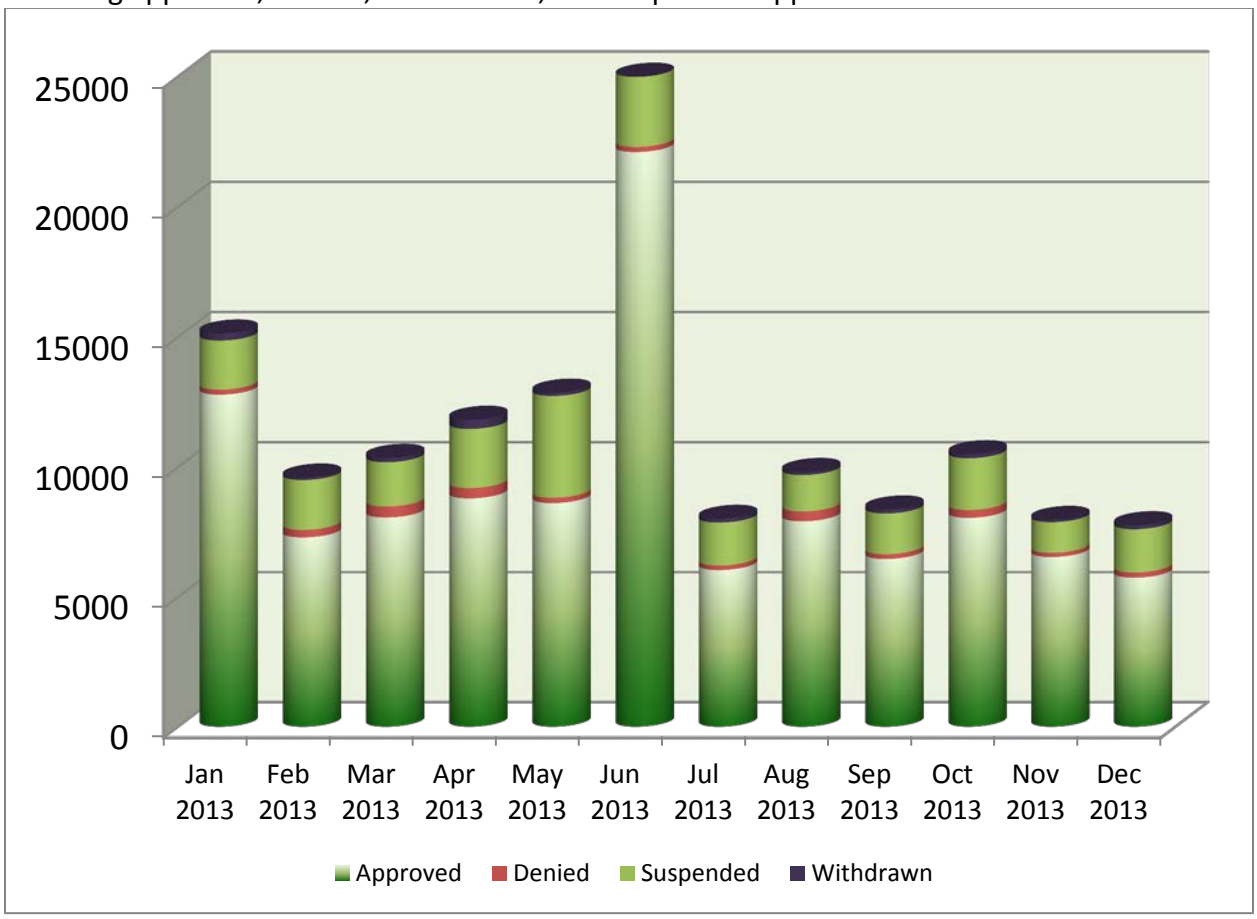


Figure 5: Overview of All 2013 Applications Processed by Status

Tables 2-5 and 2-6 list the ten states and Numbering Plan Areas (NPAs) for which the highest number of applications (Part 3s) occurred in 2013:

Table 2-5
Ten States with Highest Number of Applications (Part 3s)

State	Total Part 3s
CA	15,031
TX	11,444
NY	7,962
IL	7,231
OH	6,479
MA	6,164
PA	6,060
FL	6,043
MI	6,003
NJ	4,418

Table 2-6
Ten NPAs with Highest Number of Applications (Part 3s)

NPA	State	Total Part 3s
832	TX	1,778
978	MA	1,233
207	ME	1,223
267	PA	1,164
443	MD	1,138
781	MA	1,134
918	OK	1,058
440	OH	1,046
774	MA	1,022
484	PA	1,021

2.2.2 Pool Replenishment

During 2013, the PA continued to make pool replenishment options available to service providers when required to keep inventories adequate to meet forecasted demand.

While the PA has no authority to actually replenish the inventory pools because it is not authorized to obtain resources directly, we manage the process by determining when a pooling rate center inventory will either be equal to or 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.

There was a 4% decrease in the number of applications for blocks for pool replenishment in 2013 as compared to 2012, and the number of codes opened for pool replenishments dropped 2%.

Table 2-7 is an overview of pool replenishment statistics in 2013.

Table 2-7
2013 Pool Replenishment Overview

Average number of rate centers per month that had less than a six-month inventory	740
Percentage of total number of rate centers per month that had less than a six-month inventory	4.0%
Average number of rate centers per month that had no blocks available	220
Number of CO code requests for pool replenishment	2,536
Number of CO codes opened for pool replenishment	2,022

Tables 2-8 and 2-9 show the ten states and NPAs which had the most pool replenishment activity in 2013.

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

State	Codes Opened
CA	255
TX	235
MI	142
NY	137
OH	127
IL	124
FL	118
PA	63
KS	59
AZ	50

Table 2-9
Ten NPAs with the Most Pool Replenishment

NPA	State	Codes Opened
440	OH	42
832	TX	40
906	MI	40
347	NY	40
214	TX	37
316	KS	37
224	IL	32
308	NE	26
281	TX	25
313	MI	23

2.2.3 Reclamation in 2013

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 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 10th 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.[1] There were a cumulative total of 6,145 blocks that the PA had to address on the overdue Part 4 reports in 2013. This represents a decrease of 19% of the 2012 total of 7,631. Of those, a cumulative total of 1,921 blocks were

[1] The FCC Report and Order and Further Notice of Proposed Rulemaking released March 31, 2000 (1st 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.

new to the lists in 2013, which is a 23% decrease from the 2012 total of 2,508. A state may authorize the PA to initiate block reclamation, but then may halt the reclamation process if, for example, it is determined that numbers in the blocks are actually in service.

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

In 2013, regulators authorized the PA to initiate reclamation for 67 thousands-blocks.

Table 2-10 identifies the state where blocks were authorized to be reclaimed and the number authorized in each state in 2013.

Table 2-10
State and Number of Blocks Reclaimed

State	Blocks for which Reclamation was Initiated in 2013
Colorado	17
New Jersey	15
Virginia	11
Pennsylvania	9
Washington	4
Massachusetts	3
California	3
Illinois	2
Oregon	1
Florida	1
District of Columbia	1
TOTAL	**67**

2.3 Pooling Administration System (PAS)

2.3.1 PAS Performance

As set forth in more detail in *Section 6*, PAS was available 99.98% of the time in 2013, which means the PA once again exceeded the contract requirement of 99.9% availability.

2.3.2 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 is 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 30 days of any changes to the INC Guidelines that have such an impact.[2]

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

The PA submitted no change order proposals to the FCC in 2013. However, we did submit a letter in lieu of a change order for INC Issue 740. The process requires the PA to identify the block holders and the carriers to which numbers have been ported (through interaction with the NPAC), and then to create, send, and track multiple emails to the affected service providers (first to the block holders and then to the ported TN holders) to attempt to find someone willing to accept the administrative responsibilities related to being the code holder. This is a time-consuming process. We do not know how much this change will increase our current workload. If this change causes the workload to be increased significantly, we may need to hire additional staff to accommodate the extra work. We plan to inform the FCC if the need to submit a change order arises.

Because there were no change orders submitted in 2013, the FCC did not need to act on any change orders.

2.3.3 Training Videos

While we did not add any new training videos in 2013, we continue to see robust viewing of the existing videos. By far, the most popular video is "New to Pooling Quick Start." In all there were 330 total views of training videos in 2013. This total does not include downloaded or shared videos as there is no method for tracking those.

Table 2-11 contains the 2013 training video names and the number of times each video was viewed.

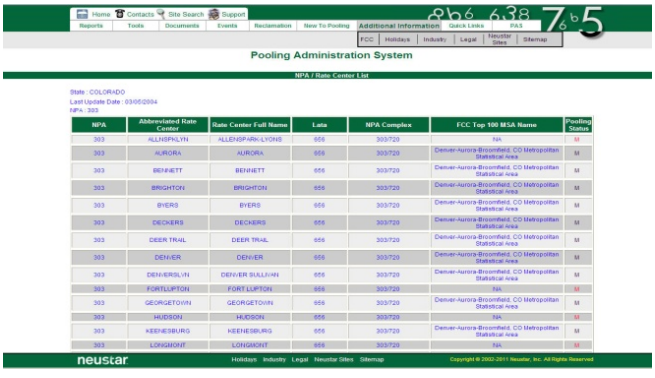
[2] FCC contract No. FCC13C0007, Section 2.5.4 of Attachment A dated May 15, 2013.

Table 2-11
2013 PAS Training Video Views

Training Video	Number of Times Viewed
New to Pooling Quick Start	108
Mass Modifications	27
Change Order 20	12
How to Complete the MTE Worksheet	71
PAS Effective Date Scenarios for Block Requests and Donations	17
PAS Password Reset	14
Change Orders 9 and 10	3
Change Order 11	4
Redesigned Nationalpooling.com Website Training video	20
Overview of PAS and the Pooling Website for Service Provider and Service Provider Consultant Users	37
Overview of PAS and the Pooling Website for Regulatory Users	17
TOTAL VIEWS	**330**

2.3.4 Pooling Help Desk

The Customer Support Representative (CSR or Help Desk) is the human interface between 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 2013, the Customer Support Desk handled 1,958 calls from customers. For more details on Help Desk calls please see Section 8.7.1.



2.4 Pooling Implementation Management

The Data Quality and Implementation Manager (DQIM) manages the quality control and maintenance of the rate center data located on the website, completes the semi-annual

forecasting reports, updates PAS in the event of area code relief, and provides status updates for the industry at NANPA meetings. In 2013, the DQIM also attended 19 NANPA meetings, and provided 31 pooling status reports to the NANPA for its meetings.

2.4.1 Rate Center Data Quality Control and Maintenance

The NPA/Rate Center Reports identify the pooling participation level status designation of all rate centers 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 center (Mandatory Single Service Provider), or where pooling is not required, but either the state or a carrier has requested that the rate center be opened in PAS (Optional), or no carrier has chosen to pool (Excluded).

The six current status designations of rate centers as defined in the *NPA/Rate Center Reports* are:

- **Mandatory (M)**
- **Mandatory State (M)**
- **Mandatory Single Service Provider (M*)**
- **Mandatory State Single Service Provider (M*)**
- **Optional (O)**
- **Excluded (X)**

For status designation definitions see Section 3.

Table 2-12 shows the total number of distinct pooling rate centers in PAS that are maintained by the DQIM from 2009 through 2013.

Table 2-12
Total Number of Distinct Pooling Rate Centers in PAS – 2009 – 2013

STATUS DESIGNATION	2009	2010	2011	2012	2013
M*	441	427	420	397	408
M	4,891	4,885	4,891	4,914	5,044
O	5,747	6,074	5,679	5,774	6,089
M	2,848	3,116	3,498	3,525	3,505
M*	647	646	841	808	773
X	4,023	3,401	3,217	3,122	2,719
Total	**18,597**	**18,549**	**18,546**	**18,540**	**18,538**
Total Pooling Rate Centers	**14,574**	**15,148**	**15,329**	**15,418**	**15,819**
Total Mandatory Pooling Rate Centers	**7,739**	**8,001**	**8,389**	**8,439**	**8,549**

2.4.2 Rate Center Information 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 rate centers that occur as a result of FCC and state orders and Office of Management and Budget (OMB) directives.

2.4.2.1 Changes to Rate Center Information

Changes to rate center file information have been available in real-time through the website since September 2008. In 2013, the PA made 963 rate center information changes. Of those 963 rate center changes, 700 were rate center status designation changes, of which 69% were changing rate centers from Excluded to Optional. Of the remaining 263, three were new rate centers and 260 were a result of MSA name changes. There was one Supplemental Implementation Meeting (SIM) in 2013, for the Montana 406 NPA.

Table 2-13 shows the type of information change and how many rate centers were changed during each month in 2013.

Table 2-13
Summary of Rate Center File Changes for 2013

RATE CENTER CHANGES 2013	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Changes in Status:													
M* to M			2				2		5		5	2	16
M* to M		8	2			3	5	5	9	4	6	4	46
M to M*													0
M to M*													0
M to M						57							57
M* to M*						1							1
O to M					2	67							69
O to M*						26							26
O to M													0
O to M*													0
													0
O to M*													0
X to M													0
X to M*													0
X to M*													0
X to O	9	30	22	42	11	6	202	2	138	11	7	5	485
REASON:													0
New Rate Centers							3						3
													0
Rate Center Name Change													0
													0
MSA/LATA Changes					260								260
TOTALS	**9**	**38**	**26**	**42**	**273**	**160**	**212**	**7**	**152**	**15**	**18**	**11**	**963**

2.4.2.2 Changes to Metropolitan Statistical Area (MSA) Rank and Name

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. The OMB usually releases any updates to the definitions and/or composition (*i.e.,* counties or other political divisions) of Metropolitan Statistical Areas (MSAs) once per year. These bulletins can contain any or all of the following:

- Changes to the composition of a specific MSA
- Creation of new MSAs
- Deletion of an MSA where a political division has been reassigned to another or newly-created MSA
- Renaming of MSAs based on city populations (each MSA name contains up to three principal cities in decreasing order of population). This usually amounts to reordering of city names or the removal or addition of principal city names.

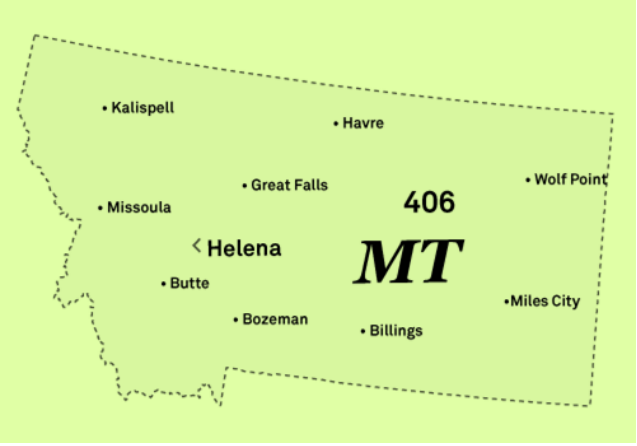
There was one major bulletin issued by the federal Office of Management and Budget (OMB) in 2013, which changed many MSA name and many new rate center-to-MSA associations. (See Section 2.7.2 for more details)

Also, the updated 2012 Census estimate was issued and thus allowed the recalculation of the top 100 MSAs based on these new census figures.

MSAs may be added to the top-100 list, thereby making the affected rate centers mandatory, but the mandatory status of rate centers that were associated with MSAs, but drop out of the top 100, does not change.

2.4.2.3 Supplemental Implementation Meeting (SIM)

The FCC granted additional delegated authority to the Public Service Commission of Montana (Commission) on May 23. The Commission issued an order directing the PA to implement the additional delegated authority on August 13, and we scheduled the SIM for September 19 and emailed the notice and meeting materials on August 20.



At the SIM, which was attended by 21 participants from 16 companies, the implementation schedule set a pool start date of

January 13, 2014, and the DQIM conducted a pooling process overview for service providers unfamiliar with pooling. The DQIM continues to respond to questions and assist the service providers with resolving implementation concerns.

2.4.4 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 Section 6.0 of the TBPAG 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 the PA for each of their separate Operating Company Numbers (OCNs) at the thousands-block level, per rate center, 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 2013, the PA aggregated the data provided by the service providers at the rate center level for all NPAs in pooling. We used this data to provide a rate center level NRUF to NANPA and to determine if a critical industry inventory insufficiency existed within any rate center. 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, well before the required February 21 and August 21 dates. Table 2-14 contains the PA NRUF/forecast results for both semi-annual reporting periods in 2013.

Table 2-14
NRUF/Forecast Results for 2013

Date	NPAs	Jurisdictions	Blocks Forecasted	Blocks Available	Codes Forecasted
February	294	52	51,430	163,434	3,173
August	294	52	42,273	167,956	2,318

2.5 Regulatory and Compliance

2.5.1 Regulatory Update Conference Calls

In 2013, the PA participated in five regulatory update conference calls: on February 7, April 11, June 13, September 12, and December 12. Topics included updates on pooling administration activities, delegated authority petitions, p-ANI administration, the PA Survey, and relevant INC issues.

2.5.2 Regulatory Educational Sessions

In 2013, the PA conducted three educational sessions about pooling and one VOIP trial overview via conference call for state regulatory personnel. Our goal in conducting training sessions for regulators is to make it easier for them to respond to thousands-block pooling issues in their states. During the pooling educational sessions, we reviewed various pooling processes and procedures such as reclamation, forecasting, and applications processing, in addition to the information and reports available through the website. For the VOIP trial educational conference call we educated the state commission staff in affected states about trial processes and procedures.

Table 2-15 summarizes the regulatory educational sessions facilitated by the PA in 2013.

Table 2-15
Regulatory Training Sessions in 2013

Date	State	Type	Description
March 18	California	Conference call	Pooling overview
June 19	Multi	Conference Call	VoIP Trial overview
August 29	Puerto Rico	Conference call	Pooling overview
October 23	Nebraska	Conference call	Pooling status update and education

2.5.3 Regulatory Support

During 2013 the PA provided support for state regulators as they addressed number conservation and NPA relief planning issues. We also attended NANPA meetings relating to NPA relief and jeopardy, and responded to emails and telephone inquiries regarding issues such as application processing, certification, and reclamation.

2.5.3.1 Addition Delegated Authority

The Public Service Commission of Montana (Montana Commission) filed a petition on November 22, 2011 seeking additional delegated authority to implement mandatory thousands-block pooling. The FCC granted the petition on May 23, 2013. We immediately conducted a conference call with Montana Commission staff to review the next steps in implementing the delegated authority.

On June 10, the Montana Commission issued a notice requesting comments on the implementation of additional pooling, with comments due July 3. Then, on August 13, it issued an order directing the PA to implement the additional delegated authority. As a result, we held the Supplemental Implementation Meeting (SIM) on September 19. At

the SIM the pool start date was determined to be January 13, 2014 and we conducted an educational overview for service-providers unfamiliar with pooling.

We continue to support this effort, responding to questions and assisting the Montana Commission staff with resolving implementation issues that are presented to them. The Commission staff has granted an extension to the established timeline for three carriers.

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. The FCC determined that numbering resources constitute a benefit, and 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 240 denials as a result of the Red Light Rule in 2013, which is a significant decrease from 1,241 in 2012.

2.5.5 Reporting Compliance

The FCC contract directs that certain Contract Data Requirements List (CDRL) reports and other reports be submitted each year.

2.5.5.1 Contract Data Requirements List (CDRL) – Recurring Reports

The following CDRL reports must respectively be submitted annually, semi-annually, quarterly, or monthly. Table 2-16 contains the CDRL recurring reports that were submitted by the PA during the 2013 calendar year according to the established deadlines. In 2013, the PA submitted 123 CDRL reports, which are available on the PA website.

Table 2-16
Recurring CDRL Reports Submitted in 2013

Report Name	Section Reference	Required Interval	Dates Submitted
Staffing Report	CDRL 4.6.4.3 per Section 2.3	1st working day of the month	Jan 2, Feb 1, Mar 1, Apr 1, Apr 30, Jun 3, Jul 1, Aug 1, Sep 3, Sep 30, Oct 31, Dec 2
Thousands –Block Pooling Report	CDRL 4.6.4.1 per Section 2.21 Also see 2.22.4.5	Monthly	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
System Performance Report	CDRL 4.6.4.2 per Section 2.22 Also see 2.22.4.5	Monthly	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
Ad Hoc Reports	CDRL 4.6.5 per Section 2.22.4.5, as modified by Contract Mod #3	Monthly	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
Pooling Matrices Report	CDRL 4.6.3.1 Per Section 2.21.2 Also see 2.22.4.5	Quarterly	Jan 15, Apr 15, Jul 15, Oct 15
Forecasted Demand	CDRL 4.6.2.1 Per Section 2.17.1	Semi-Annual	Feb 13 and Aug 15
Rate Area Inventory Pool Status	CDRL 4.6.2.2 and Section 2.16.5	Semi-Annual	Feb 13 and Aug 15
Annual	CDRL 4.6.1 Per Section 2.21.1	Annual	Mar 28
By Request *(Ad Hoc)*	CDRL 4.6.5 Per Section 2.21.3	Within three business days	January (7 reports) February (5 report) March (6 reports) April (7 report) May (7 reports) June (5 reports) July (4 reports) August (4 reports) September (5 reports) October (7 reports) November (5 reports) December (4 reports)

2.5.5.2 Other Required Reports

Table 2-17 lists the 54 other reports required by the contract that the PA submitted in 2013.

Table 2-17
Other Required Reports Submitted in 2013

Report Name	Section Reference	Required Interval	Where	Dates Submitted
Staffing Report	Section H.3.3	Monthly	To FCC only	Jan 2, Feb 1, Mar 1, Apr 1, Apr 30, Jun 3, Jul 1
Progress Report	Section G.5	Monthly by the 15th of the month	To FCC only	Jan 15, Feb 15, Mar 14, Apr 15, May 14, Jun 13, Jul 15
Monthly Pooling Metrics	Section 2.22.4.5	Monthly	To PA Website only	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
p-ANI Monthly Report	Change Order 19 Section 4	Monthly	To FCC	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
RNAS Performance	Change Order 19 Section 4	Monthly	To FCC	Jan 15, Feb 15, Mar 12, Apr15, May 14, Jun 17, Jul 15, Aug 15, Sep 16, Oct 15, Nov 15, Dec 16
Quarterly Pooling Metrics	Section 2.22.4.5	Quarterly	To PA Website only	Jan 15, Apr 15, Jul 15
Inventory	Per Section 3.21	Annual	To FCC	Jun 23

2.6 Annual PA Performance Survey

As part of the ongoing focus on customer satisfaction, the PA publishes 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.

The overall average score for the four statements was 4.6 out of a possible 5.0, which is consistent with previous survey results.

For further details on the annual PA survey, see Section 8.6.

2.7 Special Projects in 2013

2.7.1 Very Old Overdue Part 4 Project:

We sought and received approval from the FCC on January 24, 2013 to use the same alternate process we have used three times in the past to resolve overdue Part 4s that accumulate each month and continue to roll over into the next month's report. We previously addressed this issue in 2008, 2009, and 2010. At the time we started this project, 31% (188) of the 606 blocks on the reclamation list had been overdue since prior to January 1, 2012.

We began the process of notifying affected carriers and state commissions on January 25 and the total was reduced from 188 to 43 during February. When we did not see any further reduction in March and April, we sent 12 follow-up emails on April 29 and 30, to the nine carriers with the outstanding Part 4s, giving them until May 15 to respond. While this resulted in most of the overdue Part 4s being resolved we still had three remaining. On June 10 and 14 we solicited the assistance of the three affected state commissions with the outstanding Part 4s, seeking assistance. On September 3 we received responses for the remaining overdue Part 4s and concluded the project when the last alternative Part 4 was approved. This was the first time we had completely resolved every overdue Part 4 on the list.

2.7.2 Metropolitan Statistical Area (MSA) name changes

On February 28, 2013, the Office of Management and Budget (OMB) published Bulletin OMB 13-01 entitled *Revised Definitions of Metropolitan Statistical Areas, Micropolitan Statistical Areas, and Combined Statistical Areas, and Guidance on Uses of the Definitions of These Areas*.

The changes resulting from these two information sources are as follows:

1. The names of 36 of the current top 100 MSAs were changed.
2. Two new MSAs were added to the top 100 (Deltona-Daytona Beach-Ormond Beach, FL Metropolitan Statistical Area and Winston-Salem, NC Metropolitan Statistical Area).
3. The county composition of many existing MSAs was changed, resulting in some rate centers being added to top-100 MSAs (146 rate centers), some rate centers being moved outside a top-100 MSA (248 rate centers), and some rate centers (83 rate centers) that had once been in a top-100 MSA, but had been moved out, now moved back in.
4. Of the 146 rate centers that had never been in the top 100 MSAs and had never been considered mandatory pooling by the FCC, but now are:
    a. 4 were optional and were changed to Single Service Provider Mandatory (M*);
    b. 63 were optional and were changed to Mandatory (M);
    c. 54 were State Mandatory (M) and were changed to Mandatory (M);
    d. One was State Single Service Provider Mandatory (M*) and was changed to Single Service Provider Mandatory (M*);
    e. 20 were excluded (X) and were changed to Single Service Provider Mandatory (M*); and
    f. 4 were excluded (X) and were changed to Mandatory (M).

All rate centers changing to either an M* or M were updated effective June 21, 2013.

2.7.3 VoIP Trial:

1. On April 28 the FCC issued *Numbering Policies for Modern Communications, IP-Enables Services, and Telephone Number Requirements for IP-Enabled Service Providers, Telephone Number Portability, Developing a Unified Intercarrier Compensation Regime et al* (Dkt. No. 13-97 10-90 04-36 01-92 99-200 07-243 95-116). (FCC No. 13-51).
2. The VoIP trial portion of the order took effect immediately. The comments for the NPRM and NOI will be due when the order is published in the Federal Register.
    a. We met with the FCC on May 1 to discuss questions about the VoIP trial.
    b. Six companies filed plans to participate in the trial.
3. We participated in a planning meeting with the FCC on June 5.
4. On June 17, the FCC issued the notice about the approved plans. We notified the affected state commissions about the approved plans and scheduled an overview conference call for June 19.

5. Once the five approved plans were announced:
    a. We worked with the participating companies on getting started with pooling processes (following the new service provider checklist).
    b. We worked with companies, NANPA, and the NPAC with registering the participating companies in PAS, NAS, and the NPAC.
    c. We assisted the companies with procedures for acquiring an OCN and selecting a company as its AOCN.
    d. We educated the company representatives on registering in PAS, and about application processes, including certification and proof of facilities readiness documentation. This saved the companies' time so that their applications would be approved rather than being denied due to insufficient initial documentation.
6. On June 19 we held a conference call for the nine states impacted by the approved plans for the VoIP trial. Of those states, six were represented on the call. We presented an overview of how we anticipated the trial to unfold, provided a point of contact for all trial questions and agreed to send notification to the states when resources were requested. We also agreed to send notification emails when applications were submitted.
7. Overall trial summary:
    - All approved company representatives registered in PAS.
    - All companies submitted applications for and were assigned resources for nearly all of the approved rate centers.
    - We sent notifications to the appropriate state commission for each application.
    - We issued 67 Part 3's.
    - We processed NXX code applications for 17 LRNs.
    - We assigned 5 individual blocks.
    - We made 29 calls to and received 53 calls from a total of 7 different contacts from the five participating companies.

2.7.4 System Enhancements

During 2013, we devoted a significant amount of our time and effort to enhancing PAS by incorporating a long list of enhancements suggested by service providers, regulators, and PA personnel. Over the past several years, we kept a list of survey suggestions and recommended enhancements that could not be incorporated into system builds. As part of our new contract proposal, we studied all recommendations, seeking clarification from contributors, and finalizing a list of approximately 130 specific enhancements to be incorporated into the system.

After the internal effort to understand each proposed change, we sought systems engineering input on level of effort or feasibility of each enhancement and finally settled on a list of potential final enhancements. We then enlisted the expertise of the

individuals in our group to discuss, write, and edit final system requirements for the entire PAS functionality, including all enhancements. This was all done while maintaining our everyday work commitments. We ended up with approximately 110 individual documents, totaling nearly 1,500 pages. These documents describe every detail and nuance of the quality system we are known for producing.

2.7.5 Seeking Donations Project

In a voluntary and proactive effort to prevent the unnecessary opening of NXX codes, we developed a process beginning in late May 2010 that could conserve numbers in rate centers when an incoming service provider (SP) requests that the rate center designation be changed from "Excluded" to "Optional". In this circumstance, we seek voluntary block donations from existing SP(s) in that rate center so that the incoming SP can request blocks instead of opening a new code.

In 2013, the PA attempted to secure donations for 68 rate centers being changed from Excluded to Optional. We were able to obtain donations for 58 of those rate centers, thereby potentially saving the opening of 58 NXX codes.

At times a carrier will also contact us to request that we seek donations in a pooling rate center that has no blocks available but is not "excluded" from pooling, to prevent the opening an NXX code. This is especially useful in low population areas where blocks added to the available pool may never be utilized. In 2013, we sought donations in four rate centers, and received and processed such a donation in one rate center.

2.8 Routing Number Administration (aka p-ANI)

2.8.1 Background

The PA assumed the responsibility of assigning Emergency Service Query Keys (ESQKs) under certain limited circumstances as the Interim Routing Number Administrator (IRNA) on September 6, 2006. When the FCC awarded the new PA contract in August, 2007, it included the provision that the new national PA would act as the permanent p-ANI Administrator (a/k/a Routing Number Administrator or RNA) at such time as the FCC directs the permanent process.

The PA began the development process for the first national Routing Number Administration System (RNAS), the p-ANI Administration website and p-ANI administration processes when the FCC approved the permanent process in Change Order 19 on June 17, 2011. RNAS went live on March 19, 2012, and is accessible from

the dedicated p-ANI website. The website is not only the gateway to the RNAS but contains public information such as reports and documents. The P-ANI Administrator also trains users to understand what types of documentation are required to assure that applicants are eligible in the areas in which they are requesting p-ANIs.

2.8.2 2013 P-ANI Administration Highlights:

2.8.2.1 Productivity for 2013:

In 2013, the P-ANI Administrator not only processed applications but also carriers' annual reports and forecasts. The forecasts are used to develop the *P-ANI Activity and Projected Exhaust Report* found in Section 2.8.4. We processed annual report files for 46 unique NENA ID/OCN combinations and 9 Forecast files.

Table 2-18 addresses the count of p-ANIs requested, assigned, returned, or modified on a monthly basis. This is not to be confused with the number of applications processed, which can be found in Table 2-19.

Table 2-18
Total Number of p-ANIs by Activity Type

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Requested	4,309	2,957	3,103	2,095	2,656	3,583	2,393	6,896	4,648	6,111	2,913	1,283	42,947
Assigned	4,307	2,957	3,097	2,093	2,648	3,582	2,390	6,881	4,644	5,941	2,912	1,283	42,735
Returned	2,144	4,071	5,669	4,808	1,750	2,105	1,457	20,775	61,949	18,961	11,230	2,653	137,572
Modified	56	2,834	278	1,099	1,111	627	1,423	1,171	4,540	69	1,755	20	14,983

Table 2-19
Applications Processed by Request Type

	Approved	Denied	Suspended	Withdrawn	Total
Cancel p-ANI Return Request	4	0	0	0	4
P-ANI Modification Request	2,227	0	0	3	2,230
New p-ANI Request	3,328	11	158	43	3,540
P-ANI Return Request	10,774	0	0	0	10,774
Total	16,333	11	158	46	16,548

The following table is a summary of p-ANI inventory as of December 31, 2013.

Table 2-20
P-ANI Inventory as of December 31, 2013

STATUS	TOTAL p-ANIs	211	511
ASSIGNED	723,029	365,433	357,596
AGING	3,799	3,686	113
AVAILABLE	5,226,084	2,608,252	2,617,832
UNAVAILABLE	7,088	2,629	4,459
TOTALS	**5,960,000**	**2,980,000**	**2,980,000**

2.8.3 Other 2013 P-ANI Administration Activities

In addition to processing requests for p-ANI ranges, the P-ANI Administrator performed many other functions during 2013.

2.8.3.1 Data Reconciliation

Reconciling the p-ANI data continued to be a major priority for the P-ANI Administrator in 2013; the P-ANI Administrator continued to spend many hours notifying and working with carriers to resolve data discrepancies found during the initial reporting period where no p-ANI user reported on a p-ANI range that the assignor reported as assigned and where more than one carrier reported on the same p-ANI range or part of a p-ANI range.

We continued to try to locate p-ANI users who never filed an initial report where the assignor reported a p-ANI range as being assigned to that carrier. There were 4,561 p-ANI ranges initially identified, at the end of 2013, only 183 p-ANI ranges remains to be

resolved. The p-ANI ranges were resolved by either showing the p-ANI range as assigned or by making it available.

There were 287 sets of duplicate or overlapping p-ANI ranges found that affected multiple p-ANI ranges and 14 carriers in all. This was a result of multiple carriers reporting on the same p-ANI range or part of a p-ANI range either for the same selective router and same PSAP, same selective router but different PSAP, different selective router but same PSAP, or different selective router and different PSAP. The p-ANI ranges were eventually resolved when the carrier provided the correct NPA, provided the correct p-ANI range, returned the p-ANI range, or swapped it out for a new p-ANI range. At the end of 2013, only one overlapping p-ANI range remains to be resolved.

2.8.3.2 Government Shutdown Impact on p-ANI Administration

During the government shutdown from October 1 through October 16, no one had access to the Universal Licensing System database, which is critical to the verification process that the p-ANI Administrator uses prior to approving or denying applications for p-ANIs. As a result, we escalated the issue to the FCC for advice on how to proceed and were advised by the FCC to hold all applications until the shutdown was over. After hearing back from the FCC, we sent a notice to the RNAS users explaining how the p-ANI applications were going to be handled in the interim. During this period, 157 applications for new p-ANIs were suspended and no carrier notified us of any emergency situations that required an immediate need for p-ANIs. On October 17, all of the suspended applications were approved and assignments made, including the applications received on October 16.

2.8.3.3 Duplicate Assignment Issues

In 2013, we were notified that 38 p-ANI apparently available ranges that were assigned by the P-ANI Administrator were already in use by another carrier. We worked with the affected carriers to determine if the range was indeed in use or not. If the range was not in use, then it was removed by the old carrier from the applicable databases. If the range was in use, we replaced the assignment with a new range and showed it as assigned to the other carrier.

2.8.3.4 Customer Support

A carrier must demonstrate that its company is permitted under applicable law to access p-ANI resources in the area for which the p-ANI resources are sought by submitting an FCC license, a state certification, or copies of pages 2 and 36 of its FCC Form 477. If a carrier fails to provide one of these documents or the correct document

with its request for p-ANIs, we send a courtesy email requesting the documentation. We also work with the carriers to locate the appropriate documentation when they are having difficulties locating it to help minimize any delays in obtaining these critical resources. In 2013, we sent 154 courtesy emails and 24 documents to carriers.

2.8.4 2013 P-ANI Activity and Projected Exhaust Report

The ATIS Industry Numbering Committee developed the *P-ANI Administration Guidelines*, which contain the following language:

> "The RNA shall:
>
> ***a)*** prepare and publish a "p-ANI Activity and Projected Exhaust Report" that includes the following information:
>
> ***1.*** national p-ANI utilization information;
> ***2.*** p-ANI utilization by NPA;
> ***3.*** the number of p-ANIs requested on a monthly basis;
> ***4.*** the number of p-ANIs assigned on a monthly basis;
> ***5.*** the number of p-ANIs returned on a monthly basis;
> ***6.*** the number of p-ANIs modified on a monthly basis;
> ***7.*** the number of p-ANI requests processed and the disposition of each; and
> ***8.*** forecast reports for projected future p-ANI resource usage."

This report contains the required information for January 1 – December 31, 2013. Table 2-21 addresses national p-ANI utilization, p-ANI utilization by NPA, and forecast reports for projected future p-ANI resource usage.

The RNA posted this report to the website www.nationalpani.com, notified the INC and RNAS users that this information was available, and included it in the subsequent annual report required by the FCC contract.

Table 2-21
Projected Exhaust of 211/511 p-ANIs
(Based on data as of 12/31/2013)

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
201	NJ	8439	1197	2023	3
202	DC	538	12	3635	4
203	CT	9245	1030	2023	2
205	AL	2791	1028	2030	3
206	WA	507	0	N/A	N/A
207	ME	6122	173	2093	1
208	ID	2577	700	2038	4
209	CA	4831	1106	2027	3
210	TX	6853	635	2034	3
212	NY	4268	780	2033	1
213	CA	2503	460	2051	1
214	TX	5618	675	2034	2
215	PA	1273	42	2459	4
216	OH	1466	678	2040	2
217	IL	4742	1231	2025	2
218	MN	2623	443	2052	1
219	IN	4749	396	2052	3
224	IL	9610	944	2024	1
225	LA	485	325	2073	1
228	MS	1322	383	2062	4
229	GA	1622	449	2054	4
231	MI	4118	1780	2022	4
239	FL	385	322	2074	4
240	MD	410	34	2589	1
248	MI	6002	165	2098	4
251	AL	784	459	2055	4
252	NC	2246	648	2040	2
253	WA	612	65	2311	2
254	TX	5173	421	2048	1
256	AL	1542	598	2044	4
260	IN	1828	230	2092	1
262	WI	25	0	N/A	N/A
269	MI	1473	196	2108	3

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
270	KY	2089	603	2043	3
276	VA	1255	824	2036	3
281	TX	8975	820	2026	2
301	MD	1784	68	2281	4
302	DE	1670	259	2084	4
303	CO	2689	722	2037	4
304	WV	6525	465	2042	4
305	FL	343	224	2101	4
307	WY	1467	432	2056	4
308	NE	1246	584	2045	1
309	IL	4081	470	2047	4
310	CA	2566	448	2052	4
312	IL	3372	244	2081	1
313	MI	422	0	N/A	N/A
314	MO	8673	671	2030	4
315	NY	5736	5979	2015	2
316	KS	4427	691	2036	3
317	IN	5511	512	2041	2
318	LA	1787	554	2046	4
319	IA	1773	0	N/A	N/A
320	MN	1403	347	2067	3
321	FL	1005	260	2086	1
323	CA	3329	322	2065	4
325	TX	5644	465	2044	4
330	OH	5463	775	2032	4
334	AL	3074	830	2033	2
336	NC	1003	338	2069	1
337	LA	816	356	2067	4
340	VI	208	90	2233	4
352	FL	1142	502	2051	3
360	WA	2416	462	2051	1
361	TX	5181	483	2044	3
386	FL	1309	444	2055	1
401	RI	1241	12	3576	2
402	NE	4770	730	2034	4
404	GA	1247	220	2098	1
405	OK	10062	1072	2022	2

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
406	MT	1606	714	2039	4
407	FL	724	356	2067	1
408	CA	2398	378	2060	3
409	TX	2937	428	2053	4
410	MD	3055	178	2108	1
412	PA	1367	60	2324	3
413	MA	3532	514	2045	1
414	WI	6080	680	2033	2
415	CA	1690	84	2231	4
417	MO	2631	502	2048	3
419	OH	4872	669	2036	3
423	TN	2398	450	2052	1
425	WA	693	24	2817	2
430	TX	1030	223	2098	1
432	TX	2879	385	2057	2
434	VA	2267	972	2031	1
435	UT	700	299	2078	3
440	OH	1198	291	2078	3
443	MD	10	0	N/A	N/A
469	TX	3954	24	2682	3
470	GA	105	0	N/A	N/A
475	CT	1233	120	2169	2
478	GA	1016	340	2069	4
479	AR	2410	350	2063	2
480	AZ	20	0	N/A	N/A
484	PA	10	12	3679	4
501	AR	5089	796	2032	3
502	KY	629	322	2073	1
503	OR	1288	144	2143	4
504	LA	853	283	2081	3
505	NM	1925	353	2064	1
507	MN	2558	421	2054	2
508	MA	7017	1434	2022	1
509	WA	1802	210	2100	3
510	CA	2089	424	2055	1
512	TX	7110	709	2031	1
513	OH	2701	359	2061	1

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
515	IA	3820	1437	2024	2
516	NY	1034	702	2040	1
517	MI	410	162	2134	4
518	NY	5037	2250	2020	3
520	AZ	1316	492	2051	4
530	CA	7234	1660	2021	3
540	VA	4925	1294	2025	3
541	OR	3014	415	2054	4
559	CA	3568	484	2047	4
561	FL	1134	422	2058	3
562	CA	2582	394	2057	1
563	IA	1586	0	N/A	N/A
567	OH	80	0	N/A	N/A
570	PA	5474	596	2037	2
573	MO	1525	517	2049	3
574	IN	1670	316	2071	1
575	NM	1055	149	2140	1
580	OK	899	400	2061	4
585	NY	1416	693	2040	4
601	MS	2912	892	2032	1
602	AZ	1234	825	2036	3
603	NH	1198	72	2274	1
605	SD	1282	396	2060	2
606	KY	1440	651	2042	3
607	NY	2141	1629	2024	4
608	WI	2943	344	2063	3
609	NJ	10813	1358	2020	4
610	PA	2888	139	2136	1
612	MN	2770	36	2492	3
614	OH	1561	1038	2031	4
615	TN	2221	399	2058	3
616	MI	5478	1148	2026	3
617	MA	1033	132	2157	3
618	IL	11042	1922	2018	3
619	CA	2538	30	2595	1
620	KS	1986	265	2081	4
623	AZ	40	0	N/A	N/A

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
626	CA	2649	132	2144	2
630	IL	3850	814	2033	4
631	NY	1333	832	2035	2
636	MO	998	209	2104	4
641	IA	2179	0	N/A	N/A
650	CA	2960	519	2046	4
651	MN	776	30	2654	4
660	MO	668	405	2061	3
661	CA	1571	80	2243	2
662	MS	5189	1040	2027	1
678	GA	435	214	2104	2
682	TX	6280	191	2085	4
701	ND	914	390	2062	4
702	NV	435	205	2108	2
703	VA	1489	588	2044	2
704	NC	1117	327	2071	3
706	GA	2821	810	2034	1
707	CA	5419	773	2032	4
708	IL	9162	1918	2019	3
712	IA	1820	0	N/A	N/A
713	TX	2566	175	2113	3
714	CA	3990	490	2046	3
715	WI	2994	410	2054	2
716	NY	1679	1019	2031	4
717	PA	1655	335	2068	4
718	NY	4134	325	2062	4
719	CO	2781	580	2043	3
720	CO	404	250	2091	2
724	PA	1733	140	2143	2
727	FL	463	36	2556	3
731	TN	1990	371	2062	3
732	NJ	9034	1647	2020	3
734	MI	6710	844	2029	3
740	OH	4427	379	2054	1
754	FL	63	0	N/A	N/A
757	VA	3145	853	2033	4
760	CA	5123	940	2029	4

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
763	MN	792	24	2813	2
765	IN	9120	2228	2018	4
769	MS	1022	100	2203	4
770	GA	1573	492	2050	2
772	FL	264	365	2067	1
774	MA	108	192	2117	3
775	NV	1331	459	2054	3
781	MA	2467	690	2038	2
785	KS	4254	665	2037	3
786	FL	187	64	2323	3
787	PR	355	65	2315	1
801	UT	992	652	2042	1
802	VT	1640	152	2134	4
803	SC	2152	463	2052	3
804	VA	4173	1016	2029	3
805	CA	3824	500	2045	2
806	TX	7920	665	2031	1
808	HI	1544	282	2078	2
810	MI	375	132	2162	3
812	IN	5991	2096	2020	3
813	FL	611	272	2084	2
814	PA	2836	303	2070	3
815	IL	3969	725	2035	1
816	MO	2912	641	2040	3
817	TX	5014	618	2037	1
818	CA	903	30	2650	3
828	NC	2350	429	2054	1
830	TX	2360	187	2107	2
831	CA	2411	790	2035	2
832	TX	6019	462	2043	2
843	SC	2144	400	2058	3
845	NY	2537	1104	2029	4
847	IL	5822	1242	2024	2
850	FL	1338	422	2057	1
856	NJ	5078	1669	2022	4
858	CA	3189	862	2033	3
859	KY	1668	316	2071	1

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
860	CT	11112	393	2036	3
863	FL	668	324	2073	3
864	SC	1679	347	2066	4
865	TN	1225	245	2090	3
870	AR	4189	700	2036	3
901	TN	1807	209	2100	1
903	TX	9668	663	2029	3
904	FL	509	320	2074	4
906	MI	1384	338	2068	1
907	AK	1032	108	2189	3
908	NJ	10016	1458	2020	4
909	CA	3464	698	2037	3
910	NC	1597	453	2054	3
912	GA	1952	522	2048	3
913	KS	1389	257	2085	2
914	NY	1819	1104	2029	2
915	TX	682	12	3623	4
916	CA	2998	640	2040	3
918	OK	4833	590	2039	3
919	NC	1176	205	2105	4
920	WI	2984	387	2057	4
925	CA	2339	640	2041	3
928	AZ	966	440	2056	2
931	TN	1981	229	2092	3
936	TX	249	0	N/A	N/A
937	OH	3311	525	2045	4
940	TX	3467	385	2056	4
941	FL	538	336	2071	4
947	MI	2586	132	2145	4
949	CA	1345	24	2790	2
951	CA	2899	664	2039	4
952	MN	510	144	2148	2
954	FL	478	290	2080	2
956	TX	4211	507	2044	1
970	CO	1357	480	2052	4
972	TX	3877	415	2052	4
973	NJ	11131	1195	2020	2

NPA	STATE	Total p-ANIs	Forecasted p-ANIs	Exhaust Year	Exhaust Quarter
978	MA	3857	810	2033	4
979	TX	2767	223	2090	2
980	NC	40	0	N/A	N/A
985	LA	703	440	2057	4
989	MI	3356	314	2066	1

2.8.5 Routing Number Administration System (RNAS)

RNAS is the first national p-ANI database and is vitally important to our customers for obtaining E9-1-1 resources. Because RNAS stores all of the information relating to p-ANI administration and provides many essential reporting features that generally contain real-time data, reliability is essential.

In 2013 there were 3 instances of unscheduled down time totaling two hours and 39 minutes. Therefore, the RNAS availability in 2013 was 99.97%, which still exceeded the contract performance metric of 99.9% by 71%.

Neustar conducted maintenance on RNAS eight times using only 59 minutes and 39 seconds of approved scheduled downtime. As with PAS, we completed disaster recovery testing with RNAS during the weekend of October 18-20 with no down time. For more detailed information on the RNA performance, see Section 6.2.

2.9 Continued Focus on Outstanding 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 2013, we had a total of 171 of these customer focus items of which 116 were related to pooling and 55 were related to p-ANI activities.

A strong indication of our firm commitment to customer satisfaction is that we did not receive any formal complaints in 2013. Others include:

★ Processing 100% of Applications (Part 3s) 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. According to Section 5.0 of Clause C.1 of our requirements, we have met our contractual obligation as long as 99% of the applications are processed within the seven-day timeframe. In 2013 we processed a record number of Part 3s, 137,375, on time and usually well before the deadline.

★ Issuing Pooling Tips-of-the-Quarter

We continued to send the *Tip of the Quarter* to our PAS email distribution each quarter to help our customers understand pooling administration processes. In addition we recognized a need for additional information to be provided in the interim so we sent a supplemental Tip in May regarding disconnecting records in the BIRRDS database.

★ Issuing p-ANI Tips-of-the-Month

Building on the success of the Pooling *Tips*, the RNA began sending the *p-ANI Tip of the Month (p-ANI Tip)* in April of 2012. The *p-ANI Tip* provides helpful information regarding RNAS and the p-ANI request process, and serves as a useful reference for all RNAS users. It is sent via email to the RNAS distribution list on the first business day of each month

★ PAS and RNAS Exceptional Availability

Another area that shows our strong commitment to customer support relates to PAS and RNAS maintenance and builds. Although our contract permits us to make the systems unavailable to our customers during maintenance, 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 in any 12 month period. In 2013 we once again exceeded those requirements.

★ Exceeding Reporting Requirements for Responding to Requests for Ad Hoc Reports

The PA has specific timeframes for reporting, as detailed in Tables 2-16 and 2-17. Not only did we respond to a 25% increase in ad hoc reports requests on time in 2013, but we also responded to all requests for ad hoc reports within 24 hours of each request rather than taking the permitted three business days to respond.

★ Resolving p-ANI Range Discrepancies

We have continued to work with the stakeholders to resolve hundreds of conflicting data issues including double assignments and retrieval of unused p-ANIs that were activated but never used.

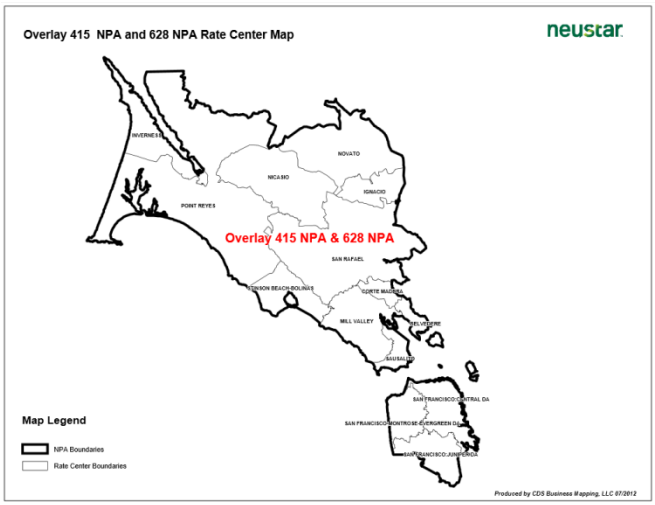
★ Training Videos

We not only proactively developed training videos which we first made available on our website on September 29, 2010 but we assisted NANPA with development of their own training video program. Details on training videos can be found in Table 2-11. In 2013 there were 330 training video views. This no-cost service makes it possible for every customer to access the training videos 24 hours a day, seven days a week.

Section 3
Identification of Existing and Potential Pooling Areas

In this section, Pooling Administration (PA) summarizes the number of existing pooling areas. As of December 31, 2013, there are 15,819 distinct pooling rate centers (i.e., pooling areas), which constitute 85.3% of the 18,538 total distinct rate centers. While we do not include a distinct list of separate "potential" pooling areas, there are currently 2,719 rate centers in which no carrier is pooling, and which could therefore be considered "potential" pooling areas. (See Section 3.2)

The PA designates each rate center 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 (PAS).

3.1 Identification of Existing Pooling Areas

Table 3-1 below identifies the 15,819 distinct pooling rate centers (*i.e.*, pooling areas), and their status designations, by state, as of December 31, 2013. A pooling rate center is defined as either "mandatory" or "optional." Rate centers with a designation of "excluded" are not considered pooling areas.

Table 3-1
Summary of Existing Pooling Areas by Status Designation

State	Mandatory (M)	Mandatory State (M)	Optional (O)	Mandatory Single SP (M*)	Mandatory State Single SP (M*)	Total
AK		64			196	260
AL	65	72	119	4	14	274
AR	37		173	10		220
AZ	27		43	20		90
CA	439	83	176	15		713
CO	22	5	134	4		165
CT	74	15				89
DC	1					1
DE	8		22			30
FL	132	14	124			270
GA	75		217	5		297
HI	1		5			6
IA	56	68	406	37		567
ID	14	70		5	56	145
IL	218		583	36		837
IN	213	250	11	12	32	518
KS	64		305	29		398

State	Mandatory (M)	Mandatory State (M)	Optional (O)	Mandatory Single SP (M*)	Mandatory State Single SP (M*)	Total
KY	45	131	136	2	32	346
LA	57		160	4		221
MA	234	30				264
MD	112	53				165
ME	50	101	85			236
MI	220	102	277	9	11	619
MN	56		269	8		333
MO	137	390		21	173	721
MS	38	87	84	6	16	231
MT			260			260
NC	143	21	232	8		404
ND			95			95
NE	28	143	170	4	106	451
NH	32	92	25			149
NJ	188		21			209
NM	12		61	3		76
NV	21		41	4		66
NY	406	246	79	1	15	747
OH	378	155	159	6	8	706
OK	96	15	161	44		316
OR	36	103	58			197
PA	415	340	12		9	776
PR	47		36	1		84
RI	25					25
SC	87		112	25		224
SD			99			99
TN	117		164	11		292
TX	288	7	596	38		929
UT	28		38	15	1	82
VA	121	182	66			369
VT		101	40			141
WA	54	150	1	3	20	228

State	Mandatory (M)	Mandatory State (M)	Optional (O)	Mandatory Single SP (M*)	Mandatory State Single SP (M*)	Total
WI	120	259	121	18	84	602
WV	7	156	59			222
WY			54			54
Grand Total	**5,044**	**3,505**	**6,089**	**408**	**773**	**15,819**

3.2 Summary by State of "Potential" Pooling Areas

The chart below breaks down by state the 2,719 rate centers that were designated as "excluded" from pooling as of December 31, 2013, and could be considered "potential" pooling areas. These rate centers 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 centers designated as "mandatory" or "optional." The 20 states with no excluded rate centers are identified in Section 3.3.2.

Table 3-2
Summary of Excluded Rate Centers by State

State	Excluded	State	Excluded	State	Excluded
AK	0	LA	56	OK	213
AL	36	MA	2	OR	58
AR	160	MD	0	PA	0
AZ	39	ME	13	PR	0
CA	26	MI	15	RI	0
CO	46	MN	306	SC	16
CT	0	MO	0	SD	169
DC	0	MS	8	TN	49
DE	0	MT	0	TX	348
FL	11	NC	28	UT	50
GA	63	ND	205	VA	0
HI	0	NE	0	VT	0
IA	250	NH	0	WA	0
ID	0	NJ	0	WI	0
IL	149	NM	87	WV	6
IN	7	NV	30	WY	38
KS	176	NY	0	Grand Total	2,719
KY	26	OH	33		

3.3 Summarized Information about Existing and "Potential" Pooling Areas

3.3.1 Pooling Rate Center Facts:

Total Number of Distinct Rate Centers	18,538
Total Number of Distinct Rate Centers Available for Pooling	15,819
Percentage of Distinct Rate Centers Available for Pooling	85.30%
Total Number of Mandatory Distinct Rate Centers	8,549
Percentage of Distinct Rate Centers that are Mandatory	46.10%
Total Number of Distinct Mandatory Single-Service Provider Rate Centers	1,181
Percentage of Distinct Rate Centers that are Mandatory Single-Service Provider	6.40%
Total Number of Distinct Optional Rate Centers	6,089
Percentage of Distinct Rate Centers that are Optional	32.80%
Total Number of Distinct Rate Centers Excluded from Pooling	2,719
Percentage of Distinct Rate Centers that are Excluded from Pooling	14.70%
Total Number of Rate Center Designations Changed in 2013 (see Section 2.4.2.1 for detail)	963
Total Number of Rate Centers with MSA name changes(see Section 2.7.2 for detail)	36

3.3.2 Summary of State/Jurisdiction Pooling Status

States or jurisdictions where number pooling has been implemented.	All states, the District of Columbia and Puerto Rico
States or jurisdictions that have only mandatory pooling rate centers.	Alaska, Connecticut, District of Columbia, Idaho, Maryland, Massachusetts, Missouri, and Rhode Island
States that have no mandatory pooling rate centers.	Montana[3], North Dakota, South Dakota, and Wyoming
States or jurisdictions that have no excluded rate centers.	Alaska, Connecticut, Delaware, District of Columbia, Hawaii, Idaho, Maryland, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New York, Pennsylvania, Puerto Rico, Rhode Island, Vermont, Virginia, Washington, and Wisconsin
States or jurisdictions that implemented additional mandatory pooling prior to December 31, 2013, 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.	Alabama, Alaska, Arizona, California, Colorado, Connecticut, Florida, Idaho, Illinois, Iowa, Indiana, Kentucky, Massachusetts, Maryland, Maine, Michigan, Missouri, Mississippi, North Carolina, Nebraska, New Hampshire, New Jersey, New York, Ohio, Oklahoma, Oregon, Pennsylvania, Tennessee, Texas, Utah, Virginia, Vermont, Washington, West Virginia, and Wisconsin

3.3.3. Complete Summary of all Rate Centers 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 18,538 rate centers in each state by their respective pooling status designations (mandatory, optional, or excluded) as of December 31, 2013.

[3] Mandatory pooling to be implemented in January, 2014.

neustar

Table 3-3
Summary of all Rate Centers by Status Designation

State	Mandatory (M)	Mandatory State (M)	Optional (O)	Mandatory Single SP (M*)	Mandatory State Single SP (M*)	Excluded (X)	Total
AK		64			196		**260**
AL	65	72	119	4	14	36	**310**
AR	37		173	10		160	**380**
AZ	27		43	20		39	**129**
CA	439	83	176	15		26	**739**
CO	22	5	134	4		46	**211**
CT	74	15					**89**
DC	1						**1**
DE	8		22				**30**
FL	132	14	124			11	**281**
GA	75		217	5		63	**360**
HI	1		5				**6**
IA	56	68	406	37		250	**817**
ID	14	70		5	56		**145**
IL	218		583	36		149	**986**
IN	213	250	11	12	32	7	**525**
KS	64		305	29		176	**574**
KY	45	131	136	2	32	26	**372**
LA	57		160	4		56	**277**
MA	234	30				2	**266**
MD	112	53					**165**
ME	50	101	85			13	**249**
MI	220	102	277	9	11	15	**634**
MN	56		269	8		306	**639**
MO	137	390		21	173		**721**
MS	38	87	84	6	16	8	**239**
MT			260				**260**
NC	143	21	232	8		28	**432**
ND			95			205	**300**
NE	28	143	170	4	106		**451**
NH	32	92	25				**149**

State	Mandatory (M)	Mandatory State (M)	Optional (O)	Mandatory Single SP (M*)	Mandatory State Single SP (M*)	Excluded (X)	Total
NJ	188		21				**209**
NM	12		61	3		87	**163**
NV	21		41	4		30	**96**
NY	406	246	79	1	15		**747**
OH	378	155	159	6	8	33	**739**
OK	96	15	161	44		213	**529**
OR	36	103	58			58	**255**
PA	415	340	12		9		**776**
PR	47		36	1			**84**
RI	25						**25**
SC	87		112	25		16	**240**
SD			99			169	**268**
TN	117		164	11		49	**341**
TX	288	7	596	38		348	**1,277**
UT	28		38	15	1	50	**132**
VA	121	182	66				**369**
VT		101	40				**141**
WA	54	150	1	3	20		**228**
WI	120	259	121	18	84		**602**
WV	7	156	59			6	**228**
WY			54			38	**92**
Grand Total	**5,044**	**3,505**	**6,089**	**408**	**773**	**2,719**	**18,538**

neustar

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 2013. There are 2,570 distinct service providers participating in 15,819 distinct pooled rate centers in 242 NPA and NPA complexes covering 52 jurisdictions -- 50 states, the District of Columbia, and Puerto Rico.

Table 4-1
Aggregated Total by Pool of the Service Providers Participating in the Pooled Areas

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
201/551	50	22
202	39	1
203/475	32	32
205	39	66
206	43	5
207	53	236
208	52	145
209	35	55
210	35	1
212/646/917	53	1
213	49	3
214/469/972	66	43
215/267	46	36
216	34	4
217	35	220
218	39	84
219	32	45
224/847	37	42
225	34	34
228	26	11
229	32	70
231	34	86
234/330	45	116
239	28	14

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
240/301	65	63
248/947	41	20
251	37	42
252	33	89
253	38	10
254	43	77
256/938	43	91
260	30	76
262	31	60
269	40	76
270	52	170
272/570	53	180
276	39	78
281/713/832	60	45
302	33	30
303/720	45	16
304/681	37	222
305	32	1
305/786	46	4
307	22	54
308	27	170
309	34	125
310/424	44	16
312/872	40	1

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
313	35	6
314	29	7
315	42	149
316	26	14
317	38	36
318	26	78
319	31	92
320	41	87
321	31	5
321/407	44	17
323	42	12
325	30	55
331/630	38	25
334	44	75
336	54	82
337	35	60
339/781	32	40
347/718/917/929	46	11
347/718/929	36	2
351/978	37	58
352	32	48
360	60	76
361	34	63
385/801	26	20
386	38	28
401	22	25
402/531	55	281
404/470/678	50	1
405	34	82
406	34	260
408/669	45	11
409	41	40
410/443/667	49	102
412/878	34	23
413	29	61
414	27	4
415	46	14
417	42	155

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
419/567	48	173
423	48	70
425	40	14
430/903	54	146
432	22	36
434	30	66
435	33	62
440	43	62
442/760	55	83
458/541	51	136
470/678/770	55	41
478	41	36
479	24	46
480	33	1
484/610	55	90
501	28	53
502	35	35
503/971	53	61
504	31	5
505	32	29
507	39	136
508/774	38	85
509	50	123
510	38	13
512/737	51	35
513	35	25
515	42	78
516	44	11
517	49	76
518	43	135
520	32	27
530	48	115
534/715	68	253
539/918	42	120
540	51	117
559	35	57
561	43	7
562	43	9

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
563	29	78
571/703	50	19
573	34	216
574	37	52
575	31	47
580	35	114
585	36	77
586	37	11
601/769	43	98
602	28	1
603	39	149
605	23	99
606	32	99
607	33	105
608	51	159
609	39	39
612	38	1
614	39	16
615	38	49
616	39	36
617/857	37	20
618	41	202
619	43	11
620	49	174
623	30	1
626	44	10
631	43	53
636	29	46
641	38	153
650	38	15
651	44	11
657/714	43	13
660	30	224
661	48	32
662	46	122
682/817	55	24
701	37	95
702	32	16

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
704/980	43	56
706/762	73	100
707	43	75
708	35	32
712	42	166
716	38	79
717	43	107
719	35	55
724/878	48	162
727	38	5
731	32	58
732/848	40	36
734	48	33
740	50	187
747/818	42	16
754/954	44	5
757	26	34
763	49	11
765	48	138
772	37	8
773/872	36	10
775	32	50
779/815	50	180
785	41	176
787/939	12	84
802	23	141
803	52	78
804	29	55
805	52	40
806	32	82
808	17	6
810	37	47
812	56	171
813	43	8
814	44	178
816	40	73
828	36	69
830	46	79

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
831	34	24
843	44	85
845	58	96
850	37	67
856	41	32
858	37	8
859	40	42
860	29	57
862/973	51	42
863	40	23
864	40	61
865	32	33
870	27	121
901	30	14
904	34	19
906	20	93
907	21	260
908	43	38
909	48	21
910	39	70
912	43	49
913	35	34

NPA/NPA COMPLEX	Pooling OCNs	Pooled RCs
914	46	28
915	30	7
916	43	16
919/984	42	38
920	55	126
925	36	17
928	33	60
931	41	68
936	41	46
937	44	123
940	50	70
941	39	11
949	42	7
951	43	20
952	43	3
956	36	30
970	38	94
979	44	50
985	34	44
989	41	135

Section 5
Forecast Results and a Review of Forecasts versus Actual Block Activation in 2013

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

In summary for 2013, when comparing the number of blocks forecasted against the number of blocks assigned, 38% of the blocks forecasted were assigned, which is the third highest percentage since we began pooling.

The relevant numbers are:

- 242 NPA complexes;
- 10,668 distinct rate areas with forecasts;
- 124,093 forecasted blocks; and
- 47,193 blocks assigned.

5.1 Forecasted versus Actual Block Assignments by NPA or NPA complex for 2013

The table below shows that 124,093 blocks were forecasted and 47,193 blocks were assigned in 242 NPA and NPA complexes during the 2013 calendar year. This resulted in 38% of the forecasted blocks being assigned. The lowest percentage was 21.3% in 2004.

Carriers forecasted a need for blocks in 10,668 pooling rate centers out of the 15,819 pooling rate centers, or in 67% of them. In 5,151 pooling rate centers, no blocks were forecasted during 2013. When compared with 2012, the number of blocks assigned increased slightly by less than 1% while the number of blocks forecasted increased almost 10%. The Mississippi 662 NPA had the lowest percentage of blocks assigned compared to total forecast, at 12.5%, while the New York 607 NPA had the highest ratio at 72.5%.

neustar

Table 5-1

Forecasted versus Actual Block Assignments by NPA or NPA complex for 2013

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
201/551	NJ	582	219	37.6%
202	DC	377	212	56.2%
203/475	CT	416	232	55.8%
205	AL	344	146	42.4%
206	WA	394	125	31.7%
207	ME	546	264	48.4%
208	ID	353	116	32.9%
209	CA	493	215	43.6%
210	TX	649	331	51.0%
212/646/917	NY	760	316	41.6%
213	CA	412	141	34.2%
214/469/972	TX	1,868	740	39.6%
215/267	PA	1,160	425	36.6%
216	OH	265	146	55.1%
217	IL	398	106	26.6%
218	MN	262	84	32.1%
219	IN	476	186	39.1%
224/847	IL	1,293	499	38.6%
225	LA	144	60	41.7%
228	MS	135	21	15.6%
229	GA	212	72	34.0%
231	MI	270	103	38.1%
234/330	OH	2,249	567	25.2%
239	FL	257	87	33.9%
240/301	MD	715	362	50.6%
248/947	MI	613	278	45.4%
251	AL	128	46	35.9%
252	NC	536	205	38.2%
253	WA	262	67	25.6%
254	TX	338	101	29.9%
256/938	AL	406	196	48.3%
260	IN	211	107	50.7%
262	WI	1,258	181	14.4%
269	MI	314	96	30.6%
270/364	KY	485	117	24.1%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
272/570	PA	575	193	33.6%
276	VA	249	88	35.3%
281/346/713/832	TX	2,326	1174	50.5%
302	DE	387	193	49.9%
303/720	CO	782	367	46.9%
304/681	WV	710	299	42.1%
305	FL	203	76	37.4%
305/786	FL	756	359	47.5%
307	WY	160	87	54.4%
308	NE	654	302	46.2%
309	IL	275	64	23.3%
310/424	CA	979	315	32.2%
312/872	IL	549	219	39.9%
313	MI	706	257	36.4%
314	MO	653	296	45.3%
315	NY	237	168	70.9%
316	KS	766	500	65.3%
317	IN	534	300	56.2%
318	LA	374	93	24.9%
319	IA	224	73	32.6%
320	MN	368	79	21.5%
321	FL	197	59	29.9%
321/407	FL	724	298	41.2%
323	CA	550	211	38.4%
325	TX	112	49	43.8%
331/630	IL	583	236	40.5%
334	AL	321	167	52.0%
336	NC	462	175	37.9%
337	LA	174	84	48.3%
339/781	MA	625	319	51.0%
347/718/917/929	NY	1,948	754	38.7%
347/718/929	NY	234	73	31.2%
351/978	MA	666	315	47.3%
352	FL	678	167	24.6%
360	WA	571	163	28.5%
361	TX	206	100	48.5%
385/801	UT	586	288	49.1%
386	FL	350	102	29.1%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
401	RI	126	78	61.9%
402/531	NE	518	157	30.3%
404/470/678	GA	731	369	50.5%
405	OK	599	258	43.1%
406	MT	230	98	42.6%
408/669	CA	693	265	38.2%
409	TX	233	116	49.8%
410/443/667	MD	774	400	51.7%
412/878	PA	695	200	28.8%
413	MA	294	111	37.8%
414	WI	442	95	21.5%
415	CA	587	275	46.8%
417	MO	456	157	34.4%
419/567	OH	1,397	521	37.3%
423	TN	459	115	25.1%
425	WA	280	100	35.7%
430/903	TX	904	308	34.1%
432	TX	175	98	56.0%
434	VA	221	116	52.5%
435	UT	167	76	45.5%
440	OH	1,084	587	54.2%
442/760	CA	1,240	433	34.9%
458/541	OR	799	238	29.8%
470/678/770	GA	1,680	445	26.5%
478	GA	214	69	32.2%
479	AR	198	70	35.4%
480	AZ	660	241	36.5%
484/610	PA	1,178	433	36.8%
501	AR	234	67	28.6%
502	KY	381	203	53.3%
503/971	OR	768	327	42.6%
504	LA	268	122	45.5%
505	NM	304	160	52.6%
507	MN	298	75	25.2%
508/774	MA	1,043	514	49.3%
509	WA	386	137	35.5%
510	CA	536	200	37.3%
512/737	TX	791	349	44.1%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
513	OH	465	227	48.8%
515	IA	298	100	33.6%
516	NY	619	132	21.3%
517	MI	418	162	38.8%
518	NY	247	166	67.2%
520	AZ	422	164	38.9%
530	CA	613	271	44.2%
534/715	WI	452	88	19.5%
539/918	OK	600	205	34.2%
540	VA	376	169	44.9%
559	CA	559	258	46.2%
561	FL	359	181	50.4%
562	CA	320	105	32.8%
563	IA	171	56	32.7%
571/703	VA	568	310	54.6%
573	MO	830	406	48.9%
574	IN	203	83	40.9%
575	NM	228	116	50.9%
580	OK	263	77	29.3%
585	NY	296	136	45.9%
586	MI	629	297	47.2%
601/769	MS	480	94	19.6%
602	AZ	392	120	30.6%
603	NH	410	175	42.7%
605	SD	245	115	46.9%
606	KY	252	105	41.7%
607	NY	204	148	72.5%
608	WI	316	103	32.6%
609	NJ	793	239	30.1%
612	MN	290	105	36.2%
614	OH	1,135	435	38.3%
615	TN	423	166	39.2%
616	MI	379	175	46.2%
617/857	MA	697	327	46.9%
618	IL	504	167	33.1%
619	CA	419	207	49.4%
620	KS	487	147	30.2%
623	AZ	287	59	20.6%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
626	CA	362	141	39.0%
631	NY	863	259	30.0%
636	MO	390	177	45.4%
641	IA	203	37	18.2%
650	CA	585	217	37.1%
651	MN	331	86	26.0%
657/714	CA	604	238	39.4%
660	MO	400	111	27.8%
661	CA	593	191	32.2%
662	MS	672	84	12.5%
682/817	TX	738	293	39.7%
701	ND	235	92	39.1%
702/725	NV	597	273	45.7%
704/980	NC	633	353	55.8%
706/762	GA	957	213	22.3%
707	CA	1,413	262	18.5%
708	IL	589	226	38.4%
712	IA	260	91	35.0%
716	NY	541	152	28.1%
717	PA	614	229	37.3%
719	CO	266	107	40.2%
724/878	PA	1,297	342	26.4%
727	FL	484	108	22.3%
731	TN	232	45	19.4%
732/848	NJ	706	250	35.4%
734	MI	709	318	44.9%
740	OH	1042	350	33.6%
747/818	CA	599	235	39.2%
754/954	FL	424	222	52.4%
757	VA	142	93	65.5%
763	MN	343	108	31.5%
765	IN	458	183	40.0%
772	FL	205	59	28.8%
773/872	IL	1,126	316	28.1%
775	NV	155	105	67.7%
779/815	IL	725	225	31.0%
785	KS	476	142	29.8%
787/939	PR	451	201	44.6%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
802	VT	345	76	22.0%
803	SC	575	229	39.8%
804	VA	289	134	46.4%
805	CA	796	251	31.5%
806	TX	202	82	40.6%
808	HI	362	148	40.9%
810	MI	381	139	36.5%
812	IN	487	252	51.7%
813	FL	390	170	43.6%
814	PA	557	155	27.8%
816	MO	764	301	39.4%
828	NC	331	139	42.0%
830	TX	283	124	43.8%
831	CA	162	52	32.1%
843	SC	443	170	38.4%
845	NY	628	183	29.1%
850	FL	398	117	29.4%
856	NJ	665	188	28.3%
858	CA	360	148	41.1%
859	KY	235	94	40.0%
860	CT	431	227	52.7%
862/973	NJ	718	274	38.2%
863	FL	399	119	29.8%
864	SC	402	179	44.5%
865	TN	237	91	38.4%
870	AR	314	71	22.6%
901	TN	270	127	47.0%
904	FL	392	194	49.5%
906	MI	233	119	51.1%
907	AK	97	58	59.8%
908	NJ	546	131	24.0%
909	CA	632	236	37.3%
910	NC	296	89	30.1%
912	GA	272	86	31.6%
913	KS	495	285	57.6%
914	NY	464	138	29.7%
915	TX	189	120	63.5%
916	CA	407	193	47.4%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
919/984	NC	514	252	49.0%
920	WI	455	110	24.2%
925	CA	566	164	29.0%
928	AZ	546	186	34.1%
931	TN	334	90	26.9%
936	TX	252	117	46.4%
937	OH	761	300	39.4%
940	TX	219	74	33.8%
941	FL	400	86	21.5%
949	CA	414	183	44.2%
951	CA	668	236	35.3%
952	MN	238	52	21.8%
956	TX	408	217	53.2%
970	CO	851	248	29.1%
979	TX	276	147	53.3%
985	LA	143	67	46.9%
989	MI	454	231	50.9%
Totals		124,093	47,193	38.0%

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

Table 5-2 below shows that there were 24 NPA/NPA complex areas where fewer than 25% of the blocks forecasted were assigned in 2013. This is similar to the 22 NPA/NPA complex areas where fewer than 25% of the blocks forecasted were assigned in 2012.

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

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
662	MS	672	84	12.5%
262	WI	1258	181	14.4%
228	MS	135	21	15.6%
641	IA	203	37	18.2%
707	CA	1413	262	18.5%
731	TN	232	45	19.4%
534/715	WI	452	88	19.5%
601/769	MS	480	94	19.6%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
623	AZ	287	59	20.6%
516	NY	619	132	21.3%
320	MN	368	79	21.5%
414	WI	442	95	21.5%
941	FL	400	86	21.5%
952	MN	238	52	21.8%
802	VT	345	76	22.0%
706/762	GA	957	213	22.3%
727	FL	484	108	22.3%
870	AR	314	71	22.6%
309	IL	275	64	23.3%
908	NJ	546	131	24.0%
270/364	KY	485	117	24.1%
920	WI	455	110	24.2%
352	FL	678	167	24.6%
318	LA	374	93	24.9%

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

Table 5-3 below shows that there were 39 NPA/NPA complex areas where the ratio between blocks forecasted and blocks assigned was above 50% in 2013. Compared to prior years, 2013 has a substantial reduction in the number of NPA/NPA complex areas where the ratio between blocks forecasted and blocks assigned was above 50%. In addition, none of those areas had a percent assigned over 75%, which has not happened since 2008.

Table 5-3
NPA/States with forecasted versus actual blocks assigned above 50%
(Sorted from highest to lowest)

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
607	NY	204	148	72.50%
315	NY	237	168	70.90%
775	NV	155	105	67.70%
518	NY	247	166	67.20%
757	VA	142	93	65.50%

NPA/NPA Complex	State	Blocks Forecasted	Blocks Assigned	Percent Assigned
316	KS	766	500	65.30%
915	TX	189	120	63.50%
401	RI	126	78	61.90%
907	AK	97	58	59.80%
913	KS	495	285	57.60%
317	IN	534	300	56.20%
202	DC	377	212	56.20%
432	TX	175	98	56.00%
704/980	NC	633	353	55.80%
203/475	CT	416	232	55.80%
216	OH	265	146	55.10%
571/703	VA	568	310	54.60%
307	WY	160	87	54.40%
440	OH	1,084	587	54.20%
979	TX	276	147	53.30%
502	KY	381	203	53.30%
956	TX	408	217	53.20%
860	CT	431	227	52.70%
505	NM	304	160	52.60%
434	VA	221	116	52.50%
754/954	FL	424	222	52.40%
334	AL	321	167	52.00%
410/443/667	MD	774	400	51.70%
812	IN	487	252	51.70%
906	MI	233	119	51.10%
210	TX	649	331	51.00%
339/781	MA	625	319	51.00%
575	NM	228	116	50.90%
989	MI	454	231	50.90%
260	IN	211	107	50.70%
240/301	MD	715	362	50.60%
281/346/713/832	TX	2,326	1174	50.50%
404/470/678	GA	731	369	50.50%
561	FL	359	181	50.40%

5.4. Analysis of Forecasted-versus-Actual-Blocks Assigned Percentage since 2009

For the five years since 2009, the forecasted-versus-actual-blocks-assigned percentage in 2013 ranks lowest. The volume of assigned blocks is the third highest since we began pooling and forecasted blocks are the second highest as compared with the other reported years, but the ratio of assigned blocks to forecasted blocks has decreased to 38% compared to the highest percentage of 57.5% in 2011.

The following chart illustrates the ratio between forecasts and actual assigned blocks from 2009 through 2013 ranked from highest percentage to lowest.

Table 5-4
Summary of Forecasts and Actual Assigned Blocks from 2009 through 2013

Rank from Highest to Lowest	Year	Total Forecasted Blocks	Total Blocks Assigned	Percentage of Assigned/ Forecasted Blocks
1	2011	90,421	51,978	57.5%
2	2010	95,387	46,360	48.6%
3	2012	113,077	47,014	41.6%
4	2009	88,920	34,364	38.6%
5	2013	124,093	47,193	38%

Section 6
Pooling Administration (PA) and Routing Number Administration (RNA) Systems Performance

> I appreciate the efforts the Pooling Administration makes in improving their site and in meeting its customer needs by the enhancement and tools offered, which make our jobs easier as well.
>
> 2013 PA Survey Comment

6.1. Pooling Administration System (PAS) Performance in 2013

6.1.1 Summary of PAS Performance in 2013

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

Section 3.3 of Attachment A, Thousands-Block Pooling Administrator *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 2013, we continued to significantly exceed the PAS performance metric of 99.9% scheduled uptime. PAS was available for use **99.98%** of scheduled uptime. Because PAS is available 24 hours a day, seven days a week, there were a possible 8,760 hours that PAS could be available in 2013. The only *unscheduled* down time for the year totaled 1 hour and 45 minutes which exceeded the performance metric by 80.5%. PAS has exceeded the performance metric every year of each FCC contract.

PAS became unavailable for one hour and 12 minutes without prior notice on January 25 and for 33 minutes on January 26. To our knowledge no customers were affected by this outage.

There were no instances of scheduled PAS unavailability in 2013.

Table 6-1 summarizes PAS system performance in 2013.

Table 6-1
Summary of Actual PAS Performance in 2013

MONTH	NUMBER OF POSSIBLE AVAILABLE HOURS	NUMBER OF HOURS AVAILABLE	TOTAL UNAVAILABILITY	SCHEDULED (S) OR UNSCHEDULED (U)	PERCENT ACTUAL HOURS AVAILABLE
January	744	742 hrs. 15 min.	1 hr. 45 min.	U	99.76%
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%
September	720	720			100%
October	744	744			100%
November	720	720			100%
December	744	744			100%

6.1.2 PAS Performance Metrics

In 2013, as outlined in Table 6-2, PAS consistently exceeded the required performance metrics as set forth in Attachment A 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%	SIGNIFICANTLY EXCEEDED THE REQUIREMENT WITH A SCHEDULED AVAILABILITY LEVEL OF 99.98%
Maintenance (See PWS 3.3)	Unscheduled maintenance of the PAS is less than 9 hours in any 12 month period	100%	MET THE REQUIREMENT WITH TWO INSTANCES OF UNSCHEDULED DOWNTIME RESULTING IN THE UNAVAILABILITY OF PAS IN 2013 FOR ONLY ONE HOUR AND 45 MINUTES.
Maintenance (See PWS 3.3)	Scheduled maintenance of the PAS is less than 24 hours in any 12 month period	100%	MET THE REQUIREMENT WITH ZERO TOTAL APPROVED DOWNTIME RELATED TO SCHEDULED MAINTENANCE DURING 2013

6.1.3 PAS Updates in 2013

We had a total of four maintenance updates and builds in 2013. Although we requested and were approved for 10 hours of scheduled downtime outside of normal business hours for these activities, our customers experienced no interruption of service during these times. There were two builds related to change orders and two for system maintenance. Change Order 23 was implemented on April 5 and part of Change Order 24 was implemented in the PAS on July 19. The remaining two were routine maintenance activities.

Table 6-3
PAS Update Descriptions

DATE	CHANGE ORDER/S	ACTIVITY TYPE	TIME APPROVED/USED
February 25		Maintenance	Approved for 4 hours; Used ZERO
March 25		Maintenance	Approved for 4 hours; Used ZERO
April 5	Change Order 23	Build	None requested.
July 19	Change Order 24 (Part)	Build	Approved for 2 hours; Used ZERO

In our continuing focus on customer service we provided detailed email notifications about upcoming PAS builds two weeks prior to the builds to give our customers ample notice of the upcoming changes in PAS. This notice is in addition to the customary email notification that is sent the day of the build, and it allows customers more time to prepare for PAS updates. We provide this additional notice in response to a comment on a past annual NANC performance survey.

6.1.4 Implementation of Change Orders in 2013

Two change orders were implemented in 2013. Table 6-4 shows descriptions of the changes that were incorporated into PAS and Table 6-5 shows the status of the remaining part of Change Order 24:

Table 6-4
Change Orders Implemented in 2013

Number	Description of Changes	Implemented
23	PAS provides a new ***"Over-Contaminated Block Exception" radio button*** on the Months-to-Exhaust form for SP/SPC users that can be selected when submitting a request to retrieve an over-contaminated block where the MTE and/or Utilization requirements are not met. In cases where a user is submitting a request to retrieve an over-contaminated block, the new ***"Over-Contaminated Block***	April 5, 2013

	Exception" radio button can now be selected instead of selecting ***"State Waiver Request"*** (as was done in the past) in order to override the validations for MTE and utilization. The new radio button allows users to correctly indicate that the request is for an "over-contaminated block exception".	
24	This build included enhancements to the FTP Process: • FTP Enhancement for State Waiver Request • FTP Enhancement for Create Part 4 for Dedicated Customer Request • FTP Enhancement for Cancel Block Disconnect • FTP Enhancement for Code Disconnect	July 19, 2013

Table 6-5 provides a status of the change orders as of December 31, 2013.

Number	Description	Status
24	Enhancement of the FTP Interface with the Pooling Administration System	On July 19, 2013 partial implementation of Change Order 24 was completed. The remainder of the enhancements will be completed in conjunction with the implementation of the new PAS.

6.2. Routing Number Administration System (RNAS) Performance in 2013

6.2.1 Summary of RNAS Performance in 2013

As with PAS, the Routing Number Administration System (RNAS) is the nucleus of the routing number administration (p-ANI) operation and is vitally important to our customers for obtaining E9-1-1 resources. Because RNAS stores all of the information relating to p-ANI administration and provides many essential reporting features that

generally contain real-time data, reliability is equally essential. RNAS is subject to the same availability requirements as PAS.

2013 was the first full year of operation for RNAS. In 2013, RNAS significantly exceeded the performance metric of 99.9% scheduled uptime. RNAS was available for use **99.97%** of scheduled uptime. Because RNAS is available 24 hours a day, seven days a week, there were a possible 8,760 hours that RNAS could be available in 2013. The only *unscheduled* down time for the year totaled 2 hours and 39 minutes and no customers were affected which exceeds the performance metric by 71%.

RNAS became unavailable for one hour and 12 minutes without prior notice on January 25 and for 53 minutes on January 26. To our knowledge no customers were affected by these outages. In addition, RNAS experienced 34 minutes and 31 seconds of unscheduled downtime on May 30.

In addition to the unscheduled downtime, there was one instance of scheduled maintenance for RNAS in 2013. We requested 4 hours of scheduled maintenance for March 25 and used a total of 59 minutes 31 seconds of that requested time.

Following is a summary of RNAS performance in 2013:

Table 6-6
Summary of RNAS Performance in 2013

MONTH	NUMBER OF POSSIBLE AVAILABLE HOURS	NUMBER OF HOURS AVAILABLE	TOTAL UNAVAILABILITY	SCHEDULED (S) OR UNSCHEDULED (U)	PERCENT SCHEDULED HOURS AVAILABLE
January	744	741 hrs. 55 min.	2 hrs. 5 min.	U	99.72%
February	672	672			100%
March	744	743 hrs. 21 sec.	59 min. 39 sec.	S	100%
April	720	720			100%
May	744	743 hrs. 25 min. 29 sec.	34 min. 31 sec.	U	99.92%
June	720	720			100%
July	744	744			100%
August	744	744			100%
September	720	720			100%
October	744	744			100%

MONTH	NUMBER OF POSSIBLE AVAILABLE HOURS	NUMBER OF HOURS AVAILABLE	TOTAL UNAVAILABILITY	SCHEDULED (S) OR UNSCHEDULED (U)	PERCENT SCHEDULED HOURS AVAILABLE
November	720	720			100%
December	744	744			100%

6.2.2 RNAS Performance Metrics

In 2013, as outlined in Table 6-7, RNAS consistently exceeded the required performance metrics as set forth in Section 3.3 of Attachment A of the contract for PA systems:

Table 6-7
RNAS Performance Metrics

REQUIRED SERVICE	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL	ACCOMPLISHMENT
RNAS Availability (See PWS 3.3)	Routing Number Administration System is available	99.9%	SIGNIFICANTLY EXCEEDED THE REQUIREMENT WITH A SCHEDULED AVAILABILITY LEVEL OF 99.97%
Maintenance (See PWS 3.3)	Unscheduled maintenance of the RNAS is less than 9 hours in any 12 month period	100%	MET THE REQUIREMENT WITH THREE INSTANCES OF UNSCHEDULED DOWNTIME RESULTING IN THE UNAVAILABILITY OF RNAS IN 2013 TOTALING TWO HOURS 39 MINUTES.
Maintenance (See PWS 3.3)	Scheduled maintenance of the RNAS is less than 24 hours in any 12 month period	100%	MET THE REQUIREMENT BY USING ONLY 59 MINUTES 39 SECONDS OF APPROVED DOWNTIME AS A RESULT OF SCHEDULED MAINTENANCE DURING 2013

6.2.3 RNAS Maintenance in 2013

There were eight maintenance instances for RNAS in 2013, all performed outside of normal working hours. During maintenance on March 25, we experienced 59 minutes 39 seconds of approved down time.

Table 6-8
RNAS Maintenance in 2013

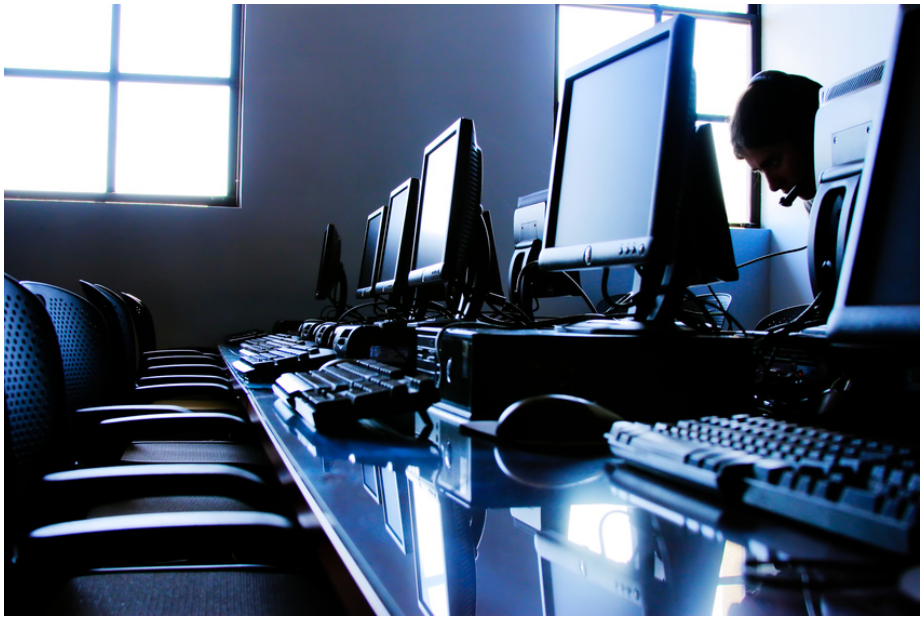
DATE	ACTIVITY TYPE	TIME APPROVED/USED
February 25	**Maintenance**	**Approved for 4 hours; Used ZERO**
March 25	**Maintenance**	**Approved for 4 hours; Used 59 min. 39 sec.**
May 2	**Maintenance**	**Approved for 4 hours; Used ZERO**
May 30	**Maintenance**	**None requested but had 34 min. 31 sec. unscheduled downtime**
August 20	**Maintenance**	**None requested**
November 12	**Maintenance**	**None requested**
November 15	**Maintenance**	**None requested**
December 4	**Maintenance**	**None requested**

6.3. PA and RNA Systems Disaster Recovery Testing

The PA successfully completed technical disaster recovery testing for both PAS and RNAS from October 18 through October 20 with no downtime for either system. Testing included switching PAS and RNAS to the backup site in Charlotte and returning them to the primary location in Sterling as well as other tests designed to ensure Neustar's ability to reestablish the PAS and RNAS operating systems and applications in the event of a catastrophic failure. The system testing followed office process testing conducted in the Concord office to assure participation in evacuation procedures and the ability of personnel to access the system from off site.

Section 7
Status of Required Transferable Property

Neustar Pooling Administration Services affirms that all equipment defined in the annual inventory report required per Section 3.21 of the contract is considered transferable property, and is available for transfer upon direction from the FCC. The transferable property inventory report is appropriately labeled with FCC asset tags, updated, reviewed, and certified quarterly by the Manager of Security and Technical Operations (MSTO) with the FCC Property Management Division.



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, of course, direct communication. This section contains information on the industry forums the PA participated in, and the issues that the PA submitted, as well as the feedback the PA received from the NOWG for 2013.

8.1 North American Numbering Council (NANC)

Neustar, as national PA, provided status reports for four scheduled meetings of the North American Numbering Council (NANC) in 2013. These reports provided the status of thousands-block Pooling administration and events affecting the performance of the PA.

The PA also participated in one NANC subgroup -- the Future of Numbering (FoN) Working Group. The following describes this committee:

8.1.1 Future of Numbering (FoN) Working Group

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. The PA attended the FoN working group meetings in 2013.

8.2 Industry Forums

As the national PA, our participation at industry forums includes:

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

The PA participated in the following industry forums in 2013:

- **Industry Numbering Committee (INC)** – the PA attended all six face-to-face meetings and eight virtual meetings. The PA submitted thirteen new issues and seventeen new contributions. For 2013, eleven issues (see Table 8-1) and fifteen contributions (See Table 8-2) were pooling-related; two issues (see Table 8-3) and two contributions (See Table 8-4) were p-ANI-related.

  In 2013, Tara Farquhar served as the Document Management/Maintenance (DMM) Subcommittee co-chair until June at which time the INC dissolved the subcommittees and began a single meeting structure.

- **Common Interest Group on Rating and Routing (CIGRR)** – the PA participated in the four CIGRR meetings and at least 10 conference calls. The PA submitted one new issue and continued to work one previously submitted issue in 2013 (see Table 8-5). We continued to review and update the BCR no NXD and 3E validation reports prior to the reports being sent to the Administrative Operating Company Numbers (AOCNs). This includes making updates to BIRRDS BCD/BCR records when necessary or updating/removing data that is incorrect or should no longer appear on the report. The BCRnoNXD and 3E report are monthly reports. When requested we also researched other data comparison requests. We continue to address issues and concerns from participants (some resulting in INC issues).

- **Local Number Portability Working Group (LNPA WG)** – the PA participated in all monthly LNPA WG meetings as a subject matter resource. We attended one face-to-face meeting in 2013 as a subject matter expert in addressing questions on a presentation given on number allocation.

- **Emergency Services Interconnection Forum (ESIF)** – the PA, as p-ANI Administrator, participated in ESIF meetings in 2013. Amy Putnam was re-elected co-chair of the ESIF-ECDR (Emergency Call & Data Routing) subcommittee, and, in that capacity, participated in the ESIF Advisory Group meetings. There were no ESIF issues presented in 2013.

In all, the PA participated in 62 industry meetings either in-person or by conference call in 2013.

Table 8-1
2013 Pooling INC Issues

INC Meeting Number	Issue Number	Supporting Contribution Number	Issue/Contribution Title
INC 128	751	RAM-079	Clarify Section 8.3.11 of the TBPAG (instances where a TN is assigned to more than one customer)
INC 129	755	RAM-085	Update appropriate interconnection documentation in Section 4.3.1.2 of the TBPAG and 4.2.2 of the COCAG
INC 130	759	759contr01_ v01	Updates to the block expedite timeframes due to upcoming changes to the NPAC 5-business day first-port notification
INC 131	761	761_contr01_v01	Update to the PAR regarding pooling related issues in Initial Closure
INC 132	764	764contr01_v01	Changes to block donations and ISP port requests
INC 132	765	765contr01_v01	Updates to the Part 1A form
INC 132	766	766contr01_v01	Supporting evidence of authorization to provide service must be linked to application for thousands-blocks/codes
INC 132	767	767contr01_v01	Updates to TBPAG Appendix 5: User Profile Application
INC 132	768	768contr01_v01	Updates to the part 1B Form
INC 133	770	770_contr01_v01	Updates to the TBPAG Part 3 Form
INC 133	772	772contr01_v01	Update to the TBPAG Appendix 3: MTE & Certification Worksheet

Table 8-2
2013 Pooling INC Contributions

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 128	RAM-079	Clarify Section 8.3.11 of the TBPAG (instances where a TN is assigned to more than one customer)	Issue 751: Clarify Section 8.3.11 of the TBPAG (instances where a TN is assigned to more than one customer)
INC 129	RAM-085	Update appropriate interconnection documentation in Section	Issue 755: Update appropriate interconnection documentation in Section 4.3.1.2 of the TBPAG and

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
		4.3.1.2 of the TBPAG and 4.2.2 of the COCAG	4.2.2 of the COCAG
INC 129	RAM-082	Updates regarding pooled code returns in the COCAG Appendix C and the TBPAG	Issue 740: Allow pooled NXXs with ports to be returned via PAS (when there are blocks assigned to other SPs)
INC 130	759contr01_ v01	Updates to the block expedite timeframes due to upcoming changes to the NPAC 5-business day first-port notification	Issue 759: Updates to the block expedite timeframes due to upcoming changes to the NPAC 5-business day first-port notification
INC 130	RAM-083	Additional updates to the COCAG Appendix C for pooled code returns	Issue 740: Allow pooled NXXs with ports to be returned via PAS (when there are blocks assigned to other SPs)
INC 131	761_contr01 _v01	Update to the PAR regarding pooling related issues in Initial Closure	Issue 761: Update to the PAR regarding pooling related issues in Initial Closure
INC 131	740contr03_ v01	Flowcharts of COCAG Appendix C, Section 5.6, 5.7 and 5.8	Issue 740: Allow pooled NXXs with ports to be returned via PAS (when there are blocks assigned to other SPs)
INC 132	764contr01_ v01	Changes to block donations and ISP port requests	Issue 764: Changes to block donations and ISP port requests
INC 132	765contr01_ v01	Updates to the Part 1A form	Issue 765: Updates to the Part 1A form
INC 132	766contr01_ v01	Supporting evidence of authorization to provide service must be linked to application for thousands-blocks/codes	Issue 766:Supporitng evidence of authorization to provide service must be linked to application for thousands-blocks/codes
INC 132	767contr01_ v01	Updates to TBPAG Appendix 5: User Profile Application	Issue 767:Updates to TBPAG Appendix 5: User Profile Application
INC 132	768contr01_ v01	Updates to the part 1B Form	Issue 768:Updates to the part 1B Form
INC 133	770_contr01 _v01	Updates to the TBPAG Part 3 Form	Issue 770: Updates to the TBPAG Part 3 Form

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 133	772contr01_v01	Update to the TBPAG Appendix 3: MTE & Certification Worksheet	Issue 772: Update to the TBPAG Appendix 3: MTE & Certification Worksheet
INC 133	764cont02_v02	Additional updates to ISP Block Port requests	Issue 764: Changes to block donations and ISP port requests

Table 8-3
2013 p-ANI INC Issues

INC Meeting Number	Issue Number	Supporting Contribution Number	Issue/Contribution Title
INC 129	756	NARP-031	Change the title of the annual RNA report in Section 5 to the "p-ANI Activity and Exhaust Report"
INC 133	771	771contr01_v01	Supporting evidence of authorization to provide service must be linked to application for p-ANIs

Table 8-4
2013 p-ANI INC Contributions

INC Meeting # Presented	Contribution number	Contribution Title	Issue Number/Title
INC 129	NARP-031	Change the title of the annual RNA report in Section 5 to the "p-ANI Activity and Exhaust Report"	Issue 756: Change the title of the annual RNA report in Section 5 to the "p-ANI Activity and Exhaust Report"
INC 133	771contr01_v01	Supporting evidence of authorization to provide service must be linked to application for p-ANIs	Issue 771: Supporting evidence of authorization to provide service must be linked to application for p-ANIs

Table 8-5
2013 Pooling CIGRR Issues

CIGRR Meeting Presented	Issue Number	Issue Title
Oct. 2010	C182	Pooled NXXs where the COC-TYPE is changing to/from an oddball COC_TYPE
Aug. 2013	C203	Consider modification to the 7 day entry restriction and rescheduling of records in BIRRDS for BCD/BCR and NXD-X/MBU records

8.3 Working with the Numbering Oversight Working Group (NOWG)

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 that arise during the year. The entire PA management team meets with the NOWG to participate on the monthly calls and in the annual performance review process, including the operational review.

Each month in 2013, the NOWG and PA met via conference call to discuss the PA's performance during the previous month. The 2013 PA and the NOWG meeting dates were: January 25, February 26, March 26, April 30, May 29, June 25, July 16, August 27, September 16, October 18, November 19, and December 17.

Prior to each monthly meeting, the PA updates an agenda and then reviews the information with the NOWG during the meeting. The standing agenda items are:

- 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 7 calendar days
- Reasons that applications were not processed within 7 calendar days
- Percent of calls returned within one business day
- Formal complaints and corrective action plans to resolve complaints
- FCC and/or NANC News
- INC read out (initial closure and new issues)
- P-ANI
- Change orders
- Pooling-related activities
- Regulatory updates
- Customer focus
- Tracking log
- Next meeting
- Other items that do not fall into any of the above categories

In addition to the agenda items above, the PA provides the following other reports to the NOWG for the monthly meetings:

- NOWG Blocks Report Information Summary
- NOWG Summary Data
- PA NOWG Issue List
- PA NANC monthly report

In all, the PA provided 38 reports and 171 customer focus items to the NOWG for the monthly meetings in 2013. Of the customer focus items, 116 were pooling-related and 55 were p-ANI-related.

The NOWG performed the 2012 PA annual operational review on March 13-14, 2013, in our Concord, CA office, and rated the PA performance as “Exceeded” expectations by using the following inputs:

- 2012 Performance Feedback Survey from service providers and regulators,
- Written comments and reports,
- Annual Operational Review, and
- NOWG observations and interactions with the PA.

As a result of the review, the NOWG made three suggestions for continuous improvement of pooling administration that the PA took under consideration (See Table 8-6). The PA continues to work cooperatively with the NOWG to make desired industry improvements while also meeting our contractual requirements.

Table 8-6
NOWG Suggestions for PA improvements

NOWG Suggestion	PA Improvement
Ongoing review of internal training processes to ensure that consistency in understanding the processes and responding to service providers and regulators is communicated to the PA and RNA personnel.	The PA continually trains the staff. If there is an issue or a process change, the staff reviews that issue and or process. During staff meetings, *Methods and Procedures* (M & Ps) are reviewed, as are any changes to guidelines or processes.
Ongoing review of the PA and RNA website to ensure accuracy and timeliness of data.	The websites are reviewed often and changes are made whenever it is appropriate or new information needs to be added. The PA and RNA also have a formal review of the website once a year to make sure all data on the websites are current.
Continue to consider process or system enhancements suggested by regulators and service providers.	We continue to take system enhancements into consideration. We will be providing a new PAS system as part of the new contract that will take into consideration regulatory and SP requests.

The NOWG provides recommendations to the FCC on all PA change order proposals. The PA did not submit any change orders proposals to the FCC in 2013. However, we did submit a letter in lieu of a change order for Issue 740 (see Section 2.3.2).

The PA reviewed the NANC survey for the 2013 performance and prepared it for website posting and distribution in January 2014.

8.4 Formal Complaints

Pursuant to Section 2.9.4 of Attachment A of the FCC contract, 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 report back within a period of not more than 10 business days from the date of the complaint, 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.

In 2013, the PA received no formal complaints.

8.5 Pooling and Routing Number Administration Tips

8.5.1 Pooling Tip of the Quarter

The PA, on its own initiative, created the *Tip of the Month* in July 2003. In 2011, we changed it to the *Tip of the Quarter (Tip)* and 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, and internal intelligence, when processes need to be clarified. The *Tip* is sent via email to the PAS distribution list each quarter. The *Tip* provides helpful information regarding the PAS and thousands-block pooling process, as well as serving as a useful reference for all PAS users. If an issue arises that needs to be addressed between *Tip*s, we may send a *Supplemental Tip* rather than delay it until the next quarter. In 2013, we sent one *Supplemental Tip*.

Archive files for *Tip*s from previous years can be found on our website at http://www.nationalpooling.com/tools/archives/tips-archive/index.htm.

Table 8-9 lists all of the *Tip* topics that were covered by quarter in 2013.

Table 8-9
2013 Tips of the Quarter

Month	Topic
January	Assignments Needing Part 4 Report - To and From Date Range
April	Reviewing Available Blocks in PAS
June (Supplemental)	Changes to Acceptable Current Executed Interconnection Agreement for Proof of Facilities Readiness Documentation for Initial Resource Requests (INC Issue 755)
July	Using the Pool Tracking Report When Requesting an LRN
October	Supporting Documentation for Initial Thousands-Block and Pooled Code Requests

8.5.2 P-ANI Administration Tips of the Month

Building on the success of the pooling *Tips*, the p-ANI Administrator began sending the *Monthly P-ANI Tip (P-ANI Tip)* in April of 2012. Topics for the *P-ANI Tip* are generated when processes need to be clarified. The *P-ANI Tip* is sent via email to the RNAS distribution list each month. The *P-ANI Tip* provides helpful information regarding RNAS and the p-ANI request process, and serves as a useful reference for all RNAS users. Archive files for *P-ANI Tips* from can be found on our website at www.nationalpani.com. Table 8-10 lists all of the *P-ANI Tip* topics that were covered monthly in 2013.

Table 8-10
2013 p-ANI Tips of the Month

Month	Topic
January	NANPA Planning Letters
February	211 for VoIP and 511 for Wireless p-ANI Assignment Practice
March	Supporting Documentation for New p-ANI Requests
April	24X7 Emergency Company Contact Number
May	Disabling Registered RNAS Users
June	RNAS Passwords
July	211 for VoIP and 511 for Wireless p-ANI Assignment Practice
August	p-ANI Returns
September	Returning or Modifying Part of an Existing p-ANI Range
October	Supporting Documentation for New p-ANI Requests
November	Request Temporary Password for RNAS
December	Disabling Registered RNAS Users

8.6 Annual PA Performance Survey

As part of the ongoing focus on customer satisfaction, the PA publishes 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. The survey 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 reduced the total number of performance statements from 24 to four in 2012 and based on the positive feedback we continued with that format in 2013. We asked prospective survey participants to rate the statements on a scale of one to five, with one (1) being lowest and five (5) being highest.

We distributed the survey on August 5, 2013, with a deadline for responses of August 16. We received 73 survey responses, which is a slight increase from 2012, when we received a total of 71 survey responses. Of the responses received, 19 were from state regulators, which is a decrease from the 21 we received in 2012.

The overall average score for the four statements was 4.6 out of a possible 5.0, which is consistent with scores for the past five years.

We contacted respondents who made suggestions or comments and learned that many of the issues had already been addressed in change orders; others simply involved education. The new customer-suggested enhancements from these comments were incorporated into the requirements for the upcoming PAS upgrade.

Table 8-11 lists the actual questions and average survey response scores for 2013.

Table 8-11
2013 Annual PA Performance Survey Results

SURVEY QUESTION	AVERAGE SCORE
I am satisfied with the level of service provided by the Pooling Staff.	4.6
I am satisfied with the level of service provided by the Help Desk personnel.	4.5
I am satisfied with the level of service provided by the Pooling Administration System (PAS).	4.6
I am satisfied with the pooling website.	4.5

The 2013 survey responses demonstrate our continued focus on customer satisfaction. Comments from the survey are found throughout this document.

8.7 Pooling and Routing Number Administration (RNA) Customer Support / Help Desk

8.7.1 Pooling Administration Customer Support / Help Desk

The Pooling 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 2013, the CSR handled approximately 1,958 calls from customers, which is a slight increase from 2012. Table 8-12 shows the numbers of calls to the pooling Help Desk by year since 2009.

Table 8-12
Number of Help Desk Calls for Pooling Issues by Year from 2009 through 2013

YEAR	NUMBER OF HELP DESK CALLS
2009	3,400
2010	3,084
2011	2,537
2012	1,895
2013	1,958

8.7.2 Routing Number Administration (RNA) Customer Support / Help Desk

The P-ANI Administration Help Desk responds to p-ANI related questions and questions regarding RNAS user accounts and passwords. In 2013, the p-ANI Administration Help Desk handled approximately 143 calls. This was a 62% decrease from the 374 calls in 2012. The considerable decrease can be attributed to the educational efforts made during the first full year of P-ANI Administration.

8.8 Pooling and p-ANI Administration Trouble Tickets in 2013

8.8.1 Pooling Trouble Tickets Opened in 2013

In 2013, the PA opened two trouble tickets, as shown in Table 8-13. We report trouble tickets details each month in the "Monthly Pooling Metrics Report."

There are six reasons for opening a trouble ticket, as specified in Section 2.22.4 of the Pooling Work Statement:

- PAS deficiency
- Website deficiency

- Facsimile deficiency
- Voicemail deficiency
- Email deficiency
- Contractor ISP deficiency

Of the two trouble tickets opened by the PA in 2013, one was due to a PAS issue and the other was due to a PA email issue. We promptly developed a workaround for the email issue while it was being fixed so that no customer was unable to perform a desired function. The PAS issue did not require a workaround. At no time was any user's information compromised.

Table 8-13
Pooling Trouble Tickets Opened in 2013

Ticket Number	Date Opened	Type
1490	10/4/2013	Email Issue
1491	11/18/2013	PAS Issue

8.8.2 Pooling Trouble Tickets Closed in 2013

In 2013, the PA closed three trouble tickets, one of which was a carryover from 2012. The overall average time that a trouble ticket was open until resolution was 48 days, 1 hour, and 26 minutes. Information in the Table 8-14 below shows when each ticket was closed, and the amount of time each trouble ticket was opened.

Table 8-14
Pooling Trouble Tickets Closed in 2013

Ticket Number	Date Opened	Date Closed	Days/Hours/Minutes Opened
1488	11/14/2012	6/3/2012	142 days, 6 hours, 40 minutes
1490	10/4/2013	10/5/2013	15 hours, 50 minutes
1491	11/18/2013	11/19/2013	1 day, 5 hours, 50 minutes

Table 8-15 and Figure 7 show the total number of trouble tickets opened, by year, since 2009.

Table 8-15
Number of Pooling Trouble Tickets from 2009 through 2013

YEAR	NUMBER OF TROUBLE TICKETS
2009	11
2010	15
2011	4
2012	3
2013	2

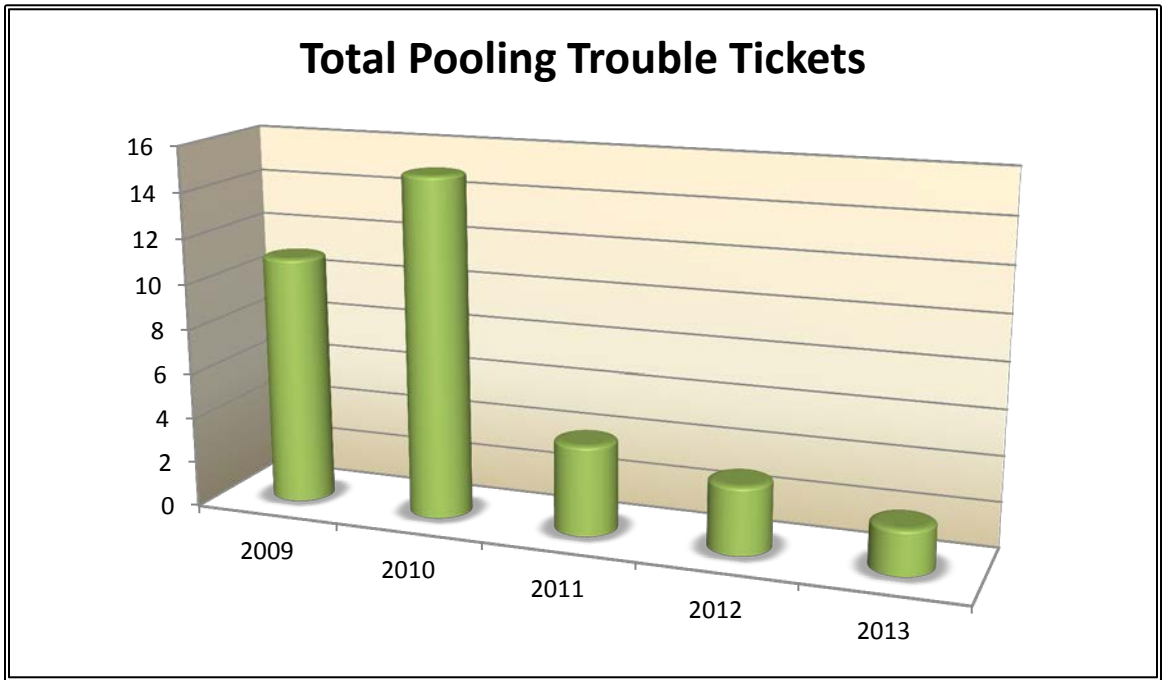


Figure 6 **– Summary of Total Trouble Tickets 2009 through 2013**

8.8.3 p-ANI Administration Trouble Tickets in 2013

There were no trouble tickets opened by the P-ANI Administrator in 2013.

Section 9
Volume of Reports Produced in 2013 - Aggregated by Regulatory Agency, NANC, NANPA, and Service Providers

This section identifies the total number of non-standard reports related to pooling and p-ANI that were sent to the FCC and state regulatory agencies in 2013 (See Section 9.1), and the total number of non-standard reports related to pooling and p-ANI that were 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 2013. These totals do not include standard reports that were obtained directly from the pooling website, the Pooling Administration System (PAS), or the Routing Number Administration System (RNAS), or the metrics reports that are posted only to the website.

9.1 Total Number of Non-Standard Reports Produced for FCC and State Regulatory Agencies

Table 9-1
Total 2013 Regulatory *Ad Hoc* Reports

Regulatory Agency	Total Number of Reports
FCC	99
States	422
Total	**521**

The total number of reports above includes:

- FCC: Contract Data Requirements List (CDRL), *ad hoc*, and other reports required by the contract.
- States: 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.

Table 9-2
Total 2013 Industry *Ad Hoc* Reports

Group	Total Number of Reports
NANC	16

Group	Total Number of Reports
NANPA	34
Service Providers	109
Total	**159**

The total number of reports above includes:

- NANC: Meeting reports for March, May, September, and December.
- NANPA: Reports for NANPA industry meetings or requested by NANPA, 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 and per Section 2.21.3, 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.
- States: reports provided to state regulators that are not directly obtained from the PAS or RNAS 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 PAS or RNAS.
- Other: reports not covered above, such as reports specially requested by the NANC or the NOWG other than those provided for regular meetings.

We produced 66 ad hoc reports in 2013, which is a 34% increase over the 48 reports we provided in 2012, which can be attributed to requested p-ANI reports. Table 9-3 summarizes the total number of ad hoc reports produced by the PA and P-ANI Administrator between January 1, 2013 and December 31, 2013:

Table 9-3
Total Number of 2013 *Ad Hoc* Reports

Group	Total Number of A*d Hoc* Reports	Pooling	P-ANI
FCC	3	3	
States	4	3	1
Service Providers	52	6	46
Other	7	7	
Total	**66**	**19**	**47**

Section 10
Trends in Pooling Since 2009[4]

When Neustar began administering number pooling trials in 1998, nearly every NPA was experiencing acceleration of exhaust dates. Many required extraordinary jeopardy procedures[5] to maintain enough resources until relief was implemented.

When state pooling trials began in 1999, there were 73 NPAs in jeopardy. There are currently 3 NPAs in a jeopardy status, compared to 17 in 2010, and only one of these, Illinois 217, has been declared in jeopardy since the rollout of national thousands-block number pooling began in 2002.

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.

This section contains pooling statistics that illustrate the impacts and activity trends in the pooling environment between 2009 and 2013, with the exception of Section 10.1 and 10.2.3.

10.1 NXXs Saved by Pooling

The PA calculates that 60,744 NXXs have been saved by pooling since pooling began, which is the equivalent of almost 78 NPAs.

Table 10-1 illustrates by NPA/NPA complex[6] the 60,744 NXXs that have been saved in 50 states and the District of Columbia and Puerto Rico with number pooling. NXXs have been saved in all NPA areas.

[4] Except Section 10.1 and 10.2.3 which is since pooling began.
[5] NANPA declares "jeopardy" in area codes for which the supply of NXXs could exhaust before relief can be provided.
[6] An NPA complex is the combination of all NPAs tied to any specific geographic rate center, including overlay NPAs.

neustar

Table 10-1
NXXs Saved by Pooling

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
201/551	New Jersey	298
202	District of Columbia	21
203/475	Connecticut	255
205	Alabama	195
206	Washington	53
207	Maine	563
208	Idaho	225
209	California	338
210	Texas	18
212/646/917	New York	29
213	California	60
214/469/972	Texas	388
215/267	Pennsylvania	406
216	Ohio	55
217	Illinois	290
218	Minnesota	224
219	Indiana	229
224/847	Illinois	564
225	Louisiana	127
228	Mississippi	60
229	Georgia	100
231	Michigan	457
234/330	Ohio	589
239	Florida	131
240/301	Maryland	506
248/947	Michigan	338
251	Alabama	84
252	North Carolina	324
253	Washington	108
254	Texas	143
256/938	Alabama	255
260	Indiana	219

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
262	Wisconsin	248
269	Michigan	428
270	Kentucky	308
272/570	Pennsylvania	512
276	Virginia	177
281/713/832	Texas	435
302	Delaware	264
303/720	Colorado	107
304/681	West Virginia	639
305	Florida	19
305/786	Florida	76
307	Wyoming	106
308	Nebraska	56
309	Illinois	133
310/424	California	333
312/872	Illinois	20
313	Michigan	99
314	Missouri	69
315	New York	481
316	Kansas	65
317	Indiana	263
318	Louisiana	250
319	Iowa	102
320	Minnesota	242
321	Florida	56
321/407	Florida	183
323	California	198
325	Texas	64
331/630	Illinois	325
334	Alabama	248
336	North Carolina	275
337	Louisiana	178
339/781	Massachusetts	461

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
347/718/917/929	New York	220
347/718/929	New York	35
351/978	Massachusetts	576
352	Florida	298
360	Washington	332
361	Texas	231
385/801	Utah	139
386	Florida	159
401	Rhode Island	146
402/531	Nebraska	222
404/470/678	Georgia	26
405	Oklahoma	255
406	Montana	234
408/669	California	152
409	Texas	150
410/443/667	Maryland	742
412/878	Pennsylvania	245
413	Massachusetts	340
414	Wisconsin	36
415	California	179
417	Missouri	286
419/567	Ohio	754
423	Tennessee	241
425	Washington	138
430/903	Texas	376
432	Texas	66
434	Virginia	183
435	Utah	112
440	Ohio	376
442/760	California	622
458/541	Oregon	542
470/678/770	Georgia	384
478	Georgia	117
479	Arkansas	72
480	Arizona	19
484/610	Pennsylvania	790
501	Arkansas	147

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
502	Kentucky	177
503/971	Oregon	265
504	Louisiana	33
505	New Mexico	110
507	Minnesota	221
508/774	Massachusetts	918
509	Washington	292
510	California	188
512/737	Texas	222
513	Ohio	149
515	Iowa	153
516	New York	171
517	Michigan	345
518	New York	457
520	Arizona	91
530	California	510
534/715	Wisconsin	206
539/918	Oklahoma	237
540	Virginia	355
559	California	324
561	Florida	131
562	California	129
563	Iowa	76
571/703	Virginia	207
573	Missouri	610
574	Indiana	141
575	New Mexico	138
580	Oklahoma	206
585	New York	320
586	Michigan	152
601/769	Mississippi	312
602	Arizona	11
603	New Hampshire	633
605	South Dakota	79
606	Kentucky	174
607	New York	211

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
608	Wisconsin	166
609	New Jersey	486
612	Minnesota	19
614	Ohio	178
615	Tennessee	239
616	Michigan	344
617/857	Massachusetts	266
618	Illinois	399
619	California	141
620	Kansas	247
623	Arizona	16
626	California	156
631	New York	635
636	Missouri	273
641	Iowa	128
650	California	193
651	Minnesota	89
657/714	California	229
660	Missouri	213
661	California	255
662	Mississippi	550
682/817	Texas	227
701	North Dakota	100
702	Nevada	47
704/980	North Carolina	429
706/762	Georgia	354
707	California	609
708	Illinois	397
712	Iowa	145
716	New York	353
717	Pennsylvania	423
719	Colorado	138
724/878	Pennsylvania	740
727	Florida	81
731	Tennessee	205
732/848	New Jersey	511
734	Michigan	388

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
740	Ohio	664
747/818	California	270
754/954	Florida	95
757	Virginia	157
763	Minnesota	55
765	Indiana	467
772	Florida	126
773/872	Illinois	138
775	Nevada	151
779/815	Illinois	604
785	Kansas	260
787/939	Puerto Rico	78
802	Vermont	330
803	South Carolina	275
804	Virginia	244
805	California	441
806	Texas	96
808	Hawaii	46
810	Michigan	384
812	Indiana	359
813	Florida	135
814	Pennsylvania	454
816	Missouri	232
828	North Carolina	279
830	Texas	274
831	California	161
843	South Carolina	225
845	New York	600
850	Florida	205
856	New Jersey	386
858	California	116
859	Kentucky	166
860	Connecticut	378
862/973	New Jersey	554
863	Florida	176
864	South Carolina	282
865	Tennessee	161

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
870	Arkansas	199
901	Tennessee	54
904	Florida	139
906	Michigan	151
907	Alaska	16
908	New Jersey	322
909	California	315
910	North Carolina	324
912	Georgia	134
913	Kansas	102
914	New York	358
915	Texas	34
916	California	177
919/984	North Carolina	258
920	Wisconsin	304
925	California	215
928	Arizona	137

NPA/NPA Complex	State	Quantity of NXXs Saved by Pooling
931	Tennessee	259
936	Texas	134
937	Ohio	525
940	Texas	117
941	Florida	141
949	California	104
951	California	317
952	Minnesota	21
956	Texas	187
970	Colorado	375
979	Texas	183
985	Louisiana	238
989	Michigan	543
Totals		**60,744**

10.2 Trends in Thousands-Block Number Pooling

The following sub-sections contain summaries of thousands-block number pooling statistics since 2009.

10.2.1 Pooling Charts

The following charts illustrate the many activity trends in the numbering environment between 2009 and 2013. Table 10-4 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 8 through 13 are graphic representations of each individual category.

Table 10-4
Pooling Activity from 2009 through 2013 At-A-Glance

	2009 Statistics	2010 Statistics	2011 Statistics	2012 Statistics	2013 Statistics
NXXs Opened for LRNs	553	688	531	442	532
NXXs Opened for Dedicated Customers	129	134	68	75	57
NXXs Opened for Pool Replenishment	1,273	1,845	2,175	2,071	2,022
Blocks Assigned by PA During Year	34,364	46,472	43,547	47,074	47,326
Total Assigned Blocks in PAS at Year End	253,087	291,010	334,557	368,661	401,186
Applications Processed	87,781	102,368	132,429	130,407	137,375

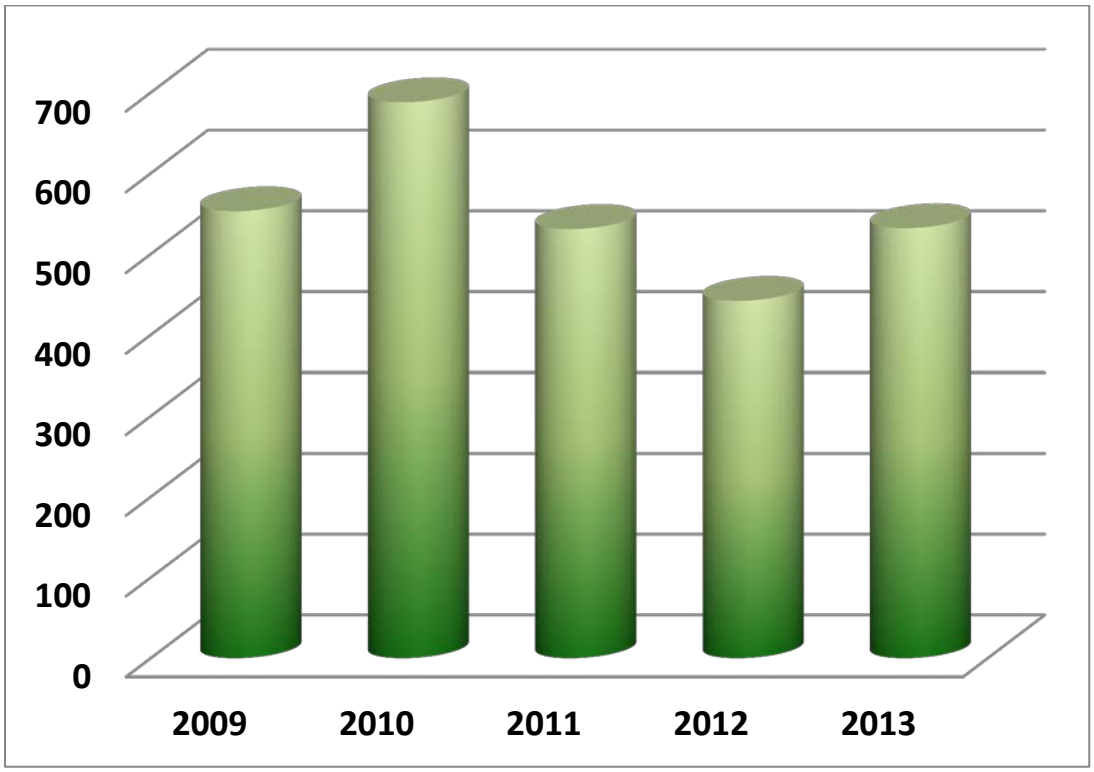


Figure 7: CO Codes Opened for LRNs from 2009 through 2013

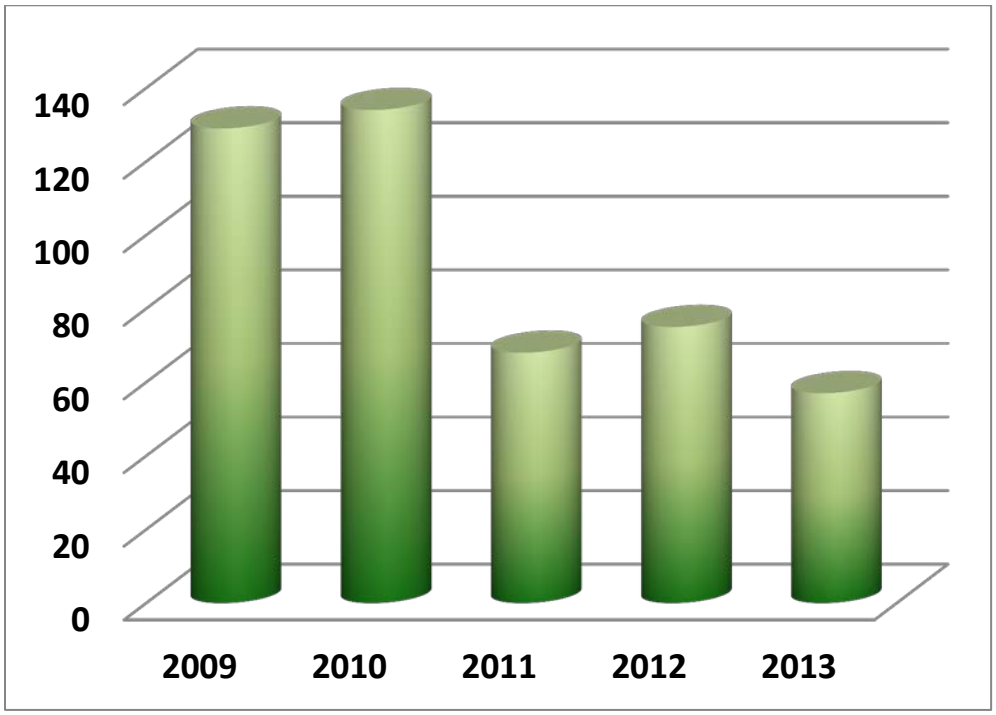


Figure 8: CO Codes Opened for Dedicated Customers from 2009 through 2013

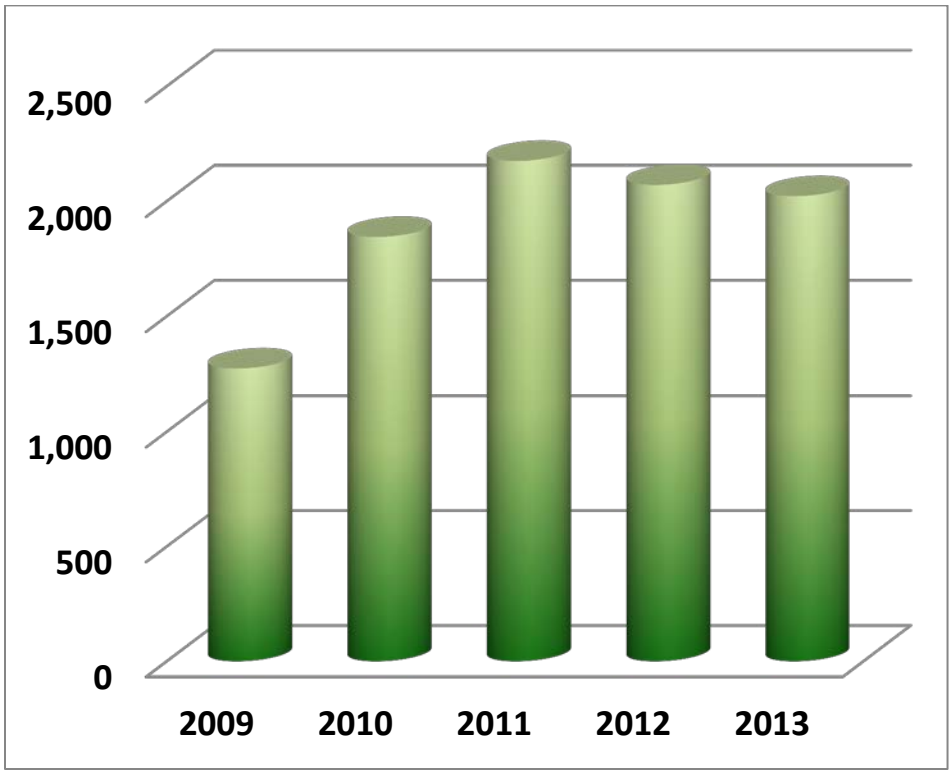


Figure 9: CO Codes Opened for Pool Replenishment from 2009 through 2013

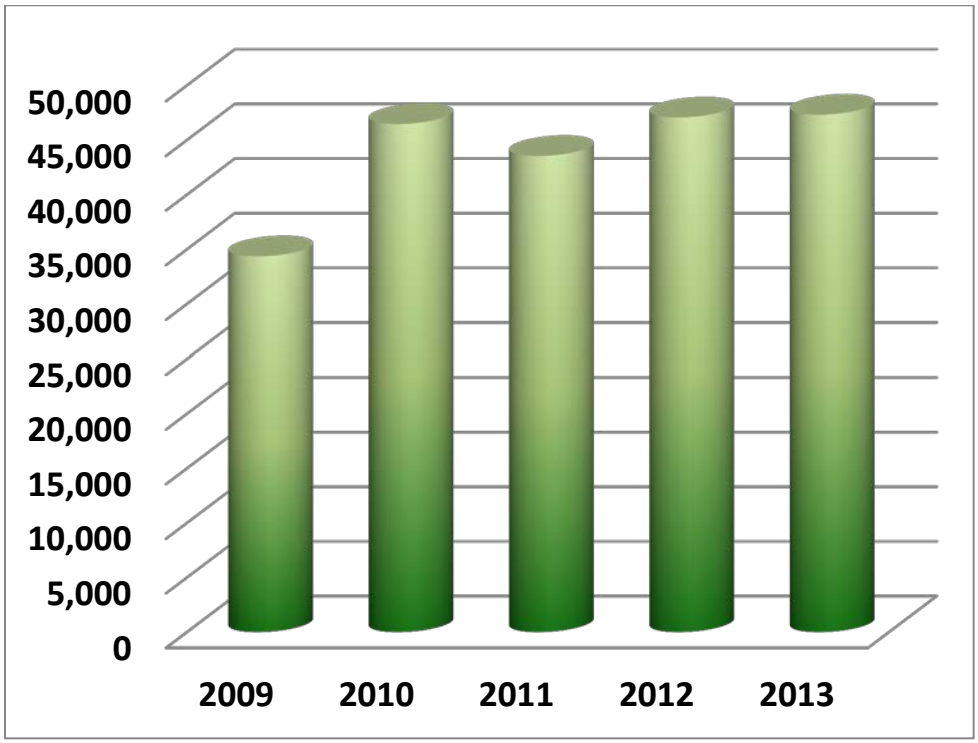


Figure 10: Blocks Assigned During Years 2009 through 2013

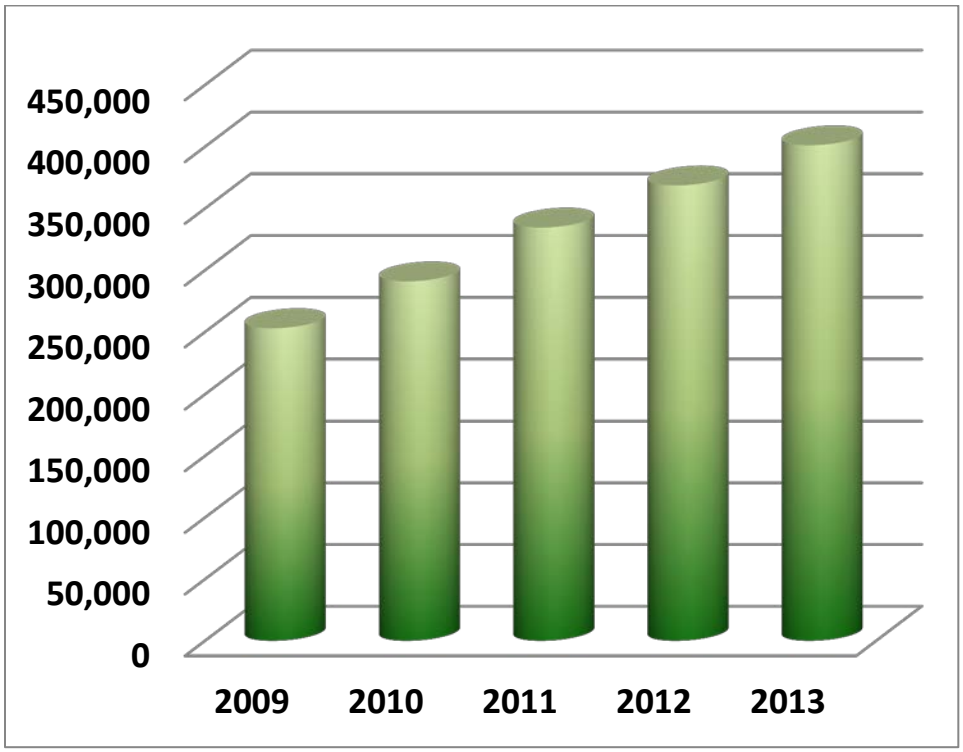


Figure 11: Assigned Blocks at End of Years 2009 through 2013

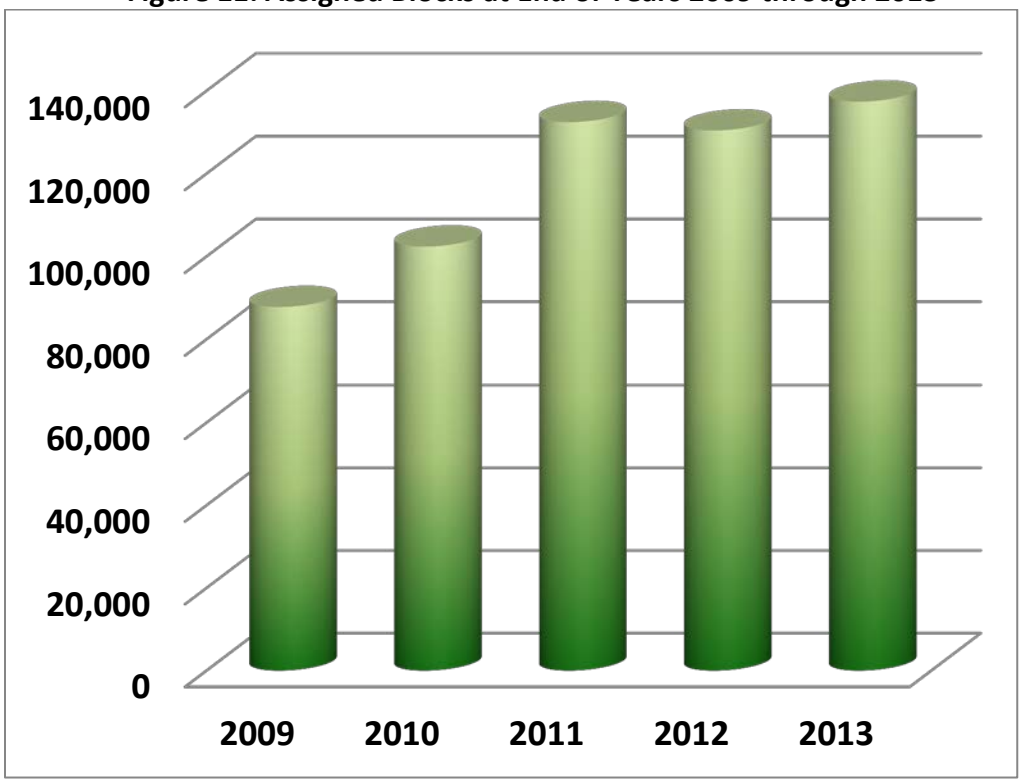


Figure 12: Applications (Part 3s) Processed From Years 2009 through 2013

10.2.2 Total Applications Processed (Part 3s) from 2009 through 2013

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. Each of these activities generates a Part 3.

Table 10-5 contains the total numbers of Part 3s processed by month from 2009 through 2013.

Table 10-5
Total Applications Processed (Part 3s) Since 2009

	2009	2010	2011	2012	2013
Jan	7,095	7,402	7,725	8,220	15,136
Feb	6,761	8,626	11,572	9,357	9,602
Mar	7,700	7,717	13,250	9,958	10,357
Apr	8,841	6,659	10,960	8,266	11,823
May	7,986	9,124	12,422	11,904	12,863
Jun	7,856	13,687	10,061	10,369	25,142
Jul	6,499	7,865	10,512	8,021	8,016
Aug	9,853	8,677	14,633	10,990	9,817
Sep	6,319	7,648	12,600	15,081	8,374
Oct	6,708	8,061	9,057	15,124	10,499
Nov	6,390	8,269	11,296	15,491	7,975
Dec	5,773	8,633	8,341	7,626	7,771
TOTAL	**87,781**	**102,368**	**132,429**	**130,407**	**137,375**

10.2.3 Cumulative Thousands Blocks Assigned Since 2002

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

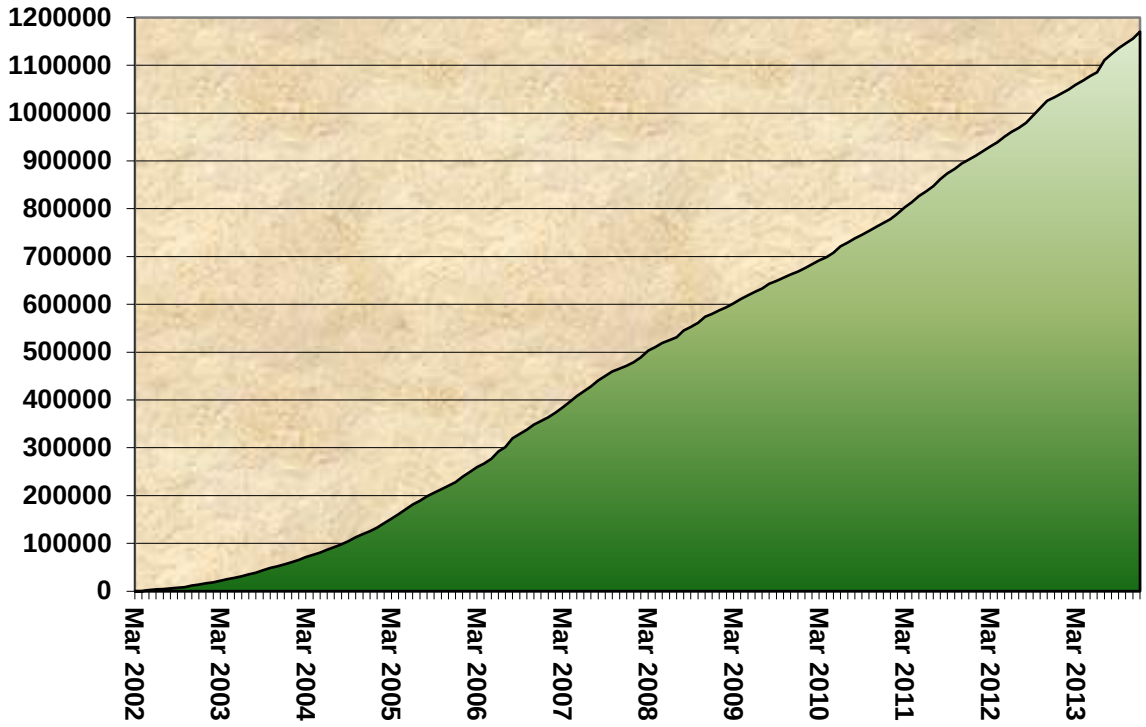


Figure 13: Cumulative Pooling Administration Applications (Part 3s) from March 2002 through December 2013

10.3 – Reclamation 2009 through 2013

The PA has been authorized to reclaim 345 blocks since 2009. Table 10-15 shows the total number of blocks reclaimed by state since 2009, ranked from highest to lowest.

Table 10-15
Total Number of Blocks Reclaimed by State from 2009 through 2013

State	2009	2010	2011	2012	2013	Total
CALIFORNIA				124	3	127
MICHIGAN	2	50	0	1		53
VIRGINIA	27	0	0	0	11	38
MARYLAND	0	17				17
COLORADO					17	17
NEW JERSEY	1				15	16
INDIANA	2	5	7			14
TEXAS	5	2	0	3		10

State	2009	2010	2011	2012	2013	Total
WASHINGTON		2	2	2	4	10
WISCONSIN	4	1		5		10
PENNSYLVANIA					9	9
ARKANSAS		5				5
NEW YORK	4					4
MASSACHUSETTS					3	3
GEORGIA	2					2
UTAH	2					2
HAWAII				2		2
ILLINOIS					2	2
NEW HAMPSHIRE			1			1
OREGON					1	1
FLORIDA					1	1
DISTRICT OF COLUMBIA					1	1
TOTAL	**49**	**82**	**10**	**137**	**67**	**345**

Table 10-16 shows, by year, the cumulative number of blocks on the reclamation lists each month, the total number of those blocks that were new each month since 2009, and the percent of new blocks to cumulative blocks, as well as how many blocks for which reclamation has been initiated by year since 2009. In 2013, the percent of new blocks to cumulative blocks declined for the first time since we began keeping track in 2009, and the number of new blocks on the list is the lowest for the reporting period.

Table 10-16
Summary of Reclamation from 2009 through 2013

Year	Number of Cumulative Blocks on the List	Number of New Blocks to the List[7]	Percent New Blocks to Cumulative Blocks on the List	Number of Blocks for which Reclamation has been Initiated[8]
2009	9,839[9]	1,962	20%	49
2010	6,156	2,026	33%	82

[7] We added new overdue Part 4s to the cumulative list in 2009.
[8] While a state may authorize the PA to initiate block reclamation, not all blocks in this category have actually been reclaimed. In some cases the reclamation process is halted if it is determined that the blocks are actually in service. For example, in 2012, the reclamation of 122 blocks was halted by the state commission just prior to the actual reclamation taking place.
[9] The precipitous drop in the number of blocks on the reclamation list in this year was directly attributable to the *Very Old Part 4 Project* pro-actively undertaken by the PA.

Year	Number of Cumulative Blocks on the List	Number of New Blocks to the List[7]	Percent New Blocks to Cumulative Blocks on the List	Number of Blocks for which Reclamation has been Initiated[8]
2011	10,070	3,655	36%	34
2012	7,631	2,508	33%	214
2013	6,145	1,921	31%	67

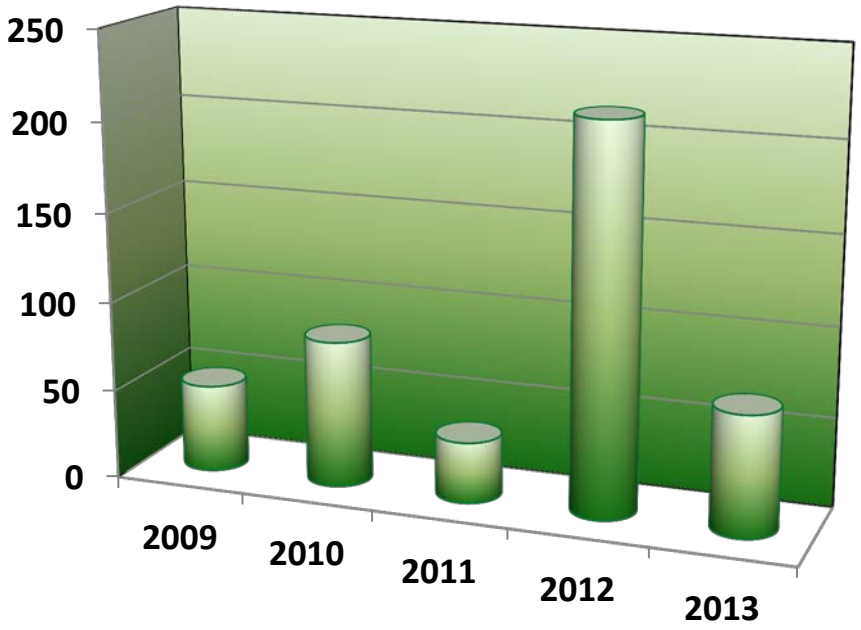


Figure 14: Blocks Reclaimed by Year from 2009 through 2013

10.4. Summary of Pooled Areas since 2009

The following sub-sections contain summary pooled area data since 2009.

10.4.1 Aggregated Pooled Areas – 2009 through 2013

Table 10-17 represents 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 2009. In the past five years of pooling, the total number of rate centers in pooling has increased approximately 8.5%, from 14,574 to 15,819. The number of service providers has increased approximately 7% from 2,406 at the end of 2009 to 2,570 at the end of 2013. 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 10-17
Aggregated Total Number of Service Providers and Pooling Areas from 2009 through 2013

Year	Total Number of Distinct Pooling Service Providers	Pooled Areas
2009	2,406	14,574
2010	2,467	15,148
2011	2,489	15,329
2012	2,505	15,418
2013	2,570	15,819

10.4.2 Pooling versus Excluded Rate Centers – 2009 through 2013

The number of pooling rate centers continued to increase in 2013. This is primarily the result of carriers entering excluded rate centers and implementation of delegated authority in Montana.

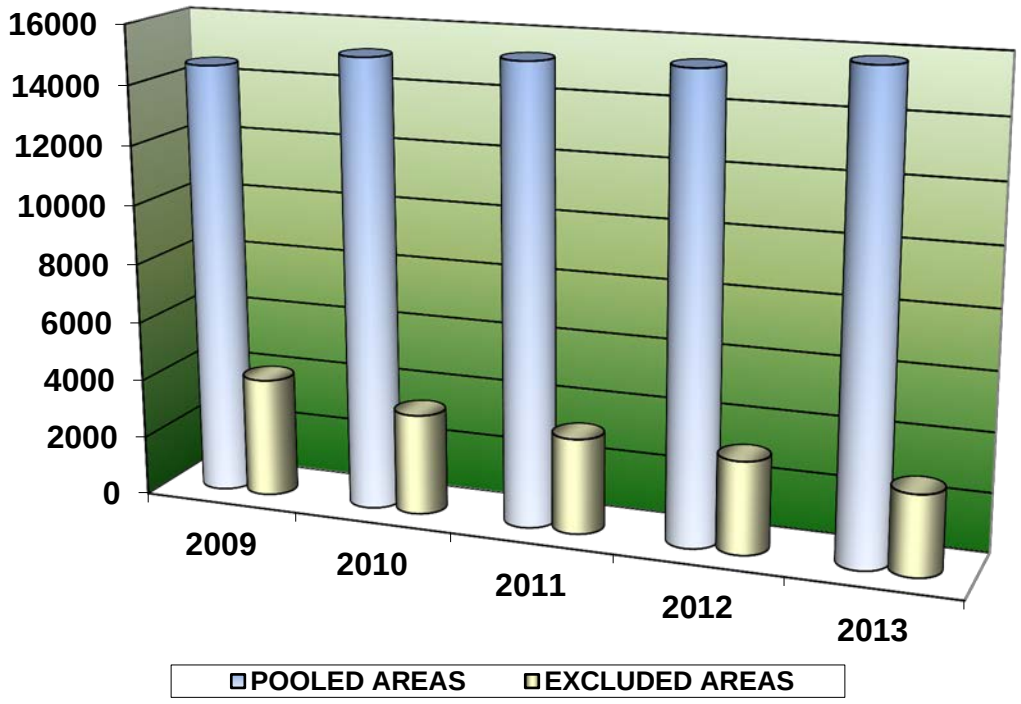


Figure 15: Pooling versus Excluded Rate Centers – 2009 through 2013

10.5.3 Total Number of Distinct Pooling Service Providers – 2009 through 2013

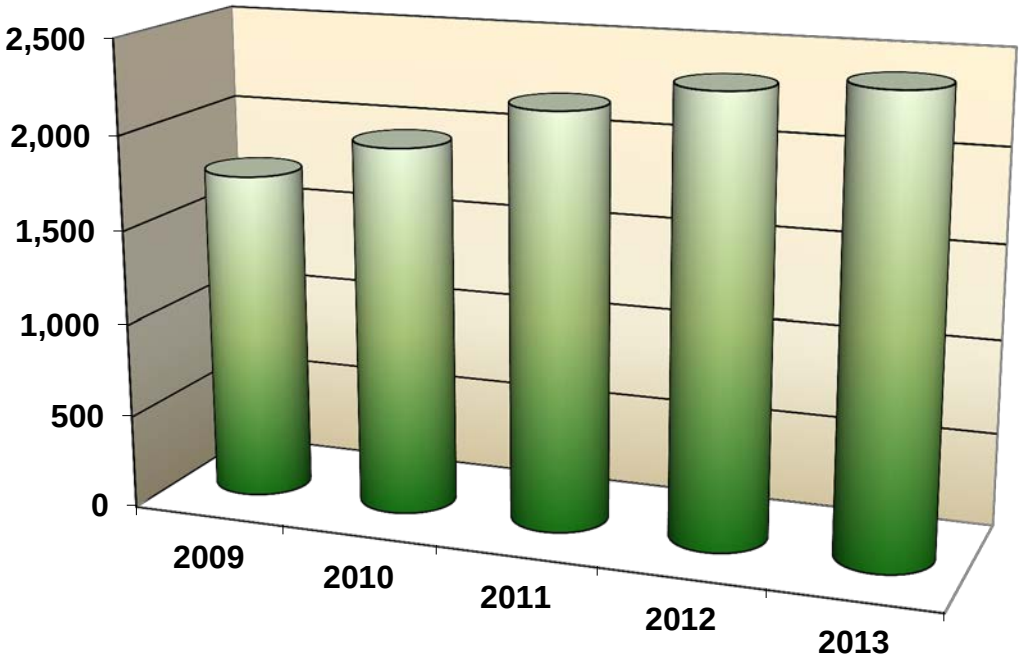


Figure 16: Total Number of Distinct Pooling Service Providers

Table 10-18 depicts the trends in rate center status between 2009 through 2013.

Table 10-18
Pooling Rate Center Facts Comparison by Year - 2009 through 2013

	2009	2010	2011	2012	2013
Total Number of Distinct Rate Centers	18,597	18,549	18,546	18,540	18,538
Total Number of Distinct Rate Centers Available for Pooling	14,574	15,148	15,329	15,418	15,819
Percentage of Distinct Rate Centers that are Available for Pooling	78.40%	81.70%	82.70%	83.20%	85.30%
Total Number of Mandatory Distinct Rate Centers	7,739	8,001	8,389	8,439	8,549

	2009	2010	2011	2012	2013
Percentage of Distinct Rate Centers that are Mandatory	41.60%	43.10%	45.20%	45.50%	46.10%
Total Number of Distinct Mandatory Single-Service Provider Rate Centers	1,088	1,073	1,261	1,205	1,181
Percentage of Distinct Rate Centers that are Mandatory Single-Service Provider	5.90%	5.80%	6.80%	6.50%	6.40%
Total Number of Distinct Optional Rate Centers	5,747	6,074	5,679	5,774	6,089
Percentage of Distinct Rate Centers that are Optional	30.90%	32.70%	30.60%	31.10%	32.80%
Total Number of Distinct Rate Centers Excluded from Pooling	4,023	3,401	3,217	3,122	2,719
Percentage of Distinct Rate Centers that are Excluded from Pooling	21.60%	18.30%	17.30%	16.80%	14.70%
Total Number of Rate Center Designations Changed (see Section 2.4.2 for detail)	348	960	892	170	963