

The State Scene

A Numbering Resource Publication for State Public Utility Commissions

Inside This Issue:

FCC Issues Responses to Order	2
Six Common Pooling Problems	3
Conference Call Schedule	4
States Consolidating Rate	
Centers	5

July

August

2000

FIFTEEN ADDITIONAL STATES GRANTED DELEGATED AUTHORITY BY FCC

On July 20, the Federal Communications Commission (FCC) delegated additional numbering authority to 15 states – Arizona, Colorado, Georgia, Indiana, Iowa, Kentucky, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania, Tennessee, Utah, Virginia, and Washington. This now brings the total to 26 states (including Illinois) that the FCC has granted such authority following petitions by those individual states.

In its Order, the FCC granted 12 of the 15 states the authority to institute thousands-block number pooling. Other provisions of the Order included:

- Granting authority to state commissions in Indiana, Missouri, North Carolina, Pennsylvania, Utah, and Virginia to maintain rationing procedures for six months following implementation of area code relief.

(continued on page 4)

FCC GRANTS NEUSTAR'S PETITION FOR ADDITIONAL FUNDS

In light of the recent NRO Order and its' subsequent impact on the North American Numbering Plan Administration (NANPA), the Federal Communications Commission (FCC) has ruled favorably on NeuStar's petition seeking additional funds to implement changes mandated by the Order.

On June 30 NeuStar filed a petition with the FCC stating that in order for NANPA to perform its expanded duties, as addressed in the NRO Order, it must hire additional personnel, purchase new equipment, and develop new computer software. Because NeuStar supports the goals of the NRO Order, the company's petition stated that it has already voluntarily implemented some changes required by the NRO Order. Many of these changes have been integrated into the company's operations, and therefore, NeuStar is not seeking compensation. However, some of the changes outlined in the

(continued on page 2)

STATE POOLING UPDATE

With the FCC's recent ruling on state's petitions for delegated authority, there are now 26 states that have been granted jurisdiction over numbering resource issues, including 23 states that were granted pooling authority. Of those 23 states, six – Illinois, California, New York, Texas, Maine, New Hampshire – have implemented thousands block number pooling in 14 NPAs. Florida and Connecticut will soon follow, and New York and California will be adding additional NPAs, bringing the total to 21 NPAs.

NeuStar serves as the number pooling administrator in all states and NPAs that have turned up pooling, and will also be responsible for the new NPAs in New York and California. NeuStar was selected to serve as the pooling administrator for Illinois in 1998, when the first-of-its-kind pooling trial began in the 847 NPA.

Below are highlights of recent State activity regarding number pooling.

(continued on page 4)




1120 Vermont Ave., NW
Washington, DC 20005
(202) 533-2600
www.neustar.com
www.nanpa.com
www.npac.com

FCC GRANTS NEUSTAR'S PETITION FOR ADDITIONAL FUNDS

(continued from cover)


NRO Order, NeuStar stated, justify and require adjustments to NANPA's compensation.

Major changes mandated by the NRO Order, that impact NeuStar and NANPA, include CO Code Administration and COCUS (Central Office Code Utilization Survey), now called NRUF (Number Resource Utilization Form). Changes to Code Administration center primarily on the areas of receiving and reviewing new forms of information which carriers must send to the NANPA to justify code requests. The changes to COCUS involve mostly the level and volumes of information to be received with the new NRUF.

On July 18, the FCC sent a letter to NeuStar that provides the NANPA to proceed with performance requirement changes in the NRO Order, especially those related to Central Office (CO) Code Administration. NeuStar's full petition can be found by contacting Brent Struthers. 

FCC ISSUES RESPONSES REGARDING THE NRO ORDER

On July 11, the FCC issued responses to questions submitted by NeuStar, service providers, state commissions and industry groups, to clarify different aspects of the NRO Order, which the FCC issued on March 31. The NRO Order took action with regard to numbering administration, adopting administrative and technical measures allowing it to more closely monitor the way numbering resources are used within the North American Numbering Plan (NANP). In the Order, the FCC also adopted certain cost recovery principles that are similar to those established for number portability, and sought further comment on which costs are eligible for recovery as carrier-specific incremental costs of thousands-block number pooling.

The FCC's full list of responses to the questions can be found at www.fcc.gov. Questions posed to the FCC for clarification ranged from utilization data to states' authority regarding numbering resources to CO Code assignments and NPA relief planning. 

NANPA ANNOUNCES NEW STAFF CHANGES

Sandy Tokarek, former Senior NPA Relief Planner in the Central Region, has been named as NANPA's Regional Director – Code Administration. Tokarek succeeds Bruce Bennett, who resigned in June. Tokarek joined NANPA in April 1, 1998, as a Relief Planner, and was promoted to Senior Relief Planner in June 1999. Prior to joining NANPA, she was Public Affairs Manager at AT&T Wireless. Tokarek will be based in NANPA's Concord, Calif., office.

Frank Colaco, an NPA Relief Planner in the Eastern Region, has been promoted to Senior NPA Relief Planner in the Central Region, replacing Tokarek. Colaco joined NANPA in March 1999.

George Light, Senior Code Administrator for NANPA's Eastern Region, has transferred to the NPA Relief Staff as an NPA Relief Planner for the Central Region. Light joined NANPA in June 1998 and was promoted to Senior Code Administrator in June 1999. Prior to joining NeuStar, Light worked five years for Pacific Telephone.

Florence Weber, former Code Administrator for the Eastern Region, has been promoted to Senior Code Administrator, and will have cross-regional responsibility for the methods and procedures associated with CO Code Administration. Weber joined NANPA in February 1999.

Craig Wiseman and Ben Childers, former NPA Relief Planners for the Western and Central regions, respectively, recently resigned to pursue other opportunities in the telecom industry. 

SIX MOST COMMON POOLING PROBLEMS (AND SOLUTIONS)

In response to customer concerns and issues raised as number pooling is implemented in several states, NeuStar, as the interim pooling administrator for XX states, compiled a list of the five most common pooling problems – and solutions – that service providers have encountered. This list, which follows below, can also be found on www.numberpool.com.

1. Problem: Some Carriers in a pooling area are not able to process downloads from the NPAC with the pooling bit set. *Service affecting? - Yes*

Solution: Release 1.4 testing by all carriers in the pooling area. All carriers in a pooling area must test with the NPAC to make sure their LSMS can receive and correctly process the “Pooling bit” sent in 1K downloads. This means all carriers in the pooling area, not just pooling participants. Some state PUCs are requesting that the carriers positively report to the state whether or not they have completed testing prior to the start of pooling.

2. Problem: Wrong Point Codes (DPC, SSN, etc) entered on the pooling forms. *Service affecting? - Yes*

Solution: Point codes are used in SS7 message routing, and are not a familiar concept to most numbering personnel (actually, most numbering personnel have no idea what point codes are). Individual companies must either train their numbering folks in this concept and what is required, or provide them with the information they need. If you do not know what to put in these fields, do not just fill in numbers on the forms. Please ask someone in your company who is familiar with SS7 what should be entered. This is service affecting.

3. Problem: Some carriers are not intra service provider porting contaminated numbers in blocks before donating the blocks to the PA. When the block is then ported to a new service provider, the contaminated numbers can no longer receive calls from other companies in the network. *Service affecting? - Yes*

Solution: Verify available blocks for contamination and intra service provider port any contaminated numbers before donating blocks to the pooling administrator. Failure to follow this simple rule will result in your customers being upset.

4. Problem: Some carriers have continued to assign numbers in blocks they have donated to the pool. *Service affecting? - Yes*

Solution: - Make sure that all processes and procedures are in place to prevent assignment of numbers in blocks that you have donated to the pool. Once blocks have been donated to the PA, they no longer belong to the donating company and the donating company cannot continue to assign numbers in these blocks. If you continue assigning numbers in these blocks, once the block is assigned and ported to the new carrier, those numbers which you have assigned prior to this point will not receive incoming calls from other networks. If numbers are assigned after the block has been ported to a new service provider, your customer’s calls may go to another network where the call may be routed to intercept or to another customer in a different network.

5. Problem: Companies donating blocks have not had the NPA-NXX opened in the NPAC as a ported prefix. This is a portability issue which affects the ability to port a 1K block to a new carrier. *Service affecting? - No*

Solution: When first opening a code, make sure that the NPAC is aware that this prefix is portable. This can delay the effective date for a carrier receiving a 1K block.

6. Problem: Companies donating blocks want to take blocks back after the donation date. *Service affecting? - Possibly under certain conditions*

Solution: Companies must make sure they have correctly identified the blocks they need to keep prior to the Block Donation date. Once blocks are donated (after the donation date), the numbers in the blocks can no longer be assigned by the donating company and are subject to assignment at any time by the pooling administrator. Companies requesting the return of a block after the donation date (if the block is still available) will be requested to initiate a Part 1 requesting the block be assigned to them. **NEUSTAR**

REGIONAL CONFERENCE CALLS

Central Region

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

Thurs., August 17,

10 a.m. (CST)

Bridge: 888-490-6952

Passcode: 6106495

Western Region

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

Thurs., August 17,

11 a.m. (PST)

Bridge: 888-490-6952

Passcode: 6102416

Eastern Region

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

Fri., August 18,

11 a.m. (EST)

Bridge: 888-490-6952

Passcode: 6100426

15 STATES GRANTED AUTHORITY *(continued from page cover)*

- Granting the Missouri, North Carolina, and Virginia Commissions the authority to hear and address claims of carriers seeking numbering resources outside of the rationing process
- Granting the Missouri, Pennsylvania, and Utah Commissions the authority to implement NXX code sharing
- Granting the Arizona, Indiana, Missouri, Nebraska, Oregon, Tennessee, and Virginia Commissions the authority to conduct audits of carriers' use of numbering resources.

None of the 12 states has officially selected a pooling administrator or released an Order to implement their conservation measures. To date, NeuStar is the only company that can provide number pool administration functions immediately to states seeking to start pooling. The first state to implement number pooling – Illinois' 847 NPA – used a competitive bid process to select NeuStar to serve as the administrator for the first-of-its-kind trial that began in June 1998. Since that time, number pooling has extended the life of the 847 NPA over two years past its' pre-pooling exhaust date.

The FCC began granting delegated authority to states in September 1999, and NeuStar has been selected as the pooling administrator for 13 NPAs in six states: Illinois, California, New York, Texas, Maine, and New Hampshire. Florida and Connecticut have also selected NeuStar, and will be turning up pooling shortly. In addition, New York and California are in process of implementing number pooling in additional NPAs in which NeuStar will serve as the PA.

In addition to thousands block number pooling, several of the 15 state commissions recently granted delegated authority petitioned the FCC for authority to: (1) order the return of (reclaim) unused and reserved NXX codes; (2) monitor the use of numbering resources through the use of mandatory reporting requirements and number utilization forecasting; (3) require sequential number assignments; (4) require carriers to prove facilities readiness prior to obtaining numbering resources in an area; and (5) set and establish number assignment and NXX code allocation standards (including the requirement that carriers meet certain fill rates prior to obtaining additional numbering resources). The Utah Public Service Commission specifically sought the authority to require wireless carriers to provide necessary Central Office Code Utilization Survey (COCUS) and other information needed to carry out the Utah Commission's responsibilities. **NEUSTAR**

Granted State Petitions	Granted of Authority	Pooling Administrator	NPAs Selected
New York	9/15/99	NeuStar	212, 718, 716, 516
Florida	9/15/99	NeuStar	
Massachusetts	9/15/99	NeuStar*	
California	9/15/99	NeuStar	310,415
Maine	9/29/99	NeuStar	207
Texas	11/30/99	NeuStar	512
Connecticut	11/30/99	NeuStar	860
Wisconsin	11/30/99		
Ohio	11/30/99		
New Hampshire	11/30/99	NeuStar	603
NE, IN, UT, MO, IA TN, GA, NC, VA, WA AZ, PA, CO, KY, OR	7/20/00		
Pending State Petitions	Comments Due; Reply Comments Due		
New Jersey-filed 6/9/00	8/7/00; 8/22/00		

* NeuStar was selected as the PA by the MDTE decided to implement an overlay.

Table does not reflect the 847, 312, 630, 773, and 708 NPAs in Illinois, where NeuStar is the PA.

MANY STATES IMPLEMENTING RATE CENTER CONSOLIDATION

Many states are moving to implement a variety of number conservation measures. Because the FCC has sole jurisdiction over numbering matters, states must petition the FCC for delegated authority to implement conservation measures, such as thousand block number pooling. However, the FCC has determined that at least one conservation method – rate center consolidation – requires no further delegation of authority.

Rate centers are the specific geographic area used for rating and billing toll calls. Traditionally, carriers serving a geographic area require a prefix for each rate center within that geographic area, regardless of whether or not the carrier's marketing plans, or even the actual customer base in that area, justify a full prefix. Rate center consolidation works to lessen the impact of the rate center design on NPA exhaust by decreasing the overall number of rate centers with an NPA, thereby increasing the life of the NPA. Some of the issues experienced in addressing rate center consolidation are proper default routing of 911 calls, local calling areas, local and toll call revenues, and customer confusion with changes in calling scopes.

A number of states have either done significant work, or have successfully implemented rate center consolidation. While the following examples do not represent an exhaustive list of states addressing rate center consolidation, they highlight states' interest to consider rate center consolidation in their attempt to conserve numbers.

Missouri

Rate center consolidation was implemented in the 314 NPA in December 1999 (Case No. TO-98-212), and reduced the number of rate centers within the 314 NPA from 14 to 7. The Missouri Public Service Commission felt that it would provide longer term conservation benefits, while not forestalling the immediate need for relief in the 314 NPA. Implementation was expected to occur within 90 days of a Commission Order, and, because of its scope, would not affect toll calling and would have minimal consumer impact.

The Missouri Commission felt that widening the scope of the rate center consolidation effort would create impacts to calling scopes, local rates, LEC OSS' and networks, and might necessitate a review of cost recovery options and carrier revenue impacts. Rate center consolidation was a primary issue as the Commission discussed a geographic split of the 314 NPA (Case No. TO-98-212). Testimony has been filed for the upcoming 314/816 NPA case supporting implementation of a similar plan in the 816 NPA.

Arizona

The Arizona Corporation Commission approved a plan for consolidating rate centers in the 520 NPA serving the Tucson area. The seven Tucson rate centers were approved to be consolidated into a single rate center. The plan was implemented in June 2000. No local calling areas were affected by the consolidation effort.

Colorado

The Colorado Public Utilities Commission implemented an aggressive rate center consolidation plan in the 303 NPA. In this plan the new larger rate center encompasses all of Denver and consolidated 45 rate centers to 11. Local calling areas were changed significantly. Although

(continued on page 6)

**DO YOU HAVE
A
NEWSLETTER
IDEA?**

***Please send your
story ideas to***

***Rebecca.Barnhart
@neustar.com***

or

***BrentStruthers
@neustar.com***

***Change of address or to
be added to the mailing
list please contact
Rebecca Barnhart.***

MANY STATES IMPLEMENTING RATE CENTER CONSOLIDATION *(continued from page 5)*

the calling areas were affected, no rate case was allowed for the incumbent to make up for potential revenue losses. The Colorado Commission held public meetings throughout the 303 NPA before deciding to implement rate center consolidation. Because the new Denver rate center encompassed more than one county, necessary changes were made to the 911 system to allow for continued accurate default routing of 911 calls.

Florida


In October 1998, the Florida Public Service Commission opened a proceeding (Docket No. 981444-TP) to investigate number utilization and possible number conservation mechanism. An industry team, under the direction of the Florida Commission, was formed to investigate various conservation measures, and has looked at rate center consolidation for several NPAs throughout Florida. Specifically, a report is being prepared with a possible proposal for consolidating rate centers in the 305/786, 407/321, 561, 727, 813, 904 and 954 NPAs.

The Florida telecom industry has identified a key impact of rate center consolidation on existing networks. Some switches have limited capacity in the number of prefixes they can support. In consolidating rate centers, thereby expanding the size of the remaining rate centers, there will be more prefixes within each rate center. A switch with extremely limited capacity in terms of the number of prefixes it can support, may be placed in jeopardy of exhausting in the new larger rate center with more prefixes.

Texas

To conserve telephone numbers, the Public Utility Commission of Texas (PUCT) addressed rate center consolidation in 1998 (Project 18438). The PUCT authorized consolidation of 108 rate centers in Austin, Dallas, Fort Worth, Houston and San Antonio down to 31, lessening the total number of rate centers in those areas by 77. For example, the number of rate centers in Dallas were reduced from 27 to 7; in Houston, 35 to 22; in Austin, 15 to 2; in Fort Worth, 20 to 9; and in San Antonio, 29 to 1. holder.

Washington

The Washington Exchange Carrier Association (WECA), in cooperation with CLECs, wireless carriers, and the Washington Utilities and Transportation Commission, recently filed a report (file name: 2000/06/28 - UT-991627) with the Washington Commission on a plan to implement rate center consolidation in the 360 NPA. That plan called for consolidating 28 US West and GTE (Verizon) rate centers in to 7 new, larger rate centers. The WECA stated in their report that the consolidation of rate centers will not eliminate the need for another area code in the 360 area, but it can postpone the date at which a new area code is required. It also will enable more efficient number utilization in the future. The Washington Commission approved this plan for implementation. 

STATE POOLING UPDATE

(continued from page 2)

New York

Pooling for 516 began on July 1, and 16 blocks have been assigned. Currently, only uncontaminated blocks will be used until October 2. The New York Public Service Commission (NYPSC) is continuing to look for contaminated blocks so new CO codes do not need to be opened. However, if NeuStar receives a code request and there are no contaminated blocks available, the commission has indicated that the codes can be opened. In the 516 NPA, 1/3 of the CO codes have been set aside for pooling. Pooling for 518 is scheduled to begin on September 15, 2000.

Maine

NeuStar has assigned four blocks and has not had to open any full codes for the 207 NPA.

Connecticut

On June 14, the Connecticut Department of Public Utility Control (DPUC) ordered thousands block number pooling for the 860 NPA (Docket No. 96-11-10RE03). NeuStar was named as the pooling administrator. On July 26, the DPUC re-opened the docket to investigate motions filed against the decision. An initial Implementation meeting was held July 7. Implementation is scheduled for October 6.

Texas

The Public Utility Commission of Texas (PUCT) implemented number pooling in the 512 NPA on August 1. There have been a total of 8 blocks assigned.

Florida

An implementation meeting was held for the 561 NPA on August 3. For both the 561 and 954 NPAs, the industry will be protecting contaminated and non-contaminated blocks – uncontaminated blocks will be donated first. There will be a call after the pooling assessment is completed to review when contaminated blocks will be donated. The mandated pooling date for the 954 NPA is January 22, 2001, and for the 516 NPA, February 5, 2001. An initial implementation meeting is scheduled for 904 on September 28.

(continued on page 6)

A WORD FROM NEUSTAR'S CHAIRMAN AND CEO

Changes in technologies and the marketplace have been occurring at a remarkable rate. Competition among service providers has burgeoned, resulting in a dynamic environment where positioning, providing quality service to consumers, competitive strategy, and the ability to effectively evolve with the industry are critical. In addition, the authority of the State Commissions has broadened over the last year, which has provided them greater flexibility in this evolving process.



Jeff Ganek

At the core of these issues is the need for telephone numbers. For the industry to succeed, telephone numbers must be available. The reality of new service provider entrants, new services, and increased consumer utilization have put a strain on the numbering resource and have shown that the current distribution of numbers in blocks of 10,000 should not be continued into the future. The FCC, State Commissions and the industry are addressing this concern and providing solid, substantive solutions to this problem. Given the very nature of a highly competitive environment, these solutions—rate center consolidation, thousands block number pooling, and local number portability (LNP)—must be implemented rapidly, fairly, and produce the highest quality of results. There is no time for failure; there is no time for a learning curve.

As the leading neutral third party administrator to the industry, NeuStar is already in the unique and trusted position of most effectively assisting the states and industry in meeting these challenges. We provide a level of unquestioned neutrality that this environment requires. We have already successfully implemented LNP in the US and Canada, and in the number pooling arena, NeuStar is ahead of the game!

We have been working with the industry and the states to understand the real issues in how pooling works and what's needed on the states' end to implement number pooling. As the pooling administrator for six states and 13 NPAs (and growing), NeuStar is the only company in the marketplace today that can provide number pool administration functions for states. We have the proven infrastructure—designed specifically to meet the States' needs—in place to start implementing immediately. We have the required experience to ensure that the job is done right—from the start. And, we have the subject matter expertise to ensure that each State's objectives are continually met with the highest level of innovation, technology, and speed.

There's no guess work involved when a state chooses NeuStar to serve as its pooling administrator.

Serving in the role of a state's PA is one that NeuStar takes very seriously. NeuStar is the North American Numbering Plan Administrator and Local Number Portability Administrator as a result of open, fair competition. Our prices and service level standards have been determined through tough competitive processes. We always operate cognizant that competition is nearby – as demonstrated by our prices, responsiveness and quality. Our prices for pooling administration have been established after a full year of detailed analysis and negotiations with the NANC Working Group.

Twelve new states were recently granted delegated authority from the FCC on a variety of numbering resource issues. NeuStar stands ready to serve those states, if needed. Our interim processes are in place. We don't have to study anything. We know the guidelines, because we worked hand in hand with Illinois and New York – the first states to implement number pooling – to write the original document in which all the subsequent versions of guidelines have been based. We know what the issues are and have been the only vendor offering number pooling for over two years. When states have needed to implement pooling, NeuStar has been there to help where no one else could. More importantly, we look forward to continue working with the states and industry to provide proven, neutral third-party services.

A handwritten signature in black ink, appearing to read "Jeff Ganek". The signature is written in a cursive, flowing style.

NeuStar, Inc.
1120 Vermont Avenue, NW
Suite 550
Washington, DC 20005
(202) 533-2600
www.nestar.com



STATE POOLING UPDATE *(continued from page 6)*

New Hampshire

The industry met July 13 to discuss pooling in a Jeopardy environment. This is the second state to have a Pooling Jeopardy Meeting. There is not a standard industry process on pooling in a Jeopardy area, so each state is determining a process. (The first state to meet was New York in the 716 NPA.) There will be a follow-up call for NH on August 14 to finalize how the PA will allocate CO codes to the pooling participants. NANPA previously had a meeting to develop CO Code procedures on how to allocate CO codes to both LNP and non LNP capable carriers. Pooling for New Hampshire began May 1, and there have been 55 blocks assigned.

California

Number pooling began in the 415 NPA on July 29, and nine blocks have been assigned. The 714 NPA is scheduled to turn up pooling on October 6, followed by the 909 NPA on December 8. The CPUC issued a recent decision (00-07-052) on July 20. From this order, Imminent exhaust criteria will apply for those pooling carriers submitting growth requests, including Months to Exhaust being under 3 months. For Initial requests, Carriers are to show they are licensed and/or certified to provide service in the area in which they seek numbering resources, as well as ap-

propriate documentation that they will be in place to provide service within 60 days. The Utilization fill rate established for 310, will end on September 1.

For a complete list of the pooling timelines, please visit the numberpool.com web site. 

The State Scene

A Numbering Resource Publication for State Public Utility Commissions

Chairman and CEO, NeuStar, Inc.	<i>Jeff Ganek</i>
Senior Vice President, Operations	<i>Joe Franlin</i>
Chief, Regulatory Matters	<i>Brent Struthers</i>
Editor	<i>Rebecca Barnhart</i>
Layout/Design	<i>Tracy Keller</i>