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NANC Report and Recommendation on NeuStar's Petition

Initial Report Prepared by the Numbering Oversight Working Group; Revised by the NANC
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Executive Summary

On April 14, 2004, NeuStar filed a petition with the Federal Communications Commission (FCC) seeking a ruling for modification of some of the current FCC policies that prohibit NeuStar from undertaking certain types of transactions without the prior approval of the FCC. The FCC then asked the North American Numbering Council (NANC) to review NeuStar's request to determine whether any aspect of the requested relief, if granted, would affect NeuStar's compliance with the FCC's neutrality requirements. The FCC also requested input on how the grant of the requested relief would affect the FCC's and the NANC's ability to provide continuing oversight of NeuStar's operations as a neutral national numbering administrator. The Numbering Oversight Working Group (NOWG) undertook to prepare a report for NANC's consideration that addressed the FCC's request; however, this report is limited to a review of NeuStar's petition as it relates to the NANPA and PA functions.

The NOWG determined that the NeuStar request could lead to different sets of conditions for number administration neutrality; one for a publicly held company and another for a privately held company. However, there are no significant concerns with respect to number administration if the FCC grants NeuStar's request for modifying prior approval requirements for a publicly traded company, and no significant concerns with respect to a privately held company provided that the following safeguards are reaffirmed by the FCC before granting NeuStar's petition:

- Any interests of a Telecommunications Service Provider (TSP) or a TSP affiliate in NeuStar should not be allowed above the current limits that have been established by the FCC.
- Warburg's percentage equity should not be increased, whether held directly or through the voting trust, without FCC approval.
- NeuStar should be required to provide additional clarification on the specifics of any planned Initial Public Offering (IPO) and the transition plan related to the transfer of the voting trust to the shareholders of NeuStar to ensure that no aspects of neutrality are placed in jeopardy.
- If NeuStar remains a private company, neutrality requirements remain consistent with respect to Warburg and any undue influence that may be exercised on number administration.
- The NANC and the FCC should receive all Securities and Exchange Commission (SEC) publicly available NeuStar filings within one business day of the SEC filing. Other SEC filings should be furnished to the FCC and the NANC within one business day after the SEC makes it publicly available.
- Number administration federal contracts may need to be reviewed should any of the FCC Neutrality rules be modified in connection with the NeuStar request.

The FCC should also emphasize in any Order responding to NeuStar's request that it will have little tolerance for any violations of on-going neutrality requirements and that any neutrality violation may lead to the termination of NeuStar's federal numbering administration contracts.

Section 1.0 Introduction

1.1 NeuStar's Petition

On April 14, 2004, NeuStar petitioned the Federal Communications Commission (FCC) seeking a ruling that would allow certain types of transactions/decisions to be made by NeuStar without gaining the prior approval of the FCC regarding neutrality. NeuStar states that to seek this prior approval of any change in "overall ownership structure, corporate structure, bylaws, or distribution of equity interests" while it serves as NANP Administrator (both NANPA and PA functions) severely constrains their ability to conduct business effectively.

The changes NeuStar believes should not be subject to prior FCC approval fall into three general categories: (1) corporate changes that dilute or do not increase the rights of any entity affiliated with a TSP; (2) transactions that dilute or do not increase any interests of a TSP or a TSP affiliate in NeuStar; and (3) transactions that permit NeuStar to become a public company (including an IPO) and subsequent sales of NeuStar equity, subject to several limitations on TSP ownership. Specific types of changes requested by NeuStar falling into these general categories are detailed below:

1. Corporate changes that dilute or do not increase the rights of a TSP or an affiliate of a TSP.
    - (a) Changes to the Board's structure or size, provided that a majority of the directors are unaffiliated with Warburg and that no director is affiliated with a TSP.
    - (b) Changes to NeuStar's bylaws, charter or securities provided that such changes do not provide to an entity that is a TSP or an affiliate of a TSP any rights that are not enjoyed by other holders of the class of securities held by such entity.
    - (c) Changes to corporate structure, including reorganization into one or more subsidiaries or dispositions of subsidiaries.
2. Transactions that dilute or do not increase any interests in NeuStar of a TSP or an affiliate of a TSP.
    - (a) NeuStar may issue indebtedness to any entity, so long as the level of indebtedness is consistent with Section 52.12(a)(1)(ii) of the Commission's Rules.
    - (b) NeuStar may acquire, acquire an equity interest in, or provide debt financing to, any entity that is not a TSP or an affiliate of a TSP, consistent with Section 52.12(a)(1)(i) of the Commission's Rules.
    - (c) Pre-IPO, transactions in NeuStar equity so long as:
        - (i) No entity that is a TSP or an affiliate of a TSP acquires any equity interest in NeuStar;
        - (ii) Any entity's equity interest in NeuStar in excess of 9.9 percent shall be placed in the Voting Trust;
        - (iii) The percentage equity ownership of the Voting Trust remains above 50 percent; and
        - (iv) Warburg's percentage equity interest in NeuStar is diluted or not disproportionately increased.

3. Transactions that permit NeuStar to become a public company, including an IPO, and subsequent sales of NeuStar equity, subject to the limitations on TSP ownership set forth below.
   (a) Distribution of equity in an IPO where no entity will acquire more than 9.9 percent of the outstanding equity of NeuStar as a result of such offering.
   (b) Post-IPO trading of NeuStar equity consistent with the following conditions:
      (i) Any entity acquiring beneficial ownership of NeuStar equity of 9.9 percent or more shall be required to certify to NeuStar (within 10 business days of the time it is required under Securities and Exchange Commission ("SEC") rules to notify NeuStar of its ownership interest) whether it is a TSP or an affiliate of a TSP;
      (ii) Any such entity shall not be entitled to vote any equity in excess of 9.9 percent until it provides to NeuStar certification that it is not a TSP or an affiliate of a TSP. Such entity shall be required to divest such equity above 9.9 percent or place such excess equity in the Voting Trust, if necessary to enforce this requirement;
      (iii) Any entity beneficially owning 9.9 percent or more of NeuStar equity shall be required to report to NeuStar any change that affects the validity of its certification within 10 business days of the change's occurrence; and
      (iv) A majority of the board of directors shall consist of independent directors, as defined by NASDAQ or NYSE.

NeuStar proposes that prior approval no longer be required for the above types of changes and transactions. Prior FCC approval would continue to be required for all other changes within the existing scope of the prior approval requirement. Accordingly, NeuStar seeks Commission approval to transfer control of the company from the Voting Trust to the shareholders of NeuStar, collectively.

1.2 FCC/NANC Assignment

On April 22, 2004 the FCC sent NANC a letter seeking comments by May 28, 2004 on NeuStar's request. The FCC requests the North American Numbering Council (NANC) review the request to determine whether any aspects of the requested relief would impact NeuStar's current compliance with the Commission's Neutrality Requirements. In addition, the Commission asked whether the requested relief would affect the Commission's and the NANC's ability to provide continued oversight of NeuStar's operations as a neutral administrator?

1.3 Scope

The Numbering Oversight Working Group (NOWG) was formed by the NANC and is responsible to perform various duties and functions regarding the general oversight of the NANPA and the PA including the yearly performance review and the change orders associated with both. The NANC Chairman charged the NOWG with developing recommendations that are responsive to the FCC's letter by reviewing the NeuStar request and creating an analysis report for the NANC.

The NOWG recognizes that the NeuStar request may affect the entire NeuStar corporate structure. However, the NOWG has only been charged to review the structure as it relates to the NANPA and PA functions. The other areas of NeuStar's corporate entity could be addressed by the neutrality aspects of other business enterprise services.

Section 2.0 NANC's Existing Oversight Requirement

The North American Numbering Council (NANC) is a Federal Advisory Committee that was created to advise the Commission on numbering issues and to make recommendations that foster efficient and impartial number administration as directed by the Commission. The FCC charged the NANC to review the NeuStar request to determine whether any aspects of the requested relief would impact NeuStar's current compliance with the Commissions Neutrality Requirements, as well as whether the requested relief would affect the Commission and the NANC's ability to provide continued oversight of NeuStar's operations as a neutral administrator. It is within the FCC's purview to either monitor a cure to a neutrality violation or to terminate the vendor's contract. Both the current NANPA and PA contracts are renewed yearly.

Section 3.0 Neutrality

The NOWG determined that the NeuStar request could lead to two sets of conditions for neutrality for number administration, depending on the outcome of FCCs determination of NeuStar's request. There are two options to be considered:

- Publicly held company
- Privately held company

If NeuStar proceeds with its transformation into a publicly held company through an IPO a "transition mechanism" might be needed to facilitate a privately held company becoming public.

If the IPO does not go forward or if the NANPA/PA reverts from a publicly held company to a privately held company, the reverse process may be required to determine the new organizational effects on current neutrality requirements..

These are the parameters that the NOWG used in its review of NeuStar's Petition, the relief requested and the existing number administration neutrality requirements.

3.1 History *i.e.* LM transfer to NeuStar

In 1995, the FCC established the NANC and articulated its plan for selecting a neutral number administrator. The NANC established its plan for accomplishing this task in October of 1996. The NANC's NANPA Technical Requirements Document was released on February 20, 1997 and a designated neutral number administration vendor was recommended to the FCC for confirmation. The NANC's NANPA technical requirements document contained the original

three-part neutrality test. Lockheed Martin was the selected number administration vendor and was found to comply with these requirements as a publicly trade company.

These neutrality requirements state:

> 1.2 Neutrality
> As stated in the Telecommunications Act of 1996 (Section 251(e)(1)), the FCC is required to "create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis." Further, as stated in CC Docket No. 92-237, the new NANPA "should be a non-governmental entity that is not aligned with any particular telecommunications industry segment." Accordingly, the NANC, acting through its NANPA Working Group ("NANPA WG"), shall apply the following Neutrality Criteria to determine the neutrality of any respondent:
>
> 1) a respondent may not be an affiliate of any telecommunications service provider(s) as defined in the Telecommunications Act of 1996. "Affiliate" is a person who controls, is controlled by, or is under the direct or indirect common control with another person. A person shall be deemed to control another if such person possesses, directly or indirectly, (i) an equity interest by stock, partnership (general or limited) interest, joint venture participation, or member interest in the other person ten (10%) percent or more of the total outstanding equity interests in the other person, or (ii) the power to vote ten (10%) percent or more of the securities (by stock, partnership (general or limited) interest, joint venture participation, or member interest) having ordinary voting power for the election of directors, general partner, or management of such other person, or (iii) the power to direct or cause the direction of the management and policies of such other person, whether through the ownership of or right to vote voting rights attributable to the stock, partnership (general or limited) interest, joint venture participation, or member interest) of such other person, by contract (including but not limited to stockholder agreement, partnership (general or limited) agreement, joint venture agreement, or operating agreement), or otherwise;
>
> 2) a respondent and any affiliate thereof may not issue a majority of its debt to, nor may it derive a majority of its revenues from any telecommunications service provider. "Majority" shall mean greater than 50 percent, and "debt" shall mean stocks, bonds, securities, notes, loans or any other instrument of indebtedness; and
>
> 3) notwithstanding the Neutrality Criteria set forth in 1) and 2) above, a respondent may be determined to be or not to be subject to undue influence by parties with a vested interest in the outcome of numbering administration and activities. NANC may conduct an evaluation to determine whether a respondent meets the undue influence criterion.

On September 21, 1998, Lockheed Martin announced it was to acquire Comsat. Lockheed Martin then was notified that its acquisition raised neutrality concerns for its number administration /NANPA functions. Specifically, Lockheed Martin was advised that the Comsat Global Telecommunications subsidiary was a telecommunications carrier, the acquisition raised concerns about Lockheed Martin's neutrality and therefore number administration functions had

to be transferred to another, neutral entity. NeuStar was created, and established in a complex venture capital funding arrangement with Warburg Pincus.

3.2 Existing Requirements

The NOWG reviewed relevant documentation in its quest to understand the extent of the current number administration neutrality requirements and the specific modifications requested in NeuStar's petition. The following are a list of the documentation that has been considered:

- Sections of the Code of Federal Regulations
- In the Matter of the request of Lockheed Martin Corporation and Warburg, Pincus & Co. for Review of the Transfer of the Lockheed Martin Communications Industry Services Business, CC Docket No. 92-237 NSD File No. 98-151, Order Adopted: November 12, 1999 (Warburg Order)
- Letters from the NANC to the FCC
- Letters from the FCC to NeuStar

3.2.1 Code of Federal Regulations

The Code of Federal Regulation (CFR) contains specific neutrality requirements that the NANPA and the PA are required to follow. These can be found in:

- 47CFR52.5 Definitions
- 47CFR52.12 North American Numbering Plan Admin and B&C Agent
- 47CFR52.13 North American Numbering Plan Administrator
- 47CFR52.20 Thousands-block number pooling

In particular 47CFR52.12 contains a specific multi-part test and requirement in order for the number administrator(s) to be found to be neutral.

3.2.2. FCC Policies and Orders

The 1999 Warburg Order contains the basis of the additional neutrality conditions established for NeuStar by the FCC. The Order establishes that Lockheed Martin must obtain prior approval before transferring the NANPA functions to another entity (NeuStar). This meant that Lockheed did not have the unilateral authority to select a successor or otherwise "designate" another entity to perform the NANPA functions. The FCC also determined that it must independently evaluate NeuStar's suitability to serve as the NANPA, and also determine whether it meets the requirements stated in its rules and orders in order for NeuStar to assume Lockheed's number administration functions.

The FCC also acknowledged in the Warburg Order that that it would be very difficult, if not impossible, for a NANPA closely associated with a particular segment of the telecommunications industry to be impartial, and that even if such an entity were impartial, there would still likely be the perception and allegations that it was not, as a result of any such an affiliation.

The FCC then applied the three-part neutrality criteria from the 47CFR52.12 to NeuStar to determine if it would satisfy those conditions just as Lockheed met those conditions when it was awarded the original NANPA contract.

> *Criterion One:* The FCC found that NeuStar management and the voting trust, because of their respective 28.1 percent and 59 percent interests in NeuStar, are affiliates of NeuStar. It also found that Warburg, Pincus Equity Partners (WPEP) and its parent Warburg, because they indirectly own 54 percent of NeuStar through their interest in the voting trust in addition to directly owning 9.9 percent of NeuStar, are affiliates of NeuStar. Since neither of these entities, however, is a telecommunications service provider as defined under the Act and FCC rules, the FCC concluded that Criterion One is satisfied.
>
> *Criterion Two:* The FCC determined that, although Warburg is providing most of the operating capital, and thus, those investments will comprise more than 50 percent of NeuStar's revenue, Warburg's investment in NeuStar does not constitute a violation of this criterion because Warburg is not a telecommunications service provider. Moreover, Lockheed's investment in NeuStar is limited to three percent, which falls below the 50 percent threshold in this provision. Because they are not telecommunications service providers, neither NeuStar management, nor the voting trust presents any issues under this criterion, either. Therefore, the FCC found that Criterion Two was satisfied.
>
> *Criterion Three:* The FCC considered CFR52.12(a)(1)(iii) which provides that, notwithstanding the first two neutrality criteria, the FCC may determine that the NANPA may or may not be subject to undue influence by parties with a vested interest in the outcome of numbering administration and activities. The FCC found that Warburg, by virtue of its investments in telecommunications service providers, would have an interest in the outcome of numbering administration and activities. Although there was no indication that any of the telecommunications service providers affiliated with Warburg used numbering resources, each of these affiliates was authorized to provide telecommunications services on a common carrier basis and certain of them were positioned to compete directly with other telecommunications service providers that do use numbering resources. As such, these Warburg affiliates would have an interest in numbering administration issues, and in particular, in obtaining information about how their competitors obtain and use numbers because such information may reveal the marketing strategies of these competitors. Thus the FCC established specific limitations for NeuStar to ensure that Warburg could not unduly influence number administration.

The FCC established several conditions associated with approval of the transfer of the NANPA functions to NeuStar on the organizational structure of NeuStar, the voting trust, and the Board of Directors be maintained during NeuStar's term as the NANPA. Any private agreements made between the parties concerning the transfer must be made consistent with the terms and conditions set forth in this order.

3.2.3. Previous NANC Recommendation

The NANPA's neutrality is critical to the FCC's and industry's need for numbering resources to be administered on a neutral, fair, effective and efficient basis. In its *Third Report and Order,*

the Commission addressed questions that had been raised about Lockheed Martin's neutrality during the evaluation of possible NANP administrators. Although the Commission determined that Lockheed Martin IMS could serve as the NANPA without compromising the purposes of the statute and the resulting neutrality criteria, it stated that if Lockheed Martin Corporation or its affiliates in the future offer common carrier services that are more than *de minimis* in nature, the issue of Lockheed Martin's neutrality and ways to ensure continued neutrality would have to be considered. The Commission also accepted NANC's recommendation that Mitretek Systems serve as the alternate NANPA, to replace Lockheed Martin, if Lockheed Martin defaulted on its obligations as NANPA, or if it is determined that Lockheed Martin had not performed those functions in a satisfactory fashion.

In a letter to the Chief of the FCC's Common Carrier Bureau on August 30, 1999, the NANC responded to a request by Lockheed Martin IMS for expeditious review of the transfer of its Communications Industry Services (CIS) business. In that Notice the Bureau invited the North American Numbering Council (NANC) to provide "a recommendation on whether the proposed business arrangement will fully satisfy the needs of the telecommunications industry for a neutral third party numbering administrator". In a letter dated March 31, 1999 the NANC indicated that it had considered in significant detail the original petition for transfer of the CIS business and concluded that the new organization (which became NeuStar) would not be subject to undue influence by parties with a vested interest in the outcome of numbering administration activities. The NANC concluded that this new proposal was substantially better than a previous proposal and that the business arrangement set forth in the Amended Request fully satisfied the needs of the telecommunications industry for a neutral third party numbering administrator.

3.2.4 Number Administration Procurement

In 2000 the FCC conducted a federal procurement to select a Pooling Administrator (PA). NeuStar was selected as the winning bidder and as such must comply with the terms and conditions established in the procurement and subsequent Federal contract. The Technical Requirements establish the hierarchy of applicable documentation for which the PA vendor must comply or risk the loss of this contract, which includes the CFR, FCC Orders and Industry Guidelines. This contract is for one year and can be renewed annually by the FCC for up to five years.

The FCC conducted a federal procurement in 2003 to designate the next NANPA. A similar technical requirements and procurement process was followed, along with the obligation to adhere to all of the FCC neutrality requirements detailed above.

Number administration federal contracts may need to be reviewed should any of the FCC Neutrality rules be modified in connection with the NeuStar request.

3.3 Publicly Traded Company

NeuStar has indicated in its petition to the FCC that it is contemplating becoming a public company through an Initial Public Offering (IPO). This substantial change in NeuStar's ownership structure would have at least three effects on the FCC's and the NANC's ability to continue to monitor NeuStar's adherence to neutrality requirements:

- It creates more transparency through SEC filings due to sharing of such filings with the FCC and the public generally;
- It adds a new level of incentive to comply with neutrality requirements through legal exposure to claims by public shareholders if fiduciary responsibilities are breached; and,
- It creates additional incentives to comply with neutrality requirements through additional pressure on the value of the company via its publicly held shares if allegations of non-compliance with government regulations are made.

However the FCC should, before eliminating the prior approval requirements related to the transfer of control, require NeuStar to provide additional clarification about the IPO and the transition plan related to the transfer of the voting trust to the shareholders of NeuStar to ensure that no aspects of neutrality are placed in jeopardy. Also NeuStar should be required to maintain provisions in its bylaws and other corporate documents that require it to comply with all neutrality rules. As a publicly traded company, NeuStar should not be allowed to have Warburg's percentage of interest be higher than it is under the current requirements.

The NOWG determined there are no known concerns for number administration regarding the removal of the prior approval requirement for corporate changes that dilute or do not increase the rights of any entity affiliated with a TSP.

3.4 Private Company

If NeuStar remains a private company, neutrality requirements remain consistent with respect to Warburg and any undue influence that may be exercised on number administration. However there were several items that should be considered to alleviate potential neutrality concerns.

They are:

- Warburg's percentage equity should not be increased, whether held directly or through the voting trust, without FCC approval. The current level was deemed satisfactory. Increasing the level has obvious impacts on Warburg's ability to influence NeuStar.

- The FCC should consider providing additional clarification on what ownership interests are permissible for a private corporation who has been designated a number administrator.

- The FCC should consider additional clarification on the existing neutrality requirements placed on NeuStar as a private company and any transfer of the voting trust to the shareholders of NeuStar to ensure that no aspects of neutrality are placed in jeopardy.

- NeuStar should be required to maintain provisions in its bylaws and other corporate documents that require it to comply with the neutrality rules.

- As a private corporation NeuStar should not be allowed to have Warburg's percentage of interest be higher than it is under the current requirements.

Section 4.0 Enforcement Tools

4.1 Audit Requirement

The following existing requirements should be retained:

- NeuStar number administration neutrality audit and quarterly reporting requirements
- Number Administration operational compliance audits
- Federal contract violations as determined by the FCC Procurement Office

Should the number administrators be found to be non-compliant with any or all neutrality requirements, the contract should be terminated and that vendor should be barred from future bidding rounds.

4.2 Penalties

The FCC has the right and authority (and in NOWG's view, the obligation) to terminate the contracts of any of the number administrators should they violate any terms and conditions set forth in their respective Federal contract. The threat of contract termination is probably the single most effective means of ensuring neutrality by the contractor. The FCC should therefore emphasize that it will have little tolerance of neutrality violations and that any violations could have a material adverse consequence for NeuStar's federal numbering administration contracts.

Specifically 47CFR52.12 states the following:

> (e) *Termination.* If the Commission determines at any time that the NANPA or the B&C Agent fails to comply with the neutrality criteria set forth in paragraph (a) of this section or substantially or materially defaults in the performance of its obligations, the Commission shall advise immediately the NANPA or the B&C Agent of said failure or default, request immediate corrective action, and permit the NANPA or B&C Agent reasonable time to correct such failure or default. If the NANPA or B&C Agent is unwilling or unable to take corrective action, the Commission may, in a manner consistent with the requirements of the Administrative Procedure Act and the Communications Act of 1934, as amended, take any action that it deems appropriate, including termination of the NANPA's or B&C Agent's term of administration.

In addition Title V contains specific penalty provisions that may be applied to any number administration neutrality violation.

Specifically:

> Sec. 501 – General Penalty – "Any person who willfully and knowingly does or causes or suffers to be done any act, matter or thing in this Act prohibited or declared to be unlawful, or who willfully and knowingly omits or fails to do any act, matter, or thing in this Act required to be done, or willfully and knowingly causes or suffers such omission or failure, shall upon conviction thereof.... Fine not more than $10,000 or by imprisonment for a term not exceeding one year, or both... " (second violations can mean two years in jail)

4.3 Oversight Controls

The NANC and the FCC should receive all SEC publicly available NeuStar filings within one business day of the SEC filing. Other SEC filings should be furnished to the FCC and the NANC within one business day after the SEC makes it publicly available.

Section 5.0 Summary and Recommendation

The NOWG determined there are no known concerns for number administration regarding the removal of NeuStar's prior approval requirement for a publicly traded company.

However, with respect to a privately held company, the NOWG did determine that the following neutrality safeguards should be reaffirmed by the FCC before granting NeuStar's petition:

- Increase of any interests of a TSP or a TSP affiliate in NeuStar should not be allowed above the current limits that have been established by the FCC.
- Warburg's percentage equity should not be increased, whether held directly or through the voting trust, without FCC approval.
- NeuStar should be required to provide additional clarification on the specifics of the IPO and the transition plan related to the transfer of the voting trust to the shareholders of NeuStar to ensure that no aspects of neutrality are placed in jeopardy.
- If NeuStar remains a private company, neutrality requirements remain consistent with respect to Warburg and any undue influence that may be exercised on number administration.
- The NANC and the FCC should receive all SEC publicly available NeuStar filings within one business day of the SEC filing. Other SEC filings should be furnished to the FCC and the NANC within one business day after the SEC makes it publicly available.
- Number administration federal contracts may need to be reviewed should any of the FCC Neutrality rules be modified in connection with the NeuStar request.

In addition, the FCC should consider providing additional clarification on what ownership interests are permissible for a private corporation who has been designated a number administrator.

The NOWG recommends that the following existing requirements be retained:

- NeuStar number administration neutrality audit and quarterly reporting requirements
- Number Administration operational compliance audits
- Federal contract violations as determined by the FCC Procurement Office

Section 6.0 List of References

1. Request of Lockheed Martin Corporation and Warburg, Pincus & Co., 14 FCC Rcd 19792 (Nov. 17, 1999) ("*Warburg Transfer Order*")

2. Letter from Alan C. Hasselwander, Chairman, North American Numbering Council (NANC) to Lawrence E. Strickling. Chief, Common Carrier Bureau, FCC dated March 31, 1999

3. Letter from Alan C. Hasselwander, Chairman, North American Numbering Council (NANC) to Lawrence E. Strickling. Chief, Common Carrier Bureau dated August 30, 1999

4. Letter from Dorothy Attwood, Chief, Wireline Competition Bureau to Ed Freitag, Esq., NeuStar, Inc., (dated July 12, 2002)

5. 47 C.F.R. § 52.12

6. 47 C.F.R. § 52.13

7. Title V of the Communications Act of 1934 as amended by the Federal Telecommunications Act of 1996

Section 7.0 List of Contributors

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