

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) CC Docket No. 99-200
)
Numbering Resource Optimization)
)

**COMMENTS OF TELCORDIA TECHNOLOGIES, INC ON THE
THOUSANDS-BLOCK POOLING ADMINISTRATOR
TECHNICAL REQUIREMENTS**

Telcordia Technologies, Inc. (“Telcordia”) welcomes the opportunity to submit comments on the Thousands-Block Pooling Administrator Technical Requirements document, on which the Commission has invited comment.¹ Our detailed comments in Attachment 1 seek to address those ambiguities that can be addressed, given the information that has been made available. We believe that Telcordia’s specific recommendations on how details in the Requirements may be perfected are correct and that they should be adopted, but there is a broader concern that is even more important.

Even if Telcordia’s specific perfecting recommendations are adopted, ambiguities will still remain. Any ambiguities in the resulting RFP will create the risks that: (1) bids will arrive that cannot be compared on an even basis, because they interpret the ambiguities differently, and (2) some bidders may interpret the ambiguities in ways that are not desired by the industry and the Commission. If the Commission wishes the full benefits of the bidding competition it is seeking by issuing an RFP, we urge the Commission to resolve the issues we raise.

¹ Public Notice #DA 05-3102, released November 29, 2005 and Erratum released December 5, 2005.

In addition, Telcordia urges the Commission to make available to all prospective bidders an assurance that the current system will transition to the selected vendor, and to provide access to all current system documentation and source code that includes any analysis of compliance of that system with the original Pooling Technical Requirements, and changes to comply with the requirements in Thousands-Block Pooling Administrator Technical Requirements document. This is necessary to help overcome a severely tilted playing field that significantly advantages the incumbent vendor. The incumbent is the only party that understands the extent to which current system complies with the original and instant Technical Requirements.

Moreover, to the extent that an automated interface with the current NANP Administration System (NAS) is required to be developed by the new PA, the Commission must assure that all prospective bidders have the same access to that system, related documentation, and related personnel that the current NAS vendor has either directly or indirectly. It is worth noting that NeuStar was responsible for development of NAS and PAS, and that some of the same personnel were very likely involved with design and development of both systems, providing that vendor with a distinct unfair advantage in responding to that the interfacing requirement unless steps are taken to provide for the full benefits of competition. Such steps could be that NANPA system, documentation and related personnel be made equally available to all vendors prior to their submission of bids, and that any PA submission with regard to an interface to NAS made by NeuStar be made available to all potential bidders in time for inclusion in their submissions. More generally, any references to NeuStar systems, or to FCC systems developed by NeuStar, need to be fully disclosed and carefully bounded to minimize the unfair advantages that NeuStar possesses, and it needs to be made clear that relevant NeuStar documentation will be disclosed to all bidders. Absent this, the bidding process will be fundamentally flawed, and the Commission, the industry, and the public will be denied the benefits of competitive bidding.

In Attachment 1, Telcordia presents detailed comments and recommendations on the Technical Requirements documents, and we urge the Commission to consider them along with the foregoing general comments as it formulates its RFP.²

Respectfully submitted,

TELCORDIA TECHNOLOGIES, INC.

By its attorney:



Michael S. Slomin

Michael S. Slomin, Senior Counsel
Telcordia Technologies
One Telcordia Drive, RRC-5J108
Piscataway, New Jersey 08854
(732) 699-2250

December 29, 2005

² In providing its comments herein, Telcordia does not waive any objections, and specifically reserves the right to object to the resulting RFP and/or bidding by NeuStar, on grounds that may include, but not necessarily be limited to, inadequate notice, unfairness, and inconsistency with the Administrative Procedure and Competition in Contracting Acts.

ATTACHMENT 1: Detailed Telcordia Comments on the Technical Requirements Document

General:

References to Sections outside the Technical Requirements document should each identify the document referenced. For example, Section 2.10.7 of the Technical Requirements document refers to Audit language in Section 1, but there is no such language in Section 1 of the Requirements document, so the reference may be to another document.

References to the Telcordia® LERG™ Routing Guide should show the appropriate trademark. Telcordia is a registered trademark and LERG Routing Guide is a trademark of Telcordia Technologies, Inc. LERG is not an acronym for Local Exchange Routing Guide. In addition, TRA is the Telcordia® Routing Administration not Traffic Routing Administration.

Comments on specific sections of the Technical Requirements Document:

1. Section 1.6.2 states, “The contractor shall be responsible for maintaining the security, reliability, performance, and flexibility of the pooling system. Detailed performance specifications are provided in Appendix B, Reference 2, *Industry Numbering Committee (INC) Thousand Block (NXX-X) Pooling Guidelines*.” However, the INC Thousand Block Pooling Administration Guidelines do not contain specifications of any sort regarding pooling system security, reliability or performance. This requirement needs to be clarified, perhaps by referencing an appropriate attachment for security and specific performance metrics.
2. Section 1.8.1 states, “Existing obligations and agreements related to national numbering policy and administration in a CO (NXX) code environment shall also be applied in a similar manner when administering pooled (NXX-X) resources.” If there are policy directions or obligations that the PA is to observe that are not specifically referenced in the requirements document (or incorporated by reference as an attachment) they each need to be provided to potential bidders.
3. Section 2.1 and Section 2.3.1: Section 2.1 implies that the PA must have operating hours of 8-5 in all time zones (including HI), “The contractor shall be available a minimum of five days a week, eight core business hours (8 AM to 5 PM) a day in all Metropolitan Statistical Areas (MSAs) covered by the NANP where thousands-block number pooling has been implemented,” and Section 2.3.1 states “Staff should be available a minimum of five days a week, eight hours a day for each respective pooling time zone as defined in Section 2.1 of this document. Pooling administration hours of operation shall allow block applicants and block holders in all time zones access during the majority of the client’s core business hours.” These are potentially conflicting requirements that need to be clarified. Note that Section 2.7 of the final NANPA Technical requirements contained language that was clearer than the foregoing language, and should be considered as replacement language.
4. Section 2.2 states, “The contractor shall ensure that the pooling administration organization shall not be impacted by other functions that may be performed by the contractor’s company.” The scope and meaning of this are undefined. Telcordia, for example, is a world class consulting, engineering and telecommunications software development company that performs many different functions. Clarification of the word “functions” as used in this section is necessary for Telcordia to assess and respond to the requirements contained in this

- section. Telcordia also notes that language similar to this was not in the final NANPA technical requirements, and thus can be removed.
5. Section 2.3.7 states, “Staff members of the contractor may not represent the interests of the contractor’s parent company in any respect. For guidance, see Appendix B, Reference 1, *FCC 00-104*, paragraph 154 and the conflicts provisions in Section H.” The clause “...not represent the interests of the contractor's company in any respect” is confusing, and the referenced paragraph of FCC 00-104 does not provide guidance on the relationship of numbering administration staff members and the company that they work for. Telcordia notes that language similar to this was not in the final NANPA technical requirements, and it thus can be removed. If there are to be new limitations on interactions by PA staff members and the company that they work for, Telcordia recommends that such limitations be specified. Alternatively, the requirement could be written to say that the contractor shall provide the PA via an organization structure that meets the FCC neutrality requirements.
 6. Section 2.5.4 states, “The NANC shall be consulted at the FCC’s discretion regarding the suggested implementation date to determine the likely impact on service provider processes and systems (i.e., whether it would be unduly burdensome or would unfairly disadvantage any service provider or group of service providers per the PA’s obligations and NANP administrative principles).” Telcordia notes that vendors and SPs not directly represented at NANC should be provided the opportunity to provide input on changes that affect Operation Support Systems (OSSs). The current lack of provisions for this, because vendors are not permitted to participate in the NANC’s Numbering Oversight Working Group, is a significant weakness in the cooperative industrywide processes for resolving numbering issues that can and should be corrected. The Commission should add a specific requirement that requires the PA seek input on implementation dates from SP’s with PAS logins, and vendors that have interfaces with PAS prior to setting such an implementation date.
 7. Section 2.6 and 2.7 seem to be missing.
 8. Section 2.10.3 states, “The contractor may encounter a service provider, the LERG or the NANPA/NPAC that is not in compliance with FCC rules or orders or industry guidelines.” The Telcordia® LERG™ Routing Guide is an output product of an underlying database, the Telcordia® Business Integrated Routing and Rating Database System (BIRRDs) and the data provided via the product is input by service providers or their representatives known as AOCNs, and is not the subject of NANC or FCC regulation. The LERG Routing Guide should be removed from this list of entities being examined for compliance.
 9. Section 2.10.7 references “other audit requirements” in Section 1, there are no “other audit requirements” in Section 1 of the Technical Requirements document. Thus, this reference should be clarified or removed.
 10. Section 2.14.1 requires the contractor to forecast the pool inventory level and maintain an inventory of no more than 6-months of blocks based on aggregated NRUF demand. However, NRUF forecast data is not detailed enough to permit the PA to maintain a rolling 6-month inventory pool in each rate center area. The NRUF collects forecast data twice yearly on an annualized basis; in other words reporting carriers report how many blocks in a particular year they forecast need for in a rate center. Without knowing at least in which six month period blocks will be needed, the PA cannot on the basis of the NRUF data maintain a six month pool inventory. Further, without knowing which month the blocks are forecast to be needed, the PA will be unable to maintain a rolling or smooth 6-month inventory of blocks in a rate area. For this reason, the INC has the PA use the Pooling Forecast Report as outlined in the INC Thousand Block (NXX-X) Pooling Administration Guidelines, Section 6.

The Pooling Forecast Report Form (Appendix 1 of the Guidelines) collects forecast information concurrent with NRUF submissions at monthly intervals allowing the PA to maintain a rolling 6-month inventory. It is also worth noting that Section 2.14.1 requires the PA to maintain no more than a sixth month inventory and Section 2.17 calls for the PA to maintain a six-month inventory. These together call for a very fine balancing act by the PA, and thus require relatively detailed forecast information. Thus, Section 2.14.1 and Section 2.17 should either be modified to reflect the current process or made contingent on modification of the NRUF form to allow for the PA to fulfill this requirement using NRUF.

11. Section 2.16.7 As noted above, references to Telcordia products should be corrected. In addition, Telcordia notes that there is no cost to the PA for entering block assignment data into BIRRDS. The PA enters this data into BIRRDS so that only the PA assigned OCN via its AOCN may provision routing and rating data for that block in BIRRDS. This interface is provided via a RUMBA dial-up session or via a Graphical User Interface (GUI) web access. The only cost to the PA is for its call to the modem pool, and then only if it chooses to use dial up access.
12. Section 2.20.1 The requirement for an interface between PAS and NAS is unclear. The Technical Requirements in this section state that the interface shall be the same as it is for service providers, but there are multiple interfaces between service providers and PAS or NAS today including Fax, E-mail, GUI and EFT interfaces. If this requirement is intended to have the PA augment the current PAS system to interface automatically with NAS, as seems to be the case per Section 3.1.5, then this should be clarified.
13. Section 2.20.3 The section refers potential vendors to the NANC NPAC Function Requirements Specifications; however, that document does not describe the interface between the PA and NPAC. Either those sections of the NPAC Methods and Procedures document which detail such interactions should be made available to bidders, or further description of that interface should be provided in the technical requirements document.
14. Section 2.20.4 Figure 2 shows an interface from the PA to a “LERG-TRA Assignee/SP” that is separate from the Service Provider on the left side of the figure and that has interfaces to the NPAC and to the Telcordia BIRRDS. This interface is unclear. If it is a SP’s AOCN or NPAC Service Bureau personnel, that should not be shown as separate from the Service Provider from a PA interface point of view since the data entry is performed by the SP personnel or by their representative, an AOCN.
15. Section 3.1 states that the PA will build and maintain a pooling system. If, as expected and implied by the original requirements and solicitation materials, the current Pooling System and hardware will be provided to the selected vendor, then this language should be revised to require or permit enhancements and maintenance to the current system as a way of potentially satisfying the build/maintain requirement. In addition, to the extent that use of the current hardware and software is permitted or expected, all prospective vendors should be given reasonable access to that system, code, and documentation to assess the enhancements needed to meet the requirements of the instant Technical Requirements document. In addition, as noted in the Comments above, any assessment of how that system met the original requirements (or fell short of doing so) should be provided to all potential bidders.
16. Section 3.1.3 states that “The contractor shall support legacy data filing protocols between service providers and the NANPA.” Telcordia understands that the FCC and the industry would want to maintain the previous data filing protocols but would expect that the protocols required to be maintained were those employed between the old PA and the SPs, and not necessarily those employed between NANPA and the SPs. The requirement as written

implies that the protocols used with NANPA should replace those currently used by SPs to interface with the PA. Telcordia suggests replacing NANPA with PA in this sentence.

17. Section 3.1.5 states, “The contractor will work with the NANPA to establish within six months from the beginning of the term of this contract, a functional mechanized interface between the two administration systems, PAS & CAS, that allows for the passing of information between the two administration systems and where appropriate, from SPs to the NANPA via the PA administration system and visa versa.” First, this section should be amended to replace CAS (the former NANPA system) with NAS (the current NANPA system). Second, the type of interface to be provided should be more specifically stated; “a functional mechanize[d] interface” is ambiguous. If the FCC and the industry require a way to enter NXX applications in pooling areas into PAS via the GUI or EFT for forwarding to NANPA via EFT, then that is what should be stated. If a different method of interfacing is required, then that should be specified. In any case, it is worth noting that this interface may rely on development by the current NAS vendor. Cooperation of that vendor should be required. In addition, the NANPA and its parent company should be required to provide the same support at the same costs, including design support, to prospective bidders as it does to itself as the current PA and prospective bidder. Specifically, if NeuStar personnel who work for NANPA or worked on the development of NAS work on designing an interface between NAS and PAS, that design must be provided to all prospective bidders in advance. The Commission can easily provide for this, since the NAS and PAS belong to the FCC according to the original Solicitation materials of both systems.
18. Appendix B: References should be updated to reflect the latest versions of the documents before the solicitation is issued, and copies of all referenced documents should be made available to all prospective bidders. Electronic copies are preferred. Telcordia notes that the versions listed for the INC documents and the NANC NPAC Functional Requirements Specification are outdated, and that it was Telcordia’s experience in the last procurement that it had significant difficulty obtaining referenced NPAC Methods & Procedures document in a timely fashion.