

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

**COMMENTS OF NEUSTAR, INC.
AS THE THOUSANDS BLOCK POOLING ADMINISTRATOR**

Neustar, Inc. (Neustar), as the national Thousands Block Pooling Administrator (PA), submits the following comments regarding the proposed Thousands-Block Pooling Administrator Technical Requirements (technical requirements document or TRD), in response to the Federal Communications Commission (Commission) Wireline Competition Bureau’s (Bureau) Public Notice dated May 3, 2012.¹ The public notice seeks comments on the proposed technical requirements for the upcoming rebid of the contract for the PA in the above-captioned proceeding. The Bureau requests comments on the technical requirements as changed and recommended by the NANC and accepted by the Bureau.

In these comments, Neustar, as the PA, addresses certain language in the TRD that, in its opinion, is appropriate for addition, clarification, or deletion.

1. Replenishment of the Pool Inventory

Section 2.18 of the technical requirement document, entitled *Replenishment of the Pool Inventory*, addresses the contractor’s responsibilities regarding “monitoring each rate

¹ *Wireline Competition Bureau Seeks Comment On Technical Requirements for Thousands-Block Number Pooling Administrator*, Public Notice, CC Docket No. 99-200, DA 12-705 (rel. May 3, 2012) (Public Notice).

area pool and facilitating the maintenance of no more than a six-month supply of assignable thousands-blocks (industry level inventory) in each rate area pool.”² The PA respectfully suggests that an outdated portion of the requirements for pool replenishment in Section 2.18 be eliminated, because the pool replenishment process has been automated in the Pooling Administration System (PAS) since 2008.

The TRD directs that:

The contractor’s efforts will include – but not be limited to:

- Send emails to SPs in the affected rate area pool and request voluntary donations
- Check with SPs who have a forecast on file for the affected rate area to see if one is qualified to become a LERG Assignee – provided the aggregated demand for blocks in the pool meets the MTE/utilization requirements.³

The process for pool replenishment reflected in these bullets was standard procedure for the PA prior to 2008. At that time the PA fully automated pool replenishment in PAS, thereby eliminating the need for the manual efforts required by sending emails and checking service providers who have a forecast on file.

The issue of pool replenishment through emails and telephone calls was discussed during the Numbering Oversight Working Group’s (NOWG) 2006 Operational Review of the PA. At the request of the NOWG, the PA brought an issue to INC (Issue 519) to address and streamline the pool replenishment process. INC modified the Thousands-Block Pooling Administration Guidelines (TBPAG) to allow an automated split block/code request in which a user is able to fill part of a block request with the blocks currently available, and fill the other part of the request by opening a full CO code for pool replenishment in areas where

² Technical Requirements Document, § 2.18.

³ *Id.*

pool replenishment is needed. This process was implemented in PAS on May 16, 2008, and replaced the process described in the above-quoted language from the TRD.

2. **Modification of Guidelines**

Four new bullet points have been added to Section 2.5.4 of the proposed TRD, entitled *Modification of Guidelines*. These bullet points stand as requirements for the PA but appear to have no bearing on PA conduct in the event the guidelines are modified. They direct the contractor to, among other things:

- Accept, process, and verify the accuracy of applications for blocks in accordance with regulatory requirements and industry guidelines
- Contact code applicant as necessary to gain clarification or additional information in order to process the application when first submitted.
- Review entire application, identifying all errors and omissions when first submitted.
- Provide information or location of tools and contacts to assist applicants in properly completing applications for new numbering resources, changes and disconnects.⁴

The directory language of the bullets appears to be more appropriate for application processing, and can also be found in Section 2.16, entitled *Block Assignments*. The PA respectfully requests that the bullet points either be removed from Section 2.5.4, or that the FCC provide clarification on how to implement these requirements in relation to guideline modifications.

3. **Automation of Additional Forms**

Section 3.1.3 of the TRD, entitled *Automated Data Filing Capabilities*, reads in part as follows:

⁴ *Id.* at § 2.5.4.

This automated capability shall permit service providers to forward pooled application data for the following forms from Appendix B:

Reference 2, *INC TBPAG*.

- Attachment 1 Part 1A General Application Information
- Attachment 2 Part 1B NPAC Block Holder Data
- Attachment 2a Part 2a Form 1 Thousands-Block (NXX-X) Assignment Request
- Attachment 3 Part 3 Pooling Administrator's Response/Confirmation
- Attachment 4 Part 4 Confirmation of NXX-X Block In Service
- Attachment 5 Part 5 Thousands-Block Reclamation Form
- Appendix 1 Thousands-Block Forecast Report
- Appendix 2 Thousands-Block Donation Form
- Appendix 3 Thousands-Block Months to Exhaust and Utilization Certification Worksheet - TN Level
- Appendix 4 Thousands-Block Months to Exhaust Certification Worksheet - 1000 Block Level
- Appendix 5 User Profile Application
- Appendix 6 Example of Pre-Planning Checklist with Required Fields Identified for Demonstration of Facilities Readiness for an Initial Block Request⁵

Two of these forms, Attachment 2a and Appendix 6,⁶ are new to this TRD, and do not currently reside in PAS. Adding them will require changes to both the TBPAG and the system.

Attachment 2a, the *Part 2a* Form, is not presently a form that is handled by the PA. It is sent by the service provider (SP) to its Administrative Operating Company Number (AOCN) provider with the information required for the AOCN provider to enter block-related data into Telcordia Technologies' Business Integrated Rating and Routing Database

⁵ *Id.* at §3.1.3.

⁶ The information from Appendix 5, the User Profile Application, along with additional fields relating to additional parties to be copied on system responses, is already incorporated into PAS.

System /Local Exchange Routing Guide (BIRRD/LERG).⁷ Implementation of this change would necessitate:

1. modifications to the TBPAG to require SPs to provide this form to the PA,
2. system changes to store the forms and make them available, and
3. acquisition and maintenance of AOCN contact information, which is not done now.

As background, Appendix 6 is one of five acceptable documents establishing facilities readiness referenced in the TBPAG Section 4.3.1.2. The Guidelines presently direct an applicant to email or fax any one of the identified proofs of facilities readiness to the PA. The other four possible documents are:

- 1) A current executed interconnection agreement between a Local Exchange Carrier and the service provider requesting numbering resources.
- 2) Documentation of the state commission approval of the current interconnection agreement.
- 3) A confirmation letter or letter of intent provided by the LEC with which the requesting SP will interconnect.
- 4) A letter from the requesting SP identifying a block/code in service in another rate center that already uses the same facilities and CLLI code that will be used to serve the new rate center where the initial block/code is being requested and reflected on the application.

Automation of Appendix 6, *Example of Pre-Planning Checklist with Required Fields Identified for Demonstration of Facilities Readiness for an Initial Block Request*, would require changes not only to PAS, but also to the NAS/PAS interface (to allow forwarding through the interface), and to the NANP Administration System (NAS) which would also have to accept and store the form.

⁷ The LERG and BIRRD/LERG are registered trademarks of Telcordia Technologies.

Further, automation of this document will affect PA processes, in that pooling administrators may not automatically receive all supporting documentation in an emailed or faxed package as they do now. If the documentation supporting an initial block application does not contain proof of facilities readiness, the recipient pooling administrator will have to go into PAS to ascertain whether Appendix 6 has been submitted separately. In addition, if subsequent review or auditing is required, the reviewer will have to check in two different places to assure that the documentation is complete, because faxed or emailed documents are archived. While this is obviously not a huge burden, it tends toward complicating rather than streamlining the application, auditing, and archiving processes. The PA respectfully suggests that the *Part 2a* and Exhibit 6 be removed from automation requirements.

4. Holidays

Section 2.1.3 of the TRD reads as follows:

The contractor shall observe U.S. holidays. The following is a list of holidays that the contractor shall observe:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day after Thanksgiving*
- Christmas Day

*Not open for business, but the Help Desk shall be open and this shall be considered a business day for day counts on processing. Contractor shall be open for business on all other business days.

On an annual basis, the contractor shall post a list of the holidays observed and the calendar dates of those holidays on the PA web site.⁸

⁸ Technical Requirements Document, § 2.1.3.

There is significant application processing interaction between the PA and the North American Numbering Plan Administrator (NANPA) and the guidelines for both administrators require processing of applications within 7 calendar days. Therefore, the observed holidays for the PA and the NANPA should be consistent. On page 7 of the NANPA Statement of Work (SOW), the NANPA holidays are outlined as follows:

HOLIDAYS: A minimum of ten paid holidays per year, New Year's Day, Martin Luther King Jr.'s Birthday, Washington's Birthday, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day, and Christmas Day....⁹

Further, a NANPA holiday schedule is outlined in Section 2.7.3, *Holidays*:

The NANPA shall observe Federal holidays as set forth in the SOW and may observe State holidays. The NANPA may close the day after Thanksgiving, provided the Help Desk remains open (and shall be considered a business day for day counts on processing)¹⁰

The PA respectfully requests that the PA holiday schedule in Section 2.1.3 of the TRD be changed to match the NANPA holiday schedule.

5. Conclusion

In conclusion, Neustar, Inc., as the existing national thousands-block pooling administrator, respectfully requests that the Commission:

1. Eliminate the manual process requirements for pool replenishment in Section 2.18 because that process has been automated since 2008;

⁹ Sol. #FCC12R0007, p. 7.

¹⁰ Sol. #FCC12R0007, Attachment A, Technical Requirements Document, § 2.7.3.

2. Clarify how the specified bulleted requirements in Section 2.5.4 relate to guideline modifications, or delete them, since they appear verbatim elsewhere in the document;
3. Delete the *Part 2a* and Exhibit 6 forms from automation requirements in Section 3.1.3; and
4. Conform the PA holiday schedule to the NANPA holiday schedule.

Respectfully submitted,

/s/_____

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