

May 2, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., SW, TW-A325
Washington, DC 20554

Dear Ms. Dortch:

**Re: CC Docket No. 92-237
North American Numbering Plan Administration
Contribution Factor and Fund Size for July 2014 through June 2015**

In accordance with 47 CFR § 52.16 (a), attached is the re-submission of the contribution factor and fund size for July 2014 through June 2015 as prepared by Welch LLP as Billing & Collection Agent. The NANC has approved this submission.

In order to meet the NANPA's requirement to issue the billings to the carriers by June 12th, we ask that the FCC expedite the approval of the contribution factor.

In accordance with the Commission's rules, a copy of this report has been filed electronically in the above-referenced docket.

Yours very truly,

WELCH LLP

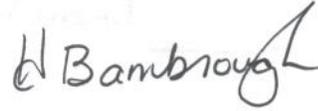


Faith Marcotte, CA
Partner

Attachments
(Service List and Quarterly Report)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing filing was served this 2nd day of May, 2014 by electronic delivery or by electronic mail, to the persons listed below.



Heather Bambrough

The following parties were served:

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* Filed via ECFS (Electronic Comment Filing System PDF)

** Electronic mail

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)
)
Administration of the North)
American Numbering Plan)

CC Docket No. 92-237

**North American Numbering Plan Administration
Contribution Factor and Fund Size
For July 2014 through June 2015**

I. Background of the Plan

The North American Numbering Plan (NANP) is a numbering scheme for the public switched telecommunications networks (PSTN) within the United States, Canada and the participating Caribbean countries. The NANP Fund was established to cover the costs of the NANP which include the costs of the administrator for the numbering plan and central code administration and other administration costs of the Plan. NANP is funded by United States telecommunication service providers, and from Canada and Caribbean member countries.

II. NANP Billing & Collection Agent

On April 12, 2004 the Federal Communications Commission (FCC) announced that Welch LLP would serve as the NANP Billing & Collection Agent (NANP B&C Agent) for a five year contract term effective October 1, 2004. According to Article 52.16 of Title 47 of the Code of Federal Regulations (CFR), the NANP Billing & Collection Agent is responsible for the collection of funds from United States telecommunication service providers and NANP member countries and for the disbursement of funds to support the numbering functions for telecommunication services. One function of the NANP B&C Agent is to determine the funds required for the operation of the Plan for each funding period and to propose a contribution factor for the United States domestic carriers.

III. Budget and Contribution Factor

Budget

The budget for the Plan for the upcoming year is set out in Exhibit 1. The total of the costs for the 2014/15 funding year is \$7,165,926 which includes a contingency allowance of \$1,000,000. A detailed discussion as to the determination of the costs can be found under the heading “Anticipated Disbursements”. The International Members contribute \$124,399 towards these costs (see detailed discussion on this point under the heading “Contribution Factor Components – International Members”). The balance of the costs of \$7,041,527 can be funded either by a draw down of the accumulated surplus in the Fund or by an assessment funded by the domestic telecommunication carriers or by a combination thereof.

Contribution Factor for 2014/15

Welch LLP supports the recommendation of the North American Numbering Council (NANC) related to the method to assess the domestic telecommunication carriers for 2014/15. The budget and contribution factors based on a range of revenue estimates as recommended by the Billing & Collection Working Group was presented to the members of NANC at the NANC meeting on March 27, 2014 for comment and approval. No objection was brought forward and the recommendation was approved. The first part of the recommendation is that the anticipated surplus of \$319,672 (as at June 30, 2014) be used to offset the balance otherwise required to be collected from the domestic telecommunication carriers. This leaves a balance of \$5,721,855 to be recovered through the assessment. The second part of the recommendation is that a contribution factor in the range from 0.0000354 to 0.0000365 be used for the 2014/15 funding year (July 2014 – June 2015) to cover this remaining balance. The preliminary revenue figures reported on the 2014 Form 499A indicate that the revenue assumption is valid for the lower end of the range. Consequently, the contribution factor of 0.0000365 as approved by NANC is recommended for 2014/15 funding year. The minimum funding requirement of \$25 per carrier will remain.

The proposed contribution factor is higher than last year (2013/14 – 0.0000302).

IV. Contribution Factor Components

Domestic Telecommunication Service Providers

The domestic carriers are required to fund the numbering administration costs (in excess of funding received from the International members), the CO code administration, the thousand-block pooling administration, carrier audits and the costs of administering the Plan itself. As per 47 CFR § 52.17 all domestic telecommunications carriers are required to fund NANP on a

competitively neutral basis. The contribution base that is used to determine the carrier's Plan requirement is based only on billed end-user telecommunication revenues as reported on the Form 499A. The revenue base is determined by the following formula using information from the specific lines on the Form 499A: Line 420A + Line 412 – Line 511A.

The revenue numbers used by the NANP B&C Agent to calculate the individual fees are obtained from the data collection agent, Universal Service Administrative Company (USAC). USAC collects the data from the Form 499A prepared by the telecommunication service providers and distributes the necessary information to NANP B&C Agent on a monthly basis to allow the B&C agent to perform its functions.

International Members

Canada and the Caribbean countries contribute to the funding of the numbering plan administration function, but not the central office (CO) code administration, as these countries perform their own CO code administration. The Canadian and Caribbean countries share of the numbering administration costs is based on the country's total population in relation to the total population of the United States, Canada and the participating Caribbean countries. This ratio is further reduced by the percentage of numbering plan administration work performed by the member country itself. Canada performs 25% of the numbering administration itself and the Caribbean countries perform 66.6% of the work themselves. The contribution required for the 2014/15 funding year by Canada and the Caribbean countries is \$102,967 and \$21,432 respectively.

V. Anticipated Disbursements

Numbering Administration and 1K Block Pooling

NeuStar, Inc. administers the numbering plan and central codes administration as well as the 1K Block Pooling. The NANP administration contract was issued on July 8, 2012. The cost of numbering administration is provided for in the budget as per the contract. Any additional work to be performed by NeuStar, Inc. for numbering administration is to be covered by the contingency allowance.

The 1K Block Pooling contract is a fixed price contract with NeuStar, Inc. which is for 4 years commencing on July 15, 2013 to July 14, 2017. The cost for the 1K Block Pooling is provided for in the budget as per the contract. Any additional work to be performed for 1K Pooling is to be covered by the contingency allowance. As part of the contract award, there was an additional cost for automated systems development in the amount of \$1,337,281. This cost was allocated

over the period from July 2013 to December 2014. The amount provided for in the budget is the remaining balance to be paid.

Other Plan Costs

The budget has allowed for carrier audits to be performed by the FCC during the funding year at a total cost of \$300,000.

The contract for the Billing & Collection Agent expired September 30, 2009. At the time that this budget was prepared, the FCC had not issued an RFP for this contract. The cost of billing and collection is provided for in the budget as per the interim contract.

The cost of the Data Collection Agent has been provided for based on the USAC's estimate of NANP's share of the cost of the data collection. The Plan is charged 8% of the monthly cost that the Data Collection Agent incurs with respect to collection of data from the Form 499A.

The cost of the operational audit of the Plan has been included in the budget based on an estimate.

Bank fees are an expense of the Fund. An estimate of the fees is provided based on prior years' history of bank fees.

Bad debts are an estimate of uncollectible accounts. This amount is based on prior history.

The costs have been reduced by the estimated interest income received on the funds held in the collateralized savings account and overdue accounts, and the late filing fees collected from carriers who file their Form 499A late.

The contingency allowance is to provide for additional costs either not included in the budget or additional costs due to change in scope of work as mandated by the FCC. The contingency allowance has been provided for at \$1,000,000.

**NANPA FUND BUDGET AND CONTRIBUTION FACTOR
July 2014 to June 2015**

Projected Disbursements

NANPA Administration	
NANPA Administration (69% per NeuStar)	\$ 1,472,838
NANPA CO Code Administration (31% per NeuStar)	<u>661,710</u>
Total NANPA Administration	<u>2,134,548</u>
Less NANPA Administration costs funded by International Participants	
Canada	102,967
Caribbean countries	<u>21,432</u>
Total Contributions by International Participants	<u>124,399</u>
Net total NANPA Administration Costs	2,010,149
1K Block Pooling Administration	2,862,065
1K Block Pooling Administration – Automated systems development	437,281
Carrier Audits	300,000
Billing & Collections Agent	340,032
Data Collection Agent	58,000
Annual Operations Audit	44,000
Bank fees	47,000
Bad debts	40,000
Interest income	(7,000)
Fee for filing Form 499A late	<u>(90,000)</u>
Total projected disbursements for July 2014 to June 2015	6,041,527
Desired contingency provision	<u>1,000,000</u>
Balance to be funded through reduction in surplus and US carrier contributions	7,041,527
Portion of projected surplus to be used for 2013/14 year	<u>(319,672)</u>
Net US Carrier Contribution requirement	<u>\$ 5,721,855</u>
Contribution Factor	<u>0.0000365</u>