

State of Florida



Public Service Commission

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RECORDS AND REPORTING

DATE: FEBRUARY 17, 2000

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF COMMUNICATIONS (ILERI^{ji}, CUTTING^{fcc})
DIVISION OF LEGAL SERVICES (CALDWELL) ^{TK for DMC}

RE: DOCKET NO. 981444-TP - NUMBER UTILIZATION STUDY:
INVESTIGATION INTO NUMBER CONSERVATION MEASURES.

AGENDA: 2/29/2000 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: 5/1/2000 - IMPLEMENTATION OF THE FIRST THOUSAND-
BLOCK POOLING TRIAL

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\LEG\WP\981444.RCM

DOCUMENT NUMBER-DATE

02127 FEB 17 8

FPSC-RECORDS/REPORTING

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CASE BACKGROUND

On December 17, 1998, the Florida Public Service Commission (Commission) provided its opinions regarding the implementation of number conservation measures by filing comments with the Federal Communications Commission (FCC) in NSD File No. L-98-134-North American Numbering Council Report Concerning Telephone Number Pooling and Other Optimization Measures. The Commission recommended that numbering resource optimization measures be implemented on a state-by-state basis, rather than nationwide. The Commission also recommended that a portion of the unused telephone numbers within a given provider's NXX¹ code be assigned to other provider(s) operating in the same area. The Commission further stated that audits are important to ensure compliance with numbering guidelines and to prevent premature area code exhaustion. The Commission stated that greater attention should be placed on accurate data collection in order to correctly evaluate number utilization and to better estimate the exhaustion of NPAs.²

As part of its ongoing effort to conserve area codes, on April 2, 1999, the Commission filed a petition with the FCC seeking authority to implement number conservation measures, which would help minimize consumer confusion and expenses associated with imposing new area codes too frequently.

On April 12, 1999, Senator Susan Collins introduced legislation in Congress (Senate Bill 765) based on a concern about the current inefficient allocation of telephone numbers. This legislation would require the FCC to develop a plan for the efficient allocation of telephone numbers by December 31, 2000. On July 1, 1999, Representative Dennis J. Kucinich filed a companion bill. The Commission supported these bills in their entirety.

On September 15, 1999, the FCC issued an Order (FCC 99-249) granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures.³ (See

¹NXX is defined as the first three digits of a telephone number or the prefix. N can take any integer digit from 2 to 9, and X can take any integer digit from 0 to 9.

²NPA(s) stands for Number Plan Area(s) or area code(s).

³Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, NSF File No. L-99-23 (rel. September 15, 1999)

Attachment A) In its Order, the FCC granted the Commission interim authority to:

- (1) Institute thousand-block pooling (1KNP) by all LNP⁴-capable carriers in Florida;
- (2) Reclaim unused and reserved NXX codes;
- (3) Maintain rationing procedures for six months following area code relief;
- (4) Set numbering allocation standards;
- (5) Request number utilization data from all carriers;
- (6) Implement NXX code sharing; and
- (7) Implement rate center consolidation.

On October 20, 1999, a staff workshop was held to discuss these measures. A Florida Numbering Steering Committee was formed to address numbering issues. This committee created five working groups: 1KNP, short term efficiency measures, code sharing, rate center consolidation, and legal issues. Staff has been actively participating in every working group.

However, there is a chaotic pattern of area code exhaust in Florida which is increasingly alarming. Staff also notes that almost half of Florida's area codes are in extraordinary jeopardy. Customers are complaining about new area codes. Many are confused because of overlays and new dialing patterns. Many are misdialing area codes. In the overlay areas, many dial the wrong area code or forget to dial the area code. Staff believes that an immediate decision must be made by this Commission.

This recommendation addresses issues related to exercising the federal authority to conserve telephone numbers and delay the early exhaustion of area codes in Florida. Therefore, staff brings this very important recommendation before the Commission in order to address number conservation measures that need to be implemented in Florida immediately.

⁴LNP (Local Number Portability) is a service that provides residential and business telephone customers with the ability to retain, at the same location, their existing local telephone numbers when switching from one local telephone service provider to another.

ISSUE 1: Should the Commission order the immediate return of all unused and reserved NXX codes by all carriers in the 954, 561, and 904 area codes?

RECOMMENDATION: Yes. Staff recommends that the Commission order the immediate return of all unused and reserved NXX codes by all carriers in the 954, 561, and 904 area codes based on Industry Numbering Committee's Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008). Staff also recommends that the Commission direct the North American Numbering Plan Administrator (NANPA) to provide monthly Local Exchange Routing Guide (LERG) reports by area code, including the code assignment and activation dates, to the Commission. Staff further recommends that after the Commission staff evaluates the reports, staff should contact NANPA to reclaim unused and reserved NXXs in all of Florida NPAs from all carriers who have not met the applicable INC 95-0407-008 guidelines as presented in the staff analysis. (ILERI)

STAFF ANALYSIS: In the FCC's Florida Order (FCC 99-249, ¶ 22), the FCC responded to the Commission's request for additional delegation of authority to reclaim unused NXX codes by stating:

Reclaiming NXX codes that are not in use may serve to prolong the life of an area code, because these codes are added to the total inventory of assignable NXX codes in the area code. Therefore, we grant authority to the Florida Commission to investigate whether code holders have activated NXXs assigned to them within the time frames specified in the CO Code Assignment Guidelines, and to direct the NANPA to reclaim NXXs that the Florida Commission determines have not been activated in a timely manner. This authority necessarily implies that the Florida Commission may request proof from all code holders that NXX codes have been "placed in service" according to the CO Code Assignment Guidelines.⁵ We further direct the NANPA to abide by the Florida Commission's determination to reclaim an NXX code if the Florida Commission is satisfied that the code holder has not activated the code within the time specified by the CO Code Assignment Guidelines.

⁵Under the CO Code Assignment Guidelines, carriers are obligated to submit to the NANPA within six months of the requested effective date of newly obtained NXX codes a Part 4 certification that the code has been placed in service. See CO Code Assignment Guidelines NXX Assignment Request Form, Part 4.

Staff recognizes the importance of reclaiming unused and reserved NXXs to prolong the life of an existing area code. In this Order, the FCC granted the Commission authority to investigate whether code holders have activated NXX codes assigned to them within the time frames specified in the Central Office Code Assignment Guidelines developed by the INC.

These guidelines (INC 95-0407-008, dated January 2000) also explain how the numbering administrator would reclaim the unused NXX codes. According to these guidelines, the code holder would return the NXX codes to the administrator if (1) it is no longer needed by the entity for the purpose for which it was certified and assigned, (2) the service it was assigned for is disconnected, or (3) the CO Code(s) was(were) not activated within the time frame specified in these guidelines; however, the code holder may request an extension of the activation time commitment.

Section 8.2.3 of the INC guidelines indicates that code holders must activate the NXX code(s) within six months. If the code is not placed in service, and the code administrator finds a legitimate reason for the code not being in service, then the code administrator may extend the date to activate the code by up to three months. Therefore, in the worst scenario, it takes nine months to activate an NXX code. Staff finds this time excessive in that an area code or area codes might go into jeopardy if all code holders act in a similar fashion.

Staff believes that the reclamation of NXXs from all code holders would extend the lives of area codes in Florida. Recently, in this docket, staff conducted a major number utilization study of all code holders in Florida, to assess the way telephone numbers are used. A part of this analysis indicated that the life of the majority of area codes in Florida could be extended using NXX reclamation. The FCC understands that reclamation can play a critical role point and acknowledges this very clearly in every order it established for other state commissions.

The chart below provides the number of available NXXs with no contamination in the NPAs that staff recommends be approved for 1KNP:

Area Code	Number of Available NXXs with Zero Contamination
561	33
904	17
954	18

If the NXXs indicated above are reclaimed, staff estimates that the life of these NPAs would be extended as follows:

Area Code	Current Exhaust Date	Extended Exhaust Date
561	October, 2002	April, 2003
904	April, 2002	July, 2002
954	July, 2002	October, 2002

Staff notes that the above estimates for the 954, 561, and 904 area codes, which are currently in extraordinary jeopardy, are based on the assumption that the current rationing procedures are maintained.

Staff has contacted NANPA to find out when the NXX codes were activated. Staff was informed that NANPA did not keep such records once the NXX codes are activated. Based on this, staff would not be able to determine if the NXX codes have been activated in a timely manner. Therefore, NANPA should have the responsibility to determine activation dates using LERG.

Staff believes that Florida should exercise this authority in its entirety. Therefore, staff recommends that the Commission order the immediate return of all unused and reserved NXX codes by all carriers in the 954, 561, and 904 area codes based on Industry Numbering Committee's Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008). Staff also recommends that the Commission direct the NANPA to provide monthly LERG reports by area code, including the code assignment and activation dates, to the Commission. Staff further recommends that after the Commission staff evaluates the reports, staff should contact NANPA to reclaim unused and reserved NXXs in all of Florida NPAs from all carriers who have not met the applicable INC 95-0407-008 guidelines as presented above.

ISSUE 2: Should the Commission order the mandatory implementation of 1KNP for wireline carriers in the 954, 561, and 904 area codes, and if so, what should be the backup plan to provide relief in these area codes?

RECOMMENDATION: Yes. Based on the 1KNP committee's decision made on February 4, 2000, staff recommends that on an interim basis the Commission order the mandatory implementation of 1KNP for all LNP-capable carriers in the 954, 561, and 904 area codes. Staff also recommends that one of the alternatives proposed for the 954, 561, and 904 area code dockets be used as a backup plan to provide relief, pending completion of the evidentiary proceeding in Docket Nos. 990457-TL (Area Code 954), 990456-TL (Area Code 561), and 990517-TL (Area Code 904). (ILERI)

STAFF ANALYSIS: LNP was initially mandated by Congress to promote local competition. However, once the LNP infrastructure is in place, it can be used to increase the efficiency by which carriers utilize telephone numbers. Specifically, the LNP platform can be used to support "number pooling."

Pooling enables telephone numbers to be allocated to carriers in smaller, more efficient, portions. Thousand-block number pooling allows 10 different carriers to utilize numbering resources from one NXX. When coupled with reclamation, 1KNP may significantly reduce the extent to which numbering resources are "stranded" in the network.

As part of its ongoing effort to conserve area codes, on April 2, 1999, the Commission filed a petition with the FCC seeking authority to implement number conservation measures, which would help minimize consumer confusion and expenses associated with imposing new area codes too frequently.

On September 15, 1999, the FCC issued an Order (FCC 99-249) granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures.⁶ In its Order, the FCC granted the Commission interim authority to:

- (1) Institute 1KNP by all LNP-capable carriers in Florida;
- (2) Reclaim unused and reserved NXX codes;

⁶Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, NSF File No. L-99-23 (rel. September 15, 1999)

- (3) Maintain rationing procedures for six months following area code relief;
- (4) Set numbering allocation standards;
- (5) Request number utilization data from all carriers;
- (6) Implement NXX code sharing; and
- (7) Implement rate center consolidation.

In its petition and reply comments to the FCC, the Commission stated that all carriers must have reasonable access to numbering resources in order to compete effectively in the telecommunications markets. Further, number conservation measures do not hinder reasonable access to numbering resources. On the contrary, they protect the resource for all market participants. Requiring the distribution of NXXs at thousand-block levels still provides equitable, efficient, and timely access to all carriers. Number conservation measures would not adversely affect call routing in the nation; would not place some carriers at risk; and would not delay area code implementation during a jeopardy period. Number conservation measures such as 1KNP would provide equal access to all numbering resources.

Staff agrees with the FCC (FCC's notice of proposed rulemaking order FCC 99-122, ¶ 1) that any measure that increases the efficiency with which numbers are utilized will result in significant consumer benefits, by helping to alleviate the disruption and expense associated with frequent area code exhaust. Due to these urgent reasons, the FCC delegated authority to Florida and other state commissions in late 1999. It is obvious that many states are facing the same problems as Florida. States realize that there is a need for an urgent solution.

In its notice of proposed rulemaking docket (FCC 99-122, ¶ 14), the FCC states:

Equally importantly, numbering resource optimization efforts are necessary to address the considerable burdens imposed on consumers by the inefficient administration of numbering resources. Consumers face additional costs, both tangible and intangible, when a new area code is implemented in their local area. We believe that consumers should not be subjected to these increased costs and inconveniences except when absolutely necessary.

Due to these urgent reasons and to avoid placing any more burden on the customers, the FCC delegated interim authority to Florida as well as other state commissions. The following chart

indicates the states who filed petitions before the FCC for delegation of authority and when the FCC granted such authority:

State	Petition for Delegated Authority	FCC Granted Authority
California	11/2/99 & 4/23/99	9/15/99
Florida	4/2/99	9/15/99
Massachusetts	2/17/99	9/15/99
New York	2/19/99	9/15/99
Maine	3/17/99	9/15/99
Texas	7/2/99	11/30/99
Connecticut	7/28/99	11/30/99
Wisconsin	8/5/99	TBD ⁷
Ohio	9/13/99	TBD
New Hampshire	9/15/99	TBD
Nebraska	9/14/99	TBD
Indiana	10/21/99	TBD
Utah	10/25/99	TBD
Missouri	11/1/99	TBD
Iowa	11/10/99	TBD
Tennessee	11/17/99	TBD
North Carolina	11/99	TBD
Virginia	11/29/99	TBD

To exercise the FCC's delegation of authority, many state commissions have taken various actions such as ordering mandatory implementation of 1KNP in different area codes.

⁷To Be Determined: The FCC asked for reply comments but has not made a decision yet.

Based on a staff workshop, held on October 20, 1999, staff along with the industry, Office of Public Counsel, and an interested person formed a Steering Committee, or "committee," to come up with a working solution. The committee formed five working groups:

- a) Thousand-block number pooling;
- b) Rate center consolidation;
- c) Code sharing;
- d) Short-term efficiency; and
- e) Legal issues.

The 1KNP group met several times in the last two months to find workable solutions. The pooling group agreed to recommend mandatory implementation of 1KNP in Florida. Staff provided the pooling group with its analysis on number utilization.

The group examined each area code for any possible pooling implementation. Criteria for selecting the area codes were established since it was not easy to select an area code or area codes. First, the group tried to select an area code in which it was simpler to implement the first pooling mechanism. Second, the group examined the area codes which had fewer exchanges, and a considerable number of vacant NXXs and thousand blocks. Last, the group considered the degree of CLEC competition in the area codes. The 1KNP group has also started working on cost recovery mechanisms. Staff finds that the cost issues should be dealt within a later proceeding after the FCC's final numbering order in March.

The pooling group developed a priority list of area codes using the criteria the group developed. As a result, the pooling group selected the 954, 561, and 904 area codes for 1KNP implementation:

The FCC's Florida Order (FCC 99-249, ¶ 21) states:

We reiterate that the authority we grant herein to the Florida Commission to undertake thousands-block pooling trials is interim in nature, and is in no way intended to relieve the Florida Commission of its obligation to implement necessary area code relief in a timely fashion.

Therefore, based on the FCC's Order, the Commission needs to establish relief mechanisms for the area codes in which 1KNP will be mandated. Staff notes that the time needed to implement an overlay relief plan is approximately 90 days. The time needed to

implement a geographic split plan or a combination of several relief mechanisms usually take at least six to twelve months. Staff believes that one of the alternatives proposed in the area code dockets could be used to provide relief.

In conclusion, based on the pooling group's decision made on February 4, 2000, staff recommends that on an interim basis the Commission order the mandatory implementation of 1KNP for all LNP-capable carriers in the 954, 561, and 904 area codes. Staff also recommends that one of the alternatives proposed for the 904, 561, and 904 area code dockets be used as a backup plan to provide relief, pending completion of the evidentiary proceeding in Docket Nos. 990457-TL (Area Code 954), 990456-TL (Area Code 561), and 990517-TL (Area Code 904).

ISSUE 3: In order to obtain initial numbering resources to serve a particular NXX, should the Commission establish any prerequisite criteria for all carriers, and if so, what should those criteria be?

RECOMMENDATION: Yes. In addition, to completing all the required entries on a Code Request Form, as required by the INC Central Office Code (NXX) Assignment Guidelines, the Commission should require that all carriers provide the following additional information to substantiate their request for initial numbering resources: 1) an approved interconnection agreement with the incumbent local exchange company (ILEC); and 2) facilities readiness within the NXX activation time frame of six months. Facilities readiness shall be defined as having the requisite equipment in place to allow a carrier to activate a telephone number such that the customer assigned to that specific number is able to make and receive calls over the public switched network.
(CUTTING)

STAFF ANALYSIS: Paragraph 33 of FCC Order 99-249 sets forth the FCC's concerns regarding the establishment of fill rates or other criteria for new entrants. Specifically, the FCC stated:

First, the Florida Commission may only consider a carrier's fill rate in relation to growth codes. We do not believe that a carrier's ability to establish a service "footprint" should be restricted. That is, a

carrier ought to be able to obtain initial numbering resources in rate centers where the carrier is authorized to offer service and plans to do so within the NXX activation time frame (sic) established by the CO Code Assignment Guidelines (six months). We wish to avoid imposing barriers to competitive entry into the telecommunications marketplace.

However, as the number of new entrants has increased, the demand for NXX codes in many of Florida's NPAs, especially in the metropolitan areas, has increased causing the supply of NXXs to be depleted much sooner than anticipated. Staff believes that the number of initial numbering requests that are granted could be reduced if some basic changes were made to the NXX application process.

At present, the process by which carriers request numbering resources in order to begin offering service in a particular rate center is based in part on the successful completion and submission of a Code Request Form. However, section 6.1.2 of the INC Central Office Code (NXX) Assignment Guidelines also states: ". . . It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines."

Currently, section 6.1.4 of the INC Central Office Code (NXX) Assignment Guidelines states:

The code applicant shall certify on the Code Request Form that to the best of his/her knowledge necessary governmental/regulatory authorization has been obtained to provide service(s) for which the code is being requested."

Staff believes that reliance on "certified" statements does not provide a sufficient factual basis to demonstrate compliance with the governmental approval provision. Mandatory inclusion of actual interconnection documentation would create a minimal administrative and financial burden on the applicant when submitting the Code Request Form. Therefore, staff proposes that a copy of an approved interconnection agreement be included as part of any carrier's initial numbering request.

Similarly, staff believes that all carriers should be required to submit, as part of their Code Request Form, a written statement detailing the type(s) of equipment that is or will be installed in the rate center that is capable of providing "facilities readiness"

within the NXX activation time frame of six months. Staff proposes that facilities readiness should be defined as having the requisite equipment in place to allow a carrier to activate a telephone number such that the customer assigned to that specific number is able to make and receive calls over the public switched network. As in the case of submitting an approved interconnection agreement, staff believes that there would be minimal impacts on the applicant in terms of complying with this requirement.

Therefore, in addition to completing all the required entries on a Code Request Form, as required by the INC Central Office Code (NXX) Assignment Guidelines, the Commission should require that all carriers provide the following additional information to substantiate their request for initial numbering resources: 1) an approved interconnection agreement with the ILEC; and 2) facilities readiness within the NXX activation time frame of six months. Facilities readiness shall be defined as having the requisite equipment in place to allow a carrier to activate a telephone number such that the customer assigned to that specific number is able to make and receive calls over the public switched network.

ISSUE 4: What requirements should the Commission establish for thousand-block number management by all code holders?

RECOMMENDATION: The Commission should establish the following sequential requirements for thousand-block number management by all code holders:

- Step 1: Telephone numbers should be assigned from thousand-blocks with greater than 10% contamination, until an overall 75% utilization rate is reached.
- Step 2: Telephone numbers should be assigned from a single thousand-block with less than 10% contamination, until a 75% utilization rate is reached within that block.
- Step 3: Step 2 should be repeated until a 75% utilization rate is reached in all thousand-blocks. **(CUTTING)**

STAFF ANALYSIS: Paragraph 29 of FCC Order 99-249 reads in part:

Specifically, the Florida Commission may require that carriers achieve a certain fill rate in growth NXX codes and within thousands blocks, in areas where it has implemented thousands-block pooling.

In paragraph 31 of the same Order the FCC asked that the Florida Commission "consult and coordinate" with other state commissions that may obtain authority to impose fill rates in order to establish fill or utilization rates that are not inconsistent with those imposed by other states. Beginning in October 1999, staff has participated, via conference call, in a multistate working group whose purpose is to coordinate the efforts of states who have been, or are awaiting the delegation of numbering authority from the FCC.

One of the primary reasons why Florida sought the authority to impose a utilization rate was that some carriers who have been assigned NXXs do not have an existing or projected need for the 10,000 telephone numbers available in an NXX. Thus, many numbers remain unused and unavailable for assignment to any other carrier. In addition, current industry guidelines allow carriers to assign numbers throughout the entire 10,000 block, thereby reducing the opportunity to impose any sort of sequential block number utilization criteria. This situation is particularly troublesome to carriers who are unable to obtain NXXs in a timely manner due to NXX rationing brought on by premature area code exhaust. Thus, until such time as the national assignment guidelines are revised, it is critical that Florida provide a means to ensure that carriers are using their numbers with maximum efficiency.

NXX codes can be divided into ten blocks of 1,000 numbers (e.g., 0001-0999, 1000-1999, 2000-2999, etc.). The imposition of a utilization rate simply means that a carrier must assign a specific percentage of the 1,000 numbers in a block before assigning numbers from another block. One of the benefits of this approach is that blocks with little or no contamination (i.e., few assigned numbers) can be returned to the numbering administrator for use in a thousand-block pooling program.⁸

⁸The primary components of a pooling program are described in Issues 2, 8, and 9.

With respect to existing NXXs, staff proposes that carriers be required to meet a utilization rate using the following sequential procedures for thousand-block number management:

Step 1. In blocks with more than a specified contamination percentage, carriers would be allowed to assign numbers until a specified utilization rate was achieved.

Step 2. In a block with less than a specified contamination percentage, carriers would be permitted to assign numbers until a specified utilization rate was achieved.

Step 3. Step 2 would be repeated until an overall utilization rate was achieved for all available blocks.

With respect to initial NXXs, carriers would be required to meet the utilization rate using steps 2 and 3.

The critical issue before Florida, as well as the other states with numbering authority, is what are appropriate contamination and utilization criteria? As stated earlier, staff has been participating in a multistate working group whose purpose is to establish consistent contamination and utilization rate criteria.

The INC Thousand Block Pooling Guidelines define a contaminated block as:

a block of one thousand telephone numbers in which at least one telephone number is in any of the following categories: administrative number, aging number, assigned number, or reserved number.

However, for purposes of establishing an inventory of thousand blocks for a pooling program, the Guidelines also state that carriers should protect thousand-blocks with 0% to 10% contamination from further contamination.⁹ Given that 10% is viewed as a technically acceptable contamination level for pooling purposes, Commission staff, as well as the other states with numbering authority, have proposed the adoption of a 10%

⁹See Section 8.2.4 Block Protection Date, INC Thousand Block (NXX-X) Pooling Administration Guidelines, INC 99-0127-023, Revised December 2, 1999 by the State Coordination Group and presented to the FCC on January 20, 2000, p. 22.

contamination rate for purposes of establishing thousand-block number management criteria.

The industry currently has no fill rate (i.e., utilization rate) requirement for NXXs or thousand-blocks, but rather employs a "months-to-exhaust" (MTE) calculation for purposes of determining when to request another NXX. However, states have not been satisfied that the MTE calculation by itself is a sufficient test for determining the need for new numbering resources. Thus, the states have investigated whether the combination of a utilization rate and MTE calculation is a more accurate determination of need. There was considerable discussion regarding whether a single utilization rate, applicable to all states, was appropriate given that some states had only one area code; NXX growth varied between rural and urban areas; and the number and type of new entrants was not predictable. However, the states did agree that the utilization rate should require that a carrier utilize a significant percentage of the available numbers before filing a request for a new NXX. The states including Florida, concluded that a 75% utilization rate, in combination with the MTE calculation, was a reasonable combination of criteria to be employed when assessing a request for numbering resources.

Staff believes that the thousand-block number management requirements set forth below are consistent with the authority delegated by the FCC. Although the requirements may limit a customer's choice for specific numbers or specific ranges of numbers, staff does not believe that the requirements deprive customers of their choice of carriers or the carriers from requesting additional numbering resources.

Therefore, staff recommends that the Commission should establish the following sequential requirements for thousand-block number management by all code holders:

- Step 1: Telephone numbers should be assigned from thousand-blocks with greater than 10% contamination, until an overall 75% utilization rate is reached.
- Step 2: Telephone numbers should be assigned from a single thousand-block with less than 10% contamination, until a 75% utilization rate is reached within that block.
- Step 3: Step 2 should be repeated until a 75% utilization rate is reached in all thousand-blocks.

ISSUE 5: When applying for additional numbering resources, what information should be provided to the numbering administrator?

RECOMMENDATION: Any code holder applying for additional numbering resources should be required to provide the numbering administrator with information substantiating that it has achieved a 75% utilization rate in all applicable thousand-block(s) and that its existing numbering resource will exhaust in less than 6 months. (CUTTING)

STAFF ANALYSIS: Paragraph 29 of FCC Order 99-249 reads in part:

Subject to the conditions set forth below, we hereby delegate authority to the Florida Commission to require NXX code applicants to demonstrate that they have met certain fill rates prior to obtaining additional numbering resources, even in NPAs which are not in jeopardy.

As indicated in Issue 4, the industry has no fill rate requirement for NXXs or thousand-blocks, but rather employs a "months-to-exhaust" (MTE) calculation for purposes of determining when to request another NXX. Current code holders must certify that their numbering resources will exhaust within 12 months. In addition, the MTE worksheet contains data regarding the number of telephone numbers available for assignment and a growth history for 6 months. The current numbering administrator relies on the MTE as the basis for making a determination of the need for additional numbering resources.

States have not been satisfied that sole reliance on the MTE calculation is a sufficient test for determining the need for new numbering resources. Throughout the various conference calls, there was considerable discussion regarding the industry's use of a 12 MTE projection. Most states agreed that this forecast was too long and, in many cases, resulted in an inaccurate forecast. Given the rate at which numbering resources are being assigned in many area codes, one can understand their level of dissatisfaction. The states agreed that reducing the forecasted exhaust to a 6 month window and imposing a 75% utilization rate for existing numbering resources was a more reasonable combination of criteria for assessing the need for new numbering resources.

In FCC 99-249, ¶ 34, the FCC stated that the imposition of utilization rates, among other things, could overburden the NANPA, or any numbering administrator, which based its bid for providing number administration services on industry guidelines that are applicable nationwide. Staff does not believe that verification of a utilization rate calculation by NANPA would be burdensome. However, staff proposes that all code holders be provided with a worksheet detailing how to calculate the utilization rate. Although NANPA is not required to verify the utilization calculation, staff proposes that the utilization worksheet be submitted to NANPA or the numbering administrator as part of a code holder's application for additional numbering resources. NANPA, or the numbering administrator, would verify the 6 MTE forecast utilizing the same procedure currently set forth in the INC Central Office Code (NXX) Assignment Guidelines for the 12 MTE.

Therefore, given the above analysis, staff recommends that the Commission should require all code holders applying for additional numbering resources to provide the numbering administrator with information substantiating that it has achieved a 75% utilization rate in all applicable thousand-block(s) and that its existing numbering resource will exhaust in less than 6 months.

ISSUE 6: What procedure should be followed to address situations in which a code holder believes it will be unable to satisfy a utilization rate and MTE criteria, and will need additional numbering resources to meet projected telephone number demand?

RECOMMENDATION: A code holder should file a request for extension of time with the Commission and provide substantiating information including number utilization data, the 6 MTE calculation, and back-up information showing why the code holder expects demand will exceed its resources. Responses, if any, to the request may be filed within 7 days. No additional time should be allowed for mailing. The Commission should endeavor to provide a decision to the code holder within 30 calendar days of receipt of the extension request. (CUTTING, CALDWELL)

STAFF ANALYSIS: Paragraph 34 of FCC 99-249 granted the Commission the authority to request and evaluate information provided by code holders to demonstrate compliance with the utilization rate. The FCC also stated in ¶30 that "...we urge the Florida Commission to

allow for some flexibility in establishing fill rates and applying them to carriers." Staff believes that the use of a request for extension of time is a logical process to address the FCC's language in these paragraphs.

All carriers must be able to react in a timely manner to customer requests for numbers. The extension of time procedure provides a means to determine the validity of a hardship claim prior to an official numbering resource request being filed with the numbering administrator.

Staff proposes that extension of time requests be judged on a case-by-case basis. However, as additional experience is gained regarding the nature and frequency of requests for extensions of time, staff notes that it may be necessary to revisit the request for extension of time process in the future.

Therefore, in situations in which a code holder believes it will be unable to satisfy the 75% utilization rate and 6 MTE criteria, and will need additional numbering resources to meet projected telephone number demand, staff recommends that the Commission require code holders to:

1. file a request for extension of time with the Commission; and
2. provide substantiating information including number utilization data, the 6 MTE calculation, and back-up information showing why the code holder expects demand will exceed its resources.

Responses, if any, to the request may be filed within 7 days. No additional time should be allowed for mailing. The Commission should endeavor to provide a decision to the code holder within 30 calendar days of receipt of the extension request.

ISSUE 7: What type of verification process should be implemented to ensure the accuracy of information provided by carriers to the numbering administrator in order to substantiate numbering resource requests, and who should perform this function?

RECOMMENDATION: Staff recommends that the Commission verify and reconcile on an as needed basis a) information submitted by

carriers to the numbering administrator to substantiate numbering resource requests; b) information available from the LERG; and c) submissions provided in response to any Division of Telecommunications' data requests. (**CUTTING**)

STAFF ANALYSIS: In FCC 99-249, ¶ 2, the FCC stated that its regulations generally require that numbering administration:

(1) facilitate entry into the telecommunications marketplace by making telecommunications resources available on an efficient and timely basis to telecommunications carriers; (2) not unduly favor or disfavor any particular industry segment or group of telecommunications consumers; and (3) not unduly favor one telecommunications technology over another. Further, our regulations specify that, if the Commission delegates any telecommunications numbering administration functions to any state, the states (sic) must perform the functions in a manner consistent with these general requirements.

If the Commission is to comply with these requirements, it is critical that the Commission have a means to verify and reconcile a carrier's application for numbering resources. If carriers are allowed to obtain numbering resources that subsequently are not activated or are grossly underutilized, all carriers will suffer and new entrants may be denied a legitimate opportunity to compete in a particular rate center due to an inadequate inventory of thousand-blocks or NXXs. This becomes especially important in those NPAs where NXX rationing is in effect.

There are three primary sources of numbering information available to the Commission that could be used to verify numbering resource requests, namely: the utilization data submitted by the code holder; code activation data from the Local Exchange Routing Guide; and data submitted in response to specific data requests from the Division of Telecommunications. A study of these sources has the potential to verify carrier-specific data and utilization rates as well as identify other numbering discrepancies. Consequently, staff believes that the Commission needs to perform this verification and reconciliation function.

Staff does not propose that all requests for numbering resources need to be verified. Staff believes that the frequency of checks (i.e., as needed basis) and the opportunity to verify a carrier's information from three different sources should encourage carriers to refrain from filing unwarranted requests for numbering resources. However, if there is apparent abuse, staff emphasizes

that it may be necessary to revise this verification process and modify the code application process. Such revisions could entail the imposition of a penalty for noncompliance with established guidelines; stricter access to new numbering resources; additional reporting requirements for subsequent applications; or stricter thousand-block management of existing resources.

Therefore, staff recommends that the Commission verify and reconcile on an as needed basis a) information submitted by carriers to the numbering administrator to substantiate numbering resource requests; b) information available from the LERG; and c) submissions provided in response to any Division of Telecommunications' data requests.

ISSUE 8: Which software release(s) should be used to implement 1KNP, and what should be the number pooling inventory time line (NPIT) for the 954, 561, and 904 area codes?

RECOMMENDATION: Upon approval of Issue 2, staff recommends the following software releases and implementation dates for the 954, 561, and 904 area codes:

Area Code (NPA)	Software Release	Implementation Date
954	1.4	May 1, 2000
561	1.4	July 1, 2000
904	3.0	October 1, 2000

Staff also recommends that the Commission order all code holders in the 954, 561, and 904 area codes to adhere to the NPIT set forth below:

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NPIT	Area Code (NPA)		
	954	561	904
Regulatory Mandate	March 3, 2000	March 3, 2000	March 3, 2000
First Implementation Meeting	March 17, 2000	March 31, 2000	April 14, 2000
Forecast /Utilization Report	April 3, 2000	April 17, 2000	May 1, 2000
Block Protection Date	April 6, 2000	April 24, 2000	June 5, 2000
Block Donation Identification Date	April 10, 2000	May 8, 2000	June 26, 2000
PA Assessment of Industry Inventory Surplus /Deficiency	April 17, 2000	May 22, 2000	July 17, 2000
Block Donation Date: SP Updates LERG on Donated Blocks	April 21, 2000	June 5, 2000	August 14, 2000
Pool Start / Allocation Date: PA updates LERG on Allocated Blocks	April 28, 2000	June 12, 2000	September 11, 2000
Mandated Implementation Date	May 1, 2000	July 1, 2000	October 1, 2000

(ILERI)

STAFF ANALYSIS: Currently, there are two software releases to implement 1KNP: NPAC¹⁰ Software Release 1.4 (SR14) and NPAC Software Release 3.0 (SR30). The initial purpose of SR14 was in support of a number pooling test trial in Illinois. The main difference between the two releases is the inclusion of Efficient Data Representation (EDR) in SR30 which permits downloading and database storage of 1,000 numbers as a single record instead of 1,000 records. This capability, only available in SR30, was developed to resolve LNP database capacity issues associated with widespread telephone number pooling deployment. For this reason, it is considered to be a critical requirement by many service providers.

The states with delegated pooling authority are required by the FCC to determine cost allocation and recovery mechanisms for 1KNP trials. NANPA states that "Orders to date delegating interim pooling authority did not specify if the states need to complete this task prior to ordering a pooling trial. States can however begin the process for pooling while addressing cost allocation and recovery".¹¹

The 1KNP group reached a consensus on recommending SR30 for all 1KNP trials in Florida. Staff recognizes the industry's point of view in recommending SR30 because NeuStar, the current 1KNP administrator for some states, indicated in a prior meeting that SR30 would be available at the end of June of this year. However, NeuStar also indicated that the SR30 trial tests would take about four to six months and if problems arise, there would be more delays in implementing 1KNP. Any delay in implementation is problematic because carriers who are not LNP-capable will continue to require assignment of full central office codes (NXXs) even after the implementation of 1KNP. The longer the Commission delays the start of 1KNP, the fewer full NXXs will be available for participating carriers and therefore the quicker the 954, 561, and 904 area codes will exhaust.

Staff believes that Florida cannot wait until SR30 becomes available to begin 1KNP. Other states¹² have already ordered the implementation of SR14. Staff strongly recommends that Florida must move forward using the software available to us at this time.

¹⁰NPAC stands for Number Portability Administration Center.

¹¹Source: <http://www.nanpa.com/reports/faq.html#s5>

¹²Illinois, New York, California, Maine, New Hampshire, and Texas.

Staff further believes that a start date of May 1, 2000, is a reasonable accommodation of the carriers' needs relating to the modification of their operational support systems (OSSs) and our duty to protect the citizens of Florida from the costs and inconveniences associated with the premature implementation of new area code(s).

The Illinois Commerce Commission is the first state to implement the 1KNP using SR14. Based on the delegation of authority from the FCC, the Maine, California, New York, New Hampshire, Texas, and Massachusetts state commissions ordered the mandatory implementation of 1KNP using SR14. The following is a summary of these states' implementation schedules using SR14:

State Commission and NPA	Implementation Date
Illinois (847)	February 1, 1999
California (310)	March 18, 2000
California (415)	July 29, 2000
California (714)	November 4, 2000
New York (716)	April 1, 2000
New Hampshire (603)	May, 2000
Maine (207)	June 1, 2000
Texas (512)	August 1, 2000
Massachusetts (508)	TBD
Massachusetts (617)	TBD
Massachusetts (781)	TBD
Massachusetts (978)	TBD

The California and Massachusetts state commissions ordered 1KNP to be implemented on a staggered schedule in multiple area codes pertaining to different Metropolitan Statistical Areas (MSAs) in a staggered schedule. The FCC states that the state commissions, including Florida, must allow sufficient transition time between 1KNP trials. Specifically, the FCC 99-249 ¶ 19 states:

After having implemented a thousands-block number pooling trial in one MSA, the Florida Commission may wish to expand to another MSA.¹³ Should it wish to do so, we direct the Florida Commission to allow sufficient transition time for carriers to undertake any necessary steps, such as modifying databases and upgrading switch software, to prepare for an expansion of thousands-block pooling to another MSA.¹⁴ In other words, start dates for thousands-block pooling trials in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps. The purpose of a staggered roll-out is to provide carriers time to upgrade or replace their SCPs and other components of their network, as necessary, if the increased volume of ported numbers as a result of the pooling trial requires them to do so.

Staff notes that the entire 954 area code is in Ft. Lauderdale MSA. BellSouth states that the entire area is Location Routing Numbers/LNP (LRN/LNP) capable. The 561 area code is in the West Palm Beach MSA which encompasses only Palm Beach County. The Jacksonville MSA which contains Nassau and Duval Counties is in the 904 area code. Staff realizes that in the 904 area code, there may be regions or carriers which may not be LNP capable, but given the implementation time frame, all carriers should be able to make the necessary changes.

Therefore, based upon the aforementioned discussion and upon approval of Issue 2, staff recommends the following software releases and implementation dates for the 954, 561, and 904 area codes:

¹³A thousands-block pooling trial is implemented when LNP-capable carriers are contributing and receiving numbers in blocks of 1,000 from the pool. Furthermore, for a pooling trial to have been implemented, a pooling administrator must be chosen and responding to requests from carriers for numbering resources.

¹⁴ See Letter from Todd D. Daubert, Counsel for Winstar, to Magalie R. Salas, Secretary, FCC, dated July 28, 1999 (detailing concerns with expanding the thousands-block pooling trial in Illinois to other NPAs, and noting that Winstar requires approximately 90 days to prepare its OSS systems for new pooling markets).

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Area Code (NPA)	Software Release	Implementation Date
954	1.4	May 1, 2000
561	1.4	July 1, 2000
904	3.0	October 1, 2000

Staff has worked with other state commissions to draft time frames to implement 1KNP. Staff also recommends that the Commission order all code holders in the 954, 561, and 904 area codes to adhere to NPIT set forth below:

NPIT	Area Code (NPA)		
	954	561	904
Regulatory Mandate	March 3, 2000	March 3, 2000	March 3, 2000
First Implementation Meeting	March 17, 2000	March 31, 2000	April 14, 2000
Forecast /Utilization Report	April 3, 2000	April 17, 2000	May 1, 2000
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PA Assessment of Industry Inventory Surplus /Deficiency	April 17, 2000	May 22, 2000	July 17, 2000
Block Donation Date: SP Updates LERG on Donated Blocks	April 21, 2000	June 5, 2000	August 14, 2000

Pool Start / Allocation Date: PA updates LERG on Allocated Blocks	April 28, 2000	June 12, 2000	September 11, 2000
Mandated Implementation Date	May 1, 2000	July 1, 2000	October 1, 2000

ISSUE 9: Should the Commission order all code holders in the 954, 561, and 904 area codes to designate a 1KNP Administrator (1KNPA) for the 954, 561, and 904 area codes?

RECOMMENDATION: Yes. Staff recommends that the Commission order all code holders in the 954, 561, and 904 area codes to designate a 1KNPA for the 954, 561, and 904 area codes in Florida. Staff also recommends that all code holders in the 954, 561, and 904 area codes should utilize the state commissions' revised version of the INC 1KNP Guidelines submitted to the FCC on January 20, 2000 for all 1KNP trials in Florida. (ILERI)

STAFF ANALYSIS: In order to implement 1KNP, a neutral third-party administrator must be retained. The North American Numbering Council (NANC) has recommended to the FCC that CIS¹⁵/NANPA be named the national 1KNPA. The FCC has yet to act upon the NANC's recommendation. Currently, CIS is administering the 1KNP trials in Illinois and New York. CIS has agreed with NANC to provide pooling administration services pursuant to the terms approved by the NANC in those states that are granted authority by the FCC to implement mandatory 1KNP trials.

Given CIS's experience in serving as the 1KNPA, it is likely that CIS/NANPA will be named the national 1KNPA. However, staff believes that the industry should undertake whatever steps are necessary to ensure that a neutral-third party is selected as their Florida 1KNPA.

¹⁵Communications Industry Services

The FCC's Florida order also required the Commission to implement 1KNP trials according to the industry-adopted 1KNP guidelines. The FCC further provided, however, that the Commission could depart from those guidelines if the Commission deemed it appropriate after first consulting with the industry regarding the implications of any proposed changes (FCC 99-249, ¶ 13).

The FCC, in all of its state orders, indicated that states should work together to develop consistent 1KNP guidelines. As a result of this cooperative effort, the state commissions including Florida filed an ex-parte communication letter with the FCC on January 21, 2000. The states' revised version of the INC 1KNP guidelines were included with that letter. Attachment B is a copy of the revised 1KNP guidelines.

Based on the foregoing discussion, staff recommends that the Commission order all code holders in the 954, 561, and 904 area codes to designate a 1KNPA for the 954, 561, and 904 area codes in Florida. Staff also recommends that all code holders in the 954, 561, and 904 area codes should utilize the state commissions' revised version of the INC 1KNP Guidelines submitted to the FCC on January 20, 2000 for all 1KNP trials in Florida.

ISSUE 10: Should this docket be closed?

RECOMMENDATION: No. Staff recommends that this docket should not be closed as other issues remain. However, any person whose substantial interests are affected by the proposed agency action may file a protest within 21 days of the issuance of the Commission's Order. If no timely protest of Issues 1 through 9 is filed, the Order will become final upon the issuance of a Consummating Order. If a protest is filed by a person whose substantial interests are affected, if possible, a (any) proceeding should be conducted pursuant to Section 120.57(2), Florida Statutes, or by other appropriate expedited process. (CALDWELL)

STAFF ANALYSIS: Staff recommends that this docket should not be closed as other issues remain. However, any person whose substantial interests are affected by the proposed agency action may file a protest within 21 days of the issuance of the Commission's Order. If no timely protest of Issues 1 through 9 is filed, the Order will become final upon the issuance of a

DOCKET NO.: 981444-TP
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Consummating Order. If a protest is filed by a person whose substantial interests are affected, if possible, a (any) proceeding should be conducted pursuant to Section 120.57(2), Florida Statutes, or by other appropriate expedited process.

Federal Communications Commission

FCC 99-249

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

In the Matter of)
)
Florida Public Service Commission Petition to) CC Docket No. 96-98
Federal Communications Commission for) NSD File No. L-99-33
Expedited Decision for Grant of Authority to)
Implement Number Conservation Measures)

ORDER

Adopted: September 15, 1999

Released: September 15, 1999

By the Commission:

I. INTRODUCTION

1. This order responds to the Florida Public Service Commission's (Florida Commission) April 2, 1999, Petition for Expedited Decision for Grant of Authority to Implement Number Conservation Measures (Petition) requesting additional authority from the Commission to implement various area code conservation measures in the state of Florida. We herein conditionally grant the Florida Commission the authority to institute thousands-block pooling trials; reclaim unused and reserved NXX codes, and portions of those codes; maintain rationing procedures for six months following area code relief; set numbering allocation standards; and require the submission of utilization data from all carriers; and implement NXX code sharing. We reiterate that consolidating rate centers/areas already is within the authority of the Florida Commission. Therefore, while no action on our part appears to be necessary with respect to this aspect of the Florida Commission's request, we grant the Florida Commission's request for any additional authority it may need to consolidate rate centers to optimize the use of numbering resources. We deny the Florida Commission's requests for authority to implement unassigned number porting; to order carriers to expand deployment of LNP; and to direct the NANPA to conduct quarterly Central Office Code Utilization Surveys (COCUS). The Florida Commission may, however, undertake such surveys itself. We decline to reach the Florida Commission's requests to revise NXX code rationing procedures and to institute rationing prior to arriving at an area code relief plan at this time. Although we grant the Florida Commission interim authority to institute many of the optimization measures raised in its Petition, this grant will be superseded by forthcoming decisions in the *Numbering Resource Optimization* proceeding¹ that will establish national guidelines, standards, and procedures for numbering optimization. Thus, this limited grant of delegated authority should not be construed as prejudging any of the issues on which the Commission has sought public comment in the *Numbering Resource Optimization Notice*.

¹ See *Numbering Resource Optimization, Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 99-122 (rel. June 2, 1999) (*Numbering Resource Optimization Notice*).

II. BACKGROUND

2. Congress granted the Commission plenary jurisdiction over numbering issues.² Section 251(e)(1) of the Act also allows the Commission to delegate to state commissions all or any portion of its jurisdiction over numbering administration.³ The Commission's regulations generally require that numbering administration: (1) facilitate entry into the telecommunications marketplace by making telecommunications resources available on an efficient and timely basis to telecommunications carriers; (2) not unduly favor or disfavor any particular industry segment or group of telecommunications consumers; and (3) not unduly favor one telecommunications technology over another.⁴ Further, our regulations specify that, if the Commission delegates any telecommunications numbering administration functions to any state, the states must perform the functions in a manner consistent with these general requirements.⁵

3. On September 28, 1998, the Commission released the *Pennsylvania Numbering Order* delegating additional authority to state commissions to order NXX code rationing in conjunction with area code relief decisions, in the absence of industry consensus.⁶ The order further approved a mandatory thousands-block number pooling trial in Illinois.⁷ The order provided that state utility commissions could order voluntary pooling trials,⁸ but in view of the Commission's efforts to develop national pooling standards, we declined to delegate to state commissions the general authority to order mandatory number pooling.⁹ The *Pennsylvania Numbering Order*, however, encouraged state commissions to seek further limited delegations of authority to implement other innovative number conservation methods prior to implementing number conservation plans.¹⁰

4. In its Petition, the Florida Commission requests that the Commission grant it the authority to: (1) institute thousands-block number pooling;¹¹ (2) implement NXX code sharing

² 47 U.S.C. § 251(e).

³ 47 U.S.C. § 251(e)(1).

⁴ 47 C.F.R. § 52.9(a).

⁵ 47 C.F.R. § 52.9(b).

⁶ *Pennsylvania Numbering Order* at 19025, ¶ 24.

⁷ *Id.* at 19029-30, ¶ 30.

⁸ *Id.* at 19027-28, ¶¶ 27-28.

⁹ *Id.* at 19027, ¶ 27. Subject to conditions, we permitted states to order the withholding of a certain number of NXX codes within a new area code from assignment and saved for pooling. *Id.*

¹⁰ *Id.* at 19030, ¶ 31.

¹¹ The Petition notes in a parenthetical that the Florida Commission might also consider number pooling in blocks of 100. Petition at 3. The Florida Commission provides no details of pooling at the hundreds-block level, and we note that the number pooling guidelines developed to date do not address hundreds-block pooling. We therefore decline to address this aspect of the Petition.

within rate centers; (3) revise rationing procedures and institute NXX lotteries prior to adopting an area code relief plan; (4) reclaim unused and reserved NXX codes; (5) maintain NXX code rationing measures for six months following implementation of area code relief plans; (6) expand deployment of permanent LNP; (7) implement unassigned number porting; (8) consolidate rate centers; and (9) require all carriers to submit utilization data at the thousands-block level.¹² In addition, the Florida Commission requests that this Commission direct the NANPA to conduct the Central Office Code Utilization Survey (COCUS)¹³ quarterly and establish code allocation standards to more efficiently manage numbering resources. The Florida Commission states that it requests this additional authority as part of its ongoing area code relief proceeding and to minimize consumer confusion and expenses associated with imposing new area codes too frequently.¹⁴ On April 15, 1999, the Petition was placed on Public Notice for public comment.¹⁵

III. DISCUSSION

5. We recognize that the area code situation in Florida is critical, with nine new area codes having been added since 1995, six of which may already be in jeopardy.¹⁶ In light of this extreme situation and in order to empower the Florida Commission to take steps to make number utilization more efficient, we herein grant significant additional authority to the Florida Commission. In some instances, we are granting the Florida Commission authority that goes beyond the parameters outlined in the *Pennsylvania Numbering Order*, because we find such grant to be appropriate in light of the specific circumstances in Florida.

6. Many of the measures proposed in the Florida Commission's Petition are also examined in a Notice of Proposed Rulemaking that this Commission recently released.¹⁷ Although we grant the Florida Commission interim authority to institute many of the optimization measures in the Petition, we do so subject to the caveat that this grant will be superseded by forthcoming decisions in the *Numbering Resource Optimization* proceeding that will establish national guidelines, standards, and procedures for numbering optimization. This limited grant of delegated authority should not be construed as a prejudgment of any of the

¹² Petition at 2-5.

¹³ The NANPA administers the COCUS annually, which asks each carrier to provide information on the total number of NXX codes assigned to it in each NPA, as well as its forecasted demand for NXX codes over the next five years. *Numbering Resource Optimization Notice* at ¶ 71.

¹⁴ Petition at 7.

¹⁵ Common Carrier Bureau Seeks Comment on the Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures, *Public Notice*, DA 99-725 (rel. April 15, 1999). See also Common Carrier Bureau Seeks Comment on State Utility Commission Requests for Additional Authority to Implement Telecommunications Numbering Conservation Measures, *Public Notice*, DA 99-1198 (rel. June 22, 1999).

¹⁶ Petition at 1.

¹⁷ See *Numbering Resource Optimization Notice*.

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measures on which the Commission has sought public comment in the *Numbering Resource Optimization Notice*.

7. Congress granted this Commission exclusive jurisdiction over those portions of the North American Numbering Plan (NANP) that relate to the United States, and directed that the Commission administer the NANP in a manner which assures that numbering resources are available on an equitable basis.¹⁸ The Commission was also granted the authority to delegate this jurisdiction to state utility commissions. Thus, while we grant authority below to the Florida Commission to engage in various matters related to administration of the NANP in Florida, we require the Florida Commission to abide by the same general requirements that this Commission has imposed on the numbering administrator. Thus, the Florida Commission, to the extent it acts under the authority delegated herein, must ensure that numbers are made available on an equitable basis; that numbering resources are made available on an efficient and timely basis; that whatever policies the Florida Commission institutes with regard to numbering administration not unduly favor or disfavor any particular telecommunications industry segment or group of telecommunications consumers; and that the Florida Commission not unduly favor one telecommunications technology over another.¹⁹

8. The grants of authority herein are not intended to allow the Florida Commission to engage in number conservation measures to the exclusion of, or as a substitute for, unavoidable and timely area code relief.²⁰ While we are giving the Florida Commission tools that may prolong the lives of existing area codes, the Florida Commission continues to bear the obligation of implementing area code relief when necessary, and we expect the Florida Commission to fulfill this obligation in a timely manner. Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for a want of numbering resources. For consumers to benefit from the competition envisioned by the Telecommunications Act of 1996, it is imperative that competitors in the telecommunications marketplace face as few barriers to entry as possible.

9. Several commenting parties urged the Commission to grant the Florida Commission's Petition in its entirety on the basis that state utility commissions require greater authority to implement number conservation measures in order to rectify the causes of area code exhaust.²¹ Other parties suggested that we deny the Petition on the basis that number conservation measures must be developed at the national level, and that the Petition does not provide an adequate basis on which to grant the requested delegations of authority.²²

¹⁸ 47 U.S.C. § 251(e)(1).

¹⁹ See 47 C.F.R. § 52.9(a). See also 47 U.S.C. § 251(e)(1).

²⁰ *Pennsylvania Numbering Order* at 19027, ¶ 26.

²¹ See Citizens of Florida comments; Connecticut Commission comments; New York Commission comments; Pennsylvania Office of Consumer Advocate comments; Texas Commission comments; Maine Commission reply.

²² See BellSouth comments; CTIA comments; Nextel comments; PCIA comments; PrimeCo comments; US

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10. *Thousands-block number pooling.* The Florida Commission requests authority to institute thousands-block number pooling.²³ This Commission has tentatively concluded that thousands-block pooling is an important numbering resource optimization strategy, essential to extending the life of the NANP.²⁴ In granting the Illinois Commission the authority to engage in a mandatory thousands-block pooling trial in the *Pennsylvania Numbering Order*, this Commission recognized that state number pooling trials could aid in developing national pooling implementation, architecture, and administrative standards. The Florida Commission, noting that development of nationwide thousands-block pooling rules may take considerable time, requests the authority to implement its own thousands-block pooling requirements in advance of any federal rules.²⁵

11. Commenters representing incumbent local exchange carriers oppose permitting state utility commissions to order thousands-block pooling trials, mainly on the basis that multiple, inconsistent trials would pose an administrative burden to carriers that are present in various states.²⁶ Several wireless carriers have also voiced their opposition to thousands-block pooling trials based on the premise that such trials would require the implementation of local number portability (LNP).²⁷ Some competitive local exchange carriers and other state utility commissions have voiced their support for thousands-block pooling trials as a means to allocate numbers more efficiently and ensure that carriers are given greater access to numbering resources.²⁸

12. We have been concerned that the existence of multiple pooling trials in a state or region may strain the capacities of carriers' Service Control Points (SCPs),²⁹ which could affect

West comments.

²³ Historically, network routing mechanisms are based upon the understanding that geographic numbers are assigned on an NXX code basis and associated with a specific switch, and, correspondingly, that the network address to which the call must be routed is embedded in the first six digits (NPA-NXX) of the called number. Thousands-block number pooling allows service providers in a given area to receive numbers in blocks of 1,000 by breaking the association between the NPA-NXX and the service provider to whom the call is routed. Through number pooling, participating carriers can effectively share numbering resources from NXX codes rather than receiving an entire NXX code at a time. *Numbering Resource Optimization Notice* at ¶ 130.

²⁴ *Numbering Resource Optimization Notice* at ¶ 138.

²⁵ Petition at 3.

²⁶ See USTA comments at 7.

²⁷ See CTIA comments at 6; Omnipoint Communications comments at 8; PCIA comments at 8.

²⁸ See Connecticut Commission comments at 3; Massachusetts Commission comments at 5; MediaOne comments at 3-4; Texas Commission comments at 3.

²⁹ A Service Control Point (SCP) is a database in the public switched network which contains information and call processing instructions needed to process and complete a telephone call. The network switches access an SCP to obtain such information. Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, 11 FCC Rcd 8352, 8402 n.288 (1996).

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the ability of carriers' networks to perform LNP and pooling functions. We note, however, that the volume of ported numbers is significantly lower than previously anticipated.³⁰

13. Although we remain concerned about the potential strain which multiple thousands-block pooling trials in an MSA, state or region may have on the functioning of the public switched telephone network, we nonetheless believe this relief is appropriate given the strain on Florida's numbering resources. Furthermore, since the release of the *Pennsylvania Numbering Order*, the telecommunications industry has arrived at detailed guidelines governing the technical and administrative functioning of thousands-block number pooling. In the *Pennsylvania Numbering Order*, we stated that upon the establishment of uniform, national standards for pooling, we may determine that it is appropriate to delegate to state commissions the additional authority to implement and enforce those standards.³¹ We therefore grant authority to the Florida Commission to conduct mandatory thousands-block number pooling trials in Florida. We agree with the concern raised by many wireline commenters, however, that inconsistent pooling trials could pose a burden to carriers. To ameliorate this concern, we direct the Florida Commission to conduct its pooling trials in accordance with industry-adopted thousands-block pooling guidelines.³² Where the Florida Commission determines that changes, modifications, or departures from the guidelines are desirable, we direct the Florida Commission to consult with the industry prior to implementing such changes. Although we will not dictate the manner in which the Florida Commission should consult with industry, the Florida Commission should at a minimum, seek input from the industry regarding the implications of any proposed changes to the guidelines so that the Florida Commission may be able to weigh the industry's concerns in its decision-making process.

14. We grant this authority subject to the conditions and safeguards similar to those enumerated in the *Pennsylvania Numbering Order* that granted such authority to Illinois.³³ Thus, we require that in any NPA which is in jeopardy in which the Florida Commission implements a pooling trial, the Florida Commission must take all necessary steps to prepare an NPA relief plan that may be adopted by the Florida Commission in the event that numbering resources in the NPA at issue are in imminent danger of being exhausted.³⁴ This criterion is not intended to

³⁰ A projection by the Local Number Portability Administrator, Lockheed Martin IMS, and all seven LLCs projected that over a two-year period, a total of 634,556 numbers would be ported during 1998 and 2,658,669 numbers would be ported during 1999 for a single region. Since there are seven LLCs, the total amount of ported numbers nationwide for the two years is projected to be 23.05 million. LNPA Industry Demand Model, Exhibit N-1, at 5 (1998). The actual amount of total numbers ported as of May 1999 was only 1,789,369. See *Local Competition: August 1999*, Industry Analysis Division, Common Carrier Bureau, Federal Communications Commission.

³¹ *Id.* at 19028, ¶ 28.

³² Thousand Block (NXX-X) Pooling Administration Guidelines, Draft (INC 99-0127-023) (rev. Jan. 27, 1999) (Thousand Block Pooling Guidelines). This document is available at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

³³ *Pennsylvania Numbering Order* at 19029-30, ¶ 30.

³⁴ In Illinois, the Illinois Commission recognized a "back-up plan" was necessary because the pooling solution had not been completely developed or tested. Thus, it ordered that an all-services overlay would supersede the

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require the Florida Commission to implement an NPA relief plan prior to requiring thousands-block number pooling in Florida. Rather, we require only that the Florida Commission be prepared to implement a “back-up” NPA relief plan prior to the exhaustion of numbering resources in the NPA at issue.³⁵ Consumers should never be in the position of being unable to exercise their choice of carrier because that carrier does not have access to numbering resources. This criterion attempts to ensure that consumers continue to retain a choice of telecommunications providers in the event that the pooling trial or trials do not stave off the need for area code relief.

15. Only those carriers that have implemented permanent LNP shall be subject to the trial.³⁶ At the present time, we do not grant the Florida Commission the authority to require a carrier to acquire LNP solely for the purpose of being able to participate in a thousands-block pooling trial.³⁷ Carriers are only required to implement LNP if requested by another carrier subject to the requirements established by this Commission.³⁸ Within NPAs that are subject to the pooling trial, non-LNP capable carriers shall have the same access to numbering resources after pooling is implemented that they had prior to the implementation of a pooling regime, *i.e.*, non-LNP capable carriers shall continue to be able to obtain full NXX codes. We recognize that conditioning the Florida Commission’s authority to implement a mandatory thousands-block pooling trial on exemption of non-LNP capable carriers from participation in the trial will create a disparity in the way different types of service providers obtain access to numbering resources, in tension with the criteria set forth above.³⁹ In order to ensure that consumers may continue to obtain service from non-LNP capable carriers of their choosing, however, we find that for the

pooling trial in the event that the NXXs in the 847 NPA were depleted. *Id.*

³⁵ See Petition by Citizens Utility Board to Implement a form of telephone number conservation known as number pooling within the 312, 773, 847, 630, and 708 area codes and Petition by Illinois Bell Telephone Company for Approval of an NPA Relief Plan for the 847 NPA, Docket Nos. 97-0192 and 97-0211 (Consol.), Order (May 11, 1998) (establishing an area code overlay as a back-up plan concurrently with ordering thousands-block pooling in the 847 NPA). Although the Illinois Commission had an NPA relief plan in place in the 847 NPA to relieve what it had forecast to be imminent exhaust, through number conservation measures, including thousands-block pooling, it has forestalled the need for area code relief. See Petition of the Illinois Commerce Commission for Expedited Temporary Waiver of 47 C.F.R. § 52.19(c)(3)(ii) at 2-3 (filed August 11, 1999).

³⁶ Wireless carriers are not required to implement LNP until November 2002, or until this Commission releases an order establishing requirements for wireless carriers’ participation in number pooling in the *Numbering Resource Optimization* docket. See Cellular Telecommunications Industry Association’s Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability, *Memorandum Opinion and Order*, WT Docket No. 98-229 and CC Docket No. 95-116, 14 FCC Rcd. 3092, 3116 ¶ 48 (1999).

³⁷ The Florida Commission requests the authority to expand deployment of permanent LNP, but does not provide a rationale specifically supporting the request. Petition at 4. We interpret this request to be related to the Florida Commission’s petition for authority to conduct thousands-block pooling trials, because requiring carriers to implement LNP has the potential to increase the number of carriers that can participate in the pooling trials.

³⁸ See 47 C.F.R. § 52.23(b)-(c).

³⁹ See *supra* ¶ 8.

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purposes of this interim delegation, it is necessary to safeguard these carriers' access to numbering resources, while they lack the technical capability to participate in pooling. The *Numbering Resource Optimization Notice* raises a number of issues relating to non-LNP capable carriers' participation in pooling, and we believe these issues are best addressed in the larger rulemaking context. In the meantime, we suggest to the Florida Commission that it urge the non-LNP capable carriers to use various other numbering resource optimization strategies such as those discussed in the *Numbering Resource Optimization Notice* to improve the efficiency of numbering resources assigned to such carriers.

16. We direct the Florida Commission to ensure that an adequate transition time is provided to carriers to implement pooling in their switches and administrative systems. Thousands-block pooling requires carriers to alter significantly the manner in which they account for their inventory of telephone numbers, including changing their Operations Support Systems (OSSs) and retraining their staffs.⁴⁰ In addition, we also urge the Florida Commission not to require carriers to engage in processes related to thousands-block pooling which might divert critical resources away from preparations related to the Year 2000 rollover.⁴¹

17. We further require that the Florida Commission determine the method to recover the costs of the pooling trials.⁴² The Florida Commission must also determine how carrier-specific costs directly related to pooling administration should be recovered.⁴³ The Commission has tentatively concluded that thousands-block number pooling is a numbering administration function, and that section 251(e)(2) authorizes the Commission to provide the distribution and recovery mechanisms for the interstate and intrastate costs of number pooling.⁴⁴ We conclude that inasmuch as we are hereby delegating numbering administration authority to the Florida Commission, the Florida Commission must abide by the same statute applicable to this Commission, and, therefore, ensure that costs of number pooling are recovered in a competitively neutral manner.⁴⁵ We note that the *Telephone Number Portability* proceeding

⁴⁰ See Letter from Todd D. Daubert, Counsel for Winstar, to Magalie R. Salas, Secretary, FCC, dated July 28, 1999.

⁴¹ See National Association of Regulatory Utility Commissioners (NARUC), "Resolution Urging State Commissions to Consider Honoring Utility Requests to Defer Deadlines Because of Y2K Considerations," adopted July 23, 1999. See also Memorandum from Jacob J. Lew, Director, Chief Information Officers Council, to the heads of executive Florida Commissions and agencies, dated May 14, 1999 (requesting that federal agencies refrain from establishing requirements that would have an adverse effect on the Year 2000 readiness of regulated entities).

⁴² The *Numbering Resource Optimization Notice* tentatively concluded that thousands-block number pooling administration involved three categories of costs: (1) shared industry costs, which include the cost to fund the pooling administrator; (2) carrier-specific costs directly related to thousands-block pooling implementation, including, for example, costs directly related to updating carriers' LSMS to support pooling; and (3) carrier-specific costs not directly relating to thousands-block pooling implementation. *Numbering Resource Optimization Notice* at ¶¶ 203-09.

⁴³ See *id.* at ¶ 197.

⁴⁴ *Id.* at ¶ 193.

⁴⁵ 47 U.S.C. § 251(e)(2).

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found that section 251(e)(2) requires all carriers to bear the costs of number portability on a competitively neutral basis, and, thus, established a cost recovery mechanism that assesses even carriers that cannot or have not implemented LNP to date.⁴⁶ The Florida Commission may consider the recently released *Telephone Number Portability Order* for guidance regarding the criteria with which a cost recovery mechanism must comply in order to be considered competitively neutral:

First, “a ‘competitively neutral’ cost recovery mechanism should not give one service provider an appreciable, incremental cost advantage over another service provider, when competing for a specific subscriber.” Second, the cost recovery mechanism “should not have a disparate effect on the ability of competing service providers to earn normal returns on their investments.”⁴⁷

Consistent with our treatment of cost recovery in the *Telephone Number Portability* proceeding, we believe that even those carriers that cannot participate in pooling at this time will benefit from the more efficient use of numbering resources that pooling will facilitate. We also encourage the Florida Commission to consider the “road map” provided by the *Numbering Resource Optimization Notice* regarding cost recovery for thousands-block number pooling.⁴⁸

18. In order to minimize possible disruption and expense and maximize the value of the information that can be obtained from number pooling trials, we believe that such trials should be limited in nature. As an initial matter, we limit the authority we grant to the Florida Commission to a trial that generally covers one Metropolitan Statistical Area (MSA).⁴⁹ We believe that such a limitation strikes the appropriate balance among the Florida Commission’s desire to move quickly to implement measures that will enhance number utilization efficiency, and possibly prolong the lives of certain area codes in Florida, and our obligation to ensure that such pooling trials are implemented and conducted in a manner that does not disrupt network operations or reliability. We believe these goals ultimately benefit consumers in Florida by

⁴⁶ Telephone Number Portability, *Third Report and Order*, 13 FCC Rcd 11701, 11759 (1998). The Commission also found that it was equitable for all telecommunications carriers, even those without end-user revenues and those not directly involved in number portability, to contribute towards LNP costs because they will all benefit from number portability’s role in increasing local competition and ameliorating number exhaust concerns by making number pooling possible. *Id.*

⁴⁷ Telephone Number Portability, *Fourth Memorandum Opinion and Order on Reconsideration*, CC Docket No. 95-116, RM 8535, FCC 99-151, at ¶ 32 (rel. July 16, 1999) (citing Telephone Number Portability, CC Docket No. 95-116, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 8352, 8420-21 (1996)).

⁴⁸ *Numbering Resource Optimization Notice* at ¶¶ 193-210.

⁴⁹ MSAs are geographic areas designated by the Bureau of Census for purposes of collecting and analyzing data. The boundaries of MSAs are defined using statistics that are widely recognized as indications of metropolitan character. See Policy and Rules Concerning Rates for Dominant Carriers, *Memorandum Opinion and Order*, CC Docket No. 87-313, FCC 97-168 (rel. May 30, 1997) at 17 n.26. When implementing LNP, the Commission established a phased implementation schedule based on MSAs. Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, RM 8535, 11 FCC Rcd 8352, 8394-95, ¶ 81 (1996)

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allowing the Florida Commission to move forward with pooling trials quickly in whatever area it determines it is most necessary, while providing some assurance that the network changes required for the trials are implemented in a manner that does not disrupt the normal functioning of the network in Florida and nationwide.

19. After having implemented a thousands-block number pooling trial in one MSA, the Florida Commission may wish to expand to another MSA.⁵⁰ Should it wish to do so, we direct the Florida Commission to allow sufficient transition time for carriers to undertake any necessary steps, such as modifying databases and upgrading switch software, to prepare for an expansion of thousands-block pooling to another MSA.⁵¹ In other words, start dates for thousands-block pooling trials in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps. The purpose of a staggered roll-out is to provide carriers time to upgrade or replace their SCPs and other components of their network, as necessary, if the increased volume of ported numbers as a result of the pooling trial requires them to do so.

20. We suggest to the Florida Commission that it consider concentrating its thousands-block pooling trial in those NPAs which are the best candidates for pooling, based on the considerations set forth in the *Numbering Resource Optimization Notice*.⁵² For example, we encourage the Florida Commission to consider number pooling in areas where multiple, LNP-capable carriers exist. We also suggest to the Florida Commission that it allow for exceptions to participating in a pooling trial, if doing so would prove prohibitively expensive to a particular carrier. For example, certain switch types may not be able to accommodate thousands-block number pooling.⁵³ Finally, as we stated in the *Numbering Resource Optimization Notice*, we encourage the Florida Commission, to the extent it has not already done so, to consider consolidating rate centers prior to implementing pooling.⁵⁴ Fewer, larger pools logically increase the effectiveness of thousands-block pooling.⁵⁵

21. We reiterate that the authority we grant herein to the Florida Commission to undertake thousands-block pooling trials is interim in nature, and is in no way intended to relieve the Florida Commission of its obligation to implement necessary area code relief in a timely fashion. Whatever decisions this Commission reaches with regard to thousands-block pooling

⁵⁰ A thousands-block pooling trial is implemented when LNP-capable carriers are contributing and receiving numbers in blocks of 1,000 from the pool. Furthermore, for a pooling trial to have been implemented, a pooling administrator must be chosen and responding to requests from carriers for numbering resources.

⁵¹ See Letter from Todd D. Daubert, Counsel for Winstar, to Magalie R. Salas, Secretary, FCC, dated July 28, 1999 (detailing concerns with expanding the thousands-block pooling trial in Illinois to other NPAs, and noting that Winstar requires approximately 90 days to prepare its OSS systems for new pooling markets).

⁵² *Numbering Resource Optimization Notice* at ¶¶ 148-53.

⁵³ See *id.* at ¶ 149.

⁵⁴ See *id.* at ¶ 151.

⁵⁵ See *id.*

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administration and guidelines will supersede whatever systems the Florida Commission puts in place prior to enactment of those rules.

22. *Reclamation of unused and reserved NXX codes.* The Florida Commission also requests the authority to reclaim unused and reserved NXX codes in Florida, noting that the possibility of reclaiming reserved NXX codes for future distribution could extend the lives of existing area codes.⁵⁶ The CO Code Assignment Guidelines provide that carriers shall activate NXXs within six months of the “initially published effective date.”⁵⁷ Most commenters support the reclamation of unused codes,⁵⁸ and those opposed to this delegation are not necessarily opposed to reclaiming unused codes in general, but rather assert that the NANPA is responsible for reclamation activities.⁵⁹ Reclaiming NXX codes that are not in use may serve to prolong the life of an area code, because these codes are added to the total inventory of assignable NXX codes in the area code. Therefore, we grant authority to the Florida Commission to investigate whether code holders have activated NXXs assigned to them within the time frames specified in the CO Code Assignment Guidelines, and to direct the NANPA to reclaim NXXs that the Florida Commission determines have not been activated in a timely manner. This authority necessarily implies that the Florida Commission may request proof from all code holders that NXX codes have been “placed in service” according to the CO Code Assignment Guidelines.⁶⁰ We further direct the NANPA to abide by the Florida Commission’s determination to reclaim an NXX code if the Florida Commission is satisfied that the code holder has not activated the code within the time specified by the CO Code Assignment Guidelines.

23. We note that the CO Code Assignment Guidelines dictate substantial procedural hurdles prior to reclaiming an unused NXX, in part to afford the code holder an opportunity to explain the circumstances that have led to a delay in code activation.⁶¹ New entrants, in particular, may suffer unexpected delays or scheduling setbacks beyond their control, which lead to code activation delays.⁶² We clarify that the Florida Commission need not follow the

⁵⁶ Florida Petition at 4.

⁵⁷ See Central Office Code (NXX) Assignment Guidelines, INC 95-0407-008 (rev. Apr. 26, 1999) at § 6.3.3 (CO Code Guidelines). This document is available at <<http://www.atis.org/atis/clc/incdocs.htm>>.

⁵⁸ Connecticut Commission comments at 3; Level 3 comments at 2-3; MediaOne comments at 6.

⁵⁹ AT&T comments at 12; GTE comments at 9; MCI WorldCom comments at 9.

⁶⁰ Under the CO Code Assignment Guidelines, carriers are obligated to submit to the NANPA within six months of the requested effective date of newly obtained NXX codes a Part 4 certification that the code has been placed in service. See CO Code Assignment Guidelines NXX Assignment Request Form, Part 4.

⁶¹ For example, the CO Code Guidelines dictate that the CO Code Administrator must refer to the INC for resolution of any matter relating to an NXX code that has not been activated within the timeframe specified in the guidelines. CO Code Assignment Guidelines at § 8.2.2. The INC must then investigate the referral and attempt to resolve the referral. CO Code Assignment Guidelines at § 8.3. Absent consensus resolution, the matter is then referred to the “appropriate regulatory body” for resolution. *Id.*

⁶² See Level 3 comments at 2-3 (stating that carriers should not be forced to return unused NXX codes prematurely if business plans call for their use in the foreseeable future); MediaOne comments at 6 (stating that CLECs that obtain codes prior to launching service must have the flexibility to activate initial codes while in the

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reclamation procedures set forth in the CO Code Assignment Guidelines relating to referring the issue to the Industry Numbering Committee (INC), as long as the Florida Commission accords the code holder an opportunity to explain the extenuating circumstances, if any, behind the unactivated NXX codes.

24. Reclamation of blocks of 1,000 numbers with no contamination, or a relatively low contamination rate, has the potential to add significant numbering resources in areas where thousands-block number pooling has been implemented.⁶³ To the extent we have delegated the authority to initiate thousands-block number pooling trials, we also delegate authority to the Florida Commission to reclaim unused thousands blocks in connection with such trials. The conditions that apply to the implementation of a thousands-block number pooling trial shall also apply to any reclamation of unused blocks of numbers. In particular, the industry's guidelines regarding reclamation of thousands blocks shall apply to the Florida Commission.⁶⁴

25. *Maintenance of rationing procedures for six months following area code relief.* The Florida Commission requests the authority to maintain current NXX code rationing measures for six months following area code relief.⁶⁵ It states that this authority would be used to control the accelerated demand for NXX codes in the relieved area code that accompanies the announcement of an area code relief plan.⁶⁶

26. Although most industry parties are opposed to granting an extension of rationing procedures because it delays needed area code relief and thereby inhibits carriers' ability to obtain numbering resources with which to serve customers,⁶⁷ there is a competitive LEC that contends that allowing an additional six months of rationing would not cause undue harm to any carrier.⁶⁸

27. The *Pennsylvania Numbering Order* stated that state commission implementation of number conservation measures could not be used "as substitutes for area code relief or to avoid making difficult and potentially unpopular decisions on area code relief."⁶⁹ Requesting a continuation of rationing after area code relief has been implemented does not contradict the

process of rolling out telephony throughout the state).

⁶³ *Numbering Resource Optimization Notice* at ¶ 187.

⁶⁴ See *Thousand Block Pooling Guidelines* at §§ 8.1.4-8.1.5 (specifying only that blocks with less than ten percent contamination shall be donated to the industry pool of thousands blocks).

⁶⁵ Petition at 4.

⁶⁶ *Id.*

⁶⁷ AT&T comments at 10-1; MCI WorldCom comments at 9-10; MediaOne comments at 7; Sprint comments at 6-7; USTA comments at 6.

⁶⁸ Level 3 comments at 4.

⁶⁹ *Pennsylvania Numbering Order* at 19027, ¶ 26.

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Pennsylvania Numbering Order, as the requisite area code relief has, in fact, been implemented. This measure seeks only to provide “breathing room” to state commissions that have just undergone the difficult process of implementing a new area code. Furthermore, a limitation of six months does not have the potential—in contrast to rationing prior to area code relief—to forestall area code relief indefinitely.

28. Where area code relief takes the form of an area code split, we grant the Florida Commission the authority to direct that whatever rationing plan was in place prior to area code relief continue to be applied in both the newly implemented area code and the relieved area code for a period of up to six months following the area code relief date.⁷⁰ Correspondingly, if the area code relief is in the form of an overlay, the Florida Commission may direct that the pre-existing rationing plan be applied to both the overlay code and the relieved code for a period of six months following the area code relief date. For reasons discussed in paragraph 38 below, we limit this authority to continuing the pre-NPA relief rationing procedures. Whether the rationing plan in place prior to relief was an industry consensus plan, or whether it was a state commission-ordered plan, only those terms in place prior to area code relief may remain in place for up to six months following area code relief. The Florida Commission may order a continuation of rationing for up to six months, but neither the Florida Commission, nor the telecommunications industry participants in a consensus plan may alter the terms of the rationing plan. We find this limitation appropriate to prevent a potentially contentious re-opening of the terms of a previously settled code rationing plan, resulting in uncertainty and a drain on resources.

29. *Setting NXX code allocation standards.* The Florida Commission requests that this Commission direct the NANPA to establish code allocation standards to manage numbering resources more efficiently.⁷¹ In the context of the *Numbering Resource Optimization* proceeding, we may in the future establish code allocation standards that differ from the months-to-exhaust standard that currently exists.⁷² We agree with the Florida Commission that extension of this authority to non-jeopardy NPAs will encourage more efficient use of NXX codes.⁷³ Subject to the conditions set forth below, we hereby delegate authority to the Florida Commission to require NXX code applicants to demonstrate that they have met certain fill rates prior to obtaining additional numbering resources, even in NPAs which are not in jeopardy.⁷⁴

⁷⁰ The “NPA relief date” is defined in the NPA Code Relief Planning and Notification Guidelines as the date by which the NPA is introduced and routing of normal commercial traffic begins. NPA Code Relief Planning and Notification Guidelines at 14.0.

⁷¹ Petition at 5.

⁷² See *Numbering Resource Optimization Notice* at ¶¶ ??-??

⁷³ See Petition at 5.

⁷⁴ The *Pennsylvania Numbering Order* invited states to consider imposing usage thresholds on carriers before obtaining NXX codes within the same rate center in jeopardy situations subject to state-ordered NXX code rationing plans. *Pennsylvania Numbering Order* at 19025-26, ¶ 24. An area code jeopardy situation exists when the forecasted demand for numbering resources exceeds the known supply during the planning and implementation interval for relief in the form of the introduction of a new area code. See CO Code Assignment Guidelines at § 13.0.

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Specifically, the Florida Commission may require that carriers achieve a certain fill rate in growth NXX codes⁷⁵ and within thousands blocks, in areas where it has implemented thousands-block pooling.

30. Notwithstanding this grant of authority to the Florida Commission, we remain very concerned about the potential competitive impact of imposing a fill-rate regime on carriers' ability to serve customers. A strict fill-rate regime may not accommodate customers' requests for specific numbers or specific ranges of numbers. This concern and others about the use of fill rates as opposed to the industry's current "months-to-exhaust" model are set forth in the *Numbering Resource Optimization Notice*.⁷⁶ In this light, although we do not wish to dictate the parameters of the fill-rate regime, we urge the Florida Commission to allow for some flexibility in establishing fill rates and applying them to carriers. Our primary concern, therefore, is that fill rates not be applied in such a manner as to deprive customers of their choice of carriers from whom to purchase service upon request.

31. We are also concerned about the impact of multiple, disparate number conservation regimes on the availability of telecommunications services and the industry's ability to forecast and plan properly for exhaust of the NANP.⁷⁷ Therefore, during its implementation of this authority, we ask that the Florida Commission consult and coordinate with other state commissions that may obtain authority to impose fill rates.⁷⁸ We encourage the Florida Commission to establish fill rates that are not inconsistent with those imposed by other states.

32. Despite these concerns, we recognize the need to address the critical situation in Florida. In setting certain guidelines for the Florida Commission to follow, we hope to allay concerns about possible competitive impacts, while enabling the Florida Commission to adopt a quantifiable means of ensuring that carriers are using their numbers with maximum efficiency.

33. First, the Florida Commission may only consider a carrier's fill rate in relation to growth codes. We do not believe that a carrier's ability to establish a service "footprint" should

⁷⁵ A "growth" code is an additional NXX code requested for an established switching entity, point of interconnection, or rate center when the telephone numbers available for assignment in previously assigned NXX codes will not meet expected demand. CO Code Guidelines at § 13.0. An "initial" code is the first NXX code assigned to the carrier at a new switching entity, POI or unique rate center, and the administrator is to assign initial codes to the extent required to terminate traffic. *Id.*

⁷⁶ *Numbering Resource Optimization Notice* at ¶¶ 62-68.

⁷⁷ See *Pennsylvania Numbering Order* at 19019-20, ¶ 15.

⁷⁸ See *Common Carrier Bureau Seeks Comment on State Utility Commission Requests for Additional Authority To Implement Telecommunications Numbering Conservation Measures*, *Public Notice*, NSD File Nos. L-98-136, L-99-19, L-99-21, L-99-27, L-99-33, DA 99-1198 (rel. June 22, 1999) (California, Florida, Maine, Massachusetts, New York); *Common Carrier Bureau Seeks Comment on the Texas Public Utility Commission Petition for Delegation of Additional Authority to Implement Number Conservation Measures*, *Public Notice*, NSD File No. L-99-55, DA 99-1380, (rel. July 14, 1999); *Common Carrier Bureau Seeks Comment on the Connecticut Department of Public Utility Control's Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures*, *Public Notice*, NSD File No. L-99-62, DA 99-1555 (rel Aug. 5, 1999).

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be restricted. That is, a carrier ought to be able to obtain initial numbering resources in rate centers where the carrier is authorized to offer service and plans to do so within the NXX activation timeframe established by the CO Code Assignment Guidelines (six months). We wish to avoid imposing barriers to competitive entry into the telecommunications marketplace. A carrier that is newly providing service may not be able to achieve a prescribed fill rate in an NXX code (or thousands-block, if the numbering request is in an area where the Florida Commission has instituted thousands-block number pooling) for quite some time. With respect to fill rates, however, we conclude that the importance of bringing choice to consumers outweighs the numbering inefficiencies experienced by new entrants.

34. Second, as stated in the *Pennsylvania Numbering Order*, we are concerned that granting this request and other, similar requests will overburden the NANPA, which based its bid for providing number administration services on industry guidelines that are applicable nationwide.⁷⁹ Therefore, to avoid imposing an additional burden on the NANPA, to the extent that the Florida Commission chooses to implement a fill-rate requirement, we delegate authority to the Florida Commission to ascertain carrier compliance with the fill-rate requirement. To avoid delay in NXX code application processing, we direct the Florida Commission to conduct its review of carrier compliance with any required fill rate within the ten-day timeframe established by the CO Code Assignment Guidelines as the time in which the NANPA must respond to an applicant's NXX code request. Of course, a carrier's failure to provide the Florida Commission with adequate evidence of compliance with the fill-rate requirement upon request will toll the running of this 10-day timeframe. Further, while we delegate to the Florida Commission the authority to request and evaluate information provided by carriers to demonstrate compliance with the fill rate, we request that the Florida Commission not release such information to any entity other than the NANPA, this Commission, or the Common Carrier Bureau.

35. The Florida Commission also requests that it be allowed to use the Line Number Utilization Survey (LINUS)⁸⁰ to run NXX code reports quarterly, that the FCC direct the NANPA to update the COCUS quarterly, and that the FCC direct wireless carriers to provide necessary telephone number utilization information at the thousands-block level.⁸¹ In the *Numbering Resource Optimization Notice*, this Commission sought public comment on both the frequency and the level of detail in which carriers should report data relating to their utilization of numbering resources.⁸² Thus, at this time we decline to grant the Florida Commission the

⁷⁹ See *Pennsylvania Numbering Order* at 19031-32, ¶ 33 (finding that if every state commission implemented its own NXX code administration measures, the NANPA would have the potentially impossible task of performing its code administration and NPA relief planning functions in a manner consistent with industry guidelines and fifty-one different state regimes).

⁸⁰ The NANPA has proposed replacing the current COCUS with the LINUS. LINUS would conduct a survey of forecast data quarterly at the rate center level. Utilization data would be collected at the thousands-block level by rate center, quarterly in the largest 100 MSAs, and semiannually in the remaining MSAs. Also, collection of utilization data collection would occur more often in NPAs that are nearing jeopardy.

⁸¹ Petition at 5-6.

⁸² *Numbering Resource Optimization Notice* at ¶¶ 76-77.

authority to direct the NANPA to use LINUS in Florida and to direct the NANPA to update the COCUS quarterly. Nonetheless, we recognize the desire of the Florida Commission to obtain information relating to carriers' utilization of numbering resources both to aid it in planning for area code relief and for investigating the feasibility of thousands-block number pooling.

36. We therefore delegate to the Florida Commission the authority to conduct number utilization surveys from all carriers in order to help it plan area code relief projects and to determine the feasibility of pooling scenarios.⁸³ We reiterate, however, that because this is a topic of the *Numbering Resource Optimization Notice*, this grant of authority is limited in duration until such time as this Commission enacts rules or policies relating to collecting data on carriers' use of numbering resources.⁸⁴ We do not authorize the Florida Commission to direct the NANPA to undertake such surveys as part of its required functions.⁸⁵

37. *NXX code sharing.* The Florida Commission also requests the authority to "implement sharing of NXX codes in rate centers."⁸⁶ The Florida Commission has not provided any details with regard to how it would implement NXX code sharing, nor do there exist any industry guidelines on this numbering optimization measure. As we stated in the *Numbering Resource Optimization Notice*, we are interested in the possibility of NXX code sharing as a means to enable non-LNP-capable carriers to participate in or approximate the effect of pooling without requiring them to develop LNP capability.⁸⁷ We note that the Colorado Public Utilities Commission has studied NXX code sharing as a number optimization method,⁸⁸ and we encourage the Florida Commission to consult with members of the Colorado Commission and other state commissions, who may be familiar with this issue. We therefore encourage the Florida Commission to conduct a study regarding the technical and economic feasibility of NXX code sharing, its implications for the delivery of emergency services, and network impacts of NXX code sharing in Florida. We also encourage the Florida Commission to keep us informed of the results of its investigation on NXX code sharing. We permit the Florida Commission to implement NXX code sharing on a trial basis if the Florida Commission finds that NXX code sharing is technically and economically feasible, as well as cost effective.

38. *Rate Center Consolidation.* The Florida Commission also requests the authority to consolidate rate centers. Rate center consolidation involves creating larger geographic areas in which individual NXX codes can be used by consolidating or combining existing rate centers. Because many carriers, particularly competitive local exchange carriers, require NXX codes in

⁸³ See Petition at 5-6.

⁸⁴ See *Numbering Resource Optimization Notice* at ¶¶ 69-82.

⁸⁵ The Florida Commission, however, may negotiate with the NANPA to perform such surveys as optional enterprise services. See 47 C.F.R. 52.12(f)(2).

⁸⁶ Petition at 3.

⁸⁷ See *Numbering Resource Optimization Notice* at ¶ 175.

⁸⁸ See Colorado Telephone Numbering Task Force Report, December 31, 1998.

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most or all rate centers in an NPA to establish a competitive “footprint,” establishing larger rate centers has significant potential to reduce the demand for NXX codes.⁸⁹ Rate center consolidation, as it involves matters relating to local calling scopes and local call rating, falls under state utility commissions’ rate-making authority.⁹⁰ However, since rate center consolidations have the potential to increase the efficiency of utilization of numbering resources over which we have plenary jurisdiction, we grant the Florida Commission’s request for any additional authority it may need to consolidate rate centers since such consolidations will aid the Commission’s efforts in optimizing the use of numbering resources.

39. *Revision of rationing procedures.* The Florida Commission has also sought the authority to revise rationing procedures now in effect expressly for the purpose of prolonging the lives of existing area codes.⁹¹ Although the Florida Commission may order and revise rationing processes where it has ordered area code relief, established a relief date, and the industry has been unable to reach consensus on a rationing plan,⁹² rationing of NXX codes should only be for the express purpose of extending the life of the area code until the date of area code relief implementation.⁹³ As determined in the *Pennsylvania Numbering Order*, state commissions may not use rationing as a substitute for area code relief.⁹⁴ We believe that the authority we are herein delegating to the Florida Commission will provide the Florida Commission the tools it needs to address the underlying behaviors contributing to the inefficiencies of numbering use in Florida. We hope that the Florida Commission’s judicious exercise of these measures will, indeed, extend the lives of the area codes at issue in the Petition, as well as whatever new area codes might be introduced in Florida, and we invite the Florida Commission to keep this Commission apprised regarding the efficacy of these measures. Accordingly, at this time, we decline to reach the Florida Commission’s request for authority to revise rationing plans put into place pursuant to industry consensus.

40. *NXX code lotteries prior to adoption of area code relief plans.* The Florida Commission also seeks similar authority to institute NXX code lotteries prior to adopting NPA relief plans.⁹⁵ For the reasons stated above, we decline to grant the Florida Commission the broad authority it seeks to adopt rationing measures prior to having decided on a specific plan for area code relief.⁹⁶ Again, we believe that the authority we are herein delegating to the Florida

⁸⁹ *Numbering Resource Optimization Notice* at ¶ 106.

⁹⁰ See NANC Report Public Notice at 3.

⁹¹ According to the Florida Commission, 6 NXX codes are being rationed each month in the 508 and 617 area codes, 8 are being rationed monthly in the 781 area code, and 10 are being rationed in the 978 area code. Petition at 8.

⁹² See *Pennsylvania Numbering Order* at 19026-27, ¶ 25

⁹³ *Id.* at 19038-39, ¶ 48.

⁹⁴ See *id.* at 19027, ¶ 26.

⁹⁵ Petition at 3.

⁹⁶ Although we granted this authority to the California Commission, we note that unique circumstances exist in

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Commission will provide it with the tools it needs to address the underlying behaviors contributing to the inefficiencies of numbering use in Florida.

41. *Unassigned Number Porting.* The Florida Commission requests the authority to implement Unassigned Number Porting (UNP) as an additional tool to conserve numbering resources.⁹⁷ As described in the 1998 NANC Numbering Resource Optimization Report (NANC Report), UNP is a telephone number usage optimization measure where available individual telephone numbers in one service provider's inventory are ported, using LNP, to another service provider under the direction of a neutral third party coordinator for assignment by the second service provider to a specific customer.⁹⁸ The NANC Report focused on the use of UNP in extreme cases of number shortages, where individual service providers are otherwise completely unable to obtain telephone number to serve customers.⁹⁹ The Florida Commission has not provided us with information relating to the details of the proposed use of UNP in Florida.

42. We agree with most of the industry commenters that UNP is currently at too early a stage of development to order implementation.¹⁰⁰ We are also concerned with the impact of UNP on carriers' ability to control their own number inventories. With UNP, because service providers will obtain telephone numbers from other service providers' inventories, the service provider donating numbers may face difficulty forecasting future numbering needs.¹⁰¹ The NANC Report indicates that many companies' OSSs are designed to accommodate large inventories of telephone numbers, linking each street address to an NPA/NXX combination. If UNP leads to significant number porting, this mapping logic becomes quite difficult to support.¹⁰² We are also concerned with UNP's potential impact on companies' switching systems. UNP may cause problems with switches that can only accept a limited number of NXX

California which require public participation in the area code relief planning process at least 30 months prior to the submission of a recommended relief plan to the California Commission. See § 7930 of the California Public Utilities Code.

⁹⁷ Petition at 4-5.

⁹⁸ NANC Report at § 6.1.1.

⁹⁹ NANC Report at § 6.1.1.

¹⁰⁰ AT&T comments at 12 (stating that UNP is undeveloped and cannot be implemented in any meaningful way, but it may be appropriate to revisit the issue of whether a state-ordered UNP trial is appropriate following successful implementation of thousands-block pooling); Bell Atlantic comments at 4 (stating that implementing UNP with nationwide implementation of thousands-block pooling would only complicate and delay thousands-block pooling); MediaOne comments at 8-9 (stating that UNP puts a carrier at the mercy of its competitors to satisfy numbering requirements); RCN comments at 8 (stating that national standards are necessary for implementation of UNP); USTA comments at 9 (stating that implementing UNP anywhere would divert essential industry resources from the resolution of issues associated with thousands-block number pooling). See also California Commission comments at 13 (noting that more information is needed as to how UNP would work, and urging this Commission to address and resolve the issue).

¹⁰¹ NANC Report at § 6.6.2.

¹⁰² NANC Report at § 6.6.3.

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codes, as number inventories will be increasingly composed of random telephone numbers from many different NXX codes.¹⁰³ For the aforementioned reasons, we decline to grant the Florida Commission's request for authority to implement UNP.

43. We emphasize, however, that our determination not to grant the Florida Commission the authority to order carriers to use UNP does not preclude carriers from voluntarily engaging in UNP where mutually agreeable and where there are no public safety or network reliability concerns. As a matter of fact, we encourage the carriers to do so. Furthermore, we also encourage the Florida Commission to and the carriers to work together to identify and promote other innovative measures as well that would encourage the conservation of NXX codes.

IV. CONCLUSION

44. We recognize the difficult situation for consumers in Florida, having had to undergo several area code changes in only a few years, with the potential for more on the near horizon. The authority we have herein delegated to the Florida Commission, we hope, will provide it the tools it needs to address the situation. For example, the authority to order thousands-block pooling trials allows the Florida Commission to address inefficiencies on the supply side of the telephone number assignment regime by ordering that LNP-capable carriers receive smaller blocks of numbers than they now do. The authority to address carriers' fill rates allows the Florida Commission to address the demand side of the number assignment regime by requiring that carriers not request more numbering resources until they have used a certain percentage of those already in their inventory.

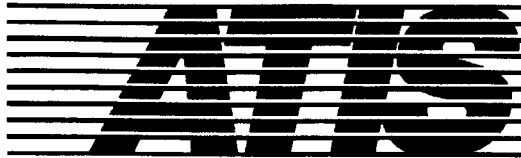
V. ORDERING CLAUSE

45. Accordingly, pursuant to sections 1, 4(i), and 251 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), and 251, and pursuant to sections 1.1 and 52.9(b) of the Commission's Rules, 47 C.F.R. §§ 1.1 and 52.9(b), IT IS ORDERED that the Florida Public Service Commission's Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures is GRANTED IN PART and DENIED IN PART to the extent described herein.

FEDERAL COMMUNICATIONS COMMISSION

Magalie Roman Salas
Secretary

¹⁰³ NANC Report at § 6.6.4.1.



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DRAFT WORKING DOCUMENT

**INDUSTRY NUMBERING
COMMITTEE (INC)**

**THOUSAND BLOCK (NXX-X)
POOLING ADMINISTRATION
GUIDELINES**

**As revised by the State
Coordination Group and
presented to the FCC on
January 20, 2000**

This Draft represents the efforts of staff members of the following state commissions: California, Connecticut, Colorado, Florida, Indiana, Maine, Massachusetts, Missouri, New Hampshire, New York, North Carolina, Ohio, Pennsylvania, Texas, Virginia, Washington, and Wisconsin. The staffs of these commissions generally support the proposed revisions. Please note, however, that none of the above-mentioned commissions have formally adopted or endorsed the revisions at this time.

These guidelines are reissued in connection with the resolution to INC Issues 180, 181, 188, , 200 and 203.

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1.0 Purpose and Scope

This document specifies guidelines for the process of administration and assignment of thousand blocks (NXX-Xs) to Local Number Portability (LNP)-capable service providers (SPs) for use at a switching entity or point of interconnection (POI) they own or control. This document contains guidelines which are not binding on each state. When a state commission determines or a state industry planning group recommends that the unique facts or the public interest in a particular state so require, the state commission may deviate from the guidelines as it deems appropriate and consistent with FCC policies. All thousand block requests and necessary forms will be submitted to the Pooling Administrator (PA) by filling out the appropriate request and/or form provided on the PA Web Site.¹ No requests and/or form submissions will be accepted via fax, paper, voice, or email, except in extraordinary circumstances and/or if previously agreed to by the PA. All electronic submissions will be considered as an electronic signature and will be verified for authenticity utilizing criteria maintained in the PA database. In addition, these guidelines outline the processes used between the PA and:

- Code Holders
- Local Exchange Routing Guide (LERG) Assignees
- Block Holders
- The CO Code Administrator
- Number Portability Administration Centers (NPAC).

Thousand block pooling, in the context of these guidelines, allows for sharing of Central Office (CO) Codes (NXX Codes) among multiple SPs serving the same rate area. All ten thousand telephone numbers (TNs) within each NXX Code continue to be associated with the same rate area designation (i.e., V&H coordinates), but can be distributed among multiple SPs at the thousand block (NXX-X) level. Examples of uses for thousand blocks for which these guidelines apply include plain old telephone service (POTS), Centrex, Direct Inward Dialing (DID), wireless service, facsimile, and coin phones.

Where thousand block pooling has not been implemented, or is not in use by a SP, the SP shall continue to apply directly to the CO Code Administrator for numbering resources. Guidelines addressing the assignment of Central Office Codes (NXXs) are covered under the Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008). Six to nine months (see Section 6.0 below) prior to thousand block pooling participation, SPs that do not currently participate in thousand block pooling, will be required to utilize these guidelines. In addition, non-pooling SPs are obliged

¹ User Profiles will be contained in the industry data base, as documented in Section 5.1.1. A User Profile for SP authorized users will be used to distinguish one user from another. (See Appendix 5)

to provide forecast and other data pursuant to regulatory request.

These guidelines do not supersede appropriate North American Numbering Plan (NANP) area governmental or regulatory principles, procedures, and requirements.

2.0 Assumptions and Constraints

The development of these thousand block pooling administration guidelines is based on the following assumptions and constraints:

- 2.1 NANP resources, including those covered in these guidelines, are collectively administered by the FCC, state commissions and managed by the telecommunications industry with oversight by the regulatory authorities in areas served by the NANP. The decision to establish an industry inventory pool in any given location is a regulatory responsibility.
- 2.2 The PA will obtain the necessary SP documentation to establish and administer the industry inventory pool.
- 2.3 The NANP resources are considered a public resource and are not owned by the assignees or the PA. Consequently, the resources cannot be sold, brokered, bartered, or leased by the assignee for a fee or other consideration. If a resource is sold, brokered, bartered, or leased for a fee, the resource is subject to reclamation by the PA.
- 2.4 These administration guidelines apply only to the assignment of thousand blocks to Block Applicants providing service within specific rate areas:
 - a) where SP Location Routing Number (LRN) Local Number Portability (LNP) has been implemented; and
 - b) where thousand block pooling has been mandated by the appropriate regulatory body.
- 2.5 These guidelines were developed, as appropriate, around the recommendation of the North American Numbering Council (NANC)² that the North American Numbering Plan Administrator (NANPA) would perform the PA function.
- 2.6 NANP numbering resources shall be assigned to facilitate the most effective and efficient use of a finite numbering resource in order to prevent premature

² Letter dated July 30, 1999 from NANC Chairman to Chief Common Carrier Bureau, FCC.

exhaust of an NPA and delay the need to develop and implement costly new numbering plans. Efficient resource management and code conservation are necessary to stay the industry impacts of expanding the numbering resource (e.g., expansion from 10 to 11 or 12 digits). Impacts of NANP expansion include:

- a) customer impacts (e.g., dialing, telephone number (TN) changes to advertising and stationary, security systems, etc.);
- b) Customer Premise Equipment (CPE) modifications;
- c) domestic and international switching hardware and software modifications;
- d) operational support systems (OSS) modifications and/or upgrades; and
- e) reprogramming of non-telecommunications databases that contain TNs.

2.7 Block Applicants requesting resources from the industry inventory pool:

- a) must be licensed or certified to operate in the rate area, if required, and must demonstrate that all applicable regulatory approvals required to provide the service for which the thousand block is required have been obtained;
- b) shall contribute numbering resources to the industry inventory pool, in accordance with these guidelines and any regulatory directives;
- c) shall establish internal policies and practices that provide for the efficient use and assignment of TNs to end users. These policies and practices shall balance product specifications, market strategies and customer needs with conservation principles to ensure "best practices" in TN utilization.
- d) ~~shall~~ should attempt to assign TNs out of a given thousand block before making assignments out of another thousand block;
- e) shall minimize the use of TNs within thousand blocks for purposes other than subscriber assignments (e.g., test codes);
- f) shall be subject to audits to assure compliance with these guidelines, processes and principles (see Section 12.0); and
- g) will have a choice to initiate pooled block activation through Service Order Activation (SOA) interface to NPAC Service Management System (SMS) or through NPAC personnel.

- 2.8 The schedule of holidays recognized by the PA will affect the administration of these guidelines. Holidays will not be considered a "calendar day" as a part of any timing of thousand block allocations in association with these guidelines.
- 2.9 Audits of the PA and Block Applicants/holders will be performed by a designated neutral party, including state regulatory authorities, to:
- a) ensure uniformity in application of these guidelines by the PA to all thousand block requests received by the PA,
 - b) ensure compliance with these guidelines by Block Applicants and the PA, and
 - c) ensure the efficient and effective use of numbering resources by Block Applicants/holders and efficient and effective management of numbering resources by the PA.

3.0 Thousand Block Assignment Principles

The following assignment principles apply to all aspects of these guidelines:

- 3.1 Where thousand block pooling has been implemented, the PA will assign numbering resources in thousand block increments. Resources will be available for assignment from both contaminated and uncontaminated thousand blocks contained in the industry inventory pool. A contaminated thousand block is a thousand block of one thousand (X000-X999) TNs in which at least one TN is classified as one of the following:
- a) Administrative Number
 - b) Aging Number
 - c) Assigned Number
 - d) Reserved Number
- 3.2 A SP requirement for an entire NXX Code (i.e., 10,000 TNs) to satisfy the numbering needs for a single customer³ shall be obtained from the PA, not the CO Code Administrator (see Section 8.5).
- 3.3 Numbering resources in the industry inventory pool shall be available and allocated to SPs in a fair and non-discriminatory manner (i.e., on a first come, first served basis).
- 3.4 The information required of applicants for thousand block assignments shall

³ Single customer is defined as one customer requiring 10,000 consecutive TNs from one NXX.

be kept to a minimum and shall be uniform for all applicants. All information provided on the Thousand Block Application Forms, Part 1A and Part 1B will be considered confidential, except for selected information made available publicly, only for those fields that must be input to the Routing Data Base System (RDBS) and/or Business Rating Input Database System (BRIDS). The information placed in RDBS and/or BRIDS becomes public upon assignment of the thousand block in the appropriate rating and/or routing data base output [e.g., LERG and/or Terminating Point Master –(TPM)].

- 3.5 The PA will allocate a thousand block to a SP's single switch. The SP will be allowed to use intra-service provider ports to share that thousand block across their multiple switches in a rate area. The actual distribution of TNs from a shared thousand block will not be captured in the LERG.
- 3.6 Thousand block assignments will be made from NXX codes assigned and utilized within a single rate area. All SP switch rate area boundaries, which cover the same geographic area, will participate in a single industry inventory pool. If a single SP has a rate area with boundaries that cover a unique geographic area different than any other SP, that SP will participate in a separate industry inventory pool.
- 3.7 Any SP that is denied the assignment of one or more thousand blocks under these guidelines has the right to appeal that decision per Section 13.0.
- 3.8 The PA should accept and fulfill requests for specific thousand blocks of TNs if they are currently available for assignment from the industry inventory pool, subject to the criteria identified in Section 9.3.4, Item c).
- 3.9 A SP may exchange a thousand block with the PA, only if the requested thousand block and the exchanged thousand block are in the same rate area, are uncontaminated, and the requested thousand block is available for assignment.
- 3.10 SPs may not trade thousand blocks between themselves.
- 3.11 Thousand block assignment may be transferred between SPs if all of the following conditions are met:
 - a) all one thousand TNs are assigned and/or reserved for a single customer;
 - b) the customer has ported all one thousand TNs to another SP that is not the Block Holder; and
 - c) both SPs involved must mutually agree to the transfer of the thousand

block assignment (see Section 9.4).

4.0 Service Provider Responsibilities

SPs have many responsibilities in a thousand block pooling environment. These responsibilities vary depending on whether the SP is acting as a Code Holder, a LERG Assignee, a Block Applicant, or a Block Holder. These responsibilities are outlined below:

4.1 Code Holder Responsibilities

A Central Office (CO) Code Holder is an assignee of a full NXX code. CO Code Holders can either be thousand block pool participants or not. CO Code Holders who are thousand block pool participants shall:

- a) identify eligible thousand blocks for donation to the industry inventory pool upon initial establishment of the industry inventory pool pursuant to Section 8.1;
- e)b) update the LERG with the data on the thousand blocks within pooled NXX codes that are retained in its SP inventory at the time of initial establishment of the industry inventory pool. No LERG updates are required for NXX codes that do not have thousand blocks donated to the industry inventory pool; and
- c) become a LERG Assignee at the Block Donation Date (see Section 8.1).

4.2 LERG Assignee Responsibilities

4.2.1 A LERG Assignee is the SP listed as the entity associated at the NXX code level with a pooled NXX Code in the LERG and is responsible for default routing functions associated with the pooled NXX Code. The LERG Assignee shall:

- a) submit the appropriate CO Code request forms to the PA filled out as if the LERG assignee were requesting the CO code from the CO Code Administrator, with the appropriate information populated (e.g., Tandem Homing CLLI, Route/Rate Same as Information, Switching Entity/POI, etc.);
- e)b) submit the Part 1B - NPAC Block Holder Data form to the PA as appropriate;
- e)c) verify and test that the NXX Code is open prior to the NXX Code

Effective Date;

- g)d) provide blank and vacant code announcements for unallocated thousand blocks;
- h)e) maintain sufficient and auditable data to demonstrate compliance with these guidelines (see Section 12.0); and
- k)f) notify the PA if the LERG Assignee is no longer able to perform default LERG Assignee functions (e.g., the SP is no longer providing service in the area served by that NXX Code).
- h)g) confirm, prior to donating the thousand block to the industry inventory pool, that:
 - 1) all unavailable TNs within contaminated thousand blocks have been intra-service provider ported;
 - 2) the associated NPA/NXX is currently available for call routing, is opened for LNP in the LERG and the NPAC, and the NPA-NXX query triggers are applied in all switches and reflected in the appropriate network databases (e.g., STP routing tables);
 - 3) the NXX-assigned switch is currently LNP-capable and will process terminating traffic appropriately; and
 - 4) End Office Interconnection (EOI) trunking has been established between the NXX-assigned switch and other interconnecting networks.
- h) rely on the PA to fill out and submit Central Office Code (NXX) Assignment request and Confirmation Form (Part 4) in those circumstances where the LERG Assignee is not the recipient of a full NXX code.
- i) be responsible for providing the CO Code Part 4 (Assignment Request and Confirmation of Code In Service) to the PA to certify that the NXX obtained to meet a SP's single customer request for a full NXX Code has been placed in service when the LERG Assignee is the recipient of a full NXX Code. (Note: in this instance, the PA will forward the CO Code Part 4 form to the CO Code Administrator).

4.2.2 LERG Assignees cannot abdicate their responsibilities unless they can demonstrate to the PA that a technical or other inability to perform this function exists.

4.3 Block Applicant Responsibilities

Block Applicants, requesting resources from the industry inventory pool, shall:

- a) be licensed or certified to operate in the rate area, if required, and must demonstrate that all applicable regulatory approvals required to provide the service for which the thousand block is required have been obtained, and
- b) complete the Thousand Block Application Forms per these guidelines; and
- c) comply with any regulatory requirements relating to fill rates.

4.4 Block Holder Responsibilities

A Block Holder (or selected designee) shall:

- a) enter any necessary information into RDBS and BRIDS;
- b) arrange for the entry of any information to the LIDB or other carrier-specific databases due to receipt of a new thousand block;
- c) remove records from the LIDB, or other carrier-specific databases, for thousand blocks returned/donated to the industry inventory pool upon relinquishment of the thousand block (SPs that do not currently subscribe to LIDB need not add interfaces to or arrange for access to such databases);
- d) abide by the thousand block allocation and reclamation procedures outlined in Sections 9.0 and 10.0 and all regulatory requirements;
- e) provide forecasted thousand block requirements to the PA for projecting rate area exhaust and for input to the NPA code relief planning process;
- f) maintain sufficient and auditable data to demonstrate compliance with these guidelines (see Section 12.0);
- g) verify in the NPAC which TNs are assigned in any contaminated thousand block received from the PA to avoid duplicate TN assignments; and
- h) complete and return the Part 4 (Confirmation of NXX-X Block In Service) to the PA.

4.5 User Profile Application Responsibilities

Complete a User Profile Application that will be used to distinguish one user from another while using the PA system (*e.g., a User Profile will need to be set up prior to using the PA system*). *The User will be given a Password/ID for access to the PA system to protect individual SP sensitive data. (See Appendix 5 - Draft User Profile Application)*

5.0 Pool Administrator Responsibilities

The following describes the high level responsibilities of the PA in:

- 1) General Administration Duties
- 2) Forecasting and Planning Processes
- 3) Assignment Processes
- 4) Reporting Processes
- 5) Block Reclamation Processes
- 6) Audits

Detailed PA responsibilities are described in the appropriate process sections of these guidelines. The PA's activities shall be subject to review and oversight by the appropriate federal and/or state regulatory authorities.

5.1 General Administration Duties

- 5.1.1 The PA shall produce and make available, upon request, information regarding thousand block pooling administration processes, procedures, interfaces, and services. Additionally, the PA shall provide, upon request, of the thousand block pooling participant, information on how to obtain documents related to thousand block pooling administration. This can be accomplished by either referring the SP to web sites where it will be possible to download electronic copies, or by providing electronic copies via e-mail.

The PA shall:

- a) be responsible for activities associated with industry inventory pool establishment; -
- e)b) assure the availability, based upon industry established criteria, of numbering resources within the industry inventory pool for a given rate area;

- e)c) add to the resources in the industry inventory pool when necessary by requesting additional CO Codes from the CO Code Administrator;
- g)d) work with the CO Code Administrator and state commissions in the planning and implementation of NPA code relief (e.g., update the PA's industry database to reflect any changes resulting from NPA relief activity). For specific details, see NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016);
- i)e) provide copies of the Thousand Block (NXX-X) Pooling Administration Guidelines (INC 99-0127-023) when requested by Block Applicants, including timely notification of changes;
- k)f) assist the CO Code Administrator in analyzing and helping to resolve problems related to misrouted calls and calls that cannot be completed;
- m)g) track reported switch cut-overs and thousand block reassignments and perform other operational functions (e.g., thousand block reclamation);
- o)h) make available on their web site the PA-recognized holidays and distribute as necessary;
- q)i) log and track all thousand block applications using a tracking mechanism which will enable the PA and Block Applicant to identify a specific thousand block request; and
- s)j) build and maintain an industry data base which includes appropriate security for confidential data. The database will be accessible to all SPs and state commissions through an appropriate mechanism and will include:
 - 1) all pooled thousand blocks in the industry inventory pool (i.e., NPA-NXX-X level information displayed),
 - 2) status of the thousand blocks, i.e., allocated/assigned, available,
 - 3) identification of the SP to which the thousand block has been allocated whether or not a thousand block is contaminated,
 - 4) administer a User Profile Application process that will be used to distinguish one user from another while using the PA system (e.g., a User profile will need to be set up prior to using the PA system. The User Profile will contain the SP contact information, OCN.. Every SP that uses the system may need multiple unique User Profile.

The User will be given a Password/ID for access to the PA system to protect individual SP sensitive data.) (See Appendix 5 - Draft User Profile Application).

5.2 Forecasting and Planning Processes

The PA shall:

- b)a) compile demand forecasts of all SPs participating in thousand block pooling and generate a total forecast based on the SPs forecasts and utilization data obtained by the PA, NANPA or the state commissions, for the industry inventory pool;
- d)b) perform statistical analysis of the SP's forecasts to assure adequate numbering resources are available for the industry's use through timely replenishment of the industry inventory pool; and
- f)c) work cooperatively with the CO Code Administrator in determining when the numbering resources appear to be nearing exhaust .

5.3 Assignment Processes

The PA shall:

- a) receive all request(s) for thousand blocks from SPs who have certified the need for assignment and validate the request(s) to ensure each applicant meets the criteria to be a Block Holder;
- e)b) verify that the applicant has: (i) been certified by the state commission and have the necessary interconnection arrangements in place; and (ii) completed the appropriate forms containing all of the pertinent information such as OCN (Operating Company Number), AOCN (Administrative Operating Company Number), switch ID, Effective Date and Tandem ID;
- e)c) assist industry inventory pool participants, as necessary, with the completion of all thousand block pooling forms;
- g)d) attempt to satisfy all SP requests for specific thousand block(s) whenever possible, subject to the criteria identified in Section 9.3.4, item c);
- i)e) select the specific thousand block(s) for assignment, or provide the reason to the SP why the assignment cannot be made;

- k)f) be responsible for inputting necessary information into RDBS/BRIDS;
- m)g) respond to the applicant's request(s) within 7 calendar days following receipt of the request by issuing the Part 3 - Pool Administrator's Response/Confirmation form to the applicant; and
- k)h) request new NXX Codes from the CO Code Administrator to replenish the industry inventory pool in order to meet a SP's request for a specific thousand block due to technical reasons. This includes processing of expedited requests when needed.
- h)i) return CO Code Part 4 Assignment Request and Confirmation of Code In Service, to the CO Code Administration to certify that NXXs obtained by the LERG Assignee to replenish the industry inventory pool have been placed in service. The PA will complete and forward the Part 4 form confirmation when the first Block Holder Part 4 confirmation form for that NXX is received.

5.4 Reporting Processes

The PA shall:

- a) prepare and publish reports as required by the industry, the North American Numbering Plan Administrator (NANPA), and regulatory authorities using forecast reports for projected future number resource usage;
- b) treat SP specific data submitted to them as confidential;
- c) aggregate Block Holder forecast data and submit the aggregated data to the CO Code Administrator(s) and to the NANPA for use in applicable forecast studies; and only publish data that has been aggregated.

5.5 Block Reclamation Processes

The PA is responsible for ensuring that thousand blocks are reclaimed when necessary (see Section 10.0).

5.6 Audits

In the performance of its duties and in meeting its responsibilities, the PA may encounter situations that may alert them to a possible noncompliance with the industry guidelines which warrants the need for a for cause audit. In these situations, the PA will inform and forward relevant information which contains the details of the possible infraction to the designated auditor or

appropriate regulatory agency for disposition.

In addition, the PA may be required to provide SP specific data to an auditor or regulatory agency in order to facilitate the audit process.

6.0 Forecast Reporting Process

Thousand block forecast reports will be completed and submitted by SPs to the PA ~~annually~~ quarterly on January 1, April 1, July 1, and by October 1. ~~(This date coincides with the submission of utilization reports to NANPA).~~ This shall be consistent with the schedule for submission of forecast data for CO Code assignment. The data provided in these reports will allow the PA to aggregate the forecast data at the rate area level. This will also facilitate the comparison and analysis of the data by the PA.

In areas where thousand block pooling has been or is planned to be implemented, SPs that meet any one of the following criteria are not required to report CO Code forecast data at the thousand block level to the PA:

- Exempt from LNP, or
- Operate in a non-thousand block pooling area

Additionally, SPs utilizing switches incapable of participating in thousand block pooling in a thousand block pooling area do not have to report CO Code forecast data at the thousand block level for only those switches that are incapable of participating in thousand block pooling.

However, these SPs are expected to provide such data to the PA in a reasonable amount of time (e.g., 6 to 9 months) prior to when they are required to participate in thousand block pooling.

6.1 Forecast Process

- 6.1.1 All thousand block pooling participating SPs shall provide a forecast, on an quarterly ~~annual~~ basis, by rate area to the PA. The thousand block forecast is based on a ~~123~~-month interval. Forecast reports will be sent by SPs to the PA for all number resource requirements in thousand block pooling rate areas, including full NXX Codes as well as thousand blocks. The PA will adjust the Thousand Block Forecast Report (Appendix 1) during each quarterly ~~annual~~ collection period to reflect the year and quarters for which data should be submitted. The forecast is incremental above the quantity of thousand blocks already allocated in the SP inventory. The SP inventory consists of all geographic NANP TNs allocated by the CO Code

Administrator/PA to the Code/Block Holder. The PA normally adjusts the industry inventory pool at the 342- month forecast schedule.

- 6.1.2 If a SP identifies a significant change in its thousand block forecast, they shall provide an updated forecast as soon as possible to the PA. The updated forecast should also identify a SP's need for an entire NXX code(s) (identified in thousand blocks) to satisfy the need of a single customer. This updated forecast will completely replace the previous thousand block forecast for a given NPA.
- 6.1.3 The PA may require SPs to submit a thousand block forecast outside of the annual schedule. For example, a separate forecast may be required to establish an industry inventory pool. It is expected that this forecast would be for a limited thousand block pooling area (e.g., a rate area). The PA will notify all SPs participating in the thousand block pooling area of the request and provide a reasonable length of time for SP responses (i.e., one month or more).
- 6.1.4 If a SP submits an application for additional thousand blocks greater than that which had been previously forecasted, the SP could be temporarily restricted to their original forecasted amount to allow the PA sufficient time to replenish the industry inventory pool, when necessary, before the SP's application can be fulfilled. If satisfying these particular requests would result in a critical industry inventory insufficiency (see Section 11.2) in the industry inventory pool for a rate area, the PA may not meet the entire request.
- 6.1.5 A SP that has not submitted a thousand block forecast will not be provided thousand blocks from the industry inventory pool until the SP submits a forecast. In the event that the industry inventory pool has more than sufficient resources to meet the forecasts of other SPs, the PA may assign thousand blocks to a SP who has just submitted a forecast.. In the event that the industry inventory pool does not have more than sufficient resources to meet the forecasts of other SPs, the SP just now submitting the forecast will not be provided thousand blocks for a period of up to sixty-six (66) calendar days from the time the SP submitted the forecast. This 66 calendar day interval will allow the PA sufficient time to replenish the industry inventory pool when necessary. This process for addressing a SP that has not submitted a forecast is different in NPA jeopardy situations (see Section 11.0).

Information furnished by Block Holders shall be submitted on the Thousand Block Forecast Report form (Appendix 1) to the PA. Block Holder data will be used by the PA to develop a composite forecast for the thousand block pooling area. The PA will utilize the composite forecast to determine when additional thousand blocks are required for the industry inventory pool. The

composite forecast will be used in determining the critical industry inventory insufficiency within a specific rate area and will also be submitted by the PA to the CO Code Administrator for use by the NANPA in annual COCUS studies for projecting NPA exhaust. All forecast data will be treated by the PA in a confidential manner.

When the industry inventory pool is not adequate to meet participating SPs' forecasted thousand block demands, the PA will request additional NXX codes from the CO Code Administrator as outlined in Section 8.4.

6.2. Service Provider Reporting Requirements

The following are the SP reporting requirements⁴ for thousand block pooling:

- a) use the Thousand Block Forecast Report (proposed form in Appendix 1,) that will be available electronically on the PA Web site and will be populated with the rate area name as it appears in the LERG;
- b) SPs providing service in multiple NPAs must submit a separate electronic Thousand Block Forecast Report for each NPA; and
- c) submit the appropriate Thousand Block Months to Exhaust Certification Worksheet – TN Level (Appendix 3) and/or Thousand Block Months to Exhaust Certification Worksheet - Thousand Block Level (Appendix 4) with the Thousand Block Application Forms for thousand block requests.
- d) Block Holders to whom numbering resources are assigned shall be responsible to report the name and contact information to NANPA of any reseller/type 1 wireless carriers who have obtained numbering resources of more than 1,000 numbers per NXX. The reseller/type 1 wireless carriers shall then be responsible to report their forecast data to the NANPA directly unless otherwise specified in an interconnection agreement, business agreement, contract or tariff.⁵

6.3 Penalties

Any SP which forecasts demand 30 percent or more above its actual utilization for three or more quarters may be subject to penalties, including restricted access to numbering resources, as determined by the appropriate state commission.

⁵ Per GS-161, memo from NANC Chairman to INC Moderator, logged in on November 8, 1999.

7.0 Reservations of Thousand Blocks for Service Providers

SPs may have reason to reserve thousand blocks for their future use. This section outlines the processes for thousand block reservations.

7.1 Criteria for Approval

To reserve a thousand block, the applicant must demonstrate that the thousand block is essential to accommodate a technical (e.g., switch, network element) limitation, planning constraint, or pending regulatory approval of a tariff and/or certification/registration. When the applicant has provided a proposed use date within 6 months, if regulatory approval is pending, the applicant must certify and provide, if requested, appropriate documentation that a request for regulatory certification/registration has been submitted to the appropriate regulatory body to provide service. The applicant must also meet other applicable requirements for thousand block assignment as outlined in Sections 2.0, 3.0, 4.0 and 9.0.

Specific thousand blocks cannot be reserved to satisfy applicant requests for vanity numbers.

7.2 Time Frames and Extensions

If a reserved thousand block is not assigned within six months, the thousand block will be released from reservation by the PA and returned to the industry inventory pool. Reservations may be extended when either of the following circumstances occurs:

- a) the proposed thousand block Effective Date will be missed due to extenuating circumstances (e.g., hardware/software provision delays, regulatory delays, etc.). Upon written request to the PA, one reservation extension of 3 months may be granted, or
- b) the reservation extension requirement was due solely to technical constraints (e.g., equipment limitations). Upon written request to the PA, the reservation may be extended until the constraint is no longer present.

8.0 Industry Inventory Pool

The objective of the industry inventory pool is to maintain sufficient thousand blocks for a 69-month inventory. The quantity of these thousand blocks

should be determined by the PA based upon:

- a) the number of SPs participating in a given rate area;
- b) the individual forecasts provided by each of the thousand block pooling participants;
- c) the anticipated rate of assignment of the thousand blocks within the industry inventory pool; and
- d) a minimum inventory of at least ~~six~~three months in the industry inventory pool at all times.

8.1 Outline of the Process for Establishment of Thousand Block Pooling Implementation Timeline (Figure 1).

Upon regulatory direction, the PA will obtain a list of SPs that have LNP capable switches in the geographic area where thousand block pooling is to be implemented. The PA will then schedule a First Implementation Meeting and assure that the SPs are aware of their requirement to participate in thousand block pooling and encourage their attendance and participation.

The PA will then draft the Thousand Block Pooling Implementation Timeline, with input from the state commission, identifying the milestones that SPs will be required to meet in order to implement thousand block pooling by the Mandated Implementation Date.

The PA and state commission, with input from participating SPs, will determine the dates of the milestones on a timeline for thousand block pooling implementation. ~~These dates should be based on the directives provided by the regulatory body and input from participating SPs.~~ The timeline should include the following, as depicted in Figure 1:

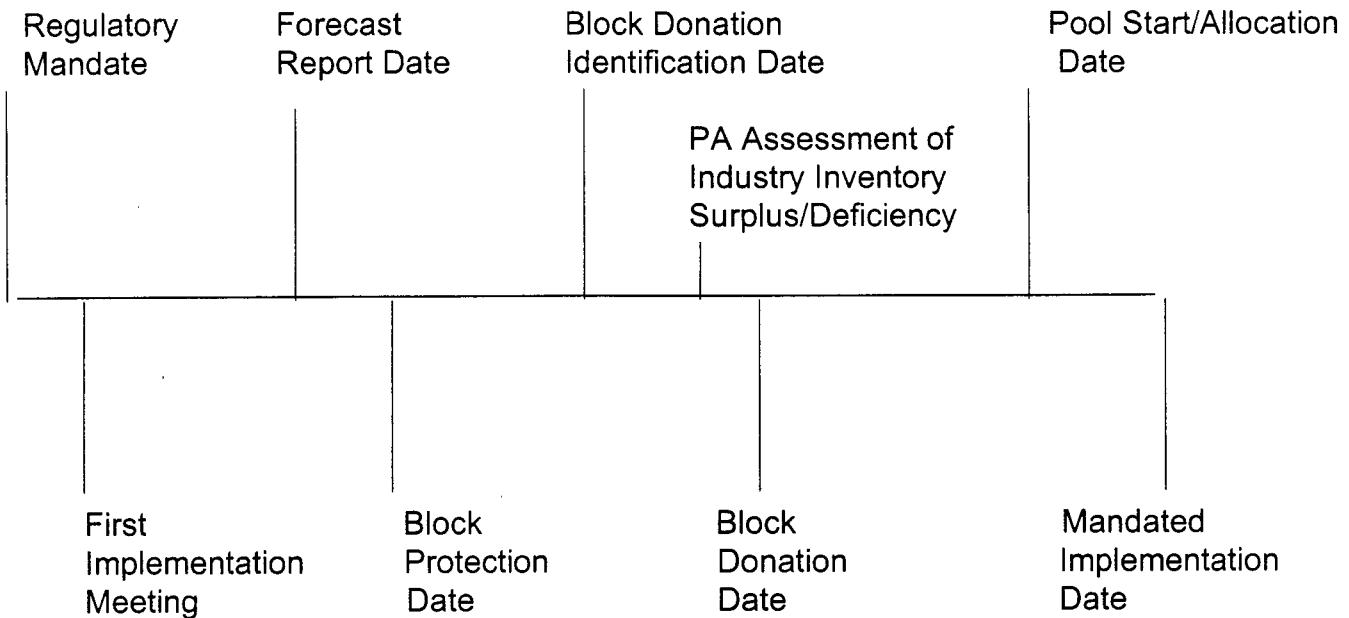
- a) Regulatory Mandate - The date of regulatory notification that thousand block pooling is to be implemented.
- b) First Implementation Meeting - The meeting held by the PA for all participating SPs to develop the time intervals between the milestones.
- c) Forecast Report Date - The deadline for SPs to report their forecasted thousand block demand.
- d) Block Protection Date - The deadline for SPs to "protect" specified

thousand blocks (those with up to 10% contamination) from further contamination.

- e) Block Donation Identification Date - The deadline for SPs to report their surplus/deficiency of thousand blocks to the PA.
- f) PA Assessment of Industry Inventory Pool Surplus/Deficiency - The deadline for the PA to aggregate and evaluate SP thousand block donation information and determine, on a rate area basis, whether there is a surplus of thousand blocks or whether an additional NXX code(s) is required to establish the 69 month inventory. The time interval for this activity should be established at the First Implementation Meeting.
- g) Block Donation Date - The deadline for SPs to donate their thousand blocks.
- h) Pool Start/Allocation Date - The date the PA may start allocating thousand blocks from the industry inventory pool to SPs. This is also the start date for SPs to send requests for thousand blocks to the PA.
- i) Mandated Implementation Date - The date identified by the appropriate regulatory body by which thousand block pooling is to be implemented.

Figure 1

PROCESS FOR ESTABLISHMENT OF THE THOUSAND BLOCK POOLING IMPLEMENTATION TIMELINE



8.2 Details of Thousand Block Pooling Timeline Milestones

8.2.1 Regulatory Mandate

The date of regulatory notification that thousand block pooling is to be implemented.

8.2.2. First Implementation Meeting

The PA is required to hold one public meeting with all SPs expected to participate in thousand block pooling. Additional meetings may be scheduled if necessary. The purpose of this meeting is to develop, by industry consensus, the intervals between the milestones of the timeline in order to finalize the Establishment of the Thousand Block Implementation Timeline (Figure 1). SPs will be informed of the requirements for thousand block pooling (including both initial and subsequent forecast reports, thousand block protection, thousand block donation, etc.) and will have the opportunity to ask clarification questions regarding this process.

~~When scheduling the First Implementation Meetings, the PA should give priority to: are to be scheduled by the PA with the understanding that the dates should be consistent with the yet to be established national thousand block pooling implementation roll out process. First Implementation Meetings could be scheduled, for example, on the following basis:~~

- multiple NPAs/multiple industry inventory pools with the same rollout schedule,
- multiple NPAs/single industry inventory pool,
- single NPA/multiple industry inventory pools with the same rollout schedule,
- single NPA/single industry inventory pool.

The PA will arrange for the First Implementation Meeting location and date, and notify potential attendees of the arrangements. This notification will also include the required meeting fee, if necessary, to cover meeting costs. If a SP in the designated area wishes to host the meeting, they should contact the PA and meeting costs may be optional. The PA will be exempt from paying meeting fees to attend First Implementation Meetings, but will be responsible for meeting notification, arrangements, facilitation, and documenting and distribution of meeting summaries.

8.2.3 Forecast Report Date

The deadline for SPs to report their forecasted thousand block demand. In addition to the standard schedule for reporting annual forecast data, an interim submission may be required in order to establish the industry inventory pool.

8.2.4 Block Protection Date

SPs are required to protect thousand blocks with 0% to 10% contamination from further contamination after the Block Protection Date, unless the SP does not have adequate supply in their inventory to fill customer requests (this does not include a request by a customer for a vanity number). The time interval from when SPs protect thousand blocks (Block Protection Date) to when they identify thousand blocks for donation to the PA (Block Donation Identification Date) requires considerable verification work by SPs so that all available TNs are identified (see Section 8.2.6). The length of this interval should depend upon the quantity of contaminated thousand blocks to be donated.

8.2.5 Block Donation Identification Date

SPs will identify to the PA which thousand blocks, if any, have no more than 10% contamination (including zero percent). The SP should also provide a summary, by rate area, whether they will have a surplus or deficiency of thousand blocks in their inventory, so the PA can determine the aggregate supply or deficiency of the industry inventory pool. At this point, the SP will specify which thousand blocks will be donated. The summary should also include the thousand block donor contact information, NPA-NXX-X range, and whether or not the donated thousand block is contaminated.

SPs may retain thousand blocks if they can certify that:

- a) the thousand blocks are required to meet the SP's 69-month projected forecast beyond the Pool Start /Allocation Date, or
- b) if it is technically impossible to provide service without the block there are technical reasons which justify retaining the thousand blocks.

Retention of these thousand blocks is subject to an audit(s) by the designated auditor (see Section 12.0) and to appropriate appeal procedures (see Section 13.0).

8.2.6 PA Assessment of Industry Inventory Surplus/Deficiency

For each thousand block pooling area, the PA will evaluate whether there will be enough thousand blocks donated to create an industry inventory pool with enough supply to meet the aggregate forecasted demand for TNs for 69 months beyond the Pool Start/Allocation Date. If the PA believes there will be insufficient supply to meet this demand, the PA will request additional NXX codes from the CO Code Administrator in an expedited manner to assure adequate supply exists prior to the Pool Start/Allocation Date (see Section 8.3.2, Step 2 for the process to select a LERG Assignee). If the PA determines there is an excess supply beyond the 69-month inventory level, any full NXX Codes in excess will be returned to the CO Code Administrator. Any excess individual thousand blocks will be kept in the industry inventory pool.

SPs are required to verify available TNs in thousand blocks which they intend to donate to assure they are not assigned in switches, billing systems, etc. The SP will complete intra-service provider ports on unavailable TNs in contaminated blocks which they are donating, including TNs assigned to resellers, Type 1 providers, etc., by the Block Donation Date. The porting of unavailable TNs in contaminated blocks in advance of the Pool Start/Allocation Date will allow the recipient Block Holder the ability to

determine which TNs are unavailable upon allocation of the thousand block.

In addition, SPs will ensure that all donated thousand blocks are within NXXs that have been opened for LNP in the LERG and the NPAC, and that the associated (donor) switch(es) are LNP-capable and ready to process terminating traffic. The donated thousand blocks shall be ready for allocation and use on the Pool Start/Allocation Date.

8.2.7 Block Donation Date

SPs are required to donate protected thousand blocks (see Section 8.2.4) at the Block Donation Date. Intra-SP porting of all unavailable TNs within all thousand blocks that are being donated to the industry inventory pool by SPs is to be completed by the Block Donation Date. SPs will document to the PA that activities required in the thousand block donation phase have occurred. SPs should not donate any thousand blocks which will be required to maintain their inventory for ~~69~~ months beyond the Pool Start/Allocation Date. Additionally, SPs are required to have updated the LERG with information on thousand blocks within pooled NXX Codes which are not donated (i.e., those thousand blocks within pooled NXX Codes that will be retained by the donating SP). The PA shall notify the CO Code Administrator of the NXX Codes for which the thousand block pooling indicator must be set on the Assigned Code Record (ACD) record in RDBS/BRIDS.

Prior to donating the thousand block(s)/NXX code(s) to the industry inventory pool, SPs must confirm that:

- a) all unavailable TNs within contaminated thousand block(s)/NXX(s) have been intra-service provider ported;
- b) the associated NPA/NXX is currently available for call routing and is opened for LNP in the LERG and the NPAC, and the NPA-NXX query triggers are applied in all switches and reflected in the appropriate network databases (e.g., STP routing tables);
- c) the NXX-assigned switch is currently LNP-capable and will process terminating traffic appropriately; and
- d) End Office Interconnection (EOI) trunking has been established between the NXX-assigned switch and other interconnecting networks.

The normal interval between the Block Donation Identification Date and the Block Donation Date is 66 days which allows for CO Code activation to populate the industry inventory pool if needed. Any deviation from the 66 days will be determined by the state commission with input from the industry

industry consensus; under most circumstances in no case will the interval will not be less than 30 days.

If a pending LNP port exists for an unavailable TN(s) within a contaminated thousand block that is being donated, the two SPs involved in the LNP port must work cooperatively to resolve the pending port. This process could be accomplished by having the recipient SP of the LNP port, cancel the pending LNP port so that the donating SP can perform the intra-SP port for thousand block donation purposes. Afterwards, the recipient SP of the LNP port, would then re-establish the pending LNP port. Another alternative would be to have the SPs involved attempt to advance the pending LNP port through contact with the NPAC.

The quantity of pending LNP ports (not intra-SP ports) that must be addressed should be considered by the industry when establishing the overall schedule for thousand block donation. A large quantity of pending LNP ports may require a longer interval between the Block Donation Identification Date and Block Donation Date. This information may not be available at the First Implementation Meeting.

Failure to address all pending ports at the time of thousand block donation will result in a rejection of the NPAC activation when that thousand block is subsequently allocated to an SP following industry inventory pool establishment.

8.2.8 Pool Start/Allocation Date

The date the PA may start allocating thousand blocks from the industry inventory pool to SPs. This is also the start date for SPs to send requests for thousand blocks to the PA. The Pool Start/Allocation Date may be as few as 2 days following the Block Donation Date. The 2 days is necessary to allow the NPAC download of intra-SP ports to occur. The Pool Start/Allocation Date may also be established beyond 2 days, depending on local circumstances.

8.2.9 Mandated Implementation Date

The date identified by the appropriate regulatory body by which thousand block pooling is to be implemented.

8.3 Ongoing Industry Inventory Pool Administration

Should a rate area be altered (e.g., consolidated, boundary change) after a thousand block pooling environment has been established, the PA will select

the necessary implementation milestones from those outlined in the Establishment of the Thousand Block Pooling Implementation Timeline (see Section 8.1) to effect the required change to the industry inventory pool.

The size of the industry inventory pool will be a 69-month supply for each rate area. The SP's inventory for each rate area may be up to a 69-month supply.

Examples:

- If an NPA Overlay conforms exactly to the existing NPAs geographic area, the existing industry inventory pools should not require that any additional thousand block pooling implementation milestones be identified by the PA, nor should it be treated as a separate industry inventory pool from the existing industry inventory pool.
- Rate Center Consolidation (RCC) may require that some milestones outlined in Section 8.1 be identified to re-size the industry inventory pool. The necessary milestones for the PA to identify will be dependent on the specific characteristics of each thousand block pooling area and the requirements needed to modify the existing industry inventory pool.

8.4 Replenishment of the Industry Inventory Pool

8.4.1 The PA shall monitor the supply of available thousand blocks in the industry inventory pool for each of the rate areas being administered. This includes, but is not limited to, anticipating the demand upon the industry inventory pool, replenishing the supply based on thousand block forecasts, and meeting SP requests for thousand blocks that cannot be filled from available thousand blocks in the industry inventory pool.

SPs will not be required to donate contaminated thousand blocks for ongoing replenishment of the industry inventory pool.

8.4.2 New NXX codes will be used to replenish the industry inventory pool after the initial industry inventory pool has been established. Thousand blocks reclaimed by the PA will also be used to replenish the industry inventory pool. SPs may also voluntarily return any resources to assist in the replenishment of the industry inventory pool, including any resources in SP's inventory within thousand block pooling rate areas, from both embedded resources as well as thousand blocks allocated to an SP by the PA. SPs should first return all uncontaminated thousand blocks before returning any contaminated thousand blocks for industry inventory pool replenishment. For reclamation procedures, see Section 10.0.

8.4.3 Prior to requesting a new NXX code(s) from the CO Code Administrator to replenish the industry inventory pool, the PA could request SPs to voluntarily return any uncontaminated thousand blocks or uncontaminated NXX Codes within their SP inventories which are not required based on their 69 month inventory forecast.

Prior to donating the thousand block(s)/NXX code(s) to the industry inventory pool, SPs must confirm that:

- a) all unavailable TNs within contaminated thousand block(s)/NXX(s) have been intra-service provider ported;
- b) the associated NPA/NXX is currently available for call routing and is opened for LNP in the LERG and the NPAC, and the NPA-NXX query triggers are applied in all switches and reflected in the appropriate network databases (e.g., STP routing tables);
- c) the NXX-assigned switch is currently LNP-capable and will process terminating traffic appropriately; and
- d) End Office Interconnection (EOI) trunking has been established between the NXX-assigned switch and other interconnecting networks.

8.4.4 The following steps provide the process flow and activation procedures for the addition of central office codes in order to provide additional thousand blocks to the industry inventory pool to meet immediate or forecast demand:

Step 1 - The PA utilizes SPs' forecasts to determine that additional thousand blocks are required to maintain a 69-month supply for the industry inventory pool for a specific rate area. Additionally, the PA may require new NXX Codes to replenish the industry inventory pool to meet an SP's request that cannot be filled from thousand blocks available in the industry inventory pool.

Step 2 - The PA selects a LERG Assignee for growth codes to be added to the industry inventory pool. The LERG Assignee receives a thousand block(s) from the NXX assigned. If the LERG Assignee requires the assignment of an LRN, the LERG Assignee shall select the LRN from its assigned thousand block(s). If a request is for a customer dedicated NXX code, the requesting SP will be the LERG Assignee. The PA will follow the order below to select a LERG Assignee:

1. A SP requiring an LRN.
- ~~3-2.~~ A SP volunteering to be the LERG Assignee.

5.3. A SP on a rotating basis, until all participating SPs are the LERG Assignee for at least one NXX Code residing within the industry inventory pool.

7.4. After each participating SP is a LERG Assignee for at least one NXX Code, participating SPs with a forecasted need will be selected on a rotational basis. An SP with a forecasted need cannot refuse to become a LERG Assignee, except for technical limitations, or if any SP is a LERG Assignee for greater than 50% of the pooled NXX Codes within that rate area.

Step 3 - The LERG Assignee, designated in Step 2, is responsible for completing the Central Office Code (NXX) Assignment Request - Part 1 form and submitting it to the PA. The PA will then forward the Part 1 to the CO Code Administrator. The LERG Assignee is also responsible for submitting the Thousand Block Application Forms - Part 1B to the PA for those thousand blocks which will be assigned to them.

The LERG Assignee shall also include the names of both the PA and the LERG Assignee on the Central Office Code (NXX) Assignment Request - Part 1 form (Code Applicant section) so that the CO Code Administrator can provide a Part 3 response directly to both the PA and the LERG Assignee. Where the LERG Assignee has requested a dedicated NXX Code to meet a specific customer request, the LERG Assignee is responsible for completing the Thousand Block Months to Exhaust Certification Worksheet - TN Level (Appendix 3) and submitting it to the PA. The LERG Assignee, or its designate, is also responsible for inputting the RDBS/BRIDS information for the NXX Code assigned.

When the PA is unable to fill a SP thousand block application, the PA will select a LERG Assignee per Step 2, request the LERG Assignee to fill out a Central Office Code (NXX) Assignment Request - Part 1 form and return it to the PA who will forward it to the CO Code Administrator. This must be initiated within two business days. Included in the request will be the selected LERG Assignee and Effective Date.

Step 4 - The CO Code Administrator reviews the Central Office Code (NXX) Assignment Request - Part 1 form and, within 14 calendar days, notifies the PA of the NXX Code(s) assignment.

Step 5 - The CO Code Administrator inputs LERG Assignee information into the ACD record of RDBS, using Central Office Code (NXX) Assignment Request - Part 1 form data (NPA, NXX, OCN, and Effective Date.).

Step 6 - Within seven (7) calendar days upon receipt of the NXX Code assignment from the CO Code Administrator, the PA informs the LERG Assignee of the NXX Code and thousand block(s) assigned using the Thousand Block Application Forms, Part 3 – Pool Administrator's Response/Confirmation. During this step, the PA will also build the BCD record for thousand block(s) being allocated to the LERG Assignee. The information entered on the BCD record will include OCN of the Block Holder, AOCN, the thousand block range, switch ID and thousand block Effective Date. The Effective Date for all thousand block(s) assigned to the LERG Assignee will be the same as the Effective Date of the CO Code.

Step 7 - Within seven (7) calendar days of notification by the CO Code Administrator, the LERG Assignee, or its designee, inputs Part 2 information from the Central Office Code (NXX) Assignment Request into RDBS and BRIDS.

8.5 Pool Administrator's Responsibilities When Requesting CO Codes

8.5.1 The PA, when applying to the CO Code Administrator for additional NXX Codes for industry inventory pool growth, will certify that existing thousand blocks for the rate area will exhaust within 69 months and will have documented and supply supporting data. The PA, when applying to the CO Code Administrator to meet a SP's request for a specific thousand block due to technical reasons, will provide supporting documentation as to the technical constraint as provided by the SP.

8.5.2 The PA, when forwarding the LERG Assignee's application to the CO Code Administrator for additional NXX Codes for the industry inventory pool, will attach aggregated industry inventory pool data supporting the application in order to meet the Months to Exhaust Worksheet requirement for a CO Code assignment. The aggregated data should include:

- growth history of thousand blocks, or equivalent information, for the past 69 months,
- thousand blocks available for assignment, and
- projected demand for thousand blocks in the next 69 months

8.5.3 The PA, when applying to the CO Code Administrator for an NXX Code to a) satisfy the needs of a SP's single customer requiring 10,000 consecutive TNs or b) be assigned for LRN purposes, will forward the Thousand Block Months To Exhaust Certification Worksheet - TN Level (Appendix 3) that is supplied to the PA by the requesting SP and covers:

- a) TNs available for assignment;
- b) incremental growth history of new TNs for the past 69 months (does not include ported-in TNs); and
- c) projected incremental demand for TNs in the next 69-months.

The PA must forward this Thousand Block Months to Exhaust Certification Worksheet – TN Level (Appendix 3) information to the CO Code Administrator.

The PA will forward the CO Code Part 4 form to the CO Code Administrator. The SP to whom the NXX has been assigned is responsible for providing the CO Code Part 4 (Assignment Request and Confirmation of Code In Service) to the PA to certify that the NXX obtained to meet a SP's single customer request for a full NXX Code has been placed in service.

9.0 Allocation of Thousand Blocks

9.1 Criteria for Thousand Block Allocation

The following criteria shall be used by the PA in reviewing a thousand block request from a SP:

- a) requests for thousand block assignments shall not be made more than 69 months prior to the requested Effective Date;
- b) the applicant must be licensed or certified to operate in the rate area, if required, and must demonstrate that all applicable regulatory approvals required to provide the service for which the thousand block is required have been obtained;
- c) the applicant must certify a need for a thousand block(s);
- d) multiple thousand blocks may be requested on one Thousand Block Applications Forms - Part 1A - General Application Information form. The Part 1A application form is structured per switch, per rate area;
- e) a separate Thousand Block Applications Form - Part 1B - NPAC Block Holder Data form must be submitted for each thousand block requested;
- f) the applicant should have requested their own contaminated thousand block from the industry inventory pool;

- g) the SP could have refused the assignment of a thousand block when it did not meet their technical limitations and/or administrative constraints;
- h) thousand blocks shall not be allocated to satisfy requests for vanity TNs; and
- i) the applicant has provided the required forecast information in order to be assigned a thousand block (see Section 6.0).

9.2 Application Process

- 9.2.1 The applicants for thousand block assignments shall submit their requests to the PA using the electronic Thousand Block Application Forms found on the PA Web site or via an interface by Electronic File Transfer (EFT) . No requests and/or form submission will be accepted via fax, paper, voice, or e-mail, except in extraordinary circumstances and/or previously agreed to by the PA. Where the applicant requires the assignment of a full NXX code, the applicant should so indicate on the Thousand Block Application Forms, Part 1A. Electronic transfer or e-mail will be accepted as "official signature."
- 9.2.2 The applicant should indicate on the Thousand Block Application Forms – Part 1A – General Application Information form, if any thousand block (i.e., 0-9) is acceptable or whether for technical limitations and/or administrative reasons, only certain thousand blocks may be assigned to them. Specific thousand blocks may be requested on the application. The applicant may also indicate a requirement, or a preference, for sequential numbering resources.
- 9.2.3 The PA receives the thousand block request (Thousand Block Application Forms, Parts 1A and 1B) from the SP and the Thousand Block Months to Exhaust Certification Worksheet – TN Level (Appendix 3). Additional information and/or dialogue may be required by the PA with the applicant to facilitate application processing. The PA is required to respond to the applicant within seven (7) calendar days of receipt of the request.
- 9.2.4 Applicants requiring an Effective Date more than 28 days after the date the PA receives the application should specify their desired Effective Date. An application without an Effective Date will be assigned the standard PA-assigned minimum Effective Date of 19 days after the Allocation Date. The PA shall always assure a minimum of 19 days between the Allocation Date and the Effective Date, unless requested otherwise through the expedite process (see Section 9.6).

SPs must allow at least two days beyond the Effective Date prior to activating TNs within the assigned thousand block. For example, if the Effective Date is

October 28, XXXX, a SP can start assigning TNs on October 30, XXXX. This is necessary in order to allow for NPAC processing and downloading to occur.

This 21 calendar day interval (i.e., from thousand block allocation through completion of NPAC processing) is necessary because of some SP's internal company notification processes, etc. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a thousand block. Such arrangements are outside the scope of these guidelines.

9.3 Process for Allocation of Thousand Blocks

9.3.1 One process involves the initial allocation of thousand block(s) to a SP without numbering resources in a rate area.

A SP entering an established industry inventory pool with no numbering resources within the rate area is required to provide the PA a thousand block forecast prior to the allocation of a thousand block(s) as detailed in Section 6.0. The PA will allocate the appropriate quantity of thousand blocks to the new SP based on its request as detailed in Section 5.2 and Section 5.3. The PA ~~shall~~ may review ~~the~~ any application for reasonableness and request additional information from the applicant as necessary.

9.3.2 Another process involves the initial allocation of thousand blocks from the industry inventory pool to a SP with numbering resources in a rate area

A SP entering an established industry inventory pool, who has numbering resources within the rate area will, prior to requesting numbering resources from the industry inventory pool:

- a) provide a thousand block forecast, and
- b) donate thousand blocks to the industry inventory pool as outlined in Section 8.0.

9.3.3 The start-up need for an initial thousand block assignment will be based upon one of the following:

- a) identification of a new switching entity, or
- b) identification of a new physical point of interconnection (POI), or
- c) a specific business requirement.

If the applicant is deploying a new switching entity/POI that requires the assignment of an LRN, the Block Applicant will indicate on the Thousand Block Application Forms - Part 1A - General Application Information form, the need for assignment of a new NXX Code. In this case, the requesting SP becomes the LERG Assignee. In instances where the applicant does not designate a particular rate area for LRN assignment purposes, the PA should recommend and gain the SP's concurrence regarding which rate area should be used for assignment of an NXX Code and ensure efficient utilization of numbering resources.

9.3.4 For growth thousand block allocations, the following applicable criteria shall be used by the PA in reviewing a thousand block request from a SP:

a) The applicant must certify that existing numbering resources for the switching entity/POI will exhaust within 69 months. The quantitative information required for a growth thousand block(s) request is on the Thousand Blocks Months to Exhaust Certification Worksheet - TN Level (Appendix 3). The thousand block applicant should retain a copy in the event of an audit or regulatory initiative. In addition, the applicant must supply the Thousand Block Months to Exhaust Certification Worksheet and additional supporting information to the PA including:

- 2)1) TNs available for assignment,
- 4)2) incremental growth history of new TNs for the past 69 months, and
- 6)3) projected incremental demand for new TNs in the next 69 months.

b) The applicant certifies that an additional thousand block(s) is necessary when currently allocated TNs/thousand blocks cannot be utilized because of a technical limitation or administrative constraint. Some examples of the technical limitation or constraint are limitations on Customer Premise Equipment (CPE), SP internal thousand block administration restrictions (e.g., administration of a thousand block across multiple switches within a rate area), and potential situations such as unique AIN triggers. The applicant must specify the specific limitation and provide supporting documentation.

c) Unless the applicant requests a specific thousand block, the PA should select the thousand block for assignment based upon the following order:

- 1) the SP's donated contaminated thousand blocks,
- 2) other contaminated blocks,

- 3) SP donated, uncontaminated thousand blocks (first attempting to use the 0,1,8, and 9 thousand block),
 - 4) other available uncontaminated thousand blocks (first attempting to use the 0,1,8, and 9 thousand block).
- d) When the applicant requests a specific thousand block (NXX-X), the PA should assign the requested thousand block if available in the industry inventory pool. If not, the PA should follow the procedure outlined in c) above.
- 9.3.5 The PA is responsible for creating the BCD record in RDBS/BRIDS with the required thousand block information. Required thousand block information includes the following data elements: OCN of the Block Holder, AOCN, the thousand block line range, switch ID and block Effective Date. The BCD record will also display the rate area of the assigned NXX code as shown on the NXX ACD record. The rate area information is for informational purposes only for the PA .
- 9.3.6 The PA issues the Part 3 - Pool Administrator's Response/Confirmation form to the SP and issues the Part 1B, NPAC Block Holder Data form, to the NPAC as confirmation of thousand block allocation, except when the thousand block is being allocated back to the LERG Assignee and is going back to the donating switch. The NPAC will create the NPA-NXX-X Holder Information Table within seven (7) calendar days of notification for all thousand blocks allocated to SPs, . except when the thousand block is being allocated back to the LERG Assignee and it is going back to the donating switch.
- 9.3.7 When a contaminated thousand block is allocated, the PA will notify the thousand block applicant that the allocated thousand block(s) is contaminated. The thousand block applicant is responsible for obtaining a list from the LNP data bases of unavailable TNs within the contaminated thousand block that are not available for the thousand block applicant's use.
- 9.3.8 Should the NPAC experience any problem with the initial activation of an allocated thousand block (e.g., if all pending ports have not been addressed), the NPAC will notify the PA before attempting to perform subsequent thousand block creation. In the event all pending ports have not been addressed and is the cause for rejection, the PA will contact the LERG Assignee (i.e., the Block Donor) to take steps to resolve any pending ports that were not addressed during thousand block donation. The LERG Assignee will resolve the issue and provide notification back to the PA within five (5) business days of being contacted by the PA.

9.3.9 In instances where a pooled unavailable TN is assigned to more than one customer served by different SPs (i.e., Block Holder and LERG Assignee) due to an error made by the LERG Assignee in the population of unavailable TNs in the LNP data base at the time of donation, the customer of the original SP (i.e., the customer to whom the TN was originally assigned) shall retain assignment of the TN. The Block Holder shall assign their customer a new TN.

9.3.10 A thousand block assigned to a SP ~~shall~~ should be placed in service within ~~69~~ months after the date the thousand block was allocated by the PA to the SP. Certification of in service will be required. If the PA does not receive the Part 4 – Confirmation of NXX-X Block In Service within the ~~69~~ month interval, the PA should begin the reclamation process (see Section 10.0). If the SP identifies that they will not meet the ~~69~~ month deadline due to circumstances beyond their control, the SP may request an extension as defined in Section 10.3.

9.4 Thousand Block Transfer Process

Assignment criteria can be used by the PA when reviewing a request from a SP to transfer a thousand block from the current Block Holder to the SP making the transfer request. These criteria will apply when the transfer of a thousand block has been made from one SP to another SP and the full thousand block is assigned and/or reserved to a single end user customer.

All time intervals applicable to the assignment of a new thousand block apply in the case of a thousand block transfer. These intervals do not address the time intervals needed to perform the network and other rearrangements associated with the thousand block transfer.

9.4.1 The following criteria will be used by the PA in reviewing a thousand block transfer request:

- a) The applicant (SP receiving the thousand block to be transferred) must submit a complete Thousand Block Application Forms - Part 1A and Part 1B. In addition, the applicant requesting the thousand block transfer must also provide written certification in which the current Block Holder agrees to the transfer.
- b) Upon confirmation from both parties, the PA will modify the BCD record in RDBS/BRIDS for the thousand block to be transferred to reflect the OCN, Effective Date and AOCN of the SP to which the thousand block will be transferred. To the extent necessary, the PA will coordinate the change

with Traffic Routing Administration (TRA).

- c) The PA will notify the recipient SP when the BCD record has been successfully modified. It is the responsibility of the SP receiving the thousand block to enter, or arrange for the entry of, any changes to RDBS and BRIDS data (e.g., switch ID) associated with transferring the thousand block.

9.5 Ongoing Administration of Allocated Thousand Blocks and Notification of LERG Changes

9.5.1 The information associated with a thousand block assignment may change over time. The PA must be notified of an OCN or Block Effective Date change for thousand blocks which have already been assigned. Changes should be made as submitted by SPs on the Thousand Block Application Forms, Part 1A & Part 1B, to indicate the information to be updated. For data integrity reasons, the PA must be informed of these types of changes to ensure that the record of the entity responsible for the thousand block and the data associated with the thousand block is accurate.

9.5.2 After the PA has created the thousand block record on the BCD screen, but prior to the thousand block Effective Date, the PA, upon notification by the SP, as noted in 9.5.1, is responsible for making changes to any fields on the BCD screen, including Switch ID. If changes are made to the Switch ID field after the thousand block Effective Date, it is the Block Holder's option whether or not to update the Switch ID in the LERG.

9.5.3 The resulting SP in a merger/acquisition must revise and provide a new, consolidated forecast for numbering resources. The holder of a thousand block assigned by the PA or acquired by other means such as transfer (e.g., by merger or acquisition), must use the thousand block consistent with these guidelines. Additionally, the new Block Holder must participate in an audit process as necessary.

9.6 Expedite Process for Thousand Block Allocation

A SP request for an expedited thousand block allocation will occur on an exception basis. The following procedures enable a SP to request an expedited allocation of a thousand block(s). The expedite procedures below do not eliminate the Block Holder and PA responsibilities described in Section 9.5.

- a) A SP may send a request to the PA requesting an expedited allocation of a thousand block(s).

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- b) The requesting SP will indicate on the Thousand Block Application Forms – Part 1A that this is an expedited request for an allocation with its desired Effective Date.
- c) The PA will process the application if the request meets the criteria for the allocation of the thousand block(s) and will make every effort to process the application in fewer than the current maximum 7 calendar days. The PA will expedite such requests when it can do so without failing to meet its 7 calendar day allocation interval for other SPs. The PA will determine the minimum Effective Date for an expedited request based upon the following considerations:
- 1) If the thousand block applicant is the LERG Assignee, the Effective Date must be at least two business days after the Allocation Date. This allows for the PA to update RDBS/BRIDS and for LERG daily update.
 - 3)2) If the thousand block allocated requires NPAC notification and is the first “port” within the NXX code, the Effective Date will be no earlier than twelve (12) days after allocation (5 days to build the thousand block ownership table, 5 days for a first “port” and 2 days for LSMS downloads).
 - 5)3) If the thousand block allocated requires NPAC notification but is not the first “port”, then the Effective Date will be at least two business days after the Allocation Date. This allows for the PA to update RDBS/BRIDS and for LERG daily update.
- d) The SP will activate the thousand block and can begin customer assignments as soon as all NPAC processing and notification has occurred.

NOTE: SPs requesting an expedited assignment of thousand block(s) should be aware that there are potential impacts to other SPs and customers. This may affect customer service to the extent that a SP is unable to identify the SP to whom a thousand block has been assigned when responding to a customer trouble report.

10.0 Reclamation and Return of Thousand Blocks

This section outlines the various responsibilities of the Block Holder and the PA with respect to the reclamation and return of thousand blocks under a thousand block pooling arrangement. In addition, the various circumstances under which reclamation and return of thousand blocks can be initiated are

enumerated in this section.

Nothing in this section limits in any way a state's authority to order NANPA or the PA to reclaim codes or blocks pursuant to any authority delegated to the state by the FCC.

10.1 LERG Assignee/Block Holder Responsibility

10.1.1 If the LERG Assignee no longer provides service (nor has an LRN) in the rate area associated with the NXX code, they must notify the PA to select a new LERG Assignee.

10.1.2 Upon receipt of the reclamation request from the PA, the Block Holder must return the thousand block within 30 calendar days.

10.1.3 The Block Holder to which a thousand block(s) has been assigned from the industry inventory pool shall return the thousand block(s) to the PA if:

a) it is no longer needed by the entity for the purpose for which it was originally assigned;

e)b) the service it was assigned for is disconnected; or

e)c) the thousand block(s) was not placed in service within the timeframe specified in these guidelines.

10.1.4 If the thousand block(s) was not placed in service within the timeframe specified in these guidelines, the assignee may apply to the PA for an extension date of up to 90 days. Such an extension request must include the reason for the delay and a new in service time commitment.

10.2 Pool Administrator Responsibility

10.2.1 The PA has the authority to reclaim resources in the inventory of pool participants from both embedded resources as well as thousand blocks allocated to a SP by the PA.

10.2.2 The PA will contact any thousand block assignee identified as not having returned to the administrator for reassignment any thousand block(s) that were:

a) allocated, but no longer in use by the assignee(s);

b) allocated for a service no longer offered;

- c) allocated, but not placed in service within the timeframe specified in these guidelines;
- d) allocated, but not used in conformance with these guidelines; or
- 10.2.3 The PA will seek clarification from the assignee(s) regarding the alleged non-use or misuse. If appropriate, the PA will extend the in service date up to 90 days. If no satisfactory explanation is provided, the PA will request a letter from the assignee(s) returning the assigned thousand block(s). If a direct contact can not be made with the assignee(s) to effect the above process, a registered letter will be sent to the assignee(s) address of record and copied to the appropriate state regulatory agency. The letter will request that they contact the PA within ~~1030~~ days regarding the alleged resource non-use or misuse.
- 10.2.4 The PA must also notify and coordinate with the LERG Assignee in advance of the thousand block return Effective Date to allow sufficient time for the LERG Assignee to update switch translations in order to provide blank number treatment for the returned thousand block(s). The thousand block will be made available by the PA for re-assignment after 90 days.
- 10.2.5 Whether a thousand block is reclaimed or voluntarily returned, the PA is responsible for entering a disconnect in the RDBS/BRIDS data base (BCD record). This information includes the following data elements: OCN of the Block Holder, AOCN, the thousand block line range, switch ID and thousand block reclamation Effective Date.
- 10.2.6 If the reclaimed or returned thousand blocks have been entered into the NPAC, the PA must also notify the NPAC of those thousand blocks by completing the NPAC Thousand Block Reclamation form, Sections A and B (***Issue 168, contribution LNPA-238 will be worked to provide this form to the guidelines***). Notification should include the thousand block range and the effective date of the return. Upon completion of reclamation at the NPAC, the NPAC will notify the PA, LERG Assignee and Block Holder that the thousand block has been removed from the NPAC by completing Section C of the NPAC Thousand Block Reclamation form.

11.0 Jeopardy Situations

11.1 NPA Jeopardy Situations

When it is determined by the CO Code Administrator(s) based on the NPA

Code Relief Planning & Notification Guidelines (INC 97-0404-016) that an NPA is in jeopardy⁶, the PA will participate in the NPA jeopardy activities. The industry inventory pool participants are encouraged to also participate.

11.1.1 The following are special conservation procedures that will be invoked by the PA in the situation of a jeopardy NPA.

- a) During the special conservation period, the PA will treat all thousand block requests in a fair and impartial manner, consistent with the special conservation provisions.
- b) Upon receipt of the notice of the jeopardy situation from the CO Code Administrator and/or PA, each Block Holder will review their forecast and demand data and provide the information to the PA within 30 days using the Thousand Block Forecast Report (Appendix 1) unless the Block Holder has already provided such information to the PA within the past 30-day period.
- c) For additional growth thousand blocks, each Block Holder will certify that existing thousand blocks for the switching entity/POI, per service provided by that switching entity or POI, will exhaust within 36 months. Block Holders will have documented and must provide the Thousand Blocks Months to Exhaust Certification Worksheet - TN Level (Appendix 3) containing:
 - 1) TNs available for assignment,
 - 2) growth history of thousand blocks, or equivalent information, for the past 36 months, and
 - 3) projected demand for thousand blocks in the next 36 months.

The PA, when applying to the CO Code Administrator for additional NXX Codes for industry inventory pool growth will certify that existing thousand blocks for the rate area will exhaust within 36 months and will have documented and be prepared to supply supporting data.

The PA, when forwarding the LERG Assignee's application to the CO Code Administrator for additional NXX codes for the industry inventory pool, will attach aggregated industry pool data supporting the application in order to meet the Months to Exhaust Certification Worksheet – TN Level requirement for a CO Code assignment. The aggregated data should include:

⁶ A jeopardy NPA condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.

- 1) growth history of thousand blocks, or equivalent information, for the past six months,
- 2) thousand blocks available for assignment, and
- 3) projected demand for thousand blocks in the next six months.

The PA will forward to the CO Code Administrator the "Thousand Blocks Months To Exhaust Certification Worksheet – TN Level" that is supplied to the PA by the requesting SP, when applying for an NXX Code to:

- 1) satisfy the needs of a SP's single customer requirement for 10,000 consecutive TNs, or
- 2) be assigned for LRN purposes.

Requests for assignment of new NXX Codes for other than growth, or to serve a new switching entity/POI, should be minimized.

d) For thousand blocks reserved for SPs per Section 7.0:

- 1) SPs with reserved thousand blocks will be asked to voluntarily release the thousand blocks or confirm their proposed use date.
- 2) Reservations with a proposed use date beyond the NPA Relief Date will be reviewed and filled, with resources made available as a result of NPA relief.
- 3) Reservations with a proposed use date prior to the NPA Relief Date will not be honored if doing so would preclude the assignment of a thousand block resource for which a certified request has been processed.
- 4) Reservations with the latest proposed use date will be the first thousand blocks to be used for assignment, and the reservation will be canceled.

e) Requests for assignment of thousand blocks for other than growth, or to serve a new switching entity/POI, should be minimized. However, applications for such purposes can be submitted to the appropriate regulatory authority, or their designate. If the appropriate regulatory authority, or their designate, decides that a special purpose thousand block is warranted, the PA will make the assignment. The decision to postpone or withdraw a thousand block request is the Block Applicant's responsibility and must be submitted in writing to the PA.

11.1.2 Unique circumstances within a given jeopardy NPA may require extraordinary NPA-specific thousand block pooling conservation procedures. In this event, the following activities shall apply:

- a) The PA shall work in conjunction with the state regulatory commission, CO Code Administrator, and the affected parties to develop:
 - 1) NPA-specific CO Code conservation procedures; and
 - 2) NPA-specific thousand block pooling conservation procedures.
- b) The PA will monitor changes in the jeopardy situation using the forecast forms. Based upon the results of the analysis, the PA, in conjunction with the state regulatory commission and/or its consultants, will:
 - 1) implement each thousand block pooling conservation procedure as required, and
 - 2) notify the affected parties and the CO Code Administrator of the implementation.

11.2 Critical Industry Inventory Insufficiency

A critical industry inventory insufficiency exists for a rate area when the available resources in the industry inventory pool for a particular rate area fall below the actual and/or forecasted demand for the next 66 calendar days. The PA:

- a) will continue to assign thousand blocks on a first come, first served basis;
- e)b) will allow existing thousand block reservations to continue;
- e)c) will not allow new thousand block reservations to be made;
- f)d) should request that SPs voluntarily return thousand block(s); and
- h)e) should not reduce SP inventories to replenish the industry inventory pool.

11.3 In situations where lottery procedures are in place, the PA will be afforded priority treatment and assigned a code out of the lottery process upon request.

12.0 Auditing of Service Providers

The INC is working Issue #194 – Audit Guidelines – that will develop the audit guidelines for all NANP resources. The appropriate text on auditing will be inserted in this document upon resolution of that Issue.

Any audit guidelines adopted or referenced herein will in no way impede a state's ability to conduct its own for cause or random audits of SPs.

13.0 Appeals Process

Disagreements may arise between the PA and Block Holders/Applicants in the context of the administration of these guidelines. In all cases, the PA and Block Holders/Applicants will make reasonable, good faith efforts to resolve such disagreements amongst themselves, consistent with these guidelines, prior to pursuing any appeal. Appeals may include, but are not limited to, one or more of the following options:

- a) The Block Holder/Applicant will have the opportunity to resubmit the matter to the PA for reconsideration with or without additional input.
- b) Guidelines interpretation/clarification questions may be referred to the body responsible for maintenance of these guidelines, currently the INC. Unless otherwise mutually agreed to by the parties, these questions will be submitted in a generic manner protecting the identity of the appellant.
- c) The PA and Block Holders/Applicant may pursue the disagreement with the appropriate regulatory authorities or their designate.

14.0 Glossary

Active Block	A thousand block assigned by the Pool Administrator(s) and implemented by the block holder in the Public Switched Telephone Network (PSTN), in accordance with the block activation data and effective date.
Administrative Constraint, Reason	A limitation of the Point of Interconnection or Switching Entity where an existing block and/or TNs cannot be used for designated network routing and/or rating of PSTN calls. An example of a constraint would be the limitation in the administration of a thousand block across multiple switches in a rate area.
Administrative Number	An administrative number is one which is not, or should not be, assigned to a customer because it is in one of the following: <ul style="list-style-type: none">• Internal Business Purpose/Official Number• Identical to a Location Routing Number (LRN)• Test Number• Temporary Local Directory Number (TLDN)• Wireless E911 ESRD/ESRK
Administrative Operating Company Number (AOCN)	A four character numeric or alphanumeric that identifies the administrator of one (or more) data record contained in the Routing DataBase System (RDBS). Numeric/alphanumeric AOCNs are determined by Operating Company Number (OCN) assignment. The AOCN further identifies the entity authorized by the code holder to input and maintain data into RDBS and BRIDS.
Affected Parties	Affected parties are a) those entities that have applied for and/or received central office block (NXX-X) assignments or reservations within the NXX code b) administrative entities involved in number administration, number portability or number pooling.

Aging Number	An aging number is a number in the aging process. Aging is the process of making a disconnected telephone number unavailable for re-assignment to another subscriber for a specified period of time. An aging interval includes any announcement treatment period, as well as the vacant telephone number intercept period. A number is disconnected when it is no longer used to route calls to equipment owned or leased by the disconnecting subscriber of record.
Allocated/Assigned Block	A thousand block is allocated/assigned to an SP when the block information has been entered into RDBS/BRIDS by the PA.
Allocation Date	The Allocation Date is the date established by the PA when the PA officially makes the block assignment to an SP.
Applicant	SPs who submit a block request to the PA for the purpose of being assigned a thousand block for their use.
Assigned Number	An assigned number is (a) working in the PSTN under an agreement (e.g., tariff, contract) at the request of a specific customer for that customer's use, or (b) not yet working but has a customer service order pending.
Authorized Representative of an Applicant	A person from an applicant's organization or its agent that has the legal authority to take action on behalf of the applicant.
Block Applicant	See "Applicant."
Blocks Available for Assignment	Thousand blocks (NXX-X) within the industry inventory pool rate area which are within an NPA/NXX that is opened for LNP in the LERG and the NPAC, and which are available for assignment within the SP's rate area.

Block Exhaust	<p>a) When used by the block holder in applying for additional thousand blocks, a point in time at which the quantity of TN's within existing thousand block(s) which have been assigned to the block holder equals zero for a switching entity/POI.</p> <p>b) When used by the PA in applying for additional NXX codes, block exhaust is defined as a point in time at which the quantity of thousand blocks within the rate area which are "available for assignment" equals zero.</p>
Block Holder	The entity to which a thousand block (NXX-X) has been assigned for use.
BRIDS	The Business Rating Input Data Base System (BRIDS) contains data in the rating of calls. Data supports all CO Codes assigned through these guidelines, as well as all CO Codes in place prior to the existence of these guidelines, and covers all Numbering Plan Areas (NPAs) administered under the North American Numbering Plan (NANP). BRIDS is a replacement database for BRADS.
Central Office (CO) Code	The sub-NPA code in a TN, i.e., digits D-E-F of a 10-digit NANP Area address. Central office codes are in the form "NXX", where N is a number from 2 to 9 and X is a number from 0 to 9. Central office codes may also be referred to as "NXX codes."
CLLI®	An eleven-character descriptor of a switch and is used for routing calls.
Certify	<p>(When used by the applicant): As part of the Central Office Block (NXX-X) or the Central Office Code (NXX) Assignment Request, to attest, through a formal statement, information contained within the assignment request is true, accurate, and complete to the best of his/her knowledge.</p> <p>(When used by a regulator): Where applicable, to authorize, in writing, an entity to provide a telecommunications service in the relevant geographic area. Such authorization is the responsibility of the appropriate regulatory agency.</p>

COCUS (Central Office Code Utilization Survey)	A survey conducted in order to monitor use of central office codes, projected exhaust of NPAs and demand for new CO Codes from new NPAs to provide code relief. The purpose of COCUS is to provide an overall view of both present and projected CO Code (NPA/NXX) utilization for each NPA in the NANP.
CO Code Administrator	Entity(ies) responsible for the administration of the NXX codes within an NPA.
Code Holder	An assignee of a full NXX code which was allocated by the CO Code Administrator. Where the Code Holder is participating in thousand block pooling, the Code Holder becomes a LERG Assignee at the block donation date.
Conservation	Consideration given to the efficient and effective use of a finite numbering resource in order to minimize the cost and need to expand its availability in the introduction of new services, capabilities and features.
Contaminated Block	A contaminated block is a block of one thousand (X000-X999) TNs in which at least one TN is in any of the following categories: Administrative Number Aging Number Assigned Number Reserved Number
Critical Industry Inventory Insufficiency	Critical industry inventory insufficiency exists for a rate area when the available resources in the industry inventory pool for a particular rate area fall below the actual and/or forecasted demand for the next 66 calendar days.
Dealer Numbering Pools	Numbers allocated by a service provider to a retail dealer for use in the sale and establishment of service on behalf of that service provider.
Employee/Official Number	A number assigned by a service provider for its own internal business purposes.

Effective Date	The date by which routing and rating changes within the PSTN must be complete for the assigned thousand block or the assigned CO Code. Also, the date by which the thousand block becomes an active block.
INC (Industry Numbering Committee)	A standing forum of the Carrier Liaison Committee (CLC) that provides an open forum to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of numbering resources and related dialing considerations for public telecommunications within the North American Numbering Plan (NANP) area.
Industry Inventory Pool	Used in Thousand Block Pooling to describe a reservoir of unallocated thousand blocks administered by the PA for purposes of assignment to certified SPs participating in Thousand Block Pooling.
Initial Block	The first NXX-X block assigned at a unique switching entity or point of interconnection.
In Service	An active thousand block in which specific subscribers or services are utilizing TNs.
Intra-service provider Port	An Intra-service provider Port allows an SP to retain unavailable TNs in contaminated blocks that are being donated to the industry inventory pool. An intra-service provider port can also be used to move a TN(s) from one switch within a rate area to another switch within the rate area where LRN-LNP technology is in use.
Jeopardy	A jeopardy condition exists when the forecasted and/or actual demand for NXX code resources will exceed the known supply during the planning/implementation interval for relief.
LATA (Local Access and Transport Area)	Also referred to as service areas by some BOCs, a LATA serves two basic purposes: to provide a method for delineating the area within which the BOCs may offer services and, to provide a basis for determining how the assets of the former Bell System were to be divided between the BOCs and AT&T at divestiture.

LERG (Local Exchange Routing Guide)	Contains information about the local routing data obtained from the Routing Data Base System (RDBS). This information reflects the current network configuration and scheduled network changes for all entities originating or terminating PSTN calls within the NANP.
LERG Assignee	The SP responsible for default routing functions associated with a pooled NXX code.
LIDB	Line Information Data Base
LNP Port	The ability to move a TN from one SP to another SP using LRN-LNP technology.
Location Routing Number (LRN)	The ten-digit (NPA-NXX-XXXX) number assigned to a switch/POI used for routing in a permanent local number portability environment.
Months to Exhaust	<p>When used by SPs to certify the need for an additional block:</p> $= \frac{\text{TNs Available for Assignment}}{\text{Average Monthly Growth Rate}}$ <p>When used by the PA to certify the need for an additional CO Code:</p> $= \frac{\text{Blocks Available for Assignment}}{\text{Average Monthly Growth Rate}}$
NANP (North American Numbering Plan)	A numbering architecture in which every station in the NANP Area is identified by a unique ten-digit address consisting of a three-digit NPA code, a three digit central office code of the form NXX, and a four-digit line number of the form XXXX.

NANPA (North American Numbering Plan Administration)	With divestiture, key responsibilities for coordination and administration of the North American Numbering/Dialing Plans were assigned to NANPA. These central administration functions are exercised in an impartial manner toward all industry segments while balancing the utilization of a limited resource.
NANP Area	Consists of the United States, Canada and the Caribbean countries currently in NPA code 809.
NPA	<p>Numbering Plan Area, also called area code. An NPA is the 3-digit code that occupies the A, B, and C positions in the 10-digit NANP format that applies throughout the NANP Area. NPAs are of the form NXX, where N represents the digits 2-9 and X represents any digit 0-9. In the NANP, NPAs are classified as either geographic or non-geographic.</p> <ul style="list-style-type: none">a) Geographic NPAs are NPAs which correspond to discrete geographic areas within the NANP Area.b) Non-geographic NPAs are NPAs that do not correspond to discrete geographic areas, but which are instead assigned for services with attributes, functionalities, or requirements that transcend specific geographic boundaries. The common examples are NPAs in the N00 format, e.g., 800.
NPAC	Number Portability Administration Center.
NPAC SMS	The NPAC Service Management System is a database which contains all necessary routing information on ported TNs and facilitates the updating of the routing databases of all subtending SPs in the portability area.
NPA Code Relief	NPA code relief refers to an activity that must be performed when an NPA nears exhaust of its 792 NXX capacity. Options for relief are described in Section 6.0 of the NPA Code Relief Planning & Notification Guidelines.
NPA Relief Date	The date by which the NPA is introduced and routing of normal commercial traffic begins.

OCN (Operating Company Number)	Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to the Traffic Routing Administration (TRA) on 732-699-6700.
Point of Interconnection (POI)	The physical location where an SP's connecting circuits interconnect for the purpose of interchanging traffic on the PSTN.
Pool Administrator	Entity responsible for the administration of the NXX-X blocks within an area that has implemented thousand block pooling.
Premature Exhaust	When referring to NANP : Premature exhaust means the exhaust of NANP resources (i.e., requires expansion beyond the 10-digit format) much sooner than the best industry projections. The NANP is expected to meet the numbering needs of the telecommunications industry well into the 21 st century (i.e., a minimum of 25 years). (When referring to NPA): Premature exhaust is when a specific date for NPA relief has been established and the NPA is projected to exhaust prior to that date.
Public Switched Telephone Network (PSTN)	Public Switched Telephone Network. The PSTN is composed of all transmission and switching facilities and signal processors supplied and operated by all telecommunications common carriers for use by the public. Every station on the PSTN is capable of being accessed from every other station on the PSTN via the use of NANP E.164 numbers.
Rate Area	Denotes the smallest geographic area used to distinguish rate boundaries.

RDBS (Routing Data Base System)	Contains a complete description of all Local Exchange Companies' networks in the NANP Area and pertinent information relating to the networks of other code holders. This provides information for: (1) message routing, (2) common channel signaling call setup routing, and (3) operator service access routing.
Reassignment	The process of reestablishing the assignment of a thousand block, which was previously assigned to another SP or to a new SP.
Reseller	An SP which purchases facilities and/or services from another SP for resale.
Reserved Blocks	A thousand block that has been set aside by the PA for some specific future use or purpose.
Reserved Number	Definition to be provided by the NANC.
Service Providers (SPs)	Any entity that is authorized, as appropriate, by local governmental, state, federal or the NANP Area governmental authorities to provide telecommunications services to the public.
Service Provider Inventory	The inventory of all geographic NANP TNs allocated by the CO Code Administrator/PA to a code/block holder.
Soft Dial Tone	A number temporarily assigned to line equipment and facilities which permits restricted dialing (e.g., Operator, 911, service provider business office).
Switching Entity	An electromechanical or electronic system for connecting lines to lines, lines to trunks, or trunks to trunks for the purpose of originating/terminating PSTN calls. A single switching system may handle several central office codes.
Technical Requirement, Reason, Limitation or Constraint	A limitation of the Point of Interconnection or Switching Entity where an existing thousand block and/or TNs cannot be used for designated network routing and/or rating of PSTN calls. Examples that constitute "technical constraint" include limitations on a switch, network element or planning constraint, CPE limitations or unique AIN Triggers.

Test Number	A TN(s) assigned for inter- and intra-network testing purposes.
TN	Telephone Number
Temporary Local Directory Number (TLDN)	A number dynamically assigned on a per call basis by the serving wireless service provider to a roaming subscriber for the purpose of incoming call setup.
Thousand Block	A range of one thousand TNs within an NPA-NXX beginning with N000 and ending with N999, where N is a value from 0 to 9.
Thousand Block (NXX-X) Pooling	A number administration and assignment process which allocates thousand blocks to an industry inventory pool associated with a rate area.
TNs Available for Assignment	Numbers within existing codes (NXX) or blocks (NXX-X) which are available for assignment to subscriber access lines or their equivalents within a switching entity/POI, and are not categorized as Assigned Numbers, Administrative Numbers, Aging Numbers or Reserved Numbers. Vacant, Soft Dial Tone and Dealer Number Pool numbers are considered "TNs Available for Assignment. [Iss 200]
TNs Unavailable for Assignment	TNs that are categorized as Administrative Numbers, Aging Numbers, Assigned Numbers or Reserved Numbers.
Type 1 Interconnection Service Provider	A wireless SP that utilizes Type 1 (line side) interconnection with another SP's end office switch.
Unallocated Block	A thousand block which is currently in the Industry Inventory Pool which has not been assigned.
Uncontaminated Block	A thousand block(s) in which all 1,000 TNs within that block are available for assignment.
Vacant Number	A number available for assignment.

Wireless E911 ESRD/ESRK Number	A 10-digit number used for the purpose of routing an E911 call to the appropriate Public Service Answering Point (PSAP) when that call is originating from wireless equipment. The ESRD identifies the cell site and sector of the call origination in a wireless call scenario. The Emergency Services Routing Key (ESRK) uniquely identifies the call in a given cell site/sector and correlates data that is provided to a PSAP by different paths, such as the voice path and the Automatic Location Identification (ALI) data path. Both the ESRD and ESRK define a route to the proper PSAP. The ESRK alone, or the ESRD and/or Mobile Identification Number (MIN), is signaled to the PSAP where it can be used to retrieve from the ALI database, the mobile caller's call-back number, position and the emergency service agencies (e.g., police, fire, medical, etc.) associated with the caller's location. If a NANPA TN is used as an ESRD or ESRK, this number cannot be assigned to a customer.
-----------------------------------	--

Tracking Number: _____

Thousand Block Application Form
Part 1A

Type of Application: (Check one) New Change¹ Delete

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: _____
Contact Name: _____
Address: _____
City, State, Zip: _____
Phone: _____ Fax: _____
E-Mail: _____

Pool Administrator²:

Contact Name: _____
Address: _____
City, State, Zip: _____
Phone: _____ Fax: _____
E-Mail: _____

1.2 General Information

1.2A Required when a thousand block is needed for an LRN

This section applies if the applicant is requesting a thousand block for an LRN which will make the applicant the LERG Assignee. The LERG Assignee responsibilities are listed in Section 4.2 of the Thousand Block (NXX-X) Pooling Administration Guidelines (INC 99-0127-023).

NPA: _____ LATA: _____ OCN³: _____ AOCN: _____
Number of Thousand Blocks Requested: _____ Number of Full NXXs Requested: _____

Switch Identification (Switching Entity/POI)⁴: _____ City or Wire Center Name _____
Rate Center⁵: _____ Rate Center Sub Zone: _____
Homing Tandem Operating Company⁶: _____ Tandem Homing CLLI⁷: _____
Route same as NPA _____ NXX-X _____ Use Same Rate Center as NPA _____ NXX _____

1.2B Required when no LRN is needed

NPA: _____ LATA: _____ OCN: _____ AOCN: _____
Number of Thousand Blocks Requested: _____ Number of Full NXXs Requested: _____

Rate Center: _____
Switch Identification (switching Entity/POI)⁸: _____

1.3 Dates

Date of Application⁹: _____ Requested Block Effective Date: _____
Request Expedited Treatment? (See Section 9.6) Yes _____ No _____

1.4 Type of Service Provider Requesting the Thousand Block:

- a) Type of Service Provider: _____ (LEC, IXC, CMRS, Other)
- b) Type of service: _____
- c) Is certification or authorization required? Yes _____ No _____

Tracking Number: _____

Thousand Block Application Form
Part 1A

If No, explain: _____

- d) Does your company have certification? Yes _____ No _____
i) If yes, what type? _____ (regulatory authorization, license, tariff, etc)
ii) If no, explain: _____

e) Thousand Block(s) (NXX-X) assignment preference (optional) _____

f) Thousand Block(s) (NXX-X) that are undesirable for this assignment, if any _____

1.5 Type of Request (Initial, new application for existing switch, growth, update, reservation¹⁰, etc.) _____

1.6 Type of and Reason For Change: _____

1.7 If this Thousand Block request is for a new application for an existing switch, please explain:¹¹

1.8 Do NPA Jeopardy Criteria Apply? Yes _____ No _____

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousand Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

Signature of Block Applicant

Title

Date

Tracking Number: _____

Thousand Block Application Form
Part 1A

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pool Administrator section also requires the Service Provider to fill in the Pool Administrator's name, address, phone, fax and e-mail.

Section 1.2A Service Providers who need a thousand block assignment to satisfy a requirement for a Location Routing Number (LRN) are required to fill in this section. The Service Provider should supply the Numbering Plan Area (NPA) that the LRN will be associated with; the Local Access Transport Area (LATA) the LRN should operate in, which is a three-digit number that can be found in the LERG. The Operating Company Number (OCN) or Administrator Operating Company Number (AOCN) assigned to the Service Provider, or to their LERG input designee, is a four-character alphanumeric assigned by Telcordia Technologies Traffic Routing Administration (TRA). In addition, the number of thousand blocks requested and the number of full NXXs requested, if any, should be supplied. The Switch Identification specified in footnote 3, as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI tandem of the facilities based provider. Explanations of these terms may be found in the footnotes. The last line requires the Service Provider to verify how the thousand block being applied for is to route the same as another thousand block held by the carrier.

Section 1.2B Service Providers complete this section for thousand block code requests if they do not need a Location Routing Number. If the Service Provider completes section 1.2A, they should not complete this section. The fields in this section require the Numbering Plan Area (NPA) which is the area code; the Local Access Transport Area the LRN should operate in, which is a three-digit number that can be found in the LERG. The Operating Company Number (OCN) or Administrator Operating Company Number (AOCN) assigned to the Service Provider, or their input designee, is a four-digit number supplied by Telcordia Technologies Traffic Routing Administration (TRA). In addition, the number of thousand blocks requested and the number of full NXXs requested, if any, should be supplied. The Switch Identification described in footnote 7 should be specified, as well as the rate center.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousand block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The type of service should be indicated as well. Service Providers complete this section specifying whether they require certification, and provide an explanation of the certification if it is required. Service Providers also may indicate their preference for a particular thousand block, e.g., 321-9XXX, or indicate any thousand blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers fill out the type of request. Initial requests are for first applications for thousand blocks, growth for additional thousand blocks, additional thousand blocks for new applications, etc.

Section 1.6 Service Providers are to indicate if this application is for a situation where they have codes in the switch which are to be used for a different purpose, as described in Sections 7.0 and 9.3.4b.

Section 1.7 Indicate whether a jeopardy condition exists for this area.

Tracking Number: _____

Thousand Block Application Form
Part 1A

The thousand block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

-
- ¹ Identify type of and reason for change(s) in Section 1.6.
 - ² The Pool Administrator is available to assist in completing these forms.
 - ³ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (973-884-8249) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to Telcordia Technologies Traffic Routing Administration (TRA)(732-699-6700).
 - ⁴ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI®code of the switch /POI.
 - ⁵ Rate Center name must be a tariffed Rate Center.
 - ⁶ Applies to Type 2A wireless, competitive local exchange carriers, or any Block Holder connecting to a Public Switched Telephone Network (PSTN) interconnecting carrier.
 - ⁷ CLLI® code of PSTN interconnecting carrier switch/POI.
 - ⁸ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI® of the switch /POI.
 - ⁹ Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
 - ¹⁰ When the applicant is ready to place the thousand block in service, they should complete a new request form.
 - ¹¹ If eligibility is based on a category that requires additional explanation or documentation and the Pool Administrator denies a request, the applicant has the option to pursue an appeals process. Any additional information that can be provided by the applicant may facilitate the processing of the application.

Tracking Number: _____

Thousand Block Application Form
 Part 1B

NPAC BLOCK HOLDER DATA
 (Submit one form per thousand block request)

Activation Request: _____	
Or	
Modification Request: _____	For Information Only: _____

Section A:

(If request is for Activation, the thousand block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/donating switch information; the PA will fill in those three fields. For a Modification Request, the requestor is to provide all information)

Pool Administrator

Name _____
 Address _____
 City, State, ZIP _____
 Phone _____ - _____ - _____ Fax _____ - _____ - _____
 E-Mail _____

Block Applicant

Company Name _____
 Contact Name _____
 Address _____
 City, State, ZIP _____
 Phone _____ - _____ - _____ Fax _____ - _____ - _____
 E-Mail _____
 Service Provider NPAC SOA SPID¹ _____
 LRN² _____ - _____ - _____

Block (1K) Range ³ _____ - _____ - _____	
Block Effective Date (MMDDYYYY) ⁴ _____	
Is Block being allocated back to the LERG Assignee on the donating switch? Yes ___ No ___	
If Yes, do not send Part 1B to the NPAC. If No, forward Part 1B to the NPAC.	

NPAC Activate Block Range⁵ Yes ___ No ___

Section B:

(Block Applicant to provide this data **ONLY** if NPAC Activate Block Range is marked 'YES')

Class DPC⁶ _____
 Class SSN⁷ _____
 LIDB DPC⁸ _____
 LIDB SSN⁹ _____
 CNAM DPC¹⁰ _____
 CNAM SSN¹¹ _____
 ISVM DPC¹² _____
 ISVM SSN¹³ _____
 WSMSC DPC¹⁴ _____
 WSMSC SSN¹⁵ _____
 SOA Origination _____

Section C:

Tracking Number: _____

Thousand Block Application Form
 Part 1B

(NPAC is to Activate/Modify the Block (1K), as indicated on this form. When the Block (1K) Activation/Modification is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pool Administrator and Block Holder.)

Block (1K) Request Complete	Yes ___ No ___
Complete Date (MMDDYYYY)	___/___/___
Complete Time (HHMM)	___/___
NPAC Personnel performing change	_____

Block Holder sent Completed Form: Yes ___ No ___

Mailed Date (MMDDYYYY) ___/___/___

Mailed Time (HHMM) ___/___

Contact Name _____

Pool Administrator sent Completed Form: Yes ___ No ___

Mailed Date (MMDDYYYY) ___/___/___

Mailed Time (HHMM) ___/___

Contact Name _____

Remarks: _____

Notes:

- 1) The requesting Block Applicant shall complete this form except for Block Range and Block Effective Date, when submitting PART 1 of the INC Thousands Block Applicant form to the Pool Administrator. A separate Part 1B form is to be completed for each 1K Block Range requested.
- 2) The Pool Administrator will insert Block Range and Block Effective Date information, then submit this form to the regional NPAC at the same time PART 3 of the INC Thousands Block Applicant form is returned to the requesting Block Applicant.
- 3) Pre- Block Activation:
 - a) If the Block Holder is requesting a modification, the Block Holder needs to complete Sections A and any applicable data in Section B of this form and send it to the Pool Administrator (PA). The PA will review the form to insure correctness and forward it to the NPAC for processing.
 - b) If the Pool Administrator (PA) is requesting the modification to the Block Range and/or Effective Date, the PA will review the change with the Block Holder. After receiving concurrence from the Block Holder, the PA will update the Block Range and/or Block Effective Date information on Section A and forward it to the NPAC for processing.
- 4) Post- Block Activation: If Block Holder requests NPAC to perform the Block Modification, then Sections A & B of this form should be completed and send to the Pool Administrator. The Pool Administrator will sent the information on to the NPAC. Upon completion of this request, NPAC sends a copy of the completed form to the Pool Administrator and Block Holder.

Tracking Number: _____

Thousand Block Application Form
Part 1B

Foot Notes:

- ¹ The Service Provider ID of the block holder. The SPID must be a valid SPID in the NPAC system. If your company does not have a SPID, please call the NPAC at 1-888-NPAC-HEL(P) for assistance.
- ² A Location Routing Number is a 10-digit number, in the format NPA-NXX-XXXX, that uniquely identifies a switch or point of interconnection (POI). The NPA-NXX portion of the LRN is used to route calls to numbers that have been ported.
- ³ The Pool Administrator will insert Block information. The Block will consist of NPA-NXX and the first digit of the 1K block.
- ⁴ The Pool Administrator will insert Block Effective Date. See section 9.2.4 of the Thousand Block Pooling Administration Guidelines for specifics on effective date. This is the earliest date that the NPAC will broadcast the Block information to all Local SMS's.
- ⁵ If "YES" is marked the NPAC will activate the block range. If "NO" is marked it will be the responsibility of the SP to activate the block range.
- ⁶ Customer Local Area Signaling Services Destination Point Code for 10-digit GTT for CLASS features for the 1K block. The CLASS DPC must be three sets of numbers where the value for each set ranges from 0 to 255
- ⁷ Customer Local Area Signaling Services Subsystem Number for the 1K block. The CLASS SSN must be a number between 0 and 255.
- ⁸ Line Information Database Destination Point Code for 10-digit GTT for LIDB features for the 1K block. The LIDB DPC must be three sets of numbers where the value for each set ranges from 0 through 255.
- ⁹ Line information Database Subsystem Number for the 1K block. The LIDB DPC must be three sets of numbers where the value for each set ranges from 0 through 255.
- ¹⁰ Calling Name Delivery Destination Point Code for 10-digit GTT for CNAM features for the 1K block. The CNAM DPC must be three sets of numbers where the value for each set ranges from 0 through 255.
- ¹¹ Calling Name Delivery Subsystem Number for the 1K block. The CNAM SSN must be a number between 0 and 255.
- ¹² Inter-Switch Voice Mail Destination Point Code for 10-digit GTT for ISVM features for the 1K Block. The ISVM DPC must be three sets of numbers where the value for each set ranges from 0 through 255.
- ¹³ Inter-Switch Voice Mail Services Subsystem Number for the 1K block. The ISVM SSN must be a number between 0 and 255.
- ¹⁴ Wireless Short Message Service Center Destination Point Code for 10-digit GTT for WSMSC features. This field is only required if the service provider supports WSMSC data. The WSMSC must be three sets of numbers where the value for each set ranges from 0 through 255.
- ¹⁵ Wireless Short Message Service Center Subsystem Number for the 1K block. This field is only required if the service provider supports WSMSC data. The WSMSC must be a number between 0 and 255.

Thousand Block Application Form
Part 3

Pool Administrator's Response/Confirmation

Date of Application _____ Block Effective Date _____
Date of Receipt _____ Date of Response _____
Service Provider Name _____
LERG OCN- _____
NPAC SOA SPID _____

Pool Administrator Contact Information:

Signature of Pool Administrator Phone _____

Name (print) Fax _____
E-mail _____

____ **NPA-NXX** _____ **Block(s) Assigned** _____
Block Contaminated (Yes or No) _____
Block Allocation Date _____

Switch Identification (Switching Entity / POI)¹

Rate Center _____
Rate Center Sub Zone _____

____ **Block Reserved** _____
Date of Reservation _____
Your block reservation will be honored until _____
Switch Identification (Switching Entity / POI) _____

____ **Form incomplete**
Additional information required in the following section(s): _____

¹ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI®) of the switch/POI shown on the Part 1A form.

Thousand Block Application Form
Part 3

___ **Form complete, block request denied**

Explanation:

___ **Assignment activity suspended by the administrator**

Explanation:

Further Action:

___ **NPA in jeopardy: Yes** _____ **No** _____

If yes, refer to Section 11 of the assignment guidelines.

Remarks:

Thousand Block Application Form
Part 4

Confirmation of NXX-X Block In Service
(Unless this form is returned to the PA, reclamation procedures may be initiated)

By signing below, I certify that the block(s) (NXX-X[s]) specified in Section 1 below is(are) in service and is(are) being used for the purpose specified in the original application.

Print Name of Authorized Representative
of Company/Entity

Signature

Title

Date

1. NPA-NXX-X block(s): _____
2. Switch Identification (Switching Entity / POI)¹: _____
3. Date block(s) put in service: _____
4. Date of Block Allocation: _____

¹ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI®) of the switch/POI shown on the Part 1A form.

Appendix 2

THOUSAND BLOCK FORECAST REPORT

The numbers and explanation below correspond to the numbers on the Thousand Block Forecast Reporting tool developed for Thousand Block (NXX-X) Pooling Administration Guideline requirements at the behest of the industry. Service Providers must provide required forecast information by means of this spreadsheet.

Please note that this form is intended to be an electronic web file or in an Electronic File Transfer (EFT) interface file, so that both SP and the Pool Administrator may gather the information as automatically as possible.

- 1 Service Provider fills in name, OCN, contact person and telephone number, fax, and e-mail address.
- 2 This portion contains a field for Service Provider type, i.e., LEC, IXC, CMRS, Reseller, Type 1, or Other. Service Provider should indicate one type.
- 3 "All Information as of (Date)" provides a field to indicate the data collection date. Service Provider fills out this field.
- 4 The NPA field indicates the area code associated with the forecast data. Service Provider fills out this field.
- 5 YES indicates Reseller/Type 1 CMRS forecast requirements have been incorporated into the forecast. NO indicates Reseller/Type 1 CMRS forecast requirements have NOT been incorporated into the forecast. The Service Provider is then required to provide the name and contact information for any Reseller/Type 1 CMRS carriers who have obtained numbering resources of more than 1,000 TNs per NXX.
- 6 "LERG RC" - This will be pre-populated by the PA using the rate centers designations from the LERG.
- 7 Forecast data on a quarterly basis will be input in the XQ/YY sections. Service Provider provides this forecast data. The PA will provide the dates associated with XQ/YY sections as part of the electronic web interface.
- 8 Indicates whether the forecasted data provided by the SP is also to be considered for the Central Office Code Utilization Survey (COCUS) forecast reporting requirement.
 - If a Service Provider checks NO, the data contained in the Thousand Block Forecast Report will ONLY be used by the Pooling Administrator to size the industry inventory pool.
 - If a SP checks YES, that mark indicates that the Thousand Block Forecast Report data is to be used for the forecast component of COCUS for the indicated date.
- 9 To be completed if a Service Provider indicates YES in #8, the time intervals in the shaded area expands the forecast to three, four and five years (YY) to mirror COCUS forecast input requirements. This additional annual forecast data will allow Service Providers who wish to file only one forecast form the ability to use the forecast data contained in the Thousand Block Forecast Report form for meeting their COCUS forecast requirement.

**Thousand Block Pooling
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹**
(Worksheet must be completed by the block applicant when requesting additional blocks for growth)

Date: _____

Company Name: _____

Rate Center: _____

Switching Entity/Point of Interconnection (CLLI*R*): _____

NPA(s): _____ List Full NPA(s) - NXX(s) and Block NPA(s) - NXX-Xs included in growth calculation²:

Signature of Authorized Representative of Company Applicant: _____

Title: _____ Telephone No.: _____ FAX No.: _____

E-Mail: _____

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): _____

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month#7	Month#8	Month#9
B. Previous 9-month incremental growth history ⁴ :	_____	_____	_____	_____	_____	_____	_____	_____	_____

C. Projected incremental demand - Months 1-9 ⁵ :	_____	_____	_____	_____	_____	_____	_____	_____	_____
---	-------	-------	-------	-------	-------	-------	-------	-------	-------

D. Average Monthly Growth Rate (From Part C above): _____

E. Months to Exhaust^{*5*} = $\frac{\text{Telephone Numbers (TNs) Available for Assignment (A)}}{\text{Average Monthly Growth Rate (D)}}$ = _____

Explanation:

1 The original worksheet should be retained by the block applicant in the event of an audit or regulatory initiative; a copy must be submitted to the PA with thousand block application.
2 Report on all resources served by the Switching Entity/POI for the requested geographic area.
3 Definitions of terms may be found in the glossary of the Thousand Block (NXX-X) Assignment Guidelines.
4 Telephone Numbers (TNs) assigned in each previous month, starting with the most distant month as Month #1, and Month #9 as the current month. Refer to Thousand Block Administrative Guidelines Glossary for a list of TNs considered unavailable.
5 Projected growth of unavailable TNs in each following month, starting with month #1 being the current month plus 1.
5 To receive an additional block for growth, "Months to Exhaust" must be less than or equal to 9 months in a non-jeopardy NPA Situation. In a NPA jeopardy situation, "Month's to Exhaust" must be less than or equal to 6 months.

Thousand Block Pooling
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - 1000 Block Level¹
(Worksheet must be completed by the Pool Administrator when requesting additional CO Codes for growth)

Date: _____
Pool Administrator Name: _____ Rate Center: _____
NPA: _____
Signature of Pool Administrator: _____
Telephone No.: _____ FAX No.: _____ E-Mail: _____

- A. Thousand Blocks Currently Available for Assignment _____
B. Previous 9-month incremental growth history of blocks²: Month #1 Month #2 Month #3 Month #4 Month #5 Month #6 Month#7 Month#8 Month#9
C. Projected incremental demand for blocks - Months 1-9³: _____
D. Average Monthly Growth Rate (From Part C above): _____
E. Months to Exhaust⁴ = Blocks Available for Assignment (A) / Average Monthly Growth Rate (D) = _____

Explanation:

1 A copy of this worksheet should be retained by the Pool Administrator in the event of an audit or regulatory initiative and the original submitted to the CO Code Administrator.
2 Thousand Blocks assigned in each previous month, starting with the most distant month as Month #1, and Month #9 as the current month.
3 Thousand Blocks assigned in each following month, starting with the most recent month as Month #1.
4 To receive an additional CO Code for growth, "Months to Exhaust" must be less than or equal to 9 months in a non-jeopardy NPA Situation. In a NPA jeopardy situation, "Month's to Exhaust" must be less than or equal to 6 months.

DRAFT
USER PROFILE APPLICATION

This form must be completed in order for the designated User to gain entry into the Pooling Administration system. This access privilege will allow the User to view the available blocks contained within the designated industry inventory pool or submit thousand block(s) application(s) using the web or Electronic File Transfer (EFT) interface. If you are a new user of the system, the Pooling Administrator for security verification may contact you before assigning your Password. In addition, this form is also to be used when there is any change to the established USER profile.

User Contact Information:

Service Provider: _____
Name: _____
Title: _____
Address: _____
City, State, Zip: _____
Phone: _____
Fax: _____
E-mail: _____

Level of User Access:

Level(s) of User access to pooling information will be set by the Pool Administrator based on these User Profile designations:

Specific Pool (NPA-Rate Center) – this designation limits the User to only the specified industry pool.

NPA(s) – single or multiple area codes that the User will be assigned access

State(s) – single or multiple states and all the associated NPAs residing within those designated states that the User will be assigned access.

Company OCN(s) – User will be assigned access to all information associated with the designated company OCN

Please select the specific level of access that is to be assigned to this User Profile from one of the following:

Specific Pool (NPA-Rate Center) _____
NPA(s) _____
State(s) _____
Company OCN(s) _____