

March 11, 2003

Mr. Mark Oakey
Contracting Officer
FCC
445 12th St., SW
Washington, DC 20554

Mr. Mark Oakey:

On behalf of NeuStar, Inc., I am pleased to submit the 2001-2002 Annual Report for the National Pooling Administrator (National PA).

In this report, we focus on the various pooling resources we have administered since being awarded the National PA contract in June 2001. NeuStar has proven itself capable of both meeting the sizable challenges unique to pooling, and successfully performing in our role as the PA. In fact, we met and often exceeded every obligation to the industry and regulatory agencies during this reporting period.

We thoroughly understand the critical nature of the thousands-block pooling services that we provide to the Commission, state regulatory commissions, and the telecommunications industry – and we are firmly committed to providing the highest quality and level of service. .

I thank you for granting NeuStar the opportunity to serve as the National PA.

Please do not hesitate to contact the NeuStar pooling staff with any comments, suggestions, observations, or concerns.

Sincerely,



Barry Bishop
Director, Number Pooling Services
NeuStar, Inc.

Enclosure

2002 Annual Report

National thousands-block poolink administration

Prepared by NeuStar, Inc. for Contract # SOL01000011

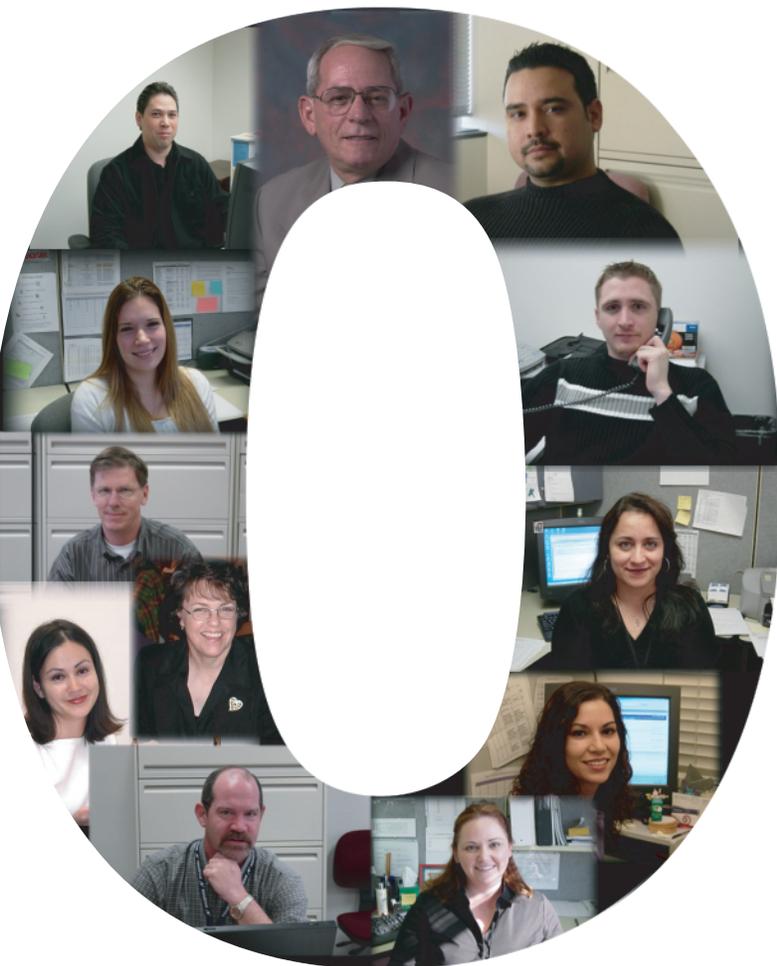


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1. Executive summary

NeuStar, Inc. presents the 2001-2002 National Thousands-Block Pooling Administration Annual Report, which highlights our achievements as the National PA over the 18-month period from the June 15, 2001 contract award to the end of the 2002 calendar year, and is being submitted pursuant to the NPA Contract Data Requirements List (CDRL) 4.6.1. Our report coincides with the completion of the 2002 North American Numbering Plan Administration (NANPA) Annual Report, which is being submitted to the Commission under separate cover.

The bulleted list below is a synopsis of NeuStar's major pooling accomplishments during the 2001-2002 reporting period. Section numbers corresponding to each highlight have been italicized and listed parenthetically; they point to more detailed descriptions within this report.

- Thousands-block pooling. As the National PA, NeuStar successfully conducted implementation meetings for thousands-block pooling in over 75 NPAs in the time prescribed by the national rollout schedule approved by the FCC/Common Carrier Bureau. NeuStar currently manages pools in 187 areas codes and 7233 rate centers. These totals include rate areas considered "optional" or "voluntary" (those located outside the top 100 Metropolitan Statistical Areas, or MSAs). NeuStar's strict adherence to FCC directives concerning thousands-block pooling increased the estimated life of the North American Numbering Plan (NANP), as evidenced by the NANPA report. (Sections 3.1 and 4)
- Pre-existing state thousands-block pooling trials. NeuStar successfully transitioned pre-existing state thousands-block pooling trials to the national Pooling Administration System in a timely manner. (Section 2.2)
- Transition of wireless carriers to pooling. NeuStar successfully and seamlessly transitioned wireless carriers to pooling on November 24, 2002, as directed by the FCC. (Section 2.9)
- Native block pooling. NeuStar developed and successfully implemented wireless Native Block Pooling in over 170 NPAs (Section 2.7)
- Unassigned Number Porting trial. NeuStar assisted the industry in developing procedures for—and subsequently implemented—a modified Unassigned Number Porting trial in Connecticut. (Section 2.12)
- Pooling Administration System (PAS). NeuStar developed, tested, and put into service a fully automated Pooling Administration System (PAS), which conformed to the FCC technical requirements. (Section 2.3.1)
- Comprehensive and timely reporting. NeuStar produced over 250 reports for the FCC, state regulatory agencies, NANC, NANPA, and service providers during the reporting period. (Section 9)

Further, in accordance with the requirements set forth in Section 2.18.1 of the Thousands-Block Pooling Contactor Technical Requirements, this report also contains the following, inter alia:

- Highlights and significant milestones attained during the reporting period
- Identification of existing and potential pooling areas
- Aggregate totals (by pool) of service providers participating in pooled areas
- Forecast results, and review of forecasts versus actual block activations in the past
- System and performance metrics
- Status of required transferable property
- Industry issue identification and feedback

- Volume of reports produced and aggregated for Federal and state regulatory agencies, NANC, NANPA and service providers
- Additional information and data

2. Highlights/significant milestones reached during the previous year and a half

- National PA successfully conducted implementation meetings for thousands-block pooling in over 75 area codes, according to the national roll out schedule approved by the FCC/ Common Carrier Bureau. These totals include rate areas considered “optional” (those located outside the top 100 Metropolitan Statistical Areas, or MSAs)
- National PA developed and successfully implemented wireless Native Block Pooling for over 170 NPAs.
- National PA assisted the industry in developing procedures for and subsequently implemented a modified Unassigned Number Porting (UNP) trial in Connecticut.
- National PA developed, tested, and put into service a fully automated Pooling Administration System (PAS), which conformed to the FCC technical requirements.

Over the first 18 months (June 2001 thru Dec 2002) of the contract National PA hired and trained staff, deployed the Pooling Administration System (PAS), developed and implemented wireless Native Block Pooling for over 170 NPAs, along with the industry, developed procedures for and implemented a modified Unassigned Number Porting (UNP) trial in Connecticut, successfully transitioned wireless carriers to pooling on November 24, 2002 and implemented over 75 NPAs on time according to the national rollout schedule, including rate areas considered optional because they do not fall within a Top 100 MSA. All this was accomplished with only two formal complaints (found to be without merit), no system failures that impacted customers, and with numerous letters of praise from the industry and regulatory users.

The following highlights these and other accomplishments in greater detail.

2.1 Pooling organization

Director, Mr. Barry Bishop oversees and manages all aspects of the Pooling Administration contract including the day to day operations of the groups which comprise the National PA organization as indicated below:

Pooling Administration Services—Concord, CA

The Pooling Administration (PA) Services Group is responsible for performing the core functions of pooling administration, help desk, quality assurance, and industry interface.

Regional Director, Shannon Collins, manages the operation of the group.

Pooling Administrators process the incoming Part 1A and Part 1B forms, assign blocks, apply for NXX codes through the Code Administration group to populate and replenish pools, and reclaim blocks in accordance with FCC requirements, state commission orders and INC thousands-block pooling guidelines.

The pooling administrators and states that they handle are:

Kevin Gatchell	Gary Zahn	Dora Wirth	Tara Farquhar	Dara Sodano	Andrea Velilla
CA	FL	AL	AZ	DC	HI
IL	MD	MA	CO	CT	AK
ME	NY	NH	IA	DE	AR
TX	PA	RI	ID	GA	KS
WA		TN	IN	MS	KY
		VA	LA	NC	MN

Kevin Gatchell	Gary Zahn	Dora Wirth	Tara Farquhar	Dara Sodano	Andrea Velilla
			MI	NJ	MO
			NE	SC	OK
			NM	VT	WI
			NV	WV	SD
			OH	AL	ND
			OR	PR	WY
			UT		

Customer Service Representative (CSR), (currently Ms. Julie Kline), answers calls that come into the Help Desk for assistance. Throughout the report period, the CSR responded to both internal and external requests for technical support, confirmed the cause of the problem, and identified and resolved technical problems. The CSR monitored trouble tickets to ensure timely resolution of problems, and escalated issues in a timely manner. The CSR troubleshoot problems over the phone and at the desktop, and maintained the trouble ticket logs. The CSR also answers questions regarding use of forms, assists users with locating documentation, and handles the creation, deletion, and maintenance of user accounts and passwords.

Quality Assurance Manager (QAM), Joseph Rano, evaluates National PA’s conformance to the standards mandated by the federal and state regulatory agencies, and compliance with industry guidelines. Throughout the report period, Mr. Rano performed operational and business audit reviews, evaluated results, and made recommendations for the improvement of internal operational and management control systems and performance. Mr. Rano ensured compliance with internal performance measurements and performed internal audits on a percentage of all blocks processed. He sent out surveys to the PA customers, the service providers and regulators, soliciting their comments about NeuStar’s performance and services, and, as appropriate, incorporated their suggestions for improving the process.

Industry Interface Representative (IIR), Florence Weber, represents National PA at industry work group meetings such as the Industry Numbering Committee (INC) and the Committee Interest Group on Rating and Routing (CIGRR). Throughout the report period, she prepared National PA contributions for submission to industry work groups, advised the pooling group about the results of any discussions, and followed up on any action items. Ms. Weber also educated staff on changes to guidelines; this function is critical to the legal/regulatory group’s effective communication with state regulators, the NANC, and the FCC about how changes in guidelines affect pooling operations.

Administrative Assistant (AA), Alishia White, provides direct support for the Pooling Administration Service Center (PASC). Throughout the report period, Ms. White prepared letters, memoranda, reports, outlines, schedules, agendas, labels, and handled telephone inquiries in a timely manner. Ms. White also maintained a calendar and travel schedule for the Director and Regional Director and established and maintained filing systems. She routinely handled office duties such as answering phones, mail distribution, copying, and faxing. Ms. White served as backup for the Customer Service Representatives and answered inquiries in a timely manner. She supported other PASC personnel as necessary and maintained time reporting for all PASC personnel.

Technical Operations Group—Concord, CA and Sterling, VA

The Technical Operations Group, consisting of the Manager of Technical Operations, Wayne Louie, Database Administrator, Brandon Baldwin, and Systems Administrator, Jeremiah Jenkins, are responsible for the day-to-day operation of the system and equipment. This group is the vanguard for support, security, and maintenance of the pooling administration systems. The Technical Operations Group is located in both the Pooling Administration Services Center in Concord, CA and the main system site located in Sterling, VA, allowing members to rapidly address any technical

concerns, thereby reducing the possibility of a system outage. The goal of the Group is to continue to provide quality assurance support. Throughout the report period, the National PA consistently met and/or exceeded its service level agreements with both internal and external customers.

Some of the milestones achieved by the Technical Operations Group this year include:

- Successful, on-time delivery of the National Pooling Administration System on March 15, 2002;
- Implementation and on-going support for the PAS FTP- Service Provider Interconnection Certification process;
- Complete and comprehensive training of all Pooling Operation and Technical team members as required by our Security Plan CDRL;
- Successfully remaining compliant with our contractual Service Level Agreements during the PAS Data Center move from Chicago, IL to Charlotte, NC; and
- Provided consistent, timely responses and resolution to customer issues both internal and external within one business day.

Manager Technical Operations, Wayne Louie. Throughout the report period, Mr. Louie managed the technical operations group, supported pooling services applications, and monitored, tested and troubleshoot hardware and software problems. He is also responsible for web and system design and maintenance as well as maintaining the security and disaster recovery procedures.

Database Administrator, Brandon Baldwin. Throughout the report period, Mr. Baldwin developed and implemented policies and procedures for ensuring the security and integrity of the National PA database.

Systems Administrator, Jeremiah Jenkins. Mr. Jenkins maintained all network hardware, in addition to maintaining and installing network software, user accounts and passwords, LAN/WAN additions and changes, and maintenance of the network.

Pooling Implementation Group—virtual offices

The Pooling Implementation Group is responsible for managing the implementation of the national pooling rollout schedule established by FCC orders. This includes:

- Development of detailed quarterly rollout schedules;
- Preparation for, and facilitation of, all implementation meetings for each NPA;
- Publication of the industry-determined implementation timeline for each NPA;
- Establishment of all pools in PAS;
- Development and maintenance of all rate center files on the pooling website;
- Development and maintenance of the Metropolitan Statistical Area (MSA) database; and
- Attendance at all NANPA relief planning and jeopardy meetings.

Regional Director, Bruce Armstrong – Longmont, CO

Regional Implementation Managers,

- Sandra Bocclair, Eastern Region – Mechanicsville, VA
- Tim Booth, Central Region – Simi Valley, CA
- Cecilia Louie, Western Region – Pittsburg, CA

Legal/External Relations and Compliance Group—virtual offices

The Legal/External Relations and Compliance Group is responsible for addressing all activities identified by the FCC relating to legal, regulatory, compliance, media, and public relations issues. In addition to reviewing and responding to federal and state orders, regulations, and policies issued by the regulatory authorities, they ensure compliance with industry guidelines and the directives of the contract. Throughout the report period, the Attorney/Regional Director worked diligently with the wireless industry on pooling issues. Similarly, the Manager-Regulatory Compliance, Ms. Linda Hymans, sent email notifications to the state regulatory personnel regarding issues pertaining to pooling, such as posting of the quarterly rollout schedule, and facilitated training for states with no prior pooling experience.

Accomplishments this report period include:

- Facilitated four regulatory conference calls regarding number pooling issues;
- Conducted training for eleven (11) state commissions' regulatory staff in states with no prior pooling experience [See Attachment #1 for sample state commission training presentation];
- Assisted the wireless industry in the development and implementation of the Native Block Pooling process, including conducting wireless First Implementation Meetings for all NPAs already in wireline pooling;
- Participated as an active member of the national Wireless Pooling Task Force, and assisted in the drafting of the Wireless Transition Plan to Thousands-Block Pooling;
- Participated as necessary in First Implementation Meetings where unusual legal/regulatory issues were recognized;
- Worked with North American Portability Management (NAPM) LLC, state regulatory staffs, and industry to facilitate the orderly transition of the Telcordia state trials to NeuStar;
- Facilitated two conference calls for the California Public Utilities Commission and the industry regarding the impact of grandfathered codes in pooling areas, and filed comments identifying how the various proposals would affect pooling;
- Made presentations in numerous states and to industry groups regarding number pooling and wireless issues;
- Responded on an ad hoc basis to frequent calls from state regulators regarding pooling issues; and
- Attended NARUC meetings and all meetings of the North American Numbering Council.

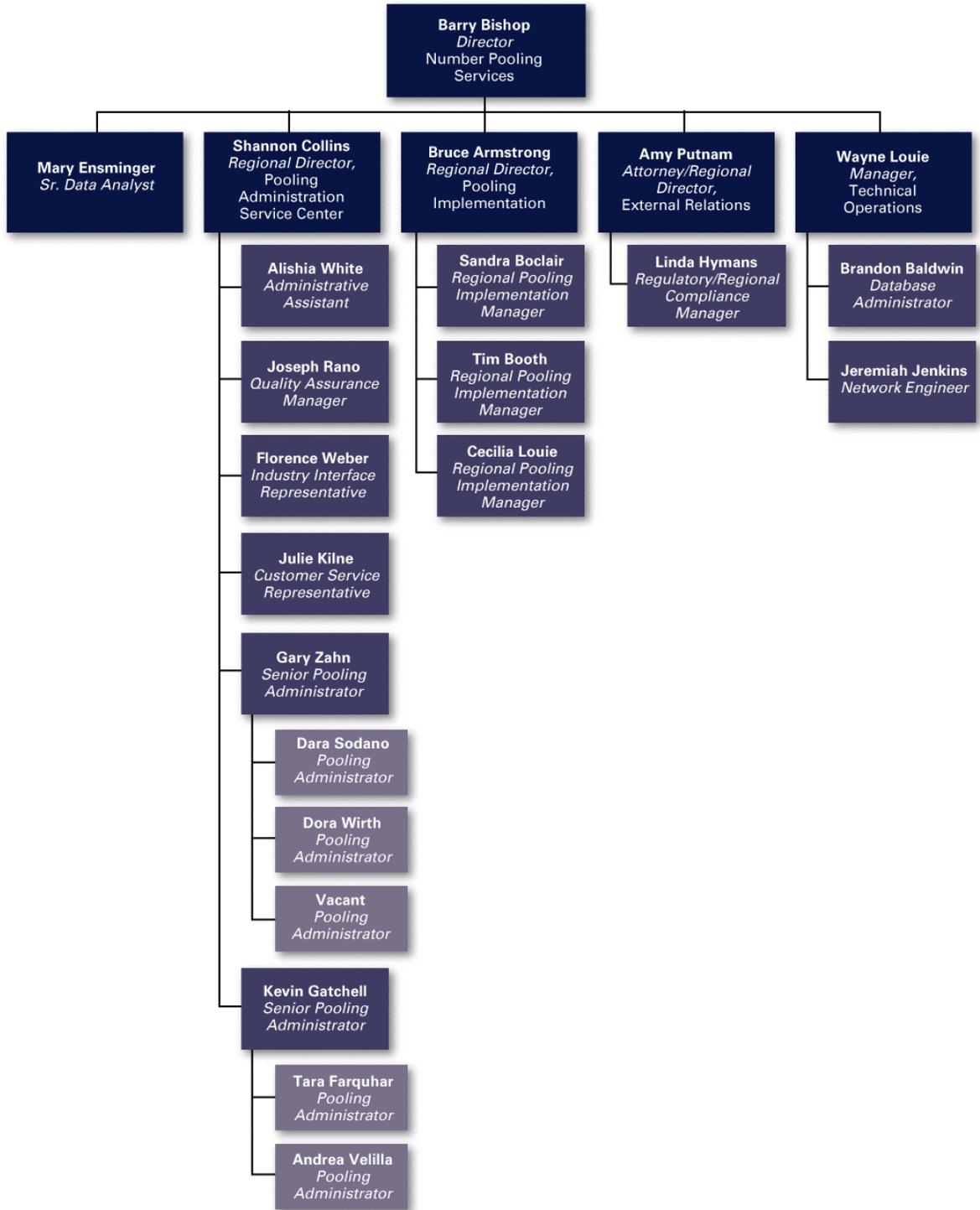
Attorney/Regional Director, Amy Putnam, Esq. – Harrisburg, PA

Manager - Regulatory/Compliance, Ms. Linda Hymans – Cedar Park, TX

Senior Data Analyst, Ms. Mary Ensminger – Rockville, MD. Throughout the report period, Ms. Ensminger collected and analyzed data and prepared all necessary reports using the results of that analysis. She is responsible for managing the Number Resource Utilization and Forecast (NRUF) reports and data.

The chart on the following page shows the NeuStar National Pooling Administration Service Organization.

NeuStar National Pooling Administration Services Organization



Annual staffing report 12/31/02

Labor category	Number rqd	Name	Date hired for pooling
Director, Number Pooling Services	1	Barry Bishop	06/15/2001
PA administration and maintenance team			
Regional Director, PAS Center	1	Shannon Collins	06/15/2001
Administrative Assistant	1	Alishia White	01/15/2002
Customer Service Representative	1	Julie Kline	06/24/2002
Senior Pooling Administrator	2	Gary Zahn	11/15/2001
****	--	Kevin Gatchell	06/15/2002 (promotion)
Pooling Administrator	5	Dara Sodano	06/15/2002 (promotion)
****	--	Dora Worth	11/15/2001
****	--	Tara Farquhar	03/15/2002
****	--	Andrea Velilla	08/19/2002
****	--	(Vacant Due 2004)*	-----
Manager of Quality Assurance	1	Joseph Rano	03/15/2002
Industry Interface Representative	1	Florence Weber	01/06/2002
Manager, Technical Operations	1	Wayne Louie	06/15/2001
Network Engineer	1	Jeremiah Jenkins	12/02/2002 (new hire)
Database Administrator	1	Brandon Baldwin	07/30/2001
Regional Director, Pooling Implementation	1	Bruce Armstrong	01/15/2002
Regional Pooling Implementation Manager	3	Cecilia Louie	01/07/2002
****	--	Sandra Bocclair	01/14/2002
****	--	Tim Booth	01/14/2002
Attorney/Regional Director, External Relations Manager	1	Amy Putnam	06/15/2001
Regulatory/Compliance Manager	1	Linda Hymans	06/15/2001
Senior Data Analyst	1	Mary Ensminger	01/15/2002
		Total	22
		Shortage	0
		Overage	0
		Yearly turnover	2.64%

Notes:

* New hire or employee not identified.

Date hired = date employee brought on National Pooling organization.

2.2 Transition of all Telcordia state pooling trials

Pursuant to our contract, the National PA migrated all existing non-NeuStar-administered state pooling trials, except Virginia, to the existing state platform within 60 days of contract award. NeuStar was granted an extension by the FCC to migrate the trials in Virginia to the national platform due to the additional time needed by the Virginia State Corporation Commission to issue appropriate orders prior to the transition. The early transition of these trials provided consistency among all state trials for service providers who operate in multiple states, in addition to minimizing database inconsistencies in the development of the PAS.

The National PA contacted the affected state regulatory staff, the North American Portability Management (NAPM) LLC, and other state trial vendor(s), to negotiate the orderly transition schedule. The National PA then contacted existing trial participants to notify them of the details and the dates of the transition. Following is a breakdown of the steps to the completion of the transition to NeuStar.

Date	Task
June 29, 2001	Sent preliminary letters to the state commissions in the states in which Telcordia was administering trials, informing them that the National PA is working with Telcordia and the LLC on a transition to NeuStar, and advising them of the regulatory contacts at NeuStar.
July 27, 2001	Proposed schedule was finalized with Telcordia and the NAPM LLC.
July 30, 2001	Proposed schedule was emailed to states with follow-up telephone calls made by Regulatory/Compliance Manager to each. No adverse comments from NC, TN, WA, and IA. No return calls from VA or CA, so additional contacts were initiated.
August 6, 2001	Held a conference call with the Tennessee Public Service Commission and affected industry representatives to advise them of the transition schedule and to solicit comments.
August 7, 2001	Held a conference call with the Iowa regulatory commission and affected industry representatives to advise them of the transition schedule and to solicit comments.
August 8, 2001	Held a conference call with North Carolina and Washington state regulatory commissions and affected industry representatives to advise them of the transition schedule and to solicit comments
August 8, 2001	Held a conference call with the California Public Utilities Commission staff to discuss the transition. NeuStar agreed to send a letter regarding the proposed transition schedule to the Commission, and to serve that letter on all parties to the relevant docket within the next couple of days. The Commission staff suggested that the Commission could get an Order out that week approving the transition.
August 10, 2001	Held conference call with the California Commission and industry. At the conclusion of the call, California advised that it would anticipate issuing an order on August 20.
August 20, 2001	Transition of state pooling trials from Telcordia to NeuStar completed for the states of Tennessee, Iowa, North Carolina, Washington, and California.
October 4, 2001	Held a conference call with the Virginia regulatory commission and affected industry representatives to advise them of the transition schedule and to solicit comments
October 11, 2001	Order from Virginia Commission issued transferring number pooling administration responsibilities to NeuStar from Telcordia.
October 15, 2001	Transition of Virginia trials completed.

The following table shows all of the NPAs transitioned from Telcordia and how many rate centers are in each NPA pool.

Telcordia state trial NPAs and number of rate centers affected by the transition

State	CA	CA	CA	IA	IA	NC	NC	TN	TN	VA	VA	VA	WA
NPA	916	323	925	515	641	704	919	615	901	540	757	804	509
# of pooled rate centers	16	12	17	6	1	37	34	36	43	121	28	82	52

It should be noted that no thousand blocks had to be transitioned.

2.3 Pooling Administration System (PAS)

2.3.1 Development of system

Development of a fully functional and operational PAS was completed in accordance with Section 3.18 of the *Thousands-Block Contractor Technical Requirements* within nine months after contract award. The National PA developed the automated PAS, which reduces paper work and saves processing time for service providers.

Much of the PAS functionality is available via the pooling website, and is summarized in the following table. The website is the National PA gateway to pooling administration services.

National pooling website (<http://www.nationalpooling.com>)

Category	Content
Reports	<ul style="list-style-type: none"> • • • • • • •
Forms	<ul style="list-style-type: none"> • • • •
Timeline	<ul style="list-style-type: none"> •
Documents	<ul style="list-style-type: none"> • • • • •
Meetings	<ul style="list-style-type: none"> •
Reclamation	<ul style="list-style-type: none"> • • •
Wireless	<ul style="list-style-type: none"> •
UNP	<ul style="list-style-type: none"> •

2.3.2 Transition of all state pooling trials to the PAS

All state pooling trials were successfully transitioned to the PAS by March 18, 2002. See the table below for all of the state trials that were moved from the state system to the PAS.

State pooling trials transitioned to PAS

State	NPA(s)	Transition date
Arizona	480	3/14/02
Arizona	602	2/14/02
California	323	8/25/01
California	510	6/29/01
California	562	11/24/01
California	619	10/27/01
California	707	3/1/02
California	805	2/1/02
California	858	12/29/01
California	916	7/28/01
California	925	9/29/01
Florida	386	7/16/01
Florida	813	1/14/02
Florida	941	2/11/02
Florida	561 & 772	9/17/01
Indiana	317	12/1/01
Indiana	219 & 260 & 574	1/1/02
Iowa	515	8/15/01
Iowa	641	8/15/01
Maryland	240/301	8/15/01
Maryland	443/410	9/15/01
Massachusetts	413	8/1/01
Massachusetts	508	3/1/02
Massachusetts	617	4/1/02
Massachusetts	781	1/1/02

State	NPA(s)	Transition date
Massachusetts	978	2/1/02
Michigan	313	2/24/02
Missouri	314	1/22/02
Missouri	816	2/22/02
Nebraska	402	7/1/01
New Jersey	732	2/15/02
New Jersey	848	12/1/01
New Jersey	862	12/1/01
New Jersey	973	1/16/02
New Jersey	201/551	7/31/01
New York	347	4/30/01
New York	607	6/30/01
New York	631	6/30/01
New York	718	8/31/01
New York	917	8/31/01
North Carolina	336	2/15/02
North Carolina	704/980	9/14/01
North Carolina	919/984	10/26/01
Oklahoma	405	3/14/02
Oregon	541	7/1/01
Oregon	503/971	12/1/01
Pennsylvania	570	2/28/02
Pennsylvania	717	3/14/02
Pennsylvania	412/878	10/29/01
Pennsylvania	724/878	10/29/01
Tennessee	615	3/14/02
Texas	210	10/1/01
Texas	281	12/1/01

State	NPA(s)	Transition date
Texas	713	1/1/02
Texas	832	11/1/01
Virginia	757	10/12/01
Virginia	540&276	11/2/01
Vermont	802	5/1/02
Washington	360	2/15/02
Washington	509	1/8/02
TOTAL NPAs	72	

2.3.3 Contract Data Requirement List (CDRL)

All CDRL documents were filed with the FCC in accordance with Section 4 of the Thousands-Block Contractor Technical Requirements.

CDRL table

CDRL number	Description	Technical requirements section
4.1	Implementation/Telcordia transition plan	2.10.8.1(2)
4.2	Security plan	3.1
4.3	System documentation plan	3.19
4.4	Disaster/Continuity of operations	3.17
4.5	Statistical forecasting plan	2.14.3
4.6	Management reporting plan	3.11
4.6.1	Annual	2.18.1
4.6.2	Semi-annual reports	
4.6.2.1	Forecasted demand	2.14.1
4.6.2.2	Rate area inventory pool status	2.18
4.6.3	Quarterly	
4.6.3.1	Pooling matrices	2.18.2
4.6.4	Monthly	
4.6.4.1	Thousands block pooling	2.18
4.6.4.2	System performance	2.19
4.6.4.3	Staffing	2.3

CDRL number	Description	Technical requirements section
4.6.5	By request	2.19.3
4.7	System acceptance plan	3.12
4.8	Quality assurance plan	2.19.3
4.10	Maintenance plan	3.6

2.3.4 Training—industry and regulatory

NeuStar facilitated the following training for industry and regulatory personnel:

- PAS Service Provider Training – three hours
 - March 11, 2002 – Washington DC
 - March 13, 2002 – Chicago, IL
 - March 15, 2002 – Concord, CA
 - Two PAS training sessions for the FCC were held on March 26 and April 18, 2002
 - PAS Regulatory Training – two hours
 - April 2, 2002 – conference call
- Training was conducted prior to implementation of the first NPA for state regulatory personnel in 11 states where there had been no prior experience with number pooling. Regulatory personnel were consulted to determine whether or not the First Implementation Meeting (FIM) and training session should be in-person or via conference call depending on their schedules and level of knowledge. (See Attachment #1 for a sample presentation)
 - In-person meetings – Alabama, Hawaii, Kentucky, and Nevada
 - Conference call meetings – Alaska, Arkansas, Idaho, Kansas, South Carolina, Wisconsin, and West Virginia
- Four (4) pooling update conference calls were held for state regulatory personnel throughout the year to apprise them of the status of pooling issues: April 2, May 2, August 7, and November 6, 2002.

2.3.5 Testing of the PAS by industry

The agenda for the user acceptance testing (UAT) of the PAS was held February 25-27, 2002. UAT occurred daily for three hours as outlined in the table below. A representative cross section of the telecommunications industry participated in the sessions, with 7 companies providing approximately 16 personnel to do the testing. The participating companies were AT&T, Focal, Voicestream, Sprint PCS, SBC, Verizon, and Verizon Wireless. These companies represent the ILEC, CLEC, and Wireless components of the industry.

Day	Agenda items
Day 1	<ul style="list-style-type: none"> • • • •
Day 2	<ul style="list-style-type: none"> • • •

Day	Agenda items
Day 3	<ul style="list-style-type: none"> • Submitting a new request for a full NXX to establish an LRN • • • • • •

2.3.6 Cutover weekend

System cutover took place the weekend of March 15-17, 2002. As shown below, staff from the Concord, CA office worked tirelessly throughout the weekend until the PAS was turned up and functional for business on Monday morning, March 18, 2002.



Joe Rano, QA Manager and Rudy Amparano, Project Manager



Brandon Baldwin, Database Administrator

Success, the system is live!

The screenshot shows the NeuStar Number Pool Administration website. The browser title is "NeuStar Number Pool Administration - Microsoft Internet Explorer". The address bar shows "http://www.nationalpooling.com/". The website content includes a navigation menu with links like "Reports", "Forms", "Timeline", "Documents", "Meetings", "Reclamation", "Wireless", and "Home". A "Special Notice: May 8, 2001" is prominently displayed, along with several "NEW" announcements regarding user acceptance test results, customer support, and wireless NBP information. At the bottom of the browser window, a status bar displays the text: "Monday 3/18 07:00 'Success, the system is live'".

2.3.7 Summary of monthly thousands block pooling reports

The following is a summary of the 2002 monthly thousand-block pooling reports, which shows the total number of applications processed by the National PA.

Report month	Period covered	Approved	Denied	Suspended	Total
April, 2002	3/15-3/31 2002	120	Not Measured	2	122
May, 2002	4/1-4/30 2002	565	66	15	646
June, 2002	5/1-5/31 2002	781	123	6	910
July, 2002	6/1-6/30 2002	934	158	160	1252
August, 2002	7/1-7/31 2002	765	227	214	1206
September, 2002	8/1-8/31 2002	1214	146	270	1630
October, 2002	9/1-9/30 2002	1253	155	215	1623
November, 2002	10/1-10/31 2002	1243	276	215	1734
December, 2002	11/1-11/30 2002	2936	462	499	3897
January, 2003	12/1-12/31 2002	1491	357	280	2128

2.4 Pooling implementation schedule and meetings

Implementation (rollout) schedule

On a quarterly basis, a pooling rollout schedule is posted to the National PA website at least one month prior to the beginning of the implementation meetings for that quarter. Each quarterly schedule was developed using the following criteria:

- Implementation dates were distributed as evenly as possible throughout the quarter by region;
- Specific industry provider requests were accommodated as far as possible;
- Multiple NPAs were combined in a single implementation meeting for each state;
- No more than three implementation meetings per week were scheduled;
- The minimum time interval between implementation meetings and pool start was 90 days; and
- FCC staff approval was obtained prior to distributing each quarter's schedule.

Implementation meetings

According to the FCC Order that provided the quarterly implementation schedule, National PA held 72 separate implementation meetings for a total of 111 NPAs during 2002. Prior to each implementation meeting, National PA implementation managers prepared detailed information and posted it to the National PA website, including rate center lists, code holder lists, and various other relevant materials for meeting participants. A complete list of interested parties was contacted at least one month prior to the meeting regarding meeting details (place, time, conference bridge information). In some cases, state regulatory personnel were provided a special informational session prior to the implementation meeting. See attachment 1 for a sample presentation. At the implementation meeting, the primary results were:

- Consensus agreement by all industry representatives of all implementation timeline milestone dates for pooling in a specific NPA;
- Consensus agreement by all industry representatives of the rate centers to be included in pooling on a mandatory basis (pooling capable and within a top 100 MSA) and those that are included on an optional basis (pooling capable but outside a top 100 MSA);

- Discussion of service providers to be included in pooling; and
- Miscellaneous additional information
 - Metropolitan Statistical Area (MSA)/Rate Center Associations
 - Updates of INC guidelines
 - Updates of FCC orders
 - New website information available
 - Discussion of timeline milestones when necessary or requested.

2.5 MSA database

Per the requirement that rate centers be identified with a specific political boundary, i.e., a Metropolitan Statistical Area (MSA), it was required that the National PA develop a method for determining which rate centers were encompassed by which MSA. Since rate center boundaries and MSA boundaries are not coincident, this required the development of a data source based on mapping technology. The National PA obtained a preliminary database from Geographic Data Technology (GDT) that provides a mapping of rate centers to an MSA. The National PA updated and verified this database and utilized it in its development of rate centers in the top 100 MSAs for implementation meetings. Thus far, the National PA has been successful in determining and verifying this relationship using the National PA MSA database.

MSASampleQuery



NPA 310

RC ABBRE AVALON

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1
M	VENTURA CA	72

RC ABBRE BEVERLYHLS

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE CMTN CMTN

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE CMTN GRDN

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE CULVERCITY

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE EL SEGUNDO

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE HAWTHORNE

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE INGLEWOOD

STATUS	MSANAME	MSA Rank
M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	LOMITA		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	MALIBU		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1
	M	VENTURA CA	72

RC ABBRE	REDONDO		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	SAN PEDRO		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	SNMN MRVS		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	SNMN SNMN		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	TORRANCE		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

RC ABBRE	W ANGELES		
	STATUS	MSANAME	MSA Rank
	M	LOS ANGELES-LONG BEACH CA	1

2.6 Rate center files

With the receipt of the FCC national rollout Order (April 24, 2002), it was determined at First Implementation Meetings (FIMs) that some service providers wished to participate in pooling in rate centers outside the top 100 MSAs. Since pooling was only required in those rate centers that were pooling capable inside the top 100 MSAs, the National PA established optional pools in those rate centers outside the top 100 MSAs where service providers were already capable of pooling. In so doing, it became apparent that the National PA needed to keep track of which rate centers were mandatory and which were optional. Therefore, the National PA developed a series of valid rate center files for each NPA in which pooling had been implemented. These rate center files have been prepared, verified, and posted to National PA's website for public viewing (specifically for service providers, NANPA, and regulatory agencies).

The following table is a sample rate center file for the California 310 NPA, which contains the rate centers, the associated Top 100 MSAs, and the status of the rate centers in the pool (i.e. mandatory, optional or excluded).

Pooling Rate Center Listing

State: California

Pool Start Date: 03/18/00

NPA: 310

Rate Center Abbreviation	Rate Center Full Name	Geographic NPA Association	FCC Top 100 MSA Name	Pooling Status		
				Mandatory (M)	Optional (O)	Excluded (X)
AVALON	AVALON	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
BEVERLYHLS	BEVERLY HILLS	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
CMTN CMTN	COMPTON: COMPTON DA	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
CMTN GRDN	COMPTON: GARDENA DA	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
CULVERCITY	CULVER CITY	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
EL SEGUNDO	EL SEGUNDO	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
HAWTHORNE	HAWTHORNE	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
INGLEWOOD	INGLEWOOD	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
LAKESWOOD	LAKESWOOD	562	Los Angeles--Riverside--Orange County, CA CMSA			X
LOMITA	LOMITA	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
LSAN DA 01	LOS ANGELES: DA 01	213	Los Angeles--Riverside--Orange County, CA CMSA			X
LSAN DA 14	LOS ANGELES: DA 14	323	Los Angeles--Riverside--Orange County, CA CMSA			X
MALIBU	MALIBU	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
REDONDO	REDONDO	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
SAN PEDRO	SAN PEDRO	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
SNMN MRVS	SANTA MONICA: MAR VISTA DA	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
SNMN SNMN	SANTA MONICA: SANTA MONICA DA	310	Los Angeles--Riverside--Orange County, CA CMSA	M		

Pooling Rate Center Listing

State: California
NPA: 310

Pool Start Date: 03/18/00

Rate Center Abbreviation	Rate Center Full Name	Geographic NPA Association	FCC Top 100 MSA Name	Pooling Status		
				Mandatory (M)	Optional (O)	Excluded (X)
TORRANCE	TORRANCE	310	Los Angeles--Riverside--Orange County, CA CMSA	M		
W ANGELES	WEST LOS ANGELES	310	Los Angeles--Riverside--Orange County, CA CMSA	M		

Date Prepared: 07/10/02
 BHA

2.7 Native block pooling

National PA proposed wireless native block pooling (NBP) to allow wireless SPs to ease into pooling and keep up with the national thousands-block pooling roll-out, in the months prior to their actual participation in pooling. Using NBP, wireless SPs participated in FIMs, and followed all pooling procedures and reporting requirements consistent with the INC Guidelines, up to the point of block donation. Then, their respective block donations and requests were manually controlled into and out of each SP’s own discrete pool, until the wireless industry’s networks were ready for numbers from a single NXX to be shared across multiple SPs.

The process had no NPAC impact, and did not require wireless carriers to port numbers. However, it did provide both the wireless carriers and the National PA the ability to deal with the vast amount of data involved in the transition to pooling in a more orderly and uniform manner than would otherwise have been possible.

The National PA actively participated in drafting the two documents produced by the Wireless Number Pooling Task Force: Native Block Pooling Procedures and the Wireless Transition Plan to Thousands-Block Number Pooling. In addition to encouraging wireless carriers to participate in the national pooling FIMs, the National PA also conducted a series of seven (7) FIMs to enable the wireless carriers to implement NBP in the over-170 NPAs that had begun pooling under state trials. The first of these FIMs was held in conjunction with the January 2002 meeting of the Wireless Number Pooling Task Force in Orlando, Florida. The remaining six were conducted at three-week intervals from March 1, 2002 to June 14, 2002. Subsequent to each FIM, the National PA would set up a pool for each participating carrier for each applicable rate center, and administer the paper flow of block donations and requests, educate the carriers in the use of the forms, and work through some of the technical issues that are unique to the wireless industry.

Following is a final summary of the NBP donation and assignment activity:

Native block pooling summary

Activity	Total
Total blocks donated to pool	5674
Contaminated donations	1590
Blocks assigned	670 (23 retained)
Contaminated blocks assigned	7 (9 retained are contaminated)

2.8 Grandfathered codes

While engaged in area code relief involving geographic splits of NPAs, some states have allowed wireless carriers to keep CO codes from the original NPA in a rate center geographically located in the new NPA. These wireless CO codes are designated in the Local Exchange Routing Guide (LERG) as being in the original NPA, but they are actually assigned in a rate center that is in the new split NPA. These are what are referred to as “grandfathered codes.” The rate center to which they are assigned will appear in the LERG in both NPAs—one consisting of wireline NXXs and one consisting of wireless NXXs. How those codes are treated for call routing and billing purposes can have varying impacts on the National PA, the carriers, and the end-users.

In a normal pooling environment, all LNP-capable service providers donate their spare thousands-blocks to the National PA, to be subsequently assigned to any service provider who needs numbering resources in that rate center. As more and more service providers participate in pooling, the process leads to a more efficient use of numbering resources. However, there are significant technical difficulties in incorporating grandfathered codes into a pool such as re-homing CO codes, routing issues, software changes to the network, and switch translations.

At the request of the California Public Utilities Commission (CPUC), the PA held two conference call meetings with the CPUC and the industry, in August and September 2002. All parties involved obtained some additional insight into the situation. There appear to be a limited number of possible ways, individually or in combination, to deal with the grandfathered codes:

- The National PA could maintain two separate pools for that rate center, one for the wireless service provider CO codes grandfathered from the original NPA, and one for the remaining service provider CO codes in the new NPA (which could be both wireline and wireless codes).
- The National PA could merge the blocks from the grandfathered codes into the general pool, thus making the grandfathered codes available to the wireline carriers as well.
- Thousands-blocks from grandfathered codes could be donated to the National PA but marked as non-pooling-capable.
- The codes could be re-homed to a rate center that is appropriately associated with the NPA of the CO codes.
- Grandfathered codes could be eliminated by a number change. A number change would be required where that particular NXX code has already been assigned to another service provider in the new NPA.
- The optimum method of dealing with the issues may be a single process, or may be a combination of approaches, depending on the carrier, the number of codes involved, the number of end users on the code, and/or the proximity of an appropriate rate center of the correct NPA.

The National PA worked with the CPUC to provide the commission and the industry additional information regarding the number and location of grandfathered codes in California. Additionally, the National PA has advised the FCC of the issues as they relate to pooling, and is not pooling grandfathered codes, pending further regulatory direction and guidance.

State regulatory authorities affected by this issue were notified by email of the affected rate centers and they verified the data for their states.

Compilation of CO codes assigned in NPAs not associated geographically with the rate center

This compilation is derived from LERG data and other geographic rate center data to determine a master list of CO codes that are assigned to a rate center/NPA combination that is not geographic in nature. In a variety of circumstances, CO codes are assigned to rate centers that are not in the geographic boundaries of the NPA to which it is assigned. Examples include:

- Grand fathering of wireless CO codes in an NPA split
- Statewide-type CO codes (mass calling, time, weather, etc.)
- Other unknown reasons.

The list shown in the following two tables is a master list that does not predetermine the reasons for CO codes being assigned to a rate center/NPA combination, except in cases where the LERG describes the reason (e.g., time, mass calling). This list has been summarized in two similar ways: by NPA and by state. In each summary, the list is divided into multiple columns. The definition of each column is contained in the legend below.

Count of CO codes not in correct geographic NPA -October 2002 LERG

Count of NXX	Status										
LOC STATE	EC	EP	GC	GP	OM	OO	OT	UC	UP	Grand Total	
AL	41	2								43	
AZ			7	1						8	
CA			54	23	11	6	13	20	13	140	
IL			367	139	4	11				521	
MA			42							42	
MD						1				1	
MI	168		1	7		1	3			180	
NJ			182	25	4					211	
NV				1			2			3	
NY			61	24	2					87	
PA			24	1			1			26	
TX									1	1	
VA	52								1	53	
VM						1		1	3	5	
Grand Total	261	2	738	221	21	20	19	21	18	1321	

- EC Extended permissive - cellular and PCS - pooling capable SPs
- EP Extended permissive - paging - not pooling capable SPs
- GC Grandfathered - cellular and PCS - pooling capable SPs
- GP Grandfathered - paging - not pooling capable SPs
- OM Other codes - mass calling/high volume calling
- OO Other codes - other (miscellaneous LEC codes)
- OT Other codes - time/weather
- UC Unknown reasons - cellular / PCS - pre-NANPA
- UP Unknown reasons - paging - pre-NANPA

2.9 Transition of wireless carriers to pooling

2.9.1 Summary

When the FCC directed wireless service providers to participate in thousands-block pooling effective November 24, 2002, the North American Numbering Council (NANC) set up a Wireless Pooling Task Force (WPTF) with the mission of developing detailed processes and procedures to facilitate the transition. Simultaneous with NBP [Section 2.7], National PA actively participated in the design and development of the transition plan and worked with the carriers nationwide to ensure that the transition would be transparent to end-users.

Although the transition period to traditional pooling formally commenced in early August, 2002, when wireless carriers filed their forecast and donation forms, the preparations started long before that, as carriers worked through the technical and operational support systems (OSS) steps necessary to implement pooling. The National PA worked with those carriers that were easing the transition through the use of NBP, and facilitated the process for all carriers, interfacing with the NPAC to resolve any prerequisites to intra-service provider porting, providing testing, and answering the myriad of other questions that arose. In July 2002, in conjunction with a meeting of the WPTF, National PA conducted an educational meeting in lieu of a FIM for non-NBP carriers. By August 14, 2002, all wireless service providers had submitted forecast and donation forms for all NPAs with pool start dates prior to November 24, 2002. As of November 1, 2002, wireless carriers in pooling NPAs had donated 17,301 blocks.

The National PA then had assessed all existing pools, aggregating the wireline inventory with the wireless donations and forecasts, and completed its assessment of all pooled NPAs by September 4, 2002. LERG assignees were found for the new codes required, to ensure that carriers would have adequate resources through the holiday season, when wireless carriers have a spike in demand.

Additionally, the National PA kept state regulatory authorities apprised of the progress of the transition. In addition to having conference calls to educate them, the National PA staff fielded frequent questions from state regulatory personnel regarding wireless pooling in their respective states.

2.9.2 Assessment

Attachment 2 is a table of the pooling assessment for 2003 for the pools in all NPAs including wireless carriers. This assessment includes the needs of both wireline and wireless carriers for 2003 for the entire pool, as well as the first month that it is anticipated an NXX code would need to be opened to meet industry forecasts. The data file includes only rate centers where codes will be needed, based upon the forecasts and donations. If the NPA shows "NONE," that means that the National PA reviewed the NPA and no codes are expected to be needed.

2.10 CO code reallocation process

National PA has worked with the INC and the Local Number Portability Administration Working Group (LNPA WG) to establish a process for the industry to reallocate codes when service providers either return a code or go out of business. Attachment #3 is the final copy of the LNPA WG document.

2.11 Presentations

National PA, as a leader in number optimization efforts, has been asked to make presentations at numerous industries and state regulatory meetings during the year. For example:

- In January 2002, National PA gave a presentation at a Cellular Telecommunications and Internet Association (CTIA) Critical Issues Forum on issues related to National Thousands-Block Number Pooling Services. In this presentation, National PA staff members, Mr. Barry Bishop and Ms. Amy Putnam, discussed many of the issues related to the wireless transition to thousands-block pooling, including which MSAs would be subject to mandatory pooling, and gave an explanation of the benefits and processes for implementing NBP. They walked the carriers through the steps required to deploy traditional pooling, compared them to the steps required for NBP, and reviewed the content and materials typically presented at a FIM. A copy of this presentation is provided as Attachment #4.
- In June 2002, National PA offered a presentation on thousands-block number pooling at an educational forum sponsored by the Pennsylvania Public Utility Commission (PUC) and the Pennsylvania Bar Institute, and attended by the Commissioners and the PUC staff, and representatives of industry. In it, Ms. Amy Putnam discussed the national pooling rollout, existing national pooling parameters, and the status of pooling in Pennsylvania. She also gave an update on wireless pooling and an explanation of the method and status of NBP nationwide. A copy of this presentation is provided as Attachment #5
- In December 2002, National PA presented a program to the West Virginia Telephone Association, entitled Local Number Portability and Pooling: Working Toward Number Conservation. In it, Ms. Amy Putnam reviewed the basics of LNP, and discussed what an LRN is, who is required to be LNP-capable and why, what a bona fide request (BFR) is and what it means to a non-LNP-capable carrier, and how all these concepts relate to the deployment of thousands-block pooling. She also discussed the status of pooling in West Virginia, and reviewed the recently filed USTA Ex Parte related to the elimination of the BFR process. A copy of this presentation is provided as Attachment #6.

2.12 Unassigned number porting (UNP)

The modified UNP trial started in Connecticut's 203 and 860 NPAs on November 1, 2002. The trial is administered by National PA at the *tens-block* level. The UNP guidelines were developed by the industry with National PA's assistance, and a web page was developed by National PA for the applications to be submitted. National PA has set aside one thousands block for each rate center for each of the two NPAs for the purpose of this trial. As of January 1, 2003 there have not been any tens-blocks assigned.

Following is a description of the trial from a letter submitted by the CT commission to William Mahern:

CTDPUC intends to commence a two-phased UNP trial beginning on November 1, 2002, that will be open to all providers certified to offer telecommunications services in the state. This trial was designed by the participating service providers to allow for maximum voluntary participation and employs the use of a surrogate form of UNP during Phase I and the actual porting of individual telephone numbers between service providers during Phase II. Specifically, during Phase I, a surrogate UNP trial will be conducted for three months wherein participating carriers would request telephone numbers (TN) from the industry's pooling inventory. At the conclusion of the three-month period, CTDPUC and the industry group will review the data in order to determine whether to conclude the trial, continue Phase I or immediately move to Phase II of the trial. During Phase II, carrier to carrier exchanges of TNs in inventory for use by the receiving carrier for growth or footprint resources would occur wherein participating service providers will request telephone numbers from each other providers' inventories that would not involve a third party administrator.

2.13 Issue Management Group (IMG) on CA petition for increased contamination levels

National PA pooling staff participated in the drafting of the NANC IMG report on the California Public Utilities Commission (CPUC) petition to increase permitted contamination of pooled blocks to 25 percent from the current 10 percent. Should the FCC decide to accept the increase in contamination level, there would be no additional impact on the National PA, or PAS. NeuStar developed the PAS with the flexibility to accommodate this change at no additional charge.

2.14 TX extended area service (EAS) issue

An order issued October 19, 2001 in Public Utility Commission of Texas (PUCT) Docket No. 24186 directed National PA, as the Thousands-Block Pool Administrator, to keep EAS-identified thousands-blocks segregated from other thousands-blocks in the pool, and to replenish either the "EAS pool" or the "non-EAS pool" to maintain a sufficient level of inventory to fulfill any pooling participant's request for either type of thousands-block. Because National PA believes that this process is not consistent with the NRO Order or with procedures mandated for reporting utilization, and it cannot be administered in an environment where carriers and the Pooling Administrator file accurate months-to-exhaust forms, National PA filed a Request for Reconsideration, on November 23, 2001. To date, this request has not been addressed by the PUCT. The PA also advised the FCC of the position it felt legally obligated to take under the circumstances.

On March 5, 2002, the PUCT conducted a workshop on this matter that was attended by industry and National PA.

3. Identification of existing and potential pooling areas

NeuStar has divided this section into two subsections to better illustrate our commitment to developing existing and future pooling areas (rate centers). *Section 3.1* provides a detailed listing of all pooling areas (rate centers) existing as of December 31, 2002, while *Section 3.2* provides a detailed listing of pooling areas (rate centers) with pooling capability in NPAs to be implemented in 2003.

3.1 Identification of existing pooling areas

Following is a summary by state of the number of pooling areas (i.e., rate centers) that were implemented by December 31, 2002.

Mandatory – Top 100 MSAs and mandatory pooling for all pooling-capable carriers;

Optional – contains pooling-capable carriers in rate centers not within a Top 100 MSA where industry reached a consensus to establish voluntary thousands block pooling;

State Trial Mandatory – ordered to be mandatory by a state regulatory authority prior to the national rollout; may or may not be in a Top 100 MSA;

Excluded – contains no pooling-capable carriers.

The data file (labeled 3.1) with details about each rate center within each NPA can be found in the enclosed CD-ROM.

Implemented pooling rate centers (areas)

State	Mandatory	Optional	State trial mandatory	Excluded	Grand total
AL	30	38		55	123
AZ	9	11		20	40
CA	416	155	62	109	742
CO	16		1	5	22
CT	72		18		90
DC	1				1
DE	7	23			30
FL	125	34	19	26	204
GA	64	14		4	82
HI	1	6			7
IA	26	107		434	567
ID	5	57		85	147
IL	256	229		115	600
IN	120	86	65	82	353
KS	35	2		11	48
LA	28	94		54	176
MA	324		74	19	417
MD	203		71	2	276
ME	7		127	113	247
MI	211	56		90	357
MN	12	45		187	244
MO	100	36	109	331	576

State	Mandatory	Optional	State trial mandatory	Excluded	Grand total
NC	87	12	26	62	187
NE	8	18		262	288
NH	33	1	85	29	148
NJ	251	9		28	288
NM	8	40		114	162
NV	6	36		36	78
NY	351	8	194	245	798
OH	158	139		76	373
OK	52	47	23	153	275
OR	45	11	78	135	269
PA	387	118	109	275	889
RI	25				25
TN	87	30	1	51	169
TX	285	61	7	126	479
UT	12		10		22
VA	125	11	177	87	400
VT			116	25	141
WA	55	3	76	119	253
WI	42	10		8	60
WV	5	148		75	228
Grand Total	4,090	1,695	1,448	3,648	10,881

3.2 Potential pooling areas

Following is a summary of a report that provides a complete listing of all rate centers (pools) in NPAs wherein pooling is yet to be implemented. The full report labeled 3.2 can be found in the enclosed CD_ROM. National PA has determined, for the required purpose of this report, the “pooling potential” of each of these rate centers using the following two criteria:

Potential pooling-capable

- (1) The rate center has at least one Central Office Code that is designated as portable in the LERG; or
- (2) The rate center has at least one Central Office Code that is assigned to a pooling-capable wireless service provider.

Not potentially pooling-capable

The above criteria do not apply. There has been no distinction made in this report regarding the characterization of rate centers as being inside or outside a top 100 MSA, and therefore mandatory or voluntary. National PA experience has shown that a majority of the NPAs implementing pooling to date have included all pooling-capable rate centers outside a top 100 MSA on an optional basis.

Potential pooling rate centers (areas)

State	Potential pooling-capable	Not potentially pooling-capable	Total rate centers not yet in pools
Alabama	133	58	191
Alaska	32	254	286

State	Potential pooling-capable	Not potentially pooling-capable	Total rate centers not yet in pools
Arizona	57	138	195
Arkansas	168	215	383
California	33	1	34
Colorado	98	100	198
Florida	69	40	109
Georgia	122	199	321
Illinois	259	179	438
Indiana	133	38	
Iowa	46	200	246
Kansas	143	383	526
Kentucky	290	79	369
Louisiana	69	40	109
Michigan	232	93	325
Minnesota	109	295	404
Mississippi	178	61	239
Missouri	89	66	155
Montana	75	185	260
Nebraska	37	143	180
Nevada	12	7	19
North Carolina	192	59	251
North Dakota	62	238	300
Ohio	513	184	697
Oklahoma	91	164	255
Puerto Rico	10	89	99
South Carolina	158	83	241
South Dakota	70	203	273
Tennessee	92	78	170
Texas	462	451	913
Utah	49	70	119
Washington	10	4	14
Wisconsin	254	289	543
Wyoming	49	43	92
Grand Total	4,396	4,729	9,125

4. Aggregated total by pool of the service providers participating in the pooled area

Following is a summary of the full report of aggregated total by pool of the service providers participating in the pooled area. Due to its file size the full report can be found as a zip file labeled '4_SPs participation in pooling' in the enclosed CD-ROM.

There are 1,159 distinct service providers participating in number pooling in 4,838 rate centers (i.e. pooled areas) in 187 individual NPAs in 42 states.

State	NPA	Number of RCs	Number of SPs/NPA
AL	205	50	25
AL	251	16	25
AZ	480	1	27
AZ	520	17	22
AZ	602	1	29
AZ	623	1	19
CA	209	51	26
CA	213	3	26
CA	310	16	35
CA	323	12	29
CA	408	12	34
CA	415	14	31
CA	510	13	30
CA	530	87	28
CA	559	49	22
CA	562	9	29
CA	619	11	28
CA	626	10	31
CA	650	16	27
CA	707	75	33
CA	714	13	34
CA	760	79	32
CA	805	43	30
CA	818	16	33
CA	831	22	19
CA	858	8	25
CA	909	41	29
CA	916	17	25
CA	925	17	26
CA	949	7	25
CO	303	11	32
CO	720	11	30
CT	203	33	31
CT	860	60	26

State	NPA	Number of RCs	Number of SPs/NPA
DC	202	1	32
DE	302	30	24
FL	305	12	34
FL	321	22	32
FL	352	35	19
FL	386	18	22
FL	407	17	30
FL	561	7	35
FL	727	5	26
FL	754	5	25
FL	772	8	27
FL	786	4	26
FL	813	8	33
FL	904	18	35
FL	941	24	27
FL	954	5	38
GA	404	1	33
GA	678	39	43
GA	770	39	33
HI	808	6	11
IA	515	41	15
IA	641	32	13
IA	712	116	17
ID	208	68	24
IL	224	42	25
IL	312	5	25
IL	618	166	33
IL	630	30	28
IL	708	35	26
IL	773	11	25
IL	815	163	33
IL	847	44	30
IN	219	36	22
IN	260	52	18
IN	317	26	27
IN	574	42	21
IN	765	104	25
KS	316	25	20
KS	913	21	23
LA	318	51	19
LA	504	8	20
LA	985	41	22

State	NPA	Number of RCs	Number of SPs/NPA
MA	339	40	27
MA	413	59	24
MA	508	85	31
MA	617	20	34
MA	774	85	31
MA	781	40	29
MA	857	20	29
MA	978	57	32
MD	240	57	37
MD	301	57	29
MD	410	100	32
MD	443	101	42
ME	207	115	21
MI	248	22	28
MI	313	6	30
MI	517	54	31
MI	586	11	20
MI	616	101	26
MI	734	34	42
MI	810	46	28
MI	947	18	10
MN	507	32	20
MN	612	1	29
MN	651	12	23
MO	314	7	26
MO	573	83	25
MO	636	46	24
MO	660	34	15
MO	816	55	24
NC	336	37	30
NC	704	47	40
NC	919	34	35
NC	980	46	30
NE	402	24	19
NH	603	118	34
NJ	201	25	38
NJ	551	22	26
NJ	609	47	31
NJ	732	36	33
NJ	848	36	26
NJ	856	33	29
NJ	862	36	32

State	NPA	Number of RCs	Number of SPs/NPA
NJ	908	43	34
NJ	973	38	40
NM	505	48	19
NV	775	15	16
NY	212	3	30
NY	315	70	28
NY	347	13	26
NY	516	14	34
NY	518	61	27
NY	585	43	19
NY	607	21	21
NY	631	53	30
NY	646	3	29
NY	716	44	29
NY	718	13	37
NY	845	84	36
NY	914	30	38
NY	917	15	26
OH	440	54	34
OH	740	111	25
OH	937	96	23
OK	405	55	22
OK	918	49	23
OR	503	38	32
OR	541	79	28
OR	971	32	29
PA	215	36	30
PA	267	36	30
PA	412	27	24
PA	484	73	37
PA	570	86	24
PA	610	73	41
PA	717	65	26
PA	724	100	33
PA	814	111	24
PA	878	98	31
RI	401	25	25
TN	423	44	33
TN	615	35	27
TN	865	29	26
TN	901	8	25
TX	210	1	25

State	NPA	Number of RCs	Number of SPs/NPA
TX	214	43	41
TX	281	44	40
TX	409	28	27
TX	469	43	35
TX	512	33	36
TX	682	13	11
TX	713	44	39
TX	817	25	29
TX	832	43	32
TX	936	31	20
TX	940	25	23
TX	972	43	37
UT	801	22	24
VA	276	59	19
VA	434	46	20
VA	540	70	28
VA	571	19	28
VA	703	19	34
VA	757	19	24
VA	804	55	28
VT	802	95	18
WA	206	5	31
WA	360	50	37
WA	425	11	32
WA	509	64	29
WI	262	53	24
WV	304	140	22
Total 42	Total 187	Total 4838	Total 1159

5. Forecast results and a review of forecasts versus actual block activation in the past

A report identifying forecast results by NPA and rate center, as well as a review of forecasts versus actual block activation in the past can be found as a zip file labeled '5_PAS forecast results' in the enclosed CD-ROM. This report is provided electronically only due to its size (over 300 pages). In summary, there are:

- 199 NPAs;
- 4,760 rate centers;
- 81,398 forecasted blocks; and
- 6,740 activated blocks.

Based upon this information, we have determined that 8.3% of forecasted blocks are activated.

6. System and performance metrics

As NeuStar’s overall performance as National PA is measured against predetermined system and performance metrics, this section is divided into two subsections in order to better analyze both requirements and outcomes. *Section 6.1* outlines the Pooling Administration System (PAS) performance requirements in Thousands-Block Pooling Contractor Technical Requirements. *Section 6.2* includes a summary of system performance and PAS availability for the period of March 18-December 31, 2002.

6.1 System requirements

System and performance metrics for the Pooling Administration System (PAS) are outlined in Section 3.3.1 of the Thousands-Block Pooling Contractor Technical Requirements.

According to the requirements, the PAS shall, at a minimum, adhere to the following availability and reliability requirements:

Requirement	Performance
Available 24 hours a day, 7 days a week	The system has been available 24 hours a day, 7 days a week subject to the allowable downtime listed below
Availability shall meet or exceed 99.9% of scheduled uptime	Availability meets 99.9% of scheduled uptime
Unscheduled maintenance downtime per any 12-month interval shall be less than nine (9) hours	Unscheduled maintenance downtime has been met with 7 hours, 54 minutes and 26 seconds of downtime
The mean time to repair (MTTR) for all unscheduled downtime per any 12-month interval shall be less than one hour during core business hours and 4 hours for non-core business hours	There have been six (6) instances of unscheduled downtime. Five (5) instances met the MTTR, and one instance of unscheduled downtime during non-core business hours exceeded the MTTR due to an alarm configuration problem. No customer reports were received as a result of missing this MTTR.
Scheduled maintenance downtime per 12-month interval shall be less than 24 hours	No scheduled maintenance downtime has been used

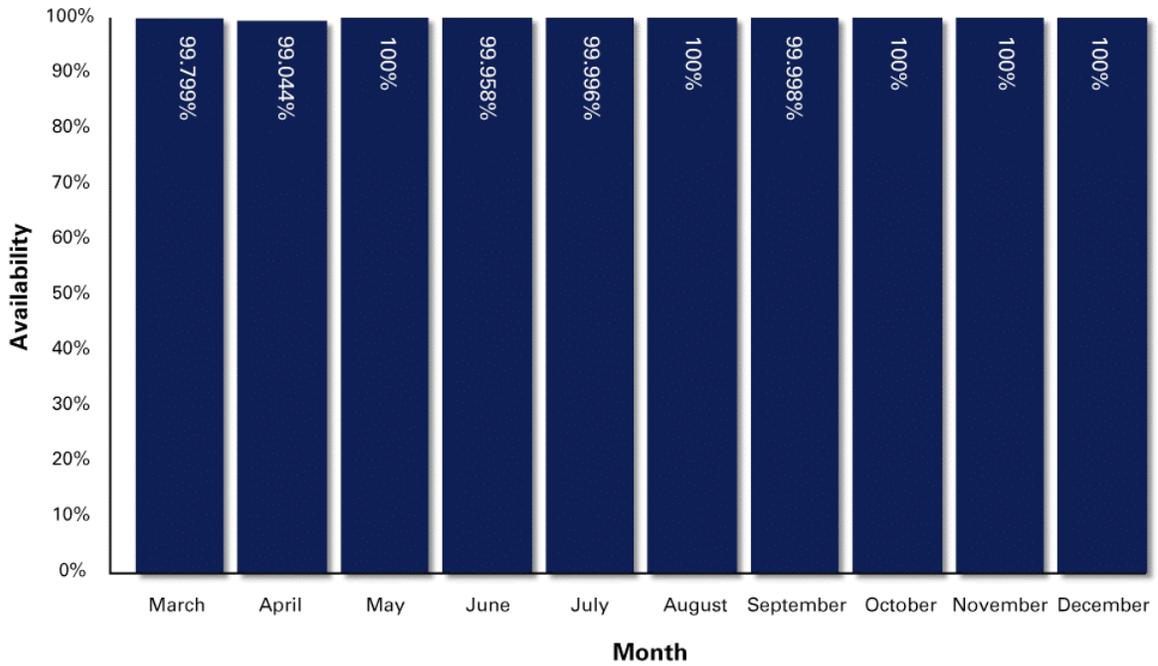
The allowable combination of unscheduled and scheduled downtime equals thirty-three (33) hours per year, of which in less than eight (8) hours have been used. Due to a creative maintenance process and National PA advanced network architecture, no downtime has been needed or used for maintenance, resulting in increased reliability and substantial overall availability of the system to end users.

6.2 2002 PAS performance

Annual system performance report for 03/18/02 – 12/31/02

Hours/minutes of availability			
6,928 hours 5 minutes 34 seconds			
Scheduled maintenance			
None			
Number and duration of instances of unavailability			
Number of instances of unavailability: 6			
Duration of instances of unavailability: 7 hours 54 minutes 26 seconds			
Percent of time the system was available			
99.9%			
Busy hour usage by GMT without batch jobs			
10 pm PST	12 am CST	1 am EST	5 am GMT
1,912 simultaneous work items		Date: 07/27/2002	Amount of users: 20
Busy hour usage by GMT with batch jobs			
12 am PST	2 am CST	3 am EST	7 am GMT
2,123 simultaneous work items		Date: 03/16/2002	Amount of users: 4
Comments: Batch jobs are run using an automated process at night to add new work items.			
Maximum number of simultaneous users during any hour without batch jobs			
Max number of users: 24		Date: 12/11/2002	During hour: 9 am PST 11 am CST 12 pm EST 4 pm GMT
Maximum number of simultaneous users during any hour with batch jobs			
Max number of users: 61		Date: 10/10/2002	During hour: 10 pm PST 12 am CST 1 am EST 5 am GMT
Comments: Batch jobs are run using an automated process at night to add new work items.			
Average and maximum holding time			
30 minutes during an active session (due to Security Plan requirements, PAS will time out after 10 minutes of inactivity, following a warning to offer an opportunity to the user to override the time out and not be logged off the system).			

Total PAS availability March 18, 2002 - December 31, 2002 = 99.9%



Source line chart

Month	Actual percent of availability
March	99.799% Average percent using actual of 99.82 and 100 to compensate for partial month.
April	99.044%
May	100%
June	99.958%
July	99.996%
August	100%
September	99.998%
October	100%
November	100%
December	100%
Average	99.9%

7. Status of required transferable property

NeuStar Pooling Administration Services affirms that all required transferable property is available for transfer, as required by the FCC pursuant to FAR requirements.

8. Industry issue identification/feedback

NeuStar's reputation for swift, evenhanded complaint resolution was upheld during its role as National PA during 2001 and 2002. Included in this section is a summary of Change Orders (*Section 8.1*); a discussion of pooling-related North American Numbering Council (NANC) issues (*Section 8.2*); a summary of the two formal complaints that were raised and subsequently resolved (*Section 8.3*); a summary of our three quarterly performance survey responses (*Section 8.4*); and actual feedback received from both regulators and industry (*Section 8.5*).

8.1 Change orders

National PA has filed 17 Change Orders with the FCC since December 2001 addressing a variety of system or process changes that are outside of our current contract with the FCC. Of those 17 change orders, National PA initiated four (4), and 13 were initiated as a result of changes to industry guidelines. The FCC has accepted five (5) change orders, two (2) were withdrawn, two (2) were rejected, and eight (8) are outstanding as of this date.

Change order

Number	Type	Description	Date guidelines published	Deadline	Date to FCC	Notified states	Notified NANC	45-day FCC response deadline	Revision to FCC	Status
1	INC 60 LNPA 328	Allocating blocks back to donating switch	11/30/01	12/28/01	12/28/01	12/28/01		2/13/02		accepted
2	INC 60 LNPA 304	NXXs not open in network by Lerg effective date	11/30/01	12/28/01	12/28/01	12/28/01		2/13/02		accepted
	VECP	Modification to system	N/A	N/A	1/10/02	1/10/02		2/25/02		rejected
3	Native Block Pooling	NBP Administrator			1/29/02	1/29/02		3/15/02		accepted
4	INC LNPA 312	Thousands-block application review	1/25/02	2/22/02	2/22/02	2/22/02		4/8/02		withdrawn
5	INC LNPA 312	Thousands-block application review	1/25/02	2/22/02	2/22/02	2/22/02		4/8/02		withdrawn
6	INC CO NXX 295	Change to selection process of code holder	1/25/02	2/22/02	2/22/02	2/22/02		4/8/02		pending
7	PAS Security	Modification to system	N/A	N/A	3/7/02	3/7/02		4/22/02	6/20/2002	accepted
8	CTPUC UNP	CT UNP trial administrator	N/A	N/A	3/8/02	3/8/02		4/23/02	5/22/2002	accepted
9	3rd R&O	Changes resulting from third R&O	N/A	N/A	3/15/02			4/29/02		rejected
10	INC 62	LNPA 319 Intra-SP Porting	3/22/02	4/21/02	4/21/02	4/21/02		6/3/02		pending
11	INC 62	CO/NXX 195 Final jeopardy procedures	3/22/02	4/21/02	4/21/02	4/21/02		6/3/02		pending
12	LNPA 343	Changes to TBPAG		7/3/02	7/1/02	7/2/02		8/15/02		pending
13	LNPA 356	Mod to user profile application Appendix 5		7/3/02	7/1/02	7/2/02		8/15/02		pending
14	LNPA 360	Mod Part 3 form in TBPAG		7/3/02	7/1/02	7/2/02		8/15/02		pending
15	CO/NNX #327	Update MTE in COCAG		7/3/02	7/1/02	7/2/02		8/15/02		pending
16	LNPA 335	AOCNS performing initial TB entries into BIRRRDS	8/23/02	9/22/02	9/18/02	9/18/02		11/2/02		pending

8.2 NANC issues

At the September 24, 2002 meeting of the NANC, the INC raised an issue about the ability of pooling service providers (SPs) to obtain blocks using the PAS under certain conditions.

The NANC assigned the Number Oversight Working Group (NOWG) to review the issue and make a recommendation. The NOWG reviewed the issue and made a recommendation to the NANC at the November 2002 meeting. That recommendation was subsequently forwarded to the FCC.

Upon request of the FCC, National PA sent comments regarding the NOWG report and a subsequent NOWG “Interim Solution” to the FCC Contracting Office on January 10, 2003.

8.3 Issues raised to the FCC in 2002

Pursuant to Section 2.7 of the Thousands-Block Contractor Technical Requirements, NeuStar has met the requirements to investigate identified problems and respond to the FCC and telecommunications industry participant within a period of not more than 10 business days from the date of the complaint.

Section	Requirements	Compliant?
2.7 Dispute resolution	Disputes may arise within industry numbering activities and the contractor shall participate in dispute resolution by providing guidance and/or historical data.	yes
2.7.1 Responsibilities	The contractor shall, in all cases, follow the FCC rules and pooling guidelines that are in effect at the time that the dispute arises. The contractor shall be responsible for expenses that are incurred in achieving compliance with any law, regulation, audit or contract requirements.	yes
2.7.2 Sources of dispute	These disputes could arise from a variety of sources including the performance of the NANP activities, from industry forum activities, from conflicting government or regulatory policy directives or directly from the FCC.	yes
2.7.3 Involvement	The extent to which the contractor is involved in the resolution of disputes shall depend on the nature and origin of the dispute.	yes
2.7.4 Process	If a performance problem is identified by a telecommunications industry participant, the contractor shall notify the FCC of the problem within one business day. The contractor shall investigate the problem and report back within a period of not more than 10 business days from the date of the complaint, to the FCC and to the telecommunications industry participant on the results of such investigation and any corrective action taken or recommend to be taken.	yes

Section	Requirements	Compliant?
2.7.5 Corrective action	The contractor, in coordination with the FCC, shall take any necessary corrective action within 30 calendar days of the complaint.	yes

During the past 18 months, National PA has responded to two (2) formal letters regarding pooling administration issues. The industry participant sent the first letter directly to National PA. National PA notified the FCC of this issue within one business day and responded to the issue within 10 business days, meeting the standard set in Section 2.7.4 above. The second letter was sent directly to the FCC and was then forwarded to National PA for a response. Our response was made within the timeframe allowed. National PA considers these issues to have been resolved.

Issue 1—Bellsouth

National PA was notified on February 26, 2002 of a letter sent by BellSouth on February 18, 2002 concerning three issues; the scope of pooling; whether pooling is mandatory throughout an NPA and what technical requirements are required for pooling. National PA responded to BellSouth on March 4, 2002 by letter. On March 25, 2002, Randy Sanders of BellSouth sent a letter to National PA stating that the issues in their letter were resolved.

Issue 2—CompuWiz

The FCC sent National PA correspondence from Mr. Larry Manna of CompuWiz on April 5, 2002 and April 9, 2002 regarding his criticism of the information contained on the National PA website. Mr. Barry Bishop sent a response to the explicit issues raised in Mr. Manna’s letters to the FCC on April 10, 2002. No further information has been requested and the issue is considered resolved.

8.4 Performance surveys

On our own initiative, National PA management initiated a quarterly performance survey to be used as an internal management tool. The surveys are meant to assist us with issue identification through user comments. The first survey was sent on May 15, 2002 to service providers only. The second and third surveys were sent on August 9 and October 22, 2002 respectively and included both service providers and state regulatory authorities.

Prospective survey participants were asked to rate National PA performance on a scale of one (1) to five (5), with one (1) being lowest and five (5) being highest. Questions measure performance in the two areas most involved with user interface, Pooling Administration and Implementation.

Questions regarding performance of National PA personnel showed a high level of satisfaction with scores of 4.4 or higher in those questions. While scores on the PAS have dropped in the surveys, they have never gone below 4.0. National PA believes that the drop in score for the PAS may be due in part to the many new users of the system who did not receive initial training. National PA is planning to offer a refresher course on PAS in the 2nd quarter of 2003 to those who may not have been able to attend the initial training.

1Q02	Surveys returned: 36	Average score
	The Pooling Administrators were courteous and helpful.	4.8
	The Customer Support Representative responded to my concerns in a timely manner.	4.5
	The Pooling Administration System supports my needs.	4.3
	Overall, I am satisfied with the level of service provided by Number Pool Administration.	4.5

2Q02	Surveys returned: 50	Average score
	The Pooling Administrators are responsive to my questions.	4.6
	The Pooling Administrators are courteous and helpful.	4.7
	The Pooling Implementation Managers provide detailed information regarding pooling as it relates to the NPA at the First Implementation Meeting.	4.5
	The Pooling Implementation Managers are responsive to questions.	4.5
	The Customer Service Representative is responsive to my questions.	4.4
	The customer Service Representative responded to my concerns in a timely manner	4.5
	The Pooling Administration System supports my needs.	4.1
	Overall, I am satisfied with the level of service provided by Number Pool Administration.	4.3

3Q02	Surveys returned: 49	Average score
	The Pooling Administrators are responsive to my questions.	4.6
	The Pooling Administrators are courteous and helpful.	4.8
	The Pooling Implementation Managers provide detailed information regarding pooling as it relates to the NPA at the First Implementation Meeting.	4.4
	The Pooling Implementation Managers are responsive to questions.	4.5
	The Customer Service Representative is responsive to my questions.	4.5
	The customer Service Representative responded to my concerns in a timely manner	4.6
	The Pooling Administration System supports my needs.	4.0
	Overall, I am satisfied with the level of service provided by Number Pool Administration.	4.1

8.5 Industry feedback

8.5.1 Regulatory feedback

Date	Regulatory agency	Comment
8/9/2002	Nevada PSC Yasuji Otsuka	Linda and Cecilia, I just wanted to express my appreciation to you for coming all the way from TX and CA on July 30 and 31 for educating Nevada Commission Staff on One Thousand-Block Number Pooling and conducting the 775 NPA Pooling First Implementation Meeting. We have definitely benefited from your visit. Thanks again.
8/26/2002	Florida PSC Bob Casey	Good job!
10/3/2002	Kentucky PSC Eric Bowman	Thank you very much Linda. I really appreciate you coming to meet with us yesterday. As I told you then, I believe the meeting was very fruitful
10/21/2002	California PSC Karen Watts-Zagha	Number Pooling Administration staff, Kevin & Shannon, are fantastic about responding to our concerns and resolving any problems that arise. Barry Bishop and Bruce Armstrong are also extremely helpful. The Pooling Implementation Managers generally have done a fine job but in one instance did not have a list of top 100 MSAs for a first implementation meeting. They had been reluctant to contact NANPA for this information even though it was relevant to the meeting, for the reason that NANPA and the PA have to remain separate and distinct. The PA and NANPA should be able to share vital information about number management when the need arises so long as the information is not confidential.
10/23/2002	Maine PUC Trina Bragdon	Kevin Gatchell does an outstanding job. He is knowledgeable, helpful, and courteous. He goes out of his way to get the job done. He does a great job of balancing the letter of law with common sense as well as the desire of carriers to obtain numbers and regulatory restrictions. He's always willing to work with me and the carrier to get the best result. I can't say enough good things about him.
11/6/2002	Nebraska PSC Dick Palazzolo	Thanks Linda, I appreciate the copy...And, you ran a good conf. call this afternoon...

8.5.2 Industry feedback

Date received	Service provider	Comment
1/3/02	ATTWS	Amy, Your awesome. Thanks.
05/15/02	n/a	No, but I would like to say how helpful the PA's are when questions or problems arise.
05/16/02	KMC Telecom	As much as I have to work with everyone in Pooling Administration, there couldn't be a better - more patient group of people to work with! THANK YOU!
05/16/02	Sprint PCS	The Pooling Administrators are very positive and cooperative in attempting to solve problems! I love working with all of them! The majority of the time, things flow through the system promptly and efficiently.
05/16/02	Alltel	Being my first time pooling, I had several questions and concerns but the staff was very helpful and courteous each time I called.
05/16/02	Mpower	The Pooling Administrators have always been great, keep up the good work!
05/16/02	Sprint PCS	I have always enjoyed working with the PAs. I think they do a great job.
05/16/02	Telepacific You guys have been great.
05/16/02	CT Communications	I appreciate all the help that Gary Zahn and Dara Sodano have given me.
05/16/02	n/a	Dara Sodano and Kevin Gatchell have been extremely helpful, professional, PATIENT, and gracious. Applying for resources is very new to me and they have made the process less stressful!
05/16/02	Time Warner Telecom	Personally, I've worked with Gary Zahn and Kevin Gatchell a lot. They are always SO helpful and nice. They ALWAYS call me back with answers to my questions. They are two terrific guys who are a great asset to the number pooling organization!!!!
05/20/02	SBC - Pacific Bell	I just want to say THANK YOU to both Dara Sodano & Kevin Gatchell. Dara has been and still a GREAT help. Any Q's asked, she's always able to provide an answers right away. She's also great on replying back both on email and voice mail. Kevin Gatchell is the same way. Both Dara and Kevin are GREAT to work with. I enjoy working with them. Keep up the Great Work Guys!
08/13/02	Nextel Partners -- Jessica Wilson	All representatives I have had interactions with have been informative and helpful. Keep up the great work!
08/09/02	McLeod USA -- Cindy Nulty	The pooling department at NeuStar is always more than helpful.
08/09/02	First Cellular of Southern IL -- Jeanne Manis	I am very new to the pooling process so I have had to depend on the Pooling Administration staff completely. Everyone has been extremely helpful and courteous! Thanks for making it a positive learning experience!!!

Date received	Service provider	Comment
08/09/02	CTC Communications -- Bettie Kilcoyne	I have always found the Number Pooling Group to be professional and prompt in helping with any question (and we have had many) that we have. I am thoroughly impressed with the way the Pooling Administrators rallied when one of your best and brightest was so suddenly taken ill. I deal closely with Gary Zahn, and I realize that the group has worked very hard to pick up his areas without a noticeable difference to the SP's. They have done a fabulous job and I commend you all!
08/09/02	Pac-West Telecom -- Dennis Halm	I have been very pleased with all the support and assistance provided! Some procedures we have gone through recently were new territory for us. I.e., moving fully assigned blocks from one carrier to another via pooling per customer request is something we had never done before. The PA was extremely helpful in getting us through this procedure. Keep up the good work!
08/15/02	SBC/Pacific Bell -- Lourdes Panopio	Just want to say Thank You Very Much to Kevin Gatchell. He has been very supportive and very helpful. He response right away both phone and email. KEEP UP THE GOOD WORK. So far, all that I have talked to, like: Tara Farquhar, Dara Sodano and Dora Wirth, they have all been very helpful. They all have answered all my questions and explain them more where I can understand each meaning of the field. Again, KEVIN, TARA, DARA and DORA, THANK YOU VERY MUCH!!
08/09/02	Time Warner Telecom -- Teresa Newkirk	I am very pleased with the responses I have received from Tara, she is always prompt and very courteous.
08/09/02	Focal Communications -- Liz Gervase	What can we do to improve the quality of service we provide? Everything seems great to me. I work with Kevin Gatchell 99% of the time and all of my experiences with him have been great. He always goes above and beyond what I could ever expect. Often times when I request additional growth blocks in Rate centers, he will look to see if he can find me a new block in the same NXX that we currently have. Also, it is not uncommon for Kevin to turn my requests around within 1 day. It is just great service around and it is things like this that build relationships and make everything run smoothly!
10/22/02	Integra Telecom-- Julie L. Abernathy	I'm new to all numbering processes and I have received not only professional and prompt responses, but guidance as well.
10/21/02	Charter Fiberlink -- Bob Schwabe	Very satisfied with NeuStar Number Pooling
10/22/02	AT&T Wireless-- Susan Jansen	I will be able to comment more next time after 11/24 when I've had more experience using the PAS system and after Native Block Pooling is over. The Pooling Administrators have been very helpful during NBP.
10/22/02	Pac-West Telecomm, Inc -- Dennis Halm	Just keep up the good work. I have no complaints and have had no problems. The pooling administration has been great to work with.
10/22/02	ATX Communications and Corecomm -- David Frazee	The people are excellent.

Date received	Service provider	Comment
10/23/02	Sprint LTD -- Chris Schaffer	Once I connect with a Pooling Administrator, they have been very helpful, courteous and patient. Never had an unpleasant experience with anyone.
10/22/02	McLeod USA -- Cindy Nulty	Kevin Gatchell and his employees are awesome ... Great customer service skills.
10/22/02	T-Mobile USA, Inc. -- Natalie McNamer	We are participating in Native Block Pooling and both Tara Farquhar and Kevin Gatchell have been wonderful to work with. They are always very courteous and informative when I call with questions, which has been quite often. They have done a GREAT job!!!
10/22/02	SBC -- Julie Peterson	Florence Weber is great to work with!
10/22/02	Telepacific Communications -- Brandon Vaughn	Kevin Gatchell has been able to handle any and all problems that may have arose during my experience with the Number Pooling Administration. I would like to take this time to bring to your attention about the outstanding job that he does there.
10/30/02	BellSouth PCI -- Robert L Fulton	If you wish, but I will only have good things to say about the helpfulness of everyone with whom I have dealt. When I started Native Block Pooling, Gary was extremely helpful in assisting me to understand the system and the process. I am sure I have asked more than my share of stupid questions regarding the PAS system and the "real" 1000 Block Pooling, but Dara and Dora have been very patient and kind, and they always seem to have a "smile" in their voice. It is very refreshing to work with knowledgeable, professional, (and friendly) people. I can't leave out Julie. She, too, is wonderful to work with. Keep up the good work!!!
10/30/02	SBC/ Pacific Bell -- Lourdes Panopio	GREAT JOB & Thank You , KEVIN GATCHELL! Also, thank you to Tara Farquhar, Dara Sodano and Dora Wirth. They all have been a great help and still helping whenever I do have questions! THANK YOU!

9. Volume of reports produced

This section provides the total number of reports sent to the FCC and State Regulators (*Section 9.1*) and the total number of reports sent to NANC, NANPA, and service providers (*Section 9.2*).

9.1 Total number of reports produced for FCC and state regulatory agencies

Regulatory agency	Total number of reports
FCC	62
State regulators	180

9.2 Total number of reports produced for NANC, NANPA, and service providers

Group	Total number of reports
NANC	8
NANPA	4
Service providers	5

10. Additional informational offerings

While not specifically mandated by the Commission, NeuStar has included this additional section as further evidence of our continuing commitment to our role as National PA. Two subsections are included here. *Section 10.1* includes an analysis of the impact that thousands-block number pooling has had on the projections of NPA exhaust, as well as a summary of NXXs (by NPA) saved by pooling. *Section 10.2* describes efforts by the PA and the NANPA to cooperate on shared issues when necessary.

10.1 Impact of pooling on NPA exhaust and NXXs saved

10.1.1 Impact of pooling on NPA exhaust

The following table illustrates the positive impact number pooling has had on NPA exhaust.

- Only three (3) NPA pooling areas showed no change in NPA exhaust date according to the most recent NANPA NRUF projections.¹
- NPA relief plans in 22 NPA pooled areas were dismissed, rescinded, suspended or withdrawn during 2002.²
- Some significant highlights of the impact of number pooling include:

Maine 207 – began a pooling trial began in June 2000. The 1999 NRUF projected exhaust date was 2nd quarter 2002. This NPA is now not projected to exhaust until 4th quarter 2008.

Michigan 810 – the subject of disputes regarding NPA relief in the past has seen its projected exhaust date change since pooling has been implemented from 4th quarter 2000 in 1999 to the 1st quarter 2012.

North Carolina 919 – projected life has increased by 30 years, from 2nd quarter 2002 to 2nd quarter 2032.

Pennsylvania 412/724/878 – is now projected to exhaust in 3rd quarter 2026, an increase of 24 years.

Texas 210 – combined rate center consolidation with number pooling and the exhaust date has moved out 15 years from 4th quarter 2005 to 3rd quarter 2020.

New Jersey has seen significant increases in the projected lives of three (3) pooling areas:

- 201/551 – projected life increased by 17 years
- 732/848 – projected life increased by 16.5 years
- 862/973 – projected life increased by 13.25 years

Projected exhaust dates of all NPAs in pooling as of December 2002

ST	NPA	Projected exhaust date prior to pooling implementation	Current exhaust date	Increase in projected life in quarters
AL	205	3Q04	3Q07	12
AL	251	1Q11	4Q23	51
AZ	480	2Q08	4Q16	34
AZ	520	1Q02	2Q13	45

¹ DE 302, IN 765, MI 517

² AL 205, CA 408, 415, 510, 619, 650, 707, 714, 760, GA 404/678/770, FL 321/407, IN 317, MA 413, ME 207, NM 505, RI 401, TX 512, VA 757, WA 206, 360, 425, 509

ST	NPA	Projected exhaust date prior to pooling implementation	Current exhaust date	Increase in projected life in quarters
AZ	602	1Q06	4Q07	7
AZ	623	4Q20	2Q26	22
CA	209	2Q05	4Q12	30
CA	213	2Q07	3Q11	17
CA	310	3Q00	2Q03	11
CA	323	3Q03	2Q10	27
CA	408	2Q04	1Q08	15
CA	415	3Q03	1Q08	18
CA	510	3Q03	1Q09	26
CA	530	1Q05	2Q11	25
CA	559	1Q06	2Q13	29
CA	562	3Q06	1Q15	34
CA	619	1Q07	3Q13	26
CA	626	4Q05	2Q14	34
CA	650	2Q05	3Q11	25
CA	707	3Q08	1Q19	42
CA	714	3Q02	2Q06	15
CA	760	3Q04	2Q06	7
CA	805	4Q03	2Q09	22
CA	818	4Q03	2Q07	14
CA	831	4Q08	1Q15	25
CA	858	3Q09	2Q18	35
CA	909	4Q02	2Q03	2
CA	916	2Q05	1Q11	23
CA	925	4Q07	2Q13	22
CA	949	3Q06	3Q16	40
CO	303/720	3Q07	4Q07	1
CT	203	4Q01	3Q04	11
CT	860	2Q01	1Q04	11
DC	202	1Q06	1Q10	16
DE	302	3Q11	3Q11	0
FL	305/786	4Q06	4Q08	8
FL	321/407	1Q04	2Q07	13
FL	352	1Q08	4Q12	19
FL	386	4Q18	4Q20	8
FL	561	4Q02	1Q08	21
FL	727	2Q08	3Q15	29
FL	754/954	4Q02	1Q19	65
FL	772	~~~~	4Q26	NEW
FL	813	4Q06	3Q08	7
FL	904	1Q09	2Q11	9

ST	NPA	Projected exhaust date prior to pooling implementation	Current exhaust date	Increase in projected life in quarters
FL	941	3Q03	2Q11	31
GA	440/678/770	4Q01	2Q15	54
HI	808	3Q08	3Q13	20
IA	515	1Q15	1Q19	16
IA	641	2Q19	3Q19	1
IA	712	2Q15	3Q18	13
ID	208	3Q03	4Q09	25
IL	224/847	3Q00	3Q16	64
IL	312	4Q01	3Q05	15
IL	618	3Q02	2Q04	7
IL	630	1Q00	2Q03	13
IL	708	1Q01	4Q07	27
IL	773	2Q01	4Q05	18
IL	815	2Q02	2Q04	8
IN	219	2Q03	3Q12	37
IN	260	NEW	2Q19	NEW
IN	317	3Q02	4Q06	17
IN	574	~~~	2Q20	NEW
IN	765	3Q04	3Q04	0
KS	316	3Q12	2Q21	35
KS	913	2Q09	2Q17	32
LA	318	1Q08	4Q09	7
LA	504	4Q05	3Q13	31
LA	985	4Q08	2Q16	30
MA	339/781	2Q08	3Q13	21
MA	978	3Q07	2Q13	23
MA	413	1Q04	3Q09	22
MA	508/774	1Q07	2Q09	9
MA	617/857	3Q06	1Q16	38
MD	240/301	3Q03	4Q07	17
MD	410/443	3Q02	2Q04	7
ME	207	2Q02	4Q08	26
MI	248/947	1Q02	2Q25	93
MI	313	1Q06	2Q07	5
MI	517	4Q07	4Q07	0
MI	586	~~~	4Q16	NEW
MI	616	4Q02	2Q03	2
MI	734	3Q03	1Q08	18
MI	810	4Q01	1Q12	41
MN	507	1Q06	1Q10	16
MN	612	4Q08	1Q12	13

ST	NPA	Projected exhaust date prior to pooling implementation	Current exhaust date	Increase in projected life in quarters
MN	651	1Q12	3Q13	6
MO	314	1Q04	1Q08	16
MO	573	2Q08	1Q10	7
MO	636	1Q08	4Q17	39
MO	660	4Q21	3Q22	3
MO	816	1Q04	1Q08	16
NC	336	1Q03	2Q06	13
NC	704/980	1Q08	4Q17	39
NC	919	2Q02	2Q32	120
NE	402	3Q03	1Q05	6
NH	603	4Q01	3Q04	11
NJ	201/551	4Q01	4Q18	68
NJ	609	4Q02	3Q06	15
NJ	732/848	4Q00	2Q17	66
NJ	856	1Q04	2Q07	13
NJ	862/973	1Q01	2Q14	53
NJ	908	4Q02	4Q05	12
NM	505	4Q04	2Q07	10
NV	775	4Q06	1Q10	13
NY	212/646	2Q03	4Q09	26
NY	315	1Q02	4Q06	19
NY	347/718	3Q03	4Q10	29
NY	516	3Q01	1Q11	38
NY	518	1Q03	4Q08	23
NY	585	---	3Q15	NEW
NY	607	1Q05	3Q15	42
NY	631	3Q03	1Q07	14
NY	716	4Q01	2Q11	38
NY	845	2Q09	4Q14	22
NY	914	3Q01	3Q12	44
NY	917	1Q01	4Q02	7
OH	440	2Q04	2Q07	12
OH	740	4Q06	2Q06	-2
OH	937	2Q04	1Q06	7
OK	405	1Q04	1Q08	16
OK	918	1Q03	1Q05	8
OR	503/971	2Q08	1Q15	27
OR	541	3Q03	4Q05	9
PA	215/267	1Q03	1Q05	8
PA	412/724/878	4Q02	3Q26	95
PA	484/610	4Q01	1Q04	9

ST	NPA	Projected exhaust date prior to pooling implementation	Current exhaust date	Increase in projected life in quarters
PA	570	4Q03	3Q06	11
PA	717	2Q03	4Q06	14
PA	814	1Q05	1Q06	4
RI	401	1Q03	1Q09	24
TN	423	1Q07	3Q07	2
TN	615	1Q05	1Q07	8
TN	865	2Q14	3Q18	17
TN	901	3Q06	2Q10	15
TX	210	4Q05	3Q20	59
TX	214/469/972	4Q04	4Q07	12
TX	281/713/832	4Q02	1Q05	9
TX	409	1Q10	1Q18	32
TX	512	4Q03	3Q06	11
TX	682/817	3Q08	3Q14	24
TX	936	4Q13	4Q20	28
TX	940	1Q15	3Q17	10
UT	801	1Q02	2Q05	13
VA	276	~~~	1Q16	NEW
VA	434	~~~	1Q16	NEW
VA	540	3Q02	3Q06	16
VA	571/703	2Q07	3Q15	33
VA	757	1Q03	1Q07	16
VA	804	2Q02	2Q09	28
VT	802	4Q05	3Q07	7
WA	206	1Q06	1Q08	8
WA	360	1Q04	3Q04	2
WA	425	1Q06	3Q12	26
WA	509	2Q03	4Q06	14
WI	262	3Q04	3Q08	16
WV	304	2Q03	1Q04	3

10.1.2 NXXs saved by pooling

The following table illustrates that 3074 NXX codes have been saved in 42 states with number pooling in 187 NPAs in 156 pooled areas. NXX codes were saved in 119 or 76 percent of pooled NPA areas.

State	NPA	NXXs saved
AL	205	0
AL	251	0
AZ	480	2
AZ	520	0
AZ	602	1
CA	209	3
CA	213	1
CA	310	16
CA	323	12
CA	408	21
CA	415	16
CA	510	30
CA	530	0
CA	559	0
CA	562	5
CA	619	14
CA	626	5
CA	650	3
CA	707	10
CA	714	72
CA	760	17
CA	805	8
CA	818	47
CA	831	0
CA	858	5

State	NPA	NXXs saved
CA	909	112
CA	916	3
CA	925	12
CA	949	5
CO	303/720	15
CT	203	48
CT	860	37
DC	202	5
DE	302	0
FL	305/786	9
FL	321/407	3
FL	352	0
FL	386	9
FL	561	43
FL	727	0
FL	754/954	28
FL	772	6
FL	813	14
FL	904	19
FL	941	8
GA	404/678/770	6
HI	808	0
IA	515	0
IA	641	0
IA	712	0
ID	208	1
IL	224/847	235
IL	312	6

State	NPA	NXXs saved
IL	618	26
IL	630	80
IL	708	66
IL	773	35
IL	815	16
IN	219	10
IN	260	4
IN	317	4
IN	574	1
IN	765	0
KS	316	0
KS	913	0
LA	318	0
LA	504	1
LA	985	0
MA	339/781	47
MA	413	44
MA	508/774	135
MA	617/857	45
MA	978	39
MD	240/301	32
MD	410/443	44
ME	207	36
MI	248/947	2
MI	313	1
MI	517	1
MI	586	3
MI	616	9

State	NPA	NXXs saved
MI	734	5
MI	810	0
MN	507	1
MN	612	2
MN	651	0
MO	314	7
MO	573	7
MO	636	0
MO	660	0
MO	816	4
NC	336	3
NC	704/980	23
NC	919	9
NE	402	2
NH	603	199
NJ	201/551	73
NJ	609	0
NJ	732/848	99
NJ	856	3
NJ	862/973	107
NJ	908	4
NM	505	12
NV	775	0
NY	212/646	17
NY	315	24
NY	347/718	34
NY	516	56
NY	518	49

State	NPA	NXXs saved
NY	585	11
NY	607	8
NY	631	54
NY	716	78
NY	845	48
NY	914	33
NY	917	38
OH	440	19
OH	740	0
OH	937	1
OK	405	17
OK	918	1
OR	503/971	18
OR	541	28
PA	215/267	2
PA	412/724/878	48
PA	484/610	58
PA	570	5
PA	717	30
PA	814	0
RI	401	4
TN	423	0
TN	615	0
TN	865	0
TN	901	0
TX	210	3
TX	214/469/972	15
TX	281/713/832	17

State	NPA	NXXs saved
TX	409	0
TX	512	7
TX		0
TX	936	
TX	940	0
	801	47
VA	276	8
VA		22
VA	540	
VA	571/703	8
	757	14
VA	804	10
VT		6
WA	206	
WA	360	35
	425	5
WA	509	11
WI		0
Total 42	Total 187	

** Data from NXXs saved report on website

10.2 PA/NANPA cooperative efforts

Mass disconnects memo to states

On October 18, 2002, the directors of National PA and NANPA sent a memorandum to state regulatory agencies regarding the potential for multiple carriers to disconnect service without the necessary coordination. This would require NeuStar to immediately have to find other carriers who are willing to become the new LERG assignees for the affected Central Office (CO) codes assignees for and thousands blocks from these pools, and would have to reassign CO codes and blocks in an expedited manner. Depending on the number of codes or blocks involved, the potential exists for end-user customers to lose services while these activities are taking place. NeuStar, as both the NANPA and the National PA, strongly believes that any such possible large-scale reassignment of numbers must be directed and coordinated with regulatory authorities and service providers.

Response from the states to the memorandum was favorable and NeuStar developed a process where the state regulatory staff notifies the National PA Manager - Regulatory/Compliance if they are notified of a potential disconnect of codes and the PA will do the same for any affected states. So far we have received information from one state commission about the potential for mass disconnects.

PA/NANPA coordination

As necessary, the Pooling Administrators and NANPA coordinate code/block assignment issues such as determining whether a rate center is a pooling rate center or a carrier is a pooling carrier.

Weekly update calls

National PA Manager - Regulatory/Compliance meets weekly with the NANPA staff via conference calls to discuss NANPA/PA related pooling issues and shares meeting/schedule information (which lessens the conflict of overlapping meetings for the industry).