

National Thousands-Block Pooling Administration



2004 Annual Report



March 31, 2005

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

Mr. Oakey:

I am pleased to submit the National Thousands Block Pooling Administration 2004 Annual Report pursuant to CDRL 4.6.1. As directed by Section 2.18.1 of the Thousands-Block Pooling Contractor Technical Requirements, this report contains:

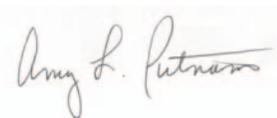
- The highlights and significant milestones we reached during the previous year
- An identification of existing and potential pooling areas
- An aggregated total by pool of service providers participating in the pooled area
- Forecast results, as well as a review of forecasts vs. actual block activation in the past year
- System and performance metrics
- The status of required transferable property
- Industry issue identification and feedback from service providers
- Volume of reports produced, aggregated by regulatory agency, NANC, NANPA, and service providers
- Additional informational offerings

2004 was an extraordinary year for NeuStar Thousands-Block Pooling Administration Services. We processed 69,193 applications, assigned 37,403 blocks, managed a total of 61,118 assigned blocks in the Pooling Administration System (PAS) (which equates to an increase of 111% since January 2003), audited the rate centers in PAS to assure the accuracy of their designations, submitted 12 change orders, participated cooperatively in the first performance evaluation by the Numbering Oversight Working Group (NOWG), successfully completed disaster recovery operational and technical testing of PAS, worked cooperatively with the FCC to carry out a transfer viability audit of the PAS, and implemented numerous improvements to the PAS.

As Director, I can assure you that we manage thousands-block number pooling services with accuracy and efficiency pursuant to our contract. We will continue to work cooperatively and effectively with customers, industry groups, and regulatory staff during the coming year.

On behalf of the entire team, I look forward to working with you throughout the remainder of this contract. Should you have any questions about this report, please do not hesitate to contact me.

Sincerely,



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1. History of NeuStar Pooling Administration from 1997-2003

History

In 1997, NeuStar, Inc. [then an autonomous business unit within Lockheed Martin Corporation known as Communications Industry Services (CIS)] was selected to administer the first trial of thousands-block number pooling in the United States in the Illinois 847 Numbering Plan Area (NPA). This trial, the first of its kind, was successfully implemented in June, 1998 and was backed by the Federal Communications Commission (FCC) in its *Memorandum Opinion and Order and Order on Reconsideration, CC 96-98, FCC 98-224*, known as “the Pennsylvania Order.” In the order, the FCC warned that number pooling was not a substitute for area code relief, but granted limited authority to continue the pooling trial. The order also encouraged other states to seek delegated authority to implement pooling trials. Shortly thereafter, NeuStar began administering the trial in New York’s 212 NPA.

On November 30, 1999 NeuStar, Inc. was divested from Lockheed Martin as a separate, privately-held company. And as more states requested and received delegated authority to implement thousands-block pooling trials, NeuStar was chosen as administrator in all but six states. By the end of 2000, NeuStar was managing 17 trials in seven (7) states.

On March 31, 2000, the FCC released the First Report and Order and Further Notice of Proposed Rulemaking (1st NRO Order) outlining the framework for a nationwide rollout of thousands block number pooling. NeuStar competitively bid and was awarded the federal contract on June 15, 2001, to administer the national rollout and ongoing pooling administration for a total of five years, renewable annually. NeuStar’s responsibilities as national Pooling Administrator are delineated in Section C: Thousands-Block Pooling Contractor Technical Requirements dated November 30, 2000, NeuStar’s response to the Request for Proposal (RFP), FCC rules, and industry guidelines.

Along with the fulfillment of contract obligations to develop an automated Pooling Administration System (PAS) and a national rollout schedule, NeuStar continued implementing pooling trials. In 2001, NeuStar implemented 54 more pooling trials and by October 15th, successfully transitioned to NeuStar the trials from six (6) states that had been initiated by another administrator.

In 2002, prior to the transition to the automated PAS on March 15th, NeuStar implemented the final 25 state pooling trials. In all, we transitioned 97 trials involving 114 NPAs from the state system to PAS.

NeuStar as National Pooling Administrator (PA)

Over the nine-month period following the contract award, NeuStar developed, tested and put the Pooling Administration System (PAS) into service according to FCC requirements. Rather than include them in the national rollout, NeuStar transitioned all state pooling trials to PAS at one time coincident with the turn-up of the PAS.

NeuStar Pooling Administration’s accomplishments during 2002 were the following:

- Conducted First Implementation Meetings (FIMs) in 75 NPAs in the time prescribed by the national rollout schedule established by the FCC. During the FIMs, pools were established and rate centers were designated as mandatory, optional or excluded according to FCC orders and industry agreement.
- Created a database of Metropolitan Statistical Areas (MSAs) to assist in the implementation process.
- Managed pools in 187 NPAs and 7233 rate centers.
- Developed and implemented “Native Block Pooling” in over 170 NPAs from January to June of 2002 to enable wireless carriers to get a head start on the pooling process in order to meet the FCC-mandated November 24th deadline.

- Transitioned wireless carriers to pooling by the November 24th FCC-mandated deadline.
- Assisted with development of procedures for and was named administrator for the modified Unassigned Number Porting (UNP) trial in Connecticut.
- Was awarded contract renewal from the FCC for year 2.

By the end of 2002, there were 10,023 total assigned thousands-blocks in PAS.

NeuStar PA's accomplishments during 2003 were the following:

- A successful reorganization that took effect on April 29th. As part of this reorganization, Amy Putnam was promoted to Director.
- Pooling Administrators assigned 19,004 thousands blocks, processed over 43,000 applications and opened 835 whole NXX codes for Location Routing Numbers (LRNs), dedicated customers and pool replenishment.
- Provided up-to-date Metropolitan Statistical Area (MSA) information to assist wireless industry with its implementation of number portability.
- Implemented the pooling "Tip of the Month" message.
- Conducted 36 FIMs in 49 NPAs according to the FCC national rollout schedule and successfully completed the rollout of national thousands block number pooling.
- Concluded the administration of the modified UNP trial in Connecticut.
- Implemented four FCC-approved change orders for PAS improvements.
- Was awarded contract renewal from the FCC for Year 3.

By the end of 2003, there were 29,027 total assigned thousands-blocks in PAS.

The NeuStar PA organization

Amy L. Putnam, Esq. is the Director of NeuStar PA. Amy reports to Joe Franlin, Senior Vice President for Customer Relations.

NeuStar PA consists of five functional areas:

1. The Pooling Administration Services Center (PASC) is responsible for performing the core functions of pooling administration: help desk, quality assurance, and industry interface. Regional Director, Florence Weber, manages the operation of the group.
2. Technical Operations is responsible for the day-to-day operation of the system and equipment. Wayne Louie manages the group.
3. Pooling Implementation Management is responsible for the implementation of the national pooling rollout schedule established by FCC orders and ongoing management of rate center files, as they are affected by FCC Orders, OMB Bulletins, state directives, and carrier requests. Mary Ensminger is the Regional Director for Implementation.
4. External Relations is responsible for addressing all activities relating to regulatory, compliance, media, and public relations issues. Shannon Sevigny is Regional Director for External Relations.
5. Data Analysis is responsible for the development and distribution of all periodic and ad hoc reports provided to the other functional areas, the FCC, state regulatory agencies, and service providers as well as the ongoing quality management of published and website reports. Bruce Armstrong is the Senior Data Analyst.

Individual NeuStar PA contact information can be found on the website, at <http://www.nationalpooling.com/contact/index.htm>.

2. 2004 NeuStar PA Highlights/Milestones

2004 Highlights/Milestones At-a-Glance

Following is a synopsis of the NeuStar national Pooling Administrator's (PA), major pooling accomplishments during the 2004 reporting period.

Thousands-block pooling. The PA processed 69,193 applications and assigned 37,403 blocks. The total number of assigned blocks in the Pooling Administration System (PAS) as of December 31st was 61,118. We opened 2,153 Central Office (CO) codes, more than two and a half times the number we opened in 2003.

Implementation. The PA, at the direction of the FCC, implemented changes created by the Office of Management and Budget's (OMB) Bulletins 03-04 and 04-03. These OMB Bulletins created 32 new Metropolitan Statistical Areas (MSAs) which resulted in an increase of 21% in the number of rate centers in which pooling is mandatory. The Pooling Implementation Managers (PIMs) conducted 14 Supplemental Implementation Meetings (SIMs) in 122 area codes (NPAs) in 38 states where the pooling status changed as a result of the OMB Bulletins. Pooling was implemented in all NPAs involved in the SIMs as of September 30th. NeuStar currently manages pools in 273 NPAs and 20,539 rate centers.

Pooling Administration System (PAS). In 2004, the PA implemented Phase Two of PAS modifications initiated by changes to industry guidelines from previously approved Change Orders (13, 18, 20, and 22). All approved Change Orders were implemented on time and within or under budget. We submitted a total of 12 change orders in 2004. The FCC acted on three (3), accepting two (2) and rejecting one (1). One of the approved change orders, number 29, involved changes to the PAS to auto-populate the Part 3 remarks field with comments from the donation form, and was implemented on August 30th.

In addition, we successfully conducted both operational and technical testing of the PAS pursuant to the Disaster Recovery Plan (DRP) during the week of August 28th (see Section 6).

Comprehensive and timely reporting. As PA, we produced 298 reports for the FCC, state regulatory agencies, North American Numbering Council (NANC), NANPA, and service providers during the reporting period (see Section 9). In addition, we produced a report for the FCC on carriers not participating in pooling in mandatory areas, as well as numerous internal reports.

Industry support. In 2004, the PA participated in three (3) North American Numbering Council (NANC) Issue Management Groups (IMGs), attended all Industry Numbering Committee (INC), Network Routing Resources Information Committee (NRRIC), and Common Interest Group on Routing and Rating (CIGRR) meetings, and submitted eight (8) issues and 10 contributions to INC.

We also implemented a "PAS Enhancements" link on our website which allows users to electronically submit suggestions for improvements to the PAS and publicized our formal process for problem resolution by placing it on the website.

Regulatory and Compliance. In 2004, the PA participated in its first annual performance review by the Numbering Oversight Working Group (NOWG), receiving a "more-than-met to exceeded" rating. We took part in four (4) state commission workshops, including providing reports; conducted two informational national conference calls for state commission staff to update them on pooling issues and procedures; held three (3) in-person pooling education meetings with state commissions; and conducted educational conference calls for four states (4) on block application and reclamation procedures.

The PA implemented the FCC "Red Light Rule" process.

Pooling Administration, Concord CA

Pooling Administration Productivity

In 2004, there were 69,193 applications processed by the PA (60,206 Approvals, 5,020 Denials, 3,967 Suspensions).

By December 31, 2004, there were 61,118 thousands blocks assigned in PAS, an increase of 32,091 (or 111%) since December 31, 2003.

More than 99.99% of applications were processed in less than 7 days during 2004. Only one application was not processed within 7 days during the entire year.

Table 1 - Applications Processed by the PA in 2004

Month	Total Applications Processed
January	4,574
February	5,548
March	4,858
April	5,160
May	4,625
June	5,742
July	5,498
August	6,007
September	6,587
October	7,808
November	6,439
December	6,347
Total	69,193

During the year, the volume of activity managed by the PA continued to grow steadily. The total number of thousands-blocks assigned during 2004 was 21,650,¹ which is nearly double the previous year's total of 21,050. Also, the number of applications processed per month increased by almost 60%. Following is a series of graphical representations of this growth.

Chart 1 illustrates the cumulative number of thousands-blocks assigned during 2004.

Chart 2 shows the actual increases in the monthly volume of assignments.

The total number of applications processed is a measure of the actual work performed by the pooling administrators, because not every application results in an immediate assignment of a thousands-block. Although a large majority of applications for numbering resources are processed and approved immediately, some are suspended for future action and some are denied entirely. Chart 3 provides a graphical illustration of all applications processed in the PAS for 2004.

¹ The difference between the number of blocks assigned in PAS for the year and block assignments can be accounted for by blocks that are assigned but later returned to the pool for some reason, and then reassigned in the same year.

Chart 1 - 2004 Cumulative Total Block Assignments

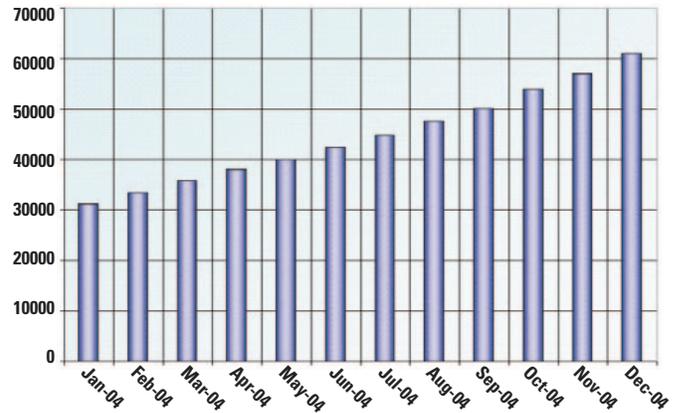


Chart 2 - 2004 Monthly Block Assignments

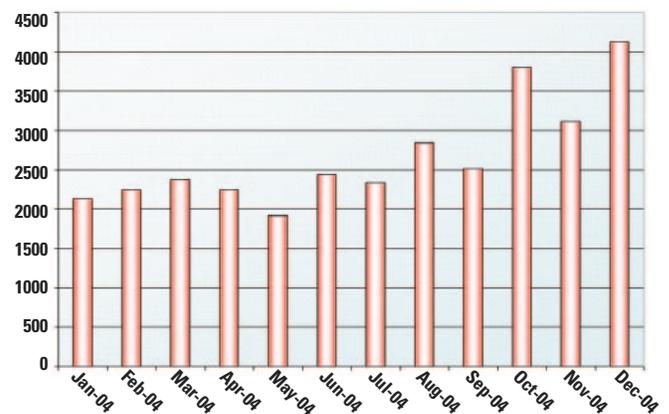
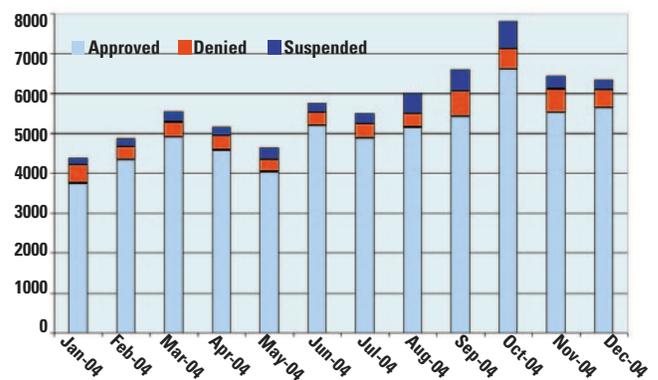


Chart 3 - 2004 Pooling Administration System Applications



Website

During 2004 and on our own initiative, the PA formalized two customer response processes and posted them to the website.

Escalation Process

The PA published on our website a formal supervisory escalation process to resolve issues involving Pooling Administration. This process is intended to solve problems for our customers before they become formal complaints.

If the normal supervisory escalation process does not result in agreement, the formal complaint process is available.

Improvement suggestions

The PA also developed an electronic method for use by customers to recommend that a feature be added to PAS to enhance its functionality. This “PAS Enhancements” process can be found on the website by going to the Tools link located on the top of the home page and selecting the PAS Enhancements link. Suggestions are automatically sent electronically to several members of the PA team. PA staff reviews each submission to determine whether more than one service provider or regulator could benefit from the suggested change. If not, PA staff works with the submitter in suggesting alternatives that may be currently available, such as a report.

Reclamation

Each thousands-block assignment has an associated “Part 3 effective date,” which is the date numbers in the thousands-block become available to be assigned to customers. The Thousands-Block Number (NXX-X) Pooling Administration Guidelines (TBPAG) direct that, “[a] thousands-block assigned to an SP should be placed into service by the applicable activation deadline, that is, six (6) months after the original effective date returned on the Part 3 and entered on the BCD/BCR screen in BIRRDs.” The block holder confirms that the thousands-block is in service by submitting a Part 4 to the PA. If the PA does not receive the Part 4 during the first five (5) months following the original effective date issued on the Part 3, we will send a reminder notice to the block holder.

If the Part 4 is not received within six (6) months of the original Part 3 effective date, the Part 4 is considered delinquent and the thousands-block may be reclaimed. By the 10th calendar day of each month, the PA sends a list of delinquent Part 4s for thousands blocks from the previous month to the appropriate state commission or FCC. The 1st NRO Order delegated authority to the state commissions to determine whether a thousands-block should be reclaimed or not. The FCC makes reclamation decisions for those states that have opted not to exercise their reclamation authority.

The PA website provides detailed information about the reclamation process, as well as contact information for the participating state commissions and the FCC.

In 2004, the state commissions or FCC authorized reclamation of 33 thousands-blocks.

PA Survey

Each year the PA conducts an annual performance survey. The survey functions as an issue identification method that then assists us with process enhancement and improved customer service. It is not a requirement of our FCC contract and is not connected with the NOWG annual performance evaluation survey.

In 2004, the PA placed the survey on the home page of the national pooling website. Survey participants had a choice of completing the survey online or returning the survey via email or fax. Giving participants the option of completing the survey online resulted in a higher response rate than had been previously experienced.

The 2004 survey was conducted in September and 114 surveys were returned. This was an 87% increase over the 61 surveys returned in 2003.

Prospective survey participants were asked to rate 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.

In the 2004 results, questions regarding performance of PA personnel showed a high level of satisfaction with scores of 4.4 or higher. Scores on the PAS remained at 4.1, with the exception of one 4.3. These scores are consistent with the 2003 scores. Satisfaction with overall performance scored slightly higher than in 2003, with a score of 4.5.

Table 2 - 2004 Annual Performance Survey Results

Surveys Returned = 114	Average score
The Pooling Administrators are knowledgeable about the thousands-block application processes.	4.5
The Pooling Administrators are courteous and helpful.	4.7
The Pooling Administrators respond to emails and phone calls within one business day.	4.4
I am satisfied with the level of service provided by the Pooling Administrators.	4.5
The Pooling Implementation Managers provide detailed information regarding pooling as it relates to the NPA at implementation meetings.	4.5
The Pooling Implementation Managers are responsive to inquiries.	4.5
The Pooling Implementation Managers demonstrate facilitation skills at implementation meetings.	4.5
I am satisfied with the level of service provided by the Pooling Implementation Managers	4.5
The Help Desk is courteous and helpful.	4.5

Table 2 (continued)

Surveys Returned = 114	Average score
The Help Desk responds to emails and phone calls within one business day and when needed, refers me to industry guidelines, websites or other appropriate resources.	4.5
I am satisfied with the level of service provided by the Help Desk.	4.4
The Pooling Administration System (PAS) allows me to easily fill out and submit applications, donations, forecasts and Part 4's.	4.1
PAS provides sufficient reporting capabilities to meet my needs.	4.1
The Pooling Administration System (PAS) is consistently available.	4.3
I am satisfied with the level of service provided by the Pooling Administration System (PAS)	4.1
The Pooling Administration Staff communicates information about pooling often enough to meet my needs.	4.5
The Pooling Administration Staff responds to my data request in a timely manner.	4.5
The Pooling Administration Staff responds to my inquiries in a timely manner.	4.5
I am satisfied with the level of service provided by the Pooling Administration staff.	4.5

Pooling Administration System (PAS)

Timeout Feature

Pursuant to the PA Security Plan, PAS login sessions that remained inactive for 15 minutes were terminated by the system. In response to numerous requests by PAS users to increase the time out feature, but recognizing a need to balance system security concerns, we extended the duration of the PAS time out feature to 20 minutes and updated the Security Plan to reflect the change.

Pooling Administration System (PAS) Improvements/Change Orders

Improvements to the PAS are driven by changes to FCC rules, industry guidelines, and specific service provider requests. If these suggested improvements or changes require a change to our contract or the PAS, change order proposals are submitted to the FCC. The NOWG currently reviews PA change order proposals and provides recommendations to the FCC on their disposition. To facilitate the review process, Shannon Sevigny serves as our liaison with the NOWG to address any issues that may arise, and to respond to their questions.

The PA submitted 12 Change Orders to the FCC in 2004, addressing a variety of system or process changes that are not addressed in our current contract with the FCC. These

change orders were driven either by industry changes to guidelines or specific service provider requests.

The FCC acted on three (3) change orders in 2004, accepting two (2) and rejecting one (1). Please see Table 3.

On September 2003, the FCC approved eight (8) change orders [10, 12, 13, 14, 18, 20, 21, and 22]. Implementation of these improvements was divided into two (2) delivery phases. Change Orders 12, 14, 18, and 21 were delivered in 2003, while the second phase, consisting of change orders 13, 18 (FTP portion), 20, and 22 were delivered February 23, 2004 as scheduled. The following describes the improvements made by each change order implemented in Phase Two (2):

- Change Order #13 LNPA Issue #356 Modification to the User Profile Application Appendix 5 form. The change added the Headquarters Address field to the service provider User Registration Form and User Profile. As a result, the Headquarters Address field on the Part 1A has been pre-populated with the address. If the user's current contact address was different than the headquarters address, the user had to update his or her profile.
- Change Order #18 Removal of the AOCN field from the Part 1A form (FTP Modification Only). This change was made to the AOCN field on the Part 1A for the File Transfer Protocol (FTP) process.
- Change Order #20 LNPA Issue #387 Changing Non-Pooled NXXs to Pooled NXXs. This change was made internally to support the method of changing a non-pooled NXX to a pooled NXX.
- Change Order #22 LNPA Issue #335 AOCNs Performing Initial Thousand Block Entries into BIRRDs and LNPA Issue #414 – Revisit Minimum Expedite Effective Date for a Thousands-Block. This change modified the default effective date in section 1.3 of the Part 1A from 26 calendar days to 31 calendar days for new, modify, disconnect, and block transfer requests.

On May 3, 2004, the FCC approved Change Order 26, which allowed the PA to obtain, for each of the seven (7) Number Portability Administration Center (NPAC) regions, a one-time report indicating whether an NPA-NXX is opened in the NPAC, and showing the contamination level of a donated thousands-block. Analysis of the NPAC report was intended to resolve the issue of service providers being unable to use the blocks that have been assigned to them, either because the NPA-NXX has not been activated in the NPAC, the block's

Table 3 - Change Orders Submitted to FCC in 2004

Change Order Number	Type	Description	NOWG Recommendation	FCC Status
26	NOWG Recommendation	NOWG Recommendation (regarding LNPA WG PIM 24 and CO/ NXX Issue #364)	N/A	Accepted
27	Forecast Report (Service Provider)	Extending the Forecast Report	Rejected	Pending
28	Issue 413 (LNPA)	Removal of Switch Information on Block Donation Form	N/A	Rejected
29	Issue 426 (LNPA)	Usage of Blocked Codes/Blocks Information from Appendix 2	Rejected	Accepted
30	Issue 423 (LNPA)	LERG Assignee Confirmation of Activation in PSTN for Industry Inventory Pool	Approved	Pending
31	Donation Report (Service Provider)	SP Enhancement - Expand Query Options for Donation Report	Approved	Pending
32	Work Items (Service Provider)	SP Enhancement -Modify Process for Deleting PAS Work Items	Approved	Pending
33	Search/View Form (Service Provider)	SP Enhancement - Modify Search Forms/View Form Query	Approved	Pending
34	Part 1A Report (Service Provider)	SP Enhancement - Modify Part 1A Report	Pending	Pending
35	Red Light Rule	Red Light Rule Interim Manual Process	Approved (w/modification)	Pending
36	Red Light Rule	Red Light Rule System Modification	Approved (w/modification)	Pending
37	Issue 458 (LNPA)	Reduce Aging Period for Returned/Reclaimed Blocks	Pending	Pending

contamination level is greater than 10%, or the block's code holder failed to complete its intra-service provider ports prior to donating the block(s). The PA implemented this change order and after thorough comparison of the NPAC and comparable PAS data, identification of anomalies, verification of which data point was accurate, and correction of the inaccurate data, provided the results to the FCC on July 2, 2004.

On July 19, 2004, the FCC approved Change Order 29, Usage of Blocked Codes/Blocks Information from Appendix 2. This change allowed comments from the donation form that a donated thousands-block has a special status [e.g. restricted use, chat line, etc.] to appear in the remarks section of the Part 3 when that thousands-block is assigned. The National PA implemented this change order in the PAS system on August 30, 2004.

Implementation

Supplemental Implementation Meetings (SIMs)

On June 6, 2003 the Office of Management and Budget (OMB) issued Bulletin 03-04 (Bulletin), which changed the definitions of Metropolitan Statistical Areas (MSAs), and altered the Census Bureau's population figures for many MSAs.² The FCC followed up on December 19, 2003, with a directive to the PA to revise rate center pooling characterizations to conform to the bulletin. The OMB then issued Bulletin 04-03 on February 18, 2004. The effect of these bulletins was to alter the status of many rate centers. Thirty-two (32) new MSAs were created by the OMB Bulletins. The FCC directed NeuStar PA

to follow the latest Census Bureau maps; therefore, it became incumbent upon the PA to review and modify the designations of rate centers associated with the revised MSAs.

There were extensive changes described in these directives:

- Prior to the OMB bulletin, there were 338 MSAs and after it was issued, there were 370 MSAs.
- There were 947 counties included in the old definitions and 1,187 in the new definition, an increase of 25%.
- Also, 501 counties were in the top 100 MSAs in the old definition and 637 in the new definition, an increase of 27%.

The effects of the changes were also extensive:

- There were 5,528 telephone rate centers in the old top 100 MSAs and 6,680 in the new definition, an increase of 21%.
- Approximately 500 rate centers actually fell out of the top 100 MSAs; however, carriers in them are still required to pool, according to FCC Orders mandating pooling to continue in the cumulative top-100 MSAs, starting with the 1990 census. .

² An MSA has at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration. MSAs include 83% of the U.S. population and are comprised of defined political subdivisions such as counties and equivalent entities (boroughs and census areas in Alaska, parishes in Louisiana, municipios in Puerto Rico, and independent cities in Maryland, Missouri, Nevada and Virginia, and have no relation to rate center boundaries.

- There were approximately 800 rate centers newly-identified as mandatory (including those originally considered optional or excluded).
- Additionally, approximately 430 rate centers were outside a top 100 MSA and part of a state pooling trial, but are now inside a top 100 MSA.

Even though First Implementation Meetings (FIMs) had been held for every NPA in the country, the Pooling Implementation Management (PIM) group pro-actively began planning for Supplemental Implementation Meetings (SIMs) in December 2003. The PA felt that the inclusion of rate centers that had not been mandatory at the time of the FIMs necessitated SIMs to educate additional carriers who may not have participated during the initial round of meetings. The PIMs verified the list of rate center-to-MSA associations that had been developed from MSA information gathered by our Senior Data Analyst, as well as the list of newly identified mandatory rate centers. The SIMs were held according to the FCC-approved schedule, from March 2, 2004 through April 1, 2004. There were seven (7) meetings in the eastern region states encompassing 48 NPAs, four (4) in the central region states covering 43 NPAs and three (3) in the western region states including 31 NPAs, for a total of 14 meetings in 38 jurisdictions and 122 NPAs. Each meeting was successful in that all of the participating service providers agreed on the list of rate centers and established the intervals associated with the mandated steps in the timeline. Pooling started in all NPAs impacted by the OMB directives by September 30, 2004.

Rate Center Files

One of the most important aspects of the national Pooling effort is the quality control and maintenance of the Rate Center Files. These files identify the areas in which service providers are required to participate in pooling, and they can be used as a reference to determine rate centers in which SPs can choose to participate in pooling. Each variation is described so that the service providers and the North American Numbering Plan Administrator (NANPA) have the latest information with regard to where service providers are required to pool. There are five different status designations of rate centers:

- Mandatory (M);
- Mandatory associated with a state trial (M);
- Mandatory with a Single Service Provider (M*);

- Optional (O); and
- Excluded (X).

The rate center files are used by service providers and regulators to ascertain rate center status, particularly where pooling is mandated. As discussed in Section 2, the Office of Management and Budget (OMB) issued directives in 2003 and 2004 and the FCC released four (4) NRO Orders that have affected and possibly changed the status designations that were initially applied to the rate centers. Therefore, in order to verify and maintain the accuracy of these files, the PIM team performed an extensive audit of rate centers to confirm that the ones populated in the PAS were available to the service providers as soon as they needed them, that pooling could be implemented on time according to milestones developed during the First and Supplemental Implementation meetings as well as throughout the year, and that the designation and MSA affiliation was accurate for each. As designations are updated or requested to be changed by individual service providers or regulators, the PIMs continually modify the database.

The FCC Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200 (3rd NRO) released December 28, 2001, stated that pooling would be mandatory in all rate centers in top 100 Metropolitan Statistical Areas (MSAs)³ and that pooling would be optional in non-top 100 MSAs. The designation of these rate centers as identified by the PIMs was confirmed at the First Implementation Meetings (FIMs) by the participating service providers and state regulatory staff. During the FIMs, the service providers could choose to participate in pooling in the non-top 100 MSA rate centers, or not. Those non-top-100 MSA rate centers in which at least one carrier chose to pool would then be designated as optional. Rate centers that were designated as mandatory as part of a state pooling trial were grandfathered into national pooling and their mandatory status was not altered by the NRO Orders.

The Fourth Report and Order in CC Docket No. 99-200 and CC Docket 95-116 and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (4th NRO) released June 18, 2003, established new Top 100 MSAs; and eliminated the use of Consolidated MSAs (CMSAs). It delegated to states the authority to direct pooling to continue in those rate centers associated with CMSAs

³ However, the list of MSAs that the FCC referenced in and attached to the Order was actually a list of the top-100 CMSAs.

where Pooling had already been implemented. The 4th NRO Order also declared that pooling is not mandatory in rate centers in which only one service provider is operating but would become mandatory when a second service provider enters the rate center. For the PA, this necessitated significant changes to the rate center database. Affected rate centers had to change from mandatory (M) in the CMSA environment to optional (O) in the 4th NRO's MSA environment, and that single service provider rate centers, which might previously have been designated as mandatory, would also have to have a change in their status. Thus, to assist NANPA in recognizing the unique quality of these rate centers, the PA designated these rate centers as M*.

The OMB directives (OMB 03-04 and OMB 04-03) also affected this growing list of rate center status designations by changing the MSA definitions. OMB 03-04 caused numerous rate centers to move into top 100 MSAs and become mandatory (M) or mandatory with a single service provider (M*); and some state trial mandatory (M) rate centers moved into top-100 MSAs, and became mandatory (M) under FCC national pooling rules. OMB 04-03 had no direct impacts on the rate centers in the top 100 MSAs, but did change the names of some of the top 100 MSAs; so updating the rate centers files became necessary, again, in order to accurately reflect the rate center-to-MSA correspondence of these new MSA names.

As a result of all the updates and changes caused by these orders and directives throughout 2004, the PIM team performed audits of all of the rate center files by cross-referencing rate center-specific data from all available sources and related databases in order to assure that the website accurately reflects the rate center names, designations and MSA affiliations. The PIM team members studied each of the rule changes outlined above and assessed the rate centers to make certain that each one is labeled with the right designation and MSA correspondence in the rate center files and that the correct rate centers are resident and available in the PAS to the service providers for submitting forecasts and making donations. The audit was completed as of December 15, 2004.

Throughout the year, as the PIMs modified rate center designations, because of regulatory directives or SP requests, these were populated onto a monthly report that was posted to www.nationalpooling.com for the immediate use of our customers and can be found under Reports as Rate Center File Changes.

Regulatory and Compliance

Training Updates (Regulatory)

In 2004, the PA took part in four (4) state commission workshops, to explain the PA contractual obligations and provide thousands-block pooling status reports. The workshops in West Virginia and Nebraska related to number conservation issues; the workshop in New Mexico related to developing an expedited safety valve process; and the workshop in New Hampshire related to internet access NXX (IANXX) procedures. In addition, the Manager of Regulatory/Compliance, Linda Hymans, conducted two (2) conference calls for state commission staff to update them on pooling issues and procedures, and held three (3) in-person pooling education meetings with three (3) state commissions, as well as educational conference calls for four (4) states on block application and reclamation procedures.

Debt Collection Improvement Act of 1996, FCC 04-72, MD Docket 02-339, Adopted March 25, 2004 (Red Light Rule)

The FCC's "Red Light Rule" provides that anyone filing an application or seeking a benefit from the FCC or one of its components (including the Universal Service Administrative Corporation, the Telecommunications Relay Service, the PA, or the North American Numbering Plan Administrator) who is delinquent in debts owed to the FCC will be barred from receiving a license or other benefit until the delinquency has been resolved. The FCC determined that numbering resources would be considered a "benefit" under the rule. As a result, the PA was directed to withhold assignment of numbering resources to an entity identified by the FCC as delinquent in its payments to them.

The PA Senior Data Analyst developed a manual process for the PA to use to determine, on a daily basis, whether any carrier's applications must be denied. That manual process would remain in place until such time as an automated process could be implemented. The PA submitted Change Orders 35 and 36 to address these processes.

Prior to the November 1st implementation of the Red Light Rule, PA staff made courtesy calls to those service providers that appeared on the FCC delinquent payment list in order to give them an opportunity to become current in their payments and avoid application denials.

FCC Symposium

On November 4th PA Director Amy Putnam participated in the FCC "Future of Numbering" symposium with NANPA Director John Manning to discuss the "State of the

NANP.” The purpose of the symposium was to explore the impact of new technologies, innovations, and services on the FCC’s numbering resource optimization goals, and to enable the FCC to receive input from interested parties and industry experts on the numbering resource optimization issues facing providers of new and emerging technologies and services.

Ms. Putnam presented a brief history and status of thousands block number pooling.

Non-Participation Service Provider Report

In the spring of 2003, the PA received a request from the FCC⁴ to furnish an intermittent report identifying for the FCC those service providers not submitting forecasts and/or donations, and directing that the state specific information be provided to the appropriate state Commissions. The first list was sent in May 2003. During 2004, we revamped the process for developing that list, and refined the criteria.

The four criteria we used for defining non-participation for the 2004 list were that, for a given rate center, a carrier had neither donated, received, nor marked as retained any blocks in that rate center, and that SP did not have a current forecast in PAS. If any one of the criteria was met, the carrier did not appear on the list.

During the early summer of 2004, members of the pooling team attempted to contact all service providers on this list to inform them of their status, and they were given ample time to correct the deficiency. The notification process prior to submission of the report to the FCC, and subsequent FCC action by the enforcement bureau, produced an increase in pooling participation, as noted by the subsequent increase in forecasts and donations.

The result of the notification process by the PA and the FCC on this project was particularly constructive. The notification process provided service providers an opportunity to correct any inadvertent omissions. As a result, pooling participation increased, and carriers were able to get themselves off the list before it was disseminated. Further contacts made by the FCC Enforcement Bureau to non-participating service

providers led to additional participation. A graphical example of the increased volume of donations in June and July is shown in Chart 4.

Additionally, a graphical example of the number of forecasts entered into the Pooling Administration System is shown in Chart 5. It should be noted that the large increase in volume of forecasts entered in July is likely related to both the non-participating service provider report and Numbering Resource Utilization/Forecasting Report (NRUF) compliance.

The process of identifying and notifying non-participating service providers began again in November, to be completed by the end of January 2005. As with the process concluded in mid-2004, the service provider notification process is producing an increase in submission of forecasts and the donation of additional blocks. The PA expects to complete a

Chart 4 - 2004 Pooling Block Donations

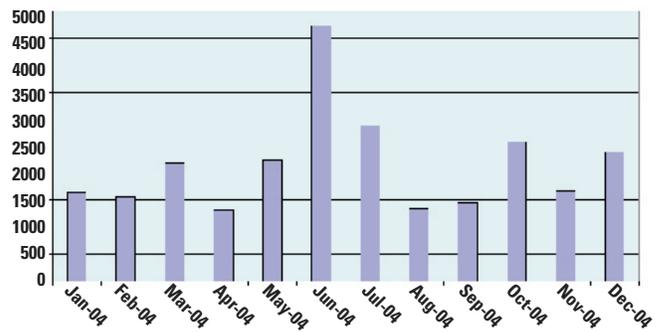
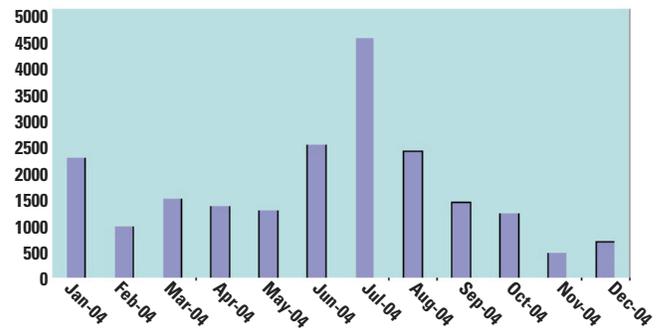


Chart 5 - 2004 Pooling Forecasts



Non-Participating Service Provider Report twice a year.

⁴ According to the Pooling Technical Requirements Section 2.8.1, when the PA encounters "...situations that alert it to possible carrier noncompliance with FCC rules and orders or the industry guidelines that it believes warrants the need for an audit," the PA shall "...document its observations and forward relevant information, which contains the details of the possible infraction, to the FCC or FCC-designated auditor for disposition."

3. Identification of Existing and Potential Pooling Areas

As of December 31, 2004, there were 20,539 existing total rate centers, of which 14,158 are in pooling and 6,381 are excluded from pooling. Of the total pooling rate centers, 8,288 are mandatory, either by state pooling trial order or by FCC directive because they are in a top-100 MSA. Of the total number of mandatory rate centers, 885 were single-service provider mandatory, meaning that pooling is optional there because there is only one service provider in each of those rate centers. At the point that another service provider receives resources there, the rate center status will be changed to mandatory and pooling will be required.

Table 4 shows a listing of the number of existing pooling areas (rate centers). Pursuant to the FCC-approved national rollout schedule we had held implementation meetings in all NPAs in the United States and Puerto Rico.¹ Pooling is implemented in all mandatory [top-100 MSA] areas. Therefore, we do not include a separate list of potential pooling areas, as there technically are none.

As of December 2004, all states had implemented thousands-block number pooling. Only five (5) states have no mandatory pooling areas: Alaska, Montana, North Dakota, South Dakota and Wyoming.

Identification of Existing Pooling Areas

Table 4 identifies, by state, the number of rate centers in the state, and how they were characterized as of December 31, 2004. Those rate centers are designated as:

1. **Mandatory (M)** - This rate center is located in a top 100 MSA and service providers with numbering resources in this rate center that have not been granted a specific exemption must pool in this rate center.
2. **Mandatory Single Service Provider (M*)** - This rate center is located in a top 100 MSA, but has only one service provider that is receiving numbering resources.

The rate center will be considered optional under these conditions and designated as M*. However, when a second service provider receives numbering resources in this rate center, the designation will be changed to M for Mandatory (see 1).

3. **Mandatory State Trial (M)** - Pooling was implemented in this rate center pursuant to a state commission order for a state pooling trial. The rate center is not in a top 100 MSA but has at least one LNP-capable service provider, and as a consequence, is considered a mandatory pooling rate center. Therefore, all service providers with numbering resources in this rate center that have not been granted a specific exemption must pool in this rate center.
4. **Optional (O)** - This rate center is not in a top 100 MSA and any service provider with numbering resources in this rate center may elect to pool in this rate center at its option. In other words, service providers may voluntarily participate in thousands-block number pooling in an Optional rate center outside the top 100 MSAs. Service providers that choose to pool may withdraw their participation in an Optional rate center only prior to the "PA Assessment of Industry Inventory Pool Surplus/Deficiency" date associated with that particular rate center, after which date, service providers may not opt out of pooling for that rate center. However, in any rate center that was Mandatory prior to the FCC's 4th NRO Order, but is now Optional, a carrier may opt out of pooling on a prospective basis and order resources from either the PA or NANPA, but no blocks previously donated will be returned.
5. **Excluded (X)** - This rate center is not in a top 100 MSA and no service provider is currently participating in pooling. Additionally, some rate centers may be in a top 100 MSA but the NPA association for a specific CO code is not geographically correct (e.g., mass calling or time/temperature CO codes). These rate centers are not included in PAS. Grandfathered codes may be included in PAS although the NPA association may not be geographically correct.

¹ We pro-actively held Supplemental Implementation meetings in NPAs affected by OMB 03-04, even though we had previously held FIMs in those NPAs, since additional rate centers became mandatory.

Table 4 - 2004 Rate Centers by State

State	Mandatory (M)	Mandatory Single Service Provider (M*)	Optional (O)	Mandatory State Trial (M)	Excluded (X)	Total
AK	--	--	2	--	283	285
AL	56	13	150	--	91	310
AR	30	17	119	--	216	382
AZ	19	28	30	--	56	133
CA	426	28	149	83	56	742
CO	30	7	90	10	90	227
CT	70	--	--	19	--	89
DC	1	--	--	--	--	1
DE	8	--	22	--	--	30
FL	145	3	87	25	49	309
GA	106	13	117	--	168	404
HI	1	--	5	--	--	6
IA	25	84	237	52	419	817
ID	13	18	103	--	132	266
IL	246	50	485	--	250	1031
IN	169	53	168	74	62	526
KS	40	46	136	--	352	574
KY	39	8	251	--	71	369
LA	55	13	135	--	82	285
MA	417	--	--	47	2	466
MD	210	--	--	106	--	316
ME	37	13	--	101	98	249
MI	210	24	313	--	108	655
MN	35	15	182	--	416	648
MO	129	29	128	103	340	729
MS	29	10	104	--	96	239
MT	--	--	76	--	184	260
NC	165	14	192	35	81	487
ND	--	--	67	--	233	300
NE	23	11	427	--	--	461
NH	31	--	3	92	22	148
NJ	287	1	21	--	--	309
NM	10	5	40	--	108	163
NV	16	8	36	--	33	93
NY	429	6	1	196	148	780
OH	377	126	407	--	156	1066
OK	96	45	118	16	255	530
OR	69	2	5	120	121	317
PA	656	34	111	117	171	1089
PR	98	4	72	--	--	174
RI	25	--	--	--	--	25
SC	76	32	87	--	46	241
SD	--	--	74	--	199	273
TN	99	10	141	--	91	341

Table 4 (continued)

State	Mandatory (M)	Mandatory Single Service Provider (M*)	Optional (O)	Mandatory State Trial (M)	Excluded (X)	Total
TX	493	66	537	7	568	1671
UT	12	--	--	10	--	22
VA	138	--	7	184	59	388
VT	--	--	--	101	40	141
WA	56	8	10	109	67	250
WI	90	38	220	--	254	602
WV	4	3	155	--	66	228
WY	--	--	50	--	42	92
Total	5796	885	5870	1607	6381	20539

4. Aggregated Total by Pool of the Service Providers Participating in the Pooled Area

Table 5 is a summary of the aggregated total by pool of the service providers participating in the pooled areas (rate centers) in 2004. There are 1,608 distinct service providers participating in 14,158 pooled areas in 273 NPAs covering 52 jurisdictions -- 50 states, the District of Columbia, and Puerto Rico.

Table 5 - 2004 Aggregated Total by Pool

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
AK	907	2	1
AL	205	61	29
AL	251	28	24
AL	256	64	28
AL	334	66	19
AR	479	27	11
AR	501	47	19
AR	870	92	17
AZ	480	1	22
AZ	520	27	23
AZ	602	1	24
AZ	623	1	20
AZ	928	47	21
CA	209	54	28
CA	213	3	31
CA	310	16	37
CA	323	12	34
CA	408	11	30
CA	415	14	33
CA	510	13	30
CA	530	89	31
CA	559	57	24
CA	562	9	32
CA	619	11	28
CA	626	10	33
CA	650	15	30
CA	661	32	32
CA	707	75	34
CA	714	13	36
CA	760	83	38
CA	805	40	35
CA	818	16	34

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
CA	831	24	24
CA	858	8	27
CA	909	21	29
CA	916	16	31
CA	925	17	26
CA	949	7	31
CA	951	20	30
CO	303	16	25
CO	719	32	18
CO	720	16	21
CO	970	73	18
CT	203	32	32
CT	860	57	27
DC	202	1	28
DE	302	30	23
FL	239	14	24
FL	305	5	32
FL	321	22	30
FL	352	43	23
FL	386	21	28
FL	407	17	36
FL	561	7	33
FL	727	5	32
FL	754	5	3
FL	772	8	26
FL	786	4	28
FL	813	8	34
FL	850	44	24
FL	863	21	24
FL	904	20	31
FL	941	11	34
FL	954	5	36

Table 5 (continued)

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
GA	229	30	15
GA	404	1	29
GA	470	1	0
GA	478	21	15
GA	678	42	49
GA	706	72	39
GA	770	42	29
GA	912	27	18
HI	808	6	11
IA	319	53	15
IA	515	56	21
IA	563	51	13
IA	641	123	20
IA	712	115	22
ID	208	79	31
ID	435	55	21
IL	217	187	24
IL	224	42	20
IL	309	83	21
IL	312	1	32
IL	618	193	34
IL	630	26	31
IL	708	32	30
IL	773	10	35
IL	815	165	37
IL	847	42	34
IN	219	44	28
IN	260	73	22
IN	317	36	30
IN	574	45	25
IN	765	121	35
IN	812	145	34
KS	316	14	20
KS	620	103	20
KS	785	76	22
KS	913	29	26
KY	270	123	21
KY	502	35	26
KY	606	98	16
KY	859	42	31
LA	225	34	23
LA	318	73	17
LA	337	42	18

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
LA	504	8	25
LA	985	46	27
MA	339	40	11
MA	351	57	0
MA	413	60	30
MA	508	85	33
MA	617	20	33
MA	774	85	31
MA	781	40	31
MA	857	20	18
MA	978	57	36
MD	240	57	42
MD	301	57	32
MD	410	101	35
MD	443	101	38
ME	207	151	25
MI	231	76	18
MI	248	20	30
MI	269	76	30
MI	313	6	27
MI	517	62	30
MI	586	11	26
MI	616	36	32
MI	734	33	32
MI	810	47	30
MI	906	50	7
MI	947	20	0
MI	989	110	24
MN	218	53	17
MN	320	57	21
MN	507	86	26
MN	612	1	24
MN	651	14	30
MN	763	11	28
MN	952	10	30
MO	314	7	25
MO	417	91	19
MO	573	126	25
MO	636	46	26
MO	660	57	16
MO	816	62	30
MS	228	11	15
MS	601	35	28

Table 5 (continued)

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
MS	662	97	27
MT	406	76	16
NC	252	63	22
NC	336	71	38
NC	704	52	39
NC	828	68	23
NC	910	64	27
NC	919	36	34
NC	980	52	9
ND	701	67	21
NE	308	178	14
NE	402	283	23
NH	603	126	32
NJ	201	22	37
NJ	551	22	3
NJ	609	39	30
NJ	732	36	32
NJ	848	36	7
NJ	856	32	29
NJ	862	42	14
NJ	908	38	34
NJ	973	42	35
NM	505	55	24
NV	702	15	24
NV	775	45	24
NY	212	3	24
NY	315	114	33
NY	347	13	31
NY	516	12	35
NY	518	108	27
NY	585	76	24
NY	607	44	22
NY	631	54	33
NY	646	3	34
NY	716	60	27
NY	718	13	32
NY	845	91	38
NY	914	28	35
NY	917	13	17
OH	216	4	21
OH	234	103	7
OH	330	103	29
OH	419	163	29

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
OH	440	62	32
OH	513	25	30
OH	567	163	12
OH	614	16	28
OH	740	159	36
OH	937	112	29
OK	405	79	30
OK	580	85	23
OK	918	111	25
OR	503	54	26
OR	541	88	34
OR	971	54	21
PA	215	36	26
PA	267	36	36
PA	412	23	26
PA	484	85	41
PA	570	121	30
PA	610	85	38
PA	717	90	31
PA	724	150	35
PA	814	119	25
PA	878	173	0
PR	787	87	7
PR	939	87	1
RI	401	25	23
SC	803	68	38
SC	843	69	28
SC	864	58	30
SD	605	74	11
TN	423	58	33
TN	615	49	33
TN	731	45	15
TN	865	30	20
TN	901	14	23
TN	931	54	26
TX	210	1	25
TX	214	43	33
TX	254	57	22
TX	281	45	30
TX	325	51	22
TX	361	57	22
TX	409	38	26
TX	430	124	2

Table 5 (continued)

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
TX	432	19	16
TX	469	43	28
TX	512	33	35
TX	682	24	14
TX	713	45	23
TX	806	55	17
TX	817	24	32
TX	830	74	24
TX	832	45	28
TX	903	124	30
TX	915	6	18
TX	936	38	20
TX	940	42	34
TX	956	28	22
TX	972	43	36
TX	979	44	23
UT	801	22	24
VA	276	67	25
VA	434	47	22

State	NPA	Number of Rate Centers	Number of Service Providers/NPA
VA	540	88	29
VA	571	19	21
VA	703	19	35
VA	757	34	27
VA	804	55	29
VT	802	101	18
WA	206	5	29
WA	253	14	28
WA	360	65	43
WA	425	14	29
WA	509	85	37
WI	262	58	27
WI	414	4	21
WI	608	83	28
WI	715	120	26
WI	920	83	28
WV	304	162	26
WY	307	50	10
Totals		14158	1608*

*Total quantity of distinct SPs participating in pooling.

Table 6 is a summary of the aggregated total by pool of the service providers participating in the pooled areas since 2002.

Table 6 - Aggregated Total by Pool Since 2002

Year	Total Number of Distinct Service Providers	Pooled Areas	Total Number of NPAs
2002	1,159	4,838	187
2003	1,631	13,322	271
2004	1,608	14,158	273

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 as compared to actual block activation (assignment) in the past year can be found on the attached CD. This report is provided electronically only due to its size (920 pages). In summary, there are:

- 272 NPAs;
- 9,406 rate centers;
- 174,322 forecasted blocks; and
- 37,150 activated (assigned) blocks.

Based upon this information, we have determined that 21.3% of forecasted blocks were assigned. To arrive at these results, we measured the actual forecasts submitted by service providers (SPs) throughout the calendar year

and compared these forecasted blocks against the quantity of blocks that were assigned to those same SPs within the same calendar year.

We also did a summary of the number of thousands blocks that were activated in the past several years, but because service providers have up to six months after assignment to activate a block, activations cannot reasonably be compared against forecasts in a given year. The quantities of activated blocks for each year are shown in Table 7.

Table 7 is a comparison of the forecasted versus actual block assignment since national thousands-block pooling began in 2002. Thousands-block forecasts were most accurate in 2003 and least accurate when national pooling began in 2002.

Table 7 - Forecasted Versus Actual Block Assignment Since 2002

Year	Number of Forecasted NPAs	Number of Rate Centers	Number of Forecasted Blocks	Number of Assigned Blocks	Percent of Actual Assigned Blocks	Total Activated Blocks
2002	199	4,760	81,398	6,740	8.3	6,234
2003	271	7,823	70,101	21,533	30.7	17,954
2004	272	9,406	174,322	37,150	21.3	25,564

6. System and Performance Metrics

Performance

Section 3.3.1 of Section J: Thousands-Block Pooling Contractor Technical Requirements, states that the pooling system shall, at a minimum, adhere to the following availability and reliability requirements:

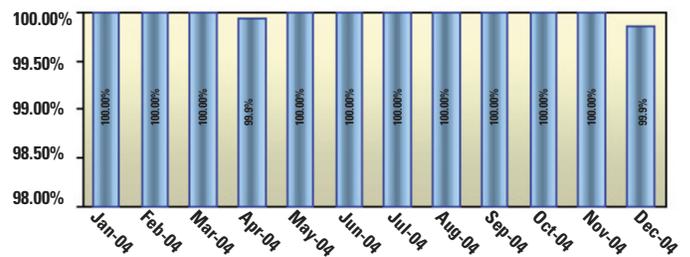
1. Available 24 hours a day, 7 days a week.
2. Availability shall meet or exceed 99.9% of scheduled uptime.
3. Unscheduled maintenance downtime per any 12-month interval shall be less than nine (9) hours.
4. The mean time to repair (MTTR) for all unscheduled downtime per any 12-month interval shall be less than one hour during core business hours and four (4) hours for non-core business hours.
5. Scheduled maintenance downtime per 12-month interval shall be less than 24 hours.

NeuStar PA met or exceeded all of the requirements above during 2004. Of the total of 8,784 hours in 2004, PAS was available for 8,783, for an average availability of more than 99.9 percent. No trouble tickets were submitted during the outages indicating that no customers were affected by these negligible outages.

Table 8 - 2004 PAS System Performance

Month	Time Available	Percent Time Available
January	744	100
February	696	100
March	744	100
April	719 hours, 32 minutes	99.9
May	744	100
June	720	100
July	744	100
August	744	100
September	720	100
October	744	100
November	720	100
December	743 hours, 28 minutes	99.9

Chart 6 - 2004 Total PAS Availability



Disaster Recovery Operational and Technical Testing

The PA successfully completed operational and technical disaster recovery testing during the week of August 23rd. Operational testing, which took place in the Concord office, included review and revision of the NeuStar and building evacuation plans, as well as an evacuation drill.

The PAS components, including the web server, application server, load balancer/ftp server, and the database server including the actual oracle database were tested on August 28th. Testing involved taking apart the PAS and then rebuilding it from scratch as if it had been destroyed in a disaster. The pooling technical staff simulated the complete destruction of the PAS by removing the data on the hard drives, then rebuilding the entire operating system and database from scratch, and restoring all current PAS data from backup files. We had requested a maintenance downtime window from the FCC as a precaution, and during the allotted maintenance time, we successfully completed all the tests in our test plan with no downtime.

7. Status of Required Transferable Property

NeuStar Pooling Administration Services affirms that all required transferable property is available for transfer. The complete transferable property inventory report is provided to the FCC under separate cover.

8. Industry Issue Identification/Feedback

Suggested PAS Improvements

As result of suggestions we received from the industry we submitted five (5) change orders in 2004:

- CO 27 – Extending the Forecast Report from 12 to 18 Months,
- CO 31 – Expanding Query Options for the Donation Report,
- CO 32 – Modify the Process for Deleting PAS work items,
- CO 33 – Modify Search Forms/View Query,
- CO 34 – Modify Part 1A Report

Further details about these Change Orders can be found in Section 2.

Also, as described in Section 2, the PA developed an electronic method for customers to recommend changes to the PAS that will enhance their use of it. At the request of the NOWG, change orders resulting from service provider suggestions will now be submitted quarterly rather than as they come in.

Customer Support Representative (Help Desk)

The Customer Support Representative (CSR or Help Desk) is the human interface between the PAS and our customers. The CSR responds to both internal and external requests for technical support and attempts to promptly confirm the cause of the problem. The CSR:

- Opens, logs, and monitors trouble tickets to ensure that problems are resolved in a timely manner, and is able to quickly identify the appropriate person to whom to escalate issues, as needed;
- Works with carriers to troubleshoot problems over the phone and at the desktop, to assist in resolving technical problems;

- Answers a variety of inquiries from customers, including questions regarding use of forms and the PAS, and assists users with locating documentation; and
- Creates, deletes and maintains user accounts and passwords.

In 2004, the Customer Support Representative received approximately 4,700 calls from our customers. Forty-one (41) trouble tickets were submitted to the Help Desk on items such as suggested changes to PAS, pooling process-related questions, and PAS errors.

North American Numbering Council (NANC) Issues

NeuStar, as national PA, participated in all six (6) bi-monthly meetings of the North American Numbering Council (NANC) in 2004, reporting on the status of thousands block pooling administration and events affecting the performance of the PA. In 2004, the PA reported on changes to rate center designations resulting from OMB Bulletins 03-04 and 04-03 (see Section 2), change orders (see Section 2), the PA survey (see Section 2), status of complaints (see Section 8), and the Non-Participating Service Provider Report (see Section 2). We received one on-going action item from the NANC in 2004 to provide updates on the Non-Participating Service Provider Report that we continue to do at each meeting.

NANC Issue Management Group (IMG) Participation

The PA participated in the following NANC Issue Management Groups (IMGs) in 2004 as a neutral third party providing information and data but taking no position on the outcome of the IMGs:

California 25% Contamination - As reported in the 2003 PA Annual report, the National PA participated in the NANC IMG in 2003 and accepted donations up to and including 25% contamination in the California 310 and 909 NPAs. The National PA participated in this IMG in the

1st quarter of 2004 until the IMG produced the report to the NANC in March 2004.

Dedicated Codes - This IMG was initiated by an action item from the NANC to review the customer impact, procedure and other implications of INC’s Issue 407 (Treatment of Dedicated Codes for Single Customers in a Pooling Environment). This issue would permit service providers to go directly to the NANPA when ordering whole NXX codes for a dedicated customer in a pooling environment. Current FCC rules prohibit this procedure. The IMG will make a recommendation to the NANC.

The PA participated in this IMG providing input as needed, answering questions on the current process and providing feedback on the accuracy of the number of forms required for the current process.

Safety Valve Requests - In December 2004, the NANC created this IMG to address an issue raised at the November meeting. The IMG is examining alternatives to expedite the processing of safety valve requests that have been filed with state commissions. The PA is participating as neutral third party on this IMG for clarification on current process and to provide data as needed.

Future of Numbering - This working group was formed in December 2004 at the direction of the NANC. The mission of this IMG is to investigate new telephone numbering assignment approaches and future telephone number assignment requirements. The working group will identify common criteria and gather data to identify trends and their impact upon numbering resources. If necessary, it will analyze such trends and requirements to determine the feasibility and benefit of each, and will report its findings to the NANC. The working group will also analyze various issues and assignments that may be given to it from time to time by the NANC and/or the FCC.

The PA is participating in the IMG providing input as needed on various topics. Since the group was initially focused on the Navy request for its own NXX, the PA has not had to provide much data at this time.

Industry Numbering Committee (INC) Issues

Industry Interface Representative, Dara Sodano, represented the PA at the following industry forums in 2004: Industry Numbering Committee (INC), Common Interest Group on Rating and Routing (CIGRR), Network Routing Resources Information Committee (NRRIC) and the National Number Portability Operations (NNPO). Shannon Sevigny represented us at the Local Number

Portability Working Group (LNPA WG). As the national PA, our participation at these industry forums included:

- Working on issues that affected pooling administration such as answering questions relating to thousands-block pooling process;
- Actively participating in the discussions; and
- Developing and submitting new issues based on input we receive from the industry, regulators, and internal sources.

In 2004, the PA worked with the NRRIC on Issue 0253, Substantive Updates to Network Interconnection Interoperability Forum (NIIF) 0015, Intercompany Responsibilities Within the Telecommunications Industry document and submitted eight (8) new issues and 10 new contributions to INC.

Table 9 depicts a list of new issues and contributions submitted to INC by the PA in 2004:

Table 9 - 2004 PA INC Issues & Contributions

INC Meeting	Issue/Contribution Number	Issue/Contribution Title
INC 74	Issue: 430	Modify PA General Administration Duties
INC 74	Contribution: DMM-132	PA TBPAG General Administration Duties (Corresponding INC Issue: 430)
INC 74	Contribution: LNPA-473	Remove NPAC Release 2.0 References from Part 1B Form (Corresponding INC Issue: 427)
INC 74	Contribution: DMM-131	Updates to TBPAG with Release of FCC’s Fourth NRO Order (Corresponding INC Issue: 418)
INC 74	Rejected	Modifications to Growth Thousands-Block Request Criteria (handled as an action item)
INC 75	Issue: 435	Documenting SP Need for an Additional LRN
INC 75	Contribution: LNPA-479	Text Changes in the TBPAG Documenting SP Need for an Additional LRN (Corresponding INC Issue: 435)
INC 76	Issue: 445	NANC 323 Impacts to INC Guidelines
INC 76	Contribution: DMM-139	Addressing the Administrative Procedures of PA Change Orders (Corresponding INC Issue: 437)
INC 77	Issue: 446	Add remarks Field to Part 1A
INC 77	Contribution: LNPA-485	Modification to Part 1A (Corresponding INC Issue: 446)

Table 9 (continued)

INC Meeting	Issue/Contribution Number	Issue/Contribution Title
INC 77	Issue: 447	Clarification to Transfers of Thousand-Blocks Within Non-Pooled NXXs
INC 77	Contribution: LNPA-486	Text Changes to Section 8.4.2 of the TBPA (Corresponding INC Issue: 447)
INC 78	Issue: 450	Clarification for MTE Calculations When Requesting Additional Blocks for Growth
INC 78	Contribution: LNPA-487	Text Changes to Section 8.3.4 of the TBPA (Corresponding INC Issue: 450)
INC 78	Issue: 451	Reserving NXX Codes in Pooling Areas (Joint issue submitted by NANPA & PA)
INC 78	Contribution: CO/NXX-307	Text Changes to Section 7.4.4 of the TBPA Addressing Reserving NXX Codes in Pooling Areas (Corresponding INC Issue: 451)
INC 79	Contribution: DMM-149	Text Changes to INC Procedural Agreements Reached (PAR) Working Document (Corresponding INC Issue: 437)

Aggregate of Issues from PA Survey

Several issues were consistently brought to our attention in the annual PA survey responses (also see Section 2). These issues were reviewed and evaluated by PA staff. We responded to all of these issues as appropriate. For instance, even though the PA had sent out a Tip of the Month in June regarding an issue with pop-up blockers, we resent the same Tip again in December because of issues raised in the September survey.

Table 10 - Aggregate of Issues From PA Survey

Issue	Status
Extend timeout feature in PAS.	The window of inactivity allowed prior to being timed out by PAS has been extended from 15 to 20 minutes, in an effort to balance security issues with carriers' requests.
Would like the ability to order multiple blocks on the same request with different effective dates.	A Change Order was submitted to allow for multiple blocks with different effective dates to be submitted on one request.
PAS is not giving users a warning before timing them out of the system.	Caused by an issue with Pop-Up Blockers. A "PA Tip of the Month" was sent in June, and for a second time in December providing a solution for this issue.
The "new password" process is cumbersome.	A Change Order was submitted to allow the user to reset their password in PAS.

Table 10 (continued)

Issue	Status
Donation Status is not clearly communicated by PAS for rejected donations.	A Change Order was submitted to add the disposition of the donation to the body of the e-mail sent by PAS.
No warning when a user's access to PAS will become inactive.	A Change Order was submitted to have PAS send an email notification 10 days prior to the user id becoming inactive and again 3 days prior to the user id being de-activated.
PAS should have the ability to send a Part 3 to our AOCN.	A Change Order was submitted to add a maximum of 3 "Additional Contacts" to a user's profile. This would allow for Part 3s, Part 4 reminders, Forecast reminders, Completed Part 1Bs and Rejected Part 1Bs to be sent to someone other than the user.
Assigned/Available block reports by rate center would be helpful.	A Change Order was submitted to add the ability for a user to query the block reports by State, and/or NPA, and/or Rate Center.
Part 3 should reference what was requested.	Additional details have been added to the remarks section of the Part 3 responses.

Working With the Numbering Oversight Working Group (NOWG)

The PA interfaces with the Numbering Oversight Working Group (NOWG) in several ways: participating in the annual performance review process, providing explanation or clarification as the NOWG reviews PA change orders, and responding to pooling-related questions as they arise. Shannon Sevigny acts as liaison between the PA and the NOWG.

In 2004, the PA participated in the first annual performance review by the NOWG. The NOWG reviewed the PA for calendar year 2003.

The NOWG annual review of the PA performance included the following:

- Drafting annual PA performance assessment survey questions with input from the PA;
- Presenting the final draft of the annual survey to the NANC/FCC;
- Posting the survey to the PA website and notifying State Commissions and telecommunication industry participants;
- Meeting with the PA to perform an Operational Review;
- Presenting a draft report to the FCC and the PA; and
- Presenting the final report to the NANC for approval and forwarding to the FCC.

Management staff participated in an operational review on April 12-14. The PA received a “More than Met to Exceeded” rating from the NOWG. This performance assessment was based on results from the performance ratings compiled from the NOWG survey, observations during the NOWG review of the PA, and written comments.

In the course of the 2003 PA annual review, the NOWG made six (6) suggestions for the continuous improvement of pooling administration that the PA should consider. Although the FCC did not direct the PA to implement the recommended plan made by the NOWG, the PA proactively implemented some of those recommendations.

Table 11 shows improvements made by the PA in 2004 in response to the NOWG suggestions.

Table 11 - PA Improvements Completed in 2004

NOWG Suggestion	PA Improvement
Distribution of the Annual Report.	The PA will be making the 2004 and ongoing annual reports public.
PA staff training to increase knowledge of industry guidelines.	Each month the Industry Interface Representative, Dara Sodano, reviews a section of the guidelines with the PA staff as a refresher course. The guidelines are also reviewed again during staff meetings.
Change the PAS timeout function to longer than 15 minutes.	The PAS timeout function has been changed from 15 minutes to 20 minutes.
Conduct a continual review of the information on the home page to ensure that the information is kept current and up to date.	A review and redesign of the pooling website was completed by PA staff and is expected to be released in January 2005. The Regulatory/ Compliance Manager, Linda Hymans, reviews the website on a monthly basis to ensure that the information is kept current.

The NOWG also provides recommendations to the FCC on PA change orders. The NOWG made 11 recommendations on PA change orders to the FCC in 2004. The NOWG recommended approval of five (5), approval of two (2) with modifications, and denial of four (4). In addition, the NOWG made a verbal suggestion to the PA that service provider enhancements to PAS should be submitted to the FCC on a quarterly basis rather than as they come in individually. The PA will implement that suggestion and will offer its first service provider enhancement combined change order to the FCC in the first quarter of 2005.

In November 2004, the PA provided input and made recommendations on the NOWG survey for PA performance in 2004 that the NOWG will send out in early 2005.

Complaints

Pursuant to Section 2.7.4 of the Thousands Block Pooling Contractor Technical Requirements, if a performance problem is identified by a telecommunications industry participant, the PA must notify the FCC of the problem within one business day. The PA must then 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 recommended to be taken.

In 2004, NeuStar, as national PA, responded to two formal industry complaints that were sent to the FCC:

1. On March 3rd, the PA received an email regarding an alleged missed deadline for block assignment. The PA responded to the FCC and the complainant on the results of the investigation on March 17th. No further action was taken.
2. On April 13th, a letter dated April 6 was received about a reclamation issue. The PA responded to the FCC and the complainant about the results of the investigation on April 20th. On May 14th, the PA received a rebuttal by the complainant. After discussion by phone with the complainant on May 26th, the PA sent a written response to the rebuttal on June 2nd. No further action was taken.

Tip of the Month

The PA, on its own initiative, created the Tip of the Month (Tip) in July 2003 and feedback from recipients continues to be positive. The Tip is sent via email to the PAS distribution list on the first business day of each month. Topics for the Tip are generated from issues raised and suggestions received from regulators and service providers, INC action items and internally, when processes need to be clarified. The Tip of the Month provides helpful information regarding the PAS and thousands-block pooling process, as well as serving as a useful reference for all PAS users. Archive files for Tips from previous years can be found on our website at <http://www.nationalpooling.com/tools/archives/tips-archive/index.htm>.

Table 12 - 2004 Tips of the Month

Month	Topic
January	Outlines the “Code Holder Responsibilities” per section 4.1 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines.

Table 12 (continued)

Month	Topic
February	Outlines the “Expedite Process for a Thousands-Block Allocation” per section 8.6 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines.
March	As a result of INC Issue 426, INC requested the PA to send the following notice: “It is recommended that the SP review the available blocks list on the PA website and compare it with the Telcordia™ LERG® Routing Guide NPA-NXX “A” record for service compatibility in its respective networks.”
April	Describes how individuals can address their concerns by following our problem resolution process, which provides a timely method to resolve problems or concerns involving Pooling Administration.
May	Describes the process on disabling PAS accounts when employees are no longer with the company or a user of PAS.
June	Describes a potential issue that PAS Users may experience as a result of a “Pop-Up Blocker” software installed on their internet browser.
July	Describes carriers’ obligations to submit their forecasts for all rate areas where thousands-block pooling has been implemented in which they are, or should be, a thousands-block number pooling carrier.
August	Reminds service providers that they have the option of using the LNP CO Code Re-Allocation Process or the SPID Migration Process (NANC 323) when updating the NPAC as a result of taking over the LERG assignee responsibilities for an NXX.
September	Outlines the “Thousands-Block Donations” process per section 7.27.7 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines.
October	Describes when PAS User ID passwords will expire, how to obtain a new PAS password and how to reactive a disabled PAS account.
November	Outlines the “Standard Effective Dates for a Thousands-Block Allocation” per section 8.2.4 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines.
December	Describes a potential issue that PAS Users may experience as a result of a “Pop-Up Blocker” software installed on their internet browser.

9. Volume of Reports Produced Aggregated by Regulatory Agency, NANC, NANPA and Service Providers

This section provides the total number of reports sent to the FCC and State Regulators and the total number of reports sent to NANC, NANPA and service providers.

Table 13 - Reports for FCC and State Regulatory Agencies

Regulatory agency	Total number of reports
FCC	60
State regulators	163

Table 14 - Reports for NANC, NANPA, and Service Providers

Group	Total number of reports
NANC	6
NANPA	23
Service providers	46

10. Additional Informational Offerings

NeuStar, as national PA, provides the following information of interest regarding the impact of thousands-block number pooling and trends in pooling since NeuStar began pooling administration in 1998.

NXXs saved by pooling

Table 17 illustrates the 15,163 NXX codes that have been saved in 50 states and the District of Columbia and Puerto Rico with number pooling in 273 NPAs. NXX codes were saved in all but one pooled NPA area – Alaska 907 – which added pooling in one rate center in June 2004.

NPA Exhaust in Pooled Areas

Table 18 examines the changes in NPA exhaust in NPAs with thousands-block number pooling. Based on an analysis of the NANPA 2004 NRUF and NPA Exhaust Analysis dated October 31, 2004, of the 273 NPAs in pooling today, 41 saw no change, exhaust dates moved up, or were too new to analyze. Only 11 NPAs, or four (4) percent, continue to show an accelerated exhaust date since pooling began.

Some state regulatory commissions are facing the projected need for code relief, and have been investigating ways to hold off the introduction of a new NPA. As seen in Section 3, of the 20,539 rate centers, more than half are designated as Optional (O) or Excluded (X): 5,870 are designated as O and 6,381 are X.

Building on the national experience with the beneficial impact of thousands-block number pooling on NPA exhaust, staff from the Nebraska Public Service Commission requested in April 2004, that the PA change the designation for all excluded rate centers in Nebraska to optional. This would make those rate centers available in PAS for pooling whenever a service provider decided to pool there. While this did not change any pooling requirements for service providers, it made all rate centers available for pooling without a special request to the PA at such time as a service provider became pooling-capable.

On the October 14, 2004 the Oklahoma Corporation Commission (OCC) filed a petition with the FCC in CC Docket 99-200 for authority to implement numbering optimization measures to extend the life of the 580 NPA.¹ The OCC requested in its petition that the FCC expand the scope of its delegated authority to include implementation of thousands-block number pooling in the 580 NPA in local number portability (LNP) capable rate centers located outside a top-100 metropolitan statistical area, where two or more carriers have numbering resources. Comments on the OCC petition were due by November 29, 2004.

Following the OCC petition, the Nebraska and West Virginia Public Service Commissions each filed petitions for authority to implement additional number resource optimization measures. On November 1, 2004, the Public Service Commission of West Virginia filed a petition for an expedited decision for delegated authority to implement mandatory thousands-block number pooling in the 304 NPA in LNP-capable rate centers, located outside a top 100 MSA, where two or more carriers have numbering resources.

On November 23, 2004, the Nebraska Public Service Commission filed a similar petition for the 402 area code. The Nebraska Public Service Commission explained that the 402 area code includes one of the top 100 MSAs and also includes areas where the majority of access lines are LNP-capable. Comments on those petitions were due by December 30, 2004.

Trends in Thousands Block Number Pooling

When NeuStar started administering pooling trials in 1998, nearly every NPA was experiencing acceleration in exhaust dates. On September 30, 1999, there were 73 NPAs

¹ In the Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200 and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (2nd NRO Order), the Commission explained that the national uniform framework for thousands-block number pooling supersedes state authority. On April 24, 2002, the FCC adopted a national thousands-block number pooling rollout schedule, for the top 100 MSAs. The Bureau stated that it would consider extending pooling to NPAs outside of the top 100 MSAs once pooling was implemented in the top 100 MSAs.

in jeopardy. Today there are 30 in a jeopardy status, which is a 59 percent reduction, and only two of those have been declared in jeopardy since October 2000. Today there are only four (4) NPAs expected to exhaust within 12 months.

An example of how pooling has contributed to NPA conservation is the delay in exhaust of the Illinois 847 NPA. In June 1998, when NeuStar implemented this first trial of thousands-block number pooling, the 847 NPA was expected to exhaust within three months. NANPA declared the exhaust of the 847 NPA three (3) years later on August 31, 2001.

While these developments are not solely attributable to thousands-block number pooling, the PA estimates that over 15,000 NXX codes have been saved by pooling, which is the equivalent of 18.75 NPAs. (See Table 17)

Since we began the national rollout of thousands block number pooling in March 2002, participation in pooling has dramatically increased. This increase can be attributed to the completion of the national rollout, the addition of wireless to pooling in November, 2002, modifications to the rate center designations as a result of OMB changes to the MSA lists and regulatory enforcement.

Pooling Growth Chart – 2002-2004

Table 15 contains pooling statistics since 2002 and illustrates percent change in activity between 2002 and 2004.

Table 15 - Pooling Growth Chart

2002 statistics	2003 statistics	2004 statistics	Percent Increase since 2002
206 CO codes opened for LRNs	475 CO codes opened for LRNs	787 CO codes opened for LRNs	282%
37 CO codes opened for dedicated customers	98 CO codes opened for dedicated customers	258 CO codes opened for dedicated customers	597%
194 CO codes opened for pool replenishment	240 CO codes opened for pool replenishment	933 CO codes opened for pool replenishment	380%
8,102 blocks assigned during 2002	21,650 blocks assigned during 2003	37,403 blocks assigned during 2004	361%
11,741 rate centers in pooling	13,351 rate centers in pooling	14,158 rate centers in pooling	21%
10,023 total assigned blocks as of 1/1/03	29,027 total assigned blocks as of 1/1/04	61,118 total assigned blocks as of 1/1/05	510%
15,097 applications processed in 2002	43,473 applications processed in 2003	69,193 applications processed in 2004	358%

Total Applications Processed Since 2002

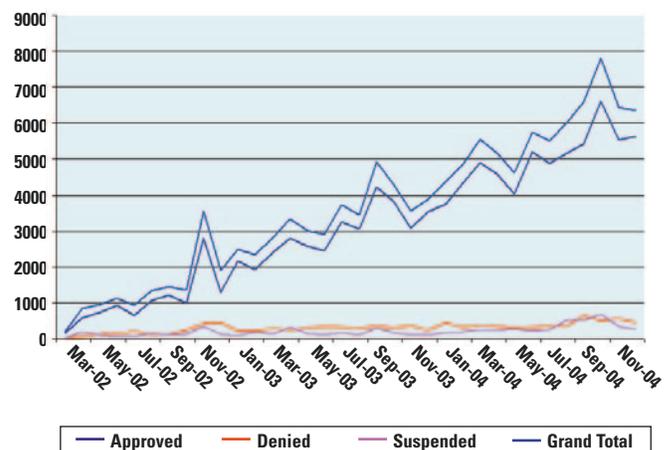
The total number of applications processed is a measure of the actual work performed by the pooling administrators, because not every application results in an immediate assignment of a thousands-block. Although a large majority of applications for numbering resources are processed and approved immediately, some are suspended for future action and some are denied entirely.

Table 16 and Chart 7 contains the total numbers of applications processed since national pooling began in March 2002. The percentage of change for January through March represents the change between 2003 and 2004 only. April through December shows the percent change since 2002. Overall, since 2002, the number of applications processed has increased 358%.

Table 16 - Total Applications Processed Since 2002

Month	2002	2003	2004	Percent increase
January	N/A	2,678	4,574	70%
February	N/A	2,553	5,548	117%
March	N/A	3,225	4,858	51%
April	646	3,636	5,160	698%
May	910	3,289	4,625	408%
June	1,277	3,078	5,742	350%
July	1,252	4,072	5,498	339%
August	1,630	3,689	6,007	269%
September	1,623	5,144	6,587	306%
October	1,734	4,444	7,808	350%
November	3,897	3,680	6,439	65%
December	2,128	3,985	6,347	198%
Total	15,097	43,473	69,193	358%

Chart 7 - Total Applications Processed Since 2002



Cumulative Thousands Blocks Assigned Since 1998

Chart 8 illustrates the cumulative numbers of total blocks assigned since pooling began in Illinois in June 1998.

Chart 8 - Cumulative Thousands Blocks Assigned Since 1998

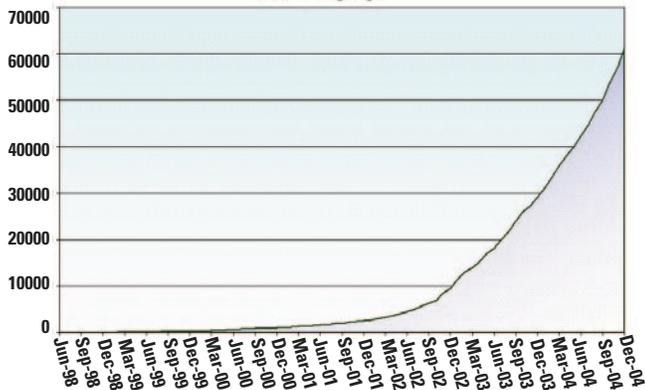


Table 17 - NXXs Saved by Pooling

State	NPA	Quantity of NXXs saved by pooling
New Jersey	201/551	163
District of Columbia	202	9
Connecticut	203	140
Alabama	205	35
Washington	206	13
Maine	207	129
Idaho	208	46
California	209	86
Texas	210	7
New York	212/917/646	48
California	213	16
Texas	214/972/469	83
Pennsylvania	215/267	128
Ohio	216	9
Illinois	217	71
Minnesota	218	9
Indiana	219	70
Louisiana	225	18
Mississippi	228	7
Georgia	229	23
Michigan	231	56
Florida	239	47
Michigan	248/947	78
Alabama	251	19
North Carolina	252	35
Washington	253	30

Table 17 (continued)

State	NPA	Quantity of NXXs saved by pooling
Texas	254	6
Alabama	256	31
Indiana	260	38
Wisconsin	262	43
Michigan	269	125
Kentucky	270	29
Virginia	276	38
Maryland	301/240	229
Delaware	302	39
Colorado	303/720	44
West Virginia	304	129
Florida	305/786	47
Wyoming	307	4
Nebraska	308	7
Illinois	309	46
California	310	164
Illinois	312	11
Michigan	313	32
Missouri	314	32
New York	315	129
Kansas	316	10
Indiana	317	78
Louisiana	318	16
Iowa	319	12
Minnesota	320	13
Florida	321/407	79
California	323	50
Texas	325	7
Ohio	330/234	87
Alabama	334	25
North Carolina	336	67
Louisiana	337	23
Massachusetts	339/781	172
Florida	352	64
Washington	360	125
Texas	361	20
Florida	386	59
Rhode Island	401	92
Nebraska	402	17
Georgia	404	10
Oklahoma	405	76
Montana	406	9
California	408	55
Texas	409	16

Table 17 (continued)

State	NPA	Quantity of NXXs saved by pooling
Maryland	410/443	440
Pennsylvania	412/724/878	212
Massachusetts	413	130
Wisconsin	414	13
California	415	54
Missouri	417	18
Ohio	419/567	59
Tennessee	423	36
Washington	425	34
Texas	432	10
Virginia	434	38
Utah	435	17
Ohio	440	80
Georgia	478	10
Arkansas	479	6
Arizona	480	6
Arkansas	501	9
Kentucky	502	17
Oregon	503/971	65
Louisiana	504	11
New Mexico	505	71
Minnesota	507	41
Massachusetts	508/774	401
Washington	509	77
California	510	64
Texas	512	46
Ohio	513	27
Iowa	515	7
New York	516	112
Michigan	517	45
New York	518	129
Arizona	520	20
California	530	45
Virginia	540	86
Oregon	541	105
California	559	43
Florida	561	79
California	562	36
Iowa	563	5
Pennsylvania	570	75
Missouri	573	170
Indiana	574	31
Oklahoma	580	21
New York	585	92

State	NPA	Quantity of NXXs saved by pooling
Michigan	586	41
Mississippi	601	10
Arizona	602	6
New Hampshire	603	404
South Dakota	605	3
Kentucky	606	18
New York	607	39
Wisconsin	608	37
New Jersey	609	162
Pennsylvania	610/484	290
Minnesota	612	10
Ohio	614	61
Tennessee	615	41
Michigan	616	118
Massachusetts	617/857	135
Illinois	618	258
California	619	42
Kansas	620	2
Arizona	623	5
California	626	39
Illinois	630	194
New York	631	216
Missouri	636	49
Iowa	641	13
California	650	38
Minnesota	651	20
Missouri	660	16
California	661	22
Mississippi	662	14
Georgia	678/770/470	95
North Dakota	701	3
Nevada	702	11
Virginia	703/571	87
North Carolina	704/980	156
Georgia	706	35
California	707	65
Illinois	708	224
Iowa	712	6
Texas	713/281/832	111
California	714	117
Wisconsin	715	10
New York	716	113
Pennsylvania	717	80
New York	718/917/347	160

Table 17 (continued)

State	NPA	Quantity of NXXs saved by pooling
Colorado	719	10
Florida	727	35
Tennessee	731	4
New Jersey	732/848	231
Michigan	734	82
Ohio	740	78
Florida	754/954	61
Virginia	757	59
California	760	105
Minnesota	763	11
Indiana	765	34
Florida	772	62
Illinois	773	100
Nevada	775	11
Kansas	785	6
Puerto Rico	787/939	13
Utah	801	98
Vermont	802	69
South Carolina	803	43
Virginia	804	57
California	805	104
Texas	806	9
Hawaii	808	10
Michigan	810	49
Indiana	812	24
Florida	813	55
Pennsylvania	814	36
Illinois	815	175
Missouri	816	38
Texas	817/682	56
California	818	99
North Carolina	828	14
Texas	830	14
California	831	19
South Carolina	843	49
New York	845	192
Illinois	847/224	420
Florida	850	26
New Jersey	856	116
California	858	40
Kentucky	859	10
Connecticut	860	126
New Jersey	862/973	243
Florida	863	26

State	NPA	Quantity of NXXs saved by pooling
South Carolina	864	64
Tennessee	865	30
Arkansas	870	20
Tennessee	901	10
Texas	903/430	28
Florida	904	59
Michigan	906	7
Alaska	907	0
New Jersey	908	80
California	909	138
North Carolina	910	36
Georgia	912	18
Kansas	913	15
New York	914	116
Texas	915	7
California	916	45
Oklahoma	918	48
North Carolina	919	98
Wisconsin	920	31
California	925	58
Arizona	928	19
Tennessee	931	26
Texas	936	14
Ohio	937	71
Texas	940	13
Florida	941	65
California	949	35
California	951	90
Minnesota	952	14
Texas	956	17
Colorado	970	46
Massachusetts	978/351	210
Texas	979	15
Louisiana	985	28
Michigan	989	24
Total NXXs Saved		15163

Number of NPA's saved by Pooling = 19

Table 18 - NPA Exhaust in Pooled Areas

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
New Jersey	201/551	4Q01	4Q31	120
District of Columbia	202	1Q06	4Q24	75
Connecticut	203	4Q01	4Q06	20
Alabama	205	3Q04	2Q10	23
Washington	206	1Q06	4Q23	71
Maine	207	2Q02	1Q12	39
Idaho	208	3Q03	4Q09	25
California	209	2Q05	3Q16	45
Texas	210	4Q05	4Q25	80
New York	212/917/646	2Q03	2Q11	32
California	213	2Q07	3Q22	61
Texas	214/972/469	4Q04	4Q13	36
Pennsylvania	215/267	1Q03	4Q11	35
Ohio	216	1Q11	4Q15	19
Illinois	217	2Q04	4Q08	18
Minnesota	218	4Q09	2Q14	18
Indiana	219	2Q03	2Q19	64
Louisiana	225	2Q13	4Q23	42
Mississippi	228	3Q26	3Q26	0
Georgia	229	2Q24	3Q18	-23
Michigan	231	2Q08	1Q12	15
Florida	239	NEW	4Q17	N/A
Michigan	248/947	1Q02	3Q33	126
Alabama	251	1Q11	4Q23	51
North Carolina	252	1Q10	4Q12	11
Washington	253	3Q14	1Q20	22
Texas	254	1Q14	4Q21	31
Alabama	256	3Q08	3Q08	0
Indiana	260	~~~	2Q19	N/A
Wisconsin	262	3Q04	3Q15	44
Michigan	269	NEW	2Q21	N/A
Kentucky	270	4Q04	2Q08	14
Virginia	276	~~~	2Q27	N/A
Maryland	301/240	3Q03	4Q11	33
Delaware	302	3Q11	2Q18	27
Colorado	303/720	3Q07	2Q19	47
West Virginia	304	2Q03	4Q06	14
Florida	305/786	4Q06	2Q16	38
Wyoming	307	1Q21	1Q21	0
Nebraska	308	2Q26	1Q23	-13
Illinois	309	1Q11	1Q11	0

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
California	310	3Q00	4Q05	21
Illinois	312	4Q01	4Q09	32
Michigan	313	1Q06	2Q16	41
Missouri	314	1Q04	1Q12	32
New York	315	1Q02	3Q10	34
Kansas	316	3Q12	1Q25	50
Indiana	317	3Q02	4Q10	33
Louisiana	318	1Q08	3Q08	2
Iowa	319	3Q30	3Q30	0
Minnesota	320	3Q18	3Q16	-8
Florida	321/407	1Q04	1Q10	24
California	323	3Q03	2Q10	27
Texas	325	2Q25	2Q25	0
Ohio	330/234	3Q12	3Q26	56
Alabama	334	3Q05	3Q10	20
North Carolina	336	1Q03	2Q10	29
Louisiana	337	3Q10	1Q11	2
Massachusetts	339/781	2Q08	4Q18	42
Florida	352	1Q08	4Q15	31
Washington	360	1Q04	3Q07	14
Texas	361	3Q13	3Q09	-16
Florida	386	4Q18	1Q25	25
Rhode Island	401	1Q03	3Q13	42
Nebraska	402	3Q03	2Q06	11
Georgia	404	4Q01	1Q11	37
Oklahoma	405	1Q04	4Q13	39
Montana	406	1Q08	1Q10	8
California	408	2Q04	4Q08	18
Texas	409	1Q10	4Q13	15
Maryland	410/443	3Q02	3Q08	24
Pennsylvania	412/724/878	4Q02	2Q23	82
Massachusetts	413	1Q04	3Q15	46
Wisconsin	414	3Q15	3Q17	8
California	415	3Q03	4Q08	21
Missouri	417	1Q09	3Q08	-2
Ohio	419/567	3Q02	4Q17	61
Tennessee	423	1Q07	1Q14	28
Washington	425	1Q06	1Q29	92
Texas	432	3Q19	2Q23	15
Virginia	434	~~~	2Q23	N/A
Utah	435	3Q18	3Q18	0
Ohio	440	2Q04	2Q11	28

Table 18 (continued)

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
Georgia	478	2Q22	2Q22	0
Arkansas	479	4Q23	4Q23	0
Arizona	480	2Q08	4Q18	42
Arkansas	501	1Q02	2Q15	53
Kentucky	502	2Q06	4Q11	22
Oregon	503/971	2Q08	4Q26	74
Louisiana	504	4Q05	4Q19	56
New Mexico	505	4Q04	4Q08	16
Minnesota	507	1Q06	3Q09	14
Massachusetts	508/774	1Q07	4Q10	15
Washington	509	2Q03	1Q11	31
California	510	3Q03	1Q10	26
Texas	512	4Q03	4Q10	28
Ohio	513	3Q08	2Q12	15
Iowa	515	1Q15	3Q21	26
New York	516	3Q01	1Q11	38
Michigan	517	4Q07	2A12	18
New York	518	1Q03	4Q10	31
Arizona	520	1Q02	3Q17	62
California	530	1Q05	2Q12	29
Virginia	540	3Q02	2Q11	35
Oregon	541	3Q03	1Q10	26
California	559	1Q06	2Q14	33
Florida	561	4Q02	2Q15	50
California	562	3Q06	2Q16	39
Iowa	563	4Q31	4Q31	0
Pennsylvania	570	4Q03	3Q09	23
Missouri	573	6Q08	2Q08	-4
Indiana	574	~~~	2Q20	N/A
Oklahoma	580	2Q07	2Q06	-4
New York	585	~~~	4Q14	N/A
Michigan	586	~~~	4Q19	N/A
Mississippi	601	3Q04	3Q05	4
Arizona	602	1Q06	4Q13	31
New Hampshire	603	4Q01	3Q07	23
South Dakota	605	2Q12	4Q11	-2
Kentucky	606	2Q06	3Q11	21
New York	607	1Q05	3Q15	42
Wisconsin	608	4Q12	2Q11	-6
New Jersey	609	4Q02	1Q09	25
Pennsylvania	610/484	4Q01	2Q09	30
Minnesota	612	4Q08	4Q21	52

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
Ohio	614	1Q05	1Q10	20
Tennessee	615	1Q05	1Q11	24
Michigan	616	4Q02	4Q17	60
Massachusetts	617/857	3Q06	3Q21	60
Illinois	618	3Q02	2Q08	23
California	619	1Q07	1Q14	28
Kansas	620	3Q09	3Q11	8
Arizona	623	4Q20	3Q27	27
California	626	4Q05	2Q15	38
Illinois	630	1Q00	1Q06	24
New York	631	3Q03	2Q09	23
Missouri	636	1Q08	2Q23	61
Iowa	641	2Q19	4Q21	10
California	650	2Q05	4Q12	30
Minnesota	651	1Q12	4Q18	27
Missouri	660	4Q21	3Q16	-21
California	661	1Q06	1Q11	20
Mississippi	662	4Q05	4Q07	8
Georgia	678/770/470	4Q01	3Q18	67
North Dakota	701	4Q10	4Q10	0
Nevada	702	2Q06	3Q16	41
Virginia	703/571	2Q07	1Q18	43
North Carolina	704/980	1Q08	4Q30	91
Georgia	706	1Q03	4Q05	11
California	707	3Q08	3Q10	8
Illinois	708	1Q01	4Q09	35
Iowa	712	2Q15	4Q20	22
Texas	713/281/832	4Q02	4Q11	36
California	714	3Q02	3Q07	20
Wisconsin	715	4Q06	2Q07	2
New York	716	4Q01	4Q11	40
Pennsylvania	717	2Q03	3Q09	25
New York	718/917/347	3Q03	2Q14	43
Colorado	719	1Q18	3Q19	6
Florida	727	2Q08	2Q17	36
Tennessee	731	1Q16	1Q17	4
New Jersey	732/848	4Q00	3Q22	87
Michigan	734	3Q03	1Q13	38
Ohio	740	4Q06	1Q08	5
Florida	754/954	4Q02	3Q22	79
Virginia	757	1Q03	2Q10	29
California	760	3Q04	1Q08	14

Table 18 (continued)

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
Minnesota	763	4Q15	4Q19	16
Indiana	765	3Q04	2Q10	23
Florida	772	~~~~	4Q26	N/A
Illinois	773	2Q01	1Q09	31
Nevada	775	4Q06	1Q16	37
Kansas	785	4Q12	4Q12	0
Puerto Rico	787/939	3Q25	3Q25	0
Utah	801	1Q02	2Q08	25
Vermont	802	4Q05	1Q12	25
South Carolina	803	2Q04	1Q10	23
Virginia	804	2Q02	3Q13	45
California	805	4Q03	1Q10	25
Texas	806	3Q13	1Q13	-2
Hawaii	808	3Q08	2Q16	31
Michigan	810	4Q01	3Q19	71
Indiana	812	4Q04	4Q08	16
Florida	813	4Q06	4Q16	40
Pennsylvania	814	1Q05	4Q09	19
Illinois	815	2Q02	2Q06	16
Missouri	816	1Q04	3Q12	34
Texas	817/682	3Q08	4Q19	45
California	818	4Q03	1Q08	17
North Carolina	828	2Q09	3Q10	5
Texas	830	1Q12	1Q12	0
California	831	4Q08	4Q22	56
South Carolina	843	1Q04	1Q11	28
New York	845	2Q09	1Q12	11
Illinois	847/224	3Q00	3Q17	68
Florida	850	1Q08	1Q11	12
New Jersey	856	1Q04	3Q13	38
California	858	3Q09	2Q18	35
Kentucky	859	2Q12	2Q12	0
Connecticut	860	2Q01	1Q09	31
New Jersey	862/973	1Q01	4Q19	75
Florida	863	2Q12	1Q15	11
South Carolina	864	3Q08	4Q13	21
Tennessee	865	2Q14	4Q21	30
Arkansas	870	3Q06	4Q07	5
Tennessee	901	3Q06	2Q15	35
Texas	903/430	3Q21	3Q21	0
Florida	904	1Q09	4Q18	39
Michigan	906	3Q21	3Q21	0

State	NPA	Projected exhaust date prior to pooling implementation	Current NPA exhaust date	Chg in Qtrs
Alaska	907	2Q06	2Q17	44
New Jersey	908	4Q02	2Q10	30
California	909	4Q02	4Q16	56
North Carolina	910	4Q09	4Q10	4
Georgia	912	3Q13	3Q15	8
Kansas	913	2Q09	4Q19	42
New York	914	3Q01	3Q12	44
Texas	915	3Q05	4Q18	53
California	916	2Q05	4Q11	26
Oklahoma	918	1Q03	3Q08	22
North Carolina	919	2Q02	2Q32	120
Wisconsin	920	1Q05	4Q08	15
California	925	4Q07	2Q14	26
Arizona	928	1Q06	4Q20	59
Tennessee	931	1Q13	1Q15	8
Texas	936	4Q13	4Q20	28
Ohio	937	2Q04	3Q10	25
Texas	940	1Q15	1Q20	20
Florida	941	3Q03	1Q20	66
California	949	3Q06	2Q18	47
California	951	NEW	1Q17	N/A
Minnesota	952	1Q13	3Q20	30
Texas	956	1Q13	1Q13	0
Colorado	970	3Q11	3Q11	0
Massachusetts	978/351	3Q07	1Q21	54
Texas	979	3Q10	1Q11	2
Louisiana	985	4Q08	4Q18	40
Michigan	989	4Q07	2Q08	2



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