

National Thousands-Block Pooling Administration

2005 Annual Report

NEUSTAR[®]

Trusted to bring
networks together

This page left blank intentionally.

Mr. Dennis Dorsey
Contracting Officer
FCC/Contracts and Purchasing Center
445 12th Street S.W.
Washington, D.C. 20554

RE: Contract #CON01000016

Dear Mr. Dorsey:

I am pleased to submit the National Thousands Block Pooling Administration (PA) 2005 Annual Report pursuant to Contract Data Requirements List (CDRL) 4.6.1. This report covers PA activities from January 1, 2005 through December 31, 2005.

As directed by Section 2.18.1 of the Thousands-Block Pooling Contractor Technical Requirements, this report contains:

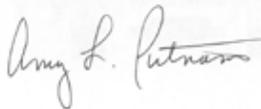
- The highlights and significant milestones we reached during the previous year
- An identification of existing and potential pooling areas
- An aggregated total by pool of service providers participating in the pooled area
- Forecast results, as well as a review of forecasts vs. actual block activation 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

In the PA Annual Report you will see why 2005 was another record year, with significant increases in the number of applications processed and blocks assigned, and the total number of assigned blocks in the Pooling Administration System (PAS). The report also shows how the entire PA team contributed to the overall effectiveness of the PA operation.

NeuStar is now in the fifth year of the national PA contract and we continue to manage thousands-block number pooling services in a neutral manner with accuracy and efficiency pursuant to our contract obligations. As we fulfill the remaining months of our contract, we will continue to work cooperatively and productively with customers, industry groups and regulatory staff.

Should you have any questions about this report, please do not hesitate to contact me.

Sincerely,



Amy L. Putnam, Esq.
Director, Number Pooling Services
NeuStar, Inc.
amy.putnam@neustar.biz
Office: 717-232-5533 / Mobile: 717-877-6205

This page left blank intentionally.

Table of Contents

- 1. History of NeuStar Pooling Administration from 1997-2004 5
- 2. 2005 NeuStar PA Highlights and Significant Milestones 9
- 3. Identification of Existing and Potential Pooling Areas 21
- 4. Aggregated Total by Pool of the Service Providers Participating in the Pooled Areas..... 23
- 5. Forecast Results and a Review of Forecasts versus Actual Block Activation in the Past 27
- 6. System and Performance Metrics 31
- 7. Status of Required Transferable Property 33
- 8. Industry Issue Identification/Feedback..... 35
- 9. Volume of Reports Produced Aggregated by Regulatory Agency, NANC, NANPA and Service Providers..... 41
- 10. Additional Informational Offerings..... 43

This page left blank intentionally.

1. History of NeuStar Pooling Administration from 1997-2004

1.1 Background – 1998 through 2001

In 1997, NeuStar, Inc. [then an autonomous business unit known as Communications Industry Services (CIS) within Lockheed Martin Corporation] 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 Pennsylvania order, the FCC granted limited authority to continue the pooling trial and 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 state pooling trials. In 2001, NeuStar implemented 54 more pooling trials and, by October 15, 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 15, NeuStar implemented the final 25 state pooling trials. In all, we transitioned 97 trials involving 114 NPAs from the state system to PAS.

1.2 National Pooling Administration (PA) – 2002 through 2004

NeuStar PA is an independent, neutral third party responsible for the fair and efficient overall administration of thousands-block numbering resources. It provides high quality service that is free from bias, personal and organizational conflicts of interest, and unprofessional conduct, and is otherwise in compliance with the FCC’s specified neutrality requirements. The PA refrains from providing services to any person or entity that would result in an actual or potential conflict of interest with the performance of this contract with the FCC or otherwise be in conflict with the neutrality criteria.

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.

1.2.1 NeuStar PA’s accomplishments during 2002

- 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.
- 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 more easily meet the FCC-mandated November 24 pooling deadline.

- Transitioned wireless carriers to pooling by the November 24 FCC-mandated deadline.
- Assisted with development of procedures for, and was named administrator for, the modified Unassigned Number Porting (UNP) trial in Connecticut.
- Produced 259 reports for the FCC, state regulatory agencies, North American Numbering Council (NANC), North American Numbering Plan Administration (NANPA) and service providers during the reporting period.
- Submitted 17 issues and 31 contributions to INC.
- Managed the 10,023 total assigned thousands-blocks that were in PAS by the end of 2002.
- Was awarded contract renewal from the FCC for year 2.
- Managed the 29,027 total assigned thousands-blocks that were in PAS by the end of 2003.
- Was awarded contract renewal from the FCC for Year 3.

1.2.3 NeuStar PA's Accomplishments During 2004

1.2.2 NeuStar PA's Accomplishments During 2003

- A successful reorganization took effect on April 29th. As part of this reorganization, Amy Putnam was promoted to Director.
- Pooling Administrators assigned 21,650 thousands blocks, processed 43,473 applications and opened 835 whole NXX codes for LRNs, dedicated customers, and pool replenishment.
- Provided up-to-date Metropolitan Statistical Area (MSA) information to assist wireless industry with its mandated 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 (4) FCC-approved change orders.
- Pro-actively prepared and distributed the first Non-Participating Service Provider Report to address concerns raised by the FCC and the states.
- Produced 170 reports for the FCC, state regulatory agencies, North American Numbering Council (NANC), NANPA and service providers during the reporting period.
- Submitted nine (9) issues and 15 contributions to INC.
- Pooling Administrators processed 69,193 applications and assigned 37,403 blocks, opened 1,978 Central Office (CO) codes, and processed all but one application within 7 days. Over 99.99% of applications were processed within the required timeframe.
- Pooling Implementation Managers (PIMs) conducted 14 Supplemental Implementation Meetings (SIMs) in 122 area codes (NPAs) in 38 states where the pooling status of the affected rate centers was changed as a result of Office of Management and Budget (OMB) Bulletins.
- Implemented five (5) FCC-approved change orders and submitted a total of 12.
- Successfully conducted both operational and technical testing of the PAS pursuant to the Disaster Recovery Plan (DRP).
- Produced 298 reports for the FCC, state regulatory agencies, NANC, NANPA and service providers during the reporting period. In addition, we produced a report for the FCC on carriers not participating in pooling in mandatory areas, as well as numerous internal reports.
- Submitted eight (8) issues and 10 contributions to INC.
- Implemented three (3) website improvements: a "PAS Enhancements" link on our website which allows users to electronically submit suggestions for improvements to the PAS; a formal process for problem resolution; and an extension of the duration of the PAS time-out feature from 15 to 20 minutes.
- 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 (4) states on block application and reclamation procedures.
- Implemented a process to incorporate the requirements of the FCC Debt Collection Improvement Act of 1996, FCC 04-72, MD Docket 02-339, adopted March 25, 2004 (Red Light Rule) into pooling procedures.

- Reclaimed 33 thousands-blocks as authorized by state commissions or FCC .
- Conducted the 2004 PA survey in September pursuant to which 114 surveys were returned with no score under 4.1 out of 5.0.
- Performed audits of all of the rate center files, during which the PIM team assured the accuracy of all information relating to each of the rate centers in PAS.
- Created a monthly report known as Rate Center File Changes, in which the PIM team regularly reported on modified rate center designations for the benefit of service providers.
- Participated in the FCC “Future of Numbering” symposium, during which PA Director Amy Putnam discussed the “State of the NANP.”
- Prepared and distributed a Non-Participating Service Provider Report in July 2004.
- Managed the 61,118 total assigned thousands-blocks that were in PAS by the end of 2004.
- Was awarded contract renewal from the FCC for Year 4.

1.3 The NeuStar PA Organization

Amy L. Putnam, Esq. is the Director of NeuStar PA. Amy reports to Michael O’Connor, 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 Tech-Ops group.
3. **Pooling Implementation Management** carried out the implementation of the national pooling rollout schedule established by FCC orders. This team continues to be responsible for the ongoing management and quality control of rate center file data, as it is affected by FCC Orders, OMB Bulletins, state directives, and carrier requests; as well as any pooling implementation that may become necessary as a result of these documents or activities. They also play a significant role in fulfilling the requirements of National Pooling Administration’s Disaster Recovery and Business Continuity of Operations Plan. 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/pooling/index.htm>.

This page left blank intentionally.

2. 2005 NeuStar PA Highlights and Significant Milestones

“Keep up the great work. We very much appreciate, and enjoy, the “can do” attitude of the people in PA.”

-- State Regulator Sept 2005

Following is a synopsis of the major pooling accomplishments of NeuStar, as national Pooling Administrator (PA) during the 2005 reporting period.

Thousands-block pooling. The PA processed 102,304 applications, assigned 55,990 blocks, and processed 7,768 disconnects during 2005. The total number of assigned blocks in the Pooling Administration System (PAS) as of December 31 was 109,420. We also opened 2,385 Central Office (CO) codes. (See Section 2.1.1)

Pooling Administration System (PAS) and Website. In 2005 the PA implemented nine (9) Change Orders (27, 30, 31, 32, 33, 36, 37, 38, 39). The PA submitted eight (8) Change Orders to the FCC in 2005, proposing a variety of system or process changes that are not addressed in our current contract with the FCC. All approved Change Orders were implemented on time and within or under budget. (See Section 2.2)

In addition, we successfully conducted both operational and technical testing of the National PA Disaster Recovery Plan (DRP) during the week of May 16 and completed PAS operating system, database, and application upgrades on August 21. (See Section 6.2)

We also proactively examined and reviewed our website, enhancing its navigability and improving information integrity. (See Section 2.1.2)

Comprehensive and timely reporting. As PA, we produced 2,572 reports for the FCC, state regulatory agencies, the North American Numbering Council (NANC), NANPA, and service providers during the reporting period. (See Section 9.0).

Industry support. In 2005, the PA participated in four (4) 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 ten (10) issues and fourteen (14) contributions to INC. (see Section 8.0)

Pooling Implementation Management continued the quality control and maintenance of the rate center files that is so critical to service providers. (See Section 2.3)

Regulatory and Compliance. In 2005, the PA attended the California 310 NPA state commission public meetings; conducted one informational conference call on pooling issues and procedures that included a PAS refresher for state commission staff; participated in five (5) in-person pooling education meetings with state commissions; and responded to over 175 inquiries on block applications, mandatory and optional pooling, safety valve, and reclamation procedures. The PA also responded to the issuance of FCC and state orders and fulfilled all reporting requirements in 2005. (See Section 2.4)

2.1 Pooling Administration, Concord CA

The pooling administrators are always courteous and helpful. It is refreshing in any business today where you see that there is not a constant turn over of employees. It is easier to establish a good working relationship especially with people that you trust and like.

-- Service Provider Sept 2005

2.1.1 Pooling Administration Productivity for 2005

In 2005, there were 102,304 applications processed by the PA as shown in Table 1:

Table 1. 2005 Processed Applications

Approvals	87,571
Denials	8,420
Suspensions	6,313

Table 2 illustrates the total number of application processed by activity type.

Table 2. 2005 Processed Applications by Activity Type

	Approved	Denied	Suspended	Total
Block Modifications	16,768	727	0	17,495
Block Disconnects	7,625	143	0	7,768
Individual Blocks	49,591	4,080	0	53,671
Block Transfers	2,695	192	0	2,887
LRN Blocks	1,510	526	1,043	3,079
Dedicated Blocks	1,351	82	134	1,567
Pool Replenishment Blocks	3,538	543	1,372	5,453
Manual	4,493	2,127	3,764	10,384
Totals	87,571	8,420	6,313	102,304

Table 3 sets forth the number of whole NXX codes opened by the PA in 2005 and for what purpose.

Table 3. NXX Codes Opened in 2005

Purpose	Total
LRN	945
Dedicated Customer	135
Pool Replenishment	1,305
TOTAL	2,385

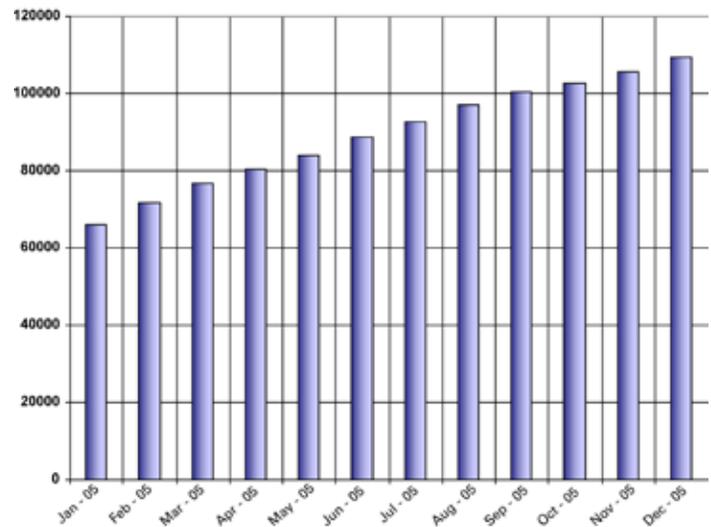
The PA also issued 8,358 Part 5s as a result of disconnects, reclamation, and block exchanges during 2005.

The PA processed 99.99% of applications within 7 calendar days during 2005. Only 14 applications were not processed within 7 calendar days during the entire year.

During 2005, the level of activity managed by the National PA continued to grow steadily. The total number of thousands-blocks assignments increased by almost 50% during 2005. Also, the number of applications processed per month increased by almost 50%.

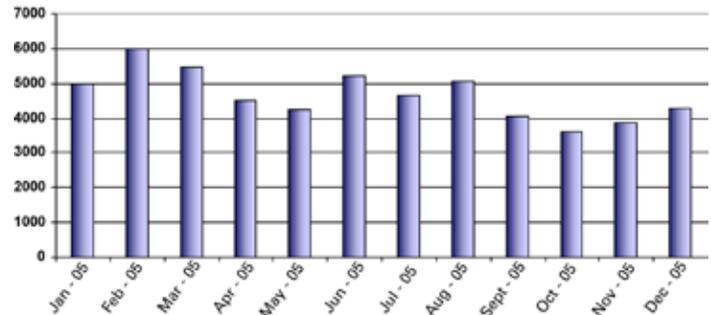
Chart 1 provides the cumulative number of thousand-blocks assigned in the PAS during 2005.

Chart 1 - 2005 Cumulative Total Assigned Blocks



In order to represent the actual increases in the monthly volume of assignments, Chart 2 depicts the monthly block assignments during 2005.

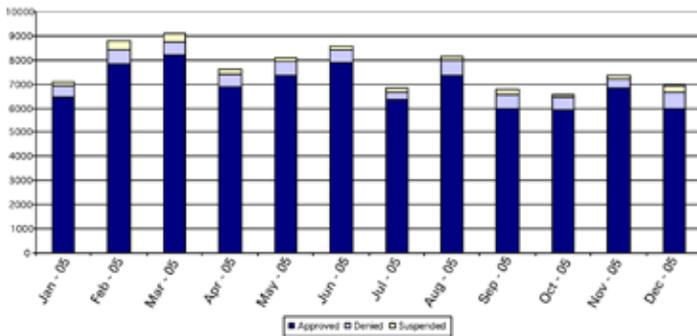
Chart 2 - 2005 Monthly Block Assignments



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 complete overview of all applications processed in the PAS for 2005, which includes approvals, denials, and suspended applications.

Chart 3 - 2005 Pooling Administration System Applications



2.1.2 Website

“It’s rare these days to find a website that functions consistently and has been well planned. I can’t think of anything that needs improving on it.”

-- Service provider Sept 2005

On our own initiative, we implemented a complete overhaul of the www.nationalpooling.com website, which culminated on January 24, 2005, enhancing its navigability and improving information integrity. We completely redesigned the home page to facilitate searches and included a “Quick Links” section located in the middle of the homepage, which lists frequently visited sections of the website. There is also a Site Map, which provides an easy, one-page reference to the various website pages and their contents, multiple links to PA contacts and customer support and an informational notice section to direct users to new notices. The PA staff reviews the website on a continual basis and at their staff meetings to ensure that the information is kept current.

2.1.3 Reclamation

NeuStar PA initiates reclamation according to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (TBPAAG) which direct that, “[a] thousands-block assigned to an SP should be placed into service by the applicable activation deadline, that is, six-months after the original effective date returned on the Part 3 and entered on the BCD/BCR screen in BIRRDS.” Each thousands-block assignment has an associated “Part 3 effective date,” which is the date the numbers in the thousands-block become available to be assigned to customers. 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 identified on the Part 3, the PA 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 is eligible to be reclaimed. By the 10th calendar day of each month, the PA sends a list of delinquent Part 4s for the thousands-blocks from the previous month to the appropriate state commission or FCC. The FCC Report and Order and Further Notice of Proposed Rulemaking released March 31, 2000 (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 2005, the state commissions or FCC authorized reclamation of 78 thousands-blocks.

2.1.4 PA Survey

Each year the PA publishes an annual survey through which service providers and regulators assess our performance. The survey functions as an issue identification method that assists us with process enhancement and improved customer service. It is not a requirement of our FCC contract and is not connected with the annual performance survey completed by the Numbering Oversight Working Group (NOWG) for the NANC.

The 2005 survey, which was conducted in September so as not to interfere with the NANC survey sent earlier in the year, and was both placed on the home page of the national pooling website and sent to participants via email. Survey participants had a choice of completing the survey online or returning the survey via email or fax. There were 134 surveys returned, which was a 17.5% increase over the 114 surveys returned in 2004.

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 measured performance in the two areas most involved with user interface, pooling administration and implementation.

In the 2005 results, questions regarding performance of PA personnel showed a high level of satisfaction with scores of 4.5 or higher. Scores on the PAS improved from an overall score in 2004 of 4.1 to an overall score of 4.4 for PAS performance. A new section was added to the 2005 survey to allow input on the pooling website. The website scores showed a high of 4.5 for accessibility and an overall score of 4.2. The scores in all previously existing areas showed an improvement from the 2004 scores.

Table 4 lists the actual questions and average survey response scores for 2005:

Table 4. Performance Survey Results

Surveys Returned = 134	Average Score
The Pooling Administrators are knowledgeable about the thousands-block application processes.	4.6
The Pooling Administrators are courteous and helpful.	4.7
The Pooling Administrators respond to emails and phone calls within one business day.	4.5
I am satisfied with the level of service provided by the Pooling Administrators.	4.6
The Pooling Implementation Managers provide detailed information regarding pooling at industry meetings.	4.5
The Pooling Implementation Managers respond to emails and phone calls within one business day.	4.5
The Pooling Implementation Managers are knowledgeable about rate centers, and refer me to the pooling guidelines, websites, or other appropriate references, when necessary.	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.	4.6
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
The Help Desk is helpful 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.	4.5
The Pooling Administration System (PAS) allows me to easily fill out and submit applications, donations, forecasts and Part 4's.	4.3
PAS provides sufficient reporting capabilities to meet my needs.	4.2
The Pooling Administration System (PAS) is consistently available.	4.5
I am satisfied with the level of service provided by the Pooling Administration System (PAS)	4.4
The website was accessible when I needed it.	4.5
I was able to locate pooling-related information easily on the website.	4.1

Information on the website is useful to me.	4.3
Overall, I'm satisfied with the website.	4.2
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

2.1.5 PAS Refresher

On September 27, 2005, the PA conducted a refresher overview session for non-regulatory PAS users of the PAS and the pooling website with 141 affirmative RSVPs. The PA distributed a survey to participants in order to obtain feedback on the presentation and address any questions that participants may have had after the overview session for service providers. Based on the feedback and questions raised, the PA created a "Questions & Answers" document, which was distributed to participants via email and posted to the national pooling website.

The PA also conducted a session for regulatory staff on October 20. (See Section 2.4.1 for details)

2.1.6 Hurricane Disaster Relief Efforts

In support of the disaster recovery efforts as a result of hurricanes Katrina and Rita, the PA worked closely with the service providers impacted by the storms by handling their applications in an expedited manner under the guidance of the FCC. Following is a summary of block assignments attributed to hurricane disaster relief. There were no requests for blocks associated with hurricane Wilma.

Table 5. Hurricane Disaster Relief Block Assignments

Hurricane	Number of Blocks Assigned	Number of Requesting Service Providers
Katrina	69	8
Rita	19	3
Katrina and Rita*	10	2

*Totals from this line are separate and are not included in the individual hurricane totals above.

2.2 Pooling Administration System (PAS)

2.2.1 Pooling Administration System (PAS) Improvements/Change Orders

Improvements to the PAS are driven by changes to FCC rules, industry guidelines, and specific service provider or regulator requests. If these suggested improvements or changes require a change to our contract, change orders are submitted to the FCC. The Numbering Oversight Working Group (NOWG) currently reviews PA change order proposals and provides recommendations to the FCC on their disposition. To facilitate the review process, the Regional Director-External Relations serves as our liaison with the NOWG to address any issues that may arise, and to respond to their questions.

The PA submitted eight (8) Change Orders to the FCC in 2005, proposing a variety of system or process changes that are not addressed in our current contract with the FCC. Table 6 provides a description of each 2005 change order, and its status as of December 31.

Table 6. Change Orders Submitted by the PA in 2005

Num	Type	Description	NOWG Recommendation	FCC Status
38	2004 Survey	PAS User's Proposed Enhancements to the PAS	Approved	Accepted 7/14/2005
39	Part 4 Report (Service Provider)	Thousands-Block Part 4 Report	Approved	Accepted 7/14/2005
40	Internal	Request for Additional Pooling Administrator	Rejected	Rejected 7/14/2005
41	Issue 364 & LNPA WG PIM 24	LNPA WG PIM 24 and CO/NXX Issue #364 - "Modification to Procedures for Code Holder /LERG Assignee Exit"	Approved	Pending
42	NOWG Recommendation	NOWG Request for Monthly Meeting with PA	Approved	Pending
43	Issue 475	Updated Appendix 1: Thousands-Block Forecast Report Directions (INC issue 475)	Approved	Pending
44	Issue 486	Contaminated or Pristine Assigned Block Returns (INC issue 486)	Approved	Pending
45	2004 NOWG Survey	PAS users' proposals from the 2004 NOWG Survey	N/A	Pending

The FCC acted on fourteen (14) change orders in 2005, accepting ten (10), rejecting two (2), and canceling two (2). Table 7 provides details on each change order for which there was an FCC decision in 2005.

Table 7. Change Orders Acted Upon by the FCC

Num	Type	Description	Notes	NOWG Recommendation	Status
24	Issue 364 & LNPA WG PIM 24	LNPA WG PIM 24 and CO/NXX Issue #364 - "Modification to Procedures for Code Holder /LERG Assignee Exit"	Resubmit as Change Order 39	Rejected	Cancelled 1/7/2005
25	Part 4 Report (Service Provider)	Thousands-Block Part 4 Report	Combine 25 & 34 and Resubmit as Change Order 39	Rejected	Cancelled 1/7/2005
30	Issue 423	LERG Assignee Confirmation of Activation in PSTN for Industry Inventory Pool		Approved	Accepted 1/7/2005
27	Forecast Report (Service Provider)	Extending the Forecast Report		Rejected	Accepted 1/7/2005
31	Donation Report (Service Provider)	Expand Query Options for Donation Report		Approved	Accepted 1/7/2005

Table 7 (continued)

Num	Type		Description	Notes	NOWG Recommendation	Status
32	Work Items (Service Provider)	(Service Provider)	Modify Process for Deleting PAS Work Items		Approved	Accepted 1/7/2005
33	Search/View Form (Service Provider)	(Service Provider)	Modify Search Forms/View Form Query		Approved	Accepted 1/7/2005
34	Part 1A Report (Service Provider)	(Service Provider)	Modify Part 1A Report	Combine 25 & 34 and Resubmit as Change Order 39	Rejected	Rejected 1/7/2005
35	Red Light Rule		Red Light Rule Interim Manual Process		Approved (w/ modification)	Accepted 1/7/2005
36	Red Light Rule		Red Light Rule System Modification		Approved (w/ modification)	Accepted 1/7/2005
37	Issue 458		Reduce Aging Period for Returned/Reclaimed Blocks	Previously rejected on 7/14/05	Approved	Accepted 10/27/2005
38	2004 Survey		PAS User's Proposed Enhancements to the		Approved	Accepted 7/14/2005
39	Part 4 Report (Service Provider)		Thousands-Block Part 4 Report		Approved	Accepted 7/14/2005
40	Internal		Request for Additional Pooling Administrator		Rejected	Rejected 7/14/2005

Table 8 shows nine (9) change orders, with descriptions of the changes that were incorporated into the PAS in 2005.

Table 8. Change Orders Implemented in the PAS in 2005

Number	Description of Changes	Implemented
27	Expanding the Forecast Report: The Forecast Report has been expanded from showing twelve months of forecasted data to now showing eighteen months of forecasted data.	April 4, 2005
30	LERG Assignee Confirmation of Activation in PSTN for Industry Inventory Pool: Internal changes have been made to support the resolution of INC Issue 423. The Block Report will highlight those available blocks in RED that are pending verification of activation in the PSTN from the LERG assignee. In addition, on the Block available date, an email notification will be sent to the service provider requesting verification that the code is active in the PSTN, loaded in the NPAC and that all other LERG responsibilities have been fulfilled. Follow-up notices will be sent every 10 calendar days until a positive verification response is received or until the code is reclaimed.	April 4, 2005
31	Expand Query Options for Donation Report – Service Provider Enhancement: The query options for the Donation Reports have been expanded to allow service providers to query the report by NPA and/or by OCN and to sort the report by rate center or by OCN.	April 4, 2005
32	Modify Process for Deleting Work Items – Service Provider Enhancement: On the Work Item Summary screen, a new capability has been added for service providers only, which allows them to delete all of their work items at once. Alternatively, they can individually select which individual work items to delete.	April 4, 2005
33	Modify Search Forms/View Form query – Service Provider Enhancement: On the "View Forms" screen, when a user enters a block (NPA-NXX-X), PAS will retrieve only the forms that are associated to the specified block.	April 4, 2005
36	Red Light Rule System Modifications: Internal changes were made to support the FCC Red Light Rule.	April 4, 2005

Table 8 (continued)

Number	Description of Changes	Implemented
38	<p>PAS Users' Proposed Enhancements to PAS – 1Q2005:</p> <p><i>Ability to Add Additional Contacts to a PAS Profile</i> - Service providers have the option of adding up to three additional contacts to their user profile which will then enable them to have PAS send the following types of emails to those contacts: Part 3s, Part 4 Reminders, Semi-Annual Forecast Reminder, completed Part 1B and rejected Part 1B.</p> <p><i>Ability to Request Multiple Effective Dates</i> - Service providers have the ability to request multiple effective dates for the following types of requests: Individual Block Requests, Full NXX Requests on Behalf of the PA, Full NXX Request for a Dedicated Customer and Full NXX Request to Establish an LRN.</p> <p><i>Ability to Reset Your Own PAS Password</i> - PAS users have the ability to reset their password in PAS. PAS will continue to generate the new password.</p> <p><i>PAS User ID De-Activation Reminder Email Notification</i> - When there has been no activity in PAS for 110 calendar days, PAS will automatically generate an email notification to users indicating that they will be de-activated if they do not log into PAS within 10 calendar days of receiving this notification. If the user still does not log into PAS after the initial notification, a second and final email notification will be sent three days prior to account deactivation.</p> <p><i>Block Report</i> - When viewing the Block report, users now have the ability to select a rate center as part of their search criteria in addition to the state and NPA.</p> <p><i>Modified Processed Donation Email Notification</i> - The Donation emails now include the disposition of the donation in the body of the email e.g. "Your Donation of block NPA-NXX-X was (rejected/accepted).</p> <p><i>Modified OCNs</i> - OCNs listed anywhere in PAS are now in numerical order.</p>	November 7, 2005
39	<p>Thousands-Block Part 4 Report:</p> <p><i>Part 4 Report</i> - The Part 4 Report lists all of the Part 4s that have been submitted via PAS. Users may now query this report by state, NPA, OCN, and date range. The report contains the state, NPA-NXX-X, OCN, type of request, rate area, assignment date, effective date, in-service date, part 4 receipt date, and the name of the PAS user who submitted the Part 4.</p> <p><i>Assignments Needing Part 4 Report</i> - The Assignments Needing Part 4 Report lists assigned thousands-blocks which have no Part 4 on file. Users may now query this report by state, NPA, OCN, and date range. The report contains the state, NPA-NXX-X, OCN, type of request, rate area, assignment date, effective date, and Part 4 due date.</p>	November 7, 2005
37	<p>Reduce Aging Period for Returned/Reclaimed Blocks (INC Issue 458): Once a thousands-block is returned or reclaimed, it is made available immediately in the pool inventory, however the earliest effective date that can be established for reassignment has been reduced from 90 calendar days to 45 calendar days from the date of disconnect.</p>	December 12, 2005

2.3 Pooling Implementation Management

2.3.1 Rate Center Files

The Pooling Implementation Management (PIM) team manages the quality control and maintenance of the rate center files located on the website. The rate center files identify the participation status designation of all rate centers in each NPA, including where service providers (SPs) are either required to participate in pooling (Mandatory), are required to participate when a second service provider enters the rate center (Mandatory Single Service Provider), may participate in pooling (Optional), or where there is currently no pooling (Excluded).

There are currently five different status designations of rate centers. For details about the rate center designation definitions, see Section 3.0.

The PIM team not only developed the mechanism for recording all of the pooling information associated with every NPA, including the status designation for each rate center, but also was responsible for the maintenance and tracking of all changes related to pooling that occurred as a result of FCC orders and Office of Management and Budget (OMB) directives.

The OMB issued two directives during 2005 which potentially affected rate centers and therefore required action by the PA. The first, OMB Bulletin 05-02, was issued on February 22. The impact of the changes on the rate center files itemized

in this directive was minimal: three MSA name changes involving top 100 MSAs, 12 NPAs and 139 rate centers. The PIMs performed the necessary modifications to keep the rate center files current and maintain their accuracy.

Then, on December 5, 2005, the OMB issued Bulletin 06-01, which superseded the one issued in February 2005; again, the changes had a nominal affect on the information contained in the rate center files. The analysis performed by Pooling Administration showed two MSA name changes in the top 100 MSAs that affected 128 rate centers in five NPAs.

Table 9 below details the actions taken by the PIMs on rate center files in 2005.

There are other circumstances, as indicated below, in which rate center modifications are required in both PAS and rate center files. These situations are incorporated into the PIM workload as required.

- State regulators as well as service providers can request that rate centers be added to the pool. In 2005, two states¹ requested that all excluded rate centers be made optional.
- Analysis by the PIMs of applicable databases and their use of associated reference material can lead to the modification of the rate center files.
- The addition of a second SP in a mandatory rate center (currently identified as M*) requires an update in the status designation and may necessitate notification to the first SP if it is, in fact, not already participating in pooling. This

¹Missouri & New York

analysis is done on a scheduled basis every week.

- Rate center consolidations ordered by a state commission, or filed as a tariff by service providers, also result in modifications to PAS and the rate center files.
- The implementation of NPA relief plans requires modification to the rate center files and PAS. Dependent upon the type of relief plan (overlay or split), this could result in the preparation and posting of new rate center files.
- Block transfer requests from a non-pooling environment to a pooling environment also result in modifications to the rate center files and PAS.

2.3.2 Pooled Codes not in the NPAC SMS Project

Based on discussions at the LNPA WG during Problem Identification and Management (PIM) Report 24, and to minimize any delays block holders may experience when attempting to activate their thousands-blocks in the NPAC, the PA voluntarily took on the project of determining which blocks in the PAS have been donated from codes that have not been opened in the NPAC SMS. We utilized a new “Codes” link on the NPAC public website which provides a list of codes that are opened in the NPAC SMS by NPAC region.

The PA compiled a list of codes from the PAS that had thousands-block(s) available in the pool inventory and compared that list to the codes on the NPAC public website, discovering that there were 450 codes that were not opened in the NPAC SMS.

Table 9. Actions Taken on Rate Center Files

Reason	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Totals
Changes in Status:													
M' to 'M**'		9								2			11
M' to 'O'		1				6							7
M** to 'M'	21	13	64	12	6	14	15	2	1	5	1	10	164
O' to 'M'	1												1
O' to 'X'	1												1
X' to "O"	359	47	6	6	6	144	12	27	11	9	7	98	732
X' to 'M'					6								6
New Rate Center		1	1					1	4		6	3	16
Rate Center Removal	1					1	1		2	3	4	4	16
Rate Center Name Correction								1					1
MSA/Rate Center Association Updates (OMB Bulletins)		139										128	267
Totals	383	210	71	18	18	165	28	31	18	19	18	243	1222

The PA sent two notices by email to those code holders affected, informing them that if they did not open their code in the NPAC SMS, their code would be removed from the pool inventory and the PA would notify the state commission and FCC. If the code holder didn't comply with either notice, the PA attempted to contact the code holder by phone as the last and final attempt. In the end, the PA was able to reduce this list from 450 codes to 3 codes.

2.4 Regulatory and Compliance

2.4.1 Training updates

In 2005, the PA attended the California 310 NPA public meetings as a resource for pooling inquiries and participated in five (5) in-person pooling education meetings.¹ In addition there were over 175 inquiries regarding block applications, pooling rate center designations and participation, and safety valve and reclamation procedures.

On October 20, 2005, the PA conducted one (1) conference call for regulatory personnel, with participation from 18 staff members from 15 states. We updated the participants on pooling issues and procedures, as well as conducted a refresher on the PAS and website navigation. Notes on the meeting were sent to all regulatory contacts.

2.4.2 Regulatory Orders

2.4.2.1 Implementation of SBCIS Order

On January 28, 2005, the FCC adopted ruling FCC 05-20 to allow SBC Internet Services, Inc. (SBCIS) to obtain numbering resources directly from the NANPA or PA for the use in deploying IP-enabled services. The order specified certain requirements to be able to obtain numbering resources from the PA, including demonstration of interconnection or facilities readiness, submission of the applications to the state commissions and FCC thirty days prior to applying for the resources, and meeting months-to-exhaust for growth applications. The PA worked with SBCIS to establish a process which met the requirements of the order, and worked with state commissions to assist them in providing the required documentation to accompany the applications.

The FCC asked the NANC to review how the numbering rules should be modified to allow IP-enabled service providers access to numbering resources in a manner consistent with the FCC's numbering optimization policies. The Future of Numbering IMG (FON) has addressed this in its working group and made a recommendation to the NANC.

¹ Idaho, North Dakota, Nebraska, Washington, New Mexico

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

The "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, 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. 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.

In 2005, the FCC approved Change Order #36 for changes to the PAS to support the Red Light Rule. (See Section 2.2.1)

The PA processed 190 denials as a result of the Red Light Rule in 2005.

2.4.2.3 Virtual NXX

During 2005, the PA followed proceedings in two states, New Hampshire and Michigan, regarding use of telephone numbers assigned to a rate center for billing purposes, when the customer is not physically located in that rate center.

The New Hampshire proceeding, DT 00-223. DT 00-054 Investigation as to Whether Certain Calls are Local, was initiated in 2000 and culminated in a process for addressing internet-access assignments in 2005. The Michigan Commission initiated a docket on November 22, Case No. U-14683, directing that a collaborative process begin immediately to address virtual NXX issues, with a preliminary meeting held Monday, December 5.

The PA participates as an information resource regarding pooling processes and as an observer to ensure that nothing agreed to by the Commission and industry involving the PA is contrary to the current FCC contract, industry guidelines, and/or practice.

New Hampshire: DT 00-223. DT 00-054 Investigation as to Whether Certain Calls are Local.

On July 18, 2005, the New Hampshire Public Utilities Commission (NPUC) established the effective dates for agreements approved in DT 00-223. DT 00-054 Investigation as to Whether Certain Calls are Local, Order Approving Agreements, Order No. 24,419. December 30, 2004. The Commission opened this docket in 2000 to address customer complaints that they were receiving toll charges for calls to numbers assigned to exchanges within the customer's local

calling area. Ultimately the Commission determined that a number of Competitive Local Exchange Carriers (CLECs) were using telephone numbers assigned to an exchange for the purposes of billing and intercarrier compensation, when the customer using the assigned number was not physically located in the geographic area served by the exchange, a practice known as “Virtual NXX” or “VNXX”. In the VNXX Order, the Commission determined that it would permit VNXX in limited circumstances. It concluded that two particular applications of VNXX were reasonable and in the public interest: 1) a statewide service for information access called IANXX, could be used for dial-up calls to ISPs for access to the Internet; and 2) once a CLEC is provisioning indisputably local service in an exchange, the CLEC could offer CLEC Foreign Exchange (FX), which it defined as “FX-like service for non-ISP bound traffic provided by a CLEC that is [also] providing local dial tone via its own facilities.” (VNXX Order at p. 56). The Commission then laid the groundwork for how they would be implemented, while acknowledging that technical discussions were needed on the details of implementation. The order established a new rate center for the use of IANXX carriers, and the new NHISP rate center became operative on August 20.

PA staff met with NHPUC staff several times to ensure that the order could be implemented without any changes to PA procedures. The NHPUC and the PA reached a cooperative agreement for processing applications in New Hampshire that was effective August 29 that involved the NHPUC staff informing the PA on a daily basis about whether existing wireline applications were consistent with the order, and could be processed or denied.

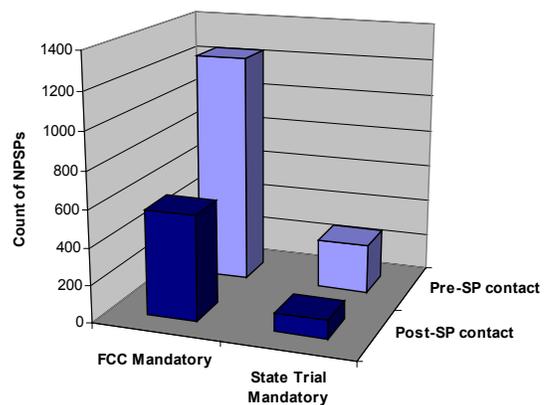
Further action was taken by carriers in this docket to halt this process and it is possible that the new rate center will be frozen in the future; but as of December 31, the established process remained in effect.

2.4.3 Non-Participating Service Provider Report

During 2005, the PA continued with production of its non-participating service provider report. The PA completed the process of identifying and notifying non-participating service providers twice during 2005, in January and November. While the January report contained only mandatory pooling areas from the national rollout, the November report added existing mandatory pooling areas from state pooling trials. The PA provided the list to the FCC and affected state regulatory agencies of all service providers that were not participating in pooling in mandatory pooling rate centers.

Prior to submitting the report to the FCC and the states, attempts were made to contact all service providers on the initial report to inform them of their status, and service providers were given ample time to correct any problems by entering a current forecast or donating blocks. The laborious process of early notifications gave service providers an opportunity to correct any inadvertent omissions prior to submission of the report to the FCC and the states. A direct result of the PA’s efforts to notify and work with non-participating service providers was that pooling participation increased, resulting in far fewer instances of non-compliance due to an increase in the completion of forecasts and the donation of additional blocks. Chart 4 depicts the reduction in the number of non-participating service providers before and after the notification process.

Chart 4 - Non-Participating SP Report



An additional benefit of performing this process was to identify potentially stranded numbering resources. In our attempts to communicate with all service providers that were not participating in pooling, we could not contact a number of companies. We conducted extensive research to attempt to reach these companies (through LERG contact information, phone directories, internet searches). In many cases, it was determined that the company had apparently ceased business operations. In cases where strong evidence suggested that the company had ceased business operations, these numbering resources (i.e., CO Codes) were forwarded to NANPA for potential code reclamation. In the November report, 280 CO codes were identified as potentially reclaimable.

2.4.4 Daily Activity Reports for State Regulators

On April 7, 2005, in response to suggestions received from state regulatory staff regarding their need to be able to observe daily application activity in their states, the

PA made a confidential daily activity report available to requesting states. This resulted in an exponential increase in the number of reports by the PA because initially nine (9) states signed up for the report and by the end of 2005, 11 states were receiving the report. The report is sent daily by email and consists of daily Part 1A and Part 3 activity for the state. In 2005, there were 2,313 daily activity report reports generated for state commissions.

2.4.5 Compliance

In 2005, the PA complied with the following applicable Contract Data Requirements List (CDRL) items.

4.6.1 Annual - The contractor shall provide an Annual Report per Section 2.18.1.

4.6.2 Semi-Annual

4.6.2.1 Forecasted Demand - The contractor shall provide a forecasted demand report per Section 2.14.1.

4.6.2.2 Rate Area Inventory Pool Status - The contractor shall provide a rate area inventory pool report per Section 2.18.

4.6.3 Quarterly

4.6.3.1 Pooling Matrices - The contractor shall provide a pooling matrices report per Section 2.18.2.

4.6.4 Monthly

4.6.4.1 Thousands-Block Pooling - The contractor shall provide a monthly report to the FCC on thousands-block pooling assignments per Section 2.18.

4.6.4.2 System Performance - The contractor shall provide a monthly report to the FCC on system performance per Section 2.19.

4.6.4.3 Staffing - The contractor shall provide a monthly report to the FCC on staffing per Section 2.3.

4.6.5 By Request - The contractor shall, from time to time, be requested to provide ad hoc reports per Section 2.18.3.

4.9 Transition Plan - The contractor shall furnish a Transition Plan within 180 calendar days of contract termination per Section 3.20.5.

This page left blank intentionally.

3. Identification of Existing and Potential Pooling Areas

As of December 31, there were 18,657 distinct rate centers¹, of which 13,168 are pooling rate centers and 5,489 rate centers are excluded from pooling. Of the total pooling rate centers, nearly 52%, or 6,833, are mandatory, either because of a state pooling trial order, or by FCC directive in a top-100 MSA. Of the total number of mandatory rate centers, 675 are single-service provider mandatory, meaning that pooling is presently optional there because only one service provider is operating 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. In 2005, 162 rate centers were changed from single-service provider mandatory to mandatory. Approximately 48% of the pooling rate centers in PAS are designated as optional.

Following is a list of the number of existing pooling areas (rate centers). Pursuant to the FCC-approved national rollout schedule and subsequent Metropolitan Statistical Area (MSA) changes, we have held implementation meetings in all NPAs in the United States and Puerto Rico. Thousands-Block Number 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.

All states have implemented thousands-block number pooling. Only five (5) states have no mandatory pooling areas: Alaska, Montana, North Dakota, South Dakota, and Wyoming.

3.1 Identification of existing pooling areas

Table 10 identifies, by state, the number of pooling areas (i.e., distinct rate centers) as of December 31, 2005. 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, above).

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 or in this report.

¹ The 2005 total counts each rate center in an overlay area as a separate distinct rate center.

Table 10. Pooling Areas by State

State	M	M*	M	O	X	Total
AK				2	282	284
AL	57	12		157	84	310
AR	31	16		120	215	382
AZ	24	23		30	57	134
CA	440	14	83	150	54	741
CO	19	7	5	90	90	211
CT	70		19			89
DC	1					1
DE	8			22		30
FL	120	2	25	92	43	282
GA	68	12		120	161	362
HI	1			5		6
IA	43	66	52	276	380	817
ID	9	10		60	67	146
IL	210	44		489	246	989
IN	187	35	74	172	58	526
KS	45	41		143	345	574
KY	41	6		255	68	370
LA	61	7		141	76	285
MA	232		30		2	264
MD	112		53			165
ME	37	13	101		98	249
MI	203	11		328	94	636
MN	37	13		183	415	648
MO	133	25	103	468		729
MS	31	8		120	80	239
MT				105	155	260

State	M	M*	M	O	X	Total
NC	128	10	24	197	72	431
ND				69	231	300
NE	23	11		427		461
NH	32		92	3	22	149
NJ	187	1		21		209
NM	10	5		42	106	163
NV	20	5		37	32	94
NY	408	6	196	149		759
OH	306	67		271	98	742
OK	89	52	15	133	241	530
OR	35	1	103	3	112	254
PA	398	18	97	123	141	777
PR	49	1		36		86
RI	25					25
SC	78	29		88	45	240
SD				75	198	273
TN	100	9		155	77	341
TX	271	54	7	476	469	1,277
UT	18	5	10	43	65	141
VA	119		184	11	55	369
VT			101		40	141
WA	62	2	105	20	56	245
WI	97	31		221	253	602
WV	4	3		156	65	228
WY				51	41	92
Total	4,679	675	1,479	6,335	5,489	18,657

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

Table 11 is a summary of the aggregated total by pool of the service providers participating in the pooled areas in 2005. There are 1,745 distinct service providers participating in 13,168 distinct pooled areas in 241 NPA areas covering 52 jurisdictions -- 50 states, the District of Columbia, and Puerto Rico. An NPA area may consist of multiple individual NPAs in an overlay situation.

Table 11. Aggregated Total by Pool of Service Providers

State	NPA area	Service Providers	Rate Centers	State	NPA area	Service Providers	Rate Centers
AK	907	1	2	CA	858	28	8
AL	205	28	62	CA	909	34	21
AL	251	26	31	CA	916	34	16
AL	256	28	67	CA	925	27	17
AL	334	21	66	CA	949	34	7
AR	479	13	28	CA	951	35	20
AR	501	25	47	CO	303/720	29	16
AR	870	22	92	CO	719	22	32
AZ	480	22	1	CO	970	19	73
AZ	520	22	27	CT	203	32	32
AZ	602	23	1	CT	860	28	57
AZ	623	21	1	DC	202	30	1
AZ	928	24	47	DE	302	26	30
CA	209	30	54	FL	239	22	14
CA	213	35	3	FL	305	23	1
CA	310	41	16	FL	305/786	38	4
CA	323	39	12	FL	321	28	5
CA	408	31	11	FL	321/407	41	17
CA	415	36	14	FL	352	23	44
CA	510	30	13	FL	386	30	21
CA	530	32	90	FL	561	32	7
CA	559	26	57	FL	727	32	5
CA	562	35	9	FL	754/954	36	5
CA	619	29	11	FL	772	25	8
CA	626	38	10	FL	813	37	8
CA	650	31	15	FL	850	28	47
CA	661	34	32	FL	863	30	22
CA	707	36	75	FL	904	30	20
CA	714	41	13	FL	941	34	11
CA	760	40	83	GA	229	20	30
CA	805	39	40	GA	404/678/770	44	2
CA	818	39	16	GA	478	20	28
CA	831	28	24	GA	678/770	53	41

Table 11 (continued)

State	NPA area	Service Providers	Rate Centers	State	NPA area	Service Providers	Rate Centers
GA	706	52	72	ME	207	23	151
GA	912	21	27	MI	231	26	77
HI	808	12	6	MI	248/947	34	20
IA	319	15	59	MI	269	34	76
IA	515	22	66	MI	313	30	6
IA	563	15	57	MI	517	35	75
IA	641	25	126	MI	586	30	11
IA	712	24	129	MI	616	34	36
ID	208	31	79	MI	734	39	33
IL	217	25	189	MI	810	31	47
IL	224/847	31	42	MI	906	9	50
IL	309	24	84	MI	989	30	111
IL	312	32	1	MN	218	23	53
IL	618	36	194	MN	320	25	58
IL	630	30	26	MN	507	28	86
IL	708	28	32	MN	612	27	1
IL	773	33	10	MN	651	32	14
IL	815	40	165	MN	763	29	11
IN	219	29	45	MN	952	30	10
IN	260	23	74	MO	314	27	7
IN	317	32	36	MO	417	27	155
IN	574	27	47	MO	573	29	216
IN	765	38	121	MO	636	25	46
IN	812	37	145	MO	660	21	230
KS	316	21	14	MO	816	31	75
KS	620	21	107	MS	228	16	11
KS	785	25	79	MS	601	31	51
KS	913	27	29	MS	662	35	97
KY	270	27	127	MT	406	15	105
KY	502	30	35	NC	252	23	64
KY	606	17	98	NC	336	40	75
KY	859	33	42	NC	704/980	38	52
LA	225	24	34	NC	828	27	68
LA	318	19	73	NC	910	24	64
LA	337	18	48	NC	919	33	36
LA	504	25	8	ND	701	20	69
LA	985	30	46	NE	308	13	178
MA	339/781	33	40	NE	402	24	283
MA	351/978	37	57	NH	603	32	127
MA	413	29	60	NJ	201/551	37	22
MA	508/774	38	85	NJ	609	32	39
MA	617/857	36	20	NJ	732/848	33	36
MD	240/301	50	63	NJ	856	32	32
MD	410/443	43	102	NJ	862/973	39	42

Table 11 (continued)

State	NPA area	Service Providers	Rate Centers
NJ	908	33	38
NM	505	22	57
NV	702	26	16
NV	775	26	46
NY	212/646/917	42	13
NY	315	31	149
NY	347/718/917	40	13
NY	516	36	11
NY	518	28	135
NY	585	25	77
NY	607	22	105
NY	631	34	53
NY	716	27	79
NY	845	43	96
NY	914	39	28
OH	216	23	4
OH	234/330	32	103
OH	419/567	32	163
OH	440	32	62
OH	513	27	25
OH	614	32	16
OH	740	42	159
OH	937	30	112
OK	405	34	80
OK	580	25	96
OK	918	31	113
OR	503	8	7
OR	503/971	32	47
OR	541	35	88
PA	215/267	40	36
PA	412/878	26	23
PA	484/610	49	85
PA	570	32	123
PA	717	34	90
PA	724/878	36	150
PA	814	30	129
PR	787/939	10	86
RI	401	25	25
SC	803	45	68
SC	843	28	69
SC	864	29	58
SD	605	11	75
TN	423	36	64
TN	615	32	49

State	NPA area	Service Providers	Rate Centers
TN	731	19	49
TN	865	22	30
TN	901	23	14
TN	931	29	58
TX	210	26	1
TX	214/469/972	45	43
TX	254	25	60
TX	281/713/832	41	45
TX	325	20	53
TX	361	25	57
TX	409	25	39
TX	430/903	36	127
TX	432	15	20
TX	512	34	33
TX	682/817	39	24
TX	806	18	58
TX	830	29	74
TX	915	22	6
TX	936	18	39
TX	940	37	57
TX	956	21	28
TX	979	23	44
UT	435	25	54
UT	801	23	22
VA	276	29	70
VA	434	23	47
VA	540	33	89
VA	571/703	42	19
VA	757	25	34
VA	804	27	55
VT	802	16	101
WA	206	27	5
WA	253	31	14
WA	360	45	72
WA	425	30	14
WA	509	38	84
WI	262	29	58
WI	414	23	4
WI	608	34	83
WI	715	29	120
WI	920	33	84
WV	304	30	163
WY	307	15	51

Table 12 is a summary of the aggregated total by pool of the service providers participating in the pooled areas since 2002.

Table 12. Aggregated Total by Pool of Service Providers Since 2002

Year	Total Number of Distinct Service Providers	Pooled Areas	Total Number of NPA Areas	Total Number of Jurisdictions
2002	1,159	6,578	158	42
2003	1,631	13,322	237	51
2004	1,608	12,448	239	52
2005	1,745	13,168	241	52

5. Forecast Results and a Review of Forecasts versus Actual Block Activation in the Past

A report identifying forecast results by NPA, as well as a review of forecasts as compared to actual block assignments for the current year and past years, can be found below.

In summary for 2005, there were:

- 241 separate NPA areas;
- 10,435 rate centers with forecasts;
- 197,878 forecasted blocks; and
- 55,990 assigned blocks.

Based upon this information, we have determined that 28.3% 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 number of blocks that were assigned to those same SPs within the same calendar year. Of the 13,168 distinct pooling rate areas, 2,733 had no forecast.

Table 13 illustrates the actual number of blocks assigned compared to the number of blocks forecasted by NPA area for 2005.

Table 13. Forecasted versus Actual Block Assignments by NPA for 2005

NPA	Blocks Assigned	Forecasted Blocks	Percentage
201/551	372	1,147	32.4%
202	243	427	56.9%
203	289	948	30.5%
205	317	962	33.0%
206	190	457	41.6%
207	148	444	33.3%
208	128	783	16.3%
209	333	1,277	26.1%
210	375	679	55.2%
212/646/917	820	5,102	16.1%
213	131	475	27.6%
214/469/972	714	1,514	47.2%
215/267	671	1,804	37.2%
216	89	349	25.5%
217	153	1,108	13.8%
218	63	288	21.9%

NPA	Blocks Assigned	Forecasted Blocks	Percentage
219	126	598	21.1%
224/847	612	1,915	32.0%
225	226	364	62.1%
228	72	193	37.3%
229	79	370	21.4%
231	213	553	38.5%
234/330	313	1,418	22.1%
239	162	412	39.3%
240/301	446	1,611	27.7%
248/947	612	1,464	41.8%
251	138	435	31.7%
252	96	440	21.8%
253	239	632	37.8%
254	132	429	30.8%
256	180	1,034	17.4%
260	80	704	11.4%
262	204	986	20.7%
269	170	671	25.3%
270	151	765	19.7%
276	67	335	20.0%
281/713/832	993	1,705	58.2%
302	161	776	20.7%
303/720	314	816	38.5%
304	162	1,003	16.2%
305	45	141	31.9%
305/786	287	694	41.4%
307	53	230	23.0%
308	11	114	9.6%
309	99	683	14.5%
310	563	1,568	35.9%
312	69	198	34.8%
313	195	616	31.7%
314	207	631	32.8%
315	253	1,212	20.9%
316	104	280	37.1%
317	257	890	28.9%
318	186	533	34.9%
319	42	192	21.9%
320	61	890	6.9%
321	137	334	41.0%
321/407	531	1,036	51.3%
323	477	1,187	40.2%
325	43	218	19.7%
334	152	713	21.3%

Table 13 (continued)

NPA	Blocks Assigned	Forecasted Blocks	Percentage	NPA	Blocks Assigned	Forecasted Blocks	Percentage
336	221	680	32.5%	530	321	1,380	23.3%
337	161	408	39.5%	540	177	811	21.8%
339/781	431	1,294	33.3%	541	168	1,228	13.7%
347/718/917	1054	3,676	28.7%	559	309	1,098	28.1%
351/978	420	1,315	31.9%	561	309	747	41.4%
352	224	810	27.7%	562	270	682	39.6%
360	334	1,071	31.2%	563	31	126	24.6%
361	84	335	25.1%	570	271	934	29.0%
386	158	475	33.3%	571/703	449	1,117	40.2%
401	192	485	39.6%	573	150	942	15.9%
402	94	392	24.0%	574	94	564	16.7%
404/678/770	210	1,023	20.5%	580	89	361	24.7%
405	269	889	30.3%	585	190	742	25.6%
406	43	559	7.7%	586	152	487	31.2%
408	325	853	38.1%	601	171	562	30.4%
409	127	305	41.6%	602	172	295	58.3%
410/443	741	2,409	30.8%	603	246	1,198	20.5%
412/878	132	640	20.6%	605	35	178	19.7%
413	212	781	27.1%	606	83	416	20.0%
414	69	289	23.9%	607	134	507	26.4%
415	267	756	35.3%	608	128	431	29.7%
417	115	510	22.5%	609	249	923	27.0%
419/567	252	1,655	15.2%	612	49	183	26.8%
423	173	2,879	6.0%	614	323	728	44.4%
425	240	634	37.9%	615	285	1,307	21.8%
430/903	212	749	28.3%	616	162	605	26.8%
432	49	167	29.3%	617/857	378	1,290	29.3%
434	72	372	19.4%	618	174	1,298	13.4%
435	71	501	14.2%	619	276	683	40.4%
440	231	841	27.5%	620	80	390	20.5%
478	60	281	21.4%	623	120	240	50.0%
479	67	200	33.5%	626	287	775	37.0%
480	265	457	58.0%	630	446	1,259	35.4%
484/610	624	2,137	29.2%	631	599	1,844	32.5%
501	94	295	31.9%	636	135	669	20.2%
502	222	602	36.9%	641	64	211	30.3%
503	5	67	7.5%	650	209	703	29.7%
503/971	319	925	34.5%	651	129	419	30.8%
504	272	489	55.6%	660	55	277	19.9%
505	136	687	19.8%	661	286	658	43.5%
507	93	626	14.9%	662	184	947	19.4%
508/774	664	2,449	27.1%	678/770	589	3,708	15.9%
509	201	999	20.1%	682/817	349	1,252	27.9%
510	319	913	34.9%	701	17	201	8.5%
512	316	710	44.5%	702	379	661	57.3%
513	144	642	22.4%	704/980	422	1,184	35.6%
515	108	390	27.7%	706	249	998	24.9%
516	324	936	34.6%	707	388	1,157	33.5%
517	218	735	29.7%	708	379	1,403	27.0%
518	260	1,075	24.2%	712	48	177	27.1%
520	188	448	42.0%	714	533	1,405	37.9%

Table 13 (continued)

NPA	Blocks Assigned	Forecasted Blocks	Percentage
715	54	545	9.9%
716	195	854	22.8%
717	367	1,210	30.3%
719	116	472	24.6%
724/878	364	1,808	20.1%
727	281	659	42.6%
731	87	526	16.5%
732/848	423	1,352	31.3%
734	316	1,107	28.5%
740	215	1,502	14.3%
754/954	397	830	47.8%
757	353	892	39.6%
760	541	1,569	34.5%
763	98	289	33.9%
765	221	1,445	15.3%
772	157	380	41.3%
773	446	978	45.6%
775	157	361	43.5%
785	90	606	14.9%
787/939	256	982	26.1%
801	321	1,187	27.0%
802	77	809	9.5%
803	231	802	28.8%
804	238	769	30.9%
805	409	1,338	30.6%
806	89	271	32.8%
808	142	279	50.9%
810	207	643	32.2%
812	210	1,252	16.8%
813	452	885	51.1%
814	212	823	25.8%
815	313	2,008	15.6%
816	197	633	31.1%
818	532	1,408	37.8%
828	97	496	19.6%
830	76	314	24.2%
831	179	520	34.4%
843	157	717	21.9%
845	267	1,328	20.1%
850	241	796	30.3%
856	229	821	27.9%

NPA	Blocks Assigned	Forecasted Blocks	Percentage
858	174	464	37.5%
859	176	617	28.5%
860	254	1,340	19.0%
862/973	520	1,495	34.8%
863	211	625	33.8%
864	259	806	32.1%
865	140	509	27.5%
870	54	263	20.5%
901	116	414	28.0%
904	377	784	48.1%
906	39	118	33.1%
907	13	33	39.4%
908	274	782	35.0%
909	493	1,419	34.7%
910	178	631	28.2%
912	52	302	17.2%
913	136	520	26.2%
914	285	1,537	18.5%
915	169	268	63.1%
916	319	894	35.7%
918	156	768	20.3%
919	336	873	38.5%
920	147	913	16.1%
925	233	857	27.2%
928	137	526	26.0%
931	113	736	15.4%
936	48	212	22.6%
937	193	1,145	16.9%
940	83	238	34.9%
941	210	522	40.2%
949	229	673	34.0%
951	361	1,089	33.1%
952	89	264	33.7%
956	177	475	37.3%
970	147	799	18.4%
979	55	304	18.1%
985	236	529	44.6%
989	161	738	21.8%
Total	55,990	197,878	28.3%

This page left blank intentionally.

6. System and Performance Metrics

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 in any 12-month interval shall be less than nine (9) hours.
4. The mean time to repair (MTTR) for all unscheduled downtime in 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 in any 12-month interval shall be less than 24 hours.

6.1 Pooling Administration System (PAS) Performance

NeuStar PA met or exceeded the system and performance metrics outlined above in 2005.

Of the total of 8,760 hours in 2005, the only PAS unscheduled downtime was for 19 minutes, for an average availability of more than 99.99 percent, far exceeding the requirement of 99.9 percent.

During 2005 NeuStar PA used less than half of the FCC-approved 12 hours of scheduled downtime on August 13 to seamlessly implement an operating system, database, and application upgrade.

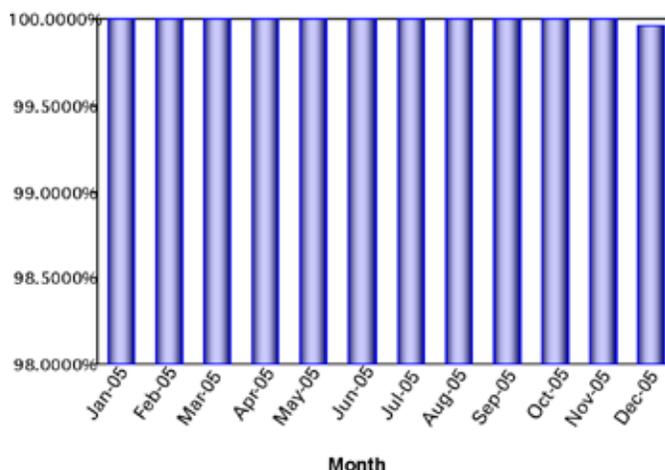
Table 14 and Chart 5 shows a summary of PAS scheduled system performance in 2005.

Table 14. 2005 PAS Scheduled System Performance

Month	Number of Possible Scheduled Available Hours	Number of Hours Available	Scheduled Hours Available
Jan	744	744	100%
Feb	672	672	100%
Mar	744	744	100%
Apr	720	720	100%
May	744	744	100%
Jun	720	720	100%
Jul	744	744	100%
Aug	738 hours, 6 minutes, 38 seconds*	738 hours, 6 minutes, 38 seconds	100%
Sept	720	720	100%
Oct	744	744	100%
Nov	720	720	100%
Dec	744	743 hours, 41 minutes	99.96%

* Number of scheduled available hours is based on the number of hours of FCC-approved scheduled downtime remaining after completion of PAS maintenance on August 13.

Chart 5 - Total PAS Scheduled Availability For 2005 (January 01, 2005 - December 31, 2005) - 99.9 %



6.2 Disaster Recovery Operational and Technical Testing

The PA successfully completed operational and technical disaster recovery testing during the week of May 16. 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 May 20. 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; however 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 annually under separate cover and all transferable property is appropriately labeled with FCC asset tags.

This page left blank intentionally.

8. Industry Issue Identification/Feedback

Our customers often have suggestions for enhancements to the PAS and the PA website that could be beneficial to many or even all users. In 2004, the PA developed an electronic method through the PA website for customers to recommend changes to the PAS that will enhance their use of it. The PA reviews every suggestion quarterly that comes in through the website. In addition, the PA receives PAS improvement suggestions through the NOWG annual performance review and the PA annual survey. Industry issues also surface through the North American Numbering Council (NANC), interaction with the NOWG, and participation in industry forums. This section contains information on industry pooling issues and feedback that was provided to the PA in 2005.

8.1 Issues from the 2005 PA Survey in September 2005

Several suggestions were made through the 2005 PA Annual Survey regarding process enhancements and ways to improve customer service. We reviewed and evaluated all of the suggestions made in the survey responses and then determined the best manner in which the information could be used to enhance our customer service and improve PAS. Some suggestions were for capabilities or reports already present in PAS and we contacted the survey participant to show them how to access the requested information. Other suggestions became the basis for change orders and have been implemented in PAS. (See Section 8.2 for detailed information) The PA also scheduled refresher training sessions for both regulators and service providers based on suggestions for needed education on the navigation of the Pooling website and use of PAS. (See Section 2.1.5 for further information)

Highlights of the survey suggestions are:

- Create a report in PAS to include a timeline for block requests to include, on one page, the dates of the part 1a submit, part 1b, part 3 receive, part 4 and in-service.
- Create a report that will show outstanding part 4s.
- On the Pooling website - The blocks report section would

be more helpful if the user could pull the available blocks report by NPA & rate center, rather than just by NPA.

- Schedule a training course on the PAS and National Pooling websites.
- Request that the notification for block donation be more specific if the donation has been rejected. It was suggested that the PA include the NPA-NXX-X and the reason it was rejected or accepted.
- Suggestion that the system automatically track the status of a request from Part 1 to Part 5 so that the service provider could get a snapshot of where in the process each block is.
- Allow the forecast section of the MTE in PAS to allow negative numbers.
- Have the website provide an explanation (online) of what information the reports provide - both public reports and those obtained through the PAS login.

8.2 Industry-Suggested PAS Improvements

In response to suggestions we received from the industry, we submitted three (3) change orders in 2005:

Change Order 38 was implemented on November 7 and included the following:

- *Ability to Add Additional Contacts to a PAS Profile*
Service providers have the option of adding up to three additional contacts to their user profile which will then enable them to have PAS send the following types of emails to those contacts: Part 3s, Part 4 Reminders, Semi-Annual Forecast Reminder, Completed Part 1B and Rejected Part 1B.
- *Ability to Request Multiple Effective Dates*
Service providers have the ability to request multiple effective dates for the following types of requests: Individual Block Requests, Full NXX Requests on Behalf of the PA, Full NXX Request for a Dedicated Customer, and Full NXX Request to Establish an LRN.

- *Ability to Reset Your Own PAS Password*
PAS users have the ability to reset their password in PAS. PAS will continue to generate the new password.
- *PAS User ID De-Activation Reminder Email Notification*
When there has been no activity in PAS for 110 calendar days, PAS will automatically generate an email notification to users indicating that they will be de-activated if they do not log into PAS within 10 calendar days of receiving this notification. If the user still does not log into PAS after the initial notification, a second and final email notification will be sent three days prior to account deactivation.
- *Block Report*
When viewing the block report, users now have the ability to select a rate center as part of their search criteria in addition to the state and NPA.
- *Modified Processed Donation Email Notification*
The donation emails now include the disposition of the donation in the body of the email e.g. "Your donation of block NPA-NXX-X was (rejected/accepted).
- *Modified OCNs*
OCNs listed anywhere in PAS are now in numerical order.

Change Order 39 was also implemented on November 7 and included the following:

- *Part 4 Report*
The Part 4 Report lists all of the Part 4s that have been submitted via PAS. Users may now query this report by state, NPA, OCN and date range. The report contains the state, NPA-NXX-X, OCN, type of request, rate area, assignment date, effective date, in-service date, Part 4 receipt date and the name of the PAS user who submitted the Part 4.
- *Assignments Needing Part 4 Report*
The Assignments Needing Part 4 Report lists assigned thousands-blocks that have no Part 4 on file. Users may now query this report by state, NPA, OCN, and date range. The report contains the state, NPA-NXX-X, OCN, type of request, rate area, assignment date, effective date and Part 4 due date.

Change Order 45 includes the following suggestions from 2004 NOWG performance review and was submitted on December 28. This Change Order is pending approval by the FCC.

- Request 1: Modify the pooling website to allow existing reports to be downloaded in Excel format.
- Request 2: Add a part 1B form for block transfers. The block transfer request in PAS today does not provide a Part 1B form for the user to complete with their application. Users are required to manually complete and send a Part 1B to the PA via email or fax.
- Request 3: Enable users to download the PAS application forms (Part 1A, Part 1B, Part 3, MTE, etc.) to PDF or other similar document formats. This will allow users to save the forms on their own systems.
- Request 4: Add a feature in PAS that will allow the previously entered information to be retained in PAS when there is an error on the form. Currently, when users enter data into a request in PAS and they make an error that causes an error message to be generated (e.g. leaving a required field blank), PAS clears several fields that were previously entered.

8.3 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, as needed, is able to quickly identify the appropriate person to whom to escalate issues;
- 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 2005, the CSR received approximately 6,000 calls from our customers. Twenty-seven trouble tickets were submitted to the Help Desk on items such as pooling process-related questions, website navigation, and PAS errors.

8.4 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 2005, reporting on the status of thousands-block pooling administration and events affecting the performance of the PA. In 2005, the PA received one ongoing action item from the NANC, to provide updates on the hurricane disaster relief activities of the PA. The last requests supporting hurricane disaster relief efforts were made November 21, 2005. Further detail about the PA's hurricane disaster relief activity can be found in Section 2.1.6.

The PA also participated in four (4) NANC Issue Management Groups (IMGs): Safety Valve, NANC Training Manual, Future of Numbering (FON) and p-ANI. The following describes the IMGs and PA participation:

NANC Safety Valve IMG

The NANC formed the Safety Valve IMG to evaluate the safety valve process and to determine if there should be any changes to it. The PA participated and provided information regarding PA procedures for the safety valve process to this working group. The IMG provided a final report and recommendation to the NANC on March 15, 2005. The IMG addressed the following issues: 1) raise awareness 2) develop a quick sheet 3) propose an action clock 4) offer a state regulatory opt-out and 5) develop a designated entity review of pre-defined criteria. A copy of the entire report is located at http://www.nanc-chair.org/docs/nowg/Mar05_Safety_Valve_IMG_Report.doc.

Future of Numbering (FON)

The NANC formed the Future of Numbering Working group (FON) in December 2004. The mission of this IMG is to investigate new telephone numbering assignment approaches and future telephone number assignment requirements. This IMG identifies common criteria and gathers data to identify trends and their impact upon numbering resources. If necessary, it will analyze those trends and requirements to determine the feasibility and benefit of each, and report its findings to the NANC. The working group analyzes various issues and assignments from the NANC and/or the FCC.

The FON addressed many issues in 2005, including the Department of Navy (DoN) request for its own area code, VoIP service providers' access requirements for NANP resource assignments, NANC Change Orders 399 & 400, and p-ANI Administration.

The PA participated in the FON issue management groups by providing input as needed on the variety of topics.

p-ANI – ESQK Administration

On June 3, 2005 the FCC issued its First Report and Order (FCC docket 05-196) mandating that providers of VoIP services supply enhanced 9-1-1 (E9-1-1). The industry implementation of this requirement involves the use of a type of pseudo Automatic Number Identification (pANI), Emergency Services Query Keys (ESQKs). The Emergency Service Interconnection Forum (ESIF) Committee H had worked on guidelines for the administrator of ESQKs, and submitted "Routing Number Authority (RNA) for pANIs Used for Routing Emergency Calls -- pANI Assignment Guidelines and Procedures"¹ to the NANC on July 25, 2005. Shortly thereafter, the FON established the pANI Issue Management Group (IMG) to develop interim guidelines for the proposed administrator of ESQKs, and provide a recommendation on them to the NANC.

The pANI IMG made several changes to the interim p-ANI guidelines for ESQK Administration. In addition, it recommended to the NANC that the PA be named the Interim ESQK administrator and follow the interim guidelines that the IMG established, which can be found at http://www.nanc-chair.org/docs/nowg/0905_-_pANI_Guidelines.doc. The NANC forwarded the IMG recommendation to the FCC on September 8.

The IMG tasked the PA with canvassing the stakeholders to determine which, if any, resources from the 211 NXX had already been assigned to either wireless or VoIP providers, and to ascertain where the services of the Interim Administrator would be required. The PA, in order to be ready to proceed with ESQK administration as promptly as possible if and when it was appointed to the interim position, contacted those entities that presently assign p-ANIs, and compiled a list of assigned p-ANIs out of the 211 NXXs. Additionally, the PA initiated development of a GUI and a database to facilitate ESQK administration.

The FCC has not acted on the IMG recommendation. The p-ANI IMG continues to meet, refining the process and developing the permanent p-ANI guidelines. The PA participates in this IMG and provides information to the group and ensures that what is being proposed is language that would be clear to an administrator.

¹ © 2005 by Alliance for Telecommunications Industry Solutions) created by the Emergency Services Interconnection Forum (ESIF).

8.5 Industry Numbering Committee (INC) Issues

The Industry Interface Representative represented the PA at the following industry forums in 2005: 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). The Regional Director-External Relations represented the PA at the Local Number Portability Working Group (LNPA WG). As the national PA, our participation at these industry forums includes:

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

In 2005, the PA continued to work with the NRRIC on Issue 0253, Substantive Updates to Network Interconnection Interoperability Forum, NIIF 0015, Intercompany Responsibilities Within the Telecommunications Industry document, and Issue 0264, Update the NIIF Mergers and Acquisitions Document. In addition, the PA submitted ten (10) new issues and fourteen (14) new contributions to INC.

Table 15 depicts a list of new issues and contributions submitted to INC by the PA in 2005:

Table 15. 2005 PA INC Issues & Contributions

INC Meeting	Issue/ Contribution Number	Issue/Contribution Title
INC 80	Issue 464:	Update Pool Indicator Footnote on CO Code Part 1 Form
	Contribution DMM-154:	Amend CO Code Part 1 Footnote 11
INC 81	Issue N/A:	Updates to Ongoing Administration of Allocated Blocks
	Contribution N/A:	Updates to Section 8.5.3 of the TBPAG (Instead of accepting this issue and contribution, an Administrative Action item was assigned to ATIS make the corrections to the TBPAG as outlined in Proposed Contribution 3: Updates to Section 8.5.3 of the TBPAG.)

INC Meeting	Issue/ Contribution Number	Issue/Contribution Title
INC 81	Issue 468:	Remove TBPAG Appendix 7 and Modify COCAG Appendix C For Pooled NXX Returns
	Contribution CO/NXX-318:	Remove TBPAG Appendix 7 and Modify COCAG Appendix C For Pooled NXX Returns
INC 81	Issue 471:	Changes to COCAG, Section 4.1 and TBPAG, Section 8.2
	Contribution DMM-158:	Edits to COCAG 4.1.4.1, 4.1.4, and TBPAG 8.2
INC 82	Issue 475:	Update Appendix 1: Thousands-Block Forecast Report Directions
	Contribution LNPA-502:	Amend Appendix 1 Directions
INC 82	Issue 476:	Part 4 Forms for Non-Pooled and Pooled Codes
	Contribution DMM-160:	Clarifying which Numbering Administrator an SP Will Submit a Part 4 Form To
INC 82	Contribution CO/NXX-322	Address Issues with Available Blocks when Performing a LERG Assignee Transfer Due to a Pooled NXX Return
INC 82	Issue 477:	NPAC Block Effective Dates for Activations, Modifications, and Disconnects
	Contribution LNPA-503:	NPAC Block Effective Dates for Activations, Modifications, and Disconnects
INC 83	Issue 478:	Update INC Procedural Agreements Reached (PAR) Document - PA Change Order Process
	Contribution DMM-164:	Edits to PAR Document
INC 83	Issue 481:	Change Pooling Indicator on Dedicated Non-Pooled Code
	Contribution CO/NXX-328	Edits to COCAG Section 3.1 and TBPAG Section 3.2
INC 83	Contribution CO/NXX-324	Edits to COCAG Appendix C Working Document
INC 84	Issue 486	Contaminated or Pristine Assigned Block Returns
	Contribution LNPA-510:	Edits to Part 1A and Section 9.0 of the TBPAG for Contaminated or Pristine Assigned Block Returns
INC 84	Contribution CO/NXX-330:	Edits to Appendix C Working Document as a Result of GS-491
INC 84	Contribution LNPA-503R1	Update the TBPAG for NPAC Block Effective Dates

8.6 Working With the Numbering Oversight Working Group (NOWG)

The Numbering Oversight Working Group (NOWG) was designated by the FCC, to review PA Change Orders and provide a recommendation for their disposition to the FCC, and to complete the annual performance review of the PA. The Regional Director- External Relations acts as the liaison between the PA and the NOWG, responding to pooling-related questions as they arise and providing an explanation or clarification of PA change orders during the NOWG review process. The entire PA management team participates in the annual performance review process.

In 2005, the NOWG reviewed the PA performance for calendar year 2004. The performance review of the PA included reviews of:

- A summary of significant PA accomplishments during the 2004 performance year,
- Operations of the various groups within the team,
- Change orders,
- NANC reports, and
- Interactions between the PA and industry.

The PA received a “More than Met” 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, written comments, change orders, reports to the NANC and PA interaction with the NOWG.

In the course of the 2004 PA annual review, the NOWG made six (6) suggestions for continuous improvement of pooling administration that the PA should consider. Although the FCC did not direct the PA to implement the recommendations of the NOWG, the PA proactively implemented some of them.

Table 16. NOWG Suggestions for PA Improvements

NOWG Suggestion	PA Improvement
Development, review and distribution of the Annual Report.	The PA made the 2004 Annual Report available on its website and the NOWG will be able to review the annual report in 2005 prior to final production.
Training to increase staff knowledge of industry guidelines.	Whenever the guidelines are re-issued, the staff is trained on the new items in the guidelines.

NOWG Suggestion	PA Improvement
Ongoing focus to improve the accuracy of the data that is input into PAS.	We consistently review the rate center files and review carrier-related information in database.
Consider a PAS capability that will allow a pass-through to the NANPA system for full NXX requests (pool replenishment, dedicated customer or LRN establishment)	This suggestion will require change orders from both the PA and the NANPA and has also been added to the draft Technical Requirements for the new PA contract.
Change the PAS timeout function more than 15 minutes.	The PA changed the PAS timeout function from 15 to 20 minutes in response to a suggestion from the 2004 NOWG performance evaluation.
Conduct a continual review of the information on the main web 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 released January 2005. PA staff reviews the website on a continual basis and at their staff meetings to ensure that the information is kept current.

The NOWG also provides recommendations to the FCC on PA change orders. The NOWG made seven (7) recommendations on PA change orders to the FCC in 2005. The NOWG recommended approval of six (6) and denial of one (1).

In November 2005, the PA provided input and made recommendations on the NOWG survey for the 2005 PA performance to be distributed in January 2006.

8.7 Formal 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 2005, NeuStar, as national PA, responded to one formal industry complaint that was sent to the FCC:

On March 29, the PA received an email regarding a block that was donated in 2002, and remained available in PAS until March 2005, when it was assigned to another carrier. Because the donating carrier had customers on the block, those customers were put out of service. The PA responded to the FCC and the complainant on the results of the investigation on April 8. No further action was taken or deemed necessary.

8.8 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. Topics for the Tip are generated from issues raised and suggestions received from regulators and service providers, INC action items and internal intelligence, when processes need to be clarified. The Tip is sent via email to the PAS distribution list on the first business day of each month. The Tip 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 17. 2005 Tip of the Month

Month	Topic
January	Outlines the Thousands-Block Forecast Report (Appendix 1) time frames per section 6.0 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (TBPAG).
February	Describes what action a PAS user should take after receiving an email regarding their thousands-block donation submission.
March	Reminds carriers' that evidence of certification and evidence documenting their readiness to provide service must be submitted the same day the initial request is submitted in PAS.
April	Outlines the thousands-block donation process per section 7.2.7 of the TBPAG.
May	Describes what the acceptable thousands-block contamination level is for thousands-block donations.
June	Reminds carriers' of their Part 4 obligations.
July	Describes when a PAS User ID password will expire, how to obtain a new PAS password and how to reactivate a disabled PAS account.
August	Reminds carriers' to create the NXD-A record in the Telcordia™ Business Integrated Rating and Routing Database System (BIRRDs) for pooled NXX assignments.
September	Outlines the LERG assignees responsibilities for newly acquired pooled NXXs per section 7.5.3 and 7.5.4 of the TBPAG.
October	Reminds consultants that they must have a letter of authorization (LOA) on file for each service provider on whose behalf they intend to submit pooling requests for.
November	Describes a list of helpful tips provided by the NPAC.
December	Outlines the LERG assignee responsibilities per section 4.2 of the TBPAG.

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 (*Section 10.1*) and the total number of reports sent to NANC, NANPA and service providers (*Section 10.2*).

Table 18. Total number of reports produced for FCC and state regulatory agencies

Regulatory agency	Total number of reports
FCC	57
State regulators	2,449*

* The substantial increase from 2004 is due to the daily activity reports sent to 10 states at their request during 2005.

Table 19. Total number of reports produced for NANC, NANPA, and service providers

Group	Total number of reports
NANC	6
NANPA	39
Service providers	21

This page left blank intentionally.

10. Additional Information Offerings

When NeuStar began administering pooling trials in 1998, nearly every NPA was experiencing acceleration in exhaust dates. On September 30, 1999, there were 73 NPAs in jeopardy. Today there are 28 NPAs in a jeopardy status and only one (1) of those, Georgia 706, has been declared in jeopardy since the rollout of national thousands block number pooling.

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 25,557 NXX codes have been saved by pooling, which is the equivalent of 31.9 NPAs. (See Section 10.1 below for further details)

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, new service offerings, modifications to the rate center designations as a result of OMB changes to the MSA lists, and regulatory enforcement.

10.1 NXXs Saved by Pooling

Table 20 details the 25,557 NXX codes that have been saved through number pooling in 50 states and the District of Columbia and Puerto Rico. NXX codes were saved in all but one pooled NPA area – Alaska 907.

Table 20. NXXs Saved from Pooling

NPA Area	Total of NXXs Saved
201/551	198
202	14
203	167
205	76
206	16
207	160
208	62
209	195
210	8
212/646/917	267
213	35
214/469/972	116
215/267	229
216	19
217	161
218	28
219	107
224/847	466
225	38
228	16
229	49
231	192
234/330	130
239	74
240/301	310
248/947	178
251	28
252	69
253	51
254	25
256	73
260	65
262	114
269	195
270	94
276	58

Table 20 (continued)

NPA Area	Total of NXXs Saved
281/713/832	139
302	82
303/720	56
304	177
305	15
305/786	58
307	34
308	13
309	79
310	224
312	13
313	51
314	33
315	152
316	15
210	8
212/646/917	267
213	35
214/469/972	116
215/267	229
216	19
217	161
218	28
219	107
224/847	466
225	38
228	16
229	49
231	192
234/330	130
239	74
240/301	310
248/947	178
251	28
252	69
253	51
254	25
256	73
260	65
262	114
269	195
270	94
276	58
281/713/832	139
302	82

NPA Area	Total of NXXs Saved
303/720	56
304	177
305	15
305/786	58
307	34
308	13
309	79
310	224
312	13
313	51
314	33
315	152
316	15
317	122
318	41
319	17
320	32
321	41
321/407	129
323	122
325	13
334	52
336	106
337	40
339/781	266
347/718/917	192
351/978	323
352	106
360	178
361	30
386	79
401	105
402	34
404/678/770	16
405	136
406	56
408	87
409	48
410/443	538
412/878	142
413	216
414	20
415	76
417	50

Table 20 (continued)

NPA Area	Total of NXXs Saved
419/567	118
423	82
425	51
430/903	65
432	18
434	64
435	56
440	112
478	31
479	22
480	6
484/610	416
501	31
502	41
503	10
503/971	72
504	25
505	91
507	73
508/774	586
509	111
510	89
512	82
513	43
515	22
516	130
517	104
518	172
520	39
530	237
540	135
541	138
559	134
561	102
562	76
563	12
570	161
571/703	126
573	219
574	62
580	60
585	115
586	98
601	51

NPA Area	Total of NXXs Saved
602	8
603	497
605	6
606	32
607	55
608	61
609	251
612	10
614	82
615	79
616	159
617/857	198
618	325
619	74
620	45
623	6
626	88
630	237
631	357
636	80
641	34
650	77
651	27
660	44
661	90
662	111
678/770	180
682/817	77
701	7
702	29
704/980	194
706	104
707	178
708	266
712	18
714	169
715	31
716	152
717	172
719	28
724/878	289
727	55
731	60
732/848	322

Table 20 (continued)

NPA Area	Total of NXXs Saved
734	179
740	129
754/954	72
757	108
760	280
763	14
765	114
772	83
773	123
775	57
785	50
787/939	17
801	125
802	89
803	92
804	106
805	220
806	14
808	19
810	153
812	74
813	84
814	120
815	299
816	82
818	175
828	56
830	34
831	72
843	78
845	268
850	78
856	199
858	63
859	31
860	187
862/973	346
863	80
864	154
865	53
870	46
901	23
904	85
906	35

NPA Area	Total of NXXs Saved
907	0
908	151
909	204
910	102
912	40
913	33
914	180
915	17
916	102
918	87
919	141
920	83
925	100
928	55
931	76
936	15
937	118
940	40
941	98
949	67
951	199
952	20
956	64
970	77
979	34
985	82
989	117
Totals	25,557

10.2 Regulatory Activity

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 3.0, of the 18,658 pooling rate centers, 11,824 are designated as Optional (O) or Excluded (X): of these, 6,335 are designated as O and 5,489 are X.

In 2005, five (5) states followed the 2004 petitions filed by the states of Oklahoma, West Virginia, and Nebraska by filing petitions for delegated authority to implement additional thousands block number pooling outside mandatory pooling areas. No action was taken by the FCC on any of these petitions in 2005.

Table 21 is a summary of all petitions filed by states for additional pooling authority:

Table 21. Petitions for Additional Pooling Authority

State	Date Filed	Released for Comment
Oklahoma	10/14/04	10/28/04
West Virginia	11/2/04	11/30/04
Nebraska	11/23/04	11/30/04
Missouri	3/23/05	5/4/05
Michigan	4/7/05	5/4/05
Ohio	8/17/05	12/21/05
New York	8/25/05	11/28/05
Washington	12/14/05	01/03/06

10.3 Trends in Thousands Block Number Pooling

Table 22 contains pooling statistics since 2002 and illustrates percent change in activity between 2002 and 2005.

Table 22. Pooling Growth Chart

	2002	2003	2004	2005
CO Codes Opened for LRNs	206	475	787	945
CO Codes Opened for Dedicated Customers	37	98	258	135
CO Codes Opened for Pool Replenishment	194	240	933	1,305
Blocks Assigned by PA During Year	8,102	21,650	37,403	55,990
Assigned Blocks at Year End	10,023	29,027	61,118	109,420
Applications Processed	15,148	43,473	69,193	102,304

10.3.2 Total Applications Processed Since 2002

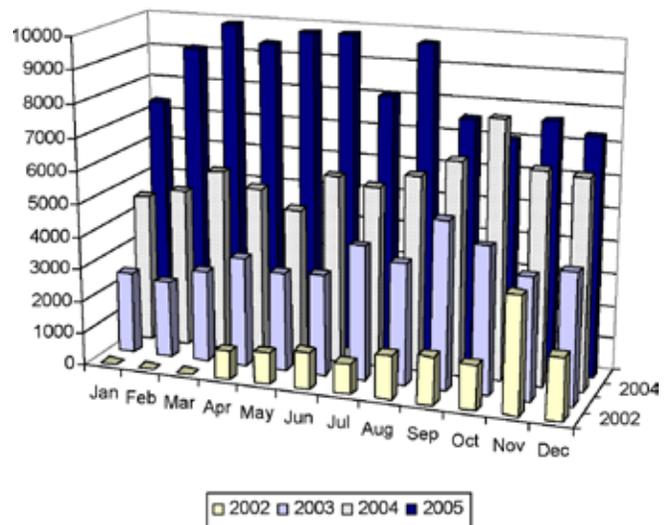
The total number of applications processed is a measure of the actual work performed by the pooling administrators, because not every application results in an immediate assignment of a thousands-block. Although a large majority of applications for numbering resources are processed and approved immediately,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

Table 23 contains the total quantities of applications reported as processed by month since national pooling began in March 2002, and Chart 6 illustrates the number of applications processed by year.

Table 23. Total Applications Processed Since 2002

Month	2002	2003	2004	2005
Jan	N/A	2678	4,574	7,324
Feb	N/A	2,553	4,858	9,062
Mar	122	3,225	5,548	9,878
Apr	646	3,636	5,160	9,363
May	910	3,289	4,625	9,776
Jun	1,252	3,078	5,742	9,792
Jul	1,206	4,072	5,498	8,022
Aug	1,630	3,689	6,007	9,666
Sep	1,623	5,144	6,587	7,520
Oct	1,734	4,444	7,808	6,970
Nov	3,897	3,680	6,439	7,648
Dec	2,128	3,985	6,347	7,283
TOTAL	15,148	43,473	69,193	102,304

Chart 6 - PA Applications by Year



10.3.3 Cumulative Thousands Blocks Assigned Since 1998

Chart 7 depicts the cumulative numbers of total blocks assigned since pooling began in Illinois in June 1998.

Chart 7 - Cumulative Thousands Blocks Assigned Since 1998

