

National Pooling  
Administration

2008

Annual  
Report

March 31, 2009

Mr. Anthony S. Wimbush  
Contracting Officer  
FCC Contracts and Purchasing Center  
445 12th Street S.W.  
Washington, D.C. 20554  
RE: Contract Number CON07000005

Dear Mr. Wimbush:

Attached please find the *Thousands-Block Pooling Administration 2008 Annual Report*, submitted pursuant to Contract Data Requirements List referenced in Section 4.6.1 of the *Contract for Pooling Administration Services for the Federal Communications Commission*, FCC Contract No. CON07000005 (Contract). This report covers Pooling Administration (PA) activities from January 1, 2008 through December 31, 2008, and is required by Clause C.1 of the Contract. Section 4, *Contract Data Requirements List*, specifically Section 4.6.1, *Annual*, directs that this report contain:

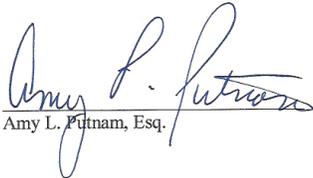
- A brief description of the PA,
- Highlights/significant milestones reached during previous year,
- Identification of existing and potential pooling areas,
- Aggregated total by pool of the service providers participating in the pooled area,
- Forecast results, as well as a review of past forecasts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

The year 2008 was marked by extraordinary levels of customer service and the successful implementation of the enhanced Pooling Administration System (PAS). The annual report sets out how the entire PA team contributed to the overall effectiveness of the PA operation, with nearly flawless PAS performance, timely and accurate customer request processing, and our unparalleled customer support.

During the past year we continued to accurately and efficiently manage thousands-block number pooling services in a neutral manner pursuant to our contractual obligations, justifying the confidence that the FCC and industry have placed in us. As we have since 2001, we will continue to work cooperatively and productively with you, service providers, industry groups, and regulatory staff throughout our contract term.

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

Respectfully submitted,



Amy L. Putnam, Esq.

Sr. Director, Pooling Administration  
NeuStar, Inc.

Cc: Ann Stevens, Esq., FCC  
Marilyn Jones, Esq., FCC  
Gary Remondino, COTR, FCC  
Michael O'Connor, NeuStar



## Table of Contents

<b>Table of Figures .....</b>	<b>5</b>
<b>Section 1 - Description of NeuStar Pooling Administration .....</b>	<b>6</b>
1.1 Background .....	6
1.2 Neutrality .....	6
1.3 Description of National Pooling Administration (PA) .....	7
1.4 NeuStar Pooling Administration 2008 Organization Chart.....	8
<b>Section 2 - 2008 NeuStar Pooling Administration Highlights and Significant Milestones.....</b>	<b>9</b>
2.1 Pooling Administration Contract .....	10
2.1.1. Personnel .....	10
2.1.2 State-of-the-Art Pooling Administration System (PAS) .....	11
2.2 Pooling Administration Services Center (PASC), Concord CA.....	17
2.2.1 Pooling Administration Productivity for 2008 .....	17
2.2.2 Pool Replenishment .....	22
2.2.3 Reclamation .....	25
2.3 Pooling Administration System (PAS) .....	27
2.3.1 PAS Performance .....	27
2.3.2 Pooling Administration System (PAS) Change Orders/Improvements.....	27
2.3.2.1 Change Orders Submitted by the PA in 2008 .....	27
2.3.4 PAS and Website Overview Sessions .....	30
2.3.5 Help Desk and Trouble Tickets.....	31
2.3.5.1 Help Desk .....	31
2.3.5.2 Trouble Tickets.....	32
2.4 Pooling Implementation Management .....	34
2.4.1 Rate Area File Quality Control and Maintenance .....	34
2.4.2 Rate Area File Changes .....	36
2.4.3 Supplemental Implementation Meetings (SIMs).....	37
2.4.4 NRUF/Semi-Annual Forecast Report.....	38



2.5 Regulatory and Compliance .....	38
2.5.1 Regulatory Update Conference Calls .....	38
2.5.2 Educational Sessions .....	39
2.5.3 Debt Collection Improvement Act of 1996, FCC 04-72, MD Docket 02-339, adopted March 25, 2004 (Red Light Rule).....	39
2.5.4 Reporting Compliance.....	39
2.5.4.1 Contract Data Requirements List (CDRL) – Plans.....	39
2.5.4.2 Contract Data Requirements List (CDRL) – Recurring Reports .....	40
2.5.4.3 Other Required Reports.....	41
2.6 Interim RNA Administration (p-ANI).....	42
2.7 2008 PA Survey .....	42
<b>Section 3 - Identification of Existing and Potential Pooling Areas.....</b>	<b>47</b>
3.1 Identification of Existing Pooling Areas .....	47
3.2 Identification of Potential Pooling Areas.....	48
3.3 Summary of Existing and Potential Pooling Areas.....	49
<b>Section 4 - Aggregated Total by Pool of the Service Providers Participating in the Pooled Area     .....</b>	<b>53</b>
<b>Section 5 - Forecast Results and a Review of Forecasts versus Actual Block Activation in the     Past.....</b>	<b>57</b>
5.1 Forecasted Versus Actual Block Assignments by NPA for 2008 .....	57
5.2 NPAs/States with Forecasted-Versus-Actual Blocks Assigned under 20%.....	60
5.3 NPA/States with Forecasted Versus Actual Blocks Assigned Above 50% .....	61
5.4. Analysis of Forecasted Versus Actual Blocks Assigned Percentage Since 2004 .....	61
<b>Section 6 - System and Performance Metrics .....</b>	<b>63</b>
6.1 Pooling Administration System (PAS) Performance in 2008 .....	63
6.2 PAS Performance Metrics .....	65
<b>Section 7 - Status of Required Transferable Property .....</b>	<b>66</b>
<b>Section 8 - Industry Issue Identification/Feedback .....</b>	<b>67</b>
8.1 North American Numbering Council (NANC).....	67
8.1.1 Future of Numbering (FoN) Working Group.....	67



8.2 Industry Forums .....	67
8.3 Working with the Numbering Oversight Working Group (NOWG) .....	73
8.4 Formal Complaints .....	75
8.5 Tip of the Month .....	75
<b>Section 9 - Volume of Reports Produced in 2008 - Aggregated by Regulatory Agency, NANC, NANPA and Service Providers .....</b>	<b>77</b>
9.1 Total Number of Non-Standard Reports Produced for FCC and State Regulatory Agencies .....	77
9.2 Total Number of Non-Standard Reports Produced for NANC, NANPA and Service Providers .....	77
<b>Section 10 - Trends in Pooling Since 2002 .....</b>	<b>78</b>
10.1 NXXs Saved by Pooling .....	78
10.2 Trends in Thousands-Block Number Pooling .....	82
10.2.1 Statistics .....	82
10.2.2 Total Applications Processed (Part 3s) from 2002 through 2008 .....	86
10.2.3 Cumulative Thousands Blocks Assigned Since 2002 .....	88
10.3 Trends in Thousands-Block Pooling By State and NPA Since 2002 .....	88
10.4. Summary of Pooled Areas since 2002 .....	90
10.4.1 Aggregated Pooled Areas from 2002 through 2008 .....	90
10.4.2 Total Pooling versus Total Excluded Rate Areas from 2002 through 2008 .....	91
10.4.3 Total Number of Distinct Pooling Service Providers from 2002 through 2008 .....	92



## Table of Figures

Figure 1: Cumulative Blocks Assigned in 2008.....	19
Figure 2: Blocks Assigned in 2008 by Month .....	20
Figure 3: Overview of All Applications Processed by Status.....	21
Figure 4: Comparison of 2008 PAS Availability with the Contract Requirement .....	64
Figure 5: CO Codes Opened for LRNs fro m2002 through 2008.....	83
Figure 6: CO Codes Opened for Dedicated Customers from 2002 through 2008 .....	83
Figure 7: CO Codes Opened for Pool Replenishment from 2002 through 2008 .....	84
Figure 8: Blocks Assigned During Years 2002 through 2008 .....	84
Figure 9: Assigned Blocks in PAS at the End of Years 2002 through 2008 .....	85
Figure 10: Applications (Part 3s) Processed from 2002 through 2008.....	85
Figure 11: Total Applications Processed by Month from 2002 through 2008 .....	87
Figure 12: Cumulative Thousands Blocks Assigned Since March 2002 .....	88
Figure 13: Total Pooling versus Total Excluded Rate Areas from 2002 through 2008 .....	91
Figure 14: Total Number of Distinct Pooling Service Providers from 2002 through 2008 .....	92



## Section 1 - Description of NeuStar Pooling Administration

### 1.1 Background

In 1997, the Illinois Commerce Commission selected NeuStar, Inc. [then an autonomous business unit known as Communications Industry Services (CIS) within Lockheed Martin Corporation] to administer the trial of thousands-block number pooling 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 Illinois 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. As more states requested and received delegated authority to implement thousands-block pooling trials, NeuStar was chosen as administrator in all but six states where trials were ordered. By the beginning of national pooling, in March, 2002, NeuStar was managing twenty-two state pooling trials in eighty-three NPAs and transitioned over five thousand blocks to our then-newly-designed Pooling Administration System (PAS).

NeuStar competitively bid for and was awarded the first federal contract to administer the national rollout and ongoing administration of thousands-block pooling on

June 15, 2001, for a total of five years, renewable annually. Contract number CON01000016 expired on June 14, 2006. By the end of that contract NeuStar was managing nearly 14,000 rate area pools in all fifty states, the District of Columbia and Puerto Rico.

The FCC issued eight contract modifications between June 15, 2006 and July 12, 2007 to extend NeuStar's pooling administration contract through August 14, 2007. NeuStar again competitively bid for and was awarded the second national pooling contract on July 31, 2007, for a possible total of five years, with a base period of two years and renewable annually for the remaining three. Contract number CON07000005 became effective on August 15, 2007.

### 1.2 Neutrality

NeuStar Pooling Administration (PA) is an independent, neutral third party, as defined in Section H.3.B, Conflict of Interest and Neutrality Requirements, of the Performance Work Statement/Technical Requirements (PWS). As such, the PA is responsible for the fair and efficient overall administration of pooled numbering resources. The PA is a non-governmental entity that is impartial and not aligned with any particular telecommunication industry segment, and complies with 47 C.F.R. § 52.12.

NeuStar Neutrality Compliance Procedures require NeuStar to conduct neutrality refresher training in the first quarter of each year. All NeuStar Board members, designated contractors, and all employees, including



pooling employees, must participate in a training session.

NeuStar is subject to a number of neutrality audits that are performed on a quarterly and semi-annual basis. In connection with these audits, all of its employees, including pooling employees, its directors, and its officers, must sign a neutrality certification stating that they are familiar with the neutrality requirements and have not violated them. Failure to comply with applicable neutrality requirements could result in government fines, corrective measures, curtailment of contracts, or even contract revocation. PA compliance with the FCC's neutrality rules is ensured by the NeuStar Neutrality Officer John Manning, and the FCC.

### ***1.3 Description of National Pooling Administration (PA)***

The PA performs the day-to-day number resource assignment and administrative activities with a long-term focus, which includes maintaining a system to support all day-to-day and long-term pooling functions.

As such, the PA:

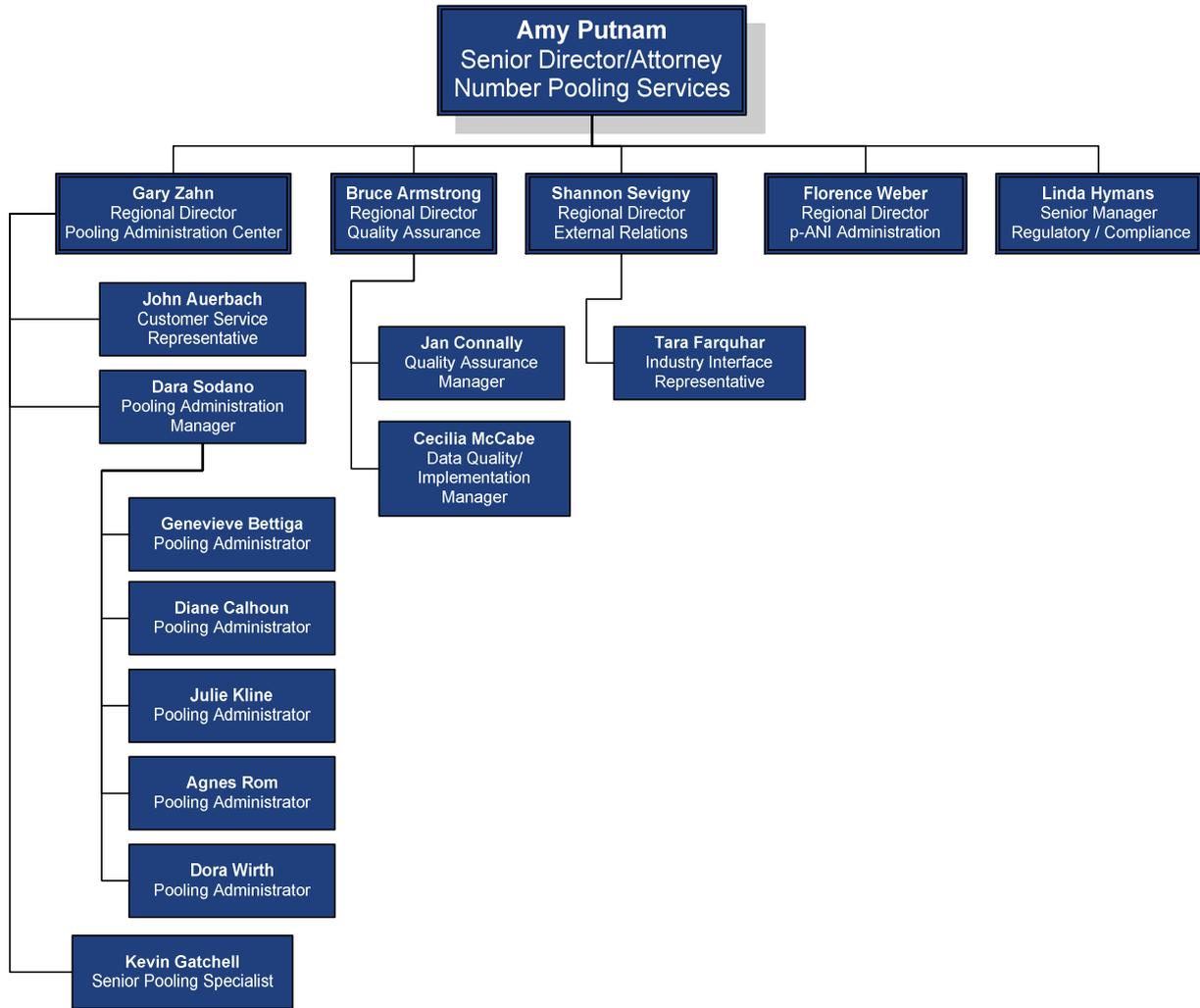
- Provides a standardized application of all administrative pooling guidelines,
- Develops tools and implements a system containing both hardware and software to facilitate the assignment, tracking, and data reporting requirements,
- Maintains interfaces with the NANPA, NPAC, service providers, industry forums, (e.g., INC, NRRIC, etc.) and regulatory agencies, and
- Maintains and plans for adequate pool inventory numbering resources.

The PA also interacts with the NANPA and the NPAC vendor, while impartially administering thousands-block number pools by assigning, managing, forecasting, reporting, and processing data that allows service providers in rate areas designated for thousands-block number pooling to receive telephone numbers in blocks of 1,000. In addition, we maintain adequate pool inventory and accurate rate area designations.

For further information on the PA requirements, see Clause C.1 of the CONTRACT FOR POOLING ADMINISTRATION SERVICES FOR THE FEDERAL COMMUNICATIONS COMMISSION, FCC Contract No. CON07000005.



**1.4 NeuStar Pooling Administration 2008 Organization Chart**





## Section 2 - 2008 NeuStar Pooling Administration Highlights and Significant Milestones

The NeuStar Pooling Administration (PA) goals and objectives for 2008 were:

1. Development, testing, and successful implementation of the enhanced Pooling Administration System (PAS);
2. Exceptional customer support;
3. Zero formal complaints;
4. Continuous monitoring and reviewing of data to assure accuracy;
5. Meet or exceed all contractual requirements.



As you will see throughout this annual report, the PA continued its standard of outstanding performance in its execution of the national pooling contract and met or exceeded all of its goals and objectives in 2008. We begin with highlights of the Pooling Administrator’s 2008 performance and then follow with the detailed descriptions.

**PA Productivity at a Glance (For details, see Section 2.2.)**

ACTIVITY	2008 TOTAL
Applications processed (Part 3s):	108,835
Applications not processed in 7 calendar days:	ZERO
Blocks assigned:	47,898
Change requests to existing blocks or codes:	42,790
Disconnects processed:	9,894
Withdrawals:	1,317
Block or code requests denied:	5,050
Donations processed:	6,583
Central Office Codes opened:	2,571

ACTIVITY	2008 TOTAL
Red Light Rule Denials:	229
Total Reclaimed Blocks:	117

### New Pooling Administration System (PAS) System

On February 9, 2008, the state-of-the art, enhanced Pooling Administration System (PAS) was made available to the public after over 8,000 hours of development, testing and implementation (for details, see Section 2.1.2.). Data migration from the 7-year old original PAS to the new system took place in less than 24 hours from Friday evening, February 8, to Saturday evening, February 9, when the complete database transfer occurred.



## Pooling Administration System (PAS)

PAS again exceeded the requirement of 99.9% scheduled availability, providing 99.998% availability. (For details, see Section 6.0)

The total number of assigned blocks in the Pooling Administration System (PAS) as of December 31, 2008 was 229,336.

## Comprehensive and timely reporting

We produced 2,114 reports for the FCC, state regulatory agencies, the North American Numbering Council (NANC), NANPA, and service providers during the reporting period. (For details see Section 9.0.)

## Industry support and customer focus

In 2008, the PA attended all Industry Numbering Committee (INC) meetings, submitting numerous issues and contributions. The PA also participated in meetings of the Network Routing Resources Information Committee (NRRIC), the Common Interest Group on Routing and Rating (CIGRR), Local Number Portability Administration (LNPA) Working Group, the Emergency Services Interconnection Forum (ESIF), and the Future of Numbering (FoN) Working Group, and attended the one 2008 NANC meeting (For details see Section 8.0)

Data Quality and Implementation Management continued the quality control and maintenance of the pooling area files that are so critical to service providers. (For details, see Section 2.4.)

The PA met with the NOWG for twelve monthly meetings in 2008, providing updates on various pooling administration activities. We also participated in the annual performance review and received a "More than Met" expectations rating. The PA worked, and continues to work, cooperatively with the NOWG to make desired industry improvements while also meeting our contractual requirements. (For details, see Section 8.3)

## Regulatory and Compliance

We facilitated one commission educational session on pooling issues as well as participating in four regulatory update calls with state regulatory staff. In addition we submitted all eighty-three required reports on time. (For details, see Section 2.5)

## P-ANI Administration

As Interim Routing Number Administrator (IRNA), we continued to work with the industry to resolve p-ANI issues, responded to general inquires regarding p-ANIs, participated in the Emergency Services Interconnection Forum (ESIF) meetings, assisted providers with ESQK issues, attended meetings to offer assistance and expertise and began development of a permanent p-ANI Administration Change Order. Two new user registrations received and nineteen ESQK requests were received in 2008. (For details, see Section 2.6)

## 2.1 Pooling Administration Contract

### 2.1.1. Personnel

"EVERYONE that I've worked with has been EXTREMELY helpful and professional. I've been in Code Administration for 3 years and I don't have one single complaint. Great group of people to work with."

There were no changes to the pooling organization in 2008. In addition to the organization chart in Section 1.0, a listing of current Pooling Administration Services Center (PASC) personnel and their contact information can be found on [www.nationalpooling.com](http://www.nationalpooling.com) under "Contacts."



### 2.1.2 State-of-the-Art Pooling Administration System (PAS)

“My experience with the Pooling Staff has been exceptional. I find them to be a subject matter expert in their field, timely with responses and available to assist. I am very pleased with their service. In addition, this year’s enhancements to the website have been very beneficial.”

On February 9, 2008, two days ahead of schedule, NeuStar successfully delivered the enhanced Pooling Administration System (PAS) after a 6-month development period that began in 2007 and consumed over 8,000 person-hours while we continued to meet our daily contractual responsibilities. While much of the development work was completed in 2007, there were several key milestones completed in 2008 leading to the successful on-time delivery of the enhanced PAS. Table 2-1 contains key milestones and the dates they were completed.

**Table 2-1  
Enhanced PAS Key Milestones**

DATE/S	KEY MILESTONE
January 3	Notification to customers regarding the FCC-approved system activation schedule and training sessions.
January 7-11	User testing.
January 14	Notification sent to users regarding new system registration.
January 18	Notification that PAS User Guides for the new system were available.
January 21-25	Conducted seven PAS overview sessions for service-providers and service-provider consultants.
January 23	Summary of user testing outcomes sent to FCC.
January 28	Email reminder to register for new system.
January 29 and 31	Conducted two PAS overview sessions for regulatory users.
February 8-9	Enhanced PAS cutover.
February 27 and 28	Conducted website overview sessions for all users.

Testing among the user community took place the week of January 7 and there were a total of 32 participating testers from 8 companies. The following functionality was made available for testing:

- **Individual Block Requests**
  - New Block Request
  - New Block Reservation
  - Assign/Cancel Reservation
  - Block Modification
  - Block Disconnect



- Saved Block Requests
- Modify Pending Request
- **CO/NXX Code Requests**
  - New Code Request
  - Code Modification
  - Code Disconnect
- **Submit Forecast**
  - Create/Modify Forecast
- **Search Forms**
  - View Forms
  - List Forms
- **Reports**
  - Forecast Report
  - Part 1A Report

*“The new PAS System is great, it is user friendly, and there’s more flexibility with the New PAS than before.”*

*“Overall I like the modifications and believe the testing was a success.”*

Because all PAS users were required to submit new registrations in the new PAS system, the PA sent multiple notices and reminders to users. Registration User Guides and user registration for the new PAS were made available to PAS customers on January 14 and new User Guides for the PAS were posted to the website on January 18, well in advance of the new PAS release in February.

During the week of January 21<sup>st</sup>, the PA conducted seven overview sessions for service providers and service provider consultants on the new PAS. There were a total of 195 attendees. After the overview sessions, the PA created a document with questions and answers from the sessions and sent it to

participants via email as well as posting the document on the national pooling website. On January 29 and January 31, the PA conducted two overview sessions for the regulatory users that were attended by a total of 21 participants. PAS users were notified on January 28 of the FCC-approved migration schedule for the implementation of the new system which would make PAS unavailable from Friday, February 8<sup>th</sup> at 5pm pacific time to Monday, February 11<sup>th</sup> at 8am eastern. However, due to advanced planning and the expertise of the NeuStar technical team, the new PAS was made available on Saturday, February 9, only 23 hours and 45 minutes after shutdown of the old PAS.

Table 2-2 highlights the many enhancements that resulted from the new PAS:



**Table 2-2  
PAS Enhancements**

<b>PAS Function</b>	<b>Type of Change</b>
Automatic Password Reset for Security purposes	Upon logging in to PAS for the first time or logging in for the first time after having a password reset by customer support, users will be prompted by PAS to reset their password.
PAS Timeout Extended	The user will be logged out of PAS after 30 minutes of inactivity (the inactivity timeout was previously set to 20 minutes).
View Form & List Forms	<p>The following changes have been made to the view form and list form process:</p> <ul style="list-style-type: none"> <li>• Users will now be able to view Part 1 forms for NPA-NXXs submitted via PAS (on a going forward basis only).</li> <li>• Users will now be able to view the Part 4 – Dedicated Customer forms submitted for dedicated customer CO code requests (on a going forward basis only).</li> <li>• Users may now query by NPA-NXX (for code modifications and disconnects only) as well as by tracking number and NPA-NXX-X.</li> <li>• Ability to print a form from the query results screen, open the form and then select “Printable Version” in the upper right corner of the form. The printable version will open in a separate window.</li> </ul>
New Block Requests	<p>The following changes have been made to the new block request process:</p> <ul style="list-style-type: none"> <li>• The maximum number of blocks which may be requested on a single request is 25.</li> <li>• On the preliminary block request screen the user will be allowed to indicate if they wish to have multiple effective dates for the blocks requested. If they indicate yes, PAS will provide multiple effective date fields on the Part 1A form.</li> <li>• Service Provider Consultant (SPC) users will be required to enter the headquarters address information on Part 1As. This is to allow for one user to submit requests on behalf of multiple companies.</li> <li>• The LATA field is now pre-populated by PAS and may not be edited.</li> <li>• If the user meets months-to-exhaust (MTE) for some of the blocks requested, but not all of the blocks requested, they may choose to proceed with the request based on the existing MTE and receive X number of blocks (those they qualify for). If the user chooses this option, the Part 1A will be updated to reflect X number of blocks being requested rather than the original number entered by the user.</li> <li>• The State Waiver options have changed. <ul style="list-style-type: none"> <li>– If the user selects “Need to Request a State Waiver” they will receive an automatic Part 3 denial.</li> </ul> </li> </ul>



PAS Function	Type of Change
	<p>– If the user selects “Received a State Waiver” they will be allowed to proceed with the request.</p> <ul style="list-style-type: none"> <li>• The three screens for the Part 1B have been consolidated into one screen.</li> <li>• Multiple effective date fields will be provided on the Part 1A form if the user requested multiple effective dates on the preliminary screen.</li> <li>• The user may now save a new block request in progress. If the user clicks “Save”, PAS will save the forms and data entered up to the point at which the “Save” was made. The user will receive a reference number for a saved request. The same request may be saved multiple times and will keep the same reference number until submitted or removed. Requests will be saved for 30 calendar days from the date they were saved.</li> <li>• A “View Forms” button has been provided on request confirmation screens to allow users the ability to view forms for a request just submitted.</li> </ul>
Retrieve Previously Saved New Block Request	<p>This is a new option and not previously available in PAS. Users now have the option to save a request in progress. Below is the information regarding retrieval and completion of a saved request:</p> <ul style="list-style-type: none"> <li>• To retrieve a saved request the user will click on the “Saved Block Requests” tool from the tools frame. PAS will bring up a list of all saved block requests for the states, NPAs and OCNs (Operating Company Number) in the user’s profile. This will include all saved block requests submitted by other users who have the same states, NPAs and OCNs in their profile.</li> <li>• A saved block request is available for completion and submission for 30 calendar days from the date it was saved.</li> <li>• A saved request may be saved again and will keep the same reference number.</li> </ul>
Modify Pending New Block Request	<p>This is a new option and not previously available in PAS. Users now have the ability to make modifications to new block requests (initial and growth) that are pending (have not been opened for processing or been processed by the PA).</p>
Submit a New Block Reservation Request (Growth Only)	<p>This is a new option and not previously available in PAS. Users now have the ability to make reservations for blocks while waiting for a state waiver.</p> <ul style="list-style-type: none"> <li>• A block that has been reserved is held in a reserved status for 6 months from the day the reservation is approved. If the reserved block has not been assigned or cancelled by the block reservation expiration date, the block reservation will be automatically cancelled and the block returned to the pool one day after the 6 month reservation period has passed.</li> </ul>
Submit a Request to Assign/Cancel Block Reservation	<p>This is a new option and not previously available in PAS. Users now have the ability to make reservations when the user needs to request a state waiver; below is the information on requesting a reservation to be assigned or cancelled.</p> <ul style="list-style-type: none"> <li>• To request the assignment or cancellation of a reserved block, the user will click on the “Assign/Cancel Reservation” tool on the tools frame. PAS will bring</li> </ul>



PAS Function	Type of Change
	<p>up a list of reserved blocks for the states, NPAs and OCNs in the user's profile. This will include requests submitted by other users who have the same states, NPAs and OCNs in their profile.</p> <ul style="list-style-type: none"> <li>• Reservations that are cancelled will receive an automatic Part 3 response at the time of submission, confirming the request to cancel the reservation.</li> <li>• For reservations that the SP is requesting to be assigned, PAS will walk the user through all the forms. The user may update any information except: state, NPA, OCN, rate center and number of blocks requested.</li> </ul>
Submit a Block Modification Request	<p>The following changes have been made to the block modification process:</p> <ul style="list-style-type: none"> <li>• Block transfers have been included in the block modification function as Inter-company OCN change.</li> <li>• On the preliminary block modification screen the user will be asked to select checkboxes for the type of change(s) required. The user will only be able to update the fields associated with the change types selected on the preliminary screen.</li> <li>• A Part 1B form will only be provided for block modification requests when Part 1B or Inter-company OCN (Block Transfer) checkbox(s) is selected.</li> </ul> <p>Effective date changes may only be submitted on block requests that have a future effective date. Once the user selects "Effective Date" as the change type, enters the new effective date and clicks "Continue" PAS will provide a list of requests with future effective dates for the state, NPA and OCNs in the users profile.</p>
Submit a Block Disconnect Request	<p>The following changes have been made to the block disconnect process, users are now required to provide additional data on block disconnects:</p> <ul style="list-style-type: none"> <li>• Contaminated Y or N</li> <li>• The number of TNs contaminated if applicable (this includes all Intra-SP Ports not just those of the company returning the code)</li> <li>• Have all Intra-SP Ports been completed? Y or N</li> <li>• Has the block been protected for further assignment? Y or N</li> <li>• The remarks field is a required field if the block being returned has 101 or more contaminated TNs</li> </ul>
Cancel a Block Disconnect Request	<p>This option is new and not previously available in PAS. Users now have the ability to cancel a pending disconnect.</p>
Submit a New Code Request (Initial & Growth)	<p>The following changes have been made to the new code request process:</p> <ul style="list-style-type: none"> <li>• The user will complete a combined Part 1A/Part 1 form in PAS. PAS will create separate Part 1A and Part 1 forms upon submission.</li> <li>• For pool replenishment and LRN requests users will now be able to indicate, within the request, which blocks they wish to have assigned from a code</li> </ul>



PAS Function	Type of Change
	<p>request by clicking on a checkbox for each block to be assigned.</p> <ul style="list-style-type: none"> <li>• For pool replenishment and LRN requests users will now be able to indicate the need for multiple block effective dates on the preliminary code request screen. PAS will then provide separate effective date fields for each block requested on the Part 1/1A screen.</li> <li>• On dedicated customer requests only, the user will be able to select Yes or No for the pooling indicator (Section 1.5 of the Part 1A).</li> <li>• The LATA is pre-populated and may not be edited.</li> <li>• The state waiver options have changed:               <ul style="list-style-type: none"> <li>– If the user selects “Need to Request a State Waiver” they will receive an automatic Part 3 denial.</li> <li>– If the user selects “Received a State Waiver” they will be allowed to proceed with the request.</li> </ul> </li> <li>• Part 1B forms are not provided. If a user requested multiple blocks and one or more of the blocks needs to be updated in NPAC, the user will need to submit a modification on the block(s) after the block(s) is assigned.</li> </ul>
Submit a Code Modification Request	<p>This option is new and not previously available in PAS. The user may now submit the Part 1 form via PAS for pooled NXX (code) modifications.</p> <ul style="list-style-type: none"> <li>• PAS will only accept Part 1 modifications on pooled NXX codes.</li> <li>• On the preliminary code modification screen the user will be asked to select checkboxes for the type of change(s) required. The user will only be able to update the fields associated with the change types selected on the preliminary screen.</li> </ul>
Submit a Code Disconnect Request	<p>This option is new and not previously available in PAS. The user may now submit the Part 1 form in PAS for pooled NXX code disconnects.</p> <ul style="list-style-type: none"> <li>• PAS will only accept Part 1 disconnects for pooled NXX codes.</li> </ul>
Submit a CO Code – Part 4	<p>This option is new and not previously available in PAS. A user may submit a CO Code Part 4 for dedicated customer requests.</p> <ul style="list-style-type: none"> <li>• A Part 4 – Block form will not be accepted for dedicated customer requests.</li> <li>• Upon successful submission of a Part 4 – Dedicated Customer form PAS will create the CO Code Part 4 and the Part 4 for all ten blocks associated with the code.</li> </ul>
Secured PAS Reports	<ul style="list-style-type: none"> <li>• The output for all reports have not changed, however there are now more query options provided up front from which the user can choose.</li> </ul>
Secured Part 1A Report	<p>This is a new report, not previously available in PAS. The Part 1A report lists Part 1As created for all block request types and new code requests in PAS.</p> <ul style="list-style-type: none"> <li>• The user may define their search using the following search criteria: State,</li> </ul>



PAS Function	Type of Change
	<p>NPA, Rate Center, OCN, Type of Request (Initial, Growth, Reservation, Modification, Disconnect), and Date Range. A “Select All” option is available.</p> <ul style="list-style-type: none"> <li>• The date range is based on the date the Part 1A was submitted.</li> <li>• The user may also receive this report via email either on a daily, weekly or monthly basis.</li> </ul>
Secured PAS Part 3 Report	<p>This is a new report, not previously available in PAS. The Part 3 report lists Part 3s created for block and code requests in PAS.</p> <ul style="list-style-type: none"> <li>• The user may define their search using the following search criteria: State, NPA, Rate Center, OCN, Type of Request (Initial, Growth, Reservation, Modification, Disconnect), and Date Range. A “Select All” option is available.</li> <li>• The date range is based on the date the Part 3 was created.</li> </ul>

After allowing customers a few weeks to become accustomed to all of the new features of the PAS, the PA also conducted two website overview sessions on February 27 and 28 to review the new additions and modifications to the publicly-available reports on the website. The PA also sent a summary of this overview session to the state regulator distribution list.

## 2.2 Pooling Administration Services Center (PASC), Concord CA

This section describes PASC activity in 2008 including information about applications processed, blocks assigned, and NXX codes opened. Pooling productivity statistics from the beginning of national thousands-block number pooling can be found in Section 10.0, *Trends in Pooling Since 1998*.

### 2.2.1 Pooling Administration Productivity for 2008

In 2008, there were 108,835 applications (Part 3s) processed by the PA as shown in Table 2-3:

**Table 2-3  
Applications (Part 3s) Processed**

Approvals	96,833
Denials	5,126
Suspensions	5,798
Withdrawals	1,078

Table 2-4 contains the total number of applications processed by activity type.



**Table 2-4**  
**Applications Processed by Type**

	<i>Approved</i>	<i>Denied</i>	<i>Suspended</i>	<i>Withdrawn</i>	<i>Total</i>	<i>Percent of Total</i>
Block Modifications	37,523	239		201	37,963	34.9%
Block Disconnects	8,455	191	82	52	8,780	8.1%
Block Cancel Disconnect	36	1			37	0.0%
Individual Blocks	39,887	3,844		546	44,277	40.7%
Block Reservations	120	46		14	180	0.2%
Process/Cancel Block Reservations	104			3	107	0.1%
Code Modifications	2,311	58	2,359	99	4,827	4.4%
Code Disconnects	168	211	713	22	1,114	1.0%
LRN Blocks	1,635	202	876	71	2,784	2.6%
Dedicated Blocks	1,370	85	135	11	1,601	1.5%
Pool Replenishment Blocks	5,006	200	1,577	55	6,838	6.3%
Manual	218	49	56	4	327	0.3%
<b>Totals</b>	<b>96,833</b>	<b>5,126</b>	<b>5,798</b>	<b>1,078</b>	<b>108,835</b>	<b>100%</b>

Table 2-5 sets forth the number of whole NXX codes opened by the PA in 2008 and for what purpose.

**Table 2-5**  
**NXXs Opened by Purpose**

<b>Purpose</b>	<b>Total</b>	<b>Percent of Total</b>
LRN	879	34%
Dedicated Customer	137	5%
Pool Replenishment	1,555	61%
<b>TOTAL</b>	<b>2,571</b>	<b>100%</b>

The PA also issued **9,580** Part 5s as a result of disconnects, reclamations, and block exchanges during 2008. There were **8,455** actual block disconnects approved during 2008. There were **1,078** Part 3s during 2008 that were withdrawn upon service provider's requests. The PA denied a total of **3,842** individual block requests and **487** block requests requiring a whole CO code

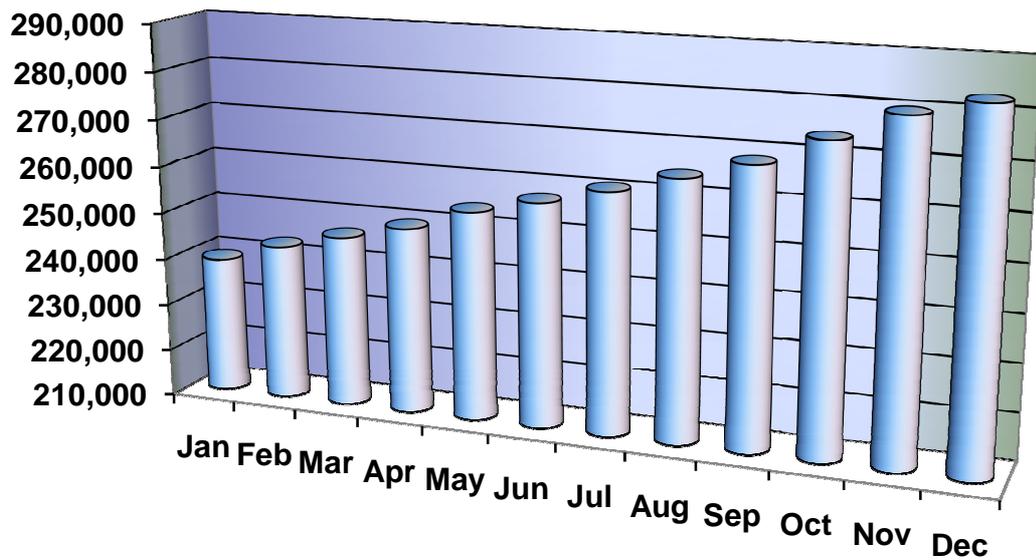


during 2008. Of the **108,835** applications received during 2008, **41%** were requests to modify an existing block, and **99%** of the modification requests were approved.

The PA processed **100%** of applications within 7 calendar days during 2008, which far exceeds the performance metric of 97%.

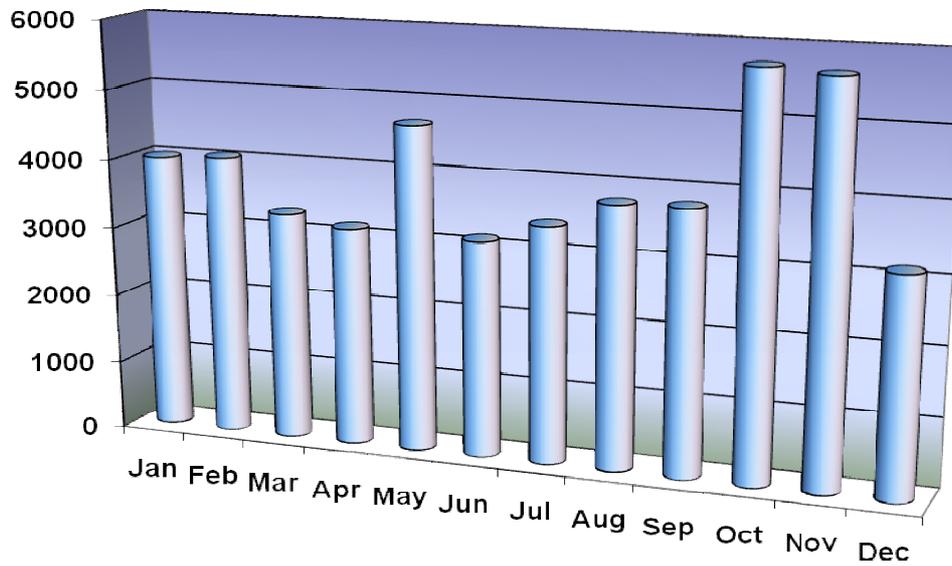
The level of PAS activity managed by the PA declined slightly in 2008. The total number of thousands-blocks assignments remained about the same with less than a **1%** increase in 2008 over 2007. However, the overall number of applications (Part 3s) processed in 2008 decreased by **6%** from 2007.

Figure 1 below shows the cumulative number of assigned thousand-blocks in the PAS during 2008.



**Figure 1: Cumulative Blocks Assigned in 2008**

In order to represent the actual increases in the monthly volume of assignments, Figure 2 depicts the monthly block assignments during 2008 by month.



**Figure 2: Blocks Assigned in 2008 by Month**

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 by the NANPA, and some are denied entirely.

Figure 3 provides a complete overview of all applications processed in the PAS for 2008, which includes approvals, denials, and suspended applications.

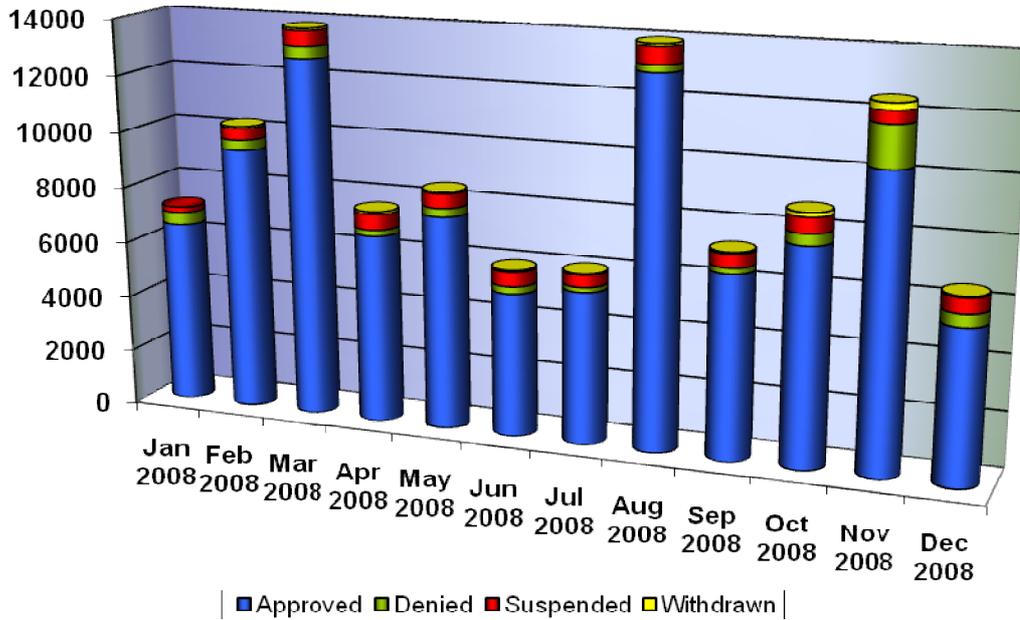


Figure 3: Overview of All Applications Processed by Status

Table 2-6 lists the ten states for which the highest number of applications (Part 3s) occurred in 2008:

Table 2-6  
Ten States with Highest Number of Applications (Part 3s)

<i>State</i>	<i>Total Applications</i>
CA	10,089
TX	9,210
NY	7,769
PA	6,308
IL	5,208
FL	5,023
OH	4,169
NJ	3,886
MI	3,480
MA	3,238



Table 2-7 lists the ten NPA/States with the most applications (Parts 3s) in 2008:

**Table 2-7  
Ten NPA/States with Highest Number of Applications (Part 3s)**

<i><b>NPA/ State</b></i>	<i><b>Total Applications</b></i>
207/ME	1,630
347/NY	1,510
603/NH	1,434
724/PA	977
802/VT	952
573/MO	938
323/CA	914
717/PA	906
845/NY	858
918/OK	858

### 2.2.2 Pool Replenishment

During 2008, as inventories of many pools exhausted in the absence of additional voluntary donations, the PA continued working to replenish pool inventories and focus carriers' attention on keeping adequate inventories to meet their forecasted demand.

Pursuant to Section 2.14 of the Performance Work Statement/Technical Requirements, the PA should make every attempt to have a sufficient quantity of blocks available for assignment to satisfy demand. While the PA has no authority to actually replenish the inventory pool because it is not authorized to obtain resources directly, we manage the process by determining when a pooling rate area inventory will fall below the aggregated six month service provider forecasts, which establishes that it is necessary for service providers to replenish the pool. For replenishment, the PA has to rely on the service providers that can meet both the

MTE (Months-to-Exhaust) and utilization requirements to open a code and then donate blocks from that code to the pool.

In an effort to create new opportunities for service providers to replenish the pools, the PA brought an issue to INC with a number of pool replenishment alternatives. Although the INC explored a number of options that would require service providers with a forecasted need to replenish the pool, INC determined that the only option within its purview was to encourage industry-wide participation in pool replenishment. INC approved a process that offers an option to a service provider applying for more than one block in a pool that needs to be replenished to take some of the requested blocks from the industry inventory pool and the remaining requested blocks from a new NXX for pool replenishment.

Approval for the PA to implement this process was made through Change Order #1 and it was implemented in PAS on May 16, 2008. Through this new process,



service provider and service provider consultant users requesting individual thousands-blocks from the pool in areas where pool replenishment is needed are provided information on the pool inventory status and are then given the option to take all, none, or a portion of their respective requests from a new code for pool replenishment via a Part 1/1A. If the user chooses to take a portion of its request from a new code, the request is split and the PAS creates both a block request and a

code request from one submission. A separate tracking number is generated for each request.

Table 2-8 shows what the carriers opted for from the first screen. Remarkably, the percentages for each option chosen were virtually identical for each month, with the highest requested action being requesting blocks only.

**Table 2-8  
Split Requests for Pool Replenishment in 2008**

Type of request	Requested blocks only	Requested code only	Accepted a split up front	Escape	Totals
Description		Action: willing to wait and take all their blocks from opening a new code	Action: selected that they would take blocks now from inventory, but were willing to wait for a code opening for the rest	Action: escaped from the screen without doing anything	
May	64 (62%)	13 (13%)	12 (12%)	14 (14%)	103
June	110 (59%)	24 (13%)	30 (16%)	23 (12%)	187
July	137 (59%)	34 (15%)	39 (17%)	24 (10%)	234
August	136 (60%)	35 (15%)	35 (15%)	20 (9%)	226
September	222 (60%)	61 (17%)	43 (12%)	43 (12%)	369
October	204 (62%)	44 (13%)	39 (12%)	42 (13%)	329
November	163 (62%)	33 (13%)	42 (16%)	23 (9%)	261
December	120 (59%)	31 (15%)	33 (16%)	21 (10%)	205



Table 2-9 is an overview of pool replenishment in 2008.

**Table 2-9  
2008 Pool Replenishment Overview**

Average number of rate areas per month that had less than a six-month inventory	<b>414</b>
Percentage of total number of rate areas per month that had less than a six-month inventory	<b>2.9%</b>
Average number of rate areas per month that had zero blocks available	<b>93</b>
Percentage of total rate areas per month that had zero blocks available	<b>Less than 1%</b>
Number of CO Code requests for pool replenishment	<b>1,757</b>
Number of CO Codes opened for pool replenishment	<b>1,555</b>

Table 2-10 shows the ten states which required the most pool replenishment activity in 2008.

**Table 2-10  
Ten States with the Most Pool Replenishment Activity**

<b>State</b>	<b>Codes Opened</b>
TX	231
NY	211
CA	182
IL	144
FL	108
PA	108
VA	77
MN	75
AL	73
GA	73



Table 2-11 contains the ten NPA/States that required the most pool replenishment in 2008.

**Table 2-11  
Ten NPA/States Requiring the Most Pool Replenishment**

<b>State NPA</b>	<b>Codes Opened</b>
NY 347	58
OR 541	55
IL 773	30
NY 718	29
MN 218	27
NV 702	27
SC 803	27
PA 717	26
AL 205	25
TX 956	25

### 2.2.3 Reclamation

NeuStar PA initiates reclamation according to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (TPBAG), which directs that, “[a] thousands-block assigned to a service provider 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 individual 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 months following the original effective date identified on the Part 3, the PA sends a reminder notice to the block holder.

If the Part 4 is not received within six 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 10<sup>th</sup> 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 (1<sup>st</sup> 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. There were **22,013** blocks on delinquent Part 4s reports in 2008.

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

In 2008, state commissions or the FCC authorized the PA to reclaim **117** thousands-blocks.



Table 2-12 details the state and number of blocks reclaimed in 2008.

**Table 2-12**  
**State and Number of Blocks Reclaimed**

State	Blocks Reclaimed
INDIANA	41
NEW HAMPSHIRE	19
WASHINGTON	12
ILLINOIS	8
MICHIGAN	8
WEST VIRGINIA	7
NEW JERSEY	5
KANSAS	4
ALABAMA	3
COLORADO	3
NEW YORK	2
PENNSYLVANIA	2
CALIFORNIA	1
CONNECTICUT	1
IOWA	1
<b>TOTAL</b>	<b>117</b>

Also in 2008, the PA developed a process to assist the states with eliminating the number of very old delinquent Part 4s that are carried over month after month on the reclamation list. On April 24, 2008, the PA

sought authority from the FCC to allow carriers with delinquent Part 4s on the list with due dates that *pre-date* January 1, 2006, to sign a “Certification in Lieu of Part 4” attesting that the affected blocks are indeed in service. The document would then be forwarded to the appropriate regulatory agency for approval. Any block for which we received a completed and approved certification would then be removed from the reclamation list and PAS data would be changed to reflect that a Part 4 had been filed.

The FCC approved the process on May 8, 2008, and as result, the number of very old delinquent Part 4s was reduced by 354 blocks. Of the 354 blocks, only nine were reclaimed. The rest were recognized to be in service by the carrier. In order to accomplish this, the PA:

- 1) Sent emails to ten states about the process.
- 2) Explained the process to the NOWG on the regular monthly call.
- 3) Sent 64 notices to carriers.
- 4) Reduced the total number of delinquent Part 4s that are older than 12/31/05 from 372 to 18.



## **2.3 Pooling Administration System (PAS)**

### **2.3.1 PAS Performance**

As detailed in *Section 6*, PAS had one occurrence of unscheduled downtime in 2008 totaling eleven minutes for a total of **99.998%** availability, which means we far exceeded our requirement of 99.9% availability. Although PAS was available and operable during those minutes, it was inaccessible because of ISP issues.

There was one instance of FCC-approved scheduled unavailability that totaled 35 minutes in duration. See 2.3.2 for a description of the improvements made during this scheduled period of unavailability.

### **2.3.2 Pooling Administration System (PAS) Change Orders/Improvements**

Improvements to PAS are generally driven by changes to FCC rules, industry guidelines, or specific service provider or regulatory requests. If such changes or suggested improvements require a change to the PA contract, change orders are submitted to the FCC.

Per Section 2.5.4 of the pooling contract requirements, the PA must provide the FCC, state regulatory agencies and the NANC with a written notice within 15 calendar days summarizing the changes required and “the potential impact of the changes upon service and cost.”<sup>1</sup>

The Numbering Oversight Working Group (NOWG) currently reviews PA change order proposals and provides recommendations to the FCC. To facilitate the review process, the Regional Director External Relations serves as the liaison with the NOWG to address any questions that may arise from their review of any change order proposal.

#### **2.3.2.1 Change Orders Submitted by the PA in 2008**

The PA submitted five (5) change order proposals to the FCC in 2008, covering a variety of system or process changes that are not addressed in the current contract with the FCC.

Table 2-13 provides a description of each 2008 change order and its status as of December 31, 2008.

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<sup>1</sup> FCC contract No. CON07000005, Section 2.5.4 of Section 3 Description /Specification/Work Statement dated July 31, 2007



**Table 2-13**  
**Change Orders Submitted by the PA in 2008**

<b>Number</b>	<b>Type</b>	<b>Description</b>	<b>NOWG Recommendation</b>	<b>FCC Status</b>
2	INC Issue 578	Update TBPAG to Limit Timeframe for Block Reservations	Approved	Approved
3	SP Enhancements	User-Proposed Enhancements to PAS	Approved	Approved
4	INC Issue 591	Change Timeline of Part 1/Part 3 Processing for NANPA	Approved	Approved
5	INC Issue 602	Checking returned blocks in the NPAC	Approved	Pending
6	SP Enhancements	User-Proposed Enhancements to PAS	Pending	Pending

The FCC acted on three (3) change orders in 2008 accepting the three (3) NOWG change order recommendations. Table 2-14 provides details on each change order for which there was an FCC decision in 2008.

**Table 2-14**  
**Change Orders Acted Upon by the FCC in 2008**

<b>Number</b>	<b>Type</b>	<b>Description</b>	<b>NOWG Recommendation</b>	<b>FCC Status</b>
2	INC Issue 578	Update TBPAG to Limit Timeframe for Block Reservations	Approved	Accepted – Contract Modification #4 on 7/2/08
3	SP Enhancements	User-Proposed Enhancements to PAS	Approved	Accepted – Contract Modification #5 on 10/7/08
4	INC Issue 591	Change Timeline of Part 1/Part 3 Processing for NANPA	Approved	Accepted – Contract Modification #5 on 10/7/08



Table 2-15 shows three (3) change orders, with descriptions of the changes that were incorporated into PAS in 2008.

**Table 2-15**  
**Change Orders Implemented in 2008**

<b>Number</b>	<b>Description of Changes</b>	<b>Implemented</b>
1	<p>INC Issue #519 - Pool Replenishment – Provides service provider (SP) and service provider consultant (SPC) users with the capability to submit one request for pool replenishment that is a “split block/code request”. A split block/code request is made available only in cases where an SP or SP consultant is requesting individual thousands-blocks from the pool, in areas where pool replenishment is needed. The user is provided information on the pool inventory status and is then given the option to take all, none, or a portion of its request from a new code for pool replenishment via a Part 1/1A. If the user chooses to take a portion of its request from a new code, the request is split and PAS creates both a block request and a code request from one submission. A separate tracking number will be provided for each request.</p>	May 16, 2008
2	<p>INC Issue #578- Update TBPAAG to Limit Timeframe for Block Reservations – For any new block reservations assigned after 9/26:</p> <ul style="list-style-type: none"> <li>• The block reservation period has been modified from six (6) months to three (3) months.</li> <li>• Service providers may also request a one-time 3-month extension, if the state has not responded to the waiver request, prior to the block reservation expiration date.</li> <li>• PAS will now send a Block Reservation Expiration Notice seven (7) calendar days prior to the block reservation expiration date reminding service providers that if no action is taken, the block will be placed back in the pool one (1) calendar day after the block reservation expiration date.</li> </ul>	September 26, 2008



Number	Description of Changes	Implemented
4	INC Issue #591 - Change Timeline of Part 1/Part 3 Processing for NANPA – Shortened the processing time for NANPA which affects our default effective dates for codes. The default dates will be changed from 72 days to 66 days. In addition a checkbox was added on the Part 1/1A for earliest effective date. If the carrier wants the earliest effective date on any request it should leave the default effective date and place a checkmark in the checkbox for earliest effective date.	November 14, 2008

### 2.3.4 PAS and Website Overview Sessions

In 2008, the National Pooling Administrator conducted a total of 11 training sessions for service providers and regulators.

The first round of training sessions was provided in conjunction with the rollout of the enhanced PAS on February 9, 2008. Prior to the new PAS rollout, the PA conducted seven web-based training sessions for service provider and service

provider consultant users. A total of 285 users attended these sessions. In addition, two web-based training sessions were held for regulatory users, with a total of 26 attendees from 21 states. The goal of these sessions was to familiarize users with the many enhancements and changes made to the new PAS. In addition, a ‘Question and Answer’ document was created from these sessions and posted to the website. Table 2-16 contains the training session type, dates and number of sessions.

**Table 2-16  
2008 Enhanced PAS Training**

New PAS Training Session	Date & Number of Sessions
Overview of the new PAS system enhancements and changes for Service Providers and Service Provider Consultants	January 21 – two sessions January 22 – two sessions January 23 – one session January 24 – one session January 25 – one session
Overview of the new PAS system enhancements and changes for State and Federal Regulators	January 29 and 31

In January, 2008, we developed and conducted a “Pooling 101” training session to be held in advance of a Supplemental

Implementation Meeting (SIM) when a state orders additional mandatory pooling as a result of delegated authority. Because



the additional pooling is most often in areas where service providers are unfamiliar with pooling process and procedures, we developed this training so that they would more fully understand the activities that take place during the SIM and then the subsequent implementation of pooling in their areas. There was only one SIM in 2008, for the Wisconsin 715 and 920 NPAs, so we held our first [and so far only] "Pooling 101" training session for 28 Wisconsin service providers and state regulatory staff on January 30, 2008. The "Pooling 101" presentation is available on the website under DOCUMENTS.

The following are comments from participants in "Pooling 101:"

*"Very good information - I feel I am ready to get going on the block donations now."*

*"I thought the information provided was excellent, I give it a 5."*

*"Presentation was methodical and easy to understand. Well Done!"*

On May 13 and May 14, 2008, the PA also conducted three PAS training sessions to review the pool replenishment enhancements made as a result of the

Change Order 1 implementation in PAS as well as changes to NPAC validations. There were a total of 74 participants in the three classes.

## 2.3.5 Help Desk and Trouble Tickets

### 2.3.5.1 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 questions and requests for technical support, and attempts to promptly confirm the cause of a problem.

The CSR:

- Opens, logs, and monitors trouble tickets to ensure that problems are resolved in a timely manner, and is able to quickly identify the appropriate person to whom to escalate issues, as needed;
- Works with carriers to troubleshoot problems over the phone and at the desktop, to assist in resolving technical problems;
- Answers a variety of inquiries from customers, including questions regarding use of forms and the PAS, and assists users with locating documentation; and
- Creates, deletes, and maintains user accounts and passwords.



In 2008, the Customer Support Desk handled approximately 4,897 calls from customers. Although not unanticipated because of the introduction of the new PAS and subsequent change order updates, this total represents a significant increase in the total number of calls handled by the Help Desk in 2007 (3,900). The total number of calls received in 2008 is not as high, however, as the number of calls received in

2005 and 2006. Table 2-17 shows the numbers of calls to the Help Desk by year since 2003.

**Table 2-17**  
**Number of Help Desk Calls by Year from 2003 through 2008**

YEAR	NUMBER OF HELP DESK CALLS
2003	2,900
2004	4,700
2005	6,000
2006	5,200
2007	3,900
2008	4,897

### 2.3.5.2 Trouble Tickets

In 2008, there were 28 trouble tickets opened by the Help Desk related to PAS errors and one instance of unscheduled unavailability. Although this represents a significant increase from the total number of trouble tickets opened in 2007 (8), it was largely due to the release of the enhanced PAS, where additional functionality and validations were added. At no time was any user's information compromised nor was any user prevented from performing a transaction in PAS. PAS also remained available 99.998% of the time in 2008. Where needed, NeuStar created a work-around while the issue was being fixed to ensure that users could complete their transaction successfully in PAS.

**Table 2-18**  
**2008 Trouble Tickets**

Ticket Number	Date Opened	Date Closed	Days/Hours Opened	Ticket Type	Testing and build required
HD100940	01/02/2008	01/03/2008	1 Day, 6 Hours	PAS SYSTEM ERROR	No



<b>Ticket Number</b>	<b>Date Opened</b>	<b>Date Closed</b>	<b>Days/Hours Opened</b>	<b>Ticket Type</b>	<b>Testing and build required</b>
HD100941	02/11/2008	02/15/2008	4 Days, 10 Hours	PAS SYSTEM ERROR	Yes
HD100942	02/12/2008	02/15/2008	3 Days, 12 Hours	PAS SYSTEM ERROR	Yes
HD100943	03/18/2008	03/21/2008	3 Days, 5 Hours	PAS SYSTEM ERROR	Yes
1000	04/30/2008	04/30/2008	2 Hours	PAS SYSTEM ERROR	No
1020	05/20/2008	05/21/2008	16 Hours	PAS SYSTEM ERROR	No
1040	06/11/2008	06/27/2008	16 Days, 5 Hours	PAS SYSTEM ERROR	Yes
1060	06/20/2008	06/20/2008	1 Hour	PAS SYSTEM ERROR	No
1080	06/25/2008	06/27/2008	1 Day, 23 Hours	PAS SYSTEM ERROR	Yes
1100	07/08/2008	07/25/2008	17 Days, 5 Hours	PAS SYSTEM ERROR	Yes
1120	07/18/2008	07/25/2008	7 Days, 5 Hours	PAS SYSTEM ERROR	Yes
1140	07/22/2008	07/23/2008	1 Day, 1 Hour	PAS SYSTEM ERROR	Yes
1160	09/08/2008	09/26/2008	18 Days, 12 Hours	PAS SYSTEM ERROR	Yes
1180	09/11/2008	09/26/2008	15 Days, 4 Hours	PAS SYSTEM ERROR	Yes
1200	09/22/2008	09/26/2008	4 Days, 8 Hours	PAS SYSTEM ERROR	Yes
1201	09/24/2008	09/26/2008	2 Days	PAS SYSTEM ERROR	Yes
1220	09/29/2008	11/14/2008	46 Days, 14 Hours	PAS SYSTEM ERROR	Yes
1240	10/02/2008	11/14/2008	43 Days, 6 Hours	PAS SYSTEM ERROR	Yes
1241	10/06/2008	11/14/2008	39 Days, 7 Hours	PAS SYSTEM ERROR	Yes
1260	10/08/2008	11/14/2008	37 Days, 8 Hours	PAS SYSTEM ERROR	Yes



Ticket Number	Date Opened	Date Closed	Days/Hours Opened	Ticket Type	Testing and build required
1280	10/27/2008	11/14/2008	18 Days, 12 Hours	PAS SYSTEM ERROR	Yes
1300	10/29/2008	11/14/2008	16 Days, 9 Hours	PAS SYSTEM ERROR	Yes
1301	11/03/2008	N/A	57 Days, 8 Hours	PAS SYSTEM ERROR	Yes
1320	11/25/2008	12/02/2008	6 Days, 23 Hours	PAS SYSTEM ERROR	No
1340	11/24/2008	N/A	36 Days, 5 Hours	PAS SYSTEM ERROR	No
1341	12/04/2008	N/A	26 Days, 11 Hours	PAS SYSTEM ERROR	Yes
1380	12/29/2008	12/29/2008	11 Minutes	Website Down	No
1400	12/29/2008	01/04/2009	1 Day, 10 Hours	PAS SYSTEM ERROR	No

Table 2-19 shows the number of trouble tickets, by year, since 2003. During that period, 2008 ranks third.

**Table 2-19**  
**Number of Trouble Tickets from 2003 through 2008**

YEAR	NUMBER OF TROUBLE TICKETS
2003	49
2004	41
2005	27
2006	18
2007	8
2008	28

## 2.4 Pooling Implementation Management

### 2.4.1 Rate Area File Quality Control and Maintenance

The Data Quality and Implementation Manager (DQIM) manages the quality control and maintenance of the rate area files located on the website. The rate area



files identify the participation status designation of all rate areas in each NPA, including where service providers are either required to participate in pooling (Mandatory), are required to participate when a second service provider enters the rate area (Mandatory Single Service Provider), may participate in pooling (Optional), or where there is currently no pooling (Excluded).

The six current status designations of rate areas as defined in the *NPA/Rate Area Reports* are as follows:

1. **Mandatory (M)** - This rate center is located in a top 100 MSA and service providers with numbering resources in this rate area that have not been granted a specific exemption must pool in this rate area.
2. **Mandatory State (M)** - Pooling was implemented in this rate center pursuant to a state commission order. This rate center is not in a top 100 MSA, but has one or more pooling-capable service providers, and is considered a mandatory pooling rate center.
3. **Mandatory Single Service Provider (M\*)** - This rate center is located in a top 100 MSA, but has only one service provider that has numbering resources. This rate center will be considered optional under these conditions and

designated as M\*. When a second service provider receives numbering resources in this rate center, the designation will be changed to M for Mandatory.

4. **Mandatory State Single Service Provider (M\*)** - Pooling has been implemented in this rate center pursuant to a state commission order. This rate center is not in a top 100 MSA and has only one service provider that has numbering resources. This rate center will be considered optional under these conditions and designated as M\*. When a second service provider receives numbering resources in this rate center, the designation will be changed to M for Mandatory State.

5. **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 at its option. Service providers may voluntarily participate in thousands-block number pooling in an Optional rate center outside the top 100 MSAs.

6. **Excluded (X)** - This rate center is not in a top 100 MSA and no service provider is currently participating in pooling. This rate center is not available in the Pooling Administration System (PAS).

Table 2-19 shows the total number of distinct pooling rate areas in PAS by year.



**Table 2-19**  
**Total Number of Distinct Pooling Areas in PAS by Year**

<i>Status Designation</i>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
M*	0	683	885	675	583	519	460
M	4,090	4,782	5,796	4,679	4,765	4,820	4,861
O	1,695	5,763	5,870	6,335	6,439	5,728	5,460
M	1,448	2,053	1,607	1,479	1,636	2,401	2,827
M*					216	547	677
X	3,648	7,260	6,381	5,489	5,004	4,605	4,315
Total	10,881	20,541	20,539	18,657	18,643	18,620	18,600
Total Pooling Areas	7,233	13,281	14,158	13,168	13,639	14,015	14,285
Total Mandatory Pooling Areas	5,538	7,518	8,288	6,833	7,200	7,221	7,688

#### **2.4.2 Rate Area File Changes**

The DQIM is not only responsible for the accurate recording of all pooling information associated with every NPA, including the status designation for each rate center, but is also responsible for the maintenance and tracking of all changes related to pooling areas that occur as a result of FCC and state orders and Office of Management and Budget (OMB) directives. Because of the frequent number of changes in the rate area files for various reasons, and in response to industry suggestions, we established a link on the PA website to a monthly report of the most recent changes made to these rate area files called *Rate Center File Changes Report* in 2003. Prior to the establishment of this report, service providers had to compare the previous month's data in NPA rate area files in order to determine whether any changes or additions had taken place. Effective in September, 2008, the PA made rate center file changes available in real-time through the website. In 2008, the PA made **1,165** rate area designation changes.



Table 2-20 shows how many rate areas were changed during each month in 2008.

**Table 2-20**  
**Summary of Rate Area Designation Changes for 2008**

<b>RATE CENTER CHANGES</b>													
<b>2008</b>													
<b>REASON</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>TOTALS</b>
<i>Changes in Status:</i>													
M* to M	9	1	3	4		6	12	15	3	7	4	1	65
M* to M	5	3	2	2	7	1	5	27	4	21	8	2	87
M to M*													0
M to M*							1						1
M to M													0
O to M													0
O to M	58				217	65							340
O to M*	28				126	62							216
X to M													0
X to M*													0
X to M*													0
X to O	16	5	5	10	6	2	36	68	4	143	4	4	303
New Rate Centers			111	14					14				139
Deleted Rate Centers	1			2	2						7		12
Rate Center Name Change									2				2
<b>TOTALS</b>	<b>117</b>	<b>9</b>	<b>121</b>	<b>32</b>	<b>358</b>	<b>136</b>	<b>54</b>	<b>110</b>	<b>27</b>	<b>171</b>	<b>23</b>	<b>7</b>	<b>1,165</b>

### 2.4.3 Supplemental Implementation Meetings (SIMs)

NeuStar conducted one Supplemental Implementation Meeting (SIM) in 2008 (See Table 2-21 below):

**Table 2-21**  
**2008 Supplemental Implementation Meeting**

<b>STATE</b>	<b>STATE ORDER ISSUED</b>	<b>NPA's AFFECTED</b>	<b>SUPPLEMENTAL IMPLEMENTATION MEETING (SIM)</b>	<b>POOL START DATE</b>
Wisconsin	12/20/2007	715 and 920	2/5/2008	5/1/2008



#### 2.4.4 NRUF/Semi-Annual Forecast Report

The NRUF (Numbering Resource Utilization/Forecasting) report (Form 502) is used by the North American Numbering Plan Administration (NANPA) to monitor and project exhaust in area codes as well as in the NANP, overall. Service providers participating in pooling are required by Section 6.0 of the Thousands-Block Pooling Administration Guidelines (TBPAG) to submit their NRUF to the NANPA on a semi-annual basis on or before February 1 for the period ending on December 31, and on or before August 1 for the period ending on June 30 of each year. Service providers submit the Thousands-Block Forecast Report (Appendix 1 in the TBPAG) to Pooling Administration for each of their separate OCNs at the thousands-block level, per rate area, for every NPA in which they have resources, as of June 30 and December 31, each year. This semi-annual report (due February 1 and August 1) includes a five-year forecast of demand for blocks-by-year. The data provided by the service providers in these forecasts is treated confidentially by the PA.

During 2008, the data provided by the service providers was aggregated by the PA at the rate area level for all NPAs in pooling and used by the PA to provide a rate area NRUF to NANPA and to determine if a critical industry inventory insufficiency existed within any rate area. The PA forwarded its aggregated NRUF data to the NANPA and a separate consolidated forecast report to the FCC according to the required deadlines, within 21 calendar days of both the February 1, and August 1 dates. Table 2-22 contains the PA NRUF/forecast results for both semi-annual reporting periods in 2008.

**Table 2-22  
NRUF/Forecast Results for 2008**

DATE	NPAs	JURISDICTIONS	FORECASTS ~ YEAR 1		
			BLOCKS FORECASTED	BLOCKS AVAILABLE	CODES FORECASTED
Feb-08	275	52	32,668	185,508	1,207
Aug-08	275	52	31,547	183,174	1,294

## 2.5 Regulatory and Compliance

### 2.5.1 Regulatory Update Conference Calls



In 2008, the PA participated in four regulatory update conference calls on April 3, June 5, September 4 and November 12. Topics included updates on the delegated authority petitions, p-ANI administration, PA Survey, INC issues, and status of change order-related activities.

### **2.5.2 Educational Sessions**

On February 14, 2008, the PA conducted an in-person educational session on pooling processes and procedures, in the NeuStar corporate offices in Sterling, VA, which was attended by eighteen regulatory staff members from around the country. During the session we reviewed safety valve, reclamation, forecasting, and application processing procedures in addition to the new reports available through the website. By conducting these sessions we hope to make it easier for regulators to respond to thousands-block pooling issues in their states.

### **2.5.3 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.

The PA processed **229** denials as a result of the Red Light Rule in 2008, up from **218** in 2007.

### **2.5.4 Reporting Compliance**

The following are the Contract Data Requirements List (CDRL) documents required by the PA contract and submitted during the 2008 calendar year. The chart identifies the current contract section number and when those required reports were submitted.

#### **2.5.4.1 Contract Data Requirements List (CDRL) – Plans**

The PA is required by the contract to submit numerous reports and plans that are enumerated in at Clause C.1 of the CONTRACT FOR POOLING ADMINISTRATION SERVICES, Section 4, Contract Data Requirements List (CRDL) (Deliverables). Most the CDRL documents were submitted and approved in 2007.

Table 2-23 shows the CDRL plans that were submitted on-time to, and accepted by the FCC in 2008.



**Table 2-23  
CDRL Plans Submitted in 2008**

<b>REPORT NAME</b>	<b>SECTION REFERENCE</b>	<b>REQUIRED DEADLINE</b>	<b>DATE SUBMITTED</b>	<b>DATE ACCEPTED</b>
Maintenance Plan	CDRL 4.10 per Section 3.17	Within 150 calendar days of contract award	January 11	January 17
Management Reporting Plan	CDRL 4.6 per Section 3.11	Within 60 calendar days of contract award	October 10, 2007 then revised on February 5, 2008 to reflect provisions of Contract Modification #3	February 7
System Documentation	Section 3.19	Within 180 days of contract award	February 11	March 13

**2.5.4.2 Contract Data Requirements List (CDRL) – Recurring Reports**

In addition to the plans listed above, there are CDRL reports that must be submitted annually, semi-annually, quarterly, and monthly. Table 2-24 contains the Contract Data Requirements List (CDRL) recurring reports that were submitted by the PA during the 2008 calendar year according to the deadlines established in the current contract. These reports are available for viewing on the PA website.

**Table 2-24  
Recurring CDRL Reports Submitted in 2008**

<b>REPORT NAME</b>	<b>SECTION REFERENCE</b>	<b>REQUIRED INTERVAL</b>	<b>DATES SUBMITTED</b>
Staffing Report	CDRL 4.6.4.3 per Section 2.3	1 <sup>st</sup> working day of the month	Jan 2, Feb 1, Mar 3, Apr 1, May 1, Jun 2, Jul 1, Aug 1, Sep 2, Oct 1, Nov 3, Dec 1
Thousands –Block Pooling Report	CDRL 4.6.4.1 per Section 2.21 Also see 2.22.4.5	Monthly	Jan 15, Feb 15, Mar 14, Apr 15, May 15, Jun 13, Jul 15, Aug 14, Sep 12, Oct 15, Nov 14, Dec 15



REPORT NAME	SECTION REFERENCE	REQUIRED INTERVAL	DATES SUBMITTED
System Performance Report	CDRL 4.6.4.2 per Section 2.22 Also see 2.22.4.5	Monthly	Jan 15, Feb 15, Mar 14, Apr 15, May 15, Jun 13, Jul 15, Aug 14, Sep 12, Oct 15, Nov 14, Dec 15
Pooling Matrices Report	CDRL 4.6.3.1 Per Section 2.21.2 Also see 2.22.4.5	Quarterly	Jan 15, Apr 11, Jul 15 and Oct 15
Forecasted Demand	CDRL 4.6.2.1 Per Section 2.17.1	Semi-Annual	Feb 13 and Aug 14
Rate Area	CDRL 4.6.2.2	Semi-Annual	Mar 14 and Aug 14
Inventory Pool Status	Section 2.16.5		July 11
Annual	CDRL 4.6.1 Per Section 2.21.1	Annual	Mar 31
By Request ( <i>Ad Hoc</i> )	CDRL 4.6.5 Per Section 2.21.3	Within three business days	As requested

#### 2.5.4.3 Other Required Reports

Table 2-25 contains the other reports required by the contract that the PA submitted in 2008.

**Table 2-25  
Other Required Reports Submitted in 2008**

REPORT NAME	SECTION REFERENCE	REQUIRED INTERVAL	WHERE	DATES SUBMITTED
Staffing Report	Section H.3.3	Monthly	To FCC only	Jan 2, Feb 1, Mar 3, Apr 1, May 1, Jun 2, Jul 1, Aug 1, Sep 2, Oct 1, Nov 3, Dec 1
Progress Report	Section G.5	Monthly by the 15 <sup>th</sup> of the month	To FCC only	Jan 15, Feb 15, Mar 14, Apr 11, May 15, Jun 13, Jul 15, Aug 14, Sep 12, Oct 15, Nov 14, Dec 15
Quarterly Pooling Metrics	Section 2.22.4.5	Quarterly	To PA Website only	Jan 15, Apr 15, Jul 15, Oct 15
Inventory	Per Section 3.21	Annual	To FCC	Jul 11



## 2.6 Interim RNA Administration (p-ANI)

The PA was designated as the Interim Routing Number Administrator (IRNA) on September 6, 2006, and authorized to assign p-ANIs under certain limited circumstances. In 2008, we responded to general inquires regarding p-ANIs, assisted providers with p-ANI related issues, and attended industry meetings to address p-ANI items. In 2008, the IRNA received two new user registrations and 19 ESQK requests. (For details, see Table 2-26)

When the FCC awarded the new PA contract in August, 2007, it included the provision that the new national PA will act as the permanent p-ANI Administrator once the FCC directs the permanent process. As of December 31, 2008, the permanent process for p-ANI administration has not been directed by the FCC. However, at the request of the FCC we began working on developing a change order outlining how we would implement the permanent p-ANI Administration Guidelines along with a project plan. In 2008 we used the permanent p-ANI Administration Guidelines and worked with system engineering to develop the detailed system requirements.

We worked with the Emergency Services Interconnection Forum (ESIF) and the Industry Numbering Committee (INC) on refining the permanent p-ANI Administration Guidelines by providing contributions with proposed changes to the guidelines. In addition, Amy Putnam was named an ESIF-ECDR co-chair. We continued to respond to general inquiries regarding p-ANIs, assisted providers with p-

ANI related issues, and attended industry meetings to address p-ANI related items.

**Table 2-26**  
**Interim RNA Activity as of December 31, 2008**

ESQK New User Registrations Received	8
<i>Approved</i>	4
<i>Denied</i>	4
ESQK Requests Received	20
<i>Approved</i>	18
<i>Denied</i>	2

## 2.7 2008 PA Survey

The PA strives to publish an annual survey through which service providers and regulators may assess the PA's 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.

We began the survey on September 8 and completed it on September 30. Participants had a choice of returning the survey via email or fax. Prospective survey participants were asked to rate PA performance on a scale of one (1) to (5), with one (1) being lowest and five (5) being highest. We developed the 20 questions to measure our performance in user interface, timeliness, knowledge, website information



and overall customer service. There were 120 surveys returned, 29 of which were from state regulators.

There was a 6% increase in the total number of surveys returned from the 2007 survey, as well as a 45% increase in the number of surveys returned by regulators.

We attribute that increase to the release of the enhanced PAS and website improvements. All “overall” scores improved from the 2007 survey, with the website score increasing most from a 4.3 to a 4.6.

Table 2-27 lists the actual questions and average survey response scores for 2008.

**Table 2-27**  
**PA 2008 Survey Questions and Average Response Score**

5	4	3	2	1	0
Strongly Agree	Agree	Somewhat Agree	Disagree	Strongly Disagree	Not Applicable
<b>Surveys Returned =</b>	<b>120</b>	<b>Surveys Returned by Regulators = 29</b>			<b>Average Score</b>
The Pooling Staff members are knowledgeable about the thousands-block application processes.					4.8
The pooling staff members are professional in interactions with me.					4.8
The pooling staff members provide sufficient information regarding pooling at industry meetings.					4.6
The pooling staff members are knowledgeable about pooling related issues, and when necessary, refer me to the relevant guidelines, websites, or other appropriate resources.					4.7
The email notifications from the Pooling Staff members are helpful and informative.					4.6
The pooling staff members respond to my data requests in a timely manner.					4.8
Overall, I am satisfied with the level of service provided by the Pooling Staff members.					4.7
The Help Desk personnel assist me with resolution of my PAS issues and process questions.					4.7
When necessary the Help Desk personnel refer me to the relevant guidelines, websites or other appropriate resources.					4.6
The Help Desk personnel assist me with managing my PAS account issues.					4.8



Overall, I am satisfied with the level of service provided by the Help Desk personnel.	4.7
The Pooling Administration System (PAS) allows me to easily fill out and submit applications, donations, forecasts and Part 4s.	4.6
The reports available through PAS such as the Part 1A report, Part 3 report, Assignments Needing Part 4 report, Forecast report and Donation reports are useful to me.	4.6
I am satisfied with the new streamlined ability in the enhanced PAS to submit Part 1s, Part 1As, and Part 4s.	4.6
The automatic pool replenishment information provided in PAS at the time requests are being submitted is helpful in determining when to replenish the pool.	4.5
Overall, I am satisfied with the level of service provided by the Pooling Administration System (PAS).	4.6
I am able to locate information such as SIM material, User Guides, Frequently Asked Questions (FAQs), reports and other information on the pooling website as needed.	4.4
I find the information provided by the publicly available reports such as the Block Report, Block Report by Region, NPA/Rate Center Report, and the Pool Tracking Report on the website useful.	4.5
I find the enhancements on the website such as the ability to download and print publicly available reports useful, e.g., the Block Report, NPA/Rate Center Report, and the Pool Tracking Report.	4.6
Overall, I am satisfied with the pooling website.	4.6



The 2008 survey responses demonstrate significant satisfaction with PA performance. Following are some of the comments that supported this:

"My experience with the Pooling Staff has been exceptional. I find them to be a subject matter expert in their field, timely with responses and available to assist. I am very pleased with their service."  
"In addition, this year's enhancements to the website have been very beneficial."

"NeuStar provides exceptionally outstanding information and support to this commission. I have nothing but praise and admiration for the quality of their services. Keep up the good work."

"I am pleased with the quality of service provided and the only comment would be to just keep doing what you are doing – it is working well!"

"I appreciate the opportunity to offer annual input. Your organization does an excellent job of supporting both the public and private sector."

"Pooling Staff members are excellent; they are very responsive and knowledgeable. The changes to PAS are great improvements, especially the streamlined ability to send Part 1s online."



"I've been very happy and impressed with the service provided by the PA team. They're knowledgeable and always willing to provide guidance & assistance."

"You have a wonderful, helpful, team of workers who are always professional and knowledgeable. My team and I really enjoy working with all of them."

"The pooling administrators and their Help Desk are always willing to assist with questions and concerns. If they do not have the information they are very professional in handling the questions in a timely manner and getting back to me and directing me to the data."



## Section 3 - Identification of Existing and Potential Pooling Areas

In this section, Pooling Administration summarizes the number of existing pooling areas. While we do not include a distinct list of separate “potential” pooling areas, there are currently 4,315 rate areas in which no carrier is pooling, and which could therefore be considered “potential” pooling areas. (See Section 3.2)

The PA designates each rate area according to the definitions shown in Section 2.4.

### 3.1 Identification of Existing Pooling Areas

The chart below identifies the 14,285 pooling areas (i.e., distinct rate areas), and their status designation, by state, as of December 31, 2008. A pooling area is defined as either “mandatory” or “optional.” Rate areas with a designation of “excluded” are not considered pooling areas.

**Table 3-1**  
Existing Pooling Areas and Their Status Designation, by State, as of December 31, 2008

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory (M) (State)</i>	<i>Mandatory (M*) (Single SP)</i>	<i>Mandatory (M*) (State Single SP)</i>	<i>Optional (O)</i>	<i>Total</i>
AK					19	19
AL	63	67	6	19	102	257
AR	34		13		150	197
AZ	26		21		30	77
CA	437	83	17		153	690
CO	21	5	5		134	165
CT	70	19				89
DC	1					1
DE	8				22	30
FL	120	25	1		94	240
GA	73		6		122	201
HI	1				5	6
IA	70	52	39		383	544
ID	14	66	5	61		146
IL	212		41		497	750
IN	205	74	17		174	470
KS	50		36		196	282
KY	42	118	5	45	135	345
LA	54		7		146	207



<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory (M) (State)</i>	<i>Mandatory (M*) (Single SP)</i>	<i>Mandatory (M*) (State Single SP)</i>	<i>Optional (O)</i>	<i>Total</i>
MA	234	30				264
MD	112	53				165
ME	39	101	11		55	206
MI	205	112	9	14	227	567
MN	37		7		194	238
MO	137	377	21	186		721
MS	33		6		137	176
MT					120	120
NC	131	24	7		198	360
ND					71	71
NE	25	97	7	152	178	459
NH	32	92			14	138
NJ	187		1		21	209
NM	10		5		51	66
NV	21		4		38	63
NY	402	243	1	20	82	748
OH	360	157	12	18	136	683
OK	96	15	45		152	308
OR	35	103	1		46	185
PA	414	97	1		264	776
PR	48		1		36	85
RI	25					25
SC	81		26		89	196
SD					75	75
TN	103		6		166	275
TX	282	7	43		504	836
UT	19	9	5	1	40	74
VA	119	184			14	317
VT		101			1	102
WA	56	148	4	30	1	239
WI	110	221	18	122	131	602
WV	7	147		9	3	166
WY					54	54
<b>Grand Total</b>	<b>4,861</b>	<b>2,827</b>	<b>460</b>	<b>677</b>	<b>5,460</b>	<b>14,285</b>

### 3.2 Identification of Potential Pooling Areas



The chart below identifies the breakdown by state of the 4,315 rate areas that were designated as “excluded” from pooling as of December 31, 2008 and could be considered “potential” pooling areas. These rate areas are not available for pooling in PAS. This chart does not include any rate areas designated as “mandatory” or “optional.”

**Table 3-2**  
**Rate Areas “Excluded” from Pooling (“Potential” Pooling Areas)**  
**as of December 31, 2008**

State	Excluded (X)
AK	262
AL	53
AR	185
AZ	53
CA	49
CO	46
FL	41
GA	159
IA	273
IL	235
IN	56
KS	292
KY	27

State	Excluded (X)
LA	71
MA	2
ME	43
MI	67
MN	405
MS	63
MT	140
NC	71
ND	229
NH	11
NM	97
NV	33
OH	56

State	Excluded (X)
OK	222
OR	69
SC	44
SD	198
TN	66
TX	442
UT	64
VA	52
VT	39
WV	62
WY	38

### 3.3 Summary of Existing and Potential Pooling Areas

Tables 3-3 through 3-5 summarize the existing and potential pooling areas, including rate area facts, state/jurisdiction status and a complete summary by status designation.

**Table 3-3**  
**Pooling Rate Area Facts**

Total Number of Distinct Rate Areas	18,600
Total Number of Distinct Rate Areas Available for Pooling in PAS	14,285
Percentage of Distinct Rate Areas that are Available for Pooling in PAS	76.8%
Total Number of Mandatory Distinct Rate Areas	7,688
Percentage of Distinct Rate Areas that are Mandatory	41.3%
Total Number of Distinct Mandatory Single-Service Provider Rate Areas	1,137
Percentage of Distinct Rate Areas that are Mandatory Single-Service Provider	6.1%



Total Number of Distinct Optional Rate Areas	5,460
Percentage of Distinct Rate Areas that are Optional	29.4%
Total Number of Distinct Rate Areas Excluded from Pooling	4,315
Percentage of Distinct Rate Areas that are Excluded from Pooling	23.2%
Total Number of Rate Center Designations Changed in 2008 (see Section 2.4.1 for detail)	1,165

**Table 3-4  
Summary of State/Jurisdiction Pooling Status**

States/jurisdictions where number pooling has been implemented	All states, the District of Columbia and Puerto Rico
States/jurisdictions that have only mandatory pooling areas	Connecticut, District of Columbia, Idaho, Maryland, Missouri, Rhode Island
States that have zero mandatory pooling areas	Alaska, Montana, North Dakota, South Dakota, and Wyoming
States/jurisdictions that have zero excluded rate areas	Connecticut, Delaware, District of Columbia, Hawaii, Idaho, Maryland, Missouri, Nebraska, New Jersey, New York, Pennsylvania, Puerto Rico, Rhode Island, Washington, Wisconsin
States/jurisdictions that have implemented additional mandatory pooling as of December 31, 2008 as a result of delegated authority for state pooling trials prior to the rollout of national pooling or as a result of additional delegated authority after the national rollout	California, Colorado, Connecticut, Florida, Iowa, Indiana, Kentucky, Massachusetts, Maryland, Maine, Michigan, Missouri, North Carolina, Nebraska, New Hampshire, New York, Ohio, Oklahoma, Oregon, Pennsylvania, Texas, Utah, Virginia, Vermont, Washington, West Virginia, Wisconsin

The following chart combines the information contained in Sections 3.1 and 3.2. It summarizes the total for each status designation for all 18,600 rate areas in the respective states by their pooling status -- mandatory, optional or excluded -- as of December 31, 2008.



**Table 3-5**  
**Complete Summary of all Rate Areas by Status Designation**

<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory (M) (State)</i>	<i>Mandatory (M*) (Single SP)</i>	<i>Mandatory (M*) (State Single SP)</i>	<i>Optional (O)</i>	<i>Excluded (X)</i>	<i>Total</i>
AK					19	262	281
AL	63	67	6	19	102	53	310
AR	34		13		150	185	382
AZ	26		21		30	53	130
CA	437	83	17		153	49	739
CO	21	5	5		134	46	211
CT	70	19					89
DC	1						1
DE	8				22		30
FL	120	25	1		94	41	281
GA	73		6		122	159	360
HI	1				5		6
IA	70	52	39		383	273	817
ID	14	66	5	61			146
IL	212		41		497	235	985
IN	205	74	17		174	56	526
KS	50		36		196	292	574
KY	42	118	5	45	135	27	372
LA	54		7		146	71	278
MA	234	30				2	266
MD	112	53					165
ME	39	101	11		55	43	249
MI	205	112	9	14	227	67	634
MN	37		7		194	405	643
MO	137	377	21	186			721
MS	33		6		137	63	239
MT					120	140	260
NC	131	24	7		198	71	431
ND					71	229	300



<i>State</i>	<i>Mandatory (M)</i>	<i>Mandatory (M) (State)</i>	<i>Mandatory (M*) (Single SP)</i>	<i>Mandatory (M*) (State Single SP)</i>	<i>Optional (O)</i>	<i>Excluded (X)</i>	<i>Total</i>
NE	25	97	7	152	178		459
NH	32	92			14	11	149
NJ	187		1		21		209
NM	10		5		51	97	163
NV	21		4		38	33	96
NY	402	243	1	20	82		748
OH	360	157	12	18	136	56	739
OK	96	15	45		152	222	530
OR	35	103	1		46	69	254
PA	414	97	1		264		776
PR	48		1		36		85
RI	25						25
SC	81		26		89	44	240
SD					75	198	273
TN	103		6		166	66	341
TX	282	7	43		504	442	1,278
UT	19	9	5	1	40	64	138
VA	119	184			14	52	369
VT		101			1	39	141
WA	56	148	4	30	1		239
WI	110	221	18	122	131		602
WV	7	147		9	3	62	228
WY					54	38	92
<b>Grand Total</b>	<b>4,861</b>	<b>2,827</b>	<b>460</b>	<b>677</b>	<b>5,460</b>	<b>4,315</b>	<b>18,600</b>



## Section 4 - Aggregated Total by Pool of the Service Providers Participating in the Pooled Area

Following is a summary of the aggregated total by pool of the service providers participating in the pooled areas in 2008. There are 2,350 distinct service providers<sup>2</sup> participating in 14,285 distinct pooled areas in 243 NPA complexes<sup>3</sup> covering 52 jurisdictions -- 50 states, the District of Columbia, and Puerto Rico.

NPA Complex	State	Pooling Service Providers	Pooled Areas
201/551	NJ	44	22
202	DC	36	1
203	CT	33	32
205	AL	57	62
206	WA	43	5
207	ME	69	206
208	ID	67	146
209	CA	59	55
210	TX	31	1
212/347/646/ 718/917	NY	32	1
212/646/917	NY	46	2
213	CA	44	3
214/469/972	TX	53	43
215/267	PA	47	36
216	OH	30	4
217	IL	42	194
218	MN	31	58
219	IN	42	45

<sup>2</sup> Distinct Operating Company Numbers (OCNs) that have at least one assigned or retained block in PAS.

<sup>3</sup> The term "NPA Complex" is used because in some rate areas there are multiple NPAs serving one geographic area.

NPA Complex	State	Pooling Service Providers	Pooled Areas
224/847	IL	33	42
225	LA	30	34
228	MS	21	11
229	GA	27	30
231	MI	51	77
234/330	OH	67	105
239	FL	48	14
240/301	MD	79	63
248/947	MI	42	20
251	AL	49	37
252	NC	42	64
253	WA	29	13
254	TX	36	61
256	AL	54	91
260	IN	41	74
262	WI	52	60
269	MI	67	76
270	KY	54	170
276	VA	32	70
281/713/832	TX	47	45
302	DE	54	30
303/720	CO	58	16
304/681	WV	50	166
305	FL	26	1
305/786	FL	42	4
307	WY	21	54
308	NE	16	178
309	IL	28	84
310/424	CA	46	16
312	IL	37	1
313	MI	35	6
314	MO	29	7
315	NY	65	149
316	KS	25	14
317	IN	33	36



NPA Complex	State	Pooling Service Providers	Pooled Areas
318	LA	25	73
319	IA	24	91
320	MN	47	59
321	FL	26	5
321/407	FL	40	17
323	CA	41	12
325	TX	22	53
331/630	IL	32	25
334	AL	39	67
336	NC	64	76
337	LA	29	53
339/781	MA	32	40
347/718	NY	29	2
347/718/917	NY	38	10
351/978	MA	34	58
352	FL	51	45
360	WA	77	77
361	TX	29	60
386	FL	56	23
401	RI	23	21
402	NE	82	25
404/678	GA	46	281
405	OK	56	1
406	MT	22	82
408	CA	35	120
409	TX	41	11
410/443	MD	61	39
412/878	PA	32	102
413	MA	47	23
414	WI	24	61
415	CA	41	4
417	MO	35	14
419/567	OH	72	155
423	TN	58	161
425	WA	30	64
430/903	TX	68	14
432	TX	16	134
434	VA	42	26
435	UT	51	47

NPA Complex	State	Pooling Service Providers	Pooled Areas
440	OH	38	51
478	GA	33	62
479	AR	22	27
480	AZ	32	43
484/610	PA	86	1
501	AR	40	90
502	KY	46	51
503/971	OR	69	35
504	LA	27	56
505	NM	47	5
507	MN	45	27
508/774	MA	60	91
509	WA	61	85
510	CA	34	130
512	TX	52	13
513	OH	30	33
515	IA	56	25
516	NY	36	76
517	MI	76	11
518	NY	61	76
520	AZ	44	135
530	CA	63	27
540	VA	62	92
541	OR	48	92
559	CA	52	129
561	FL	37	57
562	CA	44	7
563	IA	20	9
570	PA	69	75
571/703	VA	43	180
573	MO	55	19
574	IN	32	216
575	NM	19	47
580	OK	39	39
585	NY	51	106
586	MI	34	77
601/769	MS	64	11
602	AZ	32	66
603	NH	66	1



NPA Complex	State	Pooling Service Providers	Pooled Areas
605	SD	16	138
606	KY	29	75
607	NY	44	98
608	WI	71	105
609	NJ	73	159
612	MN	43	39
614	OH	33	1
615	TN	35	16
616	MI	42	49
617/857	MA	36	36
618	IL	57	20
619	CA	40	195
620	KS	51	11
623	AZ	32	132
626	CA	43	1
631	NY	33	10
636	MO	31	53
641	IA	56	46
650	CA	33	148
651	MN	56	15
657/714	CA	42	32
660	MO	43	11
661	CA	52	13
662	MS	59	224
678/770	GA	76	32
682/817	TX	47	99
701	ND	29	41
702	NV	29	24
704/980	NC	71	71
706/762	GA	90	16
707	CA	65	52
708	IL	28	75
712	IA	55	75
715	WI	89	154
716	NY	57	253
717	PA	55	79
719	CO	51	107
724/878	PA	74	55
727	FL	35	162

NPA Complex	State	Pooling Service Providers	Pooled Areas
731	TN	27	5
732/848	NJ	38	56
734	MI	47	36
740	OH	66	33
754/954	FL	37	187
757	VA	39	16
760	CA	74	5
763	MN	48	34
765	IN	64	83
772	FL	69	11
773	IL	48	122
775	NV	38	8
779/815	IL	74	10
785	KS	50	47
787/939	PR	18	167
801	UT	54	106
802	VT	19	85
803	SC	75	102
804	VA	35	68
805	CA	69	55
806	TX	26	40
808	HI	28	58
810	MI	65	6
812	IN	59	47
813	FL	40	146
814	PA	48	8
816	MO	52	178
818	CA	44	73
828	NC	39	68
830	TX	53	77
831	CA	53	24
843	SC	59	70
845	NY	65	96
850	FL	36	48
856	NJ	54	32
858	CA	33	8
859	KY	49	42
860	CT	50	57
862/973	NJ	43	42



NPA Complex	State	Pooling Service Providers	Pooled Areas
863	FL	51	23
864	SC	48	58
865	TN	42	30
870	AR	38	103
901	TN	27	14
904	FL	42	18
906	MI	14	50
907	AK	5	19
908	NJ	38	38
909	CA	41	21
910	NC	34	64
912	GA	29	27
913	KS	41	30
914	NY	39	28
915	TX	25	6
916	CA	42	16
918	OK	55	120

NPA Complex	State	Pooling Service Providers	Pooled Areas
919	NC	58	36
920	WI	73	126
925	CA	30	17
928	AZ	37	47
931	TN	46	62
936	TX	38	41
937	OH	61	123
940	TX	61	60
941	FL	55	11
949	CA	38	7
951	CA	37	20
952	MN	44	7
956	TX	50	29
970	CO	31	94
979	TX	42	46
985	LA	50	42
989	MI	53	135



## Section 5 - Forecast Results and a Review of Forecasts versus Actual Block Activation in the Past

This section identifies forecast results by NPA, and specifically contains a review of forecasts compared to actual block assignments for the current year and the previous years.

In summary for 2008, there were:

- **243 NPA complexes;**
- **9,012 distinct rate areas with forecasts;**
- **116,843 forecasted blocks; and**
- **47,898 blocks assigned.**

### 5.1 Forecasted Versus Actual Block Assignments by NPA for 2008

Table 5-1 below shows that 116,843 blocks were forecasted and 47,898 blocks were assigned in 243 NPA complexes during the 2008 calendar year. A comparison of the number of forecasted blocks to the number of actual blocks assigned, shows that 41% of the forecasted blocks were assigned. Carriers forecasted a need for blocks in 9,012 rate areas out of the 14,285 pooling rate areas, or in 63% of them. Therefore, 5,273 pooling rate areas had no blocks forecasted during 2008. When compared with 2007, the number of blocks assigned increased 2% while the number of total forecasted blocks decreased 19% in 2008. The Michigan 906 NPA had the lowest percentage of blocks assigned compared to total forecast, at 11%, while the Louisiana 225 NPA had the highest compared percentage at 71%.

**Table 5-1  
Forecasted Versus Actual Block  
Assignments by NPA for 2008**

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
201/551	NJ	792	291	37%
202	DC	408	184	45%
203	CT	743	330	44%
205	AL	696	323	46%
206	WA	401	124	31%
207	ME	377	181	48%
208	ID	451	229	51%
209	CA	400	193	48%
210	TX	618	200	32%
212/347/ 646/718/ 917	NY	479	118	25%
212/646/ 917	NY	1185	405	34%
213	CA	232	128	55%
214/469/ 972	TX	1400	594	42%
215/267	PA	1154	574	50%
216	OH	215	55	26%
217	IL	511	166	32%
218	MN	206	92	45%
219	IN	340	153	45%
224/847	IL	1216	406	33%
225	LA	199	142	71%
228	MS	164	71	43%
229	GA	299	97	32%
231	MI	252	71	28%
234/330	OH	985	373	38%
239	FL	258	94	36%
240/301	MD	952	406	43%
248/947	MI	533	211	40%
251	AL	257	144	56%
252	NC	282	123	44%



<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>	<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
253	WA	321	97	30%	360	WA	531	175	33%
254	TX	186	93	50%	361	TX	301	142	47%
256	AL	559	252	45%	385/801	UT	577	253	44%
260	IN	234	144	62%	386	FL	336	147	44%
262	WI	419	203	48%	401	RI	293	159	54%
269	MI	403	122	30%	402	NE	478	258	54%
270	KY	304	141	46%	404/678	GA	535	249	47%
276	VA	194	102	53%	405	OK	525	252	48%
281/713/ 832	TX	1615	798	49%	406	MT	186	95	51%
302	DE	404	172	43%	408	CA	483	252	52%
303/720	CO	808	444	55%	409	TX	190	102	54%
304/681	WV	555	303	55%	410/443	MD	1130	488	43%
305	FL	88	40	45%	412/878	PA	430	195	45%
305/786	FL	616	276	45%	413	MA	591	224	38%
307	WY	113	76	67%	414	WI	402	229	57%
308	NE	79	31	39%	415	CA	327	155	47%
309	IL	329	106	32%	417	MO	376	136	36%
310/424	CA	814	313	38%	419/567	OH	941	317	34%
312	IL	458	201	44%	423	TN	393	223	57%
313	MI	530	194	37%	425	WA	339	127	37%
314	MO	575	222	39%	430/903	TX	471	220	47%
315	NY	572	261	46%	432	TX	155	72	46%
316	KS	239	77	32%	434	VA	252	116	46%
317	IN	539	224	42%	435	UT	188	76	40%
318	LA	351	208	59%	440	OH	594	194	33%
319	IA	173	79	46%	478	GA	216	76	35%
320	MN	167	100	60%	479	AR	245	92	38%
321	FL	205	56	27%	480	AZ	671	220	33%
321/407	FL	672	279	42%	484/610	PA	1056	520	49%
323	CA	885	438	49%	501	AR	287	123	43%
325	TX	132	66	50%	502	KY	335	146	44%
331/630	IL	767	309	40%	503/971	OR	619	289	47%
334	AL	408	197	48%	504	LA	305	126	41%
336	NC	446	207	46%	505	NM	478	204	43%
337	LA	248	123	50%	507	MN	185	93	50%
339/781	MA	463	235	51%	508/774	MA	1045	491	47%
347/718	NY	379	116	31%	509	WA	638	265	42%
347/718/ 917	NY	3014	809	27%	510	CA	378	173	46%
351/978	MA	689	314	46%	512	TX	672	286	43%
352	FL	435	210	48%	513	OH	491	151	31%
					515	IA	274	154	56%



<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>	<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
516	NY	486	163	34%	651	MN	748	144	19%
517	MI	437	141	32%	657/714	CA	856	350	41%
518	NY	599	250	42%	660	MO	203	73	36%
520	AZ	407	179	44%	661	CA	408	208	51%
530	CA	322	165	51%	662	MS	896	279	31%
540	VA	621	319	51%	678/770	GA	1456	523	36%
541	OR	637	309	49%	682/817	TX	717	279	39%
559	CA	356	180	51%	701	ND	117	55	47%
561	FL	336	122	36%	702	NV	683	305	45%
562	CA	422	197	47%	704/980	NC	754	403	53%
563	IA	95	36	38%	706/762	GA	655	228	35%
570	PA	752	277	37%	707	CA	379	175	46%
571/703	VA	896	382	43%	708	IL	607	214	35%
573	MO	679	201	30%	712	IA	144	67	47%
574	IN	259	134	52%	715	WI	224	111	50%
575	NM	594	107	18%	716	NY	527	200	38%
580	OK	248	126	51%	717	PA	600	276	46%
585	NY	399	167	42%	719	CO	293	157	54%
586	MI	223	84	38%	724/878	PA	589	285	48%
601/769	MS	592	264	45%	727	FL	357	125	35%
602	AZ	559	103	18%	731	TN	138	57	41%
603	NH	478	167	35%	732/848	NJ	854	289	34%
605	SD	117	78	67%	734	MI	367	101	28%
606	KY	151	62	41%	740	OH	743	271	36%
607	NY	228	76	33%	747/818	CA	589	280	48%
608	WI	325	160	49%	754/954	FL	481	204	42%
609	NJ	651	328	50%	757	VA	567	233	41%
612	MN	612	84	14%	760	CA	905	332	37%
614	OH	573	220	38%	763	MN	629	109	17%
615	TN	518	270	52%	765	IN	457	140	31%
616	MI	371	136	37%	772	FL	213	81	38%
617/857	MA	698	306	44%	773	IL	1105	495	45%
618	IL	567	136	24%	775	NV	232	123	53%
619	CA	478	187	39%	779/815	IL	707	287	41%
620	KS	275	112	41%	785	KS	439	199	45%
623	AZ	564	95	17%	787/939	PR	847	281	33%
626	CA	389	181	47%	802	VT	301	172	57%
631	NY	588	215	37%	803	SC	633	325	51%
636	MO	330	111	34%	804	VA	482	246	51%
641	IA	85	27	32%	805	CA	452	217	48%
650	CA	325	172	53%	806	TX	311	110	35%



<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
808	HI	301	94	31%
810	MI	351	126	36%
812	IN	477	165	35%
813	FL	613	266	43%
814	PA	600	238	40%
816	MO	472	130	28%
828	NC	298	167	56%
830	TX	196	93	47%
831	CA	189	79	42%
843	SC	568	267	47%
845	NY	612	222	36%
850	FL	471	179	38%
856	NJ	588	282	48%
858	CA	250	114	46%
859	KY	319	112	35%
860	CT	664	306	46%
862/973	NJ	977	378	39%
863	FL	345	140	41%
864	SC	501	306	61%
865	TN	297	185	62%
870	AR	264	88	33%
901	TN	228	118	52%
904	FL	490	221	45%
906	MI	118	13	11%
907	AK	59	32	54%
908	NJ	574	183	32%
909	CA	582	258	44%
910	NC	470	217	46%
912	GA	324	143	44%
913	KS	351	121	34%
914	NY	410	121	30%
915	TX	209	101	48%
916	CA	460	191	42%
918	OK	462	226	49%
919	NC	722	352	49%
920	WI	430	241	56%
925	CA	231	96	42%
928	AZ	326	90	28%
931	TN	277	145	52%
936	TX	150	52	35%
937	OH	671	221	33%

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
940	TX	160	62	39%
941	FL	243	107	44%
949	CA	351	176	50%
951	CA	446	173	39%
952	MN	608	81	13%
956	TX	621	239	38%
970	CO	359	195	54%
979	TX	160	83	52%
985	LA	286	141	49%
989	MI	493	143	29%
<b>Totals</b>	<b>243</b>	<b>116,843</b>	<b>47,898</b>	<b>41%</b>

**5.2 NPAs/States with Forecasted-Versus-Actual Blocks Assigned under 20%**

Table 5-2 below shows that there were eight NPA complex areas where fewer than 20% of the blocks forecasted were assigned 2008.

**Table 5-2  
NPAs/States with forecasted versus actual blocks assigned under 20%**

<i>NPA Complex</i>	<i>State</i>	<i>Blocks Fore-casted</i>	<i>Blocks Assigned</i>	<i>Percent Assigned</i>
906	MI	118	13	11%
952	MN	608	81	13%
612	MN	612	84	14%
623	AZ	564	95	17%
763	MN	629	109	17%
575	NM	594	107	18%
602	AZ	559	103	18%
651	MN	748	144	19%



### 5.3 NPA/States with Forecasted Versus Actual Blocks Assigned Above 50%

Table 5-3 below shows that there were 52 NPA areas where the ratio between blocks forecasted and blocks assigned was above 50% in 2008.

**Table 5-3**  
NPA/States with forecasted versus actual blocks assigned above 50%

NPA Complex	State	Blocks Fore-casted	Blocks Assigned	Percent Assigned
715	WI	224	111	50%
337	LA	248	123	50%
215/267	PA	1154	574	50%
254	TX	186	93	50%
325	TX	132	66	50%
949	CA	351	176	50%
507	MN	185	93	50%
609	NJ	651	328	50%
559	CA	356	180	51%
339/781	MA	463	235	51%
208	ID	451	229	51%
580	OK	248	126	51%
661	CA	408	208	51%
804	VA	482	246	51%
406	MT	186	95	51%
530	CA	322	165	51%
803	SC	633	325	51%
540	VA	621	319	51%
574	IN	259	134	52%
901	TN	228	118	52%
979	TX	160	83	52%
615	TN	518	270	52%
408	CA	483	252	52%
931	TN	277	145	52%
276	VA	194	102	53%

NPA Complex	State	Blocks Fore-casted	Blocks Assigned	Percent Assigned
650	CA	325	172	53%
775	NV	232	123	53%
704/980	NC	754	403	53%
719	CO	293	157	54%
409	TX	190	102	54%
402	NE	478	258	54%
907	AK	59	32	54%
401	RI	293	159	54%
970	CO	359	195	54%
304/681	WV	555	303	55%
303/720	CO	808	444	55%
213	CA	232	128	55%
251	AL	257	144	56%
828	NC	298	167	56%
920	WI	430	241	56%
515	IA	274	154	56%
423	TN	393	223	57%
414	WI	402	229	57%
802	VT	301	172	57%
318	LA	351	208	59%
320	MN	167	100	60%
864	SC	501	306	61%
260	IN	234	144	62%
865	TN	297	185	62%
605	SD	117	78	67%
307	WY	113	76	67%
225	LA	199	142	71%

### 5.4. Analysis of Forecasted Versus Actual Blocks Assigned Percentage Since 2004

As indicated below, for the five years since 2004, 2008 ranks second highest in the percentage of blocks forecasted that were actually assigned. Even though the actual blocks assigned were nearly the same in 2008 as in 2007, the total forecasted blocks dropped almost 19% from 2007.



The significance of the forecasting versus blocks assigned percentage disparity will typically be reflected in the PA's NRUF submission to NANPA which is based on service provider forecasts compared to the resources available in the pools. The NANPA uses these forecasts in calculating NPA exhaust projections.

Table 5-4 illustrates the comparison between forecasts and actual assigned blocks from 2004 through 2008, ranked from highest Percentage of Assigned-to-Forecasted Blocks to lowest.

**Table 5-4**  
**Analysis of forecasted versus actual blocks assigned percentage since 2004**

<b>Rank from highest to lowest</b>	<b>Year</b>	<b>Total Forecasted Blocks</b>	<b>Total Blocks Assigned</b>	<b>Percentage of Assigned/Forecasted Blocks</b>
1	2006	147,370	62,606	42.5
2	2008	116,843	47,898	41.0
3	2007	144,197	46,796	32.4
4	2005	197,878	55,990	28.3
5	2004	174,322	37,150	21.3



## Section 6 - System and Performance Metrics

### 6.1 Pooling Administration System (PAS) Performance in 2008

Table 6-1 summarizes PAS system performance in 2008.

**Table 6-1**  
Summary of PAS Performance in 2008

Month	Number of Possible Scheduled Available Hours	Number of Hours Available	Percent Scheduled Hours Available
Jan	744	744	100
Feb	646 <sup>4</sup>	672 hours and 15 minutes <sup>5</sup>	100
Mar	744	744	100
Apr	720	720	100
May	744	744	100
Jun	720	720	100
Jul	744	744	100
Aug	744	744	100
Sep	720	720	100
Oct	744	744	100
Nov	720	720	100
Dec	744	743 hours and 49 minutes	99.98

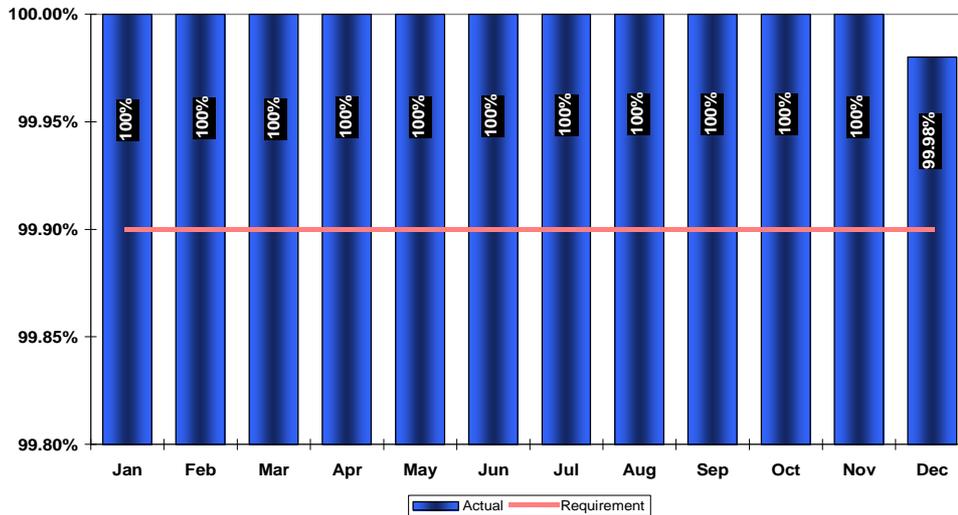
Figure 4 compares total PAS availability with the contract requirement of 99.9%.

<sup>4</sup> Of the 696 hours in February, 2008, the FCC approved 50 hours from the time the old PAS was closed down until the new PAS became functional. Therefore, the total number of possible scheduled available hours is 646.

<sup>5</sup> Although the FCC approved 50 hours for the migration to the new system, the migration took only 23 hours and 45 minutes.



**Total PAS System Availability for 2008  
January 01, 2008 - December 31, 2008 - 99.998%**



**Figure 4: Comparison of 2008 PAS Availability with the Contract Requirement**

PAS availability is extremely important to our customers. PAS had only one instance of unscheduled unavailability in 2008, which was for a total of eleven minutes. This downtime was caused by the failure of our internet service provider, not a PAS performance defect. As a result, **overall PAS availability to customers in 2008 was 99.998%, far exceeding the contract performance metric of 99.9%.**

This achievement is even more remarkable because in February, 2008, we delivered a completely new and enhanced PAS which continues the extraordinary reliability of the old PAS. Between March, 2002 and February 2008, overall reliability for the PAS was 99.98%. Since February 2008, the reliability of the new PAS has been **99.998%.**

In 2008, NeuStar requested and received approval from the FCC for one occurrence of scheduled PAS unavailability for scheduled maintenance<sup>6</sup> and as a result, PAS was unavailable to customers for a total of one hour and ten minutes. This means that **NeuStar used only 4.9% of the possible 24-hours of scheduled down time allowable by the contract.** (See Table 6-2)

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<sup>6</sup> This scheduled unavailability is separate and distinct from the PAS to the enhanced PAS migration in February which was a unique, contractual event not included in the final total.



**Table 6-2  
Summary of 2008 PAS Scheduled Unavailability**

<b>DATE OF SCHEDULED PAS DOWN TIME</b>	<b>PURPOSE</b>	<b>AMOUNT OF PAS DOWN TIME APPROVED BY FCC</b>	<b>AMOUNT OF ACTUAL PAS SCHEDULED UNAVAILABILITY</b>	<b>APPROVED DOWN TIME USED</b>
August 22	PAS Upgrades	4 hours	1 hour and 10 minutes	29%

### **6.2 PAS Performance Metrics**

In 2008, as outlined in Table 6-3, the PAS consistently exceeded the required performance metrics as set forth in Clause C.1, Section 5.0 of the Contract:

**Table 6-3  
PAS Performance Metrics**

<b>REQUIRED SERVICE</b>	<b>PERFORMANCE STANDARD</b>	<b>ACCEPTABLE QUALITY LEVEL</b>	<b>ACCOMPLISHMENT</b>
PAS Availability (See PWS 3.3)	Pooling Administration System is available	99.9%	<b>FAR EXCEEDED THE REQUIREMENT WITH ACTUAL AVAILABILITY LEVEL OF 99.998%</b>
Maintenance (See PWS 3.3)	Unscheduled maintenance of the PAS is less than 9 hours in any 12 month period	100%	<b>THERE WAS NO UNSCHEDULED MAINTENANCE OF THE PAS IN 2008.</b>
Maintenance (See PWS 3.3)	Scheduled maintenance of the PAS is less than 24 hours in any 12 month period	100%	<b>SCHEDULED MAINTENANCE DURING 2008 TOTALED ONLY ONE HOUR AND TEN MINUTES</b>



## **Section 7 - Status of Required Transferable Property**

NeuStar Pooling Administration Services affirms that all equipment defined in the annual inventory report required by the contract is considered transferable property, and is available for transfer upon direction from the FCC. The transferable property inventory report is updated, reviewed, and certified quarterly with the FCC Property Management Division and all transferable property is appropriately labeled with FCC asset tags.



## Section 8 - Industry Issue Identification/Feedback

The PA works with the industry through several channels during the year: participation in the North American Numbering Council (NANC) meetings, interaction with the Numbering Oversight Working Group (NOWG), and participation in industry forums. This section contains information on the industry forums the PA participated in, and the issues that the PA submitted, as well as the feedback the PA received from the NOWG for 2008.

### 8.1 North American Numbering Council (NANC)

NeuStar, as national PA, participated in the one meeting of the North American Numbering Council (NANC) in February, 2008 and reported on the status of thousands-block pooling administration and events affecting the performance of the PA. In addition, the PA, on its own initiative, provided a mid-year status report on July 29.

The PA also participated in one NANC subgroup -- the Future of Numbering (FoN) Working Group. The following describes this committee:

#### 8.1.1 Future of Numbering (FoN) Working Group

The NANC formed the Future of Numbering (FoN) in December 2004. The mission of this working group is to explore changes to the environment, including new and future technologies and the impact of market place and/or regulatory changes and innovations on telephone numbering. The group 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 PA attended all FoN working group meetings in 2008.

### 8.2 Industry Forums

As the national PA, our participation at industry forums includes:

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

The PA participated in the following industry forums in 2008:

- **Industry Numbering Committee (INC)** – the PA submitted twenty-three new issues and forty-five new contributions. Of the issues submitted in 2008, twenty were pooling-related (see Table 8-1) and three were related to p-ANI. (See Table 8-2). Of the contributions submitted in 2008, twenty-seven were pooling-related (see Table 8-3) and eighteen were related to p-ANI (see Table 8-4).
- **Network Routing Resources Information Committee (NRRIC)** – the PA participated in the NRRIC meetings. We continued to work with NRRIC on several issues, including: Issue 0264-Update the NIIF Mergers and Acquisitions Document,



Issue 0268- Update NIIF Part XIII Terms and Definitions Document, and Issue 0273- Re-home Procedures and LERG Effective Dates

- Common Interest Group on Rating and Routing (CIGRR)** – the PA participated in the CIGRR meetings. We continued to review the BCR no NXD and 3E validation reports prior to the reports being sent to the Administrative Operating Company Numbers (AOCNs). The BCRnoNXD and 3E report are monthly reports. When requested we also review the 3F report prior to the report being released to the AOCNs. We continue to address issues and concerns from participants (some resulting in INC issues).
- Local Number Portability Working Group (LNPA WG)** – the PA participated in LNPA WG meetings as a subject matter resource.
- Emergency Services Interconnection Forum (ESIF)** – the PA, as Interim p-ANI Administrator, began participating in the meetings in May, 2008 and has submitted six new incoming correspondences for discussion. (See Table 8-5) In October, Amy Putnam was named co-chair of the ESIF-ECDR (Emergency Call & Data Routing) subcommittee. (See Table 8-5)

**Table 8-1**  
**2008 Pooling INC Issues**

<b>INC Meeting Number</b>	<b>Issue Number</b>	<b>Supporting Contribution Number</b>	<b>Issue/Contribution Title</b>
INC 98	571	DMM-179	INC Form Changes to Synchronize with the Release of the new PAS
INC 98	572	LNPA-547	Update the TBPAAG to Reflect the TRD Requirement that the Part 1B Form not be Required for Pooled CO Code Requests
INC 98	573	LNPA-548	Handling Block Transfers when Blocks are in Reclamation
INC 98	574	LNPA-549	Update the Pooling Milestones to Include Supplemental Pooling
INC 99	580	LNPA-553	Clarification on Block Exchanges
INC 99	582	DMM-182	Update All References to Intra-Service Provider Ports in the TBPAAG and COCAG Appendix C to Match the Glossary Term
INC 99	583	LNPA-554	Update MTE Form to Clarify Excluded Numbers
INC 99	585	LNPA-555	Blocks with Over 10% Contamination
INC 99	586	LNPA-556	Add PSTN Acknowledgement to the Part 1A Form
INC 100	594	LNPA-557	Update to the Non-pooled Dedicated Customer Request Process
INC 101	599	LNPA-599	Updates to the block reservation process
INC 101	600	LNPA-560	Clarify voluntary return of over-contaminated blocks
INC 101	602	LNPA-564	Checking returned blocks in the NPAC



<b>INC Meeting Number</b>	<b>Issue Number</b>	<b>Supporting Contribution Number</b>	<b>Issue/Contribution Title</b>
INC 102	609	LNPA-565	Remove reference to the exceptions of the 75% utilization threshold
INC 102	610	LNPA-566	Update Reclamation direction in TBPAG
INC 103	614	LNPA-568	Handling Block Reservations in Jeopardy Situations
INC 103	615	LNPA-569	Updating TBPAG for Notifications for Rate Center Consolidations
INC 103	616	LNPA-570	Updating Section 7.4.3 of the TBPAG deleting reference to NXX codes
INC 103	617	LNPA-571	Update Assignment Practices in the TBPAG to Remove Tandem Homing ID References
INC 103	618	LNPA-572	Update Section 9.2.4 of the TBPAG removing language for returned blocks

**Table 8-2**  
**2008 p-ANI INC issues**

<b>INC Meeting Number</b>	<b>Issue Number</b>	<b>Supporting Contribution Number</b>	<b>Issue/Contribution Title</b>
INC 99	579	none	NPA Relief and p-ANI Resources
INC 99	584	CO/NXX-414-423	Updates to the p-ANI Guidelines
INC 100	596	none	Request to Set Aside a New NXX for p-ANI Administration

**Table 8-3**  
**2008 Pooling INC Contributions**

<b>INC Meeting # Presented</b>	<b>Contribution Number</b>	<b>Contribution Title</b>	<b>Issue Number/Title</b>
INC 98	DMM-179	INC Form Changes to Accommodate the Release of PAS	Issue 571: INC Form Changes to Synchronize with the Release of the new PAS
INC 98	LNPA-547	Update the TBPAG to Reflect the TRD Requirement that the Part 1B Form not be Required for Pooled CO Code Requests	Issue 572: Update the TBPAG to Reflect the TRD Requirement that the Part 1B Form not be Required for Pooled CO Code Requests
INC 98	LNPA-548	Handling Block Transfers when Blocks are in Reclamation	Issue 573: Handling Block Transfers when Blocks are in Reclamation



<b>INC Meeting # Presented</b>	<b>Contribution Number</b>	<b>Contribution Title</b>	<b>Issue Number/Title</b>
INC 98	LNPA-549	Update the Pooling Milestones to Include Supplemental Pooling	Issue 574: Update the Pooling Milestones to Include Supplemental Pooling
INC 99	LNPA-550	Update the TBPAG to Reflect the TRD Requirement that the Part 1B Form not be Required for Pooled CO Code Requests	Issue 572: Update the TBPAG to Reflect the TRD Requirement that the Part 1B Form not be Required for Pooled CO Code Requests
INC 99	LNPA-553	Clarification on Block Exchanges	Issue 580: Clarification on Block Exchanges
INC 99	DMM-182	Update All References to Intra-Service Provider Ports in the TBPAG and COCAG Appendix C to Match the Glossary Term	Issue 582: Update All References to Intra-Service Provider Ports in the TBPAG and COCAG Appendix C to Match the Glossary Term
INC 99	LNPA-554	Update MTE Form to Clarify Excluded Numbers	Issue 583: Update MTE Form to Clarify Excluded Numbers
INC 99	LNPA-555	Blocks with Over 10% Contamination	Issue 585: Blocks with Over 10% Contamination
INC 99	LNPA-556	Add PSTN Acknowledgement to the Part 1A Form	Issue 586: Add PSTN Acknowledgement to the Part 1A Form
INC 100	LNPA-557	Update to the Non-pooled Dedicated Customer Request Process	Issue 594: Update to the Non-pooled Dedicated Customer Request Process
INC 100	DMM-184	Updates to the TBPAG Regarding Intra-Service Provider Ports, Active/Pending Ports and BIRRDs View References	Issue 582: Update All References to Intra-Service Provider Ports in the TBPAG and COCAG Appendix C to Match the Glossary Term
INC 100	DMM-185	Update to COCAG Regarding Intra-Service Provider Ports, Active/Pending Ports and BIRRDs View References	Issue 582: Update All References to Intra-Service Provider Ports in the TBPAG and COCAG Appendix C to Match the Glossary Term
INC 100	DMM-186	Updates to COCAG Appendix C Regarding Intra-Service Provider Ports, Active/Pending Ports and BIRRDs View References	Issue 582: Update All References to Intra-Service Provider Ports in the TBPAG and COCAG Appendix C to Match the Glossary Term
INC 101	LNPA-560	Clarify voluntary return of over-contaminated blocks	Issue 600: Clarify voluntary return of over-contaminated blocks
INC 101	LNPA-599	Updates to the block	Issue 599: Updates to the block



INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
		reservation process	reservation process
INC 101	LNPA-559	Obtaining a new block holder on over-contaminated block returns	Issue 585: Blocks with Over 10% Contamination
INC 101	CONXX-434	Update TBPAG and Part 1A form for reduced NANPA processing time	Issue 591: Change Timeline of Part 1/Part 3 processing for NANPA
INC 102	LNPA-565	Remove reference to the exceptions of the 75% utilization threshold	Issue 609: Remove reference to the exceptions of the 75% utilization threshold
INC 102	LNPA- 566	Edits to section 9.0 of the TBPAG	Issue 610: Update Reclamation direction in TBPAG
INC 103	LNPA-564	Checking returned blocks in the NPAC	Issue 602: Checking returned block in the NPAC
INC 103	LNPA-568	Handling Block Reservations in Jeopardy Situations	Issue 614: Handling Block Reservations in Jeopardy Situations
INC 103	LNPA-569	Updating TBPAG for Notifications for Rate Center Consolidations	Issue 615: Updating TBPAG for Notifications for Rate Center Consolidations
INC 103	LNPA-571	Update Assignment Practices in the TBPAG to Remove Tandem Homing ID References	Issue617: Update Assignment Practices in the TBPAG to Remove Tandem Homing ID References
INC 103	LNPA-570	Updating Section 7.4.3 of the TBPAG deleting reference to NXX codes	Issue 616: Updating Section 7.4.3 of the TBPAG deleting reference to NXX codes
INC 103	LNPA-572	Update Section 9.2.4 of the TBPAG removing language for returned blocks	Issue 618: Update Section 9.2.4 of the TBPAG removing language for returned blocks
INC 103	CONXX - 446	Part 1B Field Updates with LRN Mass Modifications	Issue 592: Update TBPAG and COCAG for Mass Update Modifications

**Table 8-4  
2008 p-ANI INC Contributions**

INC Meeting # Presented	Contribution Number	Contribution Title	Issue Number/Title
INC 99	CO/NXX-414	Update p-ANI Forecast Process	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-415	Clarify the RNA Reporting Process and the RNA Appeals	Issue 584: Updates to the p-ANI Guidelines



<b>INC Meeting # Presented</b>	<b>Contribution Number</b>	<b>Contribution Title</b>	<b>Issue Number/Title</b>
		Report Data	
INC 99	CO/NXX-416	Updates to the Part 1 Form	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-417	Updates to the Part 3 Form	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-418	Update the p-ANI Guidelines for Consistent Language in Relation to Proprietary Information and Manual Forms	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-419	Update the p-ANI Guidelines to Clarify that the Pool Consists of Both NPA 211 and 511 numbers	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-420	Update the Process for p-ANI Assignees to Request an Extension on the Part 4: p-ANI Confirmation of In Use Form	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-421	Remove the Definition of E-9-1-1 System Service Providers	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-422	Transfers of p-ANIs When the p-ANI is in Reclamation	Issue 584: Updates to the p-ANI Guidelines
INC 99	CO/NXX-423	Clarify the p-ANI Transfer References in Section 3.0	Issue 584: Updates to the p-ANI Guidelines
INC 101	CONXX-430	Update to INC Attachment 1: Part 1 - p-ANI Application Form	Issue 584: Updates to the p-ANI Guidelines
INC 101	CONXX-431	Update to Part 4 and Reclamation Requirements	Issue 584: Updates to the p-ANI Guidelines
INC 101	CONXX-432	Update to Forecasting requirements	Issue 584: Updates to the p-ANI Guidelines
INC 101	CONXX-433	Update the term "ESIF Threshold" to "ESIF Formula"	Issue 584: Updates to the p-ANI Guidelines
INC 102	CONXX-437	Remove reference to six months In Use	Issue 584: Updates to the p-ANI Guidelines
INC 102	CONXX-438	Add endnote for FCC PSAP ID to Attachment 1: Part 1- p-ANI Application Form	Issue 584: Updates to the p-ANI Guidelines
INC 102	CONXX-439	Add the FCC PSAP ID to Attachment 2: Part 3 - RNA Response/Confirmation Form	Issue 584: Updates to the p-ANI Guidelines
INC 102	CONXX-440	Updates to the Appendix 2: p-ANI Annual Report	Issue 584: Updates to the p-ANI Guidelines



**Table 8-5  
ESIF Incoming Correspondence**

<b>Date</b>	<b>Issue</b>
6/13/08	Updates to INC Attachment 1: Part 1 – p-ANI Application Form
6/13/08	Part 4 and Reclamation Requirements
6/13/08	Forecasting Requirements
6/13/08	Routing Number Administrator (RNA) Reporting Requirements
9/25/08	Correspondence requesting determination for handling of non-dialable p-ANIs on and NPA split or overlay situation
9/29/08	Correspondence requesting whether industry and Public Service Answering Points (PSAPs) need advance notice when 211 or 511 NXXs are exhausted and 311 NXX is in use in any NPA.

### ***8.3 Working with the Numbering Oversight Working Group (NOWG)***

The Numbering Oversight Working Group (NOWG) is a working group of the NANC. The NOWG’s responsibilities with the PA include:

- Reviewing PA Change Orders and providing a recommendation to the FCC for the disposition of the proposed change order;
- Completing the annual performance review of the PA and providing it to the FCC;
- Conducting a monthly meeting with the PA to review the previous month’s performance.

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 input to the NOWG on any issues or questions that arise during the year. The entire PA management team meets with the NOWG to participate on the monthly calls and in the annual performance review process, including the operational review.

Each month in 2008, the NOWG and PA met via conference call to discuss the PA’s

performance during the previous month. The 2008 PA and the NOWG meeting dates were: January 24, February 14, March 25, April 17, May 22, June 12, July 17, August 14, September 24, October 15, November 13, and December 17.

Prior to each monthly meeting, the PA updates an agenda and then reviews the information with the NOWG during the meeting. The standing agenda items are:

- Rate centers with less than 6 months inventory based on forecast
- Number of rate centers with no blocks available with blocks forecasted within 6 months
- Number of codes opened for pool replenishment
  - Rate centers with blocks with a pending status
  - Applications – number of applications processed monthly (running 12 month total)
  - Number of Part 1s passed thru from PAS to NAS (running 12 month total)



- Percent of applications not processed within 7 calendar days
- Reasons that applications were not processed within 7 calendar days
- Percent of calls returned within one business day
- Formal complaints and corrective action plans to resolve complaints
- FCC and/or NANC News
- INC read out (initial closure and new issues)
- Interim and Permanent P-ANI
- Change orders
- Pooling-related activities
- Regulatory updates
- Customer focus
- Tracking log
- Next meeting
- Other items that do not fall into any of the above categories

- PA NOWG Issue List
- Change Order #1 Tracking Table (since July, 2008)

In all, the PA provided fifty-six reports to the NOWG for the monthly meetings in 2008.

Also in 2008, the NOWG completed the annual review of 2007 PA performance and rated the PA performance as “More Than Met” expectations by using the following inputs:

- 2007 Performance Feedback Survey from service providers and regulators,
- Written comments and reports,
- Annual Operational Review, and
- NOWG observations and interactions with the PA.

As a result of the 2007 PA annual operational review, which was held March 17-18 in our Concord, CA office, the NOWG made three suggestions for continuous improvement of pooling administration that the PA took under consideration. (See Table 8-6) The PA worked, and continues to work, cooperatively with the NOWG to make desired industry improvements while also meeting our contractual requirements.

In addition to the agenda items above, the PA provides the following other reports to the NOWG for the monthly meetings:

- NOWG Blocks Report Information Summary
- NOWG Summary Data

**Table 8-6**  
**NOWG Suggestions for PA improvements**

<b>NOWG Suggestion</b>	<b>PA Response</b>
Continue to proactively manage rate center inventories to ensure resources are available when needed.	As a result of concerns raised during the PA NOWG Operational Review in 2006, the PA brought an issue to INC (Issue 519) to address the pool replenishment process. INC discussed the issue and determined to modify the TBPAG. This resulted in our submission of Change Order 1 in November, 2007. Change Order 1 allows a split block/code request in cases where an SP or SP consultant is requesting individual thousands-blocks from the pool in areas where pool



NOWG Suggestion	PA Response
	replenishment is needed. This process was implemented in PAS on May 16, 2008, and the PA conducted training sessions on May 13 and 14 to review the updates with the users.
Continue customer focus.	The PA continued its customer focus while also maintaining its contractual requirements. The PA keeps a log of customer focus items that are shared with the NOWG monthly.
Consider process improvement suggestions provided by service providers and/or regulators in the survey comments.	A feasibility analysis is completed by the management team for each process improvement and PAS update suggestion. Many suggestions from service providers and/or regulators were built into the new PAS that was released February, 2008. In addition, we submitted Change Orders three and six in 2008 that contain nine additional SP suggestions.

The NOWG provides recommendations to the FCC on all PA change order proposals. In 2008, the NOWG recommended approval of all five change order proposals. For details on these change orders, see Section 2.3.2.

The PA provided suggested edits the NOWG survey for the 2008 performance which is scheduled to be distributed in January, 2009.

### 8.4 Formal Complaints

Pursuant to Section 2.9.4 of Clause C.1 of the CONTRACT FOR POOLING ADMINISTRATION SERVICES FOR THE FEDERAL COMMUNICATIONS COMMISSION, 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 2008, NeuStar, as national PA, received **no formal complaints**.

### 8.5 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 8-7 lists all of the Tip topics that were covered by month in 2008.

Table 8-7



### 2008 Tips of the Month

<b>Month</b>	<b>Topic</b>
January	Describes the New Service Provider Check List and where to find it on the website.
February	Explained that with the release of the enhanced PAS, that CO Code Part 1 forms will be filled out in PAS.
March	Outlines the thousands-block donation process per section 7.2.7 of the TBPAG, as well as helpful hints.
April	Explained how SPs should check the contamination level of their block preference prior to ordering the block.
May	Clarified how Section D of the Months to Exhaust and Utilization Certification Worksheet TN level should be filled out.
June	Explained the process for SPs who receive one of their own blocks back from the pool and want it activated in the NPAC.
July	Explained how SPs can update the contamination level of a block that they previously donated to the pool.
August	Outlined the process for submitting a modification request for an effective date change that needs NPAC notification.
September	Explained the CO Code Demand section of the new screen that was added to PAS to notify a user that is ordering more than one block in a rate center that needs pool replenishment.
October	Explained the PSTN confirmation process.
November	Reviewed the guidelines changes to Sections 9.1.5 and 9.2.7 outlining the process for returning blocks that are more than 10% contaminated.
December	Explained how to review the pool replenishment status screen when ordering a single block.



## Section 9 - Volume of Reports Produced in 2008 - Aggregated by Regulatory Agency, NANC, NANPA and Service Providers

This section provides the total number of non-standard reports sent to the FCC and state regulatory agencies (See *Section 9.1*) and the total number of non-standard reports provided to NANC, NANPA, and service providers (See *Section 9.2*).

### 9.1 Total Number of Non-Standard Reports Produced for FCC and State Regulatory Agencies

Regulatory agency	Total number of reports
FCC	103
State	1,870

The total number of reports above includes:

- FCC: CDRL and other contract reporting requirements, and *ad hoc* reports
- State regulators: daily application activity reports through February 8, 2008, pooling status, reclamation, educational sessions, and miscellaneous *ad hoc* reports.

### 9.2 Total Number of Non-Standard Reports Produced for NANC, NANPA and Service Providers

Group	Total number of reports
NANC	2
NANPA	52
Service Providers	87

The total number of reports above includes:

- NANC: Meeting report for February and mid-year update in July.
- NANPA: Reports for NANPA industry meetings and two NRUF-cycle reports.
- Service providers: Rate center change reports, implementation meeting reports, monthly meeting reports to the NOWG, and miscellaneous *ad hoc* reports.
- These totals do not include reports that were obtained directly from the Pooling Administration website and/or PAS by service providers and regulators.



## Section 10 - Trends in Pooling Since 2002

### Introduction

When NeuStar began administering number pooling trials in 1998, nearly every NPA was experiencing acceleration of exhaust dates and many required extraordinary jeopardy procedures<sup>7</sup> in order to maintain enough resources until relief.

In September, 1999, there were 73 NPAs in jeopardy. There are currently 26 NPAs in a jeopardy status and only three of these, Illinois 217, Kentucky 270, and Alabama 256, have been declared in jeopardy since the rollout of national thousands-block number pooling began in 2002.

In April, 2004, there were 56 NPA areas that were in an "active" NPA relief planning status according to the "NPA Relief Activity Status Report" on NANPA website. Currently, there are 50. This represents a 10% decrease in the number of NPAs undergoing NPA relief since the rollout of national pooling was completed.

While these developments may not be solely attributable to thousands-block number pooling, the PA estimates that 41,063 NXXs have been saved by pooling, which is the equivalent of more than 50 NPAs. (See Section 10.1 below for further details)

Since NeuStar 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 area designations as a result of OMB changes to the MSA lists, service providers voluntarily pooling in optional rate areas, implementation of additional delegated authority and regulatory enforcement. (See 10.4 for further details)

### 10.1 NXXs Saved by Pooling

Table 10-1 illustrates by NPA complex<sup>8</sup> the 41,063 NXXs that have been saved in 50 states and the District of Columbia and Puerto Rico with number pooling. NXXs were saved in all but one pooled NPA area, Alaska 907, and this is simply because there is limited participation in pooling in that NPA.

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<sup>7</sup> NANPA declares "jeopardy" in area codes for which the supply of NXXs could exhaust before relief can be provided

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<sup>8</sup> An NPA complex is one pooling area that is covered by more than one NPA, most often an overlay situation.



**Table 10-1  
NXXs Saved by Pooling**

<b>NPA Complex</b>	<b>State</b>	<b>Total of NXXs Saved</b>	<b>NPA Complex</b>	<b>State</b>	<b>Total of NXXs Saved</b>
201/551	NJ	260	303/720	CO	88
202	DC	19	304/681	WV	362
203	CT	208	305	FL	11
205	AL	128	305/786	FL	58
206	WA	32	307	WY	94
207	ME	363	308	NE	22
208	ID	177	309	IL	124
209	CA	262	310/424	CA	312
210	TX	18	312	IL	14
212/347/646/718/917	NY	36	313	MI	67
212/646/917	NY	24	314	MO	52
213	CA	55	315	NY	265
214/469/972	TX	230	316	KS	43
215/267	PA	345	317	IN	186
216	OH	35	318	LA	122
217	IL	247	319	IA	68
218	MN	150	320	MN	158
219	IN	162	321	FL	34
224/847	IL	444	321/407	FL	145
225	LA	70	323	CA	194
228	MS	52	325	TX	32
229	GA	68	331/630	IL	243
231	MI	268	334	AL	159
234/330	OH	362	336	NC	160
239	FL	73	337	LA	99
240/301	MD	425	339/781	MA	357
248/947	MI	258	347/718	NY	21
251	AL	63	347/718/917	NY	141
252	NC	147	351/978	MA	464
253	WA	80	352	FL	178
254	TX	43	360	WA	195
256	AL	167	361	TX	91
260	IN	169	386	FL	114
262	WI	233	401	RI	122
269	MI	285	402	NE	107
270	KY	152	404/678	GA	19
276	VA	76	405	OK	160
281/713/832	TX	224	406	MT	172
302	DE	125	408	CA	121



<b>NPA Complex</b>	<b>State</b>	<b>Total of NXXs Saved</b>
409	TX	59
410/443	MD	658
412/878	PA	226
413	MA	289
414	WI	29
415	CA	140
417	MO	202
419/567	OH	355
423	TN	157
425	WA	86
430/903	TX	126
432	TX	29
434	VA	76
435	UT	116
440	OH	184
478	GA	51
479	AR	50
480	AZ	14
484/610	PA	559
501	AR	77
502	KY	64
503/971	OR	155
504	LA	24
505	NM	97
507	MN	164
508/774	MA	748
509	WA	239
510	CA	156
512	TX	113
513	OH	84
515	IA	102
516	NY	108
517	MI	227
518	NY	254
520	AZ	60
530	CA	386
540	VA	216
541	OR	271
559	CA	216
561	FL	106
562	CA	113
563	IA	41

<b>NPA Complex</b>	<b>State</b>	<b>Total of NXXs Saved</b>
570	PA	296
571/703	VA	139
573	MO	294
574	IN	130
575	NM	84
580	OK	129
585	NY	220
586	MI	116
601/769	MS	164
602	AZ	13
603	NH	593
605	SD	32
606	KY	86
607	NY	88
608	WI	117
609	NJ	345
612	MN	17
614	OH	120
615	TN	163
616	MI	233
617/857	MA	211
618	IL	281
619	CA	117
620	KS	157
623	AZ	11
626	CA	153
631	NY	360
636	MO	170
641	IA	87
650	CA	157
651	MN	62
657/714	CA	225
660	MO	118
661	CA	214
662	MS	317
678/770	GA	217
682/817	TX	166
701	ND	38
702	NV	34
704/980	NC	280
706/762	GA	183
707	CA	377



NPA Complex	State	Total of NXXs Saved
708	IL	292
712	IA	68
715	WI	101
716	NY	228
717	PA	252
719	CO	97
724/878	PA	600
727	FL	73
731	TN	119
732/848	NJ	453
734	MI	273
740	OH	316
754/954	FL	74
757	VA	128
760	CA	509
763	MN	34
765	IN	197
772	FL	111
773	IL	95
775	NV	110
779/815	IL	418
785	KS	177
787/939	PR	66
801	UT	188
802	VT	253
803	SC	170
804	VA	159
805	CA	374
806	TX	39
808	HI	34
810	MI	230
812	IN	198
813	FL	117
814	PA	264
816	MO	132
818	CA	271
828	NC	158
830	TX	94
831	CA	132
843	SC	186
845	NY	394
850	FL	136

NPA Complex	State	Total of NXXs Saved
856	NJ	308
858	CA	103
859	KY	87
860	CT	265
862/973	NJ	478
863	FL	123
864	SC	223
865	TN	116
870	AR	117
901	TN	41
904	FL	123
906	MI	60
907	AK	0
908	NJ	267
909	CA	265
910	NC	210
912	GA	70
913	KS	60
914	NY	185
915	TX	22
916	CA	148
918	OK	142
919	NC	197
920	WI	276
925	CA	170
928	AZ	75
931	TN	174
936	TX	38
937	OH	297
940	TX	57
941	FL	103
949	CA	110
951	CA	271
952	MN	28
956	TX	123
970	CO	266
979	TX	62
985	LA	155
989	MI	278
<b>Grand Total</b>		<b>41,063</b>



## 10.2 Trends in Thousands-Block Number Pooling

This section contains summaries of thousands-block number pooling statistics since the beginning of national pooling in 2002.

### 10.2.1 Statistics

The following tables and figures contain pooling statistics that illustrate the productivity trends of the PA between 2002

and 2008. Table 10-2 illustrates NXXs opened for LRNs, NXXs opened for dedicated customers, NXXs opened for pool replenishment, blocks assigned by the PAS during that year, total assigned blocks in the PAS at year end and total applications processed at year end (Part 3s). Figures 5 through 10 are graphic representations of each individual category.

**Table 10-2**  
**Pooling Statistics from 2002 through 2008 At-A-Glance**

	<b>2002 Statistics</b>	<b>2003 Statistics</b>	<b>2004 Statistics</b>	<b>2005 Statistics</b>	<b>2006 Statistics</b>	<b>2007 Statistics</b>	<b>2008 Statistics</b>
NXXs Opened for LRNs	206	475	787	945	968	689	879
NXXs Opened for Dedicated Customers	37	98	258	135	128	178	137
NXXs Opened for Pool Replenishment	194	240	933	1,305	2,006	1,802	1,555
Blocks Assigned by PA During Year	8,141	21,613	36,936	55,990	62,606	46,796	47,898
Total Assigned Blocks in PAS at Year End	10,023	29,027	61,118	109,420	162,234	190,721	229,336
Applications Processed	13,942	42,177	69,472	102,304	127,965	115,982	108,835

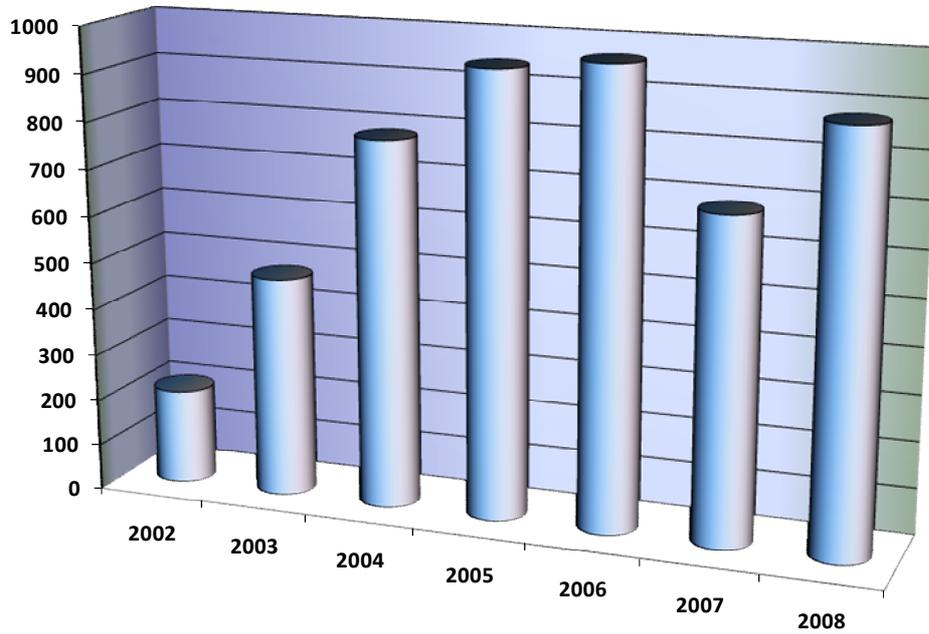


Figure 5: CO Codes Opened for LRNs from 2002 through 2008

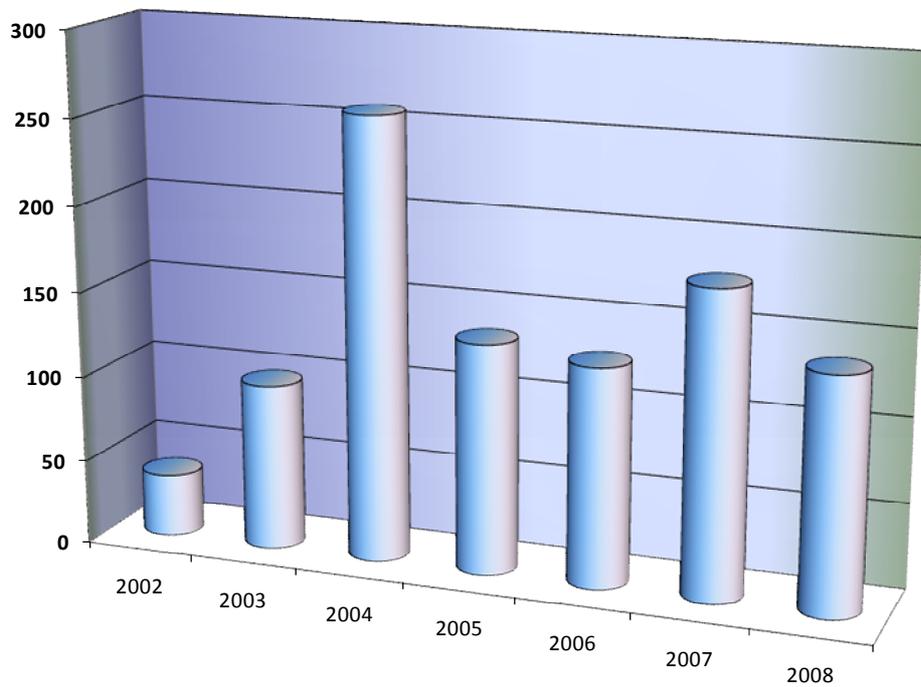


Figure 6: CO Codes Opened for Dedicated Customers from 2002 through 2008

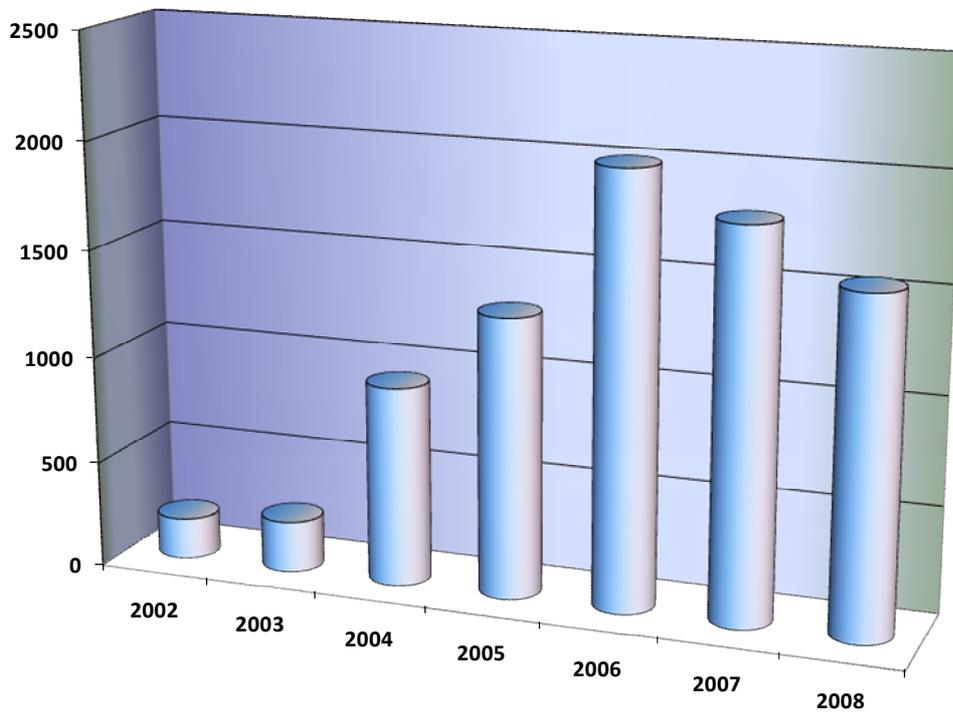


Figure 7: CO Codes Opened for Pool Replenishment from 2002 through 2008

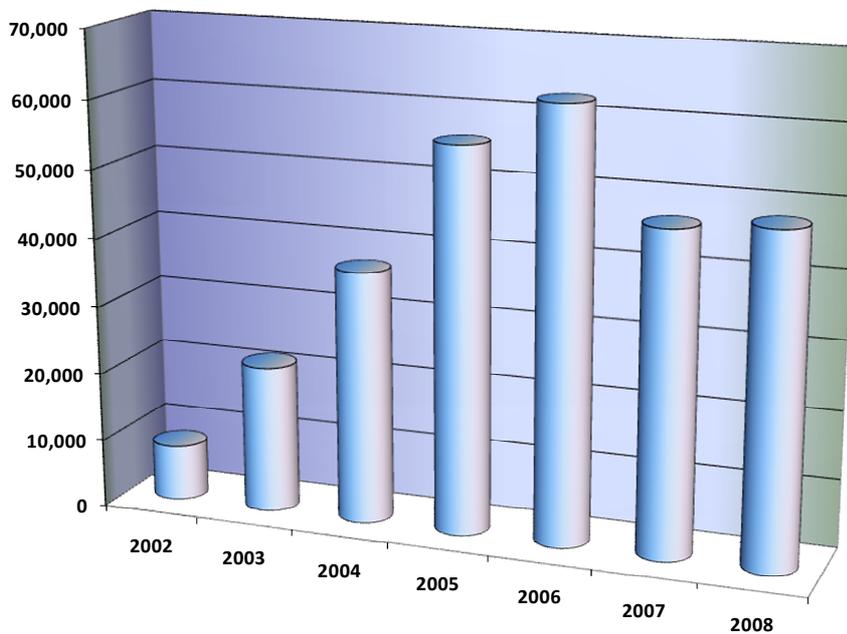


Figure 8: Blocks Assigned During Years 2002 through 2008

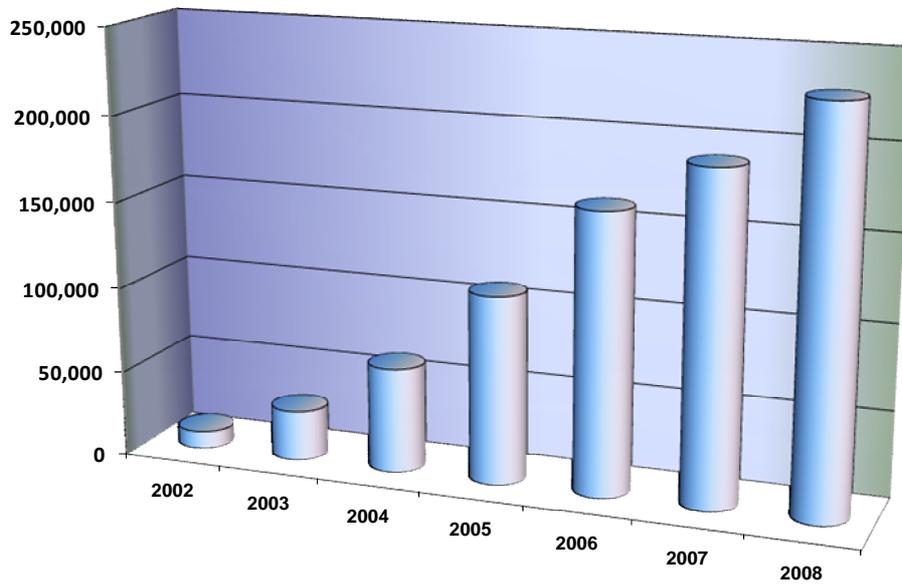


Figure 9: Assigned Blocks in PAS at the End of Years 2002 through 2008

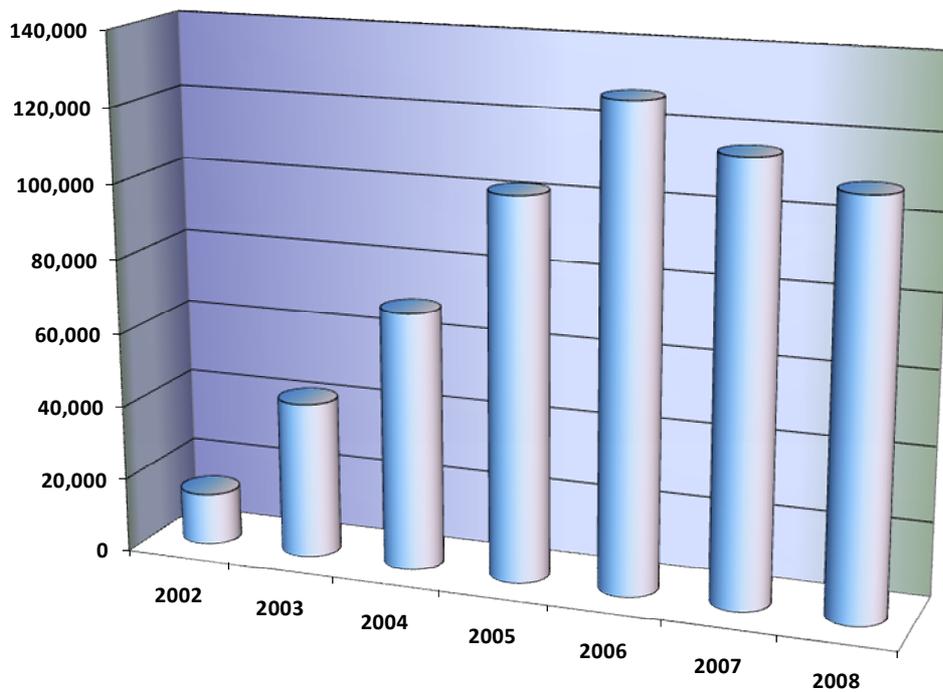


Figure 10: Applications (Part 3s) Processed from 2002 through 2008



### 10.2.2 Total Applications Processed (Part 3s) from 2002 through 2008

The total number of applications (Part 3s) processed is the best measure of the actual work performed by the pooling administrators, because not every Part 3 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 NANPA action and some are withdrawn or denied entirely.

The following tables and figures illustrate the total numbers of Part 3s processed since national pooling began in March 2002.

**Table 10-3**  
**Total Applications Processed from 2002 through 2008**

<b>Month</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Jan	N/A	2,484	4,591	7,324	11,439	7,732	7,365
Feb	N/A	2,339	4,872	9,062	10,001	9,472	10,356
Mar	461	2,819	5,585	9,878	10,150	11,112	13,868
Apr	845	3,336	5,177	9,363	7,588	11,801	7,631
May	960	3,022	4,628	9,776	9,501	12,044	8,506
Jun	1,130	3,100	5,771	9,792	15,737	10,110	5,965
Jul	932	4,102	5,551	8,022	9,590	10,171	6,071
Aug	1,335	3,698	6,002	9,666	17,778	12,468	13,968
Sep	1,454	5,115	6,547	7,520	9,319	9,228	7,267
Oct	1,359	4,471	7,891	6,970	8,831	9,488	8,819
Nov	3,564	3,692	6,470	7,648	10,826	5,967	12,524
Dec	1,902	3,999	6,387	7,283	7,205	6,389	6,495
<b>TOTAL</b>	<b>13,942</b>	<b>42,177</b>	<b>69,472</b>	<b>102,304</b>	<b>127,965</b>	<b>115,982</b>	<b>108,835</b>

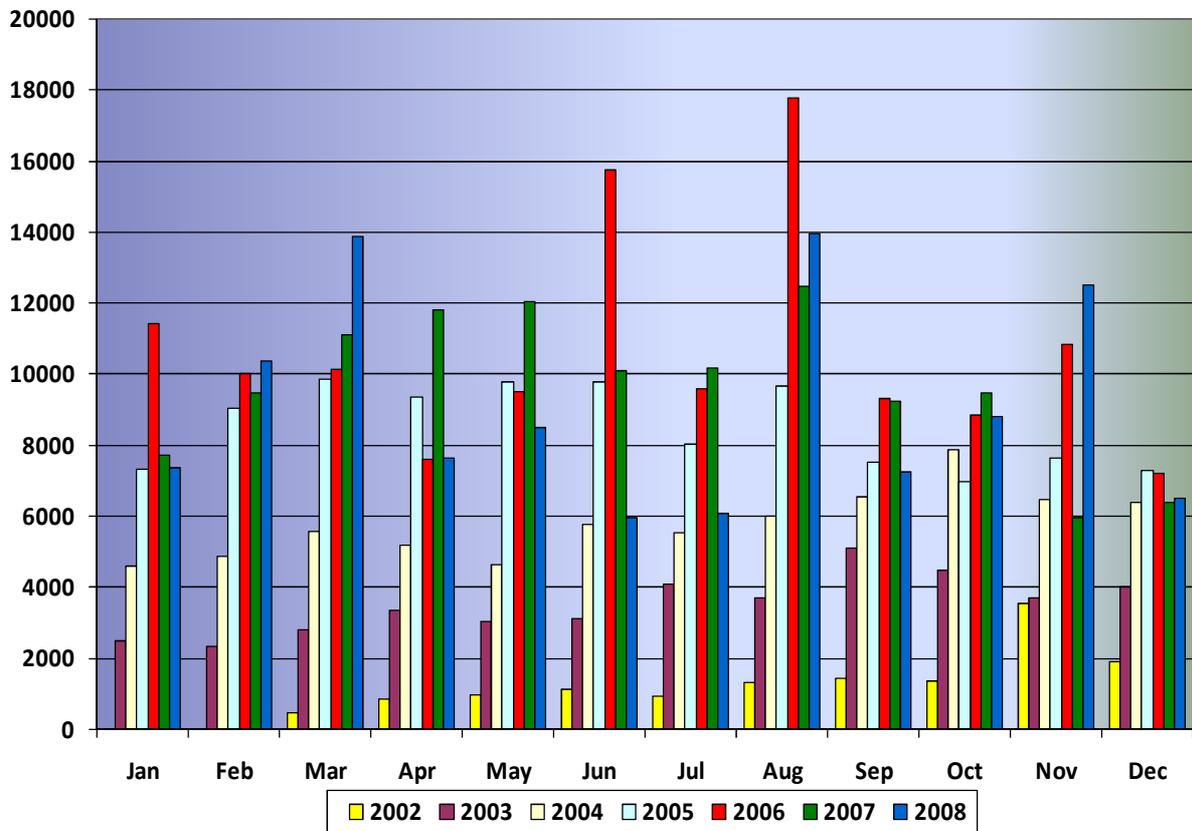


Figure 11: Total Applications Processed by Month from 2002 through 2008



### 10.2.3 Cumulative Thousands Blocks Assigned Since 2002

Figure 12 below illustrates the cumulative number of total blocks assigned since 2002.

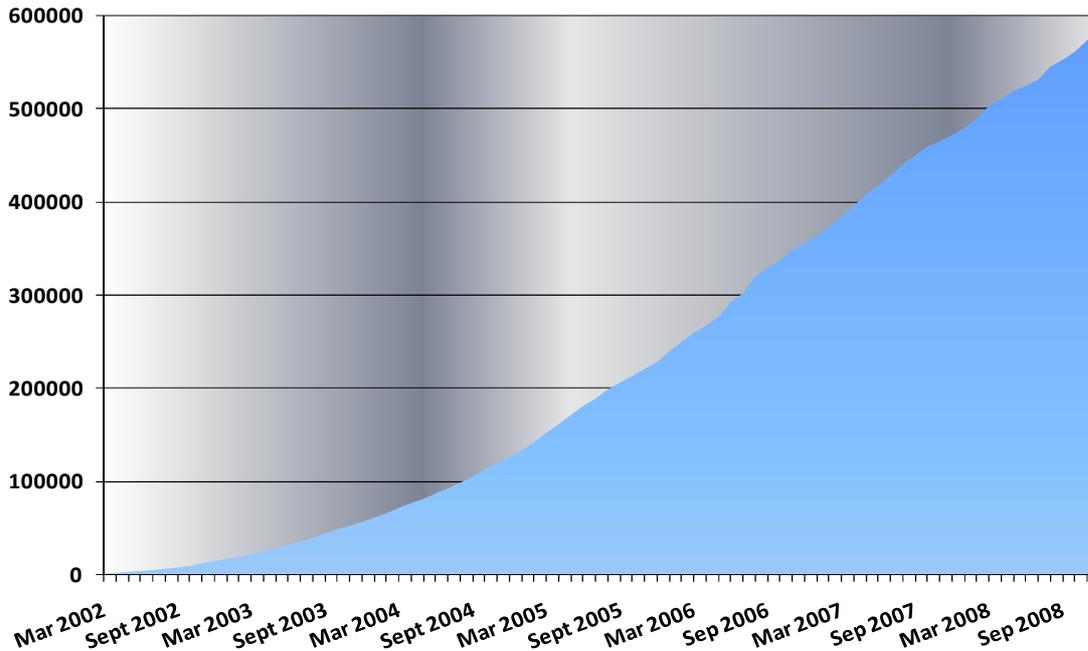


Figure 12: Cumulative Thousands Blocks Assigned Since March 2002

### 10.3 Trends in Thousands-Block Pooling By State and NPA Since 2002

During the past five years, the PA has processed a significant number of applications and assigned a considerable number of blocks. The tables below identify the states and NPAs with the highest activity levels for applications, assignments, and reclamation.

Table 10-4  
Top 10 States/NPAs with the Highest Total Number of Applications since 2002 (Part 3s)

State / NPA	Total Applications
NY / 347	7,613
CA / 909	5,943
NY / 646	5,536
CA / 310	5,188
CA / 714	5,056
NH / 603	4,677
NC / 704	4,507



State / NPA	Total Applications
PA / 724	4,392
CA / 323	4,378
NY / 845	4,326

**Table 10-5**  
**Ten States with the Highest Number of Applications since 2002 (Part 3s)**

State	Total Applications
CA	71,373
NY	44,962
TX	40,821
FL	32,828
IL	28,520
PA	28,416
MI	22,403
NJ	20,379
OH	18,800
MA	18,128

**Table 10-6**  
**Ten States/NPAs with the Highest Total Number of Block Assignments since 2002**

State / NPA	Total Blocks Assigned
NY / 347	4,193
CA / 909	3,142
NY / 646	2,952
CA / 310	2,706
CA / 323	2,520
CA / 714	2,519
IL / 773	2,451
GA / 678	2,400
TX / 832	2,389
MA / 508	2,332

**Table 10-7**  
**Ten States with the Highest Number of Block Assignments since 2002**

State	Total Blocks Assigned
CA	38,516
NY	23,599
TX	21,770



FL	17,026
IL	14,912
PA	14,365
NJ	10,589
MI	10,423
MA	9,825
OH	9,482

**Table 10-8**  
**Reclamation between 2002 and 2008**

STATE	TOTAL NUMBER OF BLOCKS RECLAIMED
INDIANA	54
CALIFORNIA	39
NEW YORK	34
TEXAS	33
OREGON	32
MICHIGAN	28
PENNSYLVANIA	26
NEW HAMPSHIRE	26
FLORIDA	18
MISSISSIPPI	17
NEW JERSEY	17
WEST VIRGINIA	16
VERMONT	15
NEW MEXICO	13
WASHINGTON	12
COLORADO	12
IDAHO	9
ARIZONA	8
OHIO	8

STATE	TOTAL NUMBER OF BLOCKS RECLAIMED
ILLINOIS	8
ALABAMA	7
DELAWARE	5
TENNESSEE	5
ARKANSAS	4
KANSAS	4
OKLAHOMA	3
VIRGINIA	3
GEORGIA	2
IOWA	2
PUERTO RICO	1
CONNECTICUT	1
<b>TOTAL</b>	<b>462</b>

#### 10.4. Summary of Pooled Areas since 2002

##### 10.4.1 Aggregated Pooled Areas from 2002 through 2008

Table 10-9 represents a summary of the aggregated total of the number of pooling areas, those designated as mandatory or optional, as well as the number of the service

providers participating in the pooled areas since 2002. Since the first year of pooling, the total number of rate areas in pooling has increased **117%**, from 6,578 at the end of 2002 to 14,285 at the end of 2008, and the number of service providers has increased 103%, from 1,159 at the end of 2002 to 2,350 at the end of 2008.



Table 10-9  
 Aggregated Total of the Number of Service Providers and Pooled Areas

YEAR	TOTAL NUMBER OF DISTINCT POOLING SERVICE PROVIDERS	POOLED AREAS
2002	1,159	6,578
2003	1,631	13,322
2004	1,608	12,448
2005	1,745	13,168
2006	1,955	13,639
2007	2,200	14,015
2008	2,350	14,285

#### 10.4.2 Total Pooling versus Total Excluded Rate Areas from 2002 through 2008

Figure 13 illustrates how the number of pooling rate centers has increased and the number of excluded rate centers has decreased from 2002 through 2008.

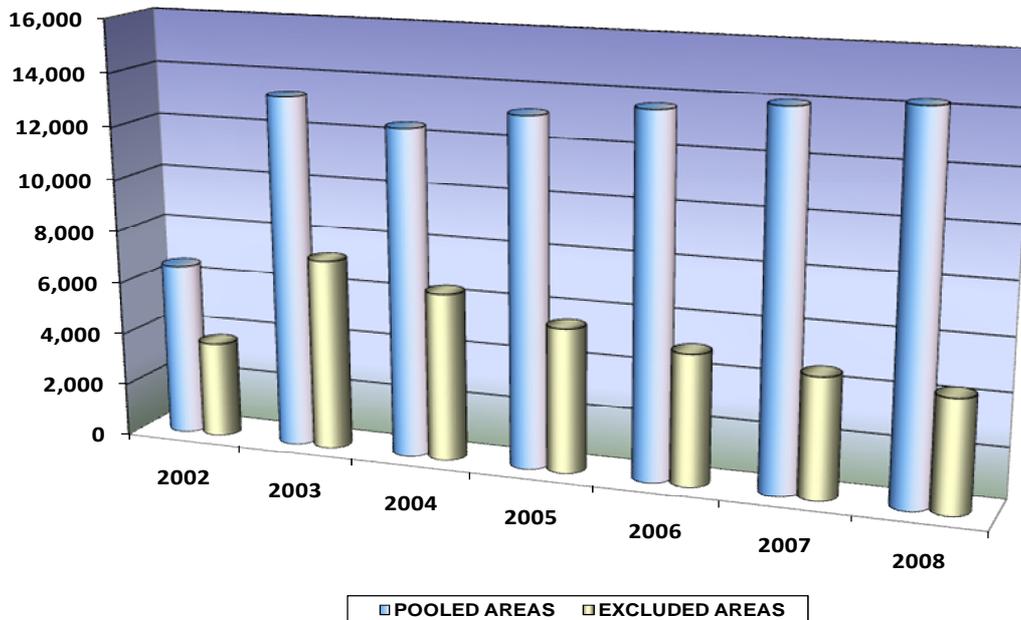


Figure 13: Total Pooling versus Total Excluded Rate Areas from 2002 through 2008



### 10.4.3 Total Number of Distinct Pooling Service Providers from 2002 through 2008

Figure 14 illustrates how the total number of distinct service providers that participate in pooling has changed between 2002 and 2008.

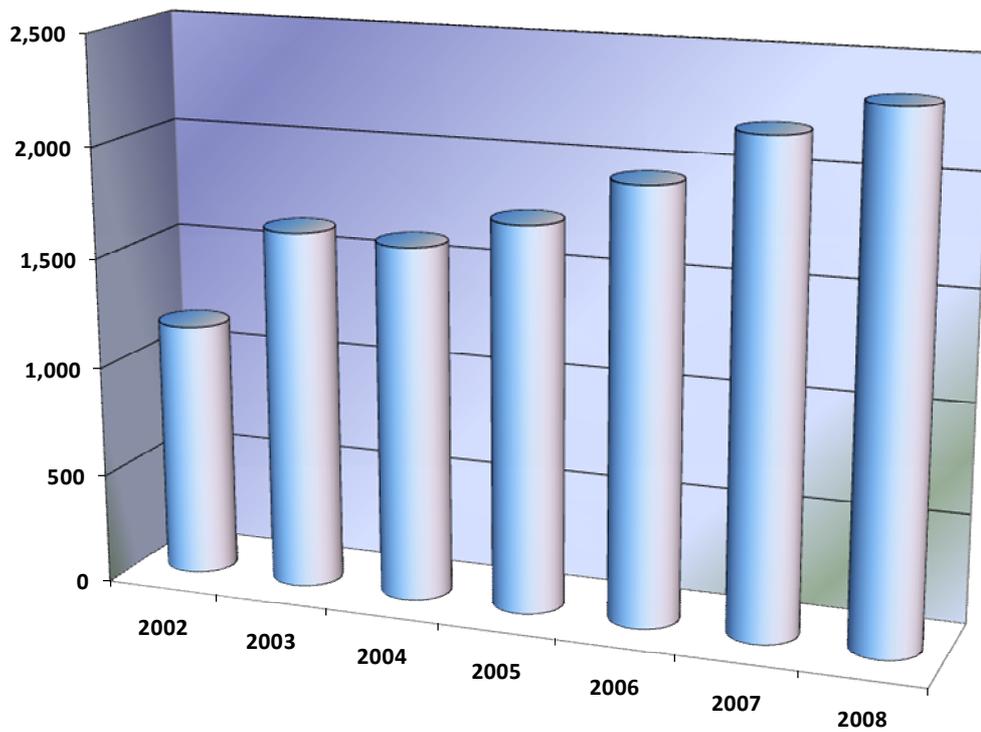


Figure 14: Total Number of Distinct Pooling Service Providers from 2002 through 2008