



1200 G Street, NW
Suite 500
Washington, DC 20005

P: 202-628-6380
F: 202-393-5453
W: www.atis.org

September 21, 2011

Chairman
John Donovan
AT&T

David Screven
Assistant Counsel
Pennsylvania Public Utility Commission

First Vice Chairman
Nick Adamo
Cisco Systems

Christopher Hepburn
Financial Analyst
Pennsylvania Public Utility Commission

Second Vice Chairman
Thomas Sawanobori
Verizon

RE: Pennsylvania Public Utility Commission's June 17, 2010 Request for Changes to the INC Guidelines

Treasurer
Joseph Hanley
Telephone and Data
Systems

Dear Mr. Screven and Mr. Hepburn:

President & Chief
Executive Officer
Susan M. Miller
ATIS

The Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC) would like to take the opportunity to respond to your written request dated June 17, 2010, regarding INC's numbering guidelines. ATIS INC supports the need for number conservation and appreciates the Pennsylvania Public Utility Commission's (PUC's) involvement in conserving Numbering Plan Areas (NPAs) in Pennsylvania. Below is a response to the specific items outlined in your June 17, 2010 request.

Vice President of
Finance & Operations
William J. Klein
ATIS

As an initial matter, it should be noted that while some of the concerns outlined in your request have been addressed in recent ATIS INC issues and or addressed with you at recent meetings, some concerns could not be address because INC considered the issues as outside of its scope of activities or as requiring governmental action.

- A. *The allocation and assignment of NXX codes*
1. *Processing Timeframe*

ATIS INC has clarified that Issue 591: *Change Timeline for Part 1/Part 3 Processing for NANPA* did not change the processing time for the assignment of blocks. The Pooling Administrator (PA) has seven (7) calendar days to respond to a service provider's application.

In July 2010, ATIS INC accepted Issue 698: *Auto-Populate Total Numbering Resources on TBPAG MTE Form*. Some states had indicated they would need less time to review service provider applications if the system automatically populated the total numbering resources. While the auto-population concept was thoroughly discussed, it was ultimately rejected. Instead, INC reached consensus

on creating a new Total Numbering Resources Report that will be available for viewing or downloading in Pooling Administration System (PAS) by the service provider and/or authorized state commission staff for that particular state. Issue 698 is now in Initial Pending status, as its implementation is contingent on the approval of PA Change Order 22 and North American Numbering Plan Administration (NANPA) Change Order 22, both of which were submitted to the FCC on August 5, 2011. For further details, please see <http://www.atis.org/inc/Docs/iss/iss698.doc>.

In June 2011, ATIS INC accepted Issue 714: *Consider Revisions to Administrator Application Processing Timeframes & State Approval of Applications*. This issue addresses your suggestion to change the PA's application processing time from seven calendar days to seven business days, and your belief that no request should be approved without first receiving approval from the appropriate state commission. Issue 714 is now in Initial Closure, and is expected to go to Final Closure on September 23, 2011. For further details, please see <http://www.atis.org/inc/Docs/iss/iss714.doc>.

2. *Multiple Operating Company Numbers (OCNs)*

As you are aware, after thorough discussions, ATIS INC declined to require service providers to combine resources from multiple OCNs for a given months-to-exhaust form and also declined to make the acquisition and use of Combined Entity Company Codes (CECCs) mandatory.

In August 2010, ATIS INC accepted Issue 691: *Requesting NXX and NXX-X after a Merger/Acquisition*, and the issue is now in Final Closure. The resolution of this issue added language to the guidelines which gives guidance to service providers on updating OCNs on codes and blocks after a merger or acquisition and updating the company name on an existing OCN. The *ATIS Codes for Identification of Service Providers for Information Exchange* (ATIS-0300251) and *ATIS Next Generation Interconnection Interoperability Forum (NGIIF), Mergers and Acquisitions* (ATIS-0300099) documents were footnoted in the guidelines for reference. For further details, please see <http://www.atis.org/inc/Docs/iss/iss691.doc>.

In March 2011, ATIS INC accepted Issue 710: *NANC Action Item "Multi-OCN Issue."* INC agreed to have the parent company OCN added to the NANP Administration System (NAS)/PAS reports that are provided to the states. Language was added to the guidelines which gives the states guidance to provide written direction and supporting documentation to the NANPA and the PA to deny numbering resources to an applicant when the state is aware that the applicant's jurisdictional certification or license has been revoked. Issue 710 is now in Initial Pending status, as its implementation is contingent on the approval of PA Change Order 21 and NANPA Change Order 21, both of which were submitted to the FCC on August 5, 2011. For further details, please see <http://www.atis.org/inc/Docs/iss/iss710.doc>.

3. *Use of Thousands Blocks for Local Routing Numbers (LRNs)*

In August 2010, ATIS INC accepted Issue 697: *Voluntary Code Transfers for LRN Purposes When Feasible*. The resolution of this issue outlines steps in the guidelines by which a service provider can request a voluntary code transfer from another service provider to meet an LRN need, and the code holder may transfer the code if it is feasible. For further details, please see <http://www.atis.org/inc/Docs/iss/iss697.doc>.

INC is not able to address your request for thousands-block assignment for LRN purposes. The LRN architecture was established by the FCC and cannot be changed by INC. Moreover, changes to the 6-digit routing architecture of the public switched telephone network (PSTN) would require upgrades or replacements to every switch in the PSTN.

4. *Dedicated code assignments*

In April 2009, ATIS INC accepted Issue 632: *Updates to the Dedicated Code sections in both the TBPAG and COCAG*. The resolution of this issue adds language detailing the steps needed to return blocks to the pool from a previously dedicated code. This issue is now in Final Closure. For further details, please see <http://www.atis.org/inc/Docs/iss/iss632.doc>.

In June 2010, INC accepted Issue 685: *Evidence of Dedicated Customer for CO Code Assignment in a Pooling Environment*. The Issue would add a requirement to the guidelines that a service provider provide documentation from the customer, on that customer's letterhead, of the need for 10,000 consecutive numbers to the PA along with the dedicated code request. This issue is now in Final Closure. For further details, please see <http://www.atis.org/inc/Docs/iss/iss685.doc>.

In August 2010, INC accepted Issue 693: *SP Periodic Review of Inventory to Maintain Six Month Supply*. The resolution of this issue adds language to the guidelines reminding a service provider that it may maintain no more than a six-month inventory in each rate center in which the provider offers service, and requiring service providers to review their inventories for possible code or block returns/donations semi-annually. Further, the resolution of Issue 693 reminds providers to return any NXX or block that is no longer needed for the purpose for which it was assigned. This issue is now in Final Closure. For further details, please see <http://www.atis.org/inc/Docs/iss/iss693.doc>.

5. *Activation of Numbering Resources*

In August 2010, ATIS INC accepted Issue 696: *Clarifying the Definition of "In Service" in the Guidelines*. In this issue, INC clarified the definition of "In Service" by specifying that numbers categorized as Administrative, Aging, Intermediate, Reserved, or Available cannot also be categorized as Assigned and do not satisfy the In Service requirement. However, INC declined to require service providers to indicate the quantity of numbers assigned within a code or block on a Part 4, as one assigned number satisfies the In Service requirement. If the PUC feels the blocks or codes are not being fully utilized by the SPs, then an audit could be requested to determine if

returns should be made by the SP. This issue is now in Final Closure. For further details, please see <http://www.atis.org/inc/Docs/iss/iss698.doc>.

- B. *Numbering Resource and Forecast Reporting*
 - 1. *Intermediate Numbers and Intermediate Carriers*

ATIS INC discussed this matter during its June 2010 meeting. INC referenced the North American Numbering Council's request to the FCC in January 2003 that the FCC establish a rulemaking proceeding to further clarify Intermediate numbers. To date, no clarification has been made by the FCC. To the extent that concerns remain, INC recommends that the PUC bring these concerns directly to the FCC's Wireline Competition Bureau for further guidance.

- 2. *Forecasting*

ATIS INC discussed this issue during its June 2010 meeting and suggestions were presented to assist PUC staff in attendance in understanding the service providers' perspective. A NANPA representative at that meeting noted that the Numbering Resource Utilization/Forecast (NRUF) 502 form has validation checks for any forecasted amount over 50 blocks in a given rate center for a given year. In PAS, if the forecast exceeds 25 blocks, a warning message appears so that the service provider may make modifications at that time, if needed. The INC members agreed that excessive forecasting for the purposes of driving the need for unnecessary pool replenishment has a negative impact on the entire industry by accelerating NPA exhaust.

- 3. *Failure to timely submit NRUF reports*

ATIS INC discussed this at its June 2010 meeting. If there are concern(s) with an SP NRUF submission, the NANPA will contact the service provider who will have five business days to respond. If the provider's response does not satisfy the NANPA's concern(s), the NANPA will forward the information to the appropriate state commission, and the NANPA and PA will withhold the assignment of resources until the state commission has resolved all questions regarding the discrepancies.

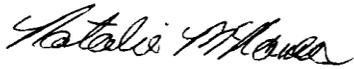
In November 2010, the resolution of Issue 611: *Augmenting the NRUF Verification Procedures* was implemented. NAS now systematically confirms that the assigned code and block data is being submitted by a service provider on its NRUF. There are reports available to service providers to view and resolve discrepancies prior to NRUF submissions.

- 4. *Reclamation Procedures*

INC discussed this at its June 2010 meeting and, as previously noted, in August 2010 INC accepted Issue 693: *SP Periodic Review of Inventory to Maintain Six Month Supply*. This issue is now in Final Closure. For further details, please see <http://www.atis.org/inc/Docs/iss/iss693.doc>.

INC appreciates the PUC's interest in the industry guidelines and number conservation, and appreciates your participation in the discussions of these concerns. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Natalie McNamer".

Natalie McNamer

INC Chairwoman

CC: Dana Crandall, INC Vice Chair, Dana.Crandall@verizonwireless.com
Jean-Paul Emard, INC Director, jpemard@atis.org
Paul Savitz, INC Administrator, psavitz@atis.org
Thomas Goode, ATIS General Counsel, tgoode@atis.org

