

**North American Numbering Council
Meeting Transcript
July 16, 2009 (Final)**

I. Time and Place of Meeting. The North American Numbering Council (NANC) held a meeting commencing at 9:30 a.m., at the Federal Communications Commission, 445 12th Street, S.W., TW-C305, Washington, D. C.

II. List of Attendees.

Voting Council Members:

- | | |
|-------------------------|-----------------------------------|
| 1. Thomas M. Koutsky | Chairman |
| 2. Henry Hultquist | AT&T, Inc. |
| 3. Cindy Sheehan | Comcast Corporation |
| 4. Karen Reidy | CompTel |
| 5. José Jimenez | Cox Communications, Inc. |
| 6. Matthew Gerst | CTIA – The Wireless Association |
| 7. David Greenhaus | 800 Response Information Services |
| 8. Jeffrey S. Lanning | Embarq Corporation |
| 9. Gregory L. Rogers | Level 3 Communications, LLC |
| 10. Hon. Betty Ann Kane | NARUC – District of Columbia |
| 11. Don Gray | NARUC – Nebraska |
| 12. Jerome Candelaria | NCTA |
| 13. John McHugh | OPASTCO |
| 14. Mary Retka | Qwest |
| 15. Rosemary Emmer | Sprint Nextel |
| 16. Anna Miller | T-Mobile USA, Inc. |
| 17. Thomas Soroka, Jr. | USTA |
| 18. Kevin Green | Verizon |
| 19. Brendan Kasper | Vonage |

Special Members (Non-voting):

- | | |
|-----------------|-----------------|
| John Manning | NANPA |
| Amy Putnam | PA |
| Faith Marcotte | Welch & Company |
| Jean-Paul Emard | ATIS |

Commission Employees:

Marilyn Jones, Designated Federal Officer (DFO)
Deborah Blue, Special Assistant to the DFO
Ann Stevens, Deputy Chief, Competition Policy Division
Michelle Sclater, Alternate DFO, Competition Policy Division
Gary Remondino, Competition Policy Division
Sanford Williams, Competition Policy Division

III. Estimate of Public Attendance. Approximately 30 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) NANC Meeting Transcript – February 22, 2008
- (3) North American Numbering Plan Administration (NANPA) Report to the NANC
- (4) National Thousands Block Pooling Administrator Report to the NANC
- (5) Numbering Oversight Working Group (NOWG) Report
- (6) Preliminary 2008 PA Performance Evaluation Report
- (7) Preliminary 2008 NANPA Performance Evaluation Report
- (8) North American Portability Management (NAPM) LLC Report
- (9) Telcordia Dispute Resolution Team: Schedule for Consideration
- (10) Industry Numbering Committee (INC) Report to the NANC
- (11) Billing and Collection Agent Report
- (12) Billing and Collection Working Group (B&C WG) Report to the NANC
- (13) Future of Numbering (FoN) Working Group Report to the NANC
- (14) Local Number Portability Administration (LNPA) Working Group Status Report to the NANC
- (15) Local Number Portability Efforts Presented to the NANC by the Alliance for Telecommunications Industry Solutions' (ATIS) Ordering and Billing Forum (OBF)

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VI. Summary of the Meeting.

CHAIRMAN KOUTSKY: Welcome to the July 16, 2009 meeting of the North American Numbering Council, and I appreciate everybody showing up here and getting to some of the business that is actually overdue in many ways. And I appreciate everybody's patience in terms of settling this meeting and getting

everything all straightened out.

Hopefully, I believe we've turned a corner in terms of things that NANC is going to be considering this year. There's a lot that we'll learn about in the afternoon that the FCC has actually given the NANC to take the bull by the horns regarding porting intervals and several other matters that are very important so I am glad to see that we've got good attendance.

And I'd like to express my appreciation again to the co-chairs who have actually been doing a lot of work, to many NANC members seemingly behind the scenes but it's actually quite important, you know either monthly, biweekly, you know, quarterly, touch preparations and I do wish to reach out my personal thanks to all of them that have been working very hard during our extended break.

ANNOUNCEMENTS AND RECENT NEWS

I guess I'll do this now. We actually have Sara Buyak from the Missouri Public Service Commission who has been nominated as an alternate representative of the Missouri Commission. She's back in the corner sitting by Don Gray. She has not been approved. I have actually asked her and allowed her to sit at the table because it would be kind of silly to be sitting in the back of the table.

I would just like to note for the record that she's actually not been approved, and I think we're going to use her performance today as judgment as to whether or not we shall approve her.

(LAUGHTER)

No, not exactly. Make sure you use complete sentences and don't split

infinitives when speaking.

But actually in reality, you know, I've encouraged her to participate. I'd just like to note at the beginning for the record that to the extent that we do have deliberations, you know, as a non-official member she will officially be abstaining so I'm going to say this now so she doesn't have to say that every time. But I'm glad that she's here, and I look forward to her contributions going forward on the Council.

APPROVAL OF MEETING TRANSCRIPT

So with that out of the way, I believe the first order of business that we have is the approval of the transcript from last year's meeting which is the really big thick document.

I've forgotten, Debbie, do we call these exhibits to this meeting or is it something completely different? I believe we do not. Okay, the agenda is marked as Exhibit 1 to this meeting, but do we mark the transcript as an exhibit too? Okay, so we'll mark the transcript as Exhibit 2.

Adam Newman was so kind to have read it for us. I have a few edits that he has suggested, just the INC section. So for the record I will read it out, and I'll make these notes to the transcript.

Beginning on page 38, I'm not entirely sure about this edit. There is an extra E in Telcordia to this. I see, okay. There's a typo in the eighth line, Telcordia is misspelled. We apologize. It's actually Telcordia as opposed to Telecordia. So that's one.

Page 43, in a quote by Anna Miller, cell sites, it's cell sites, not cell phytes in

the second line of her paragraph so that is line 14, it's cell cites. Although I think I might use that in the future, cell phytes.

There's an unnamed male speaker on page 45 in which this is interesting because Adam thinks it's Mike Altschul as the unknown speaker, and I think he's correct so even though Mike Altschul is not here to defend himself we're going to call him the unknown male speaker. In fact, I remember this exchange oddly enough so it was Mike.

Page 47 and 49, the unknown male speaker on page 47 is Adam Newman, so it would be Mr. Newman. And on page 49, also again Mr. Newman is the male speaker.

Page 55, line seven on page 55, instead of referring to Paul and Michael it would be Paul and Meisha, M-E-I-S-H-A. So Meisha instead of Michael, strike Michael and replace it with Meisha.

And finally page 64, in the first paragraph by Mr. Newman there is a word they -- I actually don't see that change. No, I don't see that change. Let's leave that one because I actually don't see it right now, but it is a typographical change. So with those in mind, do we have any other edits or suggestions for the transcript that people recall?

Hearing none I guess we will consider that transcript approved as Exhibit 2 and just for those that don't recall, we actually do the transcript rather than minutes of the meeting just to avoid having to have another document to go over. So that transcript will be entered into the record, and it will actually go into our Annual

Report as well.

REPORT OF THE NORTH AMERICAN NUMBERING PLAN

ADMINISTRATOR (NANPA)

Now we have John Manning with the report of the North American Numbering Plan Administrator and if you could just let people know that they're looking at the right document John since I may have centered on the wrong one.

MR. MANNING: The document you have in front of you titled Report to the NANC, July 15, 2009. The one that was sent out is the actual monthly report that you get on a regular basis from NANPA and this would be Exhibit 3.

Good morning, everybody. This morning what I want to do is kind of bring you up to speed on where we are with the various NANP resources, NANPA administrators, a mid year status update. Talk about some of the activities that are going on with (Unintelligible) planning, just to break up data on some change orders and some other miscellaneous items.

Let me note that NANPA has put out a previous report dated April of 2009, that's on the NANC Chair website and what this report does is kind of pick up from where that report left off.

So we begin on page two, update on central office code activity. The chart at the top of the page gives you a rundown of the quantity of central office code assignments, denials, returns, reclamations, as well as net assignments for the first half of 2009. It compares that for the first half of '06, '07 and '08.

The first obvious thing is you see a general decrease in CO code assignments

over the first half of the year. That decrease continues through 2009. That's both for overall assignments as well as net assignments.

The number of denials also continues to trend a little bit downward. Returns, reclamations increased slightly compared with the first half of '08 and again net assignments first half of '09 is actually below 1000 codes.

Just as an informational item, for the first half of '09, the most active state we've seen in terms of CO code assignments has been in Pennsylvania where we've seen a large quantity of CO codes assigned in that particular state.

On the other hand Iowa has been very active in terms of returning codes. Iowa and Alaska lead the way in terms of code returns.

Still talking a little bit about the code assignments in administration, we have implemented in May '09, a change to the NANPA administration system where we introduced something called part four delinquent notice. This is in response to an INC issue 613.

And what we do now is NANPA will now send a notice to the service provider if no part four has been received. The part four is the in service confirmation sent by the service provider to NANPA. If that part four notice is not received within six months of the original code effective date, and that notice essentially tells the service provider that when they go to submit that part four in the future they need to submit it to the appropriate regulatory authority.

Just for an informational item, NANPA will continue to send a reminder notice five months after the original code effective date to remind the service

provider that they need to submit the part four.

Any change on central office code activity or events with regard to administration of codes?

Okay, page three, the chart just gives you an inventory of where we are in area code assignments. Two area codes were assigned in the first half of '09, NPA 938 was assigned to relieve for the Alabama NPA 256 and NPA 849 was assigned to relieve the Dominican Republic 809/829.

We've had three NPAs go into service in the first half of this year. NPA 681 in West Virginia, the 385 area code in Utah, and 747 out in California. I just make a note here, on July 1st the NPA 849 actually was effective in the Dominican Republic and we have also just recently assigned NPA 531 to relieve Nebraska 402.

The next page or so deals with area code relief planning. A couple items, Illinois 773 is an area code that we've got a close eye on because the way this one is structured, events happen once we've assigned the last central office code which has taken place.

On June 25th we notified that Illinois Commerce Commission that the 773 NPA was expected to exhaust in the next 30 days. We have now assigned all 773 central office codes so the process is underway with regard to the implementation of the relief code for 773. Expectation will now be a little over 90 days before we start seeing the new area code in 773 and that is an overlay of 773 as well as 312.

California 760, they started permissive dialing for the overlay there and the introduction of 442 in May of this year. Mandatory dialings in October.

In Connecticut we started permissive seven ten digit dialing in May as well as for the 203 overlay. Mandatory dialing will start in November and this is one where the Commission actually ordered permissive ten digit dialing in the adjacent area code there in Connecticut.

And Oregon 541, permissive dialing of seven ten digits just started July 12th. Mandatory dialing is January 10, 2010. This is overlay of 501 with a 458 area code.

You can see there are other relief activities here. We've had a couple activities in Arkansas and 814 in Pennsylvania where the industry is recommending an overlay. The Kentucky split has been delayed again due to the forecast of exhaust. I've provided you the new dates there.

Wisconsin has an overlay of 715 plan with a permissive dialing starting -- permissive seven ten digit dialing starting October '09 and mandatory dialing in July 2010.

Alabama which I mentioned previously has permissive seven digit -- ten digit dialing starting in November of this year and then we have mandatory dialing in June of next year and we're just underway with 570 and relief activity. That area code actually was declared to be in jeopardy back in April.

And finally on the area code update, you recall there was the approval to allow St. Martin to join the NANP and that approval was something we shared some time ago with the NANC. We're still awaiting an implementation plan from St. Martin with regard to the new area code that they will be assigned once we get an implementation plan.

Any questions on area codes? Question, Jerome?

MR. CANDELARIA: Jerome Candelaria, NCTA. I just had a question about the Connecticut area code that you described. You mentioned that in the adjacent area code, mandatory ten digit dialing was being implemented as well. Is that what I heard you say?

MR. MANNING: It's a mandatory or permissive seven ten digit as well. I'd have to check. I can't recall.

MR. CANDELARIA: It's an adjacent area code?

MR. MANNING: Yeah, 806 I believe is the adjacent area code. They're implemented at a minimum permissive seven ten digit dialing. I can't recall, maybe Natalie can. Go ahead, Natalie.

MS. MCNAMER: Natalie McNamer, T-Mobile. I'm a co-chair on that Relief Planning Committee, and it is going to be mandatory ten digit dialing statewide. Even though they are only doing an overlay for 203 at this time, 860 will be like 18 months out.

MR. CANDELARIA: Follow-up question. I thought I heard you say this is another mandatory ten digit implementation and then adjacent area code. My question would be have you heard of this occurring in another area code, that is mandatory ten digit dialing implemented in an adjacent area code, in an area code that's not being relieved?

MR. MANNING: Let me follow-up. My mind tells me something's out there that's done this similar to this but I cannot recall right now.

CHAIRMAN KOUTSKY: Just one thing for questions. Rosemary, I know you had a question. I forgot to mention at the beginning what I like to do is people kind of signal with their little sign as a way of holding your hand up so that way I can kind of keep track of who might have a question, and you don't have to sit there with your hand up in the air. So we'll just try to do that. And also just remember to speak into the microphone so we can get a good transcript and we don't have to start attributing things to Mike Altschul again. Rosemary had a question.

MS. EMMER: Rosemary Emmer, Sprint Nextel, and I actually had a question about the document itself. I haven't seen it in e-mail yet and I just wanted to make sure that we were going to get it at some point. I don't have a hard copy.

MR. MANNING: Yeah, that's my mistake. I actually sent the wrong document out. So yes, I believe the document is already posted, is that right John?

MALE SPEAKER: Yes, it is.

MR. MANNING: So I apologize, that was my mistake. I mistakenly forwarded the wrong document in my e-mail (unintelligible).

Moving along to the other resources that NANPA administers (unintelligible) carrier identification codes. We have made no assignments the first half of '09 and reclaimed eight of those codes.

On the (unintelligible) D side we've made 37 assignments but actually made 37 reclamations and on the 500 side we've made 62 assignments with 15 codes that have been reclaimed.

With regard to 500, we had previously forecasted the exhaust of this resource

would be the second quarter of '09. We're now in the third quarter and we still have 500 resources available.

Based upon the forecast information that we were provided back with the NRUF cycle for the February 1, 2009 NRUF cycle, forecasts still indicated that demand was greater than the supply that we had in 500 so we would be exhausting the 500 resource.

We are now in the next NRUF cycle. We'll take another look at the forecast provided by service providers to determine if we think we still expect this resource to exhaust some time this year.

Just as a reminder, the NPA 533 is a relief area code and according to industry agreement we will start assignments of 533 NXX codes only after all 500 NXX codes available for assignment have been assigned.

On the 900 area code side, there have been no assignments and no codes have been returned or reclaimed, and on 555 number assignments we've assigned 28 new 555 line numbers and 15 numbers have been reclaimed.

The other resources I mentioned, the (unintelligible) NPA 456 vertical service codes ANI digits and N11 codes, no assignments for those resources.

Any questions on the other resources?

Okay, there is one outstanding change order, change order 18. This change order has been submitted to the FCC. This particular change order is requesting that NANPA take NRUF data and specifically looking at block data that would be block utilization data provided by service providers, to do a check to make sure using block

data provided by the Pooling Administrator that service providers that have been assigned blocks have indeed reported utilization on those blocks.

It also would be a check to see if a carrier who has reported a block has donated whether or not they're reporting on that particular block, any utilization on that particular donated block.

So this change order is taking some processes that are in place today that we use for codes and moving it forward and looking at block information as well.

Again this particular change order is pending with FCC.

And we have received permission to move forward with updating some support agreements with NANPA administration system hardware and software and we're moving forward with that as we speak to insure that all appropriate hardware and software support agreements are in place that are expected to expire at the end of this month.

CHAIRMAN KOUTSKY: John, I have a quick question. I didn't follow my own rule, sorry.

On change order 18, to what extent was the industry consulted on the requested change order, and maybe describe that process.

MR. MANNING: This is actually an INC issue that came up. I'm struggling with the number. I believe it's 611. INC issue 611 that this issue was introduced. They reached a resolution in following the normal processes when we see something that's going to have an impact on either NANPA operations and/or the system, we put forth the change order.

The change order was socialized with the NOWG which has responded back to the FCC already indicating they would support that change order. So all information necessary and all processes have been completed. The only outstanding item is to get a response from the FCC.

CHAIRMAN KOUTSKY: Okay, I wanted to get that clear. Yes, Natalie.

MS. MCNAMER: Natalie McNamer, T-Mobile. The NOWG's recommendation on that change order was for the FCC to approve it but not to approve it at this time until a new NANPA contract was entered into because it's going to take two NRUF cycles which is one year for implementation, and we had a fear that they would start working on it and the NANPA would be going through the RFP process and all that, making changes to the system at that time.

CHAIRMAN KOUTSKY: Okay, so would it be fair to say that there's general industry support for the idea but that it should be done as part of the new NANPA contract?

MS. MCNAMER: Exactly, or after the new contract was implemented or some way through that process.

CHAIRMAN KOUTSKY: Okay, I'd like to make that clear. Chairman Kane.

CHAIRMAN KANE: I had an issue. I'm not sure it's related to this or to bring it up under the Thousands Block Pooling issue, which was brought to our attention by one of the state members that couldn't be here which has to do with intermediate numbers and reporting on those.

I mean the concern is, and some of it's confidential so I won't name the state or the carrier that's involved, but it may be a more generic issue that intermediate numbers as I understand them are numbers that are service providers who provide numbers to other service providers for assignment to an end user that get reported as intermediate.

And this particular state is looking at the reports that it was getting, found that there was a tremendous amount of inaccuracy and wanted to point out that there is very little in the current rules that would require a carrier to insure that their intermediate numbers are reported as assigned when appropriate, or to insure that the utilization of these numbers are being properly reported, or that the receiving carrier has a foreseeable or current use for the numbers. And I use the reference as FCC 00-104.

I don't know if this change order that you're referencing is going to address that kind of issue but this was a state that was concerned that numbers that are made available for use by another carrier or non-carrier entity should be characterized -- they're just not getting accurate information and there doesn't seem to be any kind of penalty or enforcement provided for that.

MR. MANNING: In response to that, the short answer is this change order does not address that. I do know that the issue of intermediate numbers was discussed at the INC but at this particular time there has been no direction or any INC resolution that would address the specifics of what you talked about there.

CHAIRMAN KANE: Okay, I'll take that back then to the state that raised it

and perhaps they could address it to the INC. Would that be the appropriate?

MR. MANNING: Certainly you can address it to the INC. You can address it to us and we can --

CHAIRMAN KANE: Yeah, I mean I don't know at this point whether it's a widespread problem or whether it's in this particular instance, that it was a major carrier that was involved in a major state.

CHAIRMAN KOUTSKY: Don Gray, Nebraska.

MR. GRAY: Don Gray, Nebraska, Public Service Commission. I'm not going to say that every state has the problem but I have spoken to more than just the state that Chairman Kane is referring to and even in little old Nebraska we have issues with intermediate reporting either not being followed through or not being accurate.

And I will take on the task and I will get with Adam and find a champion that I can team with to bring an issue to INC to have this looked at and see what have we got in place and if anything needs to be changed or do we just need some enforcement action or exactly what should occur.

CHAIRMAN KOUTSKY: Okay, I would appreciate that. That was actually one avenue I was going to suggest. I would also suggest that we talk about it in the INC report. Hold on, let me get Rosemary and then we can go.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I don't recall what this paper said that the NANC put together and I don't recall how many years ago. It was a long time ago but there is something somewhere that between Anna, Mary,

and I, I'm sure we could find it. It may take some time but there was a white paper on intermediate numbers that was outlining several different options.

I don't even recall, it's been so long, if we actually came to one conclusion about anything or not but it was forwarded to FCC quite some time ago so I will take an action to try to find it and if I can I'll send it to you and if I can't I'll send you a note telling you that it is just lost. Thank you.

CHAIRMAN KOUTSKY: Don.

MR. GRAY: Don Gray, Nebraska. Just a follow on that, I appreciate that Rosemary. I'm sure this has been brought up before and I don't want to use a broad brush to paint all carriers are having problems.

As often is the case it's some carriers here, some carriers there but I think this issue plus the fact that there's confusion by rural primary carriers as to what level they're supposed to report at is going to become even more important.

If some of the discussions about how USF should be looked at going to a numbering basis as opposed to a revenue basis, NRUF is going to be extremely important, and I've got a sneaking hunch NANC is going to be in there with both feet on this issue before it's done even though its not in our house.

CHAIRMAN KOUTSKY: We're going to need to make sure that that is as accurate and up to date as possible. I mean it does seem that getting back to change order 18 that this is going to be something part of that in terms of helping it getting down to the block level.

One thing I'm thinking about, and I know you had mentioned taking it to

INC, but I was wondering if we should make this an NOWG work item to a certain extent to at least find that -- I mean I don't want to volunteer your resources but to at least find the prior report that might have been done on this which I think I recall as well. I think it might have been in 2003 or 2002.

Anyway, we're talking seven years now probably, likely, but to reassess that and really no disrespect to INC, but to kind of pick this up as an NOWG action item to work with INC on. That way we would have the ability of (unintelligible) states to participate at that level. I'm just thinking it might be a little bit easier to take that and then the communications would be through NOWG over to INC.

MS. EMMER: Rosemary Emmer, Sprint Nextel, and that way it's public and open, easy to figure out the bridge numbers what not, and I'm happy to work with the NOWG on that.

CHAIRMAN KOUTSKY: Yeah, exactly. Okay, I appreciate that. And again I don't mean to imply anything about INC but I think it might be best to kind of keep this issue here with us to work at the working group level and then take that to INC essentially as a status item.

So if you think there's any communication that I need to make to NOWG, I think I might do something, a memo.

MS. MCNAMER: Natalie McNamer, T-Mobile. I'm a tri-chair of the NOWG. We will take that as an action item. If you guys want to write a letter that's fine. I mean I think we can just take it from the transcript.

CHAIRMAN KOUTSKY: Yeah, it might be taken -- the appropriate thing

from the transcript or something like that. Just in part because I want to somewhat crystallize the relationship between what INC has already done on this, and I'll ask Adam when he's up here in ten minutes.

Any other thoughts on that because I want to make sure that if the state has a question or a concern that we make sure it gets addressed fully and rapidly?

MR. MANNING: I only have one minor item. A couple of items here. Just real briefly, our second quarter '09 newsletter is out and available on the website.

The final item is on July 8th, the former contract that we were operating under for NANPA expired so on July 8, '09 the FCC issued NeuStar which returned a sole source bridge contract for a period of six months to continue to operate as the NANPA, and that's July 9, '09 through January 8, 2010, and in that contract there are two option periods of six months each so currently we're now operating under that new contract at least for a base of six months.

And the final item is the remainder of my report gives you details about the relief planning activities for area codes expected to exhaust in the next 36 months. And that concludes my report.

CHAIRMAN KOUTSKY: Okay, thank you, John. Are there any further questions for John? Okay, thanks.

REPORT OF THE NATIONAL THOUSANDS-BLOCK POOLING

ADMINISTRATOR (PA)

Now we'll move on to the Pooling Administrator. Amy. Which again I will note is another document I failed to send on the e-mail. I was a little disjointed on these e-mail (unintelligible) the last couple of days. I sent the wrong things and multiple copies of other things so I apologize for that.

But anyway this document that says Pooling Administrator which we'll mark as Exhibit 4. And again, these will be part of the official record and these are all posted on the NANC Chair website right now. Amy.

MS. PUTNAM: It's been a long time since I've been able to say pooling is fine.

Okay, we failed to make your report last summer with the NANC and of course our annual report which is also posted covers all of 2008 so this report dated July 16, 2009, covers from January 2009 through the end of June 2009.

I note that on page two I left out a number. The number of blocks reclaimed in June is 28 which I did put in on page four but didn't put in on page two.

The first page is the summary data for applications processed broken out and it is there for your reading pleasure. I'm not going to read it.

We had a total of 46,239 part three's that we processed during the first six months of 2009. That's down from 2008. Our total for 2008 was 108,835 so maybe we'll pick up in the second half of the year.

We opened a total of 1,055 central office codes in the first six months of

2009, 267 LRN's, 54 dedicated customers, and 734 for pool replenishment.

We provided forecasting data on the bottom of page three. Top of page four, summary of rate center file changes, January 2009 through June. These would be rate centers that changed from M* to mandatory single service provider, to multiple service provider, or from excluded to optional.

And we had no supplemental implementation meetings this year so these were either carrier driven changes or state driven changes. Carrier driven would be a second service provider goes into a rate center or a carrier requests that we change from excluded to optional because they want to pool in a rate center or a state requests such a change.

The reclamation chart here is a little bit different. We have included a column that is total number of new blocks with overdue part fours. This corresponds to a change that was made in our monthly NOWG report and the purpose for this extra column is just to delineate with more precision how many overdue part fours we carry continually month to month and how many are new each month.

On page six I'll be talking about expanding overdue part four projects. We were hoping to bring these numbers down, and the pooling administrator also sends the reminder and delinquent notices same as NANPA does on part fours that are either coming due or are overdue before a block ever hits the reclamation list.

Our system was up 100 percent of the time this year. We had no instances of unscheduled unavailability.

Under other pooling related activities we have some mundane things. The

requirements that we file with the FCC every month, quarter, semi-annually, and annually. We have the very old overdue part four reconciliation process.

Some of you may recall that last year we received authorization from the FCC to clear up part fours that had been overdue since December 31, 2006, and we requested and received authorization on June 18th to continue that for part fours that had been overdue since December 31, 2007, that way we can clean up the reclamation list.

We submitted our February NRUF. We conducted two PAS refresher training sessions on March 31st and April 2nd which we specifically targeted towards service providers who were new to the pooling processes and we advertised them as that as well because we found that in the past sometimes the people who were very familiar with the process would log on to the training session expecting advanced training and we were trying to train people who were new to the process.

We participated in a variety of conference calls on the regular (unintelligible) side for industry workshops and for pooling training for various state staff.

As requested, we have the delegated authority petition update in this report. There are two petitions for delegated authority pending, Indiana and Mississippi. They have not yet been put out for comment.

With respect to pANI, we continue to serve as the interim routing number authority. We have attended some (unintelligible). We participated in ESIF. We participate in the ECDR subcommittee of ESIF. With respect to the permanent pANI, we continue to work on the pANI change order and are awaiting response to

some questions from the FCC.

On page ten we have a list of pANI issues that we have submitted to INC and contributions that we submitted to INC over the year.

Questions?

MS. MCNAMER: Natalie McNamer, T-Mobile. Amy, I was just wondering, do you guys have an estimated date that that change order will be submitted to the FCC?

MS PUTNAM: No, we do not. The change order is substantially completely on our end but there are a couple of major policy changes that we really need input on.

CHAIRMAN KOUTSKY: Kevin.

MR. GREEN: Kevin Green, Verizon. I recently saw a petition for the delegated authority in Pennsylvania. Is that similar to what we're talking about here? I just saw a petition the other day to the FCC from the state of Pennsylvania.

MS. PUTNAM: For delegated authority for pooling?

MR. GREEN: Yes.

MS. PUTNAM: I was not aware of that but yes, that would be the delegated authority petition update.

With respect to the change orders, we have listed all of the change orders that we have submitted for this contract including the date approved by the FCC and the date implemented. We have two that will be implemented at the end of July.

Other pooling activities, we've listed the pooling contributions to the INC

with respect to pooling, with respect to pANI issues, pANI contributions.

With respect to the NOWG, we participated in the regular monthly status meetings, participated of course in the operational review of 2008 performance.

On May 12th, we were advised that we received a rating of More Than Met for our performance in 2008. We reviewed the survey comments made by service providers and regulators and contacted those that raised issues or concerns so that we could either explain how the issue that they raised had been resolved or how we would work out the issue in the future, and there were a couple of suggested changes that will be incorporated into a future change order.

And as a result of discussions at the operational review we are now providing a monthly Thousands Block Pooling ad hoc reports and system performance reports to the NANC for distribution as the NOWG requested.

We added language to the definition of excluded rate centers. We began reporting monthly on reclamation activity as well as I mentioned earlier splitting the total of overdue part fours into new and carryover categories, and we met with a NOWG task force on June 19th to discuss how we resolve issues when they come into the pooling administration services center either by telephone or by e-mail, and we provided process flow charts to the NOWG on how we deal with those issues.

We also listed the various NANPA meetings that we attended because they involve pooling areas.

And the last page is voluntary special projects. In addition to the very old part four reclamation process which I've already previously mentioned, on April 6th

we completed a major project, an overhaul of the pooling implementation meeting materials going back to when we started pooling.

There were 14,000 files, and we reviewed each file. We consolidated files, categorized them, reduced them to approximately 1,400 necessary historical files, renamed in a common convention, and transferred them to a NeuStar server, and we hope made them more user friendly. From feedback we have indication that we were successful in that.

And a project that we started in December of 2008, and we continue to work on, we identified companies that have numbering resources assigned to them in mandatory pooling rate centers but appear not to be participating in pooling in those rate centers and we received responses from 133 of the 225 OCNs that we contacted.

Thirty-eight companies returned or donated 20 full NXXs and 845 thousand blocks and we continued to research a list that had a total of 900 NXXs and 766,000 blocks that appear to be assigned to companies that are no longer operating and so far we've received 173 additional block donations from this list and we've tracked down and corrected the data on some of the other blocks where companies had not updated their data.

Any questions? Thank you.

CHAIRMAN KOUTSKY: Thank you, Amy. I thought it made sense to have NOWG go now, Natalie, if that makes sense with you guys. It says at the end of the agenda that I can change it if I want, if she agrees, so I just did or we just did.

REPORT OF THE NUMBERING OVERSIGHT WORKING GROUP

(NOWG)

This is the report of the Numbering Oversight Working Group and somewhere in here is a presentation. I don't have it but feel free to start.

MS. RIEPENKROGER: My name is Karen Riepenkroger with Sprint Nextel and I co-chair or tri-chair the NOWG Working Group along with Laura Dalton of Verizon Communications and Natalie McNamer of T-Mobile.

We're going to cover today the performance rating categories, the NANPA and PA 2007 and 2008 performance reports, NANPA change orders, PA change orders, and our 2009 meeting schedule.

The next slide is the performance rating categories and this slide reflects the rating categories and the criteria of each rating category that the NOWG utilizes for the performance ratings of the NANPA and the PA.

On the next slide, in 2008 the 2007 NANPA and PA performance reports were approved by the NANC via the e-mail process and the 2007 performance rating for the NANPA was More Than Met and the rating for 2007 for the PA was also a More Than Met.

For 2008 for the PA performance report, the PA annual performance assessment is based upon the 2008 performance feedback survey, written comments and reports, annual operational review, and NOWG observations and interactions with the PA throughout 2008.

For 2008, the NOWG determined that the PAs rating would be a More Than

Met and a More Than Met is (unintelligible) often when above performance requirements provided more than what was required to be successful, performance was more than competent and reliable, decisions and recommendations usually exceed requirements and expectations.

The next one is on the respondents, the next slide. The number of respondents to the 2008 PA survey was up from 2007 by eight for the regulators and down slightly from 2007 for service providers.

And then the chart at the bottom of the slide reflects the trend of respondents since the inception of the PA performance survey.

You can review the next three slides at your leisure, and they are the cumulative ratings by section from the PA survey.

Any questions?

On slide 11 is a summary of written comments that were provided by survey respondents. Outstanding praise for the PA staff was a consistent theme --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 1, SIDE A)

* * * * *

(START OF AUDIOTAPE 1, SIDE B)

MS. RIEPENKROGER: -- Supportive, responsive, prompt and courteous, extremely helpful, knowledgeable and professional. Always a pleasure to work with, provides exceptional service, possesses a clear understanding of the process, and takes extra steps to assist and provide immediate answers to questions.

On the next slide, comments suggested improvements were mostly isolated. Notable comments related to difficulties associated with PA website, data, and navigation, reclamation process and part four submissions, and PAS functionality when transitioning to the new enhanced PA system.

And the next slide, for NOWG observations, the NOWG concluded that the written comments were not indicative of any consistent performance issues and in many cases provides significant praise for individual PA staffers.

In summary on the suggestions, the NOWG recommends that the PA focus on the following improvements: continue to proactively manage rate center inventories to insure resources are available when needed, continue to consider process improvement suggestions provided by service providers and/or regulators in the survey comments, continue customer focus in addition to the cumulative method of reporting block reclamation.

The NOWG recommends the PA provide an incremental block reclamation report and the NOWG recommends the PA prepare a monthly NANC report providing the NANC members with the current status of pooling activity.

Are there any questions on the PA performance report?

Okay, the NANPA performance report, we used the same set of criteria to base our assessment on, the 2008 performance feedback survey, written comments and reports, annual operational review, and NOWG observations and interactions with the NANPA.

The NANPAs rating for the 2008 performance year was determined by

consensus of the NOWG to be Exceeded, and Exceeded is defined as exceeded performance requirement, provided excellence above performance requirements, exceeds expectations, performance was well above requirements, decisions and recommendations exceeded requirements and expectations.

The next slide, the number of respondents to the 2008 NANPA survey was up by seven from 2007 for regulators and then for the service providers and others it was down in 2008 from 2007. And the chart at the bottom of the slide again reflects the trend of respondents since the inception of the NOWG performance survey for the NANPA.

The next three slides reflect the cumulative ratings by section from the NANPA survey. I'll let you read them individually. I will not go over them.

The written comments that were provided by survey respondents provided significant praise for NANPA staff and this was a consistent theme throughout the survey. In many cases the comments provided praise for individual staff members and the following recurring adjectives were used by multiple respondents to describe their experiences in working with the NANPA staff; very helpful, pleasant and friendly, knowledgeable, courteous and patient, responsive, accurate and professional. There were not recurring comments for suggestive improvements.

Due to the vast majority of positive comments received the NOWG concluded that the written comments indicated a high level of satisfaction experienced by those who interacted with the NANPA.

NOWG observations; a consistent level of satisfaction revealed NANPA

focuses on customer satisfaction, significant praise for NANPA staff was a consistent theme throughout the survey results, cooperation with the NANC, NOWG, FCC, and state regulators. NANPA continued to display leadership, initiative, professionalism and expertise and proactively introduced new INC issues and contributions.

The NANPA continued to effectively manage all aspect of NPA relief activity in 2008 and throughout 2008 the NANPA personnel continued to consistently exhibit their professionalism and expertise while performing NANPA duties.

Are there any questions on the NANPA performance?

The next slide is approval of the 2008 performance reports for the PA and the NANPA. The NOWG asks the NANC for their approval of these reports.

CHAIRMAN KOUTSKY: Okay, before that we can mark the exhibits so I know what we're talking about. The Power Point presentation is Exhibit 5. The 2008 PA performance evaluation report will be exhibit 6, and then the NANPA performance evaluation report will be Exhibit 7. So I just wanted to mark those.

I guess we'll just take them one a time. First of all I'd like to thank the NOWG for all their work on doing this. This is generally thankless work to coordinate these surveys.

I'm actually pleased that we got a majority of the states to participate in the surveys this year and I think that's important to us to make sure that we're being responsive to those concerns and pulling this together is actually a lot more work

than it appears so I do appreciate all the work that they do.

Do we have any thoughts on the PA evaluation report for the Pooling Administrator? Sorry, José, I didn't see that.

MR. JIMENEZ: José Jimenez from Cox Communications. I was just curious, the trend of participation from industry is interesting to me in that it continues to go down. Is that an issue that worries the NOWG long term? To what do you ascribe the continued decline in the participation from industry?

MS. RIEPENKROGER: For both the PA and NANPA?

MR. JIMENEZ: For both, they both show it.

MS. RIEPENKROGER : Right they do. We really don't know what causes it. Some of it could be consolidation of companies where there was maybe two yesterday and it's one today.

A lot of times I'll send out an e-mail to a company that hasn't had a response and they'll say well, I didn't order anything from them this year so I'm not going to respond to it. So those type of things. Maybe they didn't have as much interaction and they chose not to respond and I always tell them, but do you do anything with area code relief and do you do NRUF?

And so sometimes they will come back and respond with something but a majority of the time if they're not ordering numbers they don't send in a survey.

So we do our due diligence. We'll take a look at who sent them in the years past and we'll go out and we'll send an e-mail to them or see what we can do to get people to submit surveys.

I want to thank the NANPA and the PA. They definitely help us. They send out periodically, reminders to everyone to submit their surveys and the surveys come to me and typically after the e-mail goes out, notification, I'll get a whole bunch of new surveys in.

So I think everybody is really busy in their day to day life and this is not something that they -- when they see it and they come in, if they don't do it right then it gets put aside and they forget about it. So it's just -- they need constant reminders in order to submit their surveys and the frequent reminders from the NANPA and the PA have just been a real life saver for us in that respect.

MR. JIMENEZ: Thank you.

CHAIRMAN KOUTSKY: Other thoughts on the PA report? Did you have something Rosemary or not? Okay.

If we have no further thoughts on the pooling administrator's report I think we will consider that approved and thank the NOWG for their work on that.

And do we have any specific thoughts on the NANPA performance evaluation report? Seeing no further thoughts I think we will consider that approved as well, and I will transmit the NANC approval on these tomorrow. And once again, I appreciate the work.

MS. RIEPENKROGER: Thank you very much. Thank you everyone for approving them for us today.

There are just a few other slides here and I'm not really going to go through them. It's the NANPA change orders and the PA change orders and actually John

and Amy reviewed those during their presentation.

And then the last slide is our meeting schedule through September for 2009.

Are there any other questions for the NOWG?

CHAIRMAN KOUTSKY: And I guess I would just note the action item we just added to NOWG to get it in this section of the meeting.

This is the action item to do some preliminary research and discussion with the state commissions about intermediate number in terms of discovering past reports and what the NANC has done, and also to taking those concerns that the industry and (unintelligible) you might have and use that as forum to communicate with the INC and then report back to NANC at a future date.

MS. RIEPENKROGER: And we do have that noted as an action item.

CHAIRMAN KOUTSKY: Thank you, Karen. Anything else?

All right, I'm just going to blow through the break time. I don't know why I scheduled one. I think I've always waived the midmorning break.

**REPORT OF THE NORTH AMERICAN PORTABILITY MANAGEMENT
LLC (NAPM LLC)**

Mel Clay for the NAPM LLC. I believe he has a document that looks like this. It's called North American Portability Management LLC report to NANC which we'll mark as Exhibit 8.

MR. CLAY: Good morning, NANC. Mel Clay, I'm co-chair of the NAPM LLC. The other co-chair is Tim Decker from Verizon.

This report was designed to inform you of activities that the NAPM has

worked on over the past year at a high level.

The first activity, each year we hold annual elections. The NAPM held elections on November 19, 2008, for the office of positions of co-chair, one position out of two, secretary, assistant secretary which is a new position that we put in this year, and treasurer.

Elected were Tim Decker, co-chair for a two year term to serve with me for the remaining of my term which will expire in November, Paula Jordan, secretary for one year, Laura Dalton assistant secretary for one year, and Tim Decker for treasurer for one year.

The current NAPM LLC member companies are AT&T, Comcast, Embarq, Qwest, Sprint Nextel, T-Mobile, Verizon, and XO Communications.

At the last meeting we talked about new member recruitment activities and over the past year we have contacted seven service providers and provided them with information about possible membership at the NAPM LLC and we followed up with those service providers regularly.

XO Communications has become a new member since we last met here and that is also a result of our recruitment efforts.

The amendment of the operating agreement to allow VoIP providers, the NAPM LLC operating agreement was amended so that interconnected Voice Over Internet protocol providers could qualify to be members of the NAPM LLC as a result of the FCC order that extended to them the local number portability obligations including the obligation to contribute to shared numbering administration

costs.

The NAPM LLC has contacted VoIP providers, and we will continue to try to get a VoIP provider as a member of our body.

Okay, approval of SOW 62, the NAPM LLC approved SOW 62 by the required super majority vote, and by the way the vote was not unanimous. That was done in September 2008. This amendment settled a long standing dispute over whether and how the NPAC administrator could also qualify as the user -- and become a user of NPAC data.

It established a third party neutral process for the evaluation of all user applications and all services offered by the NPAC administrator.

A third party evaluator was selected and a process was established called the new user evaluator, we call it the NUE, to evaluate the qualifications of providers of telecommunications related services for access to NPAC data including a special more rigorous process for the NPAC administrator.

Approval of SOW 66 which is a validation of code ownership for codes opened in the NPAC, the LLC approved SOW 66 by the required majority vote. The vote was unanimous. This was done in November of 2008.

The amendment provides a process to validate code ownerships of codes opened in the NPAC and alert service providers that are responsible for apparent code mismatches.

Approval of SOW 69, which was NANC change order 436. Due to an emergency situation that happened in the fall of last year that threatened the

industry's LSMS capacity exhaust, the LLC approved SOW 69 by the required super majority vote. The vote was unanimous. It was done in September of 2008.

This amendment allowed the addition of three perimeters to the optional data field. The three perimeters are Alt-End User, Location Value, Alt-End User Location type, and Alt-Billing ID.

This was done to allow service providers to contain the information in the field End User Location Value, End-User Location Type and Billing ID and pooled block records. This will conserve the growth of the NPAC and help eliminate the LSMS capacity issues that were experienced last fall.

Approval of amendment 70 which is a pricing amendment, the NAPM LLC approved amendment 70 by the required super majority vote. The vote was not unanimous and the amendment became effective January 1, 2009.

This amendment changed the pricing model from a transaction basis to an adjusted flat rate basis. The change results in substantial savings to the industry on LNP charges with no extension to the contract term.

Approval of SOW 72, which is NANC change order 429, 430, and 435. The LLC approved SOW 72 by a majority vote that was not unanimous in May of 2009.

The NPAC will incorporate and provide functionality for URI perimeters for voice, multi-media message services, MMS, and short message service, SMS. The database will provide the ability to provision the URI perimeters for each SV and pooled block record on an individual service provider optional basis.

Those are the things that we've worked on. Are there any questions? Yes.

MR. CANDELARIA: Jerome Candelaria, NCTA. Concerning the amendment to the operating agreement to allow VoIP providers to be members, is that full membership with equal voting rights or is there a tiered membership system?

MR. CLAY: Jerome, it's full membership with equal voting rights.

MR. CANDELARIA: Thank you.

MR. JIMENEZ: Jose Jimenez from Cox. I don't know if it's appropriate to ask but I'll ask anyway because I'm a rookie.

Statement of work 62, in your bullet and in the presentation you explained that the NAPM had resolved whether and how the NPAC administrator could qualify and become a user. I would like to understand more about what was the controversy, why is it that this was a split vote.

MR. CLAY: Okay. The NPAC administrator has services that they need access to NPAC data for. However they are the administrator of that same data so there has been a long standing dispute between the administrator and the NAPM LLC that the administrator should come to the NAPM LLC and request to get access to that data because they're the administrator of that data.

So to solve this problem we put together a third party evaluator to evaluate whether or not they should have access to that, that will eliminate them having to come to us for each time they needed to apply for use and it not only applies to the administrator, it applies to any other company that's not a regular service provider but that is a provider of telecommunications related services.

This evaluator will look at their application and also make a determination whether or not they're qualified to use that data.

MR. JIMENEZ: Why was that not sufficient for the minority?

MR. CLAY: I'm not sure I understand that question.

MR. JIMENEZ: I mean in other words it sounds like a reasonable solution but it was not a unanimous decision. Was there another concern the minority had that caused them to --

MR. CLAY: Actually I don't remember the company that chose to vote against this, I can't remember their concern at this point but if it's important I can go back in the minutes and look that up and provide that.

MR. JIMENEZ: All right, just curious. Thank you.

CHAIRMAN KOUTSKY: Rosemary, and then I have a couple.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I just wanted to qualify that I wouldn't call it a split vote. I would just simply call it that it was not unanimous vote, that was all. Thank you.

MR. JIMENEZ: I have one more question.

CHAIRMAN KOUTSKY: Sure, feel free.

MR. JIMENEZ: On amendment 70, pricing, here again I don't know if it was a split vote or maybe not a unanimous vote but it notes here that the change in pricing results in a significant savings to the industry.

MR. CLAY: Yes.

MR. JIMENEZ: So again my question would be given that statement,

what was stopping the entire -- whether it was a split vote or whatever you want to call it, what was stopping the entire NAPM from adopting this?

MR. CLAY: Okay, there was one company I believe that did not agree with the savings in terms of the contract. Again, I would have to have the minutes to be accurate and I don't have those minutes. If that's important I will insure that those minutes are addressed and that it is sent to the Chairman here for --

CHAIRMAN KOUTSKY: And then we can figure out a way to put them in the record. I actually received some communications from the LLC that I sent to the full NANC after the amendment was adopted that contained some detail.

I think it would make sense to put those in the record as well because I think there's a little more detail on that and I also think there were similar -- different things were filed with the FCC as well about that so I think it probably makes sense to have it consolidated and keep all that stuff in the record about those amendments.

I'll endeavor to collect those and if people want to inform me of things that they think should be in the record about this I'm more than happy to put them in.

MR. CLAY: So I will send the information from the amendment SOW 72 and amendment 70 to Chairman Koutsky.

MR. JIMENEZ: Thank you.

CHAIRMAN KOUTSKY: Rosemary.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I just wanted to make another clarification that you had mentioned about adopting the SOW, whether or not this was adopted as a result of the vote not being unanimous, and I just wanted to

make sure that you were clear that the entire LLC did adopt the SOW via super majority vote.

So the super majority vote actually passed, it just simply wasn't unanimous. So I just wasn't understanding what you were saying. In any event I wanted to make sure I clarified with you that this did in fact pass via super majority vote. It just was not unanimous. Thank you.

MR. JIMENEZ: This is Jose Jimenez from Cox. I appreciate the clarification. I'm always curious since I'm learning this, how is it that it works so thank you.

CHAIRMAN KOUTSKY: Actually if you don't mind, I have a couple questions I've been sitting on for a second and then I'll go to Kevin because they're back actually about the first amendment Jose related to, the third party administrator or the third party evaluator.

I guess my question is and this is maybe something that we need to have supplemental information, is that the identity of the third party evaluator, who is that, how was it selected.

And also since it's had a few months, I'm curious about the difference because it essentially says that there's a more rigorous process for the administrator so I would like to know what kind of information we might be able to at least receive as NANC that talks about how that person or that evaluator was selected, what standards they're using, and also since we have the benefit of a few months of operations, you know, whether we can get some kind of information and feedback as

to how that's going, if there's been questions, concerns.

My understanding is that a lot of these people that utilize the data tend to be public safety operations to a certain extent, you know, some police departments, et cetera, other users of the data and I want to make sure that we haven't changed the process on them in a way for the worse.

MR. CLAY: I can guarantee you that we have not changed the process for that. The people that go through this new process are service providers or providers of telecommunications related services.

And the way the third party evaluator was chosen, there were two companies that were recommended. One by NeuStar the administrator and one by the NAPM LLC and we evaluated those two companies and we chose the company that the NAPM LLC had recommended.

The way it's going right now, it's been in operation since May. We've had several telecommunications, well, providers of telecommunications related services, companies to apply for access.

The third party evaluator does an evaluation. They send that evaluation to us. We have a committee set up as the CIC committee which is the Contract Implementation Committee, and the CIC committee reviews the recommendation from the evaluator. If we agree with the evaluator then that company that has applied will get access to the data. If we do not agree with the evaluator then we do our own evaluation and so far we have not had to do that.

CHAIRMAN KOUTSKY: And who is the third party evaluator?

MR. CLAY: It's a company called TM&G.

CHAIRMAN KOUTSKY: Sorry?

MR. CLAY: TM&G.

CHAIRMAN KOUTSKY: TM&G, okay. And I guess I'll just kind of make this a request. Perhaps if the LLC could just provide that information in terms of what the standards are for evaluating.

MR. CLAY: We'd be happy to. We can provide you with the SOW.

CHAIRMAN KOUTSKY: Yeah, that would be great. And just add that in and also some kind of indication as to -- again, I'm concerned that if we're adding another step in there that we might be introducing some uncertainty and delay in the process but you said since May, and there's not been a situation where's there's been an incident overturning.

MR. CLAY: None at all. It's been working great. Now you did mention that you thought that public service and law enforcement may be involved. It's not and there is a process that is called LEAP and please, I don't know what the acronym stands for off the top of my head, but there is a process that allows law enforcement to get certain small amounts of data, not full access to all NPAC data but small amounts of data and that is a whole different process.

CHAIRMAN KOUTSKY: Okay, so this doesn't affect that process.

MR. CLAY: No, it does not.

CHAIRMAN KOUTSKY: That's good to know. And I guess that might be something you could do a follow-up letter on just to kind of clarify that so we

can have that in the record, more than just an oral statement. It would be very useful.

MR. CLAY: Sure.

MR. KOUTSKY: Do we have other questions? I did want to dovetail into -- as you all are aware there has been a dispute filed with the NANC about certain of these amendments and we've created a dispute team.

I did want to kind of seize from this to that, so I don't want to seem as not asking about that, but Chairman Kane is going to give a very short presentation as to status report on that but I do want to keep Mel up here and we can continue to ask questions about that but I'm refraining from asking questions about that at this point in time. Do you have anything more Jose?

MR. JIMENEZ: This is what happens when one is learning, they ask a lot of questions.

In your statement Mr. Clay, since September '08, has the NPAC itself, the NPAC administrator gone through the third party to have some of its user applications approved?

MR. CLAY: They were the first.

MR. JIMENEZ: They were the first.

MR. CLAY: Yes.

MR. JIMENEZ: And they were successful?

MR. CLAY: Yes, they were.

MR. JIMENEZ: Thank you.

CHAIRMAN KOUTSKY: Is there anything further on this report?

Okay, then Chairman Kane, you're welcome to make the presentation from there or you can come up here. I think just by way of introduction and I guess I probably since we're discussing it should probably formally -- since we're going to have a supplemental record for this anyway, it's based on what we just talked about in terms of the other information, I think I'll make the Telcordia dispute request part of that just so we have a document.

But pursuant to my e-mails and a couple of memos to the Council, under the FCC rules Telcordia has a right. They have filed a dispute with regard to certain of the amendments. The NANC dispute is with regard to amendment 72 which was the last item that Mel reported on.

Under the FCC rules they a right to a dispute resolution process as I described to you. So to make sure that that dispute gets a full and fair hearing, I sat forward a process in terms of creating an independent review team.

Fundamental fairness dictated that the members of the team be people that were not involved in the decision on the amendment and I'm eternally grateful for Chairman Kane and Don Gray to volunteer their expertise on this because they actually both bring significant expertise to various different levels on this. Don is one of the few people that actually worked on some of the original issues that related to this over time.

So I'm going to turn it over to them. There's a subsequent memo on process in terms of how they wish to proceed and I'm going to just let everyone know that I've thought about this a fair amount and I'm really looking to that team to drive the

process and to do it in a fair, full and open way. So very quickly, Kevin.

MR. GREEN: Kevin Green, Verizon. I did have a question about the process as a new member and I was looking around to see if there was any detailed information in regards to the process, the makeup of the team or anything like that and I looked in the operating manual. I really didn't see anything that kind of went into detail. Does something like that exist?

CHAIRMAN KOUTSKY: On this, no. I won't obfuscate that. No, this is relatively new territory. We've had disputes filed with us before and sometimes it can be taken care of through an open meeting, discussion. This one I actually felt probably it was best to do a little bit of factual and legal development.

And just so you know, the purpose of what the team is doing is to provide complete information to the full NANC so that the full NANC can take an action. It's not meant to cut this off in any way. It's actually to gather more information so the NANC can have everything in front of them. I'd really like Chairman Kane to talk it through rather than have me talk it through.

MS. EMMER: Rosemary Emmer, Sprint Nextel. My question is about the process similar to Mr. Green's question and maybe you just answered it but several of us have been looking and trying to find where the process was that basically meant there would be three people on the panel versus maybe four, five or six and we did actually find a document called Resolution of Local Number Portability Disputes from 8/1 of '97.

We can't figure out where the document is included in which actually does

say that perhaps the NANC Chairman would direct three people. It's just the way that we're talking directing in this particular document is not -- that the NANC Chairman would decide who those people were, it was that the disputed parties would have one -- each disputed party would have a say or whatever.

So I guess my point is, I wasn't sure if perhaps you were making the decisions based on something you found, and if it was this document I wanted to know where it came from.

CHAIRMAN KOUTSKY: No.

MS. EMMER: But if you were just absolutely making that decision all on your own to appoint two other people other than yourself then that was sort of my question and then I kind of wanted to know what the process would be as far as all the NANC members being able to see as you go through, in the absence of having NANC meetings, we would know what's going on.

CHAIRMAN KOUTSKY: I'll defer the second part to the first one. The first one is no, I was not referring to that document that I think you're referring to.

MS. EMMER: Okay, very good.

CHAIRMAN KOUTSKY: As far as (unintelligible). For myself I just viewed this as it was important to do some development of the record for lack of a better term but the final -- and again in the end just so people are aware of the process here, this is for the preparation of a recommendation by the full NANC to the FCC as to the resolution to the dispute so there are several iterative steps of which this is only the first.

MS. EMMER: Okay, so as far as timeline and that kind of thing will we still have time for questions afterwards?

CHAIRMAN KOUTSKY: Yes. And José, very quickly.

MR. JIMENEZ: José Jimenez from Cox again. One thing I heard you say Chairman Koutsky is that you tried to select members for this committee I guess that were not participants in the NAPM decision making. I'm not sure, I think I heard you say something like that.

CHAIRMAN KOUTSKY: Yes.

MR. JIMENEZ: So did you look at the current makeup of NAPM and decide okay, I'm going to look at other members of NANC who are not members of NAPM and I'm going to go to them? Could you help me a little bit on that?

CHAIRMAN KOUTSKY: Given that I'm aware that there is disagreement among those in the industry as to this issue, there were two criteria that I used and I did not think that since it was a complaint that was lodged about an action by the NAPM LLC that -- I did not think it would be appropriate to appoint somebody who was affiliated with a company that's on the LLC.

First of all there are potential conflicts with regard to confidentiality of information and then you run into agency issues inside companies where one person does something, but also I think fundamentally you're talking about an appeal of a decision that's someone made. It makes sense not to have the person involved in that decision as part of the appeal body.

And then my second criteria was to find neutral people who would not have

benefits one way or the other as a result that comes out. So that's why my eyes turned towards the public representatives of NANC again to perform this initial compilation and review. That was basically it.

In the end it's a NANC decision. It is not a decision by a couple of people from NANC. In the end it's a NANC decision so, you know, not to take away from whatever they're going to recommend, it is not necessarily -- you know, they will not be speaking on NANC on this. NANC speaks for NANC. It's just this initial process. Karen, please speak into the microphone.

MS. REIDY: I know that the process includes accepting comments from NANC before the report gets submitted for consideration in September or October, but what's the process for -- if the full NANC doesn't agree with the report recommendation at that time, does that still get sent to the Commission or is it changed or how does that process work? I was just curious.

CHAIRMAN KOUTSKY: Yeah, processing things, I might kind of push that to Chairman Kane. On the thing as to whether -- again it is a NANC recommendation that goes to the FCC. I think on your later question, I think we will cross that bridge if we approach it and so I think I'll just have Chairman Kane go over her memos and then we can continue to talk about this. I don't want to cut off discussion.

**TELCORDIA DISPUTE RESOLUTION TEAM: SCHEDULE FOR
CONSIDERATION**

CHAIRMAN KANE: With the introduction, Betty Ann Kane, District of Columbia, and I guess I still have to say I'm pleased to accept the assignment to work on this.

As you know just for record, Telcordia Technologies did file a protest or a dispute on May 26, 2009, and we know the rules provide that the full NANC makes a recommendation on those disputes to the FCC which will be the final decision maker.

And as the Chairman has said, he created a dispute review team which does consist of myself, of Don Gray of the Nebraska Public Service Commission staff, and the Chairman, and we were charged with five specific tasks.

There was a July 7, 2009 memo from Chairman Koutsky which was sent out by e-mail and those five tasks were one, to review the complaint, two, to interview the participants, three, to summarize, and four to draft an initial report and recommendation for NANC's consideration. I'd say that is an initial report.

And so we have talked and are going to proceed on the following schedule. Today we're providing you with a status report at the full meeting and today on the record interviews will begin and will continue through August.

It is our goal to have written comments and responses on both the legal and the factual questions that have been raised by Telcordia, written comments and responses to us by July 31st, and then as I said we will continue with interviews.

And our target date is September 1st to circulate a draft report to the full NANC, and then in September there will be opportunity for the public and NANC members to provide responses to the draft report and at the next NANC meeting which I believe the Chairman is trying to schedule for the end of September, maybe the third week in September, the first week in October, the full NANC will consider the report and any recommendations, if we have recommendations at an open meeting.

The NANC Chair will then finalize and submit the report and proposed resolutions based on the discussion and the decision of the full NANC at that September/October meeting and it will be sent to the Wireline Competition Bureau at the FCC for public notice and then as I said the final decision is for the FCC to make.

The interviews -- let me say that we're going to conduct will be focused entirely on the facts. They will be on the record. We intend to take notes at the factual interviews. We will provide a draft of the notes to the interviewees with their review and corrections and then we will promptly post the final notes of all interviews on the NANC Chair webpage so that they will be available as we go through this process to everyone on the NANC.

And similarly all written comments and communications will also be posted and made publicly available, and you have in the memo the address, the web address for the NANC Chair webpage.

And then we also are providing you with my contact information and Don's

contact information if you do have any questions as well as of course Tom's contact information throughout this process so that we can be sure it's a very transparent and very open and very fair process. I'd be happy to answer any questions.

CHAIRMAN KOUTSKY: Thank you, Chairman Kane. Rosemary was first.

MS. EMMER: Rosemary Emmer, Sprint Nextel. Thank you for giving us the status report, specifically your July 31st deadline for written comments and responses.

I would like to ask the review team to push that date out to at least the 15th if not longer because of the fact that that is only like a two week turnaround and there's many of us on vacation for the next couple of weeks and so frankly it would be really nice if we could have at least two more weeks on that deadline or that turnaround, especially if these written comments are going to be made public et cetera, et cetera, they are going to have to be going through a pretty lengthy process of getting some approval internally you know, so that would be the first thing.

And the second thing is, as far as who you're planning on interviewing, are you planning on doing that just like one on one or are you planning on going to like groups of people, you know, or segments of the industry?

CHAIRMAN KANE: We will be interviewing first of all the co-chairs of the LLC and then we will --

CHAIRMAN KOUTSKY: Excuse me, of the LNPA.

CHAIRMAN KANE: Of the LNPA group, yes, I'm sorry. We will be

interviewing the co-chairs there first. Obviously we will interviewing the Telcordia and we will then -- and we have had a request that we interview every industry representative on the NAPM LLC and also that the record that we creates should include the minutes of the LLC which I understand may not be a public document but we still have to figure how to deal with that. I think that's a fair request and I think that's something we could certainly accommodate.

In terms of the July 31st versus later, our real focus was to try to get at least from the complainant if you will, the protestor and from the co-chair, something in writing by then but we will put that out. And then we decided not to have a formal kind of reply, comment area but to continue to take comments so it's like an initial deadline but it's not, but we want to continue to (unintelligible) so we will continue to accept it.

MS. EMMER: Rosemary Emmer with Sprint Nextel. So is the July 31st timeframe -- initially you weren't thinking about carrier responses?

CHAIRMAN KANE: Right. Yes, we were thinking --

MS. EMMER: Okay, I didn't get that from the beginning.

CHAIRMAN KANE: There will then really be an open period after that for any carriers, any additional comments, anyone having seen those initial documents up and until the time we're really ready to write the draft report and then certainly after that also.

MS. EMMER: Okay, so you're willing to look at Sprint Nextel's when we get it to you after --

CHAIRMAN KANE: I'm going on vacation too.

MS. EMMER: Thank you, appreciate it.

CHAIRMAN KANE: We will do most of the interviews by conference call also.

CHAIRMAN KOUTSKY: I would observe sooner is better just from the standpoint this is a fairly aggressive schedule so I wouldn't hold back.

CHAIRMAN KANE: And they can always be supplemented also.

CHAIRMAN KOUTSKY: People can always supplement but again sooner is better. Cindy was first, and then Hank, and then Mary.

MS. SHEEHAN: Cindy Sheehan, Comcast. Just on a clarification, you mentioned that you'd be looking at the minutes of the NAPM, is that correct?

CHAIRMAN KANE: We had a request that the record that we create include the meeting minutes from the NAPM.

MS. SHEEHAN: So also if you'll be interviewing the NAPM members since that much -- like the minutes is not necessarily a public record, will the NAPM members be able to be open about their input and that's still going to be made public to the NANC committee?

CHAIRMAN KANE: Yes.

CHAIRMAN KOUTSKY: Hank.

MR. HULTQUIST: Hank Hultquist, AT&T. I have a couple of questions, I think probably one of which Tom it's really a question for the Chairman of the NANC and another couple which may be a question for Chairman Kane.

My first question is when I look at the dispute resolution procedures, sort of the first touch point is that the parties are expected to try to resolve their disputes between themselves and I'm wondering if part of the work that Chairman Kane's group is going to do is to evaluate the steps that the parties have taken to try to resolve it among themselves before trying to resolve under the auspices of the NANC. So is that part of what you're going to be trying to evaluate?

CHAIRMAN KANE: We will be looking at the entire factual record of the process that was used and the process that has occurred leading up to the decision and the protest, yes.

MR. HULTQUIST: Okay, and then the second --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 1, SIDE B)

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(START OF AUDIOTAPE 2, SIDE A)

MR. HULTQUIST: -- Which is again looking at the process, what I see the process being is that the NANC should have a proposed resolution and that the parties should then determine whether or not they object to that proposed resolution before we proceed to a written report that we would then submit because what I see is the written report is submitted only if one of the parties objects to the proposed resolution. Is that consistent with the process you envision us undertaking?

CHAIRMAN KOUTSKY: Yeah, that is consistent with how I have perhaps unwitting (unintelligible) the two when I was thinking about the initial

report and recommendations as encapsulating the NANC recommendation. You're correct, there is this (unintelligible) process as whether people still have a dispute after that or not.

MR. HULTQUIST: Do you anticipate that the parties will submit a written objection to the proposed resolution or do you anticipate that that objection will be done here at the NANC or in some other context?

CHAIRMAN KOUTSKY: I don't want to speak for what parties may or may not want to object to or whether or not or how they want to object.

MR. HULTQUIST: I guess what I'm asking is should we signal them the kind -- the way we expect them to object if they do?

CHAIRMAN KOUTSKY: I would expect them to make their objection known when NANC has made a recommendation.

MR. HULTQUIST: And then the third question I have is given the nature - - what we know at this time of the dispute in order to evaluate a proposed resolution should it come to that by the NANC, I mean I understand there are going to be interviews of people who have been involved in the decision itself, but do you anticipate that the members of the NANC will need sort of a technical analysis of how the implementation of the statement of work could affect architectures for interconnection and other things and is that currently within the scope of the investigation?

CHAIRMAN KOUTSKY: Speaking for myself since I started the investigation, it is not within the scope of the investigation to go into those network

architecture questions.

If it turns out that they are raised by the complaint I would hope that the members of the team would note that and highlight that and it might be that we may have to have further NANC participation on those architecture --

MR. HULTQUIST: Yeah, I guess my question really comes from, you know, when I think a lot of the members of the NANC see this (unintelligible), I think what might be helpful is to understand how those fields would be used in terms of interconnection architectures and routing of transmissions in order to understand, you know, what is the value of this and how we should understand the terms of the dispute because I don't think we should expect that people immediately will in fact understand those issues.

CHAIRMAN KOUTSKY: To the extent that that is factual development that is necessary to address the dispute, I think that would be part of the charge of the review team.

I would just kind of reiterate that the point of the review team really, and the point of the interviews is to somewhat separate the factual statements that are made in the dispute, confirm them, extend them to the extent that people think that other facts are needed to be assessed.

Certainly in comments if people are willing to talk about the value or benefits of a particular set of information, I don't want this review team to be seen as second guessing statements that have been made by others in terms of the utility. I think I see it very focused on the complaint that has actually been lodge.

MR. HULTQUIST: No, I think that's the right approach. My concern though isn't necessarily that -- the review team I'm sure will do an excellent job but my concern is that to the extent this does come before the NANC in terms of reaching a proposed resolution, there may be some sets of facts that the NANC members will require in order to understand and assess the dispute that go beyond that nature of the facts that the review team is gathering.

CHAIRMAN KOUTSKY: Okay, and I do recognize that and I agree that -- it's one of the reasons why I asked Don Gray to be on the team is because his work at the Future of Numbering Group certainly involves that type of factual background.

He just put his little card up. I'll go to you and then I'll go to John. Don.

MR. GRAY: Don Gray, Nebraska Public Service Commission. I appreciate the confidence that you've placed in me on representing on this but as I've shared with others this morning and over the last few days, the discussions that Chairman Kane and I and Chairman Koutsky have had is first of all, let's identify what the facts are of the dispute, and it appears from what we see at this point that there's a question about the statute, what is or isn't allowed in the particular database, and then there's a question about the process of how one puts things in or doesn't put them into the database.

And if we get through all of those gates and we're still scratching our head and it comes down to a technical evaluation, I will be the first one to go timeout, we need to get additional technical expertise involved to provide information.

That said though, I would urge each member that has a concern or whose

company has a concern, there is I believe a sufficient record out there of what the URL can be used for, how they might be used. Go do the study. Don't expect Chairman Kane and I to present you with a playbook of what's good, what's bad, how it should or shouldn't be used.

You need to go understand what the industry is or isn't doing, and not just the United States, take a look across Europe and other organizations that are trying to make use of these because this is far reaching and this isn't new information.

This is what we identified in the Future of Numbering Working Group study in 2005. It's just that we're closer down the line of making use of these now and it was a hypothetical back then.

So our process is we're going to stop short of the technical gate in issuing you a recommendation there without getting more input.

CHAIRMAN KOUTSKY: Well said. Mary was next.

MARY RETKA: Mary Retka, Qwest. Just a clarification question because Chairman Kane I think you said that you were going to start with interviews of the co-chairs of the, I think you said LNP working group, and I think you meant the LLC. Just because we're on the record, I wanted to make sure we were clear from a perspective of your process.

CHAIRMAN KANE: Yes, you're correct.

CHAIRMAN KOUTSKY: Jeff.

MR. LANNING: Just to follow-up on Hank's question, maybe this was clear and if it was forgive me. What exactly would NANC be asked to do in a

recommendation? Rule narrowly on the dispute and basically be constrained by the parties or come up with in a more of equitable sense what we would recommend as a resolution? In other words, is it party driven or ultimately NANC driven what we do here?

CHAIRMAN KOUTSKY: I'll take a stab at answering that. With regard to the specific dispute resolution and process, the way I read the rule our recommendation should be confined to the bounds of the dispute.

And just so everyone is aware, what happens in the rule that's referenced in my memo is that we make a recommended resolution. That goes to the FCC. The FCC puts it out on public comment and then the FCC has a period of time which to review public comment and then take action and if no action is taken within 90 days of the public comment period beginning, then that recommendation is accepted.

Given that formal process, that recommendation in my opinion needs to be limited to the four corners of the dispute that was filed. The dispute letter actually lists six or seven specific questions and so we will answer those six or seven specific questions with our recommended answering.

At the same time if it turns out that there are more technical issues, things that are of broader import that might be useful for NANC to continue to study as perhaps either second questions, as follow ups, I don't want to dissuade NANC from considering those because we've got somebody that's filed a dispute on particular sub questions of that issue, but I would not treat those perhaps broader questions about, you know, the utility of URI information in a database which is in this

complaint but it also has different technical aspects. That would not necessarily have to be part of the initial recommendation, the recommended resolution to the FCC.

So I view the formal process as being within the four corners of what was filed with us as a dispute. Does that answer the question? Okay, Rosemary.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I'm still a little bit confused. My read of the dispute is trying to answer two things. Number one was the decision lawful, and number two was the correct due process followed.

So to me it's kind of in layman's terms, it's the two things we're looking at here and so if the decision -- I mean so you kind of have to answer one before you answer the other. I mean we could go and decide whether or not the process was followed. We can do that. So is that what we're doing?

So when we're going to issue written comments and we're going to be talking to the review team, are we going to be focusing on the process questions or are we going -- is the NANC going to take the NANC to a very different level than I've ever seen the NANC in all these years where we're actually going to define whether or not this process was lawful? You see what I'm saying?

So I'm still a little bit confused and I would just like not to be confused by the time we leave so that when I work with our lawyers back home I know what I need to be prepared to say and what we need to write and how. So is it the lawful question or is the process question?

CHAIRMAN KANE: I believe it's both. Telcordia has raised as the Chairman said, seven grounds for the complaint they say and those are the issues that

we need to address in trying to make a recommendation to the NANC on how to resolve the dispute.

MS. EMMER: Okay, so if we're going to let's just say for grins, if we're going to -- Sprint Nextel seeing as though (unintelligible) we're going to suggest to the team that we thought this was lawful because XXXX, if everyone else says the same thing then perhaps the NANC could make a decision that this was lawful or -- what I'm having a hard time with is I don't recall the NANC ever being in a situation where we're making a decision like that. Do you see what I mean?

Ultimately it gets to the point where we can have all this stuff on the record at the NANC but is this better -- at the end of the day I'm going to be put in a situation just like everybody else at this table to try to make a determination based on what you guys are doing, based on what you guys come up with are fine, and at the end of the day I'm not sure I want to make a decision as to whether or not it was lawful under the NANC umbrella versus going through you know some kind of -- more of formal process. So that's why I'm kind of still stuck.

CHAIRMAN KOUTSKY: Well, let me just state pretty clearly this is a formal process. The rule gives NANC the oversight authority over the LLC which has been challenged and also provides that the NANC shall resolve disputes about the administration, the number portability. That's a formal process. There's no distinction made in the rule between questions of law and questions of fact about dispute. It basically says dispute.

So if a dispute has been lodged with us we have the responsibility. It's not a

choice to be rather flippant. It's a responsibility that we make a recommendation.

Now as Karen pointed out what happens if NANC doesn't reach a consensus, those are all bridges that we'll cross but the fact is, you know, the rule is there. The rule has actually been there since there has been a NANC I think. Don't quote me on that but it's -- from the late '90s it has been there. This has been part of our formal charge and mandate.

So the issue as to whether or not this has been done, you know, it certainly hasn't been done in my tenure, whether it has happened before me I don't know but to a certain extent it doesn't really matter because the mandate and the obligation and the authority is there and so I think we need to proceed (unintelligible).

José was up and then we have a comment from the floor. I forgot to mention that anybody on the floor can talk if they want to but just raise your hand. You don't have little cards.

MS. EMMER: Can I just respond to something?

CHAIRMAN KOUTSKY: Sure, go ahead.

MS. EMMER: I just want to say for the record that Sprint Nextel really doesn't believe that this particular venue at the NANC is the place where we should be deciding whether something is law or not.

So I just want to say for the record, I'm totally okay going through this process. I appreciate who you picked for this process. You know, I'm looking forward to having the questions asked and I'm looking forward to being a part of it in that regard.

That said, I'm still a little bit worried at the end of day that the NANC is undertaking a task of determining whether something is lawful or not. Underneath the FCC's umbrella when I think of the general rule, it's the FCC's charge to do that and not us. Thank you very much.

CHAIRMAN KOUTSKY: And I'll use my prerogative to respond to that, that this is what NANC has been created for. I mean I do not see -- you know, for those that choose to be members of NANC, take on the responsibilities that it has and this is one of them and I will point out that the purpose of this is to provide a recommendation to the FCC. The FCC is the ultimate decision maker on this. I'll just point that out. So the question that the FCC should be making this decision not us is actually a non sequitur. José

MR. JIMENEZ: José Jimenez from Cox. First, I mean I look forward to the process as it works out. This will be at least interesting for me. Part of the issue, I mean part of what I am personally struggling with and trying to learn is how -- I mean it is such a unique situation that it required the creation of a resolution team which I think we're all going to look forward to the output and I think they'll do a great job, but it sounds like it was something that was -- the creation of the resolution team happened outside the realm of I don't -- maybe the rules of NANC, I am not sure.

You mentioned something earlier Chairman Koutsky that there were two things that drove you to nominate certain members of the resolution team. The first (unintelligible) was who was or was not a member of the NAPM LLC. And the

second one was who had a fiduciary interest who might be affected financially by the resolution of the dispute.

I suggest to you and to the rest of the Council that I don't foresee if this happens again and there is a need to create a resolution team again on an issue, I am not sure that there is an issue we deal with that doesn't hit some or all of us in a particular financial way.

So something that the Council I think if not now then long term ought to think through when resolution teams are created and who gets to be part of that team that comes up with the facts and does the interviews et cetera, because the second filter that you explained strikes me as knocking out all of the companies sitting around the Council who operate in the telecommunications business. I wanted to just make that point.

I don't think that necessarily invalidates the current resolution team at all but I think going forward it's something for us to think through for future disputes perhaps.

CHAIRMAN KOUTSKY: Yeah, and you raise a good point and I do appreciate that. That is a good point and I think that when I examined prior instances I was not able to find any good precedence so I did the best that I could based on the information I had but I think that taking your thoughts and concerns, the only point that makes me think about this is that this is the mandate, the charge of the team is to basically provide the initial (unintelligible) factor that in the end the decision does reside with the full NANC which does include all of the industry representatives and

participation.

You know, I don't anticipate it but we could take what Chairman Kane and Don say and say this is all great but you know it has nothing to do with the reality but I do not think that will happen because I have trust in their abilities but I do think that from this initial standpoint it was better to do it this way. But I do appreciate the point that you've made.

Anna from T-Mobile and then to Karen.

MS. MILLER: Anna Miller, T-Mobile. I also agree with Sprint's comments. I'm a little bit concerned with the NANC making legal or lawful determinations.

It's my recollection and I'm not sure if my files go back to the '90's but I do know that I did participate on the NANC in the late '90's and it's my recollection when it came down to purely legal issues I think there was one time when we came to that bridge, that the NANC turned to -- created a legal committee to make legal determinations and if my recollection was correct it may have been around what should be the legal definition of neutrality as part of the creation of the NPAC.

So I just want to say that T-Mobile shares those concerns and it's a little bit uncomfortable with making legal determination I guess absent legal advice. Thank you.

CHAIRMAN KOUTSKY: Those are noted. Karen.

MS. REIDY: Process question. I was just curious in terms of if you did want to give say input on what you thought the legal analysis was, is it just in terms

of after July 31st, would you just submit an e-mail that you would then post on it or are we actually supposed to post it on this website?

CHAIRMAN KANE: No, you submit it to us. I think we'd prefer something more formal than an e-mail.

MS. REIDY: More formal than an e-mail, okay. Thank you. I meant send the comments via e-mail.

CHAIRMAN KANE: Send it in electronically but then it will be posted. You will be able to post it directly on to the website but it will be noted as received and then posted.

CHAIRMAN KOUTSKY: Question from the floor. Take an open microphone.

MALE SPEAKER: I had a question on the process. I do by the way agree that the petition does raise both legal and process issues or they're (unintelligible) the dispute. I had a question though about the process, Chairman Kane, that arises from your response to Rosemary from Sprint Nextel. The question really was, the way that you had laid out the process in your memo it seemed like there would be written submissions by anybody who wanted to have first round written submission by July 31, but it sounds like people can sort dribble those in afterwards which I understand but that also means that from the complainant's perspective especially on these legal issues, we won't actually know what the different legal issues are that other people -- their responses to our legal arguments.

We've laid out our legal argument. We won't know what their responses are

and we will need to reply to those at some point in time. If those are sort of dribbling through the month of August we may not actually be able to respond before your recommendation is due.

CHAIRMAN KANE: I appreciate that and I think in response that we would like to send the e-mail say August 15th for a deadline on that and then it would be another week to respond after that. We have to have a cutoff date in order to do a report, a draft report to get it out. So let me say the 15th of August, is that right Don, for kind of the second round?

MALE SPEAKER: So just to be clear, people would file first round by August 1, anybody could file additional things by the 15th of August. I guess I would ask as the complainant that if somebody files additional argumentation that's not raised in the first round by the 15th that we'd still be able to file something after that just so we ought to be able to respond to any new arguments that are made.

CHAIRMAN KANE: I think that's fair.

MALE SPEAKER: Thank you.

CHAIRMAN KOUTSKY: Hank.

MR. HULTQUIST: Actually John raised a really good point which is how do we make sure that to the extent legal issues are relevant to the resolution of this that they are actually joined appropriately to any (unintelligible) to make a decision.

So I'd like to throw out the possibility that once we get a recommendation and if that proposed resolution is objected to by one or more of the parties that we should think about the possibility of asking for the equivalent of some sort of

response to any legal questions that the Council has that it thinks have not been joined appropriately at that point in time to enable them to reach a resolution.

CHAIRMAN KOUTSKY: Yeah, I think that's good input and there was already a bit of -- there was a target date for circulation and there would be an invitation for comments on that and I think that would be part of it.

These are all really good suggestions and I would actually suggest that one thing that we'd probably do is sit down and probably incorporate and encapsulate as many of these as we possibly can, then come up with something updated. This is why I wanted to have this discussion. I think Jerome was next or was it Jeff? Jerome, go ahead.

MR. CANDELARIA: (Off microphone).

CHAIRMAN KOUTSKY: Jerome, please speak into the microphone.

MR. CANDELARIA: Excuse me. You use the term file and I just wanted to clarify it's a submission to you. You don't expect copies to other parties.

CHAIRMAN KANE: It will be on the website. That will save a lot of trees.

MR. CANDELARIA: Great.

CHAIRMAN KOUTSKY: Jerome, did you have anything more?

MR. CANDELARIA: No, I didn't. When I said file I was using that term generically so I did not want my meaning to suggest something different.

CHAIRMAN KOUTSKY: Jeff.

MR. LANNING: I'm just trying to understand. This is Jeff Lanning

with Embarq. NANC decides legal questions all the time. I mean they are legal questions in the sense of whether something complies with the rules or not but there is something more going on here and I'm just trying to understand.

Is our concern on the legal thing really assessing whether NAPM followed the laws? In other words, it's sort of sitting in judgment of another body, a review function and is that maybe why we need special legal process or are we going to treat that as the same as anything else in terms of what complies with FCC rules?

CHAIRMAN KOUTSKY: I'll answer that. It's because the complaint involves both legal and factual as to what certain people at certain points in time -- from that standpoint that's where I think I have a distinctive process to look at that.

When it comes to legal questions if it was purely somebody had essentially said, hey is this a good idea or is this a lawful thing, you know, that would have been something we possibly could have handled through a different process but given that we have questions over certain factual predicts that are mixed in with the legal question, that's the reason for doing this.

And I think you're correct, I don't want to say it's standing in review of what something else did. It's just that the portability LLC operates subject to oversight by NANC so I do think we need to respect that process and the rule that says they operate subject to NANC so when NANC reviews it NANC needs to in fairness to them to take it seriously and also to have a particular process that's more formal than just, you know, (unintelligible).

MS. EMMER: Rosemary Emmer, Sprint Nextel. Just about the timeline,

I'm beginning to realize that there's going to be a lot more work involved in this than I initially thought there would be and I'm wondering or I'm going to try to plead with you guys to push these dates back.

I'm not sure why we're in such a hurry. Please recognize and I'm actually pleading here, please recognize the fact that we have everyone at this table who has to go back and talk to their LLC people, talk to their technical people.

In order to even write two pages, I have to go back to two people that are in this room that have been working on these intermodal issues. They've been working under the LNPA working group. They've working under the LNPA working group. They've been working on these subcommittees. They're tired. They would like to go on vacation just like I'm going go.

I mean I'm totally pleading with you here, that plus there are so many big tickets items that we have open right now. There's just a lot. You know, they're traveling all the time. I mean they're just getting in from Ottawa late last night coming to this meeting today.

I just really think that -- I'm trying to sit here and think well, why are we in such a hurry? I mean couldn't we push this back another month or two? If we're not making a process of this particular team under some kind of rule -- like I was looking for, this document, I'm looking for the rules, and it says something about four months in here so you know I was going to possibly quote that but if we're just kind of putting this together and trying to do the right thing by this issue altogether on both sides and being fair on both sides of this issue, why do we have to work it so

quickly? So I would just plead on behalf of Sprint Nextel that we push the dates out maybe in a month or two. Thank you.

CHAIRMAN KOUTSKY: Don, your little thing was up.

MR. GRAY: Don Gray, Nebraska. I will let you go ahead and respond to Sprint Nextel's pleading.

MR. KOUTSKY: Well, I mean I don't want to speak for the three of us because the three of us haven't conversed. I mean I am well aware of the amount of work that people have been doing on this and I do appreciate all that work and I would just say that at the same time I don't want things to linger.

You know, I don't want -- if somebody files a dispute I don't want it to linger for a long period of time without resolution but I think that the three of us may come up with a recommendation.

Again, this was a marker as to a target date and seeing whether we could get a resolution on this at a fall NANC meeting that's going to be required by the FCC rules. So that was the initial thing, just kind of working back from that. But I think that's something we will definitely take into consideration but I don't want to speak for the three of us right now since they're all the way over there and I can't talk to them.

CHAIRMAN KANE: And the dispute was filed in May and this is our first meeting we've had in some time so it's appropriate to bring it here and to get started on it. Very well if we get into it and find that it's just more complicated then we thought and people are not able to respond, we would certainly be able to look at that

but I just say again after we get a draft there's going to be at least almost another month before there's a NANC meeting if we do have one at the one at the end of September and I believe because of another issue that's coming up we're going to have to have one before the end of October, another NANC meeting. We can try to work within that framework and see how it works.

CHAIRMAN KOUTSKY: Anna.

MS. MILLER: Anna Miller, T-Mobile. I would like to make two points. First of all I reiterate and maybe I add a T-Mobile plea as well at the LNP Working Group to follow up with our FCC direction on the NANC flows and the definition of one business day for the implementation of the one day porting interval, it's just phenomenal the amount of work that's been done and I've been very pleased with the progress and the cooperation of all the participants to do that.

You know, there were five groups that spun off to address the various issues, that have been meeting at least weekly for the LNPA working group, meeting four days, the LNP working group meeting to status -- summarize progress of that work this month. I don't know how much caffeine Gary Sacra is going to have to have to keep awake this afternoon.

(LAUGHTER)

But it's just been a horrendous workload by a lot of individuals with great progress that I'm very pleased with but I guess I don't see -- you know, we've debating this since at least 2005 and given the priorities and the workload that's on all these working groups and the individuals that participate on these working groups

or individuals that provide technical input to the LLC or individuals that will need to respond to this, that maybe pushing it out one month isn't a big delay. I wouldn't really consider it a delay.

Maybe it would provide better clarity if individuals were able to reflect with all their other workload, maybe recharge a few brain cells. So point one.

Point two, in response to the questions that Embarq had, I think the concern is kind of the commingling of technical and what's lawful. I think what may be at contention is you look at what is the scope of the NPAC and based upon that scope what are the interpretations of that scope both at a technical level, and then how does that transcend to what's lawfully in their scope and not in their scope.

So I think there's a co-dependency there and that's the concern that I have and I think at least at one point in the late '90s the NANC kind of reached that crossroad where okay, technically here's what needs to happen, how do we lawfully interpret that? So I think that was the concern that I was trying to express. Thank you.

CHAIRMAN KOUTSKY: Having heard all that, Cindy.

MS. SHEEHAN: Cindy Sheehan, Comcast. I would say that I agree that there's a lot going on in the LNPA but I believe that if you get started and then much like you've suggested, if you get into it and you find out that you need to extend the time then you just update NANC and say we need additional time to push it out but I think not letting it linger is a good idea but getting started on it is great.

CHAIRMAN KOUTSKY: Anything further? John.

MALE SPEAKER: (Unintelligible) we do believe we're being prejudiced every day that this implementation goes on, that we do not believe it is lawful and, you know, if the FCC were to grant our request for a standstill order that would alleviate the issue but it hasn't so far so we do urge prompt resolution. I recognize there's a lot of other competing demands on the NANC.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I just don't understand why there would be a comment that you would be feeling prejudiced against this. After all at this point at the LNPA working group there are over 100 items on a parking lot list where we're trying to figure out -- along with doing all of these intermodal issues that we're working on right now for the federal government.

We have at least 100 coming down from 200 items on a list to work through and a parking lot list for whether or not it could be technically feasible to have another vendor there so I have a little bit of trouble trying to understand why you think it's prejudiced when we're asking for just a little more time. Thank you.

MALE SPEAKER: I'm sorry, I used the word and I think you may have taken a connotation -- when lawyers say prejudiced they mean their client is being harmed by the delay and not to mean a motivation for the delay. I apologize for that but Telcordia believes it is being harmed by the delay, that the implementation of these fields is not proper and so that's the issue and that could be debated out, but that was what I was meaning to suggest, not to suggest there was motivation behind a suggestion of the schedule -- recognize completely they have been under.

CHAIRMAN KOUTSKY: Okay, sensing a natural breaking point for a

number of reasons.

(LAUGHTER)

We'll just pick up the agenda after the lunch. I think that's probably the best thing unless anyone really feels that they have like a flight to catch. I've already checked with Faith, we'll just pick up.

MALE SPEAKER: We need a Exhibit number for --

CHAIRMAN KOUTSKY: Yes, the July 14th memo from Chairman Kane and Don Gray becomes Exhibit 9. And I also mentioned in the context there were a couple other documents that have been circulated and I think probably should be plopped into the record on this as well so I'll endeavor to do that over the next day or two. We're going to take a full hour break because I say less, it will turn into an hour. But we're going to make a real hour. We're going to start at 1:00 p.m. 55 minutes, okay. We'll be adjourned.

(Lunch Break)

CHAIRMAN KOUTSKY: All right, if people could start making their way back. I know I broke my own rule. It's after one o'clock but we did the best we could.

You know, I flipped agenda items and then we had lunch during the break so I think we'll just kind of pick up where we left off which was item seven which is the INC. Are you ready to go Adam? And we'll just go straight through and we'll try to move along as expeditiously as possible so we can get out of here by 3:00 p.m. if at all possible.

So this is the Industry Numbering Committee report which is somewhere in your stack.

REPORT OF THE INDUSTRY NUMBERING COMMITTEE (INC)

MR. NEWMAN: Good afternoon. I'll try my best not to put everybody to sleep after the nice lunch. I'm Adam Newman. I work for Telcordia Technologies, and I'm chairman of the ATIS Industry Numbering Committee or the INC.

We have a new Vice Chair person. Natalie McNamer from T-Mobile was recently elected Vice Chair of the Industry Numbering Committee. Robin Smith from Verizon Communications, our former Vice Chair moved on to a different position within Verizon and we just wanted to acknowledge Robin's service to the committee for many years who provided a great service to the Industry Numbering Committee.

INC since our last meeting, since our last NANC meeting, has had seven face to face meetings. Our next meeting is August 10th through the 14th. That's actually our second attempt in the last seven years, that a virtual full INC week of virtual meetings and we'll see how that goes.

As usual NANC members can get information from INC by sending an e-mail to the contacts in the Industry Numbering Committee to get access to INC issues if they don't already have them.

First I'm going to report on a number of NPA subcommittee issues, NPAs numbering plan area also known as areas codes and we have a subcommittee that's

dedicated to the assignment and management of those as well as the other NPA resources.

INC issue 589 was Sint Maarten's application to join the North American numbering plan. John Manning from NANPA reported to you this morning that application has been approved. The NPA allocation plan and assignment guidelines provide the information as to how new NPA entrant applies to join the NANP by applying for an area code, an NPA.

So they did send that application into NANPA and NANPA per the guidelines brought it into the Industry Numbering Committee for its technical regulation.

The NANPA also per the guidelines sought comment from all of the other NANP member nations as well as other impacted industry forms and there was no objection to Sint Maarten's application to join the NANP but we did receive back or NANPA received back and forwarded it to INC, a number of concerns about the number optimization impacts of assigning an entire area code which contains just under 8 million numbers to a fairly small island nation, actually extremely small island nation.

We recognized those concerns but the guidelines as they are written and approved, the application complied with it so the INC did recommend for approval and assignment of NANP application to Sint Maarten, determined that it did meet the guideline criteria and subsequently that application was approved.

There has been some discussion at INC of the potential for an issue to make

some changes to the guidelines in this area. For example, the idea of area code sharing was raised by some of the commentators but we have yet to have submitted such an issue.

That was our first two full slides. INC issue 559, also in the NPA subcommittee was brought in to revise the NPA code relief planning guidelines to address customer complaints.

Implementation of an area code split as many of you know is a fairly complex endeavor. Due to issues that surfaced as a result of a geographic split in one state this issue was introduced, submitted by NANPA as I recall and accepted by INC to provide some greater detail as to essential issues to be considered during relief implementation.

So as a result of this issue INC created a new appendix F, the NPA code relief and planning guidelines. That contains two tables, one to address a split and another to address an overlay. They put it down and we essentially brainstormed and used the feedback we got, the potential issues that a customer could experience as a result of a split and overlay and what the solutions to those issues may be as a way to help prevent further problems whenever area code relief is implemented in the future to try to learn from the issues that were resolved.

So that issue has gone final and it is in the NPA code relief planning guidelines but we saw that one as sort of success and was addressing customer issues and we thought NANC might like to hear about that.

Issue 579, NPA relief and pANI resources, INC added guideline language to

both the pANI, the final pANI administration guidelines, and the NPA relief planning and notification guidelines to address the RNAs participation. RNA is the routing number administrator within the NPA relief planning activities so that consideration could be given as to what functions the RNA would undertake to make sure that the RNA resources were appropriately considered in NPA relief planning and implementation.

That issue is an initial closure. Actual implementation is pending approval of the PA change order for permanent pANI administration which I'll talk about a little more later on a different slide but it was also raised as part of the PAs report earlier.

We're on slide seven and we're moving on to the CO/NXX subcommittee. Issue 577 was brought in to limit test numbers to assign blocks. The objective of the issue was to make sure that a code holder (unintelligible) and now it's just code holder isn't it? Did we close that issue? It's still open, okay.

Code holder (unintelligible) assignee would establish an actual test number that gets published for test calls only within a block that was assigned to it. There were some cases where a test number could be assigned from a block that a code holder had not retained or was not assigned and that block can subsequently be assigned and it wouldn't be testing the actual routing of that CO/NXX code.

So the guidelines were update to add language such that the test number should be within an assigned or retained code of a CON/XX holder.

In addition, text was included in the LRN assignment (unintelligible) in the Thousands Block administration guidelines to encourage consolidation of admin

numbers, administrative numbers in blocks retained by or assigned to the code holder (unintelligible) assignee and to require that the service providers disconnect the test numbers and LRNs in a block before donating and returning a block.

So there were some number resource optimization measures that were also taken as part of this issue and there was guideline language added that prevents issues on a going forward basis when somebody goes to return a code or a block that they no longer have test numbers (unintelligible) in those blocks before they return them.

Slide eight, issue 611, augmenting the NRUF verification procedures. John Manning from NANPA spoke to this issue a little bit earlier so I will try to be brief going over it.

The NRUF guidelines required some modification to improve the verification procedures used by NANPA to try to insure that all assigned resources were being reported on in NRUF to NANPA by the resource assignee.

The INC made changes to the guidelines to clarify both the service providers and NANPA's responsibility for reporting and verification of all allocated codes and blocks. As Mr. Manning noted earlier, NANPA submitted change order 18 to implement these changes. This is part of that issue that the action item was assigned to the NOWG as noted here.

As part of this issue INC determined that no changes to the NRUF guidelines were required for the reporting of intermediate numbers. I know that the NOWG chairs were going to be doing some research so from INCs perspective there was

some work done around that issue and this issue.

CHAIRMAN KOUTSKY: All right, I appreciate that and so both sides are now aware of looking at that issue. I'm sure the NOWG will be following up with you to find out how you came to that conclusion.

MR. NEWMAN: Issue 584, updates to the pANI guidelines. As Amy Putnam reported from the PA, the FCC has requested a change order from the pooling administrator for permanent pANI administration. A review of that request by the --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 2, SIDE A)

* * * * *

(START OF AUDIOTAPE 2, SIDE B)

MR. NEWMAN: Indicated to the PA a need for clarification to the pANI guidelines in a number of areas in order for them to complete and submit that change order. Some of those areas are listed. I won't read them all. The Industry Numbering Committee with input from ATIS emergency services interconnection form ESIF clarified and modified the pANI guidelines and its attachments.

We also note here as Ms. Putnam noted that the PA has submitted questions on several issues to the FCC. Responses to those questions and submittal of the change order are still outstanding.

This issue is in final closure from INC's perspective but there's an underlying issue adopting the original pANI guidelines that remains in initial -- pending the

FCCs action with regard to the permanent pANI administration and that's actually in the initial pending slide which is towards to end of the deck.

Issue 596 is a related issue. It's a request by the RNA to set aside a new NXX for pANI administration because if permanent pANI administration is not in place the RNA can't maintain accurate and complete forecast data because they are not doing pANI administration in all cases.

There are other parties doing pANI administration while they're still under interim pANI administration. So they can't really tell how soon current pANI's were going to exhaust for certain so they asked INC to determine and set aside the next NXX that would be used to pANI administration.

INC did correspond with ATIS emergency services interconnection form, the ESIF and the determination was made that there were no reasons not to use 311 as the next NXX for pANI administration and then NXX has been set aside as the next pANI resource.

CHAIRMAN KOUTSKY: Just kind of following up on that, so when would 311 start to be used, it would triggered when, because I mean if you can't forecast exhaust how do you know you're exhausted?

MR. NEWMAN: Essentially it will come down -- and Amy should feel free to step up as well, but so two things have happened. One, we have made some guideline changes in the final pANI guidelines around this but of course that issue overall is still pending.

What it will really come down to is in the pools they administer they will see

themselves running out of the resource and put out notice for using the new resource 311 on an NPA by NPA basis and in pools where they don't administer it there will have to be some communication.

CHAIRMAN KOUTSKY: Okay, so it will be on a pool by pool basis.

MR. NEWMAN: That's the way I suspect it will work under the interim pANI administration. Now keep in mind under interim pANI's in some cases dialable resources are still being used as pANI's. It's not just the pseudo pANI's that have been set aside nor being administered by the interim RNA.

CHAIRMAN KOUTSKY: Even though we can't forecast because there are other administrators out there, is this an issue of weeks, months, I mean is there any sense as to -- how imminent is imminent is probably a bad question structure but I mean are we talking this is something that we could start to see 311 start to be used next month in some areas or is it something that we think might happen maybe by fall?

MR. NEWMAN: I don't think INC has been warned about imminent exhaust and use of 311 in any case yet. I don't know if Amy or the RNA has any update other than that but we have not been warned of any imminent exhaust.

CHAIRMAN KOUTSKY: And this would be resolved if we had a permanent pANI administrator or be --

MR. NEWMAN: The ability to provide forecast information would likely be resolved by the presence of permanent pANI administration. Forecasts are however forecast.

CHAIRMAN KOUTSKY: Okay, understood. Okay, thanks.

MR. NEWMAN: Issue 627 updated section 5.7 of the pANI guidelines to include steps for notification of a new NXX as outlined in correspondence from ESIF so as I did mention in the previous slide, we did put information into the permanent pANI guidelines as to how to notify and when to notify the industry of a new NXX but again -- so there are timeframes here.

The RNA will notify all applicable parties no less than 12 months prior to implementation. But again these guidelines are not in effect today because they are part of the permanent pANI administration guidelines.

Okay, and that was all for the pANI issues until we get to the initial pending one.

Issue 591, change the timelines of the part one and part three processing for the North American Numbering Plan Administrator, NANPA.

As you may recall there was a PAS to NAS, a pooling administration to NAPM administration system interface that was developed. That interface enabled submission of this issue to reduce NAPMs processing time from 14 to seven days.

INC updated both the central office code assignment guidelines, the COCAG and the Thousands Block administration guidelines to reflect the reduction in this processing time.

In addition, as part of this issue we added a check box to the part one and the part 1A so the part one is the application for a central office code and the part 1A is the application for a Thousands Block which allows SP to indicate a request for the

earliest standard effective date which made processing automatically easier to the program.

That issue actually leads us to an old and long standing issue that has been closed and then put in initial pending from INC for quite a number of years now. Issue 407, treatment of dedicated codes for single customers in a pooling environment.

Issue 407 had been in initial pending since the FCC rejected the related NANPA change order and the NANC recommendation for a rule change, so NANC three or four years ago recommended -- reviewed the INC issue after it was rejected, the change order was rejected by the FCC and made a separate recommendation for a rule change to the FCC to allow central office code applications in these cases to be submitted directly to the NAPM and not have to go through the PA for codes -- or dedicated codes for a single customer in a pooling environment.

So in the interim, in the intervening years while issue 407 was in initial pending, a number of issues resolved and actions occurred which addressed almost all of the items that were incorporated into issue 407.

INC issue 440 was resolved and it resulted in COCAG and TBPAG changes that gave service providers submitting an application the option to request that NXX be marked as non-pooled in BIRRRDS which is the Business Integrated Routing and Rating Database System.

That's the database that produces the lower (unintelligible) in the case of dedicated customer in a pooled environment so in essence you didn't have to pool a

code and put ten records into the (unintelligible) for these dedicated customer codes with the resolution of issue 440.

INC issue 522 resulted in guideline changes that gave service providers the option to submit the part four confirmation of code in service directly to the NAPM for these types of codes. So they couldn't apply directly for them but they can confirm in service to one place.

In addition as I reported in the previous slide, the PAS NAS interface was implemented and this allowed service providers to enter part one forms directly in PAS that would then be transmitted to NAS for the NANPA and that was implemented in February 2008.

So this will replace the former manual process where a service provider would have to manually fill in a part one and provide a copy of that part one to the PA for forwarding either physical facts or e-mail forwarding to the NANPA in addition to applying for Thousands Block in PAS so they were performing two processes for this one resource.

So they can fill out the part one application online with Thousand Block application with PAS and in addition one of the concerns with this issue was that it took too long to have both a PAS interval and a NAS interval to provide codes to these high value customers or these dedicated customers.

But Issue 591 as I previously reported reduces NANPA's processing time from 14 days to seven days, cutting by 50 percent NANPA's processing time and the time it takes to get resources for these dedicated customers.

Essentially what it comes down to is we took care of almost all of the problems that were around this issue without the rule change and with the reduction in time interval we almost got to the same result in time interval as we would have if they had been able to apply directly to the NANPA, 14 days because it's seven for the PA and seven for the NANPA, now it was seven and 14 so we're still at 14.

All these changes put together resolved issue 407 and we put issue 407 back into final closure after approximately five years. So we actually thought of this as a pretty big success, essentially sort of went around it and solved it anyway.

So what does that mean to NANC? It means NANC has a pending report with the FCC recommending a rule change which from the Industry Numbering Committee's perspective said rule change may no longer be necessary.

CHAIRMAN KOUTSKY: So you think that we should just send a letter to the FCC in essence pulling it back, withdrawing it, would that be a recommendation or should I recommend that be something that we explore?

MR. NEWMAN: From INCs perspective we no longer see the rule change as necessary. NANC may not have that same perspective but it was NANCs report that made the recommendation.

CHAIRMAN KOUTSKY: Okay, I'll open that up. Do people have thoughts on this? I remember this issue somewhat vividly from my first year. Myself, if the Industry Numbering Committee thinks that the problem that originally led them to make the recommendation on 407 is no longer present or has been resolved through other changes, I would be willing -- I think it's probably a good

idea to pull it back from the Commission, just to at least keep the decks clean. Other thoughts? Anybody objecting to that?

Okay, then I will send a simple letter to the Commission saying just that. And I do appreciate INC's work on this. I mean I think it's good that you were able to take care of the provisioning. I knew this is a significant provision interval but to take care of the provisioning interval through other changes I think is important and I know you guys have been working hard on it for obviously several years.

MR. NEWMAN: And it wasn't only INC's effort right, the NOWG wrote the requirement that included the requirements for the interface and NAPM (unintelligible) the work to build the interface in such a way that it was effective for the industry.

CHAIRMAN KOUTSKY: I'll probably need to talk to you directly to put that letter together in terms of getting reference et cetera but hearing nobody objecting I'll do that in the next few days.

MR. NEWMAN: No problem. Okay, INC issue 585, blocks with over ten percent contamination, this issue was submitted and accepted. INC developed a new process that helps remove over contaminated blocks from the pool when those blocks are identified in a pool.

What does it mean? When a block is identified as being more than ten percent contaminated, the PA will look for a new block holder for that over contaminated block and will not place that over contaminated block in the pool. If the contaminating ports -- so those actual TNs that are ported out, belong only to the

(unintelligible) assignee for that underlying code of the block, the PA shall ask the (unintelligible) assignee to place the block back into its inventory.

If the contaminated ports belong to multiple service providers the PA will ask the service provider with the most ports to become the new block holder. This process is similar to the process that's followed for when a block is abandoned.

If the service provider with the most ports does not submit a part 1A to become the new block holder, the PA shall ask all service providers with ports to submit a part 1A to become the new block holder. First one wins.

If no service provider with contaminating ports submits a Part 1A to become the new block holder the PA shall ask the appropriate regulatory authority to approve within 30 days the disconnect of all contaminating ports so the PA may place the pristine block in the pool. Ask nice several times and then ask the regulator to be the hammer.

No questions?

Issue 602, checking a returned block in the NPAC. This is a somewhat related issue. To prevent a return to block that is more than ten percent contaminated from being placed back into the pool, the PA will ask for an NPAC ad hoc report to determine the contamination level of every returned block.

A service provider exiting the market may return over contaminated blocks so the PA can provide a new block holder. Service providers not exiting the market may not return over contaminated blocks. The PA shall deny the return.

The INC requested and the NAPM LLC promptly approved the PA receiving

ad hoc reports from NPAC for all returned blocks. This new process helps eliminate over contaminated blocks from being placed in the pool and this issue is initial pending. I think that's one of the change orders that is being implemented July 24th in the next PA release.

Issue 614, handling block reservations in jeopardy situations. Service providers today may reserve Thousands Block only when seeking a safety valve waiver. However, the Thousands Block Pooling Administration guidelines do not specify how Thousand Blocks reservations should be addressed when an NPA is declared in jeopardy.

In most jeopardy situations NXX codes are set aside for the PA and not subject to lottery or rationing and all code reservations are cancelled automatically. All service provider code reservations are automatically cancelled by the NANPA when an NPA is placed in jeopardy.

INC agreed because Thousand Block reservations are limited to safety valves, the PA should maintain the block reservation during a jeopardy situation. INC added text to the guidelines to allow block reservations to be maintained during a jeopardy situation. Make sense? That issue is in final closure.

And the final issue that I wanted to report on was issue 497, identify potential changes to the INC guidelines based on NANCs report and recommendation and I'm reporting on this relatively old issue.

Per the NANC action because it's from a NANC action item, NANC gave INC an action item to review the VoIP service providers access requirements from

NANP resource assignments which was done by the future Numbering work group in July '05 and draft changes.

So we reviewed that and our task was to review and draft changes to the INC guidelines that might be affected by direct assignment of numbering resources to the VoIP providers and we were supposed to also reach out to other ATIS forums to see if there would be impact on their work and the latter part actually took a little longer than doing the work at INC.

INC did this work. We drafted changes to relevant sections within four of our guideline documents. As I recall they were the Thousand Block assignment guidelines, the CO code administration guidelines, the TN administration guidelines, and the NRUF guidelines.

And we also reached out to other ATIS committees and asked them to do the same. Generally they reported back that such changes weren't necessary or they would make them upon FCC order for assignment of numbering resources to VoIP providers.

In June 2008 we tabled this issue pending action by the FCC to order such assignment of numbering resources to VoIP base providers.

So from our perspective this action item is complete until the time such order is issued.

So slide 18 is the list of issues that are pending. Issue 534, development of pANI guidelines, so that is the first final pANI guideline administration document that's pending. The submission and approval of the PA change order for permanent

pANI administration is the RNA.

INC issue 592, changes to the TBPAG and COCAG from mass update modifications, this is one of the issues that is part of the release that's going out July 24th as is issue 602, I think, is that right? All right, thank you.

Checking the return block in NPAC, I reported on as I did issue 611 augmenting the NRUF verification procedures, that is the NOWG report is pending - - it takes a year to implement so it's pending the next NANPA contract.

And issue 628, clarification of the elimination of the seven digit dialing between states during implementation of (unintelligible) is also pending a change order.

Slide 19 is the issues that are in initial closure. Assuming there is no objection from any participant, these issues will go final the end of this week as I recall.

And the next four or five slides are the 66 issues that INC has closed since the last NANC meeting. It's a listing of them. I'm not going to read them. I'm not going to try to detail them for you. If any NANC members have a question of any of 66 issues they should please feel free to contact me and I will be glad to go over the issue with them in as much detail as they care.

And our final page just links to the relevant INC websites. So thank you for your time. Any questions?

CHAIRMAN KOUTSKY: Thanks a lot, Adam. I appreciate it. Jerome.

MR. CANDELARIA: Jerome Candelaria, NCTA. Adam's report raises

the prospect of co-chairing among Caribbean nations within the NANP. I notice Jamaica is no longer participating so I would think in the event that issue finds its way back up here I hope a Caribbean nation is able to rejoin the NANC or have some participation from an entity that can be affected by co-chairing.

CHAIRMAN KOUTSKY: Good point, very good point and I agree. I think you said that was relatively recent in terms of --

MR. NEWMAN: So we don't have a current issue to consider sharing NPAs among Caribbean nations. It was suggested as an alternative to assigning the NPA code of (Unintelligible) but such an issue could come in and I would presume that INC would at the very least correspond with affected parties such as the Caribbean nations.

In the past we have had some participation for example from cable and wireless in our NAPM workshop when we were looking at the recommended plan for expanding the North American Numbering Plan. So point well noted. Good point.

CHAIRMAN KOUTSKY: Any other thoughts on the INC report? Questions? Again, I appreciate all the work that INC does in terms of doing an amazing amount of work on all these issues. So I appreciate the time. Yes, that's Exhibit 10, the INC presentation that Adam just gave.

**REPORT OF THE NORTH AMERICAN NUMBERING PLAN BILLING
AND COLLECTION (NANP B&C AGENT)**

Now we'll move on to the presentation by Billing and Collection Agent, Welch & Company. And that's this document by Welch. It will be called Exhibit 11.

FAITH MARCOTTE: Faith Marcotte, Welch & Company. Good afternoon. We are now going to talk about the financial position of the fund. In our report on page one we show the statement of financial position. There's about \$3 million in the bank at the end of June.

We have receivables from U.S. carriers of about a million and a half. In total the receivables are a million and a half. The reason that number is so high is because we just sent out the annual billings in the month of June for the coming year.

In accrued liabilities the makeup is shown just about two quarters of the way down the page. There is deferred income of about a million four because there was billings, that million and a half billings, most of that does relate to the future year so we put that money aside for the coming year. So that leaves the fund in a balance at the end of June of \$2.792 million.

Just some other items of note, the interest rate is not very good right now. We just earned \$3.00 of interest on that \$3 million in the month of June.

In February we started a budget process working with the working group overseeing the billing collection working group. We came up with three alternatives for the contribution factor and came to the conclusion that we would use up the

previous years surplus and bring the contingency balance down from a million to a half million.

There was an e-mail sent out to all the members of NANC since we didn't have a meeting to get everyone's approval and that ended up being accepted, that factor that -- we ended up using up the surplus from the previous years' build-up.

We projected back in March of a surplus of \$2.775 million and the actual surplus was \$2.792 so it ended up being very close.

On the next page there's a forecast -- well, we see a comparison of last years, what actually happened compared to the budget. That's in the shaded area on that page. We ended up with \$2.792 million and we were expecting \$2.2 million and in the center bottom of the page there you can see where the reconciliation of the difference is.

There are a lot of items in there but the bulk of it relates to, we put money aside for operation audits of the carriers, \$700,000, and none of that was spent so that's the bulk of the difference between what we anticipated and what we ended up with.

On the right side of that page is a projection of the fund for the upcoming year and if you look under the June column there, June 2010 column, you can see we're going to end up -- we have the \$500,000 of contingency and at this point we're looking at maybe \$80,000 of surplus. Are there any questions about that?

The next page is just a projection of the bills we expect to pay over the next six months, what has been approved and not approved yet by the FCC for payment.

And the final page, this is a report we give to the working group every month just what has been going on. So we did send out our annual invoices in June for the next year and there are not really a lot of other items of note.

We do have a process for questions because when we do send out these invoices we get a lot of questions on what exactly is NANPA, and why should they be paying, and why would they charge late fees so we have a system to handle all these calls.

And we're working away at clearing up all the old receivables with the help of the FCC, getting their approval for any that we find are inactive and end up writing off or dealing with in various ways. Are there any questions?

CHAIRMAN KOUTSKY: I don't have any. I appreciate the work. Maybe Rosemary can come up and provide the working group report on this. Thank you for the presentation. And this is the Billing and Collection Working Group report which is a Power Point which will be Exhibit 12. Rosemary.

REPORT OF THE BILLING AND COLLECTION WORKING GROUP

MS. EMMER: Thank you, Mr. Chairman. Rosemary Emmer, Sprint Nextel. I chair the committee with Tim Decker with Verizon who is sitting behind me and who is here today.

I wanted to just quickly mention a good job to Welch & Company and Faith for being so right on with the projected versus actual. I'm sure many of us in this room would like to get that close in the early basis, so thank you.

CHAIRMAN KOUTSKY: Especially last year.

MS. EMMER: Yes. So the Billing and Collection oversight committee is clearly chartered by the NANC and we're responsible for overseeing the Billing and Collection agent in terms of their functional requirements and so basically that means we provide basic oversight.

Currently we are handling on a regular basis the monthly billing and collection oversight, the evaluation of their deliverables every month. We have budget and contribution oversight generally, we work on that and look at this every month and we recently completed the LLP or the Welch LLP performance evaluation for 2008.

Faith just went over the contribution factor so I won't repeat that. I should note though for the record that we did two things with our contribution factor. We used up all the surplus so it is significantly lower than the contribution factor was last year. And I'll reiterate what Faith said, we went from \$1 million contingency to a half million contingency so we did make kind of a lot of progress, a lot of future progress making that contribution factor lower this year.

Page five, we developed the evaluation for the performance review. We developed the evaluation consistent with the monthly deliverable matrix that we go over every month on our conference calls.

We used the rating schematic for their performance evaluation to be Met or Not Met. In order to perform the evaluation we considered many different venues in order to get to our overall rating. We used the monthly deliverable matrix, the overall score that I was mentioning earlier. Any kind of team meeting materials

from our monthly calls, any kind of reports that Welch and Company -- in submitting any kind of observations.

I want to make absolute note that Welch & Company puts together and has for the last two years a yearly operational review which is out of this world fantastic. Absolutely fantastic.

You can look at this report. I don't even know how many pages, six or seven pages, less than ten pages I'll say and you can see exactly what happened every step of the way all year. It's a really fantastic report and if you don't have it, if you'd like to e-mail myself or Tim I'd be happy to share it with you.

This year Welch & Company LLP rated a Met. They met all of their performance requirements and like I said it was only Met or Not Met so they did a fantastic job.

I want to definitely note some of their achievements. They processed \$96K in bad debt over the last three years. They identified a bank error that was corrected within 24 hours. They prepared like I mentioned before this fantastic operational review, I'm actually going to call it stellar, it was excellent in 2008, without being given a deadline to even give that to us and we did not prompt them to deliver it which I find wonderful.

They did a remarkable job managing the red light rule in the delinquent account procedures and there were no performance improvement plans identified for this year.

On Page nine. Welch & Company puts together this fund size and

contribution factor over time like a timeline so you can very clearly see what the contribution factor has done since 2000. So just note the very last column is for this year and that it's down from last year.

And members of the B&C working group, At&T, Bell Canada, Cox, Comcast, CTIA, Sprint Nextel, Qwest, Verizon and 800 Response. We would be thrilled to have participation underneath this umbrella. We welcome any new members.

Tim and I would be happy to -- even the new folks that are at the NANC now, we'd be happy to bring anybody. This is a public meeting. We're happy to have you. If you would like to join the B&C working group, please feel free to e-mail either Tim or I. Our e-mail addresses appear on page 11.

Our future meetings - we have a meeting coming up on the 21st of July, and by the way, our Tuesday August 18th meeting has been cancelled. We'll meet again in September. Are there any questions?

CHAIRMAN KOUTSKY: Kevin.

MR. GREEN: Kevin Green, Verizon. I noticed that this evaluation only has Met and Not Met where some of the previous ones had Exceed and other categories. Is there a specific reason for that?

MS. EMMER: There is. As the NANC has seen over many, many, many, many years with the NOWG performance evaluations for the NANPA and the PA, they have five or six categories of ratings.

There is a lot more involved in actually rating the NANPA and the PA in

terms of the volume of procedures, the experiences that carriers have with the PA and NANPA by way of having to get telephone numbers from them versus paying into an organization so there were many processes and procedures that the NOWG has that would require more ratings in that there would be more things to rate on sort of in that regard.

And we thought that by way of this being an accounting firm if you will, they're meeting or they're not meeting their requirement. We would certainly be happy to re-look at that. If you or the FCC or if anyone thought perhaps that we should, we would be happy to.

We do have meeting notes that are posted on the NANC website that clearly explains even more than I've just explained why we did that but really just by way of it being an accounting firm we thought that -- it's very hard to determine if you're going from a Met to an Exceeded, there is less to put on "performance survey" than there would be for NANPA and PA so that's why. Does that answer your question?

MR. GREEN: Yes, thank you.

CHAIRMAN KOUTSKY: Any thoughts? Again, I'd like to second the excellent work that was done. I kind of wish my accountants got last year for -- within two percent or whatever that amount was. That was actually really good work. Future of Numbering, Don again. He's moved to this side of the table.

REPORT OF THE FUTURE OF NUMBERING WORKING GROUP (FoN WG)

MR. GRAY: Thank you Mr. Chairman. On behalf of Jim Castagna and Adam Newman for the Future of Numbering Working Group we'd like to share with you what we've been doing since last year.

Some people have often asked on our page two, what is it you do, and what's your mission, and what's your scope so we decided that we would pull that up out of the NANC training binder and provide that for you as a little refresher and we occasionally go back and refresh our own minds about wait a minute, can we do this or not? So there's an outline of that.

And because we've got some big stuff to come yet this afternoon I'm going to try to keep this real short. Slide three is just -- here's what I'm going to tell you about.

Slide four is a summary of our activities. The FoN meets telephonically at all times. We don't have face to face meetings so we've had 22 meetings since February of '08. We've had primarily presentations and discussions on our action item 05 which we'll talk about in a little more detail here in a minute and we've got three or four other items cued up that we'll be working on as they come.

Slide five basically states that in the pending presentations, taking a look at networks and numbering systems, what impact changes to the numbering resources could have on that. That's the general topic. Where will it go we don't know until we start looking into it but one that could have some interesting questions and

answers going on.

Addressing interoperability and ENUM is another one that we have lined up at some point to get into, and then another one which has been of great interest is the mobile numatic society demands and the changing of numbering requirements.

This originally started, and not to pick out a particular company but it's easier for me to say on Onstar an entity where phone numbers were assigned to a device that went into a vehicle that okay, what happens to that vehicle after their three months, six month, one year free services and what happened to the number.

Since then there have been a large number of uses of nomadic type devices, in fact there is a company in Britain that is providing a nomadic device that goes on to animals, even animals down in the (Unintelligible) plains where they want to track them, they put a device on there. It's basically a little (unintelligible), calls up to a satellite every now and then and it says here so they can track movements of animals and things like that. So where does it go, I don't know but something we wanted to look at as to see what might be.

FTN005 is one that was brought to us. It has to do with toll free resources and the question was asked -- currently toll free resources are in a common model. In other words, first come first serve and the rules and regulations are very specific that the numbers will not be sold, bartered, traded or otherwise used as a commodity.

And we were asked to look into the pros and cons of should there be a change to that, to look at what other countries may or may not be doing in that respect, and to come up with an analysis and a recommendation to the NANC when

we were done.

What we have been doing is coming up with an overview of toll free resources. In other words what are they? You know, regulated by the FCC but there are no oversights specifically by states. They're assigned to a subscriber by the Resp Orgs using their own database, in no way associated with the NANPA or PA.

They are non-geographic in nature. They've got some vanity to them in some cases. Subscribers obviously paying for the incoming call and multiple carriers and portable competition are allowed better usage of them.

As we went through this we started identifying that the toll free stakeholders which are both the consumers and the end users, and the industry and public policy all had a piece in what's going on with these numbers so a lot of our efforts have been to solicit input, gather input, and start to develop a white paper.

And what we found basically is that you've the consumers, and I'm on slide 8, for people that dial that toll free number. You have the commerce and the end users, those who are answering that number, and then you have an industry consisting of carriers, service bureaus and vendors who are supporting the consumers and the commerce end users.

Obviously public policy from a government regulatory perspective is involved then as to how these are all used. From a consumer aspect, were involved and associated or made use of easily recognizable codes or ERCs as they refer to them. 1-800 Flowers contacts progressive. Radisson Hotel got theirs. All of the hotel chains have picked up toll free numbers that are sequential, things like that.

There's no call to consumer and most of them, I say most because not all are consumer based. I think there are still some companies out there that are providing, you know, 800 numbers for the kids to call home or if you have a large extended family and you want to do something like that, but I think that's kind of more on the wane than it used to be with the advent of the large bucket of minutes or the all you can eat plan that the wireless carriers are providing these days.

Multi-facet advertising, what we mean by that is the ability to take a number such as 1-800-Flowers and use that same identical phrase as your URL at the website. So there's a lot of connectivity between these numbers which further increase the potential value of it.

As far as consumers or the commerce and the end users go, on slide ten, a lot of innovation out there simply coming up with easily recognizable codes and directing those at specific industries.

The number in itself is advertising. The fact that you get a higher response rate if people can remember it and, obviously, RCs allow you to focus on the message and not the number so you can repeat your message four times during your 30 second TV commercial instead of having to repeat your number to get people to remember to call you.

The surety or the tenure is a concern. It's one of the things that's been identified as we've gone through this and that there is no way for a company to have a 100 percent confidence that the number they've been allocated is not going to be utilized, transferred, taken or somehow usurped by some other entity, and we'll have

more of that in our final report that we present to the NANC.

Equal opportunity but not equal value. Well, what do we mean by that? Since numbers are on a first come first serve basis, if someone gets there and obtains a number simply because all they wanted was a number, and another entity comes along at a later time that that number happened to spell some mnemonics or something that is associated with their product, there's not a legal way for them to get access to that number.

And so yeah, it was first come first serve but the person that had it, it meant nothing to him other than it was a ten digit number compared to the company that could associate a mnemonic with it so there seemed to be perhaps some imbalance in that.

I doubt there's anybody around that uses a telephone anymore that hasn't used a toll free number. Sooner or later in the day they're making use of it.

The industry itself, you have the carriers and the service bureaus on slide 11 that basically provide the interface between the commerce and the end user to obtain a number to associate that number with a specific public switch telephone network number then so that you get the number directed to where it is.

Some of the service bureaus provide enhanced functionality for those toll free numbers and it can range from time of day routing. Let's say that you're some type of a nationwide organization but you want the answering service or the customer service location to follow-up the sun across the United States so that you don't have to have people in New York City trying to respond to calls from the east

coast.

So you've got services like that and you can even get down where they do some sharing of an 800 number where perhaps it's some kind of a mnemonic for a particular industry or an industry segment that when you call that number the service bureau looks to see what the originating telephone number is and then routes it to specific commerce individual that's in that.

Let's say it's a restaurant chain. There's an 800 number for the restaurant chain. Well, if somebody in California is calling that number you certainly don't want to send it to the New York City restaurant that's in that chain. You don't want to send it to the chain that's associated with that geography. So things like that, that are adding value.

Some of the other things the vendors can do are transaction security service securities and then the routing and call centers as I mentioned.

Our action plan for this is to come up with a white paper that lists the real and perceived rights of both the end users and the legacy and new service users, review examples of other property rights. One of them is in Australia where they have gone to a property rights model with their telephone numbers.

Come up with an approach for the pros and cons of each of the models and identify them and then prepare the paper and distribute it to the industry members for input and then we would bring that back to the full NANC to present to the NANC to see if they would like to make a specific recommendation to the FCC or what they'd like to do with it.

We're in the final stages of the white paper --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 2, SIDE B)

* * * * *

(START OF AUDIOTAPE 3, SIDE A)

MR. GRAY: We're now going through and doing the wordsmith, cleaning up the citations to different examples or rules, regs, or whatever, and we're moving forward on that.

Page 13 is the list of activities that we've worked. Five is the one we're currently working. Four is most likely one of the next ones we'll come up with but we're still taking contributions on these others.

And on the last page are our next three scheduled calls. If any of you would like to call in or have folks within your organization, like the rest of the working groups in NANC we're opened for everybody to participate. I think you'll find it's usually a good and stimulating conversation and sometimes you hear things that you hadn't thought about. If there are any questions I'd be glad to answer them.

CHAIRMAN KOUTSKY: Okay, thanks, Don.

MR. ROGERS: Greg Rogers, Level 3. I wonder in your action plan whether you've identified -- you've mentioned toll free porting. With the discussion and the work that's going on with respect to setting intervals and defining simple and complex ports in the PA working group, is that contemplated in a toll free environment as those two things are related, as you said that there's a mapping that

occurs and so when you have porting activity the intervals being synchronized would be something that we think would be important to be contemplating.

MR. GRAY: Well, I think you probably have two different issues going on here. The porting that we're going to talk about is going to be the porting of a geographically associated telephone number from carrier to another. You're still within the same rate center.

The porting that happens with a toll free environment is the total redirection of that toll free number to any other geographic related number. So the two are disconnected and to my knowledge the FCCs one day complex simple porting does not apply to the porting of an 800 number or (unintelligible) if you will of an 800 number to a different POTS number or PSTN number.

MR. ROGERS: But doesn't that inherently create issues or possible service adage problems where the porting of the telephone numbers occurs at a different interval than the associated toll free number such that you might be porting faster for the telephone numbers but the 800 number doesn't port and the use of that number then is not available?

MR. GRAY: I understand your question and I don't have enough knowledge of those two separate issues and how they may connect together to give you a good answer Greg. We can bring it up on our August 6th call because we've got three folks that are directly involved in this and see if that is something that would be a concern for them if we move forward.

That said, my guess is that most of the numbers that toll free resources are

pointed at, most of the PSTN resources, those are not simple ports. They're going to have some augmented services behind them whether there's a PBX behind it, whether there's multiple call forwards going on based on time of day, location.

I'm thinking that those are probably going to be considered complex ports anyway and may not be impacted by the one day port but we'll sure ask that question and see what we can get for answer for you.

MR. ROGERS: Okay and I understand that point. I guess just more broadly perhaps is whether there's ever been or whether it's contemplated that the toll free number and the telephone number be ported at the same interval, whatever that may be and how that would work. And that I think is the issue that we've seen some of more broadly described.

CHAIRMAN KOUTSKY: José.

MR. JIMENEZ: José Jimenez, from Cox. Actually the gentleman from Level 3 raised an interesting issue that I think merits more consideration particularly if the FCC goes forward in the further notice to consider additional porting issues and porting intervals for more complex (unintelligible).

So I mean even if -- I agree with you, most ports today are simple ports and the one day don't (unintelligible) toll free numbers. I think as the FCC continues to cogitate on additional issues it might be an interesting issue to consider in that docket.

But I'm just curious how the working group identifies the issues. They are very interesting to me. People show up on the call and say this is an issue -- is that

what happens?

MR. GRAY: Yes. As I said, anybody can participate in the working group. You come to the working group. We have a couple of different forms that we have on our website which is under the NANC Chair documents which people can use to submit a topic for discussion for consideration and if the group as a whole through consensus accepts it then we put it into the queue to work it.

Some of them we work fairly quickly, others such as this one, a lot of information. It was almost like we had to have an education period first of all which took three or four calls just to get everybody educated as to how do toll free numbers work, where do you get them, how do you get them, who works with them, who can move them around, how do they get moved around?

And once we had some of that framed then we could start addressing the real question that was asked which is does it make sense to move it from a common to a property rights model.

CHAIRMAN KOUTSKY: Rosemary.

MS. EMMER: Rosemary Emmer, Sprint Nextel. I don't have a question about your presentation but you mentioned in the presentation the training binder, the NANC training binder that Beth O'Donnell and I compiled in 2006. September of 2006 was the last revision and I sent that document out three or four times a year.

Somebody asks me three or four times a year for the training binder. We have new folks here. It's on the NANC Chair website if you want to look at it but it

is outdated, 2006 was the last revision, and I wanted to talk about two things with that.

Number one, I have an opportunity now that we have Nicole Dail who is a junior at Virginia Tech as an intern. I have an opportunity to give her the binder to reformat because Beth O'Donnell and I have it in a single format. It could look a lot nicer with no content changes and someone like Nicole Dail could do a fantastic job for us putting it in a nicer format.

So I would very much like to be able to give her that document to reformat and then ultimately to send it out at some point even if it's still got its old version number on it.

But in any even event more than that, just not knowing when we're going to have another NANC meeting in face to face and that sort of thing, I would really like to get an action item going for the co-chairs of the working committees to have a look at the language.

I don't believe this is going to be political or policy related. I think this is just looking at it and making a few updates, and maybe even if our end date or if our deadline was December, it would be fine with me if the deadline is like way far away, it's perfectly okay but if we got something down then we would know going into 2010, we could get the document updated with the new version number. So that was all. Thank you.

CHAIRMAN KOUTSKY: That's actually a good idea. I think it might be something that we would want to pick up with the charter. The NANC should be

obtaining a new charter in October, knock on wood.

Given that they've given us a deadline of the end of October to take an action I would assume that we would be re-chartered in early October, otherwise impossibility, but I think that actually might be a really good opportunity time to do that as well and then we can essentially keep the decks clear because whenever NANC is re-chartered it's pretty much has been a re-chartering but each NANC does have a useful life of a couple years and I think that might be a good opportunity to kind of pick that up.

But yes, certainly if people want to volunteer now to clean up things and highlight things I'd be more than open to that.

MS. EMMER: Okay, so what I'll do then is I'll go ahead and give Nicole Dail the document. I'll have her reformat it and then perhaps the action item by the next NANC meeting, to have the co-chairs and the committee like just look at it and give it to -- do you want me to take it or Beth O'Donnell to take or do you want to appoint someone else to actually do the changes?

CHAIRMAN KOUTSKY: Well, if you're volunteering.

(LAUGHTER)

If you're volunteering or Beth's volunteering that would be great. And certainly just make sure that people are kept in the loop in terms of -- obviously I'm hesitant to go about and change the charges of each working group but I do think the time to do that might be October.

It would be really kind of a useful time to say

okay -- instead of using the next NANC I would actually use the next charter date as being something that, you know, here's what we think for the next period of the NANC, our charge has looked like this and we would actually like to revise it to look -- delete X and add Y, that type of thing and then we would review that the next opportunity we have.

MS. EMMER: Thank you. So Beth and I will do probing as co-chairs. Thank you very much.

CHARIMAN KOUTSKY: Okay, thank you. Anything else? This is Exhibit 13. Lucky 13. Thanks a lot, Don.

MR. GRAY: Thank you.

CHAIRMAN KOUTSKY: Okay, now let's move on to -- oh yeah, we have the LNP stuff. The LNPA working group, and I don't know if this is going to be Gary or Gary and Paula. We don't need to remind you how much these guys have been working but they literally did fly into the country yesterday so let's give them credit for that.

Scheduling this meeting was like threading a needle because we have state commissioners flying out tomorrow. One of the purposes of this meeting and the presentation that I've asked Gary, and he'll give the standard report too but it's to also go over -- essentially give the NANC a full status of the implementation progress that's been done by the working group on the shortened porting interval order.

They've busted up into sub-teams and the goal here really is to in essence to

get all the issues out on the table.

I don't really want anybody in the industry and the public to be caught unawares about issues of contention that might have arisen in terms of the one day porting interval exercise.

And so the idea here is not necessarily to resolve any of these questions but it is to provide some initial feedback to educate the NANC as to bones of contention or issues that may either be contentious or that have not been contentious to essentially provide informational purpose so that when we come in in late September or early October to make the final changes that the FCC has asked us to make, we're doing so with the basis of some knowledge that we actually are not presented with a thorny issue one week before that important meeting.

The idea here is really to get all the laundry aired. So I actually hope, encourage, and expect everybody to participate and to let their views or thoughts be known. So I'll just turn it over to Gary and I'll sit back and listen.

REPORT OF THE LOCAL NUMBER PORTABILITY (LNPA) WORKING GROUP

MR. SACRA: Thank you, Mr. Chairman. Good afternoon everybody. I'll apologize in advance for what I believe is the thickest report that the working group has ever submitted to the NANC but it's been said several times today, there's a lot of stuff going on in the industry and I believe it's important that we have an opportunity to review it and discuss it.

For those that don't know me, my name is Gary Sacra. I'm with Verizon but

I'm here today as one of the co-chairs of the LNPA working group along with our other co-chair Paula Jordan from T-Mobile.

So I guess in our defense with the thick report here we did cover two agenda items in this one report so that is one of the reasons it's quite voluminous but I'll try to get us through it as quickly as possible but please feel free to ask me any questions at any time. Stop me at any time if you have any questions.

As Chairman Koutsky said, it's broken down into two portions so I'll go through the first portion first which I guess is the general LNPA working group report just to give you a status on some of the issues that we've been working on, that we've addressed since the last meeting, and then we'll move into the other portion of the report which is the implementation plan that the working group is currently developing for implementation of FCC order 941.

So the first item on the report on page one is the examples of issues addressed by the LNPA again and these are just examples of issues that they've addressed since the last NANC meeting.

Mel Clay, co-chair of the NAPM LLC touched on this first item. It was an emergency change order the latter part of last year that the LNPA working group developed. It became SOW, statement of work 69, but it addressed a database capacity concern among a number of service providers that resulted by some service providers that were breaking up Thousands Blocks into individual database records in order to populate certain data fields.

What NANC change order 436 allowed was -- it synched up the data fields,

the data perimeters between the individual database record and the Thousands Block pooling record so that providers didn't have to break up the blocks into a Thousand individual records for the purpose of populating those fields.

Since the implementation of NANC 436 the latter part of last year, we've experienced a reduction in the millions of database records because now providers were able to collapse those individual records back into single Thousand Block pool records because of those additional database perimeters that were made available in the pool block record.

So that was a significant change order and it was done quite quickly and our thanks too to the NAPM LLC who also acted very quickly in getting that statement of work through.

The next item, 1051 or statement of work 66, this was another item that Mr. Clay touched on. This addresses the cleaning of NXX codes in the NPAC that have been opened up by the wrong service provider and when that happens, when a provider inadvertently opens up an NXX code that they're not the code holder of in the NPAC, that results in issues with the ability for providers to concur on ports.

So we implemented a statement of work 66 which resulted in a PIM that was brought to the working group to clean up those NXX codes.

NeuStar has gone through that process I believe to completion and I believe it was over 8300 NXX codes that were identified as having been opened up by the wrong service provider and this is across all seven NPACs in the U.S., but 8300 codes had to be cleaned up and associated with the appropriate service provider.

And there is a permanent solution that hasn't been implemented yet but it is a change order that is under consideration that would create an automated means of insuring that the appropriate service provider is opening up an NXX code in NPAC.

We've also implemented a number of best practices since the last NANC meeting. Best practice 54 addresses scenarios where some carriers were requiring that an end user had to be their customer for at least 30 days before they would allow that customer to port out to another provider if the end user chose to port within that 30 day period.

We created a best practice that basically says that the length of time that a customer has service with a provider should not dictate if they are able to port out from that provider once they choose to do so.

Best practice 55 addressed revisions to the NANC LNP (unintelligible) to address FCC order 07188. If you recall that's the order with the four end user validation fields and the interconnected VoIP border.

Best practice 56 addressing instances where new reported wireless customers were unable to receive their text messages because the old service provider, the old wireless provider had not removed data from their databases.

Best practice 57, service providers encountering LSMS capacity issues due to pool blocks being broken down in individual ported records. That's related to the NANC change order 436 but we did develop a best practice for that scenario and it's the position of the working group that service providers should limit to the extent possible the breaking of pool Thousand Blocks in individual SV records for projects

that they're working on in their network.

Best practice 58 where we addressed the distinction between an inadvertent port and a disputed port. We defined a disputed port in the best practice as a port that occurs when a new service provider is approached by an end user, an authorized end user to port the number.

They issue the LSR to the old service provider. They get the confirmation from the old provider. The port is activated but then another authorized end user for that account then approaches the old service provider and says that they did not give permission to port that number.

So in addition to defining what a disputed port is and making the distinction between that and an inadvertent port, disputed ports are to be addressed on a case by case basis by both the individual parties involved as well as the old and new service provider in order to address that issue.

Best practice 59 addresses the population of certain database records that are labeled for future use. They're optional data perimeters as well as data fields. It's the position of the working group that service providers should not create a new database record or pool block records solely for the purpose of populating any of those fields or optional data perimeters. And again that's related to the NANC change order 436 as well.

We also worked on the next NPAC software release 3.4. That release right now contains 19 change orders and the release 3.4 package that's been recommended to the NAPM LLC.

Included in that package is the increase in (unintelligible) requirements for both the SOW interface and the LSMS interface to address anticipated volume increases in porting and also there's another change order in there too that provides some automation for SPID migration process.

The SPID process is a process that was implemented in an earlier software release. Sometimes due to mergers and acquisitions if the service provider ID that's associated with an NXX code and the NPAC has to change because of a merger and acquisition, prior to doing that one of the methods of changing that NXX code SPID association was to delete the code in the NPAC and then add it back in under the correct SPID, but if there's active ported records in that code in order to delete the code you had to temporarily delete the SV records which is a temporary service affecting condition for the ported customer.

So with the SPID migration process we can now migrate an NXX code from one SPID to another without interrupting the end user service and what this change order and release 3.4 does is add some more automation to that process because it is a fairly labor intensive process.

And currently the release of the 3.4 package is under review by the NAPM LLC. It's been recommended by the working group and I believe the recommendation letter was sent to the LLC in February and it's currently under review with the statement of work that NeuStar submitted to the LLC is under review.

Any questions so far?

Okay, the next item is NANC 437. That's a change order that was brought in to the working group by Telcordia. It was back in January of 2009. They brought the change order to the working group and requested that a technical feasibility analysis be performed on the change order. That analysis is currently underway by the working group architectural planning team.

NANC 437, the proposal is for a multi vendor peered NPAC architecture, meaning that there would be two or more NPACs in a particular region serving as peers of each other. Service providers would choose which NPAC vendor, NPAC platform that they wish to connect to.

The current architecture, as I'm sure you're aware we have several NPAC regions in the U.S. and there is a single NPAC platform in each region.

Telcordia has been identifying proposed changes to the NPAC and interface specifications as the technical feasibility analysis continues in the working group.

We've gone through the functional requirements, specifications, we've gone through the process flows, and we've documenting along the way in what we call a parking lot document, operational issues, questions, documentation items that have to be cleaned up, architecture questions, issues.

Those are all being documented in this parking lot and we're now in the process of circling back and going through those items to make sure that we fully address each item or at least check off the items that perhaps are documentation issues, but just make sure that we touch on them to make sure that there is no impact to a technical feasibility determination.

And the architecture planning team, we are conducting interim virtual meetings between the every other month face to face meetings and during the face to face meetings every other month we've been devoting at least one day to the continuation of the 437 technical feasibility analysis.

Questions?

CHAIRMAN KOUTSKY: José does.

MR. SACRA: Oh, I'm sorry, yes.

MR. JIMENEZ: Yes, I have another question. José Jimenez from Cox. Back to page one BP58, I have two questions for you regarding that item. First, you explain here how you would resolve a dispute of port but what would be the solution to an inadvertent port?

MR. SACRA: We do have a process in place. It's documented up on our website. It's called something like inadvertent port process. Typically the first step is the old provider tries to contact the new provider where the number was ported and work with them to get the number ported back and get the customer back in service.

If they attempt to contact the new provider and they fail to reach the new provider in order to work with them then there is a process where the old provider can contact NeuStar, the NPAC administrator and NeuStar will attempt to contact the new provider to get the number ported back to the other provider.

And if NeuStar cannot contact that new provider then I believe after verification that the old provider truly is authorized or has a need to port that number

back, NeuStar will get the number ported back to the other provider or concur on behalf of the new provider that the old provider needs the number ported back.

MR. JIMENEZ: Thank you. And then regarding the disputed port, it says here that the solution would be arrived at on a case by case basis. What is the relationship between that solution and the anti-slamming regulations of the FCC?

MR. SACRA: Well, I guess there's a distinction with disputed port because - and I'll give, perhaps it could be a real life example, but say if there's a couple that either divorced or were estranged but they're both authorized users of that account and say if one of the authorized users approaches a new service provider and says they want to port the number and they sign an LOA, letter of authorization with that new provider, then that new provider is authorized to submit an LSR to the old provider and the number is ported.

And then after the fact the other authorized user on that account I guess disputes that they authorized or that the port was authorized, so now you have two authorized end users on that account disputing whether the number should be ported and so I guess in that particular case there was no slamming, no provider did anything untoward because they had authorization from an authorized user to port the number. So it's really not a slam in that particular case.

MR. JIMENEZ: I agree with that but then how do you resolve that?

MR. SACRA: Well, in this particular best practice there's not a step by step flow of how it gets resolved. The purpose of the best practice was just to make a distinction between the disputed port and an inadvertent port because there is a

process for getting an inadvertent port to the customer ported back and there was concern that that would be confused or that process would be used in confusion on a disputed port. And really a disputed port is an entirely different situation and really the inadvertent port process doesn't apply.

MR. JIMENEZ: Okay, so you're not suggesting that the LOA would be insufficient in any way?

MR. SACRA: No, no, not at all.

MR. JIMENEZ: Okay, thank you.

MR. SACRA: Okay, any other questions?

The PIM report, I won't go through this item by item. For those that may be new and not familiar with our PIM process, PIM stands for problem identification and management. It's one of the means that working group participants bring in issues to the working group to be addressed.

You know, once the working group hears the contribution from the submitter, there's a determination based on consensus whether to accept the PIM. Once it's accepted then we work it. Typically we have a standard PIM form. There's a suggested resolution by the submitter and we work through that PIM.

A number of the PIMs that have been addressed since the last NANC meeting actually were addressed by the best practices that I just spoke through. But a number of the PIMs are kind of in a tracking state. We have a couple that are tracking the recent FCC order for the one business day porting interval for simple ports. Some are tracking change orders that are included in the current recommended 3.4 release

package.

So the most part, the open PIMs are now in a tracking state but we'll continue to track them until whatever it is that we're awaiting occurs, either the change order is implemented in the next NPAC release or implementation of 0941 occurs and then a lot of these tracking will actually be closed.

If there are no other questions on the regular report, then I can go into the --

CHAIRMAN KOUTSKY: It may be best to take this up section by section or something like that so we can have discussion on particular issues rather than just go through it and then start all over again.

MR. SACRA: Okay. I guess before I jump into the report I'd first like to recognize and personally thank my co-chair Paula Jordan from T-Mobile and the five chairs of the sub-teams that I will discuss in a minute that were formed. That's Jan Doell, Quest, Nancy Sanders of Comcast, Linda Peterman, from One Communications, Teresa Patton from AT&T Mobility, and Deb Tucker from Verizon Wireless, and the dozens of working group participants on both the sub-teams and the full working group that have been working tirelessly to progress the implementation plan forward.

I can honestly say without the efforts of all these people that we would not have made the progress that we've made today and I hope it's evident to you after I get through the report.

As we all know, FCC order 0941 was released on May 13th of this year. It mandates a one business day interval for wireline to wireline and intermodal simple

ports. And just to quote the order, the FCC directed the NANC to develop new LNP provisioning process flows that take into account this shortened porting interval.

In developing these flows the NANC must address how a business day should be construed for purposes of the porting interval and generally how the porting time should be measured. The NANC must submit these flows to the Commission no later than 90 days after the effective date of this order.

It has been published in the Federal Register I believe right before the 4th of July holiday and that started I believe a 30 day clock, and then after the 30 day clock expires that starts the 90 day implementation clock. So I believe, and Chairman Koutsky correct me if I'm wrong, I believe the NANC's deadline is October 29th.

CHAIRMAN KOUTSKY: That's how I count it.

MR. SACRA: So during our May face to face meeting the working group developed a work plan that we submitted to the NANC on May 18th. The work plan identified and prioritized items that we felt needed to be addressed or should be considered by the working group in support of the implementation of the order.

So we broke down the items after we had a brainstorming session, a white board session, we broke down the items into higher, medium, and lower priority items not to imply that even the lower priority items we didn't feel were perhaps necessary but we just broke them down into things that we felt like we needed to tackle perhaps in a certain order.

The first higher priority item was obviously changes to the porting flows and the narrative in support of the one business day interval. I'll get into that a little bit

more as I get through this particular work plan item.

We needed to define a business day consistent with the order, how to measure the porting time, what do we consider the start and stop time of the business day, the local service request cutoff time for when -- the cutoff for when up to that time when the port could be activated by a new provider on the very next business day, and when the new service provider can activate the port.

And then we also needed to address the phone order confirmation timeframe, whether or not the FOC is considered part of the one day interval and what is that FOC interval, when does the old provider have to return the FOC to the new provider.

The working group was very interested in the work that was taking place and continues to take place in the ATIS OBF. A lot of good work is taking place there in standardizing the data fields on the local service request so we did send a liaison to the ATIS order and billing form requesting a list of the standard LSR data fields.

We did request by July 15th -- we understand this is related to the further notice of proposed rule making but we thought if there was an opportunity to include it in our implementation plan that we will be submitting to the NANC we thought that that would be good and appropriate.

CHAIRMAN KOUTSKY: And I would just point out that we do have a representative of ATIS OBF here, Sharon Weldon, who has agreed to give a presentation on that so I think if there is an appropriate time, that would be great.

MR. SACRA: Okay. We also felt a need to explore the pros and cons and

service provider and NPAC impacts on the various process options.

You know, we have the current LSR OC process. In the wireless world there is the WICIS, the wireless interface standard and we also thought that there be an opportunity to explore some of what we call out of box solutions that are non LSR and non WICIS related. You know, is there any other possible solution out there that would make sense to implement now that we have the 0949 to implement.

So in either case, in either of these three cases though work on the standardization of the data fields we thought should still and would still continue for any solution that we may arrive at in terms of the inter carrier process.

And we also thought there might be an opportunity to review the definition of a simple port and non-simple port for any possible recommendation for inclusion in our implementation package to the NANC and I will get into that a little bit more when we get into the sub-teams.

The meeting and priority items we identified, again standardization of the LSR data fields. Again the administrative and provisioning data fields, understanding this is related to the FNPRM but we thought there could be an opportunity to get this included in the work package.

Changes or standardization to the form itself, not just the data fields but the actual form itself, and the discussion of establishing a possible customer service record interval. Today the customer service record interval is a pre-port process. There is no standard for an interval time to return a CSR when requested by the other new service provider so that is a discussion that we are going to have as well in the

working group and finish off the work plan that we submitted, the lower priority items. There's a potential for an NPAC change order to support the one business day interval specifically in the area of the timers that run what's called T1 and T2 timers and an indicator for which set of timers to use if the industry moves to create an additional set of timers in support of the one business day porting interval.

The T1, T2 timers, as an example the service provider when they send up their create message to the NPAC that starts a T1 timer in the NPAC. If the old provider sends up their concurrence then the timers stop and the port can be activated on the due date but if the old provider, and it's the old provider concurrence that creates messages, an optional message, an older provider is not required to send it up so in that case the new provider is still going to have a need to activate the port on the due date.

So there is an expiration of this T1, T2 timers. Once they expire then the control of the port then resumes back to the new provider so they can still activate it on the due date even though the old provider never sent up their optional concurrence message.

So the T1, T2 timers have I guess kind of dual role. One, it allows the old provider to make sure that they've done the things that they need to do in order to keep the customer in service when the port is activated and it also then allows the port control to shift over to the new provider once they expire if the old provider never sends their concurrence message up to stop the timers.

So the current timers for the current four business day interval are each nine

business hours and obviously on a one business day porting interval those timers are too long so there is some discussion going on that perhaps we can just reduce the current timers to a shorter timer to support the one business day.

There's also a school of thought that we still need the nine business hours for the current four business day interval which will still remain in effect for non-simple ports so there is another school of thought perhaps to add an additional set of timers to support the one business day. So this is a discussion that's still ongoing and we haven't come to any conclusion yet.

Currently there's a minimum five business day restriction on the first time a number is ported in a NXX code meaning that the port can't be activate or the due date -- the port can't be activated until five business days after the impending port is created.

This was meant to allow those providers that actually react to the first port notification that the NPAC sends out in order to set the triggers and their switches. Some smaller providers don't set the triggers up front. They just -- on the portable NXX codes they just wait until the first time a number is ported in the code and then they react because they don't have that many switches to set the triggers in.

So that was the purpose of this five day restriction when the first time a number is ported in an NXX code, so we are reviewing whether or not we want to sustain that restriction or eliminate it with the one day business port interval.

And finally related to the FNPRM, we're looking for any other efficiency improvements that we may want to include as recommendations in the

implementation plan.

Okay, any questions on the work plan that we submitted?

MR. JIMENEZ Me again, José Jimenez from Cox. I was curious as to why there were some higher priority items that seemed related to the further notice. Considering that we have already heard today how the challenge of meeting the timelines the FCC set, why is it that there are higher priority items or medium priority items that are related to the further notice while there are items in the lower priority that seem to be related to the current program?

MR. SACRA: It's a good question, and first I'll preface this with we are remaining cognizant of what we're actually charged with and what would be still I think important to include if we can accomplish it but we are remaining very cognizant of what it is we have to do for compliance to the order so we're not letting anything I guess get ahead of that.

The other thing too is that some of the higher priority items that may be related to the FNPRM, the reason that we placed them there is because if there are changes made as a result of the FNPRM after we implement 0941, they are items that will have a significant impact on what we have put in place in order to comply with 0941.

So we felt it was important to move some of those things up at least in the higher priority to see if we could get those accomplished because if we had to come back after the fact, if something has changed as a result of the FNPRM then we may have to go back and undo some of the things that we've done for compliance to

0941.

So we kind of picked items that we thought would have a significant impact on things that we're doing for 0941 and move those up to try to put some focus on those to see if we could get those accomplished.

MR. JIMENEZ: Thank you for that. Then could you explain why there are some items that I think you explained might be related to the current order that are lower priority?

MR. SACRA: Well, the first one, the timers, one of the reasons is because we felt that if we do make a decision to add an additional set of timers we thought that was very doable and after some I guess consultation with our NPAC vendor and our local system vendors, we felt that that was very doable in the timeframe, the nine month implementation timeframe.

So really it's a matter of -- to decide whether we're going to do it and if we do decide we do feel we'll have plenty of time to get that accomplish in terms of development.

And the other reason is, we do have a fallback, that we have an exiting set of timers out there that the values are tunable meaning we can go in and change them from the nine business hours to anything down to zero so we felt that there was not so much of time crunch or a development crunch on that item.

The five business day restriction that can remain in effect and have no impact at all on the compliance to the order, that's just something that we just thought we might want to touch base with now that we're kind of reviewing some of the flows

for the order.

And the last item is again just other not yet identified efficiency improvements but just we have kind of place holder there to see if we can identify anything we may want to include.

MR. JIMENEZ: Thank you.

MR. SACRA: Next, and I've already alluded to it at the May 2009 meeting, because this is a significant work effort and we felt that we needed to kind of break the work steps down or the work effort down into a number of sub-teams so we developed five sub-teams, the defined one business day sub-team chaired by Jan Doyle of Quest, the simple port definition sub-team, Nancy Sanders of Comcast is chairing that, the LSR sub-team is chaired by Linda Peterman of One Communications, and the WICIS sub-team chaired by Deb Tucker, Verizon Wireless, and the Out of the Box sub-team chaired by Teresa Patton, AT&T Mobility.

So these sub-teams have been meeting at least on a weekly basis, sometimes twice, three times a week by conference calls.

Any recommendations or consensus positions that they develop based on the issues and the questions that they are attempting to address, they are being brought to the full LNPA working group for discussion and prior to being placed into the recommendation implementation plan that we'll be submitting to the NANC. And we'll be getting into each of the sub-teams and just providing you some background material and addressing some of the issues that they're working. Okay, any

questions there?

Okay, the status of the NANC LNP provisioning flows and the revisions to those in support of the one business day interval, again as I said earlier we are addressing the flows and the narrative revisions in the full LNPA working group. It's not a sub-team. So we are doing those as well on interim conference calls, as well as working on them in the full face to face LNPA meetings.

What we did first was continue to work on revisions to the flow diagrams themselves. For those familiar with the flows, they are more of a high level. They are actual flow diagrams of each of the steps, not only some of the inter-carrier communication back and forth prior to the port taking place but also and more significantly the process of how service providers interact with the NPAC.

So we thought it best to tackle the high level flows first and then once we got those agreed upon then we can move to the more detailed narratives where most of the porting details are but at least we would have the high level flows to follow as we revised the narratives.

So we are developing a new flow diagram for simple ports and that's going to be incorporated in the flows. We are nearing completion of the flow revisions. We do have a draft set of revisions to the narratives. We are going to be reviewing those in our face to face meeting on July 27th and 28th.

The flow for the non-simple ports as I said earlier, that will remain so we'll have a separate for simple port and the non-simple port, and the wireless to wireless flows, we're not changing those.

The ICP process inter-carrier communication process is not being changed as a result of 0941 so we didn't see a need to change the process flows for the wireless to wireless port.

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 3, SIDE A)

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(START OF AUDIOTAPE 3, SIDE B)

MR. SACRA: Again, we are starting to review the narratives. Some of the open questions and parking items that are related to the flows that we've identified to date and we're not necessarily asking to have those answered today but certainly any feedback that the NANC members would like to provide would certainly be welcome.

But I've listed the questions here. I'll just run through a lot of them real quick. Are we going to remove the reference to the simple port service request, the SPSR that's currently in the flows?

If you recall, as a result of FCC order 07188 and we changed the flows and the ATIS OBF did develop a simple port request form and submitted that I believe to the FCC.

Some providers I believe have implemented the SPSR, a number of providers have not so we're determining whether or not we're going to eliminate the current work going on in the OBF with developing, and I don't want to steal anyone's thunder but with the current work on standardizing data fields there is a question on

the table now as to whether or not we want to remove the reference to the SPSR and the flows.

Again the timer question, do we want to maintain two timers or move to a single timer, two timer intervals or a single timer interval. It was stated that we need to make clear in the narratives that the old service provider cannot require a customer service request to be requested before they will accept an LSR from the new provider.

We have heard some cases where some providers are requiring the new provider to request a CSR before they will accept an LSR and the CSR is an optional step in the flows. Only in the wireless world -- there are no customer service requests in the wireless world so it's irrelevant in the wireless world.

We also need to clarify in the narratives or it was suggested that there is no need to require wireless providers to use the ten digit trigger because they already are dipping on every call based on their switch architecture.

The ten digit trigger is a transitional mechanism that insures that the ported customer can receive all their calls between the time when the port is activated to the time that the old provider removes their translations in the donor's switch.

The ten digit trigger forces a query to the database so that the proper routing information can be obtained. The ten digit trigger really has no relevance in the wireless world because as a matter of architecture they dip on every call anyway but that's not true in the wireline world unless there's a ten digit trigger set on the number.

It was also suggested we need to clarify in the narratives that the old provider must deploy the ten digit trigger if it's technically feasible. If not then they must monitor the NPAC for activation in order to trigger the immediate disconnect of the end users translation so that the end user after they port can receive all their calls.

And then there's a question that we're going to circle back and answer, is do we want to make this a requirement for just simple ports or do we also want to require the ten digit trigger technically feasible for non-simple ports as well.

There are some steps in the flow currently that address the LSR (unintelligible) exchange between the network provider and a reseller or an interconnect VoIP provider and we've determined that we are going to keep those conditional steps in the flows but we also want to make it explicit in the narratives that the old local service provider must be notified of the port out in order to stop billing so that the customer is not doubled billed but also make it explicit that any conditional LSR FOC exchange between the network provider and one of their resellers or interconnected VoIP providers must not slow down the port, and that's not only true for the simple port case, the one business day but also the non-simple cases as well.

We also want to make it explicit in the narratives that the old service provider is not precluded from exceeding the minimum requirements by being more permissive in their porting process.

As an example, the current four business day standard for what's now non-simple ports, if a provider wanted to support a three day porting interval we want to

make it explicit in the flows that just because the simple port is one business day and perhaps the non-simple is four business days, we're not going to preclude a provider from being more permissive in porting in less time.

Also in the case of non-simple -- the current definition of a simple port says a single line which we are currently interpreting as a single telephone number as well. We have a question of whether or not -- you know, if a simple port is maintained as a single line, single TN, then do we want to place in the narratives then the range of TNs for a non-simple port, two through whatever.

There are what we call service providers call projects, and most service providers that I'm aware of after a certain threshold is exceeded for the number of TNs on a port request that moves into what's called I guess the project area that is not necessarily applicable to a four business day non-simple port interval because -- and each provider has different thresholds but once that threshold is achieved the port becomes so complicated that at times it take more than the current standard four business day interval to port.

So each provider has different thresholds. The thresholds are published on their public website and so we have a question that we're circling around, not only do we want to set the range for what a non-simple port is, two through whatever, but we also want to set the threshold for then what becomes a project.

And on page seven, we also have a question whether or not we want to put detail in the narratives that the data for the four allowable end user validation fields that were mandated in 07188, any of those fields that were required by the old

service provider on an incoming LSR we have a question as to whether or not we want to require or place in the narratives that they need to be on the customer service record if they're in the wireline world.

There are concerns expressed regarding privacy issues because one of the allowable four end user validations fields is the end user pass code so we do have a place holder for a concern there that was raised about requiring an end user pass code to be on a customer service request that any service provider could request a customer service record.

We also want to determine if we'll state in the narratives that end user pass code validation field only applies to end user assigned pass codes and it does not apply to service provider assigned pass codes.

And I guess just to make the distinction, there are providers in fact we had some recent discussions on this in the working group, there are providers that perhaps will assign a pass code to all of their end user accounts not at the request of the end user but as a matter of practice, assign a pass code to all the accounts and in some cases then you place an insert in the customers bill to let them know that there is a pass code on there.

But some providers now we're hearing that they'll submit an LSR to the old provider and it's getting rejected because the new provider hasn't placed the passcode on the LSR and in some cases the end user doesn't know what their passcode is so we're working that as a separate issue in the working group, but in conjunction with that there's a question as to whether or not we want to make it

explicit in the narrative that the end user validation filed called passcode that was in 07188 is actually the end user assigned pass code and not a service provider assigned pass code. And again that issue was raised in the one business day sub-team and that's where we're working that issue.

Okay, questions on the flows, and just so you know, we talked it over in the working group yesterday. Didn't think the flows are quite in a position yet to bring them to the NANC and have you start to review them. We still have some work on them.

We've made a tremendous amount of progress. We're continuing. I'm fully confident we'll have the flows done and buttoned up as well as the narratives well before the time that we have to get the package to the NANC but they're just not in a state yet where it would make a lot of sense to walk through them right now.

Questions?

All right, again, to the five sub-teams, the first one is to define one business day sub-team. As I said earlier it's chaired by Jan Doell. The goal of the sub-team is to address how a business day should be construed for purposes of a simple port interval, basically right out of the FCC order, how that porting time should be measured, what are the start and stop times of the business day, what is a business day, is it Monday through Friday, and the sub-team has also been addressing the firm order confirmation interval.

Again, for those who may not be aware, the current timeframe that the old provider has to submit the firm order confirmation to the new provider is currently

24 hours, 24 clock hours for the current four business day porting interval and obviously that needs to be shortened for a one business day interval and that's an issue that's being worked in the one business day sub-team, or they have reached consensus on that and I'll get to that in a second.

I'm not going to read through here but you can see that this sub-team has a very representative cross section of the industry both large and small carriers, wireline, wireless carriers, service providers, vendors, consultants, regulators, associations that are representing large numbers of service providers. So that is the list of the regular participants that have been working on the one business day sub-team calls.

On page eight, to start the one business day sub-team identified major issues and questions that needed to be submitted by the sub-team. Contributions were solicited from the service provider participants. Each provider that chose to submit a contribution on these questions had an opportunity on one of the calls to walk through their response to the questions and then at the end of their presentation there was an opportunity for other participants to ask clarifying questions.

We didn't really debate the positions of each service provider. We knew that that was going to come later as we tried to reach consensus on some of the issues but there was an opportunity for anyone to ask clarifying questions.

The initial questions were what does your company consider to be a one business day, is it Monday through Friday, is it Monday through Saturday, is it seven days a week, et cetera.

We also asked contributors to address if your company thinks the FOC interval is included in the one business day interval and if so is there a proposal for what that interval should be.

Also what are the stop and start times that should define the business day to set the perimeters around the business day. And we also asked contributors to list examples of different times during the day when an LSR would be received by their center. You know, what do they consider the cutoff time to be. At what point in the day does an LSR have to be received before they can insure that the port would be eligible for activation on the next business day.

We also asked any providers that chose to, to talk whether or not the company thinks that the mandate for simple ports was for porting in and porting out or just porting out. And then any other critical issues that they wanted to bring to the table we gave them an opportunity to list.

So the contributions were presented by each company. As I said we discussed those. Then any issues that were raised during the discussion we compiled on an issues list which I'll go through in a second but five scenarios kind of floated to the top that the sub-team felt was representative of the majority of the participants that provided contributions.

And the five options were Option A and that is that the cutoff time or the business day is the defined as, and I'll do the time zones and things of that nature in a second but the business day is defined as 8:00 a.m. to 5:00 p.m. and the cutoff time to receive a valid LSR and still insure that the port was eligible for activation by the

new provider on the next business day was 1:00 p.m. and that meant that the port would be ready for activation at 12:01 the next business day.

So as an example, if a LSR came in at 10:00 a.m. on Monday, the FOC, and the FOC interval by the way for Option A is four hours, so if an LSR came in at 10:00 a.m. on Monday, the old provider would have to send the firm order confirmation back by 2:00 p.m. on Monday and then the port would be eligible for activation 12:01 a.m. that night or if you will, the following morning but actually that night.

So in that case it's a four hour maximum for the FOC and the business hour is defined as 8:00 a.m. to 5:00 p.m. but also the cutoff our time for Option A is 1:00 p.m. in the afternoon and then an LSR received after 1:00 p.m. would be considered to be received -- again if it came in at 2 p.m. on Monday, it would be considered to be received then on Tuesday the following business day.

Option B, similar to Option A, 8:00 a.m. to 5:00 p.m. is the defined business day but in this case the LSR cutoff time is 2:00 p.m. in the afternoon, still eligible for activation at 12:01 a.m. that night.

Option C, again similar but this time that option calls for cutoff time of 3:00 p.m. in the afternoon. In that case then the maximum FOC interval is two hours because if the old provider got an LSR in at 3:00 p.m., since the business day is 5:00 p.m. they would have to have that FOC back in two hours by 5:00 p.m.

CHAIRMAN KOUTSKY: I've got a quick question on the FOC. So I guess on either of those options if the LSR is received after the cutoff time is the

FOC interval still four hours plus that?

MR. SACRA: Yes.

CHAIRMAN KOUTSKY: So it would happen that same calendar day?

MR. SACRA: Excellent question. As an example, and this is a question that is still an open question but there are two options here. Say if the FOC came in at 4:00 p.m. in the afternoon, because the business day is defined as ending at 5:00 p.m. there's two options.

One is that because you still have an hour left in the business day, the FOC clock runs for an hour on Monday and then starts up again at 8:00 a.m. the following day and runs for three hours on Tuesday meaning that the FOC had to be back at 11:00 a.m. the following morning.

The other option is that if it comes in after the cutoff time, let's say it comes in at 4:00 p.m. on Monday, then the clock starts again at 8:00 a.m. on the next business day so it runs for a maximum of four hours the next business day which means it would have to be back no later than noon. Does that answer your question?

CHAIRMAN KOUTSKY: Yeah, in a different way than I thought but that's okay.

MR. SACRA: Is there a third option.

CHAIRMAN KOUTSKY: Well, the third option would be four hours so if it's received at three o'clock it would come back at seven o'clock.

MR. SACRA: I mean I failed to say this maybe in my opening statement but it's still true now, you know, in working all through this I want to assure we are

maintaining the -- our primary focus is the consumer and their ability to port in a timely manner and also without any disruption of service at all but also balancing the needs of service providers both small and large who are porting in and porting out and also responsible for maintaining that customer service if the port takes place.

So we had to work through that balance, but small rural carriers for example, their business day literally ends at 5:00 p.m. so we had to consider that too.

You know, at one point in time we were talking about possibly the FOC interval running up to 7:00 a.m. to 8:00 p.m. in the evening but again we had to balance that with the needs of a large contingent of providers who don't work that late in the evening.

CHAIRMAN KOUTSKY: So basically the two options, one is that it's essentially told another one that it essentially restarts the following morning.

MR. SACRA: Exactly.

CHAIRMAN KOUTSKY: Anna.

MS. MILLER: Anna Miller of T-Mobile. And Gary I just need a little more clarification. So you're differentiating between receiving a valid LSR and receiving a FOC. I guess that's your example. So if T-Mobile received a valid LSR or if Verizon received a valid LSR by 1:30 p.m. then you would have four hours, a maximum of four hours to send the FOC?

MR. SACRA: Right, with Option A it's always a maximum of four hours.

MS. MILLER: Yeah, I'm talking about Option A which I think you said this is the consensus of the sub-team.

MR. SACRA: Right, it's always a maximum of four hours with Option A.

MS. MILLER: Okay, so if it's received at 1:30 p.m. then you should receive the FOC by 4:30 p.m. is that right?

MR. SACRA: If the cutoff time --

MS. MILLER: I mean if it's 1:30 p.m. you receive the FOC by 4:30 p.m.?

MR. SACRA: No, with Option A it's a four hour maximum so the cutoff time is 1:00 p.m., so if it comes in at 1:00 p.m. then the FOC would be returned by 5:00 p.m. It would have to be returned by 5:00 p.m. that same day. If it comes in --

MS. MILLER: Oh, I'm sorry, that's only three hours, yes. Okay, in your example it's a maximum so if the LSR came in after 1:00 p.m. but you received the FOC by 5:00 --

MR. SACRA: Right, and that's a very possible -- in fact for automated providers you're probably going to get the vast majority of FOC's back --

MS. MILLER: That's the maximum so it could be sooner. So if you received the FOC by 5:00 p.m. does it still forward at 12:01?

MR. SACRA: Yes.

MS. MILLER: Okay, I see. Thank you.

CHAIRMAN KOUTSKY: That's a good question. You have another one?

MS. MILLER: Yes, to keep my mind straight. So if the FOC is not received by 5:00 p.m. then it's a new day kind of thing, right?

MR. SACRA: Well, let me clarify because I may have gotten confused on your scenario. The cut off time is 1:00 p.m. so a provider could consider -- if the

LSR came in at 1:30 they could consider that to be received the following day because it's past the LSR cutoff time.

MS. MILLER: In which case you would hopefully receive the FOC by 5:00 p.m. and it would port by 12:01 the next day.

MR. SACRA: Right.

MS. MILLER: Okay, thank you.

MR. SACRA: Well, even if you didn't receive the -- if it came in at 1:30 p.m. and even if you didn't receive the FOC by 5:00 p.m. say on Monday, you would still have to receive it and depending on how we answer the one question I just walked through, either it will run for three and half hours on Monday, the FOC time, and then another half an hour on Tuesday, so you'd have to have -- your over rider would have to have the FCO back to you by 8:30 the following day and it's eligible then for midnight that night activation.

The other option is that the FOC doesn't -- because the LSR came in after the cutoff on Monday, the FOC clock doesn't start until 8:00 a.m. the following day but you'd still have to have it back by noon and still activate the port that same night.

MS. MILLER: So (unintelligible) the next day irrespective of --

MR. SACRA: You still get to activate --

MS. MILLER: It would still activate by 12:01 the next day. Okay, thank you.

MR. SACRA: Yes.

CHAIRMAN KOUTSKY: Jose has a question.

MR. JIMENEZ: Just very quickly. Under Option A the 1:00 p.m. cutoff time is -- who tracks that, is that the old provider?

MR. SACRA: The old provider, right.

MR. JIMENEZ: Okay, so even if you as a new provider send it at 12:59 and it doesn't get there until 1:02, the old provider says that's it.

MR. SACRA: And again, and that's one of the reasons why we placed or we're going to make it explicit in the flows that we're not saying that the old provider has to consider that to be -- has to be considered received on the following day just because the LSR came in at 1:02 p.m.

You know, they can be more permissive and quite frankly in many cases if an LSR comes in at 1:02 p.m. it's going to be probably FOC almost immediately and if the request was for a next day port it's probably going to be ported -- it very well could be ported that same night so we're not precluding providers from being more permissive in the plan that we're putting together.

CHAIRMAN KANE: (Unintelligible) she mentioned the small providers closing up shop at five o'clock but if it comes in at five o'clock --

MR. SACRA: Right, if it comes in at five o'clock --

CHAIRMAN KANE: You're on your way out the door.

MR. SACRA: Then it would be considered received the following business day.

CHAIRMAN KANE: No, I mean the four hours is up at five o'clock.

MR. SACRA: I'm sorry, say again.

CHAIRMAN KANE: It comes in at 1:00 p.m., the four hours is up at five o'clock.

MR. SACRA: If it came in exactly at 1:00 p.m. or a second before then, the old provider is obligated to get the FCO back no later than 5:00 p.m. that same day.

CHAIRMAN KANE: But five o'clock is when the new provider is going home.

MR. SACRA: Well, the new provider could -- I mean they have the option of activating at midnight that night. They don't have to.

CHAIRMAN KANE: They don't have to, they can wait.

MR. SACRA: The reason that we need to get the FOC back to the new provider is because if they roll a truck for example to dispatch out to the customers PRIM or to their central office they need to know before they go home that they can schedule that and make sure the customer -- especially if they have made contact with the customer.

CHAIRMAN KANE: So it's not that it has to be done by midnight, that's what I understand, thank you.

MR. SACRA: Exactly. Okay, so we had each service provider that participated on the sub-team rank these five options. Again as we kind of do in the working group, you know, our ranking process is to use a kind of golf score, the lowest score means it's, you know, close to the top if you will.

So we had each provider, and I believe the majority of the service providers

that are on the list of the sub-team participants provide their rankings. As Anna said Option A -- actually that was a clear -- there were debates on either side.

I mean obviously there's a desire on the part of some providers to have the LSR cutoff time later in the day than 1:00 p.m. There was also a desire on the part of providers to have a longer FOC interval in order to make sure that they handled anything that falls out.

If they're a mechanized provider, if something falls out of their systems for manual handling they wanted to make sure that they had enough time before they had to return the FOC that they had everything in place so that customer service was maintained and the port could still be activated at midnight that night.

So again we were balancing the needs of the different providers, keeping the focus on the consumer but understanding that the consumer also, their expectation is that they maintain their service when they port.

So we worked through that balancing process and based on the ranking, Option A, at least in my opinion, appeared to be the clear one that received the higher ranks of the providers, the collective providers that provided the rankings.

The other current consensus position in the sub-team is that the business days are Monday through Friday and they exclude the old providers company defined holidays so if it's a Saturday or a Sunday or an old provider defined holiday then it's not considered a business day.

The mandatory staff business hours as I said are 8:00 a.m. to 5:00 p.m. on a business day, Monday through Friday. And in terms of the time zones, I haven't said

anything about time zones yet but all the times that we've discussing the 8 a.m. to 5 p.m., the 1:00 p.m. cutoff, the midnight, 12:01 a.m. activation, those are based on the local time in the predominant time zone of the NPAC region where the customers number is being ported.

So for example, in fact I'll just go right to the next page nine. And the reason why I stress predominant time zone, because for example the western region, they actually have a geography that encompasses three time zones, the mountain, the central, and the pacific time zones but the predominant time zone in the western region is based on -- the geographical area that it encompasses is mountain time so in the western region for example if a customer was porting their number, the service provider, they're expecting the business hours at 8:00 a.m. to 5:00 p.m. mountain time.

The LSR cutoff time would be 1:00 p.m. mountain time and the port would be activated, be eligible for activation at 12:01 a.m. that night mountain time. And you can see I've listed the predominant time zones in each of the seven endpact regions.

The other consensus position is a valid or I guess "a good LSR" meaning that it has the proper data elements populated, that's what starts the clock on when the FOC has to be returned.

A valid or a good LSR to FOC intervals is included in the one business day. For example, in the current four business day interval there is a 24 hour FOC interval and then there's the three day porting interval.

So in essence it's like two intervals. You have the LSR FOC interval outside of the three day porting interval or for the one day business day port we've determined that there is not a separate FOC interval in terms of a day or whatever per an FOC. It isn't in fact included in the one business day interval.

A valid or good LSR must arrive at the old service provider between 8:00 a.m. and 1:00 p.m. on the business day.

You know, after I went back and reread that statement a few times, in fact I think one of our participants at the working group meeting this week asked the very question on that and the question was well, what happens if it comes in at 7:00 a.m. does that mean that its going to be rejected because it didn't come in between 8:00 a.m. and 1:00 p.m.?

And the answer to that is no and perhaps it's not the best way to say this but say if it came in at 7:00 a.m., it's just that the clock on the FOC doesn't start until 8:00 a.m. which is the start of the business day so if it comes in at 7:00 a.m. then the clock for the FOC starts at 8 a.m. so it would have to be returned back by noon, not by 11 a.m. but still by noon. And that would also apply for an LSR that came in at 2:00 a.m. in the morning as well.

The port must be ready to port by 12:01 a.m. next business day so again if the valid LSR gets in by the 1:00 p.m. cutoff time in whatever NPAC region we're in, it has to be the FOC back no later than four hours later and it is eligible for porting at midnight or right thereafter that same night.

CHAIRMAN KOUTSKY: I think we have a question from Jeff.

MR. LANNING: Jeffrey Lanning, Embarq, Corp. I know we're participating in this. Just to understand, the four hour interval, is that a requirement that all fallout be worked within that four hour period as well?

MR. SACRA: Yes, and there are providers that work later than 5:00 p.m. obviously but I guess one possible scenario is that -- I guess the fallout has to be worked.

If the LSR is valid, if it gets in before the cutoff time and the FOC still has to be worked or returned within four hours, something could still fallout in the system downstream but that has to be worked -- well, there is the jeopardy process and I don't believe we're going to eliminate the jeopardy process but if something falls out of system and for whatever the reason the old provider says if this port takes place, this customer is going to lose service, there is the jeopardy process to inform the new provider that something has occurred that needs to be addressed before the port can be activated.

But the expectation is though that fallout has to be addressed during that night before the port is activated at midnight. The expectation is that you -- FOC the port request so you're saying that the port is eligible for activation midnight that night. Does that answer your question?

MALE SPEAKER: Yeah. It was a clarification. That's what I expected the answer was and that's fine. I just wanted to be sure.

MR. SACRA: And we're also grappling with -- the NPAC, they deal in Greenwich mean time in terms of when the timers run and things of that nature when

the port can be activated. They don't deal in mountain time, east coast time, so we need to work through a method of doing a conversion so that the providers that are working these port orders are able to convert whatever time zone we're dealing with to the Greenwich mean time that the NPAC deals with so we're working through a couple of different options on how to deal with that.

The last question that was put to the sub-team participants was whether or not they thought the process to rank the options was a fair process and that the end result was that the consensus was -- they pointed to Option A as the consensus option and it was the consensus of the sub-team participants that the process was fair and that it did point to Option A as the consensus of the sub-team.

And open issues or questions that are remaining that we are circling back and addressing are, and I went over this earlier, about do we need a third set of T1, T2 timers for a simple port obviously much shorter than the nine business hours of the current four day interval and do we need one that's longer than the current wireless timers.

Wireless also has T1, T2 and they are each one hour a piece. And how long should they run, when should they run, and how would the NPAC know which set of timers if we do create an additional set of timers, then that would mean then that we have two sets of timers in the wireline world, one for the four business day interval and one for the one business day interval and right now there is no way for the NPAC to know on a wireline port, on any given wireline port which set of timers to apply.

So if we do have to come up with an additional set of timers then we would need some way of indicating to the NPAC which set to use.

Should there be a defined conflict cutoff time for the old service provider? Currently there is a conflict process with the old service provider. They have up until noon the day before the due date to place an order into conflict.

As an example, they may realize that the wrong number is about to be ported, an inadvertent port. I know some providers have a process where they will cross check LSRs, the telephone numbers on an LSR with the NPAC notifications that they get when the new provider sends up a create message and if they get a create notification with a particular telephone number in it and if they can't cross match that to a local service request from that same provider, then that's a very good indication that the wrong number is about to be ported, that somebody just perhaps put the wrong telephone in the create message.

So in that particular case the old provider has up until noon the day before the due date to place that order in the conflict and work out the discrepancy between LSR and NPAC create message with the new provider.

Obviously we can't have a noon before due date, one business day porting interval, so we're also working through what should be the conflict cutoff time in a one business day interval to allow the old provider to insure that the right number is being ported.

The next one is should the old provider be required to send a concur message to the NPAC. As I said earlier, that's an optional message that the old provider can

send up to the NPAC to concur that the number about to be ported, that they concur with that pending port.

When they do send it up it stops the T1, T2 timers. If they don't send it up then when the T1, T2 timers expire then the control of the port goes back to the new provider and they can activate on the due date. So I guess we're working through whether or not instead of making that an optional step, make it a required step on the part of the old provider.

In terms of the ten digit triggers on a one business day interval, when do we need to insure that they're set, how long should the new service provider have to activate a port after the due date that's been confirmed on the FOC, and once that agreed upon interval expires, then is the old provider then allowed to cancel the port.

And as an example, if the new provider requests the next business day port they don't activate for three days, can the old provider then cancel the port request which would require the new provider then if they still want to port the number to resubmit their order. So that's another question we're dealing with.

What happens if a request fits a simple port requirement but the new service provider has requested a longer due date? So it's truly a simple port but say the new provider has requested a four business day interval for example, then the question is do we revert back to the current NPAC timers for a four business day interval or do we stick with whatever timers that we choose to apply to a simple port.

And this is a question that is very important to a lot of the small rural carriers, should there be a limit on how many port requests a small provider has to accept in a

day to meet the one business day interval.

There are concerns expressed in the sub-team by a number of small providers and associations that represent them that a four hour FOC interval -- they have concerns that that's enough time to insure with all the orders they receive, because a lot of them handle them manually, that four hours is enough time to process all those orders manually and still meet the four hour FOC requirement that was in Option A.

Another question is should wireless providers be given a longer FOC interval due to the manual conversion that they have to process when they're porting out to a wireline provider. There's a manual process of mapping the wireless data elements to the wireline data elements so there was a question raised should wireless providers have a longer FOC interval in order to insure that that mapping takes place properly.

And there still is some talk about the possibility of Saturday activations and what perimeters would have to be in place in order to enable that to take place.

CHAIRMAN KOUTSKY: Gary, I have a question on the third to the last, the one about the limit on the number of port requests in a day. Are the concerns about meeting a FOC interval and is that --

MR. SACRA: It's not only meeting the FOC interval but doing everything that they need to do insure -- like setting the ten digit trigger, all the steps that have to take place in order to insure that the customer service is not disrupted in any way before the port is activated. So it's the FOC interval and it's the setting of the digit trigger that I think were the biggest concerns.

CHAIRMAN KOUTSKY: I guess my question is, is there any indication

in the order that is allowable? That's not the way I read the order.

MR. SACRA: Right. I guess my read of the order is consistent with what you just said but it was a question that was raised and it's a question that -- you know, all the participants are welcome to raise their concerns and it was a concern raised and it's something that we are going to address.

Just to finish up the one business day sub-team, there are some dependencies on other sub-team items and issues and questions that are being worked in other teams as well as in the full LNPA and that is certainly the simple port definition sub-team, if there are any changes that are recommended to the definition of a simple port that may eventually be adopted by the FCC that could have a possible impact on the service providers ability to enable a midnight activation based on Option A so that may be something we just need to revisit if this definition of a simple port is changed, if the LSR process isn't standardized, or if a totally new order process is developed that could have some impact on the one business day sub-team.

One of the things that was discussed in the sub-team but was determined it's kind of beyond the scope of the business day sub-team so we've moved it into the full LNPA and the discussion will take place during the revision of the flows.

But the appropriate method and timing for the old provider to do the disconnect in their donor switch, currently there are three acceptable methods in the NANC flows for when the old provider can disconnect the end user and one is after a positive acknowledgement that the port has been activated to the NPAC, they would withhold the disconnect until they actually see that positive acknowledgement.

The second method is the old provider can disconnect the customer at 11:59 p.m. on the due date plus one so it would be the next day after the due date.

And the third acceptable method currently is the old provider can disconnect at 11:59 p.m. on due date but they have to be available to accept a supplemental LSR to change the due date up until 9:00 p.m. local time in the event that the new provider for whatever reason, if the customer missed an appointment and if the new provider can't activate the port then they have time to issue a supplemental LSR to the old provider to let them know that the due date has to be changed so that the old provider doesn't disconnect the customer at 11:59 p.m. that night.

So there is some discussion going on about the possibility of either eliminating one or two of those currently acceptable options and there is a school of thought that the only acceptable option is to do the disconnect only after the old provider has received a positive acknowledgement from the NPAC that the port has been activated so that's a discussion that we really haven't full vetted. That probably will take place as I said during the flows discussion.

That's it for the one business day sub-team. Any questions?

Moving on to the simple port definition sub-team and again this is chaired by Nancy Sanders of Comcast. The goal of the sub-team is to determine if the working group wants to make any recommendation for any changes or revisions to the current definition of a simple port and do want to include that in the LNPA working groups work package that we will be submitting to the NANC.

As you can see, again there's a pretty wide range of representation from the

industry and we've been holding again at least weekly calls, sometimes twice a week calls, the simple port sub-team as well.

The current definition, and I extracted this not only from the recent FCC order 941 but also this was in FCC order 07188, the interconnected VoIP and the end user validation order.

I think it was originally published in the LNPA working group wireless, wireline integration report back in September of 2000. I think there was at least one week after that it was published but the current definition of simple port, a simple port are those ports that do not involve unbundled network elements, that involve an account only for a single line, do not include complex switch translations, for example, Centrex, ISDN, area in services, remote call forwarding, or multiple services on the loop, and the last criteria was a simple port does not include a reseller.

So we spent a lot of time so far understanding the unbundled network element or the UNE criteria, you know what are the UNEs that constitute an unbundled network element.

We did get a document, one of the participants contributed a document from the FCC that I believe it's seven UNEs that were listed in this document so we delineated them down to specify that UNEs are loops, sub-loops, network interface devices, local circuit switching, dedicated transport, 911 and E91 databases and OSS systems.

We are also researching to see if there's any more recent FCC documents

defining a UNE. So we spent quite bit of time -- we have a reached a consensus that -- none of the participants knew of any example in the industry or any practice currently in the industry where a consideration of an OSS system, or a 911 or an E91 database, or a dedicated transport would have any determination as to whether or not a port is simple or non-simple.

So we have reached consensus in the sub-team that three of the criteria that were in that FCC document OSS system, 911 or E91 databases and dedicated transport are not elements that would impeded a simple port.

We do have a statement that we have out for circulation in the sub-team for consideration and possible revision. The LNPAs working groups understanding of current industry practices regarding UNE involvement in porting a simple port is that the UNEs of dedicated transport, 911//E91 databases and operational support systems are not and have not been a factor in determining or executing a simple port.

Quite frankly there's a possibility that they were at one time, it's just that based on current practice and all the participants in the working group, we could not identify any recent cases where they were a factor in determining whether a port was simple or non-simple so based on the current consensus if nothing changes there may be a statement -- there is a possibility --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 3, SIDE B)

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(START OF AUDIOTAPE 4, SIDE A)

MR. SACRA: Implementation plan as a recommendation to the NANC for your consideration regarding these three examples of the UNE.

The sub-team is going to continue discussions on the remaining simple port criteria that I walked through a minute ago. I believe the next one that we're going to address because I believe there may be some, I'll call it low hanging fruit there that we may be able to reach consensus on perhaps and that is the complex switch translation.

There may be an opportunity to get some agreement on perhaps a recommendation similar to the UNE example that some of the examples currently cited may not be reason for calling a port non-simple but we haven't had that discussion yet.

And I do have to say that there are some varying opinions within the sub-team whether or not this work actually should continue or just be deferred to the FNPRM because that is one of the items that the FCC placed in the notice of proposed rule making, whether or not there should be any revisions to the definition of a simple port.

The decision right now for the sub-team is to continue moving forward but again there is a discussion and some difference of opinions as to whether we should continue.

CHAIRMAN KOUTSKY: Don.

MR. GRAY: Don Gray, Nebraska. I hesitate to ask but I've got to because my boss said and he's been on some state calls where the question is coming up that

the background is given the recent notices of funds available for broadband enhancement BTOP, you pick the alphabet soup that they're using right now, has there been any discussion that perhaps a simple port should include a phone line with DSL associated with it?

MR. SACRA: I thought that was an open item that we were going to discuss but I know there is an interpretation because in fact I was one of the, I called it a tweaker earlier, but when you look at the definition of a simple port that was included in the September 2000 wireless/wireline integration report, it included as one of the examples of multiple services on the line, it included DSL as an example but when the FCC issued order 07188 back in November of '07, that was the change that I referred to.

Actually DSL was removed as an example and the definition of a simple port of multiple services on the line.

So there may be some differences of opinion as to whether or not DSL is simple or non-simple, in fact I'm sure there probably are differences of opinion. I guess the short answer to your question Don is, we haven't had that discussion in the simple port sub-team as to whether or not DSL is simple or non-simple.

MR. GRAY: Okay, thank you.

FEMALE SPEAKER: (Off microphone, unintelligible).

MR. SACRA: Is this one issue beyond the scope?

FEMALE SPEAKER: (Off microphone, unintelligible).

MR. SACRA: Yes, it's after the sub-team, that's correct.

FEMALE SPEAKER: (Off microphone, unintelligible).

MR. SACRA: Right.

FEMALE SPEAKER: And then the second question is, it says may be included as recommendation in the LNP working group's implementation package which of course is implementing the current order. Is that what it is meant to be or is this statement meant to be a suggestion of changing the current definition of simple port to exclude those types of (unintelligible) those UNEs?

MR. SACRA: Our current plan is that for those items that we can reach consensus on to recommend any revisions to the simple port definition, our goal or our current plan is that we would include those as a recommendation to forward to NANC for consideration as to whether or not the NANC wants to forward those to the FCC -- or forward those to the NANC and ask if they would consider endorsing those for forwarding to the FCC for possible adoption.

FEMALE SPEAKER: Okay, because I guess my concern was that it's part of the implementation package versus just a recommendation on a suggestion to the NANC on what NANC might recommend to the FCC.

MR. SACRA: In our May face to face, in fact Chairman Koutsky joined our May face-to-face meeting via a conference bridge and we did discuss that fact that some of these items are items in the I think PRM and whether or not the working group wanted to take on that additional work to see if we could reach any consensus on any items and Chairman Koutsky said that we have an opportunity if we chose to take it to offer up any recommendations since the working group is an arm of the

NANC which is an arm of the FCC and there may be some weight given to a recommendation from the working group would have.

FEMALE SPEAKER: So this would just be a recommendation that you would ultimately to the FCC about changing the definition, not currently implementing it under the current rules?

MR. SACRA: Right, in fact what Chairman Koutsky also reiterated is the current definition is law. That's the law of the land right now, the current definition.

FEMALE SPEAKER: Right, okay. Thank you.

CHAIRMAN KOUTSKY: So if we did have something that we would then transmit to the FCC, we are obviously required to transmit the changes to the process flows and then things are triggered from that change.

This could be part of the same transmittal but it would be a recommendation and at the same time we also recommend that the FCC change the definition to XYZ but it wouldn't have any legal affect, that recommendation whereas the process of changes would and so we'd have to make that clear in the transmittal.

FEMALE SPEAKER: But these would not be part of the -- this statement would not affect the process flows or it would?

CHAIRMAN KOUTSKY: No, I mean only derivatively. Yeah, eventually the FCC would have to make a change to the definition of simple port before that would happen.

MR. SACRA: This statement wouldn't be in the process flows and you're absolutely right, this statement really has no impact on the process flows nor would it

be included in the process flows.

FEMALE SPEAKER: Okay.

CHAIRMAN KOUTSKY: Jeff has a question.

MR. LANNING: Jeff Lanning with Embarq. My company is glad that you're doing this work. Why wait until after an order on the FNPRM to come back and do this work. Let's just do this now and talk it through and get an understanding if we can agree on these things.

And in that regard when you're looking at the DSL, are you also going to be looking at cable modem or a COAX or (unintelligible) for want of better word? In other words we do understand that sometimes there are providers that claim that a cable modem voice service is multiple services on the loop. Is that going to be discussed in the matter of follow-up of respective resellers so --

MR. SACRA: Well, actually that's not (unintelligible) that has come up yet but I'll certainly make a note that --

MR. LANNING: It would seem that if DSL and voice (unintelligible) is going to be looked at that maybe cable modem and voice on a wire ought to be looked at and maybe the same result could be reached, the same thing with respect to a reseller. Would there be analysis of -- I know the order actually -- if you read the order there's some discussion about a controversy around whether being the reseller gets you out of (unintelligible) or not. Is that going to be something where a recommendation may arise as well?

MR. SACRA: Yes, in fact that's one of the four criteria in the current

definition. The current says it does not include a reseller. My read and this is Gary Sacra's read of the order, is that interconnected VoIP providers are not exempted.

There is some understandable analogy between a reseller and interconnected VOIP provider because they are both I guess utilizing an underlying PSTN network provider for access to the PSTN and for numbering resources as well so there is an understandable analogy there.

But my personal read of the order is that interconnected VoIP providers aren't exempted from a simple port with one business day requirement but if you read the definition of a -- when a definition of a simple port was developed there were no interconnected VoIP providers I don't believe back then so my understanding of what they meant by reseller is the more traditional I guess PSTN reseller and the current definition of a simple port excludes resellers but that is one of the things that we are going to touch on in the simple port sub-team as to whether or not we want to make a recommendation to no longer exclude resellers from simple ports.

CHAIRMAN KOUTSKY: José.

MR. JIMENEZ: José Jimenez from Cox. I just want to clarify one thing. I don't know that every interconnected VOIP provider out there relies on a telecommunications company --

MR. SACRA: You're absolutely correct.

MR. JIMENEZ: I just wanted to make sure.

MR. SACRA: When we revised the flows for FCC order 07188, we

actually defined three classes of interconnected VOIP providers in the flows, classes one, two, and three.

Class one would be -- well, Cox as an example, they receive their numbering resources -- I assume you receive your numbering resources directly from NANPA or the pool administrator and you don't rely on an underlying network provider to connect to the PSTN so you would be an example of a class one interconnected VoIP provider.

Class two would be I guess what's been referred to at times at an over the top interconnected VoIP provider that actually connects to the PSTN via probably I guess on a wholesale partner basis with a PSTN network provider and they have to also rely on that partner to get their numbering resources as well so that's a class two.

And then the third class, and I can't think of a real life example off the top of my head, but the third class of interconnected VoIP provider was more analogous to the current PSTN reseller example but this would be an interconnected VoIP provider that is non-facilities based and is utilizing on a wholesale basis the facilities of another facilities based interconnected VoIP provider so it's kind of an interconnected VoIP reselling the services of another interconnected VoIP.

Again, we couldn't think of a real life example of a provider of that type but we thought there is that possibility so we defined that as a class three.

But a long way of saying I absolutely agree with you that an interconnected VoIP does not necessarily mean that they're connected to the PSTN via another

wholesale network provider.

CHAIRMAN KOUTSKY: Greg.

MR. ROGERS: Greg Rogers, Level 3 Communications. I agree that most recent order raises some questions about interconnected VoIP and how that affects or relates to the current definition of what's complex and what's simple as it applies to a reseller, but something you said, I had a question about what the basis would be for looking at interconnected VoIP in a different way from what you would do in a traditional voice PSTN service.

I don't understand how you could come to a conclusion which you seem to suggest that in the interconnected VoIP scenario it would be simple if there's a reseller and in the PSTN situation you would look at that and say it was complex if you have a reseller of a traditional voice service. I don't understand how that could ultimately be the outcome.

MR. SACRA: When you refer to a reseller in the interconnect VoIP space are you talking about like a class two?

MR. ROGERS: I think based on what you just described I would put it in that classification.

MR. SACRA: And maybe I spoke out of school but I was just giving you my recollection of my read. I thought it was explicit in 0941 that the expectation was that interconnected VOIP providers would fall under the one business day rule if there was --

MR. ROGERS: Well again, I agree that it's not entirely clear. I think

the sentence really that controls -- that there is a sentence in the order that says the treatment would be similar from a traditional service to an interconnected VoIP service so however you want to define or distinguish between what's simple and what's complex that would apply equally to an interconnect VoIP reseller as it would to a PSTN reseller situation.

MR. SACRA: I recall in the order it actually refers to a port to and from an interconnected VOIP provider as an intermodal port and the simple port rules apply to wireline to wireline and intermodal ports.

MR. ROGERS: I agree but you still have a reseller, right, which would put it into the complex bucket. If your level three is an underlying provider to an over the top interconnected VoIP provider, you have a reseller scenario so it would be considered in the current definition to be a complex port which I think is the same as a PSTN wholesale, resale arrangement would turn out, and I guess what I'm raising is I don't understand how you could come out on a interconnected VoIP service calling it simple but with a traditional voice instance you'd call it complex with the same basic arrangement.

MR. SACRA: I would exempt every class two interconnected VOIP provider from a one business day porting interval.

MR. ROGERS: Well, not necessarily because you've said there's three separate classes potentially of interconnected VoIP but it presumably would include and address the class two, class three scenario.

MR. SACRA: Well, then I guess we'll have to capture that as a question.

We'll need to --

CHAIRMAN KOUTSKY: And I guess maybe I'll just jump in a little bit here. The class one, two, three, those are things that the LNPA working group has used to classify these for purposes of implementing a 2007 FCC order. Those are not classifications established by FCC. They're basically their shorthand for lack of better term, shorthand for the current process flows which are being rewritten right now so I would encourage participation at that level.

The reading that I take of paragraph nine of the FCC order is that they actually don't use the word reseller as a context, maybe it would say, I'll just quote this for record, "The Commission made it clear that when a interconnected VoIP provider obtains NANP telephone numbers the commercial arrangements with one or more telecommunications carriers the intervals that would be applicable to ports between the numbering partner and the other provider if the port were not related to interconnected VoIP service will apply to the port of a NANP telephone number between the numbering partner and the other provider".

So that's the phraseology that they use which is basically that if an interconnected VoIP provider which is not a telecommunication service, it's an information service, has an underlying telecommunication carrier then the porting interval that would be applicable to that underlying telecommunication carrier is what applies.

So we're tossing around words like reseller. The word reseller has as legal meaning which the Commission has really not utilized in this context as considering

what requires to be resellers because there's a whole wide range of possibilities which is somewhat the reason why the classes one, two, three were set up.

So I just don't want us to be confused about the terminology. To me, I think the Commission is clear with regard to its treatment of interconnected VoIP service which is an information service as not affecting the porting interval for the underlying telecommunication service. So that's my view, since we were talking about the order and I happened to have it here.

MR. SACRA: And that was the phrase that I was recollecting when I made the statement that I did.

CHAIRMAN KOUTSKY: And again for the purposes of the simple port review team, I think what this discussion had highlighted is that there is the FCC's definition of simple port stems originally from a NANC document that was written I believe in 2000 or 2001.

There currently is a further notice open on that but it's certainly within NANC's rights and I would think it would probably be greatly appreciated by the FCC if we were to provide our expertise and input on this at this point in time rather than have them try to write a definition and then us weigh in and say well, you wrote it wrong and that's really not an effective way of creating policy when we have the opportunity now, and now that these issues are highlighted let's frame these and try to come up with an industry consensus resolution as much as possible.

And I would agree with your point that in theory what is the real difference between an interconnected VoIP provider, an underlying carrier, and a simple PSTN

reseller. Is there really an effective difference, should that really affect the porting interval? I would agree that that's actually something that makes sense. I would actually question the reseller exception period myself but that's just again, just me talking.

MR. ROGERS: Well, I guess really what I'm just highlighting is that it doesn't seem like you'd want to have an outcome where you have different treatment frankly. Whether you get rid of the reseller exception or not, if you create a rule that says well, the PSTN rule is that it's complex and the interconnected VOIP rule is that it's simple, that's going to be wrought with confusion I think.

MR. SACRA: I don't disagree.

CHAIRMAN KOUTSKY: I would agree with you that it's wrought with confusion.

MR. SACRA: And I can say we haven't really dug in yet on the reseller criteria as part of it in the current definition. I do know that with anything, there are some differing opinions as to whether or not -- but there are some providers that feel that it should be eliminated as one of the criteria of what a simple port is not and there are other providers that think it should stay but we haven't really dug in with that discussion yet.

CHAIRMAN KOUTSKY: José and then Hank.

MR. HULTQUIST: Hank Hultquist, AT&T. I mean this is a really interesting discussion and I think it's helpful to bring it out and help us see that some of the distinctions may be distinctions without differences so that when we think

about making recommendations on policy I think this will inform our doing so.

But to some extent, I mean I think as with an FCC order there are going to be some gray areas that lead to disagreements and dare I say it, disputes that we may have to deal with the future and maybe we shouldn't spend too much time trying to resolve those disputes today.

CHAIRMAN KOUTSKY: At least now I would agree with that. Jose. I don't feel like I'm cutting off discussion but I want to hear from OBF as well and we have to start thinking about vacating the room.

MR. JIMENEZ: Very quickly, on page six there is actually a bullet that seems to talk about this issue in the open question parking lot issues, third bullet from the bottom.

It says that regarding the steps in the flows addressing the LSR FOC exchange between the network service provider under (unintelligible) provider, was to leave those in there, but we need to clarify in areas that these tests will not slow the process down. I don't know where the genesis of this is but I find that it ties back -- I think it ties back to his discussion and I just wanted to just point that out.

CHAIRMAN KOUTSKY: Anna.

MS. MILLER: Anna Miller, T-Mobile. I'm glad that at today's NANC meeting we received clarification and that we should -- de-clarification if there's consensus to do so because in some of the subgroups that I've been participating in some of the participants seem to say well, here's the words that are there even though they may be words from 2000, and maybe there's some bad examples in

those words. And I even heard today that maybe there's even potential for conflict between FCC orders.

I'm glad that we can get some direction here at the NANC level that clarification is good. We are an advisory council and it would be better to clarify that there is consensus to do so, what we think is appropriate, rather than have the FCC continue with a definition or a reference that really is inappropriate. Thank you.

CHAIRMAN KOUTSKY: Let's move on.

MR. SACRA: I'm going to move through these last three sub-teams rather quickly because I know we're getting up to the wall here.

The next one is the LSR sub-team chaired by Linda Peterman, One Communications. That sub-team is exploring the pros and the cons of service provider and NPAC impacts on identified enhancements to the LSR process in support of the one business day interval.

Again, I've listed the regular participants on that sub-team.

There are a number of major working assumptions I'll say that currently are kind of guiding the sub-team and I'll just highlight a couple of these.

One of the working assumptions, and I think it's just to move them forward with the work that's taking place to standardize the data fields is that their assumption is that the FCC would mandate the use of the OBF standard LSR Rep Type C. Rep Type C is a port only order. I think it's called a Rep Type C, it's a port order that requests an unbundled route for example.

The LSR process is capable of addressing wireline to wireline intermodal porting with not a lot of modifications to the existing process. There will still need to be map, a need to map data elements between the wireline LSR and the wireless port requests as is the case today.

There will still be a jeopardy process in place. I'll skip some of these. As I explained earlier, the jeopardy process is a process that's in place if the old provider realizes that something has occurred that will jeopardize the ability for the new provider to activate the port or the ability for the consumer to maintain their service and there is a process in place to issue a jeopardy to the new provider to inform them if there's a problem.

The last one here, manual and electronic simple port orders will follow the same process timeline. That's their current working assumption that there's not going to be any difference in timeframes, intervals, regardless of whether the provider process is a port manually or by mechanized means.

Current recommendations, when a customer service request is available and requested as part of the preorder activity, it should be returned in a timely manner and we haven't yet determined what that timely manner is so it's an X amount of hours and it's included in the one business day interval.

So this is a pre-port interval just as it is today. It's not included in the current four day interval today. And again the CSR I have to stress is an optional step. Not every wireline port for it is necessary to pull a CSR from the new provider.

One of the reasons and the most frequent reason that I've heard is that

sometimes when a new provider requires the end users account number on the LSR which is one of the allowable end user validation fields.

In order for the new provider to get that account number sometimes they'll pull a CSR from the old provider to get that customer account number so they can properly populate that field on the LSR. So that's one of the main reasons for in some cases needing a CSR and again totally not applicable to the wireless world.

The LSR use would be limited to the wireline to wireline intermodal porting and will not be used for wireless to wireless porting. As I said earlier, we're not touching the wireless process and their WICIS standard.

The standard set of LSR fields being developed by the OBF should be mandated and utilized for both simple and non-simple ports.

And so I can get on to the other groups, there are dependencies on other sub-teams and you can certainly read these other recommendations that are currently coming out of the LSR sub-team.

There are dependencies on the one business day sub-team in terms of FOC interval, the definition of the one business day. There's quite a bit of dependency on the OBF work that's taking place in the LSOP committee on the Rep Type C, standardizing the set of data fields with simple and non-simple. I understand there's going to be a presentation in a minute. And standardized local responses as well.

CHAIRMAN KOUTSKY: Why don't we just while we're thinking about, move on to that and give your voice a break for a little while.

MR. SACRA: Okay, that will be appreciated.

LOCAL NUMBER PORTABILITY EFFORTS PRESENTED TO THE NANC
BY THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY
SOLUTIONS' (ATIS) ORDERING AND BILLING FORUM (OBF)

CHAIRMAN KOUTSKY: Because we're lucky enough to have Sharon Weldon of the OBF here who has volunteered to provide us some information because essentially as Gary said, the subgroup essentially requested OBF to accelerate some efforts that they currently had been working on so she's here to provide us some information just to keep our numbers straight.

I just want to make the LNPA working group Exhibit 14, that report, and then the ATIS OBF presentation we'll make Exhibit 15. Ms. Weldon.

MS. WELDON: Okay, thank you very much. My name is Sharon Weldon. I'm from TEOCO Corporation. I'm here today representing the OBF as co-chair.

I'll go through the beginning of the presentation fairly quickly since we've been using a lot of these terms already today.

OBF is one of the 20 committees under the ATIS umbrella and on slide four I call attention to the funding companies and the participants that helped to make OBF a success and certainly have put a lot of time and effort into the items that I'm going to discuss today.

So on slide five, as mentioned, we've used some of these terms quite a bit today. So LSOP is our local service ordering and provisioning committee that works

on the ordering using the LSR process that is also used for porting that we'll be talking about.

We also have a wireless committee which maintains and runs the WICIS process that we've heard a little bit about today as well. Given that the intermodal porting has become a really big topic and these two committees are within the OBF, we formed the intermodal subcommittee to work together on the porting requirements and so these two teams, the LSOP and the wireless committees work together to move forward the work of the intermodal subcommittee.

Today they are using the LSR for porting between wireline to wireless and there is a mapping that takes place between the LSR and the WICIS process so that those wireless companies can read that so that goes on today and vice versa.

Okay, a little bit of history. I don't want to go back too far but in March of '08, in response to the (Unintelligible) decision as actually was mentioned earlier this afternoon, the LSOP committee developed the simple port service request, the SPSR and as Gary mentioned, while significant work went into developing that, it was not consistently implemented across the industry.

So in April 2008, the intermodal subcommittee undertook a development effort to look at a joint bidirectional intermodal porting simple and non-simple, and what we really looked into was that due to the differences in the business models the requirements and the fields, a consensus was reached that bidirectional one form was not going to be possible.

So that's how we got to what they are today which as I mentioned was using

the LSR for the intermodal porting and doing the conversion but they're still at the same time working proactively to come to streamline the LSR process specifically for porting in for the requirements coming up.

So thankfully I have to say in January of this year, the LSOP committee established issue 3307 which is one of the items on the PIM, you know, kind of the actions on the PIM list and that was to address the industry's need for standardization of number portability, specifically the Rep Type C ordering and processing implementation.

At that time the issue was created, the target completion date was December 31st so the thought was okay, we'll use the duration of 2009 to get this done.

So a little bit about 3307. You know, this is a pretty big issue and we thought we would take the year to look at all of the documents associated with Rep Type C so unnecessary and duplicate fields, validation, simple and non-simple porting, and pretty much a comprehensive end to end look at all of the documents associated.

Well, then in May, we received a request from the LNPA working group for OBFs input into the inclusion and consideration of its report to NANC and based on the FCCs one day interval decision and current work that they were doing, we were asked to submit a standard list of data fields by July 15th, which we talked about and was done yesterday.

So since we received this request, obviously our December 31st timeline was no longer valid and since May, the team has met once and often twice per week over the last two months, both virtually and face to face to try to speed up the timeline.

Any questions?

The LSOP committee in particular developed two standardized sets of fields that may be utilized for number portability only. They are simple ports based on the four field decision, guidelines as well as the one day interval decision, as well as non-simple ports and these are still a work in progress, specifically the port order received for non-simple format and some of those items.

So while the LSOP is focusing a lot of their time on the portability requirements we just note that the LSR is used for local ordering in general and would continue to be something that's in place for ordering even if the porting option decided to go a different way.

Okay, so this month, just catching everyone a little bit up to date because I know a lot has gone on even as recently as yesterday that you all are involved in, on July 9th our intermodal subcommittee met to review the work and the list of fields that our LSOP committee had provided to date and I know we provided some of that information to the LNPA working group yesterday and meeting that deadline.

Our wireless committee is looking at that information and reviewing the information that the LSOP committee has done and we actually have two meetings next week, but one specifically to address these fields that have been identified, both the required and the optional fields, and the agenda for that call includes walking through the fields, discussing how they would be validated, could they be validated, whether or not they need to be required as such, and then taking the wireless communities input into consideration. So we expect maybe an updated list of those

fields after that intermodal call.

And then as the last bullet, I mentioned we did provide an update yesterday including the field to the LNPA working group and will continue to work to meet the deadline.

So as far as next steps go, Issue 3307 needs to be done a little bit sooner than we had originally anticipated but like I said, they're working every week to progress that forward and we do plan to have something to the LNPA working group with enough time for them to take that into consideration before they report to NANC as we discussed, I believe October 29th being the due date for that.

So we will provide something with plenty of time for them to take that into consideration.

CHAIRMAN KOUTSKY: I forgot who was first, but first of all I would just like to express my appreciation for really accelerating your efforts on this. It's very much appreciated and duly noted and you have been very responsive in terms of to the working group I understand in terms of providing them with the information they need to make their recommendation so I appreciate it.

I forget who was first so I'll just go with Cindy.

MS. SHEEHAN: Cindy Sheehan, Comcast. Can you tell me why ATIS considering adding additional data fields beyond the four that were mandated by the FCC?

MS. WELDON: One of the reasons is because once the porting interval was decreased actually to one day, kind of taking into account was that information

needed to speed up that process and I think all along there was the feeling that there was a need for additional data fields anyway even though only four were required.

MS. SHEEHAN: So then are you proposing that although the FCC requires only four that you're wanting to take it back to the FCC to require more? I guess I don't follow.

MS. WELDON: I don't know how far the recommendation will go and because those fields are currently in a long list and there is a draft of what is requested to be required versus not required, that number is larger than four today but that is still part of the discussion so that may shrink down and it may be an extra two fields, it may be more than that, and obviously if it were they would have to take it to the FCC.

CHAIRMAN KOUTSKY: Anna.

MS. MILLER: Anna Miller, T-Mobile. So it's my understanding that the list of fields that we're trying to agree on, what the required list of provision administrative fields should be on the LSR form is that correct?

MS. WELDON: Right.

MS. MILLER: Okay. And I also thank the ATIS for accelerating their efforts because I think it would be beneficial if we could identify a recommendation on what fields we all need to support.

And I guess just a couple of clarification questions because I think at least maybe for me from the wireless perspective, a lot of times I think the wireless industry and the WICIS focus on the porting process in doing a port request form and

fields as opposed to a service request so I always try to differentiate between a port request and a service request.

And so we have the WICIS in which we maintain the wireless port request form and format and then you said that there are wireless committees. So the LSOP and wireless committees that are working on the intermodal subcommittee beyond WICIS, what are the wireless committees?

MS. WELDON: It is our ATIS OBF wireless committee that is responsible for maintaining the WICIS so it is just the one wireless committee within OBF.

MS. MILLER: Okay, so there's one committee, not multiple committees.

MS. WELDON: Exactly, yes.

MS. MILLER: Okay, I was confused. Okay, and so on the intermodal it says ordering and provisioning of local telecommunication services. So is this intermodal working on provisioning of services or is it working on provisioning of processing the port requests?

So again, I get confused. If we're trying to know to do intermodal services versus a port request, so really you're trying to come up with a list of standardized fields for a port request not for a service request.

MS. WELDON: Specifically for this effort for the porting, yes.

MS. MILLER: Okay, because service portability was not mandated, it was local number portability that was mandated.

MS. WELDON: Yes.

MS. MILLER: All right, that helps. Thank you. And so on slide nine then, so there you say you'll continue the need for ordering processes and by that you mean ordering services, ordering local service processes as opposed to the port request process.

MS. WELDON: Exactly. Right, and I guess the point about (unintelligible) if the porting goes a different way and Gary outlined all of the difference options that the sub-teams are looking at, if the LSR process is not selected for intermodal porting, the LSR processing in general will still need to be maintained for provisioning other local services.

MS. MILLER: Okay, so when you say port orders received in a non-simple format must pass non-simple edits before it can go to simple, is that only in the case when you use non-simple for simple instead of the simple for simple?

MS. WELDON: I believe so, and I think there were some further discussions just as recent as last night regarding that particular item.

MS. MILLER: Okay. So you're developing a port -- the fields for the simple port but you could use the non-simple port format for the simple port. So you're developing fields for simple but you don't necessarily have to use those, you can use non-simple or is that to be determined?

MS. WELDON: I think that's still under discussion.

MS. MILLER: Okay, thank you.

CHAIRMAN KOUTSKY: I just have a quick question somewhat related to Cindy's. Is ATIS drawing a distinction between fields that are required for

validation of a port and fields that are required to effectuate a port, or necessary to effectuate a port?

MS. WELDON: Yes, and that's part of the discussion in reviewing fields next week or the July 22nd call, is to kind of look through what can be validated, what should be validated versus not, so yeah, the goal was to go through each one of those fields.

CHAIRMAN KOUTSKY: So will it be presented in that way, to essentially say that the reason this field is required to effectuate a port is XYZ?

MS. WELDON: Yes, that is goal.

CHAIRMAN KOUTSKY: That is the goal. Okay, I realize you're speaking for a committee. It's hard to speak for committees as I know.

FEMALE SPEAKER: (Unintelligible) Sprint Nextel. I am a member of the wireless committee at the OBF and a member of the intermodal community and although it's already been addressed by Chairman Koutsky, the answer to Cindy's question was that the four fields that the FCC addressed in their previous order were for validation and it was the consensus of all the carriers that were applying the ruling for the validation that there were additional fields needed for provisioning and administration and in fact the LNPA came back with at least two which were the SPID and the due date so to actually effectively process the port request you need more than just the four fields used for validation.

To the question that Anna asked and (unintelligible) to step in on this, but my understanding from the conversations as she mentioned as recently as yesterday

afternoon is that the LSOP committee is looking at simplifying the LSR for Rep Type C across the board. They're not creating one specifically for simple versus non-simple. They're looking at simplifying the LSR for Rep Type C period.

An outstanding question that was mentioned and being discussed as Sharon mentioned, I'll use wireless as the example, if a customer comes in to Best Buy to buy the new I phone, so they're porting from one wireless carrier to another wireless carrier who has this fancy new phone, we don't know whether that's a simple or complex port.

We don't use a CSR nor does our vendor who is selling the phone want their employees looking up a customer's record. So when we set the port request up we gather as much information as we can and send it to the old service provider hoping that they'll (unintelligible) through.

In the new rule that we have, simple versus non-simple, again the wireless choice would be to be allowed to gather as much information as possible, have the port request go to the old service provider.

If the old service provider looks at that port request and says this is not a simple port and they discuss it, and I don't know if Gary was going to get to that or not, but one of the options we've been discussing is if the old service provider decides that this is not a simple port, that they distinctly put a due date that is beyond the one day.

Instead of saying the due date is -- they send the port in for Monday and the due date is Tuesday, they would send us back an FOC with a due date of Friday for

example. And we would know then that was not a simple port. That would mean that we wouldn't have to send any LSR.

It would speed up the entire process and that's what we're hoping for but that is as Sharon was pointing out, an item that is under discussion right now as far as the editing process.

Can we go through the editing process and say this -- without having just only the fields required for a simple port. If you have more than the fields required for a simple port populated, would you allow that to be processed as a simple port or would that automatically kick that into the non-simple process. It's a question.

CHAIRMAN KOUTSKY: I'll go with Gary.

MR. SACRA: As I know you know, one of the draft revisions to the flows that we're walking accommodates exactly the scenario you just stated.

There's an opportunity if the LSR comes in with a simple request and if the old provider determines that it's a non-simple port, rather than rejecting the LSR back and having the provider submit a new LSR with the confirmation that the old provider send it back, they just would put a due date on there that's applicable to a non-simple port.

And the other option is it was submitted as simple and the old provider determines that it's not simple and there's not sufficient data on the LSR for a non-simple port, then there's another portion of the flow that would enable the old provider to reject the -- or to send the message back to the new provider stating that it's non-simple and you need to submit the appropriate data for a non-simple port.

So we are walking through those steps in the flow revisions just as Sue stated.

CHAIRMAN KOUTSKY: So it would be that scenario where a carrier places an order thinking it's a simple port, then it turns out to be a multi line customer, it comes back. So that's one reason that you would have a due date field in a simple port request as a shorthand. Even if it's not necessarily populated in the initial order you would still want to have that functionality capability in there, is that my very shorthanded way of --

MS. WELDON: It's a mechanism for communicating, yeah.

CHAIRMAN KOUTSKY: It's a mechanism for communicating back and forth as to whether it's simple or non-simple, okay.

MR. SACRA: Well, if I could answer your question too, Tom. One of the reasons that we walked through this in the working group when we determined that at least two additional fields were necessary to process the port, and Sue the due date --

(Tape Interrupted While Changing Sides)

(END OF AUDIOTAPE 4, SIDE A)

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(START OF AUDIOTAPE 4, SIDE B)

MR. SACRA: The old provider can't necessarily assume that just because it comes in as a simple port that the new provider is requesting a next day port.

It may be a simple port and the new provider is submitting it with simple port data but for whatever reason if the customer requested a two business day port

interval for example, if the old provider assumed that it didn't have a due date or defaulted to a next day, and the new provider really wanted the following day due date, the customer would be at risk of being taken out of service if the old provider assumes an earlier due date than when the port was actually activated.

CHAIRMAN KOUTSKY: So what you're saying is by having that field in there it gives the customer options.

MR. SACRA: Yes, that is one reason.

CHAIRMAN KOUTSKY: As opposed to if it was just the following day the customer who may want their line in two days as opposed to four wouldn't really have an option in the ordering.

MR. SACRA: Plus it eliminates any possibility of miscommunication. The old provider is fully aware of what the due date is that the new provider is requesting based on the customer's needs.

CHAIRMAN KOUTSKY: José has been up for awhile and then I'll go back.

MR. JIMENEZ: José Jimenez from Cox. First of all, thank you for the explanation and the discussion distinguishing between the fields that are used for validation and fields that are used for provisioning.

I'll just throw this out there. I don't know how many more fields are being considered by the OBF or the other committees. I think that there will be a point where -- I think back to what direction the order did when it adopted the four field validation, I think it criticized the industry for having extensive forms and that's why

they went to four.

So I look forward to the next steps in the process but I'm going to be very concerned if the number of fields begins to look unreasonable to us and I think there will come a point where the distinction between validation necessary for effecting a port will be not a distinction at all.

CHAIRMAN KOUTSKY: Cindy.

MS. SHEEHAN: Cindy Sheehan, Comcast. I agree on the four fields that are mandated by the FCC and then we have the best practice in LNPA for the SPID and the due date, however in the (unintelligible) if we're saying you submit an order for a simple port and it could possibly not be a simple port so let's just move it on to the next cycle and go for the four days, I think we definitely need to consider that we're trying -- it seems like it's a little muddy that we're trying to blend.

Once again we're trying to get an all in one order by trying to say well, just in case it's not a simple port give us all the information that you had to give us when it's not simple.

So now this order that we have right now in front of us, 941, trying to get this out to the customer, it's like we're almost adding more work to the process that's really not benefiting the customer because it just adds more work to the service provider.

So again much like Jose, have the concern that we're trying to add too many fields. When the FCC said four fields, we recommended best practices two additional ones in the LNPA. Let's not add too much to it to where there really is no

difference. All we're doing is just a lot of process work.

CHAIRMAN KOUTSKY: Anna.

MS. MILLER: Anna Miller, T-Mobile. Just to try to paraphrase to make sure I'm understanding the conversation, administrative fields are trying to define what constitutes a valid LSR.

So when it says here in Option A by 1:00 p.m. you have to receive a valid LSR, is it correct to say what the fields are doing is saying if you have these fields populated what constitutes a valid LSR? If I translate that into wireless language that would translate to I received an error free simple port request.

So I think what this is trying to do is clarify what constitutes a valid LSR. Once you receive the valid LSR valid port request that's accepted then, you do the validation to accept or reject it. So I don't know if that helps but am I interpreting this correctly?

MR. SACRA: Yes.

MS. MILLER: Okay, thank you.

CHAIRMAN KOUTSKY: Anything else? See, that was easy. Not to cut this off but I do want to go over the other two things.

MR. SACRA: I can be finished right now.

(LAUGHTER)

CHAIRMAN KOUTSKY: Yeah, feel free to go over. I know people have to start getting flights and things like that. If you just want to give a Readers Digest version of the remaining two groups.

MR. SACRA: Sure. I don't want to slight any of the groups. Thank you, Sharon.

Back to page 13, this is the WICIS sub-team, WICIS stands for wireless inter-carrier communication interface specification. This is the wireless standard for the inter-carrier communication process for porting between wireless carriers. That sub-team was chaired by Deb Tucker, Verizon wireless.

And the goal was to determine whether the WICIS standard should be used as a solution in the wireline to wireline intermodal porting world to support a one business day porting interval versus the current local service request that's used for porting in the wireline world.

Very quickly, there were four meetings held. The conclusions were after considering the benefits and the strengths of using the WICIS standard format, the team concluded that there would be a tremendous level of effort required on the part of wireline providers to move away from the current LSR process and move to the WICIS process.

The wireline providers, the LSR processes imbedded, intertwined in the a lot of their systems and processes so this sub-team concluded that given the timeframe that's mandated for implementation, didn't think it was feasible to move the wireline world from the current LSR FOC process to the WICIS process.

So the consensus was reached to disband the sub-team and bring up the participants to become members of the other sub-teams if they chose to.

Any questions on the WICIS sub-team?

CHAIRMAN KOUTSKY: Kevin.

MR. GREEN: Kevin Green, Verizon. On a wireless to wireless port does it require more than four mandatory fields to complete the port?

MR. SACRA: I may have to defer to one of our wireless friends. It's my understanding that it's more than the four validations.

FEMALE SPEAKER: Yes, it is much more than the four. We have somewhere in the neighborhood of over 20 fields that we use but (unintelligible) we all use the same fields so it's all standard which is what allows us to do it in two and half hours.

MR. GREEN: Okay, I just wanted to hear that. I wasn't sure but it just goes to what Comcast and Cox were saying in terms of trying to reduce the number of fields. There just may not be a way to reduce it down to four or six. There may have to be more fields to complete the port.

FEMALE SPEAKER: (Unintelligible) Sprint Nextel. The key for wireless is not the number of fields, and we are working with the (unintelligible) community and again as far as we're concerned the key is not the number of fields, it's rather everybody is using the same fields in the same way.

And if wireless is not using the same fields in the same way no matter how many fields we were using we would not be able to accomplish the port in the time that we are doing it and it is our belief that the one business day FCC ruling will require wireline carriers to follow a similar example where they're using the same fields in the same way.

MR. HULKQUIST: Hank Hultquist, AT&T. I think those comments are

really important to sort of think about and internalize because I think that's exactly right. For this all to work in the end I think part of what the LNPA working group is going to have to do and the NANC is going to have to do is to decide on, here's the set of fields, we're going to recommend that the FCC requires these fields to be used in this way and if we don't do that I don't think this will work.

MR. SACRA: Okay, moving to the last sub-team and this is what was dubbed the out of the box sub-team, chaired by Theresa Patton with AT&T Mobility.

Very quickly, the goal of this sub-team is to investigate are there any other process options, viable process options that the industry wants to consider other than the current LSR FOC process or the current wireless WICIS process in order to process simple ports or perhaps expand to all ports.

So the sub-team is determining the feasibility of each option that they've identified and they plan to provide a recommendation back to the working group.

I guess in a brainstorming session, there were five ideas identified a service bureau option. I'm sorry I just moved to page 14.

This is a process that currently takes place. I know it's very prevalent in the wireless world using a service bureau to process port requests and responses especially in the intermodal porting world and doing the mapping from the LSR data fields to the WPR data fields.

The second one is expanding NPAC to not only currently with the NPAC, create messages that providers send to the NPAC in order to create a pending port. There is discussion about the possibility of expanding the interface and the NPAC

data fields to also include a standardized set of data fields so there would not be an LSR FOC exchange but the standardized data sets would actually be included in the create message that's sent up to the NPAC. So that's the second option.

The third option is a combination of number one and two. Again, that's kind of just been tabled because it depends on the outcome of the deliberations on options one and two.

Option four was a (unintelligible) solution that was kind of brainstormed but after analyzing that it wasn't deemed a viable option. That has been dropped from consideration.

And number five is the LSR WPR mapping. That's really not a new solution. As I said earlier, that takes place today but there were some recommendations for carriers that continue to utilize the current infrastructure, they're recommending that developed by industry standards, set up mapping data elements between wireless and wireline porting data. Update the NANC flows to explicitly state that the simple LSR FOC is translated to and from the wireless port request for wireless back office inoperability.

And so the next steps for the sub-team, they're reviewing the options internally within their respective companies. There is a conference call scheduled next week to gather feedback and discuss the questions from carriers and vendors and then the full committee is going to meet at the LNPA working group meeting on July 27th and 28th and the committee plans on identifying the next steps in obtaining direction from the full LNPA working group.

So I guess my overall conclusion and I believe Paula agrees with me, that the current state of affairs is that we are on track for an on time delivery of our recommended implementation package to the NANC.

Our goal is in the earlier September timeframe in order to give you an opportunity before the next scheduled NANC meeting to have an opportunity to review it so that you'll be prepared for questions for us at the next NANC meeting and also if NANC deems there any need to make any revisions to the package there will still be ample time to do that before the October 29th deadline.

CHAIRMAN KOUTSKY: Hank.

MR. HULKTQUIST: I was just going to suggest it might be really useful to circulate and post sort a deadline calendar of here's when publication in the Federal Register occurred, here's when these things must happen by, so that we all sort of can communicate that back inside of our company and we can have a common understanding of here's the day when we think NANC is going to forward this because I think that will trigger then more downstream --

CHAIRMAN KOUTSKY: Yeah, that's a good point and the order was published not even two weeks ago in the Federal Register or actually exactly two weeks ago. But that's a good idea and I'll pick that up. Thanks Gary for that.

The way I see this as moving forward, when this order first came out and we didn't know how long it was going to be published, I kind of told the LNPA to start looking at Labor Day to try to wrap up their work. I still think that that's a pretty good way for them to be thinking about it.

Right now with the effective date being October 29th, the two weeks I'm targeting for the next NANC meeting are the weeks of September 22nd and October 6th, and once we start to depart from those we start to bump into other industry meetings and I pick Tuesdays for that -- I'd like to have the meetings either on Tuesday, Wednesday, or Thursday. I think that's easiest for most people rather than make people fly in on a Sunday night.

So those are the two weeks that I'm targeting. The idea then is we would have the recommendation from the LNPA working group at least two to three weeks before then and then we would then have built in some time after the next NANC meeting between our meeting on October 29th that would allow us to make revisions to the extent that -- I can't assume that we're just going to adopt it wholesale at the NANC meeting so we're going to need to build in a couple weeks after the NANC meeting to redo things if we need to redo things and still targeting a transmittal approximately around the October 29th date. At least that's my theory working the calendar right now but I'll definitely write it down into a document.

MR. HULTQUIST: Hank Hultquist, AT&T again. I think this extremely informative presentation from Gary illustrates something that we need to be thinking about which is the scheduling of the NANC meeting in terms of time. This is going to be a lengthy presentation to the NANC.

CHAIRMAN KOUTSKY: Yeah, I expect.

MR. HULKQUIST: And if we're also going to be considering the dispute resolution at the same meeting, I mean some of us have been hanging around NANC

long enough to remember when NANC meetings were two days long. We may need one of those. At least keep that in mind.

CHAIRMAN KOUTSKY: Okay. Thanks for that cheerful note.

(LAUGHTER)

That's not a bad suggestion, especially if we do make a review of something and we decide that we do need to change something we can at least then come back the next day and change it. Mary.

MS. RETKA: Mary Retka from Qwest. I want to add on that a thank you Hank for what you said there, but also that if we could rely on getting a little bit more advanced notice on the meetings, I think that's very helpful.

I think some of us heard more advanced information than others on this last meeting, but especially in light of the timing that we're looking at with the timing of some other things going on with the FCC, those of us that work on broadband can clearly appreciate that our days are scheduled in moments so the more advanced notice we can get the better because we do have a lot of preparation work we're going to have to do for this next one as well.

CHAIRMAN KOUTSKY: Okay, understood. And just to reiterate those are the two weeks, the Tuesday, Wednesday, and Thursday of those two weeks that I'm really trying to press on. Anna.

MS. MILLER: Anna Miller of T-Mobile. Just a scheduling note, the NAPM LLC meets September 23rd and 24th so I think there's two very important LNPA working group co-chairs that participate on that so that may not be a good week. I

don't know if it would be possible to do it a week sooner versus a week later especially with some of the concern that was expressed earlier about addressing other NANC issues or NANC dispute issue. Thank you.

CHAIRMAN KOUTSKY: Well, I don't want to go too soon, earlier, I'd rather go -- I mean I could find a problem with almost any day if I needed to with all due respect. We need to slide in against ones that people know are going to be issues and I really do want to make sure that we've built in enough time for the LNPA to pull all of these parts together, and then with enough due time for us to actually sit down and read it and understand it so I don't want to push and have them have to have a meeting and then have a meeting the day after they have a meeting. That just isn't going to work.

Do we have any other questions?

FEMALE SPEAKER: Just a clarification. You mentioned you're trying to do it between September 22nd or October 6th. Did you also say there would be a meeting for certain on October 29th?

CHAIRMAN KOUTSKY: No, October 29th is the deadline for us to transmit this recommendation to the Commission so yes, we need to have our meeting before October 29th and my goal there is to kind of have it a couple weeks beforehand.

FEMALE SPEAKER: So do you anticipate that beyond having -- let's say we have this next meeting that's coming up, do you see beyond a meeting beyond that to the end of the year as well?

CHAIRMAN KOUTSKY: I would anticipate possibly one like maybe early December because there are some end of the year things, so that would be useful, so that's what I would target. Again I believe I was just looking at the calendar between November and December for a different purpose and, there's a lot of things happening then as well. But it will be difficult but we'll figure out something.

Again, my appreciation to LNPA for a tremendous amount of work in the last three months or two and a half months, and actually I'm rather pleased that there appears to be a significant amount of progress in some of the most contentious issues.

I think that if we would have told the FCC back in December that, you know, you just give us a couple months and we could have actually come up with an idea for a business day they might have embraced that.

We'll just kind of move on. We're over time now. We are a public body. We do open the floor out for public comments or opportunities so this is the opportunity for people in the public that have been sitting that have an issue to raise before us, now would be a good time.

Seeing none, I'll just note the few action items that I've taken notes on. I'm sure there are more. We have the NOWG action item to look at the intermediate numbers. That was an issue raised by Chairman Kane and picked up by Don Gray. We sent that to the NOWG.

We have an action item with regard to the INC issue 407 and the NANC

recommendation on that which was essentially we agreed that I would withdraw that and I will try to withdraw it tomorrow. This is just a personal action item for me.

Rosemary had an action item to pick her favorite font for the training manual and to format that. And also just more of a long term for the next few months, for the co-chairs to take a look at the charges of the subcommittees to see if we may want to revise them pending the new NANC charter in the fall.

And then Hank just talked about wanting a calendar for the LNPA implementation deadline and that's a good idea and I'll zip one of those things out and it will be in a memo format, and to the extent that those target dates and days change, I'll update that as well and we'll post that somewhere.

Was there anything else? Mary.

MS. RETKA: (Off microphone, unintelligible) list the forwarding of the PA and the NANPA reports from the (unintelligible) to the FCC.

CHAIRMAN KOUTSKY: Oh, yes, the transmittal of the evaluations. Perfect. Thank you, Mary.

And is that it? If that's all, I appreciate everybody's patience today. We remained consistently an hour and half behind so at least we were consistent about that. I appreciate everybody's time today and I look forward to seeing you all in a couple of months. Thank you.

(END OF AUDIOTAPE 4, SIDE B)

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CERTIFICATE OF AGENCY

I, Carol J. Schwartz, President of Carol J. Thomas Stenotype Reporting Services, Inc., do hereby certify we were authorized to transcribe the submitted cassette tapes, and that thereafter these proceedings were transcribed under our supervision, and I further certify that the forgoing transcription contains a full, true and correct transcription of the cassettes furnished, to the best of our ability.

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PRESIDENT

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