

NANC

**2010
PA
Performance
Evaluation
Report**

**Prepared by the
Numbering Oversight Working Group (NOWG)**

May 10, 2011

2010 PA Performance Evaluation Report

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Executive Summary

The FCC and the North American Numbering Council (NANC) charged the Numbering Oversight Working Group (NOWG) with compiling and delivering an annual performance report of the Pooling Administrator (PA). The PA's annual performance assessment is based upon:

- 2010 Performance Feedback Survey
- Written comments and reports
- Annual Operational Review
- NOWG observations and monthly interactions with the PA

The PA's rating for the 2010 performance year was determined by the NOWG to be **MoreThan Met**. This rating is defined below:

MORE THAN MET	Met and often went beyond performance requirement(s) <ul style="list-style-type: none">• Provided more than what was required to be successful• Performance was more than competent and reliable• Decisions and recommendations usually exceeded requirements and expectations
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The 2010 survey results revealed a high level of satisfaction that respondents attributed to the professionalism, responsiveness, and expertise exhibited by the PA personnel throughout 2010.

In 2010, the PA consistently provided more than what was required of their responsibilities. Highlights included:

- The PA reached out to state regulators in 2010 for assistance on the NPAC Scrub Project. This outreach resulted in resolving 53% of the over-contaminated blocks, decreasing the total from 530 to 279.
- Initiated a "Seeking Donations" project in 2010 which resulted in securing block donations for rate centers being changed from Excluded to Optional, saving the opening of 14 NXX codes.
- The PA proactively developed training videos to enable 24/7 access to training. In 2010, there were five training videos posted.

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Section 1.0 Performance Review Methodology

The annual PA Performance Evaluation is a summary of significant events that were accomplished during the 2010 performance year. In addition to the annual performance review survey process, the NOWG interactions with the PA included the following:

- Annual operational review
- Change Order review process
- PA NANC reports
- Monthly NOWG/PA status meetings
- Interaction with the industry

The methodology used by the NOWG in weighting the quantitative responses from the surveys is as follows:

Each rating category was assigned a point value (Exceeded = 5, More Than Met = 4, Met = 3, Sometimes Met = 2, Not Met = 1). The NOWG multiplied the corresponding point value by the number of responses in that category and then divided the results by the total number of respondents to the question.

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The following chart provides the definition of each rating category:

Satisfaction Rating	Used when the PA...
EXCEEDED	Exceeded performance requirement(s) <ul style="list-style-type: none"> • Provided excellence above performance requirements and exceeded expectations • Performance was well above requirements • Decisions and recommendations exceeded requirements and expectations
MORE THAN MET	Met and often went beyond performance requirement(s) <ul style="list-style-type: none"> • Provided more than what was required to be successful • Performance was more than competent and reliable • Decisions and recommendations usually exceeded requirements and expectations
MET	Met performance requirement(s) <ul style="list-style-type: none"> • Met requirements in order to be considered successful • Performance was competent and reliable • Decisions and recommendations were within requirements and expectations
SOMETIMES MET	Sometimes met performance requirement (s) <ul style="list-style-type: none"> • Was inconsistent in meeting performance requirements • Performance was sometimes competent and reliable • Decisions and recommendations were sometimes within requirements
NOT MET	<ul style="list-style-type: none"> • Did not meet performance requirement(s). • Administrative tasks and objectives were not within requirements in order to be considered successful • Performance was unreliable and commitments were not met • Decisions and recommendations were inconsistent with requirements
N/A	<ul style="list-style-type: none"> • Did not observe activity or does not apply to service provider/regulator

The NOWG will present preliminary findings to the FCC and the PA. The final report will be presented to the NANC for endorsement and then forwarded to the FCC.

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Section 2.0 PA Reports

2.1 PA Annual Report

The Pooling Administrator Technical Requirements document requires the PA to produce an annual report. This document should report the status of pooling and Pooling Administration, and is to be published annually. Review of this annual report is part of the NOWG's annual performance review process. At a minimum, the annual report is required to contain the following information:

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

Prior to this year's on-site operational review, the PA provided the NOWG with an opportunity to review the draft copy of their 2010 annual report. During the on-site operational review in Concord, California in March 2011, the PA staff reviewed the 2010 highlights which were also included in their annual report.

Overall, the report provides a comprehensive snapshot of the current state of affairs for 2010. The PA 2010 Annual Report was filed with the FCC and is posted for general availability on the PA's website at www.nationalpooling.com.

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2.2 PA NANC Report

The PA reported its monthly numbering activities to the NANC and the NOWG. Additionally, the PA made presentations at the NANC meetings in February, May, October, and December 2010, reporting the status of thousands-block pooling administration and events affecting the performance of the PA, which included the following:

- Volume of pooling assignments, donations and applications processed
- Blocks opened to replenish pools and establish LRNs
- Pools with less than six months inventory vs. forecasts
- Summaries of monthly reports to the FCC
- Number of blocks reclaimed
- 99.996 percent availability of PAS
- Status and implementation of change orders
- Updates to PAS
- Updates to the National Number Pool Administration website
- Results of the 2010 Pooling Administration Survey

2.3 NOWG Monthly Reports

Throughout 2010, the NOWG and PA followed a standing agenda during the scheduled monthly calls. The PA provided monthly performance reports for the NOWG that were reviewed during the monthly calls. The quality and content of these reports provided the NOWG with valuable insight into the operations of the PA.

See Appendix A for the Standing Agenda.

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Section 3.0 Customer Focus / Issues Log

Customer Focus

In 2010, at the monthly NOWG/PA meetings, the PA provided a report on customer focus items that they executed to help service providers and regulators. Customer focus items cover both contractual and non-contractual initiatives related to customer service.

There were 73 customer focus items from January 2010 through December 2010. Some of those items included the following:

- Provided assistance to service providers on block donations
- Provided time-saving and special reports for both Service Providers and Regulators
- Provided education and assistance on p-ANI resources
- Provided individual, regulatory and website training

PA/NOWG Issues Tracking Log

The tracking log is used to document ongoing issues. The log, which includes metrics on the create date, issue name, summary and status, keeps the NOWG informed until issues are brought to resolution/closure.

There were no new issues added to the log in 2010.

In January 2010, the PA submitted a no cost change order (Change Order 12) to remove the “Quantity Due to SP Deficiency/Misunderstanding” language from the Monthly Pooling Metrics Report (Section 2.22.4). This change order was a result of findings on the trouble ticket reporting process that was an item added in 2009 to the tracking log. The change order was approved, and the issue on the tracking log was closed in February 2010.

See Appendix B for the Issues Tracking Log.

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Section 4.0 2010 Performance Survey Results

4.1 Survey Ratings – Quantitative Analysis

The PA 2010 Performance Surveys were completed by a total of 87 respondents:

- 31 Regulator Respondents
- 56 Industry and Other Respondents

The results are as follows:

- Pooling Administrator (Section A)
 - There were four questions in this section to which respondents provided the following aggregated response ratings:
 - 110 as Exceeded
 - 71 as More than Met
 - 37 as Met
 - 1 as Sometimes Met
- Implementation Management (Section B)
 - There were two questions in this section to which respondents provided the following aggregated response ratings:
 - 27 as Exceeded
 - 26 as More than Met
 - 14 as Met
- Pooling Administration System (PAS) (Section C)
 - There were three questions in this section to which respondents provided the following aggregated response ratings:
 - 87 as Exceeded
 - 89 as More than Met
 - 56 as Met
 - 2 as Sometimes Met
- PA Website (Section D)
 - There was one question in this section to which respondents provided the following aggregated response ratings:
 - 28 as Exceeded
 - 39 as More than Met
 - 18 as Met
 - 1 as Sometimes Met

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- Miscellaneous Pooling Administration (PA) Functions (Section E)
 - There were four questions in this section to which respondents provided the following aggregated response ratings:
 - 99 as Exceeded
 - 100 as More than Met
 - 48 as Met
 - 3 as Sometimes Met
- Overall Assessment of Pooling Administrator (PA) (Section F)
 - There was one question in this section to which respondents provided the following aggregated response ratings:
 - 33 as Exceeded
 - 44 as More than Met
 - 9 as Met

See Appendix C for Numerical Survey Results, Appendix D for the Numerical Bar Charts, and Appendix E for the Cover Letter and 2010 PA Performance Survey.

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4.2 Written Comments

The survey allowed respondents the opportunity to provide detailed written comments regarding their satisfaction or dissatisfaction with the PA's performance in 2010. The vast majority of comments were positive, with only a few containing suggestions for areas of improvement. The NOWG reviewed all comments to determine if there was a common theme substantiated by multiple respondents.

Following is a summary of written comments that were provided by survey respondents.

- Outstanding praise for the PA staff was a consistent theme throughout the survey:
 - Responds to questions quickly and courteously.
 - Always very pleasant to work with and extremely helpful.
 - Provides a high level of expertise and professionalism.
 - Informative and eager to assist.
- Comments suggesting improvements were mostly isolated. Notable comments pertained to:
 - PA Help Desk backup support.
 - Training of the PAs to improve the accuracy of responses and to increase their understanding of the pooling administration process.

The NOWG concluded that the written comments were not indicative of any consistent performance issues, and in many cases provided significant praise for individual PA staffers. Samples of the written comments received are provided below:

“The PA continues to provide a high level of service and satisfaction. Our interaction with individuals is always pleasant and results in the correct and appropriate course of action in a timely manner for both Commission needs and carriers we interact with.”

“I can't provide specific situations however each time that I needed assistance with the Pooling Administration personnel, they were always very pleasant to work with, extremely helpful and resolved any issues, questions or help that I needed.”

“I am very pleased with the level of expertise exhibited by the PA staff. The PAS is readily available for our Staff's access and the information is always updated and accurate.”

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“Very impressive agency; well organized, excellent support team, and the timeliness is incredible.”

“In 2010, the PA provided great customer support to their customers. They were timely and efficient in processing applications and provided special reporting whenever asked. All staff are to be commended for a job well done in 2010.”

“All interactions with the PAs were outstanding. I have no complaints. They are very accommodating and eager to resolve concerns. Very prompt to respond or follow-up to my calls. Turnaround time to provide approval on requests is well within the guidelines.”

“I'm always very pleased with the assistance the PA provides me.”

See Appendix F for the List of Survey Respondents and Appendix G for the Survey Comments.

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Section 5.0 Operational Review

The NOWG members met with the PA representatives in Concord, California on March 16 and 17, 2011 to conduct the annual on-site operational review. During this review, the PA staff presented highlights and an overview of 2010 activities. This included Pooling Administration operations, NANP resource trending, external relations and training, change orders, pooling quality assurance, and regulatory and compliance.

Additionally, the PA staff also presented the status of RNA (Routing Number Authority) p-ANI (pseudo-Automatic Number Identification) administration, escalations, industry forum participation, technical operations, pooling reports and special projects.

Some of the key highlights presented to the NOWG included:

- Total Applications Processed in 2010:
 - issued 102,368 Part 3s (this was a 17% increase from 2009)
 - assigned 434,364 thousands blocks
 - opened 2,667 CO codes
 - 99.998% of all applications processed within 7 calendar days or less (requirement is 97%)
- Customer Support Desk received 3,084 calls; 100% answered within one business day
- Trouble Tickets:
 - opened 15 new trouble tickets in 2010
 - closed two trouble tickets from 2009 and 14 of the 15 trouble tickets from 2010
- Reclaimed 82 blocks
- The “Old Overdue Part 4” Special Project was again expanded in 2010, adding an additional 63 blocks to the list. As of December 31, 2010, there were only 11 very old Part 4s remaining unresolved.
- PA conducted their survey with service providers in 2010 receiving an overall average score of 4.68 out of a possible 5.0 based on 24 statements. There were 18 statements that had an increase in rating from the previous year and three that remained the same. Three of the statements were new in 2010 with no trending available.
- Training:
 - conducted web based training sessions for service providers and regulators
 - new in 2010 was the addition of training videos on the PA website which provides service providers and regulators the ability to take the training as their schedules permit
 - conducted internal training sessions on M&Ps, guidelines, database enhancements

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- In 2010, the PA initiated a project to seek voluntary donations when a service provider requested that an Excluded Rate Center be changed to Optional. This effort resulted in donations received for 14 rate centers out of 33 requested rate centers – saving 14 codes.
- Worked on the p-ANI change order for the permanent Routing Number Authority (RNA) Administrator
- Provided reports to the FCC, state regulators, NANC, NANPA and NOWG
- Facilitated four Supplemental Implementation Meetings – Pennsylvania (two meetings), Indiana and Alaska
- Implemented eight changes orders and two maintenance builds
- Participated in 81 industry meetings: NANC, INC, CIGRR, FoN, NRRIC, LNPA-WG, and ESIF-ECDR
- No formal complaints made to PA
- Completed redesign of the PA website which included a training video on the changes
- Met or exceeded all system requirements with 99.996% availability – exceeding the contract performance metric of 99.9% availability

PA presentations shared at this meeting can be found in Appendix H. See Appendix I for the PA Highlights.

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Section 6.0 Pooling Administration System (PAS)

The Pooling Administration System (PAS) was available 99.996% of the time during 2010 – even during update and maintenance builds (which included eight change orders and two maintenance builds).

The eight change orders and two maintenance builds included the following changes to PAS:

- Part 5 forms are now viewable and printable by users.
- PAS now validates – upon submission of a block disconnect – if the block was assigned as part of a Dedicated Customer Code request.
 - If a CO Code Part 4 is on file, PAS will allow the submission of the block request.
 - If a CO Code Part 4 is not on file, PAS will return an error message.
- Added the new tool *Multiple Block Modification* to allow processing of the same type of change on multiple blocks instead of doing the change on each individual block.
- Changed the term “LERG Assignee” to “Code Holder” on Code Activation PSTN reminder, Part 1B, Part 4 PA, Part 5 forms and applicable screens in PAS.
- Changed the earliest possible expedited effective date on block modifications and disconnects from 8 business days to 9 business days from the date the PA processes the request.
- Replaced the check boxes regarding Part 2 forms and “additional documentation” with text.
- Added new “Copy Block Request” and “Copy Code Request” tools allowing users to copy an existing request and modify the information as needed for a new request.
- Added a new field “Designated Point of Contact for Reclamation” for SP users.
- Added 4 new columns – “Pending Disconnect”, “SP Contact”, “SP Contact Email” and “SP Contact Phone” – to the *List of Overdue Part 4 Report* for regulatory users.
- Corrected an issue with the “Designated Point of Contact” contained in a User’s profile.
- Added a new report to the website entitled “*All Regions for Available, Retained, and Assigned Blocks (Augmented)*”.

In addition, two disaster recovery tests were completed by:

- Switching the PAS to the backup site in Charlotte, NC and returning it to the main location in Sterling, VA
- Testing designed to ensure Neustar’s ability to reestablish the PAS Operating System and Applications in the event of a catastrophic failure.

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While the PA is contractually allowed nine hours of unscheduled downtime and 24-hours of scheduled downtime, they only had 21 minutes of unscheduled downtime during a routine “failover” test and still exceeded the contract performance metric of 99.9%.

Overall, the industry was satisfied with the performance of PAS. This is apparent in the comments received on the surveys:

“The Commission often accessed the reports and data previously submitted by carriers and finds the PAS a convenient way of finding the information.”

“PAS continues to be an excellent database.”

“PAS has definitely become more user friendly over the past year or two, especially with features like being able to save a request. PAS is easy to navigate overall. I love the ability to do multiple block modifications.”

“So far that I’ve used PAS, it’s really great. I have not come across any problems yet. It’s easy to navigate.”

“The PAS is a very user-friendly tool. Our <DELETED> Staff accesses the PAS several times each month to obtain specific information regarding Part 1/1a and Part 3 Reports. A plethora of additional information is also available to each State Staff.”

“PAS data provided to NANPA for the new Donation Discrepancy Report (DDR) contained block discrepancies which appear to have been long-standing and known problem to the PA. Block Donations made during the initial Pooling Implementation in 2001 and 2002 appeared on some state reports. Historical copies of our records (emails and donation spreadsheets) showed these blocks were donated, but were apparently were not processed correctly by the PA. With the various clean-up efforts that have taken place over the last 8 to 10 years, it seems odd these discrepancies are just now being addressed. In preparation for the DDR implementation, the PA could have verified the BIRRDS block records to see these blocks were not assigned to the Service Provider, checked past donation records, and then corrected the discrepancies and PAS. The time and effort spent by Service Providers to rectify these PAS discrepancies and old PA processing anomalies could have been avoided. The addition of the multiple block modification feature has been a helpful tool to reduce Service Provider time in connection with making mass changes for example in cases involving switch conversions.”

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“INC [TBPAG] Guideline 4.3(d) The nexus in the PA system that matches carrier name and OCN, does not reflect when a carrier has had their state certification revoked, if the carrier requested to have their certification rescinded, or if the carrier has changed their name, but has not changed their OCN to match their new name. States realize that NECA provides the OCN; however, when a state notifies the PA that the carrier name is no longer valid in the state, I believe that the request for blocks or codes should be denied or suspended. I do not know if there are only specific reasons for denial or suspensions and this situation must be changed by the INC.”

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Section 7.0 Change Orders

In 2010, the PA filed eight new change orders with the FCC. The PA change order process complies with FCC contractual requirements. The 2010 change orders included:

- NOWG and Regulator-Proposed Enhancement to PAS
- Changes to Trouble Ticket Reporting
- Code Holder versus LERG Assignee
- Update TBPAG Expedite Process
- Removing Attaching Part 2 forms from CO Code request (Part 1)
- Proposed enhancements to PAS
- Additional Block Report for All Blocks
- Clarify the Definition of "In Service" in the Guidelines

In 2010, the PA completed the implementation phase of eight change orders approved by the FCC.

See Appendix J for the Change Order Matrix.

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Section 8.0 National Pooling Website

The website maintained by the Pooling Administrator provides number pooling information to service providers and regulatory agencies. In 2010, the PA initiated and implemented a redesign of the PA website. The layout of the website continues to be user friendly and information is current and easy to locate.

The PA conducted three web-based training sessions in 2010 for service providers and regulators.

The following are some comments regarding the website that were provided by the survey respondents:

“I appreciated the modifications make to the PA’s website in late 2010, and the training session offered to state commissions to review those changes.”

“The new website is very user friendly and easy to manuver [sic] through; I thought the course provided was also extremely helpful in orienting me with the changes.”

“The PA website is easy to navigate and provides relevant data as needed.”

“The website makeover was well done. It is easy to navigate and find info quickly.”

“The re-designed National Pooling website introduced feature enhancements that were easy to use and most beneficial. These enhancements and the way they were implemented “more than met” our expectations.”

“The new enhancements have provided a tool that has simplified navigating through the website. The training that was offered and scheduled prior to the changes was extremely helpful.”

The NOWG commends the PA on their efforts undertaken in 2010 to make the website more user-friendly and informative.

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Section 9.0 p-ANI

The PA continued to serve as the Interim Routing Number Administrator (IRNA) for pseudo-Automatic Number Identification (p-ANI) in 2010. There were three Emergency Service Query Key (ESQK) registrations received in 2010, of which two were approved and one was denied. There were 242 ESQK requests received, of which 240 were approved and assigned resources.

The PA participated in meetings and worked with the INC and ESIF on continuing to modify the permanent p-ANI Administrative Guidelines that were created previously. These modifications were based on new findings by the IRNA in the development of the change order.

Acting as the IRNA, the PA proactively attended the following:

- Colloquium on Public Safety and Homeland Security Portion of the National Broadband Plan on March 31st.
- FCC's Workshop on Critical Infrastructure and Information Collection on April 13th.
- FCC's Speaker Series Event Featuring NIST's Office of Law Enforcement Standards on August 31st.
- T3 Webinar on NG9-1-1 What's Next Forum & Webinar on September 23rd & 24th.

The IRNA also assisted carriers, states, and VPCs (VoIP Positioning Centers) with issues relating to ESQK assignment by other administrators.

The IRNA received a letter on December 14, 2010, from the FCC, clarifying policy concerns and directing them to file the Permanent p-ANI change order.

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Section 10.0 Conclusion and Recommendation

The NOWG based its 2010 PA Performance Evaluation Rating on documentation, information collected, and observations throughout the review period year. Although emphasis continues to be given to the numeric and written survey comments, survey respondents may not always be familiar with the activities of the PA that occur “behind the scenes.” For the 2010 performance evaluation rating, the NOWG considered PA activities that included interaction with the NOWG and the NANC, and active participation at INC and other industry forums.

The survey results revealed a high level of client satisfaction with the continued professionalism and expertise exhibited by the PA personnel when performing their PA duties. The PA continued to demonstrate their ability to handle the large volume of block applications, while simultaneously completing special projects.

In reviewing the rating criteria for the PA, the results of the data analysis yielded a “More Than Met” rating for the 2010 performance year.

The NOWG makes the following recommendations for the PA’s consideration:

- Review internal training processes to ensure that consistency in understanding the processes and responding to service providers is communicated to the PA personnel.
- Continue the proactive NPAC Scrub project to clean-up the over contaminated blocks in the PA inventory.
- Ongoing review of the website to ensure accuracy and timeliness of data.
- Work with the NOWG on review and evaluation of current reports submitted to the NOWG for monthly standing agenda calls

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Section 11.0 Acknowledgements & NOWG Participants

The NOWG wishes to thank the following Neustar PA employees for assisting the NOWG during the annual operational review and with participating in the NOWG's monthly meetings.

List of PA Participants

Bruce Armstrong
Jan Connally
Tara Farquhar
Dara Flowers
Kevin Gatchell
Linda Hymans
Wayne Louie
Cecilia McCabe
Amy Putnam
Shannon Sevigny
Florence Weber
Gary Zahn
PA Help Desk and Pooling Administrators

The following working group members have participated in varying degrees by attending NOWG meetings throughout the year, attending the annual operational review, and contributing to the development of this document.

List of NOWG Participants:

Participant

Bruce Bennett
Laura Dalton
Jan Doell
Rosemary Emmer
Ruben Galvan
Paula Hustead
Natalie McNamer
Linda Peterman
Beth O'Donnell
Linda Richardson
Karen Riepenkroger
Rita Schmitz
Gwen Zahn

Company

Qwest Communications
Verizon Communications
Qwest Communications
Sprint Nextel
XO Communications
Windstream Communications
T-Mobile USA
EarthLink Business
Cox Communications
AT&T
Sprint Nextel
CenturyLink
Verizon Wireless

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Section 12.0 List of Appendices

- Appendix A 2010 PA / NOWG Standing Agenda
- Appendix B 2010 PA NOWG Issues Tracking Log
- Appendix C 2010 PA Survey Numerical Results
- Appendix D 2010 PA Survey Metrics Bar Charts
- Appendix E 2010 PA Survey Cover Letter and Performance Survey
- Appendix F 2010 PA Survey Respondents
- Appendix G 2010 PA Survey Respondents' Comments
- Appendix H 2010 PA Operational Review Presentation
- Appendix I 2010 PA Highlights
- Appendix J 2010 PA Change Order Matrix Log