**North American Numbering Council**

Numbering Oversight Working Group

November 28, 2012

Honorable Betty Ann Kane

NANC Chairman

1333 H Street, N.W., West Tower 7th Floor

Washington, DC 20005

# RE: NOWG Proposal for a Consolidated Numbering Administrator Contract - for NANC Distribution

Dear Madam Chair,

During recent NANC meetings, the Numbering Oversight Working Group (NOWG) obtained the NANC’s approval to conduct an evaluation of the benefits and risks of consolidating the contracts of the North American Numbering Plan Administrator (NANPA) and the Pooling Administrator (PA). The NOWG proposed this idea to the NANC because our role as the oversight committee for the NANPA and the PA puts the NOWG in a unique position to observe redundancies that we believed could possibly be eliminated by combining the two contracts into one. Our interest in conducting this exercise was not due to any dissatisfaction with the performance of the current administrators, but was motivated by the desire to explore efficiencies that may be gained by one unified contract.

Additionally, as shown below, the FCC’s Numbering Resource Optimization Order (CC Docket No. 99-200) which established Pooling Administration in 2000, recognized that there may be a benefit to looking at this issue in the future.

In FCC 00-104, paragraph 152, the FCC stated:

152. We acknowledge that it may be desirable in the future to link the thousands-block number pooling administration and central office code administration duties to take advantage of any synergies that may exist between these functions.

The NOWG held several sessions to discuss consolidation of the NANPA and PA administrator contracts. The NOWG’s activity focused on identifying potential Service Provider and Regulator operational efficiencies and impacts in consolidating the contracts. We also looked at the idea of combining the numbering guidelines, and discussed the benefits and risks associated with having a single user interface for the numbering systems (PAS/NAS). Since we did not have access to cost data that would need to be provided by current and potential vendors bidding for the Numbering Administrator contract, the NOWG worked under the assumption that over a contract period, the industry would realize a cost savings based on a single contract versus the two separate contracts.

The details of the NOWG’s operational analysis are contained in the attached document. As a result of our analysis, the NOWG reached consensus on the following recommendation:

**The NOWG recommends that the FCC consider consolidating the NANPA and PA Administrator contracts. For the FCC’s consideration, the NOWG provides the attached input which documents some of the benefits and risks of a contract consolidation.**

The NOWG requests that the NANC endorse the above recommendation for submission to the FCC.

Please feel free to contact any one of the NOWG co-chairs if you have any questions or require additional information.

Thank you,

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**Numbering Oversight Working Group (NOWG):**

**Evaluation of Benefits and Risks of Consolidation of the NANPA and PA Administrator Contracts**

**Benefits:**

* One Administrator to oversee the supply and distribution of the numbering resources of the North American Numbering Plan (NANP)
* Unify contracts to attain synergies in having a single contract, single bid process, and a single vendor
  + No need for separate change orders when PA and NANPA systems are both affected, thus producing a single timeline for changes
  + Conservation of resources in the industry (potential vendors) by having to respond to one RFP rather than two
  + Larger scope of the combined contract may be more attractive to potential vendors than two separate contracts, potentially incenting more vendors to compete for the contract
* Operational efficiencies (reduced redundancy of certain functions)
  + Reduction of processing days from 14 to 7 when opening new codes and modifying and disconnecting existing codes in pooling areas by allowing parallel processing of both PA and NANPA functions
  + Single user interface would eliminate the need for pooling pass through requests between NAS and PAS, and separate passwords for each system
  + One system to submit NRUFs and PA forecasts
  + Single website for service providers and regulators to obtain reports and other information about numbering resources without duplication of information
  + Training for new SP employees on one system for number administration
  + Efficiencies for carriers and regulators in having one Numbering Administrator as a single point of contact for numbering questions and issue resolution
* Combine rules for the NANPA and the PA
  + The FCC may want to revisit the CFR sections that apply to both the NANPA and PA to determine if those need to be combined
* Simplified ongoing guideline updates due to unified INC guidelines (Consolidated COCAG and TBPAG)

**Risks:**

* Unknown changes to the structure of the vendor(s) organization and potential resulting impacts on Regulators and Service Providers
* Need for development of a single user interface (combining NAS/PAS into one system)
  + upfront costs of developing a single NAS/PAS system
  + training of vendor staff to support single system
  + combining the NANPA and PA websites into one website
  + changes to SP internal back office systems that interface with PAS/NAS and retraining of SP staff
  + some SP’s do not participate in pooling and do not access PAS today, so to combine the two systems may confuse those SP staffs
* Required FCC contracting changes
* Industry resources necessary to consolidate INC guidelines (COCAG and TBPAG) to coincide with the contract consolidation

**Definitions of Acronyms:**

NANP – North American Numbering Plan

PA - Pooling Administration

NANPA – North American Numbering Plan Administration

RFP – Request for Proposal

NAS – NANP Administration System

PAS – Pooling Administration System

NRUF - Numbering Resource Utilization/Forecast

SP – Service Provider

CFR – Code of Federal Regulations

INC – ATIS Industry Numbering Committee

COCAG – Central Office Code (NXX) Assignment Guidelines

TBPAG – Thousands-Block Number (NXX-X) Pooling Administration Guidelines

FCC – Federal Communications Commission