

**North American Numbering Council  
Meeting Transcript  
September 18, 2013 (Final)**

**I. Time and Place of Meeting.** The North American Numbering Council (NANC) held a meeting commencing at 10:00 a.m., at the Federal Communications Commission, 445 12th Street, S.W., Room TW-C305, Washington, D. C. 20554.

**II. List of Attendees.**

Voting Council Members:

- |                                       |                                   |
|---------------------------------------|-----------------------------------|
| 1. Hon. Betty Ann Kane                | NANC Chairman (NARUC – DC)        |
| 2. Hon. Geoffrey G. Why               | NANC Co-Chairman (NARUC – MA)     |
| 3. Hank Hultquist/Cyd Anglin          | AT&T Inc.                         |
| 4. Greg Rogers                        | Bandwidth.com, Inc.               |
| 5. Mary Retka                         | CenturyLink                       |
| 6. Valerie R. Cardwell                | Comcast Corporation               |
| 7. Karen Reidy                        | CompTel                           |
| 8. Jose Jimenez/Beth O’Donnell        | Cox Communications, Inc.          |
| 9. Michael Altschul                   | CTIA                              |
| 10. David Greenhaus                   | 800 Response Information Services |
| 11. Hon. Paul Kjellander/Carolee Hall | NARUC – Idaho                     |
| 12. Michael Balch                     | NARUC – Iowa                      |
| 13. Hon. G. O’Neal Hamilton           | NARUC - South Carolina            |
| 14. Wayne Jortner                     | NASUCA                            |
| 15. Tom Dixon                         | NASUCA                            |
| 16. Jerome Candelaria/Betty Sanders   | NCTA                              |
| 17. Stephen F. Pastorkovich           | NTCA - The Rural Broadband Assn.  |
| 18. Gina Perini/JT Ambrosi            | SMS/800, Inc.                     |
| 19. Rosemary Emmer                    | Sprint                            |
| 20. Michelle Thomas                   | T-Mobile USA, Inc.                |
| 21. Thomas Soroka, Jr.                | USTA                              |
| 22. Kevin Green                       | Verizon                           |
| 23. Brendan Kasper                    | Vonage                            |
| 24. Tiki Gaugler                      | XO Communications                 |

Special Members (Non-voting):

- |                |                 |
|----------------|-----------------|
| John Manning   | NANPA           |
| Amy Putnam     | PA              |
| Faith Marcotte | Welch & Company |

Jean-Paul Emard

ATIS

Commission Employees:

Ann Stevens, Deputy Chief, Competition Policy Division

Sanford Williams, Competition Policy Division

Michelle Sclater, Competition Policy Division

Carmell Weathers, Competition Policy Division

**III. Estimate of Public Attendance.** Approximately 20 members of the public attended the meeting as observers.

**IV. Documents Introduced.**

- (1) Agenda
- (2) NANC Meeting Transcript – June 20, 2013
- (3) North American Numbering Plan Administration (NANPA) Report to the NANC
- (4) National Thousands Block Pooling Administrator (PA) Report to the NANC
- (5) Numbering Oversight Working Group (NOWG) Report
- (6) Billing and Collection Agent Report
- (7) Billing and Collection Working Group (B&C WG) Report to the NANC
- (8) North American Portability Management (NAPM) LLC Report to the NANC
- (9) Local Number Portability Administration Working Group (LNPA WG) Status Report to the NANC
- (10) LNPA Working Group
- (11) Industry Numbering Committee (INC) Report to the NANC
- (12) Future of Numbering (FoN) Working Group Report to the NANC
- (13) Recommendations to the NANC
- (14) Updating the Training Manual
- (15) Robo Calls and Caller ID Spoofing

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## **VI. Summary of the Meeting**

CHAIRMAN KANE: For the record it is Wednesday, September 18, 2013, and we are starting at 10:06 a.m. in the meeting room at the Federal Communications Commission, 445 12<sup>th</sup> Street, S.W.

We are going to start with the roll call. I am Betty Ann Kane, the Chairman of the North American Numbering Council. We will go around this way. I think there is also a sign-in sheet that's going around and we will also ask if there are any people on the phone. We will open the bridge.

MR. DIXON: Tom Dixon from the Colorado Office of Consumer Counsel, a NASUCA representative.

CHAIRMAN KANE: Welcome.

MR. LANCASTER: Mark Lancaster, AT&T, FON Tri-Chair.

CHAIRMAN KANE: Thank you, Mark.

MS. HYMAN: Linda Hyman, Neustar Pooling.

CHAIRMAN KANE: Thank you, Linda.

MR. CARPENTER: Jay Carpenter, 1-800 ASTA. I'm the FON participant.

CHAIRMAN KANE: Thank you, Jay.

MS. PENN: Jennifer Penn, T-Mobile, INC participant.

CHAIRMAN KANE: Thank you, Jennifer.

MS. WELCH: Heather Welch, 800 Response.

CHAIRMAN KANE: Thank you, Heather.

MR. PASTORKOVICH: Steve Pastorkovich, NTCA.

CHAIRMAN KANE: Thank you, Steve.

MR. BALCH: Mike Balch, Iowa Utilities support staff.

## **ANNOUNCEMENT AND RECENT NEWS**

CHAIRMAN KANE: Thank you, Mike. And Commissioner Kjellander is here. Anyone else? That seems a little more normal now that we've got everybody there.

Okay, those of you on the phone, what we have gone through were some announcements welcoming three new members, two new members, and welcoming one back. And then two additions to the agenda after Item 12, one a report from Rosemary Emmer and Mary Retka on some potential working groups following up on the presentation that Henning Schulzrinne gave us in February, and secondly an update on the training manual which is being revised also by Rosemary. And those two have been added to the agenda after Item 12.

## **APPROVAL OF TRANSCRIPT**

And we had just looked at the transcript. If anyone has any additions or changes in the transcript or clarifications please get those to Carmell Weathers.

And I'll also ask the folks on the phone, although we are recording what you say in introducing yourself, if you would also send in an e-mail to Carmell letting her know for the record that you were here. We do have a written sign-in sheet that's going around but if we can get that from you by e-mail just to be sure we've caught everybody up for the record.

## **REPORT OF THE NORTH AMERICAN NUMBERING PLAN**

### **ADMINISTRATOR (NANPA)**

And we had just started on the report, Item 3, the North American Numbering Plan Administrator report, and John Manning had just started that. John, I'm going to ask you if you don't mind to sort of start again.

MR. MANNING: Absolutely, no problem. Okay, we'll start at the beginning of the report where we talk about activities with regard to area code assignments.

Two area codes have been assigned in 2013, the Texas 346 in relief of the 281,713,832 area code complex. That area code was assigned in April of this year. And since our last meeting, Indiana 930 area code was assigned in relief of the 812 area code. That took place on July 31st.

With regard to area codes going into service in 2013, since our last meeting the only change has been the area code 737 in Texas. It went into service on July 1, 2013. That is an overlay of the 512 area code in the Austin, Texas area.

There's one area code with a future 2013 in service date and that is NPA 272 to overlay the Pennsylvania 570 area code with a planned in service of October 21st.

Also with regard 2013 reservations, there have been none to date however I did make note of the fact that there are four area codes that INC has pending before it that will move to reserve for non-geographic purposes. There is an INC issue that is going to go to resolution later this month and with that those four area codes will move to the non-geographic purposes. There will be more on that when the INC presentation comes up later in the agenda.

With regard to CO code activity for the first eight months of 2013, we have assigned 1,920 central office codes which is a little bit higher than in 2012 but roughly about the same in 2011 and 2010.

Net assignments so far this year are around 1,700 codes which is somewhat higher than the previous years. As I previously mentioned this is due to the fact that in both 2012 and 2011, we did have a fairly high quantity of code returns due to the fact that two separate service providers did return large quantities of codes.

For the year we are projecting that somewhere around 2,900 codes will be assigned which again is higher than in 2012 but somewhat more in line with 2011 and 2010 activity.

MALE SPEAKER: I'm sorry, (unintelligible) we're getting static again.

CHAIRMAN KANE: The folks on the phone, be sure that your own phone, whether it's your cell phone or your office phone that you're listening on is on mute so we don't pick up any static. We do tend to pick those up from cell phones (unintelligible). Thank you.

MR. MANNING: With regard to carrier identification codes, there are two types. There is the Feature Group B and the Feature Group D. For Feature Group B there have been no assignments in 2013 and five codes have been returned so far. As of August 31st, 265 codes are assigned in total for the Feature Group B carrier identification codes.

There is always more activity on the Feature Group D side. We have

assigned 24 codes this year, 38 Feature Group D codes have been returned so far this year, and as of the end of August we had a little over 2,000 assigned Feature Group D kicks and over 7,700 CICs available for assignment.

The 5YY area code resource, since the beginning of this year we've assigned 188 5YY codes. At the same time we've had two codes returned or reclaimed. As of the end of August there's 2,855 codes assigned in total, 309 available for assignment.

With regard to the 900 resource, no assignments and no returns and to date we have 101 codes assigned.

With regard to the 555 resource, again there's been no activity with this resource since the beginning of the year.

With regard to 800-855 which is used for the purpose of accessing public services on the PSTN intended for the deaf and hard of hearing, NANPA has assigned one of those codes in 2013.

With regard to 456 used for international in bound service, two 456 NXX codes have been returned to NANPA in 2013. There are just a handful of these codes assigned so this resource itself does not have a lot of codes to begin with that are currently assigned.

And finally for vertical service codes, automatic number identification digits and N11 codes, there has been no assignment activity since the beginning of this year.



Moving on to area code relief planning, there are four area codes that are projected to exhaust within the next 12 months. I have already mentioned the area code 570 in Pennsylvania. They are already in permissive dialing. Mandatory dialing will take place on September 21st with the effective date being October 21st.

In Kentucky 270 there will be an overlay of the 364 area code. Ten digit permissive dialing started on August 3rd. Mandatory dialing will be February 1, 2014, with an effective date of March 3, 2014 for the 364 area code.

In Nevada 702, we will see the overlay of the 725. Permissive dialing also started on August 3rd of this year. Mandatory 10 digit dialing will not begin until May 3, 2014. The effective date of the new 725 will be June 3, 2014.

And also previously mentioned, the 346 area code which will be part of the Houston complex there, the effective date of this new area code will be July 1, 2014.

Touching upon other relief activities, in Connecticut 860 a decision dating back as far back as 1999 and that is not a typo, it is 1999, Connecticut Public Utilities Regulatory Authority ordered the 959 overlay of the existing 860. It just simply has not been implemented because the need was not there for the new area code. That is changing and we're moving forward with the implementation of that area code.

At the time that the Connecticut Commission ordered the overlay and implementation of the 203/475 area code they ordered 10 digit dialing in 860 so when it comes to the implementation of this area code it is essentially just moving

forward with an effective date for the area code which is August 30, 2014.

I mentioned Indiana, some specifics on that, permissive ten digit dialing of the new 930 area code is scheduled to begin March 1, 2014, mandatory dialing is scheduled for September 6, 2014, and the effective date of the new 930 area code will be October 6, 2014.

In California 415 which happens to be the San Francisco area, the Public Utilities Commission, we are waiting a decision from them with regard to the type of relief that will be implemented. We are expecting the CPUC to have a decision by the end of this year.

South Carolina 843, March 21st, NANPA conducted a relief planning meeting and NANPA has filed a petition on behalf of the industry on May 31st of this year recommending an overlay of the 843 area code and just recently a hearing was scheduled to take place in early December as they begin the process of reviewing that recommendation.

Ohio 740, on March 12, 2013, we revised the exhaust projection for the 740 NPA. The new exhaust is 2Q15. On May 1st we conducted a relief planning meeting and the industry has recommended an overlay and we expect to file that petition this month.

In North Carolina 336, again we had a relief planning activity that had already been completed in this area. We met with the North Carolina Utilities Commission to give them an update on the status of the 336 NPA and as I

mentioned the relief plan had previously been filed. We have updated the lives associated with that plan for all of the alternatives included and that was done on July 19th of this year.

And finally in New Jersey 609 and 856, on September 26th we will conduct a meeting to discuss the elimination codes protected for the dialing of seven digits across the 609/856 NPA border and the possibility of initiating relief of the 609 area code.

One more item I'll just cover briefly, with regard to the toll free resource there was decision to move forward with the implementation of the toll free area code and based upon direction provided by the Commission the 844 toll free NPA is to be opened on December 7, 2013, and if you want to see all the correspondence associated with all of this activity you can certainly visit the NANPA website and I've given the URL. NANPA did publish a planning letter on August 5th relaying this information to the industry.

Any questions with regard to relief planning or CO code or all other resources I've covered so far?

CHAIRMAN KANE: Any questions from the people on the phone?

MR. MANNING: The final two items, number one is the NANPA change orders. We have one change order outstanding. This is the INC issue 692 and 702, both dealing with changes with regard to the 5YY NPA and the use and the service definition that the particular resource will be used for.

We have scheduled implementation of this change order on September 27th with these changes. NANPA will be providing information to the industry on the changes in the system as well as notification that the use of this particular resource has been changed and providing that new definition that the INC has come up with, with this resource as part of that education material.

The VOIP trial, as of September 13th of this year NANPA has assigned 16 central office codes as part of the VOIP trial. All trial participants have requested and received at least one central office code. Each of these assignments was in response for the need for a location routing number or LRN. The majority of these assignments have effective dates this month, in September. Assignment information can be found on the NANPA website under our central office code utilized code report.

It should be noted that Neustar has kept the FCC up to date on trial activities and has worked very closely with the VOIP trial participants to insure complete understanding of their roles and responsibilities as a NANP resource assignee.

Any questions on either the change order or the trial?

CHAIRMAN KANE: Any questions on the phone? Jose. State your name, please.

MR. JIMENEZ: Oh, I'm sorry.

CHAIRMAN KANE: That's okay.

MR. JIMENEZ: See, I forgot. That's what happens when you're out for a

couple of years.

**(LAUGHTER)**

MR. JIMENEZ: Jose Jimenez, with Cox Communications. I'm curious about the nature of the information you have shared with the FCC about the trials.

MR. MANNING: Certainly. It's been basically information about the activity of the individual trial participants, any ongoing activities, discussions we've had with them of course, and the applications filed and the activity associated with those applications insuring that they are consistent with the trial proposals that they put together, and any issues that may have come up during that whether it has been on the education part, any questions that we may have had with regard to responding to these applications, things along those lines, making sure that the FCC was informed of all of those activities.

MR. JIMENEZ: Have there been any issues?

MR. MANNING: From a NANPA perspective, and I'll let the pooling administration answer that, I would summarize the issues basically as the similar type issues you have with any new player entering into the market and needing to have an understanding with regard to the process for applying for and receiving NANP resources.

We have found over time that they need a significant amount of, I don't want to call it hand holding but guidance in helping them understand the guidelines, where they can get information. When they start the process there may be particular

pieces of information that they are missing and we helped with that.

So from that perspective there has certainly been a good bit of that from a NANPA perspective but I would say it's on par with what we've done with other local exchange carriers, wireless industry who have the new players that are in the market.

MR. JIMENEZ: But nothing that has affected the trials themselves?

MR. MANNING: From a number administration perspective I think we have been able to process applications, get them the resource, and effectively meet the time intervals that they wanted to have based upon what they had requested in their applications.

MR. JIMENEZ: Thank you.

CHAIRMAN KANE: Other questions? Thank you. On the issue of the IP numbering trials just for your information there will be panel at the MR. KAGELE meeting in Orlando on the trials and related issues with an update that I will actually be moderating and some of you may be called to be on that panel.

MR. MANNING: Just a final item on page six of the presentation, just letting you know we have our quarterly newsletter that will be coming out and part of that newsletter will include information about change order number one, another vehicle we use to help educate the industry about changes such as these.

And we will be conducting our semi-annual NPA and NANP exhaust forecast. That information will be available at the end of October and will be

published on the NANPA website and appropriate notification sent out to the industry.

The final page of my presentation I do not cover. It is just a quick report on all those area codes projected to exhaust in the next 36 months, information about that. And as I noted before this is now a report on the NANPA website if you desire to see this information up-to-date, at any time you can visit the website under reports, area code relief planning. That concludes my report.

## **REPORT OF THE NATIONAL THOUSANDS BLOCK POOLING**

### **ADMINISTRATOR (PA)**

CHAIRMAN KANE: Thank you very much, John. We will move on to Item 4, which is the report of the National Thousands Block Pooling Administrator.

I am going to turn the meeting over to Commissioner Why. Thank you.

MS. PUTNAM: I'm Amy Putnam. I'm the Director of National Thousands Block Pooling Administration and pooling is fine.

Not only is pooling fine but because as Sanford mentioned the contract was renewed, you're going to get to hear me say that for another four years.

On the first page of our presentation, summary data September 2012 through August 2013, I draw your attention to the total applications in June and also the number of change requests to existing blocks in June which are correspondingly large because of some carrier network modifications. The other figure on that chart that is somewhat anomalous is in August we had a large number of block requests

denied and we went and checked that and that was random across a number of carriers.

With respect to the second piece, p-ani summary data, you'll notice that the August total applications process figure is large and that corresponds on the next page to the number of p-ani returns. Again, those figures are related to network modifications.

Next two sections, Part Three summary data, but those are rolling 12 month totals as is the report of NXX codes opened and the summary of rate center information changes. August was a slow month. Cecilia didn't mind that.

Reclamation summary is pretty consistent, a little bit larger than usual but nothing extraordinary. The system was up for the whole time since our last meeting, both systems.

Other pooling related activities, contract renewal was base year plus three as Sanford indicated ending July 14, 2017.

All of our contractual reporting requirements for the last 12 months have been submitted on time and posted to the website as required.

Regulatory, we had one delegated authority petition that is still on our radar, that was from Montana. The Montana Commission issued an order on August 13th to implement the delegated authority and we sent out notices on August 21st alerting everyone of the SIM, the Supplemental Implementation Meeting that is scheduled for this week.



P-ani administration, in addition to processing the applications, we're getting toward the end of working on reconciling the p-ani data.

I've reported on this since we went live where there are three general areas where the data has been a problem for us and we have had to go to carriers and work out the issues where the same p-ani range or part of a range is being reported by more than one carrier, where no assignee reported on a range, and assignor reported as assigned, or where there are duplicate assignment issues.

I attended the ESAF meeting in San Diego on July 24th to 25th as part of p-ani administration. With respect to the NOWG we participated in our regular monthly meetings.

We have submitted no change order proposals since the last NANC meeting. Change order 24 from the last contract which you may recall was a no cost change order, we completed part of that, implementing part of it on July 19th and the remainder will be rolled into the system upgrade schedule for the coming year.

Special projects, we concluded the most recent very old overdue Part Four project when the last alternative Part Four was approved on September 3rd.

With respect to the VOIP trial we processed requests for 16 LRNs and for each of those one block was retained and nine blocks were returned to the pool, and we processed requests for five individual blocks.

The annual PA survey, this is not the survey that NOWG does under the auspices of the NANC but an internal survey that we do. We received 73 responses,

19 of which were from state regulators and the overall average response was 4.6 out of 5 which is consistent with previous years.

Although it is not on here, as a special project because it's part of the contract we have been very busy writing requirements for the system upgrade and enhancements and submitting the various contractually required plans that needed to be submitted within the first few months of the award of the contract, our security plan, our system acceptance plan, the disaster recovery business continuity plan, documentation plan, management reporting plan, and statistical forecasting plan, and we are glad to have gotten all of those filed.

That's it for today. Questions?

MR. CANDELARIA: Jerome Candelaria, NCTA. Thank you for the report. I did want to know about the nature of these carrier network modifications that affect pooling. What type of modifications are we talking about?

MS. PUTNAM: Well, sometimes if carriers are closing down certain parts of their network, moving blocks, they do block modifications and those modifications will show up as Part Threes and depending on how networks might be consolidated there may be duplicate p-ani's that they do not need anymore and so they will return some p-ani's to us for future use.

MR. CANDELARIA: Thanks.

COMMISSIONER WHY: Are there any questions on the phone? Hearing none, thank you Amy.

MS. PUTNAM: Thank you, Commissioner.

**REPORT OF THE NUMBERING OVERSIGHT WORKING GROUP**

**(NOWG)**

COMMISSIONER WHY: Item 5 is the report of the Numbering Oversight Working Group.

MS. DALTON: Good morning. I'm Laura Dalton from Verizon and I'm one of the co-chairs of the Numbering Oversight Working Group which is the NOWG, along with Karen Riepenkroger from Sprint.

Slide two consists of the contents of our report. The main topics that I will be discussing on the following slides are the NOWG monthly activities, the 2013 annual performance surveys for the Numbering Administrators, the NANPA and PA change orders, followed by the NOWGs recent co-chair election, and finally the last few slides contain a list of the NOWG participating companies and a schedule of our upcoming meetings.

Turning to slide three, NOWG activities, the NOWGs primary role is to oversee the operations and review the performance of the two numbering administrators, the NANPA and the Pooling Administrator, the PA. The oversight of the PA includes monitoring the activities of the RNA which is the routing number administrator. The RNA is a separate unit within the PA that is responsible for administering p-ani's.

The NOWGs functions include holding separate monthly conference calls with the NANPA and the PA to review their activities. Following our monthly calls with the two numbering administrators, the NOWG holds NOWG only calls to discuss any issues that may require follow-up.

During our most recent monthly call last Monday the NOWG began discussing the 2013 performance surveys. We are beginning to gear up for our annual performance evaluation process.

Turning to slide four, the NOWG has begun its review and update of the NANPA, PA, and RNA performance survey questions. Last years survey forms were updated to reflect new dates and the survey questions are being reviewed to see if any questions need to be changed or added to better reflect the 2013 administrator activity. The 2013 draft survey forms were sent to the NANPA and the PA for their input on whether they have any changes to suggest for the new year.

We don't anticipate a major overall of any of the survey questions. We try to keep the changes to a minimum so that we can better compare year over year responses but one different area that we're looking at for 2013 surveys pertains to the VOIP numbering trial and we are considering what would be the best way to give the VOIP trial participants an opportunity to provide feedback on the performance of the NANPA and the PA.

Since the VOIP trial has involved additional work for the numbering administrators, the NOWG recognizes that this work effort needs to be reflected in

the NANPA and the PA's 2013 performance reports.

We would like to hear directly from the VOIP trial participants regarding the performance of the NANPA and the PA so the NOWG has discussed various options for obtaining their input.

The NOWG plans to further discuss this issue and by next month we will decide on the best option. After we have completed our updates to the survey questions the NOWG will send the 2013 draft survey forms to the NANC for review and we will request approval of the surveys at the December NANC meeting.

Moving on the slides five and six, these slides show outstanding NANPA and PA change orders. Whenever the NANPA and the PA submit a change order proposal to the FCC the NOWG reviews the change order and prepares a summary and recommendation. Since the last NANC meeting June no new change orders have been submitted.

The change orders noted on slides five and six were submitted in 2012 but are being implemented in 2013. NANPA change order number one is summarized on slide five and was mentioned earlier by John Manning. This change order is the proposed solution to implement INC Issue 692 to update the 5YY requirements for resources, and INC Issue 702 to update the service description for use of 5YY resources.

This change order significantly modifies the NANP administration system NAS, functionality applied to the non-geographic 5XX, NXX resources to model

the functionality available for central office codes from geographic area codes. The implementation of part of this change order is targeted for September 27th and additional functionality will be implemented in NAS in the November timeframe.

Summarized on slide six and mentioned earlier by Amy Putnam, is the pooling administrator's change order number 24. This change order was partially implemented in July to add functionality to enhance the file transfer protocol or FTP interface with the pooling administration system.

Turning to slide seven, co-chair position, the term of one NOWG co-chair position was due to expire at the end of 2013. The NOWG co-chairs serve two year terms and elections are held annually on a rotational basis.

In early September the NOWG had requested nominations for one of the co-chair positions. I'm pleased to announce that Karen Riepenkroger from Sprint was nominated and was reelected by acclamation to continue her current role for 2014 and 2015.

Slide eight shows a list of NOWG participating companies. As you can see, we currently have representatives from eight service providers and two state regulatory commissions who actively participate in the NOWG.

Slide nine shows the NOWGs upcoming meeting schedule for our regular monthly meetings with the NANPA and the PA. As I mentioned earlier we also hold NOWG only calls immediately following the calls with the administrators. In addition to the monthly calls mentioned here we hold other NOWG meetings that

we schedule when needed especially during the time when we are preparing the administrators performance reports.

The last slide, slide ten shows contact information for the NOWG co-chairs. We're always open to new participants so anyone who is interested in joining the NOWG should feel free to contact either me or Karen Riepengroger. Thanks you. Are there any questions?

COMMISSIONER WHY: I see no questions in the room. Are there any questions on the phone? Hearing none, thank you, Laura.

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

Our next report is Item six, the report of the North American Numbering Plan, Billing and Collection Agent.

MS. MARCOTTE: Good morning. I'm Faith Marcott from Welch LLP and we are the Billing and Collection Agent.

If we turn to page one of our report, it is a statement of the financial position of the Fund. At August 31st there was \$3.2 million in the bank, net receivables of \$324,000, and invoices to be paid out that have not yet been paid by the end of August of \$494,000. That leaves the Fund with \$3,060,000 at the end of August.

If we turn to page two of our report it is a forecast of the Fund for this funding year up to June 2013. The total column, if you look to the right it shows that we are now anticipating the Fund will have \$307,000 at the end of this funding

year which is June 14th. The budget, we were anticipating \$1,250,000 and so the bottom right hand corner shows where the differences were, it's a summary, the main item being the pooling contract.

It came in for the services already being provided, it was \$295,000 more than we had budgeted for and then there's an additional amount for automated systems development. This amount is being paid \$75,000 over 18 months which helps us in not going over and turning into a deficit because that's being prolonged over 18 months. So those two items add up to a \$1,195,000. This is partially offset by the fact that the billings were a little bit higher than we had budgeted just due to different revenue numbers than we had anticipated.

If you turn to the next page it just shows a summary of what anticipated amounts that are going to be paid out over the next six months.

And then the final page just talks about the services we do on a regular basis, sending out the monthly invoices and processing payments, updating the red light report.

There have been a lot of calls since the invoices went out in June to be paid in July and we have been sorting out through a lot of calls, people wondering who we are and why we're sending them an invoice.

And as mentioned earlier we are still in the midst of our contract and the renewal is in process.

COMMISSIONER WHY: Thank you. Any questions? Yes, Jose.



MR. JIMENEZ: You know, I am Mr. Question. Jose Jimenez with Cox. Just curious about one item. I'm an electrical engineer by education anyway and so patterns, I noticed a pattern of an increase in September of 2013 on both the NANP administration on the long spreadsheet and then on the following page. What's behind that?

MS. MARCOTTE: That's the previously mentioned change orders. We just put it in that month. We don't know when. We haven't received invoices yet but that's the anticipated increase and that was included in the budget when we prepared the budget. That's why there is no big variation.

MR. JIMENEZ: Got it. So that's just related to the 5YY change order and the other one?

MS. MARCOTTE: Yeah, the INC ones. I'm not familiar with the terminology but I mean other people here I think know.

MR. JIMENEZ: Okay. Are those are the change orders, the two that were just referenced?

MS. MARCOTTE: Yes.

MR. JIMENEZ: Okay, thank you.

COMMISSIONER WHY: Any other questions in the room? Questions on the phone? Seeing and hearing none, thank you very much.

**REPORT OF THE BILLING AND COLLECTION WORKING GROUP**

**(B&C WG)**

We have a break here but I think we're moving along very quickly so let's move to the report of the Billing and Collection Working Group and I see Rosemary heading up. I just want to make sure that this is Item 7. Thank you, Rosemary. Please identify yourself.

MS. EMMER: Thank you, Chairman. Rosemary Emmer with Sprint. The Billing and Collection Working Group, I chair this along with Tim Decker of Verizon who is here today.

We are responsible for overseeing the performance of the functional requirements provided by the B&C Agent. We manage their performance and we also manage the budget.

We're currently overseeing the billing and collections and the monthly evaluations of the deliverables which we always do but today I'm going to report on the red light rule process and on the B&C Agent contract.

So if you go to page four, the red light rule process was actually updated last year in 2012, so it's been implemented now for about a year. And one of the new components of this is that the B&C Agent does not send the overdue invoices anymore directly to the FCC like they used to do in the previous process. Now they provide it straight to the red light system directly and they do that on a daily basis.

So now instead of the FCC having to collect the funds and then send them to the Agent, the funds are collected directly by the agent. So the process is streamlined and it has been working well and I wanted to report on that.

But I also wanted to note to everyone that once a carrier gets on the red light program or whatever, their access to numbering resources is blocked so this new automated process means that a delay in providers processes for payment could put them in a red light process sooner.

So for the folks in the room who represent others, we wanted to highlight this to you just to let them know, you might want to reach out to them and let them know and if you have any question on this feel free to call Tim Decker with Verizon or myself.

Page five as far as the contract, I know Faith touched on it previously but the B&C Agent contract expired on October 1, 2009, and Welch has received an eight month interim contract which includes a two and a half month transition. But anyway the period was covered between April 1st and November 30, 2013, so I wanted to make you guys aware of that.

On page six we show the history of the contribution factor. Page seven our membership. And our next meeting is scheduled for October 22nd, it's a conference call. If you have any desire in joining our call we would welcome you so please feel free to e-mail myself or Tim Decker and our e-mails are located on page eight.

Mary.

MS. RETKA: I would direct this more to Sanford. I know in the initial statement you made at the beginning of the meeting you indicated something about this contract being looked at and could I just ask, it's been awhile since the contract

expired, what's the timing expectation? Can this continue to be extended forever or?

COMMISSIONER WHY: Mary, if you could just identify yourself.

MS. RETKA: I'm sorry, Mary Retka from Century Link.

SANFORD WILLIAMS: We're well aware the contract expired on November 30th. For those of you who don't know, what happened to the contract is that we in Bureau who work on numbering issues have no authority to approve contracts. It goes to our contracting office and it's with them right now and they assured me that it will be taken care by November 30th so we're proceeding with those assumptions. Obviously it's been awhile and it's beyond our control but we anticipate that by November 30th things will be in place.

COMMISSIONER WHY: Any other questions in the room? Jose?

**(LAUGHTER)**

MR. JIMENEZ: Well done.

**(LAUGHTER)**

COMMISSIONER WHY: Any questions on the phone? Hearing none, thank you, Rosemary.

MS. EMMER: Thank you.

## **REPORT OF THE NORTH AMERICAN PORTABILITY MANAGEMENT**

### **LLC (NAPM)**

COMMISSIONER WHY: Item number 8 is the report of the North American

Portability Management, LLC.

MR. KAGELE: Good morning Chairman Why, ladies and gentlemen. I think I know a good many of you in this room but for those that I do not know or who are unfamiliar with me allow me to introduce myself. My name is Tim Cagal. I work for Comcast. I'm here representing the NAPM LLC as an interim co-chair along with my colleague Tim Decker.

So I would like to give NAPM LLC report. Since we last met there was one CIGAR statement of work approved, SOW 91. This particular SOW supported member recommended changes to the NPAC user application to allow VOIP service provider as a service provider type. The change is necessary to allow the VOIP service providers direct access to NAPM numbering resources for participation in the FCC mandated VOIP trial.

And as a result of that all of the master services agreement in the seven NPAC regions required a slight modification to incorporate that new language. So that was the only SOW activity that took place since the last NANC meeting.

We've kind of covered the general piece and I would just add here as Chairman Kane announced this morning, please do keep Mel Clay in your thoughts and prayers.

And in terms of the FON PAC activity, the RFP process remains under a confidential non-disclosure. We have as a FON PAC initiated the best and final offer process on August 16th. The best and final offer response is due on the 18th

which is actually today and once that has been reviewed then the expectations is the FON PAC will be providing its vendor selection recommendation to the NANC SWG in accordance with the published scheduled timeline.

So that concludes my report. Are there any questions?

COMMISSIONER WHY: No questions in the room. Are there questions on the phone? Hearing none, thank you, Tim.

MR. CAGAL: Thank you.

COMMISSIONER WHY: I just indeed want to add my thoughts about Mel. I've worked with Mel quite a bit and he's a terrific colleague and a terrific friend and my thoughts and prayers go out to him and his family. Thank you.

### **REPORT OF THE LOCAL NUMBER PORTABILITY**

#### **ADMINISTRATION(LNPA) SELECTION WORKING GROUP (SWG)**

Item 9, the report of the Local Number Portability Administrator Selection Working Group, Tiki.

MS. GAUGLER: Tiki Gaugler with XO Communications. We don't have a written report. We have continued to have contact with the LLC and the FON PAC to oversee their activities.

As Tim mentioned there was a best and final offer that was issued on August 16th. The SWG approved that, had a conference call, approved the language for that, reviewed and approved it on August 14th, and we will just continue to monitor their activities going forward.

## **REPORT OF THE LNPA WORKING GROUP**

CHAIRMAN WHY: Thank you Tiki. Questions in the room? Questions on the phone? Seeing and hearing none we are moving on to Item 10, the report of the LNPA Working Group.

MS. JORDAN CAMPANOLI: Good morning, everybody. My name is Paula Jordan Campanoli and also on the bridge are the other two co-chairs of the LNPA Working Group which is Ron Stein and Linda Peterman.

So today we are going to cover the activities since the last NANC meeting of the LNPA Working Group. The first one is the first port notification process. We approved that change and also had made changes to the NANC flows and I've indicated on the report which flows were changed because of this first port notification process and the steps in the flows that were changed.

When I sent the report out I attached separately a red line version of the flows and a clean version of the flows and I have also imbedded them in the report but I was under the impression that some folks couldn't open the imbedded one so I sent separate attachments so hopefully everybody has those.

And I wasn't going to go through each one unless somebody has a question on the flows for the first port notification process.

Okay, the next one has to do with Best Practice 65 and what was going on or the reason for Best Practice 65 was we had some service providers that were sending a port request with a certain date and time on the port request and then once

they got the firm order confirmation they were actually advancing the activation of the port so that the old service provider was not aware that the port was instead of being activated on Tuesday, they were actually activating it on Monday. That's just an example.

So we made the change that in order for them to do that they do need to send this up so that the old service provider knows exactly and is in agreement with the change of the due date, the activation date.

And again on that one I've indicated the flows that were changed and the steps in the flows and those flows are the same flows that I spoke earlier that we sent imbedded and also attached copies of the flows.

Any questions on that?

Okay, the next item is Best Practice 30 which has to do with area code relief options. The LNPA Working Group approved Best Practice 30 on area code relief option and what we are recommending is that instead of doing splits that we do all services overlays when you have to do area code relief.

Due to the implementation of number portability the landscape has changed which makes implementing and area code splits more pragmatic for end users and so there is also an attachment that was sent both imbedded in the report and attached that speaks to the areas where the customers have problems with the difference between a split and an overlay and what the benefits of an all services overlay is.

I wasn't sure if everybody wanted me to go through all of the benefits or if



you had questions on the benefits. Has everybody had a chance to read them? So what we would ask is that the --

COMMISSIONER WHY: Hold on Paula. Jerome.

MR. CANDELARIA: I will have a question but I'll hold it. Please finish first.

MS. JORDAN CAMPANOLI: What the LNPA Working Group would like is for the NANC to support this Best Practice and also forward it to the FCC for their support on this Best Practice.

COMMISSIONER WHY: Jerome.

MR. CANDELARIA: Jerome Candelaria, NCTA. Thank you for the list. I noticed it is very similar to the list generated by INC and other industry representatives and forums, maybe 15 years ago at the beginning of number portability, so I'm wondering, we've heard from Neustar that states our choosing overlays in the vast majority of cases and I'm wondering if there is any specific circumstances that prompted this issue to be raised now. I suppose it seemed as though we have evolved to overlays being the solution of choice.

MS. JORDAN CAMPANOLI: That's what we're hoping for but there's always a chance that -- what we want the states and the in service providers and the community to understand is that there's a lot of difference since number portability -- when you implement a split that is not only pragmatic for the customer but it's also pragmatic for the industry as far as being able to do the work that needs

to be done with a split without any errors.

The last split we did was in 2007 in New Mexico and I can tell you this, that New Mexico will probably never do a split again because of the issues.

There is a massive amount of work that has to be done from a service provider perspective and it has to all be done at the same time. In other words, at the night of permissive dialing, every service provider in the nation has to make sure that if they're involved in the split, not only if they're involved in the split but if they have people that are going to be calling the area where the split is being done, that they have the indication of both the old and the new number format.

In other words at the night of permissive customers are able to dial either the number with the old area code or the number with the new area code. So you have to have that information in your network.

Every network element and every back office system has work that has to be done on the night of permissive dialing and it all has to be done that night. It cannot be done two weeks later or three days later, it has to all be done because when the customers place the call either using the old or the new service area code they need to be able to route the calls correctly.

The other thing that happens is if Caller ID, if you haven't changed your phone with a new area code and you get a call from somebody that when the call comes to you it has the new area code on it, in some of the cases we ran into, people weren't answering those calls because they didn't know who they were. They

didn't recognize the phone number, they didn't realize that the area code was changed. There are masses amount of errors that could occur.

One other area that we were made well aware was that the missing, abused and abducted children, and what happened was people in some cases who have children that either ran away from home or were kidnapped, whatever, the instance that we were made aware of, this particular woman said that her child calls her once a year on Mother's Day and because they had changed the area code the child didn't know about the area code, that child was probably never going to be able to get a hold of his parents again.

So there's personal things that happen on an area code split and there's electrical or network element events that happen so the easiest and the best way for everybody including the customers and that's what we're concerned of most, is do an overlay. The only thing that they have to do that they didn't have to do with a split is dial 10 digits and they seem to be able as you can see -- they are able to dial 10 digits very easily.

And I can tell you in all the area code reliefs that I've been involved with that involve an overlay, in all the time we've had basically four trouble reports listed in all of them and so that's a whole lot different than thousands of them that we received in the last split that we did.

COMMISSIONER WHY: Anymore questions on the floor in the room? Questions from the phone? Hearing and seeing none thank you, Paula.

MS. JORDAN CAMPANOLI: So we would ask if the NANC would support this Best Practice 30 and move it forward to the FCC.

COMMISSIONER WHY: So that will be an action item, Best Practice 30.

MS. JORDAN CAMPANOLI: Okay, and then the last one is the NANC 372, that's the development of the new NPAC interfaces and we are going to continue to work on that and finalize those requirements. That's it. I don't have anything else unless you have any questions.

KEVIN GREEN: (Off microphone, unintelligible) -- Verizon. Is this a votable item now or is it for the next meeting or exactly what is the process?

MS. JORDAN CAMPANOLI: The Best Practice 30?

MALE SPEAKER: Yes.

MS. JORDAN CAMPANOLI: We would like it to be voted on now but if it has to wait until the next meeting we're fine with that also.

MALE SPEAKER: And just for the record Verizon supports this Best Practice.

MS. JORDAN CAMPANOLI: Thank you.

COMMISSIONER WHY: I think we will take it for a vote at the end during the summary of the action items. So we will deal with it today, okay?

MS. JORDAN CAMPANOLI: All right. Any other questions? Thank you.

**STATUS OF INDUSTRY NUMBERING COMMITTEE (INC) ACTIVITIES**

COMMISSIONER WHY: So no other questions, great. Agenda Item 11 is the status of Industry Numbering Committee activities.

MS. ADAMS: Good morning. My name is Dyan Adams. I work for Verizon Communications. I am the co-chair of the Industry Numbering Committee along with Shaunna Forshee from Sprint who I believe is on the bridge.

As you know the Industry Numbering Committee provides an open forum to address and resolve industry wide issues associated with planning administration, allocation assignment, and use of North American Numbering Plan numbering resources with the NANP area.

Since the last NANC meeting in June, INC has held one virtual meeting in July and one face-to-face meeting last month. Our next face-to-face meeting is in October. And we have provided our normal membership information.

I'm going to be reporting on four issues today. The first one is Issue 740, titled Allow Pooled NXXs with ports to be returned via PAS when there are blocks assigned to other service providers.

Originally when we put this issue in the presentation the issue was at initial closure. It has recently been put back into active status because it was found that further edits are needed to the guidelines.

To facilitate the return of pooled NXXs in a process that is efficient and consistent for service providers, INC agreed to allow a code holder to return a

pooled NXX code when the code holder has ported TNs but no blocks and blocks are assigned to other service providers. I'm not going to go into anymore detail on the slide in case things change when we work this issue again.

Slide five, Issue 748 which we reported on at the last meeting, Assess Impacts on Numbering Resources and Numbering Administration with Transition from Public Switch Telephone Network (PSTN) to IP.

Since the last report on this issue, INC discussed that during the convergence to IP there is a need to maintain existing infrastructures and numbering databases while also coming up with modifications or new systems in databases.

ATIS filed comments to Docket 13-5, Technology Transitions Policy Task Force Seeks Comment on Potential Trials, identifying INC Guidelines which need to be considered and followed in the VoIP trial in order to insure that the migration to IP takes into account current systems and processes.

We also discussed the proposed concept of a Just In Time, JIT numbering trial where service providers and VoIP providers could obtain numbers at less than thousands block level using local number portability. Some discussion points were developing requirements for a JIT type numbering process assignment and provisioning timelines, establishment and replenishment of such number pool, NRUF and forecasting reports, and auditing.

INC is developing potential guidelines which could be used in the event that the JIT numbering concept is approved for trial.

We also reviewed recent developments in the VoIP direct access to numbering trial to assess the timeline of the trial and any impacts to INC guidelines and essentially if I recall, we looked at Vonage's first report.

Next slide, Issue 758, which John mentioned previously, Move the 550,535,536,546, and 558 and PAs from the General Purpose Category to Set Aside for Future Non-geographic 5XX and XX use.

Back in May of 2011, INC agreed to direct NANPA to set aside the 52X, 53X, 54X and 55X series for future non-geographic use. At that time the 550 NPA was not available because it had been reserved to relieve a geographic NPA exhausting within ten years but subsequently it became available.

So under Issue 758 we agreed to also set aside the 550,535,546, and 558 for future non-geographic use. We originally wanted to set aside the 536 NPA but NANPA subsequently determined that it was the only option for relief for a specific geographic NPA because all 187 other available NPAs would result in the need for implementation of timing delays in carrier networks.

Although NPA overlays generally allow the most efficient use of resources, the complexity involved in determining relief NPAs to prevent the need to implement such timing delays highlights how cross boundary seven digit dialing for protected routes can negatively impact that efficiency.

Even though the introduction of an overlay requires ten digit dialing for calls originating in the overlay it does not necessarily mean incoming calls are dialed on a

ten digit basis due to the use of these protected routes permitting seven digit dialing across NPAs.

Essentially protected routes limited the availability of CO codes in relevant geography for NPA relief hastening NPA exhaust. The practice of permitting seven digit dialing into another NPA may continue unless regulatory action is taken directing all calls into and out of NPAs be on a ten digit or a 1+ ten digit basis.

Slide eight, Issue 760, titled Add Clarifications to NPA Relief Planning Guidelines for Interested Party Terms and for Determining Consensus, I just want to confirm there was no process change here. It really was to clarify the guidelines.

The NPA relief planning guidelines include some terms that seem related such as affected parties, members of the industry, industry participants, and interested groups. INC edited the guidelines to clarify that only affected parties have a voice considered by NANPA when determining consensus.

Affected parties are considered a service provider with resources assigned in the affected NPA and/or a service provider with no resources assigned yet but authorized to provide service in the affected NPA.

INC modified the definition of consensus to specify a service provider consultant participating on behalf of a particular service provider shall identify the service provider it is representing as an affected party and have a voice in the consensus determination, and those participating that are not affected parties may express views but do not have a voice in the consensus determination.



MALE SPEAKER: I had a question on slide seven if I could go back to that. And it's just for my own edification about what a protected route is defined to be.

MS. ADAMS: A protected route is where the rate center allows seven digit dialing between more than one rate center and even if an overlay is ordered that is separate and distinct so the seven digit dialing is still allowed. Mary.

MS. RETKA: Mary Retka from Century Link. You might have this in the case of a switch that serves more than one state, a border type thing or a border across a rate center.

MALE SPEAKER: If we have local calling, inter-state local calling, is this sort of the example?

MS. ADAMS: I didn't want to call any area out in particular.

MALE SPEAKER: Okay, it was a new one on me and I did not I guess perceive that -- is that a significant issue when it comes to the contemplation of ten digit dialing nationally?

MS. ADAMS: Yes, it is. From what I understand protected routes exist in almost every state in the nation and in this particular instance if you look at the fact that there were 187 other NPAs and in this particular geography due to the existence of these protected routes, only one NPA was available to be assigned there that would not cause carriers to have to implement timing delays.

MALE SPEAKER: Okay, thank you.

MS. ADAMS: You're welcome. Slide nine, issues in initial pending, you've heard these before from John and also from the NOWG.

Issue 692, Update the 5YY Requirements for Resources, NANPA change order 1, implementation expected on September 27th. Issue 702, Update Service Description for Use of 5YY Resources, NANPA change order 1, implementation expected on September 27th, same change order.

If I recall, INC has reported on these issues before so I apologize for not providing more detail. It occurred to me that we talked about it a lot today. I know that we've reported on them before and I'm sure that information is available on our site.

Issues in initial closure, one edit is that Issue 740 is no longer in initial closure as of yesterday. It is back in active status. Issue 758, Issue 760, and 761 are all in initial closure, and in final closure we have Issue 756.

And then our last slide as always, relevant INC web pages. That concludes INCs activities.

COMMISSIONER WHY: We have a few questions for you, Dyan. First with Jerome.

MR. CANDELARIA: Jerome Candelaria from NCTA. I wanted to bounce back to slide eight. As you look around you'll see a lot of associations at the table and I'm curious, under Issue 760, where do associations for purposes of affected parties and consensus, do you view them as service provider consultants or not

parties with a vote for purposes of consensus?

MS. ADAMS: I don't believe that they are considered in consensus. They would not be considered an affected party if they don't have resources or aren't representing a service provider that does have resources or is approved to obtain resources but can certainly participate and express views.

MR. CANDELARIA: Well, how about associations that represent members that do have resources or are seeking resources?

MS. ADAMS: I think that they would be considered a service provider consultant but I can take that back and get clarification and get back to you, if they fall under the definition of SPC.

MR. CANDELARIA: Thanks.

COMMISSIONER WHY: The next person we have a question from is Michelle.

MS. THOMAS: Michelle Thomas, T-Mobile. Dyan, I have a question on Issue 748. I know that INC is doing great work on evaluating a bunch of issues about the PSTN transition to IP along with the other working groups, several other working groups of the NANC. I was wondering if there is from the INCs perspective going to be an action item that would be anticipated for the NANC with regard to Issue 748.

MS. ADAMS: Do you mean an action item from INC to NANC?

MS. THOMAS: Yes.

MS. ADAMS: Not at this time.

MS THOMAS: And I wonder if in fact you do come up with a decision to bring something to the NANC has there been a discussion about any concern from INCs perspective that there may be a bias with respect to advancing one or are you going to be advancing multi-proposals with regard to the PSTN transition?

MS. ADAMS: I would say that INC is still in the discussion phases of all the concepts that are out there and really trying to get a handle on what all impacts there will be to the guidelines.

MS. THOMAS: So at this time you don't anticipate bringing anything to the NANC with regard to Issue 748?

MS. ADAMS: No, there's nothing on the table.

MS. THOMAS: Okay, thank you.

COMMISSIONER WHY: Jose.

MR. JIMENEZ: Surprise, surprise. Well, I'm going to first pickup on 748 and follow-up on Michelle's questions. It does say here that INC is developing guidelines so if those guidelines are not coming to NANC where would those guidelines go?

MS. ADAMS: INC operates under the auspices of ATIS not as a NANC Working group per se and the guidelines that we are developing are potential guidelines because the Just In Time numbering proposal was submitted to the FCC

so we're doing our best to be prepared to act if that trial is approved or ordered. So the guidelines themselves if they were finalized and published would be published under ATIS INC and I don't believe require approval from the NANC.

MR. JIMENEZ: I'm not saying that they do or don't, I'm just wondering. I mean do you send them to the FCC and say use these? What happens, I mean I'm just curious.

MS. ADAMS: When a new set of guidelines -- you know, I'm not really sure because I haven't had new guidelines published since I've been at the INC. The P-Ani Guidelines, they just got published Mary.

MS. RETKA: Mary Retka from Century Link. I think that at this point as Dyan said, everything is very embryonic Jose, and a proposal has come forward to the INC to look at and some work has been done on that proposal.

INC is open for all proposals from any party who wants to join ATIS and participate in INC to bring them forward and I think the important thing is that right now because the trials are underway, that INC took the action to look at some potential guidelines and then those would be updated in the normal ATIS guidelines should they reach consensus in the INC work.

And INC generally brings those types of things in to share with the NANC from a perspective of a readout of the issue at the NANC meetings. So I hope that helps you understand.

MR. JIMENEZ: It does help and I know that this is all very

(unintelligible) and I hear you say that and I hear that obviously this is something that we have an interest in, we all probably do collectively.

It's always interesting when a knowledgeable body like ATIS is developing something like a guideline and it is a guideline so it's not a requirement, but quickly something like that could become kind of a generally accepted practice and soon after that a regulation so I'm curious about how that evolution happens but I guess I look forward to further readouts on this topic. Very curious about the work that INC is doing around this area.

The other had to do with a follow-up to Jerome. I'm just curious about the definition of consensus on 760. Is that a definition of consensus for INC work only within this group?

MS. ADAMS: I believe it is.

MR. JIMENEZ: Because I understand that this body has also a consensus kind of definition of decision making so I want to understand what is the difference between what this is and what drives NANC on consensus.

MS. ADAMS: I don't know what details are of the differences between say NANCs consensus process but INCs consensus process follows ATIS operating procedures and if I recall correctly NANPAs consensus process is in line with that as well. I don't know the answer to the difference between this consensus process and what we've talked about here.

MR. JIMENEZ: But bottom line this speaks to how INC in its decision

making reaches consensus?

MS. ADAMS: This particular issue actually speaks to the consensus process during NPA relief meetings. Mary.

MS. RETKA: I might suggest that Rosemary is going to talk about the NANC binder, that for NANCs consensus you might check the binder and I think then you can do a comparison based on what you've got here. That might help.

MR. JIMENEZ: Sure, always looking to learn.

COMMISSIONER WHY: Okay, Rosemary.

MS. EMMER: Rosemary Emmer with Sprint. I think the underlying questions today are about policy and this has happened many times in the past where issues are submitted to one group or another group and especially issues that are submitted to the INC because it's membership driven.

So it sounds to me like there's just a lot of questions about policy and is the INC the right place to work this or are they at the point where it's just going to be requirements based or are there real policy decisions and certainly regulatory decisions tied to it. So I just wanted to make that statement. Thanks.

COMMISSIONER WHY: Thank you. Any other questions in the room? Questions on the phone? Seeing and hearing none, thank you, Dyan.

MS. ADAMS: Thanks.

**REPORT OF THE FUTURE OF NUMBERING WORKINGGROUP (FoN  
WG)**

COMMISSIONER WHY: Item 12 is a report of the Future of Numbering Working Group.

MS. ADDINGTON: Thank you, Chairman Why. This is Suzanne Addington. I'm with Sprint and I'm one of the tri-chairs with the Future of Numbering Working Group.

On page two, this is our mission and scope and our mission is to explore changes to the environment, the impact of marketplace, and our regulatory changes and innovations on telephone numbering.

Our scope is to investigate new telephone numbering assignment approaches and future telephone number assignment requirements. Also if necessary we analyze opportunities to determine the feasibility and benefit of each and report its findings to the NANC. We also analyze various topics that may be given to us from time to time by the NANC and/or the FCC.

Moving to page three, explains why I am here today. There was a change in the tri-chairs so due to changes in job assignments and career plans the previous tri-chairs suggested that it was an appropriate time for a change in the FON leadership.

An election was held in July and the current FON members selected to serve as tri-chairs were myself, Suzanne Addington with Sprint, Mark Lancaster with AT&T, and Kathleen Bakke with Wisconsin Public Service Commission.

We would like to take this opportunity to thank the previous co-chairs, Jim Constanza from Verizon, Adam Newman from Telecordia, and Don Gray from the



Nebraska PUC for their long tenure and good work.

We would also like to thank Beth O'Donnell for facilitating the election.

Going to page four, this provides the status of our recent activity. We designed the FON contribution form and it is in its final status and is posted on the NANC Chair website in the Future of Numbering section.

We have discussed several potential future work efforts for which contributions may eventually be submitted. These topics fell into one of two categories, either the PSTN transition or the FCC VOIP trial and comments. We are currently reviewing the status of the outstanding FON work items to determine if additional work is necessary before closure.

Moving to page five, this lists our membership and we have a wide variety of attendees ranging from service providers, state commissions, and vendors. We still welcome everyone to attend which takes us to page six.

We meet the first Wednesday of each month from noon to 1:30 p.m. eastern time and our next meeting is October 2nd so if anyone would like to be added to the distribution list and receive information it is an open membership. Just let us know. Our contact information is provided there and you can send an e-mail to any of us and we can add you to the list. Thank you.

COMMISSIONER WHY: Thank you, Suzanne. Any questions in the room? On the phone? Seeing and hearing none, thank you. And thank you to the new tri-chairs and thanks to the previous tri-chairs for their work.

**(SHORT BREAK)**

Observing the time for the next things that we have to do, maybe this is a good moment to take a very brief break, about a five minute break. We have two presentations by Rosemary coming up and then a presentation by Henning. So if we could take a five minute break right now, and then we will also have at that time a summary of our action items.

(Short Break)

COMMISSIONER WHY: If folks would come back to the room and take their seats. I think I need Betty Ann's gavel. Okay, the time is 11:58 a.m. according to the FCC clock and we will be resuming the meeting.

**RECOMMENDATIONS TO THE NANC**

Our next item is Item 13 and it's going to be presented by Mary Retka and it's going to be on the recommendations to NARUK, is that right, Mary?

MS. RETKA: No, it's the recommendation to the NANC.

COMMISSIONER WHY: The recommendations to the NANC, okay. Go ahead, Mary.

MS. RETKA: This is Mary Retka from Century Link. I worked on this with Rosemary Emmer from Sprint and this was an action item that we took at the last NANC meeting, the June, was it 20th meeting, where in light of all of the good information that we had been provided in our February 21st meeting by Henning Schulzrinne, who is also nicely here for us to include in this discussion.

We had the dialogue at the meeting that there were a lot of questions around the room about the subject and where things might best be worked and what work needed to be done for this.

So Rosemary actually volunteered me and herself to work on this and take a look at the presentation that was also sent out to you in the meeting materials that Henning originally did on the 21st of February, and just kind of go through that and take a look at where there might be some proposed work group activity within the NANC groups. So that's what we did.

And you should all have a copy of this at the table and it is the high level recommendation and I would just say that we're open for any other thoughts on this and hopefully this will get a good dialogue amongst the group.

So if you will recall, when Henning came to us and made his presentation it was all very, very interesting material and everybody had a lot of discussion about it afterwards and since then.

And he was looking at the technology transition as we move to IP with numbering which as we're all aware of every transaction in the network starts with the key of the telephone number.

Every contact with our customers begins with what's your telephone number. Every repair in the network starts with what's your telephone number, sales activity, service activity all starts with telephone numbers so telephone numbers are deeply imbedded into all our systems and all our processes.

So we took a look at what Henning presented and he basically laid out the majority of the thoughts under his slide number four, it wasn't numbered but it was slide number four which started databases and identifiers 2012 and it started with recommendation near term and long term.

And Rosemary and I took a look at each of those and said where would that maybe already be something that is being looked at or where might it best be addressed.

So for the items under the recommendation, the first item was the LNP and ENUM integration and we do know that work is underway at the NPAC and FON PAC related items on this issue.

And then the next item under that was toll free services and we felt that ATIS already has an organization SNAC that looks at those items and so those issues could potentially be issues that are worked at SNAC.

The future identifiers in support of industry trends beyond e.164 numbering plan, we felt that this could be worked at the FON group and would fit with some of the already proposed items for potential efforts.

I know that when Suzanne made the presentation for the FON working group -- but there have been a number of items that people have talked about in the FON that this would fit in with if proposals are made to the FON working group on those issues.

Then we looked at under the near term, although we called out that the

timeframe of near term was not defined but it seemed somewhat like more of the type of convergence items that we might see and the first was the ENUM model and again we stated that some work is already underway but that we might also consider because of the routing aspect of this, that CIGAR would be a good place for that to fall and SIGAR is under I-Connective at this point.

Then the toll free identity issues related to current dependence on LATA NPACbased routing and call party based charging, so we weren't seeing this as specifically a numbering issue but it may fit as something that could be referred to this ATIS SNAC forum.

As to considering identifiers outside of the e.164 numbering plan, this again could be worked at the Future of Numbering working group and again might fit with some of their already suggested items that may come in as contributions there.

Determining the M to M impact if any for identifiers, and we know that ITUT study group two has M to M and there's one M to M as a working group, and FON already does have an M to M issue and also tracks with ITUT study group two.

Then creating an international database strategy, we felt this fell outside the scope of NANC and perhaps could be worked better at an international forum like the ITUT study groups.

For those under the longer term, the idea of setting a schedule for nationwide ten digit dialing, this area does require regulatory bodies, the state regulators and the

FCC, state for the delegated, to address that type of a change.

And then you may also want to bear in mind the comment that was made in the INC report in regards to the protected routes.

And then align LATA and rate centers elimination with bill and keep implementation date, and again this would require that the FCC address a change of that nature and I know that that's in the transformation order as far as determining access but it didn't really say then what, so.

Implementing non-geographic number portability which becomes possible with the elimination of long distance specific charges to consumers, we felt that this is one that from a non-geographic number portability perspective could be worked at the LNPA working group.

The security anti-spoofing and privacy, at the time we put this together we did not realize that we were going to hear about that today from Henning Schulzrinne, so we said that this longer term work which could align with some work under ATIS and we would suggest that maybe we wait and hear about that from Henning's proposal later today.

The use of location data, again this is probably a longer term item and again could align with some of the work under ATIS and the role of IPV6 and DNS in emerging identifiers, again longer term work that could align with the work that ATIS has in their normal course of work. So that's kind of where we saw it.

I would hope that we can have some discussion, dialogue, comments around

the table.

COMMISSIONER WHY: Actually I had one quick question. We have lots acronyms in this world of NANC and I don't recall the ATIS SNAC form acronym. Could you refresh my memory?

MS. RETKA: I'm going to kind of go from -- I'm winging it. SMS 800, numbered administration center.

COMMISSIONER WHY: Okay, thank you. I will keep that in my head as I memorized all these acronym. Hank.

MS. RETKA: It wasn't a lunch break.

**(LAUGHTER)**

MR. HULTQUIST: Hank Hultquist, AT&T. Mary, at the start of your presentation you said that you were going through the presentation to determine items the NANC could provide guidance on. I mean what does could mean? I mean is it could if the FCC asked, or is it could on its own?

MS. RETKA: Thanks for the good lead in, Hank.

MR. HULTQUIST: Are there items here that if the FCC asked the NANC for guidance on we couldn't provide guidance on?

MS. RETKA: No, it wasn't intended to be representing any lack of ability. In our last meeting I heard when I asked the question about where we were headed with some of the work that we all saw as necessary from the presentation, Chairman Kane had indicated that she had asked the Commission about what the expectations

were but she had not heard back yet.

So what I really meant when I was talking about what we could work on would be based on the direction that we would get either from the NANC Chair or the NANC Chair getting that from the FCC.

And in the timeframe since that as you've heard from the reports at the table, there have been groups that have taken on issues based on contributions that have come into them.

MR. HULTQUIST: Okay, so my assumption is if the FCC asked the NANC to work to provide advice or guidance on any of these items in fact we would take that on and we would provide such guidance, is that your understanding?

MS. RETKA: Yes, that's my understanding. And of course recall that back in 2005, when that initial VOIP item came out we did work through the FON to make a recommendation on VOIP and that's still a document that parties are looking at all the time.

COMMISSIONER WHY: Any other questions? Yes.

MS. JORDAN CAMPANOLI: Paula Jordan, LNPA working group. My question Mary, is on the first item, the LNP and ENUM integration, it's my understanding the NPAC FON PAC committee is going to go away once the recommendation is made so I'm not sure if you meant that that should be the LNPA working group to work on this. The reason I'm saying that is because we do the requirements for the NPAC so I just thought it would fit better with the LNPA



working group.

MS. RETKA: Yes, that's a good point, Paula. I think obviously the idea was that as the work is done and as we work through the process in that group it may be something that would be best referred to the LNPA working group and we can make that change if that's a suggestion everybody would agree with.

MS. JORDAN CAMPANOLI: And the other one is the ENUM model, I'm not sure USUS work underway at the NPAC, you mean the LNPA working group or --

MS. RETKA: Well, what we were referencing was as we move forward with functionality at the NPAC related to things like URI.

MS. JORDAN CAMPANOLI: So that would be the LNPA working group?

MS. RETKA: Yeah, you're right, thanks.

MS. JORDAN CAMPANOLI: Thank you.

COMMISSIONER WHY: Any other questions for Mary? Of course, Jose.

MR. JIMENEZ: Thank you. Jose Jimenez with Cox. Mary, the guidance from the policymakers comes in the second page but are there items on the first page where policymakers would also need to get engaged, I mean the FCC or states like redefining portability for instance to include ENUM, things like that. How does that work in the model that you guys developed because I see them specifically called out in the second page? I'm just curious about it.

MS. RETKA: So Jose, we really didn't develop a model and this isn't really a policy document. This was a result of an action item at the last NANC meeting and the intent was just to be directionally focused about where things could be worked but absent a change in the regulatory requirements about dialing and dialing parity and things like that, the NANC itself would need that direction on ten digit dialing nationwide based on some FCC and delegated state authority.

MR. JIMENEZ: But does NANC also need for instance -- or do we need some guidance from the FCC on ENUM for instance from the FCC as well? That's what I'm curious about.

MS. RETKA: Well, as I said a little bit ago I know that Chairman Kane has asked regarding all the issues that were raised in Henning's presentation to the FCC and I think she is awaiting a response.

MR. JIMENEZ: Okay, and that includes the ones on the first page?

MS. RETKA: It was the entire presentation, yes.

MR. JIMENEZ: The entire presentation, thank you.

COMMISSIONER WHY: Hank.

MR. HULTQUIST: Hank Hultquist, AT&T. So now I'm kind of wondering what Jose means when he says do we need some guidance on ENUM. I'm not sure what that would mean. I mean I think that the industry is free to develop ENUM capabilities. Ultimately whether those are adopted in some form into some regulatory status is a separate question but I don't think the industry needs

guidance at this point on ENUM but maybe there is some aspect of it that we do.

MS. RETKA: One thought Hank, is depending on the functionality if you consider it as a back off system for example, is that really kind of where you were headed?

MR. HULTQUIST: I think in the past we have done change orders for instance in NPAC and the FCC never ordered us to make those changes in those capabilities and we had big fights. I mean we can all remember the fights we had over change order 400 and things like that. But it wasn't in response to anything so I'm kind of curious if there's some difference here.

MR. ROGERS: Greg Rogers with Bandwidth. I had similar questions and it seems to me, is the answer perhaps that it's the sort of connection to NPAC and the idea that ENUM somehow is tied in with the current systems and databases and uses of those by -- that are also integrated into the North American Numbering Plan that means that you would in fact have that regulatory oversight as you said? I mean I have the same question frankly.

MR. HULTQUIST: Hank Hultquist, AT&T. I'm not saying it wouldn't be good to have regulatory guidance. I think it's always good to have guidance from the policymakers but I'm just questioning the idea that until such guidance is in place these things can't be worked on.

MS. RETKA: You know, it's good that Henning just stepped up to the table and perhaps he can help a little bit with the fact that he was able to come and make

this great presentation to us in February and we're still hoping for a little bit more direction as to the expectations of NANC from the presentation.

MR. SCHULZRINNE: Let me try to address a little bit motivation and I really do appreciate the follow-up attempts on my relatively high level presentation on that.

What I was hoping for is not necessarily through kind of a mandate process but a collective thinking of people who have been in the industry quite a long time and relatively newer players, that it seems like an appropriate time to think about where we want to evolve to, whether this happens in the Future Numbering committee or in other aspects. I certainly am (unintelligible) to that particular one.

I would also see that beyond just simply like an ENUM issue in particular because that's a particular technology but to see that as we maybe look forward in what are new requirements that we want to address and we'll be talking about one of those in a few minutes presumably on the number spoofing issue which has database implications as well.

And instead of doing a kind of piece by piece little (unintelligible) and make little changes there, is to do a little bit more strategic planning if you like and the Future of Numbering committee might be the right place for that but not so much as to how do we do a change order specifically for that. It might be more longer term strategic as opposed to a tactical change order process even though there may be some tactical things that may need to done.

And the goal here is not to much do that by command and control type of mechanisms but we collectively can arrive at a solution that gets us on to a good trajectory particularly as we deal with the transition issues in general.

So again as you said the committee can do lots of things for change orders all by themselves without waiting for us but I'm hoping that we can coordinate that in ways that make it easier to have a transition, to have parties involved that we talk to that may not necessarily be part of a NANC process, all of these type of things in that.

And again I see that more of a strategic one, the GIT issue, Just In Time issue is another one of those which I had indirectly alluded, namely moving away from an only pooling model to that.

So for example one of the strategic questions that I think NANC can be quite helpful with is an evolution versus parallel, a process. An evolution process essentially where you do one change order at a time if you like and eventually you arrive at a place that we are all happy with.

The parallel model is to basically say what happens in many of industry results where it is that you maintain the old system but in parallel you think about what your new system is, you make sure they are (unintelligible) in the correct way but you're not constrained by every historical artifact in the old system.

I would really value personally as well as I think it would be helpful for the Commission, to get some sense as to which of these two models we want to pursue

as we look at future numbering in general.

And I very much agree with the opening statement, namely numbers even if we decide to have additional 9164 identifiers for example in the machine to machine space that numbers, ten digits numbers, e-164 numbers will remain a central facet of a transition, post transition as well and we need to make sure that they don't get encumbered or become unworkable in ways that essentially yield decisions that we would all prefer have not to be made. Does that make a little bit more sense?

MR. ROGERS: Greg Rogers with Bandwidth. I think that's really what the questions were aimed at, is this idea of whether it's happening in parallel or whether it's an evolutionary process of what we currently have.

MR. SCHULZRINNE: And parallel doesn't mean NANC wouldn't be involved. It would just be a way of -- one version of that that I've seen that works in other fields is where you start an effort that's aware of it but it is not encumbered by the same timelines and the same operational needs in that because you're not breaking backward (unintelligible) with that, you're just simply allowing other things to happen in parallel.

So you can still do you (unintelligible) query, you can still do you SS7 queries, you can still do whatever but there's another avenue that may have different needs and may not be constrained by the same Legacy considerations for example.

That's a question which I would think and I'm hoping that as the committee goes forward that as a committee as a whole and as subcommittee, we can make

progress on together in addressing those issues because I think they are starting to get urgent and as we discussed, we don't want vacuum to develop where groups that may not have a full representation and knowledge base feel compelled to act outside the commission, outside NANC, because it is seen that we are doing Legacy only here. I don't think the NANC wants to get the, we have a Legacy committee reputation.

COMMISSIONER WHY: Thank you, Henning. Yes, Rosemary.

MS. EMMER: Rosemary Emmer, with Sprint. I just had a quick question. You had mentioned the two models that you were referring to. I think you were mentioning the Just In Time numbering as one model. What was the second model that you were referring to?

MR. SCHULZRINNE: I'm sorry I wasn't quite clear on that. It wasn't just about Just in Time. One possibility is if we agree that because of the voice of IP and IP transition in general, number assignment management and so on will change on a longer timeframe whatever number of years you attach to that.

One model to make the transition happen is you change essentially as little as possible in what works today, what works well in terms of number portability, what works well in terms of pooling, all of these well established things that the committee has been so instrumental in making happen.

But that in parallel without breaking things, without worrying about breaking Legacy systems for example, you pursue with a more forward looking

system which is on an op end basis and if you want to ignore that new stuff because it's not relevant to you, you can mostly be okay with that but the new type of transition doesn't have to take every single Legacy consideration into account because it's not addressed to the Legacy.

So the question really is more strategic direction, namely do we pursue that model or a strict one track model with a change order at a time type of process. That's really the question.

MARY RETKA: But Henning, and I don't have a card or anything to hold up I just want to make sure you -- one must recognize the obvious timeframe of convergence and I fail to see how a party who is in the North American Numbering Plan could ever have a time when none of their customers wanted to call customers who were part of a different addressing scheme and I think that's got to be taken into consideration when you think about a parallel path. There's always going to be a crossover.

MR. SCHULZRINNE: Right, thank you for clarifying that. I was not talking about the separate numbering scheme here and clearly we all want to make sure interconnection remains. That's going to be the ultimate goal, a non-negotiable part of the discussion.

But what I was talking about is more of the mechanics just to make it a little bit more concrete, say we were as a purely hypothetical, to develop a database access mechanism, just incompatible, or an assignment mechanism which is



incompatible with the existing structure. You still have numbers, you still would connect, the database in background would be exactly the same. There would OCNs and SPIDs and all of that stuff would still be there, but the way it's managed is one IP centric model which is not encumbered by that. From a customer perspective, from a carrier perspective nothing would change.

MARY RETKA: Not quite sure from a customer perspective because I think if a customer moved over to an IP based system they would still expect that everything they had before would route correctly to them in the new system.

MR. SCHULZRINNE: Yes, that's why I said connectivity has to be maintained. It just means that internal processes for a new provider, this came up early in the voice of IP discussion, to make it easier for new providers that don't really need to know all of the Legacy stuff for example, they would be able to successfully integrate into the system so that calls get routed correctly, connectivity gets maintained, all of the things that you mentioned.

COMMISSIONER WHY: You know, this is a very healthy discussion. I know we have another of other items.

MR. SCHULZRINNE: Yes, so I don't want to monopolize that.

COMMISSIONER WHY: We are really grateful for you to be here Henning, to help us understand all these things.

I see a couple of cards up, Verizon, you guys, and Jose. Maybe we'll just have two more questions on this item before we move on. We have actually three

significant items I see on the agenda before we can wrap up today. So Jose if you can keep it brief.

MR. JIMENEZ: Very brief. I really just wanted to say thank you to Rosemary and Mary for doing this. It really helps to lay it out about all the different working items.

And thank you Henning for your explanation and it basically answered what I posed originally which is the FCC will be part of this overall process and I was just curious about how that would work. Thank you.

COMMISSIONER WHY: Kevin, did you still have a question?

MR. GREEN: Kevin Green, Verizon. More of a comment. Henning, the way you're describing this parallel track sounds very much like what we're doing with Next Generation 911. It would have to be backward compatible and it would have to work together as well as looking at a whole new system, more of an IP based system so it sounds similar to me.

MR. SCHULZRINNE: Yeah, and just a quick comment and this is actually I think a reasonably good model where you define a small number of interface points so that evolution on both sides, operation of a Legacy system and the operation of a new system are not unduly constrained. So you have Legacy, Gateways for example in the 911 system so that's a pretty good model. Thank you.

COMMISSIONER WHY: Thank you, Henning, thank you, everyone. I have one quick question for you, Mary. I though my pinch hitting duties would be

very light today.

**(LAUGHTER)**

But the question I have for you is, what are the action items if any for Chairman Kane with this document?

MS. RETKA: In the last meeting Chairman Kane asked for people to send her an e-mail if they were interested in working on this going forward.

I know she had to leave for the funeral so I don't know who all she got as people who wanted to work on that going forward so I kind of thought that if she were here she might have said here are the people that want to work on this, let's have them do this as an IMG, an issues management group. So perhaps what could be a good thing is if you wouldn't just talking to her about what her expectations are.

COMMISSIONER WHY: Sure, that sounds very reasonable to me. I will speak to Chairman Kane, probably in the next day or so about all the items that we've covered in her absence and this will be one that I will address and I'm sure she will e-mail the group as to what our next steps with this item will be.

MS. RETKA: And I do know that at the last meeting she did ask for people to let her know if they wanted to work on an IMG and if you forgot to do that it might be a good time to do it now, maybe before the next meeting.

### **UPDATING THE TRAINING MANUAL**

COMMISSIONER WHY: Thank you, Mary and thank you, Rosemary for

your hard work on this. So Item 14, updating the training manual. Rosemary.

MS. EMMER: This is Rosemary Emmer with Nextel. Beth O'Donnell and I are working on this project together. It's the draft, the version three draft of the training binder, we call it a manual and a binder, anyway it's the training binder and it's in your e-mail box right now. It was sent out yesterday.

So if anyone has substantial changes or if you have any ideas for new chapters please e-mail them to me, otherwise all of the co-chairs and all of the past contributors have already been notified to update their own sections so they can get with the working groups and do whatever needs to be done to update the sections that the prior contributors had and they're going to get those to us by November 20th. So our goal is to finalize the third version of the training binder, Beth and I would like to have that finalized at the December meeting. That's all.

COMMISSIONER WHY: Thank you, Rosemary. Again, appreciate your hard work on these and other items.

### **ROBO CALLS ANDCALLER ID SPOOFING**

Any questions for Rosemary? Seeing none we have the long anticipated presentation by Henning. I'm going to give Henning my copy of the presentation. This will be Item 15, the presentation by Henning Schulzrinne on robo calls and Caller ID spoofing.

MR. SCHULZRINNE: So as I mentioned during my presentation last time one of the items that I saw as a near term urgent item is to deal with the

rampant misuse of numbering primarily in the issue of illegal robo calling.

So today I want to give you a quick update on the problem in a little bit more detail as well as describe some of the efforts that are ongoing slightly outside probably the usual circle of people that are in organizations that are working on that that have been mentioned here.

So I will talk about what is spoofing, is there good spoofing as opposed to just bad, spoofing doesn't have a good name to it so to say, what happens, what's the relationship between robo calling and spoofing, they are obviously not quite the same, what can we do to reduce and possibly eliminate it long term, what are some of the ongoing activities, and a little bit about of caller name display as well.

I want to just emphasize starting that this is a very preliminary and in progress report. This is really just starting but it is important given that it is fundamentally about numbers, NANC feedback is received both individually and as a committee, and again I'm not quite sure where that would sit so that the needs of the community are recognized.

So Caller ID spoofing takes place in roughly two ways, namely individually where you can get spoofing services that are primarily meant for individuals for whatever good or bad needs, where you can essentially assert any number on an outgoing phone call to appear on the Caller ID display of the recipient of a call.

Generally speaking we have rules of that because of a U.S. Caller ID Act of 2009 as well as the phantom traffic rules in that.

The larger problem is that number spoofing is done on a wholesale level for primarily two purposes, impersonation and (unintelligible).

For impersonation the perpetrator of number spoofing in this case this is mostly of the illegal kind, wants to spoof a specific target number, not just some random number but a specific number.

And this is often used for criminal activity such as -- the easy to imagine one is you get a call and it says hi, this is your Bank of America calling. We had some fraudulent activity on your card, oh, by the way we are worried about the security so if you want to compare the number that shows up on your Caller ID display with the number which is on the back of your credit card to be sure that this is a valid call, and then please what is your social security number, account number, and all of that. Apparently that's starting to happen as well as other financial fraud.

It's been used for slotting where people call 911 on behalf of somebody else pretending that there's a home invasion going on, et cetera.

(Unintelligible) the perpetrator picks a more or less random number to essentially obscure its identify when placing massive amounts of robo calls so that they cannot be easily track down as part of the robo calling investigation and it's also used for (unintelligible) service attacks where as has happened recently, institutions, companies, as well as public safety institutions receive avalanche of calls often related to an extortion scheme in that.

So who gets spoofed? Three classes, unassigned numbers, that happens, that's one way to minimize the collateral damage (unintelligible) of nicer spoofers. Then the particularly bad kind is when numbers are assigned to some innocent random third party, typically a private residence which then leads those consumers to receive calls from the recipients of the robo call saying why did you call me, what are you trying to do.

And we have had a number of cases, indeed we have received congressional inquiries when constituents were basically forced when they call the phone company that served them -- they basically told them there is nothing we can do about them. All we can offer to you is a new phone number and we get not so pleasant stories about people who have had their phone number for 50 years and because of some criminal behavior by a third party, have to change that number.

And then there's obviously the third one which is vishing, meaning the voice of IP fishing that takes place which then leads directly to damage through criminal activity.

The impact of the illegal robo call I've largely mentioned is they range from consumer fraud to nuisance, loss of phone numbers, obviously the cost of carrier, inter-carrier compensation fraud, and consumer calls to customer service.

The Federal Trade Commission has been very active in enforcing that. There's actually a story in the *New York Times* even today on a variety of robo call related cases almost all of which involved some kind of spoofing as well but that's a

bit of a wacamall process. It takes a lot of enforcement resources and unfortunately since they cannot impose criminal penalties it is often possible for at least some of those actors to resume activity under a different corporate identity elsewhere.

We receive hundreds of spoofing and robo calling complaints every month. Compared to the Federal Trade Commission, we are just a drop in the bucket. While we may get a few hundred they get 200,000 complaints a month on robo calls.

We can't tell how many of those are spoofing because obviously the consumer without calling that number which for the obvious reasons is never recommended, can't really tell if the number shown is the actual caller or if that is again the spoof number.

So we do get explicit spoofing complaints presumably by victims that have their number used as well so as you can see that's several hundred complaints a month just for that.

I just wanted to highlight how robo calling and spoofing are related. Often the number gets injected by a third party, some are cognizant, some just simply kind of the Casablanca mode of operating a phone company, I mean the famous gambling quote so they just don't ask too many questions. In the trade I guess they are known as pink carriers, a minute is a minute kind of deal.

They are often (unintelligible) or through multiple providers that operate nothing but a server somewhere and so once it reaches a legitimate party where



good fraud control is in place they can no longer tell because the callers are no longer direct customer of theirs whether that's a legitimate use of a number or not. Often these entities are located abroad as well.

There is legitimate Caller ID spoofing that has been recognized, doctors, call centers, and on a consumer level some of voice of IP services, non (unintelligible) voice of IP services have legitimate uses of those where it has generally not been problematic but we need to keep those in mind as we develop solutions.

If we stop spoofing I think we have a much better chance of addressing robo calls as well primarily because we can then implement, and we, I mean a large number of players can implement filters that allow consumer choice as to which numbers they receive.

Currently filtering has only been modestly effective because these robo callers if they change numbers, if you add them to a filter whether that's an individual one or a crowd source filter as exists for some of the android aps, not terribly effective because they'll just use a different number for the next call.

The goal is I suspect that everybody can agree on to enable consumer choice, which kind of robo calls to receive and make filtering solutions consumer chosen filtering solutions effective without causing accidental damage to innocent third parties.

It is clear that any validation solution will not be universally adopted immediately whatever the timeline is so I've just outlined some of the cases that

may occur in that.

Generally speaking at least my hope is that even partial deployment by critical parties primarily originators of legitimate outbound call center type of calls, alerting calls, airlines, those type of calls, they will have an incentive to assign calls as was mentioned in a slide earlier, simply because it will lend credibility to their efforts and may increase call completion rates.

So the goal is to make numbers trustworthy again. The general approach that a number of people in the technical community seem to be converging on is to provide cryptographic certificates as is done for web pages today, I mentioned it briefly last time, for a number of ranges or individual numbers depending on who is getting those, if they have been assigned.

That addresses the ability of carriers as holders of numbers to assign outgoing calls on behalf of their customers as well as where appropriate, delegate that authority for example to services that serve others that have numbers such as business process outsourcing call centers, individuals with legitimate needs such as the doctor case I mentioned.

So the idea is the originating caller or carrier, most likely the latter, assigns the calling party number in the voice of IP signaling. This would only affect voice of IP signaling. I don't think anybody has any grand illusions of modifying (unintelligible) at this point.

The goal would be and it gets a little bit technical here, is that you have --

the provider would obtain and this again goes back to our previous discussion, would obtain key material, how many database administrators and in this case I have just as a kind of fill in, this may not be the only entity, it would be the NPAC at some point but it could be others as well which are then stored in a variety of databases.

It's currently under discussion among the technical people involved whether that would be a private ENUM type model or a database of some sort, that's under discussion.

The number of certificate models which I won't go into, the basic question is it could be integrated with number assignment, just get a block of numbers, you get the cryptographic key material kind of attached to it so to say logically speaking, or you have a separate proof of ownership of a number so to say, proof of ownership is more of a term (unintelligible) that's used for e-mail and web verification, not an ownership of numbers.

I will skip the next slide, the call assigning for voice of IP, that's more for the technical folks and the validation approach as well so I'll skip those two in the interest of time.

I will just mention that we will also have to deal with call paths of a non-voice of IP. There have been some proposals made that you can essentially bill an out of band system that allows Caller ID verification primarily again for large call centers and I put the United Airlines as kind of a stand in for that, so that you would

have a path primarily for smart phone type of applications that will allow the recipient to validate that the call is indeed from Visa, or Bank of America, or United, or a health care facility so particularly for vulnerable populations that might otherwise be subject to fraud.

So since the last meeting there has been a fair amount of progress. I gave a talk at the International Task Force plenary on that topic in March. In May we had the first industry meeting where some of the companies that are represented on this table participated, both equipment vendors as well as carriers.

In July we had a (unintelligible) meeting at the IETF meeting in Berlin where we had probably about 200 people participating, and just a few weeks ago earlier in September we have a new IETF working group that is looking at this particular issue, the (unintelligible) working group.

That's an open working group so like all IETF working groups you can subscribe to the mail only list. You don't have to be a member as such and we would indeed, and this is one of my goals here, would like to encourage individuals or companies through their respective engineering organizations to participate in those. I suspect almost everybody, looking around the table that is more on the engineering side has somebody on the mailing list but just in case they don't.

On October 21st I believe there is a messaging abuse working group in Montreal that will discuss that topic as well. I will be presenting based on what I've just said here.

There are international efforts for example, COTC in Canada is very actively involved. For some strange reason it seems to have a (unintelligible) border industry evolved that a lot of the robo calls that terminate in the U.S. originate in Montreal and a lot of the calls that terminate in Canada originate in Florida and Nevada.

It seems to be some kind of venue seeking I suppose, jurisdictional issues that encourage that and I suspect it is one of -- we care more about citizens of our countries as opposed to close neighbors to the north or south.

We have the IETF working group. This is just a web page on that. Again this is not an FCC effort. We have FCC involvement. It doesn't preclude other efforts but it's a very active effort where documents are being presented. At the moment we are defining the problem as part of that working group. That is more exploratory. There is no working group on that effort.

The final topic I wanted to briefly -- and increasing your liability of caller name delivery as some of you know, textual Caller ID obviously is very important to consumers, in many cases more important than the number because that's what they see.

And the traditional model where you could pretty much rely on the phone company validating that based on business records is now being challenged both on the provider side as well as on the delivery side, delivery side because of data based (unintelligible) costs, some service providers do not actually use the official

(unintelligible) or “official” databases.

They use other information that’s often less than reliable and indeed there are services, I have one under slide at the bottom that allow individuals and companies for good reasons and sometimes maybe not so good reasons to populate the data in the SENUM databases for name look up which opens up additional fraud vectors in particular for spoofing, say financial institutions and that.

So there’s discussions on a mailing list which is kind of a preliminary discussions on whether the opportunities for carriers to provide additional identify information and additional information about the sources of information that is displayed that gives consumers a better choice and better indication as to how much trust they should put into the information that is being delivered.

And I’ll conclude on the next slide, as far as we can tell robo calls between the Federal Trade Commission and us generally probably the highest volume of consumer complaints and I suspect those of you at the state level see some of that as well. It is certainly a nuisance and it is also a significant fraud vector with real financial damage by consumers and obviously carriers as well.

Stopping spoofing will greatly reduce robo calls because it allows modern filtering techniques on the consumer side as well as by carriers to be much more effective as opposed to being circumvented. There are a number of initial efforts at technical solutions. The optimistic versions are that we will have a (unintelligible) implementation horizon of that so there well might be the need for interim solutions

that were being discussed as well on a more selective basis in that.

In general this effort because a number of people in the building and elsewhere want to make that happen in a relatively short time scale, this is really something that can't be delayed indefinitely.

Among other reasons I believe it is for land line customers -- I have heard from a number of people that the robo calls themselves are a factor that lead them to abandon land lines because they are somewhat more prone to those activities unfortunately for a variety of reasons and so in and of itself I think there should be a sufficient self interest if nothing else to address this topic on a broad scale soon.

Need industry, NANC, other input as soon as possible if there are considerations for example that need to be taken into account in the requirements as well as on the operational side as well. It affects databases for example, how do we deliver cryptographic information to carriers and other parties so that they can validate that, obviously affects on the NANC purview as well.

So with that I'll take any questions time permitting.

COMMISSIONER WHY: Yes, questions for Henning. We have a handful of cards going up. So if we could keep them brief. I know the meeting has been going on for awhile. Mary.

FEMALE SPEAKER:(Off microphone, unintelligible)

COMMISSIONER WHY: I know, I've heard until 5:00 p.m. or thereabouts.

FEMALE SPEAKER: Two days.

COMMISSIONER WHY: Two day meetings, oh, my goodness. Okay, we can do that again, why not?

**(LAUGHTER)**

Okay, Mary, please.

MS. RETKA: Henning, thank you for your presentation and just as your last presentation, very good material and it will generate a lot of discussion for us.

I wondered if you were aware of some of the work that is going on under the ATIS Next Generation Inter-Connection Inter-Operability Forum already in regards to the issue related to auto-dialers and the work that has been underway there is working to develop some of the auto-dialer documentation that's necessary to talk about the expectation and the best practices related to auto-dialing.

MR. SCHULZRINNE: Yes, and I see that as complimentary in a sense that the auto-dialer type would be indeed one of the entities that we would need to implement if that is a chosen solution, the kind of cryptographic mechanisms that we talk about.

But these would be -- it's undertaken as part of the IETF effort because their the stewards generally, a recession initiation protocol which would be initial target about so I see those as complimentary and thank you for pointing out that effort.

COMMISSIONER WHY: Yes, Valerie.

MS. CARDWELL: Valerie Cardwell, Comcast. Again, fantastic



information, thank you so much. I have three statements, one being the first similar to what came out of your initial presentation. I'm wondering if some of the issues that were raised here, not to give Rosemary and Mary additional action items, but similar to what was done with that presentation. I feel the need just reacting to what I'm seeing here of a similar type of dissection of where should some of these things go. That's just a comment.

MR. SCHULZRINNE: That's something I would like to discuss probably in a smaller circle as soon as possible.

COMMISSIONER WHY: And I think Chairman Kane and I will definitely be discussing Henning's presentation and thinking about what the next steps that NANC could do. You know, probably thinking about maybe working groups or other action items.

MS. CARDWELL: Thank you. So specifically on slide 13 where it addresses a proposal or something about the NPAC, I mean given the fact that we all know about the NPAC, you know, the RFP and so forth, my question is -- I got the impression that you said you were talking to the NPAC provider.

I'm not trying to put you on the spot but bottom line question is, given the RFP and the whole thing going on with NPAC, is there something urgently that for NPAC considerations since the new contract is being openly discussed, actively discussed, that needs to be brought into that discussion?

MR. SCHULZRINNE: My timing is a little unfortunate in terms of

just where these things are. It's too premature at this point since we don't know exactly what the standards would be to do that at this point.

We hope that the normal process of evolution when the new contract is in place will allow, once consensus is reached to make those changes in that we do have participation by a number of parties in that so I think there is awareness of that going on. But the consensus was there was no immediate possibility given the preliminary nature as well as need to kind of stop the presses and interfere with that process.

MS. CARDWELL: Thank you.

COMMISSIONER WHY: Jose.

MR. JIMENEZ: Jose Jimenez with Cox. Henning, I remember and maybe I remember wrong, but I thought the FTC was looking for proposals to address robo call issues. Wasn't there some requests for proposals to some contest or something they were running? How does that relate to this? I'm just curious.

MR. SCHULZRINNE: Yes, so there was, you well remember, namely it was a challenge.gov effort between -- primarily I would say led by the Federal Trade Commission. I was one of the judges on that challenge and if you've seen the *Wall Street Journal*, if you read it very carefully we are on the other side of a lawsuit on that by one of the sore losers.

**(LAUGHTER)**

And partially I would say the goal of that competition was to have a short

term deployable solution, short term as in measured in months as opposed to years. And what came out, my personal take on that was it was clear for almost all the solutions that were proposed including the winners, that while they might well so we hope provide some relief, they would primarily catch the dumb robo callers to be quite frank about it.

**(LAUGHTER)**

Namely there are still a number of robo callers that don't change their number for example either because they can't as a service provider, or because they don't know how to, or don't see the need for it. Unfortunately the fear is that as these type of techniques get deployed, namely that filters get deployed that the incentive to spoof will increase to bypass those filters.

So I see that as kind of a one, two process, short term might help, that unfortunately requires particularly if you look at the winning solution, it requires carrier cooperation in terms of API interfaces and a solution that deals with a very likely immunity, that eco system is going to evolve to some of the solutions proposed.

But yes, thank you for pointing that out and I'd be happy to talk in more detail about the competition and the solutions proposed as well but probably elsewhere.

MR. JIMENEZ: Great, thank you.

COMMISSIONER WHY: Yes, Michael.

MR. ALTSCHUL: Michael Altschul, CTIA. Now (unintelligible) policy as a lawyer rather than technical work as a subject matter expert, but in particular thank you for that last answer because a number of us were called before Senator McCaskel to address this very issue a month or six weeks ago and she wasn't much impressed with the movie title that's complicated or that every time you build a wall people will come back to you with taller ladders and start doing these things to evade.

One of the lessons I think we all learned when the Caller ID Act was proposed and passed in 2009, was as you demonstrate in the slide 10 of your (unintelligible), there turned out to be some legitimate needs, or legitimate use cases, I won't say need, for spoofing that Congress certainly created and created a very bit of a sieve for the Caller ID rules.

My technical folks have explained to me that on the SIP side the real problem is the ability for anyone who wishes to disguise the originating source of messages, proxy servers and there are a number of them, but in particular it seems to be beloved by privacy groups, human rights groups as a way of allowing anonymous comments and communications and the kind of people that the State Department and other policymakers may actually wish to have voices.

And I'm wondering how this technical solution works in that kind of SIP environment where the last server or the proxy server can strip away the identifying information. Did I get that right as a lawyer?

MR. SCHULZRINNE: Close.

MR. ALTSCHUL: Okay, good. You know, with the law that's all you can hope for.

**(LAUGHTER)**

MR. SCHULZRINNE: Your question really deserves a much more thoughtful and long answer then I think we have time for today but let me just address briefly two aspects.

Namely one is as you pointed out quite correctly is the proxy servers have facilitated this type of behavior and it's largely not kind of human rights organizations that are doing that unless you consider providing credit fee, reduction services as a human rights, particularly the bogus kind.

But also this is not a completely new problem. For example ISDN has had that facility for many years. It just the barrier to entry shall we say was a little higher.

MR. ALTSCHUL: The club was closed.

MR. SCHULZRINNE: Yes. And as you said I only see that and as you hinted at, for a variety of reasons both practical and in some cases policy, this does not change the ability of callers to suppress the Caller ID, that is not affected by that, and indeed it will probably not prevent somebody injecting bogus information in that.

If you as a recipient decide to receive such a call nobody will presumably,

well, I'm pretty sure the Commission will never prevent you from receiving such a call. It will allow however for entities that do not wish to receive un-validated calls to express that preference on their own. This is the CMAST system saying something.

So the goal here is not to force anybody to do something but to encourage people to validate call information.

And there are a number of people on the group that are very much concerned about privacy but we will need, and this goes back to Senator McCaskell's comment, I think there is -- your statement about walls is one where I think there are two steps to that, namely yes, we can always -- the taller ladder problem but just because there's a taller ladder doesn't mean people still don't build walls.

And also that I believe we are now at a stage where we can indeed work on technical solutions and the tolerance of policymakers particularly outside this building for not doing something is going to be fairly limited so that's why I said we need to work on that even if it doesn't take place for two or three years.

And collectively this is why I want to involve NANC as early as possible because the impact on databases and others, that we need to have a plan if a technical solution emerges and I am, speaking as technologist, reasonably hopeful that we will indeed have something that makes it very difficult for the bad actors to surpass those walls.

We know for example in the web world while it has not been the complete

solution certainly signed web pages have greatly reduced the impact of fraud on web pages for stolen credit cards and also importantly increase the confidence of consumers in the system. I see real danger that if we don't do something that the trust of consumers in the phone system whether voice of IP or otherwise will be greatly reduced which will harm everybody.

COMMISSIONER WHY: Thank you. Hank.

MR. HULTQUIST: Hank Hultquist, AT&T. Just ask Commission Why and the FCC to please send around Henning's presentation so we can share it with people in our company who would be interested in this.

COMMISSIONER WHY: Absolutely. Thank you so much. Any other questions for Henning in the room or on the phone? Seeing none, thank you so much Henning, that was very enlightening. Thank you so much.

### **SUMMARY OF ACTION ITEMS**

That is it for our items and presentations but we have one additional item here and that is a summary of our action items.

So Paula brought up a Best Practice 30 regarding relief planning. And before we go to a vote I think we need to determine is there a consensus to move to a vote today and I know Commissioner Kjellander had some comments about whether or not we should go to a vote today. Commissioner Kjellander.

### **PUBLIC COMMENTS AND PARTICIPATION**

COMMISSIONER KJELLANDER: (Unintelligible) comments on that.

No, I feel prepared and ready to roll. The only thing that goes through my mind coming from a state that several years back toyed with the idea of coming up with three area codes and just basically not knowingly creating a disaster. Thank God it didn't happen.

What we learned from it was that the overlay was the right approach and as I look at this overlay recommendation I for one as a state with a single area code don't see this as somehow taking away a tool from the toolbox, however some other states that maybe haven't wrestled with this and look at the current toolbox and may well think that may in fact be what this is.

So I think as long as there's a clear understanding that moving this forward to the FCC where there might some future rule making would also allow for some necessary comments that all states could participate in.

I really don't have a problem with moving it out today and getting it on its way to the FCC so that maybe we could see some kind of action going forward.

I personally think an overlay is the right decision but I also know that there will be other states that may want to weigh in, may want to give it some more thought and so I look forward to that process as well.

COMMISSIONER WHYE: Thank you, Commissioner Kjellander. I see one of our new commissioners, O'Neal Hamilton, you have a comment.

COMMISSIONER HAMILTON: Thank you. On this particular matter if it goes forward today I would have to abstain since we have a docket that this is



going to be discussed as to the way we would go with 843 coming up pretty soon and I would prefer it to be delayed but if it goes forward I will abstain. Thank you.

COMMISSOINER WHYE: Thank you, Commissioner. Yes, Kevin.

MR. GREEN: Kevin Green, Verizon. This question is really for the FCC. If the vote were to proceed and there was consensus, what would the FCC do with the Best Practice, would they put it out for comment which would give the states a opportunity to weigh in or what would the process be?

MALE SPEAKER: Once we get it we take it under advisement and go forward. I couldn't tell you if it would go out for comment or what the next step would be but we definitely obviously get it, take it under advisement, and more forward with it and give it consideration, and it could be done away with right away. I mean we'd have to go through a process so it isn't going to happen quickly.

And while we have a break I'll add I have a sign up sheet so if you haven't signed the sign up sheet and you're on the table please stop by and sign it before you leave so we have an official record of who was here and who wasn't. Thank you.

COMMISSIONER WHY: Yes, Rosemary, please.

MS. EMMER: Rosemary Emmer with Sprint-Nextel. As someone who has given testimony in states as far back as 15 years ago about splits versus overlays and that kind of thing, I think the time is very well right and Sprint would like to see this Best Practice move forward.

COMMISSIONER WHY: So hearing no objections I think there is consensus to move forward on a vote on Best Practice 30. Is that correct? So anyone opposing to move forward on a vote, please raise your hand or say nay. Seeing or hearing none we are going to move forward to voting on Best Practice 30. Yes, Rosemary.

MS. EMMER: This is Rosemary. Just procedurally I'm just feeling the need to interject that we don't vote at the NANC. Our rules, regulations, and policies are you have just asked the question and you asked if there was any objections and there were no objections and via the consensus process that's all we would need to do. And I apologize for having to stop that but procedurally that's how we roll.

COMMISSIONER WHY: Okay, thank you.

MALE SPEAKER: But we should make sure we note any abstentions though so for the record we have abstentions on the record as well.

COMMISSIONER WHY: Okay. So my understanding, Rosemary is I'll ask for objections, if seeing no objections, and asking for abstentions so we know there will probably likely be one abstention. So we will move forward with the question. No, we will not move forward with the question. We have one more comment or question. Yes, go ahead.

FEMALE SPEAKER: (Off microphone, unintelligible).

COMMISSIONER WHY: Not quite yet. I will get there very quickly. So any further comment about this Best Practice 30? No more comment. Is there

any objection to move forward on this Best Practice? Seeing no objection, are there any abstentions? Yes, I note two abstentions, one from our colleague from South Carolina and another from our colleague from NCTA. Any others on the phone? Yes, Karen you had a question?

FEMALE SPEAKER:(Off microphone, unintelligible).

COMMISSIONER WHY: Are you abstaining, Karen? So another abstention from CompTel. So seeing no objections we will move this forward. Thank you so much.

### **OTHER BUSINESS**

To conclude I will say that our next meeting will be on December 10th. I believe it's at 10:00 a.m. Thank you all and safe travels.

Excuse me, public comment, yes, I'm sorry, public comment. I'm fast forwarding to get us all out of here, Paula, sorry.

MS. JORDAN CAMPANOLI: I'm going to be real quick as long as everybody agrees.

I forgot to request the NANC flows that were imbedded in the report and also attached to the e-mail that came out, it's version four of the NANC flows, because we made changes to those for Best Practice 65 and the first port notification, those need to go to the FCC for their approval also.

COMMISSIONER WHY: Thank you, Paula.

MS. JORDAN CAMPANOLI: And then the LNPA Working Group is

also asking for a status on Best Practice 67 which was presented at the NANC on May 7, 2011, and Best Practice 70 which was brought to the NANC on September 15, 2011.

COMMISSIONER WHY: Thank you. We have another commenter.

MS. POTTER: Yes, hello, my name is Amanda Potter. I'm with Latham & Watkins and I'll be very brief. I know people are trying to get out of here but I just wanted to inform anyone who does not know and I'm hoping most in the room if not all in the room are aware of two letters that my colleague Matt Brill and I have sent to the co-chairs of NAPM to raise concerns related to the ongoing vendor selection process for the next LNPAs.

As a general matter the purpose of our writing was really to encourage the co-chairs and NAPM generally to insure that the ongoing process is a competitive one and towards that end and actually for the purpose of reducing the price of the next NPAC contract.

More specifically we included some analyzes in our two letters, first off we had an analysis of the current LNPAs estimated profit margins based on publicly available information of Neustar and we think that that analysis shows that the profits that are being earned under the current NPAC contract are excessive and need to be reined in.

But our second analysis that we included was a fair price analysis where we tried to estimate what a fair price for the next NPAC contract would be.

So those letters are now publicly available on the FCCs ECFS system so we really encourage you all to scrutinize them, to review them, both in your oversight capacity with NANC but also individually and collectively as members of NAPM. Thank you very much.

COMMISSIONER WHY: Are there any other individuals wanting to make a public comment?

Commissioner Kjellander has his card up.

COMMISSIONER KJELLANDER: Ask a question of somebody who made a public comment?

COMMISSIONER WHY: I see no problem with that so please.

COMMISSIONER KJELLANDER: If they'd yield. I'm just curious. You mentioned two letters that you and a colleague had sent. Who did you represent?

MS. POTTER: That's laid out in our letter but we have not disclosed the party that we represent.

COMMISSIONER KJELLANDER: Why?

MS. POTTER: Our client has asked not to be identified or discussed.

COMMISSIONER KJELLANDER: So an unidentified client, okay, thanks.

COMMISSIONER WHY: Thank you. Any other business that we need to discuss? Yes, go ahead.

MALE SPEAKER: I have no comment about the last exchange.

**(LAUGHTER)**

But I will comment, Paula, thank you for your presentation about the Best Practices. We are diligently working on them. We realize that it is very important to get those done and we do have those in the hopper so to speak. So thank you for reminding us but we are very diligently working on those Best Practice issues and thank you guys for your work on that. We appreciate it.

COMMISSIONER WHY: Thank you, Sanford. Mary.

MS. RETKA: Procedural things, so since we have already talked about action items and Paula brought up the action item to forward the flows which get referenced in some dockets to the FCC as well, when you sent Best Practice 30 the flows would go with it.

COMMISSIONER WHY: Okay, thank you, Mary. Any other questions or business? Rosemary.

MS. EMMER: This is Rosemary Emmer with Sprint, sorry. So procedurally we should probably ask the question about the flows just to make sure that we do what we're supposed to do all the time right. So if we could just make sure that everybody is okay with that. This is only like three or four times that we've done it.

**(LAUGHTER)**

COMMISSIONER WHY: So what's the question, Rosemary?

MS. EMMER: Are there any objections to the flows that the LNPA -- to version four flows that were presented today and are in your e-mail boxes?

COMMISSIONER WHY: Did everyone get that? So any objections to

flows for version four that are in your e-mail box, 3.4 megabits of information. It's because of you I cannot send e-mails right now Rosemary but that's okay.

**(LAUGHTER)**

Anyway anyone objecting to the flows? Any abstentions? Yes, I remember. Thank you, Mary for reminding me. Any abstentions? Seeing none we will add the flows. Now we are all procedurally correct, Rosemary?

MS. EMMER: We're good, thanks.

COMMISSIONER WHY: Okay, thank you. Can I dismiss all of your from class now?

**(LAUGHTER)**

MALE SPEAKER: Second.

**(LAUGHTER)**

(Meeting Adjourned)

**(END OF AUDIO CD RECORDING)**

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CAROL J. SCHWARTZ

PRESIDENT

ON THIS DATE OF:

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