NANC

2014
PA
Performance
Evaluation
Report

Prepared by the
Numbering Oversight Working Group (NOWG)

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Executive Summary

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

- 2014 Performance Feedback Survey for PA and RNA (Routing Number Administrator)
- Monthly reports
- Annual Operational Review
- NOWG observations and monthly interactions with the PA

The PA's rating for the 2014 performance year was determined by the NOWG to be **Met**. This rating is defined below:

MET	• Performance was competent and reliable • Decisions and recommendations were within requirements

The Met rating was given to the PA for their consistency in meeting and often exceeding all requirements related to Pooling Administration and p-ANI Administration.

The 2014 survey results revealed a consistent level of satisfaction that respondents attributed to the responsiveness and expertise exhibited by the PA and RNA personnel throughout 2014.

In 2014, the PA continued to consistently perform its required responsibilities. Highlights included:

- The PA processed 139,181 Part 3s, which was the highest quantity of Part 3s processed since the start of Pooling.

- System Development for the new PAS scheduled for deployment in January 2015. This included testing and developing documentation by PA personnel while continuing to perform their daily work activities.

- Maintained PAS and RNAS availability at 99.98%.

- Secured a blanket safety valve waiver in California to enable the PA to replenish the pool with resources in the 415 NPA until the effective date of the new 628 NPA overlay.

Section 1.0   Performance Review Methodology

The annual PA Performance Evaluations are a summary of significant events that were accomplished during the 2014 performance year. In addition to the annual performance review survey process, the NOWG's interactions with the PA included the following:

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

The NOWG introduced a new streamlined survey process for 2014 to stimulate a higher survey response rate from entities. The questions were revised and a single 'Comment' section was created at the end of the survey to consolidate the participants' comments. The NOWG received NANC concurrence to modify the rating categories from the five categories previously used: Exceeded, More Than Met, Met, Sometimes Met, Not Met, to two categories: Met or Not Met.

The NOWG also used this same "Met or Not Met" methodology for the overall performance evaluation rating.

The following chart provides the definition of the two rating categories:

Satisfaction Rating	Used when the PA...
MET	- Performance was competent and reliable - Decisions and recommendations were within requirements
NOT MET	- Performance was unreliable and commitments were not met - Decisions and recommendations were inconsistent with requirements

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

Section 2.0   PA Reports

2.1   PA Annual Report

The annual report prepared by the PA is a requirement in the Pooling Administrator Technical Requirements document. The status of pooling and Pooling Administration should be reported in the annual report. Part of the NOWG's annual performance review process is to review the annual report. At a minimum, the annual report is required to contain the following information:

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

The PA provided the NOWG with an opportunity to review the draft copy of the 2014 Annual Report. During the on-site operational review in Concord, California on March 31, 2015 - April 1, 2015, the PA staff reviewed the 2014 highlights which were also included in the annual report.

Overall, the annual report provides a comprehensive snapshot of pooling and the PA for 2014. The PA 2014 Annual Report was filed with the FCC and is posted for general availability on the PA's website at www.nationalpooling.com.

2.2   PA NANC Report

The PA reported its monthly numbering activities to the NANC and the NOWG. Additionally, the PA made presentations at four NANC meetings in 2014 (March, June, September, and December). The PA reported the status of thousands-block pooling administration, p-ANI activities, and events affecting the performance of the PA, which included the following:

- Volume of pooling assignments, donations, and applications processed
- Codes opened to replenish pools and establish Location Routing Numbers (LRNs)
- Pools with less than six months inventory vs. forecasts
- Summaries of monthly reports to the FCC
- Number of blocks reclaimed
- Percent availability of PAS and RNAS
- Status and implementation of change orders
- Updates to PAS
- Updates to the PA website
- p-ANI summary

2.3   NOWG Monthly Reports

Throughout 2014, the NOWG and PA followed a standing agenda during the scheduled monthly calls. The PA provided monthly performance reports that were reviewed during the monthly calls with the NOWG. The quality and content of these reports provided the NOWG with valuable insight into the operations of the PA. Some of the standing agenda topics include:

- Application processing metrics
- Rate Center Pooling Status
- p-ANI
- Customer Focus
- Change Orders

See Appendix A for 2014 PA / NOWG Standing Agenda

Section 3.0   Customer Focus / Issues Log

Customer Focus

In 2014, at the monthly NOWG/PA meetings, the PA provided a report on customer focus items that they executed to help service providers and regulators. Customer focus items cover both contractual and non-contractual initiatives related to customer service.

There were 116 customer focus items for Pooling and p-ANI in 2014. Customer focus items included, but were not limited to, the following:

- Provided assistance to service providers on block donations
- Provided time-saving and special reports for both service providers and regulators
- Provided education and assistance on p-ANI resources
- Provided service provider and regulator training

PA/NOWG Issues Tracking Log

There were no issues in 2014, as a result this log was discontinued.

Section 4.0   2014 PA Performance Survey Results

4.1   PA Survey Ratings – Quantitative Analysis*

The PA 2014 Performance Survey was completed by a total of 89 respondents. The respondents were comprised of 55 Industry and Other respondents and 34 State Regulatory Commission respondents.

Respondents provided a rating for one question in each section. Following are the aggregated response ratings:

- Pooling Administrator (PA)
    - 81 as Met
    - 0 as Not Met

- Pooling Administration System (PAS)
    - 75 as Met
    - 0 as Not Met

- PA Website
    - 86 as Met
    - 1 as Not Met

- Miscellaneous PA Functions
    - 82 as Met
    - 0 as Not Met

- PA Industry Activities
    - 58 as Met
    - 0 as Not Met

- Overall Assessment of the PA
    - 87 as Met
    - 0 as Not Met

* The aggregated results do not include "N/A" responses.

See Appendix B for 2014 PA Survey Metrics and Bar Charts, and Appendix C for 2014 PA Survey Cover Letter and Performance Survey

4.2   PA Survey Written Comments

The survey allowed respondents the opportunity to provide detailed written comments regarding their satisfaction or dissatisfaction with the PA's performance in 2014. The majority of comments were positive, with only a few containing suggestions for areas of improvement. The NOWG reviewed all comments to determine if there was a common theme substantiated by multiple respondents.

The following is a summary of written comments that were provided by survey respondents:

- Outstanding praise for the PA staff was a consistent theme throughout the survey:
    - Responsive, Helpful, Prompt, Courteous
    - Provided exceptional support
    - A pleasure to work with
    - Well-informed, Competent, Professional
    - Excellent customer service

- Comments suggesting improvements were mostly isolated. Comments pertained to:
    - Communication of upcoming PAS enhancements
    - Timing of application processing and frequency of report generation

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

"I work with Administrators in every state and they are all very helpful and a pleasure to work with."

"PAS representatives have always been helpful when I have questions. I am very pleased with all the PAS personnel I deal with."

"PSC had no problems with the PA and very much appreciate their help."

"We are very appreciative of the efforts of the PA staff. They are knowledgeable and have provided us some much needed support in 2014 with special projects related to migration projects that required block modifications. This assistance upfront in the process enabled us to submit requests and avoid rework. Thank you to the entire PA staff for the outstanding support in 2014."

"Perfect customer service to the Carriers."

"I feel the PA does a very good job in meeting the needs of all their clients. Every PA that I have come in contact with has always been responsive and professional. Working with PA's I have always found them to be polite, businesslike & prompt. Just really dislike the once a week report delay for block returns. This really needs to change. Whenever we have dealt with the PA, they have been very helpful and courteous."

"I have always received prompt and courteous service from my PA. They always go over and above the level of assistance asked."

"When I need assistance from the PA I always get rapid, courteous, and helpful responses."

"The PA provided help/information requested and guidance with issues raised by this agency."

"Training I received was quite useful."

"I have had the most positive experience with the PA. All of my questions were answered in a timely fashion and in a positive manner."

See Appendix D for 2014 PA Survey Respondents and Appendix E for 2014 PA Survey Respondents' Comments

Section 5.0 Operational Review

The NOWG members met with the PA representatives in Concord, California on March 31 and April 1, 2015, to conduct the annual on-site operational review. During this review, the PA staff presented an overview and highlights of 2014 activities. The presentation included the Pooling Administration operations, Pooling Administration System (PAS), external relations and training, change orders, pooling quality assurance, and regulatory compliance. ==The presentation also included the RNA operations and this activity is covered in Section 9.0.==

Key highlights presented to the NOWG included:
- Total Applications Processed in 2014:
  - Issued 139,181 Part 3s, which was the highest quantity of Part 3s processed since the start of Pooling
  - Assigned 50,440 thousands-blocks
  - Opened 3,381 NXX codes
  - Processed all but one application within 7 calendar days or less
- Customer Support Desk received 1,118 calls and 100% were answered within one business day
- Issued quarterly pooling tips
- Authorized to reclaimed 21 blocks in 2014
- Voluntary Donations
  - Excluded to Optional Rate Centers
    - PA sent out requests for donations in 86 rate centers and received donations in 66 rate centers
  - Optional and Single Service Provider Rate Centers
    - Voluntary donations requested in 7 rate centers and received donations in 4 rate centers
- Trouble Tickets:
  - Opened and closed 6 new trouble tickets
- Abandoned Blocks/Codes:
  - New block holders were located for 1,832 bocks
  - New code holders were located for 78 codes
- Mass Modifications
  - 31,960 blocks modified from 104 spreadsheets entered into PAS
  - 2,740 codes updated in PAS from 23 spreadsheets from NANPA
- Reporting:
  - The following reports were all submitted on time:
    - 595 reports for the FCC, states, NANC, NANPA, and service providers
    - 62 ad hoc reports, all of which were provided in less than one business day (contract allows three business days)
    - 119 Contract Data Requirements List (CDRL) reports
    - 46 additional contract required reports

See Appendix F for 2014 PA Operational Review Presentation and Appendix G for 2014 PA Highlights

Section 6.0   Pooling Administration System (PAS)

The Pooling Administration System (PAS) was available 99.98% of the time in 2014. The PA used a total of 4 hours and 39 minutes of scheduled, approved downtime to complete six maintenance events. PAS was also unavailable for a total of 2 hours and 3 minutes due to 3 instances of unscheduled downtime.

Overall, the industry seemed satisfied with the performance of PAS in 2014; no criticisms or enhancement suggestions were provided in the industry responses to the performance survey.

Building upon an effort started in 2013, the PA team continued development of the enhanced PAS in 2014. Multiple PA team members were responsible for writing requirements for all of the existing functions of PAS as well as new proposed functions and enhancements. The PA team produced more than 100 documents totaling more than 1,300 pages in this effort. Each document was reviewed by a second PA team member, and in some cases, even a third PA team member.

Throughout 2014, the PA team continued to update and modify requirements as the new PAS functionality was being developed, and tested the new functionality as it was completed. The PA team members created user testing procedures, tested extensively, and provided necessary feedback to the developers as needed. All of this was conducted while the PA team members continued to perform their daily tasks. Testing assignments were distributed throughout the team to accommodate daily workloads, vacation schedules, and illnesses of team members. The new enhanced PAS development and testing was completed in 2014, for release in January 2015.

Section 7.0 Change Orders

In 2014 no new change orders were filed by the PA with the FCC. The PA change order process complies with FCC contractual requirements. The following change order, which was approved by the FCC in 2012, remained to be implemented in early 2015:

- Enhancement of the FTP Interface with the Pooling Administration System (Change Order 24) was partially implemented on July 19, 2013. The remainder of this change order is scheduled to be implemented in January 2015 with the roll out of the new PAS.

See Appendix H for 2014 PA Change Order Matrix Log

Section 8.0   National Pooling Website

The website maintained by the PA provides number pooling information to service providers and regulatory agencies. In 2014, the PA continued to keep the information current on the website.

There were no new training videos created or published in 2014; however, the current videos on the PA website continued to be viewed regularly. The most popular video is "New to Pooling Quick Start," which accounted for 50% of the views. There were 224 views of these videos in 2014. The training videos can also be downloaded from the PA website.

Overall, the industry appeared satisfied with the website.

Section 9.0 p-ANI (pseudo-Automatic Number Identification) / RNA (Routing Number Administrator)

The PA, in its second full year administering p-ANIs as the permanent Routing Number Administrator (RNA), continued a major work effort to reconcile p-ANI data discrepancies found during the initial reporting period. Discrepancies had been found where no p-ANI user reported on a p-ANI range that the assignor reported as assigned, and where more than one carrier reported on the same p-ANI range or part of a p-ANI range. Of the 4,561 p-ANI ranges initially identified with data discrepancies, only 58 p-ANI ranges remained to be resolved at the end of 2014. The RNA also worked diligently to resolve duplicate and overlapping p-ANI ranges that were identified. At the end of 2014, of the 287 sets of overlapping p-ANI ranges found, only one set remained to be resolved.

In addition to the data reconciliation work, the PA's RNA functions in 2014 included, but were not limited to, the following:

- Processed 22,781 applications (Part 3s issued), with 99.99% of those applications processed on time
- Assigned 3,810 new p-ANI ranges
- Modified 9,780 existing p-ANI ranges
- Processed 9,124 returned p-ANI ranges
- Maintained the Routing Number Administration System (RNAS) with 99.98% availability, as well as the p-ANI website
- Continued to participate and hold a leadership position in the Emergency Services Interconnection Forum (ESIF), and participated in Industry Numbering Committee (INC) meetings to offer subject matter expertise
- Processed carriers' annual p-ANI reports and semi-annual forecasts
- Completed and posted the 2014 p-ANI Activity and Projected Exhaust Report
- Issued p-ANI Tips of the Month and Quarterly Tips to registered RNAS Users

All of the work activities noted above, along with other RNA and customer service functions, were performed primarily by the two PA staff personnel who are dedicated resources for p-ANI Administration.

Overall, the industry was satisfied with the PA's RNA functions. This is apparent in the majority of responses received in both the quantitative sections and written comments sections of the NOWG's RNA Survey. Following is a sample of comments received on the survey:

"Always very responsive, helpful and fast."

"When requesting new ranges of numbers RNA requires an FCC license for the market. The FCC website makes it difficult to find these licenses and [*Names*] are extremely helpful in getting the correct FCC licenses from the website."

"any questions or issues have been taken care of, explained. only during confirming our data but assistance was great."

"Thank you for providing the information and resources to the Local Government 9-1-1 PSAP / Coordinators. This information is most useful to our profession…"

"[*Names*] are extremely helpful and very nice to work with! They go out of there way to assist me. I was new to requesting information from them in 2014, and they were so very helpful each and every time I had questions. I have had only positive experiences with both of them!"

"In our experience, the RNA representatives were courteous, professional and effective. Their responses were always timely with clear explanations…"

The survey also contained comments from one respondent who suggested changes to the RNA's processes, including the following:

"The PA format still needs to include pANI assignments for PSAPs with multiple ESNs as well as PSAPs with different ESNs to different S/Rs..."

"…PSAPs with wireless ESNs have different S/Rs based upon the transition from legacy to NG and we need to have the ability to accurately assign and document these multiple variations and ensure that over pANI provisioning does not occur thus ineffectively using the pANI pools."

See Appendix I for 2014 RNA Survey Respondents and Appendix J for 2014 RNA Survey Respondents' Comments

Section 9.1 RNA Survey Ratings – Quantitative Analysis*

The following quantitative results were included in the PA Performance Review Methodology for 2014.

The RNA 2014 Performance Survey was completed by a total of 17 respondents. The respondents were comprised of 16 Industry and Other respondents and 1 State Regulatory Commission respondent.

Respondents provided a rating for one question in each section. Following are the aggregated response ratings:

- Routing Number Administrator (RNA)
  - 10 as Met
  - 1 as Not Met

- Routing Number Administration System (RNAS)
  - 9 as Met
  - 1 as Not Met

- RNA Website
  - 12 as Met
  - 1 as Not Met

- RNA Industry Activities
  - 9 as Met
  - 0 as Not Met

- Overall Assessment of the RNA
  - 14 as Met
  - 1 as Not Met

* The aggregated results do not include the "N/A" responses.

See Appendix K for 2014 RNA Survey Metrics and Bar Charts and Appendix L for 2014 RNA Survey Cover Letter and Performance Survey

Section 10.0   Conclusion and Recommendation

The NOWG based its 2014 PA Performance Evaluation Rating on PA and RNA documentation, information collected, and observations throughout the review period year. For the 2014 performance evaluation rating, the NOWG considered PA and RNA activities that included interaction with the NOWG and NANC, active participation at INC and other industry forums, the PA's ongoing consistency in addressing and resolving issues brought to their attention, and suggestions made by the NOWG throughout the calendar year.

The 2014 survey results revealed a high level of client satisfaction with the continued professionalism and expertise exhibited by the PA personnel when performing their PA and RNA duties. The PA continued to demonstrate their ability to handle the large volume of block applications, while simultaneously completing special projects.

The NOWG reviewed all aspects of the PA activities, as well as the feedback from service providers and regulators, and determined that the PA consistently performed very well in all areas of their responsibilities in 2014. As a result of the analysis, the NOWG gave the PA a "**Met**" rating for the 2014 performance year.

The NOWG makes the following recommendations for the PA's consideration in 2015:

- Continue to have internal training sessions with the PA and RNA personnel to ensure consistency in understanding the processes when responding to service providers and regulators.

- Consider enhancing the current process for PAS Suggestions by creating a standardized form for suggestion submissions and distributing a notice to PAS users of the new PAS Suggestion form.

- Propose an issue to INC to increase the frequency of requesting the Contamination Report from the NPAC for the purpose of approving or denying block returns.

- Continue to provide high quality service to the industry.

Section 11.0   Acknowledgements & NOWG Participants

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

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> Jan Connally
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> Kevin Gatchell
> Linda Hymans
> Jeremiah Jenkins
> Wayne Louie
> Cecilia McCabe
> Amy Putnam
> Shannon Sevigny
> Florence Weber
> Gary Zahn
> PA/p-ANI Help Desk and Pooling/p-ANI Administrators

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

Company	Participant
AT&T	Linda Richardson
CenturyLink	Jan Doell
Charter Communications	Holly Kuester
Cox Communications	Beth O'Donnell
Pennsylvania PUC	Christopher Hepburn
Sprint	Rosemary Emmer
Sprint	Shaunna Forshee
Sprint	Karen Riepenkroger
T-Mobile USA	Cathie Capita
Verizon Communications	Laura Dalton
Verizon Wireless	Dana Crandall
XO Communications	Ruben Galvan

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