

SomosGov, Inc.

as the

North American Numbering Plan Administrator

Contract #273FCC21C0003

Change Order Proposal IA-2

(INC Issue 961 -

Update ATIS-0300119 Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG) To Require NANPA/PA To Obtain NPAC Reports Each Business Day)

July 29, 2024

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1 Introduction

1.1 Purpose

In accordance with the terms of Contract No. 273FCC21C0003 ("Contract") between the FCC and SomosGov, Inc. ("NANPA"), dated December 1, 2020, NANPA hereby submits this change order ("Change Order IA-2") proposal to the FCC. This change order is submitted pursuant to Section 2.8 (Modification of Guidelines), Combined NANPA/PA Technical Requirements Document, Attachment 1.1, to the Contract.

1.2 Modification of NANPA Scope of Work

Pursuant to the Contract, the NANPA shall participate in the development and modification of the Industry Numbering Committee (INC) guidelines and procedures, which may or may not affect the performance of the NANPA functions. These changes may be derived from regulatory directives and/or industry-initiated modifications to guidelines. In addition, new guidelines may be developed as appropriate to comply with regulatory directives.

When the Industry Numbering Committee (INC) places any changes to its guidelines in initial closure, the NANPA shall submit an assessment regarding the impact of scope of work, time, and costs to the FCC and the NANC or its designee within 30 days. A copy of the change order with the costs redacted shall also be sent to the INC.

2 Proposed Scope of Work Change

During the INC 187 meeting, INC Issue 961 was resolved and moved to Initial Closure on July 5, 2024. Changes resulting from this issue affects the NANP Administration System ("NAS") and NANPA operations.

The official INC issue statement is copied in its entirety below, including the INC agreed upon resolution. The INC issue can be found on the Alliance for Telecommunications Industry Solutions (ATIS) website.

INC Issue 961: Update ATIS-0300119 Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG) To Require NANPA/PA To Obtain NPAC Reports Each Business Day

<u>Issue Statement/Business Need:</u>

Today NANPA submits a request for an ad hoc report from the NPAC to determine contamination and the presence of LRNs when 1) thousands-blocks or CO codes are returned or abandoned, or 2) thousands-blocks available in the pool are identified as being overcontaminated (greater than 10%). The NANPA has been authorized to obtain these ad hoc NPAC reports once a week under permission previously granted by the North American Portability Management LLC (NAPM LLC).

The NPAC ad hoc reports contains the following data: 1) the total quantity of ported numbers within the thousands-block or CO code, 2) the total quantity of ported numbers within the thousands-block or CO code subtotaled by Service Provider ID (SPID), and 3) the quantity of Location Routing Numbers (LRNs) contained within the thousands-block or CO code.

The volume of situations where NANPA needs to request these ad hoc reports appears to be growing. If NANPA were permitted to request these ad hoc reports each business day (as needed), rather than just once a week, it would simplify NANPA's processes, allow for more timely processing of thousands-block and CO code returns, and potentially add eligible thousands-blocks to the pool more quickly.

Suggested Solution

INC should request that the NAPM LLC allow the NANPA to request NPAC ad hoc reports each business day as needed, rather than only once a week. If the NAPM LLC approves the request, INC should then modify the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines to require NANPA to request such ad hoc NPAC reports within one business day of the need.

Resolution Statement:

INC agreed to update ATIS-0300119, Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG) To Require NANPA/PA To Obtain NPAC Reports within five calendar days, as shown in INC-2024-00088R001. The NANPA shall send the request to the NPAC on Tuesdays and Thursdays as jointly agreed to by ATIS INC, NPIF (Number Portability Industry Forum), and the NAPM LLC. The resolution of this Issue will generate a NANPA Change Order. This Issue will remain in Initial Pending status until the approval and implementation of the Change Order.

3 Proposed Solution

As a result of INC Issue 961, NANPA will request an ad hoc report from the NPAC within five calendar days of receiving a CO code disconnect, thousands-block disconnect and upon receiving direction from the appropriate regulatory authority to reclaim abandoned CO codes and thousands-blocks. In addition, NANPA will adjust the timing of the weekly ad hoc report request to NPAC from Wednesdays to Tuesdays and Thursdays as agreed to by ATIS INC, NPIF, and the NAPM LLC.

4 Assumptions and Risks

NANPA is required to identify the associated assumptions and risks that can have an impact on its operations as part of its assessment of this change order.

Assumptions:

Upon receiving written FCC approval of this change order and only after the new NANP Administration System launches on October 28, 2024, NANPA will request the additional ad hoc report from the NPAC and adjust the timing of the ad hoc report request from Wednesdays to Tuesdays and Thursdays.

Risks:

NANPA did not identify any risks associated with this change order.

5 Cost

To implement INC Issue 961, the cost for the additional ad hoc report per week per NPAC region is subject to a Direct Charge as defined in Exhibit E of the Master Services Agreement and in Exhibit E of the regional NPAC/SMS PTRS User Agreements (PTRS CE-4). This change order will include this cost for the duration of the base period of the NANPA contract including the three one-year option periods. The cost for the remaining base period of the NANPA contract shall not exceed \$X. The cost for each option period shall not exceed \$X.

6 Conclusion

NANPA respectfully seeks the FCC's approval for this scope of work change. Upon approval by the FCC, NANPA will notify the industry on the timing of when the change order will be implemented.