

NANC

**2011
PA
Performance
Evaluation
Report**

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

May 15, 2012

2011 PA Performance Evaluation Report

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Executive Summary

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

- 2011 Performance Feedback Survey
- Written comments and reports
- Annual Operational Review
- NOWG observations and monthly interactions with the PA

The PA's rating for the 2011 performance year was determined by the NOWG to be **More Than Met**. This rating is defined below:

MORE THAN MET	Met and often went beyond performance requirement(s) <ul style="list-style-type: none">• Provided more than what was required to be successful• Performance was more than competent and reliable• Decisions and recommendations usually exceeded requirements and expectations
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The 2011 survey results revealed a high level of satisfaction that respondents attributed to the professionalism, responsiveness, and expertise exhibited by the PA personnel throughout 2011.

In 2011, the PA consistently provided more than what was required of their responsibilities. Highlights included:

- The PA processed a record-high 132,429 applications (Part 3s) which was a 29.4% increase from 2010.
- The PA reported a high degree of utilization of the online training videos.
- The PA maintained a 99.998% availability of PAS in 2011. This included the implementation of two change orders and two maintenance builds.
- The PA completed the NPAC scrub project in 2011. At the start of 2011 there were 279 blocks still needing to be resolved. The PA worked with the appropriate state regulators and was able to resolve 100% of the remaining blocks.
- PA continued the "Seeking Donations" project in 2011 and was successful in securing donations for 66 rate centers, changing the status from "excluded" to "optional". There were 16 codes saved in 2011.

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Section 1.0 Performance Review Methodology

The annual PA Performance Evaluation is a summary of significant events that were accomplished during the 2011 performance year. In addition to the annual performance review survey process, the NOWG interactions with the PA included the following:

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

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

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

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The following chart provides the definition of each rating category:

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

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

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Section 2.0 PA Reports

2.1 PA Annual Report

The 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. Review of this annual report is part of the NOWG's annual performance review process. At a minimum, the annual report is required to contain the following information:

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

Prior to this year's on-site operational review, the PA provided the NOWG with an opportunity to review the draft copy of their 2011 annual report. During the on-site operational review in Concord, California in March 2012, the PA staff reviewed the 2011 highlights which were also included in their annual report.

Overall, the annual report provides a comprehensive snapshot of pooling and the Pooling Administrator for 2011. The PA 2011 Annual Report was filed with the FCC and is posted for general availability on the PA's website at www.nationalpooling.com.

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2.2 PA NANC Report

The PA reported its monthly numbering activities to the NANC and the NOWG. Additionally, the PA made presentations at the NANC meetings in March, May, September, and December 2011, reporting the status of thousands-block pooling administration, p-ANI (pseudo-Automatic Number Identification) activities, and events affecting the performance of the PA, which included the following:

- Volume of pooling assignments, donations and applications processed
- Blocks opened to replenish pools and establish LRNs
- Pools with less than six months inventory vs. forecasts
- Summaries of monthly reports to the FCC
- Number of blocks reclaimed
- 99.998 percent availability of PAS
- Status and implementation of change orders
- Updates to PAS
- Updates to the PA website
- Results of the 2011 Pooling Administration Survey

2.3 NOWG Monthly Reports

Throughout 2011, 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.

See Appendix A for the Standing Agenda.

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Section 3.0 Customer Focus / Issues Log

Customer Focus

In 2011, 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 54 customer focus items from January 2011 through December 2011. 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 individual, regulatory and website training
- Provided help desk availability over the hurricane weekend

PA/NOWG Issues Tracking Log

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

There was one new issue added to this log in 2011 that is related to donations over 10% contaminated. This issue remained open at the end of 2011, as it was being worked in conjunction with the Industry Numbering Committee (INC).

See Appendix B for the Issues Tracking Log.

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Section 4.0 2011 Performance Survey Results

4.1 Survey Ratings – Quantitative Analysis

The PA 2011 Performance Surveys were completed by a total of 70 respondents:

- 40 Industry and Other Respondents
- 30 Regulator Respondents

The results are as follows:

- Pooling Administrator (Section A)
 - There were four questions in this section to which respondents provided the following aggregated response ratings:
 - 92 as Exceeded
 - 71 as More than Met
 - 20 as Met
 - 3 as Sometimes Met
- Implementation Management (Section B)
 - There were two questions in this section to which respondents provided the following aggregated response ratings:
 - 16 as Exceeded
 - 23 as More than Met
 - 15 as Met
 - 2 as Sometimes Met
- Pooling Administration System (PAS) (Section C)
 - There were three questions in this section to which respondents provided the following aggregated response ratings:
 - 68 as Exceeded
 - 76 as More than Met
 - 25 as Met
 - 1 as Sometimes Met
- PA Website (Section D)
 - There was one question in this section to which respondents provided the following aggregated response ratings:
 - 29 as Exceeded
 - 31 as More than Met
 - 8 as Met

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- Miscellaneous Pooling Administration (PA) Functions (Section E)
 - There were four questions in this section to which respondents provided the following aggregated response ratings:
 - 79 as Exceeded
 - 102 as More than Met
 - 35 as Met

- Overall Assessment of Pooling Administrator (PA) (Section F)
 - There was one question in this section to which respondents provided the following aggregated response ratings:
 - 34 as Exceeded
 - 32 as More than Met
 - 3 as Met

See Appendix C for Numerical Survey Results and Bar Charts, and Appendix D for the Cover Letter and 2011 PA Performance Survey.

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4.2 Written Comments

The survey allowed respondents the opportunity to provide detailed written comments regarding their satisfaction or dissatisfaction with the PA's performance in 2011. 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.

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:
 - Provides a high level of support, assistance, and guidance
 - Always professional, informed, and courteous
 - Responsive, helpful, and thorough
 - Goes above and beyond to satisfy their customers
- Comments suggesting improvements were mostly isolated. Comments pertained to:
 - Some inconsistencies among PA representatives in accuracy and timeliness of information provided
 - PAS limitations and suggestions for system augmentations

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

“Pooling Administrator and staff have been excellent to work with.”

“Pooling Admins have always been helpful and we have nothing negative to say.”

“Blocks requested were processed under the seven calendar days. Great job!”

“PAs processed the Requests well in advance of the 7 day period. The Pooling Administrators are continuously prompt in their responses to emails along with the deliverance of required forms.”

“The PA administrators are always very helpful in solving any issue that may come up. If they were unable to assist they would find out where I needed to go for resolution. All very professional to work with.”

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“Help desk does a great job, if the person answering doesn't know the answer they find out. Pooling Tips seem to be intended for the more novice user, which is probably appropriate. When I've had questions for the PA, I've always received answers to my inquiries in a prompt and professional manner. There have been times when answers needed to be researched, but the PA's have always come back with answers in a timely manner. I very much appreciate the accuracy and thought they put in to resolving issues as well!”

“The combination of accurate and timely information with exceptional real-time support is appreciated.”

“Every inquiry I submitted was promptly responded to with a complete answer. Requests for a state waiver to process numbering requests were quickly and satisfactorily resolved.”

“Being new to Numbering I had to rely solely on NEUSTAR personnel during 2011 to help me learn and perform my responsibilities. Absolutely everyone I called on was very professional and most willing to help me accomplish my job duties.”

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

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Section 5.0 Operational Review

The NOWG members met with the PA representatives in Concord, California on March 7 and 8, 2012 to conduct the annual on-site operational review. During this review, the PA staff presented an overview and highlights of 2011 activities. The presentation included the Pooling Administration operations, NANP resource trending, external relations and training, change orders, pooling quality assurance, and regulatory and compliance.

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

Some of the key highlights presented to the NOWG included:

- Total Applications Processed in 2011:
 - issued a record high 132,429 Part 3s (this was a 29.4% increase from 2010)
 - assigned 52,059 thousands blocks
 - opened 2,774 NXX codes
 - 100% of all applications processed within seven calendar days or less (requirement is 97%)
- Customer Support Desk received 2,537 calls; 100% answered within one business day
- Trouble Tickets:
 - opened and closed four new trouble tickets in 2011
 - closed one trouble ticket carried over from 2010
- Reclaimed 10 blocks in 2011
- PA conducted their 2011 survey with service providers and received over 100 survey responses. The survey resulted in an overall average score of 4.6 out of a possible 5.0 based on 24 questions.
- Training:
 - conducted web based training session for state and federal regulators
 - added two new training videos on the PA website in 2011
 - training videos on the PA website were regularly viewed throughout 2011 with the videos being accessed 421 times
 - conducted ongoing internal training including sessions on M&Ps, guidelines, and database enhancements
- In 2011, the PA continued a 2010 project of seeking additional donations in rate centers that went from Excluded to Optional. The 2011 efforts netted donations in 16 rate centers out of 25 rate centers where donations were requested.
- In 2011, the PA successfully completed the NPAC scrub project by resolving the remaining 279 over-contaminated blocks.
- Provided reports to the FCC, state regulators, NANC, NANPA, and NOWG

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- Implemented two overlays in PAS in 2011
- Facilitated one Supplemental Implementation Meeting for Mississippi in 2011
- Implemented PAS releases for two changes orders, two maintenance builds, and two for system maintenance
- Participated in 80 industry meetings: NANC, INC, CIGRR, FoN, NRRIC, LNPA-WG, and ESIF-ECDR (Emergency Services Interconnection Forum – Emergency Call and Data Routing)
- No formal complaints made to PA
- Met or exceeded all system requirements with 99.998% availability – exceeding the contract performance metric of 99.9% availability

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

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Section 6.0 Pooling Administration System (PAS)

The Pooling Administration System (PAS) was available 99.998% of the time during 2011 – even during implementation of two change orders and two maintenance builds. Also, PAS did not experience any unscheduled downtime during 2011.

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

- Regulatory users (both state and FCC users) now have access to the *Assignments Needing Part 4s Report*. State users are limited to only the assigned blocks within their respective state. FCC users have access to all assigned blocks requiring a Part 4.
- A new *NPA/Rate Center Report for All States* was added to the pooling website under *Reports*. This new report includes all states and all NPAs and is downloadable to Excel and is updated nightly.
- The *Donation Report* now has “From” and “To” date range fields to allow users to search for donations for a specified time period.
- A new validation has been added to PAS for Inter OCN (Block Transfer) block modifications to determine if the request is considered initial. If the request is considered initial, the confirmation screen was modified to notify the Service Provider /Service Provider Consultant (SP/SPC) user that the user will need to send appropriate supporting documentation to the PA. The PA Part 3 screen was also modified to notify the PA that the requested block modification is an initial request.
- PAS will now use the LERG 1 OCN Name (50 characters) rather than the LERG 1 Abbreviated OCN Name (20 characters). This is to reduce SP confusion and questions when both the parent company name and the “DBA” company name are part of an OCN name. All historical information will continue to show the abbreviated OCN Name (20 characters). This will also be consistent with what is being used in the NANP Administration System (NAS) today to populate the OCN Name.
- The Central Office Code (NXX) Assignment Request – Part 4, Central Office Code (NXX) Assignment, Request – Part 4-PA and the Thousands-Block Pooling Assignment Guideline (TBPAG) Thousands-Block (NXX-X) Confirmation Form Part 4 have all been updated with the new text contained in INC Issue 696 (*Clarify the Definition of “in Service” in the Guidelines*).

The PA successfully completed technical disaster recovery testing in two phases in 2011, on October 21st and December 8th. Testing included switching PAS to the backup site in Charlotte (NC) and returning it to the main location in Sterling

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(VA) as well as other tests designed to ensure PAS ability to re-establish the PAS Operating System and applications in the event of a catastrophic failure.

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

“The PAS reports are our primary tool in monitoring numbering usage in [state] and assists us in identifying any specific activity that requires closer examination.”

“The PAS is generally user friendly and has data that is useful in my work to monitor the use of numbering resources.”

“Very satisfied with how PAS system performed.”

However, there was an incident with regards to determining if PAS or the user’s web interface was causing the issue:

“Another problem was that PAS was not providing drop down information and multiple [service provider] user’s were calling the issue and only told that the issues resided on our end which to my knowledge the issue was infact on Neustar’s end. We had reported an issue of not being able to view the drop down menus in PAS. We were told it was something within our IT and as it turned out after some research it was discovered that a new security patch was released by Microsoft for Internet Explorer that was causing the issue. When I contacted Neustar regarding the issue I was a little too quickly told it was within [service provider]. I was able to get [service provider] IT to give me a work around so that I could continue my work in PAS.”

There were some enhancement suggestions as well:

“In a great many cases now the numbering pools are starting to be empty. Any way to compile a master list of these and keep it out there on the site instead of having to go to the RC only to find out it is empty. Just some kind of an easier way to find this.”

“When submit donations in PAS, the NPA and OCN field have to be entered each time a block is donated to the pool. Can the fields be defaulted once the NPA and OCN are identified? This way, it saves time to enter the fields when there are more than one NXXs-Xs to be donated with the same NPA and OCN.”

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Section 7.0 Change Orders

In 2011, the PA filed four new change orders with the FCC. The PA change order process complies with FCC contractual requirements. The 2011 change orders included:

- Permanent Routing Number Administration (Change Order 19)
- Proposed Enhancements to PAS (Change Order 20)
- INC Issue #710 – NANC Action Item “multi-OCN Issue” (Change Order 21)
- INC Issue #698 – Auto-Populate Total Numbering Resources on TBPAG MTE Form (Change Order 22)

After submission of Change Order 21, the PA considered an alternate solution recommended by the NOWG and submitted a revised Change Order 21.

In 2011, the PA completed the implementation phase of two change orders approved by the FCC.

See Appendix I for the Change Order Matrix.

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Section 8.0 National Pooling Website

The website maintained by the PA provides number pooling information to service providers and regulatory agencies. In 2011, the PA continued to keep the information current on the website.

The training videos on the website continue to be viewed regularly. In 2011, the PA added two new training videos to the website – PAS Effective Date Scenarios for Block Requests in July and Donations and PAS Password Reset in October. The PA also conducted one web-based training session in 2011 for service providers and regulators.

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

“The website is user friendly and contains useful information.”

“Nice job on maintaining the website.”

“Excellent and easy to use web site. All needed information is at fingertips!”

The NOWG commends the PA for their user-friendly and informative website.

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Section 9.0 p-ANI (pseudo-Automatic Number Identification)

The PA continued to serve as the Interim Routing Number Administrator (IRNA) for p-ANI in 2011. There was one Emergency Service Query Key (ESQK) registration and 41 ESQK requests received in 2011.

As a result of the FCC's approval of Change Order 19 in June, the PA began development of the permanent p-ANI administration system (RNAS - Routing Number Administration System). The PA's development work included but was not limited to the following:

- Website generation
- Received and reviewed data from assignors and assignees of all p-ANI assignments already in existence
- Development of a tool to assist users in cross-referencing the data
- Worked with the assignees to resolve discrepancies
- Tested system components
- Re-worked some system requirements

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

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Section 10.0 Conclusion and Recommendation

The NOWG based its 2011 PA Performance Evaluation Rating on documentation, information collected, and observations throughout the review period year. Although emphasis continues to be given to the numeric and written survey comments, survey respondents may not always be familiar with the activities of the PA that occur “behind the scenes.” For the 2011 performance evaluation rating, the NOWG considered PA activities that included interaction with the NOWG and the NANC, and active participation at INC and other industry forums.

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

In reviewing the rating criteria for the PA, the results of the data analysis yielded a “More Than Met” rating for the 2011 performance year.

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

- Continue to review internal training processes to ensure that consistency in understanding the processes and responding to service providers is communicated to the PA personnel.
- Ongoing review of the website to ensure accuracy and timeliness of data.
- Work with the NOWG on determining the feasibility of automating Telcordia BIRRDs entries of BCD screen data elements (new entries, disconnects, modifications, etc...).

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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 with participating in the NOWG's monthly meetings.

List of PA Participants

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

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

List of NOWG Participants:

<u>Company</u>	<u>Participant</u>
AT&T	Linda Richardson
CenturyLink	Jan Doell
Cox Communications	Beth O'Donnell
EarthLink Business	Linda Peterman
Pennsylvania PUC	Christopher Hepburn
Sprint Nextel	Rosemary Emmer
Sprint Nextel	Karen Riepenkroger
T-Mobile USA	Natalie McNamer
Verizon Communications	Laura Dalton
Verizon Wireless	Gwen Zahn
Windstream Communications	Michelle Bowyer
Windstream Communications	Paula Hustead
XO Communications	Ruben Galvan

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Section 12.0 List of Appendices

- Appendix A 2011 PA / NOWG Standing Agenda
- Appendix B 2011 PA / NOWG Issues Tracking Log
- Appendix C 2011 PA Survey Metrics and Bar Charts
- Appendix D 2011 PA Survey Cover Letter and Performance Survey
- Appendix E 2011 PA Survey Respondents
- Appendix F 2011 PA Survey Respondents' Comments
- Appendix G 2011 PA Operational Review Presentation
- Appendix H 2011 PA Highlights
- Appendix I 2011 PA Change Order Matrix Log