



Change Order #41 Summary Report October 2006

By the acceptance of Change Order #41, the FCC directed the national Pooling Administrator (PA) to perform a one-time scrub of the entire PAS database to reduce the likelihood that carriers will receive over-contaminated blocks, or incorrectly identified contaminated blocks in lieu of pristine blocks. Upon approval of that change order, the PA developed a project plan and timeline and began the process, which ultimately took over five months to complete.

At the beginning of the project, there were 189,552 thousand-blocks available in PAS. As a first step, the PA queried the Pooling Administration System asking for information for all currently available or pending blocks, including NPA, NXX-X, and contamination status.

The PA provided the list of those blocks to the NPAC in order to determine the contamination level for each block. Once the NPAC provided the PA with the results, the PA compared the NPAC data against the block contamination status in PAS. Out of the 189,552 available blocks, 10,758 (5.68%) resulted in a discrepancy, which meant that either PAS was incorrect or the NPAC was incorrect. Also, out of the 10,758 available blocks, there were 506 blocks that appeared to be over 10% contaminated.

Overall, 787 distinct OCNs were affected. The PA spent several months contacting each carrier to determine if the data in PAS or in the NPAC needed to be updated, researching the legal viability of carriers that did not respond, negotiating between carriers for the disposition of over-contaminated blocks. In cases where the PA received no responses from a carrier, the PA contacted the state regulators for assistance.

Ultimately, the blocks were updated in either PAS or the NPAC. Out of the 10,252 available blocks, 89% of those blocks had an incorrect contamination status in PAS, which the PA updated on the carriers behalf; and the remaining 11% of those blocks were incorrect in the NPAC, which the carrier updated. Out of the 506 blocks that appeared to be over 10% contaminated, roughly half of those blocks were removed from the pool, while the remaining blocks were updated with the correct contamination status in PAS.

Also, the PA received several explanations from carriers for why there was a discrepancy between PAS and the NPAC. These included:

- Lack of communication between the carriers' departments;
- The SPs did not realize they needed to do intra-SP ports prior to donating blocks;
- The SPs did not have a process in place to notify the PA when the contamination status of a previously donated block goes from contaminated to non-contaminated;
- Some SPs mistakenly believed that updating NRUF automatically updated the NPAC; and



- Some SPs thought they could donate the block even though it was over 10% contaminated, if the numbers were ported to another carrier.

In conclusion, this project took approximately five months to complete, and required several PA personnel to contact carriers and work with them on correcting the discrepancies in PAS and in the NPAC.

PA Change Order #41 includes a recommendation that, “[o]ne year after the reconciliation has been completed; the NOWG and the PA will seek input from the industry as to any increase or decrease in the frequency in which SPs are encountering erroneous block contamination.” We will work with the NOWG on this matter, and this information will be used to determine if the PA needs to conduct another PAS and NPAC reconciliation.