

Effects of the FCCs NRO Order on Code Administration

The purpose of this document is to make a potential applicant for Central Office Codes aware of certain provisions in the FCC Numbering Resource Optimization Order (“NRO Order”), which has been in effect since July 2000. These provisions affect the submission and processing of applications for central office codes.

Listed below are changes in effect to the procedures for central office code applications and assignments.

1. Applications for central office codes are to be submitted in accordance with the Central Office Code (NXX) Assignment Guidelines, which may be found on the ATIS website at <http://www.atis.org/inc/incguides.asp>.
2. The NRO Order requires an applicant to have an NRUF Form 502 on file with NANPA for each NPA (for non-pooling area codes) and for each rate center (for pooling area codes) in which the applicant is requesting central office code assignments. An NRUF for the current reporting cycle (February 1 and August 1 for every year) must be on file with NANPA in order for the service provider to receive numbering resources.
3. When requesting the initial assignment of a central office code, the applicant must include with the Application the following information:

- a. License and/or Certification

Evidence that demonstrates the SP has a license or authority issued by the FCC or a Certificate of Public Convenience and Necessity (CPCN) issued by a State Regulatory Body to provide service in the city and state/rate center/MSA#/RSA#/MTA#/BTA#/national /LATA. The SP may attach a copy of the FCC license or authority or CPCN to the application. In the case that the name on the license or authority issued by the FCC or CPCN does not match the SP’s name on the application, the applicant shall provide documentation linking the name on the application with the name on the license or authority issued by the FCC or CPCN.

- b. Facilities Readiness

Appropriate evidence that facilities are in place or will be in place to provide service within 60 days of the numbering resources activation date (LERG Routing Guide effective date) is required. Evidence shall be provided to the NANPA with the Part 1 application. Evidence may be provided by emailing or faxing to the NANPA via a copy of any one of the following document(s)¹ the SP selects:

- 1) A current executed interconnection agreement between a Local Exchange Carrier and the service provider requesting numbering resources. The relevant pages are the cover page, area covered, the expiration date and the signature page from the interconnection agreement. The

¹ There may be additional or different criteria requested by state regulators. See 47 CFR § 52.15 (g) (4).

SP shall provide only the relevant pages or indicate in the email the page numbers for the relevant pages if providing the entire interconnection agreement. NANPA shall deny any application when the relevant pages are not provided or the SP does not indicate the page numbers of the relevant pages when providing the entire interconnection agreement via email. In the case that the name on the interconnection agreement does not match the SP's name on the application, the applicant shall provide documentation linking the name on the application with the name on the interconnection agreement.

- 2) Documentation of the state commission approval of the current interconnection agreement. In the case that the name on the state commission documentation does not match the SP's name on the application, the applicant shall provide documentation linking the name on the application with the name on the state commission documentation.
- 3) The Service Provider business plan/pre-planning checklist (see Appendix A) to show that facilities for origination or termination for calls being used specifically for the requested code(s) have been requested and are anticipated to be completed in order to provide service within 60 calendar days of the numbering resources activation date (LERG Routing Guide effective date).
- 4) A confirmation letter or letter of intent provided by the LEC with which the requesting SP will interconnect. Interconnecting LECs are encouraged, but not required, to provide such letters. In the case that the name on the confirmation letter does not match the SP's name on the application, the applicant shall provide documentation linking the name on the application with the name on the confirmation letter.
- 5) A letter from the requesting SP identifying a block/code in service in another rate center that already uses the same facilities and CLLI code that will be used to serve the new rate center where the initial code is being requested and reflected on the application. In the case that the OCN name associated with the switch CLLI serving the existing block/code does not match the SP's name on the application, the applicant shall provide documentation linking the name on the application with the OCN name associated with the switch CLLI.

All documentation submitted will be held confidential pursuant to FCC confidentiality rules.^[2]

4. When requesting growth codes, the applicant must complete and submit the Months to Exhaust (MTE) form, which includes utilization calculations. The MTE form submitted must demonstrate that all of the numbers assigned to the applicant in the rate center will exhaust within six (6) months. (The calculation in Line 3 of the MTE form must yield a number less than or equal to 6.0). The NANPA will deny applications that do not meet this criterion. Further, in response to a NANPA inquiry dated February 25, 2002, the FCC restated the requirement that intermediate numbers are to be included in the denominator of the utilization calculation.

In order to receive additional central office codes, the MTE form must show 75% utilization or better. Intermediate numbers may be included in the numerator to the extent that the entity receiving them has assigned them to an end user.* Number resources activated in the Telcordia® LERG™ Routing

^[2] 47 CFR § 52.13 (c) (7)

Guide within the preceding 90 days or reporting utilization levels may be excluded from the utilization calculation.** Number resources are classified in the following number use categories: assigned, intermediate, reserved, aging and administrative. (See FCC 00-104 at 52.15 (1) (i) for more information.)

*The carrier who receives the numbers from NANPA should be prepared to demonstrate that the numbers have been assigned.

**If a carrier chooses to exclude the newly acquired NXX from the denominator, the carrier must also exclude from the numerator any assigned numbers from the newly acquired NXX.

5. NANPA is no longer permitted to extend the time allowed for an applicant to place assigned codes in service. The Part 4 is due within six (6) months of the original effective date returned on the Part 3 and entered on the ACD screen of the Telcordia® Business Integrated Routing and Rating Database System (BIRRDs).
6. If an applicant wants to dispute NANPA's decision to deny a request for an initial or growth central office code, the applicant must contact the appropriate state regulatory commission.