

SomosGov, Inc.

as the

North American Numbering Plan Administrator Contract #273FCC21C0003

Change Order Proposal IA-1

(INC Issue 941 - Update 5XX-NXX Guidelines to Make 5XX-555 Codes Available For Assignment)

December 19, 2022

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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-1") 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 180 meeting, INC Issue 941 was resolved and moved to Initial Closure on December 2, 2022. Changes resulting from this issue affects the NANP Administration System ("NAS").

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 941: Update 5XX-NXX Guidelines to Make 5XX-555 Codes Available For Assignment

Issue Statement/Business Need:

Sections 4.7 and 4.7.2 of the Non-Geographic 5XX-NXX Code Assignment Guidelines indicate that the 5XX-555 central office codes are not assignable, and are reserved to avoid potential routing conflicts for Directory Assistance. This precautionary language is a vestige from when these resources were first designated for personal communications services, and predates two significant Guidelines updates: 1) in 2013, to expand the uses of these resources for machine-type communications, and 2) in 2022 to further clarify that calls to 5XX-NXX codes may not be dialable from the PSTN and may route only within the assignee's network. The concern for potential routing conflicts for Directory Assistance likely never materialized, and is even less concerning now that the primary use of these resources is for machine-type communications.

Under INC Issue 878 in 2019, INC agreed to make 5XX-N11 codes, except for 5XX-911 codes, available for assignment. To ensure the most efficient use of these resources, INC should consider making 5XX-555 codes available for assignment.

Suggested Solution

To ensure the most efficient use of these resources, INC should update the Non-Geographic 5XX-NXX Code Assignment Guidelines to make 5XX-555 codes assignable to service providers. This would make another 15 5XX-NXX codes available for assignment now, as well as another 18 in the 5XX NPAs designated for future Non-Geographic 5XX-NXX services.

Resolution Statement:

INC agreed to update ATIS-0300052, Non-Geographic 5XX-NXX Code Administration Guidelines, with the updates reflected in INC-2022-00083R000. Implementation will be contingent of the approval of a NANPA change order.

3 Proposed Solution

INC Issue 941 proposes changes to the Non-Geographic 5XX-NXX Code Administration Guidelines to allow assignment of the 5XX-555 codes. NAS will be updated to remove the restriction of future 5XX-555 codes and existing 5XX-555 codes will be made available for assignment in the following 5XX NPAs: 500, 521, 522, 523, 524, 525, 526, 527, 528, 529, 533, 544, 566, 577 and 588.

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, NANPA will make the existing non-geographic 5XX-555 codes available for assignment in NAS and send a NANP Notification System (NNS) email announcing its availability.

Risks:

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

5 Cost

The proposed solution for implementation of INC Issue 941 requires minimal changes to NAS. As such, there is no cost associated with this change order.

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 that it is implementing this change order.