**Final Report and Recommendations of the
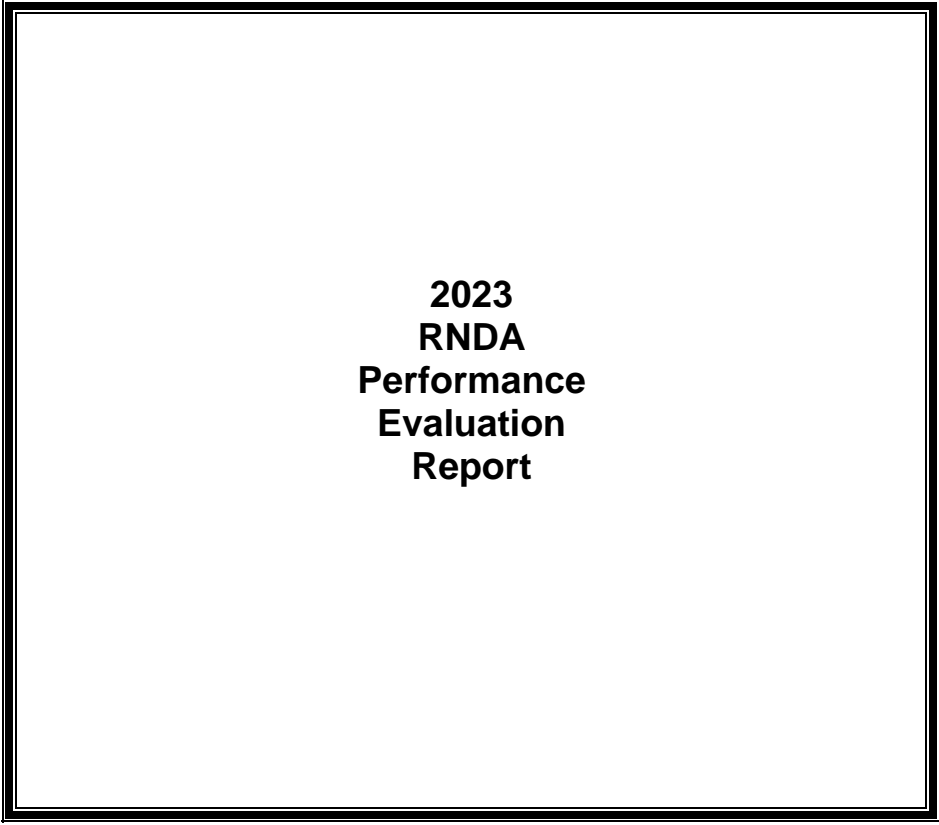North American Numbering Council**

NANC

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**2023
RNDA
Performance
Evaluation
Report**

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**Prepared by the
Numbering Administration Oversight Working Group (NAOWG)**

June 25, 2024

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Executive Summary

The Reassigned Numbers Database Administrator (RNDA) serves under the NANPA contract with the Federal Communications Commission (FCC) to oversee the Reassigned Numbers Database (RND). The RND is a comprehensive database that enables callers to verify whether a telephone number is permanently disconnected and therefore eligible for reassignment, before that number is called. The RNDA's annual performance assessment for calendar year 2023, performed by the Numbering Administration Oversight Working Group (NAOWG), is based upon a compilation of monthly reports and conference calls, quarterly self-assessments, monthly evaluation reports, the RNDA's participation in industry events, observations/interactions between the RNDA and the NAOWG, and performance feedback surveys completed by industry and state regulatory staff. The NAOWG has compiled this data into an annual performance report for the FCC and the North American Numbering Council (NANC).

For the performance evaluation process, the two categories are: Met or Not Met.

The RNDA's rating for the 2023 performance year was determined by consensus of the NAOWG to be **Met**. This rating is defined below:

MET	**Met performance requirement(s)** o Met requirements in order to be considered successful o Performance was competent and reliable o Decisions and recommendations were within requirements and expectations

The Met rating was given to the RNDA for consistency in meeting and often exceeding all requirements related to RND performance.

Throughout 2023, RNDA personnel continued to exhibit their professionalism and expertise while performing RNDA duties and continued to perform at a consistent level of efficiency in the administration of all RND resources. Highlights included:

- Met all of the RNDA's performance measurements and required responsibilities in 2023;
- Provided high quality customer service to Callers (Users), Service Providers, and other stakeholders; and
- Made decisions and recommendations that were within requirements and expectations.

Section 1.0 Performance Review Methodology

The annual RNDA Performance Evaluation is a summary of significant events that were accomplished during the 2023 calendar year. In addition to the annual performance review survey process, the NAOWG's interactions with the RNDA included the following:

- Monthly NAOWG/RNDA oversight meetings
- Monthly FCC/NAOWG/RNDA reports
- Monthly NAOWG evaluation matrix
- Quarterly RNDA self-assessments/reports
- RNDA Annual Report
- Interactions with Callers, Service Providers, and industry

The NAOWG used the same "Met or Not Met" methodology for individual tasks and the overall performance evaluation rating.

The following chart provides the definition of the two rating categories:

Satisfaction Rating	Used when the RNDA...
MET	**Met performance requirement(s)** o Met requirements in order to be considered successful o Performance was competent and reliable o Decisions and recommendations were within add requirements and expectations
NOT MET	**Did not meet performance requirement(s)** o Administrative tasks and objectives were not within requirements in order to be considered successful o Performance was unreliable and commitments were not met o Decisions and recommendations were inconsistent with requirements

Section 2.0   RNDA Reporting

The RND Technical Requirements Document (RND TRD) includes several technical and performance reporting requirements summarized in Section 4. These reports are due to the FCC, the NAOWG, and other regulatory agencies with varying frequency.

2.1 Monthly Reports to the FCC

As required by Sections 4.4, 4.5, and 4.6 of the TRD, the RNDA reported monthly to the FCC on the status of RND availability, trouble tickets, client inquiries, change orders, and RND metrics. The RNDA provided these reports in a timely manner.

2.2 Monthly NAOWG Reports

The RNDA prepared monthly performance measurements and status reports for the NAOWG that were reviewed in depth during monthly meetings. The RNDA reported to the NAOWG on:

- Volume of numbers in the RND
- Volume of queries to the RND
- RND performance metrics
- Trouble Ticket detail
- Outreach activities

In 2023, the RNDA provided timely reports including all of the above information in a detailed and easily accessible format.

2.3   Quarterly Self-Assessments

Per Section 6.1.4 of the TRD, the RNDA is required to provide a Quarterly Self-Assessment of its performance to identify and correct any performance problems to the NANC or its designee within 30 days of the measurement period. The RNDA provided the Quarterly Self-Assessments to the NAOWG within the required time period for discussion at NAOWG monthly meetings.

As required by the TRD, in the Quarterly Self-Assessments, the RNDA provided the following information:

- Summary of areas in which RNDA experienced difficulty and how the RNDA corrected the problem (RNDA internal and external difficulties included)
- Summary and description of incidences of Service Provider/Service Provider Agent, TFNA and Caller/Caller Agent dissatisfaction, and a description of the action taken by the RNDA to ensure the problem shall not reoccur
- Summary and total of written and oral complaints identified by performance metric.

- Summary of major issues addressed by the RNDA including an evaluation of how the RNDA's activities influenced the outcome and how the outcome affected users.

2.4 Quarterly Report

Per Section 4.7 of the TRD, the RNDA is required to provide at a minimum the following information in a Quarterly Report:

- Rolling month over month RND performance report (Up/Down time)
- Rolling month over month Caller metrics (Database queries)
- Rolling month over month Service Provider and TFNA metrics (Database updates)
- Rolling month over month total disconnected telephone numbers
- Rolling month over month report on staffing
- Rolling month over month report on the number of ad hoc reports generated
- Self-Assessment of the RNDA
- Complaints received by the RNDA

2.5 Semi-Annual Report

Per Section 4.8 of the TRD, the RNDA shall produce semi-annual reports of aggregated data that summarize the quantities of disconnected numbers reported each month during the previous six months, producing separate reports for disconnected U.S. geographic and toll-free telephone numbers.

The disconnected U.S. geographic telephone numbers report shall at a minimum, identify the aggregated total of disconnected numbers reported each month and the quantity of Service Providers or reports submitted each month.

The disconnected toll-free telephone numbers reports shall at a minimum, identify the aggregated total of toll-free disconnected numbers reported each month.

Such semi-annual reports shall be provided to the FCC or its designee and posted on the RNDA web site by the last business day of June and December of each year, unless otherwise directed by the FCC.

2.6 NAOWG Evaluation Matrix

The NAOWG tracks the RNDA's performance in the following areas through a monthly evaluation matrix:

- Reporting requirements
- System performance
- Trouble Tickets, Phone Calls and Change Orders Report
- Complaints

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- Staffing
- Security
- Reference Documentation
- TRD Compliance

The Evaluation Matrix shows that the RNDA met all of the requirements for each quarter in 2023.

See Appendix A for 2023 NAOWG Agenda, RNDA Quarterly Self-Assessments, Evaluation Matrix, and 2023 RNDA Annual Report

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Section 3.0   2023 Performance Survey Results

3.1   Survey Ratings – Quantitative Analysis

The RNDA 2023 Performance Survey evaluated the RNDA from the perspectives of Service Providers and Service Provider Agents, which enter reassigned numbers into the RND, and Callers and Caller Agents, which query the RND to determine whether a number has been disconnected since the date of consent entered by the Caller or Caller Agent. Separate surveys were provided to Service Providers/Service Provider Agents and Callers/Caller Agents, although some questions on both surveys were the same. There were 124 respondents, of which 114 were Service Providers or their Agents and 10 were Callers or their Agents. The results are below.

Question Type	Met	Not Met	N/A
RNDA Timely and Courteous Service			
Service Providers/Service Provider Agents	112	0	2
Callers/Caller Agents	9	0	1
RND Operations and Functionality			
Service Providers/Service Provider Agents	111	2	1
Callers/Caller Agents	8	1	1
RNDA Website			
Service Providers/Service Provider Agents	106	3	5
Callers/Caller Agents	9	0	1
RNDA Customer Service			
Service Providers/Service Provider Agents	89	0	25
Callers/Caller Agents	9	0	1
Overall Assessment of RNDA			
Service Providers/Service Provider Agents	112	1	1
Callers/Caller Agents	9	0	1

3.2   RNDA Survey Comments

The comment section in the survey allowed respondents the opportunity to provide details regarding their satisfaction or dissatisfaction with the RNDA's performance in 2023. The NAOWG reviewed all comments to determine if there was a common theme substantiated by multiple respondents. Following is a summary of the comments.

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Many respondents found RNDA staff to be knowledgeable and helpful. RNDA staff provided timely responses to inquiries. One respondent noted that they felt comfortable sharing suggestions for RND improvement with RNDA staff.

Many respondents found the portal easy to use. However, some respondents indicated that data uploads were cumbersome and the formatting could be improved. Another respondent thought that doing a CSV upload was more difficult than it should be. Another respondent recommended the development of an API, since manually running and uploading CSV reports is cumbersome.

One respondent stated that security keys should not have to be updated as frequently as required – once a year should be sufficient. Another respondent suggested the development of a longer term certificate that could be restricted to the originating IP address. This respondent also commented that the two factor authentication process was unusual. A third respondent thought that obtaining public 7 private keys was a hassle as was obtaining a new passphrase when SFTP expires.

Two respondents reported that they had received erroneous messages that they had not submitted their reports. When they contacted RNDA staff, the errors were corrected quickly.

There was one request to extend the submission window from the 11th – 15th of the month to the 1st – 15th of the month. Another respondent expressed concerns about the short filing window. Another respondent suggested quarterly reporting since the monthly reporting window was too small.

One respondent sought clarity as to which provider in a wholesale chain needed to be submitting the telephone number information to the RND.

A service provider recommended that a copy of the listed telephone numbers to use for robocall mitigation should be available.

Another suggestion was to have more reporting options for a service provider to check what telephone numbers they have in the database.

There was another recommendation to develop a process for the situation in which a customer that has been disconnected wants the same number back after the report has been submitted.

On the caller side, there were questions about whether the subscription model was effective. One respondent thought that the subscription model disadvantaged small businesses because of the query cost, limiting their use of the RND.

Another respondent recommended that It would be valuable to report the date the telephone number was last reassigned.   This commenter also objected to the subscription model, stating that they needed to cancel and resubscribe every time to avoid wasting tons of queries. This respondent recommended that the RNDA should

allow a percentage to roll over to the next term or, at minimum, have a setting to automatically top-up when a caller runs out of queries.

See Appendix B for 2023 RNDA Surveys and Appendix C for 2023 RNDA Survey Responses and Written Comments

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Section 4.0   Conclusion and Recommendation

The NAOWG based its 2023 RNDA Performance Evaluation Rating on documentation, information collected, and observations throughout the review year. For the 2023 performance evaluation rating, the NAOWG considered RNDA activities that included interaction with the NAOWG, active participation in industry events, the resolution of issues brought to the RNDA's attention, and suggestions made by the NAOWG throughout the calendar year.

The 2023 survey results revealed a high level of client satisfaction with the RNDA's performance of their duties. RNDA continued to consistently and effectively demonstrate their expertise as the custodian of the RND in all areas in which they were involved. The quality of the work provided by the RND in 2023 was consistent and often exceeded expectations. As a result of this analysis, the NAOWG gives the RNDA a "**Met**" rating.

Notwithstanding the above rating, the NAOWG makes the following recommendations for inclusion in a Program Improvement Plan (PIP):

- Explore whether the reporting window can be expanded and whether an API can be created;
- Explore whether the subscription model can be adapted to promote the use of the RND by small volume callers;
- Review the reports that can be generated by the RND to determine whether additional reports can be generated;
- Evaluate the credentialing process to see if the process can be streamlined without compromising security.

Section 5.0   Acknowledgements & NAOWG Participants

The NAOWG wishes to thank the entire RNDA team for their contributions throughout the year and particularly Beth Sprague for participating in the NAOWG's monthly meetings.

The following NAOWG members have participated in varying degrees by attending NAOWG meetings throughout the year and contributing to the development of this document.

10X People
AT&T
Bandwidth
Charter
Comcast
Cox
District of Columbia PSC
EPIC
Highline
Lumen
Maine PUC
Michigan PSC
NASUCA
NetNumber
New Mexico PRC
North Dakota PSC
REACH
Telnyx
T-Mobile
Verizon
Washington UTC

The NAOWG would like to acknowledge and thank Ed Krachmer, Bill Andrle, Rebecca Maccaroni, and Jonathan Letcher of the FCC who assisted the NAOWG throughout the year by answering questions and providing support.

Section 6.0   List of Appendices

Appendix A   2023 NAOWG Agenda, Quarterly Self-Assessments, Evaluation Matrix, RNDA Annual Report
Appendix B   2023 RNDA Survey Cover Letter and Performance Survey
Appendix C   2023 RNDA Survey Responses and Comments