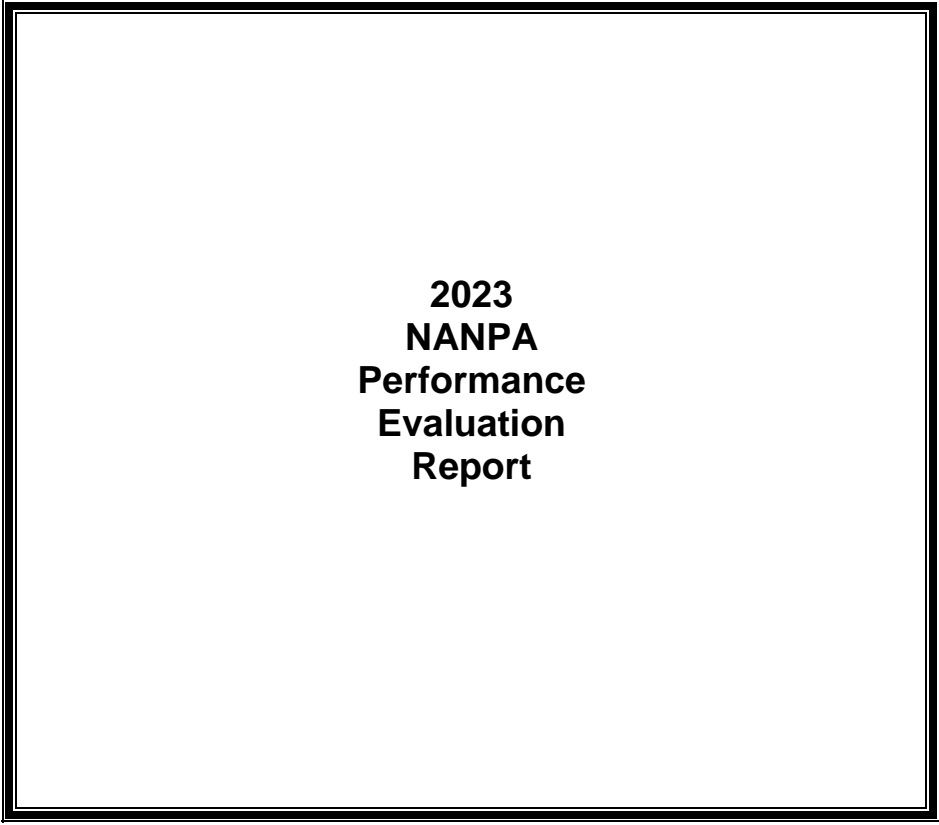**Final Report and Recommendations of the
North American Numbering Council**

NANC

2023
NANPA
Performance
Evaluation
Report

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

June 25, 2024

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Executive Summary

The North American Numbering Plan Administrator (NANPA) serves under a contract with the Federal Communications Commission (FCC) to oversee Numbering Administration, Pooling Administration, and Routing Number Administration for the North American Numbering Plan (NANP). The NANPA'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, NANPA participation in industry forums, observations/interactions between the NANPA 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.

NANPA'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 NANPA for consistency in meeting and often exceeding all requirements related to Code Administration, NPA Relief Planning, NRUF, Pooling Administration, Routing Number Administration, and Other NANP Resources.

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

- Met all of NANPA's performance measurements and required responsibilities in 2023 with one exception in the month of January 2023;
- Allocated numbering resources to service providers associated with the NANPA's code administration, pooling administration and p-ANI administration functions, pursuant to the terms of its contract and industry guidelines;
- Provided high quality customer service to industry, state regulators, and other stakeholders; and
- Made decisions and recommendations that were within requirements and expectations.

Section 1.0   Performance Review Methodology

The annual NANPA 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 NANPA included the following:

- Monthly NAOWG/NANPA oversight meetings
- Monthly NAOWG/NANPA reports
- Monthly NAOWG evaluation matrix
- Quarterly NANPA self-assessments
- Monthly NANPA reports to the FCC
- NANPA Annual Report
- Interactions with the industry, industry groups, and regulators

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 NANPA...
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   NANPA Reporting

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The NANPA Technical Requirements Document (NANPA TRD) includes several technical and performance reporting requirements summarized in Sections 11.13 and 11.14 relating to Numbering Administration, Pooling Administration, and Routing Number Administration and the systems that support these functions, the NANP Administration System (NAS), the Pooling Administration System (PAS), and the Routing Number Administration System (RNAS). 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 11.3, 11.4, 11.5, 11.6, 11.11, 11.12, and 13.3 of the TRD, NANPA reported monthly to the FCC on the status of NPA relief activities, CO Code Activity, Thousands-Block Pooling, Thousands-Block Pooling by rate center, p-ANI administration, p-ANI activity by NPA, system performance, other performance metrics, forecasting data by state, and other resources. NANPA provided these reports in a timely manner.

2.2 Monthly NAOWG Reports

The NANPA prepared monthly performance measurement and status reports for the NANPA, the Pooling Administrator (PA), and the Routing Number Administrator (RNA) functions for the NAOWG that were reviewed in depth during monthly meetings. The NANPA reported to the NAOWG monthly on:

- Geographic resources, including monthly CO code, Thousands block, and p-ANI data for the last twelve months
- Non-geographic resources, such as 5XX-NXX codes and Carrier Identification Codes (CICs)
- NRUF activities
- NPA relief and planning activities
- Other metrics (e.g., system availability, communications, staffing)
- Trouble ticket quantities and details
- Customer Focus activities
- Combined NAS implementation status
- Assistance provided to state regulators and service providers
- General communications with state regulators and service providers

In 2023, the NANPA provided timely reports including all the above information in a detailed and easily accessible format. Upon request of the NAOWG, the NANPA included additional CO code and thousands-block information in its monthly reports to permit NAOWG members to evaluate trends in CO code and thousands-block activity.

2.3   Quarterly Self-Assessments

Per Section 13.1.5 of the TRD, the NANPA is required to provide a Quarterly Self-Assessment of its performance to correct any identified performance problems to the NANC or its designee within 30 days of the measurement period. NANPA provided the

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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 NANPA provided the following information:

- Summary of areas in which NANPA/PA experienced difficulty and how the NANPA/PA corrected the problem (internal and external difficulties included)
- Summary and description of incidences of user dissatisfaction, and a description of the action taken by the NANPA/PA
- Summary and tally of written and oral complaints identified by performance metric
- Summary of major issues addressed by the NANPA/PA including an evaluation of how the NANPA/PA's activities influenced the outcome and how the outcome affected the user

2.4 NAOWG Evaluation Matrix

The NAOWG tracks the NANPA's performance in the following areas through an evaluation matrix:

For the NANPA/PA/RNA:

- Annual report
- Quarterly Self-Assessment
- System Performance Reports
- Trouble Tickets, Phone Calls and Change Orders Report
- Complaints
- Staffing
- Security
- Reference Documentation
- Technical Requirements Document

Additional categories for the NANPA:

- NRUF
- NPA Relief Activity
- CO Code Activity
- Other NANP Activity and Status Reports

Additional categories for the PA:

- Thousands-Block Activity
- Thousands-Block Pooling Reports

Additional categories for the RNA:

- p-ANI Administration Report

- Annual p-ANI Activity and Projected Exhaust Report

The Monthly Evaluation Matrix shows that the NANPA/PA/RNA met all of the requirements in the Second, Third, and Fourth Quarters of 2023. The First Quarter 2023 Evaluation Matrix shows that NANPA did not meet the response time requirement in January in the Trouble Tickets, Phone Calls and Change Order Requests section. NANPA indicated that it took corrective action and met the standard in this category in all other months.

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

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Section 3.0   2023 Performance Survey Results

3.1   Survey Ratings – Quantitative Analysis

The NANPA 2023 Performance Survey evaluated the NANPA, the PA, and the RNA separately. In each survey, there were some questions directed to only industry representatives and some directed to only state regulatory agency staff. Some questions were directed to both groups. Survey results are below.

3.2   NANPA

3.2.1 NANPA Survey

For the NANPA survey, there were 50 respondents, 29 Industry and Other respondents and 21 State Regulatory Commission respondents. Respondents provided a rating for one question in each section. Following are the aggregated response ratings:

Question Type	Met	Not Met	N/A
Central Office Code Administration			
Industry	23	0	6
State Regulators	18	2	1

NPA (Area Code) Relief Planning			
Industry	24	0	5
State Regulators	17	1	3

Numbering Resource Utilization/Forecast (NRUF)			
Industry	27	0	2
State Regulators	18	2	1

Other NANP Resources Administration			
Industry Only	21	0	8

NAS Operations and Functionality			
Industry	24	0	5
State Regulators	20	1	0

NANPA Website and Reports			
Industry	25	2	2
State Regulators	18	3	0

NANPA Industry Activities			
Industry	18	0	11
State Regulators	16	0	5

Overall Assessment of NANPA			

Industry	29	0	0
State Regulators	20	1	0

3.2.2 NANPA Survey Comments

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

Many of the survey respondents praised NANPA staff (often by name) for their efforts to assist respondents and provide needed information. Respondents saw NANPA staff as helpful and easy to work with. NANPA staff assisted with training, general inquiries, and resolving problems. One respondent stated that NANPA "balance[d] regulatory requirements with industry needs" with a particular number assignment.

While some respondents found the NANPA website helpful, other respondents experienced problems navigating the website and finding the information that they needed. One respondent asserted that data was difficult to find and inaccurate. Another respondent indicated that NANPA staff was very helpful in helping the respondent to find information, but the respondent felt that the website could be designed more effectively so that the respondent could find the information without NANPA staff assistance. Some respondents requested that additional links to helpful information be added to the NANPA website.

One respondent noted that many NPAs within a particular state had very similar NPAs and asked that NANPA try to assign NPAs with different numbers in contiguous areas and the same state.

One respondent stated that NANPA should more fully explain available options to states seeking to recover underutilized resources or revise forecasts for resource exhaustion.

Another respondent suggested that when reassigning donated thousands-blocks, NANPA should double-check for unported contaminants before assigning the donated thousands-block. If unported contaminants are found, they should be remedied before assignment of the donated thousands-block to the new service provider.

3.3 Pooling Administrator (PA)

3.3.1 Pooling Administrator Survey

The Pooling Administrator Survey had 23 Industry and Other respondents and 17 State Regulatory Commission Respondents. Respondents provided a rating for one question in each section. Following are the aggregated response ratings:

Question Type	Met	Not Met	N/A
Thousands-block Administration			

Industry	19	0	4
State Regulators	15	0	2

PAS Operations and Functionality			
Industry	22	0	1
State Regulators	10	1	6

PA Website			
Industry	22	0	1
State Regulators	15	1	1

PA Customer Service			
Industry	19	0	4
State Regulators	15	0	2

PA Industry Activities			
Industry	12	0	11
State Regulators	12	0	5

Overall Assessment of PA			
Industry	22	0	1
State Regulators	16	0	1

3.3.2 Pooling Administrator Survey Comments

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

Many of the respondents expressed appreciation for the PA staff, finding them helpful and responsive.

One respondent indicated that the website is not user friendly, although PA staff have been very helpful in resolving problems.

3.4   Routing Number Administrator (RNA)

3.4.1 RNA Survey

For the RNA survey, there were 13 respondents, 3 Industry and Other respondents and 10 State Regulatory Commission respondents. Respondents provided a rating for one question in each section. Following are the aggregated response ratings:

Question Type	**Met**	**Not Met**	**N/A**
RNA p-ANI Administration and Service			

Industry	3	0	0
State Regulators	4	0	6

RNAS Operations and Functionality			
Industry	3	0	0
State Regulators	4	0	6

RNA Website			
Industry	3	0	0
State Regulators	4	0	6

RNA Industry Activities			
Industry	3	0	0
State Regulators	5	0	5

Overall Assessment of RNA			
Industry	3	0	0
State Regulators	7	0	3

3.4.2 RNA Survey Comments

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

The few written comments were generally positive. Most of the comments expressed appreciation for staff's efforts in helping respondents. Respondents found the amount of data available sufficient for their needs.

One respondent questioned the requirement to provide FCC licenses with requests and sought a different way to provide necessary information.

See Appendix B for 2023 NANPA, RNA, and PA Surveys and Appendix C for 2023 NANPA, RNA, and PA Survey Responses and Written Comments

Section 4.0   Change Orders

The NANPA submitted one change order, Change Order IA-1 under Contract #273FCC21C0003, during 2023. The NAOWG reviewed and recommended approval of the change order at its June 2023 monthly meeting. The change order permitted NAS to be updated to remove the restriction on the assignment of existing and future non-geographic 5XX-555 central office codes. Since this change to NAS was anticipated to be minimal, there was no cost assessed for this change. This change order was approved by the FCC on August 28, 2023 and it was implemented on September 15, 2023.

See Appendix D for the 2023 NANPA Change Order

Section 5.0   Conclusion and Recommendation

The NAOWG based its 2023 NANPA Performance Evaluation Rating on documentation, information collected, and observations throughout the review year. For the 2023 performance evaluation rating, the NAOWG also considered NANPA activities that included interaction with the NAOWG, active participation at the Industry Numbering Committee (INC) and other industry forums, the resolution of issues brought to the NANPA'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 NANPA's performance of their duties. NANPA continued to consistently and effectively demonstrate their expertise as the custodian of numbering resources in all areas in which they were involved. The quality of the work provided by the NANPA in 2023 was consistent and often exceeded expectations. As a result of this analysis, the NAOWG gives the NANPA a "**Met**" rating.

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

- Review the reservation and assignment of new NPAs so that similar NPAs are not used in contiguous NPAs or the same state to reduce caller confusion;
- Consider updates to publicly available information specific to States efforts with their delegated authority;
- Develop a method to re-verify the contamination level of an available thousands-block in the pool before assigning it thousands block to a Service Provider, to ensure the contamination level has not increased since the thousands-block was donated/returned to the pool;
- Increase transparency in the work being performed of the development of the new combined NAS;
- Provide increased transparency on the development that will be provided to enhance the user experience in the new system, e.g. enhancements to the NANPA website and efficiencies created for service providers and state regulators in the new NAS;
- Provide tracking of TRD requirements as compared to the work being performed in the development of the new combined NAS.

Section 6.0   Acknowledgements & NAOWG Participants

The NAOWG wishes to thank the entire NANPA team for their contributions throughout the year, and particularly Florence Weber 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	Michigan PSC
AT&T	NASUCA
Bandwidth	NetNumber
Charter	New Mexico PRC
Comcast	North Dakota PSC
Cox	REACH
District of Columbia PSC	Telnyx
EPIC	T-Mobile
Highline	Verizon
Lumen	Washington UTC
Maine PUC	

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 7.0   List of Appendices

Appendix A   2023 NAOWG Agenda, Quarterly Self-Assessments, Monthly Evaluation
                Matrix, NANPA Annual Report
Appendix B   2023 NANPA/PA/RNA Survey Cover Letter and Performance Survey
Appendix C   2023 NANPA/PA/RNA Survey Responses and Comments
Appendix D   2023 NANPA Change Order