



**ATIS-0300089**

## **P-ANI Administration Guidelines**

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The Industry Numbering Committee (INC) provides an open forum to address and resolve industry-wide issues associated with planning, administration, allocation, assignment and use of North American Numbering Plan (NANP) numbering resources within the NANP area.

This document is maintained under the direction of ATIS and the INC. Suggestions for improvement of this document are welcome. They should be sent to the Alliance for Telecommunications Industry Solutions, INC Staff, 1200 G Street NW, Suite 500, Washington, DC 20005. All changes to this document shall be made through the INC issue resolution process and adopted by the INC as set forth in the *ATIS Operating Procedures*.

The INC wishes to acknowledge the cooperation of the ATIS Emergency Services Interconnection Forum (ATIS ESIF) in the development of these Guidelines.

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## **P-ANI FORMS**

Attachment 1: Part 1 P-ANI Application Form

Attachment 2: Part 3 RNA Response/Confirmation Form

Appendix 1: P-ANI Forecast Report

Appendix 2: P-ANI Annual Report

## 1.0 Purpose and Scope

This document specifies guidelines for the administration and assignment of non-dialable pseudo Automatic Number Identification (p-ANI) numbers<sup>1</sup> to Eligible Users in areas where access to such numbering resources has been ordered or implemented. P-ANIs are typically used for call routing and location display of callers that subscribe to a service that is either mobile, nomadic, or that involves a user telephone number containing an NPA that is foreign to the serving E9-1-1 selective routing system.

All p-ANI requests and necessary forms will be submitted by p-ANI Applicants to the Routing Number Administrator (RNA)<sup>2</sup> by filling out the appropriate request and/or form provided on the RNA Web Site ([www.nationalpani.com](http://www.nationalpani.com)).<sup>3</sup> An industry database (see Section 5.1) will verify the password and access level of the user. All electronic submissions from an authorized user will be considered as an electronic signature and will be verified for authenticity utilizing criteria maintained in the RNA System. In addition, these guidelines outline the processes used between the RNA and:

- P-ANI Applicants
- Eligible Users
- P-ANI Assignees
- Governmental Agencies

P-ANI number resources, in the context of these guidelines, allows for the assignment of p-ANI numbers from the pool which consists of both NPA-211-XXXX and NPA-511-XXXX. When the 211/511 resources exhaust (See Section 5.7) within an NPA, the INC will make another NXX available to the RNA to use to replenish the p-ANI inventory. When the next available NXX is opened for the first time, the INC will determine the next non-dialable resource<sup>4</sup> to be utilized for p-ANI purposes.

These guidelines apply to the assignment of p-ANI numbers within geographic numbering plan areas (NPAs) under the jurisdiction of the Federal Communications Commission (FCC). These guidelines do not preclude any future effort to address non-geographic NPAs, but it is recognized that some toll-free NPA-N11-XXXX numbers are assigned to subscribers and therefore cannot be used as p-ANIs.

P-ANIs are assigned for use in a selective routing system for which the Eligible User has approval from the 9-1-1 governing authority to route E9-1-1 traffic for termination to a Public

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<sup>1</sup> See Glossary.

<sup>2</sup> Letter from Thomas J. Navin, Chief, Federal Communications Commission Wireline Competition Bureau to Thomas M. Koutsky, Chair, North American Numbering Council and Amy Putnam, Director, NeuStar Pooling Services; Sep. 8, 2006; <http://esqk.com/documents/fcc-int-rna-appt/p-ANI%20Admin%20Letter%20090806.pdf>

<sup>3</sup> Only those users with a valid profile will be permitted to submit applications or changes on behalf of an Eligible User.

<sup>4</sup> The INC shall not designate the central office code "911" for use as a p-ANI resource because NPA-911-XXXX may continue to be used to represent a problem condition at the PSAP.

Safety Answering Point (PSAP). While the ultimate delivery of any call to a PSAP must be based upon the geographic location of the caller, by necessity the association of the geographical location of the caller's telephone number and the p-ANI is typically made using the Selective Routing Data Base (SRDB).

In instituting these guidelines, all entities formerly assigning p-ANI resources will discontinue such practices and transition administration and control of formerly assigned non-dialable p-ANIs to the RNA in accordance with schedules and deadlines mutually set between the affected entities and the RNA.

These guidelines do not supersede appropriate North American Numbering Plan (NANP) area governmental or regulatory principles, procedures, and requirements. For interpretation of these guidelines, see Section 9.0.

## **2.0 Assumptions and Constraints**

The development of these non-dialable p-ANI administration guidelines is based on the following assumptions and constraints:

- 2.1 P-ANI resources covered in these guidelines are collectively managed by the telecommunications industry with oversight by the appropriate governmental agency in areas served by the NANP.
- 2.2 The RNA will obtain the necessary Eligible User documentation to establish and administer the p-ANI resources.
- 2.3 The p-ANI resources are considered a public resource and are not owned by the p-ANI Assignees or the RNA. Consequently, the resources cannot be sold, brokered, bartered, or leased by the p-ANI Assignee for a fee or other consideration. If a resource is sold, brokered, bartered, or leased for a fee, the resource is subject to reclamation (See Section 8.0).
- 2.4 These guidelines apply only to the assignment of p-ANI resources to Eligible Users for use in 9-1-1 selective routing systems and/or for E9-1-1 display purposes.
- 2.5 P-ANI resources shall be assigned to facilitate the most effective and efficient use of a finite numbering resource in order to prevent premature exhaust of p-ANI resources.
- 2.6 Each individual NPA is considered a separate pool of p-ANI numbers even in cases where an NPA overlay situation exists because of technical limitations (e.g. many selective routers can only support a maximum of four NPAs).
- 2.7 A p-ANI Applicant requesting resources from the p-ANI inventory:

a) shall provide, as part of its application for p-ANIs, evidence demonstrating that the p-ANI Applicant is an Eligible User of p-ANI resources. An Eligible User is defined as an entity that:

1) Demonstrates that it is permitted under applicable law to access p-ANI resources in the area for which the p-ANI resources are sought;

- A wireless service provider applicant shall provide the RNA a copy of its FCC license, showing that it is authorized to provide service in the area in which it is seeking resources. In the case that the name on the license 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.
  - If a wireless service provider provides a non-exclusive 3650-3700 MHz Radio Service nationwide license, it shall also provide a 3650-3700 MHz Service Registration Acceptance Letter from the FCC to establish both that it has registered fixed sites and base stations, and the location of those sites.
- Any entity that requires p-ANIs to comply with any state or federal order and that has been certified as a CLEC by a state shall provide the RNA a copy of its state certification showing that it is authorized to provide service in the area in which it is seeking resources.<sup>5</sup> In the case that the name on the 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 CPCN.
- An interconnected VoIP service provider applicant shall provide the RNA with a copy of its FCC nationwide authorization<sup>6</sup>.
- A VPC provider applicant shall provide documentation from the state or the state's general counsel in the form of<sup>7</sup>:
  1. An order of the commission denying certification, with the reason for the denial being that the state does not certify VPC providers, or
  2. A statement from the state commission or its general counsel that it does not certify VPC providers.

The RNA will then retain this information in its records for that VPC provider's future requests for that specific state.

When a service provider's jurisdictional certification, license, or authorization to operate has been revoked, the appropriate regulatory authority should provide written direction and supporting documentation to the RNA to deny applications for the company name associated with the revoked jurisdictional certification,

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<sup>5</sup> See Implementation of the NET 911 Improvement Act of 2008, FCC 08-249, at Footnote 66: citing 47 CFR § 52.15(g)(2); see also Footnote 84.

<sup>6</sup> FCC 15-70, ¶ 14 and 47 CFR § 52.15(g)(3).

<sup>7</sup> 47 CFR § 52.15(g)(2).

license, or authorization.<sup>8</sup> The RNA will remove any current p-ANI forecasts (Appendix 1: P-ANI Forecast Report) associated with the SP's OCN/NENA ID, however the SP may enter a new p-ANI forecast (Appendix 1) once it has demonstrated that the License, Certification, and/or FCC Authorization has been reinstated.

- 2) Has received approval from the 9-1-1 governing authority to route E9-1-1 traffic for termination to a Public Safety Answering Point (PSAP)<sup>9</sup>;
- 3) Has been assigned a valid Operating Company Number (OCN)<sup>10</sup>. The OCN must be associated with a NECA Company Code (OCN) Category Type that has been determined to be appropriate for the direct assignment of numbering resources. The following is the list of permitted Company Code Category Types for numbering resources:

Incumbent Local Exchange Carrier	ILEC
Regional Bell Operating Company	RBOC
Competitive Local Exchange Carrier	CLEC
Personal Communications Service	PCS
Unbundled Local Exchange Carrier	ULEC
Wireless Carriers	WIRE
Internet Provider Enabled Services	IPES (only interconnected VoIP)

The RNA will deny all numbering applications from SPs with an OCN category that is not permissible for numbering assignments.

- 4) Has been assigned a valid NENA Company Identifier (ID) 1 by the National Emergency Number Association (NENA)<sup>11</sup>; and
- 5) Self-certifies that it will provide the technical and functional capability to route traffic or provide routing instructions to enable emergency call delivery to a PSAP.

- b) shall establish internal policies and practices that provide for the efficient use and assignment of p-ANIs.

2.8 The schedule of holidays recognized by the RNA will affect the administration of these guidelines. Holidays posted on the RNA website will not be considered a "business day" as a part of any timing of p-ANI allocation(s) in association with these guidelines.

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<sup>8</sup> FCC 00-104 ¶ 97 and FCC 15-70 ¶ 53.

<sup>9</sup> December 14, 2010, letter from the Wireline Competition Bureau Chief to the NANC Chair and the Director of Number Pooling Services.

<sup>10</sup> See Glossary.

<sup>11</sup> See Glossary.



- 2.9 P-ANI Assignees and the RNA are responsible for managing p-ANI resources in accordance with these guidelines and the orders of the appropriate governmental agency. Both p-ANI Assignees and the RNA are subject to audits.
- 2.10 Audits of the RNA and p-ANI Assignees may be performed by the appropriate bureau(s) within the FCC or other appropriate governmental agency, or other designated agents to:
- a) ensure uniformity in application of these guidelines by the RNA to all p-ANI requests received by the RNA;
  - b) ensure compliance with these guidelines by p-ANI Assignees and the RNA; and
  - c) ensure the efficient and effective use of p-ANIs by p-ANI Assignees and efficient and effective management of p-ANI resources by the RNA.

### **3.0 P-ANI Assignment Principles**

The following assignment principles apply to all aspects of these guidelines:

- 3.1 The RNA will assign individual p-ANIs or p-ANI ranges from the established p-ANI inventory. P-ANIs will be available for assignment from both the 211 central office code (or “NXX”) and 511 NXX initially. For purposes of this provision, a p-ANI is “not available for assignment,” if it is classified as:
- a) Aging
  - b) Assigned
  - c) Unavailable
- as defined in the Glossary.
- 3.2 P-ANIs are assigned uniquely to individual Eligible Users in contiguous ranges (where possible). However, the RNA cannot guarantee that all p-ANIs will be assigned in contiguous ranges.
- 3.3 P-ANI resources in the p-ANI inventory shall be available and allocated to Eligible Users in a fair and non-discriminatory manner (i.e., on a first come, first served basis).
- 3.4 Information that is submitted by p-ANI Applicants in support of a p-ANI assignment shall be kept to a minimum, be uniform for all applicants, and be treated as proprietary and adequately safeguarded by the RNA, pursuant to FCC confidentiality rules.<sup>12</sup>
- 3.5 P-ANIs are assigned for use by a selective routing system for which the Eligible User has approval to route E9-1-1 traffic for termination to a PSAP.

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<sup>12</sup> 47 CFR, § 52.13 (c) (7).

- 3.6 NPA-211-XXXX and NPA-511-XXXX formats will be used for p-ANI assignment. The NPA of the p-ANI shall coincide with an NPA valid for the serving selective routing system. P-ANIs shall be considered non-dialable in the Public Switched Telephone Network (PSTN).
- 3.7 Any Eligible User that is denied the assignment of one or more p-ANIs under these guidelines has the right to appeal that decision, per Section 9.0.
- 3.8 The RNA shall accept and fulfill requests for specific p-ANIs if they are currently available for assignment from the p-ANI inventory, subject to the criteria identified in Section 7.0.
- 3.9 P-ANI Assignees may not trade p-ANIs between themselves.
- 3.10 P-ANIs may be transferred between Eligible Users, via the RNA, if the p-ANI is In Use and one or more of the following conditions is met:
- a) merger or acquisition;
  - b) both entities involved mutually agree to the transfer of the p-ANI and coordinate through the RNA (see Section 7.4);
  - c) authorization or directive received from the appropriate governmental agency.

All p-ANI transfers must be mutually agreed to by both the relinquishing and receiving parties.

- 3.11 A p-ANI returned in error to the RNA is retrievable by the p-ANI Assignee, provided the p-ANI is Aging. This is accomplished via e-mail between the p-ANI Assignee and the RNA in order to establish an audit trail.
- 3.12 The 211-9950 through 211-9999 p-ANI ranges in every NPA<sup>13</sup> shall be Unavailable for assignment to Eligible Users because they are used for Next Generation 9-1-1 Legacy Selective Router Gateway (LSRG) purposes.<sup>14</sup> These ranges shall be made Unavailable for assignment in any new NPA added to RNAS as well.

## 4.0 Eligible User Responsibilities

Eligible Users have several responsibilities in a p-ANI environment. These responsibilities vary depending on whether the Eligible User is a p-ANI Applicant or a p-ANI Assignee. These responsibilities are outlined below:

### 4.1 P-ANI Applicant Responsibilities

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<sup>13</sup> In NPAs 281, 405, 806, 870, and 903, the Unavailable p-ANI ranges for these purposes are 511-8950 through 511-8999.

<sup>14</sup> In 2015, the NENA i3 Architecture Working Group requested that these ranges be allocated for this purpose and the FCC subsequently approved it on May 5, 2015, via email to the RNA.

A p-ANI Applicant is responsible for obtaining a current copy of the P-ANI Administration Guidelines<sup>15</sup>. A p-ANI Applicant requesting resources from the p-ANI inventory shall:

- a) meet the definition of an Eligible User as defined in Section 2.7 a;
- b) complete the Part 1 P-ANI Application Form (Attachment 1) per these guidelines;
- c) have a current P-ANI Forecast Report (Appendix 1) on file with the RNA . A p-ANI Applicant making its first request in an NPA shall provide a P-ANI Forecast Report (Appendix 1) of p-ANI resource needs to the RNA prior to submitting the p-ANI request for the requested NPA;
- d) provide a detailed explanation that documents the p-ANI Applicant's need for said specific quantity of p-ANIs in the comments field on the Part 1 P-ANI Application Form (Attachment 1) when making a request in excess of any applicable ESIF Formula<sup>16</sup> or in excess of 50 p-ANIs if no formula applies. If the p-ANI applicant is requesting additional p-ANIs in a PSAP where it has existing p-ANI resources, then the applicant shall include those resources and the quantity that is being requested when determining if the request exceeds the applicable ESIF Formula or exceeds 50 p-ANIs when no formula applies. and
- e) have a current P-ANI Annual Report (Appendix 2) on file with the RNA unless it is the p-ANI Applicant's first request for any p-ANI resources.

P-ANI Applicants disputing the RNA's decision to deny a request for p-ANI resources may appeal the RNA's decision in accordance with Section 9.0.

All documentation submitted to the RNA will be held confidential, pursuant to FCC confidentiality rules.<sup>17</sup>

## 4.2 P-ANI Assignee Responsibilities

A p-ANI Assignee shall:

- a) notify the RNA via the Part 1 P-ANI Application Form (Attachment 1) of any changes made to p-ANIs retained from previous p-ANI Administrators or assigned by the RNA. For example, such a change may occur due to mergers or acquisitions or other scenarios;

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<sup>15</sup> p-ANI Applicants can obtain a current copy of the p-ANI Administration Guidelines at [https://www.atis.org/01\\_committ\\_forums/inc/documents/](https://www.atis.org/01_committ_forums/inc/documents/).

<sup>16</sup> The ESIF Formula document (ATIS-0500018, *p-ANI Allocation Tables for ESQKs, ESRKs, and ESRDs*) can be obtained at <https://www.atis.org>.

<sup>17</sup> 47 CFR, § 52.13 (c) (7).

- b) arrange for the entry of any information to the appropriate Automatic Location Identification (ALI) databases, selective routing system databases (SRDB) and/or other databases or systems, due to receipt of a new p-ANI;
- c) remove records from the applicable ALI databases, SRDBs, and/or other databases or systems for p-ANIs returned to the RNA;
- d) abide by the p-ANI Assignment and Reclamation procedures outlined in Sections 7.0 and 8.0;
- e) provide annual utilization data at the p-ANI level via the P-ANI Annual Report (Appendix 2) to the RNA for input in the p-ANI relief planning process (see Section 5.7);
- f) maintain sufficient and auditable data to demonstrate compliance with these guidelines; and
- g) return p-ANI resources not In Use to the RNA.

Information that is submitted by p-ANI Applicants in support of a p-ANI assignment shall be kept to a minimum, be uniform for all applicants, and be treated as proprietary and adequately safeguarded by the RNA, pursuant to FCC confidentiality rules.<sup>18</sup>

#### 4.3 RNA System Registrant Responsibilities

Each p-ANI Applicant is responsible for registering with the RNA in order to obtain access to the RNA System. The RNA has up to five business days to assign a password and notify the registrant. Each approved registrant will have a unique password for accessing the RNA System. For further information, see [<http://www.nationalpani.com>].

Information that is submitted by p-ANI Applicants in support of a p-ANI assignment shall be kept to a minimum, be uniform for all applicants, and be treated as proprietary and adequately safeguarded by the RNA, pursuant to FCC confidentiality rules.<sup>19</sup>

## 5.0 RNA Responsibilities

The following describes the high level responsibilities of the RNA in:

- General Administration Duties
- Forecasting and Planning Processes

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<sup>18</sup> 47 CFR, § 52.13 (c) (7).

<sup>19</sup> 47 CFR, § 52.13 (c) (7).

- Assignment Processes
- Reporting Processes
- Reclamation Processes
- Audits
- P-ANI Relief Planning

Information that is submitted by p-ANI Applicants in support of a p-ANI assignment shall be kept to a minimum, be uniform for all applicants, and be treated as proprietary and adequately safeguarded by the RNA, pursuant to FCC confidentiality rules.<sup>20</sup>

Detailed RNA responsibilities are described in the appropriate process sections of these guidelines.

## 5.1 General Administration Duties

The RNA shall:

- provide, upon request, information and answer questions for clarification regarding p-ANI administration processes, procedures, interfaces, and services;
- provide, upon request, information on how to obtain documents related to p-ANI administration. This can be accomplished by either referring the requestor to web sites where it will be possible to download electronic copies, or by providing electronic copies via e-mail;
- be responsible for maintaining p-ANI inventory;
- assure the availability, based upon industry established criteria, of p-ANI resources within a given NPA;
- add to the p-ANI resources in the p-ANI inventory when necessary (See Section 5.7);
- update the RNA System to reflect any changes resulting from NPA relief activity (i.e., add new p-ANI resources to the p-ANI inventory when a new geographic NPA is in service). For specific details, see NPA Code Relief Planning & Notification Guidelines (ATIS-0300061);
- provide copies of the P-ANI Administration Guidelines (ATIS-0300089) when requested by p-ANI Applicants, including timely notification of changes;

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<sup>20</sup> 47 CFR, § 52.13 (c) (7).

- h) track p-ANI assignments and perform other operational functions (e.g., p-ANI reclamation);
- i) make available on its web site the RNA recognized holidays and distribute as necessary;
- j) log and track all p-ANI applications using a tracking mechanism which will enable the RNA and p-ANI Applicant to identify a specific p-ANI request; and
- k) build and maintain an industry database which includes appropriate security for confidential data. The database will be accessible through an appropriate mechanism and, at a minimum, include the following information:
  - 1) all p-ANIs in the p-ANI inventory (i.e., NPA-NXX-XXXX range information displayed);
  - 2) status of the p-ANIs (i.e., assigned, available, aging, unavailable);
  - 3) identification of the p-ANI Assignee to which the p-ANI or the p-ANI range has been assigned;
  - 4) the Selective Router CLLI™ information associated with each assigned p-ANI or p-ANI range; and
  - 5) RNA System user profile(s) that contain the user's contact information, OCN, NENA Company ID 1 and level of access permitted. A user may need multiple individual profiles and passwords. The OCN must be associated with a NECA OCN Category Type that has been determined to be appropriate for the direct assignment of numbering resources. The following is the list of permitted Company Code Category Types for numbering resources:

Incumbent Local Exchange Carrier	ILEC
Regional Bell Operating Company	RBOC
Competitive Local Exchange Carrier	CLEC
Personal Communications Service	PCS
Unbundled Local Exchange Carrier	ULEC
Wireless Carriers	WIRE
Internet Provider Enabled Services	IPES (only interconnected VoIP)

The RNA will deny all numbering applications from SPs with an OCN category that is not permissible for numbering assignments.

## 5.2 Forecasting and Planning Processes

The RNA shall:

- a) compile demand forecasts of all Eligible Users and generate a total forecast for the p-ANI inventory;

- b) perform statistical analysis of the Eligible Users' forecasts to assure adequate p-ANI resources are available for the industry's use through timely replenishment of the p-ANI inventory; and
- c) follow the process outlined in Section 5.7 for p-ANI relief planning when the p-ANI resources appear to be within 1 year of exhaust.

### 5.3 Assignment Processes

The RNA shall:

- a) Using the RNA system, receive all applications for p-ANIs from p-ANI Applicants, validate the OCN is a type permitted numbering resource assignments and NENA Company ID 1, and check each field for completeness;
- b) Verify that the p-ANI Applicant has completed the Part 1 P-ANI Application form (Attachment 1) containing all of the pertinent information such as OCN (Operating Company Number), NENA Company ID 1, PSAP name, PSAP state, etc.;
- c) assist p-ANI Applicants, as necessary, with the completion of all p-ANI forms;
- d) attempt to satisfy all Eligible Users' requests for specific p-ANI(s) whenever possible, subject to the criteria identified in Section 7.3.2;
- e) select the specific p-ANI(s) for assignment, or provide the reason to the p-ANI Applicant why the assignment cannot be made;
- f) respond to the p-ANI Applicant's request(s) for p-ANIs within five (5) business days following receipt of the request by issuing the Part 3 RNA Response/Confirmation Form (Attachment 2) to the p-ANI Applicant.

### 5.4 Reporting Processes

The RNA shall:

- a) prepare and publish a "p-ANI Activity and Projected Exhaust Report" annually that includes the following information:
  - 1) national p-ANI utilization information;
  - 2) p-ANI utilization by NPA;
  - 3) the number of p-ANIs requested on a monthly basis;
  - 4) the number of p-ANIs assigned on a monthly basis;
  - 5) the number of p-ANIs returned on a monthly basis;
  - 6) the number of p-ANIs modified on a monthly basis;
  - 7) the number of p-ANI requests processed and the disposition of each; and

- 8) forecast reports for projected future p-ANI resource usage;
- b) provide the appropriate governmental agency with disaggregated forecast and utilization data, if requested anytime after thirty (30) days following the submission deadline of the Appendix 2: P-ANI Annual Report;
- c) provide the ability in the RNA System for the p-ANI Assignee to download reports that are specific to that p-ANI Assignee of all p-ANIs assigned with their status by OCN (a type permitted numbering resource assignments), NENA Company ID 1 and/or NPA;
- d) treat p-ANI Applicant and/or Eligible User-specific data submitted to it as proprietary pursuant to FCC confidentiality rules;
- e) aggregate p-ANI Applicants' and/or Eligible Users' forecast data and only publish data that have been aggregated; and
- f) make available to the PSAP community individual p-ANI assignments for emergency purposes upon request.

## 5.5 P-ANI Reclamation Processes

The RNA is responsible for ensuring that p-ANIs are reclaimed when necessary (see Section 8.0).

## 5.6 Audits

In the performance of its duties and in meeting its responsibilities, the RNA may encounter situations that may alert it to a possible noncompliance with the industry guidelines that warrants the need for an audit. In these situations, the RNA will inform and forward relevant information that contains the details of the possible infraction to the designated auditor or appropriate governmental agency for disposition.

In addition, the RNA may be required to provide p-ANI Assignee-specific data to an auditor in order to facilitate the audit process.

## 5.7 P-ANI Relief Planning

The RNA's responsibilities for p-ANI relief planning shall include the following:

- 5.7.1 P-ANI assignments shall be tracked and monitored. The RNA shall prepare an "p-ANI Activity annual report of aggregated p-ANI utilization, which shall be posted on the RNA website and shall be presented to the INC at the meeting following the posting of the annual report.



5.7.2 When the projected exhaust of the 211/511 resources within any NPA is within 1 year, the RNA shall notify the INC.

5.7.2.1 No less than 12 months prior to the first implementation of a new NXX in the US and Puerto Rico, the RNA shall notify telecommunication service providers, all Mobile Positioning Centers (MPC), all VoIP Positioning Centers (VPC), all PSAPs and all E9-1-1 service providers that a new NXX is being made available in the p-ANI inventory for assignment.

## 5.8 NPA Relief Activities

### 5.8.1 RNA Responsibilities for NPA Relief Implementation for NPA Splits

Upon notification from NANPA, the RNA shall send the NANPA planning letter to the RNA system users. The RNA shall also forward the NANPA planning letter to NENA and Association of Public-Safety Communications Officials (APCO) requesting distribution to their membership. The RNA shall also provide a link to the NANPA website ([http://www.nationalnanpa.com/contact\\_us/mailling\\_list.html](http://www.nationalnanpa.com/contact_us/mailling_list.html)) where interested recipients may sign up for future planning letter updates.

The RNA shall make unavailable for assignment the 211-9950 through 211-9999 p-ANI range in each new NPA added to RNAS.<sup>21</sup> The RNA shall not assign p-ANI resources in the new NPA until the permissive dialing date.

### 5.8.2 RNA Responsibilities for NPA Relief Implementation for NPA Overlays

Upon notification from NANPA, the RNA shall send the NANPA planning letter to the RNA system users. The RNA shall also forward the NANPA planning letter to NENA and APCO requesting distribution to their membership. The RNA shall also provide a link to the NANPA website ([http://www.nationalnanpa.com/contact\\_us/mailling\\_list.html](http://www.nationalnanpa.com/contact_us/mailling_list.html)) where interested recipients may sign up for future planning letter updates.

The RNA shall make unavailable for assignment the 211-9950 through 211-9999 p-ANI range in each new NPA added to RNAS.<sup>22</sup> The RNA shall not assign p-ANI resources in the new NPA until the effective date of the new NPA.

## 6.0 Forecast and Annual Reporting Requirements

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<sup>21</sup> On May 5, 2015, via email to the RNA, the FCC approved the RNA's making this range unavailable for assignment so that those p-ANIs can be used for Next Generation 9-1-1 Legacy Selective Route Gateway (LSRG) purposes.

<sup>22</sup> On May 5, 2015, via email to the RNA, the FCC approved the RNA's making this range unavailable for assignment so that those p-ANIs can be used for Next Generation 9-1-1 Legacy Selective Route Gateway (LSRG) purposes.

P-ANI Assignees and p-ANI Applicants shall submit their P-ANI Forecast Report (Appendix 1) to the RNA on a semi-annual basis on or before April 1st for the period of April 1st of the current year through March 31st of the following year, and on or before October 1st for the period of October 1st of the current year through September 30th of the following year. P-ANI Assignees shall submit their P-ANI Annual Report (Appendix 2) to the RNA on an annual basis on or before April 1st for the period ending on December 31st of the previous year. Information that is submitted shall be treated as proprietary and adequately safeguarded by the RNA, pursuant to FCC confidentiality rules. The data provided in these reports will allow the RNA to correlate p-ANI consumption, deployment and forecasts in order to ensure timely availability of p-ANI resources at the NPA level.

## 6.1 Forecast Process

- 6.1.1 P-ANI Applicants and p-ANI Assignees shall provide a P-ANI Forecast Report (Appendix 1), on a semi-annual basis, by NPA to the RNA. P-ANI Applicants and p-ANI Assignees that have not submitted a P-ANI Forecast Report (Appendix 1) will not receive any requested p-ANIs until the report is submitted to the RNA. The P-ANI Forecast Report is based on a 12-month interval. The forecast submitted shall reflect the anticipated quantity of p-ANIs needed in six month increments for the current forecast reporting period. The RNA will determine p-ANI exhaust based on the available p-ANI inventory for each NPA and the forecasts received for each NPA.
- 6.1.2 If p-ANI Applicants or p-ANI Assignees identify any changes in their p-ANI forecast for an NPA, they shall provide an updated P-ANI Forecast Report (Appendix 1) for that NPA to the RNA as soon as possible. This updated forecast will completely replace the previous forecast filed for that NPA.
- 6.1.3 If a p-ANI Applicant submits a Part 1 P-ANI Application Form (Attachment 1) for additional p-ANIs, and resources are not available to satisfy the request within the NPA, the RNA will suspend the request until additional p-ANI resources are designated and/or become available (see Section 5.7).
- 6.1.4 The RNA will remove any current p-ANI forecasts (Appendix 1: P-ANI Forecast Report) associated with the SP's OCN/NENA ID when the appropriate regulatory authority provides written direction and supporting documentation to the RNA that a service provider's jurisdictional certification, license, or authorization to operate has been revoked. The applicant will be allowed to enter a new p-ANI forecast (Appendix 1) once the applicant has demonstrated that the License, Certification, and/or FCC Authorization has been reinstated.

## 6.2 P-ANI Assignee Annual Report Process

P-ANI Assignees shall report to the RNA on all of their assigned p-ANI ranges via the P-ANI Annual Report (Appendix 2) on an annual basis by April 1st for the period ending on December 31st of the previous year. P-ANI Assignees that have not submitted a P-ANI Annual Report (Appendix 2) shall not receive requested p-ANIs until the report is submitted to the RNA. The RNA shall use the P-ANI Annual Report data to identify which

p-ANIs have been assigned, but are not In Use. Unused p-ANIs shall be subject to reclamation (see Section 8.0).

P-ANI Assignees may utilize the reports from the RNA System that are specific to that p-ANI Assignee of all p-ANIs assigned with their status by OCN (a type permitted numbering resource assignments), NENA Company ID 1, and/or NPA to assist in completing the P-ANI Annual Report.

## **7.0 Assignment of p-ANIs**

### **7.1 Criteria for p-ANI Assignment**

The following criteria shall be used by the RNA in reviewing a p-ANI request:

- a) the p-ANI Applicant must meet the definition of an Eligible User (see Glossary);
- b) multiple p-ANIs (See Section 3.2) may be requested on one Part 1 P-ANI Application Form (Attachment 1); and
- c) the p-ANI Applicant must have on file a current P-ANI Forecast Report (Appendix 1) and a current P-ANI Annual Report (Appendix 2) with the RNA in order to be assigned a p-ANI (see Section 6.0); however, if this is the p-ANI Applicant's first request for any p-ANI resources, its P-ANI Annual Report will not be required until the next reporting cycle in accordance with the timeframes outlined in these guidelines.
- d) the FCC's "Red Light Rule" mandates that any organization delinquent in debts owed to the FCC is barred from receiving numbering resources from the RNA until the delinquency has been resolved.<sup>23</sup> If the applicant's FCC Registration Number (FRN), associated with its OCN(s), is appearing in the FCC's Red Light Display System (<http://www.fcc.gov/redlight>) at the time the RNA is processing the application, the application shall be denied.

### **7.2 Application Process**

- 7.2.1 The p-ANI Applicants shall submit their requests to the RNA using the electronic Part 1 P-ANI Application Form (Attachment 1) found on the RNA's website. An industry database (see Section 5.1) will verify the password and access level of the user. All electronic submissions from an authorized user will be considered as an electronic signature and will be verified for authenticity utilizing criteria maintained in the RNA System.

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<sup>23</sup> See FCC Order 04-72 released April 13, 2004 and FCC Public Notice DA 12-1192 released July 25, 2012.

7.2.2 The p-ANI Applicant shall indicate on the Part 1 P-ANI Application Form (Attachment 1) if any p-ANI is acceptable or whether for technical limitations and/or administrative reasons, only certain p-ANIs may be assigned to the p-ANI Applicant. Specific p-ANIs may be requested on the application.

7.2.3 If there are 50 or more new p-ANI requests needed, a mass new p-ANI request spreadsheet can be sent to the RNA. A maximum of five hundred rows of new p-ANI requests may be submitted on a single mass new p-ANI request spreadsheet. The current spreadsheet can be found on the RNA website ([www.nationalpani.com](http://www.nationalpani.com)).

Note: SPs are responsible for all updates to any other affected systems or databases.

7.2.4 The RNA receives the Part 1 P-ANI Application Form (Attachment 1) from the p-ANI Applicant. Additional information and/or dialogue may be required by the RNA with the p-ANI Applicant to facilitate application processing. The RNA is required to respond to the p-ANI Applicant within five (5) business days of receipt of the p-ANI request.

7.2.5 A p-ANI Applicant must ensure that the appropriate technologies and systems that allow for the use of the p-ANIs are in place. However, these technologies and systems are outside the scope of these guidelines.

7.2.6 An Eligible User may exchange an assigned p-ANI with the RNA only if the desired p-ANI and the assigned p-ANI are in the same NPA, and the desired p-ANI is available for assignment.

### 7.3 Process for Assignment of p-ANIs

7.3.1 The need for p-ANI assignments occurs only when an Eligible User initiates service in a new E9-1-1 jurisdiction or new ESN/ESZ within a jurisdiction, or must augment existing p-ANI ranges in an already deployed situation.

7.3.2 In reviewing a p-ANI request the RNA shall:

- a) Verify that the p-ANI Applicant has met all requirements of an Eligible User as defined in Section 2.7 a;
- b) Verify that the p-ANI Part 1 Form is complete;
- c) Verify that the p-ANI Applicant has provided a detailed explanation, of the need for the requested number of p-ANIs, when the request for p-ANIs

exceeds any applicable ESIF Formula<sup>24</sup>, or exceeds 50 p-ANIs when no formula applies;

7.3.3 When the p-ANI Applicant requests a specific p-ANI or p-ANI range, the RNA shall assign that p-ANI or p-ANI range if it is available. If the p-ANI or p-ANI range is not available, or the p-ANI Applicant did not request a specific p-ANI or p-ANI range, the RNA shall select the p-ANI or p-ANI range for assignment in a sequential order.

7.3.4 The RNA issues the Part 3 - RNA Response/Confirmation Form (Attachment 2) to the p-ANI Applicant as confirmation of the p-ANI assignment.

7.3.5 A p-ANI assigned to a p-ANI Assignee should be placed In Use and reported on the Appendix 2: P-ANI Annual Report. Unused p-ANIs may be subject to reclamation (see Section 8.0), if the p-ANI Assignee identifies that it will not be able to put the p-ANI In Use or if the p-ANI Assignee does not show the p-ANI In Use on the Appendix 2: P-ANI Annual Report.

#### 7.4 P-ANI Transfer Process

The criteria below will apply when the p-ANI is In Use and one of the following conditions is met:

- a) merger or acquisition;
- b) both entities involved mutually agree to the transfer of the p-ANI and coordinate through the RNA (see Section 7.4);
- c) authorization or directive received from the appropriate governmental agency.

All p-ANI transfers must be mutually agreed to by both the relinquishing and receiving parties.

All time intervals applicable to the assignment of a new p-ANI apply in the case of a p-ANI transfer. These intervals do not address the time intervals needed to perform the network and other rearrangements associated with the p-ANI transfer.

The p-ANI Applicant receiving the transferred p-ANI(s) must submit a complete Part 1 P-ANI Application Form (Attachment 1) to the RNA, noting the appropriate changes to be made. In addition, the p-ANI Applicant receiving the transferred p-ANI(s) also must provide written confirmation from the current p-ANI Assignee agreeing to the transfer and

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<sup>24</sup> The ESIF Formula document (ATIS-0500018, *p-ANI Allocation Tables for ESQKs, ESRKs, and ESRDs*) can be obtained at <https://www.atis.org>.

the reason for the transfer to the RNA. The RNA shall ensure that the transfer is mutually acceptable to both parties.

## 7.5 Ongoing Administration of Assigned p-ANI Changes

7.5.1 The information associated with a p-ANI assignment may change over time. The RNA must be notified of such changes as OCN, NENA Company ID 1, PSAP information, company name, Selective Router CLLI information, etc. The requested changes shall be submitted via the Part 1 P-ANI Application Form (Attachment 1). For data integrity reasons, the RNA must be informed of these types of changes to ensure that the record of the entity responsible for the p-ANI and the data associated with the p-ANI is accurate.

7.5.2 If there are 50 or more p-ANIs or p-ANI ranges that need to have modification requests submitted for changes to the OCN, NENA Company ID 1, PSAP information, p-ANI Assignee due to Merger/Acquisition, 24X7 Emergency Contact Number, 9-1-1 Governing Authority, and/or Selective Router CLLI information, a mass modification spreadsheet can be sent to the RNA. A maximum of five hundred rows of p-ANIs or p-ANI ranges may be submitted on a single mass modification spreadsheet. The current spreadsheet can be found on the RNA website ([www.nationalpani.com](http://www.nationalpani.com)).

Note: Mass modifications only update data in the RNA System. SPs are responsible for all updates to any other affected systems or databases.

7.5.3 The resulting Eligible User in a merger/acquisition must revise and provide a new, consolidated Forecast Report (Appendix 1) for p-ANIs. P-ANIs assigned by the RNA or acquired by other means, such as a p-ANI transfer, must be used by the new p-ANI Assignee in a manner consistent with these guidelines. Additionally, the new p-ANI Assignee must participate in the audit process, as necessary.

## 7.6 Replacing Dialable p-ANIs with Non-Dialable p-ANIs

A p-ANI assignee which seeks to replace existing dialable p-ANIs with non-dialable p-ANIs shall indicate in the 'Comments' field of its application that it is a request to replace dialable p-ANIs and list the dialable p-ANIs that are being replaced. The assignee also shall fulfill the responsibilities of a p-ANI applicant, except that the p-ANI assignee will not be required to provide the RNA with documentation establishing that it is entitled to do business in that area, even if it is seeking more non-dialable p-ANIs than it is replacing. This exception exists because the p-ANI assignee has already established this requirement with either the PA or the NANPA.

## 7.7 Duplicate or Overlapping Assigned p-ANIs

7.7.1 The same p-ANI shall not be assigned to more than one SP since it may cause:

- 9-1-1 calls to be routed to the wrong PSAP.
- Incorrect location information, either initial or rebid, to be provided.
- Incorrect SP/selective router information to be provided.

Any of these events could result in delay of emergency response.

7.7.2 Every attempt will be made at the time of assignment to avoid conflicts with existing p-ANIs. When the RNA becomes aware that duplicate or overlapping p-ANI assignments exist, the RNA shall send an email notification to the affected SPs directing them to negotiate a resolution to determine which SP will retain the duplicate or overlapping p-ANI(s). Within 60 days of being notified, both parties shall jointly submit to the RNA an agreed upon execution plan specifying implementation dates. Within 180 days of the RNA's initial notification to the affected SPs, this plan shall be implemented.

Having both SPs retain the duplicate or over-lapping assignments is not considered a resolution.

7.7.3 Once the SPs have implemented the execution plan, the SPs involved shall notify the RNA so the necessary updates can be made in RNAS.

7.7.4 If neither SP responds to the RNA or an execution plan has not been agreed to within the SPs' 60-day timeframe, the RNA shall notify the PSAP and/or the E9-1-1 Governing Authority involved requesting assistance in facilitating a resolution.

7.7.5 If, within 60 days of the RNA notifying the PSAP and/or the E9-1-1 Governing Authority, the RNA still has not received a resolution or execution plan from the SPs, the RNA will contact the appropriate governmental agency.

## **8.0 Reclamation and Return of p-ANIs**

This section outlines the various responsibilities of the p-ANI Assignee and the RNA with respect to the reclamation and return of p-ANIs. In addition, the various circumstances under which reclamation and return of p-ANIs can be initiated are enumerated in this section. Reclamation refers to the process by which p-ANI Assignees are required to return p-ANIs to the RNA under the direction of the appropriate governmental agency.

### **8.1 P-ANI Assignee Responsibility**

8.1.1 The p-ANI Assignee to which a p-ANI or p-ANI range has been assigned shall return the p-ANI or p-ANI range to the RNA if:

- a) it is no longer needed by the entity for the purpose for which it was originally assigned; or

- b) the service for which it was assigned is disconnected.

#### 8.1.2 Duplicate p-ANI Assignment Problem Resolution

Should a p-ANI Assignee discover through its provisioning efforts that its assigned p-ANI or p-ANI range (or any portion thereof) is in use by another entity, the p-ANI Assignee will alert the RNA of the “duplicate” assignment and request a new p-ANI or p-ANI range be assigned.

Upon receiving such a request, the RNA will assign a new p-ANI or p-ANI range to the p-ANI Assignee within five (5) business days via an updated Part 3 - RNA Response/Confirmation Form (Attachment 2).

The RNA will then work with the current user of the “duplicated” p-ANI or p-ANI range (and any other party necessary) to either correct the RNA records to reflect the identity of the p-ANI Assignee or to initiate reclamation as described in Section 8.2.

#### 8.1.3 Mass Returns

If there are 50 or more p-ANIs or p-ANI ranges that need to be returned, a mass return spreadsheet can be sent to the RNA. A maximum of five hundred rows of p-ANIs or p-ANI ranges may be submitted on a single mass return spreadsheet. The current spreadsheet can be found on the RNA website ([www.nationalpani.com](http://www.nationalpani.com)).

Note: Mass returns only make those p-ANIs available in the RNA System. SPs are responsible for removing p-ANIs from any other affected systems or databases.

### 8.2 Routing Numbering Administrator Responsibility

8.2.1 The RNA, as directed by the appropriate governmental agency, will reclaim p-ANI resources in the inventory of p-ANI Assignees’ embedded resources as well as p-ANIs assigned to a p-ANI Assignee by the RNA.

8.2.2 The p-ANI Assignee shall confirm that a p-ANI is In Use via the Appendix 2: P-ANI Annual Report. Unused p-ANIs may be subject to reclamation (see Section 8.2.3).

8.2.3 If the RNA identifies one of the following p-ANI statuses via the P-ANI Annual Report:

- a) Assigned and reported as not In Use within the timeframe specified in these guidelines;
- b) Assigned according to the RNA records, but not reported on the P-ANI Annual Report; or
- c) Assigned and determined to be no longer In Use,



The RNA will, within twenty-one (21) calendar days of the P-ANI Annual Report deadline, request via email that the p-ANI Assignee, within two (2) weeks of the email notification, either return the unused p-ANI or provide an updated P-ANI Annual Report showing that the p-ANI is "In Use" and should remain assigned. If no response is provided or direct contact cannot be made with the p-ANI Assignee, the RNA will send an overnight or registered letter to the p-ANI Assignee's address of record requesting that the p-ANI Assignee respond with an updated P-ANI Annual Report or return the p-ANI within thirty (30) days of receipt. If the letter is returned as non-deliverable or no response is provided, the RNA will seek guidance from the appropriate governmental agency.

If it is determined by the appropriate governmental agency that the p-ANI shall be reclaimed, the p-ANI will be made available for assignment after thirty (30) days from the decision date.

8.2.4 For any p-ANI or p-ANI range returned, the RNA will make the p-ANI or p-ANI range available for re-assignment after a thirty (30) day aging period from the date the request to return the p-ANI or p-ANI range was approved.

### 8.3 Abandoned p-ANIs

A p-ANI is considered abandoned when the RNA is unable to reach the p-ANI Assignee.

When the RNA is notified of an abandoned p-ANI, the RNA will contact the appropriate governmental agency and seek guidance concerning the return of the abandoned p-ANI. Such circumstances are under the direction of a regulatory authority or court. The RNA will not act independently of regulatory authority direction with regard to the reclamation of the abandoned p-ANI.

The RNA will return the abandoned p-ANI or p-ANI range to the p-ANI inventory once written confirmation (e-mail or fax) is received from the appropriate governmental agency directing the RNA to reclaim the p-ANI. The RNA will direct any complaints concerning any disruption of service to the appropriate governmental agency.

## 9.0 Appeals Process

Reports on any resolution resulting from the above options, the content of which shall be mutually agreed upon by the involved parties, shall be kept on file by the RNA. At a minimum, the report shall contain the names of the involved parties, the issues raised, relevant p-ANI(s) and the final disposition of the appeal.

## 10.0 Maintenance of These Guidelines

These guidelines are periodically updated to reflect changes in industry practices, or national regulatory directives. Requests for changes to these guidelines shall be directed to the appropriate industry forum, currently the INC.

Questions regarding these guidelines may be directed to:

Routing Number Administrator (RNA)

Routing Number Administrator

1800 Sutter Street, Suite 780

Concord, CA 94520

888-415-5234

[panisupport@neustar.biz](mailto:panisupport@neustar.biz)

[www.nationalpani.com](http://www.nationalpani.com)

## 11.0 Glossary

9-1-1 Governing Authority	An entity designated under state law or regulation to have decision-making and oversight responsibilities for a 9-1-1 Emergency Number System for one or more PSAPs
Aging p-ANI	<p>A p-ANI not available for assignment to another Eligible User for a specified period of time because it has been recently disconnected and returned or reclaimed</p> <p>A p-ANI is disconnected when it is no longer used for call routing and location display of callers to the serving PSAP. Such p-ANIs must be aged before being made available for assignment. P-ANIs shall be aged for no less than thirty (30) days by the RNA.</p>
Assigned p-ANI	A p-ANI that is assigned to an Eligible User
Assignment Date	The Assignment Date is the date established by the RNA when the RNA officially makes the p-ANI assignment to an Eligible User.
Audit	The accumulation and evaluation of evidence about documented information of an auditee to determine and report on the degree of compliance with these guidelines
Auditee	Any party that is the subject of an audit
Auditor	The appropriate bureau(s) within the FCC or other appropriate governmental entity, or other designated agents that perform audits of p-ANI resources
Automatic Location Identification (ALI)	The automatic display at the PSAP of the caller's telephone number, the address/location of the telephone and supplementary emergency services information of the location from which a call originates
Automatic Location Identification (ALI) Database	The set of ALI records residing on a computer system
Available p-ANI	P-ANIs that may be assigned to Eligible Users and are not classified as Assigned or Aging

Central Office (CO) Code	<p>The sub-NPA code in a TN, i.e., digits D-E-F of a 10-digit NANP Area address</p> <p>Central office codes are in the form "NXX", where N is a number from 2 to 9 and X is a number from 0 to 9. Central office codes may also be referred to as "NXX codes" (47 C.F.R. § 52.7(c)).</p>
Company Code	See "OCN" ( <i>Operating Company Number</i> ).
Dialable p-ANI Number	From a p-ANI perspective, a 10-digit number in the format of NPA-NXX-XXXX, where the digits in "E" and "F" positions of the 10-digit number (ABC-DEF-GHIJ) are not a "1" and the number is used for local or emergency communication purposes
E9-1-1 System Service Providers (E9-1-1 SSP)	<p>An E9-1-1 System Service Provider (E9-1-1SSP), typically but not always an ILEC, provides systems and support necessary to enable 9-1-1 calling for a single or group of Public Safety Answering Points (PSAPs). In relation to the jurisdictional boundary of the PSAP and the system provider's scope of authority, this includes:</p> <ol style="list-style-type: none"> <li>1) A method of interconnection for all telecommunications providers including but not limited to the wireline, wireless, and VoIP carriers;</li> <li>2) A method for routing a 9-1-1 call to the correct PSAP with no degradation in service regardless of the technology to originate the call;</li> <li>3) A method to provide accurate location information for an emergency caller to a PSAP and if required, other emergency response agencies;</li> <li>4) Installation and training of PSAP call handling equipment and other related systems when required; and</li> <li>5) Coordinating with PSAP authorities on issues involving contingency planning, disaster mitigation, and recovery.</li> </ol>

## Eligible User

An "Eligible User" is an entity that:

- 1) Demonstrates that it is permitted under applicable law to access p-ANI resources in the area for which the p-ANI resources are sought;
  - A wireless service provider applicant shall provide the RNA a copy of its FCC license, showing that it is authorized to provide service in the area in which it is seeking resources.
  - Any entity that requires p-ANIs to comply with any state or federal order and that has been certified as a CLEC by a state shall provide the RNA a copy of its state certification showing that it is authorized to provide service in the area in which it is seeking resources.<sup>25</sup>
  - An interconnected VoIP service provider applicant shall provide the RNA with a copy of its FCC nationwide authorization<sup>26</sup>.
  - A VPC provider applicant shall provide documentation from the state or the state's general counsel in the form of<sup>27</sup>:
    1. An order of the commission denying certification, with the reason for the denial being that the state does not certify VPC providers, or
    2. A statement from the state commission or its general counsel that it does not certify VPC providers.The RNA will then retain this information in its records for that VPC provider's future requests for that specific state.
- 2) Has received approval from the 9-1-1 governing authority to route E9-1-1 traffic for termination to a Public Safety Answering Point (PSAP)<sup>28</sup>;
- 3) Has been assigned a valid Operating Company Number (OCN)<sup>29</sup>;
- 4) Has been assigned a valid NENA Company Identifier (ID) 1 by the National Emergency Number Association (NENA)<sup>30</sup>; and
- 5) Self-certifies that it will provide the technical and functional capability to route traffic or provide routing instructions to enable emergency call delivery to a PSAP.

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<sup>25</sup> See Implementation of the NET 911 Improvement Act of 2008, FCC 08-249, at Footnote 66: citing 47 CFR § 52.15(g)(2); see also Footnote 84.

Emergency Routing Data Base (ERDB)	The ERDB contains routing information associated with each Emergency Service Zone (ESZ) in a serving area. It supports the boundary definitions for ESZs and the mapping of civic address or geo-spatial coordinate location information to a particular ESZ.
Emergency Services Interconnection Forum (ATIS ESIF)	ESIF is a standing committee of the Alliance for Telecommunications Industry Solutions (ATIS) and is the primary venue for the telecommunications industry, public safety and other stakeholders to generate and refine both technical and operational interconnection issues to ensure life-saving E9-1-1 services are available for everyone in all situations. ATIS ESIF enables many different telecommunications entities to fully cooperate and interconnect with each other to determine the best practices and solutions necessary to effectively and promptly deploy E9-1-1 services nationwide. ATIS ESIF's mission is to facilitate the identification and resolution of both technical and operational issues related to the interconnection of telephony and emergency services networks.
Emergency Service Number (ESN)	A 3-5 digit number that represents one or more ESZs. An ESN is defined as one of two types: Administrative ESN and Routing ESN (refer to definitions elsewhere in this document).
Emergency Service Query Key (ESQK) (VoIP)	The ESQK identifies an E911 call instance processed through a VoIP Positioning Center (VPC). An ESQK is associated with a particular PSAP or area within a PSAP. The ESQK is delivered to the PSAP as the calling number/ANI for the call, and is subsequently used by the PSAP to request ALI information for the call. The ALI database includes the ESQK in location requests sent to the VPC. The ESQK is used by the VPC as a key to look up the location object and other call information associated with an emergency call instance. The ESQK is a non-dialable North American Numbering Plan (NANP) number in the format of NPA-NXX-XXXX.

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<sup>26</sup> FCC 15-70, ¶ 14 and 47 CFR § 52.15(g)(3).

<sup>27</sup> 47 CFR § 52.15(g)(2).

<sup>28</sup> December 14, 2010 letter from the Wireline Competition Bureau Chief to the NANC Chair and the Director of Number Pooling Services.

<sup>29</sup> See Glossary.

<sup>30</sup> See Glossary.

Emergency Services Routing Digit (ESRD) and Emergency Services Routing Key (ESRK) (Wireless)	A 10-digit number used for the purpose of routing an E911 call to the appropriate Public Service Answering Point (PSAP) when that call is originating from wireless equipment. The Emergency Services Routing Digit (ESRD) identifies the cell site and sector of the call origination in a wireless call scenario. The Emergency Services Routing Key (ESRK) uniquely identifies the call in a given cell site/sector and correlates data that is provided to a PSAP by different paths, such as the voice path and the Automatic Location Identification (ALI) data path. Both the ESRD and ESRK define a route to the proper PSAP. The ESRK alone, or the ESRD and/or Mobile Identification Number (MIN), is signaled to the PSAP where it can be used to retrieve from the ALI database, the mobile caller's call-back number, position and the emergency service agencies (e.g., police, fire, medical, etc.) associated with the caller's location. If a NANP TN is used as an ESRD or ESRK, this number cannot be assigned to a customer. See "Administrative Numbers" definition.
Emergency Service Zone (ESZ)	A geographical area that represents a unique combination of emergency service agencies (e.g., Law Enforcement, Fire and Emergency Medical Service) that are within a specified 9-1-1 governing authority's jurisdiction. An ESZ can be represented by an Emergency Service Number (ESN) to identify the ESZ. (Refer to ESN)
Exchange or Exchange Area	A geographical area established by a BOC for administration and pricing of telecommunications services in a specified area that usually embraces a city, town, or village and its environs
FCC Registration Number (FRN)	A ten-digit number assigned by the Federal Communications Commission (FCC) to an entity that does business with the FCC. A filer, licensee, certificate holder, or any entity sending payments to the FCC is considered to be doing business with the FCC. The FCC uses the FRN to determine if all of an entity's fees have been paid. The FRN is the same number used by entities on FCC Form 499-A and FCC Form 502 (NRUF Report). More information about FRNs can be obtained by calling the FRN Help Line (877-480-3201) or from the following website: <a href="https://fjallfoss.fcc.gov/coresWeb/publicHome.do">https://fjallfoss.fcc.gov/coresWeb/publicHome.do</a> .
Fixed Location Service	A device or service that can only operate from the registered address or location

Industry Numbering Committee (ATIS INC)	Industry Numbering Committee (INC) provides an open forum to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of numbering resources and related dialing considerations for public telecommunications within the North American Numbering Plan (NANP) area.
Interconnected Voice over Internet Protocol (VoIP) Service Provider	<p>An entity that provides interconnected VoIP service, as that term is defined in 47 U.S.C. § 153(25) (47 CFR § 52.5 (b)).</p> <p>Interconnected VoIP providers are providers of a service that (1) enables real-time, two way voice communications, (2) requires a broadband connection from the user's location, (3) requires Internet protocol-compatible customer premises equipment, and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network (47 CFR § 9.3).</p>
In Use	A p-ANI that has been provisioned in the serving E9-1-1 network and is being used for emergency communications purposes with the appropriate PSAP
Inventory	<p>The term "inventory" refers to all telephone numbers distributed, assigned or allocated:</p> <ol style="list-style-type: none"> <li>1) To a p-ANI Assignee; or</li> <li>2) To the RNA for the purpose of establishing or maintaining a p-ANI number pool.</li> </ol>
(Industry) Inventory Pool	Used in p-ANI Administration to describe a reservoir of unallocated p-ANIs administered by the RNA for purposes of assignment to Eligible Users



Mobile Position Center  
(MPC)

The MPC serves as the point of interface to the ANSI wireless network for the Emergency Services Network. The MPC serves as the entity which retrieves, forwards, stores and controls position data within the location network. It can select the PDE(s) to use in position determination and forwards the position to the requesting entity or stores it for subsequent retrieval. In the case of a PDE with autonomous determination capability, the MPC receives and stores the position estimation for subsequent retrieval. The MPC may restrict access to position information (e.g., require that the mobile subscriber be engaged in an emergency service call or only release position information to authorized nodes).

North American  
Numbering Council  
(NANC)

On October 5, 1995, the Federal Communications Commission (FCC) established the North American Numbering Council (NANC), by filing its charter with Congress, to provide advice and recommendations to the FCC and other governments (including Canada and Caribbean countries) on numbering issues.

North American  
Numbering Plan (NANP)

A numbering architecture in which every station in the NANP area is identified by a unique ten-digit address consisting of a three-digit NPA code, a three digit central office code of the form NXX, and a four-digit line number of the form XXXX, where N represents the digits 2-9 and X represents the digits 0-9.

It is the basic numbering scheme for the telecommunications networks located in Anguilla, Antigua, Bahamas, Barbados, Bermuda, British Virgin Islands, Canada, Cayman Islands, Dominica, Dominican Republic, Grenada, Jamaica, Montserrat, Sint Maarten, St. Kitts & Nevis, St. Lucia, St. Vincent, Turks & Caicos Islands, Trinidad & Tobago, and the United States (including American Samoa, Puerto Rico, the U.S. Virgin Islands, Guam, and the Commonwealth of the Northern Mariana Islands) [See also 47 CFR §52.5 (d)].

National Emergency  
Number Association  
(NENA)

NENA is a professional non-profit organization, established to promote implementation and awareness of 9-1-1 as the U.S. and Canadian universal emergency number. NENA provides a forum for dialogue between and among public safety and industry partners. NENA serves its members through policy advocacy, establishment of technical and operational standards, certification programs and a broad spectrum of educational offerings.

NENA Company ID

NENA Company Identifier (ID) 1 is a 3-5 character identifier, that distinguishes the entity providing voice service (e.g., Wireline, Wireless, VoIP, PBX, etc.) to the end user. The company identifier registry is maintained by NENA in a nationally accessible data base.

NENA Company-ID 2 - A 3-5 character identifier, that distinguishes the source of the ALI record information (e.g., service provider/reseller/private switch owner)

Dependent on 9-1-1 service provider and/or PSAP capabilities either only company-ID 1 or both 1 and 2 display at the PSAP in the delivered ALI record

A company-ID can be requested on-line at [www.nena.org](http://www.nena.org) – follow company-ID section link and then choose ‘sign up for new company ID’ option.

Non-Dialable p-ANI  
Number

From a p-ANI perspective, a 10-digit number used for emergency communications in the form of NPA-N11-XXXX

The 10-digit numbers within N11 central office codes are unavailable for assignment to an individual subscriber, but are used for local or emergency communication purposes. However, the central office code “911” is excluded from use as a p-ANI resource to ensure NPA-911-XXXX can continue to be used to represent a problem condition at the PSAP.

## NPA

Numbering Plan Area, also called area code

An NPA is the 3-digit code that occupies the A, B, and C positions in the 10-digit NANP format that applies throughout the NANP Area. NPAs are of the form NXX, where N represents the digits 2-9 and X represents any digit 0-9. In the NANP, NPAs are classified as either geographic or non-geographic.

Geographic NPAs are NPAs which correspond to discrete geographic areas within the NANP Area.

Non-geographic NPAs are NPAs that do not correspond to discrete geographic areas, but which are instead assigned for services with attributes, functionalities, or requirements that transcend specific geographic boundaries. The common examples are NPAs in the N00 format, e.g., 800.

## OCN (Operating Company Number)

An Operating Company Number (OCN) is a four place alphanumeric code that uniquely identifies providers of local telecommunications service. OCN assignments are required of all SPs in their submission of utilization and forecast data (FCC 00-104, ¶ 41 and Public Notice DA 00-1549). Relative to CO Code assignments, NECA assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments contact NECA ([www.neca.org](http://www.neca.org); 800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to the iconectiv® Telecom Routing Administration (TRA) ([www.trainfo.com](http://www.trainfo.com); 866-672-6997). The OCN must be associated with a NECA Company Code (OCN) Category Type that has been determined to be appropriate for the direct assignment of numbering resources. The following is the list of permitted Company Code Category Types for numbering resources:

Incumbent Local Exchange Carrier	ILEC
Regional Bell Operating Company	RBOC
Competitive Local Exchange Carrier	CLEC
Personal Communications Service	PCS
Unbundled Local Exchange Carrier	ULEC
Wireless Carriers	WIRE
Internet Provider Enabled Services interconnected VoIP)	IPES (only

Position Determining Entity (PDE)	The PDE determines the precise position or geographic location of a wireless terminal when the mobile subscriber starts a call or while the mobile subscriber is engaged in a call. Each PDE supports one or more position determining technologies. Multiple PDEs may service the coverage area of an MPC and multiple PDEs may serve the same coverage area of an MPC utilizing different positioning determining technologies. (PDE is synonymous with Location Determination Technology (LDT)).
Pseudo-Automatic Number Identification (p-ANI)	A 10-digit number used for the purpose of routing an E911 call to the appropriate Public Service Answering Point (PSAP). P-ANIs include but are not limited to: ESRD, ESRK, and ESQK numbers. If a NANP TN is used as a p-ANI, this number cannot be assigned to a customer. See “Administrative Numbers” definition.
Pseudo-Automatic Number Identification (p-ANI) In Use Deadline	A p-ANI assignee shall place a p-ANI or p-ANI range In Use within six months of the original Assignment Date returned on the Part 3 RNA Response/Confirmation Form (Attachment 2). In addition, the p-ANI assignee shall report the p-ANI or p-ANI range In Use status in the next p-ANI Annual Report (Appendix 2) annual submission.
Pseudo-Automatic Number Identification (p-ANI) Assignee	The Eligible User to which a p-ANI has been assigned for use
Public Safety Answering Point (PSAP)	A facility equipped and staffed to receive 9-1-1 calls
Rate Center	Rate Center is used for numbering resource applications and reports to associate telephone numbers with a geographic area, as defined by the relevant regulatory agency. A Rate Center is also a uniquely defined point located within an exchange area from which mileage measurements are determined. These measurements can be used with the tariffs in the message rating processes.
Routing Number Administrator (RNA)	The neutral, third-party entity, contracted by the Federal Communications Commission, responsible for the assignment of non-dialable p-ANI numbers to Eligible Users

Selective Router CLLI™:	An 11-character code assigned to a central office to designate the physical location and area served. Characters 1-4 designate the rate center location, characters 5-6 designate the state code, characters 7-8 identify the central office, and characters 9-11 specify the equipment type. In particular, characters 9-11 will be in a unique format designated for the use of a selective router as determined by iconectiv® Common Language® Location Information Service.
Selective Routing (SR):	<p>The routing of a 9-1-1 call to the proper PSAP based upon the location of the caller</p> <p>Selective routing is controlled by the ESN/ESZ which is derived from the customer location.</p>
Selective Routing Data Base (SRDB):	The routing table that contains telephone number to ESN relationships which determines the routing of 9-1-1 calls
Unavailable p-ANI	A p-ANI that shall not be assigned to Eligible Users because it is set aside for some specific purpose. Unavailable p-ANIs cannot be classified as Assigned, Aging, or Available.
Voice over Internet Protocol (VoIP) Positioning Center (VPC)	The element that provides routing information to support the routing of VoIP emergency calls, and cooperates in delivering location information to the PSAP over the existing ALI DB infrastructure. The VPC supports access to the routing data in the ERDB.

## 12.0 Reference

Referenced documents can be found at [www.atis.org/inc](http://www.atis.org/inc) or by contacting [inc@atis.org](mailto:inc@atis.org).

- North American Numbering Council (NANC) P-ANI Interim Assignment Guidelines for ESQK, December 5, 2005.
- Letter from Thomas J. Navin, Chief, Federal Communications Commission Wireline Competition Bureau to Thomas M. Koutsy, Chair, North American Numbering Council and Amy Putnam, Director, NeuStar Pooling Services; September 8, 2006.
- North American Numbering Council (NANC) Recommendations For Permanent P-ANI Administration, November 30, 2006.
- ~~ATIS Thousands Block (NPA-NXX-X) Pooling & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG, ATIS-03000660300119). (NOTE: consider deleting this altogether since the TBCOCAG is not mentioned in these p-ANI guidelines)~~
- December 14, 2010 letter from the Wireline Competition Bureau Chief to the NANC Chair and the Director of Number Pooling Services.
- FCC 15-70, Report and Order In the Matter of Numbering Policies for Modern Communications WC Docket No. 13-97, IP-Enabled Services WC Docket No. 04-36, Telephone Number Requirements for IP-Enabled Service Providers, WC Docket No. 07-243, Telephone Number Portability, CC Docket No. 95-116, released June 22, 2015 are referenced by the footnote in the format "FCC15-70..."