

NeuStar Letter to FCC 9/12/01

Subject: NeuStar Network Update

I am sending you this message to inform you of NeuStar's ongoing actions in support of carriers who are experiencing service difficulties resulting from yesterday's terrorist attacks. First, all NeuStar systems are up and running. There have been no interruptions to our services to carriers. However, since several of our carrier customers have facilities in lower Manhattan there may be assistance required from us to restore or, in some places, continue to provide service.

We have had contact with several of our customers and are in the process of communicating widely to our entire customer base. We are also in the process of contacting the relevant state commissions and the NARUC to inform them of our status, what we are hearing from our customers, and offering the support needed to their efforts in this difficult time. Further, we are in ongoing communication with the Common Carrier Bureau informing them of steps we are taking, and ready to respond to requests made by the Bureau.

It is unclear still what damage carriers in the areas subjected to yesterday's attacks have sustained from both a personnel and network perspective, but in anticipation of problems they may experience in providing continued service to their end users, we have identified some options to support their efforts. I identify below two of the types of options that are available and are working with the parties indicated above to determine whether there are other steps we may need to take.

1. Individual Number Porting Out of Rate Centers and Possibly Interstate.
Individual numbers may be ported between switch locations. This may involve porting numbers from the original damaged switch location to alternate rate centers that may be adjacent or even out of state. This may, in some instances involve porting numbers to alternative carriers that may have facilities to support the impacted customers. Specifically, this could involve porting numbers that otherwise would be in a NYC switch to a switch in some other area either inside or outside NYC. As noted above, this could involve geographic porting that could be interstate.
2. Central Office Code Transfer Process. Another option is one that involves central office code transfers. This process was to be presented to the North American Numbering Council at yesterday's meetings. At the request of the industry, NeuStar presented to NAPM LLC (North American Portability Management, LLC) a Central Office Code Transfer process plan. This transfer process was developed for problems in the industry related to carrier business failure but it may also be useful in the crisis at hand. When it was presented last week, the NAPM LLC did not object to the proposal for CO code transfers and, as noted above, it was our intent to present the plan to the NANC at yesterday's scheduled meetings.

In very general terms, here is how it works. If a carrier ceases providing service without sufficient notice and CO codes become stranded, there may be a need to transfer CO codes between carriers to ensure continued service for end users. This is done technically through a pooling technique that in some instances could involve several carriers and several switching centers. As with the individual number porting technique identified above, this technique may involve rate center and interstate transfers. Using this process we can port the CO Codes for one carrier's switches to an alternate switch where they where they might have facilities to provide service to their end users.

We will continue to update the Common Carrier Bureau of our actions throughout this period. If you would like additional updates or information, please do not hesitate to contact NeuStar.