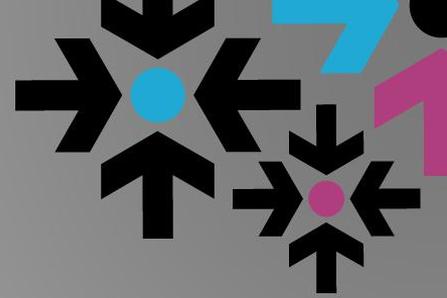




# Policy Implementation and Experience Report

Lisa Liedel, Director of Registration Services

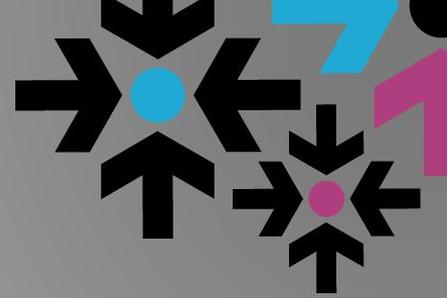


# Transfers and Multiple Discrete Networks (MDN)

We are seeking guidance from the community regarding our current implementation of transfers and MDN.

- There is no specific MDN policy in reference to 8.3 or 8.4 Transfers
- We have been encountering organizations seeking to receive a transfer under section 8.3 that:
  - Are operating MDNs
  - Overall, the organization doesn't meet the utilization requirements in section 8.5.6
  - But one or two of the MDNs individually meet the utilization requirements

# Transfers and Multiple Discrete Networks (MDN) cont.



Do you feel it is reasonable to review each discrete network as if it were “stand alone entity” IF they:

- Provide justification that each network is discrete (borrowed from section 4.5 items 1 - 6)
- Each discrete network meets the 2-yr projection requirements in section 8.5.5
- Each discrete network meets the utilization requirement in section 8.5.6

Thanks!

Any  
Questions?

