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July 23, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-2000-374

FILED²
JUL 23 2001
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find the original and 8 copies of the **Office of the Public Counsel's Motion to Further Postpone Implementation Dates for 314 NPA and 816 NPA Relief Plans**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Very truly yours,

Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Counsel of Record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUL 23 2001

Missouri Public
Service Commission

In the Matter of the North American)
Numbering Plan Administrator's Petition)
for Approval of NPA Relief Plan for the)
314 and 816 Area Codes)

Case No. TO-2000-374

**OFFICE OF THE PUBLIC COUNSEL'S
MOTION TO FURTHER POSTPONE IMPLEMENTATION DATES
FOR 314 NPA AND 816 NPA RELIEF PLANS**

COMES NOW the Office of the Public Counsel (Public Counsel) and respectfully asks the Missouri Public Service Commission to make and enter its order further postponing the implementation of the 314 NPA and 816 NPA relief plans. Public Counsel states that the status of NXX utilization in both the 314 NPA and 816 NPA continues to support the postponement and extension of the implementation dates for the NPA relief plans. In addition, national number pooling is on the horizon. Whether numbers are conserved under the roll-out of the national pooling effort or under a state number pooling project, the St. Louis and Kansas City metropolitan areas have the opportunity to reap the benefits to extend the NPA exhaust dates. The evidence provided by the experiences in other states shows that number pooling can delay the implementation of new area codes, a prospect that could also well serve Missouri. Simply put, number conservation is working. There is no justification for moving forward with implementation plans that will ultimately lead to significant unnecessary cost, inconvenience, and confusion for telephone customers. For this reason, Public

Counsel asks that the implementation dates be further postponed until such time as the remaining NXX codes in 314 reaches 90 and 100 in 816.

In support of its Motion, Public Counsel suggests as follows:

1. Throughout this proceeding, Public Counsel has questioned the need for such an early implementation of NPA relief in 314 and in 816, noting that the current North American Numbering Plan Administrator's (NANPA or Neustar) estimates of NXX exhaust were not supported by the rate of code utilization. In addition, conservation measures were not factored into the NANPA's projections. Public Counsel strongly supported conservation measures to postpone adding new area codes, especially overlay codes, as long as possible to relieve consumers of the burden of area code relief.

Consumers should not suffer the cost, confusion, and inconvenience of a new area code before it is needed. In the evidentiary hearing and in its briefs, Public Counsel urged conservation measures be vigorously pursued to extend the life of 314 and 816 to avoid implementing new NPAs prematurely.

2. In March 2001, Public Counsel asked the Public Service Commission to postpone the NPA implementation dates. Information on central code usage from the NANPA indicated that the forecasted exhaust for 314 and 816 was seriously overstated. The forecast did not reflect the current slow rate of NXX utilization,, and did not recognize the positive effect of number conservation efforts made under the PSC's and the FCC's orders.

3. On April 17, 2001, the Public Service Commission, acting on OPC's motion, ordered the extension of the implementation dates as follows:

314

Permissive dialing: January 1, 2002
Mandatory dialing: May 5, 2002

816

Permissive dialing: May 5, 2002
Mandatory dialing: September 8, 2002

4. On July 13, 2001, the Public Service Commission Staff, Southwestern Bell and other industry representatives filed a Joint Motion to slightly modify the implementation dates to avoid the New Year's Day holiday and Mother's Day, traditional heavy calling days. While Public Counsel does not object to fine-tuning of implementation dates to accommodate customer-calling patterns, Public Counsel suggests that moving ahead with unnecessary relief planning would be a disservice to customers. The implementation dates should be further postponed to a realistic implementation schedule given the status of NXX utilization, the prospects of number pooling, and the need to avoid unnecessary consumer costs, inconvenience, and confusion from premature NPA relief.

5. On June 1, 2001, NANPA issued its 2001 NRUF and NPA Exhaust Analysis (posted at its website <http://www.nanpa.com>) and attached as Exhibit B to Public Counsel's motion. This update estimates the exhaust dates and the change in the projections from last year for the Missouri NPAs as follows:

<u>NPA</u>	<u>CURRENT PROJECTION</u>	<u>PRIOR PROJECTION</u>	<u>NET CHANGE BY QUARTER</u>
314	2Q 2002	2Q 2001	+4
816	1Q 2004	1Q2002	+4
573	1Q 2008	4Q 2005	+9
417	3Q 2008	1Q 2005	+14

636	1Q 2008	1Q 2008	0
660	4Q 2021	1Q2020	+7

6. Public Counsel's original proposal offers a realistic methodology to schedule NPA relief. Rather than tying itself to fixed dates for NPA implementation, Public Counsel urges the Public Service Commission to adopt a flexible implementation date that would be triggered by the remaining inventory of NXXs in each NPA. Public Counsel suggests that any further relief planning should cease until the number of available codes falls to 90 in 314 and 100 in 816.

314 NPA

7. Public Counsel asks the PSC to again delay implementing the new 557 overlay NPA in light of the continuing change in circumstances relating to the projected NXX exhaust in the 314 NPA. Missouri should take advantage of the nearly static demand for codes as well as the benefits of current number conservation measures and prospective number pooling activity at the national and state level to give new life to the 314 NPA and avoid a new area code for as long as possible.

An analysis of available NXX codes in the 314 NPA shows that assignment to carriers has not occurred to the extent projected. The number conservation efforts directed by both the FCC and the PSC have been effective in reigning in code usage. A net of only about 10 codes have been used in the past three quarters which is roughly the same period during which the new requirements for carriers to demonstrate need prior to receiving codes and reclamation efforts have been ramping up. The effects of

conservation are even more pronounced by narrowing the examination to activity to date in 2001. There were 151 codes available as of the end of June, 2001; this is **4 more codes than were available at the beginning of the year**. The conservation effort designed to reclaim assigned, but unused codes, is meeting with success. So far in 2001, 20 codes have been recovered.

The NANPA recently extended its projected exhaust date for the 314 area code until the second quarter of 2002. This is one year later than its previous projection. However, Public Counsel believes that this new projection still grossly overestimates the level and rate of code usage. NANPA's projection suggests that about 150 codes will be used over the next year. The facts, however, do not support such a projection when actual net code assignments in 314 demonstrate little, if any, net change in the number of available codes. *See*, the Summary of Central Code Usage (attached to Public Counsel's motion as Exhibit A) for the history of code usage in 314.

As of July 26, 2000, there were 160 NXXs available for assignment in 314. The projected life of 314 was the 2nd quarter 2001, based on NANPA's estimated demand for codes of 10-13. At that time, Public Counsel provided evidence that NANPA's projections were not reflective of actual usage or the potential impact of number conservation. Public Counsel recommended that the final decision on the specific relief plan be stayed until the number of assignable codes fell below 90. (Meisenheimer Direct, Ex. 3, p. 31-32).

8. In light of this level of code usage and the outlook for number pooling, it is reasonable and in the public interest to delay implementation of the new overlay code for as long as possible to extend the life of 314 and postpone the adverse consumer

impact caused by NPA relief. Postponement of the present schedule is possible without putting the area at risk to exhaust and still have a sufficient NXX supply and thousand-number blocks for pooling.

816 NPA

9. Public Counsel asks the PSC to delay implementing the new 975 Overlay NPA in order to take advantage of current number conservation measures and number pooling to extend the life of the 816 NPA. An analysis of available NXX codes in the 816 NPA shows that assignment to carriers has not occurred to the extent projected.

As of June 26, 2000, there were 174 NXXs available for assignment in 816. Exhaust was not projected for almost 2.4 years (without number conservation). The 816 NPA was not in "jeopardy." However, NANPA moved forward with relief planning apparently for the convenience of NANPA and the industry. Public Counsel provided evidence that once again NANPA's projections did not reflect actual code usage or the potential impact of reclamation or number conservation. Instead of moving forward with relief planning, Public Counsel recommended that the final decision on the specific relief plan be stayed until the number of assignable codes fell below 100. (Meisenheimer Direct, Ex. 3, p. 31-32).

Currently, the 816 area code is seeing similar trends in demand and code usage as in 314. Since the end of July of last year, a net of only about 3 codes have been used. As of the end of June, 2001, there are 185 codes available. **This total is 9 more than were available when the year began.** The conservation effort designed to reclaim assigned, but unused codes, is meeting with success. In 2001, 50 codes have been recovered.

The NANPA has revised its projected exhaust date for the 816 area code to the first quarter of 2004. This is 2 years longer than its previous projection. One might reasonably ask themselves, why are we even considering relief issues for 816. Public Counsel believes that, like in the 314 NPA, NANPA's revised projection also overestimate the level and rate of code usage. NANPA's projection suggests that approximately 17 codes per quarter or 6 per month will be used over the next few years. Once again, the facts do not support that assumption. The actual net code assignments demonstrate a gain in the number of available codes. Furthermore, they do not reflect pooling which should occur during the remaining life of 816.

Public Counsel suggests that it is a reasonable response to the current status of code usage and conservation prospects and in the public interest to delay implementation of the new overlay code for as long as possible to extend the life of 816 and to postpone the adverse consumer impact caused by NPA relief. The industry's recommended overlay of 816 was premature. In contrast, Public Counsel urged conservation measures be vigorously pursued to extend the life of 816. Public Counsel's position regarding the best course of action remains unchanged and strongly urges the PSC to suspend any further consideration of area code relief for 816 and instead encourage the industry to focus its efforts toward number pooling and other conservation efforts that will benefit consumers by pushing the need for a new NPA even farther in the future.

BOTH NPAs

10. The PSC recognized that the area code situation was a fluid condition and that the parties and the PSC should be in a position to react and make course changes as

necessary. In its *Order Approving the 816 NPA Relief Implementation Plan and Directing Filing*, February 15, 2001, the PSC said at page 2:

“The Commission notes that it specifically reserved authority in its R&O to substitute an NPA in the national rollout schedule for thousands-block number pooling. Should code utilization rates for the 816 and 975 NPA moderate or numbering resources be utilized more effectively as the result of number pooling or other optimization strategies, the Commission may consider on its own motion or on the motion of a party, extending the implementation dates for the permissive and mandatory dialing periods.”

11. Number pooling can extend 816 and 314. Public Counsel asks the PSC to consider the impact number pooling has had in other states in postponing exhaust deadlines. (See, Exhibit B, 2001 NRUF and NPA Exhaust Analysis) A few examples are enlightening:

<u>STATE</u>	<u>AREA CODE</u>	<u>NEW EXHAUST</u>	<u>PRIOR EXHAUST</u>		<u>POOLING</u>
ME	207	20053Q	20023Q	+12	6/00
NY	212/646	20061Q	20032Q	+11	4/01
COLO	303/720	20063Q	20043Q	+8	5/01
CA	310	20023Q	20014Q	+3	3/00
NY	315	20041Q	20021Q	+6	2/01
ILL	312	20023Q	20021Q	+2	8/99
NE	402	20033Q	20012Q	+9	5/01

12. Based on a reasonable view of the data, code usage trends, and present and up coming conservation activity, Public Counsel submits that Missouri does not need NPA overlays for the foreseeable future in either 314 or 816. The entire goal of conservation and pooling is to give greater life to NPAs. To continue to move ahead with current plans to implement overlay relief plans at this time is a waste of industry and

governmental time and resources and poses an unnecessary burden on the consumers- a burden which may not even materialize in the near future under conservation programs. Public Counsel suggests that the best course of action would be for the Commission to adopt Public Counsel's recommendation that the initiation of relief activities be tied to and triggered by the level of available codes in a NPA.

For these reasons, Public Counsel asks the Public Service Commission to revise the 314 and 816 NPA relief plans implementation schedule and extend the dates for permissive and mandatory dialing in accordance with Public Counsel's original suggestions. The 816 area code (even according to NANPA's projections) appears to have sufficient life to be included in the national pooling rollout prior to exhaust.

However, the opportunity for 314 to benefit from pooling prior to exhaust hinges on NANPA's projected exhaust date since the selection criteria established by the FCC requires an NPA to have more than a year of remaining life left.. Public Counsel strongly recommends that the Commission request that NANPA reevaluate the expected exhaust projection for 314, which currently may pose a barrier to 314 being included in the early phases of the national roll-out of number pooling. As a precautionary measure, Public Counsel encourages the Commission to commence the process for trial number pooling in 314 in the event that Missouri's participation in the national pooling project is delayed due to unrealistic projections regarding the remaining life of 314.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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By: 

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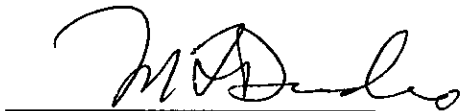
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed via U. S. Mail postage prepaid on this 23 day of July, 2001 to the counsel of record on the attached service list.



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July 23, 2001

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Summary Of Central Office Code Usage

Area Code 314		
Month Ending	Net Code Assignments*	Available As Of
Jan-00	-	228
Feb-00	7	221
Mar-00	11	210
Apr-00	9	201
May-00	3	198
Jun-00	8	190
Jul-00	17	173
Aug-00	9	164
Sep-00	3	161
Oct-00	4	157
Nov-00	9	148
Dec-00	1	147
Jan-01	2	145
Feb-01	1	144
Mar-01	-6	150
Apr-01	0	150
May-01	2	148
Jun-01	-3	151

Area Code 816		
Month Ending	Net Code Assignments*	Available As Of
Jan-00	-	241
Feb-00	4	237
Mar-00	3	234
Apr-00	3	231
May-00	2	229
Jun-00	19	210
Jul-00	22	188
Aug-00	2	186
Sep-00	3	183
Oct-00	4	179
Nov-00	1	178
Dec-00	2	176
Jan-01	10	166
Feb-01	-9	175
Mar-01	-18	193
Apr-01	0	193
May-01	8	185
Jun-01	0	185

* Calculated as the difference in available codes from from one month to the next based on the monthly available codes reported in the 2000 and 2001 Activity Reports viewable at www.nanpa.com.

NPA exhaust projections contained herein may change based on demand for numbering resources and will be modified or revised by the NANPA as new data becomes available and are analyzed.

2001 NRUF and NPA Exhaust Analysis** June 1, 2001 Update

Sorted by State

Locality	NPA	Apr 01	Prev Fcst	Quarter*** +/-	Notes
Alabama	205	2004 3Q	2003 2Q	(+5)	
Alabama	251	2011 1Q		(NA)	New NPA
Alabama	256	2004 4Q	2004 4Q*	(0)	
Alabama	334	2005 3Q	2002 2Q	(+13)	
Alaska	907	2006 2Q	2006 3Q	(-1)	
Arizona	480	2008 2Q	2008 2Q*	(0)	
Arizona	R 520	2002 1Q	2001 3Q	(+2)	
Arizona	602	2006 1Q	2006 1Q*	(0)	
Arizona	623	2020 4Q	2010 3Q	(+41)	Decrease in code demand
Arkansas	501	2002 1Q	2002 4Q	(-3)	
Arkansas	870	2006 1Q	2006 3Q*	(-2)	
California	209	2005 2Q	2004 3Q	(+3)	
California	213	2007 2Q	2006 2Q*	(+4)	
California	R 310	2002 3Q	2001 4Q	(+3)	Forecast reflects impact of pooling implemented on 3/00; Relief planning suspended
California	323	2003 3Q	2003 4Q	(-1)	
California	R 408	2004 1Q	2004 2Q	(-1)	Relief planning suspended; Forecast reflects impact of pooling implemented 5/01
California	R 415	2003 4Q	2002 3Q	(+5)	Relief planning suspended; Pooling in place as of 7/00
California	510	2003 3Q	2003 3Q	(0)	Relief planning suspended; Forecast reflects impact of pooling planned for 7/01
California	R 530	2005 1Q	2004 4Q	(+1)	
California	559	2006 1Q	2005 1Q	(+4)	
California	562	2006 3Q	2001 4Q	(+19)	Forecast reflects impact of pooling planned for 11/01
California	619	2007 1Q	2004 4Q	(+9)	Relief suspended; Forecast reflects impact of pooling planned for 10/01
California	626	2005 4Q	2005 1Q	(+3)	
California	650	2005 2Q	2003 2Q	(+8)	Relief planning suspended; Forecast reflects impact of pooling planned for 6/01
California	661	2006 1Q	2005 2Q*	(+3)	
California	R 707	2005 2Q	2005 1Q*	(+1)	
California	R 714	2003 2Q	2002 3Q	(+3)	Relief planning suspended; Pooling in place as of 10/00
California	R 760	2004 3Q	2004 2Q*	(+1)	
California	R 805	2003 4Q	2003 4Q	(0)	
California	R 818	2003 3Q	2003 4Q	(-1)	Forecast reflects impact of pooling implemented on 3/01
California	831	2008 4Q	2007 4Q*	(+4)	
California	858	2009 3Q	2005 4Q*	(+15)	NPA Relief Implemented; Forecast reflects impact of pooling planned for 12/01

R = Relief date based upon rationing amount

NA = Not Applicable

* = Indicates a new forecast has been published since the May 2000 forecast

** = Code data used for study as of 3/1/01; Canadian data as of 1/1/01

*** = The quarterly change column shows a positive number if the exhaust date moved out from the previous forecast and a negative number if the exhaust date moved in

NPA exhaust projections contained herein may change based on demand for numbering resources and will be modified or revised by the NANPA as new data becomes available and are analyzed.

2001 NRUF and NPA Exhaust Analysis**
June 1, 2001 Update

Locality		NPA	Apr 01	Prev Fcst	Quarter***	Notes
California	R -	909	2003 2Q	2002 4Q	(+2)	Relief planning suspended; Pooling in place as of 12/00
California		916	2005 2Q	2003 3Q	(+7)	Pooling in place as of 12/00
California		925	2007 4Q	2004 3Q	(+13)	Forecast reflects impact of pooling planned for 9/01
California	R	949	2006 3Q	2006 1Q	(+2)	
Canada		204	2017 4Q	2015 4Q	(+8)	
Canada		250	2007 4Q	2009 4Q	(-8)	
Canada		306		2016 1Q	(NA)	306 is not projected to exhaust prior to 2021
Canada		403	2008 4Q	2009 3Q	(-3)	
Canada		416/647	2011 4Q	2009 1Q	(+11)	
Canada		418	2010 4Q	2011 4Q	(-4)	
Canada		450	2017 4Q	2020 4Q	(-12)	
Canada		506		2021 2Q	(NA)	506 is not projected to exhaust prior to 2021
Canada		514	2005 4Q	2004 2Q	(+6)	
Canada		519	2006 4Q	2006 1Q	(+3)	
Canada		604		2004 3Q	(NA)	604 is not projected to exhaust prior to 2021
Canada		613	2007 4Q	2005 1Q	(+11)	
Canada		705		2020 3Q	(NA)	705 is not projected to exhaust prior to 2021
Canada		709		2021 3Q	(NA)	709 is not projected to exhaust prior to 2021
Canada		778	2012 4Q		(NA)	New NPA
Canada		780	2012 4Q	2012 3Q	(+1)	
Canada		807			(NA)	807 is not projected to exhaust before 2021
Canada		819	2007 4Q	2006 1Q	(+7)	
Canada		867			(NA)	867 is not projected to exhaust prior to 2021
Canada		902		2015 3Q	(NA)	902 not projected to exhaust prior to 2021
Canada		905/289	2011 2Q	2002 1Q	(+37)	Impact of 289 Relief Overlay
CNMI		670	2307 2Q	2307 2Q	(0)	
Colorado		303/720	2006 3Q	2004 3Q*	(+8)	Forecast reflects impact of pooling implemented on 5/01
Colorado		719	2009 3Q	2009 3Q*	(0)	
Colorado		970	2008 1Q	2008 1Q	(0)	
Connecticut	R	203	2001 4Q	2001 3Q	(+1)	Forecast reflects impact of pooling implemented on 2/01
Connecticut		860	2001 3Q	2002 1Q*	(-2)	Pooling in place as of 10/00
Delaware		302	2005 3Q	2003 4Q	(+7)	
Florida		305-A	2002 3Q	2001 4Q	(+3)	305 capped. Codes will be assigned if they become available; Florida Keys only; Forecast reflects impact of pooling implemented on 5/01
Florida		305/786	2006 4Q	2004 3Q	(+9)	Excludes the Keys
Florida		321-A	2005 2Q	2005 2Q*	(0)	Brevard County only

R = Relief date based upon rationing amount

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*** = The quarterly change column shows a positive number if the exhaust date moved out from the previous forecast and a negative number if the exhaust date moved in

NPA exhaust projections contained herein may change based on demand for numbering resources and will be modified or revised by the NANPA as new data becomes available and are analyzed.

2001 NRUF and NPA Exhaust Analysis** June 1, 2001 Update

Locality		NPA	Apr 01	Prev Fcst	Quarter***	Notes
Florida		321/407	2004 1Q	2003 4Q*	(+1)	
Florida		352	2008 1Q	2008 1Q	(0)	
Florida		386	2018 4Q		(NA)	New NPA
Florida		561	2002 4Q	2002 3Q	(+1)	Forecast reflects impact of pooling implemented on 4/01
Florida		727	2005 2Q	2005 2Q*	(0)	
Florida		813	2006 4Q	2006 4Q	(0)	
Florida		850	2005 1Q	2004 3Q	(+2)	
Florida		863	2011 4Q	2007 3Q	(+17)	NPA Relief Implemented
Florida		904	2009 1Q	2002 1Q	(+28)	NPA Relief Implemented; Forecast reflects impact of pooling implemented on 4/01
Florida		941	2003 3Q	2003 1Q	(+2)	
Florida	R	954	2002 4Q	2002 3Q	(+1)	Forecast reflects impact of pooling implemented on 1/01
Georgia		229	2019 3Q	2019 2Q	(+1)	
Georgia		404	2003 4Q	2004 2Q	(-2)	
Georgia		478	2022 2Q	2022 2Q	(0)	
Georgia	R	678/770	2001 4Q	2001 1Q	(+3)	
Georgia		706	2003 1Q	2002 4Q	(+1)	
Georgia		912	2015 3Q	2008 3Q	(+28)	NPA Relief Implemented
Guam		671	2173 4Q	2173 4Q	(0)	
Hawaii		808	2008 3Q	2006 2Q	(+9)	
Idaho		208	2003 3Q	2003 1Q	(+2)	
Illinois		217	2004 2Q	2004 2Q*	(0)	
Illinois		224/847	2016 3Q	2016 2Q	(+1)	Pooling in place as of 6/98
Illinois		309	2006 4Q	2010 1Q	(-13)	Increase in code demand
Illinois		312	2002 3Q	2002 1Q	(+2)	Pooling in place as of 8/99
Illinois	R	618	2002 3Q	2004 3Q	(-8)	
Illinois		630	2001 3Q	2000 4Q	(+3)	Pooling in place as of 8/99
Illinois		708	2004 1Q	2001 2Q	(+11)	Pooling in place as of 4/00
Illinois		773	2003 4Q	2002 3Q	(+5)	Pooling in place as of 10/99
Illinois	R	815	2002 4Q	2002 2Q	(+2)	
Indiana	R	219	2003 2Q	2003 1Q	(+1)	
Indiana		317	2002 3Q	2002 3Q*	(0)	
Indiana		765	2004 3Q	2004 2Q	(+1)	
Indiana		812	2004 4Q	2005 1Q	(-1)	
Iowa		319	2010 1Q	2001 4Q	(+33)	NPA Relief implemented
Iowa		515	2015 1Q	2008 1Q*	(+28)	Forecast reflects impact of pooling planned for 8/01
Iowa		563	2016 1Q		(NA)	New NPA
Iowa		641	2019 2Q	2008 4Q*	(+42)	Decrease in code demand
Iowa		712	2015 2Q	2010 2Q	(+20)	Decrease in code demand
Kansas		316	2012 3Q	2001 4Q*	(+43)	NPA Relief implemented
Kansas		620	2010 3Q		(NA)	New NPA
Kansas		785	2006 4Q	2006 2Q	(+2)	
Kansas		913	2009 2Q	2008 3Q	(+3)	

R = Relief date based upon rationing amount

NA = Not Applicable

* = Indicates a new forecast has been published since the May 2000 forecast

** = Code data used for study as of 3/1/01; Canadian data as of 1/1/01

*** = The quarterly change column shows a positive number if the exhaust date moved out from the previous forecast and a negative number if the exhaust date moved in

NPA exhaust projections contained herein may change based on demand for numbering resources and will be modified or revised by the NANPA as new data becomes available and are analyzed.

2001 NRUF and NPA Exhaust Analysis** June 1, 2001 Update

Locality	NPA	Apr 01	Prev Fcst	Quarter***	Notes
Kentucky	270	2003 2Q	2004 2Q	(-4)	
Kentucky	502	2005 1Q	2005 4Q*	(-3)	
Kentucky	606	2009 1Q	2003 4Q	(+21)	NPA Relief Implemented
Kentucky	859	2005 1Q	2005 4Q	(-3)	
Louisiana	225	2013 2Q	2009 4Q	(+14)	Decrease in code demand
Louisiana	318	2004 3Q	2004 4Q	(-1)	
Louisiana	337	2007 4Q	2006 1Q	(+7)	
Louisiana	504	2005 4Q	2002 1Q	(+15)	NPA Relief implemented
Louisiana	985	2008 4Q		(NA)	New NPA
Maine	207	2005 3Q	2002 3Q	(+12)	Pooling in place as of 6/00
Maryland	240/301	2003 3Q	2002 2Q	(+5)	NPA 301 is capped. Codes will be assigned if they become available; Forecast reflects impact of pooling planned for 8/01
Maryland	410/443	2002 3Q	2001 4Q*	(+3)	NPA 410 is capped. Codes will be assigned if they become available; Forecast reflects impact of pooling planned for 9/01
Massachusetts	339/781	2008 2Q	2001 3Q	(+27)	Impact of 339 Relief Overlay; Forecast reflects impact of pooling implemented on 5/01
Massachusetts	351/978	2007 3Q	2001 4Q	(+23)	Impact of 351 Relief Overlay; Forecast reflects impact of pooling planned for 2/02
Massachusetts	413	2004 1Q	2002 4Q*	(+5)	Forecast reflects impact of pooling planned for 8/01
Massachusetts	508/774	2007 1Q	2000 2Q	(+27)	Impact of Overlay 774; Forecast reflects impact of pooling implemented on 5/01
Massachusetts	617/857	2006 3Q		(NA)	Forecast reflects impact of pooling implemented on 5/01; NPA 617 was exhausted at previous forecast publication
Michigan	231	2008 2Q	2005 3Q	(+11)	
Michigan	R 248	2002 1Q	2001 2Q	(+3)	947 Overlay suspended
Michigan	313	2002 2Q	2002 1Q	(+1)	679 Overlay relief suspended
Michigan	517	2007 4Q	2001 3Q	(+25)	NPA Relief Implemented
Michigan	R 616	2002 1Q	2001 4Q	(+1)	
Michigan	734	2002 2Q	2002 1Q*	(+1)	
Michigan	R 810	2001 4Q	2001 2Q	(+2)	Relief planning suspended
Michigan	906	2008 2Q	2013 4Q	(-22)	3X increase in code demand
Michigan	989	2007 4Q		(NA)	New NPA
Minnesota	218	2009 4Q	2009 2Q	(+2)	
Minnesota	320	2024 3Q	2023 4Q	(+3)	
Minnesota	507	2004 3Q	2004 2Q*	(+1)	
Minnesota	612	2008 4Q	2004 4Q	(+16)	NPA Relief Implemented
Minnesota	651	2012 1Q	2008 4Q	(+13)	Decrease in code demand
Minnesota	763	2015 4Q	2005 1Q	(+43)	NPA Relief Implemented
Minnesota	952	2013 1Q	2006 2Q	(+27)	NPA Relief Implemented
Mississippi	228	2015 4Q	2015 4Q	(0)	

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2001 NRUF and NPA Exhaust Analysis** June 1, 2001 Update

Locality		NPA	Apr 01	Prev Fcst	Quarter***	Notes
Mississippi	R	601	2003 3Q	2003 1Q	(+2)	
Mississippi		662	2004 2Q	2004 2Q*	(0)	
Missouri	R	314	2002 2Q	2001 2Q	(+4)	557 Overlay planned for 10/01
Missouri		417	2008 3Q	2005 1Q	(+14)	
Missouri		573	2008 1Q	2005 4Q	(+9)	
Missouri		636	2008 1Q	2008 1Q	(0)	
Missouri		660	2021 4Q	2020 1Q	(+7)	
Missouri		816	2004 1Q	2002 1Q	(+8)	
Montana		406	2005 4Q	2004 1Q	(+7)	
Nebraska		308	2033 4Q	2032 1Q	(+7)	
Nebraska		402	2003 3Q	2001 2Q	(+9)	Forecast reflects impact of pooling implemented on 5/01
Nevada		702	2006 2Q	2006 2Q	(0)	
Nevada		775	2006 4Q	2006 4Q	(0)	
New Hampshire		603	2004 1Q	2001 4Q	(+9)	Forecast reflects impact of pooling implemented on 5/00
New Jersey	R	201	2001 4Q	2002 1Q	(-1)	
New Jersey		609	2002 4Q	2001 4Q	(+4)	
New Jersey		732	2000 4Q	2000 4Q	(NA)	NPA exhausted
New Jersey		856	2004 1Q	2002 3Q	(+6)	
New Jersey		908	2002 4Q	2002 4Q	(0)	
New Jersey	R	973	2001 1Q	2001 1Q	(0)	NPA exhausted
New Mexico	R	505	2003 3Q	2002 4Q	(+3)	
New York		212/646	2006 1Q	2003 2Q	(+11)	212 is capped. Codes will be assigned if they become available; Forecast reflects impact of pooling implemented on 4/01
New York		315	2004 1Q	2002 1Q	(+8)	Forecast reflects impact of pooling implemented on 2/01
New York		347/718	2006 1Q	2003 2Q	(+11)	Forecast reflects impact of pooling implemented on 4/01
New York		516	2003 2Q	2001 3Q	(+7)	Pooling in place as of 7/00
New York		518	2005 2Q	2003 1Q	(+9)	Pooling in place as of 9/00
New York		607	2012 2Q	2005 1Q	(+29)	Forecast reflects impact of pooling planned for 6/01
New York		631	2003 3Q	2002 3Q*	(+4)	Pooling in place as of 6/00
New York	R	716	2002 4Q	2002 2Q	(+2)	Pooling in place as of 4/00
New York		845	2008 3Q	2009 2Q	(-3)	Forecast reflects impact of pooling implemented on 4/01
New York		914	2005 3Q	2001 3Q	(+16)	Forecast reflects impact of pooling implemented on 4/01
New York		917	2001 1Q	2001 2Q	(-1)	NPA 917 is capped. Codes are assigned if they become available; Forecast reflects impact of pooling planned for 8/01
North Carolina		252	2007 3Q	2005 1Q	(+10)	
North Carolina		336	2003 1Q	2002 4Q	(+1)	
North Carolina		704/980	2008 1Q	2008 2Q	(-1)	
North Carolina		828	2006 4Q	2006 1Q*	(+3)	

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2001 NRUF and NPA Exhaust Analysis** June 1, 2001 Update

Locality	NPA	Apr 01	Prev Fcst	Quarter***	Notes
North Carolina	910	2006 3Q	2005 1Q	(+6)	
North Carolina	919	2002 2Q	2001 4Q	(+2)	
North Dakota	701	2007 3Q	2007 2Q*	(+1)	
Ohio	216	2005 3Q	2004 2Q	(+5)	
Ohio	330/234	2012 3Q	2009 3Q	(+12)	
Ohio	419	2002 3Q	2002 1Q	(+2)	Overlay 567 planned for 12/01
Ohio	440	2004 2Q	2004 2Q	(0)	
Ohio	513	2003 2Q	2003 1Q*	(+1)	
Ohio	614	2002 4Q	2002 3Q	(+1)	
Ohio	740	2006 4Q	2006 4Q	(0)	
Ohio	937	2004 2Q	2003 4Q	(+2)	
Oklahoma	405	2002 4Q	2002 3Q	(+1)	
Oklahoma	580	2007 2Q	2006 4Q	(+2)	
Oklahoma	918	2003 1Q	2002 3Q	(+2)	
Oregon	503A	2011 3Q	2004 3Q*	(+28)	Coastal Counties only; NPA Relief Implemented
Oregon	503/971	2008 2Q	2006 3Q	(+7)	Forecast reflects impact of pooling planned for 9/01
Oregon	541	2003 3Q	2002 4Q	(+3)	Forecast reflects impact of pooling planned for 6/01
Pennsylvania	215/267	2003 1Q	2001 4Q	(+5)	445 Overlay relief planned
Pennsylvania	R 412	2002 4Q	2002 3Q	(+1)	Overlay 878 planned for 7/01
Pennsylvania	R 484/610	2002 4Q	2001 4Q	(+4)	Forecast reflects impact of pooling implemented on 4/01
Pennsylvania	570	2003 4Q	2003 2Q*	(+2)	
Pennsylvania	717	2003 2Q	2003 4Q	(-2)	
Pennsylvania	724	2002 1Q	2001 4Q	(+1)	
Pennsylvania	814	2005 1Q	2004 3Q*	(+2)	
Puerto Rico	787	2002 2Q	2001 3Q	(+3)	
Rhode Island	401	2003 1Q	2002 3Q	(+2)	
South Carolina	803	2004 2Q	2003 2Q	(+4)	
South Carolina	843	2004 1Q	2003 2Q	(+3)	
South Carolina	864	2005 3Q	2005 3Q	(0)	
South Dakota	605	2007 3Q	2006 3Q*	(+4)	
Tennessee	423	2004 4Q	2004 2Q	(+2)	
Tennessee	615	2003 3Q	2002 2Q	(+5)	Forecast reflects impact of pooling implemented on 3/01
Tennessee	731	2012 4Q		(0)	New NPA
Tennessee	865	2014 2Q	2006 2Q	(+32)	NPA Relief Implemented
Tennessee	901	2006 3Q	2001 4Q	(+19)	NPA Relief Implemented
Tennessee	931	2009 2Q	2009 2Q	(0)	
Texas	210	2005 4Q	2005 2Q	(+2)	
Texas	214/469/972	2004 2Q	2002 1Q	(+9)	
Texas	254	2014 1Q	2017 2Q	(-13)	
Texas	281/713/832	2002 4Q	2002 3Q	(+1)	
Texas	361	2008 4Q	2006 4Q	(+8)	
Texas	409	2010 1Q	2005 3Q	(+18)	NPA Relief implemented

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2001 NRUF and NPA Exhaust Analysis**
June 1, 2001 Update

Locality		NPA	Apr 01	Prev Fcst	Quarter***	Notes
Texas	R	512	2003 4Q	2003 4Q	(0)	Pooling in place as of 8/00
Texas		682/817	2008 3Q	2000 3Q	(+32)	Impact of 682 Relief Overlay
Texas		806	2012 2Q	2013 1Q	(-3)	
Texas		830	2012 1Q	2007 1Q	(+20)	Decrease in code demand
Texas		903	2003 1Q	2002 4Q	(+1)	
Texas		915	2004 1Q	2004 2Q*	(-1)	
Texas		936	2013 4Q	2005 4Q	(+32)	NPA relief implemented
Texas		940	2015 1Q	2007 3Q	(+30)	Decrease in code demand
Texas		956	2011 3Q	2007 1Q	(+18)	Decrease in code demand
Texas		979	2010 3Q	2005 4Q	(+19)	NPA Relief implemented
US Virgin Islands		340	2148 4Q	2148 4Q	(0)	
Utah		435	2013 2Q	2012 4Q	(+2)	
Utah	R	801	2002 1Q	2001 1Q	(+4)	Forecast reflects impact of pooling implemented on 3/01
Vermont		802	2005 4Q	2007 1Q	(-5)	
Virginia	R	540	2002 3Q	2002 3Q	(0)	
Virginia		571/703	2007 2Q	2006 1Q	(+5)	
Virginia		757	2003 1Q	2002 2Q	(+3)	
Virginia	R	804	2002 2Q	2002 2Q	(0)	Forecast reflects impact of pooling planned for 6/01
Washington		206/564A	2006 1Q	2003 1Q	(+12)	564 Overlay planned for 10/01
Washington		253/564B	2006 4Q	2004 1Q	(+11)	564B Overlay planned for 10/01
Washington		360/564	2006 1Q	2010 2Q	(-17)	Reflects decision to have the 564 overlay multiple NPAs
Washington		425/564C	2006 1Q	2002 2Q	(+15)	Overlay 564 planned for 10/01
Washington		509	2004 1Q	2003 2Q*	(+3)	Forecast reflects impact of pooling planned for 7/01
Washington D.C.		202	2006 1Q	2004 3Q	(+6)	
West Virginia	R	304	2003 2Q	2002 1Q	(+5)	
Wisconsin		262	2004 3Q	2003 3Q*	(+4)	
Wisconsin		414	2010 1Q	2006 2Q	(+15)	NPA Relief Implemented
Wisconsin		608	2006 3Q	2005 4Q	(+3)	
Wisconsin		715	2005 2Q	2004 3Q	(+3)	
Wisconsin		920	2003 3Q	2003 4Q*	(-1)	
Wyoming		307	2017 1Q	2012 3Q	(+18)	Decrease in code demand

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