



June 30, 2021

Ms. Whitney Payne, Esq.
Senior Counsel
Missouri Public Service Commission
200 Madison St.,
P.O. Box 360
Jefferson City, MO 65102-0360

RE: *Notification by the North American Numbering Plan Administrator (NANPA) of Need for Relief Plan Implementation for the 314 and 816 Numbering Plan Area (NPA) Codes*

Dear Ms. Payne:

The North American Numbering Plan Administrator (“NANPA”), as the neutral third-party Numbering Plan Area (NPA) relief planner for Missouri and on behalf of the Missouri telecommunications industry (“Industry”),¹ hereby notifies the Missouri Public Service Commission (“Commission”)² the need for relief in the 314 and 816 NPAs is imminent. In accordance with Paragraph 4 of the Order issued September 25, 2001,

“the Commission’s Staff and the technical implementation subcommittees for the 314 and 816 NPAs shall monitor code usage and assignment rates and promptly move the Commission to order implementation of the overlay relief plans when exhaust is imminent or will occur within six months. Any party in this case may likewise move for the Commission’s action.”³

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 314 and 816 area codes.

² The Federal Communications Commission (“FCC”) delegated authority to the states to review and approve NPA relief plans. *See* 47 C.F.R. §52.19.

³ Order Delaying Implementation of the 314 NPA and 816 NPA Overlay Relief Plans and Dismissing a Party, Proceeding No.TO-2000-374, para. 4 (Sept. 25, 2001) (“September 2001 Order”).

Consistent with the Commission's Order and to update the record, NANPA hereby notifies you that the 314 area code is currently projected to exhaust, absent relief, during the second quarter of 2023, and the 816 area code is currently projected to exhaust, absent relief, during the third quarter of 2024.

Background: The 314 NPA, which covers the area of St. Louis and suburbs in neighboring St. Louis County and the 816 NPA, which covers Kansas City, St. Joseph, and all or part of 15 surrounding counties in northwestern Missouri, were the original NPAs which together served the entire state of Missouri when implemented in 1947.

On October 24, 2000, the Commission issued an Order directing the implementation of an all-services overlay for the relief of each of the 314 and 816 NPAs⁴ and issued subsequent orders approving the implementation plans of all-services overlays on January 5, 2001, for the relief of the 314 NPA⁵ and on February 15, 2001, for the relief of the 816 NPA.⁶ On September 25, 2001, due to the Commission's implementation of number conservation measures, the Commission issued an order delaying indefinitely the overlay implementation plans for the 314 and 816 NPAs⁷.

⁴ *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Report and Order, Proceeding No.TO-2000-374 (Oct. 24, 2000).

⁵ *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Order Approving the 816 NPA Relief Implementation Plan and Directing Filing, Proceeding No.TO-2000-374 (Jan. 5, 2001).

⁶ *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Order Approving the 816 NPA Relief Implementation Plan and Directing Filing, Proceeding No.TO-2000-374 (Feb. 15, 2001).

⁷ September 2001 Order.

As required by the FCC, NANPA collects area code data, develops projected demand for numbering resources and publishes the projected exhaust of each area code twice a year. In April 2021, NANPA published its semi-annual NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“April 2021 NRUF Report”) which indicated that the 314 NPA complex will exhaust during the second quarter of 2023 and the 816 NPA is projected to exhaust in the third quarter 2024. NANPA convened an Industry meeting via web conference on June 8, 2021 to develop implementation plans included in this letter for both NPAs.⁸

The 314 and 816 NPAs are scheduled to transition to mandatory 10-digit local dialing by July 15, 2022 as a result of the FCC’s Order approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline.⁹ As a result of this transition, 10-digit local dialing already will be in place prior to the implementation of the new area codes.¹⁰ In addition, the NPA Relief Planning Guidelines were amended to accommodate the impact the national implementation of the 988 abbreviated dialing code and the associated 10-digit dialing transitions will have on area code relief by stating that the only option for relief of these

⁸ NANPA is responsible for initiating area code relief in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically 36 months prior to exhaust.

⁹ Implementation of the National Suicide Hotline Improvement Act of 2018, Report and Order, FCC 20-100 (rel. July 17, 2020).

¹⁰ Under the industry 10-digit dialing transition plan for 988 implementation, customers will be educated to expect that mandatory 10-digit dialing will begin on October 24, 2021. Service providers will then have between October 24, 2021 and July 15, 2022 to remove 7-digit dialing in the 314 and 816 NPAs from their networks. See the 988 milestones posted on the NANPA website at [https://www.nationalnanpa.com/transition to 10 digit dialing for 988/index.html](https://www.nationalnanpa.com/transition%20to%2010%20digit%20dialing%20for%20988/index.html)

NPAs is an overlay. Due to this change to the Guidelines, the only option for relief of the 314 and 816 NPA is the already-approved overlays.¹¹

Description of the Overlay Implementation Plan: The all-services overlay would superimpose new NPAs over the same geographic area covered by each of the existing 314 and 816 NPAs. NANPA will assign CO codes from the new overlay area code once all assignable CO codes from the 314 and 816 NPAs are exhausted before assignments are made in each of the new overlay area codes. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. The current dialing plan will remain unchanged. The dialing plan is set forth in the following table:

Dialing Plan for the 314 and 816 All-Services Overlays

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA) (including Extended Area Service (EAS) calls)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 permissive dialing at service provider discretion

While the January 5, 2001, and February 15, 2001 Orders contain implementation instructions to the industry, many factors have changed in the 20 years since these Orders were approved. Since education for and implementation of 10-digit

¹¹ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 9, 2021) at §5.63 (“NPA Relief Planning Guidelines”). In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Relief Planning Guidelines. The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://access.atis.org/apps/group_public/documents.php?view=.

local dialing will be complete, the only remaining element for consideration is the implementation of the new NPAs.

The new NPAs that were assigned for both areas after the overlay approval orders are still reserved. The new NPA assigned for 314 the overlay is 557, and the new NPA assigned for the 816 overlay is 975.¹²

In preparation for submitting this letter to you, NANPA facilitated a meeting of the Industry on June 8, 2021, during which the Industry, by consensus decision, decided to implement relief for each area code in accordance with a 9-month schedule. The schedule does not include specific dates but rather timeframes to identify the phases of implementation. Adhering to this Industry agreed-upon schedule will allow the new NPAs to be implemented at least six months prior to the projected exhaust of the 314 and 816 NPAs.¹³ The Industry will select specific dates at a subsequent implementation meeting to ensure they do not interfere with certain holidays, high traffic days, network freeze periods, or conflict with other overlay implementations occurring across the country. NANPA will facilitate this Industry meeting approximately 60 days from the date of this letter, unless directed otherwise by the Commission.

The following are activities considered by the Industry for an Implementation Schedule for each of the All-Services Overlays:

¹² See NANPA Planning Letter 279 published on the NANPA website at <https://www.nationalnanpa.com/pdf/pl-nanp-279.pdf> and Planning Letter 280 published on the NANPA website at <https://www.nationalnanpa.com/pdf/pl-nanp-280.pdf>.

¹³ The NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Apr. 09, 2021) (“NPA Relief Planning Guidelines”) note that relief should be implemented six months prior to exhaust. NPA Relief Planning Guidelines at §7.2. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://www.atis.org/01_committ_forums/inc/documents/.

EVENT	TIMEFRAME FOR 314/557 OVERLAY	TIMEFRAME FOR 816/975 OVERLAY
Customer Education and Network Preparation Period*	9 months	9 months
Earliest Activation of CO codes in the new NPA **	At completion of Customer Education and Network Preparation Period and after all 314 CO codes are exhausted <i>No later than 4Q2022</i>	At completion of Customer Education and Network Preparation Period and after all 816 CO codes are exhausted <i>No later than 1Q2024</i>

* There is no requirement for a permissive dialing period because mandatory 10-digit dialing is already be in place.

** CO codes in the new 557 NPA will not be assigned until all available codes in the 314 NPA have been exhausted; CO codes in the new 975 NPA will not be assigned until all available codes in the 816 NPA have been exhausted.

Adhering to an Industry-proposed implementation schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

The original Orders directed the industry to form a planning committee to implement the new area codes. The following table outlines the methods and processes the industry typically utilizes in current relief projects for implementation of an initial overlay when mandatory 10-digit dialing is already in place; however, these could be modified during the actual implementation:

Customer Education Milestones:

Task #	Customer Education Tasks	Responsibility
1	Single customer notification of new NPA through methods such as bill messages, bill inserts, direct mail, text messaging, email	All Service Providers
2	Issue initial press release	MO PSC; Service Providers to the extent they are able to do so

3	Send Special letters to PSAPs and Directory Publishers	Co-chairs of industry committee
4	Update social media with information regarding overlay	All Service Providers (optional)
5	Update websites with information regarding overlay	All Service Providers
6	Develop language for use in Directories to alert consumers of the new NPA	Service Providers that publish directories
7	Issue second press release just prior to effective date of new NPA	MO PSC; Service Providers to the extent they are able to do so

Technical Milestones:

Task #	Technical Tasks	Responsibility
1	Obtain industry test code from NANPA and activate the test number	One Service Provider volunteer
2	Open the test code in service providers' networks	All Service Providers
3	Establish NPA-specific types of trunks (as needed)	All Service Providers (as needed)
	E911 Work Plan Tasks	
4	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
5	Ensure Selective Router Database (SRDB) table has new NPA built	E911 Providers
6	Notify Public Safety Answering Points (PSAPs), Public Safety Automation Location Identification (PSALI) customer and PSAP County Coordinators of new NPA	E911 Providers
7	Review and Submit CLEC trunk order requests to local provider (as needed)	All Service Providers (as needed)
8	Update PSAP equipment to recognize the new NPA	PSAPs
9	Trunk Orders Complete	E911 Providers
10	Build E911 Network/Tandem Translations	E911 Providers
11	Verify all PSAP work has been completed	PSAPs
12	Activate E911 Network/Tandem Translations	E911 Providers

Conclusion: The Industry will take steps to implement the all-services overlay area codes over the 314 and 816 NPAs as previously approved by the Commission and in line with the customer education and technical implementation plan and the schedule set forth above. The Industry will move forward with implementation as outlined herein within 60 calendar days from the submission of this letter unless the Commission directs us otherwise.

Thank you for your attention to this matter. If you should have any questions, please do not hesitate to contact me directly at 571-363-3824 / hwayman@nanpa.com.

Respectfully submitted,

Heidi Wayman

Heidi Wayman,
Manager, Data Management,
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171

Attachment