

Mimi B. MacDonald
Attorney

Southwestern Bell Telephone
One Bell Center, Room 3546
St. Louis, Missouri 63101
Phone 314 235-2518
Fax 314 247-0881



January 10, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED²

JAN 10 2000

Missouri Public
Service Commission

Re: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Response to the Office of the Public Counsel's Motion for Notification of the Filing of the Petition to the Public, Governmental Officials, and Other Interested Parties and for a Reasonable Opportunity for Intervention, for Evidentiary Hearings, for Public Hearings, for the Establishment of a Technical Committee and for an Extension of Time to File its Response and Recommendations to the Petition.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Mimi B. MacDonald /TM

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JAN 10 2000

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

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
RESPONSE TO THE OFFICE OF THE PUBLIC COUNSEL'S MOTION
FOR NOTIFICATION OF THE FILING OF THE PETITION TO THE PUBLIC,
GOVERNMENTAL OFFICIALS, AND OTHER INTERESTED PARTIES AND FOR
A REASONABLE OPPORTUNITY FOR INTERVENTION, FOR EVIDENTIARY
HEARINGS, FOR PUBLIC HEARINGS, FOR THE ESTABLISHMENT OF A
TECHNICAL COMMITTEE AND FOR AN EXTENSION OF TIME TO FILE ITS
RESPONSE AND RECOMMENDATIONS TO THE PETITION**

COMES NOW Southwestern Bell Telephone Company ("SWBT") and, for its Response to the Office of the Public Counsel's ("OPC") Motion for Notification of the Filing of the Petition to the Public, Governmental Officials, and Other Interested Parties and for a Reasonable Opportunity for Intervention, for Evidentiary Hearings, for Public Hearings, for the Establishment of a Technical Committee and for an Extension of Time to File its Response and Recommendations to the Petition, states as follows:

1. On December 29, 1999, the OPC filed its Motion for Notification of the Filing of the Petition to the Public, Governmental Officials, and Other Interested Parties and for an Reasonable Opportunity for Intervention, for Evidentiary Hearings, for Public Hearings, for the Establishment of a Technical Committee and for an Extension of Time to File Its Response and Recommendations to the Petition.

2. The OPC either does not understand or has blatantly misrepresented the established Industry-developed NPA Relief Planning Process. This Commission has, pursuant to a prior FCC decision, accepted this process which specifically contemplated the development of an industry proposal which is then submitted to this Commission for approval. The process was

conducted in full compliance with applicable guidelines, resulting in the development of a numbering Relief Plan for presentation to this Commission. At this stage, the Commission has the option to conduct such proceedings as it deems appropriate, involving solicitation of input from the public, before selecting a Relief Plan. Now is the appropriate time to solicit such input, and SWBT supports the Commission's decision to conduct additional proceedings.

3. In In the Matter of the Administration of the North American Numbering Plan, CC92-237 (released July 13, 1995), the Federal Communications Commission ("FCC") determined that the functions of the North American Numbering Plan Administration would be conducted by a neutral third party. As part of the orders, the FCC gave all local jurisdictions (be it a state, province, or country) two options. Each local jurisdiction could either: (a) assume responsibility for developing its own initial NPA Code Relief Plans; or (b) allow the North American Numbering Plan Administrator to develop initial NPA Code Relief Plans. In either scenario, the ultimate authority to approve or reject a Relief Plan remained with the local jurisdiction's regulatory commission.

4. Each local jurisdiction (including Missouri), with the exception of Ohio and Canada, opted to allow the North American Numbering Plan Administrator to develop NPA Code Relief Plans.

5. The current North American Numbering Plan Administrator is NeuStar ("NANPA"). One of the functions of NANPA is NPA Relief Coordinator.

6. The Telecommunications Industry and NANPA developed the NPA Code Relief Planning and Notification Guidelines, a copy of which is attached hereto and is marked as Exhibit A. Section 5 governs the NPA Relief Planning Process.

7. Pursuant to Section 5, NPA Relief Coordinators take the lead to prepare relief options, including a Relief Plan, for each NPA projected to exhaust within the next five to ten years. (See Section 5.0).

8. In order to prepare relief options, including a Relief Plan, each NPA Relief Coordinator is required to project when the NPA is expected to exhaust. (See Section 5.1). Next, the NPA Relief Coordinator identifies possible NPA relief alternatives and methods as outlined in Section 6 of the NPA Code Relief Planning and Notification Guidelines. (See Section 5.2).

9. For each of the alternative relief methods identified, the NPA Relief Coordinator is expected to list and quantify the impacts in order to determine the advantages and disadvantages of the alternatives. (See Section 5.3).

10. The NPA Relief Coordinator then incorporates the results from these efforts into an initial Planning Document for distribution to the Industry in the affected NPA. (See Section 5.4). The Relief Coordinator is expected to attach a letter notifying Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching Consensus on the method to be adopted. (See Section 5.4).

11. Next, the NPA Relief Coordinator conducts Industry meetings and/or conference calls with all interested members of the Industry within the affected NPA. (See Section 5.5). The NPA Relief Coordinator then submits the Industry Consensus to the appropriate regulatory body. (See Section 5.6).

12. In the case at hand, NANPA notified Industry members via U.S. mail, facsimile and/or electronic mail, of a Relief Planning meeting that was scheduled for November 9, 1999.

Specifically, NANPA notified all Code Holders¹, those that it expected to become Code Holders and, therefore, may be affected by the proposed NPA Code Relief, and other parties who expressed an interest, as well as the Office of the Public Counsel ("OPC").

13. Certain Code Holders, including SWBT, attended the November 9, 1999 meeting. Although the OPC was notified of the November 9, 1999 meeting, it did not attend this meeting.

14. Additionally, NANPA notified all Code Holders, those it expected to become Code Holders, and other parties who expressed an interest, as well as the OPC, that it was going to hold a telephone conference on December 1, 1999, in order to approve the minutes of the November 9, 1999 meeting, refine the motion NANPA was going to file with the Commission, and obtain additional input. Although OPC was specifically invited to participate in this telephone conference, it elected not to do so.

15. OPC now requests the Commission to issue a notice to the public and to state and local governmental officials in the St. Louis and Kansas City metropolitan areas and to other interested parties that may be affected by NANPA's proposed area code relief plans in the 314 and 816 NPAs. OPC reasons that the Petition was filed without providing adequate notice to the hundreds of IXCs, the dozens of CLECs, the alarm companies, wireless carriers, paging companies, state and local governmental officials of districts and communities that lie within the 314 and 816 area codes to provide these interested parties with an adequate opportunity to intervene, if desired, or with an opportunity to comment or become informed of the proposed plans.

16. While SWBT supports the issuance of a notice to the public and to the state and local governmental officials in the St. Louis and Kansas City metropolitan areas that may be

¹ The entity to whom a CO code (NNX/NXX) has been assigned for use at a Switching Entity or Point of Interconnection it owns or controls.

affected by NANPA's proposed area code Relief Plans in the 314 and 816 NPAs, SWBT objects to OPC's blatant mischaracterization of the NPA Relief Planning process.

17. First, all Code Holders (including CLECs, wireless carriers, and paging companies), those entities which NANPA expected to become Code Holders, other parties who expressed an interest, and the OPC were notified of the November 9, 1999 meeting, which was held in accordance with the Industry-developed NPA Code Relief Planning and Notification Guidelines. The NPA Code Relief Planning Process, as described above, neither envisioned nor required NANPA to invite alarm companies, state and local governmental officials of districts and communities that lie within the 314 and 816 area codes to the November 9, 1999 meeting because the purpose of the NPA Relief Planning Process is to present an Industry Consensus to the appropriate regulatory body. The regulatory authority then has the option of conducting such proceedings as it considers appropriate.

18. Second, OPC alleges that the Relief Plan was developed and approved by a very small segment of the telecommunications industry. Again, all Code Holders, those entities that the NANPA expected to become Code Holders, other interested parties, as well as the OPC were invited to the November 9, 1999 meeting. SWBT, therefore, objects to OPC's blatant attempt to cast those members of the Industry that elected to participate in an unfavorable light. OPC's allegation is particularly disingenuous in light of the fact that OPC is charged with representing the public and it elected not to attend the November 9, 1999 meeting or participate in the December 1, 1999 conference call.

19. Third, SWBT objects to OPC's characterization of NANPA's Petition as: "a major step backwards from the process this Commission adopted in 1995 for the review of NXX exhaustion in Missouri and to develop Relief Plans that have broad based participation and the

opportunity for public input.” As discussed above, the FCC allowed the Commission to determine whether it wanted to develop its own initial NPA Relief Plans or have NANPA develop such plans. No matter which of these alternatives the Commission selected, it maintained the ultimate authority to accept or reject a proposed Relief Plan and to conduct such proceedings as it deemed appropriate. The Commission decided to allow NANPA to develop the initial NPA Relief Plans. NANPA and the Industry developed the NPA Relief Planning Process which requires the NPA Relief Coordinator to conduct industry meeting(s) with the goal of reaching Industry Consensus on a Relief Plan. The Industry Consensus is then presented to the regulatory body.

20. SWBT supports the Industry-developed NPA Relief Planning Process as outlined in Section 5 of the NPA Code Relief Planning and Notification Guidelines. That the Industry presents its Consensus to the applicable regulatory body, here the Commission, in no way prevents the Commission from seeking public input before approving or rejecting NANPA’s proposed Relief Plans.

21. Thus, SWBT has no objection to the Commission scheduling evidentiary hearings and/or public hearings regarding NANPA’s proposed NPA Code Relief Plan as the Commission has the ultimate authority to approve all Relief Plans.

22. SWBT respectfully reminds the Commission that the 314 and 816 NPA Codes are expected to exhaust in the second quarter of 2001. Additionally, SWBT respectfully reminds the Commission that in NANPA’s Motion it requested the Commission to adopt a Relief Plan by

March 1, 2000, in an effort to implement the Relief Plan before placing the 314 and 816 NPAs in a jeopardy situation.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Mimi B. MacDonald /tm

PAUL G. LANE #27011

LEO J. BUB #34326

ANTHONY K. CONROY #35199

MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone Company

One Bell Center, Room 3510

St. Louis, Missouri 63101

314-235-4094 (Telephone)

314-247-0014 (Facsimile)



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1200 G Street NW
Suite 500
Washington DC 20005
www.atis.org

NPA CODE RELIEF PLANNING & NOTIFICATION GUIDELINES

These guidelines are reissued in connection with the resolution of
INC Issues 144 and 205.

EXHIBIT A

TABLE OF CONTENTS

- 1.0 PURPOSE
- 2.0 ASSUMPTIONS AND CONSTRAINTS
- 3.0 NPA RELIEF PLANNING PRINCIPLES
- 4.0 CO CODE ADMINISTRATORS RESPONSIBILITIES FOR CODE RELIEF PLANNING
- 5.0 NPA RELIEF PLANNING PROCESS
- 6.0 ALTERNATIVE RELIEF METHODS
- 7.0 OTHER RELIEF PLANNING CONSIDERATIONS
- 8.0 UPDATING THE RDBS, LASS AND BRIDS
- 9.0 ROUTING OF NEW NPA CODE
- 10.0 THE PERMISSIVE DIALING PERIOD
- 11.0 ANI AND RECORDS CONVERSION
- 12.0 MANDATORY DIALING
- 13.0 MAINTENANCE OF THIS DOCUMENT
- 14.0 GLOSSARY
- Appendix A - Check List for NPA Code Relief Coordinator
- Appendix B - Issues to be Considered during NPA Relief Planning
- Appendix C - Industry Notification of NPA Relief Activity Time Line

1.0 Purpose - The purpose of this document is to provide guidelines for NPA code relief planning activities. This includes the relief planning process, industry notification process and the CO Code Administrators' responsibilities to the NPA Relief Coordinators, affected parties and applicable regulatory authorities within the North American Numbering Plan area. It also provides relief planning principles, administrative responsibilities and industry notification requirements. The steps of the NPA code relief planning process are listed and the alternative methods of providing relief and their various attributes are described.

2.0 Assumptions and Constraints - The development of these guidelines include the following assumptions and constraints:

2.1 These guidelines were intended to apply to geographic NPA relief planning only.

2.2 These guidelines were developed to facilitate and help standardize the geographic NPA relief planning process.

2.3 Relief activities will be undertaken to provide relief to an exhausting NPA. For the purpose of NPA relief planning, it is assumed that the capacity of an NPA is 792 CO codes (NXXs). However, in overlay NPA situations, the CO code exhaust capacity will be the number of NPA codes assigned to that geographic area times 792.

2.4 The relief plan chosen will seek to minimize end users' confusion while balancing the cost of implementation by all affected parties.

2.5 For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of eight to ten years.

2.6 All efforts should be made to choose a plan that does not favor a particular interest group, i.e., no carrier should receive a distinct competitive advantage over other carriers as a result of reaching a consensus on a particular plan.

2.7 It is assumed that NANPA will provide the moderator for all relief planning meetings and the moderator will run meetings in a fair and impartial manner ensuring that all participants have the opportunity to express their opinions³.

2.8 These relief planning guidelines were developed without making any assumption as to who will fill the role of CO Code Administrator or NANP Administrator.

³ The identity of the moderator does not apply in Canada nor certain local jurisdictions which assume this role, e.g. Ohio.

2.9 CO codes and NPA codes are public resources and administrative assignment of these codes does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which the resource is assigned.

2.10 The appropriate regulatory commission (e.g., state, province, country) has the ultimate authority to approve or reject a relief plan.

2.11 In the United States, geographic NPA code boundaries do not currently extend across state lines. Geographic NPA boundaries must follow rate center boundaries.

2.12 Once there is a consensus/approved relief plan, all code holders and the PA, where thousand block number pooling has been implemented, in the exhausting NPA will take the appropriate steps to facilitate the implementation of the plan.

2.13 These guidelines and all related documents/guidelines* referenced herein will be made available to all affected parties by the Relief Coordinator upon request.

3.0 NPA Relief Planning Principles - The following principles should be followed during NPA Code Relief Planning:

3.1 The NPA Code Relief Coordinator should facilitate the selection of a consensus NPA code relief alternative based upon input as outlined in Section 5 below.

3.2 Communications should be established with all affected industry members, appropriate regulatory bodies and the North American Numbering Plan Administration (NANPA). This should be initiated immediately after the need for NPA Code relief has been determined.

4. CO Code Administrator's and Pool Administrator's Responsibilities for Code Relief Planning - This section identifies required code relief planning functions that are related to the CO code (NXX) and thousand block pooling assignment functions as specified in these guidelines. These functions are identified because they are currently performed in conjunction with code assignment. An objective of this function is to promote effective and efficient code utilization and thereby help ensure the adequate supply of CO codes (NXXs).

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

The Code Administrator(s) and the Pool Administrator where thousand block number pooling has been implemented shall be required to provide assistance in the code relief planning process when and if necessary. The output of the planning process shall be made available to code holders, applicants and the industry by whatever means is appropriate.

Relief planning functions included in this section are as follows:

4.1 Tracks CO code (NXX) assignments within NPAs to ensure effective and efficient utilization of numbering resources.

4.2 Works with the Code Administrator(s), with input from the Pool Administrator, to prepare the semi-annual CO Code Utilization Survey (COCUS) input as described in the CO Assignment Guidelines (INC 95-0407-008) and the Thousand Block (NXX-X) Pooling Administration Guidelines *[Add Document Number when assigned]* and forwards the information to NANPA. This function includes the following activities:

4.2.1 Issues requests for, collects and compiles available information related to CO code (NXX) utilization and relief planning forecasts. The Pool Administrator may issue requests for thousand block data.

4.2.2 Investigates and resolves, wherever possible, any discrepancies in the information provided.

4.2.3 Any information released to NANPA or to the industry would be released only on an aggregated or summary basis. (See Section 8.1 of the CO Assignment Guidelines)

4.3 Projects CO code (NXX) exhaust within NPAs in order to prepare for NPA relief activity, determines whether rationing will be required to avoid exhaust before relief, and declares jeopardy. If necessary, negotiates final jeopardy procedures. (See Jeopardy section in the CO Code (NXX) Assignment Guidelines.)

4.4 Develops plans for NPA relief and initiates implementation efforts in both normal and jeopardy situations (see Jeopardy section in the CO Code (NXX) Assignment Guidelines). When the need for code relief is identified and relief activity is initiated, advises all parties affected by NPA relief activities and includes them in the planning effort.

4.5 Collects, compiles and forwards the necessary information to NANPA for the purpose of obtaining an NPA assignment when it is determined that a new NPA code is required to accommodate relief.

4.6 Obtain endorsement of NPA relief plan from appropriate regulatory authority(ies), where necessary.

4.7 Develops dialing plan alternatives within local jurisdictions.

4.8 Provides assistance to users of numbering resources and suggests alternatives, when possible, that will optimize numbering resource utilization.

4.9 Prepares and issues information related to reports for special information requests and scheduled periodic reports that relate to utilization of numbering resources.

5.0 NPA Relief Planning Process - NPA relief coordinators shall take the lead to prepare relief options for each NPA projected to exhaust within the next five to ten years, in accordance with Section 3.0 above. These NPAs are identified in the Central Office Code Utilization Survey (COCUS) which is conducted annually by NANPA.

a) The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.

b) The relief options shall be a living document and reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, implementation of number pooling, etc.). The annual COCUS analysis shall be used as one of the tools in updating the options.

c) The relief plan, which will evolve from these relief options, shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

d) Interested industry parties are encouraged to become involved in the development of the plan. Local regulators shall be made aware of the plan and approve, if necessary.

e) The choice of relief methods (e.g., split, overlay, boundary realignment) is a local decision and shall be specified in the plan, along with boundaries if a split is chosen. The estimated relief period shall be included in the plan along with assumptions, projected code assignment rates, etc.

f) For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of eight to ten years.

g) The use of protected codes (NXXs), which permit seven-digit dialing across NPA boundaries, should be eliminated or reduced to an absolute minimum as part of the NPA code relief planning process. Reduction or elimination of protected codes should be accomplished prior to a request for a relief NPA code.⁴

h) In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than fifteen years, shall be avoided.

Requests for relief NPA codes shall be submitted to NANPA at least 18 months prior to the NPA relief date subject to local regulatory constraints. Normally, only one code will be assigned per request unless the codes are to be introduced simultaneously or unless implementation concerns dictate a phased-in implementation of subsequent NPA(s) within two years of the relief date of the preceding relief code. The latest version of the plan, along with relevant COCUS data, shall be submitted to NANPA with the NPA request.

5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes to NXX growth demands in the future, the Relief Coordinator should project to the best of his/her ability the expected exhaust of the NPA. The Central Office Code Utilization Survey (COCUS) should be used as an aid in this projection. Consideration may be given to unforeseen but reasonable increases and/or decreases to expected growth rates which would result in an exhaust "window" rather than a specific exhaust date. Once the earliest likely exhaust date is determined, the Coordinator should establish a mandatory dialing date six to twelve months prior to that date, giving consideration to items such as busy seasons, customer service order activity, customer equipment and number changes, and any other concerns which would increase the probability for service problems during the transition period.

5.2 Identify the Alternative Relief Methods Available - Within the affected NPA, the Relief Coordinator should next identify possible NPA relief alternatives and methods from among those identified in Section 6. This may include one or more NPA Split alternatives, at least one Overlay alternative, and, where applicable, one or more NPA

⁴ Per letter dated 10/29/97 from NANC Chairman to INC Moderator.

Boundary Realignment alternatives. Combinations of these alternatives may also be considered.

5.3 Define the Attributes of Each Alternative or Method - For each of the alternative relief methods identified in 5.2, the Coordinator should next list and quantify the impacts, using Appendix A of this document, in order to determine the advantages and disadvantages of the alternatives. Specific calculations such as the relative lengths of the relief periods, identify the impacts of dialing local calls using seven-digits or ten-digits on an industry segment basis, and the number of subscribers requiring number changes should be made at this point. Technical and operational impacts should also be identified including items such as required switch replacements and support system modifications.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the recommended Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an initial Planning Document for distribution to the Industry in the affected NPA. Attached to this Document should be a letter notifying Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The Relief Coordinators should also make available copies of this document, as well as other relevant documents* . Sufficient time should be provided prior to the meetings to allow individual industry members to fully analyze the alternatives from the perspectives of affects on their customers, economics and technological and operational impacts.

5.5 Conduct Industry Meetings with the Goal of Reaching Industry Consensus on a Relief Plan - Meetings and/or conference calls should be held with all interested members of the Industry within the affected NPA after each has had sufficient time to analyze the proposed alternative relief methods. The Relief Coordinator should provide a Moderator at these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and should be included in these discussions. Initially, separate meetings for the various industry segments may be held to increase efficiency and manageability. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be required.

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

In addition to discussing the alternatives, more detailed issues such as new NPA boundaries, local calling areas, regulatory issues, customer education, and the length of any necessary permissive dialing periods should be discussed.

All meetings and/or conference calls should be fully documented in meeting minutes which are to be made available to the participants prior to the subsequent meeting or call. Copies of meeting minutes may also be forwarded to the appropriate regulatory body as well as to the North American Numbering Plan Administrator.

5.6 Notify Appropriate Regulatory Body - When consensus is reached within the industry or when it appears that additional meetings would not achieve consensus, the NPA Relief Coordinator should submit to the appropriate regulatory body (or bodies) the results of the industry effort. If consensus was not obtained, the NPA Relief Coordinator may ask the regulatory body for assistance in reaching a solution. If regulatory assistance is required to adopt a "final plan", the NPA Relief Coordinator should prepare a "final recommendation" for circulation and then submit the "final plan" plus comments, if any, provided by industry participants to the appropriate regulatory body. Regulatory activities will vary by state. The Relief Coordinator should be prepared to furnish to the regulators any background information deemed necessary including the original studies, meeting minutes, mailing lists, etc. The NPA Relief Coordinator should prepare a "final recommendation" for circulation and comment by industry participants. The NPA Relief Coordinator should then submit the "final plan" plus comments, if any, provided by industry participants, to the appropriate regulatory body.

5.7 Notify the North American Numbering Plan Administration (NANPA) - When the final NPA Relief Plan has been determined, and at least 18 months prior to the NPA Relief date, the Relief Coordinator should formally notify NANPA of the pending NPA exhaust, request formal assignment of a new NPA, and submit sufficient background information to justify the assignment of a code. Normally this would include the exhaust and relief projects discussed in 5.1 and 5.3, a description of the relief method to be utilized and the relief schedule. In those situations where a final plan has not yet been developed prior to the 18-month requirement, the Planner should forward whatever information is available at that time, together with a statement that the final relief method has not yet been determined.

5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA
- that the telecommunications industry in the exhausting NPA will meet (time/place) to begin planning for the relief

- and that questions concerning the relief effort may be directed to the NPA Relief Coordinator (name/tel. no.)

The relief alternatives described in Section 6 may be identified as the range of possible alternatives, however, preference regarding specific relief alternatives should not be discussed.

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the Relief Coordinator, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry planning committee. Upon reaching consensus on a relief plan, a press release developed with industry input may be issued to inform the public of the industry approved plan for relief of the exhausting NPA.

If there is no industry consensus for a relief plan, the NPA Relief Coordinator may advise the public of that fact and that a final recommendation, along with written comments from industry participants have been submitted to the appropriate regulatory authority for its final disposition. Upon regulatory approval of a relief plan, the NPA Relief Coordinator will advise the public of the details of the plan. This does not preclude NANPA from issuing its standard ILs in accordance with industry guidelines for such notice (see ICCF 92-1127-006).

5.9 Public Announcement of the Relief - A minimum of 12 months advance notice of an NPA split/overlay should be provided by the NPA Relief Coordinator. This notice should include a full disclosure of the associated testing period, permissive dialing time, ANI and records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification and the date it will become available. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, new dialing procedures (if any) and a contact name and telephone number.

In addition to any other public announcements, the North American Numbering Plan Administration (NANPA) will provide 12 months advance notice to the industry via an Information Letter. In order to do so, they must receive the required information from the NPA Relief Coordinator at least one month before the 12 month notice is to be published. The NXXs associated with the NPA relief will not be published with the NANP letter, but will continue to be published in the Local Exchange Routing Guide (LERG) at least six months in advance (to be coordinated with the quarterly issue).

Prior to the 12 month notification period, NPA Relief Coordinators, with assistance from the Pool Administrator(s), when necessary, are encouraged to begin informal discussions with the impacted access purchasers and other entities to provide whatever information may be available at the time regarding an NPA split/overlay. It is recognized that planning for an NPA split involving other carriers (e.g., cellular, independents and others as appropriate) may begin earlier than this information notification.

The NPA Relief Coordinator may choose to provide a formal public notification of the planned NPA relief prior to the twelve-month notice with full disclosure. To the extent that such notification is made, the NPA Relief Coordinator should inform the NANP of the announcement. Upon receipt of the information, the NANPA will issue an Information Letter describing the proposed relief. It is recognized that this letter will typically not contain all the information to be provided with the twelve-month (full disclosure) letter, but will simply alert the industry (areas served by the NANP) of the upcoming event.

6.0 Alternative Relief Methods - All of the currently identified code relief alternatives are described below. Possible impacts of these alternatives are found in Appendix B.

6.1 NPA Split Method - By this method, the exhausting NPA is split into two geographic areas leaving the existing NPA code to serve, for example, an area with the highest customer density (in order to minimize number changes) and assigning a new NPA code to the remaining area. This method divides areas by approximate jurisdictional, natural or physical boundaries (counties, boroughs, cities, river, etc.) between the old and new NPAs. The actual boundaries must conform to existing rate center boundaries.

This method has been the alternative chosen for practically all NPA relief situations prior to 1995. NPA splits have occurred with enough frequency so that technical aspects have been addressed and established implementation procedures are generally understood when the NPA boundaries conform to rate center boundaries. Public education and acceptance of the process has been made easier because of the numerous NPA splits that have occurred. This method generally provides long term relief for an area.

6.2 Boundary Realignment Method - In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change. This method applies to multi-NPA states or provinces only. It could provide for a better balance of central office (NXX) code

utilization in the affected NPAs. Boundary realignments must follow rate center boundaries. This method is viewed as an interim measure because it tends to provide a shorter-term relief than when providing a new NPA code.

6.3 Overlay Method - An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is provided by opening up a new NPA code within the same geographic area as the NPA(s) requiring relief. Numbers from this new NPA are assigned to new growth on a carrier neutral basis, i.e., first come, first served. Mandatory customer number changes within the affected overlay relief area are eliminated. In most cases, with the overlay relief method, ten digit dialing is required for some of the affected customers' calling patterns. Since the overlay relief method could result in unequal dialing for those customers served out of the overlay NPA, mandatory ten digit dialing is recommended for all NPAs covered by the NPA coincident with the implementation of an overlay.

The overlay method reduces or eliminates the need for customer number changes like those required under the split and realignment methods. It also allows the option to eliminate the permissive dialing period as part of implementation. This method will necessitate ten digit dialing of local calls between the old and new NPAs as central office (NXX) codes are implemented in the new NPA. NPAs have been previously implemented within an area and will vary with the individual characteristics of the area involved. Four potential implementation strategies have been identified for an NPA overlay. They are listed below:

6.3.1 Distributed Overlay - The distributed overlay strategy may be considered in situations when growth in telephone numbers is expected to be more or less evenly distributed throughout the existing NPA requiring relief. The new NPA is added to the NPA requiring relief and shares exactly the same geographic boundaries. When growth telephone numbers are required, they are assigned from the new NPA.

6.3.2 Concentrated Growth Overlay - A concentrated growth overlay may be considered in situations when the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new phone numbers in that section would be assigned from the new NPA. As more relief is required, the geographic area served by multiple NPAs could expand.

6.3.3 Boundary Extension Overlay - With a boundary extension overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these

two NPAs is eliminated, and spare NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary extension might be in a state or province consisting of two NPAs, where one NPA has spare capacity. This solution has the advantage of not requiring a new NPA code, but it also shares some of the limitation of boundary realignment in that it provides less long term relief.

6.3.4 Multiple Overlay - The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief, i.e., a split or a distributed overlay. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists.

6.4 Other - A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlay as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations and community needs and requirements.

7.0 Other Relief Planning Considerations - This section describes miscellaneous considerations which should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues relevant to a successful and efficient implementation effort.

7.1 Organization Considerations - To the maximum extent possible, NPA relief planning should include considerations of organizational continuity. This includes not only the Administrator's own organization or entity, but continuity within the industry as well. The chances for successful implementation of relief efforts are greatly enhanced if there is smooth transition from the planning phase and continued involvement with the industry team as implementation progresses. Thorough documentation and dissemination of information throughout the planning process will assist in ensuring the desired continuity in the event personnel and/or organizational changes disrupt the transition.

7.2 Regulatory Issues - Involvement of the State Regulatory Staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

7.3 Timing and Schedules - Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In any case, the relief effort should be planned to be completed at least three months before the existing NPA would exhaust under the highest growth projections.

NPA splits require the establishment of a permissive dialing period during which calls placed to the area to be served by the new NPA can be completed whether the new or the existing NPA code is dialed by the caller. During this time, changes are made to business telephone systems, wireless devices, alarm system networks and individual subscribers' custom calling feature lists. In addition, ANI information and billing/ordering systems may be modified to handle the new NPA code. Central office codes may not be duplicated in the old and new NPAs during this time.

The length of the permissive dialing period may vary depending on the amount of time required to accomplish the above activities. Permissive dialing periods are as short as four months or as long as two years have historically been used. A decision regarding the length of the permissive dialing period, if required, must be a part of the overall Plan. The overall plan should also include a decision that determines the length of time (preferably ninety days to ensure accurate billing and prevent misdirected messages) before a central office code that has moved to the new NPA will be re-assigned in the old NPA once permissive dialing has ended. When establishing transition schedules, consideration should also be given to avoiding the need to make network changes during the busiest times of the year, from the perspectives of call volumes, customer movement and holidays. Other scheduling concerns include the length and type of customer education efforts, the length of time required for network changes and overall budget considerations

7.4 Customer Calling Patterns - Existing and planned local calling areas should be considered during the planning process and retained, wherever practical, along with their existing or planned dialing arrangements. This may prevent regulatory policy delays during implementation and/or unexpected changes to the final plan.

7.5 Interest Group Considerations - It is difficult if not impossible during NPA relief efforts to avoid negative impacts on some customers within the NPA. Whichever alternative relief method is chosen, it is highly possible that one or more customer groups may attempt to influence the decision in a manner which is most favorable to them. Extreme care must be taken by the NPA Relief Coordinator to ensure that fair and equitable treatment is given to all subscribers within an area.

8.0 Updating the RDBS, LASS and BRIDS - At least six months prior to the NPA relief date, the NPA Relief Coordinator should make arrangements for Telcordia Technologies⁵ Traffic Routing Administration (TRA) to update the Routing Database System (RDBS), LIDB Access Support System (LASS) and Business Rating Input Database System (BRIDS)**. Notification to the industry should appear six months prior to the NPA relief date in the Local Exchange Routing Guide (LERG), which is used for message and call setup routing. Ninety days prior to the NPA relief date, the updates should appear in BRADS output products such as the NPA/NXX V&H coordinates diskette and tape. Prior to the NPA relief date, the updates should be reflected in the LIDB Access Routing Guide (LARG), which is used for Alternate Billing Service (ABS) query routing.

9.0 Routing to the New NPA Code - A test number providing an announcement that calls have reached a termination in the new NPA should be made available 4 to 6 weeks prior to the official NPA relief date and remain available throughout the entire permissive dialing period. The test number will enable all carriers and other entities to do the necessary testing to insure that the proper routing changes have been made to direct calls to the new NPA beginning on the relief date. Such changes should be made prior to the relief date, rather than after the relief date during the permissive dialing period. If customers cannot dial the new NPA code during the permissive period because some carriers were unable to complete the necessary effort on the relief date, the usefulness of the permissive dialing period is negated.

10.0 The Permissive Dialing Period - The relief date signals the start of the permissive dialing period. The permissive dialing period should precede mandatory dialing of the new NPA code. During an NPA split, when an NXX is assigned in the new NPA with an effective date prior to or during permissive dialing, a record must be built in RDBS/BRIDS in both the new and original NPA. The NXX in the original NPA will disconnect with an effective

⁵ On March 10, 1999, Bellcore changed its name to Telcordia Technologies.

^{**} A recommended checklist of additional activities concerning the exchange of data/information that should be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief are found in Appendix A.

date equal to the Mandatory dialing date. To reach a telephone in the new NPA during this time, the customer may dial either the existing NPA code and the seven-digit number or the new NPA code and the same seven-digit number.

The length of the permissive dialing period is determined by the NPA Relief Coordinator. This period should allow sufficient time for customers to:

- revise printed materials (e.g., stationery, business cards, labels, bills, etc.)
- reprogram equipment that stores and analyses telephone numbers (e.g., PBXs, cellular phones, modems, speed call lists, automatic dialers)
- update directory listings
- notify customers and business associates
- change advertising (e.g., print ads, classified ads, promotional materials, etc.)

11.0 ANI and Records Conversion - ANI and records conversion should begin on or after the start of permissive dialing. ANI conversions are performed on a central office-by-central office basis and usually takes place over two or three months. It is recognized that the tasks of ANI and records conversion are complex and interdependent and that these efforts must be coordinated. Moreover, it is further recognized that records conversion can occur either before or after ANI conversion. Accordingly, for each NPA split/overlay, the time of the records conversion, whether it occurs before or after ANI conversion, will be coordinated by the NPA Relief Coordinator.

ANI conversions should not take place prior to permissive dialing in order to avoid potential problems with CLASS services.

12.0 Mandatory Dialing - The end of the permissive dialing period is the date that mandatory dialing of the new NPA code begins. All calls to both the old and new NPA codes must be dialed with the correct NPA. All misdialed calls will be intercepted by a recording and an instructional announcement will be provided.

Once the date for mandatory dialing has been established, any change which would advance that date should be made known to all parties no later than thirty days prior to the new date.

13.0 Maintenance of These Guidelines - These guidelines were developed by the NPA Code Relief Workshop of the Industry Numbering Committee (INC). Any recommended changes or modifications to these guidelines should be directed to the Industry Numbering Committee.

14.0 Glossary

ANI CONVERSION – The process by which the NPA portion of the calling party's automatic number identification (ANI) from end offices located in the new NPA changes from the old NPA to the new NPA.

COCUS – Central Office Code Utilization Survey (COCUS) is conducted annually by NANPA from direct input received from Central Office Code Administrator(s) in order to monitor central office code utilization, projected exhaust of NPAs and demand for new NPAs to provide code relief. The purpose of COCUS is to provide an annual overall view of both present and projected CO code (NNX/NXX) utilization for each NPA in the NANP.

Code Administrator – Entity(ies) responsible for the administration of the NXXs within an NPA.

Code Holder – The entity to whom a CO code (NNX/NXX) has been assigned for use at a Switching Entity or Point of Interconnection it owns or controls.

Conservation – Consideration given to the efficient and effective use of a finite numbering resource in order to minimize the cost and need to expand its availability, while at the same time allowing the maximum flexibility in the introduction of new services, capabilities and features.

Consensus – Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome of the result. Substantial agreement means more than a simple majority, but not necessarily unanimity.

Jeopardy NPA – A jeopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief. Accordingly, pending exhaust of NXX resources within an NPA does not represent a jeopardy condition if NPA relief has been or can be planned and the additional NXXs associated with the NPA will satisfy the need for new NXX codes.

Mandatory Dialing Date – The date where permissive dialing ends and the new NPA must be dialed to complete the call.

Moderator – An employee of the CO Code Administrator's organization which presides over NPA Code Relief coordination meetings. Responsibilities usually include issuing the

meeting announcement, coordinating meeting arrangements, leading the meeting, issuing meeting minutes and other duties as necessary to conduct the meeting.

NANP – The North American Numbering Plan is a numbering architecture in which every station in the areas served by the NANP is identified by a unique ten-digit address consisting of a three-digit NPA code, a three-digit central office code of the form NNX/NXX, and a four digit line number of the form XXXX, where N represents the digits 2-9 and X represents any digit 0-9.

NANPA – North American Numbering Plan Administration. With divestiture, key responsibilities for coordination and administration of the North American Numbering/Dialing Plans were assigned to NANPA. These central administration functions are exercised in an impartial manner toward all industry segments while balancing the utilization of a limited resource.

NPA – Numbering Plan Area, also called an area code. An NPA is the three-digit code that occupies the A, B and C positions in the ten digit NANP format that applies throughout the areas served by the NANP. NPAs are of the form NO/1X, where N represents the digits 2-9 and X represents any digit 0-9. After 1/1/95, NPAs will be of the form NXX. In the NANP, NPAs are classified as either geographic or non-geographic.

A. Geographic NPAs are NPAs which correspond to discrete geographic areas served by the NANP.

B. 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.

NPA Code Relief – NPA code relief refers to an activity that must be performed when an NPA nears exhaust of its 640 NNX or the 792 NXX capacity. Relief is typically provided to an NPA about a year before its capacity is reached. NPA code relief for an NPA that is nearing the 640 NNX limit is usually provided in the form of implementing interchangeable central office code (ICOC) which provides an additional 152 assignable central office codes. An NPA that has been implemented as ICOC has a capacity of 792 assignable NXX central office codes. Providing code relief to such an NPA normally takes the form of assigning a new NPA for an NPA split or overlay. Another option is changing the boundary of the existing NPA.

NPA Relief Coordinator – The organization responsible for the overall coordination of the NPA relief activity.

NPA Relief Date – The date by which the NPA is introduced and routing of normal commercial traffic begins.

Permissive Dialing Period - The time frame beginning with the introduction of the new NPA whereby both the old and new NPA can be dialed. The beginning of permissive dialing is coincident with the relief date and ends with the mandatory dialing date.

Pool Administrator - Entity responsible for the administration of the NXX-X blocks within an NPA.

Premature Exhaust – (When referring to NANP): Premature exhaust means the exhaust of NANP resources (i.e., requires expansion beyond the ten digit format) much sooner than the best industry projections. The NANP is expected to meet the numbering needs of the telecommunications industry well into the 21st century (i.e., a minimum of twenty-five years). (When referring to NPA): Premature exhaust is when a specific date for NPA relief has been established and the NPA is projected to exhaust prior to that date.

Records Conversion – The process by which all appropriate records are converted to the new NPA. All documents that require an area code must indicate the new NPA when appropriate (e.g., access service request).

Relief Options – The relief options shall cover a period of at least five years beyond the predicted date of exhaust and shall cover more than one relief activity, if necessary, during the time frame. The relief options shall be a living, evolving document and shall reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, etc.) The annual COCUS analysis shall be used as one of the tools in updating the options.

Relief Plan – The relief plan will evolve from the relief options shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

Service Providers – Any entity that is authorized, as appropriate, by local governmental, state, federal or governmental authorities covering areas served by the NANP to provide communications services to the public.

Testing Period – Time frame prior to permissive dialing that the new NPA will be open so that carrier and other entities can begin testing their networks.

Thousand Block (NXX-X) Number Pooling - A number administration assignment process which allocates thousand blocks within the same NXX to a shared reservoir associated with a designated geographic area.

Working Telephone – The quantity of telephone numbers within existing CO codes.

Numbers (TNs) – (NNX/NXX) which are assigned to working subscriber access lines or their equivalents, e.g., direct inward dialing trunks, paging numbers, special services, temporary local directory numbers (TLDNs), etc., within a switching entity/POI.

Appendix A**Checklist for NPA Code Relief Coordinator**

The following are specific activities concerning the exchange of data/information that can be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief.

1. Avoid last minute changes to data e.g., information contained in the RDBS (the source of the LERG) and BRIDS (the source of Vertical & Horizontal Master Data) that is directly related to NPA relief activity.
2. Provide a list of LEC companies in a given NPA that are impacted by the NPA relief activity and, if known, a contact within each company.
3. Specifically identify and convey any changes in trunking arrangements associated with NPA relief activities.
4. Avoid NXX activation and/or changes occurring simultaneously with an NPA split or other relief activity.
 - If new NXXs must be activated, separately identify these codes to access purchasers as well as providing this information via the LERG.
5. Avoid carrier ownership changes simultaneously with an NPA split or other relief activity.
6. Avoid duplicating NXX codes in the old and new NPAs during the permissive dialing period as well as on the mandatory dialing date.
7. NPA Relief Coordinators should include the Telcordia Technologies Traffic Routing Administration (TRA) on their distribution of NXX information associated with an NPA split or other relief activity.
8. The NPA Relief Coordinator will be the point of contact for matters concerning the NPA split or other relief activity. In addition, Telcordia Technologies TRA will also be a point of contact to resolve discrepancies between NPA relief information shown in the RDBS and BRIDS products versus that provided by a given NPA Relief Coordinator.

Appendix B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered by the NPA Relief Coordinator to determine the advantages of the proposed relief alternatives.

Subscribers

- quantity of subscribers who will need number changes
- impact on CPE, e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- public reaction to and political involvement in boundary decisions
- impact on market identity/recognition, geographic identity, public familiarity
- public costs (stationary, business cards, customer premise equipment (CPE) and database reprogramming.

Network and Service Providers

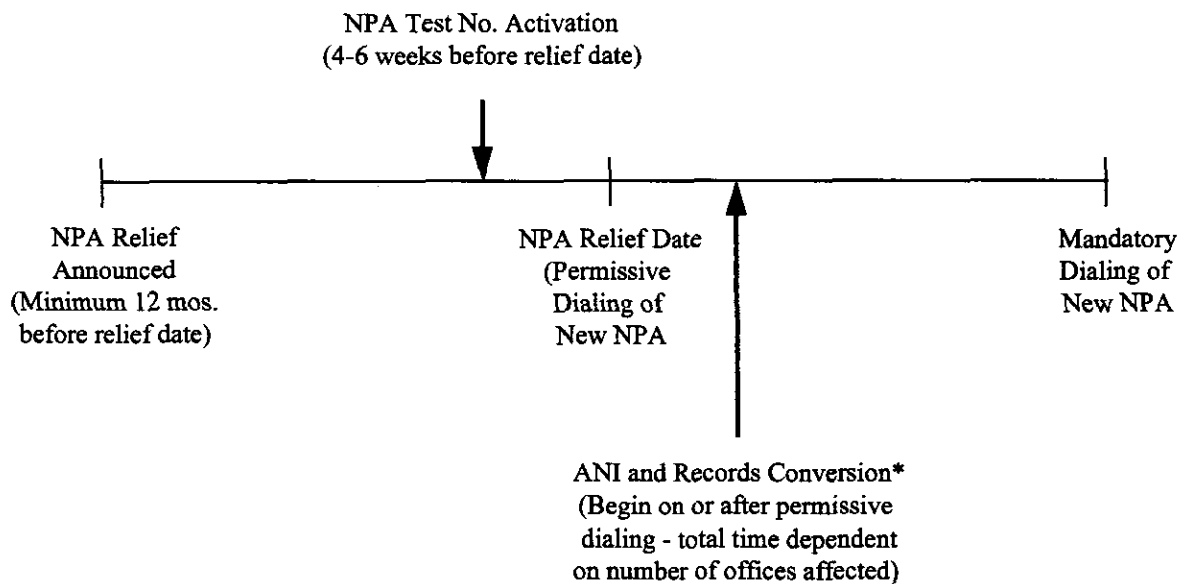
- hardware and software upgrades to switching systems
- modification to or replacement of some operating supporting systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks

Industry Concerns

- length of relief period
- NPA code utilization
- Number Pooling impact on length of relief period (where applicable)

Appendix C

Industry Notification of NPA Relief Activity Timeline



* Records conversion may occur before or after ANI conversion

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on January 10, 2000.

Mimi B. MacDonald / TM

Mimi B. MacDonald

DAN JOYCE
MISSOURI PUBLIC SERVICE COMMISSION
301 W. HIGH STREET, SUITE 530
JEFFERSON CITY, MO 65101

MICHAEL F. DANDINO
OFFICE OF THE PUBLIC COUNSEL
301 W. HIGH STREET, SUITE 250
JEFFERSON CITY, MO 65101