

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Telephone Number                             )  
Relief for the 573 Area Code                                 )     File No. TO-2022-XXXX

**MOTION TO OPEN A DOCKET AND ISSUE AN ORDER  
DIRECTING WORK ON OVERLAY IMPLEMENTATION PLAN  
AND MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its *Motion to Open a Docket and Issue an Order Directing Work on Overlay Implementation Plan and Motion for Expedited Treatment* respectfully states as follows:

1.     On February 25, 2022, the North American Numbering Plan Administrator (“NANPA”) notified Staff of the need for relief in the “573” numbering plan area (“NPA” also known as “area code”). NANPA indicated in its letter, which is attached as Attachment A, that the 573 area code is projected to exhaust during the first quarter of 2025 if relief planning is not granted. The letter from NANPA outlines its actions and projections regarding the exhaustion of the 573 NPA.

2.     In general, telephone number relief can be accomplished through an overlay or a geographic split. In brief, an overlay plan introduces a new area code within the entire area code, so that multiple area codes are assigned to the same area.

An overlay plan does not require any customers to change telephone numbers, but it does require a ten-digit local dialing. In contrast, a geographic split plan attempts to preserve seven-digit local dialing by dividing an area code into two different regions, which would require some customers to change their telephone numbers to reflect the new area code.

3. Consumers in the 573 NPA had previously gone through one geographic split when it split from the 314 NPA, and at that time the consumers of the 573 NPA had to change their telephone numbers. A geographic split in this instance will require half of the 573 NPA consumers to change their telephone numbers once again.

4. In the attached Staff Memorandum, labeled as Appendix A, Staff recommends the Commission approve and implement an overlay plan for the 573 NPA and direct NANPA to implement an overlay plan for the 573 NPA without exploring a geographic split option. The overlay plan is the most efficient and long-term solution for telephone number relief. In addition, a geographic split is likely to be more disruptive to consumers. Maintaining seven digit local dialing is no longer a priority for most consumers as evidenced by the lack of any negative feedback from consumers in four of Missouri's area codes eliminating seven digit local dialing to accommodate the 988 abbreviated dialing code. An overlay plan is currently being implemented in the 314 and 816 area codes.

5. NANPA is required to begin telephone number relief thirty six (36) months in advance of telephone number exhaustion. If the Commission can make such a decision by May 1, 2022 to adopt an overlay plan, then work associated with developing a geographic split option can be avoided. If the Commission is unable to make a decision by May 1, 2022, then NANPA will need to initiate relief planning efforts that include the development of a geographic split option.<sup>1</sup>

6. Pursuant to Commission Rule 20 CSR 4240-2.080(14), Staff asks the Commission to issue the requested order by May 1, 2022. The order should simply specify

---

<sup>1</sup> If that happens then NANPA will submit a geographic split option for the Commission's consideration later this summer.

the overlay plan will be the form of telephone numbering relief for the 573 area code. Issuing an order on or before May 1, 2022, will benefit telecommunication customers and the general public in the 573 area code area by timely beginning the implementation of a plan to relief those customers from the anticipated exhaustion of available numbers in the 573 area code. In addition, because an order will only begin the process for implementing an overlay plan, there will be no negative effects on telecommunication customers in the 573 area code or the general public if the Commission issues an order by May 1, 2022. This pleading was filed as soon as practical after notification from NANPA.

**WHEREFORE**, as set forth in Staff's Recommendation memorandum and NANPA's letter, Staff recommends the Commission open a docket and issue an Order by May 1, 2022, pursuant to 20 CSR 4240-2.080(14), whereby directing NANPA to begin implementing an overlay plan for the 573 NPA.

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey  
Senior Staff Counsel  
Missouri Bar No. 59027  
Attorney for the Staff of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-6279  
573-751-9285 (Fax)  
[scott.stacey@psc.mo.gov](mailto:scott.stacey@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 18<sup>th</sup> day of March, 2022.

**/s/ J. Scott Stacey**

## MEMORANDUM

To: Official Case File  
Case No. TO-2022-XXXX

From: Kari Salsman, Senior Research/Data Analyst  
John Van Eschen, Regulatory Compliance Manager  
Telecommunications Department

Subject: Staff's Recommendation of an Overlay Plan for Exhaustion Relief in  
the 573 Numbering Plan Area Code

Date: March 18, 2022

This memorandum recommends the Missouri Public Service Commission (Commission) approve an overlay plan to be implemented for number exhaustion relief in the 573 Numbering Plan Area Code (area code). On February 25, 2022, the North American Numbering Plan Administrator (NANPA) notified Staff of the need for relief in the 573 area code. The 573 area code is projected to exhaust, absent relief planning, during the first quarter of 2025. The attached letter from NANPA outlines the relief process.<sup>1</sup>

In general, telephone number relief can be accomplished through either an overlay plan method or a geographic split plan method. The overlay method introduces a new area code within the entire area code so that multiple area codes are assigned to the same area. An overlay does not require any customers to change telephone their number, but does require ten-digit local dialing. The geographic split method attempts to preserve seven-digit local dialing by dividing an area code into two different areas, but customers in one of the areas will be assigned a new area code and need to change their telephone number.

Staff is recommending the Commission approve an overlay plan over the alternative of a geographic split plan. The main benefit of a geographic split plan is to preserve seven-digit local dialing, however interest in preserving seven-digit local dialing has declined.<sup>2</sup> In order to implement a geographic split, unpopular decisions will need to be made such as where to draw the boundary for the two area codes and which area will receive a new area code, which requires approximately one half of current consumers in that area to change their telephone number. Consumers in the 573 area code have already gone through one geographic split from the 314 area code and at that time the telephone numbers of all consumers in the area designated as the new 573 area code had to change their telephone number.<sup>3</sup> Implementing the geographic split

---

<sup>1</sup> NANPA is responsible for initiating area code relief to prevent exhaust of numbering resources before relief is implemented. Relief planning begins 36 months prior to the projected exhaust of the area code.

<sup>2</sup> According to NANPA, a geographic split plan hasn't been used for numbering relief since 2007.

<sup>3</sup> In 1996 the 573 area code was created from a geographic split of area code 314 in Case No. TO-98-212.

method for number relief of the 573 area code will result in some consumers changing their number for the second time due to a geographic split.

Staff believes that an overlay plan is the most efficient and long-term solution for telephone number relief. An overlay plan doesn't require existing consumers to change their telephone number and avoids the need for public involvement concerning split boundaries and which side should retain the old area code. An overlay plan does result in the requirement to dial local calls using ten digits, however most consumers already use ten-digit dialing for all calls. As a result of the FCC's directive to require ten-digit local dialing to enable 988 as an abbreviated dialing code to reach the National Suicide Prevention Lifeline, four of Missouri's six area codes will already be transitioned to ten-digit local dialing.<sup>4</sup> No consumers have complained in the four Missouri area codes transitioning to mandatory ten-digit local dialing. An overlay plan is also currently being implemented in the 314 and 816 area codes in Missouri.<sup>5</sup>

Staff recommends the Commission approve an overlay plan over a geographic split plan and direct NANPA to move forward with the implementation of an overlay plan, without exploring the option of a geographic split plan.

#### **Attachment A: Notification by NANPA of the Need for Relief for the 573 Area Code**

---

<sup>4</sup> FCC directive requires ten-digit local dialing in any area code that has issued telephone numbers with a "988" prefix in a seven digit telephone number. This national directive will enable the three-digit code "988" to be an abbreviated dialing code to access the national suicide prevention and mental health crisis hotline effective July 16, 2022.

<sup>5</sup> Case No. TO-2022-0010.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

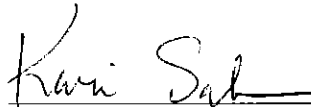
In the Matter of Telephone Number Relief            )  
For 573 Area Code    )     **File No. TO-2022-XXXX**

**AFFIDAVIT OF KARI SALSMAN**

STATE OF MISSOURI     )  
                                  )     ,ss.  
COUNTY OF COLE     )

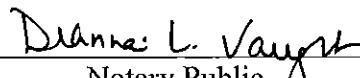
**COME NOW** Kari Salsman, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Motion to Open Docket* ; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

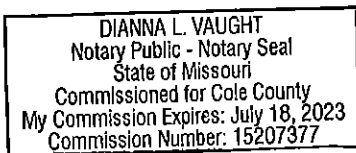
Further the Affiants sayeth not.

  
\_\_\_\_\_  
Kari Salsman

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of March, 2022.

  
\_\_\_\_\_  
Notary Public



**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

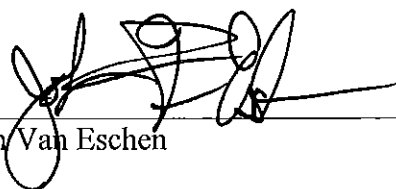
In the Matter of Telephone Number Relief            )  
For 573 Area Code    )        **File No. TO-2022-XXXX**

**AFFIDAVIT OF JOHN VAN ESCHEN**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE        )

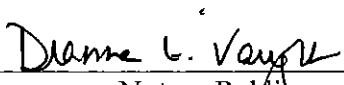
**COME NOW** John Van Eschen, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Motion to Open Docket* ; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

  
\_\_\_\_\_  
John Van Eschen

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of March, 2022.

  
\_\_\_\_\_  
Notary Public

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2023  
Commission Number: 15207377





February 25, 2022

John Van Eschen  
Manager Telecommunications  
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 the Need for Relief for the 573 Numbering Plan Area (NPA) Code*

Dear Mr. Van Eschen:

As discussed during our meeting yesterday, the North American Numbering Plan Administrator (“NANPA”), as the neutral third-party Numbering Plan Area (NPA) relief planner for Missouri, hereby notifies you of the need for relief in the 573 NPA. Relief planning begins 36 months prior to the projected exhaust of the NPA<sup>1</sup>. Absent relief, the 573 area code is projected to exhaust during the first quarter of 2025.

To begin the relief planning process, NANPA will schedule a meeting with the Industry<sup>2</sup> to review an Initial Planning Document (IPD). The IPD will contain background information for the 573 NPA, and two alternatives for relief, including the life and attributes of each alternative. The Industry will reach consensus on which relief alternative from the IPD (or any additional alternatives suggested by the Industry)

---

<sup>1</sup> 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.

<sup>2</sup> The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 573 area code.

they will recommend to the Missouri Public Service Commission (“Commission”). The Industry will also determine the dialing plan and implementation intervals to be included in the relief petition. NANPA will then draft a petition which will be reviewed by the Industry at a meeting held within four weeks of the IPD meeting to review and make any edits to the relief petition. The petition for relief will then be filed no later than 2 weeks from the date of the draft petition review meeting (six weeks from the IPD meeting date).

If consensus is reached by the Industry for an overlay, and because the 573 NPA is not transitioning from 7-digit to 10-digit local dialing as part of the implementation of the 988 abbreviated dialing code to reach the National Suicide Prevention Lifeline, the Industry has recently been recommending a 13-month implementation interval to allow for the customer education and the network preparation required to transition from 7 to 10-digit local dialing. The Industry’s implementation plan includes implementation timeframes without specific dates so that the Industry has the flexibility to accommodate holidays and network freeze periods, high traffic days and implementation dates for other NPA relief activities occurring in other parts of the country. The new area code should be in service six months prior to exhaust of the NPA.<sup>3</sup> The petition will be requesting that, to the extent possible, the Commission forego in-person meetings and hearings in favor of written comments and reply comments.

---

<sup>3</sup> The NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, July. 2, 2021) (“NPA Relief Planning Guidelines”) require that relief be implemented six months prior to exhaust.

NANPA requires approximately 75 days from the date of an Order for assignment of the new NPA, release of a press release announcing the new NPA, to schedule and facilitate an Industry implementation meeting, and publish a Planning Letter.

Thank you for your time. If you should have any questions, please do not hesitate to contact me directly at 925-420-0130/ [cmccabe@nanpa.com](mailto:cmccabe@nanpa.com).

Respectfully submitted,

A handwritten signature in black ink that reads "Cecilia McCabe". The signature is written in a cursive, flowing style.

Cecilia McCabe,  
NPA Relief Planner  
13221 Woodland Park Road, Suite 200  
Herndon, VA 20171

Cc: Heidi Wayman