

3. In general, telephone number relief can either 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 doesn't require any customers to change telephone numbers but it does require 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 but customers in one of the regions will need to change their telephone numbers to reflect a new area code.

4. Staff recommends an overlay plan is the logical course of action to provide numbering relief for the 314 and 816 area codes. NANPA references how both area codes will have implemented mandatory 10-digit local dialing by July 15, 2022 to accommodate the new "988" abbreviated dialing code as described in Case No. TO-2021-0155. NANPA states that the only option for relief of the area codes is the already Commission-approved overlays ordered in TO-2000-0374. The overlays would not require existing customers to change their NPAs or telephone numbers. The dialing plan, as laid out in Attachment A, would also remain unchanged.

5. NANPA held an industry meeting on June 8, 2021, which the telecommunications members of Staff attended. The industry voted by consensus to implement relief for each area code in accordance with a nine-month schedule. NANPA proposes that the schedule will prevent any denials or delays of service related to the new call origination (CO) codes.

6. The industry intends to move forward with the implementation of the overlay plans 60 calendar days from the filing date of its letter, or August 29, 2021, unless the Commission directs otherwise. Staff provides this information for the knowledge of the Commission. If the Commission wishes to permit the industry to proceed, it does not need to take any additional actions before August 29. Staff would recommend that the Commission permit the overlay plans to be implemented in accordance with its September 25, 2001 order.

WHEREFORE, Staff prays that the Commission will accept this *Motion to Open Informative Docket and Notice*; will issue an order that opens a docket for this matter; will permit the industry to implement the overlay plans as ordered in Docket No. TO-2000-0374; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 15th day of July, 2021, to all counsel of record.

/s/ Whitney Payne