DOCKET NO. 20220036-TP
FILED 2/17/2022
DOCUMENT NO. 01299-2022
FPSC - COMMISSION CLERK

NANPA
North American Numbering Plan Administrator

February 17, 2022

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Petition of the North American Numbering Plan Administrator on Behalf of the Florida Telecommunications Industry In the Matter of the Implementation for Relief of the 904 Numbering Plan Area

Dear Commission Clerk,

Enclosed for filing is the *Petition of the North American Numbering Plan Administrator on Behalf of the Florida Telecommunications Industry In the Matter of the Implementation for Relief of the 904 Numbering Plan Area* including supporting Exhibits A and B.

Thank you for your assistance in this matter. Please feel free to contact me should you have any questions concerning this filing.

Respectfully submitted,

/s/Florence Weber
Florence Weber

Senior Director,
North American Numbering
PlanAdministrator
925-420-0340
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Before the
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of the	**)**	
Implementation for Relief of	**)**	**Docket No._____**
the 904 Numbering Plan Area	**)**	

PETITION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE FLORIDA TELECOMMUNICATIONS INDUSTRY

The North American Numbering Plan Administrator ("NANPA"), as the neutral third-party numbering plan area ("NPA") (also referred to as "area code") relief planner for Florida and on behalf of the Florida telecommunications industry ("Industry"),[1] hereby notifies the Florida Public Service Commission ("Commission")[2] that the 904 NPA, serving northeast Florida, is projected to exhaust its Central Office codes (often referred to as "CO" or "NXX" codes) during the third quarter of 2024 and is in need of relief. This means that absent NPA relief, the supply of CO codes in the 904 NPA is projected to run out during the projected exhaust quarter. The Industry respectfully requests that the Commission approve the Industry's plan to implement an all-services distributed overlay as set forth herein.

[1] The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 904, 352, and 386 NPAs.

[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.

The Industry recommends that it implement the all-services distributed overlay based upon a 13-month schedule. Adhering to the Industry agreed-upon timeframes will allow the overlay to be implemented six months prior to the projected exhaust of the 904 NPA.

I. Background

The 904 NPA has been in service since 1965 and is located in the northeastern portion of Florida. It includes all or most of Nassau, Duval, Baker, Bradford, Clay, St. Johns, and Union Counties. It serves the cities of Jacksonville, Jacksonville Beach, Middleburg, Yulee, Fernandina Beach, Orange Park, and other smaller communities.

In 1995, the 904 NPA was nearing exhaust and the Commission approved a geographic split of the 904 NPA, introducing the 352 NPA. Nearing exhaust again, the Commission approved another split of the 904 NPA two years later in 1997, creating the 850 NPA. In 2001, the 904 NPA was again nearing exhaust and the Commission approved another geographic split, introducing the 386 NPA. The 386 NPA is composed of two non-contiguous areas, one at the northwest boundary of the 904 NPA and other at the southern boundary of the 904 NPA. The 904 NPA is also bordered on the north by the Georgia 912 NPA, to the east by the Atlantic Ocean, and to the west by the 352 NPA.

II. Description of Relief Alternatives

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. In October 2021, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2021

NRUF Report") which indicated that the 904 NPA would exhaust during the fourth quarter of 2024. However, due to an increase in CO code requests in the 904 NPA, NANPA issued a "delta NRUF" on January 4, 2022, which revised the estimated exhaust date to the third quarter of 2024.[3] NANPA convened an industry NPA relief planning meeting via web conference on January 13, 2022.[4]

During this meeting the Industry reviewed an Initial Planning Document (IPD)[5] which included six alternatives for relief and reached consensus to recommend Alternative #1, the All-Services Distributed Overlay of the 904 NPA.

Following are the descriptions of each relief alternative that were reviewed and deliberated on by the Industry prior to reaching their decision:

- **Alternative #1: An All-Services Distributed Overlay of the 904 NPA**

Projected life of Alternative #1: 29 years

An all-services distributed overlay is a form of NPA relief wherein a new NPA is assigned to the same geographic area occupied by the exhausting NPA, in this case the 904 NPA. Customers would retain their current telephone numbers and 10-digit local dialing by all customers within and between NPAs in the affected area would be required. CO codes in the new NPA will be assigned upon request with the effective date of the new area code once all available CO codes in the 904 NPA have been exhausted.

[3] October 2021 NRUF and NPA Exhaust Analysis ("October 2021 NRUF Report") and "Delta NRUF". The October 2021 NRUF Report and "Delta NRUF" can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.html.

[4] A copy of the January 13, 2022 meeting minutes is attached as Exhibit A.

[5] A copy of the IPD, which was distributed to the Industry on December 16, 2021, is attached, as Exhibit B.

- **Alternative #2: A Boundary Elimination Overlay between the 904 and 386 NPAs**

Projected combined life of Alternative #2: 9 years

The boundary between the existing 904 NPA and 386 NPA would be eliminated and the 904 and 386 NPAs would be assigned to the same geographic areas occupied by the existing 904 and 386 NPAs. The 904 NPA and 386 NPA customers would retain their current telephone numbers, and 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 NPA will be assigned upon request in the 904 NPA area with the effective date of the new area code boundary and available 904 NPA CO codes will be assigned upon request in the 386 NPA area. The 386 NPA has 33 rate centers, and the current projected exhaust date is fourth quarter 2039. Eliminating the boundary between the 904 NPA and 386 NPA would eliminate the non-contiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. The projected life for the combined 904 and 386 NPAs extends the life of the 904 NPA but causes the 386 NPA to undergo relief 15 years earlier than projected to be needed. Eliminating the boundary between the 904 and 386 NPAs initially saves the addition of an overlay NPA, but only for nine years before an overlay NPA would be needed. Alternative #2 requires customers in the 386 NPA to dial ten digits much sooner than would otherwise be expected and requires additional technical work and potentially more time to implement than Alternative #1.

- **Alternative #3: A Boundary Elimination Overlay between the 904 and 386 NPAs with the addition of a new overlay NPA**

Projected combined life of Alternative #3: 26 years

The boundary between the existing 904 NPA and 386 NPA areas would be eliminated and a new NPA would be assigned to the same geographic area occupied by the existing 904 and 386 NPAs with the effective date of the new area code boundary. The 904 NPA and 386 NPA customers would retain their current telephone numbers, and 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available 904 NPA CO codes will be assigned upon request in the 386 NPA. A new overlay NPA will be added, and CO code assignments will be made from the new overlay NPA once the 904 and 386 NPA available CO codes are exhausted. This relief option would eliminate the non-contiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001 but does not save an NPA. Alternative #3 requires customers in the 386 NPA to dial ten digits much sooner than would otherwise be expected and requires additional technical work and potentially more time to implement than Alternative #1.

- **Alternative #4: A Boundary Elimination Overlay between the 904, 386 and 352 NPAs with the addition of a new overlay NPA**

Projected combined life of Alternative #4: 17 years

The boundaries between the existing 904, 386 and 352 NPA areas would be eliminated and a new NPA would be assigned to the same geographic areas occupied by the existing 904, 386 and 352 NPAs with the effective date of the new area code boundary. The 904, 386 and 352 NPA customers would retain their current telephone

numbers, and 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 and 352 NPAs will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available CO codes in the 904 NPA will be assigned upon request in the 386 and 352 NPAs. The 352 NPA has 48 rate centers, and the current projected exhaust date is first quarter 2026. CO code assignments will be made from the new overlay NPA once the 904, 386 and 352 NPA available CO codes are exhausted. This relief option would eliminate the non-contiguous boundary of the 386 NPA, reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001, and provides relief for the 352 NPA which, depending upon any changes in the exhaust projection, will be initiated by NANPA in 2023. However, it does not save an NPA and requires customers in the 386 NPA to dial ten digits much sooner than would otherwise be expected. Alternative #4 requires additional technical work and potentially more time to implement than Alternative #1.

- **Alternative #5: A Boundary Elimination Overlay between the 904 NPA and 352 NPA with the addition of a new overlay NPA**

Projected combined life of Alternative #5: 17 years

The boundary between the existing 904 NPA and 352 NPA areas would be eliminated and a new NPA would be assigned to the same geographic areas occupied by the existing 904 and 352 NPAs with the effective date of the new area code boundary. The 904 and 352 NPA customers would retain their current telephone numbers, and 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 352 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available 904 NPA CO

codes will be assigned upon request in the 352 NPA. CO code assignments will be made from the new overlay NPA once the 904 and 352 NPA available CO codes are exhausted. This relief option provides relief for the 352 NPA which, depending upon any changes in the exhaust projection, will be initiated by NANPA in 2023. However, it does not save an NPA, and requires additional technical work and potentially more time to implement than Alternative #1.

- **Alternative #6: A Geographic Split within the 904 NPA**

Projected lives for Alternative #6:
Area A: 33 years **Area B (Jacksonville rate center): 26 years**

The 904 NPA would be split into two distinct geographic areas and a new NPA would be assigned to one of the areas formed by the split. Ten-digit local dialing would be required between the two NPAs. However, within each NPA, seven-digit local dialing would be permitted. The proposed split boundary would separate the Jacksonville rate center to one side of the split boundary line, or Area B, and the remaining 18 rate centers would be in Area A of the split boundary line. No recommendation is made for which side of the split line would receive the new NPA, and the Commission would have to make the difficult decision of which side would retain the 904 NPA. Alternative #6 requires significantly more technical work and time to implement than Alternative #1.

III. Description of the Recommended Relief Alternative

The all-services distributed overlay would add a new NPA over the same geographic area covered by the existing 904 NPA and is projected to last approximately 29 years. NANPA will assign CO codes from the new overlay NPA

once all available CO codes from the 904 NPA are exhausted. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. However, 10-digit local dialing by all customers within and between NPAs in the affected area would be required.

The all-services distributed overlay in Alternative #1 is recommended by the Industry for the 904 NPA because the other alternatives not only have shorter projected lives but have additional technical and customer education issues that would complicate and potentially prolong implementation.

The Industry-recommended dialing plan for the all-services distributed overlay is set forth in the following table:

DIALING PLAN
Dialing Plan for the 904 All-Services Distributed Overlay

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's discretion

The Industry reached consensus to implement the new relief NPA in accordance with a 13-month schedule.[6] The schedule does not include specific dates, but rather timeframes to identify the phases of implementation. Once the Commission has approved the instant Petition, the Industry will select specific

[6] 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.

dates at an implementation meeting to ensure the dates do not interfere with certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission's prompt approval of the instant Petition and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

The Industry-agreed upon implementation timeframe schedule is set forth in the following table:

Implementation Timeframe Schedule
for the 904 All-Services Distributed Overlay[7]

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within existing NPA can be dialed using 7 or 10 digits).* *Mandatory* dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period *(Effective date for codes from the new NPA)* *	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

**CO codes in the new NPA will not be assigned until all available codes in the existing 904 NPA are exhausted.*

IV. Conclusion

The Industry requests that the Commission issue an order in response to the instant Petition approving an all-services distributed overlay relief plan for the 904

[7] It should be noted that NANPA requires approximately 75 days from the date of the Consummating Order for assignment of the new NPA, issuance of a press release by the Commission announcing the new NPA, to schedule and facilitate an Industry implementation meeting, and publish a Planning Letter.

NPA and the recommended implementation schedule without a hearing. To the extent possible, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this petition, the Industry will implement an all-services distributed overlay over the 904 NPA in accordance with the implementation schedule set forth above. As such, the Industry requests that the Commission grant this petition no later than July 31, 2022.

Respectfully submitted,

/s/ *Florence Weber*
Florence Weber

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February 17, 2022

EXHIBIT A

February 2, 2022

To: All 904 NPA Code Holders and Interested Industry Members (Florida)

Subject: Final Minutes of the Initial Planning Meeting for the 904 NPA

Attached are the final minutes from the January 13, 2022, Florida 904 NPA Initial Planning meeting. These minutes became final on February 2, 2022 and were posted to the NAS-NANP Notification System (NAS-NNS) website and are available for download. Please go to www.nationalnanpa.com and click on NAS Login. A Username and Password are required for NAS Login to access this document.

To access NAS-NNS and download the reference documents: (log into NAS, access "View Documents" and select the appropriate State, NPA and the "NPA Relief Planning" category). If you are unable to do so, contact the NANPA customer support desk at 866-623-2282 for assistance.

If you have any questions, please give me a call at (925) 420-0130 or contact me by email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Sakina Deas – Florida Public Service Commission Staff

FLORIDA 904 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE
FINAL MINUTES
January 13, 2022

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Cecilia then reviewed the agenda.

REVIEW CONSENSUS PROCESS

Cecilia stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a "Statement for the Record," which could be conveyed at any point during the meeting.

NANPA's ROLE AND RESPONSIBILITIES

Cecilia reviewed NANPA's role and responsibilities for the meeting as follows:

- Starts the relief planning process 36 months prior to exhaust of the NPA.
- Distributes the Initial Planning Document (IPD) at least four weeks prior to the first industry meeting, which was completed on December 16, 2021.
- The main objective is to reach consensus on the relief alternative to be included in the petition.
- Determines any additional items to include in the relief filing with the Florida Public Service Commission ("Commission") such as the implementation intervals, dialing plan, and compliance with any state-specific requirements.

REVIEW NPA RELIEF PLANNING GUIDELINES

Cecilia reviewed pertinent sections of the NPA Code Relief Planning and Notifications Guidelines ATIS-0300061 ("Guidelines"). Section 5 of the Guidelines state: "The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months*."*

Section 5.0 of the Guidelines also state: "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*."*

Cecilia reviewed section 6.1 of the Guidelines regarding an NPA split which states:

*"*By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA*."*

Cecilia also reviewed Section 6.3 of the Guidelines regarding an all-services distributed overlay which states:

*"*An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs. Some states require 1 + 10 digit local dialing, and some require 10-digit local dialing and allow 1 + 10 digit local dialing at the SP's discretion. The overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay allows the option to eliminate the permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an NPA overlay.*"*

Cecilia noted that a boundary elimination overlay was also a viable option of relief for the 904 NPA as stated in section 6.3.2 of the Guidelines.

"With a boundary elimination 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 elimination 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 a limitation of boundary realignment because it offers shorter-term relief."

Cecilia also reviewed Section 7.2 of the Guidelines which state:

"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 general, the relief implementation should be in place six months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three months before the existing NPA would exhaust under the highest growth projections."

Cecilia also referred the industry participants to Annex B of the Guidelines which lists issues to be considered during NPA relief planning, and Annex E which lists general attributes of the most common relief alternatives.

Cecilia stated that the referenced sections of the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS

The 904 NPA has been in service since July 11, 1965. In 2001, the 904 NPA was split, creating the noncontiguous 386 NPA. The 904 NPA serves Northeast Florida and includes all or most of Nassau, Duval, Baker, Bradford, Clay, St. Johns and Union Counties. Cities in the 904 NPA include but are not limited to Jacksonville, Jacksonville Beach, Middleburg, Yulee, Fernandina Beach, Orange Park and other smaller communities. The 904 NPA is bordered on the north by the Georgia 912 NPA, to the east by the Atlantic Ocean and to the south by the 386 NPA and to the west by the 386 and 352 NPAs.

Exhaust Forecast:
The October 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2021 NRUF Report"), published by NANPA, indicated that the 904 NPA would exhaust during the fourth quarter of 2024. Relief planning is to start in the fourth quarter of 2021.

On January 4, 2022, NANPA issued a revised exhaust forecast, known as a delta NRUF, moving in the projected exhaust forecast date to the third quarter of 2024. The exhaust dates were also revised for the 386 and 352 NPAs because they are impacted by this project: the 386 NPA had the exhaust date move from the second quarter of 2041 to the fourth quarter of 2039 and the 352 NPA had the exhaust date move from the third quarter of 2026 to the first quarter of 2026.

NPA STATUS
904 NPA: As of January 12, 2022, the 904 NPA has 710 Central Office ("CO") codes assigned, 68 CO codes available for assignment, and 22 unavailable CO codes. There are 60 total service providers in the 904 NPA.

386 NPA: As of January 12, 2022, the 386 NPA has 397 CO codes assigned, 382 CO codes available for assignment, and 21 unavailable CO codes. There are 51 total service providers in the 386 NPA and four (4) OCNs that have only thousands-blocks.

352 NPA: As of January 12, 2022, the 352 NPA has 643 CO codes assigned, 130 CO codes available for assignment and 27 unavailable CO codes. There are 55 total service providers in the 352 NPA. (See Attachment #2)

Cecilia stated that NANPA was able to recover five (5) CO codes in the 904 NPA, 10 CO codes in the 386 NPA and two (2) CO codes in the 352 NPA that had previously been held as unavailable CO codes.

THOUSANDS-BLOCK INFORMATION
Cecilia reported that in the 904 NPA, pooling commenced on April 2, 2001, there are 19 rate centers of which 18 are mandatory for pooling and one (1) rate center is optional for pooling. In the period of January 1, 2021 to January 12, 2022, 382 blocks have been assigned and as of January 12, 2022 there are 90 blocks available for assignment to service providers. Pooling has assigned 29 codes in the same period; 23 for pool replenishment, one (1) for dedicated customers and five (5) for LRNs. The forecasted demand for the next twelve months is 11 codes for pool replenishment and dedicated customers.

In the 386 NPA, pooling commenced on July 16, 2001, there are 33 rate centers, of which 15 are mandatory for pooling and 18 are optional for pooling. In the period of January 1, 2021 to January 12, 2022, 311 blocks have been assigned, and as of January 12, 2022 there are 293 blocks available for assignment to service providers. Pooling has assigned 31 codes in the same period; 22 for pool replenishment and nine (9) for LRNs. The forecasted demand for the next twelve months is two (2) codes for pool replenishment and dedicated customers.

In the 352 NPA, pooling commenced on December 17, 2002, there are 48 rate centers, of which 17 are mandatory for pooling and 31 are optional for pooling. In the period of January 1, 2021 to January 12, 2022, 566 blocks have been assigned and as of January 12, 2022 there are 335 blocks available

for assignment to service providers. Pooling has assigned 44 codes in the same period; 35 for pool replenishment and nine (9) for LRNs. The forecasted demand for the next twelve months is 13 codes for pool replenishment and dedicated customers. (See Attachment #3)

Cecilia also reviewed:

- 904 NPA rate center and county maps
- Code holder lists for the 904, 386, and 352 NPAs
- Rate center lists for the 904, 386, and 352 NPAs

REVIEW OF RELIEF PLANNING OPTIONS

Cecilia presented six relief alternatives for the 904 NPA:

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

The new NPA would be assigned to the same geographic area occupied by the existing 904 NPA. Customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. CO codes in the new NPA will be assigned upon request with the effective date of the new area code once all CO codes in the 904 NPA overlay have been exhausted. Upon exhaust of the 904 NPA, all future CO code assignments will be made in the new NPA. The projected life for this Alternative is would be:

Total CO Codes 904 NPA= 708
Total Rate Centers = 19
Area Code Life in Years = 29 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 904 and 386 NPAs would be eliminated and the 904 and 386 NPAs would be assigned to the same geographic areas occupied by the existing 904 and 386 NPAs. The 904 NPA and 386 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary, and available CO codes in the 904 NPA could be assigned upon request in the 386 NPA area. The 386 NPA has 33 rate centers, and the projected exhaust date is fourth quarter of 2039. This relief option would eliminate the noncontiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. Eliminating the boundary between the 904 and 386 NPAs would have a combined life of nine (9) years and would save one NPA. The projected life would be:

904 NPA	**386 NPA**
Total CO Codes = 708	Total CO Codes = 395
Total Rate Centers =19	Total Rate Centers = 33

Combined Area Code Life in Years = 9 years

ALTERNATIVE #3 - BOUNDARY ELIMINATION OVERLAY WITH AN ALL-SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904 and 386 NPAs would be eliminated and a new NPA would be assigned to the same geographic area occupied by the existing 904 and 386 NPAs with the effective date of the new area code boundary. The 904 NPA and 386 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary, and available CO codes in the 904 NPA could be assigned upon request in the 386 NPA. At exhaust of the available CO codes in the 904 and 386 NPAs, all future CO code assignments will be made from a new overlay NPA. This relief option would eliminate the noncontiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. Eliminating the boundary between the 904 and 386 NPAs and adding a new all-services distributed overlay NPA over the combined geographic area would have a combined life of 26 years. The projected life would be:

904 NPA	**386 NPA**
Total CO Codes = 708	Total CO Codes = 395
Total Rate Centers =19	Total Rate Centers = 33

Combined Area Code Life in Years = 26 years

ALTERNATIVE #4 - BOUNDARY ELIMINATION OVERLAY FOR THREE NPAS WITH AN ALL-SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904, 386, and 352 NPAs would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 904, 386 and 352 NPAs with the effective date of the new area code boundary. The 904 NPA, 386 NPA and 352 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 and 352 NPAs will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available CO codes in the 904 NPA could be assigned upon request in the 386 and 352 NPAs. The 352 NPA has 48 rate centers, and the projected exhaust date is first quarter of 2026. This relief option would eliminate the noncontiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. Eliminating the boundary between the 904, 386 and 352 NPAs and adding an all-services distributed overlay NPA over the combined geographic area would have a combined life of 17 years. The projected life would be:

904 NPA	**386 NPA**	**352 NPA**
Total CO Codes = 708	Total CO Codes = 395	Total CO Codes = 637
Total Rate Centers =19	Total Rate Centers = 33	Total Rate Centers = 48

Combined Area Code Life in Years = 17 years

ALTERNATIVE #5 - BOUNDARY ELIMINATION OVERLAY WITH AN ALL-SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904 and 352 NPAs would be eliminated and a new NPA would be assigned to the same geographic area occupied by the existing 904 and 352 NPAs with the effective

date of the new area code boundary. The 904 NPA and 352 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 352 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary, and available CO codes in the 904 NPA will be assigned upon request in the 352 NPA. Eliminating the boundary between the 904 and 352 NPAs and adding a new all-services distributed overlay NPA over the combined geographic area would have a combined life of 17 years. The projected life would be:

904 NPA	**352 NPA**
Total CO Codes = 708	Total CO Codes = 637
Total Rate Centers =19	Total Rate Centers = 48

Combined Area Code Life in Years = 17 years

ALTERNATIVE #6 – GEOGRAPHIC SPLIT

The 904 NPA would be split into two geographic areas and a new NPA would be assigned to one of the areas formed by the split. Ten-digit local dialing would be required between the two NPAs. Within an NPA, seven-digit local dialing would be permitted. The proposed split boundary would separate the Jacksonville rate center to one side of the split boundary line, or Area B, and the remaining 18 rate centers on the other side of the split boundary line would be Area A. No recommendation is made for which side of the split line would receive the new NPA. The Commission would decide if Area A or Area B would retain the 904 NPA. The projected life of area A was updated from 34 years of life to 33 years of life due to the revised exhaust projection due to increased CO code demand. The projected lives for each area would be:

Area A	**Area B**
Total CO Codes = 251	Total CO Codes = 457
Total Rate Centers =18	Total Rate Centers 1 (Jacksonville rate Center)
Area code life in years = 33	Area code life in years = 26

CONSENSUS ON THE RELIEF ALTERNATIVE

The Industry had extensive discussion about which relief alternative would be recommended to the Commission. It was initially decided to eliminate Alternatives 2, 4, 5, and 6 due to the shorter lives of those alternatives. A question was asked as to whether the non-contiguous 386 NPA was an issue. Greg Fogleman, from the Commission, stated that it was something that the Commission had been reviewing for the past year. He also stated there are not many non-contiguous NPAs. A participant suggested that in addition to the usual technical concerns, there may be technical implementation issues related to having multiple LATAs with the boundary elimination alternatives.

A proposal was made to recommend Alternative #1, an All-Services Distributed Overlay, due to having the longest life of all the relief alternatives, and having fewer technical issues to implement than the other alternatives. After further discussion, consensus was reached among the industry members to recommend Alternative #1, the All-Services Distributed Overlay and will be included as the industry's choice of relief in the petition filed with the Commission.

The All-Services Distributed Overlay was the industry's preferred form of relief due to the following pros and cons listed below:

All-Services Distributed Overlay Pros and Cons:

Pros:

Alternative #1	
1	All existing customers would retain the 904 area code and would not have to change their telephone numbers.
2	Does not discriminate against customers on different sides of a boundary line as does a geographic split.
3	Less customer confusion and easier education process.
4	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
6	Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth.
7	No need for synchronization of old and new NPAs in NPAC databases.
8	Minimizes call routing issues, especially with ported numbers.
9	Easier for service providers to implement from a translations, billing, and service order system perspective.
10	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
11	The Commission would not have to decide which side gets the new NPA, so no winners and losers.
12	Does not split cities or counties into different area codes.
13	Keeps communities of interest intact.
14	No impact on some wireless carriers that have to reprogram handsets manually.
15	No technical impacts to number portability, text messaging or multimedia messaging.
16	An all-services distributed overlay is simplest to implement from both a technical and customer education perspective.
17	Helps move customers toward nationwide 10-digit dialing.

Cons:

Alternative #1	
1	Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 904 NPA and the new NPA.
2	Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
3	Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.

Boundary Elimination Overlay Pros and Cons:

Pros:

Alternative					
#2	**#3**	**#4**	**#5**		
X				1	Eliminates need to open new NPA
X	X	X	X	2	Does not require customers to change their area code.
X	X	X	X	3	It is a more efficient use of resources.
		X	X	4	Allows the industry to implement relief for more than one NPA as relief planning is needed in the 352 NPA in approximately 4 years.
X	X	X		5	Would eliminate the noncontiguous boundary between the 904 NPA and 386 NPA

Cons:

Alternative					
#2	**#3**	**#4**	**#5**		
X	X	X	X	1	Boundary elimination alternatives have shorter lives than the All-Services Distributed Overlay
X	X	X	X	2	Impacts a larger quantity of customers than the all-services distributed overlay over only the 904 NPA.
X	X	X	X	3	A more complex customer education process, which could lead to increased customer confusion.
X	X	X		4	The boundary elimination would require 10-digit dialing for the 386 NPA.
X	X	X	X	5	Requires more technical work and time to implement

NPA Split Pros and Cons:

Pros:

Alternative # 6	
1	Maintains seven-digit dialing for local calls within the same NPA
2	Approximately half of customers would experience no change if they keep the 904 NPA

Cons:

Alternative # 6	
1	Requires approximately half of 904 NPA customers to change their area code, thus creating winners and losers.
2	Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
3	Difficult Commission decision on which side retains the 904 NPA.
4	Longer time period needed for service providers to implement this type of relief.

5	Customers whose numbers change must contact friends, family, and business associates with the telephone changes.
6	More complicated and costly to implement for service providers in their billing, translations, and database systems.
7	Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
8	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
9	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
10	Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
11	Split requires significant challenges to service provider's operational support systems and network elements.
12	Splits cause customer confusion with Caller ID during implementation.
13	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
14	Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
15	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
16	Splits require the 800/SMS database to be updated.
17	Splits reduce the geographic area served by one area code.
18	Splits the city(s), counties or legislative districts into different area codes.
19	Splits communities of interest.
20	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

There was discussion regarding the dialing plan. A recommendation was made, and consensus was reached to include the following dialing plan as the dialing plan that will be applied to the 904 NPA with the implementation of an All-Services Distributed Overlay. There was discussion whether Extended Area Service (EAS) should be included in the dialing plan. It was determined that it would remain listed in the dialing plan. There was additional discussion and consensus was reached to also include a note stating 1+10 permissive dialing is permitted at the service provider's discretion.

Consensus was reached on the following dialing plan:

Dialing Plan for the 904 all-services distributed overlay:

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's discretion

IMPLEMENTATION

After discussion on a suggested implementation schedule, consensus was reached on a 13-month implementation schedule as follows:

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within existing NPA can be dialed using 7 or 10 digits)* *Mandatory* dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period *(Effective date for codes from the new NPA)* *	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

**CO codes in the new NPA will not be assigned until all available codes in the existing 904 NPA are exhausted.*

CUSTOMER EDUCATION AND TECHNICAL MILESTONES:

A recommendation was made, and consensus was reached to include the following *Customer Education and Technical Milestones* for the 904 NPA All-Services Distributed Overlay implementation.

Customer Education Milestones:

	Responsibility
1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release	Commission and Service Providers that have the ability (If necessary)

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 the consumers of 10-digit dialing and the new area code.	Service Providers that publish directories
	After Permissive 7 and 10-Digit Dialing Begins	
7	Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
8	Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	Co-Chairs of industry committee
9	Update social media with information regarding overlay	All Service Providers
10	Update websites with information regarding overlay	All Service Providers
11	Issue second (Mandatory Dialing) press release	Commission and Service Providers that have the ability

Technical Milestones:

		Responsibility
1	Obtain industry test code from NANPA and activate the test number.	One Service Provider volunteer
2	Open the test code in carriers' network.	All Service Providers
3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	All Service Providers
4	Network ready for Permissive Dialing	All Service Providers
5	Create Permissive Dialing Industry Contact List	Co-Chairs of industry committee
	Permissive Dialing Begins	
6	Establish NPA Specific type of Trunks	All Service Providers (if needed)
7	Completion of 10-digit signaling transition between carriers' networks	All Service Providers
8	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	All Service Providers
9	Update on all speed calling, call	All Service Providers

	forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
10	Recorded announcements in Place and Tested	All Service Providers
	E911 Work Plan	
11	Confirm new ESN/NPD has been established for the new NPA	E911 Providers
12	Ensure SRDB table has new NPA built in	E911 Providers
13	Notify PSAPs, PSALI customers and County Coordinators (1st and 2nd Notification)	E911 Providers
14	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (if needed)
15	Update PSAP equipment	PSAPs
16	Trunk Orders Complete	All Service Providers (if needed)
17	Build E911 Network/Tandem Translations	911 Providers
18	Verify if all PSAP work has been completed	911 Providers
19	Activate E911 Network/Tandem Translations	911 Providers

The above are the typical milestones necessary for implementation of an all-services distributed overlay; however, these may need to be modified during the actual implementation.

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD
There were no statements for the record.

Cecilia reviewed the following schedule for the remaining activities until the FL 904 NPA petition is filed with the Commission.

FL 904 NPA Relief Planning Schedule
January 27 – Draft Minutes Posted via NNS
February 3 – Final Minutes Posted via NNS
February 3 – Post Draft Filing via NNS
February 10 – Draft Petition Review Meeting
February 24 – File Petition with Commission

MEETING MINUTES APPROVAL

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry no later than January 27, 2022. Any changes or corrections are to be submitted to Cecilia via email at cmccabe@nanpa.com no later than one week after the minutes are posted to the NANP Administratin System (NAS) on the NANPA website when the minutes will become final.

The meeting was adjourned

# # #

These minutes became final on February 2, 2022.

Attachment # 1

Florida 904 NPA
Initial Implementation Meeting via Web Conference
January 13, 2022
Participants

NAME	COMPANY
Sharon Poer	AT&T
Rita Schmitz	CenturyLink/Lumen
Matt Nolan	Charter
Kathy Rogers	DISH Wireless
Greg Fogleman	Florida Public Service Commission
Sakina Deas	Florida Public Service Commission
Paul Belote	Inteliquent
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Shaunna Forshee	T-Mobile
Allyson Blevins	Twilio
Dana Crandall	Verizon Wireless
Scott Terry	Windstream

Attachment #2

Florida
NXX Summary Data as of January 12, 2022

NPA	904	386	352		
Assigned NXXs	710	397	643		
Protected NXXs	0	0	0		
Reserved NXXs	0	0	0		
Unavailable NXXs	22	21	27	See Note	
Available NXXs	68	382	130		
Total	800	800	800		
Codes Assignment History					
2016	21	6	12		
2017	10	6	7		
2018	7	5	13		
2019	14	14	19		
2020	32	22	30		
2021	28	31	42		
2022	1*	0*	2*		

Based on Revised NPA forecasted exhaust projections issued on January 4, 2022

904 NPA projected exhaust 3Q2024

386 NPA projected exhaust 4Q2039

352 NPA projected exhaust 1Q2026

*As of January 12, 2022

Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).

Attachment #3

THOUSANDS-BLOCK STATISTICS			
ST/NPA:	**FL 904**	**FL 386**	**FL 352**
MEETING DATE:	**1/13/2022**	**1/13/2022**	**1/13/2022**
POOL START DATE (PSD)	**4/2/2001**	**7/16/2001**	**12/17/2002**
RATE CENTERS			
# Total	**19**	**33**	**48**
# Mandatory	**18**	**15**	**17**
# Mandatory-Single Service Providers (M*)	**0**	**0**	**0**
# Optional	**1**	**18**	**31**
# Excluded	**0**	**0**	**0**
BLOCKS ASSIGNED			
# Total	**382**	**311**	**566**
(For time period 01/01/21 -1/12/22)			
BLOCKS AVAILABLE			
#Total	**90**	**293**	**335**
(As of preparation date: 1/12/22)			
CODES ASSIGNED			
# Total	**29**	**31**	**44**
# for Pool Replenishment	**23**	**22**	**35**
# for Dedicated Customers	**1**	**0**	**0**
# for LRNs	**5**	**9**	**9**
(For time period 01/01/21 - 1/12/22)			
CODES FORECASTED			
# Total	**11**	**2**	**13**
# for Pool Replenishment and Dedicated Customers	**11**	**2**	**13**
# for LRNs	**0**	**0**	**0**
(For the next twelve months as of: 1/12/22)			

EXHIBIT B

December 16, 2021

To: All 904 NPA Code Holders and Interested Industry Members (Florida)

Subject: Florida 904 NPA Initial Planning Document Review

The North American Numbering Plan Administrator ("NANPA") is responsible for initiating area code relief in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented in accordance with the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061). The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2021 NRUF Report"), published by NANPA, indicated that the 904 NPA would exhaust during the fourth quarter of 2024 and relief planning is to begin in the fourth quarter of 2021.

Accordingly, on January 13, 2022, NANPA will convene an industry NPA relief planning meeting via web conference to develop a recommended relief plan for the 904 NPA. The objective of this meeting is to reach consensus among members of the Florida Telecommunications Industry on a single plan of relief for the 904 NPA. The resulting relief plan will be filed with the Florida Public Service Commission ("Commission") for their consideration. The industry-recognized consensus process developed by the Alliance for Telecommunications Industry Solutions ("ATIS") will be applied in the decision-making efforts. Additionally, some of the relief alternatives in this document impact the 386 and 352 NPAs so service providers operating in these NPAs are invited to attend this relief planning meeting.

Included with this meeting notice is the meeting agenda, consensus process, 904 NPA CO code summary and thousands-block statistics report, relief planning meeting aids, Service Provider CO code assignments by OCN, Rate centers in the 904 NPA, customer and technical milestone worksheet, and associated maps. Due to the fact that there are relief alternatives outlined in this notice that include the 386 and 352 NPAs, the thousands-block statistics, CO code Summaries, Service Provider CO code assignments by OCN, and rate center table are also included for these NPAs.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on January 13, 2022. This may be the only meeting of the industry before a decision is reached on a recommended relief plan that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Thursday, January 13, 2022
Time: 11:00 am, ET; 10:00 am CT; 9:00 am MT; 8:00 am PT

Join Zoom Meeting
https://somos.zoom.us/j/89896671930?pwd=N05YUkY5MUFsUU1xTkJ4V0orTFQzUT09

Meeting ID: 898 9667 1930
Password: 542493

One tap mobile
8778535257,,89896671930# US Toll-free
8884754499,,89896671930# US Toll-free

Dial by your location
877 853 5257 US Toll-free
888 475 4499 US Toll-free
Meeting ID: 898 9667 1930

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 904 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (925) 420-0130 or via email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Sakina Deas – Florida Public Service Commission Staff

FLORIDA 904 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE

January 13, 2022 - 11:00 AM (ET)

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review 904 NPA Background and History

Review 904, 386 and 352 NPA Status

Review Initial Planning Document and Proposed Alternatives

Review Relief Alternative Pros and Cons

Consensus on Relief Alternative

Consensus on Implementation Intervals

Consensus on Customer Education and Technical Milestones

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion. A participant may appeal the resolution of an Issue in the manner provided for in Section 13.

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 NANPA's responsibilities to 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.

Assumptions and Constraints

The development of these guidelines include the following assumptions and constraints:

2.1

These guidelines were developed by the INC to apply to geographic NPA relief planning.

2.2

Section 14 has been added to incorporate NANPA's responsibility for Toll Free Service relief planning.

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. It may not be possible to assign all 792 NXXs as CO codes for a variety of reasons.

2.4

The relief plan chosen will seek to minimize end user confusion while balancing multiple objectives including cost effectiveness, minimum customer impact, and long-lasting relief.

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 8-10 years**.** However, the ultimate decision as to which geographic area is assigned a new NPA in an NPA split is usually in the hands of local regulatory authorities instead of the industry. In addition, an extended permissive dialing period for certain specific NXX codes, e.g., wireless or NXX codes containing numbers utilized by alarm companies, especially where local number portability (LNP) and/or thousands-block number pooling have been implemented, shall be avoided.

2.6

The ATIS consensus process will be employed in selecting an industry relief recommendation.

2.7

NANPA will moderate industry relief planning meetings and is required to do so in a fair and impartial manner, ensuring that all participants have any opportunity to express their opinions.

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.

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 authority (e.g., state or country) has the ultimate authority to approve or reject a relief plan.

2.11

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

2.12

Once there is an approved relief plan, all code holders, block holders, and the Pooling Administrator (PA) in the exhausting NPA shall take the appropriate steps to facilitate the implementation of the plan.

2.13

These guidelines and all related documents and guidelines[1] referenced herein will be made available to all Affected Parties by the NANPA upon request.

2.14

Service Providers (SPs) and numbering resource administrators are responsible for managing numbering resources in accordance with these guidelines and the orders of applicable regulatory authorities. Both SPs and numbering resource administrators are subject to audits. Further information may be found in FCC 00-104 ¶62, FCC 00-429 ¶81-99, and 47 CFR §52.15(k).

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[1] ATIS-0300119, *Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG)*; ATIS-0300046, *Recommended Notification Procedures to Industry for Changes in Access Network Architecture*.

5.0 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

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 plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, implementation of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.

c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.

d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.

e) 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 8-10 years.

f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.[2]

g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.[3] Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the premise that all NXXs available for

[2] Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

[3] In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

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 10 years, shall be avoided.

5.1 Determine the Expected NPA Exhaust Period

Through the use of historical growth data as well as expected changes (e.g., pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results, should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six months prior to the earliest likely exhaust date.

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA will distribute the Initial Planning Document to the industry within four weeks of the declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more than eight weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is not reflective of the true need for relief.
- In cases where the NPA is in jeopardy and CO codes are rationed, two exhaust dates will be reported: (1) the exhaust date at jeopardy declaration, and (2) the exhaust date with controlled allocation.

5.2 Identify the Alternative Relief Methods Available

Within the affected NPA, the NANPA should next identify possible NPA relief alternatives and methods from among those identified in Section 6.

5.3 Define the Attributes of Each Alternative or Method

For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, and local dialing plans using 7-digits or 10-digits should be made at this point. Examples of attributes are shown in Appendix E.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning

The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to 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 IPD should be provided at least four weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.

5.5 Conduct Industry Meetings/Conference Calls 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. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration[4]. NANPA shall moderate 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 shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry consensus, subsequent meetings/conference calls shall be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

5.5.1 Modifications to Previous Industry Agreements

This process provides industry participants an opportunity under prescribed circumstances to reopen and possibly modify previous agreements reached by consensus. To be fair to all parties and cognizant of the time and effort required to reach industry consensus, the following procedures shall be used to request a reopening of a previous consensus agreement(s).

- At least two Affected Parties are required to request the reopening and review of a consensus agreement(s) achieved at a previous industry meeting. This excludes a previously agreed to industry NPA relief plan, regardless of whether or not that plan has been filed. The request by the parties for a reopening/review must be made in writing to the Director, North American Numbering Plan Administration.
- At least three Affected Parties are required to request the reopening of a previously agreed to industry NPA relief plan that has not been filed with the appropriate regulatory authority. The request by the parties for a reopening/review shall be made in writing to the Director, North American Numbering Plan Administration.
- NANPA shall request a reopening of previous consensus agreements after receiving regulatory approval when circumstances could potentially have a significant impact to the implementation plan.
- NANPA shall notify all Affected Parties at least two (2) weeks in advance that a special conference call has been scheduled. Attached to the notice will be the reasons for and description of the proposed changes. Every effort will be made to avoid conflicts with other industry meetings so that all parties may participate.
- At the beginning of the conference call, Affected Parties will consider whether the previous consensus agreement will be reopened for discussion. If consensus is reached to reopen the discussion, the call will proceed. Absent such a consensus, the conference call will be adjourned.

[4] Caveat: those on the bridge may NOT ask for comments to be repeated or for additional explanations to be given because they cannot see what's happening in the room. The use of a bridge must not slow down the meeting.

- Only issues related to the scheduled topic will be considered on this special conference call.
- Meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

5.6 Notify Appropriate Regulatory Authority

When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory authority the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.

5.6.1 Relief for An Existing Overlay

Where NPA relief is required for an existing overlay complex, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft filing shall include the state's existing overlay dialing plan.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within 6 weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.6.2 Relief For A Single NPA When An Overlay is the Only Viable Alternative

Where NPA relief is required for a single NPA area, 10-digit dialing has not been implemented, and NANPA has determined that only an overlay alternative will meet the guidelines, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filingrequesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft filing. In the notification, NANPA will include data (e.g., an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The three (3) week timeframe notification may be necessary to allow individual industry members to fully analyze the technical, educational, and operational impacts to their respective subscribers and networks in determining the timeframes needed for implementation.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief filing. The draft filing will include a recommendation for 10-digit dialing for local[5] calls (to either the home NPA (HNPA) and to foreign NPA(s) [FNPA]), and 1+10-digit dialing for toll cals (to either HNPA or FNPA), unless the state has an existing overlay dialing plan that is different. The recommended relief (i.e., mandatory dialing and the new NPA's inservice date) should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within 6 weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.6.3 Relief For A Single NPA When 10-Digit Dialing Has Been or Will Be Implemented

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing[6], then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft filing shall include the state's existing overlay dialing plan.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within 6 weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.7 Approval by Appropriate Regulatory Authority

When the regulator issues an order (or other written approval) for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.

5.8 Public Statements/Press Releases

Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

[5] As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

[6] For example, FCC 20-100, ¶53.

- factual information about the impending exhaust of the NPA
- and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some regulators may require input from the public to the planning process. If questions are directed to the NANPA, 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 that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating NPA boundaries and dialing procedures.

5.9 Industry NPA Relief Implementation Meeting

NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan. (NANPA, on its own initiative or using input from Service Providers, has the option to convene a face-to-face meeting if the chosen plan presents unusual implementation factors.) The meeting shall occur no more than 45 calendar days following the assignment of a new NPA. The agenda for the industry implementation meeting should include relevant dates, implementation milestones, customer education, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.

5.10 Planning Letter

NANPA shall post a Planning Letter to its website informing the public and the industry of pending NPA relief no more than three weeks after the initial implementation meeting. If regulatory approval of the implementation plan with interval dates is required, the Planning Letter will be published within 14 calendar days of regulatory approval. If an additional implementation meeting is required, the Planning Letter will be published within 3 weeks of the additional implementation meeting.

This Planning Letter should include a full disclosure of the old and new NPAs, the associated testing period, permissive dialing period, affected NXXs, rate centers, records conversion dates, the beginning date for mandatory dialing, and the effective date of the new NPA (See time line Appendix C). Also included should be a test number for routing verification of the new NPA, the date it will become available and the disconnect date. Other information that may be incorporated with this notification includes a map indicating NPA boundaries, dialing procedures and a NANPA contact name and telephone number. Service providers that are code and/or block holders within the affected NPA should provide to the NANPA their company's NPA Relief Project Coordinator's contact information for inclusion in the company contact section of the Planning Letter.

5.10.1 LERG™ Routing Guide Notice

The NPAs and the NXXs impacted by NPA relief should be published in the iconectiv® LERG Routing Guide at least six months in advance (See also Section 8).

5.10.2 Planning Letter Change Notice

Subsequent regulatory orders (or other written approvals) that change a relief order previously issued addressing NPA relief planning require NANPA to post a Planning Letter change notice to the NANPA

website within 14 calendar days of the regulatory order. If the subsequent regulatory order requires NANPA to meet with the Industry to obtain details to be included in the new Planning Letter, then only the notice of the industry meeting shall be distributed within 14 calendar days of the regulatory order, and then the new Planning Letter shall be posted to the NANPA website within 3 weeks of the industry meeting. The new Planning Letter shall contain as much detail as possible to notify the public and the industry of the changes, and normally includes information such as a new list of impacted NXXs affected by the change, changes to the permissive and/or mandatory dialing dates or the new NPA, changes to the effective and disconnect dates of test codes, a list of rate centers affected by the change, etc. The new Planning Letter change notice is also posted in order for TRA to update the affected records in BIRRDS.

If the regulatory authority suspends or rescinds implementation of a planned NPA, the NANPA will include in the Planning Letter a notice that rescinds the implementation and the information associated with the previously approved NPA relief plan because this information may change when the regulatory authority lifts the suspension. If the subsequent regulatory order requires NANPA to meet with the Industry to obtain details to be included in the Planning Letter, then only the notice of the industry meeting must be distributed within 14 calendar days within 3 weeks of the industry meeting.

NANPA will update the “Relief Status” of the NPA relief project on the NPA Relief Activity Status Report on the NANPA website from Active to Suspended, Rescinded, etc. based on the terminology used in the regulatory authority order. A brief synopsis from the Planning Letter will be included in the notes section of the NPA Relief Activity Status Report concerning the revised “Relief Status” of the NPA relief project.

Alternative Relief Methods

All of the currently identified code relief alternatives are described below, but depending on the particular NPA and the distribution of assigned NXXs within it, some alternatives may not be compliant with the criteria in Section 5.0 above (e.g., in an NPA with a high concentration of assigned NXXs in one or only a few rate centers, the overlay may be the only possible relief method). Possible impacts of these alternatives are found in Appendices B, E and G.

6.1 NPA Split Method

By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA.

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/realignment 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, and number changes are mandatory for customers assigned numbers from NXX codes that are moved to the adjacent NPA. This method applies to multi-NPA states or provinces only. Boundary realignments must follow rate center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Overlay Method7

An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs.[8] Some states require 1 + 10 digit local dialing and some require 10-digit local dialing and allow 1 + 10 digit local dialing at the SP's discretion.

The overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay allows the option to eliminate the permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an NPA overlay. They are listed below:

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be appropriate where 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 NXXs in that section would be assigned from the new NPA. As the NXXs allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available NXXs to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA.

6.3.2 Boundary Elimination Overlay

With a boundary elimination 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 elimination 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 a limitation of boundary realignment because it offers shorter-term relief.

6.3.3 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. 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.

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[7] The LNPA Working Group Best Practice 30 supports the all-services overlay as the preferred form of area code relief, and was endorsed by the North American Numbering Council (NANC) on September 18, 2013. See http://www.nanc-chair.org/docs/documents.html.

[8] 47 CFR §52.19 (c) (3) (ii).

6.3.4 Technology-specific or Service-Specific Overlay

These overlays occur when a new area code is introduced to serve the same geographic area as one or more existing area code(s) and numbering resources in the new area code overlay are assigned to a specific technology(ies) or service(s). State commissions may not implement a technology-specific or service-specific overlay without express authority from the FCC.[9] Such overlays are not feasible where local number portability and/or thousands-block pooling have been implemented.

A state commission seeking delegated authority from the FCC to implement a technology-specific or service-specific overlay should discuss why the numbering resource optimization benefits of the proposed overlay would be superior to implementation of an all-services overlay.[10]

6.4 Other Relief Methods

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 overlays, 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.

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Other Relief Planning Considerations

This section describes miscellaneous considerations that 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 which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Regulatory Involvement

Regulatory Involvement - Involvement of the appropriate regulatory authority staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

7.2 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 general, the relief implementation should be in place six months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three months before the existing NPA would exhaust under the highest growth projections.

[9] 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶67-94.

[10] See FCC 01-362 ¶ 81-94.

Annex B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- quantity of subscribers who will have to undergo number changes
- impact on customer premise equipment (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 such as reprinting of stationery, business cards, advertising, and CPE and other database reprogramming.

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support 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
- LNP compliance impacts

Industry Concerns

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

Annex E

General Attributes of the Most Common Relief Alternatives

Geographic Splits	All-Services Overlays
• Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area.	• With an overlay there will be more than one area code in a geographic area.
• Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.	• An overlay will not require existing customers to change their area code.
• Geographic splits permit 7-digit dialing within an area code.	• An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
• Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code.	• There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.
• Future splits will reduce the geographic size of the area code.	• An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

Relief Planning Meeting Aid

Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

This meeting aid is a compilation of industry developed Pros and Cons and is prepared to assist the participants in evaluating the attributes of the relief alternatives being considered.

Overlay Pros and Cons:

Pros:

Alternative #					
					1 All existing customers would retain the ___ area code and would not have to change their telephone numbers.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
					3 Easier education process
					4 Less customer confusion and easier education process
					5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
					6 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
					7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					8 Customers do not have to update personal printed material such as checks and websites, etc.
					9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth
					10 No need for synchronization of old and new NPAs in NPAC databases
					11 Minimizes call routing issues, especially with ported numbers
					12 Easier for service providers to implement from a translations, billing and service order system perspective
					13 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
					14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
					15 Does not split cities or counties into different area codes.
					16 Keeps communities of interest in tact.
					17 No impact on some wireless carriers that have to reprogram handsets manually
					18 No technical impacts to number portability, text messaging or multimedia messaging

Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

					19 An all services overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice.
					20 An all services overlay would have a consistent local dialing pattern, as opposed to a concentrated overlay that could have two different types of local dialing in the __ NPA.
					21 Helps move customers toward nationwide 10-digit dialing.

Overlay Pros and Cons:

Cons:

Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the ___ NPA and the new NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
					4 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
					5 Loss of geographic identity with an overlay.
					6 Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

Boundary Elimination Overlay Pros and Cons:

Pros:

Alternative #					
					1 Eliminates need to open new NPA
					2 Does not require customers to change their area code.
					3 It is a more efficient use of resources.

Boundary Elimination Overlay Pros and Cons:

Cons:

Alternative #					
					1 Boundary elimination alternatives have shorter lives than the all-services overlay
					2 Impacts a larger quantity of customers than the all-services overlay
					3 Requires customers in either ___ or ___ NPAs to dial 10 digits where otherwise they wouldn't be subjected to NPA Relief for another __ years.
					4 Complex customer education process, which would likely lead to increased customer confusion.

NPA Split Pros and Cons

Pros:

Alternative #					
					1 Customers retain seven-digit dialing for all calls within the same NPA.
					2 Maintains seven digit dialing for local calls within the same NPA
					3 Approximately ½ of customers would experience no change if they keep the XXX NPA
					4 Projected lives are balanced
					5 The projected lives are slightly more balanced than alternative # _.
					6 The projected lives are more balanced
					7 This alternative allows _____ to maintain operations on one side of the split line.

					8 _____ operating territory is kept in tact
					9 Retains the geographic identity with one area code.
					10 Keeps the cities on both sides of the split lines intact.

NPA Split Pros and Cons:

Cons:

Alternative #					
					1 Splits _____operating territory between two NPAs
					2 _____EAS calling is heavily disrupted
					3 Projected lives are imbalanced, _ years difference, least balanced of the split alternatives, could become more imbalanced if demand changes in future years
					4 Requires approximately ½ of ___ NPA customers to change their area code, thus creating winners and losers.
					5 Requires NPA change for approximately ½ of ___ NPA customers
					6 Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
					7 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
					8 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
					9 All ___ NPA customers previously went through a split _ years ago and half will have to change again
					10 Difficult PSC/PUC decision on which side retains the old NPA.
					11 Longer time period needed for service providers to implement this type of relief.
					12 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
					13 More complicated and costly to implement for service providers in their billing, translations and database systems.
					14 Splits affect alarm systems and E-911 databases.
					15 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.

					16	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
					17	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
					18	Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
					19	Split requires significant challenges to service provider's operational support systems and network elements.
					20	Splits cause customer confusion with caller ID during implementation.
					21	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					22	Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					23	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					24	This split disrupts the SP's host-remote switch arrangement.
					25	Splits require the 800/SMS database to be updated.
					26	Splits reduce the geographic area served by one area code.
					27	Splits the city(s), counties or legislative districts into different area codes.
					28	Splits communities of interest.
					29	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

Relief Planning Meeting Aid

Dialing Plans and Implementation Intervals

This meeting aid has examples of industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	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 digit permissible at each service provider's discretion

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within existing NPA can be dialed using 7 or 10 digits)* *Mandatory* dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period *(Effective date for codes from the new NPA)* *	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

**CO codes in the new NPA will not be assigned until all available codes in the existing NPA have been exhausted.*

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	8 Months
Earliest Activation of CO Codes in the new NPA*	1 Month after the completion of customer education and network preparation period No later than ___(insert QTR)

**CO codes in the new NPA will not be assigned until all available codes in the Existing NPA have been exhausted.*

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period Ends	9 months after the Implementation Start Date selected by the Industry
Earliest Activation of CO Codes in the new NPA*	9 months after the Implementation Start Date selected by the Industry No later than ___(insert QTR)

**CO codes in the new NPA will not be assigned until all available codes in the existing NPA have been exhausted.*

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	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)

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period *(Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable)* Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation *(Effective date for codes from the new NPA)*	End of Recording Period
Total Implementation Interval	15 months

Relief Planning Meeting Aid
Customer Education and Technical Milestones

This meeting aid is a compilation of industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

Customer Milestones:

			Responsibility
		1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding additional overlay	
		5 Update websites with information regarding additional overlay	
		6 Develop language for use in Directories to alert the consumers of 10-digit dialing and the new area code.	
		After Permissive 7 and 10-Digit Dialing Begins	
		7 Issue second customer notification(e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	
		9 Update social media with information regarding additional overlay	
		10 Update websites with information regarding additional overlay	
		11 Issue second (Mandatory) press release	

Technical Milestones:

				Responsibility
		1	Obtain industry test code from NANPA and activate the test number.	
		2	Open the test code in carriers' network.	
		3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	
		4	Ensure Highway boxes are programmed with 10-digit dialing.	
		5	Network ready for Permissive Dialing	
		6	Create Permissive Dialing Industry Contact List	
			Permissive Dialing Begins	
		7	Establish NPA Specific type of Trunks	
		8	Completion of 10-digit signaling transition between carriers' networks	
		9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	
		10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
		11	Recorded announcements in Place and Tested	
			E911 Work Plan	
		12	Confirm new ESN/NPD has been established for the new NPA	
		13	Ensure SRDB table has new NPA built in	
		14	Notify PSAPs, PSALI customers and County Coordinators (1st and 2nd Notification)	
		15	Review and Submit CLEC Trunk Order Requests to local provider if needed	
		16	Update PSAP equipment	

		17 Trunk Orders Complete	
		18 Build E911 Network/Tandem Translations	
		19 Verify if all PSAP work has been completed	
		20 Activate E911 Network/Tandem Translations	

Initial Planning Document

For

Relief of Florida 904 NPA

January 13, 2022

North American Numbering Plan Administrator

Cecilia McCabe
NPA Relief Planner

904 NPA Background Information

Relief Planning Background and Assumptions:
The 904 NPA has been in service since July 11, 1965. In 2001, the 904 NPA was split, creating the non-contiguous 386 NPA. The 904 NPA serves Northeast Florida and includes all or most of Nassau, Duval, Baker, Bradford, Clay, St. Johns and Union Counties. C ities in the 904 NPA include but are not limited to Jacksonville, Jacksonville Beach, Middleburg, Yulee, Fernandina Beach, Orange Park and other smaller communities. The 904 NPA is bordered on the north by the Georgia 912 NPA, to the east by the Atlantic Ocean and to the south by the 386 NPA and west by the 386 and 352 NPAs.

CO Code Summary:
As of December 13, 2021, the 904 NPA has 708 codes assigned, 70 codes available for assignment and 22 Un-Assignable codes. There are 60 service provider OCNs that are code holders in the 904 NPA.

As of December 13, 2021, the 386 NPA has 395 codes assigned, 384 codes available for assignment and 21 Un-Assignable codes. There are 51 service provider OCNs that are code holders in the 904 NPA and 4 OCNs that are only thousand-block holders in the NPA.

As of December 13, 2021, the 352 NPA has 637 codes assigned, 133 codes available for assignment and 30 Un-Assignable codes. There are 55 service provider OCNs that are code holders in the 904 NPA.

Exhaust Forecast:
The October 2021 Numbering Resource Utilization/Forecast ("NRUF") and NPA Exhaust Analysis ("October 2021 NRUF Report"), published by NANPA, indicates that the 904 NPA will exhaust during the fourth quarter of 2024, the 386 will exhaust in the second quarter of 2041 and the 352 NPA will exhaust in the third quarter of 2026. Relief planning in the 904 NPA is to start in the fourth quarter of 2021.

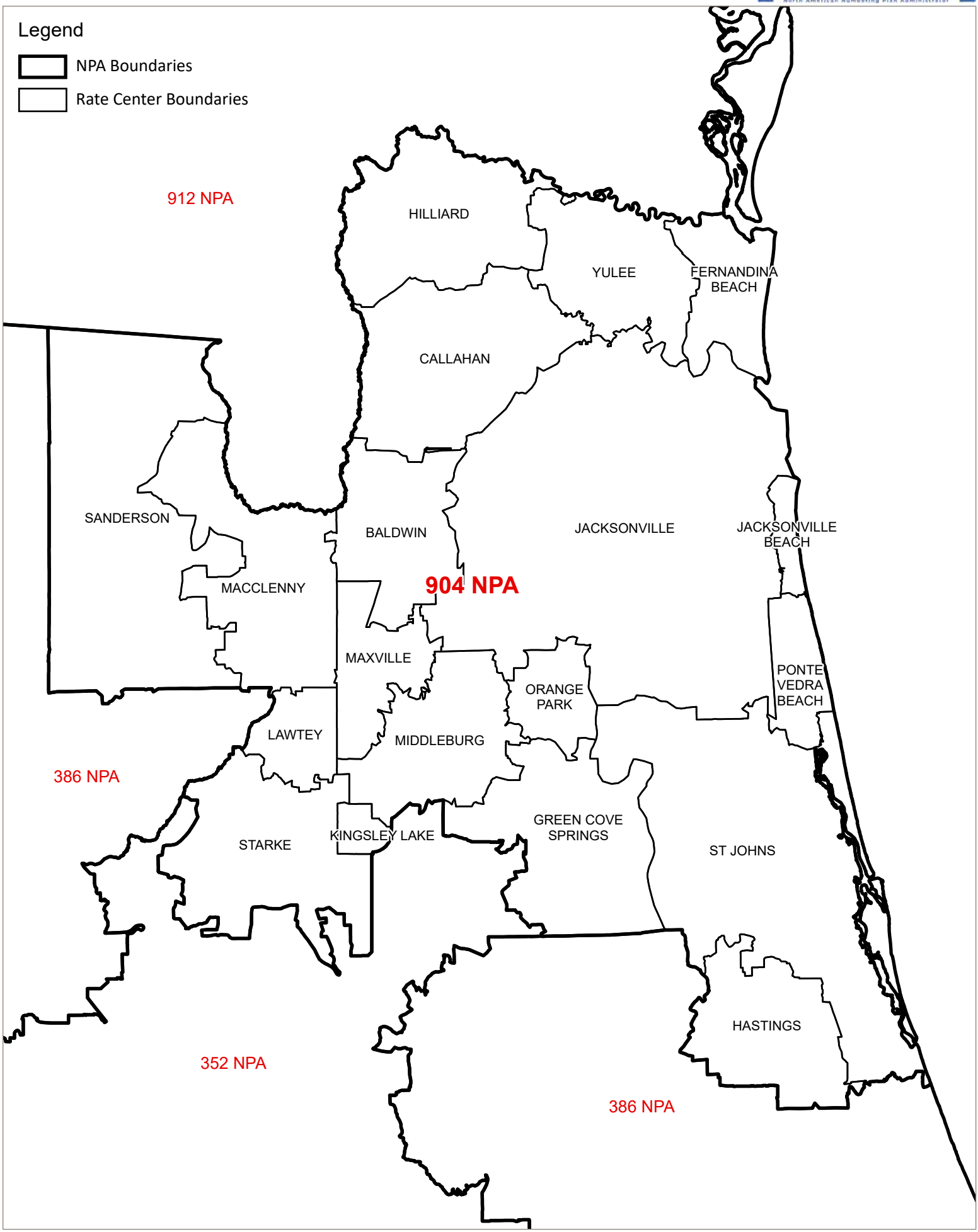
NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 904 NPA

PROJECTED EXHAUST DATE…….....4Q2024
ANNUALIZED CODE DEMAND PROJECTION…….....23
MONTHLY CO CODE DEMAND PROJECTION…….....1.9
NXX Assignment Data ……...December 2021

CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll Call	Home NPA (HNPA)	1+10 digits (1+ NPA-NXX-XXXX)
	Foreign NPA (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)

Florida 904 NPA Rate Center Map



rev: 2021-10-27

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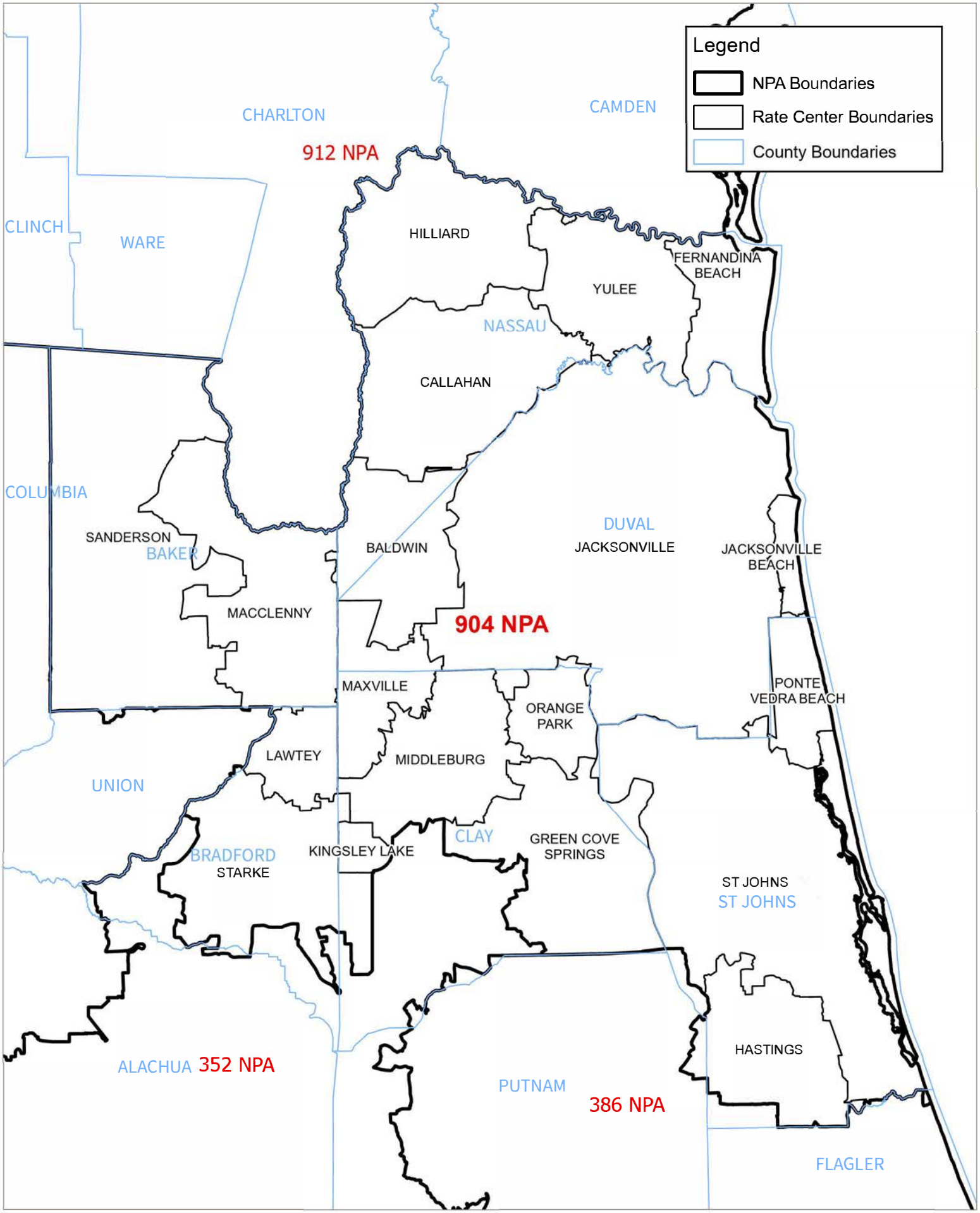
Florida 904 NPA Rate Center and County Map



rev: 2021-12-13

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Florida
NXX Summary Data as of December 13, 2021

NPA	904	386	352		
Assigned NXXs	708	395	637		
Protected NXXs	0	0	0		
Reserved NXXs	0	0	0		
Unavailable NXXs	22	21	30	See Note	
Available NXXs	70	384	133		
Total	800	800	800		
Codes Assignment History					
2016	21	6	12		
2017	10	6	7		
2018	7	5	13		
2019	14	14	19		
2020	32	22	30		
2021	27*	29*	38*		
Based on October 2021 NRUF					
904 NPA projected exhaust 4Q2024					
386 NPA projected exhaust 2Q2041					
352 NPA projected exhaust 3Q2026					
*As of December 13, 2021					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).					

THOUSANDS-BLOCK STATISTICS			
ST/NPA:	**FL 904**	**FL 386**	**FL 352**
MEETING DATE:	**1/13/2022**	**1/13/2022**	**1/13/2022**
POOL START DATE (PSD)	**4/2/2001**	**4/2/2001**	**4/2/2001**
RATE CENTERS			
# Total	**19**	**33**	**48**
# Mandatory	**18**	**15**	**17**
# Mandatory-Single Service Providers (M*)	**0**	**0**	**0**
# Optional	**1**	**18**	**31**
# Excluded	**0**	**0**	**0**
BLOCKS ASSIGNED			
# Total	**359**	**292**	**512**
(For time period 01/01/21 -12/13/21)			
BLOCKS AVAILABLE			
#Total	**82**	**277**	**287**
(As of preparation date: 12/13/21)			
CODES ASSIGNED			
# Total	**27**	**29**	**38**
# for Pool Replenishment	**21**	**22**	**30**
# for Dedicated Customers	**1**	**0**	**0**
# for LRNs	**5**	**7**	**8**
(For time period 01/01/21 - 12/13/21)			
CODES FORECASTED			
# Total	**12**	**3**	**16**
# for Pool Replenishment and Dedicated Customers	**12**	**2**	**15**
# for LRNs	**0**	**1**	**1**
(For the next twelve months as of: 12/13/21)			

FL 904 NPA Code Holder List

Company	OCN	CountOfNXX
1ST POINT COMMUNICATIONS, LLC	489J	6
ABC PAGING CITY BEEPERS, INC.	6548	3
AIRUS, INC. - FL	484H	2
ALLSAFE SECURITY SERVICE, INC. DBA ALLSAFE PAGING	6824	3
AMERICAN MESSAGING SERVICES, LLC	9748	11
AT&T - LOCAL	7421	5
AT&T CORP.	516C	7
BANDWIDTH.COM CLEC, LLC - FL	982E	11
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	215
BRIGHTLINK COMMUNICATIONS, LLC	478J	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
BUSINESS TELECOM, INC. DBA BTI - FL	8689	3
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	48
CENTURYLINK COMMUNICATIONS LLC	7575	1
COMCAST PHONE OF FLORIDA, LLC - FL	7562	21
COMMIO, LLC	939H	1
CORETEL FLORIDA, INC. - FL	481F	1
CSC WIRELESS, LLC	425J	1
DELTACOM, INC. - FL	4616	8
EMBARQ FLORIDA, INC. (CENTRAL) DBA CENTURYLINK	0340	5
EXIANT COMMUNICATIONS LLC	114J	1
FRACTEL, LLC	965H	11
FUSION CLOUD SERVICES, LLC	018A	2
FUSION CLOUD SERVICES, LLC	206A	1
HARGRAY OF FLORIDA, INC. - FL	447J	1
HD CARRIER LLC	321J	1
INTRADO COMMUNICATIONS, LLC	813C	1
IP HORIZON LLC	515J	4
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	26
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	8
LOCAL ACCESS LLC - FL	965G	1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	5
METROPCS NETWORKS, LLC	899D	1
METROPCS, INC.	5562	13
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	66
NORTHEAST FLORIDA TEL. CO., INC.	0335	3
ONVOY SPECTRUM, LLC	624H	3

FL 904 NPA Code Holder List

ONVOY, LLC - FL	937C	23
PAGER ONE OF FLORIDA - FL	6426	1
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	1
POWERTEL JACKSONVILLE LICENSES, INC.	7472	43
RADIANTIQ LLC	566J	6
RCLEC, INC.	156J	1
SIMWOOD, INC.	600J	1
SKYE TELECOM LLC DBA SKYETEL	622J	1
SPRINT SPECTRUM, L.P.	6664	53
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	12
TELNYX LLC	073H	3
TERRA NOVA TELECOM, INC. - FL	382G	5
TON80 COMMUNICATIONS, LLC	516J	1
TWILIO INTERNATIONAL, INC.	506J	1
US LEC OF FLORIDA, INC.	8692	12
USA MOBILITY WIRELESS, INC.	6630	11
VONAGE AMERICA LLC	197D	3
WAVENATION, LLC	700J	1
WINDSTREAM FLORIDA, INC.	0336	7
WINDSTREAM NUVOX, INC.	8660	7
WINDSTREAM NUVOX, INC. - FL	4085	8
XO FLORIDA, INC.	6100	4
YMAX COMMUNICATIONS CORP. - FL	594D	1

FL 386 NPA Code Holder List

Company	OCN	CountOfNXX
1ST POINT COMMUNICATIONS, LLC	489J	1
AMERICAN MESSAGING SERVICES, LLC	9748	2
AT&T - LOCAL	7421	6
AT&T CORP.	516C	5
BAKER'S ELECTRONICS & COMM., INC.	6617	1
BANDWIDTH.COM CLEC, LLC - FL	982E	2
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	78
BRIGHT HOUSE NTWS INFORMATION SVCS (FLORIDA) - FL	927D	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	25
CENTURYLINK COMMUNICATIONS, LLC	508J	2
COMCAST IP PHONE, LLC	318J	1
COMCAST PHONE OF FLORIDA, LLC - FL	7562	3
COMMIO, LLC	939H	1
CORETEL FLORIDA, INC. - FL	481F	1
CSC WIRELESS, LLC	425J	1
DAYTONA TELEPHONE COMPANY	4825	3
DELTACOM, INC. - FL	4616	7
EMBARQ FLORIDA, INC. DBA CENTURYLINK	0341	9
FRACTEL, LLC	965H	23
FUSION CLOUD SERVICES, LLC	7011	1
HARGRAY OF FLORIDA, INC. - FL	447J	1
HD CARRIER LLC	321J	1
IP HORIZON LLC	515J	1
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	21
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	5
MCI WORLDCOM COMMUNICATIONS, INC. - FL	7448	1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	2
METROPCS, INC.	5562	7
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	34
OMNIPOINT MIAMI E LICENSE, LLC	6889	6
ONVOY SPECTRUM, LLC	624H	2
ONVOY, LLC - FL	937C	20
ORLANDO TELEPHONE COMPANY DBA SUMMIT BROADBAND	7857	1
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	3
POWERTEL JACKSONVILLE LICENSES, INC.	7472	6
RADIANTIQ LLC	566J	2

FL 386 NPA Code Holder List

SKYE TELECOM LLC DBA SKYETEL	622J	2
SPRINT SPECTRUM, L.P.	6664	30
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	5
TELNYX LLC	073H	6
TERRA NOVA TELECOM, INC. - FL	382G	9
TON80 COMMUNICATIONS, LLC	516J	1
TWILIO INTERNATIONAL, INC.	506J	1
US LEC OF FLORIDA, INC.	8692	6
USA MOBILITY WIRELESS, INC.	6630	4
VONAGE AMERICA LLC	197D	1
WINDSTREAM FLORIDA, INC.	0336	34
WINDSTREAM NUVOX, INC.	8660	3
WINDSTREAM NUVOX, INC. - FL	4085	3
YMAX COMMUNICATIONS CORP. - FL	594D	3

Block holders with No CO Codes Assigned

Company	OCN
FUSION CLOUD SERVICES, LLC	206A
CENTURYLINK COMMUNICATIONS LLC	7575
BUSINESS TELECOM, INC. DBA BTI - FL	8689
LOCAL ACCESS LLC - FL	965G

FL 352 NPA Code Holder List

Company	OCN	CountOfNXX
AERIAL COMMUNICATIONS, INC.	6701	16
AMERICAN MESSAGING SERVICES, LLC	6483	6
AMERICAN MESSAGING SERVICES, LLC	6906	3
AMERICAN MESSAGING SERVICES, LLC	9748	4
AT&T - LOCAL	7421	8
AT&T CORP.	516C	4
BAKER'S ELECTRONICS & COMM., INC.	6617	1
BANDWIDTH.COM CLEC, LLC - FL	982E	10
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	71
BRIGHT HOUSE NTWS INFORMATION SVCS (FLORIDA) - FL	927D	8
BRIGHTLINK COMMUNICATIONS, LLC	478J	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	67
CENTURYLINK COMMUNICATIONS, LLC	508J	8
COMCAST IP PHONE, LLC	318J	7
COMMIO, LLC	939H	1
CSC WIRELESS, LLC	425J	1
DELTACOM, INC. - FL	4616	33
EMBARQ FLORIDA, INC. DBA CENTURYLINK	0341	101
EXIANT COMMUNICATIONS LLC	114J	1
FRACTEL, LLC	965H	12
FUSION CLOUD SERVICES, LLC	018A	2
GAINESVILLE REGIONAL UTILITIES DBA GRU COMM SVCS	8848	1
INTRADO COMMUNICATIONS, LLC	813C	1
IP HORIZON LLC	515J	3
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	27
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	3
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	8
METROPCS NETWORKS, LLC	899D	4
METROPCS, INC.	5562	7
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	56
ONVOY SPECTRUM, LLC	624H	9
ONVOY, LLC - FL	937C	25
ORLANDO TELEPHONE COMPANY DBA SUMMIT BROADBAND	7857	2
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	1
PORTA-PHONE DIV OF JOHN H. PHIPPS DBA AM MESG SVC	6771	1

FL 352 NPA Code Holder List

POWERTEL JACKSONVILLE LICENSES, INC.	7472	3
RADIANTIQ LLC	566J	10
SKYE TELECOM LLC DBA SKYETEL	622J	2
SPRINT SPECTRUM, L.P.	6664	56
STRATUS NETWORKS	495J	1
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	12
TELNYX LLC	073H	2
TERRA NOVA TELECOM, INC. - FL	382G	3
TON80 COMMUNICATIONS, LLC	516J	1
TWILIO INTERNATIONAL, INC.	506J	1
US LEC OF FLORIDA, INC.	8692	8
USA MOBILITY WIRELESS, INC.	6630	3
VOIP INNOVATIONS, LLC	597F	1
VONAGE AMERICA LLC	197D	2
WAVENATION, LLC	700J	1
WINDSTREAM FLORIDA, INC.	0336	12
WINDSTREAM NUVOX, INC.	8660	3
WINDSTREAM NUVOX, INC. - FL	4085	1
YMAX COMMUNICATIONS CORP. - FL	594D	1

FL 904 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
904	BALDWIN	BALDWIN
904	CALLAHAN	CALLAHAN
904	FERNADNBCH	FERNANDINA BEACH
904	GREENCVSPG	GREEN COVE SPRINGS
904	HASTINGS	HASTINGS
904	HILLIARD	HILLIARD
904	JACKSOLBCH	JACKSONVILLE BEACH
904	JACKSONVL	JACKSONVILLE
904	KINGSLEYLK	KINGSLEY LAKE
904	LAWTEY	LAWTEY
904	MACCLENNY	MACCLENNY
904	MAXVILLE	MAXVILLE
904	MIDDLEBURG	MIDDLEBURG
904	ORANGEPARK	ORANGE PARK
904	PNTVDRABCH	PONTE VEDRA BEACH
904	SANDERSON	SANDERSON
904	ST JOHNS	ST JOHNS
904	STARKE	STARKE
904	YULEE	YULEE

FL 386 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
386	ALACHUA	ALACHUA
386	BRANFORD	BRANFORD
386	BUNNELL	BUNNELL
386	CRESCENTCY	CRESCENT CITY
386	DAYTONABCH	DAYTONA BEACH
386	DEBARY	DEBARY
386	DELAND	DELAND
386	DELEON SPG	DE LEON SPRINGS
386	DOWLING PK	DOWLING PARK
386	FLAGLERBCH	FLAGLER BEACH
386	FLORAHOME	FLORAHOME
386	FLSHSBYRNH	FLORIDA SHERIFFS BOYS RANCH
386	FORT WHITE	FORT WHITE
386	HIGH SPG	HIGH SPRINGS
386	INTERLACHN	INTERLACHEN
386	JASPER	JASPER
386	JENNINGS	JENNINGS
386	LAKE CITY	LAKE CITY
386	LAKEBUTLER	LAKE BUTLER
386	LIVE OAK	LIVE OAK
386	LURAVILLE	LURAVILLE
386	MAYO	MAYO
386	NWSMYRNBCH	NEW SMYRNA BEACH
386	OAK HILL	OAK HILL
386	ORANGECITY	ORANGE CITY
386	PALATKA	PALATKA
386	PALM COAST	PALM COAST
386	PIERSON	PIERSON

NPA	Abbreviated Rate Center	Rate Center Full Name
386	POMONAPARK	POMONA PARK
386	RAIFORD	RAIFORD
386	WELAKA	WELAKA
386	WELLBORN	WELLBORN
386	WHITE SPG	WHITE SPRINGS

FL 352 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
352	ARCHER	ARCHER
352	ASTOR	ASTOR
352	BELLEVIEW	BELLEVIEW
352	BEVERLYHLS	BEVERLY HILLS
352	BRONSON	BRONSON
352	BROOKER	BROOKER
352	BROOKSVL	BROOKSVILLE
352	BUSHNELL	BUSHNELL
352	CEDAR KEYS	CEDAR KEYS
352	CHIEFLAND	CHIEFLAND
352	CITRA	CITRA
352	CLERMONT	CLERMONT
352	CROSS CITY	CROSS CITY
352	CRYSTALRIV	CRYSTAL RIVER
352	DADE CITY	DADE CITY
352	DUNNELLON	DUNNELLON
352	EUSTIS	EUSTIS
352	FOREST	FOREST
352	GAINESVL	GAINESVILLE
352	GROVELAND	GROVELAND
352	HAWTHORNE	HAWTHORNE
352	HOWEYINHLS	HOWEY IN THE HILLS
352	INVERNESS	INVERNESS
352	KEYSTN HTS	KEYSTONE HEIGHTS
352	LADY LAKE	LADY LAKE
352	LEESBURG	LEESBURG
352	MCINTOSH	MCINTOSH
352	MELROSE	MELROSE

NPA	Abbreviated Rate Center	Rate Center Full Name
352	MICANOPY	MICANOPY
352	MOUNT DORA	MOUNT DORA
352	NEWBERRY	NEWBERRY
352	OCALA	OCALA
352	OCKLAWAHA	OCKLAWAHA
352	OLD TOWN	OLD TOWN
352	ORANGE SPG	ORANGE SPRINGS
352	SALT SPG	SALT SPRINGS
352	SANANTONIO	SAN ANTONIO
352	SLRSPGSHRS	SILVER SPRINGS SHORES
352	TAVARES	TAVARES
352	TRENTON	TRENTON
352	TRILACOCHE	TRILLACOOCHEE
352	UMATILLA	UMATILLA
352	WALDO	WALDO
352	WEEKICHSPG	WEEKIWACHEE SPRINGS
352	WEIRSDALE	WEIRSDALE
352	WILDWOOD	WILDWOOD
352	WILLISTON	WILLISTON
352	YANKEETOWN	YANKEETOWN

904 NPA - RELIEF ALTERNATIVES

FLORIDA

Numbering Plan Area Born on Date: 1965

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE…….……..……..… October 2021
PROJECTED EXHAUST DATE……...4Q2024
ANNUALIZED CODE DEMAND PROJECTION……...23
MONTHLY CO CODE DEMAND PROJECTION……...1.9
NXX Assignment data ……December 2021

CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA)	7 digits (NXX-XXXX)
Local Call	Foreign NPA (FNPA)	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)

NPA RELIEF ALTERNATIVES

OVERLAY ALTERNATIVE

ALTERNATIVE #1 - ALL SERVICES DISTRIBUTED OVERLAY

The new NPA would be assigned to the same geographic area occupied by the existing 904 NPA. Customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. CO codes in the new NPA will be assigned upon request with the effective date of the new area code once all CO codes in the 904 NPA overlay have been exhausted. At exhaust of the 904 NPA, all future code assignments will be made in the new NPA. The projected life would be:

Total CO Codes 904 NPA= 708
Total Rate Centers = 19
Area Code Life in Years = 29 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 904 NPA and 386 NPA codes would be eliminated and the 904 and 386 NPAs would be assigned to the same geographic areas occupied by the existing 904 and 386 NPAs. The 904 NPA and 386 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available central office codes in the 386 NPA will be assigned upon request in the 904 NPA area with the effective date of the new area code boundary and available 904 NPA central office codes could be assigned upon request in the 386 NPA area. The 386 NPA has 33 rate centers and the projected exhaust date is 2Q2041. Eliminating the boundary between the 904 NPA and 386 NPA would have a combined life of 9 years and would save one NPA. This relief option would eliminate the non-contiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. The projected life would be:

904 NPA	**386 NPA**
Total CO Codes = 708	Total CO Codes = 395
Total Rate Centers =19	Total Rate Centers = 33

Combined Area Code Life in Years = 9 years

ALTERNATIVE #3 - BOUNDARY ELIMINATION OVERLAY WITH ALL SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904 NPA and 386 NPA area would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 904 and 386 NPAs with the effective date of the new area code boundary. The 904 NPA and 386 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available central office codes in the 386 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available 904 NPA CO codes could be assigned upon request in the 386 NPA. At exhaust of the 904 and 386 NPAs all future code assignments will be made from the new overlay NPA. Eliminating the boundary between the 904 and 386 NPAs and adding an all-services distributed overlay over both geographic areas would have a combined life of 26 years. This relief option would eliminate the non-contiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. The projected life would be:

904 NPA	**386 NPA**
Total CO Codes = 708	Total CO Codes = 395
Total Rate Centers =19	Total Rate Centers = 33

Combined Area Code Life in Years = 26 years

ALTERNATIVE #4 - BOUNDARY ELIMINATION OVERLAY WITH ALL SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904 NPA, 386 NPA and 352 NPA area would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 904, 386 and 352 NPAs with the effective date of the new area code boundary. The 904 NPA, 386 NPA and 352 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available CO codes in the 386 and 352 NPAs will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available 904 NPA CO codes could be assigned upon request in the 386 and 352 NPAs. The 352 NPA has 48 rate centers and the projected exhaust date is 3Q2026. Eliminating the boundary between the 904, 386 and 352 NPAs and adding an all-services distributed overlay over all three geographic areas would have a combined life of 17 years. This relief option would eliminate the non-contiguous boundary of the 386 NPA and reunite the 904 and 386 NPAs that were previously part of an NPA split that occurred in 2001. The projected life would be:

904 NPA	**386 NPA**	**352 NPA**
Total CO Codes = 708	Total CO Codes = 395	Total CO Codes = 637
Total Rate Centers =19	Total Rate Centers = 33	Total Rate Centers = 48

Combined Area Code Life in Years = 17 years

ALTERNATIVE #5 - BOUNDARY ELIMINATION OVERLAY WITH ALL SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 904 NPA and 352 NPA area would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 904 and 352 NPAs with the effective date of the new area code boundary. The 904 NPA and 352 NPA customers would retain their current telephone numbers, however, 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Available central office codes in the 352 NPA will be assigned upon request in the 904 NPA with the effective date of the new area code boundary and available 904 NPA CO codes could be assigned upon request in the 352 NPA. Eliminating the boundary between the 904 and 352 NPAs and adding an all-services distributed overlay over both geographic areas would have a combined life of 17 years. The projected life would be:

904 NPA	**352 NPA**
Total CO Codes = 708	Total CO Codes = 637
Total Rate Centers =19	Total Rate Centers = 48

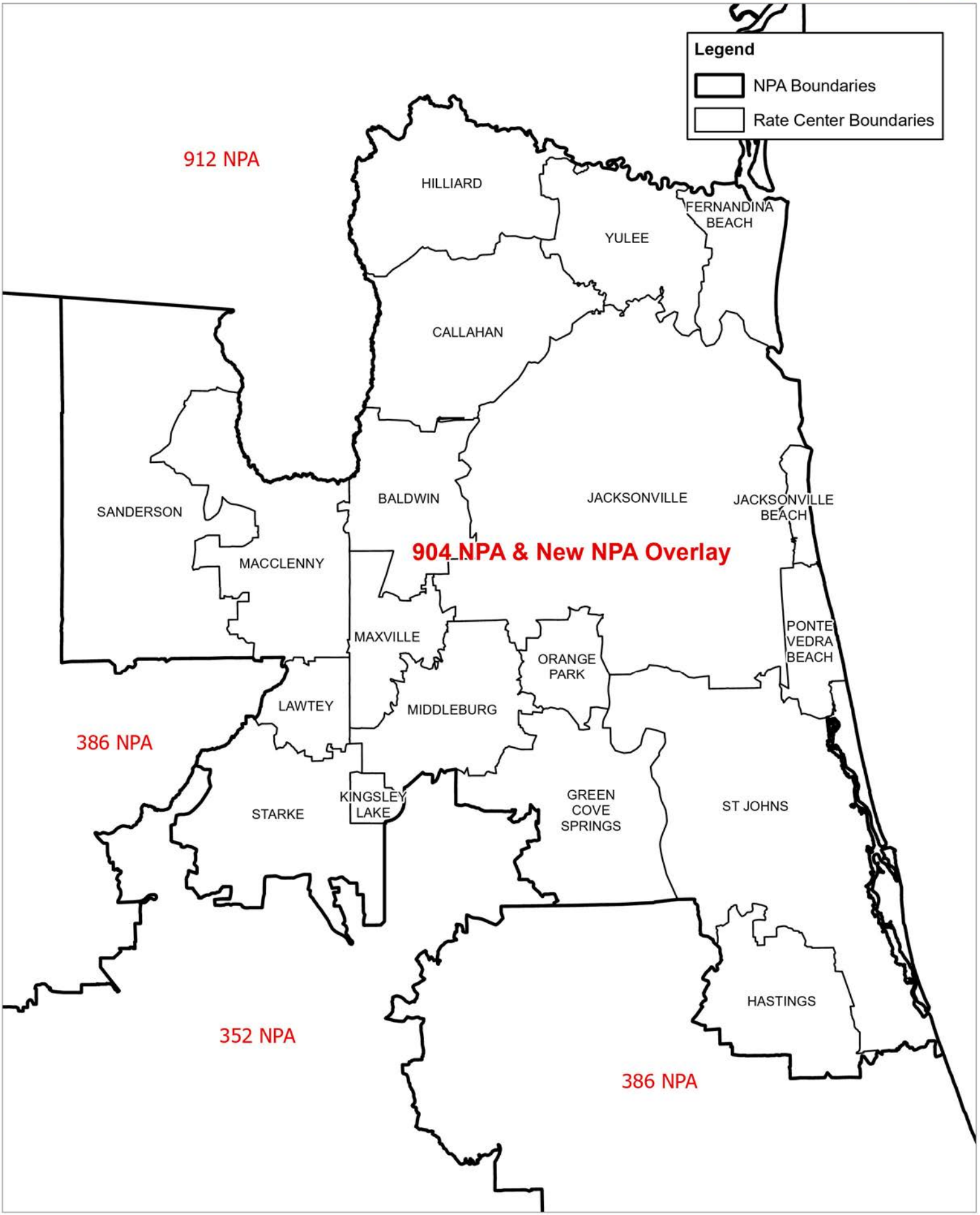
Combined Area Code Life in Years = 17 years

ALTERNATIVE #6 – GEOGRAPHIC SPLIT

The 904 NPA would be split into two geographic areas and a new NPA code would be assigned to one of the areas formed by the split. Ten-digit local dialing would be required between the two NPAs. Within an NPA, seven-digit local dialing would be permitted. The proposed split boundary would separate the Jacksonville rate center to one side of the split boundary line or Area B and the remaining 18 rate centers would be Area A of the split boundary line. No recommendation is made for which side of the split line would receive the new NPA. The projected life would be:

Area A	**Area B**
Total CO Codes = 251	Total CO Codes = 457
Total Rate Centers =18	Total Rate Centers 1 (Jacksonville rate Center)
Area code life in years = 34	Area code life in years = 26

Alternative #1 – All Services Overlay



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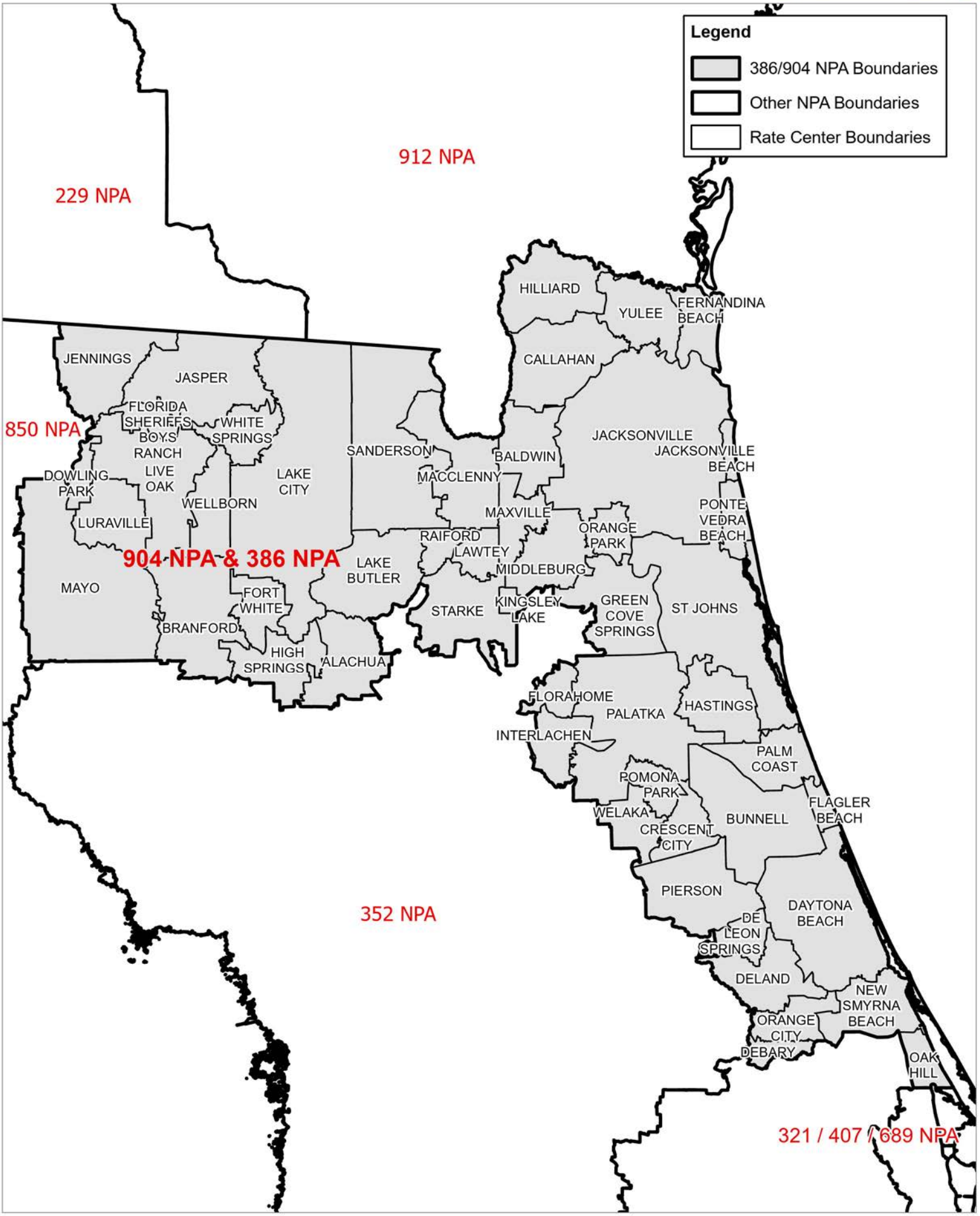
Alternative #2 – Boundary Elimination Overlay of 904 NPA and 386 NPA



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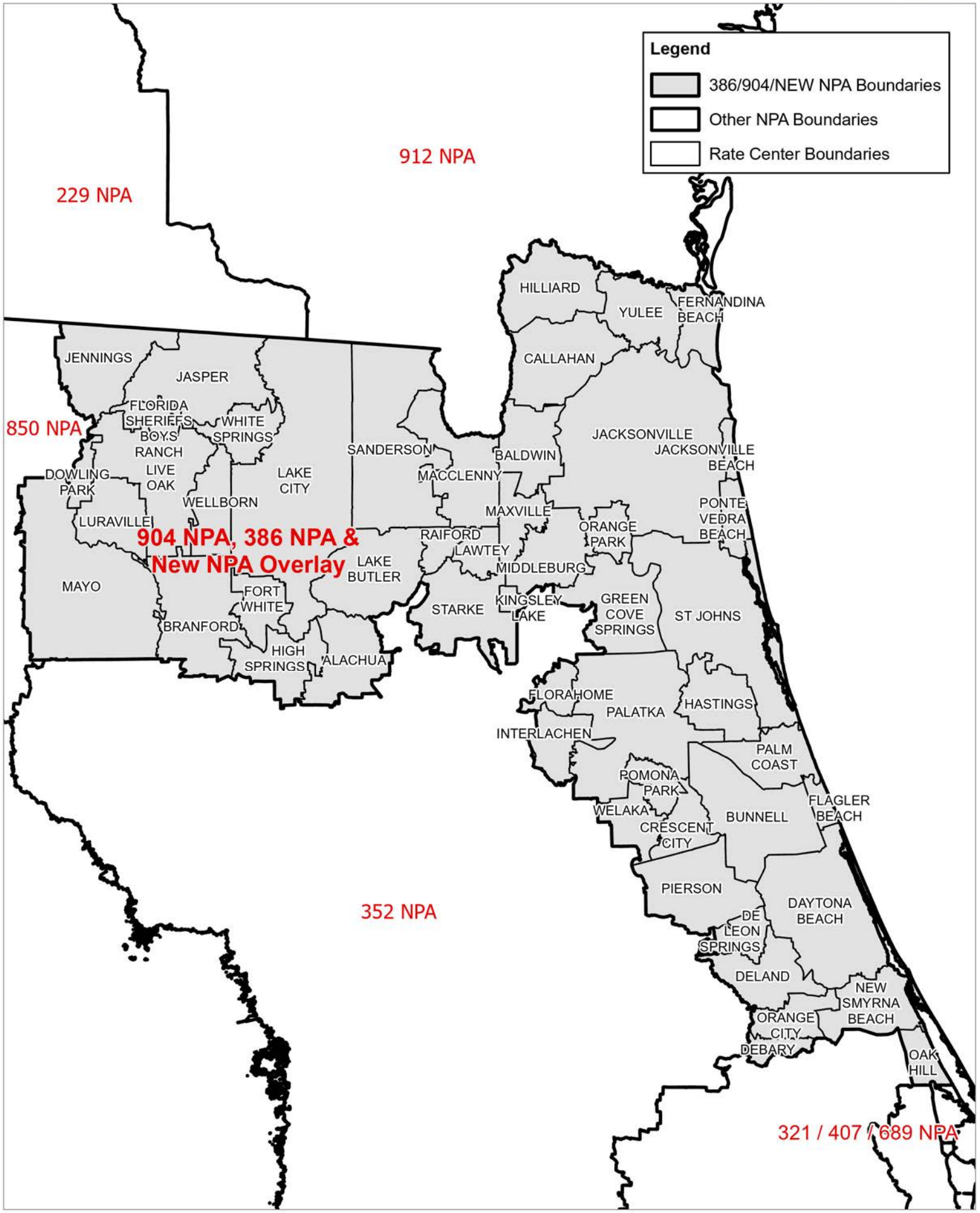
Alternative #3 – Boundary Elimination Overlay of 904 NPA and 386 NPA with a New NPA



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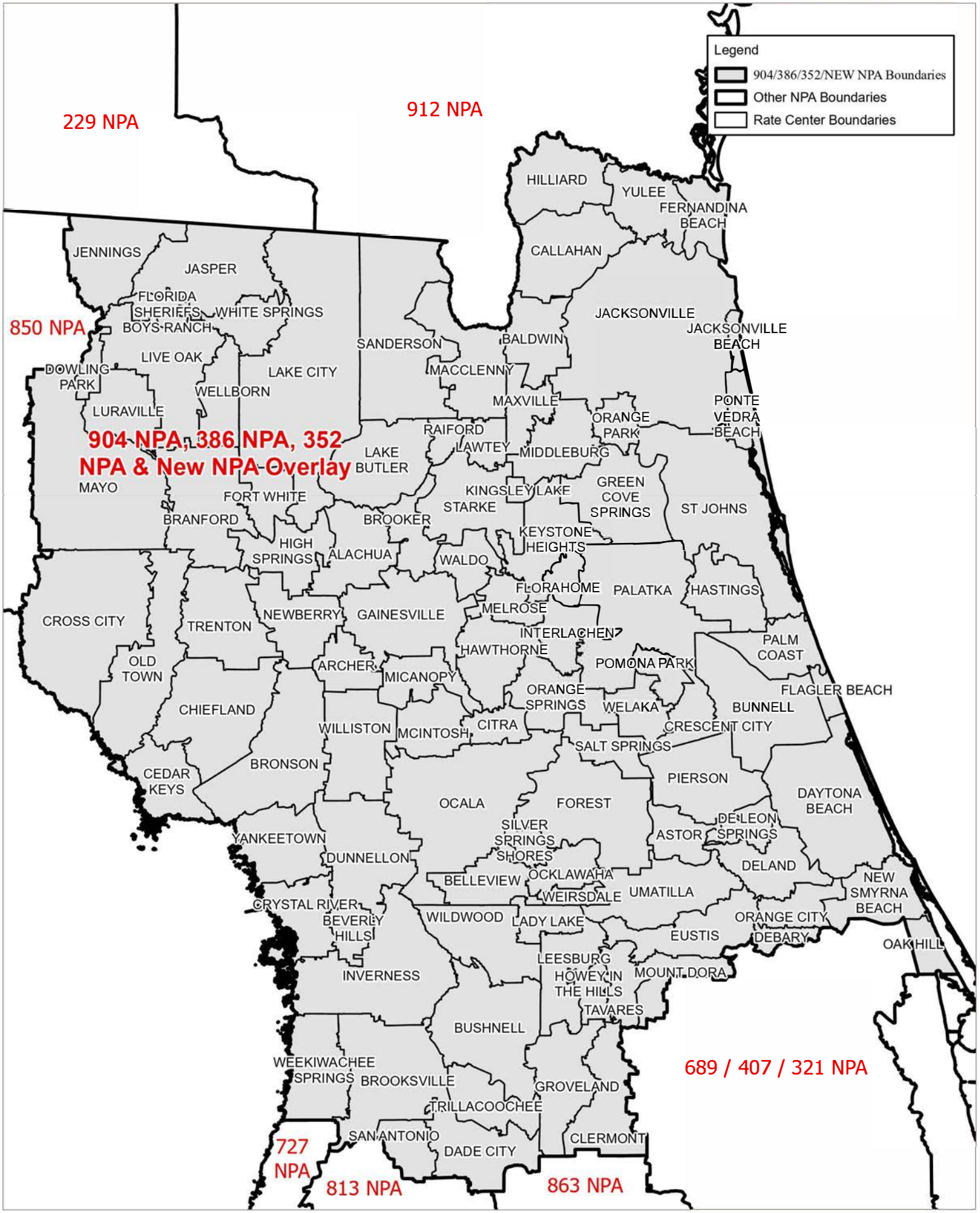
Alternative #4 – Boundary Elimination Overlay of 904 NPA, 386 NPA & 352 NPA with a New NPA



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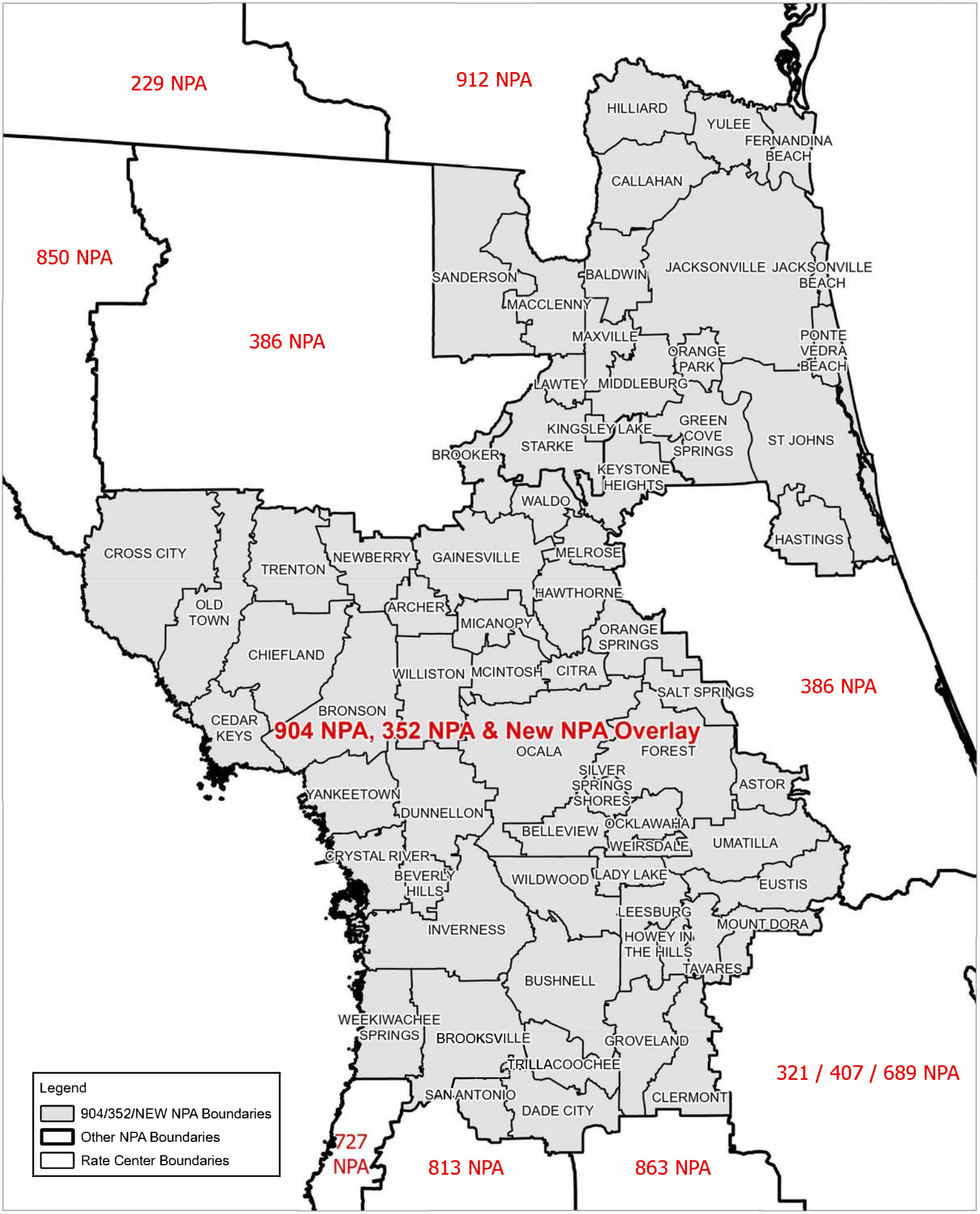
Alternative #5 - Boundary Elimination Overlay of 904 NPA, & 352 NPA with a New NPA



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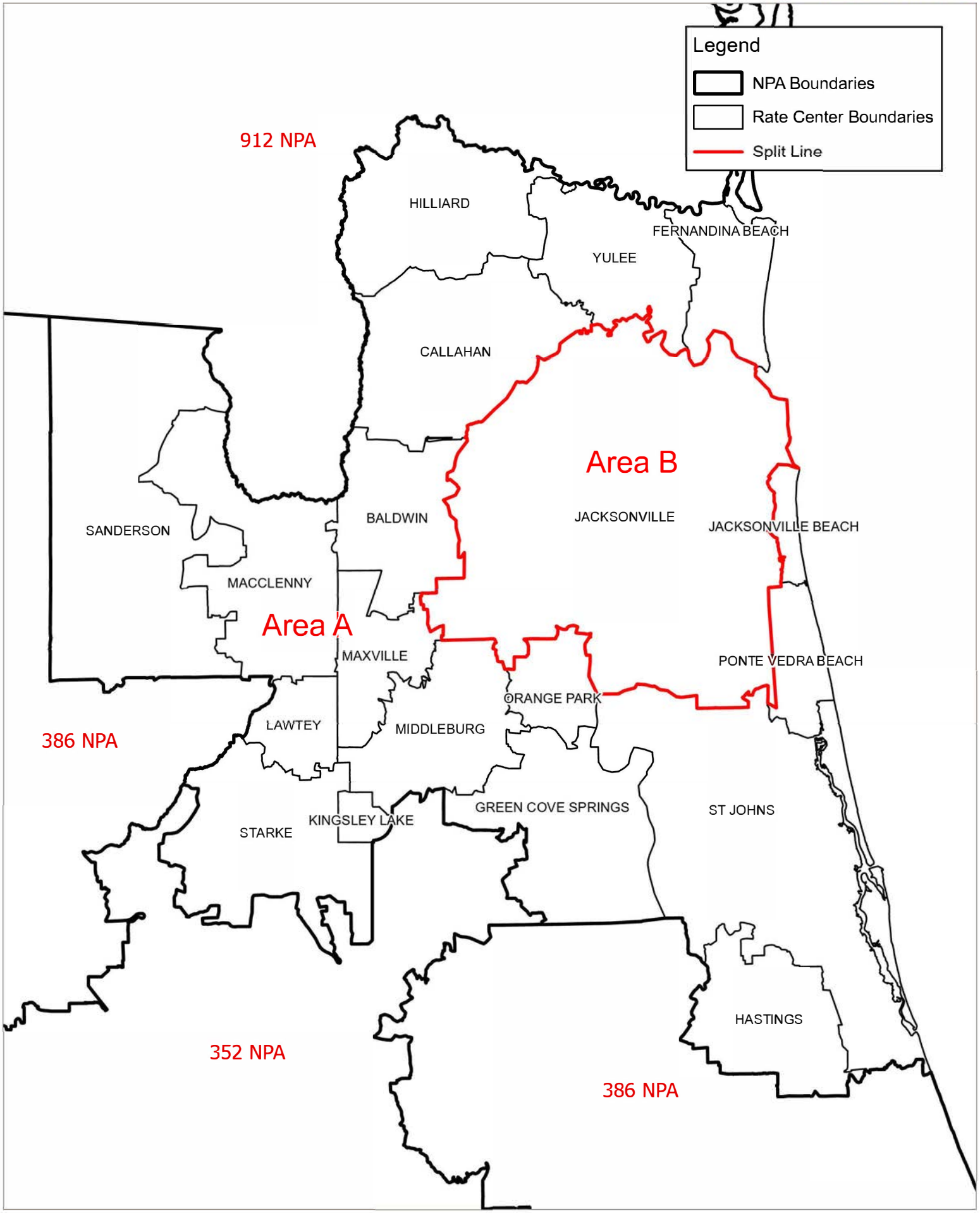
Alternative #6 – 904 NPA Split Rate Center Map



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