DOCKET NO. 20210168-TP FILED 10/22/2021 DOCUMENT NO. 12310-2021 FPSC - COMMISSION CLERK



October 22, 2021

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 561 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 561 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 fweber@nanpa.com

Before the FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of the)		
Implementation for Relief of)	Docket No	
the 561 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 561 NPA, serving Palm Beach County, Florida, is projected to exhaust its Central Office codes (often referred to as "CO" or "NXX" codes) during the third quarter of 2023 and is in need of relief. This means that absent NPA relief, the supply of CO codes in the 561 NPA is projected to run out during the projected exhaust quarter. In accordance with Industry guidelines, only an overlay will meet the requirements for relief of the 561 NPA, which is scheduled to transition to mandatory 10-digit dialing due to the national implementation of 988 to reach the National Suicide Prevention Lifeline.³ The Industry respectfully requests that the Commission expeditiously approve the Industry's plan to implement the overlay as set forth herein.

The Industry recommends that it implement the new NPA based upon a nine-month

 $^{^{\}scriptscriptstyle 1}$ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 561 NPA.

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

³ See NANPA Planning Letter 556 published on the NANPA website at https://www.nationalnanpa.com/pdf/PL_556.pdf

schedule. Adhering to the Industry agreed-upon timeframe schedule will allow the new NPA to be implemented six months prior to the projected exhaust of the 561 NPA. The Industry has completed the associated customer education and will complete implementation of mandatory 10-digit local dialing due to the implementation of 988 for the National Suicide Prevention Lifeline by July 15, 2022, which is well before the new relief NPA for the 561 NPA will be utilized.

I. Background

The 561 NPA has been in service since 1996. In 2002, the 561 NPA was nearing exhaust and the PSC approved a geographic split of the 561 NPA, introducing the 772 NPA. The 561 NPA is in the southeastern portion of Florida and serves Palm Beach County. The 561 NPA serves the larger cities of Palm Beach, Boca Raton, Wellington, Boynton Beach, Jupiter, Delray Beach, Belle Glade, and other smaller communities. The 561 NPA is bordered on the north and west by the 772 and 863 NPAs, to the east by the Atlantic Ocean and to the south by the 754/954 NPAs.

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 April 2021, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("April 2021 NRUF Report") which indicated that the 561 NPA would exhaust during the third quarter of 2024.4 However, due to an increase in CO code requests in the 561 NPA, NANPA declared jeopardy on September 23, 2021 and issued a "delta NRUF" which revised the estimated exhaust date to third

⁴ April 2021 NRUF and NPA Exhaust Analysis ("April 2021 NRUF Report"). The April 2021 NRUF Report can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.html.

quarter of 2023. 5 NANPA convened an industry meeting via web conference on October 12, 2021, for the Industry to establish final jeopardy procedures to ration the remaining CO codes in the 561 NPA until relief can be implemented.⁶

The 561 NPA is scheduled to complete the transition to mandatory 10-digit local dialing by July 15, 2022 as a result of the FCC's Order approving the designation of 988 as the three-digit abbreviated dialing code for the National Suicide Prevention Lifeline.⁷ The NPA Relief Planning Guidelines ("Guidelines") were amended to accommodate the impact on the national implementation of the 988 abbreviated dialing code will have on area code relief. The amended Guidelines state that "where NPA relief is required for a single NPA area and ... the NPA is scheduled to transition to 10-digit dialing...the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required."8 Due to this change to the Guidelines, the only option for relief of the 561 NPA is an overlay. As a result, NANPA distributed a draft relief petition to the Industry with the meeting notice on September 17, 2021.9 The industry met on October 12, 2021, to approve the petition for an all-services distributed overlay of the 561 NPA.¹⁰

⁵ The April 2021 NPA Exhaust Forecast Analysis Changes as of September 23, 2021 ("September 23, 2021 Delta NRUF") can be accessed on the NANPA website at: https://nationalnanpa.com/reports/Changes from April2021 %20NRUF Forecast 09.23.2021.pdf

⁶ The 561 NPA (Florida) Final Jeopardy Procedures can be accessed on the NANPA website at: https://www.nationalnanpa.com/news/jeopardy_declaration_table.html

⁷ Under the industry 10-digit dialing transition plan for 988 implementation, customers have been educated to expect that mandatory 10-digit dialing will begin on October 24, 2021. Service providers have between October 24, 2021 and July 15, 2022 to remove 7-digit dialing in the 561 NPA from their networks. See the 988 milestones posted on the NANPA website at: https://www.nationalnanpa.com/transition to 10 digit dialing for 988/index.html

⁸ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, July 2, 2021) at §5.6.3 ("NPA Relief Planning Guidelines"). In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://www.atis.org/o1 committ forums/inc/documents/.

⁹ NANPA's September 17, 2021 notice to the Industry is attached and incorporated as Exhibit B and contains CO code assignment information, thousands-block pooling statistics, and a map of the overlay.

¹⁰ A copy of the October 12, 2021 meeting minutes is attached and incorporated as Exhibit A.

II. Description of the Relief Option

The all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 561 NPA and is projected to last approximately 23 years. NANPA will assign CO codes from the new overlay NPA once all assignable CO codes from the 561 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. The implementation of an overlay requires mandatory 10-digit dialing for local calls, including calls within the same NPA. However, customers in the 561 NPA will have transitioned to mandatory 10-digit dialing as a result of the national implementation of 988 to reach the National Suicide Prevention Lifeline well before implementation of the new NPA.

The Industry-recommended dialing plan set forth in the following table is consistent with that implementation:

DIALING PLAN:

OVERLAY DIALING PLAN

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

^{*1+10} digit permissible at each service provider's discretion.

The Industry reached consensus to implement the new relief NPA in accordance with a nine-month schedule, which would start before, but not be completed until after mandatory 10-digit local dialing is completed in the 561 NPA as part of the 988 transition. ¹¹ The schedule does not include specific dates, but rather

 $^{^{11}}$ To ensure relief is implemented six months prior to exhaust of the 561 NPA, the nine-month implementation should start in in the second quarter of 2022 and complete in the first quarter of 2023.

timeframes to identify the phases of implementation. Once the Commission has approved the instant Petition, the Industry will select specific 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 expeditious 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 schedule is set forth in the table below. It should be noted that there is no requirement for a permissive dialing period because mandatory 10-digit dialing will be enforced before the nine-month implementation schedule is completed.

Implementation Timeframe Schedule for an All-Services Overlay

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	9-months
Earliest Activation of CO Codes in the new NPA	At completion of Customer Education and Network Preparation Period
Effective date of the new NPA	At completion of Customer Education and Network Preparation period
	No later than 1Q2023

III. 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 561 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 561 NPA in accordance with the implementation schedule set forth above. As such, and because the 561 NPA is in jeopardy, the Industry requests that the Commission grant this petition no later than February 28, 2022.

Respectfully submitted,

/s/Florence Weber

Florence Weber

Senior Director,
North American Numbering Plan
Administrator
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Herndon, VA 20171
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October 22, 2021

EXHIBIT A



October 21, 2021

To: All 561 NPA Code Holders and Interested Industry Members (Florida)

Subject: Final Minutes of the Relief Filing Review Meeting for the 561 NPA

Attached are the final minutes from the October 12, 2021, Florida 561 NPA Relief Filing Review meeting. These minutes became final on October 21, 2021. The notice with the final minutes was posted to the NAS-NANP Notification System (NAS-NNS) website on October 21, 2021 and is 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 561 NPA DRAFT RELIEF PETITION REVIEW MEETING via WEB CONFERENCE FINAL MINUTES October 12, 2021

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner – North American Numbering Plan Administrator ("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 and NANPA's role and responsibilities.

NANPA'S ROLE AND RESPONSIBILITIES

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

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA. In this case, based on the April 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis the projected exhaust for the 561 NPA was third quarter of 2024 (3Q2024). Due to an increase in Central Office ("CO") code assignments, on September 23, 2021, NANPA published a revised NPA exhaust projection, moving the exhaust date in by four quarters to third quarter of 2023 (3Q2023).
- NANPA distributes the notice with the draft petition at least three weeks prior to the initial relief planning meeting, which was completed on September 17, 2021.
- The main objective is achieved by reaching consensus on the relief petition to be filed with the Florida Public Service Commission ("Commission").
- Determines any additional items to include in the petition such as the implementation intervals.
- NANPA is then charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the petition, NANPA will file it within six weeks of today's meeting.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

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, Cecilia 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.

Cecilia reviewed the most pertinent items from the Industry Numbering Committee (INC) NPA Code Relief and Planning and Notification Guidelines for this meeting as follows:

Section 5.6.3 - 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 dialing¹, 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

¹ For example, FCC 20-100, ¶53.

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.

The NPA Code Relief Planning and Notification Guidelines, as well as other relevant guidelines, may be downloaded from the ATIS web site at: (www.atis.org).

BACKGROUND:

The 561 NPA was introduced on May 13, 1996, in a split from the 407 NPA. In 2002, the 561 NPA was split again to create the 772 NPA which serves the Treasure Coast. The 561 NPA serves the larger cities of Palm Beach, Boca Raton, Wellington, Boynton Beach, Jupiter, Delray Beach, Belle Glade and other smaller communities. The 561 NPA is bordered on the north and west by the 772 and 863 NPAs, to the east by the Atlantic Ocean and to the south by the 754/954 NPAs.

The April 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("2021 NRUF Report"), published by NANPA, projected the exhaust of the 561 NPA during the third quarter of 2024 (3Q2024). NANPA published a delta NRUF on September 23, 2021 which indicated an increase in CO code assignments and the projected exhaust changed from third quarter of 2024 (3Q2024) to third quarter of 2023 (3Q2023).

Jeopardy was declared on September 23, 2021 and interim Jeopardy procedures were put into effect immediately with rationing set at 3 CO codes per month. NANPA will convene the industry on October 13, 2021 to reach consensus on final jeopardy procedures.

Per NANPA Planning Letter (PL-556), on July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022. The Order requires covered providers to implement mandatory 10-digit local dialing in NPAs that use both 7-digit dialing and 988 as an NXX. The 561 NPA is included in the requirements of this FCC order.

Below is the implementation schedule to transition to 10-digit local dialing for the 988 3-digit code to reach the National Suicide Prevention Lifeline.

ACTION	TIME	DATE
Start of Network Preparation and Customer Education		July 16, 2020 (This starts the 9.5-month period prior to permissive dialing effective date for carriers to implement permissive 10-digit dialing in their networks and start educating customers about the upcoming dates.)
Start of permissive 10-digit dialing ("permissive 10-digit dialing effective date")	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the "permissive dialing date" and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation.)
End of permissive dialing and start of mandatory 10-digit dialing ("mandatory 10-digit dialing effective date")	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the "mandatory dialing date" and starts the 8.5-month period where carriers can start enforcing mandatory 10-digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing.)
Covered providers shall transmit all calls initiated by an end user dialing 988 to the current toll-free access number for the National Suicide Prevention Lifeline, presently 1-800-273-8255 (TALK)	12:01 am local time	July 16, 2022

STATUS OF FLORIDA 561 NPA

CO Code Assignment History:

Cecilia provided a read-out of the monthly CO Code Assignment Activity for the Florida 561 NPA. As of October 11, 2021, the 561 NPA has 721 codes assigned, 59 codes available for assignment and 20 Un-Assignable codes. There have been 32 assignments in 2021 (as of October 11, 2021), 32 codes assigned in 2020, 27 codes assigned in 2019, 19 codes assigned in 2018, 6 codes assigned in 2017, and 15 codes assigned in 2016. (See Attachment 2)

There are 50 service provider OCNs that are code holders and 14 OCNs that are only thousands-block holders in the 561 NPA.

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Thousands-Block Status of 561 NPA

Thousands-Block pooling commenced on February 5, 2001. There are 7 rate centers and all 7 are mandatory pooling. From October 1, 2020 through October 11, 2021, there have been 498 blocks assigned and there are 18 blocks available as of October 11, 2021. For the same period, 46 codes have been assigned; 45 for pool replenishment and 1 for an LRN. The forecasted need for CO codes for the next twelve months is 13 codes for pool replenishment and dedicated customers. (See Attachment 3)

CUSTOMER EDUCATION PLAN

NANPA streamlined the relief petition in order to make the relief planning process quicker and easier for the industry and the Commission. There was discussion regarding including additional items in the minutes and consensus was reached to include the following customer and technical milestones for implementation of an additional overlay.

Customer Milestones:

Task #	Customer Education Tasks	Responsibility
1	Single customer notification of	All Service Providers
	new NPA through methods such as	
	bill messages, bill inserts,	
	direct mail, text messaging, email	
2	Issue initial press release	FL Commission; Service
		Providers to the extent they are
		able to do so
3	Send Special letters to PSAPs and	Co-chairs of industry committee
	Directory Publishers	
4	Update social media with	All Service Providers (optional)
	information regarding overlay	
5	Update websites with information	All Service Providers
	regarding overlay	
6	Develop language for use in	Service Providers that publish
	Directories to alert the consumers of	directories
	the new area code.	
7	Issue second press	FL Commission; Service
	Release just prior to effective date	Providers to the extent they are
	of new NPA	able to do so

Technical Milestones:

Task #	Technical Tasks	Responsibility
1	Obtain industry test code from	One Service Provider volunteer
	NANPA and activate the test	
	number.	
2	Open the test code in carriers'	All Service Providers
	network.	
3	Establish NPA-Specific type of	All Service Providers (as needed)

	Trunks (as needed)	
	E911 Work Plan Tasks	
4	Confirm new Emergency Service	E911 Providers
	Number (ESN)/Numbering Plan	
	Digit (NPD) has been established for	
	the new NPA (if needed)	
5	Ensure Selective Router Database	E911 Providers
	(SRDB) table has new NPA built in	
6	3	E911 Providers
	and County Coordinators of new	
	area code	
7	Review and Submit CLEC Trunk	All Service Providers (as needed)
	Order Requests to local provider if	
	needed	
8	Update PSAP equipment to recognize	PSAPs
	the new area code	
9	Trunk Orders Complete	E911 Providers
10	Build E911 Network/Tandem	E911 Providers
	Translations	

The above are the typical milestones necessary for implementation of an additional overlay; however, these may need to be modified by the industry during the actual implementation.

REVIEW DRAFT RELIEF PETITION FOR THE 561 NPA

Cecilia reviewed the draft relief petition for the 561 NPA distributed on September 17, 2021, which recommends an all-services distributed overlay. A new NPA code would be assigned to the same geographic area occupied by the existing 561 NPA. Customers would retain their current telephone numbers and the same dialing plan would apply to the new area code. The projected life of the new area code is approximately 23 years based on historic assignment rates. The Industry reached consensus to approve NANPA's recommended petition with some suggested edits.

DIALING PLAN

The dialing plan for the 561 NPA overlay will be as follows:

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

^{*1+10} digit permissible at each service provider's discretion.

ESTABLISH IMPLEMENTATION SCHEDULE

The Industry reached consensus to recommend to the Commission a nine-month schedule for implementation of the overlay with the new NPA effective 6-months prior to the forecasted exhaust. Since mandatory 10-digit local dialing will be in place as a result of the 988 transition prior to the implementation of the new overlay, there is no permissive dialing period. The recommended schedule is as follows:

EVENT	TIMEFRAME		
Customer Education and Network Preparation Period	9- months		
Earliest Activation of CO Codes in the new NPA	At completion of Customer Education and Network Preparation Period		
Effective date of the new NPA	At completion of Customer Education and Network Preparation period		
	No later than 1Q2023		

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

The Industry reached consensus that NANPA will file the petition with the Commission informing them of the outcome of this relief meeting. The INC guidelines require the relief petition to be filed with the regulator within 6 weeks (November 23, 2021) of the initial relief planning meeting unless otherwise decided by the industry but NANPA plans to file the relief petition by October 22, 2021.

REVIEW OF DRAFT MEETING MINUTES

The Industry reached consensus that the draft minutes resulting from this meeting will be distributed to the industry no later than October 15, 2021. Any changes or corrections are to be submitted to Cecilia by email at cmccabe@nanpa.com by October 22, 2021 when the minutes will become final.

STATEMENTS FOR THE RECORD

There were no statements submitted for the record.

The meeting was adjourned

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These minutes became final on October 21, 2021.

Florida 561 NPA Draft Relief Petition Review via Web Conference October 12, 2021 Participants

NAME	COMPANY		
Sharon Poer	AT&T		
Rita Schmitz	CenturyLink/Lumen		
Melinda Yost	DISH Wireless		
Kathy Rogers	DISH Wireless		
Sakina Deas	Florida Public Service Commission		
Greg Fogleman	Florida Public Service Commission		
Ellen Washbon	Frontier		
Paul Belote	Inteliquent		
Cecilia McCabe	NANPA		
Heidi Wayman	NANPA		
Linda Hymans	NANPA		
Florence Weber	NANPA		
Joseph Acosta	Smart City		
Marlene Bryan	Smart City		
Shaunna Forshee	T-Mobile		
Allyson Blevins	Twilio		
Chanda Brown	Verizon		
Dana Crandall	Verizon Wireless		

Florida 561 NPA CO Code Summary

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THOUSANDS-BLOCK STATISTICS		
ST/NPA:	FL 561	
MEETING DATE:	10/12/2021	
POOL START DATE (PSD)	2/5/2001	
RATE CENTERS		
# Total	7	
# Mandatory	7	
# Mandatory-Single Service Providers (M*)	0	
# Optional	0	
# Excluded	0	
BLOCKS ASSIGNED		
# Total	498	
(For time period 10/01/20 -10/11/21)		
BLOCKS AVAILABLE		
#Total	18	
(As of preparation date: 10/11/21)		
CODES ASSIGNED		
# Total	46	
# for Pool Replenishment	45	
# for Dedicated Customers	0	
# for LRNs	1	
(For time period 10/01/20 - 10/11/21)		
CODES FORECASTED		
# Total	13	
# for Pool Replenishment and Dedicated Customers	13	
# for LRNs	0	
(For the next twelve months as of: 10/11/21)		

EXHIBIT B



September 17, 2021

To: All 561 NPA Code Holders and Interested Industry Members (Florida)

Subject: Florida 561 NPA Draft Relief Filing 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 ("Guidelines"ATIS-0300061). Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("April 2021 NRUF Report"), published by NANPA, projects the exhaust of the 561 NPA during the third quarter of 2024.

Per Section 5.6.3 of the Guidelines, NANPA is to draft a relief plan requesting approval of an overlay. Accordingly, on October 12, 2021, NANPA will convene an industry NPA relief planning meeting to review and approve the draft relief filing for the 561 NPA. Included with this meeting notice is the meeting agenda, consensus process, pertinent INC guidelines, customer and technical milestones, CO code summary and Pooling statistics report, Service Provider CO code assignments by OCN, a rate center table and a rate center map.

Because the impacts of NPA relief are so significant and because this NPA is affected by the transition of the 988 NXX to a 3-digit code for the National Suicide Prevention Lifeline that will require 10-digit local dialing, NANPA strongly urges your participation on October 12, 2021. This may be the only meeting of the industry before a decision is reached on the relief filing that will be submitted to the Florida Public Service Commission for approval. The details of the relief planning meeting are as follows:

Date: Tuesday, October 12, 2021

Time: 2:00 pm, ET; 1:00 pm CT; 12:00 pm MT; 11:00 am PT

Join Zoom Meeting

https://somos.zoom.us/j/83426664562?pwd=b1czMGdQcTIzOGxKSWkxUHVaKzVTUT09

Meeting ID: 834 2666 4562

Password: 092136

One tap mobile 8778535257,,83426664562# US Toll-free 8884754499,,83426664562# US Toll-free

Dial by your location

877 853 5257 US Toll-free 888 475 4499 US Toll-free Meeting ID: 834 2666 4562

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you receive this notice from someone else and would like to receive additional information in the future about the 561 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 561 NPA DRAFT RELIEF FILING REVIEW MEETING VIA WEB CONFERENCE

October 12, 2021 - 2:00 PM (ET)

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record
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NANPA's Role and Responsibilities

Review INC Guidelines

Review 561 Background, History and Status

Review Draft Relief Filing

Consensus on Implementation Intervals for Relief

Consensus on Customer Education and Technical Milestones

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

NOVEMBER /16/2020

ATIS OPERATING PROCEDURES

VERSION 5.6

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.

5. 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 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.¹
- The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² 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 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

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

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.

5.6.3

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 dialing³, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition 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 petition 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 petition. 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 10 days of the conference call.

NANPA shall submit the petition 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.

6. 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

³ For example, FCC 20-100, ¶53.

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 Method

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.⁴ 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:

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.

⁴ 47 CFR §52.19 (c) (3) (ii).

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.



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 overlay	
5	Update websites with information regarding 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:



Relief Planning Meeting Aid Customer Education and 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		
	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	
	1.1	reflect 10-digit dialing	
	11	Recorded announcements in Place and	
		Tested F011 W. J. Bl	
	10	E911 Work Plan	
	12	Confirm new ESN/NPD has been	
\vdash	12	established for the new NPA Ensure SRDB table has new NPA built	
	13	•	
	1./	Notify PSAPs, PSALI customers and	
	14	County Coordinators (1st and 2nd	
		Notification)	
	15	Review and Submit CLEC Trunk	
		Order Requests to local provider if	
		needed	
	16	Update PSAP equipment	
		Trunk Orders Complete	
		Build E911 Network/Tandem	
		Translations	



Relief Planning Meeting Aid Customer Education and Technical Milestones

	19 Verify if all PSAP work has been completed	
	20 Activate E911 Network/Tandem Translations	

561 NPA Background Information

Relief Planning Background and Assumptions:

The 561 NPA was introduced on May 13, 1996, in a split from the 407 NPA. In 2002, the 561 NPA was split again to create the 772 NPA which serves the Treasure Coast. The 561 NPA serves the larger cities of Palm Beach, Boca Raton, Wellington, Boynton Beach, Jupiter, Delray Beach, Belle Glade and other smaller communities. The 561 NPA is bordered on the north and west by the 772 and 863 NPAs, to the East by the Atlantic Ocean and to the south by the 754/954 NPAs.

CO Code Summary:

As of August 30, 2021, the 561 NPA has 717 codes assigned, 63 codes available for assignment and 20 Un-Assignable codes. There are 50 service provider OCNs that are code holders in the 561 NPA and 14 OCNs that are only thousands-block holders in the NPA.

Exhaust Forecast:

The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("April 2021 NRUF Report"), published by NANPA, indicates that the 561 NPA will exhaust during the third quarter of 2024. Relief planning for an additional overlay NPA is to start in the third quarter of 2021.

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 561 NPA

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	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)
Credit card, collect, third		
party		

OVERLAY DIALING PLAN

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

^{*1+10} digit permissible at each service provider's discretion.

Florida 561 NPA CO Code Summary

NPA	561				
Assigned NXXs	717				
Protected NXXs	0				
Reserved NXXs	0				
Unavailable NXXs	20	See Not	e		
Available NXXs	63				
Total	800				
Codes Assignment History					
Codes Assignment History 2016	15				
* *	6				
2017					
2018	19				
2019	27				
2020	32				
2021	32*				
*As of September 13, 2021					
_					
Note: Unavailable indicates codes					
codes include, but are not limited				59,	
555, time), N11 and other unique					
with special dialing arrangements	(e.g., 7-di	git dialing	across		
NPA boundary).					

THOUSANDS-BLOCK STATISTICS	
Provided By: Cecilia McCabe	
ST/NPA:	FL 561
MEETING DATE:	10/12/2021
POOL START DATE (PSD)	2/5/2001
RATE CENTERS	
# Total	7
# Mandatory	7
# Mandatory-Single Service Providers (M*)	0
# Optional	0
# Excluded	0
BLOCKS ASSIGNED	
# Total	440
(For time period 10/01/20 -9/13/21)	
BLOCKS AVAILABLE	
#Total	36
(As of preparation date: 9/13/21)	
CODER A COLONER	
CODES ASSIGNED	42
# For Pool Parlarishment	42
# for Pool Replenishment	41
# for Dedicated Customers # for LRNs	<u>0</u> 1
(For time period 10/01/20 - 9/13/21)	1
(1 or time period 10/01/20 - 9/13/21)	
CODES FORECASTED	
# Total	9
# for Pool Replenishment and Dedicated Customers	9
# for LRNs	0
(For the next twelve months as of: 9/13/21)	•

FL 561 NPA Code Holder List

Company	OCN	CountOfNXX
ABC PAGING CITY BEEPERS, INC.	6548	8
AIRUS, INC FL	484H	1
AMERICAN MESSAGING SERVICES, LLC	6483	1
AMERICAN MESSAGING SERVICES, LLC	6906	2
AMERICAN MESSAGING SERVICES, LLC	9748	6
AT&T - LOCAL	7421	4
AT&T CORP.	516C	3
BANDWIDTH.COM CLEC, LLC - FL	982E	19
BARR TELL USA, INC FL	305H	4
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	198
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	87
COMCAST PHONE OF FLORIDA, LLC - FL	7562	13
CORETEL FLORIDA, INC FL	481F	3
DELTACOM, INC FL	4616	5
FRACTEL, LLC	965H	8
FUSION CLOUD SERVICES, LLC	018A	7
FUSION CLOUD SERVICES, LLC	2721	1
FUSION COMMUNICATIONS, LLC	700E	1
GLOBAL CROSSING LOCAL SERVICES, INC FL	2547	5
IDT AMERICA CORP FL	765A	1
INTEGRATED PATH COMMUNICATIONS, LLC - FL	010H	1
INVOXIO INCORPORATED	158H	4
ITS TELECOMMUNICATIONS SYSTEMS, INC FL	572G	2
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	16
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	3
LOCAL ACCESS LLC - FL	965G	2
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	12
METROPCS, INC.	5562	22
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	67
OMNIPOINT MIAMI E LICENSE, LLC	6889	40
ONVOY SPECTRUM, LLC	624H	4
ONVOY, LLC - FL	937C	15
OPTICAL TELECOMMUNICATIONS, INC FL	480D	2
PAETEC COMMUNICATIONS, INC FL	4227	10
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	3
RADIANTIQ LLC	566J	1
RIGHT CALL LLC	365J	2
SPRINT SPECTRUM, L.P.	6664	42
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	13
TELNYX LLC	073H	2

FL 561 NPA Code Holder List

TERRA NOVA TELECOM, INC FL	382G	2
US LEC OF FLORIDA, INC.	8692	8
USA MOBILITY WIRELESS, INC.	6630	23
VOIP INNOVATIONS, LLC	597F	1
VONAGE AMERICA LLC	197D	1
WINDSTREAM NUVOX, INC.	8660	4
WINDSTREAM NUVOX, INC FL	4085	14
XO FLORIDA, INC.	6100	19
YMAX COMMUNICATIONS CORP FL	594D	5

Block holders with No CO Codes Assigned

Company	OCN
RCLEC, INC.	156J
FUSION CLOUD SERVICES, LLC	206A
FUSION CLOUD SERVICES, LLC	2720
HD CARRIER LLC	321J
TWILIO INTERNATIONAL, INC.	506J
CENTURYLINK COMMUNICATIONS, LLC	508J
IP HORIZON LLC	515J
DIGITALIPVOICE, INC FL	520F
WHITESKY COMMUNICATIONS, LLC	553J
WIDE VOICE, LLC - FL	704G
TELCOVE INVESTMENT, LLC - FL	7131
INTRADO COMMUNICATIONS, LLC	813C
TALKIE COMMUNICATIONS, INC FL	886H
DSL INTERNET CORPORATION - FL	9264

561 FL Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
561	BELLEGLADE	BELLE GLADE
561	BOCA RATON	BOCA RATON
561	BOYNTONBCH	BOYNTON BEACH
561	DELRAY BCH	DELRAY BEACH
561	JUPITER	JUPITER
561	PAHOKEE	PAHOKEE
561	WPALMBEACH	WEST PALM BEACH

