



December 2, 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 305/786 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 305/786 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  
Plan Administrator  
925-420-0340  
[fweber@nanpa.com](mailto:fweber@nanpa.com)



Industry's consensus recommendation to implement Alternative #1, the all-services distributed overlay of the 305/786 NPA overlay, as set forth herein.

**Background:** The 305 NPA was created in 1947 and originally covered the entire state of Florida. However, population growth in Florida quickly led to adding more area codes. The first geographic split of the 305 NPA was in 1953, creating the 813 NPA, and over the next 40 years was split again to create the 407 and 954 NPAs.

The 786 NPA was added as an overlay to the 305 NPA in 1998. The overlay originally covered only Miami-Dade County but was expanded to include the Keys in 2014. The 305/786 NPA overlay is located in the southeastern corner of Florida and serves Miami-Dade County, a portion of Monroe County, and includes municipalities such as Miami, Coral Gables, Homestead, as well as the Florida Keys. The 305/786 NPA overlay is bordered on the north by the 754/954 NPA overlay, south and east by the Atlantic Ocean and to the west by the 239 NPA.

Due to an increase in CO code assignments, NANPA declared Jeopardy<sup>4</sup> for the 305/786 NPA overlay on September 23, 2021, and interim Jeopardy procedures were placed into effect. NANPA convened an industry meeting on October 13, 2021, and the Industry reached consensus on the final Jeopardy procedures, which went into effect on the same day. Under the final Jeopardy procedures, four (4) CO Codes may be allocated per month and a maximum of four (4) CO code requests per Operating Company Number ("OCN") may be submitted each month. The Industry set a trigger for NANPA to reconvene the Industry to revisit the Jeopardy procedures if less than 35

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<sup>4</sup> With FCC approval, NANPA declares jeopardy in order to ration the number of CO codes that can be assigned each month when the supply of numbers could exhaust before relief can be implemented.

CO codes have been assigned following the September 2022 lottery.

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected demand 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 305/786 NPA overlay would exhaust during the first quarter of 2024.<sup>5</sup>

As referenced earlier, the only option for relief of the 305/786 NPA overlay is an additional overlay. However, NANPA determined there were three overlay options possible for relief of the 305/786 NPA overlay; an all-services distributed overlay, a boundary elimination overlay, and a boundary elimination overlay with the addition of a new NPA. NANPA included all three alternatives in the Initial Planning Document (“IPD”)<sup>6</sup> and distributed it to the Industry with the meeting notice on October 18, 2021.<sup>7</sup>

The Industry met on November 8, 2021 (“meeting”), to review the following three relief alternatives in the IPD:

- **Alternative #1:** An all-services distributed overlay of the 305/786 NPA

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<sup>5</sup> October 2021 NRUF and NPA Exhaust Analysis (“October 2021 NRUF Report”). The October 2021 NRUF Report can be accessed on the NANPA web site at [https://www.nationalnanpa.com/reports/reports\\_npa.html](https://www.nationalnanpa.com/reports/reports_npa.html).

<sup>6</sup> A copy of the IPD is included in Exhibit A.

<sup>7</sup> NANPA’s October 18, 2021 notice to the Industry is attached and incorporated as Exhibit A and contains CO code assignment information, thousands-block pooling statistics, the IPD, and maps of the overlay alternatives.

overlay. A new NPA would be assigned to the same geographic area occupied by the existing 305/786 NPA overlay. Customers would retain their current telephone numbers. 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 305/786 NPA overlay have been exhausted. At exhaust of the 305/786 NPA overlay all future code assignments will be made in the new NPA. This alternative has a projected life of 19 years.

- **Alternative #2:** A boundary elimination overlay of the 305/786 and 754/954 NPA overlays. This boundary elimination alternative would remove the boundary between the 305/786 and 754/954 NPA overlays creating one all-services distributed overlay area. CO codes from the non-exhausting 754/954 NPA overlay would be assignable in the exhausting 305/786 NPA overlay, and any remaining CO codes from the exhausting 305/786 NPA overlay would be assignable in the non-exhausting 754/954 overlay after the boundary elimination overlay is implemented. Alternative #2 would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995. This alternative would also eliminate the need to assign a new NPA but has a projected life of only 10 years.
- **Alternative #3:** A boundary elimination overlay of the 305/786 and 754/954 NPA overlays with the addition of a new overlay NPA. Similar to Alternative #2, this boundary elimination alternative would remove the boundary between the 305/786 and 754/954 NPA overlays creating one all-services distributed overlay area while also adding a new overlay NPA. CO codes from the non-exhausting 754/954 NPA overlay would be

assignable in the exhausting 305/786 NPA overlay, and any remaining CO codes from the exhausting 305/786 NPA overlay would be assignable in the non-exhausting 754/954 NPA overlay after the boundary elimination overlay is implemented. Once all of the CO codes in the four existing NPAs are exhausted, assignments would begin in the new overlay NPA.

Alternative #3 has a projected life of 22 years and like Alternative #2, would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995.

During the meeting, the Industry participants discussed the attributes of the three relief alternatives and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay of the 305/786 NPA overlay as the preferred form of relief. The Industry supported the all-services distributed overlay alternative because the 305/786 NPA overlay is currently in a Jeopardy rationing situation and the all-services distributed overlay will take less time to implement than the boundary elimination alternatives. Implementation of the all-services distributed overlay also will cause less customer confusion and require customer education only in the 305/786 NPA overlay area. The two boundary elimination alternatives would require more technical work, modifications to all of the switches in the four affected overlay NPAs as well as additional customer notices in both overlay NPA areas.<sup>8</sup>

The Industry also established, by consensus, a relief implementation schedule which includes flexible timeframes so that the Industry can accommodate certain

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<sup>8</sup> See Exhibit B, attached hereto, which includes the final meeting minutes from the November 8, 2021, meeting, including Industry consensus on pros and cons for each relief alternative.

holidays, high traffic days, network freeze periods<sup>9</sup>, and prevent overlapping implementation dates for other NPA relief activities occurring in other parts of the country. The Industry recommends that it implement the new overlay NPA based upon a nine-month schedule.

**Description of the Overlay:** The all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 305/786 NPA overlay and is projected to last approximately 19 years. NANPA would not assign CO codes from the new overlay NPA until all assignable CO codes from the 305/786 NPA overlay are exhausted. All existing customers would retain their current area codes in the overlay area and would not have to change their telephone numbers.

The following dialing plan already in place for 305/786 NPA overlay will not change because 10-digit local dialing is already in place except to include a note stating that 1+10-digit dialing for local calls is permissible at each service provider’s discretion.

**DIALING PLAN**

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

The Industry reached consensus to implement relief in accordance with a

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<sup>9</sup> Many service providers institute network “freezes” from around Thanksgiving to mid-January each year to avoid making any significant changes to the network that might impact customers over the holidays.

nine-month schedule. 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 dates at an initial 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 schedule will alleviate the ongoing need for Jeopardy rationing of CO codes each month that can lead to delay or denial of service to telecommunications providers’ customers if the telecommunications providers are unable to obtain needed numbering resources under the rationing procedures that will continue until the addition of the new NPA.

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

**Implementation Timeframe**

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	9 Months
Effective date of the new NPA (and earliest possible CO code activation) *	At the completion of customer education and network preparation period (6 months prior to exhaust)

*\* CO codes in the new NPA will not be assigned until all available codes in the 305/786 NPA have been exhausted.*

**Conclusion:** The Industry requests that this Petition be granted expeditiously and to the extent possible, 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 305/786 NPA overlay in accordance with the implementation



schedule set forth above. As such, the Industry requests that the Commission grant this petition no later than May 31, 2022.

Respectfully submitted,

/s/ Florence Weber

Florence Weber

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December 2, 2021

# EXHIBIT A



October 18, 2021

To: All 305/786 NPA Code Holders and Interested Industry Members (Florida)

Subject: Florida 305/786 NPA Initial Planning Document Review

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On September 23, 2021, the North American Number Plan Administrator (NANPA) declared jeopardy in the 305/786 NPA. In accordance with the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061) “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. The October 2021 Numbering Resource Utilization/Forecast (NRUF)) and NPA Exhaust Analysis (“2021 NRUF Report”), published by NANPA, indicated that the 305/786 NPA would exhaust during the first quarter of 2024.

The NPA Code Relief Planning and Notification Guidelines state that where relief is required for an existing overlay complex, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. However, NANPA has determined that more than one overlay alternative is available as a viable relief option for the 305/786 NPA.

Accordingly, on November 8, 2021, NANPA will convene an industry NPA relief planning meeting to develop a recommended relief plan for the 305/786 NPA. The objective of this meeting is to reach consensus among members of the Florida telecommunications industry (“Industry”) on a single plan of relief for the 305/786 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. Since one of the relief alternatives in this document impacts the 754/954 NPA, carriers that provide service in this area are invited to attend.

Included with this meeting notice is the meeting agenda, consensus process, 305/786 NPA Central Office (“CO code”) Summary and Thousands-Block Statistics reports, relief planning meeting aids, Service Provider CO code assignments by OCN, rate center table, customer and technical milestones, and associated maps. Due to the fact that a relief alternative outlined in this notice impacts the Florida 754/854 NPAs, the CO Code Summary and Thousands-Block Statistics reports, Service Provider CO code assignments by OCN, and rate center table are included for this additional overlay complex.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on November 8, 2021. 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: Monday, November 8, 2021**

**Time: 1:00 pm, ET; 12:00 pm CT; 11:00 am MT; 10:00 am PT**

**Join Zoom Meeting**

<https://somos.zoom.us/j/89663940112?pwd=eFY5bkRIL0pBbFRQMVh6VEwrSkhDZz09>

**Meeting ID:** 896 6394 0112

**Password:** 202138

One tap mobile

8778535257,,89663940112# US Toll-free

8884754499,,89663940112# US Toll-free

Dial by your location

877 853 5257 US Toll-free

888 475 4499 US Toll-free

Meeting ID: 896 6394 0112

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 have received this notice from someone else and are planning to attend this meeting, please notify Cecilia McCabe at the email address below. You are also encouraged to sign up to NANPA's NAS-NNS by going to [www.nationalnanpa.com](http://www.nationalnanpa.com), then selecting NAS Login and then selecting New Registration and following the sign-up process to receive additional notifications about the 305/786 NPA Relief project.

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

Sincerely,

*Cecilia McCabe*  
NPA Relief Planner  
NANPA

cc: Sakina Deas – Florida Public Service Commission Staff

**FLORIDA 305/786 NPA  
INITIAL RELIEF PLANNING MEETING  
VIA WEB CONFERENCE**

**November 8, 2021 - 1:00 PM (ET)**

**AGENDA**

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review 305/786 & 754/954 NPA Background and History

Review 305/786 and 754/954 NPA Status

Review Initial Planning Document and Proposed Alternatives

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.

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## 5. NPA Relief Planning Process

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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.<sup>1</sup>
- 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.<sup>2</sup> 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

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<sup>1</sup> Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

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

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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



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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<sup>3</sup>. 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.
- 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 10 business days of the conference call.

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<sup>3</sup> 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.

## **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**

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 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.

### **5.6.2**

Where NPA relief is required for a single NPA area and 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 petition requesting 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 two months in advance of a conference call scheduled to review and approve the draft petition. 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 two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local<sup>4</sup> and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted

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<sup>4</sup> As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

exhaust (see Section 5.1). 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.

**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 dialing<sup>5</sup>, 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.

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**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 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**

<sup>5</sup> For example, FCC 20-100, ¶153.

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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.<sup>6</sup> 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

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<sup>6</sup> 47 CFR §52.19 (c) (3) (ii).

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.

### 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.<sup>7</sup> 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.<sup>8</sup>

### 6.4 Other

A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple 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.

<sup>7</sup> 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶¶67-94.

<sup>8</sup> See FCC 01-362 ¶¶ 81-94.

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## 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)

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## Annex E

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### General Attributes of the Most Common Relief Alternatives

Geographic Splits	All-Services Overlays
<ul style="list-style-type: none"> <li>Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area.</li> </ul>	<ul style="list-style-type: none"> <li>With an overlay there will be more than one area code in a geographic area.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will not require existing customers to change their area code.</li> </ul>
<ul style="list-style-type: none"> <li>Geographic splits permit 7-digit dialing within an area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>Future splits will reduce the geographic size of the area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.</li> </ul>

## 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



## Relief Planning Meeting Aid

### 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.

Relief Planning Meeting Aid

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.



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:**

		<b>Responsibility</b>
	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.	
	<b>After Permissive 7 and 10-Digit Dialing Begins</b>	
	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	

Relief Planning Meeting Aid  
Customer Education and Technical Milestones

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**Technical Milestones:**

		<b>Responsibility</b>
	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	
	<b><u>E911 Work Plan</u></b>	
	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 (1 <sup>st</sup> and 2 <sup>nd</sup> Notification)	
	15 Review and Submit CLEC Trunk Order Requests to local provider if needed	
	16 Update PSAP equipment	

Relief Planning Meeting Aid  
Customer Education and Technical Milestones

		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	

### FL 305/786 NPA Code Holder List

Company	OCN	CountOfNXX
ABC PAGING CITY BEEPERS, INC.	6548	45
AIRUS, INC. - FL	484H	3
AMERICAN MESSAGING SERVICES, LLC	9748	13
AMERIPAGE, INC.	6911	1
AT&T - LOCAL	7421	4
AT&T CORP.	516C	17
BANDWIDTH.COM CLEC, LLC - FL	982E	49
BARR TELL USA, INC. - FL	305H	4
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	416
BRIGHTLINK COMMUNICATIONS, LLC	478J	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	70
CENTURYLINK COMMUNICATIONS, LLC	508J	1
COMCAST IP PHONE, LLC	318J	17
COMMIO, LLC	939H	1
CORETEL FLORIDA, INC. - FL	481F	4
CSC WIRELESS, LLC	425J	1
DELTACOM, INC. - FL	4616	10
DIGITALIPVOICE, INC. - FL	520F	1
DSL INTERNET CORPORATION - FL	9264	4
EXIANT COMMUNICATIONS LLC	114J	1
FRACTEL, LLC	965H	13
FUSION CLOUD SERVICES, LLC	018A	4
FUSION CLOUD SERVICES, LLC	206A	5
FUSION CLOUD SERVICES, LLC	2720	1
FUSION CLOUD SERVICES, LLC	2721	1
FUSION CLOUD SERVICES, LLC	8368	2
FUSION COMMUNICATIONS, LLC	700E	1
GETGO COMMUNICATIONS LLC - FL	269H	1
GLOBAL CROSSING LOCAL SERVICES, INC. - FL	2547	4
HD CARRIER LLC	321J	2
IDT AMERICA CORP. - FL	765A	5
INTEGRATED PATH COMMUNICATIONS, LLC - FL	010H	3
INTRADO COMMUNICATIONS, LLC	813C	1
INVOXIO INCORPORATED	158H	2
IP HORIZON LLC	515J	1
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	35
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	3
LOCAL ACCESS LLC - FL	965G	3

### FL 305/786 NPA Code Holder List

MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	23
METROPCS, INC.	5562	97
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	136
OMNIPOINT MIAMI E LICENSE, LLC	6889	133
ONVOY SPECTRUM, LLC	624H	4
ONVOY, LLC - FL	937C	28
OPTICAL TELECOMMUNICATIONS, INC. - FL	480D	2
PAETEC COMMUNICATIONS, INC. - FL	4227	14
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	13
PROTECTION PLUS THE FL KEYS DBA ENGAGE COMM - FL	971D	1
RADIANTIQ LLC	566J	4
RCLEC, INC.	156J	1
RIGHT CALL LLC	365J	4
SIMWOOD, INC.	600J	1
SKYE TELECOM LLC DBA SKYETEL	622J	1
SMARTEDGENET, LLC	159H	1
SPRINT SPECTRUM, L.P.	6664	102
STRATUS NETWORKS	495J	1
TALKIE COMMUNICATIONS, INC. - FL	886H	1
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	24
TERRA NOVA TELECOM, INC. - FL	382G	2
TON80 COMMUNICATIONS, LLC	516J	1
US LEC OF FLORIDA, INC.	8692	8
USA MOBILITY WIRELESS, INC.	6630	50
VOIP INNOVATIONS, LLC	597F	2
VONAGE AMERICA LLC	197D	1
WAVENATION, LLC	700J	1
WHITESKY COMMUNICATIONS, LLC	553J	1
WIDE VOICE, LLC - FL	704G	2
WINDSTREAM NUVOX, INC.	8660	7
WINDSTREAM NUVOX, INC. - FL	4085	18
XO FLORIDA, INC.	6100	33
YMAX COMMUNICATIONS CORP. - FL	594D	4

### Block holders with No CO Codes Assigned

Company	OCN
TELNYX LLC	073H
TWILIO INTERNATIONAL, INC.	506J

### FL 754/954 NPA Code Holder List

Company	OCN	CountOfNXX
ABC PAGING CITY BEEPERS, INC.	6548	21
AIRESPRING, INC.	996H	1
AMERICAN MESSAGING SERVICES, LLC	6483	1
AMERICAN MESSAGING SERVICES, LLC	9748	8
AT&T - LOCAL	7421	7
AT&T CORP.	516C	8
BANDWIDTH.COM CLEC, LLC - FL	982E	26
BARR TELL USA, INC. - FL	305H	1
BATCHLINK, INC. - FL	400J	1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417	277
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - FL	6502	38
CENTURYLINK COMMUNICATIONS, LLC	508J	2
COMCAST IP PHONE, LLC	318J	17
CORETEL FLORIDA, INC. - FL	481F	1
DELTACOM, INC. - FL	4616	4
DIGITALIPVOICE, INC. - FL	520F	1
EWART TECHNOLOGIES INC DBA ISLECALL COMM	517J	1
FRACTEL, LLC	965H	12
FUSION CLOUD SERVICES, LLC	018A	7
FUSION CLOUD SERVICES, LLC	206A	2
FUSION CLOUD SERVICES, LLC	2721	4
GLOBAL CROSSING LOCAL SERVICES, INC. - FL	2547	5
INTEGRATED PATH COMMUNICATIONS, LLC - FL	010H	1
INTRADO COMMUNICATIONS, LLC	813C	1
INVOXIO INCORPORATED	158H	1
LEVEL 3 COMMUNICATIONS, LLC - FL	4802	25
LEVEL 3 TELECOM OF FLORIDA, LP - FL	7635	4
LOCAL ACCESS LLC - FL	965G	1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - FL	8664	18
METROPCS, INC.	5562	37
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	76
OMNIPOINT MIAMI E LICENSE, LLC	6889	61
ONVOY SPECTRUM, LLC	624H	5
ONVOY, LLC - FL	937C	27
PAETEC COMMUNICATIONS, INC. - FL	4227	13
PAGESTAR	6770	1
PEERLESS NETWORK OF FLORIDA, LLC - FL	902E	4
PROTECOM ATLANTA, INC.	6612	1



### FL 754/954 NPA Code Holder List

R AND G DISTRIBUTOR'S	6841	1
RIGHT CALL LLC	365J	1
SPRINT SPECTRUM, L.P.	6664	65
TELEPORT COMMUNICATIONS AMERICA, LLC - FL	8300	25
TELNYX LLC	073H	2
TERRA NOVA TELECOM, INC. - FL	382G	6
TON80 COMMUNICATIONS, LLC	516J	2
TWILIO INTERNATIONAL, INC.	506J	1
US LEC OF FLORIDA, INC.	8692	8
USA MOBILITY WIRELESS, INC.	6630	26
VOIP INNOVATIONS, LLC	597F	2
VONAGE AMERICA LLC	197D	2
WINDSTREAM NUVOX, INC.	8660	4
WINDSTREAM NUVOX, INC. - FL	4085	29
XO FLORIDA, INC.	6100	14
YMAX COMMUNICATIONS CORP. - FL	594D	4

### Block holders with No CO Codes Assigned

Company	OCN
TELNYX LLC	073H
FUSION CLOUD SERVICES, LLC	2720
HD CARRIER LLC	321J
BRIGHTLINK COMMUNICATIONS, LLC	478J
IP HORIZON LLC	515J
WHITESKY COMMUNICATIONS, LLC	553J
RADIANTIQ LLC	566J
FUSION COMMUNICATIONS, LLC	700E
WIDE VOICE, LLC - FL	704G
IDT AMERICA CORP. - FL	765A
DSL INTERNET CORPORATION - FL	9264
COMMIO, LLC	939H
TWILIO INTERNATIONAL, INC.	506J

### 305/786 NPA FL Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
305/786	HOMESTEAD	HOMESTEAD
305/786	KEYS	KEYS
305/786	MIAMI	MIAMI
305/786	NORTH DADE	NORTH DADE
305/786	PERRINE	PERRINE

### FL 754/954 NPA Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
754/954	CORAL SPG	CORAL SPRINGS
754/954	DEERFLDBCH	DEERFIELD BEACH
754/954	FTLAUDERDL	FORT LAUDERDALE
754/954	HOLLYWOOD	HOLLYWOOD
754/954	POMPANOCH	POMPANO BEACH



**THOUSANDS-BLOCK STATISTICS**

<b>ST/NPA:</b>	<b>FL 305/786</b>	<b>FL 754/954</b>
<b>MEETING DATE:</b>	<b>11/8/2021</b>	<b>11/8/2021</b>
<b>POOL START DATE (PSD)</b>	<b>5/28/2001</b>	<b>2/5/2001</b>
<b>RATE CENTERS</b>		
<i># Total</i>	<b>5</b>	<b>5</b>
<i># Mandatory</i>	<b>5</b>	<b>5</b>
<i># Mandatory-Single Service Providers (M*)</i>	<b>0</b>	<b>0</b>
<i># Optional</i>	<b>0</b>	<b>0</b>
<i># Excluded</i>	<b>0</b>	<b>0</b>
<b>BLOCKS ASSIGNED</b>		
<i># Total</i>	<b>618</b>	<b>385</b>
<i>(For time period 10/01/20 -10/13/21)</i>		
<b>BLOCKS AVAILABLE</b>		
<i>#Total</i>	<b>13</b>	<b>21</b>
<i>(As of preparation date: 10/13/21)</i>		
<b>CODES ASSIGNED</b>		
<i># Total</i>	<b>57</b>	<b>36</b>
<i># for Pool Replenishment</i>	<b>49</b>	<b>33</b>
<i># for Dedicated Customers</i>	<b>0</b>	<b>1</b>
<i># for LRNs</i>	<b>8</b>	<b>2</b>
<i>(For time period 10/01/20 - 10/13/21)</i>		
<b>CODES FORECASTED</b>		
<i># Total</i>	<b>30</b>	<b>16</b>
<i># for Pool Replenishment and Dedicated Customers</i>	<b>30</b>	<b>16</b>
<i># for LRNs</i>	<b>0</b>	<b>0</b>
<i>(For the next twelve months as of: 10/13/21)</i>		

Initial Planning Document  
For  
Relief of Florida 305/786 NPA  
November 8, 2021

North American Numbering Plan Administrator

Cecilia McCabe  
NPA Relief Planner

## **Background Information for the 305/786 Relief Project**

### **Relief Planning Background and Assumptions:**

#### **305/786 NPA Background:**

The 305 NPA was one of the original area codes created in 1947, and originally covered the entire state of Florida. The 786 NPA was added as an overlay to the 305 NPA in 1998. The overlay originally covered only Miami-Dade County and was expanded to include the Keys in 2014.

The 305/786 NPA overlay complex serves Miami-Dade County and a portion of Monroe County and includes communities such as Miami, Homestead and the Florida Keys as well as other smaller communities. The 305/786 NPA is bordered on the north by the 754/954 overlay complex, south and east by the Atlantic Ocean and to the west by the 239 NPA.

#### **754/954 NPA Background:**

The 954 NPA was split from the 305 NPA on September 11, 1995. The 954 NPA covers Fort Lauderdale and Broward County. On October 20, 2000, the Florida Public Service Commission approved an all-services overlay of the 954 NPA that serves Broward County (Ft. Lauderdale), Florida. The 754 NPA was added as an overlay to the 954 NPA area in phases. The first phase began on August 1, 2001.

#### **305/786 CO Code Summary:**

As of October 13, 2021, the 305 NPA has 768 codes assigned, 13 codes available for assignment and 19 Un-Assignable codes. The 786 NPA has 708 codes assigned, 77 codes available for assignment and 15 Un-Assignable codes. There are 72 service provider OCNs that are code holders in the 305/786 NPAs and two OCNs that are only thousands-block holders in the 305/786 NPAs.

#### **754/954 CO Code Summary:**

As of October 13, 2021, the 754 NPA has 146 codes assigned, 621 codes available for assignment and 33 Un-Assignable codes. The 954 NPA has 767 codes assigned, 12 codes available for assignment and 21 Un-Assignable codes. There are 54 service provider OCNs that are code holders in the 754/954 NPAs and 11 OCNs that are only thousands-block holders in the 754/954 NPAs.

#### **Exhaust Forecasts:**

The April 2021 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“April 2021 NRUF Report”), published by NANPA, indicated that the 305/786 NPA complex was projected to exhaust during the fourth quarter of 2024. Relief planning for an additional overlay NPA was to start in the fourth quarter of 2021. On September 23, 2021, NANPA issued a revised exhaust forecast, moving the projected exhaust forecast date to the first quarter of 2024 and this date is included in the October 2021 NRUF and NPA Exhaust Analysis Report (“October 2021 NPA Exhaust Analysis Report”), published by NANPA on October 14, 2021.

The October 2021 NPA Exhaust Analysis Report indicates that the projected exhaust date for the 754/954 NPA is first quarter 2047.

<b>NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 305/786 NPA</b>	
PROJECTED EXHAUST DATE.....	1Q2024
ANNUALIZED CODE DEMAND PROJECTION.....	41
MONTHLY CO CODE DEMAND PROJECTION.....	34
NXX Assignment Data .....	September 2021
Projected Life of Overlay.....	19 years

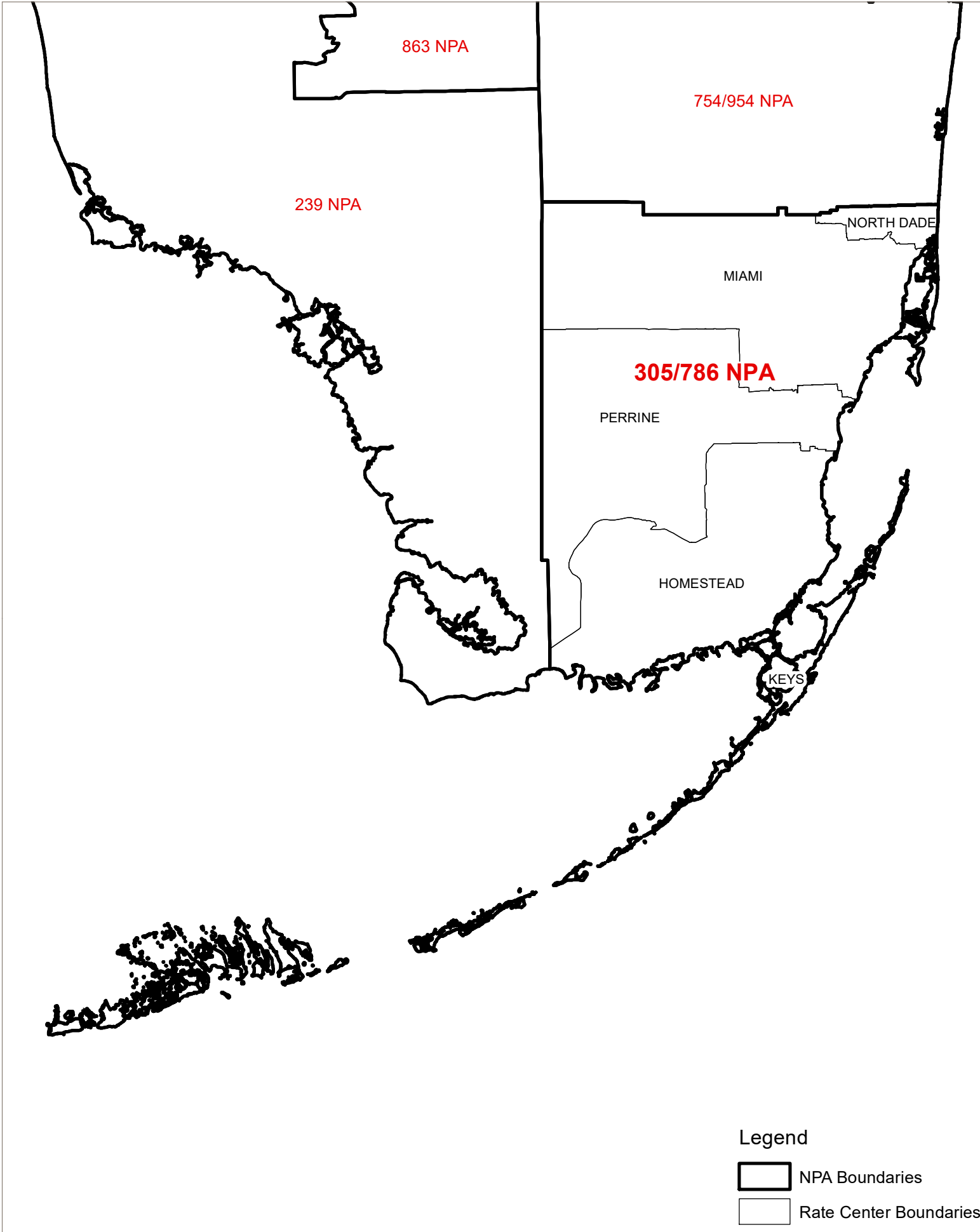
**Jeopardy:**

NANPA declared Jeopardy for the 305/786 NPA on September 23, 2021, and interim Jeopardy procedures were placed into effect. NANPA convened an industry meeting on October 13, 2021, and the industry reached consensus on final jeopardy procedures which went into effect on the same day. Under the final procedures, four (4) requests per OCN can be submitted each month and four (4) CO Codes are allocated each month. The Industry set a trigger: If less than 35 CO codes have been assigned following the September 2022 lottery, NANPA will reconvene the industry to revisit the jeopardy procedures.



**CURRENT DIALING PLAN**

<b>Type of Call</b>	<b>Call Terminating in</b>	<b>Dialing Plan</b>
Local call	Home NPA (HNPA) 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)





Legend

-  NPA Boundaries
-  Rate Center Boundaries

# 305/786 NPA - RELIEF ALTERNATIVES

## FLORIDA

Numbering Plan Area Born on Date: 1947

### NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE..... October 2021  
PROJECTED EXHAUST DATE.....1Q2024  
ANNUALIZED CODE DEMAND PROJECTION.....41  
MONTHLY CO CODE DEMAND PROJECTION.....3.4  
NXX Assignment data .....September 2021

### CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) 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 305/786 NPA overlay complex. Customers would retain their current telephone numbers. 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 305/786 NPA overlay complex have been exhausted. At exhaust of the 305/786 NPA overlay complex all future code assignments will be made in the new NPA. The projected life would be:

Total CO Codes 305 NPA= 768  
Total CO Codes 786 NPA= 708  
Total Rate Centers = 5  
Area Code Life in Years = 19 years

**ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY**

The boundary between the existing 305/786 NPA and 754/954 NPA codes would be eliminated and the 305/786 and 754/954 NPAs would be assigned to the same geographic areas occupied by the existing 305/786 and 754/954 NPAs. The 305/786 NPA and 754/954 NPA customers would retain their current telephone numbers. Available central office codes in the 754/954 NPA will be assigned upon request in the 305/786 NPA area with the effective date of the new area code boundary and available 305/786 NPA central office codes could be assigned upon request in the 754/954 NPA area. At exhaust of the 305/786 NPA, all future NXX code assignments will be made from the 754/954 NPA code supply of central office codes. The 754/954 NPA overlay complex has five rate centers and the projected exhaust is 1Q2047. Eliminating the boundary between the 305/786 NPA and 754/954 NPA would have a combined life of 10 years and would save one NPA. This relief option would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995. The projected life would be:

<b><u>305/786 NPA</u></b>	<b><u>754/954 NPA</u></b>
Total CO Codes 305 NPA = 768	Total CO Codes 754 NPA = 146
Total CO Codes 786 NPA = 708	Total CO Codes 954 NPA = 767
Total Rate Centers = 5	Total Rate Centers = 5

Combined Area Code Life in Years = 10 years

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

The boundary between the existing 305/786 NPA and 754/954 NPA area would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 305/786 and 754/954 NPAs with the effective date of the new area code boundary. The 305/786 NPA and 754/954 NPA customers would retain their current telephone numbers. Available central office codes in the 754/954 will be assigned upon request in the 305/786 NPA area with the effective date of the new area code boundary and available 305/786 NPA CO codes could be assigned upon request in the 754/954 NPA area. At exhaust of the 305/786 and 754/954 NPAs all future code assignments will be made from the new overlay NPA. Eliminating the boundary between the 305/786 and 754/954 NPAs and adding an all services overlay over both geographic areas would have a combined life of 22 years. This relief option would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995. The projected life would be:

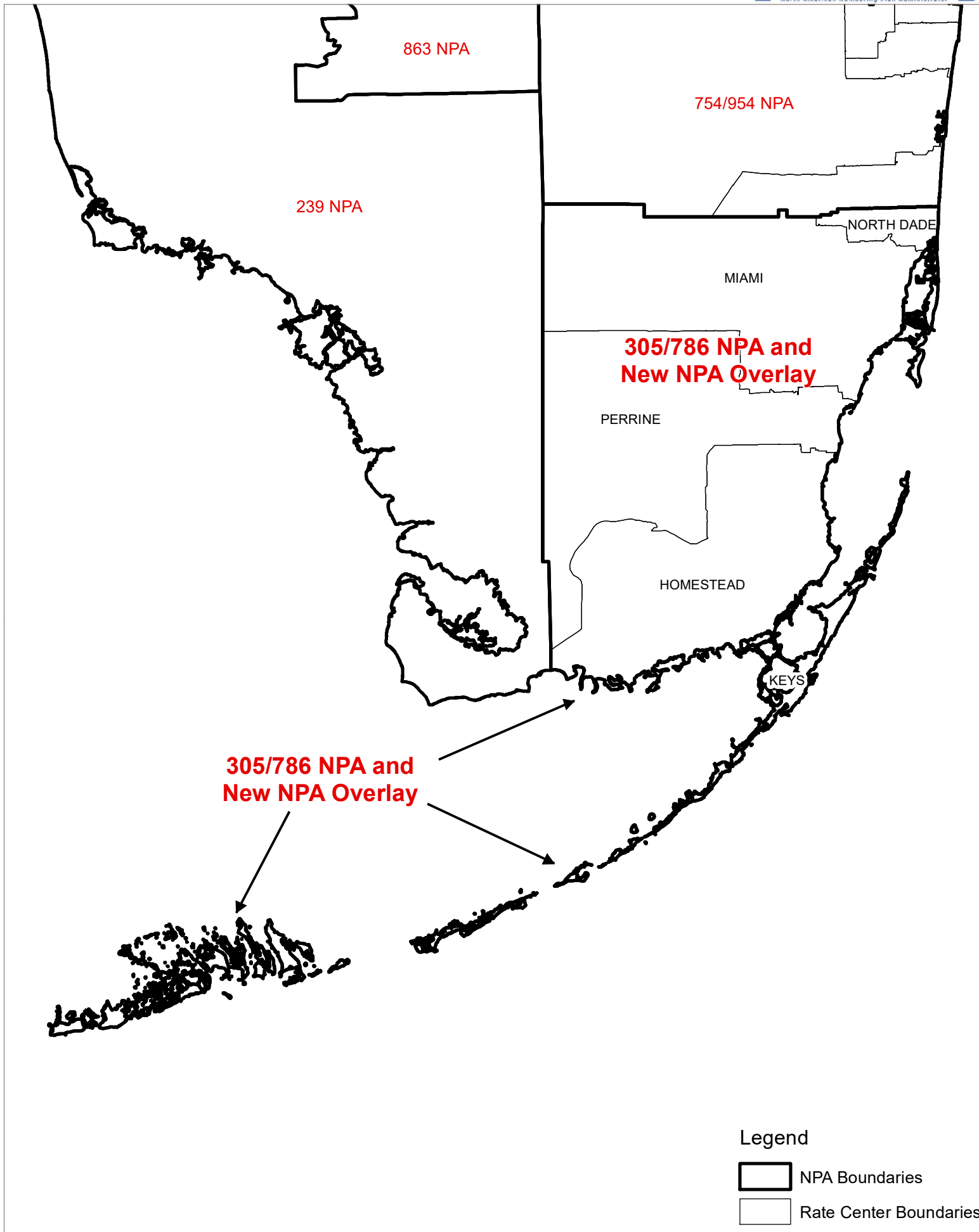
<b><u>305/786 NPA</u></b>	<b><u>754/954 NPA</u></b>
Total CO Codes 305 NPA = 768	Total CO Codes 754 NPA = 146
Total CO Codes 786 NPA = 708	Total CO Codes 954 NPA = 767
Total Rate Centers = 5	Total Rate Centers = 5

Combined Area Code Life in Years = 22 years

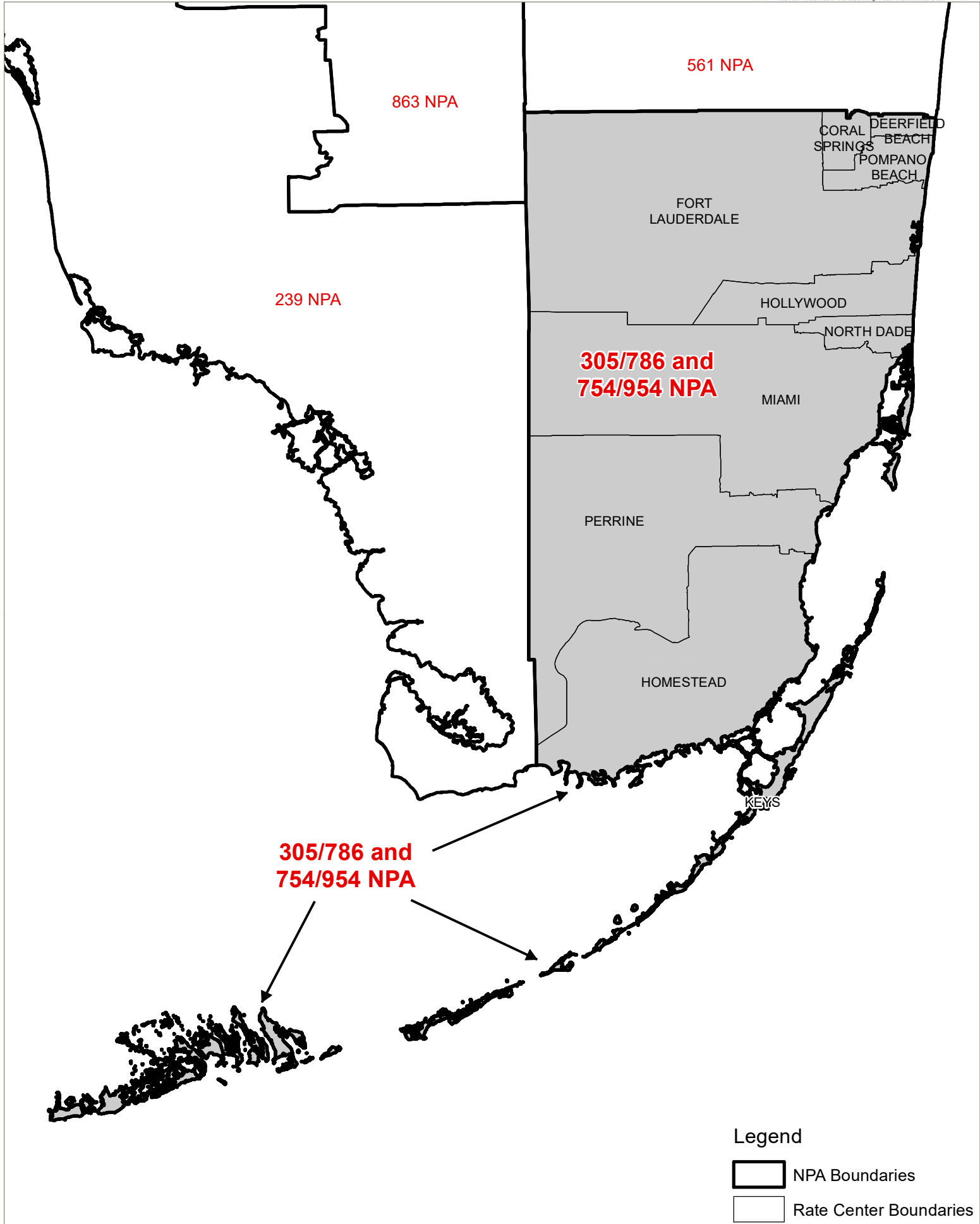
GEOGRAPHIC SPLIT ALTERNATIVE
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Per Section 5.6.1 of the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061) an overlay is the only relief option of the 305/786 NPA.

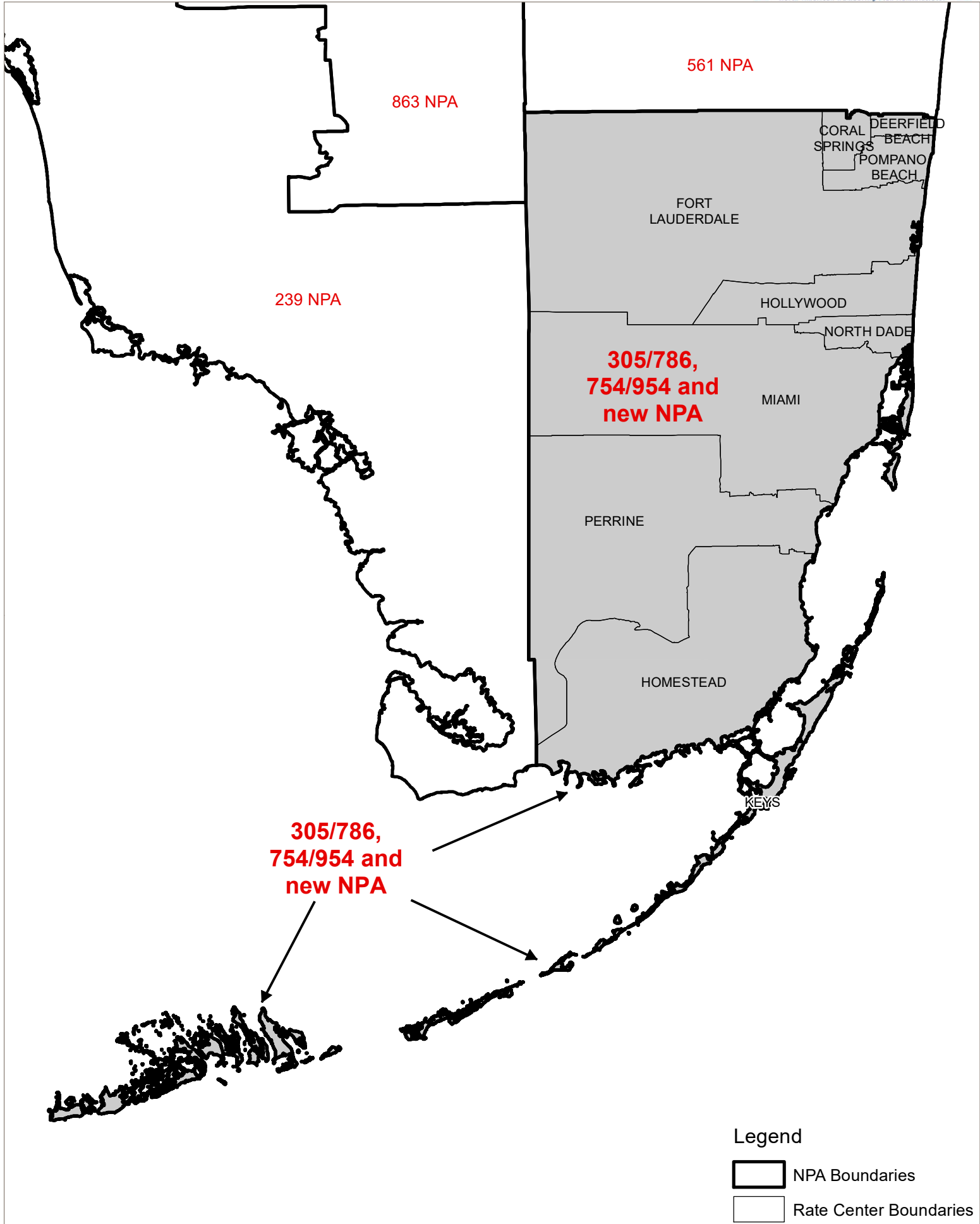
*Where NPA relief is required for an existing overlay complex, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing requesting approval of the overlay and recommending an implementation schedule 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.*



Alternative #2 Boundary Elimination Overlay of 305/786 NPA and 754/954 NPA



Alternative #3 Boundary Elimination Overlay of 305/786, 754/954 and new NPA



# EXHIBIT B





November 29, 2021

To: All 305/786 NPA Code Holders and Interested Industry Members (Florida)

Subject: Final Minutes of the Initial Relief Planning Meeting for the 305/786 NPA

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Attached are the final minutes from the November 8, 2021, Florida 305/786 NPA Initial Relief Planning meeting. These meeting minutes became final on November 29, 2021 with no additional edits.

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

Sincerely,

*Cecilia McCabe*  
NPA Relief Planner  
NANPA

cc: Sakina Deas – Florida Public Service Commission Staff

**FLORIDA 305/786 NPA  
Initial Relief Planning Meeting  
Via Web Conference  
FINAL Minutes  
November 8, 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.

**NANPA's ROLE AND RESPONSIBILITIES**

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

- 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. Jeopardy was declared on September 23, 2021, and the meeting notice for the initial planning meeting was sent out on October 18, 2021.
- Then, the main objective is achieved by reaching consensus on the relief alternative to be included in the relief filing with the Florida Public Service Commission (Commission).
- Also determine any additional items to include in a filing such as dialing plan, implementation intervals and compliance with any state-specific requirements.
- Then NANPA is charged with the responsibility of filing a relief petition on behalf of the industry with the Commission. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting per the INC guidelines or as decided by the industry or as required by the state statute.

**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, 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.

An overlay is the only option for relief of the 305/786 NPA, per Section 5.6.1 of the Industry Numbering Committee's NPA Code Relief Planning and Notifications Guidelines (ATIS-0300061; "the Guidelines) which state:

*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.*

However, Cecilia stated that NANPA has determined that more than one overlay alternative is available as a viable relief option for the 305/786 NPA.

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.*

Included in the meeting notice are sections of the Guidelines pertaining to relief planning, which Cecilia stated the Guidelines could be found on the ATIS web site [www.atis.org](http://www.atis.org).

Cecilia also reviewed:

- 305/786 NPA Code Holder Table
- 754/954 NPA Code Holder Table
- Rate Center Table for the 305/786 NPA
- Rate Center Table for the 754/954 NPA
- Map of the 305/786 NPA

## **NPA STATUS**

**Jeopardy Declaration and Exhaust Forecast:** On September 23, 2021, NANPA declared jeopardy in the 305/786 NPA. Final Jeopardy procedures were set on October 13, 2021, and the rationing amount was set at four (4) Central Office (CO) code requests per Operating Company Number (OCN) allocated per month. A trigger was also established to reconvene the industry if less than 35 CO codes have been assigned following the September 2022 lottery. The October 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2021 NRUF Report"), published by NANPA, indicated that the 305/786 NPA would exhaust during the first quarter of 2024.

As of November 7, 2021, the 305 NPA has 768 CO codes assigned, 13 CO codes available for assignment, and 19 unavailable CO codes. The 786 NPA has 708 CO codes assigned, 77 CO codes available for assignment, and 15 unavailable CO codes. There are 74 service providers in the 305/786 NPA: 72 CO code holders and two (2) OCNs that only have thousands-blocks.

As of November 7, 2021, the 754 NPA has 146 CO codes assigned, 621 CO codes available for assignment, and 33 unavailable CO codes. The 954 NPA has 767 CO codes assigned, 10 CO codes available for assignment, and 21 unavailable CO codes. There are 67 service providers: 54 CO code holders and 13 OCNs that only have thousands-blocks. The October 2021 NRUF and NPA Exhaust Analysis projects the exhaust of the 754/954 NPA during the first quarter of 2047 (1Q2047). (See Attachment #2)

### **THOUSANDS-BLOCK INFORMATION**

Cecilia reported that in the 305/786 NPA pooling commenced on May 28, 2001, there are five (5) rate centers, and all are mandatory for pooling. From November 1, 2020 through November 7, 2021, 601 thousands-blocks have been assigned and as of November 7, 2021, there is one (1) thousands-block available for assignment to service providers. Pooling has assigned 56 CO codes in the same period; 48 for pool replenishment, and eight (8) for LRNs. The CO code forecasted demand for the next twelve months is 33 CO codes for pool replenishment and dedicated customers.

Cecilia reported that in the 754/954 NPA pooling commenced on February 5, 2001, there are five (5) rate centers, and all are mandatory for pooling. From November 1, 2020 through November 7, 2021, 401 thousands-blocks have been assigned and as of November 7, 2021, there are 14 thousands-blocks available for assignment to service providers. Pooling has assigned 38 CO codes in the same period; 34 for pool replenishment, two (2) for dedicated customers and two (2) for LRNs. The CO code forecasted demand for the next twelve months is 14 CO codes for pool replenishment and dedicated customers. (Attachment #3)

### **RELIEF PLANNING BACKGROUND AND ASSUMPTIONS**

#### **305/786 NPA Background:**

The 305 NPA was one of the original area codes created in 1947, and originally covered the entire state of Florida. The 786 NPA was added as an all-services distributed overlay to the 305 NPA in 1998. The overlay originally covered only Miami-Dade County and was expanded to include the Keys in 2014.

The 305/786 NPA overlay serves Miami-Dade County and a portion of Monroe County and includes communities such as Miami, Homestead and the Florida Keys as well as other smaller communities. The 305/786 NPA is bordered on the north by the 754/954 overlay complex, south and east by the Atlantic Ocean and to the west by the 239 NPA.

#### **754/954 NPA Background:**

The 954 NPA was split from the 305 NPA on September 11, 1995. The 954 NPA covers Fort Lauderdale and Broward County. On October 20, 2000, the Commission approved an all-services distributed overlay of the 954 NPA that serves Broward County (Ft. Lauderdale), Florida. The 754 NPA was added as an all-services distributed overlay to the 954 NPA area in phases with the first phase beginning on August 1, 2001.

## REVIEW OF RELIEF PLANNING ALTERNATIVES

Cecilia presented the following three (3) overlay options for relief of the 305/786 NPA:

### **ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY**

The new NPA would be assigned to the same geographic area occupied by the existing 305/786 NPA overlay. Customers would retain their current telephone numbers. 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 305/786 NPA overlay complex have been exhausted. At exhaust of the 305/786 NPA overlay, all future code assignments will be made in the new NPA. The projected life would be:

Area Code Life in Years = 19 years

Total CO Codes 305 NPA= 768

Total CO Codes 786 NPA= 708

Total Rate Centers = 5

### **ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY**

The boundary between the existing 305/786 NPA and 754/954 NPAs would be eliminated and the 305/786 and 754/954 NPAs would be assigned to the same geographic areas occupied by the existing 305/786 and 754/954 NPAs. The 305/786 NPA and 754/954 NPA customers would retain their current telephone numbers. Available CO codes in the 754/954 NPA will be assigned upon request in the 305/786 NPA area with the effective date of the new boundary and available 305/786 NPA central office codes could be assigned upon request in the 754/954 NPA area. The 754/954 NPA overlay complex has five rate centers and the projected exhaust is 1Q2047. Eliminating the boundary between the 305/786 NPA and 754/954 NPA would have a combined life of 10 years and would save one NPA. This relief option would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995. The projected life would be:

Combined Area Code Life in Years = 10 years

#### **305/786 NPA**

Total CO Codes 305 NPA = 768

Total CO Codes 786 NPA = 708

Total Rate Centers = 5

#### **754/954 NPA**

Total CO Codes 754 NPA = 146

Total CO Codes 954 NPA = 767

Total Rate Centers = 5

**ALTERNATIVE #3 - BOUNDARY ELIMINATION OVERLAY WITH THE ADDITION OF A NEW OVERLAY NPA**

The boundary between the existing 305/786 NPA and 754/954 NPA area would be eliminated and a new NPA code would be assigned to the same geographic area occupied by the existing 305/786 and 754/954 NPAs with the effective date of the new boundary. The 305/786 NPA and 754/954 NPA customers would retain their current telephone numbers. Available CO codes in the 754/954 will be assigned upon request in the 305/786 NPA area with the effective date of the new boundary and available 305/786 NPA CO codes will be assigned upon request in the 754/954 NPA area. At exhaust of the 305/786 and 754/954 NPAs all future CO code assignments will be made from the new overlay NPA. Eliminating the boundary between the 305/786 and 754/954 NPAs and adding a new all-services distributed overlay over both geographic areas would have a combined life of 22 years. This relief option would also reunite the 305 and 954 NPAs that were previously part of an NPA split that occurred in 1995. The projected life would be:

Combined Area Code Life in Years = 22 years

**305/786 NPA**

Total CO Codes 305 NPA = 768  
Total CO Codes 786 NPA = 708  
Total Rate Centers = 5

**754/954 NPA**

Total CO Codes 754 NPA = 146  
Total CO Codes 954 NPA = 767  
Total Rate Centers = 5

**GEOGRAPHIC SPLIT ALTERNATIVE**

Per Section 5.6.1 of the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061) an overlay is the only relief option of the 305/786 NPA.

*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.*

**CONSENSUS ON RELIEF ALTERNATIVE**

There was discussion on the relief alternative to be recommended to the Commission and the industry reviewed a list of pros and cons for the relief alternatives. A proposal was made, and consensus was reached among the industry members, to recommend Alternative #1, the all-services distributed overlay. It was stated that because the 305/786 NPA is in Jeopardy, an all-services distributed overlay can be implemented more quickly than the other relief alternatives presented, and it would be less confusing to customers.

The all-services distributed overlay will be included as the industry’s recommended method of relief in the petition filed with the Commission.

Listed below are the pros and cons the Industry reached consensus on for each relief alternative. Review of those pros and cons assisted the Industry with reaching consensus on the method of relief to be recommended to the Commission.

**Alternative #1 All-Services Distributed Overlay**

**Pros:**

Alternative # 1	
1. All existing customers would retain the 305/786 area code and would not have to change their telephone numbers.	
2. Less customer confusion and easier education process.	
3. Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth.	
4. Easier for service providers to implement from a translations, billing and service order system perspective.	
5. Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table	
6. Keeps communities of interest intact.	
7. An all services overlay is simpler than the boundary elimination overlay to implement from both a technical and customer education perspective.	

**All-Services Distributed Overlay:**

**Cons:**

Alternative # 1	
1. Slightly shorter relief life than the boundary elimination overlay with the addition of the new NPA overlay (Alternative #3).	

**Boundary Elimination Overlay Pros:**

Alternative #		
#2	#3	
X		1 Eliminates need to open new NPA
X	X	2 Does not require customers to change their area code.

**Boundary Elimination Overlay Cons:**

Alternative #		
#2	#3	
X		1 Boundary elimination alternatives have shorter lives than the all-services overlay
X	X	2 Impacts a larger quantity of customers than the all-services overlay over only the 305/786 NPA.
X	X	3 A more complex customer education process, which could lead to increased customer confusion.
X	X	4 Requires more technical work and time to implement based on the number of NPAs impacted. Alternative #2 and #3 would require work on a larger quantity of switches than Alternative #1 due to having to implement an overlay in four NPAs.

**CURRENT DIALING PLAN AND IMPLEMENTATION INTERVALS**

The following dialing plan is in place for 305/786 NPA and will not change because 10-digit local dialing is already in place. A recommendation was made, and consensus was reached, to include a footnote stating that 1+10-digit dialing is permissible at each service provider’s discretion for local calls.

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

A recommendation was made, and consensus was reached to recommend to the Commission a 9-month schedule for implementation of the all-services distributed overlay with the new NPA being effective 6-months prior to the forecasted exhaust of the 305/786 NPA. Since mandatory 10-digit local dialing is already in place, there will not be a permissive dialing period. The recommended schedule is as follows:



EVENT	TIMEFRAME
Customer Education and Network Preparation Period	9 Months
Effective date of the new NPA (and earliest possible CO code activation) *	At the completion of customer education and network preparation period (6 months prior to exhaust)

\* CO codes in the new NPA will not be assigned until all available codes in the 305/786 NPA have been exhausted.

There was additional discussion regarding the implementation schedule, and it was stated that if an alternative other than the all-services distributed overlay (alternative #1) is chosen by the Commission, then a longer implementation time frame would be needed.

### CUSTOMER EDUCATION PLAN

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 all-services distributed overlay.

#### Customer Milestones:

	<b>Responsibility</b>
1 Single customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
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 Directory Publishers	Co-chairs of industry committee
4 Update social media with information regarding additional overlay	All Service Providers (optional)
5 Update websites with information regarding additional overlay	All Service Providers
6 Develop language for use in Directories to alert the consumers of the new area code.	Service Providers that publish directories
7 Issue second press release	FL Commission; Service Providers to the extent they are able to do so

**Technical Milestones:**

	<b>Responsibility</b>
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 Establish NPA Specific type of Trunks	All Service Providers (as needed)
<b><u>E911 Work Plan</u></b>	
4 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
5 Ensure SRDB table has new NPA built in	E911 Providers
6 Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
7 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
8 Update PSAP equipment to recognize new NPA	PSAPs
9 Trunk Orders Complete	E911 Providers
10 Build E911 Network/Tandem Translations	E911 Providers
11 Verify if all PSAP work has been completed	PSAPs
12 Activate E911 Network/Tandem Translations	E911 Providers

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

**STATEMENTS FOR THE RECORD**

There were no statements for the record.

**NANPA FILING INDUSTRY EFFORTS WITH COMMISSION**

Consensus was reached that NANPA will file the petition for relief with the Commission informing them of the outcome of this relief planning meeting. The INC guidelines require the petition be filed within 6-weeks (December 20, 2021) of the relief planning meeting unless otherwise decided by the Industry. NANPA will post a draft petition no later than November 19, 2021, and the Industry will reach consensus on the final petition at a meeting that will be scheduled for November 30, 2021.

**FL 305/786 NPA Relief Planning Meeting & Draft Petition Schedule**

November 19 – Draft Minutes Posted via NNS

November 29 – Meeting Minutes become Final

November 19 – Post Draft Petition via NNS

November 30 – Draft Petition Review Meeting at 1:00 PM Eastern

December 20 – File Petition with Florida Public Service Commission

**REVIEW OF DRAFT MEETING MINUTES**

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry no later than November 19, 2021. Any changes or corrections are to be submitted to Cecilia via [cmccabe@nanpa.com](mailto:cmccabe@nanpa.com) by November 29, 2021, when the minutes will become final.

The meeting was adjourned.

###

These minutes became final on November 29, 2021