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THIS COPY



BellSouth Telecommunications, Inc. Fax 904 272 8640
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150 South Monroe Street
Tallahassee, Florida 32301

Nancy H. Sims
Director - Regulatory Relations

February 14, 1997

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 961153-TL - Petition for Numbering Plan Area Relief
for 904 Area Code, by BellSouth Telecommunications, Inc.

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s information from Bellcore acting as NANP Administrator pertaining to the implementation of relief of the 904 Area Code.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy H. Sims

Nancy H. Sims

Enclosures

- cc: All Parties of Record
- A. M. Lombardo
- R. G. Beatty
- W. J. Ellenberg

RECEIVED & FILED

FPSC BUREAU OF RECORDS



DOCUMENT NUMBER-DATE

01661 FEB 14 97

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U. S. Mail this 14th day of February, 1997, to the following:

Stephen S. Mathues, Esq.
Office of General Counsel
Department of Management Services
4050 Esplanade Way, Suite 260
Tallahassee, FL 32399

Mark Herron, Esq.
E. Gary Early, Esq.
Akerman, Senterfitt & Eidson, P.A.
P.O. Box 10555
Tallahassee, FL 32302

William P. Cox
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Ausley & McMullen
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Tallahassee, FL 32301

Mary H. Smith

Bellcore

Bell Communications Research

Ronald R. Connor
 Director
 NANPA Administration

Bellcore
 6 Corporate Place, PYA-1F-275
 Piscataway, NJ 08854-4167
 908-699-3700 (phone)
 908-336-3293 (fax)
 rconnor@notes.cc.bellcore.com

February 12, 1997

R. Stan Washer
 NPA Code Administration
 North WIC1
 3535 Colonnade Parkway
 Birmingham, AL 35243

FEB 13 1997

FEDERAL RELATIONS
 TALLAHASSEE, FL

Dear Mr. Washer:

This is in response to your letter of February 10, 1997, in which BellSouth requests that NANPA assign two new NPA codes, 234 and 386, for relief of the exhausting 904 NPA in north Florida.

The relief plan ordered by the Florida Public Service Commission (FPSC) calls for a three way geographic split of the 904 NPA. The splits will be along LATA boundaries, such that the Pensacola, Panama City, and Tallahassee LATAs will retain the 904 NPA, and the Jacksonville and Daytona LATAs will become the new 234 and 386 NPAs, respectively. The projected lifetimes for the three NPAs established by the relief plan are as follows: Both the 904 and the 234 NPAs will exhaust in 2006. The 386 NPA (Daytona LATA), however, will not exhaust until 2030, 24 years after the exhaust of the other two NPAs. This is contrary to Section 4(h) of the *NPA Relief Planning Guidelines* which states that "severe imbalances, for example, a difference in NPA lifetimes of more than 15 years, shall be avoided." This is one of several criteria established by the Industry Numbering Committee (INC) after review of concerns raised about a previous relief plan for the 904 NPA. At that time NANPA assigned the 352 NPA code to relieve the impending exhaust of the 904 NPA, but expressed serious reservations about the effective use of the new code. At NANPA's suggestion, the INC modified the guidelines to encourage long term NPA planning, incorporating multiple relief activities in a relief plan, if justified.

Faced with a relief plan that contradicts the guidelines, NANPA asked the INC for direction. The INC responded that Section 2.10 of the guidelines specifies that regulatory entities have the ultimate authority to approve or reject NPA relief plans, and that NANPA may make the assignments. On the other hand, the INC participants expressed concerns that such assignments would be in direct conflict with accepted number conservation practices and contrary to the spirit and intent of the guidelines.

With this direction from the INC, NANPA is required to make the assignments as requested unless directed otherwise by the North American Numbering Council (NANC) or by the FCC. We understand the urgent need to proceed with relief planning in Florida, but we would be remiss in our duties as administrator if we did not allow time for the NANC to review the issue, particularly since the NANC has been charged to address conservation of numbering plan resources. We are therefore prepared to make the assignments as requested ten working days from the date of this letter, unless we are otherwise directed by the NANC or by the FCC.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

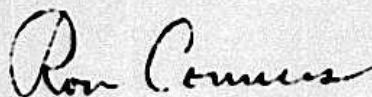
- 2 -

Assuming that the assignments are made, please be advised that the industry has requested that they be notified at least twelve months before the introduction of a new NPA code. To accomplish this notification, NANPA will issue a Planning Letter (PL) describing the details of the 904/234/386 three-way split, when they are received from BellSouth. The industry has requested that the following information be included in the PL:

- The old and new NPA codes
- A map of area affected
- A list of the communities affected by the NPA split
- A list of the central office codes (NXXs) to be in each NPA
- The exact *date and time* of new NPA activation
- The exact *date and time* of the end of the permissive dialing period
- The dialing plan for the new NPA
- A test number to the NPA, and the dates when it will be activated and deactivated
- A trouble reporting number that may be called in the event that calls cannot be completed to the new NPA
- NPA implementation coordinator names and telephone numbers
- Any other information relevant to the implementation of the new NPA

If you have any questions concerning this letter or the contents of the Planning Letter, please feel free to contact me or Jim Deak, who can be reached at 908-699-6612

Sincerely,



Copy to

Marian Gordon - FCC

Alan Hasselwander - NANC Chairman