



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: April 4, 1997
TO: Mr. Jeffrey Wahlen, Esquire
Mr. Mark Herron, Esquire
Ms. Nancy Sims
Mr. Steve Mathues, Esquire
Ms. Marsha Rule, Esquire
Mr. David Erwin, Esquire
FROM: Charles J. Pellegrini, Attorney *CJP*
RE: Docket No. 961153-TL - Petition for numbering plan area relief for 904 area code, by BellSouth Telecommunications, Inc.

I am enclosing copies of the eight letters that are to be considered at the hearing Wednesday, April 16, 1997.

CJP/js
enclosure
cc: B. Bayo
E:\memo.cjp

03534 AIR-40
FSC-REGULATORY REPORTING



Rowell R. Coover
Director
NANPA Administration

Bellcore
6 Corporate Plaza, P.O. 15878
Piscataway, NJ 08854-4187
908-499-3700 (general)
908-336-3293 (fax)
Return to Director or Bellcore.com

February 12, 1997

R. Stan Weber
NPA Code Administration
North WICI
3535 Colonnade Parkway
Birmingham, AL 35243

FEB 13 1997

Dear Mr. Wacker:

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 split 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 (INCC) 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 INCC 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 INCC for direction. The INCC 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 INCC 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 INCC, NANPA is required to make the assignments as requested unless directed otherwise by the North American Numbering Council (NANCC) 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 NANCC to review the issue, particularly since the NANCC has been charged to address conservation of numbering plan resources. We are therefore prepared to make the assignments as requested upon working days from the date of this letter, unless we are otherwise directed by the NANCC or by the FCC.

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 904/234/395 draw-
-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 (NXKs) 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 908-499-4612

Sincerely,



Copy to

Marian Gordon - FCC
Alan Huseelwunder - NANC Chairman



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Ronald R. Corners
Director
NANP Administration

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6 Corporate Place, PYA 1F275
Florahway, NJ 08854-4167
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rcorners@notes at bellcore.com

January 29, 1997

R. Stan Washer
NPA Code Administration
BellSouth Telecommunications, Inc.
North WICI
3535 Colonnade Pkwy
Birmingham, AL 35243

Dear Stan:

We are in receipt of your application for the assignment of two new NPA codes to be used to implement the three-way split of the 904 NPA as ordered by the Florida Public Service Commission. The split has been designed in such a way that the resulting 904 NPA and the first new NPA will exhaust in 2006, while the second new NPA will not exhaust until 2030.

Please be advised that we cannot make the assignment as requested because it would contradict Section 4.0 (h) of the NPA Relief Planning Guidelines (INC 94-1216-004), which says that "severe imbalances [in exhaust dates], for example, a difference in NPA lifetimes of more than 15 years, shall be avoided."

With your concurrence, we are prepared to raise this as a new issue with the Industry Numbering Committee which is meeting this week. Please advise us of your wishes.

Sincerely,

Copy to

Stan Groer - Florida PSC

February 24, 1997

Regina M. Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Ms. Keeney:

At the February 13 meeting of the North American Numbering Council there was substantial discussion concerning a request for two new area codes to accomplish a 3-way split to relieve 804 (Northern Florida). This request is a result of an order by the Florida Public Service Commission. Two of the codes are estimated to exhaust in 2008, while the third code would likely exhaust more than 20 years later. Current guidelines state that boundaries should be set so that codes exhaust at roughly the same time, but that in no event should there be more than 15 years difference in exhaust dates. The current NANPA asked for guidance from the INC in this matter, and the INC refused to accept the issue on the grounds that they could not countermand a state PSC even though an area code will possibly be wasted. The NANPA will assign the codes in a few days.

There is real concern that there will be similar requests in the very near future including potentially the use of "easily recognized codes". In fact following our NANC meeting on February 13 the NANPA received two additional requests, one from Utah and the other from California. The Utah plan involves a split of 801 in which 801 would be expected to exhaust in 8 years while the anticipated exhaust of the new 435 code is beyond the year 2025. In the case of proposed relief for the 408 code in California, 408 would exhaust in 3 1/2 to 4 years while the proposed 831 code would not exhaust for an estimated 27 to 32 1/2 years.

NANC has begun to consider its role in number conservation as suggested in the Report and Order in CC Docket No. 92-237. It is our belief that there is a high level of urgency to conservation issues in general and those specifically raised by the Northern Florida situation. I am therefore requesting guidance about how we should proceed in addressing such issues. It is our strong belief that questions arising out of the Florida area relief plan need to be addressed quickly.

Sincerely,



Alan C. Hesselwander

Chairman, NANC

cc: Kathleen B. Levitz

Geraldine Matise

Marian R. Gordon



Federal Communications Commission
Washington, D.C. 20554

March 14, 1997

Alan C. Hasselwander
Chairman, North American Numbering Council
4140 Clover Street
Honeoye Falls, New York 14472-9323

Dear Chairman Hasselwander:

I read with great interest your letters of February 24, 1997, and March 4, 1997, regarding the North American Numbering Council's (NANC's) concern with recently proposed area code assignments, and the NANC's role in number conservation. I am pleased to respond to your request for guidance on how NANC should proceed on these issues.

In your February 24th letter, you state that current industry guidelines call for setting area code boundaries so that codes for adjacent areas will exhaust at roughly the same time. You indicate that NANC is concerned that setting area code boundaries with significant disparity in exhaust dates for adjacent codes would lead to the inefficient use of telephone numbers and would be inconsistent with the goal of number conservation. You also indicate that NANC has begun to consider its role in number conservation as suggested in the Report and Order in the North American Numbering Plan Administration proceeding, CC Docket No. 92-237 (Numbering Administration Order). In your March 4th letter you provide information about three recent area code requests and reiterate NANC's concern about the implications for number conservation of these types of area code assignments. You also indicate that the NANC has begun reviewing industry numbering guidelines for specificity and completeness and that NANC intends to recommend revised guidelines to the Commission this fall.

I share the NANC's concern that number administration lead to conservation and efficient use of numbering resources. In the Numbering Administration Order, the Commission specifically directed the NANC to identify measures that should be taken to conserve numbering resources (para. 46, Number Administration Order). In that Order, the Commission also affirmed its policy that administration of the North American Numbering Plan (NANP) must facilitate entry into the communications marketplace by making numbering resources available on an efficient, timely basis to all service providers (emphasis added) (para. 15, Number Administration Order).

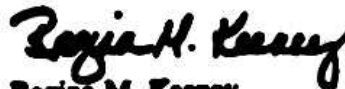
Chairman Alan Hasselwander

Page 2

I support the actions NANC has taken thus far to ensure that numbering resources are used in a manner consistent with the goal of number conservation. I also support the NANC's intent to review the industry numbering guidelines to ensure efficient use of numbering resources. I recognize that NANC attaches a high level of urgency to these issues, and I assure you that the Commission will consider seriously any recommendations or advice that NANC may offer regarding conservation of numbers.

Thank you once again for the impressive commitment and hard work displayed by the members of NANC under your leadership. We at the Commission look forward to learning more about NANC's continued efforts to help us ensure efficient assignment and conservation of numbers.

Sincerely,



Regina M. Keeney
Chief

Common Carrier Bureau



Ronald R. Conners
Director
NANPA Administration

Bellcore
6 Corporate Place, P.O. Box 15275
Princeton, NJ 08554-4157
609-696-3700 (phone)
609-336-3293 (fax)
rconner@notes.cc.bellcore.com

February 27, 1997

R. Stan Washer
NPA Code Administration
North W/CI
3535 Colonnade Parkway
Birmingham, AL 35243

Dear Mr. Washer:

This is a follow-up to my letter to you of February 12, 1997. My letter described North American Numbering Plan Administration's (NANPA's) concerns and those expressed by the industry about the conflict between the 904 Numbering Plan Area (NPA) relief plan and the conservation provisions of the NPA Relief Planning Guidelines. The letter also indicated that NANPA would delay assignment of the relief NPA codes for the 904 NPA by ten working days in order to provide time for the North American Numbering Council (NANC) and/or the Federal Communications Commission (FCC) to review the issue.

The issue was raised at the February 13 meeting of the NANC, and concerns were raised similar to those raised previously at the Industry Numbering Committee. As a result of that discussion, Alan Hasselwander, chair of the NANC, wrote to Julia Johnson, chair of the Florida Public Service Commission, on February 17, asking her to delay proceeding with the proposed relief plan. The issue was again discussed at the February 26 NANC meeting, but no one from Florida was present at the meeting. At that point the NANC agreed to seek the advice of the FCC. Based on that agreement, NANPA will further postpone assignment of the relief NPA codes for Florida for an additional thirty days in order to provide the FCC an opportunity to reply.

Both the NANPA and the NANC are aware of the imminent need for relief in the 904 NPA. As Mr. Hasselwander said in his letter to Julia Johnson, "It is not our intention to introduce significant delay in the solution to your exhaust problem..." On the other hand, the 904 NPA relief plan is precedent setting, and we have received two other requests to assign relief NPA codes for relief plans that violate the same provision of the NPA Relief Planning Guidelines.

Sincerely,

Ronald R. Conners
Copy to

Marian Gordon - FCC
Julia Johnson - Chair, Florida Public Service Commission
Alan Hasselwander - Chair, NANC

0140 Change B1
Plaza One Plaza, NY 10077-0001

February 28, 1997

Josephine Gallagher
Bell Atlantic Network Technologies
1310 N. Court House Road
Arlington, VA 22201

Dear Jo

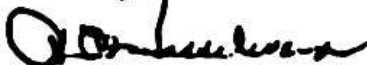
At the February 28 meeting of the North American Numbering Council the members decided to request that the Industry Numbering Committee review certain Numbering Guidelines in order to identify those areas within the Guidelines that contain ambiguities that have or might lead to difficulty in administration and application. The NANC requests that the INC remedy those identified areas that can be worked within the INC, and bring to the NANC for resolution those ambiguities which reflect unreconciled policy disputes. NANC requests that the INC report the results of its actions with respect to this matter at the NANC meeting scheduled for June 10, 1997 in Washington, D.C.

The Guidelines selected by NANC for your current consideration are the following

- NPA Allocation and Assignment Guidelines
- Central Office Code Assignment Guidelines
- Carrier Identification Code Assignment Guidelines

If you wish to discuss this request, please call me at 716 624 2670.

Sincerely,



Alan C. Fassbender

NANC Chairman

cc: Peter P. Guggins, Chairman, CLC

Ronald R. Connors, Director, NANC Administration

Walter Gordon, FCC

4140 Clover St
 Haverly Falls, NY 14472-9323

March 4, 1987

Regina M. Keeney
 Chief, Customer Carrier Bureau
 Federal Communications Commission
 1919 M Street NW
 Washington, DC 20554

Dear Ms Keeney:

The purpose of this letter is to update you concerning the issues raised in my letter of February 24, 1987 to you about certain pending NPA assignments.

At its February 26 meeting the NANC membership discussed the question of proposed NPA assignments in Florida, California and Utah that in our belief are inconsistent with the need to conserve NPA codes.

At its latest meeting the NANC membership again expressed serious concern about the precedent that will be established by these assignments and the potentially profound effect a continuation of similar practices will have in exacerbating a premature depletion of the remaining NPA codes and the potential misuse of other resources such as Easily Recognizable Codes.

NANC has begun a process of reviewing industry Numbering Guidelines to assure their specificity and completeness. It is our intention to subsequently recommend to the FCC and other NANPA governments the adoption of the Guidelines to assure compliance with them. Enforceable Guidelines are essential to the fair and efficient administration of the North American Numbering Plan and will be a significant tool in future conservation issues such as these. It is my objective to complete the review of NPA Guidelines before this fall. In the interim I hope we can avoid precipitating action to obtain codes prematurely.

I have attached for your information a synopsis of factual information about the three present requests. We have also taken action to minimize the effect of severe earlier use in 6-digit areas on the code administration.

Sincerely,



Alvin C. Harshbarger
 Chairman, NANC

cc Kathleen Levitz
 L. Geraldine Malice
 Menon Gordon
 Ronald Connors

Enclosure 1

**Facts Concerning Proposed NPA Relief in Florida, California and Utah
March 1, 1997**

Florida

Present Area Code 904

Area Covered: Northern Florida. Pensacola, Panama City, Tallahassee, Daytona Beach, Jacksonville

Planned Implementation Date: June 30, 1998

Exhaust Dates under Proposed Plan:

904	2006
New NPA 1	2006
New NPA 2	2030

California

Present Area Code 408

Area Covered: Santa Clara, Santa Cruz, Monterey and San Benito Counties and parts of San Mateo,

Stanislaus, San Luis Obispo and Merced Counties

Planned Implementation Date: July 11, 1998

Exhaust under Proposed Plan:

408	3 1/2 to 4 years
831	27 to 32 1/2 years

Utah

Present Area Code 801

Area Covered: Utah

Planned Implementation Date: Call blocking to begin January 18, 1998

Exhaust under Proposed Plan:

801	6 years
435	2025 +