

ORIGINAL

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2 DOCKET NO. 980671-TL
3 ORDER NO. PSC-98-0767-PCO-TL
4 ISSUED: June 4, 1998

5 In re: Request for review of proposed numbering plan relief for 407 area code.

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7 My name is Wayne Milby. I am employed by Lockheed Martin IMS as the Senior NPA
8 Relief Planner for the Eastern Region of the North American Numbering Plan. My
9 business address is 1133 15th Street, N.W., Washington, D.C. 20005.

10

11 Lockheed Martin IMS, in its role as North American Numbering Plan Administrator
12 (NANPA), is responsible for initiating NPA relief planning in areas within the US in
13 sufficient time to prevent the exhaust of numbering resources.

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15 Pursuant to the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-
16 016), see Exhibit 1 attached, NANPA hosted an industry meeting in Orlando, Florida on
17 March 31, 1998. The primary objective of the meeting was to review the Initial Planning
18 Document (IPD) and other alternatives from the industry, and come to a consensus on a
19 single relief plan to be presented to the Florida Public Service Commission. The industry
20 came to a consensus to recommend Alternative Relief Plan #1, an overlay, as the method
21 of relief for the 407 area code.

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23 As a neutral party, NANPA cannot take a position or make any recommendation
24 concerning the type of relief for an area code. Our role is that of facilitating the industry
25 consensus process towards the recommendation of an alternative for relief to the

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1 appropriate regulatory authority. On April 22, 1998, I filed documents with the Florida
2 Public Service Commission that provided the status of the industry's efforts, industry
3 meeting notes, and a description of the overlay alternative recommended by the industry.
4 The documents, see Exhibit 2 attached, also include all of the relief alternatives
5 considered by the industry.

INC

Industry Numbering Committee

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NPA Code Relief Planning and Notification Guidelines

Sponsored by ATIS,
the Alliance for Telecommunications
Industry Solutions

These guidelines are issued in resolution
to INC Issue #074.

TABLE OF CONTENTS

- 1.0 PURPOSE
- 2.0 ASSUMPTIONS AND CONSTRAINTS
- 3.0 NPA RELIEF PLANNING PRINCIPLES
- 4.0 CO CODE ADMINISTRATORS RESPONSIBILITIES FOR CODE RELIEF PLANNING
- 5.0 NPA RELIEF PLANNING PROCESS
- 6.0 ALTERNATIVE RELIEF METHODS
- 7.0 OTHER RELIEF PLANNING CONSIDERATIONS
- 8.0 UPDATING THE RDBS, LASS AND BRIDS
- 9.0 ROUTING OF NEW NPA CODE
- 10.0 THE PERMISSIVE DIALING PERIOD
- 11.0 ANI AND RECORDS CONVERSION
- 12.0 MANDATORY DIALING
- 13.0 MAINTENANCE OF THIS DOCUMENT
- 14.0 GLOSSARY
- Appendix A - Check List for NPA Code Relief Coordinator
- Appendix B - Issues to be Considered during NPA Relief Planning
- Appendix C - Industry Notification of NPA Relief Activity Time Line

1.0 Purpose - The purpose of this document is to provide guidelines for NPA code relief planning activities. This includes the relief planning process, industry notification process and the CO Code Administrators' responsibilities to the NPA Relief Coordinators, affected parties and applicable regulatory authorities within the North American Numbering Plan area. It also provides relief planning principles, administrative responsibilities and industry notification requirements. The steps of the NPA code relief planning process are listed and the alternative methods of providing relief and their various attributes are described.

2.0 Assumptions and Constraints - The development of these guidelines include the following assumptions and constraints:

2.1 These guidelines were intended to apply to geographic NPA relief planning only.

2.2 These guidelines were developed to facilitate and help standardize the geographic NPA relief planning process.

2.3 Relief activities will be undertaken to provide relief to an exhausting NPA. For the purpose of NPA relief planning, it is assumed that the capacity of an NPA is 792 CO codes (NXXs). However, in overlay NPA situations, the CO code exhaust capacity will be the number of NPA codes assigned to that geographic area times 792.

2.4 The relief plan chosen will seek to minimize end users' confusion while balancing the cost of implementation by all affected parties.

2.5 For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

2.6 All efforts should be made to choose a plan that does not favor a particular interest group, i.e., no carrier should receive a distinct competitive advantage over other carriers as a result of reaching a consensus on a particular plan.

2.7 It is assumed that the CO Code Administrator organization will provide the moderator for all relief planning meetings and that moderator will run meetings in a fair and impartial manner ensuring that all participants have any opportunity to express their opinions.

2.8 These relief planning guidelines were developed without making any assumption as to who will fill the role of CO Code Administrator or NANP Administrator.

2.9 CO codes and NPA codes are public resources and administrative assignment of these codes does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which the resource is assigned.

2.10 The appropriate regulatory commission (e.g., state, province, country) has the ultimate authority to approve or reject a relief plan.

2.11 In the United States, geographic NPA code boundaries do not currently extend across state lines.

2.12 Once there is a consensus/approved relief plan, all codes holders in the exhausting NPA will take the appropriate steps to facilitate the implementation of the plan.

2.13 These guidelines and all related documents/guidelines* referenced herein will be made available to all affected parties by the Relief Coordinator upon request.

3.0 NPA Relief Planning Principles - The following principles should be followed during NPA Code Relief Planning:

3.1 The NPA Code Relief Coordinator should facilitate the selection of a consensus NPA code relief alternative based upon input as outlined in Section 5 below.

3.2 Communications should be established with all affected industry members, appropriate regulatory bodies and the North American Numbering Plan Administration (NANPA). This should be initiated immediately after the need for NPA Code relief has been determined.

4. CO Code Administrators Responsibilities for Code Relief Planning - This section identifies required code relief planning functions that are related to the CO code (NXX) assignment functions as specified in these guidelines. These functions are identified because they are currently performed in conjunction with code assignment. An objective of this function is to promote effective and efficient code utilization and thereby help ensure the adequate supply of CO codes (NXXs).

The Code Administrator(s) shall be required to provide assistance in the code relief planning process when and if necessary. The output of the planning process shall be

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

made available to code holders, applicants and the industry by whatever means is appropriate.

Relief planning functions included in this section are as follows:

4.1 Tracks CO code (NXX) assignments within NPAs to ensure effective and efficient utilization of numbering resources.

4.2 Works with the Code Administrator(s) to prepare the annual CO Code Utilization Survey (COCUS) input as described in Sections 5.2.8 and 8.1 of the CO Assignment Guidelines and forwards the information to NANPA. This function includes the following activities:

4.2.1 Issues requests for, collects and compiles available information related to CO code (NXX) utilization and relief planning forecasts.

4.2.2 Investigates and resolves, wherever possible, any discrepancies in the information provided.

4.2.3 Any information released to NANPA or to the industry would be released only on an aggregated or summary basis. (See Section 8.1 of the CO Assignment Guidelines)

4.3 Projects CO code (NXX) exhaust within NPAs in order to prepare for NPA relief activity.

4.4 Develops plans for NPA relief and initiates implementation efforts, in both normal and jeopardy situations (Refer to Section 8.3 of the CO Assignment Guidelines). When the need for code relief is identified and relief activity is initiated, advises all parties affected by NPA relief activities and includes them in the planning effort.

4.5 Collects, compiles and forwards the necessary information to NANPA for the purpose of obtaining an NPA assignment when it is determined that a new NPA code is required to accommodate relief.

4.6 Obtain endorsement of NPA relief plan from appropriate regulatory authority(ies), where necessary.

4.7 Develops dialing plan alternatives within local jurisdictions.

4.8 Provides assistance to users of numbering resources and suggests alternatives, when possible, that will optimize numbering resource utilization.

4.9 Prepares and issues information related to reports for special information requests and scheduled periodic reports that relate to utilization of numbering resources.

5.0 NPA Relief Planning Process - NPA relief coordinators shall take the lead to prepare relief options for each NPA projected to exhaust within the next 5 to 10 years, in accordance with Section 3.0 above. These NPAs are identified in the Central Office Code Utilization Survey (COCUS) which is conducted annually by NANPA.

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 options shall be a living document and reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, etc.). The annual COCUS analysis shall be used as one of the tools in updating the options.

c) The relief plan, which will evolve from these relief options, shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

d) Interested industry parties are encouraged to become involved in the development of the plan. Local regulators shall be made aware of the plan and approve, if necessary.

e) The choice of relief methods (e.g., split, overlay, boundary realignment) is a local decision and shall be specified in the plan, along with boundaries if a split is chosen. The estimated relief period shall be included in the plan along with assumptions, projected code assignment rates, etc.

f) 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.

g) The use of protected codes (NXXs), which permit 7-digit dialing across NPA boundaries, should be eliminated or reduced to an absolute minimum as part of the NPA code relief planning process. Reduction or elimination of protected codes should be accomplished prior to a request for a relief NPA code.

h) 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 15 years, shall be avoided.

Requests for relief NPA codes shall be submitted to NANPA at least 18 months prior to the NPA relief date subject to local regulatory constraints. Normally, only one code will be assigned per request unless the codes are to be introduced simultaneously or unless implementation concerns dictate a phased-in implementation of subsequent NPA(s) within two years of the relief date of the preceding relief code. The latest version of the plan, along with relevant COCUS data, shall be submitted to NANPA with the NPA request.

5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes to NXX growth demands in the future, the Relief Coordinator should project to the best of his/her ability the expected exhaust of the NPA. The Central Office Code Utilization Survey (COCUS) should be used as an aid in this projection. Consideration may be given to unforeseen but reasonable increases and/or decreases to expected growth rates which would result in an exhaust "window" rather than a specific exhaust date. Once the earliest likely exhaust date is determined, the Coordinator should establish a mandatory dialing date six to twelve months prior to that date, giving consideration to items such as busy seasons, customer service order activity, customer equipment and number changes, and any other concerns which would increase the probability for service problems during the transition period.

5.2 Identify the Alternative Relief Methods Available - Within the affected NPA, the Relief Coordinator should next identify possible NPA relief alternatives and methods from among those identified in Section 6. This may include one or more NPA Split alternatives, at least one Overlay alternative, and, where applicable, one or more NPA Boundary Realignment alternatives. Combinations of these alternatives may also be considered.

5.3 Define the Attributes of Each Alternative or Method - For each of the alternative relief methods identified in 5.2, the Coordinator should next list and quantify the impacts, using Appendix A of this document, in order to determine the advantages and disadvantages of the alternatives. Specific calculations such as the relative lengths of the relief periods, identify the impacts of dialing local calls using 7-digits or 10-digits on an industry segment basis, and the number of subscribers requiring number changes should be made at this point. Technical and operational impacts should also be identified including items such as required switch replacements and support system modifications.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the recommended Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an initial Planning Document for

distribution to the Industry in the affected NPA. Attached to this Document should be a letter notifying 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 Relief Coordinators should also make available copies of this document, as well as other relevant documents*. Sufficient time should be provided prior to the meetings to allow individual industry members to fully analyze the alternatives from the perspectives of effects on their customers, economics and technological and operational impacts.

5.5 Conduct Industry Meetings 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 after each has had sufficient time to analyze the proposed alternative relief methods. The Relief Coordinator should provide a Moderator at 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 should be included in these discussions. Initially, separate meetings for the various industry segments may be held to increase efficiency and manageability. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be required.

In addition to discussing the alternatives, more detailed issues such as new NPA boundaries, local calling areas, regulatory issues, customer education, and the length of any necessary permissive dialing periods should be discussed.

All meetings and/or conference calls should be fully documented in meeting minutes which are to be made available to the participants prior to the subsequent meeting or call. Copies of meeting minutes may also be forwarded to the appropriate regulatory body as well as to the North American Numbering Plan Administrator.

5.6 Notify Appropriate Regulatory Body - When consensus is reached within the industry or when it appears that additional meetings would not achieve consensus, the NPA Relief Coordinator should submit to the appropriate regulatory body (or bodies) the results of the industry effort. If consensus was not obtained, the NPA Relief Coordinator may ask the regulatory body for assistance in reaching a solution. If regulatory assistance is required to adopt a "final plan", the NPA Relief Coordinator should prepare a "final recommendation" for circulation and then submit the "final plan" plus comments, if any, provided by industry participants to the appropriate regulatory body. Regulatory activities will vary by state. The Relief Coordinator should be prepared to furnish to the regulators any background information deemed necessary including the original studies,

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

meeting minutes, mailing lists, etc. The NPA Relief Coordinator should prepare a "final recommendation" for circulation and comment by industry participants. The NPA Relief Coordinator should then submit the "final plan" plus comments, if any, provided by industry participants, to the appropriate regulatory body.

5.7 Notify the North American Numbering Plan Administration (NANPA) - When the final NPA Relief Plan has been determined, and at least 18 months prior to the NPA Relief date, the Relief Coordinator should formally notify NANPA of the pending NPA exhaust, request formal assignment of a new NPA, and submit sufficient background information to justify the assignment of a code. Normally this would include the exhaust and relief projects discussed in 5.1 and 5.3, a description of the relief method to be utilized and the relief schedule. In those situations where a final plan has not yet been developed prior to the 18-month requirement, the Planner should forward whatever information is available at that time, together with a statement that the final relief method has not yet been determined.

5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA
- that the telecommunications industry in the exhausting NPA will meet (time/place) to begin planning for the relief
- and that questions concerning the relief effort may be directed to the NPA Relief Coordinator (name/tel. no.)

The relief alternatives described in Section 6 may be identified as the range of possible alternatives, however, preference regarding specific relief alternatives should not be discussed.

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the Relief Coordinator, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry planning committee. Upon reaching consensus on a relief plan, a press release developed with industry input may be issued to inform the public of the industry approved plan for relief of the exhausting NPA.

If there is no industry consensus for a relief plan, the NPA Relief Coordinator may advise the public of that fact and that a final recommendation, along with written comments from industry participants have been submitted to the appropriate regulatory authority for its final disposition. Upon regulatory approval of a relief plan, the NPA Relief Coordinator

will advise the public of the details of the plan. This does not preclude NANPA from issuing its standard ILs in accordance with industry guidelines for such notice (see ICCF 92-1127-006).

5.9 Public Announcement of the Relief - A minimum of 12 months advance notice of an NPA split/overlay should be provided by the NPA Relief Coordinator. This notice should include a full disclosure of the associated testing period, permissive dialing time, ANI and records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification and the date it will become available. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, new dialing procedures (if any) and a contact name and telephone number.

In addition to any other public announcements, the North American Numbering Plan Administration (NANPA) will provide 12 months advance notice to the industry via a Bellcore Information Letter. In order to do so, they must receive the required information from the NPA Relief Coordinator at least one month before the 12 month notice is to be published. The NXXs associated with the NPA relief will not be published with the NANP letter, but will continue to be published in the Local Exchange Routing Guide (LERG) at least six months in advance (to be coordinated with the quarterly issue).

Prior to the 12 month notification period, NPA Relief Coordinators are encouraged to begin informal discussions with the impacted access purchasers and other entities to provide whatever information may be available at the time regarding an NPA split/overlay. It is recognized that planning for an NPA split involving other carriers (e.g., cellular, independents and others as appropriate) may begin earlier than this information notification.

The NPA Relief Coordinator may choose to provide a formal public notification of the planned NPA relief prior to the 12 month notice with full disclosure. To the extent that such notification is made, the NPA Relief Coordinator should inform the NANP of the announcement. Upon receipt of the information, the NANPA will issue a Bellcore Information Letter describing the proposed relief. It is recognized that this letter will typically not contain all the information to be provided with the 12 month (full disclosure) letter, but will simply alert the industry (areas served by the NANP) of the upcoming event.

6.0 Alternative Relief Methods - All of the currently identified code relief alternatives are described below. Possible impacts of these alternatives are found in Appendix B.

6.1 NPA Split Method - By this method, the exhausting NPA is split into two geographic areas leaving the existing NPA code to serve, for example, an area with the

highest customer density (in order to minimize number changes) and assigning a new NPA code to the remaining area. This method divides areas by jurisdictional, natural or physical boundaries (counties, boroughs, cities, river, etc.) between the old and new NPAs.

This method has been the alternative chosen for practically all NPA relief situations prior to 1995. NPA splits have occurred with enough frequency so that technical aspects have been addressed and established implementation procedures are generally understood. Public education and acceptance of the process has been made easier because of the numerous NPA splits that have occurred. This method generally provides long term relief for an area.

6.2 Boundary Realignment Method - In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift 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. This method applies to multi-NPA states or provinces only. It could provide for a better balance of central office (NXX) code utilization in the affected NPAs. This method is viewed as an interim measure because it tends to provide a shorter term relief than when providing a new NPA code.

6.3 Overlay Method - An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is provided by opening up a new NPA code within the same geographic area as the NPA(s) requiring relief. Numbers from this new NPA are assigned to new growth on a carrier neutral basis, i.e., first come, first served. Mandatory customer number changes within the affected overlay relief area are eliminated. In most cases, with the overlay relief method, 10 digit dialing is required for some of the affected customers' calling patterns. Since the overlay relief method could result in unequal dialing for those customers served out of the overlay NPA, mandatory 10 digit dialing is recommended for all NPAs covered by the NPA coincident with the implementation of an overlay.

The overlay method reduces or eliminates the need for customer number changes like those required under the split and realignment methods. It also allows the option to eliminate the permissive dialing period as part of implementation. This method will necessitate ten digit dialing of local calls between the old and new NPAs as central office (NXX) codes are implemented in the new NPA. NPAs have been previously implemented within an area and will vary with the individual characteristics of the area involved. Four potential implementation strategies have been identified for an NPA overlay. They are listed below:

6.3.1 Distributed Overlay - The distributed overlay strategy may be considered in situations when growth in telephone numbers is expected to be more or less evenly distributed throughout the existing NPA requiring relief. The new NPA is added to the NPA requiring relief and shares exactly the same geographic boundaries. When growth telephone numbers are required, they are assigned from the new NPA.

6.3.2 Concentrated Growth Overlay - A concentrated growth overlay may be considered in situations when 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 phone numbers in that section would be assigned from the new NPA. As more relief is required, the geographic area served by multiple NPAs could expand.

6.3.3 Boundary Extension Overlay - With a boundary extension 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 extension 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 some of the limitation of boundary realignment in that it provides less long term relief.

6.3.4 Multiple Overlay - The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief, i.e., a split or a distributed overlay. 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.

6.4 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 overlay 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.

7.0 Other Relief Planning Considerations - This section describes miscellaneous considerations which 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 Organization Considerations - To the maximum extent possible, NPA relief planning should include considerations of organizational continuity. This includes not only the Administrator's own organization or entity, but continuity within the industry as well. The chances for successful implementation of relief efforts are greatly enhanced if there is smooth transition from the planning phase and continued involvement with the industry team as implementation progresses. Thorough documentation and dissemination of information throughout the planning process will assist in ensuring the desired continuity in the event personnel and/or organizational changes disrupt the transition.

7.2 Regulatory Issues - Involvement of the State Regulatory Staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

7.3 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 any case, the relief effort should be planned to be completed at least three months before the existing NPA would exhaust under the highest growth projections.

NPA splits require the establishment of a permissive dialing period during which calls placed to the area to be served by the new NPA can be completed whether the new or the existing NPA code is dialed by the caller. During this time, changes are made to business telephone systems, wireless devices, alarm system networks and individual subscribers' custom calling feature lists. In addition, ANI information and billing/ordering systems may be modified to handle the new NPA code. Central office codes may not be duplicated in the old and new NPAs during this time.

The length of the permissive dialing period may vary depending on the amount of time required to accomplish the above activities. Permissive dialing periods are as short as four months or as long as two years have historically been used. A decision regarding the length of the permissive dialing period, if required, must be a part of the overall Plan. When establishing transition schedules, consideration should also be given to avoiding the need to make network changes during the busiest times of the year, from the perspectives of call volumes, customer movement and holidays. Other scheduling

concerns include the length and type of customer education efforts, the length of time required for network changes and overall budget considerations.

7.4 Customer Calling Patterns - Existing and planned local calling areas should be considered during the planning process and retained, wherever practical, along with their existing or planned dialing arrangements. This may prevent regulatory policy delays during implementation and/or unexpected changes to the final plan.

7.5 Interest Group Considerations - It is difficult if not impossible during NPA relief efforts to avoid negative impacts on some customers within the NPA. Whichever alternative relief method is chosen, it is highly possible that one or more customer groups may attempt to influence the decision in a manner which is most favorable to them. Extreme care must be taken by the NPA Relief Coordinator to ensure that fair and equitable treatment is given to all subscribers within an area.

8.0 Updating the RDBS, LASS and BRIDS - At least six months prior to the NPA relief date, the NPA Relief Coordinator should make arrangements for Bellcore's Traffic Routing Administration (TRA) to update the Routing Database System (RDBS), LIDB Access Support System (LASS) and Bellcore Rating Input Database System (BRIDS)** . Notification to the industry should appear six months prior to the NPA relief date in the Local Exchange Routing Guide (LERG), which is used for message and call setup routing. Ninety days prior to the NPA relief date, the updates should appear in BRADS output products such as the NPA/NXX V&H coordinates diskette and tape. Prior to the NPA relief date, the updates should be reflected in the LIDB Access Routing Guide (LARG), which is used for Alternate Billing Service (ABS) query routing.

9.0 Routing to the New NPA Code - A test number providing an announcement that calls have reached a termination in the new NPA should be made available 4 to 6 weeks prior to the official NPA relief date and remain available throughout the entire permissive dialing period. The test number will enable all carriers and other entities to do the necessary testing to insure that the proper routing changes have been made to direct calls to the new NPA beginning on the relief date. Such changes should be made prior to the relief date, rather than after the relief date during the permissive dialing period. If customers cannot dial the new NPA code during the permissive period because some carriers were unable to complete the necessary effort on the relief date, the usefulness of the permissive dialing period is negated.

** A recommended checklist of additional activities concerning the exchange of data/information that should be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief are found in Appendix A.

10.0 The Permissive Dialing Period - The relief date signals the start of the permissive dialing period. The permissive dialing period should precede mandatory dialing of the new NPA code. To reach a telephone in the new NPA during this time, the customer may dial either the existing NPA code and the 7 digit number or the new NPA code and the same 7 digit number.

The length of the permissive dialing period is determined by the NPA Relief Coordinator. This period should allow sufficient time for customers to:

- revise printed materials (e.g., stationery, business cards, labels, bills, etc.)
- reprogram equipment that stores and analyses telephone numbers (e.g., PBXs, cellular phones, modems, speed call lists, automatic dialers)
- update directory listings
- notify customers and business associates
- change advertising (e.g., print ads, classified ads, promotional materials, etc.)

11.0 ANI and Records Conversion - ANI and records conversion should begin on or after the start of permissive dialing. ANI conversions are performed on a central office-by-central office basis and usually takes place over two or three months. It is recognized that the tasks of ANI and records conversion are complex and interdependent and that these efforts must be coordinated. Moreover, it is further recognized that records conversion can occur either before or after ANI conversion. Accordingly, for each NPA split/overlay, the time of the records conversion, whether it occurs before or after ANI conversion, will be coordinated by the NPA Relief Coordinator.

ANI conversions should not take place prior to permissive dialing in order to avoid potential problems with CLASS services.

12.0 Mandatory Dialing - The end of the permissive dialing period is the date that mandatory dialing of the new NPA code begins. All calls to both the old and new NPA codes must be dialed with the correct NPA. All misdialed calls will be intercepted by a recording and an instructional announcement will be provided.

Once the date for mandatory dialing has been established, any change which would advance that date should be made known to all parties no later than 30 days prior to the new date.

13.0 Maintenance of These Guidelines - These guidelines were developed by the NPA Code Relief Workshop of the Industry Numbering Committee (INC). Any recommended changes or modifications to these guidelines should be directed to the Industry Numbering Committee.

14.0 Glossary

ANI CONVERSION – The process by which the NPA portion of the calling party's automatic number identification (ANI) from end offices located in the new NPA changes from the old NPA to the new NPA.

COCUS – Central Office Code Utilization Survey (COCUS) is conducted annually by NANPA from direct input received from Central Office Code Administrator(s) in order to monitor central office code utilization, projected exhaust of NPAs and demand for new NPAs to provide code relief. The purpose of COCUS is to provide an annual overall view of both present and projected CO code (NNX/NXX) utilization for each NPA in the NANP.

Code Administrator – Entity(ies) responsible for the administration of the NXXs within an NPA.

Code Holder – The entity to whom a CO code (NNX/NXX) has been assigned for use at a Switching Entity or Point of Interconnection it owns or controls.

Conservation – Consideration given to the efficient and effective use of a finite numbering resource in order to minimize the cost and need to expand its availability, while at the same time allowing the maximum flexibility in the introduction of new services, capabilities and features.

Consensus – Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome of the result. Substantial agreement means more than a simple majority, but not necessarily unanimity.

Jeopardy NPA – A jeopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief. Accordingly, pending exhaust of NXX resources within an NPA does not represent a jeopardy condition if NPA relief has been or can be planned and the additional NXXs associated with the NPA will satisfy the need for new NXX codes.

Mandatory Dialing Date – The date where permissive dialing ends and the new NPA must be dialed to complete the call.

Moderator – An employee of the CO Code Administrator's organization which presides over NPA Code Relief coordination meetings. Responsibilities usually include issuing the meeting announcement, coordinating meeting arrangements, leading the meeting, issuing meeting minutes and other duties as necessary to conduct the meeting.

NANP – The North American Numbering Plan is a numbering architecture in which every station in the areas served by the NANP is identified by a unique ten-digit address consisting of a three digit NPA code, a three digit central office code of the form NNX/NXX, and a four digit line number of the form XXXX, where N represents the digits 2-9 and X represents any digit 0-9.

NANPA – North American Numbering Plan Administration. With divestiture, key responsibilities for coordination and administration of the North American Numbering/Dialing Plans were assigned to NANPA. These central administration functions are exercised in an impartial manner toward all industry segments while balancing the utilization of a limited resource.

NPA – Numbering Plan Area, also called an area code. An NPA is the three digit code that occupies the A, B and C positions in the ten digit NANP format that applies throughout the areas served by the NANP. NPAs are of the form N0/1X, where N represents the digits 2-9 and X represents any digit 0-9. After 1/1/95, NPAs will be of the form NXX. In the NANP, NPAs are classified as either geographic or non-geographic.

A. Geographic NPAs are NPAs which correspond to discrete geographic areas served by the NANP.

B. Non-geographic NPAs are NPAs that do not correspond to discrete geographic areas, but which are instead assigned for services with attributes, functionalities or requirements that transcend specific geographic boundaries. The common examples are NPAs in the N00 format, e.g. 800.

NPA Code Relief – NPA code relief refers to an activity that must be performed when an NPA nears exhaust of its 640 NNX or the 792 NXX capacity. Relief is typically provided to an NPA about a year before its capacity is reached. NPA code relief for an NPA that is nearing the 640 NNX limit is usually provided in the form of implementing interchangeable central office code (ICOC) which provides an additional 152 assignable central office codes. An NPA that has been implemented as ICOC has a capacity of 792 assignable NXX central office codes. Providing code relief to such an NPA normally takes the form of assigning a new NPA for an NPA split or overlay. Another option is changing the boundary of the existing NPA.

NPA Relief Coordinator – The organization responsible for the overall coordination of the NPA relief activity.

NPA Relief Date – The date by which the NPA is introduced and routing of normal commercial traffic begins.

Permissive Dialing Period - The time frame beginning with the introduction of the new NPA whereby both the old and new NPA can be dialed. The beginning of permissive dialing is coincident with the relief date and ends with the mandatory dialing date.

Premature Exhaust - (When referring to NANP): Premature exhaust means the exhaust of NANP resources (i.e., requires expansion beyond the 10 digit format) much sooner than the best industry projections. The NANP is expected to meet the numbering needs of the telecommunications industry well into the 21st century (i.e., a minimum of 25 years). (When referring to NPA): Premature exhaust is when a specific date for NPA relief has been established and the NPA is projected to exhaust prior to that date.

Records Conversion - The process by which all appropriate records are converted to the new NPA. All documents that require an area code must indicate the new NPA when appropriate (e.g., access service request).

Relief Options - 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. The relief options shall be a living, evolving document and shall reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, etc.) The annual COCUS analysis shall be used as one of the tools in updating the options.

Relief Plan - The relief plan will evolve from the relief options shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

Service Providers - Any entity that is authorized, as appropriate, by local governmental, state, federal or governmental authorities covering areas served by the NANP to provide communications services to the public.

Testing Period - Time frame prior to permissive dialing that the new NPA will be open so that carrier and other entities can begin testing their networks.

Working Telephone - The quantity of telephone numbers within existing CO codes.

Numbers (Tns) - (NNX/NXX) which are assigned to working subscriber access lines or their equivalents, e.g., direct inward dialing trunks, paging numbers, special services, temporary local directory numbers (TLDNs), etc., within a switching entity/POI.

Appendix A

Checklist for NPA Code Relief Coordinator

The following are specific activities concerning the exchange of data/information that can be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief.

1. Avoid last minute changes to data e.g., information contained in the RDBS (the source of the LERG) and BRIDS (the source of Vertical & Horizontal Master Data) that is directly related to NPA relief activity.
2. Provide a list of LEC companies in a given NPA that are impacted by the NPA relief activity and, if known, a contact within each company.
3. Specifically identify and convey any changes in trunking arrangements associated with NPA relief activities.
4. Avoid NXX activation and/or changes occurring simultaneously with an NPA split or other relief activity.
 - If new NXXs must be activated, separately identify these codes to access purchasers as well as providing this information via the LERG.
5. Avoid Carrier ownership changes simultaneously with an NPA split or other relief activity.
6. Avoid duplicating NXX codes in the old and new NPAs during the permissive dialing period as well as on the mandatory dialing date.
7. NPA Relief Coordinators should include the Bellcore Traffic Routing Administration (TRA) on their distribution of NXX information associated with an NPA split or other relief activity.
8. The NPA Relief Coordinator will be the point of contact for matters concerning the NPA split or other relief activity. In addition, Bellcore TRA will also be a point of contact to resolve discrepancies between NPA relief information shown in the RDBS and BRIDS products versus that provided by a given NPA Relief Coordinator.

Appendix B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered by the NPA Relief Coordinator to determine the advantages of the proposed relief alternatives.

Subscribers

- quantity of subscribers who will need number changes
- impact on 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 (stationary, business cards, customer premise equipment (CPE) and database reprogramming.

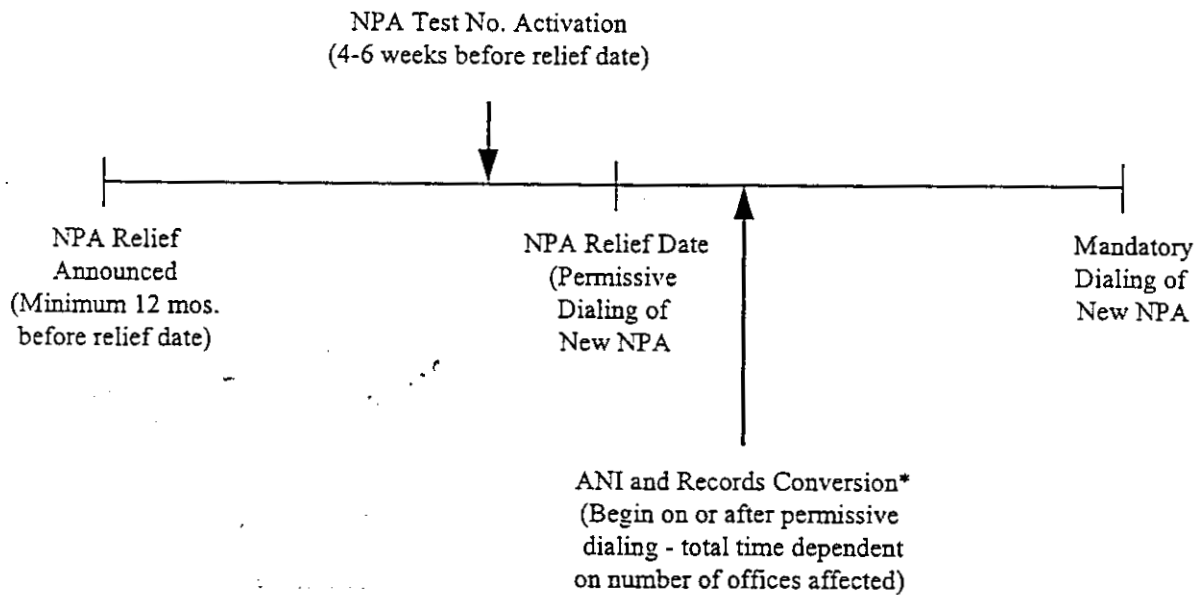
Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operating supporting 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

Industry Concerns


- length of relief period
- NPA code utilization

Industry Notification of NPA Relief Activity Timeline



* Records conversion may occur before or after ANI conversion

Lockheed Martin IMS
Communications Industry Services
1133 15th Street, N.W. Washington, D.C. 20005
Telephone 202-756-5600 Facsimile 202-887-0331

Dwm Exhibit 2
LOCKHEED MARTIN 

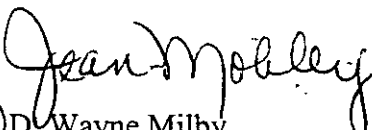
April 22, 1998

To: 407 NPA Code Holders & Other Industry Members

Re: 407 NPA Relief Filing

Enclosed is the filing for the 407 NPA Relief proceeding which was filed today with the Florida Public Service Commission. The final minutes of the March 31, 1998 NPA 407 Relief meeting are attached to the filing.

If you have any questions or concerns, please give me a call on 804-795-5919.


for D. Wayne Milby
Senior NPA Relief Planner
NANPA

Enclosures

Page 1

April 22, 1998

Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dear Mr. D'Haeseleer:

Based on current demand projections for Central Office (CO) codes, it is estimated that without any means of relief, Florida will exhaust the supply of CO codes in the 407 area code by approximately the fourth quarter of 1999. Pursuant to the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016), an industry meeting was held on March 31, 1998 to discuss alternative relief plans. The industry came to a consensus to recommend Alternative Relief Plan #1, an overlay, as the method of relief for the 407 area code.

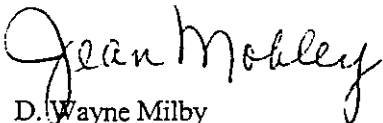
The attached documents provide background information, a status of the industry's efforts, industry meeting notes and a description of the overlay relief alternative recommended by the industry. The attached minutes of the March 31, 1998 industry meeting also include all of the relief alternatives considered by the industry.

Futhermore, the Industry reached consensus on the following implementation dates for the new overlay:

November 2, 1998 - Transition Dialing Start
June 21, 1999 - Mandatory 10-Digit Dialing Date
July 21, 1999 - Effective Date for new CO NXX Codes in the Overlay Area Code

These dates will ensure sufficient time for service providers to modify their networks and to educate all telecommunications customers who live in, work, and call into the 407 area code prior to the introduction of the new overlay area code. We have been asked by the industry to submit the results of its efforts and to request the PSC approve its recommendation no later than July 2, 1998 in order to effect a smooth transition and guarantee an uninterrupted supply of numbers.

Very Truly Yours,



for D. Wayne Milby
Senior NPA Relief Planner - Eastern Region
NANPA

cc: 407 NPA Code Holders & Other Industry Members

Attachments

Page 2

407 AREA CODE RELIEF

A. BACKGROUND

Florida, like the rest of the nation, has recently experienced tremendous demand for telephone numbers. The 407 area code has served the Orlando LATA for many years, but growth in competition and new telecommunication technologies will soon exhaust the 407 numbering resource which has created the need for a new area code.

NANPA and the industry utilize the NPA Code relief Planning and Notification Guidelines (INC 97-0404-016) to plan the introduction of new area codes. This document can be accessed from the ATIS web site (www.atis.org/atis/clc/inc/incdocs/htm). These guidelines assist NANPA, the industry and regulatory authorities with assumptions, constraints and planning principles to be used in area code relief planning efforts. In addition, the guidelines list the steps of the area code relief process and describe the alternative relief methods and their associated attributes. They also require NANPA to invite members of the industry to meet and evaluate relief alternatives and attempt to achieve consensus on a relief plan.

B. STATUS OF INDUSTRY EFFORTS

In accordance with the guidelines, D. Wayne Milby, Senior NPA Relief Planner, NANPA sent a letter to code holders and other industry members on March 3, 1998. This letter notified the industry of the 407 area code exhaust situation and the schedule for the upcoming Industry Meeting in Orlando, Florida. An Initial Planning Document (IPD) (Exhibit A) was prepared by NANPA that included maps of six illustrative relief alternatives, including an overlay and five geographic splits. It also included historical and projected Central Office (CO) code utilization by rate center, and the projected life

for each relief alternative under two different growth assumptions. The IPD was sent to the industry on March 18, 1998.

NANPA hosted the industry meeting in Orlando, Florida on March 31, 1998 in which various industry segments were represented. Wayne Milby gave an overview of the NANPA transition schedule and industry guidelines. He then reviewed demographic data relevant to the four counties in the 407 NPA. The Initial Planning document was reviewed and the industry input was solicited for additional alternatives. The industry proposed four additional alternatives: an overlay with a boundary realignment to include the "Orange City" rate center and three geographic splits. (See Exhibit B)

The industry reached consensus to eliminate all alternatives but #1, #4 and #7. After considerable debate, Alternative #1, an overlay, became the consensus choice of the industry participants.

C. DESCRIPTION OF ALTERNATIVE FOR CONSIDERATION

Alternative #1, will overlay a new area code on the entire 407 area code and use the existing 407 boundary lines (see map, Exhibit C). All existing customers would retain the 407 area code and no numbers will have to change. As telephone numbers in the existing 407 area are used up, new customers would be given the new area code.

Under current federal rules, this method requires mandatory 10 - digit dialing of local calls upon activation of the overlay code, i.e., all calls between and within the overlay area codes must be dialed with the area code and 7 digits.

D. LIST OF ATTACHMENTS

Initial Planning Document	Exhibit A
Industry Meeting Minutes, March 31, 1998	Exhibit B
Map - Overlay Alternative #1	Exhibit C

March 18, 1998

To: 407 NPA Code Holders & Other Industry Members

Re: Industry Meeting for NPA 407 (Florida)

The 407 NPA in Florida is projected to exhaust during the third quarter of 1999.

With reference to my letter of March 3, 1998, enclosed is a copy of the Initial Planning Document (IPD) for the 407 NPA Relief Industry Meeting on March 31, 1998. Six alternatives for relief are presented for your consideration and study before the meeting. The IPD includes the number of NXX codes currently assigned to each rate center along with the projected growth in demand for NXX codes over the next several years.

If you wish to present an additional alternative for the industry to consider, please be prepared to present it at the meeting on March 31, 1998. Alternative #7 in the attached IPD has been left blank for your use in preparing an additional alternative.

The meeting will be held at the Sheraton Orlando North Hotel (Tel: 407-660-9000), 600 North Lake Destiny Drive, Maitland, Florida from 9:00 am to 4:00 pm. Directions to the hotel and an agenda are enclosed for your information.

If you plan to attend this meeting, and have not already submitted a reservation, please complete and return the enclosed Advanced Meeting Reservation Form by March 23, 1998 so we can make plans to accommodate everyone who wishes to attend. The cost of the meeting facilities at the Sheraton Hotel will be divided among the Industry participants, and should range between \$20 to \$40. An invoice for the exact charge will be rendered a few days after the meeting.

Please give me a call on 804-795-5919 if you have any questions or require additional information.

Jean Mollay

for D. Wayne Milby
Senior NPA Relief Planner – Eastern Region
NANPA

Enclosures

cc: Walter D'Haeseleer, Director, Division of Communications, Florida PSC

Page 6

AGENDA

**407 NPA RELIEF INDUSTRY MEETING
TUESDAY, MARCH 31, 1998**

**Sheraton Orlando North Hotel
Maitland, Florida**

- 8:30 Coffee and Registration
- 9:00 Welcome and Introductions
- 9:10 NANPA Transition Update
- 9:20 Minutes and "Statements For The Record"
- 9:25 Industry Guidelines
- 9:35 Review Initial Planning Document
- 10:15 Break
- 10:30 Review Initial Planning Document
- 11:00 Additional Alternatives from Industry
- 11:45 Lunch (On Your Own)
- 12:45 Elimination Of Alternatives
- 1:00 Consensus On Relief Alternative
- 2:15 Consensus on Dialing Plan
- 2:30 Break
- 2:45 Consensus on Implementation Intervals
- 3:15 Industry Commitment For Test Number
- 3:30 Consensus on NANPA Filing Industry Efforts With Commission
- 3:40 Set Date For Conference Call To Approve Minutes
- 3:45 Complete NANPA Survey
- 4:00 Adjourn

ADVANCED MEETING RESERVATION FORM

TELECOMMUNICATIONS INDUSTRY MEETING

**407 NPA Industry Meeting
Sheraton Orlando North Hotel
600 North Lake Destiny Drive
Maitland, Florida 32751
Tel: 407-660-9000
March 31, 1998**

Hosted by: NANPA

Please complete the form below and FAX to Jean Mobley by March 23, 1998 on 202-887-0331. Jean's telephone number is 202-756-5783.

Name: _____

Address: _____

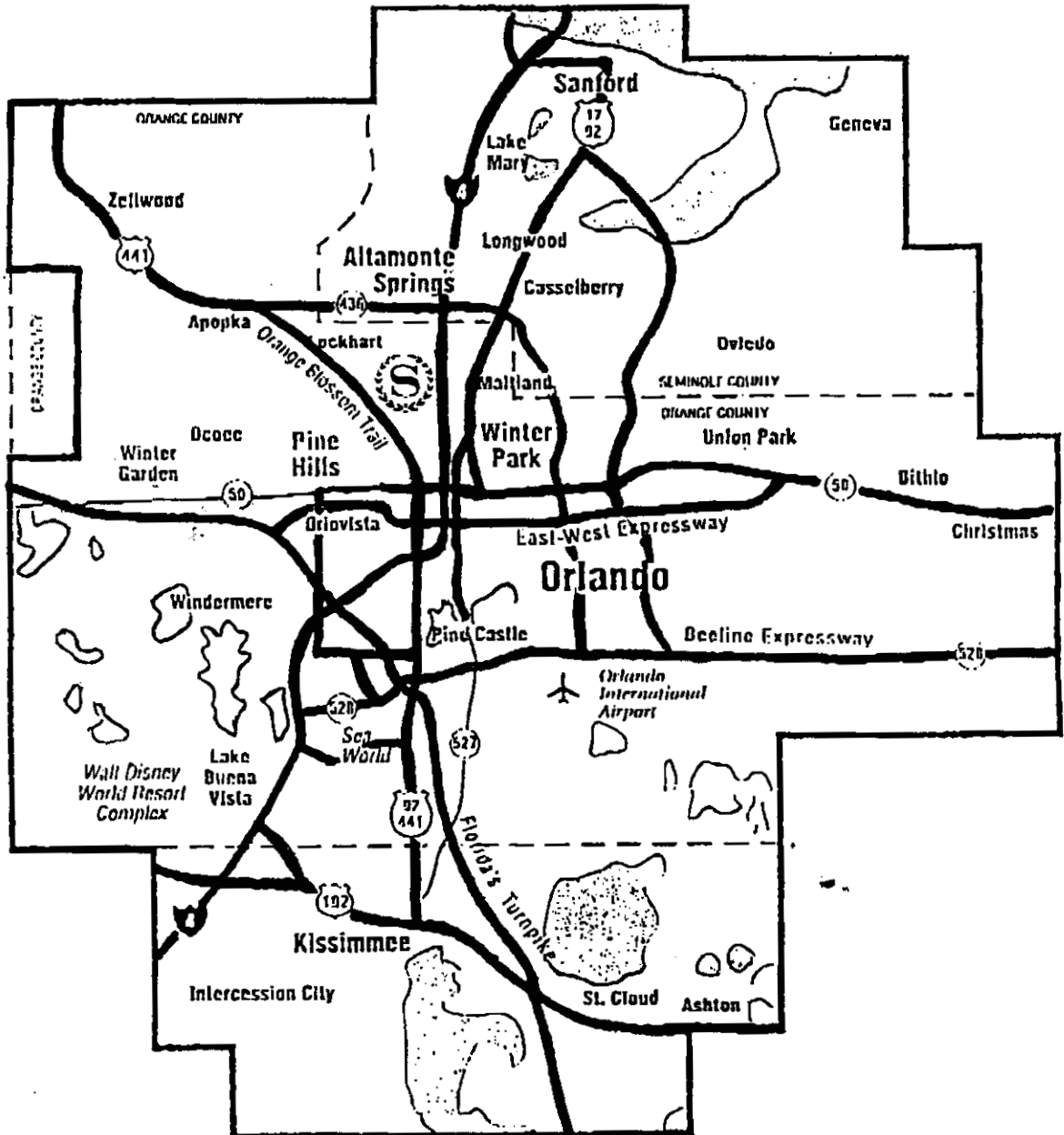
Company: _____

Telephone Number: _____

FAX Number: _____

E-mail Address: _____

SHERATON ORLANDO NORTH HOTEL



departing the airport, take Semoran Blvd. (SR 436 North). Stay on 436 six miles, to the East/West Expressway (408). Go west on the Expressway five miles to I-4. Go east on I-4 seven miles to Maitland Blvd., West (exit 47B).

Initial Planning Document
For Relief of Florida 407 NPA

Prepared by:

D. Wayne Milby

Senior NPA Relief Planner

North American Numbering Plan Administration

Ronald R. Conners, Director
James N. Deak, Regional Director - NPA Relief Planning

March 18, 1998

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

Existing 407 NPA						Alternative #1		Alternative #2 - Single Split				Alternative #3 - Single Split				Alternative #4 - Single Split			
						Single Overlay		Area "A" = Orange & Seminole Counties				Area "A" = Orange & Osceola Counties				Area "A" = Part of Orange & Osceola			
CO Codes in Service			Forecasted Growth			407 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
		Total	Wireless	2Q98	At	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	
RATE CENTER		Codes	Codes	3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	
APOPKA	9		3	12	2	12	2	12	2			12	2					12	2
CELEBRATN	1		2	3	1	3	1			3	1	3	1			3	1		
COCOA	49	23	21	70	20	70	20			70	20			70	20			70	20
COCOABEACH	10		3	13	2	13	2			13	2			13	2			13	2
DEBARY	6		2	8	1	8	1	8	1					8	1			8	1
EASTORANGE	4		2	6	1	6	1	6	1					6	1			6	1
EAU GALLIE	11		3	14	2	14	2			14	2			14	2			14	2
GENEVA	3		2	5	1	5	1	5	1					5	1			5	1
KENANSVL	2		2	4	1	4	1			4	1	4	1					4	1
KISSIMMEE	25	8	11	36	10	36	10			36	10	36	10			36	10		
LKBUNAVIST	7		2	9	1	9	1	9	1			9	1			9	1		
MELBOURNE	30	7	13	43	11	43	11			43	11			43	11			43	11
MONTVERDE	3		2	5	1	5	1	5	1			5	1			5	1		
ORLANDO	196	68	88	284	87	284	87	284	87			284	87			284	87		
OVEDO	8		3	11	2	11	2	11	2					11	2			11	2
REEDYCREEK	6		2	8	1	8	1	8	1			8	1			8	1		
SANFORD	30	3	12	42	10	42	10	42	10					42	10			42	10
ST CLOUD	7	1	2	9	1	9	1			9	1	9	1					9	1
TITUSVILLE	7		2	9	1	9	1			9	1			9	1			9	1
WINDERMERE	5		2	7	1	7	1	7	1			7	1			7	1		
WINTERGRDN	8		3	11	2	11	2	11	2			11	2			11	2		
WINTERPARK	89	23	37	126	34	126	34	126	34					126	34			126	34
WKISSIMMEE	10		3	13	2	13	2			13	2	13	2			13	2		
TOTAL CODES	526	133	222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89

page 11

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

Existing 407 NPA						Alternative #1		Alternative #2 - Single Split				Alternative #3 - Single Split				Alternative #4 - Single Split					
						Single Overlay		Area "A" = Orange & Seminole Counties				Area "A" = Orange & Osceola Counties				Area "A" = Part of Orange & Osceola					
CO Codes in Service			Forecasted Growth			407 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"			
			Total	1.25 year			Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year			
RATE CENTER			At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth			
			3Q98	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00	3Q99	4Q99 - 00			
TOTAL CODES			526	133	222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89
								a	b	a	b	a	b	a	b	a	b	a	b	a	b
Area Code Life Under Assumption #1																					
c Number of area codes serving the territory						2		1		1		1		1		1		1		1	
d Number of assignable codes in an NPA(s) (748*c)						1496		748		748		748		748		748		748		748	
e Number of working codes at exhaust (a)						748		534		214		401		347		376		372		372	
f Number of available codes for assignment (d - e)						748		214		534		347		401		372		376		376	
g Average forecasted code growth per year 4Q1999-2000 (b/1.25)						156		115		41		88		68		85		71		71	
h Area code life in years (f/g)						4.8		1.9		13.1		3.9		5.9		4.4		5.3		5.3	
Exhaust year						2005		2002		2013		2004		2006		2004		2005		2005	
Area Code Life Under Assumption #2																					
i Number of available codes for assignment (f)						748		214		534		347		401		372		376		376	
j Total forecasted code growth 4Q1999-2000(b)						195		144		51		110		85		106		89		89	
k Number of available codes for assignment beyond 2000 (i-j)						553		70		483		237		316		266		287		287	
l Forecasted code growth per year beyond 2000 (g/2)						78		58		20		44		34		42		36		36	
m Code life in years (k/l)+1.25 years						8.3		2.5		24.9		6.6		10.5		7.5		9.3		9.3	
Exhaust year						2008		2002		2025		2006		2010		2007		2009		2009	
Assumption #1: Code growth continues at 4Q1999-2000 levels																					
Assumption #2: Code growth reduced by 50% beyond 2000																					

Page 1a

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

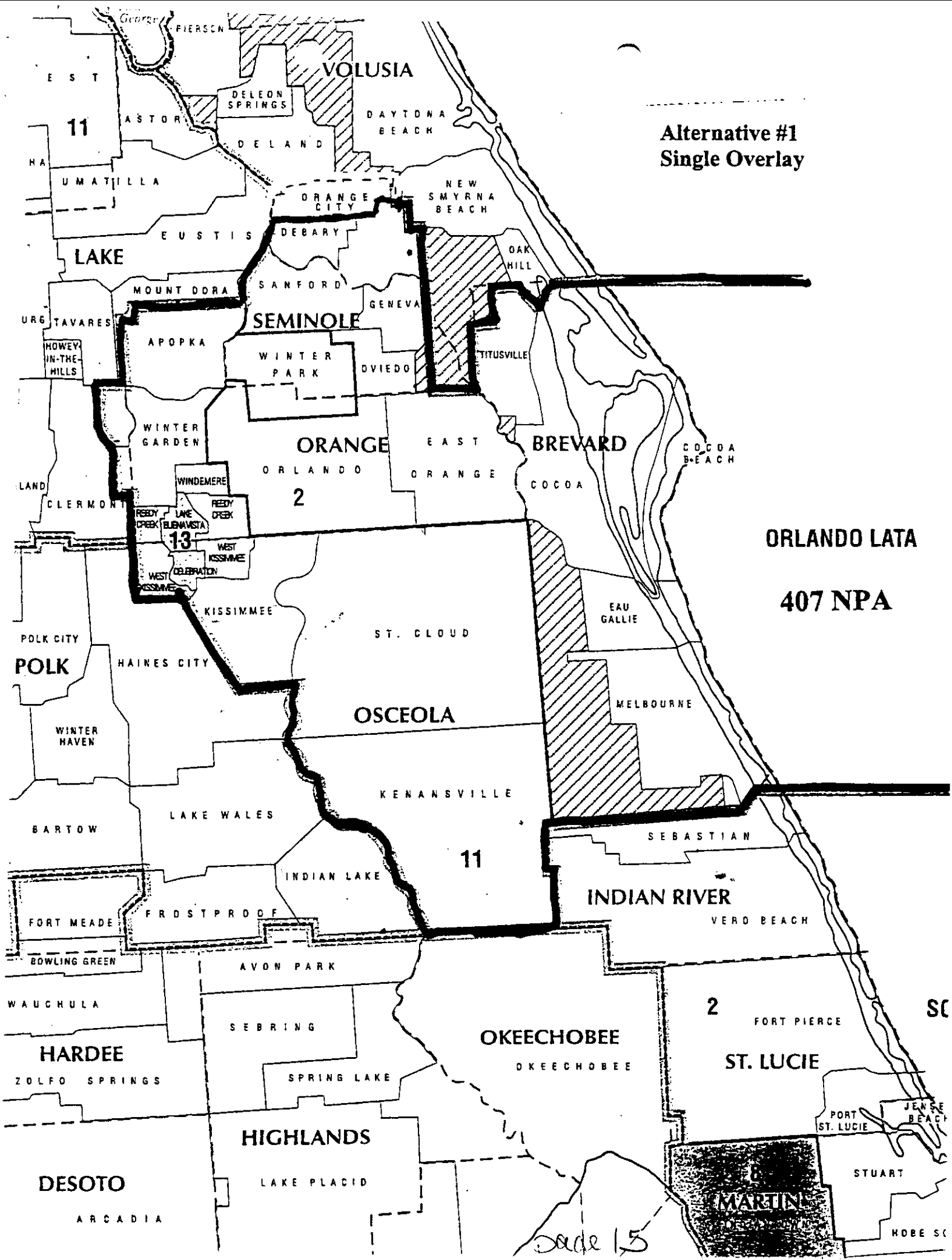
Existing 407 NPA						Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split			
						Area "A" = Orlando & Winter Park Rl Ctr				Area "A" = Orlando Rate Center				Area "A" =			
CO Codes in Service			Forecasted Growth			Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
Total	Wireless		Total	1.25 year		Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year
Codes	Codes		2Q98	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth
			3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00
APOPKA	9		3	12	2			12	2			12	2				
CELEBRATN	1		2	3	1			3	1			3	1				
COCOA	49	23	21	70	20			70	20			70	20				
COCOA BEACH	10		3	13	2			13	2			13	2				
DEBARY	6		2	8	1			8	1			8	1				
EASTORANGE	4		2	6	1			6	1			6	1				
EAU GALLIE	11		3	14	2			14	2			14	2				
GENEVA	3		2	5	1			5	1			5	1				
KENANSVL	2		2	4	1			4	1			4	1				
KISSIMMEE	25	8	11	36	10			36	10			36	10				
LKBUNAVIST	7		2	9	1			9	1			9	1				
MELBOURNE	30	7	13	43	11			43	11			43	11				
MONTVERDE	3		2	5	1			5	1			5	1				
ORLANDO	196	68	88	284	87	284	87			284	87						
OVIEDO	8		3	11	2			11	2			11	2				
REEDYCREEK	6		2	8	1			8	1			8	1				
SANFORD	30	3	12	42	10			42	10			42	10				
ST CLOUD	7	1	2	9	1			9	1			9	1				
TITUSVILLE	7		2	9	1			9	1			9	1				
WINDERMERE	5		2	7	1			7	1			7	1				
WINTERGRDN	8		3	11	2			11	2			11	2				
WINTERPARK	89	23	37	126	34	126	34					126	34				
WKISSIMMEE	10		3	13	2			13	2			13	2				
TOTAL CODES	526	133	222	748	195	410	121	338	74	284	87	464	108				

Page 13

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

						Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split			
						Area "A" = Orlando & Winter Park Rt Ctr				Area "A" = Orlando Rate Center				Area "A" =			
Existing 407 NPA																	
CO Codes in Service			Forecasted Growth			Area "A"		Area "B" ¹		Area "A"		Area "B"		Area "A"		Area "B"	
		Total	1.25 year		Total	1.25 year		Total	1.25 year		Total	1.25 year		Total	1.25 year		
	Total	Wireless	2Q98	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth
RATE CENTER	Codes	Codes	3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00
TOTAL CODES	526	133	222	748	195	410	121	338	74 ^a	284	87	464	108				
						a	b	a	b	a	b	a	b	a	b	a	b
Area Code Life Under Assumption #1																	
c Number of area codes serving the territory						1		1		1		1		1		1	
d Number of assignable codes in an NPA(s) (748*c)						748		748		748		748		748		748	
e Number of working codes at exhaust (a)						410		338		284		464					
f Number of available codes for assignment (d - e)						338		410		464		284					
g Average forecasted code growth per year 4Q1999-2000 (b/1.25)						97		59		70		86					
h Area code life in years (f/g)						3.5		6.9		6.7		3.3					
Exhaust year						2003		2007		2006		2003					
Area Code Life Under Assumption #2																	
i Number of available codes for assignment (f)						338		410		464		284					
j Total forecasted code growth 4Q1999-2000(b)						121		74		87		108					
k Number of available codes for assignment beyond 2000 (i-j)						217		336		377		176					
l Forecasted code growth per year beyond 2000 (g/2)						48		30		35		43					
m Code life in years (k/l)+1.25 years						5.7		12.6		12.1		5.3					
Exhaust year						2005		2012		2012		2005					
Assumption #1: Code growth continues at 4Q1999 - 2000 levels																	
Assumption #2: Code growth reduced by 50% beyond 2000																	

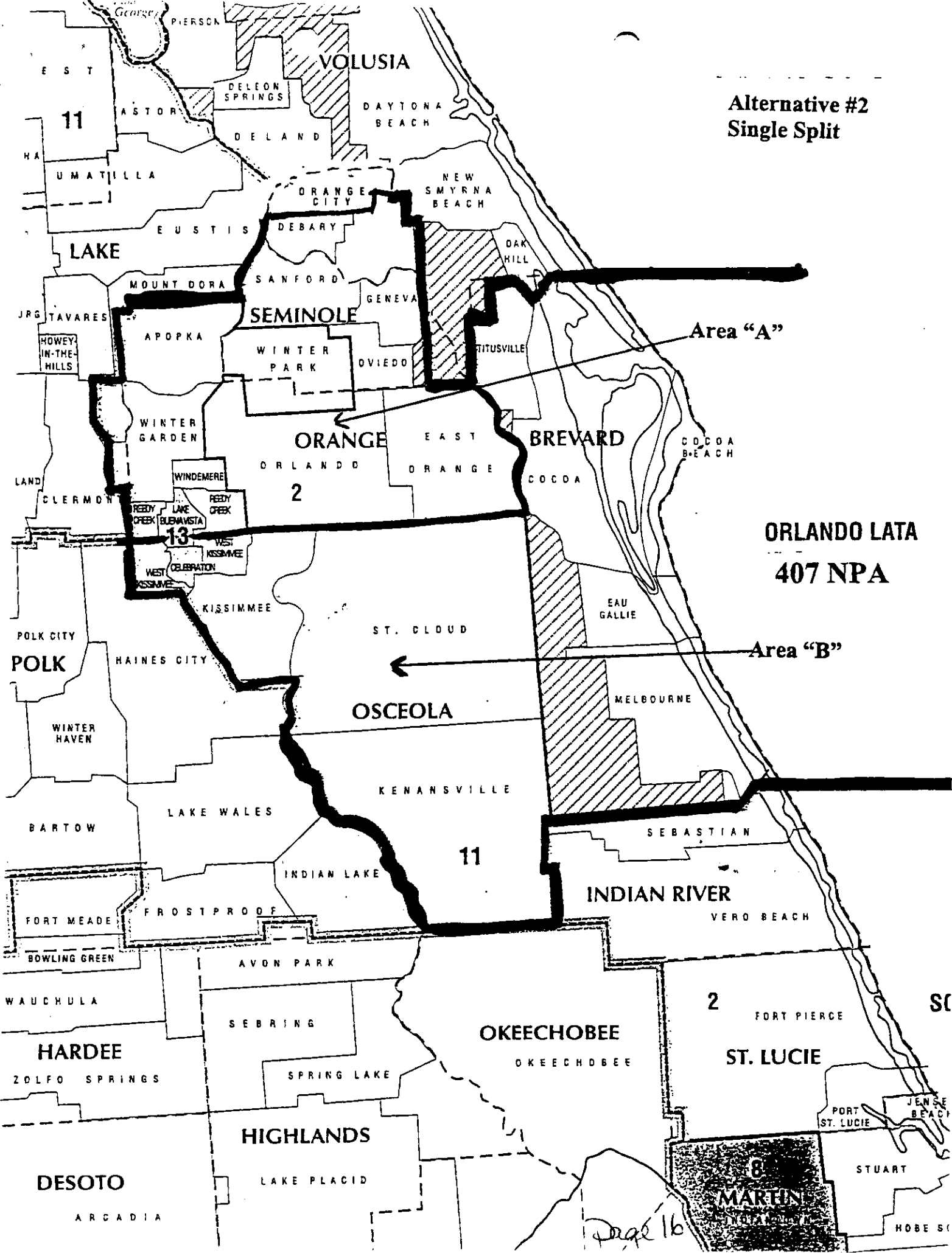
Page 14



Alternative #1
Single Overlay

ORLANDO LATA
407 NPA

**Alternative #2
Single Split**



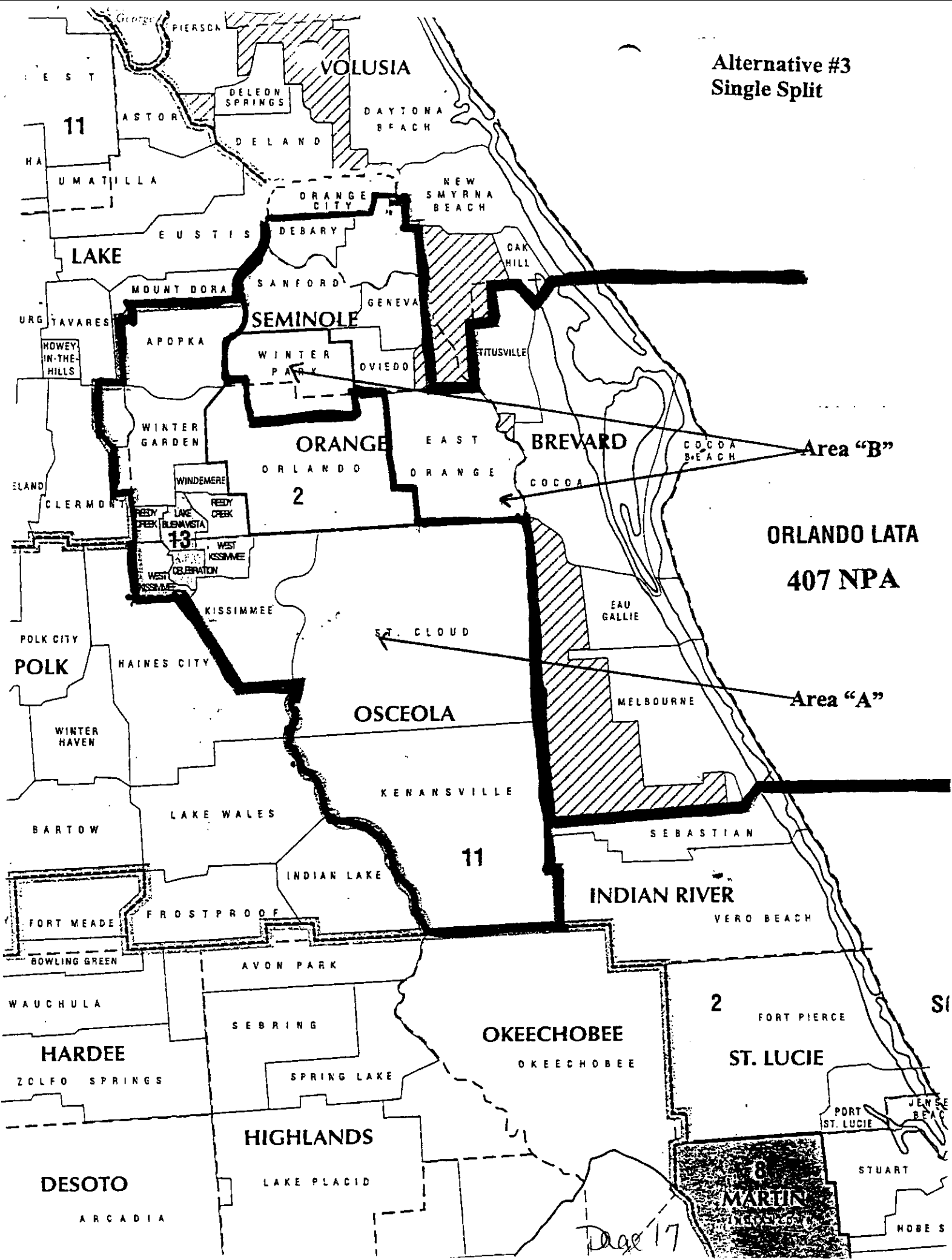
Area "A"

Area "B"

**ORLANDO LATA
407 NPA**

Page 16

Alternative #3
Single Split

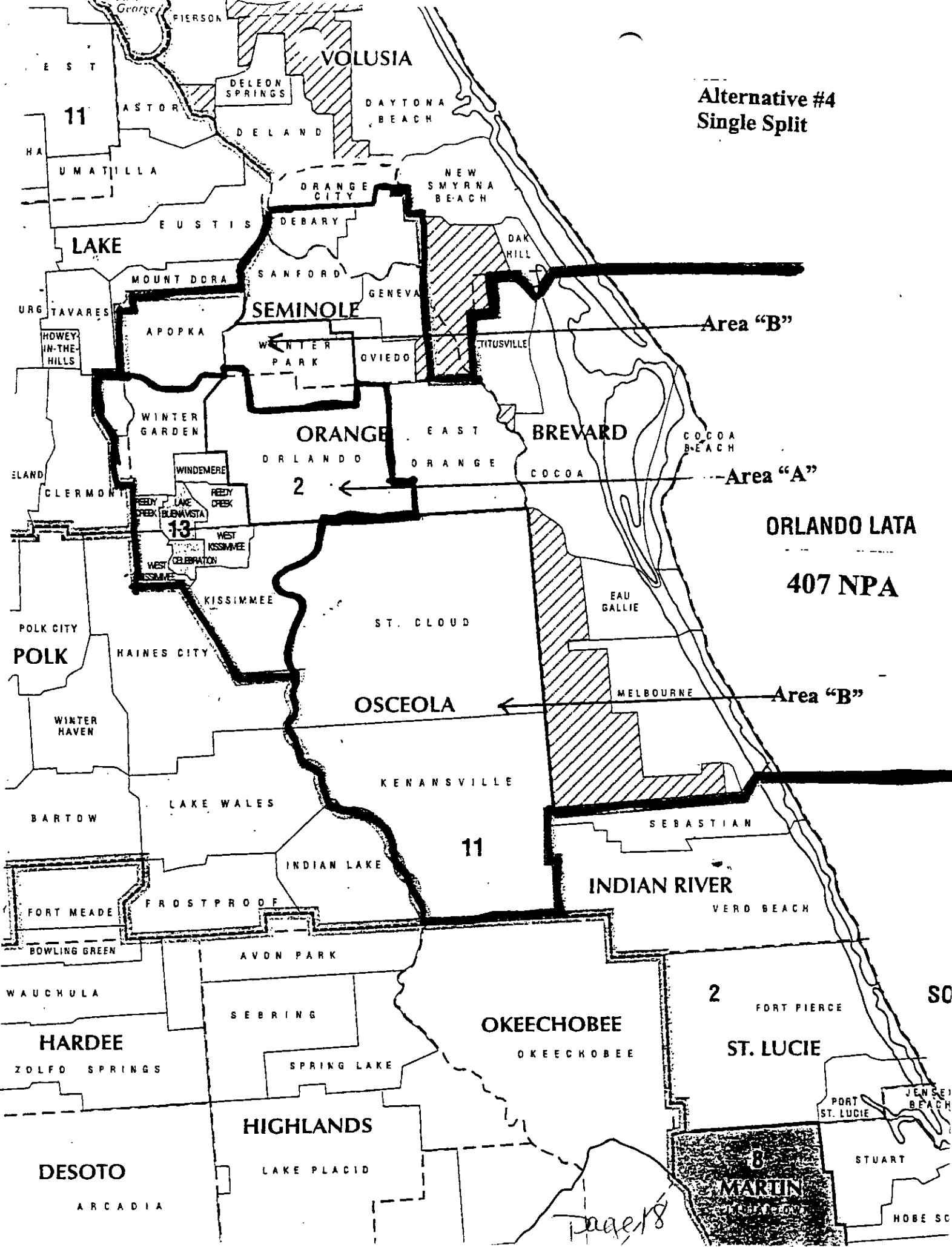


Area "B"

ORLANDO LATA
407 NPA

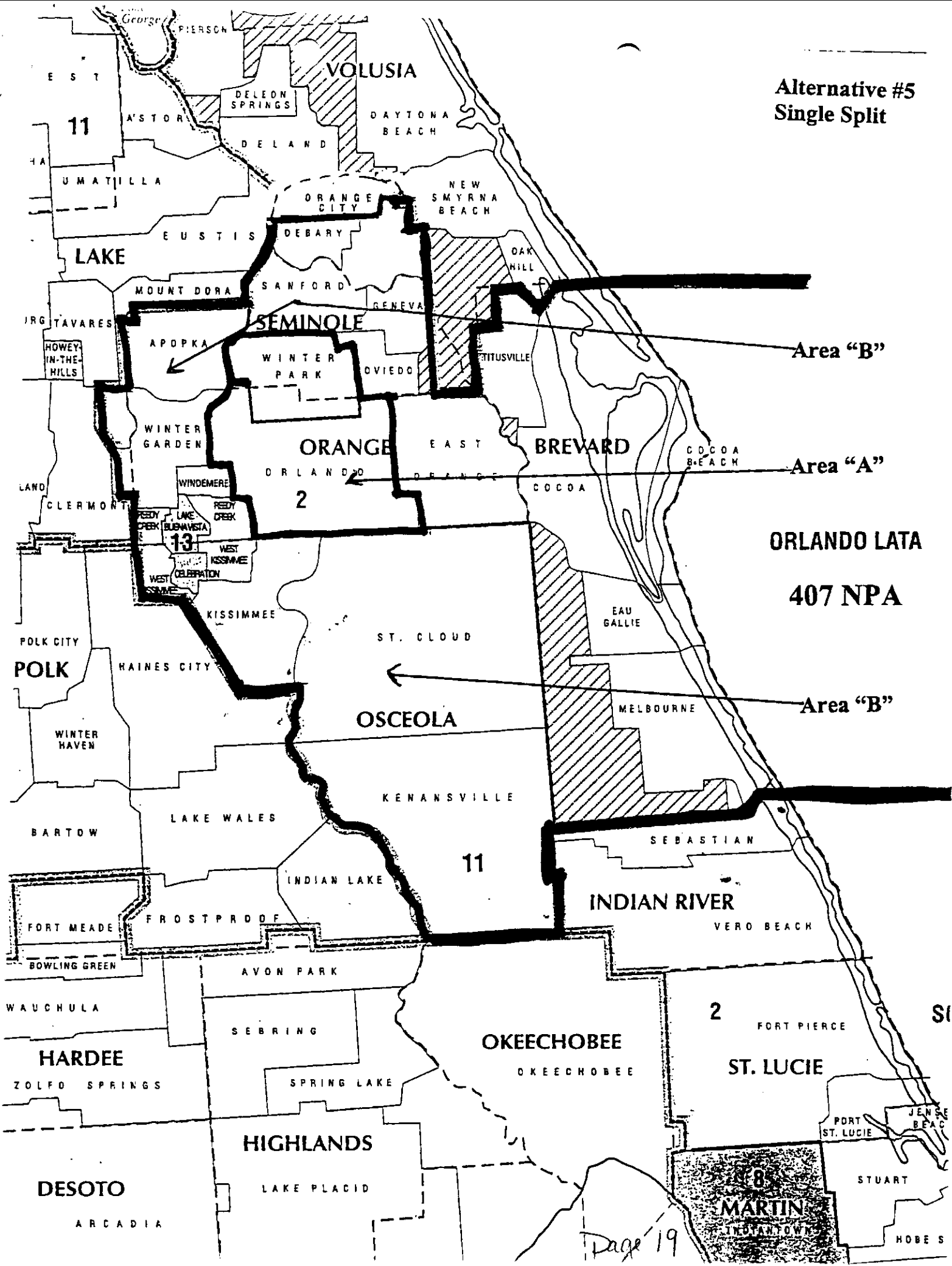
Area "A"

Alternative #4
Single Split



Page 18

**Alternative #5
Single Split**



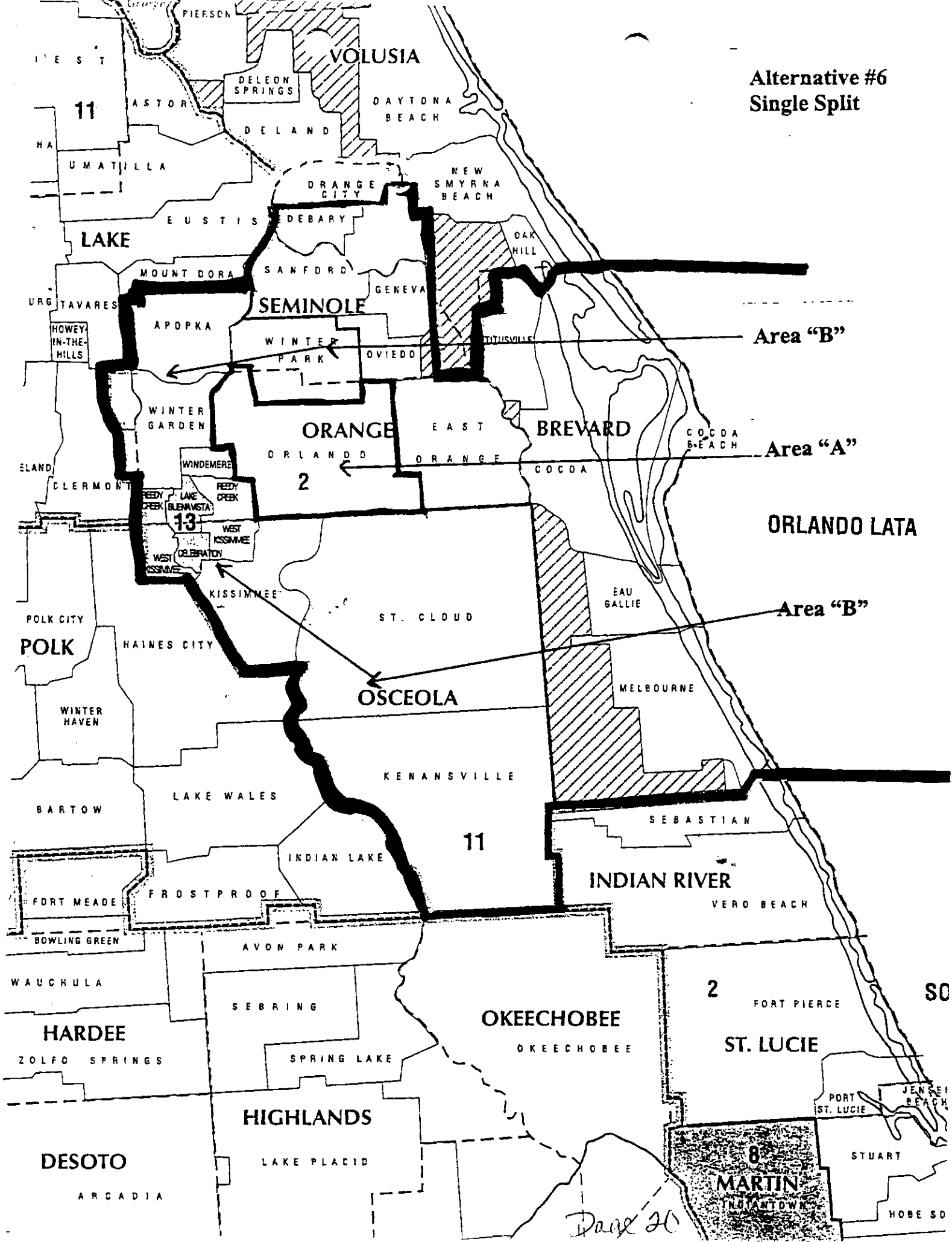
Area "B"

Area "A"

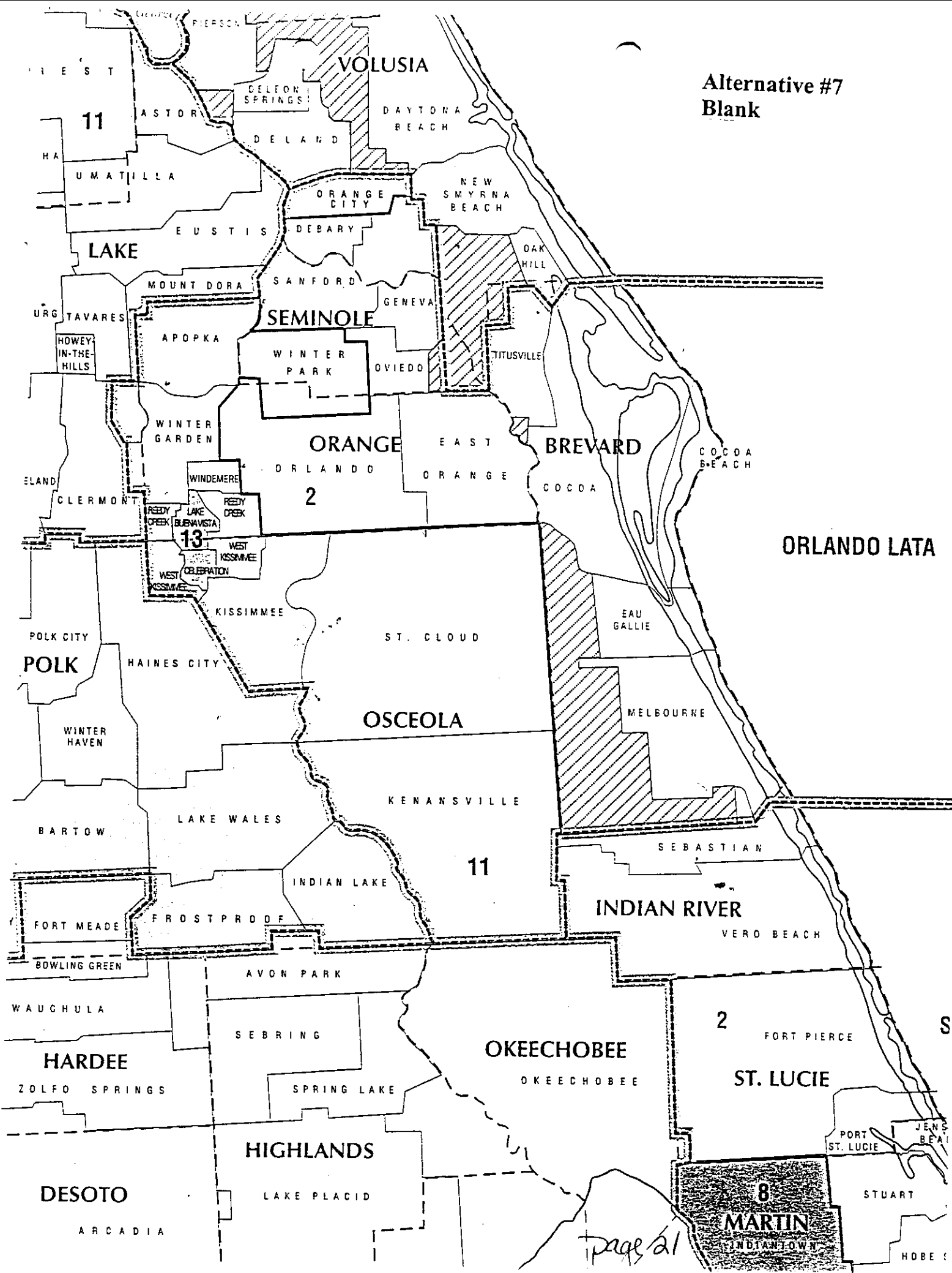
ORLANDO LATA
407 NPA

Area "B"

**Alternative #6
Single Split**



Alternative #7
Blank



page 21

FINAL
407 INDUSTRY RELIEF MEETING
ORLANDO, FLORIDA
MARCH 31, 1998

Exhibit B

WELCOME AND INTRODUCTIONS

Wayne Milby, Lockheed Martin Senior NPA Relief Planner, opened the meeting with introductions and objectives of the meeting. See Attachment #1 for the names of those who were invited to the meeting and those who attended. See Attachment #2 for the agenda of the meeting.

NANPA TRANSITION UPDATE

Mr. Milby gave a brief overview of the events that led to Lockheed Martin IMS being selected as the new NANPA, and highlights of the CO Code and NPA Relief Planning transition followed. Effective February 20, 1998, Lockheed Martin became responsible for all new NPA relief planning activities with support and assistance of the incumbent administrator until the end of the transition period, March 31, 1999. See Attachment #3 for a summary of the CO Code Administration Transition Schedule.

REVIEW OF INDUSTRY GUIDELINES

Mr. Milby reviewed Sections 1 through 12 of the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Issued 4/4/97). This document can be downloaded from the ATIS web site (www.atis.org/atis/clc/inc/incdocs.htm).

REVIEW OF DEMOGRAPHIC DATA

Mr. Milby reviewed U. S. Census Bureau data for Brevard, Orange, Osceola, and Seminole counties. This data may be downloaded from the Census Bureau's web site (www.census.gov/datamap/www/index.html). He also reviewed two documents from the University of Florida's Long-term Economic Forecast 1997: "County Rankings" which included the projected population levels for each county in Florida, including the four counties in the 407 NPA, see attachment #4; and the "Percentage of workers commuting to place of work outside county of residence" which reflected flows of 10 percent or more, see attachment #5.

INITIAL PLANNING DOCUMENT

The Initial Planning Document (IPD) was reviewed and discussed by the industry. The IPD, see attachment #6, included six alternatives: 1 single overlay and 5 single geographic splits. The industry proposed four additional alternatives: 1 single overlay with a boundary realignment to include the "Orange City" rate center and 3 single geographic splits. (These four additional alternatives have been added to the attached IPD)

ELIMINATION OF ALTERNATIVES

It was the consensus of the industry to eliminate Alternative #2 due to extreme imbalance of projected lives of subsequent NPAs. Alternative #3 was eliminated due to disruption of local calling area and to lack of industry support. Alternatives #5, #6, #8, #9 and #10 were eliminated due to lack of industry support.

CONSENSUS ON RELIEF ALTERNATIVE

The three remaining alternatives, #1, #4 and #7 were discussed extensively and the industry came to a consensus on Alternative #1, a single overlay.

SUBMISSION TO FLORIDA PUBLIC SERVICE COMMISSION

It was the consensus of the industry that Lockheed Martin should file the results of the 407 NPA relief meeting with the Florida Public Service Commission, advising the Commission that the industry came to a consensus to recommend Alternative #1, a Single Overlay, to provide relief for the 407 NPA. The industry boarded the following reasons for their recommendation:

1. An overlay offers the longest NPA relief period for all customers.
2. No customers are required to change their telephone numbers. (This provides the least cost to business customers – no need to change letterheads, stationary, signs, etc.)
3. An overlay treats all customers equally, both land line and wireless.
4. An overlay offers the easiest migration path for a future third NPA.
5. An overlay supports Central Florida's traditional communities of interest.
6. An overlay has been successfully implemented in other major metro areas in the U.S.
7. All geographic split options examined require substantial ten digit local dialing by some customers.
8. An overlay is the easiest to implement, both technically and in terms of educating the general public.

IMPLEMENTATION INTERVALS

The industry came to a consensus on the following implementation dates:

November 2, 1998 – Transition Dialing Start

June 21, 1999 – Mandatory 10 Digit Dialing Date

July 21, 1999 – Effective Date for New CO NXX Codes in the Overlay Area Code Agreement was reached to request the Florida PSC render a decision by July 2, 1998.

DIALING PLAN

Consensus was reached to recommend ten-digit dialing for the all services overlay relief plan.

TEST NUMBER

Bell South agreed to obtain and turn-up a test number in the new relief code.

STATEMENTS FOR THE RECORD

AT&T Wireless and AT&T Long Distance submitted the following statement: "AT&T believes that any NPA Relief (i.e. Area Code Plan Relief) must be planned and implemented in a competitively neutral manner so that no particular service provider is unduly favored or adversely affected. This is extremely important in order to ensure that competition develops for local telecommunications services. Even though all relief plans result in some measure of customer inconvenience, AT&T believes that the impact of area code relief on customers should be kept to a minimum while promoting the development of local competition for the long term benefit of Florida consumers.

1. The geographic split is the most familiar and least confusing to customers. Each geographic area retains a unique area code.
2. There are no dialing changes within the home NPA. Customers can continue to dial seven digits within their home area code and 10 digits for toll free local calls outside their home area code.
3. It does not discriminate against new entrant local service providers. Both the incumbent LEC and new entrants will have NXXs in the existing area code and the new area code. All service providers, in terms of number assignments, are placed on equal footing in each area code.
4. The new area code will be populated from the outset, and, therefore is less likely to be seen by customers as undesirable.

Sprint submitted the following statement: "Normally, it is Sprint's position not to support an overlay. However, given the various communities of interest and geography, Sprint will support the overlay proposed for the 407 relief."

BellSouth submitted the following statement: "BellSouth supports the industry consensus for the overlay relief of the 407 NPA. Our desire is to minimize the impact on all communications customers in the affected area. Should the overlay relief be deemed inappropriate, we support Alternative No. 7 in the belief that this would be the least disruptive to communities of interest."

MCI submitted the following statement: "MCI supports the geographical split (Alternative No. 4) relief plan for Orlando, FL (NPA 407). The relief period for this plan is balanced in the old and new NPAs."

APPROVAL OF MINUTES

It was the consensus of the industry to convene via conference call to approve the minutes of the 407 NPA Relief Meeting on Tuesday, April 14, 1998 at 2:00 P.M. Eastern Standard Time. *The bridge number is 805-240-9673 Access Code 880426.* The target date for the filing to the Commission will be April 22, 1998.

Init	Last Name	First Name	Company	Phone	Fax
	Snider	Vicki	BST Ingrastructure Planning	954-928-4740	954-772-5105
	Ryan	William	Cable Vision of New York City	718-991-6000	718-378-2625
	Kaminer	Rick	Carrier Paging	516-669-2102	516-669-6455
	Huntley	David	Cellular One	617-462-5094	617-462-5024
	Swanson	Nicole	Cellular One	617-462-7073	617-462-5024
	Mosca	Paul	Cellular One	617-462-7048	617-462-5975
	Saur	Paul	Cellular One	617-462-5090	617-462-5975
	Ross	Kathy	Citizens Telecom	214-365-3340	214-365-4059
	Eldredge	Paul	Comay Telco Inc.	508-390-9000	508-872-2284
	Pressler	Dave	Communications, Inc.	800-476-3427	334-626-3171
	Plott	David	CONXUS Network, Inc.	864-239-5311	864-241-8197
	Knapp	Patricia	Crown Point Tele Corp	518-597-3300	
	Marshall	Fred	DataCom	318-234-3438	318-269-1284
	Barker	Steven	Delhi Telephone Company	607-746-2111	607-746-7991
	Maytun	Kurt	Erie Shore Communication	716-673-3031	716-679-4005
	Widell	Ralph	Florida Cellular Services	850-413-6550	850-413-6551
	Greer	Stan	Florida PSC	850-413-6562	850-413-6563
X	Sirianni	MaryRose	Florida PSC	850-413-6564	850-413-6565
	Schwartz	Mike	General Comm.&Elec. Corp	516-501-0466	516-501-0464
	Chavez	John	General Paging	305-267-5554	305-267-5455
	McDowell	Lee	Hyperion	814-274-6858	814-274-0498
	Bruner	Richard	Hyperion Telecom Of Syracuse	315-234-5678	315-234-5000
	Klein	Joe	Intelcom Group Access Svcs	303-414-5203	303-414-5858
	Rigas	John	International Cablevision Inc	814-274-9830	
	Alexander	Bridget	ITCA DeltaCom	706-645-9026	706-645-9077
	Bordy, Sr.	G. Scott	KMC Southeast Corp.	205-922-1000	205-922-9944
	Roberts	Sherita	ILDDS WorldCom	918-590-8529	918-590-5598
	Guariglia	Annette	MCI	914-312-2287	914-312-2287
	Faul	Kelly	MCI	703-918-0457	703-918-6814
X	Williams	Frederick	MCI Long Distance	972-918-1816	972-918-1821
	Harvey	Karen	MCI Metro	703-749-7173	703-749-7007
	Griffith	Georgia	Media One d/b/a Amer Ca Sys	914-762-8684	914-762-0799
	Gonzalez	Izzy	MediaOne	904-619-3323	904-619-3355
	Langford	Thomas	Mercury Paging & Comm.	914-471-0833	914-471-7626
	Reid	Sean	Metrocall	850-438-1653	850-432-9208
	Wheeler	Todd	MobileComm	601-977-1570	601-977-1769
	Hauk	Wendy	IMPC	954-968-1913	954-968-5392
	Boyer	James	Nevada Wireless	702-353-3600	702-353-3621
	Foss	L.Theodore	Newport Telephone Co. Inc	315-845-8112	315-845-8662
	Guifford	Jenifer	Nextel	617-839-5622	617-839-5912
X	Salpietra	Carl	Nextel	407-948-2142	407-667-1240
X	Williams	Terry	Nextel Communications, Inc.	407-948-2145	407-667-1240
	Gonzalez	Daniel	NEXTLINK Communication, Inc	202-721-0999	202-721-0995
	Hatch	Alice	Omnipoint	954-457-5744	954-457-5705
	McCarthy	James	Onedia County Rural Tel Co.	315-865-5201	315-865-5211
	Locke	Jerry	Orlando Tel. Co.	407-996-8900	407-996-8901
	Rios	Mireya	PageMart	214-765-3853	214-765-4925
	Winginton	Bill	PageNet	972-885-5162	972-985-6519
	Wiginton	Bill	Pagenet	972-985-5162	972-985-4081
	Grant	Dennis	PageNet Florida Systems	954-922-9644	954-922-9118
	LaPlante	Doug	PageNet Florida Systems	954-922-9644	954-922-9118
	Merritt	Garey	PageNet of America	407-649-8007	407-872-3808
	Laughlin	Russell	Pagers Unlimited	504-273-5405	504-273-5405
	Beissert	Eric	Paging Network, Inc.	770-368-1011	770-368-1048
	Tomblin	Jeff	Paging Network, Inc.	972-985-5162	972-985-6519
	Beary	James	Porta-Phone	850-561-8996	850-841-7100

Init	Last Name	First Name	Company	Phone	Fax
	Go	Richard	360 Communications	773-399-2333	773-399-7201
	Messer	Steve	360 Communications	850-845-4050	850-847-4671
	Hudson	Heather	A+ Network-Florida (a MetroCall Co)	850-890-7243	850-432-9208
	Stipe	Bill	ACSI of AL	301-617-4220	301-483-7667
X	Reichenberg	Tom	Aerial Communications	813-243-3205	813-243-1906
	Cabrera	Bill	AGR Electronics	305-556-8438	305-827-1005
	Horton	Chris	AirTouch Cellular	404-257-5314	404-257-5066
	Mitchell	Tim	AirTouch Paging	561-994-3800	561-994-5975
	Roberts	Steve	AirTouch Paging	972-860-3312	972-860-3248
	Baker	Barry	AirTouch Paging	904-396-1510	904-396-4708
X	Wall	Billy	AirTouch Paging	407-741-5581	407-740-7624
	Alberico	David	All Florida Paging	407-260-2092	407-260-5823
	Jackson	Lester	Allsafe Paging	904-268-7233	904-268-4504
	Hager	Doug	Alltel Communications, Inc.	704-845-7275	704-845-7382
	Deese	Elaine	Alltel Communications, Inc.	704-845-7290	704-845-7229
	Rutherford	Pam	Alltel Florida	704-845-7100	704-841-3231
	Robertell-Hudson	Pat	Alltel Northeast Market Area	216-650-7232	216-650-7264
	Powers	Ray	American MetroCom Corp.	504-598-9000	504-598-9010
	Thompson	Doug	Ameripage, Inc.	305-231-8008	305-827-4906
	Fredlund	Andy	Arch Communications	561-912-7410	561-912-7450
	McGee	Thomas	AT&T	770-785-5872	770-602-2455
	Mongillo	Richard	AT&T Local Number Administration	908-771-2690	908-771-8268
X	Phillips	Bubba	AT&T Long Distance	770-785-5773	770-929-4348
X	Gianella	John	AT&T Wireless	561-775-4444	561-775-4253
	Ratliff	Thomas	AT&T Wireless	512-436-7435	512-436-7417
	Cahall	Richard	AT&T Wireless	561-775-4248	561-775-4256
	Meins	Charlene	AT&T Wireless	425-803-1232	425-828-8609
	Reynaldo	Luis	AT&T Wireless Services	305-592-5425	305-592-5036
X	Slavik	Ron	AT&T Wireless Services	407-667-5682	407-875-0422
	Baker	Doug	Baker's Elect. & Comm.	904-752-6494	904-752-6493
	Rappaport	Bruce	BAM	908-306-7862	908-306-7735
	Taylor	Charles	Bassett Healthcare	607-547-6600	607-547-6604
X	Gonzalez	Julian	Beep-Net	305-388-3100	305-388-9130
	McDermott	Steve	Bell Atlantic	212-285-7323	917-965-0102
	Gunter	Beth	Bell Atlantic- South	410-736-6811	410-736-6066
X	Benson	Al	BellSouth	904-350-3359	904-355-8210
X	Lunceford	Gene	BellSouth	205-321-2013	205-321-4754
X	Lewis	Charles	BellSouth	404-527-0736	404-873-6432
X	Morgan	Barbara	BellSouth	904-350-2825	904-350-4150
	Sawyer	Bill	BellSouth	904-350-4541	904-355-8210
X	Smith	Gordon	BellSouth	904-350-7206	904-350-4150
X	Tubrough	Wayne	BellSouth	850-224-5128	850-224-7209
X	Allington	Gary	BellSouth	407-237-3319	407-237-3054
X	Childers	Judy	BellSouth - Reg. & Ext. Affairs	305-347-5414	305-577-3027
	Frazee	George	BellSouth - Reg. & Ext. Affairs	850-224-5139	850-222-8640
	Burleson	Ron	BellSouth Cellular	404-249-0455	404-249-0453
X	Israel	Susan	BellSouth Cellular	404-249-0478	404-249-0453
	Martin	Charles	BellSouth Long Distance Inc.	770-352-3249	770-352-3184
	Jardon	Mario	BellSouth Mobility	561-995-3583	561-995-3567
X	Anderson	Sherry	BellSouth Mobility, Inc.	407-446-0008	407-805-8914
	Brege	Jim	BellSouth Mobility, Inc.	407-247-0002	407-805-8914
X	Tatem	Tim	BellSouth Mobility, Inc.	407-719-0010	407-805-8914
X	Hobson	Elizabeth	BellSouth Mobility, Inc.	407-444-0017	407-805-8914
X	McCullough	Doug	BellSouth Telecommunications	205-977-5069	205-977-7877
	Goodgine	Janice P.	BellSouth Telecommunications	954-928-4711	954-492-1752
	Kelly	Brian	Berkshire Telephone Corp.	518-758-9951	518-758-9978

Init	Last Name	First Name	Company	Phone	Fax
X	Sanders	John F.	Preferred Networks	770-416-5931	770-734-0936
	Cairon	Frank	PrimeCo PCS	904-348-3640	904-348-3618
	Hunter	Paul	PrimeCo PCS, L.P.	813-615-4813	813-615-4901
X	Azif	Jeremy	PrimeCo Personal Communications	817-258-1241	817-258-1202
	Nugue	Carlos	PrimeCo Personal Communications	561-995-5723	561-995-5514
	Blackburn	Karen A.	PrimeCo Personal Communications L.P.	904-348-3623	904-348-3618
	Goodell	Paul	Priority Communications	561-750-8899	561-391-4705
	Jobe	Jack	Priority Paging Inc.	904-730-6000	904-730-2012
	Lezcano	Ed	Rainbow Paging	305-593-7711	305-593-8844
	Lipsky	Ted	Rainbow Paging	305-594-7711	305-593-8844
X	Craven	Brian	Sprint	407-889-6807	407-884-0206
X	Green	Barbara	Sprint	407-830-3245	407-332-9365
X	Johnson	Jeannie	Sprint	407-830-3044	407-332-9365
X	Foley	Tom	Sprint	407-889-6168	407-884-1919
	Eicholz	Kathy	Sprint Communications	913-534-2605	913-534-5366
	Schreier	Fran	Sprint PCS	816-559-5290	816-559-5093
X	Clark	Melanie	Sprint PCS	407-475-0616	407-475-0524
	Valenzi	Steven	Sprint Spectrum L.P.	954-423-5250	954-423-5267
	Shoenfelt	Terry	Strategic Technologies, Inc.	305-229-6591	305-229-6580
	Krug	John	TCG Florida	718-355-2762	718-355-4804
X	Brannon	Debby	Teligent	703-762-5332	703-762-5450
	Gerstemeier	Richard	Time Warner AXS of Florida	407-215-6800	407-215-6803
	Hunter	Dena	Time Warner Communications	303-705-1818	303-705-1874
X	Newkirk	Teresa	Time Warner Telecom	303-705-4663	303-705-1874
X	Potter	Paul	Time Warner Telecom	407-215-6850	407-215-6801
X	Thakur	Tony	Time Warner Telecom	407-215-6800	407-215-6803
	Ryan	Mark	Time Warner-Potsdam	315-265-4965	315-268-8002
	Sheehan	Dan	Time Warner-Staten Island	718-390-7031	718-816-8433
	Cotter	Mary	Time Warner-Syracuse	315-463-2288	315-463-2088
	Cullin	Mike	Time Warner-Syracuse Div.	315-463-2288	315-234-5015
	Reuter	Larry	United States Cellular	352-665-4332	652-665-4492
	Brooks	Elizabeth	USTA	202-326-7264	202-218-3540
X	Campbell	David	Vista-United Telecommunications	407-827-2112	407-827-2128
	Lukowski	Ray	Winstar	703-645-5463	703-645-5395
	Kenworthy	Pamela	WorldCom	973-	973-889-2639

**407 NPA RELIEF INDUSTRY MEETING
TUESDAY, MARCH 31, 1998**

**Sheraton Orlando North Hotel
Maitland, Florida**

- 8:30 Coffee and Registration
- 9:00 Welcome and Introductions
- 9:10 NANPA Transition Update
- 9:20 Minutes and "Statements For The Record"
- 9:25 Industry Guidelines
- 9:35 Review Initial Planning Document
- 10:15 Break
- 10:30 Review Initial Planning Document
- 11:00 Additional Alternatives from Industry
- 11:45 Lunch (On Your Own)
- 12:45 Elimination Of Alternatives
- 1:00 Consensus On Relief Alternative
- 2:15 Consensus on Dialing Plan
- 2:30 Break
- 2:45 Consensus on Implementation Intervals
- 3:15 Industry Commitment For Test Number
- 3:30 Consensus on NANPA Filing Industry Efforts With Commission
- 3:40 Set Date For Conference Call To Approve Minutes
- 3:45 Complete NANPA Survey
- 4:00 Adjourn

**NANPA Transition Plan
CO Code Administration and NPA Relief Planning**

**CO Code Administration - Transition
Order and Timing**

Exhibit E

1998	Order	Region	Transition Period	Interval
	1	Pacific Telesis	April 13 - May 8, 1998	4 weeks
	2	U.S. Virgin Islands	May 11 - May 15, 1998	1 week
	3	Florida - GTE	May 18 - June 5, 1998	3 weeks
	4	Cincinnati Bell	June 8 - June 19, 1998	2 weeks
	5	BellSouth	July 6 - Aug. 14, 1998	6 weeks
	6	U S WEST	Aug. 17 - Sept. 4, 1998	3 weeks
	7	Southern New England Tel.	Sept. 14 - Sept. 25, 1998	2 weeks
	8	Bell Atlantic (North)	Oct. 5 - Oct. 23, 1998	3 weeks
	9	Bell Atlantic (South)	Oct. 26 - Nov. 13, 1998	3 weeks
1999				
	10	Southwestern Bell	January 11, 1999	4 weeks
	11	Hawaii - GTE	Feb. 8, 1999	2 weeks
	12	Puerto Rico	March 1, 1999	2 weeks
	13	Ameritech	March 15, 1999	4 weeks
	14	Northern Mariana Islands	April 19, 1999	1 week
	15	Guam	May 3 1999	1 week
	16	AT&T Alascom	June 7, 1999	2 weeks

NANPA feels this is an aggressive, but very workable, order. This would allow the CO code administration transition from the incumbent code administrators to NANPA to be completed in less than 18 months. We are open to any upgrades and suggestions the COCTTF has regarding this proposed order and timing of transition.

It is recognized that possible labor activity in 1998 could adversely impact this schedule. In that event, the incumbent code administration staff should make every effort to be declared "essential" so that the code transition activity may proceed as planned.

County Rankings

Attachment #4

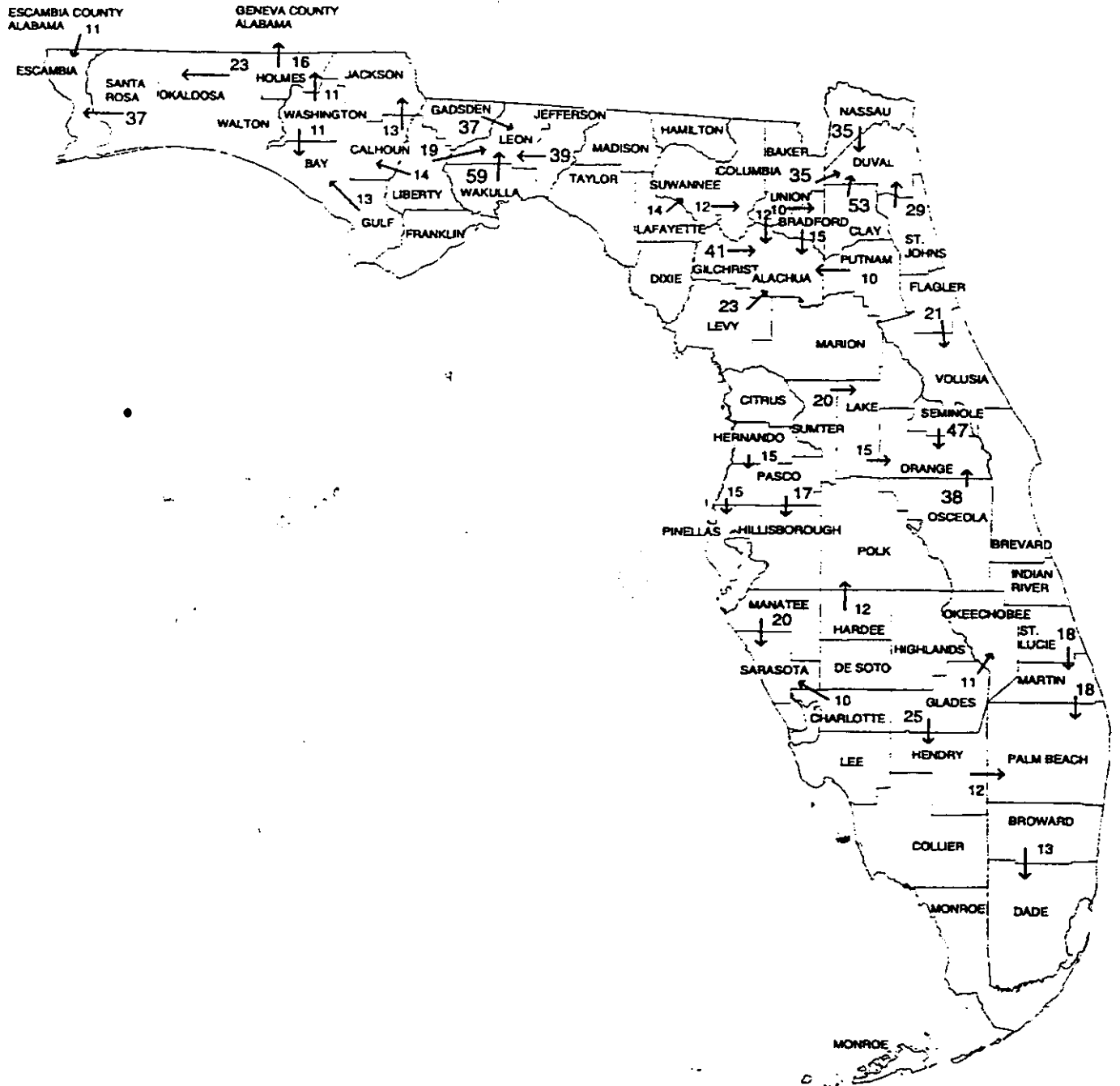
Population level (number of persons)

County	1970		1980		1990		1995		2010	
	Level	Rank	Level	Rank	Level	Rank	Level	Rank	Level	Rank
Alachua	105,582	14	151,744	16	182,250	19	199,328	19	244,266	21
Baker	9,383	55	15,395	51	18,597	51	20,441	51	25,240	51
Bay	75,830	20	98,324	22	127,420	24	139,841	24	174,208	27
Bradford	14,745	45	20,074	47	22,576	49	24,365	49	28,229	49
Brevard	230,340	9	274,618	9	401,852	9	447,024	8	575,774	8
Broward	629,713	2	1,025,156	2	1,261,473	2	1,369,928	2	1,686,744	2
Calhoun	7,646	59	9,354	50	11,047	60	12,087	62	14,479	63
Charlotte	28,062	35	59,450	29	112,266	25	128,286	26	181,931	25
Citrus	19,890	39	55,703	31	94,183	30	106,099	30	145,871	30
Clay	32,565	31	67,752	25	106,437	27	121,644	27	171,886	28
Collier	38,958	26	87,261	24	154,540	20	187,998	20	284,401	18
Columbia	25,458	37	35,619	39	42,814	38	50,750	37	68,871	37
Dade	1,279,243	1	1,652,215	1	1,943,797	1	2,019,137	1	2,358,427	1
De Soto	13,255	48	19,195	48	23,974	48	26,737	48	34,209	48
Dixie	5,487	62	7,737	62	11,069	59	12,488	61	17,285	59
Duval	530,297	3	572,208	6	675,652	7	720,157	7	848,809	7
Escambia	206,486	10	234,564	11	263,473	15	284,194	15	331,150	15
Flagler	4,466	63	11,273	55	29,223	43	37,417	41	64,717	39
Franklin	7,051	60	7,683	63	9,031	64	10,287	64	12,799	64
Gadsden	39,228	25	41,552	37	41,377	40	44,644	40	52,106	42
Gilchrist	3,600	65	5,895	65	9,748	63	11,994	63	17,601	58
Glades	3,724	64	6,020	64	7,651	65	8,590	65	11,606	65
Gulf	10,121	54	10,696	58	11,517	57	13,266	58	16,319	60
Hamilton	7,808	58	8,743	61	10,941	61	12,631	60	17,951	57
Hardee	15,051	43	20,405	45	19,550	50	22,993	50	24,212	52
Henry	11,954	50	18,694	49	26,733	46	29,699	47	38,473	47
Hernando	17,594	40	45,871	36	102,085	28	118,666	28	174,943	26
Highlands	29,983	33	48,034	35	68,988	35	77,615	35	100,502	34
Hillsborough	494,843	5	650,168	4	836,303	5	896,229	4	1,095,015	4
Holmes	10,854	53	14,737	53	15,827	55	17,503	55	19,116	56
Indian River	36,307	29	60,903	28	90,910	31	101,002	31	132,575	33
Jackson	34,552	30	39,275	38	41,427	39	46,838	39	56,707	40
Jefferson	8,719	56	10,740	57	11,467	58	13,617	57	16,199	61
Lafayette	2,879	67	4,052	67	5,604	66	6,679	67	9,317	67
Lake	70,126	22	105,863	21	153,413	21	178,421	21	248,270	20
Lee	107,558	13	207,907	12	337,618	11	378,940	11	506,261	11
Leon	104,491	15	149,344	18	194,147	18	218,853	18	278,200	19
Levy	12,819	49	20,142	46	26,124	47	30,022	46	40,227	45
Liberty	3,432	66	4,279	66	5,582	67	6,946	66	9,611	66
Madison	13,568	47	14,932	52	16,553	54	18,477	54	21,510	54
Manatee	97,862	16	150,360	17	212,658	16	234,375	16	299,558	17
Marion	70,563	21	124,027	19	196,327	17	226,191	17	309,501	16
Martin	28,625	34	64,902	26	101,582	29	112,430	29	151,156	29
Monroe	52,974	23	63,510	27	78,379	34	83,662	34	97,907	35
Nassau	20,815	38	33,108	40	44,197	37	49,583	38	66,051	38
Okaloosa	88,682	17	110,616	20	144,399	23	163,741	23	208,581	24
Okeechobee	11,556	52	20,409	44	29,769	42	32,964	44	43,324	44
Orange	348,410	7	474,054	7	684,086	6	763,402	6	1,024,778	5
Osceola	25,941	36	50,803	34	109,589	26	137,999	25	213,153	23
Palm Beach	353,500	6	587,118	5	869,127	3	968,808	3	1,267,138	3
Pasco	78,557	19	196,661	14	282,236	13	307,267	13	386,198	13
Pinellas	529,579	4	732,043	3	852,871	4	877,313	5	964,263	6
Polk	231,100	8	323,635	8	407,717	8	444,675	9	551,516	9
Putnam	36,854	28	50,821	33	65,305	36	69,603	36	83,563	36
St. Johns	31,360	32	51,705	32	84,437	32	99,051	32	141,899	31
St. Lucie	51,389	24	88,987	23	151,661	22	172,221	22	240,539	22
Santa Rosa	38,203	27	56,568	30	82,145	33	96,660	33	136,855	32
Sarasota	122,662	12	204,409	13	279,132	14	302,885	14	374,013	14
Seminole	85,309	18	181,521	15	290,397	12	325,948	12	439,837	12
Sumter	15,019	44	24,449	41	31,683	41	36,793	42	55,702	41
Suwannee	15,724	42	22,415	42	26,916	45	30,821	45	40,119	46
Taylor	13,611	46	16,539	50	17,174	52	18,527	53	20,206	55
Union	8,399	57	10,195	59	10,430	62	12,651	59	16,116	62
Volusia	171,060	11	261,114	10	372,393	10	404,395	10	511,230	10
Wakulla	6,410	61	10,934	56	14,256	56	17,156	56	26,707	50
Walton	16,273	41	21,347	43	28,131	44	33,797	43	45,329	43
Washington	11,567	51	14,544	54	16,975	53	19,225	52	23,371	53
Florida	6,865,670		9,840,371		13,009,211		14,213,968		17,896,724	

See notes at end of volume.

Page 30

**Figure 1. - Percentage of workers commuting to place of work outside county of residence
(flows of 10 percent or more)**



INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

						Alternative #1		Alternative #2 - Single Split				Alternative #3 - Single Split				Alternative #4 - Single Split			
						Single Overlay		Area "A" = Orange & Seminole Counties				Area "A" = Orange & Osceola Counties				Area "A" = Part of Orange & Osceola			
						407 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
		Forecasted Growth				Total		Total		Total		Total		Total		Total		Total	
		2Q98		1.25 year		1.25 year		1.25 year		1.25 year		1.25 year		1.25 year		1.25 year		1.25 year	
		At		Growth		At		At		At		At		At		At		At	
		Exhaust		4Q99 - 00		Exhaust		4Q99 - 00		Exhaust		4Q99 - 00		Exhaust		4Q99 - 00		Exhaust	
		3Q99		4Q99 - 00		3Q99		4Q99 - 00		3Q99		4Q99 - 00		3Q99		4Q99 - 00		3Q99	
		Wireless		Wireless		Wireless		Wireless		Wireless		Wireless		Wireless		Wireless		Wireless	
		Number		Number		Number		Number		Number		Number		Number		Number		Number	
		Codes		Codes		Codes		Codes		Codes		Codes		Codes		Codes		Codes	
		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service		CO Codes in Service	
		Rate Center		Rate Center		Rate Center		Rate Center		Rate Center		Rate Center		Rate Center		Rate Center		Rate Center	
ATOPKA	9		3	12	2	12	2	12	2			12	2					12	2
CELEBRATN	1		2	3	1	3	1			3	1	3	1			3	1		
COCOA	49	23	21	70	20	70	20			70	20			70	20			70	20
COCOA BEACH	10		3	13	2	13	2			13	2			13	2			13	2
DEBARY	6		2	8	1	8	1	8	1					8	1			8	1
EASTORANGE	4		2	6	1	6	1	6	1					6	1			6	1
EAU GALIE	11		3	14	2	14	2			14	2			14	2			14	2
GENEVA	3		2	5	1	5	1	5	1					5	1			5	1
KENANSVL	2		2	4	1	4	1			4	1	4	1					4	1
KISSIMEE	25	8	11	36	10	36	10			36	10	36	10					36	10
LKBUNAVIST	7		2	9	1	9	1	9	1			9	1			9	1		
MELBOURNE	30	7	13	43	11	43	11			43	11			43	11			43	11
MONTVERDE	3		2	5	1	5	1	5	1			5	1			5	1		
ORLANDO	196	68	88	284	87	284	87	284	87			284	87			284	87		
OVIDO	8		3	11	2	11	2	11	2					11	2			11	2
REEDYCREEK	6		2	8	1	8	1	8	1			8	1			8	1		
SANFORD	30	3	12	42	10	42	10	42	10					42	10			42	10
ST CLOUD	7	1	2	9	1	9	1			9	1	9	1					9	1
TITUSVILLE	7		2	9	1	9	1			9	1			9	1			9	1
WINDERMERE	5		2	7	1	7	1	7	1			7	1					7	1
WINTERGRDN	8		3	11	2	11	2	11	2			11	2			11	2		
WINTERPARK	89	23	37	126	34	126	34	126	34					126	34			126	34
WKISSIMEE	10		3	13	2	13	2			13	2	13	2					13	2
ORANGECITY	10																		
TOTAL CODES	536	133	222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89

Page 1. of 6

Page 32

Attachment 6

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

					Alternative #1		Alternative #2 - Single Split				Alternative #3 - Single Split				Alternative #4 - Single Split								
					Single Overlay		Area "A" = Orange & Seminole Counties				Area "A" = Orange & Osceola Counties				Area "A" = Part of Orange & Osceola								
					407 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"						
					Forecasted Growth																		
					Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year					
CO Codes in Service					At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth					
Wireless					3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00				
Existing 407 NPA																							
TOTAL CODES	526				222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89		
					a	b		a	b	a	b	a	b	a	b	a	b	a	b	a	b		
Area Code Life Under Assumption #1:																							
c Number of area codes serving the territory								2		1		1		1		1		1		1			
d Number of assignable codes in an NPA(s) (748*c)								1496		748		748		748		748		748		748			
e Number of working codes at exhaust (a)								748		534		214		401		347		376		372			
f Number of available codes for assignment (d - e)								748		214		534		347		401		372		376			
g Average forecasted code growth per year 4Q1999-2000 (b/1.25)								156		115		41		88		68		85		71			
h Area code life in years (f/g)								4.8		1.9		13.1		3.9		5.9		4.4		5.3			
Exhaust year								2005		2002		2013		2004		2006		2004		2005			
Area Code Life Under Assumption #2:																							
i Number of available codes for assignment (f)								748		214		534		347		401		372		376			
j Total forecasted code growth 4Q1999-2000(b)								195		144		51		110		85		106		89			
k Number of available codes for assignment beyond 2000 (i-j)								553		70		483		237		316		266		287			
l Forecasted code growth per year beyond 2000 (g/2)								78		58		20		44		34		42		36			
m Code life in years (k/l)+1.25 years								8.3		2.5		24.9		6.6		10.5		7.5		9.3			
Exhaust year								2008		2002		2025		2006		2010		2007		2009			
Assumption #1: Code growth continues at 4Q1999-2000 levels																							
Assumption #2: Code growth reduced by 50% beyond 2000																							

Page 2 of 6

Page 33

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

						Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split			
						Area "A" = Orlando & Winter Park Rt Ctr				Area "A" = Orlando Rate Center				Area "A" = Orange & Seminole Counties			
														less Reedy Creek and Windermere Rate Centers			
						Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
		Forecasted Growth				Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year
CO Codes in Service		2Q98	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	
		3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	
Number																	
RATECENTER	Codes																
AIOTKA	9	3	12	2			12	2			12	2			12	2	
CELEBRATN	1	2	3	1			3	1			3	1					
COCOA	49 23	21	70	20			70	20			70	20			3	1	
COCOA BEACH	10	3	13	2			13	2			13	2			70	20	
DEBARY	6	2	8	1			8	1			8	1	8	1	13	2	
EASTORANGE	4	2	6	1			6	1			6	1	6	1			
EAU GALLIE	11	3	14	2			14	2			14	2			14	2	
GENEVA	3	2	5	1			5	1			5	1	5	1			
KENANSVL	2	2	4	1			4	1			4	1			4	1	
KISSIMMEE	25 8	11	36	10			36	10			36	10			36	10	
LEKUNAVIST	7	2	9	1			9	1			9	1			9	1	
MELBOURNE	30 7	13	43	11			43	11			43	11			43	11	
MONTVERDE	3	2	5	1			5	1			5	1	5	1			
ORLANDO	196 68	88	284	87	284	87			284	87			284	87			
OVIEDO	8	3	11	2			11	2			11	2	11	2			
REEDY CREEK	6	2	8	1			8	1			8	1			8	1	
SANFORD	30 3	12	42	10			42	10			42	10	42	10			
ST CLOUD	7 1	2	9	1			9	1			9	1			9	1	
TITUSVILLE	7	2	9	1			9	1			9	1			9	1	
WINDERMERE	5	2	7	1			7	1			7	1			7	1	
WINTERGRDN	8	3	11	2			11	2			11	2	11	2			
WINTERPARK	89 23	37	126	34	126	34					126	34	126	34			
WKISSIMMEE	10	3	13	2			13	2			13	2			13	2	
ORANCECITY	10																
TOTAL CODES	536 133	222	748	195	410	121	338	74	284	87	464	108	510	141	238	54	

Page 3 of 6
page 34

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

				Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split							
				Area "A" = Orlando & Winter Park Rt Ctr				Area "A" = Orlando Rate Center				Area "A" = Orange & Seminole Counties less Reedy Creek and Windermere Rate Centers							
				Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"					
				Forecasted Growth															
CO Codes in Service	Wireless	2Q98		1.25 year		Total		1.25 year		Total		1.25 year		Total		1.25 year			
		At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth		
		3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	
Existing 407 NPA																			
TOTAL CODES	526	222	748	195	410	121	338	74	284	87	464	108	510	141	238	54			
					a	b	a	b	a	b	a	b	a	b	a	b			
Area Code Life Under Assumption #1																			
c Number of area codes serving the territory				1		1		1		1		1		1		1			
d Number of assignable codes in an NPA(s) (748*c)				748		748		748		748		748		748		748			
e Number of working codes at exhaust (a)				410		338		284		464		284		510		238			
f Number of available codes for assignment (d - e)				338		410		464		284		284		238		510			
g Average forecasted code growth per year 4Q1999-2000 (h/1.25)				97		59		70		86		113		43					
h Area code life in years (f/g)				3.5		6.9		6.7		3.3		2.1		11.8					
Exhaust year				2003		2007		2006		2003		2002		2012					
Area Code Life Under Assumption #2																			
i Number of available codes for assignment (f)				338		410		464		284		238		510					
j Total forecasted code growth 4Q1999-2000(h)				121		74		87		108		141		54					
k Number of available codes for assignment beyond 2000 (i-j)				217		336		377		176		97		456					
l Forecasted code growth per year beyond 2000 (g/2)				48		30		35		43		56		22					
m Code life in years (k/l)+1.25 years				5.7		12.6		12.1		5.3		3.0		22.4					
Exhaust year				2005		2012		2012		2005		2003		2022					
Assumption #1: Code growth continues at 4Q1999-2000 levels																			
Assumption #2: Code growth reduced by 50% beyond 2000																			

Page 4 of 6 page 35

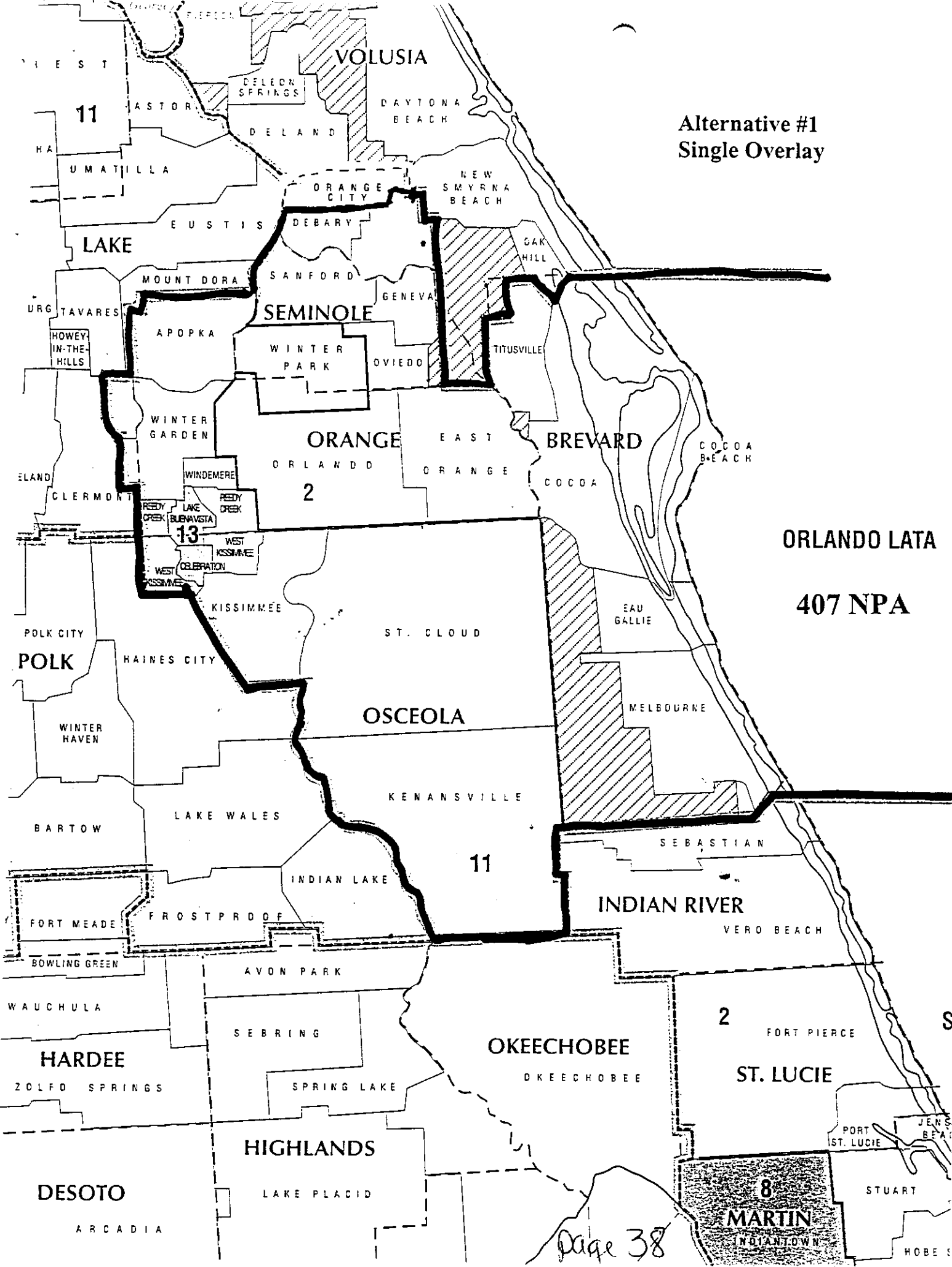
INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

					Alternative #8		Alternative #9 - Single Split				Alternative #10 - Single Split							
					Single Overlay		Area "A" = Part of Orange & Seminole				Area "A" = Orlando & E. Orange Rate C							
					plus		(Area "A" = Alternative #4 + Winter Park)											
					Orange City													
					Boundary													
					Realignment													
					407 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"					
					Forecasted Growth													
					Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year				
CO Codes in Service					At	Growth	At	Growth	At	Growth	At	Growth	At	Growth				
Wireless					3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00			
Existing 407 NPA																		
TOTAL CODES					526	222	748	195	758	196	502	140	246	55	290	88	458	107
					a	b	a	b	a	b	a	b	a	b				
Area Code Life Under Assumption #1																		
c Number of area codes serving the territory							2		1		1		1					
d Number of assignable codes in an NPA(s) (748*c)							1496		748		748		748					
e Number of working codes at exhaust (a)							758		502		246		290					
f Number of available codes for assignment (d - e)							738		246		502		458					
g Average forecasted code growth per year 4Q1999-2000 (b/1.25)							157		112		44		70					
h Area code life in years (f/g)							4.7		2.2		11.4		6.5					
Exhaust year							2004		2002		2011		2006					
Area Code Life Under Assumption #2																		
i Number of available codes for assignment (f)							738		246		502		458					
j Total forecasted code growth 4Q1999-2000(b)							196		140		55		88					
k Number of available codes for assignment beyond 2000 (i-j)							542		106		447		370					
l Forecasted code growth per year beyond 2000 (g/2)							78		56		22		35					
m Code life in years (k/l)+1.25 years							8.2		3.1		21.6		11.8					
Exhaust year							2008		2003		2021		2012					
Assumption #1: Code growth continues at 4Q1999 -2000 levels																		
Assumption #2: Code growth reduced by 50% beyond 2000																		

Page 4 of 6

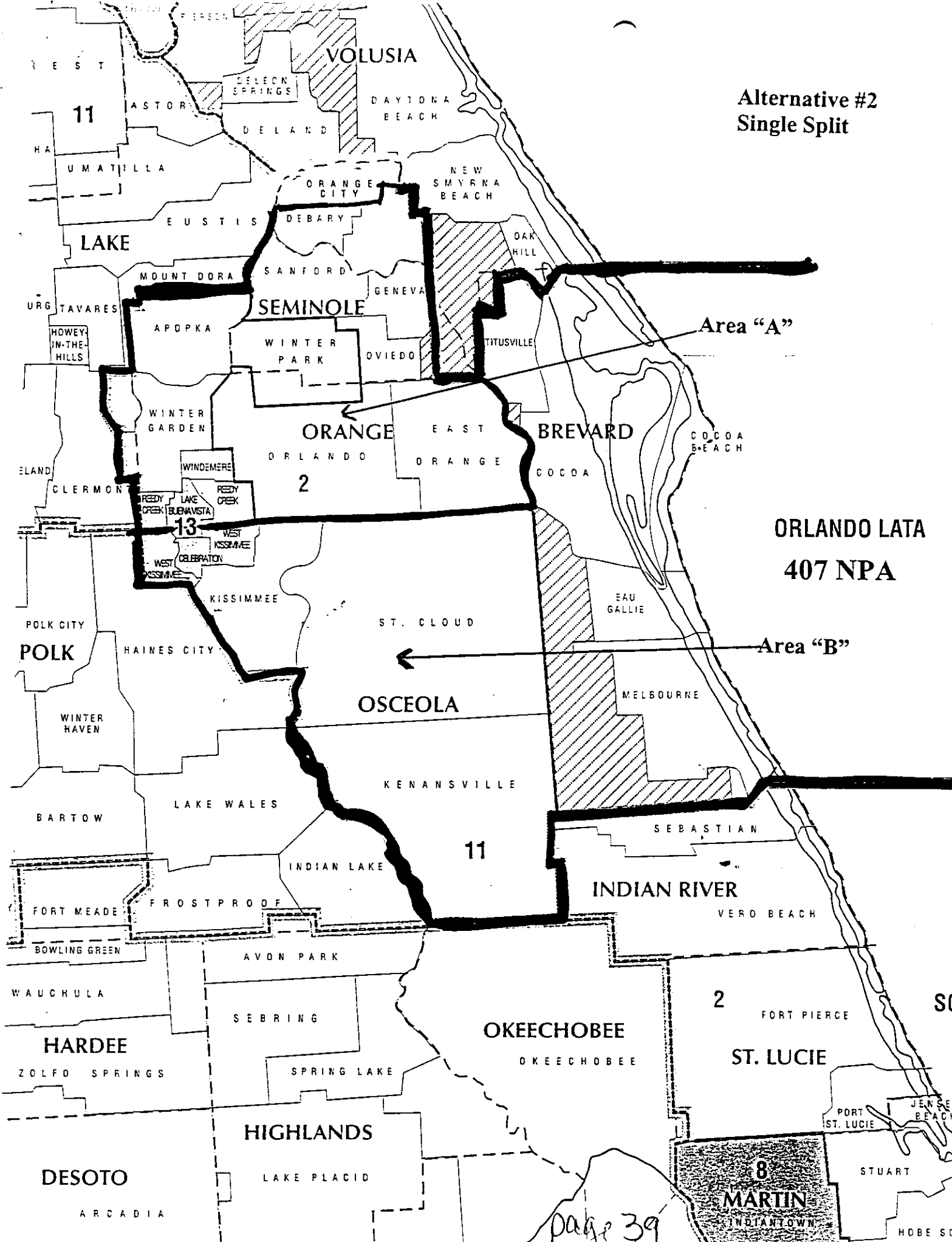
Page 37

**Alternative #1
Single Overlay**



**ORLANDO LATA
407 NPA**

Alternative #2
Single Split



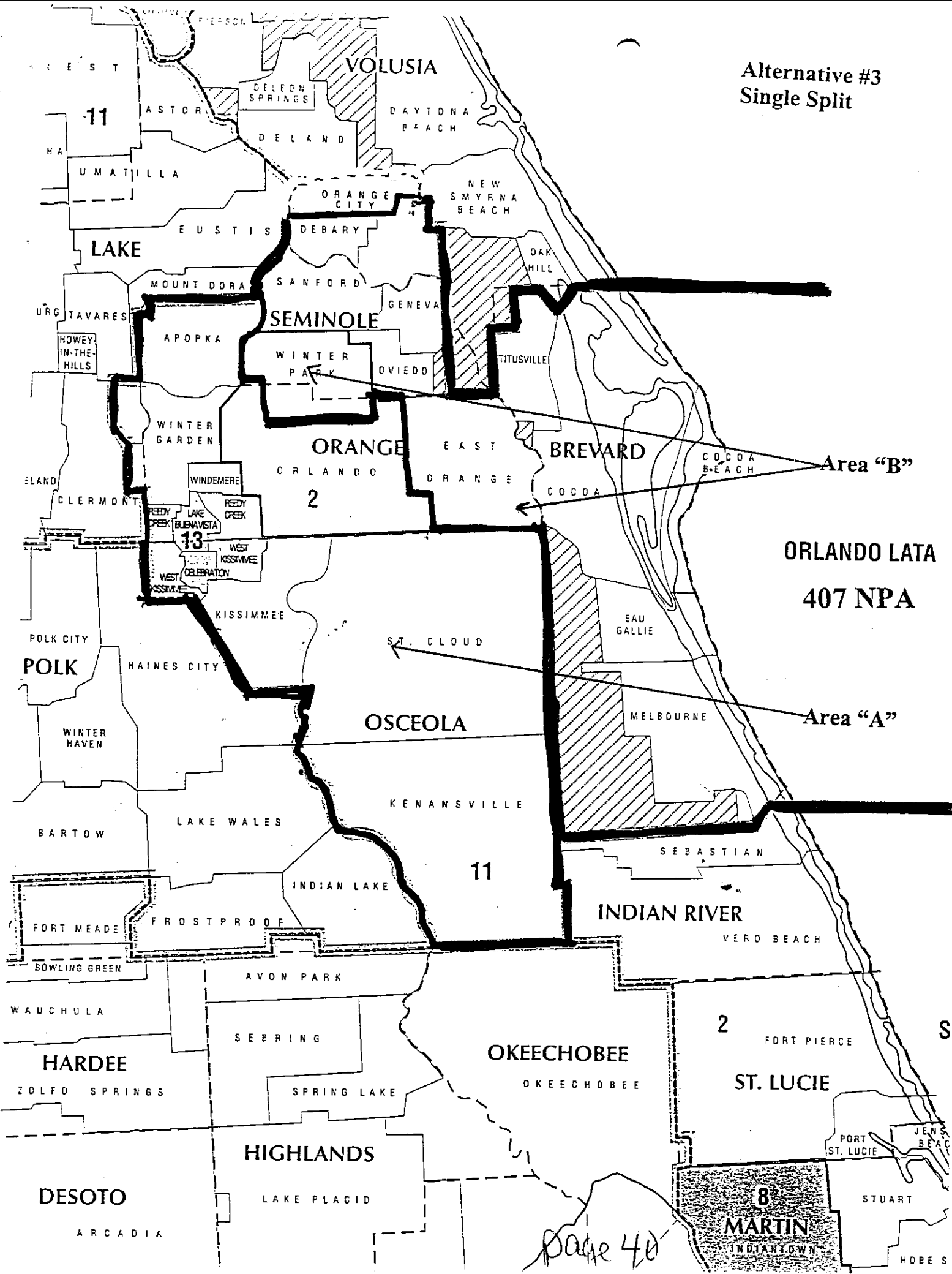
ORLANDO LATA
407 NPA

Area "A"

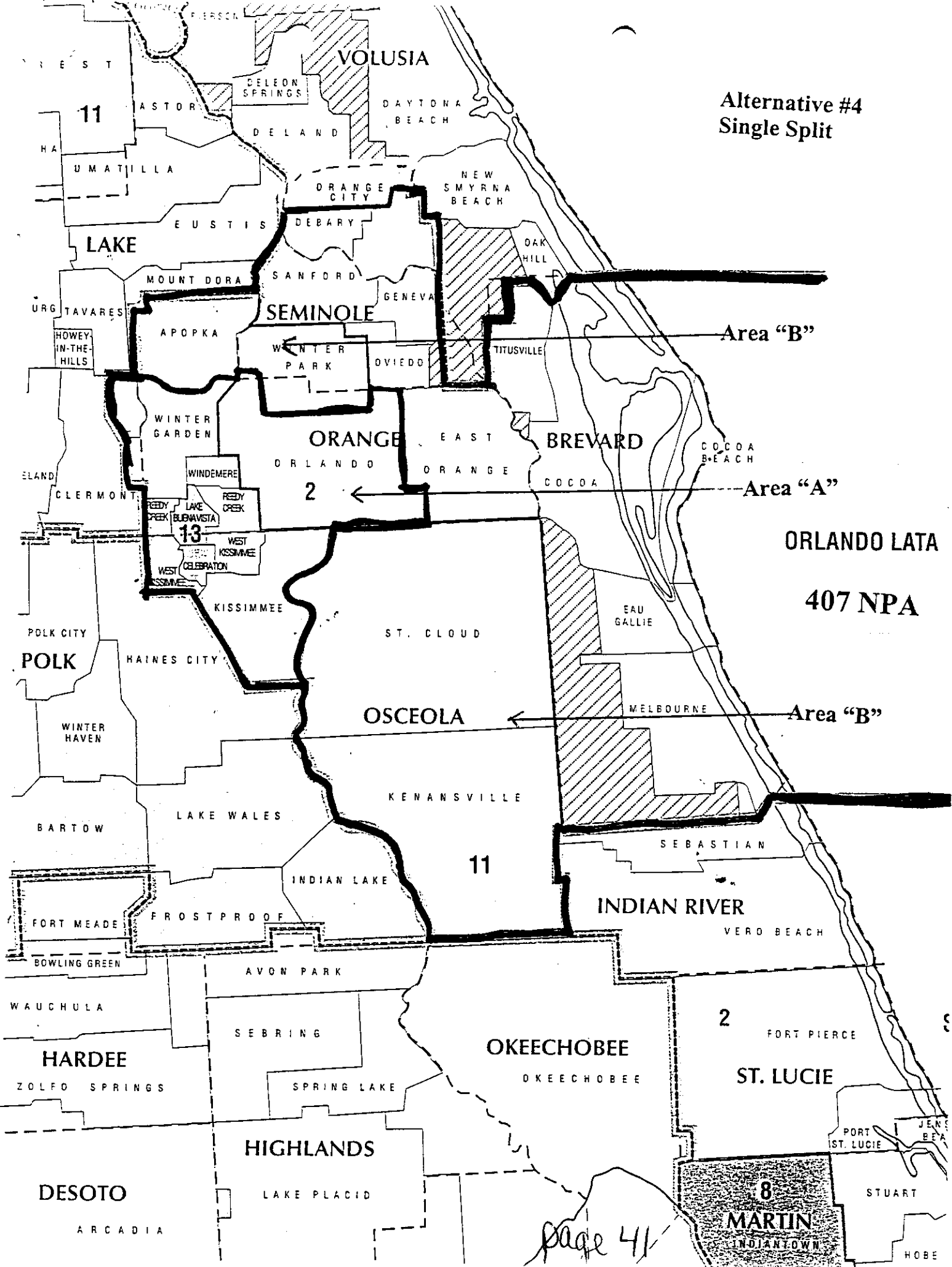
Area "B"

page 39

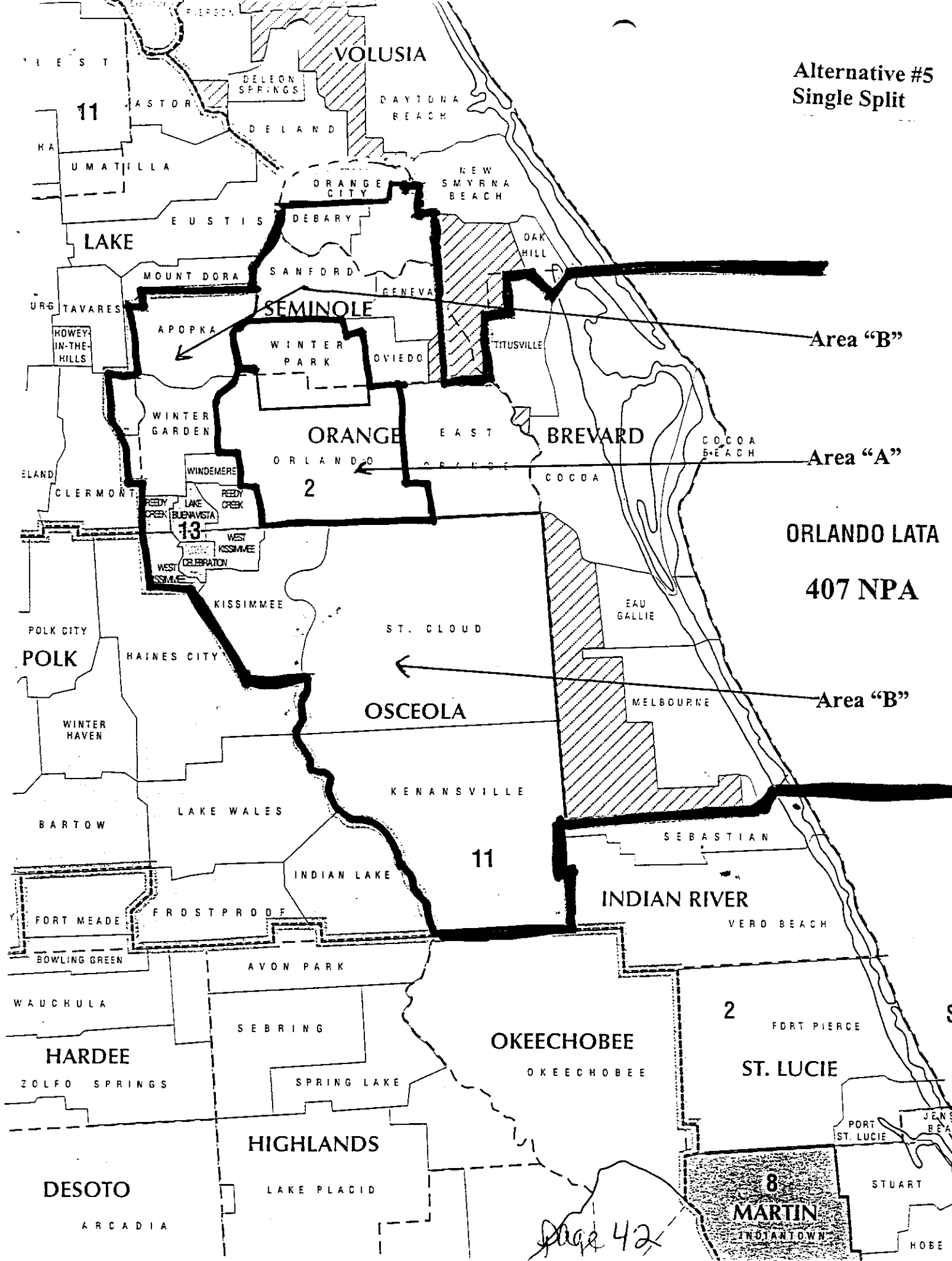
Alternative #3
Single Split



Alternative #4
Single Split



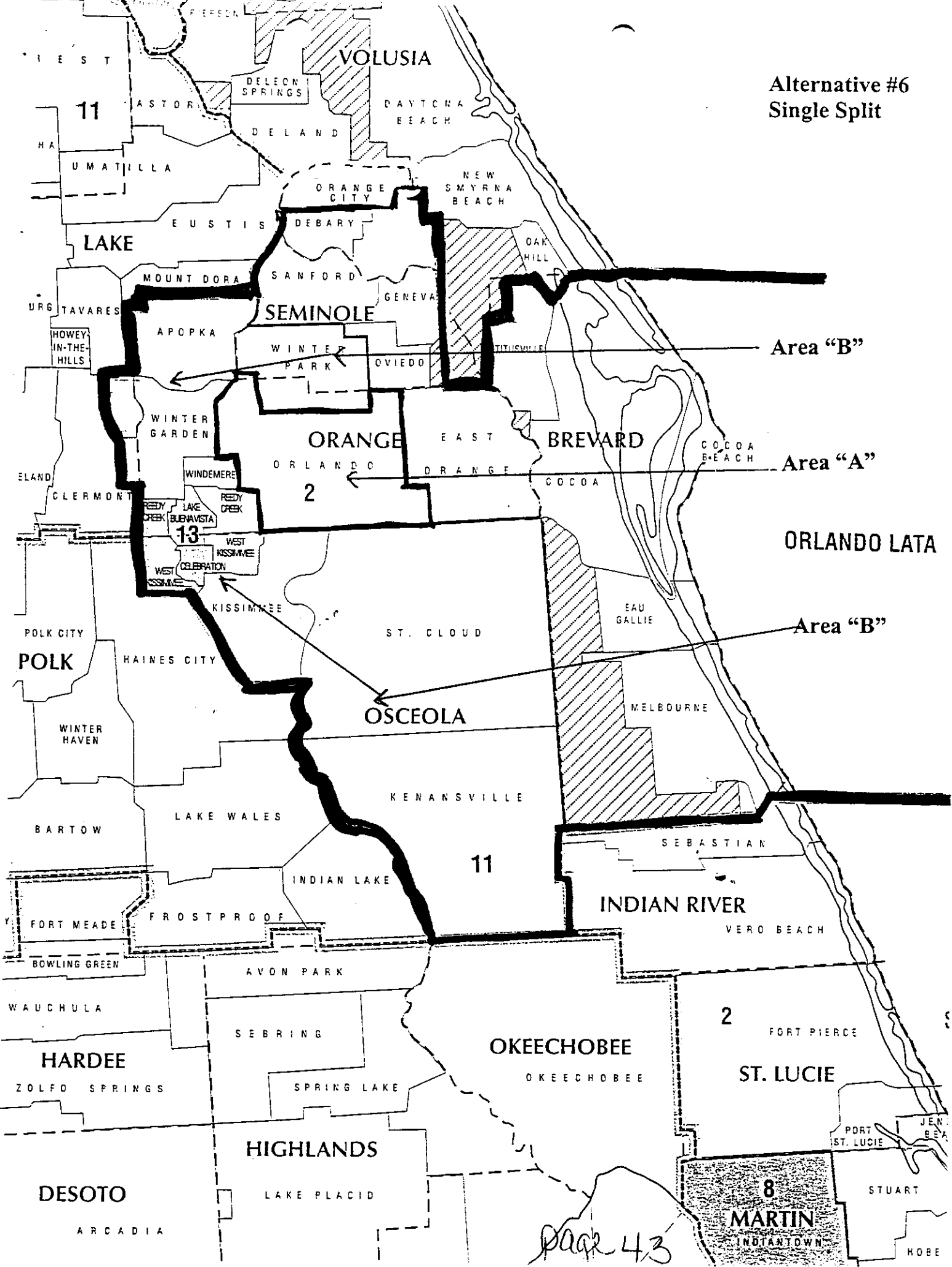
Alternative #5
Single Split



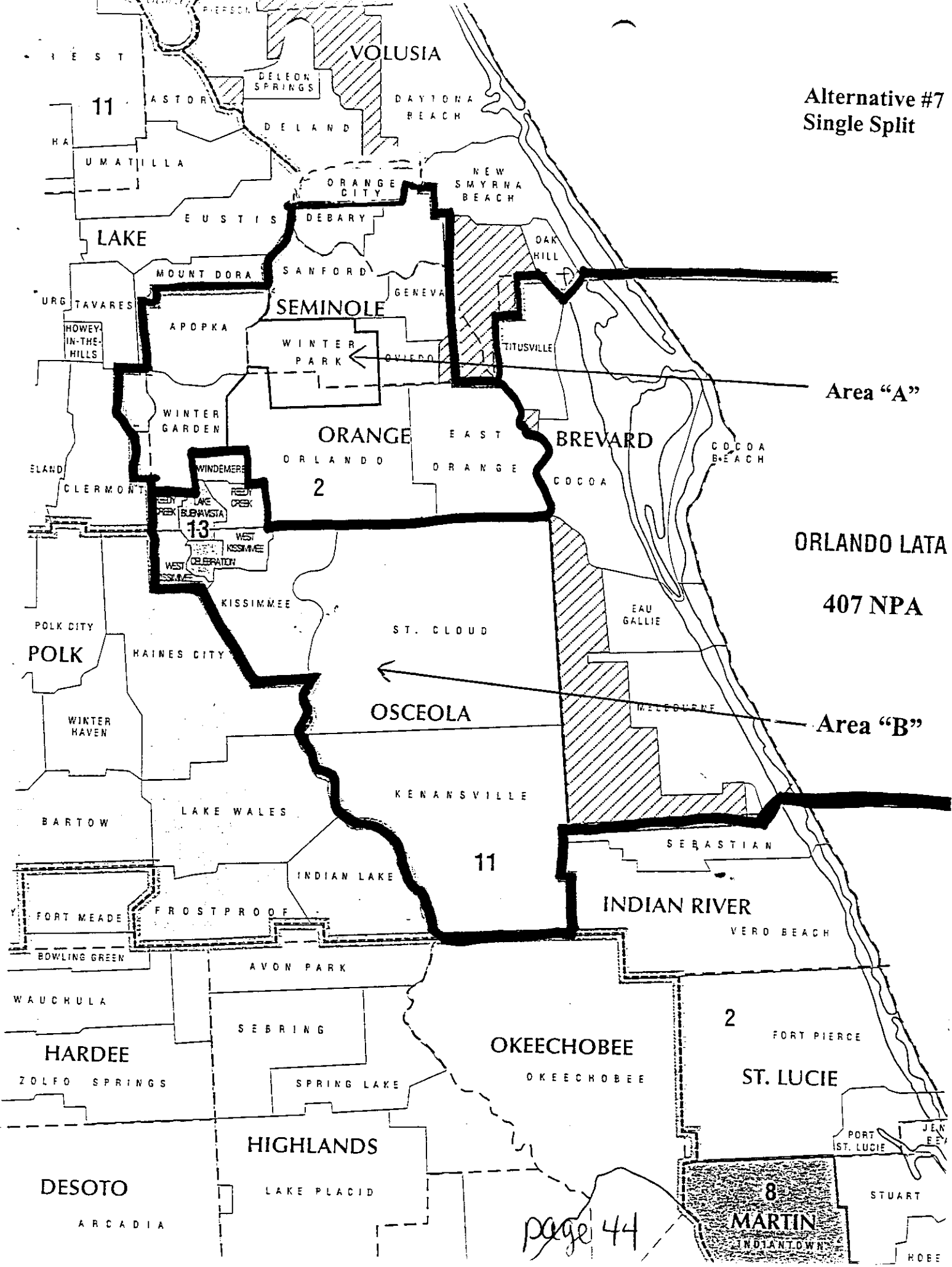
ORLANDO LATA
407 NPA

8
MARTIN
INDIANTOWN

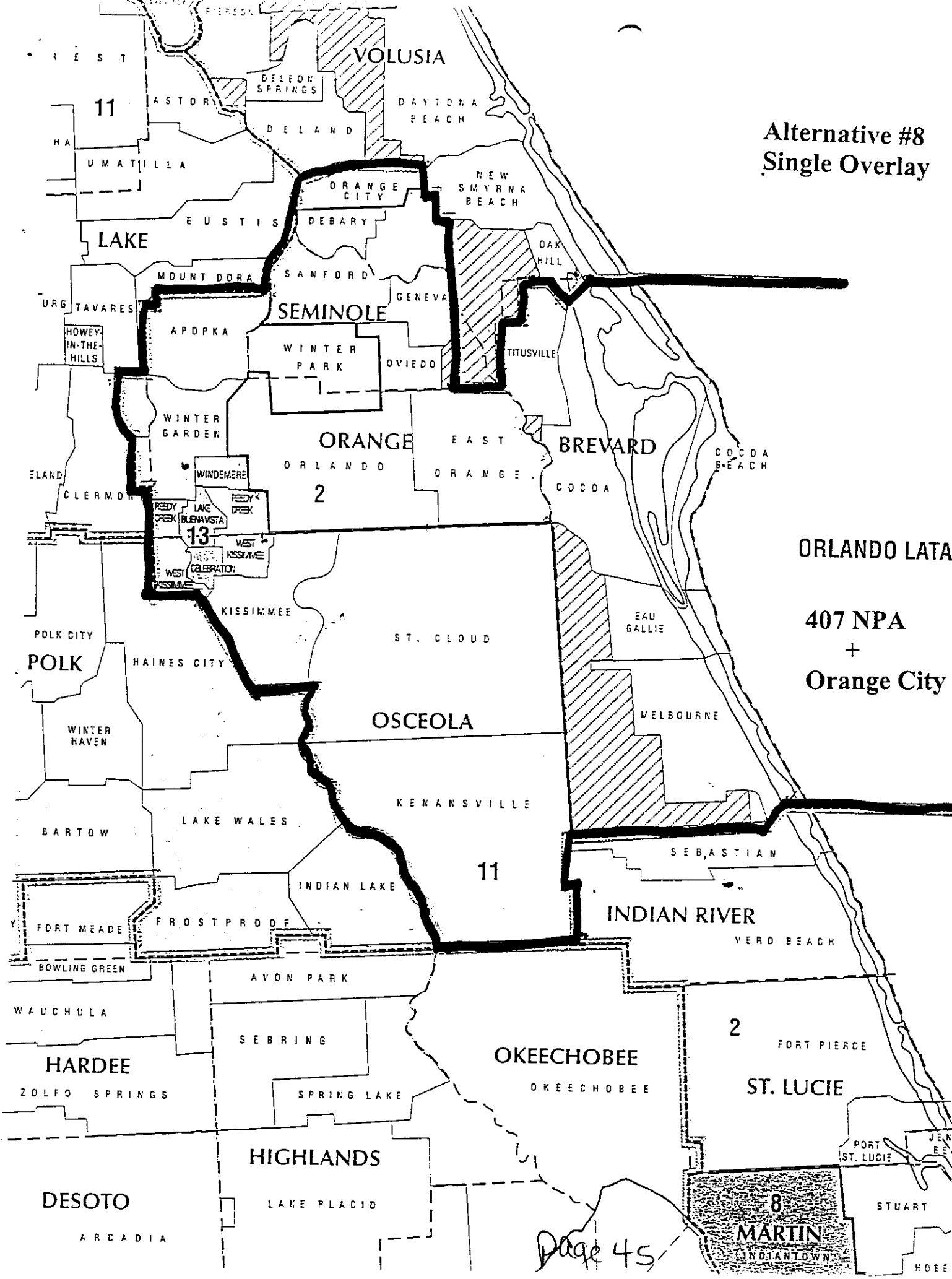
Alternative #6
Single Split



Alternative #7
Single Split

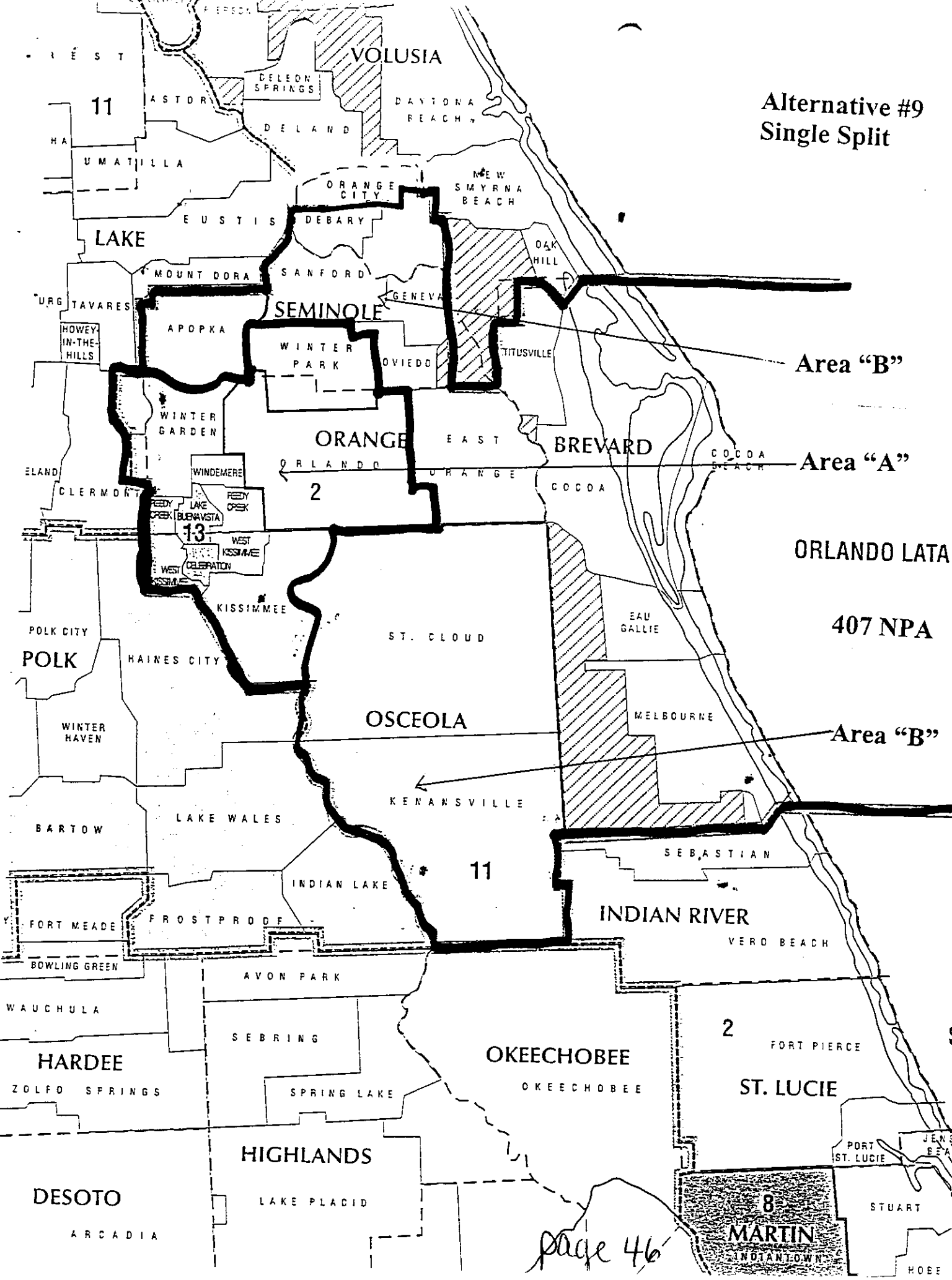


**Alternative #8
Single Overlay**



**ORLANDO LATA
407 NPA
+
Orange City**

Alternative #9
Single Split



Area "B"

Area "A"

ORLANDO LATA

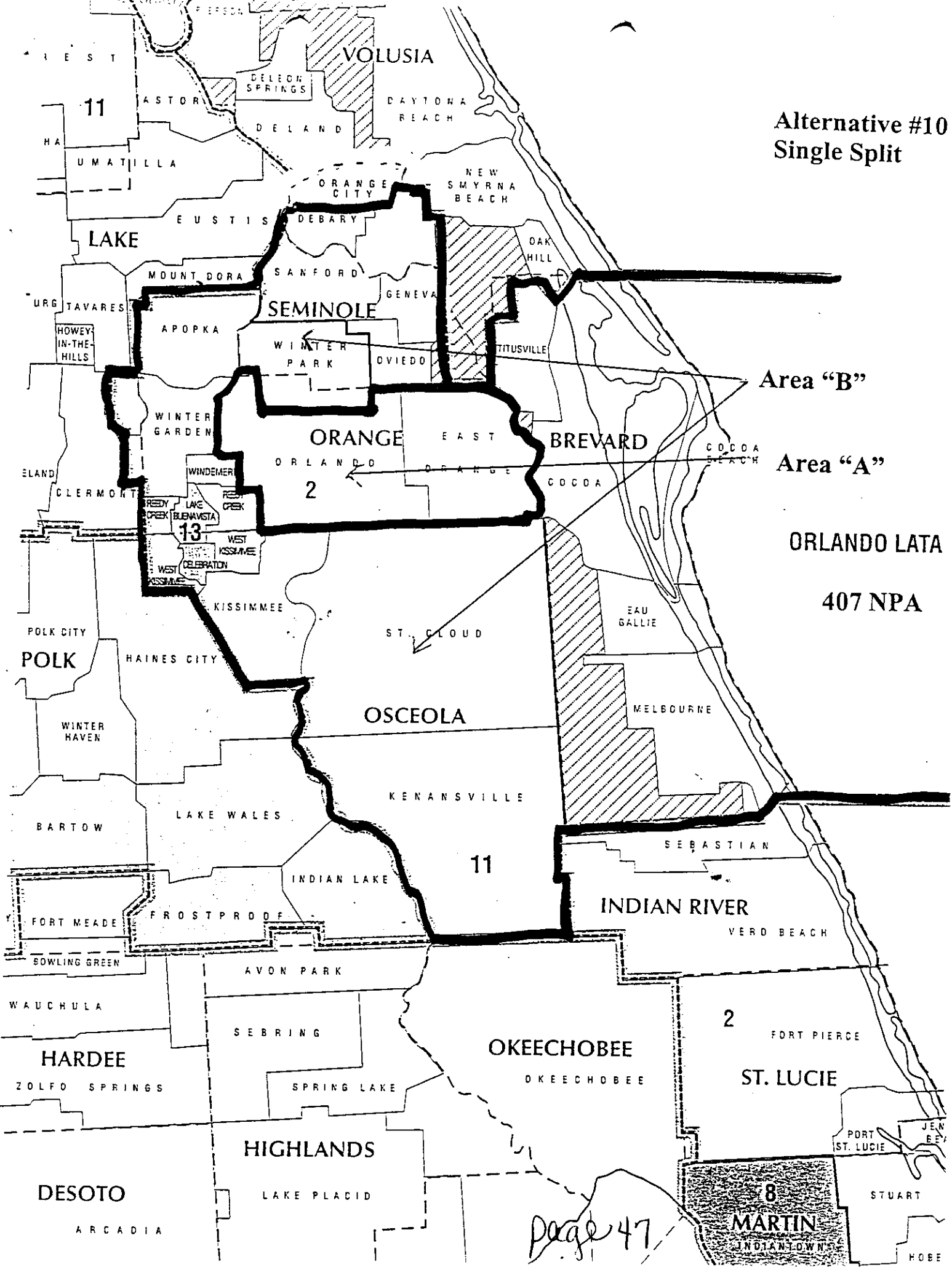
407 NPA

Area "B"

8

MARTIN
INDIAN TOWN

Alternative #10
Single Split



Area "B"

Area "A"

ORLANDO LATA
407 NPA

Alternative #1
Single Overlay

