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ATTORNEYS AT LAW

2000 PENNSYLVANIA AVENUE, NW  
WASHINGTON, D.C. 20006-1888  
TELEPHONE (202) 887-1500  
TELEFACSIMILE (202) 887-0763

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March 17, 1999

Writer's Direct Dial Number  
(202) 887-8750

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Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0863

Re: Docket No. 990223-TL  
Direct Testimony of Pamela Kenworthy  
on Behalf of Lockheed Martin IMS

Dear Director:

Pursuant to the March 3, 1999 Order Establishing Procedure issued by Commissioner Julia L. Johnson in the above-referenced docket, enclosed for filing are an original and 15 copies of the Direct Testimony of Pamela Kenworthy on Behalf of Lockheed Martin IMS. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Kimberly D. Wheeler  
Counsel for Lockheed Martin IMS  
North American Numbering Plan Administrator

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FPSC-BUREAU OF RECORDS

Enclosures

dc-152221

DOCUMENT NUMBER-DATE

03583 MAR 18 99

FPSC-RECORDS/REPORTING

STATE OF FLORIDA  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter, on the Commission's )  
Own Motion, to Request for Review )  
Of Proposed Numbering Plan Relief )  
For the 941 Area Code )

Docket No. 990223-TL

DIRECT TESTIMONY OF PAMELA KENWORTHY  
ON BEHALF OF  
LOCKHEED MARTIN IMS

March 18, 1999

DOCUMENT NUMBER-DATE

03583 MAR 18 99

FPSC-RECORDS/REPORTING

1 Direct Testimony of  
2 Pamela Kenworthy  
3 On Behalf of Lockheed Martin IMS  
4

5 **QUALIFICATIONS**

6 Q1. Please state your name and business address.

7 A1. My name is Pamela Kenworthy. My business address is 1133 15<sup>th</sup> Street, N.W.  
8 Washington D.C. 20005.  
9

10 Q2. With whom are you employed and in what capacity?

11 A2. I am employed at Lockheed Martin IMS as Numbering Plan Area (“NPA”) Relief  
12 Planner for the Eastern Region of the North American Numbering Plan. Lockheed  
13 Martin IMS performs the role of the neutral third party administrator of the North  
14 American Numbering Plan Administration (“NANPA”). I am responsible for  
15 initiating NPA relief planning in areas within the US in sufficient time to prevent  
16 the exhaust of numbering resources. This assignment includes monitoring code  
17 utilization trends in order to project NPA exhaust, notifying the industry and  
18 appropriate regulatory bodies of the need for NPA relief planning, and conducting  
19 relief planning meetings with the telecommunications industry. My responsibilities  
20 also include preparing and forwarding industry recommended relief plans to the  
21 appropriate regulatory agency and providing notification of agency approved relief  
22 plans to the industry in accordance with the NPA Code Relief Planning and  
23 Notification Guidelines (INC 97-0404-016) (“Guidelines”). The Guidelines are  
24 attached hereto as Exhibit PK-1.  
25

1 Q3. Please describe your educational background and previous professional experience

2 A3. I graduated from Western Maryland College in 1982 with a Bachelor of Arts degree  
3 in Political Science and Spanish. I worked for Fidelity Investments as a Forecast  
4 and Call Volume Planner analyzing market trends. I have also worked for the  
5 National Exchange Carrier Association ("NECA") in New Jersey where I was an  
6 Associate Manager, forecasting demand for Switched Access using econometric  
7 technical call models. Following that assignment, I worked in NECA's Regulatory  
8 Department where I analyzed Federal Communications Commission dockets  
9 dealing with numbering and other telecommunications policies and drafted related  
10 comments on behalf of NECA's member companies. In 1994, I joined MFS  
11 Communications (which later became WorldCom) as a Senior Manager to develop  
12 numbering policy for regulatory filings and proceedings involving the use of the  
13 North American Numbering Plan and number portability before assuming my  
14 present position at Lockheed Martin IMS in May of 1998.

15

16 **PURPOSE OF TESTIMONY**

17 Q4. What is the purpose of your testimony?

18 A4. I offer this testimony pursuant to the Guidelines and to explain NANPA's role in  
19 the instant NPA relief proceeding. On July 8, 1998, NANPA hosted an industry  
20 meeting in Tampa, Florida for the purpose of presenting NPA relief alternatives to  
21 the industry and to ultimately allow industry members to come to consensus on a  
22 single relief plan to be presented to the Florida Public Service Commission. At the  
23 meeting, NANPA distributed the Initial Planning Document ("IPD"), which

1 described two relief alternatives for the 941 area code, and industry members were  
2 given an opportunity to propose and discuss additional relief plans. The industry  
3 did not propose additional alternatives. The industry came to a consensus to  
4 recommend Relief Alternative # 2, a geographic split, as the method for relief for  
5 the 941 area code. The meeting notes, including a copy of the IPD and a map  
6 illustrating Alternative #2, are attached hereto as part of Exhibit PK-2. As the  
7 neutral third party administrator, Lockheed Martin IMS has no independent view  
8 regarding the selected relief option.

9  
10 Q5. Please provide a brief background of the contents of the IPD and recommended  
11 relief alternative.

12 A5. Two alternatives were developed by NANPA and discussed during the July 8, 1998  
13 industry meeting. Alternative #1 was an all services overlay and Alternative #2 was  
14 a geographic split. The IPD provided a synopsis of the proposed plans, including  
15 local dialing arrangements, and described the geographic boundaries of both the old  
16 and the new NPAs under both alternatives. The IPD also included maps illustrating  
17 the two relief alternatives. The industry members eliminated Alternative #1  
18 because they concluded that the public would regard unfavorably the mandatory 10-  
19 digit local dialing. The industry members eventually reached consensus to  
20 recommend Alternative #2 because they concluded that the geography within the  
21 existing 941 area code boundaries is sufficiently large to support a split alternative.  
22 The industry also reached consensus to recommend to the Florida Public Service  
23 Commission that the northwest area of the geographic split retain the 941 NPA.

1           **NANPA's ROLE IN THE NPA RELIEF PROCESS**

2    Q6.     What was NANPA's specific role during the relief planning process?

3    A6.     In addition to preparing the IPD, NANPA facilitated the industry consensus process  
4           towards the recommendation of an alternative for relief to the Florida Public  
5           Service Commission. In accordance with the Guidelines, NANPA also compiled  
6           and filed documents with the Florida Public Service Commission on August 17,  
7           1998 that provided the status of the industry's efforts and a description of the plan  
8           recommended by the industry. The filed document, including attachments, is  
9           attached hereto as Exhibit PK-2.

10  
11           **RELIEF ALTERNATIVES**

12   Q7.     Please describe Alternative # 1.

13   A7.     Alternative # 1 proposes to overlay a new area code over the 941 geographic area  
14           and use the existing boundary lines. All existing customers would retain the 941  
15           area code. However, all customers within the 941 and the new overlay area code  
16           would be required to use 10-digit local dialing when calling telephone numbers  
17           located within the NPA boundaries. This alternative was rejected by the industry.  
18           A map depicting Alternative #1 is attached hereto as Exhibit PK-3.

19  
20   Q8.     Please describe Alternative # 2.

21   A8.     Alternative # 2, the alternative recommended by the industry, splits the existing 941  
22           NPA into two sectors: a northwest area ("Area A") and a southeast area ("Area B").

1           The industry recommended through consensus that Area A retain the 941 area code.

2           A map depicting Alternative #2 is attached hereto as Exhibit PK-4.

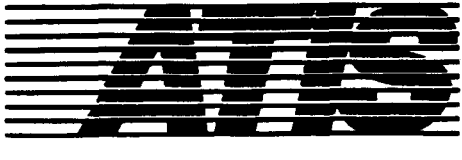
3

4    Q9.    Does this conclude your testimony?

5    A9.    Yes it does.

NPA Code Relief Planning & Notification Guidelines

INC 97-0404-016  
January 27, 1999



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Committee

A forum of the Carrier Liaison Committee

1200 G Street NW  
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# NPA CODE RELIEF PLANNING & NOTIFICATION GUIDELINES

These guidelines are reissued in connection with the resolution of  
INC Issue 105



## 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 code holders and the PA, where thousand block number pooling has been implemented, 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 Administrator's and Pool Administrator's Responsibilities for Code Relief Planning** - This section identifies required code relief planning functions that are related to the CO code (NXX) and thousand block pooling 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).

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

The Code Administrator(s) and the Pool Administrator where thousand block number pooling has been implemented shall be required to provide assistance in the code relief planning process when and if necessary. The output of the planning process shall be 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), with input from the Pool Administrator, to prepare the semi-annual CO Code Utilization Survey (COCUS) input as described in the CO Assignment Guidelines (INC 95-0407-008) and the Thousand Block (NXX-X) Pooling Administration Guidelines *[Add Document Number when assigned]* 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. The Pool Administrator may issue requests for thousand block data.

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, implementation of number pooling, 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.<sup>3</sup>

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.

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<sup>3</sup> Per letter dated 10/29/97 from NANC Chairman to INC Moderator.

**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.

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

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, 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 NANPA 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, with assistance from the Pool Administrator(s), when necessary, 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 the 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. The overall plan should also include a decision that determines the length of time (preferably 90 days to ensure accurate billing and prevent misdirected messages) before a central office code that has moved to the new NPA will be re-assigned in the old NPA once permissive dialing has ended. 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.

**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.

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\*\* 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.

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 NO/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.

**Pool Administrator** - Entity responsible for the administration of the NXX-X blocks within an NPA.

**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.

**Thousand Block (NXX-X) Number Pooling** - A number administration assignment process which allocates thousand blocks within the same NXX to a shared reservoir associated with a designated geographic area.

**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**

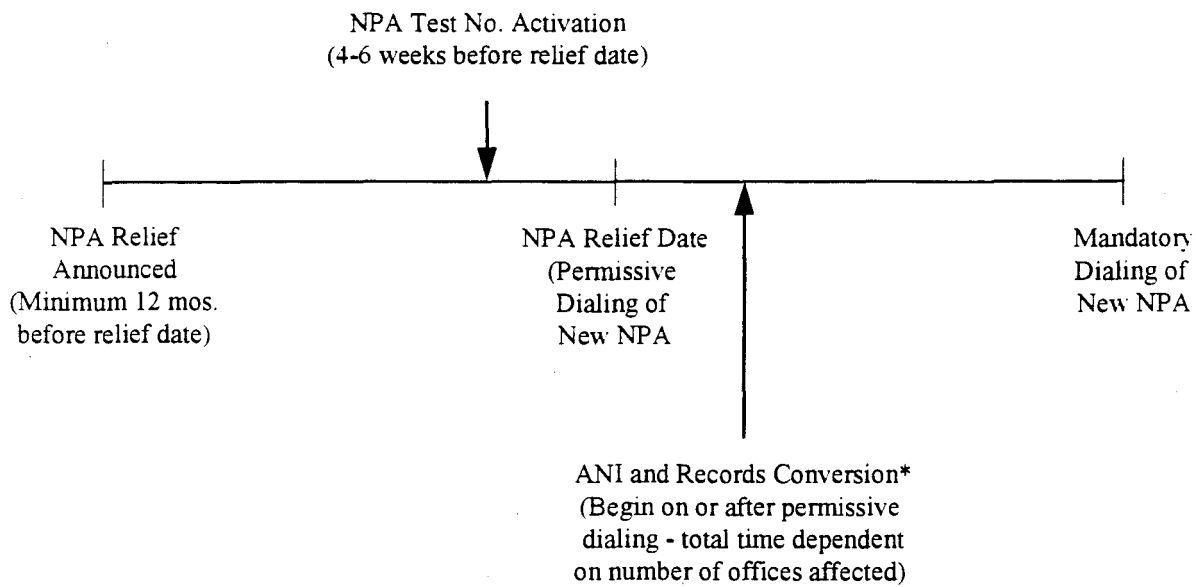
- hardware and software upgrades to switching systems
- modification to or replacement of some operating supporting systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- 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
- Number Pooling impact on length of relief period (where applicable)

Appendix C

# 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 202-756-6600, Facsimile 202-887-0331

LOCKHEED MARTIN 

August 14, 1998

Walter D'Haeseleer, Director  
Division of Communications  
State of Florida  
Public Service Commission  
Tallahassee, Florida

Dear Mr. D'Haeseleer:

On behalf of the telecommunications industry in Southwest Florida, Lockheed Martin submits the following recommendation for relief of Florida's 941 area code. As the neutral, third party administrator, Lockheed Martin IMS has no independent view regarding the selected relief option.

Based on current demand projections for Central Office (CO) codes, it is estimated that without any means of relief, Southwest Florida will exhaust the supply of CO codes in the 941 area 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 July 8, 1998 to discuss various relief alternatives. The industry reached consensus to recommend Alternative Relief Plan #2, a geographic split, as the method of relief for the 941 area code.

The attached documents provide background information, a status of industry's efforts, industry meeting notes and a description of the geographic split relief alternative recommended by the industry. The attached minutes of the July 8, 1998, industry meeting, also include a description of all of the relief alternatives considered by the industry.

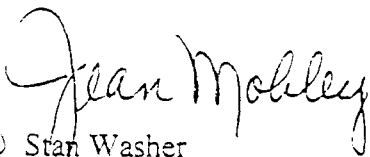
Furthermore, the industry reached consensus on the following implementation dates for the geographic split:

- Florida Public Service Commission approval announcement-11/1/98(±)/a.s.a.p.
- Permissive Dialing Begins – March 1999
- Permissive Dialing Ends/Mandatory Begins –September 1999
- Effective Date for New CO Code Assignments- October 1999

This schedule will ensure sufficient time for service providers to modify their networks and to educate all telecommunications customers who live in, work in, and call into the 941 area code prior to the introduction of the geographic split and the new area code.

We have been asked by the industry to submit the results of its efforts and to request approval of its recommendation no later than November 1, 1998, in order to effect a smooth transition and guarantee an uninterrupted supply of numbers.

Sincerely,



*for* Stan Washer  
Senior NPA Relief Planner – Central Region

Copy: 941 NPA Code Holders & Other Industry Members  
MaryRose Sirianni

Attachments



# FLORIDA 941 NPA RELIEF PLAN

Prepared by:

Stan Washer

Senior NPA Relief Planner

North American Numbering Plan Administration

Ronald R. Conners, Director

James N. Deak, Regional Director – NPA Relief Planning

August 14, 1998

## 941 NPA Exhaust Recommended Relief Plan

### Deployment Plan

#### A. BACKGROUND

Florida, like the rest of the nation, continues to experience tremendous demand for telephone numbers. Continued business growth and an increase in competition and new telecommunication technologies have offset the increase in available codes due to conservation measures and the previous code relief on the Gulf Coast. As a result, the exhaust of the 941 area code is now expected to be in the fourth quarter of 1999. This impending exhaust has advanced 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 may be accessed from the ATIS web site, [www.atis.org/atis/clc/inc/incdocs/htm](http://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 in the area code relief process and describe the alternative relief methods and their associated attributes. The guidelines 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

On June 16, 1998, in accordance with the guidelines, the NPA Relief Planner sent a letter to code holders and other industry members advising them of the impending exhaust of the 941 area code and the schedule for the upcoming Relief Planning Meeting in Tampa, Florida.

NANPA hosted the industry meeting in Tampa on July 8, 1998. Various industry segments were represented at the meeting. At the beginning of the meeting Stan Washer gave an overview of the NANPA transition schedule, the definition of consensus, and pertinent sections of industry relief planning guidelines. An Initial Planning Document (IPD) was distributed for consideration by the industry that included maps of two illustrative relief alternatives, including an all services overlay and one geographic split.

Mr. Washer led a review of the Initial Planning Document and industry input was solicited for additional alternatives. The industry proposed no additional alternatives. The relief alternatives are described below in Section C.

It was the consensus of the industry to eliminate Alternative #1, the all services overlay, due to the following issues: sufficient geography available to support a split alternative, the public perception of mandatory 10-digit local dialing, and keeping the public's interest in mind.

The industry also reached consensus, because of the perceived rates of growth and relative sizes of the areas, that the area north of the proposed split boundary, which includes Bradenton, Lakeland, Sarasota and Winter Haven, should keep the 941 area code.

### **C. DESCRIPTION OF ALTERNATIVES FOR CONSIDERATION**

Alternative #1 calls for a new area code to be added to (overlay) the geographic area served by the current 941 area code. All existing customers would retain the 941 area code and no numbers would have to change. As telephone numbers in the existing 941 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.

Alternative #2 proposes that the existing 941 area code be split into North – South sectors bounded by Northwest/Southeast LATA lines and company boundaries.

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit local dialing would be acceptable.

### **D. RECOMMENDED PLAN**

All of the Alternatives were discussed in an open forum by the represented industry attendees. Consensus was reached by the industry participants on the best plan for providing relief for the 941 NPA exhaust. This plan will be to split the existing 941 area code into two sectors, with the South sector acquiring a new area code. Assuming no significant change in the industry in the near term, subsequent exhaust of the new area code is thought to be in about 5.9 years. The new 941 would exhaust in about 5.2 years.

**941 Industry Relief Meeting  
Tampa, Florida  
July 8, 1998**

**WELCOME AND INTRODUCTIONS**

Stan Washer, Lockheed Martin Senior NPA Relief Planner, opened the meeting with introductions and objectives of the meeting. See Attachment #1 for the list of invitees to the meeting and those who attended. See Attachment #2 for the agenda of the meeting.

**NANPA TRANSITION UPDATE**

Mr. Washer 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. In June, 1998 the CO Code Administration function transferred from GTE to Lockheed Martin NANPA.

**REVIEW INDUSTRY GUIDELINES**

Mr. Washer reviewed various sections of the NPA Code Relief Planning and Notification Guidelines (INC97-0404-016 Issued 4/4/97). You may download this document from the ATIS web site ([www.atis.org/atis/clc/inc/incdocs.htm](http://www.atis.org/atis/clc/inc/incdocs.htm)).

**INITIAL PLANNING DOCUMENT**

The Initial Planning Document (IPD) was reviewed and discussed by the industry. The IPD, see attachment #3, included two alternatives: one geographic split and one all services overlay. The industry proposed no additional relief alternatives.

**ELIMINATION OF ALTERNATIVES**

It was the consensus of the industry to eliminate Alternative #1 the all services overlay due to the following issues: sufficient geography to support a split alternative, the public perception of mandatory 10-digit local dialing, and keeping the public's interest in mind.

**RECOMMENDED RELIEF ALTERNATIVE**

All of the alternatives were discussed extensively along with their attributes. The industry came to a consensus on Alternative #2. This geographic split alternative follows Northwest/Southeast LATA lines and company boundaries. Industry also reached consensus to keep the 941 NPA in the northern area of the geographic split due to the higher perceived rate of growth and relative size of the areas. Attachment #4 contains a list of codes and rate centers in the two area codes.

**SUBMISSION TO THE FLORIDA PUBLIC SERVICE COMMISSION**

It was the consensus of the industry that Lockheed Martin should forward the results of the 941 NPA relief meeting to the Florida Public Service Commission. Lockheed Martin will advise the Commission that the industry reached consensus to recommend Alternative #2, a geographic split, to provide relief for the 941 NPA.

### **IMPLEMENTATION INTERVALS**

The industry reached consensus on the following implementation dates:

- Florida Public Service Commission approval announcement-11/1/98(±)/a.s.a.p.
- Permissive Dialing Begins – March 1999
- Permissive Dialing Ends/Mandatory Begins –September 1999
- Effective Date for New CO Code Assignments - October 1999

### **APPROVAL OF MINUTES**

A conference call is scheduled to review the minutes of the 941 NPA Relief Meeting and a draft of the PSC filing on Monday, August 10, 1998 at 2:00 PM EDT. The bridge number is, (805) 240-9653, access code, 827619.

Init	Last Name	First Name	Company	Phone	Fax
	Hopson	Pat	360° Communications	773-399-2419	773-399-7201
	Rogers	Ken	360° Communications	773-399-5381	773-399-2536
	Go	Richard	360° Communications	773-399-2333	773-399-7201
	Reichenberger	Tom	Aerial Communications	813-243-3205	813-243-1906
X	Martin	Michael	Aerial Communications, Inc.	813-453-8840	813-243-1906
	Holt	Lew	Aerial Communications, Inc.	813-243-3224	813-243-1906
	McCartney	Joe	AGR/Pronet Paging Inc.	813-572-6646	813-573-7844
	Jordan	Paula	AirTouch Communications	510-279-6033	510-279-6621
	Bolich	Mark	AirTouch Paging	813-572-742	813-573-0329
	Logering	Dennis	American Paging	813-288-9497	813-289-3966
	Frediund	Andy	Arch Communications	561-912-7410	561-912-7450
	Gadbois	Steve	Arch Communications	704-341-5131	704-544-0103
	Reinhart	Roger A.	AT & T Wireless Services	201-986-7306	201-291-8108
	McGee	Thomas	AT&T	770-785-5872	770-602-2455
	McGee	Debbie	AT&T Local	908-771-4237	908-771-8268
	Gianella	John	AT&T Wireless	561-775-4444	561-775-4253
	Meins	Charlene	AT&T Wireless	425-803-1232	425-828-8609
	Cahall	Richard	AT&T Wireless Services	561-432-6468	561-432-6555
	Sullivan	Joseph	AT&T Wireless Services	713-871-3812	713-871-3846
	Mangelo	Rich	ATT Local	908-771-2690	908-771-8268
	Haferi	Robert	Bell Atlantic Mobile	908-256-7165	908-256-7010
	Hoskins	Anne	Bell Atlantic Mobile	973-622-4444	973-624-7070
X	Merriman	Rebecca	BellSouth	813-417-1092	813-930-6319
	Burleson	Ron	BellSouth Cellular	404-249-0455	404-249-0453
	Jardon	Mario	BellSouth Mobility	561-995-3583	561-995-3567
	McCullough	Doug	BellSouth Telecommunications	205-977-5069	205-977-7877
	Merrill	J.B.	BTI	919-510-7270	919-510-7239
X	Welbaum	Deana	City of Lakeland	941-499-6803	941-499-8821
	Cummings	Harry	City of Lakeland	941-499-8760	941-499-8761
	Edwards	Donald	Comcast Cablevision	610-538-3003	610-538-3016
	Robertson	Marzie	Conxus	864-241-5453	864-241-5483
	Plott	David	CONXUS Network, Inc.	864-239-5311	864-241-8197
	Taylor	Greg	Digiph	770-446-5020	770-446-5035
	Jobe	Jack	Dynatel Paging	904-730-6000	904-730-2012
	Jordan	Barbara	Espire Communications	301-361-7623	301-361-7667
X	Sirianni	Maryrose	Florida PSC	850-413-6564	850-413-6565
	Wickham	Jennifer	Goetek Communications, Inc.	201-930-5187	201-930-0287
X	Gancarz	Skip	GTE	813-483-2033	813-228-8733
X	Harshbarger	A. L.	GTE	813-483-2541	813-204-8862
X	Adair	Grady	GTE - Florida	813-483-2529	813-223-4888
X	Tapia	Larry	GTE Florida	813-483-2188	813-221-8103
X	Sadler	Harry	GTE Florida	813-483-2005	813-228-8733
X	Hancock	Hershel	GTE Mobilnet of Tampa, Inc.	813-282-6417	813-620-4124
X	Watkins	Daryl	GTE Wireless	813-282-6431	813-620-4124
	Vandyke	Robert	Intermedia Communications of Florid	813-829-2498	813-829-2281
	Roberts	Sherita	LDDS WorldCom	918-590-8529	918-590-5598
	Faul	Kelly	MCI	703-918-0457	703-918-6814
	Williams	Frederick	MCI Long Distance	972-918-1816	972-918-1821
	Harvey	Karen	MCI Metro	703-918-6648	703-918-6652
	Reaves	Terri	MCI Metro Access Services.	703-918-6152	703-918-6617
	Gonzalez	Izzy	MediaOne	904-619-3323	904-619-3355
	Day	Steven	Metrocall	703-660-6677	703-765-4385
	Wooten	Kristy	Mobil Comm	601-977-1575	601-977-1748
	Mansour	Mark A.	National Telecommunications	954-491-9300	954-491-1832
	Williams	Terry	Nextel	407-948-2145	407-667-1240
	Salpietra	Carl	Nextel	407-948-2142	407-667-1240

Init	Last Name	First Name	Company	Phone	Fax
	Tirador	Judy	Omnipoint Communications	973-290-2411	973-290-2445
	Charity	Ariene	PageMart	214-706-8209	214-750-9201
	Wiginton	Bill	Pagenet	972-985-5162	972-985-4081
	Stedie	Mazen	Pager One of Florida, Inc.	561-687-8400	561-687-1235
	Rosario	Reggie	Paging Network of Tampa	813-873-8400	813-876-3710
	Van Allen	Eric	Palmer Cellular		912-650-7321
	Sanders	John F.	Preferred Networks	770-416-5931	770-734-0936
	Pierre	Janet	Primeco PC	407-786-2017	407-916-0084
	Azif	Jeremy	PrimeCo Personal Communications	817-258-1241	817-258-1202
	Webster	Angela	Sprint	913-624-6016	913-624-5504
X	Craven	Brian	Sprint	407-889-6807	407-884-0206
X	Taulbee	Kathy	Sprint		407-884-1919
X	Foley	Tom	Sprint	407-889-6168	407-884-1919
X	Green	Barbara	Sprint	407-830-3245	407-332-9365
	Kimmell	Beth	Sprint	816-559-5023	816-559-5093
	Key	Tony	Sprint Communications	404-649-5144	404-649-5174
	Figlioli	Vito	Sprint PCS	813-639-2023	813-639-2050
	Krug	John F.	Teleport Comm.	718-355-2762	718-355-4804
	Rutledge	Tene	Teligent Inc.	703-762-5532	703-288-5643
	Newkirk	Teresa	Time Warner Telecom	303-705-4663	303-705-1874
	Hunter	Dena	Time Warner Telecom	303-705-1818	303-705-1874
	Twombly	Dana	Utilities, Inc.	207-642-7208	207-642-3095
	Lukowski	Ray	Winstar Telecommunications, Inc.	703-645-5466	703-645-5395

**941 AREA CODE RELIEF  
INDUSTRY MEETING  
JULY 8, 1998**

**GTE (Tampa City Center)  
201 North Franklin Street  
3<sup>rd</sup> Floor, Polk Room  
Tampa, Florida**

**AGENDA**

8:30 AM	Coffee and Registration
9:00 AM	Welcome and Introductions
9:10 AM	NANPA Transition Update
9:15 AM	ATIS/Industry Consensus Definition
9:20 AM	Industry Relief Planing Guidelines
9:30 AM	Review of Initial Planning Document
10:15 PM	Additional Alternatives from Industry
10:45 AM	Discuss Alternatives
12:00 Noon	Lunch (on your own)
1:00 PM	Discuss Alternatives (cont.)
1:50 PM	Develop Consensus on Relief Alternative
2:50 PM	Develop Consensus on Dialing Plan
3:45 PM	Establish Implementation Schedule
4:00 PM	Discuss Media Interface
4:10 PM	Review Action Items
4:20 PM	Schedule Call to Review Minutes
4:25 PM	Complete NANPA Survey
4:30 PM	Adjourn



**Initial Planning Document**  
**For Relief of Florida's 941 NPA**

Prepared by:

Stan Washer

Senior NPA Relief Planner

North American Numbering Plan Administration

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

July 7, 1998

## 941 NPA Relief Alternatives

### Overlay Alternative

A new NPA code would be assigned to the same area covered by the current 941 NPA. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPA will be assigned upon request after the effective date of the new area code. At exhaust of the 941 NPA all code assignments will be in the overlay area code.

### Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit local dialing would be acceptable.

#### (1) Northwest - Southeast Split

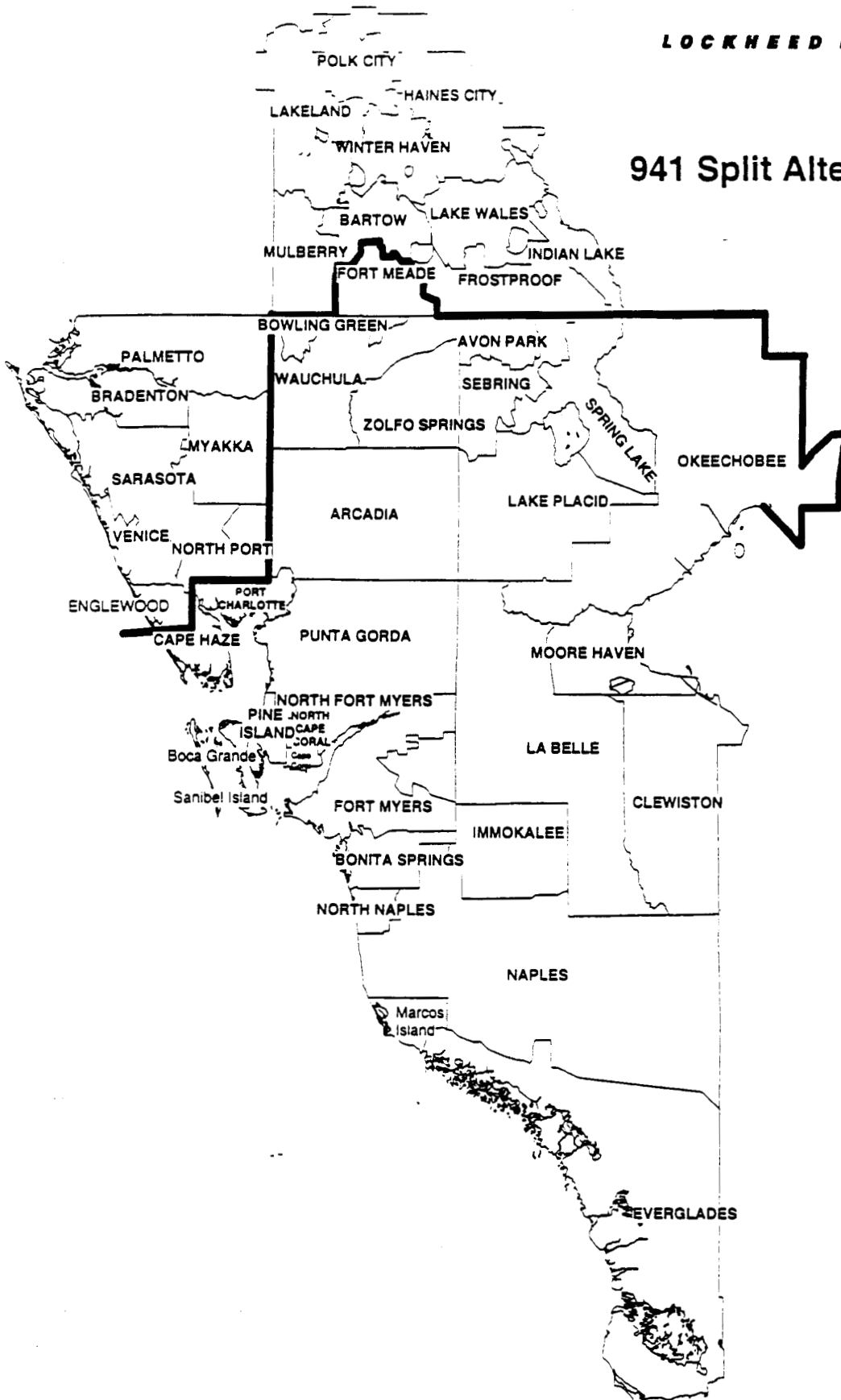
Split the existing 941 NPA into Northwest – Southeast Sectors so that Polk, Manatee and Sarasota Counties are in the Northwest area code. The Southeast area code would include the following counties: Charlotte, Collier, DeSoto, Glades, Hardee, Henry, Lee, and Okeechobee. Also included in the Southeast area code would be the Fort Meade exchange in Polk County. Some of the larger exchanges follow:

<i>Northwest NPA</i> (298 NXXs) (5.2 yrs.)	Bartow Bradenton Haines City	Lake Wales Lakeland Palmetto	Sarasota Venice Winter Haven
<i>Southeast NPA</i> (273 NXXs) (5.9 yrs.)	Arcadia Avon Park Bonita Springs Cape Coral	Fort Myers Naples North Naples No. Ft. Myers	Okeechobee Port Charlotte Sebring

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# 941 Split Alternative # 2



## 941 NPA List of Communities / NXX Codes

LATAs (952 and 45806)

<u>Locality</u>	<u>Code</u>
Bartow	344, 512, 519, 533, 534, 537, 602
Bradenton	301, 345, 545, 704, 705, 708, 713, 714, 715, 718, 720, 725, 727, 730, 736, 737, 739, 741, 742, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 755, 756, 758, 761, 778, 779, 792, 794, 795, 798, 856, 920
Englewood	265, 460, 473, 474, 475
Frost Proof	621, 635
Haines City	419, 420, 421, 422, 424, 427, 438, 439, 557, 622
Indian Lake	663, 692
Lake Wales	528, 605, 632, 638, 653, 664, 676, 678, 679, 696, 987
Lakeland	284, 327, 406, 413, 499, 559, 562, 563, 568, 570, 603, 606, 607, 608, 609, 614, 616, 617, 619, 640, 644, 646, 647, 648, 660, 665, 666, 667, 668, 669, 670, 680, 682, 683, 686, 687, 688, 701, 709, 712, 738, 802, 815, 816, 819, 834, 838, 853, 858, 859, 868, 944
Mulberry	425, 428, 863, 869
Myakka	322, 836
North Port	347, 423, 426, 429, 857
Palmetto	721, 722, 723, 729, 776, 817, 861
Polk City	862, 984
Sarasota	215, 228, 252, 296, 302, 306, 312, 313, 315, 316, 317, 319, 320, 321, 323, 328, 329, 330, 331, 333, 341, 342, 343, 346, 349, 350, 351, 355, 356, 358, 359, 360, 361, 362, 363, 364, 365, 366, 371, 372, 373, 374, 376, 377, 378, 379, 383, 387, 388, 487, 504, 506, 507, 544, 569, 650, 706, 724, 726, 762, 780, 905, 906, 907, 9112, 914, 915, 917, 921, 922, 923, 924, 925, 926, 927, 928, 929, 951, 952, 953, 954, 955, 957, 960, 961, 971, 972, 973, 974, 975, 977, 988
Venice	203, 408, 412, 416, 468, 480, 483, 484, 485, 486, 488, 492, 493, 496, 497, 820, 918, 966
Winter Haven	206, 207, 217, 224, 258, 259, 280, 287, 288, 289, 291, 292, 293, 294, 295, 297, 298, 299, 307, 318, 324, 325, 326, 367, 401, 501, 502, 521, 551, 604, 651, 956, 965, 967, 968

**(New) SW Florida NPA  
List of Communities / NXX Codes**

LATAs (93901 and 93902)

<u>Locality</u>	<u>Code</u>
Arcadia	444, 491, 494, 523, 990, 993
Avon Park	254, 443, 449, 452, 453, 527
Boca Grande	245, 759, 964
Bonita Springs	221, 273, 495, 498, 947, 948, 949, 992
Bowling Green	375
Cape Coral	223, 540, 541, 542, 549, 945
Cape Haze	225, 662, 697, 698
Clewiston	222, 599, 902, 983
Everglades	233, 695, 719
Fort Meade	285
Fort Myers	209, 218, 227, 246, 247, 251, 267, 274, 275, 277, 278, 279, 281, 332, 334, 335, 336, 337, 338, 339, 415, 418, 432, 433, 437, 442, 454, 459, 461, 466, 469, 470, 476, 477, 478, 479, 481, 482, 489, 490, 561, 565, 590, 633, 636, 671, 672, 690, 691, 603, 694, 707, 728, 754, 768, 770, 771, 841, 848, 849, 850, 851, 890, 910, 930, 931, 936, 939, 940, 980, 982, 989, 991, 994, 996, 998, 999
Fort Myers Beach	226, 463, 765
Immokalee	234, 657, 658, 842
La Belle	235, 673, 674, 675, 843
Lake Placid	441, 464, 465, 525, 699
Lehigh Acres	236, 303, 368, 369
Marco Island	237, 389, 393, 394, 642
Moore Haven	238, 946
Naples	231, 248, 249, 253, 261, 262, 263, 264, 269, 272, 348, 352, 353, 354, 403, 417, 430, 434, 435, 436, 455, 643, 649, 659, 732, 733, 774, 775, 793
No. Cape Coral	239, 458, 573, 574, 772
No. Naples	216, 232, 250, 290, 370, 431, 450, 451, 513, 514, 564, 566, 571, 572, 591, 592, 593, 594, 596, 597, 598, 641, 645, 717, 777, 860
No. Ft. Myers	240, 543, 567, 652, 656, 731, 995, 997
Okeechobee	357, 447, 462, 467, 610, 634, 763
Pine Island	241, 282, 283
Port Charlotte	204, 242, 255, 276, 286, 380, 456, 457, 522, 613, 620, 623, 624, 625, 626, 627, 628, 629, 661, 740, 743, 764, 766, 769
Punta Gorda	243, 505, 575, 637, 639
Sebring	202, 314, 381, 382, 384, 385, 386, 402, 414, 446, 471, 526
Sanibel-Captiva Is.	244, 395, 472
Spring Lake	655
Wauchula	445, 448, 524, 767, 773, 781
Zolfo Springs	735

**941 NPA  
NXX Codes  
In Numerical Sequence**

203	321	376	488	616	705	761	921
206	322	377	492	617	706	762	922
207	323	378	493	619	708	776	923
215	324	379	496	621	709	778	924
217	325	383	497	622	712	779	925
224	326	387	499	632	713	780	926
228	327	388	501	635	714	792	927
252	328	401	502	638	715	794	928
258	329	406	504	640	718	795	929
259	330	408	506	644	720	798	944
265	331	412	507	646	721	802	951
270	333	413	512	647	722	815	952
280	341	416	519	648	723	816	953
284	342	419	521	650	724	817	954
287	343	420	528	651	725	819	955
288	344	421	533	653	726	820	956
289	345	422	534	660	727	834	957
291	346	423	537	663	729	836	960
292	347	424	544	664	730	838	961
293	349	425	545	665	736	853	965
294	350	426	551	666	737	856	966
295	351	427	555	667	738	857	967
296	355	428	557	668	739	858	968
297	356	429	559	669	741	859	971
298	358	438	562	670	742	861	972
299	359	439	563	676	744	862	973
301	360	440	568	678	745	863	974
302	361	460	569	679	746	868	975
306	362	468	570	680	747	869	977
307	363	473	602	682	748	905	984
312	364	474	603	683	749	906	987
313	365	475	604	686	750	907	988
315	366	480	605	687	751	912	
316	367	483	606	688	752	914	
317	371	484	607	692	753	915	
318	372	485	608	696	755	917	
319	373	486	609	701	756	918	
320	374	487	614	704	758	920	

**(New) SW Florida NPA  
NXX Codes  
In Numerical Sequence**

202	263	381	455	540	637	743	947
204	264	382	456	541	639	754	948
209	267	384	457	542	641	759	949
216	269	385	458	543	642	763	964
218	272	386	459	549	643	764	980
221	273	389	461	561	645	765	982
222	274	393	462	564	649	766	983
223	275	394	463	565	652	767	989
225	276	395	464	566	655	768	990
226	277	402	465	567	656	769	991
227	278	403	466	571	657	770	992
231	279	414	467	572	658	771	993
232	281	415	469	573	659	772	994
233	282	417	470	574	661	773	995
234	283	418	471	575	662	774	996
235	285	430	472	590	671	775	997
236	286	431	476	591	672	777	998
237	290	432	477	592	673	781	999
238	303	433	478	593	674	793	
239	314	434	479	594	675	841	
240	332	435	481	596	690	842	
241	334	436	482	597	691	843	
242	335	437	489	598	693	848	
243	336	441	490	599	694	849	
244	337	442	491	610	695	850	
245	338	443	494	613	697	851	
246	339	444	495	620	698	860	
247	348	445	498	623	699	890	
248	352	446	505	624	707	902	
249	353	447	513	625	717	910	
250	354	448	514	626	719	930	
251	357	449	522	627	728	931	
253	368	450	523	628	731	936	
254	369	451	524	629	732	939	
255	370	452	525	633	733	940	
261	375	453	526	634	735	945	
262	380	454	527	636	740	946	

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# 941 Overlay Alternative #1

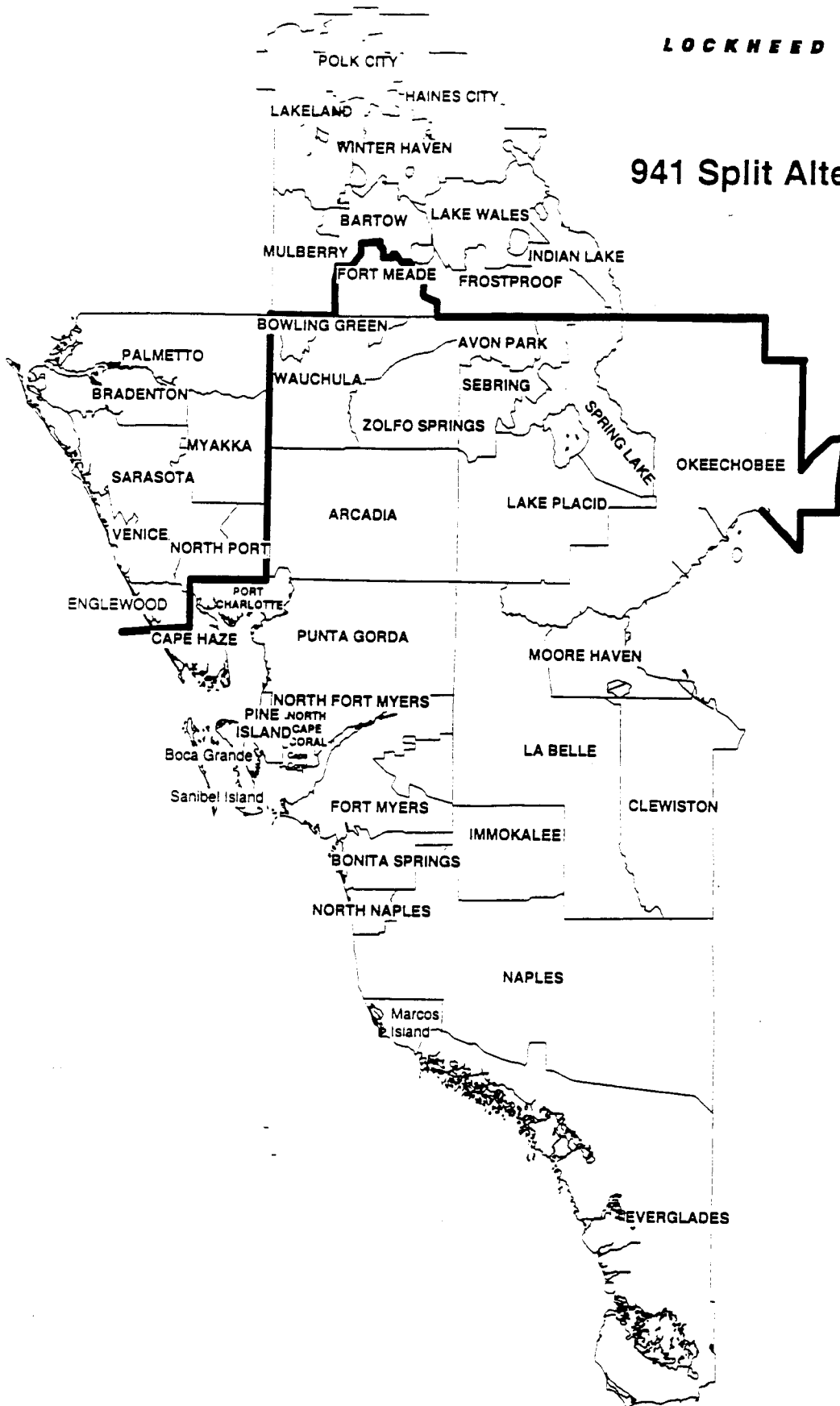




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# 941 Split Alternative # 2



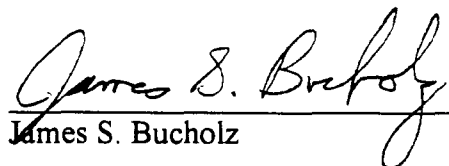
**CERTIFICATE OF SERVICE**

I, James S. Bucholz, do hereby certify that the foregoing **DIRECT TESTIMONY OF PAMELA KENWORTHY ON BEHALF OF LOCKHEED MARTIN IMS** was delivered, by First Class Mail, on this 17th day of March, 1999, to the following:

June C. McKinney  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0863

Kimberly Caswell  
General Attorney  
GTE-Florida, Inc.  
P.O. Box 110  
One Tampa City Center  
Tampa, Florida 33601

Charles J. Rehwinkel  
Senior Attorney  
Sprint-Florida, Incorporated  
P.O. Box 2214  
Tallahassee, Florida 32301

  
James S. Bucholz