

ORIGINAL

MORRISON & FOERSTER LLP

SAN FRANCISCO
LOS ANGELES
SACRAMENTO
ORANGE COUNTY
PALO ALTO
WALNUT CREEK
DENVER

ATTORNEYS AT LAW

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

NEW YORK
LONDON
BRUSSELS
BEIJING
HONG KONG
SINGAPORE
TOKYO

July 6, 1999

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

By Overnight Courier

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

990457-TL
990456-TL

Re: Petition for Approval of NPA Relief Plan for the
561/954 Area Codes

Dear Director:

On behalf of the Florida telecommunications industry, Lockheed Martin IMS, as the North American Numbering Plan Administrator, hereby files an original and 15 copies of the Petition for Approval of NPA Relief Plan for the 561/954 Area Codes. 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

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- RRR _____
- SEC _____
- WAW _____
- OTH _____

Enclosures

Done 7/12/99

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08108 JUL-7 99

FPSC-RECORDS/REPORTING

dc-165458

1 each dkt
msg log

**Before the
FLORIDA PUBLIC SERVICE COMMISSION
Tallahassee, FL 32399-0850**

NANPA, on behalf of the Florida
Telecommunications Industry,

Petition for Approval of NPA Relief Plan
for the 561 and 954 Area Codes

Docket No. _____

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE FLORIDA TELECOMMUNICATIONS INDUSTRY**

The North American Numbering Plan Administrator Lockheed Martin IMS ("NANPA"), in its role as the neutral third party NPA Relief Planner for Florida under the North American Numbering Plan ("NANP") and acting on behalf of the Florida telecommunications industry ("Industry"),¹ hereby petitions the Florida Public Service Commission ("Commission") for approval of a single all services overlay relief plan for the 561 Numbering Plan Area ("NPA") and a single all services overlay relief plan for the 954 NPA, both of which were developed through Industry consensus.² Based upon historical demand for central office codes ("CO Codes") and preliminary 1999 Central Office Code Utilization Survey ("COCUS") information available,

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the state of Florida.

² As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

DOCUMENT NUMBER-DATE

08108 JUL-78

FPSC-RECORDS/REPORTING

NANPA estimated that without NPA relief, the supply of CO Codes for both the 561 and 954 NPAs will exhaust during fourth quarter 2001. Because of an unexpected increase in demand for numbers and to prevent premature exhaust, NANPA declared Extraordinary Jeopardy³ for both NPAs on March 8, 1999 and notified the Commission and the Industry accordingly.⁴ The Industry adopted Final Jeopardy Procedures, establishing a rationing quantity of six CO Codes assignments per month,⁵ beginning with May 1999. Based on that rationing plan, NANPA then adjusted its projections such that the 561 NPA will exhaust third quarter 2002 and the 954 NPA will exhaust second quarter 2002. Industry participants reached consensus on May 19, 1999 to recommend to the Commission all services overlays for the entire geographic area encompassed by the 561 NPA and by the 954 NPA.⁶ The Industry requests that the Commission implement the recommended relief plans for the 561 and 954 NPAs at the same time. In support of this Petition, NANPA submits the following:

³ Pursuant to the Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008), “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.” The Central Office Code (NXX) Guidelines can be accessed on the ATIS Web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

⁴ Interim Jeopardy Procedures, which provide for the assignment of only three CO Codes per month, were implemented immediately upon the declaration of Extraordinary Jeopardy.

⁵ A copy of the Interim and Final Jeopardy Procedures is attached hereto as Exhibit A.

⁶ In order to plan for the introduction of new area codes, NANPA and the Industry utilized the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016) (“NPA Relief Guidelines”). The NPA Relief Guidelines assist NANPA, the industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

I. BACKGROUND

As stated above, preliminary 1999 COCUS data, prior to the implementation of any rationing plans, indicated that the 561 and 954 NPAs will exhaust in fourth quarter 2001. To allow sufficient time to prepare for NPA relief to prevent number exhaust, NANPA notified all affected industry members and the appropriate regulatory bodies in a letter dated April 6, 1999 that NPA relief planning must be addressed. The Industry met on May 19, 1999 at Singer Island, Florida to discuss relief alternatives.⁷ Pursuant to the NPA Relief Guidelines, NANPA presented an Initial Planning Document (“IPD”) at the meeting.⁸ The IPD suggested three relief alternatives for the 561 NPA and two alternatives for the 954 NPA. Three more alternatives for the 561 NPA were proposed by Industry members during the meeting. The information furnished by NANPA to the participants during the meeting included geographical maps of the 561 and 954 NPAs, a description of each relief alternative, including dialing requirements, and the projected life in years of each relief alternative.

At the meeting, the participants discussed the attributes of the various alternatives for each NPA. For the 561 NPA, the Industry discussed six alternatives: an all services distributed overlay – referred to as Alternative #1 in the IPD; three versions of a geographic split – Alternatives #2, #3 and #4; a concentrated growth overlay – Alternative #5; and a wireless only expanded overlay – Alternative #6.⁹ The three geographic split alternatives differed as to where the dividing boundary was placed. The Industry eliminated Alternatives #2 and #3, both

⁷ Minutes of the meeting, including a list of attendees, are attached hereto as Exhibit B.

⁸ See Attachment #3 of Exhibit B.

⁹ See Attachment #4a of Exhibit B.

geographic splits, because the NPA dividing boundary would split communities of interest. The Industry eliminated Alternative #4, the remaining split alternative, because the lives of each resulting NPA were unbalanced. Alternative #6, the wireless only expanded overlay alternative, was eliminated from consideration because it is currently not permitted under Federal Communications Commission regulations, unless a waiver is obtained. Alternative #5, the concentrated growth overlay, was eliminated for several reasons: (1) the unique dialing patterns necessary for concentrated growth overlays often cause customer confusion; (2) special monitoring methods, not currently available, are required to predict the exhaust of the preexisting area code outside of the concentrated overlay area; and (3) the overlay area NPA must be identified as needing relief and a relief plan implemented much earlier than with other forms of relief because a sufficient number of CO Codes must be preserved to serve the area outside of the concentrated overlay area. The Industry eventually reached consensus to recommend Alternative #1, an all services distributed overlay, to the Commission.

Similarly, the Industry reached consensus to recommend the all services distributed overlay alternative to the Commission as the means of relief for the 954 NPA. The Industry discussed two alternatives for the 954 NPA: Alternative #1, an all services distributed overlay, and Alternative #2, a geographic split. The Industry unanimously agreed to eliminate the geographic split alternative because the proposed NPA boundary line would split county boundaries and rate center boundaries, creating confusing dialing patterns for end users. In addition, the split alternative would require many end users to undergo seven digit telephone number changes.

II. DESCRIPTION OF THE PROPOSED RELIEF PLANS FOR THE 561 AND THE 954 NPAs

The all services distributed overlay alternative for the 561 NPA would overlay a new area code over the same geographic area covered by the existing 561 NPA. Similarly, the recommended all services distributed overlay alternative for the 954 NPA would overlay a new area code over the same geographic area covered by the existing 954 NPA.¹⁰ All existing customers would retain their current area code and telephone numbers. Consistent with current Federal Communications Commission regulations, the Industry reached consensus to recommend a 10 digit dialing plan both within and across NPA boundaries of the existing NPAs and the new NPAs. Once the Commission approves the instant petition, NANPA can assign the new NPA within 14 days. The transitional dialing period, which permits end users to dial seven or ten digits, will begin 90 days after the NPA is assigned to relieve 954 and will continue for 180 days.¹¹ The end of transition dialing in the 561 area would follow that of 954 by 90 days. CO Codes will be available in the new NPAs 30 days after the end of the transitional dialing period.

III. CONCLUSION

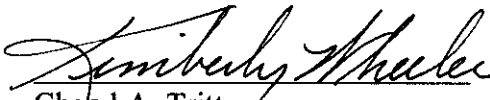
For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests the Commission to implement individual all services distributed overlays as the means of relief for the 561 and 954 NPAs. The Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition. Given the time frame necessary for the

¹⁰ Maps depicting the two overlays are attached hereto as Exhibit C.

¹¹ See Exhibit B for a chart illustrating the NPA relief implementation intervals for the 561 and 954 NPAs. Implementation of split relief plans require additional steps and therefore require longer implementation intervals.

implementation of the relief plans and because the 561 and 954 NPAs, prior to the implementation of any rationing plans, were projected to exhaust in fourth quarter 2000, the Industry also requests that the Commission consider the relief for both NPAs at the same time in order the expedite the relief process.

Respectfully submitted,



Cheryl A. Tritt
Kimberly D. Wheeler

MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
(202) 887-1500

Counsel for Lockheed Martin IMS

July 6, 1999

**NPA 561 Florida
Interim Jeopardy Procedures**

NANPA CO Code Administration has declared this NPA to be in a jeopardy situation on 3/8/99. Therefore, Interim Jeopardy Procedures have been invoked and codes will be rationed as described below. These procedures will remain in effect until the industry reaches consensus on implementation of NPA-Specific Code Conservation Measures.

| Table T-1 Procedure Overview Key Dates and Requirements | | |
|--|--|--|
| A. | Month in which Interim Procedures will first be applied: (“allocation month”) | Beginning March 8,1999 |
| B. | Minimum quantity of codes available for assignment: (“base allocation”) | 3 codes per month (See Note “1”) |
| C. | Maximum requests that may be submitted per month: (“monthly submissions”) | 3 requests per OCN (See Notes “2” and “3”) |
| D. | First day and time that Part 1 code requests will be accepted: (“beginning of submission interval”) | <i>Received no sooner than...</i> <u>2nd</u> business day of month <u>6:00</u> AM Pacific Time |
| E. | Last day and time that Part 1 code requests will be accepted: (“submission deadline”) | <i>Received no later than...</i> <u>7th</u> business day of month <u>6:00</u> PM Pacific Time |
| F. | Requests to be faxed to NANPA Code Administrator: | Anthony Davi Fax # 925-363-8714 Tel. # 925-363-8705 |
| G. | Requirements for participation in monthly allocation process: | Each request must meet all “Eligibility Requirements (See Note “4”) |
| H. | Date on which code assignments will be made: (“code allocation date”) | <i>Codes will be assigned by...</i> <u>15th</u> business day of month |
| I. | Process that will be used to allocate available codes | Monthly allocation process is identified on Tables T-2 & T-3. |
| J. | Code effective date for requests receiving an assignment: | Code effective date will be a minimum of 66 calendar days after the NXX code is assigned (See Note “5”) |

**NPA 561 Florida
Interim Jeopardy Procedures**

Table T-1 Notes:

- 1) Any part of a base allocation that is not assigned in a allocation month will carryover for assignment in the following month (“monthly assignable”).
- 2) Requests are to be specified as 1st, 2nd or 3rd choice; additional requests will be denied.
- 3) Codes will not be reserved; requests to reserve an NXX code will be denied.
- 4) A code request must meet the following **Eligibility Requirements** by the “submission deadline” in order to be eligible to participate in that month’s code allocation process:
 - a) The Part 1 code request data must be complete and accurate.
 - b) An OCN (Operating Company Number) must be a valid assigned number.
 - c) The entity name provided for an applicant’s OCN must match that shown by Bellcore Traffic Routing Administration (TRA) in the Routing Database System (RDBS).
 - d) Companies “doing business as” another company must have a “d/b/a” memo on file with the NANPA CO Code Administrator specifying affected company names and OCNs.
 - e) The requested effective date may be no later than 6 months after the “code allocation date.”
 - f) Requests for a “growth” code must include the Months to Exhaust (MTE) Worksheet.
 - g) A jeopardy COCUS must be submitted to the code administrator within 30 days of the jeopardy being declared. A jeopardy COCUS must be submitted in order to be eligible to receive an NXX in this NPA.
- 5) Expedited code effective dates will not be accepted.

| Table T-2 Code Allocation Process (Eligible Requests Equal To or Less Than Available Codes) | | |
|--|--|--|
| If the total number of <u>eligible</u> requests received by the submission deadline is... | Then available codes will be rationed each month in the following manner... | And the effect upon the subsequent month(s) allocation will be... |
| Equal To the total number of codes available for assignment that month (See Note) | Each request receives a code assignment | No effect; each available code will be assigned |
| Less Than the total number of codes available for assignment that month (Note) | Each request receives a code assignment | Remaining quantity of codes will carryover to following month |
| Greater Than the total number of codes available for assignment that month | Codes will be allocated on an OCN basis; See Table T-3 | Doesn't apply |

**NPA 561 Florida
Interim Jeopardy Procedures**

| Table T-3 Code Allocation Process (Eligible Requests Greater Than Available Codes) | | | |
|---|--|---|---|
| When the following situation exists... | These restrictions will apply... | Codes will be rationed as follows... | And the effect on the following month is... |
| Number of eligible OCNs is Equal to available codes | 2 nd - and 3 rd -choice code requests will be denied | Each OCN receives one NXX assigned to their 1 st -choice request | No effect; each available code will be assigned |
| Number of eligible OCNs is Less Than available codes | 3 rd -choice code requests will be denied | a) Each OCN receives at least one NXX assigned to 1 st -choice request b) Lottery will determine which 2 nd -choice OCN requests receive the remaining code(s) | Any unassigned code quantity will carryover to the following month |
| Number of eligible OCNs is Greater Than available codes | 2 nd - and 3 rd -choice code requests will be denied | a) Some OCNs will receive an NXX; some will not b) Lottery will determine which OCNs receive a code assignment | <ul style="list-style-type: none"> • No effect; Priority Numbers will NOT be assigned • OCNs that do not receive an NXX will have to submit a new request for the following month |

These Interim Procedures do not address the full range of NPA jeopardy code management issues; they are intended to be used on a short-term basis only. The "final" Code Conservation Measures developed by the industry will have to include additional topics.

Expanded long-term procedures will be required to ensure that all industry members (existing code holders as well as potential code applicants) understand the rules and requirements that will apply until a new ("relief") NPA is implemented.

**NPA 954 Florida
Interim Jeopardy Procedures**

NANPA CO Code Administration has declared this NPA to be in a jeopardy situation 3/8/99. Therefore, Interim Jeopardy Procedures have been invoked and codes will be rationed as described below. These procedures will remain in effect until the industry reaches consensus on implementation of NPA-Specific Code Conservation Measures.

| Table T-1 Procedure Overview Key Dates and Requirements | | |
|--|--|--|
| A. | Month in which Interim Procedures will first be applied: ("allocation month") | Beginning March 8, 1999 |
| B. | Minimum quantity of codes available for assignment: ("base allocation") | 3 codes per month (See Note "1") |
| C. | Maximum requests that may be submitted per month: ("monthly submissions") | 3 requests per OCN (See Notes "2" and "3") |
| D. | First day and time that Part 1 code requests will be accepted: ("beginning of submission interval") | <i>Received no sooner than...</i> <u>4th</u> business day of month <u>6:00</u> AM Pacific Time |
| E. | Last day and time that Part 1 code requests will be accepted: ("submission deadline") | <i>Received no later than...</i> <u>9th</u> business day of month <u>6:00</u> PM Pacific Time |
| F. | Requests to be faxed to NANPA Code Administrator: | Anthony Davi Fax # 925-363-8714 Tel. # 925-363-8705 |
| G. | Requirements for participation in monthly allocation process: | Each request must meet all "Eligibility Requirements (See Note "4") |
| H. | Date on which code assignments will be made: ("code allocation date") | <i>Codes will be assigned by...</i> <u>15th</u> business day of month |
| I. | Process that will be used to allocate available codes | Monthly allocation process is identified on Tables T-2 & T-3. |
| J. | Code effective date for requests receiving an assignment: | Code effective date will be a minimum of 66 calendar days after the NXX code is assigned (See Note "5") |

**NPA 954 Florida
Interim Jeopardy Procedures**

Table T-1 Notes:

- 1) Any part of a base allocation that is not assigned in a allocation month will carryover for assignment in the following month (“monthly assignable”).
- 2) Requests are to be specified as 1st, 2nd or 3rd choice; additional requests will be denied.
- 3) Codes will not be reserved; requests to reserve an NXX code will be denied.
- 4) A code request must meet the following **Eligibility Requirements** by the “submission deadline” in order to be eligible to participate in that month’s code allocation process:
 - a) The Part 1 code request data must be complete and accurate.
 - b) An OCN (Operating Company Number) must be a valid assigned number.
 - c) The entity name provided for an applicant’s OCN must match that shown by Bellcore Traffic Routing Administration (TRA) in the Routing Database System (RDBS).
 - d) Companies “doing business as” another company must have a “d/b/a” memo on file with the NANPA CO Code Administrator specifying affected company names and OCNs.
 - e) The requested effective date may be no later than 6 months after the “code allocation date.”
 - f) Requests for a “growth” code must include the Months to Exhaust (MTE) Worksheet.
 - g) A jeopardy COCUS must be submitted to the code administrator within 30 days of the jeopardy being declared. A jeopardy COCUS must be submitted in order to be eligible to receive an NXX in this NPA.
- 5) Expedited code effective dates will not be accepted.

| Table T-2 Code Allocation Process (Eligible Requests Equal To or Less Than Available Codes) | | |
|--|--|--|
| If the total number of <u>eligible requests</u> received by the submission deadline is... | Then available codes will be rationed each month in the following manner... | And the effect upon the subsequent month(s) allocation will be... |
| Equal To the total number of codes available for assignment that month (See Note) | Each request receives a code assignment | No effect; each available code will be assigned |
| Less Than the total number of codes available for assignment that month (Note) | Each request receives a code assignment | Remaining quantity of codes will carryover to following month |
| Greater Than the total number of codes available for assignment that month | Codes will be allocated on an OCN basis; See Table T-3 | Doesn't apply |

**NPA 954 Florida
Interim Jeopardy Procedures**

| Table T-3 Code Allocation Process (Eligible Requests Greater Than Available Codes) | | | |
|---|--|---|---|
| When the following situation exists... | These restrictions will apply... | Codes will be rationed as follows... | And the effect on the following month is... |
| Number of eligible OCNs is Equal to available codes | 2 nd - and 3 rd -choice code requests will be denied | Each OCN receives one NXX assigned to their 1 st -choice request | No effect; each available code will be assigned |
| Number of eligible OCNs is Less Than available codes | 3 rd -choice code requests will be denied | a) Each OCN receives at least one NXX assigned to 1 st -choice request b) Lottery will determine which 2 nd -choice OCN requests receive the remaining code(s) | Any unassigned code quantity will carryover to the following month |
| Number of eligible OCNs is Greater Than available codes | 2 nd - and 3 rd -choice code requests will be denied | a) Some OCNs will receive an NXX; some will not b) Lottery will determine which OCNs receive a code assignment | <ul style="list-style-type: none"> • No effect; Priority Numbers will NOT be assigned • OCNs that do not receive an NXX will have to submit a new request for the following month |

These Interim Procedures do not address the full range of NPA jeopardy code management issues; they are intended to be used on a short-term basis only. The “final” Code Conservation Measures developed by the industry will have to include additional topics.

Expanded long-term procedures will be required to ensure that all industry members (existing code holders as well as potential code applicants) understand the rules and requirements that will apply until a new (“relief”) NPA is implemented.

561 NPA
Florida
Jeopardy Procedures

Extraordinary Code
Conservation Measures
(Split or Overlay)

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Introduction

This document describes Extraordinary Code Conservation Measures for managing central office codes (NXXs) for the duration of the jeopardy condition in this NPA. The purpose of this document is to ensure that all pertinent information is readily available to current and potential code holders. These procedures attempt to provide...

- fair and equitable treatment for all segments of the telecommunications industry
- the most effective means of managing the limited number of unassigned NXXs
- a selection of NPA-specific options for local industry consideration

Questions

Questions regarding the content of this document may be directed to either the NANPA CO Code Administrator or the NANPA NPA Relief Planner. (Refer to the NANPA Web site, www.nanpa.com, for specific contact information.)

Introduction of New NPA

| Table 1 Key Dates For Jeopardy Procedures | | |
|--|--|-------------------|
| Ref. | Milestones | Dates |
| A. | Date on Which This NPA Declared to be in Jeopardy | 03/08/99 |
| B. | Start Date of these Extraordinary Code Conservation Measures | 05/04/99 (Note 1) |
| C. | Estimated/Actual Number of Months From Start of "Extraordinary Measures" to Start of "Mandatory Dialing" | 32 months |
| | | |

Table 1 Notes:

Note 1: By industry-consensus, the date on which these procedures go into effect

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures
Submitting Code Requests**

| Table 2 Need-to-Know Information | | |
|---|---|---|
| Ref. | Key Points | Requirement |
| A. | Minimum quantity of codes available for assignment ("base allocation"): | 6 codes per month (See Note 1) |
| B. | Maximum requests that may be submitted per month ("monthly submissions"): | 6 requests per OCN (See Notes 2 & 3) |
| C. | Last day and time Part 1 code requests will be accepted ("submission deadline")**: | <i>Received no later than...</i> 7th Business Day of the Month 4:00 PM, Pacific Time |
| D. | First day and time Part 1 code requests will be accepted ("submission start date")++: | <i>Received no earlier than...</i> 2nd Business Day of the Month 8:00 AM, Pacific Time |
| E. | Part 1 code requests to be faxed to NANPA CO Code Administrator: | Anthony Davi Fax #: 925-363-8714 (Tel. # 925-363-8705) |
| F. | Requirements for participating in monthly rationing process: | Part 1 requests must meet all "Eligibility Requirements" (See Notes 4, 5 & 6) |
| G. | Part 3 response will be issued on or before: | 17th business day of the month 4:00 PM Pacific Time |
| H. | Process that will be used to allocate available codes: | Monthly rationing process is identified on Table 3 & Table 4. |
| I. | Method by which initial, growth and "new application" requests will receive NXX | ONE POOL (See Note 8) |
| | | |

** "Submission Deadline" is the date on which the industry-standard 66-day processing interval begins
++ "Submission Start Date" in conjunction with submission deadline determines "submission interval" (length time applicants have to submit code requests for any given rationing month)

561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures

Table 2 Notes:

1) Monthly Assignable Codes (Ref. Table 2, Note 1)

- a) "Base allocation" refers to the number of NXXs that will be available for assignment each month under these jeopardy procedures. This figure is determined by dividing the number of codes available at implementation of these procedures by the number of months estimated/actual until the planned start of mandatory dialing.
 - i) This quantity may be revised, upward or downward, depending upon the relief plan and relief schedule approved by the state Regulatory Commission.
 - ii) The industry will reconvene for the implementation meeting upon the issuance of the Order by the Florida Public Service Commission. The purpose will be to determine whether there is a need to adjust the base allocation figure and, if so, to what quantity.
- b) If the base allocation for any given month is not fully assigned, the unassigned quantity will "carryover" to the following month. This quantity and the base allocation will then be available for assignment in that month.
- c) In the event that NXXs are recovered during this code rationing (jeopardy) period, the monthly "base allocation" will be recalculated to reflect this larger number of available codes.
 - i) The CO Code Administrator may adjust the monthly allocation as a result of code recovery without seeking industry consensus.
 - ii) CO Code Administration will post on the NANPA Web site a notice of recalculated monthly allotment (under "Bulletin Board"/"Jeopardy Information"); Change notice will be distributed to industry participants, although applicants should check the NANPA Web site, www.nanpa.com, regularly.

2) Submitting Requests (Ref. Table 2, Note 2)

- a) Each Part 1 code request is to be designated by the applicant as 1st, 2nd or nth choice ("nth" represents the maximum number permitted).
 - i) If the applicant submits multiple requests, but does not indicate "choice," the code administrator will assign 1st, 2nd or nth choice based on the sequence in which the requests were received on the NANPA Code Administrator's fax machine.
 - ii) If an applicant submits more than "n" code requests (the maximum permitted), only the first "n" received will be accepted; any additional requests received that calendar month will be denied.
- b) For these jeopardy procedures, "applicant" is defined as any entity having a valid "OCN" (Operating Company Number/Company Code).

3) Requests to Reserve a Code (Ref. Table 2, Note 3)

- a) Requests to reserve an NXX code will be denied for the duration of these jeopardy procedures; if it becomes necessary to extend/continue jeopardy in this NPA for any reason, code reservation requests will be denied for that extended period of time.

**561 NPA Florida
Jeopardy Procedures**

Extraordinary Code Conservation Measures

4) Eligibility Requirements (Ref. Table 2, Note 4)

- a) ***A code request must meet all eligibility requirements by the monthly “submission deadline” in order to be eligible to participate in that month’s code rationing process.***
 - i) The Part 1 code request data must be complete and accurate; requests that have incomplete or inaccurate data will be suspended.
 - ii) Requests received after the submission deadline in any given month will be included in the following month’s rationing process provided that all “Eligibility Requirements” have been met by that next month’s submission deadline.
- b) ***A valid NPA/Rate Center association must be provided on the Part 1 code request.***
 - i) As of the requested effective date, the specified rate center must physically reside within the boundaries of the specified NPA.
 - ii) If the requested effective date falls within or after the permissive dialing period and the rate center is moving to the new NPA, then the new NPA must be specified.
- c) ***A valid entity name/OCN association must be provided on the Part 1 code request.***
 - i) The entity name for the applicant’s specified OCN must match the OCN/entity name association shown in Bellcore’s Routing Database System (RDBS).
 - ii) Companies “doing business as” another company must have a “d/b/a” memo on file with the NANPA CO Code Administrator specifying affected company names and OCNs.
- d) ***The applicant OCN must be authorized to provide service in the jeopardy NPA.***
 - i) The type of authorization (CPCN #, tariff # or FCC license #) must be specified.
 - ii) The type of entity requesting the service (franchised local exchange carrier, competitive local exchange service carrier, wireless, etc.) must be specified.
 - iii) The type of service to be provided by the requested code (end office, paging, cellular, PCS, etc.) must be specified.
- e) ***The requested effective date may be no more than 6 months into the future.***

5) Supporting Data Options (Ref. Table 2, Note 5)

- a) A Jeopardy COCUS must be on file for this NPA from each OCN submitting a code request.
 - i) This is required in order for the request to be eligible to receive an NXX assignment.
 - ii) For current code holders, the Jeopardy COCUS is to be submitted to the NANPA Code Administrator within 30 days of jeopardy being declared.
 - iii) For new market entrants, the Jeopardy COCUS is to be submitted with the code request.

- b) A Months to Exhaust (MTE) Worksheet must be received for each “growth” code request.

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

6) Suspended and Denied Requests (Ref. Table 2, Note 6)

- a) If the required Part 1 data (or industry-specified supporting documentation) is not received by the original month's submission deadline, the request will be suspended and will be ineligible for participation in the rationing process/lottery; this suspension will continue until all eligibility requirements have been met.
- b) If a request has been suspended, but required data (or industry-specified supporting documentation) is later received by the submission deadline of a subsequent month, the request will be included in that month's code rationing process.
- c) Requests will be denied in the following situations:
 - i) Code request(s) submitted by an OCN that exceed the "6" per month maximum
 - ii) The requested effective date is greater than 6 months.
 - iii) The code applicant is not authorized/certified to provide service in the state/NPA
 - iv) The request is to reserve an NXX code.

7) Assigned Effective Date (Ref. Table 2, Note 7)

- a) If a request to reassign a code is received before the allowed reassignment submission date, the request will be denied
- b) For code assignments that do not require code allocation procedures or lottery, the code effective date will be at least 66 calendar days from the "submission deadline" in accordance with *Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)*.
 - i) 14 calendar days for code administration processing
 - ii) 7 calendar days for AOCN processing
 - iii) 45 calendar days for industry notification (NXX data available in RDBS)
- c) The NANPA Code Administrator will adjust the requested code effective date, as necessary, to ensure the AOCN processing interval of 7 calendar days and the minimum RDBS industry notification interval of 45 calendar days.
- d) The authorized code effective date will be reflected on the Part 3 response sent to the code applicant.
- e) Expedited code effective dates will not be granted for the duration of jeopardy in this NPA.

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

8) One-pool (Ref. Table 2, Note 8)

- a) *There will be only one "pool"* from which NXX code assignments will be made
 - i) There will be no distinction as to whether an applicant is an existing service provider or a new market entrant.
 - ii) There will be no distinction as to whether a request is for an initial code, growth code or "new application" (i.e., "specialized use") of a code.
 - iii) There will be no distinction as to whether an applicant already has an NXX code assigned to a specific switch regardless of Rate Center, assigned to serve a specific Rate Center regardless of serving switch, or assigned to serve a specific Rate Center from a specific switch.

Code Rationing versus Code Allocation

- 1) The terms "Code Rationing" and "Code Allocation" as used in these jeopardy procedures, both refer to extraordinary code conservation measures in a declared jeopardy NPA(s).
- 2) The term "**Code Rationing**" ... refers to a situation in which there is a specified *limit on the number of codes that may be assigned in any given month*.
- 3) The term "**Code Allocation**"... refers to the *means of determining which code requests will receive a CO code assignment in any given month*. Lottery is one method of allocation.

Code Rationing Process

| Table 3 Total Eligible Requests Equal To or Less Than Available Codes** | | |
|--|--|---|
| If the total number of <u>eligible requests</u> received by the submission deadline is... | Then available codes will be rationed each month in the following manner... | And the effect upon the subsequent month(s) rationing will be... |
| Equal To the total number of codes available for assignment that month (See Note) | Each request receives a code assignment | No effect; each available code will be assigned |
| Less Than the total number of codes available for assignment that month (Note) | Each request receives a code assignment | Remaining quantity of codes will carryover to following month |

****See Table 4 for process if total number of eligible requests is greater than available codes**

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Governing Principle for Code Allocation

In any given month, each OCN submitting an eligible request will receive one code before any OCN receives two codes; each OCN submitting eligible requests for more than one code will each receive two codes before any OCN receives more than two codes, etc...

Code Allocation Process

| Table 4 Total Eligible Requests Greater Than Available Codes | | | |
|---|--|--|--|
| When the following situation exists... | These restrictions will apply... | Codes will be allocated as follows... | And the effect on the following month is... |
| Total number of eligible OCNs is Equal to available codes | 2 nd - and nth-choice code requests will be denied | Each OCN receives one NXX assigned to their 1 st -choice request | No effect; each available code will be assigned |
| Total number of eligible OCNs is Less Than available codes | None | <ul style="list-style-type: none"> a) Each OCN receives at least one NXX assigned to their 1st-choice request b) Lottery will determine which OCN(s) receive the remaining code(s) | Any unassigned code quantity will carryover to the following month |
| Total number of eligible OCNs is Greater Than available codes | 2nd- and nth-choice code requests will be denied | <ul style="list-style-type: none"> a) Only eligible 1st-choice code requests will participate in allocation process b) Lottery will be used to determine which OCNs receive a code assignment c) Some OCNs will receive an NXX; some will not | Priority Numbers will be used Refer to details in "Priority Numbers" |

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Priority Numbers

- 1) OCNs that don't receive a code in any given month's lottery will receive a Priority Number ("PN"). Priority Numbers will be drawn by lottery and will determine the order in which these OCN requests receive an NXX in the subsequent month(s).
 - a) Only 1st-choice code requests that meet all eligibility requirements by the monthly submission deadline will receive a priority number.
 - b) The OCN(s) that receive a priority number will NOT have to resubmit their code request unless the OCN wishes to make some change, correction or update to the request; the code administrator will retain the Part 1 until the OCN request receives its NXX assignment.
 - c) OCN requests with Priority Numbers will receive their code assignment before any new requests submitted in that calendar month receive a code. This may mean that these requests receive a Priority Number for code assignment in a future month.
 - d) The total number of Priority Number requests assigned an NXX in any given month will not exceed the total number of codes available for assignment in that month (base allotment plus any carryover). If there are still PN requests "in queue" for an NXX, they will be assigned in each subsequent month until all priority number requests have received a code.
 - e) If OCN has a Priority Number, they may still submit additional requests during that same month.

Requests for Previously-Assigned NXXs

- 1) An NXX will not be effective in both the "old" and the "new" NPA until 60 calendar days following the start of mandatory dialing.
- 2) This rule applies in either of the following situations:
 - a) NXXs staying in the "old" NPA when making an assignment for a Rate Center that will move to the "new" NPA.
 - b) NXXs moving to the "new" NPA when making an assignment for a Rate Center that will stay in the "old" NPA.
- 3) This restriction will not apply if the approved NPA relief method is an overlay.

**561 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Code Set-Aside for Overlay

- 1) The quantity of codes to be set aside for “new entrants,” in accordance with the FCC overlay 90-day rule, needs to be determined by NANPA with input from industry members.
- 2) New carriers that submit code requests (in an overlay NPA scenario) will receive at least one code from the “new entrant”.
- 3) Subsequent to receipt of their first NXX, new carriers would then participate with existing carriers under these extraordinary jeopardy procedures in obtaining any additional code(s).
- 4) At 90 days prior to the industry-established start of mandatory dialing, the NANPA Code Administrator will begin releasing codes that have been set aside for new market entrants.
 - a) This number of codes to be released will be calculated each month by dividing the number of codes left in the set-aside pool after making any assignments that month by the number of months remaining until the start of mandatory dialing of the overlay NPA code.
 - b) Codes released from the set-aside pool will be available for assignment to other industry segment requests.

Modifications to These Procedures

Pertinent sections of these procedures will be modified in the following circumstances:

1. If, during Industry relief planning meetings, consensus is reached to add, modify or delete specific dates and intervals identified on Table 1 through Table 4.
2. If the State Commission NPA Relief Order specifies implementation dates that are different from those initially proposed by the industry relief planning team.

954 NPA
Florida
Jeopardy Procedures

Extraordinary Code
Conservation Measures
(Split or Overlay)

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Introduction

This document describes Extraordinary Code Conservation Measures for managing central office codes (NXXs) for the duration of the jeopardy condition in this NPA. The purpose of this document is to ensure that all pertinent information is readily available to current and potential code holders. These procedures attempt to provide...

- fair and equitable treatment for all segments of the telecommunications industry
- the most effective means of managing the limited number of unassigned NXXs
- a selection of NPA-specific options for local industry consideration

Questions

Questions regarding the content of this document may be directed to either the NANPA CO Code Administrator or the NANPA NPA Relief Planner. (Refer to the NANPA Web site, www.nanpa.com, for specific contact information.)

Introduction of New NPA

| Table 1 Key Dates For Jeopardy Procedures | | |
|--|--|-------------------|
| Ref. | Milestones | Dates |
| A. | Date on Which This NPA Declared to be in Jeopardy | 03/08/99 |
| B. | Start Date of these Extraordinary Code Conservation Measures | 05/04/99 (Note 1) |
| C. | Estimated/Actual Number of Months From Start of "Extraordinary Measures" to Start of "Mandatory Dialing" | 30 months |
| | | |

Table 1 Notes:

Note 1: By industry-consensus, the date on which these procedures go into effect

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Submitting Code Requests

| Table 2 Need-to-Know Information | | |
|---|--|---|
| Ref. | Key Points | Requirement |
| A. | Minimum quantity of codes available for assignment ("base allocation"): | 6 codes per month (See Note 1) |
| B. | Maximum requests that may be submitted per month ("monthly submissions"): | 6 requests per OCN (See Notes 2 & 3) |
| C. | Last day and time Part 1 code requests will be accepted ("submission deadline")**: | <i>Received no later than...</i> 9th Business Day of the Month 4:00 PM, Pacific Time |
| D. | First day and time Part 1 code requests will be accepted ("submission start date")+: | <i>Received no earlier than...</i> 4th Business Day of the Month 8:00 AM, Pacific Time |
| E. | Part 1 code requests to be faxed to NANPA CO Code Administrator: | Anthony Davi Fax #: 925-363-8714 (Tel. # 925-363-8705) |
| F. | Requirements for participating in monthly rationing process: | Part 1 requests must meet all "Eligibility Requirements" (See Notes 4, 5 & 6) |
| G. | Part 3 response will be issued on or before: | 19th business day of the month 4:00 PM Pacific Time |
| H. | Process that will be used to allocate available codes: | Monthly rationing process is identified on Table 3 & Table 4. |
| I. | Method by which initial, growth and "new application" requests will receive NXX | ONE POOL (See Note 8) |
| | | |

** "Submission Deadline" is the date on which the industry-standard 66-day processing interval begins
 ++ "Submission Start Date" in conjunction with submission deadline determines "submission interval" (length time applicants have to submit code requests for any given rationing month)

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Table 2 Notes:

1) Monthly Assignable Codes (Ref. Table 2, Note 1)

- a) "Base allocation" refers to the number of NXXs that will be available for assignment each month under these jeopardy procedures. This figure is determined by dividing the number of codes available at implementation of these procedures by the number of months estimated/actual until the planned start of mandatory dialing.
 - i) This quantity may be revised, upward or downward, depending upon the relief plan and relief schedule approved by the state Regulatory Commission.
 - ii) The industry will reconvene for the implementation meeting upon the issuance of the Order by the Florida Public Service Commission. The purpose will be to determine whether there is a need to adjust the base allocation figure and, if so, to what quantity.
- b) If the base allocation for any given month is not fully assigned, the unassigned quantity will "carryover" to the following month. This quantity and the base allocation will then be available for assignment in that month.
- c) In the event that NXXs are recovered during this code rationing (jeopardy) period, the monthly "base allocation" will be recalculated to reflect this larger number of available codes.
 - i) The CO Code Administrator may adjust the monthly allocation as a result of code recovery without seeking industry consensus.
 - ii) CO Code Administration will post on the NANPA Web site a notice of recalculated monthly allotment (under "Bulletin Board"/"Jeopardy Information"); Change notice will be distributed to industry participants, although applicants should check the NANPA Web site, www.nanpa.com, regularly.

2) Submitting Requests (Ref. Table 2, Note 2)

- a) Each Part 1 code request is to be designated by the applicant as 1st, 2nd or nth choice ("nth" represents the maximum number permitted).
 - i) If the applicant submits multiple requests, but does not indicate "choice," the code administrator will assign 1st, 2nd or nth choice based on the sequence in which the requests were received on the NANPA Code Administrator's fax machine.
 - ii) If an applicant submits more than "n" code requests (the maximum permitted), only the first "n" received will be accepted; any additional requests received that calendar month will be denied.
- b) For these jeopardy procedures, "applicant" is defined as any entity having a valid "OCN" (Operating Company Number/Company Code).

3) Requests to Reserve a Code (Ref. Table 2, Note 3)

- a) Requests to reserve an NXX code will be denied for the duration of these jeopardy procedures; if it becomes necessary to extend/continue jeopardy in this NPA for any reason, code reservation requests will be denied for that extended period of time.

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

4) Eligibility Requirements (Ref. Table 2, Note 4)

- a) *A code request must meet all eligibility requirements by the monthly "submission deadline" in order to be eligible to participate in that month's code rationing process.*
 - i) The Part 1 code request data must be complete and accurate; requests that have incomplete or inaccurate data will be suspended.
 - ii) Requests received after the submission deadline in any given month will be included in the following month's rationing process provided that all "Eligibility Requirements" have been met by that next month's submission deadline.
- b) *A valid NPA/Rate Center association must be provided on the Part 1 code request.*
 - i) As of the requested effective date, the specified rate center must physically reside within the boundaries of the specified NPA.
 - ii) If the requested effective date falls within or after the permissive dialing period and the rate center is moving to the new NPA, then the new NPA must be specified.
- c) *A valid entity name/OCN association must be provided on the Part 1 code request.*
 - i) The entity name for the applicant's specified OCN must match the OCN/entity name association shown in Bellcore's Routing Database System (RDBS).
 - ii) Companies "doing business as" another company must have a "d/b/a" memo on file with the NANPA CO Code Administrator specifying affected company names and OCNs.
- d) *The applicant OCN must be authorized to provide service in the jeopardy NPA.*
 - i) The type of authorization (CPCN #, tariff # or FCC license #) must be specified.
 - ii) The type of entity requesting the service (franchised local exchange carrier, competitive local exchange service carrier, wireless, etc.) must be specified.
 - iii) The type of service to be provided by the requested code (end office, paging, cellular, PCS, etc.) must be specified.
- e) *The requested effective date may be no more than 6 months into the future.*

5) Supporting Data Options (Ref. Table 2, Note 5)

- a) A Jeopardy COCUS must be on file for this NPA from each OCN submitting a code request.
 - i) This is required in order for the request to be eligible to receive an NXX assignment.
 - ii) For current code holders, the Jeopardy COCUS is to be submitted to the NANPA Code Administrator within 30 days of jeopardy being declared.
 - iii) For new market entrants, the Jeopardy COCUS is to be submitted with the code request.
- b) A Months to Exhaust (MTE) Worksheet must be received for each "growth" code request.

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

6) Suspended and Denied Requests (Ref. Table 2, Note 6)

- a) If the required Part 1 data (or industry-specified supporting documentation) is not received by the original month's submission deadline, the request will be suspended and will be ineligible for participation in the rationing process/lottery; this suspension will continue until all eligibility requirements have been met.
- b) If a request has been suspended, but required data (or industry-specified supporting documentation) is later received by the submission deadline of a subsequent month, the request will be included in that month's code rationing process.
- c) Requests will be denied in the following situations:
 - i) Code request(s) submitted by an OCN that exceed the "6" per month maximum
 - ii) The requested effective date is greater than 6 months.
 - iii) The code applicant is not authorized/certified to provide service in the state/NPA
 - iv) The request is to reserve an NXX code.

7) Assigned Effective Date (Ref. Table 2, Note 7)

- a) If a request to reassign a code is received before the allowed reassignment submission date, the request will be denied
- b) For code assignments that do not require code allocation procedures or lottery, the code effective date will be at least 66 calendar days from the "submission deadline" in accordance with *Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)*.
 - i) 14 calendar days for code administration processing
 - ii) 7 calendar days for AOCN processing
 - iii) 45 calendar days for industry notification (NXX data available in RDBS)
- c) The NANPA Code Administrator will adjust the requested code effective date, as necessary, to ensure the AOCN processing interval of 7 calendar days and the minimum RDBS industry notification interval of 45 calendar days.
- d) The authorized code effective date will be reflected on the Part 3 response sent to the code applicant.
- e) Expedited code effective dates will not be granted for the duration of jeopardy in this NPA.

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

8) "One-pool" (Ref. Table 2, Note 8)

- a) *There will be only one "pool"* from which NXX code assignments will be made
 - i) There will be no distinction as to whether an applicant is an existing service provider or a new market entrant.
 - ii) There will be no distinction as to whether a request is for an initial code, growth code or "new application" (i.e., "specialized use") of a code.
 - iii) There will be no distinction as to whether an applicant already has an NXX code assigned to a specific switch regardless of Rate Center, assigned to serve a specific Rate Center regardless of serving switch, or assigned to serve a specific Rate Center from a specific switch.

Code Rationing versus Code Allocation

- 1) The terms "Code Rationing" and "Code Allocation" as used in these jeopardy procedures, both refer to extraordinary code conservation measures in a declared jeopardy NPA(s).
- 2) The term "**Code Rationing**" ... refers to a situation in which there is a specified *limit on the number of codes that may be assigned in any given month*.
- 3) The term "**Code Allocation**"... refers to the *means of determining which code requests will receive a CO code assignment in any given month*. Lottery is one method of allocation.

Code Rationing Process

| Table 3 Total Eligible Requests Equal To or Less Than Available Codes** | | |
|--|--|---|
| If the total number of <u>eligible requests</u> received by the submission deadline is... | Then available codes will be rationed each month in the following manner... | And the effect upon the subsequent month(s) rationing will be... |
| Equal To the total number of codes available for assignment that month (See Note) | Each request receives a code assignment | No effect; each available code will be assigned |
| Less Than the total number of codes available for assignment that month (Note) | Each request receives a code assignment | Remaining quantity of codes will carryover to following month |

****See Table 4 for process if total number of eligible requests is greater than available codes**

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Governing Principle for Code Allocation

In any given month, each OCN submitting an eligible request will receive one code before any OCN receives two codes; each OCN submitting eligible requests for more than one code will each receive two codes before any OCN receives more than two codes, ect....

Code Allocation Process

| Table 4 Total Eligible Requests Greater Than Available Codes | | | |
|---|--|--|---|
| When the following situation exists... | These restrictions will apply... | Codes will be allocated as follows... | And the effect on the following month is... |
| Total number of eligible OCNs is Equal to available codes | 2 nd - and nth-choice code requests will be denied | Each OCN receives one NXX assigned to their 1 st -choice request | No effect; each available code will be assigned |
| Total number of eligible OCNs is Less Than available codes | None | <ul style="list-style-type: none"> a) Each OCN receives at least one NXX assigned to their 1st-choice request b) Lottery will determine which OCN(s) receive the remaining code(s) | Any unassigned code quantity will carryover to the following month |
| Total number of eligible OCNs is Greater Than available codes | 2nd- and nth-choice code requests will be denied | <ul style="list-style-type: none"> a) Only eligible 1st-choice code requests will participate in allocation process b) Lottery will be used to determine which OCNs receive a code assignment c) Some OCNs will receive an NXX; some will not | <p>Priority Numbers will be used</p> <p>Refer to details in "Priority Numbers"</p> |

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Priority Numbers

- 1) OCNs that don't receive a code in any given month's lottery will receive a Priority Number ("PN"). Priority Numbers will be drawn by lottery and will determine the order in which these OCN requests receive an NXX in the subsequent month(s).
 - a) Only 1st-choice code requests that meet all eligibility requirements by the monthly submission deadline will receive a priority number.
 - b) The OCN(s) that receive a priority number will NOT have to resubmit their code request unless the OCN wishes to make some change, correction or update to the request; the code administrator will retain the Part 1 until the OCN request receives its NXX assignment.
 - c) OCN requests with Priority Numbers will receive their code assignment before any new requests submitted in that calendar month receive a code. This may mean that these requests receive a Priority Number for code assignment in a future month.
 - d) The total number of Priority Number requests assigned an NXX in any given month will not exceed the total number of codes available for assignment in that month (base allotment plus any carryover). If there are still PN requests "in queue" for an NXX, they will be assigned in each subsequent month until all priority number requests have received a code.
 - e) If OCN has a Priority Number, they may still submit additional requests during that same month.

Requests for Previously-Assigned NXXs

- 1) An NXX will not be effective in both the "old" and the "new" NPA until 60 calendar days following the start of mandatory dialing.
- 2) This rule applies in either of the following situations:
 - a) NXXs staying in the "old" NPA when making an assignment for a Rate Center that will move to the "new" NPA.
 - b) NXXs moving to the "new" NPA when making an assignment for a Rate Center that will stay in the "old" NPA.
- 3) This restriction will not apply if the approved NPA relief method is an overlay.

**954 NPA Florida
Jeopardy Procedures
Extraordinary Code Conservation Measures**

Code Set-Aside for Overlay

- 1) The quantity of codes to be set aside for “new entrants,” in accordance with the FCC overlay 90-day rule, needs to be determined by NANPA with input from industry members.
- 2) New carriers that submit code requests (in an overlay NPA scenario) will receive at least one code from the “new entrant”.
- 3) Subsequent to receipt of their first NXX, new carriers would then participate with existing carriers under these extraordinary jeopardy procedures in obtaining any additional code(s).
- 4) At 90 days prior to the industry-established start of mandatory dialing, the NANPA Code Administrator will begin releasing codes that have been set aside for new market entrants.
 - a) This number of codes to be released will be calculated each month by dividing the number of codes left in the set-aside pool after making any assignments that month by the number of months remaining until the start of mandatory dialing of the overlay NPA code.
 - b) Codes released from the set-aside pool will be available for assignment to other industry segment requests.

Modifications to These Procedures

Pertinent sections of these procedures will be modified in the following circumstances:

1. If, during Industry relief planning meetings, consensus is reached to add, modify or delete specific dates and intervals identified on Table 1 through Table 4.
2. If the State Commission NPA Relief Order specifies implementation dates that are different from those initially proposed by the industry relief planning team.

**MEETING MINUTES OF THE
561 NPA and 954 NPA RELIEF PLANNING INDUSTRY MEETING
SINGER ISLAND, FLORIDA, WEDNESDAY, MAY 19, 1999**

WELCOME AND INTRODUCTIONS

Pamela Kenworthy, Lockheed Martin NPA Relief Planner, asked the attendees to introduce themselves and identify the companies they represented. There were 25 participants at the meeting representing ten different entities. See Attachment #1 for the names of those who attended the meeting. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA TRANSITION

Ms. Kenworthy shared specific points regarding the transition of the North American Numbering Plan Administration (NANPA) including the NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address: www.atis.org/atis/nanp/nanpreq.htm.

Ms. Kenworthy provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. Ms. Kenworthy also provided the participants with a list of NANPA staff members and their contact information.

REVIEW OF INDUSTRY GUIDELINES AND ATIS ORGANIZATION

Ms. Kenworthy stated that the purpose of the meeting was for the industry to come to consensus on a single NPA relief plan for each NPA to submit to the Florida Public Service Commission for consideration. She summarized the NPA relief planning process, including goals and objectives, and how the process is governed by certain guidelines developed by the telecommunications industry. She also 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 obtained from the internet at www.atis.org/atis/clc/inc/incdocs.htm. In addition, Ms. Kenworthy described the relationship of the Alliance for Telecommunications Industry Solutions ("ATIS") organization to the relief planning process, including the ATIS consensus process and the consensus process described in the industry guidelines.

It was noted that only consensus items would be recorded in the minutes and statements which were not adopted pursuant to the consensus process could be included in the meeting minutes in the form of a "Statement for the Record" by the particular company or companies which supported the statement. The meeting format was reviewed and participants were reminded that the meeting minutes serve as the basis of the filing of the recommended relief plan with the Florida Public Service Commission.

NPA RELIEF ALTERNATIVE ATTRIBUTES

Ms. Kenworthy reviewed a summary of General NPA Relief Attributes (Attachment # 3). Consensus was reached to omit the last bullet point under the column heading Splits and the column heading Overlays. Participants also reached consensus to make other modifications to the General NPA Relief Attributes.

Statement for the Record from BellSouth Cellular Corporation, BellSouth and Sprint PCS

One of two primary attributes of a distributed overlay compared to a geographic split is that it provides a longer relief period than a split. That is to say, at least one geographic area resulting from a split will require relief before a distributed overlay, implemented in the same area, would require relief. (The second primary attribute of a distributed overlay is that no existing customers are required to change their ten digit telephone numbers as shown in the "Overlays" column on the Attributes sheet.)

CODE ASSIGNMENT HISTORY FOR 561

Industry participants were reminded that 220 codes remain in the 561 NPA. Extraordinary Jeopardy was declared in the 561 NPA in March of 1999. Participants discussed the Jeopardy procedures, including base allocation and maximum code requests per OCN per month, that were adopted pursuant to the declaration of Jeopardy. The industry adopted Final Jeopardy Procedures during an earlier industry meeting establishing a rationing quantity of six CO Codes assignments per month beginning with May 1999.

INITIAL PLANNING DOCUMENT FOR 561

Demographic information from the U. S. Census Bureau was shared with the industry participants and detailed information sheets about each county in the 561 NPA were distributed. The participants reviewed and discussed the Initial Planning Document ("IPD") which was prepared and distributed prior to the meeting. See Attachment #4 for a copy of the IPD. The IPD proposed and described three relief alternatives for the 561 NPA: an all services distributed overlay (Alternative #1) and two geographic splits (Alternative #2 and #3). The geographic boundary between the two area codes differed in Alternatives #2 and #3. The IPD contained maps and the projected lives of each alternative.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 561

Three relief alternatives, which were not included in the IPD, were proposed for consideration: a single geographic split (Alternative #4), a concentrated growth overlay (Alternative #5), and a wireless only expanded overlay (Alternative #6). These alternatives have been added to the attached IPD. The life of the wireless only statewide expanded overlay is not available.

ELIMINATION OF ALTERNATIVES

Participant discussed the elimination of relief alternatives for the 561 NPA. Consensus was reached to eliminate Alternative # 4, a single geographic split, due to unbalanced lives. Next, consensus was reached to eliminate Alternatives # 2 and # 3, both single geographic splits, because communities of interest were divided. Elimination of Alternatives # 2, # 3 and # 4 were also excluded for the same reasons outlined in Attachment # 3 under attributes of a split. Alternative # 5, a concentrated growth overlay, was eliminated by consensus for the same reasons listed in Attachment #3 under attributes of a concentrated growth overlay. Alternative # 6, a statewide wireless only overlay, was eliminated by consensus because participants were aware it would violate current FCC rules and because participants felt it was not the proper forum to address this statewide issue. The participants reached consensus to recommend Alternative #1, an all services distributed overlay to the Florida Public Service Commission as the means of relief for the 561 NPA.

CODE ASSIGNMENT HISTORY FOR 954

Two hundred nine codes remain in the 954 NPA. Participants were reminded of the base allocation and maximum code requests per OCN per month that were developed as a result of the Extraordinary Jeopardy declaration in March 1999. The industry adopted Final Jeopardy Procedures during an earlier industry meeting establishing a rationing quantity of six CO Codes assignments per month beginning with May 1999.

INITIAL PLANNING DOCUMENT FOR 954

Demographic information from the U. S. Census Bureau was shared with the industry participants and detailed information sheets about each county in the 954 NPA were distributed. The participants reviewed and discussed the Initial Planning Document ("IPD") which was prepared and distributed prior to the meeting. See Attachment #4 for a copy of the IPD. The IPD proposed and described two relief alternatives for the 954 NPA: an all services distributed overlay (Alternative #1) and a geographic split (Alternative #2). The IPD contained maps and the projected lives of each alternative.

ADDITIONAL ALTERNATIVES FROM THE INDUSTRY FOR 954

Ms. Kenworthy sought proposals from the industry for additional alternatives. No additional alternatives were proposed.

ELIMINATION OF ALTERNATIVES FOR 954

Unanimous consensus was reached to eliminate Alternative # 2 because this alternative splits county lines and rate center lines which would cause confusing dialing patterns. It would also necessitate number 7-digit number changes. The participants reached consensus to recommend Alternative #1, an all services distributed overlay, to the Florida Public Service Commission as the means of relief for the 954 NPA.

IMPLEMENTATION INTERVALS FOR 561 AND 954

The participants reached consensus to recommend the following relief implementation intervals to the Florida Public Service Commission for both the 561 and the 954 NPAs.

| | OVERLAY | SPLIT |
|---------------------------------------|---|---|
| Commission Decision (T=0) | | |
| NANPA Assigns NPAs | T + 14 Days | T + 14 Days |
| Transition Dialing Begins | T + 90 + 14 Days = T + 104 Days | |
| Permissive Dialing Begins | | T + 180* + 14 Days = T + 194 Days |
| Mandatory Dialing (Minimum) | T + 180* + 90 + 14 Days = T + 284 Days | T + 270 + 180 * + 14 Days = T + 464 Days |
| Code Effective After Mandatory | 30 Days | 30 Days |

* Add 90 days for whichever NPA that exhausts first for a staggered implementation

DIALING PLAN AND INDUSTRY COMMITMENT FOR TEST NUMBER

Consensus was reached to adopt a dialing plan consistent with FCC requirements for 10-digit dialing in overlay situations. Seven digit local dialing will continue to be employed across the 561/954 NPA boundary during the transition dialing period. Cross boundary dialing will require post dial delay where there are code conflicts during the transition dialing period.

BellSouth will provide a test number for each NPA.

SUBMISSION TO THE FLORIDA PUBLIC SERVICE COMMISSION

Industry participants reached consensus to have NANPA file the results of the 561 and 954 NPA relief meeting with the Florida Public Service Commission. Alternatives # 1, a distributed overlay for the 561 NPA will be submitted for consideration as well as Alternative # 1, also a distributed overlay for the 954 NPA. The industry also came to consensus to request the Florida Public Service Commission consider both relief plans in the same time frame to minimize the time required for approval.

CONFERENCE CALL TO APPROVE MINUTES

It was the consensus of the industry participants to convene via conference call to approve the meeting notes and the draft filing of the 561 & 954 NPA relief planning meeting on June 21, 1999 at 10:00 a.m. Eastern. The draft filing and meeting minutes will be distributed by June 15, 1999. Thirty ports have been reserved for the conference call. Dial Information: (612) 335-3420 (access code 6388*); Host: Pamela Kenworthy. The call is expected to last two hours.

Attendees – 561/954 NPAs Industry Relief Planning Meeting

| <u>NAME</u> | <u>COMPANY</u> | <u>PHONE</u> | <u>FAX</u> |
|-------------------|---------------------|--------------|--------------|
| Benson, Al | BellSouth | 904-350-3359 | 904-355-8210 |
| Brown, Bill | BellSouth Cellular | 404-249-0486 | 404-249-0453 |
| Cutting, John C. | FPSC | 850-413-6844 | 850-413-6845 |
| Eudy, Harriet | Alltel | 904-364-2517 | 904-364-2474 |
| Flaherty, Reva | BellSouth | 305-347-5405 | 305-577-3575 |
| Foley, Thomas C. | Sprint | 407-889-6168 | 407-884-1919 |
| Fordham, Lee | FPSC | 850-413-6226 | 850-413-6227 |
| Glover, Joanne | BST | 904-350-3743 | 904-350-4150 |
| Green, Barbara | Sprint | 407-889-1330 | 407-884-1978 |
| Greer, Stan | BellSouth | 850-224-5139 | 850-222-8640 |
| Hartsfield, Don | Arrow Comms./ITS | 561-597-2827 | 561-597-2115 |
| Hatch, Alice | Omnipoint | 954-457-5744 | 954-457-5705 |
| Henderson, Anne | AT&T | 404-810-8913 | 404-810-6422 |
| Hiltz, Cara | Hyperion Comm. | 412-220-5603 | 412-220-5164 |
| Hunter, Dena | Media One | 303-705-5145 | 303-790-1094 |
| Ileri, Levent | FPSC | 850-413-6562 | 850-413-6563 |
| Jackson, Lester | Allsafe | 904-268-1111 | 904-268-4504 |
| Jardon, Mario | BellSouth Mobility | 561-995-3583 | 561-988-2729 |
| Kenworthy, Pamela | NANPA | 973-267-7812 | 973-267-7921 |
| Khazraee, Sandy | Sprint | 850-847-0173 | 850-878-0777 |
| Kinlen, Charlene | BellSouth | 561-468-5540 | 561-464-4137 |
| Lee, David | Allsafe Paging | 904-268-1111 | 904-268-4504 |
| Lewis, Charles M. | BellSouth | 404-927-2047 | 404-873-0432 |
| Lewis, Charles W. | Nextlink | 305-626-2808 | 305-626-9602 |
| Lunceford, Gene | BellSouth | 205-321-2013 | 205-321-4754 |
| Martin, Michael | Aerial Comms. | 813-243-3217 | 813-243-1906 |
| McCullough, Doug | BST | 205-977-5069 | 205-977-7877 |
| Milby, Wayne | NANPA | 804-795-5919 | 804-795-5514 |
| Milchuck, Kim | Hyperion Comm. | 814-260-6901 | 814-260-6867 |
| Nobles, Deborah | Northeast FL Tel. | 904-259-0639 | 904-259-7722 |
| Packer, Howard | BellSouth Mobility | 954-850-6400 | 561-995-3335 |
| Phillips, Bubba | AT&T Long Dist. | 770-785-5773 | 770-929-4348 |
| Queenin, Larry | BellSouth | 954-742-1389 | 954-746-0862 |
| Reuter, Larry | United States Cell. | 352-665-4332 | 352-665-4492 |
| Sawyer, Bill | BellSouth | 904-350-4541 | 904-355-8210 |
| Serenci, John | BellSouth | 954-928-4710 | 954-772-5105 |
| Smith, Dana | PrimeCo | 817-258-1036 | 817-258-1805 |

Attendees – 561/954 NPAs Industry Relief Planning Meeting (continued)

| <u>NAME</u> | <u>COMPANY</u> | <u>PHONE</u> | <u>FAX</u> |
|---------------------|--------------------|--------------|--------------|
| Snider, Vicki | BST Infrastructure | 954-928-4740 | 954-772-5105 |
| Stephenson, Suzenne | BellSouth Mobility | 407-771-1311 | 407-805-8914 |
| Van Leer, Dave | BellSouth | 904-350-2167 | 904-358-1060 |
| Watson, Dana | PrimeCo | 817-258-1270 | 817-258-1243 |
| Weeks, Rick | BellSouth | 954-928-4737 | 954-492-1752 |
| Williams, Frederick | MCI WorldCom | 972-656-1876 | 972-656-5022 |
| Willis, Bettye | Alltel Comms. | 501-905-5692 | 501-905-5679 |

561 & 954 (FLORIDA) NPA RELIEF INDUSTRY MEETING
Wednesday, May 19, 1999

Sheraton Oceanfront
3200 N. Ocean Drive
Singer Island, Florida 33404
(561) 842-6171

- 8:30 Welcome and Introductions
- 8:35 NANPA's Role and Responsibilities
- 8:40 Minutes and "Statements For The Record"
- 8:45 Industry Guidelines
- 9:15 Review Code Assignment History
- 9:30 Review Initial Planning Document For 561
- 10:15 Additional Alternatives from Industry for 561
- 10:30 BREAK
- 10:45 Elimination of Alternatives for 561
- 11:30 Consensus on Implementation Intervals for 561
- 12:00 Consensus on Relief Alternative for 561
- 12:15 Consensus on Dialing Plan // Industry Commitment for Test Number
- 12:30 LUNCH (On Your Own)
- 1:30 Review Initial Planning Document for 954
- 2:15 Additional Alternatives from Industry for 954
- 2:30 Elimination of Alternatives for 954
- 3:15 BREAK
- 3:30 Consensus on Implementation Intervals 954
- 4:00 Consensus On Relief Alternative for 954
- 4:15 Consensus on Dialing Plan // Industry Commitment for Test Number
- 4:30 Consensus on NANPA Filing Industry Efforts With Commission
- 4:40 Statements for the Record / Set Date For Conference Call To Approve Minutes
- 4:45 Complete NANPA Survey
- 5:00 Adjourn

General NPA Relief Alternative Attributes

Splits

Overlays

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Future splits will reduce the geographic size of the area code.
- Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.
- Geographic splits permit 7 digit local dialing within the smaller home NPA. However local dialing across the NPA boundary should become 10 digit.

General Attributes of Overlays

- With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
 - An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
 - An overlay will require customers to dial 10 Digits or 1 + 10 digits for all calls within the geographic area.
-
-

Overlays

General Attributes of Concentrated Growth Overlays

- **Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay.**
 - **It is very difficult to predict the exhaust of the non-overlay area of the concentrated overlay.**
 - **Customer confusion pertaining to dialing for a concentrated overlay could exist.**
 - **In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.**
 - **A concentrated growth overlay minimizes implementation of 10 digit dialing for customers.**
 - **Normally, no existing customers will be required to change their telephone number.**
-
-

Initial Planning Document
For Relief of Florida: 561 NPA and 954 NPA

North American Numbering Plan Administration

561 NPA Relief Alternatives

Distributed Overlay Alternative

Alternative # 1

A new NPA code would be assigned to the same geographic area as the existing 561 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 561 NPA all code assignments will be made in the overlay area code.

Total codes at Exhaust = 751

Area code life in years = * 8.8 to 17.6

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 dialing would be permitted.

Alternative # 2

West Palm Beach Plan

Split boundary line runs along rate center boundaries to the northeast of West Palm Beach and includes West Palm Beach.

Area A

Total codes at Exhaust = 360

Area code life in years = * 9.5 to 19.0

Area B

Total codes at Exhaust = 391

Area code life in years = * 8.1 to 16.2

Alternative # 3

Tri-Beach Area Plan

Split boundary line includes West Palm Beach, Boynton Beach and Delray Beach in one geographic area.

Area A

Total codes at Exhaust = 390

Area code life in years = * 8.1 to 16.3

Area B

Total codes at Exhaust = 361

Area code life in years = * 9.5 to 19.0

* Area code life in years span assumes that code growth continues at 2Q 1999 – 4Q 2001 and then code growth is reduced by 50% beyond 4Q 2001.

954 NPA Relief Alternatives**Overlay Alternative****Alternative # 1**

A new NPA code would be assigned to the same geographic area as the existing 954 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 954 NPA all code assignments will be made in the overlay area code.

Total codes at Exhaust = 764

Area code life in years = * 9.5 to 19.0

Split Alternative

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

Alternative # 2**Ft. Lauderdale East Plan**

In order to create a Split alternative that would provide equal lives on either side of the boundary line, the Ft. Lauderdale rate center would be split to accommodate the total number of assigned codes and the total codes at exhaust. The boundary line drawn is approximate. Further analysis of the exact boundary line is needed.

Area A

Total codes at Exhaust = 376

Area code life in years = * 9.9 to 19.8

Area B

Total codes at Exhaust = 388

Area code life in years = * 9.2 to 18.3

* Area code life in years span assumes that code growth continues at 2Q 1999 – 4Q 2001 and then code growth is reduced by 50% beyond 4Q 2001.

FLORIDA 561 NPA ALTERNATIVES

PROJECTED LIFE OF RELIEF ALTERNATIVES IN YEARS

| <u>Alternative</u> | <u>Assumption #1</u> | | <u>Assumption #2</u> | |
|--------------------|----------------------|---------------|----------------------|---------------|
| | <u>Area A</u> | <u>Area B</u> | <u>Area A</u> | <u>Area B</u> |
| #1 | 8.8 | | 17.6 | |
| #2 | 9.5 | 8.1 | 19.0 | 16.2 |
| #3 | 8.1 | 9.5 | 16.3 | 19.0 |

FLORIDA 954 NPA ALTERNATIVES

| <u>Alternative</u> | <u>Assumption #1</u> | | <u>Assumption #2</u> | |
|--------------------|----------------------|---------------|----------------------|---------------|
| | <u>Area A</u> | <u>Area B</u> | <u>Area A</u> | <u>Area B</u> |
| #1 | 9.5 | | | 19.0 |
| #2 | 9.0 | 9.2 | 19.8 | 18.3 |

Assumption # 1 - Code growth continues at 2Q 1999 to 4Q 2001 levels
 Assumption # 2 - Code growth reduced by 50%
 beyond 4Q 2001

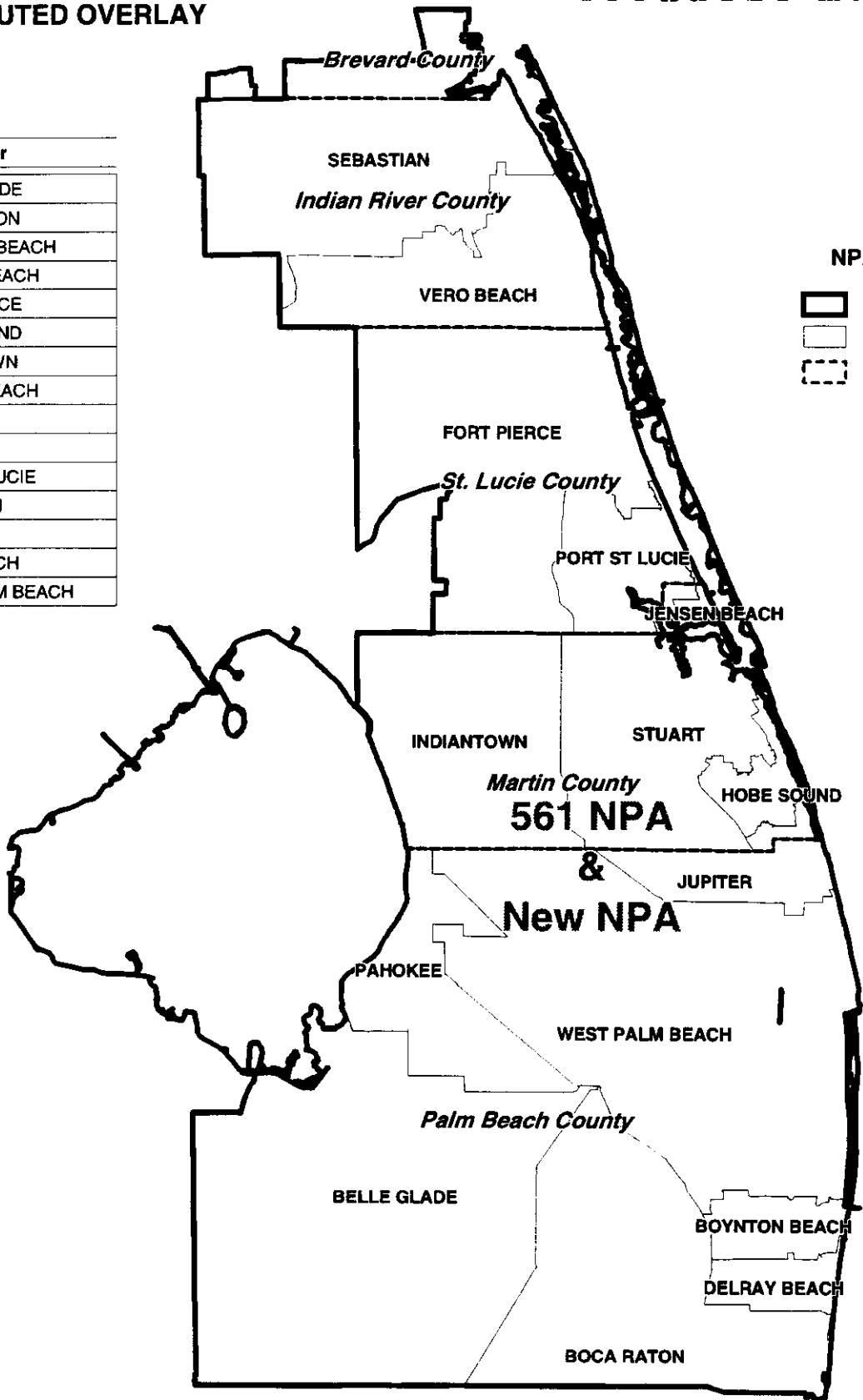
**NPA 561 Rate Center Map
 Alternative # 1
 DISTRIBUTED OVERLAY**



| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

NPA 561 Legend

| | |
|--|-----------------------|
| | NPA Boundaries |
| | Rate Center Boudaries |
| | County Boundaries |



| ALTERNATIVE | PROJECTED_LIVES |
|---------------------|-------------------|
| ALT #1 | PROJECTED LIVES |
| DISTRIBUTED OVERLAY | 8.8 to 17.6 YEARS |

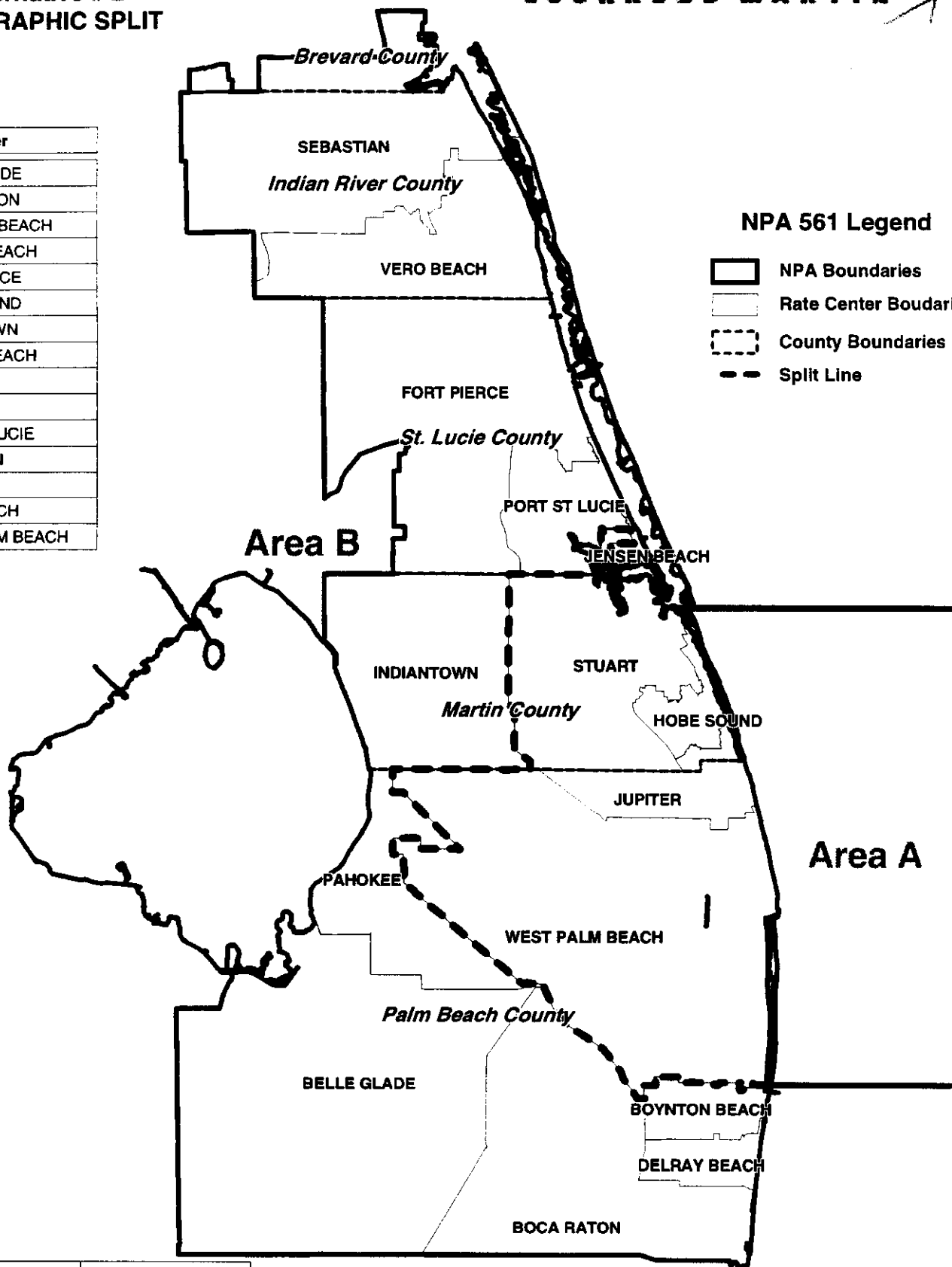
**NPA 561 Rate Center Map
 Alternative # 2
 GEOGRAPHIC SPLIT**



| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

NPA 561 Legend

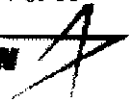
- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line



| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT #2 | PROJECTED LIVES |
| AREA A | 9.5 to 19.0 Years |
| AREA B | 8.1 to 16.2 Years |

**NPA 561 Rate Center Map
 Alternative # 3
 GEOGRAPHIC SPLIT**

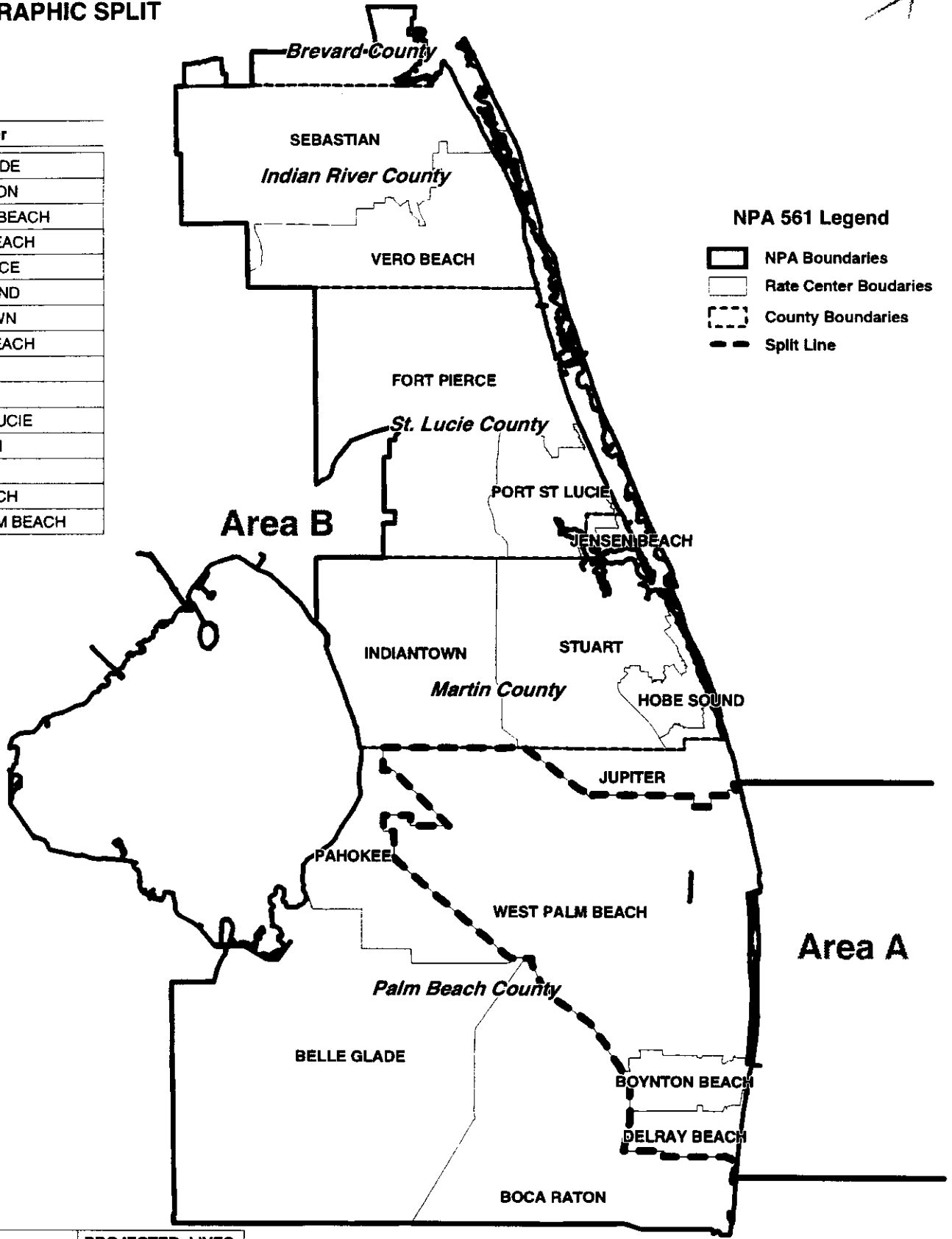
LOCKHEED MARTIN



| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

NPA 561 Legend

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line



| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT #3 | PROJECTED LIVES |
| AREA A | 8.1 to 16.3 Years |
| AREA B | 9.5 to 19.0 Years |

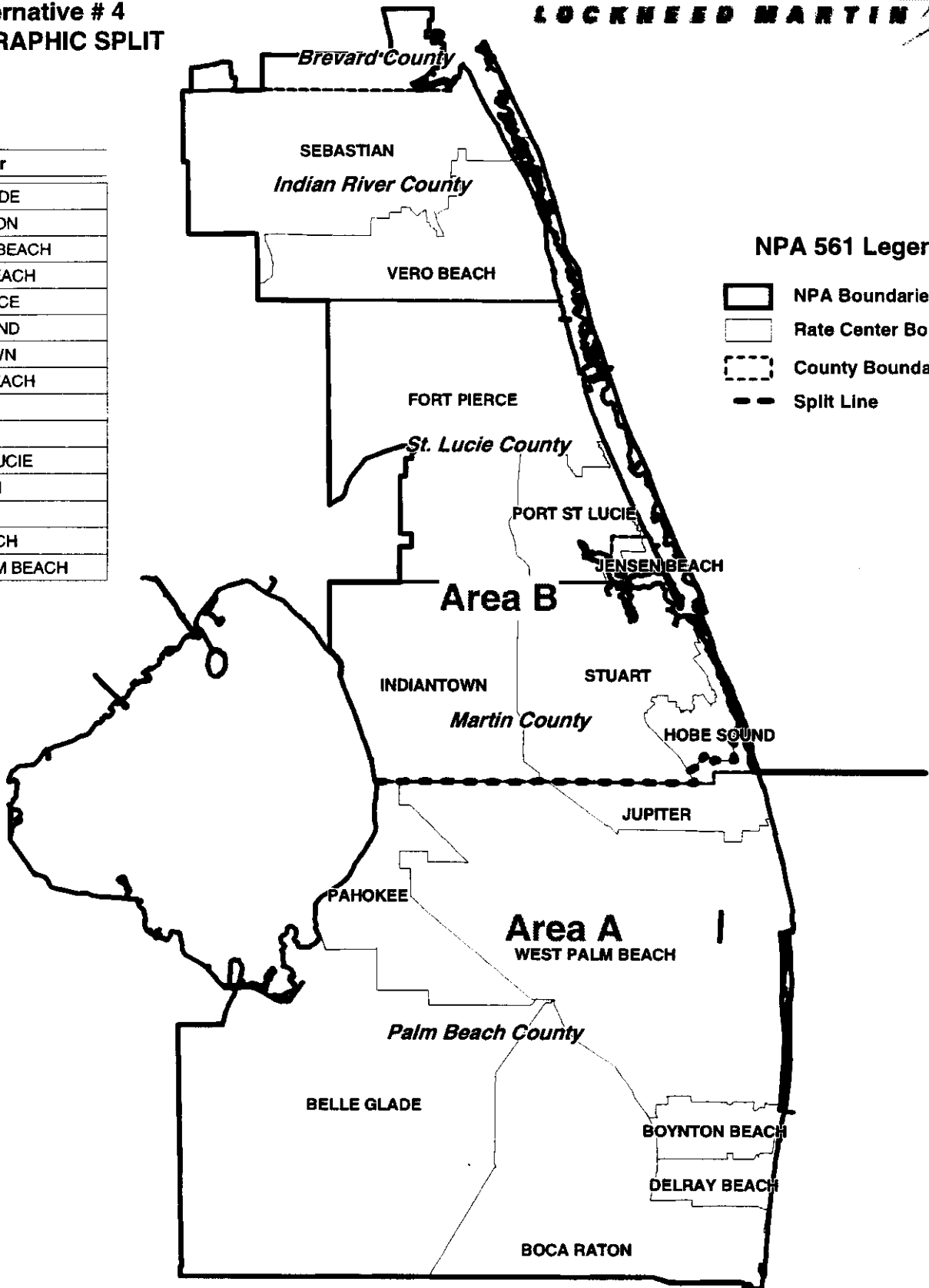


**NPA 561 Rate Center Map
 Alternative # 4
 GEOGRAPHIC SPLIT**

| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

NPA 561 Legend

- NPA Boundaries
- Rate Center Boudaries
- County Boundaries
- Split Line



| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-----------------|
| ALT #4 | PROJECTED LIVES |
| AREA A | 3.1 YEARS |
| AREA B | 24.6 YEARS |

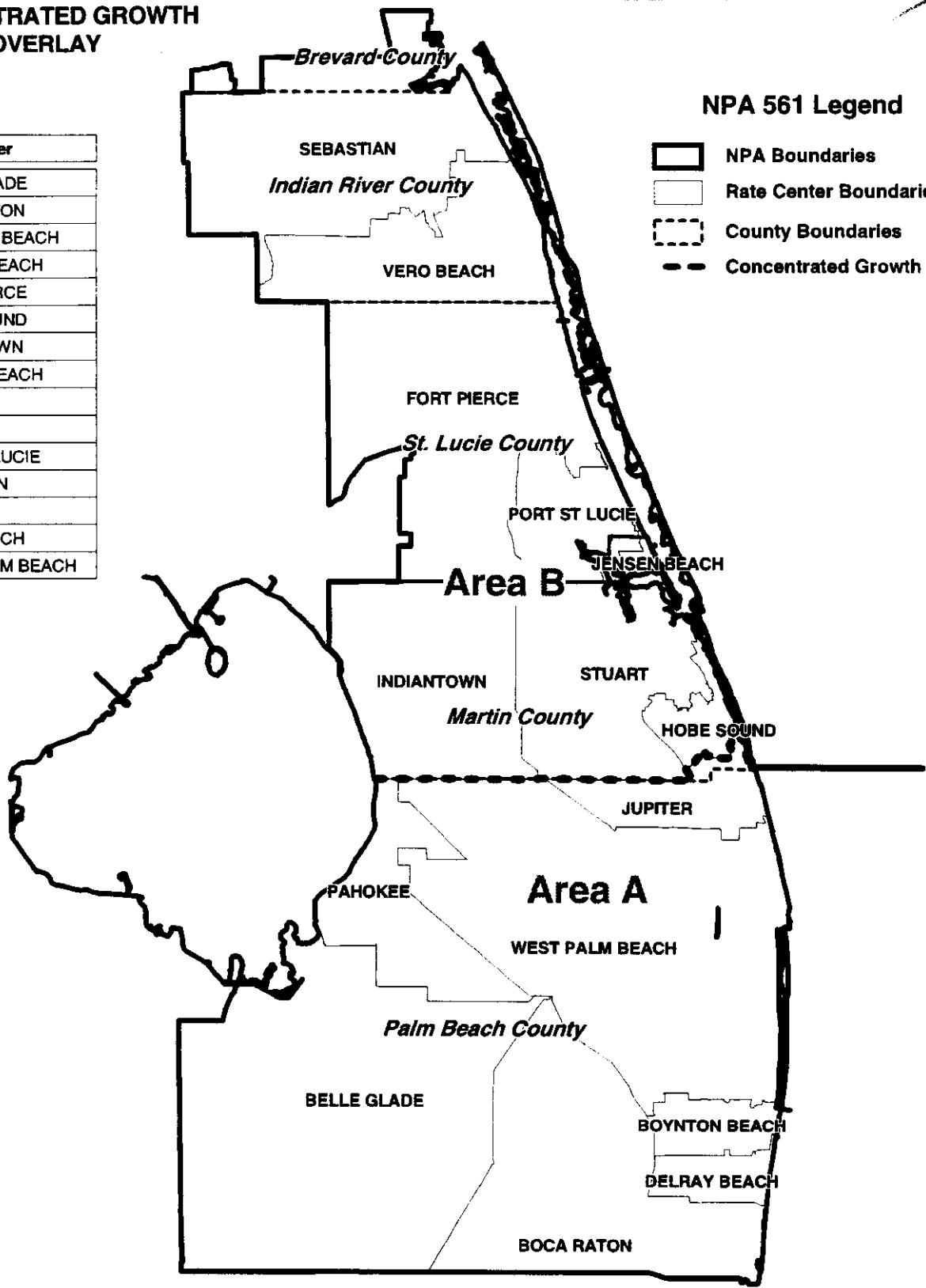
**NPA 561 Rate Center Map
 Alternative # 5
 CONCENTRATED GROWTH
 OVERLAY**



| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

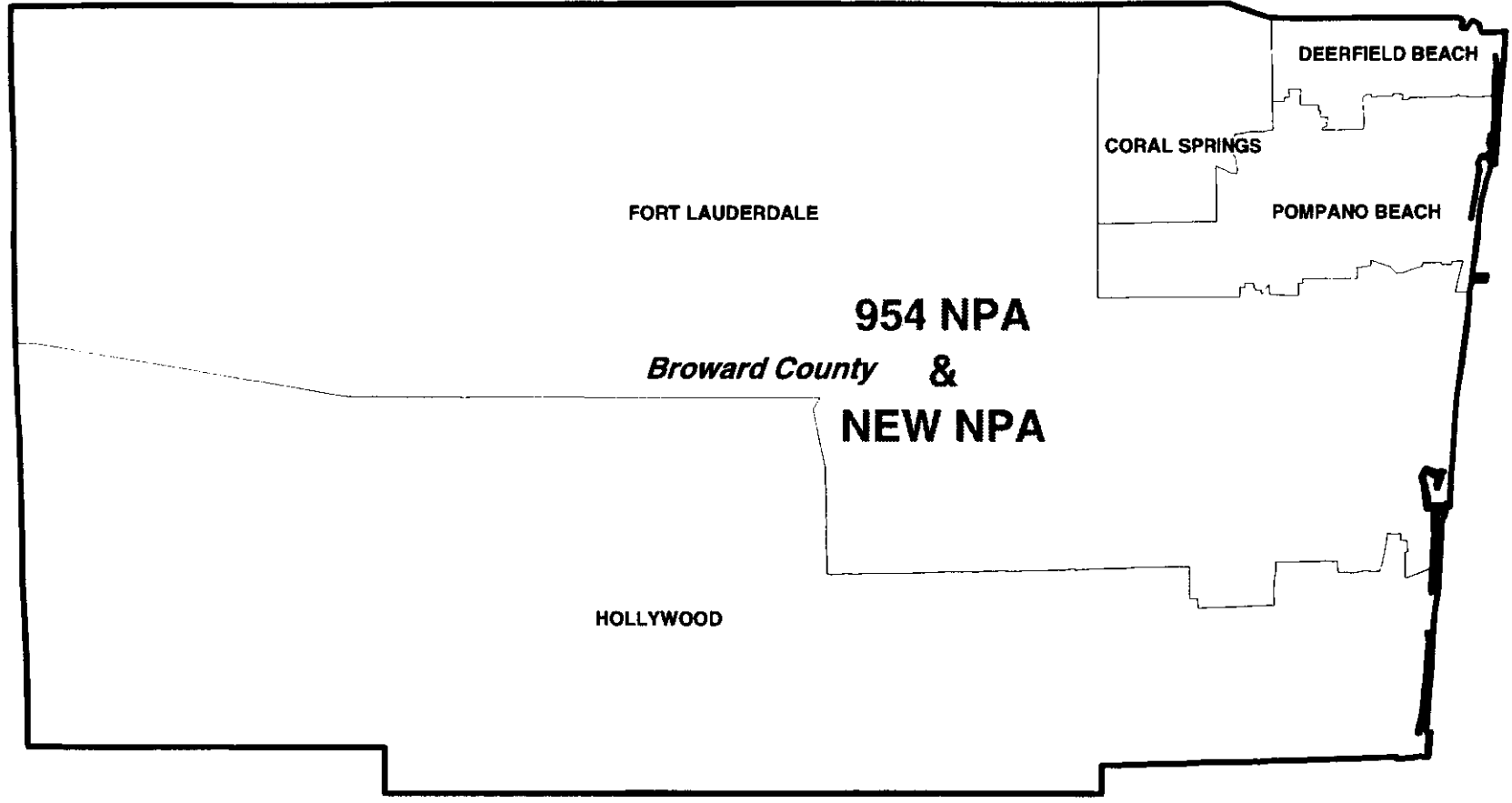
NPA 561 Legend

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Concentrated Growth Area





| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-----------------|
| ALT #5 | PROJECTED LIVES |
| AREA A | 2.0 YEARS |
| AREA B | 10.0 YEARS |

**NPA 954 Rate Center Map
 Alternative # 1
 DISTRIBUTED OVERLAY**



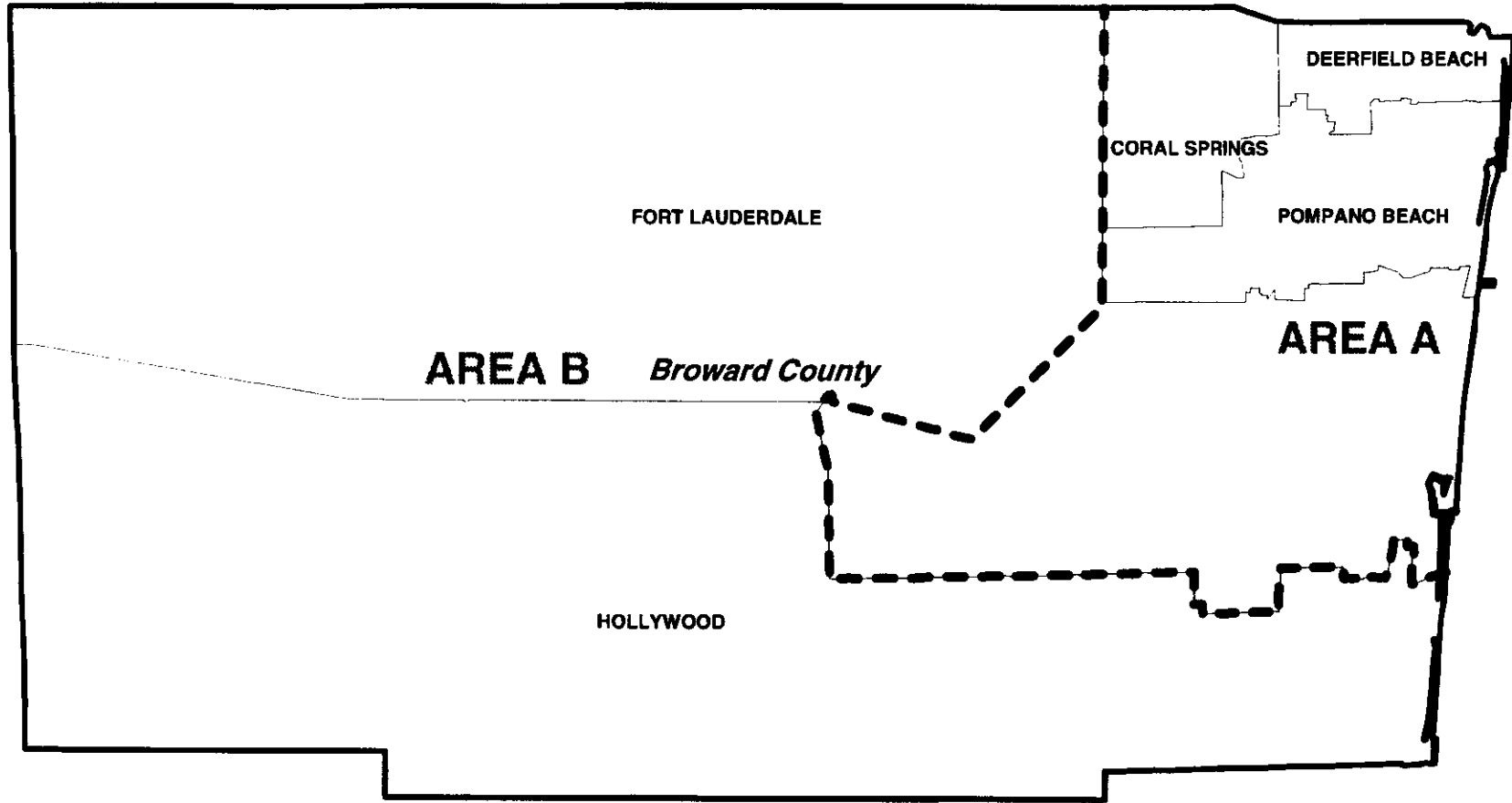
**NPA 954 Legend
 Includes City and Rate Center Boundaries**

-  NPA Boundaries
-  Rate Center Boundaries




| Rate_Center |
|-----------------|
| CORAL SPRINGS |
| DEERFIELD BEACH |
| HOLLYWOOD |
| POMPANO BEACH |
| FORT LAUDERDALE |

| ALTERNATIVE | PROJECTED_LIVES |
|---------------------|-------------------|
| ALT #1 | PROJECTED LIVES |
| DISTRIBUTED OVERLAY | 9.5 to 19.0 Years |

**NPA 954 Rate Center Map
 Alternative # 2
 GEOGRAPHIC SPLIT**



NPA 954 Legend
 Includes City and Rate Center Boundaries

-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

| Rate_Center |
|-----------------|
| CORAL SPRINGS |
| DEERFIELD BEACH |
| HOLLYWOOD |
| POMPANO BEACH |
| FORT LAUDERDALE |

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT #2 | PROJECTED LIVES |
| AREA A | 9.9 to 19.8 Years |
| AREA B | 9.2 to 18.3 Years |



OMNIPOINT COMMUNICATIONS
16 Wing Drive, Cedar Knolls, New Jersey 07927
973 290-2400 Fax: 973 290-2521

May 19, 1999

Mr. Wayne Milby
Senior NPA Relief Planner – Eastern Region
North American Number Planning Administrator
1133 15th St. NW
Washington, DC 20005

Re: Florida NPAs 561 & 954 Relief Planning

Dear Mr. Milby:

Omnipoint Communications MB Operations, LLC, (d/b/a Omnipoint Communications) is a leading Personal Communications Service ("PCS") licensee and service provider. It began offering PCS service in the West Palm Beach, Fort Lauderdale and Miami areas March, 1998; and currently provides advanced wireless communications services in much of New York, New Jersey, Connecticut, eastern Pennsylvania, Delaware, Massachusetts, New Hampshire, Rhode Island, South Florida, Michigan, Indiana and some service in Maine, Maryland and Ohio. Omnipoint Communications intends to offer similar services in the future in additional areas.

As you are aware, wireless carriers have a proven record of employing efficient allocation methods and high utilization rates of telephone numbers. For that reason, Omnipoint Communications hereby respectfully requests that the Florida Public Service Commission (hereinafter "Florida PSC"), and the Florida telecommunications industry reconsider technology-specific or wireless-only overlays as a means of optimizing number resources.

In the past, Omnipoint Communications has advocated to both the individual state utility commissions and the Federal Communications Commission (hereinafter "FCC"), for the employment of expanded overlays as a means of addressing area code relief. Expanded overlays, although technology-neutral, can be most readily utilized by wireless carriers. Unfortunately, these overlays are designed to be multi-state, leading to jurisdictional implementation issues.

Most recently, several states, including California, Massachusetts and Connecticut, have recommended that the FCC grant authority to the individual states to investigate and implement a wireless-only overlay, in spite of the requirements adopted under 47 C.F.R. §52.9¹. Omnipoint

¹ The requirements set forth under 47 C.F.R. §52.9 state generally that access to telephone numbering resources must ensure that telecommunications numbers are made available on an equitable basis, the administration of telecommunications numbers

Communications hereby requests the Florida PSC join these states in requesting such relief. Wireless-only overlays are worth reconsidering because they promise an immediate and efficient solution for the numbering scarcity suffered by wireless carriers, which form a significant and rapidly growing portion of the industry and which are largely blameless for the problems facing the Florida PSC. Omnipoint Communications will support such a Petition to the FCC.

Omnipoint Communications therefore supports a wireless-only area code for the State of Florida and requests that the Florida PSC request a waiver from the FCC to modify its 1995 ruling against permitting such overlays, which has since been codified in Section § 52.19(c)(3)(i) of the Commission's Rules. See Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, Declaratory Ruling and Order, 10 FCC Rcd 4596 (1995) ("Ameritech Order"); see also 47 C.F.R. § 52.19(c)(3)(i). As a wireless carrier, Omnipoint Communications asserts that service-specific or technology-specific overlays are no more discriminatory, inherently anti-competitive, or harmful to consumers than the current rate center methodology utilized by local exchange carriers. The Ameritech Order sought to protect wireless carriers at a time when the full record on efficient wireless industry number utilization was not known. Now that the FCC has recognized the full record on wireless number utilization efficiencies in its most recent LNP Forbearance Order, (See In the Matter of Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile radio Services Number Portability Obligations and Telephone Number Portability Memorandum Opinion and Order, WT Docket No. 98-229, FCC 99-19 (February 9, 1999)), it is appropriate that the FCC revisit this methodology because it clearly removes the industry's most efficient carriers from the current crisis in Florida.

Omnipoint Communications recommends that the Florida PSC consider the following parameters for a wireless-only overlay in an effort to address area code exhaust and number resource conservation: (a) mandatory assignment of a new overlay code to all new wireless customers, paging customers and wireline carriers; (b) mandatory requirement that all new wireless handsets be assigned to the new overlay code; and (c) agree that mandatory ten-digit dialing will not be required other than for dialing between NPAs. These proposed guidelines would ensure that a high utilization is maintained, would ease the demands placed on existing area codes by the rapid expansion of wireless services, and would ensure that, eventually, all NXXs within an old area code would be returned in a manageable fashion, thereby renewing the life of existing NPAs. Such guidelines would alleviate the discrimination concerns voiced by other wireless carriers against wireless-only overlays.

Most importantly, a wireless-only overlay would benefit competition by allowing rapidly growing wireless carriers superior access to telephone numbers than either of the current NPA

shall, in addition to the specific requirements set forth in this subpart: (1) Facilitate entry into the telecommunications market place by making telecommunications numbering resources available on a efficient, timely basis to telecommunications carriers; (2) Not unduly favor of disfavor any particular telecommunications industry segment or group of telecommunications customers; and (3) Not unduly favor one telecommunications technology over another.

May 19, 1999

Florida NPAs 561 & 954 Relief Planning Letter

relief methods. In a practice carried over from serving traditional wireline carriers, the current assignment guidelines assign NXX blocks to wireless carriers on the basis of landline rate centers. Wireless technology is not tied to traditional rate centers and their numbering parameters, however. It is Omnipoint Communication's belief that this applying rate centers to wireless services is therefore inefficient. Moreover, the competition between wireless and wireline carriers for scarce NXX resources on a rate-center-by-rate-centers basis unnecessarily starves wireless carriers of the numbers they need to provide service in a competitive market. Because wireless carriers are able to spread a single NXX block over a larger service area, and because they are thereby capable of using their allocated NXX blocks more efficiently, a wireless-only overlay promises to free wireless carriers from the current congestion.

Respectfully submitted,

Michele K. Thomas

Michele K. Thomas

Manager - Legal & Regulatory Affairs

cc: Ronald R. Conners, Director, NANPA

OMNIPOINT COMMUNICATIONS
COMMENTS
Florida NPAs 561 & 954 Relief Planning Meeting
May 19, 1999

OMNIPOINT COMMUNICATIONS MB OPERATIONS, LLC, IS A LEADING PERSONAL COMMUNICATIONS SERVICE LICENSEE AND SERVICE PROVIDER. IT BEGAN OFFERING PCS SERVICE IN THE WEST PALM BEACH, FORT LAUDERDALE AND MIAMI AREAS MARCH, 1998; AND CURRENTLY PROVIDES ADVANCED WIRELESS COMMUNICATIONS SERVICES IN MUCH OF NEW YORK, NEW JERSEY, CONNECTICUT, EASTERN PENNSYLVANIA, DELAWARE, MASSACHUSETTS, NEW HAMPSHIRE, RHODE ISLAND, SOUTH FLORIDA, MICHIGAN, INDIANA AND SOME SERVICE IN MAINE, MARYLAND AND OHIO. OMNIPOINT COMMUNICATIONS INTENDS TO OFFER SIMILAR SERVICES IN THE FUTURE IN ADDITIONAL AREAS.

AS YOU ARE AWARE, WIRELESS CARRIERS HAVE A PROVEN RECORD OF EMPLOYING EFFICIENT ALLOCATION METHODS AND HIGH UTILIZATION RATES OF TELEPHONE NUMBERS. FOR THAT REASON, OMNIPOINT COMMUNICATIONS HEREBY RESPECTFULLY REQUESTS THAT THE FLORIDA PUBLIC SERVICE COMMISSION, AND THE FLORIDA TELECOMMUNICATIONS INDUSTRY RECONSIDER TECHNOLOGY-SPECIFIC OR WIRELESS-ONLY OVERLAYS AS A MEANS OF OPTIMIZING NUMBER RESOURCES.

IN THE PAST, OMNIPOINT COMMUNICATIONS HAS ADVOCATED TO BOTH THE INDIVIDUAL STATE UTILITY COMMISSIONS AND THE FEDERAL COMMUNICATIONS COMMISSION, FOR THE EMPLOYMENT OF EXPANDED OVERLAYS AS A MEANS OF ADDRESSING AREA CODE RELIEF. EXPANDED OVERLAYS, ALTHOUGH TECHNOLOGY-NEUTRAL, CAN BE MOST READILY UTILIZED BY WIRELESS CARRIERS. UNFORTUNATELY, THESE OVERLAYS ARE DESIGNED TO BE MULTI-STATE, LEADING TO JURISDICTIONAL IMPLEMENTATION ISSUES.

MOST RECENTLY, SEVERAL STATES, INCLUDING CALIFORNIA, MASSACHUSETTS AND CONNECTICUT, HAVE RECOMMENDED THAT THE FCC GRANT AUTHORITY TO THE INDIVIDUAL STATES TO INVESTIGATE AND IMPLEMENT A WIRELESS-ONLY OVERLAY, IN SPITE OF THE REQUIREMENTS ADOPTED UNDER 47 C.F.R. PARAGRAPH 52.9. OMNIPOINT COMMUNICATIONS HEREBY REQUESTS THE FLORIDA PUBLIC SERVICE COMMISSION JOIN THESE STATES IN REQUESTING SUCH RELIEF. WIRELESS-ONLY OVERLAYS ARE WORTH RECONSIDERING BECAUSE THEY PROMISE AN IMMEDIATE AND EFFICIENT SOLUTION FOR THE NUMBERING SCARCITY SUFFERED BY WIRELESS CARRIERS, WHICH FORM A SIGNIFICANT AND RAPIDLY GROWING PORTION OF THE INDUSTRY AND WHICH ARE LARGELY BLAMELESS FOR THE PROBLEMS FACING THE FLORIDA PUBLIC SERVICE COMMISSION. OMNIPOINT COMMUNICATIONS WILL SUPPORT SUCH A PETITION TO THE FCC.

OMNIPOINT COMMUNICATIONS THEREFORE SUPPORTS A WIRELESS-ONLY AREA CODE FOR THE STATE OF FLORIDA AND REQUESTS THAT THE FLORIDA PUBLIC

SERVICE COMMISSION REQUEST A WAIVER FROM THE FCC TO MODIFY ITS 1995 RULING AGAINST PERMITTING SUCH OVERLAYS, WHICH HAS SINCE BEEN CODIFIED IN SECTION PARAGRAPH 52.19 OF THE COMMISSION'S RULES. AS A WIRELESS CARRIER, OMNIPOINT COMMUNICATIONS ASSERTS THAT SERVICE-SPECIFIC OR TECHNOLOGY-SPECIFIC OVERLAYS ARE NO MORE DISCRIMINATORY, INHERENTLY ANTI-COMPETITIVE, OR HARMFUL TO CONSUMERS THAN THE CURRENT RATE CENTER METHODOLOGY UTILIZED BY LOCAL EXCHANGE CARRIERS. THE AMERITECH ORDER SOUGHT TO PROTECT WIRELESS CARRIERS AT A TIME WHEN THE FULL RECORD ON EFFICIENT WIRELESS INDUSTRY NUMBER UTILIZATION WAS NOT KNOWN. NOW THAT THE FCC HAS RECOGNIZED THE FULL RECORD ON WIRELESS NUMBER UTILIZATION EFFICIENCIES IN ITS MOST RECENT LNP FORBEARANCE ORDER, IT IS APPROPRIATE THAT THE FCC REVISIT THIS METHODOLOGY BECAUSE IT CLEARLY REMOVES THE INDUSTRY'S MOST EFFICIENT CARRIERS FROM THE CURRENT CRISIS IN FLORIDA.

OMNIPOINT COMMUNICATIONS RECOMMENDS THAT THE FLORIDA PUBLIC SERVICE COMMISSION CONSIDER THE FOLLOWING PARAMETERS FOR A WIRELESS-ONLY OVERLAY IN AN EFFORT TO ADDRESS AREA CODE EXHAUST AND NUMBER RESOURCE CONSERVATION: (A) MANDATORY ASSIGNMENT OF A NEW OVERLAY CODE TO ALL NEW WIRELESS CUSTOMERS, PAGING CUSTOMERS AND WIRELINE CARRIERS; (B) MANDATORY REQUIREMENT THAT ALL NEW WIRELESS HANDSETS BE ASSIGNED TO THE NEW OVERLAY CODE; AND (C) AGREE THAT MANDATORY TEN-DIGIT DIALING WILL NOT BE REQUIRED OTHER THAN FOR DIALING BETWEEN NPAs.

THESE PROPOSED GUIDELINES WOULD ENSURE THAT A HIGH UTILIZATION IS MAINTAINED, WOULD EASE THE DEMANDS PLACED ON EXISTING AREA CODES BY THE RAPID EXPANSION OF WIRELESS SERVICES, AND WOULD ENSURE THAT, EVENTUALLY, ALL NXXs WITHIN AN OLD AREA CODE WOULD BE RETURNED IN A MANAGEABLE FASHION, THEREBY RENEWING THE LIFE OF EXISTING NPAs. SUCH GUIDELINES WOULD ALLEVIATE THE DISCRIMINATION CONCERNS VOICED BY OTHER WIRELESS CARRIERS AGAINST WIRELESS-ONLY OVERLAYS.

MOST IMPORTANTLY, A WIRELESS-ONLY OVERLAY WOULD BENEFIT COMPETITION BY ALLOWING RAPIDLY GROWING WIRELESS CARRIERS SUPERIOR ACCESS TO TELEPHONE NUMBERS THAN EITHER OF THE CURRENT NPA RELIEF METHODS. IN A PRACTICE CARRIED OVER FROM SERVING TRADITIONAL WIRELINE CARRIERS, THE CURRENT ASSIGNMENT GUIDELINES ASSIGN NXX BLOCKS TO WIRELESS CARRIERS ON THE BASIS OF LANDLINE RATE CENTERS. WIRELESS TECHNOLOGY IS NOT TIED TO TRADITIONAL RATE CENTERS AND THEIR NUMBERING PARAMETERS, HOWEVER. IT IS OMNIPPOINT COMMUNICATION'S BELIEF THAT THIS APPLYING RATE CENTERS TO WIRELESS SERVICES IS THEREFORE INEFFICIENT. MOREOVER, THE COMPETITION BETWEEN WIRELESS AND WIRELINE CARRIERS FOR SCARCE NXX RESOURCES ON A RATE-CENTER-BY-RATE-CENTERS BASIS UNNECESSARILY STARVES WIRELESS CARRIERS OF THE NUMBERS THEY NEED TO PROVIDE SERVICE IN A COMPETITIVE MARKET. BECAUSE WIRELESS CARRIERS ARE ABLE TO SPREAD A SINGLE NXX BLOCK OVER A LARGER SERVICE AREA, AND BECAUSE THEY ARE THEREBY CAPABLE OF USING THEIR ALLOCATED NXX BLOCKS

MORE EFFICIENTLY, A WIRELESS-ONLY OVERLAY PROMISES TO FREE WIRELESS CARRIERS FROM THE CURRENT CONGESTION.

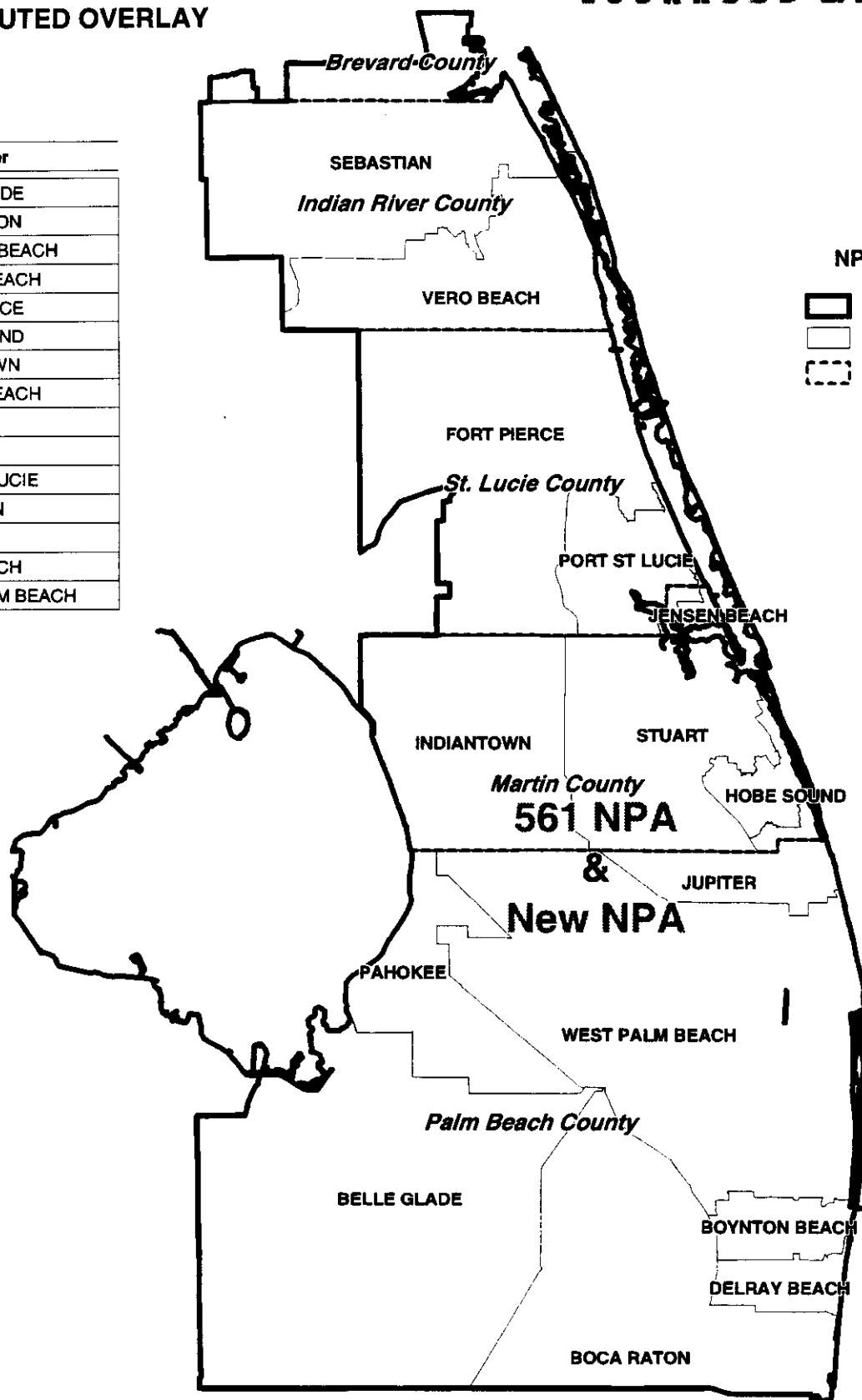
**NPA 561 Rate Center Map
Alternative # 1
DISTRIBUTED OVERLAY**



| Rate_Center |
|-----------------|
| BELLE GLADE |
| BOCA RATON |
| BOYNTON BEACH |
| DELRAY BEACH |
| FORT PIERCE |
| HOBE SOUND |
| INDIANTOWN |
| JENSEN BEACH |
| JUPITER |
| PAHOKEE |
| PORT ST LUCIE |
| SEBASTIAN |
| STUART |
| VERO BEACH |
| WEST PALM BEACH |

NPA 561 Legend

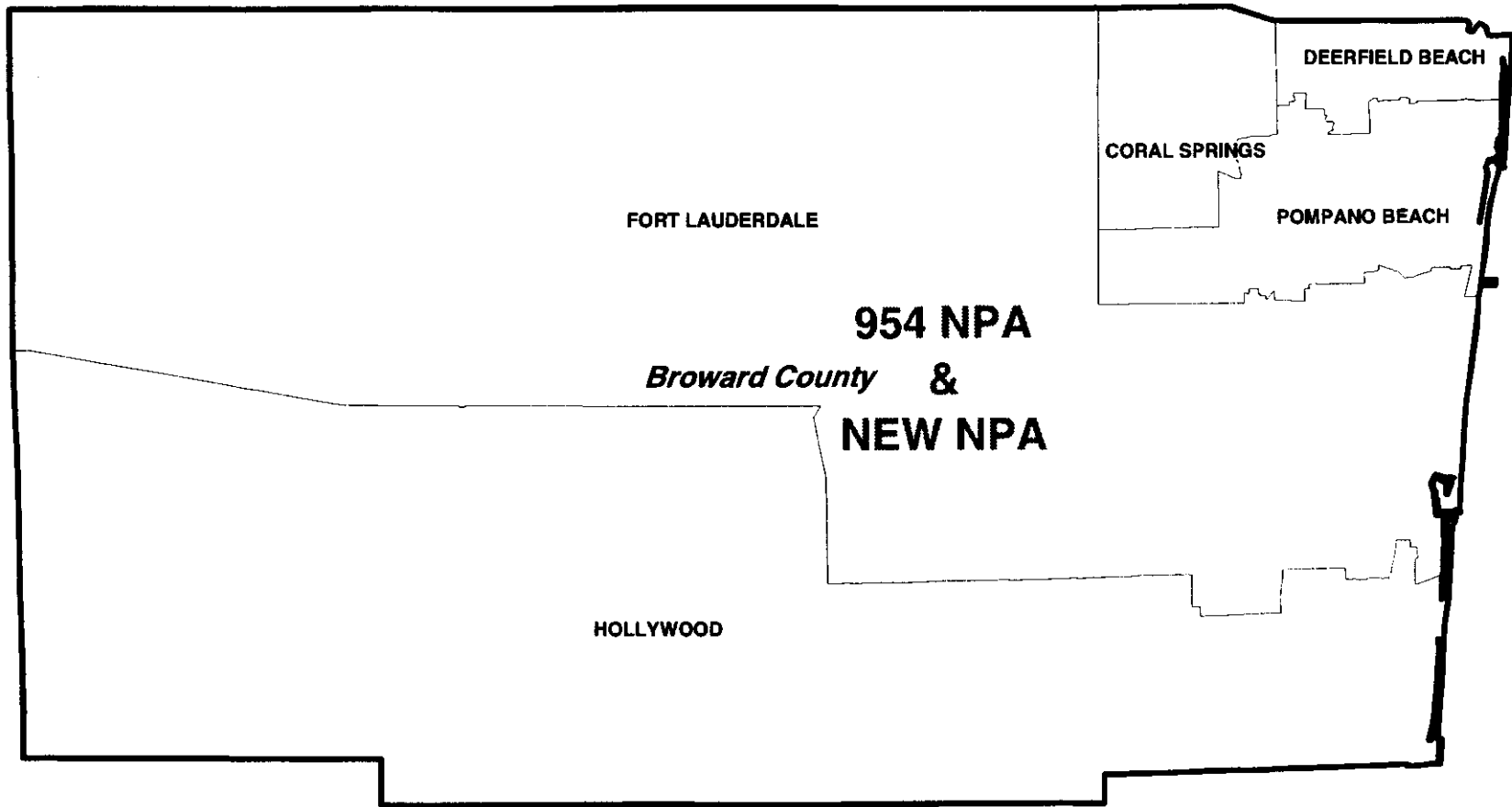
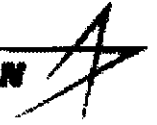
- NPA Boundaries
- Rate Center Boudaries
- County Boundaries





| ALTERNATIVE | PROJECTED LIVES |
|---------------------|-------------------|
| ALT #1 | PROJECTED LIVES |
| DISTRIBUTED OVERLAY | 8.8 to 17.6 YEARS |

**NPA 954 Rate Center Map
Alternative # 1
DISTRIBUTED OVERLAY**

LOCKHEED MARTIN



**NPA 954 Legend
Includes City and Rate Center Boundaries**

-  NPA Boundaries
-  Rate Center Boundaries

| Rate_Center |
|-----------------|
| CORAL SPRINGS |
| DEERFIELD BEACH |
| HOLLYWOOD |
| POMPANO BEACH |
| FORT LAUDERDALE |

| ALTERNATIVE | PROJECTED_LIVES |
|---------------------|-------------------|
| ALT #1 | PROJECTED LIVES |
| DISTRIBUTED OVERLAY | 9.5 to 19.0 Years |

Produced by CDS Business Mapping 4/19/99