

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

November 16, 1999

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

By Overnight Courier

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

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL, 990517-TL
Direct Testimony of Thomas C. Foley
on Behalf of Lockheed Martin IMS

Dear Ms. Bayo:

Pursuant to the November 1, 1999 Order Establishing Procedure issued by Chairman Joe Garcia in the above-referenced dockets, enclosed for filing are an original and 15 copies of the Direct Testimony of Thomas C. Foley on Behalf of Lockheed Martin IMS. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

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

Respectfully submitted,

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

Enclosures

- AFA _____
- APP _____
- CAF _____
- CMU llari
- CTR _____
- EAG _____
- LEG 1
- MAS 3tag
- OPC _____
- PAI _____
- SEC 1
- WAW _____
- OTH _____

RECEIVED & FILED

Man
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

14089 NOV 17 99

FPSC-RECORDS/REPORTING

MAIL ROOM
NOV 17 AM 10:20
SERVICES DIVISION
RECEIVED

dc-183091

**STATE OF FLORIDA
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

| | |
|---|----------------------|
| In re: Request for review of proposed numbering plan relief for the 305/786 area code – Dade County and Monroe County/Keys Region | Docket No. 990455-TL |
| In re: Request for review of proposed numbering plan relief for the 561 area code | Docket No. 990456-TL |
| In re: Request for review of proposed numbering plan relief for the 954 area code | Docket No. 990457-TL |
| In re: Request for review of proposed numbering plan relief for the 904 area code | Docket No. 990517-TL |

**DIRECT TESTIMONY OF THOMAS C. FOLEY
ON BEHALF OF
LOCKHEED MARTIN IMS**

November 16, 1999

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **THOMAS C. FOLEY**

5 **DOCKETS 990455-TL, 990456-TL, 990457-TL, and 990517-TL**

6
7 Q. Please state your name and business address.

8
9 A. My name is Thomas C. Foley. My business address is:

10
11 Lockheed Martin IMS - NANPA

12 1120 Vermont Avenue, N.W. Suite 550

13 Washington, DC 20005
14

15 Q. Please detail your educational background and professional experience in the
16 telecommunications industry.

17
18 A. I hold a Bachelor of Science Degree in Electrical Engineering from the University of Nebraska
19 - Lincoln and a Masters of Business Administration from Roosevelt University, Chicago. I
20 also have a Masters Certificate in Project Management from George Washington University.
21 I have attended numerous telecommunications industry schools and forums on engineering,
22 management, and project management.

24
25 I have been employed in the telecommunications industry for more than twenty-six years.
26

1 Currently I am employed as an NPA Relief Planner for Lockheed Martin IMS. Lockheed
2 Martin IMS performs the role of the neutral third party administrator of the North American
3 Numbering Plan (NANP). I have held this position since August 9, 1999.

4
5 Prior to joining NANP Administration (NANPA) I was employed by Sprint Corporation and its
6 predecessor companies.

7
8 I have held positions in Engineering, Strategic Market Planning, Technology Planning, and
9 Operations. I have held such positions as Manager of Budgets and Forecasting, District
10 Manager, and Project Manager. In my most recent previous position with Sprint, I managed
11 large, complex interdepartmental projects such as NPA relief activities. I have project
12 managed these activities for NPA relief since 1988, including the implementation of
13 interchangeable NPA/NXX codes.

14
15 I am a member of the faculty at the University of Phoenix where I teach mathematics,
16 statistics, project management, and general management courses at both the undergraduate
17 and graduate level.

18
19 Q. Have you ever appeared as a witness before the Florida Public Service Commission before?

20
21 A. Yes. Before I accepted my current position at Lockheed Martin IMS, I appeared as a witness
22 on behalf of Sprint in several proceedings before the Florida Public Service Commission
24 ("Commission"), most recently the 407/321 NPA and 941/863 NPA relief proceedings.

25
26 Q. What is the purpose of your testimony?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

A. This testimony is offered pursuant to the *NPA Relief Planning & Notification Guidelines (INC 97-0406-016 Aug. 30, 1999)*, the "Guidelines" and to explain NANPA's role in the relief process for the 305/786, 561, 954, and 904 NPAs and to these proceedings before the Commission.

Q. Please describe NANPA's role in these proceedings.

A. As I indicated before, NANPA is the neutral third party administrator of the NANP. NANPA convened a meeting of the industry for each of these NPAs to review the projected exhaust situation of NXX codes and to evaluate possible alternative means of providing relief. NANPA prepared and distributed an Initial Planning Document ("IPD") with proposed methods of relief prior to each meeting. The details of each meeting will be addressed later in my testimony.

At the meetings, industry participants reached consensus on relief alternatives to recommend to the Commission. NANPA and the industry use the Alliance for Telecommunications Industry Solutions ("ATIS") consensus process described in the Guidelines.

Following the meetings, NANPA filed with the Commission a petition on behalf of the telecommunications industry requesting approval of the relief plans recommended by the industry participants. These petitions for the 305/786, 561/954 and 904 NPAs were filed with the Commission on July 6, 1999; August 11, 1999; and August 16, 1999, respectively. The petitions, which contain the IPD and meeting minutes for each proceeding, are attached hereto as Exhibits TCF#1, TCF#2 and TCF#3.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
24
25
26

Q. Who comprises the telecommunications industry to which you refer?

A. The telecommunications industry consists of those current and prospective telecommunications carriers operating in, or considering operations in, the State of Florida at the time of the relief planning meetings.

Q. Addressing only the 305/786 NPA relief efforts, when was the industry meeting held and who was in attendance?

A. The telecommunications industry meeting was held June 23, 1999 in Key West, Florida. The list of invitees and attendees is included in Exhibit TCF#1.

Q. Were you in attendance at this meeting?

A. Yes, I was. At the time I was representing my former employer, Sprint.

Q. Please identify the relief alternatives considered at the June 23, 1999 305/786 NPA relief meeting.

A. There were four alternatives presented for consideration in the IPD and one additional alternative was offered for consideration at the meeting by a member of the industry.

Alternative #1 proposed an expanded overlay, from the existing 305/786-overlay area (Miami-Dade) to the Keys Area.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
24
25
26

Alternative #2 was similar to Alternative #1 but added an additional NPA code for the overlaid area to expand the life of the relief plan.

Alternatives #3 and #4 were geographic splits with an expanded overlay.

Alternative #5 was a geographic split, giving the Keys Area a separate NPA code and returning the 305 NPA NXX codes for assignment in the Miami-Dade area.

Q. How did the industry address the relief alternatives at the meeting?

A. The industry, by consensus, eliminated Alternative #2, which proposed an all services expanded overlay and the imposition of future additional overlay to cover the entire expanded area. This plan was eliminated because it required two separate forms of relief to be implemented with the second phase beginning approximately 3 years after the implementation of the first phase. The Alternative would commit the industry to a plan of action that could be rendered inappropriate by future events such as a Commission order on code conservation or the implementation of a nationwide conservation plan.

Alternative #3, a geographic split, was eliminated by consensus for several reasons. First, existing customers would be required to change their numbers. Second, seven-digit dialing would be preserved only in areas where it presently exists, typically in the adjacent Keys. Third, this alternative would take a longer period of time to implement in comparison to Alternative #1. Fourth, the permissive dialing period required for implementing a split

1 exceeds the estimated exhaust period. Fifth, business customers having to change their
2 numbers would incur additional expenses and possible loss of business.

3
4 Alternative #4 was also excluded by consensus because it required existing customers to
5 change their numbers. In addition, Alternative #4 requires that 297 NXX codes in the new
6 NPA be reserved for Monroe County. The industry was concerned that the reservation of
7 297 NXX codes may not support the estimated 12-year life of the new NPA. The industry
8 also had concern over the amount of time necessary to implement this plan, given the low
9 number of codes currently available in the Keys.

10
11 Alternative #5 was unanimously eliminated because, as a single geographic split, the
12 allocated NXX codes would be used inefficiently. Also, the lives of the resulting area codes
13 were not balanced.

14
15 Alternative #1 was accepted by consensus as the plan to recommend to the Commission as
16 the preferred means of relief for the 305/786 NPAs.

17
18 Q. How long will the recommended alternative provide relief to the 305/786 NPAs?

19
20 A. The life of Alternative #1 is projected to last 3.4 years to 6.8 years. The spread in years
21 assumes that an unknown means of NXX code conservation may extend the life of the NPA.

22
24 Q. Without the proposed relief, how long will the existing arrangement last for the Keys portion of
25 the 305 NPA?

26

1 A. With the current NXX code rationing established by the industry, the 305 NPA will exhaust
2 during the first quarter of 2001. The rationing plan allows for the assignment of only one NXX
3 code per month.

4

5 Q. Turning now to the relief activities for the 561 and 954 NPAs, when was the industry meeting
6 held and who was in attendance?

7

8 A. The industry meeting was held May 19,1999 in Singer Island, Florida. Relief plans for both the
9 954 and 561 NPAs were considered at this single meeting. The list of invitees and attendees
10 to this combined meeting is included in Exhibit TCF#2.

11

12 Q. Were you in attendance at this meeting?

13

14 A. Yes, I was. At the time, I was employed by Sprint.

15

16 Q. Please identify the relief alternatives considered at the May 19, 1999 relief meeting for the
17 561 NPA.

18

19 A. There were three alternatives presented for consideration in the original 561 NPA IPD
20 distributed to the industry. At the meeting, members of the industry offered for consideration
21 three additional relief alternatives.

22

24 Alternative #1 proposed a distributed overlay covering the same geographic area as the
25 current 561 NPA.

26

1 Alternative #2, the West Palm Beach Plan, was a geographic split with the proposed
2 boundary northeast of the West Palm Beach rate center.

3
4 Alternative #3, referred to as the Tri-Beach Area Plan, was a geographic split that included
5 West Palm Beach, Delray Beach, and Boynton Beach rate centers in an area separate from
6 the rest of the 561 NPA.

7
8 Alternative #4, proposed by a member of the industry, was a geographic split with the split
9 boundary line north of the Jupiter and West Palm Beach rate centers.

10
11 Alternative #5, proposed by a member of the industry, was a concentrated growth overlay
12 with the overlay portion covering the same area to the south of the split line detailed in
13 Alternative #4.

14
15 Alternative #6, proposed by a member of the industry at the meeting, was a statewide
16 wireless only overlay.

17
18 Q. How did the industry address the relief alternatives at the meeting?

19
20 A. The industry discussed the alternatives and reached consensus to eliminate Alternative #4
21 due to the unbalanced lives of the resulting NPAs (3.1 years and 24.6 years). Alternatives #2
22 and #3 were eliminated by consensus because the alternatives divided communities of
24 interest. Alternative #5, the concentrated growth overlay, was eliminated for several reasons:
25 (1) the unique dialing patterns necessary for concentrated growth overlays often cause
26 customer confusion; (2) special monitoring methods, not currently available, are required to

1 predict the exhaust of the preexisting area code outside of the concentrated overlay area;
2 and (3) the overlay area NPA must be identified as needing relief and a relief plan
3 implemented much earlier than with other forms of relief because a sufficient number of CO
4 Codes must be preserved to serve the area outside of the concentrated overlay area.

5

6 Alternative #6, the statewide wireless only overlay, was eliminated by consensus because a
7 service specific overlay violates FCC rules.

8

9 Alternative #1, the distributed overlay, was accepted by consensus as the alternative to
10 recommend to the Commission as the preferred means of relief for the 561 NPA..

11

12 Q. How long will the recommended alternative provide relief to the 561 NPA.

13

14 A. The life of Alternative #1, the distributed overlay, is projected to last 8.8 years to 17.6 years.
15 The spread in years assumes that an unknown means of NXX code conservation may extend
16 the life of the NPA.

17

18 Q. Without the proposed relief, how long will the existing arrangement last for the 561 NPA?

19

20 A. With the current NXX code rationing established by the industry, the 561 NPA will exhaust
21 during the third quarter of 2002. The rationing plan allows for the assignment of six NXX
22 codes per month.

24

25 Q. Turning now to 954 NPA relief activities, please identify the relief alternatives considered at
26 the May 19, 1999 relief meeting.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
24
25
26

A. There were two alternatives presented for consideration in the original 954 NPA IPD distributed to the industry. Industry members did not offer additional alternatives for consideration.

Alternative #1 proposed a distributed overlay covering the same geographic area as the current 954 NPA.

Alternative #2 was a geographic split with the proposed boundary west of the Coral Springs rate center and north of the Hollywood rate center. The proposed split line bisected the Fort Lauderdale rate center.

Q. How did the industry address the relief alternatives at the relief meeting?

A. The industry discussed the alternatives and reached consensus to eliminate Alternative #2 because the split boundary line divided a rate center and would therefore create confusing dialing patterns for end users. Also, the alternative would require some customers to have to change their seven-digit telephone numbers. The industry reached consensus to recommend Alternative #1, the distributed overlay, as the preferred means of relief for the 954 NPA.

Q. How long will the recommended alternative provide relief to the 954 NPA?

1 A. The life of Alternative #1, the distributed overlay, is projected to last 9.5 years to 19.0 years.
2 The spread in years assumes that an unknown means of NXX code conservation may extend
3 the life of the NPA.

4

5 Q. Without the proposed relief, how long will the existing arrangement last for the 954 NPA?

6

7 A. With the current NXX code rationing established by the industry, the 954 NPA will exhaust
8 during the second quarter of 2002. The rationing plan allows for the assignment of six NXX
9 codes per month.

10

11 Q. Moving along to the relief activities for the 904 NPA, when was the industry meeting held and
12 who was in attendance?

13

14 A. The industry meeting was held June 30, 1999 in Jacksonville, Florida. The list of invitees and
15 attendees to this meeting is included in Exhibit TCF#3.

16

17 Q. Did you attend this meeting?

18

19 A. Yes. I was employed by Sprint at the time.

20

21 Q. Please identify the relief alternatives considered at the June 30, 1999 relief meeting for the
22 904 NPA.

24

25

26

1 A. There were five alternatives presented for consideration in the original 904 NPA IPD
2 distributed to the industry. At the meeting, members of the industry offered one additional
3 alternative to be considered for the 904 NPA.

4
5 Alternative #1 proposed a distributed overlay covering the same geographic area as the
6 current 904 NPA.

7
8 Alternative #2 proposed a concentrated growth overlay with the ten northeastern rate centers
9 (covering Nassau, Duval, and St. Johns Counties) included in the overlay portion.

10
11 Alternative #3 proposed a geographic split. The proposed split boundary would run along
12 rate center boundaries and included Nassau, Duval, and St. Johns Counties.

13
14 Alternative #4 also proposed a geographic split with the split boundary along rate center
15 boundaries to the south of Duval County and to the west of Clay County.

16
17 Alternative #5 proposed a geographic split with one area including the rate centers in Duval
18 and Nassau Counties.

19
20 Alternative #6, proposed by a member of the industry at the meeting, was a geographic split
21 including rate centers in Nassau, Duval, Clay, and St. Johns Counties in one of the areas.

22
24 Q. How did the industry address the relief alternatives at the meeting?

25

26

1 A. The industry discussed the Alternatives and reached consensus to eliminate all of the
2 geographic split alternatives – Alternatives #3, #4, #5 and #6. Those four alternatives were
3 eliminated because they divide large local calling areas and would require customers to
4 change their telephone numbers. Additionally, Alternatives #3, #4 and #6 resulted in NPAs
5 with unbalanced lives. Lastly, Alternative #6 would create a noncontiguous geographic area.

6

7 The industry eliminated from consideration Alternative #2, a concentrated growth overlay, for
8 several reasons: 1) the portion of the 904 NPA without the overlay would have a very short
9 projected life; 2) no administrative tools have been developed to monitor the exhaust of
10 concentrated growth overlays; 3) it would divide local calling areas; 4) customer confusion
11 would result when the concentrated overlay is expanded to cover the remaining area; and 5)
12 the projected life could be drastically reduced by NXX requests from new market entrants.
13 Industry participants noted that past experience with concentrated growth overlays yielded
14 unsatisfactory results. The industry reached consensus to recommend Alternative #1, the
15 distributed overlay, as the preferred means of relief for the 904 NPA.

16

17 Q. How long will the recommended alternative provide relief to the 904 NPA?

18

19 A. The life of Alternative #1, the distributed overlay, is projected to last 10.1 years to 20.3 years.
20 The spread in years assumes that an unknown means of NXX code conservation may extend
21 the life of the NPA.

22

24 Q. Without the proposed relief, how long will the existing arrangement last for the 904 NPA?

25

26

1 A. With the current NXX code rationing established by the industry, the 904 NPA will exhaust
2 during the fourth quarter of 2001. The rationing plan allows for the assignment of six NXX
3 codes per month.

4

5 Q. At the three above-mentioned relief planning meetings, did the industry reach consensus on
6 a recommended implementation schedule?

7

8 A. The industry did discuss implementation schedules and, for the 904, the 561, and the 954
9 NPAs, the industry agreed upon an implementation interval schedule rather than a fixed
10 schedule. The industry-recommended interval schedule for an overlay calls for NANPA to
11 assign the relief NPA within 14 days of the release of a final order by the Commission.
12 Transitional dialing would begin 90 days later and mandatory dialing would begin 180 days
13 after the commencement of the transitional dialing period. The industry participants stated
14 that they would like to reserve the opportunity to revise the above-recommended intervals
15 depending upon the final relief method or methods ordered by the Commission.

16

17 For the 305/786 NPA, the industry requested an expedited decision due to the extreme
18 shortage of available NXX codes.

19

20 Q. What is the industry's recommended dialing plan for each of the recommended NPA relief
21 alternatives?

22

24 A. Because the industry recommended the distributed overlay alternative in each case above,
25 the industry recommended a 10-digit local dialing plan both within and across NPA

26

1 boundaries of the existing NPAs and the new relief NPAs. This is consistent with FCC rules
2 and industry Guidelines.

3

4 Q. Does this conclude your testimony?

5 A. Yes, it does.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

24

25

26

MORRISON & FOERSTER LLP

ATTORNEYS AT LAW

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

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

STAMP & RETURN

NEW YORK
LONDON
BRUSSELS
BEIJING
HONG KONG
SINGAPORE
TOKYO

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

August 3, 1999

By Overnight Courier

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shnard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Petition of the North American Numbering Plan
Administrator on Behalf of the Florida
Telecommunications Industry for Approval of a
Relief Plan for the 305/786 Area Codes

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of the Petition of Lockheed Martin IMS ("LMIMS"), as the North American Numbering Plan Administrator, on Behalf of the Florida Telecommunications Industry, requesting approval of a relief plan for the 305/786 area codes. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

Under separate cover, I am also filing a letter from Ron Conners of LMIMS, for permission for the undersigned to act as a qualified representative on LMIMS's behalf in this proceeding. Pursuant to this request, I would also ask that my name be added to the Commission's official service list for this proceeding.

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

Respectfully submitted,



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

RECEIVED & FILED
Jan
FPSO - DIVISION OF RECORDS

Enclosures

dc-169152

DOCUMENT NUMBER-DATE

09219 AUG-4 99

FPSO - DIVISION OF RECORDS REPORTING

**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 305 Area Code

Docket No. 990455-TL

**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 an all services expanded overlay relief plan for the 305 Numbering Plan Area (“NPA”), which was developed through Industry consensus.² Based upon historical demand for central office codes (“CO codes”), results received from carriers in response to the 1999 Central Office Code Utilization Survey (“COCUS”), and results received in response to a special 1999 COCUS, NANPA estimates that without NPA relief, the supply of CO codes for the 305 NPA will exhaust

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.

during the first quarter of 2000.³ Because of the projected exhaust of 305, NANPA declared Extraordinary Jeopardy⁴ for the 305 NPA on March 22, 1999. The Commission and the Industry were notified accordingly, and a freeze of CO code assignments in the 305 NPA was invoked. Industry participants reached consensus on June 23, 1999 to recommend to the Commission an all services expanded overlay relief plan for the 305 NPA.⁵ The Industry also reached consensus to request that the Commission issue an order on an expedited basis.⁶ In support of this Petition, NANPA submits the following:

³ In responding to the regular 1999 COCUS, carriers did not separate by geography their demand projections for the Keys portion of Monroe County from the rest of the Miami-Dade County area in the 305 and the 786 NPAs. Therefore, NANPA conducted a special COCUS so that the Industry could specify demand projections for each of geographical areas. Only 35 service providers responded to the special COCUS. The special 1999 COCUS projected a demand of 25 CO codes in the 305 NPA for the remainder of 1999 and 27 CO codes for the 786 NPA for the same time period. Because several carriers failed to respond to the special COCUS, this estimate of 52 CO codes for the combined NPAs is less than the projected demand for the 305 and 786 NPAs indicated by the regular 1999 COCUS results. Therefore, the results of both the special and the regular 1999 COCUS were taken into account in formulating the first quarter 2000 projected exhaust date. The projected exhaust date does not account for the current freeze on CO code assignments in the 305 NPA.

⁴ 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>>.

⁵ A copy of the June 23, 1999 Industry meeting minutes is attached 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

On January 6, 1998, the Commission issued an order approving relief for the 305 NPA.⁷ The Commission ordered a concentrated growth overlay relief plan to be implemented. The 786 area code was superimposed on the Miami-Dade County portion of the 305 NPA, with no changes for the Keys portion of Monroe County in the 305 NPA. The Commission also ordered that 20 of the remaining CO codes in the 305 area code be reserved for use in Monroe County.⁸ Due to an increased demand for CO codes in the 305 NPA, NANPA declared jeopardy for the 305 NPA on March 22, 1999 and an immediate freeze of the assignment of future CO codes was invoked. On April 23, 1999, the Industry held a conference call and reached consensus to continue the freeze until a relief plan is proposed. The Industry also decided by consensus that any available CO codes in the 305 NPA would be reserved for use in the Keys area.⁹

The Industry met on June 23, 1999 in Key West, Florida to discuss relief alternatives.¹⁰ Pursuant to the NPA Relief Guidelines, NANPA presented an Initial Planning Document ("IPD") at the meeting.¹¹ The IPD suggested four relief alternatives

⁷ *Request for Review of Proposed Numbering Plan Relief for 305 Area Code, Order Approving Concentrated Growth Overlay to Provide Numbering Plan Relief for the [305] Area Code, Docket No. 971058-TL, Order No. PSC-98-0040-FOF-TL (Jan. 6, 1998).*

⁸ The instant petition seeks relief for the 305 area code covering seven rate centers within the Monroe County area of the 305 area code which is not currently covered by the 786 area code. This area is often referred to as the Keys.

⁹ A copy of the minutes from the April 23, 1999 meeting is attached as Exhibit B. A copy of the final jeopardy procedures is attached as Exhibit C.

¹⁰ As of the June 23 meeting, 14 CO codes remained in the 305 NPA. Due to the return of CO codes by carriers and the Industry's agreement to reserve all available CO codes in the 305 NPA for use in the Keys, currently 20 CO codes are available for assignment in the 305 NPA.

¹¹ See Attachment 4 to Exhibit A.

and the Industry proposed an additional alternative during the meeting which was later added to the IPD. The information furnished by NANPA to the participants during the meeting included geographical maps of the 305 NPA, a description of each relief alternative, dialing requirements, and the projected lives of each alternative.

At the June 23 meeting, the participants discussed the attributes of the various alternatives for the 305 NPA. The alternatives included an expanded overlay - referred to as Alternative #1 in the IPD; an expanded overlay with an additional overlay upon the exhaust of the expanded overlay - Alternative #2; two versions of a geographic split with an expanded overlay - Alternatives #3 and #4; and a geographic split - Alternative #5.

The Industry eliminated Alternative #2, which proposed an all services expanded overlay and the imposition of future additional overlay to cover the entire expanded area. This plan was eliminated because it requires two separate forms of relief to be implemented with the second phase beginning approximately 3 years after the implementation of the first phase. It would commit the industry to a plan of action that could be rendered inappropriate by future events such as a Commission order on CO code conservation or the implementation of a nationwide conservation plan.

Alternative #3, a geographic split, was eliminated by consensus for several reasons. First, existing customers would be required to change their numbers. Second, seven digit dialing would be preserved only in areas where it presently exists, typically in the adjacent Keys.¹² Third, this alternative would take a longer period of time to implement in comparison to Alternative #1. Fourth, the permissive dialing period required for implementing a split exceeds the estimated exhaust period. Fifth, business

¹² See table on page 3 of Exhibit A.

customers having to change their numbers would incur additional expenses and experience a possible loss of business.

Alternative #4 was also excluded by consensus because it required existing customers to change their numbers. In addition, the Industry was concerned that the reservation of 297 CO codes in the new NPA may not support the estimated 12-year life of the new NPA. The Industry also had concern over the amount of time necessary to implement this plan, given the low number of CO codes currently available in the Keys.

Alternative #5 was unanimously eliminated because, as a single geographic split, the allocated CO codes would be used inefficiently and the lives of the resulting area codes are not balanced.

The Industry eventually reached consensus to recommend Alternative #1, an expanded overlay, to the Commission.

II. DESCRIPTION OF THE PROPOSED RELIEF PLAN FOR THE 305 NPA

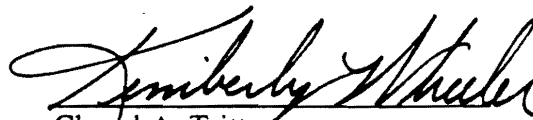
The expanded overlay alternative recommended by the Industry for the 305 NPA would expand the 786 Overlay NPA, currently covering the Miami-Dade County portion of the 305 NPA, to serve the seven rate centers in the Keys. Customers would retain their current telephone numbers. Consistent with current Federal Communications Commission regulations, the Industry reached consensus to recommend a 10 digit dialing plan both within and across NPA boundaries of the 305 and 786 NPAs. Once this alternative is approved by the Commission, CO codes in the expanded 786 overlay would be assigned to all service providers upon request, and 10 digit dialing would be effective at the end of a transition dialing period. Once the 305 NPA is exhausted, all CO code

assignments will be made in the 786 overlay area code. As a result of this plan, the area code life is projected as 3.4 to 6.7 years.¹³

III. CONCLUSION

For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests the Commission to implement an expanded overlay as the means of relief for the 305 NPA. The Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition. Given the small amount of CO codes currently available in the 305 NPA, the Industry also requests that the Commission issue an expedited Order so that relief may be implemented before the 305 NPA is exhausted.

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

August 3, 1999

¹³ Two different growth assumptions were used to project the life of the relief alternatives. The first assumption is based on the premise that CO code growth will continue in a straight-line direction approximately at the current rate of assignment through first quarter 2000. The second assumption is based on the premise that growth is reduced by 50 percent beyond first quarter 2000.

**MEETING MINUTES OF THE
305 NPA RELIEF PLANNING INDUSTRY MEETING
KEY WEST, FLORIDA, WEDNESDAY, JUNE 23, 1999**

WELCOME AND INTRODUCTIONS

Wayne Milby, Lockheed Martin NPA Relief Planner, asked the attendees to introduce themselves and identify the companies they represented. There were 19 participants at the meeting representing five different entities. See Attachment #1 for the names of those who were invited to the meeting and those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA TRANSITION

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

Mr. Milby provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. Mr. Milby provided a NANPA organizational chart for participants to review and briefly discussed the background and history behind the North American Numbering Council ("NANC") recommendation that Lockheed Martin IMS serve as the new NANPA. Mr. Milby reminded participants that the 1999 Central Office Code Utilization Survey ("COCUS") results are available on the NANPA web site (www.nanpa.com/number_resource_info/cocus_cover.html) and described numbering plan area ("NPA") relief planning activities outlined in the NANP requirements document.

REVIEW OF INDUSTRY GUIDELINES AND ATIS ORGANIZATION

Mr. Milby stated that the purpose of the meeting was for the industry to come to consensus on a single NPA relief plan to submit to the Florida Public Service Commission ("Commission") for consideration. He reviewed the Industry Approved Documentation Related to NPA Exhaust. He also reviewed Section 6 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, Mr. Milby 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 numbering committee guidelines.

It was noted that only consensus items would be recorded in the minutes and issues 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 Commission.

NPA RELIEF ALTERNATIVE ATTRIBUTES

Mr. Milby reviewed the General NPA Relief Attributes (Attachment #3) that were developed during recent Florida NPA relief industry meetings. It was noted that this list would be referenced again after the review of the Initial Planning Document ("IPD").

CODE ASSIGNMENT HISTORY FOR 305 and 1999 SPECIAL COCUS

The industry discussed the Commission's January 6, 1998 order in docket number 971058-TL which reserved 20 Central Office Codes ("CO Codes") from the 305 NPA for use in the Keys. Within that order, the Commission estimated that the 305 NPA for the Keys would last until the year 2014 (based on a usage of 1.2 CO Codes per year). However, CO Code requests within the Keys portion only of the 305 NPA have escalated and currently only 14 CO Codes remain available for assignment.

INITIAL PLANNING DOCUMENT FOR 305

The meeting participants reviewed the IPD which was prepared and distributed prior to the meeting. See Attachment #4 for a copy of the IPD. The IPD proposed and described four relief alternatives for the 305 NPA and included maps and projected lives of each alternative.

It was noted that Alternative #4, a split and expanded overlay plan, was included in the IPD because it allows 7 digit dialing to remain in the Monroe County area and provides that area with a projected life of 12 to 24 years.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 305

Alternative #5, a geographic split plan, was proposed by the industry during the meeting and the participants agreed to add the alternative to the IPD. Alternative #5 divides the seven Keys from the rest of the 305 NPA.

ELIMINATION OF ALTERNATIVES

Participant discussed the elimination of the proposed relief alternatives for the 305 NPA. Unanimous consensus was reached to eliminate Alternative #5, a single geographic split, because it is an inefficient use of CO Codes and the lives are not balanced. Next, consensus was reached to eliminate Alternative #4 because it involves number changes for existing customers and the reservation of 297 CO Codes in the new NPA may not substantiate the estimated 12 year life. Participants were also concerned over the amount of time required to implement a split alternative given the fact that there are so few codes remaining in the Keys.

Participants reached consensus to eliminate Alternative #2 from consideration because it requires two separate forms of relief to be implemented with the second phase beginning

approximately 3 years after the first phase is implemented. It would commit the industry to a plan of action that could be rendered inappropriate by future events such as a Commission order on code conservation or the implementation of a nationwide conservation plan.

Alternative #3 was also eliminated through consensus. This was eliminated because it requires existing customers to undergo number changes and only preserves 7 digit dialing where it presently exists, typically the adjacent Keys (see chart below). This alternative would take longer to implement than Alternative #1 and the permissive dialing period required for implementing a split in Alternative #3 exceeds the forecasted CO Code exhaust period. There would be additional costs to business customers including a perceived loss of business, especially tourism-based business, due to a number change.

7-Digit Dialing Between Keys

| | | | |
|-----------------|--------------|--------------|----------|
| North Key Largo | Key Largo | | |
| Key Largo | Islamorada | N. Key Largo | |
| Islamorada | Key Largo | Marathon | |
| Marathon | Big Pine Key | Islamorada | |
| Big Pine | Marathon | Sugarloaf | Key West |
| Sugarloaf Key | Key West | Big Pine | |
| Key West | Sugarloaf | Big Pine | |

CONSENSUS ON RELIEF ALTERNATIVE

There was consensus to recommend Alternative #1 to the Commission because the other alternatives were eliminated.

Statement for the Record from MCI WorldCom

Although MCI WorldCom does not oppose an overlay, we do suggest that an overlay alternative and a split alternative be submitted to the Commission, only if the split alternative does not split rate centers.

IMPLEMENTATION INTERVALS FOR 305

Industry participants did not discuss implementation intervals in detail in light of the 1Q2000 projected exhaust of 305. The participants request that the Commission issue a relief order on an expedited basis.

DIALING PLAN AND INDUSTRY COMMITMENT FOR TEST NUMBER

Consensus was reached to adopt a 10 digit dialing plan within and across NPA boundaries consistent with Federal Communication Commission requirements.

The existing 786 test number (786) 242-9998 will be used.

SUBMISSION TO THE FLORIDA PUBLIC SERVICE COMMISSION

Industry participants reached consensus to have NANPA petition the Florida Public Service Commission for approval of a NPA Relief Plan for the 305 NPA. Alternative #1, a distributed overlay, will be submitted for consideration.

APPROVE MINUTES, DRAFT PETITION and JEOPARDY CONFERENCE CALL

It was the consensus of the industry participants to convene via conference call to approve the meeting minutes and the draft filing of the 305 NPA relief planning meeting on July 21, 1999 at 9:00 a.m. EST. The draft filing and meeting minutes will be distributed by July 16, 1999. Thirty ports have been reserved for the July 21 conference call. Dial Information: (612) 335-3420 + access code 2209 *. Wayne Milby will host the conference call. The call is expected to last three hours.

A Jeopardy conference call immediately following the review of the meeting minutes and draft petition will be held on July 21, 1999 also. The same conference bridge will be utilized.

Some discussion took place during the July 21, 1999 Industry conference call regarding unavailable CO Codes and an updated list of unavailable CO Codes for the 305 NPA has been provided. Further discussion regarding this matter will take place during an August 10, 1999 Industry extraordinary jeopardy conference call.

**Attendees and Invitees
 305 NPA Industry Relief Planning Meeting
 June 23, 1999**

| Init | Last Name | First Name | Company | Phone | Fax |
|------|------------|------------|-----------------------------------|--------------|--------------|
| | Adair | Grady | GTE - Florida | 813-483-2529 | 813-223-4888 |
| | Albenco | David | All Florida Paging | 800-815-0216 | 407-260-5823 |
| | Albertson | Darren | Allegiance Telecom | 214-261-7165 | 214-461-8686 |
| | Alexander | Bridget | ITC DeltaCom | 706-645-9026 | 706-645-9077 |
| | Alexander | Steve | Peoples Telephone Company | 305-593-9667 | 800-864-3355 |
| | Allen | William | Bell Atlantic | | 518-465-0385 |
| | Allen Jr. | Thomas E. | Intermedia Comm., Inc. | 813-621-0011 | 813-663-2312 |
| | Allington | Gary | BellSouth | 407-237-3319 | 407-237-3054 |
| | Audu | Jonathan | Florida PSC | 850-413-6552 | 850-413-6563 |
| | Bacon | Anita | AT&T Wireless Services | 972-776-4522 | 972-776-4572 |
| | Baker | Barry | AirTouch Paging | 904-396-1510 | 904-396-4708 |
| | Ball | Carlton | GTE Florida | 813-483-2536 | 813-204-8862 |
| X | Barrett | Michael | Florida PSC | 850-413-6544 | 850-413-6545 |
| | Beary | James | Porta-Phone Paging | 850-841-7100 | 850-561-8996 |
| | Beck | Charlie | Florida Public Service Commission | | |
| | Bennett | Mary | Radiofone, Inc. | 504-830-5486 | 504-831-7859 |
| | Bennett | Bruce | Lockheed Martin-NANPA | 925-363-8701 | 925-363-8714 |
| | Benson | Al | BellSouth | 904-350-3359 | 904-355-8210 |
| | Biddix | Timothy | Intermedia Communications | 813-829-4988 | 813-829-6987 |
| | Birtwistle | Rick | AirTouch Paging | 404-876-1624 | 404-257-5066 |
| | Boger | Michael | Daytone Telephone Company | 901-384-9100 | 901-385-7020 |
| | Bolich | Mark | AirTouch Paging | 727-572-7482 | 727-573-0329 |
| | Bonifacic | Jennifer | Alltel Communications | | 773-399-2536 |
| | Bonslow | Daniel | Tel-Save, Inc. | 215-862-1500 | 215-862-1085 |
| | Brady | Jim | Bell South Mobility | 407-771-1301 | 407-805-8914 |
| | Brannon | Debby | Teligent | 703-460-2319 | |
| | Brantley | Mike | Arch Communications | | 770-498-3916 |
| | Brege | Jim | BellSouth Mobility, Inc. | 407-247-0002 | 407-805-8914 |
| | Brieaddy | Tom | TSR Paging | 619-268-5050 | 619-268-8063 |
| | Brooks | Suzanne | MCI World Com | 972-656-1430 | 972-656-1499 |
| X | Brown | Bill | BellSouth Cellular Corp. | 404-249-0486 | 404-249-0453 |
| | Brown | Joy | Quincy Telephone | 850-875-5214 | 850-875-5226 |
| | Brown | Scott | MCI Metro | 404-267-5936 | 404-825-5992 |
| | Brown | Steven | Intermedia Communications, Inc. | 812-829-2231 | 813-829-4923 |
| | Browne | Lydelle | Intercontinental Comm. Group | 561-274-8044 | 561-274-3964 |
| | Brownworth | Steven | Interstate FiberNet | 706-645-8555 | 706-645-8989 |
| | Bumgamer | Jack | Central Wireless Partnership | 559-440-0164 | 559-440-0297 |
| | Burleson | Ron | BellSouth Cellular | 404-249-0455 | 404-249-0455 |
| | Butler | Virginia | BellSouth | 904-350-3400 | 904-350-4150 |
| | Cabrera | Bill | AGR Electronics/Metro Call | 305-556-8438 | 305-827-1005 |
| | Cairon | Frank | PrimeCo PCS | 904-348-3640 | 904-348-3618 |
| | Campbell | David | Vista-United Telecommunications | 407-827-2112 | 407-827-2128 |

| | | | | | |
|---|--------------|------------|-----------------------------------|--------------|--------------|
| | Castle | Gregory | Pacific Bell | 415-542-7083 | 415-543-2935 |
| | Chavez | John | General Paging | 305-267-5554 | 305-267-5554 |
| X | Childers | Judy | BellSouth - Reg. & Ext. Affairs | 305-347-5414 | 305-577-3027 |
| | Cigler | Jim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Clark | Tony | Seiko Communications Systems | 503-531-1624 | 503-531-0519 |
| | Clark | Melanie | Sprint PCS | 407-475-0616 | 407-475-0524 |
| | Climmer | Tom | Intermedia Communications | 800-940-0011 | 813-829-2281 |
| | Cocotta | Sue | Frontier Local Services | 716-777-1692 | 716-325-4481 |
| | Colaco | Frank | Lockheed Martin-NANPA | 973-740-9100 | 973-740-9119 |
| | Collins | Shannon | Lockheed Martin | 925-363-8707 | 925-363-8729 |
| | Cooperman | Kenneth | BellSouth | 305-622-3250 | 305-622-3292 |
| | Cotter | Mary | Time Warner-Syracuse | 315-463-2288 | 315-463-2088 |
| | Cox | Will | Florida Public Service Commission | 850-413-6204 | 850-413-6205 |
| | Cratem | Richard | Teleco Engineer Manager | 904-348-3624 | 904-348-3818 |
| | Cutting | John | Florida PSC | 850-413-6844 | 850-413-6845 |
| | Dantley | James | IDS Telecom///Quincy | 850-875-5205 | 850-875-5226 |
| | Damutzer | Ron | Meretel Communications | 318-421-6215 | 318-421-6233 |
| | Davi | Anthony | Lockheed Martin -NANPA | 925-363-8705 | 925-363-8714 |
| | Davidson | Darcy | SEIKO Communications Systems | 503-531-1624 | 503-531-0519 |
| | Day | Steven | Metrocall | 703-660-6677 | 703-765-4385 |
| | Deese | Elaine | Alltel Communications, Inc. | 704-845-7290 | 704-845-7229 |
| | Deweese | Robert | Peabody & Brown | 617-345-1316 | 617-345-1300 |
| | Dixon | MaryAnn | Sprint | 407-889-1330 | 407-884-1978 |
| | Dolensky | Ed | BellSouth Industry Relations | 205-321-2010 | 205-321-4754 |
| | Downs | Jena | Bell Atlantic | 410-736-6711 | 410-736-6066 |
| | Duff | Jason | Sprint | 407-889-6807 | 407-884-0206 |
| | Duplechin | Derrel | Columbia Telecom, Inc. | 504-927-6815 | 504-927-6818 |
| | Edwards | Toni | Vista Untied | 407-827-2004 | 407-827-2220 |
| | Eicholz | Kathy | Sprint Communications | 913-534-2605 | 913-534-5366 |
| | Eldredge | Paul | Comay Telco Inc. | 508-390-9000 | 516-794-1742 |
| | Eiter | Jim | PageNet | 908-541-6151 | 908-541-6150 |
| | Eudy | Harriet | Alltel | 904-364-2517 | 904-364-2474 |
| | Faul | Kelly | MCI World Com. | 703-918-0457 | 703-918-6814 |
| | Fields | Helen | CONXUS Network, Inc. | 864-241-5412 | 864-241-8197 |
| | Figlioli | Vito | Sprint PCS | 813-639-2023 | 813-639-2050 |
| X | Flaherty | Reva | Bell South | 305-347-5405 | 305-577-3027 |
| | Flores | Adrienne | AT&T Wireless | 201-291-8067 | 201-291-8044 |
| X | Foley | Thomas | Sprint | 407-889-6168 | 407-884-1919 |
| | Fondren | John H. | Hart Communications | 912-242-3237 | 912-242-5363 |
| | Fordham | Lee | Florida Public Service Commission | 850-413-6226 | 850-413-6227 |
| | Foss | L.Theodore | Newport Telephone Co. Inc | 315-845-8112 | 315-845-8662 |
| | Fraze | George | BellSouth - Reg. & Ext. Affairs | 850-224-5139 | 850-222-8640 |
| | Frederickson | Jim | Bravo Cellular, L.L.C. | | |
| | Fredlund | Andy | Arch Communications | 561-912-7410 | 561-912-7450 |
| | Fry | Terry | City of Lakeland | 941-499-8760 | 941-499-8761 |
| | Gadbois | Steve | Arch Communications | 704-341-5131 | 704-544-0103 |
| | Gaffney | John | Nextel | 914-448-4309 | 914-421-2700 |
| | Gagneaux | Lew | BellSouth Public Comm. Inc | 205-943-2620 | 205-943-2508 |

| | | | | |
|-------------|-----------|-------------------------------|--------------|--------------|
| Gallagher | Josephine | Bell Atlantic | 703-974-8160 | 703-974-0616 |
| Gerstemeier | Richard | Time Warner AXS of Florida | 407-215-6800 | 407-215-6803 |
| Gifford | Jennifer | Nextel | 617-839-5622 | 617-839-5912 |
| Glover | Joanne | BellSouth | 904-350-3743 | 904-350-4150 |
| Goette | Fred | G.B.F.A.N | 912-746-1372 | 912-746-1373 |
| Gonos | Daniel | Winstar | 248-539-7877 | 248-539-7879 |
| Gonzalez | Izzy | MediaOne | 904-619-3323 | 904-619-3355 |
| Gonzalez | Julian | Beep-Net | 305-388-3100 | 305-388-9130 |
| Gonzalez | Daniel | NEXTLINK Communication, Inc | 202-721-0999 | 202-721-0995 |
| Goodell | Paul | Priority Communications | 561-750-8899 | 561-391-4705 |
| Gooden | Debra | MCI | 972-656-5575 | 972-656-1499 |
| Goodgine | Janice | Bell South | 205-977-0741 | 205-977-7877 |
| Goodroe | Lynn | MCI World Com | 601-460-8852 | 601-460-8864 |
| Graham | Mildred | Sprint | 407-889-6102 | 407-884-0206 |
| Grant | Dennis | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| Gray | Bob | BellSouth Long Distance, Inc. | 770-352-3021 | 770-352-3184 |
| Gray | Eddie | GTE Wireless | 678-339-4412 | 678-339-8572 |
| Green | Barbara | Sprint | 407-889-1330 | 407-884-1978 |
| Greene | Linda | Bell Atlantic | 410-736-6828 | 410-736-6066 |
| Greer | Stan | BellSouth Telecommunication | 850-224-5139 | 850-224-5073 |
| Griffith | Georgia | Media One d/b/a Amer Ca Sys | 914-762-8684 | 914-762-0799 |
| Guariglia | Annette | MCI | 914-312-2287 | 914-312-2287 |
| Guepe | Richard | AT & T | 404-810-7389 | 404-810-5901 |
| Guerrero | Rick | Cox California Telcom | 949-716-2024 | 949-716-2007 |
| Hager | Doug | Alltel Communications, Inc. | 704-845-7275 | 704-845-7382 |
| Haines | Carmen | Excel Communications | 972-588-4714 | 972-588-4951 |
| Hancock | Hershel | GTE Mobilnet of Tampa, Inc. | 813-282-6417 | 813-620-4124 |
| Harshbarger | A. L. | GTE | 813-483-2541 | 813-204-8862 |
| Hartman | Ken | Bell South Telecom, Inc. | 404-927-8670 | 404-524-2918 |
| Hartsfield | Don | Arrow Communications/ITS | 561-597-2827 | 561-597-2110 |
| Hatch | Alice | Omnipoint | 954-457-5744 | 954-457-5705 |
| Hatfield | Steven | ATTWS | 941-551-4055 | 941-551-4033 |
| Hatton | Ron | GTE Florida | 813-483-3912 | 813-204-8857 |
| Hayes | Sheila | Sprint | 913-534-2623 | 913-534-5366 |
| Heaton | Francis | Wireless One Network L.P. | 941-489-1600 | 941-489-1622 |
| Henderson | Anne | AT&T | 404-810-8913 | 404-810-6422 |
| Higgins | Jeannine | Bell Atlantic | | 716-842-7090 |
| Hiltz | Cara | Adelphia Business Solutions | 412-220-5083 | 412-220-5164 |
| Hobson | Elizabeth | BellSouth Mobility, Inc. | 407-771-1321 | 407-805-8914 |
| Hogan | Jeff | Teleport Communications | 718-355-2797 | 718-355-4804 |
| Hogue | John | Sprint | 913-624-6016 | 913-624-5504 |
| Holmes | Dennis | OpTel, Inc. | 214-634-3842 | 214-634-3837 |
| Holt | Lew | Aerial Communications | 813-243-3224 | 813-243-1906 |
| Hopfer | Bill | Continental FL Telecom | 904- | 904-731-8699 |
| Horton | Chris | AirTouch Cellular | 404-257-5314 | 404-257-5066 |
| Hoskins | Ann | Bell Atlantic - Legal Dept. | 212-395-6511 | 212-768-7568 |
| Hunter | Dena | Media One | 303-705-5145 | 303-790-1094 |
| Huntley | David | Cellular One | 617-462-5094 | 617-462-5024 |
| Hutchison | Kim | AT&T | | |

| | | | | | |
|---|-------------|------------|---|--------------|--------------|
| | Huttenhower | Bill | Vista United | 407-827-2182 | 407-827-2424 |
| | Hymans | Linda | Lockheed Martin-NANPA | 512-331-0751 | |
| X | Ilen | Levent | Florida Public Service Commision | 850-413-6562 | 850-413-6563 |
| | Imbag | Jennifer | TSR Wireless LLC | 818-346-0611 | 818-346-1543 |
| | Irwin | Chris | Aenal Communications | 773-399-6843 | 773-864-9235 |
| | Israel | Susan | BellSouth Cellular | 404-249-0478 | 404-249-0453 |
| | Jackson | Lester | Allsafe Paging | 904-268-7233 | 904-268-4504 |
| | James | Michelle | MCI WorldCom | 616-224-4603 | 616-224-5110 |
| X | Jardon | Mario | BellSouth Mobility | 561-995-3583 | 561-988-2729 |
| | Jobe | Jack | Dynatel Paging | 904-730-6000 | 904-730-2012 |
| | Johnson | Jeannie | Sprint | 407-830-3044 | 407-884-1978 |
| | Jordan | Paula | AirTouch Cellular | 925-279-6033 | 925-279-6621 |
| | Kelly | Lonnie | Foothills Rural Telephone Corp. Inc. | 606-297-3501 | 606-297-2000 |
| | Kennicott | Deborah | AT&T - Wireless | 773-695-2171 | 773-695-2190 |
| | Kenworthy | Pamela | Lockheed Martin- NANPA | 973-267-7812 | 973-267-7921 |
| | Key | Tony | Sprint Communications | 404-649-5144 | 404-649-5174 |
| | Khazraee | Sandy | Sprint | 850-847-0173 | 850-878-0777 |
| | Kim | Donna | Accutel Comm., Inc. | | |
| | Kimmell | Beth | Sprint | 816-559-5023 | 816-559-5093 |
| | Kinlen | Charlene | BellSouth | 561-468-5540 | 561-464-4137 |
| | Kittrick | Kathleen | Vanguard Cellular Systems, Inc. | 717-319-4446 | 717-579-4060 |
| | Klugerman | Paul | ABC Paging | 305-621-6000 | 305-521-4475 |
| | Krug | John | AT&T | 718-355-2762 | 718-355-4804 |
| | Kwon | Rhea | Allegiance Telecom | 312-228-6192 | 312-228-6180 |
| | LaCava | Julie | Bell Atlantic | 518-396-1046 | 518-465-8488 |
| | Langford | Thomas | Mercury Paging & Comm. | 914-471-0833 | 516-677-9510 |
| | Lanning | Ken | Intermedia Communications | 813-829-6605 | 813-829-2281 |
| | LaPlante | Doug | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| | Lee | Steven | Airsignal of California, Inc. | 310-641-2366 | 310-641-2342 |
| | Lee | David | Allsafe Paging | 904-268-1111 | 904-268-4504 |
| | Lewis | Charles W. | Nextlink | 305-626-2808 | 305-626-9602 |
| X | Lewis | Charles M. | BellSouth | 404-927-2047 | 404-873-0432 |
| | Lezcano | Ed | Rainbow Paging | 305-593-7711 | 305-593-8844 |
| | Lipsky | Ted | Rainbow Paging | 305-594-7711 | 305-593-8844 |
| | Locke | Jerry | Orlando Tel. Co. | 407-996-8900 | 407-996-8901 |
| | Logering | Dennis | American Paging | 813-288-9497 | 813-289-3966 |
| | Ludwikowski | Scott | Sprint Spectrum PCS | 913-315-2611 | 913-315-2532 |
| | Lukowski | Raymond | WinStar Telecommunications, Inc. | 703-645-5466 | 703-645-5704 |
| | Lunceford | Gene | BellSouth | 205-321-2013 | 205-321-4754 |
| | Luttrell | Steve | Vista United | 407-827-2232 | 407-827-2600 |
| | Mallicote | Brenda | GTE Wireless | 813-282-6144 | 813-282-6040 |
| | Mangelo | Richard | ATT Local | 732-771-2690 | 908-771-8268 |
| | Marchant | Dick | Intermedia Communications of Florida | 813-829-4020 | 813-829-5722 |
| | Marshall | Fred | DataCom | 318-234-3438 | 318-269-1284 |
| | Martin | Charles | BellSouth Long Distance Inc. | 770-352-3249 | 770-352-3184 |
| | Martin | Michael | Aenal Communications | 813-243-3217 | 813-243-1906 |
| | McCallen | Ray | BellSouth Telecommunications | 205-321-8906 | 205-321-4754 |

| | | | | | |
|---|---------------|------------|--|--------------|--------------|
| | McCarthy | Angela | MapMobile Communications | 757-424-1191 | 757-578-4963 |
| | McCartney | Joe | AGR/Pronet Paging Inc. | 727-572-6646 | 727-573-7844 |
| | McClellan | Garry | West KY Rural Telephone | 502-674-1000 | 502-856-3313 |
| | McCullough | Douglas A. | BellSouth Telecommunications | 205-977-5069 | 205-977-7877 |
| | Meins | Charlene | AT&T Wireless | 425-580-8132 | 425-806-3662 |
| | Meldazis | Daniel | Focal Communications Corp. | 312-895-8272 | 312-895-8403 |
| | Merrill | J.B. | BTI | 919-510-7270 | 919-510-7239 |
| | Merriman | Rebecca | BellSouth | | |
| | Merritt | Garey | PageNet of America | 407-649-8007 | 407-872-3808 |
| | Messer | Steve | Alltel | 850-845-4050 | 850-847-4671 |
| | Milby | Wayne | Lockheed Martin-NANPA | 804-795-5919 | 804-795-5514 |
| | Milchuck | Kim | Adelphia Business Solutions | 814-260-6901 | 814-260-6867 |
| | Mitchell | Tim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Monagle | Dan | Bell Atlantic | 215-963-6004 | 215-563-2658 |
| | Mosca | Paul | Cellular One | 617-462-7048 | 617-462-5975 |
| | Mostrom | Eric | Norcom, Inc. | 561-392-2550 | 561-392-0716 |
| | Murray | Melissa | KMC Telecom | 770-638-2485 | 770-806-4988 |
| | Murray, III | John J. | Payphone Consultants, Inc. | 954-484-2500 | 954-714-0005 |
| | Nanos | Janet | Omnipoint Communications | 973-290-2513 | 973-290-2445 |
| | Newkirk | Terry | Time Warner | 303-566-5954 | 888-329-0668 |
| | Nobles | Deborah | Northeast Florida Telephone Company | 904-259-0639 | 904-259-7722 |
| X | Nugue | Carlos | PrimeCo Personal Communications | 561-995-5723 | 561-995-5514 |
| X | Packer | Howard | BellSouth Mobility | 954-850-6400 | 954-850-6400 |
| | Parker | Dennis | UNICOM Communications, LLC | | |
| | Paswaters | Shirley | Level 3 Communications | 303-635-9602 | 303-635-9530 |
| | Pendleton | Charles | CAP Management, Inc | 606-432-0720 | 606-433-0500 |
| | Phillips | Bubba | AT&T Long Distance | 770-785-5773 | 770-929-4348 |
| | Potter | Paul | Time Warner Telecom | 407-215-6850 | 407-215-6801 |
| | Prefer | John | Priority Communications | 561-750-8899 | 561-391-4705 |
| | Pressler | Dave | Communications, Inc. | 800-476-3427 | 334-626-3171 |
| X | Queenin | Larry | BellSouth | 954-742-1389 | 954-746-0862 |
| | Randall | Jacqueline | Level 3 Communications | 303-635-9603 | 303-635-9530 |
| | Rehwinkel | Charles | Sprint Florida | 850-847-0244 | 850-878-0777 |
| | Reichenberger | Tom | Aerial Communications | 813-243-3205 | 813-243-1906 |
| | Reid | Sean | Metrocall | 850-438-1653 | 850-432-9208 |
| | Renna | Diane | AT&T Local | 908-234-7347 | 908-234-7246 |
| | Reuter | Larry | US Cellular | 352-665-4332 | 652-665-4492 |
| | Rios | Mireya | PageMart | 214-765-3853 | 214-765-4981 |
| | Ripper | Elder | Telephone Company of Central Florida, Inc. | | |
| | Roberts | Sherita | LDDS WorldCom | 918-590-8529 | 918-590-5598 |
| | Rosario | Reggie | Paging Network of Tampa | 813-873-8400 | 813-876-3710 |
| | Ross | Cathy | Citizens Communications | 214-365-3340 | 214-365-4059 |
| | Rowland | Tom | North Central Tel. Coop. | 615-666-2151 | 615-666-6772 |
| | Rush | Lee | Alltel | | |
| | Rutherford | Pam | Alltel Florida | 704-845-7196 | 704-841-3231 |
| | Ryan | William | Cable Vision of New York City | 718-991-6000 | 718-378-2625 |
| | Sadler | Harry | GTE Florida | 813-483-2005 | 813-228-8733 |
| | Salpietra | Carl | Nextel | 407-948-2142 | 407-667-1240 |

| | | | | | |
|---|------------|----------|---------------------------------|--------------|--------------|
| | Sanders | John | Preferred Networks, Inc. | 770-582-3723 | 770-734-0936 |
| | Sawyer | Bill | BellSouth | 904-350-4541 | 904-355-8210 |
| | Schiltz | Jeanne | TPS Telecom | 608-664-4236 | 608-664-4225 |
| | Schreier | Fran | Sprint PCS | 816-559-5290 | 816-559-5093 |
| | Schwartz | Mike | General Comm.&Elec. Corp | 516-501-0466 | 516-501-0464 |
| | Scobie | Michael | GTE | 813-483-2530 | 813-223-4888 |
| | Serenci | John | Bell South | 954-928-4710 | 354-772-5105 |
| | Shapiro | Phil | AT& Comm. Of NY Inc. | 518-463-2555 | 518-463-5943 |
| | Sheets | Scott | Airtouch Paging | 972-860-3353 | 972-860-3248 |
| | Shoenfelt | Terry | Strategic Technologies, Inc. | 305-229-6591 | 305-229-6580 |
| | Sidelia | Brian | Adelphia Business Solutions | | |
| | Simona | Miles G. | BellSouth Mobility | 561-477-4411 | 561-477-4411 |
| | Sinha | Vijay | Aerial Communications | 773-399-7508 | 773-864-9337 |
| | Slavik | Ron | AT & T Wireless | 407-667-5682 | 407-875-0422 |
| X | Smith | Dana | PrimeCo Personal Communication | 817-258-1036 | 817-258-1805 |
| X | Snider | Vicki | BST Infrastructure Planning | 954-928-4740 | 954-772-5105 |
| | Snyder | Bob | Pagemart, Inc. | 214-765-4209 | 214-765-4981 |
| | Stedie | Mazen | Pager One of Florida, Inc. | 561-687-8400 | 561-687-1235 |
| | Stephenson | Suzannee | BellSouth Mobility, Inc. | 407-771-1311 | 407-805-8914 |
| | Stevens | Aloha | Citizens Communication | 801-553-0274 | 801-553-0905 |
| | Stipe | Bill | ACSI of AL | 301-617-4220 | 301-483-7667 |
| | Struthers | Brent | Lockheed Martin-NANPA | 847-836-0785 | 312-814-1818 |
| | Sullivan | John G. | Eastern Telelogic Corp. | 610-992-8556 | 610-337-1444 |
| | Tapia | Larry | GTE Florida | 813-483-2188 | 813-221-8103 |
| | Tatem | Tim | BellSouth Mobility, Inc. | 407-719-0010 | 407-805-8914 |
| | Taulbee | Kathy | Sprint | 407-889-1592 | 407-884-0206 |
| | Taylor | Greg | Digiph | 770-446-5020 | 770-446-5035 |
| | Telecom | Manager | Group Long Distance Inc. | | |
| | Telecom | Manager | Intetech, L.C. | | |
| | Thakur | Tony | Time Warner Telecom | 407-215-6800 | 407-215-6803 |
| | Thomas | Denise | MCI WorldCom | 925-824-2007 | 925-244-1300 |
| | Thomas | Bill | GT Com | 850-229-7222 | 850-227-7366 |
| | Thomas | Steve | GTE Florida | | |
| | Thompson | Leon | Nextel Communications | 770-326-7965 | 770-326-7966 |
| | Thompson | Doug | Ameripage, Inc. | 305-231-8008 | 305-827-4906 |
| | Tinsley | Charles | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | Tirador | Judy | Omnipoint Communications | 973-290-2411 | 973-290-2445 |
| | Tolliver | Ron | Intermedia Communications, Inc. | 813-744-2438 | |
| | Tomblin | Jeff | Paging Network, Inc. | 972-985-5162 | 972-985-6519 |
| X | Toolsie | Ramesh | Primeco | | |
| | Twombly | Dana | Utilities, Inc. | 207-642-7208 | 207-642-3095 |
| | Ude | Harriott | Alltel | | |
| | Upton | Jodi | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | Valdez | Ed | Teligent | | |
| | Valenzi | Steven | Sprint Spectrum L.P. | 954-423-5250 | 954-423-5267 |
| | Van Allen | Eric | Palmer Cellular | | 912-650-7321 |
| | Van Brown | Barbara | MGC Communications, Inc. | 702-310-4242 | 702-310-5712 |
| | Van Dyke | Robert | Intermedia Communications | | |
| | Van Leer | Dave | Bell South | 904-350-2167 | 904-358-1060 |

| | | | | | |
|---|----------|------------|----------------------------------|--------------|--------------|
| | Vaughn | John H. | St. Joseph Tel. Co. | 850-229-7221 | 850-229-8689 |
| | Wall | Billy | AirTouch Paging | 407-741-5581 | 407-740-7624 |
| | Walsh | Tucker | MCTA | | 601-352-2280 |
| | Waters | Ron | GTE Florida | | |
| | Watkins | Daryl | GTE Wireless | 813-282-6431 | 813-620-4124 |
| | Watson | Dana | PrimeCo Personal Communications | 817-258-1270 | 817-258-1243 |
| | Watson | James C. | Z- Tel, Inc. | 941-540-8440 | 941-542-4408 |
| | Watson | Dana | PrimeCo Personal Communications | 817-258-1270 | 817-258-1243 |
| | Wax | Dennis | Bell Atlantic | 518-396-1020 | 518-465-8488 |
| | Weeks | Rick | BellSouth | 954-928-4737 | 954-492-1752 |
| | Welbaum | Deana | City of Lakeland | 941-499-6803 | 941-499-8821 |
| | Whelton | Thomas | Cellular One | 617-462-5081 | 617-462-5038 |
| X | Whipple | Larry | BellSouth | 305-622-3263 | 305-622-3292 |
| | Wickham | Jennifer | Goetek Communications, Inc. | 201-930-5187 | 201-930-0287 |
| | Wieners | Paul | CTC Communications | 781-466-1231 | 781-466-1263 |
| | Wiggins | Patrick K. | Telephone Co. of Central Florida | | |
| | Wiginton | Bill | Pagenet | 972-801-8051 | 972-801-8966 |
| | Wilfer | Jackie | Vescio - MGC | | |
| X | Williams | Frederick | MCI WorldCom | 972-656-1816 | 972-656-1499 |
| | Williams | Terry | Nextel Communications | 407-948-2145 | 407-667-1240 |
| | Williams | Lloyd | Super Telecom | 305-476-4240 | 305-443-1078 |
| | Willis | Betty | Alltel | | |
| | Willis | Eleanor | Winstar Telecommunications Inc | 202-530-7656 | 202-530-0977 |
| | Wooten | Kristy | Mobil Comm | 601-977-1575 | 601-977-1748 |

305 NPA RELIEF INDUSTRY MEETING
Wednesday, June 23, 1999
Hilton Key West, 245 Front Street, Key West, Florida 33040
Telephone: 305 294-4000

- 8:30 Welcome and Introductions
- 8:35 NANPA's Role and Responsibilities
- 8:45 Minutes and "Statements For The Record"
- 9:00 Review Code Assignment History – Special 1999 COCUS
- 9:30 Industry Guidelines/Relief Attributes
- 10:15 Review Initial Planning Document
- 11:15 Break
- 11:30 Additional Alternatives from Industry
- 12:00 Lunch (On Your Own)
- 1:00 Elimination Of Alternatives
- 2:00 Consensus On Relief Alternative
- 2:10 Consensus on Dialing Plan
- 2:30 Break
- 2:50 Consensus on Implementation Intervals
- 3:00 Industry Commitment For Test Number
- 3:15 Statements for the Record
- 3:30 Consensus on NANPA Filing Industry Efforts With Commission
- 3:45 Set Date For Conference Call To Approve Meeting Notes *
- 4:00 Complete NANPA Survey
- 4:30 Adjourn

***The agenda has been structured to discuss relief planning for the entire day, but if time permits, a jeopardy meeting will be convened if possible immediately following the relief planning agenda.**

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: 305 NPA (The Keys)

North American Numbering Plan Administration

305 NPA (The Keys) Relief Alternatives

786 Expanded Overlay - Alternative # 1

As more relief is required by the Keys of Monroe County during 1Q2000, the 786 Overlay NPA would expand to serve the Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, and Sugar Loaf Key rate centers. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required. Codes in the expanded 786 overlay NPA will be assigned to all service providers upon request with an effective date of the end of the transition dialing period to 10 digit dialing. At exhaust of the 305 NPA all code assignments will be made in the 786 overlay area code.

Total codes at 305 Exhaust = 970
Area code life in years = 3.4 to 6.7

786 Expanded Overlay + Additional Overlay – Alternative # 2

Upon exhaust of the Expanded Overlay in Alternative # 1 in 4Q2003, an additional overlay NPA Code would be added to serve the entire 305 & 786 geographic areas which includes the Big Pine, Homestead, Islamorada, Key Largo, Key West, Marathon, Miami, North Dade, North Key Largo, Perrine and Sugar Loaf Key rate centers. Customers would retain their current telephone numbers and also continue with the 10-digit dialing introduced with the 786 Overlay.

Total codes at 305 Exhaust = 970
Area code life in years = 7.8 to 15.6

NPA Split /Expanded Overlay – Alternative # 3

At the exhaust of the 305 NPA during 1Q2000, the Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, and Sugar Loaf Key rate centers of Monroe County would be split off from the 305 NPA and assigned a new NPA. The split boundary runs along rate center boundaries near the County boundary between Monroe and Miami-Dade Counties. Upon exhaust of the existing 786 overlay over Dade County in approximately four years, the new NPA would be expanded over the Dade County geographic area. Seven-digit local dialing would continue to be permitted where it presently exists which is typically adjacent Keys within the Monroe County geographic area. Codes in the NPA would not be assigned in Miami-Dade county before exhaust of the 786 NPA.

The exchanges in Area A, Miami-Dade County, include:

Area A Homestead Miami Perrine North Dade

Total codes at 305 Exhaust = 889
Area code life in years = 7.8 to 15.6

The exchanges in Area B, Part of Monroe County, include:

Area B Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, Sugar Loaf Key
Total codes at 305 Exhaust = 81
Area Code life in years = 8.0 to 16.0

NPA Split /Expanded Overlay – Alternative # 4

At the exhaust of the 305 NPA during 1Q2000, the Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, and Sugar Loaf Key rate centers of Monroe County would be split off from the 305 NPA and assigned a new NPA. The split boundary runs along rate center boundaries near the County boundary between Monroe and Miami-Dade Counties. Upon exhaust of the existing 786 overlay over Dade County in approximately four years, the new NPA would be expanded over the Dade County geographic area, and 297 NXX Codes in the new NPA would be reserved for Monroe County to provide for an estimated 12 year life. Seven-digit local dialing would continue to be permitted within the Monroe County geographic area. The life of the expanded overlay of the new NPA over the 305 & 786 NPAs in Alternative # 3 would be reduced by approximately one-half year to provide the 4 additional years life to the seven rate centers in the Monroe County geographic area.

The exchanges in Area A, Miami-Dade County, include:

Area A Homestead Miami Perrine North Dade
Total codes at 305 Exhaust = 889
Area code life in years = 7.3 to 14.7

The exchanges in Area B, Part of Monroe County, include:

Area B Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, Sugar Loaf Key
Total codes at 305 Exhaust = 81
Area Code life in years = 12.0 to 24.0

NPA Split – Alternative # 5

At the exhaust of the 305 NPA during 1Q2000, the Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, and Sugar Loaf Key rate centers of Monroe County would be split off from the 305 NPA and assigned a new NPA. The split boundary runs along rate center boundaries near the County boundary between Monroe and Miami-Dade Counties. All codes in the New NPA will be dedicated to the seven rate centers in the Keys of Monroe County.

The exchanges in Area A, Miami-Dade County, include:

Area A Homestead Miami Perrine North Dade
Total codes at 305 Exhaust = 889
Area code life in years = 4.3 to 8.6

The exchanges in Area B, Part of Monroe County, include:

Area B Big Pine, Islamorada, Key Largo, Key West, Marathon, North Key Largo, Sugar Loaf Key
Total codes at 305 Exhaust = 81
Area Code life in years = 38.0 to 76.0

FLORIDA 305 NPA (THE KEYS) 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 | 3.4 | | 6.7 | |
| #2 | 7.8 | | 15.6 | |
| #3 | 7.8 | 8.0 | 15.6 | 16.0 |
| #4 | 7.3 | 12.0 | 14.7 | 24.0 |
| #5 | 4.3 | 38.0 | 8.6 | 76.0 |

INITIAL PLANNING DOCUMENT





FLORIDA 305 NPA (The Keys) RELIEF ALTERNATIVES

| Central Office Code (NXX) Statistics (As of May 1999 LERG) | | | | | | Forecasted Growth | | | | Alternative # 1 Expanded Overlay (786 Area Code Over Monroe County) (305 + 786 NPAs) | | | Alternative # 2 Alternative # 1 Plus Additional Overlay Over 305 & 786 (305, 786 & New NPAs) | | | Alternative # 3 NPA Split/ Expanded Overlay Area A = Miami-Dade County Area B = Part of Monroe County | | Alternative # 4 NPA Split/Expanded Overlay Area A = Miami-Dade County Area B = Part of Monroe County | | Alternative # 5 NPA Split Area A = Miami-Dade County Area B = Part of Monroe County | | |
|---|---|---|---------------------------------------|--------------------------------------|------------------------------|-------------------------------------|--------------------------------|-----------------------------------|-------------------------------------|--|--------------------------------------|--------------------------|--|--------------------------------------|--------------------------------|--|--|---|--|--|--|--|
| | | | | | | | | | | Working NXXs Total | Working NXXs Total | Working NXXs Total | Area A Total Assignables | Area B Total Assignables | Area A Total Assignables | Area B Total Assignables | Area A Total Assignables | Area B Total Assignables | | | | |
| AREA CODE | Monroe Total NXX Codes 1-1-1999 | Dade Total NXX Codes 1-1-1999 | Available NXX Codes 1-1-1999 | Total Assignables NXX Codes | Projected Exhaust Date | Number Quarters to Exhaust | One Quarter NXX Codes | Working NXXs At 305 1Q00 | Available NXXs At 305 1Q00 | Working NXXs At 305 1Q00 | Total Assignables NXX Codes | One Year Growth | Working NXXs At 305 1Q00 | Total Assignables NXX Codes | One Year Growth | Area A Total Assignables NXX Codes | Area B Total Assignables NXX Codes | Area A Total Assignables NXX Codes | Area B Total Assignables NXX Codes | Area A Total Assignables NXX Codes | Area B Total Assignables NXX Codes | |
| 305 NPA | 63 | 684 | 18 | 765 | 1Q00 | 4 | 4.5 | 765 | 0 | 765 | 765 | 18 | 765 | 765 | 18 | 765 | - | 765 | - | 765 | - | |
| 786 NPA | 0 | 52 | 728 | 780 | 2Q03 | 17 | 38.3 | 205 | 575 | 205 | 780 | 153 | 205 | 780 | 153 | 780 | - | 780 | - | 780 | - | |
| New NPA | 0 | 0 | 765 | 765 | - | - | - | 0 | - | - | - | - | 0 | 765 | - | 540 | 225 | 468 | 297 | - | 765 | |
| TOTAL CODES | 63 | 736 | 746 | 2310 | | | 43 | 970 | 575 | 970 | 1545 | 171 | 970 | 2310 | 171 | 2085 | 225 | 2013 | 297 | 1545 | 765 | |
| | | | | | | | | | | a | b | c | a | b | c | b | b | b | b | b | b | |
| Area Code Life Under Assumption #1 | | | | | | | | | | | | | | | | | | | | | | |
| d | Number of area codes serving the geographic territory | | | | | | | | | | 2 | 3 | 2.71 | 0.29 | 2.61 | 0.39 | 2 | 1 | | | | |
| e | Number of assignable NXX codes in NPAs (b) | | | | | | | | | | 1545 | 2310 | 2085 | 225 | 2013 | 297 | 1545 | 765 | | | | |
| f | Number of working NXX codes at exhaust (a) | | | | | | | | | | 970 | 970 | 889 | 81 | 889 | 81 | 889 | 81 | 889 | 81 | | |
| g | Number of available NXX codes for assignment (e - f) | | | | | | | | | | 575 | 1340 | 1196 | 144 | 1124 | 216 | 656 | 684 | | | | |
| h | Average forecasted NXX code growth per year (c) | | | | | | | | | | 171 | 171 | 153 | 18 | 153 | 18 | 153 | 18 | 153 | 18 | | |
| i | Relief alternative life in years beyond 2Q00 (g/h) | | | | | | | | | | 3.4 | 7.8 | 7.8 | 8.0 | 7.3 | 12.0 | 4.3 | 38.0 | | | | |
| | Exhaust year | | | | | | | | | | 2003.9 | 2008.3 | 2008.3 | 2008.5 | 2007.8 | 2012.5 | 2004.8 | 2038.5 | | | | |
| Area Code Life Under Assumption #2 | | | | | | | | | | | | | | | | | | | | | | |
| j | Number of available NXX codes for assignment (g) | | | | | | | | | | 575 | 1340 | 1196 | 144 | 1124 | 216 | 656 | 684 | | | | |
| k | Average forecasted NXX code growth per year (h/2) | | | | | | | | | | 86 | 86 | 77 | 9 | 77 | 9 | 77 | 9 | 77 | 9 | | |
| l | Relief alternative life in years beyond 2Q00 (j/k) | | | | | | | | | | 6.7 | 15.6 | 15.6 | 16.0 | 14.7 | 24.0 | 8.6 | 76.0 | | | | |
| | Exhaust year | | | | | | | | | | 2007.2 | 2016.1 | 2016.1 | 2016.5 | 2015.2 | 2024.5 | 2009.1 | 2076.5 | | | | |
| Assumption #1 Code growth continues at 2Q99 through 1Q00 levels | | | | | | | | | | | | | | | | | | | | | | |
| Assumption #2 Code growth reduced by 50% beyond 1Q00 | | | | | | | | | | | | | | | | | | | | | | |

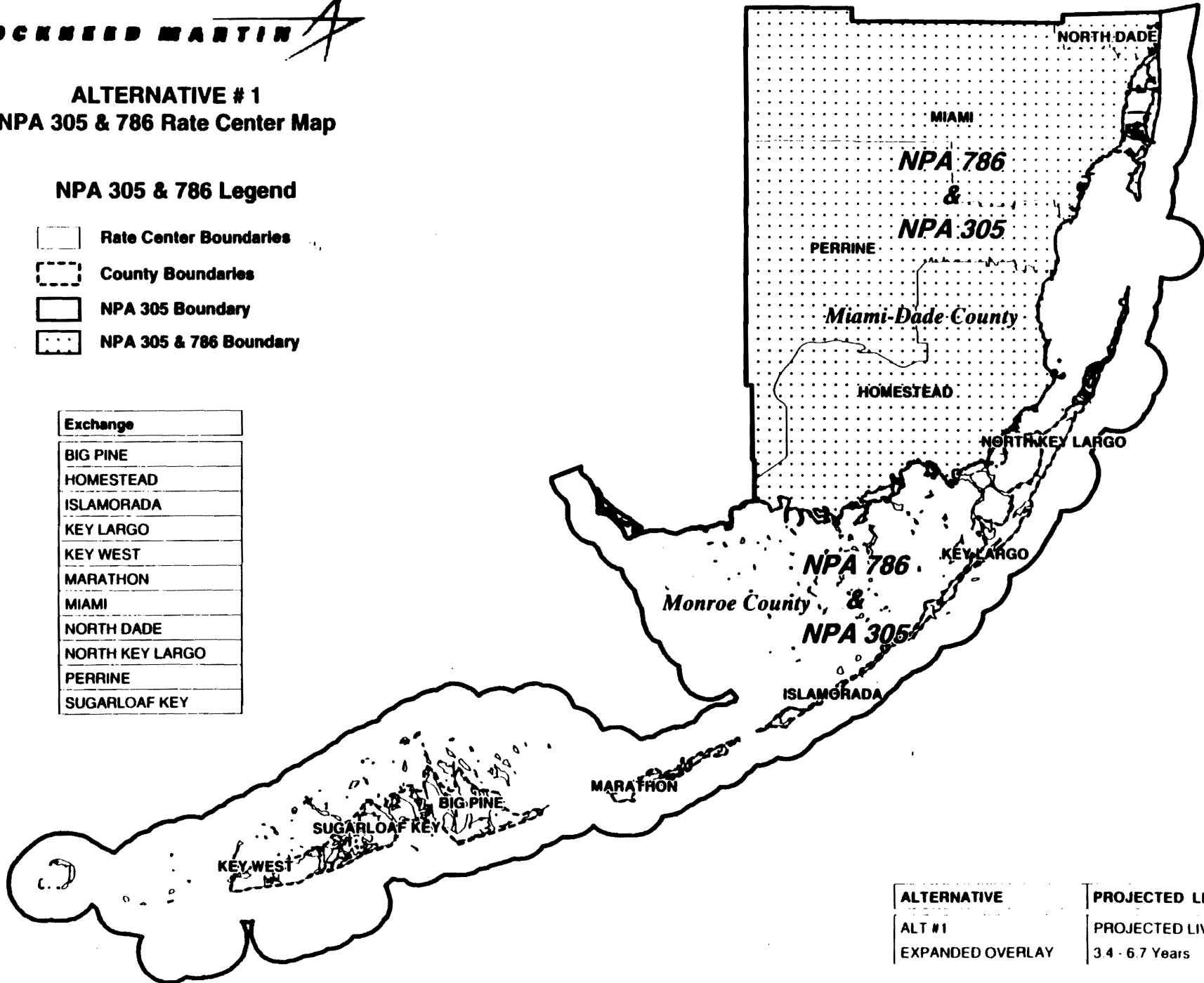


**ALTERNATIVE # 1
NPA 305 & 786 Rate Center Map**

NPA 305 & 786 Legend

-  Rate Center Boundaries
-  County Boundaries
-  NPA 305 Boundary
-  NPA 305 & 786 Boundary

| Exchange |
|-----------------|
| BIG PINE |
| HOMESTEAD |
| ISLAMORADA |
| KEY LARGO |
| KEY WEST |
| MARATHON |
| MIAMI |
| NORTH DADE |
| NORTH KEY LARGO |
| PERRINE |
| SUGARLOAF KEY |







| ALTERNATIVE | PROJECTED LIVES |
|------------------|-----------------|
| ALT #1 | PROJECTED LIVES |
| EXPANDED OVERLAY | 3.4 - 6.7 Years |

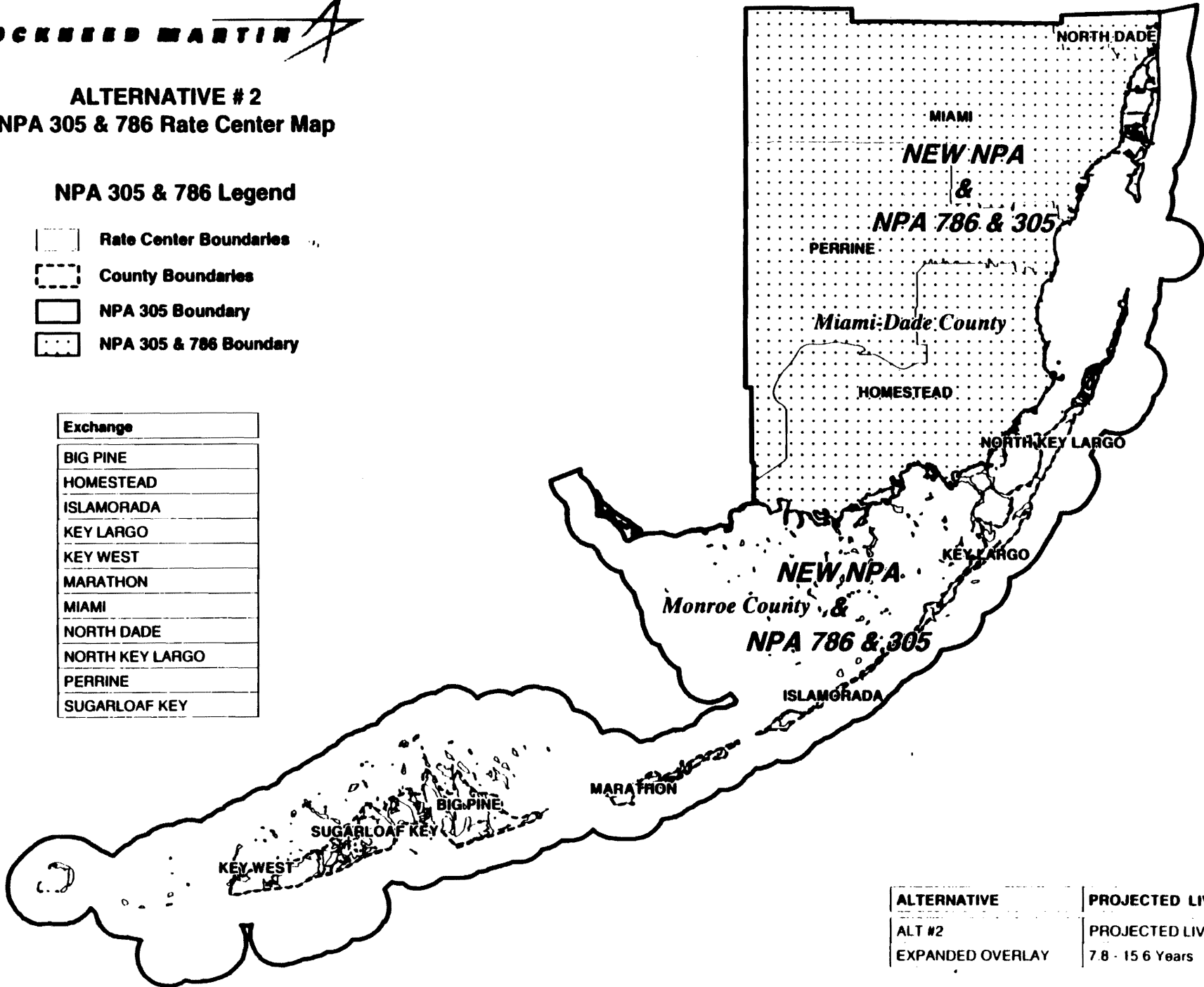


ALTERNATIVE #2
NPA 305 & 786 Rate Center Map

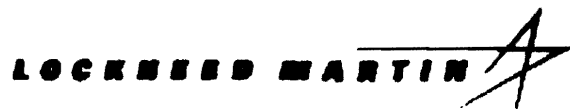
NPA 305 & 786 Legend

-  Rate Center Boundaries
-  County Boundaries
-  NPA 305 Boundary
-  NPA 305 & 786 Boundary

| Exchange |
|-----------------|
| BIG PINE |
| HOMESTEAD |
| ISLAMORADA |
| KEY LARGO |
| KEY WEST |
| MARATHON |
| MIAMI |
| NORTH DADE |
| NORTH KEY LARGO |
| PERRINE |
| SUGARLOAF KEY |







| ALTERNATIVE | PROJECTED LIVES |
|------------------|------------------|
| ALT #2 | PROJECTED LIVES |
| EXPANDED OVERLAY | 7.8 - 15.6 Years |

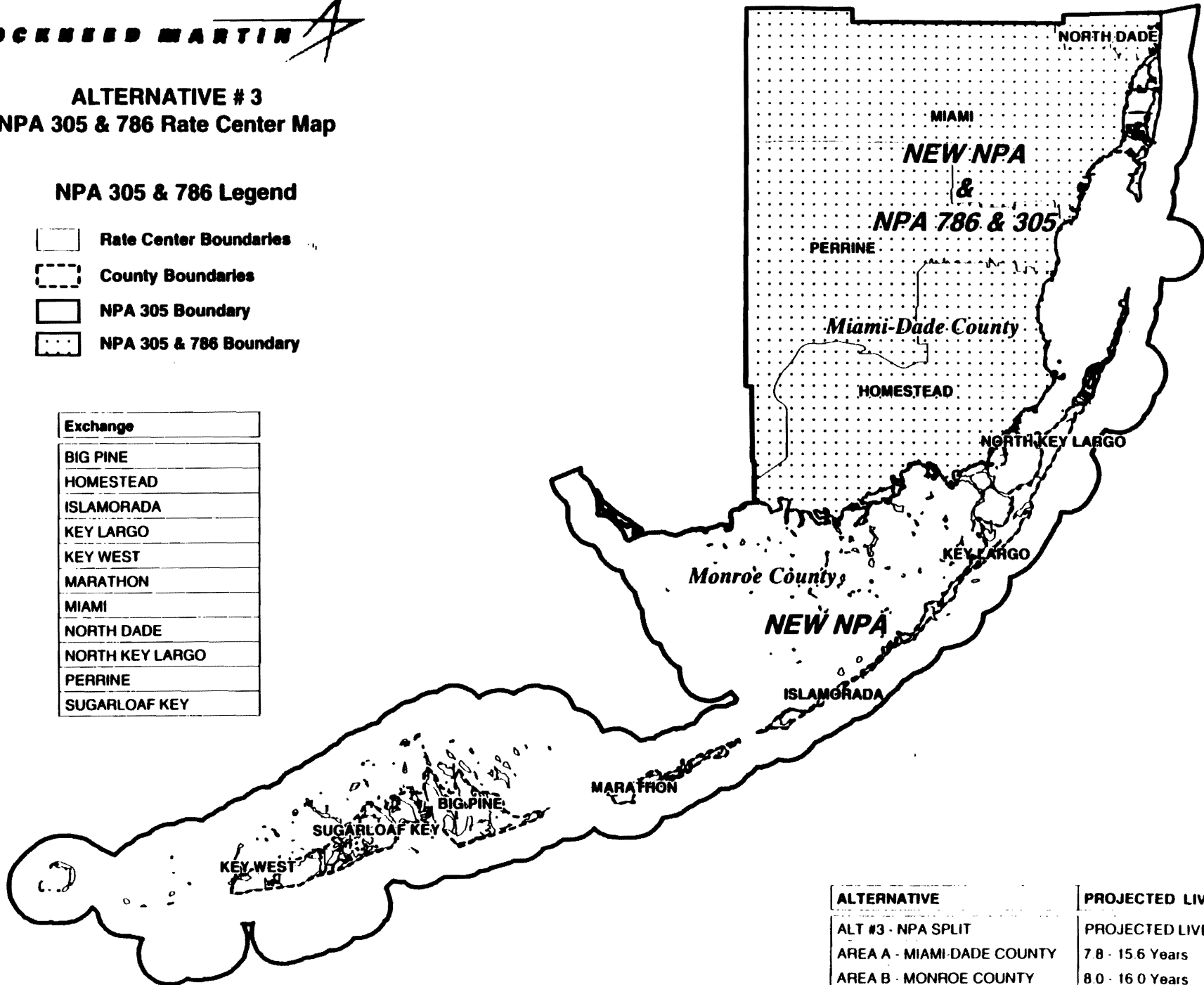


**ALTERNATIVE # 3
NPA 305 & 786 Rate Center Map**

NPA 305 & 786 Legend

-  Rate Center Boundaries
-  County Boundaries
-  NPA 305 Boundary
-  NPA 305 & 786 Boundary

| Exchange |
|-----------------|
| BIG PINE |
| HOMESTEAD |
| ISLAMORADA |
| KEY LARGO |
| KEY WEST |
| MARATHON |
| MIAMI |
| NORTH DADE |
| NORTH KEY LARGO |
| PERRINE |
| SUGARLOAF KEY |







| ALTERNATIVE | PROJECTED LIVES |
|----------------------------|------------------|
| ALT #3 - NPA SPLIT | PROJECTED LIVES |
| AREA A - MIAMI-DADE COUNTY | 7.8 - 15.6 Years |
| AREA B - MONROE COUNTY | 8.0 - 16.0 Years |

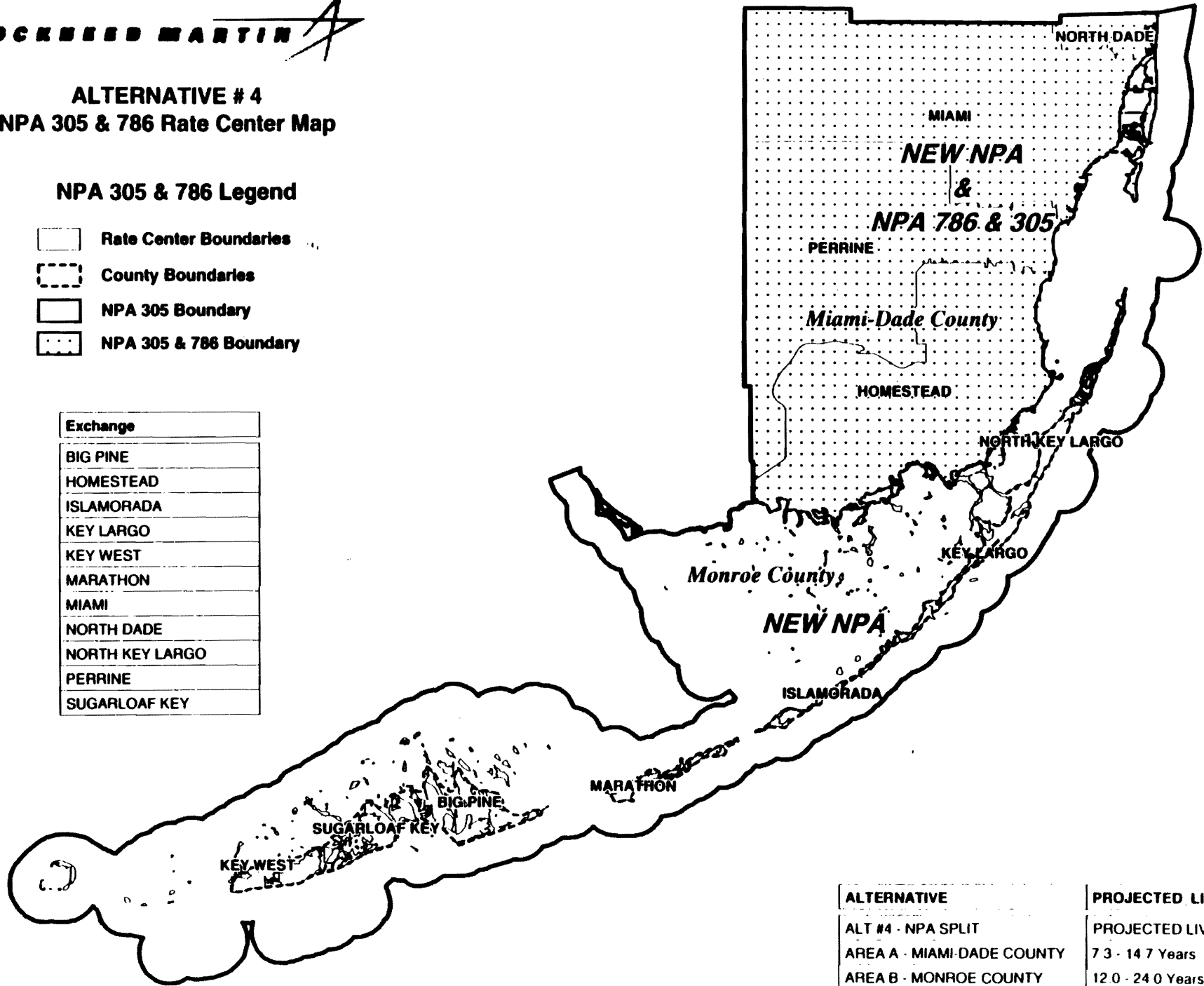


ALTERNATIVE # 4
NPA 305 & 786 Rate Center Map

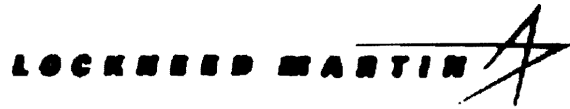
NPA 305 & 786 Legend

-  Rate Center Boundaries
-  County Boundaries
-  NPA 305 Boundary
-  NPA 305 & 786 Boundary

| Exchange |
|-----------------|
| BIG PINE |
| HOMESTEAD |
| ISLAMORADA |
| KEY LARGO |
| KEY WEST |
| MARATHON |
| MIAMI |
| NORTH DADE |
| NORTH KEY LARGO |
| PERRINE |
| SUGARLOAF KEY |







| ALTERNATIVE | PROJECTED LIVES |
|----------------------------|-------------------|
| ALT #4 - NPA SPLIT | PROJECTED LIVES |
| AREA A - MIAMI-DADE COUNTY | 7.3 - 14.7 Years |
| AREA B - MONROE COUNTY | 12.0 - 24.0 Years |

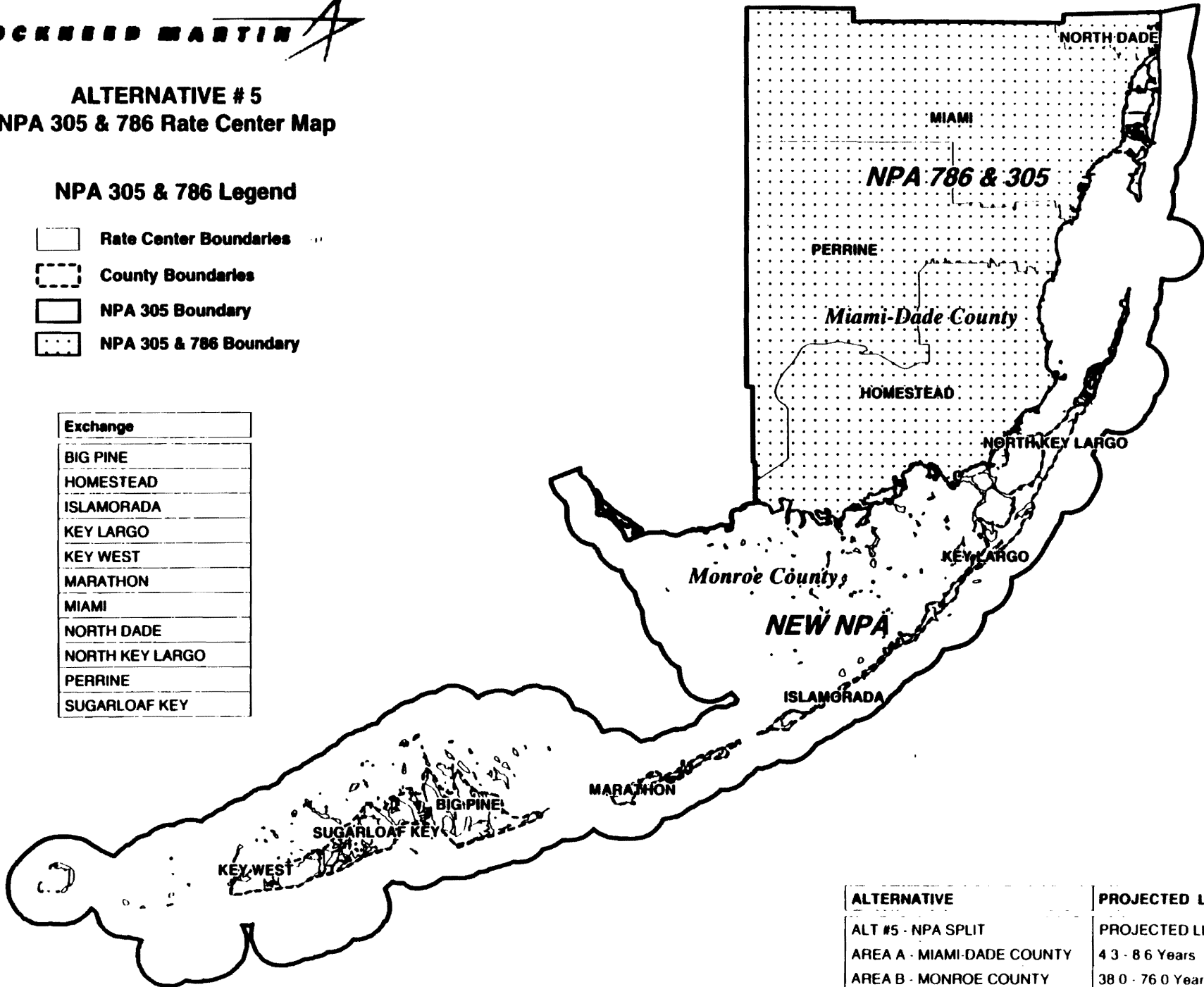


**ALTERNATIVE # 5
NPA 305 & 786 Rate Center Map**

NPA 305 & 786 Legend

-  Rate Center Boundaries
-  County Boundaries
-  NPA 305 Boundary
-  NPA 305 & 786 Boundary

| Exchange |
|-----------------|
| BIG PINE |
| HOMESTEAD |
| ISLAMORADA |
| KEY LARGO |
| KEY WEST |
| MARATHON |
| MIAMI |
| NORTH DADE |
| NORTH KEY LARGO |
| PERRINE |
| SUGARLOAF KEY |



| ALTERNATIVE | PROJECTED LIVES |
|----------------------------|-------------------|
| ALT #5 - NPA SPLIT | PROJECTED LIVES |
| AREA A - MIAMI-DADE COUNTY | 43 - 86 Years |
| AREA B - MONROE COUNTY | 38 0 - 76 0 Years |

**MEETING NOTES OF THE
305 NPA EXTRAORDINARY JEOPARDY
CONFERENCE CALL MEETING**

APRIL 23, 1999

WELCOME AND INTRODUCTIONS

Wayne Milby, Senior NPA Relief Planner – NANPA, welcomed everyone and asked the conference call participants to introduce themselves and identify the companies they represented. See Attachment #1 for the names of those who were invited and those who attended the April 23, 1999 conference call. Mr. Milby explained to participants that the conference call would follow the ATIS Consensus Process and asked if there were questions related to that format. No questions were posed.

STATUS OF 305 NPA

NANPA CO Code Administration provided detailed information regarding monthly historical CO Code assignment data and stated that 7 requests have been denied since jeopardy declaration and freeze was invoked on 3/22/99. CO Administration also provided the current total number of available codes and the number of unavailable codes, the number of rate centers, and indicated that there is the possibility that a service provider will be returning four codes.

Consensus was reached that any current available and any codes that become available will be reserved to the 7 rate centers in the Keys.

LETTER FROM FLORIDA PUBLIC SERVICE COMMISSION TO NANPA

Mr. Milby read and summarized a letter dated April 22, 1999 written to Ron Conners, Director – NANP Administration. The Commission requested that the freeze continue until such time as NANPA proposes an Initial Planning Document with alternatives to the Commission.

A proposal was made to comply with the Commission's request to extend the freeze with the exception of a new carrier with no codes associated with the rate centers in the Keys to be allocated one code. The new carrier must also meet the following criteria:

1. Certification documents are complete and interconnection agreements are finalized
2. The new carrier provides service to their customer(s) within thirty days of the effective date of the code and trunks are already in place.

Consensus was reached on this proposal and the freeze will continue until relief planning is proposed.

SPECIAL CENTRAL OFFICE CODE UTILIZATION SURVEY (COCUS) FOR FLORIDA NPAs 305 AND 786

Participants indicated that the annual COCUS recently filed did not separate forecasts from 786 NPA from 305 NPA. A request to conduct a special COCUS was granted and will be sent to existing code holders and other carriers interested in serving 305 and 786 under separate cover. The data will be compiled prior to the relief planning meeting scheduled for June 23, 1999.

NEXT MEETING AND DISTRIBUTION OF NOTES

Consensus was reached that the conference call meeting notes would not be reviewed and will be distributed no later than May 7, 1999.

Consensus was also reached that the Industry relief planning meeting will be held June 23, 1999 and the agenda will be structured to discuss relief planning for the entire day, but if time permits, a jeopardy meeting will be convened if possible the same day.

During the June 23, 1999 Industry meeting, participants agreed to postpone jeopardy discussions until the conference call to approve the relief planning meeting minutes and DRAFT Petition convened. This was scheduled for July 21, 1999. Although some discussion took place during the Industry conference call, participants reached consensus to discuss specific extraordinary code conservation measures during another conference call scheduled for August 10, 1999.

An updated list of unavailable codes for the 305 NPA has been provided (see Attachment #2) and will be discussed on August 10, 1999 along with the Extraordinary Code Conservation Measures.

Attendees and Invitees 305 NPA Extraordinary Jeopardy
 Conference Call Industry Meeting - April 23, 1999

Attachment #1
 To Exhibit B
 Page 1 of 7

| Init | Last Name | First Name | Company | Phone | Fax |
|------|------------|------------|-------------------------------|--------------|--------------|
| | Adair | Grady | GTE - Florida | 813-483-2529 | 813-223-4888 |
| | Albenco | David | All Florida Paging | 800-815-0216 | 407-260-5823 |
| | Albertson | Darren | Allegiance Telecom | 214-261-7165 | 214-461-8686 |
| | Alexander | Bridget | ITC DeltaCom | 706-645-9026 | 706-645-9077 |
| | Alexander | Steve | Peoples Telephone Compan | 305-593-9667 | 800-864-3355 |
| | Allen | William | Bell Atlantic | | 518-465-0385 |
| | Allen Jr. | Thomas E. | Intermedia Comm., Inc. | 813-621-0011 | 813-663-2312 |
| | Allington | Gary | BellSouth | 407-237-3319 | 407-237-3054 |
| | Audu | Jonathan | Flonda PSC | 850-413-6552 | 850-413-6563 |
| | Bacon | Anita | AT&T Wireless Services | 972-776-4522 | 972-776-4572 |
| | Baker | Barry | AirTouch Paging | 904-396-1510 | 904-396-4708 |
| | Ball | Carlton | GTE Florida | 813-483-2536 | 813-204-8862 |
| X | Barrett | Michael | Flonda PSC | 850-413-6544 | 850-413-6545 |
| | Beary | James | Porta-Phone Paging | 850-841-7100 | 850-561-8996 |
| | Beck | Charlie | Florida Public Service Com | | |
| | Bennett | Mary | Radiofone, Inc. | 504-830-5486 | 504-831-7859 |
| | Bennett | Bruce | Lockheed Martin-NANPA | 925-363-8701 | 925-363-8714 |
| | Benson | Al | BellSouth | 904-350-3359 | 904-355-8210 |
| | Biddix | Timothy | Intermedia Communications | 813-829-4988 | 813-829-6987 |
| | Birtwistle | Rick | AirTouch Paging | 404-878-1624 | 404-257-5066 |
| | Boger | Michael | Daytone Telephone Compa | 901-384-9100 | 901-385-7020 |
| | Bolich | Mark | AirTouch Paging | 727-572-7482 | 727-573-0329 |
| | Bonifacic | Jennifer | Alltel Communications | | 773-399-2536 |
| | Bonslow | Daniel | Tel-Save, Inc. | 215-862-1500 | 215-862-1085 |
| | Brady | Jim | Bell South Mobility | 407-771-1301 | 407-805-8914 |
| | Brannon | Debby | Teligent | 703-460-2319 | |
| X | Brantley | Mike | Arch Communications | | 770-498-3916 |
| | Brege | Jim | BellSouth Mobility, Inc. | 407-247-0002 | 407-805-8914 |
| | Brieady | Tom | TSR Paging | 619-268-5050 | 619-268-8063 |
| | Brooks | Suzanne | MCI World Com | 972-656-1430 | 972-656-1499 |
| | Brown | Bill | BellSouth Cellular Corp. | 404-249-0486 | 404-249-0453 |
| | Brown | Joy | Quincy Telephone | 850-875-5214 | 850-875-5226 |
| | Brown | Scott | MCI Metro | 404-267-5936 | 404-825-5992 |
| | Brown | Steven | Intermedia Communications | 812-829-2231 | 813-829-4923 |
| | Browne | Lydelle | Intercontinental Comm. Gro | 561-274-8044 | 561-274-3964 |
| | Brownworth | Steven | Interstate FiberNet | 706-645-8555 | 706-645-8989 |
| | Bumgarner | Jack | Central Wireless Partnershi | 559-440-0164 | 559-440-0297 |
| | Burleson | Ron | BellSouth Cellular | 404-249-0455 | 404-249-0455 |
| | Butler | Virginia | BellSouth | 904-350-3400 | 904-350-4150 |
| | Cabrera | Bill | AGR Electronics/Metro Call | 305-556-8438 | 305-827-1005 |
| | Cairon | Frank | PrimeCo PCS | 904-348-3640 | 904-348-3618 |
| | Campbell | David | Vista-United Telecommunic | 407-827-2112 | 407-827-2128 |
| | Castle | Gregory | Pacific Bell | 415-542-7083 | 415-543-2935 |
| | Chavez | John | General Paging | 305-267-5554 | 305-267-5554 |
| | Childers | Judy | BellSouth - Reg. & Ext. Affai | 305-347-5414 | 305-577-3027 |
| | Cigler | Jim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Clark | Tony | Seiko Communications Syst | 503-531-1624 | 503-531-0519 |
| | Clark | Melanie | Sprint PCS | 407-475-0616 | 407-475-0524 |
| | Climer | Tom | Intermedia Communications | 800-940-0011 | 813-829-2281 |

| Init | Last Name | First Name | Company | Phone | Fax |
|------|-------------|------------|-------------------------------|--------------|--------------|
| | Cocotta | Sue | Frontier Local Services | 716-777-1692 | 716-325-4481 |
| | Colaco | Frank | Lockheed Martin-NANPA | 973-740-9100 | 973-740-9119 |
| X | Collins | Shannon | Lockheed Martin | 925-363-8707 | 925-363-8729 |
| | Cooperman | Kenneth | BellSouth | 305-622-3250 | 305-622-3292 |
| | Cotter | Mary | Time Warner-Syracuse | 315-463-2288 | 315-463-2088 |
| X | Cox | Will | Florida Public Service Com | 850-413-6204 | 850-413-6205 |
| | Cratem | Richard | Teleco Engineer Manager | 904-348-3624 | 904-348-3818 |
| | Cutting | John | Florida PSC | 850-413-6844 | 850-413-6845 |
| | Dantley | James | IDS Telecom///Quincy | 850-875-5205 | 850-875-5226 |
| | Darnutzer | Ron | Meretel Communications | 318-421-6215 | 318-421-6233 |
| X | Davi | Anthony | Lockheed Martin -NANPA | 925-363-8705 | 925-363-8714 |
| | Davidson | Darcy | SEIKO Communications Sy | 503-531-1624 | 503-531-0519 |
| | Day | Steven | Metrocall | 703-660-6677 | 703-765-4385 |
| | Deese | Elaine | Alltel Communications, Inc. | 704-845-7290 | 704-845-7229 |
| | Deweese | Robert | Peabody & Brown | 617-345-1316 | 617-345-1300 |
| | Dixon | MaryAnn | Sprint | 407-889-1330 | 407-884-1978 |
| | Dolensky | Ed | BellSouth Industry Relations | 205-321-2010 | 205-321-4754 |
| | Downs | Jena | Bell Atlantic | 410-736-6711 | 410-736-6066 |
| | Duff | Jason | Sprint | 407-889-6807 | 407-884-0206 |
| | Duplechin | Derrel | Columbia Telecom, Inc. | 504-927-6815 | 504-927-6818 |
| | Edwards | Toni | Vista Untied | 407-827-2004 | 407-827-2220 |
| | Eicholz | Kathy | Sprint Communications | 913-534-2605 | 913-534-5366 |
| | Eldredge | Paul | Comay Telco Inc. | 508-390-9000 | 516-794-1742 |
| | Eiter | Jim | PageNet | 908-541-6151 | 908-541-6150 |
| | Eudy | Harriet | Alltel | 904-364-2517 | 904-364-2474 |
| | Faul | Kelly | MCI World Com. | 703-918-0457 | 703-918-6814 |
| | Fields | Helen | CONXUS Network, Inc. | 864-241-5412 | 864-241-8197 |
| | Figlioli | Vito | Sprint PCS | 813-639-2023 | 813-639-2050 |
| | Flaherty | Reva | Bell South | 305-347-5405 | 305-577-3027 |
| | Flores | Adrienne | AT&T Wireless | 201-291-8067 | 201-291-8044 |
| X | Foley | Thomas | Sprint | 407-889-6168 | 407-884-1919 |
| | Fondren | John H. | Hart Communications | 912-242-3237 | 912-242-5363 |
| | Fordham | Lee | Florida Public Service Com | 850-413-6226 | 850-413-6227 |
| | Foss | L.Theodore | Newport Telephone Co. Inc | 315-845-8112 | 315-845-8662 |
| | Frazee | George | BellSouth - Reg. & Ext. Affai | 850-224-5139 | 850-222-8640 |
| | Frederckson | Jim | Bravo Cellular, L.L.C. | | |
| | Fredlund | Andy | Arch Communications | 561-912-7410 | 561-912-7450 |
| | Fry | Terry | City of Lakeland | 941-499-8760 | 941-499-8761 |
| | Gadbois | Steve | Arch Communications | 704-341-5131 | 704-544-0103 |
| | Gaffney | John | Nextel | 914-448-4309 | 914-421-2700 |
| | Gagneaux | Lew | BellSouth Public Comm. Inc | 205-943-2620 | 205-943-2508 |
| | Gallagher | Josephine | Bell Atlantic | 703-974-8160 | 703-974-0616 |
| | Gerstemeier | Richard | Time Warner AXS of Florida | 407-215-6800 | 407-215-6803 |
| | Gifford | Jennifer | Nextel | 617-839-5622 | 617-839-5912 |
| | Glover | Joanne | BellSouth | 904-350-3743 | 904-350-4150 |
| | Goette | Fred | G.B.F.A.N | 912-746-1372 | 912-746-1373 |
| | Gonos | Daniel | Winstar | 248-539-7877 | 248-539-7879 |
| | Gonzalez | Izzy | MediaOne | 904-619-3323 | 904-619-3355 |
| | Gonzalez | Julian | Beep-Net | 305-388-3100 | 305-388-9130 |

| Init | Last Name | First Name | Company | Phone | Fax |
|------|-------------|------------|-----------------------------|--------------|--------------|
| | Gonzalez | Daniel | NEXTLINK Communication, | 202-721-0999 | 202-721-0995 |
| | Goodell | Paul | Priority Communications | 561-750-8899 | 561-391-4705 |
| | Gooden | Debra | MCI | 972-656-5575 | 972-656-1499 |
| | Goodgine | Janice | Bell South | 205-977-0741 | 205-977-7877 |
| | Goodroe | Lynn | MCI World Com | 601-460-8852 | 601-460-8864 |
| | Graham | Mildred | Sprint | 407-889-6102 | 407-884-0206 |
| | Grant | Dennis | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| | Gray | Bob | BellSouth Long Distance, In | 770-352-3021 | 770-352-3184 |
| | Gray | Eddie | GTE Wireless | 678-339-4412 | 678-339-8572 |
| | Green | Barbara | Sprint | 407-889-1330 | 407-884-1978 |
| | Greene | Linda | Bell Atlantic | 410-736-6828 | 410-736-6066 |
| | Greer | Stan | BellSouth Telecommunicatio | 850-224-5139 | 850-224-5073 |
| | Griffith | Georgia | Media One d/b/a Amer Ca S | 914-762-8684 | 914-762-0799 |
| | Guanglia | Annette | MCI | 914-312-2287 | 914-312-2287 |
| | Guepe | Richard | AT & T | 404-810-7389 | 404-810-5901 |
| | Guerrero | Rick | Cox California Telcom | 949-716-2024 | 949-716-2007 |
| | Hager | Doug | Alltel Communications, Inc. | 704-845-7275 | 704-845-7382 |
| | Haines | Carmen | Excel Communications | 972-588-4714 | 972-588-4951 |
| | Hancock | Hershel | GTE Mobilnet of Tampa, Inc | 813-282-6417 | 813-620-4124 |
| | Harshbarger | A. L. | GTE | 813-483-2541 | 813-204-8862 |
| | Hartman | Ken | Bell South Telecom, Inc. | 404-927-8670 | 404-524-2918 |
| | Hartsfield | Don | Arrow Communications/ITS | 561-597-2827 | 561-597-2110 |
| X | Hatch | Alice | Omnipoint | 954-457-5744 | 954-457-5705 |
| | Hatfield | Steven | ATTWS | 941-551-4055 | 941-551-4033 |
| | Hatton | Ron | GTE Florida | 813-483-3912 | 813-204-8857 |
| | Hayes | Sheila | Sprint | 913-534-2623 | 913-534-5366 |
| | Heaton | Francis | Wireless One Network L.P. | 941-489-1600 | 941-489-1622 |
| | Henderson | Anne | AT&T | 404-810-8913 | 404-810-6422 |
| | Higgins | Jeannine | Bell Atlantic | | 716-842-7090 |
| X | Hiltz | Cara | Adelphia Business Solutions | 412-220-5083 | 412-220-5164 |
| | Hobson | Elizabeth | BellSouth Mobility, Inc. | 407-771-1321 | 407-805-8914 |
| | Hogan | Jeff | Teleport Communications | 718-355-2797 | 718-355-4804 |
| | Hogue | John | Sprint | 913-624-6016 | 913-624-5504 |
| | Holmes | Dennis | OpTel, Inc. | 214-634-3842 | 214-634-3837 |
| | Holt | Lew | Aerial Communications | 813-243-3224 | 813-243-1906 |
| | Hopfer | Bill | Continental FL Telecom | 904- | 904-731-8699 |
| | Horton | Chris | AirTouch Cellular | 404-257-5314 | 404-257-5066 |
| | Hoskins | Ann | Bell Atlantic - Legal Dept. | 212-395-6511 | 212-768-7568 |
| | Hunter | Dena | Media One | 303-705-5145 | 303-790-1094 |
| | Huntley | David | Cellular One | 617-462-5094 | 617-462-5024 |
| | Hutchison | Kim | AT&T | | |
| | Huttenhower | Bill | Vista United | 407-827-2182 | 407-827-2424 |
| | Hymans | Linda | Lockheed Martin-NANPA | 512-331-0751 | |
| X | Ileri | Levent | Florida Public Service Com | 850-413-6562 | 850-413-6563 |
| | Imbag | Jennifer | TSR Wireless LLC | 818-346-0611 | 818-346-1543 |
| | Irwin | Chris | Aerial Communications | 773-399-8843 | 773-864-9235 |
| | Israel | Susan | BellSouth Cellular | 404-249-0478 | 404-249-0453 |
| | Jackson | Lester | Allsafe Paging | 904-268-7233 | 904-268-4504 |
| | James | Michelle | MCI WorldCom | 616-224-4603 | 616-224-5110 |

| Init. | First Name | Last Name | Company | Phone 1 | Phone 2 |
|-------|-------------|------------|-------------------------------|--------------|--------------|
| X | Jardon | Mario | BellSouth Mobility | 561-995-3583 | 561-988-2729 |
| | Jobe | Jack | Dynatel Paging | 904-730-6000 | 904-730-2012 |
| | Johnson | Jeanne | Sprint | 407-830-3044 | 407-884-1978 |
| | Jordan | Paula | AirTouch Cellular | 925-279-6033 | 925-279-6621 |
| | Kelly | Lonnie | Foothills Rural Telephone C | 606-297-3501 | 606-297-2000 |
| | Kennicott | Deborah | AT&T - Wireless | 773-695-2171 | 773-695-2190 |
| X | Kenworthy | Pamela | Lockheed Martin- NANPA | 973-267-7812 | 973-267-7921 |
| | Key | Tony | Sprnt Communications | 404-649-5144 | 404-649-5174 |
| | Khazraee | Sandy | Sprnt | 850-847-0173 | 850-878-0777 |
| | Kim | Donna | Accutel Comm., Inc. | | |
| | Kimmell | Beth | Sprint | 816-559-5023 | 816-559-5093 |
| | Kinlen | Charlene | BellSouth | 561-468-5540 | 561-464-4137 |
| | Kittrick | Kathleen | Vanguard Cellular Systems | 717-319-4446 | 717-579-4060 |
| | Klugerman | Paul | ABC Paging | 305-621-6000 | 305-521-4475 |
| | Krug | John | AT&T | 718-355-2762 | 718-355-4804 |
| | Kwon | Rhea | Allegiance Telecom | 312-228-6192 | 312-228-6180 |
| | LaCava | Julie | Bell Atlantic | 518-396-1046 | 518-465-8488 |
| | Langford | Thomas | Mercury Paging & Comm. | 914-471-0833 | 518-677-9510 |
| | Lanning | Keri | Intermedia Communications | 813-829-6605 | 813-829-2281 |
| | LaPlante | Doug | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| | Lee | Steven | Airsignal of California, Inc. | 310-641-2366 | 310-641-2342 |
| | Lee | David | Allsafe Paging | 904-268-1111 | 904-268-4504 |
| | Lewis | Charles W. | Nextlink | 305-626-2808 | 305-626-9602 |
| | Lewis | Charles M. | BellSouth | 404-927-2047 | 404-873-0432 |
| | Lezcano | Ed | Rainbow Paging | 305-593-7711 | 305-593-8844 |
| | Lipsky | Ted | Rainbow Paging | 305-594-7711 | 305-593-8844 |
| | Locke | Jerry | Orlando Tel. Co. | 407-996-8900 | 407-996-8901 |
| | Logering | Dennis | American Paging | 813-288-9497 | 813-289-3966 |
| X | Ludwikowski | Scott | Sprint Spectrum PCS | 913-315-2611 | 913-315-2532 |
| | Lukowski | Raymond | WinStar Telecommunication | 703-645-5466 | 703-645-5704 |
| | Lunceford | Gene | BellSouth | 205-321-2013 | 205-321-4754 |
| | Luttrell | Steve | Vista United | 407-827-2232 | 407-827-2600 |
| | Mallicote | Brenda | GTE Wireless | 813-282-6144 | 813-282-6040 |
| | Mangelo | Richard | ATT Local | 732-771-2690 | 908-771-8268 |
| | Marchant | Dick | Intermedia Communications | 813-829-4020 | 813-829-5722 |
| | Marshall | Fred | DataCom | 318-234-3438 | 318-269-1284 |
| | Martin | Charles | BellSouth Long Distance Inc | 770-352-3249 | 770-352-3184 |
| | Martin | Michael | Aerial Communications | 813-243-3217 | 813-243-1906 |
| | McCallen | Ray | BellSouth Telecommunicatio | 205-321-8906 | 205-321-4754 |
| | McCarthy | Angela | MapMobile Communications | 757-424-1191 | 757-578-4963 |
| | McCartney | Joe | AGR/Pronet Paging Inc. | 727-572-6646 | 727-573-7844 |
| | McClellan | Garry | West KY Rural Telephone | 502-874-1000 | 502-856-3313 |
| | McCullough | Douglas A. | BellSouth Telecommunicatio | 205-977-5069 | 205-977-7877 |
| X | Meins | Charlene | AT&T Wireless | 425-580-8132 | 425-806-3662 |
| | Meldazis | Daniel | Focal Communications Corp | 312-895-8272 | 312-895-8403 |
| | Merrill | J.B. | BTI | 919-510-7270 | 919-510-7239 |
| | Merriman | Rebecca | BellSouth | | |
| | Merritt | Garey | PageNet of America | 407-649-8007 | 407-872-3808 |
| | Messer | Steve | Alltel | 850-845-4050 | 850-847-4671 |

| Init | Last Name | First Name | Company | Phone | Fax |
|------|---------------|------------|------------------------------|--------------|--------------|
| X | Milby | Wayne | Lockheed Martin-NANPA | 804-795-5919 | 804-795-5514 |
| | Milchuck | Kim | Adelphia Business Solutions | 814-260-6901 | 814-260-6867 |
| | Mitchell | Tim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Monagle | Dan | Bell Atlantic | 215-963-6004 | 215-563-2658 |
| | Mosca | Paul | Cellular One | 617-462-7048 | 617-462-5975 |
| | Mostrom | Eric | Norcom, Inc. | 561-392-2550 | 561-392-0716 |
| | Murray | Melissa | KMC Telecom | 770-638-2485 | 770-806-4988 |
| | Murray, III | John J. | Payphone Consultants, Inc. | 954-484-2500 | 954-714-0005 |
| X | Nanos | Janet | Omnipoint Communications | 973-290-2513 | 973-290-2445 |
| | Newkirk | Terry | Time Warner | 303-566-5954 | 888-329-0668 |
| | Nobles | Deborah | Northeast Florida Telephone | 904-259-0639 | 904-259-7722 |
| | Nugue | Carlos | PrimeCo Personal Communi | 561-995-5723 | 561-995-5514 |
| | Packer | Howard | BellSouth Mobility | 954-850-6400 | 954-850-6400 |
| | Parker | Dennis | UNICOM Communications, | | |
| | Paswaters | Shirley | Level 3 Communications | 303-635-9602 | 303-635-9530 |
| | Pendleton | Charles | CAP Management, Inc | 606-432-0720 | 606-433-0500 |
| | Phillips | Bubba | AT&T Long Distance | 770-785-5773 | 770-929-4348 |
| | Potter | Paul | Time Warner Telecom | 407-215-6850 | 407-215-6801 |
| | Prefer | John | Priority Communications | 561-750-8899 | 561-391-4705 |
| | Pressler | Dave | Communications, Inc. | 800-476-3427 | 334-626-3171 |
| | Queenin | Larry | BellSouth | 954-742-1389 | 954-746-0862 |
| | Randall | Jacqueline | Level 3 Communications | 303-635-9603 | 303-635-9530 |
| | Rehwinkel | Charles | Sprnt Florida | 850-847-0244 | 850-878-0777 |
| | Reichenberger | Tom | Aenal Communications | 813-243-3205 | 813-243-1906 |
| | Reid | Sean | Metrocall | 850-438-1653 | 850-432-9208 |
| | Renna | Diane | AT&T Local | 908-234-7347 | 908-234-7246 |
| | Reuter | Larry | US Cellular | 352-665-4332 | 652-665-4492 |
| | Rios | Mireya | PageMart | 214-765-3853 | 214-765-4981 |
| | Ripper | Elder | Telephone Company of Cen | | |
| | Roberts | Sherita | LDDS WorldCom | 918-590-8529 | 918-590-5598 |
| | Rosario | Reggie | Paging Network of Tampa | 813-873-8400 | 813-876-3710 |
| | Ross | Cathy | Citizens Communications | 214-365-3340 | 214-365-4059 |
| | Rowland | Tom | North Central Tel. Coop. | 615-666-2151 | 615-666-6772 |
| | Rush | Lee | Altel | | |
| | Rutherford | Pam | Altel Florida | 704-845-7196 | 704-841-3231 |
| | Ryan | William | Cable Vision of New York Ci | 718-991-8000 | 718-378-2625 |
| | Sadler | Harry | GTE Florida | 813-483-2005 | 813-228-8733 |
| | Salpietra | Carl | Nextel | 407-948-2142 | 407-667-1240 |
| | Sanders | John | Preferred Networks, Inc. | 770-582-3723 | 770-734-0936 |
| | Sawyer | Bill | BellSouth | 904-350-4541 | 904-355-8210 |
| | Schiltz | Jeanne | TPS Telecom | 608-664-4236 | 608-664-4225 |
| | Schreier | Fran | Sprint PCS | 816-559-5290 | 816-559-5093 |
| | Schwartz | Mike | General Comm.&Elec. Corp | 516-501-0466 | 516-501-0464 |
| | Scobie | Michael | GTE | 813-483-2530 | 813-223-4888 |
| X | Serenci | John | Bell South | 954-928-4710 | 354-772-5105 |
| | Shapiro | Phil | AT& Comm. Of NY Inc. | 518-463-2555 | 518-463-5943 |
| | Sheets | Scott | Airtouch Paging | 972-860-3353 | 972-860-3248 |
| | Shoenfelt | Terry | Strategic Technologies, Inc. | 305-229-6591 | 305-229-6580 |
| | Sidelia | Brian | Adelphia Business Solutions | | |

| Link | Alt | Name | First Name | Company | Phone | Phone |
|------|-----|------------|------------|-----------------------------|--------------|--------------|
| | | Simona | Miles G. | BellSouth Mobility | 561-477-4411 | 561-477-4411 |
| | | Sinha | Vijay | Aerial Communications | 773-399-7508 | 773-864-9337 |
| | | Slavik | Ron | AT & T Wireless | 407-667-5682 | 407-875-0422 |
| X | | Smith | Dana | PrimeCo Personal Communi | 817-258-1036 | 817-258-1805 |
| | | Snider | Vicki | BST Infrastructure Planning | 954-928-4740 | 954-772-5105 |
| | | Snyder | Bob | Pagemart, Inc. | 214-765-4209 | 214-765-4981 |
| | | Stedie | Mazen | Pager One of Florida, Inc. | 561-687-8400 | 561-687-1235 |
| | | Stephenson | Suzannee | BellSouth Mobility, Inc. | 407-771-1311 | 407-805-8914 |
| | | Stevens | Aloha | Citizens Communication | 801-553-0274 | 801-553-0905 |
| | | Stipe | Bill | ACSI of AL | 301-617-4220 | 301-483-7667 |
| | | Struthers | Brent | Lockheed Martin-NANPA | 847-836-0785 | 312-814-1818 |
| | | Sullivan | John G. | Eastern Telelogic Corp. | 610-992-8556 | 610-337-1444 |
| | | Tapia | Larry | GTE Florida | 813-483-2188 | 813-221-8103 |
| | | Tatem | Tim | BellSouth Mobility, Inc. | 407-719-0010 | 407-805-8914 |
| | | Taulbee | Kathy | Sprint | 407-889-1592 | 407-884-0206 |
| | | Taylor | Greg | Digiph | 770-446-5020 | 770-446-5035 |
| | | Telecom | Manager | Group Long Distance Inc. | | |
| | | Telecom | Manager | Intotech, L.C. | | |
| | | Thakur | Tony | Time Warner Telecom | 407-215-6800 | 407-215-6803 |
| | | Thomas | Denise | MCI WorldCom | 925-824-2007 | 925-244-1300 |
| | | Thomas | Bill | GT Com | 850-229-7222 | 850-227-7366 |
| | | Thomas | Steve | GTE Florida | | |
| | | Thompson | Leon | Nextel Communications | 770-326-7965 | 770-326-7966 |
| | | Thompson | Doug | Ameripage, Inc. | 305-231-8008 | 305-827-4906 |
| | | Tinsley | Charles | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | | Tirador | Judy | Omnipoint Communications | 973-290-2411 | 973-290-2445 |
| | | Tolliver | Ron | Intermedia Communications | 813-744-2438 | |
| | | Tomblin | Jeff | Paging Network, Inc. | 972-985-5162 | 972-985-6519 |
| | | Toolsie | Ramesh | Primeco | | |
| | | Twombly | Dana | Utilities, Inc. | 207-642-7208 | 207-642-3095 |
| | | Ude | Harriott | Alltel | | |
| | | Upton | Jodi | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | | Valdez | Ed | Teligent | | |
| | | Valenzi | Steven | Sprint Spectrum L.P. | 954-423-5250 | 954-423-5267 |
| | | Van Allen | Eric | Palmer Cellular | | 912-650-7321 |
| | | Van Brown | Barbara | MGC Communications, Inc. | 702-310-4242 | 702-310-5712 |
| | | Van Dyke | Robert | Intermedia Communications | | |
| | | Van Leer | Dave | Bell South | 904-350-2167 | 904-358-1060 |
| | | Vaughn | John H. | St. Joseph Tel. Co. | 850-229-7221 | 850-229-8689 |
| | | Wail | Billy | AirTouch Paging | 407-741-5581 | 407-740-7624 |
| | | Walsh | Tucker | MCTA | | 601-352-2280 |
| | | Waters | Ron | GTE Florida | | |
| | | Watkins | Daryl | GTE Wireless | 813-262-6431 | 813-620-4124 |
| | | Watson | Dana | PrimeCo Personal Communi | 817-258-1270 | 817-258-1243 |
| | | Watson | James C. | Z- Tel, Inc. | 941-540-8440 | 941-542-4408 |
| | | Watson | Dana | PrimeCo Personal Communi | 817-258-1270 | 817-258-1243 |
| | | Wax | Dennis | Bell Atlantic | 518-396-1020 | 518-465-8488 |
| | | Weeks | Rick | BellSouth | 954-928-4737 | 954-492-1752 |
| | | Weibaum | Deana | City of Lakeland | 941-499-6803 | 941-499-8821 |

| | | | | |
|----------|-----------|-----------------------------|--------------|--------------|
| Wheaton | Thomas | Cellular One | 617-462-5081 | 617-462-5038 |
| Whipple | Larry | BellSouth | 305-622-3263 | 305-622-3292 |
| Wickham | Jennifer | Goetek Communications, In | 201-930-5187 | 201-930-0287 |
| Wieners | Paul | CTC Communications | 781-466-1231 | 781-466-1263 |
| Wiggins | Patnck K. | Telephone Co. of Central Fi | | |
| Wiginton | Bill | Pagenet | 972-801-8051 | 972-801-8966 |
| Willer | Jackie | Vescio - MGC | | |
| Williams | Fredenck | MCI WorldCom | 972-656-1816 | 972-656-1499 |
| Williams | Terry | Nextel Communications | 407-948-2145 | 407-667-1240 |
| Williams | Lloyd | Super Telecom | 305-476-4240 | 305-443-1078 |
| Willis | Betty | Airtel | | |
| Willis | Eleanor | Winstar Telecommunication | 202-530-7656 | 202-530-0977 |
| Wooten | Kristy | Mobil Comm | 601-977-1575 | 601-977-1748 |

**UNAVAILABLE CODES
FOR THE 305 NPA (FLORIDA)**

| CODE | STATUS | REMARKS |
|-------------|---------------|-----------------------|
| 330 | UNAVAILABLE | PAY PER VIEW |
| 200 | TEST | |
| 320 | TEST | PLT TEST DIAL UP TONE |
| 561 | PROTECTED | ADJACENT NPA |
| 809 | PROTECTED | CARIBBEAN NPA |
| xxx | | Future NPA |
| xxx | | Future NPA |

305 NPA
Florida
Jeopardy Procedures

DRAFT

Extraordinary Code
Conservation Measures

(Split or Overlay)

**305 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 | 3/22/99 |
| B. | Start Date of these Extraordinary Code Conservation Measures | mm/dd/yy (Note 1) |
| C. | Estimated/Actual Number of Months From Start of "Extraordinary Measures" to Start of "Mandatory Dialing" | |
| | | |

Table 1 Notes:

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

**305 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"): | "n" codes per month (See Note 1) |
| B. | Maximum requests that may be submitted per month ("monthly submissions"): | "n" 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 Month (NANPA decision) 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> mm/dd/yy (industry decision) 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: | 10th business day after close of submission interval... 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 (e.g., one- versus two-"pool"): | Industry Option (See Note 8) |
| J. | When to submit "special" post-relief requests: | "Special" request requirements are identified on Table 5 |

** "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)

**305 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 via conference call approximately "x" months after these extraordinary measures have been implemented. 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)

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

- 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.

**305 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.

**305 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 "n" 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 and the Part 1 is received before the allowed submission date

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.

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

8) One- versus two-“pool” Industry Options (Ref. Table 2, Note 8)

The industry relief planning team must decide how initial, growth and “new application” code requests will be rationed and allocated. *Two possible options are listed below.*

- 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.
- b) ***There will be two “pools”*** from which NXX code assignments will be made; one “pool” will be for initial codes; the other “pool” will be for growth codes.
 - i) A distinction will be made as to whether an applicant is an existing service provider or a new market entrant.
 - ii) A distinction will be made as to whether a request is for an initial code, growth code or “new application” (i.e., “specialized use”) of a code.
 - iii) The industry planning team for this NPA will determine whether “new application” requests are to be classified as “initial” or “growth” for purposes of making NXX code assignments under these jeopardy procedures.
 - iv) The industry planning team for this NPA will determine the criteria that is to be applied in determining what constitutes an “initial” or “growth” for purposes of making NXX code assignments under these jeopardy procedures.
 - (1) If applicant already has an NXX code assigned to a given switch regardless of the rate center(s) served
 - (2) If applicant already has an NXX assigned to serve a specific Rate Center regardless of the serving switch(es)
 - (3) If applicant already has an NXX assigned to a given switch, to a specific Rate center, or to a given switch/rate center combination, but is requesting a new code in any of these to in order to provide either a separate and distinct service (e.g., access to internet) or to serve a specific class of customer (e.g., entire NXX will be dedicated to one customer)

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

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**

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 additional codes.

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

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 align="center">Industry Option</p> <p>Refer to details in "Priority Numbers Option" below</p> |

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

Priority Numbers Option

The industry relief planning team must decide upon the method by which code requests that do not receive an assignment in the lottery will be handled. *Two possible options are listed below.*

- 1) OCNs that do not receive a code in a given month's lottery will have to resubmit a new Part 1 code request if the OCN still needs an NXX assignment; Priority Numbers will NOT be assigned with this option.
- 2) 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.

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

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.

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” (set-aside) pool.
- 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 5.
2. If the State Commission NPA Relief Order specifies implementation dates that are different from those initially proposed by the industry relief planning team.

CERTIFICATE OF SERVICE

I, James S. Bucholz, do certify that the foregoing **PETITION FOR APPROVAL OF NPA RELIEF PLAN FOR THE 305 AREA CODE** was delivered, via U.S. Mail, this 3rd day of August, 1999, to the following:

Ms. Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Angela Green, General Counsel
Florida Public Telecommunications Assoc.
125 S. Gadsden St., #200
Tallahassee FL 32301-1525

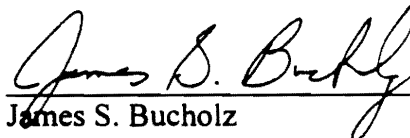
D. Bruce May, Jr.
Counsel for Florida Cellular Service, Inc.
d/b/a Bellsouth Mobility
Holland & Knight, LLP
P.O. Drawer 810
Tallahassee, FL 32302

Floyd Self
Messer, Caparello & Self
P.O. Box 1876
Tallahassee, FL 32302

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Kenneth Hoffman
Counsel for Omnipoint Communications
Rutledge, Ecenia, Underwood, Purnell &
Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Charles J. Beck
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400


James S. Bucholz

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

990456-TL
990457-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

Enclosures

dc-165458

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
08108 JUL-7 99
FPSC-RECORDS/REPORTING

**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.

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

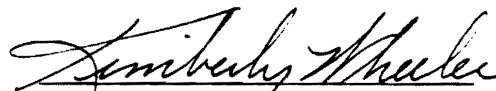
For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests the Commission to implement individual all services distributed overlays as the means of relief for the 561 and 954 NPAs. The Industry will begin implementing NPA relief once the Commission has issued a final order approving 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 <u>submission deadline</u> 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

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

****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 | <p>Priority Numbers will be used</p> <p>Refer to details in "Priority Numbers"</p> |

**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 | 2nd- and nth-choice code requests will be denied | Each OCN receives one NXX assigned to their 1st-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" |

**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, Suzanne | 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

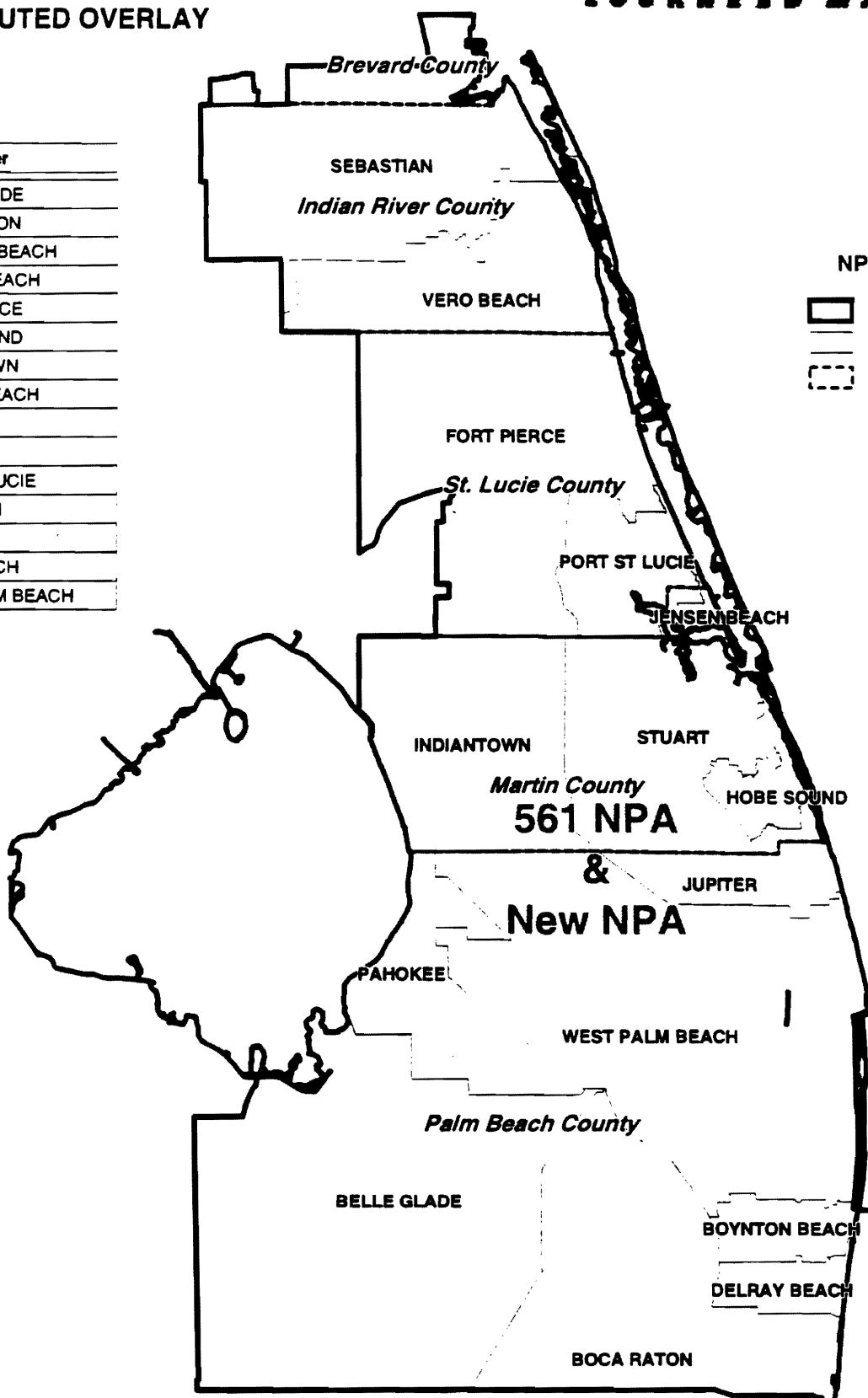
**NPA 561 Rate Center Map
 Alternative # 1
 DISTRIBUTED OVERLAY**



| 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 |

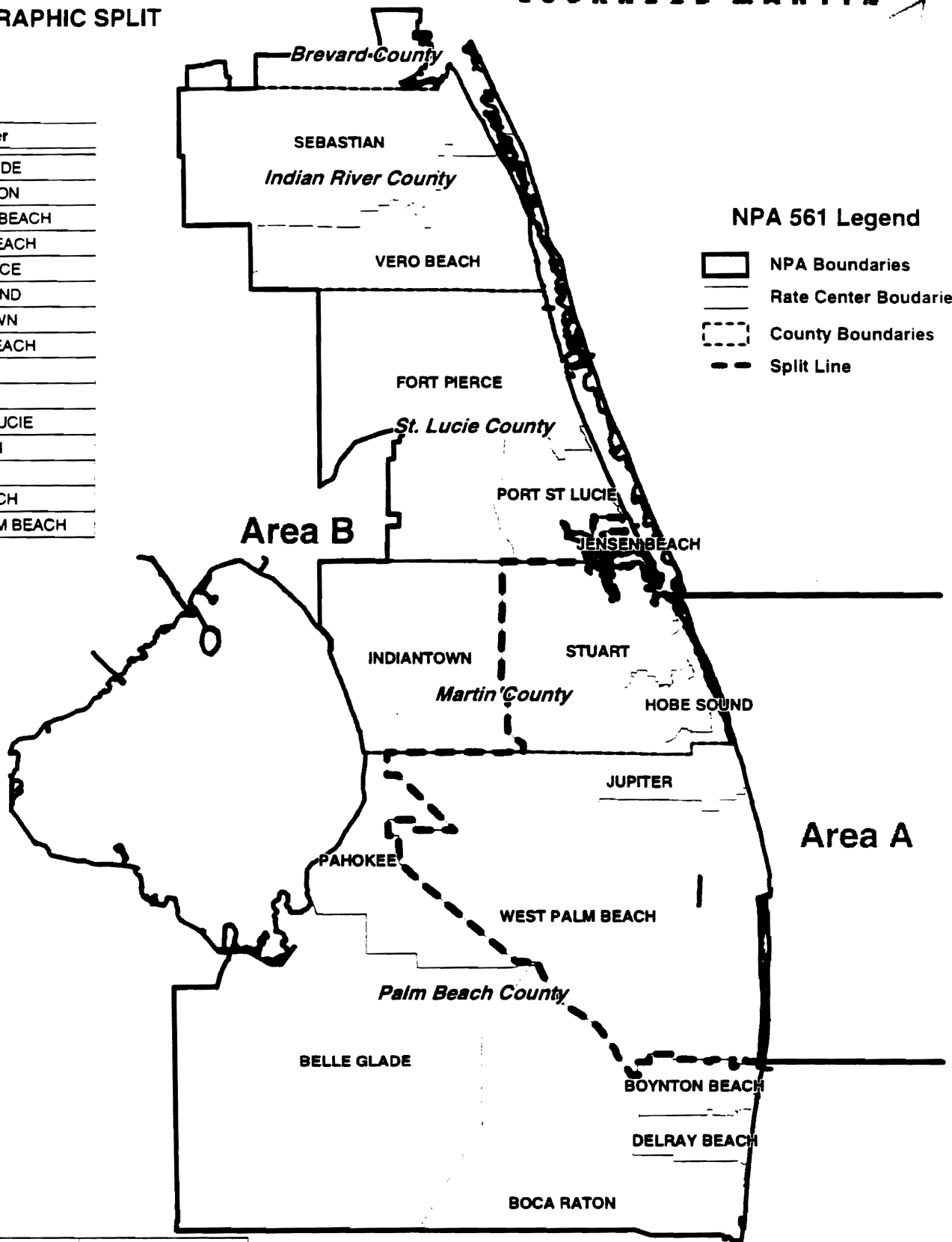
**NPA 561 Rate Center Map
 Alternative # 2
 GEOGRAPHIC SPLIT**



| 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 Boudaries
- 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 |

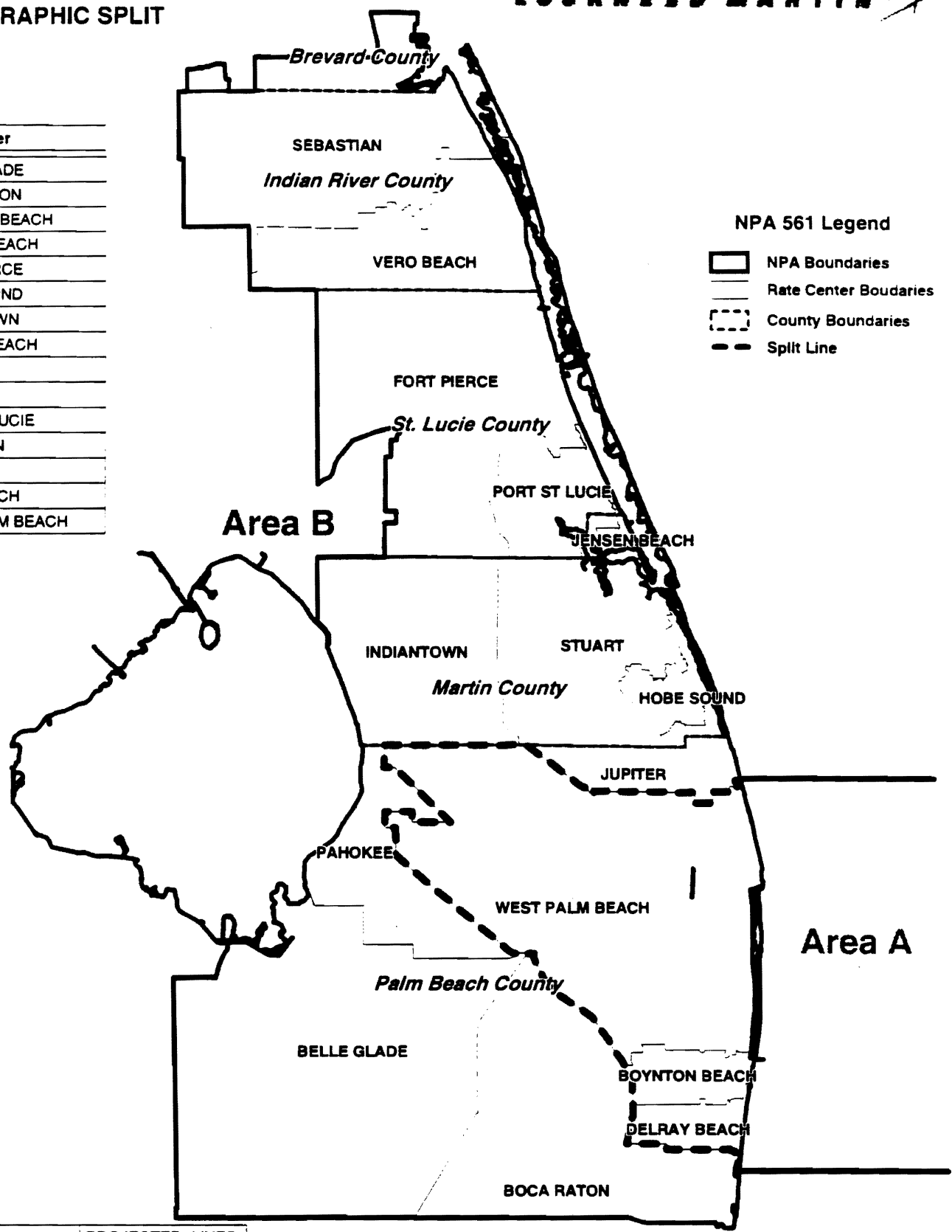
**NPA 361 Rate Center Map
 Alternative # 3
 GEOGRAPHIC SPLIT**

LOCKNEED 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 Boudaries |
|  | 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 |

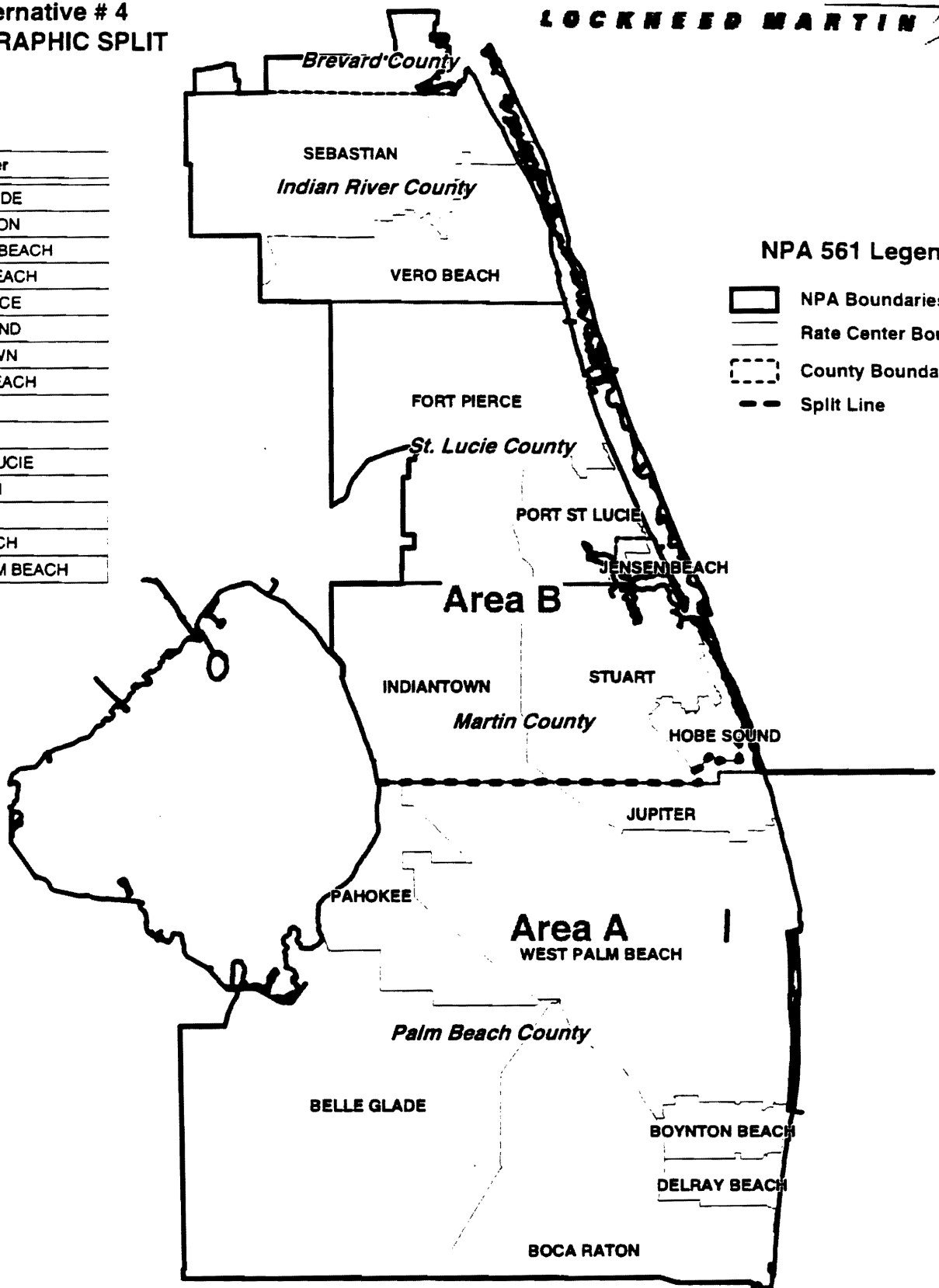
**NPA 561 Rate Center Map
 Alternative # 4
 GEOGRAPHIC SPLIT**

LOCKNEED 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 Boudaries
-  County Boundaries
-  Split Line







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

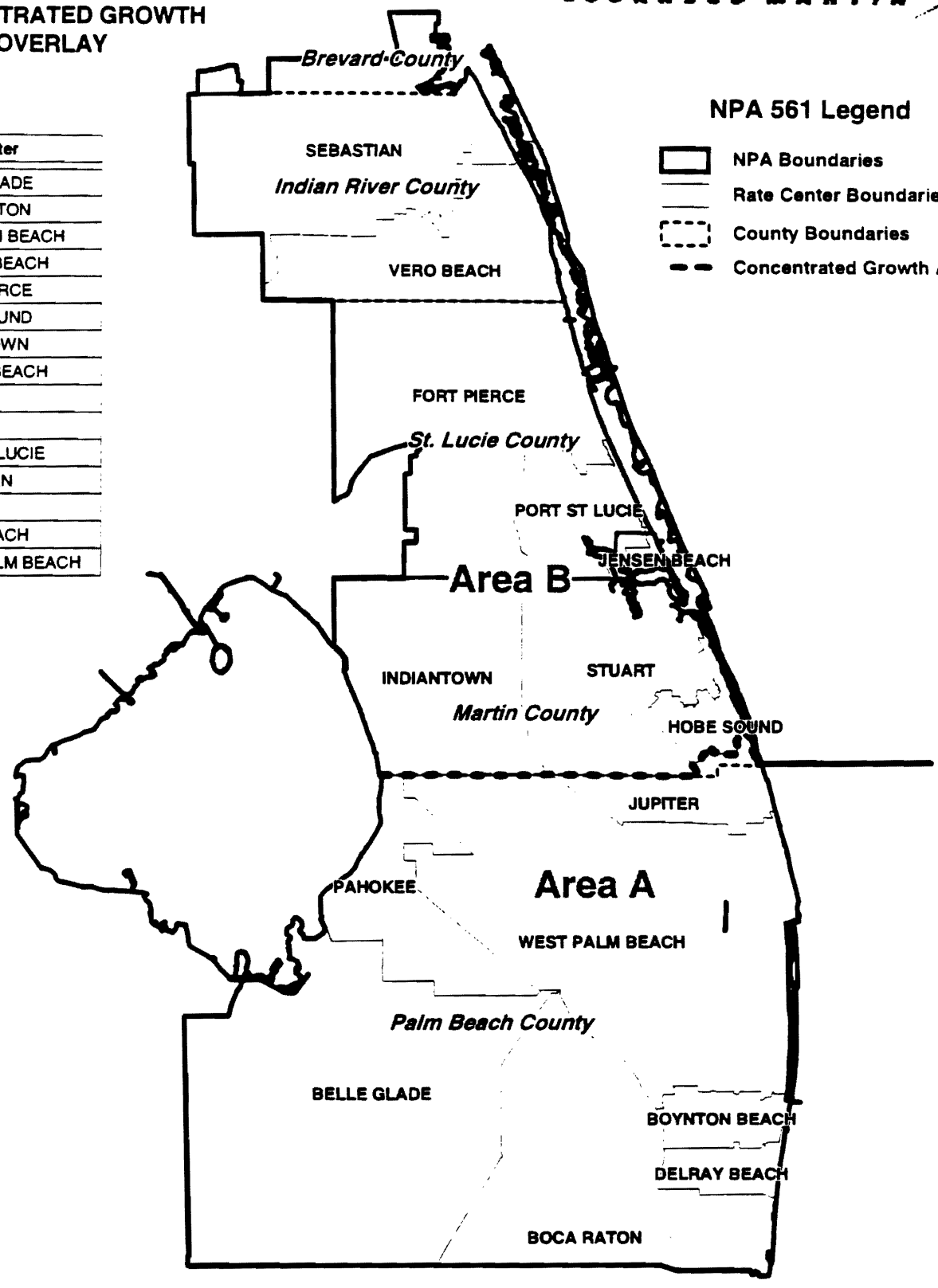
**NPA 561 Rate Center Map
 Alternative # 5
 CONCENTRATED GROWTH
 OVERLAY**

LOCKNEED 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 |

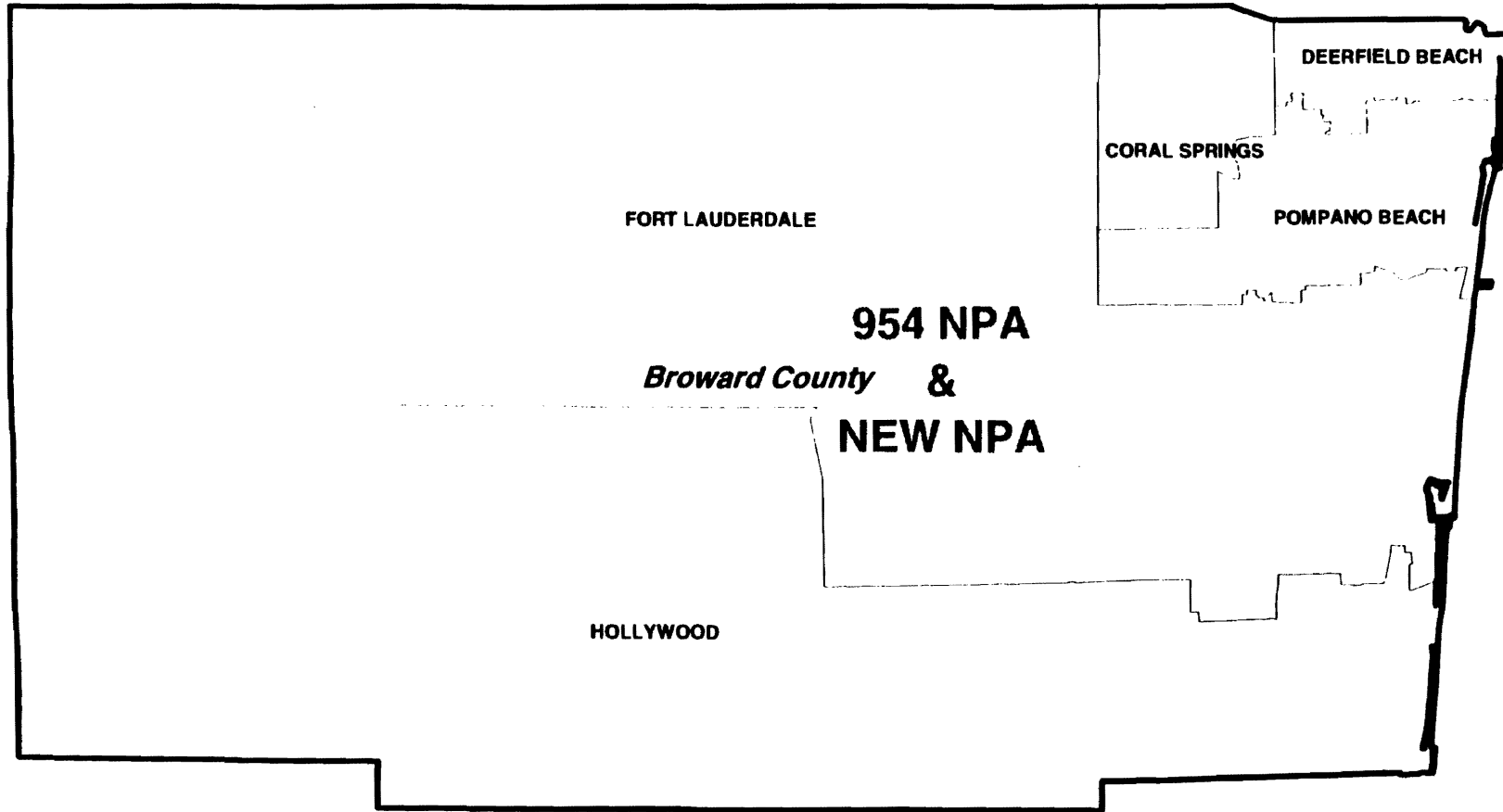
NPA 561 Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  County Boundaries
-  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

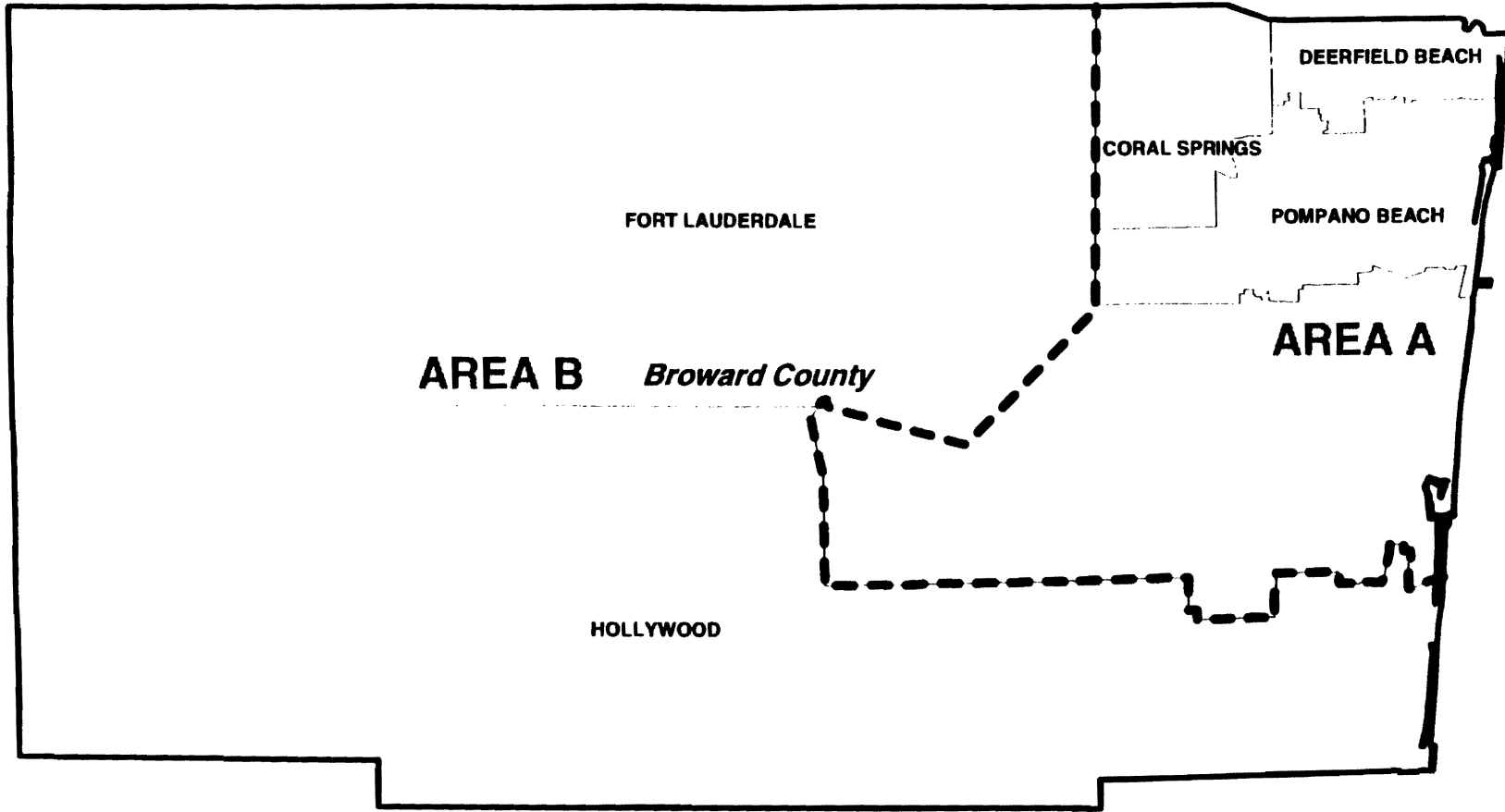
- NPA Boundaries
- Rate Center Boundaries

| 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 |

Produced by CDS Business Mapping 4/19/99

**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 |

Produced by CDS Business Mapping 4/19/99

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 or 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

MORRISON & FOERSTER LLP**STAMP & RETURN**

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

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

August 16, 1999

By Overnight Courier

Ms. Blanca S. Bayo
 Director, Division of Records and Reporting
 Florida Public Service Commission
 2540 Shnard Oak Boulevard
 Tallahassee, Florida 32399-0850

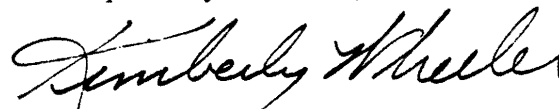
Re: Docket No. 990517-TL

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of the Petition of Lockheed Martin IMS, as the North American Numbering Plan Administrator, on Behalf of the Florida Telecommunications Industry, requesting approval of a relief plan for the 904 area code. 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 Wheeler
 Counsel for Lockheed Martin IMS
 North American Numbering Plan
 Administrator

Enclosures

dc-170957

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT FILED DATE

99753 AUG 17 8

**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 904 Area Code

Docket No. 990517-TL

**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 and on behalf of the Florida telecommunications industry (“Industry”),¹ hereby petitions the Florida Public Service Commission (“Commission”) for approval of a single all services distributed overlay relief plan for the 904 Numbering Plan Area (“NPA”).² Based upon current rationing of central office codes (“CO Codes”) in the 904 NPA, NANPA estimates that without NPA relief, the supply of CO Codes for the 904 NPA will exhaust during fourth quarter

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.

2001. During an Industry meeting held on June 30, 1999,³ the Industry reached consensus to recommend to the Commission an all services distributed overlay for the entire geographic area encompassed by the 904 NPA.⁴ In support of this Petition, NANPA submits the following:

I. BACKGROUND

An unexpected increase in demand for numbers required NANPA to declare Extraordinary Jeopardy⁵ for the 904 NPA on April 21, 1999 to prevent number exhaust and accordingly notified the Commission and the Industry.⁶ On June 3, 1999, the Industry adopted Final Jeopardy Procedures, establishing a rationing quantity of six CO Codes assignments per month, beginning in July 1999. Based on the Final Jeopardy Procedures, the 904 NPA is projected to exhaust fourth quarter 2001.

³ A copy of the meeting minutes, including a list of invitees and attendees, is attached hereto as Exhibit A.

⁴ 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, Jan. 27, 1999) (“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>>.

⁵ Pursuant to the Central Office Code (NXX) Assignment Guidelines, “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.” Central Office Code (NXX) Assignment Guidelines at n. 20 (INC 95-0407-008, Jan. 27, 1999) (“CO Code Guidelines”). Furthermore, “unique circumstances within a given jeopardy NPA may require extraordinary NPA-specific conservation procedures.” *Id.* at §9.5. 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>>.

⁶ Interim jeopardy procedures, which provide for the assignment of only three CO Codes per month, were implemented immediately upon the declaration of Extraordinary Jeopardy. Under the CO Code Guidelines, the interim procedures, including the rationing of three CO Codes per month, continue in effect until the Industry agrees on the terms of the Final Jeopardy Procedures.

Following the establishment of Final Jeopardy Procedures, the Industry met on June 30, 1999 in Jacksonville, Florida to address relief alternatives for the 904 NPA. Pursuant to the NPA Relief Guidelines, NANPA presented an Initial Planning Document (“IPD”) at the meeting. The IPD contained descriptions, maps, dialing requirements and the projected lives of five relief alternatives for the 904 NPA. During the meeting, Industry members proposed a sixth alternative which was later added to the IPD.

At the meeting, the participants discussed the attributes of the various relief alternatives: an all services distributed overlay – referred to as Alternative #1 in the IPD; a concentrated growth overlay – Alternative #2; four versions of a geographic split – Alternatives #3, #4, #5 and #6. The four geographic split alternatives differed as to where the dividing boundary line was placed. The Industry reached consensus to eliminate Alternative #2, the concentrated growth overlay because the projected lives of the new and the existing NPAs would be unbalanced⁷ and special monitoring methods, not currently available, would be required to predict the exhaust of the preexisting area code outside of the concentrated overlay area. The Industry eliminated all of the geographic split alternatives – Alternatives #3, #4, #5 and #6 – because the new NPA boundary would divide local calling areas and cause many customers to change the area code portion of their telephone numbers. Additionally, in each of Alternatives #3, #4 and #6, the projected life of the existing NPA compared to the projected life of the proposed NPA would be unbalanced. The Industry rejected Alternative #6 because it would result in a noncontiguous NPA. The Industry eventually reached consensus during the June 30 meeting to recommend

⁷ See Attachment #4 to Exhibit A at page 5 for a list of the projected lives of the existing and the proposed NPAs for each alternative.

Alternative #1, an all services distributed overlay, to the Commission as the means of relief for the 904 NPA.

II. DESCRIPTION OF THE PROPOSED RELIEF PLAN FOR THE 904 NPA

The all services distributed overlay alternative for the 904 NPA would overlay a new area code over the same geographic area covered by the existing 904 NPA. All existing customers would retain their current area code and telephone numbers. Consistent with current Federal Communications Commission regulations,⁸ the Industry reached consensus to recommend a 10 digit dialing plan both within and across NPA boundaries of the existing NPA and the new NPA.

The Industry reached consensus to recommend the following implementation schedule to the Commission. 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 and will continue for 180 days.⁹ CO Codes will be available in the new NPA 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 an all services distributed overlay as the means of relief for the

⁸ 47 C.F.R. §52.19.

⁹ See Exhibit A for a chart illustrating the NPA relief implementation intervals for the 904 NPA. Implementation of split relief plans requires additional steps and therefore longer implementation intervals.

904 NPA. The Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition.

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

August 16, 1999

**MEETING MINUTES OF THE
904 NPA RELIEF PLANNING INDUSTRY MEETING
JACKSONVILLE, FLORIDA, WEDNESDAY, JUNE 30, 1999**

WELCOME AND INTRODUCTIONS

Pamela Kenworthy, Lockheed Martin NPA Relief Planner, introduced herself and then asked the attendees to introduce themselves and identify the companies they represented. There were 28 participants at the meeting representing 13 different entities. See Attachment #1 for the names of those who were invited to the meeting and those who attended. 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 Lockheed Martin's role and responsibilities as the North American Numbering Plan Administrator ("NANPA") and the transition of the North American Numbering Plan Administration to Lockheed Martin. 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 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 NPA relief attributes. Participants reached consensus to make one modification to the concentrated overlay attributes. Consensus was reached to adopt the attributes as modified. See Attachment #3 for a copy of the modified General NPA Relief Attributes.

CODE ASSIGNMENT HISTORY FOR 904

Industry participants were reminded that 196 codes remain in the 904 NPA. Extraordinary Jeopardy was declared in the 904 NPA in April of 1999. It was also stated that 15 codes had been set aside in the event of an overlay relief decision.

INITIAL PLANNING DOCUMENT FOR 904

Demographic information from the U. S. Census Bureau and detailed information sheets regarding some of the counties in the 904 NPA were distributed to the industry participants. 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 five relief alternatives for the 904 NPA: an all services distributed overlay (Alternative #1), a concentrated growth overlay (Alternative #2) and three geographic splits (Alternatives #3 through #5). The IPD contained maps and the projected lives of each alternative.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 904

During the meeting, industry participants proposes another alternative (Alternative #6) which added rate centers in Clay County (Maxville, Orange Park, Middleburg Kingsley Lake & Green Cove Spring) to Area A of the alternative #3 split boundary line.

A second alternative was discussed, but not proposed for consideration. This alternative suggested Volusia County retain 7-digit dialing.

Consensus was reached by the industry participants to include the following statement into the meeting minutes:

While all of the companies feel that the distributed (all services) overlay is the best long term relief option for the 904 NPA, we realize that individuals and local governments desire to retain their seven-digit local dialing and be excluded from the overlay. We can accept options that may remove a limited number of particular geo-political areas from the overlay. However, it must be recognized that there are additional technical and administrative difficulties which extends the implementation and adds uncertainty to future relief efforts. There may also be specific considerations that may alter the acceptance of any specific plan.

ELIMINATION OF ALTERNATIVES

Industry participants reached consensus to eliminate from consideration the geographic split plans, Alternatives #3, #4, #5 and #6, because all the alternatives divide numerous local calling areas and cause too many customers to undergo telephone number changes. In addition, Alternatives #3 and #4 result in NPAs with unbalanced lives. Alternative #6 produces a noncontiguous NPA as well as NPAs with unbalanced lives.

Industry participants reached consensus to eliminate Alternative #2, the concentrated growth overlay, for several reasons: (1) the portion of the 904 NPA without the overlay has a very short projected life; (2) no administrative tool has been developed to monitor the exhaust of the concentrated overlay; (3) it divides local calling areas; (4) it would create customer confusion when the area outside of the concentrated overlay exhausts and the overlay NPA is extended over the remaining portion of the 904 NPA; and (5) if competitive local exchange carriers request codes in all rate centers, the life of the relief could be suddenly and significantly reduced. Industry participants noted that their past experience with concentrated overlays produced unsatisfactory results.

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 904 NPA.

IMPLEMENTATION INTERVALS FOR 904

The participants reached consensus to recommend the following relief implementation intervals to the Florida Public Service Commission for the 904 NPA:

| | 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 |

Note: Excluding some of the areas from the overlay could affect the implementation intervals.

DIALING PLAN AND INDUSTRY COMMITMENT FOR TEST NUMBER

Consensus was reached to adopt a 10 digit dialing plan within and across NPA boundaries consistent with FCC requirements for the implementation of an overlay.

BellSouth will provide a test number for the NPA.

SUBMISSION TO THE FLORIDA PUBLIC SERVICE COMMISSION

Industry participants reached consensus to have NANPA file the results of the 904 NPA relief meeting with the Florida Public Service Commission. Alternative #1, a distributed overlay, will be submitted for consideration.

CONFERENCE CALL TO APPROVE MINUTES

It was the consensus of the industry participants to convene via conference call to approve the minutes and the draft filing of the 904 NPA relief planning meeting on August 5, 1999 at 10:00 a.m. Eastern. The draft filing and meeting minutes will be distributed by July 28, 1999. Thirty ports have been reserved for the conference call. Dial Information: (612) 335-3420 (access code 5342*); Host: Pamela Kenworthy. The call is expected to last two hours.

**Invitees/Attendees
904 Jacksonville NPA Relief Meeting
June 30, 1999**

| Present | Last Name | First Name | Company | Phone | Fax |
|----------------|------------------|-------------------|----------------------------------|--------------|--------------|
| | Adair | Grady | GTE - Florida | 813-483-2529 | 813-223-4888 |
| | Alberico | David | All Florida Paging | 800-815-0216 | 407-260-5823 |
| | Albertson | Darren | Allegiance Telecom | 214-261-7165 | 214-461-8686 |
| | Alexander | Bridget | ITC DeltaCom | 706-645-9026 | 706-645-9077 |
| | Alexander | Steve | Peoples Telephone Company | 305-593-9667 | 800-864-3355 |
| | Allen | William | Bell Atlantic | | 518-465-0385 |
| | Allington | Gary | BellSouth | 407-237-3319 | 407-237-3054 |
| | Audu | Jonathan | Florida PSC | 850-413-6552 | 850-413-6563 |
| | Bacon | Anita | AT&T Wireless Services | 972-778-5888 | 972-778-5874 |
| | Baker | Barry | AirTouch Paging | 904-396-1510 | 904-396-4708 |
| | Ball | Carlton | GTE Florida | 813-483-2536 | 813-204-8862 |
| | Barrett | Michael | Florida PSC | 850-413-6544 | 850-413-6545 |
| | Beary | James | Porta-Phone Paging | 850-841-7100 | 850-561-8996 |
| | Beck | Charlie | Florida Office of Public Counsel | 850-488-9330 | 850-488-4491 |
| | Bennett | Bruce | Lockheed Martin-NANPA | 925-363-8701 | 925-363-8714 |
| | Bennett | Mary | Radiofone, Inc. | 504-830-5486 | 504-831-7859 |
| X | Benson | Al | BellSouth | 904-350-3359 | 904-355-8210 |
| | Biddix | Timothy | Intermedia Communications | 813-829-4988 | 813-829-6987 |
| | Birtwistle | Rick | AirTouch Paging | 404-876-1624 | 404-257-5066 |
| | Boger | Michael | Daytone Telephone Company | 901-384-9100 | 901-385-7020 |
| | Bolich | Mark | AirTouch Paging | 727-572-7482 | 727-573-0329 |
| | Bonifacic | Jennifer | Alltel Communications | | 773-399-2536 |
| | Borislow | Daniel | Tel-Save, Inc. | 215-862-1500 | 215-862-1085 |
| | Brady | Jim | Bell South Mobility | 407-771-1301 | 407-805-8914 |
| | Brannon | Debby | Teligent | 703-460-2319 | 703-460-2274 |
| | Brantley | Mike | Arch Communications | 770-492-3903 | 770-492-3919 |
| | Brege | Jim | BellSouth Mobility, Inc. | 407-247-0002 | 407-805-8914 |
| | Brieaddy | Tom | TSR Paging | 619-268-5050 | 619-268-8063 |
| | Brooks | Suzanne | MCI World Com | 972-656-1430 | 972-656-1499 |
| | Brown | Steven | Intermedia Communications, Inc. | 812-829-2231 | 813-829-4923 |
| | Brown | Joy | Quincy Telephone | 850-875-5214 | 850-875-5226 |
| | Brown | Scott | MCI Metro | 404-267-5936 | 404-825-5992 |
| | Brown | Bill | BellSouth Cellular Corp. | 404-249-0486 | 404-249-0453 |
| | Browne | Lydelle | Intercontinental Comm. Group | 561-274-8044 | 561-274-3964 |
| | Brownworth | Steven | Interstate FiberNet | 706-645-8555 | 706-645-8989 |
| | Bumgarner | Jack | Central Wireless Partnership | 559-440-0164 | 559-440-0297 |
| | Burleson | Ron | BellSouth Cellular | 404-249-0455 | 404-249-0455 |
| | Butler | Virginia | BellSouth | 904-350-3400 | 904-350-4150 |
| | Cabrera | Bill | AGR Electronics/Metro Call | 305-556-8438 | 305-827-1005 |
| | Cairon | Frank | PrimeCo PCS | 904-348-3640 | 904-348-3618 |
| | Campbell | David | Vista-United Telecommunications | 407-827-2112 | 407-827-2128 |
| | Castle | Gregory | Pacific Bell | 415-542-7083 | 415-543-2935 |
| | Chavez | John | General Paging | 305-267-5554 | 305-267-5554 |
| | Childers | Judy | BellSouth - Reg. & Ext. Affairs | 305-347-5414 | 305-577-3027 |
| | Cigler | Jim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Clark | Tony | Seiko Communications Systems | 503-531-1624 | 503-531-0519 |
| | Clark | Melanie | Sprint PCS | | |
| | Climer | Tom | Intermedia Communications | 800-940-0011 | 813-829-2281 |

| | | | | | |
|---|--------------|------------|-----------------------------------|--------------|--------------|
| | Cocotta | Sue | Frontier Local Services | 716-777-1692 | 716-325-4481 |
| | Colaco | Frank | Lockheed Martin-NANPA | 973-740-9100 | 973-740-9119 |
| | Collins | Shannon | Lockheed Martin | 925-363-8707 | 925-363-8729 |
| | Cooperman | Kenneth | BellSouth | 305-622-3250 | 305-622-3292 |
| | Cotter | Mary | Time Warner-Syracuse | 315-463-2288 | 315-463-2088 |
| | Cox | Will | Florida Public Service Commission | 850-413-6204 | 850-413-6205 |
| | Craterm | Richard | Teleco Engineer Manager | 904-348-3624 | 904-348-3818 |
| X | Cutting | John | Florida PSC | 850-413-6844 | 850-413-6845 |
| | Dantley | James | IDS Telecom///Quincy | 850-875-5205 | 850-875-5226 |
| | Darnutzer | Ron | Meretel Communications | 318-421-6215 | 318-421-6233 |
| | Davi | Anthony | Lockheed Martin -NANPA | 925-363-8705 | 925-363-8714 |
| | Davidson | Darcy | SEIKO Communications Systems | 503-531-1624 | 503-531-0519 |
| | Day | Steven | Metrocall | 703-660-6677 | 703-765-4385 |
| | Deese | Elaine | Alltel Communications, Inc. | 704-845-7290 | 704-845-7229 |
| | Deweese | Robert | Peabody & Brown | 617-345-1316 | 617-345-1300 |
| | Dixon | MaryAnn | Sprint | 407-889-6171 | 407-884-1978 |
| | Dolensky | Ed | BellSouth Industry Relations | 205-321-2010 | 205-321-4754 |
| | Duff | Jason | Sprint | 407-889-6807 | 407-884-0206 |
| | Duplechin | Derrel | Columbia Telecom, Inc. | 504-927-6815 | 504-927-6818 |
| | Edwards | Toni | Vista Untied | 407-827-2004 | 407-827-2220 |
| | Eicholz | Kathy | Sprint Communications | 913-534-2605 | 913-534-5366 |
| | Eldredge | Paul | Comay Telco Inc. | 508-390-9000 | 516-794-1742 |
| | Elter | Jim | PageNet | 908-541-6151 | 908-541-6150 |
| X | Eudy | Harriet | Alltel | 904-364-2517 | 904-364-2474 |
| | Faul | Kelly | MCI World Com. | 703-918-0457 | 703-918-6814 |
| | Fields | Helen | CONXUS Network, Inc. | 864-241-5412 | 864-241-8197 |
| | Figlioli | Vito | Sprint PCS | 813-639-2023 | 813-639-2050 |
| X | Flaherty | Reva | Bell South | 305-347-5405 | 305-577-3027 |
| | Flores | Adrienne | AT&T Wireless | 201-291-8067 | 201-291-8044 |
| X | Foley | Thomas | Sprint | 407-889-6168 | 407-884-1919 |
| | Fondren | John H. | Hart Communications | 912-242-3237 | 912-242-5363 |
| | Fordham | Lee | Florida Public Service Commission | 850-413-6226 | 850-413-6227 |
| | Foss | L.Theodore | Newport Telephone Co. Inc | 315-845-8112 | 315-845-8662 |
| | Frazee | George | BellSouth - Reg. & Ext. Affairs | 850-224-5139 | 850-222-8640 |
| | Frederickson | Jim | Bravo Cellular, L.L.C. | | |
| | Fredlund | Andy | Arch Communications | 561-912-7410 | 561-912-7450 |
| | Fry | Terry | City of Lakeland | 941-499-8760 | 941-499-8761 |
| | Gadbois | Steve | Arch Communications | 704-341-5131 | 704-544-0103 |
| | Gaffney | John | Nextel | 914-448-4309 | 914-421-2700 |
| | Gagneaux | Lew | BellSouth Public Comm. Inc | 205-943-2620 | 205-943-2508 |
| | Gallagher | Josephine | Bell Atlantic | 703-974-8160 | 703-974-0616 |
| | Gerstemeier | Richard | Time Warner AXS of Florida | 407-215-6800 | 407-215-6803 |
| | Gifford | Jennifer | Nextel | 617-839-5622 | 617-839-5912 |
| X | Glover | Joanne | BellSouth | 904-350-3743 | 904-350-4150 |
| | Goette | Fred | G.B.F.A.N | 912-746-1372 | 912-746-1373 |
| | Gonos | Daniel | Winstar | 248-539-7877 | 248-539-7879 |
| | Gonzalez | Daniel | NEXTLINK Communication, Inc | 202-721-0999 | 202-721-0995 |
| | Gonzalez | Izzy | MediaOne | 904-619-3323 | 904-619-3355 |
| | Gonzalez | Julian | Beep-Net | 305-388-3100 | 305-388-9130 |
| | Goodell | Paul | Priority Communications | 561-750-8899 | 561-391-4705 |
| | Gooden | Debra | MCI | 972-656-5575 | 972-656-1499 |
| | Goodgine | Janice | Bell South | 205-977-0741 | 205-977-7877 |
| | Goodroe | Lynn | MCI World Com | 601-460-8852 | 601-460-8864 |

| | | | | | |
|---|-------------|-----------|--------------------------------------|--------------|--------------|
| | Graham | Mildred | Sprint | 407-889-6102 | 407-884-0206 |
| | Grant | Dennis | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| | Gray | Eddie | GTE Wireless | 678-339-4412 | 678-339-8572 |
| | Gray | Bob | BellSouth Long Distance, Inc. | 770-352-3021 | 770-352-3184 |
| X | Green | Barbara | Sprint | 407-889-1330 | 407-884-1978 |
| | Greene | Linda | Bell Atlantic | 410-736-6828 | 410-736-6066 |
| X | Greer | Stan | BellSouth Telecommunication | 850-224-5139 | 850-224-5073 |
| | Griffith | Georgia | Media One d/b/a Amer Ca Sys | 914-762-8684 | 914-762-0799 |
| | Guariglia | Annette | MCI | 914-312-2287 | 914-312-2287 |
| | Guepe | Richard | AT & T | 404-810-7389 | 404-810-5901 |
| | Guerrero | Rick | Cox California Telcom | 949-716-2024 | 949-716-2007 |
| | Hager | Doug | Alltel Communications, Inc. | 704-845-7275 | 704-845-7382 |
| | Haines | Carmen | Excel Communications | 972-588-4714 | 972-588-4951 |
| | Hancock | Hershel | GTE Mobilnet of Tampa, Inc. | 813-282-6417 | 813-620-4124 |
| | Harshbarger | A. L. | GTE | 813-483-2541 | 813-204-8862 |
| | Hartman | Ken | Bell South Telecom, Inc. | 404-927-8670 | 404-524-2918 |
| | Hartsfield | Don | Arrow Communications/ITS | 561-597-2827 | 561-597-2110 |
| | Hatch | Alice | Omnipoint | 954-457-5744 | 954-457-5705 |
| | Hatfield | Steven | AT & T Wireless Services | 941-551-4055 | 941-551-4033 |
| | Hatton | Ron | GTE Florida | 813-483-3912 | 813-204-8857 |
| | Hayes | Sheila | Sprint | 913-534-2623 | 913-534-5366 |
| | Heaton | Francis | Wireless One Network L.P. | 941-489-1600 | 941-489-1622 |
| X | Henderson | Anne | AT&T | 404-810-8913 | 404-810-6422 |
| | Higgins | Jeannine | Bell Atlantic | | 716-842-7090 |
| X | Hiltz | Cara | Adelphia Business Solutions | 412-220-5083 | 412-220-5164 |
| | Hobson | Elizabeth | BellSouth Mobility, Inc. | 407-771-1321 | 407-805-8914 |
| | Hogan | Jeff | Teleport Communications | 718-355-2797 | 718-355-4804 |
| | Hogue | John | Sprint | 913-624-6016 | 913-624-5504 |
| | Holmes | Dennis | OpTel, Inc. | 214-634-3842 | 214-634-3837 |
| | Holt | Lew | Aerial Communications | 813-243-3224 | 813-243-1906 |
| | Hopfer | Bill | Continental FL Telecom | 904- | 904-731-8699 |
| | Horton | Chris | AirTouch Cellular | 404-257-5314 | 404-257-5066 |
| | Hoskins | Ann | Bell Atlantic - Legal Dept. | 212-395-6511 | 212-768-7568 |
| X | Hunter | Dena | Media One | 303-705-5145 | 303-790-1094 |
| | Huntley | David | Cellular One | 617-462-5094 | 617-462-5024 |
| | Hutchenson | Kim | AT&T | 732-234-4787 | 732-719-7246 |
| | Huttenhower | Bill | Vista United | 407-827-2182 | 407-827-2424 |
| | Hymans | Linda | Lockheed Martin-NANPA | 512-331-0751 | |
| X | Ileri | Levent | Florida Public Service Commision | 850-413-6562 | 850-413-6563 |
| | Imbag | Jennifer | TSR Wireless LLC | 818-346-0611 | 818-346-1543 |
| | Irwin | Chris | Aerial Communications | 773-399-6843 | 773-864-9235 |
| | Israel | Susan | BellSouth Cellular | 404-249-0478 | 404-249-0453 |
| X | Jackson | Lester | Allsafe Paging | 904-268-7233 | 904-268-4504 |
| | James | Michelle | MCI WorldCom | 616-224-4603 | 616-224-5110 |
| X | Jardon | Mario | BellSouth Mobility | 561-995-3583 | 561-988-2729 |
| | Jobe | Jack | Dynatel Paging | 904-730-6000 | 904-730-2012 |
| | Johnson | Jeannie | Sprint | 407-830-3044 | 407-884-1978 |
| | Jordan | Paula | AirTouch Cellular | 925-279-6033 | 925-279-6621 |
| | Kelly | Lonnie | Foothills Rural Telephone Corp. Inc. | 606-297-3501 | 606-297-2000 |
| | Kennicott | Deborah | AT&T - Wireless | 773-695-2171 | 773-695-2190 |
| X | Kenworthy | Pamela | Lockheed Martin- NANPA | 973-267-7812 | 973-267-7921 |
| | Khazraee | Sandy | Sprint | 850-847-0173 | 850-878-0777 |
| | Kim | Donna | Accutel Comm., Inc. | | |

| | | | | | |
|---|-------------|------------|--------------------------------------|--------------|--------------|
| | Kimmell | Beth | Sprint | 816-559-5023 | 816-559-5093 |
| | Kinlen | Charlene | BellSouth | 561-468-5540 | 561-464-4137 |
| | Klugerman | Paul | ABC Paging | 305-621-6000 | 305-521-4475 |
| | Krug | John | AT&T | 718-355-2762 | 718-355-4804 |
| | Kwon | Rhea | Allegiance Telecom | 312-228-6192 | 312-228-6180 |
| | LaCava | Julie | Bell Atlantic | 518-396-1046 | 518-465-8488 |
| | Langford | Thomas | Mercury Paging & Comm. | 914-471-0833 | 516-677-9510 |
| | Lanning | Keri | Intermedia Communications | 813-829-6605 | 813-829-2281 |
| | LaPlante | Doug | PageNet Florida Systems | 954-922-9644 | 954-922-9118 |
| X | Lee | David | Allsafe Paging | 904-268-1111 | 904-268-4504 |
| | Lee | Steven | Airsignal of California, Inc. | 310-641-2366 | 310-641-2342 |
| | Lewis | Charles W. | Nextlink | 305-626-2808 | 305-626-9602 |
| X | Lewis | Charles M. | BellSouth | 404-927-2047 | 404-873-0432 |
| | Lezcano | Ed | Rainbow Paging | 305-593-7711 | 305-593-8844 |
| | Lipsky | Ted | Rainbow Paging | 305-594-7711 | 305-593-8844 |
| | Locke | Jerry | Orlando Tel. Co. | 407-996-8900 | 407-996-8901 |
| | Logering | Dennis | American Paging | 813-288-9497 | 813-289-3966 |
| | Ludwikowski | Scott | Sprint Spectrum PCS | 913-315-2611 | 913-315-2532 |
| | Lukowski | Raymond | WinStar Telecommunications, Inc. | 703-645-5466 | 703-645-5704 |
| | Lunceford | Gene | BellSouth | 205-321-2013 | 205-321-4754 |
| | Luttrell | Steve | Vista United | 407-827-2232 | 407-827-2600 |
| | Mallicote | Brenda | GTE Wireless | 813-282-6144 | 813-282-6040 |
| | Mangelo | Richard | ATT Local | 732-771-2690 | 908-771-8268 |
| | Marchant | Dick | Intermedia Communications of Florida | 813-829-4020 | 813-829-5722 |
| | Marshall | Fred | DataCom | 318-234-3438 | 318-269-1284 |
| | Martin | Charles | BellSouth Long Distance Inc. | 770-352-3249 | 770-352-3184 |
| X | Martin | Michael | Aerial Communications | 813-243-3217 | 813-243-1906 |
| | McCallen | Ray | BellSouth Telecommunications | 205-321-8906 | 205-321-4754 |
| | McCarthy | Angela | MapMobile Communications | 757-424-1191 | 757-578-4963 |
| | McCartney | Joe | AGR/Pronet Paging Inc. | 727-572-6646 | 727-573-7844 |
| | McClellan | Garry | West KY Rural Telephone | 502-674-1000 | 502-856-3313 |
| X | McCullough | Douglas A. | BellSouth Telecommunications | 205-977-5069 | 205-977-7877 |
| | Meins | Charlene | AT&T Wireless | 425-580-8132 | 425-806-3662 |
| | Meldazis | Daniel | Focal Communications Corp. | 312-895-8272 | 312-895-8403 |
| | Merrill | J.B. | BTI | 919-510-7270 | 919-510-7239 |
| | Merriman | Rebecca | BellSouth | | |
| | Merritt | Garey | PageNet of America | 407-649-8007 | 407-872-3808 |
| | Messer | Steve | Alltel | 850-845-4050 | 850-847-4671 |
| X | Milby | Wayne | Lockheed Martin-NANPA | 804-795-5919 | 804-795-5514 |
| X | Milchuck | Kim | Adelphia Business Solutions | 814-260-6901 | 814-260-6867 |
| | Mitchell | Tim | AirTouch Paging | 561-994-3800 | 561-994-5975 |
| | Monagle | Dan | Bell Atlantic | 215-963-6004 | 215-563-2658 |
| | Mosca | Paul | Cellular One | 617-462-7048 | 617-462-5975 |
| | Mostrom | Eric | Norcom, Inc. | 561-392-2550 | 561-392-0716 |
| | Murray | Melissa | KMC Telecom | 770-638-2485 | 770-806-4988 |
| | Murray, III | John J. | Payphone Consultants, Inc. | 954-484-2500 | 954-714-0005 |
| | Nanos | Janet | Omnipoint Communications | 973-290-2513 | 973-290-2445 |
| | Newkirk | Terry | Time Warner | 303-566-5954 | 888-329-0668 |
| X | Nobles | Deborah | Northeast Florida Telephone Company | 904-259-0639 | 904-259-7722 |
| | Nugue | Carlos | PrimeCo Personal Communications | 561-995-5723 | 561-995-5514 |
| X | Packer | Howard | BellSouth Mobility | 954-850-6400 | 954-850-6400 |
| | Parker | Dennis | UNICOM Communications, LLC | | |
| | Paswaters | Shirley | Level 3 Communications | 303-635-9602 | 303-635-9530 |

| | | | | | |
|---|---------------|------------|--|--------------|--------------|
| | Pendleton | Charles | CAP Management, Inc | 606-432-0720 | 606-433-0500 |
| | Phillips | Bubba | AT&T Long Distance | 770-785-5773 | 770-929-4348 |
| | Potter | Paul | Time Warner Telecom | 407-215-6850 | 407-215-6801 |
| | Prefer | John | Priority Communications | 561-750-8899 | 561-391-4705 |
| | Pressler | Dave | Communications, Inc. | 800-476-3427 | 334-626-3171 |
| | Queenin | Larry | BellSouth | 954-742-1389 | 954-746-0862 |
| | Randall | Jacqueline | Level 3 Communications | 303-635-9603 | 303-635-9530 |
| | Rehwinkel | Charles | Sprint Florida | 850-847-0244 | 850-878-0777 |
| | Reichenberger | Tom | Aerial Communications | 813-243-3205 | 813-243-1906 |
| | Reid | Sean | Metrocall | 850-438-1653 | 850-432-9208 |
| | Renna | Diane | AT&T Local | 908-234-7347 | 908-234-7246 |
| | Reuter | Larry | US Cellular | 352-665-4332 | 652-665-4492 |
| | Rios | Mireya | PageMart | 214-765-3853 | 214-765-4981 |
| | Ripper | Elder | Telephone Company of Central Florida, Inc. | | |
| | Roberts | Sherita | LDDS WorldCom | 918-590-8529 | 918-590-5598 |
| | Rosario | Reggie | Paging Network of Tampa | 813-873-8400 | 813-876-3710 |
| | Ross | Cathy | Citizens Communications | 214-365-3340 | 214-365-4059 |
| | Rowland | Tom | North Central Tel. Coop. | 615-666-2151 | 615-666-6772 |
| | Rush | Lee | Alltel | | |
| | Rutherford | Pam | Alltel Florida | 704-845-7196 | 704-841-3231 |
| | Ryan | William | Cable Vision of New York City | 718-991-6000 | 718-378-2625 |
| | Sadler | Harry | GTE Florida | 813-483-2005 | 813-228-8733 |
| | Salpietra | Carl | Nextel | 407-948-2142 | 407-667-1240 |
| | Sanders | John | Preferred Networks, Inc. | 770-582-3723 | 770-734-0936 |
| X | Sawyer | Bill | BellSouth | 904-350-4541 | 904-355-8210 |
| | Schiltz | Jeanne | TPS Telecom | 608-664-4236 | 608-664-4225 |
| | Schreier | Fran | Sprint PCS | 816-559-5290 | 816-559-5093 |
| | Schwartz | Mike | General Comm.&Elec. Corp | 516-501-0466 | 516-501-0464 |
| | Scobie | Michael | GTE | 813-483-2530 | 813-223-4888 |
| | Serenci | John | Bell South | 954-928-4710 | 354-772-5105 |
| | Shapiro | Phil | AT& Comm. Of NY Inc. | 518-463-2555 | 518-463-5943 |
| | Sheets | Scott | Airtouch Paging | 972-860-3353 | 972-860-3248 |
| | Shoenfelt | Terry | Strategic Technologies, Inc. | 305-229-6591 | 305-229-6580 |
| | Sidelia | Brian | Adelphia Business Solutions | | |
| | Simons | Miles G. | Bell South Mobility | 954-695-4864 | 954-695-4864 |
| | Sinha | Vijay | Aerial Communications | 773-399-7508 | 773-864-9337 |
| | Slavik | Ron | AT & T Wireless | 407-667-5682 | 407-875-0422 |
| X | Smith | Dana | PrimeCo Personal Communication | 817-258-1036 | 817-258-1805 |
| | Snider | Vicki | BST Infrastructure Planning | 954-928-4740 | 954-772-5105 |
| | Snyder | Bob | Pagemart, Inc. | 214-765-4209 | 214-765-4981 |
| | Stedie | Mazen | Pager One of Florida, Inc. | 561-687-8400 | 561-687-1235 |
| X | Stephenson | Suzanne | BellSouth Mobility, Inc. | 407-771-1311 | 407-805-8914 |
| | Stevens | Aloha | Citizens Communication | 801-553-0274 | 801-553-0905 |
| | Struthers | Brent | Lockheed Martin-NANPA | 847-836-0785 | 312-814-1818 |
| | Sullivan | John G. | Eastern Telelogic Corp. | 610-992-8556 | 610-337-1444 |
| | Tapia | Larry | GTE Florida | 813-483-2188 | 813-221-8103 |
| | Tatem | Tim | BellSouth Mobility, Inc. | 407-719-0010 | 407-805-8914 |
| | Taulbee | Kathy | Sprint | 407-889-1592 | 407-884-0206 |
| | Taylor | Greg | Digiph | 770-446-5020 | 770-446-5035 |
| | Telecom | Manager | Group Long Distance Inc. | | |
| | Telecom | Manager | Intetech, L.C. | | |
| | Thakur | Tony | Time Warner Telecom | 407-215-6800 | 407-215-6803 |
| | Thomas | Steve | GTE Florida | | |

| | | | | | |
|---|-----------|------------|----------------------------------|--------------|--------------|
| | Thomas | Bill | GT Com | 850-229-7222 | 850-227-7366 |
| | Thomas | Denise | MCI WorldCom | 925-824-2007 | 925-244-1300 |
| | Thompson | Doug | Amenpage, Inc. | 305-231-8008 | 305-827-4906 |
| | Thompson | Leon | Nextel Communications | 770-326-7965 | 770-326-7966 |
| | Tinsley | Charles | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | Tirador | Judy | Omnipoint Communications | 973-290-2411 | 973-290-2445 |
| | Tolliver | Ron | Intermedia Communications, Inc. | 813-744-2438 | |
| | Tomblin | Jeff | Paging Network, Inc. | 972-985-5162 | 972-985-6519 |
| | Toolsie | Ramesh | Primeco | | |
| | Twombly | Dana | Utilities, Inc. | 207-642-7208 | 207-642-3095 |
| | Ude | Harriott | Alltel | | |
| | Upton | Jodi | City of Lakeland | 941-834-6804 | 941-834-8761 |
| | Valdez | Ed | Teligent | | |
| | Van Allen | Eric | Palmer Cellular | | |
| | Van Brown | Barbara | MGC Communications, Inc. | 702-310-4242 | 702-310-5712 |
| | Van Dyke | Robert | Intermedia Communications | | |
| X | Van Leer | Dave | Bell South | 904-350-2167 | 904-358-1060 |
| | Vaughn | John H. | St. Joseph Tel. Co. | 850-229-7221 | 850-229-8689 |
| | Wall | Billy | AirTouch Paging | 407-741-5581 | 407-740-7624 |
| | Walsh | Tucker | MCTA | | 601-352-2280 |
| | Waters | Ron | GTE Florida | | |
| | Watkins | Daryl | GTE Wireless | 813-282-6431 | 813-620-4124 |
| | Watson | Dana | PrimeCo Personal Communications | 817-258-1270 | 817-258-1243 |
| | Watson | James C. | Z- Tel, Inc. | 941-540-8440 | 941-542-4408 |
| | Watson | Dana | PrimeCo Personal Communications | 817-258-1270 | 817-258-1243 |
| | Wax | Dennis | Bell Atlantic | 518-396-1020 | 518-465-8488 |
| | Weeks | Rick | BellSouth | 954-928-4737 | 954-492-1752 |
| | Welbaum | Deana | City of Lakeland | 941-499-6803 | 941-499-8821 |
| | Whelton | Thomas | Cellular One | 617-462-5081 | 617-462-5038 |
| | Whipple | Larry | BellSouth | 305-622-3263 | 305-622-3292 |
| | Wickham | Jennifer | Goetek Communications, Inc. | 201-930-5187 | 201-930-0287 |
| | Wieners | Paul | CTC Communications | 781-466-1231 | 781-466-1263 |
| | Wiggins | Patrick K. | Telephone Co. of Central Florida | | |
| | Wiginton | Bill | Pagenet | 972-801-8051 | 972-801-8966 |
| | Willer | Jackie | Vescio - MGC | | |
| | Williams | Terry | Nextel Communications | 407-948-2145 | 407-667-1240 |
| | Williams | Lloyd | Super Telecom | 305-476-4240 | 305-443-1078 |
| | Williams | Frederick | MCI WorldCom | 972-656-1816 | 972-656-1499 |
| | Willis | Eleanor | Winstar Telecommunications Inc | 202-530-7656 | 202-530-0977 |
| X | Willis | Betty | Alltel | | |
| | Wooten | Kristy | Mobil Comm | 601-977-1575 | 601-977-1748 |

FLORIDA 904 NPA RELIEF INDUSTRY MEETING

WEDNESDAY JUNE 30, 1999

**RADISSON RIVERWALK HOTEL
1515 PRUDENTIAL DRIVE
JACKSONVILLE, FLORIDA 32207
(904) 396-5100**

AGENDA

- 9:00 Welcome and Introductions
- 9:10 NANPA's Role and Responsibilities
- 9:20 Minutes and "Statements For The Record"
- 9:25 Industry Guidelines / Relief Attributes
- 10:00 Review Code Assignment History
- 10:15 Break
- 10:30 Review Initial Planning Document
- 11:30 Additional Alternatives from Industry
- 12:00 Lunch (On Your Own)
- 1:00 Elimination Of Alternatives
- 2:00 Consensus On Relief Alternative
- 2:15 Consensus on Dialing Plan
- 2:45 Consensus on Implementation Intervals
- 3:15 Industry Commitment For Test Number
- 3:30 Consensus on NANPA Filing Industry Efforts With Commission
- 3:40 Statements For the Record
- 3:45 Set Date For Conference Call To Approve Minutes
- 3:55 Complete NANPA Survey
- 4:00 Adjourn

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 in comparison to a distributed overlay.
 - Normally, no existing customers will be required to change their telephone number.
-
-

Initial Planning Document
For Relief of Florida: 904 NPA
1999 COCUS Projected Exhaust Date 4Q01

North American Numbering Plan Administration

904 NPA Relief Alternatives
1999 COCUS Projected Exhaust Date 4Q01

| |
|-----------------------------|
| Overlay Alternatives |
|-----------------------------|

Alternative # 1

Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 904 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 904 NPA all code assignments will be made in the overlay area code.

Total codes at Exhaust = 752

Area code life in years = * 10.1 to 20.3

Alternative # 2

Concentrated Growth Overlay

A new NPA code would be assigned to the rate centers in Nassau, Duval and St. Johns Counties (Area A) with an effective date of 3Q2000. Any unassigned 904 NXX codes would only be used to extend the life of the remainder of the 904 NPA (Area B) and growth NXX codes for the three counties mentioned above would be assigned from the overlay NPA. Customers in the Concentrated Overlay Area (Area A) would retain their current telephone numbers; however ten digit local dialing by all customers between and within area codes would be required. Customers outside of the Concentrated Overlay area (Area B) would continue with seven digit local dialing until exhaust of the remaining NXX codes in the 904 NPA. At that time, the Concentrated Growth Overlay would expand to cover the entire existing 904 geographic area and ten digit local dialing would also be required in Area B.

Area A

Total codes at Concentrated Relief = 396

Area code life in years = * 11.4 to 21.5

Area B

Total codes at Concentrated Relief = 242

Area code life in years = * 4.1 to 5.4

Note: For Alternative # 2 the ultimate life of Area A and Area B will be equal to the life of Alternative # 1 as the Overlay expands over Area B. Projections are based on 1.25 year growth.

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 # 3

Nassau, Duval and St. Johns

Split boundary line runs along rate center boundaries in Nassau, Duval and St. Johns counties which is depicted as Area A in the attached map for Alternative # 3.

Area A

Total codes at Exhaust = 457

Area code life in years = * 7.0 to 14.0

Area B

Total codes at Exhaust = 295

Area code life in years = * 14.3 to 28.6

Alternative # 4

North and Northwest Counties

Split boundary line includes Nassau, Duval, Baker, Bradford, Union, Alachua, Columbia, Gilchrist, Lafayette, Suwannee and Hamilton counties in one geographic area. These eleven boundaries make up Area A on the attached map for Alternative # 4.

Area A

Total codes at Exhaust = 472

Area code life in years = * 6.0 to 11.9

Area B

Total codes at Exhaust = 280

Area code life in years = * 17.3 to 34.6

Alternative # 5

Nassau and Duval Counties

Split boundary line includes Nassau and Duval counties in one geographic area comprising Area A on the attached map.

Area A

Total codes at Exhaust = 398

Area code life in years = * 9.5 to 19.1

Area B

Total codes at Exhaust = 354

Area code life in years = * 10.7 to 21.5

Alternative # 6

Nassau, Duval, Clay and St. Johns

Split boundary line runs along rate center boundaries in Nassau, Duval, Clay and St. Johns counties which is depicted as Area A in the attached map for Alternative # 6.

Area A

Total codes at Exhaust = 487

Area code life in years = * 5.8 to 11.7

Area B

Total codes at Exhaust = 265

Area code life in years = * 17.0 to 33.9

* 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.

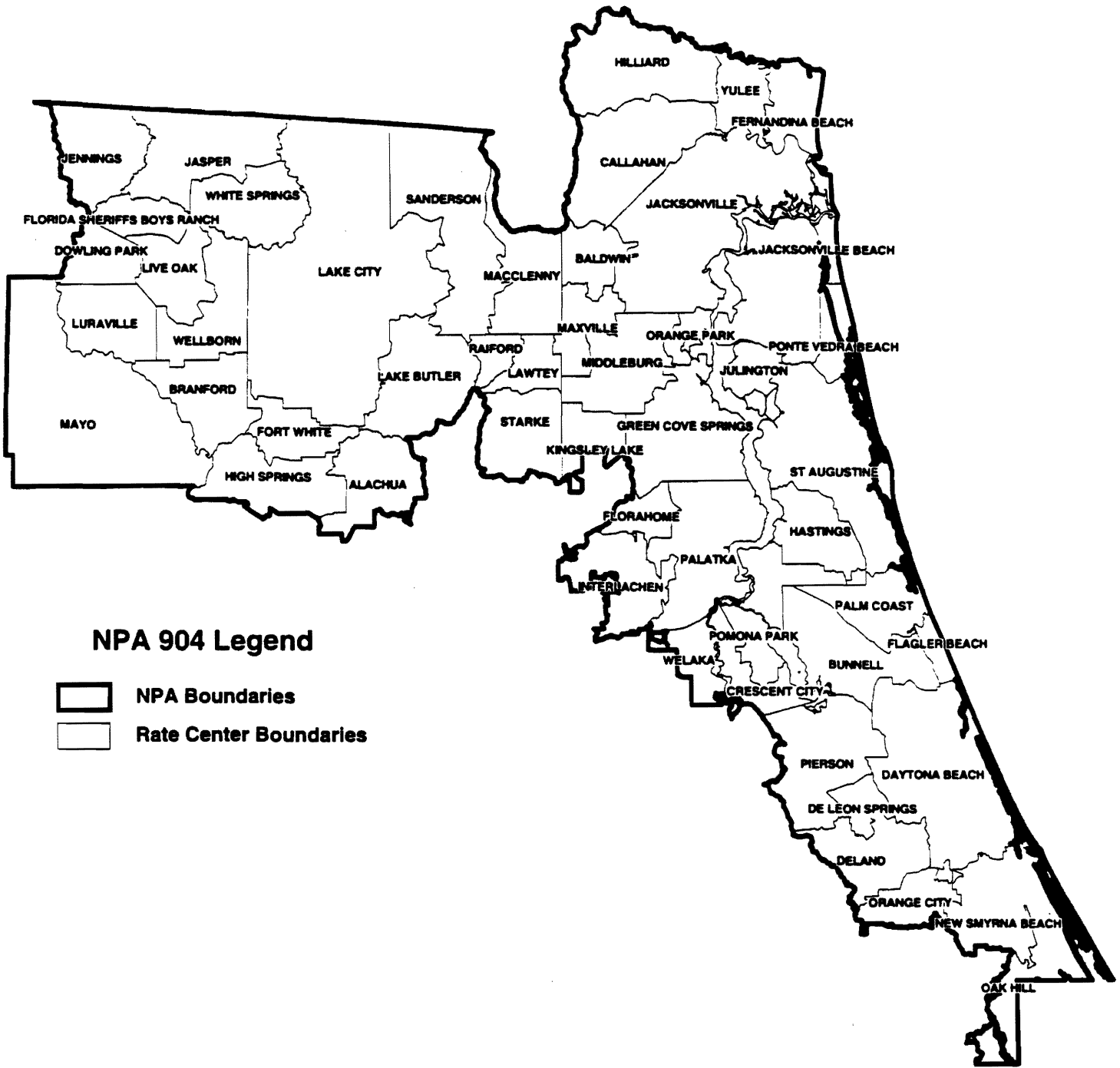
FLORIDA 904 NPA ALTERNATIVES

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 | 10.1 | | 20.3 | |
| #2 | 11.4 | 4.1 | 21.5 | 5.4 |
| #3 | 7.0 | 14.3 | 14.0 | 28.6 |
| #4 | 6.0 | 17.3 | 11.9 | 34.6 |
| #5 | 9.5 | 10.7 | 19.1 | 21.5 |
| #6 | 5.8 | 17.0 | 11.7 | 33.9 |

Assumption #1: Code growth continues at 2Q99 to 2Q01 levels.
Assumption #2: Code growth reduced by 50% beyond 4Q01.

**NPA 904 Rate Center Map
Alternative # 1
Distributed Overlay**

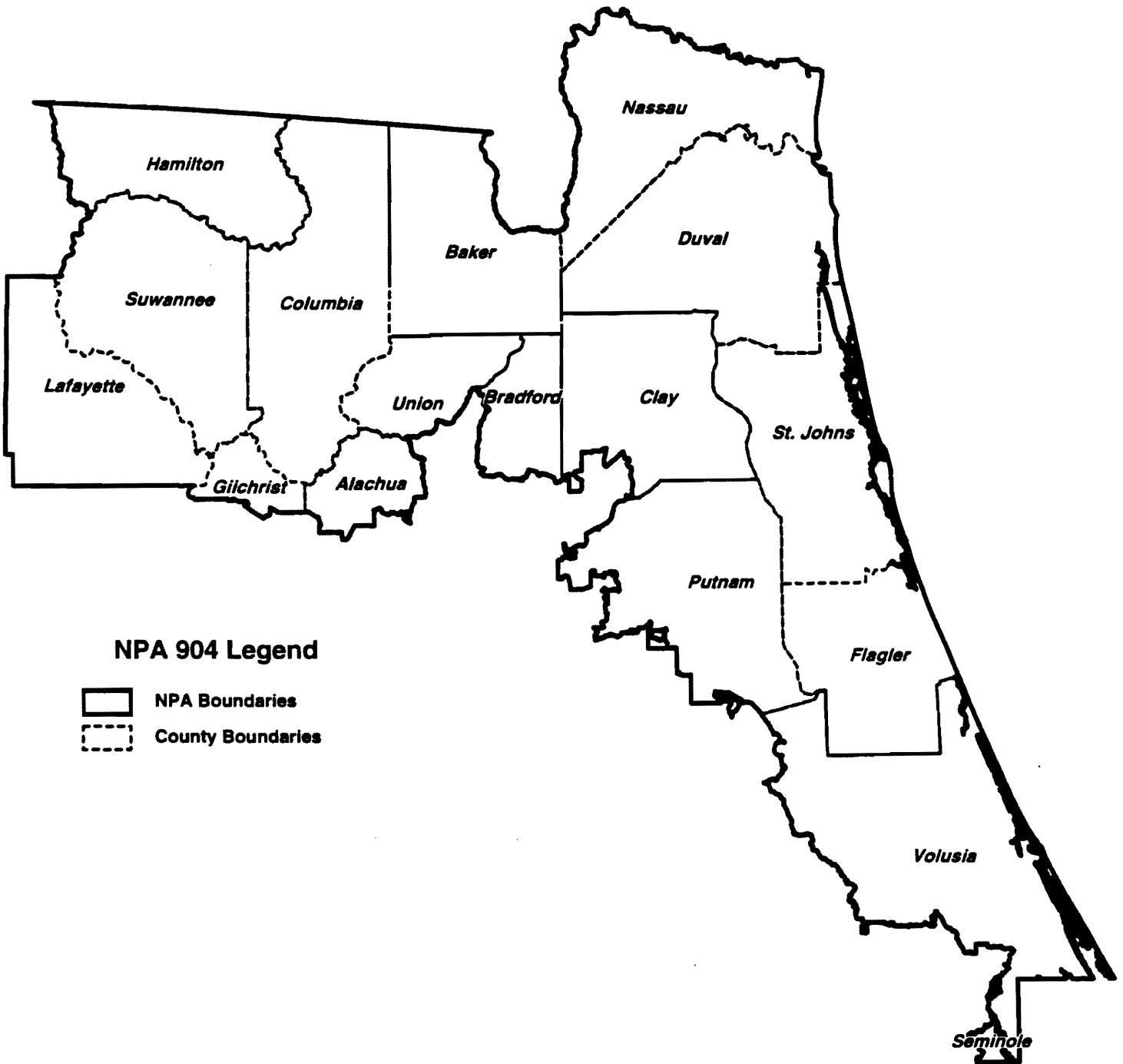


NPA 904 Legend



-  NPA Boundaries
-  Rate Center Boundaries

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 1 | PROJECTED LIVES |
| OVERLAY | 10.1 - 20.3 YEARS |

**NPA 904 County Map
Alternative # 1
Distributed Overlay**

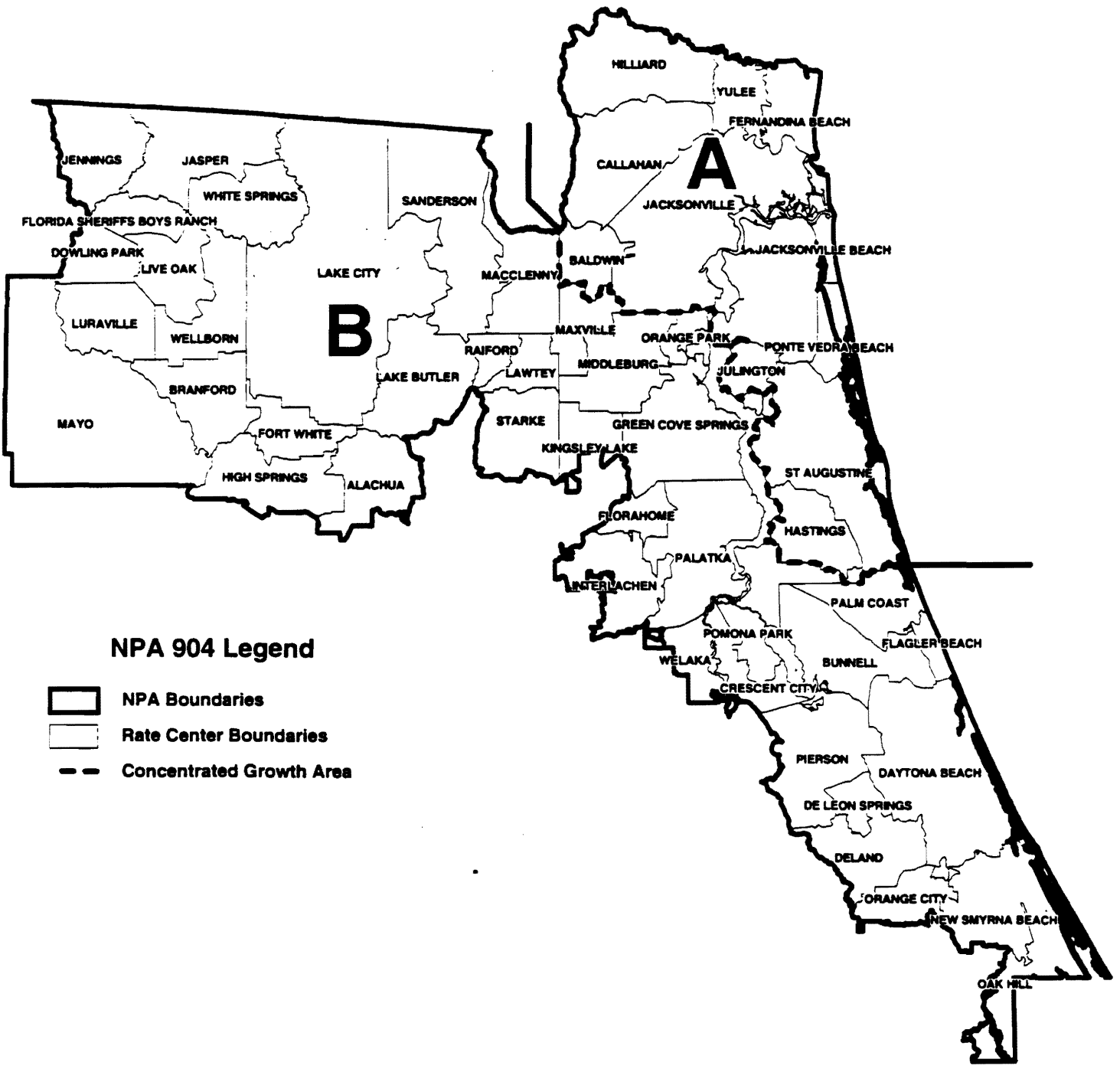


NPA 904 Legend




-  NPA Boundaries
-  County Boundaries

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 1 | PROJECTED LIVES |
| OVERLAY | 10.1 - 20.3 YEARS |

**NPA 904 Rate Center Map
Alternative # 2
Concentrated Growth Overlay**

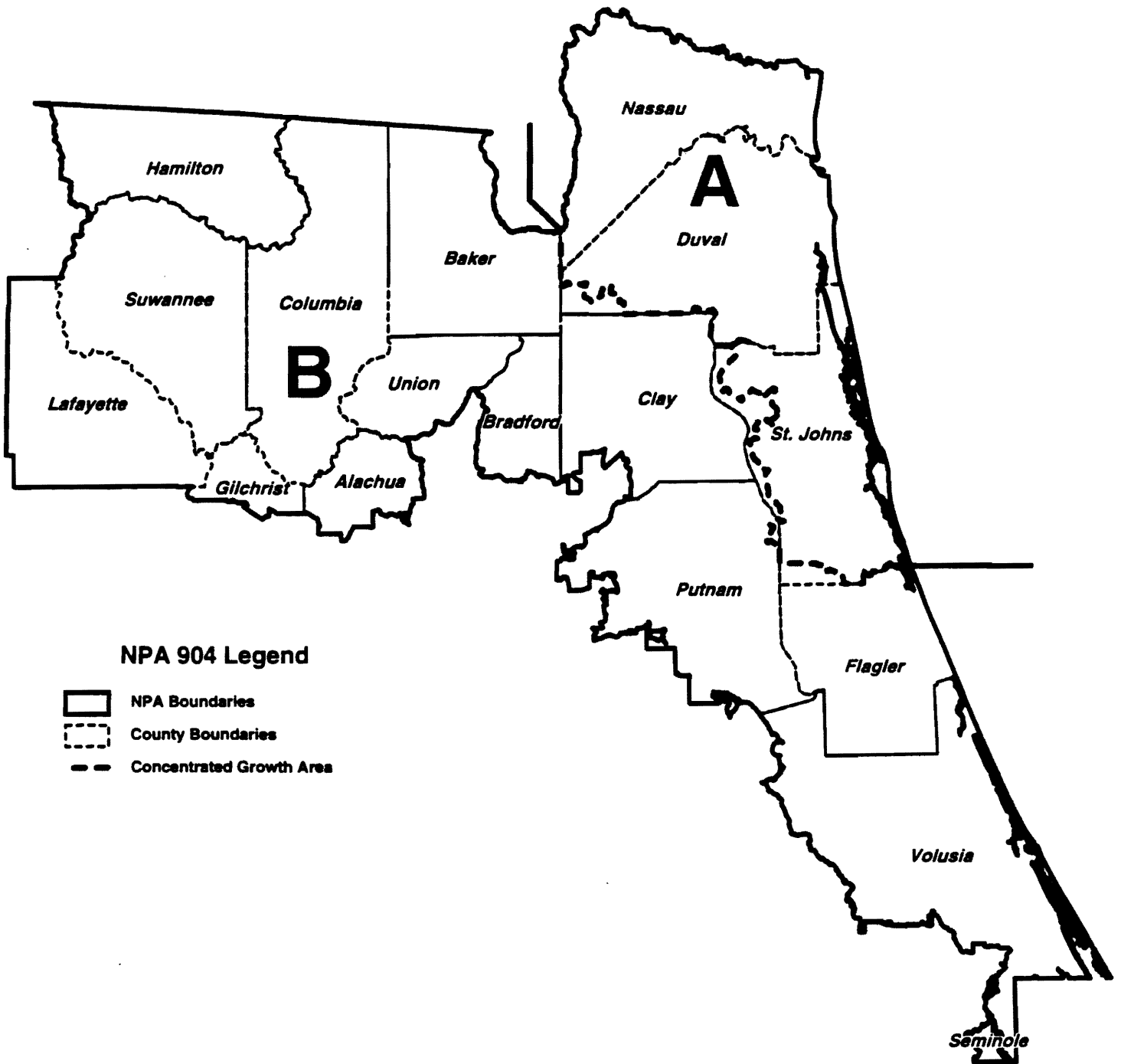


NPA 904 Legend




-  NPA Boundaries
-  Rate Center Boundaries
-  Concentrated Growth Area

| ALTERNATIVE | PROJECTED LIVES |
|-------------|-------------------|
| ALT # 2 | PROJECTED LIVES |
| AREA "A" | 11.4 - 21.5 YEARS |
| AREA "B" | 4.1 - 5.4 YEARS |

**NPA 904 County Map
Alternative # 2
Concentrated Growth Overlay**



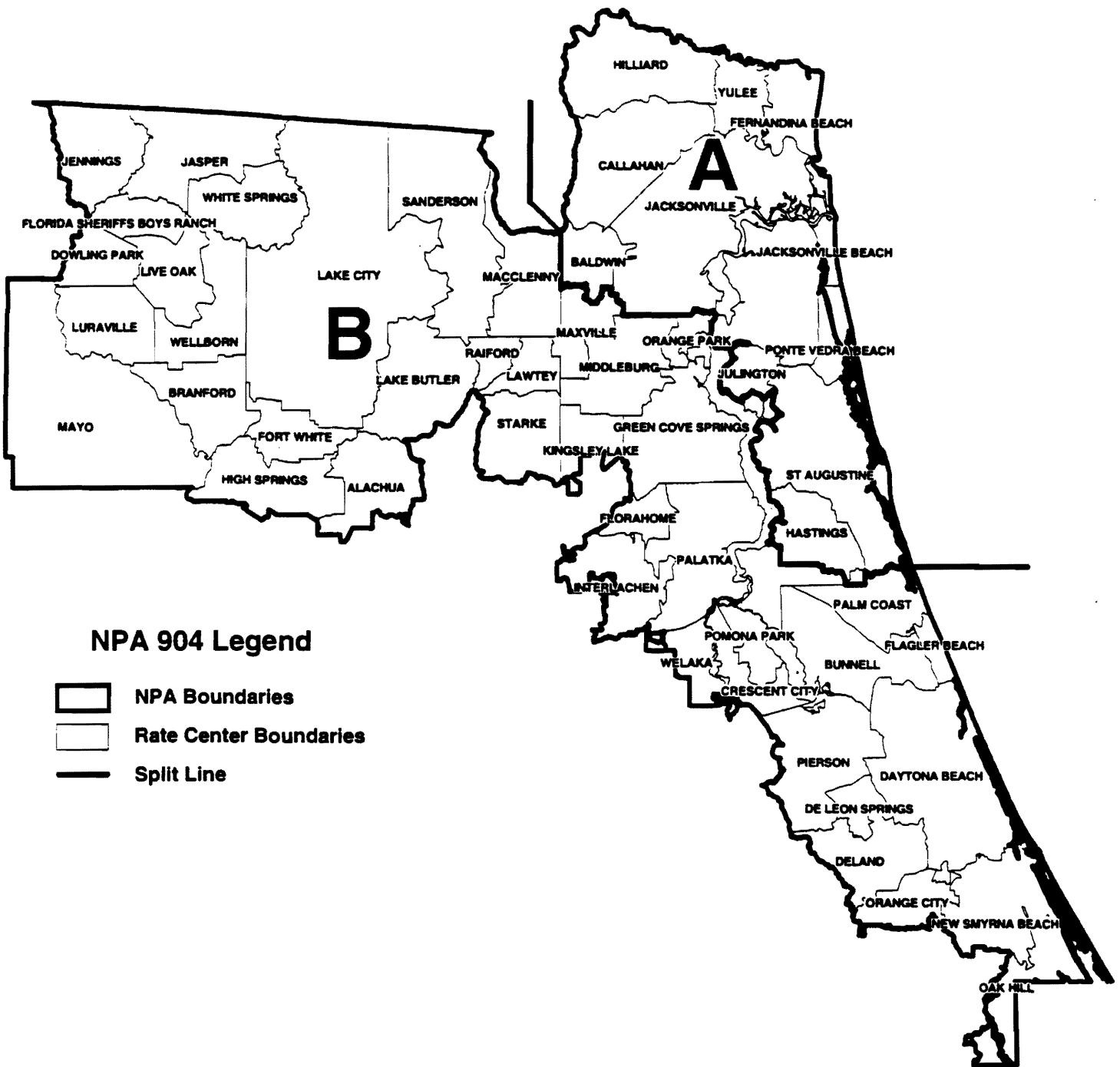
NPA 904 Legend

-  NPA Boundaries
-  County Boundaries
-  Concentrated Growth Area




| ALTERNATIVE | PROJECTED LIVES |
|-------------|-------------------|
| ALT # 2 | PROJECTED LIVES |
| AREA 'A' | 11.4 - 21.5 YEARS |
| AREA 'B' | 4.1 - 5.4 YEARS |

**NPA 904 Rate Center Map
Alternative # 3
Geographic Split**

LOCKHEED MARTIN

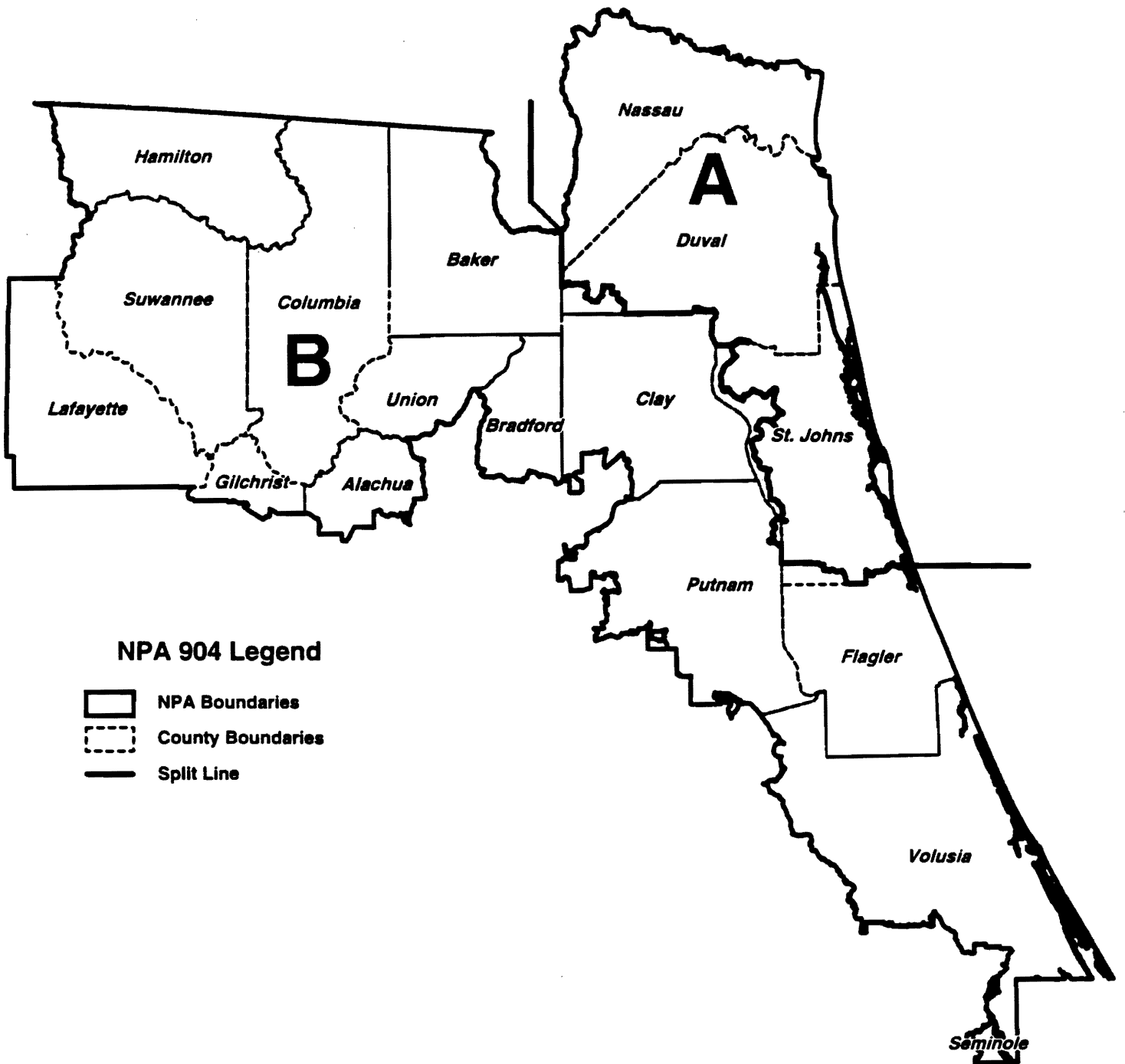


NPA 904 Legend




-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 3 | PROJECTED LIVES |
| AREA 'A' | 7.0 - 14.0 YEARS |
| AREA 'B' | 14.3 - 28.6 YEARS |

**NPA 904 County Map
Alternative # 3
Geographic Split**



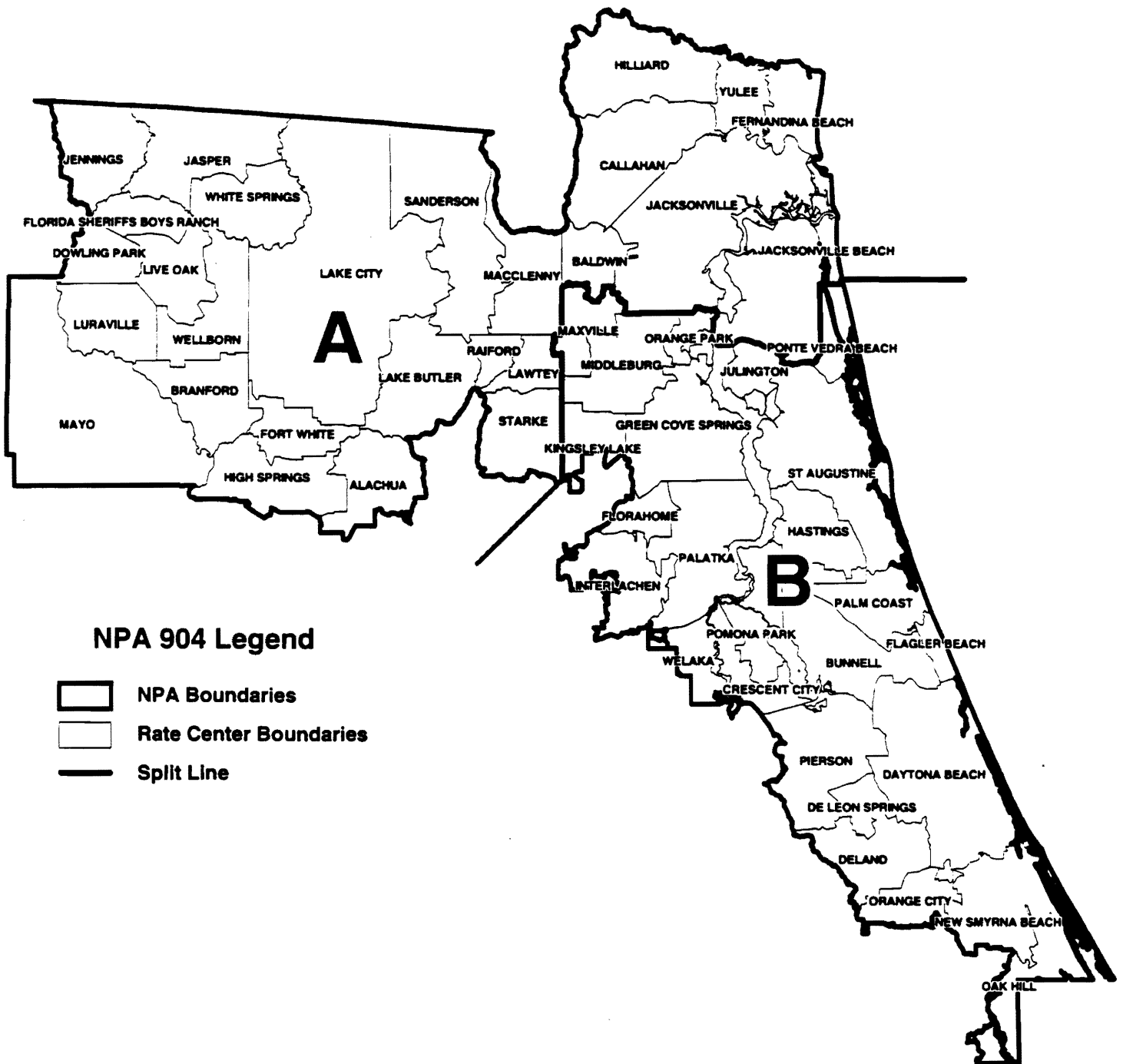
NPA 904 Legend

-  NPA Boundaries
-  County Boundaries
-  Split Line




| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 3 | PROJECTED LIVES |
| AREA "A" | 7.0 - 14.0 YEARS |
| AREA "B" | 14.3 - 28.6 YEARS |

**NPA 904 Rate Center Map
Alternative # 4
Geographic Split**

LOCKHEED MARTIN

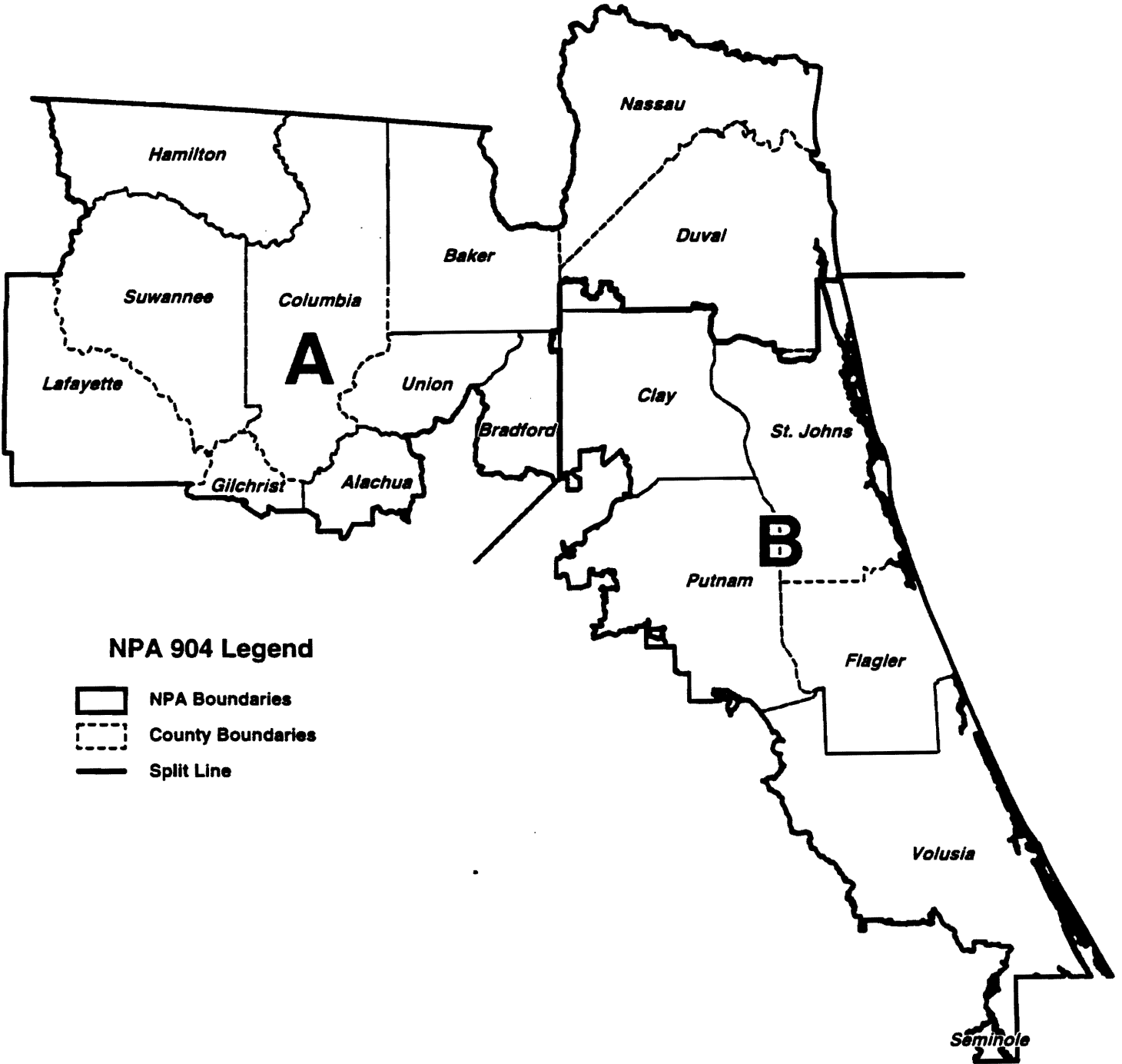


NPA 904 Legend




-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 4 | PROJECTED LIVES |
| AREA "A" | 6.0 - 11.9 YEARS |
| AREA "B" | 17.3 - 34.6 YEARS |

**NPA 904 County Map
Alternative # 4
Geographic Split**

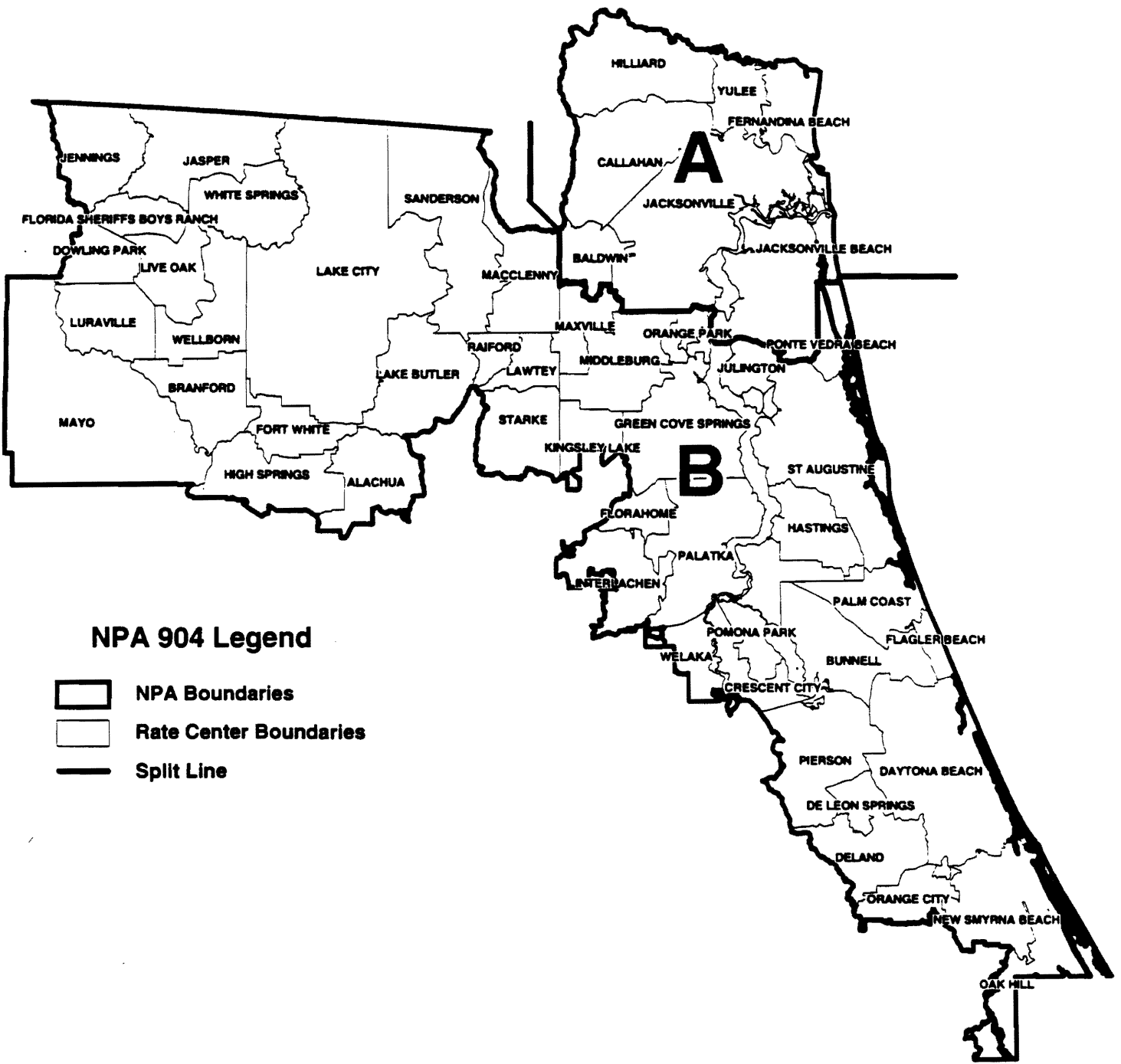


NPA 904 Legend




-  NPA Boundaries
-  County Boundaries
-  Split Line

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 4 | PROJECTED LIVES |
| AREA "A" | 6.0 - 11.9 YEARS |
| AREA "B" | 17.3 - 34.6 YEARS |

**NPA 904 Rate Center Map
Alternative # 5
Geographic Split**

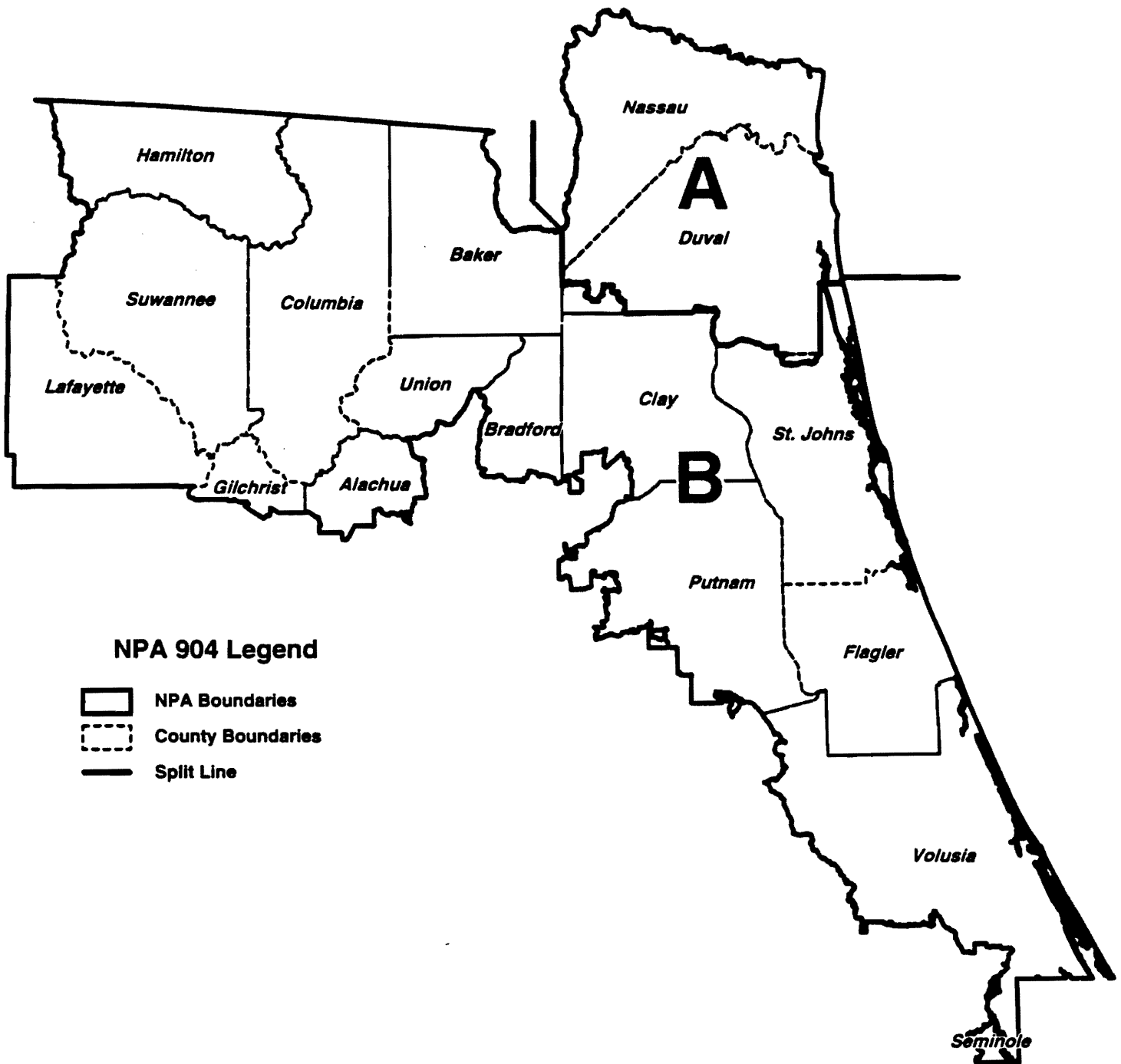


NPA 904 Legend




-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

| ALTERNATIVE | PROJECTED LIVES |
|-------------|-------------------|
| ALT # 5 | PROJECTED LIVES |
| AREA "A" | 9.5 - 19.1 YEARS |
| AREA "B" | 10.7 - 21.5 YEARS |

**NPA 904 County Map
Alternative # 5
Geographic Split**



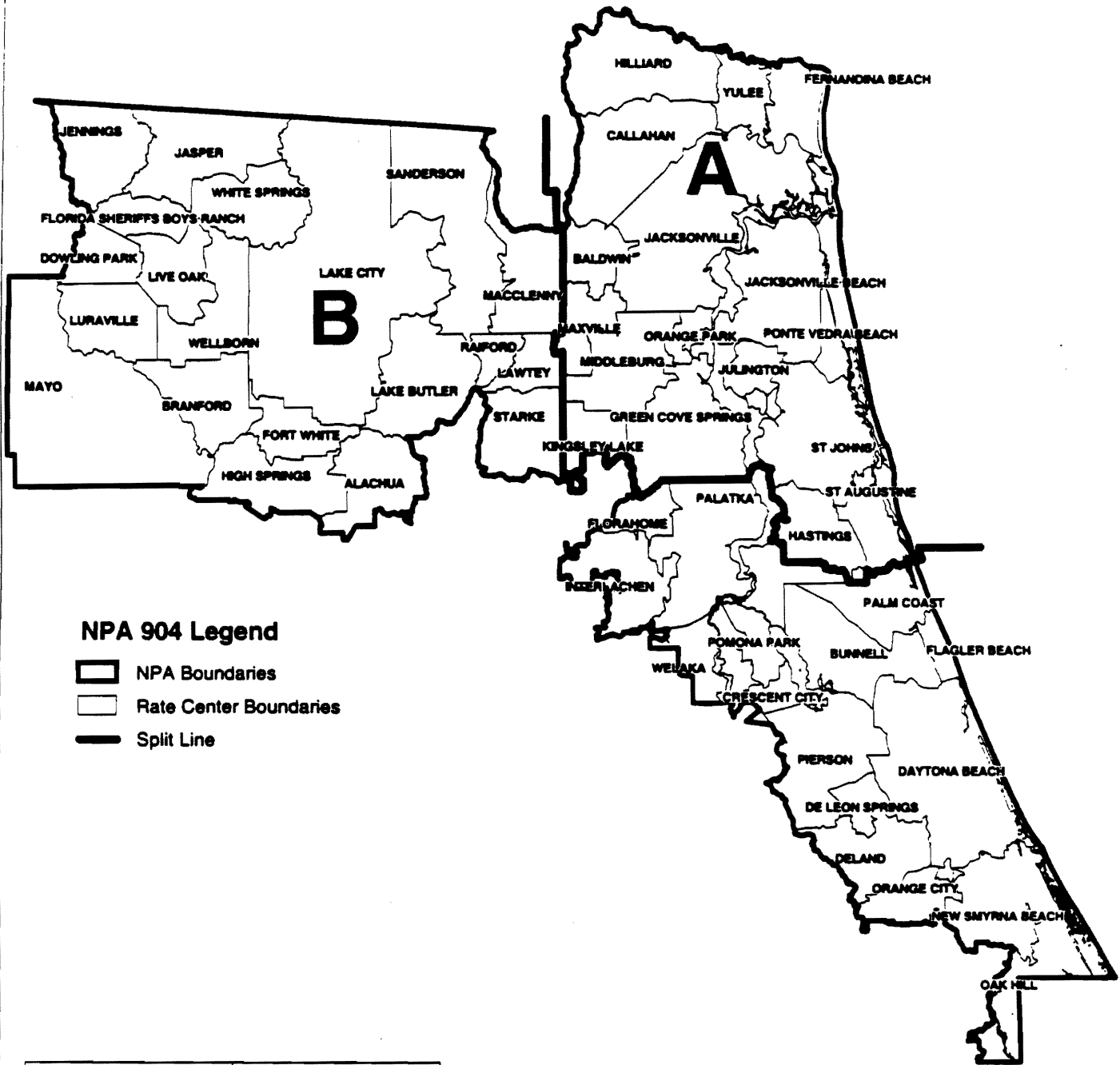
NPA 904 Legend

-  NPA Boundaries
-  County Boundaries
-  Split Line

| ALTERNATIVE | PROJECTED_LIVES |
|-------------|-------------------|
| ALT # 5 | PROJECTED LIVES |
| AREA "A" | 9.5 - 19.1 YEARS |
| AREA "B" | 10.7 - 21.5 YEARS |

**NPA 904 Rate Center Map
ALTERNATIVE #6
GEOGRAPHIC SPLIT**

LOCKHEED MARTIN

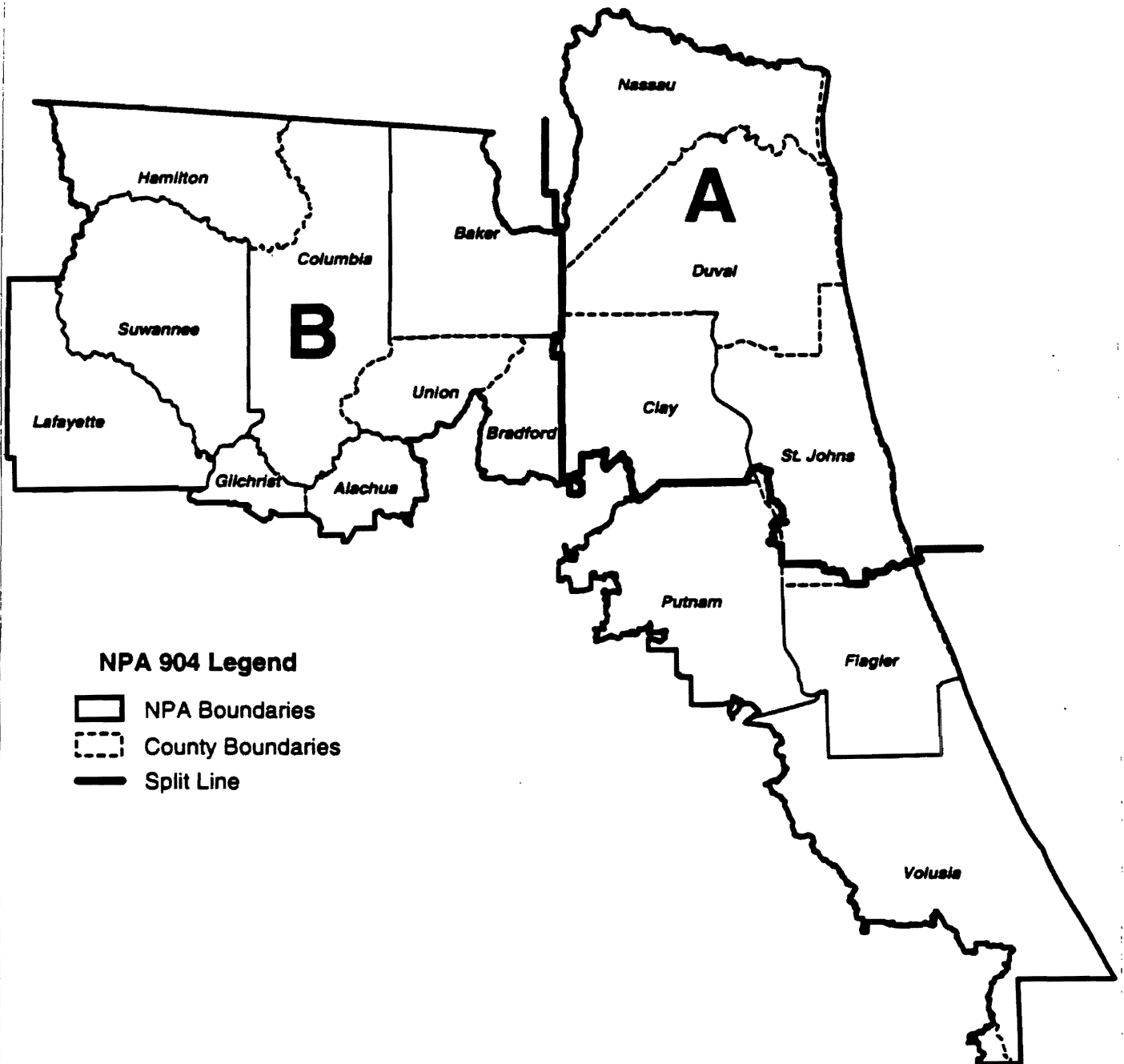


NPA 904 Legend




- NPA Boundaries
- Rate Center Boundaries
- Split Line

| ALTERNATIVES | PROJECTED_LIVES |
|--------------|-------------------|
| ALT #6 | PROJECTED LIVES |
| AREA "A" | 5.8 - 11.7 YEARS |
| AREA "B" | 17.0 - 33.9 YEARS |

**NPA 904 County Map
ALTERNATIVE #6
GEOGRAPHIC SPLIT**



NPA 904 Legend

-  NPA Boundaries
-  County Boundaries
-  Split Line

| ALTERNATIVES | PROJECTED_LIVES |
|--------------|-------------------|
| ALT #6 | PROJECTED LIVES |
| AREA "A" | 5.8 - 11.7 YEARS |
| AREA "B" | 17.0 - 33.9 YEARS |

CERTIFICATE OF SERVICE

I, James S. Bucholz, do certify that the foregoing **PETITION FOR APPROVAL OF NPA RELIEF PLAN FOR THE 904 AREA CODE** was delivered, via U.S. Mail, this 16th day of August, 1999, to the following:

Ms. Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Angela Green, General Counsel
Florida Public Telecommunications Assoc.
125 S. Gadsden St., #200
Tallahassee FL 32301-1525

D. Bruce May, Jr.
Counsel for Florida Cellular Service, Inc.
d/b/a Bellsouth Mobility
Holland & Knight, LLP
P.O. Drawer 810
Tallahassee, FL 32302

Floyd Self
Messer, Caparello & Self
P.O. Box 1876
Tallahassee, FL 32302

Mr. Richard H. Brashear
ALLTELL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060-3357

Gwen Azama-Edwards
City of Daytona Beach
P. O. Box 2451
Daytona Beach, FL 32115-2451

Fritz Behring
City of Deltona
P. O. Box 5550
Deltona, FL 32728-5550

Jim Cameron
Daytona Beach/Halifax Area Chamber of
Commerce
P. O. Box 2475
Daytona Beach, FL 32115

Michael A. Gross
Florida Cable Telecommunications Assoc.,
Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Carole Barice/James Fowler
Fowler, Barice Law Firm
28 W. Central Boulevard
Orlando, FL 32801

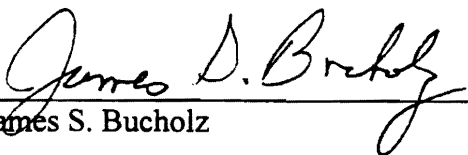
Ms. Donna C. McNulty
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32302

Ms. Deborah (Debi) L. Nobles
Northeast Florida Telephone Company,
Inc.
P. O. Box 485
Macclenny, FL 32063-0485

Robert M. Weiss
Volusia County
123 W. Indiana Avenue (Room #205)
DeLand, FL 32720

Bob Koslow
News-Journal Corp.
1200 Deltona Boulevard (Suite 51)
Deltona, FL 32725

Mr. F. B. (Ben) Poag
Sprint-Florida, Incorporated
P. O. Box 2214 (MCFLTLHO0107)
Tallahassee, FL 32316-2214


James S. Bucholz

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that the foregoing **Direct Testimony of Thomas C. Foley** was delivered, via U.S. Mail, this 16th day of November, 1999, to the following:

AT&T Communications of the
Southern States, Inc.
Tracy Hatch/Marsha Rule
101 North Monroe Street, Ste 700
Tallahassee, FL 32301

ALLTEL Florida, Inc.
Ms. Harriet Eudy
P. O. Box 550
Live Oak, FL 32060-3357

Ausley Law Firm
Jeffrey Wahlen
P.O. Box 391
Tallahassee, FL 32302

BellSouth Mobility, Inc.
Gloria Johnson
1100 Peachtree St. NE
Suite 910
Atlanta, GA 30309-4599

BellSouth Telecommunications, Inc.
Ms. Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

City of Daytona Beach
Gwen Azama-Edwards
P. O. Box 2451
Daytona Beach, FL 32115-2451

City of Deltona
Fritz Behring
P.O. Box 5550
Deltona, FL 32728-5550

Daytona Beach/Halifax Area
Chamber of Commerce
Jim Cameron
P. O. Box 2475
Daytona Beach, FL 32115

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301

Florida Public Telecommunications
Assoc.
Angela Green, General Counsel
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Fowler, Barice Law Firm
Carole Barice/James Fowler
28 W. Central Blvd.
Orlando, FL 32801

GTE Florida Incorporated
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Holland Law Firm
Bruce May
P.O. Drawer 810
Tallahassee, FL 32302

Lockheed Martin IMS/NANPA
Thomas Foley
820 Riverbend Blvd.
Longwood, FL 32779

Lockheed Martin IMS
D. Wayne Milby
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005

MCI WorldCom, Inc.
Mr. Brian Sulmonetti
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

News-Journal Corp.
Bob Koslow
Southwest Volusia Bureau
1107 Saxon Blvd.
Orange City, FL 32763

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Mr. & Mrs. Richard Rubino
6931 N. Oceanshore Blvd.
Palm Coast, FL 32137

Sprint PCS
Joe Assenzo
Legal Department
4900 Main, 11th Floor
Kansas City, MO 64112

Time Warner Communications
Carolyn Marek, VP, Regulatory
Affairs
Southeast Region
233 Bramerton Court
Franklin, TN 37069

MCI WorldCom
Ms. Donna C. McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Messer Law Firm
Floyd Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301-1876

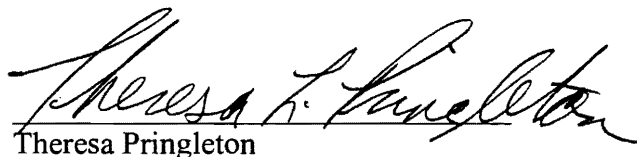
Northeast Florida Telephone
Company
Ms. Deborah (Debi) L. Nobles
P.O. Box 485
Macclenny, FL 32063-0485

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32301

Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302

Sprint-Florida, Incorporated
Charles Rehwinkel/Susan Masterson
P.O. Box 2214
Tallahassee, FL 32316-2214

Volusia County
Robert M. Weiss
123 W. Indiana Ave. Room #205
DeLand, FL 32720


Theresa Pringleton

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that the foregoing **Direct Testimony of Thomas C. Foley** was delivered, via U.S. Mail, this 16th day of November, 1999, to the following:

AT&T Communications of the
Southern States, Inc.
Tracy Hatch/Marsha Rule
101 North Monroe Street, Ste 700
Tallahassee, FL 32301

ALLTEL Florida, Inc.
Ms. Harriet Eudy
P. O. Box 550
Live Oak, FL 32060-3357

Ausley Law Firm
Jeffrey Wahlen
P.O. Box 391
Tallahassee, FL 32302

BellSouth Mobility, Inc.
Gloria Johnson
1100 Peachtree St. NE
Suite 910
Atlanta, GA 30309-4599

BellSouth Telecommunications, Inc.
Ms. Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

City of Daytona Beach
Gwen Azama-Edwards
P. O. Box 2451
Daytona Beach, FL 32115-2451

City of Deltona
Fritz Behring
P.O. Box 5550
Deltona, FL 32728-5550

Daytona Beach/Halifax Area
Chamber of Commerce
Jim Cameron
P. O. Box 2475
Daytona Beach, FL 32115

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301

Florida Public Telecommunications
Assoc.
Angela Green, General Counsel
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Fowler, Barice Law Firm
Carole Barice/James Fowler
28 W. Central Blvd.
Orlando, FL 32801

GTE Florida Incorporated
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Holland Law Firm
Bruce May
P.O. Drawer 810
Tallahassee, FL 32302

Lockheed Martin IMS/NANPA
Thomas Foley
820 Riverbend Blvd.
Longwood, FL 32779

Lockheed Martin IMS
D. Wayne Milby
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005

MCI WorldCom, Inc.
Mr. Brian Sulmonetti
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

News-Journal Corp.
Bob Koslow
Southwest Volusia Bureau
1107 Saxon Blvd.
Orange City, FL 32763

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Mr. & Mrs. Richard Rubino
6931 N. Oceanshore Blvd.
Palm Coast, FL 32137

Sprint PCS
Joe Assenzo
Legal Department
4900 Main, 11th Floor
Kansas City, MO 64112

Time Warner Communications
Carolyn Marek, VP, Regulatory
Affairs
Southeast Region
233 Bramerton Court
Franklin, TN 37069

MCI WorldCom
Ms. Donna C. McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Messer Law Firm
Floyd Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301-1876

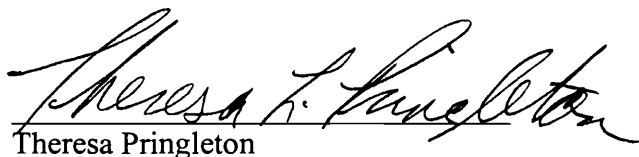
Northeast Florida Telephone
Company
Ms. Deborah (Debi) L. Nobles
P.O. Box 485
Macclenny, FL 32063-0485

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32301

Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302

Sprint-Florida, Incorporated
Charles Rehwinkel/Susan Masterson
P.O. Box 2214
Tallahassee, FL 32316-2214

Volusia County
Robert M. Weiss
123 W. Indiana Ave. Room #205
DeLand, FL 32720


Theresa Pringleton