State of Florida

Public Service Commission

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

DATE: September 14, 2000

TO: Division of Records and Reporting (Bayo)

FROM: Division of Competitive Services (İleri, Audu, Barrett)
Division of Legal Services (B. Keating, Vaccaro, Fordham)

RE: Docket No. 990455-TL, Numbering Plan Relief for the 305/786 Area Code, Docket No. 990456-TL, Numbering Plan Relief for the 561 Area Code, Docket No. 990457-TL, Numbering Relief Plan for the 954 Area Code, and Docket No. 990517-TL, Numbering Relief Plan for the 904 Area Code

On August 24, 2000, staff filed a composite recommendation regarding the above dockets. The recommendation was originally scheduled to be heard at the September 5, 2000 agenda conference, but because of the complexity and time required to address the recommendation, a special agenda has been set for September 29, 2000.

Subsequent to filing the recommendation, staff was informed that a pertinent fact was omitted from the analysis section related to staff's recommended alternative in Docket No. 990517-TL, Numbering Relief Plan for the 904 Area Code. As indicated in the record, staff's recommended alternative will require some customers to change their full seven-digit phone number. To provide the Commissioners the facts necessary to make a fully informed decision, staff is revising the recommendation to incorporate this information.

Staff is also correcting typographical errors and clarifying statements made within the recommendation. While a new recommendation is being filed, the only changes made to the original recommendation are:

Page 13	Verbiage changes are shaded
Page 31 & 36	Verbiage changes are shaded and struck through
Page 54 & 55	Verbiage changes are shaded and struck through
Page 59 - 61	Verbiage changes are shaded
Page 105	Verbiage changes are shaded and struck through
Page 109 - 111	Verbiage changes are shaded and struck through

If you have any questions, please call Levent İleri at 413-6562.

cc:
Chairman Deason
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REVISED 9/15/00

State of Florida

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: SEPTEMBER 15, 2000

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF COMPETITIVE SERVICES (İLERİ, AUDU, BARRETT)
DIVISION OF LEGAL SERVICES (B. KEATING, VACCARO, FORDHAM)

RE: DOCKET NO. 990455-TL - REQUEST FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 305/786 AREA CODE - DADE COUNTY AND MONROE COUNTY/KEYS REGION.

DOCKET NO. 990456-TL - REQUEST FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 561 AREA CODE.

DOCKET NO. 990457-TL - REQUEST FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 954 AREA CODE.

DOCKET NO. 990517-TL - REQUEST FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 904 AREA CODE.

AGENDA: 9/29/00 - SPECIAL AGENDA - POST HEARING DECISION - PARTICIPATION IS LIMITED TO COMMISSIONERS AND STAFF

CRITICAL DATES: 10/1/01 (EXHAUST DATE[1] FOR THE 305 AREA CODE)
10/1/04 (EXHAUST DATE FOR THE 305/786 AREA CODES)
10/1/02 (EXHAUST DATE FOR THE 561 AREA CODE)
1/1/02 (EXHAUST DATE FOR THE 904 AREA CODE)
10/1/02 (EXHAUST DATE FOR THE 954 AREA CODE)

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\990455.RCM

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[1]The exhaust dates are taken from the April, 2000, Central Office Code Utilization Survey (COCUS) results. (EXH 1)

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LIST OF ACRONYMS USED IN THE AREA CODE RECOMMENDATION

1KNP	Thousand-block Number Pooling
ALEC	Alternative Local Exchange Carrier
AT&T	AT&T Communications of the Southern States, Inc.
CO	Central Office
COC	Central Office Code or NXX or Prefix
Commission	Florida Public Service Commission
FCC	Federal Communications Commission
FCCA	Florida Competitive Carriers Association
FCTA	Florida Cable Telecommunications Association
FPSC	Florida Public Service Commission
ILEC	Incumbent Local Exchange Carrier
INC	Industry Numbering Committee
LATA	Local Access and Transport Area
MCI	MCI WorldCom, Inc.
MDF	Main Distribution Frame
MTE	Months-To-Exhaust
MSA	Metropolitan Statistical Area
NANP	North American Numbering Plan
NANPA	North American Numbering Plan Administration
NANPE	North American Numbering Plan Expansion
NXX	Central Office Code or Prefix
NPA	Numbering Plan Area or Area Code
NRO	Number Resource Optimization
RCC	Rate Center Consolidation

SMR	Specialized Mobile Radio
UPDO	Unified Dialing Plans for Overlays

CASE BACKGROUND

Advances in telecommunications services, as well as increased competition in local exchange markets, have led to an explosion in the demand for new telephone numbers, thereby escalating the exhaustion rate of area codes in Florida. As a result, numbering plan area (NPA or area code) exhaustion is problematic. This recommendation addresses NPA relief plans for the 305, 786, 561, 954, and 904 area codes.

305/786 Area Codes

On January 6, 1998, in Docket No. 971058-TL, the Florida Public Service Commission (FPSC or Commission) issued Order PSC-98-0040-FOF-TL, in which it required that 20 of the remaining Central Office Codes[2] (COCs or NXXs) in the 305 area code be reserved for use in Monroe County. The Order stated that these 20 NXXs were calculated at a usage rate of 1.2 NXXs per year to last until the year 2012 for the residents of the Keys. In early 1999, the North American Numbering Plan Administration (NANPA or NeuStar) informed staff that it had already assigned approximately nine of the 20 NXXs in only 13 months. This accelerated assignment of NXXs, which far exceeded the usage rate contemplated in the Order, forced an extraordinary jeopardy situation in the 305 Keys area.

At the March 30, 1999, Agenda Conference, in Docket No. 990373-TP, NANPA indicated that all the NXXs in the Keys were assigned to telecommunications carriers. By Order No. PSC-99-0606-PCO-TP, issued April 2, 1999, the Commission set for hearing the issue of whether code holders should be required to distribute telephone numbers consecutively. Later, the industry voluntarily donated some of the unused NXXs back to NANPA. At the same time, NANPA released the reserved NXX codes from the 305/786 area (Dade County). Thus, the Keys had a total of 20 remaining NXXs in mid-April of 1999.

The industry planned to meet on April 23, 1999, to discuss the jeopardy procedures to distribute the last remaining 20 NXXs. On April 22, 1999, the Commission staff sent a letter to the NANPA director asking NANPA to freeze the distribution of the NXXs. On April 23, 1999, the industry met and discussed the staff's letter. The industry agreed to comply with the Commission staff's request

[2]Central Office Codes or NXXs are defined as the first three digits of a telephone number or the prefix. N can take any integer digit from 2 to 9, and X can take any integer digit from 0 to 9.

to extend the freeze with the exception that a new carrier with no codes associated with the rate centers in the Keys would be allocated one central office code (NXX). Thus, under the direction of NANPA, the telecommunications industry NXX code holders in the 305 Keys region returned some NXX codes to NANPA and reached a consensus to institute a freeze on the distribution of the remaining NXX codes in the 305 Keys region until either further extraordinary jeopardy measures could be put in place, or the Commission could approve an NPA relief plan for the 305 Keys region. Subsequently, further jeopardy measures were implemented to preserve the remaining NXX codes. A lottery system was instituted for this region, which included the rationing of one NXX code per month. Therefore, the Commission staff opened Docket No. 990455-TL to investigate the proposed numbering relief plans. Since NPA relief for this area may include or affect the portion of the 305 area code overlaid by the 786 area code (the Dade County area), this recommendation addresses NPA relief for the entire 305 area code, including both the Dade County and Keys regions.

561, 954, and 904 Area Codes

On March 8, 1999, NANPA declared extraordinary jeopardy for the 561 and 954 area codes, and notified the Commission and the industry pursuant to Interim Jeopardy Procedures. Thereafter, on April 21, 1999, NANPA notified the Commission that the 904 area code was also in extraordinary jeopardy. Therefore, the Commission staff opened Dockets Nos. 990456-TL, 990457-TL, and 990517-TL to review the proposed numbering relief plans.

Under the direction of NANPA, the telecommunications industry NXX code holders in the 561, 954, and 904 NPAs adopted Final Jeopardy Procedures and reached a consensus to institute rationing of the distribution of the remaining NXX codes in these NPAs. Code rationing was set at six codes per month, beginning May 1999 for the 561 and 954 area codes, and July 1999 for the 904 area code. On October 21, 1999, the FCC issued FCC 99-243 in Docket No. 96-98; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996. In this Order, the FCC revised the guidelines "by eliminating the requirement that an area code overlay plan include the assignment of at least one central office code (NXX code) to each new entrant that had no NXX codes in the original area code 90 days before introduction of the new overlay code." NANPA conducted another meeting to release the reserved codes. Thus, the new rationing procedure for the 954, 561, and 904 area codes are six, seven, and seven NXX codes per month, respectively. These rationing procedures will continue until NPA

relief plans for each of these NPAs are approved by the Commission.

Pursuant to the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016), the NPA Relief Planner for the Eastern Region of the North American Numbering Plan (NANP), notified the Commission staff, the code holders and other industry members, and hosted an industry meeting to review the alternative relief plans. The industry reached a consensus to recommend Alternative Relief Plan #1, an all-services overlay, as the method of relief for the 305/786, 561, 954, and 904 area codes. Later, NANPA notified the Commission regarding the industry's recommended alternative plan for all the area codes in this proceeding.

The Commission scheduled several service hearings[3] in each docket. The notice of service hearings and the industry's consensus plan were printed in the news media, attracting a great deal of public interest in this matter. Based on public input, the list of alternative relief plans for all of the area codes in this proceeding was expanded. Therefore, staff has suggested additional alternatives for each of the area codes as indicated in the following table:

Area Code	Industry's Alternatives	Additional Staff Alternatives	Total Number of Alternatives
305/786	5	8	13
561	5	7	12
954	2	2	4
904	6	11	17

All alternatives for each NPA relief are described in staff's analysis in Issue 1.

Furthermore, in view of the related subject matter of these dockets and in the interest of administrative efficiency, these dockets were consolidated for hearing purposes only. In addition, technical hearings in these proceedings were scheduled to be held on May 18 and 19, 2000. After the service hearings were held, the parties agreed that the exhibits, and testimonies for the May 18,

[3]In this recommendation, citations to the service and technical hearing transcripts will be identified with hearing date and time followed by the transcript page, unless otherwise specified.

2000, technical hearing would be entered into the record by stipulation and that cross-examination would be waived. The Commission accepted this suggestion and concluded the technical hearing on May 18, 2000.

FEDERAL BACKGROUND

As part of its ongoing effort to conserve area codes, on April 2, 1999, the Commission filed a petition with the Federal Communications Commission (FCC) seeking authority to implement number conservation measures, which would help minimize consumer confusion and expenses associated with imposing new area codes too frequently.

On September 15, 1999, the FCC issued an Order (FCC 99-249, Florida Order) granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures.[4] In its Order, the FCC granted the Commission interim authority to:

(1) Institute thousand-block pooling (1KNP) by all LNP[5]-capable carriers in Florida;
(2) Reclaim unused and reserved NXX codes;
(3) Maintain rationing procedures for six months following area code relief;
(4) Set numbering allocation standards;
(5) Request number utilization data from all carriers;
(6) Implement NXX code sharing; and
(7) Implement rate center consolidation.

In Dockets Nos. 990373-TP and 981444-TP, the Commission investigated various number conservation measures. Subsequent to the issuance of FCC's Florida Order, the Commission issued several orders in Docket No. 981444-TP to conserve telephone numbers. The FCC's most recent numbering order is FCC 00-104. Staff will address these within the body of the staff analysis in Issues 1 and 2.

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[4]Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, NSF File No. L-99-23 (rel. September 15, 1999) (EXH 1)

[5]LNP (Local Number Portability) is a service that provides residential and business telephone customers with the ability to retain, at the same location, their existing local telephone numbers when switching from one local telephone service provider to another. (EXH 1)

AREA CODE RELIEF PLAN SELECTION CRITERIA

Staff has identified various measures for the selection of possible area code relief alternatives. In addition, staff used the following criteria to select all possible and reasonable alternatives to recommend to the Commission in this proceeding:

1. Severe imbalances in projected life exhaustion are avoided, pursuant to the INC Guidelines. (EXH 1) For example, a difference of 15 years[6] and more is not reasonable, and therefore may be eliminated.

2. Relief plans involving splitting rate centers are eliminated, pursuant to INC Guidelines. (EXH 1)

3. Area code life projections with less than 5 years may not be considered, pursuant to INC Guidelines. (EXH 1; Eudy TR 117)

4. In the case of split relief plans, the consideration may be given to alternatives with approximately equal lives, not exceeding 15 years[6] pursuant to INC Guidelines. (EXH 1; TR Eudy 117)

5. Public input within a particular area code is considered. (EXH 1; EXH 2; EXH 7)

6. Severe disruption of community of interest or calling scope in relief plans is generally avoided. (EXH 2; EXH 7; EXH 8)

7. Use of more than one area code is not an efficient use of numbering resources, and therefore staff does not recommend such alternatives, unless there is no other alternative to resolve the numbering relief in that area. (EXH 1)

[6]The INC Guidelines' 15 year limit do not take into account the effect number conservation measures.

8. Implementation of various number conservation measures in area code relief plans are generally considered helpful. (EXH 1; EXH 7)

9. Alternatives with less impact on customers and industry are considered preferable. (EXH 1; EXH 2; EXH 7; Eudy TR 117)

In conclusion, this recommendation addresses which relief plans the Commission should implement, what number conservation measures the Commission should implement pursuant to the FCC's Florida Order 99-249 and FCC Number Resource Optimization Order 00-104, what specific dialing patterns, and what implementation time frames should apply in order to make calls within the affected area codes.

JURISDICTION

This Commission has jurisdiction to address these issues pursuant to and in accordance with 47 U.S.C. §151 et. seq., 47 C.F.R. §§ 52.3 and 52.19, FCC Order 99-249, and FCC Order 00-104. In accordance with 47 C.F.R. §52.3:

> The Commission (FCC) shall have exclusive authority over those portions of the North American Numbering Plan (NANP) that pertain to the United States. The Commission may delegate to the States or other entities any portion of such jurisdiction.

Furthermore, 47 C.F.R. § 52.19 provides, in part, that:

> (a) State commissions may resolve matters involving the introduction of new area codes within their states. Such matters may include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education and notification efforts regarding area code changes.
>
> (b) State commissions may perform any or all functions related to initiation and development of area code relief plans, so long as they act consistently with the guidelines enumerated in this

> part, and subject to paragraph (b)(2) of this section. For the purposes of this paragraph, initiation and development of area code relief planning encompasses all functions related to the implementation of new area codes that were performed by central office code administrators prior to February 8, 1996. Such functions may include: declaring that the area code relief planning process should begin; convening and conducting meetings to which the telecommunications industry and the public are invited on area code relief for a particular area code; and developing the details of a proposed area code relief plan or plans.

As noted in the previous section, the FCC issued FCC Order 99-249 on September 15, 1999, granting this Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures. Therein, the FCC granted the Commission interim authority to:

(1) Institute thousand-block pooling (1KNP) by all LNP-capable carriers in Florida;
(2) Reclaim unused and reserved NXX codes;
(3) Maintain rationing procedures for six months following area code relief;
(4) Set numbering allocation standards;
(5) Request number utilization data from all carriers;
(6) Implement NXX code sharing; and
(7) Implement rate center consolidation.

REVISED 9/15/00

DISCUSSION OF ISSUES

ISSUE 1: a) Should the Commission approve the industry's consensus relief plans, and

b) If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:

A) 305/786 (İLERİ)
B) 561 (İLERİ)
C) 954 (İLERİ)
D) 904 (İLERİ, AUDU, BARRETT)

PRIMARY RECOMMENDATION: Staff recommends that the Commission approve the industry's consensus relief plan for the 954 area code, and reject the industry's consensus relief plans for the 305/786, 561, and 904 area codes. Staff recommends that the Commission approve Alternative #11 for the 561 area code, Alternative #12 for the 305/786 area codes, and the modified version of Alternative #6 for the 904 area code.

ALTERNATIVE RECOMMENDATION: Staff recommends that the Commission approve the modified version of Alternative #6 for the 904 area code, with the caveat, that the Sanford exception area be excluded from the proposed 386 area code (Region B.) There are no alternative recommendations regarding the 305/786, 561, or 954 area codes.

POSITIONS OF THE PARTIES:

ALLTEL: 1a A)-C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

1a D) Yes.

1b A)-C) ALLTEL is not a party in the 305, 561, and 954 cases, so it has no position.

1b D) If the Commission declines to adopt Alternative 1, ALLTEL recommends Alternative 5, which is a geographic split with Duval and Nassau Counties as Area A and the remaining counties in the 904 NPA as Area B.

AT&T: 1a The Commission should approve the consensus relief plan (identified as Alternative #1 for each NPA in the Staff exhibit) for an overlay for each of the respective NPAs.

1b The industry consensus relief plan for each NPA represents the best means of relief, and each should be adopted. In the event the Commission rejects the consensus relief plan, the Commission should adopt the following: A) In the 305/786 NPAs, there is no other reasonable alternative; B) In the 561 NPA, Alternative 2 with Area A retaining 561; C) In the 954 NPA, there is no other reasonable alternative; D) In the 904 NPA, the concentrated growth overlay identified as Alternative #2. If that were not adopted, Alternatives #3 or #5, with Area A in either alternative retaining the 904 code.

BELLSOUTH: 1a A) Yes. In the 305/786 NPA, the Commission should order that the existing overlay be extended to the Keys area.

1a B) Yes. The Commission should order an overlay for the 561 NPA.

1a C) Yes. The Commission should order an overlay for the 954 NPA.

1a D) Yes. The Commission should order an overlay for the 904 NPA.

1b The industry's consensus relief plan for each area code will impose the least cost and inconvenience on customers alike. However, if the Commission believes it is appropriate to implement some type of a geographic split, BellSouth believes the only split option that is appropriate is Alternative 6 for the 904 area code.

DELTONA: 1a No. An overlay or additional area code in the City of Deltona would not be in the public interest. This would bring as many as four (4) area codes to the City of Deltona alone! The entire geographic area of Volusia County should be brought into a single area code.

1b The entire geographic area of Volusia County should have one single area code. All the municipalities, the County and Chamber of Commerce in Volusia County advocate for the assignment of the area code 386 ("FUN"). Alternative 16 (phased A and B) or a modified Alternative 6 would accomplish this objective.

MCI WORLDCOM: 1a A) In the 305/786 NPAs, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an expanded overlay.

1a B) In the 561 NPA, the Commission should reject the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay and instead adopt one of the geographic splits (Alternatives #2, #3, or #4).

1a C) In the 954 NPA, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay.

1a D) In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.

1b A) In the 305/786 NPAs, there is no other reasonable alternative.

1b B) In the 561 NPA, any one of the geographic splits (Alternatives #2, #3, or #4) would be appropriate.

1b C) In the 954 NPA, there is no other reasonable alternative.

1b D) In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.

NANPA: 1a Takes no position on the issue.

1b Takes no position on the issue.

NORTHEAST: 1a A)-C) Northeast is not a party in the 305, 561 and 954 cases, so it has no position.

1a D) Yes.

1b A)-C) Northeast is not a party in the 305, 561, and 954 cases, so it has no position.

1b D) If the Commission declines to adopt Alternative 1, Northeast recommends Alternative 6, modified to include Baker County in Area A.

OMNIPOINT: 1a Omnipoint supports the industry's consensus relief plan for the 954 area code.

1b A) Omnipoint supports a relief plan for the 305/786 area codes which would implement an overlay, place priority on achieving a maximum exhaust period for Dade County over Monroe County, and include implementation of rate center consolidation. Of the alternatives presented, Staff Alternative 12 best meets these objectives.

1b B) Omnipoint supports the relief plan outlined as Alternative 11 in Exhibit No. LF-3 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 561 area code.

1b C) Omnipoint supports the relief plan outlined as Alternative 3 in Exhibit No. LF-4 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 954 area code, in the event the Commission does not approve the industry consensus relief plan.

1b D) No position.

SPRINT: 1a A)-D) - Yes.

1b A)-C) No position at this time.

1b D) Sprint has no position on the alternative plans for the 904 NPA, except that, as proposed, Alternatives 4, 6 and 16B should not be adopted for the reasons stated in witness Khazraee's testimony. (TR 220-223)

VOLUSIA: 1a No. The overlay plan is harmful to Volusia County by requiring 10-digit dialing, losing a distinct geographic identity and exacerbating the

jumble of area codes in Southwest Volusia and is not really the industry consensus.

1b A split of the 904 area code to provide a single area code for all of Volusia County, particularly 386 (FUN).

STAFF ANALYSIS: State commissions across the country have struggled over the past few years with the issue of whether a geographic split, or some form of area code overlay is the more appropriate method of providing relief from the exhaustion of telephone numbers within an area code. In recent years, number conservation measures, in conjunction with some form of area code relief, have been the most desirable means for providing new numbering resources by the state commissions. (EXH 1)

This proceeding is one of the most complex to date in Florida, given the number of multiple area code dockets, alternatives being considered by the Commission, and overwhelming response received from the customers. (EXH 2; EXH 7) The Commission has played an active role in planning for these necessary changes and attempting to cushion the impact on consumers by receiving input from the residents at service hearings.

The Commission conducted numerous service hearings in the 305/786, 561, 954, and 904 area codes to review and discuss the alternatives with the affected customers. The dates, times, and places of these service hearings are provided in Table 1-1 below:

Area Code	Date and Time of Service Hearing	Place of Service Hearing
305/786	3/13/00 7:00 p.m. 3/14/00 2:00 p.m.	Miami Key West
561	3/23/00 10:00 a.m. 3/23/00 2:00 p.m. 3/24/00 10:00 a.m.	West Palm Beach West Palm Beach Ft. Pierce
954	1/19/00 10:00 a.m.	Ft. Lauderdale
904	1/26/00 10:00 a.m. 1/26/00 6:00 p.m. 1/27/00 10:00 a.m. 1/27/00 4:00 p.m. 1/28/00 10:00 a.m.	Lake City Jacksonville Daytona Beach St. Augustine Deltona

Table 1-1: Date, Time, and Place of Service Hearings by Area Code

The NANPA and the industry utilize the NPA Code Relief Planning and Notification Guidelines to identify relief alternatives for area codes nearing exhaustion. The Industry Numbering Committee (INC) issued the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016) in November of 1999. (EXH 1) Staff presents the definitions of relief alternatives with their advantages and disadvantages in Attachment 1, as currently defined by the INC. (EXH 1)

NANPA witness Tom Foley indicates that the first consideration in area code relief planning is to review the projected exhaust dates of NXX codes and to evaluate possible alternative means of providing relief. (TR 23) In his testimony, witness Foley states that NANPA filed petitions for the 305/786, 561/954, and 904 area codes with the Commission on July 6, 1999, August 11, 1999, and August 16, 1999, respectively. (TR 23) In these petitions, NANPA states that the industry's proposal for all the area codes in this proceeding is Alternative #1. This alternative is an all services, distributed overlay relief plan, in which all locals calls will be 10-digit dialed.

In earlier NANPA petitions, NANPA stated that if there were a way to split the area code based on the geographic area (rate centers (exchanges), county boundary lines, or Local Access and Transport Area (LATA) boundary lines), then it would be ideal to create two regions with approximately equal life spans. (EXH 1)

During this proceeding, 46 area code relief options were considered for the relief of the 305/786, 561, 954, and 904 area codes. (EXH 7) Each alternative plan is presented, along with a brief description including the expected life in years based on Assumption #1[7] as presented by NANPA. Schematic views are provided for all the alternatives in Attachments 2 through 5.

[7]Assumption #1 is that the current demand for central office codes will continue at approximately the same rate. (EXH 3)

A. Analysis of the 305/786 Area Codes

Before the service hearings took place, there were five alternatives. The majority of the public testimony indicated that the residents of the Keys (North Key Largo, Key Largo, Islamorada, Marathon, Big Pine Key, Sugar Loaf Key, and Key West exchanges) would prefer to retain the 305 area code for tourism reasons and keep 7-digit local dialing. (3/14/00 TR 17, 32) To incorporate customers' concerns, staff witness Lennie Fulwood introduced eight additional alternatives for a total of 13 relief plan alternatives. (EXH 7)

Discussion of Alternatives for the 305/786 Area Codes[8]:

Alternative #1 is the industry consensus relief plan. This plan is an all services expanded overlay and does not require a new area code, but rather, extends the existing 786 area code from the Miami-Dade area to include the entire region (Region A). This plan would not involve any number changes for existing subscribers. All customers in the Keys region would have to dial 10 digits for all of their local calls, as in Miami. The projected exhaust for this plan is 3.4 years. (EXH 7)

BellSouth witness Daniel M. Baeza states that the institution of 10-digit dialing for the entire area would maintain the dialing parity. (TR 153-154) Witness Baeza further states ". . . [a]n overlay allows for the easiest and most expeditious implementation method from both a technical perspective and a customer education perspective and the best and simplest migration path to future NPA relief by assuming the elimination of number changes and the associated costs and confusion." (TR 153-154)

In his testimony, BellSouth witness Stan Greer states that "[T]he disadvantage of the geographic split, you have a shrinkage of geography and a smaller and smaller area that maintains an area code increasing interNPA dialing with surrounding areas, which is done on a ten-digit basis." (EXH 6) Thus, staff infers from witness Greer's testimony that a geographic split relief plan could be the best alternative for larger areas so that the customers could still retain 7-digit local dialing without any confusion. Staff agrees, however, that for small areas geographic split relief plans may not be an ideal solution. Staff notes that during the service hearings, customers stated that they would prefer a plan in which they would

[8]For accuracy of reading the Regions A, B, and C, staff recommends that the Commission refer to Attachment 2 for the 305/786 area code alternatives.

retain their area code in conjunction with their 7-digit local dialing. (3/14/00 TR 17, 32) Because the life of this plan is only 3.4 years, further relief may be required sometime in 2001. Based on the evidence provided by the customers during the service hearings, staff believes that due to the high influx of local and long distance companies in the Miami-Dade and the Keys areas, the life of the 786 area code could decrease significantly. (EXH 1; EXH 2) Therefore, staff does not recommend this alternative.

Alternative #2 is similar to Alternative #1. The present 786 NPA code is extended to the Keys region as an expanded overlay, but upon the exhaust of the 786 NPA, a new NPA code would be overlaid over the entire region (Region A). This plan would not involve any number changes for existing subscribers. All customers in the Keys region would have to dial 10 digits for all of their local calls, as in Miami. The projected exhaust for this plan is 7.8 years.

NANPA witness Tom Foley states that the industry, by consensus, eliminated this alternative because it required that relief be provided in two phases. (TR 25) Witness Foley defines this alternative as an "all services expanded overlay," which would impose an additional overlay in the future to cover the entire expanded area. (TR 25) He further states that this alternative would commit the telecommunications industry members to a relief plan which could be rendered inappropriate by the Commission's future implementation of number conservation measures. (5/18/00 TR 25)

Staff disagrees with witness Foley's statements because staff believes that this plan can accommodate any number conservation measures that the Commission may choose to implement in the future. Staff notes that rate center consolidation and number pooling could be implemented in any area code relief plan because number conservation measures are not affected by the type of area code relief. (EXH 1; EXH 6; EXH 7; EXH 8) Thus, staff is not persuaded with witness Foley's statement.

Staff notes that during the service hearings, customers stated that they would prefer a plan in which they would retain their area code in conjunction with their 7-digit local dialing. (3/14/00 TR 17, 32) This alternative would impose two new area codes (786 and a new NPA) on Keys' customers. However, this plan does not use number conservation measures. Therefore, staff does not recommend this alternative.

Alternative #3 is a combination split and expanded overlay relief plan. The Miami-Dade region (Region A) is split from the Keys

region (Region B). The NXX codes within the new area code would be allocated between the two regions, with the Keys region receiving 225 NXX codes, and the remainder going to the Miami-Dade region. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an area code change for the residents of the Keys. The projected exhaust for this plan is 7.8 years for the Miami-Dade region, and 8 years for the Keys region.

In his testimony, NANPA witness Foley stated that this alternative was eliminated by the industry due to a number of reasons. (TR 25; EXH 6) Witness Foley states that existing customers would be required to change their number. (EXH 6) Staff disagrees with witness Foley's statement because only the area code of existing customers in the Keys would change from 305 to a new NPA with this plan.

Later, witness Foley states that this alternative would take longer to implement. (TR 25) Staff does not believe that the industry's reasons to eliminate this alternative are legitimate. The only real issues staff sees in this alternative are the area code change in the Keys region and the allocation of 225 NXXs. A potential problem with this plan, however, is the allocation of NXX codes between the regions because one or more regions may consume NXXs much faster than forecasted. Staff notes that the allocation scheme did not work for this area in the past, as demonstrated by the Commission Order No. PSC-98-0812-FOF-TL. (EXH 1) Thus, staff believes that it is unlikely that it would work this time, either. Therefore, staff does not recommend this alternative.

Alternative #4 is similar to Alternative #3, with a modified allocation in which 297 NXX codes would be used in the Keys region and the remainder for the Miami-Dade region. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The projected exhaust for this plan is 7.3 years for the Miami-Dade region and 12 years for the Keys region. (EXH 7)

NANPA witness Foley states that this alternative would take longer to implement, given the low number of NXXs available in the Keys. (TR 26) A potential problem with this plan, however, is the allocation of NXX codes between the regions because one or more regions may consume NXXs much faster than forecasted. Staff notes that the allocation scheme did not work for this area in the past, as demonstrated by the Commission Order No. PSC-98-0812-FOF-TL. (EXH 1) Due to allocation of NXXs, staff does not recommend this alternative either. (TR 25)

Alternative #5 is a split plan, which divides the Miami-Dade region (Region A) and the Keys region (Region B), allocating a new NPA exclusively for the Keys region. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The projected exhaust for this plan is 4.3 years for the Miami-Dade region, and 38 years for the Keys region. (EXH 7)

NANPA witness Foley stated that the reason why the industry eliminated this alternative was because this required the assignment of an area code to the Keys region. (5/18/00 TR 27) The life of this area code for this region would be about 38 years. (EXH 7) Ideally, all of the area codes in a given region should exhaust about the same time in the case of geographic splits. According to these guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. (EXH 1) Therefore, staff does not recommend this alternative.

Alternative #6 is a split and expanded overlay combination plan that utilizes two new NPAs. A new NPA for the Miami-Dade region (Region A) would be an expanded overlay and would be implemented upon the exhaust of the 786 NPA. The Keys region (Region B) would get a second new NPA with an approximate exhaust of 38 years. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The projected exhaust for this plan is 9.3 years for the Miami-Dade region. (EXH 7)

Staff does not recommend this alternative because this option requires two new NPAs. In addition, NANPA has to follow the Industry Numbering Committee's guidelines. Ideally, all of the area codes in a given region should exhaust about the same time in the case of geographic splits. According to these guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. (EXH 1)

Alternative #7 is a combination of split and double expanded overlay relief plans. Currently, Miami-Dade uses the 305 and 786 area codes as an overlay. The Keys region uses only the 305 area code. This plan proposes that the Miami and North Dade exchanges are overlaid with a new NPA in Region A (NPA_1). The approximate exhaust for this region is 9.4 years. The Perrine and Homestead exchanges are overlaid with a different new NPA in Region B (NPA_2), and the approximate exhaust for this region is 23.2 years. The Keys region (Region C) uses some of the NXXs from NPA_2, and its

approximate exhaust is 22.5 years. (EXH 7)

BellSouth witness Stan L. Greer states that a split and double expanded overlay relief plan would be very confusing for consumers in Dade County because this plan would offset the benefit needed in the Keys. (TR 184) Staff agrees.

Although this alternative is a workable one, staff believes that this alternative would cause extreme customer confusion. Similar to Alternative #6, this alternative uses two new NPAs whose lifetimes exceed 15 years. (EXH 1) Thus, staff does not recommend this alternative, pursuant to the INC Guidelines. (EXH 1)

Alternative #8 is an expanded split plan, which divides the Miami-Dade region (Region A) and the Keys region (Region B). This plan does not require a new NPA, but rather changes the NPA for the Keys region to 941, which is the NPA for the mainland region of Monroe County. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The approximate exhaust for this plan is 4.3 years for the Miami-Dade region, and 2.5 years for the Keys region. (EXH 7)

Staff does not recommend this alternative because the relief provided by using the 941 area code would be too short. In addition, the Keys' customers indicated that they would want to keep the 305 area code for tourism reasons. (3/14/00 TR 17, 32)

Alternative #9 is similar to Alternative #8; however, using the existing 863 NPA instead of the 941 NPA. The approximate exhaust for this plan is 4.3 years for the Miami-Dade region, and 6.1 years for the Keys region. (EXH 7)

Although staff believes that this may be a workable solution, the 305 NXXs in the Keys must be replaced by the equivalent 863 NXXs. In addition, NANPA witness Tom Foley stated that this plan may result in central office code (NXX) conflicts. (EXH 6) Therefore, staff does not recommend this alternative.

Alternative #10 is similar to Alternatives #8 & #9; however, the Keys region would use a portion of the 786 NXXs from the Miami-Dade overlay region. The approximate exhaust for this plan is 3 years for the Miami-Dade and the Keys regions.

For the same reasons set forth in Alternative #8 and #9, staff does not recommend this alternative.

Alternative #11 is a combination of split and overlay plans, which is similar to Alternative #6, but uses only one NPA. This plan divides the NXX codes between the two regions and also uses number conservation measures, as discussed in Issue 2. The approximate exhaust for this plan is 14.7 years for the Miami-Dade region (Region A), and 24 years for the Keys region (Region B). (EXH 7)

With this alternative, the existing customers in the Keys area would have to change their area code, while the customers in the Miami-Dade region would not. During the service hearing, customers stated that they would prefer a plan in which they would retain their area code in conjunction with their 7-digit local dialing. (3/14/00 TR 17, 32) In addition, a potential problem with this plan, however, is the allocation of NXX codes between the regions because one or more regions may consume NXXs much faster than forecasted. (EXH 1) For this reason, staff does not recommend this alternative.

Alternative #12 is identical to Alternative #2 but incorporates number conservation measures. The approximate exhaust for this plan is 15.6 years (Region A). (EXH 7) Staff notes that the current INC Guidelines do not take into account the effect of number conservation measures, and therefore, 15.6 years is acceptable.

Staff notes that during the service hearings, customers stated that they would prefer a plan in which they would retain their area code in conjunction with their 7-digit local dialing. (3/14/00 TR 17, 32) Although this alternative would impose two new area codes (786 and a new NPA) and 10-digit dialing on Keys' customers, this plan uses number conservation measures and allows existing customers to retain their 305 area code. (3/14/00 TR 17, 32)

BellSouth witness Daniel M. Baeza states that implementing an overlay plan is the easiest and most expeditious implementation method from a technical and a customer education point of view. (TR 153-154). Witness Baeza further states that any future NPA relief for an overlay area is another overlay, and therefore the costs associated with area code changes, as well as customer confusion would be eliminated. (TR 153-154) Staff disagrees with witness Baeza, in part, because in his testimony, BellSouth witness Stan Greer states that "[T]he disadvantage of the geographic split, you have a shrinkage of geography and a smaller and smaller area that maintains an area code increasing interNPA dialing with surrounding areas, which is done on a ten-digit basis." (EXH 6) Thus, staff infers from witness Greer's testimony that a geographic split relief plan could be the best alternative for larger areas so that the customers could still retain 7-digit local dialing without

any confusion. Staff agrees, however, that for small areas geographic split relief plans may not be an ideal solution. Staff notes, however, that for small areas geographic split relief plans may not be an ideal solution, as demonstrated in PSC-98-0812-FOF-TL. (EXH 1)

Omnipoint believes that Alternative #12 is the best option because Omnipoint believes that the industry's recommended solution has a limited life span. (Omnipoint BR p. 4; EXH 16, EXH 7) Staff agrees.

Staff believes that this alternative is an acceptable relief plan because it partially meets the needs of the residents of the Keys region, and is consistent with the industry's proposal to implement an expanded overlay. With the adoption of this alternative, the current Keys residents would retain their 305 area code, which is of utmost importance to the customers as demonstrated in the service hearings. In addition, various number conservation measures would be implemented as discussed in Issue 2 to extend the life of the area codes.

Alternative #13 is a combination of split and overlay relief plans which divides the Miami-Dade region (Region A) from the Keys region (Region B). The Miami-Dade region uses the 305 and 786 NPAs, and a new NPA. The remainder of the 786 NXXs are distributed over the Keys area to last for 18.2 years. The Miami-Dade region has an approximate exhaust of 5.3 years. (EXH 7)

In this alternative, the residents of the Keys region have to change their area code, but would keep this area code through an allocation process for 18.2 years. The Miami-Dade region would not face a number change. The disadvantage of this plan is that the allocation process may not work properly. Experience for this region has shown that the demand may exceed the allocation rate, resulting in the premature exhaustion of this area code. (EXH 1) Thus, staff does not recommend this alternative.

Analysis:

1) Table 1-2 summarizes each of the preceding alternative relief plans. All calculations of years to exhaust for the regions are based on the assumption that current demand for central office codes will continue at approximately the same rate. (EXH 1; TR 192)

			Regions (years)		
Alternatives	**Type**	**Number of NPAs Needed**	**A**	**B**	**C**
1	E.O.	0	3.4		
2	E.O.	1	7.8		
3	SEO	1	7.8	8	-
4	SEO	1	7.3	12	-
5	S	1	4.3	38	-
6	SEO	2	9.3	38	-
7	SDEO	2	9.4	23.2	22.5
8	ES	0	4.3	2.5	-
9	ES	0	4.3	6.1	-
10	ES	0	3	3	-
11	SEO#	1	14.7	24	-
12	E.O. #	1	15.6		
13	ES	1	5.3	18.2	-

Table 1-2: The projected years to exhaust for all 305/786 area code relief plans

In this table, E.O. is an expanded overlay, SEO is a split with expanded overlay, S is a geographic split, SDEO is a split with double expanded overlay, ES is an expanded split, and # stands for number conservation measures.

2) With regard to the calculation of exhaust dates, NANPA witness Tom Foley states that the approximations are not accurate and cannot be relied on. (EXH 6; 1/26/00 10:00 TR 17) Witness Foley further states:

> As with all forecasting tools that are available, they are subject to a lot of error, especially out in the later years. This is the best tool that we have. It is the tool that the industry has used for

> quite a while for forecasting. It does have its shortcomings, but this is the only tool that the industry has approved for use right now as far as forecasting goes. And yes, there could be discrepancies in the later years. (1/26/00 10:00 TR 17-18)

Staff agrees with witness Foley that the assumptions used are not accurate and do not reflect the real demand. Witness Foley also claims that the way in which the alternatives were eliminated at the Initial Planning Meetings may not be accurate. (1/26/00 10:00 TR 18)

3) NANPA witness Tom Foley further indicates that number conservation measures would have an impact on the life of the NANP but specifically as to what and how long, he was not able to say. (EXH 6)

4) During the service hearing in Key West, NANPA witness Tom Foley distributed a special report which stated that the reserved area code for the relief of this region is 645, provided that there are no code conflicts. (EXH 1) During the service hearing no one objected to the use of this area code. Staff believes that the 645 area code is an easy number to remember because 645 NPA corresponds to "OIL" on a touch tone telephone.

5) Customer witnesses Mary K. Reich and Virginia A. Panico, residents of the Keys region, state that they want to keep the 305 area code and 7-digit local dialing (3/14/00 TR 17, 32) Staff notes that such an alternative may not be feasible or available.

Witness Panico states that the primary economic interest in the Keys region is tourism, which witness Panico describes as very fragile. (3/14/00 TR 33) Witness Panico states that the most important thing for them is to keep the 305 for tourism purposes. (3/14/00 TR 33) Staff agrees.

6) Customer witness Virginia A. Panico states that it was the Keys' idea to retain the 786 (SUN) area code instead of the 305 area code. (3/14/00 TR 31) Staff notes that due to imbalances in area code lives, the Commission designated this area code as an overlay for the Miami-Dade region by Order No. PSC-PSC-98-0812-FOF-TL, issued June 19, 1998. (EXH 1) Staff also notes that with staff's Alternative #12, the Keys' residents would be able to use the 786 NXXs, as well.

7) In FCC 96-333, CC Docket No. 92-237, ¶280, released August 8, 1996, the FCC determined that certain regions have their unique characteristics in which splitting area codes would cause more damage and confusion than the overlays. (EXH 1) Staff agrees.

8) BellSouth witness Stan L. Greer testifies that the Keys' main source of revenue is derived from the tourist industry. He believes that changing the area code could affect this industry. Witness Greer further states that the impact to business customers is considerable, as compared to residential customers, if a geographic split or area code change is required. (TR 185) Staff agrees.

9) During the Key West service hearing, Customer witness Mary K. Reich proposed that the Keys should be able to call each other on a local basis. (3/14/00 TR 18) Witness Reich submitted a petition with over 300 signatures to the Commission. (3/14/00 TR 19) Staff notes that this proposal, rate center consolidation, relates to Issue 2. Therefore, staff will address rate center consolidation in the body of the staff analysis in Issue 2.

Conclusion

Staff acknowledges that the Miami-Dade region of the 305/786 area code will, for all practical purposes, not be affected by the implementation of Alternative #12. For these residents, there will not be any change whatsoever in their present dialing patterns. While staff recognizes that a dialing pattern change will be necessary for the Keys region as discussed in Issue 3, staff believes that the permissive dialing period, discussed in Issue 4, will be sufficient for the subscribers to adapt.

Furthermore, given the economic status of the Keys region and their dependence on tourism, staff firmly believes that the benefit of permanently retaining the existing 305 telephone numbers outweighs the inconvenience of a change in the dialing pattern.

In conclusion, staff recommends that the Commission approve Alternative #12 as shown:

Region A

305, 786 and New NPA

15.6 years

Alternative #12
Expanded Overlay with
Number Conservation Measures

B. Analysis of the 561 Area Code

Before the service hearings took place, there were five alternatives. During the industry planning meeting, a sixth alterative was proposed to implement a state-wide wireless only overlay. This alternative was eliminated because a service specific overlay violates FCC Rules. (TR 29) Based on public testimony, customers would prefer to retain the 561 area code but would accept a split plan instead of an overlay plan which requires 10-digit local dialing. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff witness Lennie Fulwood introduced seven additional alternatives. (EXH 7)

Discussion of Alternatives for the 561 Area Code[9]:

Alternative #1 is an overlay relief plan for the entire area, in which 10-digit local dialing would be required for all local calls (Region A). No telephone number or area code changes would be required for current subscribers, and the approximate exhaust for this relief plan is 8.8 years. (EXH 7)

This alternative was proposed by the industry members to the Commission as their recommended alternative. NANPA witness Tom Foley states that this plan is projected to last 8.8 to 17.6 years. He explains the spread in years with an unknown means of NXX code reservation. (TR 29) During the service hearings, customers stated that they would want to retain the 561 area code, but also stated that they would not want to change the area code if a split would occur. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20) In addition, this alternative does not use number conservation mechanisms. Therefore, staff does not recommend this alternative.

Alternative #2 is a geographic split relief plan, with the Stuart, Hobe Sound, Jupiter, and West Palm Beach exchanges split to form Region B. Region A covers the remaining exchanges. The approximate exhaust for Region A is 8.1 years, and 9.5 years for Region B. (EXH 7)

MCI WorldCom witness Suzanne Brooks states that MCI WorldCom supports this alternative provided that Region A retains the 561 area code. (TR 157) Witness Brooks further states that implementing

[9]For accuracy of reading the Regions A, B, and C, staff recommends that the Commission refer to Attachment 3 for the 561 area code alternatives.

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geographic splits is the most appropriate, competitively neutral method of relief for the 561 area code. (TR 168)

According to the 1999 Commission Comparative Cost Statistics, there is local calling between West Palm Beach and Boynton Beach. (EXH 1) Thus, the local calling between the two exchanges would be interNPA, requiring 10-digit dialing. (EXH 8) During the service hearings, customers indicated that they would prefer not to change their area code. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Alternative #3 is a geographic split relief plan, with the Boynton Beach, Delray Beach, and West Palm Beach exchanges split to form Region B. Region A covers the remaining exchanges. The approximate exhaust is 9.5 years for Region A, and 8.1 years for Region B. (EXH 7)

Due to similar divisions of community of interest (i.e., as expressed through calling scope) as in Alternative #2, staff does not recommend this alternative.

Alternative #4 is a geographic split relief plan, with the Jupiter, Pahokee, Belle Glade, Boynton Beach, Delray Beach, Boca Raton, and West Palm Beach exchanges split to form Region B. Region A covers the remaining exchanges. The approximate exhaust is 24.6 years for Region A, and 3.1 years for Region B. (EXH 7)

As witnesses stated during the service hearings, Indian River, St. Lucie, and Martin Counties are growing rapidly. (3/23/00 2:00 TR 39) Therefore, staff believes that in a high growth area, the numbering resources would be used at a faster rate. Staff notes that witness Foley testified that the projections of area code exhaust may not be accurate. (1/26/00 10:00 TR 17-18) Staff notes that in the 941 and 407 area code relief dockets, the Commission approved relief plans which have about the same life expectancy (i.e., 3.1 years) as Alternative #4. (EXH 1; 3/23/00 10:00 TR 22-23) Due to this reason, staff believes that this is a possible alternative.

Customer witness Patrick Miller also prefers Alternative #4 provided that the 561 area code is retained in West Palm Beach County. (3/23/00 10:00 TR 24, 28) Similarly, Customer witness Gwynne Gonzales, representative of State ~~Representative~~ Senator Ron Klein, prefers Alternative #4 provided that the 561 area code is retained in Palm Beach County (Region A). However, staff does not

recommend this alternative since it provides limited relief for the most congested region. This plan would require new relief within 3.1 years in the West Palm Beach region. (EXH 7) In addition, the two regions should have life spans of at least five years per the INC Guidelines. (EXH 1)

Alternative #5 combines the split and overlay relief methods, with a similar split as found in Alternative 4, but with a concentrated growth overlay deployed in Region B. The approximate exhaust is 10 years for Region A, and 2.0 years for Region B. (EXH 7)

Due to similar reasons in Alternative #4, staff does not recommend this alternative.

Alternative #6 is a geographic split and overlay plan which uses two new NPAs. The Boca Raton, Delray Beach, Boynton Beach, and West Palm Beach exchanges are split to form Region B. Region A covers the remaining exchanges. An area code change would be necessary for current subscribers in Region A which would be assigned the first new NPA. Region B utilizes a second new NPA. The approximate exhaust is 18.1 years for Region A, and 17.3 years for Region B. (EXH 7)

This alternative uses two new NPAs with life spans exceeding the 15-year limit, as indicated by the INC Guidelines. (EXH 1) Staff believes that using two new area codes is an inefficient way of providing numbering resources to the 561 area code while relief could be achieved by using one area code only. Thus, staff does not recommend this alternative.

Alternative #7 is a geographic split relief plan, with the West Palm Beach exchange split to form Region B. Region A covers the remaining exchanges. The approximate exhaust is 5.3 years for Region A, and 14.7 years for Region B. An area code change would be necessary for the region which gets the new NPA. (EXH 7)

According to the 1999 Commission Comparative Cost Statistics, there is local calling between West Palm Beach and Boynton Beach. (EXH 1) Thus, the local calling between the two exchanges would be interNPA, requiring 10-digit dialing. (EXH 8) During the service hearings, customers indicated that they would prefer not to change their area code. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Alternative #8 is a combination of split and overlay relief plans in which the West Palm Beach exchange forms Region B. This region retains the 561 area code and a new NPA. The remaining exchanges

form Region A with a second new NPA. The approximate exhaust is 19.3 years for Region A, and 14.7 years for Region B. (EXH 7)

Staff notes that the INC guidelines require that a new area code must have a projected life of at least 5 years, and at the most 15 years. The projected life for Region A exceeds 15. In addition, according to the 1999 Commission Comparative Cost Statistics, there is local calling between West Palm Beach and Boynton Beach. (EXH 1) Thus, the local calling between the two exchanges would be interNPA, requiring 10-digit dialing. (EXH 8) During the service hearings, customers indicated that they would prefer not to change their area code. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Alternative #9 is a geographic split relief plan, with the Port St. Lucie, Jensen Beach, Stuart, Hobe Sound, Jupiter, and West Palm Beach exchanges split to form Region B. Region A covers the remaining exchanges. The approximate exhaust is 10.5 years for Region A, and 7.3 years for Region B. (EXH 7)

According to the 1999 Commission Comparative Cost Statistics, there is local calling between West Palm Beach and Boynton Beach. (EXH 1) Thus, the local calling between the two exchanges would be interNPA, requiring 10-digit dialing. (EXH 8) During the service hearings, customers indicated that they would prefer not to change their area code. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Alternative #10 is a combination of split and overlay relief plans in which all of exchanges would retain the 561 area code. All of the exchanges except the Boynton Beach, Jupiter, and West Palm Beach exchanges (Region B) would be overlaid with a new area code (Region A). The approximate exhaust is 26.2 years for Region A, and 7.6 years for Region B. (EXH 7)

According to the 1999 Commission Comparative Cost Statistics, there is local calling between Delray Beach and Boynton Beach. (EXH 1) Thus, the local calling between the two exchanges would be interNPA, requiring 10-digit dialing. (EXH 8) During the service hearings, customers indicated that they would prefer not to change their area code. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Alternative #11 is similar to Alternative #1, but employs number conservation measures, as discussed in Issue 2. The approximate exhaust for this relief plan is 20 years. (EXH 7) As staff noted in

the case background, the INC Guidelines do not take into account the effect of number conservation measures. Thus, staff notes that the assumptions in determining the projected exhaust of this plan may vary anywhere from 10 to 20 years since there are no proven techniques to estimate the exhaust of an area code when number conservation measures are implemented. Thus, even though the INC Guidelines provide that a plan should not have a life longer than 15 years, number conservation measures are allowed to further extend the life of the plan beyond 15 years. According to NANPA witness Foley and staff witness Fulwood, the projected lives of area codes double if number conservation measures are used. (EXH 6; EXH 7)

The only difference is to implement various number conservation measures to lengthen the life of the area code. This alternative meets the need of the customers in that everyone would retain their current area code. However, certain dialing changes would be necessary. Staff notes that the industry recommended a distributed overlay for the 561 area code. (EXH 6; EXH 1) Staff also notes that with this alternative, the community of interest (i.e., as expressed through calling scope) would not be divided by this relief plan. (EXH 1)

Alternative #12 is a split relief plan similar to Alternative #9, that employs number conservation measures. The approximate exhaust is 21 years for Region A, and 14.8 years for Region B.

Although this alternative uses number conservation measures, the introduction of a new area code would divide the community of interest (i.e., as expressed through calling scope) as in Alternatives #2 and #3. (3/23/00 2:00 TR 37; 3/23/00 10:00 TR 20; 3/24/00 TR 19, 22-23) Therefore, staff does not recommend this alternative.

Analysis:

1) Table 1-3 summarizes each of the preceding alternative relief plans. All calculations of years to exhaust for the regions are based on the assumption that the current demand for central office codes will continue at approximately the same rate. (EXH 1; TR 192)

			Regions (years)	
Alternatives	**Type**	**Number of NPAs Needed**	**A**	**B**
1	O	1	8.8	
2	S	1	8.1	9.5
3	S	1	9.5	8.1
4	S	1	24.6	3.1
5	SCGO	1	10	2
6	SO	2	18.1	17.3
7	S	1	5.3	14.7
8	SO	2	19.3	14.7
9	S	1	10.5	7.3
10	SO	1	26.2	7.6
11	O#	1	20	
12	S#	1	21	14.6

Table 1-3: The projected years to exhaust for all 561 area code relief plans

In this table, O is an overlay relief plan, S is a geographic split plan, SCGO is a split and concentrated growth overlay relief plan, SO is a geographic split with overlay, O# is an overlay with number conservation measures, and S# is a geographic split with number conservation measures.

2) The residents of the 561 area code expressed their preference to keep their present 7-digit local dialing pattern and also keep the 561 area code. (3/23/00 10:00 TR 19, 23-24; 3/23/00 2:00 TR 37) Almost all of the witnesses during the service hearings preferred

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Alternative #4. (3/23/00 10:00 TR 19, 23-24; 3/23/00 2:00 TR 37) Customer witness Gidion states that if another area code change occurs, this will be her fourth new area code since she started living in Florida. (3/23/00 2:00 TR 37)

3) Customer witness Walsh, president of the St. Lucie County Chamber of Commerce, offers a contrasting view and testifies:

> . . . our goal as a Chamber of Commerce and the business organization in St. Lucie County is to attract new businesses to our area, to retain the businesses that we have, to assist our businesses, and to protect and improve the quality of life for our residents. Anything that makes doing business in St. Lucie County easier, certainly is what we would support. Ten-digit dialing is not something we would like to see happen in our area. The creation of a new area code is something that the Chamber of Commerce would support. (3/23/00 10:00 TR 20-21)

Customer witness Gonzales, in expressing the preferences of State ~~Representative~~ Senator Ron Klein, states that he " . . . would like to see Palm Beach County keep its 561 area code and not go to 10-digit dialing." (3/23/00 TR 23)

4) During the service hearings, Customer witness Sid Poe stated that Alternative #4 would cause customer confusion. Witness Poe explains that the community of interest for Martin County is towards the south, due to shopping areas located around Jupiter. (3/23/00 2:00 TR 43) Witness Poe states that the Jupiter exchange area is the region where most people conduct business and do their shopping. The witness further clarifies that dividing Martin County with a split plan would cause a lot of confusion. (3/23/00 2:00 TR 43) Staff agrees.

5) BellSouth witness Greer asserts that multiple local dialing patterns could be confusing to customers, offering support to a distributed overlay relief. (TR 182) In addition, witness Greer affirms that a distributed overlay would have a lesser impact on business customers as well. (TR 182) Staff agrees.

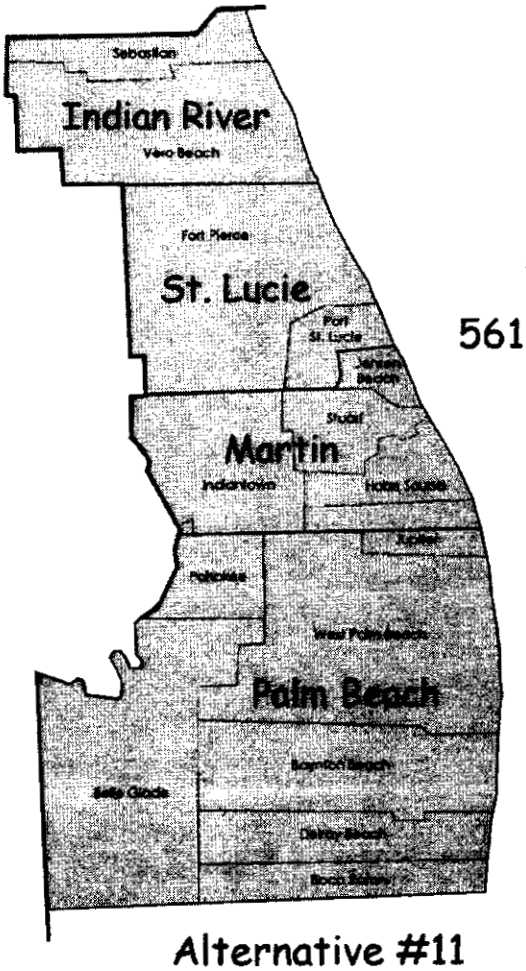
Conclusion

Staff believes that even with a split plan alternative, 10-digit dialing will be necessary on numerous local calling routes as

discussed in Issue 3. BellSouth witness Stan Greer provided a summary of dialing patterns for each alternative. (EXH 15) Based on this summary, staff believes that a change in local dialing may not be avoidable if a split plan is desired.

Staff notes that the 561 area code selection process has been quite complicated. Staff believes that the customer testimony in this proceeding strongly supports a geographic split plan, Alternative #4. However, public testimony also indicates that customers would prefer to retain the 561 area code. Staff believes that implementation of an overlay relief plan would be the least disruptive, since existing customers would be able to retain the 561 area code and the community of interest would not be divided. In addition, 1,000-block number pooling will be implemented effective January 22, 2001, for this region. With this implementation, numbers would be used efficiently and effectively.

Based on the discussion provided in the body of staff analysis, staff recommends that the Commission approve Alternative #11 as shown below:



Region A
561 and New NPA
20 years

Alternative #11
Overlay with
Number Conservation Measures

C. Analysis of the 954 Area Code

Before the service hearings took place, there were two alternatives. The majority of the public testimony indicated that customers would prefer to retain the 954 area code and 7-digit local dialing because the 954 area code was adopted on August 1, 1996. (EXH 1) As a result, staff witness Lennie Fulwood introduced two additional alternatives, for a total of four. (EXH 7)

Discussion of Alternatives for the 954 Area Code[10]:

Alternative #1 is a distributed (all services) overlay relief plan. A new area code would be implemented on top of the existing area code. All local calls would be dialed on a 10-digit basis. The approximate life expectancy of this plan is 9.5 years. (EXH 7)

Due to the small geographic size of the 954 area code, staff believes and agrees with BellSouth witness Stan Greer that the dialing patterns would be problematic if a geographic split plan is implemented. (TR 180)

The industry recommended this alternative to the Commission as their best alternative. Staff agrees, because the only way to provide additional numbering resources without confusion in this area code is to implement an overlay relief plan. Testimony during the service hearing indicated that residents would want to retain their 954 area code since they recently got this area code. (EXH 1; 1/19/00 TR 14) Therefore, staff finds this alternative reasonable.

Alternative #2 is a geographic split plan in which Region A consists of the Deerfield Beach, Coral Springs, and Pompano Beach exchanges and a portion of the Ft. Lauderdale exchange. Region B consists of the Hollywood exchange and the remaining portion of the Ft. Lauderdale exchange. The approximate life expectancy is 9.9 years for Region A and 9.2 years for Region B. All local calls within each region are 7 digits. (EXH 7)

This split plan divides the community of interest between Pompano Beach and Ft. Lauderdale. (EXH 1) In addition, pursuant to recent INC Guidelines (INC 97-404-016, issued November 8, 1999), division of rate centers is not allowed. (1/19/00 TR 29; EXH 1) NANPA witness Tom Foley stated that the split plan would divide a

[10]For accuracy of reading the Regions A and B, staff recommends that the Commission refer to Attachment 4 for the 954 area code alternatives.

rate center and would, therefore, create customer confusion in dialing patterns. (1/19/00 TR 29, 30) Staff agrees, and therefore does not recommend this alternative.

Alternative #3 is a combination of split and overlay relief plans in which the Pompano Beach, Coral Springs, and Deerfield Beach exchanges would retain the 954 area code and some portion of the new NPA's NXXs (Region A). The Ft. Lauderdale and Hollywood exchanges would receive the remaining NXXs of the new area code (Region B). The approximate life expectancy is 14.6 years for Region A and 7.3 years for Region B. (EXH 7)

Staff does not recommend this alternative because it divides the 954 area code in such a way that almost all local calls would become InterNPA (i.e., 10-digit dialing), and would cause customer confusion. (EXH 8)

Alternative #4 is a geographic split plan. Region B includes the Ft. Lauderdale exchange. The remainder of the exchanges are located in Region A. The approximate life expectancy is 15.3 years for Region A and 5.9 years for Region B. (EXH 7)

Staff does not recommend this alternative because it clearly divides the community of interest (i.e., as expressed through calling scope), and would cause customer confusion because most local calls would become InterNPA (i.e., 10-digit dialing) (1/19/00 TR 29, 30; EXH 8)

Analysis:

1) Table 1-4 summarizes each of the preceding alternative relief plans. All calculations of years to exhaust for the regions are based on the assumption that the current demand for central office codes will continue at approximately the same rate. (EXH 1; TR 192)

			Regions (years)	
Alternatives	**Type**	**Number of NPAs Needed**	**A**	**B**
1	O	1	9.5	
2	S	1	9.9	9.2
3	SO	1	14.6	7.3
4	S	1	15.3	5.9

Table 1-4: The projected years to exhaust for all 954 area code relief plans

In this table, O is a distributed overlay, S is a geographic split, and SO is a geographic split with an overlay.

2) BellSouth witness Greer argues that implementation of any geographic split relief plan in the 954 NPA would divide a major local calling scope within the county, stating that with a geographic split relief plan,

> . . . BellSouth will have no option but to implement a dialing delay of 4-6 seconds for most, if not all, switches in the 954 area. This delay would allow for the customer to complete their dialing before the switch began to route the call. (TR 181)

3) Customer witness Margaret Bates, a commissioner with the City of Lauderhill, presented a resolution from the City of Lauderhill at the Service Hearing. In this resolution, the City of Lauderhill expressed its preference for a geographic split relief plan in lieu of 10-digit local dialing. (1/19/00 TR 14) BellSouth witness Stan Greer's summary about dialing patterns for geographic split plans for the 954 area code indicates BellSouth's belief that 10-digit local dialing is unavoidable. (EXH 15)

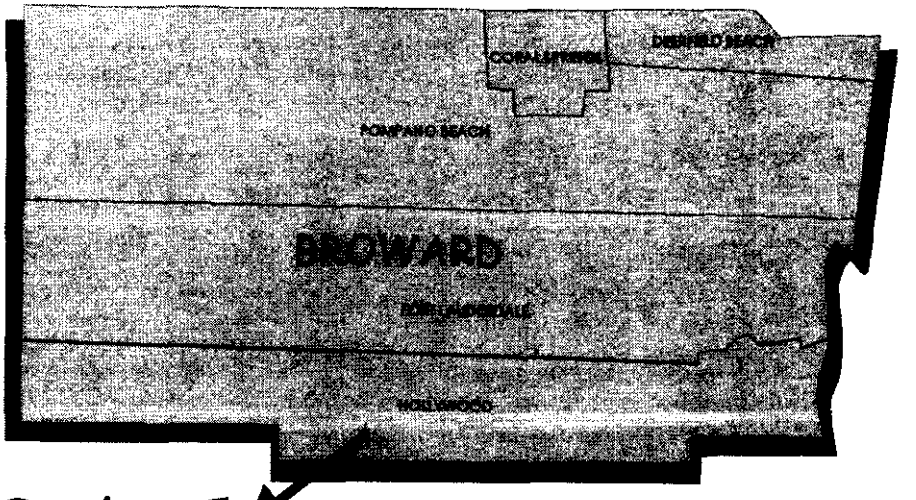
Conclusion

Based on the above discussion, staff believes that the best relief alternative for the 954 area code is to implement an overlay relief plan. Therefore, staff recommends that the Commission approve the industry's consensus plan (Alternative #1) as shown:

954 and New NPA

Alternative #1

Distributed Overlay*



Region A

9.5 Years

* Recommended by the Industry

D. Analysis of the 904 Area Code

Before the service hearings took place, there were five alternatives. Staff sent out a data request to county officials in the summer of 1999 to solicit input. Based on the response, staff witness Lennie Fulwood introduced a few more alternatives. (EXH 7) During the service hearings, various alternatives were discussed and analyzed. Since there was considerable testimony regarding the importance of keeping Flagler and Volusia Counties together, staff analyzed the technical feasibility of this and other approaches, and prepared additional alternatives in an attempt to determine the best option to meet the needs of customers in the 904 area code. Based on the input received from county officials and customers, staff witness Fulwood introduced 12 additional alternatives, for a total of 17. (EXH 7)

Discussion of Alternatives for the 904 Area Code[11]:

Alternative #1 is a distributed, all services overlay relief plan recommended by the industry to the Commission. In this plan, all local calls are dialed on a 10-digit basis. The approximate life expectancy is 10.1 years (Region A). (EXH 7)

Although this alternative was the industry's proposed alternative to the Commission, the customers in the 904 area code strongly objected to this plan. (EXH 2; 2/28/00 TR 27, 40, 43, 45) Most customers preferred a geographic split plan, which would allow them either to retain the 904 area code or receive a new area code, consistent with the community of interest. (EXH 2; 2/28/00 TR 27, 40, 43, 45) Thus, staff does not recommend this alternative.

Alternative #2 is a concentrated growth overlay relief plan in which the exchanges predominantly located within Nassau, Duval, and St. Johns counties would receive an additional area code as an overlay (Region A), and the remaining exchanges throughout the geographic area would also utilize prefixes of a new NPA for relief (Region B). Any unassigned 904 NXXs would be used only to extend the life of Region A. Customers in the concentrated overlay region would retain their current telephone numbers; however, they would be required to dial local calls on a ten-digit basis. Customers in Region B would have seven-digit local dialing. This plan is estimated to provide 11.4 years of relief in the overlay region, but only 4.1 years of relief in the other region. (EXH 7)

[11]For accuracy of reading the Regions A, B, and C, staff recommends that the Commission refer to Attachment 5 for the 904 area code alternatives.

Consequently, the overlay would need to be extended in 4.1 years, creating the same result as in Alternative #1.

In addition, the community of interest (i.e., as expressed through calling scope) would be divided. With this alternative, staff believes that there would be considerable customer confusion about dialing patterns for local calls. (EXH 8) Therefore, staff does not recommend this alternative.

Alternative #3 is a geographic split. The split boundary runs along rate center boundaries in Nassau, Duval, and St. Johns Counties. The area north and east of the boundary is shown as Region A on the map. The remaining area is Region B. The life for Region A would be 7 years, and the life for Region B would be about 14.3 years. (EXH 7)

This alternative would divide the community of interest (i.e., as expressed through calling scope) between Clay and Duval counties. (EXH 1) Based upon the letters from the customers and county officials entered in the record, and statements made during the service hearings, staff believes that a community of interest (i.e., as expressed through calling scope) should not be divided. (EXH 1; EXH 2; EXH 8) Therefore, staff does not recommend this alternative.

Alternative #4 is a geographic split plan. This plan groups rate centers predominantly located in Nassau, Duval, Baker, Bradford, Union, Alachua, Columbia, Gilchrist, Lafayette, Suwannee, and Hamilton Counties in one geographic region, Region A. These 11 counties would have a life of approximately 6 years. Region B, which comprises the remaining counties, would have a life of about 17.3 years. (EXH 7)

Due to community of interest reasons between St. Johns and Duval Counties (i.e., as expressed through calling scope), staff does not recommend this alternative. (EXH 1)

Alternative #5 is called the Nassau/Duval Counties relief plan. This is a geographic split plan which groups the exchanges predominantly located in Nassau and Duval Counties in one geographic region (Region A), while the remaining counties make up a second area (Region B). The projected lives are 9.5 for Region A, and 10.7 years for Region B. (EXH 7) This alternative allows seven-digit local dialing within each of the regions, and ten-digit local dialing across the boundary.

ALLTEL states that in the event the Commission does not

approve Alternative #1, ALLTEL would prefer Alternative #5 because this plan would have the least impact on its customers. (ALLTEL BR pp. 7-8) ALLTEL further states that this plan would keep Callahan and Hilliard exchanges, located in Nassau County, with 7-digit local or ECS calling between each other and to Jacksonville. (ALLTEL BR p. 8)

Although staff believes that this alternative is reasonable, there were several objections both from the industry and the public since this alternative divides the community of interest between Baker and Duval Counties, and Clay and Duval Counties. (Northeast BR p. 7; EXH 2) Therefore, staff does not recommend this alternative.

Alternative #6 is a geographic split which groups rate centers predominantly located in Nassau, Duval, Clay, and St. Johns Counties as Region A. Region B groups rate centers in the remaining counties. Region B would have a life of 17 years, and Region A would have a life of 5.8 years. (EXH 7) It is staff's opinion that this alternative proposes a discontinuous area code distribution, which some people may find confusing.

BellSouth witness Stan L. Greer states that if the Commission were to implement a split plan, his company would recommend that the Commission choose Alternative #6. (TR 185) Based on the testimony at the service hearings, witness Greer asserts that this relief plan would group regions that have a strong community of interest. (TR 185)

Although this alternative is reasonable, there were several objections both from the industry and the public since this alternative divides the community of interest between the Baker and Duval Counties. (TR 136; Northeast BR p. 7; EXH 2) However, several county officials and residents of Volusia and Flagler Counties recommend this plan, as long as, all of Volusia County is included in this plan. (EXH 2; Volusia BR p. 5) In fact, Northeast witness Deborah L. Nobles states that in the event the Commission does not approve Alternative #1, her company would prefer Alternative #6, provided that Baker County is included within Region A. (Northeast BR p. 7)

In addition, Sprint witness Sandra Khazraee pointed out several problems associated with this alternative; however, the witness indicated that if this alternative were modified to include the Starke, Lawtey, and Kingsley Lake exchanges from Bradford County in Region A, Sprint would support this alternative. (TR 223) Staff agrees, and asserts that the Commission should choose an

alternative that would have the least impact on the industry and customers. Based on the testimony presented, a modified version of Alternative #6 may better accommodate some of the concerns raised.

Witness Nobles indicates that because of the significant amount of local calling from Northeast's exchanges in Baker County to Jacksonville, Northeast believes that a modified version of Alternative #6 would be the next best area code relief solution for its customers. (TR 136, 137) Witness Nobles further explains that a modified version of Alternative #6 would allow Northeast's customers to retain 7-digit local dialing from Northeast's exchanges to 148 NXXs in Jacksonville. (TR 137) In addition, witness Nobles states that Northeast has only three NXXs in Baker County, and these NXXs have a slow growth rate. (TR 138) Staff agrees with witness Nobles that adding three NXXs to the Jacksonville region would not materially decrease the life of Region A.

During NANPA witness Tom Foley's depositions, there was a discussion about what would happen to the lives of the area codes if Baker County were included in Region A. Witness Foley indicated that including Baker County exchanges would affect the exhaust date by months rather than years. (EXH 6) Staff agrees with the witness because three NXXs would not affect the projected life of an area code by years. (EXH 1; EXH 6; EXH 7) Furthermore, because in the 904 area code, number conservation measures are employed, the life expectancy may exceed the 15 year limit established by the INC Guidelines.

Staff has addressed all the concerns identified in the record and has included Baker County's exchanges and Bradford County's Starke, Lawtey, and Kingsley Lake exchanges in Region A. With the proposed modifications, staff calculated the approximate lives of Region A and Region B of the Modified Version of Alternative #6 based on the assumptions and calculation mentioned in staff witness Fulwood's and witness Foley's testimonies. (EXH 6; EXH 7) Under this scenario, Region A would have an approximate life expectancy of 5.2 years, and Region B would last 19.1 years. Staff notes that 13.9 years difference between 19.1 and 5.2 years is acceptable based upon INC Guidelines. (EXH 1; EXH 6)

Based on the record, staff considers this alternative, in its modified version, to be a reasonable relief plan.

Alternative #7 is a geographic split relief plan along the coastline (Region A). Region A has an approximate life expectancy of 2.3 years. The remaining area (Region B) would have a life

expectancy of 36.2 years. (EXH 7)

ALLTEL states that the Commission should not approve this alternative because this geographic split plan would result in Clay and Putnam Counties having two area codes. (ALLTEL BR p. 4) ALLTEL witness Harriet E. Eudy further states that this would also divide numerous local calling areas and would result in NPAs with unbalanced lives. (TR 122) Staff agrees, and notes that Section 5.0(h) of NPA Code Relief Planning and Notification Guidelines provides that the newly created geographic regions should have projected lives of approximately the same number of years. (EXH 1)

Staff notes that this alternative divides many of the local calling areas within and among the regions. In addition, NANPA strives to follow the Industry Numbering Committee's guidelines. Ideally, all of the area codes in a given region should exhaust at about the same time in the case of geographic splits. (EXH 1; EXH 6) According to these guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. (EXH 1) Thus, staff does not recommend this alternative.

Alternative #8 is a combination of an overlay and geographic split relief plans utilizing two new area codes. Portions of Flagler and Volusia Counties (Region B) would receive a new area code, having a life expectancy of 39 years. The remaining counties (Region A) would utilize 904 and a second NPA and require relief in approximately 15.4 years. (EXH 7)

This alternative was not favored by the residents of Volusia and Flagler Counties since their community of interest would be divided. The residents preferred a split plan which would unite all of Volusia and Flagler Counties. (EXH 2; Deltona BR p. 6; Volusia BR p. 5) Because this plan uses two NPAs and also has the same reasons mentioned in Alternative #7, staff does not recommend this alternative.

Alternative #9 is a combination of a spotted overlay and geographic split relief plans, in which an overlay occurs in various regions. The shaded regions shown on the map utilize 904 and one additional NPA (Region A). The unshaded area (Region B) utilizes a second new NPA. The approximate life expectancy is 15.5 years for Region A and 36.3 years for Region B. (EXH 7)

This alternative divides the coastal residents from the inland customers. (EXH 1) Staff believes that different dialing patterns

would be extremely confusing. (EXH 1; EXH 6; EXH 8) Therefore, staff does not recommend this alternative.

Alternative #10 is a geographic split boundary extension overlay plan that groups the exchanges predominantly located in Nassau, Duval, and St. Johns Counties to form an area (Region A). This region would utilize two area codes and have an approximate life of 10.1 years. The remaining exchanges are located in Region B. This region would have an approximate life expectancy of 10.2 years. (EXH 7)

Although this alternative split plan has nearly equal life spans for both regions, the community of interest (i.e., as expressed through calling scope) between Clay and Duval Counties would be divided. (EXH 1) Therefore, staff does not recommend this alternative.

Alternative #11 is an overlay and geographic split relief plan which utilizes two new NPAs. The coastline customers (Region A) utilize the 904 NPA and one additional NPA as an overlay relief plan. Region A will have an approximate life of 15.5 years. The remaining area, Region B, utilizes a second new area code with an approximate life of 36.2 years. (EXH 7)

Staff notes, however, that using two or more new NPAs is not an efficient way to provide relief for this region, pursuant to INC Guidelines. (EXH 1) Thus, due to similar reasons in Alternatives #8 and #9 (disruption of community of interest and use of two NPAs), staff does not recommend this alternative.

Alternative #12 is a geographic split boundary extension overlay plan in which the coastline counties (Region A) would utilize two area codes (904 NPA and one new NPA) as overlay area codes, and the remaining customers in Region B would share the prefixes of the new code used in Region A. The approximate lives are 10.0 and 10.6 years, respectively. (EXH 7)

This alternative is similar to Alternative #7. Since this option disrupts the community of interest, staff does not recommend this alternative.

Alternative #13 is similar to alternative #12 except that it includes all of Volusia County. This plan includes the Debary exchange and a part of the Sanford exchange which are currently part of the 407/321 area code. The approximate life of the plan is 10 years for the coastline (Region A), and 10.3 years for the interior (Region B).

Staff does not recommend this alternative because this plan disrupts the community of interest as in Alternatives #7 and #12.

Alternative #14 is a three-way split proposal in which the exchanges predominantly located in Nassau and Duval Counties would utilize one area code (Region A) with an approximate life of 9.5 years. The exchanges predominantly located in Flagler and Volusia Counties (Region C) would exhaust in approximately 39 years, while Region B (the remaining exchanges) would exhaust in approximately 25.4 years. (EXH 7) This alternative excludes the Debary exchange and a portion of the Sanford exchange. Staff refers to this area as the proposed Sanford exception area.

ALLTEL states that the Commission should not approve this alternative because this plan requires the use of two new area codes. (ALLTEL BR p. 6) ALLTEL witness Harriet E. Eudy further states that this plan would also divide numerous local calling areas and would result in NPAs with unbalanced lives. (TR 126) Staff again notes that Section 5.0(h) of NPA Code Relief Planning and Notification Guidelines provides that the newly created geographic regions should have projected lives of approximately the same number of years. (EXH 1)

Similar to Alternatives #7, #8 and #9, all of the area codes in a given region should exhaust about the same time in the case of geographic splits. According to the INC guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. Thus, staff does not recommend this alternative.

Alternative #15 is identical to Alternative #14; however, this alternative includes the Debary exchange and the proposed Sanford exception area. Regions A, B, and C are expected to exhaust in 9.5, 25.4, and 36.9 years, respectively. (EXH 7)

Similar to Alternatives #7, #8, #9, and #14, all of the area codes in a given region should exhaust about the same time in the case of geographic splits. According to the INC guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. Therefore, staff does not recommend this alternative.

Alternative #16 is a staggered geographic split plan, which uses two implementation phases. In the first implementation phase, Flagler and Volusia Counties are assigned a new area code with an approximate life of 36.9 years (Region B). The remaining counties,

Region A, would retain the 904 area code with an approximate life of 2.7 years. (EXH 7)

In the second implementation phase, Flagler and Volusia Counties would share their area code with the exchanges predominantly located in Putnam, Hamilton, Suwannee, Lafayette, Gilchrist, Alachua, Union, Bradford, Columbia, and Baker Counties (Region B). The approximate exhaust life of Region B is 14 years. The shaded area (Region A) could have two options. The first option is that they would retain the 904 area code with an approximate exhaust life of 3.1 years. The second option is that this region would be overlaid with a new area code that would have an approximate life of 22.4 years.

Staff notes that the time between two phases will be approximately 2.7 years. In other words, once the first phase is put in place, the second phase would need to be established due to industry guidelines. (EXH 1)

Conceptually, this alternative is very similar to Alternative #6. Residents and County officials from Volusia and Flagler Counties preferred this alternative as much as they did Alternative #6, provided that Alternative #6 included all of Volusia County. (1/28/00 TR 43; EXH 2) Therefore, staff considers this relief plan reasonable.

Alternative #17 is a geographic split plan in which the exchanges predominantly located in Nassau, Duval, St. Johns, and portions of Clay Counties are split to form Region A. The remaining exchanges are grouped to form Region B. The approximate life for Region A is 6.9 years, and 14.4 years for Region B. (EXH 7)

Since this plan disrupts the community of interest between Baker and Duval Counties, staff does not recommend this alternative. (TR 136; Northeast BR p. 7; EXH 2)

Analysis:

1) Table 1-5 summarizes each of the preceding alternative relief plans. All calculations of years to exhaust for the regions are based on the assumption that the current demand for central office codes will continue at approximately the same rate. (EXH 1; TR 192)

			Regions (years)		
Alternatives	**Type**	**Number of NPAs Needed**	**A**	**B**	**C**
1	O	1	10.1		
2	CGO	1	11.4	4.1	-
3	S	1	7	14.3	-
4	S	1	6	17.3	-
5	S	1	9.5	10.7	-
6 6 (Modified)	S S	1 1	5.8 5.2	17 19.1	- -
7	S	1	2.3	36.2	-
8	OS	1	15.4	39	-
9	SOS	1	15.5	36.3	-
10	SBEO	1	10.1	10.2	-
11	OS	1	15.5	36.2	-
12	SBEO	1	10	10.6	-
13	SBEO	1	10	10.3	-
14	3S	2	9.5	25.4	39
15	3S	2	9.5	25.4	36.9
16a 16b	SS SS/O	2 2 or 3	2.7 3.1 or 22.4	36.9 14	- -
17	S	1	6.9	14.4	-

Table 1-5: The projected years to exhaust for all 904 area code relief plans

In this table, O is an overlay relief plan, CGO is a concentrated growth overlay relief plan, S is a geographic split, OS is an overlay with a geographic split, SOS is a spotted overlay with a geographic split plan, SBEO is a geographic split boundary extension overlay relief plan, 3S is a three way split, SS is a

staggered geographic split, and SS/O is a staggered geographic split with or without an overlay.

2) Although the preferred industry NPA relief plan is an all services overlay plan, various parties have indicated their second best choice is a geographic split relief plan. (ALLTEL BR p. 7; BellSouth BR p. 7; Northeast BR p. 7) Testimony from the service hearings, along with other record evidence such as numerous letters and comments, however, has shown an overwhelming preference for a geographic split NPA relief plan, particularly one which will unite the citizens of Volusia County. (EXH 2; EXH 12)

3) NANPA witness Tom Foley states that Alternative #2, a concentrated growth overlay, was eliminated by the industry for several reasons. (TR 33) First, the unaffected portion of the 904 area code would have a short life span. Second, no administrative tools have been developed to monitor the exhaust of concentrated growth overlays. Third, local calling areas would be divided, resulting in customer confusion. Lastly, the projected life span could be dramatically reduced by NXX code requests from new market entrants.

Staff agrees with witness Foley's assessments. Therefore, staff believes that concentrated growth overlay plans should be avoided.

4) Volusia County witness Robert M. Weiss summarized the area code dilemma in his county. He states:

> Volusia County has been arbitrarily and inconveniently split for telephone calling purposes since the AT&T modified final judgement (MFJ) which established rules and calling areas subsequently to the breakup of the Bell system in the 1984 time frame. The local access and transport area (LATA) boundary dividing the Daytona Beach calling area of [sic] LATA from the Orlando LATA goes right through Southwest Volusia County without any respect for, or consideration of, political boundaries. Since the time of this division, Volusia County's southwest sector has increased in population dramatically. Particularly of note is the incorporation of the second largest city in the County, as well as one of the fastest growing areas of the state in Deltona. The present situation, therefore, has over one-third of the citizens of

> the County separated from the other two-thirds by a LATA boundary. (TR 45)

Customer witness Weiss further states that the City of Deltona is served by two LECs, three exchanges, and two area codes. Inclusion of a new area code would result in three area codes for the City of Deltona and four area codes for Volusia County. (TR 47) Witness Weiss also acknowledges the problems associated with assigning a single area code only to Flagler and Volusia Counties. He states:

> We understand that the county alone may not have enough subscribers to warrant our own exclusive NPA but may have to share with neighboring counties. That situation is acceptable, although our own exclusive NPA would be preferred. (TR 47)

Staff agrees with Customer witness Weiss's assessment because pursuant to industry guidelines, all of the area codes in a given region should exhaust about the same time in the case of geographic splits. According to these guidelines, severe imbalances, for example, a difference in area code lifetimes of more than 15 years, should be avoided. (EXH 1)

5) City of Deltona witness Wayne Gardner states that keeping Volusia and Flagler Counties together by uniting them under one area code is in the best interest of the tourism industry. (TR 40) Witness Gardner further states that "[P]resently Volusia County has an emerging echo [sic] tourism within the west Volusia area, and of course we have a beach tourism area, and racing tourism area in the Daytona Beach area." (TR 40) Witness Gardner asserts that five area codes within the same county would cause an adverse economic impact upon all of the residents because the tourism industry would suffer. (TR 40) Visitors would not know what area code to dial and use, and what dialing plan to use (i.e., 7-digit, 10-digit, or 1+ 10-digit). Witness Gardner further explains this problem as "[T]his decrease in tourism would have a 'trickle-down' effect upon any and all other industries within Volusia County." (TR 40)

6) The majority of the public witnesses indicated that they would prefer a split which would keep Flagler and Volusia Counties together and united with one area code regardless of what the new area code might be. (EXH 2) City of Deltona witness Wayne Gardner summarized the problems associated with the area codes in Volusia County. He stated that an additional area code for Volusia County would result in the county having four area codes because portions of Volusia County use the 407/321 overlay combination, and other portions are using the 904 area code. (TR 37) Witness Gardner

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further indicates that when the 407/321 area codes exhaust within three to four years, an additional area code would be required. Consequently, this would bring the fifth area code to the county. (TR 37) Staff notes that the Commission has received over 3,000 postcards from the customers in this area to keep Flagler and Volusia Counties together and united with once area code.

7) Sprint witness Sandra A. Khazraee states that implementing Alternative #6 would divide the Kingsley Lake and parts of the Starke exchanges into different NPAs. (TR 220-221) Witness Khazraee further states that splitting these communities in this manner would require these communities to use 10-digit dialing to reach nearby communities. (TR 220-221) Thus, witness Khazraee suggests that problems associated with a split could be avoided if the ". . . Commission avoids drawing any NPA line east of the westernmost Starke, Kingsley, and Lawtey boundaries within the Sprint service territory." (TR 221-223) Staff agrees because as witness Khazraee points out in her testimony, the Commission has not heard any evidence in this proceeding which would demonstrate that locating an NPA boundary strictly along the county line would outweigh the cost and inconvenience imposed on customers and companies. (TR 221-223) However, witness Khazraee conceded that by implementing the industry consensus overlay relief plan, ". . . all of these calls would also have to be dialed with ten digits . . ." (TR 221-223)

8) BellSouth witness Stan Greer acknowledges that the Debary exchange and the Osteen area in or near Volusia County provide certain challenges, depending on how the 904 NPA relief is provided. (TR 186) Witness Greer testifies that BellSouth would agree to move the Debary exchange to a Volusia County area code, provided that is what the customers desire. (TR 186) Witness Greer states that there is a possibility of code conflicts with the current NXXs assigned in the Debary exchange. (TR 186) Witness Greer asserts that, "[I]f that is the case, then the customers in Debary would need to make a full 10-digit number change." (TR 186) Staff ~~agrees~~ **disagrees, because only the area code portion of Debary customers' telephone numbers would change.** With respect to the Osteen area, witness Greer testifies that in a previous proceeding, a balloting program was initiated to address their situation and

> . . . Sprint and BellSouth did everything possible, including an offer to implement EAS between Osteen and Orange City, to assist the county in their efforts. However, given all

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of the efforts of Volusia County, Sprint and BellSouth, the ballot failed. (TR 186-187)

Staff notes that the ballot failed due to lack of response from the subscribers. (EXH 1) Staff believes, however, the ballot initiative in Docket No. 981795-TL and the attributes of staff's modified Alternative #6 are significantly different. The balloting in the named docket proposed a changed calling scope, a new exchange rate for subscribers, and a full 7-digit number change. (EXH 1) The modified Alternative #6 relief option addresses the concerns of customers in the Debary and Sanford exchanges without an adjustment to calling scopes and exchange rates~~, and proposes an NPA change only - not a full number change~~. The Debary exchange customers would undergo an NPA change, however, the Sanford exception area customers would bear a full 7-digit number change due to possible code conflicts. (EXH 4) Staff believes that no other alternative meets the needs of customers in the 904 area code. Testimony in this proceeding from the service hearings, city and county resolutions, along with other record evidence such as letters and other comments, indicate a keen interest in providing Volusia County with an area code that encompasses the entire county, even if it means incurring a full 7-digit number change. (TR 55-56; EXH 2; EXH 12) However, based on the previous balloting analysis, staff believes that there may be some customers that do not want to change their telephone numbers. (TR 186-187)

9) In his testimony, BellSouth witness Stan Greer argues that due to the sheer geographic size of the 904 NPA, implementation of a geographic split plan is viable. (TR 186) Witness Greer indicates that implementing Alternative #6 would seem to keep together the regions that expressed strong community of interest at the various Service Hearings. (TR 185) Staff agrees. Witness Greer further states that this proposal is consistent with prior Commission decisions in implementing geographic split relief plans. (TR 186)

10) Volusia County and the City of Deltona witnesses strongly support a relief plan that will bring this region under a single NPA, and preclude the imposition of multiple overlays within their respective areas. (EXH 2; Volusia BR p.4) Staff believes that the modified version of Alternative #6 accomplishes both objectives.

Volusia County citizens, local government, business and civic organizations alike have strenuously advocated that the Commission improve the status of telecommunications in their communities. (EXH 2) To do so, the Commission was asked to "unite" the areas

discussed herein with a common NPA, and to expand or improve the local calling scopes throughout Volusia County. (EXH 2) Within the geographic limits of the city of Deltona, various local calling routes are either intra or interNPA, and require 7-digit or 10-digit dialing, and certain routes within the County are short-haul toll routes. (EXH 2)

Staff believes, however, that the statutory provisions for price regulated LECs in Section 364.051, Florida Statutes, limit the Commission's specific authority to expand or improve the local calling scopes. Furthermore, staff believes that the issue of area code relief is vastly different from the issue of expanded calling scopes. However, from the perspective of a "united" Volusia County, staff believes that a single NPA for Volusia County would result upon the implementation of staff's modified Alternative 6. If the NPA for Area B included the Debary exchange and the Sanford exception area, all of the area encompassing the geographic limits of the city of Deltona would be *intraNPA*, and therefore portions of this area would not be included in the 407/321 NPA overlay.

Staff acknowledges that moving the Debary exchange will require the affected subscribers to change their NPA, and are encouraged by BellSouth's expressed willingness to do so. (TR 186) However, staff disagrees with BellSouth witness Greer's assertion that " . . . the customers in Debary would need to make a full 10-digit number change." (TR 186) Staff believes that the NXX and full seven-digit number (NXX-XXXX) currently assigned to the Debary exchange customers could be directly assigned to the new NPA in Area B, thereby negating the requirement of a 10-digit number change. (EXH 8) Thus, staff believes that the likelihood of code conflicts would be diminished as well because the new NPA would be utilized. (EXH 7)

Staff believes that the events described which should coincide with the implementation of the modified Alternative #6 relief plan will not have any rate impact for the affected subscribers, based upon the similar calling scopes between the "old" exchange and the "new" exception area. BellSouth rate groups are incrementally structured according to local calling routes (calling scopes), and staff recommends that the calling scope for the Sanford exception area mirror that of the existing Sanford exchange, with a slight variation to account for two-way EAS between the two areas. (EXH 1) Table 1-6 reflects the current local calling scope for the Sanford exchange, with the variation necessitated by the modified version of Alternative #6 noted in italics.

TYPE OF ROUTE	**CURRENT LOCAL CALLING SCOPE FOR THE SANFORD EXCHANGE (Source: FPSC 1999 Comparative Rate Statistics) (EXH 1)**
ONE-WAY EAS	NONE
TWO-WAY EAS	DEBARY, GENEVA, OVIEDO, WINTER PARK, *and Sanford exception area*
ONE-WAY ECS	NONE
TWO-WAY ECS	ORLANDO and ORANGE CITY

Table 1-6: Current Sanford exchange local calling scope

If approved, the proposed calling scope for the Sanford exception area is shown in Table 1-7. The Sanford exchange, noted in italics, is included by the modified version of Alternative #6, but otherwise, the local calling scopes for the Sanford exchange and the proposed Sanford exception area are identical.

TYPE OF ROUTE	**PROPOSED LOCAL CALLING SCOPE FOR THE SANFORD EXCEPTION AREA**
ONE-WAY EAS	NONE
TWO-WAY EAS	DEBARY, GENEVA, OVIEDO, WINTER PARK, *and SANFORD*
ONE-WAY ECS	NONE
TWO-WAY ECS	ORLANDO and ORANGE CITY

Table 1-7: Proposed Sanford exception area local calling scope

With no change in the local calling scope, staff believes there will be no rate impact whatsoever for the affected subscribers because the BellSouth rate groups would be the same for each area (i.e., Sanford exchange and Sanford exception area) Staff's recommendation is that the Sanford exception area be grouped in a like manner as the current Sanford exchange.

Staff acknowledges that the establishment of the Sanford exception area will also require administrative modifications to other calling scopes as demonstrated by the 1999 Comparative Cost Statistics. (EXH 1) The modifications simply account for the existence of the exception area. The changes will not have any impact on the rate groupings for the affected exchanges. (EXH 1) Table 1-8 presents the other calling scope changes which result from the creation of the Sanford exception area.

TYPE OF ROUTE	**EXCHANGES WHICH WOULD NEED TO ADD THE PROPOSED SANFORD EXCEPTION AREA TO THEIR LOCAL CALLING SCOPE (Source: FPSC 1999 Comparative Rate Statistics) (EXH 1)**
ONE-WAY EAS	NONE
TWO-WAY EAS	DEBARY, GENEVA, OVIEDO, WINTER PARK, and SANFORD
ONE-WAY ECS	NONE
TWO-WAY ECS	ORLANDO and ORANGE CITY

Table 1-8: Exchanges which would need to add the Proposed Sanford exception area to their local calling scope

During the technical hearings, staff was directed to contact NANPA regarding the availability of the new area code. (TR 229-237) Thus, on the same day of the technical hearing, NANPA witness Tom Foley acknowledged, via telephone conference to staff and representatives of Volusia and Flagler Counties, that the 386 (FUN) area code has been reserved to provide relief for the 904 region. Staff notes that the Commission has received over 3,000 postcards from the customers in this area to receive the 386 NPA. During the technical hearing on 5/18/00, Sprint PCS stated that they might have some problems in using the 386 area code. (TR 229-237) Although they stated that they would provide some information in their post hearing statements, nothing was filed with the Commission. Thus, there is no additional evidence suggesting that there are any problems in using the 386 area code, even for Sprint PCS.

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Conclusion

Staff believes that the modified version of Alternative #6 would provide the most benefit to the customers and the industry. Therefore, with this alternative the following steps would be taken:

1) Exchanges located predominantly in Baker County would be moved to Region A.

2) Starke, Lawtey, and Kingsley Lake exchanges in Bradford County would be moved to Region A.

3) The Debary exchange from the 407/321 NPAs would be moved to Region B

4) An exception area of the Sanford exchange (Sanford exception area) would be established for the area referred to as Osteen. All affected customers would be assigned new 7-digit telephone numbers. Therefore, all of Volusia County residents would have the same NPA.

5) The Debary exchange's 407-NXX codes would be returned for assignment in the 407/321 NPA, which might extend its life expectancy.

In addition, the modified version of Alternative #6 would provide that:

a) There would be no rate impact for any of the affected subscribers.

b) The dialing pattern confusion (use of 7 or 10-digits and 904, 407, or 321 area codes) in southern Volusia County would be eliminated.

c) The life expectancy of Region A is 5.2 years, and that of Region B is 19.1 years. The difference in lives is 13.9 years. Therefore, this alternative is an acceptable one according to the INC guideline's 15 year rule.

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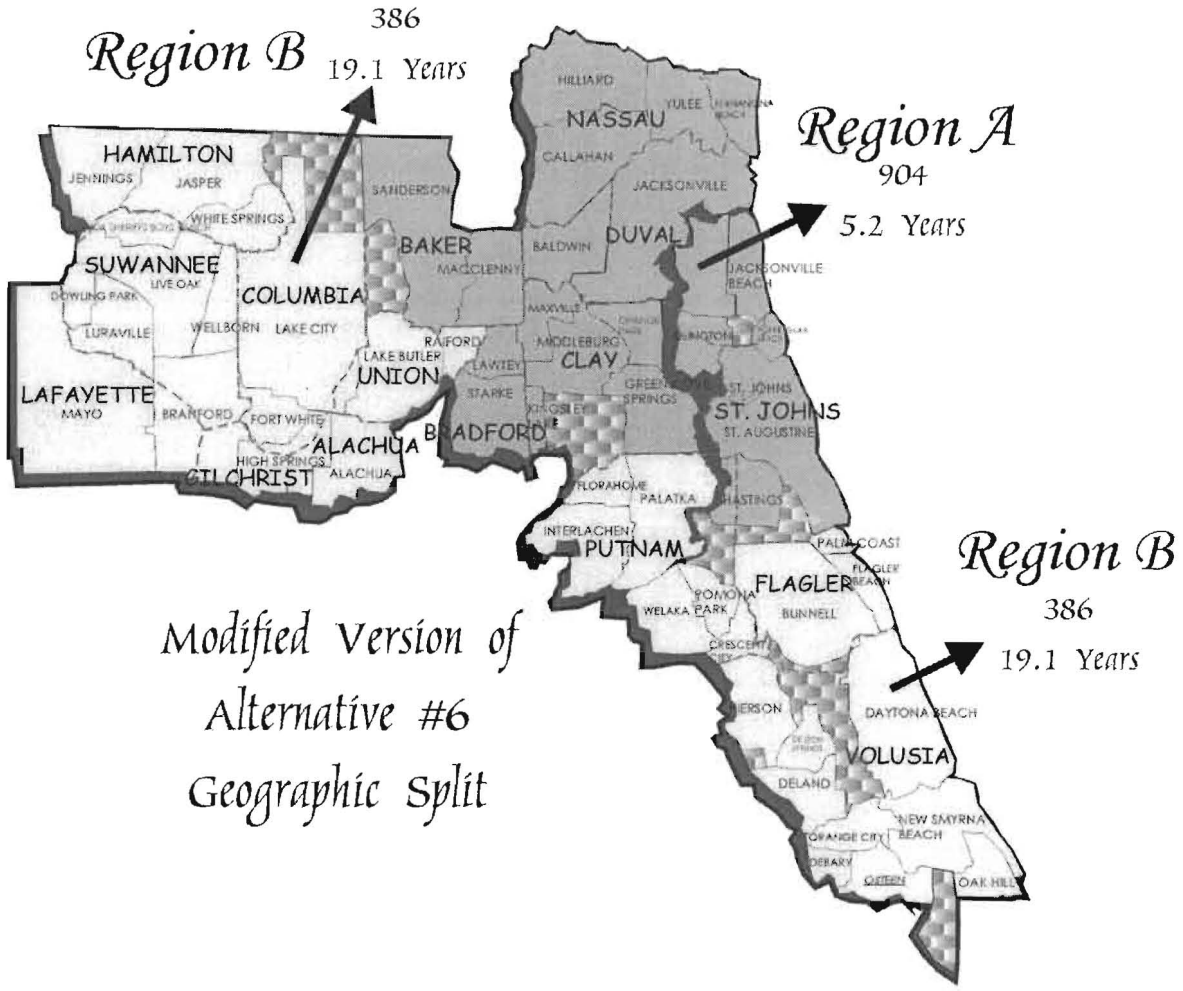
Based on the aforementioned discussion, staff's primary recommendation is to approve the Modified Version of Alternative #6 as shown in the figure below.

Because customers in the Sanford exception area may not want to change their telephone numbers, staff's alternative recommendation is to approve the Modified Version of Alternative #6, with a caveat, that the Sanford exception area be excluded from the 386 area code. The Sanford exception area would remain within its current area code parameters.



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Final Conclusion

Based on staff's discussions provided above for all of the area codes in this proceeding, staff recommends that the Commission should approve the industry's consensus relief plan for the 954 area code, and deny the industry's consensus relief plans for the 305/786, 561, and 904 area codes. Staff recommends that the Commission approve Alternative #11 for the 561 area code and Alternative #12 for the 305/786 area codes. In addition, staff's primary recommendation is for the Commission to approve the modified version of Alternative #6 for the 904 area code.

As an alternative recommendation for the 904 area code ,staff recommends that the Commission approve the modified version of Alternative #6, with the caveat, that the Sanford exception area be excluded from the proposed 386 area code.

ISSUE 2: a) What number conservation measure(s), if any, should be implemented, and

b) If conservation measures are to be implemented, when should they be implemented for the following area codes:

A) 305/786 (İLERİ)
B) 561 (İLERİ)
C) 954 (İLERİ)
D) 904 (İLERİ)

RECOMMENDATION: Staff recommends that the Commission adopt and order various number conservation measures as follows. First, staff recommends that the Commission implement thousand-block number pooling in the Daytona Beach MSA in the 904 area code and Fort Pierce-Port St. Lucie MSAs in the 561 area code with the time lines presented in the Staff Analysis. Second, staff recommends that the Commission order 75 percent utilization thresholds at the NXX level for all non-pooling carriers in the 305, 561, 786, 904, and 954 area codes as presented in the Staff Analysis. Third, in non-jeopardy and jeopardy situations, staff recommends that the Commission adopt the aging periods as presented in the Staff Analysis. Fourth, staff recommends that the Commission limit the ability of code holders to assign administrative numbers to multiple 1,000 blocks, as described in the Staff Analysis. Lastly, staff recommends that the Commission limit the allocation of NXX codes through rationing to three NXXs per month in the 561, 904, and 954 area codes beginning on March 1, 2001, April 1, 2001, and February 1, 2001, respectively, according to the procedure described in the Staff Analysis.

POSITIONS OF THE PARTIES:

ALLTEL: 2a A)-C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

2a D) Number pooling may provide an opportunity for extending the life of the 904 area code. To implement number pooling in the 904 area code, software release 3.0 should be used and should be limited to Local Number Portability (LNP) capable central offices.

2b A)-C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

2b D) The Commission should allow a reasonable time for the implementation of any number consideration measures, and they should only be applied prospectively.

AT&T: 2a The Commission should rely upon the number conservation measures developed and implemented in Docket No. 981444-TP, consistent with the policies and rules recently set forth in FCC Order No. 00-104, released March 31, 2000. Also in Docket No. 981444-TP, the Commission should continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC.

2b Number pooling should be implemented pursuant to the implementation schedule and requirements contained within Order No. PSC-00-1046-PAA-TP. The other conservation measures adopted by Order No. PSC-00-0543-PAA-TP should continue to be implemented as set forth therein. The remaining number conservation measures should be worked on through the process previously agreed to for Docket No. 981444-TP.

BELLSOUTH: 2a BellSouth supports the number conservation measures adopted in recent orders of the Commission in Docket 981444 regarding these NPAs. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission's staff before adopting any additional measures.

2b BellSouth supports the number conservation measures adopted in recent orders of the Commission in Docket 981444 regarding these NPAs. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission's staff before adopting any additional measures.

DELTONA: 2a It is the position of the City that number conservation measures should be adopted by the FPSC to avoid the future necessity for number overlay in the City of Deltona. The City supports the measures adopted by Order No. PSC-00-1046-PAA-TP,

together with local number portability and rate center consolidation.

2b As quickly as reasonably possible.

MCI WORLDCOM: 2a The Commission should rely upon the number conservation measures developed and implemented in Docket No. 981444-TP, consistent with the policies and rules recently set forth in FCC Order No. 00-104, released March 31, 2000. Also in Docket No. 981444-TP, the Commission should continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC.

2b Number pooling should be implemented pursuant to the implementation schedule and requirements contained within Order No. PSC-00-1046-PAA-TP. The other conservation measures adopted by Order No. PSC-00-0543-PAA-TP should continue to be implemented as set forth therein. The remaining number conservation measures should be worked on through the process previously agreed to for Docket No. 981444-TP.

NANPA: 2a Takes no position on the issue.

2b Takes no position on the issue.

NORTHEAST: 2a A)-C) Northeast is not a party in the 305, 561 and 954 cases, so it has no position.

2a D) Northeast supports the number conservation measures recently adopted by the Florida Public Service Commission in Docket No. 981444-TP. Number pooling appears to provide an opportunity for extending the life of the 904 area code by a few years. To implement number pooling in the 904 area code, software release 3.0 should be used and should be limited to Local Number Portability (LNP) capable central offices.

2b A)-C) Northeast is not a party in the 305, 561 and 954 cases, so it has no position.

2b D) The Commission should allow a reasonable time for the implementation of any number consideration

measures, and they should only be applied prospectively.

OMNIPOINT: 2a A) 305/786 - Omnipoint supports implementation of rate center consolidation for the Dade and Monroe County areas.

2a B) 561 - Omnipoint supports implementation of rate center consolidation for the Palm Beach County and surrounding areas comprising the 561 area code.

2a C) 954 - Omnipoint supports implementation of rate center consolidation for the Broward County area comprising the 954 area code.

2a D) 904 - No position.

2b A) 305/786: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

2b B) 561: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

2b C) 954: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

2b D) 904: No position.

SPRINT: 2a A)-D) Based on the record the only conservation measure the Commission should consider are the thousands block number pooling trials consistent with the revised plan submitted by the Joint

Petitioners on in Docket No. 981444-TP. See, Order PSC-00-1046-PAA-TP.

2b Based on the record the Commission should only consider implementation of thousand block pooling trials on a time frame consistent with the revised plan submitted by the Joint Petitioners on in Docket No. 981444-TP. See, Order PSC-00-1046-PAA-TP.

VOLUSIA: 2a None.

2b None.

STAFF ANALYSIS:

As part of its ongoing effort to conserve area codes, on April 2, 1999, the Commission filed a petition with the FCC seeking authority to implement number conservation measures, which would help minimize consumer confusion and costs associated with imposing new area codes too frequently.

On September 15, 1999, the FCC issued an Order (FCC 99-249) granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures.[12] In its Order, the FCC granted the Commission interim authority to:

(1) Institute thousand-block pooling (1KNP) by all LNP[13]-capable carriers in Florida;
(2) Reclaim unused and reserved NXX codes;
(3) Maintain rationing procedures for six months following area code relief;
(4) Set numbering allocation standards;
(5) Request number utilization data from all carriers;
(6) Implement NXX code sharing; and
(7) Implement rate center consolidation.

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[12]Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, NSF File No. L-99-23 (rel. September 15, 1999) (EXH 1)

[13]LNP (Local Number Portability) is a service that provides residential and business telephone customers with the ability to retain, at the same location, their existing local telephone numbers when switching from one local telephone service provider to another.

On October 20, 1999, a staff workshop was held to discuss these measures, as noted in Order No. PSC-00-1046-PAA-TP. A Florida Numbering Steering Committee was formed to address numbering issues. This committee created five working groups: 1KNP, short term efficiency measures, code sharing, rate center consolidation, and legal issues. (EXH 1; Item 18 - Florida Commission Orders)

On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making, (FCC 00-104) in the matter of Number Resource Optimization. Staff believes that this Order does not affect the Commission's delegated authority nor has any party suggested that the Commission's authority is affected, as explained in PSC-00-0543-PAA-TP. In FCC 00-104 at paragraph 4, the FCC addressed the two major factors that contribute to number resource exhaustion:

> the absence of regulatory, industry, or economic control over requests for numbering resources, which permits carriers to abuse the allocation system and stockpile numbers, and the allocation of numbers in blocks of 10,000, irrespective of the carrier's actual need for new numbers. (EXH 1)

In addition, the FCC addressed other number conservation measures, as well as issues related to the future implementation of thousand-block number pooling on a national basis.

ALLTEL witness Harriet E. Eudy claims that the Commission should consider implementing number conservation measures for the 904 area code on a "prospective basis" or, in other words, staff notes that witness Eudy believes that number conservation measures should be implemented after providing area code relief for the area. (TR 119) Witness Eudy also believes that using number conservation measures on a "retroactive basis" would cause confusion and would not significantly lengthen the life of the existing area code. (TR 119) Northeast witness Deborah L. Nobles supports ALLTEL witness Eudy's position. (TR 134) Staff is not persuaded by this testimony as the witnesses did not explain how customers would even be aware of the conservation measures. Moreover, experience in other states has shown that implementing number conservation measures on a "retroactive basis" does extend the life of the existing area code. (EXH 1; Item 7 - Other Documents)

AT&T witness Richard Guepe states that any number conservation that the Commission implements should be in compliance with the FCC's recent Order No. 00-104, issued March 31, 2000, in FCC Docket No. CC 00-200. (TR 148) Staff agrees with witness Guepe's statement.

MCI WorldCom witness Greg Darnell argues that the problem of premature exhaustion cannot be solved without addressing the inefficiencies in the assignment and use of NXX codes. (TR 203) Staff agrees and provides the following recommendations:

A. Number Pooling

Thousand-block number pooling involves the allocation of blocks of one thousand sequential telephone numbers within the same NXX code to different service providers. (EXH 1; EXH 6; EXH 8)

Sprint witness Scott Ludwikowski states that any number conservation measure that the Commission implements will affect their network system. (TR 51) In his testimony, witness Ludwikowski discusses five number conservation measures, one of which is number pooling. Witness Ludwikowski states that for number pooling to take place, carriers must have the technical local number portability (LNP) capability so that telephone numbers can be ported and distributed in blocks of 1,000. (TR 64) In addition, witness Ludwikowski further states that according to FCC Rule 52.23(b) and (c), all wireline carriers were required to provided LNP capability in at least the 100 most populous Metropolitan Statistical Areas (MSAs) by December 31, 1998. (TR 64; EXH 1) Those carriers unable to provide LNP capability at this time include the wireless carriers and some LECs with territory outside the 100 most populous MSAs. In addition, Sprint witness Scott Ludwikowski states that while the wireless industry is not required to implement number pooling at this time, network modifications are needed so that calls made by their customers to persons with assigned pooled numbers can be successfully routed. (TR 67)

Witness Ludwikowski also indicates that pooling is possible when there are plenty of uncontaminated 1,000 blocks. (TR 58) However, staff notes that carriers may return blocks with low contamination, provided that the contamination is less than 10% per the INC thousand-block number pooling guidelines. (EXH 1)

City of Deltona witness Wayne Gardner states that the Commission should require allocation of NXXs in smaller blocks to extend the life of area codes. (TR 37) In his testimony, witness

Gardner states that LNP should be required by all carriers, including cellular phone and pager companies. (TR 41) Staff notes that the FCC already determined in FCC 99-286, released on July 2, 1996, that the cellular phone companies, broadband PCS and covered specialized mobile radio (SMR) providers would be exempt from implementing LNP; however, they must provide LNP capability by November 24, 2002, pursuant to the FCC's Rule 52.31(a). (TR 65; EXH 1)

AT&T witness Richard Guepe indicates that number pooling would help extend the lives of the 561, 954, and 904 area codes. (TR 149) Staff agrees because NXX codes would be assigned in blocks of 1,000 to multiple carriers.

The FCC's Florida Order (FCC 99-249) and FCC's Numbering Resource Optimization Order (FCC 00-104) clearly acknowledged that 1,000-block number pooling trials would aid in developing national pooling implementation, architecture and administrative standards. (EXH 1) In addition, the FCC concluded in numerous orders such as FCC 99-122, FCC 99-249, and FCC 00-104 that number pooling is an important and necessary numbering resource optimization methodology, designed to extend the life of the NANP. Based on the FCC's delegation of authority in numbering resources, the Commission ordered the implementation of three pooling trials in the 954, 561, and 904 area codes to begin on January 22, February 5, and April 2, 2000, respectively, by Order No. PSC-00-1046-PAA-TP in Docket No. 981444-TP. (EXH 1; Item 18 - Florida Commission Orders)

Staff, however, notes that the Florida pooling trials only include the Ft. Lauderdale, West Palm Beach, and Jacksonville Metropolitan Statistical Areas (MSAs). Based upon the evidence in support of number pooling, staff recommends that for number pooling to be more effective in the 561 and 904 area codes, the Daytona Beach MSA in the 904 area code and the Fort Pierce-Port St. Lucie MSA in the 561 area codes should be included.

The FCC states that the state commissions, including Florida, must allow sufficient transition time between pooling trials. Specifically, ¶ 19 of FCC 99-249 states:

> After having implemented a thousands-block number pooling trial in one MSA, the Florida Commission may wish to expand to another MSA. Should it wish to do so, we direct the Florida Commission to allow sufficient transition time for carriers to undertake any necessary steps, such as modifying databases and upgrading switch software, to

> prepare for an expansion of thousands-block pooling to another MSA. In other words, start dates for thousands-block pooling trials in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps. The purpose of a staggered roll-out is to provide carriers time to upgrade or replace their SCPs and other components of their network, as necessary, if the increased volume of ported numbers as a result of the pooling trial requires them to do so. (EXH 1)

Based on this, staff recommends the following number pooling implementation time line for the Daytona Beach and Fort Pierce-Port St. Lucie MSAs:

	MSAs and NPAs	
Steps	**Daytona Beach 904**	**Fort Pierce-Port St. Lucie 561**
Regulatory Mandate	October 2, 2000	October 2, 2000
First Implementation Meeting	October 23, 2000	November 20, 2000
Forecast /Utilization Report	November 6, 2000	December 4, 2000
Block Protection Date	December 4, 2000	January 5, 2000
Block Donation Identification Date	December 6, 2000	January 8, 2000
PA Assessment of Industry Inventory Surplus /Deficiency	December 27, 2000	January 29, 2000

Block Donation Date: SP Updates LERG on Donated Blocks	February 26, 2001	April 9, 2001
Pool Start / Allocation Date: PA updates LERG on Allocated Blocks	March 12, 2001	April 30, 2001
Mandated Implementation Date	March 12, 2001	April 30, 2001
Telephone Number Assignment from 1K Block	April 9, 2001	May 13, 2001

Staff believes that this time line provides sufficient intervals for the necessary activities, and is comparable to the time lines prescribed in PSC-00-1046-PAA-TP for the other Florida pooling trials. Staff notes that this is an achievable and effective track that the industry should be able to follow, based on PSC-00-1046-PAA-TP and other state orders. (EXH 1; Item 7 - Other Documents) Staff believes that the industry should use the most current 1,000-block pooling INC Guidelines, because the INC Guidelines are updated frequently to incorporate the FCC's decisions.

In addition, staff recommends that any cost issues should be investigated in a separate docket pursuant to PSC-00-1046-PAA-TP, issued May 30, 2000, in Docket No. 981444-TP. In that order, the Commission acknowledged the FCC's rules and orders requiring the Commission to resolve any matters related to cost recovery under the federal law, and agreed to open a docket to address this issue. (EXH 1)

B. Guidelines for Managing and Obtaining Thousand-blocks

Sprint witness Ludwikowski describes thousand-block number management guidelines as an internal process that carriers can utilize in assigning available numbers to their customers. (TR 53) Witness Ludwikowski states that when a carrier begins to manage its

available numbering resources in blocks of 1,000, it separates contaminated blocks from uncontaminated blocks. The INC Thousand Block Pooling Guidelines define a contaminated block as:

> a block of one thousand telephone numbers in which at least one telephone number is in any of the following categories: administrative number, aging number, assigned number, or reserved number. (EXH 1)

Once the blocks are separated, the carrier assigns numbers first from the contaminated blocks. In addition, witness Ludwikowski claims that the carrier does not necessarily have to assign numbers sequentially within each block. This enables a carrier to assign numbers only from contaminated blocks until the carrier's inventory of numbers falls below the projected demand for numbers over a specified period of time. (TR 54-55)

Witness Ludwikowski states that the benefit of thousand-block number management guidelines is to minimize the number of 1,000 blocks that are contaminated so that more blocks can be contributed to the pool once pooling begins. (TR 56) Sprint witness Ludwikowski further states that these guidelines make it possible for a carrier to satisfy bona fide customer requests for particular numbers within thousand blocks, unlike sequential numbering. (TR 62) Witness Ludwikowski, however, does not address the issue of how long the life of an area code could be extended through these measures. (TR 56)

On March 16, 2000, the Commission issued Order No. PSC-00-0543-PAA-TP, mandating the implementation of certain 1,000-block number management requirements. (EXH 1) Staff believes that the thousand-block number management requirements are consistent with the authority delegated by the FCC in FCC 99-249. (EXH 1; Item 2 - FCC Orders and Rules, Items 5 and 6 - Other Documents) Although the requirements may limit a customer's choice for specific numbers or specific ranges of numbers, staff does not believe that the requirements deprive customers of their choice of carriers or prevent the carriers from requesting additional numbering resources. Staff agrees with Sprint witness Ludwikowski that this requirement maximizes the number of 1,000 blocks that can be contributed to the pool, thereby making pooling even more effective. (TR 58)

Staff notes that in certain rate centers, several carriers have assigned one number out of a thousand number block to a customer and allocated 100 numbers for administrative purposes. Since 101 out of the 1,000 numbers in the block are then deemed

unavailable, the block is reported contaminated beyond the 10% threshold even though only one number has actually been assigned to a customer. For LNP capable carriers, this means that such blocks will be ineligible for donation to the 954, 561, and 904 pooling trials. To prevent this problem from occurring, staff believes that efficiency measures such as sequential number management guidelines and fill rates should be implemented. (EXH 1; Items 5, 6, and 9 - Other Documents; EXH 6)

Staff recommends that the Commission adopt criteria for opening and obtaining additional numbering resources, including thousand-blocks, in addition to the existing 1,000-block management number management guidelines. These criteria are explained in the following discussion.

B-1. Guidelines for Opening New Thousand-blocks within an Assigned NXX

Sequential numbering minimizes contamination of NXX codes and 1,000-blocks by requiring carriers to use blocks in a systematic order. (EXH 1) Staff notes that in situations where carriers have significant numbers available in a given rate center, sequential numbering measures could prevent the opening of new blocks or NXX codes. (EXH 1)

Sprint witness Ludwikowski states that 1,000-block management guidelines are similar to sequential numbering. (TR 60) Witness Ludwikowski reasons that with sequential numbering, carriers would be required to assign telephone numbers one after the other (e.g., NXX-2001, NXX-2002, NXX-2003). However, with 1000-block management rules, carriers would have the flexibility to assign numbers within 1,000 blocks (e.g., NXX-2056, NXX-2783, NXX-2122). (TR 60) On the other hand, staff notes that there are valid reasons why numbers cannot always be assigned consecutively. Witness Ludwikowski states that wireless pre-paid service is a good example for the assignment of special numbers. (TR 60-61) Staff agrees with witness Ludwikowski.

Sprint witness Ludwikowski explains that it would be difficult to administer strict sequential number assignment, especially for the wireless carriers. He states that wireless carriers should be able to distinguish pre-paid customers from ordinary, post-billed customers. (TR 61) Witness Ludwikowski indicates that some wireless carriers obtain a separate NXX code just for their pre-paid service. He calls this NXX a special code. Witness Ludwikowski claims that it would be very costly and time consuming to make

changes. Therefore, he believes that such modifications would be uneconomical and unprofitable. (TR 61)

City of Deltona witness Wayne Gardner states that systematic number assignments would be an effective number conservation measure. (TR 37) Staff agrees, as discussed below.

In FCC 00-104, the FCC required a form of sequential numbering, while acknowledging that strict sequential numbering would be too prescriptive to accommodate customer demand. In ¶ 245 of this order, the FCC states that there is an exception which is intended to address customer requests for blocks of numbers that cannot be filled from the carrier's open blocks, rather than for a specified individual number. This paragraph states:

> Under our requirement, a carrier that opens a clean block prior to utilizing in its entirety a previously-opened thousands-block should be prepared to demonstrate to the state commission: (1) a genuine request from a customer detailing the specific need for telephone numbers; (2) the inability on the part of the carrier to meet the specific customer request for telephone numbers from the surplus of numbers within the carrier's currently activated thousands-block. We believe that this requirement will improve carrier efficiency in utilizing numbering resources, while maintaining carrier flexibility in meeting customer demand. We also acknowledge that this requirement has the potential to forestall other thousands blocks from becoming contaminated - and thus ineligible for possible donation to a pool. We also find that sequential number assignment may improve carrier efficiency in utilizing numbering resources, regardless of whether pooling is implemented. (EXH 1)

In addition, the FCC established Rule 52.15 (3)(j) in the same order which states the following:

> *Sequential Number Assignment.*
>
> (1) All service providers shall assign all available telephone numbers within an opened thousands-block before assigning telephone numbers from an uncontaminated thousands-block, unless the available numbers in the opened

> thousands-block are not sufficient to meet a specific customer request. This requirement shall apply to a service provider's existing numbering resources as well as any new numbering resources it obtains in the future.
>
> (2) A service provider that opens an uncontaminated thousands-block prior to assigning all available telephone numbers within an opened thousands-block should be prepared to demonstrate to the state commission:
>
> (i) A genuine request from a customer detailing the specific need for telephone numbers; and
>
> (ii) The service provider's inability to meet the specific customer request for telephone numbers from the available numbers within the service provider's opened thousands-blocks.
>
> (3) Upon a finding by a state commission that a service provider inappropriately assigned telephone numbers from an uncontaminated thousands-block, the NANPA or the Pooling Administrator shall suspend assignment or allocation of any additional numbering resources to that service provider in the applicable NPA until the service provider demonstrates that it does not have sufficient numbering resources to meet a specific customer request. (EXH 1; Item 2 - FCC Orders and Rules)

By Order No. PSC-00-1046-PAA-TP in Docket No. 981444-TP, the Commission acknowledged the Joint Petitioners' Offer of Settlement to Resolve the Number Pooling Implementation Protest of Order No. PSC-00-0543-PAA-TP. (EXH 1; Item 18 - Florida Commission Orders) This April 11, 2000, stipulation, approved by the Commission states

> Most affected carriers have been managing thousands-blocks consistently with the PAA Order for nearly a year under the voluntary measures, and all are now required to do so. Moreover, under the terms of FCC Order 00-104, additional number allocation requirements will be effective that should serve to further conserve numbers and blocks.

Staff acknowledges that Order No. PSC-00-1046-PAA-TP in Docket No. 981444-TP approving this stipulation adopts the FCC's process for sequential number management. Therefore, staff believes there is no need for additional guidelines to control the opening of new thousand-blocks within an assigned NXX.

B-2. Criteria for Obtaining Additional Numbering Resources:

Staff notes that the industry currently has no fill rate (i.e., utilization rate) requirement for NXXs or thousand-blocks, but rather employs a months-to-exhaust (MTE) calculation for purposes of determining when to request another NXX. (EXH 1; Item 2 - Other Documents) MCI WorldCom witness Greg Darnell claims that the forecasted MTE process which is currently in place is the best way to effectively manage number utilization. (TR 210) Staff disagrees and notes that State Commissions have not been satisfied that the MTE calculation by itself is a sufficient test for determining the need for new numbering resources. (EXH 1; Item 7 - Other Documents) Thus, the states have investigated whether the combination of a utilization rate and MTE calculation is a more accurate determination of need. (EXH 1; Item 7 - Other Documents)

Staff notes that fill rates or utilization thresholds improve the efficiency with which numbers are used by requiring carriers to use contaminated blocks up to a specified percentage before they can receive and use additional blocks. (EXH 1) NANPA witness Tom Foley states that utilization thresholds are applied in other states and are considered a conservation measure. (EXH 6) In fact, California and other state commissions are using a 75% fill-rate requirement as a means of number conservation. (EXH 1; Item 7 - Other Documents) In his deposition, BellSouth witness Stan Greer also stated that utilization thresholds could be a technique for number conservation. (EXH 8) Staff agrees with both witnesses.

Further, paragraph 29 of FCC Order 99-249 reads in part:

> Specifically, the Florida Commission may require that carriers achieve a certain fill rate in growth NXX codes and within thousands blocks, in areas where it has implemented thousands-block pooling. (EXH 1)

In paragraph 31 of the same Order the FCC asked that the Florida Commission "consult and coordinate" with other state commissions that may obtain authority to impose fill rates to establish fill or utilization rates that are consistent with those imposed by other states. Since October 1999, staff has

participated, via conference calls, in a multi-state working group whose purpose is to coordinate the efforts of states having authority or awaiting the delegation of numbering authority from the FCC. (EXH 1; Item 18 - Florida Commission Orders)

One of the primary reasons why Florida petitioned the FCC for authority to impose a utilization rate was that some carriers who have been assigned NXXs do not have an existing or projected need for the 10,000 telephone numbers available in an NXX. (EXH 1; Item 4 - Other Documents) Thus, many numbers remain unused and unavailable for assignment to any other carrier. In addition, current INC guidelines allow carriers to assign numbers throughout the entire 10,000 block if there is a bona fide number request from a customer, thereby reducing the opportunity to impose any sort of sequential number management and number utilization criteria. (EXH 1) Staff notes that this situation can be particularly troublesome to carriers who are unable to obtain NXXs in a timely manner due to NXX rationing brought on by premature area code exhaust.

Bell Atlantic filed comments in FCC Docket 99-200 recommending the establishment of utilization thresholds as a substitute for requiring wireless carriers to participate in pooling. (EXH 1) Staff believes that this proposal is reasonable. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making on Numbering Resource Optimization in CC Docket No. 99-200 (FCC 00-104). In ¶ 103 of this order, the FCC states:

> The current MTE[14] Worksheet provides limited information by which to evaluate a carrier's "need" for numbers. To ensure that carriers obtain numbering resources when and where they are needed to provide service, we require carriers to provide evidence that, given their current utilization and recent historical growth, they need additional numbering resources. We also require the NANPA to verify carriers' need. As discussed in more detail below, we adopt a minimum utilization threshold that non-pooling carriers must satisfy before obtaining additional numbering resources. Additionally, we seek comment in a *Further Notice* on the precise level of the utilization threshold. We exempt pooling carriers from this additional utilization threshold requirement in recognition of

[14]Months to Exhaust

> their requirement to donate to the pool uncontaminated and lightly contaminated thousands-blocks that are not needed to maintain short-term inventory levels. We may, however, revisit the question of whether all carriers should be subject to meeting a utilization threshold to obtain growth numbering resources if we find that such thresholds significantly increase numbering use efficiency. (EXH 1)

In other words, the FCC finds that NANPA will verify a carrier's need by checking the carrier's current utilization threshold level in the Months to Exhaust (MTE) Worksheet, and then comparing it to a minimum utilization threshold. The FCC believes that these are the only requirements that must be met for carriers to receive growth numbering resources. (EXH 1) Staff recommends that this utilization threshold criteria should only apply to non-pooling carriers in both jeopardy and non-jeopardy area codes. In addition, the FCC in Order No. 00-104 acknowledged state commissions' ability to set a utilization threshold. (EXH 1)

In paragraph 115 of this same order, the FCC states:

> [W]e are convinced that requiring carriers not participating in pooling to meet a utilization threshold before they receive a growth code is an equitable way to make sure that carrier requests are needs-based. We therefore adopt a nationwide utilization threshold for non-pooling carriers beginning January 1, 2001. We are less certain, however, at what level the threshold should be set. Parties that commented on a specific utilization rate all suggested thresholds within 60-90% range. We believe, however, that most of the suggested utilization thresholds included in the numerator were based on additional categories besides *assigned numbers*. Additionally, state commissions are in the process of conducting or completing utilization studies for specific NPAs and we hope to examine the results of those studies and learn what actual utilization levels carriers are now achieving. (EXH 1)

In April 2000, the Commission filed a petition for reconsideration and comments to the FCC. The Commission stated that the utilization rates in Florida vary by area code, by rate center, and by carrier. The Commission suggested that a higher

fill rate requirement be imposed for major market areas and extraordinary jeopardy areas than non-jeopardy areas. Thus, the Commission recommended that the FCC adopt an acceptable range and allow state commissions to set target utilization thresholds within that range. (EXH 1)

A single utilization rate may not be applicable to all states, given that some states have only one area code; NXX growth varies between rural and urban areas; and the number and type of new entrants is not predictable. (EXH 1; Item 7 - Other Documents) However, the states do agree that the utilization rate should require that a carrier use a significant percentage of the available numbers before filing a request for a new NXX. Many states including Florida, California, Maine, New Hampshire, Massachusetts, and New York have concluded that a 75% utilization rate, in combination with the MTE calculation, is a reasonable combination of criteria to be employed when assessing a request for numbering resources. Currently, the 75% utilization rate is used in California, Maine, New Hampshire, Massachusetts, and New York. (EXH 1; Item 7 - Other Documents)

In his testimony, Sprint witness Ludwikowski pointed out four problems related to fill-rate requirements (TR 70): (1) The FCC has ruled that fill rates cannot be used for the assignment of initial codes, (2) use of a fill rate by itself may result in the assignment of numbers to a carrier that does not need them, (3) the fill rate procedure may not adequately address fast growing carriers, and (4) the fill rate procedure does not address the assignment of a special use code. (TR 71-72) Staff agrees, in part, with witness Ludwikowski's statements in (1) and (3) because the witness' contention that carriers would get new codes if they are able to do so seems reasonable. (TR 71-72)

Sprint witness Ludwikowski believes that wireless carriers have a higher utilization rate; therefore, they should not be required to meet a utilization threshold. Witness Ludwikowski further explains his reasoning by indicating that the wireless carriers do not require a separate NXX for each landline rate center. (TR 68) Witness Ludwikowski states that wireless carriers have obtained NXX codes in only 14% of all incumbent LEC rate centers. (TR 69)

Sprint witness Ludwikowski states that implementation of a utilization criteria would take 30 to 60 days upon the issuance of the Commission's order. (TR 83) Witness Ludwikowski further states that "[S]print PCS does not oppose establishment of fill rates - so long as the Commission establishes a 'safety valve' procedure for

carriers growing rapidly." (TR 70) The FCC's Florida Order (FCC 99-249, ¶30) stated that the Commission should allow some flexibility in establishing fill rates and applying them to carriers to accommodate the unique situations that invariably arise. (EXH 1)

Pursuant to the FCC's Florida Order and other state orders, the FCC directed state commissions to find a uniform/national utilization threshold. Staff recommends that the number utilization threshold should be 75% for all non-pooling carriers in the 305, 561, 786, 904, and 954 area codes, to be consistent with decisions by other state commissions such as California, Maine, Massachusetts, New Hampshire, and New York. (EXH 1) Once non-pooling carriers achieve a 75% overall utilization rate within the NXX, the carrier can request the assignment of a new NXX in the same rate center.

Based on the evidence, staff believes that there are other number conservation measures that the industry could use to improve the available numbering resources by consuming them efficiently and effectively. Special, aging, and administrative numbers may be better utilized to improve the numbering resources in Florida. Staff presents its recommendations below:

B-2-a. Special Use Numbers or Codes

Staff plans to initiate an investigation into the broader use of the special codes such as 555 NXXs in all of Florida's area codes. Presently, only one number out of 10,000 is used to provide inter-area code directory assistance. Staff will explore the Commission's options for establishing standard numbers in the 555 NXX for providing time, emergency preparedness, and weather information services. Similarly, broader use of the 555 NXX throughout the state would result in return of NXX codes in other area codes for reallocation. The California Public Utilities Commission is currently investigating this issue. (EXH 1)

B-2-b. Aging Numbers

As stated in the California Commission's 310 Area Code report, numbers "age" between disconnection of one customer's service and the start of service for the next customer assigned the same number. (EXH 1; Item 7 - Other Documents) Staff believes that the aging process helps to reduce customer confusion which would occur if a number is reassigned too soon. (EXH 1) At the same time, staff notes that the carriers in Florida have number aging policies which

are neither consistent across carriers, nor consistent with industry guidelines.

Staff recommends that in non-jeopardy situations the Commission should adopt guidelines developed by the Industry Numbering Committee (INC) for aging of disconnected numbers, as follows:

> a) Residential telephone numbers should be aged no less than 30 days and no longer than 90 days from the subscriber-specific disconnect date.
>
> b) Business telephone numbers should be aged no less than 90 days but no more than 365 days from the subscriber disconnect date. (EXH 1; Item 2 - Other Documents)

In addition, staff recommends that in jeopardy situations, the Commission should adopt the same aging period for the residential telephone numbers. For business telephone numbers, the aging period should be no less than 60 days and not more than 180 days. Staff believes that these aging periods will free up more numbers for use because those numbers could be reassigned to others needing them, as demonstrated by the California Commission. (EXH 1)

B-2-c. Administrative Numbers

The California Commission's 310 Area Code report states that carriers use "administrative" numbers for internal purposes. (EXH 1; Item 7 - Other Documents) Carriers reported to the Commission in Docket No. 981444-TP that there are mainly three subcategories: (1) employee/official numbers, (2) test numbers, and (3) other numbers (e.g., location routing numbers, wireless E911 numbers, and temporary local directory numbers). (EXH 1)

Staff agrees with the conclusions in the California Commission's 310 Area Code report, and recommends that the Commission limit the ability of code holders to assign administrative numbers to multiple 1,000 blocks. (EXH 1; Item 7 - Other Documents) For maximum efficiency, administrative numbers that do not require assignment to specific 1,000 blocks for technical reasons should be assigned to a single 1,000 block within each NXX.

C. Reclamation of unused and reserved NXXs

In the FCC's Florida Order at ¶ 22, the FCC stated:

> Reclaiming NXX codes that are not in use may serve to prolong the life of an area code, because these codes are added to the total inventory of assignable NXX codes in the area code. Therefore, we grant authority to the Florida Commission to investigate whether code holders have activated NXXs assigned to them within the time frames specified in the CO Code Assignment Guidelines, and to direct the NANPA to reclaim NXXs that the Florida Commission determines have not been activated in a timely manner. This authority necessarily implies that the Florida Commission may request proof from all code holders that NXX codes have been "placed in service" according to the CO Code Assignment Guidelines. We further direct the NANPA to abide by the Florida Commission's determination to reclaim an NXX code if the Florida Commission is satisfied that the code holder has not activated the code within the time specified by the CO Code Assignment Guidelines. (EXH 1)

AT&T witness Richard Guepe states that the return of unused and reserved NXX codes that are older than six months provides an immediate benefit which is consistent with FCC Order 00-104. (TR 148) In his testimony, witness Guepe states that AT&T has returned approximately 20 NXX codes. (TR 149)

On the other hand, MCI WorldCom witness Greg Darnell testifies that the industry has established "strict" guidelines for NXX code reclamation and reservation. Witness Darnell expresses his view by indicating that the Commission should ensure that NANPA is effectively implementing these guidelines. (TR 208) Staff agrees, but does not believe that this process has been effective in Florida, as demonstrated by PSC-00-0543-PAA-TP.

For example, pursuant to the Commission's Order No. PSC-00-0543-PAA-TP and the FCC's delegation of authority in FCC 99-249, staff identified more than 200 NXX codes to be reclaimed. (EXH 1; Items 5, 6, and 9 - Other Documents) NANPA witness Tom Foley stated that as of May 10, 2000, only 53 codes were returned. (EXH 6) FCC Rules 52.15 (I)(5), (6), and (7) in FCC 00-104 specify the following:

> (5) The NANPA and the Pooling Administrator shall abide by the state commission's determination to reclaim numbering resources if the state commission is satisfied that the service provider has not activated and commenced assignment to end users of their numbering resources within six months of receipt.
>
> (6) The NANPA and Pooling Administrator shall initiate reclamation within sixty days of expiration of the service provider's applicable activation deadline.
>
> (7) If a state commission declines to exercise the authority delegated to it in this subsection, the entity or entities designated by the Commission to serve as the NANPA shall exercise this authority with respect to thousands-blocks. The NANPA and the Pooling Administrator shall consult with the Common Carrier Bureau prior to exercising the authority delegated to it in this provision. (EXH 1)

Staff notes that pursuant to PSC-00-0543-PAA-TP, issued March 16, 2000, the Commission ordered (consistent with the FCC's Florida Order) the following:

> In addition, we direct the NANPA to provide monthly LERG reports by area code, including the code assignment and activation dates, to us. We direct our staff, after it evaluates the reports, to contact NANPA to reclaim unused and reserved NXXs in all of Florida NPAs from all carriers who have not met the applicable INC 95-0407-008 guidelines as presented above. (EXH 1)

Staff notes that NANPA provided the current assignment of NPA-NXXs for each state on its web site. (EXH 4) Very shortly, staff will inform NANPA of any codes which should be reclaimed in Docket No. 981444-TP, in accordance with the Commission's decisions in that docket.

Reclamation Process

The job of distributing NXX codes has been delegated by the FCC to NANPA. Reclamation of codes involves the return of NXX codes to the NANPA when they have not been activated within the required

timeframe.[15] As noted by the FCC in FCC 00-104 and FCC 99-249, reclamation is one of the quickest and easiest number conservation measures to implement. (EXH 1; Item 2 - Other Documents, Item 18 - Florida Commission Orders) By reclaiming NXX codes that are not in use, the life of an area code is prolonged since the reclaimed codes are added to the total inventory of assignable NXX codes within area codes.

All requests for NXX codes are made directly to NANPA, pursuant to INC Guidelines. (EXH 1; Item 2 - Other Documents) According to these guidelines, after an NXX code is given to a carrier and made available for use[16], the carrier then has six months to activate the code and submit verification to NANPA that the code is activated.[17] This verification is satisfied when the carrier submits a "Part 4" form to NANPA. Prior to the FCC Numbering Order, state commissions, except Florida, played no role in the process of code reclamation. (EXH 1) Once a reasonable time is given to carriers to submit their Part 4 form verifications or request an extension of time within which to activate their NXX code, NANPA should recommend to the Industry Numbering Committee (INC)[18] which NXX codes should be reclaimed. The INC then makes a final decision regarding whether or not the codes should be reclaimed.

The FCC Numbering Order 00-104 redesigned this process and gave state commissions the ability to take an active role in the reclamation process. (EXH 1) Pursuant to this grant of authority

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[15] Pursuant to FCC Order 00-104, the Central Office Code Guidelines were modified to require code holders to return an NXX code if no numbers in the code are in service within 6 months after the effective published date of the NXX code. *Central Office Code (NXX) Assignment Guidelines*, INC 95-0407-009 (rev. June 19, 2000 effective July 16, 2000) at § 8.1. Further, the FCC Order requires that code reclamation procedures begin within 60 days after this 6-month deadline to ensure that NXX codes are returned in a timely manner.

[16] According to the INC Guidelines, there is a 66-day waiting period after assignment of an NXX code to a carrier by the NANPA and the ability of the carrier to provide the code to an end user. *Central Office Code (NXX) Assignment Guidelines*, INC 95-0407-008 (rev. June 19, 2000 effective July 16, 2000) at §6.1.2.

[17] See *Central Office Code (NXX) Assignment Guidelines*, INC 95-0407-008 (rev. June 19, 2000 effective July 16, 2000) at §6.3.3.

[18] The Industry Numbering Committee is a committee of the Alliance For Telecommunications Industry Solutions (ATIS) which attempts to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of numbering resources. ATIS is a North American standards body concerned with the development of telecommunications standards, operating procedures and guidelines.

from the FCC, state commissions can investigate and determine whether code holders have activated NXX codes within six months of them being available for use by the carrier. Further, state commissions may request proof from all code holders that NXX codes have been activated and assignment of the numbers has commenced. State commissions are required to accord the code holder an opportunity to explain the circumstances causing any delay in activating NXX codes in a timely manner. The FCC directed the NANPA to abide by the state commission's determination to reclaim an NXX code if the state commission is satisfied that the code holder has not activated the code within the time specified in the FCC Numbering Order.

As a result of this new ability for state involvement in the reclamation process, the Commission staff is developing a procedure (regarding the review of Part 4 forms) that should be implemented between the Commission and NANPA, pursuant to the FCC's Numbering Order 00-104. Staff will bring this process to the Commission for review and approval upon its completion.

Staff notes that the Commission filed Florida's Aggregated Utilization Information with the FCC. (EXH 1; Item 9 - Other Documents)

For informational purposes, the following Table 2-1 is a list of companies which have unused and reserved NXXs in Florida by area code:

Area Code		
561	**954**	**904**
BellSouth	Network Plus	BellSouth
Network Plus	Nextlink	e.spire
Nextlink	Level (3)	ITC^DeltaCom
Level (3)	e.spire	ALLTEL Wireless
e.spire	PaeTec Comm.	AT&T Wireless
ITC^DeltaCom	AT&T Wireless	AT&T local
Intermedia	Winstar	Winstar
PaeTec Comm.		
AT&T Wireless		
AT&T Local		
Winstar		

Table 2-1: List of Companies with Unused and Reserved NXXs

In addition, MCI WorldCom witness Greg Darnell states that his company supports the Number Resource Optimization working group's recommendation for federal guidelines to modify the number allocation process so that fees may be assessed on carriers when numbers are kept in reserve status for more than a year. (TR 211) Staff agrees because in jeopardy situations, due to rationing process, some carriers may not obtain numbering resources when they actually need them.

D. Rate Center Consolidation (RCC)

The FCC's Florida Order, FCC 99-249, ¶ 20, provides that "[f]ewer, larger pools logically increase the effectiveness of thousand-block pooling." (EXH 1) Staff agrees with Sprint witness Ludwikowski that RCC can result in significant efficiency gains, with or without pooling. This is even more effective in areas that have a large number of rate centers. (TR 81)

In ¶ 38 of FCC's Florida Order 99-249, the FCC also dictates that state commissions do not need to obtain FCC authority to implement RCC. The FCC states that RCC is within the authority of state commissions. However, the FCC strongly encourages the Florida Commission to proceed as expeditiously as possible to consolidate as many rate centers as possible. (EXH 1)

Sprint witness Ludwikowski recommends that the Commission focus its initial efforts on areas where the RCC could be implemented easily and effectively provided that this consolidation does not affect consumer rates. (TR 81) Witness Ludwikowski states the RCC will take a considerable amount of time to implement. (TR 83)

AT&T witness Richard Guepe states the Commission should take steps to implement RCC as soon as it can be designed and implemented. (TR 144)

BellSouth responded to staff's interrogatories regarding the implementation of RCC in the 305 area code. BellSouth stated that the estimated annual revenue effect of consolidating the seven rate centers of the Keys region into one, two, and three rate centers is $757,525, $757,525, and $546,563, respectively. (EXH 3)

BellSouth witness Stan L. Greer states that the Commission lacks authority to require companies who are subject to price regulation to implement RCC in Florida. (TR 174) However, witness Greer states that the BellSouth would voluntarily implement RCC, provided that the Commission allows BellSouth to recover the cost of implementation, on a revenue neutral basis. (TR 174) In addition, during the public hearings in the Keys, witness Greer stated that RCC would extend the life expectancy of area codes. (3/14/00 TR 24) In response to staff's second interrogatories, BellSouth states that "[S]ince number pooling is at the rate center level, reducing the number of rate centers prior to number pooling should result in more efficient pools." (EXH 3)

Staff agrees, and notes that in Docket No. 981444-TP, the Commission's working RCC group is preparing a comprehensive proposal on rate center consolidation. This proposal will be submitted to the Commission for review and approval. Therefore, staff believes that the RCC issues should be reviewed and addressed in Docket No. 981444-TP.

E. Maintaining rationing procedures for six months following area code relief

MCI WorldCom witness Greg Darnell states that maintaining rationing procedures for six months following area code relief is not beneficial. Witness Darnell believes that only the life of the new area code would be extended. Witness Darnell states that maintaining rationing procedures after a new area code is implemented creates a "pent up" demand for new telephone numbers. (TR 209)

Staff disagrees with witness Darnell's statements because maintaining rationing procedures for six months following area code relief implementation does not necessary imply that a new area code has been put in place. The old NPA could be used. Staff notes that in some situations, there could be enough NXX codes from the old NPA to meet a reasonable level of demand, with the new NPA available as a "safety net." This time interval may vary, and in some cases it could be about six months. Staff believes that the six-month rationing period for the old NPA should begin on the permissive dialing date. Staff notes that carriers would still be able to get NXX codes using the new NPA. The appropriate time interval for rationing should be predicated on the specific area code relief plan adopted by the Commission as discussed below.

F. Limiting the allocation of NXX codes through rationing to three NXXs per month in the 561, 954, and 904 area codes

NANPA witness Tom Foley in his deposition stated the following:

> That in order to have number pooling take effect or be in place, the area code lives would have to be extended because their projected exhaust dates even with the rationing right now, and that would necessitate further industry rationing procedures. (EXH 6)

Staff agrees, and notes that the current rationing procedures for the 561, 954, and 904 area codes allow 6 or 7 NXXs to be distributed. These numbers were reached by industry consensus. (EXH 1)

Staff also notes that in California's 310 area code, a large variance occurred with respect to forecasted NXX and NXX-X (1,000-block) demand. (EXH 1; Item 7 - Other Documents) The California Public Utilities Commission's analysis showed that the industry's initial forecasted demand for NXX-Xs versus what NeuStar (Pooling

Administrator) actually assigned to the industry was approximately 7 to 1. (EXH 1; Item 7 - Other Documents) In other words, the industry over-projected their demand. Staff believes that this situation clearly indicates that a stricter rationing procedure would enable carriers to obtain blocks when they actually need them, either from the old or new NPA.

Staff believes that once pooling takes place in the 561, 954, and 904 area codes, the demand for 1,000-blocks will decline. Therefore, staff recommends that the Commission approve limiting the allocation of NXX codes through rationing to three NXXs (30 1,000-blocks) per month in the 561, 954, and 904 area codes until all the NXXs in the 561, 954, and 904 area codes exhaust, pursuant to NANPA witness Foley's statement. (EXH 6)

Staff has created a time-line for implementation of the stricter rationing procedures. Staff believes that this time-line will not affect carriers' ability to obtain codes during the holiday seasons. Staff recommends the following time-line to begin the limited allocation of NXXs:

Area Code	Date to Start Stricter Rationing
561	March 1, 2001
904	April 1, 2001
954	February 1, 2001

Staff notes that based on the implementation of pooling trials in the 561, 954, and 904 area codes, and the California Commission's observations, staff believes that this time-line is manageable. (EXH 1)

Due to non-participating (non-LNP) carriers, the rationing process must differentiate between pooling and non-pooling carriers. Similar to procedures in California and other states, staff believes that these carriers would be assigned a full NXX provided that they meet the requirements presented in the previous body of the Staff Analysis. (EXH 1; Item 7 - Other Documents) Thus, staff recommends that only one of three NXXs in the old NPA be given out to the non-LNP carriers per month, and the remaining two NXXs (20 1,000-blocks) in the old NPA be given out to the participating LNP capable carriers.

G. Code Sharing

The Commission requested authority from the FCC to implement code sharing. The FCC Order No. 99-249 granted the Commission this authority on September 15, 1999. (EXH 1) To exercise the FCC's delegation of authority, regarding various number conservation measures, the Commission staff and the industry formed a code sharing group as a part of the Numbering Steering Committee. (EXH 1)

Staff notes that NXX code sharing is the process where an NPA-NXX associated with a specific rate center is distributed among the service providers that serve that rate center. For instance, if there were 10 carriers serving residents in a given rate center, the NPA-NXX would be assigned by 1000 blocks to a specific switch in each service provider's network. Accordingly, switches are identified by 7 digits (NPA-NXX-X), rather than the current 6 digit (NPA-NXX) identification. Code sharing differs from 1000 block pooling since pooling utilizes the existing LNP technology to share the numbers.

Staff notes that the code sharing group was composed of representatives of the telecommunications industry, the public, and the Commission staff. Based on the discussions, staff believes that NXX code sharing is technically feasible and economically viable. However, since the Commission's pooling order was issued for the 561, 904, and 954 area codes, little action has been undertaken by the working group. In addition, staff notes that the record in this proceeding is quite limited with respect to code sharing. Therefore, staff recommends that this issue be dealt with in Docket No. 981444-TP to identify and study the technical and economic feasibility of NXX code sharing, its implications for the delivery of emergency services, and network impacts.

H. Unified Dialing Plans for Overlays (UDPO)

During the service hearings in Ft. Lauderdale, Sun-Sentinel witness Leslie Hillman raised the question of why the telephone numbers cannot be increased to eight digits to provide more numbering resources. (1/19/00 10:00 TR 51) In preparation for this hearing, staff sent out interrogatories to the industry to find out the technical aspects of this methodology. (EXH 3) BellSouth defined UDPO as an abbreviated local dialing system which allows 8-digit dialing between overlay NPAs. In addition, BellSouth states that 8-digit UDPO also provides for one, consistent dialing pattern on local calls and assists customers by eliminating the need for

two different dialing patterns (i.e., 7 and 10-digit local dialing). (EXH 3)

The suffix represents one of the ten overlaid area codes, where 0 is the original area code. (EXH 3) For example, in an overlay situation where 310 (old NPA) and 220 (new NPA) area codes are used, all existing customers in the old NPA would have NPA-NXX-XXXX-0, and the new customers would have NPA-NXX-XXXX-1 as their telephone numbers.

BellSouth in its response also stated that the UDPO was submitted in July, 1998, as Issue #141 to the INC for examination. (EXH 3) However, the INC expressed concerns and reviewed the analysis done by the California Telecommunications Industry. The INC concluded that the proposal was unworkable due to technical, regulatory, competitive dialing (10-digit dialing requirement by the FCC), network timing (delay in routing calls) and customer education issues. (EXH 3) However, BellSouth has not addressed any technical issues in its response to the Commission.

Based on the July 1999, filing by Gilbert Yablon, staff entered the information provided into Docket No. 990457-TL. (EXH 2) According to Mr. Yablon, the UDPO does comply with the FCC's 10-digit requirement for overlays. (EXH 2) Mr. Yablon's Frequently Asked Questions documentation states

> This plan introduces new ideas which challenge the necessity of using 1+10-digits in order to maintain dialing parity in an overlay situation. In the Unified Dialing Plan, dialing parity is provided with only 8-digits.
>
> The INC's work in promoting uniform 10-digit dialing as a standard is to be applauded - it ensures that one method of dialing will work for all calls anywhere in the North American Numbering Plan. However, it does not exclude other methods of dialing from co-existing with it. The UDPFO does transparently co-exist with 1+10 digit dialing.
>
> The 12-digit format that is planned for the future does not necessarily render this plan unusable and unworkable. In addition, it is my understanding that Local Number Portability and other actions to conserve the existing resource should delay expansion until well into the next century. However, even with expansion, if thought is given

> to maintaining the same backward compatibility that the Unified Dialing Plan offers for overlays, this plan can very likely co-exist with a plan requiring any number of digits. (EXH 2)

Staff agrees with Mr. Yablon's analysis that any expansion in the NANP (NANPE) would require new network structuring. Staff believes that this method may have merits. However, due to lack of evidence in this proceeding, staff believes that this issue should be addressed in Docket No. 981444-TP.

I. Unassigned Number Porting

The concept and technical feasibility of unassigned number porting has been discussed at various meetings with the state commission staff. However, due to lack of evidence in this proceeding, staff believes that this issue should be addressed in Docket No. 981444-TP.

ISSUE 3: What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes?

A) 305/786 (BARRETT)
B) 561 (BARRETT)
C) 954 (AUDU)
D) 904 (AUDU, BARRETT)

RECOMMENDATION: The dialing patterns for local, toll, EAS, and ECS calls for the 305/786, 561, 954, and 904 area codes should be as follows: Local, EAS, and ECS calls on routes closed to IXC[19] competition should be on a 7-digit basis within a geographic area code, a 10-digit basis within an overlay area, and 10-digit basis between area codes and outside of an overlay area. Toll and ECS calling on routes open to IXC competition should be on a 1+10-digit basis. A summary is given in Table 3-1 below:

TYPE OF CALL	DIALING PATTERNS		
	Within Geographic Area Code	Within Overlay	Between Area Codes, Outside Overlay
Local/EAS	7	10	10
ECS Routes Closed to IXC Competition	7	10	10
ECS Routes Open to IXC Competition	1 +10	1 +10	1 +10
Toll	1 +10	1 +10	1 +10

Table 3-1: Dialing patterns for area code relief

[19]IXC: Interexchange Carrier

POSITIONS OF THE PARTIES:

ALLTEL: 3 A)-C) - ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

3 D) - If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls.

AT&T: Dialing patterns for local, toll, EAS, and ECS calls generally should be the same today as they are after relief is implemented, with two exceptions. For each relief plan utilizing an overlay, 10 digit dialing should be required for all landline local calls, EAS calls, and ECS calls without IXC competition, with 1+10 digit dialing being required for all landline toll calls and ECS calls with IXC competition. In the case of a geographic split, the area code must be dialed when calls are placed across NPA boundaries.

BELLSOUTH: Depending on the relief plan implemented by the Commission, listed below are the dialing patterns BellSouth believes the Commission should implement unless there is a technical limitation:

Type of Call	Dialing Patterns		
	Geographic Split Relief	**Overlay Relief**	**Between Area Codes** (Regardless of Relief Method)
Local/EAS	7 digit	10 digit	10 digit
ECS without IXC Competition	7 digit	10 digit	10 digit
ECS with IXC Competition	1+10 digit	1+10 digit	1+10 digit
Toll	1+10 digit	1+10 digit	1+10 digit

DELTONA: Local, EAS, and ECS - 7 digit dialing; Toll - 11 digit dialing.

MCI WORLDCOM: Dialing patterns for local, toll, EAS, and ECS calls generally should be the same today as they are after relief is implemented, with two exceptions. For each relief plan utilizing an overlay, 10 digit dialing should be required for all landline local calls, EAS calls, and ECS calls without IXC competition, with 1+10 digit dialing being required for all landline toll calls and ECS calls with IXC competition. In the case of a geographic split, the area code must be dialed when calls are placed across NPA boundaries.

NANPA: Takes no position on the issue.

NORTHEAST: 3 A)-C) - Northeast is not a party in the 305, 561 and 954 cases, so it has no position.

3 D) - If the industry recommendation is adopted, 10 digit dialing would be required for local, EAS and ECS calls, and 1 plus 10 digit dialing would be required for toll calls.

OMNIPOINT: 3 A)-C) - Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

3 D) No position.

SPRINT: If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls. For geographic splits, dialing patterns should be unaffected except for interNPA calls which should be dialed on a 10- or 11- digit basis as appropriate.

VOLUSIA: Local, EAS and ECS - 7 digit; Toll - 11 digit dialing.

STAFF ANALYSIS: Issue 3 addresses the recommended dialing patterns to be implemented in the 305/786, 561, 954 and 904 NPAs consistent with staff's recommendations in Issue 1.

On August 8, 1996, the FCC issued its Second Report and Order in CC Docket No. 96-98 (hereafter, FCC 96-333, EXH-1). This document addressed several aspects relevant to area code relief in general, and dialing patterns in particular.

Paragraph 278 states that the

> . . . numbering administration should: 1) seek to facilitate entry into the communications marketplace by making numbering resources available on an efficient and timely basis; 2) not unduly favor or disadvantage any particular industry segment or group of consumers; and 3) not unduly favor one technology over another.

FCC 96-333 provides that, in order to address potential competitive disadvantages, state commissions may choose to implement an all-services overlay only when the plans include:

> . . . 1) mandatory 10-digit local dialing by all customers between and within area codes in the area covered by the new code; and 2) at least one NXX is made available in the existing area code to every telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in the affected area code 90 days before the introduction of a new overlay area code. (¶283)

In paragraph 284, the FCC determined that 10-digit local calling in the overlaid area would be required, and concluded that this dialing pattern will ". . . ensure that competition will not be deterred in overlay area codes as a result of dialing disparity." (FCC 96-333)

In staff's analysis in Issue 1, three of the recommended area code relief plans involve all-services overlays (Alternatives 12 for the 305/786 NPA, 11 for the 561 NPA, and 1 for the 954 NPA recommend overlay relief plans), while the modified Alternative #6 for the 904 NPA recommends a split relief plan. Witness Greer, for BellSouth, though not addressing a specific NPA relief plan,

acknowledges that the institution of an overlay relief plan would be "competitively neutral, provided certain criteria is [sic] implemented such as 10-digit dialing for all local calls." (TR 175) The witness further states that the dialing pattern presented in his testimony, and again in BellSouth's brief, is consistent with prior FPSC decisions and the FCC's dialing parity order. (TR 175-177; BellSouth BR p. 10) Staff agrees with witness Greer's statements. Staff also believes that each NPA relief implementation will, however, have unique aspects, as demonstrated by each plan. (EXH 7)

A. 305/786 NPA:

Upon approval of staff's recommended alternative for the 305/786 area codes, and consistent with prior Commission decisions and FCC Orders, staff believes that the dialing pattern for subscribers will change, as 10-digit dialing will have to be implemented for all local calls placed between and within the area codes in the recommended relief plan, Alternative #12. (See FCC 96-333)

Customer witnesses Reich and Panico, residents of the Keys region, state that they want to keep the 7-digit dialing patterns as they are today, and express a reluctance to embrace 10-digit dialing. (3/14/00 TR 17, 32) Customer witness Reich presented 224 signed petitions on behalf of other citizens. (EXH 2) Customer witnesses Reich and Panico also express their desire to keep the 305 NPA along with 7-digit dialing, but through the course of discussion conceded that retaining both is not an available alternative. (3/14/00 TR 28, 32) Staff agrees with customer witness Panico who states that the primary economic interest in the Keys region is tourism, which she described as "fragile." (3/14/00 TR 33) The witness also offers that it is "most important" to keep the 305 code in order for the visiting public to "reach us." (3/14/00 TR 33) Staff acknowledges that even though the dialing pattern for subscribers placing *out-going calls* will change, consistent with the implementation of an overlay relief plan (See Docket No. 980671-TL), staff believes the existing tourism-related businesses that have their 305 telephone numbers widely distributed will not face any changes with respect to *in-bound calls*. (EXH-1)

Staff acknowledges that the Miami-Dade region of the 305/786 area code will, for all intents and purposes, be unaffected by the implementation of Alternative #12, as indicated by the Commission's Orders in Docket No. 980671-TL and 990223-TL. (EXH 1) For these subscribers, there will be no change whatsoever in their present dialing patterns. While staff recognizes that a dialing pattern

change will be necessary for the Keys region subscribers as a result of staff's recommendation, we believe that, as explained in Issue 4, the permissive dialing period will be sufficient for these subscribers to adapt. Furthermore, given the Keys' dependence on tourism, staff believes that the benefit of retaining existing 305 telephone numbers outweighs the inconvenience of a change in the dialing pattern.

B. 561 NPA:

If staff's recommended Alternative #11 relief plan is approved, the dialing pattern for subscribers in the 561 NPA will change, as 10-digit dialing will have to be implemented for all local calls placed between and within the area codes in the recommended relief plan. A summary of staff's recommended dialing patterns for all other types of calls was provided in Table 3-1 on the preceding page.

Much like the subscribers who attended the Key West service hearing in the 305/786 area code hearings, the subscribers in the 561 NPA expressed their preference to keep their present 7-digit local dialing pattern and also keep the 561 area code. (3/23/00 TR 19, 23, 24, 37) Customer witness Gidion states her concern that yet another area code change may occur, her fourth since living in Florida. (3/23/00 TR 37) Customer witness Walsh, president of the St. Lucie County Chamber of Commerce, offers a contrasting view and testifies:

> . . . our goal as a Chamber of Commerce and the business organization in St. Lucie County is to attract new businesses to our area, to retain the businesses that we have, to assist our businesses, and to protect and improve the quality of life for our residents. Anything that makes doing business in St. Lucie County easier, certainly is what we would support. Ten-digit dialing is not something we would like to see happen in our area. The creation of a new area code is something that the Chamber of Commerce would support. (3/23/00 TR 20-21)

Customer witness Gonzales, in expressing the preferences of State Representative Ron Klein states that he " . . . would like to see Palm Beach County keep its 561 area code and not go to 10-digit dialing." (3/23/00 TR 23)

Staff, however, believes that most, if not all, of the citizens present at the public hearings may not have realized that a dialing pattern change may be unavoidable, even with a "split" plan alternative. (3/23/00 TR 19, 23-24, 37) Depending upon the

placement of the "split" boundary or boundaries, 7-digit local, EAS, or ECS routes closed to IXC competition could become interNPA, necessitating a 10-digit call. BellSouth witness Greer provided a summary by alternative number and exchange name, of the routes that would migrate from 7-digit to 10-digit dialing if a "split" plan was implemented. (EXH 15) For the affected subscribers, this would represent a new local dialing pattern. Staff believes, therefore, that a change in the local dialing pattern may be inevitable, whether staff's recommendation (Alternative #11) is approved or not.

Staff interprets the testimony of customer witness Walsh as supporting a "split" alternative, though a specific alternative is not named. If so, we disagree with her assertion that the retention of 7-digit dialing under a "split" plan makes it easier to do business in St. Lucie County. Staff believes that the witness favors the 7-digit dialing pattern, as opposed to the 10-digit dialing pattern which would be imposed with an overlay relief plan. As with the 305/786 NPA relief, staff believes that the business community will experience a lesser impact from a change in the dialing pattern than it would from an outright change in an area code, which would be necessary for some subscribers under a "split" plan because staff believes that the benefit of retaining an existing 561 telephone number outweighs the inconvenience of a change in the dialing pattern.

Additionally, and as with the 305/786 NPA relief, staff believes that the permissive dialing period discussed in Issue 4 will be sufficient for the subscribers to adapt to the changes in the local, EAS, and certain ECS dialing patterns from 7-digits to 10-digits. ECS routes which are open to IXC competition and toll routes would be unaffected, and would continue to be dialed on a 1+10-digit basis, regardless of the area code relief alternative.

C. 954 NPA:

All of the parties to this docket agree that with the implementation of an overlay relief plan, the dialing patterns should be 10 digit for local, ECS and EAS calls within the overlaid area; and 1+10 digit dialing for calls on routes outside the overlaid area and on ECS routes that are opened to IXC competition.

In his testimony, BellSouth witness Baeza states that:

> The overlay option provides the most cost effective arrangement in that customer number changes would not be incurred. This option offers an equal NPA relief period for all

> customers and the most consistent and least confusing dialing arrangement since ten-digit dialing on a local basis would be required for the entire area. (TR 152)

Witness Baeza further testifies that implementing 10-digit dialing in the 954 NPA will ". . . eliminate the current confusion and dialing problems associated with the conflict between the 561 area code and the 561 NXX in Ft. Lauderdale . . . ." (TR 152) Witness Baeza asserts that with the overlay relief plan, current 7-digit local calls will change to mandatory 10-digit dialing. (TR 153) He further states that all toll calls and ECS calls on routes opened to competition will be dialed using 1+10 digits. (TR 153)

However, Ms. Margaret Bates, a Commissioner with the City of Lauderhill, presented a resolution from the City of Lauderhill at the Service Hearing. In this resolution, the City of Lauderhill expressed its preference for a geographic split relief plan in lieu of 10-digit local dialing. (1/19/00 TR 14) However, BellSouth witness Greer states that implementation of any geographic split relief plan in the 954 NPA will divide a major local calling scope within the county, indicating that with a geographic split relief plan

> . . . BellSouth will have no option but to implement a dialing delay of 4-6 seconds for most, if not all, switches in the 954 area. This delay would allow for the customer to complete their dialing before the switch began to route the call. (TR 181)

Based on the FCC provisions and the foregoing testimonies, staff recommends that the Commission approve a 10-digit dialing pattern for all local, ECS and EAS calls within the overlaid area; and 1+10-digit dialing for calls on routes outside the overlaid area and on ECS routes that are opened to IXC competition, as shown in Table 3-1.

D. 904 NPA:

Although the preferred industry NPA relief plan is an all service-area overlay, various parties have also tabled "second-best" NPA relief plans. (ALLTEL BR p.7; BellSouth BR P.7; Northeast BR p.7) Testimony from the service hearings, along with other record evidence such as numerous letters, comments, and other forms of communications, however, has shown an overwhelming preference for a geographic split NPA relief plan, with much interest in the issue coming from the citizens of Volusia County. (EXH 2; EXH 12)

Both Volusia County and the City of Deltona witnesses expressed their preference for a geographic split relief plan that will bring this region under a single NPA. (EXH 2; EXH 12) Furthermore, witness Gardner, a City of Deltona Commissioner, stated for a relief plan that would not impose another overlay on his city and for 7-digit local, EAS, and ECS dialing on a county-wide basis. (TR 37-38)

In his testimony, BellSouth witness Greer states that due to the sheer geographic size of the 904 NPA, implementation of a geographic split plan is viable. (TR 185) Witness Greer states that implementing Alternative #6 apparently keep together the areas that have expressed a strong community of interest at the various Service Hearings. (TR 185) Witness Greer further states that consistent with prior Commission decisions in implementing geographic split relief plans, Alternative #6 calls for 7-digit dialing for local, EAS and ECS calls (on routes closed to IXC competition) within the geographic area code, and 1+10 digit dialing for toll, interNPA and ECS calls (on routes opened to IXC competition). (TR 176-177)

In her testimony, Sprint witness Khazraee states that implementing Alternative #6 will divide the Kingsley Lake and part of the Starke exchanges into different NPAs, thus denying these communities their current 7-digit local calling to nearby communities. (TR 221) Witness Khazraee further states that splitting these communities in this manner will compel these communities to use 10-digit dialing to reach nearby communities. (TR 221) However, witness Khazraee conceded that by implementing the industry consensus overlay relief plan, ". . . all of these calls would also have to be dialed with ten digits . . . ." (TR 221) Staff notes that the modified version of Alternative #6 addresses Sprint witness Khazraee's concerns by not dividing the Kingsley Lake and parts of Starke exchanges into different NPAs. Their respective community of interest will remain intact, as will the intraNPA dialing pattern.

The modified version of Alternative #6 plan accomplishes some important objectives for providing the relief needed, while addressing some keen local issues in Volusia County. However, because it is a "split plan," some customers will have to change their local dialing patterns from 7-digits to 10- digits for dialing on certain local routes. Staff's modified Alternative #6 will create a division of the present 904 NPA that will cause certain routes which were *intraNPA* to become *interNPA*. Table 3-2 summarizes the affected routes for the modified version of Alternative #6.

TYPE OF ROUTE	**ROUTES WHICH CHANGE FROM intraNPA TO interNPA WITH STAFF'S MODIFIED ALTERNATIVE #6** **(Source: FPSC 1999 Comparative Rate Statistics) (EXH 1)**
ONE-WAY EAS	NONE
TWO-WAY EAS	KINGSLEY LAKE/LAWTEY
	KINGSLEY LAKE/RAIFORD
	KINGSLEY LAKE/STARKE
	SANFORD[20]/Sanford exception area[21]
	SANFORD[20]/DEBARY
	GENEVA/Sanford exception area[21]
	OVIEDO/Sanford exception area[21]
	WINTER PARK/Sanford exception area[21]
ONE-WAY ECS	NONE
TWO-WAY ECS	SANDERSON/LAKE CITY
	SANDERSON/MAXVILLE
	MACCLENNY/LAKE CITY
	MACCLENNY/MAXVILLE
	DEBARY/ORLANDO
	DEBARY/WINTER PARK
	ORLANDO/Sanford exception area[21]
	ORANGE CITY/Sanford exception area[21]

Table 3-2: Routes which change from intraNPA to interNPA with staff's Modified Version of Alternative #6

[20]Proposed Sanford Exchange (Seminole County portion of current exchange)
[21]Proposed New exception area (Area consisting of the portion of Sanford exchange in Volusia County)

Staff also believes that because the modified Alternative #6 features a realigned Volusia County and the creation of a new exception area, other routes which were previously *interNPA* will become *intraNPA*, as shown in Table 3-3.

TYPE OF ROUTE	**ROUTES WHICH CHANGE FROM interNPA TO intraNPA WITH STAFF'S MODIFIED ALTERNATIVE #6** **(Source: FPSC 1999 Comparative Rate Statistics)** **(See EXH 1)**
ONE-WAY EAS	NONE
TWO-WAY EAS	DEBARY/DELAND
	DEBARY/ORANGE CITY
ONE-WAY ECS	NONE
TWO-WAY ECS	Sanford exception area[21]/ORANGE CITY

Table 3-3: Routes which change from interNPA to intraNPA with staff's Modified version of Alternative #6

These changes also incorporate the establishment of the Sanford exception area, as discussed in Issue 1 of this recommendation. Tables 3-2 and 3-3 summarize all of the routes for which a dialing pattern change would be needed in staff's modified version of Alternative #6.

The dialing pattern - whether an intraNPA or interNPA route - is consistent, however, with the overall dialing patterns for area code relief, as shown in Table 3-1. Staff therefore recommends that the Commission implement the dialing patterns shown in Table 3-1 for the 904 NPA.

Conclusion:

The record shows that whether the Commission decides on the all-services overlay relief plans as recommended, or another alternative, the dialing pattern for local, toll, EAS, and ECS calls for the 305/786, 561, 954, and 904 area codes should be as

follows: Local, EAS, and ECS calls not subject to IXC competition should be on a 7-digit basis within a geographic area code, a 10-digit basis within an overlay area, and 10-digit basis between area codes and outside of an overlay area. Toll and ECS calling which is subject to IXC competition should be on a 1+10-digit basis.

Based on the above and consistent with the recommendations in Issue 1, staff therefore recommends that the dialing patterns for area code relief in the 305/786, 561, 954, and 904 NPAs should be as is given in the preceding Table 3-1.

REVISED 9/15/00

ISSUE 4: What is the appropriate relief plan implementation schedule for the following area codes?

A) 305/786 (BARRETT)
B) 561 (BARRETT)
C) 954 (AUDU)
D) 904 (AUDU)

RECOMMENDATION: Upon approval of Issue 1, staff recommends that the Commission approve the implementation schedule shown in the following table for the 305/786 and 904 area codes. In addition, staff recommends that the Commission withhold the approval of implementation schedules for the 561 and 954 area codes, pending the outcome of number pooling trials. Staff also recommends that the Commission order that the affected LECs jointly file a notice: (1) to inform the Commission of the outcome of various number conservation measures, and (2) to recommend the permissive and mandatory dialing periods for the 561 and 954 NPAs. This notice should be submitted to the Commission no later than October 1, 2001. Staff will file a recommendation for final Commission approval of the implementation dates filed in the notice. The Commission should also order the affected LECs to send a letter to alarm monitoring companies advising them of the need to reprogram their equipment as necessary nine months before the mandatory dialing period. The letter should be submitted to Commission staff for review in an expeditious manner so as to ensure that the reprogramming activities can be completed within the respective permissive dialing period.

AREA CODE	PERMISSIVE DIALING PERIOD BEGINS	MANDATORY DIALING PERIOD BEGINS
305/786	November 6, 2000	August 6, 2001
~~561~~	~~June 4, 2001~~	~~June 3, 2002~~
~~954~~	~~March 5, 2001~~	~~March 11, 2002~~
904	January 15, 2001	November 5, 2001

POSITIONS OF THE PARTIES:

ALLTEL: 4 A)-C) - ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

4 D) - Once the FPSC approves the recommended relief plan, NANPA can assign the new NPA within 14 days. The transitional dialing period, which permits customers to dial service on ten digits, should begin 90 days after the NPA is assigned and should continue for 180 days.

AT&T: Each relief plan should be implemented as stated in the industry recommendation. These implementation schedules should be prioritized by exhaust dates, but in no event should the implementation schedule be set in a manner where the NPA would be exhausted before the relief plan is fully implemented. The start of the area code relief implementation schedule may be postponed if there is a credible, reliable information that the Commission's conservation measures are proving successful, but in such case the new schedule would use the same implementation schedule beginning only at a later date. Any such later start dates would require additional industry and Commission input, planning, and coordination.

BELLSOUTH: BellSouth believes the Commission should evaluate each case as to whether an implementation schedule should be determined at this time.

DELTONA: 4 A) - C) No position

4D) The City of Deltona supports an implementation schedule where any and all changes within the areas 904, 407, and 321 and the rest of Volusia County are implemented at the same time.

MCI WORLDCOM: Each relief plan should be implemented as stated in the industry recommendation. These implementation schedules should be prioritized by exhaust dates, but in no event should the implementation schedule be set in a manner where the NPA would be exhausted before the relief plan is fully implemented. The start of the area code relief implementation schedule may be postponed if there is a credible, reliable information that the Commission's conservation measures are proving successful, but in such case the new schedule would use the same implementation schedule beginning only at a later date. Any such later start dates would require

additional industry and Commission input, planning, and coordination.

NORTHEAST: 4 A)-C) - Northeast is not a party in the 305, 561 and 954 cases, so it has no position.

4 D) - Once the FPSC approves the recommended relief plan, NANPA can assign the new NPA within 14 days. The transitional dialing period, which permits customers to dial service on ten digits, should begin 90 days after the NPA is assigned and should continue for 180 days.

NANPA: Takes no position on the issue.

OMNIPOINT: No position.

SPRINT: The Commission should establish an implementation schedule consistent with the overlay ordered in Docket No. 980671-TL (407 NPA) or the geographic split ordered in Docket No. 990223-TL (941 NPA).

VOLUSIA: No position.

STAFF ANALYSIS: Issue 4 addresses the appropriate implementation schedule for the 305/786, 561, 954, and 904 NPA relief plans, consistent with staff's recommendations in Issues 1 and 2.

FCC Rule 47 C.F.R. §52.9(a)(1) states that any NPA relief plan must be implemented in a manner that ". . . facilitate[s] entry into the telecommunications marketplace by making telecommunications numbering resources available on an efficient, timely basis to telecommunications carriers . . ." (EXH 1) NANPA witness Foley testifies that:

> the industry recommended interval schedule for an overlay calls for NANPA to assign the relief NPA within 14 days of the release of a final order by the Commission. Transitional dialing would begin 90 days later and mandatory dialing would begin 180 days after the commencement of the transitional dialing period. (TR 34)

In prior NPA relief proceedings such as in Docket No. 980671-TL and 990233-TL, the Commission has instituted a permissive

dialing period of approximately 8-9 months. (EXH 1) Section 10 of the NPA Code Relief Planning and Notification Guidelines (NPA Guidelines) provides that the permissive dialing period should allow sufficient time for customers to:

- revise printed materials,
- reprogram equipment that stores and analyses telephone numbers,
- update directory listings,
- notify customers and business associates, and
- change advertising. (EXH 1)

Staff also believes the Commission should order the affected LECs to send a letter to alarm monitoring companies advising them of the probable need to reprogram their equipment, on or before the mandatory dialing period in each NPA, as this became a legitimate concern which required Commission action in the recent 407 NPA relief, Docket No. 980671-TL. (EXH 1) The letter should be submitted to Commission staff for review in an expeditious manner so as to ensure that the reprogramming activities can be completed within the respective permissive dialing period.

BellSouth witness Greer testifies that the Commission has traditionally provided 12 months of permissive dialing for splits, and approximately six months of permissive dialing for overlays. (EXH-8) He asserts that the Commission has generally made efforts to give customers more time to make changes that are necessary for a smooth transition. (EXH-8) However, witness Greer testifies that there are limitations on how many NPAs can be converted at any given time, and recommends that the Commission coordinate the establishment of permissive and mandatory dialing periods with the industry. (TR 187) Witness Baeza, also for BellSouth, asserts that the Commission should stagger the NPA implementation dates so as to ensure each NPA is implemented smoothly. (TR 154) Staff agrees.

A. 305/786 NPA

Based on the projected exhaust in the December, 1999 COCUS survey, staff believes that the most critical relief need is to provide relief for the 305/786 NPA and, therefore, staff recommends that permissive dialing begin in the 305 NPA (Keys region) on Monday, November 6, 2000, with mandatory dialing to begin approximately nine months later, on Monday, August 6, 2001. (EXH 4)

Staff's recommended area code relief plan, Alternative #12, does not require any number change whatsoever for any subscribers,

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but does require a dialing pattern change for the citizens of the Keys region. For the citizens in the remaining portion of the 305/786 NPA (the Miami-Dade mainland), a dialing pattern change is not required, as their area had previously implemented 10-digit dialing in Docket No. 971058-TL. (EXH 1) The permissive dialing window is not significant for the Miami-Dade mainland subscribers, but is for the citizens of the Keys, as subscribers need a period of time to become accustomed to their "new" dialing pattern because customers in the Miami-Dade area currently have a 10-digit local calling pattern. Business, residential, and all other subscribers may also need to update their printed material or advertising to reflect their current NPA, as the full 10-digit identity will become necessary. (EXH 1; EXH 8)

In conclusion, staff believes there must be a balance between subscriber considerations and the rather urgent need for area code relief in the Keys region. (EXH 1) While we generally would prefer a longer permissive dialing period, the need for immediate relief is our basis for recommending a nine-month permissive dialing period, beginning on Monday, November 6, 2000, with mandatory dialing to begin on Monday, August 6, 2001, based upon the Commission's prior numbering relief orders in Docket No. 980671-TL and 990223-TL. (EXH 1)

B - D) 561, 954, and 904 NPAs

Staff recommends the relief plan implementation schedules for the ~~561, 954, and~~ 904 NPAs as provided in Table 4-1.

AREA CODE	PERMISSIVE DIALING PERIOD BEGINS	MANDATORY DIALING PERIOD BEGINS
~~561~~	~~June 4, 2001~~	~~June 3, 2002~~
~~954~~	~~March 5, 2001~~	~~March 11, 2002~~
904	January 15, 2001	November 5, 2001

Table 4-1: Area Code relief implementation schedule for the 904 NPAs that may be affected by number pooling trials or other number conservation measures.

The permissive dialing window for the subscribers in the ~~561, 954, and~~ 904 NPAs - whether one year or longer - becomes

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significant, as this time frame represents ~~their~~ the period of time to modify ~~their~~ the dialing patterns in that area, as necessary, as demonstrated in the past area code relief orders. (EXH 1) If the number pooling trials and other number conservation measures described and discussed in Issue 2 of this recommendation forestall the exhaustion of the current NPA, the implementation time frame for a new NPA could be extended. (EXH 1) In that case, the permissive dialing period could be extended beyond the time frame illustrated in Table 1, with the mandatory dialing period as well to a later date.

Currently, the 954 and 561 area codes are projected to exhaust on October 1, 2002. (EXH 1) Pooling trials have been mandated within the 954 and 561 area codes. These pooling trials are scheduled to begin on January 22, 2001, and February 5, 2001 for the 954 and 561 area codes, respectively. (EXH 1) Since there is ample time to assess the impact of number pooling on numbering resources, staff believes the implementation of area code relief should be withheld until the impact of number pooling can be determined. Staff believes it would be premature to implement area code relief, because number pooling may result in extending the lives of these two area codes. (EXH 1) Once the industry determines the impact of the implementation of number conservation measures upon the projected exhaust date of the 954 and 561 area codes, a joint notice should be filed with the Commission. Staff believes that based on the projected exhaust date, the industry should specify the appropriate permissive and mandatory dialing periods.

Staff does not recommend withholding implementation of area code relief for the 904 NPA. While pooling has been mandated within the 904 NPA, that pooling trial is not scheduled to begin until April 2, 2001. (EXH 1) Because the exhaust date for the 904 NPA is expected to occur on January 1, 2002, there would be insufficient time to evaluate the impact of pooling, and providing ample time for permissive dialing. Thus, staff recommends that the area code relief plan be implemented with the permissive dialing period beginning on January 15, 2001, and the mandatory dialing period beginning on November 5, 2001.

Staff also does not recommend withholding implementation of area code relief for the 305 and 305/786 area codes. As pooling trials have not been mandated in these areas, staff does not believe the other number conservation measures, alone, would appreciably extend the life of the area code.

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Conclusion:

Upon approval of Issue 1 of this recommendation, staff recommends that the Commission approve the relief plan implementation schedule for the 305/786~~, 561, 954,~~ and 904 NPAs, as shown in the following table:

AREA CODE	PERMISSIVE DIALING PERIOD BEGINS	MANDATORY DIALING PERIOD BEGINS
305/786	November 6, 2000	August 6, 2001
~~561~~	~~June 4, 2001~~	~~June 3, 2002~~
~~954~~	~~March 5, 2001~~	~~March 11, 2002~~
904	January 15, 2001	November 5, 2001

Staff also recommends that the Commission order that the affected LECs jointly file a notice: (1) to inform the Commission of the outcome of various number conservation measures, and (2) to recommend the permissive and mandatory dialing periods for the 561 and 954 NPAs. This notice should be submitted to the Commission no later than October 1, 2001. Staff will file a recommendation for final Commission approval of the implementation dates filed in the notice.

Additionally, the Commission should also order the affected LECs to send a letter to alarm monitoring companies advising them of the need to reprogram their equipment as necessary 9 months before the mandatory dialing period in each NPA. ~~However, if the number pooling trials and number conservation measures forestall the exhaustion of the current 561, 954, and 904 NPAs, then the applicable time frames may be subject to modification in a future proposed agency recommendation when the impact of the conservation measures can be evaluated.~~ Notwithstanding that, staff recommends the overall implementation schedule reflected above is appropriate at this time.

ISSUE 5: Should these dockets be closed?

RECOMMENDATION: No, staff recommends that these dockets should remain open pending the implementation of the relief plans and additional number conservation measures in accordance with the time frames discussed in Issues 2 and 4. (B. KEATING, VACCARO, FORDHAM)

STAFF ANALYSIS: Staff recommends that these dockets should remain open pending the implementation of the relief plans and additional number conservation measures in accordance with the time frames discussed in Issues 2 and 4

ATTACHMENT 1

The Industry Numbering Committee Guidelines provide definitions on various area code relief methods. A summary of these guidelines is as follows:

NPA Split Method

By this method, the exhausting NPA is split into two or more geographic areas leaving the existing NPA code to serve, for example, an area with the greatest number of customers (in order to minimize number changes) and assigning a new NPA code to the remaining area, pursuant to INC Guidelines. (EXH 1) This method divides areas by jurisdictional, natural or physical boundaries (counties, cities, river, etc.) between the old and new NPAs. (EXH 1)

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

Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state, that has spare NXX code capacity, pursuant to INC Guidelines. (EXH 1) A boundary shift occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. (EXH 1) As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change. This method applies to multi-NPA states only. It could provide for a better balance of central office (NXX) code utilization in the affected NPAs. This method is viewed as an interim measure because it tends to provide shorter term relief as compared to implementing a new NPA code, pursuant to INC Guidelines. (EXH 1)

Overlay Method

An NPA overlay occurs when more than one NPA code serves the same geographic area, pursuant to INC Guidelines. (EXH 1) In an NPA overlay, code relief is provided by opening up a new NPA code within the same geographic area as the NPA(s) requiring relief.

(EXH 1) Numbers from this new NPA are assigned to new growth on a carrier-neutral basis, i.e., first come, first served. Since the overlay relief method could result in unequal dialing for those customers served out of the overlay NPA, the FCC[28] requires 10-digit dialing for all of the affected customers' local calls within and between the old and new NPAs in order to ensure that competitors, including small entities, are not competitively disadvantaged. (EXH 1) In addition to requiring 10-digit dialing for all local calls, the FCC requires that every carrier authorized to provide telephone service in the affected area code have the ability to be assigned at least one NXX in the existing area code during the 90-day period preceding the introduction of the overlay.

The overlay method reduces or eliminates the need for customer number changes like those required under the split and realignment methods. (EXH 1) It also provides the option of eliminating the permissive dialing period as part of implementation. However, this method will necessitate 10-digit dialing of local calls between the old and new NPAs as central office (NXX) codes are implemented in the new NPA. Four potential implementation strategies have been identified for an NPA overlay. They are:

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

b) Concentrated Growth Overlay - A concentrated growth overlay may be considered in situations when the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new phone numbers in that section would be assigned from the new NPA. As more relief is required, the geographic area served by multiple NPAs could expand.

c) Boundary Extension Overlay - With a boundary extension overlay, the NPA requiring relief is adjacent to an NPA with spare

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[28]Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, FCC Order No. 96-333, ¶283, Second Report and Order and Memorandum Opinion and Order, 11 FCC Rcd 19392 (1996)

capacity. The boundary between these two NPAs is eliminated, and spare NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary extension might be in a state consisting of two NPAs, where one NPA has spare capacity. This solution has the advantage of not requiring a new NPA code, but it also has the same limitation as a boundary realignment in that it provides less long term relief.

d) Multiple Overlay - The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief, i.e., a split or a distributed overlay. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state where more than one NPA exists.

Other

A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlay as demand requires. Other combinations of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations and community needs and requirements. Therefore, in this proceeding, staff witness Fulwood introduced the following concepts in Exhibit 7:

- **Spotted Overlay:** An overlay occurs in various segments with in an area. All local calls within the overlay area are made by dialing the area code and the 7-digit telephone number, a total of 10 digits. All surrounding areas dial 7 digits. Across the boundary, all calls are 10 digits.

- **Expanded Split:** The area code of a region is changed and replaced by extending an existing surrounding area code over this area. All Central Office Codes (COCs or NXXs) are used in the originating area.

- **Expanded Overlay:** The area code of a region is overlaid by an existing overlay area. Customers do not change area codes

except that new customers and business get the new area code and all local calls are made using 10 digits.

In prior area code orders (Docket No. 990223-TL and 980671-TL), the Commission identified several advantages and disadvantages of geographic split and overlay relief plans as follows:

Advantages of Overlay Plan

1. Customers in the overlay area can retain their telephone numbers.

2. Customers are not required to change advertisements containing the old area code telephone numbers.

3. Cellular carriers are not required to reprogram their customers' cellular telephones.

4. Costs to customers and carriers are minimized.

5. This method is the best and simplest migration path to future NPA relief by assuring the elimination of number changes and confusion.

6. This method is easy to implement from the telecommunications network perspective.

Disadvantages of Overlay Plan

1. 10-digit dialing is required for all local calls within the overlay area.

2. Directories and Directory Assistance will be required to provide 10-digit numbers.

3. All advertisements that contain 7-digit telephone numbers must be changed to 10-digit numbers.

4. Alarm monitoring companies will be required to reprogram their equipment to comply with the 10-digit dialing requirement.

Advantages of Geographic Split

1. 7-digit dialing would remain for intra-NPA local calls. (This may or may not include ECS calls depending on whether there is IXC competition)

Disadvantages of Geographic Split

1. Customers served by the new area code must change the area code portion of their telephone numbers.

2. Customers served by the new area code must change advertisements which included the 3-digit area code.

3. InterNPA EAS/ECS routes will require 10-digit dialing. (EXH 1)

Region A

305 and 786 NPAs

3.4 years

Alternative #1 (Expanded Overlay*)

* Recommended by the Industry

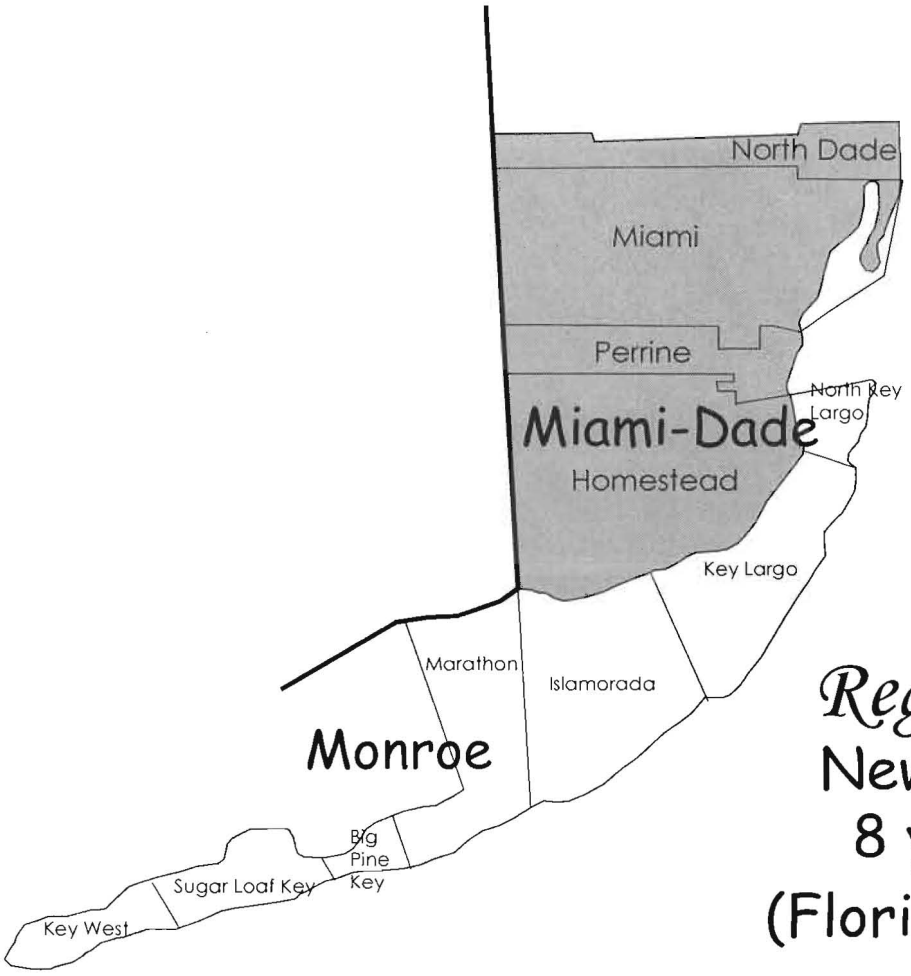
Region A

305, 786 and New NPA

7.8 years

Alternative #2

(Expanded Overlay)



Region A

305, 786 and New NPA

7.8 years

(Miami-Dade)

Region B

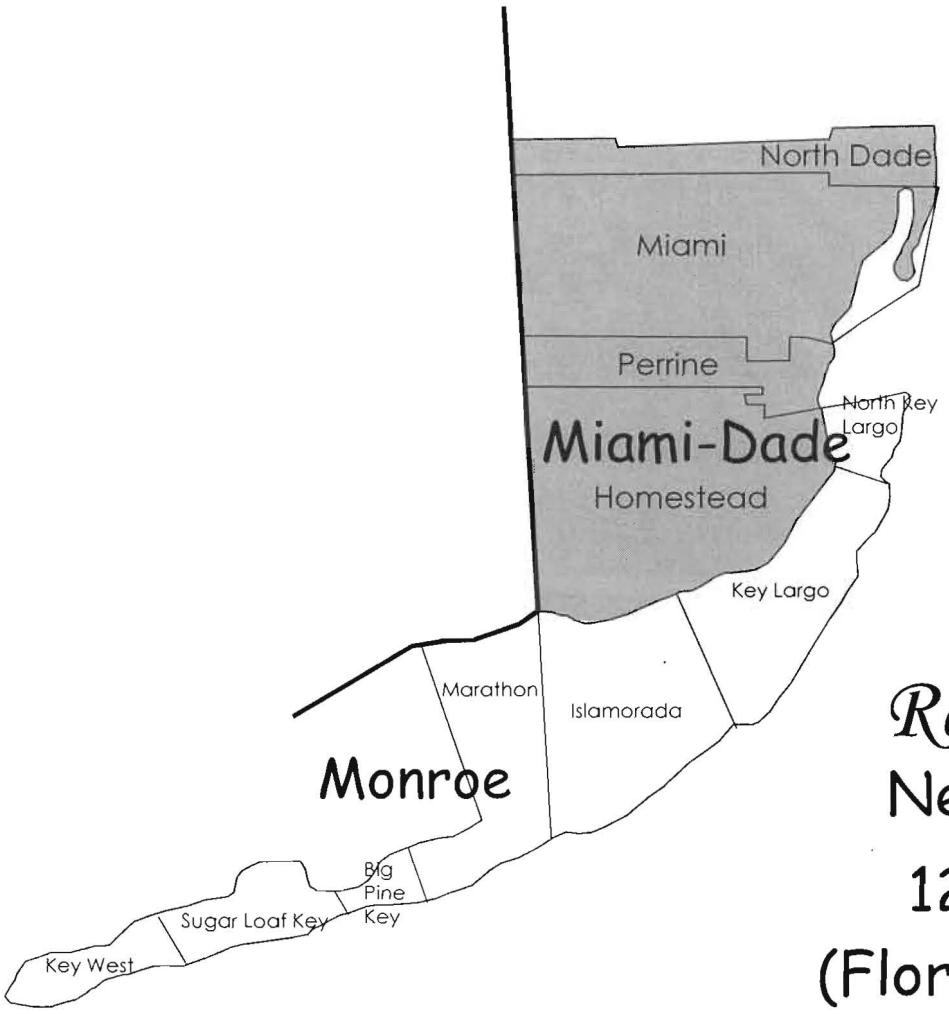
New NPA

8 years

(Florida Keys)

Alternative #3 (Split and Expanded Overlay)

Note: Only 225 NXXs in the new NPA will be reserved for the Keys



Region A

305, 786 & New NPA

7.3 years

(Miami-Dade)

Region B

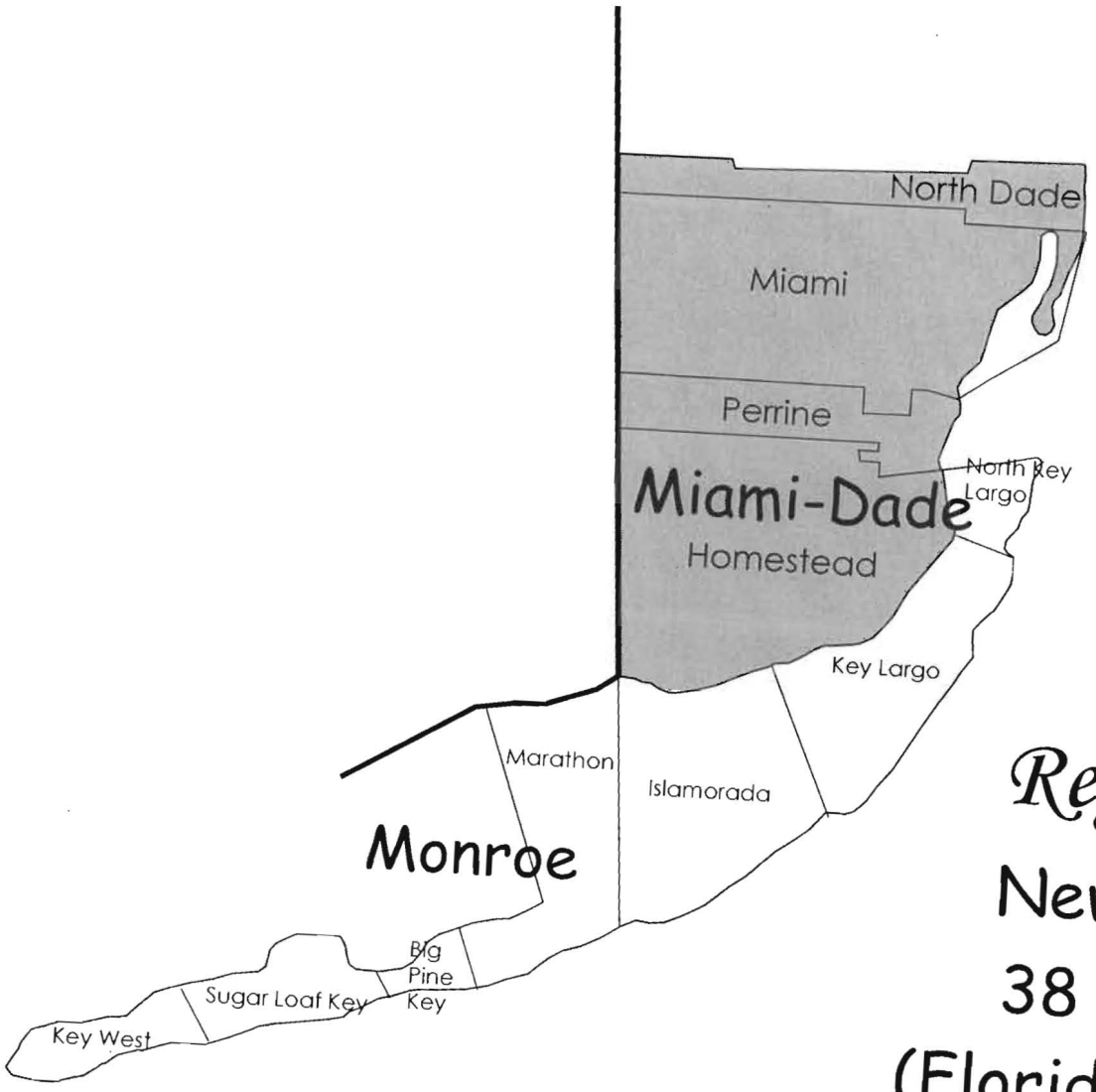
New NPA

12 years

(Florida Keys)

Alternative #4 (Split and Expanded Overlay)

Note: Only 297 NXXs in the new NPA will be reserved for the Keys



Region A

305 & 786

4.3 years

(Miami-Dade)

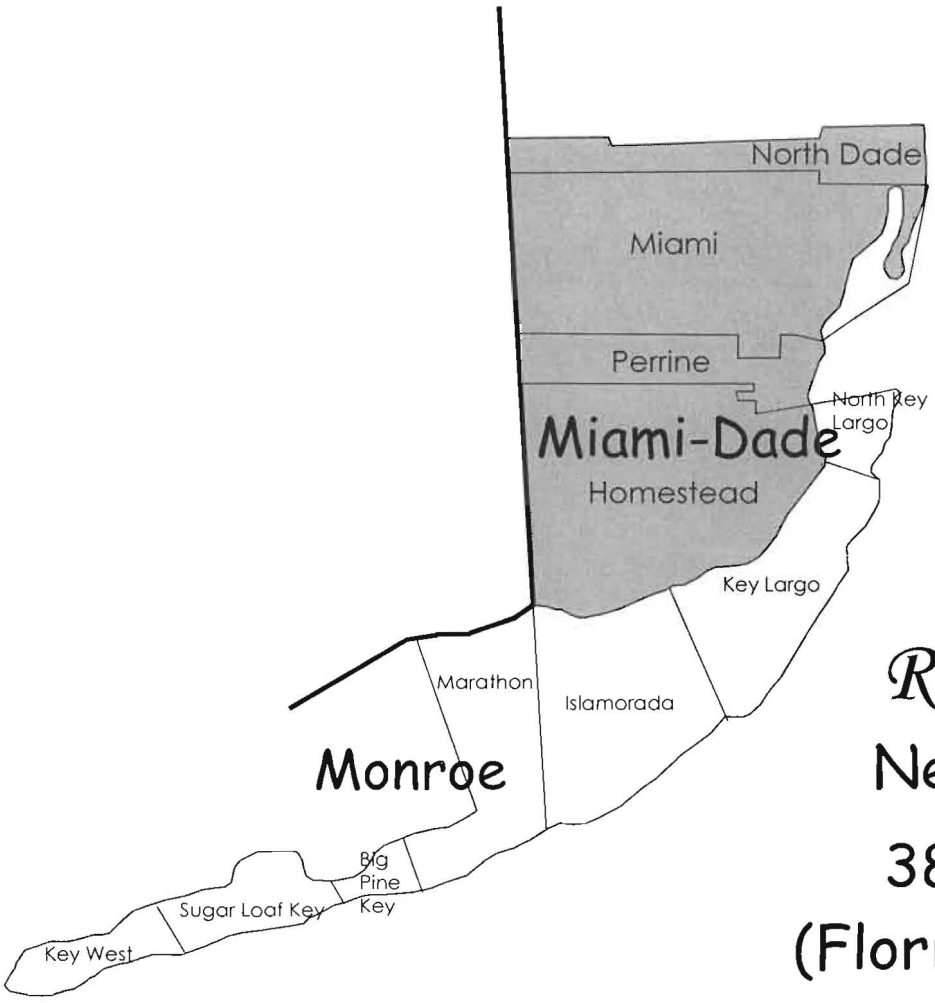
Region B

New NPA

38 years

(Florida Keys)

Alternative #5 (Split)



Region A

305, 786 & New NPA$_1$

9.3 years

(Miami-Dade)

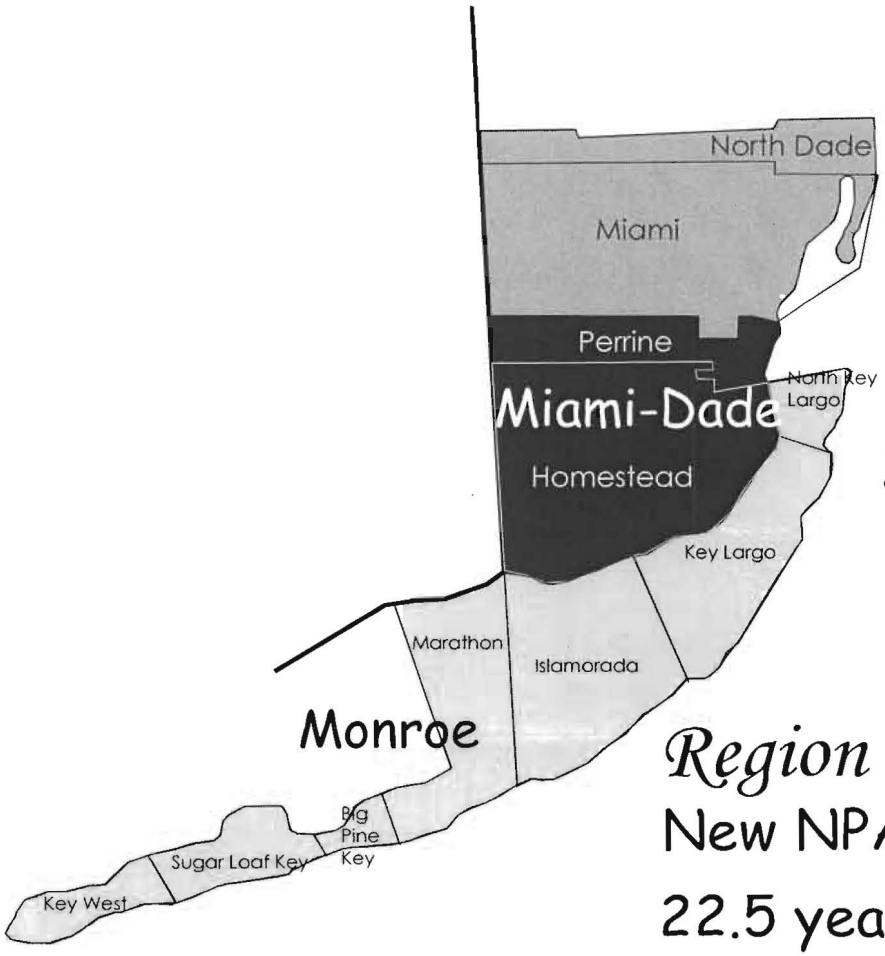
Region B

New NPA$_2$

38 years

(Florida Keys)

Alternative #6 (Split and Expanded Overlay)



Region A

305, 786 & New NPA_1

9.4 years

(North Dade and Miami Exchanges)

Region B

305, 786 & New NPA_2

23.2 years

(Perrine and Homestead Exchanges)

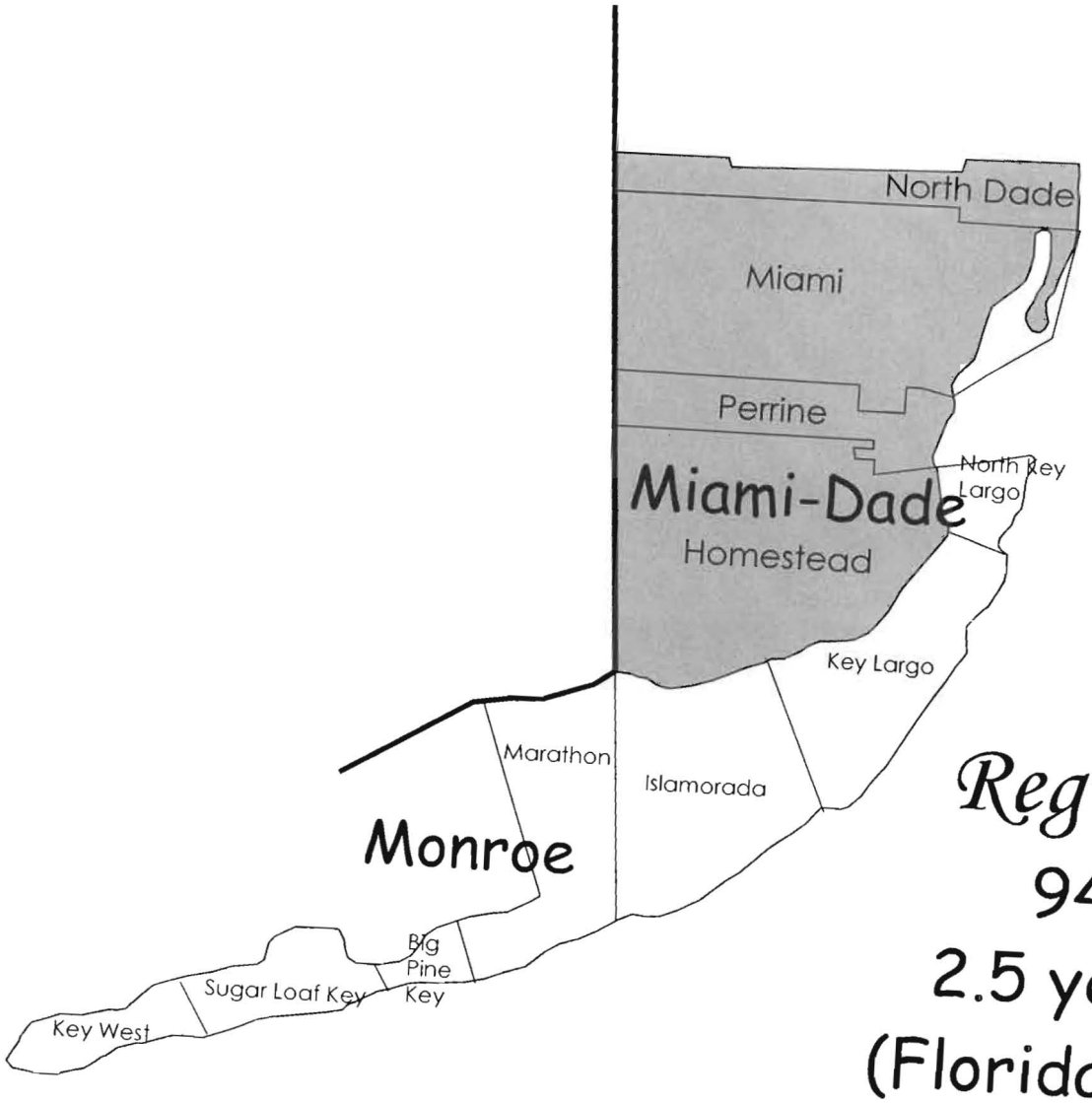
Region C

New NPA_2

22.5 years

(Florida Keys)

Alternative #7 (Split and Double Expanded Overlay)



Region A

305 & 786

4.3 years

(Miami-Dade)

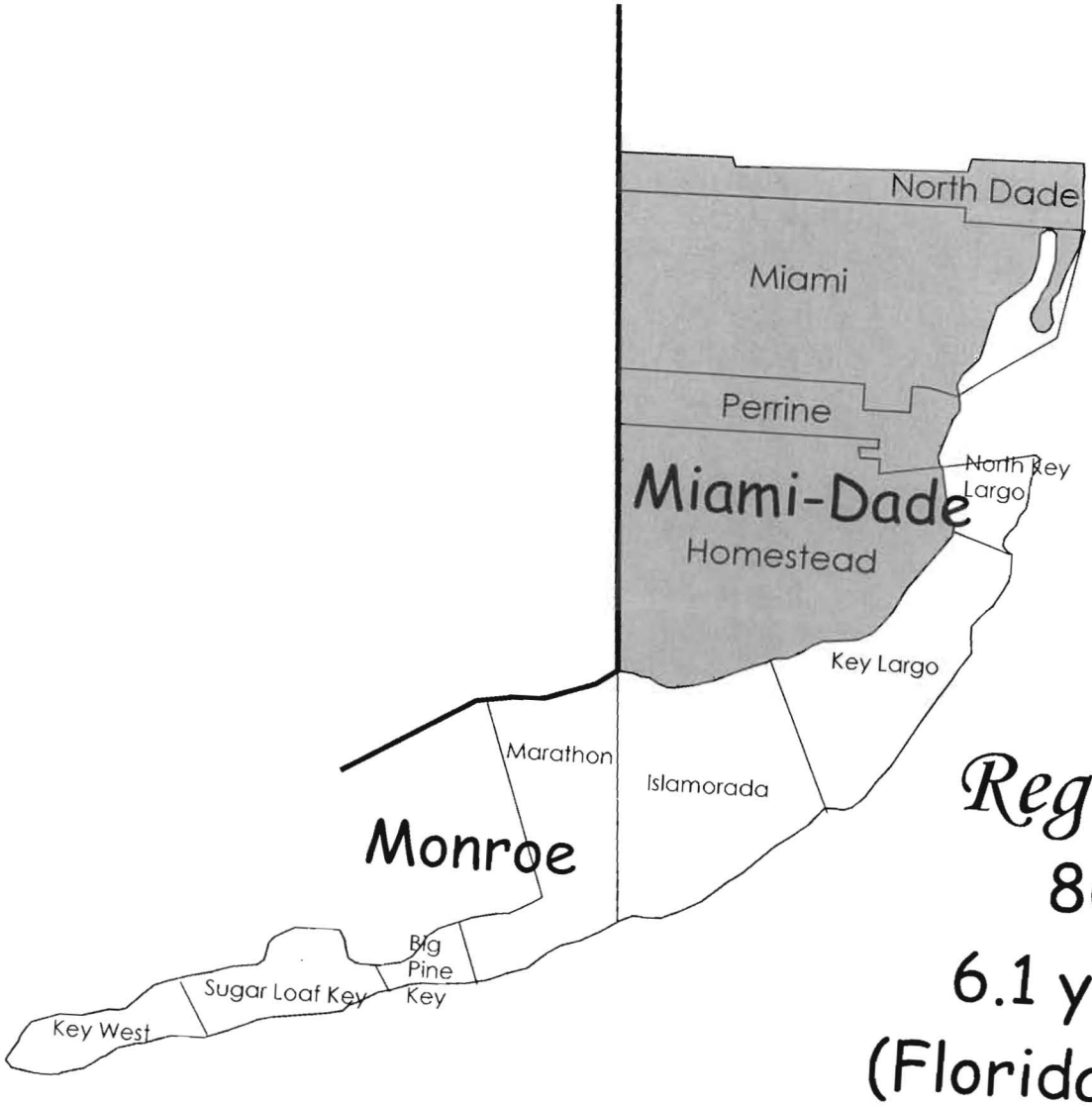
Region B

941

2.5 years

(Florida Keys)

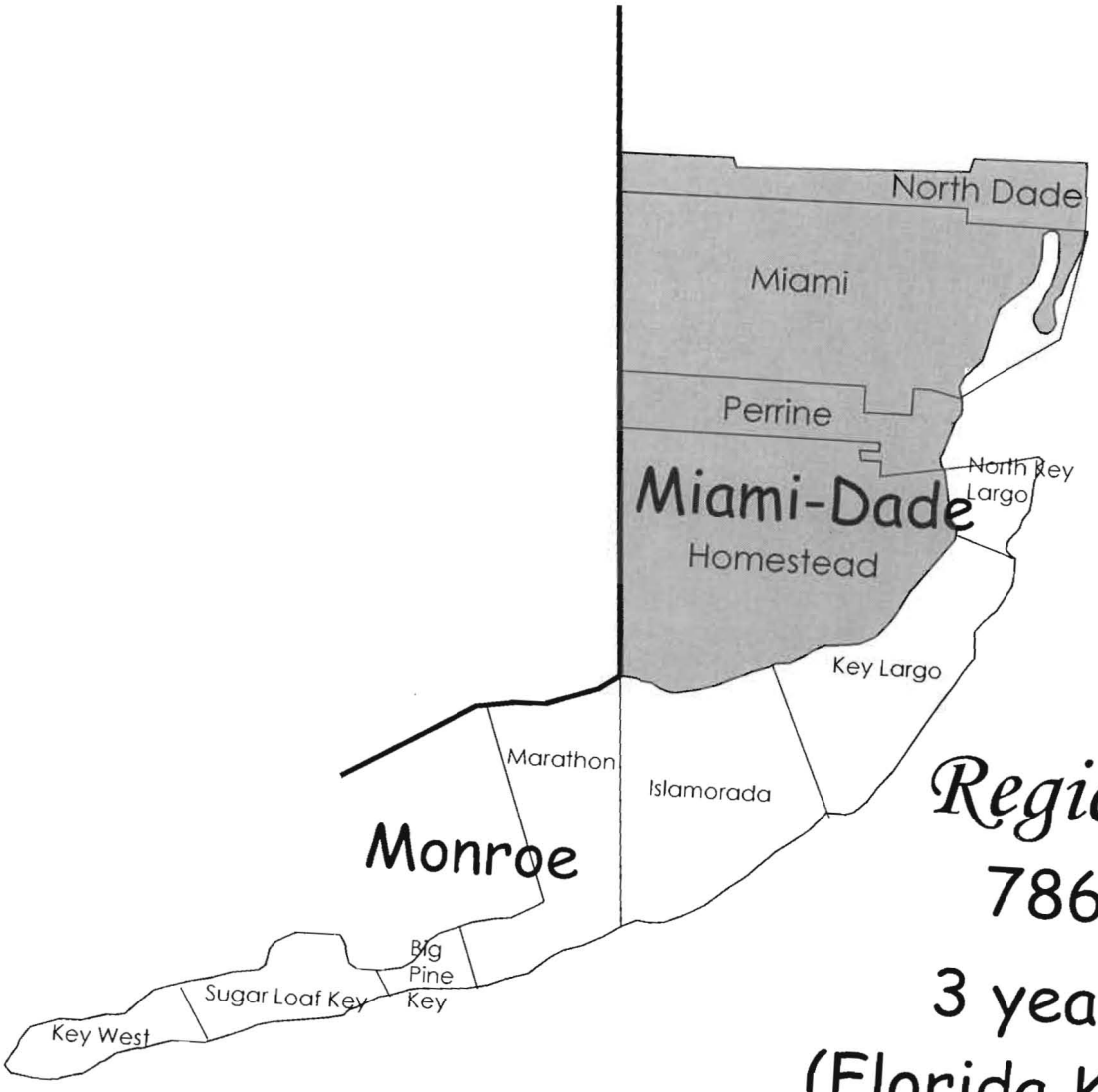
Alternative #8 (Expanded Split)



Region A
305 & 786
4.3 years
(Miami-Dade)

Region B
863
6.1 years
(Florida Keys)

Alternative #9 (Expanded Split)



Region A

305 & 786

3 years

(Miami-Dade)

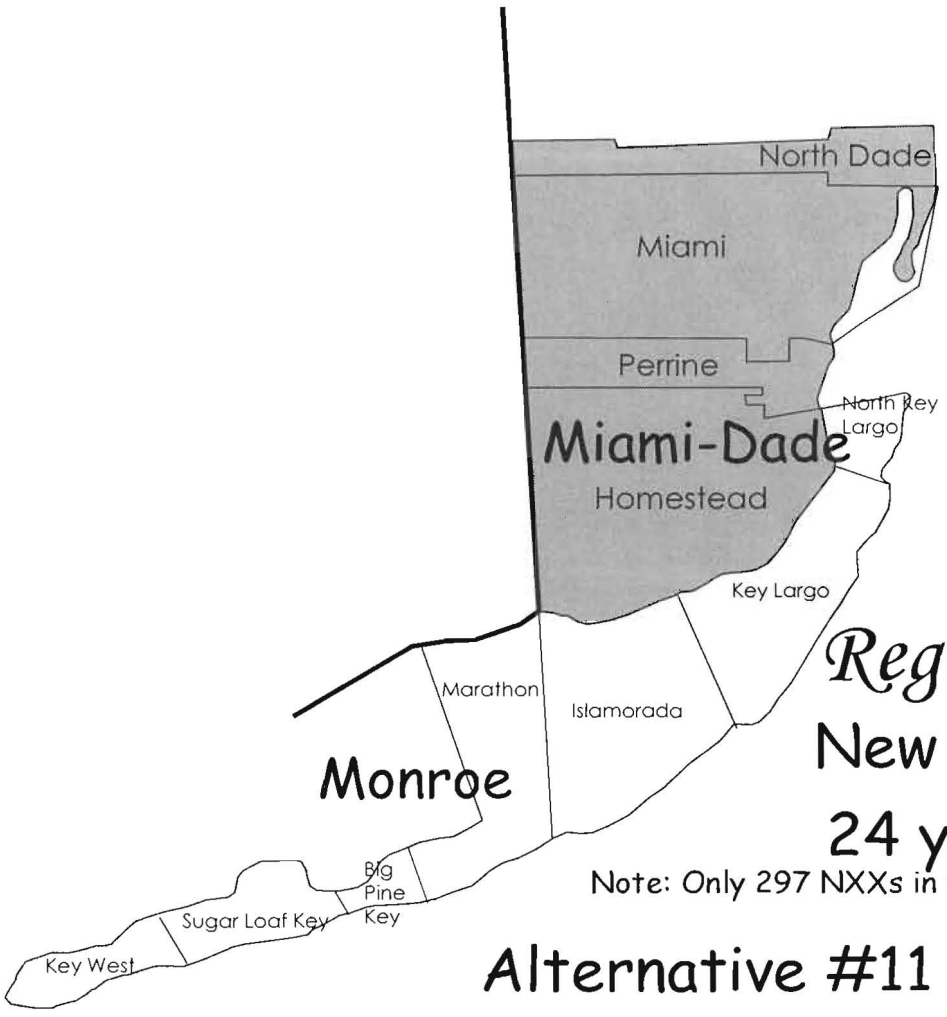
Region B

786

3 years

(Florida Keys)

Alternative #10 (Expanded Split)



Region A

305, 786 & New NPA

14.7 years

Region B

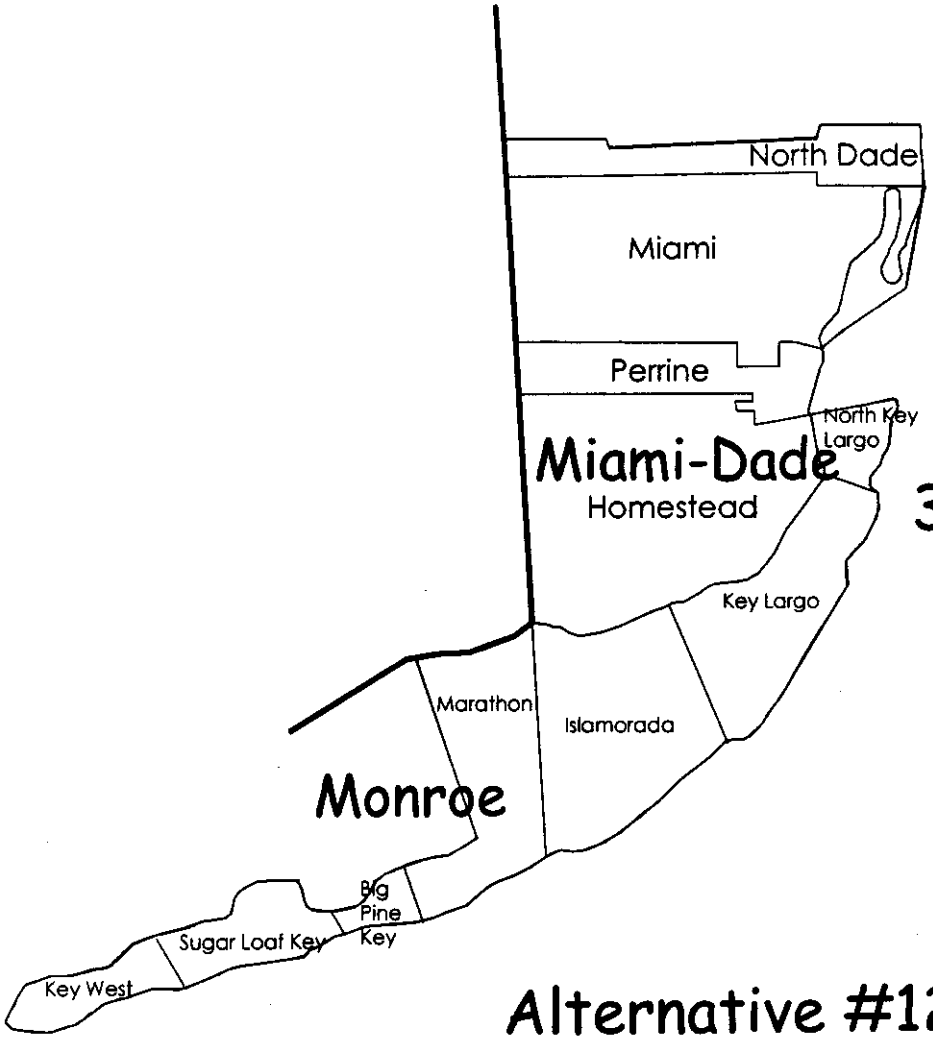
New NPA

24 years

Note: Only 297 NXXs in the new NPA will be reserved for the Keys

Alternative #11

Split and Expanded Overlay with Number Conservation Measures

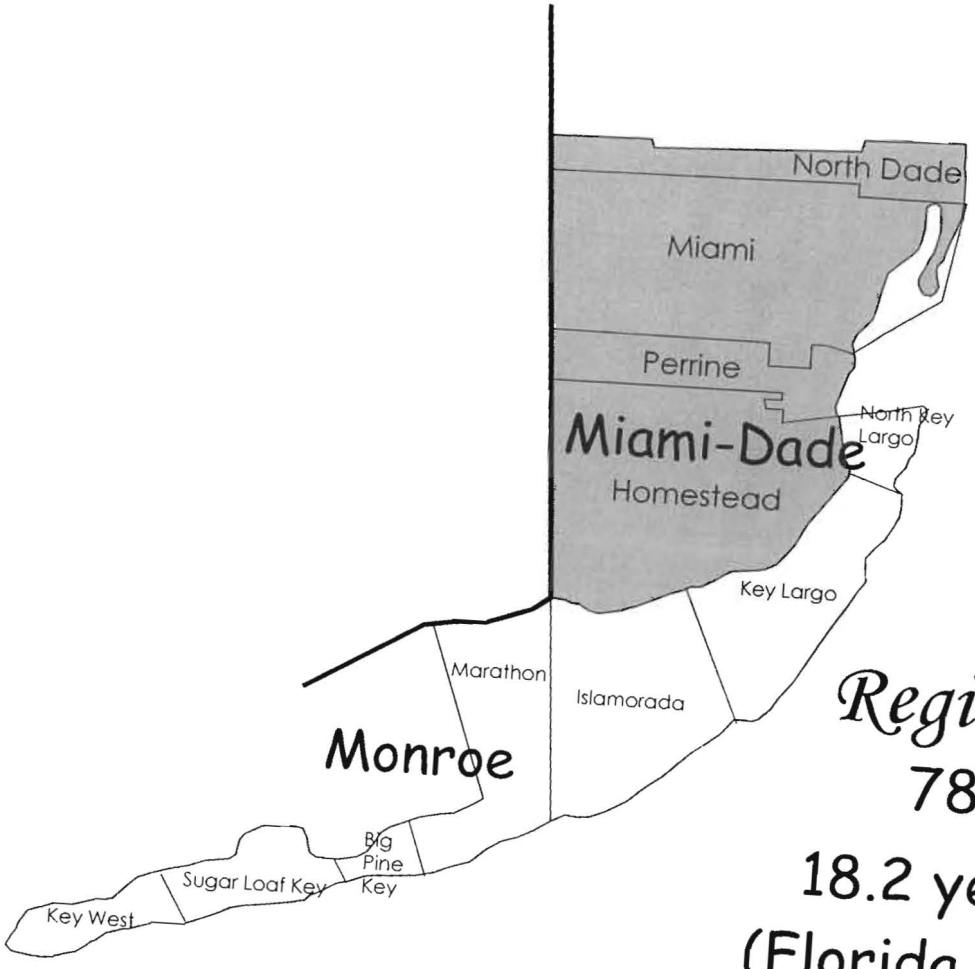


Region A

305, 786 and New NPA

15.6 years

Alternative #12
Expanded Overlay with
Number Conservation Measures



Region A

305, 786, & New NPA

5.3 years

(Miami-Dade)

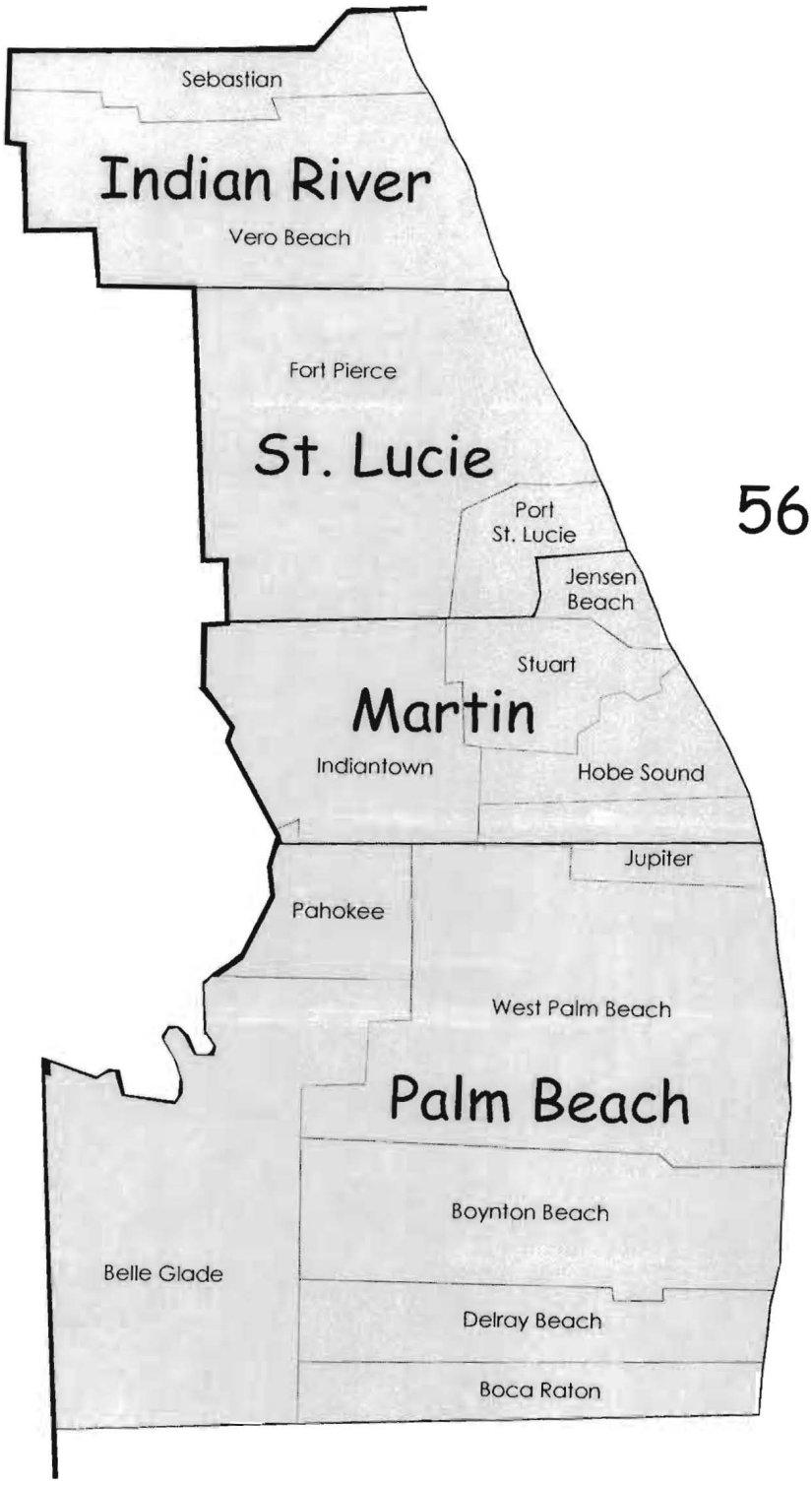
Region B

786

18.2 years

(Florida Keys)

Alternative #13 (Expanded Split)



Region A

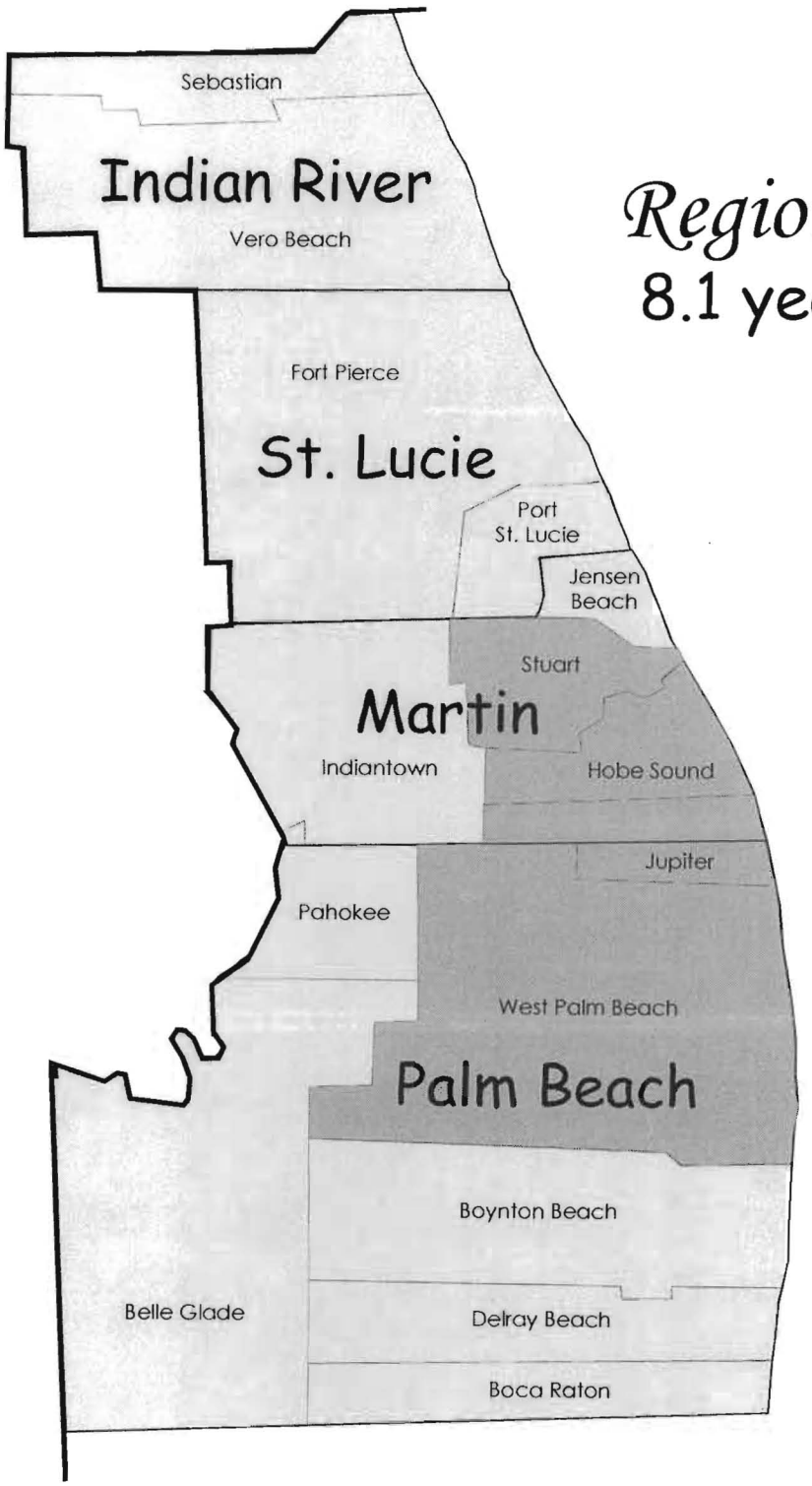
561 and New NPA

8.8 years

Alternative #1

Overlay*

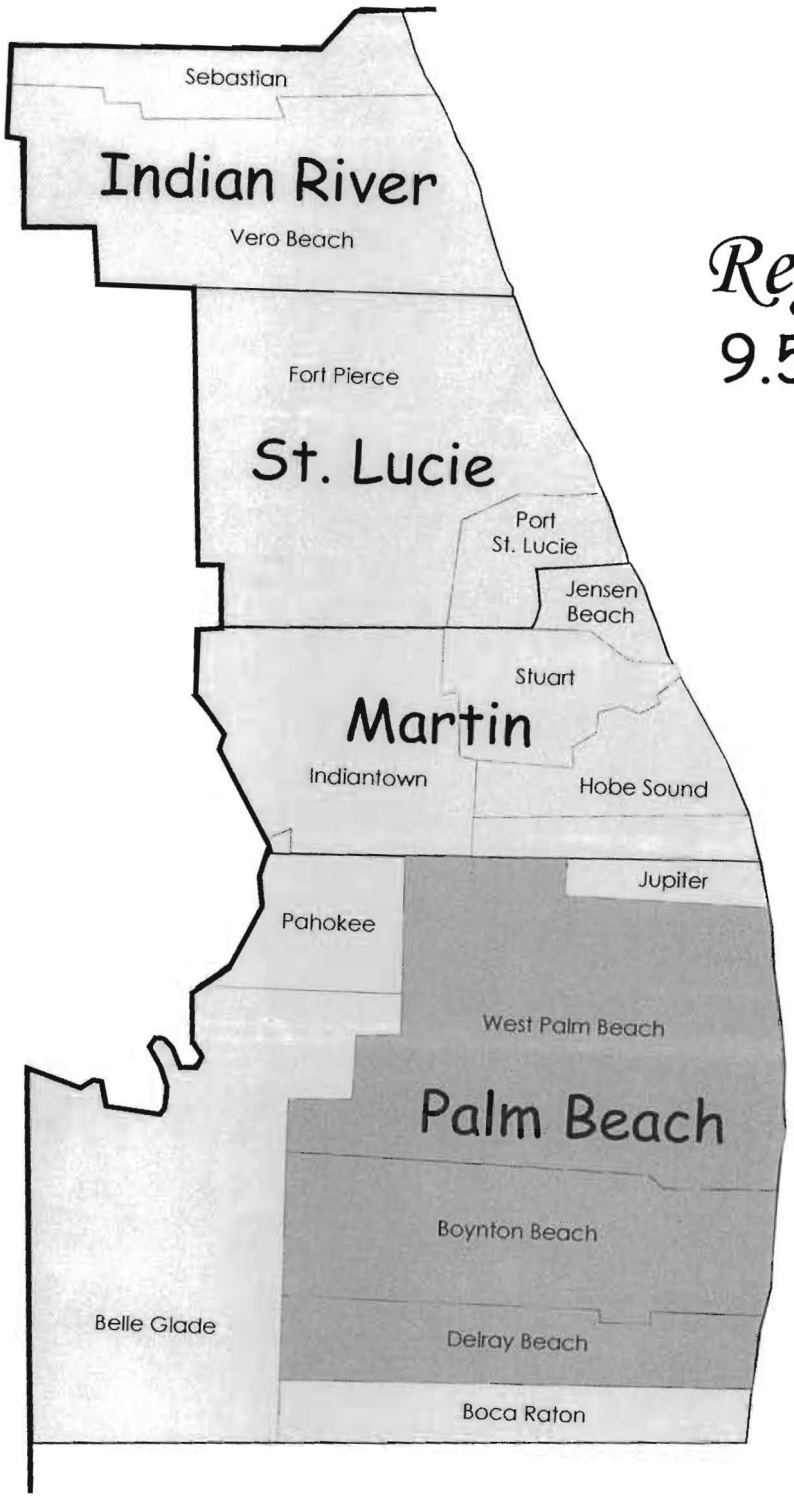
* Recommended by the Industry



Region A
8.1 years

Region B
9.5 years

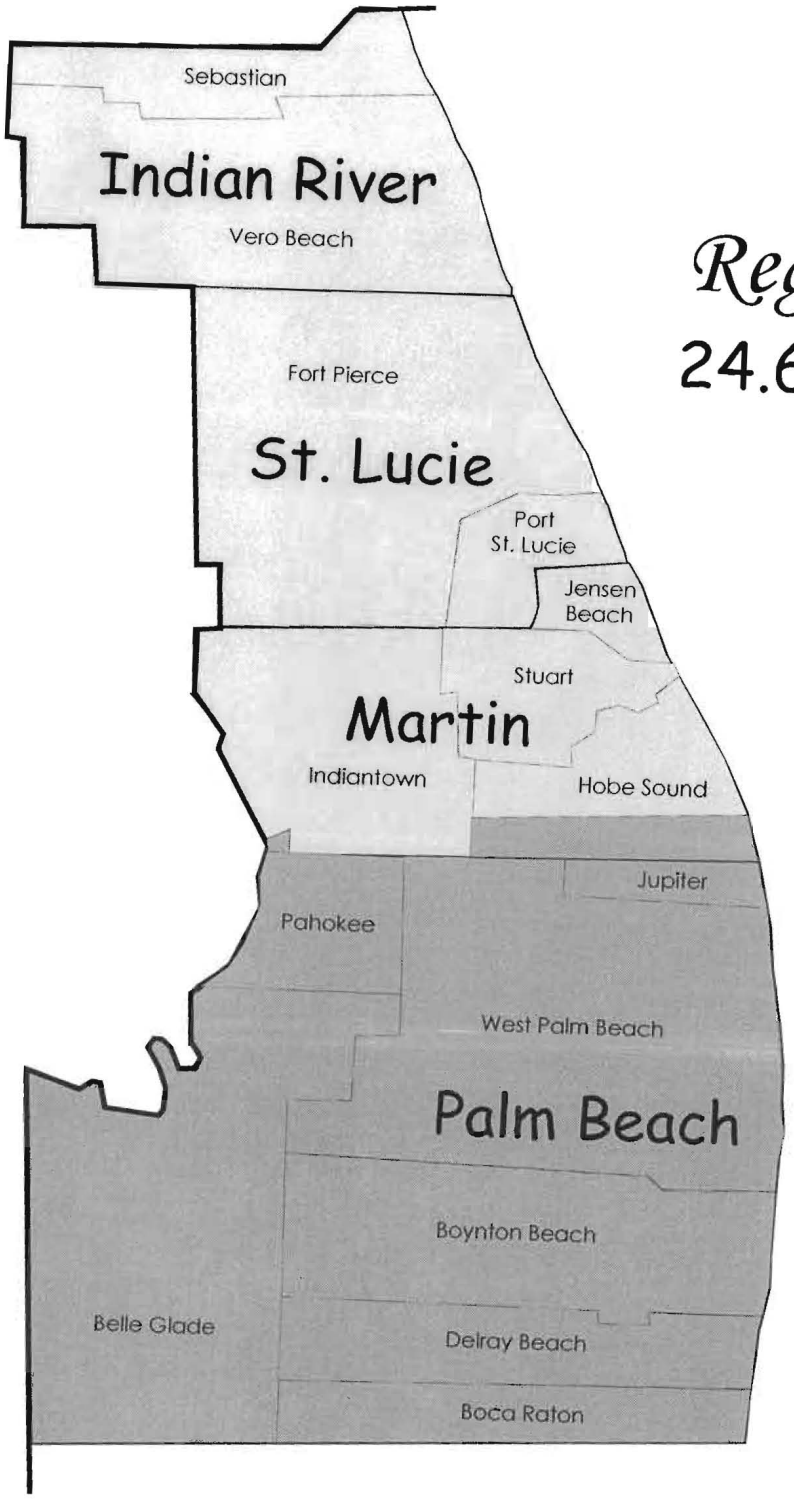
Alternative #2
Geographic Split



Region A
9.5 years

Region B
8.1 years

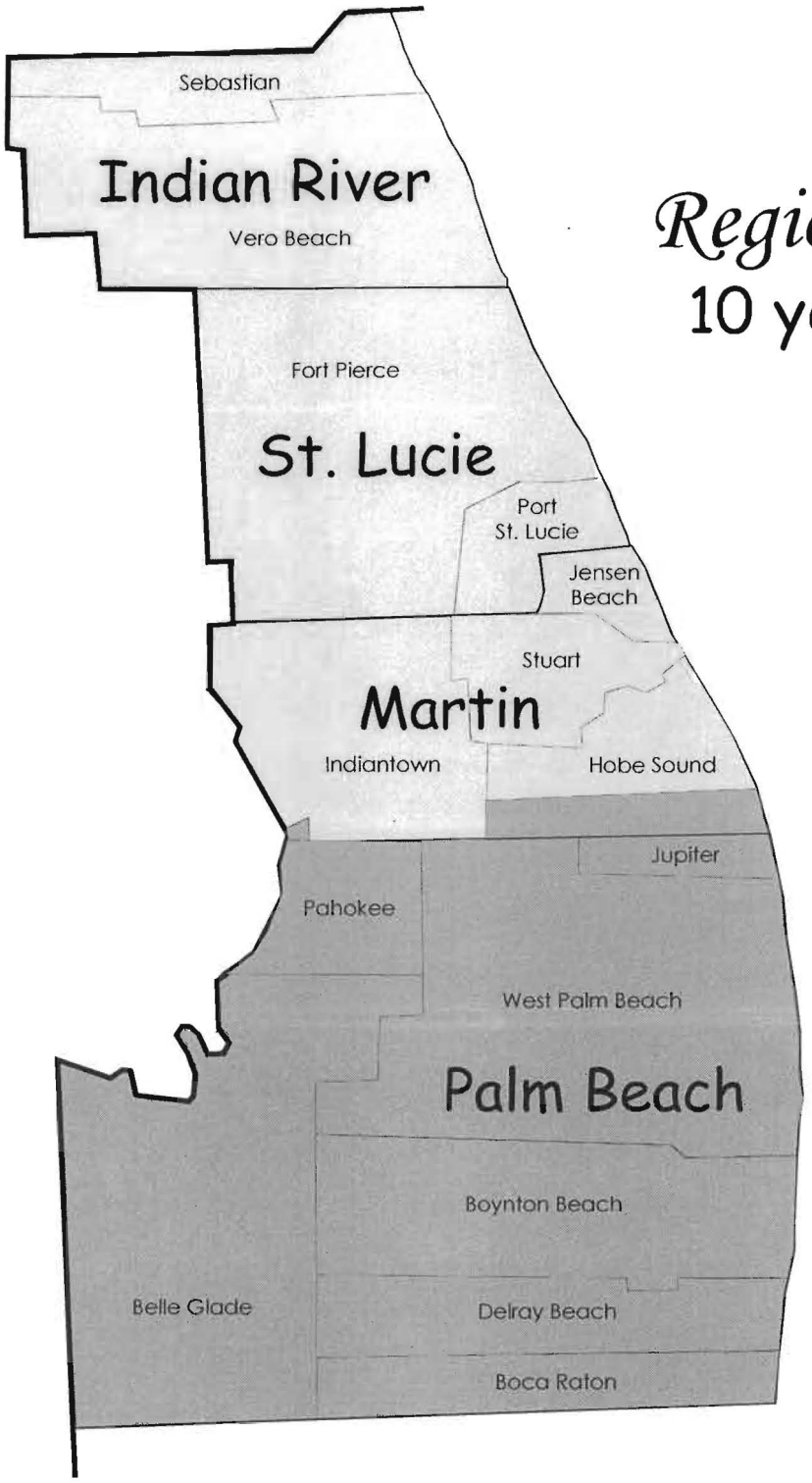
Alternative #3
Geographic Split



Region A
24.6 years

Region B
3.1 years

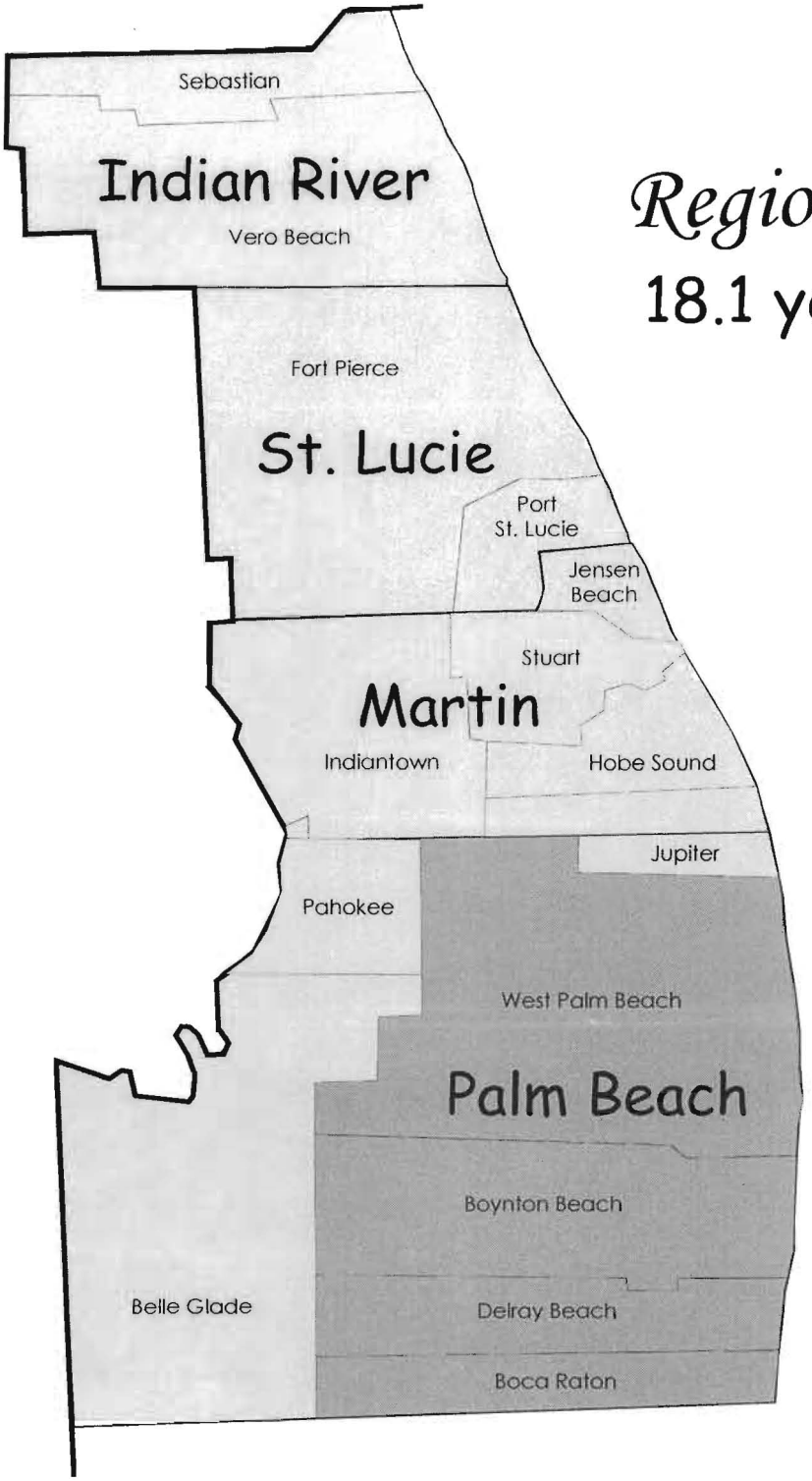
Alternative #4
Geographic Split



Region A
10 years

Region B
2 years

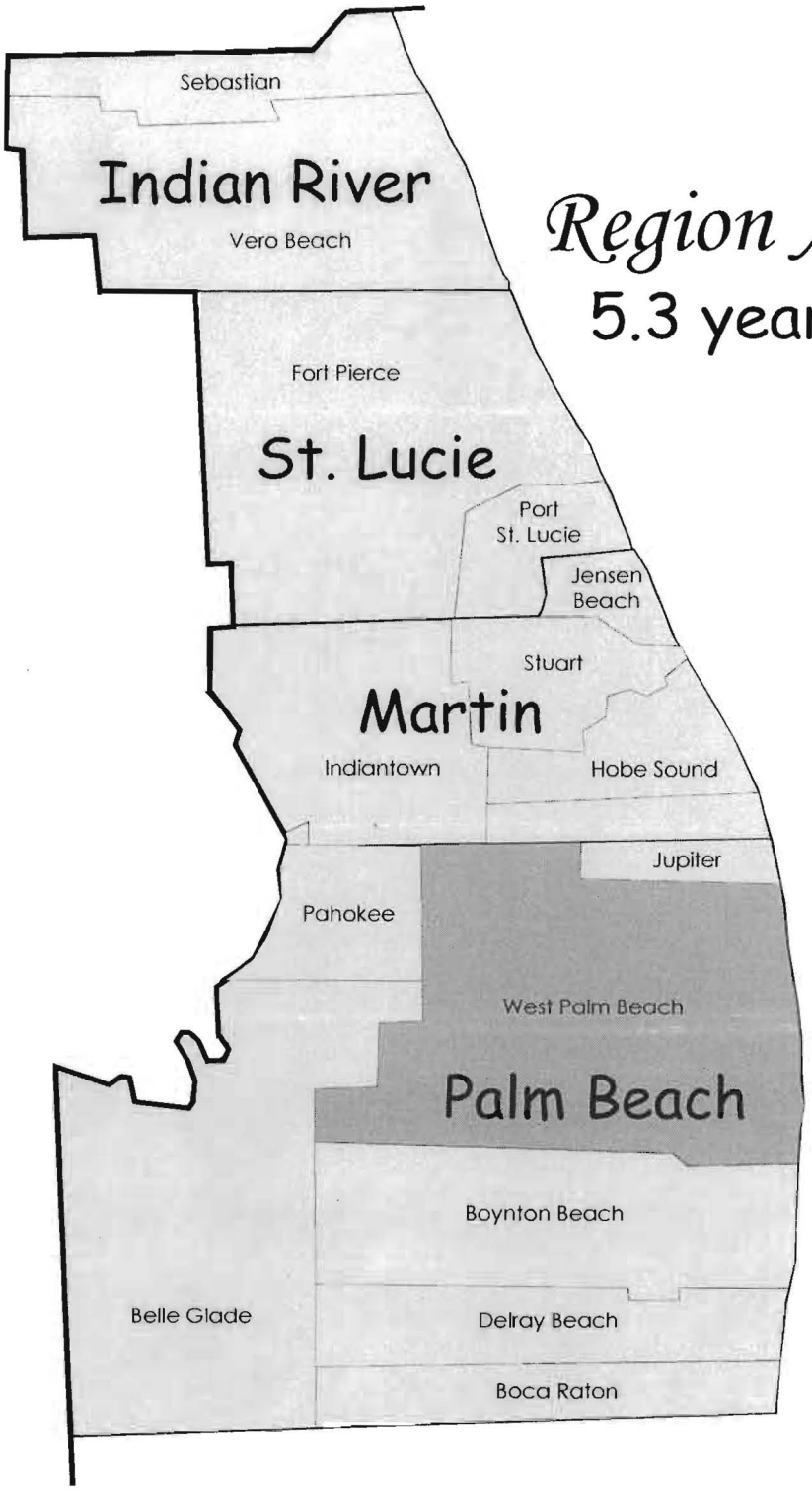
Alternative #5
Split and Concentrated Growth Overlay



Region A
18.1 years

Region B
(Overlay)
17.3 years

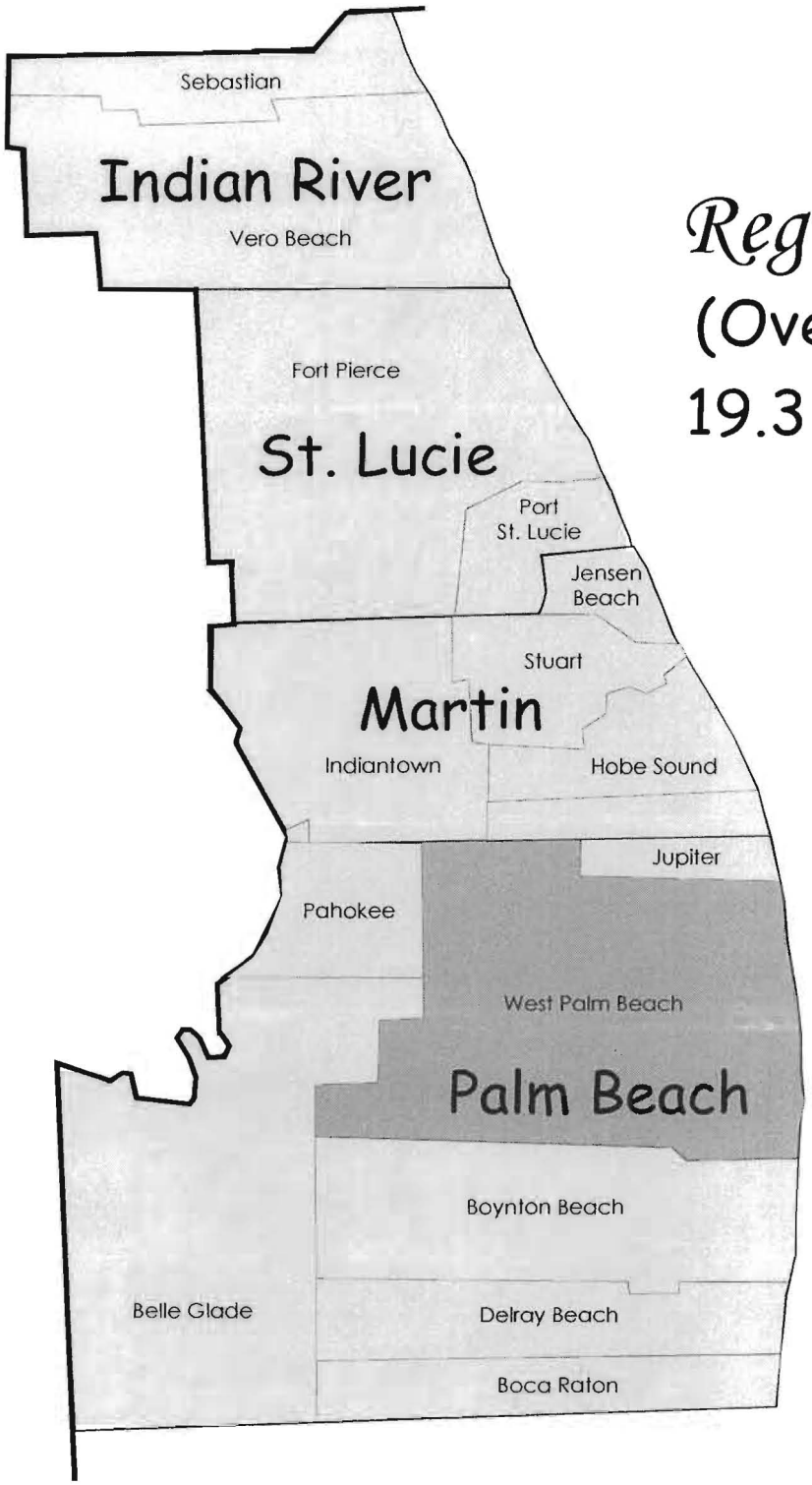
Alternative #6
Geographic Split and Overlay



Region A
5.3 years

Region B
14.7 years

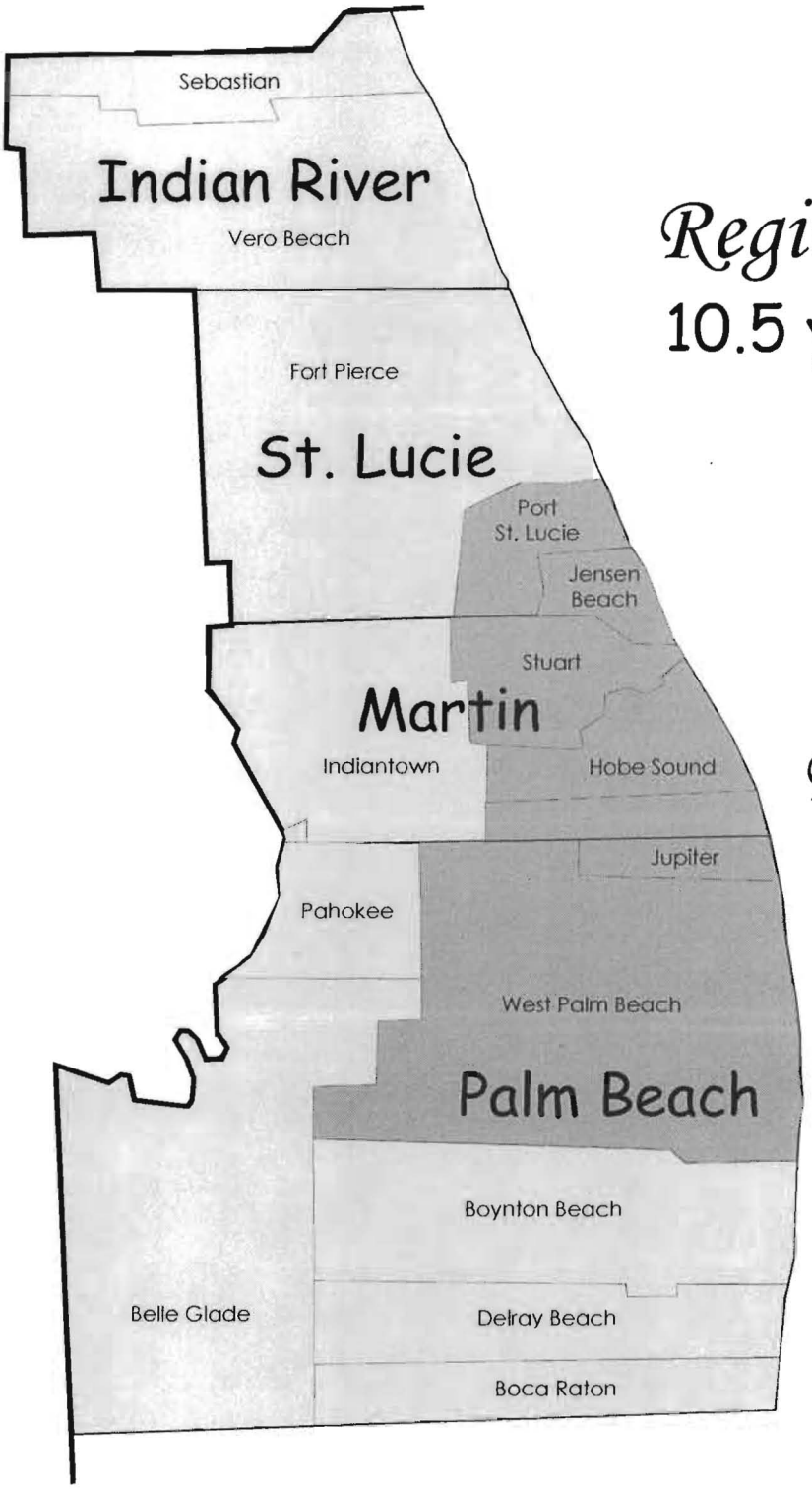
Alternative #7
Geographic Split



Region A
(Overlay)
19.3 years

Region B
14.7 years

Alternative #8
Geographic Split and Overlay



Region A

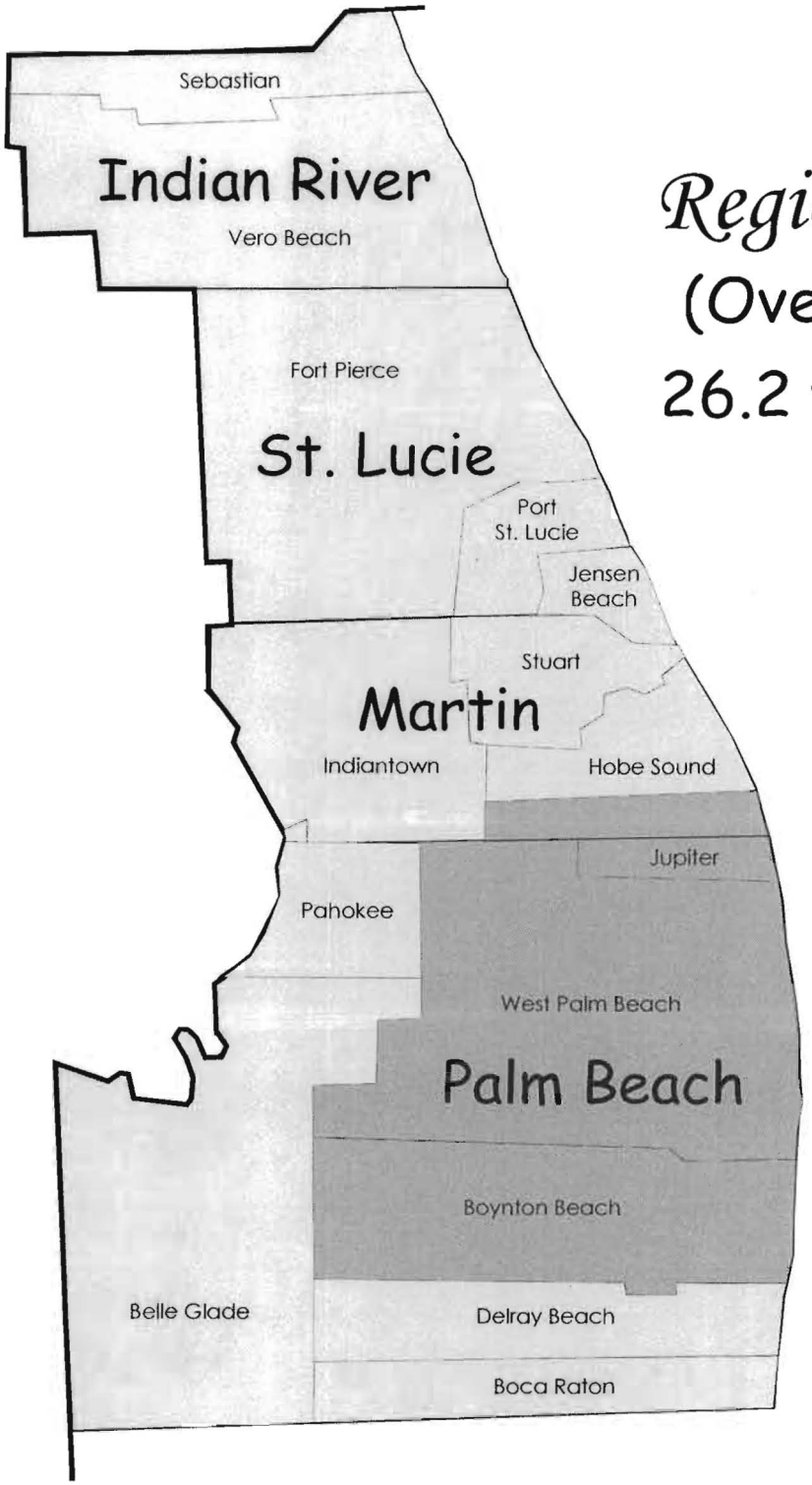
10.5 years

Region B

7.3 years

Alternative #9

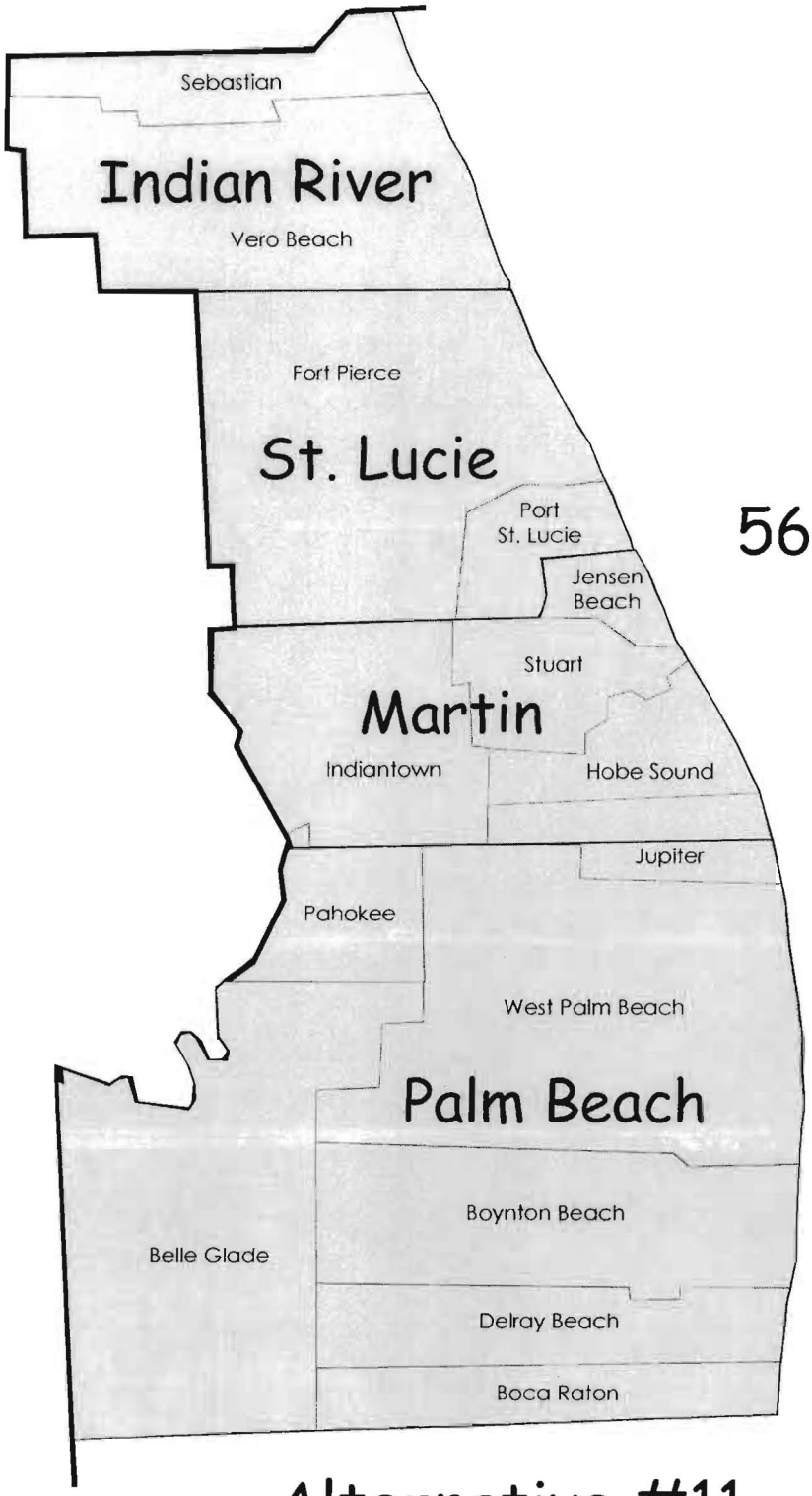
Geographic Split



Region A
(Overlay)
26.2 years

Region B
7.6 years

Alternative #10
Geographic Split and Overlay



Region A

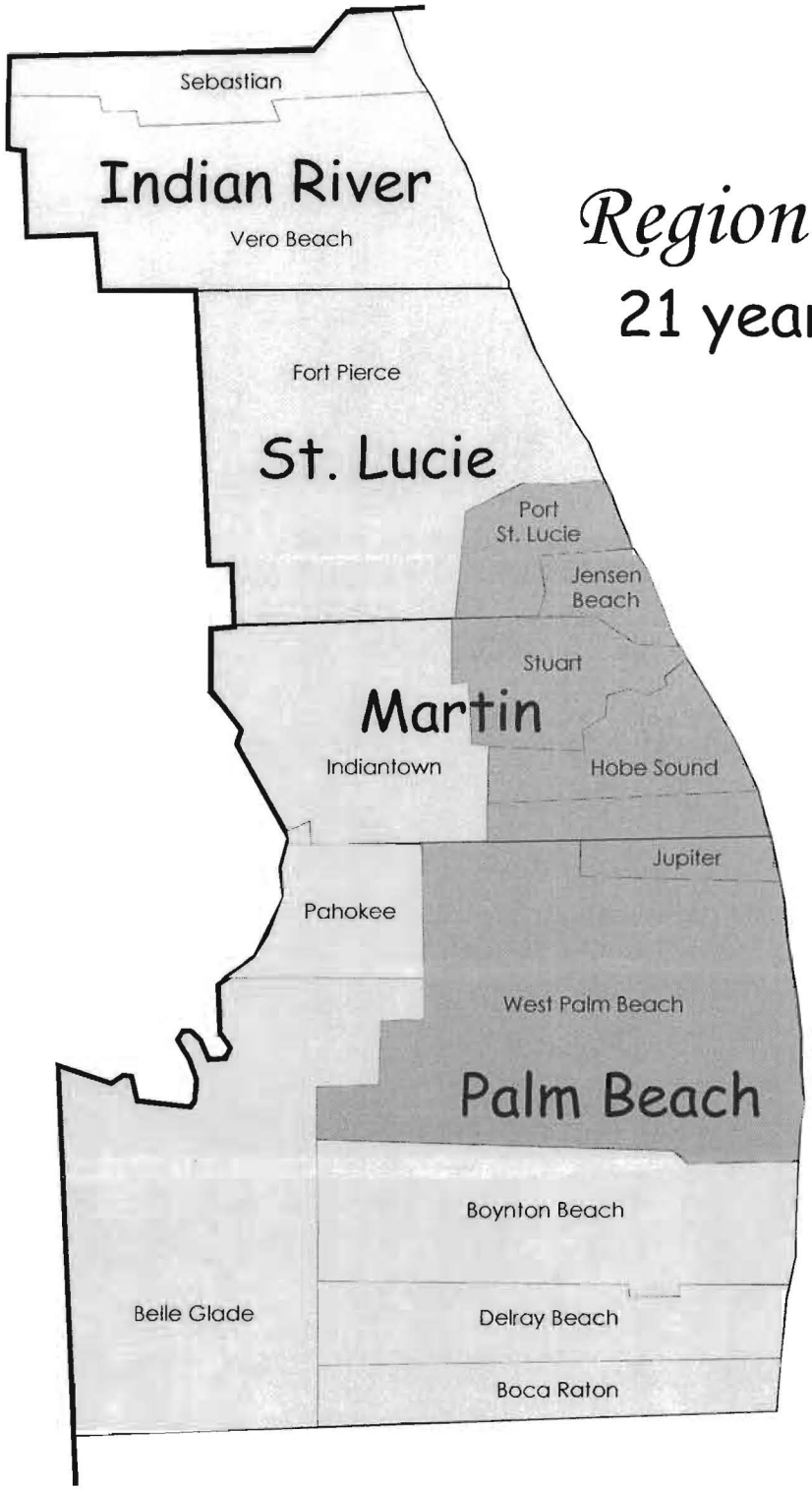
561 and New NPA

20 years

Alternative #11

Overlay with

Number Conservation Measures

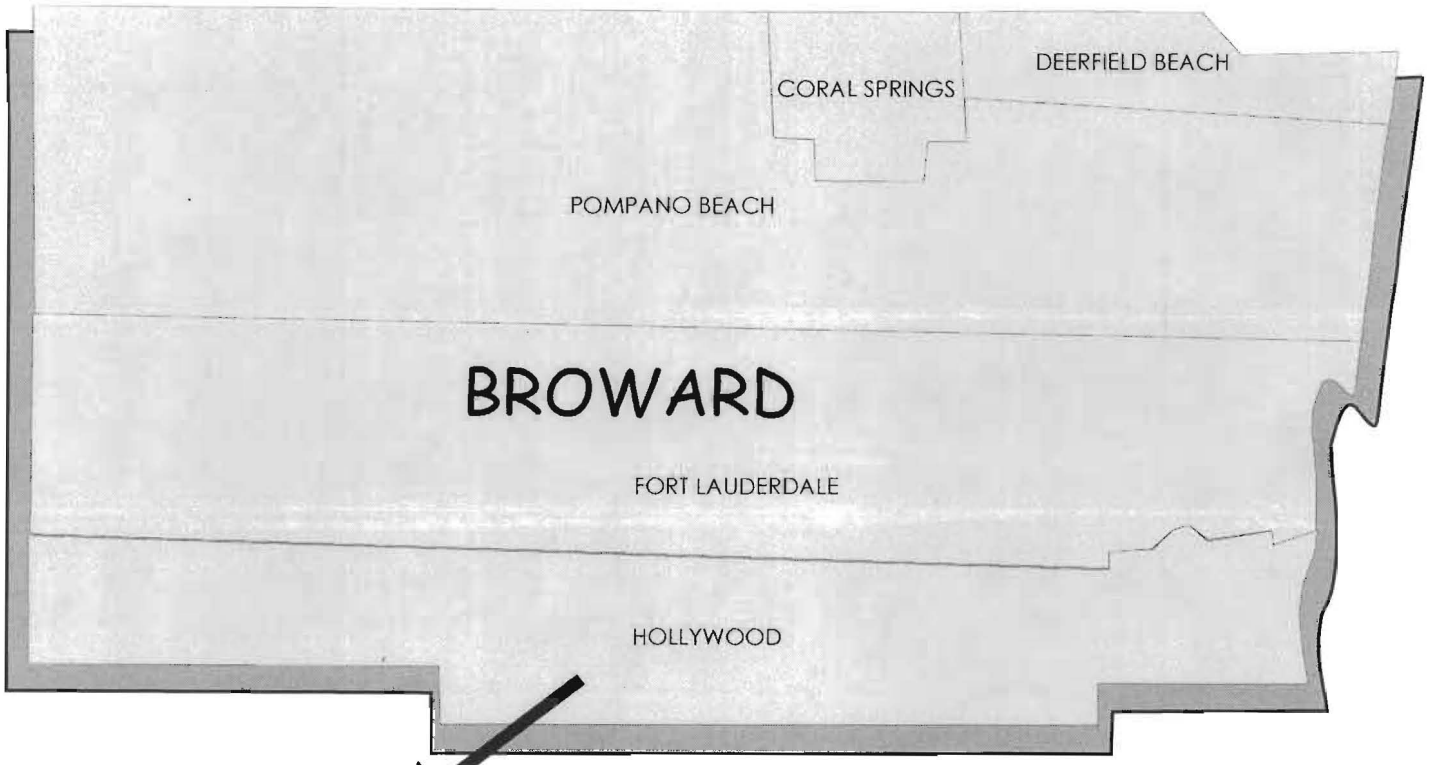


Region A
21 years

Region B
14.6 years

Alternative #12
Geographic Split with
Number Conservation Measures

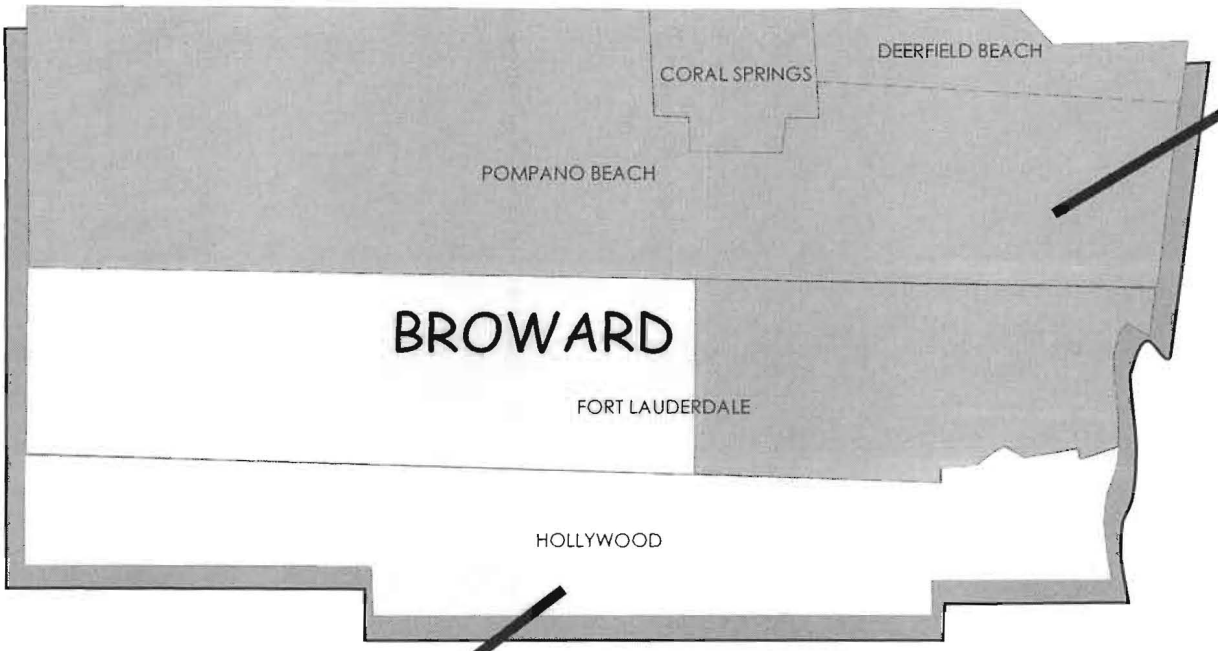
954 and New NPA
Alternative #1
Distributed Overlay*



Region A
9.5 Years

* Recommended by the Industry

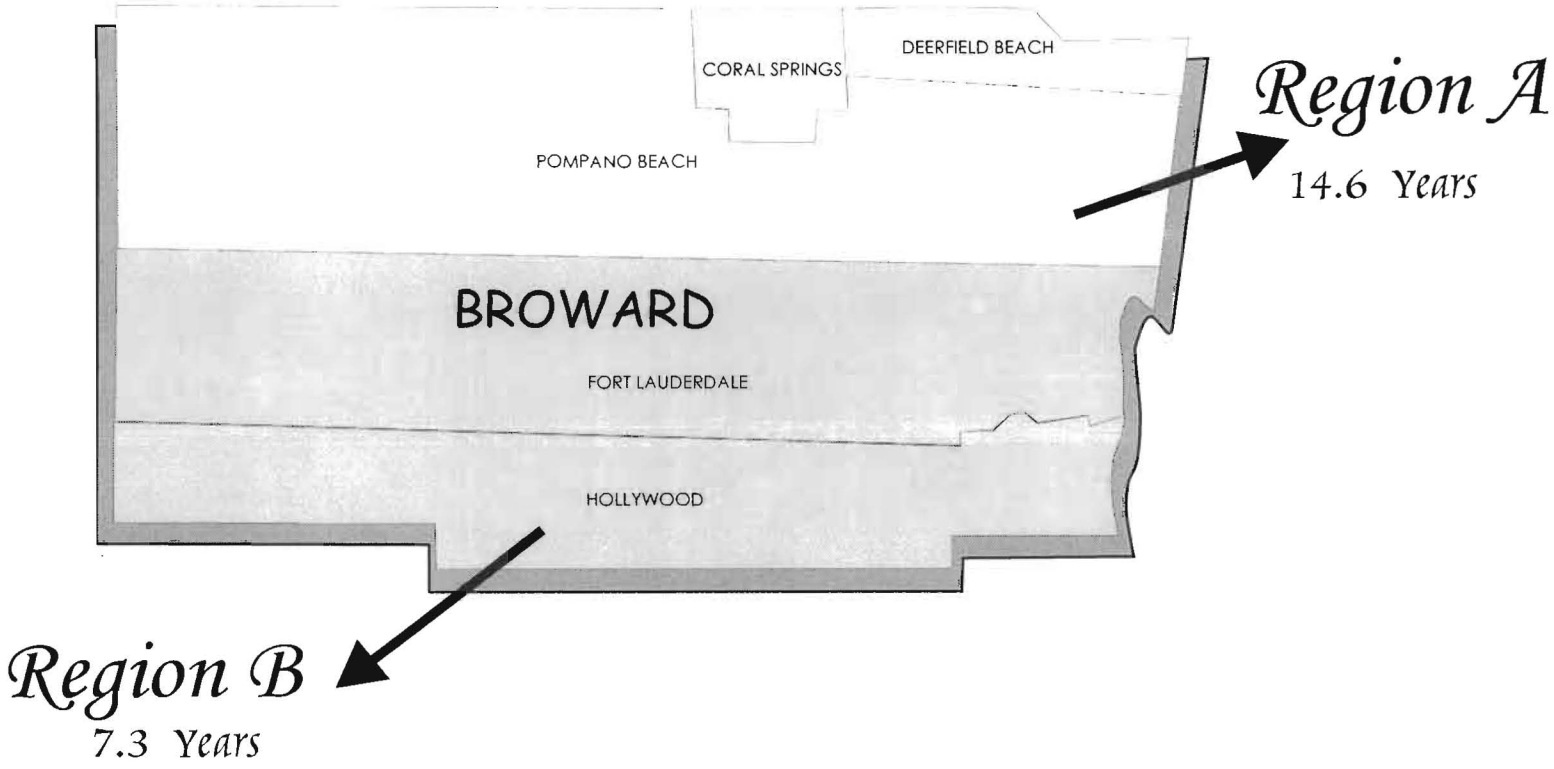
Alternative #2
Geographic Split



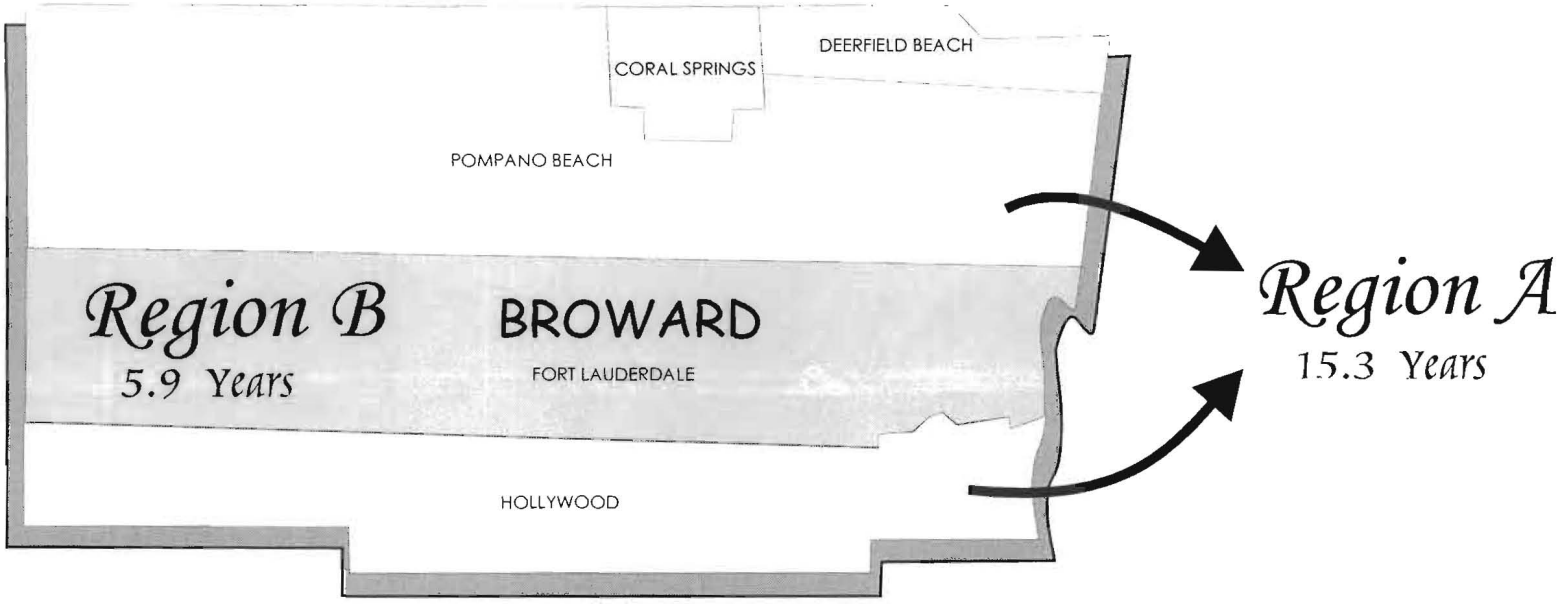
Region A
9.9 Years

Region B
9.2 Years

Alternative #3
Geographic Split and Overlay



Alternative #4
Geographic Split



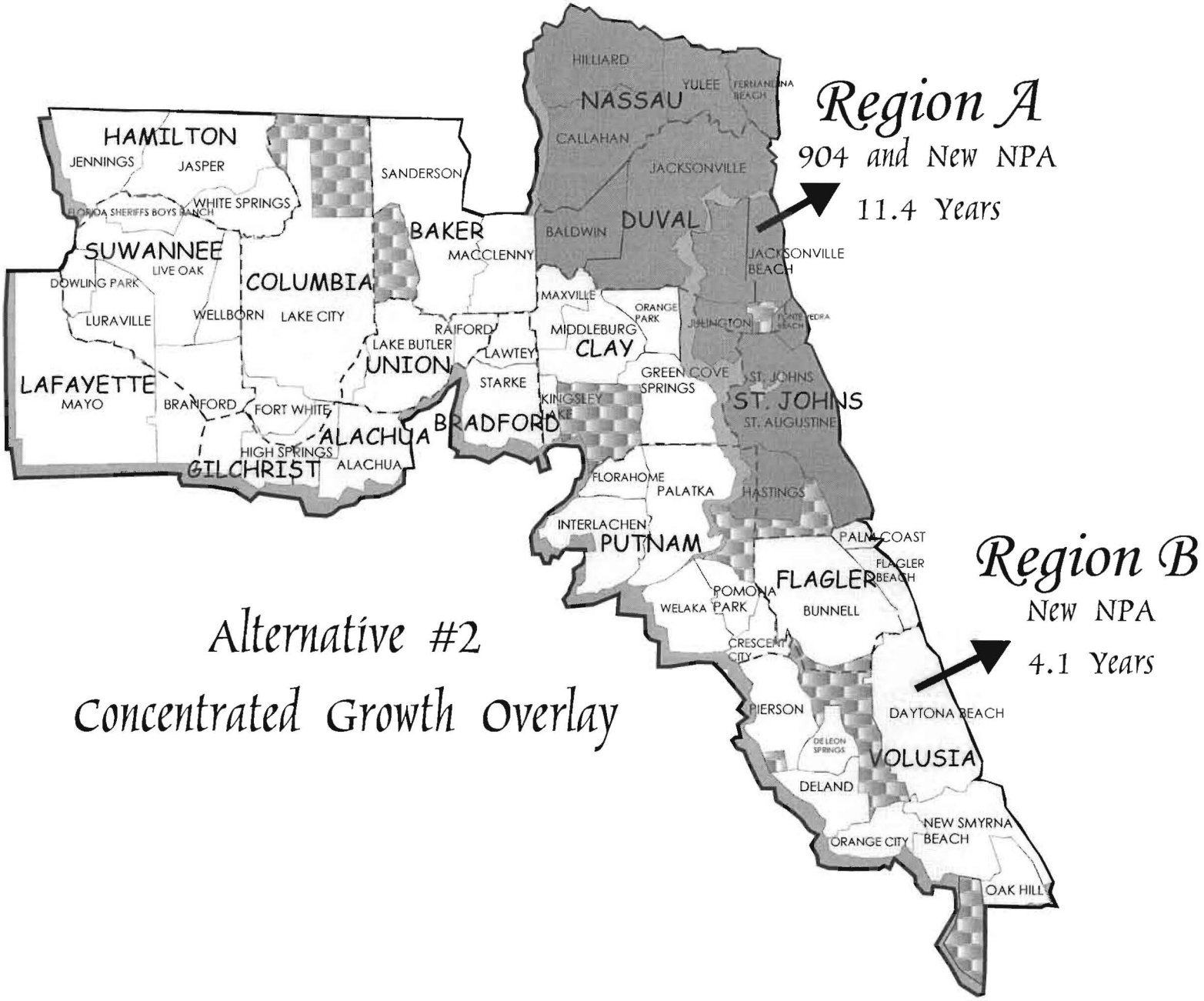
Region A

10.1 Years

Alternative #1

Distributed Overlay*

* Recommended by the Industry



Region A

904 and New NPA

11.4 Years

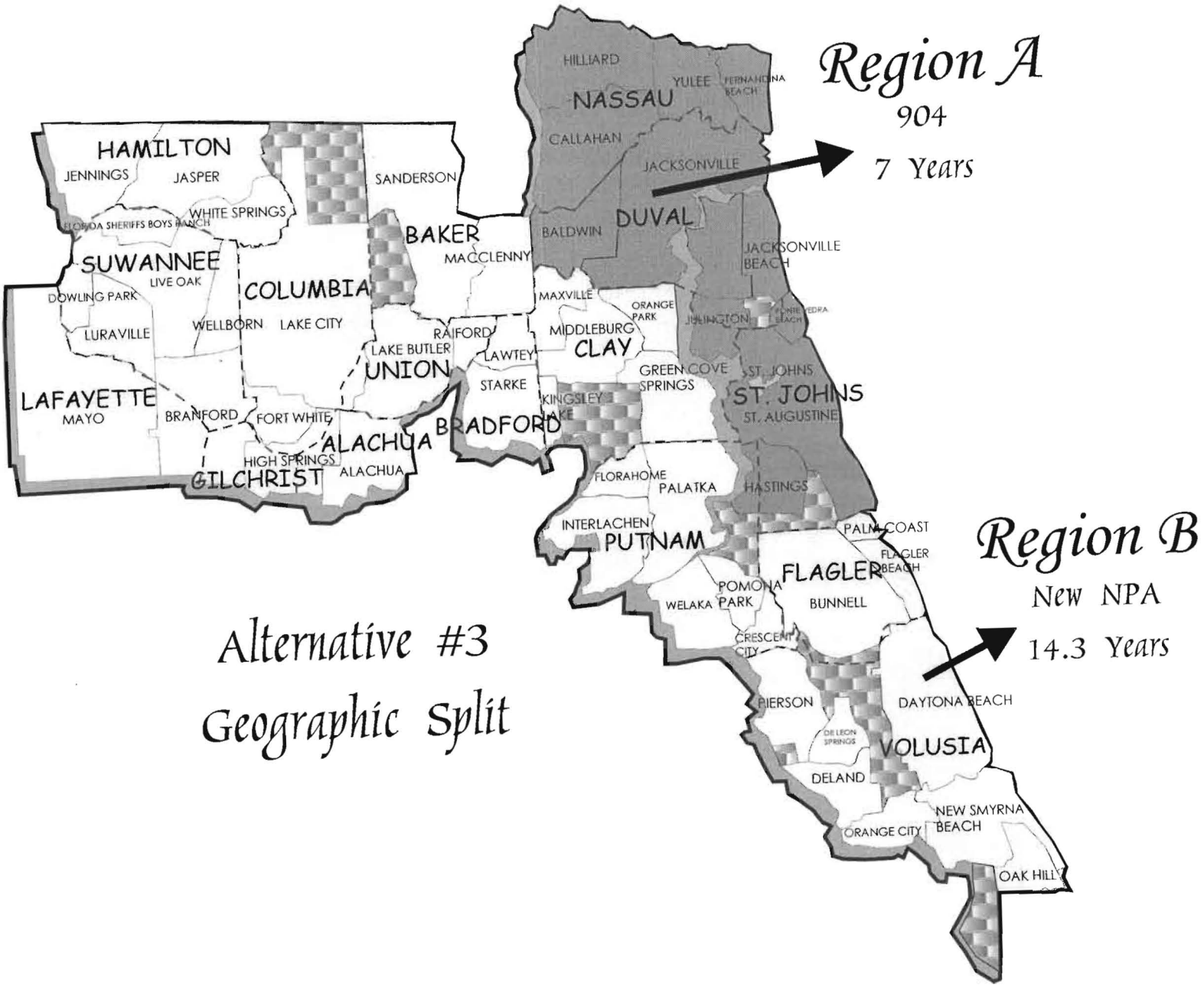
Region B

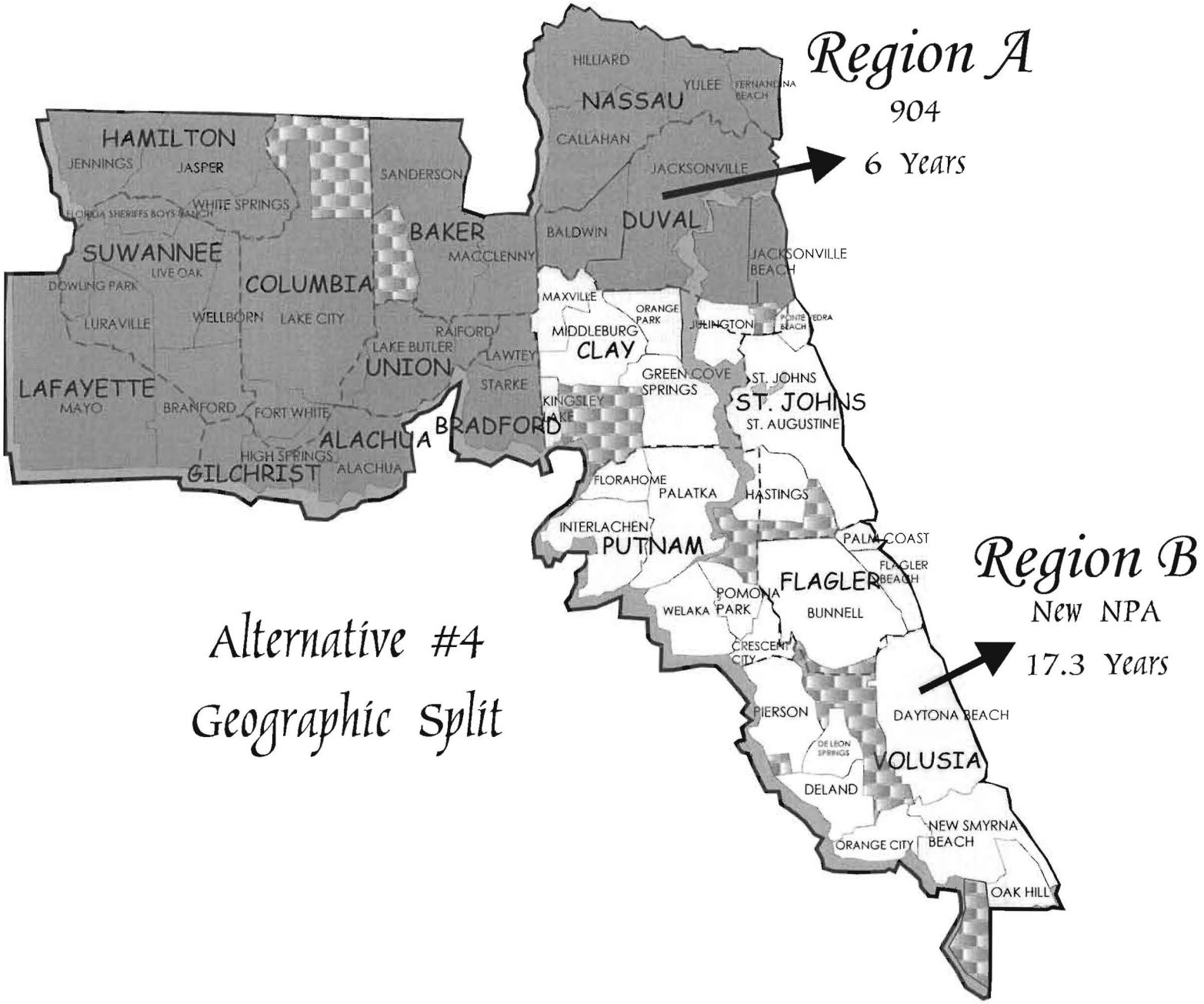
New NPA

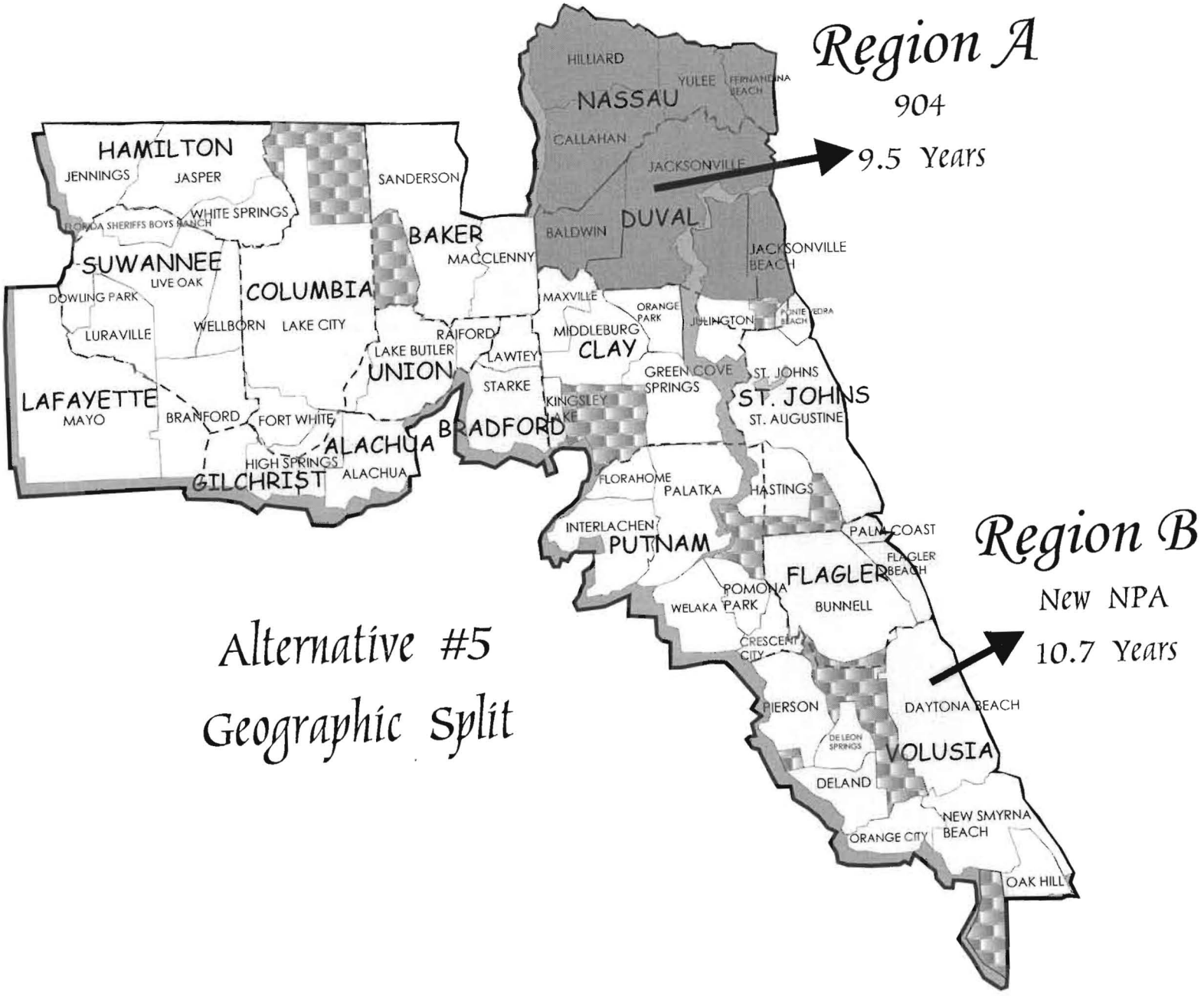
4.1 Years

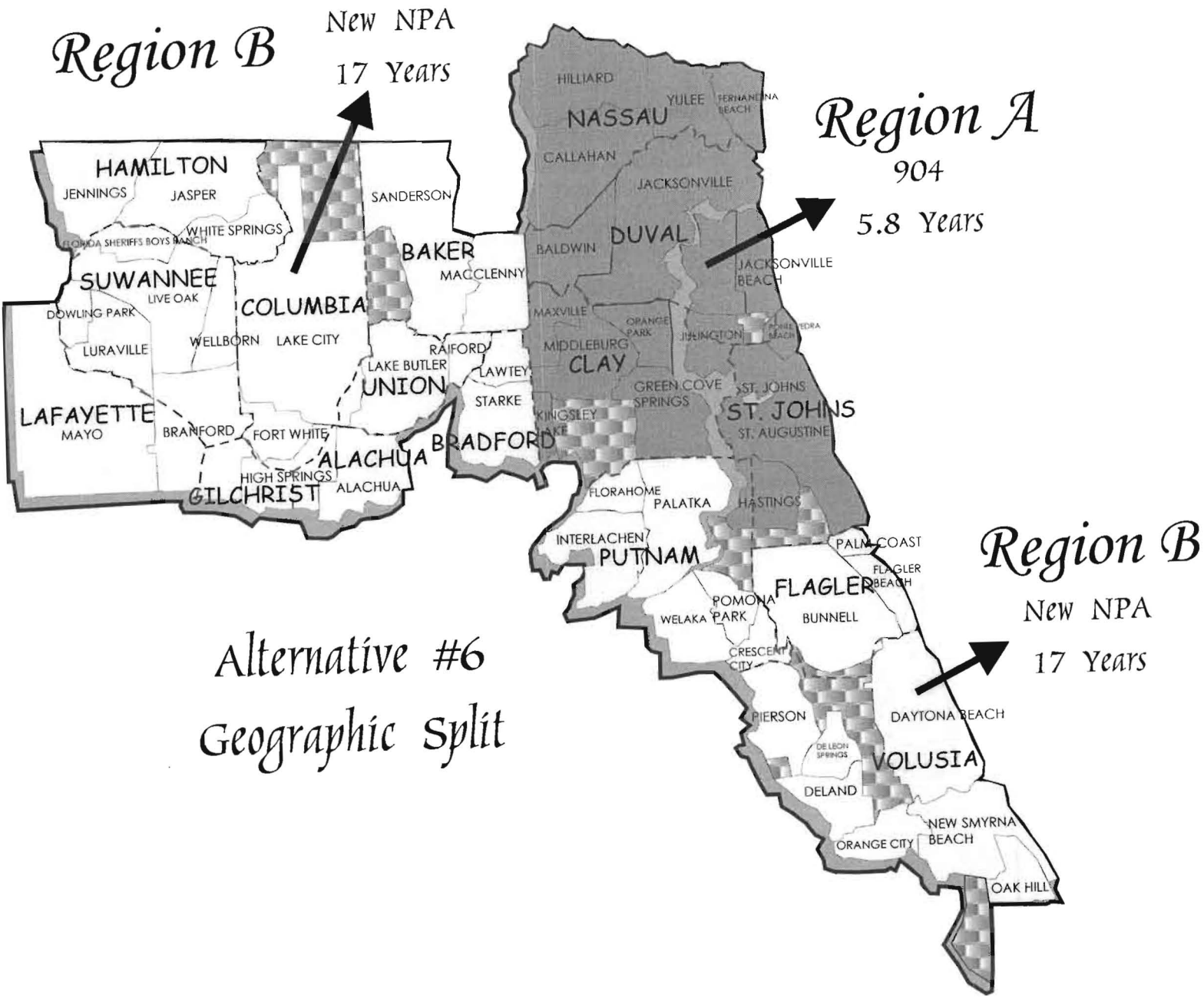
Alternative #2

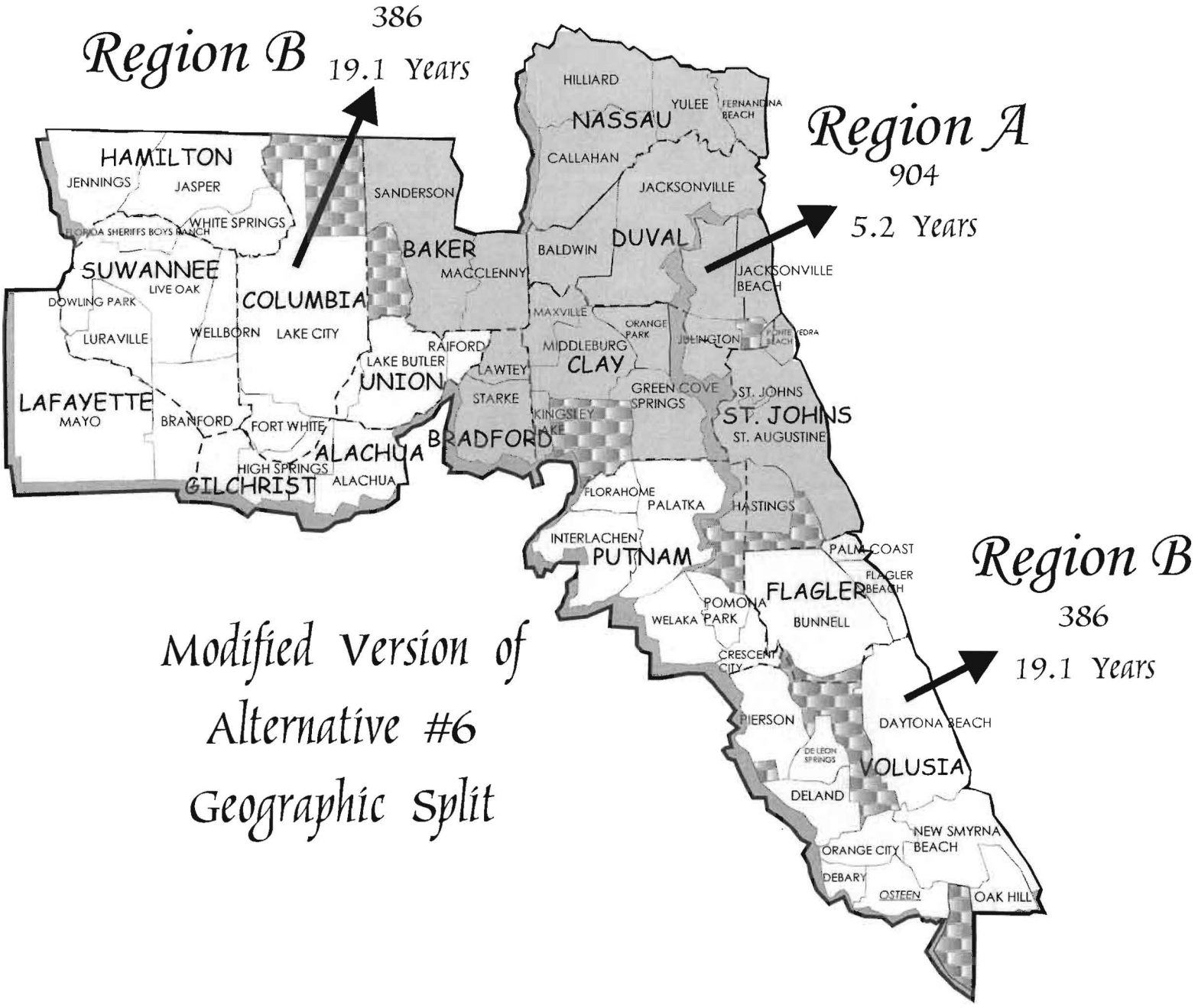
Concentrated Growth Overlay

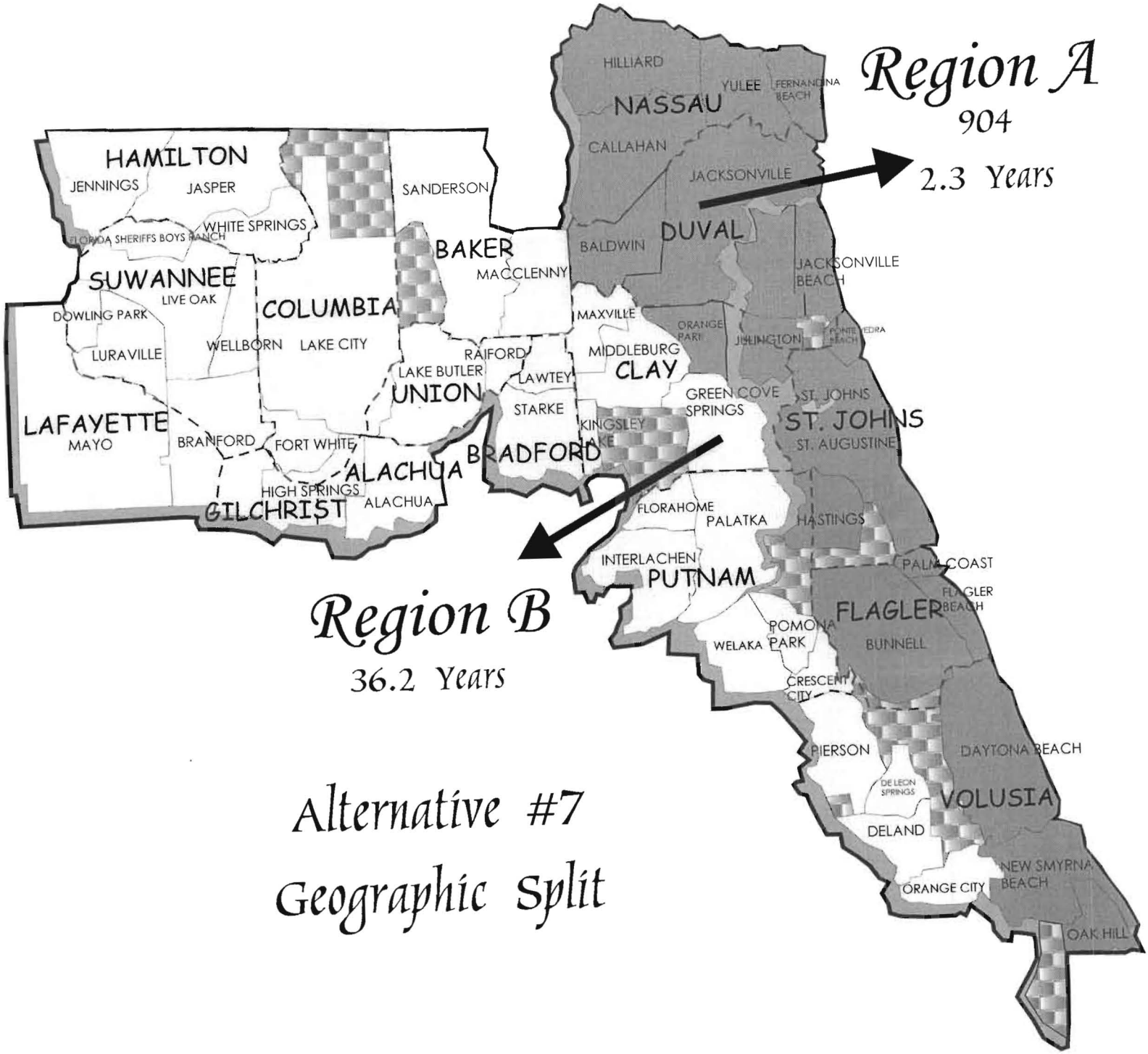

Region A
904
7 Years
Region B
New NPA
14.3 Years
Alternative #3
Geographic Split
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
DUVAL
BALDWIN
JACKSONVILLE BEACH
HAMILTON
JENNINGS
JASPER
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
SANDERSON
BAKER
MACCLENNY
SUWANNEE
LIVE OAK
DOWLING PARK
COLUMBIA
LURAVILLE
WELLBORN
LAKE CITY
RAIFORD
LAKE BUTLER
UNION
LAWTEY
MAXVILLE
ORANGE PARK
JULINGTON
CRESCENT BEACH
MIDDLEBURG
CLAY
GREEN COVE SPRINGS
ST. JOHNS
ST. AUGUSTINE
STARKE
KINGSLEY LAKE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
ALACHUA
BRADFORD
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL

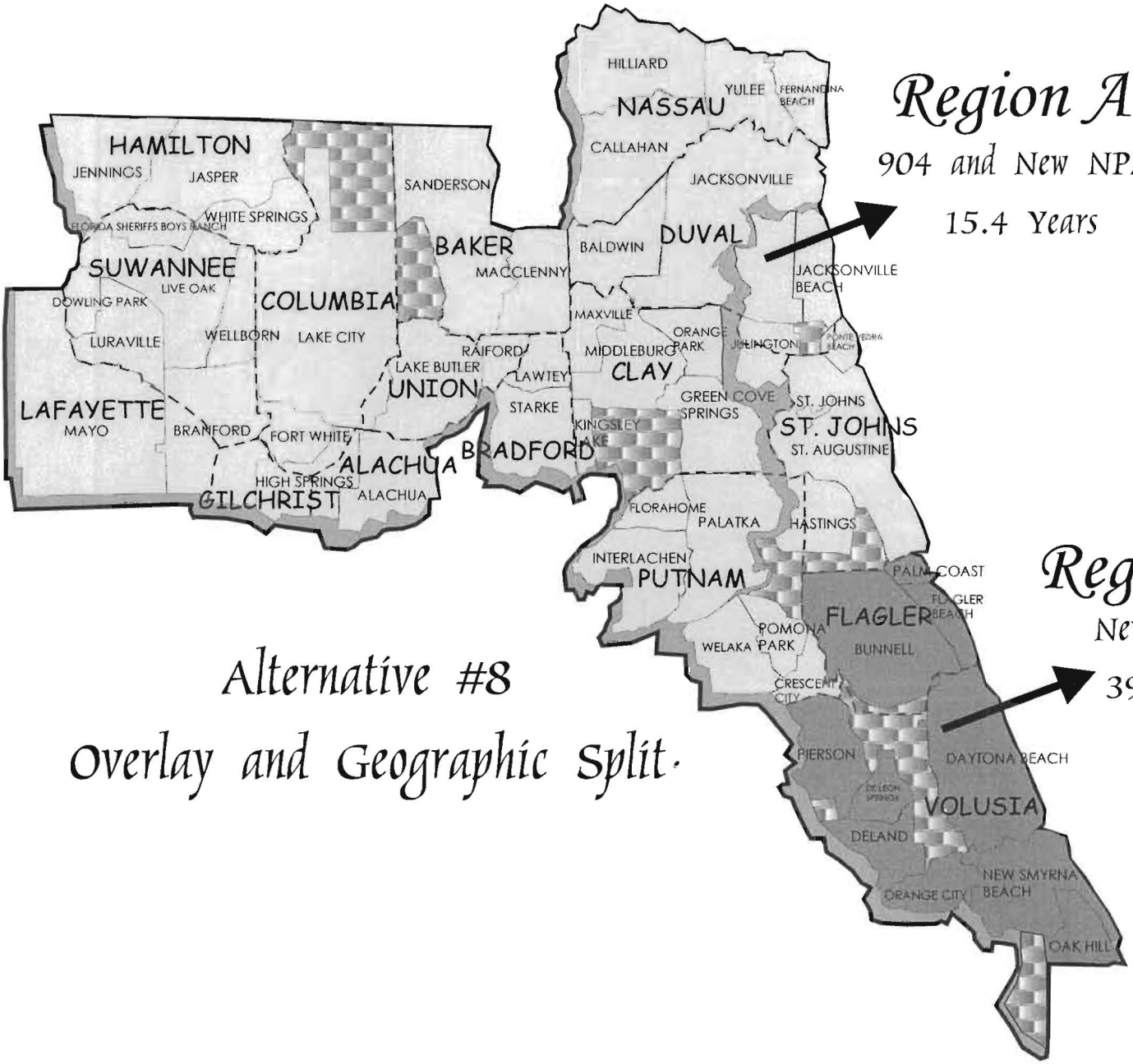

Region A
904
6 Years
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
HAMILTON
JENNINGS
JASPER
SANDERSON
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
BAKER
BALDWIN
DUVAL
SUWANNEE
LIVE OAK
MACCLENNY
JACKSONVILLE BEACH
DOWLING PARK
COLUMBIA
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
LURAVILLE
WELLBORN
LAKE CITY
RAIFORD
MIDDLEBURG
CLAY
LAKE BUTLER
LAWTEY
UNION
GREEN COVE SPRINGS
ST. JOHNS
LAFAYETTE
STARKE
KINGSLEY LAKE
ST. JOHNS
ST. AUGUSTINE
MAYO
BRANFORD
FORT WHITE
BRADFORD
ALACHUA
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL
Region B
New NPA
17.3 Years
Alternative #4
Geographic Split


Region A
904
9.5 Years
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
DUVAL
BALDWIN
JACKSONVILLE BEACH
HAMILTON
JENNINGS
JASPER
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
SANDERSON
BAKER
MACCLENNY
SUWANNEE
LIVE OAK
DOWLING PARK
COLUMBIA
LURAVILLE
WELLBORN
LAKE CITY
RAIFORD
LAKE BUTLER
UNION
LAWTEY
STARKE
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
MIDDLEBURG
CLAY
GREEN COVE SPRINGS
ST. JOHNS
ST. JOHNS
ST. AUGUSTINE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
ALACHUA
BRADFORD
KINGSLEY LAKE
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
Region B
New NPA
10.7 Years
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL
Alternative #5
Geographic Split


Region B
New NPA
17 Years
Region A
904
5.8 Years
Region B
New NPA
17 Years
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
DUVAL
BALDWIN
JACKSONVILLE BEACH
HAMILTON
JENNINGS
JASPER
SANDERSON
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
BAKER
MACCLENNY
SUWANNEE
LIVE OAK
COLUMBIA
DOWLING PARK
LURAVILLE
WELLBORN
LAKE CITY
RAIFORD
LAKE BUTLER
UNION
LAWTEY
STARKE
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
MIDDLEBURG
CLAY
GREEN COVE SPRINGS
ST. JOHNS
ST. AUGUSTINE
KINGSLEY
LAKE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
ALACHUA
BRADFORD
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL
Alternative #6
Geographic Split


Region B
386
19.1 Years
Region A
904
5.2 Years
Region B
386
19.1 Years
Modified Version of
Alternative #6
Geographic Split
HAMILTON
JENNINGS
JASPER
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
SUWANNEE
LIVE OAK
DOWLING PARK
LURAVILLE
WELLBORN
LAKE CITY
COLUMBIA
SANDERSON
BAKER
MACCLENNY
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
BALDWIN
DUVAL
JACKSONVILLE BEACH
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
RAIFORD
LAKE BUTLER
UNION
LAWTEY
MIDDLEBURG
CLAY
GREEN COVE SPRINGS
ST. JOHNS
ST. AUGUSTINE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
STARKE
KINGSLEY LAKE
BRADFORD
ALACHUA
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
DEBARY
OSTEEN
OAK HILL


Region A
904
2.3 Years
Region B
36.2 Years
Alternative #7
Geographic Split
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
DUVAL
BALDWIN
JACKSONVILLE BEACH
HAMILTON
JENNINGS
JASPER
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
SANDERSON
BAKER
MACCLENNY
SUWANNEE
LIVE OAK
DOWLING PARK
COLUMBIA
LURAVILLE
WELLBORN
LAKE CITY
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
RAIFORD
LAKE BUTLER
LAWTEY
MIDDLEBURG
CLAY
UNION
STARKE
GREEN COVE SPRINGS
ST. JOHNS
ST. JOHNS
ST. AUGUSTINE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
KINGSLEY LAKE
BRADFORD
ALACHUA
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL



Region A

904 and New NPA$_1$

15.4 Years

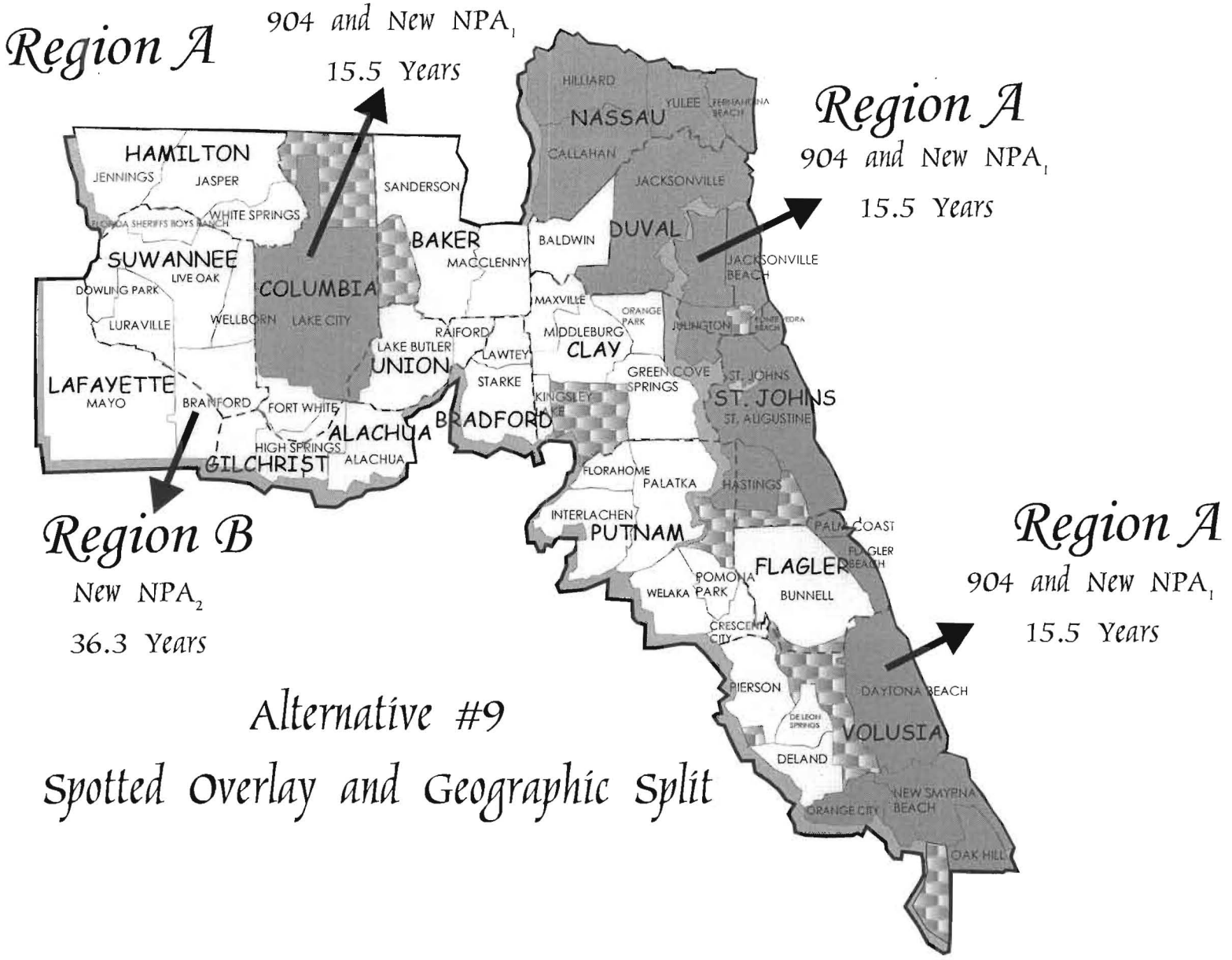
Region B

New NPA$_2$

39 Years

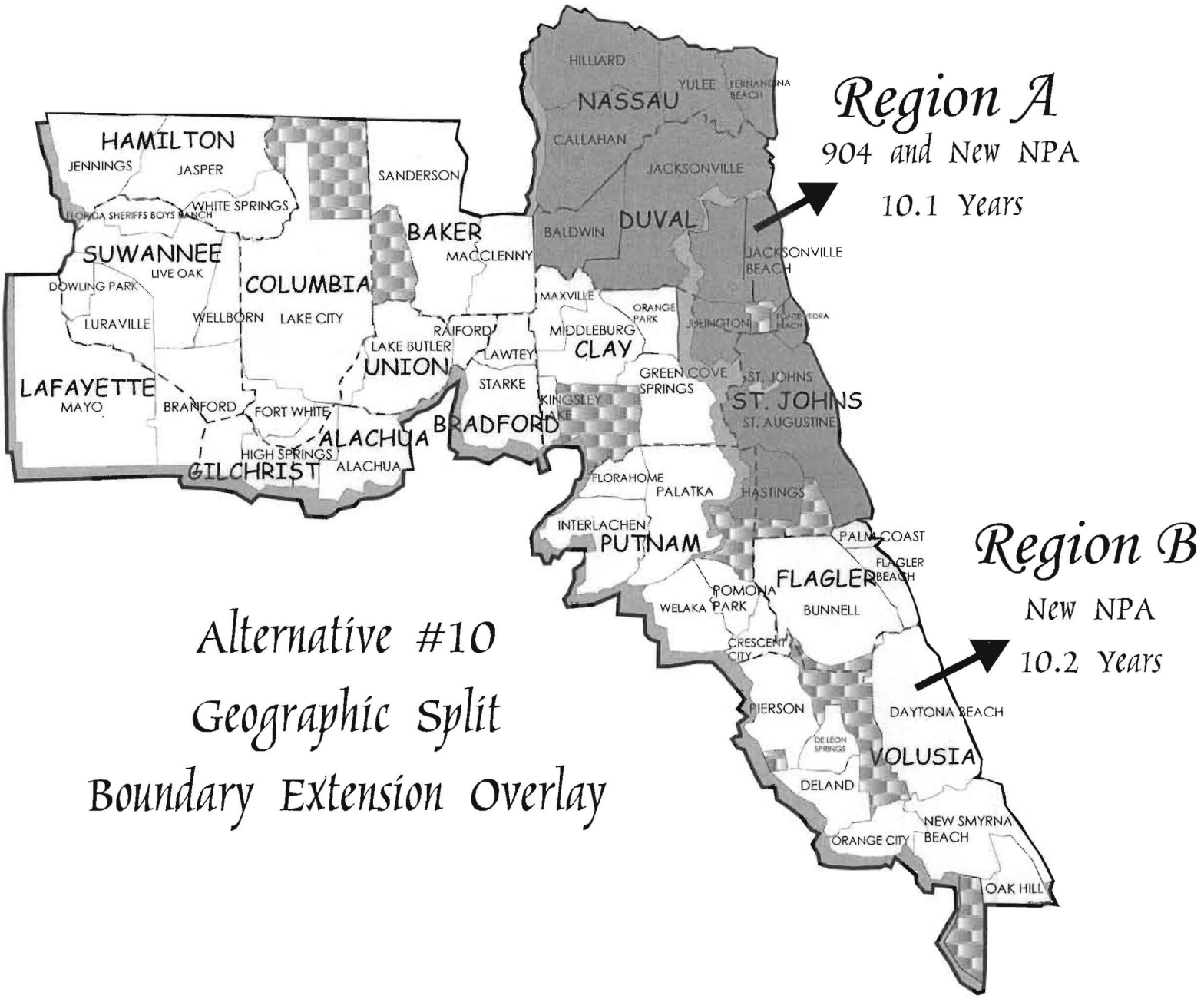
Alternative #8

Overlay and Geographic Split.



Alternative #9

Spotted Overlay and Geographic Split



Region A

904 and New NPA

10.1 Years

Region B

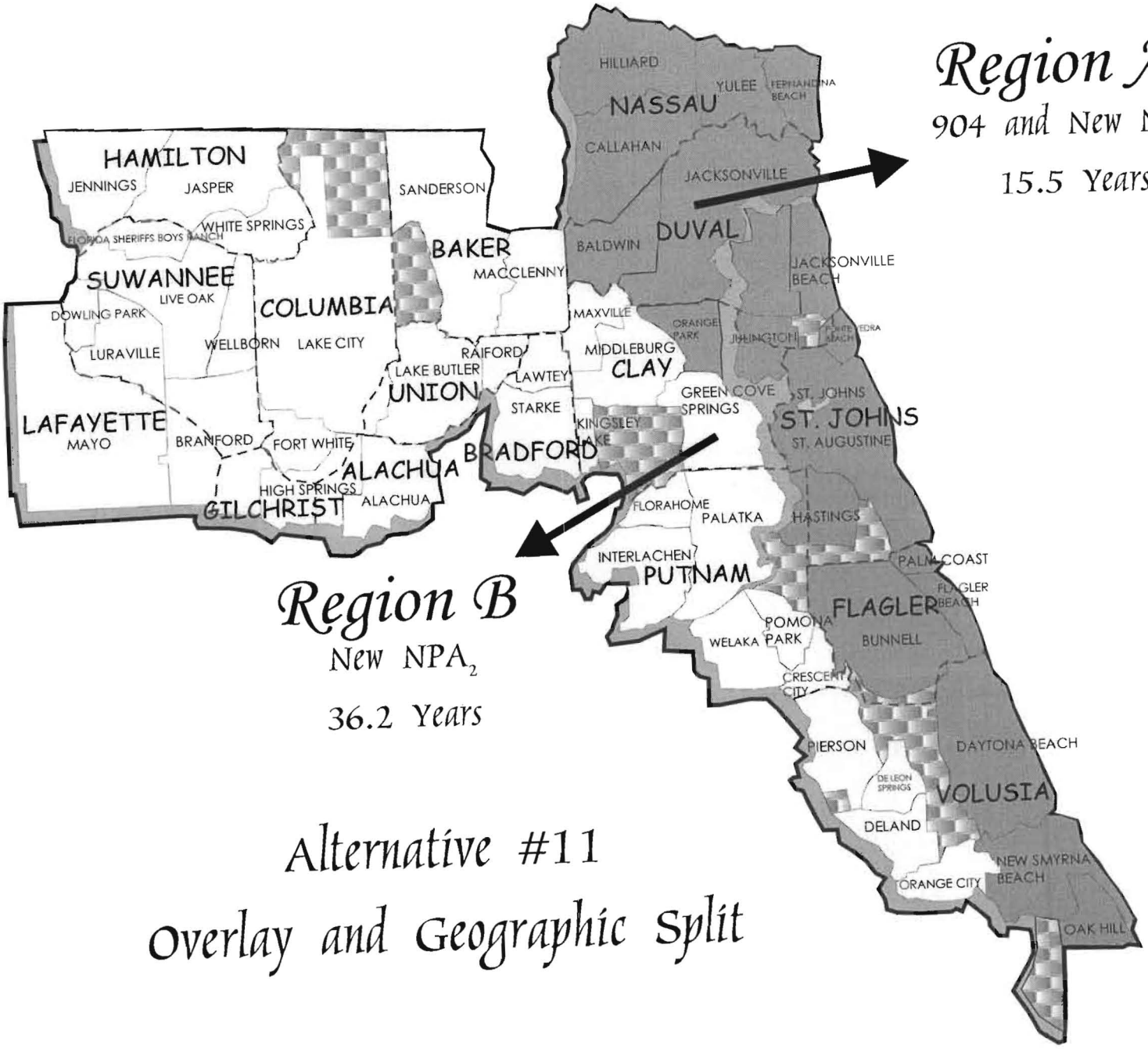
New NPA

10.2 Years

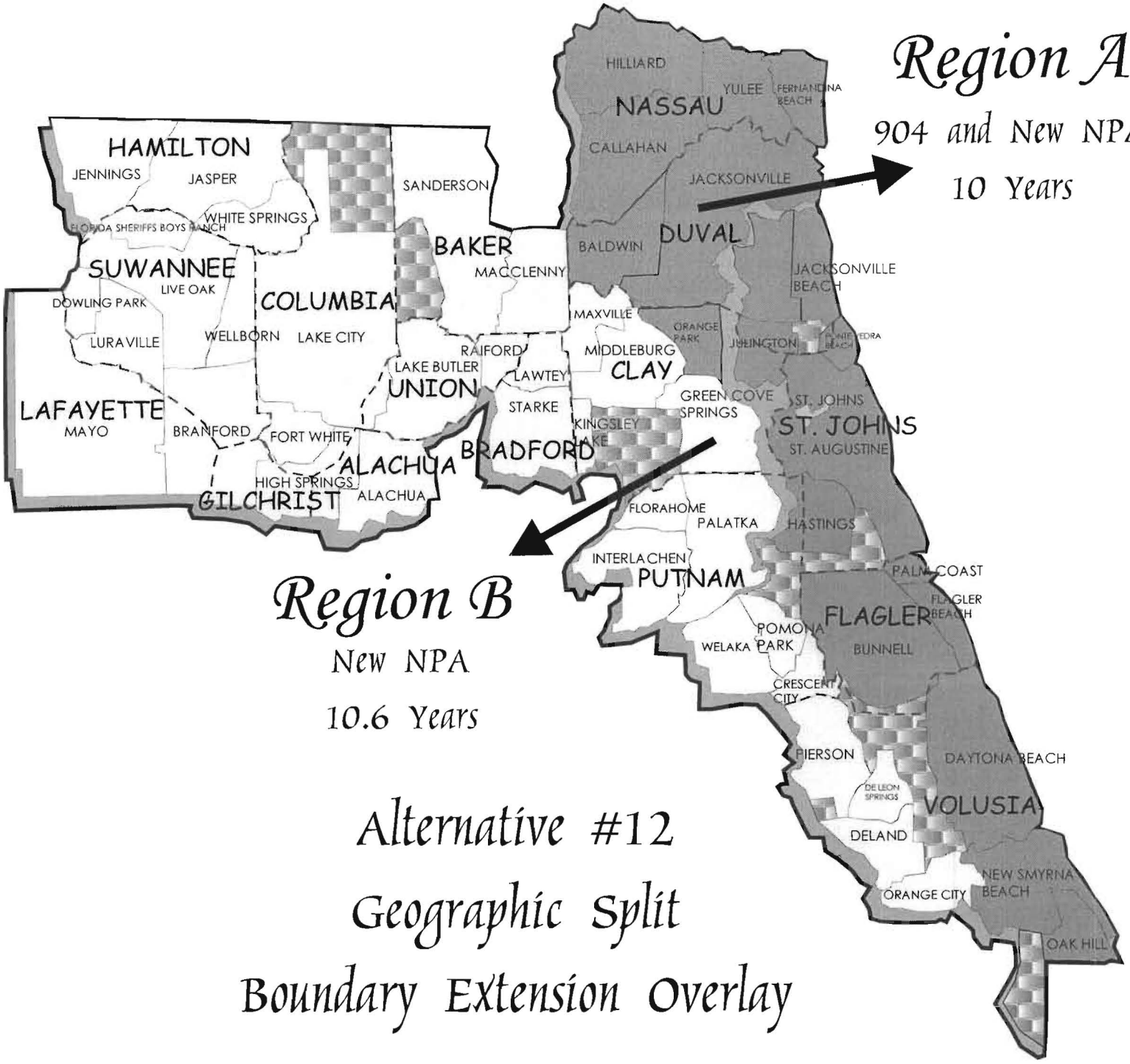
Alternative #10

Geographic Split

Boundary Extension Overlay



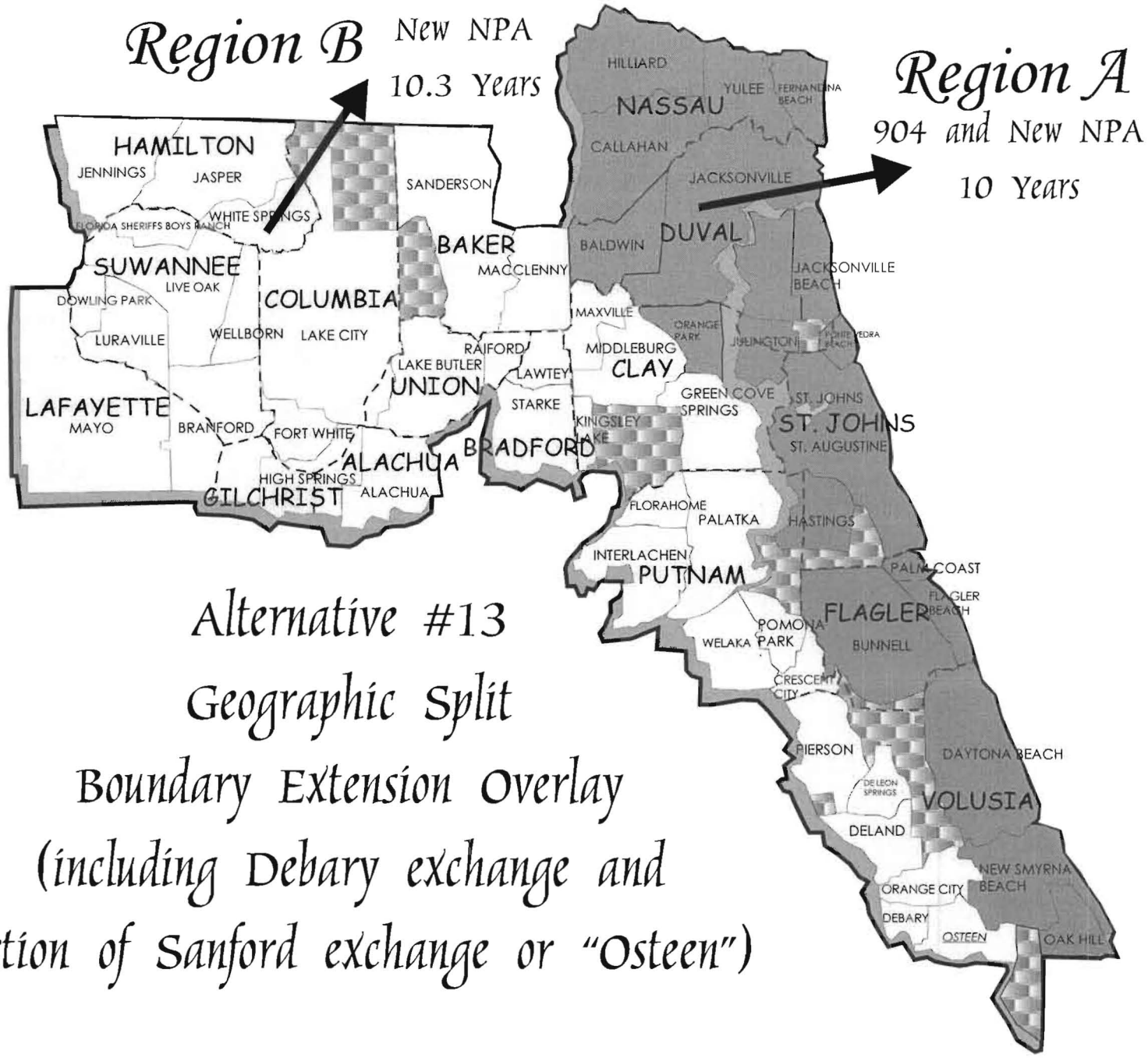
Alternative #11
Overlay and Geographic Split



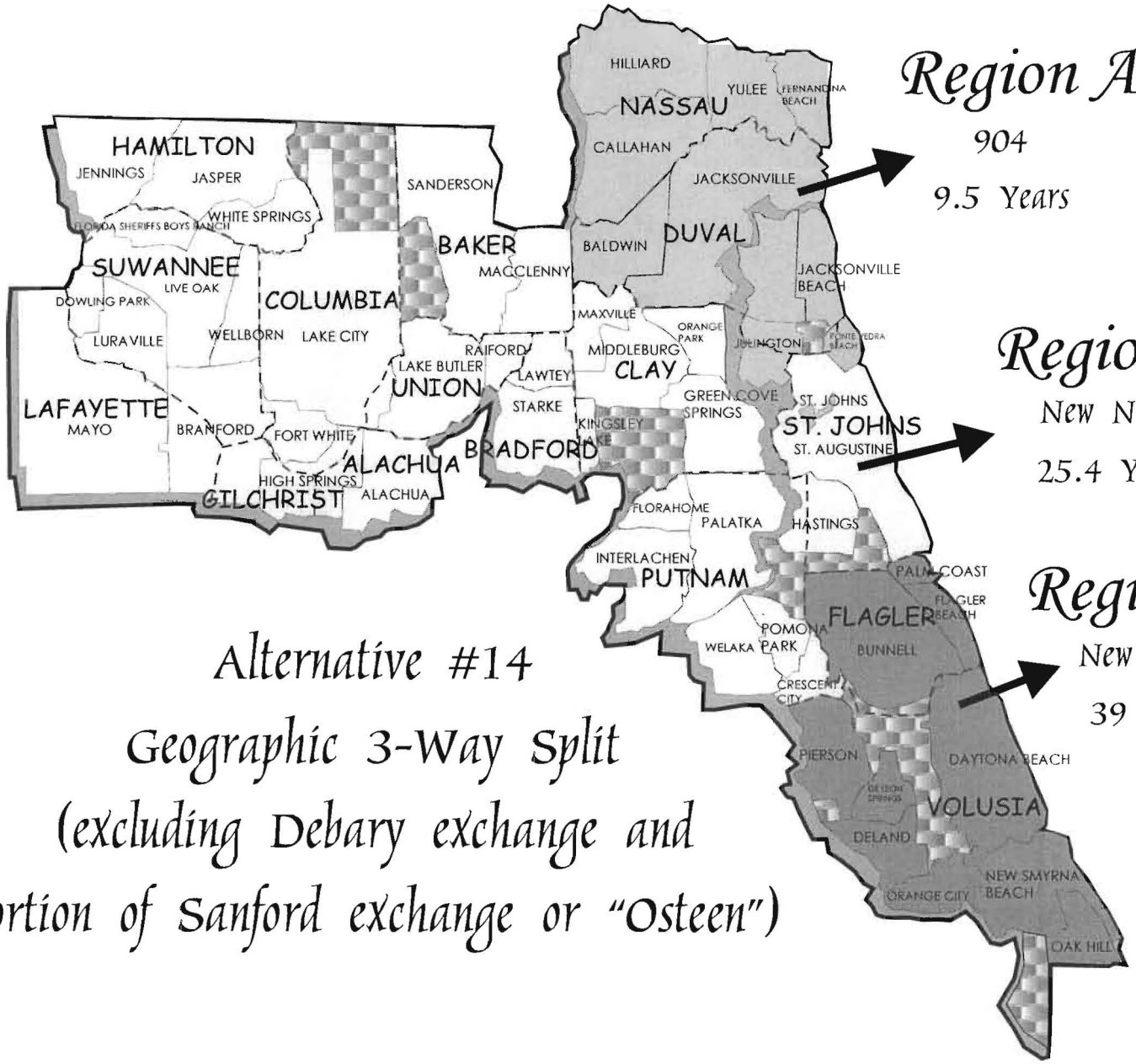
Alternative #12

Geographic Split

Boundary Extension Overlay



Alternative #13
Geographic Split
Boundary Extension Overlay
(including Debary exchange and portion of Sanford exchange or "Osteen")



Region A

904

9.5 Years

Region B

New NPA$_1$

25.4 Years

Region C

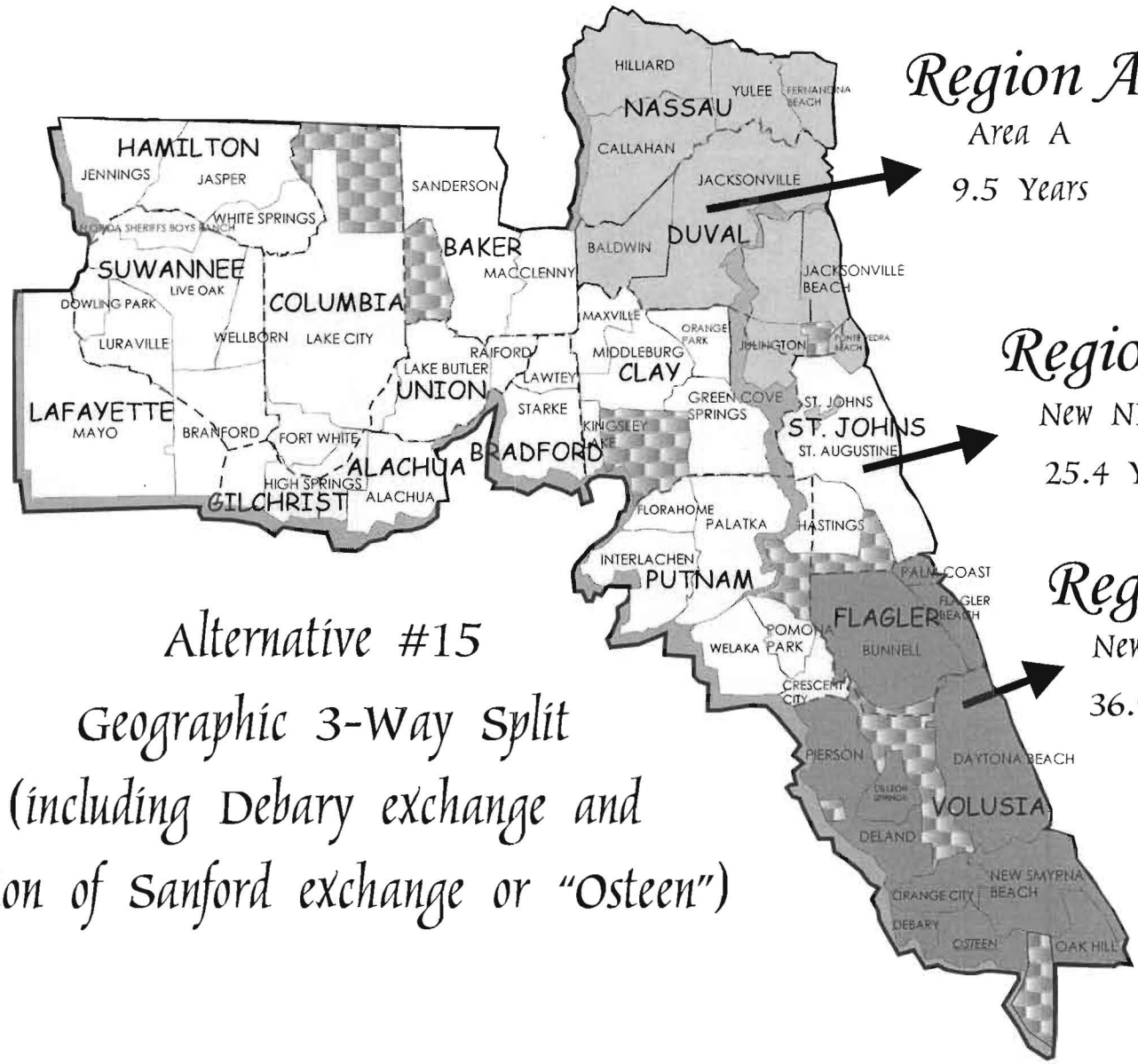
New NPA$_2$

39 Years

Alternative #14

Geographic 3-Way Split

(excluding Debary exchange and portion of Sanford exchange or "Osteen")



Region A

Area A

9.5 Years

Region B

New NPA$_1$

25.4 Years

Region C

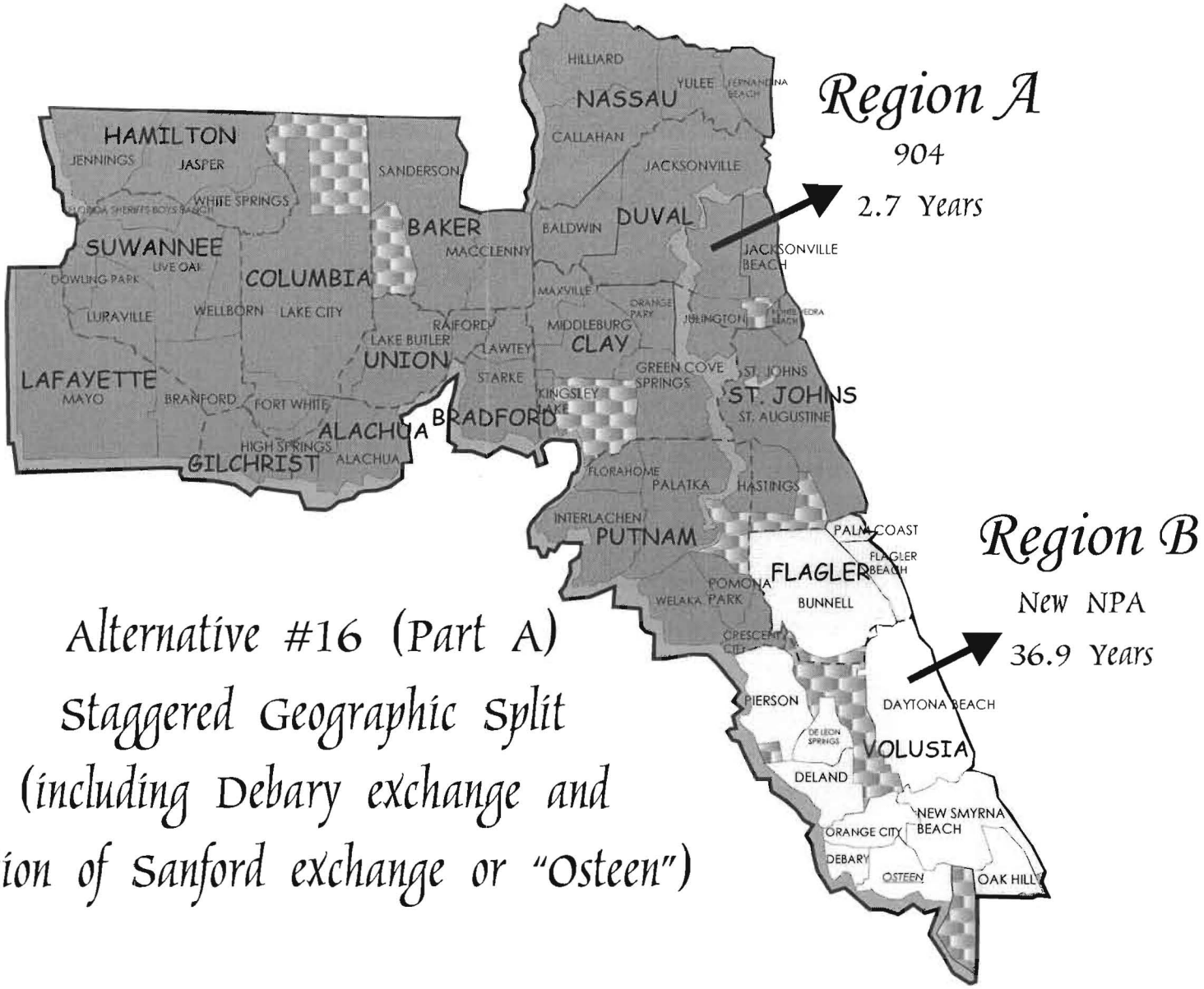
New NPA$_2$

36.9 Years

Alternative #15

Geographic 3-Way Split

(including Debary exchange and portion of Sanford exchange or "Osteen")



Region A

904

2.7 Years

Region B

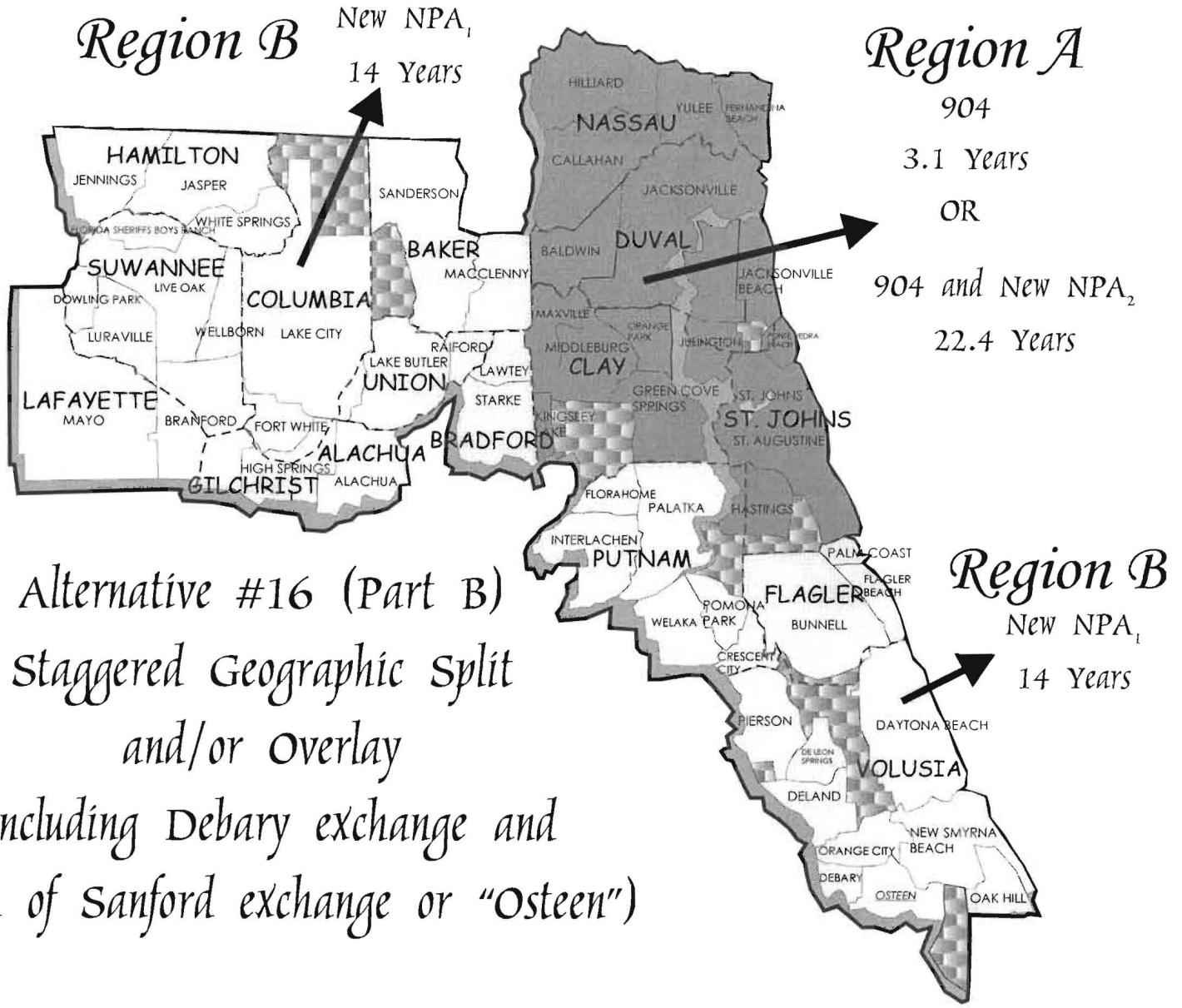
New NPA

36.9 Years

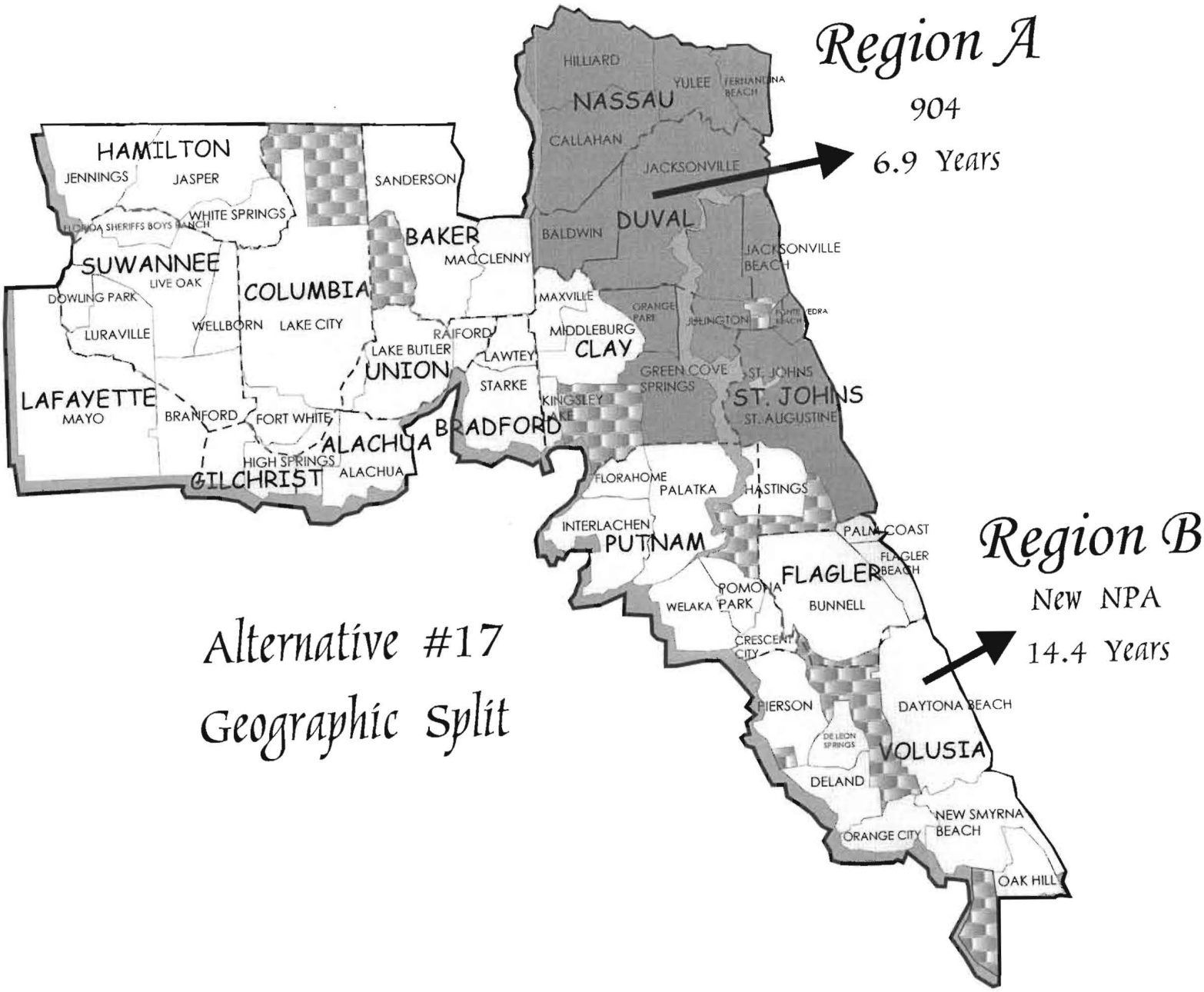
Alternative #16 (Part A)

Staggered Geographic Split

(including Debary exchange and portion of Sanford exchange or "Osteen")



Alternative #16 (Part B)
Staggered Geographic Split and/or Overlay
(including Debary exchange and portion of Sanford exchange or "Osteen")


Region A
904
6.9 Years
HILLIARD
NASSAU
YULEE
FERNANDINA BEACH
CALLAHAN
JACKSONVILLE
DUVAL
BALDWIN
JACKSONVILLE BEACH
HAMILTON
JENNINGS
JASPER
WHITE SPRINGS
FLORIDA SHERIFFS BOYS RANCH
SANDERSON
BAKER
MACCLENNY
SUWANNEE
LIVE OAK
DOWLING PARK
LURAVILLE
WELLBORN
LAKE CITY
COLUMBIA
MAXVILLE
ORANGE PARK
JULINGTON
PONTE VEDRA BEACH
RAIFORD
LAKE BUTLER
UNION
LAWTEY
MIDDLEBURG
CLAY
GREEN COVE SPRINGS
ST. JOHNS
ST. AUGUSTINE
STARKE
KINGSLEY LAKE
LAFAYETTE
MAYO
BRANFORD
FORT WHITE
ALACHUA
BRADFORD
HIGH SPRINGS
GILCHRIST
ALACHUA
FLORAHOME
PALATKA
HASTINGS
INTERLACHEN
PUTNAM
PALM COAST
FLAGLER BEACH
FLAGLER
POMONA PARK
WELAKA
BUNNELL
CRESCENT CITY
PIERSON
DAYTONA BEACH
DE LEON SPRINGS
VOLUSIA
DELAND
NEW SMYRNA BEACH
ORANGE CITY
OAK HILL
Region B
New NPA
14.4 Years
Alternative #17
Geographic Split