



ORIGINAL

November 28, 2000

By Overnight Courier

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

Re: Docket No. 990456-TL

Dear Ms. Bayo:

Pursuant to the NPA Code Relief Planning & Notification Guidelines, NeuStar, Inc., in its capacity as the North American Numbering Plan Administrator ("NANPA"), hereby notifies the Florida Public Service Commission ("Commission") that the Florida telecommunications industry request for a new relief numbering plan area ("NPA") code as ordered by the Commission in its October 20, 2000 order directing a geographic split of the 561 NPA ("NPA Relief Order") is denied.

1 NPA Code Relief & Planning Guidelines, INC 97-0404-016 (Nov. 8, 1999) ("NPA Code Relief Planning Guidelines"); NPA Allocation and Assignment Guidelines, INC 96-0308-011 (Feb. 28, 2000) ("NPA Assignment Guidelines"). The NPA Code Relief Planning Guidelines and NPA Assignment Guidelines can be accessed on the ATIS web site located at http://www.atis.org/atis/clc/inc/incdocs.htm. Federal Communications Commission ("FCC") rules require NANPA to assign and administer NANP resources in an efficient, effective, fair, unbiased, and non-discriminatory manner consistent with industry-developed guidelines and FCC regulations. 47 C.F.R. §52.13(b)(3), (d).

2 Request for Review of Proposed Numbering Plan Relief for the 305/786 Area Code - Dade County and Monroe County/Keys Region (Docket No. 990455-TL); Request for Review of Proposed Numbering Plan Relief for the 561 Area Code (Docket No. 990456-TL); Request for Review of Proposed Numbering Plan Relief for the 954 Area Code (Docket No. 990457-TL); Request for Review of Proposed Numbering Plan Relief for the 904 Area Code (Docket No. 990517-TL), Order No. PSC-00-1937-PAA-TL (Oct. 20, 2000).

The application for the relief NPA code was submitted by Thomas C. Foley, NPA Relief Planner, NANPA, on behalf of the Florida telecommunications industry on November 13, 2000.

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The Commission's NPA Relief Order is inconsistent with the NPA Assignment Guidelines which require that the relief options shall cover a period of at least five years<sup>4</sup> beyond the projected date of exhaust and that the difference in NPA lifetimes of more than 15 years must be avoided.<sup>5</sup> In the NPA Relief Order, the Commission ordered a geographic split as the means of relief for the 561 NPA and ordered the new NPA boundary line to divide the existing 561 into a northern area and a southern area. The southern area, consisting of the Jupiter, Pahokee, Belle Glade, Boynton Beach, Delray Beach, Boca Raton, and West Palm Beach rate centers, will retain the 561 NPA and the northern area will receive the new relief NPA. After the implementation of the split as ordered by the Commission, the lives of the 561 and the new relief NPAs are projected to be 3.1 and 24.6 years, respectively – a difference of more than 15 years.

Thus, consistent with industry guidelines and FCC rules, NANPA hereby denies the request for a new 561 relief NPA.<sup>6</sup> The Commission may submit to NANPA a request for a relief NPA consistent with industry guidelines or, may appeal the denial to the appropriate governmental/regulatory body consistent with the appeals process set forth in the NPA Assignment Guidelines.<sup>7</sup>

Sincerely,



Ronald R. Conners  
Director – NANPA

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<sup>4</sup> NPA Assignment Guidelines at § 9.2.2.2(a)

<sup>5</sup> “In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 15 years, shall be avoided.” NPA Assignment Guidelines at § 9.2.2.2(h).

<sup>6</sup> As the NPA Code Administrator, NANPA must respond in writing regarding its decision within 30 working days from receipt of the assignment request form in one of four ways: 1) grant the assignment; 2) deny the assignment; 3) require further information; or 4) refer the request to the Industry Numbering Committee (“INC”). NPA Assignment Guidelines at §5.2.

<sup>7</sup> NPA Assignment Guidelines at §8.0.

Ms. Blanca S. Bayo

November 22, 2000

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cc: Charles Keller – FCC  
Yog Varma – FCC  
Diane Griffin-Harmon – FCC  
Cheryl Callahan – FCC  
Thomas C. Foley – NANPA  
Service List