

COPY

MORRISON & FOERSTER LLP

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

ATTORNEYS AT LAW

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

NEW YORK
LONDON
BRUSSELS
BEIJING
HONG KONG
SINGAPORE
TOKYO

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

May 14, 2001

By Overnight Courier

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

010743-TL

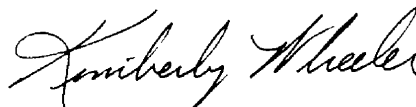
Re: Petition for Approval of NPA Relief Plan for the
407/321 NPA

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies and an electronic copy on diskette of a petition of NeuStar, Inc., as the North American Numbering Plan Administrator and on behalf of the Florida Telecommunications industry. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

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

Respectfully submitted,



Kimberly Wheeler
Counsel for NeuStar, Inc.
North American Numbering Plan
Administrator

Enclosures

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

In re:

Request for Review of Proposed
Numbering Plan Relief for the
407/321 Area Codes

Docket No. _____

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

NeuStar, Inc, in its role as the North American Numbering Plan Administrator (“NANPA”) for Florida under the North American Numbering Plan and acting on behalf of the Florida telecommunications industry (“Industry”),¹ petitions the Florida Public Service Commission (“Commission”)² for approval of the Industry’s consensus decision to implement an all services distributed overlay relief plan for the 407/321 Numbering Plan Areas (“NPA”).³ The Industry submits its recommendation to the Commission based upon NANPA’s projections that absent NPA relief, the supply of central office codes (often

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

² The Federal Communications Commission delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19 (1999).

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

referred to as “CO” or “NXX” codes) for the 407/321 NPAs would exhaust during the second quarter of 2004. In January 2001, NANPA reviewed the forecast and subsequently revised the exhaust date to the fourth quarter of 2003. In order to allow sufficient time for completion of the consensus plan prior to exhaust and to have sufficient 321 CO codes to increase the Brevard County allotment, the Industry requests that the Commission approve its recommended nine-month relief implementation schedule. In support of this Petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

In 1998, the Florida Commission issued an order requiring NANPA and the Industry to implement a split boundary extension concentrated overlay to relieve the 407 NPA.⁴ The plan was implemented in two phases. During the first phase, the 321 NPA was overlaid upon the Orange, Osceola, and Seminole counties and parts of Volusia and Lake Counties. The first phase was completed during December 1999.⁵ During the second phase, Brevard County was split from the 407 NPA and received the 321 NPA. As ordered by the Commission, 381 CO codes were reserved for use in the Brevard County area of the 321

⁴ See Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Supplemental Order on Allocation of NXX Codes For 407 Area Code Relief Plan, Order No. PSC-99-0056-FOF-TL, Docket No. 980671-TL (Jan. 6, 1999). See also Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Notice of Proposed Agency Action Order Modifying 407 Area Code Relief Plan, Order No. PSC-99-0679-FOF-TL, Docket No. 980671-TL (Apr. 6, 1999).

⁵ Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Order Modifying the Implementation Schedule For 407 Area Code Relief Plan, Order No. PSC-99-0384-FOF-TL, Docket No. 980671-TL (Feb. 23, 1999). See also Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Order Granting Limited Extension of Permissive Dialing in the 407 Area Code Relief Plan, Order No. PSC-99-2335-FOF-TL, Docket No. 980671-TL (Dec. 2, 1999).

NPA. The second phase was completed in October 2000. As a result, both the 407 and 321 NPAs serve the Orange, Osceola and Seminole counties and portions of Volusia and Lake Counties. Brevard County is served only by the 321 NPA.

The 2000 COCUS projections for CO code utilization indicated that the 407/321 NPA would exhaust during the second quarter of 2004.⁶ In January 2001, NANPA reviewed the forecast and revised the exhaust date to fourth quarter 2003.⁷ Based upon the projected exhaust date and pursuant to Industry guidelines,⁸ NANPA notified the Commission and the Industry on January 31, 2001 that NPA relief needed to be addressed. NANPA facilitated an Industry meeting in Orlando, Florida on April 3, 2001, to review and discuss relief alternatives for the 407/321 NPA.⁹ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document (“IPD”) prior to the relief planning meeting. The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of three relief alternatives.¹⁰ The relief alternatives evaluated by Industry participants are as follows:

⁶ 2000 COCUS and NPA Exhaust Analysis May 23, 2000 Update (“2000 COCUS”). The 2000 COCUS can be accessed on NANPA’s web site at <<http://www.nanpa.com>>.

⁷ See 2000 COCUS and NPA Exhaust Analysis Changes As of April 4, 2001 (“2000 COCUS Update”). The 2000 COCUS Update can be accessed on NANPA’s web site at <<http://www.nanpa.com>>.

⁸ To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 13, 2000) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

⁹ Attached as Exhibit A is a copy of the April 3, 2001 relief planning meeting minutes.

¹⁰ A copy of the IPD is attached as Attachment #5 to Exhibit A.

- Alternative #1 – An All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. The 321 only NPA covering Brevard County would not be affected. The projected life of Alternative #1 is 5 years. The 321 NPA covering Brevard County is projected to exhaust during the second quarter of 2005.
- Alternative #2 – An All Services Distributed Overlay: A new NPA would be assigned to the same geographic area as the existing 407/321 NPA and the Brevard County portion of the 321 NPA. The projected exhaust of Alternative #2 is 4 years.
- Alternative #3 – An All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. No more CO codes from the 321 NPA would be assigned to that area. The remainder of the CO codes in the 321 NPA would be reserved for use in the Brevard County area. The projected exhaust of Alternative #3 cannot be determined without knowing the date the assignment of 321 CO codes in the 407/321 NPA area will be frozen. However, a range may be provided. The projected lives of Alternative #3 are five years for Area A and four to nine years for Area B, depending upon the implementation date.

At the meeting, the participants discussed the attributes of the various alternatives and reached consensus to recommend Alternative #3, an all services distributed overlay over the 407/321 area. The Industry eliminated from consideration Alternative #1 because the plan provided no relief for Brevard County. The Industry also rejected Alternative #2 because it had the lowest projected life and it would require customers in Brevard County to dial ten digits for local calls.

II. DESCRIPTION OF THE PROPOSED RELIEF PLANS FOR THE 407/321 NPA

The recommended all services distributed overlay alternative for the 407/321 NPA would overlay a new area code over the same geographic area covered by the existing 407/321 NPA. No more CO codes from the 321 NPA would be assigned to that area. The remainder of the CO codes in the 321 NPA would be reserved for use in the Brevard County area. All existing customers in the 407/321 NPA and Brevard County would retain their current ten-digit telephone numbers. In agreement with Federal Communications Commission regulations, customers located within the 407/321 overlay area would maintain ten-digit local dialing both within and across boundaries of the existing NPAs and the new relief NPA.¹¹ Only codes in the new overlay NPA will be assigned after the effective date of the new NPA. The projected lives of Alternative #3 are five years for Area A and four to nine years for Area B, depending upon the implementation date.

The Industry recommends that the Commission adopt the Industry's recommended nine month implementation schedule with the activation of the first code in the new relief NPA occurring no later than the end of the third quarter of 2002. The schedule, provided below, includes recommended implementation intervals for each implementation phase. The recommended nine month schedule is dependent upon the Commission's adoption of the Industry's recommended relief plan and that the 407 NPA will exhaust during the fourth quarter of 2002.

¹¹ 47 C.F.R. § 52.19(c)(3)(ii).

EVENT	TIME INTERVALS IN MONTHS
First New Code in the New Relief NPA is Activated and Assignment of CO Codes in the 321 NPA are Frozen	X (No later than the beginning of the fourth quarter 2002)
Complete Network Preparation	X-1
Begin Network Preparation	X-7
Commission Order	X-9

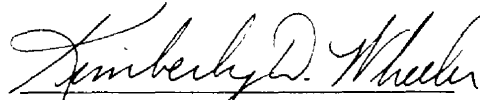
Adhering to the proposed timeframe will help avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 407/321 NPA in Florida to prevent the exhaust of numbering resources. The Industry requests that the Commission approve the Industry's recommended all services distributed relief plan and

implementation schedule for the 407/321 NPA. The Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition.

Respectfully submitted,



Cheryl A. Tritt
Kimberly D. Wheeler

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

Counsel for NeuStar, Inc.
North American Numbering Plan Administrator

May 14, 2001

EXHIBIT A

**MINUTES TO THE APRIL 30, 2001
RELIEF PLANNING MEETING
FOR THE 407/321 NPA (FLORIDA)**

MEETING MINUTES OF FLORIDA
407/321 NPA RELIEF PLANNING INDUSTRY MEETING
TUESDAY, APRIL 3, 2001
Orlando, Florida

WELCOME AND INTRODUCTIONS

Thomas C. Foley, NeuStar NPA Relief Planner, introduced himself and Wayne Milby, Sr. NPA Relief Planner, and welcomed everyone to the 407/321 Relief Planning Meeting. He then asked the attendees to introduce themselves and identify the companies they represented. There were 18 participants at the meeting representing seven different entities (CLECs, ILECs, and Wireless). See Attachment #1 for the names of those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA'S ROLE AND RESPONSIBILITIES

Mr. Foley shared points regarding NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address: www.atis.org/atis/nanpl/nanpreq.htm.

Mr. Foley provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. The list also included the web site addresses of Eastern Region NPA Relief Planning staff members and their contact information.

MINUTES AND STATEMENTS FOR THE RECORD

Tom reviewed the consensus process definition with the participants and emphasized silence was consensus. Tom indicated that minutes of the meeting would only include consensus agreements. He also explained that participants would have an opportunity to make statements for the record, if desired.

The meeting format was reviewed and participants were reminded that the meeting minutes serve as a basis of the filing of the recommended relief plan with the Florida Public Service Commission.

REVIEW OF INDUSTRY GUIDELINES/GENERAL ATTRIBUTES

Mr. Foley briefly reviewed the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Issued 1/27/99). This document can be obtained from the Internet at www.atis.org/atis/clcl/incl/incdocs.htm. In addition, Mr. Foley described the ATIS consensus process and the consensus process described in the industry guidelines.

Mr. Foley reviewed a summary of General NPA Relief Attributes for NPA Splits and NPA Overlays. Refer to Attachment #3.

REVIEW CODE ASSIGNMENT HISTORY FOR 407/321

Mr. Foley reviewed the status of the 407/321 NPAs and NXX code assignment history. See Attachment # 4.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR 407/321

The April 2000 COCUS projected exhaust date is Second Quarter 2004 for the 407/321 NPAs. As a result of NANPA's January 2001 review of the 2000 COCUS the exhaust date was revised to Fourth Quarter 2003.

Mr. Foley reviewed the Initial Planning Document ("IPD") that was prepared and distributed prior to the meeting. See Attachment #5 for a revised copy of the IPD. The IPD proposed and described three relief alternatives for the 407/321 NPAs. The IPD contained detailed maps and the projected lives of each alternative.

Note: The original IPD included Alternatives #4 to #10. Those alternatives were subsequently withdrawn at the request of the originator and with the consensus of the participants on the call to approve the minutes.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 407/321

No additional alternatives were presented by the industry at the meeting.

ASSIGNMENT OF REMAINING 407 NXX CODES

The industry came to consensus that it was in the interest of the industry to first utilize the 407 NXX codes in the 321/407 area and that NANPA should query any applicant who request a 321 code to see if they would consider taking a 407 code.

Subsequent to the call to approve the minutes, NANPA indicated that they would, beginning June 1, 2001, notify applicants requesting 321 NXX codes of the availability of 407 NXX codes.

Also consensus reached to request NANPA send out a notice to the industry on DDS that 407 codes are available.

*Statement for the Record from NANPA
NANPA will need to further investigate the industry request and report back to the industry on the call to approve the minutes of the 321/407 NPA relief meeting.*

At the call to approve the minutes, NANPA indicated that they would announce the availability of 321 NPA codes via NANPA's Document Distribution System.

ELIMINATION OF ALTERNATIVES

Consensus was reached to eliminate the following alternatives for the reasons stated below each alternative:

Alternative #1 Overlay Over Existing 407/321 Area Only

- Does not provide relief for the Brevard County

Alternative #2 Overlay Over All 407/321 and 321 (Brevard County)

- Forces 10 digit dialing for Brevard County after they previously took an area code change to keep 7 digit dialing
- Least life of all alternatives

CONSENSUS ON A RELIEF ALTERNATIVE

Consensus was reached to recommend Alternative #3, a distributed overlay, to the Florida Public Service Commission as the relief plan for NPA 407/321. The date NPA 321 codes are to be frozen is the date the relief NPA is implemented.

*Statement for the record from Sprint LTD
Sprint LTD opposes freezing assignment in 321 in the 407/321 overlay area, to allow existing 321 customers the flexibility of having additional 321 numbers.*

CONSENSUS ON A DIALING PLAN

Consensus was reached to maintain the existing dialing plan.

CONSENSUS ON IMPLEMENTATION INTERVALS

Consensus was reached to recommend the Florida PSC allow a nine month implementation interval with the new code activation no later than the end of the 3Q2002. Please see Attachment #6.

INDUSTRY COMMITMENT FOR A TEST NUMBER

The participants reached consensus not to secure a commitment for a test number at this time but to wait until the Implementation Meeting.

CONSENSUS ON NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Industry participants reached consensus to have NANPA file, on behalf of the industry, the results of the industry efforts regarding the 407/321 NPAs relief in the form of a formal petition for relief with the Florida Public Service Commission. The NANPA will file the recommendation on May 15, 2001.

SET DATE FOR CONFERENCE CALL TO APPROVE MINUTES

Consensus was reached that the draft minutes and draft filing from this meeting will be distributed to the industry on or before May 1, 2001. Additionally, a conference call will be held on Tuesday May 8, 2001 at 2:00 p.m. ET to address open issues and to review and approve the draft filing and meeting minutes. The dial in number is (847) 619-6648; the access code is 6271827#.

On the May 8, 2001 conference call, the Industry, by consensus, approved the minutes as amended.

Attachment #1

MEETING MINUTES OF THE FLORIDA 407/321 NPA RELIEF PLANNING INDUSTRY MEETING TUESDAY APRIL 3, 2001 Orlando, Florida

Attendees

David Campbell	Smart City Telecom
Bob Casey	FL PSC
John Craver	Sprint
Reva Flaherty	BellSouth Telecommunications
Thomas Foley	NeuStar, Inc., NANPA
Lee Gatzke	SBC Telecom
Barbara Green	Sprint
Stan Greer	BellSouth Communications
Anne Henderson	ATT
Levent Ileri	FL PSC
Jeannie Johnson	Sprint
Charles Lewis	BellSouth Telecommunications
Douglas A. McCullough	BellSouth Telecommunications
John McLaughlin	KMC Telecom
Wayne Milby	NeuStar, Inc., NANPA
Mark Parrish	BellSouth Telecommunications
Pamela Ringold	Sprint
Bill Sawyer	BellSouth Telecommunications
Dana Smith	Verizon Wireless
John Snyder	Sprint

Attachment #2
FLORIDA 321/407 NPA RELIEF
INDUSTRY MEETING
Tuesday April 3, 2001

Renaissance Orlando Resort
6677 Sea Harbor Drive
Orlando, FL 32821
(407) 351-5555

AGENDA

8:30	Registration
8:45	Welcome and Introductions
8:55	NANPA Role and Responsibilities
9:05	Minutes and "Statements For The Record"
9:15	Industry Guidelines/General Attributes
9:25	Review Code Assignment History
9:40	Review Initial Planning Document (IPD)
10:15	Break
10:30	Review Initial Planning Document (IPD)
11:00	Additional Alternatives from Industry
11:45	Lunch (On Your Own)
12:45	Elimination Of Alternatives
1:00	Consensus On Relief Alternative
2:15	Consensus on Dialing Plan
2:30	Break
2:45	Consensus on Implementation Intervals
3:15	Industry Commitment For Test Number
3:30	Consensus on NANPA Filing Industry Efforts With Commission
3:40	Statements For the Record
3:45	Set Date For Conference Call To Approve Minutes
3:55	Complete NANPA Survey
4:00	Adjourn

Attachment #3

General NPA Relief Alternative Attributes

Splits

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Implementation is generally understood.
- Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.
- Geographic splits permit 7-digit dialing within an area code.
- Stationery, business cards and advertising containing a ten-digit phone number will need to be revised by customers receiving the new area code.
- Future splits will reduce the geographic size of the area code.

Overlays

General Attributes of Overlays

- With an overlay there will be more than one area code in a geographic area. Where the overlay is a new concept some customer education is desirable.
 - An overlay will not require existing customers to change their area code.
 - An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls
 - There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
 - An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.
-
-

General NPA Relief Alternative Attributes

Overlays

General Attributes of Concentrated Growth Overlays

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

Attachment #4

407/321 NPA NXX Code Summary

<u>NPA</u>	<u>407</u>	<u>321 OOS</u>	<u>321 Brevard</u>
Assigned NXXs	555	165	184
Protected NXXs	15	0	0
Reserved NXXs	0	0	0
Unavailable NXXs (See Note)	34	19	0
Available NXXs	196	235	197
 Total	 800	 419	 381

<u>Service Providers:</u>	<u>407</u>	<u>321</u>
ILEC	4	3
CLEC	22	35
CAP	2	0
Interexchange Carrier	0	0
Wireless	21	12
Reseller	2	2

<u>Codes assigned NPA 321</u>	<u>Jan-00</u>	<u>Feb-00</u>	<u>Mar-00</u>	<u>Apr-00</u>	<u>May-00</u>	<u>Jun-00</u>
	6	13	15	31	13	12
<u>Jul-00</u>	<u>Aug-00</u>	<u>Sep-00</u>	<u>Oct-00</u>	<u>Nov-00</u>	<u>Dec-00</u>	
	17	8	13	17	17	7
<u>Jan-01</u>	<u>Feb-01</u>					
	17	1				
<u>Codes assigned NPA 407</u>	<u>Jan-00</u>	<u>Feb-00</u>	<u>Mar-00</u>	<u>Apr-00</u>	<u>May-00</u>	<u>Jun-00</u>
	0	0	0	0	0	1
<u>Jul-00</u>	<u>Aug-00</u>	<u>Sep-00</u>	<u>Oct-00</u>	<u>Nov-00</u>	<u>Dec-00</u>	
	0	0	0	0	0	0
<u>Jan-01</u>	<u>Feb-01</u>					
	4	1				

Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing cross NPA boundary).

Attachment #5

Initial Planning Document

For Relief of Florida 321/407 NPAs

**April 2000 NEP Projected Exhaust Date 2Q2004
January 2001 Revised Exhaust Date 4Q2003**

North American Numbering Plan Administration

Thomas C. Foley
NPA Relief Planner – Eastern Region

321/407 NPA Relief Alternatives

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR FLORIDA 407/321

<i>COCUS DATE:</i>	<i>April 1, 2000</i>
<i>Revised</i>	<i>January 2001</i>
<i>PROJECTED EXHAUST DATE:</i>	<i>4th Quarter 2003</i>
<i>AVERAGE ANNUAL CODE GROWTH:</i>	<i>144</i>
<i>AVERAGE MONTHLY NXX GROWTH:</i>	<i>12</i>
<i>LERG DATA:</i>	<i>January 1, 2001</i>

Alternatives

Alternative # 1

Overlay Over Existing 407/321 Area Only

A new NPA code would be assigned to the same geographic area as the existing 321/407 NPA: Orange, Osceola, Seminole and part of Volusia Counties. Customers would retain their current telephone numbers; ten-digit local dialing by all customers between and within area codes in the area covered by the new code would continue. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 407/321 NPA all code assignments will be made in the new overlay area code.

Brevard County (321 NPA alone) would exhaust in 2Q2005 when its allotment of 381 NXX codes is consumed. No activity is included for this area with this alternative.

Codes at Relief in 321 NPA = 367*

Codes at Relief in 407 NPA = 748

Total Codes at Exhaust 1115

Area code life = 5 years

* This number is net of the 381 NXX codes from the 321 NPA held out for Brevard County.

321/407 NPA Relief Alternatives

Alternative # 2

Overlay Over All 407/321 and 321(Brevard County)

This Alternative would place a new NPA code over the entire 407/321 and 321 Areas: Brevard, Orange, Osceola, Seminole and part of Volusia Counties. Ten-digit dialing of local calls would be implemented in the areas where it does not currently exist. Codes in the new overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 407 and 321 NPAs all code assignments will be made in the new overlay area code. The entire area would now have a single exhaust date in the future. The Brevard area would have 321 and the new NPA(s) and the Orange, Osceola, Seminole, and part of Volusia Counties would have 407/321 and the New NPA(s); the 407 NPA would not be extended into the Brevard County area.

Total codes at Relief = 1496

Area code life in years = 4 with the introduction of one new NPA

8 with the introduction of two new NPAs

Alternative # 3

Freeze 321 NPA in Central Area

This Alternative would hold the growth of 321 NXX codes in Area "A" to the level at relief. The remainder 321 codes would be held for use in the Brevard County area. A new NPA code would be added to Area "A". Ten-digit local dialing by all customers between and within area codes in Area "A" would continue. Codes in the new overlay NPA will be assigned upon request with the effective date of the new area code. Codes in the 321 NPA in Area "A" will be "frozen".

Projecting the life of the areas is impossible without knowing the actual date of relief since the number of available NXX codes to be available to the Brevard County area (Area "B") is dependant on how many are used prior to the relief date. Relief must be provided earlier to assure sufficient codes to extend the life of the Brevard County portion of the NPA.

Codes at Relief in Area "A" = 1115 to 890

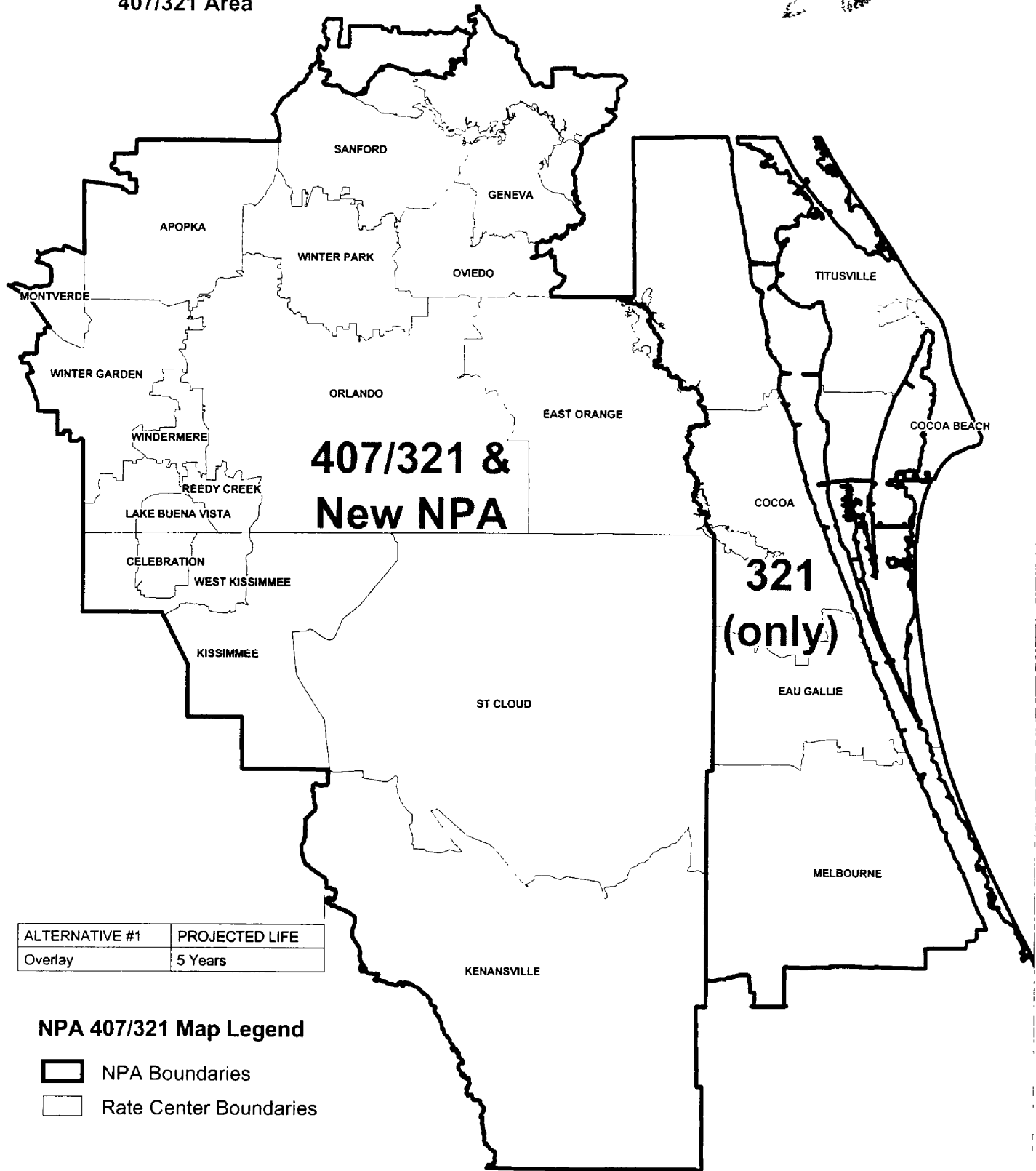
Codes at Relief in Area "B" = 431 to 175

Area code life Area "A" = 5 years

Area "B" = 4 to 9 years



Note: The original IPD included Alternatives #4 to #10. Those alternatives were subsequently withdrawn at the request of the originator and with the consensus of the participants on the call to approve the minutes.

NPA 407/321 Rate Center Map
 Alternative #1
 Overlay Over Existing
 407/321 Area

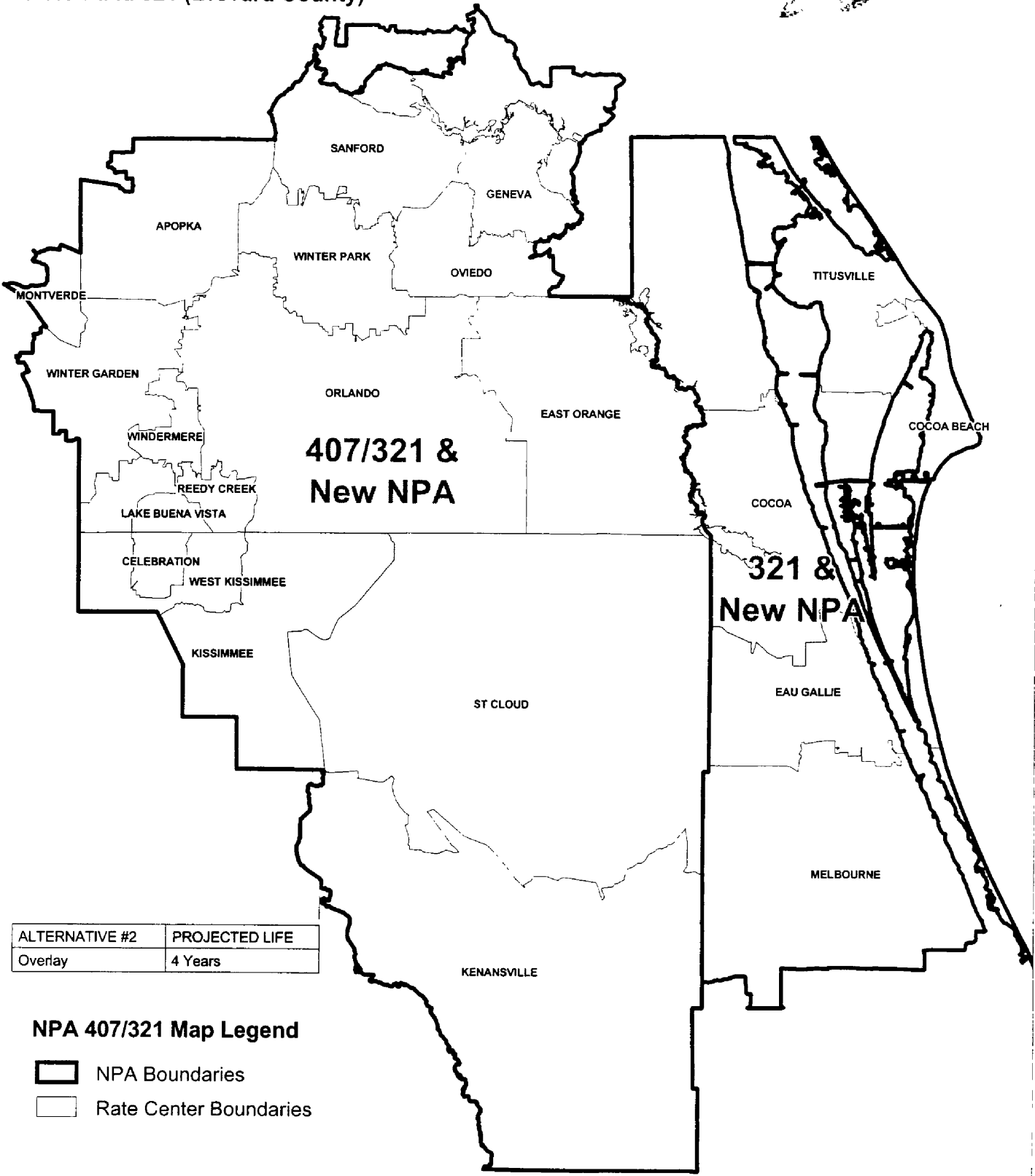


ALTERNATIVE #1	PROJECTED LIFE
Overlay	5 Years

NPA 407/321 Map Legend



-  NPA Boundaries
-  Rate Center Boundaries

**NPA 407/321 Rate Center Map
 Alternative #2
 Overlay Over All
 407/321 and 321 (Brevard County)**

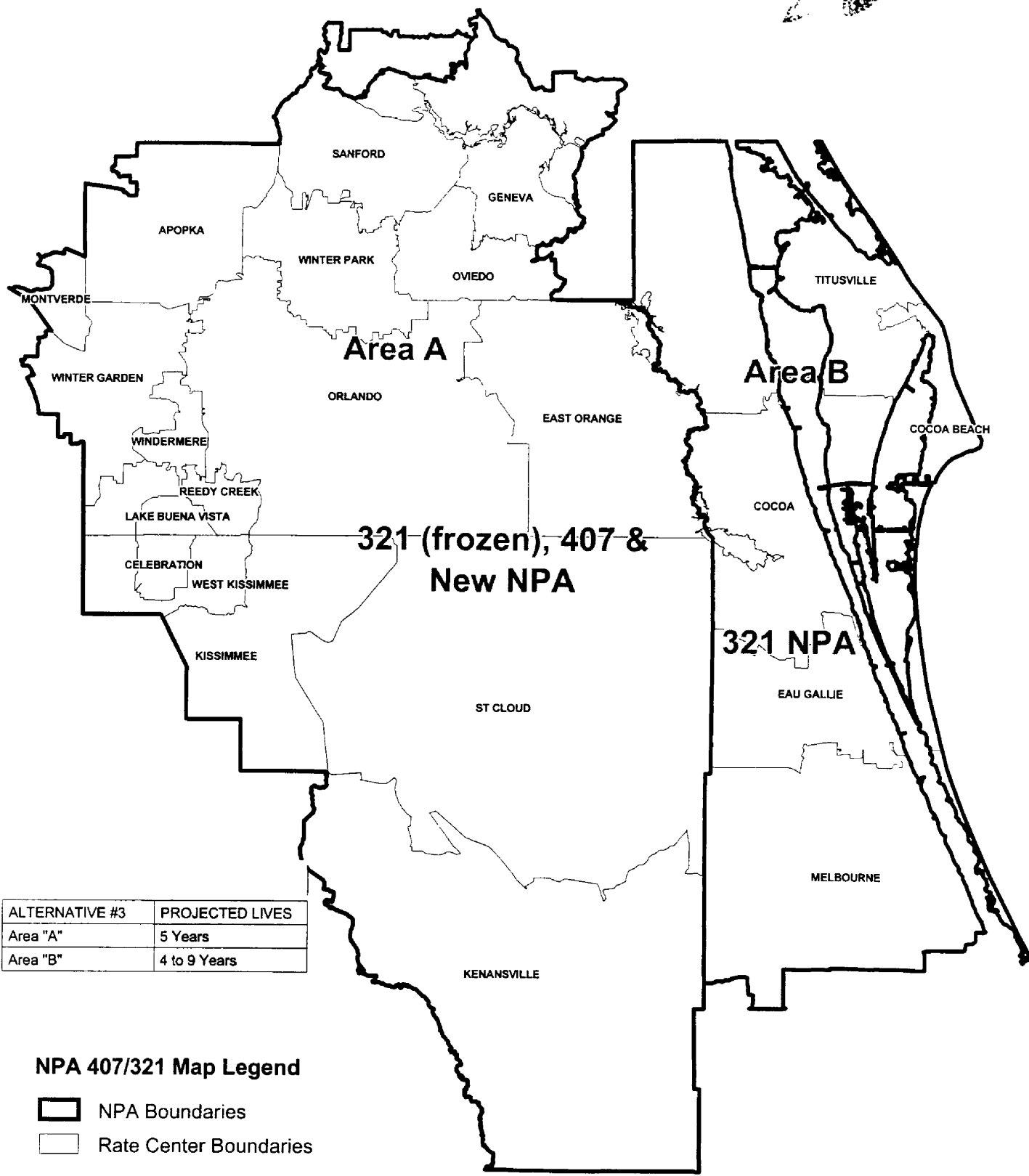


ALTERNATIVE #2	PROJECTED LIFE
Overlay	4 Years

NPA 407/321 Map Legend



-  NPA Boundaries
-  Rate Center Boundaries

**NPA 407/321 Rate Center Map
Alternative #3
Freeze 321 NPA in Central Area**



ALTERNATIVE #3	PROJECTED LIVES
Area "A"	5 Years
Area "B"	4 to 9 Years

NPA 407/321 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries

FLORIDA 321 and 407 NPA ALTERNATIVES

PROJECTED LIVES OF RELIEF ALTERNATIVES

STANDARD LIVES

<u>Alternative</u>	<u>Area A</u>	<u>Area B</u>
#1		5
#2		4
#3	5	4 to 9

Attachment #6

Recommended Implementation Intervals

Florida 321/407 NPA Relief

Event	Time Interval (in Months)	Date Suggested
New Code Implemented (321 Freeze)	X	NLT 4Q2002 (Note 1)
Network preparation complete	X-1	
Begin Network Preparation	X-7	
Commission Order	X-9	

Notes: 1. This date assumes an NPA exhaust Fourth Quarter 2003 and represents the beginning of the period.