

**COPY**

**NEU STAR**

October 3, 2001

*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. 010743-TL

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies and an electronic copy on diskette of the Pre-Filed Direct Testimony of Thomas C. Foley on behalf of NeuStar, Inc., the North American Numbering Plan Administrator.

Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Kimberly Wheeler Miller  
Regulatory Policy Counsel  
NeuStar, Inc.

NEUSTAR, INC.  
1120 Vermont Avenue, N.W.  
Suite 400  
Washington, DC 20005  
Phone 202 533 2600  
Fax 202 533 2975

DOCUMENT NUMBER-DATE

12606 OCT-4 01

FPSC-COMMISSION CLERK

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

In re: Petition for Review of Proposed  
Numbering Plan Relief for the 407/321 Area  
Codes by NeuStar, Inc., as North American  
Numbering Plan Administration (NANPA), on  
Behalf of the Florida Telecommunications  
Industry

Docket No. 010743-TL

PRE-FILED DIRECT TESTIMONY OF THOMAS C. FOLEY  
ON BEHALF OF  
NEUSTAR, INC.

Filed  
October 4, 2001

**Pre-Filed Direct Testimony of  
Thomas C. Foley  
On Behalf of NeuStar, Inc.**

1           **QUALIFICATIONS**

2    Q.    Please state your name and business address.

3    A.    My name is Thomas C. Foley. My business address is NeuStar, Inc., 1120  
4           Vermont Ave N.W., Suite 400, Washington, DC 20005

5

6    Q.    With whom are you employed, and in what capacity?

7    A.    I have been employed by NeuStar, Inc. (“NeuStar”) as a Numbering Plan Area  
8           (“NPA”) Relief Planner for the Eastern Region of the North American Numbering  
9           Plan since August 9, 1999. NeuStar is the North American Numbering Plan  
10          Administrator (“NANPA”). The NANPA and other numbering functions were  
11          transferred from Lockheed Martin IMS to NeuStar on November 30, 1999. As an  
12          NPA Relief Planner, I am a member of a group within NANPA that initiates NPA  
13          relief planning in NPAs within the Eastern Region of the United States in  
14          sufficient time to prevent the exhaust of numbering resources. My responsibilities  
15          include monitoring central office (“CO”) code utilization trends and collecting  
16          other information in order to project NPA exhaust, notifying the industry and  
17          appropriate regulatory bodies of the need for NPA relief planning, and conducting  
18          relief planning meetings with the telecommunications industry. Once the industry  
19          has agreed to recommend a relief plan, I prepare and forward the industry’s  
20          recommendations to the appropriate regulatory agency, then provide notification  
21          of agency approved relief plans to the industry in accordance with the NPA Code

1 Relief Planning & Notification Guidelines (INC 97-0404-016, July 2, 2001)

2 (“NPA Relief Planning Guidelines”).

3

4 Q. Please describe your educational background and professional experience in the  
5 telecommunications industry.

6 A. I have a Bachelors of Science Degree in Electrical Engineering from the  
7 University of Nebraska - Lincoln and a Masters of Business Administration from  
8 Roosevelt University in Chicago. I also have a Masters Certificate in Project  
9 Management from George Washington University. I have attended numerous  
10 telecommunications industry schools and forums on engineering, management,  
11 and project management.

12

13 I have been employed in the telecommunications industry for more than twenty-  
14 seven years. Prior to joining NANPA, I was employed by Sprint Corporation and  
15 its predecessor companies. During my employment with Sprint, I held positions  
16 in Engineering, Strategic Market Planning, Technology Planning, and Operations.  
17 In my most recent previous position with Sprint, I managed large complex  
18 interdepartmental projects such as NPA relief activities. I managed numbering  
19 related projects for Sprint from 1988 to 1999, including the implementation of  
20 interchangeable NPA and CO codes and local number portability.

21

1 I also teach mathematics, statistics, project management, and general management  
2 courses at both the undergraduate and graduate level at the University of Phoenix.

3

4 Q. Have you ever appeared as a witness before the Florida Public Service  
5 Commission (“Commission”) before?

6 A. Yes. I appeared as a witness on behalf of NeuStar in numerous NPA relief  
7 proceedings.

8

9 **PURPOSE OF TESTIMONY**

10 Q. What is the purpose of your testimony?

11 A. I offer this testimony to explain NANPA’s role in the instant NPA relief  
12 proceeding pursuant to the NPA Relief Planning Guidelines.

13

14 **NANPA’s ROLE IN THE NPA RELIEF PROCESS**

15 Q. Please describe NANPA’s role in this proceeding.

16 A. The 2000 Central Office Code Utilization Survey and NPA Exhaust Analysis,  
17 May 19, 2000 Update (“2000 COCUS”) projections for CO codes indicated that  
18 the 407/321 NPA (Central Florida) is expected to exhaust during the second  
19 quarter of 2004. To allow sufficient time to prepare for NPA relief to prevent  
20 exhaust in the 407/321NPA, NANPA notified industry members and the  
21 Commission on January 31, 2001 that NPA relief planning for the 407/321 NPA  
22 needed to be addressed.

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

On April 3, 2001, NANPA facilitated an industry meeting in Orlando, Florida to present NPA relief alternatives to the industry and to ultimately allow industry members to come to consensus on a relief plan to be presented to the Commission. A copy of the meeting minutes is attached as Exhibit A to Exhibit #1. 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 set forth three proposed relief alternatives. All three alternatives considered by the Industry were variations of an all services distributed overlay.

At the April 3, 2001 meeting, the industry extensively discussed the relief alternatives and reached consensus to recommend to the Commission Alternative #3, an all-services distributed overlay over the 407/321 area, as the preferred form of relief for the 407/321 NPA. The alternative includes a “freeze” of central office code assignments from the portion of the 321 NPA encompassing the 407 NPA. On May 15, 2001, NANPA filed a petition with the Commission on behalf of the industry requesting the Commission’s approval of the industry’s recommended relief plan.

Q. Who comprises the Industry to which you refer?

1 A. The Industry is comprised of those current and prospective telecommunications  
2 carriers operating in, or considering operations in, the 407/321 area code of  
3 Central Florida. The attendees of the April 3, 2001 meeting are listed in the  
4 Meeting Minutes, attached as Exhibit A, Attachment #1 to Exhibit #1.

5  
6 Q. You referred to the "2000 COCUS" and indicated that relief was needed in the  
7 second quarter of 2004. Has NANPA revised this estimate?

8  
9 A. Yes, the projection available at the time of the NPA Relief Meeting in April 2001  
10 was for second quarter 2004. Subsequently, NANPA, as part of its business  
11 operations, published the 2001 NRUF and NPA Exhaust Analysis, the successor  
12 of the COCUS, on June 1, 2001. The revised exhaust date is now the first quarter  
13 2004.

14  
15 **RELIEF ALTERNATIVES**

16 Q. Please describe the alternative plans of relief set forth in the IPD and the projected  
17 lives of each.

18 A. In Alternative #1, an version of an all services distributed overlay, a new NPA  
19 code would be assigned to the same geographic area as the existing 407/321 NPA.  
20 The portion of the 321 NPA covering Brevard County would not be affected. The  
21 projected life of Alternative #1 is 5 years. The 321 NPA covering Brevard  
22 County is projected to exhaust during the second quarter of 2005.

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

In Alternative #2, another version of 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.

In Alternative #3, the third all services distributed overlay proposal, 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 the 407/321 NPA area and four to nine years for the Brevard County area, depending upon the implementation date.

Q. What do you mean by “depending upon the implementation date”?

A. The earlier that 321 NPA code assignments are frozen in the 407/321 NPA area, the more NXX codes will be available for use in the Brevard County area. This number is dependant upon when the implementation is ordered.



1           **INDUSTRY CONSENSUS**

2       Q.     Did the industry reach consensus on a relief implementation schedule to  
3           recommend to the Commission?

4       A.     Yes. The industry agreed, by consensus, to recommend to the Commission  
5           Alternative #3.

6

7       Q.     Did the industry reach consensus on a relief implementation schedule to  
8           recommend to the Commission?

9       A.     Yes. Industry participants reached consensus to recommend to the Commission a  
10          schedule for NPA relief implementation. The industry recommends an  
11          installation interval of nine months, with first code activation in the new NPA no  
12          later than the beginning of the fourth quarter 2002. This Industry's recommended  
13          interval implementation schedule depends upon the Commission's adoption of  
14          Alternative #3.

15

16      Q.     Does this conclude your testimony?

17      A.     Yes, it does.

## CERTIFICATE OF SERVICE

I, Kimberly Wheeler Miller, do hereby certify that the foregoing **PRE-FILED DIRECT TESTIMONY** was delivered, by First Class Mail, or facsimile where indicated, on this 3<sup>rd</sup> day of October, 2001, to the following:

Bob Neely  
Alarm Association of Florida, Inc.  
1802 North University Drive #329  
Plantation, FL 33322-4115

James Meza III/Nancy B. White  
BellSouth Telecommunications, Inc. (Mia)  
150 West Flagler St., Suite 1910  
Miami, FL 33130

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

Michael A. Gross  
Florida Cable Telecommunications Assoc., Inc.  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Angela Green, General Counsel  
Florida Public Telecommunications Assoc.  
2292 Wednesday Street  
Tallahassee, FL 32308-4334

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

Patrick Wiggins/Natalie Futch  
Katz, Kutter Law Firm  
12th Floor  
Tallahassee, FL 32301

Floyd R. Self, Esq.  
Messer Law Firm  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Thomas C. Foley  
NeuStar, Inc.  
820 Riverbend Blvd.  
Longwood, FL 32779

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

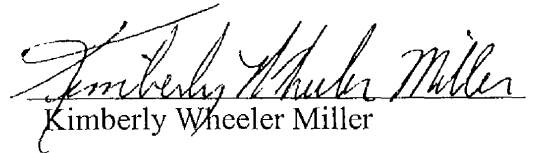
Mr. F. B. (Ben) Poag  
Sprint-Florida, Incorporated  
(MC FLTLHO0107)  
Tallahassee, FL 32316-2214

Ms. Carolyn Marek  
Time Warner Telecom of Florida, L.P.  
% Time Warner Telecom  
Franklin, TN 37069-4002

Marry Curran  
VCOG  
1190 Pelican Bay Drive  
Daytona Beach, FL 32119-1381

Anne Hoskins  
Verizon Wireless  
180 Washington Valley Road  
Bedminster, NJ 07921

Frank Gummey, III, Robert M. Weiss  
Volusia County  
123 W. Indiana Ave.  
DeLand, FL 32720-4613

  
Kimberly Wheeler Miller

# EXHIBIT #1

MORRISON & FOERSTER LLP STAMP & RETURN

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

ATTORNEYS AT LAW

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

NEW YORK  
LONDON  
BRUSSELS  
BEIJING  
HONG KONG  
SINGAPORE  
TOKYO

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

May 14, 2001

By Overnight Courier

010743-TL

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

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

dc-262631



DOCUME... DATE  
06042 MAY 15 2001  
FEDERAL BUREAU OF RECORDS

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”),<sup>1</sup> petitions the Florida Public Service Commission (“Commission”)<sup>2</sup> 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”).<sup>3</sup> The Industry submits its recommendation to the Commission based upon NANPA’s projections that absent NPA relief, the supply of central office codes (often

---

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

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

<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup> 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

---

<sup>4</sup> 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).

<sup>5</sup> 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.<sup>6</sup> In January 2001, NANPA reviewed the forecast and revised the exhaust date to fourth quarter 2003.<sup>7</sup> Based upon the projected exhaust date and pursuant to Industry guidelines,<sup>8</sup> 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.<sup>9</sup> 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.<sup>10</sup> The relief alternatives evaluated by Industry participants are as follows:

---

<sup>6</sup> 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>>.

<sup>7</sup> 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>>.

<sup>8</sup> 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>>.

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

<sup>10</sup> 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.<sup>11</sup> 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.

---

<sup>11</sup> 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

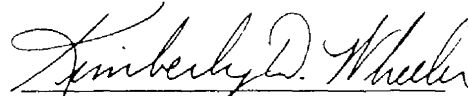
Adhering to the proposed timeframe will help avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

### 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/nanplnanpreq.htm](http://www.atis.org/atis/nanplnanpreq.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/inclincdocs.htm](http://www.atis.org/atis/clcl/inclincdocs.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

Overlays

---

---

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.

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>4<sup>th</sup> 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

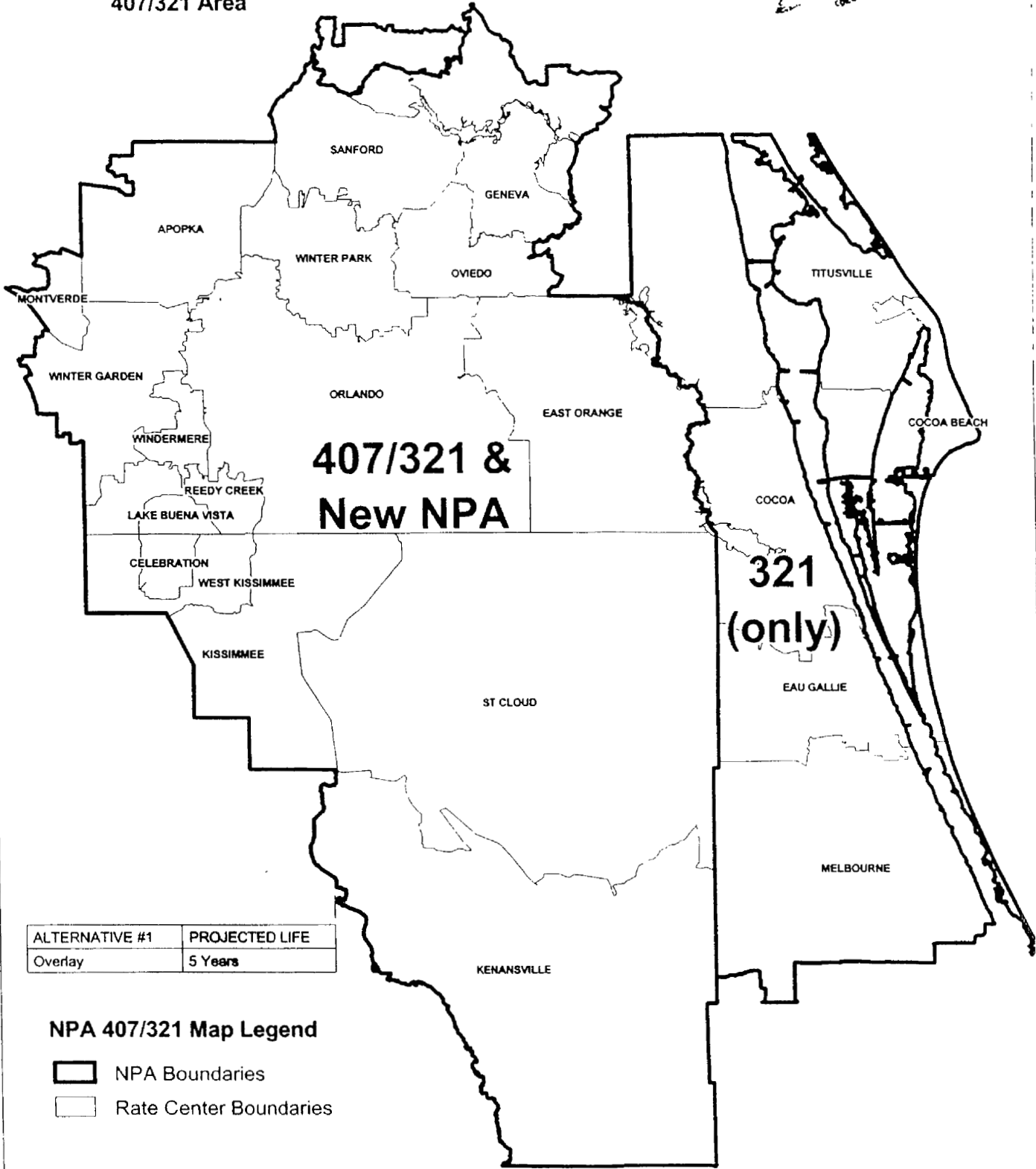
Codes at Relief in Area "B" = 431 to 175

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.*

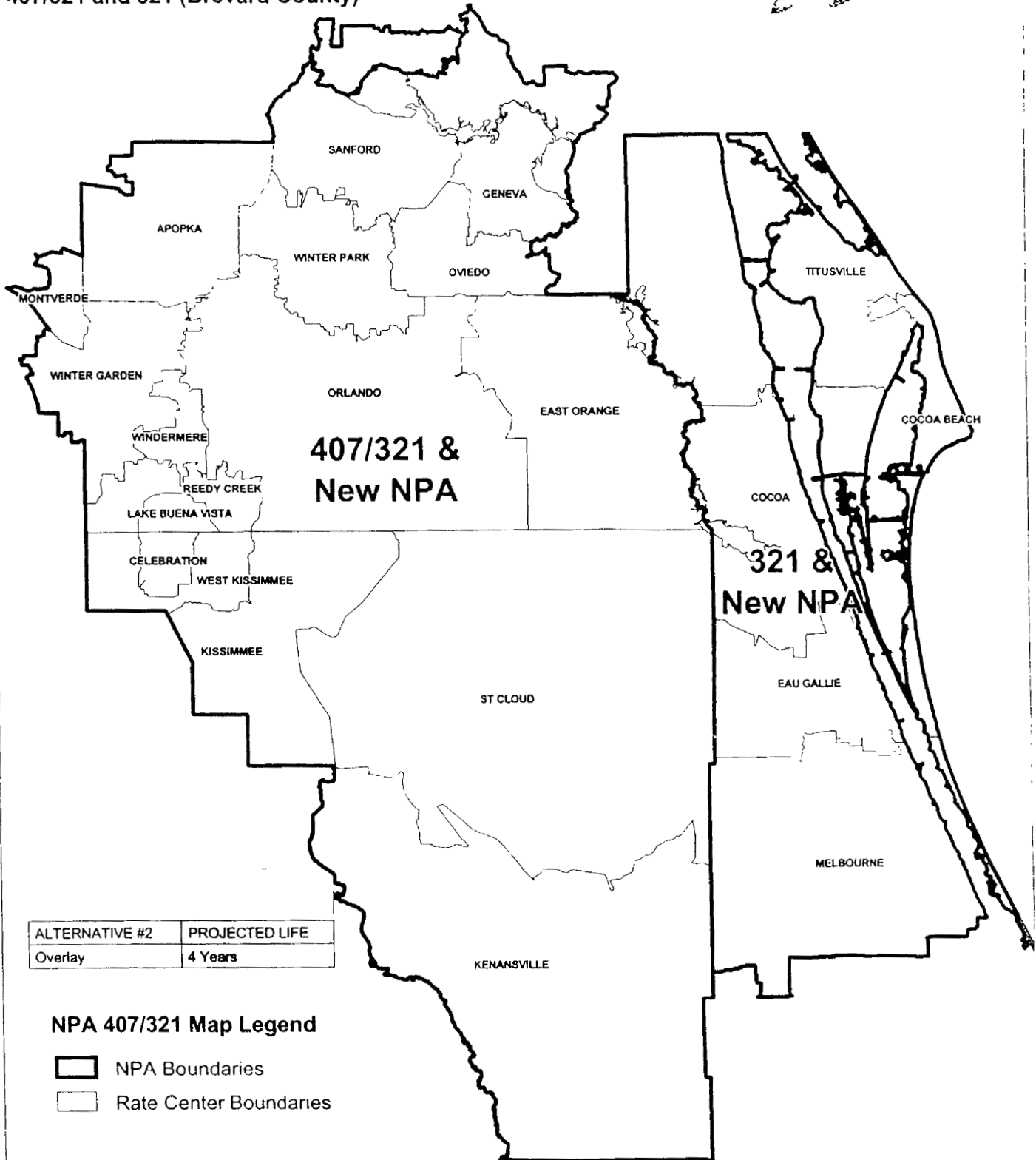
NPA 407/321 Rate Center Map  
 Alternative #1  
 Overlay Over Existing  
 407/321 Area



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)

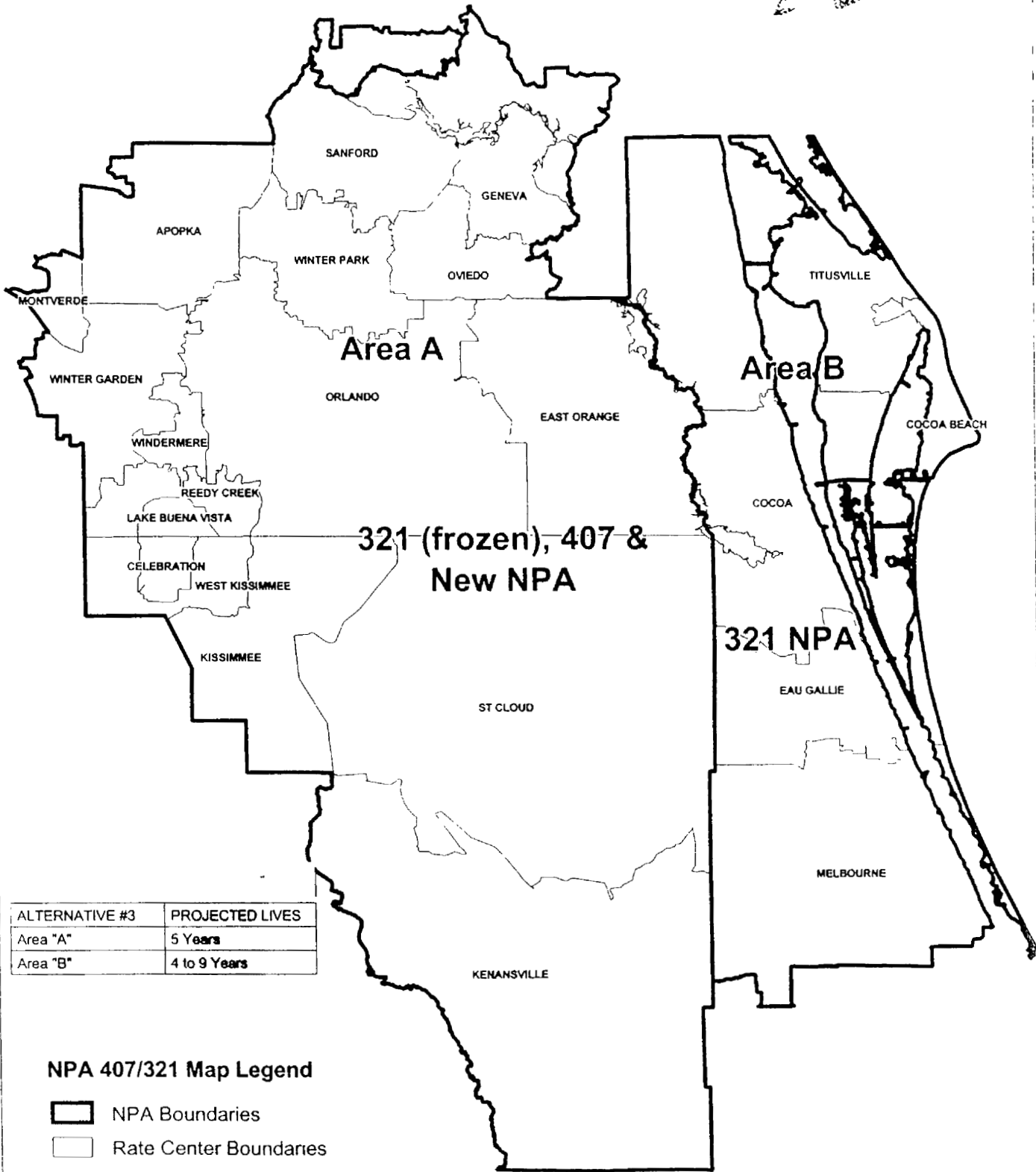


ALTERNATIVE #2	PROJECTED LIFE
Overlay	4 Years

**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.

## CERTIFICATE OF SERVICE

I, Kimberly Wheeler Miller, do hereby certify that the foregoing **PRE-FILED DIRECT TESTIMONY** was delivered, by First Class Mail, or facsimile where indicated, on this 3<sup>rd</sup> day of October, 2001, to the following:

Bob Neely  
Alarm Association of Florida, Inc.  
1802 North University Drive #329  
Plantation, FL 33322-4115

James Meza III/Nancy B. White  
BellSouth Telecommunications, Inc. (Mia)  
150 West Flagler St., Suite 1910  
Miami, FL 33130

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

Michael A. Gross  
Florida Cable Telecommunications Assoc., Inc.  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Angela Green, General Counsel  
Florida Public Telecommunications Assoc.  
2292 Wednesday Street  
Tallahassee, FL 32308-4334

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

Patrick Wiggins/Natalie Futch  
Katz, Kutter Law Firm  
12th Floor  
Tallahassee, FL 32301

Floyd R. Self, Esq.  
Messer Law Firm  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Thomas C. Foley  
NeuStar, Inc.  
820 Riverbend Blvd.  
Longwood, FL 32779

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

Mr. F. B. (Ben) Poag  
Sprint-Florida, Incorporated  
(MC FLTLHO0107)  
Tallahassee, FL 32316-2214

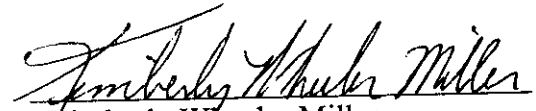
Ms. Carolyn Marek  
Time Warner Telecom of Florida, L.P.  
% Time Warner Telecom  
Franklin, TN 37069-4002

Marry Curran  
VCOG  
1190 Pelican Bay Drive  
Daytona Beach, FL 32119-1381



Anne Hoskins  
Verizon Wireless  
180 Washington Valley Road  
Bedminster, NJ 07921

Frank Gummey, III, Robert M. Weiss  
Volusia County  
123 W. Indiana Ave.  
DeLand, FL 32720-4613

  
Kimberly Wheeler Miller