



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-

RECEIVED 11:30  
03 JAN -9 AM 10:59  
COMMISSIONER  
CLERK

DATE: JANUARY 9, 2003

TO: DIRECTOR, DIVISION OF THE COMMISSION  
ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (CASEY, *102*  
*n* ILLERI, BULECZA-BANKS *MSB*  
OFFICE OF GENERAL COUNSEL (TAYLOR) *BRG*

RE: DOCKET NO. 030010-TL - REQUEST BY ORLANDO REGIONAL  
HEALTHCARE FOR A NEW 321 NXX CODE IN THE ORLANDO AREA

DOCKET NO. 010743-TL - PETITION FOR REVIEW OF PROPOSED  
NUMBERING PLAN RELIEF FOR THE 407/321 AREA CODES BY  
NEUSTAR, INC., AS NORTH AMERICAN NUMBERING PLAN  
ADMINISTRATOR, ON BEHALF OF FLORIDA TELECOMMUNICATIONS  
INDUSTRY.

AGENDA: 01/21/03 - REGULAR AGENDA - PROPOSED AGENCY ACTION -  
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: DOCKET NO. 010743-TL HAS BEEN RE-ASSIGNED  
TO THE FULL COMMISSION PANEL FOR PURPOSES  
OF THIS DECISION

FILE NAME AND LOCATION: S:\PSC\CMP\WP\030010.RCM

CASE BACKGROUND

On December 20, 2002, the Commission received a letter from Orlando Regional Healthcare (ORH) requesting assistance in the implementation of its Metro area dialing plan (MADP). ORH serves the healthcare needs of the entire Central Florida Region with nine major facilities and more than 75 smaller facilities including Arnold Palmer Hospital for Children & Women, M. D. Anderson Cancer Center Orlando, Orlando Regional Medical Center, Orlando Regional Lucerne Hospital, Orlando Regional Sand Lake Hospital, Orlando

DOCUMENT NUMBER-DATE

00275 JAN-98

FPSC-COMMISSION CLERK

DATE: January 9, 2003

Regional South Seminole Hospital, Orlando Regional St. Cloud Hospital, Leesburg Regional Medical Center, South Lake Hospital, ORH Foundation, Health Research Institute, Graduate Medical Education, Orlando Regional Visiting Nurse Association, and Westminster Care of Orlando.

ORH has designed and built a telecommunications system centered on a Nortel SL100 (DMS100) switch and a former BellSouth Central Office. The telecommunications system connects to all of the major campuses via a Synchronous Optical Network (SONET) ring. SONET is an optical interface standard that allows interworking of transmission products from multiple vendors. With this infrastructure, ORH has the ability to distribute telephone calls, move telephone service, and transfer connectivity anywhere in the corporation without the use of Telco provided lines.

This infrastructure and the MADP enables ORH to achieve three major objectives:

1. ORH provides the customer with a single access point and simple call routing simplifying the customer interface and improving the customer experience.
2. It reduces the overall cost of telecommunication services by over \$1M per year which in turn drives down the cost of healthcare to Florida consumers.
3. It increases ORH's ability to move healthcare services around within the community without changing access numbers or incurring expenses to forward numbers.

ORH would like a 321 NXX (first three digits of a seven-digit phone number) code to complete its MADP. However, Commission Order No. PSC-02-0405-FOF-TL, issued March 25, 2002, prohibits the issuing of any additional 321 NXXs in the overlay area of 407/321. This recommendation addresses ORH's request for an additional 321 NXX code.

DATE: January 9, 2003

DISCUSSION OF ISSUES

**ISSUE 1:** Should the Commission direct the North American Numbering Plan Administrator (NANPA) to issue a 321 NXX to BellSouth Telecommunications, Inc. (BellSouth) for ORH's use in the Orlando area?

**RECOMMENDATION:** Yes, the Commission should direct NANPA to issue a 321 NXX code to BellSouth for ORH's use in the Orlando area. (CASEY, ILERI, BULECZA-BANKS)

**STAFF ANALYSIS:** In the year 2000, ORH requested two 407 Numbering Plan Area (NPA or area code) blocks from its service provider, BellSouth, to institute its new MADP. At that time, BellSouth advised ORH that there were no 407 NXX blocks available, however, its request could be met using two NXXs from the new 321 area code. Subsequently, ORH was provided the 321/841, and 321/843 NXX codes through BellSouth.

In mid 2002, after realizing that one more 321 NXX code was needed to complete the integration of its MADP, ORH requested that BellSouth provide another 321 NXX. BellSouth advised ORH that no more 321 NXX codes were available for the Orlando area due to Commission Order No. PSC-02-0405-FOF-TL, issued March 25, 2002, which implemented area code relief for the 407/321 area codes. The Order stated:

Alternative #3, an all services distributed overlay shall be implemented. A new NPA code shall be assigned to the same geographic area as the existing 407/321 area code. No more central office (CO or NXX) codes from the 321 NPA shall be assigned to that area. The remainder of the CO codes in the 321 NPA shall be reserved for use in the Brevard County area.

BellSouth did inform ORH that although no further 321 NXX codes were available, there were now 407 NPA blocks available. However, it advised BellSouth that a 407 NXX code would not be compatible with its MADP. ORH stated that its internal team spent much time, resources, and expense to notify all parties of its new 321 NXX numbers, and completed a total change of all of its phone numbers in a variety of telephone directories across multiple telephone companies. ORH believes that it would be a hardship to now switch its numbers back to 407 NXX blocks.

DATE: January 9, 2003

The purpose of freezing all unused 321 NXX blocks in the Orlando area for reassignment in the Brevard County area was to extend the life of the 321 area code. Based on the additional 321 NXX blocks allotted to Brevard County, NANPA revised its estimated exhaust date for the 321 NPA in Brevard County to the third quarter of 2021. With the onset of wireless number pooling, the exhaust date is likely to be extended again when the new forecast is issued in a few months.

Staff recognizes that ORH was caught in the middle of the area code relief process for the central Florida area, and agrees that it would be a hardship to change 20,000 numbers back to the 407 area code to receive an additional 10,000 numbers to complete its MADP. Since the exhaust date for the Brevard County 321 area code has been extended to 2021, it appears that the issuance of one 321 NXX code would not materially alter the exhaust date of the 321 area code in Brevard County.

Staff believes that ORH should be allowed to obtain a 321 NXX code based on the special circumstances in this case. Therefore, staff recommends that the Commission direct NANPA to issue a 321 NXX code to BellSouth for ORH's use in the Orlando area.

**ISSUE 2:** Should these dockets be closed?

**RECOMMENDATION:** If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, these dockets should be closed upon the issuance of a consummating order. (TAYLOR)

**STAFF ANALYSIS:** At the conclusion of the protest period, if no protest is filed, these dockets should be closed upon the issuance of a consummating order.