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: March 19, 2020

TO: Office of Commission Clerk (Teitzman)

FROM: Office of Industry Development and Market Analysis (Deas, Fogleman)
Office of the General Counsel (Weisenfeld, Passidomo)

RE: Docket No. 20190196-TP – Petition of North American Numbering Plan Administrator on behalf of the Florida telecommunications industry, for approval of consensus decision to recommend to the Commission an all-services overlay as the form of relief for the 813 numbering plan area.

AGENDA: 03/31/20 – Regular Agenda – Proposed Agency Action - Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Polmann

CRITICAL DATES: The estimated exhaust date for the 813 area code is the third quarter of 2022

SPECIAL INSTRUCTIONS: None

Case Background

On October 28, 2019, the North American Numbering Plan Administrator (NANPA), on behalf of Florida's telecommunications industry (Industry) filed a petition with the Florida Public Service Commission (Commission) for approval of its area code relief plan for the 813 Numbering Plan Area (NPA). The Industry reached a consensus decision to recommend an all-services distributed overlay as the form of relief for the 813 NPA. NANPA projects that the supply of central office codes in the 813 NPA will exhaust during the third quarter of 2022. Consequently, NANPA is also requesting that the Commission approve the recommended 13-month implementation schedule.

NANPA is the neutral third-party administrator of the North American Numbering Plan, which is the area code system shared by the United States, Canada, Bermuda, and 17 Caribbean countries. NANPA's responsibilities include assigning area codes and prefixes, and tracking numbering usage to ensure effective and efficient utilization. NANPA is also responsible for forecasting the exhaust of geographic area codes and area code relief planning. NANPA publishes its forecasted exhaust of all area codes on a semi-annual basis. This forecast is used to determine when to start the area code relief process. The area served by NANPA is divided into NPAs, which are each identified by a three-digit NPA code, commonly called an area code.

The 813 area code was introduced in 1953 when the 305 area code needed relief due to substantial growth in demand for telephone numbers. It was the second area code assigned in Florida. Originally, the 813 area code was assigned to 16 counties stretching from Pasco county to the inland portion of Monroe county. Prior to the implementation of number conservation methods in 2002, the area served by the 813 area code was split twice, which created the 941 and 727 area codes.[1] Currently, the 813 area code serves all of Hillsborough county, the City of Oldsmar in Pinellas county, and the central and southeastern portions of Pasco county.

In April 2019, NANPA forecasted a need for area code relief for the 813 area code. Subsequently, pursuant to the area code Relief Planning Guidelines, NANPA began the planning process by announcing the need for relief and distributing an initial planning document to the Industry.[2] NANPA then hosted an Industry meeting on September 16, 2019, to discuss possible relief alternatives for the 813 area code. During the meeting, the Industry reviewed five relief options and reached a consensus to recommend the all-services distributed overlay plan to the Commission as the preferred method of relief for the 813 area code. On October 28, 2019, NANPA filed a petition with the Commission on behalf of the Industry requesting approval of the consensus decision. The Commission has jurisdiction to address this issue pursuant to Section 364.16(7) and 120.80(13)(d), Florida Statutes, and 47 Code of Federal Regulations (C.F.R.) § 52.19.

[1] Originally, telephone numbers were assigned to carriers in number blocks of 10,000. However, in an effort to conserve numbering resources, the thousand-block number pooling system was implemented. The thousand-block number pooling system allocates telephone numbers to carriers in blocks of 1,000 instead of the historical 10,000. Under this system, an unused 1,000 number block can be reclaimed and returned to inventory if it is not activated within six months of being assigned, unless the carrier can provide the Commission with a valid reason for needing an extension.

[2] This document included descriptions, maps, general facts and assumptions, and the projected life of four area code relief alternatives. A geographic split in the 813 area code did not meet the NPA code relief planning guidelines; therefore, NANPA did not recommend a geographic split for consideration. The Industry also proposed one additional alternative.

Discussion of Issues

Issue 1: Should the Commission approve the Industry's consensus recommendation of an all-services distributed overlay as the area code relief plan for the 813 area code?

Recommendation: Yes, the Commission should approve the Industry's consensus recommendation of an all-services distributed overlay as the area code relief plan for the 813 area code. (Deas, Fogleman, Weisenfeld, Passidomo)

Staff Analysis: Area code relief responsibilities have been delegated to the states by the Federal Communication Commission (FCC) pursuant to 47 C.F.R. § 52.19. In Florida, the Commission is responsible for determining the appropriate form of area code relief when telephone numbers exhaust within an area code. There are a number of methods available to address area code exhaust issues; however, the two most commonly used methods are a geographic split or an overlay.

Geographic Split

The geographic split method divides the exhausting NPA into two, leaving the existing area code to serve one NPA and assigning a new area code to serve the other NPA. This method generally acknowledges jurisdictional or natural boundaries, but for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Under this method, customers on both sides of the split would retain seven digit dialing; however, it would require one half of the customers to change their area code. The last split implemented in Florida was 18 years ago. Industry guidelines specify that in the case of a geographic split, the difference in area code life expectancies between the split areas should be 10 years or less.[3] According to NANPA, a geographic split in the 813 area code would result in an exhaust life that exceeds this 10 year limit between the two areas. Therefore, no split alternative was included in NANPA' s petition.

Overlay

The overlay method adds a new area code to the same geographic area served by the area code requiring relief. This results in the assignment of more than one area code to the same NPA. Current customers keep their existing area code and number; however, new customers or customers adding additional lines would receive the new area code. Once an overlay is implemented, the FCC requires 10-digit dialing for all local calls within the NPA. There are four potential implementation strategies for an overlay, which are as follows:

> **a) All-Services 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. The new area code is added to the same geographic area as the code requiring relief and shares exactly the same geographic boundaries.

[3] NPA Code Relief Planning & Notification Guidelines ATIS-0300061 - Section 5.0 (g).

b) Concentrated Growth Overlay - A concentrated growth overlay may be considered in situations when the majority of need for the new telephone numbers is 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 area code 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 area code. As more relief is required, the geographic area served by multiple area codes could expand to the rest of the NPA.

c) Boundary Elimination Overlay - With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with available numbering resources. The boundary between these NPAs is eliminated, and spare telephone numbers from the adjacent area code are assigned within the NPA boundary where relief is required.

d) Multiple Overlay - The multiple overlay strategy may be considered where relief is required in an NPA served by two or more area codes. The new area code would be assigned to overlay the multiple existing area codes serving the entire geographic area. This essentially functions the same as an all-services distributed overlay.

During the September 16, 2019 Industry meeting hosted by NANPA, the following five relief plans were considered.

Alternative No. 1 - All-Services Distributed Overlay (see map in Attachment A)
A new area code would be assigned to the same geographic area occupied by the existing 813 area code. Customers would retain their current telephone numbers; however, 10-digit dialing would be required by all customers within the NPA. At the exhaust of the 813 area code, all future assignments will be made from the new area code. The projected life of this method would be approximately 37 years.

Alternative No. 2 - NPA Boundary Elimination Overlay (see map in Attachment B)
The boundary between the existing 813 and 727 area codes would be eliminated and both area codes would be assigned to the combined geographic area. This alternative would allow customers assigned the 813 and 727 area codes to retain their telephone numbers and would eliminate the need for a new area code. However, it would require 10-digit dialing for all customers within the combined NPA. The projected life of this method would be approximately 11 years.

Alternative No. 3 - NPA Boundary Elimination Overlay (see map in Attachment C)
The boundary between the existing 813 and 863 area codes would be eliminated and both area codes would be assigned to the combined geographic area. This alternative would allow customers assigned the 813 and 863 area codes to retain their telephone numbers and would eliminate the need for a new area code. However, it would require 10-digit dialing for all customers within the combined NPA. The projected life of this method would be approximately 17 years.

Alternative No. 4 - NPA Boundary Elimination Overlay (see map in Attachment D)
The boundary between the existing 813 and 941 area codes would be eliminated and both area codes would be assigned to the combined geographic area. This alternative would allow customers assigned the 813 and 941 area codes to retain their telephone numbers and would eliminate the need for a new area code. However, it would require 10-digit dialing for all customers within the combined NPA. The projected life of this method would be approximately 16 years.

Alternative No. 5 - Overlay of a New Area Code Over the Boundary Elimination (see map in Attachment E)
The boundary between the 813 and 727 area codes would be eliminated and a new area code would be assigned to the combined geographic area. This alternative would allow customers assigned the 813 and 727 area codes to retain their telephone numbers. However, it would require 10-digit dialing for all customers within the NPA. At the exhaust of the 813 and 727 area codes all future assignments would be made from the new area code. The projected life of this method would be approximately 41 years.

Industry Consensus
After review of the five alternatives the Industry reached a consensus recommending alternative No. 1, an all-services distributed overlay, as the recommended form of relief for the 813 NPA. The Industry decided against the boundary elimination overlay alternatives because they would impact a larger quantity of customers with 10-digit dialing than the all-services overlay. In addition, the Industry asserted that the boundary elimination alternatives would involve a more complex customer education process and lead to increased customer confusion.

Proposed Dialing Plan
If an all-services overlay is approved by the Commission, the Industry recommends the dialing plan be set forth as follows:

- Local Calls — 10-digit dialing (as required by the FCC)
- Toll Calls — 1 + 10-digit dialing
- Operator Calls — 0 + 10-digit dialing

Proposed Implementation Schedule
The Industry has also recommended a 13-month implementation schedule. This schedule includes six-months for network preparation, followed by a six-month permissive 10-digit dialing and customer education period. New codes are not activated until one month after the mandatory 10-digit dialing period. However, the Industry notes that the new area code would not be assigned until all assignable prefixes in the 813 area code have been assigned. During the permissive dialing period, calls within the 813 area code can be completed using either 7-digits or 10-digits. The purpose of the permissive dialing period is to facilitate transition from 7-digit to 10-digit dialing by educating customers on the impending changes without impacting the calls. Following the six month permissive dialing period, mandatory 10-digit dialing will be required. If the required 10-digits are not dialed, the caller will receive a recorded message advising them that the area code is required to complete the call. This schedule will allow the Industry sufficient time to implement the new area code prior to the exhaustion of 813.

Staff Workshops

In an effort to educate and receive customer input, staff held customer workshops on February 6, 2020, in Tampa, FL, and February 7, 2020, in St. Petersburg, FL. During these workshops Commission staff and a representative from NANPA explained the area code relief process, the relief options being considered, and the customer impact. Staff also allotted time for customers to ask questions or give comments. There were no customers nor customer comments at either workshop; however, since that time, the Commission has received one customer comment favoring alternative No. 1.

Conclusion

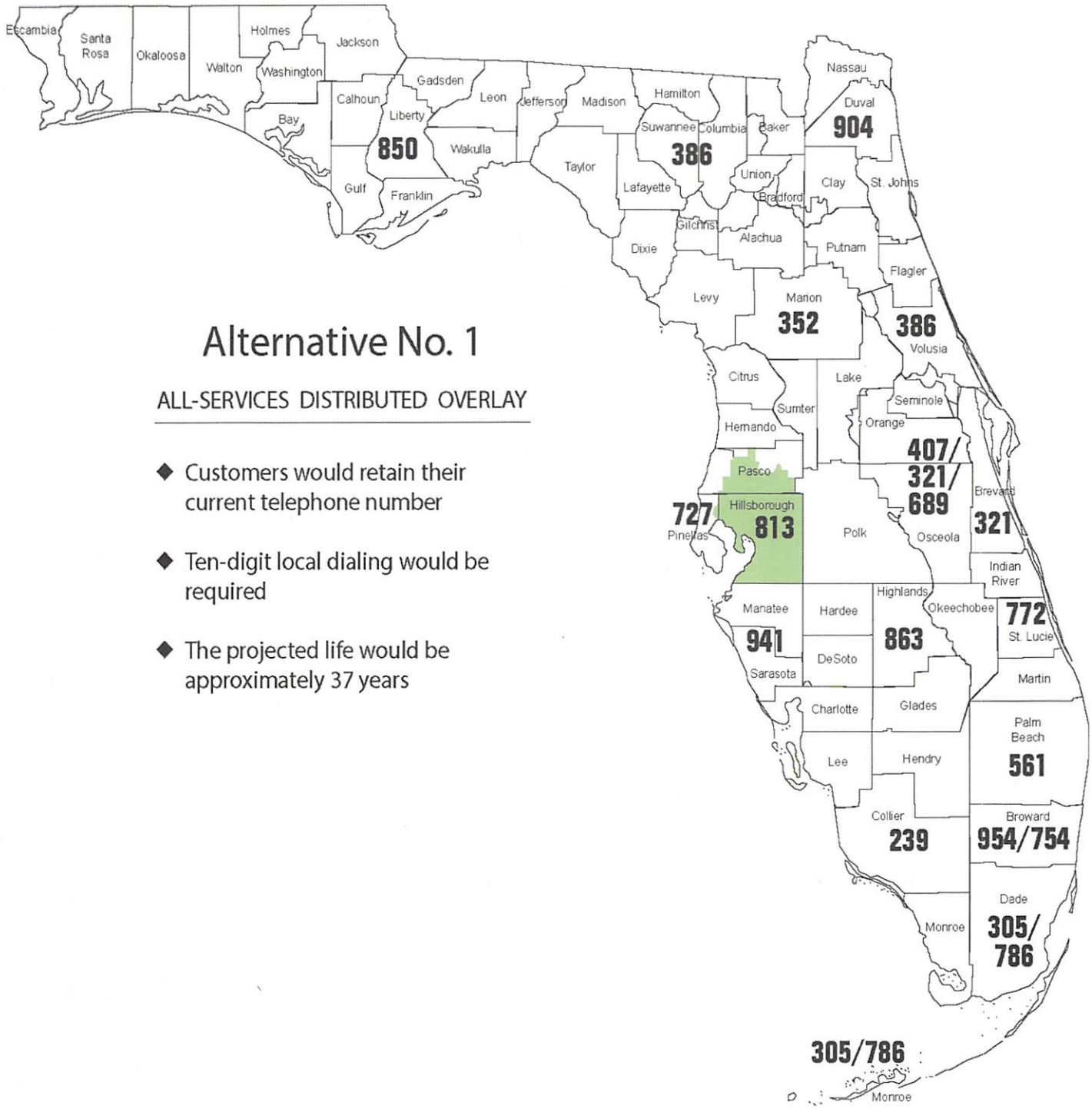
Staff reviewed the petition and analyzed all of the alternatives. Staff considered which alternative would provide the longest length of time before needing relief and the impact on customers. Alternative No. 5 provides the longest projected exhaust date; however, staff notes that all of the alternatives being considered share the same impact on customers. Customers would be required to dial 10-digits for all local calls. All things considered, alternative No. 5 provides the longest projected length of time, but would also negatively impact more customers by imposing 10-digit dialing for customers who otherwise would not be affected for another 28 years or more.

Staff agrees with the Industry that the more favorable approach is to minimize the number of customers that would be impacted by 10-digit dialing. Therefore, staff recommends the Commission approve the Industry's proposed all-services distributed overlay as the form of relief for the 813 area code. Additionally, staff recommends Commission approval of the proposed 13-month implementation schedule that includes a six-month customer permissive dialing period. Finally, staff recommends the Commission approve that central office codes in the new area code be available only when all assignable prefixes in the 813 area code have been assigned.

Issue 2: Should this docket 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 Proposed Agency Action Order, this docket should be administratively closed upon the issuance of a Consummating Order. (Weisenfeld, Passidomo)

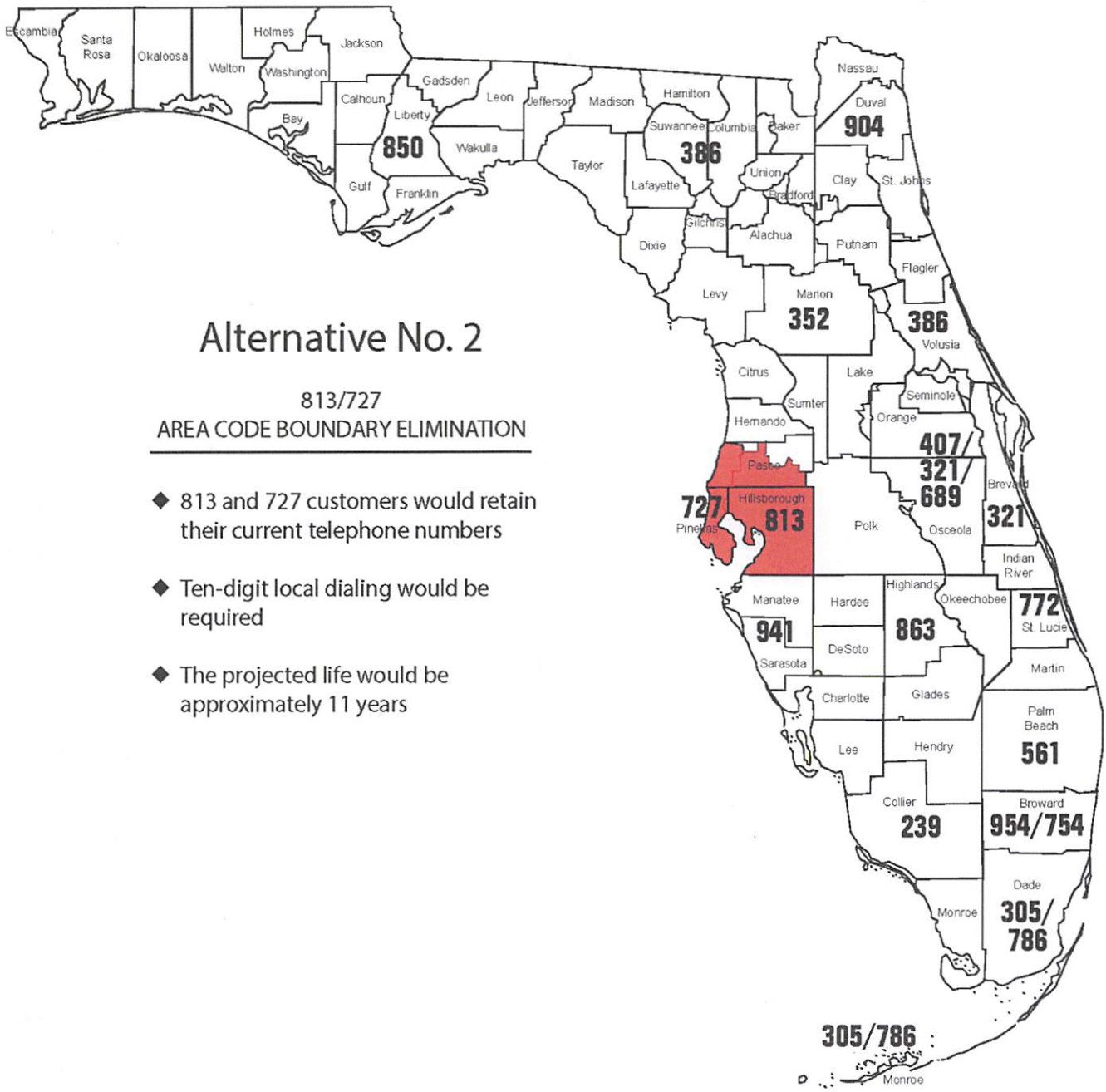
Staff Analysis: At the conclusion of the protest period, if no protest is filed, this docket should be administratively closed upon the issuance of a Consummating Order.



Alternative No. 1

ALL-SERVICES DISTRIBUTED OVERLAY

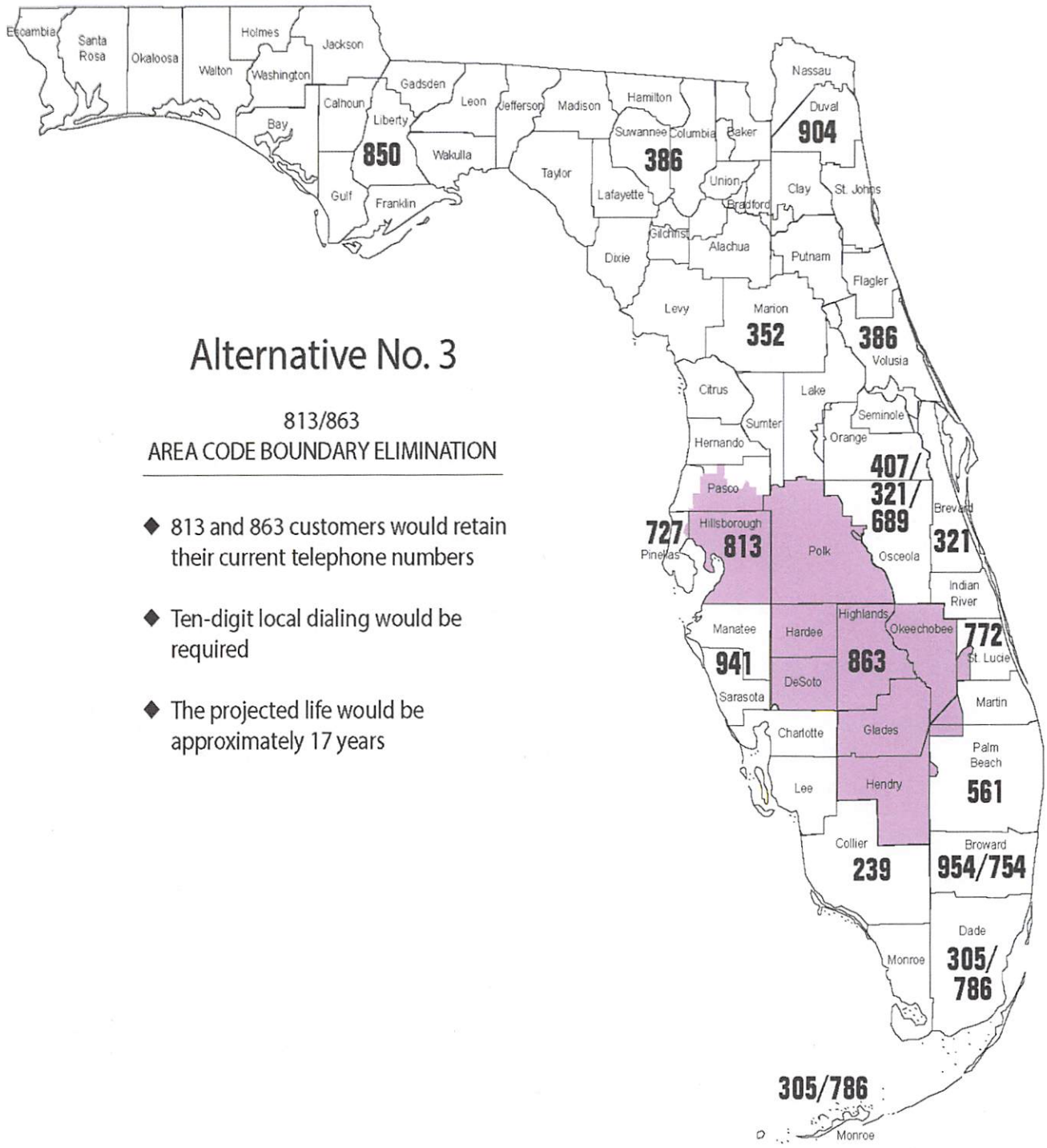
- Customers would retain their current telephone number
- Ten-digit local dialing would be required
- The projected life would be approximately 37 years



Alternative No. 2

813/727
AREA CODE BOUNDARY ELIMINATION

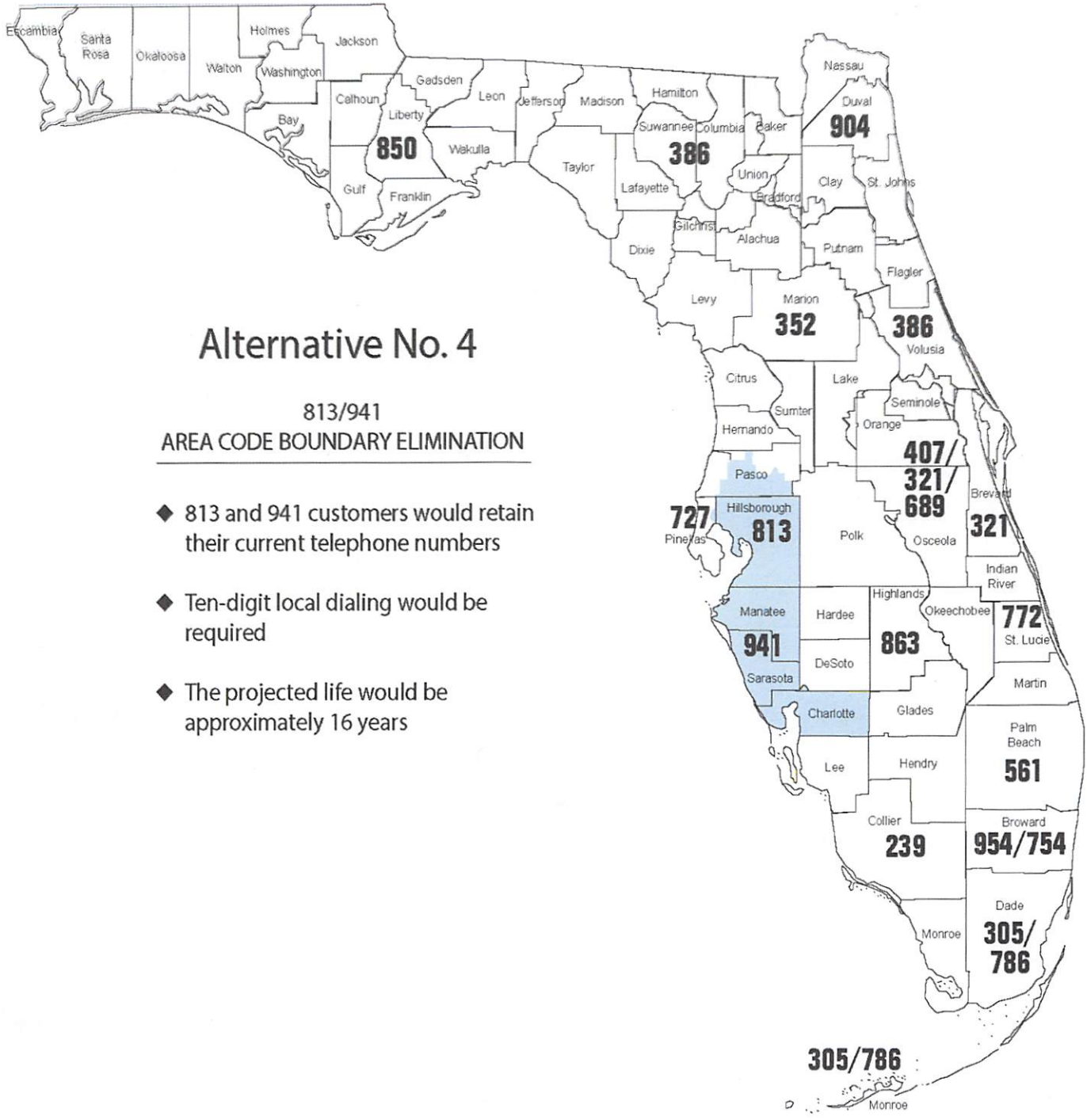
- 813 and 727 customers would retain their current telephone numbers
- Ten-digit local dialing would be required
- The projected life would be approximately 11 years



Alternative No. 3

813/863
AREA CODE BOUNDARY ELIMINATION

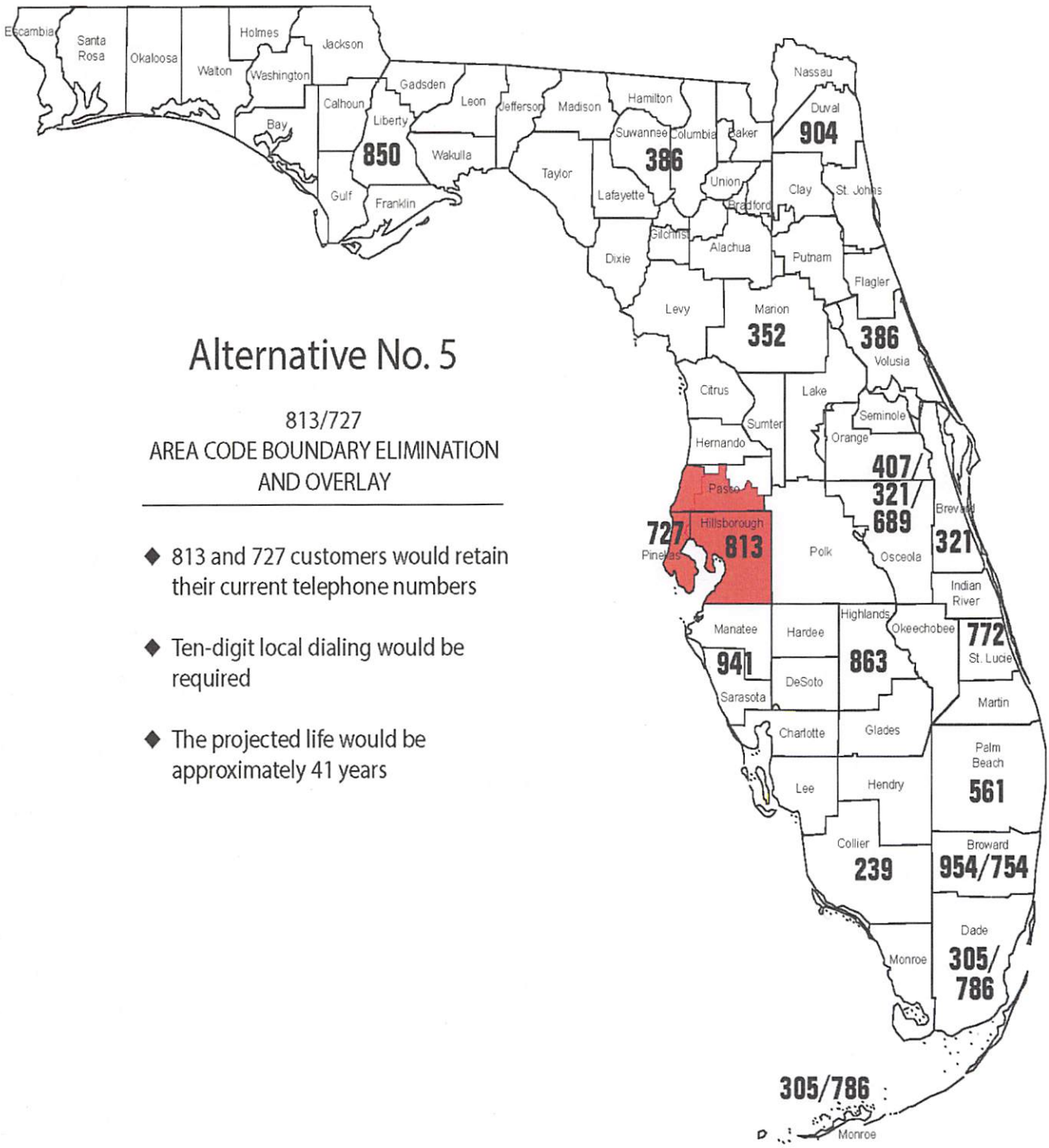
- 813 and 863 customers would retain their current telephone numbers
- Ten-digit local dialing would be required
- The projected life would be approximately 17 years



Alternative No. 4

813/941
AREA CODE BOUNDARY ELIMINATION

- 813 and 941 customers would retain their current telephone numbers
- Ten-digit local dialing would be required
- The projected life would be approximately 16 years



Alternative No. 5

813/727
AREA CODE BOUNDARY ELIMINATION
AND OVERLAY

- 813 and 727 customers would retain their current telephone numbers
- Ten-digit local dialing would be required
- The projected life would be approximately 41 years