

State of Florida



# Public Service Commission

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**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** January 20, 2022

**TO:** Office of Commission Clerk (Teitzman)

**FROM:** Office of Industry Development and Market Analysis (Deas, Fogleman) *CH*  
Office of the General Counsel (Imig) *TLJ*

**RE:** Docket No. 20210190-TP – Petition on behalf of the Florida telecommunications industry for expeditious approval of the industry's consensus recommendation to implement Alternative No. 1, the all-services distributed overlay of the 305/786 NPA overlay, by North American Numbering Plan Administrator.

**AGENDA:** 02/01/22 – Regular Agenda – Interested Persons May Participate

**COMMISSIONERS ASSIGNED:** All Commissioners

**PREHEARING OFFICER:** Graham

**CRITICAL DATES:** The estimated exhaust date for the 305/786 area codes is the first quarter of 2024

**SPECIAL INSTRUCTIONS:** None

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## Case Background

On December 2, 2021, 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 305/786 Numbering Plan Area (NPA). The Industry reached a consensus decision to recommend an all-services distributed overlay as the form of relief for the 305/786 NPA. NANPA projects that the supply of central office codes in the 305/786 NPA will exhaust during the first quarter of 2024. Consequently, NANPA is also requesting that the Commission approve the recommended 9-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. The area served by NANPA is divided into NPAs, which are each identified by a three-digit NPA code, commonly called an area code. 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 305 area code was created in 1947 and originally covered the entire state of Florida. The first geographic split of the 305 NPA occurred in 1953, resulting in the creation of the 813 NPA. Over the next 40 years, the 305 NPA was split twice more to create the 407 and 954 NPAs. In 1998, area code relief was needed again for the 305 area code. Rather than splitting the 305 NPA again, the Commission approved an overlay, resulting in the 786 area code being assigned to the same NPA. The 786 area code overlay originally covered only Miami-Dade County but was expanded to include the Keys in 2014. Currently, the 305/786 area code serves Miami-Dade County and the Florida Keys, which includes municipalities such as Miami, Coral Gables, and Homestead.

In October 2021, NANPA forecasted that the 305/786 area code would exhaust during the first quarter of 2024. NANPA convened an industry meeting on November 8, 2021, to review and approve the area code relief filing. On December 2, 2021, NANPA filed a petition with the Commission on behalf of the Industry requesting approval of an all services distributed overlay for the 305/786 area code (see map Attachment A). The Commission has jurisdiction to address this issue pursuant to Sections 364.16(7) and 120.80(13)(d), Florida Statutes, and 47 Code of Federal Regulations (C.F.R.) § 52.19.

## 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 305/786 area codes?

**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 305/786 area codes. (Deas, Fogleman, Imig)

**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 19 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.<sup>1</sup>

### 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.

**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

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<sup>1</sup> NPA Code Relief Planning & Notification Guidelines ATIS-0300061 - Section 5.0 (g).

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.

NANPA asserts that based on industry guidelines, when area code relief is required for an existing overlay area, only an overlay will meet the requirement for relief. Therefore, during the November 8, 2021 Industry meeting hosted by NANPA the following three overlay relief alternatives 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 305/786 area codes. Customers would retain their current telephone numbers and would continue to dial 10-digits when making local calls. At the exhaust of the 305/786 area codes, all future assignments will be made from the new area code. The projected life of this method would be approximately 19 years.

**Alternative No. 2 – Boundary Elimination Overlay (see map in Attachment B)**

The boundary between the existing 305/786 and 754/954 area codes would be eliminated and all four area codes would be assigned to the same geographic area. This alternative would allow customers assigned to the 305/786 and 754/954 area codes to retain their telephone numbers and would eliminate the need for a new area code. Also, customers would continue to dial 10-digits when making local calls. The projected life of this method would be approximately 10 years.

**Alternative No. 3 – Boundary Elimination Overlay With All-Services Distributed Overlay (see map in Attachment C)**

The boundary between the existing 305/786 and 754/954 area codes would be eliminated and a new area code would be assigned to the combined geographic area. This alternative would allow customers assigned to the 305/786 and 754/954 area codes to retain their telephone numbers and continue to dial 10-digits when making local calls. At the exhaust of the 305/786 and 754/954 area codes, all future assignments would be made from the new area code. The projected life of this method would be approximately 22 years.

**Industry Consensus**

After review of the three overlay alternatives, the Industry reached a consensus recommending alternative No. 1, an all-services distributed overlay, as the recommended form of relief for the 305/786 area codes. Industry chose this alternative because in September of 2021, NANPA

declared “jeopardy” in the 305/786 area codes.<sup>2</sup> Jeopardy is declared when the forecasted and/or actual demand for numbering resources is expected to exceed the supply of numbers before area code relief can be implemented. According to Industry, the two boundary elimination alternatives would require additional technical work and modifications to switches in all of the four overlay area codes. As a result, Industry states it chose the all-services distributed overlay because it will take less time to implement than the boundary elimination alternatives.

The Industry has also recommended a 9-month implementation schedule. Since mandatory 10-digit dialing is already in place there will be no permissive dialing period. Therefore, the new area code will be implemented at the completion of the necessary network preparation and customer education. Industry asserts this schedule will allow sufficient time to implement the new area code prior to exhaust of the 305/786 area codes.

### **Proposed Dialing Plan**

The following recommended dialing plan is already in place in the 305/786 NPA:

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

### **Staff Workshop**

In an effort to educate and receive customer input, staff held a virtual customer workshop on December 21, 2021. During this workshop, Commission staff and a representative from NANPA explained the area code relief process, the relief option being considered, and customer impact. Two customer comments were filed with the Commission and both were in favor of the all-services distributed overlay. One of the comments suggested what the new area code should be; however, according to numbering guidelines, that decision is determined by NANPA.

### **Conclusion**

Staff reviewed the petition and analyzed all of the alternatives. Staff considered the impact each alternative would have on customers as well as the Industry. In all of the alternatives being considered, customers will retain their current telephone numbers and continue dialing 10-digits. Staff notes that due to an increase in requests for numbering resources by Industry, NANPA declared jeopardy for the 305/786 area codes. Jeopardy was declared in order to ensure that the available supply of numbers does not exhaust before area code relief can be implemented. Under the current jeopardy conditions, Industry is limited in how many numbering resources they can access per month. With this in mind, staff agrees with Industry that the all-services distributed overlay will take less time to implement than the boundary elimination alternatives. The shorter

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<sup>2</sup> With FCC approval, NANPA declares jeopardy in order to ration the number of Central Office codes that can be assigned each month when the supply of numbers could exhaust before area code relief can be implemented.

implementation period will minimize the numbering resource restriction period for Industry as they try to accommodate customer demand.

Staff agrees with the Industry and recommends the Commission approve the proposed all-services distributed overlay as the form of relief for the 305/786 area codes. Additionally, staff recommends Commission approval of the proposed 9-month implementation schedule. Finally, staff recommends the Commission order that central office codes in the new area code be available only when all assignable prefixes in the 305/786 area codes 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 closed upon the issuance of a Consummating Order. (Imig)

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







