

I. Meeting Packet



State of Florida
Public Service Commission
REVISED INTERNAL AFFAIRS AGENDA

Tuesday – March 29, 2022

11:00 AM

Room 148 – Betty Easley Conference Center

1. Overview of the North American Numbering Plan Administrator and Area Code Relief – by Linda Hymans, Sr. Manager, Contract Performance and Heidi Wayman, Manager, Data Management (Attachment 1)
2. Legislative Update
3. General Counsel's Report
4. Executive Director's Report
5. Other Matters

BB/aml

OUTSIDE PERSONS WISHING TO ADDRESS THE COMMISSION ON
ANY OF THE AGENDAED ITEMS SHOULD CONTACT THE
OFFICE OF THE EXECUTIVE DIRECTOR AT (850) 413-6463.



Florida Numbering Overview

March 22, 2022

Heidi Wayman

Linda Hymans

North American Numbering Plan Administrator (NANPA) Neutrality

The North American Numbering Plan Administrator (NANPA) functions are performed under a Federal Communications Commission (FCC) contract.

NANPA is a neutral administrator.

FCC regulations require the NANPA to be a non-governmental entity that is impartial and not aligned with any particular telecommunications industry segment.

- NANPA may not be an affiliate of any telecommunications service provider(s). “Affiliate” is a person who controls, is controlled by, or is under the direct or indirect common control with another person.

NANPA and any affiliate may not issue a majority of its debt to, nor may it derive a majority of its revenues from, any telecommunications service provider.

- “Majority” shall mean greater than 50 percent, and “debt” shall mean stocks, bonds, securities, notes, loans, or any other instrument of indebtedness

NANPA may not to be subject to undue influence by parties with a vested interest in the outcome of numbering administration and activities.



NANPA Contract

On October 5, 2018, the FCC awarded contract number 273FCC19C0002, a one-year bridge contract for NANPA and PA/p-ANI administration services, to Somos, Inc.

- The NANP Administration System (NAS), Pooling Administration System (PAS), Routing Number Administration System (RNAS) were transitioned with existing personnel seamlessly to Somos, maintaining continuity of service. This contract expired on October 31, 2019.
- On November 1, 2019, the FCC extended the bridge contract for 6-months with two additional 3-month options. The FCC exercised a total of three extensions and the bridge contract expired on November 30, 2020.
- On December 1, 2020, the FCC awarded the permanent contract for the NANPA to SomosGov, Inc. and includes combining the current NANPA, Pooling and Routing Number Administration (RNA or p-ANI) services into one NANPA organization, as well as the Reassigned Numbers Database Administrator (RNDA) functions. This contract is for a base period of five-years, with three additional one-year options.

NANPA Responsibilities

CO Code and Thousands-Block Assignment:

- Receive and process applications for CO Code and Thousands-Block assignments
- Reclaim CO codes and blocks that are not placed into service
- Update information associated with assigned CO Codes and blocks and keep the industry informed as the supply of available CO Codes approaches exhaust

Numbering Plan Area (NPA) relief planning:

- Initiate NPA (also known as area code) relief planning and develop an industry consensus plan for introducing a new area code:
 - Relief planning begins 36 months prior to forecasted exhaust
 - Relief plan filed on behalf of the industry with appropriate state regulatory authorities for their review and approval
 - Upon approval, NANPA initiates first meeting of the industry to begin implementation of approved relief plan
- NANPA works with state regulators on an ongoing basis and monitors CO code assignments and its impact on area code exhaust

Numbering Resource Utilization/Forecast (NRUF) Report Processing:

- Semi-annual reporting of utilization and forecast data by all service providers
 - Reporting cycles: February 1 (July 1 - Dec. 31) and August 1 (Jan. 1 - June 30)
- Process NRUF submissions and respond with confirmation/error notifications (sent within 7 calendar days of submission)
 - Initiated upon submission of a Form 502 with an email notification identifying the errors
- Missing Utilization Notifications (sent within 45 days of submission deadline)
 - Notification to service provider that submitted NRUF but failed to report utilization on assigned codes and/or thousands-blocks

Other Resource Administration:

- 5XX-NXX, 900-NXX, N11, Carrier Identification Codes (CICs), ANI II (Automatic Number Identification Information Integers digits), Vertical Service codes

Routing Number/p-ANI Administration:

- Receive and process applications for 211 or 511 non-dialable numbers to provide enhanced 911 location services

Rules of the Road

NANPA administers NANP resources in accordance with:

► **FCC rules:**

- 47 CFR 52.15 (CO Code)
- 47 CFR 52.19 (NPA Relief)
- 47 CFR 52.20 (Thousands Block Number Pooling)
- 47 CFR 52.23 (Local Number Portability (LNP))

► **FCC contract**

► **ATIS Industry Numbering Committee (INC) Guidelines:**

- The purpose of assignment guidelines is to provide a detailed framework for the administration of resources and specify the responsibilities of all parties involved
- Guidelines are developed by industry subject-matter experts from carriers and number administrators
- The ATIS consensus process is used to update/modify/enhance the guidelines
 - TBCOCAG (Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines)
 - Location Routing Number Assignment Practices
 - NPA Relief Planning and Notification Guidelines
 - These documents are available for free and can be downloaded from the Industry Numbering Committee (INC) link, https://access.atis.org/apps/group_public/documents.php?view



North American Numbering Plan (NANP) Overview

1947 – First Area Codes assigned by Bellcore

- 86 Area Codes Assigned at inception

1947 – 1995 - Slow and Steady Growth in Area Code Assignments

1996 – Start of Competitive Surge

- 163 area codes assigned by end of 1996
- Telecommunications Act of 1996
- Dawn of Competitive local Exchange Carriers (CLECs)
- Local Number Portability for Wireline Only

1997- 2001 – Area Code Assignment Growth Period

- NANP Exhaust Predicted between 2010 and 2020
- 311 area codes assigned by the end of 2001
- Wireless Local Number Portability added
- First overlay area codes introduced

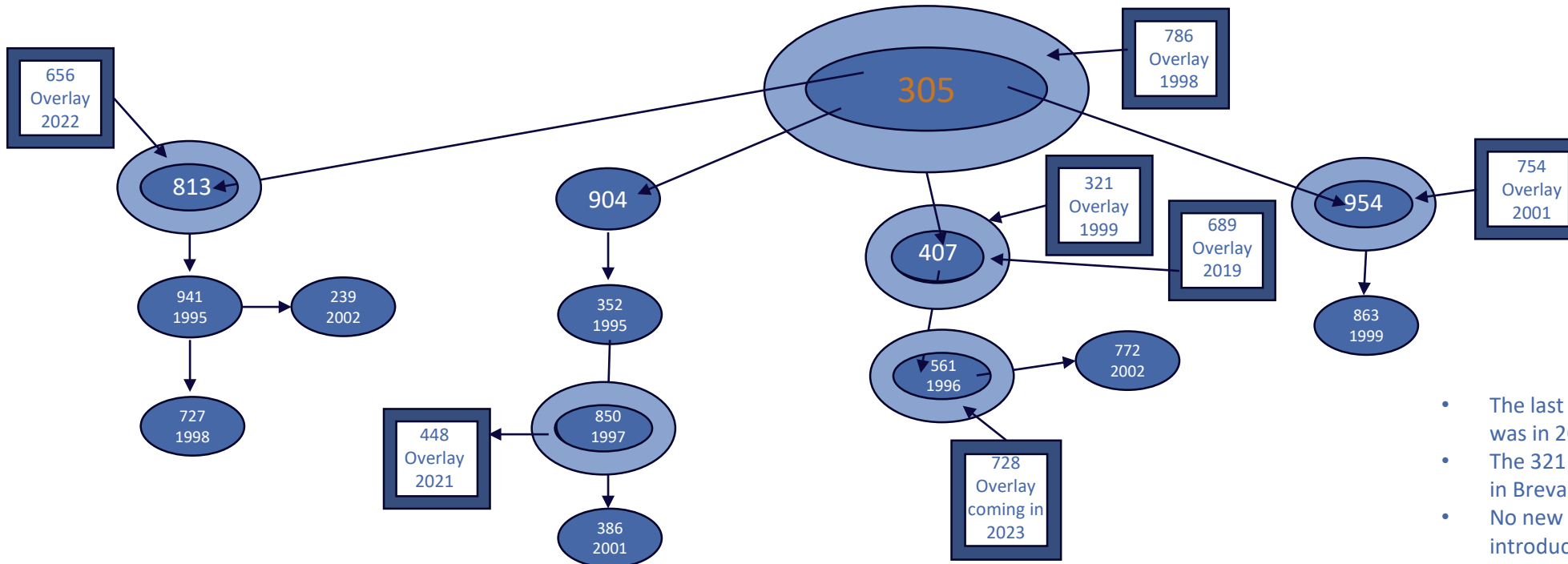
2002- Present – Thousands-Block Pooling Period

- As of the October 2021 NANP Exhaust Analysis the NANP is projected to exhaust in 2063.
- As of December 31, 2021, there were 450 area codes assigned; 426 are in service and 25 are awaiting implementation. Of the 426 NPA codes in service, 401 are geographic and 25 are non-geographic.
- Interconnected VoIP gain direct access to numbers:
 - SBC-IS granted a temporary waiver of numbering access rules in 2005
 - 6-month Interconnected VoIP trial in 2013
 - Authorization for interconnected VoIP to obtain direct access to numbering resources began in 2016

Florida Area Code History

As part of the creation of the North American Numbering Plan (NANP), Florida was assigned the 305 area code in 1947. Within six years, the 813 area code was created from the 305 area code in 1953.

The 305 was split three more times: in 1965 to create the 904, in 1988 to create the 407, and in 1995 to create the 954.



- The last geographic split in Florida was in 2002.
- The 321 NPA was reserved for use in Brevard County only in 2002.
- No new area codes were introduced in Florida between 2002 and 2019.

Florida Area Code Map



Introduction of Thousands-Block Number Pooling

In March 2000, the FCC acknowledged the distribution of numbers in blocks of 10,000 as one of the major drivers of the potential exhaust of the NANP.

- Thousands-Block number pooling permits a single NPA-NXX to be shared among multiple service providers within the same rate center using the existing number portability infrastructure
- Pooling uses the Location Routing Number (LRN) platform portion of Local Number Portability
- The national rollout of Thousands-Block Number Pooling began in 2002

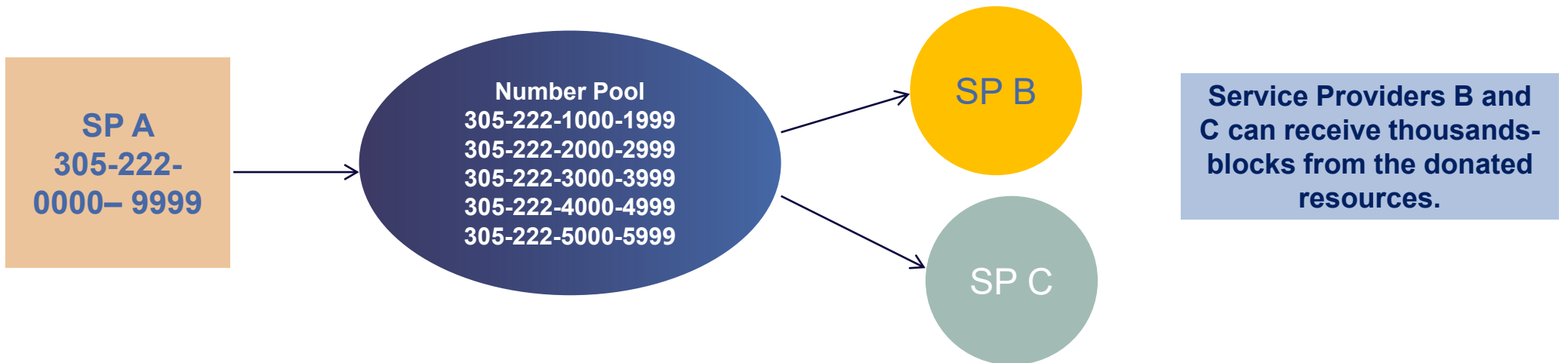
Participation in thousands-block number pooling is required by all service providers operating in the **Top 100 Metropolitan Statistical Areas (MSAs)**, unless exempted by the FCC and in all areas designated as mandatory by a state regulatory mandate as a result of delegated authority, unless exempted by the FCC.

NANPA updates the Top 100 list when new census population figures are released, and the Office of Management and Budgets (OMB) publishes a bulletin.

- MSAs designated at any time to be in the Top 100 remain mandatory even if they drop out due to population changes. There are 63 MSAs no longer in the Top 100 MSA where there is mandatory pooling.
- Exemption from pooling is by carrier not by rate center and should not be confused with an “excluded” rate center
- Service providers may opt into pooling in an EXCLUDED (X) rate center at anytime by simply contacting NANPA to change the status to OPTIONAL (O).
- Once a carrier elects to voluntarily pool it may not change its mind and go back to not pooling in that rate center
- Currently, there is pooling in every state, District of Columbia and Puerto Rico

Thousands-Block Pooling – How it works

- Service Provider (SP) 'A' is the code holder for the 305-222 CO code.
- Service Provider 'A' keeps the 0000 block and returns the 1000 – 9000 blocks to the pool.



Benefits of Thousands-Block Pooling

- Blocks within the same CO/NXX code can be shared by different service providers within the same rate center, providing more efficient number utilization
 - Reduces the resource depletion required for a carrier to service a rate center from 10,000 to 1,000 numbers
 - Ability to utilize slightly used (10% contaminated, <100 numbers) and unused blocks
 - Not customer-affecting
 - Used solely or in conjunction with other measures, it can extend the life of an area code
- 👉 In Florida, thousands-block pooling postponed area code relief for 17 years.

Florida Thousands-Block Pooling

Florida petitioned for and was granted delegated authority by the FCC to implement thousands-block pooling prior to the national rollout. The national rollout began in 2002, but the Florida PSC implemented pooling between 2000 and 2001.

There are 9 Top 100 Metropolitan Statistical Areas (MSAs) in Florida:

- Miami-Fort Lauderdale-Pompano Beach, FL MSA is ranked 7 (305/786, 561, 754/954,863)
- Tampa-St. Petersburg-Clearwater, FL MSA is ranked 18 (353, 656/813, 727)
- Orlando-Kissimmee-Sanford, FL MSA is ranked 23 (321 Brevard County, 321/407/689, 352, 863)
- Jacksonville, FL MSA is ranked 41 (352 (2 rate centers), 386, 904)
- North Port-Sarasota-Bradenton, FL MSA is ranked 73 (941)
- Cape Coral-Fort Myers, FL MSA is ranked 78 (239, 941)
- Lakeland-Winter Haven, FL MSA is ranked 84 (863)
- Deltona-Daytona Beach-Ormond, FL MSA is ranked 91(321 (1 rate center), 442/386)
- Palm Bay-Melbourne-Titusville, FL MSA is ranked 98 (321, 772 (1 rate center))

Every NPA in Florida has at least one rate center in an MSA except for 448/850. The 772 NPA has just one rate center in the Palm Bay-Melbourne-Titusville MSA.

Rate Center Status Details

239 NPA: There are 11 rate centers; 7 are FCC-Mandatory (M) and 4 are State Mandatory (**M**). **LATA 952**

305/786 NPA: There are 4 rate centers; all are FCC-Mandatory (M). **LATA 460**

321 NPA (Brevard County): There are 5 rate centers; all are FCC-Mandatory (M). **LATA 458**

321/407/689 NPA: There are 17 rate centers; all are FCC-Mandatory (M). **LATA 458**

352 NPA: There are 48 rate centers; 17 are FCC-Mandatory (M) and 31 are Optional (O). **LATA 454**

386 NPA: There are 33 rate centers; 15 are FCC-Mandatory (M) and 18 are Optional (O). **LATAs 452 and 456**

448/850 NPA: No MSAs. There are 64 rate centers; 63 are Optional (O) and 1 is Excluded (X). **LATAs 448, 450, and 953**

561 NPA: There are 17 rate centers; all are FCC-Mandatory (M). **LATA 460**

656/813 NPA: There are 8 rate centers; all are FCC-Mandatory. **LATA 952**

727 NPA: There are 5 rate centers; all are FCC-Mandatory. **LATA 952**

754/954 NPA: There are 5 rate centers; all are FCC-Mandatory. **LATA 460**

772 NPA: There are 8 rate centers; 1 is FCC-Mandatory (M), 6 are State Mandatory (**M**) and 1 is Optional (O). **LATA 460**

863 NPA: There are 22 rate centers; 12 are FCC-Mandatory (M) and 10 are Optional (O). **LATAs 939 and 952**

904 NPA: There are 19 rate centers; 17 are FCC-Mandatory (M), 1 is State Mandatory (**M**) 1 is Optional (O). **LATA 952**

941 NPA: There are 11 rate centers; 8 are FCC-Mandatory (M) and 3 are State Mandatory (**M**). **LATAs 939 and 952**

Local Access Transport Areas (LATAs):

A LATA generally represents an area within which a Regional Bell Operating Company (RBOC) is permitted to offer exchange telecommunications and exchange access services. The RBOCs are generally prohibited from providing services that originate in one LATA and terminate in another. LATAs become important when providers need to open a CO code for a Location Routing Number (LRN) in order to port and pool.



Are there any other number conservation measures?

There is only one other currently sanctioned number conservation measure: rate center consolidation.

Rate center consolidation removes the boundaries between rate centers to create one rate center. The advantage of rate center consolidation is that instead having to get multiple blocks or codes in that area, service providers would now need only one. This method of conservation only works in areas where there is demand in the rate centers being combined and only affects the exhaust of the NPA if it reduces the number of codes being opened.

Only rate centers within the same state and LATA may be combined. Rate centers can be combined across NPAs.

Other things to consider when consolidating rate centers:

- Changes in local calling scopes
- E911 issues where multiple PSAPs are involved
- Network provisioning and trunking rearrangements

Opening CO Codes/NXXs

CO codes in pooling rate centers are opened for **Location Routing Numbers (LRNs)**, **pool replenishment** and **dedicated customer** requests.*

A service provider rarely keeps a full CO code but requests a certain number of blocks from the code and the remaining blocks are returned to the pool.

- For an LRN, the requesting SP must be the code holder (is responsible for routing the code)
 - **There can be only one LRN per CO code**
 - A SP is allowed **one LRN per Local Access Transport Area (LATA) and switch or Point of Interconnection (POI)**
 - A way to prevent the opening of a new CO code for an LRN, is to transfer a CO code not currently being used an LRN, when possible
- Pool replenishment is used when there are not enough available blocks in the pool to meet forecasted demand
 - The objective is to maintain sufficient blocks of 1,000 numbers to ensure that all participating service providers' number requirements can be met
 - NANPA must rely on the service providers that can meet both the MTE (Months-to-Exhaust) and utilization (75%) requirements to open a code to add blocks from that code to the pool

NANPA manages the pool replenishment process by determining when a pooling rate center inventory will fall below the aggregated 6-month SP forecasts which establishes that it is necessary for service providers to replenish the pool

- CO codes can be opened for pool replenishment even when there is a sufficient number of blocks available to meet the SP's request if there are not enough blocks in the pool to meet the 6-month forecasted demand
 - Once a CO code is opened, even though blocks are returned to the pool, that NXX is removed from the inventory of available codes and contributes to projected exhaust of the area code
- The quantity of thousands blocks that need to be maintained in the inventory pool is determined by:
 - The anticipated assignment rate of thousands blocks from the inventory pool
 - No more than a six-month inventory level
- Dedicated customer requests must be for a full code, have a customer letter, and cannot be used for any other customers

*There are some companies that are exempt from pooling, such as paging carriers, and can open a full code directly through NANPA.

Typical Application Process and Workflow

When a **Service Provider (SP)** needs numbering resources in a Rate Center they must:

- Establish an **OCN**
- Get set up in Number Portability Administration Center (**NPAC**)
- Register in the NANP Administration System (**NAS**)
- Register in the Pooling Administration System (**PAS**)

There are two types of requests for new resources:

- **Initial CO codes/blocks**
 - The first-time requesting numbers in a rate center
 - Supporting documentation is required for all Initial requests (such as facilities readiness documentation, appropriate authorization, state waiver etc.).
- **Growth CO codes/blocks**
 - Already have resources in the rate center and need more
 - Must meet **Months to Exhaust (MTE)** and utilization threshold to obtain growth codes/blocks
 - ✓ Must demonstrate that existing codes for the rate center will exhaust within 6 months (**MTE**)
 - ✓ Must reach **75% utilization** in the rate center. The utilization level is calculated by dividing assigned numbers by the total numbering resources in the applicant's inventory and multiplying the result by 100. Newly assigned numbers may be excluded.

Regulators may view application forms in NAS and may view both forms and supporting documentation in PAS. Both require a secure login.

Currently CO code requests are processed through NAS, while blocks are processed through PAS. P-ANI requests are processed through the RNAS.

NPA Relief Planning Responsibilities

Area code (NPA) relief planning includes:

- Monitoring CO code assignments and its effect on area code exhaust
- Working with the industry and state regulators on an ongoing basis to ensure enough numbers are available to meet forecasted demand
- Beginning area code relief 36 months, when possible, prior to forecasted exhaust while following the INC “NPA Code Relief Planning and Notification Guidelines”
- Developing an industry consensus plan for introducing a new area code
- Filing the relief plan with appropriate state regulatory authorities for review and approval
- Initiating the first meeting of the industry to begin implementation of approved relief plan upon regulatory approval

NPA Exhaust Forecasting

- Using the CO code demand as a basis and factoring in the thousands-block and NRUF forecasts, NANPA develops an average, monthly CO code demand rate for each area code.
- In addition, NANPA also creates a pool of CO codes (referred to as a growth pool) to offset any potential large request for codes by a single service provider. Doing so may lessen the fluctuations in the exhaust projection that may be caused by a singular event.
- NANPA publishes new area code exhaust projections in April and October of each year.
- If it is necessary to revise an area code exhaust forecast prior to next publication date, NANPA will publish a “Delta” NRUF containing the updated NPA exhaust projection and posts this information to the NANPA website.
 - NANPA published Delta NRUF exhaust projections for the 904, 386 and 352 NPAs on January 4, 2022.
 - The 352 NPA exhaust date changed from third quarter 2026 to first quarter 2026
 - The 386 NPA exhaust date changed from second quarter 2041 to fourth quarter 2039
 - The 904 NPA exhaust date changed from fourth quarter 2024 to third quarter 2024

Inputs to NPA exhaust analysis

NANPA uses the following inputs to determine exhaust dates:

- Historical CO code monthly assignment data
- Service provider forecasts
- Number of unavailable CO codes
- Number of rate centers in the NPA
- Number of carriers in the NPA
- Total number of codes available for assignment
- Other miscellaneous data (e.g., spikes in requests, NANPA knowledge)

 Simply put, NPA relief is needed when the projected demand exceeds the number of available CO codes.

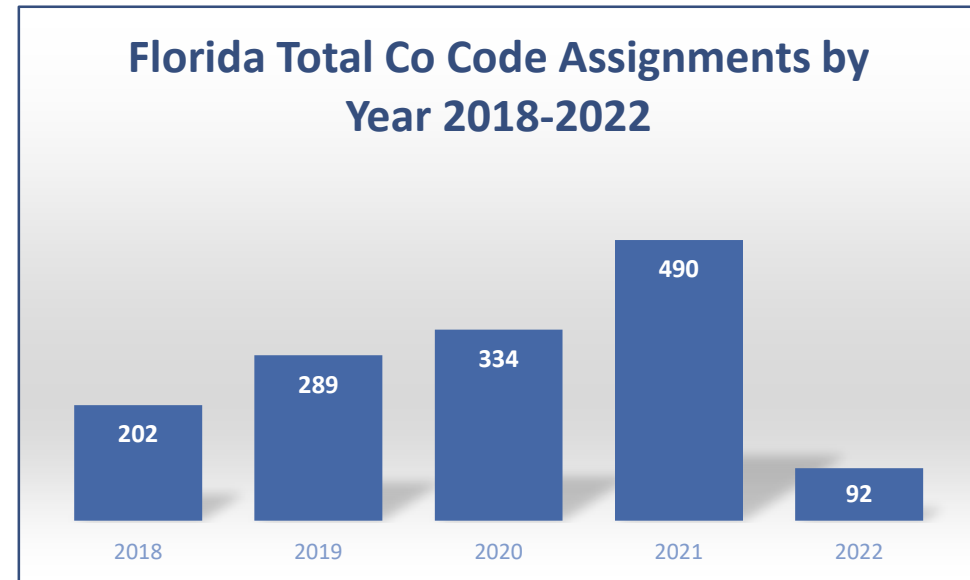
Why does Florida have so many NPA relief projects?

CO code assignments are up:

- New technologies using telephone numbers
- Carriers expanding service areas
- New carriers entering the market such as interconnected VoIP providers

Code Assignment Activity

| NPA | 2018 | 2019 | 2020 | 2021 | 2022 (Jan and Feb) |
|---------------|------------|------------|------------|------------|--------------------|
| 239 | 9 | 17 | 22 | 26 | 13 |
| 305 | 1 | 0 | 3 | 9 | 5 |
| 321 | 4 | 6 | 13 | 24 | 6 |
| 352 | 13 | 19 | 30 | 42 | 4 |
| 386 | 5 | 14 | 22 | 31 | 2 |
| 407 | 23 | 15 | 2 | 1 | 0 |
| 448 | N/A | N/A | 0 | 21 | 1 |
| 561 | 19 | 27 | 32 | 40 | 6 |
| 656 | N/A | N/A | N/A | 9 | 4 |
| 689 | N/A | 29 | 23 | 53 | 11 |
| 727 | 10 | 10 | 18 | 22 | 5 |
| 754 | 3 | 17 | 10 | 30 | 6 |
| 772 | 4 | 9 | 16 | 15 | 3 |
| 786 | 26 | 47 | 31 | 42 | 3 |
| 813 | 19 | 18 | 28 | 30 | 0 |
| 850 | 36 | 20 | 20 | 16 | 0 |
| 863 | 8 | 8 | 7 | 24 | 10 |
| 904 | 7 | 14 | 32 | 28 | 7 |
| 941 | 10 | 11 | 13 | 19 | 5 |
| 954 | 5 | 8 | 12 | 8 | 1 |
| TOTALS | 202 | 289 | 334 | 490 | 92 |



The full Code Assignment Activity (CAA) Report is a public monthly report available on the NANPA website.

October 2021 Exhaust Projections and History

| NPA | 2021.2 FCST | | 2021.1 FCST | | Change | 2020.2 FCST | | 2020.1 FCST | | 2019.2 FCST | | 2019.1 FCST | | Notes Comments |
|-------------|-------------|---------|-------------|---------|---------------------|-------------|---------|-------------|---------|-------------|---------|-------------|---------|-------------------|
| | Year | Quarter | Year | Quarter | 2021.1 to 2021.2 | Year | Quarter | Year | Quarter | Year | Quarter | Year | Quarter | |
| 239 | 2040 | 2Q | 2040 | 4Q | -2Q | 2048 | 4Q | | | | | | | b,h |
| 352 | 2026 | 3Q | 2028 | 3Q | -8Q | 2033 | 3Q | 2033 | 3Q | 2037 | 1Q | 2039 | 3Q | b |
| 386 | 2041 | 2Q | 2045 | 3Q | -17Q | | | | | | | | | b,h |
| 561 | 2023 | 3Q | 2024 | 3Q | -4Q | 2025 | 2Q | 2026 | 2Q | 2025 | 2Q | 2027 | 2Q | b |
| 727 | 2035 | 3Q | 2036 | 2Q | -3Q | 2042 | 4Q | 2044 | 2Q | 2048 | 4Q | 2044 | 3Q | b |
| 772 | 2060 | 1Q | 2069 | 1Q | -36Q | | | | | | | | | b,h |
| 813 | 2022 | 1Q | 2022 | 1Q | N/C | 2022 | 4Q | 2023 | 1Q | 2022 | 3Q | 2022 | 3Q | |
| 863 | 2050 | 3Q | 2064 | 2Q | -55Q | | | | | | | | | b,h |
| 904 | 2024 | 4Q | 2025 | 1Q | -1Q | 2025 | 4Q | 2029 | 2Q | 2031 | 2Q | 2032 | 1Q | b |
| 941 | 2048 | 1Q | 2054 | 3Q | -26Q | | | | | | | | | b,h |
| 305/786 | 2024 | 1Q | 2024 | 4Q | -3Q | 2024 | 3Q | 2023 | 3Q | 2023 | 4Q | 2024 | 2Q | b |
| 321/407/689 | 2043 | 4Q | 2070 | 7Q | -108Q | | | | | 2045 | 3Q | 2019 | 3Q | b,h |
| 321A | 2049 | 2Q | 2078 | 3Q | -117Q | | | | | | | | | b,g,h |
| 448/850 | 2053 | 2Q | 2021 | 3Q | 127Q | 2021 | 3Q | 2021 | 3Q | 2021 | 3Q | 2022 | 1Q | a,f |
| 754/954 | 2047 | 1Q | 2052 | 3Q | -22Q | | | | | | | | | b,h |



Note b: Increased historical and projected demand.

Note e: NPA is at exhaust. No codes available except for returns.

Note h: NPA Exhaust beyond 30 years is not populated for NRUF reporting cycles prior to 2021.1.

Current Active NPA Relief Projects:

| STATE | NPA |
|------------|---------|
| Arkansas | 870 |
| Arizona | 480 |
| California | 209 |
| California | 707 |
| Colorado | 303/720 |
| Florida | 305/786 |
| Florida | 561 |
| Florida | 656/813 |
| Florida | 904 |
| Illinois | 309 |
| Illinois | 708 |
| Maine | 207 |

| STATE | NPA |
|----------------|---------|
| Missouri | 314 |
| Missouri | 816 |
| North Carolina | 910 |
| New York | 516 |
| New York | 845 |
| Ohio | 513 |
| Pennsylvania | 484/610 |
| South Carolina | 864 |
| Virginia | 540 |
| Virginia | 757 |
| Virginia | 804 |
| Wisconsin | 920 |

Jeopardy

When the supply of codes in a particular NPA is at risk of exhausting before a new area code or other relief measure can be introduced, NANPA declares “jeopardy” in that NPA. When jeopardy is declared, code allocations are initially set at a rationing amount of 3 codes with a limit of 3 requests per OCN until the final rationing amount is decided and procedures are developed by the Industry.

Once determined, final jeopardy procedures are posted on the NANPA website (www.nationalnanpa.com). Current final jeopardy procedures allow anywhere from five CO codes to be assigned per month to as few as one.

There were four NPAs in jeopardy at the end of 2020: CA 209, DC 202, IL 217 and 618.

There are now 11 NPAs in jeopardy: CA 209 and 707, **FL 305/786 and 561**, IL 618, MO 314, NY 516 and 845, PA 484/610, OH 513, and VA 540.

In the past year, NANPA rescinded jeopardy in four NPAs when CO codes from the new NPA could be assigned: IL 217, DC 202, and **FL 813**, and VA 757.

NPA Relief Methods

There are generally two types of area code relief: geographic split and overlay:

Geographic Split:

- Provides a single area code for each geographic area and permits seven-digit dialing within an area code
- Requires an area code change for approximately one half of customer's numbers
- Has a permissive dialing period to the new or the old area code

A geographic split could be considered in Florida but there hasn't been an area code split in the U.S. since 2007!

Overlay:

- Overlay provides a second area code within the same geography as the first area code
- Overlay requires 10-digit dialing for all calls within the geographic area
- Overlay will not require existing customers to change area codes
- Overlays are either all-services, concentrated, or boundary elimination

The all-services distributed overlay method is the industry-preferred form of area code relief.

The principal consumer adaptation with an overlay NPA is that 10-digit (or 1+10-digit) local dialing is mandatory.

With the introduction of 10-digit (or 1+ 10-digit) local dialing for the transition of the 988 NXX as an abbreviated dialing code for the National Suicide Prevention Lifeline, 82 NPAs in the U.S are transitioning to 10-digit (or 1+10-digit) local dialing. The Florida 321 (Brevard County), 352, 561 and 941 NPAs are transitioning to 10-digit local dialing because the 988 NXX is assigned as a working NXX in those NPAs. That will leave only the 239, 386, 727, 772, 863, and 904 with 7-digit local dialing.

988 Transition Timeline and Milestones

Timeline:

- After October 24, 2021, but before July 15, 2022, customers must dial 10-digits (area code + telephone number) for all local calls. On and after this date, local calls dialed with only 7-digits may not be completed, and a recording may inform them that the call cannot be completed as dialed. If they get this recording, they must hang up and dial again using the area code with the 7-digit telephone number.

Milestones include:

- Customer education
- Technical actions taken by the Industry to change from 7 to 10-digit local dialing

Impacts to Florida:

- The 321 (Brevard County), 352, 561 and 941 NPAs are transitioning to 10-digit local dialing

Change to Industry Guidelines and Options for Area code Relief:

✓ **Section 5.6.3 was added to the NPA Code Relief Planning & Notification Guidelines.**

“Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.”

****This means that the only option for future area code relief in the 321 (Brevard County), 352, and 941 NPAs is an overlay.****

The remaining area codes with 7-digit local dialing are 239, 386, 727, 772, 863 and 904.

Milestone tracking spreadsheets are available on the NANPA website

https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html

Numbering Resource Utilization/Forecast (NRUF) Reporting Process

NRUF is a semi-annual reporting of utilization and forecast data by all service providers

- February 1 (July 1 - Dec. 31) and August 1 (Jan. 1 - June 30) reporting cycles

NANPA:

- Processes NRUF submissions and responds with confirmation/error notifications (sent within 7 calendar days of submission)
- Sends “Missing Utilization” notifications within 45 days of submission deadline
- Notifies service providers that submitted NRUF but failed to report utilization on assigned codes and/or thousands-blocks
- Sends “Anomalous Notifications” within 90 days of submission deadline
- Notifies service providers that failed to submit any Form 502 to NANPA for the applicable cycle
- Provides service provider-specific NRUF data to state commissions and the FCC 45 days after submission deadline or sooner if requested by the regulator
 - States must have appropriate confidentiality protections in place
 - NRUF data available via NANP Administration System (NAS)
- Provides ongoing updates to NRUF data between reporting cycles.

Service providers update information in order to ensure NRUF on file when requesting initial or growth resources

Routing Number/p-ANI Administration

What is a p-ANI? P-ANI stands for “pseudo–Automatic Number Identification.” P-ANIs permit wireless providers and VoIP providers to provide enhanced 911 location services, generally using 211 or 511 numbers. Wireless service providers that are unable to obtain non-dialable p-ANIs must use their own dialable numbers as p-ANIs.

For more information on p-ANI administration go to www.nationalpani.com

NANPA and the States

- NAS and PAS provide on-line access to numerous queries/reports
 - Real-time code and blocks assigned, available and retained reports
 - Rate center status reports
 - View applications
 - Daily application activity reports
 - Monthly Code Assignment Activity Reports
 - Historical data
- Typical interaction with state regulators includes:
 - Questions about number assignment processes
 - Information requests
 - Carrier authorization questions
 - Reclamation of resources
 - VoIP 30-day notifications and state registration requirements
- Numbering overview tailored to the state
- Quarterly NANPA regulatory update virtual meetings

FCC Orders

- **Pennsylvania Order – September 28, 1998**
- **First NRO – FCC 00-104 – March 17, 2000**
 - Established the framework for number conservation measures
 - Thousands block number pooling framework
 - Sequential numbering
 - Reclamation
 - MTE (Months to Exhaust) and Utilization
 - Reporting (NRUF)
- **Second NRO – FCC 00-429 – December 7, 2000**
 - Utilization threshold
 - Audits
- **Third NRO – FCC 01-362 – December 28, 2001**
 - Safety Valve
 - Declined to require LNP and pooling outside Top-100 MSAs
- **Verizon Forbearance Order – July 16, 2002**
 - Extended the deadline for wireless carriers to provide LNP by one year to November 24, 2003.
 - Number pooling deadline for CMRS carriers will remain November 24, 2002.

Fourth NRO – FCC 03-126 - June 18, 2003

- Carriers must deploy local number portability (LNP) in switches within the 100 largest Metropolitan Statistical Areas (MSAs) for which another carrier has made a specific request for the provision of LNP.
- Delegated authority to the state commissions to require carriers operating in the largest 100 MSAs that have not received a Request for LNP, under certain circumstances and on a case-by-case basis, to implement LNP.
- All carriers, except those exempted, required to participate in number pooling in accordance with the national rollout schedule, regardless of whether they are required to provide LNP, including covered commercial mobile radio service (CMRS) providers not required to deploy LNP until November 24, 2003.
- Exempt rural carrier and Tier III CMRS providers from the pooling requirements if they have not received a request to provide LNP.
- Exempt carriers that are the only service provider receiving numbering resources in a given rate center from pooling .
- Reaffirm that the 100 largest MSAs include those MSAs identified in the 1990 U.S. Census reports as well as those areas included on any subsequent U.S. Census report .
- Declined to expand the list of the 100 largest MSAs to include areas in Consolidated Metropolitan Statistical Areas (CMSAs) that would not otherwise be included in the 100 largest MSAs. Delegate to states authority to require carriers to participate in pooling in such areas.

Interconnected VoIP Access to Numbering Resources – FCC 15-70 - June 22, 2015

- Effective in part on November 30, 2015.
- Numbering rule changes effective February 4, 2016.
- Interconnected VoIP providers can start applying for FCC nationwide authorization on February 18, 2016.
- Once authorization is approved, they must provide proof that a notice was sent to the state 30-days in advance of applying for resources.

NANPA Contacts:

General numbering questions:

Linda Hymans

Sr. Mgr. Contract Performance, NANPA

Phone | 925-420-0345

Email | lhymans@nanpa.com

Web |

www.nationalpooling.com | www.nationalnanpa.com

Industry Relations and NARUC:

Tara Farquhar

Manager, Industry Relations and Customer Education

Phone: | 925-420-0349

Email | tfarquhar@nanpa.com

Web | www.nationalpooling.com

NPA Relief Planning and NRUF:

Heidi Wayman

Manager, Data Management, NANPA

Phone | 571-363-3824

Email | hwayman@nanpa.com

Web | www.nationalnanpa.com

NPA Relief Planning:

Cecilia McCabe

NPA Relief Planner, NANPA

Phone | 925-420-0130

Email | cmccabe@nanpa.com

Web | www.nationalnanpa.com

Reclamation:

Kevin Gatchell

Sr. Resources Administrator, NANPA

Phone | 925-420-0344

Email | kgatchell@nanpa.com

Web | www.nationalpooling.com | www.nationalnanpa.com

What is the Reassigned Numbers Database (RND)?

On December 13, 2018, the Federal Communications Commission (FCC) released a Second Report and Order on Advanced Methods to Target and Eliminate Unlawful Robocalls. In the Reassigned Numbers Database Order, the Commission addressed the problem of unwanted calls to consumers with numbers reassigned from a previous consumer by establishing a single, comprehensive **Reassigned Numbers Database (RND)**.

The RND system securely houses **permanently disconnected** US geographic and toll-free numbers and the date of the most recent permanent disconnection of each of those numbers. After permanent disconnection, numbers must be aged for 45 days (FCC 18-177 ¶ 15).

Permanent disconnection occurs when:

- a subscriber has permanently relinquished a number, or
- the provider has permanently reversed its assignment of the number to the subscriber (FCC 18-177 ¶ 38)
- The requirement to report **permanent disconnects**, incrementally, each month (including disconnects through at least the 10th of month) began May 2021. The 45-day aging requirement means that a number disconnected on the 10th cannot be reassigned to a new customer, until after the next month's RND refresh.
- The requirement is only to report disconnects. Numbers stay in the RND even after being reassigned. Over 140 million numbers have been collected as of October.

General Availability for RND was on **November 1**

Callers and/or their Agents check the RND to determine whether a telephone number has been permanently disconnected from the consumer they intend to reach, thus allowing them to avoid calling consumers with potentially reassigned numbers who may not wish to receive the call and comply with regulatory requirements.



Costs for Using the RND

In the RND Order the FCC determined that Database costs would be recovered from users of the Database. On October 1, 2021, the FCC released a notice announcing the Interim Usage Charges for the RND.

The RND will offer six subscription tiers based on per month subscription queries: Extra Small (1K), Small (10K), Medium (500K), Large (2M), Extra Large (10M), and Jumbo (30M). Those wishing to use the RND may sign up for a one-month subscription, a three-month subscription, or a six-month subscription. The RND Administrator (Administrator) expects to offer an annual subscription option in the future, as well.

The interim tiers and usage charges are the same regardless of whether the subscriber is a caller or a caller agent. Caller agents may register for a tier subscription based on the aggregate number of queries needed for all of their clients, potentially allowing caller agents to register for a higher tier (and thus pay a lower charge per query) than their individual clients would use on their own.

Where can you find
more information?



www.reassigned.us



support@reassigned.us



1-833-763-2366

III. Supplemental Materials for Internal Affairs

Note: The records reflect that there were no supplemental materials provided to the Commission during this Internal Affairs meeting.

IV. Transcript

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROCEEDINGS: INTERNAL AFFAIRS

COMMISSIONERS
PARTICIPATING: CHAIRMAN ANDREW GILES FAY
COMMISSIONER ART GRAHAM
COMMISSIONER GARY F. CLARK
COMMISSIONER MIKE LA ROSA
COMMISSIONER GABRIELLA PASSIDOMO

DATE: Tuesday, March 29, 2022

TIME: Commenced at 11:00 a.m.
Concluded at 11:51 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: DANA W. REEVES
Court Reporter and
Notary Public in and for
the State of Florida at Large

PREMIER REPORTING
112 W. 5TH AVENUE
TALLAHASSEE, FLORIDA
(850) 894-0828

1 P R O C E E D I N G S

2 CHAIRMAN FAY: All right. Good morning,
3 everyone. Welcome to the March 29th internal
4 affairs meeting. I would like, as I've done in
5 previous meetings, just to recognize our employees
6 of the month. So we're actually getting a sort of
7 two-for-one today in that we have recognition of
8 Margarita Valdez de Gonzalez, who works in our
9 consumer assistance division, and is critical to
10 our team for another -- for a number of reasons,
11 but probably most importantly it's that Margarita
12 is one of our Spanish-speaking assistants and has
13 been very busy with communications in South Florida
14 and making sure that we're responsive to all of
15 those calls and emails that we receive. So we're
16 grateful to her and thankful and recognize her as
17 our Employee of the Month for February.

18 For March, we're going to recognize -- yeah,
19 we can clap for. I think even though she's not
20 here.

21 (Applause.)

22 CHAIRMAN FAY: With March, we're lucky because
23 we do have somebody here for me to embarrass, and
24 that's Adria Harper, who works in our legal
25 division. She's back there to your right. I spoke

1 recently about Adria's work in presentation of oral
2 argument in front of the Supreme Court, which I
3 thought she did a fantastic job, but I think it's
4 probably also appropriate to recognize some of the
5 things that -- that are done not so publicly, and
6 that's working with all the Commission as it
7 relates to the requirements in 350 and the ethics
8 requirements that apply to what we do. In addition
9 to that, she works through all of the public
10 records requests that we get, which can be
11 extremely time-consuming and challenging, but we're
12 grateful to her patience, to make sure that we're
13 responsive and provide what we're supposed to
14 provide under those requirements.

15 So, with that, we will recognize Adria Harper
16 as our Employee of the Month for March and she gets
17 another clap. She's so great.

18 (Applause.)

19 CHAIRMAN FAY: Hopefully I embarrassed you
20 appropriately, Adria. So thank you for that. And
21 thank you, Commissioners, for allowing me to
22 present that at IA.

23 With that, we'll move into our presentation
24 this morning, through the North American Numbering
25 Plan Administrator, we have Linda Hymans and Heidi

1 Wayman, who are presenters. We do have the
2 presentation slides up, and I believe we have both
3 speakers available at this time. Make sure. Are
4 they on the line or --

5 MS. HYMANS: We are here.

6 CHAIRMAN FAY: All right. You are there. We
7 can hear you. If you could, I'll allow you to just
8 do a really brief introduction of yourselves, and
9 then if you could present the information for us.
10 We do have a copy of the slide presentation in
11 front of us, both as hard copies and virtually. If
12 the Commissioners would like, they may interrupt
13 you during the presentation, just to ask for a
14 clarification or questions that they may have. If
15 not, we can ask you some questions at the end.
16 And, just know how busy you are. Appreciate you
17 working with us to make this work. And we're glad
18 with the time zone change we didn't have to get you
19 up at 5:30 a.m. to present us this morning about
20 this work. Appreciate your patience with the
21 scheduling.

22 So, with that, I'll turn it over to you.

23 MS. HYMANS: Well, my name is Linda Hymans and
24 I'm the Senior Manager for Contract Performance
25 with the North American Numbering Plan

1 Administrator, known as NANPA. I joined NANPA from
2 the Texas PUC where I worked a number of
3 conservation measures with many other states,
4 including Florida in July 1999, and I act as the
5 regulatory liaison and on contract performance for
6 NANPA. Heidi.

7 MS. WAYMAN: Thanks, Linda. My name is Heidi
8 Wayman and I am the Manager of Data Management with
9 NANPA. I oversee relief planning, data reporting
10 and NRUF. I've worked under the NANPA contract
11 since May of 2000. I've held various positions
12 within the NANPA organization, including code
13 administrators, senior AOC administrator, and P-ANI
14 relief planner, and then my current position.

15 MS. HYMANS: Okay. Are we ready to get
16 started?

17 CHAIRMAN FAY: We are ready. You're welcome
18 to proceed.

19 MS. HYMANS: All right. Slide two. I'm going
20 to be going through these slides fairly quickly, so
21 we just -- so that we take care of the time
22 constraints.

23 On slide two, we talk about neutrality for
24 NANPA. NANPA and the PA are partial that we're not
25 aligned with any particular telecommunications

1 industry segments, and we work under contract with
2 the Federal Communications Commission.

3 Next slide. The first NANPA contract was
4 awarded in 1997 and Thousands-Block Pooling
5 Administration in 2001. NANPA and Pooling
6 functioned under separate and competitively bid
7 contracts. In 2018, these functions transitioned
8 from New Start to Somos under a bridge contract.
9 And then in December 2020, after a competitive
10 bidding process, Somos.gov, which is a wholly-owned
11 direct subsidiary of Somos, was awarded the NANPA
12 contract and the NANPA and pooling organizations
13 were combined. So we no longer have separate
14 organizations.

15 Next slide. NANPA responsibilities include
16 essential office code. CO stands for central
17 office code and Thousands-Block assignments,
18 numbering plan area. And the numbering plan area
19 is the equivalent of an area code, means the same
20 thing. We do the relief planning when an area code
21 is running out of prefixes. Numbering resource,
22 utilization forecast report processing. That is
23 what referred to as NRUF. And then there are other
24 resources that we also administer, such as 5XX
25 codes and 900 numbers. So those are the types of

1 things that NANPA handles.

2 We also handle routing number administration
3 or P-ANI. P-ANI's are pseudo automatic number
4 identifiers, and those are used for their
5 non-dialable numbers used to provide enhanced 911
6 location services.

7 Next slide. Rules of the Road. Very simply,
8 NANPA must follow first the FCC rules, and we list
9 them on the slides, some of them. FCC contracts
10 that we have that we work under and industry
11 guidelines, and their industry guidelines for
12 relief planning for central office code
13 administration for Thousands-Block pooling.

14 So I will turn it over now to Heidi for slide
15 six.

16 MS. WAYMAN: Thanks, Linda. The North
17 American Numbering Plan, or the NANP, was developed
18 in 1947. You can see on this we've had steady
19 growth through '95. And then in '96, the
20 Telecommunications Act was implemented and you can
21 see the competitive surge with 163 area codes by
22 the end of '96 that were assigned. From '97 to
23 2001, you can see a large growth period. And then
24 in 2002 to the present, we have the implementation
25 of Thousands-Block's number pooling, as well as the

1 authorization for interconnected voice -- VoIP to
2 obtain numbering resources. You can also see there
3 that as of the October 2021 NANP exhaust
4 projection, and NANP is projected to exhaust in
5 2063.

6 Going to slide seven. The 305 was the
7 original area code and it served the entire state
8 of Florida. It has been split several times and
9 the new area codes introduced were 813, 904, 407
10 and 954. You can see the splits are shown there in
11 blue. The overlays are the white squares. The 813
12 has been split twice, which created the 941 and
13 727. The 904 was split, creating -- three
14 different times, creating 352, 850 and 386. 417 --
15 407 was split creating the 561. The 561 was
16 additionally split creating 772. And then the 954
17 was split creating the 863.

18 The first overlay introduced was in '98, a 786
19 overlaid the 305. And then after the two splits,
20 941 and creating 239 in 2002, as well as the 561
21 split creating the 772. There wasn't additional
22 relief needed until 2019. The Commission actually
23 approved an overlay for the 321, 407 overlay back
24 in 2002. However, the projected exhaust date was
25 moved out and the Commission suspended that order.

1 And then Thousands-Block number pooling was
2 implemented and relief was not needed again until
3 2019 when the 689 was introduced.

4 You can also see the most recent projects in
5 2021, the 448 was introduced over 850, 656 over the
6 813. 728 is coming shortly over the 561. And just
7 approved is the 645 over the 305, 786.

8 Moving to slide eight. This is a map that is
9 shown on the NANPA website of the Florida area
10 codes. The area codes listed in blue are overlay
11 area codes.

12 I'll hand it back over to Linda. Start slide
13 nine.

14 CHAIRMAN FAY: Slide nine talks about the
15 introduction of Thousands-Block pooling, which
16 we've mentioned here has, you know, forestalled
17 area code relief. Thousands-Block number pooling
18 is the distribution of telephone numbers in blocks
19 that were in blocks of 10,000. We now do them in
20 individual blocks. So Central Office code has 10
21 blocks of 1000 numbers. And the FCC recognized
22 that giving out the numbers in full blocks of
23 10,000 was one of the major drivers of the exhaust
24 of the NANP. So number pooling, it allows a block
25 of numbers, like the 1000 block or the 2000 block

1 of a telephone prefix, to be shared among multiple
2 service providers within the same rate area or
3 exchange.

4 In 2001, the FCC required participation in
5 pooling in top 100 MSA's unless they were exempted.
6 And some of the exemptions would be, for instance,
7 paging carriers are exempt, or some rural carriers
8 were exempt, and also in all areas that were
9 designated as mandatory as a result of a state
10 regulatory mandate. And we'll talk about that a
11 little bit, because Florida does have that.

12 MSA's, or the Metropolitan Statistical Areas,
13 designated any time to be in the top 100 remain
14 mandatory, even if they drop out due to population
15 changes. So, in addition to our current top 100
16 MSA's, there are 63 MSA's that are no longer in the
17 top 100, but where there is mandatory pooling. And
18 the national rollout for pooling began in 2002.

19 Slide 10 is a depiction of how Thousands-Block
20 pooling works, that I just described to you. You
21 see that Service Provider A is assigned as the
22 responsible holder of that central 222 Central
23 Office code, but there are 10 blocks in that
24 Central Office code. So Service Provider A can
25 return -- keep one block, return the remaining

1 blocks to the pool, and the other service providers
2 can use them.

3 Slide 11 talks about the benefits of
4 thousands-blocks pooling, obviously reducing the
5 depletion of an area code by allowing carriers to
6 take blocks in 1000 instead of 10,000. Also, there
7 is the ability to utilize slightly, what we call
8 contaminated blocks, meaning that they are -- some
9 numbers are assigned. So as long as there's less
10 than 100 numbers assigned, a block can be used by
11 another service provider, and it's not
12 customer-affecting. And Heidi's already spoken to
13 the fact that Thousands-Block pooling helps
14 postpone area code relief in Florida.

15 Twelve -- slide 12, Florida did petition for
16 and was granted delegated authority by the FCC to
17 implement pooling prior to the national rollout.
18 The national rollout did not begin until 2002, but
19 the Florida PSC implemented pooling between 2000
20 and 2001 in what we call pooling trials in the 239,
21 305, 561, the 754, 954, 772, 813, 904 and 941 area
22 codes.

23 There are nine top 100 MSA's in Florida. And,
24 again, if a rate center was implemented under the
25 delegated authority, it remained mandatory, but the

1 federal designation took place -- takes the place
2 of the state's mandatory designation. They all
3 stay mandatory, but there are different
4 designations. There's a mandatory federal and
5 mandatory state, which we call a red M. In every
6 area code in Florida, at least one rate center is
7 in an MSA except for in the 448, 850 which is --
8 there is a Tallahassee MSA, but it is ranked at
9 142.

10 Slide 13. This gives you detail about the
11 rate center designations. And as I mentioned to
12 you, there's FCC mandatory, which is just M.
13 There's state mandatory, which is red M. There's
14 also a optional -- there are optional rate centers.
15 And there are -- there's one excluded rate center.
16 The one excluded rate center is Hosford in the 448,
17 850. That's the only excluded rate center in
18 Florida.

19 There are eight areas that are all mandatory,
20 either federal or combined with state, and that's
21 the 239, 305, 321, 561, 813, 727 and the 754, 954.
22 The 352 has the most rates centers, or exchanges,
23 and that's 48, and also the most optional.

24 So next slide talks about number -- rate
25 center consolidation, which is one other method

1 aside from Thousands-Block number pooling that can
2 be used to try and conserve the number of Central
3 Office codes that are assigned. This allows for
4 rate centers to be consolidated. For instance, you
5 know, there could be four rates centers that are in
6 a certain area that cover a certain local calling
7 area. You could conserve -- you can eliminate the
8 boundaries for those and make them one rate center.
9 This method of conservation is very forward-looking
10 because it only works to slow the exhaust of an
11 area code, if it actually reduces the number of
12 Central Office codes that are being opened.

13 Slide 15 talks about opening Central Office
14 codes. Central Office codes, again, the
15 three-digit prefix of a telephone number are
16 generally open for what we call a location routing
17 number, for pool replenishment or for a dedicated
18 customer. For an LRN, or location routing number,
19 the service provider must be the code holder. In
20 other words, they're responsible for routing the
21 code. There can only be one per code.

22 Pool replenishment is used when there are not
23 enough available blocks in the rate center pool to
24 meet forecasted demand. And a dedicated customer
25 request is for a full Central Office code. All

1 10,000 numbers for one customer cannot be used for
2 any other customers, but it does require a letter
3 from that customer saying they need to have that
4 code. The reason this is important and the reason
5 we're discussing it is that area code relief, or
6 when you need a new area code, is when the
7 projected demand exceeds the number of available CO
8 codes to meet that projected demand.

9 Slide 16 is the typical application process or
10 workflow. And this is also interesting because you
11 have what we call initial Central Office codes.
12 That's when blocks are assigned for the first time,
13 and that's blocks for CO codes for the first time
14 that a service provider is requesting numbers in a
15 rate center. Supporting documentation is required
16 for all of these. What we mean by this is that
17 they have to prove that they are going to have the
18 facilities ready to open up those Central Office
19 codes for use, if they have the appropriate
20 authorization, whether it be from the state or from
21 the FCC, whether they needed a state waiver. And
22 the reason they would need a state waiver is for --
23 if they don't qualify to get those resources.

24 A growth Central Office coder block means that
25 they already have resources in that rate center,

1 but they need more. In that case, they must also
2 meet months-to-exhaust and utilization to obtain
3 the blocks and the codes. Months-to-exhaust means
4 that they are certifying that that -- those codes
5 will exhaust within six months. Seventy-five
6 percent utilization is what they must attain, as
7 well, within that time period. So if they do not
8 meet those parameters, they are not allowed to get
9 new numbering resources, whether they be CO codes
10 or for blocks.

11 And I will now turn it over to Heidi for slide
12 17.

13 MS. WAYMAN: Thanks, Linda. So NANPA's relief
14 planners notify the local industry and the state
15 commission when an area code is going to exhaust.
16 NANPA does review the dialing arrangements,
17 communities of interest and other pertinent issues
18 to identify viable relief methods. Those are all
19 put into what's called an initial planning
20 document, or IPD, and that is distributed to the
21 industry. NANPA facilitates a meeting with the
22 industry so they can consider all the relief
23 options presented in the IPD, as well as they have
24 the opportunity to present additional relief
25 methods that they want reviewed. Once consensus is

1 reached by the industry on the relief method, NANPA
2 does prepare a petition explaining the options
3 considered and describes the recommended relief
4 option. NANPA then files that petition on behalf
5 of the industry with the state commission for
6 approval, and the commission is responsible for the
7 final decision concerning area code relief, the
8 method that will be implemented.

9 So once NANPA receives a decision from the
10 commission, we assign the new area code and
11 facilitate a meeting so the industry can set the
12 implementation dates for the new area code.

13 Moving to slide 18. NANPA reviews exhaust
14 data, which is published twice a year, that's April
15 and October. So we do have a next set of
16 projections being posted next month. If there is a
17 need to revise the exhaust forecast prior to the
18 next publication date, NANPA will issue what's
19 called a Delta NRUF. As you can see, we did have
20 to do that in January of 2022 for three area codes
21 in Florida.

22 Moving to slide 19. These are the elements
23 that are looked at when determining the exhaust of
24 an area code. And, as I stated before, area code
25 relief is initiated when we are within 36 months of

1 projected exhaust. When we look at historical code
2 assignment data, we're looking at the service
3 provider forecasts, a number of unavailable as well
4 as available codes, the number of rate centers in
5 an NPA, or area code, and the number of carriers.

6 So 20. Why does Florida have so many NPA
7 relief projects? Well, as you will see in the
8 slide I'm going to show you right after this one,
9 Central Office code assignments are up, as well as
10 you no longer have just one phone in the house.
11 Typically, there are multiple phone lines in the
12 same household. There's also technologies that use
13 phone numbers, such as tablets and watches and even
14 vehicle safety and security systems. You have
15 carriers expanding their footprint, as well as new
16 carriers that are now allowed to get numbering
17 resources, as we touched on, which are the
18 interconnected VoIP providers.

19 Moving to slide 21, these are the assignments
20 since 2018 in Florida area codes. You can see
21 there's been an upward trend over the last few
22 years, 202 assignments in 2018 to 490 in 2021.

23 Moving to slide 22. This is the exhaust
24 projections that are posted to the NANPA website.

25 This shows you the data for Florida from April 2019

1 through October 2021. As I said, the next exhaust
2 projections will be posted next month and all of
3 this is available on the NANPA website.

4 Going to slide 23 are some of the current
5 active relief projects NANPA is working on. You
6 will see there are four projects for Florida. The
7 656, 813 was just recently implemented. The new
8 656 area code was put in service February 22nd.

9 Going to slide 24. I'd like to talk a little
10 bit about jeopardy. So when an area code is at
11 risk of exhausting, before a new area code can be
12 implemented NANPA declares jeopardy. And when
13 there is an area code in jeopardy, it is -- there's
14 rationing put in place. So when that happens,
15 initially the rationing is set at three codes can
16 be assigned per month, and then NANPA will gather
17 the industry -- and the industry makes the
18 determination on the final procedures, which
19 include the amount of codes that can be rationed
20 each month to the carrier. So they have a
21 submission time frame, usually the first through
22 the fifth business day of the month, where they can
23 submit their request. And, for instance, if there
24 are two codes rationed per month, if there are
25 three or more requests, then it goes into a lottery

1 and the winners are drawn from that.

2 Moving to slide 25. This goes over the area
3 code or NPA relief methods, which are typically
4 either a geographic split or an overlay. A split
5 would leave the existing area code to serve one
6 side of the geographic area and assign a new area
7 code to the remaining area. It does allow -- it
8 does permit seven-digit dialing, but about
9 approximately half of the customers would have to
10 change their area code. An overlay would
11 superimpose a new area code on top of the
12 geographic area of the first area code. Does
13 require 10-digit local dialing. However, customers
14 do not need to change their telephone numbers.

15 Going to slide 26, the FCC mandated the 90-day
16 is the three-digit access code to be used to reach
17 the National Suicide Prevention Lifeline. So area
18 codes that have the 988 as a working assigned
19 prefix have to transition to 10-digit dialing.
20 Florida did have four area codes transition to
21 10-digit dialing. As you can see, there'll be six
22 remaining area codes that will still maintain
23 seven-digit dialing. So those are the last six in
24 the state that will have seven-digit dialing.

25 Milestones were put in place to ensure the

1 successful transition and implementation of the
2 90-day code. And the cover providers are to report
3 milestone completion to NANPA. And the aggregate
4 data is provided on the NANPA website.

5 Next slide, slide 27, NANPA is responsible for
6 the collection and reporting of utilization and
7 forecast data, which is known as numbering resource
8 utilization forecast, or NRUF reporting. Service
9 providers are required to report utilization and
10 forecast data twice a year. Utilization data
11 includes the quantity of assigned intermediate,
12 aging, administrative and reserved numbers. And
13 the forecast data typically is comprised of a
14 five-year forecast of the quantity of
15 thousands-blocks and/or codes by rate center.

16 NANPA does send out missing utilization
17 notifications to any carrier who has filed an NRUF
18 for the current cycle, but they have not filed
19 utilization for all numbering resources. We also
20 send out anomalous notifications, and those go to
21 the carriers who have not filed any NRUF for that
22 NRUF cycle.

23 Now I'll hand it back to Linda for the
24 remaining slides.

25 MS. HYMANS: Okay. On slide 28, we've already

1 discussed a little bit routing number or p-ANI
2 administration. Again, the p-ANI's permit the
3 wireless and VoIP providers to provide enhanced
4 911.

5 Slide 29. We talked here a little bit about
6 our support for the state. The NAS and PAS, just
7 so that you're aware, the NAS is the NANP
8 administration system, and PAS is the pooling
9 administration system. Currently, they are two
10 separate systems, and part of the combined
11 organization. They will be combined, but right now
12 they are still separate, but you can access a lot
13 of information through our systems regarding the
14 applications that come in that can be viewed. And
15 status of rates centers, you can look at the
16 forecasts, and which companies are actually
17 submitting the forecast.

18 In addition to that, we provide other support
19 to the states. We respond to questions and
20 information requests. We handle reclamation, if
21 reclamation is appropriate. Carriers are allowed
22 six months to put a code or a block in service. If
23 it goes back past that time, that block or code can
24 be reclaimed with the authorization of the state.
25 And I -- we also notify the states about the voice

1 applications that come in that require opening a
2 Central Office code, namely an LRM. We do
3 numbering overviews and we also meet quarterly with
4 the states for updates.

5 Next slide, slide 30 is just a summary for
6 you. If you're interested in looking back at some
7 of the orders that relate to numbering, this gives
8 you the order numbers so you can find them easily.

9 Slide 31, this is for your convenience to have
10 questions regarding -- if you have any questions,
11 these would be the NANPA contacts.

12 And then the slides 32 through 34, we added
13 this because the reassigned numbers database is
14 technically under the NANPA contract, but it is a
15 separate organization, but this -- the reassigned
16 numbers database was put into effect by the FCC to
17 curb robocalling and it's permanently -- the RND
18 system permanently houses disconnected U.S.
19 geographic and toll-free numbers and the date of
20 the most recent permanent disconnection for those
21 numbers. So we just included this information so
22 that you would have it. There are costs for using
23 the RND. All of that information is available on
24 the website for RND, and that is www.reassigned.us.

25 And that concludes our presentation. Thank

1 you. Are there any questions?

2 CHAIRMAN FAY: Thank you for your
3 presentation. My first question is, I don't
4 understand how you come up with the numbers,
5 honestly. Very impressive. Appreciate you walking
6 us through that.

7 I do have a few quick questions and then I'll
8 let my colleagues ask if they have anything that
9 they want clarification for. And, of course, we do
10 have our staff here, Greg Fogleman, Sakina Deas,
11 who have been working with you. So if it's a
12 question that's more targeted at the Commission
13 responsibilities, you can always redirect to them
14 just for the clarification.

15 On your slide 22, which has the exhaust and
16 the projections and history, when we look at that,
17 obviously, some numbers have moved quicker than
18 others, and I think near the bottom you've got the
19 321A there where you've got -- you have an initial
20 estimation that it would, in January of 2021, that
21 it would exhaust in 2078. And then in the second
22 half of 2021, you have a prediction that it would
23 exhaust in 2049. Can you just explain what drives
24 an almost 30-year change in six months? Either of
25 you can answer. I guess whoever wants to be the

1 victim here. Go ahead. Go ahead.

2 MS. WAYMAN: I've got it. Right. So, like I
3 said, we look at the amount of service providers in
4 the area, the amount of available and unavailable
5 codes and the historic growth assignments. So
6 there was probably a large amount of assignments
7 going from April to October, so -- and then just to
8 let you know, the 321A, the 321, 407 and 689 was an
9 overlay. The 321 was then held for just Brevard
10 County, so that's why it's separated out. There
11 are 321 assignments in the 407 and 689 area, and
12 then the 321A are just the Brevard County
13 assignments.

14 CHAIRMAN FAY: Okay. And then I'll switch it
15 to one other slide. When you mentioned the delta,
16 which I think is slide 18, when that comes up, it's
17 essentially, I guess, change that needs to occur in
18 between the April and the October online. Is
19 that -- is that essentially -- and I don't mean
20 this in a negative way, but is that sort of a
21 miscalculation or a false prediction that drives
22 that to be expedited in between that time line, or
23 is that something that's more driven by external
24 factors?

25 MS. WAYMAN: It's driven by external factors.

1 So the exhaust does come out twice a year, and then
2 if there is a need to -- in this case, the relief
3 planner was working on the project for 904. We did
4 see exhaust move in for the 904, and then there was
5 relief options that were included for the other two
6 area codes. So we wanted to provide the most
7 recent up-to-date data for the industry to make
8 their determination when they were picking the
9 relief option to be presented to the Commission.

10 CHAIRMAN FAY: Okay. Great. And I know
11 different states are losing population, and, of
12 course, we're growing. So this tends to be a
13 bigger issue for us. But my last question is just
14 on the -- this is in part a personal question, too,
15 in that we have the NXX, which are the dialing
16 numbers. If we have something like the suicide
17 prevention line, or 911 that's commonly used, if
18 you have a seven-digit dialing, is it possible that
19 the NXX would be a 988 or another number that then
20 would immediately transfer somebody to the suicide
21 line and essentially use up those resources,
22 compared to if everyone was on 10-digit dialing,
23 that wouldn't be an issue?

24 MS. HYMANS: That is the reason that they're
25 changing over to 10-digit dialing in the area codes

1 that have the 988 Central Office code or NXX
2 assigned, is to alleviate that problem. So people
3 will be required to dial 10 digits in those area
4 codes.

5 CHAIRMAN FAY: Okay. And do you know if
6 essentially they dial those first three numbers, if
7 it automatically takes them to that line, or if
8 there's a pause and essentially then they keep
9 dialing the rest of the number? Are you saying
10 that they've all been removed, so that's not an
11 issue?

12 MS. WAYMAN: Well, they have until July 15th
13 to remove the seven-digit dialing. So -- and the
14 public has been notified they need to dial 10
15 digits by October 24th of 2021. So they have been
16 educated they should be dialing 10 digits. Up to
17 the service providers to have that completed by
18 July 15th.

19 CHAIRMAN FAY: Okay. Great. And then I know
20 you communicate with our staff, but, of course, if
21 there's anything that we can do as far as customer
22 notice that you think is appropriate, please let
23 either Greg or Sakina know to make sure we can do
24 our part to make sure they have that information.

25 And I promise this is my actual last question,

1 but have you considered just a statewide sort of
2 mandate for 10-digit dialing, just to avoid sort of
3 the constant changing of which area is transferring
4 to this or not?

5 MS. HYMANS: This would not be something under
6 the NANPA purview. Generally, the dialing plans
7 are under the states and the service providers -- I
8 mean, actually, you know, when they created the
9 NANP, I mean, AT&T determined what the dialing was
10 going to be at the time. But, generally, it's
11 under the purview of the states. But, of course,
12 the FCC could take it up, as well, if they choose
13 to do a nationwide plan, but that would not be
14 under the purview of the NANPA.

15 CHAIRMAN FAY: Okay. Great. Thank you.

16 All right. That's all I have. Commissioners,
17 any questions? If not, we appreciate all your time
18 and presentation. Also, just want to thank our
19 staff for working with these folks. And if we do
20 have continued questions, we'll reach back out to
21 you. But, obviously, with the growth of the -- and
22 I think Greg, correct me, I think five numbers, I
23 think we're the largest in the country at this
24 point, is that correct -- okay. So at this growth
25 rate, we anticipate probably having more of these

1 and they'll come before the Commission to make
2 decisions on them. But whatever information you
3 can have to sort of preemptively make sure we know
4 those numbers will be exhausted is greatly
5 appreciated. So thanks again for your time.

6 MS. HYMANS: Our pleasure.

7 MS. WAYMAN: Thank you for having us.

8 CHAIRMAN FAY: All right. Sakina or Greg,
9 anything else? Great. Okay. Thank you, guys.

10 All right. With that, we will move on to our
11 next agenda item for our IA, which is our
12 legislative update. Ms. Slattery, you're
13 recognized.

14 MS. SLATTERY: Good morning. Can you hear me
15 okay?

16 CHAIRMAN FAY: We can. Thank you.

17 MS. SLATTERY: So the legislative session for
18 2022 ended a couple of weeks ago on March 14th, and
19 we just wanted to update you on a few bills that
20 passed and did not pass.

21 First up, we have the Lifeline Bill, Senate
22 Bill 7036, which was the cleanup to the Lifeline
23 statute, which PSC staff assisted House and Senate
24 staff on technical language. The Senate bill
25 passed both chambers unanimously, and it will await

1 the Governor's final approval.

2 Next, we have the House version of the net
3 metering bill, which is the final version that
4 passed, and it passed both chambers of the
5 legislature early on the last week of session, and
6 it has not been sent to the Governor yet. As soon
7 as the bill is presented to the Governor, he will
8 have 15 consecutive days to act on the bill. So
9 he'll either approve it, veto it or he doesn't have
10 to do anything at all, and it'll go into effect
11 automatically.

12 And then we have the floating solar facilities
13 bill, which is the House Bill 1411. It passed both
14 chambers of the legislature and is also waiting to
15 be presented to the Governor. The bill prohibits
16 the construction of floating solar facilities to be
17 built in Everglades Agricultural Area Reservoir
18 Project -- say that 10 times fast -- and gives
19 local governments jurisdiction over amending
20 development regulations if a negative impact is
21 found in the construction area for these
22 facilities.

23 And then we have the Waste to Energy Bill,
24 which is Senate Bill 1764. It passed both chambers
25 of the legislature, as well, and is also waiting to

1 be presented to the Governor. The bill establishes
2 the municipal waste -- Solid Waste to Energy
3 Program, within the Department of Agriculture and
4 Consumer Services, and is comprised of a financial
5 assistance grant program for qualifying facilities.
6 PSC is also required to assist FDACS with verifying
7 eligibility and the amount of energy purchased from
8 the facility. And then FDACS is then tasked with
9 administering the grant funds.

10 And then a couple of bills that did not pass
11 that we tracked anyway, the EV, Electrical Vehicle
12 Transportation Electrification Plan. Both bills
13 also would have required the PSC to adopt rules for
14 an electric vehicle transportation electrification
15 plan to facilitate the deployment of EV charging
16 infrastructure in a competitively neutral manner.
17 Both bills only passed one committee and never were
18 heard in the second.

19 And then we also had House Bill 337 and Senate
20 Bill 536, which were the admin procedures bill,
21 which would have required all state agencies to
22 review its rules on an annual basis and
23 re-promulgate any rules that met the criteria set
24 forth in the legislation. However, both bills
25 passed each of their three committee stops, but

1 we're indefinitely postponed and withdrawn from
2 consideration on the House and Senate floor.

3 And that's basically all we have. We will be
4 giving an update on the budget once the Governor
5 signs it, hopefully, later in the summer.

6 And I think that's it. Any questions?

7 CHAIRMAN FAY: Great. Thank you. Just one
8 quick question. So, essentially, the bills that
9 did pass once they hit the Governor's desk, I mean,
10 they're -- the time -- the 15 days doesn't start
11 until the bill's actually received by their office,
12 is that right?

13 MS. SLATTERY: Correct. Once it is laid on
14 the Governor's desk, he has that 15-day clock. And
15 then that's after session. During session, if he's
16 presented with the bill, he has seven days.

17 CHAIRMAN FAY: Okay.

18 MS. SLATTERY: Not applicable now, but --

19 CHAIRMAN FAY: Right. Okay. Thank you. Any
20 questions? Oh, Mr. Graham, you're recognized.

21 COMMISSIONER GRAHAM: Thank you, Mr. Chairman.
22 What are the significant differences between the
23 House and Senate in the net metering bill?

24 MS. SLATTERY: There's a couple of
25 differences. I'd be happy to talk with you in your

1 office after. It's -- it's a long list.

2 COMMISSIONER GRAHAM: There's quite a few
3 differences?

4 MS. SLATTERY: I'm sorry?

5 COMMISSIONER GRAHAM: There's quite a bit of
6 difference between --

7 MS. SLATTERY: There's a couple. There's a
8 couple of technical differences that just both of
9 them didn't align.

10 CHAIRMAN FAY: Any other questions? Thank you
11 for the update.

12 MS. SLATTERY: Thank you.

13 CHAIRMAN FAY: All right. With that, we will
14 move to the general counsel's report. Mr. Hetrick,
15 you're recognized.

16 MR. HETRICK: Yes, thank you, Mr. Chairman.
17 First, I have a couple of things. I'll just take
18 two or three minutes here. First, I'd be remiss if
19 I didn't echo Commissioner Fay -- Chairman Fay by
20 saying hats off and well deserved to Adria for her
21 Employee of the Month Award. For me, it's been fun
22 watching her confidence grow over the years. She's
23 really come into her own. She's an outstanding
24 lawyer and we're just lucky to have her. So thank
25 you again, Adria. Well deserved.

1 A couple things. Administrative, we just
2 hired a new lawyer, Jon Rubottom. He's an FSU
3 undergrad, very recent University of Tulsa law
4 degree. He came to us with an already-established
5 interest and experience in energy law. And,
6 uniquely, he was really qualified. He is a rare
7 find to put into Samantha's appellate law section
8 as an entry-level attorney. He's that good from a
9 writing and oral argument. So we're really proud
10 and excited to have -- welcome Jon Rubottom.

11 A couple of things on what's going on in our
12 unit right now. We've got a number of appellate
13 matters going on. You probably know that we had
14 two recent oral arguments earlier this year, where
15 we're waiting decisions now from the Florida
16 Supreme Court. One is DEF's fuel cost to recovery
17 for its forced outage at the Bauder -- at the
18 Bartow Unit 4 matter. And we're waiting on a
19 decision in that case. And the other is DEF's
20 clean energy connect program settlement agreement,
21 which was orally argued recently a couple of weeks
22 ago by Adria Harper. And I thought if any of you
23 watched that, it was a very long oral argument, a
24 very -- and Adria held her own. She was absolutely
25 unflappable.

1 CHAIRMAN FAY: I think they threw the time
2 lines out the window. They just kept asking
3 questions.

4 MR. HETRICK: Yes, it was an intense case.

5 So we also have two decisions where we're
6 getting ready to respond to initial briefs after
7 their receipt. One is the Florida Rising and
8 FAIR's Challenge. That's Floridians Against
9 Increased Rates, the FAIR group's appeal of the FPL
10 rate case. The other is OPC recently appealed the
11 Commission's final order that addressed the
12 replacement power costs for the DEF's Crystal River
13 Unit 4 outage. So that's on appeal that -- briefs
14 have been sent in that case, too. So we'll be
15 responding to those.

16 We also have an active rule challenge going
17 on: The pole attachment rule challenge. Want to
18 let you know that scheduled for hearing on April
19 19th. Katherine Cowdery is handling that matter,
20 but because it's a 30-day expedited hearing, all
21 lawyers in the appellate section are kind of on
22 deck and working on that case, working on discovery
23 requests, and we're very confident about prevailing
24 in that case. And then we've got some post-hearing
25 decisions that are -- be coming your way on May

1 3rd. You've had two litigated cases already this
2 year. The First Coast's application for water and
3 wastewater certificate, and then the environmental
4 utilities wastewater certificate, both of which
5 went to hearing.

6 And, finally, we've got a couple of hearings
7 scheduled over the summer. The FPL transmission
8 line need hearing is scheduled on May 16th. The
9 three cost recovery dockets for storms that
10 impacted FPL and Gulf are scheduled for July 7th
11 and 8th, and then the IOU storm protection plans
12 are scheduled in August, August 2 through 5. Then
13 let's not forget in May also, May 17th, the
14 hurricane preparedness workshop. And then sometime
15 in June, I think the 10-year site plan workshop.
16 Should be interesting workshop this year.

17 So that's kind of my report of all the things
18 that we're involved in. I was promised when I
19 first came here that there would be a lull, and
20 still haven't seen it yet.

21 CHAIRMAN FAY: I'm not sure you're going to
22 see that, Mr. Hetrick. With that, any questions?

23 Great. Thank you, Mr. Hetrick, for your
24 update.

25 Next, our Executive Director, Mr. Baez.

1 MR. BAEZ: Thank you, Chairman. Good morning,
2 Commissioners. I just wanted to echo your thanks,
3 Chairman, to the folks at NANPA for their
4 presentation today. You know, new area codes and
5 numbering relief is only a small part of what the
6 Commission does on their daily work, but it is
7 emblematic of the realities, in a general sense,
8 that you all deal with every day, and that's growth
9 and how to manage the resources and how to manage
10 addressing Florida's growth. And I think if you
11 can -- if you took something from the presentation
12 this morning, as you saw all the arrows and all the
13 estimates of exhaustion and the like, all moving
14 closer to zero. And sometimes that's just part of
15 the projection function, you know, you start out
16 far and as the time nears, your projections get
17 thinner. But I think that the message is clear,
18 that as Florida's a growing state, we have more and
19 more of these issues faster and faster. And I
20 don't -- I don't have to tell you that that's not
21 limited to the telecommunications area. It really
22 is an overarching aim for everything that you do.
23 And as somebody who can remember the first time the
24 Commission dealt with the issue of 10-digit
25 dialing, I think the hysteria over having to dial

1 10 digits was perhaps slightly less than the Y2K
2 crisis, and we all know how that one turned out.
3 In any case, thanks to NANPA, for reminding us of
4 everything that goes on behind the scenes to get
5 some good data and good estimates to the Commission
6 to consider a numbering plan relief.

7 Secondly, I wanted to -- I wanted to thank the
8 PSC staff for bringing their expertise and their
9 experience to bear on all the relevant bills that
10 were filed. This session, as it happens every
11 session, they make a valuable and substantive
12 contribution to the laws of this state as they
13 support the work of the legislature, and it should
14 never be -- it should never go unmentioned. So
15 thanks to them. And a special thanks to our
16 legislative relations group, Kayley Slattery and
17 Katherine Pennington, for herding the cats and
18 keeping us informed, as well of all the goings on,
19 on a daily basis throughout.

20 With that, just want to add to the calendars,
21 your next agenda conference is next week, next
22 Tuesday, April 5th, and the Commission will be
23 meeting again for internal affairs on April 19th.

24 And I'm happy to answer any questions you
25 have. Thanks.

1 CHAIRMAN FAY: Thank you. Any questions?

2 All right. With that, just one other item, or
3 closing item for the Commission. We would like to
4 welcome some folks from Fortnightly who will be
5 around the building. I'll embarrass them. They're
6 back there to the left. And so if you see them
7 wandering around, please be on your best behavior
8 because they're reporting what we're doing here in
9 the Commission. But, seriously, we're honored to
10 have them and happy to have him here. And I think
11 they left some weather, so they're also happy to be
12 here, too. So grateful to have you here and
13 provide some information for what you do.

14 So with that, Commissioners, unless there's
15 anything else to add, this meeting is adjourned.
16 Thank you.

17 (Proceedings concluded.)

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, DANA W. REEVES, Professional Court
Reporter, do hereby certify that the foregoing
proceeding was heard at the time and place herein
stated.

IT IS FURTHER CERTIFIED that I
stenographically reported the said proceedings; that the
same has been transcribed under my direct supervision;
and that this transcript constitutes a true
transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative,
employee, attorney or counsel of any of the parties, nor
am I a relative or employee of any of the parties'
attorney or counsel connected with the action, nor am I
financially interested in the action.

DATED THIS 11th day of April, 2022.



DANA W. REEVES
NOTARY PUBLIC
COMMISSION #GG970595
EXPIRES MARCH 22, 2024