



May 22, 2024

Electronically Filed

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350

Re: Petition of the North American Numbering Plan Administrator, On Behalf of
the New York Telecommunications Industry, For Relief of the “347/718/917/929”
Numbering Plan Area

Dear Secretary Phillips:

The North American Numbering Plan Administrator (“NANPA”) hereby submits for
filing, a petition on behalf of the New York telecommunications industry for relief of the
“347/718/917/929” Numbering Plan Area (“NPA”) (aka “area code”).

If you have any questions regarding this filing, please contact me at 925-420-0340.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Florence Weber", is written above a horizontal line.

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**BEFORE THE
STATE OF NEW YORK PUBLIC SERVICE COMMISSION**

Petition of the North American)
Numbering Plan Administrator on Behalf)
Of the New York Telecommunications) **Case Number: _____**
Industry for Relief of the)
347/718/917/929 NPA)

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE NEW YORK TELECOMMUNICATIONS INDUSTRY**

Respectfully submitted,



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May 22, 2024

**NEW YORK PUBLIC SERVICE COMMISSION
Albany, New York 12223-1350**

**Petition of the North American)
Numbering Plan Administrator)
on Behalf of the New York) Case No: _____
Industry for Relief of the)
347/718/917/929 Numbering Plan Area)**

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN
ADMINISTRATOR ON BEHALF OF THE NEW YORK
TELECOMMUNICATIONS INDUSTRY**

The North American Numbering Plan Administrator (“NANPA”), as the neutral third-party Numbering Plan Area (“NPA”) (also referred to as “area code”) relief planner for New York and on behalf of the New York telecommunications industry (“Industry”),¹ hereby notifies the New York Public Service Commission (“Commission”)² that the 347/718/917/929 NPA, serving the New York City boroughs of Bronx, Brooklyn, Queens, Staten Island, and the Marble Hill section of Manhattan, is projected to exhaust its central office codes (often referred to as “CO” or “NXX” codes) during the fourth quarter of 2026 and is in need of relief. This means that absent NPA relief, the supply of CO codes in the 347/718/917/929 NPA is projected to run out during the projected exhaust quarter. The Industry reached consensus to request approval for an all-services area code overlay to

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 347/718/917/929 NPA overlay area.

² The Federal Communications Commission (“FCC”) delegated authority to the states to review and approve NPA relief plans. *See* 47 C.F.R. §52.19.

relieve the 347/718/917/929 NPA complex.

The Industry recommends the new additional overlay NPA for the existing 347/718/917/929 NPA be implemented based upon a nine (9)-month schedule. Adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six (6) months prior to the projected exhaust of the 347/718/917/929 NPA.

Prompt approval of the Industry’s plan will also provide the Industry with the necessary time to prepare for the implementation and provide NANPA with the 75 calendar days needed to assign a new NPA, ensure a press release is issued to announce the new NPA, to schedule and facilitate an implementation meeting, and publish the Planning Letter(s).³ The Industry respectfully requests that the Commission promptly approve the Industry’s plan and issue its final decision to implement the overlay as set forth herein, no later than March 31, 2025.

I. Background

The 212 NPA was one of the original area codes established in 1947 to serve all five (5) boroughs of New York City. The 718 NPA was created by an area code split from the 212 NPA in 1984. In 1992, the 917 NPA was introduced as the first overlay area code in the country, which overlaid both the 718 and 212 NPAs. The 347 NPA was approved to overlay the 718/917 NPAs in 1999, and in 2011 the 929 NPA was approved to overlay the 347/718/917 NPAs.

The 347/718/917/929 NPA overlay complex serves the boroughs of the Bronx, Brooklyn, Queens, and Staten Island, as well as the Marble Hill section of Manhattan. There are a total of 13 rate centers (also referred to as “exchanges”) in the 347/718/917/929 NPA.

³ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, December 4, 2023) at §5.10.1 (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines can be accessed on the ATIS website located at <https://access.atis.org/higherlogic/ws/public/documents?view=>.

II. Description of Relief Alternatives

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. In April 2024, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2024 NRUF Report”) which indicated that the 347/718/917/929 NPA would exhaust during the fourth quarter of 2026.⁴

NANPA determined there were two possible overlay alternatives for relief of the 347/718/917/929 NPA: 1) an all-services distributed overlay with the addition of a new NPA; and 2) a boundary elimination overlay with the addition of a new NPA. NANPA distributed an Initial Planning Document (“IPD”)⁵ containing the two NPA relief alternatives to the Industry along with the meeting notice on March 13, 2024.⁶ NANPA convened an Industry NPA relief planning meeting via web conference on April 11, 2024, to review the following two relief alternatives included in the IPD:

- **Alternative #1: An all-services distributed overlay of the 347/718/917/929 NPA with a new overlay NPA.**

A new overlay NPA code would be assigned to the same geographic area occupied by the existing 347/718/917/929 NPA. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the

⁴ The April 2024 NRUF and NPA Exhaust Forecast Analysis (“April 2024 NRUF Report”) can be accessed on the NANPA web site at https://www.nationalnanpa.com/reports/reports_npa.html.

⁵ A copy of the IPD is included in Exhibit A.

⁶ NANPA’s March 13, 2024, notice to the Industry is also included in Exhibit A with the IPD, as well as CO code assignment information, thousands-block pooling statistics, and maps of the overlay alternatives.

347/718/917/929 NPA have been allocated. Customers would retain their current telephone numbers and the current 1+10-digit local dialing pattern will be required by all customers within and between the NPAs in the affected area.

The projected life for Alternative #1, based on current demand, is 11 years.

- **Alternative #2: A boundary elimination overlay of the 347/718/917/929 and 212/332/646/917 NPAs with the addition of a new overlay NPA.**

The boundary between the existing 347/718/917/929 and 212/332/646/917 NPAs would be eliminated. The 347/718/917/929 and 212/332/646/917 NPAs would be assigned to the same geographic areas occupied by the existing 347/718/917/929 and 212/332/646/917 NPAs, so that all seven (7) NPAs plus the new overlay NPA would serve the same larger geographic area. The 347/718/917/929 NPA and 212/332/646/917 NPA customers would retain their current telephone numbers. Local dialing for all calls by all customers within these NPAs would continue to require 1+10-digits. Available CO codes in the 347/718/917/929 NPA will be assigned upon request in the 212/332/646/917 NPA area with the effective date of the boundary elimination and available 212/332/646/917 NPA CO codes will be assigned upon request in the former 347/718/917/929 NPA area. Simultaneous with the boundary elimination, a new overlay NPA would be assigned to the entire seven (7) NPA geographic area, creating an eight (8) NPA overlay. Upon exhaust of the 212/332/347/646/718/917/929 NPAs, all future CO code assignments will be made from the new overlay NPA. This relief alternative unites the five (5) boroughs and the two geographic areas overlaid by the 917 NPA into one overlay area. The 212/332/646/917 NPA has one (1) rate center, and the projected exhaust is first

quarter of 2049⁷.

The projected life for Alternative #2 achieved by the boundary elimination and adding a new overlay NPA, based on current demand, is 14 years.

III. Description of the Recommended Relief Alternative

At the relief planning meeting, the Industry participants discussed the attributes of both relief alternatives and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay of the 347/718/917/929 NPA, as the preferred form of relief. The additional all-services distributed overlay would add a new NPA over the same geographic area covered by the existing 347/718/917/929 NPA and is projected to last approximately 11 years. NANPA will assign CO codes from the new overlay NPA once all available CO codes from the 347/718/917/929 NPA are assigned. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers.

The Industry recommends the all-services distributed overlay alternative because:

- It impacts fewer customers,
- It is easier for service providers to implement from a translations, billing, and operational support system perspective,
- The customer confusion and additional work required for the boundary elimination overlay alternative exceeds the benefit of the additional three (3) years of life the boundary elimination overlay provides.

The Industry also established, by consensus, a relief implementation schedule which includes flexible timeframes so that the Industry can accommodate certain holidays, high network traffic days, network freeze periods, and implementation dates for other NPA relief

⁷ The exhaust projection of the 212/332/646/917 NPA moved in from first quarter 2050 to first quarter 2049, with the release of the April 2024 NRUF Report.

implementation activities occurring in other parts of the country. The Industry recommends that it implement the new overlay NPA based upon a nine (9)-month schedule. Adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six (6) months prior to the projected exhaust of the 347/718/917/929 NPA.⁸

The current dialing plan for the 347/718/917/929 all-services distributed overlay is set forth in the following table. The Industry-recommended dialing plan for the all-services distributed overlay requires no change to the existing dialing plan because this area is already a multiple NPA overlay.

DIALING PLAN
Dialing Plan for the 347/718/917/929 All-Services Distributed Overlay

TYPE OF CALL	CALL TERMINATING IN	DIALING PLAN
Local & Toll	Overlay NPAs (Within and between 347/718/917/929 and new NPA)	1+10 digits (NPA-NXX-XXXX) *
Local & Toll	Foreign NPA (FNPA) outside of overlay NPAs	1+10 digits (1+ NPA-NXX-XXXX)
Operator Services, Credit card, collect, third party	Home NPA (HNPA) or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*10-digit local dialing permissible at carrier discretion

The Industry reached consensus to implement the new relief NPA in accordance with a nine (9)-month schedule⁹ as set forth in the following table:

⁸ NPA Relief Planning Guidelines at §7.2.

⁹ The NPA Relief Planning Guidelines at §5.1 require that relief be implemented six (6) months prior to exhaust.

**Implementation Timeframe Schedule
for the 347/718/917/929 All-Services Distributed Overlay**

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	Implementation start date selected by the Industry
Customer Education and Network Preparation Period Ends	Nine (9)-months after the implementation start date selected by the Industry
Earliest Activation of CO codes in the new NPA *	Nine (9)-months after the implementation start date selected by the Industry

* CO codes in the new NPA will not be assigned until all available CO codes in the existing 347/718/917/929 NPA are allocated.

The Commission’s prompt approval of the instant Petition and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers’ customers due to the unavailability of CO codes.

In addition to the Industry-recommended timeframes, NANPA should be provided approximately 75 calendar days from the date of the order (or other written approval) to assign a new NPA, ensure a press release is issued to announce the new NPA, to schedule and facilitate an implementation meeting with the Industry, and publish the Planning Letter(s).

The following tables outline the Customer Education and Technical milestones the Industry typically utilizes for implementation of an additional NPA overlay, when mandatory 1+10-digit local dialing is already in place.¹⁰

Customer Education Milestones

	ACTION	RESPONSIBILITY
1.	Issue single customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers

¹⁰ The Customer Education and Technical milestones outlined herein may be modified by agreement of the Industry members if required during the actual implementation meetings.

	ACTION	RESPONSIBILITY
2.	Issue initial press release announcing the additional overlay NPA.	Commission; Service Providers to the extent they are able to do so
3.	Send Special Letters to Directory Publishers	Co-chairs of Industry committee
4.	Update social media with information regarding additional overlay NPA.	All Service Providers (optional) and NANPA
5.	Update websites with information regarding the additional overlay NPA.	All Service Providers
6.	Develop language for use in Directories to alert the consumers of the additional overlay NPA.	Directory Publishers
7.	Issue second press release just prior to the additional NPA effective date	Commission; Service Providers to the extent they are able to do so

Technical Milestones

	ACTION	RESPONSIBILITY
1.	Obtain industry test code from NANPA and activate the test number	One Service Provider Volunteer
2.	Open the test code in carriers' network	All Service Providers
3.	Establish NPA Specific type of Trunks	All Service Providers (as needed)
	<u>E911 Work Plan</u>	
4.	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
5.	Ensure SRDB table has new NPA built	E911 Providers
6.	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
7.	Notify Statewide 911 Coordinator	Industry Co-chairs
8.	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
9.	Update PSAP equipment to recognize new NPA	PSAP's
10.	Trunk Orders Complete	E911 Providers
11.	Build E911 Network/Tandem Translations	E911 Providers
12.	Verify if all PSAP work has been completed	E911 Providers
13.	Activate E911 Network/Tandem Translations	All Service Providers

IV. Conclusion

The Industry requests that the Commission issue an order in response to the

instant Petition approving the all-services distributed overlay relief plan for the 347/718/917/929 NPA and the recommended implementation schedule without a hearing. To the extent possible, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this petition, the Industry will implement a new all-services distributed overlay NPA over the 347/718/917/929 NPA in accordance with the implementation schedule set forth above. As such, the Industry requests that the Commission grant this petition no later than March 31, 2025.

Respectfully submitted,



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May 22, 2024

EXHIBIT A



March 13, 2024

To: All 347/718/917/929 NPA Code Holders and Interested Industry Members (New York)

Subject: New York 347/718/917/929 NPA Initial Planning Document Review Meeting

The North American Numbering Plan Administrator (“NANPA”) is responsible for initiating area code relief in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented in accordance with the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, “Guidelines”). The October 2023 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2023 NRUF Report”), published by NANPA, indicated that the 347/718/917/929 NPA overlay complex would exhaust during the first quarter of 2027. Per the Guidelines, NPA relief planning is to begin 36-months prior to exhaust of the NPA or by the first quarter of 2024.

Accordingly, on April 11, 2024, NANPA will convene an industry NPA relief planning meeting via web conference to review the initial planning document (“IPD”) and develop a recommended relief plan for the 347/718/917/929 NPA. The objective of this meeting is to reach consensus among members of the New York Telecommunications Industry (“Industry”) on a single relief plan for the 347/718/917/929 NPA. The resulting relief plan will be filed in a petition with the State of New York Public Service Commission (“Commission”) for their consideration and approval. The industry-recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (“ATIS”) will be applied in the decision-making efforts.

Included with this meeting notice is the meeting agenda, consensus process, 347/718/917/929 NPA CO code and thousands-block status reports, relief planning meeting aids, service provider CO code assignments by OCN, rate centers in the 347/718/917/929 NPA, and associated maps. Because there is a relief alternative outlined in this notice that includes the 212/332/646/917 NPA, the thousands-block statistics, CO code summaries, Service Provider CO code assignments by OCN, and rate center data are also included for these NPAs.

At this meeting, please be prepared to discuss the following CO codes: 917-352, 917-394 and 917-955 that are in NAS as unassignable. These CO codes need to be investigated for possible release as assignable CO codes.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on April 11, 2024. This may be the only Industry meeting before a decision is reached on a recommended relief plan that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Thursday, April 11, 2024

Time: 2:00 pm, ET; 1:00 pm CT; 12:00 pm MT; 11:00 am PT

Join Zoom Meeting

<https://somos.zoom.us/j/85086835012?pwd=y8IJk62CibDIArfiaLoRZjKWFViQDG.1&from=adon>

Meeting ID: 850 8683 5012

Password: 403548

One tap mobile

8778535257,,85086835012# US Toll-free

8884754499,,85086835012# US Toll-free

Dial by your location

877 853 5257 US Toll-free

888 475 4499 US Toll-free

Meeting ID: 850 8683 5012

If you receive this notice from someone else and would like to receive additional information in the future about the 347/718/917/929 NPA relief project, please sign up for NANPA's NAS-NNS by going to www.nationalnanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please contact me at (925) 420-0130 or via email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe

NPA Relief Planner

NANPA

cc: Lauriann Mullen – New York Department of Public Service

Paul Esmond – New York Department of Public Service

Paul Chromik – New York Department of Public Service

**NEW YORK 347/718/917/929 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE**

April 11, 2024 - 2:00 PM (ET)

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review NPA Background and History

Review NPA Status

Discuss 917-352, 917-394 and 917-955 NXXs for Potential Release

Review Initial Planning Document and Proposed Alternatives

Review Relief Alternative Pros and Cons

Consensus on Relief Alternative

Consensus on Implementation Intervals

Consensus on Customer Education and Technical Milestones

Consensus on Approval & Filing

Statements for the Record

Posting of Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

NOVEMBER /16/2020

ATIS OPERATING PROCEDURES

VERSION 5.6

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

5 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, expansion of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.
- e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.
- f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit local dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹
- g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the premise that all NXXs available for

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

5.1 Determine the Expected NPA Exhaust Period

Through the use of historical growth data as well as expected changes (e.g., expansion of thousands-block pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results, should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six (6) months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six (6) months prior to the earliest likely exhaust date.

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA will distribute the Initial Planning Document to the industry within four (4) weeks of the declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more than eight (8) weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is an artificial exhaust projection based on the monthly rationing amount determined by the industry and not reflective of the true need for relief.
- In cases where the NPA is in jeopardy and CO codes are rationed, two exhaust dates will be reported: (1) the exhaust date at jeopardy declaration, and (2) the exhaust date with controlled allocation.

5.2 Identify the Alternative Relief Methods Available

Within the affected NPA, the NANPA should next identify possible NPA relief alternatives and methods from among those identified in Section 6.

5.3 Define the Attributes of Each Alternative or Method

For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers, and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, and local dialing plans using 7-digits or 10-digits should be made at this point. Examples of attributes are shown in Appendix E.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning

The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to Industry members of future meeting schedules to be held for the

purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The IPD should be provided at least four (4) weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.

5.5 Conduct Industry Meetings/Conference Calls with the Goal of Reaching Industry Consensus on a Relief Plan

Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration³. NANPA shall moderate these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry consensus, subsequent meetings/conference calls shall be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

6 Alternative Relief Methods

All of the currently identified code relief alternatives are described below, but depending on the particular NPA and the distribution of assigned NXXs within it, some alternatives may not be compliant with the criteria in Section 5.0 above (e.g., in an NPA with a high concentration of assigned NXXs in one or only a few rate centers, the overlay may be the only possible relief method). Possible impacts of these alternatives are found in Appendices B, E and G.

6.1 NPA Split Method

By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. 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. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA.

6.2 Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift/realignment occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change, and number changes are mandatory for customers assigned numbers from NXX codes that are moved to the adjacent

³ Caveat: those on the bridge may NOT ask for comments to be repeated or for additional explanations to be given because they cannot see what's happening in the room. The use of a bridge must not slow down the meeting.

NPA. This method applies to multi-NPA states or provinces only. Boundary realignments must follow rate center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Distributed Overlay Method⁴

An all-services distributed overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs.⁵ Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the SP's discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a permissive dialing period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs. They are listed below:

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be considered where the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new NXXs in that section would be assigned from the new NPA. As the NXXs allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available NXXs to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit local dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA. A concentrated growth overlay may cause customer dialing confusion and additional technical work for some SPs, and may require a longer implementation interval.

6.3.2 Boundary Elimination Overlay

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and available NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs, and may require a longer implementation interval.

⁴ The LNPA Working Group Best Practice 30 supports the all-services distributed overlay as the preferred form of area code relief, and was endorsed by the North American Numbering Council (NANC) on September 18, 2013. See <http://www.nanc-chair.org/docs/documents.html>.

⁵ 47 CFR §52.19 (c) (3) (ii).

6.3.3 Multiple Overlay

The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists. Multiple overlays may require additional technical work for some SPs, and may require a longer implementation interval.

6.3.4 Technology-Specific or Service-Specific Overlay

These overlays occur when a new area code is introduced to serve the same geographic area as one or more existing area code(s) and numbering resources in the new area code overlay are assigned to a specific technology(ies) or service(s). State commissions may not implement a technology-specific or service-specific overlay without express authority from the FCC.⁶ Such overlays are not feasible where local number portability and/or thousands-block pooling have been implemented. For purposes of relief planning, a technology-specific or service-specific overlay shall not be considered by the NANPA or the industry.

A state commission seeking delegated authority from the FCC to implement a technology-specific or service-specific overlay should discuss why the numbering resource optimization benefits of the proposed overlay would be superior to implementation of an all-services distributed overlay.⁷

6.4 Other Relief Methods

A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlays, as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations, projected exhaust, and community needs and requirements.

7 Other Relief Planning Considerations

This section describes miscellaneous considerations that should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Regulatory Involvement

Regulatory Involvement - Involvement of the appropriate regulatory authority staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

⁶ 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶¶67-94.

⁷ See FCC 01-362 ¶ 81-94.

7.2 Timing and Schedules

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

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Annex B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- quantity of subscribers who will have to undergo number changes
- impact on customer premise equipment (CPE), e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- public reaction to and political involvement in boundary decisions
- impact on market identity/recognition, geographic identity, public familiarity
- public costs such as reprinting of stationery, business cards, advertising, and CPE and other database reprogramming.

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks
- LNP compliance impacts

Industry Concerns

-
- length of relief period
 - NPA code utilization
 - Number Pooling impact on length of relief period (where applicable)
-

Annex E

General Attributes of the Most Common Relief Alternatives

Geographic Splits	All-Services Overlays
<ul style="list-style-type: none"> • Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area. 	<ul style="list-style-type: none"> • With an overlay there will be more than one area code in a geographic area.
<ul style="list-style-type: none"> • Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split. 	<ul style="list-style-type: none"> • An overlay will not require existing customers to change their area code.
<ul style="list-style-type: none"> • Geographic splits permit 7-digit dialing within an area code. 	<ul style="list-style-type: none"> • An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
<ul style="list-style-type: none"> • Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code. 	<ul style="list-style-type: none"> • There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.
<ul style="list-style-type: none"> • Future splits will reduce the geographic size of the area code. 	<ul style="list-style-type: none"> • An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

<h2 style="margin: 0;">Relief Planning Meeting Aid</h2> <h3 style="margin: 0;">Pros and Cons for Relief Alternatives</h3>

This meeting aid is a compilation of industry developed pros and cons from NPA relief planning meetings and is prepared to assist the participants in evaluating the attributes of the relief alternatives being considered.

Overlay Pros and Cons:

Pros:

Alternative #	
1	All existing customers would retain the 347/718/917/929 area code and would not have to change their telephone number.
2	Does not discriminate against customers on different sides of a boundary line as does a geographic split.
3	Less customer confusion and easier education process.
4	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
6	No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split.
7	Minimizes call routing issues, especially with ported numbers.
8	Easier for service providers to implement from a translations, billing and service order system perspective.
9	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table.
10	The Commission would not have to decide which side retains the X NPA as would be required for an NPA split.
11	Does not split cities, counties or communities of interest into different area codes.
12	Does not impact some wireless carriers that have to reprogram handsets manually as would be required for an NPA split.
13	No technical impacts to number portability, text messaging or multimedia messaging.
14	An all-services distributed overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice as would be required for a split.
15	Helps move customers toward nationwide 10-digit dialing.
16	Transitioning to 10-digit local dialing will enable central office codes protected for 7-digit routes to be released for assignment.

Relief Planning Meeting Aid
Pros and Cons for Relief Alternatives

Overlay Pros and Cons:

Cons:

Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 347/718/917/929 NPA and the new overlay NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.).
					4 Loss of geographic identity with an overlay if assigned a telephone number in the new overlay NPA.
					5 Confusion due to differences in state dialing requirements between local and toll calling; customers dialing 10 digit vs 1+10-digit for local calls.

Boundary Elimination Overlay Pros and Cons:

Pros:

Alternative #					
					1 Eliminates need to open new NPA
					2 Does not require customers to change their area code.
					3 It is a more efficient use of resources.
					4 Boundary elimination alternative with a new NPA has a longer life than the all-services overlay
					5 Reunites the five New York Boroughs
					6 Combines the two geographic areas overlaid by the 917 NPA

Boundary Elimination Overlay Pros and Cons:

Cons:

Alternative #					
					1 Boundary elimination alternatives have shorter lives than the all-services overlay

<h2>Relief Planning Meeting Aid</h2> <h3>Pros and Cons for Relief Alternatives</h3>				
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					2	Impacts a larger quantity of customers than the all-services overlay
					3	Requires customers in the X NPA to dial 10 digits where otherwise they wouldn't be subjected to NPA Relief for another X years.
					4	Complex customer education process, which would likely lead to increased customer confusion.



Relief Planning Meeting Aid

Dialing Plans and Implementation Intervals

This meeting aid has examples of industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

NY 347/718/917/929 NPA

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	1+10 digits (1+NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*10-digit local dialing permissible

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within existing NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA) *</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

*CO codes in the new NPA will not be assigned until all available codes in the Existing NPA have been exhausted.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	8 Months
Earliest Activation of CO Codes in the new NPA*	1 Month after the completion of customer education and network preparation period No later than (insert QTR)

*CO codes in the new NPA will not be assigned until all available codes in the Existing NPA have been exhausted.



Relief Planning Meeting Aid

Dialing Plans and Implementation Intervals

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period Ends	9 months after the Implementation Start Date selected by the Industry
Earliest Activation of CO Codes in the new NPA*	9 months after the Implementation Start Date selected by the Industry No later than (insert QTR)

**CO codes in the new NPA will not be assigned until all available codes in the existing NPA have been exhausted.*

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period (<i>Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable</i>) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation (<i>Effective date for codes from the new NPA</i>)	End of Recording Period
Total Implementation Interval	15 months

Relief Planning Meeting Aid

Customer Education and Technical Milestones

This meeting aid is a compilation of industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

Customer Education Milestones:

			Responsibility
		1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding new overlay NPA.	
		5 Update websites with information regarding new overlay NPA	
		6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	
		<u>After Permissive 7 and 10-Digit Dialing Begins</u>	
		7 Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	
		9 Update social media with information regarding new overlay NPA.	
		10 Update websites with information regarding new overlay NPA	
		11 Issue second mandatory press release just prior to the new overlay NPA's effective date	

Relief Planning Meeting Aid

Customer Education and Technical Milestones

Technical Milestones:

			Responsibility
		1 Obtain industry test code from NANPA and activate the test number	
		2 Open the test code in carriers' network	
		3 LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc	
		4 Ensure Highway boxes are programmed with 10-digit dialing	
		5 Network ready for Permissive Dialing	
		6 Create Permissive Dialing Industry Contact List	
		<u>Permissive Dialing Begins</u>	
		7 Establish NPA Specific type of Trunks	
		8 Completion of 10-digit signaling transition between carriers' networks	
		9 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	
		10 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
		11 Recorded announcements in Place and Tested	
		<u>E911 Work Plan</u>	
		12 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	
		13 Ensure SRDB table has new NPA built	
		14 Notify PSAPs, PSALI customers and County Coordinators	
		15 Review and Submit CLEC Trunk Order Requests to local provider if needed	
		16 Update PSAP equipment to recognize new NPA	

Relief Planning Meeting Aid

Customer Education and Technical Milestones

		17 Trunk Orders Complete	
		18 Build E911 Network/Tandem Translations	
		19 Verify if all PSAP work has been completed	
		20 Activate E911 Network/Tandem Translations	

The above are the typical milestones necessary for implementation of a {relief type}; however, these may need to be modified during the actual implementation.

347/718/917/929 NPA RATE CENTER TABLE

NPA Complex	Abbreviated Rate Center	Rate Center Full Name
347/718/917/929	NWYRCYZN03	NEW YORK CITY ZONE 3
347/718/917/929	NWYRCYZN04	NEW YORK CITY ZONE 4
347/718/917/929	NWYRCYZN05	NEW YORK CITY ZONE 5
347/718/917/929	NWYRCYZN06	NEW YORK CITY ZONE 6
347/718/917/929	NWYRCYZN07	NEW YORK CITY ZONE 7
347/718/917/929	NWYRCYZN08	NEW YORK CITY ZONE 8
347/718/917/929	NWYRCYZN09	NEW YORK CITY ZONE 9
347/718/917/929	NWYRCYZN10	NEW YORK CITY ZONE 10
347/718/917/929	NWYRCYZN11	NEW YORK CITY ZONE 11
347/718/917/929	NWYRCYZN12	NEW YORK CITY ZONE 12
347/718/917/929	NWYRCYZN13	NEW YORK CITY ZONE 13
347/718/917/929	NWYRCYZN14	NEW YORK CITY ZONE 14
347/718/917/929	NWYRCYZN15	NEW YORK CITY ZONE 15

212/332/646/917 NPA RATE CENTER TABLE

NPA Complex	Abbreviated Rate Center	Rate Center Full Name
212/332/646/917	NWYRCYZN01	NEW YORK CITY ZONE 1

NY 347/718/917/929 NPA Code Holder List

Company	OCN
ADVANTAGE COMMUNICATIONS	6801
AMERICAN NETWORK, INC.	8667
AQUIS COMMUNICATIONS	6919
AT&T - LOCAL	7421
BALTIMORE-WASHINGTON TELEPHONE COMPANY - NY	782G
BANDWIDTH.COM CLEC, LLC - NY	997E
BARR TELL USA, INC. - NY	525G
BROADVIEW NETWORKS, INC. - NY	4593
CABLEVISION LIGHTPATH, INC. - NY	7126
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - NY	6959
COMMIO, LLC	939H
CONVERSENT COMMUNICATIONS OF NEW YORK, LLC - NY	3724
CORE COMMUNICATIONS, INC.- MD	2593
CSC WIRELESS, LLC	425J
DIAL-A-BEEPER	6871
EON TELECOM, INC.	839J
EUREKA TELECOM, INC. DBA EUREKA NETWORKS - NY	1376
FRACTEL, LLC	965H
GLOBAL CROSSING LOCAL SERVICES, INC. - NY	7343
INTRADO COMMUNICATIONS, LLC	831C
K.T.W. INTERNATIONAL CORP.	6877
LEVEL 3 COMMUNICATIONS, LLC - NY	4006
LEVEL 3 TELECOM OF NEW YORK, LP - NY	8473
LTE WIRELESS INC D/B/A LTE WIRELESS - NY	452J
MATRIX TELECOM, INC DBA TRINSIC COMMUNICATIONS- NY	4830
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - NY	7133
METROPCS, INC.	5562
METROPOLITAN TELECOMMUNICATIONS - NY	8526
NEW CINGULAR WIRELESS PCS, LLC - DC	4036
NUSO, LLC	551G
NUSO, LLC	732J
OMNIPOINT COMMUNICATIONS, INC. - NY	6622
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC- NY	384C
PAETEC COMMUNICATIONS, INC. - NY	4152
PEERLESS NETWORK OF NEW YORK, LLC - NY	155E
RCN TELECOM SERVICES, INC. - NY	7353
REGIONAL TELEPHONE CORPORATION - NY	558C
SAVECOM TELECOM - NY	913H
SCARSDALE SECURITY SYSTEMS	2612

NY 347/718/917/929 NPA Code Holder List

TC SYSTEMS, INC. - NY	7140
TELENGY L.L.C. - NY	473G
TELNYX LLC	073H
TIME WARNER CABLE INFO SVCE (NEW YORK) LLC-NY	532D
TON80 COMMUNICATIONS, LLC	516J
TRINITY INTERNATIONAL	6800
TWILIO INTERNATIONAL, INC.	506J
USA MOBILITY WIRELESS	6630
US LEC COMMUNICATIONS, INC. - NY	3746
VERIZON NEW YORK, INC.	9104
VOIP INNOVATIONS, LLC	597F
VONAGE AMERICA LLC	197D
WHITESKY COMMUNICATIONS, LLC	553J
WORLDCALL INTERCONNECT INC.	139F
XCHANGE TELECOM CORP. - NY	325B
XO NEW YORK, INC.	8340
YMAX COMMUNICATIONS CORP. - NY	282E
ZCALL.COM	0059

Block holders with No CO Codes Assigned

Company	OCN
CENTURYLINK COMMUNICATIONS, LLC	508J
CORETEL NEW YORK, INC. - NY	1215
CTC COMMUNICATIONS CORP. - NY	3864
DISH WIRELESS, LLC	490J
HD CARRIER LLC	321J
IP HORIZON LLC	515J
PEERING HUB, INC. - NY	818H
RCLEC, INC.	156J
RINGSQUARED TELECOM LLC	892E
TELXMEDIA, INC. - NY	744H
TERRA NOVA TELECOM INC.	145J
UCOMTEL INC.	534J
VITCOM LLC - NY	219E
WARWICK VALLEY TELEPHONE COMPANY	4967
WIDE VOICE, LLC - NY	705G

NY 212/332/646/917 NPA Code Holder List

Company	OCN
ADVANCED TELECOM SOLUTIONS, LLC	181J
AIRESPRING, INC. - CA	200B
AIRUS, INC. - NY	363H
AMERICAN MESSAGING SERVICES	9748
AMERICAN NETWORK, INC.	8667
AT&T - LOCAL	7421
BANDWIDTH.COM CLEC, LLC - NY	997E
BARR TELL USA, INC. - NY	525G
BROADVIEW NETWORKS, INC. - NY	4593
BUSINESS AUTOMATION TECHNOLOGIES, INC. - NY	474F
CABLEVISION LIGHTPATH, INC. - NY	7126
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - NY	6959
CENTURYLINK COMMUNICATIONS, LLC	508J
COMMIO, LLC	939H
CONVERSENT COMMUNICATIONS OF NEW YORK, LLC - NY	3724
CORETEL NEW YORK, INC. - NY	1215
CSC WIRELESS, LLC	425J
CTC COMMUNICATIONS CORP. - NY	3864
EDGETEL, LLC	179J
EUREKA TELECOM, INC. DBA EUREKA NETWORKS - NY	1376
EXIANT COMMUNICATIONS LLC	114J
FIVE9, INC.	598J
FRACTEL, LLC	965H
GC PIVOTAL, LLC - NY	3751
GLOBAL CROSSING LOCAL SERVICES, INC. - NY	7343
HADLO TECHNOLOGIES, LLC	436J
INTRADO COMMUNICATIONS, LLC	831C
IP HORIZON LLC	515J
LEAP TELECOM, LLC	616J
LEVEL 3 COMMUNICATIONS, LLC - NY	4006
LEVEL 3 TELECOM OF NEW YORK, LP - NY	8473
LTE WIRELESS INC D/B/A LTE WIRELESS - NY	452J
MATRIX TELECOM, LLC. S/I/I TNCI - NY	942B
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - NY	7133
METROPCS, INC.	5562
METROPOLITAN TELECOMMUNICATIONS - NY	8526
MIX NETWORKS, INC.	856H
MOSAIC NETWORKX LLC - NY	278G
NEW CINGULAR WIRELESS PCS, LLC - DC	4036

NY 212/332/646/917 NPA Code Holder List

NUSO, LLC	478J
NUSO, LLC	551G
OMNIPOINT COMMUNICATIONS, INC. - NY	6622
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC- NY	384C
PAETEC COMMUNICATIONS, INC. - NY	4152
PEERING HUB, INC. - NY	818H
PEERLESS NETWORK OF NEW YORK, LLC - NY	155E
RADIANTIQ LLC	566J
RCLEC, INC.	156J
RCN TELECOM SERVICES, INC. - NY	7353
REGIONAL TELEPHONE CORPORATION - NY	558C
RINGSQUARED TELECOM LLC	892E
SHELCOMM	0051
SKYE TELECOM LLC DBA SKYETEL	622J
SPRINT SPECTRUM, L.P.	6664
STRATUS NETWORKS	495J
TC SYSTEMS, INC. - NY	7140
TELENGY L.L.C. - NY	473G
TELXMEDIA, INC. - NY	744H
TERRA NOVA TELECOM INC.	145J
TIME WARNER CABLE INFO SVCE (NEW YORK) LLC-NY	532D
TON80 COMMUNICATIONS, LLC	516J
TRINITY INTERNATIONAL	6800
TWILIO INTERNATIONAL, INC.	506J
UCOMTEL INC.	534J
USA MOBILITY WIRELESS	6630
US LEC COMMUNICATIONS, INC. - NY	3746
VERIZON NEW YORK, INC.	9104
VITCOM LLC - NY	219E
VOIP INNOVATIONS	597F
VONAGE AMERICA LLC	197D
WAVENATION, LLC	700J
WHITESKY COMMUNICATIONS, LLC	553J
WIDE VOICE, LLC - NY	705G
WIPHONICA TECHNOLOGIES, INC. - NY	828F
XCHANGE TELECOM CORP. - NY	325B
XO NEW YORK, INC.	8340
YMAX COMMUNICATIONS CORP. - NY	282E

NY 212/332/646/917 NPA Code Holder List

Block holders with No CO Codes Assigned

Company	OCN
TELNYX LLC	073H
DISH WIRELESS, LLC	490J

Central Office Code Summary

<u>NPA</u>	<u>347</u>	<u>718</u>	<u>929</u>	<u>212</u>	<u>332</u>	<u>646</u>	<u>917</u>			
Assigned NXXs	783	779	599	784	121	781	777			
Reserved NXXs	0	0	0	0	0	0	0			
Unavailable NXXs	17	21	14	16	14	19	19		See Note	
Available NXXs	0	0	187	0	665	0	4			
Total	800	800	800	800	800	800	800			
<u>Codes Assignment History</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>				
347 NPA	3	0	2	10	2	2*				
718 NPA	3	0	2	6	5	0*				
929 NPA	38	45	59	57	61	14*				
212 NPA	1	0	0	7	2	0*				
332 NPA	19	24	24	19	14	1*				
646 NPA	8	0	0	6	8	0*				
917 NPA	6	0	4	14	8	2*				
*As of March 12, 2024										
Exhaust:	Based on the October 2023 NRUF, the 347/718/917/929 NPA is projected to exhaust in 1Q2027 and the 212/332/646/917 is projected to exhaust in 1Q2050.									
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).										

THOUSANDS-BLOCK STATISTICS

ST/NPA:	NY 347/718/917/929	NY 212/332/646/917
MEETING DATE:	4/11/2024	4/11/2024
RATE CENTERS		
<i># Total</i>	13	1
<i># Mandatory</i>	13	1
<i># Mandatory-Single Service Providers (M*)</i>	0	0
<i># Optional</i>	0	0
<i># Excluded</i>	0	0
BLOCKS ASSIGNED		
<i># Total</i>	883	253
<i>(For time period 4/01/23 - 3/12/24)</i>		
BLOCKS AVAILABLE		
<i>#Total</i>	77	171
<i>(As of preparation date: 3/12/24)</i>		
CODES ASSIGNED		
<i># Total</i>	75	29
<i># for Pool Replenishment</i>	74	27
<i># for Dedicated Customers</i>	0	1
<i># for LRNs</i>	1	1
<i>(For time period 4/01/23 - 3/12/24)</i>		
CODES FORECASTED		
<i># Total</i>	77	2
<i># for Pool Replenishment and Dedicated Customers</i>	77	0
<i># for LRNs</i>	0	2
<i>(For the next twelve months as of: 3/12/24)</i>		

Initial Planning Document

for

Relief of New York 347/718/917/929 NPA

April 11, 2024

North American Numbering Plan Administrator

Cecilia McCabe
NPA Relief Planner

347/718/917/929 NPA Background Information

Relief Planning Background and Assumptions:

The 212 NPA was created in 1947 as one of New York’s original area codes and served all five boroughs of New York City. The 718 NPA was created by a geographic split of the 212 NPA in 1984. The 917 NPA was implemented in 1992 as the first overlay in the U.S. which overlaid both the 718 and 212 NPAs. The 347 NPA was added to the 718/917 NPA overlay in 1999 and in 2011, the 929 NPA was added to the 347/718/917 NPA overlay.

The 347/718/917/929 NPA overlay complex serves the boroughs of the Bronx, Brooklyn, Queens, Staten Island as well as the Marble Hill section of Manhattan.

Exhaust Forecast:

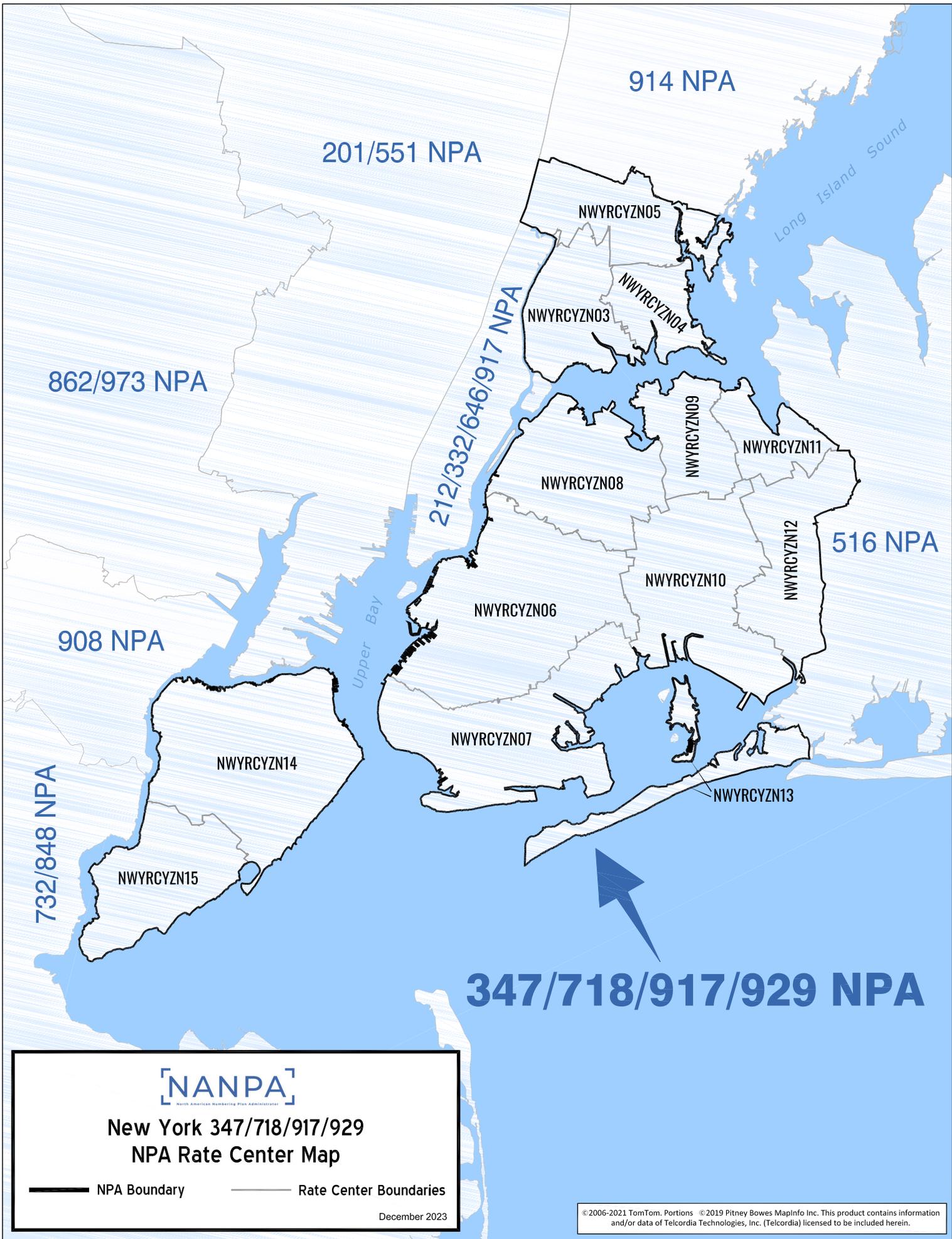
The October 2023 Numbering Resource Utilization/Forecast (“NRUF”) and NPA Exhaust Analysis (“October 2023 NRUF Report”), published by NANPA, indicates that the 347/718/917/929 NPA will exhaust during the first quarter of 2027.

The October 2023 NRUF Report also indicates that the 212/332/646/917 NPA will exhaust during the first quarter of 2050. These NPAs are included in possible alternatives for relief contained in this Initial Planning Document (“IPD”).

CURRENT DIALING PLANS OF THE 347/718/917/929 and 212/332/646/917 NPAs

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA)	1+10 digits (1+NPA-NXX-XXXX)*
	Foreign NPA (FNPA)	1+10 digits (1+NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*10-digit local dialing permissible



NEW YORK 347/718/917/929 NUMBERING PLAN AREA (NPA) RELIEF ALTERNATIVES

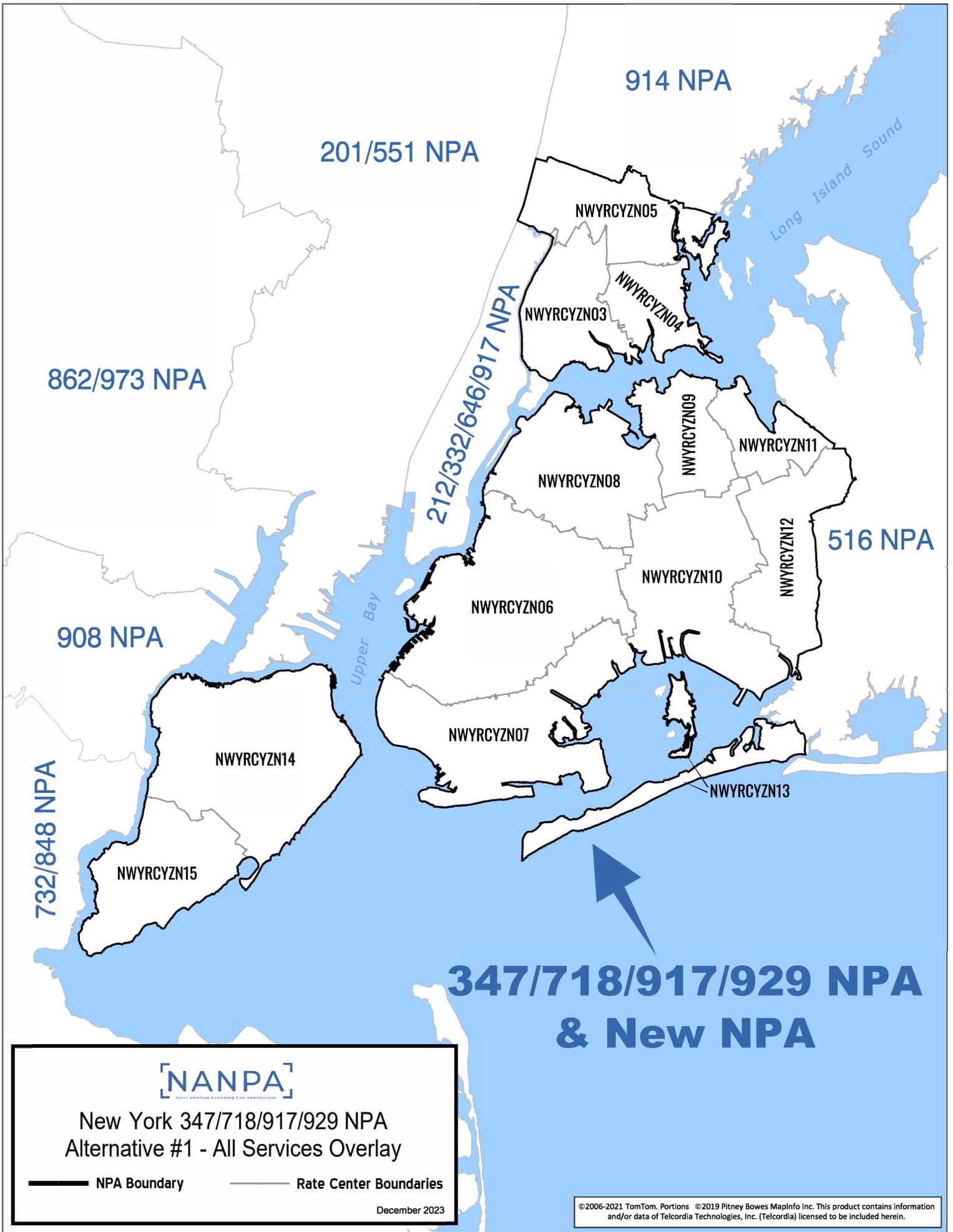
ALTERNATIVE DESCRIPTIONS

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 347/718/917/929 NPA overlay. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 347/718/917/929 NPA have been allocated. Customers would retain their current telephone numbers, and 1+10-digit local dialing would be required within and between the 347/718/917/929 and the new overlay NPA. There are 13 rate centers in the 347/718/917/929 NPA and at the current assignment rate, the projected life of this alternative would be 11 years.

ALTERNATIVE #2 – NPA BOUNDARY ELIMINATION OVERLAY AND NEW NPA

The boundary between the existing 347/718/917/929 and 212/332/646/917 NPAs would be eliminated and a new NPA would be assigned to the same geographic areas occupied by the existing 347/718/917/929 and 212/332/646/917 NPA overlays. The 347/718/917/929 and 212/332/646/917 NPA customers would retain their current telephone numbers; however, 1+10-digit dialing for all calls within and between the 347/718/917/929 and 212/332/646/917 NPAs and the new NPA would be required. At the effective date of the boundary elimination, available central office (CO) codes in the 212/332/646/917 and 347/718/917/929 NPAs will be assigned in the combined geographic area. At exhaust of both the 347/718/917/929 and 212/332/646/917 NPAs supply of CO codes, all future CO code assignments will be made from the new NPA. The 212/332/646/917 NPA has one rate center, and the projected exhaust is 1Q2050. Eliminating the boundary between the 347/718/917/929 and 212/332/646/917 NPAs and assigning a new NPA would have a combined life of 14 years at the current assignment rate, and would combine the five New York boroughs and two geographic areas overlaid by the 917 NPA.

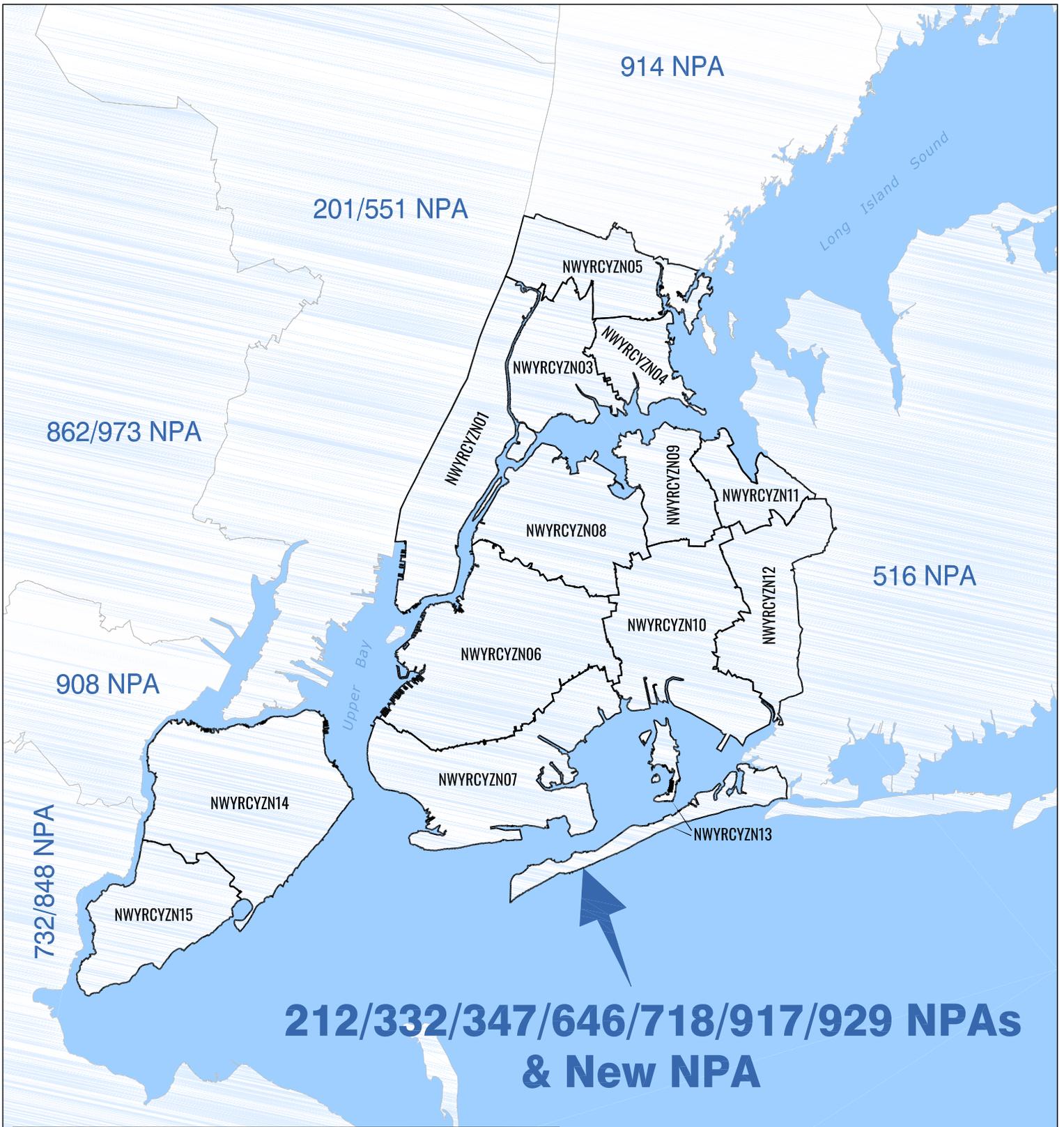


New York 347/718/917/929 NPA
Alternative #1 - All Services Overlay

NPA Boundary
 Rate Center Boundaries

December 2023

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**Alternative #2 - Rate Center Map
of Boundary Elimination Overlay
of 212/332/646/347/718/917/929 NPAs & New NPA**

— Rate Center Boundaries

December 2023

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EXHIBIT B



April 29, 2024

To: All 347/718/917/929 NPA Code Holders and Interested Industry Members (New York)

Subject: Final Minutes of the Initial Planning Meeting for the 347/718/917/929 NPA

Attached are the final minutes from the April 11, 2024, New York 347/718/917/929 NPA initial planning meeting. These minutes became final on April 26, 2024.

If you have any questions, I can be reached by phone at (925) 420-0130 or contact me by email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Lauriann Mullen – New York Department of Public Service
Paul Esmond – New York Department of Public Service
Paul Chromik – New York Department of Public Service

**NY 347/718/917/929 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE
FINAL MINUTES
April 11, 2024**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Cecilia then reviewed the agenda.

REVIEW CONSENSUS PROCESS

Cecilia stated that the Alliance for Telecommunications Industry Solutions (“ATIS”) approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a “Statement for the Record,” which could be conveyed at any point during the meeting.

NANPA’s ROLE AND RESPONSIBILITIES

Cecilia reviewed NANPA’s role and responsibilities as follows:

- Starts the relief planning process 36 months prior to exhaust of the NPA.
- Distributes the Initial Planning Document (“IPD”) at least four weeks prior to the first industry meeting, which was completed on March 13, 2024.
- Facilitates the meeting, permitting the telecommunications Industry of New York (“Industry”) to reach consensus on the relief alternative to be included in the regulatory filing.
- Determines any additional items to include in the relief filing with the New York Department of Public Service (“Commission”) such as the implementation intervals, dialing plan, and compliance with any state-specific requirements.
- Then, NANPA is charged with the responsibility of filing a relief petition on behalf of the Industry with the Commission. Once the Industry comes to consensus on what should be included in the filing, NANPA will complete the regulatory filing as decided by the Industry or as required by the state statute.

HISTORY OF 347/718/917/929 NPA

Cecilia stated that the New York 347/718/917/929 NPA complex is unique in that the 917 NPA overlays two separate NPA complexes, the 347/718/929 NPA and the 212/332/646 NPA. The last NPA relief in the 347/718/917/929 NPA was implemented in 2011, when the 929 NPA all-services distributed overlay was introduced.

REVIEW NPA CODE RELIEF PLANNING AND NOTIFICATION GUIDELINES (“Guidelines”)

Cecilia reviewed pertinent sections of the Guidelines (ATIS-0300061).

Cecilia reviewed Section 5.0, which states:

The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.

For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.

Cecilia reviewed section 6.3 of the Guidelines regarding an all-services distributed overlay which states:

An all-services distributed overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs. Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the SP’s discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a permissive dialing period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs. They are listed below:

Cecilia noted that there is more than one viable relief option available for the 347/718/917/929 NPA and also reviewed Section 6.3.2 of the Guidelines regarding a boundary elimination overlay which states:

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and available NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment

because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs and may require a longer implementation interval.

Cecilia also reviewed Section 7.2 of the Guidelines which states:

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

Cecilia then referred the Industry participants to Annex B of the Guidelines which lists issues to be considered during NPA relief planning, and Annex E which lists general attributes of the most common relief alternatives.

Cecilia stated that the referenced sections of the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

Cecilia reviewed the following pertinent documents that were also included in the meeting materials:

- Relief planning meeting aids
- Rate center lists
- Code holder lists

CENTRAL OFFICE (“CO”) CODE STATUS

As of April 10, 2024, the 347 NPA has 783 CO codes assigned, no CO codes available for assignment, and 17 unavailable CO codes. The 718 NPA has 779 CO codes assigned, no CO codes available for assignment, and 21 unavailable CO codes. The 917 NPA has 777 CO codes assigned, four (4) CO codes available for assignment, and 19 unavailable CO codes. The 929 NPA has 604 CO codes assigned, 182 CO codes available for assignment, and 14 unavailable CO codes.

There are 73 total service providers in the 347/718/917/929 NPA of which 15 have only thousands-blocks assigned.

As of April 10, 2024, the 212 NPA has 784 CO codes assigned, no CO codes available for assignment, and 16 unavailable CO codes. The 332 NPA has 122 CO codes assigned, 664 CO codes available for assignment, and 14 unavailable CO codes. The 646 NPA has 781 CO codes assigned, no CO codes available for assignment, and 19 unavailable CO codes. (See Attachment #2)

There are 81 total service providers in the 212/332/646/917 NPA of which two (2) have only thousands-blocks assigned.

THOUSANDS-BLOCK INFORMATION

Cecilia reported that there are 13 rate centers in the 347/718/917/929 NPA all of which are mandatory for pooling. From the period of April 1, 2023 to April 10, 2024, 912 blocks have been assigned and 80 CO codes have been assigned; 78 for pool replenishment and two (2) for LRNs. As of April 10, 2024, there are 98 blocks available for assignment to service providers. The forecasted demand for the next twelve months is 57 CO codes for pool replenishment and dedicated customers.

Cecilia reported that there is one (1) rate center in the 212/332/646/917 NPA which is mandatory for pooling. From the period of April 1, 2023 to April 10, 2024, 288 blocks have been assigned and 30 CO codes have been assigned; 27 for pool replenishment, two (2) for dedicated customers and one (1) for an LRN. As of April 10, 2024, there are 149 blocks available for assignment to service providers. There is no forecasted demand for the next twelve months. (See Attachment #3)

Cecilia stated that in the meeting notice, the 917-352, 917-394 and 917-955 NXX codes were listed for service providers to research and ensure they are no longer being used for special purposes. Cecilia then asked if there was any objection to releasing the NXX codes for assignment.

Dyan Adams, Verizon, stated that the 917-394 should be made available. It was on the list of blockable codes that should have been made available in 2018. She also noted that 917-352 and 917-955 were listed as being used for telethons and high volume calling and with an additional Verizon internal note about radio relay. Consensus was reached that the 917-352, 917-394 and 917-955 could be released and made available for assignment.

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS

The 212 NPA was created in 1947 as one of New York's original area codes and served all five boroughs of New York City. The 718 NPA was created by a geographic split of the 212 NPA in 1984. The 917 NPA was implemented in 1992 as the first overlay in the U.S. which overlaid both the 718 and 212 NPAs. The 347 NPA was added to the 718/917 NPA overlay in 1999 and in 2011, the 929 NPA was added to the 347/718/917 NPA overlay.

The 347/718/917/929 NPA overlay complex serves the boroughs of the Bronx, Brooklyn, Queens, Staten Island as well as the Marble Hill section of Manhattan.

Exhaust Forecast:

Cecilia stated that the October 2023 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2023 NRUF Report"), published by NANPA, indicated that the 347/718/917/929 NPA would exhaust during the first quarter of 2027. On March 22, 2024, NANPA issued a delta NRUF due to an increase in code assignments and the exhaust date was revised to the fourth quarter of 2026.

The October 2023 NRUF Report indicated that the 212/332/646/917 NPA is forecasted to exhaust in the first quarter of 2050.

Cecilia also reviewed the current dialing plan in the 347/718/917/929 and the 212/332/646/917 NPAs and a current map of the 347/718/917/929 NPA.

REVIEW OF RELIEF PLANNING OPTIONS

Cecilia presented two relief alternatives for the 347/718/917/929 NPA:

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 347/718/917/929 NPA overlay. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 347/718/917/929 NPA have been allocated. Customers would retain their current telephone numbers, and 1+10-digit local dialing would be required within and between the 347/718/917/929 and the new overlay NPA. There are 13 rate centers in the 347/718/917/929 NPA and at the current assignment rate, the projected life of this alternative would be 11 years.

ALTERNATIVE #2 – NPA BOUNDARY ELIMINATION OVERLAY AND NEW NPA

The boundary between the existing 347/718/917/929 and 212/332/646/917 NPAs would be eliminated and a new NPA would be assigned to the same geographic areas occupied by the existing 347/718/917/929 and 212/332/646/917 NPA overlays. The 347/718/917/929 and 212/332/646/917 NPA customers would retain their current telephone numbers; however, 1+10-digit dialing for all calls within and between the 347/718/917/929 and 212/332/646/917 NPAs and the new NPA would be required. At the effective date of the boundary elimination, available CO codes in the 212/332/646/917 and 347/718/917/929 NPAs will be assigned in the combined geographic area. When the 347/718/917/929 and 212/332/646/917 NPAs supply of CO codes exhaust, all future CO code assignments will be made from the new NPA. The 212/332/646/917 NPA has one rate center, and the projected exhaust is 1Q2050. Eliminating the boundary between the 347/718/917/929 and 212/332/646/917 NPAs and assigning a new NPA to the entire combined NPA area would have a life of 14 years at the current assignment rate and would reunite the five New York boroughs under one NPA area as well as the two geographic areas overlaid by the 917 NPA.

Cecilia also stated that the boundary elimination overlay with a new NPA would allow for future relief to potentially require only one NPA to overlay the two existing geographic areas, thus potentially saving one NPA.

Cecilia also reviewed the maps for each relief alternative.

CONSENSUS ON THE RELIEF ALTERNATIVE

The Industry discussed the pros and cons for each relief alternative to determine which alternative would be recommended to the Commission. A proposal was made, and consensus was reached, to recommend Alternative #1, an All-Services Distributed Overlay, due to impacting fewer customers, being easier to implement, and in addition to the support of the pros and cons listed for each alternative. The All-Services Distributed Overlay will be included as the Industry's choice of relief in the petition filed with the Commission.

Following are the pros and cons for each relief option that were utilized by the Industry to reach consensus on the recommended alternative:

Alternative #1 - All-Services Distributed Overlay

Pros:

Alternative #1	
1	All existing customers would retain the 347/718/917/929 area code and would not have to change their telephone number.
2	Less customer confusion and easier education process.
3	Minimizes call routing issues, especially with ported numbers.
4	Easier for service providers to implement from a translations, billing and service order system perspective.
5	Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table.
6	No technical impacts to number portability, text messaging or multimedia messaging.
7	An all-services distributed overlay is simpler to implement from both a technical and customer education perspective.

Cons:

Alternative #1	
1	The all-services distributed overlay has a shorter life than the boundary elimination overlay with a new NPA.

Alternative #2 - Boundary Elimination Overlay with a New NPA

Pros:

Alternative #2	
1	Does not require customers to change their area code.
2	It is a more efficient use of resources.
3	Boundary elimination alternative with a new NPA has a longer life than the all-services distributed overlay.
4	Reunites the five New York Boroughs

Cons:

Alternative #2	
1	Impacts a larger quantity of customers than the all-services overlay
2	Complex customer education process, which would likely lead to increased customer confusion.
3	Would reduce the current exhaust of the 212/332/646/917 NPA by 10 years.
4	This boundary elimination overlay is much more difficult to implement from both a technical and customer education perspective.
5	Both the boundary elimination overlay and the all-services distributed overlay require an additional NPA to be implemented; the additional work required for the boundary elimination overlay exceeds the benefit of the additional three years of life.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

Cecilia stated that because this area is already a multiple NPA overlay, the dialing plan in place would not need to change. Consensus was reached on the following dialing plan:

Dialing Plan for the 347/718/917/929 NPA all-services distributed overlay:

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA)	1+10 digits (1+NPA-NXX-XXXX)*
	Foreign NPA (FNPA)	1+10 digits (1+NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*10-digit local dialing permissible

Implementation Schedule

After discussion on a suggested implementation schedule, consensus was reached on a nine (9)-month implementation schedule as follows:

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	Nine (9) months
Earliest Activation of CO codes in the new NPA *	At completion of Customer Education and Network Preparation Period and after all 347/718/917/929 NPA CO codes are allocated Six (6) months prior to exhaust

*CO codes in the new NPA will not be assigned until all available CO codes in the existing 347/718/917/929 NPA are allocated.

CUSTOMER EDUCATION AND TECHNICAL MILESTONES:

A recommendation was made, and consensus was reached to include the following *Customer Education and Technical Milestones* for the 347/718/917/929 NPA All-Services Distributed Overlay implementation.

	Responsibility
1 Issue single customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release announcing the additional overlay NPA.	Commission; Service Providers to the extent they are able to do so
3 Send Special Letters to Directory Publishers	Co-chairs of Industry committee
4 Update social media with information	All Service Providers (optional) and NANPA

regarding additional overlay NPA.	
5 Update websites with information regarding the additional overlay NPA.	All Service Providers
6 Develop language for use in Directories to alert the consumers of the additional overlay NPA.	Directory Publishers
7 Issue second press release just prior to the additional NPA effective date	Commission; Service Providers to the extent they are able to do so

Technical Milestones:

	Responsibility
1 Obtain industry test code from NANPA and activate the test number	One Service Provider Volunteer
2 Open the test code in carriers' network	All Service Providers
3 Establish NPA Specific type of Trunks	All Service Providers (as needed)
<u>E911 Work Plan</u>	
4 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
5 Ensure SRDB table has new NPA built	E911 Providers
6 Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
7 Notify Statewide 911 Coordinator	Industry Co-chairs
8 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
9 Update PSAP equipment to recognize new NPA	PSAP's
10 Trunk Orders Complete	E911 Providers
11 Build E911 Network/Tandem Translations	E911 Providers
12 Verify if all PSAP work has been completed	E911 Providers
13 Activate E911 Network/Tandem Translations	All Service Providers

The above are the typical milestones necessary for implementation of an additional all-services distributed overlay when mandatory 1+10-digit dialing is already in place; however, these may need to be modified during the actual implementation.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Cecilia reviewed the schedule for the remaining activities until the NY 347/718/917/929 NPA petition is filed with the Commission. Consensus was reached on the following schedule:

NY 347/718/917/929 NPA Relief Planning Schedule

April 25 – Draft Minutes Posted via NNS

May 2 – Meeting Minutes Become Final

May 9 – Post Draft Petition via NNS

May 16 – Draft Petition Review Meeting at 1:00 PM ET

May 30 – File Petition with New York Department of Public Service

NANPA will file the petition for relief with the Commission informing them of the outcome of this relief planning meeting. The petition will be filed no later than May 30, 2024, NANPA will post a draft petition no later than May 9, 2024, and the Industry will reach consensus on the final petition at a meeting scheduled for May 16, 2024.

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD

There were no additional items for discussion or statements for the record.

MEETING MINUTES DISTRIBUTION AND APPROVAL OF THE MINUTES

The draft minutes resulting from this meeting will be distributed to the Industry by posting them on the NANPA website no later than April 25, 2024. The Industry is to provide any suggested edits to Cecilia McCabe via email at cmccabe@nanpa.com within one week of the posting at which time they will become final.

The meeting was adjourned.

###

These minutes became final on April 26, 2024.

**NY 347/718/917/929 NPA
Initial Relief Planning Meeting
April 11, 2024
Participants**

NAME	COMPANY
Angelo Topis	Altice
Deborah Anstead	Altice
Huong Le	Altice
Margaret Cox	CenturyLink/Lumen
Rita Schmitz	CenturyLink/Lumen
Melinda Yost	DISH Wireless
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Florence Weber	NANPA
Paul Esmond	NY Department of Public Service
Paul Chromik	NY Department of Public Service
Allyson Blevins	Sinch
Becky Morrow	Sinch
Dylan Cruz	RTC
Karen Riepenkroger	T-Mobile
Shaunna Forshee	T-Mobile
Chanda Brown	Verizon
Dyan Adams	Verizon
Brandon Orozco	Verizon
Dana Crandall	Verizon Wireless

THOUSANDS-BLOCK STATISTICS		
ST/NPA:	NY 347/718/917/929	NY 212/332/646/917
MEETING DATE:	4/11/2024	4/11/2024
RATE CENTERS		
<i># Total</i>	13	1
<i># Mandatory</i>	13	1
<i># Mandatory-Single Service Providers (M*)</i>	0	0
<i># Optional</i>	0	0
<i># Excluded</i>	0	0
BLOCKS ASSIGNED		
<i># Total</i>	912	288
<i>(For time period 4/01/23 - 4/10/24)</i>		
BLOCKS AVAILABLE		
<i>#Total</i>	98	149
<i>(As of preparation date: 4/10/24)</i>		
CODES ASSIGNED		
<i># Total</i>	80	30
<i># for Pool Replenishment</i>	78	27
<i># for Dedicated Customers</i>	0	2
<i># for LRNs</i>	2	1
<i>(For time period 4/01/23 - 4/10/24)</i>		
CODES FORECASTED		
<i># Total</i>	57	0
<i># for Pool Replenishment and Dedicated Customers</i>	57	0
<i># for LRNs</i>	0	0
<i>(For the next twelve months as of: 4/10/24)</i>		