

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
Albany on April 23, 2008

COMMISSIONERS PRESENT:

Garry A. Brown, Chairman  
Patricia L. Acampora  
Maureen F. Harris  
Robert E. Curry, Jr.  
Cheryl A. Buley

CASE 07-C-1486 - Proceeding on Motion of the Commission, Pursuant to Section 97(2) of the Public Service Law, to Institute a Proceeding to Investigate and Evaluate Options for Making Additional Central Office Codes Available in the 315 Area Code Region.

ORDER DENYING PETITION OF PUBLIC UTILITY LAW PROJECT

(Issued and Effective April 25, 2008)

BY THE COMMISSION:

INTRODUCTION

On December 20, 2007, we instituted a proceeding<sup>1</sup> to develop a workable plan to provide additional central office codes in the 315 area code region following the North American Numbering Plan Administrator's (NANPA) advisory to the Commission of an impending exhaust of assignable NXX codes<sup>2</sup> in that region in the third quarter of 2010.<sup>3</sup> In furtherance of that plan, we invited comment on a White Paper prepared by

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<sup>1</sup> Case 07-C-1486, Area Code Relief in the 315 Region, Order Instituting Proceeding (issued December 20, 2007).

<sup>2</sup> An NXX code is a three-digit number following the area code in a ten-digit telephone number: NPA-NXX-XXXX. An NXX code is a block of 10,000 numbers.

<sup>3</sup> Impending exhaust of an area code is projected by NANPA when forecasted and/or actual demand for NXX codes in an area code will exceed known supply within 36 months.

Department of Public Service Staff (Staff) which outlined several options for area code relief.<sup>4</sup>

Our determination to proceed with a plan for area code relief in the 315 region was challenged by the Public Utility Law Project of New York, Inc. (PULP) in a Motion for Interlocutory Relief filed on March 14, 2008. PULP maintained that, instead of developing and evaluating options for 315 area code relief, the Commission should investigate whether the need for area code relief in the 315 area code region could be eliminated by using existing numbering resource conservation measures. In a Notice issued March 24, 2008, we 1) deemed PULP's request for interlocutory relief an untimely petition for rehearing, 2) invited comment regarding PULP's request, and 3) suspended the comment period for the Staff White Paper.

Comments on the PULP petition were received from AT&T, Sprint, and the Cable Telecommunications Association of New York (CTANY); PULP filed Reply Comments on April 3, 2008.

#### PULP PETITION

PULP requests that this Commission delay its proceeding to evaluate 315 area code relief options, and instead, commence an investigation and a technical conference to determine if there is even a need for area code relief. PULP's request is based on its belief that existing numbering resources have been misallocated and/or misused, and that if existing numbering resource conservation measures are diligently applied, adequate existing numbering resources may exist which could make area code relief unnecessary at this time.

PULP contends that the impending exhaust of assignable numbers in the 315 area code region may be due, in part, to multiple assignment of 10,000 number NXX codes to certificated telephone service providers in many low population rate centers in

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<sup>4</sup> Case 07-C-1486, supra, Notice Inviting Comments on Staff White Paper (issued March 3, 2008).

the 315 region, as well as use of NXX codes to support voice over internet protocol (VoIP) and/or cable-based telephone service providers. PULP also asserts that more effective reclamation of numbering resources could have eliminated the assignment of entire 10,000 number NXX codes.

PULP argues that the assignment of multiple 10,000 number NXX codes to new carriers in a number of rate centers in the 315 area resulted in NANPA's assignment of 83 per cent of potential NXX codes while residents and businesses used only 34 per cent of the numbers within those NXX codes. PULP cites examples of multiple assignments of 10,000 number NXX codes in the same exchange after 2005, and claims that carriers should have drawn down 1000 number blocks from the number pool and returned unused blocks to the pool.

PULP maintains that reclaiming unused NXX codes, or 1000 number blocks within the NXX codes, would negate the need for immediate area code relief, and, therefore, spare consumers the cost and disruption associated with having to adjust to a new area code. In making this argument, PULP assumes that number conservation and reclamation efforts would eliminate the NXX code exhaust situation in the 315 region.

#### COMMENTS ON PULP PETITION

##### AT&T

AT&T does not object to an investigation of PULP's assertions regarding use of numbering resources in the 315 region, since adequate numbering resources are of paramount importance to both industry and consumers. However, AT&T states that any such investigation should not delay the area code relief implementation process because sufficient lead time is required to implement whatever method for area code relief is chosen.

AT&T recognizes that growing public demand for a variety of technologies, particularly wireless services, drives number assignment requests while inability to transfer numbers unused in one rate center to another center limits deployment. Therefore, AT&T does not believe that granting PULP's request for an

investigation will identify numbering resources sufficient to defer NANPA's projected exhaust date of 2010.

Alternatively, any investigation should require that PULP support its allegations of industry numbering guideline noncompliance and submit suggestions for guideline improvements that include commercially reasonable, competitively neutral, FCC-compliant number conservation proposals.

Sprint

Sprint contests any claim of noncompliance with numbering resource rules in the 315 region. While Sprint serves the cable telephone market in the 315 region, through arrangements with cable companies that resell Sprint's long distance services and use Sprint's back office system and network assets over cable facilities, it denies PULP's claim that these arrangements evade state or federal numbering conservation measures.

Sprint states that when it began offering service in a given rate center within the 315 area code, it first checked 1000 number block pool availability before submitting any request to open a new NXX code. In some instances, none were available. Sprint maintains that telephone companies did not donate 1000 number blocks in many of the Citizens Telecommunications Company of New York d/b/a Frontier Communications of New York (Citizens) exchanges in the 315 area code until eight months after one request and almost a year in the case of another request, therefore, making it impossible for Sprint to obtain 1000 number blocks from a pool.

In the interest of competitive neutrality, Sprint urges that any investigation ordered by the Commission should analyze numbering resource patterns used by all carriers in the 315 region, including those carriers operating prior to Sprint entering the 315 market.

CTANY

CTANY takes issue with PULP's contention that the projected 315 area code exhaust is due to misuse of numbering resources or gaming of the number allocation process by providers of interconnected VoIP service. CTANY states that this Commission and the Federal Communications Commission (FCC) determined that VoIP

providers may acquire and use telephone numbers. Moreover, CTANY states that the FCC affirmed a wholesale carrier's right to interconnect for the purpose of exchanging VoIP traffic. Interconnected VoIP provider and CLEC arrangements allowing VoIP providers to obtain telephone numbers were also recognized by the FCC.

CTANY further states that use of numbering resources by VoIP providers is not responsible for accelerating area code exhaust in the 315 region. It maintains that giving credibility to PULP's unsupported claims would result in not only delay detrimental to implementation of area code relief, but also distortion to the code relief process.

#### PULP Reply Comments

In addition to its initial request that the Commission investigate conservation measures to obviate the need for area code relief, PULP interposed Reply Comments, filed on April 3, 2008, restating its position that the Commission should not go forward with its proceeding to develop a plan for 315 area code relief until it had also investigated 1) delay by incumbent carriers (such as Verizon or Citizens) in returning 1000 number blocks; 2) carriers' use of assigned numbers; 3) assignment of multiple NXX codes in single exchange rate centers; and 4) individual code assignments to competitive local exchange carriers (CLECs) for the same rate center rather than assignment from a pool of returned 1000 number blocks. PULP also sought to clarify its position with regard to the ability of VoIP providers to obtain numbers, stating that it takes no issue with a certificated carrier obtaining numbers for VoIP providers.

### BACKGROUND

#### History of Numbering

The United States, Canada, and the Caribbean were divided into 83 zones under a plan begun in 1947 to insure that all public switched telephone networks were incorporated into an integrated nationwide network. Termed the North American Numbering Plan or NANP, the plan was historically administered by the monopoly Bell System companies. However, in the mid-90s, coincident with the advent of nationwide

telecommunications competition, the FCC created the position of a neutral North American Numbering Plan Administrator (NANPA), to assign NXX codes in the United States and to forecast NXX/area code exhaust.<sup>5</sup> Initially, and periodically thereafter, the FCC selected an entity (currently Neustar) to be the NANPA via a competitive bidding process.

Under the NANP, discrete geographical regions or zones are identified by a three digit number, referred to as a Numbering Plan Area (NPA) or area code. Each telephone line within an area code is assigned a unique ten-digit number consisting of an area code, a three-digit rate center specific NXX code, and a four-digit station code, e.g., 518-555-1212, in which 518 is the area code, 555 is the NXX code, and 1212 is the station code. Prior to pooling, because NXX codes are geographically specific, i.e., a given NXX code cannot be used in any other rate center within the area code, telephone service providers had to obtain an NXX code for each and every rate center within an area code in which they sought to do business. Therefore, NXX codes containing 10,000 telephone numbers were typically allocated to multiple carriers in many rate centers within an NPA. For example, a new telephone service provider seeking to provide service in an NPA containing 20 rate centers could potentially require 20 NXX codes, one per rate center, or 200,000 numbers.

In the last decade, competition by new entrants, use of wireless services, and proliferation of telephone lines to support Internet, data, and facsimile service, all created demand for numbering resources. In such a legacy system tied to geographic allocation, where demand for numbers is high, and where consumers are entitled to seek telecommunications services from a variety of competitive carriers, assignment of multiple NXX codes in multiple rate centers within an area code has contributed to NXX

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<sup>5</sup> Section 251(e) of the Communications Act of 1934, as amended, granted the FCC plenary jurisdiction over telephone numbering issues in the United States, and also allowed the FCC to delegate all or part of its numbering administration jurisdiction to state commissions.

code exhaust even though there are likely to be many unused telephone numbers in individual rate centers.

Conservation and Number Pooling

In response to the increase in demand for numbering resources and the growing frequency of area code exhaust proceedings, this Commission took a proactive stance and began implementing numbering conservation measures. In July 1998, we began voluntary 1000 number block pooling trials in which carriers requesting number resources were allotted a block of 1000 numbers rather than the legacy 10,000 number code. Subsequently, we petitioned the FCC for authorization to mandate statewide 1000 number block pooling. In response to our FCC petition seeking, inter alia, authority to ensure more efficient assignment of numbering resources and to avoid unnecessary introduction of new area codes, the FCC granted us authority in 1999 to (1) implement thousands block number pooling; (2) implement individual telephone number pooling; (3) implement unassigned number porting; (4) require carriers to meet minimum fill rates prior to assignment of additional numbering resources; (5) reclaim unused NXX codes and thousands blocks; (6) require submission of number utilization surveys prior to granting additional number resources; (7) audit carriers' use of numbering resources; and (8) address extraordinary need for numbering resources in an NPA subject to a rationing plan.<sup>6</sup>

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<sup>6</sup> In the Matter of New York State Department of Public Service Petition for Additional Delegated Authority to Implement Number Conservation Measures, CC Docket No. 96-98, 14 FCC Rcd 17467 (rel. September 15, 1999).

As a result of the FCC's authorization, we issued a number pooling order in December 1999 <sup>7</sup> which established mandatory 1000 block number pooling in the 716 Numbering Plan Area (NPA) by April 1, 2000. The 716 area code was chosen primarily because it was already in projected NXX code exhaust. On March 17, 2000, we issued a statewide number pooling and reclamation order which required number pooling in all area codes in New York State pursuant to a schedule set forth in that Order.<sup>8</sup> Because most carriers serving rural or semi-rural areas were either not Local Number Portability (LNP)-capable or were the only carriers serving the area at the time, they were exempt in our order from state pooling requirements. Therefore, pooling could not occur until these carriers either became LNP-capable or received a request for interconnection from another carrier. Included in the exempt category were many of the independent companies in New York State, as well as most of the exchanges served by Citizens Telecommunications Company. On December 13, 2000, we adopted reclamation procedures for unused codes.<sup>9</sup>

In 2005, LNP-capable carriers began requesting interconnection and assignment of NXX codes in many rural or semi-rural areas of New York State. As

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<sup>7</sup> Case 98-C-0689, Efficiency of Numbering Resources and Options for Making Central Office Codes and/or Area Codes Available, Order Instituting Wide Area Rate Centers and Number Pooling (issued December 2, 1999). The December 2 Order also required all local exchange carriers to implement wide area rate centers in New York State. However, the requirement was suspended on December 10, 1999, pending evaluation of financial and operational issues associated with wide area rate implementation. [Case 98-C-0689, supra, Dates for Tariff Filing (issued December 10, 1999)]. The proceeding was subsequently closed.

<sup>8</sup> Case 98-C-0689, supra, Order Instituting State-Wide Number Pooling and Number Assignment and Reclamation Procedures (issued March 17, 2000).

<sup>9</sup> Case 98-C-0689, supra, Order Adopting Procedures and Standards for Reclamation of Central Office Codes (issued December 13, 2000).



requested by the National Pooling Administrator, we petitioned the FCC<sup>10</sup> to clarify the status of rate centers affected by the FCC's 2002 order.<sup>11</sup> Alternatively, we requested authorization to establish mandatory number pooling in all area codes in New York State. In November 2006, the FCC granted that authority in part.<sup>12</sup> In March 2007, we implemented the FCC delegation of authority and directed all telephone providers in New York to participate in mandatory 1000 number block number pooling in specified area codes,<sup>13</sup> including those in the 315 area code region. Implementation of the aforementioned number conservation measures actually extended the 315 area code exhaust date initially projected by NANPA from 2002 to 2010.

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<sup>10</sup> In the Matter of Numbering Resource Optimization, Petition of New York State Department of Public Service for Mandatory Pooling, CC Docket No. 99-200, DA 06-2299, 21 FCC Rcd 13188 (rel. November 9, 2006).

<sup>11</sup> In 2002, the FCC required mandatory number pooling for the 100 largest Metropolitan Statistical Areas (MSAs) in the United States but also exempted rate centers in which carriers were not LNP-capable or in which there was only one local service provider. In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, DA 02-948, 17 FCC Rcd 7347 (rel. April 24, 2002).

<sup>12</sup> Supra, note 10. In the November 2006 decision, the FCC delegated authority to the Commission to implement thousands block number pooling in the 212/646, 315, 518, 631, and 845 NPAs but not the 516, 585, 607, 761, 718/347 and 914 NPAs, as had been requested, based on the FCC's finding that those NPAs were not in jeopardy or projected to exhaust within a six to twenty year period, while the 212/646, 315, 518, 631, and 845 NPAs were projected to exhaust within five years. In addition, in response to the New York State Telecommunications Association's request for a waiver from mandatory pooling requirements, the FCC restricted its delegation of authority by requiring implementation consistent with the federal exemption for rural telephone companies (and Tier III CMRS providers) that had not received a request for LNP from another carrier or were the only service provider obtaining numbering resources in a given rate center.

<sup>13</sup> Case 06-C-1521, Mandatory Telephone Number Pooling in Certain Area Codes of the State, Order Directing Telephone Service Providers to Comply with Number Pooling (issued March 29, 2007).

## DISCUSSION

### Pooling Requirements

One of PULP's main contentions is that, in many instances, carriers requesting numbers in area code 315 should have obtained smaller blocks of 1000 numbers from a number pool instead of full NXX codes containing 10,000 numbers. Although we ordered mandatory pooling in the 315 area code region by 2001, as previously noted, the National Pooling Administrator required an FCC order clarifying our authority to mandate statewide number pooling in rate centers in which carriers were not LNP-capable or in which there was only one local service provider. Following receipt of this clarification in November 2006, we issued our March 2007 Order mandating statewide number pooling in additional rate centers. As a result of this Order, a pooling implementation schedule was established by Neustar to allow time for carriers to review their numbering inventories and donate excess resources back to a pool. For these additional rate centers, 1000 number blocks were to become available for assignment to other carriers by October 31, 2007. Therefore, before October 31, 2007, any competitive carrier requiring numbering resources in a rate center that was not within the 100 largest FCC designated MSAs or in which a pool was not already established, would have been assigned a full NXX code containing 10,000 numbers, and any carrier requiring numbering resources in a rate center after October 2007 typically would be issued a 1000 number block rather than a full NXX code containing 10,000 numbers.<sup>14</sup> During the pendency of implementation of statewide mandatory pooling, Staff negotiated with the Pooling Administrator and any new carrier entrants to donate blocks from the new NXX code to create number pools in each rate center in order to ameliorate the effect of assignment of full NXX codes.

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<sup>14</sup> While pooling may be mandated in a given rate center, the incumbent carrier is not required to participate in pooling until a competing carrier requests interconnection or submits an order to port a number.

Assignment and Reclamation of NXX Codes and 1000 Number Blocks

There are four primary reasons why a new 10,000 number NXX code would be opened in a given rate center.

1. The carrier needs a Local Routing Number (LRN) for a new switch.
2. There are no 1000 blocks available in the pool for that rate center.
3. Pooling is not required for that rate center.
4. Expected growth based on six-month forecasts for all carriers in a rate center requires the opening of a new 10,000 number NXX code (pool replenishment).

Carriers requesting either 1000 number blocks or full 10,000 number NXX codes must document the validity of their requests. Staff reviews and verifies all numbering code and block requests on a regular basis. If adequate documentation is not provided, Staff notifies NANPA or the Pooling Administrator to suspend a request. NANPA and the Pooling Administrator monitor forecast and utilization levels to ensure that numbers are not being stockpiled.

Once 10,000 number NXX codes or 1000 number blocks are assigned, they are monitored by NANPA or the Pooling Administrator for activation and are reclaimed if unused within six months of assignment.<sup>15</sup> Staff also performs reclamation on an annual basis. Twice annually, NANPA issues a number resource utilization forecast (NRUF) report which shows utilization for each block assigned, as reported by the carriers. If two consecutive reports indicate that insufficient numbers have been used from an assigned block, Staff contacts the carrier to verify the information, and if the

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<sup>15</sup> Pursuant to the Industry Numbering Committee's Central Office Code Assignment Guidelines and Thousands Block Number Pooling Administration Guidelines, carriers must activate the NXX codes or 1000 number blocks assigned to them within six months. If the code or block is not activated, it is considered delinquent and NANPA or the Pooling Administrator will notify Department Staff. If Staff's investigation determines that the code or block is not going to be activated, NANPA or the Pooling Administrator is instructed to reclaim the resource. This procedure is performed on a monthly basis.

report is accurate, Staff requests that the carrier return the blocks. If the blocks are not returned by the carrier, Staff prepares a Commission order directing their return. In 2007, the combined efforts of NANPA, the Pooling Administrator and Department Staff resulted in the return of 50 codes and 1,754 blocks statewide.

#### PULP's Arguments

PULP questions how the 315 area code can exhaust given 6.5 million telephone numbers assigned to a population of 1.4 million .<sup>16</sup> This question seemingly equates area code exhaust with telephone number supply. However, the 315 area code is not in an exhaust situation because it is running out of individual telephone numbers, but because it is running out of 10,000 number NXX codes, the criterion NANPA uses to declare area code exhaust.

PULP argues that carriers' assignment and use of full 10,000 number codes accelerated area code exhaust, but number pooling could have significantly delayed the need for a new area code. Implicit in PULP's argument that number pooling would have extended the 315 area code is the assumption that the return of unused blocks of numbers would have made more codes available for subsequent use. As previously mentioned, NXX codes cannot be used outside of the rate center to which they are originally assigned. Therefore, if a block of numbers assigned to rate center X is returned unused to the pool, those numbers can only be re-assigned within rate center X. A carrier requesting assignment of numbers for rate center Y could not use rate center X-specific numbers. Therefore, geographic limitations on the use of pooled numbers restrict number availability throughout an area code, and often result in opening of full codes even though there may be a reservoir of numbers in a nearby rate center.

In addition to the previously discussed geographic rate center restrictions limiting use of pooled numbers, there are also restrictions on reclaiming number blocks in which telephone numbers have been assigned to customers. Before number pooling was available in the 315 region, any carrier requesting telephone numbers in a given rate

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<sup>16</sup> PULP Motion, p. 11.

center was assigned an entire 10,000 number NXX code, even though it might have only 1000 customers in that rate center. However, once numbers within these NXX codes have been assigned to customers, the codes cannot be reclaimed by NANPA.<sup>17</sup>

Other measures suggested by PULP to reclaim numbers and extend the 315 area code are 1) enforcement of Commission numbering resource allocation orders; 2) diligent reclamation of assigned but unused NXX codes; and 3) systemic changes to the numbering system.<sup>18</sup> In fact, Staff aggressively enforces Commission numbering conservation requirements and reclaims underutilized NXX codes and blocks in order to conserve 315 numbering resources.<sup>19</sup> As discussed previously, Staff examines utilization records and contacts carriers assigned codes and/or blocks from which insufficient numbers have been used, and routinely requests that carriers return all unused blocks and codes.<sup>20</sup> Conservation and reclamation measures for which this Commission requested and received delegated authority from the FCC are diligently pursued.

In furtherance of its argument that measures have not been taken to properly assign and conserve numbers in the 315 area, and that original NXX codes should have been sufficient to meet demand, PULP provides two attachments. Attachment A lists 45 rural rate centers with relatively low population levels where a full NXX code was assigned to a competitive carrier, most notably Sprint where, in PULP's view, the original NXX code should have been sufficient to meet demand. Attachment B lists 11 rate centers where full NXX codes were assigned in those rate centers to multiple

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<sup>17</sup> As a result of mandatory pooling, uncontaminated (unassigned) or underutilized blocks, however, must now be returned to the pool.

<sup>18</sup> PULP Motion, p. 5. To the extent that systemic changes to the NANP must be undertaken on a nationwide basis, they are outside the scope of state commission authority.

<sup>19</sup> Staff routinely reviews applications for 1000 number blocks and 10,000 number codes on a daily basis.

<sup>20</sup> For example, Sprint consistently returns unused blocks to the pools in the 315 region.

carriers. Staff examined each of the rate centers listed on the PULP attachments and reports that, of the total of 89 NXX codes cited by PULP in its Attachments, only one code may have been opened inappropriately.<sup>21</sup> In fact, most of the rate centers cited by PULP were not required to pool until after the Commission's March 2007 order.

A chart attached to this Order (Attachment 1) details each of the NXX codes issued for those rate centers to which PULP specifically objected and notes when and why the codes were opened, and what carriers have been assigned numbering resources in each rate center.

PULP suggests in its filing that an inquiry into contractual relationships between competitive carriers and their VoIP provider customers regarding use and sale of numbering resources is also warranted. NANPA only provides numbers to entities licensed or certificated as carriers pursuant to the Telecommunications Act.<sup>22</sup> Therefore, VoIP providers generally obtain telephone numbers for their customers by partnering with a carrier eligible for direct NANPA number assignments. Because the FCC opted not to regulate this numbering partnership between NANPA eligible carriers and VoIP providers, the VoIP providers' use of intermediate telephone numbers is not unlawful or in violation of specific numbering resource requirements.

#### Rehearing and/or Reconsideration Petition

In its motion, PULP requested relief pursuant to 16 NYCRR §4.7, which provides for Commission interlocutory review of a presiding officer's ruling. However, not only was there no underlying ruling to review in this proceeding, but more importantly, PULP's motion essentially challenged the premise underlying our determination to proceed with a plan for area code relief, i.e., that such relief was

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<sup>21</sup> While some competitive carriers did not pool in some exchanges as directed by the Commission, this did not result in the unnecessary assignment of NXX codes because there were sufficient blocks available from carriers who had donated to the various rate center pools to fulfill subsequent requests for numbers.

<sup>22</sup> 47 CFR §52.15(g)(2)(i),

necessary and could not be forestalled by additional conservation measures. Because we understand and appreciate both the economic consequences and individual impacts that area code relief presents, we exercised our discretion to address the issues raised by PULP. Accordingly, PULP's request was designated an untimely petition for rehearing and/or reconsideration<sup>23</sup> of our December 20, 2008 Order, pursuant to PSL §22 and 16 NYCRR §3.7.

Our rules provide that “[r]ehearing may be sought only on the grounds that the Commission committed an error of law or fact or that new circumstances warrant a different determination.”<sup>24</sup> Although PULP maintains that numbering resources in the 315 region were misallocated and/or misused because, inter alia, conservation measures such as mandatory pooling were not used to prevent multiple assignments of NXX codes, its argument is a retrospective evaluation that not only does not take into account our efforts to implement mandatory pooling, as previously documented and discussed in detail, but also does not rise to the level of error of law or fact required to warrant reconsideration of our decision. In addition, conservation measures such as mandatory pooling were part of an ongoing process undertaken to maximize efficient use of numbering resources, and, therefore, do not present new circumstances. Similarly, PULP's initial suggestion that numbering partnerships between NANPA eligible carriers and VoIP providers should be scrutinized for evasion of federal and state numbering conservation measures, which was subsequently clarified in PULP's Reply Comments to reflect PULP's position that CLEC/VoIP provider numbering partnerships presented no issue per se, also does not meet the requisite standard of error of law or fact, since the FCC opted not to regulate these activities.

Staff's analysis establishes that geographic and other restrictions limit reassignment of numbers. Therefore, PULP's contention that prior multiple assignments

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<sup>23</sup> The Commission has discretion to consider an untimely application for rehearing (PSL §22).

<sup>24</sup> 16 NYCRR §3.7(b).

of full 10,000 block NXX codes could be reclaimed and used to prevent area code relief does not present either new circumstances warranting reconsideration or errors of law or fact.

PULP adduces no facts, other than those we have previously considered, and fails to establish the legal or factual error required to grant a request for rehearing and/or reconsideration. Based on NANPA's projection, the 315 area code will exhaust by 2010, and the process to implement a new area code in any region is lengthy. This Commission has a responsibility to ensure that residents of the State of New York have continuous telecommunications service, for which adequate numbering resources is a key component. We find nothing in PULP's Petition that would warrant reconsideration of our determination to implement area code relief in the 315 region.

### CONCLUSION

Although this Commission initiated numbering resource conservation and reclamation procedures in New York even as competitive markets for local service emerged, the legacy number assignment processes that existed prior to the implementation of mandatory pooling and reclamation of numbering resources, have, without a doubt, created "stranded" telephone numbers in the 315 region. However, our number conservation measures used by our Department Staff delayed the need for area code relief in the region for eight years,<sup>25</sup> and these measures will continue to provide number utilization benefits in the future.

Staff has diligently audited and monitored numbering resources in New York State for many years, and consistently identifies and reclaims unused numbers. However, number assignment and area code exhaust projections are determined at the

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<sup>25</sup> In 1999, the 315 area code was projected to exhaust, however, before any action was taken on a relief plan, several numbering conservation efforts such as reclamation of underused NXX codes and number pooling were implemented and the projected exhaust date was extended until 2010



federal level on a 10,000 number basis, and, based on assignment of full 10,000 number NXX codes in New York, NANPA has projected code exhaust in 315 by late 2010.

After a detailed examination of PULP's petition, we find no basis for concluding that improper procedures were followed in either the assignment or the reclamation of telephone numbers in New York. Therefore, further investigation into assignment, use, or re-assignment of NXX codes is not warranted. In addition, PULP's petition does not demonstrate the requisite legal or factual error or new circumstances warranting reconsideration. We find no basis for delaying our proceeding to develop a workable plan to provide additional central office and area codes beyond the projected exhaust date of 2010. Therefore, based on the reasons outlined in this Order, PULP's petition for rehearing and/or reconsideration of the options outlined in the Staff White Paper is denied.

The Commission orders:

1. The Public Utility Law Project of New York, Inc.'s Motion for Interlocutory Relief, designated as a Petition for Rehearing and/or Reconsideration, is denied.
2. This proceeding is continued.

By the Commission,

(SIGNED)

JACLYN A. BRILLING  
Secretary

## RATE CENTER DATA IN RESPONSE TO PULP PETITION

CASE 07-C-1486

| RATE CENTER | NPA | NXX | SERVICE PROVIDER                                   | NOTES*                                                                          |
|-------------|-----|-----|----------------------------------------------------|---------------------------------------------------------------------------------|
| ADAMS       | 315 | 203 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 12/06, blocks donated 3/07                           |
| ADAMS       | 315 | 232 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                 |
| ADAMS CTR   | 315 | 284 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 6/07                            |
| ADAMS CTR   | 315 | 583 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                 |
| ALEXNDRI BY | 315 | 215 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 3/99, blocks donated 3/02                            |
| ALEXNDRI BY | 315 | 215 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 12/06                                                |
| ALEXNDRI BY | 315 | 215 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/07                                                 |
| ALEXNDRI BY | 315 | 482 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, 1 contaminated block donated 2/05 |
| ALEXNDRI BY | 315 | 517 | TELCOVE ATLANTIC, INC. - NY                        | Assigned prior to pooling, 7/99, blocks donated 4/02                            |
| ALEXNDRI BY | 315 | 588 | USD CLEC, INC. - NY                                | Assigned prior to NANPA and prior to pooling, blocks donated 1/03               |
| ALEXNDRI BY | 315 | 948 | NORTHLAND NETWORKS                                 | Assigned prior to NANPA and prior to pooling, donated blocks in progress        |
| BALDWINSVL  | 315 | 303 | CSTC LLC - NY                                      | Received an assigned block 10/07                                                |
| BALDWINSVL  | 315 | 303 | MCI WORLD COM COMMUNICATIONS INC. - NY             | Received an assigned block 11/07                                                |
| BALDWINSVL  | 315 | 303 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned 12/03 as an LRN, blocks donated 2/04                                   |
| BALDWINSVL  | 315 | 352 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, blocks donated 3/02                                  |
| BALDWINSVL  | 315 | 352 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received blocks beginning 6/04, 2 assigned to date                              |
| BALDWINSVL  | 315 | 352 | TALK AMERICA INC. - NY                             | Received blocks beginning 10/07, 2 assigned to date                             |
| BALDWINSVL  | 315 | 635 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, all blocks utilized               |
| BALDWINSVL  | 315 | 638 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, all blocks utilized               |
| BALDWINSVL  | 315 | 720 | CELLCO PARTNERSHIP DBA VERIZON WIRELESS - NY       | Received blocks beginning 11/03, 8 assigned to date                             |
| BALDWINSVL  | 315 | 720 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 11/03                                 |
| BALDWINSVL  | 315 | 743 | TELCOVE ATLANTIC, INC. - NY                        | Assigned prior to pooling, blocks donated 4/02                                  |
| BALDWINSVL  | 315 | 753 | PAETEC COMMUNICATIONS, INC. - NY                   | Assigned prior to pooling, blocks donated 10/04                                 |
| BALDWINSVL  | 315 | 857 | CELLCO PARTNERSHIP DBA VERIZON WIRELESS - NY       | Received blocks beginning 5/03, 7 assigned to date                              |
| BALDWINSVL  | 315 | 857 | CHOICE ONE COMMUNICATIONS, INC.                    | Assigned prior to pooling, blocks donated 4/03                                  |
| BELLEVILLE  | 315 | 756 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 5/07, blocks donated 7/07                            |
| BELLEVILLE  | 315 | 846 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                 |
| BOONVILLE   | 315 | 358 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 9/05, blocks donated 11/05                           |
| BOONVILLE   | 315 | 942 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                 |
| BRANCHPORT  | 315 | 305 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 3/08                            |
| BRANCHPORT  | 315 | 595 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                 |
| CAMDEN      | 315 | 245 | ACC NATIONAL TELECOM CORPORATION - NY              | Received an assigned block 4/03                                                 |
| CAMDEN      | 315 | 245 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received blocks beginning 6/04, 2 assigned to date                              |
| CAMDEN      | 315 | 245 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 4/03                                  |
| CAMDEN      | 315 | 820 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned after pooling, 8/05, no blocks available from 245, blocks donated 3/08 |
| CAMILLUS    | 315 | 320 | CHOICE ONE COMMUNICATIONS, INC.                    | Assigned prior to pooling, 3/99, blocks donated 3/02                            |
| CAMILLUS    | 315 | 320 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 4/05                                                 |
| CAMILLUS    | 315 | 407 | CHOICE ONE COMMUNICATIONS, INC.                    | Assigned prior to pooling, 5/01, blocks donated 1/03                            |
| CAMILLUS    | 315 | 407 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received blocks beginning 6/04, 2 assigned to date                              |
| CAMILLUS    | 315 | 545 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 2/00, blocks donated 3/02                            |
| CAMILLUS    | 315 | 545 | NEXTEL COMMUNICATIONS, INC.                        | Received an assigned block, 8/06                                                |
| CAMILLUS    | 315 | 631 | TELCOVE ATLANTIC, INC. - NY                        | Assigned prior to NANPA and prior to pooling, blocks donated 4/02               |
| CAMILLUS    | 315 | 672 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02               |
| CAMILLUS    | 315 | 808 | BROADVIEW NETWORKS, INC. - NY                      | Assigned 9/06 for LRN, blocks donated 11/06                                     |
| CAMILLUS    | 315 | 833 | PAETEC COMMUNICATIONS, INC. - NY                   | Assigned prior to NANPA and prior to pooling, blocks donated 3/02               |
| CANASTOTA   | 315 | 697 | CTC COMMUNICATIONS - NY                            | Received as assigned block 12/04                                                |
| CANASTOTA   | 315 | 697 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 3/02                                  |
| CANASTOTA   | 315 | 875 | ACC NATIONAL TELECOM CORPORATION - NY              | Received an assigned block 6/03                                                 |
| CANASTOTA   | 315 | 875 | CHOICE ONE COMMUNICATIONS, INC.                    | Assigned prior to pooling, blocks donated 3/02                                  |
| CANASTOTA   | 315 | 875 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received as assigned block 6/05                                                 |

| RATE CENTER | NPA | NXX | SERVICE PROVIDER                                   | NOTES*                                                                                  |
|-------------|-----|-----|----------------------------------------------------|-----------------------------------------------------------------------------------------|
| CAPEVINCNT  | 315 | 501 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                                   |
| CAPEVINCNT  | 315 | 654 | TOWNSHIP TELEPHONE CO., INC.                       | Assigned prior to NANPA and prior to pooling, donated blocks in progress                |
| CARTHAGE    | 315 | 493 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, all blocks utilized                                          |
| CARTHAGE    | 315 | 519 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                         |
| CARTHAGE    | 315 | 519 | PAETEC COMMUNICATIONS, INC. - NY                   | Assigned 2/02, no blocks available from 493, blocks donated 3/02                        |
| CARTHAGE    | 315 | 519 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 9/04                                                         |
| CARTHAGE    | 315 | 519 | WESTELCOM NETWORK, INC. - NY                       | Received an assigned block 10/05                                                        |
| CAZENOVIA   | 315 | 655 | WINDSTREAM NEW YORK, INC. - FULTON                 | Assigned prior to pooling, all blocks utilized                                          |
| CAZENOVIA   | 315 | 815 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned 10/04, no blocks available from 655, blocks donated 2/05                       |
| CHAUMONT    | 315 | 300 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 6/07                                    |
| CHAUMONT    | 315 | 649 | TOWNSHIP TELEPHONE CO., INC.                       | Assigned prior to NANPA and prior to pooling, donated blocks in progress                |
| CHITTENNGO  | 315 | 510 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                         |
| CHITTENNGO  | 315 | 510 | PAETEC COMMUNICATIONS, INC. - NY                   | Assigned prior to pooling, blocks donated 3/02                                          |
| CHITTENNGO  | 315 | 510 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 7/05                                                         |
| CHITTENNGO  | 315 | 687 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 3/02                                          |
| CLAYTON     | 315 | 285 | CHOICE ONE COMMUNICATIONS, INC.                    | Assigned prior to pooling, 5/99, blocks donated 6/04                                    |
| CLAYTON     | 315 | 285 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                         |
| CLAYTON     | 315 | 285 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/05                                                         |
| CLAYTON     | 315 | 650 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 6/99, blocks donated 1/03                                    |
| CLAYTON     | 315 | 686 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02                       |
| CLAYTON     | 315 | 686 | WESTELCOM NETWORK, INC. - NY                       | Received an assigned block 6/07                                                         |
| CLAYVILLE   | 315 | 259 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                                    |
| CLAYVILLE   | 315 | 839 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                         |
| CLIFTONSPG  | 315 | 462 | ONTARIO TELEPHONE COMPANY, INC.                    | Assigned prior to pooling; placed in Roch. MSA by PA, donations due 10/07, in progress. |
| CLIFTONSPG  | 315 | 906 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                                   |
| CLYDE       | 315 | 902 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, blocks donated 3/02                                          |
| CLYDE       | 315 | 902 | PAETEC COMMUNICATIONS, INC. - NY                   | Received an assigned block 12/03                                                        |
| CLYDE       | 315 | 902 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 8/06                                                         |
| CLYDE       | 315 | 923 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 3/02                                          |
| CONSTABLV   | 315 | 397 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                         |
| CONSTABLV   | 315 | 912 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 4/07, blocks donated 7/07                                    |
| COPENHAGEN  | 315 | 645 | NEXTEL COMMUNICATIONS, INC.                        | Received an assigned block 12/06                                                        |
| COPENHAGEN  | 315 | 645 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 4/07                                                         |
| COPENHAGEN  | 315 | 645 | USD CLEC, INC. - NY                                | Assigned prior to pooling, blocks donated, date unknown                                 |
| COPENHAGEN  | 315 | 688 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                         |
| COPENHAGEN  | 315 | 688 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated 3/02                                          |
| CROGHAN     | 315 | 301 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 6/07                                    |
| CROGHAN     | 315 | 346 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                         |
| DE RUYTER   | 315 | 852 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated /04                                           |
| DE RUYTER   | 315 | 852 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 7/07                                                         |
| DE RUYTER   | 315 | 864 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned after pooling, no blocks available in 852, blocks donated                      |
| DEXTER      | 315 | 639 | TOWNSHIP TELEPHONE CO., INC.                       | Assigned prior to pooling, donated blocks due 9/07, none received to date               |
| DEXTER      | 315 | 918 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                                   |
| DOLGEVILLE  | 315 | 429 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 9/05                                                         |
| DOLGEVILLE  | 315 | 429 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA, prior to pooling, blocks donated 3/02                          |
| DOLGEVILLE  | 315 | 613 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                         |
| DOLGEVILLE  | 315 | 613 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 6/99, block donated 1/03                                     |
| DOLGEVILLE  | 315 | 669 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 6/00, non-pooled to date                                     |
| EAGLE BAY   | 315 | 357 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                         |
| EAGLE BAY   | 315 | 390 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 4/07, blocks donated 7/07                                    |
| FORESTPORT  | 315 | 392 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                         |
| FORESTPORT  | 315 | 763 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 4/07, blocks donated 7/07                                    |

| RATE CENTER | NPA | NXX | SERVICE PROVIDER                                   | NOTES*                                                                                      |
|-------------|-----|-----|----------------------------------------------------|---------------------------------------------------------------------------------------------|
| GOUVERNEUR  | 315 | 287 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02                           |
| GOUVERNEUR  | 315 | 522 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 12/99, blocks donated 4/08                                       |
| GOUVERNEUR  | 315 | 535 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 12/98, blocks donated, date unknown                              |
| GOUVERNEUR  | 315 | 535 | CTC COMMUNICATIONS - NY                            | Received an assigned block 5/06                                                             |
| GOUVERNEUR  | 315 | 535 | PAETEC COMMUNICATIONS, INC. - NY                   | Received an assigned block 4/01                                                             |
| GOUVERNEUR  | 315 | 535 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/05                                                             |
| GOUVERNEUR  | 315 | 535 | WESTELCOM NETWORK, INC. - NY                       | Received an assigned block 4/04                                                             |
| GOUVERNEUR  | 315 | 582 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 12/98, blocks donated 1/03                                       |
| HARRISVL    | 315 | 512 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 11/06                                                            |
| HARRISVL    | 315 | 512 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 6/99, block donated 1/03                                         |
| HARRISVL    | 315 | 537 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 12/98, blocks donated 3/02                                       |
| HARRISVL    | 315 | 537 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 5/07                                                             |
| HARRISVL    | 315 | 543 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02                           |
| HARRISVL    | 315 | 610 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 6/00, blocks donated 4/08                                        |
| HENDERSON   | 315 | 304 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 6/07                                        |
| HENDERSON   | 315 | 938 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                             |
| HERMON      | 315 | 302 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 3/07, blocks donated 6/07                                        |
| HERMON      | 315 | 347 | EDWARDS TELEPHONE CO., INC.                        | Assigned prior to pooling, donated blocks due 9/07, none received to date                   |
| HOLLD PTNT  | 315 | 206 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                                        |
| HOLLD PTNT  | 315 | 865 | ONEIDA COUNTY RURAL TELEPHONE CO.                  | Assigned prior to pooling, donated blocks due 9/07, none received to date                   |
| LITTLE FLS  | 315 | 508 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 5/99, blocks donated 03                                          |
| LITTLE FLS  | 315 | 508 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                             |
| LITTLE FLS  | 315 | 508 | NEXTEL COMMUNICATIONS, INC.                        | Received an assigned block 8/06                                                             |
| LITTLE FLS  | 315 | 508 | PAETEC COMMUNICATIONS, INC. - NY                   | Received two assigned blocks, beginning 11/03                                               |
| LITTLE FLS  | 315 | 508 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/05                                                             |
| LITTLE FLS  | 315 | 556 | TELCOVE ATLANTIC, INC. - NY                        | Assigned prior to pooling, 7/99, blocks donated 5/02                                        |
| LITTLE FLS  | 315 | 618 | USD CLEC, INC. - NY                                | Assigned prior to NANPA and prior to pooling, blocks donated 1/03                           |
| LITTLE FLS  | 315 | 823 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 11/06                          |
| LOWVILLE    | 315 | 376 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, all blocks utilized                                              |
| LOWVILLE    | 315 | 377 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 7/05                                              |
| LOWVILLE    | 315 | 377 | PAETEC COMMUNICATIONS, INC. - NY                   | Received an assigned block 7/07                                                             |
| LOWVILLE    | 315 | 874 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 5/05, blocks donated 7/05                                        |
| LYONSFALLS  | 315 | 348 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                             |
| LYONSFALLS  | 315 | 513 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                                       |
| MANLIUS     | 315 | 682 | WINDSTREAM NEW YORK, INC. - FULTON                 | Assigned prior to pooling, all blocks utilized                                              |
| MANLIUS     | 315 | 692 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 12/04                                                            |
| MANLIUS     | 315 | 692 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned after pooling, 4/04, no blocks available from 682, blocks donated 6/04             |
| MANNVILLE   | 315 | 465 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                                             |
| MANNVILLE   | 315 | 872 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 5/07, blocks donated 7/07                                        |
| MEXICO      | 315 | 908 | CSTC, LLC - NY                                     | Received an assigned block 10/07                                                            |
| MEXICO      | 315 | 908 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Assigned after pooling, 3/06, no blocks available from 963, blocks donated 12/06            |
| MEXICO      | 315 | 963 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                                             |
| MEXICO      | 315 | 963 | NEXTEL COMMUNICATIONS, INC.                        | Received an assigned block 12/04                                                            |
| MEXICO      | 315 | 963 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/05                                                             |
| MEXICO      | 315 | 963 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, blocks donated, dates unknown                                    |
| NICHOLVL    | 315 | 328 | NICHOLVILLE TELEPHONE CO., INC.                    | Assigned prior to pooling, donated blocks due 9/07, none received to date                   |
| NICHOLVL    | 315 | 674 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 4/07, blocks donated 7/07                                        |
| ORISKANYFLS | 315 | 306 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned after pooling, 3/07, blocks donated 6/07                                           |
| ORISKANYFLS | 315 | 821 | ORISKANY FALLS TELEPHONE CORP.                     | Assigned prior to pooling, pooling due 9/04, blocks available but not donated, in progress. |
| PHELPS      | 315 | 318 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                                       |
| PHELPS      | 315 | 548 | ONTARIO TELEPHONE COMPANY, INC.                    | Assigned prior to pooling; placed in Roch. MSA by PA, donations due 9/07, in progress.      |
| PHOENIX     | 315 | 695 | WINDSTREAM NEW YORK, INC. - FULTON                 | Assigned prior to pooling, all blocks utilized                                              |

| RATE CENTER | NPA | NXX | SERVICE PROVIDER                                   | NOTES*                                                                    |
|-------------|-----|-----|----------------------------------------------------|---------------------------------------------------------------------------|
| PHOENIX     | 315 | 934 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned 8/05, no blocks available from 695, blocks donated 10/05         |
| POPLAR RDG  | 315 | 364 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 6/04                                           |
| POPLAR RDG  | 315 | 364 | VERIZON NEW YORK, INC.                             | Assigned prior to pooling, block donated 3/02                             |
| POPLAR RDG  | 315 | 563 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, blocks donated 3/02                            |
| POPLAR RDG  | 315 | 563 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 6/07                                           |
| PULASKI     | 315 | 298 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, 1 block donated 4/06, rest utilized            |
| PULASKI     | 315 | 509 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned 9/05, no blocks available in 298, blocks donated 11/05           |
| REMSEN      | 315 | 205 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                      |
| REMSEN      | 315 | 831 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                           |
| SODUS       | 315 | 483 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, all blocks utilized         |
| SODUS       | 315 | 553 | PAETEC COMMUNICATIONS, INC. - NY                   | Received an assigned block 11/05                                          |
| SODUS       | 315 | 553 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 10/04                                          |
| SODUS       | 315 | 553 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 6/99, blocks donated, dates unknown            |
| SODUS       | 315 | 812 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 6/00, blocks donated 4/08                      |
| STAR LAKE   | 315 | 309 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to pooling, 2/99, blocks donated 3/02                      |
| STAR LAKE   | 315 | 309 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received an assigned block 11/06                                          |
| STAR LAKE   | 315 | 609 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 6/00, blocks donated 4/08                      |
| STAR LAKE   | 315 | 616 | USD CLEC, INC. - NY                                | Assigned prior to NANPA and prior to pooling, blocks donated 1/03         |
| STAR LAKE   | 315 | 848 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| TULLY       | 315 | 238 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| TULLY       | 315 | 238 | LEVEL 3 COMMUNICATIONS, LLC - NY                   | Received two assigned blocks, beginning 6/04                              |
| TULLY       | 315 | 238 | NEXTEL COMMUNICATIONS, INC.                        | Received an assigned block 9/06                                           |
| TULLY       | 315 | 696 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| TULLY       | 315 | 810 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned 3/05 as an LRN, blocks donated 5/05                              |
| VERNON      | 315 | 829 | VERNON TELEPHONE CO., INC.                         | Assigned prior to pooling, blocks due 9/07, in progress                   |
| VERNON      | 315 | 953 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 8/06, blocks donated 11/06                     |
| VERNON      | 315 | 953 | CSTC, LLC - NY                                     | Received an assigned block, 10/07                                         |
| W WINFIELD  | 315 | 204 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                      |
| W WINFIELD  | 315 | 822 | WINDSTREAM NEW YORK, INC. - FULTON                 | Assigned prior to pooling, blocks donated 9/07                            |
| WATERVILLE  | 315 | 202 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                      |
| WATERVILLE  | 315 | 841 | CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY | Assigned prior to pooling, blocks donated 11/07                           |
| WESTERNVL   | 315 | 827 | ONEIDA COUNTY RURAL TELEPHONE CO.                  | Assigned prior to pooling, donated blocks due 9/07, none received to date |
| WESTERNVL   | 315 | 851 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 4/07, blocks donated 4/08                      |
| WILLIAMSON  | 315 | 589 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| WILLIAMSON  | 315 | 904 | ACC NAT. TELECOM CORP. - NY                        | Assigned prior to pooling, blocks donated 3/02                            |
| WILLIAMSON  | 315 | 904 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 10/04                                          |
| WINTHROP    | 315 | 208 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Assigned prior to pooling, 1/07, blocks donated 4/07                      |
| WINTHROP    | 315 | 389 | NICHOLVILLE TELEPHONE CO., INC.                    | Assigned prior to pooling, donated blocks due 9/07, none received to date |
| WOLCOTT     | 315 | 293 | USD CLEC, INC. - NY                                | Assigned prior to pooling, 6/99, blocks donated 1/03                      |
| WOLCOTT     | 315 | 594 | VERIZON NEW YORK, INC.                             | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| WOLCOTT     | 315 | 660 | NORTHLAND NETWORKS                                 | Assigned prior to pooling, 6/00, no blocks donated to date                |
| WOLCOTT     | 315 | 905 | ACC NATIONAL TELECOM CORPORATION - NY              | Assigned prior to NANPA and prior to pooling, blocks donated 3/02         |
| WOLCOTT     | 315 | 905 | SPRINT COMMUNICATIONS COMPANY, L.P. - NY           | Received an assigned block 9/05                                           |

\*Where available, dates are indicated for codes assigned in rate centers noted on PULP's Attachment B.