

**Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, Pennsylvania 17120**

NeuStar, Inc., in its role as North American )  
Numbering Plan Administrator )  
 ) Docket No. \_\_\_\_\_  
Petition for Approval of Numbering Plan )  
Area Relief Planning for the 717 NPA )

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

1. NeuStar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Pennsylvania under the North American Numbering Plan and on behalf of the Pennsylvania telecommunications industry (“Industry”),<sup>1</sup> petitions the Pennsylvania Public Utility Commission (“Commission”)<sup>2</sup> to approve the Industry’s consensus decision<sup>3</sup> to recommend to the Commission an all services distributed overlay of the 717 numbering plan area (“NPA”) as the preferred method for relief for the 717 NPA.<sup>4</sup> The Industry submits its recommendation to the Commission based upon NANPA’s projections that absent NPA relief, the supply of central office codes (often referred to as “CO” or “NXX” codes)

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<sup>1</sup> The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 717 area code of Pennsylvania.

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

<sup>3</sup> Consensus as used in this document means: 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. ATIS Operating Procedures, section 7.1, version 5.2, February 22, 2012.

<sup>4</sup> As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

for the 717 NPA will exhaust during the third quarter of 2018. In order to allow sufficient time for implementation of the selected relief plan prior to exhaust of CO codes in the 717 NPA, the Industry recommends that the Commission approve its recommended 13-month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

## **I. BACKGROUND**

2. The April NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis April 2015 Update (“2015 NRUF Report”) indicates that the 717 NPA will exhaust during the third quarter of 2018.<sup>5</sup> Based upon the projected exhaust, NANPA notified the Commission and the Industry on July 7, 2015 that NPA relief needed to be addressed.<sup>6</sup> The Industry met via conference call on September 15, 2015 to discuss various relief alternatives.<sup>7</sup> Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.<sup>8</sup> The IPD contains descriptions, maps, general facts and assumptions, and the projected lives of an all-services distributed overlay relief alternative, referred to in the IPD as Alternative #1, and one two-way geographic split alternative, referred to as Alternative #2. No other alternatives were proposed.<sup>9</sup>

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<sup>5</sup> NRUF and NPA Exhaust Analysis April 2015 Update (“2015 NRUF Report”).

<sup>6</sup> In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS – 0300061, September 5, 2014) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org>.

<sup>7</sup> A copy of the September 15 meeting minutes, including a list of attendees, is attached as Exhibit A.

<sup>8</sup> A copy of the IPD is included in Exhibit B.

<sup>9</sup> Additional relief alternatives can be proposed at any time during the relief planning process including the initial relief planning meeting.

3. During the relief planning meeting, the Industry members evaluated the relief alternatives, described more fully below:

- Alternative #1 – All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 717 NPA. Alternative #1 has a projected life of 67 years.
- Alternative #2 – Two-Way Geographic Split: In a two-way geographic split, the exhausting NPA is split into two geographic areas and a new NPA is assigned to one of the areas formed by the split. For Alternative #2, the proposed split boundary line runs along rate center boundaries in a west-to-east direction. The boundary line runs north of Dry Run, Chambersburg, Fayetteville, Biglerville, York Springs, Dillsburg, Dover, Manchester, Elizabethtown, Manheim, Lititz, Ephrata and Denver. The northern portion, Area A, would have a projected NPA life of 71 years to exhaust and the southern portion, Area B, would have a projected NPA life of 62 years to exhaust.

4. At the September 15 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay plan, as the preferred method of relief for the 717 NPA.<sup>10</sup>

## **II. DESCRIPTION OF THE RECOMMENDED ALL SERVICES DISTRIBUTED OVERLAY**

5. Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 717 NPA. All existing customers would retain the 717 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all calls within and between the 717

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<sup>10</sup> For a listing of the pros and cons of each alternative as discussed by the Industry members at the September 15, 2015 meeting, see pages 5-8 of Exhibit A.

NPA and the new NPA.<sup>11</sup> The industry recommends that all local and toll calls between the 717 NPA and the new NPA be dialed as 10-digits, or permissively as 1+10 digits at each service provider's discretion. All local and toll calls originating in the 717 NPA or the new NPA and terminating in other NPAs (NPAs other than the 717 or new NPA) must be dialed as 1 +10 digits. Operator services calls would require customers to dial 0+10 digits. The following table illustrates the recommended dialing plan:

**Recommended Overlay Dialing Plan for All Services Distributed Overlay**

<b>Type of Call</b>	<b>Call Terminating in</b>	<b>Dialing Plan</b>
Local & Toll Calls	Overlay Home NPAs (HNPA)	10 digits (NPA-NXX-XXXX)*
Local & Toll Calls	Foreign NPA (FNPA) outside of overlay	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

\*1+10 digit dialing for all calls permissible at each service provider's discretion.

When the 717 NPA exhausts, all CO code assignments will be made from the new overlay area code.

6. Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementation of the overlay. The recommended schedule is as follows:

**Recommended Implementation Schedule for All Services Distributed Overlay**

<b>EVENT</b>	<b>TIMEFRAME</b>
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 717 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 start of Mandatory Dialing Period)
Total Implementation Interval	13 months

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<sup>11</sup> 47 C.F.R. §52.19(c)(3)(ii).

Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

### III. CONCLUSION

7. The Industry has determined the need to initiate relief efforts for the 717 NPA in Pennsylvania to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving the Industry's recommended relief method for the 717 NPA, an all services distributed overlay. The Industry also requests that the order approve the Industry recommended 13-month relief implementation schedule.

Respectfully submitted,



Kimberly Wheeler Miller

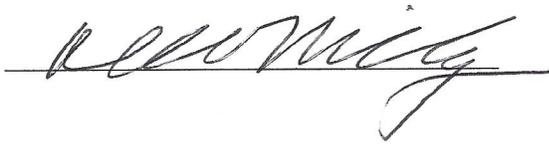
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October 23, 2015

## VERIFICATION

I, Wayne Milby, hereby state that the facts in the foregoing Petition of the North American Numbering Plan Administrator on behalf of the Pennsylvania Telecommunications Industry for Approval of Numbering Plan Area Relief Planning for the 717 NPA are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in cursive script, appearing to read "Wayne Milby", is written over a horizontal line.

Date: October 23, 2015

# **EXHIBIT A**

**PENNSYLVANIA – 717 NPA  
INITIAL RELIEF PLANNING MEETING  
VIA CONFERENCE CALL  
FINAL MINUTES  
September 15, 2015**

**WELCOME, INTRODUCTIONS & AGENDA REVIEW**

Wayne Milby, Senior NPA Relief Planner – NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment 1. Wayne mentioned there would be a quality survey sent via email to those attending today's call. Wayne then reviewed the agenda and NANPA's role and responsibilities.

**NANPA's ROLE AND RESPONSIBILITIES**

Wayne reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA. (The April 2015 NRUF projects the 717 NPA will exhaust 3Q2018.)
- Facilitate a Pre-IPD conference call with the industry six weeks prior to the NPA Relief Planning meeting.
- Distribute the Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting.
- Review the relief alternatives presented in the IPD
- Check to see if there are any additional relief alternatives from the participants
- Discuss the alternatives and list some pros and cons for each alternative
- Then, through a process of elimination of all but one alternative, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the Pennsylvania Public Utility Commission (PUC).
- Also determine any additional items to include in a filing with the PUC such as dialing plan and implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry reaches consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting or the date set by the Industry.

**REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES**

Wayne stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Wayne 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.

Wayne referred the participants to the three relief planning meeting aids included in the IPD document: the Excerpts from the INC NPA Relief Planning Guidelines, the collection of Pros and Cons of relief alternatives chart, and the Implementation Interval and Dialing Plan charts. These meeting aids will assist the participants in their decision making process and to make a recommendation for relief.

Wayne reviewed the most pertinent items from the Industry Numbering Committee (INC) NPA Code Relief and Planning and Notification Guidelines for this meeting as follows:

- The NPA Relief Planning, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: ([www.atis.org/inc/incguides.asp](http://www.atis.org/inc/incguides.asp)).
- The most pertinent items in the guidelines concerning this meeting are the relief options/alternatives shall cover a period of five years beyond the forecasted exhaust of the existing area code.
- If there is a split, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.
- The guidelines also state for split alternatives, that a difference in NPA lifetimes of more than 10 years shall be avoided.

#### **STATUS OF PENNSYLVANIA 717 NPA**

Beth Sprague, NANPA, reviewed the status of the 717 NPA, which reflects a total of 735 NXX codes currently assigned. As of September 15, 2015, 45 NXX codes remain available for assignment in the 717 NPA, while 20 additional NXX codes are classified as unavailable (See Attachment 2). Also the April 2015 Number Resource Utilization Forecast (NRUF) projects exhaust of the 717 NPA during the third quarter 2018.

The annual NXX code assignment history in the 717 NPA has been as follows:

2012 assignments: 13 codes

2013 assignments: 10 codes

2014 assignments: 15 codes

2015 assignments year to date: 12 codes

#### **STATUS OF ONE-THOUSAND-BLOCK POOLING PA 717 NPA**

Cecilia McCabe, NeuStar Number Pooling Implementation Manager, stated number pooling started in the 717 NPA on March 14, 2002. Out of the 107 rate centers, there are 105 rate centers that are mandatory pooling, 2 mandatory-single service provider rate centers, 0 rate centers that are optional pooling and 0 rate centers are excluded from pooling. There have been 328 blocks assigned in the last 12 months and 831 blocks are available as of September 14, 2015. Pooling has assigned 21 codes in the last twelve months; 17 for pool replenishment, 0 for dedicated customers and 4 for LRNs. The forecasted need for codes for the next twelve months is 7 codes for pool replenishment

and dedicated customers and 0 for LRNs. (See attachment 3).

**PRE-IPD CONFERENCE CALL RE-CAP**

Wayne provided a recap of the pre-IPD conference call held July 22, 2015. The purpose of this pre-IPD call was to solicit industry input on the proposed relief plans and to discuss additional alternative relief plans for consideration prior to the issue of the IPD. No additional relief alternatives were suggested during the meeting. Informal meeting notes resulting from the pre-IPD industry conference were posted to NANPA's NAS-NNS service on July 23, 2015. Wayne noted the main purpose of that call was to obtain additional relief alternatives for consideration and he stated the industry will still have the opportunity to propose additional relief alternatives during the call today.

**REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 717 NPA**

Wayne reviewed the Initial Planning Document (IPD) distributed prior to the meeting.

**General Facts:**

On July 1, 2014 the population of Pennsylvania was 12,787,209 compared to a population of 12,281,052 on April 1, 2000. Pennsylvania encompasses an area of 44,817 square miles and is bordered by New York on the north, New Jersey on the east, Maryland and West Virginia on the south and Ohio on the west. The state flower is the Mountain Laurel and the state bird is the Ruffed Grouse.

Pennsylvania currently has 11 active NPAs. Codes were first assigned in the 10<sup>th</sup> NPA, 878, during 2013 upon exhaust of codes in either the 412 or 724 NPA and codes were first assigned in the 272 NPA during 2014 upon exhaust of codes in the 570 NPA. The 717 NPA was created in January 1947. The 717 NPA covers the south-central portion of the Commonwealth of Pennsylvania. The Susquehanna River is almost a mile wide as it passes by the State Capitol in Harrisburg, Pennsylvania. The river flows from North to South through the entire 717 NPA entering the Chesapeake Bay at Harve de Grace, MD. It is the longest river lying entirely within the United States that drains into the Chesapeake Bay, providing half of the freshwater inflow for the entire Bay. The 717 NPA also includes Lancaster County, known as *the Garden Spot of America*. Lancaster is a popular tourist attraction due mostly to the Amish or Pennsylvania Dutch residents.

Wayne then briefly reviewed Appendix E to the NPA Code Relief Planning Guidelines which provides the General Attributes of Common Relief Alternatives.

The following maps and related documents were then reviewed:

Map showing location of all NPAs in Pennsylvania

NPA 717 County Map

NPA 717 table of the population of each County in the 717 NPA with the percentage change in population from 2010 to 2014

NPA 717 Rate Centers & Cities with a Population > 10 K Map

NPA 717 Rate Center & Highway Map

NPA 717 Rate Center Map

NPA 717 Rate Center & County Map of the 107 rate centers

NPA 717 Rate Center & LATA Map

Rate Center Table

Code Holder Table

Wayne stated that with the IPD includes an all services distributed overlay (Alternative #1) and one NPA split (Alternatives #2). He reviewed them as follows:

<b>OVERLAY ALTERNATIVE</b>
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**ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY**

A new NPA code would be assigned to the same geographic area occupied by the existing 717 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 717 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 726

Total rate centers = 107

Area Code Life in Years = 67

<b>NPA SPLIT ALTERNATIVE</b>
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The exhausting NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

**ALTERNATIVE #2 – NPA SPLIT**

The proposed split boundary line runs along rate center boundaries in a west-to-east direction. The boundary line runs north of Dry Run, Chambersburg, Fayetteville, Biglerville, York Springs, Dillsburg, Dover, Manchester, Elizabethtown, Manheim, Lititz, Ephrata and Denver.

**AREA “A”**

Total CO Codes = 349  
 Total rate centers = 48  
 Area Code Life in Years = 71

**AREA “B”**

Total CO Codes = 377  
 Total rate centers = 59  
 Area Code Life in Years = 62

<b>INDUSTRY RECOMMENDED ALTERNATIVES</b>
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Wayne asked the industry participants if there were additional suggestions for relief alternatives. There were no additional alternatives proposed during the relief planning meeting.

**DISCUSSION OF PROS AND CONS OF RELIEF ALTERNATIVES**

A general discussion ensued regarding the Pros and Cons of each relief alternative and the industry agreed to the following:

**Overlay Pros and Cons:**

Pros:

Alternative #					
				1	
			X	1	All existing customers would retain the 717 area code and would not have to change their telephone numbers.
			X	2	Does not discriminate against customers on different sides of a boundary line as does a geographic split
			X	3	Less customer confusion and easier education process
			X	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.
			X	5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.

				X	6 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth
				X	7 No need for synchronization of old and new NPAs in NPAC databases
				X	8 Easier for service providers to implement from a translations, billing and service order system perspective
				X	9 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
				X	10 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
				X	11 Does not split cities or counties into different area codes.
				X	12 Keeps communities of interest in tact.
				X	13 No impact on some wireless carriers that have to reprogram handsets manually
				X	14 No technical impacts to number portability, text messaging or multimedia messaging
				X	15 Helps move customers toward universal 10-digit dialing, recognizing the inevitable move of technology towards an internet protocol network, which requires 10-digit dialing.

**Overlay Pros and Cons:**

Cons:

Alternative #					
				1	
				X	1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 717 NPA and the new NPA.
				X	2 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.

**NPA Split Pros and Cons**

Pros:

Alternative #					
				2	
				X	1 Maintains seven digit dialing for local calls within the same NPA
				X	2 Approximately 1/2 of customers would experience no change if they keep the XXX NPA

**NPA Split Pros and Cons:**

Cons:

Alternative #				
			2	
		X		1 Requires approximately ½ of 717 NPA customers to change their telephone numbers thus creating winners and losers.
		X		2 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
		X		3 Difficult PSC/PUC decision on which side retains the old NPA.
		X		4 Longer time period needed for service providers to implement this type of relief.
		X		5 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
		X		6 More complicated and costly to implement for service providers in their billing, translations and database systems.
		X		7 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
		X		8 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
		X		9 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
		X		10 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
		X		11 Split requires significant challenges to service provider's operational support systems and network elements.
		X		12 Splits cause customer confusion with caller ID during implementation.
		X		13 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
		X		14 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
		X		15 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
		X		16 Splits require the 800/SMS database to be updated.

			X		17 Splits reduce the geographic area served by one area code.
			X		18 Splits the city(s), counties or legislative districts into different area codes.
			X		19 Splits communities of interest.
			X		20 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

**CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES**

After discussion and review of the above listed Pros and Cons, proposals were made and consensus reached to eliminate Alternative # 2 due to cons listed above.

**CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION**

After further discussion, a proposal was made and consensus was reached to recommend Alternative #1, the all services distributed overlay alternative, to the Pennsylvania Public Utility Commission as the industry’s preferred method of relief for the 717 NPA.

**CONSENSUS ON DIALING PLAN (ALTERNATIVE #1)**

Consensus was reached to recommend the following dialing plan for Alternative #1:

**Recommended Overlay Dialing Plan for All Services Distributed Overlay**

Type of Call	Call Terminating in	Dialing Plan
Local & Toll Calls	Overlay Home NPAs (HNPA)	10 digits (NPA-NXX-XXXX)*
Local & Toll Calls	Foreign NPA (FNPA) outside of overlay	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

\*1+10 digit dialing for all calls permissible at each service provider’s discretion.

**CONSENSUS ON IMPLEMENTATION INTERVALS**

A recommendation was made and consensus reached to recommend to the Commission a 13-month schedule for implementation of the overlay.

The recommended schedule is as follows:

**OVERLAY IMPLEMENTATION SCHEDULE FOR ALTERNATIVE #1**

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period	6 months

<i>(Calls within 717 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing begins at the end of the Permissive Dialing Period	
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after start of Mandatory Dialing)
Total Implementation Interval	13 months

**STATEMENTS FOR THE RECORD**

No statements for the record were submitted.

**NANPA FILING INDUSTRY EFFORTS WITH PUC**

Consensus was reached that NANPA will prepare a draft of the petition that will be filed with the Pennsylvania Public Utility Commission (“PUC”) informing them of the outcome of this relief meeting. The draft filing will be reviewed by the industry on the conference call that will be held to approve these minutes. The INC guidelines reflect the relief petition is to be filed with the regulator within 6 weeks of the initial relief planning meeting unless otherwise agreed.

**REVIEW OF DRAFT MEETING MINUTES & PUC FILING**

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by September 29, 2015 and the draft commission filing distributed to the industry by October 6, 2015. Consensus was also reached to conduct a conference call on October 13, 2015 to review and approve the draft minutes and draft filing to the PUC.

*During the call to approve the draft minutes, consensus was reached to file the petition with the PA PUC no later than October 27, 2015 unless additional steps are required by the PA PUC for NANPA to file the petition.*

Details of the call are as follows:

**Date: October 13, 2015**  
**Time: 4:00 PM ET; 3:00 PM CT; 2:00 PM MT; 1:00 PM PT**  
**Dial-in number: 630-827-6799**  
**Pass code: 8831535#**

Adjourned

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**PENNSYLVANIA – 717 NPA  
RELIEF PLANNING IPD MEETING  
Draft Meeting Attendees  
September 15, 2015**

**PARTICIPANTS**

NAME	COMPANY
George Guerra	AT&T
Margaret Cox	CenturyLink
Rita Schmitz	CenturyLink
Fred Mahle	Frontier
Jim Warta	Frontier
Chris Hepburn	PA PUC
Deb Sagerer	PA PUC
Bryan Mahla	PA PUC
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA
Cecilia McCabe	Neustar Pooling Implementation
Linda Hymans	Neustar Pooling Regulatory
Diane Peters	Level 3
Shaunna Forshee	Sprint
Karen Riepenkroger	Sprint
Nicole Febles	T-Mobile
Kathy Bonette	Verizon
Jena Downs	Verizon
Yun Lee	Verizon Business
Dana Crandall	Verizon Wireless
Elizabeth Ward	Verizon Wireless

Pennsylvania  
NPA 717 NXX Summary  
Data as of August 31, 2015

<b><u>NPA</u></b>	<b><u>717</u></b>					
Assigned NXXs	735					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	20	See Note				
Available NXXs	45					
Total	800					
<b><u>Codes Assigned NPA 717</u></b>	<u>Jan-12</u>	<u>Feb-12</u>	<u>Mar-12</u>	<u>Apr-12</u>	<u>May-12</u>	<u>Jun-12</u>
	0	0	1	0	0	2
	<u>Jul-12</u>	<u>Aug-12</u>	<u>Sep-12</u>	<u>Oct-12</u>	<u>Nov-12</u>	<u>Dec-12</u>
	3	4	1	1	0	1
	<u>Jan-13</u>	<u>Feb-13</u>	<u>Mar-13</u>	<u>Apr-13</u>	<u>May-13</u>	<u>Jun-13</u>
	1	0	1	0	3	1
	<u>Jul-13</u>	<u>Aug-13</u>	<u>Sep-13</u>	<u>Oct-13</u>	<u>Nov-13</u>	<u>Dec-13</u>
	0	1	2	0	0	1
	<u>Jan-14</u>	<u>Feb-14</u>	<u>Mar-14</u>	<u>Apr-14</u>	<u>May-14</u>	<u>Jun-14</u>
	2	0	0	2	0	0
	<u>Jul-14</u>	<u>Aug-14</u>	<u>Sep-14</u>	<u>Oct-14</u>	<u>Nov-14</u>	<u>Dec-14</u>
	1	1	3	1	2	3
	<u>Jan-15</u>	<u>Feb-15</u>	<u>Mar-15</u>	<u>Apr-15</u>	<u>May-15</u>	<u>Jun-15</u>
	4	0	0	1	0	1
	<u>Jul-15</u>	<u>Aug-15</u>	<u>Sep-15</u>			
	0	6	0*			
*As of August 31, 2015						
<b>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).</b>						

<b>POOLING STATISTICS</b>	
<i>Provided By: Cecilia McCabe</i>	
<b>ST/NPA:</b>	<b>PA 717</b>
<b>MEETING DATE:</b>	<b>9/15/2015</b>
<b>MEETING SUBJECT:</b>	
<i>Relief Planning</i>	<b>X</b>
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
<b>POOL START DATE (PSD)</b>	<b>3/14/2002</b>
<b>RATE CENTERS</b>	
<i># Total</i>	<b>107</b>
<i># Mandatory</i>	<b>105</b>
<i># Mandatory-Single Service Providers (M*)</i>	<b>2</b>
<i># Optional</i>	<b>0</b>
<i># Excluded</i>	<b>0</b>
<b>BLOCKS ASSIGNED</b>	
<i># Total</i>	<b>328</b>
<i>(For time period 09/01/14 - 9/14/15)</i>	
<b>BLOCKS AVAILABLE</b>	
<i>#Total</i>	<b>831</b>
<i>(As of preparation date: 9/14/15)</i>	
<b>CODES ASSIGNED</b>	
<i># Total</i>	<b>21</b>
<i># for Pool Replenishment</i>	<b>17</b>
<i># for Dedicated Customers</i>	<b>0</b>
<i># for LRNs</i>	<b>4</b>
<i>(For time period 09/01/14 - 9/14/15)</i>	
<b>CODES FORECASTED</b>	
<i># Total</i>	<b>7</b>
<i># for Pool Replenishment and Dedicated Customers</i>	<b>7</b>
<i># for LRNs</i>	<b>0</b>
<i>(For the next twelve months as of 9/14/15)</i>	

# **EXHIBIT B**

September 8, 2015

To: Pennsylvania 717 Service Providers and Interested Industry Members

Re: Reminder Notice-Initial Planning Document to Plan Relief for the 717 NPA in Pennsylvania

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This is a reminder that on September 15, 2015 NANPA has scheduled an industry NPA relief planning conference call to develop relief plans for the 717 NPA in Pennsylvania. Enclosed is the Initial Planning Document (IPD) for your review prior to the September 15, 2015 scheduled industry NPA Relief Planning conference call meeting.

As stated in our memo dated July 7, 2015 the April 2015 Number Resource Utilization Forecast (NRUF) projects the 717 NPA in Pennsylvania will exhaust during the 3Q2018.

Accordingly, on September 15, 2015 NANPA will convene an industry NPA relief planning conference call to develop a recommended relief plan for the 717 NPA. The objective of this meeting is to secure consensus among members of the Pennsylvania Telecommunications Industry on a single plan for relief of the 717 NPA. The resulting relief plan will be filed with the Pennsylvania Public Utility Commission for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (ATIS) will be applied in the decision-making efforts (See attached copy).

Because the resulting impacts of NPA relief planning are so significant, NANPA strongly encourages your participation at the September 15, 2015 meeting. Past experience demonstrates that this could be the only meeting of the Industry before a decision is reached on a recommended relief plan. The details of the September meeting are as follows:

**Date: September 15, 2015**

**Time: 2:00 PM ET; 1:00 PM CT; 12:00 PM MT; 11:00 AM PT**

**Dial-in number: (630) 827-6799 Pass code: 8831535#**

**NANPA is also making an online capability available for this meeting. To join the online of the reference documents during the call please utilize the link and instructions below:**

[https://urldefense.proofpoint.com/v2/url?u=https-3A\\_neustar.webex.com\\_neustar\\_j.php-3FMTID-3Dm0e2b4c5024bd817b7aacb25f03197638&d=AwMGaQ&c=MOptNIVtIETeDALC\\_IULrw&r=O6ub6WcNvHcqR8QyH34bdMaow0\\_qxONlcs mouaSKj8g&m=tuMztrMfnMZagK9rGRkf2-XkvPoa9pTjwdnUmzmYTEI&s=qidw5hE5-qyF5grk1GSVqec-KfpUcMikesYZQMEAliM&e=](https://urldefense.proofpoint.com/v2/url?u=https-3A_neustar.webex.com_neustar_j.php-3FMTID-3Dm0e2b4c5024bd817b7aacb25f03197638&d=AwMGaQ&c=MOptNIVtIETeDALC_IULrw&r=O6ub6WcNvHcqR8QyH34bdMaow0_qxONlcs mouaSKj8g&m=tuMztrMfnMZagK9rGRkf2-XkvPoa9pTjwdnUmzmYTEI&s=qidw5hE5-qyF5grk1GSVqec-KfpUcMikesYZQMEAliM&e=)

**Meeting number: 624 140 072**

**Meeting password: 717**

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you received this notice from someone else, and would like to receive additional information in the future about the 717 relief, you are encouraged to sign up to NANPA's NAS-NNS by going to [www.nanpa.com](http://www.nanpa.com), then selecting NAS Login and then selecting New Registration and following the sign-up process.

**If you plan on attending the NPA Relief Planning conference call on September 15, 2015 please let me know by sending an email to [wayne.milby@neustar.biz](mailto:wayne.milby@neustar.biz).** This will help us to determine if all industry parties will be represented at the 717 NPA meeting.

Please feel free to contact me if you have any questions regarding the above relief planning conference call, any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on 804-795-5919 or via email at the address above.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Wayne Milby". The signature is fluid and cursive, with a small dot above the letter 'i' in "Milby".

D. Wayne Milby  
Senior NPA Relief Planner – NANPA  
e-mail: [wayne.milby@neustar.biz](mailto:wayne.milby@neustar.biz)

CC: Chris Hepburn – PA PUC Staff  
Deb Sagerer – PA PUC Staff  
David Screven – PA PUC Staff  
Bryan Mahla – PA PUC Staff

Attachments

**PENNSYLVANIA - NPA 717  
INITIAL RELIEF PLANNING MEETING  
VIA CONFERENCE CALL  
Dial-In Number: 630-827-6799, Pass code 8831535#**

**SEPTEMBER 15, 2015  
2:00 PM – 4:30 PM (ET)**

**AGENDA**

- 2:00**      **Welcome & Introductions**  
**NANPA's Role & Responsibilities**  
**Minutes & Statements for the Record**  
**Industry Guidelines/Relief Alternatives**  
**Review Code Assignment History**  
**Re-cap Pre-IPD Conference Call**  
**Review Initial Planning Document**  
**Additional Relief Alternatives**
- 3:00**      **Break**
- 3:15**      **Identify Pros & Cons of Alternatives**  
**Elimination of Alternatives**  
**Consensus on Recommended Relief Alternative**  
**Consensus on Dialing Plan**  
**Consensus on Implementation Intervals**  
**Statements for the Record**  
**Consensus on NANPA Filing Industry Efforts with**  
**Pennsylvania PUC**
- Set Date for Conference Call to Review Meeting Notes**  
**and Draft Petition**
- 4:30**      **Adjourn**

# INDUSTRY CONSENSUS PROCESS

2/22/2012

ATIS OPERATING PROCEDURES

VERSION 5.2

## 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.

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 committee and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.



**POOLING STATISTICS***Provided By: Cecilia McCabe*

ST/NPA:	PA 717
MEETING DATE:	9/15/2015
MEETING SUBJECT:	
	<i>Relief Planning</i> X
	<i>Jeopardy</i>
	<i>Jeopardy Status Review</i>
	<i>UA NXXs</i>
	<i>Other</i>
POOL START DATE (PSD)	3/14/2002
RATE CENTERS	
	<i># Total</i> 107
	<i># Mandatory</i> 105
	<i># Mandatory-Single Service Providers (M*)</i> 2
	<i># Optional</i> 0
	<i># Excluded</i> 0
BLOCKS ASSIGNED	
	<i># Total</i> 326
	<i>(For time period 09/01/14 - 8/10/15)</i>
BLOCKS AVAILABLE	
	<i>#Total</i> 803
	<i>(As of preparation date: 8/10/15)</i>
CODES ASSIGNED	
	<i># Total</i> 16
	<i># for Pool Replenishment</i> 12
	<i># for Dedicated Customers</i> 0
	<i># for LRNs</i> 4
	<i>(For time period 09/01/14 - 8/10/15)</i>
CODES FORECASTED	
	<i># Total</i> 17
	<i># for Pool Replenishment and Dedicated Customers</i> 17
	<i># for LRNs</i> 0
	<i>(For the next twelve months as of 8/10/15)</i>

## Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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*This meeting aid is prepared to assist the participants in understanding basic steps and considerations in NPA Relief Planning and the criteria established to determine if relief alternatives are viable.*

### Section:

2.6 The ATIS consensus process will be employed in selecting an industry relief recommendation to ensure that the plan that does not favor a particular interest group.

2.12 Once there is an approved relief plan, all code holders, block holders, and the Pooling Administrator (PA) in the exhausting NPA shall take the appropriate steps to facilitate the implementation of the plan.

### Section:

#### 5.0 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:

Sub -A - The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.

Sub -E - For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

Sub -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. 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.<sup>1</sup>

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<sup>1</sup> Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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Sub –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.<sup>2</sup> 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 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. 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 months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split,**

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

## Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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the end of the recorded announcement period should be at least six months prior to the earliest likely exhaust date.

- 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, local dialing plans using 7-digits or 10-digits, and if available the number of subscribers requiring number changes should be made at this point. Any known technical and operational impacts should also be identified by service providers including items such as required switch replacements and support system modifications.
- 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 letter notifying 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 weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives.
- 5.5 Conduct Industry Meetings 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. When a 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 meeting manageable, participants on the bridge will not be accorded special consideration<sup>3</sup>. NANPA will moderate these meetings or conference calls and will be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and must be considered in these discussions. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

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<sup>3</sup> 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.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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In discussing the alternatives, issues such as new NPA boundaries, local calling areas, protected codes, regulatory issues, customer education, 911 issues, and the length of any necessary permissive dialing period should be considered.

All meetings and/or conference calls should be fully documented in meeting minutes, which are to be made available to the local industry within two weeks after the meeting/conference call and no less than one week prior to a subsequent meeting or call unless otherwise agreed. Copies of meeting minutes may also be forwarded to the appropriate regulatory body.

5.6 **Notify Appropriate Regulatory Body** - When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory body (or bodies) the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.

5.6.1 **Where NPA relief is required for an existing overlay complex, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.** NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

**NANPA shall notify all affected parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft petition.** During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

## Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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5.6.2 Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all affected parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g. an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local<sup>4</sup> and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.7 Approval by Appropriate Regulatory Body – When the regulator issues an order for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not

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<sup>4</sup> As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

## Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.

5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA
- and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating new NPA boundaries and new dialing procedures (if any).

5.9 Industry NPA Relief Implementation Meeting - NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan. [NANPA, on their own initiative or using input from Service Providers, has the option to convene a face-to-face meeting if the chosen plan presents unusual implementation factors.] The meeting shall occur no more than 45 days following the assignment of a new NPA. The agenda for the industry implementation meeting should include relevant dates, milestones, customer education, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.

5.10 Planning Letter – NANPA shall post a Planning Letter to its website informing the public and the industry of pending NPA relief no more than three weeks after the initial implementation meeting. If regulatory approval of the implementation plan with interval dates is required, the Planning Letter will be published within 10 business days of

## Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/5/14

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regulatory approval. If an additional implementation meeting is required, the Planning Letter will be published within 3 weeks of the additional implementation meeting.

This notice should include a full disclosure of the associated testing period, permissive dialing period, affected NXXs, rate centers, records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification, the date it will become available and the disconnect date. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, new dialing procedures (if any) and a NANPA contact name and telephone number. Service providers that are code and/or block holders within the affected NPA should provide to the NANPA their company's NPA Relief Project Coordinator's contact information for inclusion in the company contact section of the Planning Letter.

## Appendix 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 stationery, business cards, advertising, CPE and 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)

## Relief Planning Meeting Aid

### Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

***This meeting aid is a compilation of industry developed Pros and Cons 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 ___ area code and would not have to change their telephone numbers.
	2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
	3 Easier education process
	4 Less customer confusion and easier education process
	5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
	6 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.
	7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
	8 Customers do not have to update personal printed material such as checks and websites, etc.
	9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth
	10 No need for synchronization of old and new NPAs in NPAC databases
	11 Minimizes call routing issues, especially with ported numbers
	12 Easier for service providers to implement from a translations, billing and service order system perspective
	13 Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table
	14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
	15 Does not split cities or counties into different area codes.
	16 Keeps communities of interest in tact.
	17 No impact on some wireless carriers that have to reprogram handsets manually
	18 No technical impacts to number portability, text messaging or multimedia messaging
	19 An all services overlay is simpler to implement from both a technical and customer education perspective and prevents

## Relief Planning Meeting Aid

### Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

					having to educate customers twice.
					20 An all services overlay would have a consistent local dialing pattern, as opposed to a concentrated overlay that could have two different types of local dialing in the ___ NPA.
					21 Helps move customers toward universal 10-digit dialing, recognizing the inevitable move of technology towards an internet protocol network, which requires 10-digit dialing.

### Overlay Pros and Cons:

Cons:

Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the ___ NPA and the new NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
					4 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
					5 Loss of geographic identity with an overlay.
					6 Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

### NPA Split Pros and Cons

Pros:

Alternative #					
					1 Customers retain seven-digit dialing for all calls within the same NPA.
					2 Maintains seven digit dialing for local calls within the same NPA
					3 Approximately ½ of customers would experience no change if they keep the XXX NPA
					4 Projected lives are balanced
					5 The projected lives are slightly more balanced than alternative



## Relief Planning Meeting Aid

### Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

					databases that must be updated with customers' new telephone numbers.
					16 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
					17 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
					18 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
					19 Split requires significant challenges to service provider's operational support systems and network elements.
					20 Splits cause customer confusion with caller ID during implementation.
					21 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					22 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					23 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					24 This split disrupts the SP's host-remote switch arrangement.
					25 Splits require the 800/SMS database to be updated.
					26 Splits reduce the geographic area served by one area code.
					27 Splits the city(s), counties or legislative districts into different area codes.
					28 Splits communities of interest.
					29 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

#### Concentrated Overlay Pros and Cons:

Pros:

Alternative #				
				1 Does not impact as many customers at once
				2 Only area of greatest code usage is overlaid (initial impact)

## Relief Planning Meeting Aid

### Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

#### **Concentrated Overlay Pros and Cons:**

Cons:

Alternative #				
				1 Splits host-remote arrangements for _____ Telco.
				2 Very short life before expansion is required
				3 A number of EAS routes cross this boundary
				4 Will require two customer education notices, the second when the overlay is expanded to cover entire area code; two full relief efforts.
				5 Customer confusion and education problems since it will have to be expanded in ____ years.
				6 Service providers that use one switch for multiple NPAs: a conc. Overlay is difficult to implement with complicated translations
				7 Concentrated overlay boundary splits time zone
				8 Would have to start implementation immediately and come back in a short amount of time to expand the overlay
				9 Discriminates against customers inside the overlay area that have to dial 10-digits immediately vs. those that get to keep 7-digit dialing outside of the concentrated overlay.
				10 Requires judgment in projecting exhaust of specific rate centers that may be false over time.

## 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.***

**OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE**

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

\*1+10 digit permissible at each service provider's discretion

<b>EVENT</b>	<b>TIMEFRAME</b>
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

**GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE**

<b>Type of Call</b>	<b>Call Terminating in</b>	<b>Dialing Plan</b>
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 <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

<b>EVENT</b>	<b>TIMEFRAME</b>
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

**FINAL**  
**INITIAL PLANNING DOCUMENT**  
**FOR**  
**RELIEF OF THE**  
**PENNSYLVANIA - 717 NPA**

**NORTH AMERICAN NUMBERING PLAN ADMINISTRATION**

**WAYNE MILBY**  
**SENIOR NPA RELIEF PLANNER**

August 10, 2015

## 717 NPA Background Information

### General Facts:

On July 1, 2014 the population of Pennsylvania was 12,787,209 compared to a population of 12,281,052 on April 1, 2000. Pennsylvania encompasses an area of 44,817 square miles and is bordered by New York on the north, New Jersey on the east, Maryland and West Virginia on the south and Ohio on the west. The state flower is the Mountain Laurel and the state bird is the Ruffed Grouse.

Pennsylvania currently has 11 active NPAs. Codes were first assigned in the 10<sup>th</sup> NPA, 878, during 2013 upon exhaust of codes in either the 412 or 724 NPA and codes were first assigned in the 272 NPA during 2014 upon exhaust of codes in the 570 NPA. The 717 NPA was created in January 1947. The 717 NPA covers the south-central portion of the Commonwealth of Pennsylvania. The Susquehanna River is almost a mile wide as it passes by the State Capitol in Harrisburg, Pennsylvania. The river flows from North to South through the entire 717 NPA entering the Chesapeake Bay at Harve de Grace, MD. It is the longest river lying entirely within the United States that drains into the Chesapeake Bay, providing half of the freshwater inflow for the entire Bay. The 717 NPA also includes Lancaster County, known as *the Garden Spot of America*. Lancaster is a popular tourist attraction due mostly to the Amish or Pennsylvania Dutch residents.

### General Facts and Assumptions

The April 2015 NRUF NPA Exhaust Projection is 3Q2018 and reflects an annualized central office code growth of 12 NXX codes or 1.3 codes per month for the 717 NPA.

During 2015 the total code assignments through June was 6 codes or 1.0 codes per month.

- Assignment History: 2014 – 15 assigned; 2013 – 8 assigned; 2012 – 11 assigned

There are 48 code holders in the 717 NPA

The 717 NPA has 107 rate centers: 8 rate centers have one NXX code assigned, 29 rate centers have two NXX codes assigned and one rate center has 140 codes assigned (Harrisburg City Zone 1, the tenth largest city in Pennsylvania).

Thousand-Block-Number Pooling started in March 2002. There are 105 rate centers that have mandatory pooling, 2 mandatory-single service provider rate centers, 0 rate centers that have optional pooling and 0 rate centers that are excluded from pooling.

As of August 10, 2015, the 717 NPA has 50 codes available and 20 unavailable codes.

The 717 NPA is in the 226 and 240 LATAs.

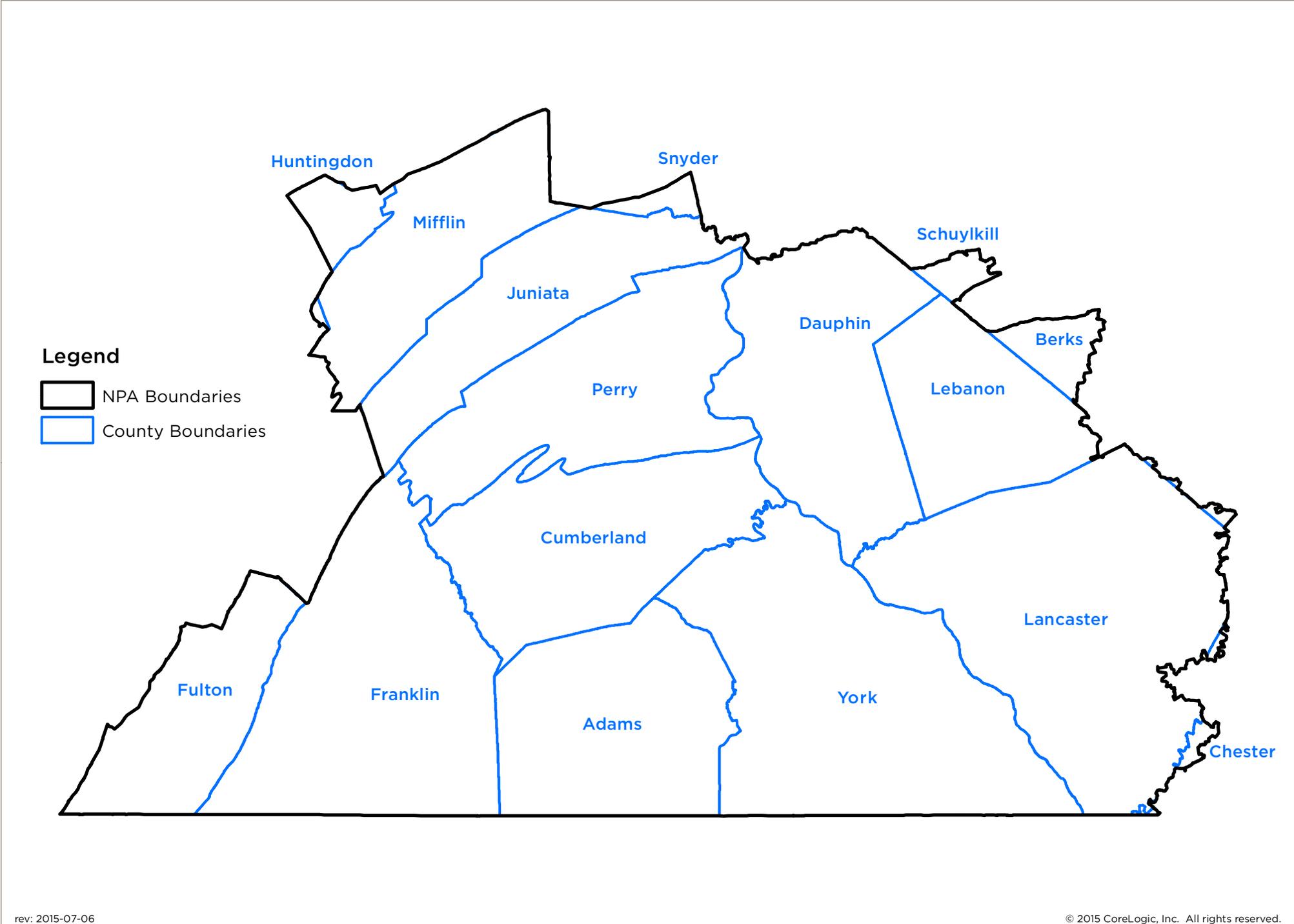
### Dialing Procedures for 717 NPA

Type of call	Call terminating to	Dialing plan
Local & Toll calls	Home NPA (HNPA)	7-digits (NXX-XXXX)
Local & Toll calls	Foreign NPA (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)

**Appendix E****General Attributes of the Most Common Relief Alternatives**

<b>Geographic Splits</b>	<b>All-Services Overlays</b>
<ul style="list-style-type: none"> <li>Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area.</li> </ul>	<ul style="list-style-type: none"> <li>With an overlay there will be more than one area code in a geographic area.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will not require existing customers to change their area code.</li> </ul>
<ul style="list-style-type: none"> <li>Geographic splits permit 7-digit dialing within an area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>Future splits will reduce the geographic size of the area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.</li> </ul>





## PENNSYLVANIA 717 NPA

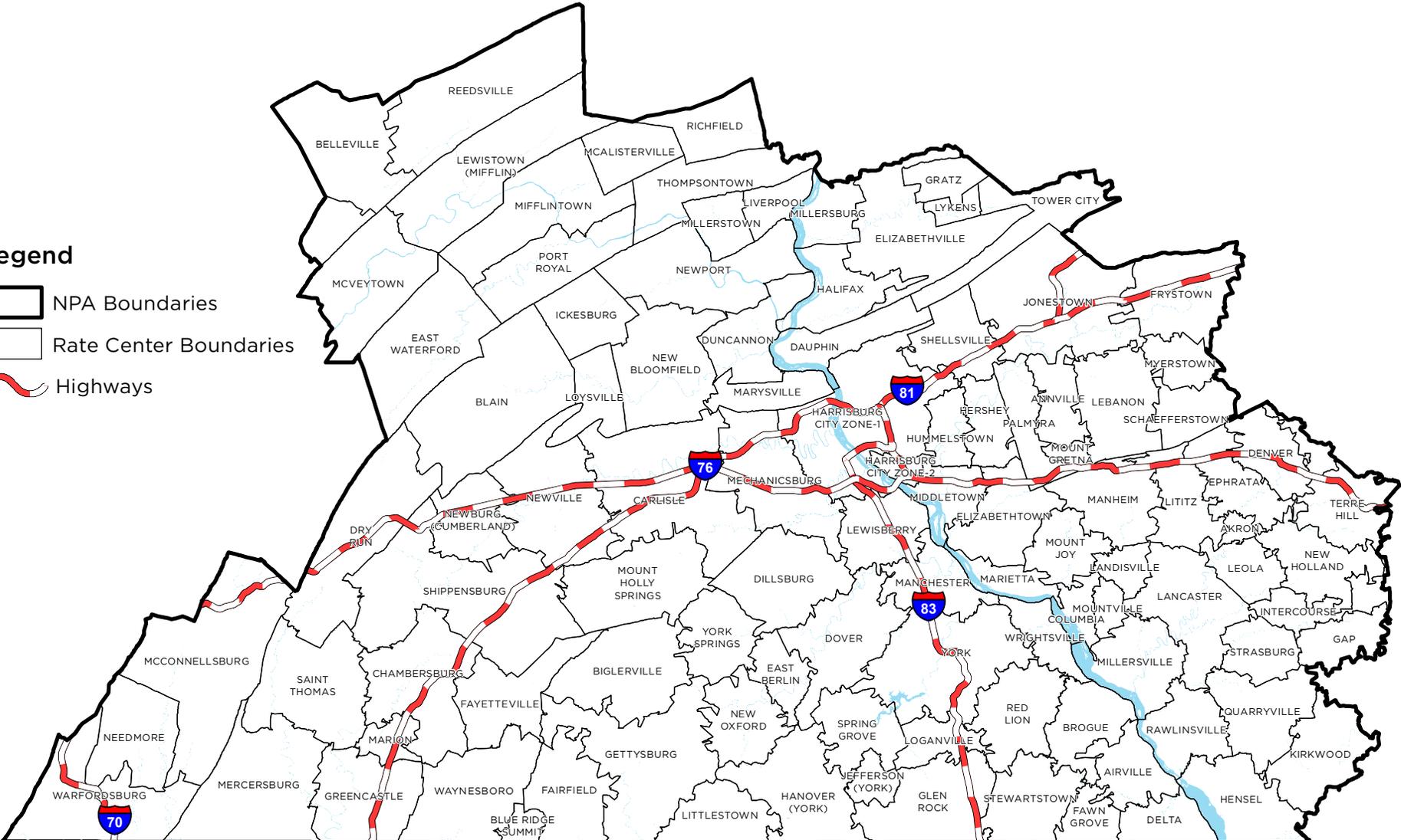
<u>COUNTY</u>	<u>POPULATION 7/1/14</u>	<u>POPULATION, PERCENT CHANGE 4/1/10 TO 7/1/14</u>
ADAMS	101,714	0.3%
BERKS	*413,691	0.5%
CHESTER	512,784	2.7%
CUMBERLAND	243,762	3.5%
DAUPHIN	271,453	1.3%
FRANKLIN	152,892	2.2%
FULTON	14,632	-1.4%
HUNTINGDON	45,750	-0.6%
JUNIATA	24,796	0.6%
LANCASTER	533,320	2.7%
LEBANON	136,359	2.1%
MIFFLIN	46,552	-0.3%
PERRY	45,634	0.7%
SCHUYLKILL	145,797	-1.7%
SNYDER	*40,323	1.6%
YORK	440,755	1.3%
State of Pennsylvania	12,787,209	0.7%

\* Only a portion of the county is in the 717 NPA



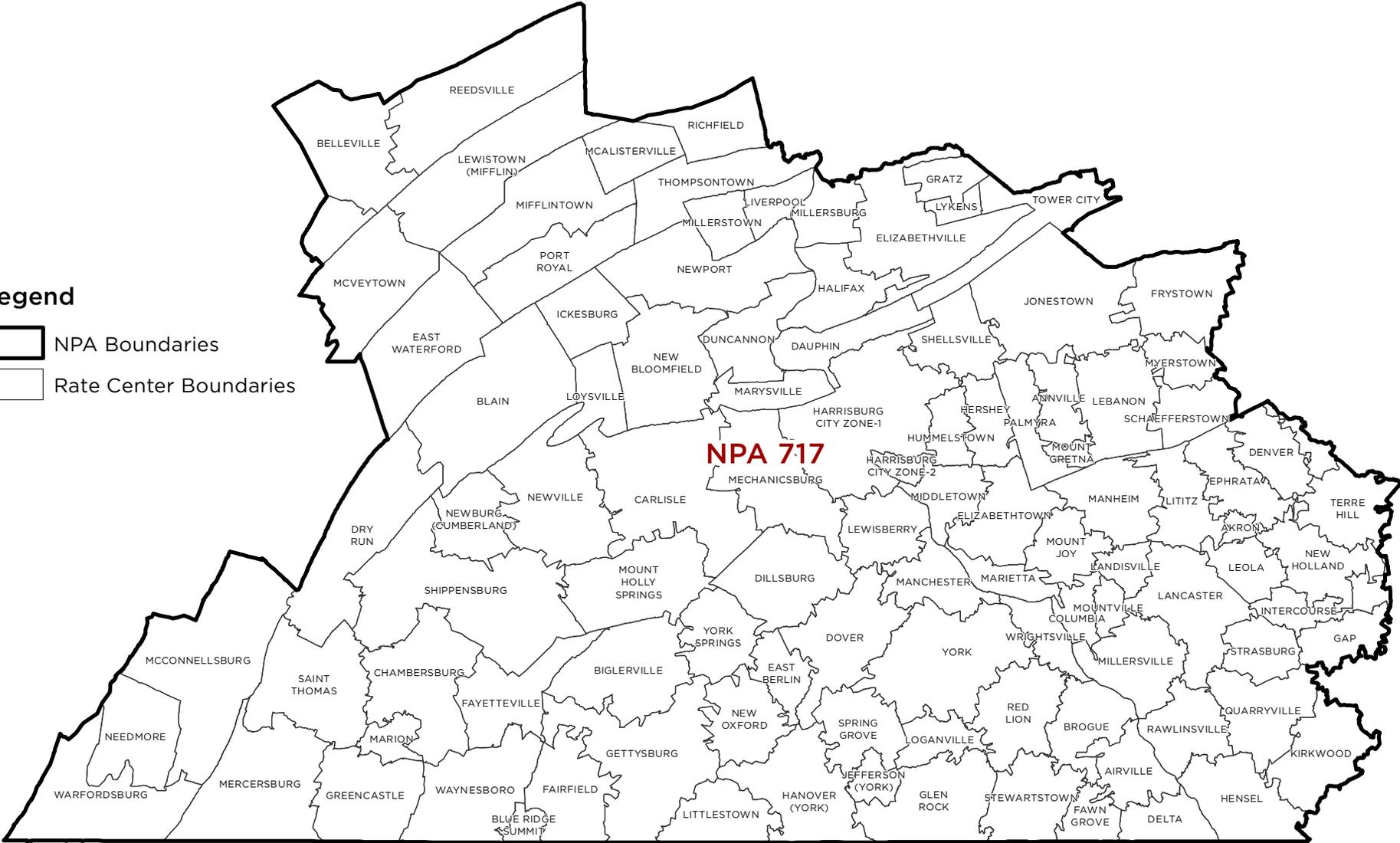
Legend

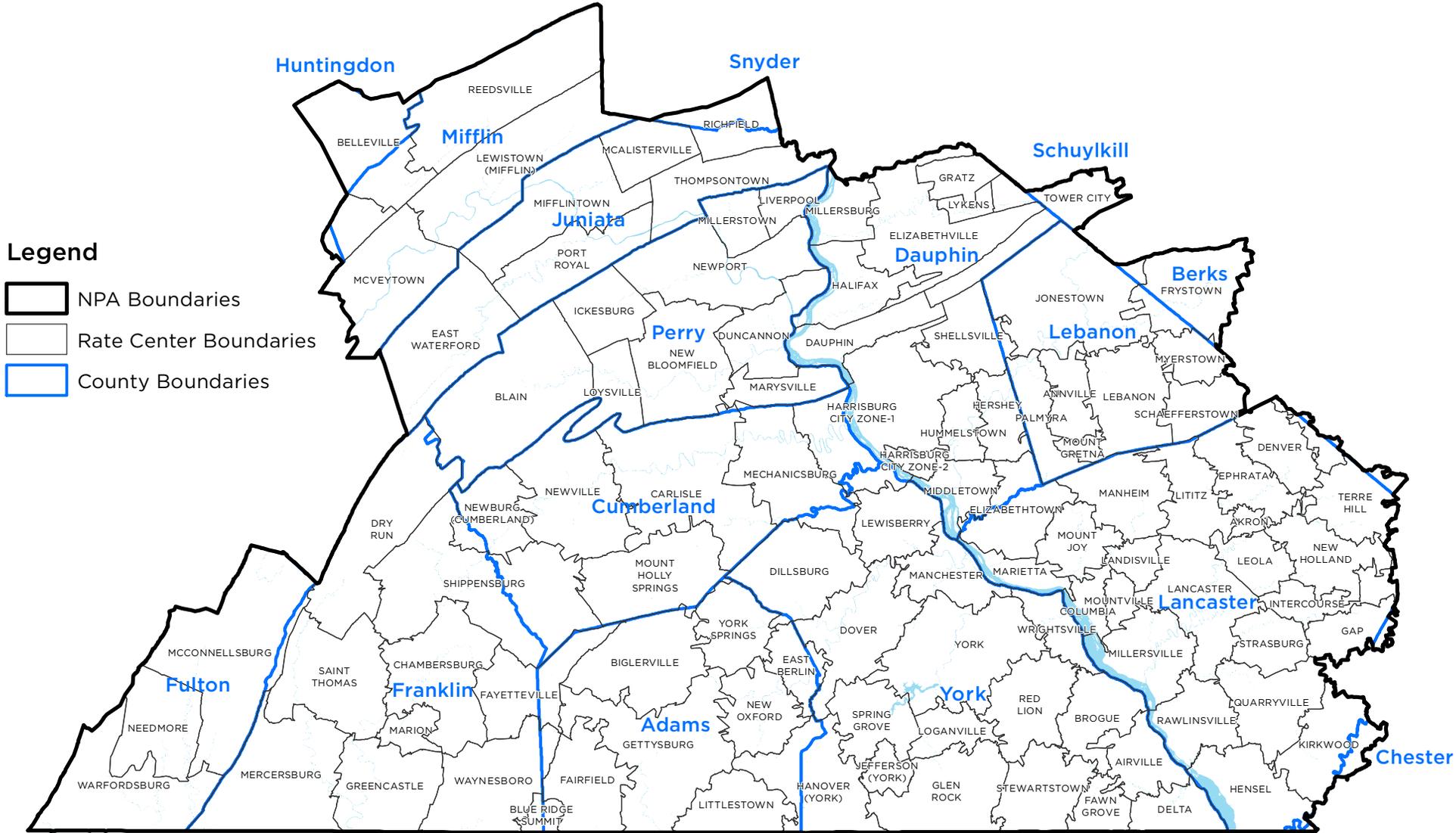
-  NPA Boundaries
-  Rate Center Boundaries
-  Highways



**Legend**

- NPA Boundaries
- Rate Center Boundaries







**STATE: PENNSYLVANIA****NPA: 717****RATE CENTER DATA DATE: June 4, 2015**

<b>Rate Center Name</b>	<b>Codes</b>
ADAMSTOWN	1
AIRVILLE	2
AKRON	2
ALLENSVL	2
ANNVILLE	3
BELLEVILLE	2
BIGLERVL	3
BLAIN	2
BLRDGSUMMT	4
BROGUE	2
CARLISLE	23
CHAMBERSBG	26
COLUMBIA	7
DAUPHIN	4
DELTA	3
DENVER	2
DILLSBURG	3
DOVER	3
DRY RUN	2
DUNCANNON	2
EASTBERLIN	2
ELIZABHTN	5
ELIZABTHVL	3
EPHRATA	6
EWATERFORD	2
FAIRFIELD	3
FAWN GROVE	2
FAYETTEVL	2
FRYSTOWN	2
GAP	2
GETTYSBURG	10
GLEN ROCK	4
GRATZ	1
GREENCASTL	4
HALIFAX	2
HANOVER	14
HARISBGZN1	140

HARISBGZN2	11
HENSEL	2
HERSHEY	12
HUMMELSTN	6
ICKESBURG	1
INTERCOURS	2
JEFFERSON	2
JONESTOWN	3
KIRKWOOD	2
LANCASTER	95
LANDISVL	6
LEBANON	27
LEOLA	3
LEWISBERRY	6
LEWISTOWN	13
LITITZ	4
LITTLESTN	2
LIVERPOOL	1
LOGANVILLE	2
LOYSVILLE	2
LYKENS	1
MANCHESTER	4
MANHEIM	3
MARIETTA	2
MARION	2
MARYSVILLE	2
MCALISTRVL	2
MCONELLSBG	3
MCVEYTOWN	1
MECHANCSBG	18
MERCERSBG	3
MIDDLETOWN	8
MIFFLINTN	2
MILLERSBG	2
MILLERSTN	3
MILLERSVL	6
MOUNT JOY	3
MOUNTVILLE	3
MT GRETNA	2
MTHOLLYSPG	2
MYERSTOWN	2
NEEDMORE	1

NEW OXFORD	5
NEWBLOMFLD	4
NEWBURG	2
NEWHOLLAND	3
NEWPORT	2
NEWVILLE	2
PALMYRA	5
PORT ROYAL	2
QUARRYVL	2
RAWLINSVL	2
RED LION	5
REEDSVILLE	2
RICHFIELD	2
SCHAEFESTN	2
SHELLSVL	3
SHIPPENSBG	5
SPRING GRV	3
ST THOMAS	3
STEWARTSTN	2
STRASBURG	4
TERRE HILL	2
THOMPSONTN	2
TOWER CITY	2
WARFORDSBG	1
WAYNESBORO	6
WRIGHTSVL	2
YORK	71
YORK SPG	3

**STATE: PENNSYLVANIA****NPA: 717****OCN DATA DATE: June 4, 2015**

OCN Name	OCN	Codes
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - PA	6392	64
SCHUYLKILL MOBILE FONE, INC.	6739	3
COMMONWEALTH TELEPHONE COMPANY	0161	15
TELCOVE OF YORK - PA	8497	18
D&E/OMNIPOINT WIREL JOINT VENT LP DBA PCS ONE	6846	25
AQUIS COMMUNICATIONS, INC.	6919	1
BIG RIVER TELEPHONE COMPANY, LLC - PA	218F	1
US LEC OF PENNSYLVANIA, INC.	2514	1
CORE COMMUNICATIONS, INC. - PA	3806	23
ADELPHIA BUSINESS SOLUTIONS OF HARRISBURG, INC.	8502	33
ATX TELECOMMUNICATIONS SERVICES, LTD	7757	4
CENTURYLINK COMMUNICATIONS LLC	7575	4
TCG NEW JERSEY, INC. - PA	7309	2
LOCAL ACCESS LLC - PA	968G	1
BANDWIDTH.COM CLEC, LLC - PA	002F	5
NEUTRAL TANDEM-PENNSYLVANIA, LLC - PA	547E	1
NEW CINGULAR WIRELESS PCS, LLC - DC	4036	69
INFINITE COMMUNICATION, LLC - PA	784E	1
YMAX COMMUNICATIONS CORP. - PA	283E	1
CHOICE ONE COMMUNICATIONS, INC. - PA	4024	10
FRONTIER COMMUNICATIONS OF PENNSYLVANIA, LLC	0168	8
BROADVOX-CLEC, LLC - PA	129D	1
TELEPORT COMMUNICATIONS AMERICA, LLC - PA	7315	1
SPRINT COMMUNICATIONS COMPANY, L.P. - PA	8739	3
365 WIRELESS, LLC	551G	1
LEVEL 3 COMMUNICATIONS, LLC - PA	4007	14
BROADVIEW NETWORKS, INC. - PA	1703	1
USA MOBILITY WIRELESS, INC.	6630	5
TELCOVE OF PENNSYLVANIA, INC. - PA	7237	1
PEERLESS NETWORK OF PENNSYLVANIA, LLC - PA	967E	1
VERIZON NORTH INC.-PA	0169	54
SERVICE ELECTRIC TELEPHONE COMPANY, LLC	8320	2
VOXBEAM TELECOMMUNICATIONS INC. - PA	992G	4
WINDSTREAM D & E SYSTEMS, INC. - PA	4114	20
SPRINT SPECTRUM L.P.	6664	11
WINDSTREAM D&E, INC.	0165	13
VERIZON NORTH INC.-PA (CONTEL)	0170	5

COMCAST PHONE OF PENNSYLVANIA, LLC - PA	6063	22
XO COMMUNICATIONS SERVICES INC - PA	7341	22
MCI WORLDCOM COMMUNICATIONS, INC. - PA	7434	2
VERIZON PENNSYLVANIA, INC.	9208	121
ARMSTRONG TELECOMMUNICATIONS, INC. - PA	422C	1
VIRGINIA PCS ALLIANCE, L.C.	6822	1
FRONTIER COMMUNICATIONS OF BREEZEWOOD, LLC	0149	2
UNITED TEL CO. OF PENNSYLVANIA DBA CENTURYLINK	0209	81
CTSI, INC. - PA	7513	14
AT&T LOCAL	7421	6
SPRINT SPECTRUM L.P.- PA	8458	29

# 717 NPA - RELIEF ALTERNATIVES

## PENNSYLVANIA

Numbering Plan Area Born on Date: January 1, 1947

### NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE..... April 2015  
PROJECTED EXHAUST DATE.....3Q2018  
ANNUALIZED CODE DEMAND PROJECTION.....12  
MONTHLY CO CODE DEMAND PROJECTION.....1.3

### **NPA RELIEF ALTERNATIVES**

#### OVERLAY ALTERNATIVE

##### **ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY**

A new NPA code would be assigned to the same geographic area occupied by the existing 717 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 717 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 726  
Total rate centers = 107  
Area Code Life in Years = 67

#### NPA SPLIT ALTERNATIVE

The exhausting NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

##### **ALTERNATIVE #2 – NPA SPLIT**

The proposed split boundary line runs along rate center boundaries in a west-to-east direction. The boundary line runs north of Dry Run, Chambersburg, Fayetteville, Biglerville, York Springs, Dillsburg, Dover, Manchester, Elizabethtown, Manheim, Lititz, Ephrata and Denver.

##### AREA “A”

Total CO Codes = 349  
Total rate centers = 48  
Area Code Life in Years = 71

##### AREA “B”

Total CO Codes = 377  
Total rate centers = 59  
Area Code Life in Years = 62

# 717 NPA - RELIEF ALTERNATIVES

## PENNSYLVANIA

### PROJECTED LIVES OF RELIEF ALTERNATIVES IN YEARS

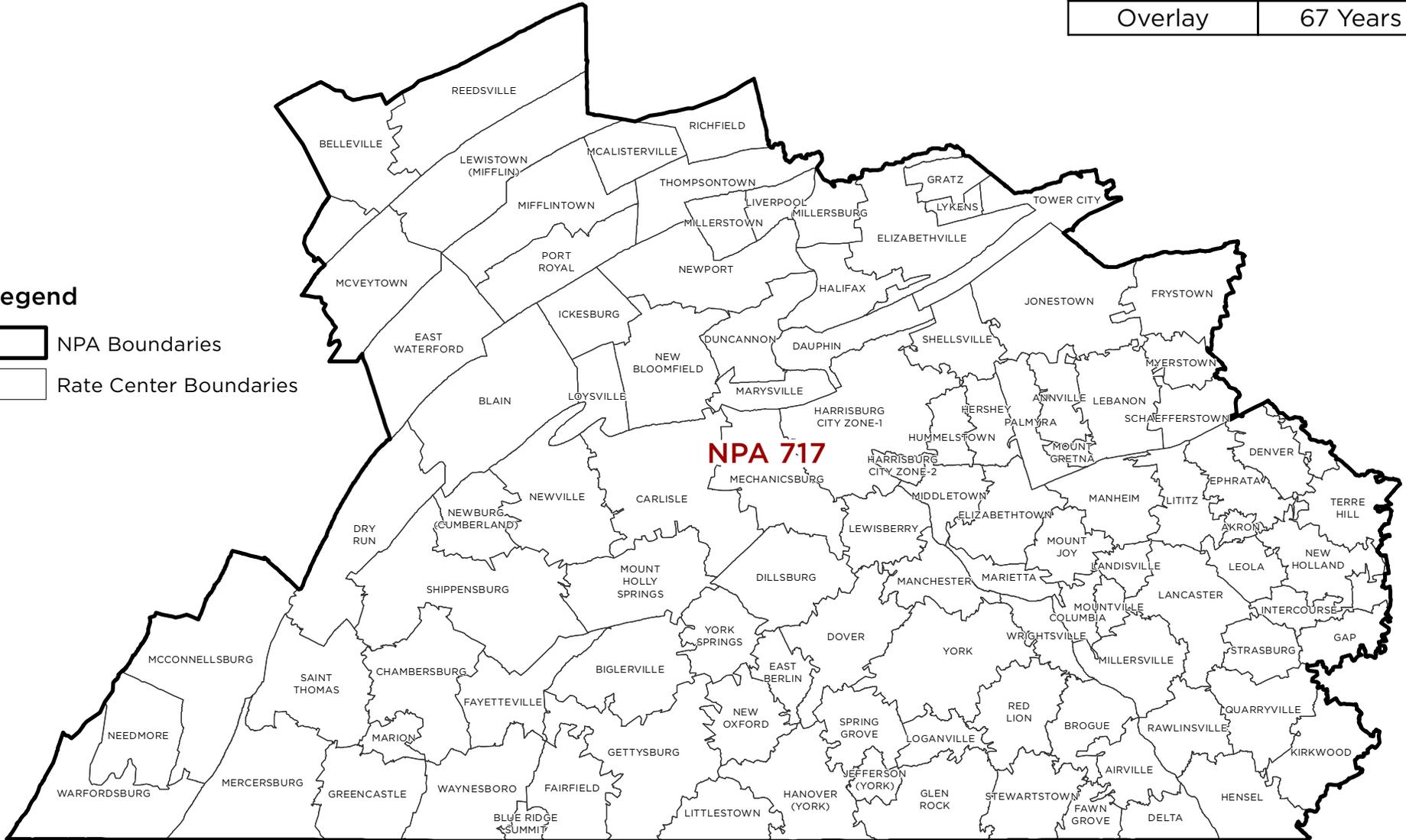
Alternative	Area A	Area B	Overlay
#1	-	-	67
#2	71	62	

## ALTERNATIVE #1 ALL SERVICES OVERLAY

Alternative #1	Projected Life
Overlay	67 Years

**Legend**

- NPA Boundaries
- Rate Center Boundaries





### ALTERNATIVE #2 NPA SPLIT

Projected Lives	
Area A	71 Years
Area B	62 Years

**Legend**

- Split Line
- NPA Boundaries
- County Boundaries

