

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

_____)	
Petition of the North American)	
Numbering Plan Administrator on Behalf)	
Of the Pennsylvania Telecommunications)	Docket Number: _____
Industry for Relief of the 215/267 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 party¹ NPA relief planner for Pennsylvania under the North American Numbering Plan and on behalf of the Pennsylvania telecommunications Industry (“Industry”),² petitions the Pennsylvania Public Utility Commission (“Commission”)³ to approve an all-services distributed overlay for relief for the 215/267 numbering plan area (“NPA”).⁴ The Industry submits its petition 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) for the 215/267 NPA will exhaust during the second quarter of 2019. In support of this application and on behalf of the Industry, NANPA submits the following:

¹ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

² The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 215/267 area code of Pennsylvania.

³ The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. See 47 C.F.R. § 52.19.

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, January 4, 2016) (“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 and can be accessed at www.atis.org/inc/incguides.asp.

I. BACKGROUND

2. In June 1999, the 267 overlay NPA was activated and placed into service to relieve the 215 NPA. The 215/267 NPA covers the southeastern area of Pennsylvania. The April 2016 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“2016 NRUF Report”), published by NANPA, indicates that the 215/267 NPA will exhaust the supply of CO codes during the second quarter of 2019.⁵ Based upon the projected exhaust of the 215/267 NPA, NANPA convened an Industry relief meeting via conference call on June 28, 2016 to address relief for the 215/267 NPA.⁶ Pursuant to the NPA Relief Planning Guidelines,⁷ NANPA distributed a notice to the Industry containing a draft relief petition prior to the relief planning meeting.⁸

II. DESCRIPTION OF THE OVERLAY RELIEF PLAN

3. The all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 215/267 NPA and is projected to last approximately 24 years. CO codes in the new overlay NPA will be assigned upon request upon the effective date of the new NPA code. At exhaust of the 215/267 NPAs, all future code assignments will be made in the new overlay NPA code. All existing customers would retain their 215 or 267 area code and would not have to change their telephone numbers. All local calls within and between the

⁵ April 2016 NRUF and NPA Exhaust Analysis (“2016 NRUF Report”). The 2016 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

⁶ A copy of the June 28, 2016 meeting minutes is attached as Exhibit A.

⁷ “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....” NPA Relief Planning Guidelines at §5.6.1.

⁸ NANPA’s May 26, 2016 notice to the industry is attached as Exhibit B and contains a meeting aid, CO Code assignment information, thousand block pooling statistics and an illustrative map of the overlay.

215/267 NPA and the new NPA would continue to be dialed using 10-digits.⁹ The current dialing plan would continue with the implementation of the new overlay relief plan. The dialing plan is set forth in the table below:

Dialing Plan for All Services Distributed Overlay

Type of call	Call terminating to	Dialing plan
Local and Toll	Within and between NPAs 215, 267 & new NPA	10-digits (NPA-NXX-XXXX)*
Local and Toll	Originating in NPAs 215, 267 and new NPA and terminating in other NPAs	1 + 10-digits (1 + NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0 + 10-digits (0 + NPA-NXX-XXXX)

*Permissively as 1+10 digits

4. The Industry participants reached consensus to recommend to the Commission a nine month schedule for implementation of the overlay with relief in place six months prior to the forecasted exhaust.¹⁰ The recommended schedule is as follows:

Recommended Implementation Schedule for All Services Distributed Overlay

EVENT	TIMEFRAME
Customer Education and Network Preparation Period *	Nine Months
Earliest Activation of CO Codes in the new NPA	At the completion of customer education and network preparation period

*There is no requirement for a permissive dialing period because mandatory 10 or 1+10-digit dialing is already in place.

⁹ 47 C.F.R. §52.19(c)(3)(ii).

¹⁰ The recommended relief should be in place six months prior to the forecasted exhaust. NPA Relief Planning Guidelines at §7.2.

III. CONCLUSION

5. The Industry has determined the need to initiate relief efforts for the 215/267 NPA in Pennsylvania to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving the Industry's petition for relief for the 215/267 NPA in the form of an all-services distributed overlay over the 215/267 NPA and its recommended nine month implementation schedule.

Respectfully submitted,



Kimberly Wheeler Miller

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Administrator, Neustar, Inc.
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D. Wayne Milby
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North American Numbering Plan Administrator
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August 4, 2016

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 215-267 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 blue ink, appearing to read "Wayne Milby", is written over a horizontal line.

Date: August 4, 2016

EXHIBIT A

July 18, 2016

To: All 215-267 NPA Code Holders and Other Members (Pennsylvania)

Subject: Final Relief Planning Meeting Minutes of 215-267 NPA in Pennsylvania

Attached are the final minutes from the June 28, 2016 industry meeting via conference call to review and approve the draft relief petition for the 215-267 NPA. The industry agreed to notify me of any changes or corrections at the email below no later than July 18 2016, when these minutes will become final. One minor correction was made in the last paragraph of page 2 and these minutes became final on July 18, 2016.

If you have any questions, please give me a call at 804-795-5919 or via email at the address below.

Sincerely,



D. Wayne Milby
Senior NPA Relief Planner – NANPA
e-mail: wayne.milby@neustar.biz

CC: Deb Sagerer – PA PUC Staff
David Screven – PA PUC Staff
Bryan Mahla – PA PUC Staff
Lois Burns – PA PUC Staff

Attachments

**PENNSYLVANIA – 215/267 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
FINAL MINUTES
June 28, 2016**

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.
- Distribute the notice with draft petition for approval at least three weeks prior to the Relief Meeting
- Review the recommended additional overlay to an existing overlay complex.
- The main objective is achieved by reaching consensus on the draft petition to recommend to the Pennsylvania PUC.
- Also determine any additional items to include in a filing with the PA PUC such as 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 comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

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

- Section 5.6.1 which states NANPA shall draft a relief plan petition requesting approval of the overlay and implementation schedule for implementation 6-months prior to forecasted exhaust.
- 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).

STATUS OF PENNSYLVANIA 215/267 NPA

Beth Sprague – NANPA provided a read-out of the monthly CO Code Assignment Activity for the Pennsylvania 215/267 NPAs. As of June 28, 2016, the 215 NPA has 771 codes assigned, 0 codes available for assignment and 29 Un-Assignable codes; the 267 NPA has 709 codes assigned, 64 codes available for assignment and 27 Un-Assignable codes (See Attachment #2). Wayne mentioned there are 58 service provider OCNs that are code holders in the 215/267 NPA and three service provider OCNs that are only one-thousand-block holders in the complex.

Wayne provided code assignment history for the two NPAs as follows: there were 30 codes assigned in 2015, 16 in 2014 and 21 in 2013 and 29 in 2012, The 2016 assignments year to date: 18 codes in 267 NPA: however, none were assigned from the 215 NPA since it's exhausted.

STATUS OF ONE-THOUSAND-BLOCK POOLING IN 215/267 NPAs

Cecilia McCabe, NeuStar Pooling Implementation, stated number pooling started in the 215/267 NPA on August 7, 2002. There are 36 rate areas and they are all in mandatory pooling. From July 1, 2015 through June 27, 2016, there have been 797 blocks assigned and 694 blocks are available as of June 27, 2016. For the same period, Pooling has assigned 41 codes; 35 for pool replenishment, one for a dedicated customer and 5 for LRNs. The forecasted need for codes for the next twelve months is 43 codes for pool replenishment and dedicated customers and 0 for LRNs. (See Attachment #3)

BACKGROUND:

The 215/267 NPA covers the Southeastern area of Pennsylvania. In June 1999, the 267 overlay was activated and placed into service with a projected life of 4.5 years. On December 2, 1999 NANPA convened a meeting with the telecommunications industry to discuss relief alternatives for addressing numbering exhaust in the 267 NPA. 364 NNX codes had been assigned from the 267 NPA since its June 1999 activation. Due to the implementation of thousands-block (1K) number pooling, the exhaust date for 215/267 was changed from the 1Q2005 to the 4Q2008.

Wayne then briefly reviewed the code holder table, rate center table and state area code map and rate center map for the 215/267 NPAs.

REVIEW DRAFT RELIEF PETITION FOR THE 215/267 NPA

Wayne reviewed the draft relief petition for the 215/267 NPA distributed on May 26, 2016, which recommends an additional overlay for the existing overlay complex. A new NPA code would be assigned to the same geographic area occupied by the existing 215/267 NPA. Customers would retain their current telephone numbers and ten-digit dialing by all customers within and between NPAs in the affected area would continue. Calls originating in NPAs 215, 267 and the new NPA and terminating in other NPAs would continue to be dialed using 1 + 10 digits.

Dialing Plan for All Services Distributed Overlay

Type of call	Call terminating to	Dialing plan
Local and Toll	Within and between NPAs 215, 267 & new NPA	10-digits (NPA-NXX-XXXX)*
Local and Toll	Originating in NPAs 215, 267 and new NPA and terminating in other NPAs	1 + 10-digits (1 + NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0 + 10-digits (0 + NPA-NXX-XXXX)

*Permissively as 1+10 digits

Codes in the new overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 215/267 NPAs all future code assignments will be made in the new overlay area code. The projected life is approximately 24 years. Consensus was reached to approve NANPA’s recommended petition.

ESTABLISH IMPLEMENTATION SCHEDULE

A recommendation was made and consensus reached to recommend to the Commission a 9-month schedule for implementation of the overlay with the new NPA effective 6-months prior to the forecasted exhaust. Since mandatory 1+10-digit dialing is already in place there is no permissive dialing period. The recommended schedule is as follows:

Intervals for recommended Overlay:

EVENT	TIMEFRAME
Customer Education and Network Preparation	9 months
Earliest activation of CO Codes in New NPA <i>(Effective date for codes from the new NPA)</i>	At completion of customer education and network preparation period

STATEMENTS FOR THE RECORD

There were no statements submitted for the record.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will file the petition with the Pennsylvania Public Utility Commission (“PA PUC”) informing them of the outcome of this relief meeting. The INC guidelines reflect the relief petition is to be filed with the regulator within 6 weeks (8/9/16) of the initial relief planning meeting unless otherwise decided by the industry.

REVIEW OF DRAFT MEETING MINUTES & COMMISSION FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by July 11, 2016 and any corrections are to be submitted to Wayne via wayne.milby@neustar.biz no later than July 18, 2016 when the minutes will become final.

Adjourned

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One minor correction was made in the last paragraph of page 2 and these minutes became final July 18, 2016.

**PENNSYLVANIA – 215-267 NPA
RELIEF PLANNING Pre-IPD MEETING
Final Meeting Attendees
June 28, 2016**

PARTICIPANTS

NAME	COMPANY
George Guerra	AT&T
Shannon Donohue	CALLFIRE
Margaret Cox	CenturyLink
Rita Schmitz	CenturyLink
Allyson Blevins	Charter
Stacey Hines	Charter
Andres Alcaraz	Inteliquent
Nicolas Galvis	Inteliquent
Deb Sagerer	PA PUC
David Screven	PA PUC
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA
Cecilia McCabe	Neustar Pooling Imp
Linda Hymans	Neustar Pooling Regulatory
Caryn Gerczak	Netcarrier Telecom
Pat Phipps	Peerless Network
Shaunna Forshee	Sprint
Karen Riepenkroger	Sprint
Cherry Hill	T-Mobile
Barbara Ingram	Verizon
Kathy Bonette	Verizon
Laura Dalton	Verizon
Yun Lee	Verizon Business
Dana Crandall	Verizon Wireless
Elizabeth Ward	Verizon Wireless

Pennsylvania
 NPA 215-267 NXX Summary
 Data as of June 28, 2016

<u>NPA</u>	<u>215</u>	<u>267</u>				
Assigned NXXs	771	709				
Protected NXXs	0	0				
Reserved NXXs	0	0				
Unavailable NXXs	29	27				
Available NXXs	0	64				
Total	800	800				
Assignment History						
2011	5	11				
2012	1	28				
2013	0	21				
2014	3	13				
2015	3	27				
2016	0*	18*				
*As of June 28, 2016						
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).						

POOLING STATISTICS	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	PA 215/267
MEETING DATE:	6/28/2016
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)	8/7/2002
RATE CENTERS	
<i># Total</i>	36
<i># Mandatory</i>	36
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	797
<i>(For time period 7/01/15- 6/27/16/16)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	694
<i>(As of preparation date: 6/27/16)</i>	
CODES ASSIGNED	
<i># Total</i>	41
<i># for Pool Replenishment</i>	35
<i># for Dedicated Customers</i>	1
<i># for LRNs</i>	5
<i>(For time period 7/01/15- 6/27/16)</i>	
CODES FORECASTED	
<i># Total</i>	43
<i># for Pool Replenishment and Dedicated Customers</i>	43
<i># for LRNs</i>	0
<i>(For the next twelve months as of 6/27/16)</i>	