

**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 814 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, petitions the Pennsylvania Public Utility Commission (“Commission”)¹ on behalf of the Pennsylvania telecommunications industry (“Industry”)² to approve the Industry’s consensus³ recommendation of an all-services distributed overlay of the 814 numbering plan area (“NPA”) as the preferred method for relief for the 814 NPA.⁴ The Industry submits its recommendation to the Commission based upon NANPA’s projections that absent NPA relief,

¹ The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19.

² The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 814 area code of Pennsylvania.

³ As used in this document, the word “consensus” means that 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. The Alliance for Telecommunications Industry Solutions Inc. (“ATIS”) Operating Procedures at https://www.atis.org/01_legal/docs/OP.pdf, §7.1, ver. 5.4 (ATIS Mar. 1, 2015).

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

the supply of central office codes (often referred to as “CO” or “NXX” codes) for the 814 NPA will exhaust during the second quarter of 2021.⁵ To allow sufficient time for implementation of the selected relief plan prior to exhaust of CO codes in the 814 NPA, the Industry requests that the Commission also 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 814 NPA is one of the original four Pennsylvania NPAs assigned in 1947. It is the only area code that has not experienced any area code relief. The 814 NPA generally serves the central portion of Pennsylvania. The 814 NPA extends in a northerly direction towards the New York state border, in a westerly direction towards the Ohio state border, and in a southerly direction towards the Maryland state border. A few of the larger cities in the 814 NPA are Altoona, Erie, Johnstown, and State College.

3. The relief planning process for the 814 NPA started in 2002. On March 21, 2002, NANPA convened the Industry to review relief alternatives. The Industry reached consensus to recommend an all-services distributed overlay. However, due to the implementation of thousand-block pooling, the life of the 814 area code was lengthened. Consequently, the Industry decided to delay filing the petition until the NRUF reports indicated a more immediate need for relief.

4. The April 2009 NRUF Report indicated exhaust of the 814 NPA would be in the third quarter of 2012. The Industry met on April 19, 2009 and decided to file the petition for relief with this Commission. NANPA subsequently filed the petition on June 9, 2009.

⁵ April 2018 Numbering Resource Utilization Forecast (“NRUF”) and NPA Exhaust Analysis (“2018 NRUF Report”). The 2018 NRUF Report can be accessed on the NANPA website at https://www.nationalnanpa.com/reports/reports_npa.html.

5. By Order dated July 29, 2009, the Commission denied the Industry's recommendation for relief and requested written comments from interested parties on the five relief alternatives that were presented in the Initial Planning Document. Thereafter, by Order entered December 17, 2010 in Docket P-2009-2112925, the Commission ordered an area code split of the 814 NPA. Following the order to split the area code, the Commission received numerous petitions for reconsideration of its decision. By Order entered January 13, 2011, the Commission granted the petitions for reconsideration.

6. In a subsequent Order entered April 26, 2012, the Commission stated that due to conservation measures and a decrease in demand for NXX codes in the 814 NPA, the need for relief was no longer necessary.⁶ The Commission dismissed the petition that NANPA had filed on June 9, 2009 and rescinded its December 17, 2010 Order implementing a geographic split.

II. RELIEF ALTERNATIVES PREPARED BY NANPA

7. NANPA started the instant relief planning process thirty-six months prior to the anticipated exhaust of the NPA in the 2nd quarter of 2021, by organizing an initial relief planning meeting to be held with the Industry on July 12, 2018. In advance of that meeting, NANPA prepared an Initial Planning Document ("IPD") that was distributed to the Industry on June 13, 2018.⁷ During the initial relief planning meeting held with the Industry, the NANPA discussed the relief alternatives proposed for the 814 NPA. As Alternative #1, NANPA proposed an all

⁶ In the order, the Commission noted the following: "*Nevertheless, we note for the record that the overwhelming testimony received at the public input hearings was in favor of rescinding the geographic split decision and implementing an overlay as the appropriate form of area code relief for the 814 area code. Residents and businesses located within the 814 area code testified that they preferred the implementation of the overlay as the form of area code relief because they believed that it was the least disruptive of area code relief. Additionally, at the technical conferences, the telecommunications carriers submitted testimony and evidence that the implementation of an overlay presented less technical complications and network issues compared to the implementation of a geographic split of an area code.*"

⁷ The IPD is attached as Exhibit A.

services distributed overlay, and as Alternative #2, NANPA proposed a geographic split.⁸ There were no other relief plans proposed or discussed. Primarily due to concerns regarding the burdens that a geographic split places on consumers and businesses that must change their telephone numbers with a split, the Industry reached consensus that Alternative #2 should be removed from consideration. The Industry then reached consensus that Alternative #1, the all-services distributed overlay, should be recommended to the Commission as the choice of relief for the 814 NPA.

III. DESCRIPTION OF THE RECOMMENDED ALL-SERVICES DISTRIBUTED OVERLAY

8. Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 814 NPA. All existing customers would retain the 814 area code and would not have to change their telephone numbers. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. When the 814 NPA exhausts, all CO code assignments will be made from the new overlay area code.

9. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 814 NPA and the new NPA.⁹ The Industry recommends that local calls between NPAs be dialed using 10 digits, toll calls between NPAs be dialed using 1+10-digits and 0+10 dialing for operator assisted calls.

The following table illustrates the recommended dialing plan:

⁸ A more detailed description of these alternatives, as well as a listing of the pros and cons discussed by the Industry members, is included in the minutes of the initial planning meeting, beginning on p. 4 of the attached Exhibit B.

⁹ 47 C.F.R. §52.19(c)(3)(ii).

Recommended Dialing Plan for All-Services Distributed Overlay

Type of Call	Call Terminating in	Dialing Plan
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

10. Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementation of the overlay. Adhering to the proposed timeframe will avoid the denial or delay of service to the customers of telecommunications providers due to the unavailability of CO codes. The recommended schedule is as follows:

Recommended Implementation Schedule for All-Services Distributed Overlay

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 814 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing begins at the end of the Permissive Dialing Period	6 months
First Code Activation <i>(Earliest effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing)
Total Implementation Interval	13 months

IV. CONCLUSION

11. The Industry has determined the need to initiate relief efforts for the 814 NPA in Pennsylvania to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving the Industry's recommendation of an all-services

distributed overlay as the relief method for the 814 NPA. The Industry also requests that the order approve the Industry-recommended 13-month relief implementation schedule for the overlay.

Respectfully submitted,

/s/

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August 23, 2018

VERIFICATION

I, Heidi Wayman, 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 814 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).

Date: August 23, 2018

A handwritten signature in black ink, appearing to read 'H. Wayman', written over a horizontal line.

Heidi Wayman
NPA Relief Planner
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EXHIBIT A

June 12, 2018

To: All 814 NPA Code Holders and Other Industry Members (Pennsylvania)

Subject: Initial Planning Document with Notice of the 814 NPA Relief Planning Meeting

Neustar, Inc., in its capacity as the North American Numbering Plan Administration (NANPA) is responsible for initiating area code relief (in accordance with the NPA Code Relief Planning and Notification Guidelines, ATIS-0300061) in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically thirty-six months prior to exhaust. The April 2018 Numbering Resource Utilization Forecast (NRUF) projects the 814 NPA will exhaust during the 2Q2021.

Accordingly, on July 12, 2018, NANPA will convene an industry NPA relief planning conference call to develop a recommended relief plan for the 814 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 814 NPA. The resulting relief plan will be filed with the Pennsylvania Public Utilities 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.

An Initial Planning Document (IPD) for the 814 NPA is attached and will be presented at the July 12, 2018 meeting to assist the Industry with NPA relief planning efforts. NANPA also welcomes the submission of additional relief alternatives from interested parties. While additional relief alternatives will be accepted during the July meeting, advance submission is recommended to allow interested parties adequate time to review them prior to the meeting.

Also attached to this notice are the July meeting agenda, consensus process, relief planning meeting aids, the Pennsylvania 814 NPA NXX Summary report and Pooling Statistics report for your review during the IPD conference call. Additionally attached is a NPA Relief Planning Meeting Aid with a compilation of Pros and Cons of alternatives that have been developed by the industry at various relief planning meetings. The industry may use this as a reference in the review of the alternatives and the selection of their recommendation to the Pennsylvania PUC.

Because the resulting impacts of NPA relief planning are so significant, NANPA strongly encourages your participation at the July 12, 2018 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 814 NPA relief planning meeting are as follows:

Date: July 12, 2018

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

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 provided below:

Click on the Link Below. You must register in order to join the online WebEx event. Once you register, you will receive a confirmation email that contains detailed information about joining the event. Click on the attachment in your confirmation email labeled, "Pennsylvania 814 NPA Relief Planning Meeting" to add this event to your calendar.

<https://neustar.webex.com/neustar/onstage/g.php?MTID=e3a9d96fa0129330f6e7357916dbeeee3>

Meeting number: 624 155 001

Meeting password: xJ4kNg33

Please feel free to distribute this notice to others in the industry that you feel should attend this 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 814 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nationalnanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (571) 434-5765 or via email at heidi.wayman@team.neustar.

Sincerely,

Heidi A. Wayman
NPA Relief Planner
NANPA

CC: Mark Lum – PA PUC Staff
David Screven – PA PUC Staff

Attachments

**PENNSYLVANIA 814 NPA
INITIAL RELIEF PLANNING
INDUSTRY MEETING
VIA CONFERENCE CALL**

**July 12, 2018 - 2:00 PM (ET)
BRIDGE: (630) 827-6799; PASSCODE: 8831535 #**

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review of 814 NPA Background, History and Status

Review of Initial Planning Document and Proposed Relief Alternatives

Discussion and Elimination of Relief Alternatives

Consensus on Relief Alternative and Dialing Plan

Consensus on Implementation Intervals

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

3/1/2015

ATIS OPERATING PROCEDURES

VERSION 5.4

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in Appendix A.

Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

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

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

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion. A participant may appeal the resolution of an issue in the manner provided for in Section 13.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 1/4/16

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.

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 (where 10-digit dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹

¹ 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 – 1/4/16

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.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e. two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the premise that all NXXs available for 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,

² 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 – 1/4/16

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 should be made at this point. Examples of attributes are shown in Appendix E.
- 5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a 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 and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.
- 5.5 Conduct Industry Meetings with the Goal of Reaching Industry Consensus on a Relief Plan – Conduct Industry Meetings/Conference Calls with the Goal of Reaching Industry Consensus on a Relief Plan – Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration³. NANPA shall moderate these meetings or conference calls and be fully prepared to

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

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 1/4/16

answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry consensus, subsequent meetings/conference calls shall be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

In discussing the alternatives, issues such as new NPA boundaries, local calling areas, protected codes or routes, 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 authority.

- 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

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 1/4/16

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.

- 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 local⁴ 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.

⁴ 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 – 1/4/16

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 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 dialing procedures.

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 its 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.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 1/4/16

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

This Planning Letter 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 NPA boundaries, dialing procedures 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)

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

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

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	
					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 not withstanding 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

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	
					1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 518 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 #					
				2	
					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

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

					# __.
					6 The projected lives are more balanced
					7 This alternative allows _____ to maintain operations on one side of the split line.
					8 _____ operating territory is kept in tact
					9 Retains the geographic identity with one area code.
					10 Keeps the cities on both sides of the split lines intact.

NPA Split Pros and Cons:

Cons:

Alternative #					
			2		
					1 Splits _____ operating territory between two NPAs
					2 _____ EAS calling is heavily disrupted
					3 Projected lives are imbalanced, _ years difference, least balanced of the split alternatives, could become more imbalanced if demand changes in future years
					4 Requires approximately ½ of ____ NPA customers to change their area code, thus creating winners and losers.
					5 Requires NPA change for approximately ½ of ____ NPA customers
					6 Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
					7 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.
					8 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
					9 All ____ NPA customers previously went through a split _ years ago and half will have to change again
					10 Difficult PSC/PUC decision on which side retains the old NPA.
					11 Longer time period needed for service providers to implement this type of relief.
					12 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
					13 More complicated and costly to implement for service providers in their billing, translations and database systems.
					14 Splits affect alarm systems and E-911 databases.
					15 Negative impacts to E911, industry and alarm system

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)

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

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

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

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

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

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

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period (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) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation (Effective date for codes from the new NPA)	End of Recording Period
Total Implementation Interval	15 months

PEPANNRES

Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2017

2017 Population Estimates

Geography	April 1, 2010		Population Estimate (as of July 1)		
	Census	Estimates Base	2010	2011	2012
Pennsylvania	12,702,379	12,702,857	12,711,063	12,742,811	12,768,034
Armstrong County, Pennsylvania	68,941	68,938	68,860	68,484	68,069
Bedford County, Pennsylvania	49,762	49,768	49,691	49,615	49,580
Blair County, Pennsylvania	127,089	127,076	127,030	126,989	126,593
Butler County, Pennsylvania	183,862	183,862	184,084	184,611	184,854
Cambria County, Pennsylvania	143,679	143,674	143,452	142,561	141,518
Cameron County, Pennsylvania	5,085	5,085	5,073	4,998	4,962
Centre County, Pennsylvania	153,990	154,030	154,280	155,039	155,909
Clarion County, Pennsylvania	39,988	39,991	39,927	39,890	39,445
Clearfield County, Pennsylvania	81,642	81,594	81,515	81,364	81,349
Crawford County, Pennsylvania	88,765	88,761	88,631	88,188	87,754
Elk County, Pennsylvania	31,946	31,946	31,846	31,757	31,578
Erie County, Pennsylvania	280,566	280,564	280,775	281,288	281,503
Fayette County, Pennsylvania	136,606	136,602	136,439	135,984	135,254
Forest County, Pennsylvania	7,716	7,716	7,711	7,671	7,587
Fulton County, Pennsylvania	14,845	14,844	14,875	14,777	14,750
Huntingdon County, Pennsylvania	45,913	46,031	46,029	46,041	45,990
Indiana County, Pennsylvania	88,880	88,893	88,869	88,608	88,246
Jefferson County, Pennsylvania	45,200	45,196	45,162	44,899	44,775
McKean County, Pennsylvania	43,450	43,450	43,333	43,114	43,099
Mercer County, Pennsylvania	116,638	116,674	116,616	116,139	115,641
Mifflin County, Pennsylvania	46,682	46,682	46,634	46,712	46,738
Potter County, Pennsylvania	17,457	17,458	17,462	17,455	17,554
Somerset County, Pennsylvania	77,742	77,746	77,781	77,304	77,051
Tioga County, Pennsylvania	41,981	41,896	41,972	42,244	42,478
Venango County, Pennsylvania	54,984	54,983	54,973	54,683	54,211
Warren County, Pennsylvania	41,815	41,815	41,775	41,502	41,262
Westmoreland County, Pennsylvania	365,169	365,164	365,134	364,494	362,891

Geography	Population Estimate (as of July 1)				
	2013	2014	2015	2016	2017
Pennsylvania	12,778,450	12,790,341	12,791,124	12,787,085	12,805,537
Armstrong County, Pennsylvania	67,856	67,419	66,638	66,132	65,642
Bedford County, Pennsylvania	49,348	49,186	48,789	48,652	48,480
Blair County, Pennsylvania	125,977	125,502	124,818	123,927	123,457
Butler County, Pennsylvania	185,015	185,701	185,891	186,207	187,108
Cambria County, Pennsylvania	138,749	137,386	135,854	134,313	133,054
Cameron County, Pennsylvania	4,915	4,817	4,765	4,683	4,592
Centre County, Pennsylvania	158,298	159,637	160,553	162,083	162,660
Clarion County, Pennsylvania	39,037	38,861	38,821	38,558	38,458
Clearfield County, Pennsylvania	81,378	80,947	80,651	80,035	79,685
Crawford County, Pennsylvania	87,579	87,293	86,701	86,505	86,159
Elk County, Pennsylvania	31,401	31,094	30,788	30,423	30,197
Erie County, Pennsylvania	280,647	279,351	278,111	276,321	274,541
Fayette County, Pennsylvania	134,586	134,027	133,290	132,392	131,504
Forest County, Pennsylvania	7,534	7,445	7,357	7,306	7,297
Fulton County, Pennsylvania	14,692	14,637	14,621	14,617	14,590
Huntingdon County, Pennsylvania	45,928	45,869	45,640	45,503	45,491
Indiana County, Pennsylvania	88,195	87,486	86,867	85,256	84,953
Jefferson County, Pennsylvania	44,814	44,477	44,240	43,955	43,804
McKean County, Pennsylvania	42,731	42,526	42,247	41,518	41,330
Mercer County, Pennsylvania	115,170	114,777	113,746	112,673	111,750
Mifflin County, Pennsylvania	46,635	46,492	46,427	46,316	46,388
Potter County, Pennsylvania	17,437	17,157	17,030	16,925	16,802
Somerset County, Pennsylvania	76,679	76,292	75,553	75,070	74,501
Tioga County, Pennsylvania	42,264	41,932	41,534	41,227	40,793
Venango County, Pennsylvania	53,840	53,363	52,966	52,469	51,762
Warren County, Pennsylvania	40,982	40,710	40,374	39,998	39,659
Westmoreland County, Pennsylvania	360,804	358,962	356,995	354,788	352,627

Note:

The estimates are based on the 2010 Census and reflect changes to the April 1, 2010 population due to the Count Question Resolution program and geographic program revisions. See Geographic Terms and Definitions at <http://www.census.gov/programs-surveys/popest/guidance-geographies/terms-and-definitions.html> for a list of the states that are included in each region and division. All geographic boundaries for the 2017 population estimates series except statistical area delineations are as of January 1, 2017. The Office of Management and Budget's statistical area delineations for metropolitan, micropolitan, and combined statistical areas, as well as metropolitan divisions, are those issued by that agency in July 2015. An "(X)" in the 2010 Census field indicates a locality that was formed or incorporated after the 2010 Census. For population estimates methodology statements, see <http://www.census.gov/programs-surveys/popest/technical-documentation/methodology.html>.

The 6,222 people in Bedford city, Virginia, which was an independent city as of the 2010 Census, are not included in the April 1, 2010 Census enumerated population presented in the county estimates. In July 2013, the legal status of Bedford changed from a city to a town and it became dependent within (or part of) Bedford County, Virginia. This population of Bedford town is now included in the April 1, 2010 estimates base and all July 1 estimates for Bedford County. Because it is no longer an independent city, Bedford town is not listed in this table. As a result, the sum of the April 1, 2010 census values for Virginia counties and independent cities does not equal the 2010 Census count for Virginia, and the sum of April 1, 2010 census values for all counties and independent cities in the United States does not equal the 2010 Census count for the United States. Substantial geographic changes to counties can be found on the Census Bureau website at <http://www.census.gov/geo/reference/county-changes.html>.

Suggested Citation:

Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2017

Source: U.S. Census Bureau, Population Division

Release Dates: For the United States, regions, divisions, states, and Puerto Rico Commonwealth, December 2017. For counties, municipios, metropolitan statistical areas, micropolitan statistical areas, metropolitan divisions, and combined statistical areas, March 2018. For cities and towns (incorporated places and minor civil divisions), May 2018.

Initial Planning Document
For
Relief of Pennsylvania 814 NPA

July 12, 2018

North American Numbering Plan Administration

Heidi A. Wayman
NPA Relief Planner

814 NPA Background Information

General Facts:

Pennsylvania was one of the original Thirteen Colonies. It was founded by William Penn. The name Pennsylvania means Penn's Woods after Admiral Penn. It became part of the Union December 12, 1787.

Relief Planning Background and Assumptions:

The 814 NPA is one of the original four Pennsylvania NPAs assigned in 1947. It is the last area code in Pennsylvania that has not been split or overlaid. The 814 NPA generally serves the central portion of Pennsylvania. The 814 NPA extends in a northerly direction towards the New York state border, in a westerly direction towards the Ohio state border, and in a southerly direction towards the Maryland state border. A few of the larger cities in the 814 NPA are Altoona, Erie, Johnstown, and State College; home of Penn State University.

The relief planning process for the 814 NPA started in 2002. On March 21, 2002, NANPA convened the industry to review relief alternatives. The industry reached consensus to recommend an all-services distributed overlay. However, due to the implementation of thousand-block pooling, the life of the 814 area code was lengthened. Consequently, the industry decided to delay filing the petition until the NRUF reports indicated a more immediate need for relief.

The April 2009 NRUF Report indicated exhaust of the 814 NPA would be third quarter of 2012. The industry met on April 19, 2009 and decided to file the petition for relief with the Pennsylvania Public Utility Commission ("PUC"). The petition was subsequently filed on June 9, 2009.

An Order entered July 29, 2009, the Pennsylvania PUC denied the industry's recommendation for relief and requested written comments from interested parties on the five relief alternatives that were presented in the Initial Planning Document. Furthermore, the Order entered December 17, 2010, by the Pennsylvania Public Utility Commission in Docket P-2009-2112925, the Commission ordered an area code split of the 814 NPA. Following the order of the area code split, the Commission received numerous petitions for reconsideration of their decision. By Order entered January 13, 2011, the Commission granted the petitions for reconsideration.

In a subsequent Order entered April 26, 2012, Docket No. P-2009-2112925, the Commission stated that due to conservation measures and a decrease in demand of NXX codes in the 814 NPA, the need for relief was no longer necessary. The petition filed by Neustar on June 9, 2009 was dismissed, and the December 7, 2010, Order implementing a geographic split was rescinded.

CO Code Summary:

As of June 6, 2018, the 814 NPA has 736 codes assigned, 38 codes available for assignment and 26 Unavailable codes. There are 54 service provider OCNs that are code holders in the 814 NPA, and 3 service provider OCNs that are only one-thousand-block holders in the NPA.

CO Code Assignment History:

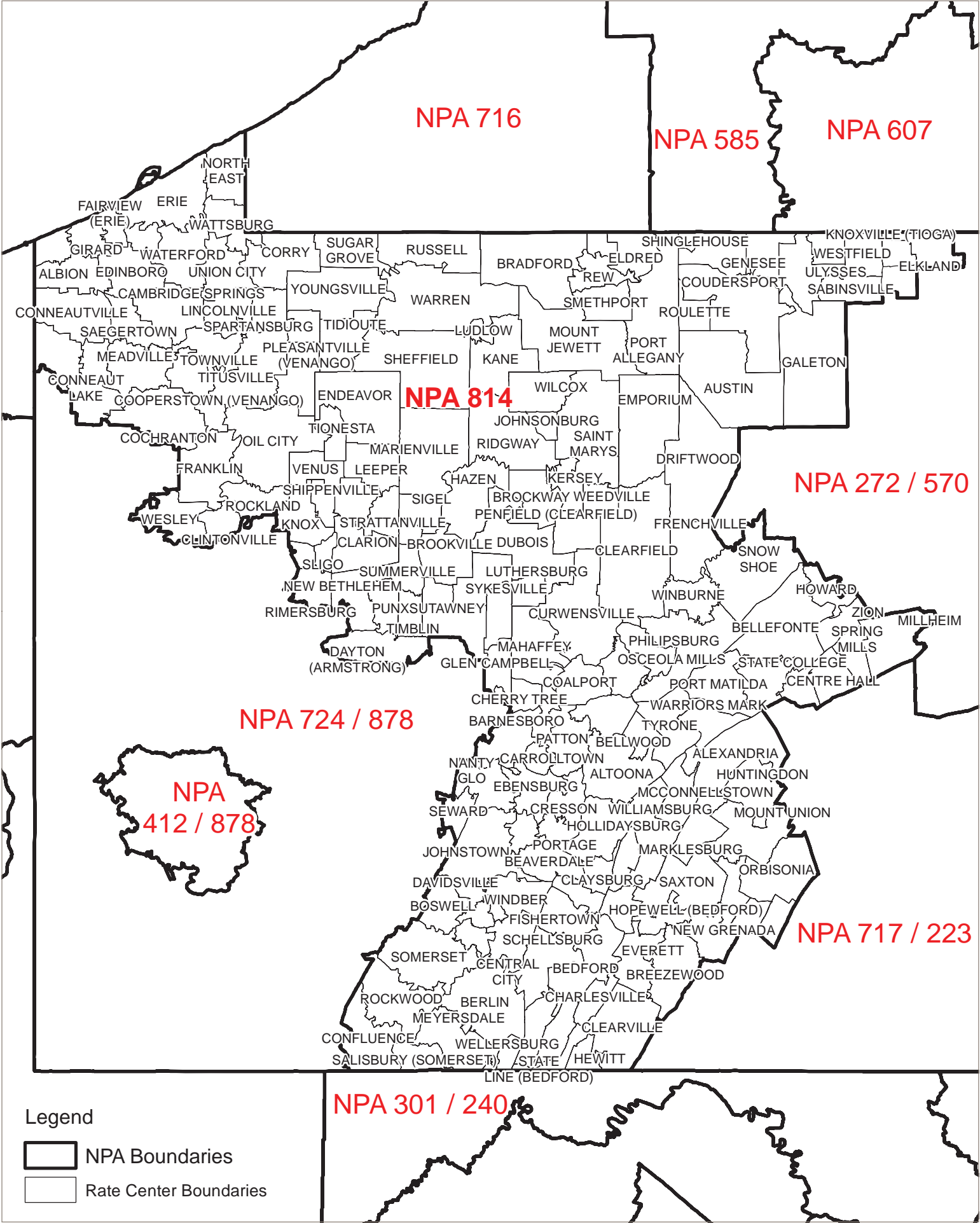
There were 5 total codes assigned YTD as of June 6, 2018, 8 codes assigned in 2017, 16 assigned in 2016; 13 assigned in 2015; and 3 assigned in 2014.

Exhaust Forecast:

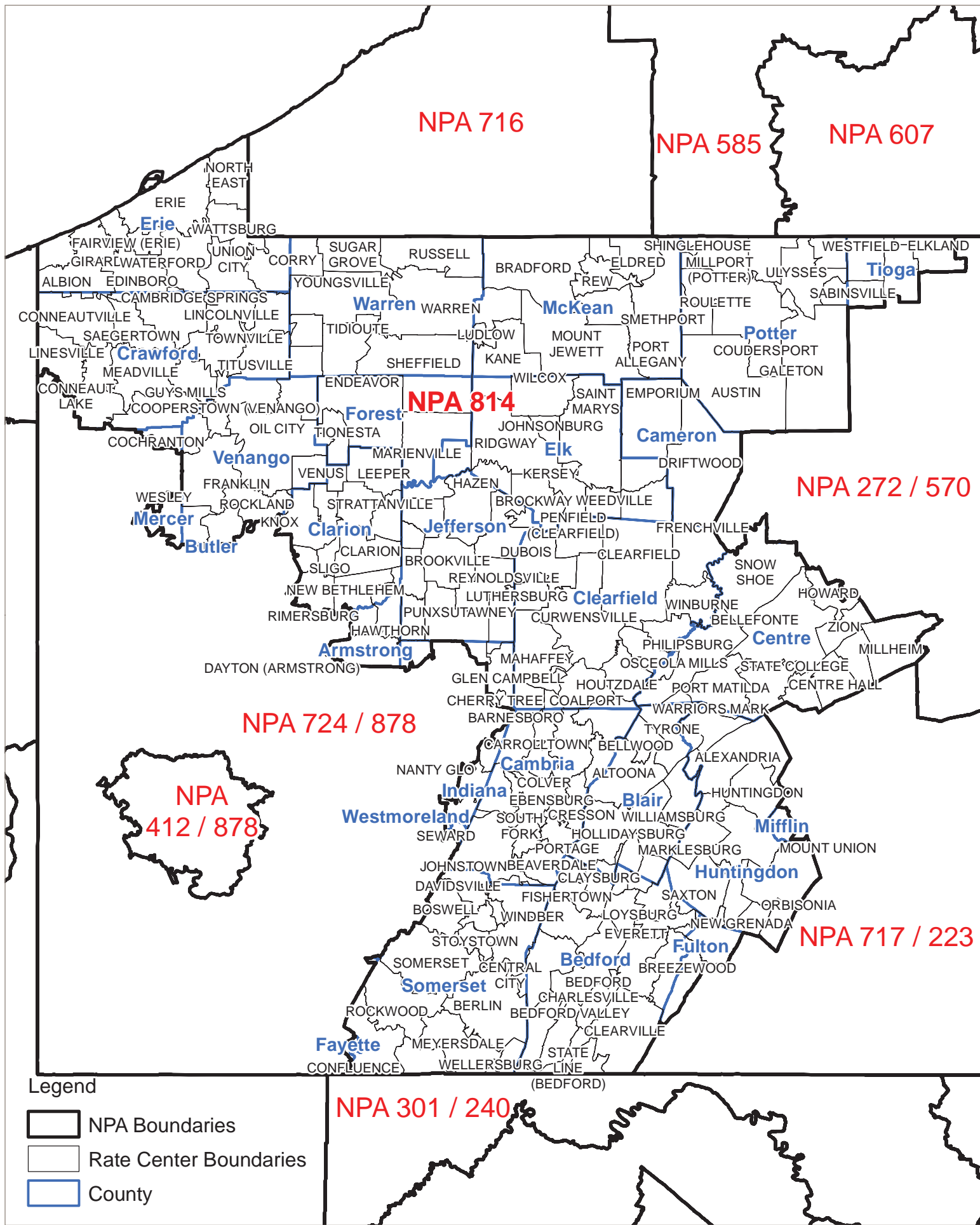
The April 2018 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“2018 NRUF Report”), published by NANPA, indicates that the 814 NPA will exhaust during the second quarter of 2021. Relief planning for an additional NPA is to start in 2Q2018.

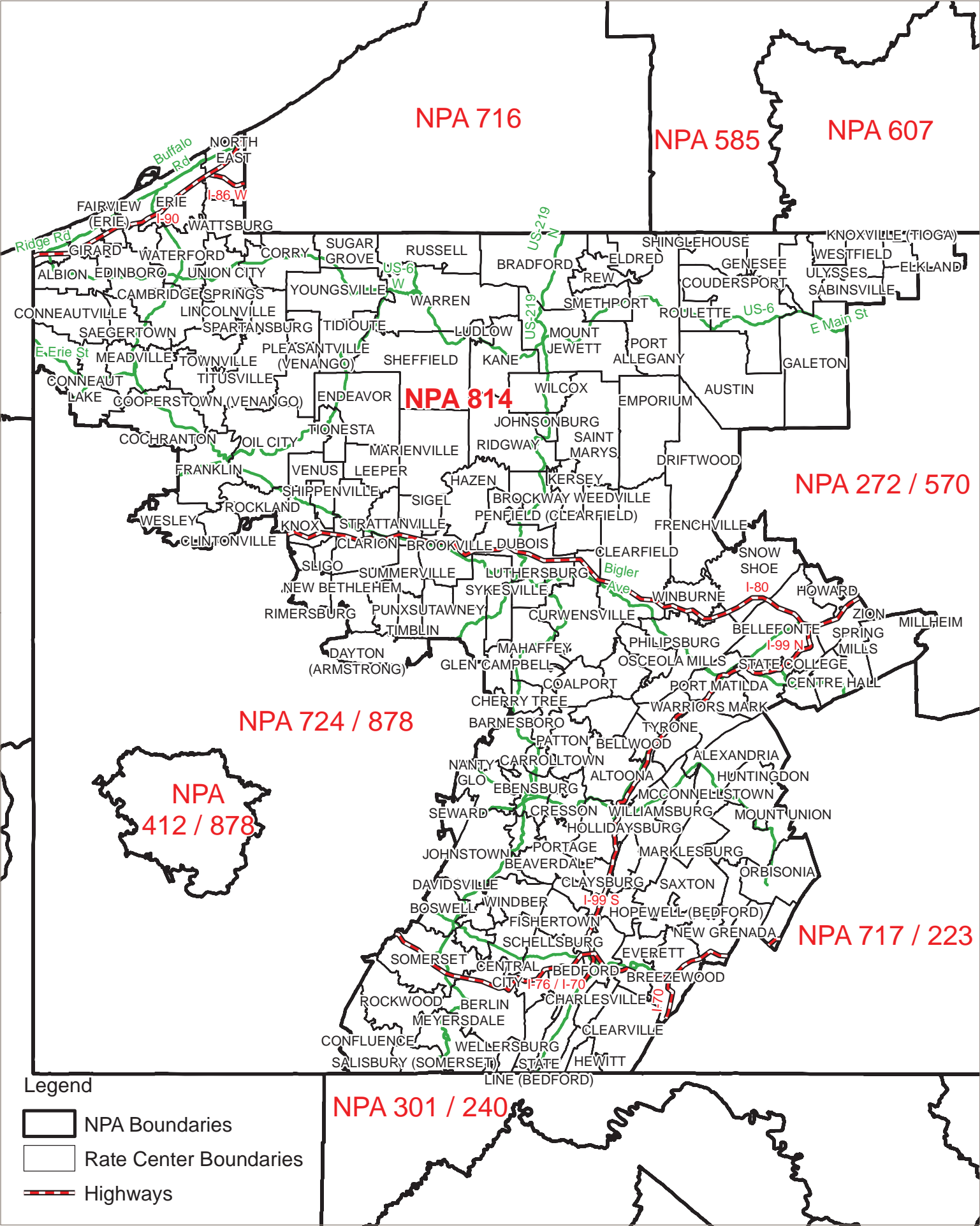
PENNSYLVANIA AREA CODE MAP











Pennsylvania
NPA 814 NXX Summary
Data as of 6/6/18

<u>NPA</u>	<u>814</u>					
Assigned NXXs	736					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	26	See Note				
Available NXXs	38					
Total	800					
<u>Codes Assigned NPA 814</u>	<u>Jan-14</u>	<u>Feb-14</u>	<u>Mar-14</u>	<u>Apr-14</u>	<u>May-14</u>	<u>Jun-14</u>
	1	0	0	0	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>
	0	1	0	0	1	0
	<u>Jan-15</u>	<u>Feb-15</u>	<u>Mar-15</u>	<u>Apr-15</u>	<u>May-15</u>	<u>Jun-15</u>
	2	0	5	3	0	1
	<u>Jul-15</u>	<u>Aug-15</u>	<u>Sep-15</u>	<u>Oct-15</u>	<u>Nov-15</u>	<u>Dec-15</u>
	1	1	0	0	0	0
	<u>Jan-16</u>	<u>Feb-16</u>	<u>Mar-16</u>	<u>Apr-16</u>	<u>May-16</u>	<u>Jun-16</u>
	1	1	0	2	0	0
	<u>Jul-16</u>	<u>Aug-16</u>	<u>Sep-16</u>	<u>Oct-16</u>	<u>Nov-16</u>	<u>Dec-16</u>
	2	2	7	1	0	0
	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	<u>Apr-17</u>	<u>May-17</u>	<u>Jun-17</u>
	0	1	0	1	1	2
	<u>Jul-17</u>	<u>Aug-17</u>	<u>Sep-17</u>	<u>Oct-17</u>	<u>Nov-17</u>	<u>Dec-17</u>
	0	0	0	1	1	1
	<u>Jan-18</u>	<u>Feb-18</u>	<u>Mar-18</u>	<u>Apr-18</u>	<u>May-18</u>	<u>Jun-18</u>
	1	3	0	1	0	0*
*As of June 6, 2018						
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).						

<div> <div>POOLING STATISTICS</div> <div>Provided By: Cecilia McCabe</div> </div>	
ST/NPA:	PA 814
MEETING DATE:	7/12/2018
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)	11/6/2002
RATE CENTERS	
<i># Total</i>	178
<i># Mandatory</i>	177
<i># Mandatory-Single Service Providers (M*)</i>	1
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	147
<i>(For time period 6/01/2017- 4/30/2018)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	1813
<i>(As of preparation date: 4/30/2018)</i>	
CODES ASSIGNED	
<i># Total</i>	10
<i># for Pool Replenishment</i>	6
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	4
<i>(For time period 6/01/2017- 4/30/2018)</i>	
CODES FORECASTED	
<i># Total</i>	12
<i># for Pool Replenishment and Dedicated Customers</i>	12
<i># for LRNs</i>	0
<i>(For the next twelve months as of 4/30/2018,</i>	

STATE: PENNSYLVANIA

NPA: 814

OCN DATA DATED: April 3, 2018

NPA Complex	OCN	Company
814	002F	BANDWIDTH.COM CLEC, LLC - PA
814	0149	FRONTIER COMMUNICATIONS OF BREEZEWOOD, LLC
814	0169	VERIZON NORTH INC.-PA
814	0170	VERIZON NORTH INC.-PA (CONTEL)
814	0176	WINDSTREAM PENNSYLVANIA, INC.
814	0194	FRONTIER COMMUNICATIONS OF OSWAYO RIVER, LLC
814	0195	ARMSTRONG TELEPHONE CO. - NORTH
814	0209	UNITED TEL CO. OF PENNSYLVANIA DBA CENTURYLINK
814	0210	VENUS TELEPHONE CORP
814	031G	TIME WARNER CABLE INFORMATION SVCS (PA), PA
814	073H	TELNYX LLC
814	078H	MOSAIC NETWORKX LLC - PA
814	129D	BROADVOX-CLEC, LLC - PA
814	197D	VONAGE NETWORK INC.
814	213C	IDT AMERICA CORP - PA
814	2514	US LEC OF PENNSYLVANIA, INC.
814	2681	WINDSTREAM COMMUNICATIONS, INC. - PA
814	283E	YMAX COMMUNICATIONS CORP. - PA
814	3609	FIBERNET TELECOMMUNICATIONS OF PENNSYLVANIA LLC PA
814	3806	CORE COMMUNICATIONS, INC. - PA
814	4007	LEVEL 3 COMMUNICATIONS, LLC - PA
814	4024	CHOICE ONE COMMUNICATIONS, INC. - PA
814	4036	NEW CINGULAR WIRELESS PCS, LLC - DC
814	4114	WINDSTREAM D & E SYSTEMS, INC. - PA
814	422C	ARMSTRONG TELECOMMUNICATIONS, INC. - PA
814	4527	MOBILE COMMUNICATION SERVICE, INC.
814	5338	BUFFALO-LAKE ERIE WIRELESS SYSTEMS CO., LLC
814	547E	NEUTRAL TANDEM-PENNSYLVANIA, LLC - PA
814	551G	365 WIRELESS, LLC
814	6063	COMCAST PHONE OF PENNSYLVANIA, LLC - PA
814	6286	UNITED STATES CELLULAR CORP. - PENNSYLVANIA
814	6392	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - PA
814	6529	T-MOBILE USA, INC.
814	6534	NEW CINGULAR WIRELESS PCS, LLC - IL
814	657B	CITYNET PENNSYLVANIA, LLC - PA
814	6630	USA MOBILITY WIRELESS, INC.
814	6664	SPRINT SPECTRUM L.P.
814	6701	AERIAL COMMUNICATIONS
814	6711	RCC OF PENNSYLVANIA DBA BEEPER RENTAL SERVICE
814	6739	SCHUYLKILL MOBILE FONE, INC.
814	6846	D&E/OMNIPOINT WIREL JOINT VENT LP DBA PCS ONE
814	6921	LIMITLESS MOBILE, LLC
814	7237	TELCOVE OF PENNSYLVANIA, INC. - PA

814	7309	TCG NEW JERSEY, INC. - PA
814	7421	AT&T LOCAL
814	7434	MCI WORLDCOM COMMUNICATIONS, INC. - PA
814	7575	CENTURYLINK COMMUNICATIONS LLC
814	7978	INTERMEDIA COMMUNICATIONS INC. - PA
814	8458	SPRINT SPECTRUM L.P.- PA
814	9208	VERIZON PENNSYLVANIA, INC.
814	939H	COMMIO, LLC
814	9475	AMERICELL PA-3 LIMITED PARTNERSHIP
814	967E	PEERLESS NETWORK OF PENNSYLVANIA, LLC - PA

ONE-THOUSAND BLOCK HOLDERS IN THE 814 NPA THAT DO NOT HAVE NXX CODES ASSIGNED

NPA Complex	OCN	Company
814	031D	INDIGO WIRELESS, INC.
814	5562	METRO PCS, INC.
814	7315	TELEPORT COMMUNICATIONS AMERICA, LLC - PA

STATE: PENNSYLVANIA

NPA: 814

RATE CENTER DATA DATED: June 1, 2018

Rate Center	CountOfNXX
ALBION	3
ALEXANDRIA	2
ALTOONA	46
AUSTIN	1
BARNESBORO	4
BEAVERDALE	2
BEDFORD	9
BEDFORDVLY	3
BELLEFONTE	14
BELLWOOD	2
BERLIN	2
BIG RUN	1
BOALSBURG	6
BOSWELL	2
BRADFORD	11
BREEZEWOOD	3
BROCKWAY	5
BROOKVILLE	5
CALLENSBG	2
CAMBDG SPG	2
CARROLLTN	2
CENTRAL CY	2
CENTREHALL	2
CHARLESVL	2
CHERRYTREE	1
CLARION	14
CLAYSBURG	2
CLEARFIELD	11
CLEARVILLE	2
CLINTONVL	3
COALPORT	2
COCHRANTON	2
COLVER	3
CONFLUENCE	3
CONNEAUTLK	5
CONNEAUTVL	3
COOPERSTN	1
CORRY	5
CORSICA	3
COUDERSPT	8
CRESSON	3
CURWENSVL	2
DAVIDSVL	2

DAYTON	1
DRIFTWOOD	2
DUBOIS	12
DUKECENTER	2
EBENSBURG	5
EDINBORO	4
ELDRED	2
ELKLAND	3
EMPORIUM	5
ENDEAVOR	1
ERIE	77
EVERETT	2
FAIRVIEW	3
FISHERTOWN	2
FRANKLIN	7
FRENCHVL	2
GALETON	3
GENESEE	1
GIRARD	3
GLASGOW	2
GLENCMPBLL	1
GRAND VLY	3
GUYS MILLS	3
HARRISNVLY	1
HASTINGS	1
HAWTHORN	2
HAZEN	2
HEWITT	1
HOLLIDYSBG	5
HOOVERSVL	1
HOPEWELL	2
HOUTZDALE	2
HOWARD	4
HUNTINGDON	10
HYNDMAN	2
JOHNSONBG	2
JOHNSTOWN	36
KANE	3
KERSEY	2
KNOX	2
KNOXVILLE	1
LEEPER	2
LINCOLNVL	2
LINESVILLE	3
LOYSBURG	3
LUDLOW	1
LUTHERSBG	2

MAHAFFEY	2
MARIENVL	2
MARKLESBG	5
MARTINSBG	2
MCKEAN	3
MCONELLSTN	3
MEADVILLE	15
MEYERSDALE	3
MILLHEIM	2
MILLPORT	2
MOUNTUNION	3
MT JEWETT	2
NANTY GLO	3
NEWBTHLHEM	3
NEWGRENADA	2
NORTH EAST	3
OIL CITY	13
ORBISONIA	2
OSCEOLA ML	1
OSTERBURG	2
PATTON	2
PENFIELD	2
PHILIPSBG	5
PLEASANTVL	3
PORTAGE	2
PT MATILDA	4
PTALLEGANY	2
PUNXSUTWNY	7
REW	2
REYNOLDSVL	4
RIDGWAY	5
RIMERSBURG	3
ROARINGSPG	3
ROCKLAND	3
ROCKWOOD	2
ROULETTE	2
RUSSELL	2
SABINSVL	1
SAEGERTOWN	4
SALISBURY	1
SAXTON	2
SHELLSBG	2
SEWARD	2
SHADE GAP	2
SHEFFIELD	3
SHINGLEHOS	2
SHIPPENVL	2

SIGEL	3
SLIGO	3
SMETHPORT	2
SNOW SHOE	2
SOMERSET	13
SOUTH FORK	2
SPARTANSBG	2
SPRING ML	2
ST MARYS	8
STATE LINE	2
STATECOLLG	29
STOYSTOWN	1
STRATTANVL	2
SUGARGROVE	2
SUMMERVL	2
SYKESVILLE	1
THREE SPG	3
TIDIOUTE	1
TIMBLIN	1
TIONESTA	2
TITUSVILLE	5
TOWNVILLE	4
TYRONE	3
ULYSSES	2
UNION CITY	2
VENUS	2
WARIRSMARK	3
WARREN	13
WATERFORD	2
WATTSBURG	1
WEEDVILLE	2
WELLERSBG	1
WESLEY	1
WESTFIELD	2
WILCOX	2
WILLIAMSBG	2
WINBURNE	2
WINDBER	2
WSPRINGFLD	4
YOUNGSVL	2
ZION	3

814 NPA - RELIEF ALTERNATIVES

PENNSYLVANIA

Numbering Plan Area Born on Date: January 1, 1947

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE..... April 2018
PROJECTED EXHAUST DATE.....2Q2021
ANNUALIZED CODE DEMAND PROJECTION.....14
MONTHLY CO CODE DEMAND PROJECTION.....1.15
NXX Assignment dataJune 6, 2018

CURRENT DIALING PLAN

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

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 814 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customer 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 814 NPA all future code assignments will be made in the overlay area code. A map is provided. The projected life would be:

Total CO Codes = 736
Total Rate Centers = 178
Area Code Life in Years = 67 Years

GEOGRAPHIC SPLIT ALTERNATIVE

In a geographic split a line is drawn along rate center boundaries of the current area code with rate centers on one side of the split line retaining the current area code and the rate centers of the other side of the split line changing to a new area code. Telephone numbers on both sides of the split line will retain seven-digit dialing. Calls dialed between the two resulting area codes will be on a 10-digit basis.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 814 area code is split by drawing a line along rate center boundaries as follows: The line starts at the New York border at the NPA boundary between the Eldred and Shinglehouse rate centers and heads south between Emporium and Driftwood and then southwest dividing Luthersburg and Curwensville and continues to the border of the 724/878 overlay complex. This split alternative is well balanced with a difference of three years in projected lives. No recommendation is made for which side of the split line would receive the new NPA.

The 75 rate centers inside Area B are as follows: Alexandria, Altoona, Austin, Barnesboro, Beaverdale, Bedford, Bellefonte, Bellwood, Berlin, Boswell, Breezewood, Carrolltown, Central City, Centre Hall, Charlesville, Cherry Tree, Claysburg, Clearfield, Clearville, Coalport, Confluence, Coudersport, Cresson, Curwensville, Driftwood, Ebensburg, Elkland, Everett, Fishertown, Frenchville, Galeton, Genesee, Glen Campbell, Hewitt, Hollidaysburg, Hopewell, Howard, Huntingdon, Johnstown, Knoxville, Mahaffey, Marklesburg, McConnellstown, Meyersdale, Millheim, Mount Union, Nanty Glo, Oil City, Orbisonia, Osceola Mills, Patton, Philipsburg, Portage, Port Matilda, Rockwood, Roulette, Sabinsville, Salisbury, Saxton, Schellsburg, Seward, Shinglehouse, Snow Shoe, Somerset, Spring Mills, State Line, State College, Tyrone, Ulysses, Warriors Mark, Wellersburg, Winburne, Windber, and Zion. The remaining 103 rate centers are in Area A.

Area A

Total CO Codes = 423

Total rate centers = 103

Area Code Life = 74 Years

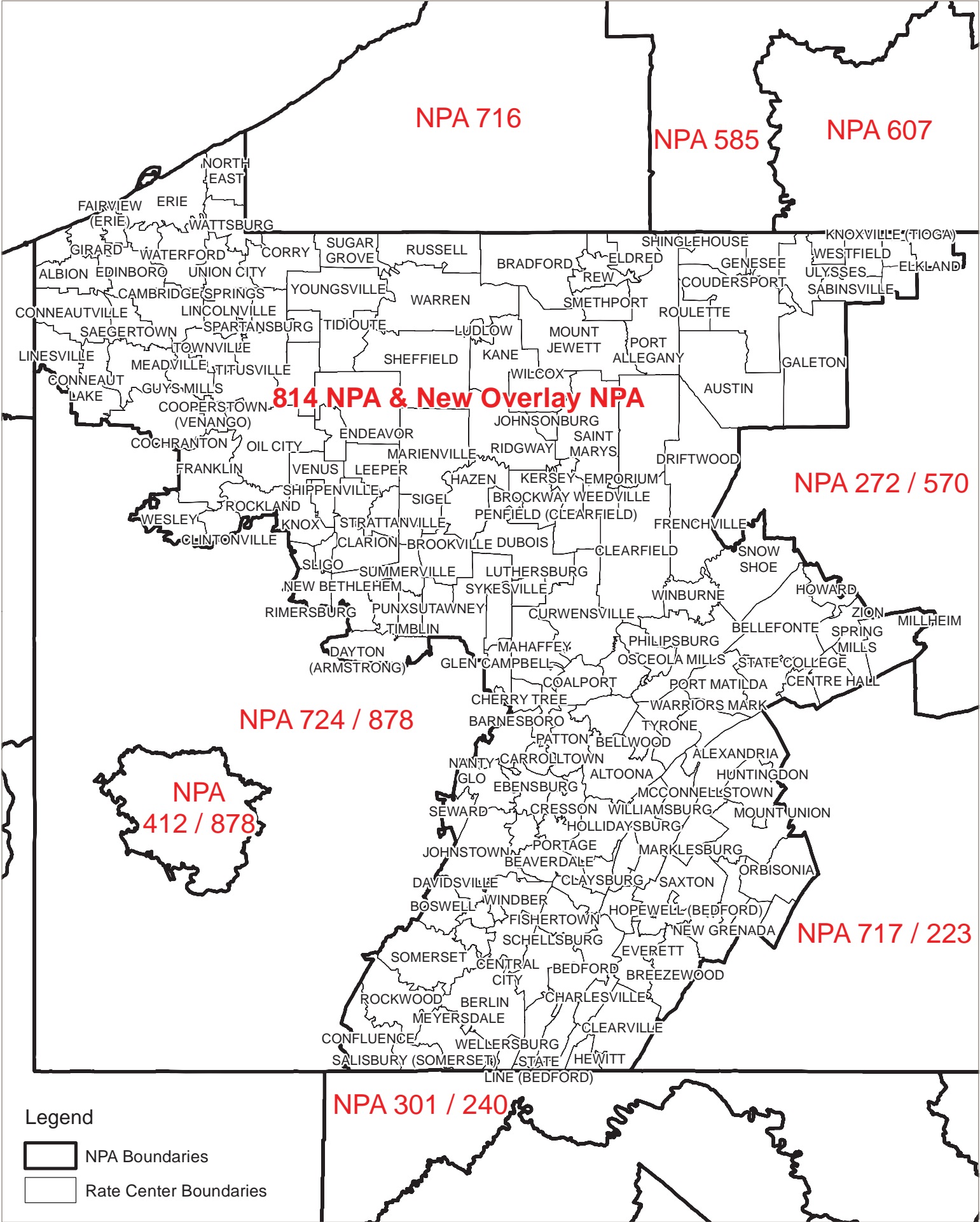
Area B

Total CO Codes = 339

Total rate centers = 75

Area Code Life = 71 Years

Pennsylvania NPA 814 Rate Center Map
Alternative #1 All Services Overlay



Pennsylvania NPA 814 Rate Center Map

Alternative #2 Geographic Split

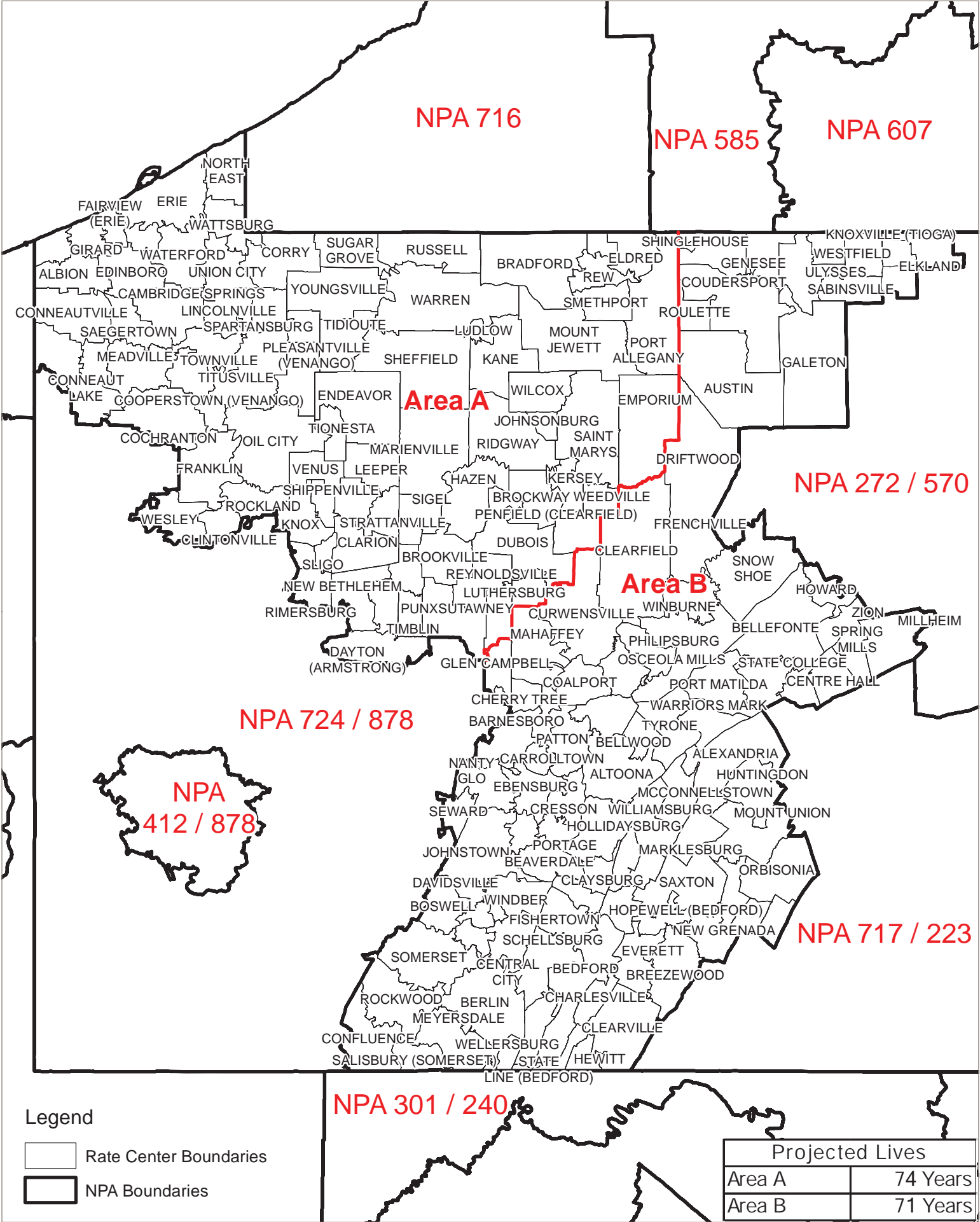


EXHIBIT B

August 15, 2018

To: All 814 NPA Code Holders and Other Industry Members (Pennsylvania)

Subject: Final Minutes of July 12, 2018 Initial Relief Planning Meeting

Attached are the final meeting minutes from the July 12, 2018, PA 814 NPA relief planning meeting. NANPA conducted a conference call to review and approve these minutes on August 9, 2018, and a minor edit was made. No later than August 23, 2018, NANPA will file the petition for relief of the 814 NPA using the meeting results reflected in these minutes.

Please feel free to contact me if you have any questions regarding any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on 571-434-5765 or via email at the address below.

Sincerely,

Heidi A. Wayman
NPA Relief Planner
NANPA
e-mail: heidi.wayman@team.neustar

C: Mark Lum – PA PUC Staff

Attachments

**PENNSYLVANIA 814 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
FINAL MINUTES
July 12, 2018**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Heidi then reviewed the agenda and NANPA’s roles and responsibilities.

NANPA’s ROLE AND RESPONSIBILITIES

Heidi 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 Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting – posted on NNS June 13, 2018.
- 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, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the Pennsylvania Public Utility Commission.
- Also determine any additional items to include in a filing with the Pennsylvania Public Utility Commission 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 comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today’s meeting per the INC guidelines (i.e., by August 23, 2018) or as decided by the industry or as required by the state statute.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

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

Heidi referred the participants to the relief planning meeting aids included in the IPD document: the Excerpts from the INC NPA Code Relief Planning & Notification Guidelines, and the Implementation Interval and Dialing Plan charts. Heidi has also included Population Counts and Projections from 2010-2017. These meeting aids will assist the participants in their decision making and to make a recommendation for relief.

The NPA Code Relief Planning & Notification Guidelines, as well as other relevant NPA assignment guidelines, may be downloaded from the ATIS web site at: (www.atis.org).

REVIEW INITIAL PLANNING DOCUMENT FOR THE 814 NPA

Heidi reviewed the Initial Planning Document (IPD) distributed on June 13, 2018.

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS:

The 814 NPA is one of the original four Pennsylvania NPAs assigned in 1947. It is the last area code in Pennsylvania that has not been split or overlaid. The 814 NPA generally serves the central portion of Pennsylvania. The 814 NPA extends in a northerly direction towards the New York state border, in a westerly direction towards the Ohio state border, and in a southerly direction towards the Maryland state border. A few of the larger cities in the 814 NPA are Altoona, Erie, Johnstown, and State College; home of Penn State University

The relief planning process for the 814 NPA started in 2002. On March 21, 2002, NANPA convened the industry to review relief alternatives. The industry reached consensus to recommend an all-services distributed overlay. However, due to the implementation of thousand-block pooling, the life of the 814 area code was lengthened. Consequently, the industry decided to delay filing the petition until the NRUF reports indicated a more immediate need for relief.

The April 2009 NRUF Report indicated exhaust of the 814 NPA would be third quarter of 2012. The industry met on April 19, 2009 and decided to file the petition for relief with the Pennsylvania Public Utility Commission ("PUC"). The petition was subsequently filed on June 9, 2009.

An Order entered July 29, 2009, the Pennsylvania PUC denied the industry's recommendation for relief and requested written comments from interested parties on the five relief alternatives that were presented in the Initial Planning Document. Furthermore, the Order entered December 17, 2010, by the Pennsylvania Public Utility Commission in Docket P-2009-2112925, the Commission ordered an area code split of the 814 NPA. Following the order of the area code split, the Commission received numerous petitions for reconsideration of their decision. By Order entered January 13, 2011, the Commission granted the petitions for reconsideration.

In a subsequent Order entered April 26, 2012, Docket No. P-2009-2112925, the Commission stated that due to conservation measures and a decrease in demand of NXX

codes in the 814 NPA, the need for relief was no longer necessary. The petition filed by Neustar on June 9, 2009 was dismissed, and the December 17, 2010 Order implementing a geographic split was rescinded.

CO CODE SUMMARY

As of July 11, 2018, the 814 NPA has 739 codes assigned, 36 codes available for assignment and 25 Un-Assignable codes. Year to date, there have been 8 assignments in 2018. (See Attachment #2)

The annual NXX code assignment history in the 814 NPA has been as follows:

2014 assignments: 3

2015 assignments: 13

2016 assignments: 16

2017 assignments: 8

2018 assignments: 8

NPA STATUS

Heidi informed participants that the April 2018 Number Resource Utilization Forecast (“NRUF”) projects the 814 NPA to exhaust during the 2nd Quarter 2021. The monthly CO Code demand projection is 1.15 codes per month (14 codes per year).

There are 57 service provider OCNs that are CO code and/or one-thousand block holders.

NUMBER POOLING INFORMATION

Linda Hymans, Neustar – Number Pooling Regulatory, reported that in the 814 NPA pooling commenced on November 6, 2002, there are 178 rate centers (RCs), 177 RCs are mandatory pooling, 1 rate centers are mandatory-single service providers, 0 rate centers are optional and 0 rate centers are excluded. For the time period of July 1, 2017 to July 11, 2018, 411 blocks have been assigned in the 814 NPA, and as of July 11, 2018 there are 1,575 blocks available for assignment to service providers. Pooling has assigned 11 codes in the same period, 6 for pool replenishment, 0 for dedicated customers and 5 for LRNs. The forecasted need for the next twelve months is 4 codes for pool replenishment and dedicated customers and none for LRNs. (See Attachment #3)

Heidi then briefly reviewed the following maps and related documents:

Map showing location of all NPAs in Pennsylvania

NPA 814 Rate Center Map

NPA 814 Rate Center & Cities Map

NPA 814 Rate Center & Counties Map

NPA 814 Rate Center & Highways Map

Code Holder Table for 814 NPA

Rate Center Table for 814 NPA

EXPLANATION OF RELIEF ALTERNATIVE PREPARED BY NANPA

Heidi reviewed the following recommended relief alternatives and the associated maps in the Planning Document:

OVERLAY ALTERNATIVE

ALTERNATIVE #1 –ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 814 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 814 NPA all future code assignments will be made in the overlay area code. A map is provided. The projected life would be:

Total CO Codes = 736
Total Rate Centers = 178
Area Code Life in Years = 67

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 814 area code is split by drawing a line along rate center boundaries as follows: The line starts at the New York border at the NPA boundary between the Eldred and Shinglehouse rate centers and heads south between Emporium and Driftwood and then southwest dividing Luthersburg and Curwensville and continues to the border of the 724/878 overlay complex. This split alternative is well balanced with a difference of three years in projected lives. No recommendation is made for which side of the split line would receive the new NPA.

The 75 rate centers inside Area B are as follows: Alexandria, Altoona, Austin, Barnesboro, Beaverdale, Bedford, Bellefonte, Bellwood, Berlin, Boswell, Breezewood, Carrolltown, Central City, Centre Hall, Charlesville, Cherry Tree, Claysburg, Clearfield, Clearville, Coalport, Confluence, Coudersport, Cresson, Curwensville, Driftwood, Ebensburg, Elkland, Everett, Fishertown, Frenchville, Galeton, Genesee, Glen Campbell, Hewitt, Hollidaysburg, Hopewell, Howard, Huntingdon, Johnstown, Knoxville, Mahaffey, Marklesburg, McConnellstown, Meyersdale, Millheim, Mount Union, Nanty Glo, Oil City, Orbisonia Osceola Mills, Patton, Philipsburg, Portage, Port Matilda, Rockwood, Roulette, Sabinsville, Salisbury, Saxton, Schellsburg, Seward, Shinglehouse, Snow Shoe, Somerset, Spring Mills, State Line, State College, Tyrone, Ulysses, Warriors Mark, Wellersburg, Winburne, Windber, and Zion. The remaining 103 rate centers are in Area A.

Area A
Total CO Codes = 423
Total rate centers = 103
Area Code Life = 74 Years

Area B
Total CO Codes = 339
Total rate centers = 75
Area Code Life = 71 Years

ADDITIONAL RELIEF ALTERNATIVE SUGGESTIONS

Heidi sought ideas for additional alternatives. There were no additional suggestions.

DISCUSSION OF PROS AND CONS OF RELIEF ALTERNATIVES

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

The following Pros and Cons were listed for Alternative # 1 (All-Services Overlay)

Pros:

1. All existing customers would retain the 814 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. Less customer confusion and easier education process.
4. Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
5. Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
6. Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth.
7. No need for synchronization of old and new NPAs in NPAC databases.
8. Minimizes call routing issues, especially with ported numbers.
9. Easier for service providers to implement from a translations, billing and service order system perspective.
10. Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table.
11. The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
12. Keeps communities of interest intact.
13. No impact on some wireless carriers that have to reprogram handsets manually.
14. No technical impacts to number portability, text messaging or multimedia messaging.

Cons:

1. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 814 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 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.

The following Pros and Cons were listed for Alternative # 2 (Geographic Split)

Pros:

1. Maintains seven digit dialing for local calls within the same NPA.

2. Approximately ½ of customers would experience no change if they keep the 814 NPA.
3. Projected lives are balanced.

Cons:

1. Requires approximately ½ of 814 NPA customers to change their area code, thus creating winners and losers.
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.
3. Difficult PSC/PUC decision on which side retains the old NPA.
4. Longer time period needed for service providers to implement this type of relief.
5. Customers whose numbers change must contact friends, family and business associates with the telephone changes.
6. More complicated and costly to implement for service providers in their billing, translations and database systems.
7. Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
8. Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
9. Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
10. Split requires significant challenges to service provider's operational support systems and network elements.
11. Splits cause customer confusion with caller ID during implementation.
12. Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
13. Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
14. Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
15. Splits require the 800/SMS database to be updated.
16. Splits reduce the geographic area served by one area code.
17. Splits communities of interest.
18. 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 ALTERNATIVE

After discussion and review of the above listed Pros and Cons, a proposal was made and consensus reached to eliminate Alternative #2 (Geographic Split) due to the cons listed above.

CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION

After removal of Alternative #2, a proposal was made and consensus was reached to recommend Alternative #1, the all-services distributed overlay to the Pennsylvania Public Utility Commission as the industry's choice of relief for the 814 NPA.

DIALING PLAN

OVERLAY DIALING PLAN FOR ALTERNATIVE #1

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

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

ESTABLISH IMPLEMENTATION SCHEDULE

In connection with this issue, the INC guidelines state that NANPA should recommend mandatory dialing start 6-months prior to the forecasted exhaust of 2Q2021 - **which would be in 4Q2020.**

A recommendation was made and consensus reached to recommend to the Pennsylvania PUC a 13-month schedule for implementation of the overlay shown with the interval periods listed below. Rather than tied to the decision date, the implementation dates are to be consistent with the overall 13-month time period. The recommended schedule is as follows:

Interval Timeframes and Dates for Alternative #1 – All-Services Distributed Overlay:

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within 814 NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period (Effective date for codes from the new NPA)	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

STATEMENTS FOR THE RECORD

There were no statements for the record.

REVIEW OF DRAFT MEETING MINUTES

Heidi stated that the draft minutes resulting from this meeting will be distributed to the industry via the NANP Notification Service (NNS) no later than July 26, 2018 and the draft relief petition will be distributed to the industry no later than August 2, 2018. It was agreed that NANPA will conduct a conference call to review and approve the draft minutes and approve the draft petition to the Pennsylvania PUC on August 9, 2018. NANPA will file the relief petition with the Pennsylvania PUC no later than August 23, 2018.

Details of the call are as follows:

Date: Thursday, August 9, 2018

Time: 8 AM Pacific; 9 AM Mountain; 10 AM Central; 11 AM Eastern;

Dial-in number: 630-827-6799

Pass code: 8831 535#

Adjourned

#

These minutes became final on August 9, 2018 with minor edits.

PENNSYLVANIA – 814 NPA
Initial Relief Planning Meeting via Conference Call
Meeting Attendees
July 12, 2018

NAME	COMPANY
Sharon Poer	AT&T
Rita Schmitz	CenturyLink
Allyson Blevins	Charter
Mark Lum	PA PUC
Al Cipparone	NANPA Relief Planning
Heidi Wayman	NANPA Relief Planning
Beth Sprague	NANPA
Cecilia McCabe	Neustar Pooling Imp
Linda Hymans	Neustar Pooling Regulatory
Shaunna Forshee	Sprint
Cherry Hill	T-Mobile
Sarah Halko	Telnyx
Kathy Bonette	Verizon
Laura Dalton	Verizon
Teri Rico	Verizon

Pennsylvania
NPA 814 NXX Summary
Data as of 7/11/18

Attachment 2

<u>NPA</u>	<u>814</u>					
Assigned NXXs	739					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	25	See Note				
Available NXXs	36					
Total	800					
<u>Codes Assigned NPA 814</u>	<u>Jan-14</u>	<u>Feb-14</u>	<u>Mar-14</u>	<u>Apr-14</u>	<u>May-14</u>	<u>Jun-14</u>
	1	0	0	0	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>
	0	1	0	0	1	0
	<u>Jan-15</u>	<u>Feb-15</u>	<u>Mar-15</u>	<u>Apr-15</u>	<u>May-15</u>	<u>Jun-15</u>
	2	0	5	3	0	1
	<u>Jul-15</u>	<u>Aug-15</u>	<u>Sep-15</u>	<u>Oct-15</u>	<u>Nov-15</u>	<u>Dec-15</u>
	1	1	0	0	0	0
	<u>Jan-16</u>	<u>Feb-16</u>	<u>Mar-16</u>	<u>Apr-16</u>	<u>May-16</u>	<u>Jun-16</u>
	1	1	0	2	0	0
	<u>Jul-16</u>	<u>Aug-16</u>	<u>Sep-16</u>	<u>Oct-16</u>	<u>Nov-16</u>	<u>Dec-16</u>
	2	2	7	1	0	0
	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	<u>Apr-17</u>	<u>May-17</u>	<u>Jun-17</u>
	0	1	0	1	1	2
	<u>Jul-17</u>	<u>Aug-17</u>	<u>Sep-17</u>	<u>Oct-17</u>	<u>Nov-17</u>	<u>Dec-17</u>
	0	0	0	1	1	1
	<u>Jan-18</u>	<u>Feb-18</u>	<u>Mar-18</u>	<u>Apr-18</u>	<u>May-18</u>	<u>Jun-18</u>
	1	3	0	1	0	3
	<u>Jul-18</u>					
	0*					
*As of July 11, 2018						
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 814
MEETING DATE:	7/12/2018
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)	11/6/2002
RATE CENTERS	
<i># Total</i>	178
<i># Mandatory</i>	177
<i># Mandatory-Single Service Providers (M*)</i>	1
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	411
<i>(For time period 7/01/2017- 7/11/2018)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	1575
<i>(As of preparation date: 7/11/2018)</i>	
CODES ASSIGNED	
<i># Total</i>	11
<i># for Pool Replenishment</i>	6
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	5
<i>(For time period 7/01/2017- 7/11/2018)</i>	
CODES FORECASTED	
<i># Total</i>	4
<i># for Pool Replenishment and Dedicated Customers</i>	4
<i># for LRNs</i>	0
<i>(For the next twelve months as of 7/11/2018)</i>	