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|  | **PENNSYLVANIA**  **PUBLIC UTILITY COMMISSION**  **Harrisburg, PA 17105-3265** |  |

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|  | Public Meeting held April 30, 2020 |
| Commissioners Present: |  |

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| Gladys Brown Dutrieuille, Chairman | | |
| David W. Sweet, Vice Chairman | | |
| John F. Coleman, Jr. | |
| Ralph V. Yanora | |
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| Somos, Inc., in its Role as North American  Numbering Plan Administrator  Petition for Approval of Numbering Plan  Area Relief Planning for the 814 NPA | Docket No. P-2018-3004265 |

**ORDER**

**BY THE COMMISSION:**

In this order, the Commission revisits the issue of area code exhaust and the implementation of relief to address such exhaust. On August 23, 2018, the North American Numbering Plan Administrator (NANPA),[[1]](#footnote-2) Somos, Inc.,[[2]](#footnote-3) in its role as the neutral third-party Numbering Plan Area Relief Planner for Pennsylvania, acting on behalf of the Pennsylvania telecommunications industry (Industry) filed a petition with the Commission requesting approval of the Industry’s area code relief plan for the 814 Numbering Plan Area (“NPA” or “area code”) (814 Petition). According to the 814 Petition, the April 2018 Numbering Resource Utilization Forecast (NRUF)[[3]](#footnote-4) and NPA Exhaust Analysis (2018 NRUF Report) projected that absent NPA numbering relief, 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.[[4]](#footnote-5) Based on this information, the Industry reached a consensus[[5]](#footnote-6) to implement an all-services distributed overlay for the geographic area covered by the 814 NPA, which would create a new area code to service the area.

The Federal Communications Commission (FCC), which has plenary jurisdiction over numbering issues in the United States,[[6]](#footnote-7) mandates that states must implement timely area code relief, i.e., add a new area code, when the area codes within their boundaries are about to exhaust their supply of NXX codes.[[7]](#footnote-8) The Commission, therefore, is now faced with deciding when and in what form a new area code must be added. As stated earlier, the NANPA filed the 814 Petition requesting approval of the Industry’s recommended plan to alleviate the numbering exhaust for the 814 NPA.

**Discussion**

1. **FCC Requirements Regarding Area Code Relief**

Numbering exhaust for an area code is the result of the increasing unavailability of telephone numbers for end-users. When the number of NXX codes in an NPA becomes scarce due to demand from service providers seeking to assign available telephone numbers to their customers, then a new area code needs to be opened. Thus, new area codes are needed when existing area codes are about to exhaust their supply of NXX codes.[[8]](#footnote-9) The system for allocating numbering resources was designed in 1947 to accommodate a monopoly system. In recent years, however, a combination of several factors has created an unprecedented demand for NXX codes leading to the exhaustion of existing area codes and the proliferation of new area codes to fill the void.

According to FCC regulations, new area codes can be introduced to relieve the shortage of NXX codes in an area code through the use of any of the following three methods:

1. A geographic area code split, which occurs when the geographic area served by an area code is split into two or more geographical parts;
2. An area code boundary realignment, which occurs when the boundary lines between two adjacent area codes are shifted to allow the transfer of some numbers from one area code to the other;

3. An area code overlay, which occurs when a new area code is introduced to serve the same geographic area as an existing area code.

*See* 47 C.F.R. § 52.19(c)(1)-(3)

Although the NANPA notifies the Industry when an area code needs relief planning and conducts the relief planning meeting, it is a neutral third-party that does not express an opinion on any proposed relief alternative. Additionally, the Industry is encouraged to participate in the creation of the relief alternatives and is free to present any plans during the relief planning meeting.

**II. NANPA’s NPA Relief Planning for the 814 NPA**

1. **The Relief Planning Meeting for the 814 NPA**

Between 1940 and 1990, Pennsylvania had a total of only four area codes (412, 814, 717 and 215). The 814 NPA is one of the original area codes assigned in 1947. 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.

The 814 NPA is the only Pennsylvania area code that has not yet experienced any area code relief. However, this is not the first instance that the 814 NPA has experienced a shortage of numbering resources. A numbering relief planning process for the 814 NPA started in 2002. On March 21, 2002, NANPA convened the Industry to review alternatives for numbering relief for the 814 NPA. The Industry reached consensus to recommend an all-services distributed overlay. However, due to the implementation of thousand-block pooling at that time the life of the 814 area code was lengthened. Consequently, the Industry decided to delay filing an area code relief petition until the

NRUF reports indicted a more immediate need for relief.

Subsequently, the April 2009 NRUF Report indicated that the 814 NPA would exhaust during the third quarter of 2012. The Industry met on April 19, 2009 and decided to file the petition for relief with the Commission. NANPA filed a Numbering Exhaust Petition on June 9, 2009 at Docket No. P-2009-2112925. By Order entered 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 attached to the Numbering Exhaust Petition. Thereafter, by Order entered December 17, 2010 at the same docket, the Commission ordered an area code split of the 814 NPA. Numerous petitions for reconsideration were filed to the December 17, 2010 Order. The Commission granted the petitions for reconsideration by Order entered January 12, 2011.

In a subsequent Order entered April 26, 2012, the Commission stated that due to additional conservation measures and a decrease in demand for NXX codes in the 814 NPA, the need for area code relief was no longer necessary. Accordingly, the Commission dismissed NANPA’s June 9, 2009 Petition and rescinded its December 17, 2010 Order implementing a geographic split.

Thereafter, the April 2018 NRUF data indicated that based upon NANPA’s area code forecast projections, the supply of NXX codes for the 814 NPA will exhaust during

the second quarter of 2021 absent numbering relief.[[9]](#footnote-10) Consequently, NANPA started the

instant relief planning process thirty-six months prior to the anticipated exhaust of the 814 NPA in the second quarter of 2021,[[10]](#footnote-11) by organizing an initial relief planning meeting with the Industry, which was held via conference call on July 12, 2018. The Industry discussed various alternatives during that conference call. Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (IPD) to the Industry prior to the relief planning meeting. The IPD contained a meeting aid, issues to be considered during the NPA relief planning, pros and cons for relief alternatives, dialing plans and implementation intervals, NXX Code assignment information, thousand-block pooling statistics and an illustrative map of the overlay.[[11]](#footnote-12)

During the relief planning meeting, the Industry members discussed the relief alternatives proposed for the 814 NPA described more fully below and set forth in Appendix B:

* Alternative #1 – All Services Distributed Overlay: The proposed 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. However, ten-digit 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. When 814 NPA exhausts, all CO code assignments will be made from the new overlay area code.
* Alternative #2 – geographic split: The 814 area code is split by drawing a line along rate centers 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 split of three years in projected lives. No recommendation is made for which side of the split line

would receive the new NPA. The Industry reached consensus that Alternative #2 should be removed from consideration primarily due to concerns regarding the burdens that a geographic split places on consumers and businesses that must change their telephone numbers with the split.

The Industry 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. Consistent with FCC regulations, this relief plan would require 10-digit dialing for all local calls within and between the 814 NPA and the new NPA.[[12]](#footnote-13) The Industry recommended 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:

**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  Credit card, collect, third party | HNPA or FNP | 0+10 digits (0+NPA-NXX-XXXX |

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

Industry participants also reached consensus to recommend to the Commission a 13-month schedule for implementation of the overlay. The Industry asserted that adhering to the proposed timeframe would avoid the denial or delay of service to telecommunication

service providers’ customers due to the unavailability of NXX codes. The recommended implementation schedule is as follows:

**Recommended Implementation Schedule for All Services DistributedOverlay**

|  |  |
| --- | --- |
| **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  *(Effective date for codes from the new NPA)* | 1 month (after Mandatory Dialing Period) |
| Total Implementation Interval | 13 months |

**Discussion**

The FCC has adamantly maintained that state commissions cannot engage in number conservation measures to the exclusion of, or as a substitute for, timely area code relief.[[13]](#footnote-14) Therefore, when Pennsylvania’s area codes are about to exhaust their supply of NXX codes, the Commission must implement timely area code relief, *i.e.*, add a new area code. When faced with the need to implement new area codes, the Commission must decide two very important issues. First, the Commission must decide how to implement the new area code (i.e., a geographic split or an overlay). Second, the Commission must determine the timeframe for implementing the new area code. As discussed earlier, the Industry recommended an all-service distributed overlay as the numbering relief plan for the 814 NPA.

**A**. **Form of Area Code Relief for the 814 NPA**

Once NANPA has determined that area code relief is necessary, state commissions are faced with the task of deciding what form that relief should take.[[14]](#footnote-15) According to the FCC, state commissions must add new area codes when the existing area codes exhaust or are about to exhaust all their NXX codes. As stated earlier, the overlay of the 814 NPA was the only option presented for area code relief.

Pennsylvania has experienced both area code splits and overlays. However, since 1999, only overlays have been implemented as the form of area code relief for Pennsylvania’s NPAs, i.e., all services overlays were used to implement the 484, 267, 878, 223 and 445 area codes. Prior to 1999, three geographic splits have been implemented, creating the 610, 570 and 724 area codes. There are benefits and disadvantages to either method. With the imposition of an overlay, existing land-based telephone customers do not have to change telephone numbers. Therefore, customers will not need to change their advertising and stationery. However, the FCC requires that ten digits be used to dial all numbers in the overlaid area when an overlay is implemented.[[15]](#footnote-16) Thus, seven-digit dialing is no longer permissible or valid. New numbers from the new area code are assigned to service providers that do not have numbers available in a given rate center. Therefore, when an overlay is activated, the first three digits of a ten-digit telephone number for next door neighbors may be different if a telephone number was obtained from the new area code.

On the other hand, implementation of a geographic split involves dividing an existing area code into two or more parts, with one part retaining the old area code and other(s) receiving the new area code(s). Callers are presently able to continue using seven-digit dialing for calls made within the area code boundaries. Customers in the area retaining the old area code are minimally impacted. Customers in the new area code, however, must change their area codes. Businesses must revise their stationery and their advertising. Commercial customers may not be able to retain ''vanity numbers,'' upon which they have spent advertising dollars. Callers, particularly at the border of the old and new area codes are temporarily inconvenienced. They often must dial ten digits to make calls that were previously seven-digit numbers. Although local calling areas actually have not changed and calls that were local before the area code split remain local calls, even if they cross into the new area code, people are initially disconcerted and distrusting of the concept of an eleven-digit local call. Indeed, local calling areas do not change no matter which method of area code relief is implemented.

The Commission agrees with the Industry’s recommendation to implement an

all-services distributed overlay as the numbering relief plan to remedy the numbering resource exhaust in the 814 NPA. It would not be appropriate to introduce an area code split in this geographic region. At footnote 25 of the Commission’s April 26, 2012 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.

*See* April 26, 2012 Order.

Moreover, in its June 20, 2014 *Local Number Portability Porting Interval and Validation Requirements Order*, the FCC stated the following:

In its October 17, 2013 letter, the NANC[[16]](#footnote-17) also recommends approval of Best Practice 30, which calls for “All Services Area Code (NPA) Overlays,” rather than area code splits, as the best solution for area code relief. The NANC states that “NPA Overlays have both practical and technical positive implications for customers and service providers alike.” The letter and accompanying attachment explain that an overlay avoids the need to synchronize old and new area codes in the LNP database to ensure that port requests are completed on time and are not misrouted. The NANC notes that area code overlays treat all customers the same, allowing them to retain their existing area codes and telephone numbers.

CC DA-14-842.[[17]](#footnote-18) Accordingly, the Commission will therefore not seek comments on the geographic split alternative also set forth in 814 Petition submitted by the NANPA. The Commission determines that a geographic split in this instance is not the suitable form of area code relief for the 814 NPA.

Additionally, because technical conferences and public input hearing have been previously held regarding 814 area code relief, we will not recommend additional public input hearings at this time on the two area code relief alternatives set forth in the 814 Petition. The purpose of public input hearings is to get the public’s input to assist the Commission in making the decision on which area code relief to implement. The Commission notes back in 2009, when dealing with the previous forecasted numbering exhaust for the 814 NPA, it had denied the Industry’s recommendation for an all-services distributed overlay relief then and instead requested written comments from interested parties on the five relief alternatives that were presented in the Initial Planning Document attached to the Numbering Exhaust Petition at Docket No. P-2009-2112925. After holding public input hearings throughout the 814 NPA, the Commission issued an Order entered December 17, 2010 at the same docket, that ordered a geographic split of the 814 NPA. The Commission acknowledges that numerous petitions for reconsideration were filed in response to the December 17, 2010 Order requesting the Commission to reconsider its recommendation of a geographic split and instead implement an all-services distributed overlay as the preferred area code relief for the 814 NPA. Thus, the Commission is of the opinion that the purpose of gathering further public input on the preferred form of area code relief for the 814 NPA has already been achieved.

Consequently, in lieu of public input hearings, the Commission directs the Office of Communications to work with the Law Bureau on a Consumer Education Campaign regarding the implementation of the overlay for the geographic area covered by the 814 NPA. The educational campaign will ensure that the public is aware of how the new overlay area code will be implemented in their calling area. This educational campaign may include media outreach, social media and public outreach.

**B. Implementation Schedule and Activation of the Relief Plan Chosen for the 814 NPA**

While a state commission may not utilize numbering optimization measures in lieu of implementing timely area code relief, a state commission may minimize the consumer impact of traditional area code relief by not implementing new area codes sooner than necessary. The current overlay relief plan proposed by the industry allows thirteen months for full implementation of the new NPA. According to this timeline, thirteen months is an adequate amount of time for network preparation of the all-services distributed overlay in the 814 NPA. Moreover, the Commission’s experience with area code overlays is that they can be fully implemented within thirteen months. Consequently, the Commission agrees that the thirteen-month timeline is reasonable for implementation of an overlay for the 814 NPA.

Nonetheless, the mere fact that we are implementing timely area code relief does not mean we should not be diligent in ensuring that the remaining NXX codes in the existing area code are properly allocated or allow the premature exhaust of the existing area code. It is in the public interest to assure that new area codes are opened only when it is necessary, and only after the existing number resources in the existing area code are close to exhaustion.

Additionally, we direct the NANPA to not assign any NXX or central office codes from the new overlay until NXX code resources exhaust in the 814 area code.[[18]](#footnote-19) The NANPA will comply with this directive for as long as suitable resources are available in the 814 area code.

As noted above, the implementation of an overlay requires the adoption of ten-digit dialing for all calls within the 814 NPA. The following table indicates the dialing pattern for the geographic area covered by the 814 NPA once the new overlay area code is activated:

**Dialing Plan for the All Services Distributed Overlay for the 814 NPA**

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

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

When introducing a new area code, there is an adjustment period commonly known as a permissive dialing period. During the permissive dialing period, customers may reach numbers in the geographic area that is to be overlaid by either dialing the area code plus the number or by dialing only the seven-digit number as before. However, during the permissive period, customers are encouraged to make calls using ten-digits. At the end of the permissive dialing period, the mandatory ten-digit dialing period commences and all calls must be made using the area code plus the seven-digit number. If only the seven-digit number is dialed at this time, the customer will reach a recorded announcement stating they must hang up and redial the number using the area code plus the seven-digit number. This recording will be available permanently.

Ten-digit dialing has become prevalent nationwide and is already required in all other Pennsylvania NPAs because area code overlays have been implemented in all areas except the 814 NPA. However, this is the first time that the residents in the 814 NPA will be experiencing area code relief efforts and there may be some confusion regarding the requirement of mandatory ten-digit dialing. The Commission directs that once the network preparedness period has concluded, the permissive dialing period begins. Thereafter, the telecommunications industry should start customer education programs for the new NPA, including the need to dial all ten digits of the area code and phone number.

Thus, the implementation schedule for the new area code overlay will be as follows:

|  |  |
| --- | --- |
| **Event** | **Time Frame** |
| Completion of Network Preparation Period | Completed by October 3, 2020 |
| Permissive 10-Digit Dialing and Customer Education Period  (*Calls within 814 NPA can be dialed using 7 or 10 digits*) | October 3, 2020, to April 3, 2021 |
| End of the Permissive Dialing Period and start of Mandatory 10-digit dialing. | April 3, 2021 |
| Activation of New Area Code | May 1, 2021 |
| Total Implementation Interval | 13 months |

##### Conclusion

The policy of the Commission is to ensure that numbering resources are made available on an equitable, efficient and timely basis in Pennsylvania while ensuring that the impact of proliferating new area codes on consumers is as minimal as possible. In this instance, the Commission notes that an overlay is the least disruptive method of resolving the 814 NPA exhaust issue. As mentioned earlier, we direct the Office of Communications to work with the Law Bureau regarding the Consumer Education Campaign to inform the public about the implementation of the new overlay code covering the 814 NPA; **THEREFORE,**

**IT IS ORDERED:**

1. That the Petition filed with the Commission by the predecessor of Somos, Inc., the North American Numbering Plan Administrator, on behalf of the Pennsylvania telecommunications industry at the above docket for approval of its consensus relief plan for the 814 NPA is hereby granted to the extent consistent with the body of this Order.

2. That the industry consensus recommendation set forth in the petition for an all-services distributed overlay relief plan for the 814 NPA is hereby approved.

3. That the Office of Communications and the Law Bureau are directed to develop a Consumer Education Campaign that may include media outreach, social media and public outreach to give consumers and businesses information regarding the implementation of the all-services distributed overlay of the 814 NPA.

4. That the Secretary’s Bureau shall cause notice of the time, place, and date(s) of the Consumer Education Forum(s) to be published in the newspapers of general circulation in the counties and areas of the 814 NPA.

5. That all NXX code holders in Pennsylvania complete not later than

October 3, 2020, all network preparation to their systems that is necessary to implement the all-services area code overlay in the 814 NPA.

6. That the North American Numbering Plan Administrator shall not assign any NXX central office codes from the new area code prior to exhausting the usable NXX code resources in the 814 area code.

7. That a copy of the press release regarding the Consumer Education Campaign shall be posted on the Commission’s website at <http://www.puc.pa.gov>.

8. That a copy of this order shall be published both in the *Pennsylvania Bulletin* and on the Commission’s website.

9. That a copy of this Order shall be served on all jurisdictional telecommunications carriers, wireless carriers, the Office of Consumer Advocate, the Office of Small Business Advocate and Heidi Wayman and Kimberly Wheeler Miller of Somos, Inc., the North American Numbering Plan Administrator.

10. That a copy of this order shall be served upon the Office of Communications.

**BY THE COMMISSION**

Rosemary Chiavetta

Secretary

(SEAL)

ORDER ADOPTED: April 30, 2020

ORDER ENTERED: April 30, 2020

1. The NANPA is the entity that allocates numbering resources and monitors the viability of area codes to determine when all of the numbers available in the area code are nearing exhaust. The Industry Numbering Committee Guidelines provide that when an area code is nearing exhaust, the NANPA, which then becomes the NPA Relief Planner, convenes a meeting of the industry to discuss relief alternatives. *NPA Code Relief Planning & Notification Guidelines*, The alliance for Telecommunications Industry Solutions Inc. (ATIS)-030061, reissued Oct. 31, 2019, at § 5.5. If the industry reaches a consensus, then its consensus plan is filed with the Commission and the Commission has an opportunity to take action at that point. *NPA Code Relief Planning & Notification Guidelines*, ATIS-0300061, reissued Oct. 31, 2019, at § 5.6. [↑](#footnote-ref-2)
2. This 814 Petition was originally filed by Neustar, Inc. in its role as the North American Numbering Plan Administrator. However, on October 10, 2018, the Federal Communications Commission awarded Somos, Inc. the contract to serve as the NANPA. The transition of the NANPA services from Neustar, Inc. to Somos, Inc. was completed on January 1, 2019. The Commission was updated on the completion by letter dated August 8, 2019. [↑](#footnote-ref-3)
3. The NRUF Report is a semiannual report compiled by the NANPA, based on information provided by the telecom industry in accordance with FCC rules. The main purposes of the NRUF Report are to forecast the exhaust of each area code in the North American Numbering Plan (NANP) and to forecast the exhaust of the NANP as a whole. [↑](#footnote-ref-4)
4. Subsequent to the filing of this Petition, the April 2020 NRUF Report indicates that the projected exhaust date for the 814 NPA has been extended to the third quarter of 2022. *See 2020-1 NRUF and NPA Exhaust Analysis,* April 2020. The April 2020 NRUF Report can be accessed on the NANPA website at <https://nationalnanpa.com/reports/reports_npa.html>. [↑](#footnote-ref-5)
5. A consensus is established when substantial agreement has been reached. Substantial agreement means more than a simple majority, but not necessarily unanimity. ATIS Operating Procedures at <https://www.atis.org/01_legal/docs/OP.pdf>, § 7.1, ver. (ATIS Mar.1, 2015). [↑](#footnote-ref-6)
6. 47 U.S.C. § 251(e)(1). [↑](#footnote-ref-7)
7. *See In the Matter of Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, 717; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* Memorandum Opinion and Order and Order on Reconsideration, 13 FCC Rcd 190029 (1998). [↑](#footnote-ref-8)
8. Telephone numbers consist of 10 digits. The first three digits make up the area code, and the second three digits make up the NXX code. Each NXX code contains 10,000 numbers and each area code contains approximately 792 available NXX codes. [↑](#footnote-ref-9)
9. April 2018 NRUF Report can be accessed on the NANPA website at <https://www.nationalnanpa.com/reports/reports_npa.html>. As indicated *supra* in fn. 4, the April 2020 NRUF Report now indicates that the projected exhaust date for the 814 NPA is the third quarter of 2022. [↑](#footnote-ref-10)
10. This exhaust date was based upon the April 2018 NRUF Report. [↑](#footnote-ref-11)
11. Attached as Exhibit A to the 814 Petition. [↑](#footnote-ref-12)
12. 47 C.F.R § 52.19(c)(3)(ii). [↑](#footnote-ref-13)
13. *In the Matter of Numbering Resource Optimization*, CC Docket Nos. 99-200, 96-98, NSD File

    No. L-99-101 (2000). [↑](#footnote-ref-14)
14. State commissions have no involvement in predicting or projecting the exhaust dates for area codes. The FCC has delegated this responsibility to the NANPA. The NANPA projects exhaust dates for area codes by averaging the past rate of assignment of NXX codes and using that to estimate the future rate at which NXX codes will be assigned. Because these variables are so fluid, projecting accurate exhaust dates is difficult. Thus, with constantly changing information such as this, it is difficult to determine when Pennsylvania’s area codes will exhaust and thereby require the addition of new area codes to ensure that all service providers have numbering resources. [↑](#footnote-ref-15)
15. *See* 47 C.F.R. § 52.19(c)(3). [↑](#footnote-ref-16)
16. The North American Numbering Council (NANC) is a Federal Advisory Committee that was created to advise the Commission on numbering issues and to make recommendations that foster efficient and impartial number administration. [↑](#footnote-ref-17)
17. <https://docs.fcc.gov/public/attachments/DA-14-842A1_Rcd.pdf> [↑](#footnote-ref-18)
18. After the new area code is activated, new customers or existing customers requesting additional numbers may be assigned phone numbers from the new area code. [↑](#footnote-ref-19)