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INFORMATION SHEET

PRESIDING: Brown-Bland, Beatty, Rabon, Bailey, Dockham, Patterson
PLACE: High Point Courthouse, High Point, North Carolina
DATE: June 24, 2014
TIME: 10:00 a.m. to 10:32 a.m.
DOCKET NO.: P-100, Sub 137C
COMPANY: Generic Telephone
DESCRIPTION: Area Code Relief for North Carolina's 336 Numbering Plan Area

FILED

JUL 23 2014

Clerk's Office
N.C. Utilities Commission

APPEARANCES

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FOR AT&T

John Tyler, Esq.

FOR SPRINT

Mary Lynne Grigg, Esq.

FOR THE USING AND CONSUMING PUBLIC

Lucy E. Edmondson, Esq.

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EXHIBITS

WD ✓ Petitioner's Exhibits 2, 3, 4, 5 I/A

COPIES ORDERED: Email:- Tyler, Edmondson

REPORTED BY: Linda Garrett
TRANSCRIBED BY: Linda Garrett
DATE TRANSCRIBED: July 3, 2014

TRANSCRIPT PAGES: 29
PREFILED PAGES: -0-

NORTH CAROLINA UTILITIES COMMISSION
PUBLIC STAFF - APPEARANCE SLIP

DATE 06/24/14 DOCKET #: P-100, Sub 137C

PUBLIC STAFF MEMBER Lucy E. Edmondson

ORDER FOR TRANSCRIPT OF TESTIMONY TO BE **EMAILED** TO THE
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Lucy E. Edmondson
Signature of Public Staff Member

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APPLICANT ✓ COMPLAINANT _____ INTERVENER _____
PROTESTANT _____ RESPONDENT _____ DEFENDANT _____

Petitioner ✓

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Signature of Attorney

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Petitioner's Exhibit 4
I/A

June 24, 2004

ORIGINAL

By Overnight Courier

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OFFICIAL COPY

FILED

JUN 25 2004

FILED
JUN 25 2004
Clerk's Office
N.C. Utilities Commission

Clerk's Office
N.C. Utilities Commission

Re: P100-Sub137C: Petition for Approval of NPA
Relief Plan for the 336 Area Code

Dear Ms. Thigpen:

NeuStar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby notifies the North Carolina Utilities Commission ("Commission") that the 336 numbering plan area ("NPA") code is not projected to exhaust within the next five years. As such, pursuant to industry guidelines, the Industry¹ or the Commission may request in writing to NANPA that the NPA relief plan for the 336 NPA be withdrawn.

On September 7, 2000, NANPA filed a petition ("Petition") in the above-referenced docket on behalf of the Industry requesting that the Commission approve the Industry's recommended all-services distributed overlay relief plan. The Petition stated that according to the 2000 Central Office Code Utilization Survey, the 336 NPA was projected to exhaust during the fourth quarter of 2002. On April 30, 2004, NANPA released the 2004 NRUF and NPA Exhaust Analysis ("2004 NRUF Analysis"), which incorporated updated actual and projected demand for numbering resources submitted to NANPA by the Industry. According to the 2004 NRUF Analysis, the 336 projected exhaust date is the second quarter 2010.² The extension of the projected exhaust, compared to the projected exhaust date set forth in the Petition, is due in part to the

¹ The Industry is comprised of telecommunications entities operating in or considering operations within the 336 NPA in North Carolina.

² 2004 NRUF and NPA Exhaust Analysis (April 30, 2004) ("2004 NRUF Analysis"). Due to a change in Federal Communications Commission regulations, the NRUF Analysis replaced the Central Office Code Utilization Survey in 2000. See, *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 00-104 (March 31, 2000) at ¶5.

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implementation of thousands block pooling in February of 2002 and a continued decrease in demand for numbering resources.³

The Industry Numbering Committee ("INC") revised the guidelines, which NANPA is required to follow for NPA relief planning purposes, to allow for a mechanism to withdraw NPA relief petitions filed with state commissions if the NPA is not projected to exhaust within five years based upon a non-rationed forecast and the state commission has not approved the petition.⁴ Pursuant to those guidelines, NANPA hereby notifies the Commission (and the Industry via posting a copy of this letter on NANPA's NANP Administration System) that 1) the projected exhaust date for the 336 NPA is more than five years from the date of this letter, 2) the NPA is not in jeopardy, 3) the Commission has not yet acted on the Industry's Petition, and 4) 160 central office codes remain available for assignment in the 336 NPA. As such, if NANPA receives a written request from the Commission or at least two Industry members⁵ to rescind the Petition, NANPA expeditiously will convene an Industry conference call for the purpose of gaining Industry consensus to withdraw the relief plan and forward the results of that meeting to the Commission.

³ This is the second such letter NANPA has filed with the Commission notifying the Commission that the 336 NPA relief Petition is eligible, under industry guidelines, to be withdrawn. See Letter to Ms. Geneva Thigpen, North Carolina Utilities Commission from Kimberly Wheeler Miller, NeuStar, Inc. (June 17, 2003).

⁴ The guidelines state:

During the period of time after NANPA has filed an industry relief plan recommendation with a regulatory authority but before the regulator has approved the plan, the NANPA may determine that the NPA will not exhaust in the next five years based on a non-rationed forecast. Events may have taken place such as a reduction in code demand, the return of codes, and or the implementation of number conservation, e.g., rate center consolidation, number pooling, that result in moving the NPA exhaust forecast outward significantly into the future.

NANPA will notify the industry and regulatory authorities when such a determination is made. In this notification, NANPA will provide the number of codes available in the NPA and a new projected NPA exhaust date. Upon notification from the NANPA, local industry (per section 5.5.1) or a regulatory authority may request in writing that the NPA relief plan be rescinded. If requested by a state regulator or the industry to withdraw a filed, unapproved relief plan, NANPA will convene a conference call for the purpose of gaining industry consensus to withdraw the relief plan petition under the following conditions:

- (a) The forecasted exhaust of the NPA is at least five years in the future, and,
- (b) The NPA is not in jeopardy.

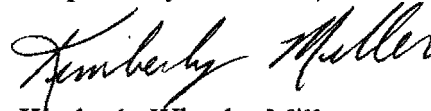
NPA Code Relief Planning & Notification Guidelines, INC97-0404-016, §5.10 (Industry Numbering Committee, October 3, 2003) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines can be accessed on the Alliance for Telecommunications Industry Solutions at www.atis.org.

⁵ NPA Relief Planning Guidelines at §5.5.1.

Ms. Thigpen
June 24, 2004
Page 3

Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kimberly Wheeler Miller". The signature is fluid and cursive, with the first name "Kimberly" written in a larger, more prominent script than the last name "Miller".

Kimberly Wheeler Miller
Director, Regulatory Law and Public Policy

cc: Service List
Interested Industry members
(via NANPA's NANP Administration System)

I, Kimberly Wheeler Miller, do hereby certify that complete copies of the foregoing letter were delivered, by First Class Mail, on this 24th day of June, 2004, to the following:

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SEP 23 2000

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September 7, 2000

Clerk's Office
N.C. Utilities Commission

Via Hand Delivery

Geneva Thigpen, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
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OFFICIAL COPY

FILED

SEP 07 2000

Clerk's Office
N.C. Utilities Commission

**Re: Petition of the North American Numbering Plan
Administrator, on behalf of the North Carolina
Telecommunications Industry, for Relief of the 336 Area
Code, Docket No. P100 SUB 137C**

Clerk

AG

7 Com

Bennish

Long

Hoover

Kite

Sessoms

Steel

Szyed

Sharpe

Wigfall

Druber

3 Legal

3 Acctg.

2 Econ Res.

3 Commu.

Dear Ms. Thigpen:

Enclosed for filing in the above-referenced action please find an original and 30 copies of the Petition of the North American Numbering Plan Administrator, NeuStar, Inc. Please date-stamp and return to us via our courier the additional enclosed copies. Please do not hesitate to telephone the undersigned with any questions concerning this matter.

Sincerely,

West Law Offices, P.C.

By: 
James P. West

Counsel for NeuStar, Inc.
North American Numbering Plan Administrator

Enclosures

cc: Antoinette Wike, Esq.
Kimberly D. Wheeler, Esq.

Before the
NORTH CAROLINA UTILITIES COMMISSION
Raleigh, North Carolina 27626-0510

NANPA, on behalf of the North Carolina
Telecommunications Industry,

Petition for Approval of NPA Relief Plan
for the 336 Area Code

OFFICIAL COPY

Docket No. P100 SUB 137C

FILED

SEP 07 2000

Clerk's Office
North Carolina Utilities Commission

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATION
ON BEHALF OF THE NORTH CAROLINA TELECOMMUNICATIONS
INDUSTRY**

NeuStar, Inc, in its role as the North American Numbering Plan Administrator ("NANPA") for North Carolina under the North American Numbering Plan and acting on behalf of the North Carolina telecommunications industry ("Industry"),¹ petitions the North Carolina Utilities Commission ("Commission")² for approval of the Industry's consensus decision to implement an all services distributed overlay relief plan for the 336 Numbering Plan Area ("NPA").³ The Industry submits its recommendation to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the state of North Carolina.

² The Federal Communications Commission delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19 (1999).

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

referred to as "CO" or "NXX" codes) for the 336 NPA would exhaust during the fourth quarter of 2002.⁴ In order to allow sufficient time for completion of the consensus plan prior to exhaust, the Industry requests that the Commission issue a decision approving the Industry's recommended relief plan no later than thirteen months preceding the proposed exhaust of the 336 NPA. Based upon the 2000 COCUS, the Industry requests the Commission issue a decision by September 1, 2001.⁵ In support of this Petition, NANPA submits the following:

I. BACKGROUND

Based upon the projected exhaust date and pursuant to Industry guidelines,⁶ NANPA facilitated an Industry meeting in Greensboro, North Carolina on July 27, 2000, to review and discuss relief alternatives for the 336 NPA.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document ("IPD") prior to the relief planning meeting. The IPD set forth four relief proposals for the 336 NPA: an all services distributed overlay – referred to as Alternative #1 in the IPD, a geographic split in which the dividing line encompasses the Winston-Salem, Greensboro and High Point

⁴ 2000 COCUS and NPA Exhaust Analysis, May 23, 2000 ("2000 COCUS"). The 2000 COCUS can be accessed on NANPA's web site at <<http://www.nanpa.com>>.

⁵ Future updates of the COCUS may cause this date to change.

⁶ To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 8, 1999) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

⁷ Attached as Exhibit A is a copy of the July 27, 2000 relief planning meeting minutes.

rate centers, creating a doughnut-shaped geographic area – referred to as Alternative #2; a geographic split with the boundary line following rate center boundaries in a northeastern to southwestern direction placing the High Point rate center to the west of the line and the Summerfield, Monticello, Reidsville, Gatewood, and Ruffin rate centers to the east – referred to as Alternative #3; and a geographic split with the boundary line following rate center boundaries in a northeastern to southwestern direction placing the High Point rate center on the eastern side of the line and the Summerfield, Monticello, Reidsville, Gatewood, and Ruffin rate centers on the western side – referred to as Alternative #4.⁸ No additional alternatives were presented by Industry members. The IPD included NPA maps, descriptions, dialing requirements, and the projected life in years of each relief alternative.

At the meeting, the participants discussed the attributes of the various alternatives for each NPA and reached consensus to recommend Alternative #1, the all services distributed overlay relief plan, for the 336 NPA. The Industry eliminated from consideration the geographic split alternatives because the dividing line would split at least four counties in each alternative, divide seven-digit local dialing routes, and create a confusing mixture of seven and ten-digit local dialing. There is no assurance that the two resulting NPAs will exhaust at approximately the same time and the percentage of seven-digit dialing would be greatly reduced in some areas.⁹ The Industry noted that all three geographic split alternatives

⁸ A copy of the IPD, including maps depicting each alternative, is attached as Attachment #5 to Exhibit A.

⁹ See Exhibit A for the percentage of seven-digit dialing retained in certain rate centers if one of the geographic split alternatives is implemented.

have the potential of forcing some customers, who have changed their telephone numbers three time in the previous six years, to do so again. Alternatives #3 and #4 would divide the Triad area of High Point and Greensboro from Winston-Salem, and Alternative #4 would separate the Gatewood and Milton rate centers which are served by the same switch in the Lynchburg, Virginia Local Access and Transport Area ("LATA").

II. DESCRIPTION OF THE PROPOSED ALL SERVICES DISTRIBUTED OVERLAY RELIEF PLAN FOR THE 336 NPA

The recommended all services distributed overlay alternative for the 336 NPA would overlay a new area code over the same geographic area covered by the existing NPA. All existing customers in the 336 NPA would retain their current ten digit telephone numbers. In agreement with Federal Communications Commission regulations, the relief plan would require ten-digit dialing for calls within and between all area codes in the geographic area covered by the overlay area code.¹⁰ Accordingly, the Industry recommends that seven-digit dialing across NPA boundaries be eliminated and that the Commission require ten-digit dialing for local, extended area service ("EAS") and expanded local calling services ("ELCS") calls placed across NPA boundaries. When the 336 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #1 is nine years.

The Industry recommends that the Commission release an NPA relief order before September 1, 2001. Based upon a relief order released in September 2001, the Industry recommends that the Board adopt a thirteen-month implementation schedule including a

¹⁰ 47 C.F.R. § 52.19(c)(3)(ii).

four-month network preparation period beginning immediately upon the release of the Commission's relief order. The network preparation period will be followed by a two month customer education preparation period and then a six month permissive dialing period during which customers may dial seven or ten digits for local calls placed within the 336 NPA and all cross boundary calls. Mandatory dialing will begin twelve months after the relief order is released. The Industry plans to implement a second phase of customer education one month prior to the commencement of mandatory dialing. Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 336 NPA in North Carolina to prevent the exhaust of numbering resources. NANPA, on behalf of the Industry, requests that the Commission approve the Industry's recommended all services distributed overlay relief plan and implementation schedule for the 336 NPA no later than thirteen months preceding the projected exhaust of the 336 NPA. Based upon the 2000 COCUS, the Industry requests the Commission issue a decision by September 1, 2001. The

Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition.

Respectfully submitted,



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September 7, 2000

EXHIBIT A

**MEETING MINUTES OF THE NORTH CAROLINA
336 NPA RELIEF PLANNING INDUSTRY MEETING
THURSDAY, JULY 27, 2000
Greensboro, North Carolina**

FILED

JUL 07 2000

**CHIEF CLERK
N.C. UTILITIES COMMISSION**

**MEETING MINUTES OF THE NORTH CAROLINA
336 NPA RELIEF PLANNING INDUSTRY MEETING
THURSDAY, JULY 27, 2000
Greensboro, North Carolina**

WELCOME AND INTRODUCTIONS

Thomas C. Foley, NPA Relief Planner, NeuStar, Inc., introduced himself, Wayne Milby, Senior NPA Relief Planner and Jim Deak, Regional Director – NPA Relief Planning and welcomed everyone to the 336 Relief Planning Meeting. He then asked the attendees to introduce themselves and identify the companies they represented. There were 21 participants at the meeting representing 11 different telecommunication carriers and the North Carolina Utilities Commission. See Attachment #1 for the names of those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA'S ROLE AND RESPONSIBILITIES

Mr. Foley shared points regarding NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address: www.atis.org/atis/nanp/nanpreq.htm.

Mr. Foley provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. The list also included the e-mail addresses of Eastern Region NPA Relief Planning staff members.

REVIEW OF INDUSTRY GUIDELINES

Mr. Foley reviewed a summary of the Industry Approved Documentation Related to NPA Exhaust including the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Issued 1/27/99). This document can be obtained from the Internet at www.atis.org/atis/clc/inc/incdocs.htm. In addition, Mr. Foley described the ATIS consensus process and the consensus process described in the industry guidelines.

It was noted that only consensus items would be recorded in the minutes and statements which were not adopted pursuant to the consensus process could be included in the meeting minutes in the form of a "Statement for the Record" by the particular company or companies which supported the statement. The meeting format was reviewed and participants were reminded that the meeting minutes serve as the basis of the filing of the recommended relief plan with the North Carolina Utilities Commission.

NPA RELIEF ALTERNATIVE ATTRIBUTES

Mr. Foley reviewed a summary of General NPA Relief Attributes for NPA Overlays, Splits and Concentrated Growth Overlay Options (Attachment #3).

CODE ASSIGNMENT HISTORY FOR 336 NPA

Mr. Foley reviewed the status and history of the code assignments in the 336 NPA. See Attachment #4.

INITIAL PLANNING DOCUMENT FOR 336

The 2000 COCUS projected exhaust date is 4Q2002 for the 336 NPA. Mr. Foley reviewed the Initial Planning Document ("IPD") that was prepared and distributed prior to the meeting. See Attachment #5 for a copy of the IPD. The IPD proposed and described FOUR relief alternatives for the 336 NPA: an all services distributed overlay (Alternative #1), and three geographic splits (Alternatives #2, #3 and #4). The IPD contained detailed maps and the projected lives of each alternative.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 336

No additional alternatives were presented by the industry.

ELIMINATION OF ALTERNATIVES

A proposal was made, and consensus reached, to eliminate Alternative #4 for the following reasons:

- Splits five counties;
- Disrupts seven-digit calling routes
- Splits the Triad area: High Point and Greensboro from Winston-Salem;
- Separates Gatewood and Milton rate centers which are served from the same switch in Virginia;
- * For Greensboro, only 34% of the dialing would remain 7-digit;
- * For Winston-Salem, 87% of the dialing would remain 7-digit;
- * For High Point, only 25% of the dialing would remain 7-digit;
- Creates a confusing mixture of 7- and 10-digit dialing;
- No assurance of equal lives; and
- Some customers have already changed NPAs three times in the last six years.

* Refer to Attachment #6 for additional information on these items

A proposal was made, and consensus reached, to eliminate Alternative #3 for the following reasons:

- Splits five counties;
- Disrupts seven-digit calling routes;
- Splits the Triad area: High Point and Greensboro from Winston-Salem;
- * For Greensboro, 50% of the dialing would remain 7-digit;
- * For Winston-Salem, 78% of the dialing would remain 7-digit;
- * For High Point, 60% of the dialing would remain 7-digit;
- Creates a confusing mixture of 7- and 10-digit dialing;
- Splits rate centers served by the same switch;

- No assurance of equal lives; and
- Some customers have already changed NPAs three times in the last six years.

* Refer to Attachment #6 for additional information on these items

A proposal was made, and consensus reached, to eliminate Alternative #2. The participants agreed that the reasons for elimination are:

- Splits four counties;
- Creates a very confusing mix of 7- and 10-digit dialing;
- Confusing dialing arrangements
- * For Greensboro, only 7% of the dialing would remain 7-digit;
- * For Winston-Salem, only 5% of the dialing would remain 7-digit;
- * For High Point, only 6% of the dialing would remain 7-digit;
- Splits host from remotes;
- No assurance of equal lives; and
- Some customers have already changed NPAs three times in the last six years.

* Refer to Attachment #6 for additional information on these items

CONSENSUS ON RELIEF ALTERNATIVE

A proposal was made, and consensus was reached, to recommend Alternative #1 as the method of relief for the 336 NPA.

A proposal was made, and consensus was reached, to list reasons the split alternatives were not acceptable as opposed to listing the reasons to recommend the overlay.

CONSENSUS ON A DIALING PLAN

Consensus was reached to recommend the Commission adopt the following dialing plan be adopted upon relief of the 336 NPA:

10 digit local dialing

Eliminate cross boundary 7 digit dialing

CONSENSUS ON RECOMMENDED IMPLEMENTATION INTERVALS

A proposal was made, and consensus reached, to include the following time line with the filing:

T = 0	Commission Order received
T + 4 months	Customer Education preparation
T + 6 months	Begin permissive dialing and customer education
T + 11 months	Heavy customer education program
T + 12 months	Mandatory dialing
T + 13 months	Earliest code effective date in the new NPA

The Industry respectfully is requesting the North Carolina Utilities Commission issue an order on this matter no later than September 1, 2001.

INDUSTRY COMMITMENT ON A TEST NUMBER

BellSouth volunteered to provide the test number

CONSENSUS ON NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Industry participants reached consensus to have NANPA file, on behalf of the industry, the results of the industry efforts regarding the 336 NPA relief in the form of a formal petition for relief with the North Carolina Utilities Commission. The date of the filing with the Commission will be September 7, 2000. Based on the current COCUS projected exhaust date of 4Q02 and the above intervals, the Industry respectfully requests the North Carolina Utilities Commission make the decision by no later than 9/1/01. The industry also feels it would be beneficial if an order could be provided earlier.

STATEMENTS FOR THE RECORD

There were no statements for the record offered at the meeting

CONFERENCE CALL TO APPROVE MINUTES

Consensus was reached that the draft minutes and draft filing from this meeting will be distributed to the industry by August 24, 2000. Additionally, a conference call will be held on 8/31/00 at 10:00 a.m. ET to review and approve the draft filing and meeting minutes. The dial in number is 847-619-6648; the access code is 6900355#.

The conference call was held as scheduled and these minutes and draft filing were approved as corrected.

Attachment #1

ATTENDEES NORTH CAROLINA 336 NPA RELIEF PLANNING INDUSTRY MEETING THURSDAY JULY 27, 2000 Greensboro, North Carolina

Thomas C. Foley	NeuStar, Inc., NANPA
D. Wayne Milby	NeuStar, Inc., NANPA
Jim Deak	NeuStar, Inc., NANPA
Dan Abernathy	Concord Telephone Company
Erin Duffy	North Carolina Utilities Commission
John Garrison	North Carolina Utilities Commission
Chuck Greene	BellSouth
Shelia Hailey	BellSouth
Anne Henderson	AT&T
Tom Honeycutt	North State Telephone
Steve King	Lexcom Telephone Company
Charles Lewis	BellSouth
Douglas McCullough	BellSouth
Deborah Moyer	Sprint
Bruce Rappoport	Verizon Wireless
Pamela Smith	BellSouth
Priscilla Tyree	North Carolina Utilities Commission
Gary Walker	Alltel
Lynn Welborn	North State Telephone
Thomas Wilson	CTC Exchange Services
John Dixon	Skyline TMC
Glenn Taylor	Sprint
Jack Britt	North Carolina Utilities Commission
Greg Roark	Carolina West Utilities
Mark Dula	North State Telephone

Attachment #2

NORTH CAROLINA 336 NPA RELIEF INDUSTRY MEETING Thursday July 27, 2000

AGENDA

- | | |
|-------|--|
| 8:30 | Registration |
| 8:45 | Welcome and Introductions |
| 8:55 | NANPA Role and Responsibilities |
| 9:05 | Minutes and "Statements For The Record" |
| 9:15 | Industry Guidelines/General Attributes |
| 9:25 | Review Code Assignment History |
| 9:40 | Review Initial Planning Document (IPD) |
| 10:15 | Break |
| 10:30 | Review Initial Planning Document (IPD) |
| 11:00 | Additional Alternatives from Industry |
| 11:45 | Lunch (On Your Own) |
| 12:45 | Elimination Of Alternatives |
| 1:00 | Consensus On Relief Alternative |
| 2:15 | Consensus on Dialing Plan |
| 2:30 | Break |
| 2:45 | Consensus on Implementation Intervals |
| 3:15 | Industry Commitment For Test Number |
| 3:30 | Consensus on NANPA Filing Industry Efforts With Commission |
| 3:40 | Statements For the Record |
| 3:45 | Set Date For Conference Call To Approve Minutes |
| 3:55 | Complete NANPA Survey |
| 4:00 | Adjourn |

Attachment #3
GENERAL ATTRIBUTES
NORTH CAROLINA 336 NPA RELIEF
General NPA Relief Alternative Attributes

FILED

SEP 07 2000

CHIEF CLERK
N.C. UTILITIES COMMISSION

Splits

Overlays

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Future splits will reduce the geographic size of the area code.
- Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.
- Geographic splits permit 7 digit local dialing within the smaller home NPA. However local dialing across the NPA boundary should become 10 digit.

General Attributes of Overlays

- With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
 - An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
 - An overlay will require customers to dial 10 Digits or 1 + 10 digits for all calls within the geographic area.
-

Overlays

General Attributes of Concentrated Growth Overlays

- Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay.
 - It is very difficult to predict the exhaust of the non-overlay area of the concentrated overlay.
 - Customer confusion pertaining to dialing for a concentrated overlay could exist.
 - In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.
 - A concentrated growth overlay minimizes implementation of 10 digit dialing for customers.
 - Normally, no existing customers will be required to change their telephone number.
-

Attachment #4

**Status of 336 NPA Code Assignments
As of 07/17/2000**

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N.C. UTILITIES COMMISSION**

NPA	336					
Assigned NXXs	579					
Protected	0					
Reserved	2					
Hold	1					
Test NXXs	3					
Unavailable NXXs	16					
Available NXXs	199					
Total	800					
Service Providers:	336					
ILEC	14					
CLEC	22					
CAP	0					
Interexchange Carrier	0					
Wireless	17					
Reseller	2					
Codes assigned NPA 336	Jan-99	Feb-99	Mar-99	Apr-99		
	3	15	5	3		
	May-99	Jun-99	Jul-99	Aug-99		
	9	3	1	7		
	Sep-99	Oct-99	Nov-99	Dec-99		
	1	8	11	4		
	Jan-00	Feb-00	Mar-00	Apr-00		
	4	9	9	3		
	May-00	Jun-00	Jul-00			
	16	8	0			

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SEP 07 2000

CHIEF CLERK
N.C. UTILITIES COMMISSION

Attachment #5
INITIAL PLANNING DOCUMENT
NORTH CAROLINA 336 NPA RELIEF

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N.C. UTILITIES COMMISSION

Initial Planning Document

For Relief of North Carolina: 336 NPA

April 2000 COCUS Projected Exhaust Date 4Q2002

North American Numbering Plan Administration

Thomas C. Foley
NPA Relief Planner – Eastern Region

336 NPA Relief Alternatives
Projected Exhaust Date 4Q2002



Alternative # 1

Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 336 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code 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 336 NPA all code assignments will be made in the new overlay area code.

Total codes at Exhaust = 780

Area code life in years = 9



The following three alternatives all involve the use of geographic splits. A split occurs when one geographic area receives a new NPA, while the other retains the current 336 NPA. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit local dialing would be permitted.

Alternative # 2

Geographic Split – Winston-Salem, Greensboro, and High Point

The split boundary line runs around the three rate centers, creating a “circle”. Inside the “circle”, Area B, local calling would remain 7-digits.

Area A, Northeast of the split line

Total codes at Exhaust = 374

Area code life in years = 9

Area B, Southwest of the split line

Total codes at Exhaust = 406

Area code life in years = 8

336 NPA Relief Alternatives
Projected Exhaust Date 4Q2002

Alternative # 3

Geographic Split – High Point “A”

The split boundary line runs along rate center boundaries in a northeastern/southwestern direction. The High Point Rate Center is on the west or, “A”, side. The rate centers of Summerfield, Monticello, Reidsville, Gatewood, and Ruffin are located on side “B”, east of the split line

Area A, West of Split Line
Total codes at Exhaust = 400
Area code life in years = 8

Area B, East of Split Line
Total codes at Exhaust = 380
Area code life in years = 9

Alternative # 4

Geographic Split – High Point “B”

Similar to Alternative #3 above. The split boundary line runs along rate center boundaries in a northeastern/southwestern direction. The High Point Rate Center is on the east or, “B”, side. Also, the rate centers of Summerfield, Monticello, Reidsville, Gatewood, and Ruffin are located on side “A”, west of the split line.

Area A, West of Split Line
Total codes at Exhaust = 390
Area code life in years = 9

Area B, East of Split Line
Total codes at Exhaust = 390
Area code life in years = 8

NORTH CAROLINA 336 NPA ALTERNATIVES

PROJECTED LIVES OF RELIEF ALTERNATIVES

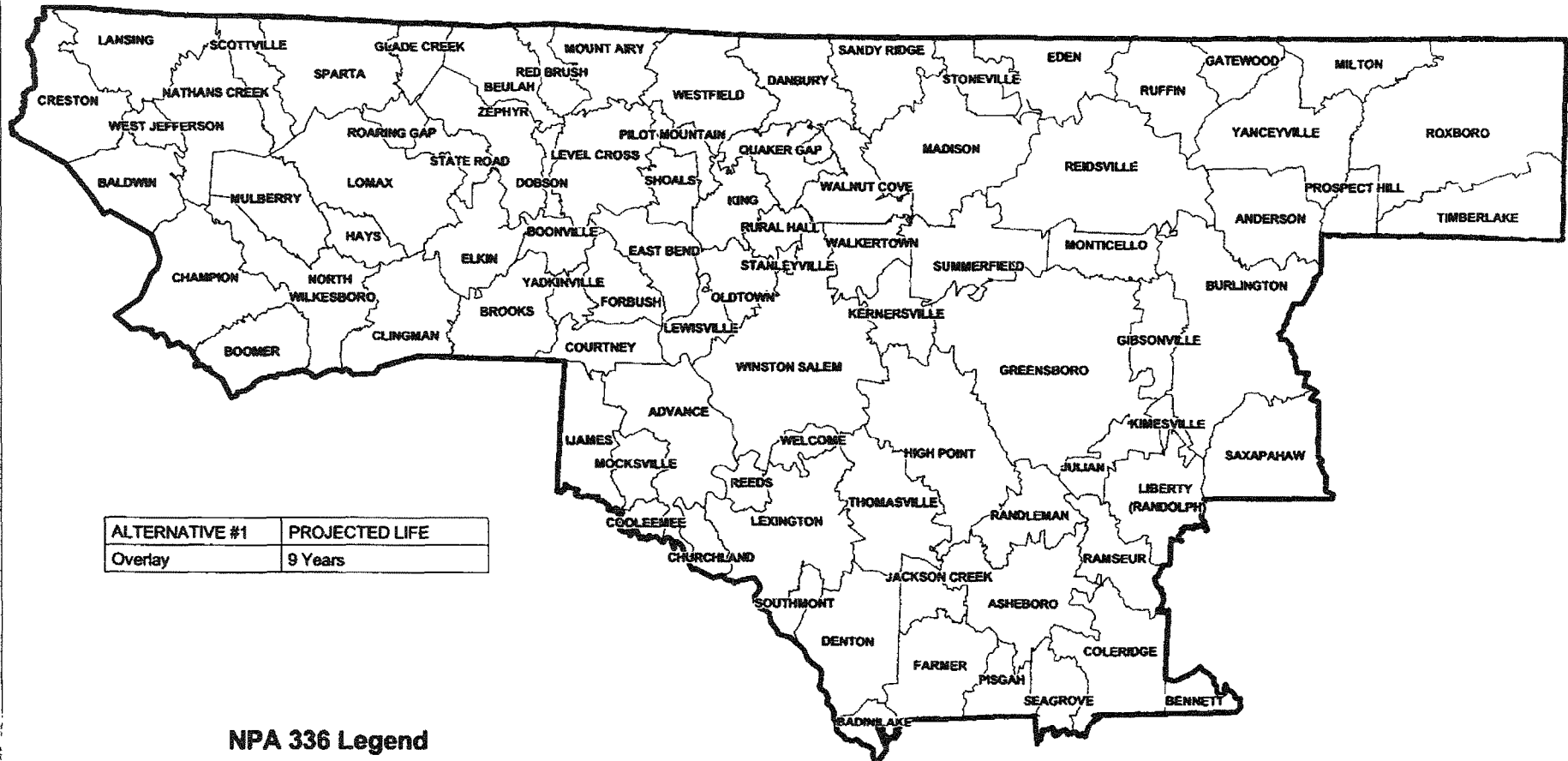
STANDARD LIVES

<u>Alternative</u>	<u>Area A</u>	<u>Area B</u>
#1		9
#2	9	8
#3	8	9
#4	9	8

NPA 336 Rate Center Map



ALTERNATIVE #1 Distributed Overlay



ALTERNATIVE #1	PROJECTED LIFE
Overlay	9 Years

NPA 336 Legend

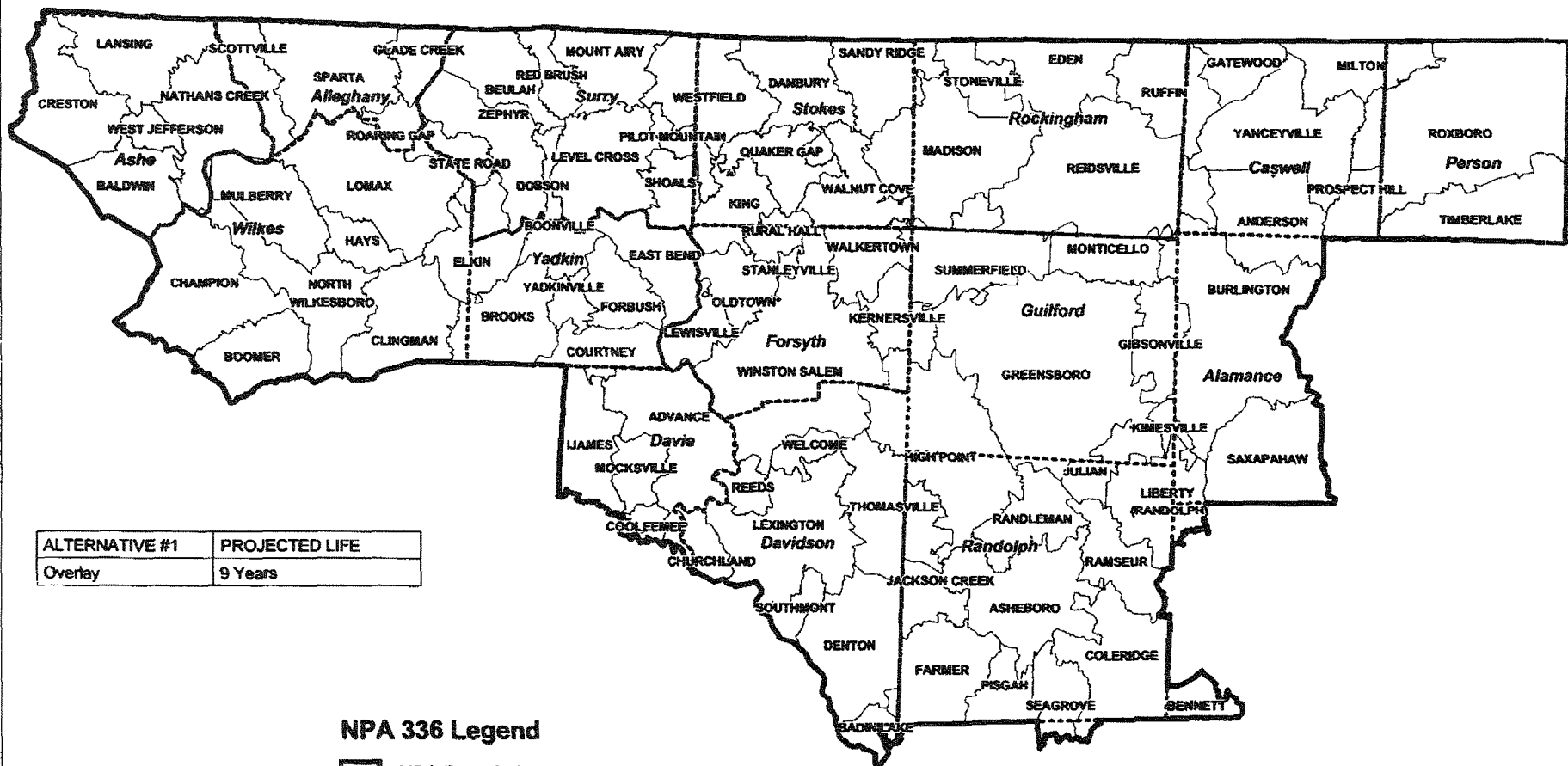
- NPA Boundaries
- Rate Center Boundaries



NPA 336 Rate Center & County Map



ALTERNATIVE #1 Distributed Overlay



ALTERNATIVE #1	PROJECTED LIFE
Overlay	9 Years

NPA 336 Legend

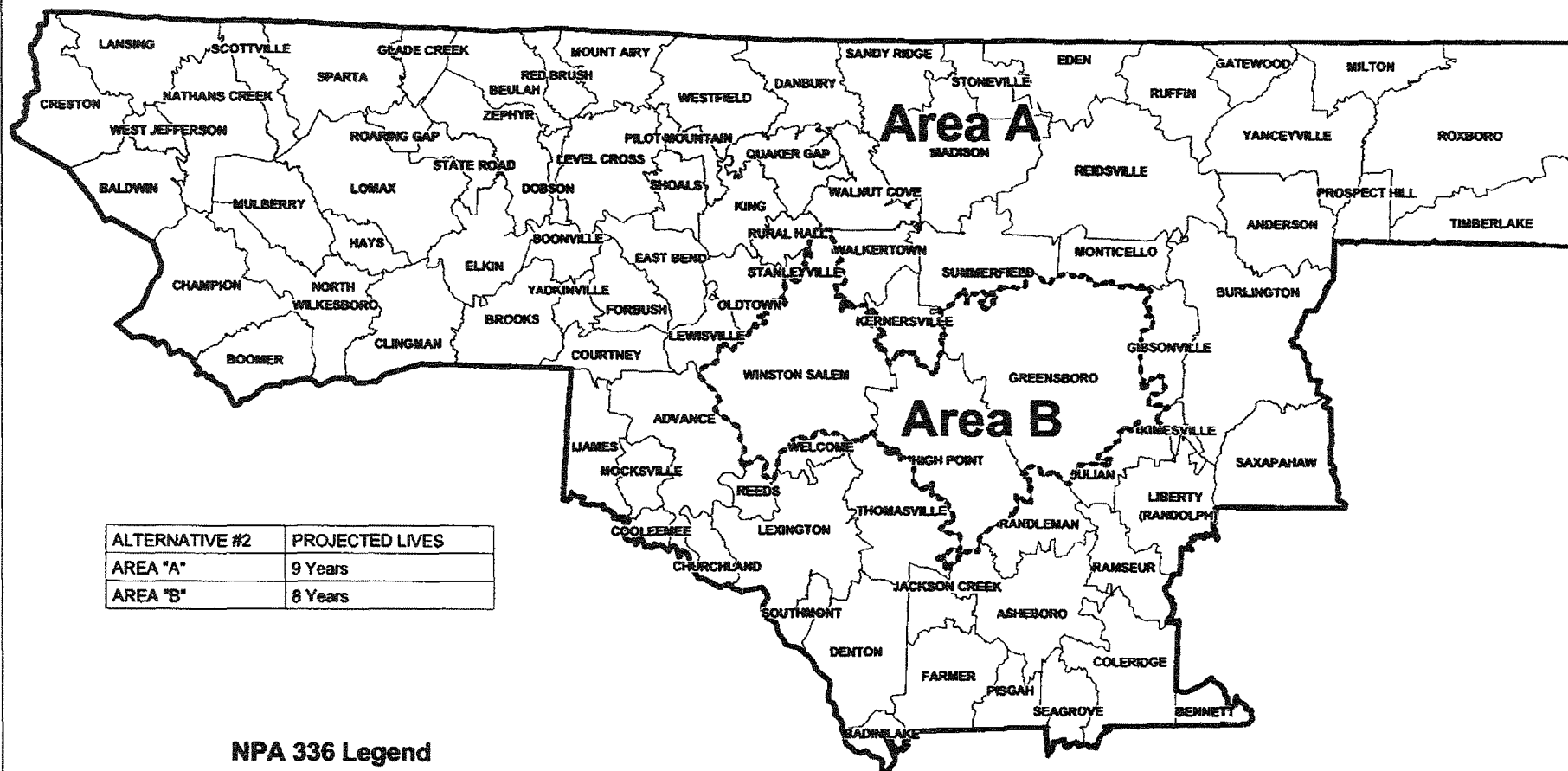
- NPA Boundaries
- Rate Center Boundaries
- County Boundaries



NPA 336 Rate Center Map



ALTERNATIVE #2 NPA SPLIT Winston Salem, Greensboro, High Point



ALTERNATIVE #2	PROJECTED LIVES
AREA "A"	9 Years
AREA "B"	8 Years

NPA 336 Legend

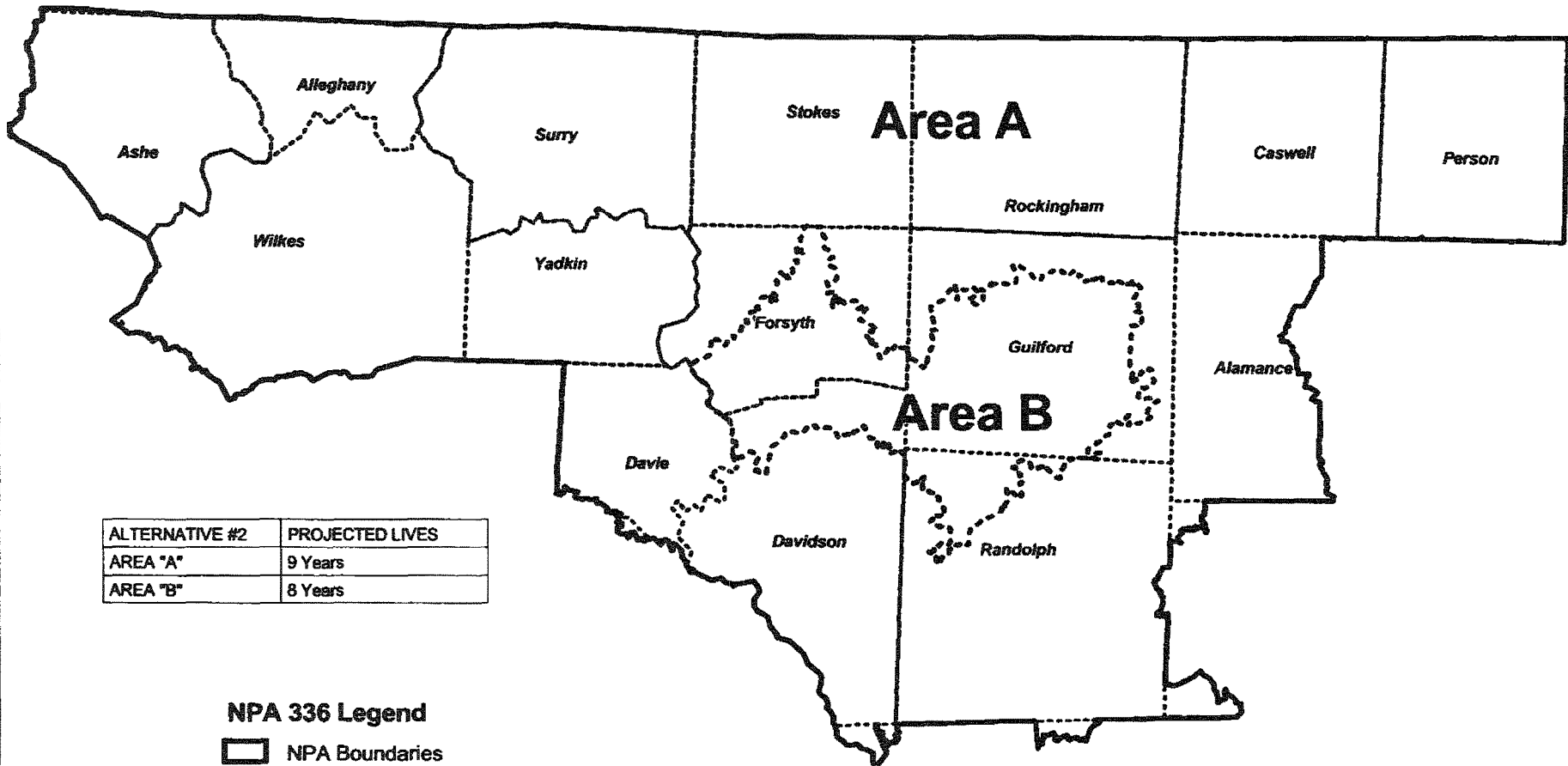
- NPA Boundaries
- Rate Center Boundaries
- Split Line



NPA 336 County Map



ALTERNATIVE #2
NPA SPLIT
Winston Salem, Greensboro, High Point



ALTERNATIVE #2	PROJECTED LIVES
AREA "A"	9 Years
AREA "B"	8 Years

NPA 336 Legend

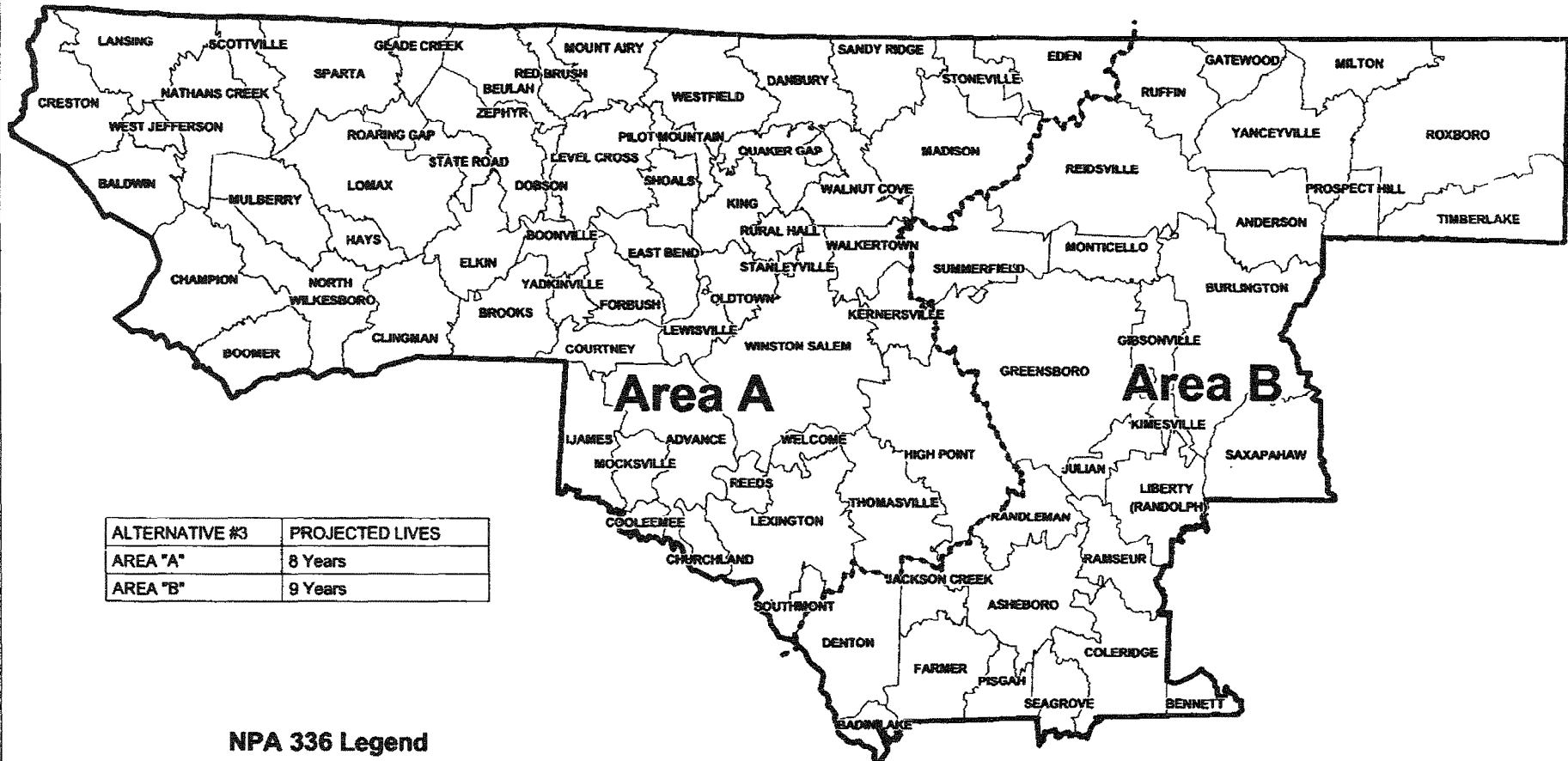
- NPA Boundaries
- County Boundaries
- Split Line



NPA 336 Rate Center Map



ALTERNATIVE #3 NPA SPLIT "High Point A"



ALTERNATIVE #3	PROJECTED LIVES
AREA "A"	8 Years
AREA "B"	9 Years

NPA 336 Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line



NPA 336 County Map



ALTERNATIVE #3 NPA SPLIT "High Point A"



ALTERNATIVE #3	PROJECTED LIVES
AREA "A"	8 Years
AREA "B"	9 Years

NPA 336 Legend

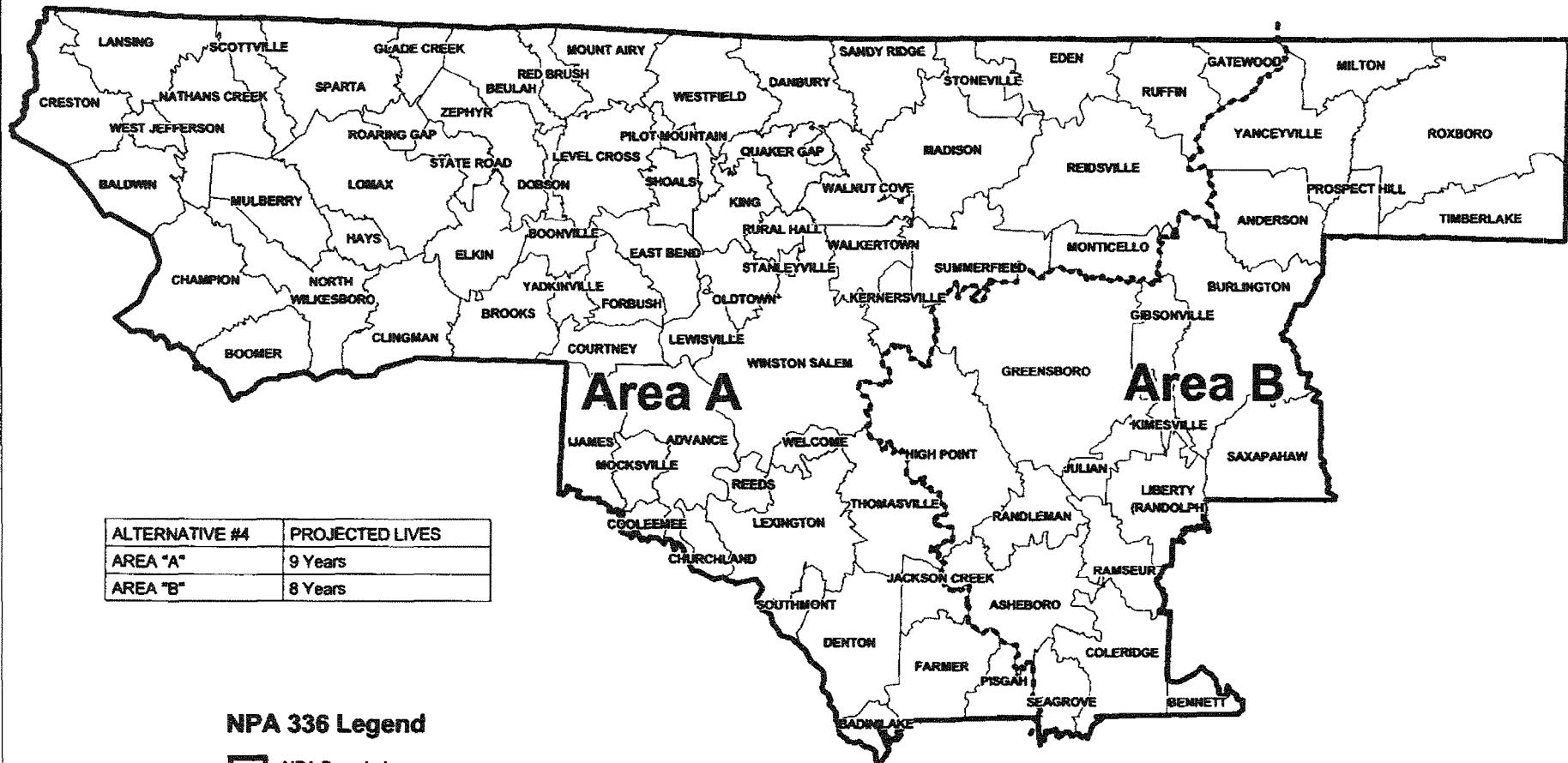
- NPA Boundaries
- County Boundaries
- Split Line



NPA 336 Rate Center Map



ALTERNATIVE #4 NPA SPLIT "High Point B"



ALTERNATIVE #4	PROJECTED LIVES
AREA "A"	9 Years
AREA "B"	8 Years

NPA 336 Legend

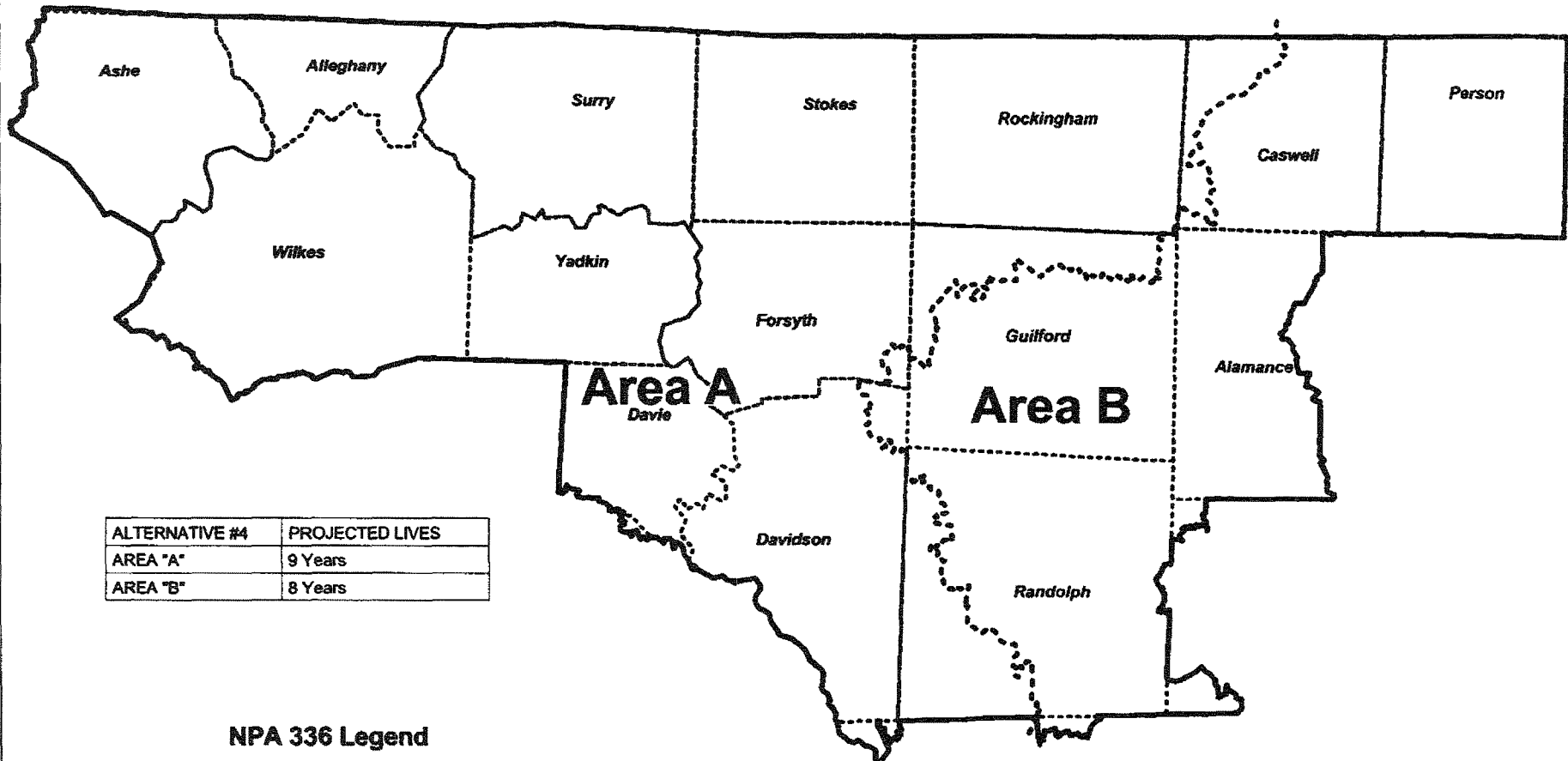
- NPA Boundaries
- Rate Center Boundaries
- Split Line



NPA 336 County Map



ALTERNATIVE #4 NPA SPLIT "High Point B"



ALTERNATIVE #4	PROJECTED LIVES
AREA "A"	9 Years
AREA "B"	8 Years

NPA 336 Legend

- NPA Boundaries
- County Boundaries
- Split Line



RATE CENTER TABLE

STATE: NC							
NPA: 336							
LERG Date: 6/1/00							
Count of NXX	CATEGORY						
RC FULL NAME	CLEC	ICO	PCS	RBOC	WIRELESS	(blank)	Grand Total
ADVANCE		3			1		4
ANDERSON	1			1			2
ASHEBORO	3	9	1		7		20
BADIN LAKE		1					1
BALDWIN		3					3
BENNETT		1					1
BEULAH		1					1
BOOMER		1					1
BOONVILLE		1					1
BROOKS		3			1		4
BURLINGTON	14			20	15		49
CHAMPION		1					1
CHURCHLAND		2					2
CLINGMAN		1					1
COLERIDGE		1					1
COOLEEMEE		1					1
COURTNEY		1					1
CRESTON		1					1
DANBURY		1					1
DENTON		1					1
DOBSON		1					1
EAST BEND		1					1
EDEN		3					3
ELKIN		3			1		4
FARMER		1					1
FORBUSH		1					1
GATEWOOD				1			1
GIBSONVILLE		2			1		3
GLADE CREEK		1					1
GREENSBORO	30		6	63	38		137
HAYS		1					1
HIGH POINT	2	24			12		38
IJAMES		1					1
JACKSON CREEK		1					1
JULIAN	1			1			2
KERNERSVILLE	5	3					8
KIMESVILLE	1			1			2
KING		2					2
LANSING		1					1
LEVEL CROSS		3					3
LEWISVILLE		2					2
LEXINGTON	2	13			4		19
LIBERTY (RANDOLPH)		1					1
LOMAX		2					2
MADISON		3					3
MILTON				1			1
MOCKSVILLE	1	1					2
MONTICELLO	3			1			4
MOUNT AIRY		4			1		5
MULBERRY		1					1
NATHANS CREEK		1					1
NORTH WILKESBORO	2	5			2		9
OLDTOWN		3					3

Source: Local Exchange Routing Guide

RATE CENTER TABLE

PILOT MOUNTAIN		1				1
PISGAH		1				1
PROSPECT HILL		1				1
QUAKER GAP		1				1
RAMSEUR		1				1
RANDLEMAN		2				2
RED BRUSH		1				1
REEDS		2				2
REIDSVILLE	5		7	6		18
ROARING GAP		1		1		2
ROXBORO		6		4		10
RUFFIN			1			1
RURAL HALL		1				1
SANDY RIDGE		1				1
SAXAPAHAW	1		1			2
SCOTTVILLE		1				1
SEAGROVE		1				1
SHOALS		2				2
SOUTHMONT		1				1
SPARTA		2				2
STANLEYVILLE		1				1
STATE ROAD		1				1
STONEVILLE		1				1
SUMMERFIELD	2		2			4
THOMASVILLE	1	4				5
TIMBERLAKE		1				1
WALKERTOWN	1	1				2
WALNUT COVE		1				1
WELCOME		1				1
WEST JEFFERSON		2				2
WESTFIELD		1				1
WINSTON SALEM	22		2	60	32	116
YADKINVILLE		2				2
YANCEYVILLE		1		1		2
ZEPHYR		2				2
(blank)						
Grand Total	97	163	9	160	127	556

Attachment #6

North Carolina 336 NPA Relief Meeting

**Ten-Digit Dialing Matrix
Submitted by BellSouth**

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SEP 07 2000
CHIEF CLERK
N.C. UTILITIES COMMISSION

BELLSOUTH'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA) FOR GREENSBORO	Greensboro BSA/ELCA Exchanges Located Within Same Portion of Relief As Greensboro			
	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Advance	X			
Anderson	X		X	X
Asheboro	X		X	X
Burlington	X		X	X
Danbury	X			
Denton	X		X	
Eden	X			
Farmer	X		X	
Gibsonville	X		X	X
Greensboro	X	X	X	X
High Point	X	X		X
Jackson Creek	X		X	
Julian	X		X	X
Kernersville	X			
Kimesville	X		X	X
King	X			
Lewisville	X			
Lexington	X			
Liberty	X		X	X
Madison	X			
Mebane (Located in 919; existing 10-Digit-Dialed Cross-NPA)				
Monticello	X		X	
Oldtown	X			
Pisgah	X		X	
Prospect Hill	X		X	X
Quaker Gap	X			
Ramseur	X		X	X
Randleman	X		X	X
Reeds	X			
Reidsville	X		X	
Ruffin	X		X	
Rural Hall	X			
Sandy Ridge	X			
Saxapahaw	X		X	X
Seagrove	X		X	X
Southmont	X			
Stanleyville	X			

BELLSOUTH'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA) FOR GREENSBORO	Greensboro BSA/ELCA Exchanges Located Within Same Portion of Relief As Greensboro			
	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Stoneville	X			
Summerfield	X		X	
Thomasville	X			
Walkertown	X			
Walnut Cove	X			
Welcome	X			
Winston-Salem	X	X		
Yanceyville	X		X	X
There are 45 Exchanges in The Greensboro BSA/ELCA				
FOR EACH RELIEF ALTERNATIVE:				
Number of Greensboro BSA/ELCA Exchanges Located Within Same Portion of Relief as Greensboro	44	3	22	15
Number of Greensboro BSA/ELCA Exchanges Located Cross-NPA From Greensboro	1	42	23	30
Percent of Greensboro BSA/ELCA Exchanges Located Within Same Portion of Relief as Greensboro	100%	7%	50%	34%
*Alternative Descriptions:				
Alternative #1 Distributed Overlay				
Alternative #2 Geographic Split - Winston-Salem, Greensboro and High Point				
Alternative #3 Geographic Split - High Point "A"				
Alternative #4 Geographic Split - High Point "B"				
Prepared by: Pam Smith, BellSouth, 704-417-7554				

BELLSOUTH'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA) FOR WINSTON-SALEM	Winston-Salem BSA/ELCA Exchanges Located Within Same Portion of Relief As Winston-Salem			
	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Advance	X		X	X
Asheboro	X			
Beulah	X		X	X
Boonville	X		X	X
Brooks	X		X	X
Churchland	X		X	X
Cooleemee	X		X	X
Courtney	X		X	X
Danbury	X		X	X
Denton	X			X
Dobson	X		X	X
East Bend	X		X	X
Eden	X		X	X
Elkin	X		X	X
Farmer	X			X
Forbush	X		X	X
Gibsonville	X			
Greensboro	X	X		
High Point	X	X	X	
Ijames	X		X	X
Jackson Creek	X			X
Julian	X			
Kernersville	X		X	X
Kimesville	X			
King	X		X	X
Level Cross	X		X	X
Lewisville	X		X	X
Lexington	X		X	X
Madison	X		X	X
Mocksville	X		X	X
Monticello	X			X
Mt. Airy	X		X	X
Oldtown	X		X	X
Pilot Mountain	X		X	X
Quaker Gap	X		X	X
Randleman	X			
Red Brush	X		X	X
Reeds	X		X	X
Reidsville	X			X
Rural Hall	X		X	X

BELLSOUTH'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA)	Winston-Salem BSA/ELCA Exchanges Located Within Same Portion of Relief As Winston-Salem			
FOR WINSTON-SALEM	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Sandy Ridge	X		X	X
Shoals	X		X	X
Southmont	X		X	X
Stanleyville	X		X	X
State Road	X		X	X
Stoneville	X		X	X
Summerfield	X			X
Thomasville	X		X	X
Walkertown	X		X	X
Walnut Cove	X		X	X
Welcome	X		X	X
Westfield	X		X	X
Winston-Salem	X	X	X	X
Yadkinville	X		X	X
Zephyr	X		X	X
There are 55 Exchanges In The Winston-Salem BSA/ELCA				
FOR EACH RELIEF ALTERNATIVE:				
Number of Winston Salem BSA/ELCA Exchanges Located Within Same Portion of Relief as Winston-Salem	55	3	43	48
Number of Winston-Salem BSA/ELCA Exchanges Located Cross-NPA From Winston-Salem	0	52	12	7
Percent of Winston-Salem BSA/ELCA Exchanges Located Within Same Portion of Relief as Winston-Salem	100%	5%	78%	87%
*Alternative Descriptions:				
Alternative #1 Distributed Overlay				
Alternative #2 Geographic Split - Winston-Salem, Greensboro and High Point				
Alternative #3 Geographic Split - High Point "A"				
Alternative #4 Geographic Split - High Point "B"				
Prepared by: Pam Smith, BellSouth, 704-417-7554				

NORTH STATE TELEPHONE COMPANY'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA) FOR HIGH POINT	High Point BSA/ELCA Exchanges Located Within Same Portion of Relief As High Point			
	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Advance	X		X	
Asheboro	X			X
Badin Lake	X			
Burlington	X			X
Churchland	X		X	
Courtney	X		X	
Danbury	X		X	
Denton	X			
East Bend	X		X	
Eden	X		X	
Farmer	X			
Forbush	X		X	
Gibsonville	X			X
Greensboro	X	X		X
High Point	X	X	X	X
Jackson Creek	X			
Julian	X			X
Kernersville	X		X	
Kimesville	X			X
King	X		X	
Lewisville	X		X	
Lexington	X		X	
Liberty	X			X
Madison	X		X	
Monticello	X			
Oldtown	X		X	
Pilot Mountain	X		X	
Pisgah	X			
Quaker Gap	X		X	
Ramseur	X			X
Randleman	X			X
Reeds	X		X	
Reidsville	X			
Rural Hall	X		X	
Sandy Ridge	X		X	
Saxapahaw	X			X
Seagrove	X			X
Shoals	X		X	
Southmont	X		X	

NORTH STATE TELEPHONE COMPANY'S BASIC SERVICE AREA (BSA) AND EXPANDED LOCAL CALLING AREA (ELCA) FOR HIGH POINT	High Point BSA/ELCA Exchanges Located Within Same Portion of Relief As High Point			
	Alternative #1*	Alternative #2*	Alternative #3*	Alternative #4*
Stanleyville	X		X	
Stoneville	X		X	
Summerfield	X			
Thomasville	X		X	
Walkertown	X		X	
Walnut Cove	X		X	
Welcome	X		X	
Winston-Salem	X	X	X	
Yadkinville	X		X	
There are 48 Exchanges In The High Point BSA/ELCA				
FOR EACH RELIEF ALTERNATIVE:				
Number of High Point BSA/ELCA Exchanges Located Within Same Portion of Relief as High Point	48	3	29	12
Number of High Point BSA/ELCA Exchanges Located Cross-NPA From High Point	0	45	19	36
Percent of High Point BSA/ELCA Exchanges Located Within Same Portion of Relief as High Point	100%	6%	60%	25%
*Alternative Descriptions:				
Alternative #1 Distributed Overlay				
Alternative #2 Geographic Split - Winston-Salem, Greensboro and High Point				
Alternative #3 Geographic Split - High Point "A"				
Alternative #4 Geographic Split - High Point "B"				
Prepared by: Pam Smith, BellSouth, 704-417-7554				

NEUSTAR

46000 Center Oak Plaza • Sterling

Petitioner's Exhibit 3

I/A

ORIGINAL

June 17, 2003

By Overnight Courier Clerk's Office
N.C. Utilities Commission

OFFICIAL COPY

Ms. Geneva Thigpen
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, North Carolina 27603

FILED

JUN 18 2003

Clerk's Office
N.C. Utilities Commission

Re: P100-Sub137C: Petition for Approval of NPA
Relief Plan for the 336 Area Code

Dear Ms. Thigpen:

NeuStar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby notifies the North Carolina Utilities Commission ("Commission") that the 336 numbering plan area ("NPA") code is not projected to exhaust within the next five years. As such, pursuant to industry guidelines, the Industry¹ or the Commission may request in writing to NANPA that the NPA relief plan for the 336 NPA be withdrawn.

On September 7, 2000, NANPA filed a petition ("Petition") in the above-referenced docket on behalf of the Industry requesting that the Commission approve the Industry's recommended all-services distributed overlay relief plan. The Petition stated that according to the 2000 Central Office Code Utilization Survey, the 336 NPA was projected to exhaust during the fourth quarter of 2002. On June 2, 2003, NANPA released the 2003 NRUF and NPA Exhaust Analysis ("2003 NRUF Analysis"), which incorporated updated actual and projected demand for numbering resources submitted to NANPA by the Industry. According to the 2003 NRUF Analysis, the 336 projected exhaust date was pushed back to second quarter 2009.² The extension of the projected

¹ The Industry is comprised of telecommunications entities operating in or considering operations within the 336 NPA in North Carolina.

² 2003 NRUF and NPA Exhaust Analysis (June 2, 2003) ("2003 NRUF Analysis"). Due to a change in Federal Communications Commission regulations, the NRUF Analysis replaced the Central Office Code Utilization Survey in 2000. See, *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 00-104 (March 31, 2000) at ¶5.

Comm-2
Sessions

NEUSTAR™

Port (dus)
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Drew
Spencer
AG
Bernard
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Spencer
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Sigfred
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TBrown
Paschal
Drew
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Legal - 2
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exhaust is due in part to the implementation of thousands block pooling in February of 2002 and a continued decrease in demand for numbering resources.

The Industry Numbering Committee ("INC") revised the guidelines, which NANPA is required to follow for NPA relief planning purposes, to allow for a mechanism to withdraw NPA relief petitions filed with state commissions if the NPA is not projected to exhaust within five years based upon a non-rationed forecast and the state commission has not approved the petition.³ Pursuant to those guidelines, NANPA hereby notifies the Commission (and the Industry via posting a copy of this letter on NANPA's Document Distribution Service) that 1) the projected exhaust date for the 336 NPA is more than five years from the date of this letter, 2) the NPA is not in jeopardy, 3) the Commission has not yet acted on the Industry's Petition, and 4) 173 central office codes remain available for assignment in the 336 NPA. As such, if NANPA receives a written request from the Commission or at least two Industry members⁴ to rescind the Petition, NANPA expeditiously will convene an Industry conference call for the purpose of gaining Industry consensus to withdraw the relief plan and forward the results of that meeting to the Commission.

³ The guidelines state:

During the period of time after NANPA has filed an industry relief plan recommendation with a regulatory authority but before the regulator has approved the plan, the NANPA may determine that the NPA will not exhaust in the next five years based on a non-rationed forecast. Events may have taken place such as a reduction in code demand, the return of codes, and or the implementation of number conservation, e.g., rate center consolidation, number pooling, that result in moving the NPA exhaust forecast outward significantly into the future.

NANPA will notify the industry and regulatory authorities when such a determination is made. In this notification, NANPA will provide the number of codes available in the NPA and a new projected NPA exhaust date. Upon notification from the NANPA, local industry (per section 5.5.1) or a regulatory authority may request in writing that the NPA relief plan be rescinded. If requested by a state regulator or the industry to withdraw a filed, unapproved relief plan, NANPA will convene a conference call for the purpose of gaining industry consensus to withdraw the relief plan petition under the following conditions:

- (a) The forecasted exhaust of the NPA is at least five years in the future, and,
- (b) The NPA is not in jeopardy.


NPA Code Relief Planning & Notification Guidelines, INC97-0404-016, §5.10 (Industry Numbering Committee, August 16, 2002) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines can be accessed on the Alliance for Telecommunications Industry Solutions at www.atis.org.

⁴ NPA Relief Planning Guidelines at §5.5.1.

Ms. Thigpen
June 17, 2003
Page 3

Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,

A handwritten signature in cursive script, reading "Kimberly Wheeler Miller".

Kimberly Wheeler Miller
Director, Regulatory Law and Public Policy

cc: Service List
Interested Industry members
(via NANPA's Document Distribution Service)

I, Kimberly Wheeler Miller, do hereby certify that complete copies of the foregoing letter were delivered, by First Class Mail, on this 17th day of June, 2003, to the following:

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Alicia Janowski
Reclamation Manager
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NANPA
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Kimberly Wheeler/Miller

neustarTM

*- Petitioner's Exhibit 5 -
I/A*

OFFICIAL COPY

July 19, 2013

By Overnight Courier

Gail L. Mount, Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building, Fifth Floor
Raleigh, North Carolina 27603

FILED

JUL 23 2013

Clerk's Office
N.C. Utilities Commission

Re: P-100 Sub 137C

Dear Ms. Mount:

By this letter and in an effort to update the record in the above-referenced docket, Neustar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), notifies the North Carolina Utilities Commission ("Commission") that the projected exhaust date for the 336 numbering plan area ("NPA") code has been revised to second quarter 2016.

On September 7, 2000, NANPA filed a petition ("Petition") in the above-referenced docket on behalf of the telecommunications industry ("Industry")¹ requesting that the Commission approve the Industry's recommended all-services distributed overlay relief plan for the 336 NPA.² The Petition stated that according to the data available at that time, the 336 was projected to exhaust during the fourth quarter of 2002. However, the implementation of numbering conservation measures, including thousands block number pooling in 2002, and a decrease in demand for numbering resources, extended the projected exhaust date significantly. In fact, on June 24, 2004, Neustar notified the Commission that the 336 NPA was not projected to exhaust within the next five years.³

Most recently, NANPA released the April 2013 NRUF (Numbering Resource Utilization and Forecast) and NPA Exhaust Analysis ("2013 NRUF Analysis"),⁴ which incorporated updated actual and projected demand for numbering resources submitted to NANPA by the Industry. According to the 2013 NRUF Analysis, the 336 projected exhaust date is the second quarter of 2016, less than 36 months in the future. Under its federal contract, NANPA is required to begin

¹ The Industry is comprised of telecommunications entities operating in or considering operations within the 336 NPA in North Carolina.

² The Petition is pending before the Commission.

³ Letter to Geneva Thigpen, North Carolina Utilities Commission, from Kimberly Wheeler Miller, Neustar, dated June 24, 2004 filed in docket P100-Sub137C.

⁴ 2013 NRUF and NPA Exhaust Analysis (April 2013) ("2013 NRUF Analysis"). The 2013 NRUF Analysis can be accessed at www.nanpa.com.

relief planning for area codes 36 months prior to the projected exhaust. Because we are within the 36 month relief planning window, NANPA takes this opportunity to update the information regarding the projected exhaust dates of the four relief alternatives set forth in the original Petition.

Relief Alternatives	Original Projected Exhaust as set forth in the 2000 Petition	Projected Exhaust based upon the April 2013 NRUF Analysis
Alternative #1 Distributed Overlay	9 years	43.9 years
Alternative #2 Geographic Split	Area A – 9 years Area B – 8 years	Area A – 46.0 years Area B – 41.9 years
Alternative #3 Geographic Split	Area A – 8 years Area B – 9 years	Area A – 40.1 years Area B – 47.8 years
Alternative #4 Geographic Split	Area A – 9 years Area B – 8 years	Area A – 42.3 years Area B – 45.5 years

For ease of reference, attached hereto is an updated version of the Initial Planning Document that was included with the Petition as Attachement #5 to Exhibit A. Also included are maps of the alternatives with the updated projected lives.

Thank you for your attention to this matter. If you have any questions, please contact the undersigned. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

Respectfully submitted,

/s/

Kimberly Wheeler Miller
Assistant General Counsel
Neustar, Inc.

Enclosure

cc: Service List

REFRESHED

336 NPA - RELIEF ALTERNATIVES

North Carolina
Numbering Plan Area Born on Date: December 15, 1997

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE April 2013
PROJECTED EXHAUST DATE 2Q2016
ANNUALIZED CODE DEMAND PROJECTION 21
MONTHLY CO CODE DEMAND PROJECTION 1.8
NXX Assignment data May 1, 2013

CURRENT DIALING PLAN

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)

Overlay Alternative

Alternative # 1

Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 336 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code 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 336 NPA all code assignments will be made in the new overlay area code.

Total codes at Exhaust = 762

Area code life in years = 43.9

Split Alternatives

The following three alternatives all involve the use of geographic splits. A split occurs when one geographic area receives a new NPA, while the other retains the current 336 NPA. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit local dialing could be permitted.

Alternative #2

Geographic Split – Winston-Salem, Greensboro, and High Point

The split boundary line runs around the three rate centers, creating a “circle”. Inside the “circle”, Area B, local calling could remain 7-digits.

Area A, Northeast of the split line

Total codes at Exhaust = 355

Area code life in years = 46.0

Area B, Southwest of the split line

Total codes at Exhaust = 355

Area code life in years = 41.9

Alternative #3

Geographic Split – High Point “A”

The split boundary line runs along rate center boundaries in a northeastern/southwestern direction. The High Point Rate Center is on the west or, “A”, side. The rate centers of Summerfield, Monticello, Reidsville, Madison, Gatewood, Sandy Ridge, and Ruffin are located on side “B”, east of the split line

Area A, West of Split Line

Total codes at Exhaust = 360

Area code life in years = 40.1

Area B, East of Split Line

Total codes at Exhaust = 350

Area code life in years = 47.8

Alternative #4

Geographic Split – High Point “B”

This split is similar to Alternative #3 above. The split boundary line runs along rate center boundaries in a north/south direction, more-or-less. The High Point Rate Center is on the east or, “B”, side. Also, the rate centers of Summerfield, Monticello, Reidsville, Gatewood, and Ruffin are located on side “A”, west of the split line.

Area A, West of Split Line

Total codes at Exhaust = 364

Area code life in years = 42.3

Area B, East of Split Line

Total codes at Exhaust = 346

Area code life in years = 45.5

336 NPA - RELIEF ALTERNATIVES

North Carolina

PROJECTED LIVES OF RELIEF ALTERNATIVES IN YEARS

Alternative	Area A	Area B	Overlay
#1	-	-	43.9
#2	46.0	41.9	
#3	40.1	47.8	
#4	42.3	45.5	

ALTERNATIVE # 1 DISTRIBUTED OVERLAY



NPA 336 Map Legend




- NPA Boundaries
- Rate Center Boundaries

Alter1	Projected Life
Overlay	43.9 Years

**ALTERNATIVE # 2
NPA SPLIT**



NPA 336 Map Legend




-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

Alter2	Projected Lives
AREA A	46.0 Years
AREA B	41.9 Years

ALTERNATIVE # 3 NPA SPLIT



NPA 336 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

Alter3	Projected Lives
AREA A	43.2 Years
AREA B	44.6 Years

NPA 336 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Alter4 Projected Lives

Alter4	Projected Lives
AREA A	42.3 Years
AREA B	45.5 Years



I, Kimberly Wheeler Miller, do hereby certify that complete copies of the foregoing letter were delivered, by First Class Mail, on this 19th day of July, 2013, to the following:

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/s/

Kimberly Wheeler Miller