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July 19, 2013

FILED

JUL 22 2013

Clerk's Office
N.C. Utilities Commission

By Overnight Courier

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

Re: P-100 Sub 137C

Dear Ms. Mount:

Clerk's
AG
Comm
Watson
Hinton
Hoover
Kite
Hilburn
Sessoms
Paschal
Wisfall
Ex Dir
3/S Legal
3/S Acct
2/S Econ
3/S Comm

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,

Kimberly Wheeler Miller
Assistant General Counsel
Neustar, Inc.

Enclosure

cc: Service List

REFRESHED
336 NPA - RELIEF ALTERNATIVES

FILED
JUL 22 2013
Clerk's Office
N.C. Utilities Commission

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	

North Carolina NPA 336 Rate Center Map

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ALTERNATIVE # 1 DISTRIBUTED OVERLAY

NPA 336 Map Legend

NPA Boundaries

Rate Center Boundaries

Alter1	Projected Life
Overlay	43.9 Years

Produced by CDS Business Mapping, LLC 04/2013

North Carolina NPA 336 Rate Center Map

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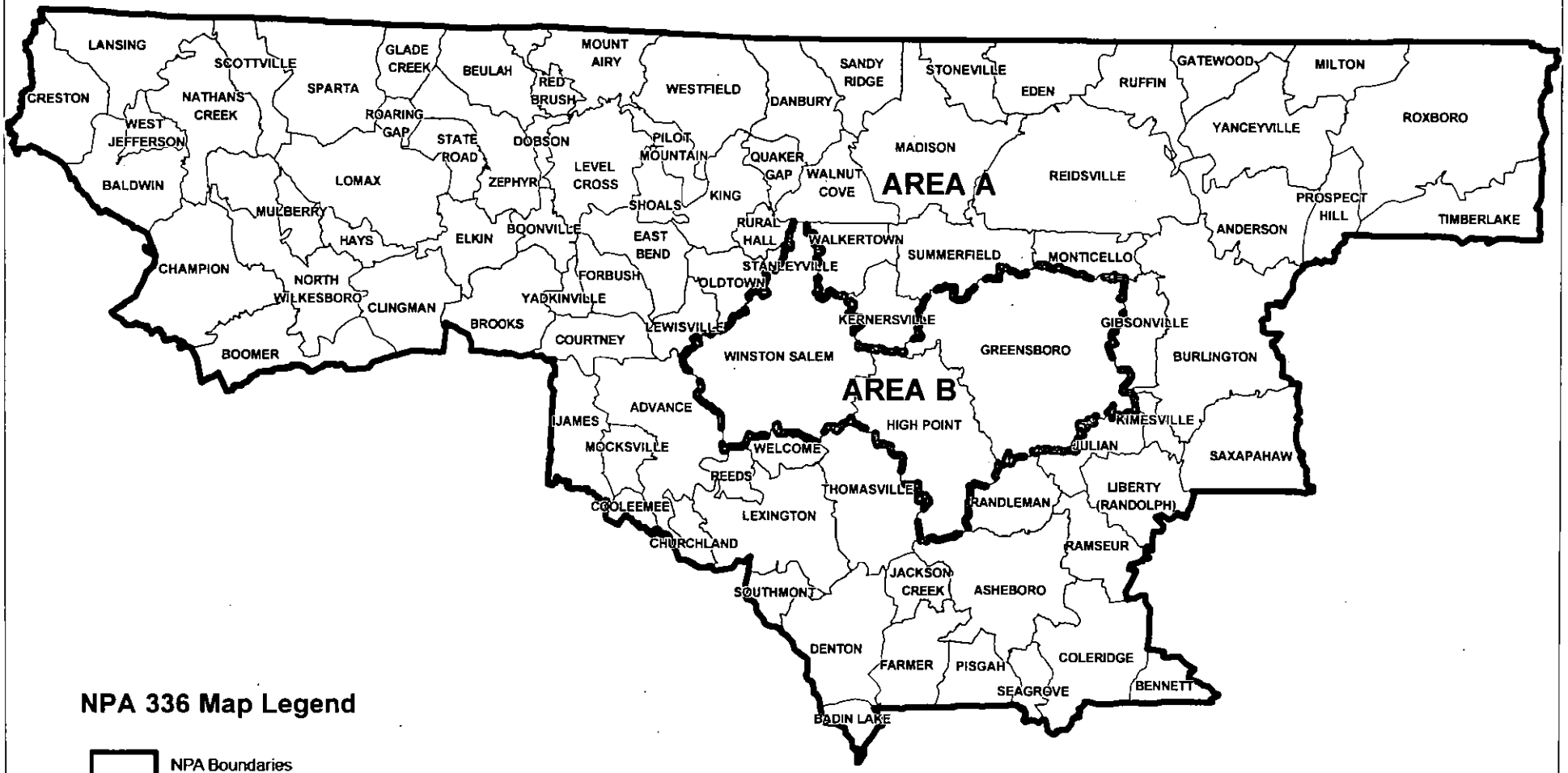
ALTERNATIVE # 2
NPA SPLIT



NPA 336 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alter2	Projected Lives
AREA A	46.0 Years
AREA B	41.9 Years

Produced by CDS Business Mapping, LLC 04/2013

North Carolina NPA 336 Rate Center Map

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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

Produced by CDS Business Mapping, LLC 04/2013

North Carolina NPA 336 Rate Center Map

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ALTERNATIVE # 4
NPA SPLIT

NPA 336 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alter4	Projected Lives
AREA A	42.3 Years
AREA B	45.5 Years

Produced by CDS Business Mapping, LLC 04/2013

North Carolina NPA 336 Rate Center Map, County

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NPA 336 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries

Produced by CDS Business Mapping, LLC 04/2013

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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