

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

04/09/21
04:59 PM

A2104007

Application of the North American)
Numbering Plan Administrator, on)
behalf of the California)
Telecommunications Industry, for)
Relief of the 209 Numbering Plan Area)

Docket No. _____

APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN
ADMINISTRATOR, ON BEHALF OF THE CALIFORNIA
TELECOMMUNICATIONS INDUSTRY, FOR RELIEF OF THE 209
NUMBERING PLAN AREA

Kimberly Wheeler Miller
Counsel for North American Numbering Plan
Administrator
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
844-Hi-Kimberly or 844-445-4623
kmiller@somos.com

Heidi A. Wayman
Manager, Data Management
North American Numbering Plan
Administrator
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
(571) 363-3824
hwayman@somos.com

Dated: April 9, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of the North American)	
Numbering Plan Administrator, on)	
Behalf of the California)	Docket No. _____
Telecommunications Industry, for)	
Relief of the 209 Numbering Plan Area)	

**APPLICATION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE CALIFORNIA TELECOMMUNICATIONS
INDUSTRY FOR RELIEF OF THE 209 NUMBERING PLAN AREA**

The North American Numbering Plan Administrator (“NANPA”), as the neutral third party numbering plan area code relief planner for California and on behalf of the California telecommunications industry (“Industry”),¹ hereby notifies the California Public Utilities Commission (“Commission”)² that the 209 numbering plan area code (“NPA”) serving a portion of central California is projected to exhaust its central office codes by the fourth quarter of 2022 and is in need of relief. This means that absent NPA relief, the supply of central office codes (often referred to as “CO” or “NXX” codes) in the 209 NPA is projected to run out during the projected exhaust quarter. In accordance with Industry guidelines, only an overlay will meet the requirements for relief of the 209 NPA, which is scheduled to transition to mandatory 1+10-digit dialing due to the national implementation of 988 to reach the national suicide prevention and mental

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 209 NPA.

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

health crisis lifeline.³ The Industry respectfully requests that the Commission expeditiously approve the Industry's plan to implement the overlay as set forth herein, no later than November 1, 2021.

The Industry recommends that it implement the new NPA based upon a 9-month implementation schedule that would start on January 1, 2022, after mandatory 1+10-digit dialing customer education has been completed in the 209 NPA.⁴ Adhering to this Industry agreed-upon schedule will allow the new NPA to be implemented just prior to the projected exhaust of the 209 NPA,⁵ while allowing the Industry to complete the 1+10-digit dialing implementation before starting the implementation of the new NPA and avoid service providers' holiday network freezes at the end of 2021 and 2022.⁶

Background: The 209 NPA serves portions of the Alameda, Alpine, Amador, Calaveras, Eldorado, Escalon, Fresno, Madera, Mariposa, Merced, Sacramento, San Joaquin, Stanislaus, and Tuolumne counties and encompasses cities including but not limited to Modesto, Stockton and Tracy . The 209 NPA was created in 1959 when it was split off of the 415 NPA, one of the three original NPAs in California.

³ See NANPA Planning Letter 556 published on the NANPA website at https://nationalnanpa.com/pdf/PL_556.pdf

⁴ Under the industry 1+10-digit dialing transition implementation plan for 988 implementation, customers will be educated to expect that mandatory 1+10-digit dialing will begin on October 24, 2021. Service providers will then have between October 24, 2021 and July 15, 2022 to remove 7-digit dialing in the 209 NPA from their networks. See the 988 milestones posted on the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html.

⁵ The NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Apr. 9, 2021) ("NPA Relief Planning Guidelines") require that relief be implemented six months prior to exhaust, but the new NPA cannot be implemented prior to July 15, 2022.

⁶ Many service providers institute network "freezes" from around Thanksgiving to mid-January each year to avoid making any significant changes to the network that might impact customers over the holidays.

As required by the FCC, NANPA collects area code and CO code assignment and utilization data, develops projected demand for numbering resources and publishes the projected exhaust of each area code twice a year. In October 2020 NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2020 NRUF Report”) which indicated that the 209 NPA will exhaust during the fourth quarter of 2023.⁷ Due to an increase in CO code requests in the 209 NPA, NANPA published a delta NRUF on December 15, 2020 revising the forecasted exhaust to fourth quarter 2022. As a result, NANPA declared the 209 NPA to be in jeopardy status on December 16, 2020.⁸ Because the 209 NPA is in jeopardy, NANPA convened⁹ an Industry meeting via web conference on March 4, 2021 to plan for relief of the NPA.¹⁰

The 209 NPA is scheduled to transition to mandatory 1+10-digit dialing by July 15, 2022 as a result of the FCC’s Order approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis

⁷ October 2020 NRUF and NPA Exhaust Analysis (“October 2020 NRUF Report”). The October 2020 NRUF Report can be accessed on the NANPA web site at <https://www.nanpa.com>.

⁸ When demand for CO codes exceeds projections and there is insufficient time to implement a relief plan before exhaust, NANPA may declare jeopardy (which may involve rationing of CO code assignments) to conserve the numbering resource until relief can be fully implemented.

⁹ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Relief Planning Guidelines, which assist NANPA, the Industry, and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://www.atis.org/01_committ_forums/inc/documents/. NANPA is responsible for initiating area code relief within four weeks of a jeopardy declaration. NPA Relief Planning Guidelines at §5.1.

¹⁰ NANPA’s invitation to the March 4, 2021 relief planning meeting, including CO code assignment information, thousand-block pooling statistics, associated maps, and other relief materials is attached as Exhibit A. A copy of the March 4, 2021 meeting minutes is attached as Exhibit B.

hotline.¹¹ The NPA Relief Planning Guidelines were amended to accommodate the impact the national implementation of the 988 abbreviated dialing code and the associated 1+10-digit dialing transitions will have on area code relief. The amended NPA Relief Planning Guidelines state that “where NPA relief is required for a single NPA area and ... the NPA is scheduled to transition to 1+10-digit dialing...the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.”¹² Due to this change to the Guidelines, the only option for relief of the 209 NPA is an overlay. Therefore, the Industry reached consensus to recommend to the Commission that it issue an order approving the all-services overlay as the form of relief for the 209 NPA and the attached Public Education Program outlining the Industry’s implementation plan for the new NPA (see Attachment 1). The Industry’s implementation plan includes the relief implementation schedule so that the industry can accommodate holidays and holiday network freezes, high traffic days, and implementation dates for other NPA relief activities occurring in other parts of the country. The Industry’s implementation plan and schedule ensures that relief is implemented as soon as practicable to help mitigate the possibility of service providers running out of 209 numbers before relief is implemented and avoid implementation during holiday network freezes.

Description of the Overlay: The all-services overlay would superimpose a new NPA over the same geographic area covered by the existing 209 NPA and is

¹¹ Implementation of the National Suicide Hotline Improvement Act of 2018, Report and Order, FCC 20-100 (rel. July 17, 2020).

¹² NPA Relief Planning Guidelines at §5.6.3 (previously §5.6.2).

projected to last approximately 31 years. NANPA would not assign CO codes from the new overlay NPA until all assignable CO codes from the 209 NPA are exhausted. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. The implementation of an overlay requires mandatory 1+10-digit dialing for local calls, including calls within the same NPA. The 209 NPA will be transitioned to mandatory 1+10-digit dialing as a result of the national implementation of 988 to reach the national suicide prevention and mental health crisis lifeline and the Industry-recommended dialing plan set forth in the following table is consistent with that implementation:

Dialing Plan for the All-Services Overlay

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	1+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)

The Industry reached consensus to implement relief in accordance with a 9-month implementation schedule starting on January 1, 2022, which would start after mandatory 1+10-digit dialing customer education has been completed in the 209 NPA. The schedule includes specific dates to ensure that relief is implemented as soon as practicable, and to ensure the dates do not interfere with holidays or holiday network freezes, high traffic calling days, or other NPA relief implementation activities occurring across the country. Moreover, an expeditious approval of the instant Petition and adhering to the proposed implementation schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes. The Industry-agreed upon implementation schedule is set forth in the table below. It should be noted that there is no requirement for a permissive dialing period

because mandatory 1+10-digit dialing customer education will have already been completed by the time the 9-month implementation schedule begins.¹³

Implementation Schedule for an All-Services Overlay

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	January 1, 2022
Customer Education and Network Preparation Period Ends	October 1, 2022
Effective date of the new NPA (and earliest possible CO code activation)*	October 1, 2022
Earliest Date CO codes in the new NPA may be requested from NANPA	July 27, 2022

** CO codes in the new NPA will not be assigned until all available codes in the 209 NPA have been exhausted.*

Conclusion: The Industry requests that the Petition and its attached Public Education Program (PEP) be granted expeditiously. Once the Commission has granted this petition and PEP, the NANPA will host its industry initial implementation meeting and the Industry will implement an all-services overlay over the 209 NPA in accordance with the implementation schedule set forth above. As such, the industry requests that the Commission grant this petition no later than November 1, 2021.

¹³ Customer education about mandatory 1+10-digit dialing will be completed in September 2021. See industry milestones posted to the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html.

Respectfully submitted,

Kimberly Miller

Kimberly Wheeler Miller

Counsel for

North American Numbering Plan
Administrator

2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
844-Hi-Kimberly or 844-445-4623
kmiller@somos.com

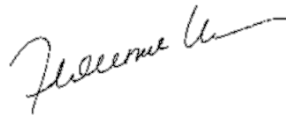
Heidi Wayman
NANPA
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
571-363-3824
hwayman@nationalnanpa.com

April 9, 2021

VERIFICATION

I, Florence Weber, hereby state the following under penalty of perjury. I am Senior Director of the North American Numbering Plan Administrator, Somos, Inc. I am authorized to make this verification on behalf of the North American Numbering Plan Administrator. I have read the foregoing “Application of the North American Numbering Plan Administrator, on behalf of the California Telecommunications Industry, for Relief of the 209 Numbering Plan Area” (the “Application”). To the best of my personal knowledge, except as to the matters which are therein stated on information or belief, based on personal information and communications with and information provided by appropriate NANPA personnel, I believe the facts stated in the Application to be true and correct.

By:



Date: April 9, 2021

ATTACHMENT 1 – Public Education Plan for 909-209 Area Code Relief

(As amended per CPUC staff approval granted during implementation* CPUC staff may grant amendments as needed during implementation)

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
1	Effective date of decision approving <u>909-209</u> area code overlay	NA	NA		Date of Decision (DOD)	<u>No later than 11/01/2021</u>	<u>To allow an Implementation Start Date (ISD) of 01/01/2022</u>
2a	Task Force Finance Subcommittee to send emails to service providers requesting invoicing information and confirmation of 909 numbering resources in inventory as of DOD	Service providers holding blocks/codes in 909 as of DOD	Shared		3 weeks after Implementation Start Date (ISD)		<p><u>209 customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation (and without paid advertising); see Milestones #3, 4, 6, 7, 8, 9, 12, 13, 18, 19, 22, 23, 25 and 27 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html.</u></p> <p><u>Educating 209 customers about the new area code is just informational after 10/24/21. No paid advertising is necessary to educate customers about the new area code, as carriers can use other no cost methods such as bill inserts or bill messages, press releases, and carrier website postings to do so. Thus a funded PEP and Activities #2a, 2b, 7, 12 and 15 here are not necessary.</u></p> <p><u>It would be virtually impossible to implement a funded PEP within the recommended 9-month implementation schedule.</u></p>
2b	Respond to Task Force Finance Subcommittee with billing information and confirmation of 909 numbering resources	Service providers holding blocks/codes in 909 as of DOD	Individual		2 weeks after ISD 5 weeks after ISD*		<u>See explanation above in Activity #2a</u>
3	NANPA <u>909-209</u> implementation meeting, and request for industry participation on PEP task force and subcommittees. Determination of ISD.	CPUC Staff and Industry	Shared		3 weeks after DOD	<u>No later than 12/15/2021</u>	<u>Implementation Start Date (ISD) = 01/01/2022</u>

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
4	Overlay information distributed internally as job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual		1 month after ISD	02/01/2022	
5	909-209 overlay update to industry websites	All customers	Individual		3 months after ISD	04/01/2022	
6	News release regarding the start of permissive dialing, announcing the 909-209 area code relief plan, and the 909-209 area code geographic boundaries, and the new overlay area code for issue within the 909-209 area code and adjacent area codes, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	All customers	Shared		5 months after ISD	05/01/2022	No permissive dialing period is needed because customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation. See Milestones #8 and #23 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.
7	Task Force Finance Subcommittee issue invoices for PEP fund payments to service providers holding blocks in 909 as of DOD.	Task Force Finance Subcommittee			4 months after ISD		See explanation above in Activity #2a
8	Customer Notification No. 1: Announce the new area code plan, including information about 1+10-digit dialing and indicate the affected areas, and the new area code effective key dates, and how customers should prepare for the overlay.	All customers	Individual		4-5 months after ISD ~5 months after ISD*	06/01/2022	Carriers shall run this first customer notice during their May 2022 billing cycles.

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
9	Provide by email targeted letters with the information in Customer Notification No. 1, along with PEP Task Force contact information, and an offer to provide industry speakers, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm service providers, (32) public safety organizations and PSAPs, (4) coin-operated pay telephone providers, (53) telephone directory publishers, and (64) California Relay Services throughout the 909-209 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/ activist organizations, chambers of commerce, city councils and other key government agencies, airports, alarm service providers, public safety organizations and PSAPs, coin-operated pay telephone providers, telephone directory publishers, and California Relay Services	Shared		4 months after ISD 3 months after ISD	<u>04/01/2022</u>	<u>No industry speakers have been requested in the last 4+ overlay implementations in California so the offer is unnecessary.</u> <u>Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to_10_digit_dialing_for_988/index.html.</u>
10	Begin Permissive Dialing			6 months after ISD on Saturday			<u>No permissive dialing period will be needed because 209 customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation. See Milestones #3, 4, 6, 7, 8, 9, 12, 13, 18, 19, 22, 23, 25 and 27 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to_10_digit_dialing_for_988/index.html.</u>
11	Published Directories: Add information on cover to alert customers in 909-209 area code <u>about the new overlay area code</u>	All customers	Individual		6 months after ISD	<u>07/01/2022</u>	
12	Remit full payment for PEP fund contribution	Service providers holding blocks/codes in 909 as of DOD			7 months after ISD		<u>See explanation above in Activity #2a</u>

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
13	Correct payphone signage to include updated dialing instructions	All customers	Individual		10 months after ISD		<u>This will have already been completed by 9/9/2021 due to the 988 implementation. See Milestones #3, 7, 18 and 21 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
14	News release <u>reminding the public of regarding the start of 1 + 10 digit mandatory dialing, the 909-209 area code relief plan, and the 909-209 area code geographic boundaries, and the new overlay area code</u> for issue within the <u>909-209</u> area code, adjacent area codes, and statewide, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	Statewide	Shared		11 months after ISD 11.5 months after ISD* ~8.5 months after ISD	~09/15/2022	<u>Mandatory 1+10-digit dialing will have already been implemented by 07/15/2022 due to the 988 implementation. See Milestones #33 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u> <u>This news release is just a reminder that the new overlay area code becomes effective on 10/01/2022.</u>
15	Disseminate information in relevant zoned editions of major newspapers, ethnic media, radio and television through paid advertising. (Note: The bulk of the information should be disseminated in the three weeks preceding the beginning of mandatory 1+10 digit dialing.)	All customers	Shared	6 months after ISD	12 months after ISD		<u>Paid advertising is not necessary to educate customers about the new overlay area code when mandatory 1+10-digit dialing will have already been implemented by 07/15/2022.</u> <u>Paid advertising would be virtually impossible to accomplish in the 9-month implementation schedule; The 9-month schedule provides the CPUC with as much time as possible to issue the Order and still allow the industry to get relief implemented before the holiday network freezes and 209 area code exhaust. Other no cost methods shall be used to educate customers about the new overlay area code becoming effective on 10/01/2022.</u>
16	Offer industry appearances on local radio or TV talk shows	All customers	Shared	10 months after ISD	12 months after ISD		<u>No industry appearances have been requested or made in the last 4+ overlay implementations in California so the offer is unnecessary.</u>

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
17	Customer Notification No. 2: <u>Announce Reminder of</u> the new area code plan, <u>including information about mandatory 1 + 10 digit dialing</u> and <u>indicate the affected areas, and the new area code key-effective dates, and how customers should prepare for the overlay.</u>	All customers	Individual		10 months after ISD <u>~10 months after ISD*</u> <u>9 months after ISD</u>	<u>10/01/2022</u>	<u>Carriers will run this reminder customer notice during their September 2022 billing cycles.</u>
18	Provide by email targeted letters with the information in <u>reminder</u> Customer Notification No. 2, along with PEP Task Force contact information, <u>and an offer to provide industry speakers</u> , to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, <u>airports</u> , and other key government agencies, (2) alarm service providers, (3) public safety organizations and PSAPs, (4) coin-operated pay telephone providers, (5) telephone directory publishers, and (6) California Relay Services throughout the 909-209 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, <u>airports, alarm service providers</u> , public safety organizations and PSAPs, <u>coin-operated pay telephone providers</u> , telephone directory publishers, and California Relay Services	Shared		10 months after ISD <u>9 months after ISD</u>	<u>10/01/2022</u>	<u>No industry speakers have been requested in the last 4+ overlay implementations in California so the offer is unnecessary.</u> <u>Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
19	<u>Complete implementation of recorded message announcing mandatory dialing</u>	<u>All customers</u>	<u>Individual</u>		10 months after ISD		<u>This Activity will have already been completed between 9/24/2021 and 6/15/2022 due to the 988 implementation. See Milestone #30 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
20	Begin Mandatory Dialing			<u>1 month before 909 overlay effective date</u>			<u>This Activity will have already been completed between 10/24/2021 and 7/15/2022 due to the 988 implementation. See Milestone #33 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
21	New NPA/Area Code assigned and implementation completed			13 months after ISD; 1 month after mandatory dialing	<u>9 months after ISD</u>	<u>10/01/2022</u>	<u>New overlay area code becomes effective on 10/01/2022.</u>

ATTACHMENT 2

COMPLIANCE WITH RULE 2.1(c)

In compliance with Rule 2.1(c) of the Commission's Rules of Practice and Procedure, the North American Numbering Plan Administrator, in its role as the neutral third party NPA Relief Planner for California under the North American Numbering Plan and on behalf of the California telecommunications industry ("Industry"), provides the following information:

Proposed Category: The Application should be categorized as a rate setting proceeding according to Rule 7.1(e)(2) which states in part "[w]hen a proceeding does not clearly fit into any of the categories as defined in Rules 1.3(a), (d), and (e), the proceeding will be conducted under the rules applicable to the rate setting category" unless otherwise determined by the Commission.

Need for Hearings: The Application does not raise any material issues of fact. Further, as explained in the Application, a recorded webcast regarding the relief plan will be made available on the California Public Utilities Commission's website on June 1, 2021 and mandatory 1+10-digit local dialing will be in place prior to the new NPA being implemented. Accordingly, hearings are not necessary.

Issues to be Considered: Whether the Commission should adopt the Industry's recommended all-services distributed overlay, with corresponding 9-month implementation schedule and customer education plan, as the preferred form of relief for the 209 numbering plan area ("NPA").

Proposed Schedule: NANPA projects that the 209 NPA will exhaust during the fourth quarter 2022. As explained in the Application, the Industry recommends a 9-month schedule to implement the all-services overlay. To ensure the Industry has

sufficient time to implement relief before the 209 NPA exhausts, the following schedule is proposed:

Application Filed April 9, 2021

Expiration of Protest Period August 1, 2021

Decision Issued November 1, 2021

EXHIBIT A

December 30, 2020

To: All 209 NPA Code Holders and Interested Industry Members (California)

Subject: California 209 NPA Draft Petition Review

The North American Numbering Plan Administrator (NANPA) has scheduled an area code relief planning meeting via conference call to provide the industry an opportunity to review and approve a draft petition to add a new NPA to the California 209 NPA which is projected to exhaust in 4Q2022. According to the ATIS INC NPA Code Relief Planning and Notification Guidelines (Section 5.6.2), NANPA is to prepare a draft petition for industry review.

NANPA will convene an industry relief planning meeting on March 4, 2021, to review and approve the draft petition for the 209 NPA. The resulting relief plan will be filed with the California Public Utilities Commission for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (ATIS) will be applied in the decision-making efforts.

The attached petition has been streamlined in accordance with Industry Guidelines in order to make the relief planning process easier for the industry and the Commission. In addition, we will be reviewing the customer and technical milestones during the relief planning meeting to reach consensus on which items will be included in the minutes which will be attached as an exhibit to the petition.

Also attached with this notice is an agenda along with the consensus process, relief planning meeting aids, sections of the California State Public Utility Code relating to area code relief planning and notification requirements, CO code summary, Pooling statistics report, service provider CO code assignments by OCN, customer and technical milestone worksheet and related maps.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on March 4, 2021. Past experience demonstrates that this could be the only meeting of the industry before a decision is reached on the petition that will be submitted to the California Public Utilities Commission for approval. The details of the relief planning meeting conference call are as follows:

Date: March 4, 2021

Time: 10:00 am PT; 11:00 am MT; 12:00 pm CT; 1:00 pm ET

Join Zoom Meeting

<https://somos.zoom.us/j/98118734222?pwd=YnpsT2R1bldjRUdtMWl4YTRhQzY5dz09&from=addon>

Meeting ID: 981 1873 4222
Password: 013956

One tap mobile
8778535257,,98118734222# US Toll-free
8884754499,,98118734222# US Toll-free

Dial by your location
877 853 5257 US Toll-free
888 475 4499 US Toll-free
855 703 8985 Canada Toll-free
Meeting ID: 981 1873 4222

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you receive this notice from someone else and would like to receive additional information in the future about the 209 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@somos.com.

Sincerely,

Heidi A. Wayman
NPA Relief Planner
NANPA

CC: Joanne Leung – CPUC Staff
Eric Van Wambeke – CPUC Staff

**CALIFORNIA 209 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL**

March 4, 2021 - 10:00 AM (PT)

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review INC Guidelines

Review 209 NPA Background, History and Status

Review of Draft Petition

Consensus on Customer Education & Technical Milestones

Consensus on Implementation Intervals

Review of State Law and Public Utility Code Notification Requirements

Schedule Virtual Local Jurisdiction and Public Meetings

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

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

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

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

- Meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

5.6 Notify Appropriate Regulatory Authority - When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory authority the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.

5.6.1 Where NPA relief is required for an existing overlay complex, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft petition. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.6.2 Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, or the NPA is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing⁵, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all Affected Parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g., an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks

⁵ For example, FCC 20-100, ¶53.

in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local⁶ and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

- 5.7 Approval by Appropriate Regulatory Authority – When the regulator issues an order for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.
- 5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:
- factual information about the impending exhaust of the NPA
 - and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some regulators may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating NPA boundaries and dialing procedures.

- 5.9 Industry NPA Relief Implementation Meeting – NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan. (NANPA, on its own initiative or using input from Service Providers, has the option to convene a

⁶ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.



Home	Bill Information	California Law	Publications	Other Resources	My Subscriptions	My Favorites
------	------------------	----------------	--------------	-----------------	------------------	--------------

Code: Section:

[Up^](#) [Add To My Favorites](#)

PUBLIC UTILITIES CODE - PUC

DIVISION 4. LAWS RELATING TO UTILITY CORPORATIONS AND THEIR EMPLOYEES [7503 - 8286] (*Division 4 enacted by Stats. 1951, Ch. 764.*)

CHAPTER 3.5. New Area Codes [7930 - 7943] (*Chapter 3.5 added by Stats. 1990, Ch. 199, Sec. 1.*)

7930. The Legislature finds and declares all of the following:

- (a) The explosive demand for new area codes in California requires more area codes to be established than was envisioned when this chapter and Section 2887 were enacted in 1990.
- (b) Because of the advent of competition in the local telecommunications market, and a decision by the Federal Communications Commission, new area codes are established by the North American Numbering Plan Administrator in conjunction with the commission and members of the telecommunications industry.
- (c) In order to eliminate potential confusion for all the parties involved in the process of establishing new area codes, the changes to this chapter enacted in the 1997–98 Regular Session include identifying “providers” in Section 7931.
- (d) The “providers” specified in Section 7931 include telephone corporations and resellers that are regulated by the commission, and paging companies that are not regulated by the commission. It is necessary to include all of these entities within the term “providers” in order to effectively meet the needs of the state as they relate to the establishment of new area codes. The Legislature does not, however, by including paging companies as “providers” in Section 7931, intend to expand the jurisdiction of the commission over paging companies beyond the requirements of this chapter. The Legislature continues to recognize the status of paging companies as unregulated entities.

(Repealed and added by Stats. 1998, Ch. 534, Sec. 3. Effective January 1, 1999.)

7931. (a) This chapter is applicable to telephone corporations, including resellers, and to paging companies, hereafter referred to as providers.

(b) For purposes of this chapter, “coordinator” means the “coordinator for California area code relief” as designated by the North American Numbering Council.

(c) Whenever the coordinator and providers evaluate the potential boundaries of a new area code, they shall consider rate area boundaries, municipal boundaries, communities of interest, and other appropriate criteria.

(d) When the coordinator determines the need to establish a new area code, at least 30 months prior to the projected opening of the new area code, the coordinator shall provide written notice to the commission regarding the need to establish the new area code.

(e) From the date the written notice required by subdivision (d) is received by the commission all of the following shall be done:

(1) Within three months all providers shall notify all affected customers in writing of the need to establish a new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed number.

(2) Within nine months the coordinator and the commission staff shall notify representatives of local jurisdictions and the public in affected geographic areas, and, at the discretion of the commission, may conduct one or more meetings both for representatives of local jurisdictions and for members of the public in affected geographic areas to inform them of the proposed area code relief options and of measures that may be taken to mitigate any potential disruptions, and to afford them the opportunity to discuss the potential impact of the proposed options.

(3) Within 11 months the coordinator shall file the results of the area code relief planning process with the commission requesting commission approval to implement a plan. Anyone may contest the results of the area code planning process by filing a written protest with the commission not later than 60 days after the results have been filed with the commission.

(f) Unless the commission determines otherwise, at least 12 months prior to the date adopted by the commission for opening the new area code, all of the following shall be done:

(1) The coordinator shall notify the general public of the specific geographic area to be included in both the old and new area codes. The notice shall include the schedule for any transitional dialing periods required by Section 7932.

(2) Each telephone provider serving the specific geographic area included in the existing area code shall give written notice to all its affected customers about the specific geographic area that will be included in the new area code. The notice shall include the schedule for any transitional dialing periods required by Section 7932, and the prefixes that will be contained in the new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed telephone number.

(g) Within three months prior to the adopted date for opening the new area code, each provider serving the existing area code shall give written notice to its affected customers of the specific geographic boundaries of the new area code. The notice shall include the schedule for any transitional periods required by Section 7932, and the prefixes that will be contained in the new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed number.

(Amended by Stats. 2017, Ch. 425, Sec. 13. (SB 385) Effective January 1, 2018.)

7932. (a) Whenever a provider opens a new area code, it shall do all of the following:

(1) If the new area code plan permits seven-digit dialing, provide for a transitional dialing period during which a number in the new area code, or a number in the existing area code, may be reached by dialing either the seven-digit called number, or the area code plus the seven-digit called number.

(2) Subsequent to the transitional dialing period provided in paragraph (1), if prefix codes are available, permit callers to reach a recorded announcement, without charge, that will inform the caller of the new area code when the existing area code is dialed.

(3) If the new area code plan requires 10-digit dialing within an area code, provide for any transitional dialing period or recorded announcements the commission may order.

(b) Paragraphs (1) and (2) of subdivision (a) shall no longer be operative if an authorized federal or state agency orders mandatory 10-digit dialing.

(Added by renumbering Section 7931 by Stats. 1998, Ch. 534, Sec. 5. Effective January 1, 1999.)

7933. The rate structure of any call originating in or made to an area code shall not change with the split of an area code into two or more area codes, regardless of the number of digits dialed.

(Added by renumbering Section 7932 by Stats. 1998, Ch. 534, Sec. 6. Effective January 1, 1999.)

7934. The Legislature finds and declares all of the following:

(a) The number of area codes in this state has more than doubled since 1991.

(b) The proliferation of area codes has caused undue hardship on citizens of this state, who have begun to be forced into new area codes after years of having the same telephone number.

(c) That proliferation has substantially increased costs to businesses, individuals, and government agencies.

(d) New area codes require the replacement of business cards and letterhead stationery, and companies must use employee time contacting their customers to ensure that those customers are able to continue to reach the affected company.

(e) The proliferation of area codes has also reduced worker productivity as employees begin using new and unfamiliar area codes.

(f) It is the policy of the Legislature that existing area codes should be preserved for as long as possible.

(g) It is the further policy of the Legislature that the hardship currently experienced by telecommunications customers as a result of the creation of new area codes should be alleviated.

(h) For all of the reasons stated above, it is necessary for the commission, as a public agency, to take all possible measures to protect area codes as a public resource, stop area code proliferation, and review their existing practice of establishing new area code regions and the creation of area code overlays.

(Added by Stats. 1999, Ch. 809, Sec. 2. Effective October 10, 1999.)

7935. (a) The commission shall develop and implement any measures it determines to be available for telephone corporations that possess prefixes to efficiently allocate telephone numbers within those prefixes. The commission shall consider the cost effectiveness of these measures before requiring implementation. Among the measures the commission shall consider are rate center consolidation, allocation of numbers in blocks smaller than 10,000, and unassigned number porting.

(b) For the purpose of this section, in accordance with the North American Numbering Plan, a telephone number consists of a three digit area code or number plan area (NPA), a three digit prefix or NXX code, and a four digit line number.

(Added by Stats. 1999, Ch. 809, Sec. 3. Effective October 10, 1999.)

7936. The commission shall direct the North American Numbering Plan Administrator to obtain utilization data for any area code for which a relief plan is proposed, prior to adopting a plan for, or setting a date for, relief.

(Added by Stats. 1999, Ch. 809, Sec. 4. Effective October 10, 1999.)

7938. The commission shall require, as an interim measure until the commission develops procedures for number pooling or adopts utilization standards, that number assignments made by telephone corporations to their customers shall be made first from prefixes that are more than 25 percent in use. A telephone corporation may assign numbers from prefixes with less than 25 percent use only to the extent necessary, if numbers from prefixes that are more than 25 percent in use are not otherwise available.

(Added by Stats. 1999, Ch. 809, Sec. 6. Effective October 10, 1999.)

7939. (a) If the commission or an authorized federal agency establishes a process to ensure that telephone numbers can be allocated in blocks smaller than 10,000, the commission shall require that a telephone corporation return to the North American Numbering Plan Administrator blocks of telephone numbers for reassignment, in a quantity determined by the commission.

(b) The commission shall direct the North American Numbering Plan Administrator to seek the return of blocks of numbers smaller than 10,000 not in use. The commission, for purposes of this section, shall define "not in use."

(Added by Stats. 1999, Ch. 809, Sec. 7. Effective October 10, 1999.)

7940. A telephone corporation doing business in this state that possesses one or more telephone number prefixes, or portions thereof, shall provide to the commission or its agent, upon request, use information pertaining to both those prefixes in use and those prefixes not in use, according to any schedule established by the commission.

(Added by Stats. 1999, Ch. 809, Sec. 8. Effective October 10, 1999.)

7943. (a) It is the intent of the Legislature that when the commission has no reasonable alternative other than to create a new area code, that the commission do so in a way that creates the least inconvenience for customers.

(b) The commission shall request that the Federal Communications Commission grant authority for the commission to order telephone corporations to assign telephone numbers dedicated to mobile telephony service and mobile data service, as defined in Section 224.4, to a separate area code and to permit seven digit dialing within that technology-specific area code and the underlying preexisting area code or codes.

(c) Before approving any new area code, the commission shall first perform a telephone utilization study and implement all reasonable telephone number conservation measures.

(d) If the commission receives the grant of authority set forth in subdivision (b) and determines that further area code relief is needed, the commission shall exercise the authority granted to it in subdivision (b) unless it finds at least one of the following:

(1) Exercising the authority granted by subdivision (b) would be more disruptive to the customers where area code relief has been determined to be necessary.

(2) Exercising the authority granted by subdivision (b) will not adequately extend the life of the area code where relief has been determined to be necessary.

(e) The commission may not implement any authority granted by the Federal Communications Commission pursuant to subdivision (b), in a manner that impairs the ability of a customer to have number portability.

(Amended by Stats. 2006, Ch. 198, Sec. 25. Effective January 1, 2007.)

Relief Planning Meeting Aid
Customer Education and Technical Milestones

This meeting aid is a compilation of industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

Customer Milestones:

			Responsibility
		1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding additional overlay	
		5 Update websites with information regarding additional overlay	
		6 Develop language for use in Directories to alert the consumers of 10-digit dialing and the new area code.	
		After Permissive 7 and 10-Digit Dialing Begins	
		7 Issue second customer notification(e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	
		9 Update social media with information regarding additional overlay	
		10 Update websites with information regarding additional overlay	
		11 Issue second (Mandatory) press release	

Relief Planning Meeting Aid
Customer Education and Technical Milestones

Technical Milestones:

			Responsibility
		1 Obtain industry test code from NANPA and activate the test number.	
		2 Open the test code in carriers' network.	
		3 LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	
		4 Ensure Highway boxes are programmed with 10-digit dialing.	
		5 Network ready for Permissive Dialing	
		6 Create Permissive Dialing Industry Contact List	
		Permissive Dialing Begins	
		7 Establish NPA Specific type of Trunks	
		8 Completion of 10-digit signaling transition between carriers' networks	
		9 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	
		10 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
		11 Recorded announcements in Place and Tested	
		<u>E911 Work Plan</u>	
		12 Confirm new ESN/NPD has been established for the new NPA	
		13 Ensure SRDB table has new NPA built in	
		14 Notify PSAPs, PSALI customers and County Coordinators (1 st and 2 nd Notification)	
		15 Review and Submit CLEC Trunk Order Requests to local provider if	

Relief Planning Meeting Aid
Customer Education and Technical Milestones

		needed	
		16 Update PSAP equipment	
		17 Trunk Orders Complete	
		18 Build E911 Network/Tandem Translations	
		19 Verify if all PSAP work has been completed	
		20 Activate E911 Network/Tandem Translations	

209 NPA Background Information

Relief Planning Background and Assumptions:

The 209 NPA was introduced in 1958 when it was split from the 415 NPA, which is one of the original three NPAs in California. In 1997, the 209 needed area code relief and the California Public Utilities Commission (CPUC) in Decision 97-06-051 approved a geographic split creating the 559 NPA (see PL-098). In 1999, the lottery was instituted for the 209 NPA and relief planning starting again. However, with the lottery in place and the introduction of thousand-block number pooling, the forecasted exhaust was pushed out considerably. In June 2011, jeopardy was rescinded. The 209 NPA has 62 rate centers of which 25 are in mandatory, 3 are mandatory-single service providers, 28 are optional, and 6 are excluded from Thousand-Block-Number Pooling, which started April 5, 2002.

The 209 NPA serves portions of Alameda, Alpine, Amador, Calaveras, El Dorado, Escalon, Fresno, Madera, Mariposa, Merced, Sacramento, San Joaquin, Stanislaus, and Tuolumne counties. The 209 serves the cities of Angels Camp, Atwater, Ceres, Dos Palos, Galt, Gustine, Hughson, Ione, Lathrop, Livingston, Lodi, Los Banos, Manteca, Merced, Modesto, Newman, Oakdale, Patterson, Plymouth, Ripon, Riverbank, Sonora, Stockton, Tracy, Turlock, and Waterford. The 209 NPA also covers Yosemite National Park and Kirkwood Mountain Resort. The 209 NPA is bordered on the north by the 916/279 NPA, on the north and northeast by the 530 NPA, on the southeast by the 760/442 NPA overlay complex, to the south the 559 NPA and 831 NPA, to the west by the 925 NPA and the 408/669 NPA overlay complex.

CO Code Summary:

As of December 28, 2020, the 209 NPA has 740 codes assigned, 43 codes available for assignment and 17 Un-Assignable codes: N11s, 209, 350, 555, 700, 766, 950, 958, 959 and 976. There are 54 total service providers. Additionally, there are 19 NXX codes that are grandfathered from the 209-559 NPA split in the 559 NPA Fresno rate center.

Exhaust Forecast:

A delta NRUF (Numbering Resource Utilization/Forecast), published by NANPA on December 15, 2020, indicates the 209 NPA will exhaust during the fourth quarter of 2022. Relief planning for an additional NPA is to start immediately. Jeopardy was declared by NANPA on December 16, 2020.

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 209 NPA

DELTA NRUF DATE.....	December 15, 2020
PROJECTED EXHAUST DATE.....	4Q2022
ANNUALIZED CODE DEMAND PROJECTION.....	23
MONTHLY CO CODE DEMAND PROJECTION.....	1.95
NXX Assignment Data	December 2020
Relief Recommendation.....	All-Services Distributed Overlay

CURRENT DIALING PLAN:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	1+10 digits (1+NPA-NXX-XXXX)
Toll Call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (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)

California - 209 NPA
NXX Summary Data as of 12/28/20

<u>NPA</u>	<u>209</u>					
Assigned NXXs	740					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	17	See Note				
Available NXXs	43					
Total	800					
<u>Codes Assigned NPA 209</u>	<u>Jan-16</u>	<u>Feb-16</u>	<u>Mar-16</u>	<u>Apr-16</u>	<u>May-16</u>	<u>Jun-16</u>
	0	0	1	1	4	5
	<u>Jul-16</u>	<u>Aug-16</u>	<u>Sep-16</u>	<u>Oct-16</u>	<u>Nov-16</u>	<u>Dec-16</u>
	2	3	1	0	4	2
	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	<u>Apr-17</u>	<u>May-17</u>	<u>Jun-17</u>
	0	2	3	1	0	1
	<u>Jul-17</u>	<u>Aug-17</u>	<u>Sep-17</u>	<u>Oct-17</u>	<u>Nov-17</u>	<u>Dec-17</u>
	0	1	0	0	1	0
	<u>Jan-18</u>	<u>Feb-18</u>	<u>Mar-18</u>	<u>Apr-18</u>	<u>May-18</u>	<u>Jun-18</u>
	2	0	2	1	0	1
	<u>Jul-18</u>	<u>Aug-18</u>	<u>Sep-18</u>	<u>Oct-18</u>	<u>Nov-18</u>	<u>Dec-18</u>
	0	1	2	1	1	0
	<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>
	0	1	1	0	1	0
	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>
	2	1	0	4	1	2
	<u>Jan-20</u>	<u>Feb-20</u>	<u>Mar-20</u>	<u>Apr-20</u>	<u>May-20</u>	<u>Jun-20</u>
	0	2	2	3	2	2
	<u>Jul-20</u>	<u>Aug-20</u>	<u>Sep-20</u>	<u>Oct-20</u>	<u>Nov-20</u>	<u>Dec-20</u>
	4	6	14	4	2	3*
Delta NRUF published on 12/15/2020 shows a projected exhaust date of 4Q2022						
*As of December 28, 2020						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

POOLING STATISTICS	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	CA 209
MEETING DATE:	03/04/21
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	4/5/02
RATE CENTERS	
<i># Total</i>	62
<i># Mandatory</i>	25
<i># Mandatory-Single Service Providers (M*)</i>	3
<i># Optional</i>	28
<i># Excluded</i>	6
BLOCKS ASSIGNED	
<i># Total</i>	529
<i>(For time period 1/01/20 - 12/28/20)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	237
<i>(As of preparation date: 12/28/20)</i>	
CODES ASSIGNED	
<i># Total</i>	44
<i># for Pool Replenishment</i>	40
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	4
<i>(For time period 1/01/20 - 12/28/20)</i>	
CODES FORECASTED	
<i># Total</i>	30
<i># for Pool Replenishment and Dedicated Customers</i>	27
<i># for LRNs</i>	3
<i>(For the next twelve months as of: 12/28/20)</i>	

California 209 NPA Code Holder List

Company	OCN	CountOfNXX
33 WIRELESS INC.	6967	1
AMERICAN MESSAGING SERVICES, LLC	6906	6
AMERICAN MESSAGING SERVICES, LLC	9748	12
ARRIVAL COMMUNICATIONS, INC. - CA	4553	4
AT&T CORP.	516C	6
AT&T LOCAL	7421	2
BANDWIDTH.COM CLEC, LLC - CA	981E	27
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
BROOKS FIBER COMMUNICATIONS OF CALIFORNIA - CA	7128	7
CALAVERAS TELEPHONE CO.	2301	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - CA	6006	63
CENTURYLINK COMMUNICATIONS LLC	7575	4
CHARTER FIBERLINK CA-CCO, LLC - CA	776C	2
CITIZENS TELECOM DBA FRONTIER COMM OF TOULUMNE	2342	1
COMCAST PHONE OF CALIFORNIA, LLC - CA	7610	15
COMMIO, LLC	939H	1
CSC WIRELESS, LLC	425J	1
EXIANT COMMUNICATIONS LLC	114J	1
FRACTEL, LLC	965H	2
FRONTIER CALIFORNIA INC.	4420	13
GLOBAL VALLEY NETWORKS	2315	5
HD CARRIER LLC	321J	1
HORNITOS TELEPHONE CO.	2322	4
LEVEL 3 COMMUNICATIONS, LLC - CA	8826	20
LEVEL 3 TELECOM OF CALIFORNIA, LP - CA	7718	1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229	1
METRO PCS, INC.	5562	10
MPOWER COMMUNICATIONS CORP - CA	8322	1
MPOWER NETWORKS SERVICES INC. - CA	748D	1
NEW CINGULAR WIRELESS PCS, LLC	6010	103
O1 COMMUNICATIONS, INC. - CA	4129	43
ONVOY SPECTRUM, LLC	624H	2
ONVOY, LLC - CA	649C	42
PACIFIC BELL	9740	180
PEERLESS NETWORK OF CALIFORNIA, LLC - CA	373F	7
RCLEC, INC. - CA	886G	1
SIERRA TELEPHONE CO., INC.	2338	2
SPRINT SPECTRUM L.P.	6664	29
TELEPORT COMMUNICATIONS GROUP - SAN FRANCISCO	7145	6
TELNYX LLC	073H	2
TERRA NOVA TELECOM INC.	145J	1
T-MOBILE USA, INC.	6529	42
U.S. TELEPACIFIC CORP. - CA	7453	8
USA MOBILITY WIRELESS, INC.	6630	1

California 209 NPA Code Holder List

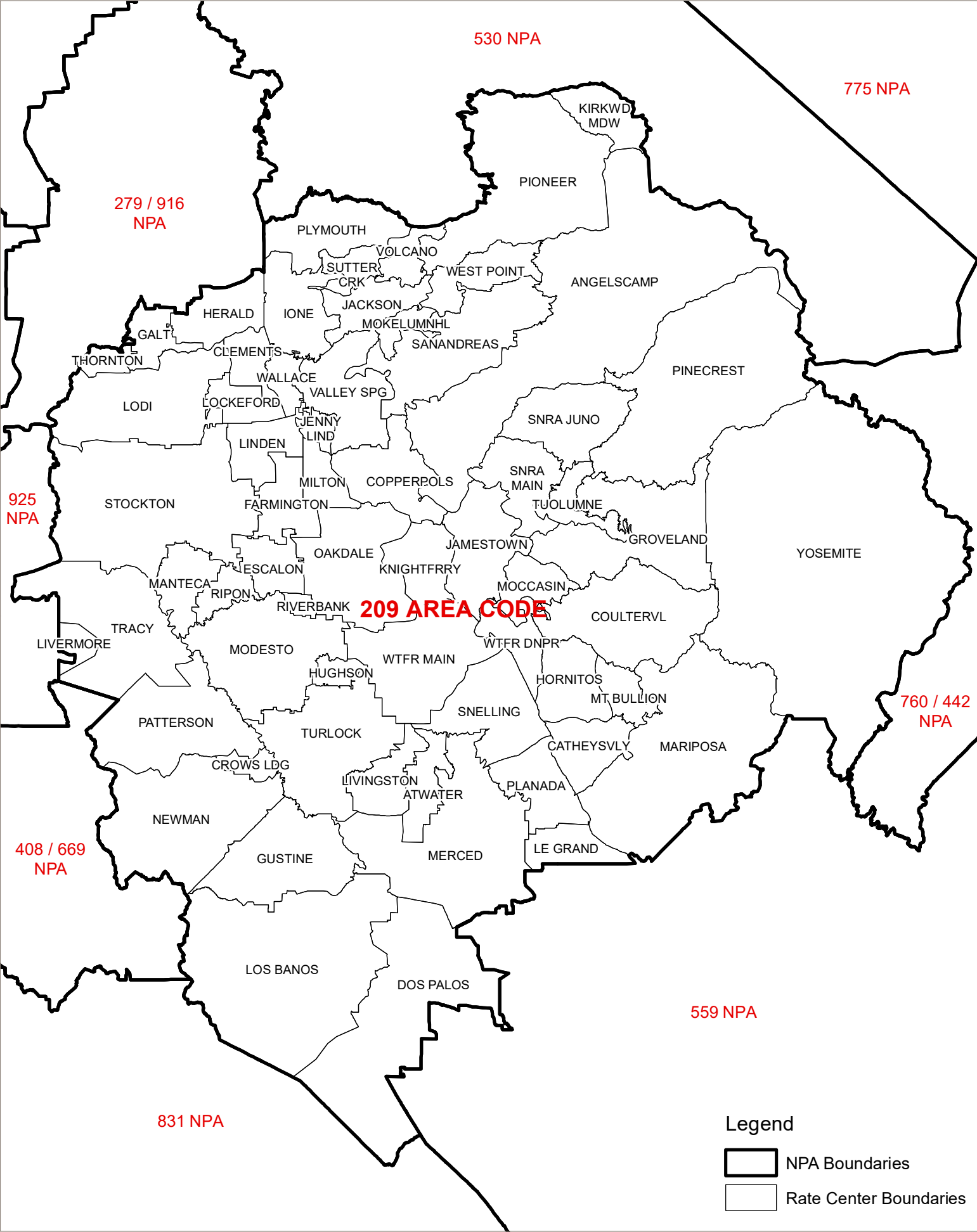
UTILITY TELECOM GROUP, LLC - CA	9262	10
VAYA TELECOM, INC. - CA	432F	2
VODEX COMMUNICATIONS CORPORATION - CA	320H	7
VOLCANO TELEPHONE CO.	2343	4
VONAGE NETWORK INC.	197D	1
WEST TELECOM SERVICES, LLC	683G	3
WEST TELECOM SERVICES, LLC - CA	808C	1
WIDE VOICE, LLC - CA	252F	2
XO CALIFORNIA, INC.	7262	3
YMAX COMMUNICATIONS CORP. - CA	258E	2

209 NPA Rate Center Table

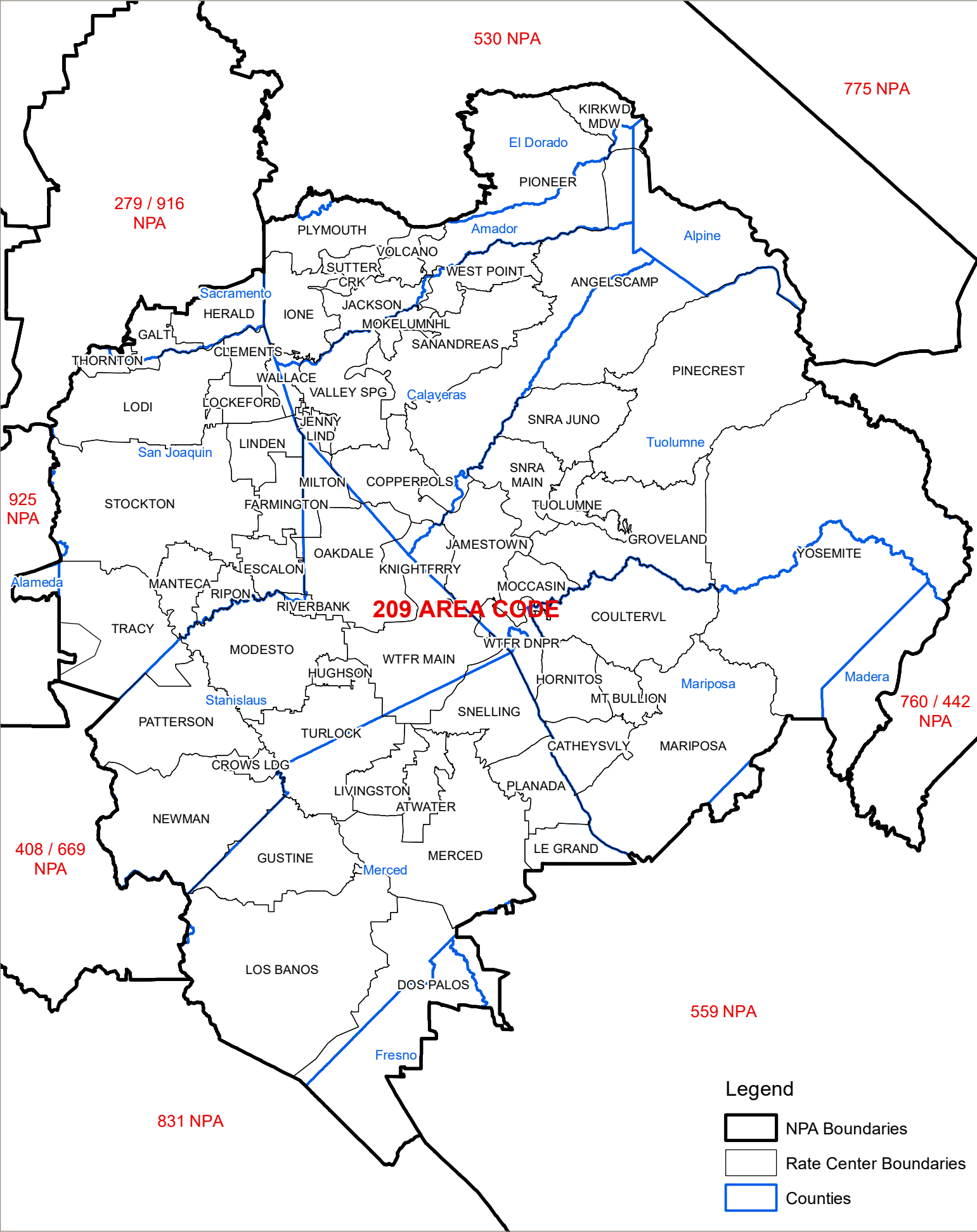
NPA	Rate Center
209	ANGELS CAMP
209	ATWATER
209	CATHEYS VALLEY
209	CLEMENTS
209	COPPEROPOLIS
209	COULTERVILLE
209	CROWS LANDING
209	DOS PALOS
209	ESCALON
209	FARMINGTON
209	GALT
209	GROVELAND
209	GUSTINE
209	HERALD
209	HORNITOS
209	HUGHSON
209	IONE
209	JACKSON
209	JAMESTOWN
209	JENNY LIND
209	KIRKWOOD MEADOWS
209	KNIGHTS FERRY
209	LE GRAND
209	LINDEN
209	LIVINGSTON
209	LOCKEFORD
209	LODI
209	LOS BANOS
209	MANTECA
209	MARIPOSA
209	MERCED
209	MILTON
209	MOCCASIN
209	MODESTO
209	MOKELUMNE HILL
209	MOUNT BULLION
209	NEWMAN
209	OAKDALE
209	PATTERSON
209	PINECREST (TUOLUMNE)

209 NPA Rate Center Table

209	PIONEER
209	PLANADA
209	PLYMOUTH
209	RIPON
209	RIVERBANK
209	SAN ANDREAS
209	SNELLING
209	SONORA: JUNO DA
209	SONORA: MAIN DA
209	STOCKTON
209	SUTTER CREEK
209	THORNTON
209	TRACY
209	TUOLUMNE
209	TURLOCK
209	VALLEY SPRINGS
209	VOLCANO
209	WALLACE
209	WEST POINT
209	WATERFORD: DON PEDRO DA
209	WATERFORD: MAIN DA
209	YOSEMITE







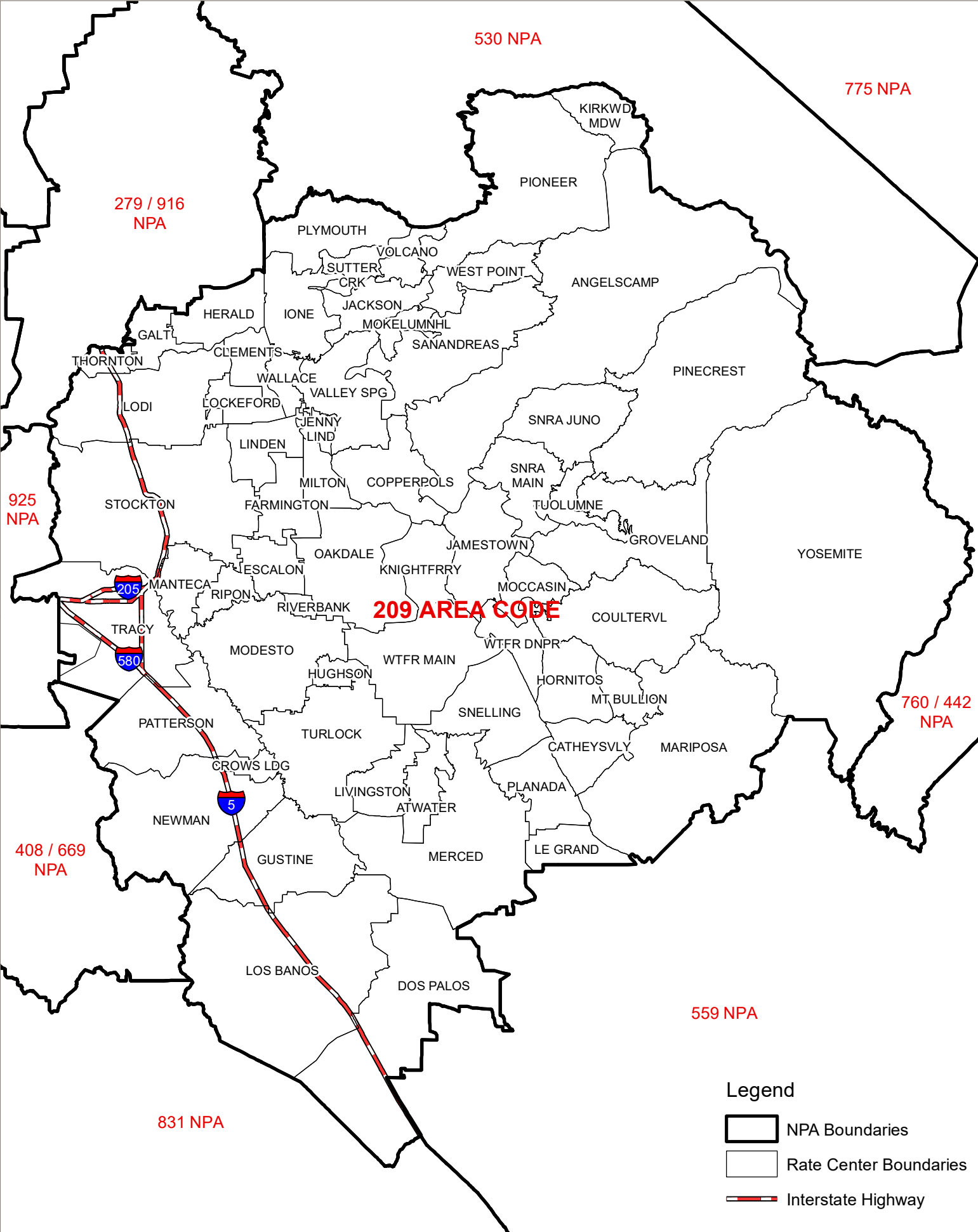


EXHIBIT B



March 31, 2021

To: All 209 NPA Code Holders and Interested Industry Members (California)

Subject: Final Minutes of Draft Petition Review Meeting

Attached are the final minutes from the March 4, 2021 draft petition review meeting for the California 209 NPA. These minutes became final on March 26, 2021, and include edits that were provided to the draft minutes. The application for relief of the 209 NPA will be filed with the California Public Utilities Commission no later than April 15, 2021.

If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@somos.com.

Sincerely,

Heidi A. Wayman
Manager, Data Management
NANPA

cc: Joanne Leung – CPUC Staff
Eric Van Wambeke – CPUC Staff

**CALIFORNIA – 209 NPA
DRAFT PETITION REVIEW MEETING
VIA CONFERENCE CALL
FINAL MINUTES
March 4, 2021**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, Manager, Data Management–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Heidi then reviewed the agenda and NANPA’s role and responsibilities.

NANPA’s ROLE AND RESPONSIBILITIES

Heidi reviewed NANPA’s role and responsibilities for today’s meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the Numbering Plan Area (NPA). In this case, the October 2020 projected exhaust for the 209 NPA was fourth quarter of 2023 (4Q2023). After reviewing and revisiting the projected exhaust in December 2020, a revised NPA exhaust projection was published by NANPA on December 15, 2020, moving the exhaust date in by four quarters to fourth quarter of 2022 (4Q2022) due to increased CO code demand. As a result, the planning process for relief of the 209 NPA began immediately.
- Distribute the notice with the draft petition at least two months prior to the initial relief planning meeting which was completed on December 30 2020.
- Then, the main objective is achieved by reaching consensus on the application for relief to be filed with the California Public Utilities Commission (CPUC).
- Also determine any additional items to include in a filing with the CPUC such as dialing plan and implementation intervals, and comply with any state specific requirements.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today’s meeting per the INC guidelines or as decided by the industry or as required by the state statute.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Heidi stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

An overlay is the only option for relief of the 209 NPA, per Section 5.6.2 of the Industry Numbering Committee’s NPA Code Relief Planning and Notifications Guidelines (ATIS-0300061; “the Guidelines) which state:

Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, or the NPA is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

Background information on the 988 project was presented from Planning Letter 556 ([PL-556](#)) which is available on the NANPA website. The aforementioned Guideline was updated in response to the adoption of FCC Order 20-100 approving the designation of 988 as the 3-digit abbreviated dialing code for the National Suicide Prevention Lifeline. PL-556 states:

On July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022.¹ The Order requires covered providers to implement mandatory 10-digit dialing in NPAs that use both 7-digit dialing and 988 as an NXX.

The 209 NPA is one of the NPAs transitioning to 1+10-digit dialing to ensure users can dial 988 and reach the National Suicide Prevention Lifeline.

Heidi also reviewed the implementation schedule to transition to 10-digit dialing as outlined in PL-556. It is noted in PL-556 that California uses 1+10-digit for local dialing.

ACTION	TIME	DATE
Start of permissive 10-digit dialing (“permissive 10-digit dialing effective date”)	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the “permissive dialing date” and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation)
End of permissive dialing and start of mandatory 10-digit dialing (“mandatory	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the

10-digit dialing effective date”)		“mandatory dialing date” and starts the 8.5-month period where carriers can start enforcing mandatory 10- digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing)

Heidi referred the participants to the relief planning meeting aids included in the relief plan: Excerpts from the INC NPA Code Relief Planning Guidelines, and the Customer and Technical Milestones. These meeting aids will assist the participants in their decision making and the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

NPA STATUS

Exhaust Forecast: The October 2020 Number Resource Utilization Forecast (“NRUF”) projects the 209 NPA to exhaust during the 4Q2023. A delta NRUF was published on December 15, 2020 revising the forecast by four quarters to 4Q2022.

On December 16, 2020, NANPA declared a jeopardy situation for the 209 NPA in California. According to Section 15.3 of the Thousands Blocks (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG), “*An NPA jeopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.*” The interim jeopardy procedures were placed into effect. The interim jeopardy procedures require Central Office (CO) Code allocations to be set at three per month and that the Pooling CO code applications are entered in the lottery along with non-pooled CO Code applications. The interim procedures are to remain in place until final jeopardy procedures are established.

On December 29, 2020, NANPA convened the industry to finalize the jeopardy procedures which became effective immediately. Twenty (20) CO codes were set aside for pooling and there are two (2) CO codes rationed in the lottery every month. The industry also put a trigger in place for the 209 NPA.

TRIGGER: NANPA will reconvene the industry to revisit the jeopardy procedures when the remaining pooling set-asides reaches 7 or the total number of CO codes available for

assignment reaches 30.

As of March 3, 2021, the 209 NPA has 744 codes assigned, 39 codes available for assignment, 17 codes set aside for the pooling administrator and 17 Un-Assignable codes: N11s, 209, 350, 555, 700, 766, 950, 958, 959 and 976. There are 54 total service providers. Additionally, there are 19 CO codes that are grandfathered from the 209-559 NPA split in the 559 NPA Fresno rate center.

NUMBER POOLING INFORMATION

Cecilia McCabe, NANPA – NPA Relief Planner, reported that in the 209 NPA pooling commenced on April 5, 2002, there are 62 rate centers (RCs); 25 RCs are mandatory, 3 are mandatory-single service providers, 28 are optional and 6 are excluded. In the period of March 1, 2020 to March 3, 2021, 533 blocks have been assigned in the 209 NPA, and as of March 3, 2021 there are 232 blocks available for assignment to service providers. Pooling has assigned 46 codes in the same period, 43 for pool replenishment, 0 for dedicated customers and 3 for LRNs. The forecasted need for the next twelve months is 12 codes for pool replenishment and dedicated customers and 1 for LRN.

REVIEW RELIEF PLAN FOR THE 209 NPA

Heidi reviewed the relief plan meeting notice.

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS:

The 209 NPA was introduced in 1958 when it was split from the 415 NPA, which is one of the original three NPAs in California. In 1997, the 209 needed area code relief and the California Public Utilities Commission (CPUC) in Decision 97-06-051 approved a geographic split creating the 559 NPA (see PL-098). In 1999, the lottery was instituted for the 209 NPA and relief planning starting again. However, with the lottery in place and the introduction of thousand-block number pooling, the forecasted exhaust was pushed out considerably. In June 2011, jeopardy was rescinded. The 209 NPA has 62 rate centers of which 25 are in mandatory, 3 are mandatory-single service providers, 28 are optional, and 6 are excluded from Thousand-Block-Number Pooling, which started April 5, 2002.

The 209 NPA serves portions of Alameda, Alpine, Amador, Calaveras, El Dorado, Escalon, Fresno, Madera, Mariposa, Merced, Sacramento, San Joaquin, Stanislaus, and Tuolumne counties. The 209 serves the cities of Angels Camp, Atwater, Ceres, Dos Palos, Galt, Gustine, Hughson, Ione, Lathrop, Livingston, Lodi, Los Banos, Manteca, Merced, Modesto, Newman, Oakdale, Patterson, Plymouth, Ripon, Riverbank, Sonora, Stockton, Tracy, Turlock, and Waterford. The 209 NPA also covers Yosemite National Park and Kirkwood Mountain Resort. The 209 NPA is bordered on the north by the 916/279 NPA, on the north and northeast by the 530 NPA, on the southeast by the 760/442 NPA overlay complex, to the south the 559 NPA and 831 NPA, to the west by the 925 NPA and the 408/669 NPA overlay complex.

Heidi also reviewed:

NPA 209 Rate Center Map of the 62 rate centers

NPA 209 map of Rate Centers and Cities

NPA 209 Rate Center, and Counties
NPA 209 Rate Center and Highway Map
Rate Center Table
Code Holder Table

REVIEW DRAFT RELIEF PETITION FOR THE 209 NPA

Heidi reviewed the draft application for relief for the 209 NPA which recommends an all-services distributed overlay. A new NPA would be assigned to the same geographic area occupied by the existing 209 NPA. Customers would retain their current telephone numbers. The projected life of the new area code is approximately 31 years based on current assignment rates. Consensus was reached to approve NANPA's recommended petition as edited by the participants.

Consensus was reached on the following dialing plan which remains consistent with the dialing plan for overlays in California:

Overlay Dialing Plan

Type of call	Call terminating to	Dialing plan
Local	Home NPA (HNPA) or Foreign NPA (FNPA)	1+10-digits (NPA-NXX-XXXX)
Toll	HNPA or FNPA	1 + 10-digits (1 + NPA-NXX-XXXX)
Operator Utilities Credit card, collect, third party	HNPA or FNPA	0 + 10-digits (0 + NPA-NXX-XXXX)

ESTABLISH IMPLEMENTATION SCHEDULE

An explanation was provided as to why implementation dates were provided and a suggested 9-month implementation schedule versus the standard 13-month implementation schedule in the petition. The 209 NPA is currently in jeopardy and is moving to 1+10-digit dialing as a result of the implementation of 988; if the CPUC can provide a decision by November 1, 2021, then the industry can start customer education and network preparation on January 1, 2022, which would occur after the 988 customer education has been completed. This implementation timeframe would allow area code relief of the 209 NPA to be in place as early as possible in the 4th Quarter 2022.

Consensus was reached to recommend that CO codes will not be assigned in the new NPA until all available codes in the 209 NPA have been exhausted. A recommendation was made and consensus was reached to recommend to the CPUC a 9-month schedule for implementation of the overlay with the new NPA becoming effective early in the same quarter as forecasted exhaust. Since mandatory 1+10-digit dialing will already be in place, there is no permissive dialing period. The recommended schedule is as follows:

Recommended Implementation Dates for Overlay:

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	January 1, 2022
Customer Education and Network Preparation Period Ends	October 1, 2022
Effective date of the new NPA (and earliest possible CO code activation)*	October 1, 2022
Earliest Date CO codes in the new NPA may be requested from NANPA	July 27, 2022

*CO codes in the new NPA will not be assigned until all available codes in the 209 NPA have been exhausted.

CUSTOMER EDUCATION PLAN

A permissive dialing period is not needed in the recommended implementation dates. Multiple customer education notices are being sent out about the transition to mandatory 10-digit dialing due to the implementation of the 988 3-digit code, and such education will be completed in September 2021. The group reached consensus to recommend suggested modifications to the Public Education Plan (PEP) from the 909 overlay, outlining which activities are not needed and why, which will be filed with the CPUC as the recommended PEP for the 209 overlay. (See Attachment #4)

There was discussion regarding including additional items in the minutes and consensus was reached to include the following customer and technical milestones for implementation of an overlay when mandatory 10-digit dialing customer education has already been completed.

Customer Milestones:

	Responsibility
1 First customer notification of new NPA through methods such as bill messages, bill inserts, direct mail, text messaging, email	All carriers
2 Issue initial press release	CPUC
3 Send Special letters to PSAPs and Directory Publishers	Volunteer industry committee co-chairs
4 Update social media with information regarding the overlay	All carriers (optional)
5 Update websites with information regarding the overlay	All carriers

6	Issue second press release	CPUC and all carriers (optional)
7	Second customer notification of new NPA through methods such as bill messages, bill inserts, direct mail, text messaging, email	All carriers

Technical Milestones:

	Responsibility
1 Obtain new NPA industry test code from NANPA and activate the test number.	1 carrier volunteer
2 Open the test code in carriers' network.	All carriers
3 Establish new NPA Specific type of Trunks	All carriers (if needed)
<u>E911 Work Plan</u>	
4 Confirm new ESN/NPD has been established for the new NPA	911 Providers
5 Ensure SRDB table has new NPA built in	911 Providers
6 Notify PSAPs, PSALI customers and County Coordinators of new NPA	911 Providers
7 Review and Submit CLEC Trunk Order Requests to local provider if needed	All carriers
8 Update PSAP equipment	PSAPs
9 Trunk Orders Complete	911 Providers
10 Build E911 Network/Tandem Translations	911 Providers
11 Verify if all PSAP work has been completed	PSAPs
12 Activate E911 Network/Tandem Translations	911 Providers

The above are the typical milestones necessary for implementation of an initial overlay when mandatory 1+10-digit dialing is already in place; however, these may need to be modified during the actual implementation.

STATE STATUTE REQUIREMENTS:

Heidi mentioned the PU Code (section 7931) has the state statutes of certain notification requirements: NANPA is to formally notify the CPUC at least **30 months prior** to the projected opening of a new NPA;

-Within three-months of that notice, all Service Providers are to notify all customers in writing of the need to establish a new area code and;

-Within 9 months of that notice to the CPUC the staff and the area code relief coordinator (NANPA) are to notify representatives of local jurisdictions and the public in affected geographic areas, and, at the discretion of the commission, may conduct one or more meetings both for representatives of local jurisdictions and members of the public to inform them of the proposed area code relief;

-Then within 11 months of that notice NANPA will file the results of the area code relief planning process with the CPUC requesting approval to implement a plan.

Heidi sent a formal notification to the CPUC on March 3, 2021 notifying the CPUC of the need for an area code overlay for relief of the 209 NPA and posted the letter on NNS. In lieu of public meetings, the CPUC staff and NANPA will be putting together a webcast which will be posted to the CPUC website on June 1, 2021. The industry members must inform their customers of the need for the new area code and webcast. The customer notice verbiage has been approved by the CPUC and will be sent out via NNS today as well as emailed to all service provider OCNs in the 209 NPA. Due to the critical timing for a new area code in the 209 NPA, these notices must be distributed prior to June 1.

STATEMENT FOR THE RECORD

The following statement for the record was provided during the meeting:

The Industry respectfully requests that the CPUC approve the industry's application to implement an overlay for relief of the 209 area code, including the proposed implementation dates and proposed Public Education Program (PEP), no later than November 1, 2021. The Industry will work together to ensure the overlay implementation is successful. The 209 overlay differs from past overlays in California:

- The 209 area code is in jeopardy. A more expedient than typical decision is needed to ensure customers are able to obtain service from their service provider of choice.***
- Mandatory 1+10-digit dialing education is already underway in the 209 area code due to the federal 988 implementation requirement, and will be completed by the time the overlay area code is implemented. No paid advertising will be used.***
- The Industry's proposed schedule and dates allow the Industry to implement relief efficiently, avoid holiday network freeze timeframes, and reduce the risk of running out of numbers before relief is implemented.***
- Educating 209 customers about the new overlay area code is just an informational exercise. Californians are already very familiar with multiple area codes, with 35 area codes already in service in California, including 12 overlays.***

- ***The Industry is experienced in educating customers about the introduction of new overlay area codes when mandatory 10-digit or 1+10-digit dialing is already in place. The industry has successfully implemented a number of additional overlays to existing overlays in Georgia, New York, and Texas. No paid advertising was used.***
- ***Paid advertising requirements in PEPs create the need for a funding mechanism, and past PEPs demonstrate that the funding mechanism is a burdensome, inefficient and unnecessarily complex process shouldered unfairly by a few industry volunteers.***
- ***For the 209 overlay with its simple informational messaging, paid advertising and a funded PEP doesn't make fiscal sense. It would be virtually impossible to implement a funded PEP within the recommended 9-month implementation schedule.***

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will file the application for relief with the CPUC informing them of the outcome of this relief planning meeting. The INC guidelines reflect the application is to be filed with the regulator within 6 weeks (April 15, 2021) of the initial relief planning meeting unless otherwise decided by the industry.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry no later than March 18, 2021. Any changes or corrections are to be submitted to Heidi via hwayman@somos.com by March 26, 2021 when the minutes will become final.

Adjourned

#

These minutes became final on March 26, 2021 with edits.

**California 209 NPA
Initial Relief Planning Meeting via Conference Call
March 4, 2021
Participants**

NAME	COMPANY
Sharon Poer	AT&T
Joanne Leung	CPUC
Rita Schmitz	CenturyLink/Lumen
Rosemary Coates	Frontier
Judy Geise	Frontier
Paul Belote	Inteliquent
Heidi Wayman	NANPA
Cecilia McCabe	NANPA
Florence Weber	NANPA
Linda Hymans	NANPA
Kristy Kem	Sierra Telephone
Lorena Norman	Sierra Telephone
Yvonne Wooster	Sierra Telephone
Kyevea Babbitt	T-Mobile
Esperanza Creighton	T-Mobile
Shaunna Forshee	T-Mobile
Karen Riepenkroger	T-Mobile
Jim Sohn	Utility Telecom Group
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless
Kelly Faul	XO Communications

POOLING STATISTICS	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	CA 209
MEETING DATE:	3/4/21
POOL START DATE (PSD)	4/5/02
RATE CENTERS	
<i># Total</i>	62
<i># Mandatory</i>	25
<i># Mandatory-Single Service Providers (M*)</i>	3
<i># Optional</i>	28
<i># Excluded</i>	6
BLOCKS ASSIGNED	
<i># Total</i>	533
<i>(For time period 3/01/20 - 3/3/21)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	232
<i>(As of preparation date: 3/3/21)</i>	
CODES ASSIGNED	
<i># Total</i>	46
<i># for Pool Replenishment</i>	43
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	3
<i>(For time period 3/01/20 - 3/3/21)</i>	
CODES FORECASTED	
<i># Total</i>	13
<i># for Pool Replenishment and Dedicated Customers</i>	12
<i># for LRNs</i>	1
<i>(For the next twelve months as of: 3/3/21)</i>	

ATTACHMENT A – Public Education Plan for 909-209 Area Code Relief(As amended per CPUC staff approval granted during implementation* CPUC staff may grant amendments as needed during implementation)

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
1	Effective date of decision approving <u>909-209</u> area code overlay	NA	NA		Date of Decision (DOD)	<u>No later than 11/01/2021</u>	<u>To allow an Implementation Start Date (ISD) of 01/01/2022</u>
2a	Task Force Finance Subcommittee to send emails to service providers requesting invoicing information and confirmation of 909 numbering resources in inventory as of DOD	Service providers holding blocks/codes in 909 as of DOD	Shared		3 weeks after Implementation Start Date (ISD)		<p><u>209 customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation (and without paid advertising); see Milestones #3, 4, 6, 7, 8, 9, 12, 13, 18, 19, 22, 23, 25 and 27 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to_10_digit_dialing_for_988/index.html.</u></p> <p><u>Educating 209 customers about the new area code is just informational after 10/24/21. No paid advertising is necessary to educate customers about the new area code, as carriers can use other no cost methods such as bill inserts or bill messages, press releases, and carrier website postings to do so. Thus a funded PEP and Activities #2a, 2b, 7, 12 and 15 here are not necessary.</u></p> <p><u>It would be virtually impossible to implement a funded PEP within the recommended 9-month implementation schedule.</u></p>
2b	Respond to Task Force Finance Subcommittee with billing information and confirmation of 909 numbering resources	Service providers holding blocks/codes in 909 as of DOD	Individual		2 weeks after ISD 5 weeks after ISD*		<u>See explanation above in Activity #2a</u>
3	NANPA <u>909-209</u> implementation meeting, and request for industry participation on PEP task force and subcommittees. Determination of ISD.	CPUC Staff and Industry	Shared		3 weeks after DOD	<u>No later than 12/15/2021</u>	<u>Implementation Start Date (ISD) = 01/01/2022</u>

Attachment #4

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
4	Overlay information distributed internally as job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual		1 month after ISD	<u>02/01/2022</u>	
5	<u>909-209</u> overlay update to industry websites	All customers	Individual		3 months after ISD	<u>04/01/2022</u>	
6	News release regarding the start of permissive dialing, announcing the 909-209 area code relief plan, and the 909-209 area code geographic boundaries, and the new overlay area code for issue within the <u>909-209</u> area code and adjacent area codes, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	All customers	Shared		5 months after ISD	<u>05/01/2022</u>	<u>No permissive dialing period is needed because customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation. See Milestones #8 and #23 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
7	Task Force Finance Subcommittee issue invoices for PEP fund payments to service providers holding blocks in 909 as of DOD.	Task Force Finance Subcommittee			4 months after ISD		<u>See explanation above in Activity #2a</u>
8	Customer Notification No. 1: Announce the new area code plan, including information about 1+10-digit dialing and indicate the affected areas, and the new area code effective key dates, and how customers should prepare for the overlay.	All customers	Individual		4-5 months after ISD <u>~5 months after ISD*</u>	<u>06/01/2022</u>	<u>Carriers shall run this first customer notice during their May 2022 billing cycles.</u>

Attachment #4

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
9	Provide by email targeted letters with the information in Customer Notification No. 1, along with PEP Task Force contact information, and an offer to provide industry speakers , to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports , and other key government agencies, (2) alarm service providers , (32) public safety organizations and PSAPs , (4) coin-operated pay telephone providers , (53) telephone directory publishers , and (64) California Relay Services throughout the 909-209 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/ activist organizations, chambers of commerce, city councils and other key government agencies, airports , alarm service providers , public safety organizations and PSAPs, coin-operated pay telephone providers , telephone directory publishers, and California Relay Services	Shared		4 months after ISD 3 months after ISD	<u>04/01/2022</u>	<u>No industry speakers have been requested in the last 4+ overlay implementations in California so the offer is unnecessary.</u> <u>Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to_10_digit_dialing_for_988/index.html.</u>
10	Begin Permissive Dialing			6 months after ISD on Saturday			<u>No permissive dialing period will be needed because 209 customers will have already been educated about mandatory 1+10-digit dialing by 09/24/2021 due to the 988 implementation. See Milestones #3, 4, 6, 7, 8, 9, 12, 13, 18, 19, 22, 23, 25 and 27 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to_10_digit_dialing_for_988/index.html.</u>
11	Published Directories: Add information on cover to alert customers in 909-209 area code <u>about the new overlay area code</u>	All customers	Individual		6 months after ISD	<u>07/01/2022</u>	
12	Remit full payment for PEP fund contribution	Service providers holding blocks/codes in 909 as of DOD			7 months after ISD		<u>See explanation above in Activity #2a</u>

Attachment #4

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
13	Correct payphone signage to include updated dialing instructions	All customers	Individual		10 months after ISD		<u>This will have already been completed by 9/9/2021 due to the 988 implementation. See Milestones #3, 7, 18 and 21 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
14	News release <u>reminding the public of regarding the start of 1+10-digit mandatory dialing, the 909-209 area code relief plan, and the 909-209 area code geographic boundaries, and the new overlay area code</u> for issue within the 909-209 area code, adjacent area codes, and statewide, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	Statewide	Shared		11 months after ISD 11.5 months after ISD* ~8.5 months after ISD	~09/15/2022	<u>Mandatory 1+10-digit dialing will have already been implemented by 07/15/2022 due to the 988 implementation. See Milestones #33 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u> <u>This news release is just a reminder that the new overlay area code becomes effective on 10/01/2022.</u>
15	Disseminate information in relevant zoned editions of major newspapers, ethnic media, radio and television through paid advertising. (Note: The bulk of the information should be disseminated in the three weeks preceding the beginning of mandatory 1+10 digit dialing.)	All customers	Shared	6 months after ISD	12 months after ISD		<u>Paid advertising is not necessary to educate customers about the new overlay area code when mandatory 1+10-digit dialing will have already been implemented by 07/15/2022.</u> <u>Paid advertising would be virtually impossible to accomplish in the 9-month implementation schedule; The 9-month schedule provides the CPUC with as much time as possible to issue the Order and still allow the industry to get relief implemented before the holiday network freezes and 209 area code exhaust. Other no cost methods shall be used to educate customers about the new overlay area code becoming effective on 10/01/2022.</u>
16	Offer industry appearances on local radio or TV talk shows	All customers	Shared	10 months after ISD	12 months after ISD		<u>No industry appearances have been requested or made in the last 4+ overlay implementations in California so the offer is unnecessary.</u>

Attachment #4

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	Recommended Due Date	Status/NotesExplanation or Rationale
17	Customer Notification No. 2: Announce <u>Reminder of</u> the new area code plan, <u>including information about mandatory 1 + 10 digit dialing</u> and <u>indicate the affected areas, and the new area code key-effective dates, and how customers should prepare for the overlay.</u>	All customers	Individual		10 months after ISD <u>~10 months after ISD*</u> <u>9 months after ISD</u>	<u>10/01/2022</u>	<u>Carriers will run this reminder customer notice during their September 2022 billing cycles.</u>
18	Provide by email targeted letters with the information in <u>reminder</u> Customer Notification No. 2, along with PEP Task Force contact information, and an offer to provide industry speakers, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm-service providers, (32) public safety organizations and PSAPs, (4) coin-operated pay telephone providers, (53) telephone directory publishers, and (64) California Relay Services throughout the <u>909-209</u> area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, airports, alarm-service providers, public safety organizations and PSAPs, coin-operated pay telephone providers, telephone directory publishers, and California Relay Services	Shared		10 months after ISD <u>9 months after ISD</u>	<u>10/01/2022</u>	<u>No industry speakers have been requested in the last 4+ overlay implementations in California so the offer is unnecessary.</u> <u>Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
19	Complete implementation of recorded message announcing mandatory dialing	All customers	Individual		10 months after ISD		<u>This Activity will have already been completed between 9/24/2021 and 6/15/2022 due to the 988 implementation. See Milestone #30 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>
20	Begin Mandatory Dialing			<u>1 month before 909 overlay effective date</u>			<u>This Activity will have already been completed between 10/24/2021 and 7/15/2022 due to the 988 implementation. See Milestone #33 in the industry 988 milestones list posted at https://www.nationalnanpa.com/transition-to-10-digit-dialing-for-988/index.html.</u>

Attachment #4

Activity	Description	Audience	Shared or Individual Service Provider	Start Date	Completed Date	<u>Recommended Due Date</u>	<u>Status/Notes</u> <u>Explanation or Rationale</u>
21	New NPA/Area Code assigned and implementation completed			13 months after ISD; 1 month after mandatory dialing	<u>9 months after ISD</u>	<u>10/01/2022</u>	<u>New overlay area code becomes effective on 10/01/2022.</u>