

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of the North American)
Numbering Plan Administrator, on)
behalf of the California)
Telecommunications Industry, for)
Relief of the 559 Numbering Plan Area)

Docket No. _____

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

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Dated: January 26, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION
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**APPLICATION OF THE
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TELECOMMUNICATIONS INDUSTRY FOR RELIEF OF
THE 559 NUMBERING PLAN AREA**

The North American Numbering Plan Administrator (“NANPA”), as the neutral third-party numbering plan area (“NPA”) (also referred to as “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 559 NPA is projected to exhaust its Central Office codes (often referred to as “CO” or “NXX” codes) during the third quarter of 2025 and is in need of relief. The Industry respectfully requests that the Commission expeditiously approve the Industry’s recommended plan to implement the all-services distributed overlay as set forth herein. The Industry recommends that it implement an all-services distributed overlay based upon a 13-month schedule that

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 559 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.

will be completed at least six months prior to the projected exhaust of the 559 NPA.³ Pursuant to the NPA Code Relief Planning and Notification Guidelines (“NPA Relief Guidelines”), once “the regulator issues an order (or other written approval) for NPA relief, NANPA should be provided approximately 75 calendar days from the date of the order (or other written approval) to assign a new NPA, ensure a press release is issued to announce the new NPA, to schedule and facilitate an implementation meeting, and publish the Planning Letter(s).”⁴

I. Background

The Commission approved a geographic split of the 209 NPA in 1997, introducing the 559 NPA in November 1998. In 1999, the 559 NPA was projected to exhaust during the fourth quarter of 2002 and the relief planning process was initiated. Subsequent implementation of number conservation measures such as thousands-block number pooling delayed the need for relief until now.

The 559 NPA is located in central California in the San Joaquin Valley. It includes all or portions of Fresno, Madera, Mariposa, Merced, Tulare, and Kings counties and serves communities including but not limited to Clovis, Coalinga, Fresno, Madera, Porterville, Reedley, Selma, and Visalia. The 559 NPA is bordered to the north by the 209/350 NPA, to the east by the 760/442 NPA, to the south by the 661 NPA, and to the west by the 831 and 805/820 NPAs.

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources.

³ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 1, 2022) (“NPA Relief Guidelines”), §7.2, requires that relief be implemented six months prior to exhaust.

⁴ NPA Relief Guidelines at §5.10.1.

NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. The NPA Relief Guidelines direct NANPA to prepare relief options for an NPA prior to the Industry meeting, generally 36 months in advance of the projected exhaust date.⁵ The projected exhaust of the 559 NPA in April 2022 was fourth quarter 2025. However, in October 2022, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2022 NRUF Report”) which indicated that the 559 NPA would exhaust one quarter sooner, during the third quarter of 2025.⁶

NANPA distributed a notice to the Industry on November 23, 2022, containing an Initial Planning Document (“IPD”).⁷ The IPD included two alternatives for relief, an all-services distributed overlay and a geographic split, for review prior to the relief planning meeting. The Industry met via web conference on December 21, 2022⁸ and after a thorough review of the presented relief alternatives, reached consensus to recommend Alternative #1, the all-services distributed overlay of the 559 NPA.

II. Description of the Relief Alternatives

- **Alternative #1: an all-services distributed overlay of the 559 NPA**

A new overlay NPA code would be assigned to the same geographic area occupied by the existing 559 NPA. Customers would retain their current telephone numbers;

⁵ Per NPA Relief Guidelines §5.12.

⁶ October 2022 NRUF and NPA Exhaust Analysis (“October 2022 NRUF Report”). The October 2022 NRUF Report can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.html.

⁷ NANPA’s meeting notice with IPD including associated maps is attached as Exhibit A.

⁸ The December 21, 2022 meeting minutes including Industry consensus on pros and cons for each relief alternative are attached as Exhibit B.

however, 10-digit or 1+10-digit local dialing by all customers within and between NPAs in the affected area would be required. CO code assignments will not be made from the new overlay NPA until all remaining available CO codes in the 559 NPA are allocated. There are 59 rate centers in the 559 NPA. At the current rate of CO code assignment in the 559 NPA, the projected life of this alternative would be 36 years.

- **Alternative #2: a geographic split of the 559 NPA**

The 559 NPA would be split into two distinct geographic areas with one area retaining the 559 NPA and a new NPA code assigned to the other area. A recommendation is not made by NANPA or the Industry for which area would retain the 559 NPA and which area would receive the new NPA.

Within each NPA, seven-digit local dialing would be retained but 10-digit or 1+10-digit local dialing would be required between the two NPAs. The proposed alternative would split the 559 NPA into separate NPAs designated as Area A and Area B, as shown in the IPD, Alternative #2 559 NPA Split Rate Center Map. There are 23 rate centers in Area A and 36 rate centers in Area B. At the current rate of CO code assignment in the 559 NPA, the projected lives for each area of this alternative would be 40 years for Area A and 35 years for Area B.

III. Industry-Recommended Relief Alternative

At the relief planning meeting, the Industry participants discussed the pros and cons of each relief alternative and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay of the 559 NPA, as the method of relief. The Industry supported the all-services distributed overlay alternative because it is the most equitable and consumer-friendly alternative. Customers would retain their existing NPA and telephone number, customer education and the technical implementation would be simple and straightforward, and it will take significantly less time to implement than any

geographic split.

The Industry-recommended dialing plan set forth in the following table is consistent with that all-services distributed overlay implementation:

Dialing Plan for the 559 NPA All-Services Distributed Overlay

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

**10-digit dialing permissible at wireless providers' discretion*

The Industry reached consensus to implement the new relief NPA in accordance with 13-month schedule⁹ and the attached “California 559 Area Code Relief Industry Statement for the Record and Recommended Public Education Plan (“PEP”) for the California 559 Overlay Implementation.”¹⁰ The schedule, outlined below, does not include specific dates, but rather timeframes to identify

⁹ The NPA Relief Guidelines at §7.2.

¹⁰ The PEP in Attachment #1 to the Application is modeled after other PEPs most recently approved for other California overlay implementations. Specifically, the recommended PEP in Attachment #1 is a combination of the PEP for the CA 909/840 overlay, the Industry milestones used to educate customers about mandatory 1+10-digit dialing due to the 988 mandate, and the PEPs mostly recently used for the CA 209/350 and 707/369 overlays. The recommended PEP removes any paid advertising requirements and limits the special outreach requirements to include only the necessary groups that might require such special notifications.

the phases of implementation. Once the Commission has approved the Application, the Industry will select specific dates at an initial implementation meeting to ensure the dates do not interfere with certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission's prompt approval of the Application and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

**The Implementation Timeframe Schedule
for the 559 All-Services Distributed Overlay**

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

**CO codes in the new NPA will not be assigned until all available codes in the existing 559 NPA are allocated.*

After the Commission releases a final decision, NANPA will need approximately 75 calendar days to assign the new NPA, work with the Commission to issue a press release announcing the new NPA, schedule and facilitate an Industry implementation meeting, and publish a Planning Letter. The Industry will then form an implementation committee to implement the new area code that should begin at least 19 months prior to

exhaust of the 559 NPA.¹¹ The Customer Education Milestones can be found in the “California 559 Area Code Relief Industry Statement for the Record and Recommended Public Education Plan for the California 559 Overlay Implementation” included in this Application as Attachment #1. The Technical Milestones table below outlines the methods and processes the Industry typically utilizes in California to implement an initial overlay:

Customer Education Milestones:

See Attachment #1 to the Application.

Technical Milestones:

	Responsibility
1 Obtain industry test code from NANPA and activate the test number	One Service Provider volunteer
2 Open the test code in carriers’ network	All Service Providers
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.)	All Service Providers
4 Ensure Highway boxes are programmed with 1+10-digit dialing	Co-chairs of industry committee
5 Network ready for Permissive Dialing	All Service Providers
6 Create Permissive Dialing Industry Contact List	Co-chairs of industry committee
<u>Permissive 1+10 Digit Local Dialing Begins</u>	
7 Establish NPA Specific type of Trunks	All Service Providers (as needed)
8 Completion of 10-digit signaling transition between carriers’ networks	All Service Providers
9 Require email from service providers when the 10-digit signaling transition between carriers’ networks has been completed	All Service Providers
10 Update on all speed calling, call forwarding numbers and voicemail	All Service Providers

¹¹ A total of 21.5 months is needed to accommodate NANPA’s administrative processes, and to complete a 13-month implementation schedule at least 6 months prior to the exhaust of the 559 NPA.

	options in embedded database to reflect 1+10-digit dialing	
11	Recorded announcements in Place and Tested	All Service Providers
	<u>E911 Work Plan</u>	
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13	Ensure SRDB table has new NPA built	E911 Providers
14	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
16	Update PSAP equipment to recognize new NPA	PSAPs
17	Trunk Orders Complete	All Service Providers (as needed)
18	Build E911 Network/Tandem Translations	E911 Providers
19	Verify if all PSAP work has been completed	E911 Providers
20	Activate E911 Network/Tandem Translations	E911 Providers
	<u>Mandatory 1+10 Digit Local Dialing Begins</u>	
	New NPA/Area Code effective and implementation completed (1 month after mandatory dialing)	

IV. Conclusion

The Industry respectfully requests that the Commission approve and issue a final decision in response to this Application for a new all-services distributed overlay NPA of the 559 NPA, the recommended implementation schedule for relief of the 559 NPA, and the attached PEP without a hearing. To the extent possible, the Industry requests that the Commission forego in-person public meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this Application, the Industry will implement an all-services distributed overlay over the 559 NPA in accordance with the implementation schedule set forth above and the attached PEP.

As such, the Industry respectfully requests that the Commission issue the final

decision granting this Application no later than September 30, 2023 to provide sufficient time for NANPA to complete its administrative tasks, and for the Industry to complete implementation of the all-services distributed overlay at least six months prior to exhaust of the 559 NPA.

Respectfully submitted,

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January 26, 2023

VERIFICATION

I, Florence Weber, hereby state the following under penalty of perjury. I am the Vice President of the North American Numbering Plan Administrator. 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 559 Numbering Plan Area” (“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: January 26, 2023

ATTACHMENT 1

California 559 Area Code Relief Industry Statement for the Record and Recommended Public Education Plan for the California 559 Overlay Implementation

The Industry respectfully requests that the CPUC approve the industry's application to implement an all-services distributed overlay for relief of the 559 area code, including the proposed implementation interval and the attached proposed Public Education Plan (PEP), no later than September 30, 2023. The Industry's proposed schedule and PEP 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. As it has for each of the 14 overlays implemented in California over the last 16+ years, the Industry will work together to ensure the 559 overlay implementation is successful, and will establish a PEP Task Force to coordinate consistent customer education messaging across service providers.

The last overlay implemented in California where mandatory 1+10-digit dialing was introduced was the California 909/840 overlay that was completed in February 2021. Since then, the Industry has implemented mandatory 1+10-digit dialing in nine other area codes in California, due to the federal mandate to implement the 988 abbreviated dialing code to reach the national 988 Suicide and Crisis Lifeline.¹ In implementing mandatory 1+10-digit dialing successfully in those nine other California area codes, the Industry followed the industry-developed milestones list.² Importantly, this industry-developed milestones list did not include any paid advertising.

No paid advertising is necessary for a successful implementation of an overlay to relieve the 559 area code because:

- Californians are already very familiar with multiple area codes and mandatory 1+10-digit dialing. Mandatory 1+10-digit dialing is the predominant dialing plan in California, required in 35 of 38 area codes (92%) once the 707/369 overlay is implemented on February 1, 2023.
- The Industry is quite experienced in educating customers about mandatory 10-digit dialing (or 1+10-digit dialing where required), having implemented 35 overlays in 25 other states (including the District of Columbia) across the country over the last 10 years.³ No paid advertising was used in those 35 overlays.
- The use of news releases, particularly when issued by the CPUC, has been effective in educating the public about the overlay and supplementing individual service provider customer education notices.
- 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.
- Educating 559 customers about mandatory 1+10-digit dialing is a familiar exercise for the Industry. For routine customer education messaging about mandatory 1+10-digit dialing, paid advertising and a funded PEP doesn't make fiscal sense.

The recommended attached PEP is a combination of the PEP for the CA 909/840 overlay, the Industry milestones

¹ See <https://www.fcc.gov/988-suicide-and-crisis-lifeline> and NANPA Planning Letter 556 available at https://www.nationalnanpa.com/pdf/PL_556.pdf.

² See Industry Milestones List available on the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/docs/Milestones_10DDfor988_07072022.xlsx.

³ Approximately 44 overlays have been implemented across 25 states and the District of Columbia in the last 10 years; See NANPA's *Area Codes Introduced Over The Past Ten Years* report, available at <https://www.nationalnanpa.com/enas/npasOverLast10YearsReport.do>. Of those, 35 were initial overlays where mandatory 10-digit dialing education was needed, and 9 were additional overlays where mandatory 10-digit dialing was already in place.

ATTACHMENT 1

used to educate customers about mandatory 10-digit dialing due to the 988 mandate, and the PEPs for the 209/350 and 707/369 overlays. The recommended PEP removes any paid advertising requirements and limits the special outreach requirements to include only the necessary groups that might require such special notifications. Specifically, there's no need for special outreach to the following community-based organizations because they will be educated by their respective service providers: senior, consumer and other advocacy/activist organizations; and chambers of commerce, city councils, and other key government agencies.

Recommended Public Education Plan (PEP) for the 559 All-Services Distributed Overlay Thirteen-Month Implementation Plan

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date
1	Effective date of decision approving an area code overlay for relief of the existing 559 area code.	N/A	N/A	Date of Decision (DOD)
2	Issue News Release No. 1 within the 559 area code region announcing the overlay area code relief plan and its geographic boundaries, the new overlay area code, key implementation dates, the dialing change, and how customers should prepare for the overlay. Utilize the CPUC's media list and local government contacts, and post the CPUC news release to CPUC website and social media platforms.	All customers	CPUC	Within one week of DOD
3	NANPA 559 overlay implementation meeting, and request for industry participation on Public Education Plan (PEP) task force. Determination of Implementation Start Date (ISD).	CPUC staff and industry	Shared	6 weeks after DOD
4	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	1 month after ISD
5	Email targeted letters with the information in the Customer Notification No. 1, to (1) public safety organizations and PSAPs, (2) the California alarm provider association, (3) the telephone directory publishers association, (4) the coin-operated pay telephone provider association, and (5) California Relay Services throughout the 559 area code region. Request that these organizations distribute the information to their members.	Public safety organizations and PSAPs, alarm providers, telephone directory publishers, coin-operated pay telephone providers, and California Relay Services	Shared	2 months after ISD

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6	Overlay information distributed internally as a job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual	3 months after ISD
7	559 overlay update to industry websites.	All customers	Individual	3 months after ISD
8	Issue News Release No. 2 within the 559 area code region, describing the 559 area code overlay plan and its geographic boundaries, the 1+10-digit dialing requirement, the remaining key implementation dates, and how customers should prepare for the overlay. Utilize the CPUC's media list and local government contacts, and post the news release to the CPUC website and social media platforms.	All customers	Shared and CPUC	4.5 months after ISD
9	Correct payphone signage to include updated dialing instructions	Customers that use payphones	Individual	5 months after ISD
10	Provide to CPUC Communications Division second email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	5.5 months after ISD
11	Issue Customer Notification No. 1 to customers with 559 telephone numbers: Announce the new 559 area code overlay plan, including information about 1+10-digit dialing and indicate the affected geographic area, the key implementation dates, and how customers should prepare for the overlay.	All customers	Individual	6 months from ISD
12	Begin Permissive 7- or 1+10-Digit Dialing			6 months from ISD
13	Email reminder targeted letters with the information in the Customer Notification No. 2, to (1) public safety organizations and PSAPs, (2) the California alarm provider association, (3) the telephone directory publishers association, (4) the coin-operated pay telephone provider association, and (5) California Relay Services throughout the 559 area code region. Request that these organizations distribute the information to their members.	Public safety organizations and PSAPs, alarm providers, telephone directory publishers, coin-operated pay telephone providers, and California Relay Services	Shared	11 months from ISD

ATTACHMENT 1

14	Issue News Release No. 3 reminding the public of the 559 overlay area code relief plan, the overlay area code geographic boundaries, and the new overlay area code for issue within the 559 area code overlay region. Post CPUC news release to CPUC website and social media platforms.	All customers	Shared and CPUC	11.5 months after ISD
15	Issue Customer Notification No. 2 to customers with 559 telephone numbers: Announce the new area code plan, include information about mandatory 1 + 10 digit dialing, and indicate the affected geographic area, the remaining key implementation dates, and how customers should prepare for the overlay.	All customers	Individual	12 months from ISD
16	Complete implementation of recorded message announcing mandatory dialing	All customers	Individual	12 months from ISD
17	Begin Mandatory 1+10-Digit Dialing (1 month before the new NPA's effective date)			12 months from ISD
18	Provide to CPUC Communications Division third email or written confirmation from the California Telecommunications Industry identifying media coverage (including local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	12.5 months after ISD
19	Published Directories: Add information on cover to alert customers in 559 overlay area about the new overlay area code	All customers	Individual	13 months after ISD
20	New NPA/Area Code effective and implementation completed (1 month after mandatory dialing)			13 months from ISD

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 in Exhibit B, a recorded webcast regarding the Industry's proposed relief plan will be made available on the California Public Utilities Commission's website on April 4, 2023. Accordingly, hearings are not necessary.

Issues to be Considered: Whether the Commission should adopt the Industry's recommended all-services distributed overlay with a corresponding 13-month implementation schedule, and the Industry's recommended Public Education Plan ("PEP") as the preferred form of relief for the 559 numbering plan area ("NPA").

Proposed Schedule: NANPA projects that the 559 NPA will exhaust during the third quarter of 2025. As explained in the Application, the Industry recommends a 13-month schedule to implement the all-services overlay. To ensure the Industry has

sufficient time to implement relief before the 559 NPA exhausts, the following schedule is proposed:

Application Filed January 26, 2023

Expiration of Protest Period May 4, 2023

Final Decision Issued September 30, 2023

EXHIBIT A



November 23, 2022

To: All 559 NPA Code Holders and Interested Industry Members (California)

Subject: California 559 NPA Initial Planning Document Review Meeting

The North American Numbering Plan Administrator (“NANPA”) is responsible for initiating area code relief (in accordance with the NPA Code Relief Planning and Notification Guidelines, ATIS-0300061) in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically thirty-six months prior to exhaust. As of October 2022, the 559 NPA in California is projected to exhaust during the third quarter of 2025, and relief planning is to begin immediately.

Accordingly, on December 21, 2022, NANPA will convene an NPA relief planning meeting to reach consensus among members of the California Telecommunications Industry (“Industry”) on a single plan of relief for the 559 NPA. The resulting relief plan will be filed with the California Public Utilities Commission (“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.

Also attached to this notice is the meeting agenda, consensus process, the California 559 NPA central office code summary, thousands-block statistics reports, relief planning meeting aids, Service Provider CO Code assignments by OCN, customer and technical milestones and associated maps.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on December 21, 2022. Prior experience demonstrates that this could be the only meeting of the Industry before a decision is reached on a recommended relief plan that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Wednesday, December 21, 2022

Time: 12:00 pm PT; 1:00 pm MT; 2:00 pm CT; 3:00 pm ET

Join Zoom Meeting

<https://somos.zoom.us/j/86355927296?pwd=SldvaUNmTGZJV3BSNGNzL0VUZm1adz09&from=addon>

Meeting ID: 863 5592 7296

Password: 427281

One tap mobile

8778535257,,86355927296# US Toll-free

8884754499,,86355927296# US Toll-free

Dial by your location
877 853 5257 US Toll-free
888 475 4499 US Toll-free
Meeting ID: 863 5592 7296

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 559 NPA, you are encouraged to sign up to NANPA's NANP Administration System ("NAS") NANP Notification System ("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@nanpa.com.

Sincerely,

Heidi A. Wayman
Manager, Data Management
NANPA

CC: Joanne Leung – CPUC Communications Division

**California 559 NPA
Initial Relief Planning Meeting
via Web Conference**

December 21, 2022 - 12:00 PM (PT)

AGENDA

Welcome, Introductions, Consensus Definition

NANPA's Role and Responsibilities

Review INC Guidelines

Review 559 NPA Background, History and Status

Consensus on Relief Alternative

Consensus on Implementation Intervals

Consensus on Customer Education & Technical Milestones

Review of State Law and PU Code Notification Requirements

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.

5 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, expansion of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.
- e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.
- f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit local dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹
- g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

because the model assumptions are based on the premise that all NXXs available for assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

5.1 Determine the Expected NPA Exhaust Period

Through the use of historical growth data as well as expected changes (e.g., expansion of thousands-block pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results, should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six (6) months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six (6) months prior to the earliest likely exhaust date.

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA will distribute the Initial Planning Document to the industry within four (4) weeks of the declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more than eight (8) weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is an artificial exhaust projection based on the monthly rationing amount determined by the industry and not reflective of the true need for relief.
- In cases where the NPA is in jeopardy and CO codes are rationed, two exhaust dates will be reported: (1) the exhaust date at jeopardy declaration, and (2) the exhaust date with controlled allocation.

5.2 Identify the Alternative Relief Methods Available

Within the affected NPA, the NANPA should next identify possible NPA relief alternatives and methods from among those identified in Section 6.

5.3 Define the Attributes of Each Alternative or Method

For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers, and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, and local dialing plans using 7-digits or 10-digits should be made at this point. Examples of attributes are shown in Appendix E.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning

The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The IPD should be provided at least four (4) weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.

5.5 Conduct Industry Meetings/Conference Calls with the Goal of Reaching Industry Consensus on a Relief Plan

Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration³. NANPA shall moderate these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry consensus, subsequent meetings/conference calls shall be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

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6 Alternative Relief Methods

All of the currently identified code relief alternatives are described below, but depending on the particular NPA and the distribution of assigned NXXs within it, some alternatives may not be compliant with the criteria in Section 5.0 above (e.g., in an NPA with a high concentration of assigned NXXs in one or only a few rate centers, the overlay may be the only possible relief method). Possible impacts of these alternatives are found in Appendices B, E and G.

6.1 NPA Split Method

By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA.

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

6.2 Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift/realignment occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change, and number changes are mandatory for customers assigned numbers from NXX codes that are moved to the adjacent NPA. This method applies to multi-NPA states or provinces only. Boundary realignments must follow rate center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Distributed Overlay Method⁴

An all-services distributed overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs.⁵ Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the SP's discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a permissive dialing period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs. They are listed below:

7 Other Relief Planning Considerations

This section describes miscellaneous considerations that should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Regulatory Involvement

Regulatory Involvement - Involvement of the appropriate regulatory authority staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

⁴ The LNP Working Group Best Practice 30 supports the all-services distributed overlay as the preferred form of area code relief, and was endorsed by the North American Numbering Council (NANC) on September 18, 2013. See <http://www.nanc-chair.org/docs/documents.html>.

⁵ 47 CFR §52.19 (c) (3) (ii).

7.2 Timing and Schedules

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

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Annex B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- quantity of subscribers who will have to undergo number changes
- impact on customer premise equipment (CPE), e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- public reaction to and political involvement in boundary decisions
- impact on market identity/recognition, geographic identity, public familiarity
- public costs such as reprinting of stationery, business cards, advertising, and CPE and other database reprogramming.

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks
- LNP compliance impacts

Industry Concerns

- length of relief period

-
- NPA code utilization
 - Number Pooling impact on length of relief period (where applicable)
-

Annex E

General Attributes of the Most Common Relief Alternatives

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

Relief Planning Meeting Aid

Dialing Plans and Implementation Intervals

This meeting aid has examples of industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA) (including Extended Area Service (EAS) calls)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

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

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

*CO codes in the new NPA will not be assigned until all available codes in the 423 NPA have been exhausted.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	8 Months
Earliest Activation of CO Codes in the new NPA*	1 Month after the completion of customer education and network preparation period No later than (insert QTR)

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

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

(10-digit dialing in place)

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period Ends	9 months after the Implementation Start Date selected by the Industry
Earliest Activation of CO Codes in the new NPA*	9 months after the Implementation Start Date selected by the Industry No later than (insert QTR)

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

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

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

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period (<i>Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable</i>) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation (<i>Effective date for codes from the new NPA</i>)	End of Recording Period
Total Implementation Interval	15 months

Relief Planning Meeting Aid

Pros and Cons for Relief Alternatives

This meeting aid is a compilation of industry developed pros and cons from NPA relief planning meetings and is prepared to assist the participants in evaluating the attributes of the relief alternatives being considered.

Overlay Pros and Cons:

Pros:

Alternative #					
					1 All existing customers would retain the 559 area code and would not have to change their telephone number.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split.
					3 Less customer confusion and easier education process.
					4 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
					5 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					6 No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split.
					7 Minimizes call routing issues, especially with ported numbers.
					8 Easier for service providers to implement from a translations, billing and service order system perspective.
					9 Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table.
					10 The Commission would not have to decide which side retains the 559 NPA as would be required for an NPA split.
					11 Does not split cities, counties or communities of interest into different area codes.
					12 Does not impact some wireless carriers that have to reprogram handsets manually as would be required for an NPA split.
					13 No technical impacts to number portability, text messaging or multimedia messaging.
					14 An all-services distributed overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice as would be required for a split.
					15 Helps move customers toward nationwide 10-digit dialing.
					16 Transitioning to 10-digit local dialing will enable central office codes protected for 7-digit routes to be released for assignment.

Relief Planning Meeting Aid

Pros and Cons for Relief Alternatives

Overlay Pros and Cons:

Cons:

Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 559 NPA and the new overlay NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.).
					4 Loss of geographic identity with an overlay if assigned a telephone number in the new overlay NPA.
					5 Confusion due to differences in state dialing requirements between local and toll calling; customers dialing 10 digit vs 1+10-digit for local calls.

NPA Split Pros and Cons

Pros:

Alternative #					
					1 Maintains seven-digit dialing for local calls within the same NPA.
					2 Approximately half of the customers would not experience a change if they keep the 559 NPA.
					3 Projected lives are balanced.
					4 <u>The projected lives are slightly more balanced than Alternative #.</u>
					5 This alternative allows _____ to maintain operations on one side of the split line.
					6 Maintains geographic identity of the 559 area code.
					7 Keeps the rate centers on both sides of the split lines intact.

Relief Planning Meeting Aid

Pros and Cons for Relief Alternatives

NPA Split Pros and Cons:

Cons:

Alternative #					
					1 Requires approximately half of 559 NPA customers to change their area code.
					2 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers.
					3 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
					4 All 559 NPA customers previously went through a split 24 years ago and half will have to change their area code again.
					5 Difficult Commission decision on which side retains the 559 NPA.
					6 Longer time period needed for service providers to implement this type of relief.
					7 Customers whose numbers change must contact friends, family and business associates with the telephone number changes.
					8 More complicated and costly to implement for service providers in their billing, translations and database systems.
					9 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
					10 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
					11 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
					12 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
					13 Split requires significant challenges to service provider's operational support systems and network elements.
					14 Splits cause customer confusion with caller ID during implementation.
					15 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					16 Splits require the 559 NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					17 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					18 Splits require the 800/SMS database to be updated.

Relief Planning Meeting Aid

Pros and Cons for Relief Alternatives

					19	Splits reduce the geographic area served by one area code.
					20	Splits the city(s), counties or legislative districts into different area codes.
					21	Splits communities of interest.
					22	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the 559 area code during permissive dialing.
					23	The last split implemented was in 2007. There is additional complexity to implement a split now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.
					24	This split disrupts the SP's host-remote switch arrangement.
					25	Splits _____ operating territory between two NPAs.
					26	_____ EAS calling is heavily disrupted.

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 Education 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 new overlay NPA.	
		5 Update websites with information regarding new overlay NPA	
		6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	
		<u>After Permissive 7 and 10-Digit Dialing Begins</u>	
		7 Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	
		9 Update social media with information regarding new overlay NPA.	
		10 Update websites with information regarding new overlay NPA	
		11 Issue second mandatory press release just prior to the new overlay NPA's effective date	

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	
		<u>Permissive Dialing Begins</u>	
		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 Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	

Relief Planning Meeting Aid

Customer Education and Technical Milestones

		13 Ensure SRDB table has new NPA built	
		14 Notify PSAPs, PSALI customers and County Coordinators	
		15 Review and Submit CLEC Trunk Order Requests to local provider if needed	
		16 Update PSAP equipment to recognize new NPA	
		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	

California 559 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
559	ALPAUGH	ALPAUGH
559	AUBERRY	AUBERRY
559	AVENAL	AVENAL
559	BADGER	BADGER
559	BIG CREEK	BIG CREEK
559	BURREL	BURREL
559	CARUTHERS	CARUTHERS
559	CHOWCHILLA	CHOWCHILLA
559	CLOVIS	CLOVIS
559	COALINGA	COALINGA
559	COARSEGOLD	COARSEGOLD
559	CORCORAN	CORCORAN
559	DEL REY	DEL REY
559	DINUBA	DINUBA
559	DUCOR	DUCOR
559	DUNLAP	DUNLAP
559	EXETER	EXETER
559	FIREBAUGH	FIREBAUGH
559	FOWLER	FOWLER
559	FRESNO	FRESNO
559	FRIANT	FRIANT
559	GRANTGROVE	GRANT GROVE
559	HANFORD	HANFORD
559	HURON	HURON
559	KENNEDY MW	KENNEDY MEADOWS
559	KERMAN	KERMAN
559	KINGSBURG	KINGSBURG
559	LATON	LATON
559	LEMON COVE	LEMON COVE

559	LEMOORE	LEMOORE
559	LINDSAY	LINDSAY
559	MADERA	MADERA
559	MENDOTA	MENDOTA
559	MIRANTPHST	MIRAMONTE PINEHURST
559	NORTH FORK	NORTH FORK
559	O NEALS	O NEALS
559	ORANGECOVE	ORANGE COVE
559	PARLIER	PARLIER
559	PIXLEY	PIXLEY
559	PORTERVL	PORTERVILLE
559	RAYMOND	RAYMOND
559	REEDLEY	REEDLEY
559	RIVERDALE	RIVERDALE
559	SANGER	SANGER
559	SANJOAQUIN	SAN JOAQUIN
559	SELMA	SELMA
559	SEQUOIA	SEQUOIA
559	SHAVER	SHAVER
559	SPRINGVL	SPRINGVILLE
559	SQUAW VLY	SQUAW VALLEY (FRESNO)
559	STRATFORD	STRATFORD
559	TERRABELLA	TERRA BELLA
559	THREERIVRS	THREE RIVERS
559	TIPTON	TIPTON
559	TIVYVALLEY	TIVY VALLEY
559	TULARE	TULARE
559	VISALIA	VISALIA
559	WISHON	WISHON
559	WOODLAKE	WOODLAKE

California 559 Central Office Code Holder List

Company	OCN
AMERICAN MESSAGING SERVICES, LLC	6906
AMERICAN MESSAGING SERVICES, LLC	9748
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - CA	981E
BCM ONE CLOUD COMMUNICATIONS, LLC	683G
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - CA	6006
CENTURYLINK COMMUNICATIONS, LLC	508J
CHARTER FIBERLINK CA-CCO, LLC - CA	776C
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CSC WIRELESS, LLC	425J
DISH WIRELESS, LLC	490J
DUCOR TEL. CO.	2313
EXIANT COMMUNICATIONS LLC	114J
FRACTEL, LLC	965H
FRONTIER CALIFORNIA INC.	2319
FRONTIER CALIFORNIA INC.	4420
HD CARRIER LLC	321J
IP HORIZON LLC	515J
KERMAN TEL. CO.	2324
LEVEL 3 COMMUNICATIONS, LLC - CA	8826
LEVEL 3 TELECOM OF CALIFORNIA, LP - CA	7718
LOCAL ACCESS SERVICES LLC - CA	222H
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - CA	7128
METROPCS, INC.	5562
MPOWER NETWORKS SERVICES INC. - CA	748D
NEW CINGULAR WIRELESS PCS, LLC	6010
NUSO, LLC	551G
O1 COMMUNICATIONS, INC. - CA	4129
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - CA	649C
PACIFIC BELL	9740
PEERLESS NETWORK OF CALIFORNIA, LLC - CA	373F
PONDEROSA TEL. CO.	2332

RADIANTIQ LLC	566J
RCLEC, INC. - CA	886G
SIERRA TEL. CO., INC.	2338
SKYE TELECOM LLC DBA SKYETEL	622J
SPRINT SPECTRUM, L.P.	6664
TELEPORT COMMUNICATIONS AMERICA, LLC - CA	7145
TELNYX LLC	073H
TERRA NOVA TELECOM INC.	145J
T-MOBILE USA, INC.	6529
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J
U.S. TELEPACIFIC CORP. DBA TPX COMMUNICATIONS	671J
UTILITY TELECOM GROUP, LLC - CA	9262
VONAGE AMERICA LLC	197D
WAVENATION, LLC	700J
WIDE VOICE, LLC - CA	252F
XO CALIFORNIA, INC.	7262
YMAX COMMUNICATIONS CORP. - CA	258E

Thousands-block holders with No Central Office Codes Assigned

Company	OCN
US TELEPACIFIC CORP. - CA	7453

California Central Office Code Summary						
NPA	559					
Assigned NXXs	721					
Reserved NXXs	0					
Unavailable NXXs	20					
Available NXXs	59					
Total	800					
Code Assignment History	2017	2018	2019	2020	2021	2022
	6	2	6	13	33	18*
*As of November 23, 2022						
October 2022 NRUF and NPA Exhaust Analysis	3Q2025					
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).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	CA 559
MEETING DATE:	12/21/22
RATE CENTERS	
<i># Total</i>	59
<i># Mandatory</i>	31
<i># Mandatory-Single Service Providers (M*)</i>	7
<i># Optional</i>	19
<i># Excluded</i>	2
BLOCKS ASSIGNED	
<i># Total</i>	351
<i>(For time period 11/01/21- 11/23/22)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	316
<i>(As of preparation date: 11/23/22)</i>	
CODES ASSIGNED	
<i># Total</i>	27
<i># for Pool Replenishment</i>	24
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	3
<i>(For time period 11/01/21- 11/23/22)</i>	
CODES FORECASTED	
<i># Total</i>	10
<i># for Pool Replenishment and Dedicated Customers</i>	10
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 11/23/22)</i>	

Initial Planning Document
For
Relief of California 559 NPA
December 21, 2022

North American Numbering Plan Administrator

Heidi A. Wayman
Manager, Data Management

Background Information for the 559 NPA Relief Project

Relief Planning Background

In 1997 due to substantial growth in the 209 NPA, the California Public Utilities Commission approved a geographic split of the 209 NPA and the 559 NPA was introduced in November 1998. In 1999, the 559 was projected to exhaust during the fourth quarter of 2002. Due to number conservation measures including a monthly lottery as well as the implementation of thousands-block number pooling, area code relief planning has been delayed until now.

The 559 NPA covers the central portion of California and is in the San Joaquin Valley. The 559 area code includes all or portions of Fresno, Madera, Mariposa, Merced, Tulare, and Kings counties. It serves communities including but not limited to Clovis, Coalinga, Fresno, Madera, Porterville, Reedley, Selma, and Visalia.

The 559 NPA is bordered to the north by the 209/350 NPA overlay, to the east by the 760/442 NPA overlay, to the south by the 661 NPA, and to the west by the 831 and 805/820 NPAs.

Exhaust Forecast

The October 2022 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2022 NRUF Report”), published by NANPA, projected the exhaust of the 559 NPA during the third quarter of 2025 (3Q2025).

CURRENT DIALING PLAN OF THE 559 NPA

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	7 digits (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)

209/350 AREA CODE

559 AREA CODE

831 AREA CODE

805/820 AREA CODE

661 AREA CODE

442/760 AREA CODE



California 559 Area Code Rate Center Map

- Area Code Boundary
- Rate Center Boundary

September 2022

CALIFORNIA 559 NUMBERING PLAN AREA (NPA) RELIEF ALTERNATIVES

NPA Established: November 1998

ALTERNATIVE DESCRIPTIONS

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 559 NPA. Customers would retain their current telephone numbers; however, eleven-digit or 1+10 digit local dialing (1+NPA+NXX+XXXX) by all customers within and between NPAs in the affected area would be required. CO codes in the new overlay NPA will be assigned upon request with the effective date of the new NPA and only after all assignable CO codes in the 559 NPA have been allocated. The projected life of this alternative would be 36 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 559 NPA would be divided into two geographic areas. A new area code would be assigned to either Area A or Area B. NANPA does not make a recommendation for either Area A or Area B to retain the 559 NPA. Within each NPA, seven-digit local dialing would be permitted, but 1+10 digit dialing will be required between the 559 and the new NPA. The proposed split boundary is shown in Alternative #2 split map. The projected life of the two geographic areas after the split would be:

AREA A

Total CO Codes = 380
Total Rate Centers = 23
Area code life in years = 40

AREA B

Total CO Codes = 358
Total Rate Centers = 36
Area code life in years = 35

N
E
V
A
D
A

209/350 AREA CODE

559 Area Code and
New Overlay Area Code

831 AREA CODE



805/820 AREA CODE

661 AREA CODE

442/760 AREA CODE



**Alternative #1 All-Services
Distributed Overlay**

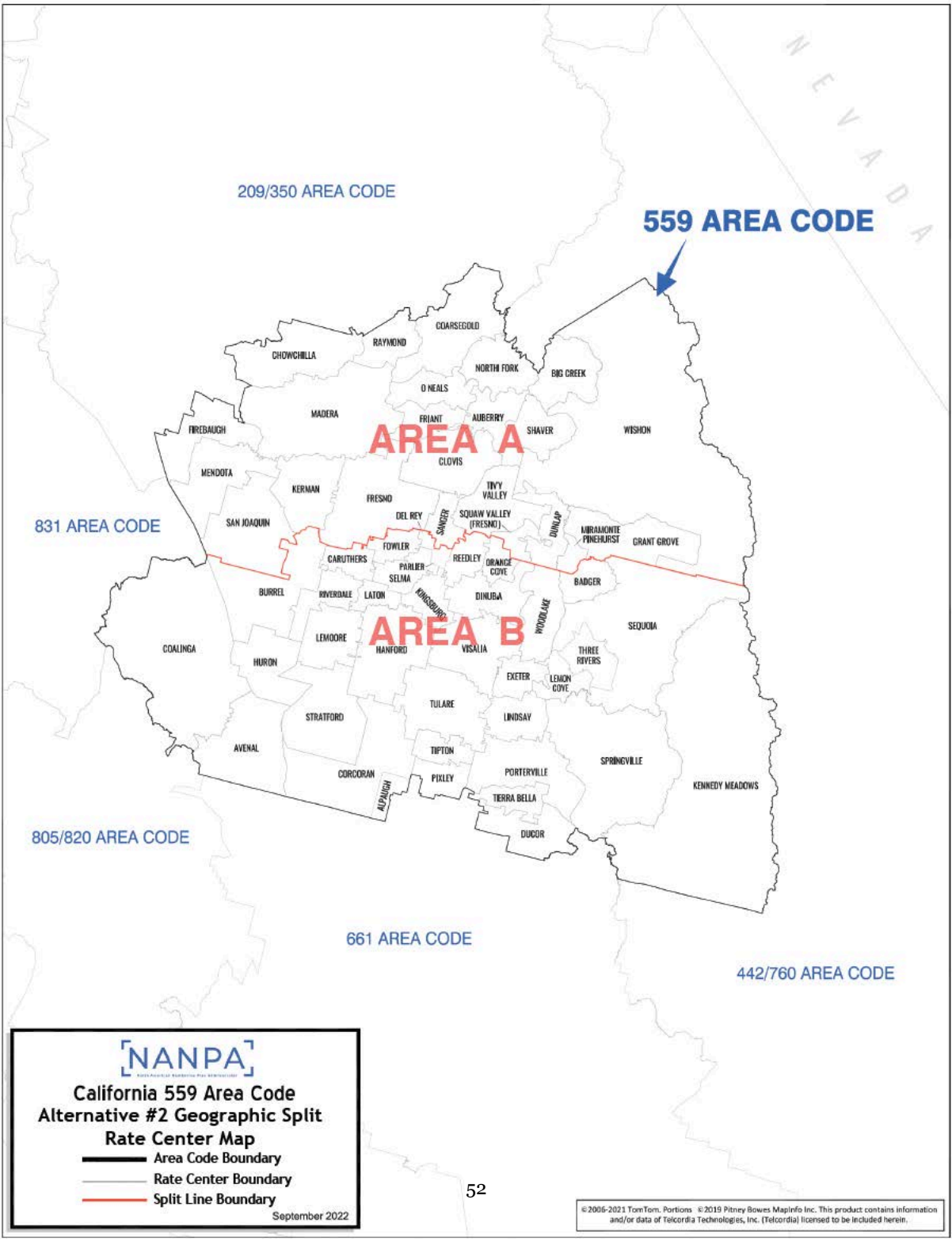
-  Area Code Boundary
-  Rate Center Boundary

California 559 NPA Rate Center Split List – AREA A

Abbreviated Rate Center	Rate Center Full Name	AREA
AUBERRY	AUBERRY	A
BIG CREEK	BIG CREEK	A
CHOWCHILLA	CHOWCHILLA	A
CLOVIS	CLOVIS	A
COARSEGOLD	COARSEGOLD	A
DUNLAP	DUNLAP	A
FIREBAUGH	FIREBAUGH	A
FRESNO	FRESNO	A
FRIANT	FRIANT	A
GRANTGROVE	GRANT GROVE	A
KERMAN	KERMAN	A
MADERA	MADERA	A
MENDOTA	MENDOTA	A
MIRANTPHST	MIRAMONTE PINEHURST	A
NORTH FORK	NORTH FORK	A
O NEALS	O NEALS	A
RAYMOND	RAYMOND	A
SANGER	SANGER	A
SANJOAQUIN	SAN JOAQUIN	A
SHAVER	SHAVER	A
SQUAW VLY	SQUAW VALLEY (FRESNO)	A
TIVYVALLEY	TIVY VALLEY	A
WISHON	WISHON	A

California 559 NPA Rate Center Split List – AREA B

Abbreviated Rate Center	Rate Center Full Name	AREA
ALPAUGH	ALPAUGH	B
AVENAL	AVENAL	B
BADGER	BADGER	B
BURREL	BURREL	B
CARUTHERS	CARUTHERS	B
COALINGA	COALINGA	B
CORCORAN	CORCORAN	B
DEL REY	DEL REY	B
DINUBA	DINUBA	B
DUCOR	DUCOR	B
EXETER	EXETER	B
FOWLER	FOWLER	B
HANFORD	HANFORD	B
HURON	HURON	B
KENNEDY MW	KENNEDY MEADOWS	B
KINGSBURG	KINGSBURG	B
LATON	LATON	B
LEMON COVE	LEMON COVE	B
LEMOORE	LEMOORE	B
LINDSAY	LINDSAY	B
ORANGECOVE	ORANGE COVE	B
PARLIER	PARLIER	B
PIXLEY	PIXLEY	B
PORTERVIL	PORTERVILLE	B
REEDLEY	REEDLEY	B
RIVERDALE	RIVERDALE	B
SELMA	SELMA	B
SEQUOIA	SEQUOIA	B
SPRINGVL	SPRINGVILLE	B
STRATFORD	STRATFORD	B
TERRABELLA	TERRA BELLA	B
THREERIVRS	THREE RIVERS	B
TIPTON	TIPTON	B
TULARE	TULARE	B
VISALIA	VISALIA	B
WOODLAKE	WOODLAKE	B



California 559 Area Code
Alternative #2 Geographic Split
Rate Center Map

- Area Code Boundary
- Rate Center Boundary
- Split Line Boundary

September 2022

EXHIBIT B



January 17, 2023

To: All 559 NPA Code Holders and Interested Industry Members (California)

Subject: Final Minutes of the Initial Relief Planning Meeting for the 559 NPA

Attached are the final minutes from the December 21, 2022 initial relief planning meeting to review the Initial Planning Document for the California 559 NPA. These minutes became final on January 13, 2023.

If you have any questions, you can email hwayman@nanpa.com or call (571) 363-3824.

Sincerely,

Heidi A. Wayman
Manager, Data Management
NANPA

CC: Joanne Leung – California Public Utilities Commission

**CALIFORNIA 559 NPA
Initial Relief Planning Meeting
Final Minutes
December 21, 2022**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, Manager, Data Management, North American Numbering Plan Administrator (“NANPA”), opened the meeting with introductions and a review of the agenda. A list of attendees can be found in Attachment #1.

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.

NANPA’s ROLE AND RESPONSIBILITIES

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

- NANPA starts the relief planning process within 36 months prior to exhaust of the Numbering Plan Area (“NPA”).
- NANPA distributes the meeting notice including the Initial Planning Document (“IPD”) four weeks prior to the initial relief planning meeting which was completed on November 23, 2022.
- NANPA facilitates a relief planning meeting for the California telecommunications industry (“Industry”) to reach consensus on the relief alternative to be included in the regulatory filing with the California Public Utilities Commission (“Commission”).
- The Industry determines through the consensus process any additional items to include in the filing such as the dialing plan, implementation intervals and comply with state-specific requirements.
- NANPA files the relief application, on behalf of the Industry, with the Commission that includes the Industry consensus items. NANPA will file the application for relief within six weeks of today’s meeting per the INC guidelines or as decided by the Industry or as required by the state statute.

INDUSTRY GUIDELINES

Heidi reviewed the following sections of the NPA Code Relief Planning and Notification Guidelines (“*Guidelines*”, ATIS-0300061, revised April 1, 2022):

- **5 NPA Relief Planning Process**
The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.

- **6.1 NPA Split Method**

By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA.

- **6.3 All-Services Distributed Overlay Method**

An all-services distributed overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs. Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the SP's discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a permissive dialing period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a permissive dialing period as part of implementation.

- **7.2 Timing and Schedules**

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

Heidi also referred the participants to Annex B which lists issues to be considered during NPA Relief planning and Annex E which lists general attributes of the most common relief alternatives. The Guidelines may be downloaded from the ATIS web site at www.atis.org.

The Heidi referred the participants to the relief planning meeting aids included in the meeting notice and the Customer Education and Technical Milestones. These meeting aids will assist the participants in their decision making during this relief planning meeting.

CENTRAL OFFICE (“CO”) CODE STATUS OF THE CALIFORNIA 559 NPA

Heidi provided a read-out of the monthly CO code assignment activity for the California 559 NPA. As of December 20, 2022, the 559 NPA has 721 CO codes assigned, 59 CO codes available for assignment and 20 unavailable CO codes. (See Attachment #2)

Exhaust Forecast

The April 2022 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA, projected the exhaust of the 559 NPA during the fourth quarter of 2025. When the October 2022 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2022 NRUF Report”) was published the exhaust date moved in one quarter to the third quarter of 2025 (3Q2025).

Thousands-block Status

As of December 20, 2022, the 559 NPA has 59 rate centers: 31 are mandatory, seven (7) are mandatory-single service provider (M*), 19 are optional, and two (2) are excluded from pooling. There are 316 thousands-blocks available for assignment. From December 1, 2023 through December 20, 2022, there were 329 thousands-blocks and 24 CO codes assigned: 22 for pool replenishment and two (2) for LRNs. The forecasted need for CO codes for the next twelve months is eight (8) CO codes for pool replenishment and dedicated customers. (See Attachment #3)

Heidi also reviewed the 559 NPA Rate Center Map, Rate Center Map with county boundaries, the CO Code Holder and Thousands-block Holder Tables.

RELIEF PLANNING BACKGROUND

In 1997, due to substantial growth in the 209 NPA, the California Public Utilities Commission approved a geographic split of the 209 NPA introducing the 559 NPA in November 1998. In 1999, the 559 was projected to exhaust during the fourth quarter of 2002. Due to number conservation measures including a monthly lottery as well as the implementation of thousands-block number pooling, area code relief planning was delayed until now.

The 559 NPA covers the central portion of California and is in the San Joaquin Valley. The 559 NPA includes all or portions of Fresno, Madera, Mariposa, Merced, Tulare, and Kings counties. It serves communities including but not limited to Clovis, Coalinga, Fresno, Madera, Porterville, Reedley, Selma, and Visalia.

The 559 NPA is bordered to the north by the 209/350 NPA overlay, to the east by the 760/442 NPA overlay, to the south by the 661 NPA, and to the west by the 831 and 805/820 NPAs.

REVIEW OF RELIEF PLANNING ALTERNATIVES

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 559 NPA. Customers would retain their current telephone numbers; however, eleven-digit or 1+10 digit local dialing (1+NPA+XXX+XXXX) by all customers within and between NPAs in the affected area would be required. CO codes in the new overlay NPA will be assigned upon request with

the effective date of the new NPA and only after all assignable CO codes in the 559 NPA have been allocated. The projected life of this alternative would be 36 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 559 NPA would be divided into two geographic areas. A new area code would be assigned to either Area A or Area B. NANPA does not make a recommendation for either Area A or Area B to retain the 559 NPA. Within each NPA, seven-digit local dialing would be permitted, but 1+10 digit dialing will be required between the 559 and the new NPA. The proposed split boundary is shown in the Alternative #2 split map. The projected life of the two geographic areas after the split would be:

<u>AREA A</u>	<u>AREA B</u>
Total CO Codes = 380	Total CO Codes = 358
Total Rate Centers = 23	Total Rate Centers = 36
Area code life in years = 40	Area code life in years = 35

CONSENSUS ON RELIEF ALTERNATIVE

There was substantial discussion on the relief alternative to be recommended to the Commission and the Industry reviewed a list of pros and cons for both relief alternatives. A proposal was made, and consensus was reached among the participating Industry members to recommend Alternative #1, the All-Services Distributed Overlay. The all-services distributed overlay will be included in the application as the Industry's recommended method of relief filed with the Commission.

Listed below are the pros and cons the Industry reached consensus on for each relief alternative. These pros and cons helped assist the Industry to reach consensus on the method of relief to be recommended to the Commission.

Alternative #1 All-Services Distributed Overlay

Pros:

1	All existing customers would retain the 559 area code and would not have to change their telephone number.
2	Does not discriminate against customers on different sides of a boundary line as does a geographic split.
3	Less customer confusion and easier education process.
4	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
6	No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split.
7	Minimizes call routing issues, especially with ported numbers.
8	Easier for service providers to implement from a translations, billing and service order system perspective.
9	Minimal data entries handled in national databases such as BIRRDs, LERG and the

	Terminating Point Master Table.
10	The Commission would not have to decide which side retains the 559 NPA as would be required for an NPA split.
11	Does not split cities, counties or communities of interest into different area codes.
12	Does not impact some wireless carriers that have to reprogram handsets manually as would be required for an NPA split.
13	No technical impacts to number portability, text messaging or multimedia messaging.
14	An all-services distributed overlay is simpler to implement from both a technical and customer education perspective.
15	Helps move customers toward nationwide 10-digit dialing.
16	Transitioning to 10-digit local dialing will enable central office codes protected for 7-digit routes to be released for assignment.

Cons:

1	Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 559 NPA and the new overlay NPA.
2	Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
3	Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.).

Alternative #2 Geographic Split

Pros:

1	Maintains seven-digit dialing for local calls within the same NPA.
2	Approximately half of the customers would not experience a change if they keep the 559 NPA.
3	Projected lives are balanced.

Cons:

1	Requires approximately half of 559 NPA customers to change their area code.
2	Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers.
3	All 559 NPA customers previously went through a split 24 years ago and half will have to change their area code again.
4	Difficult Commission decision on which side retains the 559 NPA.
5	Longer time period needed for service providers to implement this type of relief.
6	Customers whose numbers change must contact friends, family and business associates with the telephone number changes.
7	More complicated and costly to implement for service providers in their billing, translations and database systems.
8	Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.

9	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
10	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
11	Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
12	Split requires significant challenges to service provider's operational support systems and network elements.
13	Splits cause customer confusion with caller ID during implementation.
14	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
15	Splits require the 559 NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
16	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
17	Splits require the 800/SMS database to be updated.
18	Splits reduce the geographic area served by one area code.
19	Splits the city(s), counties or legislative districts into different area codes.
20	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the 559 area code during permissive dialing. This may interrupt a customer's ability to receive two-factor authentication notifications.
21	The last split implemented was in 2007. There is additional complexity to implement a split now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

A recommendation was made, and consensus was reached to include the following dialing plan as the dialing plan that will be applied to the 559 NPA with the implementation of the all-services distributed overlay.

Type of call	Call terminating to	Dialing plan
Local	Home NPA (HNPA) or Foreign NPA (FNPA)	1 + 10-digits (1 + 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)

*10 digit permissible at wireless providers' discretion

A recommendation was made, and consensus was reached to recommend to the Commission a 13-month schedule for implementation of the overlay with the new NPA becoming effective 6-months prior to the forecasted exhaust date. The meeting participants also reached consensus to recommend that CO codes will not be assigned in the new overlay NPA until all available codes in the 559 NPA have been assigned. The recommended schedule is as follows:

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

* CO codes in the new NPA will not be assigned until all available codes in the 559 NPA have been exhausted.

STATEMENT FOR THE RECORD

The following *California 559 Area Code Relief Industry Statement for the Record and Recommended Public Education Plan for the California 559 Overlay Implementation* was provided to NANPA prior to the meeting. NANPA displayed the document for the participants to review. After some discussion, the participating Industry members reached consensus to include this document in the minutes and have it included as Attachment #1 to the Application for relief filed with the Commission.

California 559 Area Code Relief Industry Statement for the Record and Recommended Public Education Plan for the California 559 Overlay Implementation

The Industry respectfully requests that the CPUC approve the industry's application to implement an all-services distributed overlay for relief of the 559 area code, including the proposed implementation interval and the attached proposed Public Education Plan (PEP), no later than September 30, 2023. The Industry's proposed schedule and PEP 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. As it has for each of the 14 overlays implemented in California over the last 16+ years, the Industry will work together to ensure the 559 overlay implementation is successful, and will establish a PEP Task Force to coordinate consistent customer education messaging across service providers.

The last overlay implemented in California where mandatory 1+10-digit dialing was introduced was the California 909/840 overlay that was completed in February 2021. Since then, the Industry has implemented mandatory 1+10-digit dialing in nine other area codes in California, due to the federal mandate to implement the 988 abbreviated dialing code to reach the national 988 Suicide and Crisis Lifeline.¹ In implementing mandatory 1+10-digit dialing successfully in those nine other California area codes, the Industry followed the industry-developed milestones list.² Importantly, this industry-developed milestones list did not include any paid advertising.

¹ See <https://www.fcc.gov/988-suicide-and-crisis-lifeline> and NANPA Planning Letter 556 available at https://www.nationalnanpa.com/pdf/PL_556.pdf.

² See Industry Milestones List available on the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/docs/Milestones_10DDfor988_07072022.xlsx.

No paid advertising is necessary for a successful implementation of an overlay to relieve the 559 area code because:

- Californians are already very familiar with multiple area codes and mandatory 1+10-digit dialing. Mandatory 1+10-digit dialing is the predominant dialing plan in California, required in 35 of 38 area codes (92%) once the 707/369 overlay is implemented on February 1, 2023.
- The Industry is quite experienced in educating customers about mandatory 10-digit dialing (or 1+10-digit dialing where required), having implemented 35 overlays in 25 other states (including the District of Columbia) across the country over the last 10 years.³ No paid advertising was used in those 35 overlays.
- The use of news releases, particularly when issued by the CPUC, has been effective in educating the public about the overlay and supplementing individual service provider customer education notices.
- 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.
- Educating 559 customers about mandatory 1+10-digit dialing is a familiar exercise for the Industry. For routine customer education messaging about mandatory 1+10-digit dialing, paid advertising and a funded PEP doesn't make fiscal sense.

The recommended attached PEP is a combination of the PEP for the CA 909/840 overlay, the Industry milestones used to educate customers about mandatory 10-digit dialing due to the 988 mandate, and the PEPs for the 209/350 and 707/369 overlays. The recommended PEP removes any paid advertising requirements and limits the special outreach requirements to include only the necessary groups that might require such special notifications. Specifically, there's no need for special outreach to the following community-based organizations because they will be educated by their respective service providers: senior, consumer and other advocacy/activist organizations; and chambers of commerce, city councils, and other key government agencies.

³ Approximately 44 overlays have been implemented across 25 states and the District of Columbia in the last 10 years; See NANPA's *Area Codes Introduced Over The Past Ten Years* report, available at <https://www.nationalnanpa.com/enas/npasOverLast10YearsReport.do>. Of those, 35 were initial overlays where mandatory 10-digit dialing education was needed, and 9 were additional overlays where mandatory 10-digit dialing was already in place.

**Recommended Public Education Plan (PEP)
for the 559 All-Services Distributed Overlay
Thirteen-Month Implementation Plan**

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date
1	Effective date of decision approving an area code overlay for relief of the existing 559 area code.	N/A	N/A	Date of Decision (DOD)
2	Issue News Release No. 1 within the 559 area code region announcing the overlay area code relief plan and its geographic boundaries, the new overlay area code, key implementation dates, the dialing change, and how customers should prepare for the overlay. Utilize the CPUC's media list and local government contacts, and post the CPUC news release to CPUC website and social media platforms.	All customers	CPUC	Within one week of DOD
3	NANPA 559 overlay implementation meeting, and request for industry participation on Public Education Plan (PEP) task force. Determination of Implementation Start Date (ISD).	CPUC staff and industry	Shared	6 weeks after DOD
4	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	1 month after ISD
5	Email targeted letters with the information in the Customer Notification No. 1, to (1) public safety organizations and PSAPs, (2) the California alarm provider association, (3) the telephone directory publishers association, (4) the coin-operated pay telephone provider association, and (5) California Relay Services throughout	Public safety organizations and PSAPs, alarm providers, telephone directory publishers, coin-operated pay telephone	Shared	2 months after ISD

	the 559 area code region. Request that these organizations distribute the information to their members.	providers, and California Relay Services		
6	Overlay information distributed internally as a job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual	3 months after ISD
7	559 overlay update to industry websites.	All customers	Individual	3 months after ISD
8	Issue News Release No. 2 within the 559 area code region, describing the 559 area code overlay plan and its geographic boundaries, the 1+10-digit dialing requirement, the remaining key implementation dates, and how customers should prepare for the overlay. Utilize the CPUC's media list and local government contacts, and post the news release to the CPUC website and social media platforms.	All customers	Shared and CPUC	4.5 months after ISD
9	Correct payphone signage to include updated dialing instructions	Customers that use payphones	Individual	5 months after ISD
10	Provide to CPUC Communications Division second email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	5.5 months after ISD
11	Issue Customer Notification No. 1 to customers with 559 telephone numbers: Announce the new 559 area code overlay plan, including information about 1+10-digit dialing and indicate the affected geographic area, the key implementation dates, and how customers should prepare for the overlay.	All customers	Individual	6 months from ISD
12	Begin Permissive 7- or 1+10-Digit Dialing			6 months from ISD

13	Email reminder targeted letters with the information in the Customer Notification No. 2, to (1) public safety organizations and PSAPs, (2) the California alarm provider association, (3) the telephone directory publishers association, (4) the coin-operated pay telephone provider association, and (5) California Relay Services throughout the 559 area code region. Request that these organizations distribute the information to their members.	Public safety organizations and PSAPs, alarm providers, telephone directory publishers, coin-operated pay telephone providers, and California Relay Services	Shared	11 months from ISD
14	Issue News Release No. 3 reminding the public of the 559 overlay area code relief plan, the overlay area code geographic boundaries, and the new overlay area code for issue within the 559 area code overlay region. Post CPUC news release to CPUC website and social media platforms.	All customers	Shared and CPUC	11.5 months after ISD
15	Issue Customer Notification No. 2 to customers with 559 telephone numbers: Announce the new area code plan, include information about mandatory 1 + 10 digit dialing, and indicate the affected geographic area, the remaining key implementation dates, and how customers should prepare for the overlay.	All customers	Individual	12 months from ISD
16	Complete implementation of recorded message announcing mandatory dialing	All customers	Individual	12 months from ISD
17	Begin Mandatory 1+10-Digit Dialing (1 month before the new NPA's effective date)			12 months from ISD
18	Provide to CPUC Communications Division third email or written confirmation from the California Telecommunications Industry identifying media coverage (including local broadcast television stations) of the 559 area code overlay.	CPUC staff	Shared	12.5 months after ISD
19	Published Directories: Add information on cover to alert customers in 559 overlay area about the new overlay area code	All customers	Individual	13 months after ISD

20	New NPA/Area Code effective and implementation completed (1 month after mandatory dialing)			13 months from ISD
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CUSTOMER EDUCATION PLAN

There was discussion regarding any additional items to be included in the application and consensus was reached that the customer education milestones are included in the Industry's *Recommended Public Education Plan (PEP) for the 559 All-Services Distributed Overlay Thirteen-Month Implementation Plan*. Additionally, consensus was reached to include the following technical milestones that will be utilized by the Industry for implementation of an initial all-services distributed overlay.

Customer Education Milestones:

To review the customer education milestones, see the Industry's *Recommended Public Education Plan (PEP) for the 559 All-Services Distributed Overlay Thirteen-Month Implementation Plan* which is included above under "Statement for the Record" and will also be included as Attachment #1 to the application for relief filed with the Commission.

Technical Milestones:

	Responsibility
1 Obtain industry test code from NANPA and activate the test number	One Service Provider volunteer
2 Open the test code in carriers' network	All Service Providers
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.)	All Service Providers
4 Ensure Highway boxes are programmed with 10-digit dialing	Co-chairs of industry committee
5 Network ready for Permissive Dialing	All Service Providers
6 Create Permissive Dialing Industry Contact List	Co-chairs of industry committee
<u>Permissive Dialing Begins</u>	
7 Establish NPA Specific type of Trunks	All Service Providers (as needed)
8 Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit	All Service Providers

dialing	
11 Recorded announcements in Place and Tested	All Service Providers
<u>E911 Work Plan</u>	
12 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13 Ensure SRDB table has new NPA built	E911 Providers
14 Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
16 Update PSAP equipment to recognize new NPA	PSAPs
17 Trunk Orders Complete	All Service Providers (as needed)
18 Build E911 Network/Tandem Translations	E911 Providers
19 Verify if all PSAP work has been completed	E911 Providers
20 Activate E911 Network/Tandem Translations	E911 Providers

The above are the typical milestones necessary for implementation of an initial all-services distributed overlay; however, these may need to be modified during the actual implementation.

STATE STATUTE REQUIREMENTS

Heidi stated the California Public Utilities Code, Section 7931, has certain notification requirements:

-NANPA is to formally notify the Commission 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 affected customers in writing of the need to establish a new area code and;

-**Within 9 months of that notice to the Commission** 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 Commission requesting approval to implement a plan.

Heidi informed the participants that a notification will be sent by NANPA to the Commission notifying them of the need for a new area code to relieve the 559 NPA. The notification to the Commission will be posted via the NANP Notification System (“NNS”). In lieu of public meetings, the Commission staff and NANPA will be recording a webcast which will be posted to the Commission website. Within three months of this notice being sent to the Commission, all service provider OCNs with assigned CO codes or thousands-blocks must inform all affected customers of the need for a new area code and the webcast. The customer notice verbiage will be

drafted and approved by the Commission staff and sent out via NNS as well as emailed to all service provider OCNs in the 559 NPA. Heidi reminded the participants to keep their NAS user profiles active to ensure they are receiving NNS notifications.

OPEN DISCUSSION

There were no additional questions raised.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Participants reached consensus that NANPA will file the application for relief of the 559 NPA which will inform the Commission of the outcome of this relief planning meeting. The application is to be filed with the Commission within 6 weeks of the initial relief planning meeting, or no later than February 1, 2023, pursuant to the Guidelines unless otherwise decided by the Industry.

MEETING MINUTES DISTRIBUTION AND APPROVAL OF THE MINUTES

There was no objection to forgoing a meeting to approve the draft minutes. The draft minutes resulting from this meeting will be distributed to the Industry by posting them on the NANPA website no later than January 6, 2023. The Industry is to provide any suggested edits to Heidi Wayman via email at hwayman@nanpa.com. Any changes to the minutes should be provided no later than January 13, 2022, when the minutes will become final.

Heidi reviewed the schedule of remaining events that will be completed for the 559 NPA.

CA 559 NPA Relief Planning Meeting & Draft Application Schedule

January 6, 2023 – Post Draft Meeting Minutes via NNS

January 11, 2023 – Post Draft Application via NNS

January 13, 2023 – Post Final Meeting Minutes via NNS

January 18, 2023 – Draft Application Review Meeting @ 12:30 PM PT

February 1, 2023 – File Application with the Commission

NANPA Meeting Adjourned

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These minutes became final on January 13, 2023.

**California 559 NPA
Initial Relief Planning Meeting
December 21, 2022
Participants**

NAME	COMPANY
Jeanne Bell	Allstream
Deborah Anstead	Altice USA
Sharon Poer	AT&T
Joanne Leung	California Public Utilities Commission
Dan Bowlin	DISH Wireless
Rita Schmitz	Lumen/CenturyLink
Heidi Wayman	NANPA
Cecilia McCabe	NANPA
Linda Hymans	NANPA
Morgan Shield	Sierra Telephone
Erin Miller	Sierra Telephone
Shaunna Forshee	T-Mobile
Karen Riepenkroger	T-Mobile
Chanda Brown	Verizon
Laura Dalton	Verizon
Dana Crandall	Verizon Wireless
Scott Terry	Windstream

California Central Office Code Summary						
NPA	559					
Assigned NXXs	721					
Reserved NXXs	0					
Unavailable NXXs	20					
Available NXXs	59					
Total	800					
Code Assignment History	2017	2018	2019	2020	2021	2022
	6	2	6	13	33	18*
*As of December 20, 2022						
October 2022 NRUF and NPA Exhaust Analysis	3Q2025					
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).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	CA 559
MEETING DATE:	12/21/22
RATE CENTERS	
# Total	59
# Mandatory	31
# Mandatory-Single Service Providers (M*)	7
# Optional	19
# Excluded	2
BLOCKS ASSIGNED	
# Total	329
<i>(For time period 12/01/21- 12/20/22)</i>	
BLOCKS AVAILABLE	
#Total	316
<i>(As of preparation date: 12/20/22)</i>	
CODES ASSIGNED	
# Total	24
# for Pool Replenishment	22
# for Dedicated Customers	0
# for LRNs	2
<i>(For time period 12/01/21- 12/20/22)</i>	
CODES FORECASTED	
# Total	8
# for Pool Replenishment and Dedicated Customers	8
# for LRNs	0
<i>(For the next twelve months as of: 12/20/22)</i>	