



# MIKE DEWINE

★ OHIO ATTORNEY GENERAL ★

Public Utilities Section

Office 614.466.4395

Fax 614.644.8764

180 East Broad Street, 6th Floor

Columbus, OH 43215-3793

www.ohioattorneygeneral.gov

March 18, 2013

Case No. 13-699-TP-COI

John Manning  
Director, North American Numbering Plan Administration  
21575 Ridgetop Circle  
Sterling, VA 20166

RE: Notification regarding NPA oversight authority

Dear Mr. Manning:

Pursuant to our attached letter of February 5, 1998, the Public Utilities Commission of Ohio (PUCO) previously expressed its desire to retain its full area code (NPA) relief planning oversight authority. At this time, the Commission requests that the North American Numbering Plan Administrator (NANPA) take over primary responsibility for NPA relief planning on a going forward basis. As part of this request, the PUCO intends for NANPA to begin to apply, where possible except as discussed below, its current three-year in advance of exhaust criteria for the purpose of commencing area code relief on a going forward basis.

The PUCO is aware that the most recent forecasts reflect that the "440" NPA will exhaust in the 2<sup>nd</sup> quarter 2014, the "614" NPA will exhaust in the 4<sup>th</sup> quarter 2014, the "740" NPA will exhaust in the 2<sup>nd</sup> quarter 2015, and the "513" NPA will exhaust in the 1st quarter 2018. Therefore, projected exhaust dates for the "440", "614", and "740" NPAs are already inside of the three-year industry standard window utilized by NANPA. The PUCO recognizes that as a result of NANPA taking over NPA relief planning, the "440", "614", and "740" NPAs will immediately be deemed to be in jeopardy status under this three-year industry standard window. The PUCO requests that, in conducting relief planning for the "440", "614", and "740" NPAs, NANPA utilize the two-year relief planning guidelines used by the PUCO in prior relief planning circumstances. The PUCO recognizes that, even utilizing a two-year to exhaust standard, the "440" and "614" NPAs will be considered in jeopardy status.

Regarding the "513" NPA, I would point out that the Commission, pursuant to its Opinion and Order of September 28, 2000, as amended by its Entry of June 21, 2001, in Case No. 99-668-TP-COI, *In the Matter of the Commission's Investigation Into Exhaust Relief for Area Code "513"*, previously determined that an all services overlay plan should be implemented in order to provide long term area code relief. Permissive ten and eleven-digit dialing began on January 15, 2001. Mandatory ten-digit dialing was to begin on June 29, 2002; however, on March 14, 2002, the Commission issued an entry indefinitely suspending the rollout

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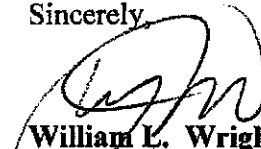
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PUCO

of the "283" NPA and the corresponding commencement of mandatory ten-digit local dialing due to the then decrease in the rate at which additional codes were being requested in the "513" NPA.

Regarding the "614" NPA, I would point out that the Commission, pursuant to its Opinion and Order of May 17, 2001, in Case No. 00-1260-TP-COI, *In the Matter of the Commission's Investigation Into Exhaust Relief for Area Code "614"*, previously determined that an all services overlay plan should be implemented in order to provide long term area code relief. Permissive ten-digit dialing began on August 18, 2001. Mandatory ten-digit dialing was to begin on September 21, 2002; however, on March 14, 2002, the Commission issued an entry indefinitely suspending the rollout of the "380" NPA and the corresponding commencement of mandatory ten-digit local dialing due to the then decrease in the rate at which additional codes were being requested in the "614" NPA.

Should you have any questions or should it be necessary for the PUCO to supply you with further details regarding this notification, please contact Marianne Townsend at 614-728-2855.

Sincerely,



**William L. Wright**  
Attorney for the Public Utilities  
Commission of Ohio

Phone: (614) 466-4397  
Fax: (614) 644-8764  
[William.wright@puc.state.oh.us](mailto:William.wright@puc.state.oh.us)

180 E. Broad St., 6<sup>th</sup> Floor  
Columbus, OH 43215-3793  
[www.ohioattorneygeneral.gov](http://www.ohioattorneygeneral.gov)

WLW/tys

cc: Marilyn Jones, Federal Communications Commission  
Gary Remondino, Federal Communications Commission  
Brent Struthers, Neustar

Enc.



Attorney General  
Betty D. Montgomery

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February 5, 1998

PUCO

Ronald R. Conners  
Director, North American Numbering  
Plan Administration  
Communications Industry Services  
Lockheed - Martin IMS  
1200 K Street, NW  
Washington, DC 20005

RE: Notification of intent to  
retain NPA oversight authority

97-884-TP-001

Dear Mr. Conners:

By this letter, pursuant to the Federal Communications Commission's Second Report & Order in CC Docket No. 96-98, the Public Utilities Commission of Ohio (PUCO) makes it notification that it intends to retain its full NPA relief planning oversight authority, at this time. It is our expectation that once Lockheed-Martin has completed the transition to NPA and CO code administrator, Ohio would work in collaboration with Lockheed-Martin to assure timely and appropriate NPA relief when necessary.

We have reviewed the attached list of 26 activities associated with relief planning developed by Jim Deak, an NANPA Regional NPA coordinator. The PUCO is in general agreement that these activities are necessary. We also agree that this list is not necessarily a list inclusive of all necessary activities. Generally, the PUCO believes that activities 1, 2, 15, 16, 21-23, and 26, are activities that must be performed by the CO code administrator in addition to any related activities performed by the state. Activities 3 - 6, and 8 - 14, are, generally, activities that Ohio intends to perform in the context of NPA relief planning. Finally, activities 7, 17-20, 24, and 25 are activities that will generally, need to be jointly coordinated between the NANPA and the PUCO.

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The PUCO notes its concern that annual COCUS projections do not seem to adequately project exhaust. The PUCO currently has a statewide generic docket open investigating the issues of numbering and number administration in Ohio. We are receiving comments on a proposed process of number administration and area code relief plan implementation in Ohio.

Should you have any questions, or should it be necessary for the PUCO to supply you with further details regarding our notification of intent to retain NPA oversight authority, please contact me at 614-644-8599. Thank you for your consideration in this matter.

Sincerely,

Betty D. Montgomery  
Attorney General

Duane W. Luckey  
(Chief - Public Utilities)



Jodi J. Bair  
Assistant Attorney General  
Public Utilities Section  
180 E. Broad Street/ 7th Floor  
Columbus, Ohio 43215-3793  
614-466-4395  
Fax: 614-644-8764

JJB/hc

Enc.

cc: Marian Gordon, Federal Communications Commission  
James Ramsay, Assistant General Counsel, NARUC