

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investiga-)
tion Into Exhaust Relief for Area Code "740.") Case No. 13-700-TP-COI

OPINION AND ORDER

I. BACKGROUND:

A. History

In its November 5, 1998, Finding and Order in Case No. 97-884-TP-COI (97-884), *In the Matter of the Commission's Investigation into Numbering and Number Assignment Procedures*, the Commission established new policies and procedures regarding area code exhaust and the planning of relief for such future exhausts. In addition, the Commission, in its 97-884 Finding and Order, described the history of area codes and the technical criteria related to telephone numbering in North America. A summary of this history is described below.

Telephone numbering for all of North America is designed and administered according to the North American Numbering Plan (NANP). The NANP outlines the procedures and protocols for the assignment of central office codes (NXXs) and area codes or numbering plan areas (NPAs). The NANP is administered by the North American Numbering Plan Administrator (NANPA), Neustar, Inc. (Neustar), and ultimately by the Federal Communications Commission (FCC). The NANPA is the federal body responsible for administering area codes and projecting area code exhausts.

An area code is the initial three-digit prefix of a telephone number that identifies the first level of the call routing information. Historically, an area code had to begin with any digit 2-9, have a 1 or 0 for the middle digit, and end with any digit 0-9. Until the 1990s, the phrase "area code exhaust" was nearly nonexistent. Area codes were first introduced over 66 years ago. In the rare event when area code exhaust did occur, there were plenty of area codes remaining to distribute. However, the unimagined boom in telecommunications services that require telephone numbers has drastically altered the future of area codes and indeed even the NANP itself. The increase in second lines, pagers, facsimile machines, cellular telephones, and computer modems resulted in an exponential growth in the demand for telephone numbers.

In 1996, the NANP was altered to allow NPAs to begin with any digit 2-9, have any digit 0-9 in the middle, and end with any digit 0-9. This greatly increased the number of available area codes and added life to the NANP. However, in the past number of years the introduction of local telephone competition and the continued exponential growth in

telecommunications services requiring telephone numbers, such as point-of-sale terminals, ATMs, and Internet services, has continued to drain the numbering resources at an alarming rate.

An area code has a potential for approximately 8,000,000 assignable telephone numbers. Each area code has approximately 800 assignable NXXs in it. The first six digits of the number (or the NPA-NXX) identify the exact switch to which a call must be terminated. Originally, telephone numbers were required to be assigned on a NXX basis (blocks of 10,000 telephone numbers). Number pooling, introduced in the "740" NPA in December 2002, allows for the assignment of telephone numbers in blocks of 1,000 numbers (i.e., on a NXX-X basis). While number pooling has helped curtail area code exhaust, the demand for telephone numbers has continued, resulting in the current need for relief in the "740" NPA.

B. Discussion of Area Code Relief Procedures Established in 97-884

The policies and procedures established in 97-884 were issued pursuant to the FCC's delegation of authority to the states for the purpose of resolving matters involving the implementation of new area codes, including the consideration of both geographic split and overlay options. Each state's implementation method is subject to the FCC's guidelines for numbering administration. See *In the Matter of the Implementation of Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Second Report and Order (FCC 96-333) (August 8, 1996) at ¶269 (hereafter, *Local Competition Second Report and Order*).

In its Finding and Order in 97-884, the Commission determined that a Commission-ordered investigation into the relief of a particular area code should be commenced in advance of the projected exhaust for that particular code. A final order adopting a relief plan should be issued no later than six months after the date that the proposed plan(s) is filed with the Commission. Pursuant to this time frame, a minimum six-month permissive dialing period, if necessary, should be accomplished.

Pursuant to its letter of February 5, 1998, docketed in 97-884, the Commission notified the NANPA that it intended to retain its full area code (NPA) relief planning oversight authority. In accordance with its letter of March 18, 2013, docketed in this case, the Commission requested that the NANPA take over primary responsibility for NPA relief planning on a going forward basis. Notwithstanding this request, the Commission, consistent with 47 C.F.R. 52.19, continues to maintain authority to review and approve NPA relief plans.

C. National Area Code Guidelines

While the procedures established by the Commission in 97-884 are primarily based on geographic and community-related concerns, the applicable national guidelines (e.g., NPA Code Relief Planning and Notification Guidelines [National Guidelines], September 30, 2013) focus on the existing telephone network and telephone exchange boundaries, as well as the desire to maintain balance between the existing and newly established area codes. The national guidelines attempt to promote effective and efficient code utilization in order to help ensure the adequate supply of telephone numbers in an area code and the balancing of NXXs between two area codes, while taking into account future growth, customer confusion, and the balancing of the cost of implementation to all affected parties. Specifically, NPA Guideline 5.0, requires that selected plans should result in all area codes in a given area exhausting at approximately the same time and that severe exhaust imbalances of more than 10 years should be avoided. In addition, NPA Guideline 5.0 recommends that customers who undergo an area code change should not be required to incur a change for a period of 8-10 years. Further, all relief plans should cover a period of at least five years beyond the predicted date of exhaust. The FCC has also established that numbering administration should: (1) seek to facilitate entry into the communications marketplace by making numbering resources available on an efficient and timely basis; (2) not unduly favor or disadvantage any particular industry segment or group of consumers; and (3) not unduly favor one technology over another. *See Local Competition Second Report and Order* at ¶278.

D. Additional Ohio Authority

In issuing its area code relief planning procedures in 97-884, the Commission noted that its proposed treatment was premised on the belief that certain forecasting activities would be successfully pursued on the federal level. The Commission specifically stated that, “[I]n the event that such activities do not occur, the Commission reserves the right to readdress these issues in the manner it deems necessary.” *See 97-884 Finding and Order* (November 5, 1998) at 19. The Commission also called attention to the fact that area code relief must be considered closely and in conjunction with the issues of number administration and utilization. *See 97-884 Finding and Order* (November 5, 1998) at 20.

Based on premature NPA exhausts in the state of Ohio, the Commission, on September 10, 1999, submitted an emergency petition for additional delegated authority to implement number conservation measures to the FCC in CC Docket No. 96-98, *In the Matter of the Petition of the Ohio Public Utilities Commission for Delegation of Additional Authority to Implement Number Conservation Measures*. The Commission emphasized that the requested tools must be made immediately available in order to provide any hope of forestalling the existing area code exhausts.

On November 30, 1999, the FCC adopted an order that conditionally granted the Commission the authority to set NXX code allocation standards; reclaim unused and reserved NXX codes and thousand-number blocks within codes where pooling was implemented; investigate and order the return of reserved and protected NXX codes; require sequential number assignment; and institute thousand-number block pooling trials. The FCC denied the Commission's request for the authority to adopt number rationing plans prior to reaching an area code relief decision, for the authority to implement service-specific and technology-specific overlays, and for authority to require carriers to assign numbers from NXX codes to end users within six months of assignment of an NXX code.

On March 31, 2000, the FCC issued its Report and Order in CC Docket No. 99-200, *In the Matter of Numbering Resource Optimization* (hereafter *Numbering Resource Optimization First Report and Order*). The *Numbering Resource Optimization First Report and Order* was intended to create national standards to address numbering resource optimization. Although the *Numbering Resource Optimization First Report and Order* continued Ohio's authority over NPA relief measures, it eliminated Ohio's previously granted authority for several important conservation measures such as independent data collection and sequential number assignment.

In its December 2001, Third Report and Order and Second Order on Reconsideration (*Numbering Resource Optimization Third Report and Order*), in CC Docket No. 99-200, *In the Matter of Numbering Resource Optimization*, 17 FCC Rcd 252, the FCC considered the potential adverse impact of service-specific and technology-specific overlays. In a service-specific overlay, numbering resources are assigned to carriers that provide a particular type of service or services, such as unified messaging and/or vehicle response services. In a technology-specific overlay, numbering resources are assigned to carriers that use a particular type of technology or technologies, such as wireless. In both service-specific and technology-specific overlays, the requesting service providers would not be assigned telephone numbers in the underlying NPA but, instead, would be assigned numbers from a different NPA.

In its *Numbering Resource Optimization Third Report and Order*, the FCC determined that, while in some instances service-specific and technology-specific overlays may place affected providers at a competitive disadvantage, the technologies may significantly contribute to numbering resource optimization by prolonging the life of the underlying area code, and thereby ease the cost and inconvenience of frequent area code relief. See *Numbering Resource Optimization Third Report and Order*, 17 FCC Rcd at 287. In order to minimize the potential discriminatory effects associated with service-specific and technology-specific overlays, the FCC set forth criteria designed to provide guidance to states as to the types of service-specific and technology-specific overlays that might be

approved. See *Numbering Resource Optimization* Third Report and Order, 17 FCC Rcd at 288.

II. RELIEF PLANNING ACTIVITIES:

In its role of taking primary responsibility for NPA relief planning as the NANPA, Neustar, on March 13, 2013, notified the telecommunications industry, comprised of current and prospective telecommunications carriers operating in or considering operations within the "740" NPA in Ohio, that NPA relief is needed to be addressed. On April 1, 2013, the NANPA distributed relief planning materials to the industry, including proposed NPA relief alternatives for consideration. On May 1, 2013, Neustar facilitated a telecommunications industry conference call to discuss the proposed relief alternatives and to allow the Ohio telecommunications industry to arrive at a consensus on the relief alternative to be recommended to the Commission. The two proposed NPA relief alternatives identified by Neustar consist of an all-services distributed overlay and a geographic split. Both proposed remedy alternatives satisfy the NPA Relief Planning Guidelines criteria regarding longevity including the required balance of anticipated longevity of both NPAs resulting from the implementation of the geographic split.

On September 24, 2013, Neustar, in its role as the NANPA, filed a petition on behalf of the Ohio telecommunications industry for relief of the "740" NPA. In conjunction with the petition, a motion was filed seeking authority for Kimberly Wheeler Miller to appear pro hac vice in this proceeding pursuant to Rule XII, Section 2(A)(6) of the Supreme Court Rules for the Government of the Bar of the Ohio. A revised motion was filed on November 27, 2013. The motion is reasonable and should be granted for the limited purpose of this proceeding.

In its application, Neustar notes that, according to the April 2013 Number Resource Utilization Forecast and NPA Exhaust Analysis published by the NANPA, absent NPA relief, the supply of NXXs in the "740" NPA will exhaust during the second quarter of 2015. The petition reflects that, during its conference call of May 1, 2013, the Ohio telecommunications industry reached consensus to recommend the all-services distributed overlay plan to the Commission as the preferred method of relief for the "740" NPA.

Pursuant to its Entry of November 6, 2013, the Commission invited any interested person to file comments relative to the all-services distributed overlay plan and the geographic split plan addressed in the Neustar petition. A link to a survey and informational materials was provided in the entry. The opportunity for public input was promoted on the Commission's homepage and through a Commission press release. A copy of this entry was served on the president of the county commission in each of the 40 counties in the "740" NPA. Additionally, a copy was served on the affected regional

planning commissions/councils, the Ohio Township Association, and the Ohio Municipal League.

III. DESCRIPTION OF PROPOSED PLANS:

In its petition, Neustar presented one geographic split plan and one overlay plan. Each of the plans is described below. Neustar represents that, based on the positives and negatives delineated below, the industry reached a consensus to recommend the all-services distributed overlay as the preferred method of relief for the "740" NPA.

A. All-Services Distributed Overlay

The overlay plan allows the existing "740" NPA to remain intact and all existing customers to retain the "740" NPA and not have to change their telephone numbers. The second area code, when added, would exist within the same geographic area as the existing "740" NPA boundaries and would encompass 187 rate centers constituting 720 central office codes. Upon exhaustion of the "740" NPA, new telephone lines would be assigned to a new area code beginning one month after mandatory dialing. As a result of the overlay, ten-digit dialing would be required for all local calls, including those within the "740" NPA, those within the new area code, and those between the area codes. Neustar projects that the overlay will have a life of 52 years. As noted in the petition, benefits associated with the all services distributed overlay include the following:

- (1) Does not discriminate against customers on different sides of a boundary as would a geographic split;
- (2) Keeps communities of interest intact and does not split cities or counties into different area codes;
- (3) Avoids having to decide which side of an NPA boundary is assigned the new NPA;
- (4) Less customer confusion and an easier education process;
- (5) Less financial impact to business customers because there is no need to change signage, advertising, and stationary unless they currently only show seven-digit numbers;
- (6) Residential customers do not have to update personal printed material such as checks and websites, unless they currently only show seven-digit numbers;

- (7) Allows for the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth;
- (8) Easier for service providers to implement from a translations, database, billing, and service order system perspective.

Regarding the negatives of the overlay plan, Neustar noted that it would require ten-digit dialing for all local calls within and between the "740" NPA and the new NPA. Additionally, customers would have to reprogram any autodialing equipment currently programmed to dial seven digits to dial ten-digits. This equipment includes alarm systems, Public Safety Answering Points, security gates, Private Branch Exchanges, life safety systems, computer modems, voice systems, fax machines etc.

B. Geographic Split

The proposed geographic split would divide the existing "740" NPA into two geographic areas and a new NPA would be assigned to one of the areas formed by the split. The proposed split boundary line runs north-to-south along rate center boundaries where Danville, Hanover, Logan, Oak Hill, and Portsmouth are some of the rate centers west of the boundary line (Area "A") and Warsaw, Zanesville, McConnelsville, Albany, Walnut, and Ironton are among the rate centers east of the boundary line (Area "B"). Area "A" would have 85 rate centers assigned to it with a total of 372 central office codes. The estimated life expectancy would be 48 years. Area "B" would have 102 rate centers assigned to it with a total of 348 total central office codes. The estimated life expectancy would be 56 years. The petition does not recommend whether Area "A" or Area "B" should retain the "740" NPA.

No specific benefits were identified in the filed petition for the split alternative. According to the petition, the negatives associated with the split alternative include the following:

- (1) It requires approximately half of the "740" NPA customers to change their telephone numbers;
- (2) It requires approximately half of the businesses to incur costs to change their advertising and stationary due to change in the area code;
- (3) It results in cities, counties, or legislative districts being split into different area codes;
- (4) It results in the splitting of communities of interest;

- (5) It requires a more challenging customer education process for service providers that have customers on both sides of the split line;
- (6) It requires a longer time period for service providers to implement this type of relief due to technical issues, including those related to billing, translations, and database systems (e.g., E9-1-1, directory assistance, 800/SMS);
- (7) It results in technical issues for wireless providers, including the manual reprogramming of handsets in some cases;
- (8) It adversely impacts alarm systems;
- (9) It requires that the timing for the publication of telephone directories must be coordinated with the implementation of the new NPA;
- (10) It results in more customer confusion with Caller ID during implementation.

IV. PUBLIC COMMENTS:

As noted, the Commission established a process and procedure for affected customers to file comments regarding the two area code relief options being considered. The Commission received 943 electronic responses from subscribers that were filed in this docket pursuant to this process and procedure. Additionally, the Commission received two letter responses (AT&T Entities and Verizon Wireless) that were also filed in this docket in favor of the overlay option and one (Delaware County Commissioners) that was in favor of the split alternative. A review of the filings in this proceeding reflects that 663 responders expressed a preference for the overlay proposal and 280 responders expressed a preference for the split alternative. Based on the volume of responses, approximately 70 percent favor the overlay and approximately 30 percent favor the proposed split option. Many of those in favor of the overlay option indicated that it was preferable due to the fact that it will allow existing customers to retain their telephone numbers and will result in the least cost and disruption to subscribers. Many of those in favor of the split option indicated that it was preferable due to the fact that they did not want to deal with ten-digit local dialing and that they had already gone through one previous split and did not find it to be too burdensome.

V. DISCUSSION:

A. Appropriate Relief for Exhaust of Telephone Numbers in the "740" NPA

In considering the appropriate resolution for this case, the Commission must be guided by the controlling federal law and policy in this area. Section 251(e)(1) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, confers upon the FCC exclusive jurisdiction over those portions of the NANP that pertain to the United States, but authorizes the FCC to delegate to state commissions or other entities all or any portion of that jurisdiction. As stated above, the FCC has authorized states to resolve matters involving the implementation of new area codes subject to the federal guidelines for numbering administration.

The "740" NPA was established in 1997 as a result of the split option adopted as area code relief in the "614" NPA. The record in this case establishes that the "740" NPA is now anticipated to exhaust during the second quarter of the year 2015. Therefore, expeditious approval of a final plan is critical so that, at a minimum, a six-month permissive dialing period and proper (i.e., six months) consumer education may commence prior to the implementation of the selected area code relief. The need for area code relief clearly reflects the advent of more competition in the telecommunications industry, the economic growth in the state of Ohio, and ongoing technological innovation (e.g., ATM machines and debit cards). All of these are clearly aspects of development which are consistent with the state's telecommunications policy embodied in Section 4927.02, Revised Code. Unfortunately, number exhaustion is an adverse consequence of these otherwise positive developments.

Based on a review of the record in this case, the Commission finds that Neustar and the industry has complied with the procedures developed in 97-884, as modified by the Commission's request that Neustar, as the NANPA, take over primary responsibility for NPA relief planning on a going forward basis. As discussed in the petition, the planning process commenced when Neustar distributed relief planning materials to the industry on April 1, 2013, setting forth relief plan options for consideration. The industry came to a consensus decision in support of the all services distributed overlay option during its May 1, 2013 conference call.

The Commission notes that neither of the proposed area code relief plans will impact the rates for a call. All calls that are currently local will remain local and those that are toll will continue as such. However, under the proposed split plan, all local calls placed within the same area code will require dialing seven digits and all local calls placed between different area codes will require dialing ten or eleven digits. Pursuant to the overlay proposal, all local calls placed within the same area code will require dialing ten

digits and all local calls between different area codes will require dialing ten or eleven digits.

Upon reviewing the proposed plans and considering all of the 97-884 procedures and national guidelines discussed above, the Commission finds that the overlay plan is the most equitable and efficient plan proposed. In rejecting the split plan under consideration, the Commission is particularly sensitive to the fact that NPA longevity projections throughout the country have been proven to be unreliable because of the ever-changing nature of NXX demand. As evidence of this point, we have to look no further than here in the state of Ohio. The "330" NPA was originally projected to extend until the fourth quarter 2005, but ultimately required additional relief to commence in April 2000 (*See Case No. 99-669-TP-COI*). Additionally, the Commission ordered overlay relief in both the "614" and "513" NPAs (*See Case Nos. 00-1260-TP-COI and 99-668-TP-COI, respectively*), only to subsequently learn that the projected telephone number utilization rates had slowed and relief was no longer currently necessary.

Recognizing the inconvenience incurred by instituting a new area code, the Commission is interested in selecting a plan that, when considering all subscribers in the existing "740" NPA, will provide an equitable solution. Consistent with this desire, the Commission finds that the overlay plan treats all existing "740" NPA customers equally by allowing each existing customer to retain the "740" NPA on all existing lines and, as necessary, assigning the new area code to new telephone lines established in the future. Through this approach, the Commission can provide equitable NPA exhaust relief without running the risk that current "740" NPA subscribers will have to incur premature additional area code changes.

In selecting the overlay plan, the Commission acknowledges the public testimony in favor of the overlay plan in order to avoid the need for the change in existing telephone numbers. For business subscribers in particular, this will avoid the need to incur additional expenses related to advertising a new telephone number and not having to run the risk that past and existing customers will be unable to determine if the business is still in operation. Even if a current business subscriber found it necessary to add new lines and those lines had to be assigned the new area code, there is no need to change the existing published telephone numbers of the business. For example, a business may have many numbers, but only one or a few of those numbers may actually be published or advertised for customer use.

As a result of the implementation of the overlay plan, all telephone companies in the "740" NPA will have to reprogram their switches in preparation for the overlay of a new area code in the existing "740" NPA. Specifically, pursuant to the FCC's directives, mandatory ten-digit dialing for all local calls within an area code is required for areas served by overlays to ensure that competition will not be deterred as a result of dialing

disparity. See *Local Competition* Second Report and Order at ¶284. This dialing pattern will ensure that the same NXX codes will be functional within both the “740” and the overlay area code. The Commission notes that subscribers have become more familiar with dialing ten digits on a daily basis due to the continued growth of wireless devices as subscribers’ primary communications device and the frequent need to dial ten digits in order to complete calls to and from wireless telephone numbers. The Commission also notes that as result of the numerous area code relief plans that have been implemented in the state of Ohio over more than the past 15 years, local calling already often requires the dialing of 10 digits. Specially, the Commission notes that in the past four Commission area code relief cases (e.g., “330” NPA, “419” NPA, “614” NPA, and the “513” NPA) overlays were ordered; thereby requiring mandatory ten-digit local dialing.¹

A permissive dialing period for local calls should begin on September 20, 2014. During this permissive period, local calls can be completed on a seven-digit basis as well as on a ten- and eleven-digit basis as discussed infra. It is hoped that this permissive dialing period will aid in the transition from one dialing pattern to the other.

Consistent with our Entry of January 6, 2000, in 97-884 regarding interNPA local dialing patterns, all local telephone companies, excluding commercial mobile radio service (CMRS) providers,² should take appropriate steps prior to September 20, 2014, to ensure that all basic local (both flat- and measured-rate) and nonoptional flat-rate and nonoptional measured-rate extended area service calls may occur on a ten- and eleven-digit basis. Although the capability for both ten- and eleven-digit dialing is required, the Commission believes that all local telephone companies, excluding CMRS providers, should still emphasize ten-digit dialing for these types of calls. Through this requirement, the Commission hopes to continue to have subscribers associate ten-digit dialing with local calls and eleven-digit dialing for toll calls, when possible. With respect to CMRS providers, the Commission notes that, consistent with our January 6, 2000 Entry in 97-884, due to the unique manner in which CMRS providers distinguish between local and toll, they are not required to provide both permissive ten- and eleven-digit dialing for all basic local and nonoptional flat-rate and nonoptional measured-rate extended area service calls. CMRS providers are not, however, permitted to continue using seven-digit local dialing, at the end of permissive dialing.

Mandatory ten- and eleven-digit local calling will begin on March 21, 2015. The earliest possible date that NXXs may be activated in the new area code will be on April 22, 2015. In the event that Neustar modifies the projected exhaust of the “740” NPA, the Commission will consider adjusting the implementation date of the required dialing

¹ In the case of the “513” and “614” NPAs, the ordered overlays were put in abeyance due to the fact that telephone number utilization demand curtailed below the originally anticipated levels.

² For the purpose of this Opinion and Order, CMRS is specifically limited to include mobile telephone, mobile cellular telephone, personal communications service, and specialized mobile radio service.

patterns. The Commission is aware that the required change in local dialing will be the most significant impact of the overlay plan in that it will require all existing "740" NPA customers to change their local dialing patterns.

VI. CONCLUSION:

After considering the petition filed in this proceeding, the Commission concludes that the overlay plan is the more appropriate and equitable plan in order to provide the best long-term area code relief for the "740" NPA. Further, the overlay plan is supported by approximately 70 percent of those individuals responding to the Commission's request for feedback. In addition to reducing the impact of area code relief on "740" NPA communities, the overlay plan should result in more efficient number utilization in both the "740" and new NPA. The Commission recognizes that with the accelerated exhaust of NPAs, overlay plans are becoming more prevalent in the state of Ohio and across the country. The overlay plan should also result in the least amount of disruption for existing subscribers throughout the "740" NPA. Additionally, the adoption of the overlay plan will eliminate the need for wireless customers to reprogram their existing phones and pagers.

There is no question that the introduction of the new overlay area code will have an impact on business and residential subscribers, especially with respect to dialing patterns. However, we firmly believe that the impact will be mitigated through customer education. All NXX code holders should work with the Commission's consumer education Staff in order to inform customers and communities of the pending change in local dialing patterns. By June 1, 2014, each NXX code holder in the "740" NPA must file its consumer education plan in this docket. Each plan should explain how subscribers would be informed of the necessary change in local dialing patterns. Although basic local and nonoptional extended area service calls are required on a ten- and eleven-digit basis, company education plans should emphasize the use of ten-digit dialing for these calls. Finally, all telephone companies must take every necessary step to ensure that the applicable directory assistance service databases and directories are updated to reflect any changes resulting from this Opinion and Order.

All telephone companies in the "740" NPA should work with the various 9-1-1 systems to assist in the transition. Additionally, all alarm companies should make sure that any necessary reprogramming related to the requisite change in dialing patterns should occur by the commencement of the mandatory dialing period.

FINDINGS OF FACT AND CONCLUSIONS OF LAW:

- (1) Neustar has notified Staff that the "740" NPA is projected to exhaust by the second quarter of 2015.

- (2) Pursuant to the guidelines established in 97-884, as modified by the Commission's letter of March 18, 2013, Neustar distributed relief planning materials on April 1, 2013.
- (3) On May 1, 2013, Neustar facilitated an industry conference call to allow the telecommunications industry to come to a consensus on the area code relief alternative to recommend to the Commission.
- (4) On September 24, 2013, Neustar, on behalf of the Ohio telecommunications industry, filed its report to the Commission recommending adoption of the overlay alternative.
- (5) By its Entry of November 6, 2013, all interested entities were invited to electronically file comments regarding the overlay and split area code relief options.
- (6) Upon review of the record, the Commission finds that the overlay plan is the more appropriate and equitable plan to address "740" area code relief.

It is, therefore,

ORDERED, That all telephone companies presently serving the "740" NPA should pursue the overlay plan as directed in this Opinion and Order. It is, further,

ORDERED, That all telephone companies in the "740" NPA implement ten- and eleven-digit local call dialing in accordance with the time frames stated in this Opinion and Order. It is, further,

ORDERED, That by June 1, 2014, all "740" NPA code holders file their overlay consumer education plans consistent with this Opinion and Order. It is, further,

ORDERED, That all telephone companies update their directory service databases and directories in accordance with this Opinion and Order. It is, further,

ORDERED, That all telephone companies should work with the 9-1-1 systems currently in the "740" NPA to assist with any transition resulting from the implementation of the overlay plan. It is, further,

ORDERED, That the motion pro hac vice be granted in accordance with this Opinion and Order. It is, further,

ORDERED, That a copy of this Opinion and Order be served upon all parties and interested persons of record in this case.

THE PUBLIC UTILITIES COMMISSION OF OHIO


Todd A. Snitchler, Chairman


Steven D. Lesser

Lynn Slaby

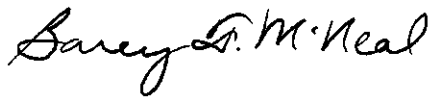

M. Beth Trombold


Asim Z. Haque

JSA/vrm

Entered in the Journal

DEC 11 2013



Barcy F. McNeal
Secretary

Barcy F. McNeal
Secretary