



August 26, 2021

Electronically Filed

Tanowa Troupe
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215

**Re: Case No: 21-873-TP-COI
In the Matter of the Commission's Investigation Into
Exhaust Relief for Area Code "513"**

Dear Ms. Troupe:

SomosGov, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby submits for filing a petition on behalf of the Ohio telecommunications industry for relief of the "513" area code.

If you have any questions regarding this filing, please contact me at 925-420-0340.

Respectfully submitted,

Florence Weber
Senior Director,
North American Numbering Plan Administrator
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**Before the
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Commission's)
Investigation Into Exhaust Relief)
For Area Code "513")**

Case No: 21-873-TP-COI

**PETITION OF THE NORTH AMERICAN NUMBERING
PLAN ADMINISTRATOR ON BEHALF OF THE OHIO
TELECOMMUNICATIONS INDUSTRY**

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 Ohio and on behalf of the Ohio telecommunications industry ("Industry"),¹ hereby notifies the Public Utilities Commission of Ohio ("Commission")² that the 513 NPA, serving Cincinnati and surrounding cities, is projected to exhaust its Central Office codes (often referred to as "CO" or "NXX" codes) by the second quarter of 2023 and needs relief. This means that absent relief, the supply of CO codes in the 513 NPA is estimated to run out by the projected exhaust quarter. In accordance with Industry guidelines, only an overlay will meet requirements for relief of the 513 NPA, which is scheduled to transition to mandatory 10-digit local dialing due to the national implementation of 988 as an abbreviated dialing code to reach the National Suicide Prevention Lifeline.³

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 513 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.

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

The Industry recommends that it implement the new overlay NPA based upon a nine-month schedule, after customer education of the transition to mandatory 10-digit local dialing is completed in the 513 NPA. Adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six months prior to the projected exhaust of the 513 NPA. The industry will complete the implementation of mandatory 10-digit dialing by July 2022, well before starting the utilization of the new NPA, and respectfully requests that the Commission expeditiously approve the Industry's plan to implement the overlay as set forth herein.

Background: The 513 NPA is one of the original NPAs in Ohio and has been in service since 1947. In 1996, with the 513 NPA nearing exhaust, the Commission approved a geographic split of the 513 NPA, introducing the 937 NPA.

With the 513 NPA once again nearing exhaust, the Commission issued an order in Case No. 99-668-TP-COI on September 28, 2000, directing the industry to implement an all-services overlay for the relief of the 513 NPA. As a result of that order, the new 283 NPA code was assigned. The Commission later announced that a decrease in the demand for CO codes had delayed the need for area code relief in the 513 NPA and issued an order suspending the implementation of the new 283 NPA indefinitely.⁴ On September 23, 2014, the Commission closed Case No. 99-668-TP-COI. The 513 NPA is nearing exhaust once again therefore necessitating the instant petition.

The 513 NPA serves Cincinnati and surrounding cities such as Forest Park, Hamilton, Lebanon, West Chester, Mason, Maineville, Middletown, Norwood, Oxford, Harrison, Cleves, Miamitown, and Trenton. The 513 NPA is bordered on the north and

⁴ *In the Matter of the Commission's Investigation Into Exhaust Relief for Area Code "513"*, Opinion and Order, Case No. 99-668-TP-COI (Mar. 14, 2002).

northeast by the 937/326 overlay complex, to the south by the Kentucky 859 NPA and to the east by the Indiana 765 NPA and 812/930 NPAs.

As required by the FCC, NANPA collects NPA and CO code assignment, utilization and forecast data to determine the projected demand for numbering resources. NANPA uses this data to project the exhaust date of each NPA and publishes the results twice a year. In April 2021, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2021 NRUF Report”) which indicated that the 513 NPA would exhaust during the second quarter 2024.⁵ However, due to an increase in CO code requests in the 513 NPA, NANPA declared jeopardy on June 17, 2021 and issued a “delta NRUF” which revised the estimated exhaust date to the second quarter 2023.⁶ NANPA convened an industry meeting via web conference on July 8, 2021, where the industry agreed to final jeopardy procedures to ration the remaining CO codes in the 513 NPA until relief can be implemented.⁷

Based upon the revised projected exhaust timeframe, NANPA then convened an industry NPA relief planning meeting via web conference on July 27, 2021.⁸ During this

⁵ The April 2021 NRUF and NPA Exhaust Analysis (“April 2021 NRUF Report”). The April 2021 NRUF Report can be accessed on the NANPA website at: <https://www.nationalnanpa.com>.

⁶ The April 2021 NPA Exhaust Forecast Analysis Changes as of June 17, 2021 (“June 17, 2021 Delta NRUF”) can be accessed on the NANPA website at: https://www.nationalnanpa.com/reports/Changes_from_April2021_%20NRUF_Forecast.pdf.

⁷ The 513 NPA (Ohio) Final Jeopardy Procedures can be accessed on the NANPA website at: https://www.nationalnanpa.com/pdf/OH_513_Final_Jeopardy_procedures_07.08.21.pdf.

⁸ A copy of the July 27, 2021 meeting minutes is attached and is incorporated as Exhibit A.

meeting the Industry reviewed an Initial Planning Document (IPD)⁹ which included three alternatives for relief:

- **Alternative #1:** An All-Services Distributed Overlay of the 513 NPA.

An all-services distributed overlay is a form of NPA Relief wherein a new NPA is assigned to the same geographic area occupied by the exhausting NPA. Alternative #1 has a projected life of 59 years.

- **Alternative #2:** A Boundary Elimination Overlay of the 513 and 937/326 NPAs.

The boundary between the existing 513 NPA and 937/326 NPAs would be eliminated and the 513 NPA and 937/326 NPAs would be assigned to the same geographic areas occupied by the existing 513 NPA and 937/326 NPAs. CO codes from the non-exhausting NPAs would be assignable in the exhausting NPA, and any remaining CO codes from the exhausting NPA would be assignable in the non-exhausting NPAs after the overlay is implemented. This option would save one NPA and reunite the 513 and 937/326 NPAs that were previously split in 1996. Alternative #2 has a projected life of 25 years.

- **Alternative #3:** A Boundary Elimination Overlay of the 513 and 937/326 NPAs with the addition of a new overlay NPA.

The boundary between the existing 513 NPA and 937/326 NPA codes would be eliminated and the new 283 NPA code would be assigned to the same geographic area occupied by the existing 513 NPA and 937/326 NPAs with the effective date of the area code boundary elimination. CO codes from the non-exhausting NPAs would be assignable in the exhausting NPA, and any remaining CO codes from the exhausting

⁹ A copy of the IPD is attached and is incorporated as Exhibit B.

NPA would be assignable in the non-exhausting NPA after the overlay is implemented. CO codes from the new 283 NPA would be assignable after the CO codes from all three of the existing NPAs are exhausted. This option would reunite the 513 and 937/326 NPAs that were previously split in 1996. Alternative #3 has a projected life of 52 years.

The 513 NPA is scheduled to complete the transition to mandatory 10-digit local dialing by July 15, 2022, as a result of the FCC's Order approving the designation of the 988 as the three-digit abbreviated dialing code for the National Suicide Prevention Lifeline.¹⁰ Because mandatory 10-digit-dialing will be implemented in the 513 NPA, a geographic split is not an option for relief.¹¹

At the July 27, 2021 meeting, the Industry discussed the attributes of all three relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay, for relief of the 513 NPA, as previously ordered by the Commission. Therefore, as the original Case No. 99-668-TP-COI is closed, the Industry recommends that the Commission issue a new order approving the all-services distributed overlay as the method of relief for the 513 NPA. The Industry also established, by consensus, a relief implementation schedule which includes flexible timeframes so that the industry can accommodate certain holidays, high traffic days,

¹⁰ Under the industry 10-digit dialing transition plan for 988 implementation, customers will be educated to expect that mandatory 10-digit local dialing will begin on October 24, 2021. Service providers have between October 24, 2021, and July 15, 2022, to remove 7-digit local dialing in the 513 NPA from their networks. See the 988 milestones posted on the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html

¹¹ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, July 2, 2021) at §5.6.3 ("NPA Relief Planning Guidelines"). To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Relief Planning Guidelines to assist NANPA, the Industry, and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://www.atis.org/01_committ_forums/inc/documents/.

network freeze periods, and implementation dates for other NPA relief activities occurring in other parts of the country.

Description of the Overlay: The all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 513 NPA as previously ordered by the Commission, and is projected to last approximately 59 years. NANPA would not assign CO codes from the already assigned new overlay 283 NPA code until all assignable CO codes from the 513 NPA are exhausted. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. The implementation of an overlay requires mandatory 10-digit dialing for local calls, including calls within the same NPA. However, by the time the new overlay is effective, customers in the 513 NPA will already have transitioned to mandatory 10-digit local dialing as a result of the national implementation of the 988 abbreviated dialing code to reach the National Suicide Prevention Lifeline.

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

Industry-Recommended Dialing Plan for the 513/283 All-Services Distributed Overlay:

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 permissive dialing at service provider's discretion

The Industry reached consensus to recommend a nine-month implementation schedule for the 283 NPA overlay. The schedule does not include specific dates, but rather timeframes to identify the phases of implementation. The Industry will select specific dates at an initial implementation meeting, that will be scheduled once the Commission has approved the instant Petition, to ensure the dates do not interfere with certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring within the country. Moreover, the Commission's expeditious approval of the instant Petition and adherence to the proposed implementation schedule timeframes will avoid denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

The Industry-agreed upon implementation schedule timeframes is set forth in the table below. It should be noted that there is no requirement for a permissive dialing period because it is expected that mandatory 10-digit local dialing will be enforced by the time the nine-month implementation schedule is completed.

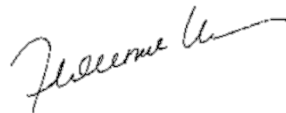
Industry-Recommended Implementation Schedule for the 513/283 All-Services Distributed Overlay:

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 4Q2022

**CO codes in the new 283 NPA will not be assigned until all available codes in the existing 513 NPA have been exhausted.*

Conclusion: The Industry requests that this Petition for the relief of the 513 NPA be granted expeditiously without a hearing, as the 513 NPA is in jeopardy, and the Commission previously approved an all-services distributed overlay in Case No, 99-668-TP-COI. To the extent possible, the Industry requests that the Commission forgo in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this petition, the Industry will implement the new 283 NPA as an all-services overlay over the 513 NPA in accordance with the implementation schedule set forth above. As such, the Industry requests that the Commission grant this petition no later than December 31, 2021.

Respectfully submitted,



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August 26, 2021

EXHIBIT A



August 12, 2021

To: All 513 NPA Code Holders and Interested Industry Members (Ohio)

Subject: Final Minutes of the Initial Relief Planning Meeting for the 513 NPA

Attached are the final minutes from the July 27, 2021, Ohio 513 NPA Initial Relief Planning meeting. These meeting minutes became final on August 12, 2021 and include edits.

If you have any questions, please give me a call at (925) 420-0130 or contact me by email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NANPA

cc: Robbin Russell – PUCO Staff

**OHIO 513 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE
FINAL MINUTES
July 27, 2021**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Cecilia then reviewed the agenda.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Cecilia 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

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

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA.
- Distributes the notice with the relief filing at least three weeks prior to the initial relief planning meeting, which was completed on June 28, 2021.
- Reviews the recommended area code overlay to a single NPA when 10-digit dialing has or will be implemented per section 5.6.3 of the Industry Numbering Committee (INC) NPA Code Relief Planning and Notification Guidelines (“Guidelines”).
- The main objective is achieved by reaching consensus on the relief filing to the Public Utilities Commission of Ohio (PUCO).
- Determines any additional items to include in the relief filing with the PUCO such as the implementation intervals, dialing plans, and compliance with any state specific requirements.
- Then NANPA is charged with the responsibility of submitting a relief filing, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will submit the relief plan letter within six weeks of today’s meeting, which is by September 7, 2021.

REVIEW NPA RELIEF PLANNING GUIDELINES

Cecilia reviewed pertinent sections of the NPA Code Relief Planning and Notifications Guidelines (ATIS-0300061; “the Guidelines”). Section 5 of the guidelines state: *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.*

Section 5.1 of the guidelines state: *The NPA relief planning process shall begin immediately if*

NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning has begun. NANPA will distribute the Initial Planning Document to the industry within four weeks of the declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more than eight weeks after the Jeopardy announcement,

An overlay is the only option for relief of the 513 NPA, per section 5.6.3 of the Guidelines which state:

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

Cecilia noted that a boundary elimination overlay was also a viable option of relief for the 513 NPA as stated in section 6.3.2 of the guidelines.

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and spare NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has spare capacity. This solution has the advantage of not requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief.

Cecilia also referred the industry participants to Annex B of the guidelines which lists issues to be considered during NPA relief planning.

Cecilia then referred the participants to the relief planning meeting aids included in the meeting notice: excerpts from the INC Guidelines, and the Customer and Technical Milestones. These meeting aids will assist the participants in their decision-making and the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS

The 513 NPA was introduced in 1947 and was one of the four original NPAs covering the state of Ohio. The 513 NPA resides in the southwest quadrant of the state. In 1996, a two-way geographic split was implemented for the relief of the 513 NPA, creating the 937 NPA. The 937 NPA was overlayed by the 326 NPA on March 8, 2020.

On September 28, 2000, the Public Utilities Commission of Ohio (“Commission”) issued an order in Case No. 99-668-TP-COI directing the implementation of an all-services overlay for the relief of the 513 NPA. On March 14, 2002, the Commission announced that a decrease in the demand for NXX codes delayed the need for area code relief in the 513 NPA and ordered that the rollout of the new 283 NPA and the corresponding implementation of 10-digit dialing be suspended indefinitely. On September 23, 2014, the case was closed. Now that the 513 NPA is within 36-months prior to exhaust, NANPA must restart the NPA relief planning process.

The 513 NPA serves Cincinnati and surrounding cities, such as Forest Park, Hamilton, Lebanon, West Chester, Mason, Maineville, Middletown, Norwood, Oxford, Harrison, Cleves, Miamitown,

and Trenton. The 513 NPA is bordered on the north and northeast by the 937/326 overlay complex, south by the KY 859 NPA and to the east the IN 765 NPA and 812/930 NPAs.

Exhaust Forecast:

The April 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2021 NRUF Report”), published by NANPA, indicates that the 513 NPA will exhaust during the second quarter of 2024. Relief planning for an additional overlay NPA is to start in the second quarter of 2021. On June 17, 2021, NANPA issued a revised exhaust forecast, moving in the projected exhaust forecast date to the second quarter of 2023, resulting in the need for NANPA to declare jeopardy.

Jeopardy:

The 513 NPA was declared in jeopardy on June 17, 2021. Interim jeopardy procedures were implemented immediately with the first lottery to take place in July 2021. A meeting was held on July 8, 2021, to reach consensus on final jeopardy procedures. Rationing was set to 1 code allocated per month and a trigger was set to reconvene the industry after the April 2022 lottery and the NRUF and NPA Exhaust Analysis is posted.

NPA STATUS

513 NPA: As of July 26, 2021, the 513 NPA has 752 central office (CO) codes assigned, 27 codes available for assignment, and 21 unavailable codes. There are 47 total service providers in the 513 NPA and one OCN that has only thousands-blocks.

937/326 NPA: As of July 26, 2021, the 937 NPA has 765 codes assigned, 16 codes available for assignment, and 19 unavailable codes. The 326 NPA has 40 codes assigned, 743 codes available for assignment and 17 unavailable codes. There are 55 total service providers in the 937/326 NPA and four OCNs that have only thousands-blocks. (See attachment #2)

THOUSANDS-BLOCK INFORMATION

Cecilia reported that in the 513 NPA, pooling commenced on March 17, 2003, there are 25 rate centers and all are mandatory for pooling. In the period of August 1, 2020 to July 26, 2021, 267 blocks have been assigned and as of July 26, 2021 there are 64 blocks available for assignment to service providers. Pooling has assigned 13 codes in the same period, 8 for pool replenishment and 5 for LRNs. The forecasted need for the next twelve months is 11 codes for pool replenishment and dedicated customers.

In the 937/326 NPA, pooling commenced on October 30, 2002, there are 123 rate centers, and all are mandatory for pooling. In the period of August 1, 2020 to July 26, 2021, 522 blocks have been assigned and as of July 26, 2021 there are 868 blocks available for assignment to service providers. Pooling has assigned 28 codes in the same period, 24 for pool replenishment and 4 for LRNs. The forecasted need for the next twelve months is 10 codes for pool replenishment and dedicated customers and 1 code for an LRN. (See attachment #3)

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

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

The 513 NPA is one of the NPA's transitioning to 10-digit local dialing to ensure users can dial 988 and reach the National Suicide Prevention Lifeline.

Cecilia also reviewed the implementation schedule to transition to 10-digit local dialing as outlined in PL-556.

ACTION	TIME	DATE
Start of permissive 10-digit dialing ("permissive 10-digit dialing effective date")	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the "permissive dialing date" and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation)
End of permissive dialing and start of mandatory 10-digit dialing ("mandatory 10-digit dialing effective date")	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the "mandatory dialing date" and starts the 8.5-month period where carriers can start enforcing mandatory 10-digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts)

		to enforce mandatory 10-digit dialing)
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Cecilia also reviewed

- Code holder lists for 513 NPA
- Code holder lists for 937/326 NPA
- Rate center lists for 513 NPA
- Rate center list for 937/326 NPA
- Maps of various relief alternatives

REVIEW OF RELIEF PLANNING OPTIONS

Cecilia presented three overlay options for relief of the 513 NPA:

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

The 283 NPA would be assigned to the same geographic area occupied by the existing 513 NPA. Customers would retain their current telephone numbers, however 10-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the 283 NPA will be assigned upon request with the effective date of the new 283 area code. At exhaust of the 513 NPA, all future code assignments will be made in the 283 NPA. The projected life would be:

Total CO Codes = 773

Total Rate Centers = 25

Area Code Life in Years = 59 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 513 NPA and 937/326 NPA codes would be eliminated and the 513 NPA and 937/326 NPAs would be assigned to the same geographic areas occupied by the existing 513 NPA and 937/326 NPAs. The 513 NPA and 937/326 NPA customers would retain their current telephone numbers, however, ten-digit dialing for all calls by all customers within the 513 NPA affected area would be required. Available central office codes in the 937/326 NPA will be assigned upon request in the 513 NPA area with the effective date of the new area code boundary and available 513 NPA central office codes could be assigned upon request in the 937/326 NPA area. At exhaust of the 513 NPA, all future CO code assignments will be made from the 937/326 NPA supply of central office codes. The 937/326 NPA overlay complex has 123 rate centers and the projected exhaust is 2Q2067. Eliminating the boundary between the 513 NPA and 937/326 NPA would have a combined life of 25 years and would save one NPA. This would also reunite the 513 and 937/326 NPAs that were previously split in 1996.

513 NPA

Total CO Codes = 773

937/326 NPA

Total CO Codes 937 NPA = 782

Total Rate Centers = 25

Total CO Codes 326 NPA = 56

Total Rate Centers = 123

Combined Area Code Life in Years = 25 years

ALTERNATIVE #3 - NPA BOUNDARY ELIMINATION OVERLAY WITH AN ALL-SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 513 NPA and 937/326 NPA area would be eliminated and the new 283 NPA code would be assigned to the same geographic area occupied by the existing 513 NPA and 937/326 NPAs with the effective date of the new area code boundary. The 513 NPA and 937/326 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within the 513 NPA affected area would be required. Available CO codes in the 937/326 will be assigned upon request in the 513 NPA area with the effective date of the new area code boundary and available 513 NPA central office codes will be assigned upon request in the 937/326 NPA area. At exhaust of the 513 and 937/326 NPAs all future code assignments will be made from the 283 NPA. The 513 NPA has 25 rate centers, and the projected exhaust date is 2Q2023. The 937/326 NPA overlay complex has 123 rate centers and the projected exhaust is 2Q2067. Eliminating the boundary between the 513 and 937/326 NPAs and adding an all services overlay over both geographic areas would have a combined life of 52 years. This would also reunite the 513 and 937/326 NPAs that were previously split in 1996.

The projected life would be:

513 NPA

Total CO Codes = 773

Total Rate Centers = 25

937/326 NPA

Total CO Codes 937 NPA = 782

Total CO Codes 326 NPA = 56

Total Rate Centers = 123

Combined Area Code Life in Years = 52 years

CONSENSUS ON RELIEF ALTERNATIVE

There was much discussion on the relief alternative to be recommended to the PUCO. A proposal was made to recommend Alternative #1, all-services distributed overlay. A comment was made that by choosing Alternative #2, boundary elimination overlay, it would save an NPA for 25 more years in which time Nationwide Number Portability (NNP) may be a viable option to further delay implementing a new area code and extending the life of the NANP. Comments were also made that a boundary elimination overlay involved the re-programming of many more switches than a single-overlay due to the addition of the 937/326 NPA. After further discussion, consensus was reached among the industry members to recommend Alternative #1, the all-services distributed overlay.

The all-services distributed overlay will be included as the industry's choice of relief in the petition filed with the PUCO. The all-services distributed overlay was the industry's preferred form of relief due to the following pros and cons listed below:

All-Services Distributed Overlay Pros and Cons:

Pros:

Alternative # 1	
1	All existing customers would retain the 513 area code and would not have to change their telephone numbers.
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 only show 7-digit numbers.
6	Provides the most efficient distribution of numbering resources by allowing assignments to follow demand, not withstanding forecasts for growth
7	No need for synchronization of old and new NPAs in NPAC databases
8	Minimizes call routing issues, especially with ported numbers
9	Easier for service providers to implement from a translations, billing and service order system perspective
10	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
11	The PUCO would not have to decide which side gets the new NPA, so no winners and losers.
12	Does not split cities or counties into different area codes.
13	Keeps communities of interest intact.
14	No impact on some wireless carriers that have to reprogram handsets manually
15	No technical impacts to number portability, text messaging or multimedia messaging
16	The all-services distributed overlay is easier for ILECs to implement than a boundary elimination overlay
17	The all-services distributed overlay has a longer projected life than the boundary elimination overlay.
Cons:	
Alternative # 1	
1	An additional NPA needs to be assigned

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

There was discussion regarding the dialing plan. A recommendation was made, and consensus was reached to include the following dialing plan as the dialing plan that will be applied to the 513 NPA with the implementation of an all-services distributed overlay. This dialing plan is consistent with other overlays within the state of Ohio. There was discussion whether Extended Area Service (EAS) should be included in the dialing plan. It was determined that it would remain listed in the dialing plan. There was additional discussion regarding the note listed on the dialing plan. In previous Ohio overlays, the note on the dialing plan stated: **1+10 digit permissible required excluding CMRS providers*, but industry participants chose not to include the note.

Consensus was reached on the following dialing plan:

Dialing Plan for the All-Services Overlay:

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 permissive dialing at service provider's discretion

After discussion on a suggested implementation schedule, consensus was reached on a 9-month implementation schedule as follows:

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 4Q2022

**CO codes in the new 283 NPA will not be assigned until all available codes in the existing 513 NPA have been exhausted.*

MILESTONES:

A recommendation was made, and consensus was reached to include the following Customer Education and Technical milestones for the 513 NPA overlay implementation.

Customer Education Milestones:

	Responsibility
1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Carriers
2 Issue initial press release	PUCO; and all carriers to the extent they are able to do so
3 Send Special letters to PSAPs and Directory Publishers	Volunteer industry committee co-chairs
4 Update social media with information regarding overlay	All carriers (optional)
5 Update websites with information regarding overlay	All carriers
6 Issue second) press release	PUCO and all carriers to the extent they are able to do so

Technical Milestones:

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

Translations	
11 Verify if all PSAP work has been completed	PSAPs
12 Activate E911 Network/Tandem Translations	E911 Providers

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD

There were no statements for the record.

Cecilia reviewed the following schedule for the remaining events to be completed for the OH 513 NPA.

OH 513 NPA Relief Planning Meeting & Draft Filing Schedule

July 27 – Initial Relief Planning Meeting

August 10 – Draft Minutes

August 17 – Final Minutes

August 17 – Post Draft Filing via NNS

August 24 – Draft Filing Review Meeting

September 7 – Submit Relief Filing with PUCO

MEETING MINUTES APPROVAL

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry no later than August 10, 2021. However, the minutes were distributed on August 5, 2021. Any changes or corrections are to be submitted to Cecilia via cmccabe@nanpa.com by August 12, 2021, when the minutes will become final.

The meeting was adjourned

###

**Ohio 513 NPA
Initial Relief Planning Meeting via Web Conference
Meeting Attendees
July 27, 2021**

NAME	COMPANY
Sharon Poer	AT&T
Rita Schmitz	CenturyLink/Lumen
Allyson Blevins	Charter Communications
Melissa McKee	Cincinnati Bell Telephone
Glenn Frable	Cincinnati Bell Telephone
Cathy Setser	Cincinnati Bell Telephone
Leslie Miklos	Consolidated Communications
Nicole Patrick	Everstream
Paul Belote	Inteliquent
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Jeff Jones	Public Utilities Commission of Ohio
Aubrey Barker	Public Utilities Commission of Ohio
Robbin Russell	Public Utilities Commission of Ohio
Jason Well	Public Utilities Commission of Ohio
Marianne Townsend	Public Utilities Commission of Ohio
Karen Riepenkroger	T-Mobile
Terri Arakelian	T-Mobile
Anne Chism	TDS
Paul Nejedlo	TDS
Laura Dalton	Verizon
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless
Scott Terry	Windstream

Ohio 513 and 937/326 NPA CO Code Summary

<u>NPA</u>	<u>513</u>	<u>937</u>	<u>326</u>			
Assigned NXXs	752	765	40			
Protected NXXs	0	0	0			
Reserved NXXs	0	0	0			
Unavailable NXXs	21	19	17	See Note		
Available NXXs	27	16	743			
Total	800	800	800			
<u>Codes Assignment History</u>						
2016	8	18	0			
2017	9	14	0			
2018	14	5	0			
2019	5	5	0			
2020	18	6	25			
2021	7*	7*	16*			
*As of July 26, 2021						
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	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	OH 513
MEETING DATE:	7/27/2021
POOL START DATE (PSD)	3/17/2003
RATE CENTERS	
<i># Total</i>	25
<i># Mandatory</i>	25
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	6
BLOCKS ASSIGNED	
<i># Total</i>	267
<i>(For time period 8/01/20 - 7/26/21)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	64
<i>(As of preparation date: 7/26/21)</i>	
CODES ASSIGNED	
<i># Total</i>	13
<i># for Pool Replenishment</i>	8
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	5
<i>(For time period 8/01/20 - 7/26/21)</i>	
CODES FORECASTED	
<i># Total</i>	11
<i># for Pool Replenishment and Dedicated Customers</i>	11
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 7/26/21)</i>	

EXHIBIT B



June 28, 2021

To: All 513 NPA Code Holders and Interested Industry Members (Ohio)

Subject: Ohio 513 NPA Initial Relief Planning Document Review

The North American Numbering Plan Administrator (NANPA) is responsible for initiating area code relief in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented in accordance with the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061). The April 2021 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“2021 NRUF Report”), published by NANPA, indicated that the 513 NPA would exhaust during the second quarter of 2024. On June 17, 2021, NANPA issued a revised exhaust forecast, moving the exhausted forecast date to the second quarter of 2023. Additionally, on June 17, 2021, NANPA declared jeopardy in the 513 NPA.

The NPA Code Relief Planning and Notification Guidelines state that if a single NPA is scheduled or has already transitioned to 10-digit dialing, an overlay is the only option, and the Initial Planning Document (IPD) is not required. However, NANPA has determined that more than one overlay alternative is available as a viable relief option for the 513 NPA.

Accordingly, on July 27, 2021, NANPA will convene an industry NPA relief planning meeting to develop a recommended relief plan for the 513 NPA. The objective of this meeting is to reach consensus among members of the Ohio Telecommunication Industry on a single plan of relief for the 513 NPA. The resulting relief plan will be filed with the Public Utilities Commission of Ohio (PUCO) 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. Some of the relief alternatives in this document impact the 937/236 NPA.

Included with this meeting notice is the meeting agenda, consensus process, 513 NPA CO code summary and Pooling statistics report, relief planning meeting aid, Service Provider CO code assignments by OCN, Rate centers in the 513 NPA, customer and technical milestone worksheet, and associated maps. Due to the fact that a relief alternative outlined in this notice impacts the Ohio 937/326 NPAs, the Pooling statistics, CO code Summaries, Service Provider CO code assignments by OCN, and rate center table are included for this additional overlay complex.

Because the impacts of NPA relief are so significant and because this NPA is affected by the transition of the 988 NXX to a 3-digit code for the National Suicide Prevention Lifeline that will require 10-digit local dialing, NANPA strongly urges your participation on July 27, 2021. This may be the only meeting of the industry before a decision is reached on a recommended relief plan that will be submitted to the PUCO for approval. The details of the relief planning meeting are as follows:

Date: Tuesday, July 27, 2021

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

Join Zoom Meeting

<https://somos.zoom.us/j/93980597771?pwd=YTA0WHpUem0rZU1iNEpnM2hSOW83dz09>

Meeting ID: 939 8059 7771

Password: 743160

One tap mobile

8884754499,,93980597771# US Toll-free

8778535257,,93980597771# US Toll-free

Dial by your location

888 475 4499 US Toll-free

877 853 5257 US Toll-free

Meeting ID: 939 8059 7771

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you receive this notice from someone else and would like to receive additional information in the future about the 513 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (925) 420-0130 or via email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe

NPA Relief Planner

NANPA

CC: Robbin Russell – PUCO Staff

**OHIO 513 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL**

July 27, 2021 - 1:00 PM (ET)

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review 513 NPA Background and History

Review 513 and 937/326 NPA Status

Review Initial Planning Document and Proposed Alternatives

Consensus on Relief Alternative

Consensus on Implementation Intervals for Relief

Consensus on Customer Education and Technical Milestones

Consensus on Implementation Intervals for Milestones

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

7 RESOLUTION PROCESS

7.1 Consensus

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

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

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

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

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 five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.
- 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, implementation of 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 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 each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 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 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 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

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.

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., 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 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 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 weeks of the declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more than eight weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is 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 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.

5.5.1 Modifications to Previous Industry Agreements

This process provides industry participants an opportunity under prescribed circumstances to reopen and possibly modify previous agreements reached by consensus. To be fair to all parties and cognizant of the time and effort required to reach industry consensus, the following procedures shall be used to request a reopening of a previous consensus agreement(s).

- At least two Affected Parties are required to request the reopening and review of a consensus agreement(s) achieved at a previous industry meeting. This excludes a previously agreed to industry NPA relief plan, regardless of whether or not that plan has been filed. The request by the parties for a reopening/review must be made in writing to the Director, North American Numbering Plan Administration.
- At least three Affected Parties are required to request the reopening of a previously agreed to industry NPA relief plan that has not been filed with the appropriate regulatory authority. The request by the parties for a reopening/review shall be made in writing to the Director, North American Numbering Plan Administration.
- NANPA shall request a reopening of previous consensus agreements after receiving regulatory approval when circumstances could potentially have a significant impact to the implementation plan.
- NANPA shall notify all Affected Parties at least two (2) weeks in advance that a special conference call has been scheduled. Attached to the notice will be the reasons for and description of the proposed changes. Every effort will be made to avoid conflicts with other industry meetings so that all parties may participate.
- At the beginning of the conference call, Affected Parties will consider whether the previous consensus agreement will be reopened for discussion. If consensus is reached to reopen the discussion, the call will proceed. Absent such a consensus, the conference call will be adjourned.
- Only issues related to the scheduled topic will be considered on this special conference call.
- Meeting minutes shall be produced and distributed by NANPA within 10 business days of the conference call.

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.

5.6 Notify Appropriate Regulatory Authority

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

5.6.1

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

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

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

5.6.2

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

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

NANPA shall notify all Affected Parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g., an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local⁴ and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted

⁴ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

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

5.6.3

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

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

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

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

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.

6.2 Boundary Realignment Method

⁵ For example, FCC 20-100, ¶53.

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 Overlay Method

An NPA 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.⁶ 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 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 allows the option to eliminate the permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an NPA overlay. They are listed below:

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be appropriate where the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new NXXs in that section would be assigned from the new NPA. As the NXXs allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available NXXs to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA.

6.3.2 Boundary Elimination Overlay

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and spare NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has spare capacity. This solution has the advantage of not requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief.

6.3.3 Multiple Overlay

The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic

⁶ 47 CFR §52.19 (c) (3) (ii).

area and where it would be difficult to implement another kind of relief. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists.

6.3.4 Technology-specific or Service-Specific Overlay

These overlays occur when a new area code is introduced to serve the same geographic area as one or more existing area code(s) and numbering resources in the new area code overlay are assigned to a specific technology(ies) or service(s). State commissions may not implement a technology-specific or service-specific overlay without express authority from the FCC.⁷ Such overlays are not feasible where local number portability and/or thousands-block pooling have been implemented.

A state commission seeking delegated authority from the FCC to implement a technology-specific or service-specific overlay should discuss why the numbering resource optimization benefits of the proposed overlay would be superior to implementation of an all-services overlay.⁸

6.4 Other

A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlays, as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations and community needs and requirements.

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

⁷ 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶67-94.

⁸ See FCC 01-362 ¶ 81-94.

- 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)

This meeting aid is a compilation of industry developed Pros and Cons 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 ____ area code and would not have to change their telephone numbers.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
					3 Easier education process
					4 Less customer confusion and easier education process
					5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
					6 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.
					7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					8 Customers do not have to update personal printed material such as checks and websites, etc.
					9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth
					10 No need for synchronization of old and new NPAs in NPAC databases
					11 Minimizes call routing issues, especially with ported numbers
					12 Easier for service providers to implement from a translations, billing and service order system perspective
					13 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
					14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
					15 Does not split cities or counties into different area codes.
					16 Keeps communities of interest in tact.
					17 No impact on some wireless carriers that have to reprogram handsets manually
					18 No technical impacts to number portability, text messaging or multimedia messaging

						19	An all services overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice.
						20	An all services overlay would have a consistent local dialing pattern, as opposed to a concentrated overlay that could have two different types of local dialing in the ____ NPA.
						21	Helps move customers toward nationwide 10-digit dialing.

Overlay Pros and Cons:

Cons:

Alternative #							
						1	Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the ____ NPA and the new NPA.
						2	Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
						3	Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
						4	Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
						5	Loss of geographic identity with an overlay.
						6	Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

Boundary Elimination Overlay Pros and Cons:

Pros:

Alternative #							
						1	Eliminates need to open new NPA
						2	Does not require customers to change their area code.
						3	It is a more efficient use of resources.

Boundary Elimination Overlay Pros and Cons:

Cons:

Alternative #					
					1 Boundary elimination alternatives have shorter lives than the all-services overlay
					2 Impacts a larger quantity of customers than the all-services overlay
					3 Requires customers in either ___ or ___ NPAs to dial 10 digits where otherwise they wouldn't be subjected to NPA Relief for another ___ years.
					4 Complex customer education process, which would likely lead to increased customer confusion.

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)	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 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	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

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

Customer Milestones:

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

Technical Milestones:

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

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

Initial Planning Document

For

Relief of Ohio 513 NPA

July 27, 2021

North American Numbering Plan Administrator

Cecilia McCabe
NPA Relief Planner

513 NPA Background Information

Relief Planning Background and Assumptions:

The 513 NPA was introduced in 1947 and was one of the four original NPAs covering the state of Ohio. The 513 NPA resided in the southwest quadrant of the state. In 1996, a two-way geographic split was implemented for the relief of the 513 NPA creating the 937 NPA.

On September 28, 2000, the Public Utility Commission of Ohio (“Commission”) issued an order in Case No. 99-668-TP-COI directing the implementation of an all services overlay for the relief of the 513 NPA. On March 14, 2002, the Commission announced that a decrease in the demand for NXX codes has delayed the need for area code relief in the 513 NPA and has ordered that the rollout of the new 283 NPA and the corresponding implementation of ten-digit dialing be suspended indefinitely. On September 23, 2014, the case was closed, and the relief planning process must restart 36 months prior to exhaust.

The 513 NPA serves Cincinnati and surrounding cities, such as Forest Park, Hamilton, Lebanon, West Chester, Mason, Maineville, Middletown, Norwood, Oxford, Harrison, Cleves, Miamitown, and Trenton. The 513 NPA is bordered on the north and northeast by the 937/326 overlay complex, south by the KY 859 NPA and to the east the IN 765 NPA and 812/930 NPAs.

CO Code Summary:

As of June 23, 2021, the 513 NPA has 752 codes assigned, 27 codes available for assignment and 21 Un-Assignable codes. There are 47 service provider OCNs that are code holders in the 513 NPA and one OCN that is only a thousand-block holder in the NPA.

Exhaust Forecast:

The April 2021 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“2021 NRUF Report”), published by NANPA, indicates that the 513 NPA will exhaust during the second quarter of 2024. Relief planning for an additional overlay NPA is to start in the second quarter of 2021. On June 17, 2021, NANPA issued a revised exhaust forecast, moving the exhausted forecast date to the second quarter of 2023.

Jeopardy:

The 513 NPA was declared in jeopardy on June 17, 2021. Interim jeopardy procedures were implemented immediately with the first lottery to take place in July of 2021. A meeting has been scheduled on July 8, 2021, to reach consensus on final jeopardy procedures.

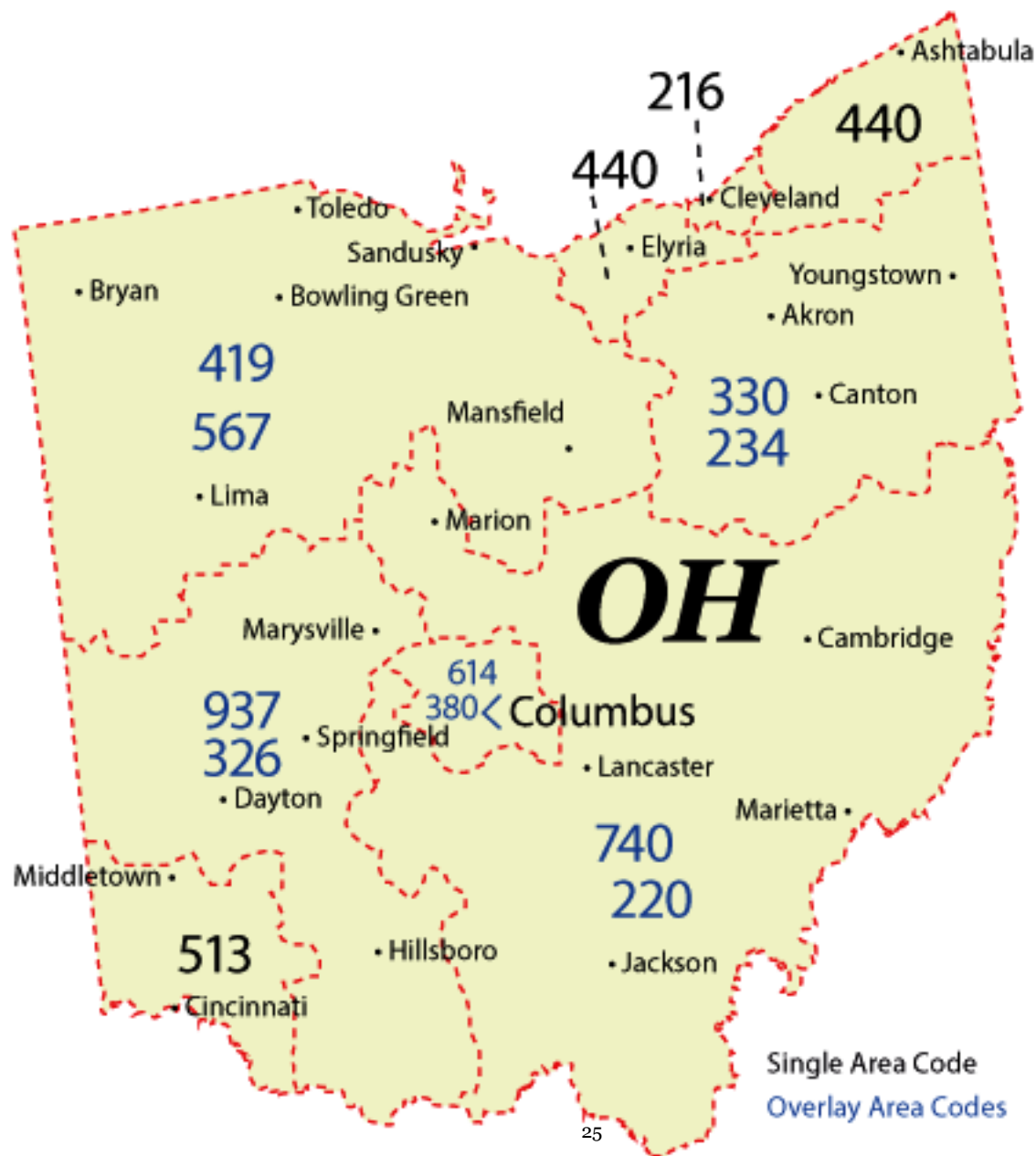
CURRENT DIALING PLAN

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

OVERLAY DIALING PLAN

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.



Ohio 513 and 937/326 NPA CO Code Summary

<u>NPA</u>	<u>513</u>	<u>937</u>	<u>326</u>			
Assigned NXXs	752	763	39			
Protected NXXs	0	0	0			
Reserved NXXs	0	0	0			
Unavailable NXXs	21	19	17	See Note		
Available NXXs	27	18	744			
Total	800	800	800			
<u>Codes Assignment History</u>						
2016	8	18	0			
2017	9	14	0			
2018	14	5	0			
2019	5	5	0			
2020	18	6	25			
2021	7*	5*	15*			
*As of June 23, 2021						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

POOLING STATISTICS		
<i>Provided By: Cecilia McCabe</i>		
ST/NPA:	OH 513	OH 937/326
MEETING DATE:	7/27/2021	7/27/2021
POOL START DATE (PSD)	3/17/2003	10/30/2002
RATE CENTERS		
<i># Total</i>	25	123
<i># Mandatory</i>	25	123
<i># Mandatory-Single Service Providers (M*)</i>	0	0
<i># Optional</i>	0	0
<i># Excluded</i>	0	0
BLOCKS ASSIGNED		
<i># Total</i>	253	491
<i>(For time period 8/01/20 - 6/23/21)</i>		
BLOCKS AVAILABLE		
<i>#Total</i>	78	869
<i>(As of preparation date: 6/23/21)</i>		
CODES ASSIGNED		
<i># Total</i>	13	25
<i># for Pool Replenishment</i>	8	21
<i># for Dedicated Customers</i>	0	0
<i># for LRNs</i>	5	4
<i>(For time period 8/01/20 - 6/23/21)</i>		
CODES FORECASTED		
<i># Total</i>	11	5
<i># for Pool Replenishment and Dedicated Customers</i>	11	5
<i># for LRNs</i>	0	0
<i>(For the next twelve months as of: 6/23/21)</i>		

Company	OCN	CountOfNXX
AIRUS INC	695H	1
AMERICAN MESSAGING SERVICES LLC	9748	8
AMERITECH OHIO	9321	10
AT&T LOCAL	7421	9
BANDWIDTH.COM CLEC LLC - OH	001F	16
BRIGHTLINK COMMUNICATIONS LLC	478J	1
BRIGHTLINK COMMUNICATIONS LLC	551G	1
BRIGHTLINK COMMUNICATIONS LLC - OH	924G	1
CBTS TECHNOLOGY SOLUTIONS LLC OH	600F	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - OH	6025	120
CENTURYLINK COMMUNICATIONS LLC	7575	3
CINCINNATI BELL EXTENDED TERRITORIES LLC - OH	309B	9
CINCINNATI BELL INC.	9348	252
CITYNET OHIO LLC - OH	036B	2
COMMIO LLC	939H	1
CSC WIRELESS LLC	425J	1
EXIANT COMMUNICATIONS LLC	114J	1
FRONTIER NORTH INC. - OH	0615	6
GLOBAL CROSSING LOCAL SERVICES INC.-OH	8638	12
HD CARRIER LLC	321J	2
ICG TELECOM GROUP - OH	7163	8
INTERMEDIA COMMUNICATIONS INC. - OH	7836	15
INVOXIO INCORPORATED	158H	1
IP HORIZON LLC	515J	1
LEVEL 3 COMMUNICATIONS LLC - OH	4863	18
LEVEL 3 TELECOM OF OHIO LLC - OH	7460	16
LITTLE MIAMI COMMUNICATIONS CORP.	0613	3
METRO PCS INC.	5562	6
NEW CINGULAR WIRELESS PCS LLC - IL	6534	52
ONVOY LLC - OH	464C	17
ONVOY SPECTRUM LLC	624H	1
PEERLESS NETWORK OF OHIO LLC - OH	284F	5
PNG TELECOMMUNICATIONS INC DBA POWER NET GLOBAL-OH	3395	1
SPRINT SPECTRUM L.P.	6664	40
TELEPORT COMMUNICATIONS AMERICA LLC - OH	7532	7
TELNYX LLC	073H	2
TERRA NOVA TELECOM INC.	145J	1
TIME WARNER CABLE INFORMATION SVCS (OHIO) - OH	547D	8

T-MOBILE USA INC.	6529	34
TON80 COMMUNICATIONS LLC	516J	1
TWILIO INTERNATIONAL INC.	506J	1
UNITED TEL. CO. OF OHIO - CENTURYLINK	0661	13
USA MOBILITY WIRELESS INC.	6630	19
VONAGE NETWORK INC.	197D	1
WIDE VOICE LLC - OH	765H	2
WINDSTREAM NUVOX OHIO LLC	3376	16
YMAX COMMUNICATIONS CORP. - OH	261E	1

Block holders with No CO Codes Assigned

Company	OCN
AT&T CORP.	516C

Company	OCN	CountOfNXX
AIRUS, INC	695H	2
AMERICAN MESSAGING SERVICES, LLC	9748	16
AMERITECH OHIO	9321	159
AT&T CORP.	516C	6
AT&T LOCAL	7421	6
BANDWIDTH.COM CLEC, LLC - OH	001F	14
BRIGHTLINK COMMUNICATIONS, LLC	478J	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
CBTS TECHNOLOGY SOLUTIONS LLC OH	600F	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - OH	6025	59
CENTURYLINK COMMUNICATIONS LLC	7575	10
CHOICE ONE COMMUNICATIONS, INC. - OH	3765	8
CINCINNATI BELL EXTENDED TERRITORIES LLC - OH	309B	13
CITYNET OHIO, LLC - OH	036B	1
COMMIO, LLC	939H	1
CSC WIRELESS, LLC	425J	1
CT COMMUNICATIONS NETWORK, INC. - OH	5632	2
EXIANT COMMUNICATIONS LLC	114J	1
FIRST COMMUNICATIONS, LLC - OH	9682	1
FRACTEL, LLC	965H	17
FRONTIER NORTH, INC. - OH	0615	54
GERMANTOWN INDEPENDENT TELEPHONE CO.	0618	1
GOLDSTAR COMMUNICATIONS, LLC - OH	9133	5
HD CARRIER LLC	321J	1
HORIZON SERVICES, INC. - OH	601G	3
ICG TELECOM GROUP - OH	7163	12
INTERMEDIA COMMUNICATIONS INC. - OH	7836	9
LEVEL 3 COMMUNICATIONS, LLC - OH	4863	42
LEVEL 3 TELECOM OF OHIO, LLC - OH	7460	16
MCI WORLDCOM COMMUNICATIONS, INC. - OH	7443	1
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- OH	0265	1
NEW CINGULAR WIRELESS PCS, LLC - IL	6534	71
ONVOY SPECTRUM, LLC	624H	1
ONVOY, LLC - OH	464C	16
PEERLESS NETWORK OF OHIO, LLC - OH	284F	5
PNG TELECOMMUNICATIONS INC DBA POWER NET GLOBAL-OH	3395	1
RCLEC, INC. - OH	457H	1
SIGECOM, LLC DBA WOW INTERNET CABLE AND PHONE	735E	1

SPRINT SPECTRUM L.P.	6664	59
TELEPORT COMMUNICATIONS AMERICA, LLC - OH	7532	6
TELNYX LLC	073H	5
TERRA NOVA TELECOM INC.	145J	2
THE CHAMPAIGN TELEPHONE COMPANY	0594	4
TIER 2 COMMUNICATIONS, LLC	8168	4
TIME WARNER CABLE INFORMATION SVCS (OHIO) - OH	547D	27
T-MOBILE USA, INC.	6529	15
TON80 COMMUNICATIONS, LLC	516J	2
TSC COMMUNICATIONS, INC. - OH	0640	1
UNITED TEL. CO. OF INDIANA, INC. DBA CENTURYLINK	0832	1
UNITED TEL. CO. OF OHIO - CENTURYLINK	0661	55
USA MOBILITY WIRELESS, INC.	6630	16
VONAGE NETWORK INC.	197D	1
WINDSTREAM NUVOX OHIO, LLC	3376	15
WINDSTREAM OHIO, LLC	0665	6
YMAX COMMUNICATIONS CORP. - OH	261E	1

Block holders with No CO Codes Assigned

Company	OCN
CENTURYLINK COMMUNICATIONS, LLC	508J
METRO PCS, INC.	5562
WABASH MUTUAL TELEPHONE COMPANY - OH	669D
AERIAL COMMUNICATIONS	6701

513 OH Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
513	BETHANY	BETHANY
513	BETHEL	BETHEL
513	BUTLERVL	BUTLERVILLE
513	CINCINNATI	CINCINNATI
513	CLERMONT	CLERMONT
513	FAYETTEVL	FAYETTEVILLE
513	FELICITY	FELICITY
513	HAMILTON	HAMILTON
513	HARRISON	HARRISON
513	LEBANON	LEBANON (WARREN)
513	LTL MIAMI	LITTLE MIAMI
513	MASON	MASON
513	MIDDLETOWN	MIDDLETOWN
513	MONROE	MONROE
513	MORNINGSUN	MORNING SUN
513	MORROW	MORROW
513	NEWTONSVL	NEWTONSVILLE
513	OXFORD	OXFORD
513	REILY	REILY
513	SEVEN MILE	SEVEN MILE
513	SHANDON	SHANDON
513	SO LEBANON	SOUTH LEBANON
513	TRENTON	TRENTON
513	WAYNESVL	WAYNESVILLE
513	WILLIAMSBG	WILLIAMSBURG

937/326 OH Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
326/937	ABERDEEN	ABERDEEN
326/937	ANNA	ANNA
326/937	ANSONIA	ANSONIA
326/937	ARCANUM	ARCANUM
326/937	BEAVERCREK	BEAVERCREEK
326/937	BELFAST	BELFAST
326/937	BELLBROOK	BELLBROOK
326/937	BELLE CTR	BELLE CENTER
326/937	BELLEFONTAN	BELLEFONTAINE
326/937	BLANCHESTR	BLANCHESTER
326/937	BOTKINS	BOTKINS
326/937	BOWERSVLE	BOWERSVILLE
326/937	BRADFORD	BRADFORD
326/937	BROOKVILLE	BROOKVILLE
326/937	BYHALIA	BYHALIA
326/937	CAMDEN	CAMDEN
326/937	CATAWBA	CATAWBA
326/937	CEDARVILLE	CEDARVILLE
326/937	CENTERVLE	CENTERVILLE (MONTGOMERY)
326/937	CHRISTISBG	CHRISTIANSBURG
326/937	CLARKSVL	CLARKSVILLE
326/937	COVINGTON	COVINGTON
326/937	DANVILLE	DANVILLE (HIGHLAND)
326/937	DAYTON	DAYTON
326/937	DE GRAFF	DE GRAFF
326/937	DECATUR	DECATUR
326/937	DONNELSVL	DONNELSVILLE
326/937	E LIBERTY	EAST LIBERTY (LOGAN)

NPA	Abbreviated Rate Center	Rate Center Full Name
326/937	EATON	EATON
326/937	ELDORADO	ELDORADO
326/937	ENGLEWOOD	ENGLEWOOD
326/937	ENON	ENON
326/937	FAIRBORN	FAIRBORN
326/937	FARMERSVL	FARMERSVILLE
326/937	FLTCHELENA	FLETCHER LENA
326/937	FRANKLIN	FRANKLIN
326/937	FT LORAMIE	FORT LORAMIE
326/937	GEORGETOWN	GEORGETOWN
326/937	GERMANTOWN	GERMANTOWN
326/937	GETTYSBURG	GETTYSBURG
326/937	GRATIS	GRATIS
326/937	GREENFIELD	GREENFIELD
326/937	GREENVILLE	GREENVILLE
326/937	HAMERSVL	HAMERSVILLE
326/937	HIGGINSPT	HIGGINSPOINT
326/937	HILLSBORO	HILLSBORO
326/937	HOLLANSBG	HOLLANSBURG
326/937	HUNTSVILLE	HUNTSVILLE
326/937	JACKSONCTR	JACKSON CENTER
326/937	JAMESTOWN	JAMESTOWN
326/937	LAURA	LAURA
326/937	LEESBURG	LEESBURG
326/937	LEWISBURG	LEWISBURG
326/937	LIBERTY	LIBERTY
326/937	LYNCHBURG	LYNCHBURG
326/937	MAGNETCSPG	MAGNETIC SPRINGS
326/937	MANCHESTER	MANCHESTER (ADAMS)
326/937	MARSHALL	MARSHALL

NPA	Abbreviated Rate Center	Rate Center Full Name
326/937	MARTINSVL	MARTINSVILLE
326/937	MARYSVILLE	MARYSVILLE
326/937	MECHANCSBG	MECHANICSBURG
326/937	MEDWAY	MEDWAY
326/937	MILFORDCTR	MILFORD CENTER
326/937	MOUNT ORAB	MOUNT ORAB
326/937	MOWRYSTOWN	MOWRYSTOWN
326/937	MSBGWCRLTN	MIAMISBURG WEST CARROLLTON
326/937	MT VICTORY	MOUNT VICTORY
326/937	NEW PARIS	NEW PARIS
326/937	NEW VIENNA	NEW VIENNA
326/937	NEWBRLNGTN	NEW BURLINGTON (CLINTON)
326/937	NEWCARLISL	NEW CARLISLE
326/937	NEWLEBANON	NEW LEBANON
326/937	NEWMADISON	NEW MADISON
326/937	NO HAMPTON	NORTH HAMPTON
326/937	NO LEWISBG	NORTH LEWISBURG
326/937	PEEBLES	PEEBLES
326/937	PHILLIPSBG	PHILLIPSBURG
326/937	PIQUA	PIQUA
326/937	PITCHIN	PITCHIN
326/937	PLEASANTHL	PLEASANT HILL
326/937	PT WILLIAM	PORT WILLIAM
326/937	RAINSBORO	RAINSBORO
326/937	RAYMOND	RAYMOND
326/937	RIDGEWAY	RIDGEWAY
326/937	RIPLEY	RIPLEY
326/937	ROSEWOOD	ROSEWOOD
326/937	ROSSBURG	ROSSBURG
326/937	RUSHSYLVAN	RUSHSYLVANIA

NPA	Abbreviated Rate Center	Rate Center Full Name
326/937	RUSSELLSPT	RUSSELLS POINT
326/937	RUSSELLVL	RUSSELLVILLE
326/937	SABINA	SABINA
326/937	SARDINIA	SARDINIA
326/937	SEAMAN	SEAMAN
326/937	SIDNEY	SIDNEY
326/937	SINKINGSPG	SINKING SPRING
326/937	SO VIENNA	SOUTH VIENNA
326/937	SOCHARLETN	SOUTH CHARLESTON
326/937	SOUTHSOLON	SOUTH SOLON
326/937	SPRING VLY	SPRING VALLEY
326/937	SPRINGFLD	SPRINGFIELD
326/937	ST PARIS	ST PARIS
326/937	SUGRTRERDG	SUGAR TREE RIDGE
326/937	TERREHAUTE	TERRE HAUTE
326/937	TIPP CITY	TIPP CITY
326/937	TREMONT CY	TREMONT CITY
326/937	TROTWOOD	TROTWOOD
326/937	TROY	TROY
326/937	UNION CITY	UNION CITY
326/937	URBANA	URBANA
326/937	VANDALIA	VANDALIA
326/937	VERSAILLES	VERSAILLES
326/937	W LIBERTY	WEST LIBERTY
326/937	WALEXNDRIA	WEST ALEXANDRIA
326/937	WEST UNION	WEST UNION
326/937	WESTMILTON	WEST MILTON
326/937	WILMINGTON	WILMINGTON
326/937	WINCHESTER	WINCHESTER
326/937	WMANCHESTR	WEST MANCHESTER

NPA	Abbreviated Rate Center	Rate Center Full Name
326/937	WMANSFIELD	WEST MANSFIELD
326/937	WOODSTOCK	WOODSTOCK
326/937	XENIA	XENIA
326/937	YLSPGCLFTN	YELLOW SPRINGS CLIFTON
326/937	YORKCENTER	YORK CENTER

513 NPA - RELIEF ALTERNATIVES

OHIO

Numbering Plan Area Born on Date: 1947

NPA RELIEF PLANING TOOL ASSUMPTIONS

DELTA NRUF DATE..... June 17, 2021
PROJECTED EXHAUST DATE.....2Q2023
ANNUALIZED CODE DEMAND PROJECTION.....12
MONTHLY CO CODE DEMAND PROJECTION.....1.0
NXX Assignment dataJune 2021

CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA)	7 digits (NXX-XXX)
	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)

TRANSITION to 10-DIGIT DIALING for 988 as 3-DIGIT ACCESS to NATIONAL SUICIDE PREVENTION LIFELINE

Per NANPA Planning Letter PL-556, on July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022.¹ The Order requires covered providers to implement mandatory 10-digit dialing in NPAs that use both 7-digit dialing and 988 as an NXX. The 513 NPA is included in the requirements of this FCC order.

ACTION	TIME	DATE
Start of Network Preparation and Customer Education		July 16, 2020 (This starts the 9.5-month period prior to permissive dialing effective date for carriers to implement permissive 10-digit dialing in their networks and start educating customers about the upcoming dates.)

Start of permissive 10-digit dialing (“permissive 10-digit dialing effective date”)	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the “permissive dialing date” and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation.)
End of permissive dialing and start of mandatory 10-digit dialing (“mandatory 10-digit dialing effective date”)	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the “mandatory dialing date” and starts the 8.5-month period where carriers can start enforcing mandatory 10-digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing.)
Covered providers shall transmit all calls initiated by an end user dialing 988 to the current toll-free access number for the National Suicide Prevention Lifeline, presently 1-800-273-8255 (TALK)	12:01 am local time	July 16, 2022

During the permissive dialing period, subscribers may dial local calls on either a 7-digit or 10-digit basis but will be encouraged to dial 10 digits. After the permissive dialing period ends, all calls should be dialed using 10 digits. Carriers are strongly encouraged to prepare their switches to begin signaling 10 digits prior to the mandatory 10-digit dialing effective date for customers.

Concurrent with the mandatory 10-digit dialing effective date on **October 24, 2021**, the dialing plan will be as follows, unless the state/NPA has a different dialing plan.

OVERLAY DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) 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

NPA RELIEF ALTERNATIVES

OVERLAY ALTERNATIVE

ALTERNATIVE #1 - ALL SERVICES DISTRIBUTED OVERLAY

The 283 NPA would be assigned to the same geographic area occupied by the existing 513 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the 283 NPA will be assigned upon request with the effective date of the new 283 area code if all CO codes in the 513 NPA have been exhausted. At exhaust of the 513 NPA all future code assignments will be made in the overlay area code. The projected life would be:

Total CO Codes = 773

Total Rate Centers = 25

Area Code Life in Years = 59 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 513 NPA and 937/326 NPA codes would be eliminated and the 513 and 937/326 NPAs would be assigned to the same geographic areas occupied by the existing 513 and 937/326 NPAs. The 513 NPA and 937/326 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within the 513 affected area would be required. Available central office codes in the 937/326 NPA will be assigned upon request in the 513 NPA area with the effective date of the new area code boundary and available 513 NPA central office codes could be assigned upon request in the 937/326 NPA area. At exhaust of the 513 NPA, all future NXX code assignments will be made from the 937/326 NPA code supply of central office codes. The 937/326 NPA overlay complex has 123 rate centers and the projected exhaust is 2Q2067. Eliminating the boundary between the 513 NPA and 937/326 NPA would have a combined life of 25 years and would save one NPA. This would also reunite the 513 and 937/326 NPAs that were previously part of an NPA split in 1996.

513 NPA

Total CO Codes = 773

Total Rate Centers = 25

937/326 NPA

Total CO Codes 937 NPA = 782

Total CO Codes 326 NPA = 56

Total Rate Centers = 123

Combined Area Code Life in Years = 25 years

ALTERNATIVE #3 - NPA BOUNDARY ELIMINATION OVERLAY WITH ALL SERVICES DISTRIBUTED OVERLAY

The boundary between the existing 513 NPA and 937/326 NPA area would be eliminated and the new 283 NPA code would be assigned to the same geographic area occupied by the existing 513 and 937/326 NPAs with the effective date of the new area code boundary. The 513 NPA and 937/326 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within the 513 NPA affected area would be required. Available central office codes in the 937/326 will be assigned upon request in the 513 NPA area with the effective date of the new area code boundary and available 513 NPA central office codes could be assigned upon request in the 937/326 NPA area. At exhaust of the 513 and 937/326 NPAs all future code assignments will be made from the 283 NPA. The 513 NPA has 25 rate centers, and the projected exhaust date is 2Q2023. The 937/326 NPA overlay complex has 123 rate centers and the projected exhaust is 2Q2067. Eliminating the boundary between the 513 and 937/326 NPAs and adding an all services overlay over both geographic areas would have a combined life of 52 years. This would also reunite the 513 and 937/326 NPAs that were previously part of an NPA split in 1996.

The projected life would be:

513 NPA
Total CO Codes = 773

Total Rate Centers = 25

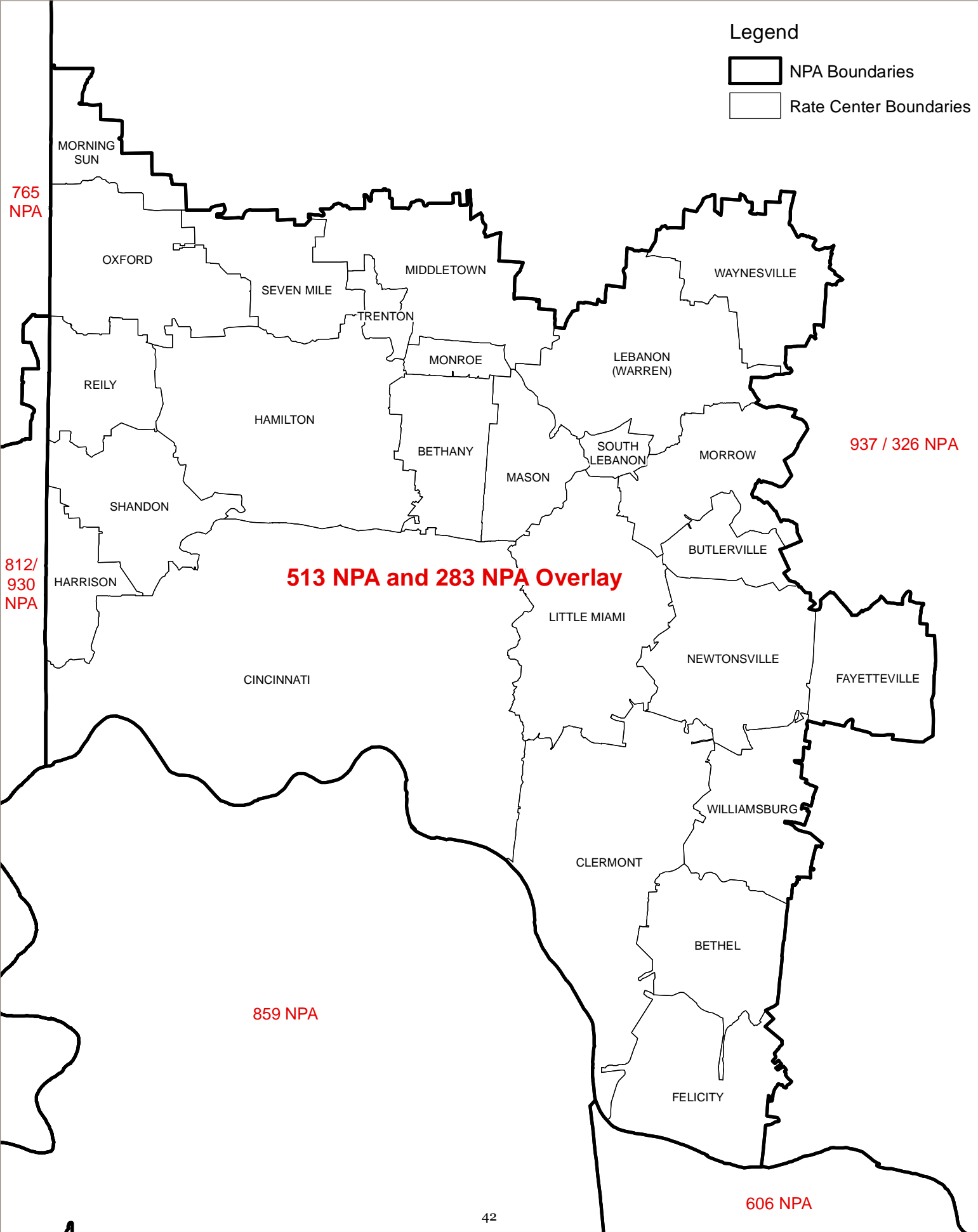
937/326 NPA
Total CO Codes 937 NPA = 782
Total CO Codes 326 NPA = 56
Total Rate Centers = 123

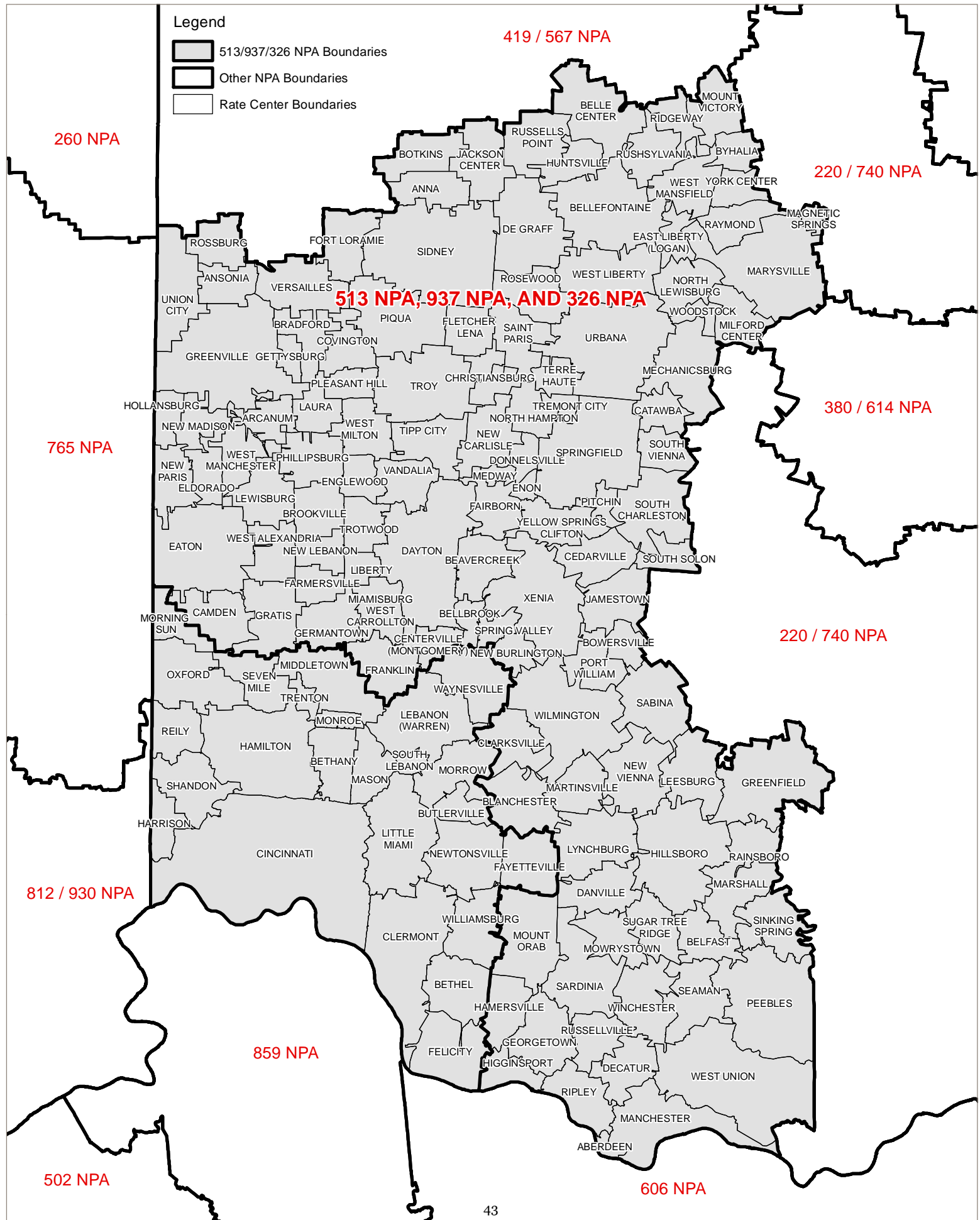
Combined Area Code Life in Years = 52 years

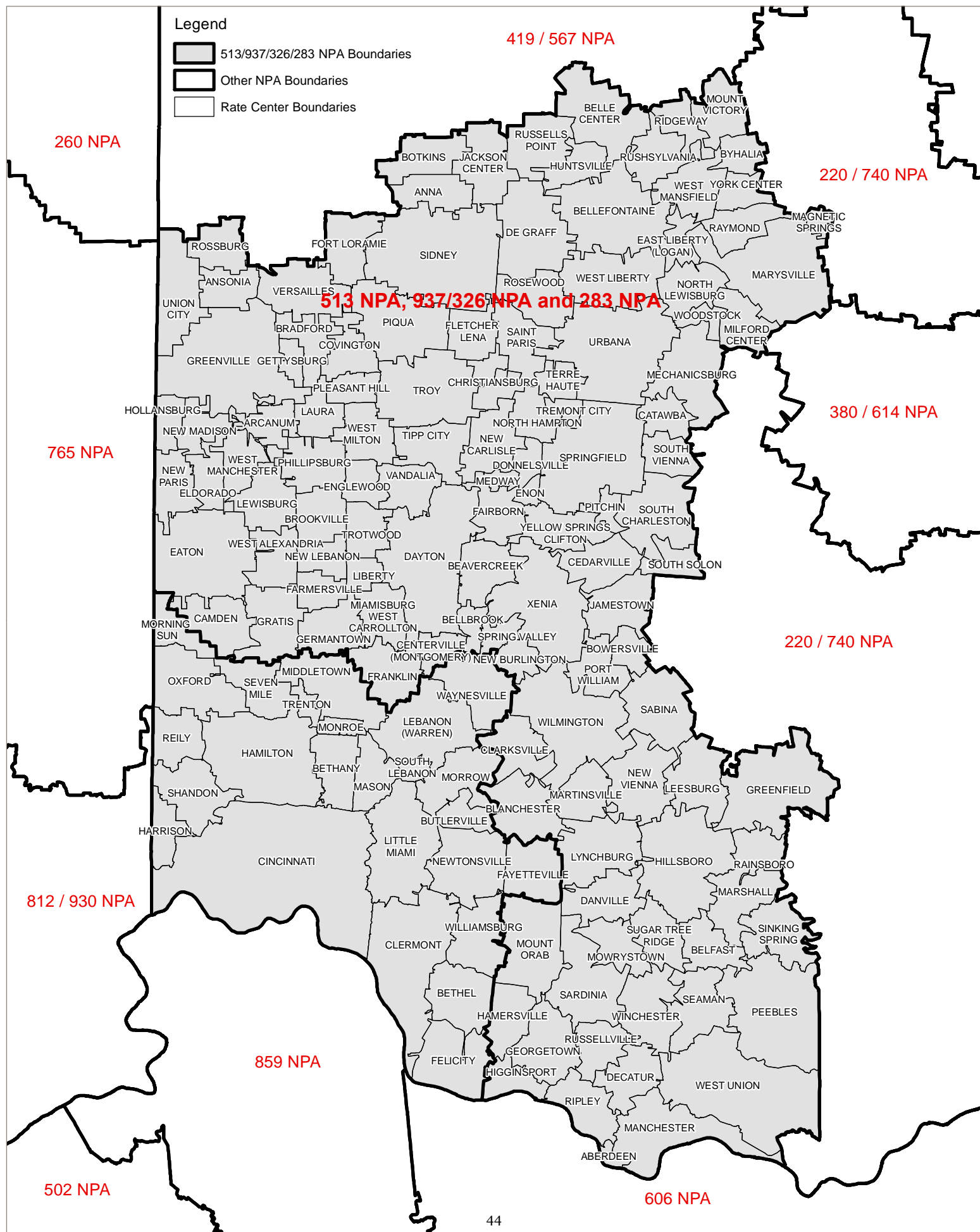
GEOGRAPHIC SPLIT ALTERNATIVE

Per Section 5.6.3 of the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061) an overlay is the only relief option of the 513 NPA.

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







This foregoing document was electronically filed with the Public Utilities

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Case No(s). 21-0873-TP-COI

Summary: Petition In the Matter of the Commission's Investigation Into Exhaust Relief for Area Code "513" electronically filed by Linda Hymans on behalf of Weber, Florence and McCabe, Cecilia