

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

ENTRY

Entered in the Journal on September 8, 2021

I. SUMMARY

{¶ 1} In this Entry, the Commission seeks comments regarding the "513" area code exhaust relief petition filed by SomosGov, Inc., in its role as the North American Numbering Plan Administrator, and overlay options outlined therein.

II. DISCUSSION

{¶ 2} Pursuant to its letter of February 5, 1998, docketed in Case No. 97-844-TP-COI, *In the Matter of the Commission's Investigation into Telephone Numbering and Number Assignment Procedures*, the Commission notified the North American Numbering Plan Administrator (NANPA) that it intended to retain its full area code (NPA) relief planning oversight authority. In accordance with its letter of March 18, 2013, docketed in Case No. 13-700-TP-COI, *In the Matter of the Commission's Investigation into Exhaust Relief for the Area Code "740,"* the Commission requested that the NANPA take over primary responsibility for NPA relief planning on a going forward basis. Notwithstanding this request, the Commission, consistent with 47 C.F.R. §52.19, continues to maintain the authority to review and approve NPA relief plans.

{¶ 3} On August 26, 2021, SomosGov, Inc. (SomosGov), in its role as the NANPA, filed a petition on behalf of the Ohio telecommunications industry for relief of the "513" NPA (Petition). SomosGov states that the April 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (the April 2021 NRUF Report) published by the NANPA indicated that, absent NPA relief, the supply of central office codes (NXXs) in the "513" NPA would exhaust during the second quarter of 2024. SomosGov further notes, however, that due to an increase in NXX code requests in the "513"

NPA, the NANPA declared jeopardy on June 17, 2021 and issued a “delta NRUF” which revised the estimated “513” NPA exhaust date to the second quarter of 2023.

{¶ 4} In its role of taking primary responsibility for NPA relief planning, the NANPA convened an industry NPA relief planning meeting via web conference on July 27, 2021, to discuss the proposed relief alternatives and to allow the Ohio telecommunications industry to arrive at a consensus on the relief alternative to be recommended to the Commission. During this meeting, the industry reviewed an Initial Planning Document (IPD), a copy of which is attached as Exhibit B to the Petition, which outlined three alternatives for relief: an all-services distributed overlay of the “513” NPA (Alternative 1); a boundary elimination overlay of the “513” and “937”/”326” NPAs (Alternative 2); and a boundary elimination overlay of the “513” and “937”/”326” NPAs with the addition of a new overlay NPA (Alternative 3). A copy of the July 27, 2021 meeting minutes, containing the full description of each overlay plan, as well as a discussion of pros and cons of each alternative, is attached to the Petition as Exhibit A.

{¶ 5} Under Alternative 1, 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 new “283” NPA would be assigned upon request with the effective date of the “283” NPA. At exhaust of the “513” NPA, all future codes would be made in the “283” NPA. Alternative 1 has a projected life of 59 years.

{¶ 6} Under Alternative 2, the boundary between the “513” NPA and the “937”/”326” NPA codes would be eliminated and the “513” NPA and the “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 the “937”/”326” NPA customers would retain their current telephone numbers, however, 10-digit dialing for all calls by all customers within the “513” NPA affected area would be required. Available NXX codes in the

“937”/“326” NPA would be assigned upon request in the “513” NPA area with the effective date of the new area code boundary and available “513” NPA NXXs could be assigned upon request in the “937”/“326” NPA area. At exhaust of the “513” NPA, all future NXX code assignments would be made from the “937”/“326” NPA supply of NXXs. Alternative 2 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.

{¶ 7} Under Alternative 3, the boundary between the “513” NPA and the “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, 10-digit dialing for all calls by all customers within the “513” NPA affected area would be required. Available NXX codes in the “937”/“326” areas would 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 would be assigned upon request in the “937”/“326” NPA area. At the exhaust of the “513” and “937”/“326” NPAs, all future code assignments would be made from the “283” NPA. Alternative 3 would reunite the “513” and “937”/“326” NPAs that were previously split in 1996. Alternative 3 has a projected life of 52 years.

{¶ 8} During the July 27, 2021 meeting, the industry discussed potential benefits of each alternative and ultimately reached consensus that Alternative 1, the all-services distributed overlay, should be the choice of relief. Alternative 1 was selected as the industry’s preferred form of relief due to its numerous positive features highlighted during these industry discussions, some of which are as follows:

- (a) All existing customers would retain the “513” area code and would not have to change their telephone numbers;

- (b) The plan does not discriminate against customers on different sides of a boundary line, as does a geographic split;
- (c) The plan will result in less customer confusion and an easier education process;
- (d) The plan will have less financial impact on business and residential customers because there is no need to update printed materials such as checks and websites, unless they only currently show a seven-digit number;
- (e) The plan will be easier for service providers to implement from a translations, billing, and service order system perspective;
- (f) The Commission would not have to decide which side gets the new NPA, so no “winners and losers”;
- (g) The plan will not split cities or counties into different area codes and, therefore, keeps communities of interest intact;
- (h) The plan will have no impact on wireless carriers that have to reprogram headsets manually;
- (i) The plan will have no technical impacts on number portability, text messaging, or multimedia messaging;
- (j) The plan will be easier to implement than a boundary elimination overlay; and
- (k) The plan will have a longer projected life than the boundary elimination overlay.

See Petition, Exhibit A at 6-7.

{¶ 9} The Petition further explains that by the time the new overlay proposed in Alternative 1 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 pertaining to the National Suicide Prevention Lifeline. To that end, the industry also set forth a recommended dialing plan for Alternative 1’s “513”/“283” all-services distributed overlay, which is outlined on page 6 of the Petition.

{¶ 10} Concurrent with its selection of Alternative 1, the industry also reached consensus to recommend a nine-month implementation schedule for the “283” NPA overlay. This schedule, outlined in the Petition, does not contain specific dates, but provides timeframes for the phases of implementation (Petition at 7). Specific dates will be determined at an initial implementation meeting that will be scheduled following the Commission’s consideration of the Petition. Finally, the NANPA notes 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.

{¶ 11} Consistent with the Commission’s most recent prior area code decisions, the Commission preliminarily determines that the recommendation of the Ohio telecommunications industry should be adopted absent an adequate demonstration to the contrary from any interested party *See, e.g., In re the Commission’s Investigation Into Exhaust Relief for Area Code “740,”* Case No. 13-700-TP-COI, Opinion and Order (Dec. 11, 2013); *In re the Commission’s Investigation Into Exhaust Relief for Area Code “937,”* Case No. 17-2329-TP-COI, Opinion and Order (May 23, 2018). Additionally, the Commission notes that on September 28, 2000, the Commission issued an Opinion and Order in Case No. 99-668-TP-COI, *In re the Commission Investigation into Exhaust Relief for Area Code “513”* directing 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. The Commission incorporates the record of Case No. 99-668-TP-COI in this proceeding.

{¶ 12} At this time, the Commission finds that interested persons shall have an opportunity to file comments relative to the relief alternatives outlined by the NANPA in the Petition. Initial comments must be filed in this docket by September 22, 2021. Reply comments shall be filed in this docket by October 4, 2021. The comments should state the above-captioned case number and be addressed to the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793. Electronic and facsimile options for filing comments are also available. Persons or entities seeking to file comments may contact the Commission's Docketing Division for assistance.

III. ORDER

{¶ 13} It is, therefore,

{¶ 14} ORDERED, That initial comments be filed in this proceeding by September 22, 2021 and that reply comments be filed by October 4, 2021. It is, further,

{¶ 15} ORDERED, That the record of Case No. 99-668-TP-COI be incorporated in this docket in accordance with Paragraph 11. It is, further,

{¶ 16} ORDERED, That a copy of this Entry be served upon the telephone industry listserv, the Ohio Telecom Association, the office of the Ohio Consumers' Counsel, and all parties and interested persons of record.

COMMISSIONERS:

Approving:

Jenifer French, Chair

M. Beth Trombold

Lawrence K. Friedeman

Dennis P. Deters

DMH/kck

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

Summary: Entry seeking comments regarding the "513" area code exhaust relief petition filed by SomosGov, Inc., in its role as the North American Numbering Plan Administrator, and overlay options outlined therein. electronically filed by Ms. Mary E. Fischer on behalf of Public Utilities Commission of Ohio