December 7, 2023

Via Email

Mr. Walter Thomas
Secretary
Alabama Public Service Commission
100 North Union Street., Suite 850
Montgomery, Alabama 36104

RE: *Petition of the North American Numbering Plan Administrator on behalf of the Alabama Telecommunications Industry for Approval of Relief for the 334 Numbering Plan Area*

Dear Mr. Thomas:

The North American Numbering Plan Administrator ("NANPA"), hereby submits a petition on behalf of the Alabama telecommunications industry for relief of the "334" Numbering Plan Area (NPA or area code).

If you have any questions regarding this filing, please contact me at at cmccabe@nanpa.com or 925-420-0130.

Respectfully Submitted,

Cecilia McCabe

Cecilia McCabe
NPA Relief Planner
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Before the
ALABAMA PUBLIC SERVICE COMMISSION
Montgomery, Alabama

Petition on Behalf of the Alabama Telecommunications Industry for Approval of Relief for the 334 Numbering Plan Area (NPA)	**)**	**Docket _____**

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

On behalf of the Alabama telecommunications industry ("Industry"),[1] 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 Alabama hereby notifies the Alabama Public Service Commission ("Commission")[2] that the 334 NPA is projected to exhaust its central office codes (often referred to as "CO" or "NXX" codes) during the third quarter of 2026 and is in need of relief.[3] This means that absent NPA relief, the supply of CO codes in the 334 NPA is projected to run out during the projected exhaust quarter.

The Industry recommends that it implement an all-services distributed overlay based upon a 13-month schedule that is completed at least six months prior to the

[1] The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 334 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] The October 2023 NRUF and NPA Exhaust Analysis ("October 2023 NRUF Report") can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.html.

projected exhaust of the 334 NPA[4] and respectfully requests that the Commission expeditiously approve the Industry's plan to implement an all-services distributed overlay as set forth herein.

I. Alabama NPA Background

The 205 NPA was the original NPA assigned in 1947 and served the entire state of Alabama until 1995 when the 334 NPA was created as the result of a geographic split. In 1998, the 205 NPA was split again, creating the 256 NPA. In 2000, the Commission approved a geographic split of the 334 NPA, creating the 251 NPA. The Commission approved an all-services distributed overlay of the 205 NPA in 2001 prompting the assignment of the 659 NPA. However, due to the implementation of number conservation measures, implementation of the 659 NPA was delayed until 2019. In 2009, the Commission approved an all-services distributed overlay of the 256 NPA, introducing the 938 NPA. Due to the Commission's suspension of the 205/659 NPA relief project, the 256/938 NPA was the first all-services distributed overlay implemented in Alabama.

Cities in the 334 NPA include but are not limited to Montgomery, Dothan, Auburn, Prattville, Phenix City, Enterprise, Opelika, Selma and many other smaller communities. The 334 NPA is bordered on the north by the Alabama 205/659 and 256/938 NPAs, to the east by the Georgia 706/762 and 229 NPAs, to the south by the Alabama 251 NPA and Florida 448/850 NPAs and to the west by the Alabama 205/659 and 251 NPAs.

[4] NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, December 4, 2023) ("NPA Relief Guidelines"), §5.1. The NPA Relief Guidelines can be accessed on the ATIS website located at https://access.atis.org/apps/group_public/documents.php?view=.

II. Description of Relief Alternatives

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. On October 17, 2023, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2023 NRUF Report") which indicated that the 334 NPA is projected to exhaust its CO codes during the third quarter of 2026.

NANPA convened an Industry NPA relief planning meeting via web conference on October 30, 2023.[5] During this meeting the Industry reviewed the Initial Planning Document ("IPD") which contained four alternatives for relief of the 334 NPA, including an all-services distributed overlay alternative, two geographic split options, and an NPA boundary elimination overlay alternative. After a thorough review of the pros and cons for the relief alternatives, the Industry reached consensus to recommend Alternative #1, the All Services Distributed Overlay of the 334 NPA. [6]

Following are the descriptions for each relief alternative that were reviewed and assessed by the Industry participants:

[5] The meeting notice with IPD, which was distributed to the Industry on September 29, 2023, is attached, as Exhibit A.

[6] The October 30, 2023, meeting minutes, which contains the pros and cons to each alternative, is attached as Exhibit B.

- **Alternative #1: An All-Services Distributed Overlay of the 334 NPA**

A new NPA would be assigned to the same geographic area occupied by the existing 334 NPA. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 334 NPA have been allocated. Customers would retain their current telephone numbers, and ten-digit local dialing would be required within and between the 334 NPA and the new overlay NPA. There are 96 rate centers in the 334 NPA and at the current assignment rate, the projected life of this alternative would be 44 years.

- **Alternative #2: A Geographic Split of the 334 NPA**

The 334 NPA would become two distinct geographic areas and a new NPA would be assigned to one of the areas formed by the split. The proposed boundary would split the 334 NPA resulting in the western section of the 334 NPA designated as Area A, and the eastern section designated as Area B, as shown in the Alternative #2 - 334 NPA Split Option Map.[7] Area A contains the larger cities of Montgomery, Prattville, Selma and many other smaller communities, while Area B contains the larger cities of Auburn, Phenix City, Tuskegee and many other smaller communities. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs.

At the current assignment rate, the projected lives for this alternative would be:

Area A	**Area B**
Total Rate Centers = 47	Total Rate Centers = 49
Area code life in years = 45	Area code life in years = 46

[7] See Exhibit A.

- **Alternative #3: A Geographic Split of the 334 NPA**

The 334 NPA would become two distinct geographic areas and a new NPA would be assigned to one of the areas formed by the split. The proposed boundary would split the 334 NPA with the northeastern section of the 334 NPA designated as Area A, and the eastern section designated as Area B, as shown in the Alternative #3 - 334 NPA Split Option Map.[8] Area A contains the larger cities of Montgomery, Prattville, Selma, Tuskegee and many other smaller communities, while Area B contains the larger cities of Auburn, Opelika, Phenix City and many other smaller communities. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs.

At the current assignment rate, the projected lives for this alternative would be:

Area A	**Area B**
Total Rate Centers = 40	Total Rate Centers = 56
Area code life in years = 48	Area code life in years = 43

- **Alternative #4: An NPA Boundary Elimination Overlay**

The NPA boundaries between the existing 334, 205/659, 251, and 256/938 NPAs ("six NPAs") would be eliminated and the six NPAs would occupy the entire state of Alabama. Customers within all NPAs would retain their current telephone numbers; however, ten-digit dialing would be required for all calls by customers within and between the six NPAs. The 334 NPA currently has 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to local dialing is required for the remaining NPAs because they are part of an overlay complex or, in the case of the

[8] Id.

251 NPA, it transitioned to ten-digit local dialing as a result of the implementation of the 988 abbreviated dialing code for the national 988 Suicide and Crisis Lifeline.

Available CO codes in the 205/659, 251, and 256/938 NPAs will be assigned upon request in the 334 area or any other area in Alabama with the effective date of the NPA boundary elimination, and available 334 NPA CO codes could be assigned upon request in the former 205/659, 251, or 256/938 NPA areas. At exhaust of the 334 NPA, all future CO code assignments will be made from the remaining 205/659, 251, and 256/938 NPAs supply of CO codes.

The 205/659 NPA has 70 rate centers, and the current projected exhaust is 4Q2044. The 251 NPA has 42 rate centers, and the current projected exhaust is 4Q2035. The 256/938 NPA has 91 rate centers, and the current projected exhaust is 3Q2043. Eliminating the boundary between all six NPAs would combine the 96 rate centers in the 334 NPA with the other rate centers in the state, resulting in a statewide overlay area with 299 rate centers. At the current assignment rate, this alternative has a life of only 15 years but could potentially save or delay the need for two NPAs based on the October 2023 exhaust projections and the combined life of the NPAs.

III. Description of the Recommended Relief Alternative

The Industry reached consensus to recommend approval for an All-Services Distributed Overlay as the relief method for the 334 NPA. The All-Services Distributed Overlay would add a new NPA over the same geographic area covered by the existing 334 NPA and is projected to last approximately 44 years. NANPA will assign CO codes from the new overlay NPA once all available CO codes from the 334 NPA are assigned. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. However, ten-digit local dialing

would be implemented in the 334 NPA.

The Industry recommends the All-Services Distributed Overlay in Alternative #1 for relief of the 334 NPA because it is the most consumer-friendly method of relief, allowing all existing customers to retain their current telephone numbers. In contrast, the other alternatives would have additional technical and customer education issues, that would complicate and prolong implementation. And the two geographic split options would require approximately half of the customers in the 334 NPA to change their telephone numbers. The All-Services Distributed Overlay avoids such issues and maintains the communities of interest for the 334 NPA because the geographic boundaries would not change.

The Industry-recommended dialing plan for the 334 NPA All-Services Distributed Overlay is set forth in the following table:

Dialing Plan for the 334 All-Services Distributed Overlay

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 dialing permissible at service provider's discretion

The Industry reached consensus to implement the new overlay NPA in accordance with a 13-month schedule. The schedule, outlined below, does not include specific dates, but rather timeframes to identify the different phases of implementation. Once the Commission has approved the relief plan, the Industry will select specific dates at an implementation meeting to ensure the milestone dates do not interfere with

certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission's prompt approval of the Petition and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

The Implementation Timeframe Schedule for the 334 All-Services Distributed Overlay

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within the 334 NPA can be dialed using 7 or 10 digits) Mandatory* 10-digit dialing starts at the end of the Permissive Dialing Period	6 months
First Code Activation after the start of Mandatory 10-digit dialing *(Effective date for CO codes from the new NPA) **	1 month (after Mandatory Dialing starts)
Total Implementation Interval	13 months

** CO codes in the new NPA will not be assigned until all available CO codes in the existing 334 NPA are allocated.*

After the Commission issues a final decision, NANPA will take approximately 75 days to assign the new NPA, work with the Commission to issue a press release announcing the new NPA, schedule and facilitate an Industry implementation meeting, and publish a Planning Letter.[9] The Industry will then form a committee to begin implementation of the new area code approximately 19 months prior to exhaust of the 334 NPA.[10]

The following tables outline the methods and processes the Industry typically

[9] NPA Relief Guidelines §5.10.1.

[10] A total of 19 months is needed to complete a 13-month implementation schedule at least 6 months prior to the exhaust of the 334 NPA.

utilizes for implementation of an initial overlay; however, the methods and processes outlined below may be modified by agreement of the Industry members during the actual implementation meetings:

Customer Education Milestones:

	Action	**Responsibility**
1	Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2	Issue initial press release	State Commission and all Service Providers (optional to Service Providers)
3	Send Special letters to PSAPs, Alarm & Safety, Pay Telephone, and Directory Publishers	Industry committee co-chairs
4	Update social media with information regarding new overlay NPA.	All Service Providers & NANPA (optional)
5	Update websites with information regarding new overlay NPA	All Service Providers
6	Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	Directory Publishers
	After Permissive 7 and 10-Digit Dialing Begins	
7	Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
8	Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	Industry committee co-chairs
9	Update social media with information regarding new overlay NPA.	All Service Providers & NANPA (optional)
10	Update websites with information regarding new overlay NPA	All Service Providers
11	Issue second mandatory press release just prior to the mandatory dialing date and/or new overlay NPA's effective date	Commission and Service Providers that have the ability (If necessary)

Technical Milestones:

	Action	**Responsibility**
1	Obtain industry test code from NANPA and activate the test number.	One Service Provider volunteer

	Action	Responsibility
2	Open the test code in carriers' network.	All Service Providers
3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	All Service Providers
4	Ensure Highway boxes are programmed with 10-digit dialing	Industry committee co-chairs
5	Network ready for Permissive Dialing	All Service Providers
6	Create Permissive Dialing Industry Contact List	Industry committee co-chairs
	Permissive Dialing Begins	
7	Establish NPA Specific type of Trunks	All Service Providers (as needed)
8	Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Service Providers
11	Recorded announcements in Place and Tested	All Service Providers
	E911 Work Plan	
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13	Ensure SRDB table has new NPA built in	E911 Providers
14	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15	Notify Statewide Coordinator	Industry committee co-chairs
16	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
17	Update PSAP equipment to recognize new NPA	PSAPs
18	Trunk Orders Complete	E911 Providers
19	Build E911 Network/Tandem Translations	E911 Providers
20	Verify if all PSAP work has been completed	PSAPs
21	Activate E911 Network/Tandem Translations	E911 Providers

IV. Conclusion

The Industry requests that the Commission issue an order in response to this Petition approving the All-Services Distributed Overlay relief plan for the 334 NPA and the recommended implementation schedule without a hearing. To the extent possible, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this Petition, the Industry will implement an all-services distributed overlay over the 334 NPA in accordance with the 13-month implementation schedule set forth above. As such, the Industry respectfully requests that the Commission issue a final decision on this Petition no later than August 31, 2024.

Respectfully submitted,

Cecilia McCabe
NPA Relief Planner
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East Brunswick, NJ 08816
925-420-0130
cmccabe@nanpa.com

December 7, 2023

EXHIBIT A

September 29, 2023

To: All 334 NPA Code Holders and Interested Industry Members (Alabama)

Subject: Alabama 334 NPA Initial Planning Document Review Meeting

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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 2023 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("April 2023 NRUF Report"), published by NANPA, indicated that the 334 NPA would exhaust during the third quarter of 2026. Relief planning for the 334 NPA is to start in the third quarter of 2023.

Accordingly, on October 30, 2023, NANPA will convene an industry NPA relief planning meeting via web conference to review the initial planning document ("IPD") and develop a recommended relief plan for the 334 NPA. The objective of this meeting is to reach consensus among members of the Alabama Telecommunications Industry ("Industry") on a single relief plan for the 334 NPA. The resulting relief plan will be filed in a petition with the Alabama Public Service Commission ("Commission") for their consideration and approval. The industry-recognized consensus process developed by the Alliance for Telecommunications Industry Solutions ("ATIS") will be applied in the decision-making efforts.

Included with this meeting notice is the meeting agenda, consensus process, 334 NPA Central Office ("CO") code and thousands-block status reports, relief planning meeting aids, service provider CO code assignments by OCN, rate centers in the 334 NPA, and associated maps. Because there are relief alternatives outlined in this notice that include the 205/659, 251 and 256/938 NPAs, the thousands-block statistics, CO code summaries, Service Provider CO code assignments by OCN, and rate center data are also included for these NPAs.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on October 30, 2023. This may be the only Industry meeting before a decision is reached on a recommended relief plan that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Monday, October 30, 2023
Time: 2:00 pm, ET; 1:00 pm CT; 12:00 pm MT; 11:00 am PT

Join Zoom Meeting
https://somos.zoom.us/j/83694278127?pwd=dTVWVE1nUitHcktHKzJnajRneWFNZz09&from=addon

Meeting ID: 836 9427 8127
Password: 396715

One tap mobile
8884754499,,83694278127# US Toll-free
8778535257,,83694278127# US Toll-free

Dial by your location
888 475 4499 US Toll-free
877 853 5257 US Toll-free
Meeting ID: 836 9427 8127

Please feel free to distribute this notice to others within the Industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 334 NPA relief project, please sign up for NANPA's NAS-NNS by going to www.nationalnanpa.com, select NAS Login, then New Registration, and complete the sign-up process.

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

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Dee Newman – Alabama Public Utility Commission
Jeff Johnson – Alabama Public Utility Commission
David Peeler – Alabama Public Utility Commission

Alabama 334 NPA
Initial Relief Planning Meeting
via Web Conference

October 30, 2023 - 1:00 PM (CT)

AGENDA

Welcome, Introductions, Consensus Definition

NANPA's Role and Responsibilities

Review INC Guidelines

Review 334 NPA Background and History

Review 334, 251, 205/659 and 256/938 Status

Review Initial Planning Document and Proposed Alternatives

Review Relief Alternatives Pros and Cons

Consensus on Relief Alternative

Consensus on Implementation Interval

Consensus con Customer Education and Technical 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.

5 NPA Relief Planning Process

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

Considerations in the NPA Relief Planning Process include:

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

b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, expansion of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.

c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.

d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.

e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.

f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit local dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.[1]

g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.[2] Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives

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

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

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

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

5.1 Determine the Expected NPA Exhaust Period

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

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

5.2 Identify the Alternative Relief Methods Available

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

5.3 Define the Attributes of Each Alternative or Method

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

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

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

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

Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration[3]. 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.

6 Alternative Relief Methods

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

6.1 NPA Split Method

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

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

6.2 Boundary Realignment Method

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

6.3 All-Services Distributed Overlay Method[4]

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

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

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 available 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 a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs, and may require a longer implementation interval.

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

[5] 47 CFR §52.19 (c) (3) (ii).

7 Other Relief Planning Considerations

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

7.1 Regulatory Involvement

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

7.2 Timing and Schedules

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

Annex B

Issues To Be Considered During NPA Relief Planning

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

Subscribers

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

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements

- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks
- LNP compliance impacts

Industry Concerns

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

Annex E

General Attributes of the Most Common Relief Alternatives

Geographic Splits	All-Services Overlays
• Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area.	• With an overlay there will be more than one area code in a geographic area.
• Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.	• An overlay will not require existing customers to change their area code.
• Geographic splits permit 7-digit dialing within an area code.	• An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
• Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code.	• There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.

• Future splits will reduce the geographic size of the area code.	• An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

NANPA
North American Numbering Plan Administrator

Relief Planning Meeting Aid
Pros and Cons for Relief Alternatives

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

Overlay Pros and Cons:

Pros:

Alternative #					
					1 All existing customers would retain the 334 area code and would not have to change their telephone number.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split.
					3 Less customer confusion and easier education process.
					4 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
					5 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					6 No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split.
					7 Minimizes call routing issues, especially with ported numbers.
					8 Easier for service providers to implement from a translations, billing and service order system perspective.
					9 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table.
					10 The Commission would not have to decide which side retains the 334 NPA as would be required for an NPA split.
					11 Does not split cities, counties or communities of interest into different area codes.
					12 Does not impact some wireless carriers that have to reprogram handsets manually as would be required for an NPA split.
					13 No technical impacts to number portability, text messaging or multimedia messaging.
					14 An all-services distributed overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice as would be required for a split.
					15 Helps move customers toward nationwide 10-digit dialing.
					16 Transitioning to 10-digit local dialing will enable central office codes protected for 7-digit routes to be released for assignment.

Relief Planning Meeting Aid
Pros and Cons for Relief Alternatives

Overlay Pros and Cons:

Cons:

Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 334 NPA and the new overlay NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.).
					4 Loss of geographic identity with an overlay if assigned a telephone number in the new overlay NPA.
					5 Confusion due to differences in state dialing requirements between local and toll calling; customers dialing 10 digit vs 1+10-digit for local calls.

NPA Split Pros and Cons

Pros:

Alternative #					
					1 Maintains seven-digit dialing for local calls within the same NPA.
					2 Approximately half of the customers would not experience a change if they keep the 334 NPA.
					3 Projected lives are balanced.
					4 The projected lives are slightly more balanced than Alternative #.
					5 This alternative allows _____ to maintain operations on one side of the split line.
					6 Maintains geographic identity of the 334 area code.
					7 Keeps the rate centers on both sides of the split lines intact.

NANPA
North American Numbering Plan Administrator

Relief Planning Meeting Aid
Pros and Cons for Relief Alternatives

NPA Split Pros and Cons:

Cons:

Alternative #					
					1 Requires approximately half of 334 NPA customers to change their area code.
					2 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers.
					3 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
					4 All 334 NPA customers previously went through a split 21 years ago and half will have to change their area code again.
					5 Difficult Commission decision on which side retains the 334 NPA.
					6 Longer time period needed for service providers to implement this type of relief.
					7 Customers whose numbers change must contact friends, family and business associates with the telephone number changes.
					8 More complicated and costly to implement for service providers in their billing, translations and database systems.
					9 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
					10 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
					11 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
					12 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
					13 Split requires significant challenges to service provider's operational support systems and network elements.
					14 Splits cause customer confusion with caller ID during implementation.
					15 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					16 Splits require the 334 NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					17 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					18 Splits require the 800/SMS database to be updated.

					19 Splits reduce the geographic area served by one area code.
					20 Splits the city(s), counties or legislative districts into different area codes.
					21 Splits communities of interest.
					22 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the 334 area code during permissive dialing.
					23 The last split implemented was in 2007. There is additional complexity to implement a split now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.
					24 This split disrupts the SP's host-remote switch arrangement.
					25 Splits _____operating territory between two NPAs.
					26 _____EAS calling is heavily disrupted.

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 the X NPA to dial 10 digits where otherwise they wouldn't be subjected to NPA Relief for another X 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) (including Extended Area Service (EAS) calls)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

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

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

**CO codes in the new NPA will not be assigned until all available codes in the Exsiting 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 *(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)* Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation *(Effective date for codes from the new NPA)*	End of Recording Period
Total Implementation Interval	15 months

Relief Planning Meeting Aid
Customer Education and Technical Milestones

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

Customer Education Milestones:

			Responsibility
		1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding new overlay NPA.	
		5 Update websites with information regarding new overlay NPA	
		6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	
		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 reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	
		9 Update social media with information regarding new overlay NPA.	
		10 Update websites with information regarding new overlay NPA	
		11 Issue second mandatory press release just prior to the new overlay NPA's effective date	

Relief Planning Meeting Aid
Customer Education and Technical Milestones

Technical Milestones:

				Responsibility
		1	Obtain industry test code from NANPA and activate the test number	
		2	Open the test code in carriers' network	
		3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc	
		4	Ensure Highway boxes are programmed with 10-digit dialing	
		5	Network ready for Permissive Dialing	
		6	Create Permissive Dialing Industry Contact List	
			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	
			E911 Work Plan	
		12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	
		13	Ensure SRDB table has new NPA built	
		14	Notify PSAPs, PSALI customers and County Coordinators	
		15	Review and Submit CLEC Trunk Order Requests to local provider if needed	
		16	Update PSAP equipment to recognize new NPA	

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

The above are the typical milestones necessary for implementation of a {relief type}; however, these may need to be modified during the actual implementation.

AL 334 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
334	ABBEVILLE	ABBEVILLE
334	ALBERTA	ALBERTA
334	ANDALUSIA	ANDALUSIA
334	ARITON	ARITON
334	ARLINGTON	ARLINGTON
334	ASHFORD	ASHFORD
334	AUBURN	AUBURN
334	BANKS	BANKS
334	BRANTLEY	BRANTLEY
334	BRUNDIDGE	BRUNDIDGE
334	CAMDEN	CAMDEN
334	CATHERINE	CATHERINE
334	CLAYTON	CLAYTON
334	CLIO	CLIO
334	COLUMBIA	COLUMBIA
334	COTTONWOOD	COTTONWOOD
334	DALEVILLE	DALEVILLE
334	DEMOPOLIS	DEMOPOLIS
334	DIXONS ML	DIXONS MILLS
334	DOTHAN	DOTHAN
334	DOZIER	DOZIER
334	ECHO	ECHO
334	ECLECTIC	ECLECTIC
334	ELBA	ELBA
334	ENTERPRISE	ENTERPRISE
334	EUFAULA	EUFAULA
334	FLORALA	FLORALA
334	FORESTHOME	FOREST HOME
334	FORT DAVIS	FORT DAVIS
334	FREDONIA	FREDONIA
334	FT DEPOSIT	FORT DEPOSIT

AL 334 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
334	GANTT	GANTT
334	GENEVA	GENEVA
334	GEORGIANA	GEORGIANA
334	GORDON	GORDON
334	GORDONSVL	GORDONSVILLE
334	GOSHEN	GOSHEN
334	GREENSBORO	GREENSBORO
334	GREENVILLE	GREENVILLE
334	HARTFORD	HARTFORD
334	HAYNEVILLE	HAYNEVILLE
334	HEADLAND	HEADLAND
334	HOLTVILLE	HOLTVILLE
334	HUGULEY	HUGULEY
334	HURTSBORO	HURTSBORO
334	KINSTON	KINSTON
334	KOWALIGA	KOWALIGA
334	LAFAYETTE	LAFAYETTE
334	LANGDALE	LANGDALE
334	LAPINE	LAPINE
334	LINDEN	LINDEN
334	LOUISVILLE	LOUISVILLE
334	LOWNDESBO	LOWNDESBORO
334	LUVERNE	LUVERNE
334	MAPLESVL	MAPLESVILLE
334	MARION	MARION
334	MCKENZIE	MCKENZIE
334	MIDLAND CY	MIDLAND CITY
334	MIDWAY	MIDWAY
334	MONTGOMERY	MONTGOMERY
334	NANAFALIA	NANAFALIA
334	NEWBROCKTN	NEW BROCKTON

AL 334 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
334	NEWTON	NEWTON
334	NEWVILLE	NEWVILLE
334	NOTASULGA	NOTASULGA
334	OAKLAND	OAKLAND (CHAMBERS)
334	OPELIKA	OPELIKA
334	OPP	OPP
334	ORRVILLE	ORRVILLE
334	OZARK	OZARK
334	PEROTE	PEROTE
334	PHENIXCITY	PHENIX CITY
334	PINE HILL	PINE HILL
334	PINE LEVEL	PINE LEVEL
334	PRATTVILLE	PRATTVILLE
334	RAMER	RAMER
334	RED LEVEL	RED LEVEL
334	ROANOKE	ROANOKE
334	ROCK MILLS	ROCK MILLS
334	SAMSON	SAMSON
334	SELMA	SELMA
334	SHAWMUT	SHAWMUT
334	SLOCOMB	SLOCOMB
334	SWEETWATER	SWEET WATER
334	TALLASSEE	TALLASSEE
334	THOMASTON	THOMASTON
334	THOMASVL	THOMASVILLE
334	TROY	TROY
334	TUSKEGEE	TUSKEGEE
334	UNION SPG	UNION SPRINGS
334	UNIONTOWN	UNIONTOWN
334	VREDENBG	VREDENBURGH
334	WEST POINT	WEST POINT

AL 334 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
334	WETUMPKA	WETUMPKA
334	WICKSBURG	WICKSBURG
334	WING	WING

AL 205/659 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
205/659	ALABASTER	ALABASTER
205/659	ALICEVILLE	ALICEVILLE
205/659	ASHVILLE	ASHVILLE
205/659	BERRY	BERRY
205/659	BESSEMER	BESSEMER
205/659	BIRMINGHAM	BIRMINGHAM
205/659	BLOUNTSVL	BLOUNTSVILLE
205/659	BRILLIANT	BRILLIANT
205/659	BUTLER	BUTLER
205/659	CALERA	CALERA
205/659	CARBONHILL	CARBON HILL
205/659	CARROLLTON	CARROLLTON
205/659	CENTREVL	CENTREVILLE
205/659	CHELSEA	CHELSEA
205/659	CLANTON	CLANTON
205/659	COLUMBIANA	COLUMBIANA
205/659	CORDOVA	CORDOVA
205/659	DETROIT	DETROIT
205/659	DORA	DORA
205/659	DOUBLE SPG	DOUBLE SPRINGS
205/659	ETHELSVL	ETHELSVILLE
205/659	EUTAW	EUTAW
205/659	FAYETTE	FAYETTE
205/659	FLATWOOD	FLATWOOD
205/659	GARDENDALE	GARDENDALE
205/659	GORDO	GORDO
205/659	GRAYSVILLE	GRAYSVILLE
205/659	GUIN	GUIN
205/659	HACKLEBURG	HACKLEBURG
205/659	HALEYVILLE	HALEYVILLE
205/659	HAMILTON	HAMILTON

AL 205/659 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
205/659	JASPER	JASPER
205/659	JEMISON	JEMISON
205/659	KENNEDY	KENNEDY
205/659	LEEDS	LEEDS
205/659	LINCOLN	LINCOLN
205/659	LISMAN	LISMAN
205/659	LIVINGSTON	LIVINGSTON (SUMTER)
205/659	LYNN	LYNN
205/659	MILLPORT	MILLPORT
205/659	MONTEVALLO	MONTEVALLO
205/659	MOUNDVILLE	MOUNDVILLE
205/659	NAUVOO	NAUVOO
205/659	NECTAR	NECTAR
205/659	NEEDHAM	NEEDHAM
205/659	OAKMAN	OAKMAN
205/659	ODENVILLE	ODENVILLE
205/659	ONEONTA	ONEONTA
205/659	PANOLA	PANOLA
205/659	PARRISH	PARRISH
205/659	PELL CITY	PELL CITY
205/659	PENNINGTON	PENNINGTON
205/659	PHILCMPBLL	PHIL CAMPBELL
205/659	PINSON	PINSON
205/659	RAGLAND	RAGLAND
205/659	REFORM	REFORM
205/659	SNEAD	SNEAD
205/659	SPRINGVL	SPRINGVILLE
205/659	SULLIGENT	SULLIGENT
205/659	SURFSIDE	SURFSIDE
205/659	THORSBY	THORSBY
205/659	TRUSSVILLE	TRUSSVILLE

AL 205/659 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
205/659	TUSCALOOSA	TUSCALOOSA
205/659	VERNON	VERNON
205/659	VINCENT	VINCENT
205/659	W BLOCTON	WEST BLOCTON
205/659	WALNUT GRV	WALNUT GROVE
205/659	WARRIOR	WARRIOR
205/659	WINFIELD	WINFIELD
205/659	YORK	YORK

AL 251 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
251	ATMORE	ATMORE
251	BAYMINETTE	BAY MINETTE
251	BAYOUBATRE	BAYOU LA BATRE
251	BEATRICE	BEATRICE
251	BELLEFONTN	BELLE FONTAINE
251	BREWTON	BREWTON
251	CASTLEBRY	CASTLEBERRY
251	CHATOM	CHATOM
251	CITRONELLE	CITRONELLE
251	CLEAR SPG	CLEAR SPRINGS
251	COFFEEVL	COFFEEVILLE
251	DAUPHIN IS	DAUPHIN ISLAND
251	DEER PARK	DEER PARK
251	EVERGREEN	EVERGREEN
251	EXCEL	EXCEL
251	FAIRHOPE	FAIRHOPE
251	FINCHBURG	FINCHBURG
251	FLOMATON	FLOMATON
251	FOLEY	FOLEY

AL 251 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
251	FOWL RIVER	FOWL RIVER
251	FRANKVILLE	FRANKVILLE
251	FRISCOCITY	FRISCO CITY
251	FRUITDALE	FRUITDALE
251	GILBERTOWN	GILBERTOWN
251	GOSPORT	GOSPORT
251	GRAND BAY	GRAND BAY
251	GROVE HILL	GROVE HILL
251	HUXFORD	HUXFORD
251	IRNGTNSTEL	IRVINGTON ST ELMO
251	JACKSON	JACKSON
251	MCCULLOUGH	MCCULLOUGH
251	MCINTOSH	MCINTOSH
251	MELVIN	MELVIN
251	MILLRY	MILLRY
251	MOBILE	MOBILE
251	MONROEVL	MONROEVILLE
251	MT VERNON	MOUNT VERNON (MOBILE)
251	PETERMAN	PETERMAN
251	PINE APPLE	PINE APPLE
251	REPTON	REPTON
251	SILAS	SILAS
251	URIAH	URIAH

AL 256/938 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
256/938	ALBERTVL	ALBERTVILLE
256/938	ALEXANDRCY	ALEXANDER CITY
256/938	ANNISTON	ANNISTON
256/938	ARAB	ARAB

AL 256/938 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
256/938	ARDMORE	ARDMORE
256/938	ARONEY	ARONEY
256/938	ASHLAND	ASHLAND
256/938	ATHENS	ATHENS
256/938	ATTALLA	ATTALLA
256/938	BOAZ	BOAZ
256/938	BRIDGEPORT	BRIDGEPORT
256/938	BRYANT	BRYANT
256/938	CAMP HILL	CAMP HILL
256/938	CEDARBLUFF	CEDAR BLUFF
256/938	CENTRE	CENTRE
256/938	CHEROKEE	CHEROKEE
256/938	CHILDERSBG	CHILDERSBURG
256/938	CHULAFINNE	CHULAFINNEE
256/938	COLLINSVL	COLLINSVILLE
256/938	COURTLAND	COURTLAND
256/938	CROSSVILLE	CROSSVILLE
256/938	CULLMAN	CULLMAN
256/938	DADEVILLE	DADEVILLE
256/938	DECATUR	DECATUR
256/938	DELTA	DELTA
256/938	ELKMONT	ELKMONT
256/938	FALKVILLE	FALKVILLE
256/938	FLAT ROCK	FLAT ROCK
256/938	FLORENCE	FLORENCE
256/938	FORT PAYNE	FORT PAYNE
256/938	FRANCISCO	FRANCISCO
256/938	FRUITHURST	FRUITHURST
256/938	FYFFE	FYFFE
256/938	GADSDEN	GADSDEN
256/938	GAYLESVL	GAYLESVILLE

AL 256/938 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
256/938	GERALDINE	GERALDINE
256/938	GOODWATER	GOODWATER
256/938	GRANT	GRANT
256/938	GRAYSON	GRAYSON
256/938	GUNTERSVL	GUNTERSVILLE
256/938	GURLEY	GURLEY
256/938	HANCEVILLE	HANCEVILLE
256/938	HARTSELLE	HARTSELLE
256/938	HAZELGREEN	HAZEL GREEN
256/938	HEFLIN	HEFLIN
256/938	HENAGAR	HENAGAR
256/938	HUNTSVILLE	HUNTSVILLE
256/938	JACKSONVL	JACKSONVILLE
256/938	KILLEN	KILLEN
256/938	LECTA	LECTA
256/938	LEESBURG	LEESBURG
256/938	LEIGHTON	LEIGHTON
256/938	LEXINGTON	LEXINGTON
256/938	LINEVILLE	LINEVILLE
256/938	MADISON	MADISON
256/938	MASSEY	MASSEY
256/938	MENTONE	MENTONE
256/938	MORGANCITY	MORGAN CITY
256/938	MOULTON	MOULTON
256/938	MRNSCRSRDS	MORRISONS CROSS ROADS
256/938	MUNFORD	MUNFORD
256/938	NEW HOPE	NEW HOPE
256/938	NEW MARKET	NEW MARKET
256/938	ODEN RIDGE	ODEN RIDGE
256/938	OHATCHEE	OHATCHEE
256/938	OWNSCRSRDS	OWENS CROSS ROADS

AL 256/938 Rate Center List		
NPA	**Abbreviated Rate Center**	**Rate Center Full Name**
256/938	PIEDMONT	PIEDMONT
256/938	PISGAH	PISGAH
256/938	RAINSVILLE	RAINSVILLE
256/938	RANBURNE	RANBURNE
256/938	RED BAY	RED BAY
256/938	RINEHART	RINEHART
256/938	ROCKFORD	ROCKFORD
256/938	ROGERSVL	ROGERSVILLE
256/938	RUSSELLVL	RUSSELLVILLE
256/938	SAND ROCK	SAND ROCK
256/938	SCOTTSBORO	SCOTTSBORO
256/938	SECTION	SECTION
256/938	SHEFFIELD	SHEFFIELD
256/938	SKYLINE	SKYLINE
256/938	STEVENSON	STEVENSON
256/938	SYLACAUGA	SYLACAUGA
256/938	TALLADEGA	TALLADEGA
256/938	TOWN CREEK	TOWN CREEK
256/938	UNIONGROVE	UNION GROVE
256/938	VALLEYHEAD	VALLEY HEAD
256/938	VETO	VETO
256/938	WADLEY	WADLEY
256/938	WEDOWEE	WEDOWEE
256/938	WHORTON	WHORTON
256/938	WOODLAND	WOODLAND

ALABAMA 334 CO CODE HOLDERS	
Company	**OCN**
AIRUS, INC. - AL	476H
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - AL	072F
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417
BRIGHT HOUSE NTWS INFORMATION SVCS (ALABAMA) - AL	336E
BUTLER TEL. CO., INC.	0284
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AL	6804
CENTURYLINK COMMUNICATIONS LLC - AL	327A
CENTURYLINK COMMUNICATIONS LLC - AL	7451
CENTURYLINK COMMUNICATIONS, LLC	508J
CENTURYTEL TEL AL LLC (NORTHERN) DBA CENTURYLINK	9789
CENTURYTEL TEL AL LLC (SOUTHERN) DBA CENTURYLINK	9788
CHARTER FIBERLINK - ALABAMA, LLC - AL	349D
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	0294
CSC WIRELESS, LLC	425J
DELTACOM, INC. - AL	4615
DISH WIRELESS, LLC	490J
FRACTEL, LLC	965H
FRONTIER COMMUNICATIONS OF THE SOUTH, LLC - AL	4464
HAYNEVILLE FIBER TRANSPORT, INC. - AL	753A
HAYNEVILLE TEL. CO., INC.	0299
IP HORIZON LLC	515J
KNOLOGY OF THE VALLEY, INC.	0371
KNOLOGY TOTAL COMMUNICATIONS, INC.	0295
LEVEL 3 COMMUNICATIONS, LLC - AL	5255
LEVEL 3 TELECOM OF ALABAMA, LLC - AL	7327
MCC TELEPHONY OF THE SOUTH, LLC - AL	773F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - AL	7221
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - AL	7469
METROPCS, INC.	5562
MON-CRE TEL. COOP., INC.	0305
NETWORK TELEPHONE CORPORATION - AL	9236
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NUSO, LLC	551G

NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - AL	604E
PEERLESS NETWORK OF ALABAMA, LLC - AL	143J
PINE BELT BROADCASTING DBA PINE BELT TEL COMP SVCS	9736
PINE BELT CELLULAR, INC.	4260
PINE BELT TEL. CO., INC.	0315
POWERTEL BIRMINGHAM LICENSES, INC.	7475
RADIANTIQ LLC	566J
ROANOKE TEL. CO., INC.	0317
SOUTHERN COMMUNICATIONS SERVICES, INC.	6744
SPRINT SPECTRUM, L.P.	6664
TELEPORT COMMUNICATIONS AMERICA, LLC - AL	8271
TELNYX LLC	073H
TIME WARNER CABLE INFO SVCS (ALABAMA),LLC - AL	694F
TON80 COMMUNICATIONS, LLC	516J
TROY CABLEVISION, INC. - AL	208D
TWILIO INTERNATIONAL, INC.	506J
UNION SPRINGS TEL. CO., INC.	0322
US LEC OF ALABAMA, INC.	4839
USA MOBILITY WIRELESS, INC.	6630
VALLEY TELEPHONE CO., LLC	0324
VONAGE AMERICA LLC	197D
WINDSTREAM ALABAMA, INC.	0302
WINDSTREAM NUVOX, INC.	8660
WOW! INTERNET, CABLE AND PHONE	961J
YMAX COMMUNICATIONS CORP. - AL	348E

Alabama 334 Block holders with No CO Codes Assigned

Company	OCN
CORETEL ALABAMA, INC. - AL	476F

ALABAMA 205/659 CO CODE HOLDERS	
Company	**OCN**
AIRESPRING, INC.	996H
AIRUS, INC. - AL	476H
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - AL	072F
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BELLSOUTH TELECOMMUNICATIONS, INC.	2741
BLOUNTSVILLE TELEPHONE LLC	0282
BRIGHT HOUSE NTWS INFORMATION SVCS (ALABAMA) - AL	336E
BROADRIVER COMMUNICATION CORPORATION - GA	0173
BUTLER TEL. CO., INC.	0284
CALLIS COMMUNICATIONS, INC. - AL	736D
CALLWORKS CORPORATION	475J
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AL	6804
CELLULAR SOUTH, INC.	6581
CENTURYLINK COMMUNICATIONS, LLC	508J
CENTURYTEL TEL AL LLC (NORTHERN) DBA CENTURYLINK	9789
CHARTER FIBERLINK - ALABAMA, LLC - AL	349D
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CSC WIRELESS, LLC	425J
DELTACOM, INC. - AL	4615
DISH WIRELESS, LLC	490J
FRACTEL, LLC	965H
FRONTIER COMMUNICATIONS OF THE SOUTH, LLC - AL	0301
HARGRAY OF ALABAMA, INC. - AL	432J
HD CARRIER LLC	321J
HOPPER TELECOMMUNICATIONS LLC	0300
INTRADO COMMUNICATIONS LLC	807C
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - AL	5255
LEVEL 3 TELECOM OF ALABAMA, LLC - AL	7327
MCC TELEPHONY OF THE SOUTH, LLC - AL	773F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229

MCIMETRO ACCESS TRANSMISSION SERVICES LLC - AL	7469
METROPCS, INC.	5562
MOUNDVILLE TEL. CO.	0307
NETWORK TELEPHONE CORPORATION - AL	9236
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
OAKMAN TEL. CO., INC.	0311
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - AL	604E
OTELCO TELEPHONE, LLC	0312
PINE BELT BROADCASTING DBA PINE BELT TEL COMP SVCS	9736
PINE BELT CELLULAR, INC.	4260
POWERTEL BIRMINGHAM LICENSES, INC.	7475
RADIANTIQ LLC	566J
RAGLAND TEL. CO., INC.	0316
RCLEC, INC.	156J
SATELLINK PAGING, INC.	6792
SOUTHERN COMMUNICATIONS SERVICES, INC.	6744
SPRINT SPECTRUM, L.P.	6664
STRATUS NETWORKS	495J
TELEPORT COMMUNICATIONS AMERICA, LLC - AL	8271
TELNYX LLC	073H
THE VOICE APPLICATION NETWORK, LLC	507J
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J
US LEC OF ALABAMA, INC.	4839
USA MOBILITY WIRELESS, INC.	6630
VOIP INNOVATIONS, LLC	597F
VONAGE AMERICA LLC	197D
WHITESKY COMMUNICATIONS, LLC	553J
WIDE VOICE, LLC - AL	764H
WINDSTREAM ALABAMA, INC.	0302
WINDSTREAM NUVOX, INC.	8660
YMAX COMMUNICATIONS CORP. - AL	348E

Alabama 205/659 Block holders with No CO Codes Assigned

Company	OCN
TERRA NOVA TELECOM INC.	145J
CORETEL ALABAMA, INC. - AL	476F
FARMERS TELECOMMUNICATIONS CORPORATION - AL	947D

ALABAMA 251 CO CODE HOLDERS	
Company	**OCN**
AIRUS, INC. - AL	476H
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - AL	072F
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417
BRIGHT HOUSE NTWS INFORMATION SVCS (ALABAMA) - AL	336E
BUTLER TEL. CO., INC.	0284
CALLIS COMMUNICATIONS, INC. - AL	736D
CASTLEBERRY TEL. CO., INC.	0285
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AL	6804
CELLULAR SOUTH, INC.	6581
CENTURYLINK COMMUNICATIONS, LLC	508J
CENTURYTEL TEL AL LLC (NORTHERN) DBA CENTURYLINK	9789
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CSC WIRELESS, LLC	425J
DELTACOM, INC. - AL	4615
DISH WIRELESS, LLC	490J
ELISKA WIRELESS VENTURES SUBSIDIARY I, LLC	6916
FRACTEL, LLC	965H
FRONTIER COMMUNICATIONS OF THE SOUTH, LLC - AL	0306
FRONTIER COMMUNICATIONS OF THE SOUTH, LLC - AL	4464
GULF TELEPHONE COMPANY DBA CENTURYLINK	0298

HARBOR COMMUNICATIONS, LLC - AL	9826
INTRADO COMMUNICATIONS LLC	807C
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - AL	5255
LEVEL 3 TELECOM OF ALABAMA, LLC - AL	7327
MCC TELEPHONY OF THE SOUTH, LLC - AL	773F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - AL	7221
METROPCS, INC.	5562
MILLRY TEL. CO.	0304
NETWORK TELEPHONE CORPORATION - AL	9236
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NEWSOUTH COMMUNICATIONS, INC. DBA UNIVERSALCOM FL	7598
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - AL	604E
PINE BELT BROADCASTING DBA PINE BELT TEL COMP SVCS	9736
RADIANTIQ LLC	566J
RCLEC, INC.	156J
SOUTHERN COMMUNICATIONS SERVICES, INC.	6744
SPRINT SPECTRUM, L.P.	6664
TELEPAK NETWORKS, INC. - AL	947G
TELEPORT COMMUNICATIONS AMERICA, LLC - AL	8271
TELNYX LLC	073H
TWILIO INTERNATIONAL, INC.	506J
US LEC OF ALABAMA, INC.	4839
USA MOBILITY WIRELESS, INC.	6630
VONAGE AMERICA LLC	197D
YMAX COMMUNICATIONS CORP. - AL	348E

Alabama 251 Block holders with No CO Codes Assigned

Company	OCN
TERRA NOVA TELECOM INC.	145J
TON80 COMMUNICATIONS, LLC	516J
ONVOY, LLC - MS	719E
WINDSTREAM NUVOX, INC.	8660

ALABAMA 256/938 CO CODE HOLDERS	
Company	**OCN**
AIRUS, INC. - AL	476H
ARDMORE TEL. CO., INC.	0280
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - AL	072F
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417
BRINDLEE MOUNTAIN TELEPHONE LLC	0283
CALLWORKS CORPORATION	475J
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AL	6804
CENTURYLINK COMMUNICATIONS LLC - AL	327A
CENTURYLINK COMMUNICATIONS LLC - AL	7451
CENTURYLINK COMMUNICATIONS, LLC	508J
CENTURYTEL TEL AL LLC (NORTHERN) DBA CENTURYLINK	9789
CENTURYTEL TEL AL LLC (SOUTHERN) DBA CENTURYLINK	9788
CHARTER FIBERLINK - ALABAMA, LLC - AL	349D
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CORETEL ALABAMA, INC. - AL	476F
CSC WIRELESS, LLC	425J
DELTACOM, INC. - AL	4615
DISH WIRELESS, LLC	490J
DOVETEL COMMUNICATIONS LLC - AL	799G
FARMERS TELECOMMUNICATIONS COOPERATIVE, INC.	0290
FARMERS TELECOMMUNICATIONS CORPORATION - AL	947D
FRACTEL, LLC	965H
HD CARRIER LLC	321J
IDT AMERICA CORP. - AL	058J
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - AL	5255
MCC TELEPHONY OF THE SOUTH, LLC - AL	773F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - AL	7469

METROPCS, INC.	5562
NATIONAL TELEPHONE OF ALABAMA, INC.	0286
NETWORK TELEPHONE CORPORATION - AL	9236
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NEW HOPE TEL. COOP.	0308
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - AL	604E
PEOPLES TEL. CO., INC.	0314
POWERTEL BIRMINGHAM LICENSES, INC.	7475
RADIANTIQ LLC	566J
SHELCOMM	0051
SOUTHERN COMMUNICATIONS SERVICES, INC.	6744
SPRINT SPECTRUM, L.P.	6664
STRATUS NETWORKS	495J
TELEPORT COMMUNICATIONS AMERICA, LLC - AL	8271
TELNYX LLC	073H
TERRA NOVA TELECOM INC.	145J
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J
US LEC OF ALABAMA, INC.	4839
USA MOBILITY WIRELESS, INC.	6630
VOIP INNOVATIONS, LLC	597F
VONAGE AMERICA LLC	197D
WHITESKY COMMUNICATIONS, LLC	553J
WINDSTREAM ALABAMA, INC.	0302
WINDSTREAM NUVOX, INC.	8660
WOW! INTERNET, CABLE AND PHONE	961J
YMAX COMMUNICATIONS CORP. - AL	348E

Alabama 256/938 Block holders with No CO Codes Assigned

Company	OCN
HARGRAY OF ALABAMA, INC. - AL	432J

Central Office Code Summary

NPA	334	205	659	251	256	938
Assigned NXXs	730	785	137	483	784	82
Reserved NXXs	0	0	0	0	0	0
Unavailable NXXs	22	15	14	15	16	14
Available NXXs	48	0	649	302	0	704
Total	800	800	800	800	800	800

Codes Assignment History	2018	2019	2020	2021	2022	2023
334 NPA	6	7	28	27	10	17*
205 NPA	26	25	13	0	2	4*
659 NPA	N/A	17	39	52	15	15*
251 NPA	10	10	21	42	27	13*
256 NPA	8	12	18	35	13	10*
938 NPA	1	10	15	10	21	15*

*As of September 28, 2023

Exhaust:	Based on the April 2023 NRUF and NPA Exhaust Analysis, the 334 NPA is projected to exhaust in 3Q2026. Based on the April 2023 NRUF and NPA Exhaust Analysis, the 205/659 NPA is projected to exhaust in 2Q2043, the 251 NPA is projected to exhaust in 4Q2033 and the 256/938 NPA is projected to exhaust in 2Q2044.

Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).

THOUSANDS-BLOCK STATISTICS				
ST/NPA:	**AL 334**	**AL 205/659**	**AL 251**	**AL 256/938**
MEETING DATE:	**10/30/2023**	**10/30/2023**	**10/30/2023**	**10/30/2023**
RATE CENTERS				
# Total	**96**	**70**	**42**	**91**
# Mandatory	**1**	**37**	**15**	**91**
# Mandatory-Single Service Providers (M*)	**0**	**0**	**0**	**0**
# Optional	**82**	**33**	**21**	**0**
# Excluded	**13**	**0**	**6**	**0**
BLOCKS ASSIGNED				
# Total	**305**	**372**	**224**	**506**
(For time period 11/1/22 - 9/29/23)				
BLOCKS AVAILABLE				
#Total	**450**	**371**	**186**	**450**
(As of preparation date: 9/29/23)				
CODES ASSIGNED				
# Total	**18**	**20**	**13**	**30**
# for Pool Replenishment	**14**	**17**	**10**	**26**
# for Dedicated Customers	**0**	**1**	**0**	**1**
# for LRNs	**4**	**2**	**3**	**3**
(For time period 11/01/22 - 9/29/23)				
CODES FORECASTED				
# Total	**21**	**21**	**14**	**39**
# for Pool Replenishment and Dedicated Customers	**21**	**21**	**14**	**39**
# for LRNs	**0**	**0**	**0**	**0**
(For the next twelve months as of: 9/29/23)				

Initial Planning Document

for

Relief of Alabama 334 NPA

October 30, 2023

North American Numbering Plan Administrator

Cecilia McCabe
NPA Relief Planner

334 NPA Background Information

Relief Planning Background and Assumptions:
The 205 NPA was the original NPA assigned in 1947 to serve the entire state of Alabama. A geographic split of the 205 NPA in 1995 created the 334 NPA. The 205 NPA was split again in 1998 creating the 256 NPA. In 2000, the Alabama Public Service Commission ("Commission") approved a geographic split of the 334 NPA, creating the 251 NPA. In April 2001, the Commission approved an all-services distributed overlay of the 205 NPA. Implementation of the 659 NPA was delayed until 2019 due to number conservation measures. In 2009, the Commission approved an all-services distributed overlay in Alabama of the 256 NPA and the 938 NPA was introduced. Due to the suspension of the implementation of the 659 NPA over the 205, this was the first overlay implemented in Alabama.

Cities in the 334 NPA include but are not limited to Montgomery, Dothan, Auburn, Prattville, Phenix City, Enterprise, Opelika, Selma and many other smaller communities. The 334 NPA is bordered on the north by the Alabama 205/659 and 256/938 NPAs, to the east by the Georgia 706/762 and 229 NPAs, to the south by the Alabama 251 NPA and Florida 850/448 NPAs and to the west by the Alabama 205/659 and 251 NPAs.

Exhaust Forecast:
The April 2023 Numbering Resource Utilization/Forecast ("NRUF") and NPA Exhaust Analysis ("April 2023 NRUF Report"), published by NANPA, indicates that the 334 NPA will exhaust during the third quarter of 2026. Relief planning in the 334 NPA is to start in the third quarter of 2023.

The April 2023 NRUF Report also indicates that the 205/659 NPA will exhaust during the second quarter of 2043, the 251 NPA will exhaust during the fourth quarter 2033 and the 256/938 NPAs will exhaust during the second quarter of 2044. These NPAs are included in possible alternatives for relief contained in this Initial Planning Document ("IPD").

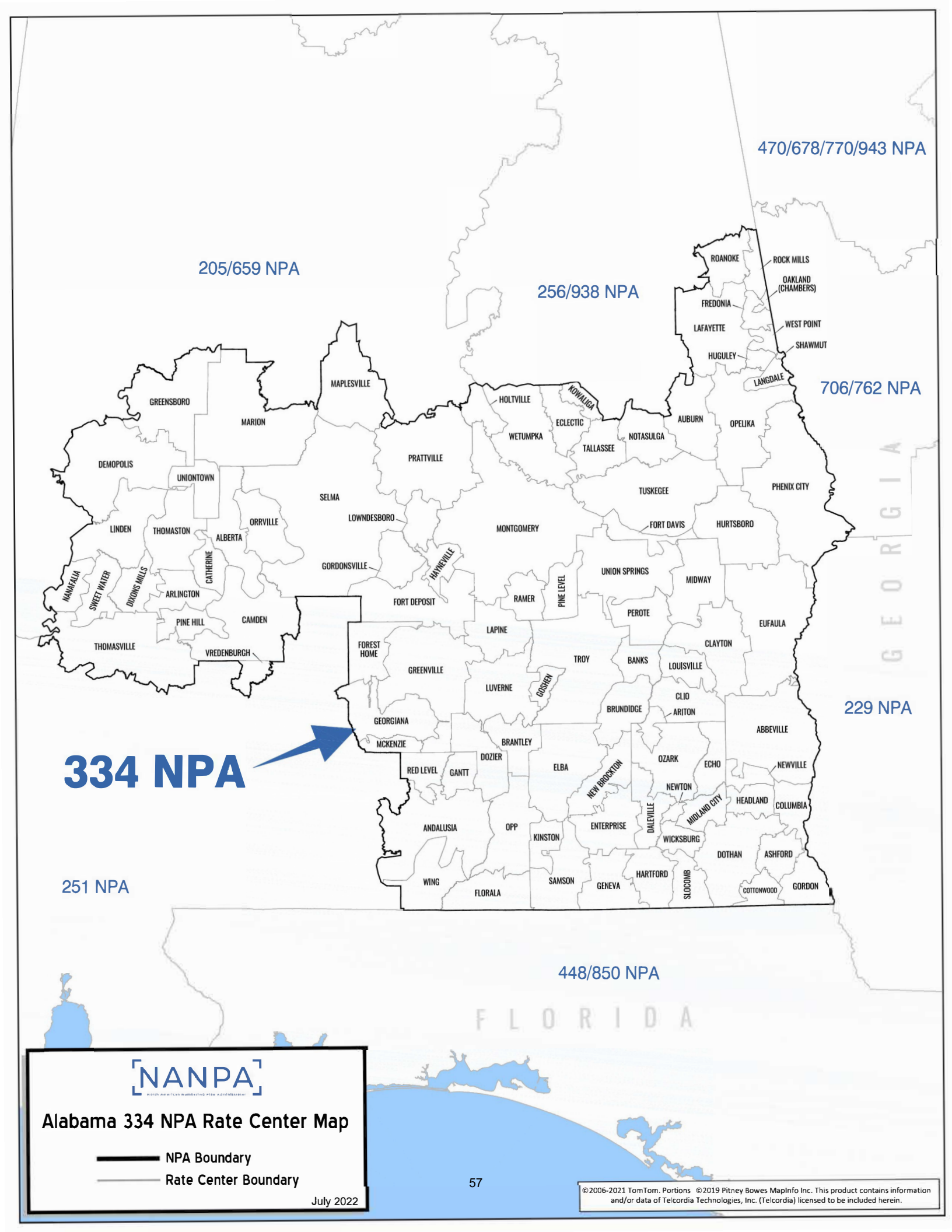
CURRENT DIALING PLAN OF THE 334 NPA

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)

CURRENT DIALING PLAN OF THE 205/659, 251 AND 256/938 NPAs

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) 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 service provider discretion.



NANPA

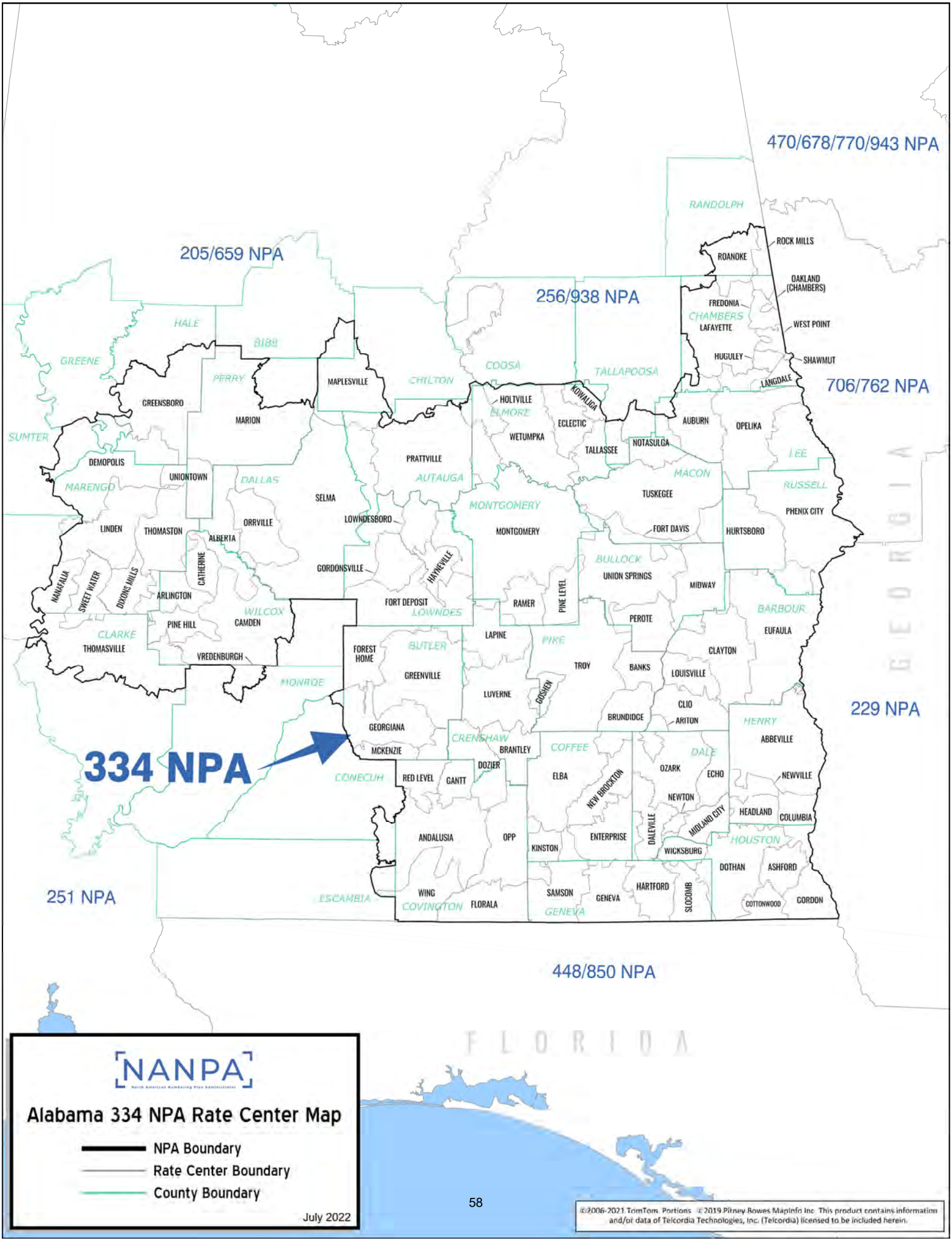
North American Numbering Plan Administrator

Alabama 334 NPA Rate Center Map

NPA Boundary

Rate Center Boundary

July 2022



AL - Alabama


• Florence
• Huntsville
938
256
• Gadsden
205
659
• Anniston
• Birmingham
• Tuscaloosa
AL
• Auburn
• Selma
< Montgomery
334
• Jackson
• Dothan
251
Single Area Code
Overlay Area Codes

ALABAMA 334 NUMBERING PLAN AREA (NPA) RELIEF ALTERNATIVES

NPA Established: 1995

ALTERNATIVE DESCRIPTIONS

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 334 NPA. Central Office ("CO") codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 334 NPA have been allocated. Customers would retain their current telephone numbers, and ten-digit local dialing would be required within and between the 334 NPA and the new overlay NPA. There are 96 rate centers in the 334 NPA and at the current assignment rate, the projected life of this alternative would be 44 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 334 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs. The proposed boundary would split the 334 NPA resulting in the western section of the 334 NPA designated as Area A, and the eastern section designated as Area B, as shown in the Alternative #2 - 334 NPA Split Option Map. At the current assignment rate, the projected life of this alternative would be:

Area A	**Area B**
Total Rate Centers = 47	Total Rate Centers = 49
Area code life in years = 45	Area code life in years = 46

ALTERNATIVE #3 – GEOGRAPHIC SPLIT

The 334 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs. The proposed boundary would split the 334 NPA with the northern section of the 334 NPA designated as Area A, and the southern section designated as Area B, as shown in the Alternative #3 - 334 NPA Split Option Map. At the current assignment rate, the projected life of this alternative would be:

Area A	**Area B**
Total Rate Centers = 40	Total Rate Centers = 56
Area code life in years = 48	Area code life in years = 43

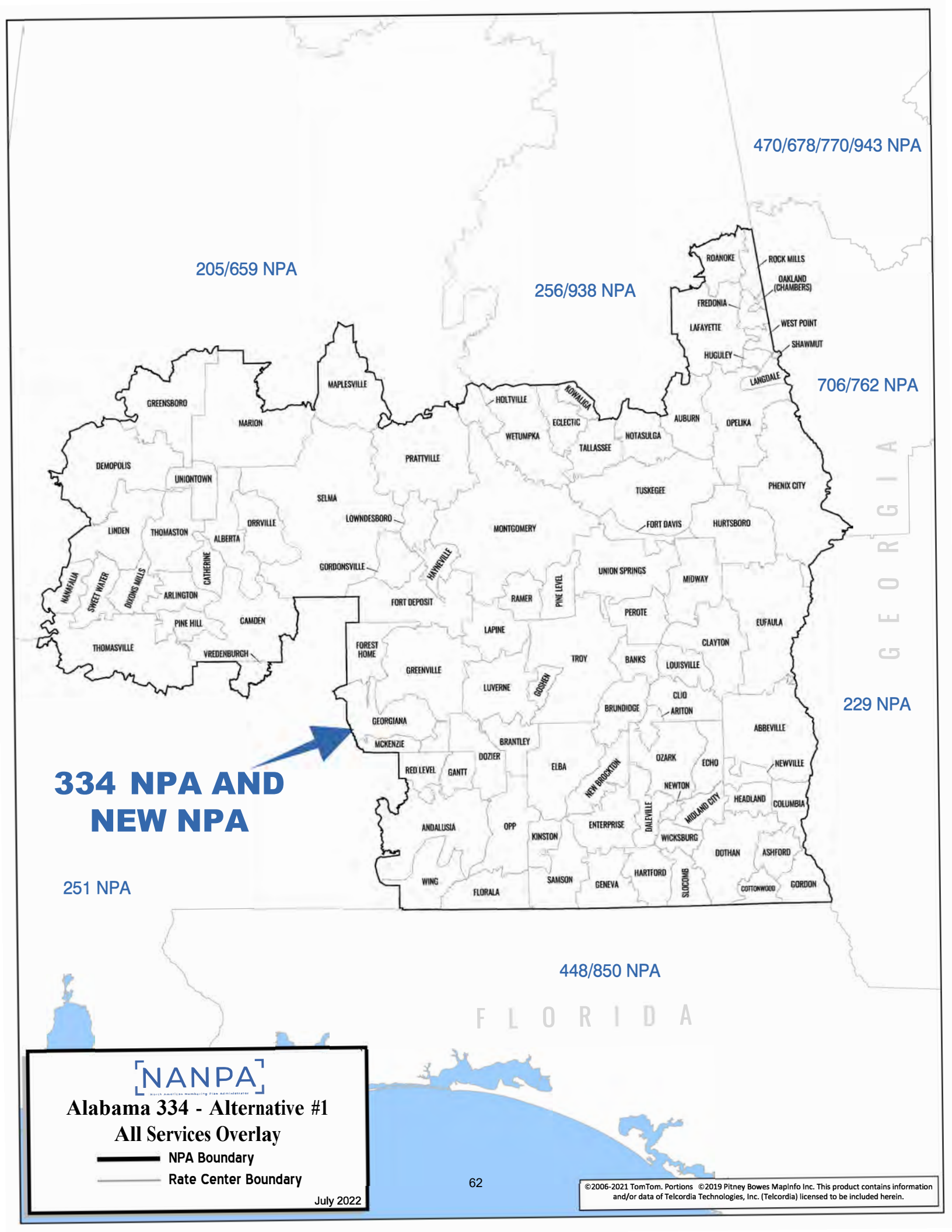
ALTERNATIVE #4 – NPA BOUNDARY ELIMINATION OVERLAY

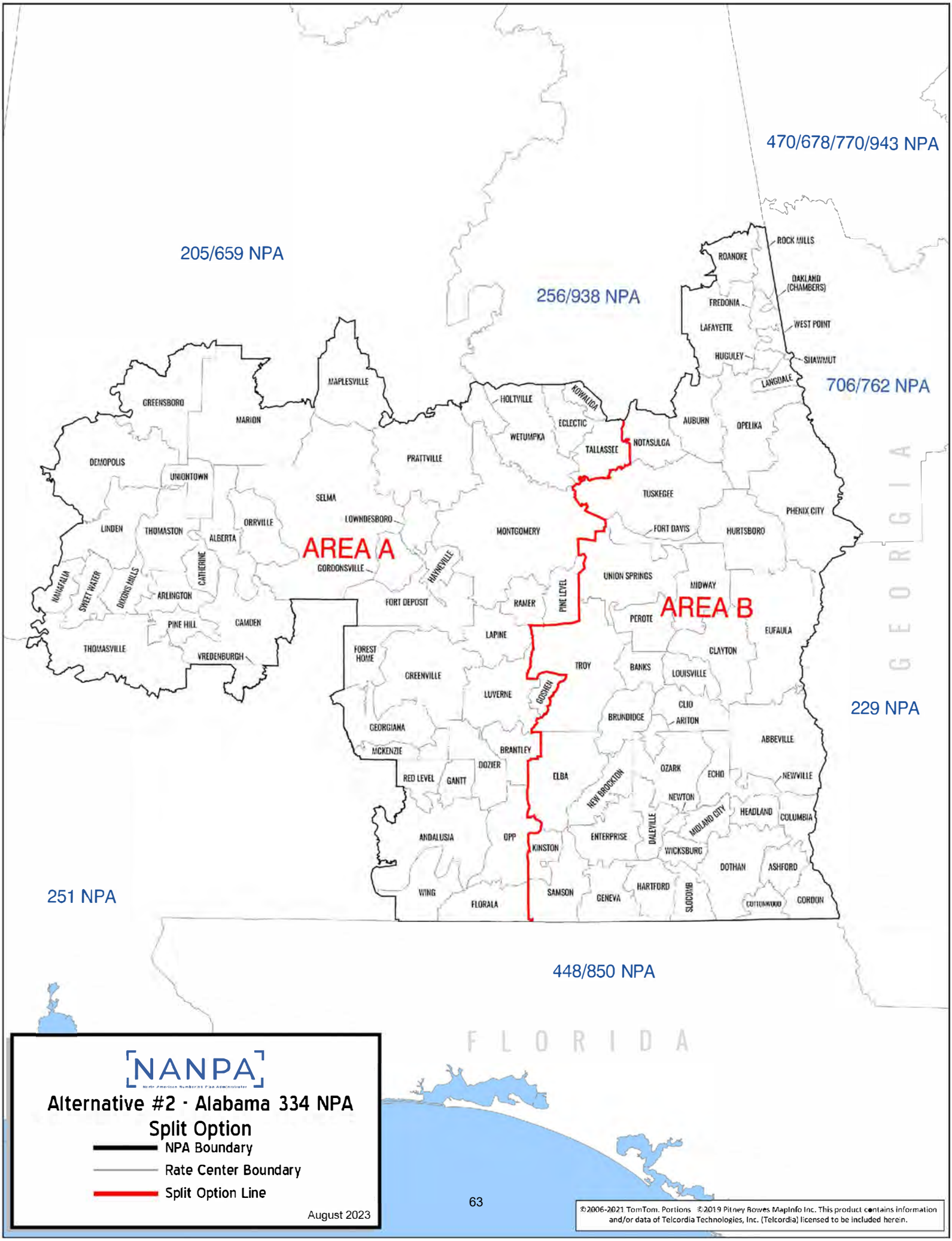
The boundary between the existing 334, 205/659, 251, and 256/938 NPAs would be eliminated and the 334, 205/659, 251, 256/938 NPAs would occupy the entire state of

Alabama. The 334, 205/659, 251, 256/938 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within and between the 334, 205/659, 251, 256/938 NPAs affected area would be required. The 334 NPA currently has 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing is required for the 251 NPA as it transitioned to ten-digit local dialing by July 2022 as a result of the implementation of the 988 abbreviated dialing code for the national 988 Suicide and Crisis Lifeline.

Available CO codes in the 205/659, 251, 256/938 NPAs will be assigned upon request in the 334 area with the effective date of the new NPA boundary elimination and available 334 NPA CO codes could be assigned upon request in the 205/659, 251, 256/938 NPA area. At exhaust of the 334 NPA, all future CO code assignments will be made from the 205/659, 251, 256/938 NPAs code supply of CO codes.

The 205/659 NPA has 70 rate centers, and the current projected exhaust is 2Q2043. The 251 NPA has 42 rate centers, and the current projected exhaust is 4Q2033. The 256/938 NPA has 91 rate centers, and the current projected exhaust is 2Q2044. Eliminating the boundary between the 334, 205/659, 251, and 256/938 NPAs would combine the 96 rate centers in the 334 NPA with the other rate centers in the state, resulting in an overlay area with 299 rate centers. At the current assignment rate, this alternative has a life of 18 years and would save three NPAs based on current exhaust projections and the combined life of the NPAs.

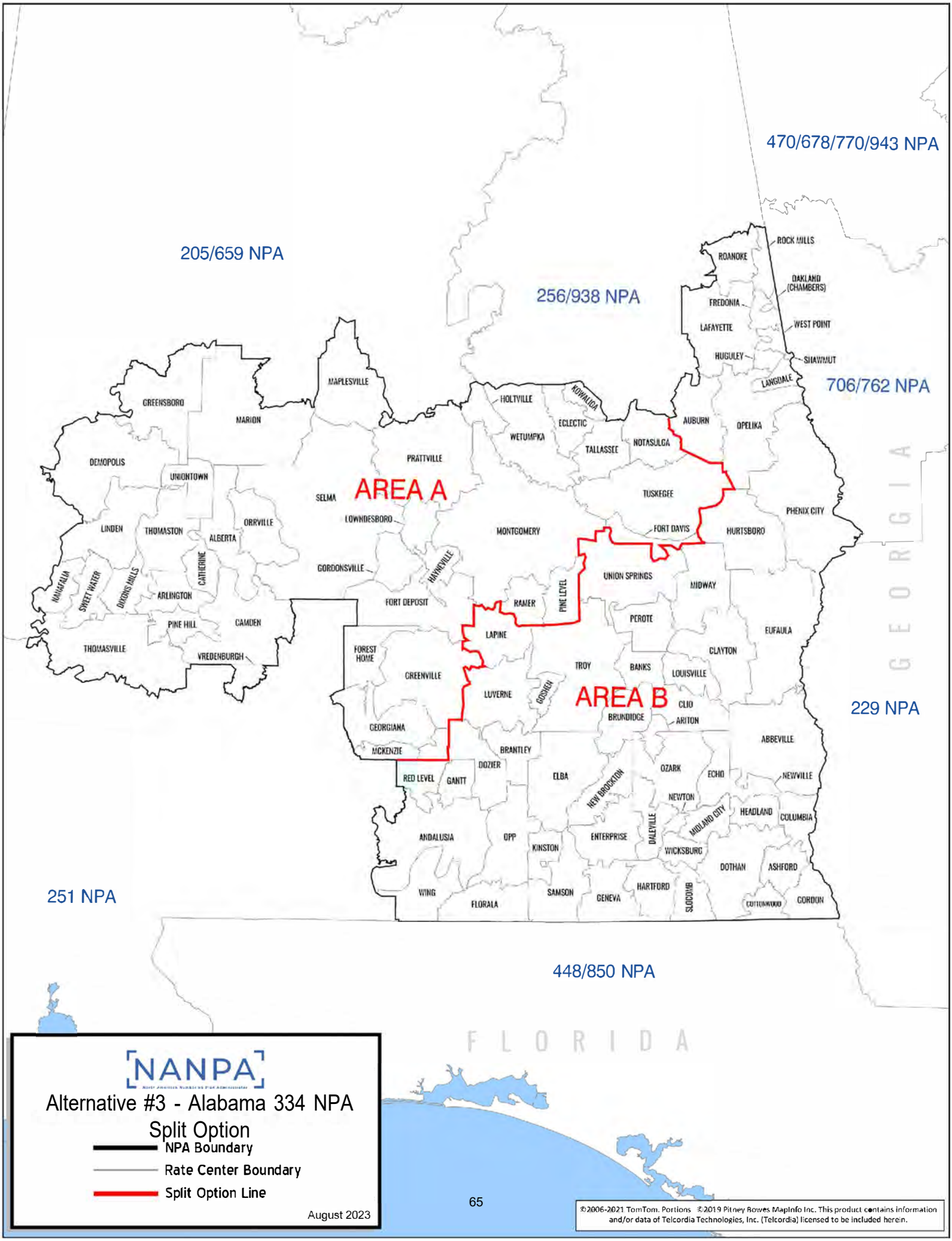




Alabama 334 NPA Split – Alternative #2

Area A Rate Centers
ALBERTA
ANDALUSIA
ARLINGTON
BRANTLEY
CAMDEN
CATHERINE
DEMOPOLIS
DIXONS ML
DOZIER
ECLECTIC
FLORALA
FORESTHOME
FT DEPOSIT
GANTT
GEORGIANA
GORDONSVL
GOSHEN
GREENSBORO
GREENVILLE
HAYNEVILLE
HOLTVILLE
KOWALIGA
LAPINE
LINDEN
LOWNDESBO
LUVERNE
MAPLESVL
MARION
MCKENZIE
MONTGOMERY
NANAFALIA
OPP
ORRVILLE
PINE HILL
PINE LEVEL
PRATTVILLE
RAMER
RED LEVEL
SELMA
SWEETWATER
TALLASSEE
THOMASTON
THOMASVL
UNIONTOWN
VREDENBG
WETUMPKA
WING

Area B Rate Centers
ABBEVILLE
ARITON
ASHFORD
AUBURN
BANKS
BRUNDIDGE
CLAYTON
CLIO
COLUMBIA
COTTONWOOD
DALEVILLE
DOTHAN
ECHO
ELBA
ENTERPRISE
EUFAULA
FORT DAVIS
FREDONIA
GENEVA
GORDON
HARTFORD
HEADLAND
HUGULEY
HURTSBORO
KINSTON
LAFAYETTE
LANGDALE
LOUISVILLE
MIDLAND CY
MIDWAY
NEWBROCKTN
NEWTON
NEWVILLE
NOTASULGA
OAKLAND
OPELIKA
OZARK
PEROTE
PHENIXCITY
ROANOKE
ROCK MILLS
SAMSON
SHAWMUT
SLOCOMB
TROY
TUSKEGEE
UNION SPG
WEST POINT
WICKSBURG



Alabama 334 NPA Split – Alternative #3

Area A Rate Centers
ALBERTA
ARLINGTON
CAMDEN
CATHERINE
DEMOPOLIS
DIXONS ML
ECLECTIC
FORESTHOME
FORT DAVIS
FT DEPOSIT
GEORGIANA
GORDONSVL
GREENSBORO
GREENVILLE
HAYNEVILLE
HOLTVILLE
KOWALIGA
LINDEN
LOWNDESBO
MAPLESVL
MARION
MCKENZIE
MONTGOMERY
NANAFALIA
NOTASULGA
ORRVILLE
PINE HILL
PINE LEVEL
PRATTVILLE
RAMER
SELMA
SWEETWATER
TALLASSEE
THOMASTON
THOMASVL
TUSKEGEE
UNIONTOWN
VREDENBG
WETUMPKA
WICKSBURG

Area B Rate Centers
ABBEVILLE
ANDALUSIA
ARITON
ASHFORD
AUBURN
BANKS
BRANTLEY
BRUNDIDGE
CLAYTON
CLIO
COLUMBIA
COTTONWOOD
DALEVILLE
DOTHAN
DOZIER
ECHO
ELBA
ENTERPRISE
EUFAULA
FLORALA
FREDONIA
GANTT
GENEVA
GORDON
GOSHEN
HARTFORD
HEADLAND
HUGULEY
HURTSBORO
KINSTON
LAFAYETTE
LANGDALE
LAPINE
LOUISVILLE
LUVERNE
MIDLAND CY
MIDWAY
NEWBROCKTN
NEWTON
NEWVILLE

OAKLAND
OPELIKA
OPP
OZARK
PEROTE
PHENIXCITY
RED LEVEL
ROANOKE
ROCK MILLS
SAMSON
SHAWMUT
SLOCOMB
TROY
UNION SPG
WEST POINT
WING

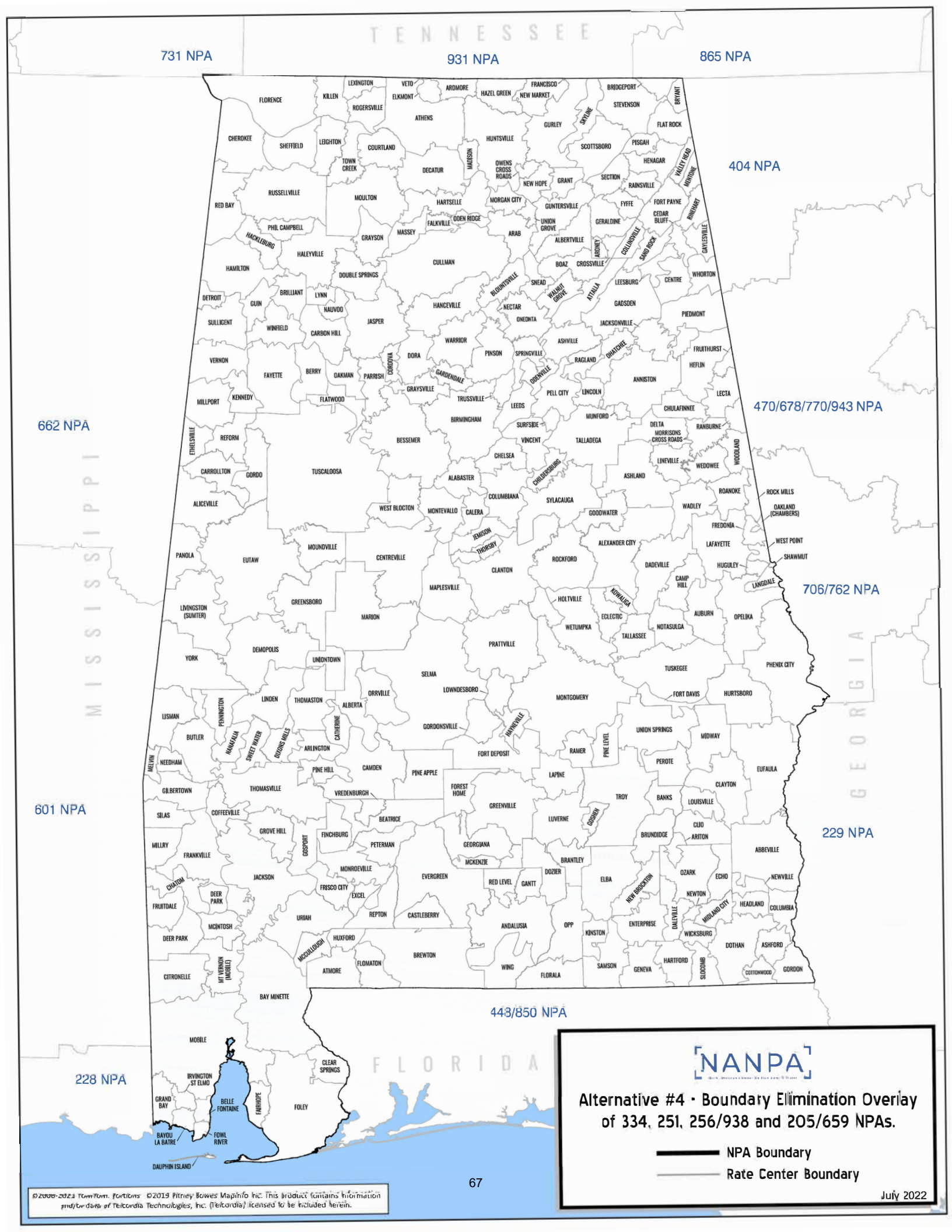


EXHIBIT B

November 21, 2023

To: All 334 NPA Code Holders and Interested Industry Members (Alabama)

Subject: Final Minutes of the Initial Planning Meeting for the 334 NPA

Attached are the final minutes from the October 30, 2023, Alabama 334 NPA Initial Planning meeting. These minutes became final on November 20, 2023.

If you have any questions, I can be reached by phone at (925) 420-0130 or contact me by email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Dee Newman – Alabama Public Service Commission
Jeff Johnson – Alabama Public Service Commission
David Peeler – Alabama Public Service Commission

ALABAMA 334 NPA
INITIAL RELIEF PLANNING MEETING
VIA WEB CONFERENCE
FINAL MINUTES
October 30, 2023

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
Cecilia stated that the Alliance for Telecommunications Industry Solutions ("ATIS") 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 as follows:

- Starts the relief planning process 36 months prior to exhaust of the NPA.
- Distributes the Initial Planning Document ("IPD") at least four weeks prior to the first industry meeting, which was completed on September 29, 2023.
- Facilitates the meeting, permitting the telecommunications industry of Alabama ("Industry") to reach consensus on the relief alternative to be included in the regulatory filing.
- Determines any additional items to include in the regulatory filing with the Alabama Public Service Commission ("Commission") such as the implementation intervals, dialing plan, and compliance with any state-specific requirements.
- Then, NANPA is charged with the responsibility of making a regulatory filing on behalf of the Industry with the Commission. Once the Industry comes to consensus on what should be included in the filing, NANPA will complete the regulatory filing within six weeks of today's meeting per the INC guidelines or as decided by the Industry or as required by the state statute.

HISTORY OF 334 NPA
Cecilia stated that in 2000, the 334 NPA was in need of NPA relief and Jeopardy was also declared during that time due to increase in demand for Central Office ("CO") codes. On October 2, 2000, the Commission approved an NPA split for the 334 NPA. The 251 NPA was introduced on June 18, 2001, to serve the southwestern portion of the previous 334 NPA geographic area.

REVIEW NPA RELIEF PLANNING GUIDELINES
Cecilia reviewed pertinent sections of the NPA Code Relief Planning and Notifications Guidelines ATIS-0300061 ("Guidelines").

Cecilia reviewed Section 5.0, which states:

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

For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.

Cecilia reviewed section 6.1 of the Guidelines regarding an NPA Split which states:

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.

Cecilia noted that there is more than one viable relief option available for the 334 NPA and reviewed section 6.3 of the Guidelines regarding an all-services distributed overlay which states:

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

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

Cecilia also reviewed Section 6.3.2 of the Guidelines regarding a boundary elimination overlay which states:

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 available 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 a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs, and may require a longer implementation interval.

Cecilia also reviewed Section 7.2 of the Guidelines which states:

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be in place six months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three months before the existing NPA would exhaust under the highest growth projections.

Cecilia then referred the Industry participants to Annex B of the Guidelines which lists issues to be considered during NPA relief planning, and Annex E which lists general attributes of the most common relief alternatives.

Cecilia stated that the Guidelines, including the referenced sections, can be downloaded from the ATIS web site at: (www.atis.org).

Cecilia reviewed the following pertinent documents that were also included in the meeting materials and stated that because one of the relief alternatives includes all NPAs in Alabama, all NPAs were included in the rate center lists as well as the code holder lists:

- Relief planning meeting aids
- Rate center lists for all Alabama NPAs
- Code holder lists for all Alabama NPAs

CO CODE STATUS

334 NPA: As of October 27, 2023, the 334 NPA has 733 CO codes assigned, 45 CO codes available for assignment, and 22 unavailable CO codes. There are 66 service providers in the 334 NPA with assigned CO codes and one (1) OCN that has only thousands-blocks.

205 NPA: As of October 27, 2023, the 205 NPA has 785 CO codes assigned, no CO codes available for assignment, and 15 unavailable CO codes.

659 NPA: As of October 27, 2023, the 659 NPA has 137 CO codes assigned, 649 CO codes available for assignment, and 14 unavailable CO codes. There are 70 service providers in the 205/659 NPA with assigned CO codes and three (3) OCNs that only have thousands-blocks.

256 NPA: As of October 27, 2023, the 256 NPA has 784 CO codes assigned, no CO codes available for assignment, and 16 unavailable CO codes.

938 NPA: As of October 27, 2023, the 938 NPA has 86 CO codes assigned, 700 CO codes available for assignment, and 14 unavailable CO codes. There are 64 service providers in the 256/938 NPA with assigned CO codes and one (1) OCN that has only thousands-blocks.

251 NPA: As of October 27, 2023, the 251 NPA has 484 CO codes assigned, 301 CO codes available for assignment, and 15 unavailable CO codes. There are 55 service providers in the 251 NPA with assigned CO codes and four (4) OCNs that have only thousands-blocks. (See Attachment #2)

THOUSANDS-BLOCK INFORMATION
Cecilia reported that in the 334 NPA, there are 96 rate centers of which one (1) is mandatory, 82 are optional and 13 rate centers are excluded for pooling. From November 1, 2022, through October 27, 2023, there have been 352 blocks assigned and 22 CO codes assigned: 18 for pool replenishment and four (4) for LRNs. As of October 27, 2023, there are 444 blocks available. The forecasted need for CO codes for the next twelve months is 20 CO codes for pool replenishment and dedicated customers.

In the 205/659 NPA, there are 70 rate centers of which 37 are mandatory and 33 are optional for pooling. From November 1, 2022, through October 27, 2023, there have been 388 blocks assigned and 21 CO codes assigned: 18 for pool replenishment, one (1) for a dedicated customer and two (2) for LRNs. As of October 27, 2023, there are 375 blocks available. The forecasted need for CO codes for the next twelve months is 22 CO codes for pool replenishment and dedicated customers.

In the 256/938 NPA, there are 91 rate centers which are all mandatory for pooling. From November 1, 2022, through October 27, 2023, there have been 553 blocks assigned and 31 CO codes assigned: 28 for pool replenishment and three (3) for LRNs. As of October 27, 2023, there are 427 blocks available. The forecasted need for CO codes for the next twelve months is 38 CO codes for pool replenishment and dedicated customers.

In the 251 NPA, there are 42 rate centers of which 15 are mandatory, 21 are optional and six (6) are excluded for pooling. From November 1, 2022, through October 27, 2023, there have been 252 blocks assigned and 14 CO codes assigned: 11 for pool replenishment and three (3) for LRNs. As of October 27, 2023, there are 169 blocks available. The forecasted need for CO codes for the next twelve months is eight (8) CO codes for pool replenishment and dedicated customers.
(See Attachment #3)

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS
The 205 NPA was the original NPA assigned in 1947 to serve the entire state of Alabama. A geographic split of the 205 NPA in 1995 created the 334 NPA. The 205 NPA was split again in 1998 creating the 256 NPA. As previously stated, in 2000, the Commission approved a geographic split of the 334 NPA, creating the 251 NPA. In April 2001, the Commission approved an all-services distributed overlay of the 205 NPA, the implementation of the 659 NPA was delayed until 2019 due to number conservation measures. In 2009, the Commission approved an all-services distributed overlay of the 256 NPA and the 938 NPA was implemented, which was the first overlay implemented in Alabama.

Cities in the 334 NPA include but are not limited to Montgomery, Dothan, Auburn, Prattville, Phenix City, Enterprise, Opelika, Selma and many other smaller communities. The 334 NPA is bordered on the north by the Alabama 205/659 and 256/938 NPAs, to the east by the Georgia 706/762 and 229 NPAs, to the south by the Alabama 251 NPA and Florida 448/850 NPAs and to the west by the Alabama 205/659 and 251 NPAs.

Exhaust Forecast:
The April 2023 Numbering Resource Utilization/Forecast ("NRUF") and NPA Exhaust Analysis ("April 2023 NRUF Report"), published by NANPA, indicates that the 334 NPA will exhaust

during the third quarter of 2026. Relief planning in the 334 NPA is to start in the third quarter of 2023.

The April 2023 NRUF Report also indicates that the 205/659 NPA will exhaust during the second quarter of 2043, the 251 NPA will exhaust during the fourth quarter of 2033 and the 256/938 NPAs will exhaust during the second quarter of 2044. These NPAs are included in possible alternatives for relief contained in this IPD.

Cecilia stated that the October 2023 Numbering Resource Utilization/Forecast ("NRUF") and NPA Exhaust Analysis ("October 2023 NRUF Report") was posted to the NANPA website on October 17, after the Alabama 334 Initial Implementation meeting notice was sent out. The projected exhaust date for the 334 NPA did not change.

However, the projected exhaust dates changed for several of the other affected Alabama NPAs: the 205/659 NPA will exhaust in the fourth quarter of 2044, the 251 NPA will exhaust in the fourth quarter of 2035 and the 256/938 NPA will exhaust in the third quarter of 2043.

Cecilia also reviewed the current dialing plan in the 334, 205/659, 251 and 256/938 NPAs and a current NPA map of Alabama.

REVIEW OF RELIEF PLANNING OPTIONS
Cecilia presented four relief alternatives for the 334 NPA:

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY
A new NPA would be assigned to the same geographic area occupied by the existing 334 NPA. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 334 NPA have been allocated. The 334 NPA currently has 7-digit local dialing and would need to transition to 10-digit local dialing. Customers would retain their current telephone numbers, and ten-digit local dialing would be required within and between the 334 and the new overlay NPA. There are 96 rate centers in the 334 NPA and at the current assignment rate, the projected life of this alternative would be 44 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT
The 334 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs. The proposed boundary would split the 334 NPA resulting in the western section of the 334 NPA designated as Area A, and the eastern section designated as Area B, as shown in the Alternative #2 - 334 NPA Split Option Map. At the current assignment rate, the projected life of this alternative would be:

Area A	**Area B**
Total Rate Centers = 47	Total Rate Centers = 49
Area code life in years = 45	Area code life in years = 46

ALTERNATIVE #3 – GEOGRAPHIC SPLIT

The 334 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 334 NPA and which side would receive the new NPA. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs. The proposed boundary would split the 334 NPA with the northeastern section of the 334 NPA designated as Area A, and the western section designated as Area B, as shown in the Alternative #3 - 334 NPA Split Option Map. At the current assignment rate, the projected life of this alternative would be:

Area A	**Area B**
Total Rate Centers = 40	Total Rate Centers = 56
Area code life in years = 48	Area code life in years = 43

ALTERNATIVE #4 – NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 334, 205/659, 251, and 256/938 NPAs would be eliminated and the 334, 205/659, 251, 256/938 NPAs would occupy the entire state of Alabama. The 334, 205/659, 251, 256/938 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within and between the 334, 205/659, 251, 256/938 NPAs affected area would be required. The 334 NPA currently has 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing is required for the 251 NPA as it transitioned to ten-digit local dialing by July 2022 as a result of the implementation of the 988 abbreviated dialing code for the national 988 Suicide and Crisis Lifeline.

Available CO codes in the 205/659, 251, 256/938 NPAs will be assigned upon request in the 334 area with the effective date of the new NPA boundary elimination and available 334 NPA CO codes could be assigned upon request in the 205/659, 251, 256/938 NPA area. At exhaust of the 334 NPA, all future CO code assignments will be made from the 205/659, 251, 256/938 NPAs supply of CO codes.

The 205/659 NPA has 70 rate centers, and the current projected exhaust is 4Q2044. The 251 NPA has 42 rate centers, and the current projected exhaust is 4Q2035. The 256/938 NPA has 91 rate centers, and the current projected exhaust is 3Q2043. Eliminating the boundary between the 334, 205/659, 251, and 256/938 NPAs would combine the 96 rate centers in the 334 NPA with the other rate centers in the state, resulting in an overlay area with 299 rate centers.

Cecilia stated that based on the October 2023 NRUF Report, with the new projected exhaust dates for the 205/659, 251 and 256/938 NPAs, the projected life for Alternative #4 - NPA Boundary Elimination Overlay, changed from what was indicated in the IPD, from 18 years to 15 years and this would save two NPAs based on the current exhaust projections.

A question was asked about the life of the NPA Boundary Elimination Overlay if a new NPA was also added to overlay the entire state. Cecilia responded that the projected life of the NPA Boundary Elimination Overlay with the addition of a new NPA would be 22 years.

CONSENSUS ON THE RELIEF ALTERNATIVE

The Industry discussed the pros and cons for each relief alternative to determine which alternative would be recommended to the Commission. A proposal was made, and consensus was reached by the service provider participants, to recommend Alternative #1, an All-Services Distributed Overlay, due to the pros and cons listed for each relief alternative. The All-Services Distributed Overlay will be included as the Industry's choice of relief in the petition filed with the Commission.

Following are the pros and cons for each relief option that were utilized by the Industry to reach consensus on the recommended alternative:

Alternative #1 - All-Services Distributed Overlay

Pros:

Alternative #1	
1	All existing customers would retain the 334 area code and would not have to change their telephone number.
2	Does not discriminate against customers on different sides of a boundary line as does a geographic split.
3	Less customer confusion and easier education process.
4	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
6	No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split.
7	Minimizes call routing issues, especially with ported numbers.
8	Easier for service providers to implement from a translations, billing and service order system perspective.
9	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table.
10	The Commission would not have to decide which side retains the 334 NPA as would be required for an NPA split.
11	Does not split cities, counties or communities of interest into different area codes.
12	Does not impact some wireless carriers that have to reprogram handsets manually as would be required for an NPA split.
13	No technical impacts to number portability, text messaging or multimedia messaging.
14	An all-services distributed overlay is simpler to implement from both a technical and customer education perspective.
15	Helps move customers toward nationwide 10-digit dialing.
16	Transitioning to 10-digit local dialing will enable central office codes protected for 7-digit routes to be released for assignment.

Cons:

Alternative #1	
1	Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 334 NPA and the new overlay NPA.
2	Financial costs to add NPA to signage and printed material where only 7-digit

	number is shown.
3	Customers would have to reprogram any equipment currently programmed to dial 7 digits to dial 10 digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.).

Alternative #2 and #3 – NPA Split

Pros:

Alternative #2 and #3	
1	Maintains seven-digit dialing for local calls within the same NPA.
2	Approximately half of the customers would not experience a change if they keep the 334 NPA.
3	The projected lives in Alternative #2 are slightly more balanced than Alternative # 3.

Cons:

Alternative #2 and #3	
1	Requires approximately half of 334 NPA customers to change their area code.
2	Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers.
3	All 334 NPA customers previously went through a split in 1995 and half will have to change their area code again.
4	Difficult Commission decision on which side retains the 334 NPA.
5	Longer time period needed for service providers to implement this type of relief.
6	Customers whose numbers change must contact friends, family and business associates with the telephone number changes.
7	More complicated and costly to implement for service providers in their billing, translations and database systems.
8	Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
9	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
10	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
11	Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
12	Split requires significant challenges to service provider's operational support systems and network elements.
13	Splits cause customer confusion with caller ID during implementation.
14	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
15	Splits require the 334 NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
16	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
17	Splits require the 800/SMS database to be updated.
18	Splits reduce the geographic area served by one area code.
19	Splits the city(s), counties or legislative districts into different area codes.

20	Splits communities of interest.
21	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the New area code during permissive dialing.
22	The last split implemented in the country was in 2007. There is additional complexity to implement a split now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.

Alternative #4 – Boundary Elimination Overlay

Pros:

Alternative # 4	
1	Delays the need to open a new NPA
2	Does not require customers to change their area code.
3	It is a more efficient use of resources.
4	Creates a consistent 10-digit dialing plan across the entire state of Alabama.
5	Minimizes call routing issues, especially with ported numbers.
6	No technical impacts to number portability, text messaging or multimedia messaging.

Cons:

Alternative # 4	
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 the 334 NPA to dial 10 digits where they would be able to dial 7 digits within the same NPA if an NPA split were implemented.
4	Complex customer education process, which would likely lead to increased customer confusion.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

Consensus was reached to include the following as the dialing plan for the 334 NPA which remains consistent with the 205/659 and 256/938 NPA overlay dialing plans:

Dialing Plan for the 334 All-Services Distributed Overlay:

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 dialing permissible at service provider's discretion

Implementation Schedule

After discussion on a suggested implementation schedule, consensus was reached on a 13-month

implementation schedule as follows:

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within existing NPA can be dialed using 7 or 10 digits)* Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Mandatory dialing period *(Effective date for CO 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 CO codes in the 334 NPA have been allocated.*

CUSTOMER EDUCATION AND TECHNICAL MILESTONES:
A recommendation was made, and consensus was reached to include the following *Customer Education and Technical Milestones* for the 334 NPA All-Services Distributed Overlay implementation.

Customer Education Milestones:

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

	regarding new overlay NPA.	(optional)
10	Update websites with information regarding new overlay NPA	All Service Providers
11	Issue second mandatory press release just prior to the mandatory dialing date and/or new overlay NPA's effective date	Commission and Service Providers that have the ability (If necessary)

Technical Milestones:

		Responsibility
1	Obtain industry test code from NANPA and activate the test number	One Service Provider Volunteer
2	Open the test code in carriers' network	All Service Providers
3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	All Service Providers
4	Ensure Highway boxes are programmed with 10-digit dialing	Industry committee co-chairs
5	Network ready for Permissive Dialing	All Service Providers
6	Create Permissive Dialing Industry Contact List	Industry committee co-chairs
	Permissive Dialing Begins	
7	Establish NPA Specific type of Trunks	All Service Providers (as needed)
8	Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Service Providers
11	Recorded announcements in Place and Tested	All Service Providers
	E911 Work Plan	
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13	Ensure SRDB table has new NPA built	E911 Providers
14	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15	Notify Statewide 911 Coordinator	Co-chairs
16	Review and Submit CLEC Trunk	All Service Providers (as needed)

	Order Requests to local provider if needed	
17	Update PSAP equipment to recognize new NPA	PSAP's
18	Trunk Orders Complete	All Service Providers (if needed)
19	Build E911 Network/Tandem Translations	E911 Providers
20	Verify if all PSAP work has been completed	PSAP's
21	Activate E911 Network/Tandem Translations	E911 Providers

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

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD
There were no additional items for discussion or statements for the record.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION
Consensus was reached that NANPA will file the petition for relief with the Commission informing them of the outcome of this relief planning meeting. The Guidelines require the petition be filed within 6-weeks (December 11, 2023) of the initial relief planning meeting unless otherwise decided by the Industry. NANPA will post a draft petition no later than November 20, 2023, and the Industry will reach consensus on the final petition at a meeting scheduled for November 27, 2023.

Cecilia reviewed the following schedule for the remaining activities until the Alabama 334 NPA petition is filed with the Commission.

Alabama 334 NPA Relief Planning Meeting & Draft Petition Schedule
November 13 – Draft Minutes Posted via NNS
November 20– Post Draft Petition via NNS
November 20 – Meeting Minutes become Final
November 27 – Draft Petition Review Meeting at 1:00 PM Central Time
December 11 – File Petition with Alabama Public Service Commission

MEETING MINUTES APPROVAL
Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry no later than November 13, 2023. Any changes or corrections are to be submitted to Cecilia via email at cmccabe@nanpa.com no later than one week after the minutes are posted to the NANP Administration System (NAS), which is available for registered users through the NANPA website. after which the minutes will become final.

The meeting was adjourned.

# # #

These minutes became final on November 20, 2023.

Attachment #1

Alabama 334 NPA
Initial Relief Planning Meeting via Web Conference
October 30, 2023
Participants

NAME	COMPANY
Dee Newman	Alabama Public Service Commission
Jeff Johnson	Alabama Public Service Commission
David Peeler	Alabama Public Service Commission
Sharon Poer	AT&T
Rita Schmitz	CenturyLink/Lumen
Matthew Anthony	CenturyLink/Lumen
Diana Gillen	CenturyLink/Lumen
Anita Yokiel	Consolidated Communications
Leslie Miklos	Consolidated Communications
Melinda Yost	DISH Wireless
Judy Geise	Frontier
Laura Simmons	Frontier
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Florence Weber	NANPA
Allyson Blevins	Sinch
Anne Chism	TDS
Paul Nejedlo	TDS
Shaunna Forshee	T-Mobile
Karen Riepenkroger	T-Mobile
Laura Dalton	Verizon
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless

Central Office Code Summary

NPA	**334**	**205**	**659**	**251**	**256**	**938**
Assigned NXXs	733	785	137	484	784	86
Reserved NXXs	0	0	0	0	0	0
Unavailable NXXs	22	15	14	15	16	14
Available NXXs	45	0	649	301	0	700
Total	800	800	800	800	800	800
Codes Assignment History	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**
334 NPA	6	7	28	27	10	21*
205 NPA	26	25	13	0	2	4*
659 NPA	N/A	17	39	52	15	15*
251 NPA	10	10	21	42	27	14*
256 NPA	8	12	18	35	13	10*
938 NPA	1	10	15	10	21	19*
*As of October 27, 2023						
Exhaust:	Based on the October 2023 NRUF and NPA Exhaust Analysis, the 334 NPA is projected to exhaust in 3Q2026. Based on the October 2023 NRUF and NPA Exhaust Analysis, the 205/659 NPA is projected to exhaust in 4Q2044, the 251 NPA is projected to exhaust in 4Q2035 and the 256/938 NPA is projected to exhaust in 3Q2043.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS				
ST/NPA:	**AL 334**	**AL 205/659**	**AL 251**	**AL 256/938**
MEETING DATE:	**10/30/2023**	**10/30/2023**	**10/30/2023**	**10/30/2023**
RATE CENTERS				
# Total	**96**	**70**	**42**	**91**
# Mandatory	**1**	**37**	**15**	**91**
# Mandatory-Single Service Providers (M*)	**0**	**0**	**0**	**0**
# Optional	**82**	**33**	**21**	**0**
# Excluded	**13**	**0**	**6**	**0**
BLOCKS ASSIGNED				
# Total	**352**	**388**	**252**	**553**
(For time period 11/1/22 - 10/27/23)				
BLOCKS AVAILABLE				
#Total	**444**	**375**	**169**	**427**
(As of preparation date: 10/27/23)				
CODES ASSIGNED				
# Total	**22**	**21**	**14**	**31**
# for Pool Replenishment	**18**	**18**	**11**	**28**
# for Dedicated Customers	**0**	**1**	**0**	**0**
# for LRNs	**4**	**2**	**3**	**3**
(For time period 11/01/22 - 10/27/23)				
CODES FORECASTED				
# Total	**20**	**22**	**8**	**38**
# for Pool Replenishment and Dedicated Customers	**20**	**22**	**8**	**38**
# for LRNs	**0**	**0**	**0**	**0**
(For the next twelve months as of: 10/27/23)				