



March 30, 2012



By Overnight Courier

Mr. Jeff R. Derouen, Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

RECEIVED

APR 02 2012

PUBLIC SERVICE  
COMMISSION

Re: Application of the North American Numbering Plan  
Administrator, on behalf of the Kentucky  
Telecommunications Industry, for Relief of the 270  
Numbering Plan Area

Dear Mr. Derouen:

2012-00129

Neustar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby submits it above-captioned Application for filing with the Kentucky Public Service Commission. Enclosed please find the original and ten copies of the Application. Please date-stamp the return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,

Kimberly Wheeler Miller  
Counsel, North American Numbering Plan  
Administrator, Neustar, Inc.  
[Kimberly.miller@neustar.biz](mailto:Kimberly.miller@neustar.biz)

COMMONWEALTH OF KENTUCKY

Before the  
PUBLIC SERVICE COMMISSION  
Frankfort, Kentucky 40602

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APR 03 2012

PUBLIC SERVICE  
COMMISSION

\_\_\_\_\_) )  
Application of the North American Numbering ) )  
Plan Administrator, on behalf of the Kentucky ) Case No. \_\_\_\_\_  
Telecommunications Industry, for Relief of the ) )  
270 Numbering Plan Area ) )  
\_\_\_\_\_) )

**APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN  
ADMINISTRATOR, ON BEHALF OF THE KENTUCKY TELECOMMUNICATIONS  
INDUSTRY**

NeuStar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Kentucky under the North American Numbering Plan and on behalf of the Kentucky telecommunications industry (“Industry”),<sup>1</sup> requests that the Public Service Commission of Kentucky (“Commission”)<sup>2</sup> approve the Industry’s consensus<sup>3</sup> decision to recommend to the Commission an all-services distributed overlay as the preferred form of relief for the 270 numbering plan area (“NPA”).<sup>4</sup> The Industry submits its overlay recommendation to the Commission based upon NANPA’s projections that

<sup>1</sup> The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 270 area code in Kentucky.

<sup>2</sup> The Federal Communications Commission (“FCC”) delegated authority to the states, including Kentucky, to review and approve NPA relief plans. See 47 C.F.R. § 52.19.

<sup>3</sup> Consensus as used in this document means: 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. (ATIS Operating Procedures, section 7.1, version 5.1, January 31, 2011 (see Exhibit B, page 4).

<sup>4</sup> As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

absent NPA relief, the supply of central office codes (often referred to as “CO” or “NXX” codes) in the 270 NPA will exhaust during the first quarter of 2015. In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 270 NPA, the Industry requests that the Commission also approve the recommended 13-month implementation schedule.

## **I. BACKGROUND**

The October 2011 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“2011 NRUF Report”) indicates that the 270 NPA will exhaust during the first quarter of 2015.<sup>5</sup> Based upon the projected exhaust date, NANPA notified the Commission and the Industry on December 12, 2011 that NPA relief needed to be addressed. NANPA met with members of the Industry on January 5, 2012 to solicit Industry input on the proposed relief plans and again on February 23, 2012 to discuss the proposed relief alternatives and to allow the industry to arrive at a consensus on the relief alternative to recommend to the Commission.<sup>6</sup>

Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the February 23, 2012 meeting. The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of three area code

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<sup>5</sup> October 2011 NRUF and NPA Exhaust Analysis (“2011 NRUF Report”). The 2011 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

<sup>6</sup> In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Sep. 30, 2011) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at [www.atis.org/inc/incguides.asp](http://www.atis.org/inc/incguides.asp).

relief options, which consisted of an all services overlay and two two-way area code splits, one of which was proposed by an Industry member. Descriptions of the three alternatives are:<sup>7</sup>

- Alternative #1 – All-Services Overlay: A new NPA code would be assigned to the same geographic area as the existing 270 NPA. This alternative has a projected life of 65 years. Customers would retain their current telephone numbers. Ten-digit dialing by all customers between and within area codes in the area covered by the new area code would be required.
- Geographic Split: In a geographic split, the NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted
  - In Alternative #2, the proposed split boundary line generally runs north to south along rate center boundaries putting Henderson, Slaughters, Drakesboro, Sharon Grove and Guthrie among the rate centers on the western side. The Stanley, Calhoun, Centertown, Rochester, and Russellville rate centers are among those on the eastern side. The eastern side, referred to as Area A, has a projected NPA life of 62 years to exhaust and Area B, the western side, has a projected NPA life of 68 years to exhaust.
  - In Alternative #3, the proposed split boundary line runs north to south along rate center boundaries similar to that of Alternative #2, but placing the Bremen, Central City, Drakesboro, Greenville, Sharon Grove, Elkton, Trenton and Guthrie rate centers on the eastern side of the boundary line. The Hebbardsville rate center switches to the western side of the boundary line. The eastern side, referred to as Area A, has a projected NPA life of 52 years to exhaust and Area B, the western side, has a projected NPA life of 82 years to exhaust.

The February 23, 2012 meeting attendees reviewed the attributes of the relief alternatives described above. The Industry members reached consensus to recommend Alternative #1, the all-services distributed overlay plan, to the Commission as the preferred method of relief for the 270 NPA.

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<sup>7</sup> The IPD is attached as Exhibit B. The February 23, 2012 meeting minutes are attached as Exhibit A. The IPD and February 23 meeting minutes contain further descriptions and illustrative maps of the alternatives considered by the Industry participants.

The Industry chose the all-services distributed overlay plan over the geographic split alternatives as the preferred method of relief because it would be the least disruptive to customers, making customer education easier and resulting in less confusion. Overlays do not require existing customers to change their telephone numbers and no cities or other communities of interest would be split by a new NPA boundary. An overlay, as opposed to a split, does not implicate implementation issues due to portability complexities and is easier for service providers to implement and maintain from a translations, billing and service order perspective. The all-services distributed overlay also would treat all customers equally, unlike the geographic split alternative, which would require some, but not all, customers to incur expenses (such as advertising and stationery changes) associated with changing their telephone numbers. An overlay would not require the Commission to determine who would be assigned the new NPA. An overlay provides the most efficient distribution of numbering resources by allowing assignments to follow demand. The Industry noted, however, that the overlay would subject customers to 10 digit dialing within the area code.

The Industry noted that although the geographic split depicted in Alternatives #1 and #2 would maintain seven-digit dialing between parties on the same side of the split line, it would require approximately half of the customers in the 270 NPA to change their telephone numbers. It would cause businesses located within the area receiving the new NPA to incur the financial expenses related to changing their advertising and stationery to reflect the number change. The split alternatives would divide communities of interest. Alternative #2 disrupts Logan Telephone Coop's optional calling area, but Alternative #3, which allows Logan Telephone Coop to retain seven-digit dialing in its optional area calling service, creates two NPAs with a difference in projected life of 30 years. Severe imbalances, defined as greater than 10 years, are not permitted

by the NPA Relief Planning Guidelines.<sup>8</sup> Customers in the new area code must notify friends, family and business associates of the number change.

## II. DESCRIPTION OF THE RECOMMENDED RELIEF ALTERNATIVE

The recommended all-services distributed overlay, Alternative #1, would superimpose a new NPA over the same geographic area covered by the existing 270 NPA. All existing customers would retain the 270 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require ten-digit dialing for all calls within and between the 270 NPA and the new NPA.<sup>9</sup> CO code assignments would be made from the new overlay area code beginning one month after mandatory dialing.

Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementing the all-services distributed overlay. The schedule, provided below, includes recommended intervals for each implementation phase, which are dependent upon the Commission's adoption of the recommended overlay as the means of relief for the 270 NPA.

### Recommended Implementation Schedule for an All-Services Distributed Overlay

EVENT	TIMEFRAME
Network preparation period	6 months
Permissive 10-digit dialing and customer education period (calls within the 270 NPA can be dialed using 7 or 10 digits) Mandatory dialing begins at the end of the Permissive Dialing Period	6 months
First code activation after end of permissive dialing period (effective date for CO codes from the new overlay NPA)	1 month (after mandatory dialing)
Total implementation interval	13 months

<sup>8</sup> See "Discussion of Pros and Cons of Relief Alternatives," on pages 5-8 of Exhibit A for a list of specific reasons given by the industry for choosing the overlay over the split alternative.

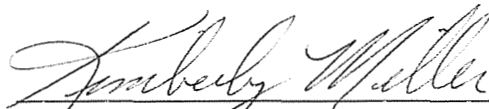
<sup>9</sup> 47 C.F.R. § 52.19(c)(3)(ii).

Adhering to the proposed implementation schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

### III. CONCLUSION

The Industry respectfully requests that the Commission issue an order approving the Industry's choice for relief for the 270 NPA, an all-services distributed overlay. The Industry also requests that the order approve the recommended relief implementation schedule to ensure the quickest implementation of relief possible and facilitate customer education.

Respectfully submitted,



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Filed April 2, 2012

# **EXHIBIT A**



**KENTUCKY – 270 NPA  
INITIAL RELIEF PLANNING MEETING  
VIA CONFERENCE CALL  
FINAL MINUTES  
February 23, 2012**

**WELCOME, INTRODUCTIONS & AGENDA REVIEW**

Wayne Milby, Senior NPA Relief Planner – NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment 1. Wayne mentioned there would be a quality survey sent via email to those attending today's call. Wayne then reviewed the agenda and NANPA's role and responsibilities.

**NANPA's ROLE AND RESPONSIBILITIES**

Wayne reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA. (The October 2011 NRUF projects the 270 NPA will exhaust 1Q2015.)
- Facilitate a Pre-IPD conference call with the industry six weeks prior to the NPA Relief Planning meeting.
- Distribute the Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting.
- Review the relief alternatives presented in the IPD
- Check to see if there are any additional relief alternatives from the participants
- Discuss the alternatives and list some pros and cons for each alternative
- Then, through a process of elimination of all but one alternative, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the KY PSC.
- Also determine any additional items to include in a filing with the KY PSC such as dialing plan and implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting or the date set by the Industry.

**REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES**

Wayne stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Wayne 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.

Wayne reviewed the most pertinent items from the Industry Numbering Committee (INC) NPA Code Relief and Planning and Notification Guidelines for this meeting as follows:

- The NPA Relief Planning, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: ([www.atis.org/inc/incguides.asp](http://www.atis.org/inc/incguides.asp)).
- The most pertinent items in the guidelines concerning this meeting are the relief options/alternatives shall cover a period of five years beyond the forecasted exhaust of the existing area code.
- If there is a split, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.
- The guidelines also state for split alternatives, that a difference in NPA lifetimes of more than 10 years shall be avoided.
- Relief should be in place at least three months prior to the exhaust of the existing NPA.

#### **STATUS OF KENTUCKY 270 NPA**

Beth Sprague, Regional Director – NANPA CO Code Administration, reviewed the status of the 270 NPA, which reflects a total of 750 NXX codes currently assigned. As of February 22, 2012, 33 NXX codes remain available for assignment in the 270 NPA, while 17 additional NXX codes are classified as unavailable (See Attachment 2). Also the October 2011 Number Resource Utilization Forecast (NRUF) projects exhaust of the 270 NPA during the First quarter 2015.

The annual NXX code assignment history in the 270 NPA has been as follows:

2009 assignments: 8 codes  
2010 assignments: 14 codes  
2011 assignments: 20 codes  
2012 assignments year to date: 4 codes

#### **STATUS OF ONE-THOUSAND-BLOCK POOLING IN 270 NPA**

Cecilia McCabe, NeuStar Number Pooling Implementation Manager, stated number pooling started in the 270 NPA on November 18, 2003. Out of the 170 rate centers, there are 135 rate centers that are mandatory pooling, 35 mandatory-single service provider rate centers, 0 rate centers that are optional pooling and 0 rate centers are excluded from pooling. There have been 187 blocks assigned in the last 12 months and 2227 blocks are available as of February 22, 2012. Pooling has assigned 24 codes in the last twelve months; 9 for pool replenishment and 15 for LRNs. The forecasted need for codes for the next twelve months is 0 codes. (See attachment 3).

#### **PRE-IPD CONFERENCE CALL RE-CAP**

Wayne provided a recap of the pre-IPD conference call held January 5, 2012. The purpose of this pre-IPD call was to solicit industry input on the proposed relief plans and to discuss additional alternative relief plans for consideration prior to the issue of the IPD. One additional relief alternative was suggested and added to the IPD distribution on

January 24, 2012. Informal meeting notes resulting from the pre-IPD industry conference were posted to NANPA's NAS-NNS service on January 6, 2012. Wayne noted the main purpose of that call was to obtain additional relief alternatives for consideration and he stated the industry will still have the opportunity to propose additional relief alternatives during the call today.

### **REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 270 NPA**

Wayne reviewed the Initial Planning Document (IPD) distributed prior to the meeting.

#### **General Facts - Kentucky:**

The population of Kentucky was 4,041,769 in 2000 compared to a population of 4,339,367 in 2010, an increase of 7.4%. Kentucky encompasses an area of 40,411 square miles and is bordered by Indiana and Ohio on the north, Virginia and West Virginia on the east, Tennessee on the south and Missouri and Illinois on the west. The state flower is the Goldenrod and the state bird is the Cardinal.

Kentucky currently has 4 active NPAs. The 270 NPA was created in April 1999 with a split of the 502 NPA. The 270 NPA covers the western half of the Commonwealth of Kentucky. NPA Relief for the 270 NPA was first initiated in April 2001 when the projected exhaust date was 2Q2003. On 5/31/07 the KY PSC ordered a 2-way geographic split when the projected exhaust date was 4Q2008. Coincidentally, the FCC also granted additional delegated pooling authority on 5/31/07. On 12/13/10, the KY PSC vacated the decision to implement the geographic split when the projected exhaust date was 3Q2014.

Wayne briefly reviewed Appendix E to the NPA Code Relief Planning Guidelines which provides the General Attributes of Common Relief Alternatives.

The following maps and related documents were reviewed:

Map showing location of all NPAs in Kentucky

NPA 270 County Map

NPA 270 table of the population of each County in the 270 NPA with the percentage change in population from 2000 to 2010

NPA 270 Rate Centers & Cities with a Population > 10 K Map

NPA 270 Rate Center & Major Highways Map

NPA 270 Rate Center Map

NPA 270 Rate Center & County Map of the 170 rate centers

NPA 270 Rate Center & LATA Map

Rate Center Table

Code Holder Table

Wayne stated the IPD includes an all services distributed overlay (Alternative #1) and two 2-way geographic split alternatives (Alternatives #2 and #3) He reviewed them as follows:

<b>OVERLAY ALTERNATIVE</b>
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ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 270 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 270 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 733  
Total rate centers = 170  
Area Code Life in Years = 65

<b>NPA SPLIT ALTERNATIVE</b>
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The exhausting NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

ALTERNATIVE #2 – NPA SPLIT

The proposed split boundary line runs north-to-south along rate center boundaries where Henderson, Slaughters, Drakesboro, Sharon Grove and Guthrie are some of the rate centers west of the boundary line and Stanley, Calhoun, Centertown, Rochester, and Russellville are among the rate centers east of the boundary line.

AREA "A"

Total CO Codes = 376  
Total rate centers = 87  
Area Code Life in Years = 62

AREA "B"

Total CO Codes = 357  
Total rate centers = 83  
Area Code Life in Years = 68

**INDUSTRY NPA SPLIT ALTERNATIVE THAT DOES NOT MEET GUIDELINES**

ALTERNATIVE #3 – NPA SPLIT

The proposed split boundary line runs north-to-south along rate center boundaries where Hebbardsville, Slaughters, Madisonville, Nortonville, Hopkinsville and Oak Grove are some of the rate centers west of the boundary line and Stanley, Calhoun, Bremen, Greenville, Elkton and Trenton are among the rate centers east of the boundary line.

AREA "A"

Total CO Codes = 409  
 Total rate centers = 94  
 Area Code Life in Years = 52

AREA "B"

Total CO Codes = 324  
 Total rate centers = 76  
 Area Code Life in Years = 82

**INDUSTRY RECOMMENDED ALTERNATIVES**

Wayne asked the industry participants if there were additional suggestions for relief alternatives. There were no additional alternatives proposed during the relief planning meeting.

**DISCUSSION OF PROS AND CONS OF RELIEF ALTERNATIVES**

A general discussion ensued regarding the Pros and Cons of each relief alternative and the industry agreed to the following:

**The following Pros and Cons were listed for the Alternatives:**

**Overlay Pros and Cons:**

Pros:

Alternative #					
				1	
			X	1	All existing customers would retain the 270 area code and would not have to change their telephone numbers.
			X	2	Does not discriminate against customers on different sides of a boundary line as does a geographic split
			X	3	Less customer confusion and easier education process
			X	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.
			X	5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
			X	6	Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth

				X	7 No need for synchronization of old and new NPAs in NPAC databases
				X	8 Minimizes call routing issues, especially with ported numbers
				X	9 Easier for service providers to implement/maintain from a translations, billing and service order system perspective
				X	10 Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table
				X	11 The PSC would not have to decide which side gets the new NPA, so no winners and losers.
				X	12 Does not split cities or counties into different area codes.
				X	13 Keeps communities of interest in tact.
				X	14 No impact on some wireless carriers that have to reprogram handsets manually
				X	15 No technical impacts to number portability, text messaging or multimedia messaging
				X	16 Meets the requirements of the INC NPA Code Relief Planning and Notification Guidelines.
				X	17 No impact to non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery reward programs, pharmacies, National Missing Children Database, etc.

**Overlay Pros and Cons:**

Cons:

Alternative #					
				1	
				X	1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 270 NPA and the new NPA.
				X	2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
				X	3 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.

**NPA Split Pros and Cons**

Pros:

Alternative #				
		3	2	
		X	X	1 Maintains seven digit dialing for local calls within the same NPA
		X	X	2 Approximately ½ of customers would experience no change in telephone numbers if they keep the 270 NPA
			X	3 Projected life-spans of NPAs are more balanced
		X		4 Allows Logan Tel to retain 7 digit dialing in their optional area calling service

**NPA Split Pros and Cons:**

Cons:

Alternative #				
		3	2	
		X	X	1 Requires approximately ½ of 270 NPA customers to change their telephone numbers thus creating winners and losers.
			X	2 Heavily disrupt Logan Tel's optional calling area.
		X		3 Projected lives are severely imbalanced, 30 years difference, and could become more imbalanced if demand changes in future years. Furthermore, does not meet the NPA Relief Planning and Notification Guidelines.
		X	X	4 Split may impact service providers operating territory between two NPAs.
		X	X	5 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
		X	X	6 All 270 NPA customers previously went through a split 13 years ago and half will have to change again
		X	X	7 Difficult PSC decision on which side retains the old NPA.
		X	X	8 Longer time period needed for service providers to implement this type of relief.
		X	X	9 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
		X	X	10 More complicated and costly to implement for service providers in their billing, translations and database systems.
		X	X	11 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
		X	X	12 Negative impact to directories and directory assistance databases and other non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery stores, pharmacies and the National Missing Children's database that must be updated

				with customers' new telephone numbers.
		X	X	13 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
		X	X	14 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
		X	X	15 Split requires significant changes to service provider's operational support systems and network elements.
		X	X	16 Splits cause customer confusion with caller ID during implementation.
		X	X	17 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
		X	X	18 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
		X	X	19 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
		X	X	20 This split may disrupt the service provider's host-remote switch arrangement.
		X	X	21 Splits require the 800/SMS database to be updated.
		X	X	22 Splits reduce the geographic area served by one area code.
		X	X	23 Splits the city(s), counties or legislative districts into different area codes.
		X	X	24 Splits communities of interest.
		X	X	25 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 old area code during permissive dialing.
		X	X	26 The projected lives of the NPAs for any split alternative for 270 relief may be inflated and appear to last longer than they really will because NANPA's model does not take into account the significant amount of 7 digit local dialing across NPA boundaries within Kentucky and to other states. This dialing arrangement limits where central office codes can be assigned within all impacted NPAs, resulting in a less efficient use of resources.



**CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES**

After discussion and review of the above listed Pros and Cons, proposals were made and consensus reached to eliminate the following Alternatives:

A proposal was made and consensus was reached to eliminate Alternatives #2 and 3 due to the Cons listed above.

**CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION**

After further discussion, a proposal was made and consensus reached to recommend Alternative #1, the all services distributed overlay, to the Kentucky Public Service Commission as the industry’s preferred method of relief for the 270 NPA.

**CONSENSUS ON DIALING PLAN (ALTERNATIVE #1)**

Consensus was reached to recommend the following dialing plan for Alternative #1:

**OVERLAY DIALING PLAN FOR ALTERNATIVE #1**

<b>Type of Call</b>	<b>Call Terminating in</b>	<b>Dialing Plan</b>
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 <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

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

**CONSENSUS ON IMPLEMENTATION INTERVALS**

A recommendation was made and consensus reached to recommend to the Commission a 13-month schedule for implementation of the overlay.

The recommended schedule is as follows:

**OVERLAY IMPLEMENTATION SCHEDULE FOR ALTERNATIVE #1**

<b>EVENT</b>	<b>TIMEFRAME</b>
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 270 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

**STATEMENTS FOR THE RECORD**

No statements for the record were submitted.

**NANPA FILING INDUSTRY EFFORTS WITH KENTUCKY PSC**

Consensus was reached that NANPA will prepare a draft of the petition that will be filed with the Kentucky Public Service Commission (“PSC”) informing them of the outcome of this relief meeting. The draft filing will be reviewed by the industry on the conference call that will be held to approve these minutes. The INC guidelines reflect the relief petition is to be filed with the regulator within 6 weeks of the initial relief planning meeting unless otherwise agreed.

*During the March 21, 2012 call to review and approve the draft minutes and draft petition, consensus was reached to approve the draft petition and draft minutes, with edits that have been incorporated in these final documents, and file the Petition with the KY PSC no later than April 5, 2012.*

**REVIEW OF DRAFT MEETING MINUTES & KENTUCKY PSC FILING**

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by March 8, 2012 and the draft commission filing distributed to the industry by March 15, 2012. Consensus was also reached to conduct a conference call to review and approve the draft minutes and draft filing to the Kentucky PSC on March 21, 2012.

Details of the call are as follows:

**Date: March 21, 2012**

**Time: 2:00 PM ET; 1:00 PM CT; 12:00 PM MT; 11:00 AM PT**

**Dial-in number: 630-827-6799**

**Pass code: 8831535#**

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To join the online meeting  
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1. Go to <https://neustar.webex.com/neustar/j.php?ED=189489752&UID=1268262982&PW=NNzhmYjBIYjU0&RT=MIMxMO%3D%3D>
2. If requested, enter your name and email address
3. If a password is required, enter the meeting password: 5555
4. Click "Join".

Adjourned

###

**KENTUCKY – 270 NPA  
INITIAL RELIEF PLANNING MEETING  
Meeting Attendees  
February 23, 2012**

NAME	COMPANY
Marta Antelo	AT&T
DeeAnn Arnold	AT&T
Mary Ann Palmisano	AT&T
Rita Schmitz	Century Link
Eric Bowman	Kentucky PSC
Kyle Willard	Kentucky PSC
Jeb Pinney	Kentucky PSC
Jim Stevens	Kentucky PSC
Greg Hale	Logan Telephone Coop
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA CO Code Admin
Linda Hymans	NeuStar Pooling Regulatory
Cecilia McCabe	NeuStar Pooling Implementation
Shaunna Forshee	Sprint
Paul Nejedlo	TDS Telecom
Natalie McNamer	T-Mobile
Jena Downs	Verizon
Yun Lee	Verizon
Dana Crandall	Verizon Wireless
Paula Hustead	Windstream
Bea McKoy	Windstream (US LEC)



<b>POOLING STATISTICS</b>	
<i>Provided By: Cecilia McCabe</i>	
<b>ST/NPA:</b>	KY 270
<b>MEETING DATE:</b>	2/23/2012
<b>MEETING SUBJECT:</b>	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
<b>POOL START DATE (PSD)</b>	11/18/2003
<b>RATE CENTERS</b>	
<b># Total</b>	170
<b># Mandatory</b>	135
<b># Mandatory-Single Service Providers (M*)</b>	35
<b># Optional</b>	0
<b># Excluded</b>	0
<b>BLOCKS ASSIGNED</b>	
<b># Total</b>	187
<i>(For time period 02/01/11-02/22/12)</i>	
<b>BLOCKS AVAILABLE</b>	
<b>#Total</b>	2227
<i>(As of preparation date: 02/22/12)</i>	
<b>CODES ASSIGNED</b>	
<b># Total</b>	24
<b># for Pool Replenishment</b>	9
<b># for Dedicated Customers</b>	0
<b># for LRNs</b>	15
<i>(For time period 02/01/11-02/22/12)</i>	
<b>CODES FORECASTED</b>	
<b># Total</b>	0
<b># for Pool Replenishment and Dedicated Customers</b>	0
<b># for LRNs</b>	0
<i>(For the next twelve months as of: 02/22/12)</i>	

# **EXHIBIT B**



January 24, 2012

To: Kentucky 270 NPA Code Holders and Other Industry Members

Re: Initial Planning Document to Plan Relief for the 270 NPA in Kentucky

---

As stated in our memo dated December 12, 2011, the 270 area code in Kentucky is projected to exhaust during the 1Q2015. Enclosed is the Initial Planning Document (IPD) for your review prior to the February 23, 2012 scheduled industry NPA Relief Planning conference call meeting.

The IPD contains the projected life of several possible relief alternatives. NANPA welcomes the submission of additional relief alternatives from interested parties. While additional relief alternatives will also be accepted during the February meeting, advance submission is recommended to allow interested parties adequate time to review them prior to the meeting.

Accordingly, on February 23 2012, NANPA will convene an industry NPA relief planning conference call to develop a recommended relief plan for the 270 NPA. The objective of this meeting is to secure consensus among members of the Kentucky Telecommunications Industry on a single plan for relief of the 270 NPA. The resulting relief plan will be filed with the Kentucky Public Service Commission for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (ATIS) will be applied in the decision-making efforts (See attached copy).

Because the impacts of NPA relief planning are so significant, NANPA strongly encourages your participation at the February 23, 2012 meeting. Past experience demonstrates that this could be the only meeting of the industry before a decision is reached on a recommended relief plan. The details of the meeting are as follows:

**Date: February 23, 2012**

**Time: 1:00 PM ET; 12:00 PM CT; 11:00 AM MT; 10:00 AM PT**

**Dial-in number: (630) 827-6799**

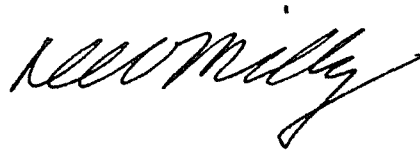
**Pass code: 8831535#**

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you received this notice from someone else, and would like to receive additional information in the future about the 270 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to [www.nanpa.com](http://www.nanpa.com), then selecting NAS Login and then selecting New Registration and following the sign-up process.

**If you plan on attending the NPA Relief Planning conference call on February 23, 2012 please let me know by sending an email to [wayne.milby@neustar.biz](mailto:wayne.milby@neustar.biz). This will help us to determine if all industry parties will be represented at the 270 NPA Relief Planning meeting.**

If you have any questions regarding the above relief planning conference call, any aspect of relief planning, or have any questions about receiving notices and documents via NAS-NNS. Please do not hesitate to contact me on 804-795-5919 or via email at the address above.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Wayne Milby". The signature is written in a cursive style with a large, prominent initial "D".

D. Wayne Milby  
Senior NPA Relief Planner – NANPA  
e-mail: [wayne.milby@neustar.biz](mailto:wayne.milby@neustar.biz)

CC: Eric Bowman – KY PSC Staff

Attachments



**KENTUCKY - NPA 270  
INITIAL RELIEF PLANNING MEETING  
VIA CONFERENCE CALL  
Dial-In Number: 630-827-6799, Pass code 8831535#**

**FEBRUARY 23, 2012  
1:00 PM – 4:00 PM (ET)**

**AGENDA**

- 1:00**      **Welcome & Introductions**  
**NANPA's Role & Responsibilities**  
**Minutes & Statements for the Record**  
**Industry Guidelines/Relief Alternatives**  
**Review Code Assignment History**  
**Re-cap Pre-IPD Conference Call**  
**Review Initial Planning Document**  
**Additional Relief Alternatives**
- 2:30**      **Break**
- 2:45**      **Identify Pros & Cons of Alternatives**  
**Elimination of Alternatives**  
**Consensus on Recommended Relief Alternative**  
**Consensus on Dialing Plan**  
**Consensus on Implementation Intervals**  
**Statements for the Record**  
**Consensus on NANPA Filing Industry Efforts with**  
**Kentucky PSC**
- Set Date for Conference Call to Review Meeting Notes**  
**and Draft Petition**
- 4:00**      **Adjourn**

# INDUSTRY CONSENSUS PROCESS

1/31/2011

ATIS OPERATING PROCEDURES

VERSION 5.1

## 7 RESOLUTION PROCESS

### 7.1 Consensus

Consensus is the method used by the ATIS Forums and Committees to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures.

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. 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 committee and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.



<b>POOLING STATISTICS</b>	
<i>Provided By: Cecilia McCabe</i>	
<b>ST/NPA:</b>	KY 270
<b>MEETING DATE:</b>	2/23/2012
<b>MEETING SUBJECT:</b>	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
<b>POOL START DATE (PSD)</b>	11/18/2003
<b>RATE CENTERS</b>	
<i># Total</i>	170
<i># Mandatory</i>	133
<i># Mandatory-Single Service Providers (M*)</i>	37
<i># Optional</i>	0
<i># Excluded</i>	0
<b>BLOCKS ASSIGNED</b>	
<i># Total</i>	153
<i>(For time period 02/01/11-01/24/12)</i>	
<b>BLOCKS AVAILABLE</b>	
<i>#Total</i>	2171
<i>(As of preparation date: 01/24/12)</i>	
<b>CODES ASSIGNED</b>	
<i># Total</i>	20
<i># for Pool Replenishment</i>	9
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	11
<i>(For time period 02/01/11-01/24/12)</i>	
<b>CODES FORECASTED</b>	
<i># Total</i>	4
<i># for Pool Replenishment and Dedicated Customers</i>	0
<i># for LRNs</i>	4
<i>(For the next twelve months as of: 01/24/12)</i>	

**NPA RELIEF PLANNING MEETING AID**

**INDUSTRY DEVELOPED PROS AND CONS FOR RELIEF ALTERNATIVES  
FROM RECENT NPA RELIEF PLANNING MEETINGS**

**Overlay Pros and Cons:**

Pros:

Alternative #				
				1
				1 All existing customers would retain the ___ area code and would not have to change their telephone numbers.
				2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
				3 Easier education process
				4 Less customer confusion and easier education process
				5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
				6 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
				7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
				8 Customers do not have to update personal printed material such as checks and websites, etc.
				9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth
				10 No need for synchronization of old and new NPAs in NPAC databases
				11 Minimizes call routing issues, especially with ported numbers
				12 Easier for service providers to implement from a translations, billing and service order system perspective
				13 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
				14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
				15 Does not split cities or counties into different area codes.
				16 Keeps communities of interest in tact.
				17 No impact on some wireless carriers that have to reprogram handsets manually
				18 No technical impacts to number portability, text messaging or multimedia messaging

**Overlay Pros and Cons:**

Cons:

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

**NPA Split Pros and Cons**

Pros:

Alternative #					
		3	2		
					1 Customers retain seven-digit dialing for all calls within the same NPA.
					2 Maintains seven digit dialing for local calls within the same NPA
					3 Approximately ½ of customers would experience no change if they keep the XXX NPA
					4 Projected lives are balanced
					5 The projected lives are slightly more balanced than alternative # .
					6 The projected lives are more balanced
					7 This alternative allows _____ to maintain operations on one side of the split line.
					8 _____ operating territory is kept in tact
					9 Retains the geographic identity with one area code.
					10 Keeps the cities on both sides of the split lines intact.

**NPA Split Pros and Cons:**

Cons:

Alternative #				
		3	2	
				1 Splits _____ operating territory between two NPAs
				2 _____ EAS calling is heavily disrupted
				3 Projected lives are imbalanced, _ years difference, least balanced of the split alternatives, could become more imbalanced if demand changes in future years
				4 Requires approximately ½ of ___ NPA customers to change their telephone numbers thus creating winners and losers.
				5 Requires NPA change for approximately ½ of ___ NPA customers
				6 Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
				7 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
				8 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
				9 All ___ NPA customers previously went through a split _ years ago and half will have to change again
				10 Difficult PSC/PUC decision on which side retains the old NPA.
				11 Longer time period needed for service providers to implement this type of relief.
				12 Customers that change must contact friends, family and business associates with the telephone changes.
				13 More complicated and costly to implement for service providers in their billing, translations and database systems.
				14 Splits affect alarm systems and E-911 databases.
				15 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
				16 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
				17 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
				18 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
				19 Split requires significant challenges to service provider's operational support systems and network elements.
				20 Splits cause customer confusion with caller ID during

						implementation.
						21 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
						22 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
						23 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
						24 This split disrupts the SP's host-remote switch arrangement.
						25 Splits require the 800/SMS database to be updated.
						26 Splits reduce the geographic area served by one area code.
						27 Splits the city(s), counties or legislative districts into different area codes.
						28 Splits communities of interest.
						29 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 old area code during permissive dialing.

**Concentrated Overlay Pros and Cons:**

Pros:

Alternative #						
						1 Does not impact as many customers at once
						2 Only area of greatest code usage is overlaid (initial impact)

**Concentrated Overlay Pros and Cons:**

Cons:

Alternative #						
						1 Splits host-remote arrangements for _____ Telco.
						2 Very short life before expansion is required
						3 A number of EAS routes cross this boundary
						4 Will require two customer education notices, the second when the overlay is expanded to cover entire area code; two full relief efforts.
						5 Customer confusion and education problems since it will have to be expanded in ____ years.
						6 Service providers that use one switch for multiple NPAs: a conc. Overlay is difficult to implement with complicated translations
						7 Concentrated overlay boundary splits time zone



					8	Would have to start implementation immediately and come back in a short amount of time to expand the overlay
					9	Discriminates against customers inside the overlay area that have to dial 10-digits immediately vs. those that get to keep 7-digit dialing outside of the concentrated overlay.
					10	Requires judgment in projecting exhaust of specific rate centers that may be false over time.

### OVERLAY DIALING PLAN MEETING AID

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 <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

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

### OVERLAY IMPLEMENTATION SCHEDULE MEETING AID

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 270 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

### GEOGRAPHIC SPLIT DIALING PLAN MEETING AID

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 <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

### GEOGRAPHIC SPLIT IMPLEMENTATION SCHEDULE MEETING AID

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period <i>(Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation <i>(Effective date for codes from the new NPA)</i>	End of Recording Period
Total Implementation Interval	15 months

**FINAL**  
**INITIAL PLANNING DOCUMENT**  
**FOR**  
**RELIEF OF THE**  
**KENTUCKY - 270 NPA**

**NORTH AMERICAN NUMBERING PLAN ADMINISTRATION**

**WAYNE MILBY**  
**SENIOR NPA RELIEF PLANNER**

January 24, 2012

## 270 NPA Background Information

### **General Facts:**

The population of Kentucky was 4,041,769 in 2000 compared to a population of 4,339,367 in 2010, an increase of 7.4%. Kentucky encompasses an area of 40,411 square miles and is bordered by Indiana and Ohio on the north, Virginia and West Virginia on the east, Tennessee on the south and Missouri and Illinois on the west. The state flower is the Goldenrod and the state bird is the Cardinal.

Kentucky currently has 4 active NPAs. The 270 NPA was created in April 1999 with a split of the 502 NPA. The 270 NPA covers the western half of the Commonwealth of Kentucky. NPA Relief for the 270 NPA was first initiated in April 2001 when the projected exhaust date was 2Q2003. On 5/31/07 the KY PSC ordered a 2-way geographic split when the projected exhaust date was 4Q2008. Coincidentally, the FCC also granted additional delegated pooling authority on 5/31/07. On 12/13/10, the KY PSC vacated the decision to implement the geographic split when the projected exhaust date was 3Q2014.

### **General Facts and Assumptions**

The October 2012 NRUF NPA Exhaust Projection is 1Q2015 and reflects an annualized central office code growth of 12 NXX codes or 1.0 code per month for the 270 NPA.

During 2012 the total code assignments through January 23<sup>rd</sup> were 0 codes less 0 returns = 0 codes per month.

- Assignment History: 2011 – 20-5 assigned; 2010 – 14-0 assigned; 2009 – 8-2 assigned

There are 57 code holders in the 270 NPA

The 270 NPA has 170 rate centers: 11 rate centers have one NXX code assigned, 3 rate centers have two NXX codes assigned and one rate center has 39 codes assigned (Owensboro, Kentucky).

Thousand-Block-Number Pooling started in November 2003. There are 133 rate centers that have mandatory pooling, 37 mandatory-single service provider rate centers, 0 rate centers that have optional pooling and 0 rate centers that are excluded from pooling.

As of January 23, 2012, the 270 NPA has 37 codes available and 17 unavailable codes.

The 270 NPA is in the 462, 464, 468 and 470 LATAs.

### **Dialing Procedures for 270 NPA**

Type of call	Call terminating to	Dialing plan
Local call	Home NPA (HNPA)	7-digits (NXX-XXXX)
	Foreign NPA (FNPA)	7-digits (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)

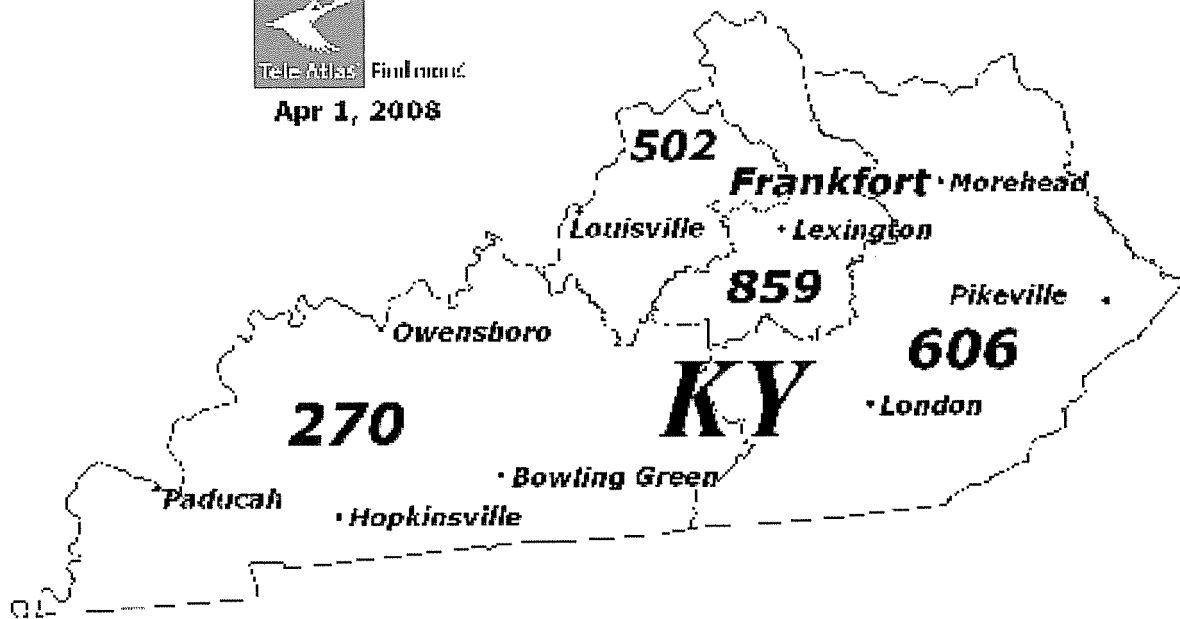
**Appendix E**  
**General Attributes of Common Relief Alternatives**

<b>Geographic Splits</b>	<b>Overlays</b>	<b>Concentrated Growth Overlay</b>
<ul style="list-style-type: none"> <li>Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Implementation is generally understood.</li> </ul>	<ul style="list-style-type: none"> <li>With an overlay there will be more than one area code in a geographic area. Where the overlay is a new concept some customer education is desirable.</li> </ul>	<ul style="list-style-type: none"> <li>Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay, and it is difficult to predict the exhaust of the area outside of the concentrated overlay area.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will not require existing customers to change their area code.</li> </ul>	<ul style="list-style-type: none"> <li>Normally, no existing customers will be required to change their telephone number.</li> </ul>
<ul style="list-style-type: none"> <li>Geographic splits permit 7-digit dialing within an area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.</li> </ul>	<ul style="list-style-type: none"> <li>A concentrated growth overlay minimizes implementation of 10 digit dialing for customers</li> </ul>
<ul style="list-style-type: none"> <li>Stationery, business cards and advertising containing a ten-digit phone number will need to be revised by customers receiving the new area code.</li> </ul>	<ul style="list-style-type: none"> <li>There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.</li> </ul>	<ul style="list-style-type: none"> <li>Customer confusion pertaining to dialing for a concentrated overlay could exist.</li> </ul>
<ul style="list-style-type: none"> <li>Future splits will reduce the geographic size of the area code.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.</li> </ul>	<ul style="list-style-type: none"> <li>In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.</li> </ul>



Find more

Apr 1, 2008

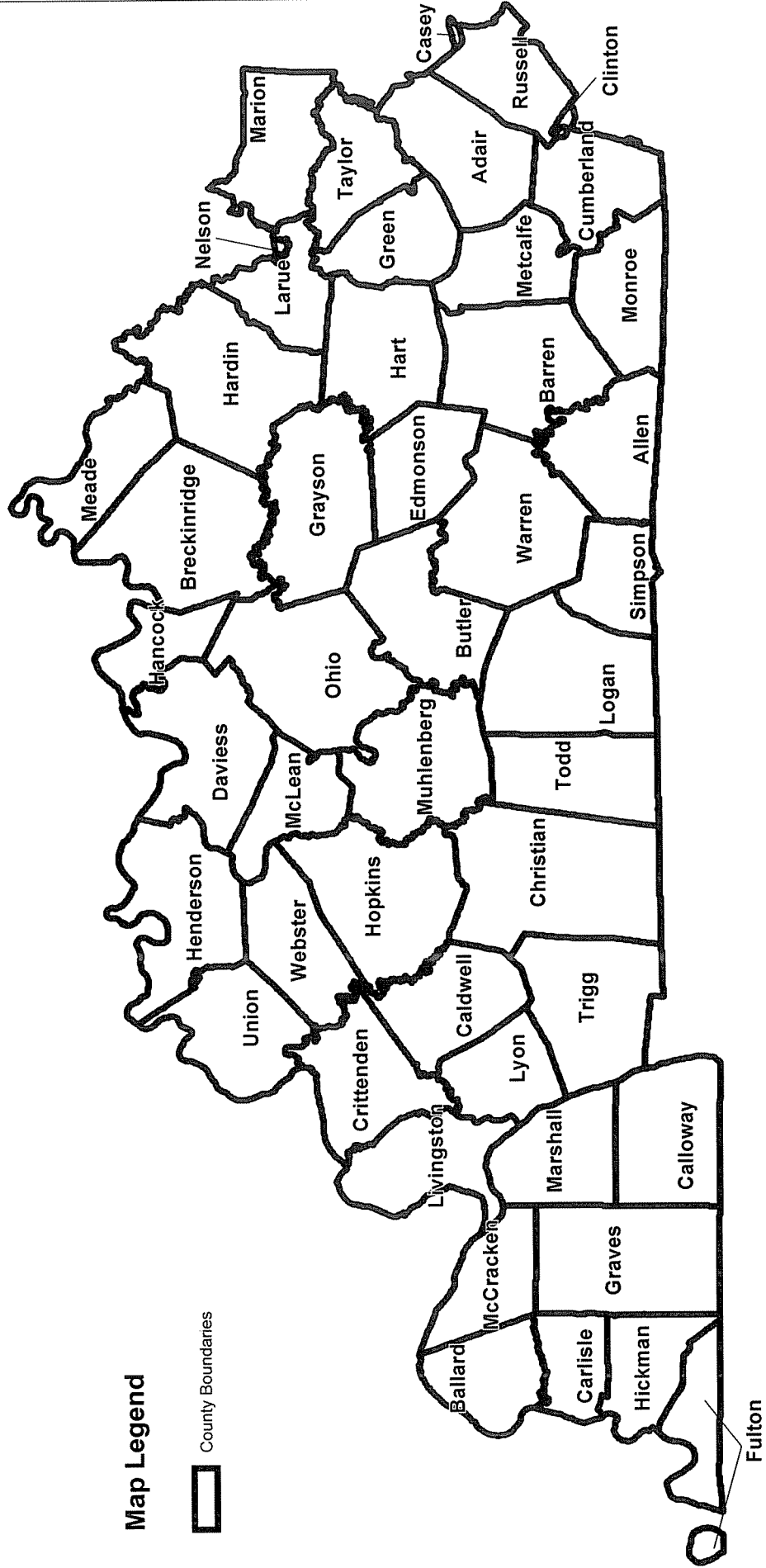


*Single Area Code*

*Overlay Area Codes*

*Area Code Split In Progress*

# NPA 270 County Map



## KENTUCKY 270 NPA

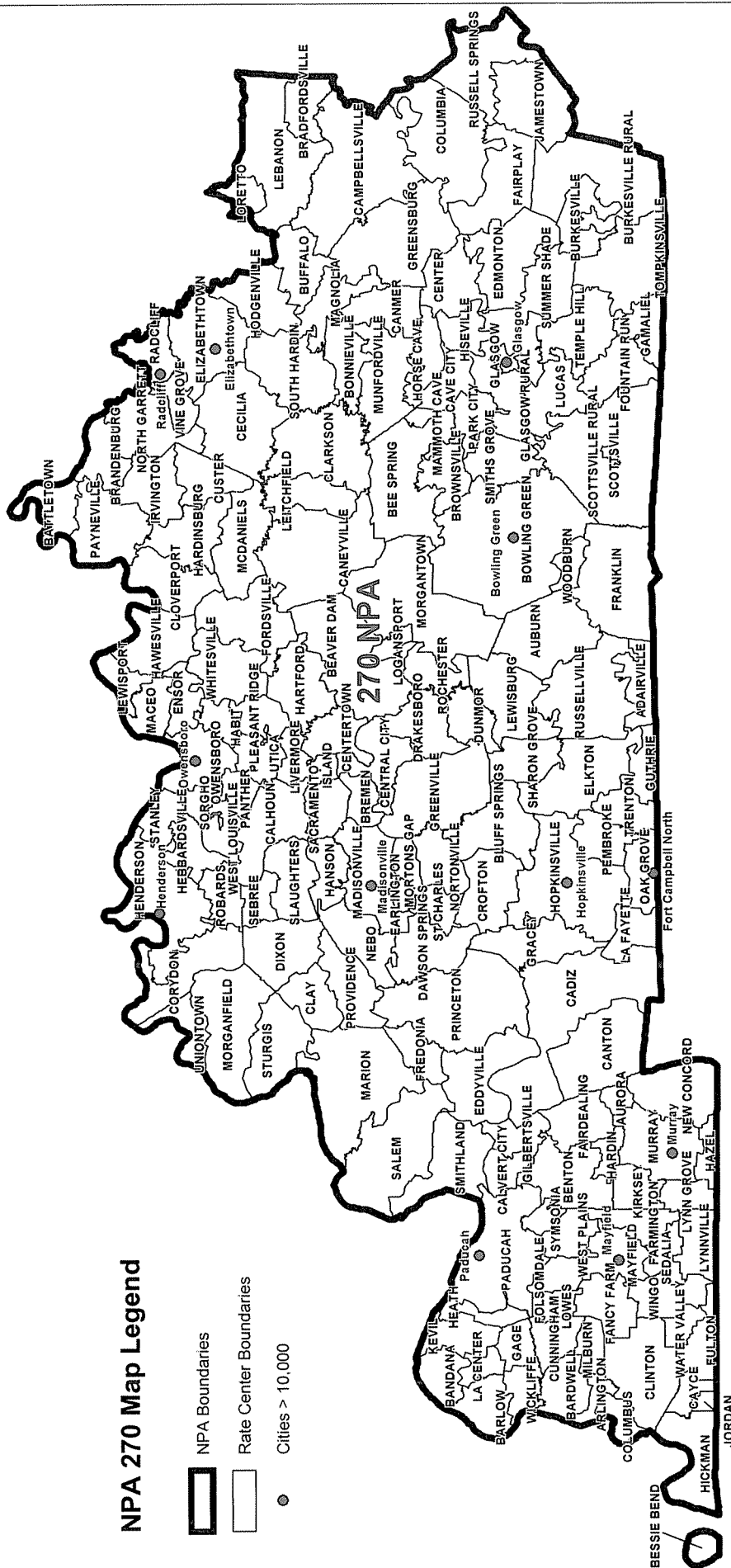
<u>COUNTY</u>	<u>POPULATION 2010</u>	<u>POPULATION, PERCENT CHANGE 2000 TO 2010</u>
ADAIR	18,656	8.2%
ALLEN	19,956	12.1%
BALLARD	8,249	-0.4%
BARREN	42,173	10.9%
BRECKINRIDGE	20,059	7.6%
BUTLER	12,690	-2.5%
CALDWELL	12,984	-0.6%
CALLOWAY	37,191	8.8%
CARLISLE	5,104	-4.6%
CASEY*	15,955	3.3%
CHRISTIAN	73,955	2.3%
CLINTON*	10,272	6.6%
CRITTENDEN	9,315	-0.7%
CUMBERLAND	6,856	-4.1%
DAVIESS	96,656	5.6%
EDMONSON	12,161	4.4%
FULTON	6,813	-12.1%
GRAVES	37,121	0.3%
GRAYSON	25,746	7.0%
GREEN	11,258	-2.3%
HANCOCK	8,565	2.1%
HARDIN	105,543	12.1%
HART	18,199	4.3%
HENDERSON	46,250	3.2%
HICKMAN	4,902	-6.8%
HOPKINS	46,920	0.9%
LARUE	14,193	6.1%
LIVINGSTON	9,519	-2.9%
LOGAN	26,835	1.0%
LYON	8,314	2.9%
MARION	19,820	8.8%
MARSHALL	31,448	4.4%
METCALFE	10,099	0.6%
MCCRACKEN	65,565	0.1%
MCLEAN	9,531	-4.1%
MEADE	28,602	8.6%
MONROE	10,963	-6.7%
MUHLENBERG	31,499	-1.1%
NELSON*	43,437	15.9%
OHIO	23,842	4.0%
RUSSELL	17,565	7.7%
SIMPSON	17,327	5.6%
TODD	12,460	4.1%
TRIGG	14,339	13.8%



TAYLOR	24,512	6.9%
UNION	15,007	-4.0%
WARREN	113,792	23.0%
WEBSTER	13,621	-3.5%
State of Kentucky	4,339,367	7.4%

\* Only a small portion of the county is in the 270 NPA

NPA 270 Rate Center Map, Cities

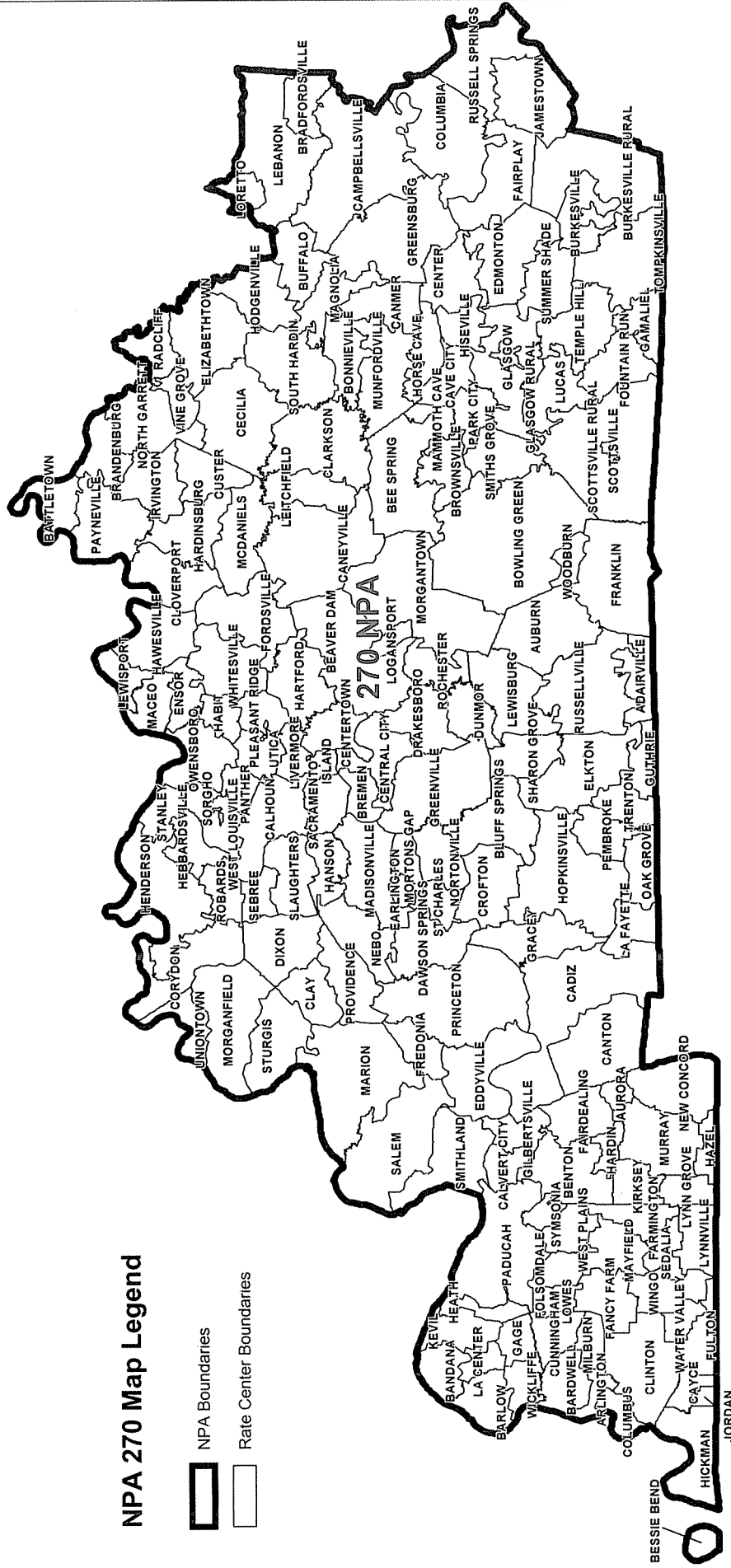


NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Cities > 10,000



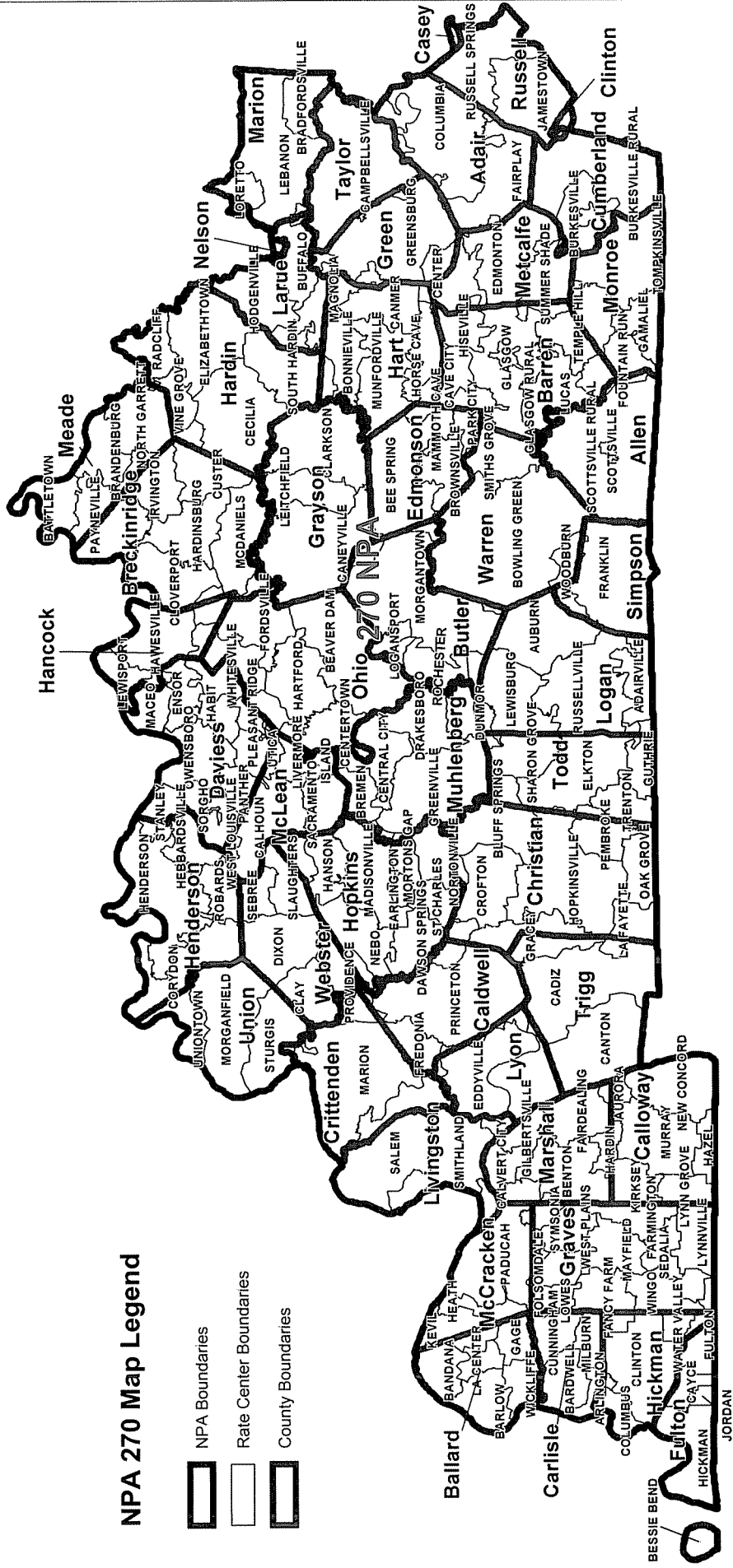
NPA 270 Rate Center Map






NPA 270 Map Legend

- Rate Center Boundaries
- NPA Boundaries

# NPA 270 Rate Center Map, County



## NPA 270 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  County Boundaries



## RATE CENTER TABLE

NPA: 270

Date: November 29, 2011

Source: NANP Administration System

Rate Center Name	Codes
ADAIRVILLE	1
ARLINGTON	2
AUBURN	1
AURORA	2
BANDANA	1
BARDWELL	4
BARLOW	2
BATTLETOWN	1
BEAVER DAM	9
BEE SPRING	1
BENTON	12
BESSIEBEND	2
BLUFF SPG	2
BONNIEVL	1
BOWLNGGREN	37
BRADFODSVL	2
BRANDENBG	2
BREMEN	1
BRKSVL RUL	2
BROWNSVL	4
BUFFALO	1
BURKESVL	5
CADIZ	7
CALHOUN	7
CALVERT CY	2
CAMPBELSVL	9
CANEYVILLE	1
CANMER	4
CANTON	2
CAVE CITY	1
CAYCE	2
CECILIA	2
CENTER	1
CENTERTOWN	2
CENTRAL CY	11
CLARKSON	3
CLAY	4

CLINTON	8
CLOVERPORT	4
COLUMBIA	8
COLUMBUS	1
CORYDON	2
CROFTON	3
CUNNINGHAM	1
CUSTER	1
DAWSON SPG	2
DIXON	3
DRAKESBORO	2
DUNMOR	1
EARLINGTON	2
EDDYVILLE	6
EDMONTON	3
ELIZABHTN	31
ELKTON	4
ENSOR	2
FAIRDEALNG	2
FAIRPLAY	3
FANCY FARM	1
FARMINGTON	1
FOLSOMDALE	1
FORDSVILLE	2
FOUNTANRUN	1
FRANKLIN	13
FREDONIA	2
FULTON	10
GAGE	1
GAMALIEL	2
GILBERTSVL	2
GLASGOW	13
GLASGOW RURAL	4
GRACEY	3
GREENSBURG	5
GREENVILLE	6
GUTHRIE	6
HABIT	1
HANSON	2
HARDIN	2
HARDINSBG	6
HARTFORD	3
HAWESVILLE	7
HAZEL	2



HEATH	1
HEBBARDSVL	1
HENDERSON	24
HICKMAN	3
HISEVILLE	2
HODGENVL	3
HOPKINSVL	22
HORSE CAVE	1
IRVINGTON	6
ISLAND	1
JAMESTOWN	1
JORDAN	2
KEVIL	2
KIRKSEY	2
LA CENTER	3
LA FAYETTE	1
LEBANON	7
LEITCHFLD	11
LEWISBRG	1
LEWISPORT	1
LIVERMORE	2
LOGANSPORT	1
LORETTO	2
LOWES	1
LUCAS	3
LYNN GROVE	2
LYNNVILLE	1
MACEO	2
MADISONVL	20
MAGNOLIA	1
MAMOTHCAVE	1
MARION	8
MAYFIELD	12
MCDANIELS	3
MILBURN	1
MORGANFLD	9
MORGANTOWN	10
MORTONSGAP	2
MUNFORDVL	2
MURRAY	18
NEBO	1
NEWCONCORD	2
NO GARRETT	2
NORTONVL	2

OAK GROVE	10
OWENSBORO	39
PADUCAH	38
PANTHER	1
PARK CITY	3
PAYNEVILLE	2
PEMBROKE	2
PLEASATRDG	1
PRINCETON	7
PROVIDENCE	3
RADCLIFF	6
ROBARDS	1
ROCHESTER	1
RUSSELLSPG	5
RUSSELLVL	14
SACRAMENTO	1
SALEM	2
SCOTTSVL	5
SCTSVL RUL	2
SEBREE	2
SEDALIA	1
SHARON GRV	2
SLAUGHTERS	2
SMITHLAND	2
SMITHS GRV	2
SO HARDIN	3
SORGHO	1
ST CHARLES	2
STANLEY	2
STURGIS	2
SUMMERSHAD	2
SYMSONIA	2
TEMPLEHILL	2
TOMPKINSVL	5
TRENTON	2
UNIONTOWN	1
UTICA	1
VINE GROVE	2
W LOUISVL	1
WATER VLY	2
WESTPLAINS	1
WHITESVL	2
WICKLIFFE	2
WINGO	1

WOODBURN  
XXXXXXXXXX

2  
2

**CODE HOLDER TABLE**

NPA: 270

Date: November 29, 2011

Source: NANP Administration System

OCN Name	OCN	Codes
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	87
CRYSTAL COMMUNICATIONS DBA MULTIPAGE, INC.	6752	1
MCC TELEPHONY OF THE SOUTH, LLC - KY	781F	4
KENTUCKY RSA 4 CELLULAR GENERAL PARTNERSHIP	3107	3
NEXTEL COMMUNICATIONS, INC.	6232	16
KENTUCKY RSA 3 CELLULAR GENERAL PARTNERSHIP	3106	11
POWERTEL KENTUCKY LICENSES, INC.	365C	9
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	9690	35
MOBILE COMMUNICATIONS SVC OF BOWLING GREEN INC	6811	1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229	2
AMERICAN MESSAGING (AM), INC.	9748	1
YMAX COMMUNICATIONS CORP. - KY	355E	1
DIALOG TELECOMMUNICATIONS, INC. - KY	292D	2
BLUEGRASS TELEPHONE COMPANY, INC. - KY	588C	5
TOUCHTONE COMMUNICATIONS, INC. DBA ALEC, INC. - KY	4211	33
AERO COMMUNICATIONS, INC - KY	3786	26
DUO COUNTY TELEPHONE COOPERATIVE, INC.	0401	7
WOOD COMMUNICATIONS DBA CELLPAGE	6814	1
BIG RIVER TELEPHONE COMPANY, LLC - KY	266B	1
CRICKET COMMUNICATIONS, INC.	6017	1
LEWISPORT TELEPHONE CO., INC.	0412	1
BRANDENBURG TELECOM LLC - KY	5672	6
WINDSTREAM NORLIGHT, INC. - KY	2466	30
E-TEL, LLC - KY	5196	1
LEVEL 3 COMMUNICATIONS, LLC - KY	4369	45
BALLARD RURAL TELEPHONE COOP. CORP., INC.	0396	7
US LEC OF TENNESSEE INC. - KY	3495	2
USA MOBILITY WIRELESS, INC.	6630	2
NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - KY	4001	2
SI WIRELESS, LLC	335G	1
NUVOX COMMUNICATIONS	8660	1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	154
INSIGHT PHONE OF KENTUCKY, LLC - KY	6062	8
ALEC, LLC - KY	7017	29

RUDDATA CORPORATION	4240	25
SBC INTERNET SERVICES, INC.	516C	3
CUMBERLAND CELL, INC. DBA DUO COUNTY TELECOM - KY	330E	1
SOUTH CENTRAL TELCOM, LLC	5620	2
HALO WIRELESS, INC	429F	1
SALEM TELEPHONE CO.	0417	1
CUMBERLAND CELLULAR PARTNERSHIP	3108	5
SPRINT SPECTRUM L.P.	6664	14
NORTH CENTRAL COMMUNICATIONS, INC. - KY	9590	1
WINDSTREAM KENTUCKY EAST, INC. - LONDON	9691	14
BIG RIVER TELEPHONE COMPANY, LLC - MO	023B	9
SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	0418	19
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	0421	15
LOGAN TELEPHONE COOPERATIVE, INC.	0413	6
VELOCITY NETWORKS OF KENTUCKY, INC.-KY	2335	1
TCG OHIO - KY	8406	1
COMCAST PHONE OF KENTUCKY, LLC - KY	364D	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KY	6500	33
BRANDENBURG TELEPHONE CO.	0398	13
HYPERCUBE TELECOM, LLC - KY	861C	1
AT&T LOCAL	7421	7
SPRINT COMMUNICATIONS COMPANY, L.P. - KY	3994	24
KNOLOGY OF KENTUCKY, INC.	3986	1

# 270 NPA - RELIEF ALTERNATIVES

## KENTUCKY

Numbering Plan Area Born on Date: April 19, 1999

### NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF Date	October 2011
Projected Exhaust Date	1Q2015
Annualized CO Code Demand Projection	12
Monthly CO Code Demand Projection	1.0
NXX Assignment Data	November 2011

### NPA RELIEF ALTERNATIVES

#### OVERLAY ALTERNATIVE

##### ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 270 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 270 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 733  
Total rate centers = 170  
Area Code Life in Years = 65

#### NPA SPLIT ALTERNATIVE

The exhausting NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

##### ALTERNATIVE #2 – NPA SPLIT

The proposed split boundary line runs north-to-south along rate center boundaries where Henderson, Slaughters, Drakesboro, Sharon Grove and Guthrie are some of the rate centers west of the boundary line and Stanley, Calhoun, Centertown, Rochester, and Russellville are among the rate centers east of the boundary line.

AREA "A"  
Total CO Codes = 376  
Total rate centers = 87  
Area Code Life in Years = 62

AREA "B"  
Total CO Codes = 357  
Total rate centers = 83  
Area Code Life in Years = 68

INDUSTRY NPA SPLIT ALTERNATIVE THAT DOES NOT MEET GUIDELINES

ALTERNATIVE #3 – NPA SPLIT

The proposed split boundary line runs north-to-south along rate center boundaries where Hebbardsville, Slaughters, Madisonville, Nortonville, Hopkinsville and Oak Grove are some of the rate centers west of the boundary line and Stanley, Calhoun, Bremen, Greenville, Elkton and Trenton are among the rate centers east of the boundary line..

AREA "A"

Total CO Codes = 409

Total rate centers = 94

Area Code Life in Years = 52

AREA "B"

Total CO Codes = 324

Total rate centers = 76

Area Code Life in Years = 82

## 270 – RELIEF ALTERNATIVES

### KENTUCKY

#### PROJECTED LIVES OF RELIEF ALTERNATIVES

#### IN YEARS

Alternative	Area A	Area B	Overlay
#1	-	-	65
#2	62	68	

#### ALTERNATIVE THAT DOES NOT MEET GUIDELINE REQUIREMENTS

#3	52	82	
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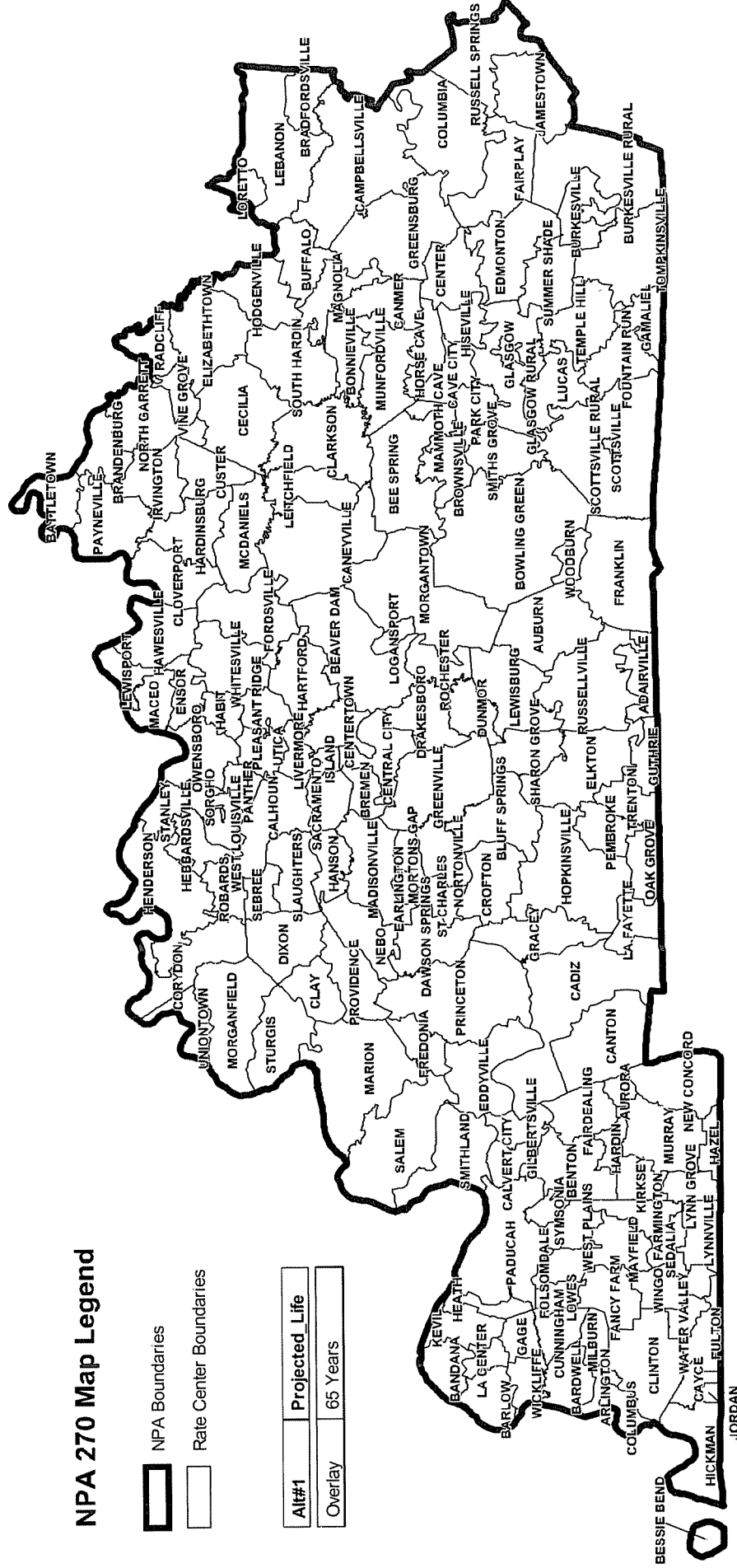
NPA 270 Rate Center Map

ALTERNATIVE #1  
ALL SERVICES OVERLAY

NPA 270 Map Legend

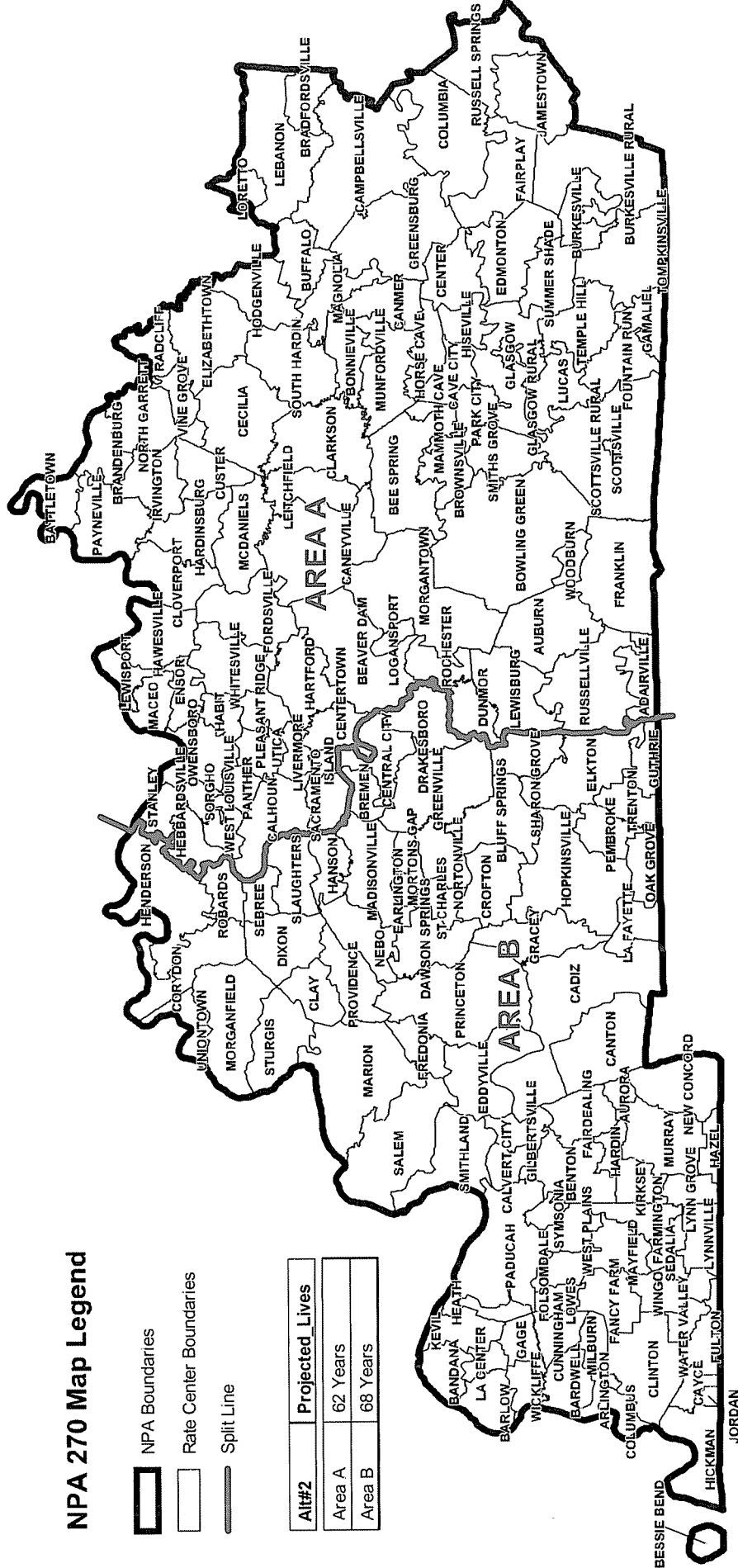
-  NPA Boundaries
-  Rate Center Boundaries

Alt#1	Projected_Life
Overlay	65 Years



### NPA 270 Rate Center Map

### ALTERNATIVE #2 GEOGRAPHIC SPLIT



### NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alt#2	Projected Lives
Area A	62 Years
Area B	68 Years



# ALTERNATIVE #3 GEOGRAPHIC SPLIT



NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alt#3	Projected Lives
Area A	52 Years
Area B	82 Years

## ALTERNATIVE #3 GEOGRAPHIC SPLIT

### Map Legend

County Boundaries

Split Line

Alt#3	Projected_Lives
Area A	52 Years
Area B	82 Years

