

ORIGINAL

July 18, 2006

By Overnight Courier

Mr. Michael Burford, Secretary
Kentucky Public Service Commission
211 Sower Boulevard
PO Box 615
Frankfort, Kentucky 40602

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COMMISSION

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PUBLIC SERVICE
COMMISSION

Re: Case No. ~~388~~ Relief Plan for the 270 NPA

Dear Mr. Burford:

Case No. 2006-00357

NeuStar, Inc., as the North American Numbering Plan Administrator, submits for filing an original and ten copies of the enclosed Amendment And Erratum To Application Of The North American Numbering Plan Administrator On Behalf Of The Kentucky Telecommunications Industry. Please date-stamp the enclosed return copy as received and return it in the attached 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
NeuStar, Inc.
North American Numbering Plan
Administrator

Enclosures

ORIGINAL

**Before the
PUBLIC SERVICE COMMISSION
Commonwealth of Kentucky**

RECEIVED

JUL 19 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF NANPA,
ON BEHALF OF THE KENTUCKY
TELECOMMUNICATIONS INDUSTRY,
FOR APPROVAL OF NPA RELIEF PLAN
FOR THE 270 NPA

CASE NO. ~~388~~ 2006-00357

**AMENDMENT AND ERRATUM TO
APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN
ADMINISTRATOR ON BEHALF OF THE KENTUCKY
TELECOMMUNICATIONS INDUSTRY**

Pursuant to a request of the staff of the Kentucky Public Service Commission (“Commission”) regarding the above-referenced case, NeuStar, Inc., as petitioner and in its role as the North American Numbering Plan Administrator (“NANPA”), submits this Amendment and Erratum to provide an update on the projected exhaust of the 270 numbering plan area (“NPA”) and update the record with the newly calculated lives of the relief alternatives originally set forth in NeuStar’s petition¹ in this proceeding.

On April 30, 2006, NANPA released the *2006 NRUF [Number Resource Utilization Forecast] and NPA Exhaust Analysis* (“2006 NRUF Exhaust Report”) providing projected exhaust dates for all United States NPAs based upon recent CO code demand forecasts and utilization information provided by service providers.² The

¹ The Application of NANPA, On Behalf of the Kentucky Telecommunications Industry, For Approval of NPA Relief Plan for the 270 NPA, Case No. 388 (filed July 25, 2001). A copy of NeuStar’s Original Petition is attached.

² The 2006 NRUF Exhaust Report can be accessed at <http://www.nanpa.com> under the “Reports” link.

projected exhaust date for the 270 NPA is the first quarter of 2009. In its original 2001 petition, NANPA forecasted the exhaust to be the second quarter of 2003. However, since that filing, the Commission responded with a numbering conservation order,³ thousands block number pooling was implemented in 2003 and other optimization measures were adopted by the Federal Communications Commission and the Industry. Those optimization measures combined with reduced historical and projected demand for numbering resources by Industry members contributed to extending the projected exhaust date. However, the current exhaust projection of first quarter 2009 is less than 36 months, the time in which NANPA is required to begin NPA relief planning. Therefore, following discussions with Commission staff, NANPA brings this new set of facts to the attention of the Commission by refiling the original petition along with the instant Amendment to update the projected lives of the relief alternatives proposed within the original petition.

The following table sets forth the projected lives of the alternatives as originally calculated in NANPA's petition, and as recalculated utilizing demand projection data provided by service providers for the 2006 NRUF Exhaust Report.

³ Order, The Application of NANPA on Behalf of the Kentucky Telecommunications Industry for Approval of NPA Relief Plan for the 270 NPA, and Number Conservation Measures within Kentucky, Administrative Case No. 388 (Sept. 26, 2001).

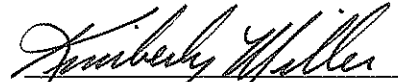
No.	Type of Relief	Originally Projected Lives	Updated Projected Lives (July 2006)
Alt. #1	Geographic Split	Area A: 11 years Area B: 8 years	Area A: 20 years Area B: 15 years
Alt. #2	Geographic Split	Area A: 9 years Area B: 10 years	Area A: 14 years Area B: 21 years
Alt. #3	Geographic Split	Area A: 9 years Area B: 10 years	Area A: 20 years Area B: 15 years
Alt. #4	Geographic Split	Area A: 9 years Area B: 10 years	Area A: 16 years Area B: 19 years
Alt. #4A	Geographic Split	Area A: 8 years Area B: 12 years	Area A: 13 years Area B: 23 years
Alt. #5	All Services Overlay	9 years	17 years

As the table demonstrates, the projected lives of each relief alternative have been extended as compared to projected lives originally set forth in NANPA's petition.

NANPA takes this opportunity to correct typographical errors in the original petition. On page four of the petition, in the paragraph describing relief Alternative #4A, the first occurrence of "Area B" should be changed to "Area A." On page six of the petition, in the paragraph describing relief Alternative #4A, "Alternative #5" should be changed to "Alternative #4A". Finally, in Attachment 2 to Exhibit A, the area on the maps for the Glasgow rate center currently consists of the Glasgow and the Glasgow Rural rate centers.

In the interest of updating the record, NANPA submits the foregoing Amendment and Erratum. As a neutral third party administrator, NANPA has no independent view as to the relief plan ultimately adopted by the Commission.

Respectfully submitted,



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July 18, 2006

**ORIGINAL PETITION
DATED JULY 24 2001**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
Frankfort, Kentucky 40602

In the Matter of:

THE APPLICATION OF NANPA,)
ON BEHALF OF THE KENTUCKY)
TELECOMMUNICATIONS INDUSTRY,)
FOR APPROVAL OF NPA RELIEF PLAN)
FOR THE 270 NPA)

CASE NO. 2006-00357

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"),¹ petitions the Kentucky Public Service Commission ("Commission")² to approve the Industry's consensus decision to recommend to the Commission an all-services distributed overlay as its first choice for relief of the 270 numbering plan area ("NPA").³ The Industry reached consensus

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

² The Federal Communications Commission ("FCC") delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19 (1999).

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

to recommend a north to south geographic split as its second choice for relief.⁴ The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 270 NPA will exhaust during the second quarter of 2003.⁵ In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 270 NPA, and if the Commission adopts the Industry's overlay relief plan, the Industry recommends that the Commission approve its recommended nineteen month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

1. The 2000 COCUS projections for CO code utilization indicated that the 270 NPA would exhaust during the second quarter of 2004.⁶ Based upon that projected exhaust date, NANPA notified the Commission and the Industry on February 2, 2001 that NPA relief needed to be addressed. The Industry met on April 2, 2001, in Lexington, Kentucky, to discuss various relief alternatives.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) ("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 web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

⁵ 2001 NRUF and NPA Exhaust Analysis June 1, 2001 Update ("2001 NRUF Report"). The 2001 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>. The Industry originally met to decide upon a relief plan on April 2, 2001 based upon a second quarter 2004 exhaust projection as set forth in the 2000 COCUS and NPA Exhaust Analysis (May 23, 2000) ("2000 COCUS"). After the release of the 2001 NRUF, which indicated that the 270 exhaust projection had been advanced by one year, the Industry met again on July 11 to review the selected relief plans in light of the new exhaust projection.

⁶ 2000 COCUS.

⁷ A copy of the April 2 meeting minutes, including a list of attendees, is attached as Exhibit A.

Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.⁸ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of four different geographic split alternatives and one all-services distributed overlay relief alternative. Four of the alternatives were developed by NANPA and one geographic split alternative was developed by an Industry member and submitted to NANPA prior to the distribution of the IPD. During the meeting, the industry participants modified one of the geographic split alternatives and referred to it as Alternative #4A.

2. More specifically, the Industry participants considered the following alternatives:

- Alternative #1 – Geographic Split: The split boundary line runs along rate center boundaries in a northeastern/southwestern direction. The Bowling Green, Columbia and Canton rate centers are on the southern or “A” side. The rate centers of Salem, New Concord and Campbellsville are located on the northwestern or “B” side. Area A would have a projected NPA life of 11 years to exhaust and Area B would have a projected NPA life of 8 years to exhaust.
- Alternative #2 – Geographic Split: The split boundary line runs along rate center boundaries in a northern to southern direction. The Bowling Green, Greenville, Lewisport and Cadiz rate centers are on the eastern or “A” side. The rate centers of Salem, New Concord and Maceo are located on the western or “B” side. Area A would have a projected NPA life of 9 years to exhaust and Area B would have a projected NPA life of 10 years to exhaust.
- Alternative #3 – Geographic Split: The split boundary line runs along rate center boundaries in a northwestern/southeastern direction. The Bowling Green, Henderson and Scottsville rate centers are on the northeastern or “A” side. The rate centers of Salem, Uniontown and

⁸ A copy of the IPD is attached as Attachment 2 to Exhibit A.

Franklin are located on the southwestern or "B" side. Area A would have a projected NPA life of 9 years to exhaust and Area B would have a projected NPA life of 10 years to exhaust.

- **Alternative #4 – Geographic Split:** The split boundary line runs along rate center boundaries in a north to south direction, geographically dividing the 270 NPA approximately in half. The Bowling Green, Stanley and Adairville rate centers are on the eastern or "A" side. The rate centers of Salem, Henderson and Guthrie are located on the western or "B" side. Area A would have a projected NPA life of 9 years to exhaust and Area B would have a projected NPA life of 10 years to exhaust.
- **Alternative #4A – Geographic Split:** Alternative #4A is a modified version of Alternative #4. The rate centers of Bemen, Central City, Drakesboro, Elkton, Greenville, Guthrie, Sharon Grove and Trenton were moved to Area B and the Hebbardsville rate center was moved to Area B. Area A would have a projected NPA life of 8 years to exhaust and Area B would have a projected NPA life of 12 years to exhaust.
- **Alternative #5 – All Services Distributed Overlay:** A new NPA code would be assigned to the same geographic area as the existing 336 NPA. Alternative #5 has a projected life of 9 years.

3. At the April 2 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #5, the all-services distributed overlay plan, as their first choice for relief for the 270 NPA.⁹ As their second choice, the Industry participants recommended Alternative #4A, a geographic split. The Industry eliminated Alternatives #1 - #4 because the dividing boundaries split communities or

⁹ See Attachment #2 to Exhibit A for a list of Industry agreed upon attributes of geographic splits and overlays.

interests and EAS routes and created the need to duplicate additional CO codes to preserve seven-digit dialing to wireless customers.¹⁰ Although the Industry noted that Alternative #4A also would create the need to duplicate more CO codes, it did not divide as many communities of interest or EAS routes as the other geographic split alternatives.

4. On July 11, 2001, the Industry met again to discuss the selected relief plans in light of the recent release of the 2001 NRUF Report which projects that the 270 NPA will exhaust by the second quarter of 2003, one year earlier than the exhaust projection set forth in the 2000 COCUS.¹¹ The 2001 NRUF Report incorporates recent projections and usage data reported to NANPA by the Industry and replaces the 2000 COCUS. During the July 11 meeting, the Industry ratified its earlier choices.

II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

5. Alternative #5, the all-services distributed overlay, 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. In agreement with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 270 NPA and the new overlay NPA.¹² Industry members recommend that 1 + 10-digit permissive dialing be permitted for such calls. All toll calls, whether the calls are to the home NPA or a foreign NPA, will be dialed using 1 + 10 digits. When the 270 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #5 is 9 years.

¹⁰ See Exhibit A for the list of Industry agreed upon reasons for eliminating Alternatives #1 - #4.

¹¹ A copy of the July 11, 2001 NPA relief planning meeting minutes is attached as Exhibit B.

¹² 47 C.F.R. §52.19(c)(3)(ii).

6. Alternative #4A, a geographic split, would split the 270 NPA into two NPAs with the dividing boundary separating the 270 NPA into an eastern and western half beginning between the Stanley and Henderson rate centers and extending to the Oak Grove and Trenton rate centers. A geographic split requires customers located within the area receiving the new area code to change their telephone numbers. Customers will continue using seven-digit local dialing. Local calls placed between the two area codes would require ten-digit dialing. The projected lives of the two NPAs created by Alternative #5 are 8 and 12 years.

7. Industry participants reached consensus to recommend to the Commission a 19-month schedule for NPA relief implementation. The schedule, provided below, includes recommended implementation intervals for each implementation phase. The intervals are dependent upon the Commission's adoption of an all-services overlay as the means of relief for the 270 NPA.

RECOMMENDED RELIEF IMPLEMENTATION INTERVALS

EVENT	TIME FRAMES
Network Preparation Period	12 Months
Permissive 10-Digit Dialing Period and Customer Education Period (Calls within 270 NPA can be dialed using either 7 or 10 digits) Mandatory 10-Digit Dialing Begins at end of Permissive Period	6 Months
First Code Activation in New NPA	1 Month after Mandatory Dialing Period Begins

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

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 270 NPA in Kentucky to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's first choice for relief for the 270 NPA, an all-services distributed overlay, or the Industry's second choice, a geographic split. The Industry also requests that the order approve the Industry recommended nineteen month schedule for the implementation of the ordered relief plan.

Respectfully submitted,


Kimberly D. Wheeler

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July 24, 2001

EXHIBIT A

**270 NPA - KENTUCKY
INITIAL RELIEF PLANNING MEETING
LEXINGTON, KENTUCKY
APRIL 2, 2001**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Mr. Frank Colaco, NeuStar NANPA Senior NPA Relief Planner opened the meeting with introductions, a review of the agenda and the objectives of the meeting. A list of attendees can be found in Attachment 1.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. He also reviewed Section 5.0 (a-h) of the NPA Code Relief Planning and Notification Guidelines. This document, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: (www.atis.org/atis/clc/inc/incdocs.htm).

STATUS OF KENTUCKY 270 NPA

Mr. Colaco reviewed the current status of the 270 NPA, which reflects a total of 506 assigned NXX codes. As of March 27, 2001, 208 NXX codes remain available for assignment in the 270 NPA, while 86 NXX codes are classified as unavailable. Of the 86 unavailable codes, 63 NXX codes are protected for land-to-mobile 7-digit dialing. The 2000 Central Office Code Utilization Survey ("COCUS") projected exhaust of the 270 NPA is 2nd Quarter 2004.

Mr. Colaco advised the participants that NANPA recently initiated a nationwide effort to recover as many "unassignable" NXXs as possible. All former Code Administrators received a copy of NANPA's database notes and have been requested to review the status of each NXX code and determine whether any could be reclassified as "available".

Statement for the record (Kentucky Public Service Commission): "If the Industry cannot support the continued use of 63 NXXs for 7-digit protected dialing, the Industry should ask the Commission to review their ruling in light of the pending NPA exhaust."

The Initial Planning Document (IPD) was developed with data that was current as of the February, 2001 LERG. Mr. Colaco referenced the March, 2001 LERG, and indicated that the monthly average demand of 7 NXXs codes per month has decreased to 6 NXXs per month.

Since April 2000, the monthly NXX code assignments in the 270 NPA were as follows:

APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	AVG
5	4	9	33	1	2	5	2	8	2	2	3	6.3

Based on the latest assignment information, with a 12-month average of 6 NXX code assignments per month, the 270 NPA will exhaust in 34 months. Assuming a six-month average assignment rate of 4 NXX code assignments per month, the 270 NPA will exhaust in 52 months.

STATUS OF KENTUCKY 502 NPA

At the request of an industry participant, Mr. Colaco also reviewed the status of the Kentucky 502 NPA. The 2000 COCUS projected the exhaust of the 502 NPA to occur during 1st Quarter 2003. However, as of March 27th, that projection has been revised to the 4th Quarter, 2005. There are 414 NXX codes presently assigned; 70 codes are unavailable for assignment and 316 NXX codes remain available for assignment. 67 NXX codes were assigned between March 2000 and February 2001. The twelve-month average assignment rate is 6 codes per month, while the six-month average is 3 codes per month. Assuming a growth rate of 6 codes per month, the 502 NPA will exhaust in 52 months. At an average assignment rate of 3 codes per month, the 502 NPA would exhaust in 105 months. A new Numbering Resource Utilization Forecast ("NRUF") will be available in May, 2001, which may further impact the projected exhaust of the 502 NPA.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 270 NPA

Mr. Colaco reviewed the Initial Planning Document (IPD) distributed prior to the meeting, which included four (4) geographic split alternatives (Alternative #1 through Alternative #4), and one all services distributed overlay alternative (Alternative #5). The overlay plan, as well as three of the split alternatives, were developed by NANPA. BellSouth contributed Split Alternative #4 during a pre-IPD conference call that was held on February 20, 2001.

DISCUSSION OF RELIEF ALTERNATIVES

General discussion ensued regarding the attributes of geographic splits and overlay alternatives. After discussion, a proposal was made, and consensus was reached to eliminate Alternative #1 for the following reasons:

- Provides least relief for the "B" side.
- Splits Service Provider service area (Magnolia vs Buffalo).
- Splits LaRue County (Magnolia, Buffalo and Hodgenville).
- Splits communities of interest.
- Would require additional protected NXX codes to preserve 7-digit dialing.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative #3 for the following reasons:

- Splits Service Provider territories' EAS route and communities of interest.
- Exacerbates 7-digit inter-NPA requirements.

After discussion, a proposal was made, and consensus was reached to modify Alternative #4 and rename it Alternative # 4A:

- Move the following rate center from Area A to Area B: Hebbardsville.

- Move the following rate centers from Area B to Area A: Bremen, Central City, Drakesboro, Elkton, Greenville, Guthrie, Sharon Grove and Trenton.
- This resulted in the following projected lives:
 - Area "A" – 8 years
 - Area "B" – 12 years

After discussion, a proposal was made, and consensus was reached to eliminate Alternative #2 for the following reasons:

- Splits EAS routes
- Exacerbates 7-digit inter-NPA dialing
- Creation of Alternative #4A makes Alternative #2 less desirable due to impact to communities of interest.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative #4 for the following reasons:

- Splits county boundaries.
- Exacerbates 7-digit inter-NPA dialing.

REACH CONSENSUS ON RELIEF ALTERNATIVE

Consensus was reached to recommend Alternative #5 – an All Services Overlay, to the Kentucky Public Service Commission as the industry's first choice alternative for relief of the 270 NPA, while Split Alternative #4A will be recommended as a second choice alternative. A concern was raised that the rate of NXX code assignments in the 270 NPA appears to have slowed over the past six months. It was suggested that it may be prudent to wait until after the release of the impending 2001 NRUF data to determine if there is a change to the forecasted exhaust of the 270 NPA before NANPA files the industry's relief plan with the Kentucky PSC. Consensus was reached to convene a conference call on July 11, 2001 to review the status of the 270 NPA (after the release of the 2001 NRUF data) to determine a date that NANPA will file the industry's relief plan with the Kentucky Commission.

Consensus was reached that during the July 11 conference call, the industry will have the opportunity to revisit the two recommended relief alternatives (Alternatives #5 and #4A) one last time for the sole purpose of determining if there is a need to reverse the priority of the first and second choice alternative. Absent any change by the industry during that call, NANPA's filing to the Kentucky Commission will reflect the original industry consensus to recommend Alternative #5 (All Service Overlay) as the first choice alternative, and Alternative #4A (NPA Split) as the second choice alternative. Any changes to previous consensus agreements will be made in accordance with established consensus procedures.

REACH CONSENSUS ON DIALING PLAN

A proposal was made, and consensus was reached to adopt the following mandatory 10-digit dialing plan throughout the NPA, consistent with FCC mandate:

- All Home NPA (HNPA) local calls are dialed on a 10-digit basis, i.e., NPA-NXX-XXXX (10-digits).

- All Home NPA (HNPA) toll calls, i.e., are dialed with a prefix "1" and 10 digits, i.e., 1+HNPA+NXX+XXXX.
- All foreign NPA (FNPA) local calls are dialed on a 10-digit basis with no prefix, i.e., FNPA-NXX-XXXX (10-digits).
- All FNPA toll calls are dialed with a prefix "1" and 10 digits, i.e., 1 + FNPA-NXX-XXXX (1 + 10 digits).
- All Operator Assisted calls are dialed with a prefix "0" and 10 digits, i.e., 0+NPA+NXX+XXXX.

ESTABLISH IMPLEMENTATION SCHEDULE

A proposal was made, and consensus was reached to recommend the following 19-month schedule for implementation of the overlay relief plan for the 270 NPA:

EVENT	TIMEFRAME
Total Interval	19 months
Network Preparation	12 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Local Calls within 270 NPA can be dialed using 7 or 10 digits)</i>	6 months
First Code Activation <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory)

SET DATE FOR REVIEW OF DRAFT MEETING MINUTES & DRAFT COMMISSION FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed along with a draft commission filing to the industry on or before April 20, 2001. Consensus was also reached to conduct a conference call to review and approve these minutes as well as the draft filing to the Kentucky Commission. Details of the call are as follows:

Conference Date: Monday, May 7, 2001
 Conference time: 11:00 A.M., Eastern Daylight Time
 Dial-in number: 847-619-6648
 Pass code number: 6470689#

SET DATE FOR CONFERENCE CALL TO DETERMINE FILING DATE AND REVIEW CONSENSUS

Details of the call are as follows:
 Conference Date: Wednesday, July 11, 2001
 Conference time: 11:00 A.M., Eastern Daylight Time
 Dial-in number: 847-619-6648
 Pass code number: 6479689#

ATTACHMENT 1 TO EXHIBIT A

**270 NPA - KENTUCKY
INITIAL RELIEF PLANNING MEETING
LEXINGTON, KENTUCKY
APRIL 2, 2001**

ATTENDEES

NAME	COMPANY
Wes Baker	Arch Wireless
Warren Olson	Arch Wireless
Matt Skoglund	Arch Wireless
Douglas McCullough	BellSouth
Bill Mitchell	BellSouth
Deborah Strickler	BellSouth
Jim Tipton	BellSouth
Clint Quenzer	Bluegrass Cellular
Randall Bradley	Brandenburg Telephone
Robert Fegenbush	Brandenburg Telephone
Ron Storie	Cingular Wireless
Mark Henry	Duo County Telephone
J. Wayne Bates	Kentucky Public Service Commission
Forest Skaggs	Kentucky Telephone Association
Greg Hale	Logan Telephone Cop., Inc.
Frank Colaco	NANPA
Clare Larca	NANPA
George Light	NANPA
Robert Dale	South Central Rural Telephone Co-op
Daryl Wyatt	South Central Rural Telephone Co-op
Larry Callison	Verizon
Joanne Edelman	Verizon Wireless
Craig Sullivan	West Kentucky Rural Telephone Co-op

ATTACHMENT 2 TO EXHIBIT A



March 4, 2001

To: 270 NPA Code Holders & Other Industry Members

Re: Industry Meeting to Plan Relief for the Kentucky 270 Area Code

On February 5, 2001, NeuStar, Inc. North American Numbering Plan Administration (NANPA) informed the *Kentucky telecommunications industry* of the need for NPA relief planning and announced that an industry meeting would be held on April 2, 2001 to develop a relief plan for the 270 area code.

In accordance with industry guidelines, enclosed is the Initial Planning Document (IPD) for consideration and discussion by the industry at the April 2 meeting. Five (5) NPA relief alternatives have been prepared for the 270 NPA, four of which were prepared by NANPA and a fifth contributed by BellSouth Telecommunications. The five alternatives are comprised of four geographic splits and one all-services distributed overlay. If you wish to present additional alternatives for the industry to consider, please be prepared to present them during the meeting on April 2. Included with the IPD alternatives and maps, for your information are the following attachments: Meeting Agenda, Advance Meeting Registration Form, Industry Consensus Process definition, General Attributes of Splits and Overlays, and a list of Total NXX Code Assignments by Rate Center from the 270 NPA Planning Model.

An informal pre-IPD conference call was held on February 20, 2001, to assist NANPA in the development of the relief alternatives for the IPD. During that meeting, BellSouth Telecommunications presented a split alternative that they had developed, which is among those contained in this distribution, and is labeled as "Alternative #4".

As a reminder, the NPA relief planning meeting will be held on Monday, April 2, 2001 at the **Marriott Griffin Gate Resort, 1800 Newtown Pike, Lexington, Kentucky, at 10:00 a.m. local time.** Registration will begin at 9:30 AM. An agenda and Advance Meeting Reservation Form is attached. If you plan to attend this meeting, please complete and return the attached Advance Meeting Reservation Form to Stacey Whitlock of NANPA Administration by March 26, 2001 so we can effectively make plans to accommodate everyone who wishes to attend.

NEUSTAR, INC.
1120 Vermont Avenue, N.W.
Suite 400
Washington, DC 20005
Phone 202 533 2600
Fax 202 533 2975

You may also contact Stacey by phone at (202) 533-2656 or by email at stacey.whitlock@neustar.com to place your reservation.

Experience demonstrates that this could be the only face-to-face meeting of the industry before a decision is reached on a recommended NPA relief plan, therefore NANPA strongly encourages your participation in this meeting.

The cost of the meeting facilities at the Marriott Griffin Gate will be divided among the industry participants and is expected to be approximately \$35-\$45 per attendee. The expected cost to each participant is only an estimate and an invoice for the exact charge will be rendered shortly after the meeting.

If you have any questions or concerns that you would like to discuss before the meeting, please call me at (708) 848-3838 or contact me by email at george.light@nanpa.com. You may also contact Frank Colaco, Sr. NPA Relief Planner, at (973) 740-9100 or by email at frank.colaco@neustar.com.



George Light
NPA Relief Planner
Central Region - NANPA

Enclosures

**KENTUCKY - 270 NPA RELIEF PLANNING
INDUSTRY MEETING
MONDAY, APRIL 2, 2001**

**Marriott's Griffin Gate Resort
1800 Newtown Pike
Lexington, Kentucky
Telephone: (859) 231-5100**

AGENDA

- 9:30 Registration
- 10:00 Welcome and Introductions
- 10:10 Minutes and "Statements For The Record"
- 10:20 Industry Guidelines
- 10:30 Review Code Assignment History
- 10:40 Review Initial Planning Documents
- 12:00 Lunch (On Your Own)
- 1:00 Review Initial Planning Documents
- 1:30 Additional Alternatives from Industry
- 2:00 Elimination of Alternatives
- 2:30 Consensus on Relief Alternative(s)
- 3:00 Consensus On Dialing Plan(s)
- 3:30 Consensus on Implementation Intervals
- 4:00 Consensus on NANPA Filing Industry Efforts With Commission
- 4:15 Statements for the Record
- 4:30 Set Date for Conference Call to Approve Minutes
- 4:45 Complete NANPA Survey
- 5:00 Adjourn

ADVANCE MEETING RESERVATION FORM

**KENTUCKY
270 NPA RELIEF PLANNING
INDUSTRY MEETING
MONDAY, APRIL 2, 2001**

**MARRIOTT'S GRIFFIN GATE RESORT
1800 Newtown Pike
Lexington, Kentucky
Telephone: (859) 231-5100**

Hosted by: NANPA

Name: _____

Address: _____

Company: _____

Telephone Number: _____

FAX: _____

E-mail: _____

RETURN COMPLETED FORM BY MARCH 26, 2001 TO:

**Stacey Whitlock
FAX: (202) 887-0331
Telephone (202) 533-2656**

CONSENSUS PROCESS

Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those groups materially and differently affected by the outcome or result of the issue or question being called. Substantial agreement means more than a simple majority, but not necessarily unanimity. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection.

The consensus process is to be free from interest group dominance, requiring that all views and objections be considered. This requires that a concerted effort be made toward issue resolution. Input from all participants will be considered carefully and in good faith when reaching consensus recommendations and resolutions.

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.

Therefore, the key factor in determining whether consensus is reached should be the rationale for how a question or issue directly and materially affects any given participant.

**CLC Principles and Procedures, Section 6.7.8 (December 2000)
(Incorporates Closure on CLC Issue 22)**

NPA Relief Alternative Attributes

Splits

Overlays

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Future splits will reduce the geographic size of the area code.
- Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.
- Geographic splits permit 7-digit local dialing within the smaller home NPA. However local dialing across the NPA boundary should become 10 digit.

General Attributes of Overlays

- With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
 - An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
 - An overlay will require customers to dial 10 Digits or 1 + 10 digits for all calls within the geographic area.
-
-

Initial Planning Document
For Relief of the KENTUCKY 270 NPA

Prepared by:

George Light
NPA Relief Planner
Central Region – NANPA

Clare Larca
NPA Relief Planner
Central Region - NANPA

North American Numbering Plan Administration

Frank Colaco, Senior NPA Relief Planner - NANPA
James N. Deak, Regional Director, NPA Relief Planning – NANPA
Ronald R. Conners, Director - NANPA

March 2, 2001

Kentucky 270 NPA Relief Alternatives

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR KENTUCKY 270

COCUS DATE:	May 2000
PROJECTED EXHAUST DATE:	2 nd Quarter 2004
COCUS ANNUAL CODE GROWTH:	83
AVERAGE MONTHLY NXX GROWTH:	7.0
LERG DATA :	February, 2001

Geographic Split Alternatives

All split plans maintain seven-digit local dialing within an NPA, where applicable. Local calling scopes are not affected. Dialing of the area code is required for local dialing between NPAs in the same local calling area. One area will keep the 270 NPA and one area will receive a new NPA. Projected lives of the alternatives are not affected by which side keeps the 270 NPA.

Alternative #1 – Two-Way Geographic Split

A two-way geographic split, with an East-West split line, creating an NPA to the north and one to the south. Area "A", the southern portion is bordered by the western side of Kentucky Lake to the west and NPA 606 to the east. Area "B" is comprised of the extreme western section of Kentucky and is bordered to the east by NPAs 502 and 859. Contained within area "B" are all portions of the existing 270 NPA residing within the Eastern Time zone. Projected lives are not affected by which area retains the 270 NPA.

Area A	235 NXX Codes	74 Rate Centers	Projected Life: 11 years
	Bowling Green, Glasgow, Hopkinsville, Madisonville, Russellville		
Area B	268 NXX Codes	93 Rate Centers	Projected Life: 8 years
	Elizabethtown, Hendersonville, Murray, Owensboro, Paducah		

Alternative #2 – Two-Way Geographic Split

A two-way geographic split, with a diagonal Northeast-Southwest split line, creating an NPA to the east and an NPA to the west. Area "A", the eastern portion is bordered by NPAs 502, 606 and 859 to the east, and the western portion of Kentucky to the west. Area "B" comprises the extreme western portion of the NPA as well as the southern borders of Illinois and Indiana. Projected lives are not affected by which area retains the 270 NPA.

Area A	265 NXX Codes	85 Rate Centers	Projected Life: 9 years
	Bowling Green, Elizabethtown, Glasgow, Hopkinsville, Russellville		
Area B	238 NXX Codes	82 Rate Centers	Projected Life: 10 years
	Henderson, Madisonville, Murray, Owensboro, Paducah		

Alternative #3 – Two-Way Geographic Split

A two-way geographic split, with a diagonal Northwest-Southeast split line, with the city of Henderson at the northwest border and the city of Franklin at the southeast border. Projected lives are not affected by which area retains the 270 NPA.

Area A	265 NXX Codes	85 Rate Centers	Projected Life: 9 years
	Bowling Green, Elizabethtown, Glasgow, Henderson, Owensboro		
Area B	238 NXX Codes	82 Rate Centers	Projected Life: 10 years
	Hopkinsville, Madisonville, Murray, Paducah, Russellville		

Alternative #4 – Two-Way Geographic Split

A two-way geographic split, with a North-South split line, with the city of Owensboro at the northern end of the split, and the city of Adairville to the south. Projected lives are not affected by which area retains the 270 NPA.

Area A	256 NXX Codes	83 Rate Centers	Projected Life: 9 years
	Bowling Green, Elizabethtown, Glasgow, Henderson, Owensboro		
Area B	247 NXX Codes	84 Rate Centers	Projected Life: 10 years
	Hopkinsville, Madisonville, Murray, Paducah, Russellville		

Overlay Alternative

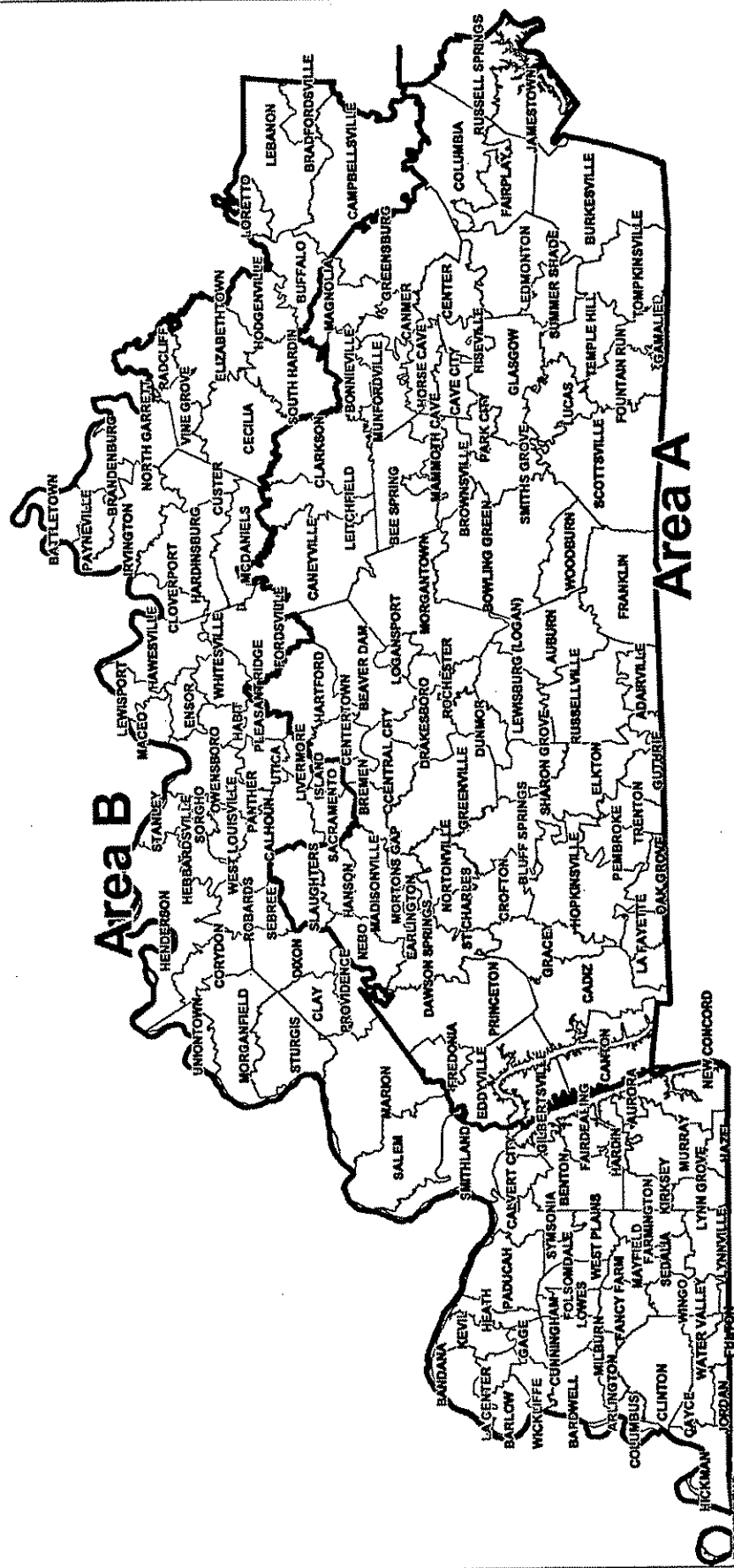
Alternative #5- All-Services Distributed Overlay

A new NPA code would be assigned to the same area covered by the current 270 NPA. Customers would keep their current telephone numbers; however, dialing of the area code would be required for all local calls. Local calling scopes are not affected. 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 code assignments will be in the overlay area code.

503 NXX Codes 167 Rate Centers Projected Life: 9 years



Alternative #1 Geographic Split



NPA 270 Map Legend

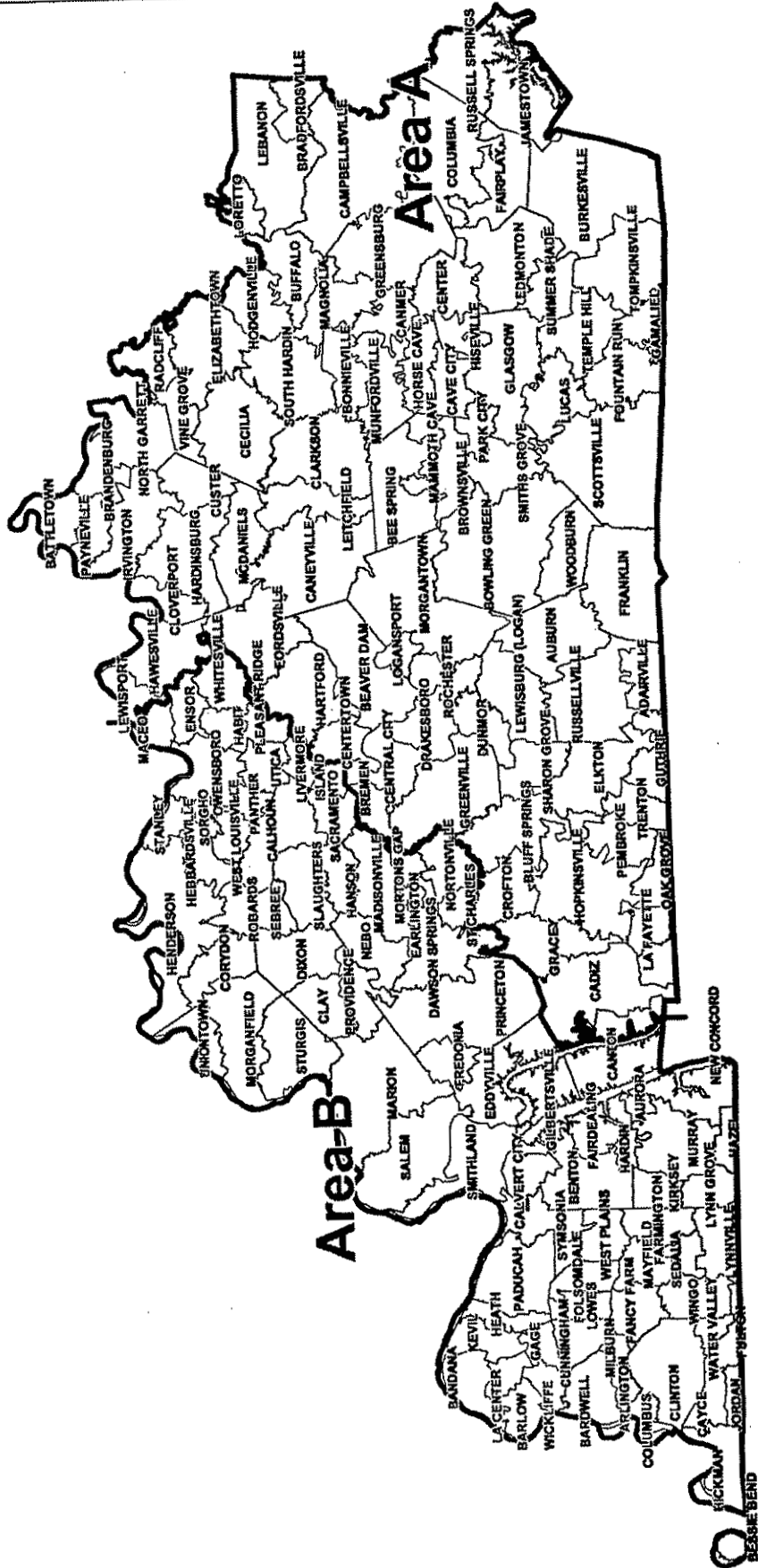
- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #1	PROJECTED LIVES
Area "A"	11 Years
Area "B"	8 Years



Kentucky NPA 270 Rate Center Map

Alternative #2
Geographic Split



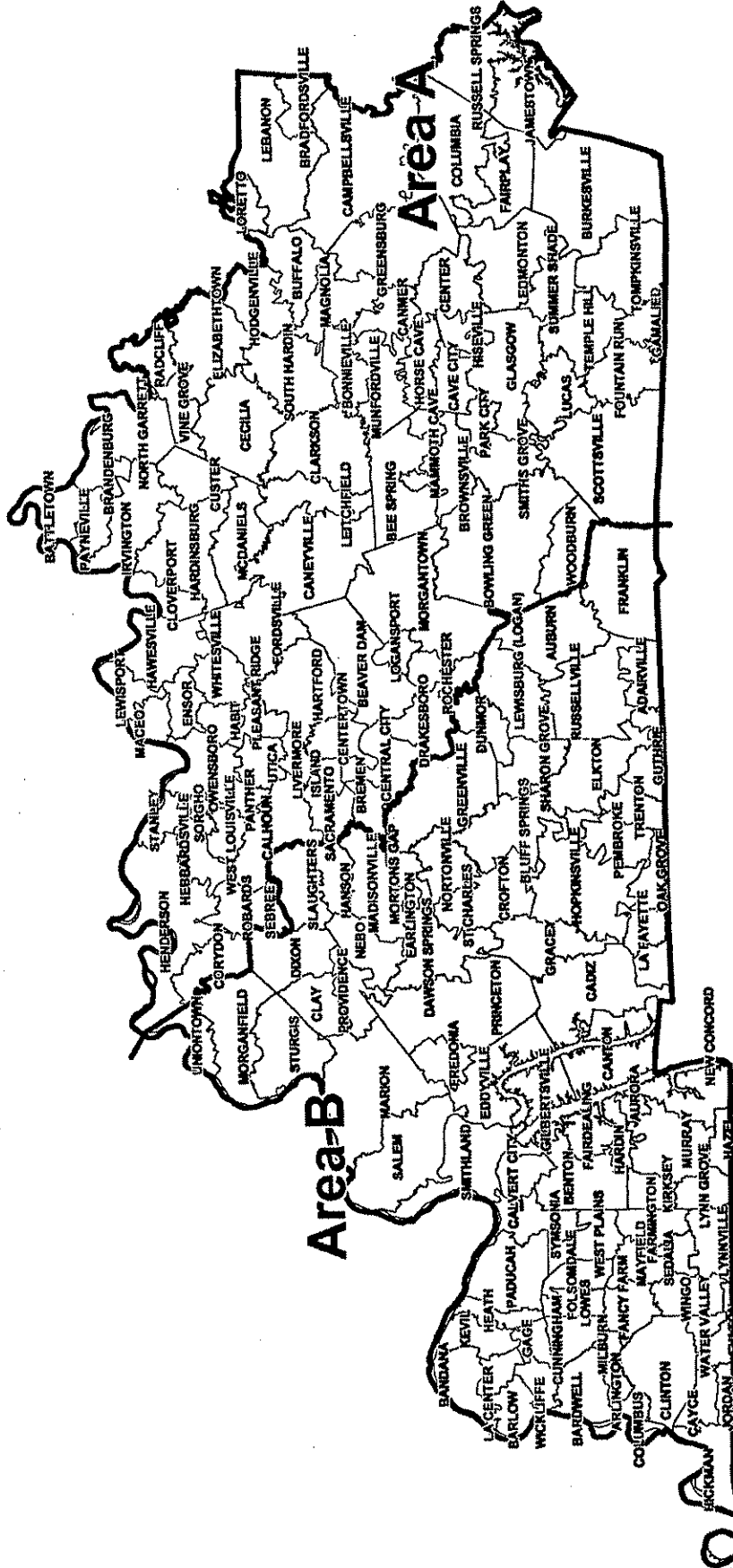
NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #2	PROJECTED LIVES
Area "A"	9 Years
Area "B"	10 Years



Alternative #3 Geographic Split



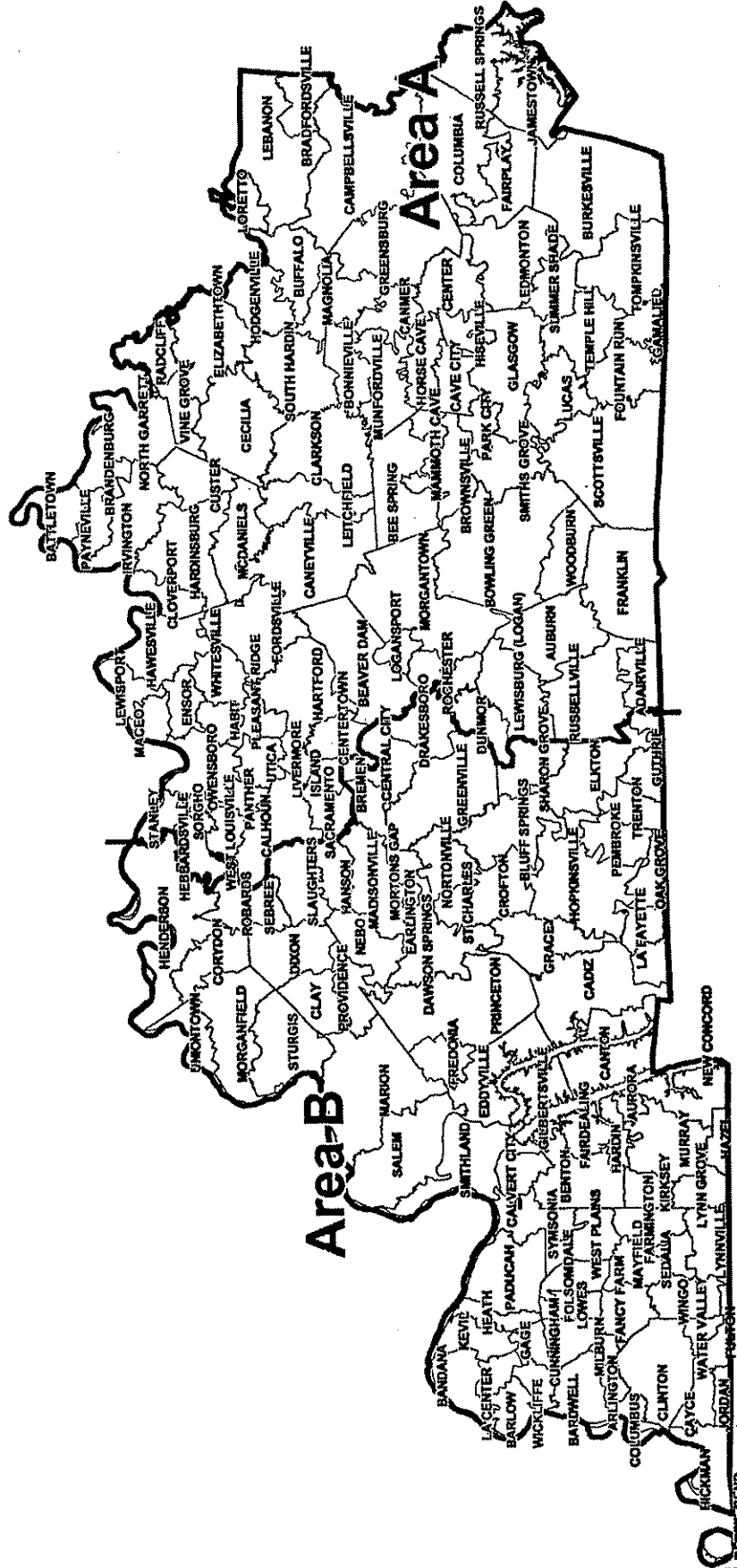
NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #3	PROJECTED LIVES
Area "A"	9 Years
Area "B"	10 Years



Alternative #4 Geographic Split



NPA 270 Map Legend

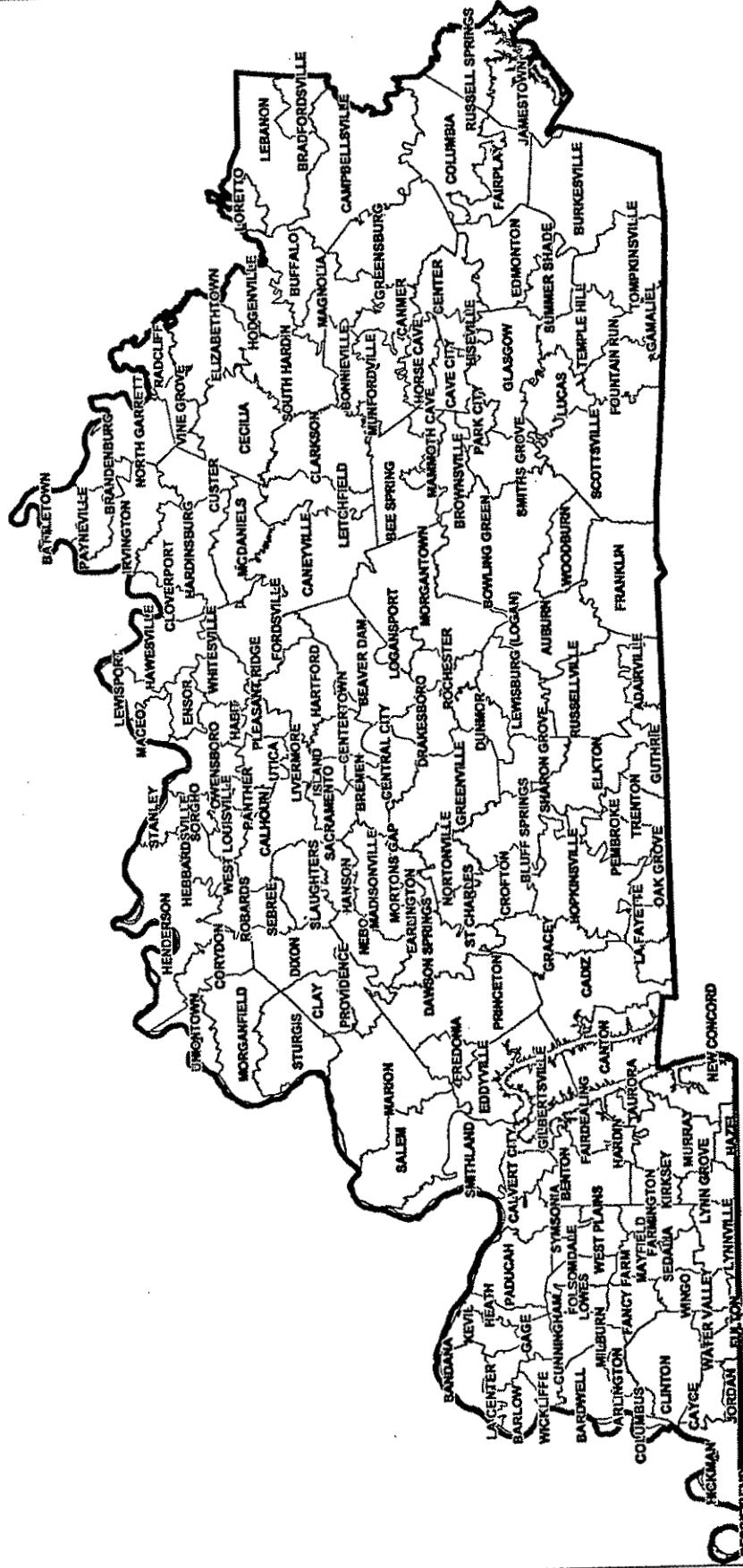
- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #4	PROJECTED LIVES
Area "A"	9 Years
Area "B"	10 Years

Kentucky NPA 270 Rate Center Map



Alternative #5
All Services Overlay



NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries

ALTERNATIVE #5	PROJECTED LIFE
Overlay NPA	9 Years

**270 NPA - Kentucky
NXX Assignments per Rate Center**

RATE CENTER	NXXs	RATE CENTER	NXXs
ADAIRVILLE	1	EDMONTON	1
ARLINGTON	1	ELIZABETHTOWN	21
AUBURN	1	ELKTON	3
AURORA	1	ENSOR	1
BANDANA	1	FAIRDEALING	1
BARDWELL	1	FAIRPLAY	3
BARLOW	1	FANCY FARM	1
BATTLETOWN	1	FARMINGTON	1
BEAVER DAM	6	FOLSOMDALE	1
BEE SPRING	1	FORDSVILLE	1
BENTON	8	FOUNTAIN RUN	1
BESSIE BEND	1	FRANKLIN	8
BLUFF SPRINGS	1	FREDONIA	1
BONNIEVILLE	1	FULTON	8
BOWLING GREEN	34	GAGE	1
BRADFORDSVILLE	1	GAMALIEL	1
BRANDENBURG	1	GILBERTSVILLE	1
BREMEN	1	GLASGOW	11
BROWNSVILLE	2	GRACEY	2
BUFFALO	1	GREENSBURG	4
BURKESVILLE	6	GREENVILLE	3
CADIZ	5	GUTHRIE	5
CALHOUN	6	HABIT	1
CALVERT CITY	1	HANSON	1
CAMPBELLSVILLE	6	HARDIN	1
CANEYVILLE	1	HARDINSBURG	3
CANMER	2	HARTFORD	2
CANTON	1	HAWESVILLE	6
CAVE CITY	1	HAZEL	1
CAYCE	1	HEATH	1
CECILIA	1	HEBBARDSVILLE	1
CENTER	1	HENDERSON	19
CENTERTOWN	1	HICKMAN	1
CENTRAL CITY	7	HISEVILLE	1
CLARKSON	1	HODGENVILLE	1
CLAY	4	HOPKINSVILLE	16
CLINTON	6	HORSE CAVE	1
CLOVERPORT	4	IRVINGTON	3
COLUMBIA	4	ISLAND	1
COLUMBUS	1	JAMESTOWN	1
CORYDON	1	JORDAN	1
CROFTON	1	KEVIL	2
CUNNINGHAM	1	KIRKSEY	1
CUSTER	1	LA CENTER	1
DAWSON SPRINGS	1	LA FAYETTE	1
DIXON	2	LEBANON	4
DRAKESBORO	1	LEITCHFIELD	4
DUNMOR	1	LEWISBURG (LOGAN)	1
EARLINGTON	1	LEWISPORT	1
EDDYVILLE	4	LIVERMORE	1

**270 NPA - Kentucky
NXX Assignments per Rate Center**

RATE CENTER	NXXs	RATE CENTER	NXXs
LOGANSFORT	1	STANLEY	1
LORETTO	1	STURGIS	1
LOWES	1	SUMMER SHADE	1
LUCAS	1	SYMSONIA	1
LYNN GROVE	1	TEMPLE HILL	1
LYNNVILLE	1	TOMPKINSVILLE	2
MACEO	1	TRENTON	1
MADISONVILLE	20	UNIONTOWN	1
MAGNOLIA	1	UTICA	1
MAMMOTH CAVE	1	VINE GROVE	1
MARION	7	WATER VALLEY	1
MAYFIELD	9	WEST LOUISVILLE	1
MCDANIELS	1	WEST PLAINS	1
MILBURN	1	WHITESVILLE	1
MORGANFIELD	6	WICKLIFFE	1
MORGANTOWN	9	WINGO	1
MORTONS GAP	1	WOODBURN	1
MUNFORDVILLE	1	(blank)	
MURRAY	10	Grand Total	503
NEBO	1		
NEW CONCORD	1		
NORTH GARRETT	1		
NORTONVILLE	1		
OAK GROVE	7		
OWENSBORO	29		
PADUCAH	28		
PANTHER	1		
PARK CITY	1		
PAYNEVILLE	1		
PEMBROKE	1		
PLEASANT RIDGE	1		
PRINCETON	4		
PROVIDENCE	2		
RADCLIFF	4		
ROBARDS	1		
ROCHESTER	1		
RUSSELL SPRINGS	3		
RUSSELLVILLE	11		
SACRAMENTO	1		
SALEM	1		
SCOTTSVILLE	3		
SEBREE	1		
SEDALIA	1		
SHARON GROVE	1		
SLAUGHTERS	1		
SMITHLAND	1		
SMITHS GROVE	1		
SORGHO	1		
SOUTH HARDIN	1		
ST CHARLES	1		

EXHIBIT B

**270 NPA - KENTUCKY
FOLLOW-UP MEETING
CONFERENCE CALL
JULY 11, 2001**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Mr. Frank Colaco, NeuStar NANPA Senior NPA Relief Planner opened the meeting with introductions, a review of the agenda and the objectives of the meeting. A list of attendees can be found in Attachment 1.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He confirmed that all participants were familiar with the consensus process and explained how consensus is determined.

REVIEW OF CONSENSUS DECISIONS REACHED AT PREVIOUS MEETING

Consensus was reached at the relief meeting held April 2, 2001 to wait until after the release of the impending 2001 NRUF data to determine if there is a change to the forecasted exhaust of the 270 NPA before NANPA files the industry's relief plan with the Kentucky Public Service Commission.

Consensus was also reached during the April 2 meeting, that the industry would have the opportunity to revisit the two recommended relief alternatives (Alternatives #5 and # 4A) one last time during the July 11 conference call, for the sole purpose of determining if there was a need to reverse the priority of the first and second choice alternative.

STATUS OF KENTUCKY 270 NPA

Mr. Colaco reviewed the current status of the 270 NPA, which reflects a total of 196 available NXX codes. The 2000 Central Office Code Utilization Survey ("COCUS") had projected exhaust of the 270 NPA is 2nd Quarter 2004. The 2001 Number Resource Utilization Forecast ("NRUF") projects an earlier exhaust of the 270 NPA, as the 2nd Quarter 2003. Additionally, the NRUF projected an average use of 6 NXX codes per month.

Since January 2001, the monthly NXX code assignments in the 270 NPA were as follows:

JAN	FEB	MAR	APR	MAY	JUN	AVG
2	2	4	6	2	4	3.3

REACH CONSENSUS TO DETERMINE FILING DATE

A proposal was made, and consensus was reached to file the Industry's Relief Plan with the Kentucky Public Service Commission on Wednesday, July 25, 2001. The filing document was reviewed and approved by the industry on a conference call that was held May 7, 2001 to approve the minutes of the April 2 meeting.

REACH CONSENSUS ON RECOMMENDED RELIEF ALTERNATIVE(S)

A proposal was made, and consensus was reached that NANPA's filing to the Kentucky Public Service Commission will reflect the original industry consensus to recommend Alternative #5 (All Service Overlay) as the first choice alternative, and Alternative #4A (NPA Split) as the second choice alternative.

NANPA indicated that it would post the minutes resulting from this conference call along with a copy of the filing to the Kentucky PSC on NANPA's Document Distribution Service (DDS) web site on July 25, 2001.

ATTACHMENT 1 TO EXHIBIT B

ATTACHMENT 1

**270 NPA - KENTUCKY
FOLLOW-UP MEETING
CONFERENCE CALL
JULY 11, 2001**

ATTENDEES

NAME	COMPANY
Warren Olson	Arch Wireless
Douglas McCullough	BellSouth
Bill Mitchell	BellSouth
Deborah Strickler	BellSouth
Jim Tipton	BellSouth
J. Wayne Bates	Kentucky Public Service Commission
Forest Skaggs	Kentucky Telephone Association
Greg Hale	Logan Telephone Coop., Inc.
Frank Colaco	NeuStar – NANPA
Tim Booth	NeuStar – NANPA
Robert Dale	South Central Rural Telephone Co-op
Dana Smith	Verizon Wireless
Catherine Rogers	Verizon Wireless