

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF THE NORTH)	
AMERICAN NUMBERING PLAN)	CASE NO.
ADMINISTRATOR FOR RELIEF OF THE 502)	2024-00333
NUMBERING PLAN AREA)	

ORDER

On October 14, 2024, the North American Numbering Plan Administrator (NANPA), which has ultimate authority over the North American Numbering Plan, submitted to the Commission an application on behalf of the Kentucky telecommunications industry (Industry) for approval of a relief plan for the 502 Area Code (502 NPA). In its filing with the Commission, NANPA estimated that the supply of the 502 NPA, serving north-central Kentucky, is projected to exhaust its Central Office (CO) codes (NXX) during the third quarter of 2027.¹ This application filed by NANPA reflected Industry's consensus decision to recommend an all-services distributed overlay plan as its preferred method of relief for 502 NPA.² On December 4, 2024, the Commission opened this administrative case to develop a 502 NPA relief plan.

BACKGROUND

The 502 NPA is one of the original area codes, created with the establishment of the North American Numbering Plan (NANP) in 1947, to serve the entire state of

¹ Application (filed Oct. 14, 2024) at 1.

² Application at 1.

Kentucky.³ In 1954, the 606 Area Code (606 NPA) was created for the eastern half of the state by a geographic split, leaving the 502 NPA for the western portion of the state.⁴ In 1998, another geographic split of the 502 NPA created the 270 Area Code (270 NPA).⁵ The first overlay in Kentucky was approved in 2012 when the 270 NPA was overlaid by the 364 Area Code (364 NPA).⁶

The 502 NPA currently serves the north central part of the state, including the capital city of Frankfort, as well as the cities of Bardstown, Carrollton, Georgetown, Jeffersontown, La Grange, Louisville, Lyndon, Mount Washington, Owenton, Sanders, Shively, Shelbyville, Shepherdsville, Taylorsville, and many other smaller communities.⁷

As required by the Federal Communications Commission (FCC), NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources, and then uses this data to project the exhaust date of each area code and publishes the results twice a year.⁸ In April 2024, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and Area Code

³ Application at 2.

⁴ Application at 2.

⁵ Administrative Case No. 373, *Area Code Exhaustion and Relief* (Ky. PSC Nov. 16, 1998), final Order.

⁶ Administrative Case No. 2012-00129, *Application of the North American Numbering Plan Administrator on Behalf of the Kentucky Telecommunications Industry for Relief of the 270 Numbering Plan Area* (Ky. PSC Dec. 17, 2012), final Order.

⁷ Application at 2-3.

⁸ Application at 3.

Exhaust Analysis, which indicated that the 502 NPA would exhaust during the third quarter of 2027.⁹

NANPA met with Industry representatives on September 10, 2024, to discuss the proposed relief alternatives and to allow Industry to arrive at a consensus on the relief alternative to recommend to the Commission. During the meeting, participants discussed five potential area code relief options, which consisted of an all-services distributed overlay plan, a geographic split, and three boundary elimination overlays.¹⁰ Upon review of the attributes of the possible relief alternatives, Industry members reached consensus to recommend the all-services distributed overlay plan to the Commission as the preferred method of relief for the 502 NPA.¹¹ The application states that Industry chose the overlay plan over the geographic split or boundary elimination alternatives because it impacts fewer customers, making customer education easier and resulting in less confusion, and is easier for service providers to implement from a translations, billing and operational support systems perspective.¹²

Consistent with FCC regulations, the overlay relief plan would require ten-digit dialing for all calls within and between the 502 NPA and the new area code.¹³ The Industry recommends a thirteen-month schedule for implementation of the overlay area code. Starting the implementation at least nineteen months prior to exhaust and adhering

⁹ The April 2024 NRUF and NPA Exhaust Forecast Analysis (April 2024 NRUF Report) can be accessed on the NANPA web site at https://www.nationalnanpa.com/reports/reports_npa.html. On and after October 28, 2024, the latest NPA exhaust projections will be available at <https://www.nanpa.com>.

¹⁰ Application at 4-7.

¹¹ Application at 8.

¹² Application at 8.

¹³ 47 C.F.R. § 52.19(c)(3)(ii).

to the Industry agreed-upon schedule will allow the new area code to be implemented six months prior to the projected exhaust of the 502 NPA.¹⁴ The proposed implementation schedule would be as follows:

EVENT	TIMEFRAME
Network Preparation Period	six months
Permissive 10-Digit Local Dialing and Customer Education Period (<i>calls within the existing 502 NPA can be dialed using 7 or 10 digits</i>) Mandatory 10-digit local dialing begins at the end of the Permissive Dialing Period	six months
First CO code activation after Mandatory 10-digit local dialing begins (<i>effective date for CO codes assigned from the new NPA</i>) *	one month (after mandatory ten-digit dialing begins)
Total Implementation Interval	13 months

* CO codes in the new NPA will not be assigned until all available CO codes in the existing 502 NPA are assigned.

As part of the relief-planning process, the Commission solicited public comments regarding the five proposed relief options of the existing 502 NPA. The Commission conducted five public meetings for the purpose of receiving public comment. Information regarding the five proposed relief options, as well as historical information related to Area Code relief, was presented at each of these events.¹⁵

DISCUSSION

Based on its review of the record, the Commission has decided to adopt the all-services distributed overlay plan as the method of relief for the 502 NPA. As a result, a

¹⁴ NPA Code Relief Planning and Notification Guidelines (NPA Relief Planning Guidelines) (ATIS-0300061, Dec. 4, 2023) at §7.2. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at <https://access.atis.org/higherlogic/ws/public/documents?view=>

¹⁵ The Hearing Videos for this case are available at psc.ky.gov.

new area code will serve the same geographic area currently served by the existing 502 NPA. The Commission finds that this relief method would ease the impact on Industry and customers alike and represents a competitively fair choice. Under this plan, all customers within the 502 NPA will be able to retain both the 502 NPA and their current seven-digit telephone number. The overlay also minimizes potential technical issues that may occur with a split and allows for a more efficient use of numbering resources within the area code.

The threshold issue in this case is to determine the most reasonable relief option for the 502 NPA. In so doing, the Commission has considered the interests of all parties affected by the imminent exhaustion of numbers in the region and has considered comments filed with the Commission or presented at the public meetings held regarding this matter. Based on the comments received, both written and at the public hearings, the public is overwhelmingly in favor of the overlay option. Many comments noted that an overlay would allow current customers in the 502 NPA to retain the 502 NPA in their phone number. Other commenters noted that wireless devices currently default to ten-digit dialing and requiring ten-digit dialing in the 502 NPA will present few disruptions.¹⁶

As a result of its decision to overlay the 502 NPA with the new area code, the Commission further determines that mandatory ten-digit dialing will be required for all calls within and between the 502 NPA and the new area code. This is pursuant to FCC requirements for the implementation of overlay plans. There currently exist some extended area service (EAS) dialing arrangements which allow customers outside the boundaries of the existing 502 NPA to complete some cross-boundary calls between area

¹⁶ Ten-digit dialing is currently mandatory in the 270/364 NPA and the 859 NPA.

codes by dialing only seven digits. In order to prevent the protection and/or assignment of certain NXX codes and to preserve the inter-area code dialing plans, the Commission has determined that all EAS dialing arrangements should require ten-digit dialing across the 502 NPA boundaries, and that the cross-boundary seven-digit dialing originating and terminating within the 502 NPA should be eliminated.

The Commission has reviewed the Industry proposal and finds that the thirteen-month implementation schedule is reasonable and should be adopted for the chosen area code relief plan. The proposed specific dates for the implementation schedule are estimated to be as follows:

EVENT	DATE
Network Preparation Period	June 1, 2026
Permissive 10-Digit Local Dialing and Customer Education Period (<i>calls within the existing 502 NPA can be dialed using 7 or 10 digits</i>)	December 7, 2026
Mandatory 10-digit local dialing begins	June 7, 2027
First code activation after Mandatory 10-digit local dialing begins (<i>effective date for CO codes assigned from the new NPA</i>) *	July 5, 2027
Total Implementation Interval	13 months

During the network preparation period, Industry should prepare its network for the necessary modifications to accommodate the overlay and should develop and begin implementation of its customer-education plan. During the permissive ten-digit dialing period, Industry should continue customer education. While customers will be able to complete calls during this timeframe using either seven-digit or ten-digit dialing, they should be encouraged to begin using ten-digit dialing for all calls. Mandatory ten-digit

dialing should begin at the end of the permissive dialing period. At that time, callers must use the area code and the seven-digit number for all local calls.

Industry should develop and implement customer education plans as soon as possible. These education plans are often done via bill inserts, customer notices, news outlets and public-service announcements. Plans should provide customers with information concerning the imminent change in dialing arrangements for the existing and new area code region, as well as information relating to the overlay plan itself and its impact on customers. In order to ensure that customers are aware of the area code overlay and associated dialing changes, each incumbent local exchange company (ILEC), competitive local exchange company (CLEC), and wireless provider should develop a customer education plan and, within 60 days from the date of service of this Order, file copies of those plans with the Commission. Customer education is always an important component of any area code relief plan.

IT IS THEREFORE ORDERED that:

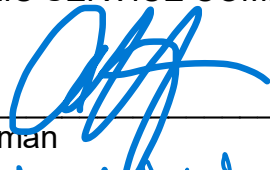
1. The methodology selected for the 502 NPA relief plan within Kentucky shall be by an all-services distributed overlay as described herein.
2. Network preparation for the overlay implementation is estimated to begin June 1, 2026. The permissive ten-digit dialing period is estimated to begin no later than December 7, 2026, and mandatory ten-digit dialing is estimated to begin no later than June 7, 2027.
3. The effective date of the new area code, or earliest date a CO code activation from the new area code may occur, is estimated to be no later than July 5, 2027.

4. All existing EAS dialing arrangements, which allow customers outside the boundaries of the 502 NPA to complete cross-boundary calls between area codes by dialing seven-digits, shall require ten-digit dialing across the 502 and new area code boundary.

5. Within 60 days from the date of service of this Order, each ILEC, CLEC, and wireless provider shall file its proposed customer education plans to the Commission.

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PUBLIC SERVICE COMMISSION


Chairman


Commissioner


Commissioner

ATTEST:


Executive Director



Case No. 2024-00333

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