



Electronically Delivered

September 16, 2025

Linda Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Re: Case No. 2024-00333, *Electronic Application of the North American
Numbering Plan Administrator For Relief of the 502 Numbering Plan Area*

Dear Executive Director Bridwell:

Enclosed for filing in the above-referenced case, please find a letter providing a notification to the Kentucky Public Service Commission ("Commission") regarding consensus agreements reached at the August 27, 2025 NPA Relief Implementation Meeting by the Industry participants relating to the delay in the establishment of implementation dates and customer education plans set forth in the Commission's July 31, 2025 Order in the above-referenced case. The enclosed filing includes the final meeting minutes of the Industry's implementation meeting.

Thank you for your assistance in this matter. If you have any questions or concerns regarding this filing, please contact the NPA Relief Planner, Cecilia McCabe, at cmccabe@nanpa.com or 925-420-0130.

Respectfully submitted,

Florence Weber
Vice President, NANPA
One Tower Center Blvd. Suite 800
East Brunswick, NJ 08816
925-420-0340
fweber@nanpa.com



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Frankfort, Kentucky 40601

Re: Case No. 2024-00333 *Electronic Application of the North American
Numbering Plan Administrator For Relief of the 502 Numbering Plan Area*

Dear Executive Director Bridwell:

On October 11, 2024, the North American Numbering Plan Administrator (“NANPA”), on behalf of the telecommunications industry (“Industry”)¹, filed *Electronic Application of the North American Numbering Plan Administrator For Relief of the 502 Numbering Plan Area* in Case No. 2024-00333. On July 31, 2025, the Kentucky Public Service Commission (“Commission”) approved an all-services distributed overlay as the relief method for the 502 NPA. The Commission ordering clauses included specific dates for implementation and customer education:

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,

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 502 NPA.

and wireless provider shall file its proposed customer education plans to the Commission.²

Pursuant to the *ATIS Industry Numbering Committee NPA Code Relief Planning and Notification Guidelines (ATIS-0300061)*, NANPA convened an Industry NPA Relief Implementation Meeting on August 27, 2025, to allow Industry members to develop an implementation plan for the new 761 NPA. After thorough discussion, Industry participants reached consensus to defer finalizing an implementation plan for the new 761 NPA and the filing of customer education plans until the updated NPA exhaust projections are published by NANPA in October 2025.

The Industry members reached consensus to defer implementation of the 761 NPA based on current forecasted demand, which projects the need for only eight (8) CO codes within the next 12 months. With 54 CO codes still available for assignment in the 502 NPA, the Industry anticipates the projected exhaust date to be extended. Because the 761 NPA will not be utilized until all 54 CO codes are assigned, deferring the implementation timeline will prevent unnecessary or premature customer education.

NANPA will reconvene the Industry after the revised NPA exhaust projections are released. At that meeting, Industry participants will decide whether to develop a new implementation schedule and customer education plan or set an additional trigger. NANPA will file the results of the Industry meeting with the Commission.

Enclosed for the Commission's reference are the final minutes from the August 27, 2025, Industry meeting.

Respectfully submitted,



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² Order, Case No. 2024-00333, Electronic Application of the North American Numbering Plan Administrator for Relief of the 502 Numbering Plan Area (rel. July 25, 2025).



September 12, 2025

To: All 502 NPA Code Holders and Interested Industry Members (Kentucky)

Subject: Final Minutes of the Initial Implementation Meeting for the 502/761 NPA

Attached are the final minutes from the August 27, 2025, Kentucky 502/761 NPA initial implementation meeting. These minutes became final on September 11, 2025.

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

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Jeb Pinney – Kentucky Public Service Commission

**Kentucky 502 NPA
All-Services Distributed Overlay
Initial Implementation Meeting
Final Minutes
August 27, 2025**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner – North American Numbering Plan Administrator (“NANPA”), 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.

CONSENSUS PROCESS, MEETING MINUTES, AND STATEMENTS FOR THE RECORD

Cecilia stated that the Alliance for Telecommunications Industry Solutions (“ATIS”) approved Industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, Cecilia 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.

PURPOSE OF THE MEETING

This meeting is being held per the ATIS Industry Numbering Committee’s NPA Code Relief Planning and Notifications Guidelines (ATIS-0300061; “*Guidelines*”) which state that NANPA will host and facilitate an Industry NPA Relief Implementation meeting following the regulatory approval of a relief plan.

Cecilia added that NANPA’s responsibilities are limited to conducting this implementation meeting and it is the responsibility of the individual service providers to implement the plan described in the Planning Letter (“PL”). NANPA will attend the Kentucky telecommunications Industry (“Industry”) committee meetings if requested but will not chair them or record minutes. Cecilia also stated that per the *Guidelines*, NANPA is required to publish the PL for the 502/761 NPA within three weeks of this meeting (by September 17, 2025).

REVIEW COMMISSION DECISION FOR THE 502 NPA

On July 31, 2025, the Kentucky Public Service Commission (“Commission”) in Case No. 2024-00333, *In the Matter of Electronic Application of the North American Numbering Plan Administrator for Relief of the 502 Numbering Plan Area*, approved an all-services distributed overlay as the relief method for the 502 NPA. On August 19, 2025, the Commission issued a press release announcing the assignment of the new 761 NPA to overlay the 502 NPA.

Cecilia stated the Order was attached to the meeting notice distributed via the NANP Notification System (“NNS”) on August 6, 2025, and a reminder notice was sent on August 25, 2025. Cecilia reviewed the ordering clauses from the Order:

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.

Cecilia stated that she had received approval from Commission staff for the Industry to comply with clause number 5 of the Order by filing a joint customer education plan. The proposed education plan must be filed with the Commission no later than September 29, 2025.

Cecilia reviewed the press release announcing the new 761 NPA to overlay the 502 NPA. The press release was issued by the Commission on August 19, 2025, and an NNS notice with the press release attached was sent out on August 21, 2025.

CENTRAL OFFICE (“CO”) CODE AND THOUSANDS-BLOCK STATUS

As of August 26, 2025, the 502 NPA has 725 CO codes assigned, 54 CO codes available for assignment, and 21 unavailable CO codes.

Cecilia reported that there are 35 rate centers in the 502 NPA; 26 are mandatory and nine (9) are optional for pooling. From the period of September 1, 2024 to August 26, 2025, 234 blocks have been assigned and 16 CO codes have been assigned; 13 for pool replenishment and three (3) for LRNs. As of August 26, 2025, there are 200 blocks available for assignment to service providers. The forecasted demand for the next 12 months is eight (8) CO codes for pool replenishment and dedicated customers.

Cecilia stated that the *Guidelines* state, “when applicable, the CO code(s) which are the same as the Home NPA and being released upon implementation of 10-digit local dialing,” are to be included in the PL. Cecilia asked participants if there was any technical reason that the 502-502 NXX could not be released for assignment concurrent with the in-service date of the new 761 NPA. No participants raised any concerns about releasing the 502-502 at the in-service date of the 761 NPA. Cecilia stated that she would include the release of the 502-502 NXX in the PL.

EXHAUST FORECAST

The 502 NPA is projected to exhaust in the third quarter of 2027 based on the April 2025 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2025 NRUF Report”). (See Attachment #2)

NPA OVERLAY IMPLEMENTATION ACTIVITIES

Cecilia reminded the attendees that in accordance with the *Guidelines*, NANPA is required to notify the Industry of the following specific NPA relief activities for the exchange of data/information to assist the Industry in the smooth implementation of any NPA relief.

The following are specific NANPA NPA Relief activities for the exchange of data/information to assist the industry in the smooth implementation of any NPA relief. NANPA will:

1) Advise industry that AOCNs should avoid last minute changes to data (e.g., information contained in the BIRRDS (the source of the iconectiv® LERG™ Routing Guide and the source of Vertical & Horizontal Master Data) that is directly related to NPA relief activity.
2) Advise industry that service providers should communicate with each other regarding changes in trunking arrangements associated with NPA relief activities.
3) Advise industry to avoid NXX activation and/or changes occurring simultaneously with an NPA split or other relief activity.
4) Include TRA on their distribution of information associated with NPA relief activity.
5) Advise industry of necessary exchange of ANI conversion schedules between SPs.
6) Advise industry of need for SPs to provide system (CARE) conversion schedule to IXC's and to TRA.
7) Advise industry that use of protected codes (NXXs), which permits 7-digit dialing, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.

Cecilia stated that the following items of interest may need to be investigated during the implementation of the 502/761 NPA all-services distributed overlay. This list is not comprehensive and is meant to be a reference for carriers' consideration.

Technical Considerations	Customer Education Considerations
Translations & Testing	General Public
Switch Recorded announcements	Businesses with or without PBXs/PABXs
Operator Services Trunking & Database	Alarm Companies
911 Trunking (MF or SS7) Routing & Databases	Directory Publishers
Directories & Directory Assistance	PSAPs
Interconnection Issues/10-digit Signaling	Calling Card Customers
Establish Communication Channels	Customers with modems and automatic dialers
Freeway Call Boxes	ISDN Customers
OSS Conversion Date	Elevator Regulatory Agencies
BIRRDS Records (LERG Routing Guide)	TTY Providers
Existing Cross-NPA 7-digit Dialing	Parole Boards
Remote Call Forwarded Numbers	Seniors

Cecilia stated that she will include more detailed information in the minutes on the technical and customer education issues to be addressed by the service providers. Many of the items are included in the *Guidelines*, Annexes F & G, which can be found on the ATIS web site www.atis.org. Annex F includes examples of potential customer issues and the possible causes. Annex G includes potential technical activities that should be taken into consideration during the implementation of a new area code.

TECHNICAL ISSUES:

Translations and Testing

Testing of translations to the new NPA should be completed.

Switch Recorded Announcements

Suggested text for these announcements is included in the *Guidelines* Annex G.

911 and Operator Services Trunking

Some SPs may have NPA-specific trunking. If MF Signaling from the end office to the 911 tandem is used, additional NPA specific MF trunks may be needed. Conversion to SS7 signaling is an alternative instead of adding additional MF trunks.

Directories and Directory Assistance

The new NPA will need to be reflected in the directory. Directory Assistance and intercept operator database information will need to be updated to reflect the new NPA.

Interconnection Issues

Interoffice trunking to tandems, some may require special attention with the NPA change.

Establish Communication Channels

SPs should share contact information with other industry members for troubleshooting for the duration of the NPA relief activity.

Freeway Call Boxes

These services are sometimes provided on major state and Interstate highways and may need to be reprogrammed.

10-digit Signaling

Conversion to 10-digit signaling is generally completed prior to mandatory dialing to make any customer complaint troubleshooting easier.

Existing Cross-NPA 7-digit Dialing

The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority. Where it is suspected that protected routes and 7-digit dialing across-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service providers or the appropriate regulatory authority.

CUSTOMER EDUCATION EFFORTS:

General Public (Section 10.0 from the *Guidelines*)

The permissive dialing period allows for customers to be educated and adjust to the dialing change. Service providers can educate their customers about the permissive dialing period as well as the change to the new dialing procedures and how these changes affect the various aspects of their lives.

Businesses with or without PBXs/PABXs (*Guidelines*, Annex F)

As with the general public, all businesses must dial 10-digits for local calls;

Business customers with PBXs/PABXs must update their equipment for 10-digit dialing as well as program them to recognize the new NPA in the translation tables. Business advertising must show the 10-digit number as well - some rural areas only advertise a 7-digit number.

Alarm Companies (*Guidelines, Annex F*)

Alarm companies must be notified to reprogram the alarm panels for 10-digit local dialing if they are dialing 7-digits today; if they use toll-free #'s, no changes are required.

Directory Publishers (*Guidelines, Annex G*)

The Directory Assistance ("DA") database information that is provided to directory publishers will need to reflect the new NPA. Directory Assistance and intercept operator database information will need to be updated to reflect the new NPA as well.

PSAPs (*Guidelines, Annex F*)

PSAPs must be notified about new NPA and to expect it when it becomes effective; PSAPs must be notified to modify their pre-programmed speed dialers to dial 10-digits.

Calling Card Customers (*Guidelines, Annex G*)

Calling cards associated with the new NPA in the area that is changing with a split may need to be reissued and calling card companies must open the new NPA at the start of permissive dialing with a split and on the activation date of a new NPA with an overlay.

Customers with modems and automatic dialers (*Guidelines, Annex F*)

Secure entry systems, AMR devices, highway emergency call boxes, voicemail-paging, speed dialing features, dial-up modems, personal computers, fax machines, ATMs, etc. must be reprogrammed for 10-digit dialing.

ISDN Customers (*Guidelines, Annex G*)

Some customer premises ISDN handsets require full 10-digit telephone number (Service Profile ID, SPID) to be programmed with the new NPA.

IDENTIFY THE IMPLEMENTATION DATES:

Cecilia stated that the Commission approved the Industry's recommended 13-month implementation timeline. The Order stated that 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.

After reviewing the proposed implementation timeline, which was based on the ordering clauses, participants discussed whether implementation should be delayed until the new NPA exhaust projections are posted in October since the forecasted demand for the next 12 months is only eight (8) CO codes which may cause the current projected NPA exhaust date to move out. Participants reached consensus to delay the posting of the PL and filing the Industry customer education plan which was stated to be filed within 60 days of the Order date, and for NANPA to reconvene the Industry after the October 2025 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2025 NRUF Report") is published on the NANPA website. NANPA agreed to file a letter with the Commission on behalf of the Industry reaching consensus to delay setting the implementation dates. NANPA will also include these meeting minutes with the filing.

The implementation of the 502/761 NPA overlay is as follows:

	Date
Network preparation and customer education begins	TBD
Start of permissive 10-digit dialing	TBD
End of permissive dialing and start of mandatory 10-digit dialing	TBD
Earliest date CO codes in the new 761 NPA may be ordered through NANPA*	TBD
Earliest new 761 NPA CO code activation date**	TBD

*CO codes in the 761 NPA are available only when all assignable CO codes in the 502 NPA are assigned.

**In-service date of the new 761 NPA overlay

DIALING PLAN

Cecilia stated that once the implementation dates are set after the October 2025 NRUF Report is published, the new dialing plan listed below will begin at the introduction of mandatory 10-digit local dialing, the dialing plan for the 502 and 761 NPAs will be as follows:

Type of call	Call terminating in	Dialing plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX) *
Toll call	HNPA or FNPA	1 + 10-digits (1 + NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0 + 10-digits (0 + NPA-NXX-XXXX)

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

TEST NUMBER

Cecilia stated that a test number is required for a new NPA per the *Guidelines* and needs to be listed in the PL. AT&T volunteered to provide the test number to verify the routing to the new 761 NPA. The test number will 761-761-1761. Dates for the test number will be provided once the implementation schedule for the 502/761 NPA all-services distributed overlay are established.

PLANNING LETTER INFORMATION

The PL information is a narrative explaining the transition and includes dates for network preparation and customer education, the in-service date of the new 761 NPA, the test number, the dialing plan, a map, and service provider contact information. Cecilia stated that based on the Industry's consensus agreement to delay implementation, the PL will not be posted until the Industry reaches consensus on the implementation timeline when the Industry reconvenes after the October 2025 NRUF Report is posted on the NANPA website.

COMPANY CONTACTS

Cecilia indicated that service provider contacts are listed in the PL to assist in the implementation of the relief plan and a contact for all CO code and thousands-block holders in the 502 NPA has been added. The service provider contact list included in the PL will be posted on the NANPA website and it can be used for trouble shooting issues during implementation of the new 761 NPA.

Cecilia asked Industry members to verify their contact information in the draft PL and to send any necessary changes to Cecilia no later than September 10, 2025, with their name, company, telephone number and email address. (See Attachment #3)

STATEMENTS FOR THE RECORD / OPEN DISCUSSION

There were no statements for the record or additional items for discussion.

MEETING MINUTES DISTRIBUTION AND APPROVAL OF THE MINUTES

The draft minutes resulting from this meeting will be distributed to the Industry by posting them on the NANPA website no later than September 10, 2025. The Industry is to provide any suggested edits to Cecilia McCabe via email at cmccabe@nanpa.com within one week of the posting at which time they will become final.

NANPA meeting adjourned.

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502/761 NPA OVERLAY INDUSTRY COMMITTEE

Cecilia received notification prior to the meeting that members of the Industry will be forming a committee to facilitate the implementation activities for the 502/761 NPA overlay once consensus is reached on an implementation timeline, and all service providers are encouraged to participate in these committee meetings. George Guerra, with AT&T, and Sharon Pistachio, with Verizon Wireless, have volunteered to co-chair the Industry committee.

Cecilia told the group that NANPA could send out a notification with the committee meeting details via the NNS when the co-chairs set up the first Industry committee meeting.

Cecilia also stated that anyone who would like to participate in the Industry committee meetings but is not included in the PL service provider contact list, should reach out directly to the Industry co-chairs to be added to the email notifications.

If you have any questions, or want to be added to the email distribution for this Industry committee, please contact the co-chairs:

George Guerra, gg2395@att.com, 415-794-7314

Sharon Pistachio, Sharon.pistachio@verizonwireless.com, 412-977-2779

The Industry co-chairs drafted a letter outlining the customer education plan to be filed with the Commission in compliance with ordering clause #5 of the Order. Because the Industry is postponing setting the implementation dates, the filing of the customer education plan will also be postponed until an implementation schedule is determined. NANPA was asked to include the letter with the minutes for service providers to review and provide any edits to the co-chairs within one week of the posting of the meeting minutes. (See Attachment #4)

The meeting was adjourned.

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These minutes became final on September 11, 2025.

**Kentucky 502 NPA
Initial Implementation Meeting via Web Conference
August 27, 2025
Participants**

NAME	COMPANY
George Guerra	AT&T
Kathy Troughton	Charter
Matt Nolan	Charter
Melinda Yost	Boost Mobile
Paul Belote	Boost Mobile
Jeb Pinney	Kentucky Public Service Commission
Margaret Cox	Lumen
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Florence Weber	NANPA
Allyson Blevins	Sinch
Jeremiah Melton	Thacker Grigsby Communications
Shaunna Forshee	T-Mobile
Brandon Orozco	Verizon
Chanda Brown	Verizon
Sharon Pistachio	Verizon Wireless

Central Office Code/Thousands-Block Summary (Data as of August 26, 2025*)						
	Assigned NXXs	Reserved NXXs	Unavailable NXXs	Available NXXs	Total	
502 NPA	725	0	21	54	800	
Codes Assignment History	2020	2021	2022	2023	2024	2025*
502 NPA	10	31	20	24	20	13
Codes Assigned (Time period: 9/1/24 - 8/26/25)	Pool Replenishment	Dedicated Customers	For LRNs	Total		
502 NPA	13	0	3	16		
Codes Forecasted for next 12 months	Pool Replenishment and Dedicated Customers	LRNs	Total			
502 NPA	8	0	8			
Thousands-Blocks	Blocks Assigned (Time period: 9/1/24 - 8/26/25)		Blocks Available*			
502 NPA	234		200			
Rate Centers	Mandatory	Mandatory Single Service Provider	Optional	Excluded	Total	
502 NPA	26	0	9	0	35	
Exhaust	Based on the April 2025 Exhaust Projections, the 502 NPA is projected to exhaust in 3Q2027.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						