



October 11, 2024

Read1st Email Application

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

Re: Read1st Case Number: 2024-00333
Electronic Application of the North American Numbering Plan Administrator For
Relief of the 502 Numbering Plan Area

Dear Executive Director Bridwell:

The North American Numbering Plan Administrator (“NANPA”) hereby submits for filing, an application on behalf of the Kentucky telecommunications industry for relief of the 502 Numbering Plan Area (“NPA”) (aka “area code”).

As the Vice President of the North American Numbering Plan Administrator (“NANPA”), I am authorized to file this application on behalf of NANPA. I have read the foregoing “Electronic Application of the North American Numbering Plan Administrator for Relief of the 502 Numbering Plan Area” (“Application”). To the best of my personal knowledge, I believe the facts stated in the Application to be true and correct.

If you have any questions regarding this filing, please contact Cecilia McCabe, NPA Relief Planner, at 925-420-0130 or me at 925-420-0340.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Florence Weber", is written over a horizontal line.

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



October 11, 2024

Email Application

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

Re: Electronic Application of the North American Numbering Plan Administrator
For Relief of the 502 Numbering Plan Area

Dear Executive Director Bridwell:

The North American Numbering Plan Administrator (“NANPA”) hereby submits for filing, an application on behalf of the Kentucky telecommunications industry for relief of the 502 Numbering Plan Area (“NPA”) (aka “area code”).

If you have any questions regarding this filing, please contact me at 925-420-0340.

Respectfully submitted,

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

NOTICE OF ELECTION OF USE OF ELECTRONIC FILING PROCEDURES

(Complete All Shaded Areas and Check Applicable Boxes)

In accordance with 807 KAR 5:001, Section 8, North American Numbering Plan Administrator ("NANPA") gives notice of its intent to file an application for Relief of the 502 NPA with the Public Service Commission no later than October 11, 2024 and to use the electronic filing procedures set forth in that regulation.

NANPA further states that:

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| 1. It requests that the Public Service Commission assign a case number to the intended application and advise it of that number as soon as possible; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. It or its authorized representatives have registered with the Public Service Commission and are authorized to make electronic filings with the Public Service Commission; | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Neither it nor its authorized representatives have registered with the Public Service Commission for authorization to make electronic filings but will do so no later than seven days before the date of its filing of its application for rate adjustment; | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. It or its authorized agents possess the facilities to receive electronic transmissions; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. The following persons are authorized to make filings on its behalf and to receive electronic service of Public Service Commission orders and any pleadings filed by any party or the Public Service Commission Staff: | | |

Name	Electronic Mail Address
Florence Weber	fweber@nanpa.com
Cecilia McCabe	cmccabe@nanpa.com
Linda Hymans	lhymans@nanpa.com

6. It and its authorized representatives listed above have read and understand the procedures for electronic filing set forth in 807 KAR 5:001 and will fully comply with those procedures unless the Public Service Commission directs otherwise.



Signed _____

Name: Florence Weber
Title: Vice President, NANPA
Address: One Tower Center Blvd Suite 800
East Brunswick, NJ 08816
Telephone Number: 925-420-0340

COMMONWEALTH OF KENTUCKY
Before the Public Service Commission

In the matter of:

Electronic Application of the North)
American Numbering Plan)
Administrator for Relief of the) **Case No: _____**
502 Numbering Plan Area)

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

The North American Numbering Plan Administrator (“NANPA”), as the neutral third-party Numbering Plan Area (“NPA”) (also referred to as “area code”) relief planner for Kentucky and on behalf of the Kentucky telecommunications industry (“Industry”),¹ hereby notifies the Kentucky Public Service Commission (“Commission”)² that the 502 NPA, serving north-central Kentucky, is projected to exhaust its Central Office codes (often referred to as “CO” or “NXX” codes) during the third quarter of 2027 and is in need of relief. This means that absent NPA relief, the supply of assignable CO codes in the 502 NPA is projected to run out during the projected exhaust quarter. The Industry reached consensus to request approval for an all-services distributed overlay to relieve the 502 NPA.

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

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

The Industry recommends the new overlay NPA for the existing 502 NPA be implemented based upon a 13-month schedule. Starting the implementation at least 19 months prior to exhaust and adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six (6) months prior to the projected exhaust of the 502 NPA.

Prompt approval of the Industry’s plan will also provide the Industry with the necessary time to prepare for the implementation and provide NANPA with the 75 calendar days needed to assign a new NPA, ensure a press release is issued to announce the new NPA, to schedule and facilitate an implementation meeting, and publish the Planning Letter(s).³ The Industry respectfully requests that the Commission promptly approve the Industry’s plan and issue its final decision to implement the overlay as set forth herein, no later than July 31, 2025.

I. 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 Kentucky. In 1954, the 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. In 1999, another geographic split of the 502 NPA created the 270 NPA. In 2000, the 859 NPA was created by a geographic split of the 606 NPA. The first overlay in Kentucky was implemented in 2014 when the 270 NPA was overlaid by the 364 NPA.

The 502 NPA now serves a north central part of the state including the capitol city of Frankfort, as well as the cities of Bardstown, Carrollton, Georgetown, Jeffersontown, La Grange, Louisville, Lyndon, Mount Washington, New Albany, Owenton, Sanders, Shively,

³ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, December 4, 2023) at §5.10.1 (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines can be accessed on the ATIS website located at <https://access.atis.org/higherlogic/ws/public/documents?view=>

Shelbyville, Shepherdsville, Taylorsville, and many other communities.

The 502 NPA is bordered on the north and west by the Indiana 812/930 NPAs, to the south and east by the 859 NPA and to the west by the 270/364 NPAs.

II. Description of Relief Alternatives

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. In April 2024, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2024 NRUF Report”) which indicated that the 502 NPA would exhaust during the third quarter of 2027.⁴

NANPA initially determined there were three possible alternatives for relief of the 502 NPA: 1) an all-services distributed overlay involving the addition of a new NPA; 2) a geographic split of the 502 NPA; and 3) a boundary elimination overlay with the adjacent 270/364 overlay. NANPA distributed an Initial Planning Document (“IPD”) containing the three NPA relief alternatives to the Industry along with the meeting notice on August 12, 2024.

On September 6, 2024, a service provider requested that NANPA develop two additional boundary elimination relief alternatives. NANPA created the additional alternatives and added them to the IPD which was distributed to the Industry in the meeting reminder notice that same day.⁵

NANPA convened an Industry NPA relief planning meeting via web conference on

⁴ 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>.

⁵ Exhibit A includes NANPA’s September 6, 2024, notice to the Industry, the updated IPD, as well as CO code assignment information, thousands-block pooling statistics, and maps of the two additional alternatives.

September 10, 2024, to review the following five relief alternatives included in the IPD:

- **Alternative #1: An all-services distributed overlay of the 502 NPA with a new overlay NPA.**

A new overlay NPA code would be assigned to the same geographic area occupied by the existing 502 NPA. CO codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 502 NPA have been allocated. Customers would retain their current telephone numbers, and ten-digit local dialing would be required within and between the 502 NPA and the new overlay NPA.

The projected life for Alternative #1, based on current demand, is 30 years.

- **Alternative #2: A Geographic Split of the 502 NPA**

The 502 NPA would be split to become two distinct geographic areas, and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made by NANPA or the Industry for which side of the split line would retain the 502 NPA and which side would receive the new NPA as that decision is determined by the Commission. Within each NPA, seven-digit local dialing would be permitted but ten-digit local dialing will be required between the two NPAs. The proposed boundary would split the 502 NPA resulting in the western section of the 502 NPA, designated as Area A, and the eastern section of the 502 NPA designated as Area B, as presented in the Alternative #2 - 502 NPA Split Map in the IPD.

At the current assignment rate, the projected life for each NPA area in Alternative #2 would be:

Area A:

Total Rate Centers: Six (6)
Projected NPA life in years: 33

Area B:

Total Rate Centers: 29
Projected NPA life in years: 30

- **Alternative #3: A boundary elimination overlay of the 502 and the 270/364 overlay NPAs.**

The boundary between the existing 502 NPA and 270/364 overlay NPAs would be eliminated. The 502 and 270/364 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls within and between the 502 and 270/364 NPAs would be required. The 502 NPA currently has seven-digit local dialing and would need to transition to ten-digit local dialing. However, no change to the dialing plan is required for the 270/364 NPA as it already requires ten-digit local dialing.

Available CO codes in the 502 NPA will be assigned upon request in the 270/364 NPA with the effective date of the new NPA boundary elimination and available 270/364 NPA CO codes could be assigned upon request in the 502 NPA area. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364 NPAs supply of CO codes.

The 270/364 NPA has 170 rate centers, and the current projected exhaust is 3Q2080. Eliminating the boundary between the 502 NPA and 270/364 NPAs would result in 205 rate centers within the proposed 270/364/502 NPA overlay.

At the current assignment rate, this alternative has a life of 17 years. The 270/364 NPA would have a reduction in the projected exhaust date by 36 years.

- **Alternative #4: A boundary elimination overlay of the 502, 606, 859, and 270/364 NPAs**

The boundaries between all existing Kentucky NPAs, 270/364, 502, 606, and 859, would be eliminated creating one statewide NPA overlay area. The 270/364, 502, 606, and 859 NPA customers would retain their current telephone numbers; however, ten-digit local dialing for all calls within and between the 270/364, 502, 606, and 859 NPAs affected area would be required. The 502 and 606 NPAs currently have seven-digit local dialing and would need to transition to ten-digit local dialing. However, no change to the dialing plan is required for the 859 and 270/364 NPAs as they already require ten-digit local dialing.

Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 NPA area with the effective date of the NPA boundary elimination and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPAs areas. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364, 606, and 859 NPAs supply of CO codes.

The 606 NPA has 125 rate centers, and the current projected exhaust is 2Q2034. The 859 NPA has 42 rate centers, and the current projected exhaust is 4Q2045. Eliminating the boundaries between the 270/364, 502, 606, 859 and NPAs would have 372 combined rate centers.

However, at the current assignment rate, Alternative #4 has a projected life of 14 years and therefore does not meet the NPA Relief Planning Guidelines which state: *The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during*

*the time frame.*⁶ As a result, this Alternative was not considered by the Industry.

- **Alternative #5: A boundary elimination overlay of the 502, 606, 859 and 270/364 NPAs with the addition of a new overlay NPA**

The boundaries between the existing 270/364 502, 606, and 859 NPAs would be eliminated and a new NPA would be assigned to the new combined NPA overlay area. The 270/364 502, 606, and 859 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls within and between the 270/364 502, 606, and 859 NPAs and new overlay NPA would be required. The 502 and 606 NPAs currently have seven-digit local dialing and would need to transition to ten-digit local dialing. However, no change to the dialing is required for the 859 and 270/364 NPAs as they already require ten-digit local dialing.

Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 NPA area with the effective date of the new NPA boundary elimination and the implementation of the new overlay NPA and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPA area. CO codes from the new overlay NPA would be assigned only after the existing supply of CO codes in the 270/364 502, 606, and 859 NPAs are exhausted.

Eliminating the boundaries between the 270/364 502, 606, and 859 NPAs and adding a new overlay NPA would result in 372 rate centers in the new overlay NPA area. At the current assignment rate, Alternative #5 has a projected life of 26 years.

This relief alternative would give the entire state a uniform dialing plan and would increase the projected life of the 606 NPA by nine years, thus delaying the

⁶ NPA Relief Planning Guidelines at §5(a).

need for NPA relief there but would decrease the current projected life of the 859 NPA by two years and the 270/364 NPAs by 37 years.

III. Description of the Recommended Relief Alternative

At the relief planning meeting, the Industry participants discussed the attributes of the four possible relief alternatives that adhere to the NPA Relief Planning Guidelines, and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay of the 502 NPA.⁷ The all-services distributed overlay would add a new NPA over the same geographic area covered by the existing 502 NPA and is projected to last approximately 30 years. NANPA will assign CO codes from the new overlay NPA once all available CO codes from the 502 NPA are assigned. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers.

The Industry recommends the all-services distributed overlay alternative because:

- It impacts fewer customers than the other relief alternatives,
- It is easier for service providers to implement from a translations, billing, and operational support systems perspective,
- The customer confusion and additional work required for the boundary elimination overlay alternatives exceeds any benefit they provide.

The Industry also established, by consensus, a relief implementation schedule which includes flexible timeframes so that the Industry can accommodate certain holidays, high network traffic days, network freeze periods, and implementation dates for other NPA relief implementation activities occurring in other parts of the country. The Industry recommends a 13-month schedule for implementation of the overlay NPA. Starting the implementation at

⁷ The September 10, 2024, meeting minutes, which contain the pros and cons to each alternative, is attached as Exhibit B.

least 19 months prior to exhaust, and adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six (6) months prior to the projected exhaust of the 502 NPA.⁸

The Industry-recommended dialing plan for the 502 NPA all-services distributed overlay is set forth in the table below and consistent with the existing 270/364 overlay and 859 NPA dialing plans:

DIALING PLAN
Dialing Plan for the 502 NPA All-Services Distributed Overlay

TYPE OF CALL	CALL TERMINATING IN	DIALING PLAN
Local	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX) *
Toll	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 local dialing permissible at service provider’s discretion.

The Industry reached consensus to implement the new relief NPA in accordance with a 13-month schedule as set forth in the following table:

IMPLEMENTATION TIMEFRAME SCHEDULE
for the 502 NPA All-Services Distributed Overlay

Event	Timeframe
Network Preparation Period	6 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>)	6 months
Mandatory 10-digit local dialing begins at the end of the Permissive Dialing Period	

⁸ NPA Relief Planning Guidelines at §7.2.

First CO code activation after Mandatory 10-digit local dialing begins (effective date for CO codes assigned from the new NPA) *	1 month (after Mandatory 10-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.

The Commission’s prompt approval of this Application and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers’ customers due to the unavailability of CO codes.

In addition to the Industry-recommended timeframes, NANPA should be provided approximately 75 calendar days from the date of the Commission order (or other written approval) to assign a new NPA, ensure a press release is issued to announce the new NPA, schedule and facilitate an implementation meeting with the Industry, and publish the Planning Letter(s).

The following tables outline the Customer Education and Technical Milestones the Industry typically utilizes for implementation of an NPA overlay, when the dialing plan changes from seven-digit local dialing to mandatory ten-digit local dialing.⁹

CUSTOMER EDUCATION MILESTONES

	Customer Education Milestones	Responsibility
1	Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2	Issue initial press release announcing the new overlay NPA	State Commission and All Service Providers (optional to service providers)
3	Send Special letters to PSAPs, Alarm & Safety, Pay Telephone, and Directory Publishers	Industry committee co-chairs
4	Update social media platforms with information regarding new NPA	All Service Providers (optional) & NANPA
5	Update websites with information regarding the new	All Service Providers

⁹ The Customer Education and Technical Milestones outlined herein may be modified by agreement of the Industry members if required.

	Customer Education Milestones	Responsibility
	NPA	
6	Develop language for use in directories to alert the consumers of 10-digit local dialing and the new NPA	Directory Publishers
	After Permissive 7 and 10-Digit Dialing Period Begins	
7	Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
8	Send reminder notification to PSAPs, Alarm & Safety, Pay Telephone, and Directory Publishers	Industry committee co-chairs
9	Update social media platforms with information regarding new NPA	All Service Providers (optional) & NANPA
10	Update websites with information regarding new NPA	All Service Providers
11	Issue second mandatory press release just prior to the mandatory dialing date and/or new overlay NPA's effective date	Commission and Service Providers that have the ability (if necessary)

TECHNICAL MILESTONES

	Technical Milestones	Responsibility
1	Obtain industry test code from NANPA and activate the test number	One Service Provider Volunteer
2	Open the test code in carriers' network	All Service Providers
3	LERG updates in BIRRDs or via AOCN (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	All Service Providers
4	Ensure highway call boxes are programmed with 10-digit dialing	Industry committee co-chairs
5	Network ready for permissive dialing	All Service Providers
6	Create permissive dialing Industry contact list	Industry committee co-chairs
	Permissive Dialing Period Begins	
7	Establish NPA Specific type of Trunks	All Service Providers (as needed)
8	Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9	Send email to Industry committee co-chairs when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Service Providers
11	Recorded announcements in place and tested	All Service Providers
	E911 Work Plan	
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA if needed	E911 Providers

13	Ensure SRDB table has been updated with the new NPA	E911 Providers
14	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15	Notify Statewide 911 Coordinator	Co-chairs
16	Review and submit CLEC trunk order requests to local provider if needed	All Service Providers (as needed)
17	Update PSAP equipment to recognize new NPA	PSAP's
18	Trunk orders complete	All Service Providers (if needed)
19	Build E911 Network/Tandem Translations	E911 Providers
20	Verify if all PSAP work has been completed	PSAP's
21	Activate E911 Network/Tandem Translations	E911 Providers

III. Conclusion

The Industry requests that the Commission issue an order in response to this Application approving the all-services distributed overlay relief plan for the 502 NPA and the recommended implementation schedule without a hearing. To the extent possible, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this

Application, the Industry will implement an all-services distributed overlay NPA over the 502 NPA in accordance with the implementation schedule set forth above. As such, the Industry requests that the Commission grant this Application no later than July 31, 2025.

Respectfully submitted,



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

Cecilia McCabe
NPA Relief Planner, NANPA
One Tower Center Blvd
Suite 800
East Brunswick, NJ 08816
925-420-0130
cmccabe@nanpa.com

October 11, 2024

EXHIBIT A



September 6, 2024

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

Subject: Reminder Notice of Kentucky 502 NPA Initial Planning Document Review Meeting & Revised Initial Planning Document

This is a reminder notice for the Kentucky 502 NPA Initial Planning Document Review Meeting. Please note that at the request of a service provider, two additional relief alternatives have been added to the Initial Planning Document (“IPD”) for the telecommunications industry of Kentucky (“Industry”) to review at the meeting on September 10, 2024. The relief alternatives are a boundary elimination overlay of the entire state and a boundary elimination overlay of the entire state with a new overlay NPA. Because the additional alternatives include the 606 and 859 NPAs, the thousands-block statistics, Central Office (“CO”) code summaries, Service Provider CO code assignments by OCN, and rate center data have also been included in the revised IPD for these NPAs.

The North American Numbering Plan Administrator (“NANPA”) is responsible for initiating area code relief in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented in accordance with the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061). The April 2024 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2024 NRUF Report”), published by NANPA, indicated that the 502 NPA would exhaust during the third quarter of 2027. Relief planning for the 502 NPA is to start in the third quarter of 2024.

Accordingly, on September 10, 2024, NANPA will convene an industry NPA relief planning meeting via web conference to review the IPD and develop a recommended relief plan for the 502 NPA. The objective of this meeting is to reach consensus among members of the Industry on a single relief plan for the 502 NPA. The resulting relief plan will be filed in a petition with the Kentucky Public Service Commission (“Commission”) for their consideration and approval. The industry-recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (“ATIS”) will be applied in the decision-making efforts.

Included with this meeting notice is the meeting agenda, consensus process, 502 NPA CO code and thousands-block status reports, relief planning meeting aids, service provider CO code assignments by OCN, rate centers in the 502 NPA, and associated maps. Because there are relief alternatives outlined in this notice that include the 270/364 NPA, 606 NPA, and 859 NPA the thousands-block statistics, CO code summaries, Service Provider CO code assignments by OCN, and rate center data are also included for these NPAs.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on September 10, 2024. This may be the only Industry meeting before a decision is reached on a

recommended relief plan that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Tuesday, September 10, 2024

Time: 1:00 pm, ET; 12:00 pm CT; 11:00 am MT; 10:00 am PT

Join Zoom Meeting

<https://somos.zoom.us/j/89380663752?pwd=2X8pGw5jRTBkF6CaCwbLz8i8VCvIrlE.1&from=addon>

Meeting ID: 893 8066 3752

Password: 233086

One tap mobile

8778535257,,89380663752# US Toll-free

8884754499,,89380663752# US Toll-free

Dial by your location

877 853 5257 US Toll-free

888 475 4499 US Toll-free

Meeting ID: 893 8066 3752

If you receive this notice from someone else and would like to receive additional information in the future about the 502 NPA relief project, please sign up for NANPA's NAS-NNS by going to www.nationalnanpa.com, select NAS Login, then New Registration, and complete the sign-up process.

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

Sincerely,

Cecilia McCabe

NPA Relief Planner

NANPA

cc: Jeb Pinney – Kentucky Public Service Commission

**Kentucky 502 NPA
Initial Relief Planning Meeting
via Web Conference**

September 10, 2024 - 1:00 PM (ET)

AGENDA

Welcome, Introductions, Consensus Definition

NANPA's Role and Responsibilities

Review INC Guidelines

Review NPA Status

Review Initial Planning Document and Proposed Alternatives

Review Relief Alternatives Pros and Cons

Consensus on Relief Alternative

Consensus on Implementation Interval

Consensus on Customer Education and Technical Milestones

Consensus on Approval & Filing

Open Discussion/Statements for the Record

Posting of Minutes

Adjourn

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

5 NPA Relief Planning Process

NPA Relief Planning Process

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

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, expansion of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.
- e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.
- f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7-digit dialing across the NPA boundary (where 10-digit local dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹
- g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the

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

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

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

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

5.1 Determine the Expected NPA Exhaust Period

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

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

5.2 Identify the Alternative Relief Methods Available

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

5.3 Define the Attributes of Each Alternative or Method

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

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

The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the

method to be adopted. The IPD should be provided at least four (4) weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.

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

Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration³. NANPA shall moderate these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry consensus, subsequent meetings/conference calls shall be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

Alternative Relief Methods

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

6.1 NPA Split Method

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

6.2 Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift/realignment occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change, and number changes are mandatory for customers assigned numbers from NXX codes that are moved to the adjacent

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

NPA. This method applies to multi-NPA states or provinces only. Boundary realignments must follow rate center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Distributed Overlay Method⁴

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

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

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be considered where the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast-growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new NXXs in that section would be assigned from the new NPA. As the NXXs allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available NXXs to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit local dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA. A concentrated growth overlay may cause customer dialing confusion and additional technical work for some SPs and may require a longer implementation interval.

6.3.2 Boundary Elimination Overlay

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and available NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs and may require a longer implementation interval.

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

⁵ 47 CFR §52.19 (c) (3) (ii).

6.3.3 Multiple Overlay

The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists. Multiple overlays may require additional technical work for some SPs and may require a longer implementation interval.

6.3.4 Technology-Specific or Service-Specific Overlay

These overlays occur when a new area code is introduced to serve the same geographic area as one or more existing area code(s) and numbering resources in the new area code overlay are assigned to a specific technology(ies) or service(s). State commissions may not implement a technology-specific or service-specific overlay without express authority from the FCC.⁶ Such overlays are not feasible where local number portability and/or thousands-block pooling have been implemented. For purposes of relief planning, a technology-specific or service-specific overlay shall not be considered by the NANPA or the industry.

A state commission seeking delegated authority from the FCC to implement a technology-specific or service-specific overlay should discuss why the numbering resource optimization benefits of the proposed overlay would be superior to implementation of an all-services distributed overlay.⁷

6.4 Other Relief Methods

A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlays, as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations, projected exhaust, and community needs and requirements.

Other Relief Planning Considerations

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

7.1 Regulatory Involvement

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

7.2 Timing and Schedules

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed

⁶ 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶¶67-94.

⁷ See FCC 01-362 ¶¶ 81-94.

at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

Annex B

Issues To Be Considered During NPA Relief Planning

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

Subscribers

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

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks
- LNP compliance impacts

Industry Concerns

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

Annex E

General Attributes of the Most Common Relief Alternatives

Geographic Splits	All-Services Overlays
<ul style="list-style-type: none"> Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area. 	<ul style="list-style-type: none"> With an overlay there will be more than one area code in a geographic area.
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> An overlay will not require existing customers to change their area code.
<ul style="list-style-type: none"> Geographic splits permit 7-digit dialing within an area code. 	<ul style="list-style-type: none"> An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
<ul style="list-style-type: none"> Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code. 	<ul style="list-style-type: none"> There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.
<ul style="list-style-type: none"> Future splits will reduce the geographic size of the area code. 	<ul style="list-style-type: none"> An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

**Relief Planning Meeting Aid
Pros and Cons of NPA Relief Planning Alternatives**

This meeting aid is a compilation of Industry developed Pros and Cons of relief alternatives from recent NPA relief planning meetings and is prepared to assist the participants in evaluating the attributes of the relief alternatives being considered.

All-Services Distributed Overlay Pros				
Alternative #				
				1 All existing customers would retain the 502 area code and would not have to change their telephone number(s)
				2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
				3 Less customer confusion and easier education process
				4 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers
				5 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers
				6 No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split
				7 Minimizes call routing issues, especially with ported numbers
				8 Easier for service providers to implement from a translations, billing and service order system perspective
				9 Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
				10 The Commission would not have to decide which side retains the 502 area code, as would be required for a geographic split
				11 Does not split cities or counties into different area codes
				12 Does not impact some wireless carriers that have to reprogram handsets manually
				13 No technical impacts to number portability, text messaging or multimedia messaging
				14 An all-services distributed overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice as would be required for an NPA split or boundary elimination overlay
				15 Helps move customers toward nationwide 10-digit local dialing
				16 Transitioning to 10-digit local dialing will enable Central Office codes protected for 7-digit dialing routes to be released for assignment

**Relief Planning Meeting Aid
Pros and Cons of NPA Relief Planning Alternatives**

All-Services Distributed Overlay Cons					
Alternative #					
					1 Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 502 NPA and the new overlay NPA
					2 Financial costs to add new NPA to signage and printed material where only 7-digit number is shown
					3 Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.)
					4 Loss of geographic identity with an overlay if assigned a telephone number in the new NPA
					5 Confusion due to differences in state dialing requirements between local and toll calling; customers dialing 10 digit vs 1+10 digit for local calls

NPA Split Pros					
Alternative #					
					1 Maintains seven-digit dialing for local calls within the same NPA.
					2 Approximately half of the customers would not experience a change if they keep the 502 NPA.
					3 Projected lives are balanced.
					4 The projected lives are slightly more balanced than Alternative #.
					5 This alternative allows _____ to maintain operations on one side of the split line.
					6 Maintains geographic identity of the 502 area code.
					7 Keeps the rate centers on both sides of the split lines intact.

NPA Split Cons					
Alternative #					
					1 Requires approximately half of 502 NPA customers to change their area code
					2 Financial impact to businesses moving to the new NPA to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers or are close to the split line
					3 Creates widespread customer 10-digit dialing confusion across the new NPA boundary
					4 All 502 NPA customers previously went through a split 25 years ago and

Relief Planning Meeting Aid
Pros and Cons of NPA Relief Planning Alternatives

				half will have to change their area code again
			5	Difficult Commission decision on which side retains the {NPA} NPA
			6	Longer time period needed for service providers to implement this type of relief
			7	Customers whose numbers change must contact friends, family and business associates with the telephone number changes
			8	More complicated and costly to implement for service providers in their billing, translations and database systems
			9	Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers
			10	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers
			11	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA
			12	Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers
			13	Split requires significant challenges to service provider's operational support systems and network elements
			14	Splits cause customer confusion with caller ID during implementation
			15	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing
			16	Splits require the {NPA} NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests
			17	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line
			18	Splits require the 800/SMS database to be updated
			19	Splits reduce the geographic area served by one area code
			20	Splits the city(s), counties or legislative districts into different area codes
			21	Splits communities of interest
			22	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the {NPA} area code during the permissive dialing period
			23	The last split implemented was in 2007. There is additional complexity to implement a split now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.
			24	This split disrupts the SP's host-remote switch arrangement
			25	Splits _____ operating territory between two NPAs
			26	_____ EAS calling is heavily disrupted

**Relief Planning Meeting Aid
Pros and Cons of NPA Relief Planning Alternatives**

Boundary Elimination Overlay Pros					
Alternative #					
					1 Eliminates the need to open a new NPA
					2 Does not require customers to change their area code
					3 The boundary elimination overlay is a more efficient use of resources

Boundary Elimination Overlay Cons					
Alternative #					
					1 Boundary elimination overlay relief alternative(s) have shorter lives than the all-services distributed overlay
					2 Impacts larger quantity of customers than the all-services distributed overlay
					3 Requires customers in either {NPA} or {NPA} NPAs to dial 10 digits where otherwise they wouldn't be subjected to NPA Relief for another {XX} years
					4 Complex customer education process, which would likely lead to increased customer confusion

**Relief Planning Meeting Aid
Dialing Plans and Implementation Intervals**

This meeting aid has examples of Industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

DIALING PLAN OPTIONS

OVERLAY DIALING PLAN (10D)

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 permissible at each service provider’s discretion

OVERLAY DIALING PLAN (1+10D)

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	1+10 digits (1+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)

*10-digit local dialing permissible at each service provider’s discretion

GEOGRAPHIC SPLIT DIALING PLAN (7D)

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

**Relief Planning Meeting Aid
Dialing Plans and Implementation Intervals**

IMPLEMENTATION SCHEDULES
OVERLAY IMPLEMENTATION SCHEDULE – OPTION 1
(10-digit dialing in place)

Event	Timeframe
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period ends	9 months after the Implementation Start Date selected by the Industry
Earliest Activation of CO codes in the new NPA *	At completion of Customer Education and Network Preparation Period and after all existing {NPA} NPA CO codes are allocated <i>Six months prior to exhaust or no later than {Insert Quarter and year}</i>

**CO codes in the new NPA will not be assigned until all available CO codes in the existing {NPA} NPA have been allocated.*

OVERLAY IMPLEMENTATION SCHEDULE – OPTION 2
(10-digit dialing in place)

Event	Timeframe
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period Ends	8 months after the Implementation Start Date selected by the Industry
Earliest Activation of CO Codes in the new NPA*	1 Month after the completion of Customer Education and Network Preparation Period and after all existing {NPA} NPA CO codes are allocated <i>Six months prior to exhaust or no later than {Insert Quarter and year}</i>

**CO codes in the new NPA will not be assigned until all available CO codes in the existing {NPA} NPA have been allocated.*

**Relief Planning Meeting Aid
Dialing Plans and Implementation Intervals**

OVERLAY IMPLEMENTATION SCHEDULE

(7-digit dialing in place)

Event	Timeframe
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within existing {NPA}NPA can be dialed using 7 or 10 digits)</i> Mandatory 10-digit local dialing period begins at the end of the Permissive Dialing Period	6 months
First CO code activation after Mandatory 10-digit local dialing period begins <i>(Effective date for CO codes from the new NPA) *</i>	1 month (after Mandatory Dialing Period begins)
Total Implementation Interval	13 months

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

GEOGRAPHIC SPLIT IMPLEMENTATION SCHEDULE

Event	Timeframe
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period <i>(Calls originating from the home NPA or new NPA and terminating to the home NPA or new NPA can be dialed using 7 or 10 digits.)</i> Mandatory 10-digit Dialing Period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First CO code activation <i>(Effective date for CO codes from the new NPA)</i>	End of Recorded Announcement Period
Total Implementation Interval	15 months

**Relief Planning Meeting Aid
Customer Education and Technical Milestones**

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

	Customer Education Milestones	Responsibility
1	Issue {first/single} customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
2	Issue initial press release announcing the new overlay NPA	
3	Send notification of the new NPA to directory publishers	
4	Update social media platforms with information regarding new NPA	
5	Update websites with information regarding the new NPA	
6	Develop language for use in directories to alert the consumers of the new NPA	
After Permissive 7 and 10-Digit Dialing Period Begins		
7	Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
8	Send reminder notification to PSAPs and directory publishers	
9	Update social media platforms with information regarding new NPA	
10	Update websites with information regarding new NPA	
11	Issue second press release just prior to the new NPA effective date	

	Technical Milestones	Responsibility
1	Obtain industry test code from NANPA and activate the test number	
2	Open the test code in carriers' network	
3	LERG updates in BIRRDS or via AOCN (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	
4	Ensure highway call boxes are programmed with 10-digit dialing	
5	Network ready for permissive dialing	
6	Create permissive dialing Industry contact list	

**Relief Planning Meeting Aid
Customer Education and Technical Milestones**

Permissive Dialing Period Begins		
7	Establish NPA Specific type of Trunks	
8	Completion of 10-digit signaling transition between carriers' networks	
9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
11	Recorded announcements in place and tested	
E911 Work Plan		
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA if needed	
13	Ensure SRDB table has been updated with the new NPA	
14	Notify PSAPs, PSALI customers and County Coordinators	
15	Notify Statewide 911 Coordinator	
16	Review and submit CLEC trunk order requests to local provider if needed	
17	Update PSAP equipment to recognize new NPA	
18	Trunk orders complete	
19	Build E911 Network/Tandem Translations	
20	Verify if all PSAP work has been completed	
21	Activate E911 Network/Tandem Translations	

The above are the typical milestones necessary for implementation of an {insert Industry recommended relief alternative} when transitioning from 7 to 10-digit local dialing; however, these milestones may need to be modified during the actual implementation.

KY 502 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
502	BAGDAD	BAGDAD
502	BARDSTOWN	BARDSTOWN
502	BEDFORD	BEDFORD
502	BLOOMFIELD	BLOOMFIELD
502	CAMPBELSBG	CAMPBELLSBURG
502	CARROLLTON	CARROLLTON
502	CHAPLIN	CHAPLIN
502	CROPPER	CROPPER
502	EMINENCE	EMINENCE
502	FINCHVILLE	FINCHVILLE
502	FRANKFORT	FRANKFORT
502	GEORGETOWN	GEORGETOWN
502	GHENT	GHENT
502	LA GRANGE	LA GRANGE
502	LAWRENCEBG	LAWRENCEBURG
502	LEBANONJCT	LEBANON JUNCTION
502	LOUISVILLE	LOUISVILLE
502	MILTON	MILTON
502	MOUNT EDEN	MOUNT EDEN
502	MTWASHIGTN	MOUNT WASHINGTON
502	NEW HAVEN	NEW HAVEN
502	NEWLIBERTY	NEW LIBERTY
502	OWENTON	OWENTON
502	PORT ROYAL	PORT ROYAL
502	ROSETRRACE	ROSE TERRACE
502	SADIEVILLE	SADIEVILLE
502	SHELBYVL	SHELBYVILLE
502	SHEPHEHSV	SHEPHERDSVILLE
502	SIMPSONVL	SIMPSONVILLE
502	STAMPNGRND	STAMPING GROUND
502	SULPHUR	SULPHUR

KY 502 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
502	TAYLORSVL	TAYLORSVILLE
502	WADDY	WADDY
502	WEST POINT	WEST POINT
502	ZONETON	ZONETON

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	ADAIRVILLE	ADAIRVILLE
270/364	ARLINGTON	ARLINGTON
270/364	AUBURN	AUBURN
270/364	AURORA	AURORA
270/364	BANDANA	BANDANA
270/364	BARDWELL	BARDWELL
270/364	BARLOW	BARLOW
270/364	BATTLETOWN	BATTLETOWN
270/364	BEAVER DAM	BEAVER DAM
270/364	BEE SPRING	BEE SPRING
270/364	BENTON	BENTON
270/364	BESSIEBEND	BESSIE BEND
270/364	BLUFF SPG	BLUFF SPRINGS
270/364	BONNIEVL	BONNIEVILLE
270/364	BOWLNGGREN	BOWLING GREEN
270/364	BRADFODSVL	BRADFORDSVILLE
270/364	BRANDENBG	BRANDENBURG
270/364	BREMEN	BREMEN
270/364	BRKSVL RUL	BURKESVILLE RURAL
270/364	BROWNSVL	BROWNSVILLE
270/364	BUFFALO	BUFFALO
270/364	BURKESVL	BURKESVILLE
270/364	CADIZ	CADIZ
270/364	CALHOUN	CALHOUN
270/364	CALVERT CY	CALVERT CITY
270/364	CAMPBELSVL	CAMPBELLSVILLE
270/364	CANEYVILLE	CANEYVILLE
270/364	CANMER	CANMER
270/364	CANTON	CANTON
270/364	CAVE CITY	CAVE CITY
270/364	CAYCE	CAYCE

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	CECILIA	CECILIA
270/364	CENTER	CENTER
270/364	CENTERTOWN	CENTERTOWN
270/364	CENTRAL CY	CENTRAL CITY
270/364	CLARKSON	CLARKSON
270/364	CLAY	CLAY
270/364	CLINTON	CLINTON
270/364	CLOVERPORT	CLOVERPORT
270/364	COLUMBIA	COLUMBIA
270/364	COLUMBUS	COLUMBUS
270/364	CORYDON	CORYDON
270/364	CROFTON	CROFTON
270/364	CUNNINGHAM	CUNNINGHAM
270/364	CUSTER	CUSTER
270/364	DAWSON SPG	DAWSON SPRINGS
270/364	DIXON	DIXON
270/364	DRAKESBORO	DRAKESBORO
270/364	DUNMOR	DUNMOR
270/364	EARLINGTON	EARLINGTON
270/364	EDDYVILLE	EDDYVILLE
270/364	EDMONTON	EDMONTON
270/364	ELIZABHTN	ELIZABETHTOWN
270/364	ELKTON	ELKTON
270/364	ENSOR	ENSOR
270/364	FAIRDEALNG	FAIRDEALING
270/364	FAIRPLAY	FAIRPLAY
270/364	FANCY FARM	FANCY FARM
270/364	FARMINGTON	FARMINGTON
270/364	FOLSOMDALE	FOLSOMDALE
270/364	FORDSVILLE	FORDSVILLE
270/364	FOUNTANRUN	FOUNTAIN RUN

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	FRANKLIN	FRANKLIN
270/364	FREDONIA	FREDONIA
270/364	FULTON	FULTON
270/364	GAGE	GAGE
270/364	GAMALIEL	GAMALIEL
270/364	GILBERTSVL	GILBERTSVILLE
270/364	GLASGOW	GLASGOW
270/364	GLASGWRURL	GLASGOW RURAL
270/364	GRACEY	GRACEY
270/364	GREENSBURG	GREENSBURG
270/364	GREENVILLE	GREENVILLE
270/364	GUTHRIE	GUTHRIE
270/364	HABIT	HABIT
270/364	HANSON	HANSON
270/364	HARDIN	HARDIN
270/364	HARDINSBG	HARDINSBURG
270/364	HARTFORD	HARTFORD
270/364	HAWESVILLE	HAWESVILLE
270/364	HAZEL	HAZEL
270/364	HEATH	HEATH
270/364	HEBBARDSVL	HEBBARDSVILLE
270/364	HENDERSON	HENDERSON
270/364	HICKMAN	HICKMAN
270/364	HISEVILLE	HISEVILLE
270/364	HODGENVL	HODGENVILLE
270/364	HOPKINSVL	HOPKINSVILLE
270/364	HORSE CAVE	HORSE CAVE
270/364	IRVINGTON	IRVINGTON
270/364	ISLAND	ISLAND
270/364	JAMESTOWN	JAMESTOWN
270/364	JORDAN	JORDAN

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	KEVIL	KEVIL
270/364	KIRKSEY	KIRKSEY
270/364	LA CENTER	LA CENTER
270/364	LA FAYETTE	LA FAYETTE
270/364	LEBANON	LEBANON
270/364	LEITCHFLD	LEITCHFIELD
270/364	LEWISBRG	LEWISBURG (LOGAN)
270/364	LEWISPORT	LEWISPORT
270/364	LIVERMORE	LIVERMORE
270/364	LOGANSPORT	LOGANSPORT
270/364	LORETTO	LORETTO
270/364	LOWES	LOWES
270/364	LUCAS	LUCAS
270/364	LYNN GROVE	LYNN GROVE
270/364	LYNNVILLE	LYNNVILLE
270/364	MACEO	MACEO
270/364	MADISONVL	MADISONVILLE
270/364	MAGNOLIA	MAGNOLIA
270/364	MAMOTHCAVE	MAMMOTH CAVE
270/364	MARION	MARION
270/364	MAYFIELD	MAYFIELD
270/364	MCDANIELS	MCDANIELS
270/364	MILBURN	MILBURN
270/364	MORGANFLD	MORGANFIELD
270/364	MORGANTOWN	MORGANTOWN
270/364	MORTONSGAP	MORTONS GAP
270/364	MUNFORDVL	MUNFORDVILLE
270/364	MURRAY	MURRAY
270/364	NEBO	NEBO
270/364	NEWCONCORD	NEW CONCORD
270/364	NO GARRETT	NORTH GARRETT

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	NORTONVL	NORTONVILLE
270/364	OAK GROVE	OAK GROVE
270/364	OWENSBORO	OWENSBORO
270/364	PADUCAH	PADUCAH
270/364	PANTHER	PANTHER
270/364	PARK CITY	PARK CITY
270/364	PAYNEVILLE	PAYNEVILLE
270/364	PEMBROKE	PEMBROKE
270/364	PLEASATRDG	PLEASANT RIDGE
270/364	PRINCETON	PRINCETON
270/364	PROVIDENCE	PROVIDENCE
270/364	RADCLIFF	RADCLIFF
270/364	ROBARDS	ROBARDS
270/364	ROCHESTER	ROCHESTER
270/364	RUSSELLSPG	RUSSELL SPRINGS
270/364	RUSSELLVL	RUSSELLVILLE
270/364	SACRAMENTO	SACRAMENTO
270/364	SALEM	SALEM
270/364	SCOTTSVL	SCOTTSVILLE
270/364	SCTSVL RUL	SCOTTSVILLE RURAL
270/364	SEBREE	SEBREE
270/364	SEDALIA	SEDALIA
270/364	SHARON GRV	SHARON GROVE
270/364	SLAUGHTERS	SLAUGHTERS
270/364	SMITHLAND	SMITHLAND
270/364	SMITHS GRV	SMITHS GROVE
270/364	SO HARDIN	SOUTH HARDIN
270/364	SORGHO	SORGHO
270/364	ST CHARLES	ST CHARLES
270/364	STANLEY	STANLEY
270/364	STURGIS	STURGIS

KY 270/364 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
270/364	SUMMERSHAD	SUMMER SHADE
270/364	SYMSONIA	SYMSONIA
270/364	TEMPLEHILL	TEMPLE HILL
270/364	TOMPKINSVL	TOMPKINSVILLE
270/364	TRENTON	TRENTON
270/364	UNIONTOWN	UNIONTOWN
270/364	UTICA	UTICA
270/364	VINE GROVE	VINE GROVE
270/364	W LOUISVL	WEST LOUISVILLE
270/364	WATER VLY	WATER VALLEY
270/364	WESTPLAINS	WEST PLAINS
270/364	WHITESVL	WHITESVILLE
270/364	WICKLIFFE	WICKLIFFE
270/364	WINGO	WINGO
270/364	WOODBURN	WOODBURN

KY 606 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
606	ALBANY	ALBANY
606	ALLEN	ALLEN
606	ANNVILLE	ANNVILLE
606	ASHLAND	ASHLAND
606	AUGUSTA	AUGUSTA
606	BARBOURVL	BARBOURVILLE
606	BEATTYVL	BEATTYVILLE
606	BENHAMLNCH	BENHAM LYNCH
606	BLAINE	BLAINE
606	BLEDSONE	BLEDSONE
606	BOONEVILLE	BOONEVILLE
606	BRODHEAD	BRODHEAD
606	BROOKSVL	BROOKSVILLE
606	BUCKHORN	BUCKHORN
606	BURNSIDE	BURNSIDE
606	CAMPTON	CAMPTON
606	CANOE	CANOE
606	CATLETTSBG	CATLETTSBURG
606	CHAPMAN	CHAPMAN
606	CODY	CODY
606	CORBIN	CORBIN
606	CRAB ORCH	CRAB ORCHARD
606	CUMBERLAND	CUMBERLAND
606	DOVER	DOVER
606	DWARF	DWARF
606	EBERNSTADT	EAST BERNSTADT
606	ELKHORN CY	ELKHORN CITY
606	EUBANK	EUBANK
606	EVARTS	EVARTS
606	EWING	EWING
606	EZEL	EZEL

KY 606 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
606	FALLSBURG	FALLSBURG
606	FAUBUSH	FAUBUSH
606	FEDSCREEK	FEDSCREEK
606	FERNLEAF	FERNLEAF
606	FISTY	FISTY
606	FLAT GAP	FLAT GAP
606	FLAT LICK	FLAT LICK
606	FLEMINGSBG	FLEMINGSBURG
606	FREEBURN	FREEBURN
606	FRENCHBURG	FRENCHBURG
606	GARRISON	GARRISON
606	GERMANTOWN	GERMANTOWN
606	GRAYSON	GRAYSON
606	GREENUP	GREENUP
606	GRETHEL	GRETHEL
606	HARLAN	HARLAN
606	HAROLD	HAROLD
606	HAZARD	HAZARD
606	HAZELGREEN	HAZEL GREEN
606	HILLSBORO	HILLSBORO
606	HINDMAN	HINDMAN
606	HUSTONVL	HUSTONVILLE
606	HYDEN	HYDEN
606	INEZ	INEZ
606	IRVINE	IRVINE
606	JACKSON	JACKSON
606	JELLICO	JELLICO
606	JENKINS	JENKINS
606	JEPHTHA	JEPHTHA
606	JOHNSVILLE	JOHNSVILLE
606	LEATHERWD	LEATHERWOOD

KY 606 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
606	LEWISBURG	LEWISBURG (MASON)
606	LIBERTY	LIBERTY
606	LIVINGSTON	LIVINGSTON
606	LONDON	LONDON
606	LOUISA	LOUISA
606	MANCHESTER	MANCHESTER
606	MARTIN	MARTIN
606	MAYS LICK	MAYS LICK
606	MAYSVILLE	MAYSVILLE
606	MCCARR	MCCARR
606	MCDOWELL	MCDOWELL
606	MCKEE	MCKEE
606	MEADS	MEADS
606	MIDDLESBO	MIDDLESBORO
606	MONTICELLO	MONTICELLO
606	MOREHEAD	MOREHEAD
606	MOUSIE	MOUSIE
606	MT OLIVET	MOUNT OLIVET
606	MT VERNON	MOUNT VERNON
606	NANCY	NANCY
606	NEON	NEON
606	OLIVE HILL	OLIVE HILL
606	ONEIDA	ONEIDA
606	OWINGSVL	OWINGSVILLE
606	PAINTSVL	PAINTSVILLE
606	PIKEVILLE	PIKEVILLE
606	PINE KNOT	PINE KNOT
606	PINEVILLE	PINEVILLE
606	PIPPAPASSS	PIPPA PASSES
606	PRESTONSBG	PRESTONSBURG
606	ROYALTON	ROYALTON

KY 606 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
606	RUSSELL	RUSSELL
606	SALT LICK	SALT LICK
606	SALYERSVL	SALYERSVILLE
606	SANDGAP	SANDGAP
606	SANDY HOOK	SANDY HOOK
606	SCIENCE HL	SCIENCE HILL
606	SHARPSBURG	SHARPSBURG
606	SHOPVILLE	SHOPVILLE
606	SOMERSET	SOMERSET
606	SOUTHSHORE	SOUTH SHORE
606	SOWILLIMSN	SOUTH WILLIAMSON
606	STAFORDSVL	STAFFORDSVILLE
606	STANFORD	STANFORD
606	STANTON	STANTON
606	STINNETT	STINNETT
606	STNSWHLYCY	STEARNS WHITLEY CITY
606	STONE	STONE
606	TOLLESBORO	TOLLESBORO
606	TOPMOST	TOPMOST
606	VANCEBURG	VANCEBURG
606	VICCO	VICCO
606	VIRGIE	VIRGIE
606	W LIBERTY	WEST LIBERTY
606	WALLINSCRK	WALLINS CREEK
606	WARFIELD	WARFIELD
606	WASHINGTON	WASHINGTON
606	WAYLAND	WAYLAND
606	WHEELWRIHT	WHEELWRIGHT
606	WHITE LILY	WHITE LILY
606	WHITESBURG	WHITESBURG
606	WILLIAMSBG	WILLIAMSBURG

KY 606 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
606	WOOTON	WOOTON

KY 859 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
859	ALEXANDRIA	ALEXANDRIA
859	BEREA	BEREA
859	BOONE	BOONE
859	BRYANTSVL	BRYANTSVILLE
859	BURGIN	BURGIN
859	BUTLER	BUTLER
859	CARLISLE	CARLISLE
859	CORNISHVL	CORNISHVILLE
859	COVINGTON	COVINGTON
859	CYNTHIANA	CYNTHIANA
859	DANVILLE	DANVILLE
859	FALMOUTH	FALMOUTH
859	FORD	FORD
859	GLENCOE	GLENCOE
859	HARRODSBG	HARRODSBURG
859	INDEPNDNCE	INDEPENDENCE
859	JUNCTIONCY	JUNCTION CITY
859	KIRKSVILLE	KIRKSVILLE
859	LANCASTER	LANCASTER
859	LEXINGTON	LEXINGTON
859	LITTLEROCK	LITTLE ROCK
859	MACKVILLE	MACKVILLE
859	MIDWAY	MIDWAY
859	MILLERBURG	MILLERSBURG
859	MOORESVL	MOORESVILLE
859	MTSTERLING	MOUNT STERLING
859	NICHOLASVL	NICHOLASVILLE
859	NOMIDDLETN	NORTH MIDDLETOWN
859	PAINT LICK	PAINT LICK
859	PARIS	PARIS
859	PERRYVILLE	PERRYVILLE

KY 859 Rate Center List		
NPA	Abbreviated Rate Center	Rate Center Full Name
859	RICHMOND	RICHMOND
859	SALVISA	SALVISA
859	SPRINGFLD	SPRINGFIELD
859	VERSAILLES	VERSAILLES
859	WACO	WACO
859	WALTON	WALTON
859	WARSAW	WARSAW
859	WILLIAMSTN	WILLIAMSTOWN
859	WILLISBURG	WILLISBURG
859	WILMORE	WILMORE
859	WINCHESTER	WINCHESTER

Kentucky 502 CO Code Holders	
Company	OCN
AERO COMMUNICATIONS, LLC - KY	3786
AIRESPRING, INC.	996H
AMERICAN MESSAGING SERVICES, LLC	9748
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - KY	987E
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BRANDENBURG TELECOM, LLC - KY	5672
CALLWORKS CORPORATION	475J
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KY	6500
CENTURYLINK COMMUNICATIONS, LLC	508J
COMMIO, LLC	939H
CORETEL KENTUCKY, INC. - KY	480F
CSC WIRELESS, LLC	425J
DISH WIRELESS, LLC	490J
EON TELECOM, INC.	839J
EXIANT COMMUNICATIONS LLC	114J
FRACTEL, LLC	965H
HD CARRIER LLC	321J
INTRADO COMMUNICATIONS, LLC	861C
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - KY	4369
LEVEL 3 TELECOM OF KENTUCKY, LLC - KY	7260
MCC TELEPHONY OF THE SOUTH, LLC - KY	781F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
METROPCS, INC.	5562
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - KY	896E
PAETEC ITEL, LLC	829J
PEERLESS NETWORK OF KENTUCKY, LLC - KY	035H
POWERTEL KENTUCKY LICENSES, INC.	365C
RAM TECHNOLOGIES, INC. - KY	6595
RCLEC, INC.	156J
SKYE TELECOM LLC DBA SKYETEL	622J
STRATUS NETWORKS	495J

TELEPORT COMMUNICATIONS AMERICA, LLC - KY	8406
TELNYX LLC	073H
TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY	698F
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J
USA MOBILITY WIRELESS, INC.	6630
VONAGE AMERICA LLC	197D
WADDELL SOLUTIONS GROUP LLC	742J
WIN.NET TELECOMMUNICATIONS, INC. - KY	3583
WINDSTREAM KENTUCKY WEST, INC.	0402
WINDSTREAM NUVOX, INC.	8660
YMAX COMMUNICATIONS CORP. - KY	355E

Kentucky 502 Block holders with No CO Codes Assigned

Company	OCN
TERRA NOVA TELECOM INC.	145J

Kentucky 270/364 CO Code Holders	
Company	OCN
AERO COMMUNICATIONS, LLC - KY	3786
AT&T - LOCAL	7421
AT&T CORP.	516C
BALLARD RURAL TEL. COOP. CORP., INC.	0396
BANDWIDTH.COM CLEC, LLC - KY	987E
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
BRANDENBURG TEL. CO.	0398
BRANDENBURG TELECOM, LLC - KY	5672
CALLWORKS CORPORATION	475J
CEBRIDGE TELECOM KY, LLC DBA SUDDENLINK COMM	238H
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KY	6500
CENTURYLINK COMMUNICATIONS, LLC	508J
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
CORETEL KENTUCKY, INC. - KY	480F
CSC WIRELESS, LLC	425J
CUMBERLAND CELLULAR, LLC	330E
DIALOG TELECOMMUNICATIONS, INC. - KY	292D
DISH WIRELESS, LLC	490J
DUO COUNTY TEL. COOP., INC.	0401
EON TELECOM, INC.	839J
E-TEL, LLC - KY	4240
E-TEL, LLC - KY	5196
EXIANT COMMUNICATIONS LLC	114J
FRACTEL, LLC	965H
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - KY	4369
LEWISPORT TEL. CO., INC.	0412
LOGAN TEL. COOP., INC.	0413
MCC TELEPHONY OF THE SOUTH, LLC - KY	781F
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
METROPCS, INC.	5562
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NORTH CENTRAL COMMUNICATIONS, INC. - KY	9590
NORTH CENTRAL TEL. COOP.	4001
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H

ONVOY, LLC - KY	896E
PAETEC ITEL, LLC	829J
POWERTEL KENTUCKY LICENSES, INC.	365C
POWERTEL NASHVILLE LICENSES, INC.	7476
SALEM TEL. CO.	0417
SKYE TELECOM LLC DBA SKYETEL	622J
SO CENTRAL RURAL TELECOMM COOPERATIVE, INC.	0418
SOUTH CENTRAL TELCOM, LLC	5620
TELEPORT COMMUNICATIONS AMERICA, LLC - KY	8406
TELNYX LLC	073H
TERRA NOVA TELECOM INC.	145J
TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY	698F
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J
USA MOBILITY WIRELESS, INC.	6630
VELOCITY NETWORKS OF KENTUCKY, INC. - KY	2335
VOIP INNOVATIONS, LLC	597F
VONAGE AMERICA LLC	197D
WEST KENTUCKY RURAL TEL	0421
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORAT	584J
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	9690
WINDSTREAM KENTUCKY EAST, INC. - LONDON	9691
YMAX COMMUNICATIONS CORP. - KY	355E

Kentucky 270/364 Block holders with No CO Codes Assigned

Company	OCN
PEERLESS NETWORK OF KENTUCKY, LLC - KY	035H
MCC TELEPHONY LLC	593K
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - KY	6161

Kentucky 606 CO Code Holders	
Company	OCN
ARMSTRONG TELECOMMUNICATIONS, INC. - KY	419C
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - KY	987E
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
CEBRIDGE TELECOM KY, LLC DBA SUDDENLINK COMM	238H
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KY	6500
CELLULAR SERVICES, LLC - KY	193F
COMMIO, LLC	939H
CSC WIRELESS, LLC	425J
EAST KENTUCKY NETWRK, LLC DBA APPALACHIAN WIRELESS	6940
FIBERNET, LLC - KY	732E
FOOTHILLS RURAL TEL. COOP. CORP.	0406
FRACTEL, LLC	965H
GEARHEART COMM. CO., INC. DBA COALFIELDS TEL. CO.	0408
HIGHLAND TEL. COOP, INC.	4002
INTEGRATED PATH COMMUNICATIONS - KENTUCKY, LLC-KY	847H
INTER MOUNTAIN CABLE DBA MIKROTEC COMMUNICATIONS	2623
IP HORIZON LLC	515J
LESLIE COUNTY TEL. CO.	0411
LEVEL 3 COMMUNICATIONS, LLC - KY	4369
MCC TELEPHONY LLC	593K
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
METROPCS, INC.	5562
MOUNTAIN RURAL TEL. COOP. CORP., INC.	0414
NEW CINGULAR WIRELESS PCS, LLC - DC	4036
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NUSO, LLC	478J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - KY	896E
PAETEC ITEL, LLC	829J
PEOPLES RURAL TEL. COOP. CORP.	0415
PEOPLES TELECOM, LLC	489H
POWERTEL KENTUCKY LICENSES, INC.	365C
SKYE TELECOM LLC DBA SKYETEL	622J
TELEPORT COMMUNICATIONS AMERICA, LLC - KY	8406
TELNYX LLC	073H
THACKER/GRIGSBY TEL. CO.	0419
TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY	698F
TV SERVICE, INC. - KY	419E

WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	9690
WINDSTREAM KENTUCKY EAST, INC. - LONDON	9691

Kentucky 606 Block holders with No CO Codes Assigned

Company	OCN
TERRA NOVA TELECOM INC.	145J
VONAGE AMERICA LLC	197D
YMAX COMMUNICATIONS CORP. - KY	355E
DISH WIRELESS, LLC	490J
LEVEL 3 TELECOM OF KENTUCKY, LLC - KY	7260

Kentucky 859 CO Code Holders	
Company	OCN
AERO COMMUNICATIONS, LLC - KY	3786
AT&T - LOCAL	7421
AT&T CORP.	516C
BANDWIDTH.COM CLEC, LLC - KY	987E
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419
CALLWORKS CORPORATION	475J
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KY	6500
CINCINNATI BELL	9348
COMCAST IP PHONE, LLC	318J
COMMIO, LLC	939H
DISH WIRELESS, LLC	490J
EXIANT COMMUNICATIONS LLC	114J
FRACTEL, LLC	965H
GLOBAL CROSSING LOCAL SERVICES, INC. - KY	0021
INVOXIO INCORPORATED	158H
IP HORIZON LLC	515J
LEVEL 3 COMMUNICATIONS, LLC - KY	4369
LEVEL 3 TELECOM OF KENTUCKY, LLC - KY	7260
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - KY	6161
METROPCS, INC.	5562
NEW CINGULAR WIRELESS PCS, LLC - GA	6214
NEW CINGULAR WIRELESS PCS, LLC - IL	6534
NUSO, LLC	478J
NUSO, LLC	551G
NUSO, LLC	732J
ONVOY SPECTRUM, LLC	624H
ONVOY, LLC - KY	896E
PAETEC ITEL, LLC	829J
PEERLESS NETWORK OF KENTUCKY, LLC - KY	035H
POWERTEL KENTUCKY LICENSES, INC.	365C
SKYE TELECOM LLC DBA SKYETEL	622J
STRATUS NETWORKS	495J
TELEPORT COMMUNICATIONS AMERICA, LLC - KY	8406
TELNYX LLC	073H
TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY	698F
T-MOBILE USA, INC.	6529
TON80 COMMUNICATIONS, LLC	516J
TWILIO INTERNATIONAL, INC.	506J

USA MOBILITY WIRELESS, INC.	6630
VONAGE AMERICA LLC	197D
WADDELL SOLUTIONS GROUP LLC	742J
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	9690
YMAX COMMUNICATIONS CORP. - KY	355E

Kentucky 859 Block holders with No CO Codes Assigned

Company	OCN
TERRA NOVA TELECOM INC.	145J
HD CARRIER LLC	321J
CENTURYLINK COMMUNICATIONS, LLC	508J
CBTS TECHNOLOGY SOLUTIONS LLC - KY	593F
CITYNET KENTUCKY, LLC - KY	779B

Central Office Code Summary

<u>NPA</u>	<u>502</u>	<u>270</u>	<u>364</u>			
Assigned NXXs	708	783	66			
Reserved NXXs	0	0	0			
Unavailable NXXs	21	14	14			
Available NXXs	71	3	720			
Total	800	800	800			
<u>Codes Assignment History</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
502 NPA	8	10	31	20	24	16*
270 NPA	4	3	0	3	2	1*
364 NPA	10	3	20	15	7	7*
*As of August 12, 2024						
Exhaust:	Based on the April 2024 NRUF and NPA Exhaust Analysis, the 502 NPA is projected to exhaust in 3Q2027 and the 270/364 NPA is projected to exhaust in 3Q2080.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS

ST/NPA:	KY 502	KY 270/364
MEETING DATE:	9/10/2024	9/10/2024
RATE CENTERS		
	-----	-----
# Total	35	170
# Mandatory	26	159
# Mandatory-Single Service Providers (M*)	0	11
# Optional	9	0
# Excluded	0	0
BLOCKS ASSIGNED		
# Total	364	239
<i>(For time period 9/1/23 - 8/12/24)</i>		
BLOCKS AVAILABLE		
#Total	239	1510
<i>(As of preparation date: 8/12/24)</i>		
CODES ASSIGNED		
# Total	30	8
# for Pool Replenishment	10	6
# for Dedicated Customers	2	0
# for LRNs	18	2
<i>(For time period 9/01/23 - 8/12/24)</i>		
CODES FORECASTED		
# Total	10	0
# for Pool Replenishment and Dedicated Customers	10	0
# for LRNs	0	0
<i>(For the next twelve months as of: 8/12/24)</i>		

Central Office Code Summary

<u>NPA</u>	<u>502</u>	<u>270</u>	<u>364</u>	<u>606</u>	<u>859</u>	
Assigned NXXs	710	783	66	620	555	
Reserved NXXs	0	0	0	0	0	
Unavailable NXXs	21	14	14	29	14	
Available NXXs	69	3	720	151	231	
Total	800	800	800	800	800	
<u>Codes Assignment History</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
502 NPA	8	10	31	20	24	18*
270 NPA	4	3	0	3	2	1*
364 NPA	10	3	20	15	7	7*
606 NPA	6	9	10	19	14	18*
859 NPA	6	4	14	12	13	6*
*As of September 6, 2024						
Exhaust:	Based on the April 2024 NRUF and NPA Exhaust Analysis, the 502 NPA is projected to exhaust in 3Q2027, the 270/364 NPA is projected to exhaust in 3Q2080, the 606 NPA is projected to exhaust in 2Q2034, and the 859 NPA is projected to exhaust in 4Q2045.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS

ST/NPA:	KY 502	KY 270/364	KY 606	KY 859
MEETING DATE:	9/10/2024	9/10/2024	9/10/2024	9/10/2024
RATE CENTERS				
<i># Total</i>	35	170	125	42
<i># Mandatory</i>	26	159	4	10
<i># Mandatory-Single Service Providers (M*)</i>	0	11	0	0
<i># Optional</i>	9	0	105	32
<i># Excluded</i>	0	0	16	0
BLOCKS ASSIGNED				
<i># Total</i>	386	244	299	175
<i>(For time period 9/1/23 - 9/06/24)</i>				
BLOCKS AVAILABLE				
<i>#Total</i>	238	1504	869	529
<i>(As of preparation date:9/06/24)</i>				
CODES ASSIGNED				
<i># Total</i>	32	8	20	12
<i># for Pool Replenishment</i>	20	6	18	9
<i># for Dedicated Customers</i>	10	0	0	0
<i># for LRNs</i>	2	2	2	3
<i>(For time period 9/01/23 - 9/06/24)</i>				
CODES FORECASTED				
<i># Total</i>	9	0	14	0
<i># for Pool Replenishment and Dedicated Customers</i>	9	0	14	0
<i># for LRNs</i>	0	0	0	0
<i>(For the next twelve months as of:9/06/24)</i>				

Initial Planning Document
for
Relief of Kentucky 502 NPA
September 10, 2024

North American Numbering Plan Administrator

Cecilia McCabe
NPA Relief Planner

502 NPA Background Information

Relief Planning Background and Assumptions:

The 502 NPA currently serves the north-central region of Kentucky. The 502 NPA was first established in October 1947 and was initially intended for the entire state of Kentucky. The eastern half of the state was assigned area code 606 in 1954. The 502 NPA was split in 1999 creating the 270 NPA which covers the western portion of the state. In 2014, the 270 NPA was overlaid by the 364 NPA.

Cities in the 502 NPA include but are not limited to Louisville, Georgetown, Jeffersontown, Frankfort, St. Matthews, Shively, Shelbyville, Bardstown, Shepherdsville, Lyndon and many other smaller communities. The 502 NPA is bordered on the north and west by the Indiana 812/930 NPAs, to the east by the 859 NPA and to the south by the 270/364 NPAs.

Exhaust Forecast:

The April 2024 Numbering Resource Utilization/Forecast (“NRUF”) and NPA Exhaust Analysis (“April 2024 NRUF Report”), published by NANPA, indicates that the 502 NPA will exhaust during the third quarter of 2027. Relief planning in the 502 NPA is to start in the third quarter of 2024.

The April 2024 NRUF Report also indicates that the 270/364 NPA will exhaust during the third quarter of 2080. This NPA is included in possible alternatives for relief contained in this Initial Planning Document (“IPD”).

On September 6, 2024, a service provider requested that two additional alternatives be added to the IPD. These alternatives include the 606 NPA and 859 NPA. The April 2024 NRUF Report indicates that the 606 NPA will exhaust during the second quarter of 2034 and the 859 NPA will exhaust in the fourth quarter of 2045

CURRENT DIALING PLAN OF THE 502 AND 606 NPA

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) 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)

CURRENT DIALING PLAN OF THE 859 NPA AND 270/364 NPAs

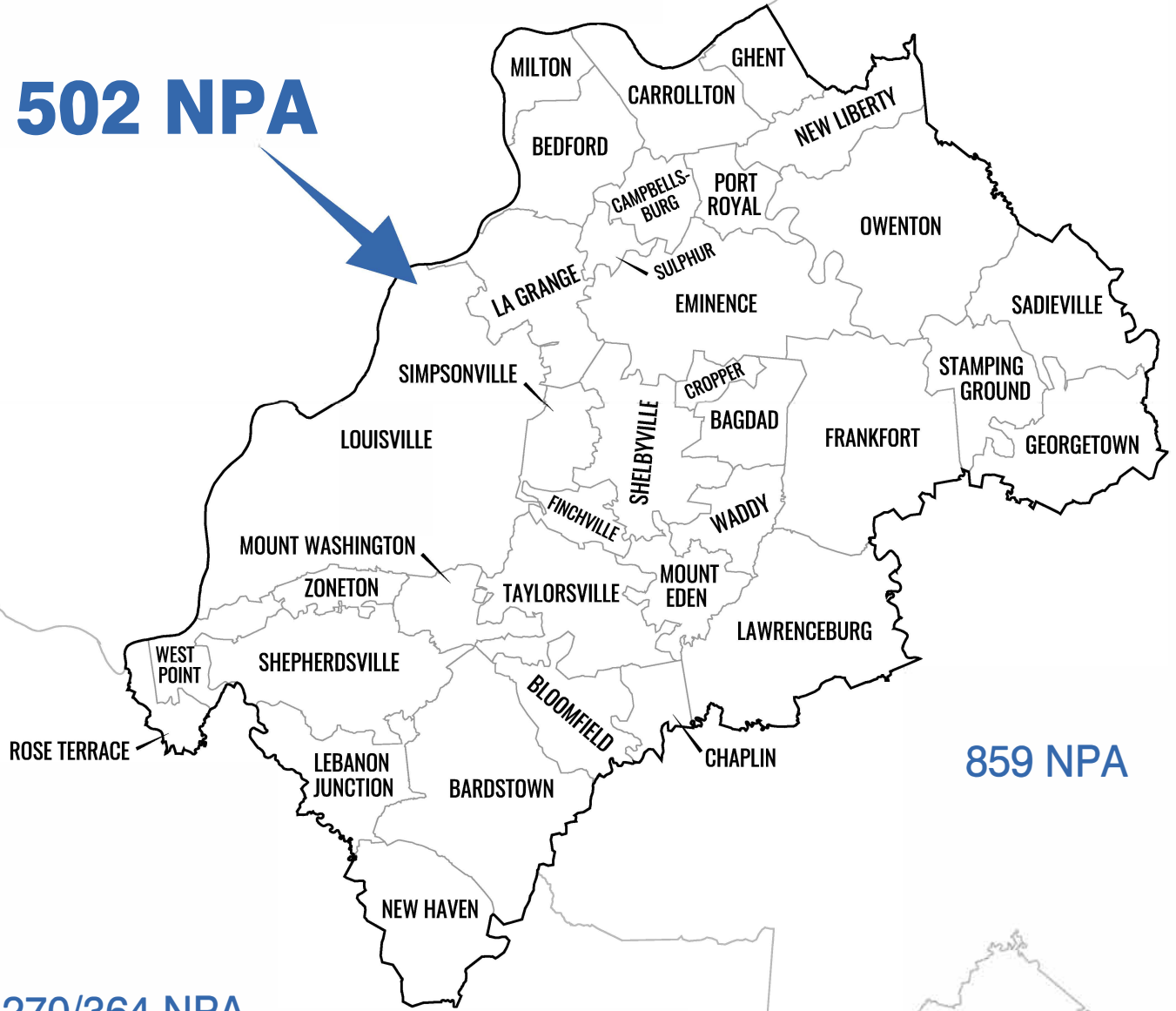
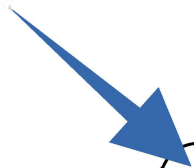
Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+ NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at service provider discretion.

812/930 NPA

I N D I A N A

502 NPA



859 NPA

270/364 NPA



Kentucky 502 NPA Rate Center Map

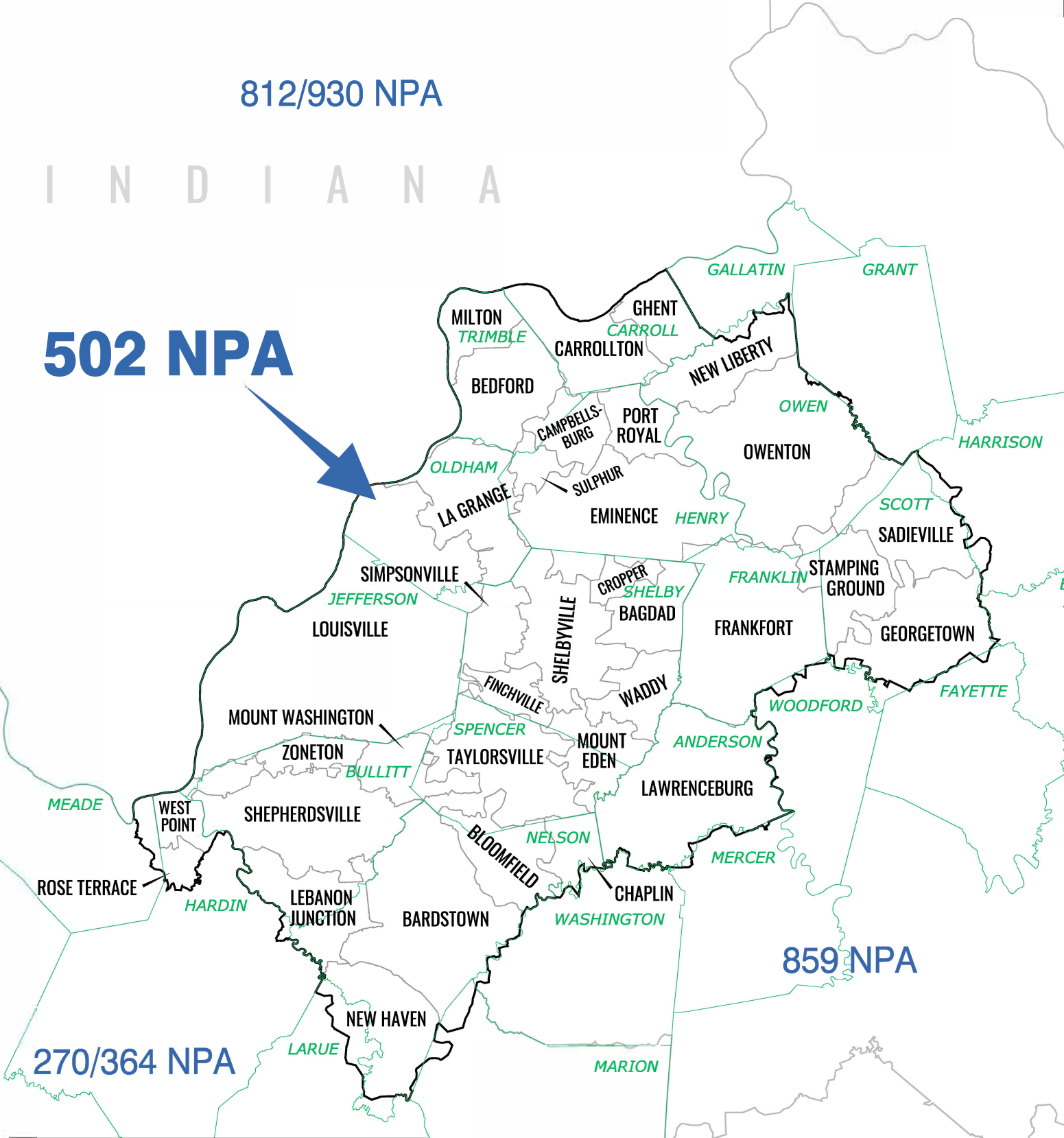
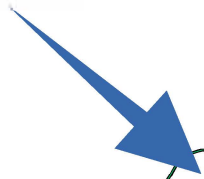
- NPA Boundary
- Rate Center Boundary

April 2024

812/930 NPA




I N D I A N A

502 NPA



[NANPA]
North American Numbering Plan Administrator

Kentucky 502 NPA Rate Center Map

-  NPA Boundary
-  Rate Center Boundary
-  County Boundary

April 2024

KENTUCKY 502 NUMBERING PLAN AREA (NPA) RELIEF ALTERNATIVES

NPA Established: 1947

ALTERNATIVE DESCRIPTIONS

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 502 NPA. Central Office (“CO”) codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 502 NPA have been allocated. Customers would retain their current telephone numbers, and 10-digit local dialing would be required within and between the 502 NPA and the new overlay NPA. There are 35 rate centers in the 502 NPA and at the current assignment rate, the projected life of this alternative would be 30 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 502 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 502 NPA and which side would receive the new NPA. Within each NPA, 7-digit local dialing would be permitted but 10-digit local dialing will be required between the two NPAs. The proposed boundary would split the 502 NPA resulting in the western section of the 502 NPA designated as Area A, and the eastern section designated as Area B, as shown in the Alternative #2 - 502 NPA Split Map. At the current assignment rate, the projected life of this alternative would be:

Area A

Total Rate Centers = Six (6)
Area code life in years = 33

Area B

Total Rate Centers = 29
Area code life in years = 30

ALTERNATIVE #3 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502 and 270/364 NPAs

The boundary between the existing 502 and 270/364 NPAs would be eliminated. The 502 NPA and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit dialing for all calls by all customers within and between the 502 and 270/364 NPAs affected area would be required. The 502 NPA currently has 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing is required for the 270/364 NPA as it is currently in 10-digit local dialing.

Available CO codes in the 502 NPA will be assigned upon request in the 270/364 NPA with the effective date of the new NPA boundary elimination and available 270/364 NPA CO codes could be assigned upon request in the 502 NPA area. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364 NPA supply of CO codes.

The 270/364 NPA has 170 rate centers, and the current projected exhaust is 3Q2080. Eliminating the boundary between the 502 NPA and 270/364 NPA would have 205 combined rate centers. At the current assignment rate, this alternative has a life of 17 years and would

save one NPA from needing to be assigned for this relief project. The 270/364 NPA would have a reduction in the projected exhaust date by 36 years.

The following alternatives were requested from NANPA on September 6, 2024, by an Industry participant:

ALTERNATIVE #4 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502, 606, 859, and 270/364 NPAs

The boundary between the existing 502, 606, 859 and 270/364 NPAs would be eliminated creating one NPA overlay area. The 502, 606, 859 and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit dialing for all calls by all customers within and between the 502, 606, 859 and 270/364 NPAs affected area would be required. The 502 and 606 NPAs currently have 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing is required for the 859 and 270/364 NPAs as they are currently in 10-digit local dialing.

Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 NPA area with the effective date of the new NPA boundary elimination and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPA area. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364, 606, and 859 NPAs supply of CO codes.

The 606 NPA has 125 rate centers, and the current projected exhaust is 2Q2034 and the 859 NPA has 42 rate centers, and the current projected exhaust is 4Q2045. Eliminating the boundary between the 502, 606, 859 and 270/364 NPAs would have 372 combined rate centers.

At the current assignment rate, this alternative has a life of 14 years and therefore does not meet the NPA Code Relief Planning and Notification Guidelines which state: *The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame.*

ALTERNATIVE #5 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502, 606, 859 and 270/364 NPAs WITH THE ADDITION OF A NEW OVERLAY NPA

The boundary between the existing 502, 606, 859 and 270/364 NPAs would be eliminated and a new NPA would be assigned to the new combined NPA area. The 502, 606, 859 and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit dialing for all calls by all customers within and between the 502, 606, 859 and 270/364 and new overlay NPA would be required. The 502 and 606 NPAs currently have 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing is required for the 859 and 270/364 NPAs as they are currently in 10-digit local dialing.

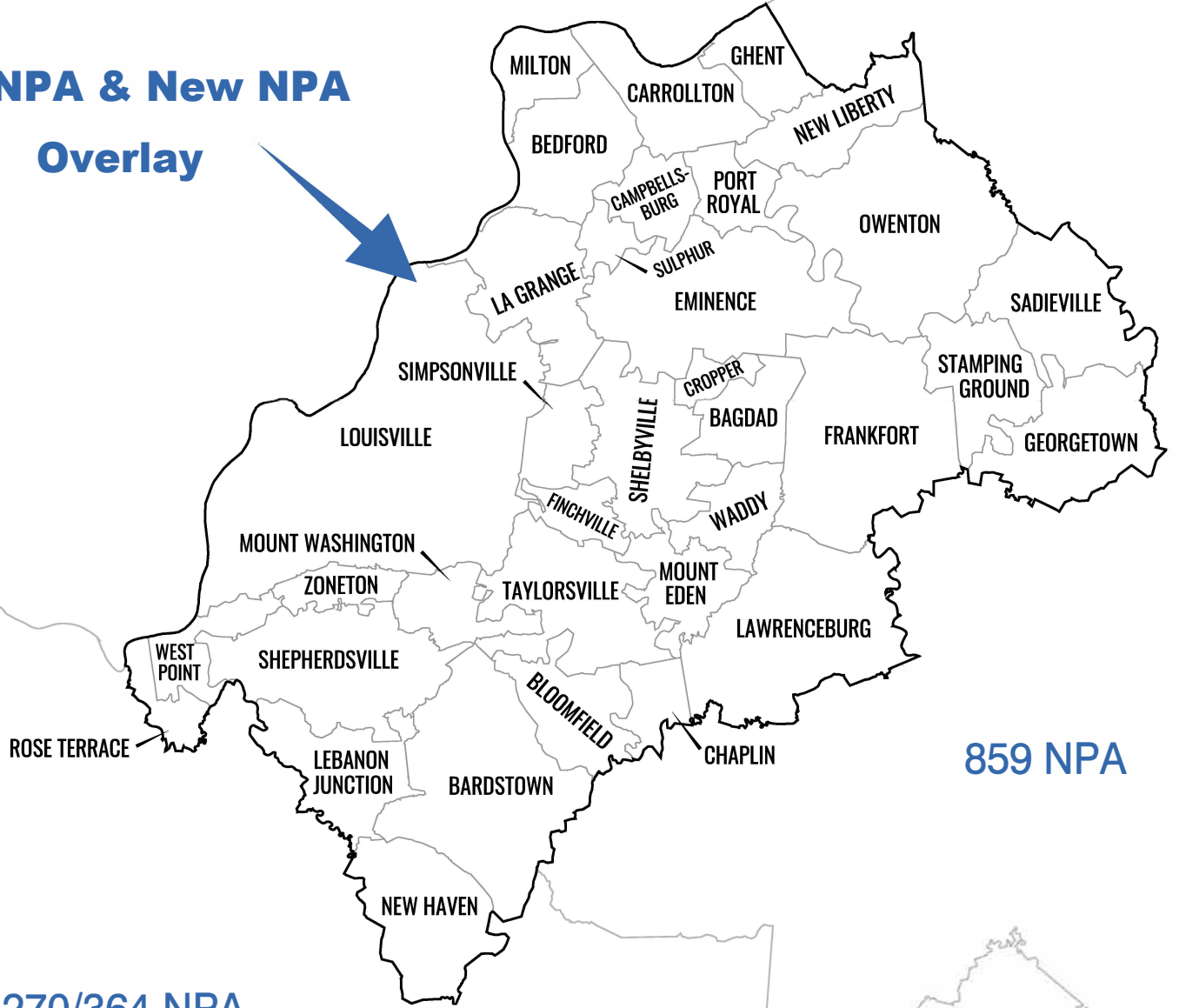
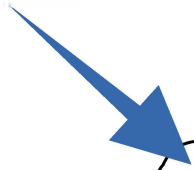
Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 area with the effective date of the new NPA boundary elimination and new overlay NPA and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPA area. CO codes from the new overlay NPA would be assigned only after the existing NPA supply of CO codes in the 502, 606, 859 and 270/364 NPAs are exhausted.

Eliminating the boundary between the 502, 606, 859 and 270/364 NPAs and adding a new overlay NPA would have 372 combined rate centers. At the current assignment rate, this alternative has a life of 26 years. This relief alternative would give the entire state a uniform dialing plan and would increase the projected life of the 606 NPA by nine years, thus delaying NPA relief but would decrease the current projected life of the 859 NPA by two years and the 270/364 NPA by 37 years.

812/930 NPA

I N D I A N A

**502 NPA & New NPA
Overlay**





859 NPA

270/364 NPA



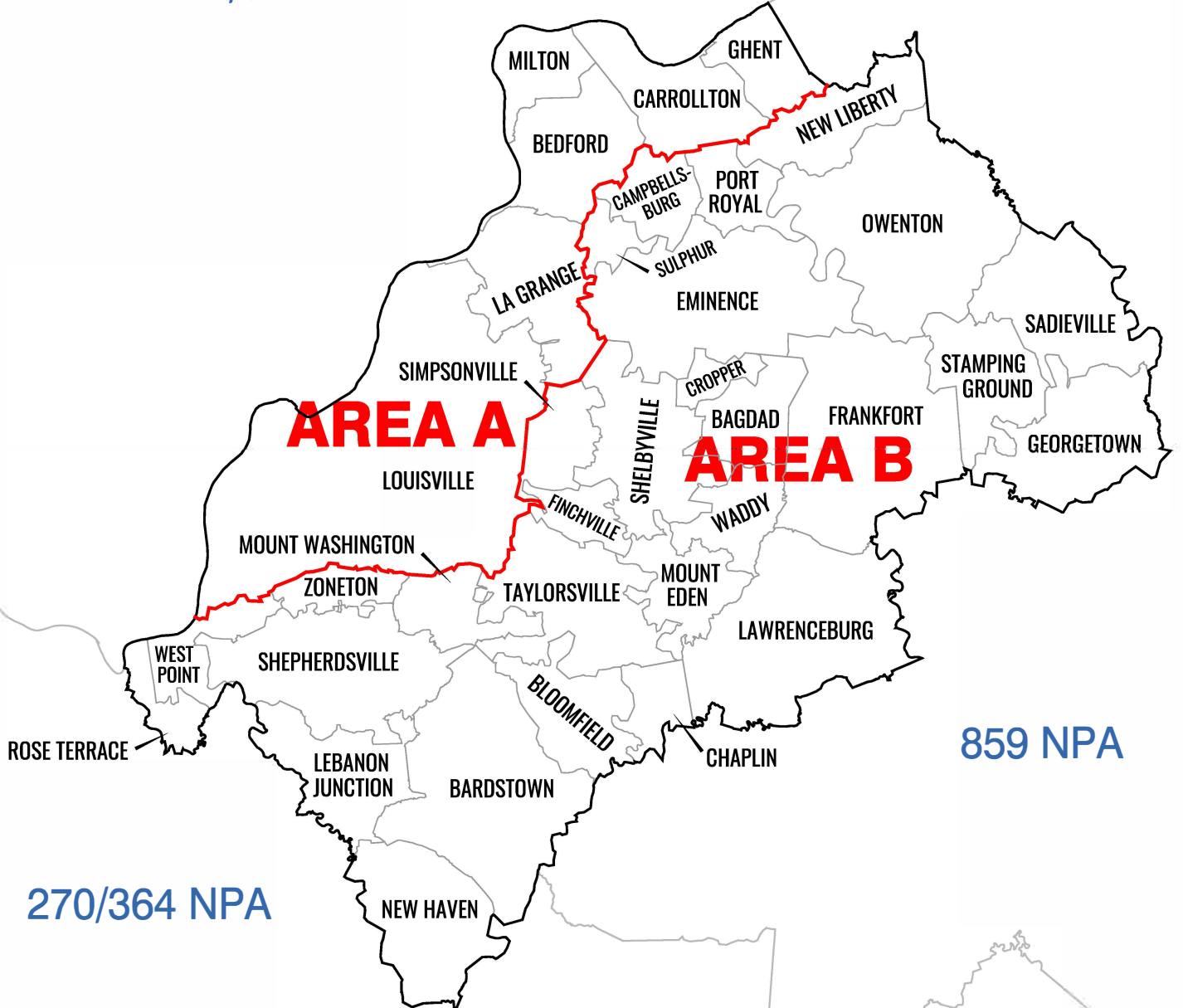
**Kentucky 502 NPA Alternative #1
All-Services Distributed Overlay Map**

-  NPA Boundary
-  Rate Center Boundary

April 2024

I N D I A N A

812/930 NPA



AREA A

AREA B



Alternative #2

Kentucky 502 NPA Split Rate Center Map

- NPA Boundary
- Rate Center Boundary
- Split Rate Boundary Line

June 2024

Kentucky 502 NPA Split – Alternative #2

Area A Rate Centers
BEDFORD
CARROLLTON
GHENT
LA GRANGE
LOUISVILLE
MILTON

Area B Rate Centers
BAGDAD
BARDSTOWN
BLOOMFIELD
CAMPBELLSBURG
CHAPLIN
CROPPER
EMINENCE
FINCHVILLE
FRANKFORT
GEORGETOWN
LAWRENCEBURG
LEBANON JUNCTION
MOUNT EDEN
MOUNT WASHINGTON
NEW HAVEN
NEW LIBERTY
OWENTON
PORT ROYAL
ROSE TERRACE
SADIEVILLE
SHELBYVILLE
SHEPHERDSVILLE
SIMPSONVILLE
STAMPING GROUND
SULPHUR
TAYLORSVILLE
WADDY
WEST POINT
ZONETON

Map page removed

Map page removed

EXHIBIT B



September 26, 2024

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

Subject: Final Minutes of the Initial Planning Meeting for the 502 NPA

Attached are the final minutes from the September 10, 2024, Kentucky 502 NPA initial relief planning meeting. These minutes became final on September 25, 2024.

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

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Jeb Pinney – Kentucky Public Service Commission

**Kentucky 502 Numbering Plan Area (NPA)
Initial Relief Planning Meeting
Via Web Conference
Final Minutes
September 10, 2024**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner – North American Numbering Plan Administrator (“NANPA”), welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Cecilia then reviewed the agenda.

REVIEW CONSENSUS PROCESS

Cecilia stated that the Alliance for Telecommunications Industry Solutions (“ATIS”) approved Industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a “Statement for the Record,” which could be conveyed at any point during the meeting.

NANPA’s ROLE AND RESPONSIBILITIES

Cecilia reviewed NANPA’s role and responsibilities as follows:

- Starts the relief planning process 36 months prior to exhaust of the NPA.
- Distributes the Initial Planning Document (“IPD”) at least four weeks prior to the first industry meeting, which was completed on August 12, 2024. A revised IPD was issued on September 6, 2024, due to a request from a service provider for NANPA to present two (2) additional alternatives.
- Facilitates the meeting, permitting the telecommunications industry of Kentucky (“Industry”) to reach consensus on the relief alternative to be included in the regulatory filing.
- Determines any additional items to include in the relief filing with the Kentucky Public Service Commission (“Commission”) such as the implementation intervals, dialing plan, and compliance with any state-specific requirements.
- Then, NANPA is charged with the responsibility of filing a relief petition on behalf of the Industry with the Commission. Once the Industry comes to consensus on what should be included in the filing, NANPA will complete the regulatory filing as decided by the Industry or as required by the state statute.

REVIEW NPA CODE RELIEF PLANNING AND NOTIFICATION GUIDELINES (“Guidelines”)

Cecilia reviewed pertinent sections of the Guidelines (ATIS-0300061).

Cecilia reviewed Section 5.0, which states:

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

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

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

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

Cecilia noted that there is more than one viable relief option available for the 502 NPA and reviewed section 6.3 of the Guidelines regarding an all-services distributed overlay which states:

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

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

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

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and available NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has a considerable amount of relief life left. This solution has the advantage of

not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs and may require a longer implementation interval.

Cecilia reviewed Section 7.2 of the Guidelines regarding timeframes for NPA relief which states:

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

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

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

Cecilia reviewed the following pertinent documents that were also included in the meeting materials:

- Relief planning meeting aids
- Rate center lists
- Code holder lists

CENTRAL OFFICE (“CO”) CODE STATUS

502 NPA: As of September 6, 2024, the 502 NPA has 710 CO codes assigned, 69 CO codes available for assignment, and 21 unavailable CO codes. There are 52 total service providers in the 502 NPA of which one (1) has only thousands-blocks assigned.

Cecilia stated that because some of the relief options included the 270/364, 606 and 859 NPA, she also reviewed the CO code status for those NPAs.

270 NPA: As of September 6, 2024, the 270 NPA has 783 CO codes assigned, three (3) CO codes available for assignment, and 14 unavailable CO codes.

364 NPA: As of September 6, 2024, the 364 NPA has 66 CO codes assigned, 720 CO codes available for assignment, and 14 unavailable CO codes. There are 65 total service providers in the 270/364 NPA of which three (3) have only thousands-blocks assigned.

606 NPA: As of September 6, 2024, the 606 NPA has 620 CO codes assigned, 151 CO codes available for assignment, and 29 unavailable CO codes. There are 46 total service providers in the 606 NPA of which five (5) have only thousands-blocks assigned.

859 NPA: As of September 6, 2024, the 859 NPA has 555 CO codes assigned, 231 CO codes available for assignment, and 14 unavailable CO codes. There are 49 total service providers in the 859 NPA of which five (5) have only thousands-blocks assigned. (See Attachment #2)

THOUSANDS-BLOCK INFORMATION

Cecilia reported that there are 35 rate centers in the 502 NPA of which 26 are mandatory and nine (9) are optional for pooling. From the period of September 1, 2023 to September 6, 2024, 386 blocks have been assigned and 32 CO codes have been assigned; 20 for pool replenishment, 10 for dedicated customers and two (2) for LRNs. As of September 6, 2024, there are 238 blocks available for assignment to service providers. The forecasted demand for the next twelve months is nine (9) CO codes for pool replenishment and dedicated customers.

Cecilia reported that there are 170 rate centers in the 270/364 NPA of which 159 are mandatory and 11 are mandatory-single service provider for pooling. From the period of September 1, 2023 to September 6, 2024, 244 blocks have been assigned and eight (8) CO codes have been assigned; six (6) for pool replenishment and two (2) for LRNs. As of September 6, 2024, there are 1,504 blocks available for assignment to service providers. There is no forecasted demand for the next twelve months.

Cecilia reported that there are 125 rate centers in the 606 NPA of which four (4) are mandatory, 105 are optional and 16 are excluded for pooling. From the period of September 1, 2023 to September 6, 2024, 299 blocks have been assigned and 20 CO codes have been assigned; 18 for pool replenishment and two (2) for LRNs. As of September 6, 2024, there are 869 blocks available for assignment to service providers. The forecasted demand for the next twelve months is 14 CO codes for pool replenishment and dedicated customers.

Cecilia reported that there are 42 rate centers in the 859 NPA of which 10 are mandatory and 32 are optional for pooling. From the period of September 1, 2023 to September 6, 2024, 175 blocks have been assigned and 12 CO codes have been assigned; nine (9) for pool replenishment and three (3) for LRNs. As of September 6, 2024, there are 529 blocks available for assignment to service providers. There is no forecasted demand for the next twelve months. (See Attachment #3)

A participant asked if any of the unavailable (UA) codes in the 502 and 606 could be made available for assignment. Cecilia stated that these two NPAs are in 7-digit local dialing and there is currently 7-digit local dialing across-NPA boundaries. Therefore, some of the UA CO codes may be released once 10-digit local dialing is in place.

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS

The 502 NPA currently serves the north-central region of Kentucky. The 502 NPA was first established in October 1947 and was initially intended for the entire state of Kentucky. The eastern half of the state was assigned area code 606 in 1954. The 502 NPA was split in 1999 creating the 270 NPA which covers the western portion of the state. In 2014, the 270 NPA was overlaid by the 364 NPA.

Exhaust Forecast:

Cecilia stated that the April 2024 Numbering Resource Utilization/Forecast (“NRUF”) and NPA Exhaust Analysis (“April 2024 NRUF Report”), published by NANPA, indicates that the 502 NPA will exhaust during the third quarter of 2027. Relief planning in the 502 NPA is to start in the third quarter of 2024.

Cecilia stated that because the 270/364, 606 and 859 NPAs are included in possible alternatives for relief contained in this Initial Planning Document (“IPD”), she reviewed those exhaust dates as well. The April 2024 NRUF Report also indicates that the 270/364 NPA will exhaust during the third quarter of 2080, the 606 NPA will exhaust during the second quarter of 2034, and the 859 NPA will exhaust during the fourth quarter of 2045.

Cecilia also reviewed the current dialing plans for the 502, 270/364, 606 and the 859 NPAs, as well as a current map of the 502 NPA and a map showing the counties in the 502 NPA.

REVIEW OF RELIEF PLANNING OPTIONS

Cecilia presented five relief alternatives for the 502 NPA:

ALTERNATIVE #1 – ALL-SERVICES DISTRIBUTED OVERLAY

A new NPA would be assigned to the same geographic area occupied by the existing 502 NPA. Central Office (“CO”) codes in the new NPA will be assigned upon request with the effective date of the new NPA once all assignable CO codes in the 502 NPA have been allocated. Customers would retain their current telephone numbers, and 10-digit local dialing would be required within and between the 502 NPA and the new overlay NPA. There are 35 rate centers in the 502 NPA and at the current assignment rate, the projected life of this alternative would be 30 years.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 502 NPA would become two distinct geographic areas and a new NPA code would be assigned to one of the areas formed by the split. No recommendation is made for which side of the split line would retain the 502 NPA and which side would receive the new NPA. Within each NPA, 7-digit local dialing would be permitted but 10-digit local dialing will be required between the two NPAs. The proposed boundary would split the 502 NPA resulting in the western section of the 502 NPA, designated as Area A, and the eastern section, designated as Area B, as shown in the Alternative #2 - 502 NPA Split Map. At the current assignment rate, the projected life of this alternative would be:

<u>Area A</u>	<u>Area B</u>
Total Rate Centers = Six (6)	Total Rate Centers = 29
Area code life in years = 33	Area code life in years = 30

ALTERNATIVE #3 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502 and 270/364 NPAs

The boundary between the existing 502 and 270/364 NPAs would be eliminated. The 502, and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit local dialing for all calls by all customers within and between the 502, and 270/364 NPAs affected area would be required. The 502 NPA currently has 7-digit local dialing and would need to

transition to 10-digit local dialing. However, no change to the dialing plan is required for the 270/364 NPA as it is currently in 10-digit local dialing.

Available CO codes in the 502 NPA will be assigned upon request in the 270/364 NPA with the effective date of the new NPA boundary elimination and available 270/364 NPA CO codes could be assigned upon request in the 502 NPA area. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364 NPA supply of CO codes.

The 270/364 NPA has 170 rate centers, and the current projected exhaust is 3Q2080. Eliminating the boundary between the 502 NPA and 270/364 NPA would have 205 combined rate centers. At the current assignment rate, this alternative has a life of 17 years, and would save one NPA from needing to be assigned for this relief project. The 270/364 NPA would have a reduction in the projected exhaust date by 36 years.

Cecilia stated that on September 6, 2024, a service provider requested that NANPA prepare two additional alternatives for the Industry to review during this meeting.

ALTERNATIVE #4 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502, 606, 859, and 270/364 NPAs

The boundary between the existing 502, 606, 859 and 270/364 NPAs would be eliminated creating one NPA overlay area. The 502, 606, 859 and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit local dialing for all calls by all customers within and between the 502, 606, 859 and 270/364 NPAs affected area would be required. The 502 and 606 NPAs currently have 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing plan is required for the 859 and 270/364 NPAs as they are currently in 10-digit local dialing.

Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 NPA area with the effective date of the new NPA boundary elimination and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPA area. At exhaust of the 502 NPA, all future CO code assignments will be made from the 270/364, 606, and 859 NPAs supply of CO codes.

The 606 NPA has 125 rate centers, and the current projected exhaust is 2Q2034 and the 859 NPA has 42 rate centers, and the current projected exhaust is 4Q2045. Eliminating the boundary between the 502, 606, 859 and 270/364 NPAs would have 372 combined rate centers.

******At the current assignment rate, this alternative has a life of 14 years and therefore does not meet the NPA Code Relief Planning and Notification Guidelines which state: The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame.******

ALTERNATIVE #5 – NPA BOUNDARY ELIMINATION OVERLAY OF THE 502, 606, 859 and 270/364 NPAs WITH THE ADDITION OF A NEW OVERLAY NPA

The boundary between the existing 502, 606, 859 and 270/364 NPAs would be eliminated and a

new NPA would be assigned to the new combined NPA area. The 502, 606, 859 and 270/364 NPA customers would retain their current telephone numbers; however, 10-digit dialing for all calls by all customers within and between the 502, 606, 859 and 270/364 and new overlay NPA would be required. The 502 and 606 NPAs currently have 7-digit local dialing and would need to transition to 10-digit local dialing. However, no change to the dialing plan is required for the 859 and 270/364 NPAs as they are currently in 10-digit local dialing.

Available CO codes in the 270/364, 606, and 859 NPAs will be assigned upon request in the 502 NPA area with the effective date of the new NPA boundary elimination and new overlay NPA and available 502 NPA CO codes could be assigned upon request in the 270/364, 606, and 859 NPA area. CO codes from the new overlay NPA would be assigned only after the existing NPA supply of CO codes in the 502, 606, 859 and 270/364 NPAs are exhausted.

Eliminating the boundary between the 502, 606, 859 and 270/364 NPAs and adding a new overlay NPA would have 372 combined rate centers. At the current assignment rate, this alternative has a life of 26 years. This relief alternative would give the entire state a uniform dialing plan and would increase the projected life of the 606 NPA by nine years, thus delaying NPA relief but would decrease the current projected life of the 859 NPA by two years and the 270/364 NPA by 37 years.

Cecilia also reviewed the maps for each relief alternative. A map of the entire state was shown for alternatives #4 and #5.

CONSENSUS ON THE RELIEF ALTERNATIVE

The Industry discussed the pros and cons for each relief alternative to determine which alternative would be recommended to the Commission. A proposal was made by a participant to recommend Alternative #1, an All-Services Distributed Overlay, because this alternative impacts fewer customers, is easier to implement, and in addition to the support of the pros and cons listed for each alternative.

A proposal was also made by a participant to recommend Alternative #5, a Boundary Elimination Overlay of the entire state with the addition of a new NPA Overlay, because this alternative establishes a uniform statewide dialing plan as well as eliminating the need to address area code relief in the state for another 23 years.

After additional discussion, additional participants stated they support the recommendation for Alternative #1. One participant stated they did not support Alternative #1 and supports Alternative #5 as a better long-term solution. Consensus was reached to recommend Alternative #1, the All-Services Distributed Overlay. The All-Services Distributed Overlay will be included as the Industry's choice of relief in the petition filed with the Commission.

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

All-Services Distributed Overlay Pros

Alternative #1	
1	All existing customers would retain the 502 area code and would not have to change their telephone number(s)
2	Does not discriminate against customers on different sides of a boundary line as does a geographic split
3	Less customer confusion and easier education process
4	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers
5	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers
6	No need for synchronization of old and new NPAs in NPAC databases as would be required for an NPA split
7	Minimizes call routing issues, especially with ported numbers
8	Easier for service providers to implement from a translations, billing and service order system perspective
9	Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table
10	The Commission would not have to decide which side retains the 502 area code, as would be required for a geographic split
11	Does not split cities or counties into different area codes
12	Does not impact some wireless carriers that have to reprogram handsets manually
13	No technical impacts to number portability, text messaging or multimedia messaging
14	An all-services distributed overlay is simpler to implement from both a technical and customer education perspective compared to an NPA split or boundary elimination overlay
15	Helps move customers toward nationwide 10-digit local dialing
16	Transitioning to 10-digit local dialing will enable CO codes protected for 7-digit dialing routes to be released for assignment
17	Provides longer relief than boundary elimination alternatives #3 and #5.

All-Services Distributed Overlay Cons	
Alternative #1	
1	Consistent with FCC regulations, the relief plan would require 10-digit local dialing for all local calls within and between the 502 NPA and the new overlay NPA
2	Financial costs to add new NPA to signage and printed material where only 7-digit number is shown
3	Customers would have to reprogram any equipment currently programmed to dial 7-digits to dial 10-digits (e.g., alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.)

NPA Split Pros	
Alternative #2	
1	Maintains 7-digit dialing for local calls within the same NPA.

2	Approximately half of the customers would not experience a change if they keep the 502 NPA.
3	Projected lives are balanced.

NPA Split Cons	
Alternative #2	
1	Requires approximately half of 502 NPA customers to change their area code
2	Financial impact to businesses moving to the new NPA to incur costs to change their advertising for telephone #'s and stationery if currently showing 10-digit telephone numbers or are close to the split line
3	Creates widespread customer 10-digit dialing confusion across the new NPA boundary
4	All 502 NPA customers previously went through a split in 1999 and half will have to change their area code again
5	Difficult Commission decision on which side retains the 502 NPA
6	Longer time period needed for service providers to implement this type of relief
7	Customers whose numbers change must contact friends, family and business associates with the telephone number changes
8	More complicated and costly to implement for service providers in their billing, translations and database systems
9	Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers
10	Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers
11	Timing of publication of telephone directories must be coordinated with the implementation of the new NPA
12	Split has a larger impact to existing customers due to change in customers' telephone numbers
13	Split requires significant challenges to service provider's operational support systems and network elements
14	Splits cause customer confusion with caller ID during implementation
15	Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing
16	Splits require the 502 NPA and new NPA to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests
17	Splits require a more challenging customer education process for service providers that have customers on both sides of the split line
18	Splits require the 800/SMS database to be updated
19	Splits reduce the geographic area served by one area code
20	the city(s), counties or legislative districts into different area codes
21	Splits communities of interest
22	For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the new area code during the permissive dialing period
23	The last split implemented was in 2007. There is additional complexity to implement a split

now due to changing technologies. Any lessons learned during the implementation of the last split may now be obsolete.
24 Potential disruptions to Multifactor Authentication (MFA) during the permissive dialing period

Boundary Elimination Overlay Pros		
Alternatives #3 & #5		
#3	#5	
X		1 Eliminates the need to open a new NPA
X	X	2 Does not require customers to change their area code
X	X	3 The boundary elimination overlay is a more efficient use of resources
X	X	4 The boundary elimination overlay minimizes call routing issues, especially with ported numbers compared to a geographic split.
X	X	5 No technical impacts to number portability, text messaging or multimedia messaging.
	X	6 Avoids the need for area code relief planning for a period of 23 years for all NPAs within the state.

Boundary Elimination Overlay Cons		
Alternatives #3 & #5		
#3	#5	
X	X	1 The Boundary elimination overlay relief alternative has a shorter life than the all-services distributed overlay and geographic split.
X	X	2 Impacts a larger quantity of customers than the all-services distributed overlay
X		3 Requires customers in the 502 NPA to dial 10-digits where they would be able to dial 7-digits within the same NPA if an NPA split were implemented.
	X	4 Requires customers in the 502 and 606 NPA to dial 10-digits where they would be able to dial 7-digits within the same NPA if an NPA split were implemented.
X	X	5 Complex customer education process, which would likely lead to increased customer confusion
	X	6 The 606 area code customers will need to transition to 10-digit local dialing sooner than would otherwise be required.
X	X	7 A boundary elimination overlay is much more technically complex to implement than an all-services distributed overlay.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

Consensus was reached to include the following as the dialing plan for the 502 NPA which remains consistent with the 270/364 and the 859 NPA dialing plans:

Dialing Plan for the 502 NPA all-services distributed overlay:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA	10 digits (NPA-NXX-XXXX)*

	(FNPA)	
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

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

Implementation Schedule

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

Event	Timeframe
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within existing 502 NPA can be dialed using 7 or 10 digits)</i> Mandatory 10-digit local dialing period begins at the end of the Permissive Dialing Period	6 months
First CO code activation after Mandatory 10-digit local dialing period begins <i>(Effective date for CO codes from the new NPA) *</i>	1 month (after Mandatory Dialing Period 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 have been assigned.

CUSTOMER EDUCATION AND TECHNICAL MILESTONES:

A recommendation was made, and consensus was reached, to include the following *Customer Education and Technical Milestones* for the 502 NPA All-Services Distributed Overlay implementation.

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

	inserts, direct mail, text messaging, email)	
8	Send reminder notification to PSAPs, Alarm & Safety, Pay Telephone, and directory publishers	Industry committee co-chairs
9	Update social media platforms with information regarding new NPA	All Service Providers & NANPA (optional)
10	Update websites with information regarding new NPA	All Service Providers
11	Issue second mandatory press release just prior to the mandatory dialing date and/or new overlay NPA's effective date	Commission and Service Providers that have the ability (if necessary)

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

	needed)
19 Build E911 Network/Tandem Translations	E911 Providers
20 Verify if all PSAP work has been completed	PSAP's
21 Activate E911 Network/Tandem Translations	E911 Providers

The above are the typical milestones necessary for implementation of an all-services distributed overlay when transitioning from 7 to 10-digit local dialing; however, these milestones may need to be modified during the actual implementation.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Cecilia reviewed the schedule for the remaining activities until the KY 502 NPA petition is filed with the Commission. Consensus was reached on the following schedule:

KY 502 NPA Relief Planning Schedule

- September 24 – Draft Minutes Posted via NNS
- October 1 – Meeting Minutes become Final
- October 3– Post Draft Petition via NNS
- October 10 – Draft Petition Review Meeting at 1:00 PM Eastern Time
- October 29 – File Petition with Kentucky Public Service Commission

NANPA will file the petition for relief with the Commission informing them of the outcome of this relief planning meeting. The petition will be filed no later than October 29, 2024, NANPA will post a draft petition no later than October 3, 2024, and the Industry will reach consensus on the final petition at a meeting scheduled for October 10, 2024.

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD

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

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 24, 2024. 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.

The meeting was adjourned.

###

These minutes became final on September 25, 2024.

**Kentucky 502 NPA
Initial Planning Meeting via Web Conference
September 10, 2024
Participants**

NAME	COMPANY
George Guerra	AT&T
Melinda Yost	Boost Mobile
Kathy Rogers	Boost Mobile
Margaret Cox	CenturyLink/Lumen
Matt Nolan	Charter
Kathy Troughton	Charter
Jeb Pinney	Kentucky Public Service Commission
Brian Thomas	Kentucky Public Service Commission
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Florence Weber	NANPA
Nicole Adkins	TDS
Paul Nejedlo	TDS
Karen Riepenkroger	T-Mobile
Shaunna Forshee	T-Mobile
Chanda Brown	Verizon
Elizabeth Ward	Verizon Wireless
Dana Crandall	Verizon Wireless
Sharon Pistachio	Verizon Wireless
Evan Huff	Vested Networks

Central Office Code Summary

<u>NPA</u>	<u>502</u>	<u>270</u>	<u>364</u>	<u>606</u>	<u>859</u>	
Assigned NXXs	710	783	66	620	555	
Reserved NXXs	0	0	0	0	0	
Unavailable NXXs	21	14	14	29	14	
Available NXXs	69	3	720	151	231	
Total	800	800	800	800	800	
<u>Codes Assignment History</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
502 NPA	8	10	31	20	24	18*
270 NPA	4	3	0	3	2	1*
364 NPA	10	3	20	15	7	7*
606 NPA	6	9	10	19	14	18*
859 NPA	6	4	14	12	13	6*
*As of September 6, 2024						
Exhaust:	Based on the April 2024 NRUF and NPA Exhaust Analysis, the 502 NPA is projected to exhaust in 3Q2027, the 270/364 NPA is projected to exhaust in 3Q2080, the 606 NPA is projected to exhaust in 2Q2034, and the 859 NPA is projected to exhaust in 4Q2045.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS				
ST/NPA:	KY 502	KY 270/364	KY 606	KY 859
MEETING DATE:	9/10/2024	9/10/2024	9/10/2024	9/10/2024
RATE CENTERS				
<i># Total</i>	35	170	125	42
<i># Mandatory</i>	26	159	4	10
<i># Mandatory-Single Service Providers (M*)</i>	0	11	0	0
<i># Optional</i>	9	0	105	32
<i># Excluded</i>	0	0	16	0
BLOCKS ASSIGNED				
<i># Total</i>	386	244	299	175
<i>(For time period 9/1/23 - 9/06/24)</i>				
BLOCKS AVAILABLE				
<i>#Total</i>	238	1504	869	529
<i>(As of preparation date:9/06/24)</i>				
CODES ASSIGNED				
<i># Total</i>	32	8	20	12
<i># for Pool Replenishment</i>	20	6	18	9
<i># for Dedicated Customers</i>	10	0	0	0
<i># for LRNs</i>	2	2	2	3
<i>(For time period 9/01/23 - 9/06/24)</i>				
CODES FORECASTED				
<i># Total</i>	9	0	14	0
<i># for Pool Replenishment and Dedicated Customers</i>	9	0	14	0
<i># for LRNs</i>	0	0	0	0
<i>(For the next twelve months as of:9/06/24)</i>				