



August 1, 2000

TO: 413 NPA Massachusetts Code Holders and Other Industry Members

RE: Petition and Minutes for the 413 NPA Relief Planning Meeting

Attached is the Petition of NANPA on behalf of the Massachusetts Telecommunications industry for the relief of the 413 NPA in western Massachusetts. The Petition was filed with the Massachusetts Department of Telecommunications and Energy on August 1, 2000. The final minutes resulted from the June 20, 2000 industry meeting are also attached.

If you have any questions, please do not hesitate to contact me. My office telephone number is (973) 267-7812. Thank you.

Pamela Kenworthy
NPA Relief Planner – Eastern Region

NEUSTAR, INC.
1120 Vermont Avenue, N.W.
Suite 550
Washington, DC 20005
Phone 202 533 2600
Fax 202 533 2975

**Before the
MASSACHUSETTS DEPARTMENT
OF TELECOMMUNICATIONS AND ENERGY
Boston, Massachusetts 02110**

NANPA, on behalf of the Massachusetts
Telecommunications Industry,

Petition for Approval of Numbering Plan Area
Relief Planning for the 413 Area Code

D.T.E. _____

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE MASSACHUSETTS TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc., in its role as the North American Numbering Plan Administrator (“NANPA”) and acting on behalf of the Massachusetts telecommunications industry (the “Industry”),¹ petitions the Massachusetts Department of Telecommunications and Energy (“Department”) for approval of an all-services distributed overlay relief plan for the 413 Numbering Plan Area (“NPA”).² The Industry reached consensus to recommend the all-services distributed overlay relief plan to the Department at an Industry relief planning meeting held on June 20, 2000. The projections set forth in the 2000 COCUS and NPA Exhaust Analysis indicate that absent NPA relief, the supply of central office codes (often referred to as “CO” or

¹ The Industry is composed of current and prospective telecommunications carriers operating in or considering operations within the 413 area code of Massachusetts.

² As the neutral third party administrator, NANPA has no independent view regarding the Industry’s selected relief option.

“NXX” codes) in the 413 NPA will exhaust during the first quarter of 2002.³ In support thereof, NANPA submits the following:

I. BACKGROUND

Based upon the projected exhaust date and pursuant to Industry guidelines,⁴ NANPA facilitated an Industry meeting in Holyoke, Massachusetts, on June 20, 2000, to review and discuss relief alternatives for the 413 NPA.⁵ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document (“IPD”).⁶ The IPD set forth three relief proposals, an all-services distributed overlay and two geographic split alternatives.⁷ The geographic split alternatives differed as to where the boundary line was placed. No additional alternatives were presented at the meeting.

³ 2000 COCUS and NPA Exhaust Analysis, May 23, 2000 (“2000 COCUS”). The 2000 COCUS can be accessed on NANPA’s web site at <<http://www.nanpa.com>>.

⁴ To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 8, 1999) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

⁵ Attached as Exhibit A is a copy of the June 20, 2000 relief planning meeting minutes.

⁶ NANPA’s initial assessment of the need for relief was based upon the projected exhaust date of third quarter 2002 as set forth in the 1999 COCUS and NPA Exhaust Analysis, January 18, 2000 Update (“1999 COCUS Update”). After NANPA distributed the IPD to the Industry but prior to the relief planning meeting, NANPA released the 2000 COCUS which indicated that the projected life of the 413 NPA was shortened by two quarters to first quarter 2002. Based upon the new exhaust date, the IPD was revised and redistributed to the Industry at the relief planning meeting. Notably, one week prior to the relief planning meeting, NANPA notified the Industry that 100 CO codes had been returned to the pool of available codes increasing the number of CO codes available for assignment to 305. The return of these codes occurred too late to be incorporated into the 2000 COCUS projected exhaust date for the 413 NPA. See Attachment #4 of Exhibit A a monthly CO code assignment history for the 413 NPA.

⁷ A copy of the IPD, including maps depicting each alternative, is attached as Attachment #5 to Exhibit A.

Following extensive discussion regarding attributes of geographic splits and overlays, the Industry reached consensus to recommend to the Department Alternative #1, an all-services distributed overlay, as the preferred form of relief for the 413 NPA. Industry members preferred Alternative #1 over the split alternatives for the following reasons: (1) Alternative #1 provides a consistent dialing plan throughout Massachusetts; (2) the overlay will not divide communities of interest; (3) cellular carriers would not incur additional costs resulting from the manual reprogramming of large quantities of handsets; and (5) customers would not be required to change their telephone numbers. For these reasons, the Industry reached consensus to submit Alternative #1 to the Department for approval.

II. DESCRIPTION OF THE PROPOSED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

Alternative #1 would overlay a new area code on the same geographic area covered by the existing 413 NPA. Consistent with the Federal Communications Commission's regulations, the Industry reached consensus to implement a ten-digit local dialing plan for calls placed both within and between the existing NPA and the overlay NPA.⁸ The Industry also reached consensus to allow customers, at their election, to dial 1+10 digits for all local calls. The projected life for Alternative #1 is five years.

The Industry recommends that the Department approve what it considers an "ideal" implementation schedule consisting of a six-month network preparation period followed by a twelve month permissive dialing period during which customers may dial seven or ten or 1+10 digits for local calls. CO codes will be available in the new NPA one month after the end of the

⁸ See 47 C.F.R. § 52.19(c)(3)(ii).

permissive dialing period. This implementation schedule is based upon a relief order issued prior to the end of September 2000.

III. CONCLUSION

For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests that the Department implement an all-services distributed overlay as the means of relief for the 413 NPA. The Industry also requests that the Department adopt its recommended implementation schedule.

Respectfully submitted,

Cheryl A. Tritt
Kimberly D. Wheeler

MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
(202) 887-1500

Counsel for NeuStar, Inc.

July 28, 2000

**MEETING MINUTES OF THE
413 NPA RELIEF PLANNING INDUSTRY MEETING
HOLYOKE, MASSACHUSETTS
TUESDAY, JUNE 20, 2000**

WELCOME AND INTRODUCTIONS

Pamela Kenworthy, NeuStar, Inc. NPA Relief Planner, introduced herself and then asked the attendees to introduce themselves and identify the companies they represented. There were 22 participants at the meeting representing 13 different entities. See Attachment #1 for the names of those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA'S ROLE AND RESPONSIBILITIES

Ms. Kenworthy shared specific points regarding NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address:
www.atis.org/atis/nanp/nanpreq.htm.

Ms. Kenworthy provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. The list also included the web site addresses of Eastern area NPA Relief Planning staff members and their contact information.

REVIEW OF INDUSTRY GUIDELINES AND ATIS ORGANIZATION

Ms. Kenworthy stated that the purpose of the meeting was for the industry to come to consensus on a single NPA relief plan to submit to the Massachusetts Department of Telecommunications and Energy for consideration. She summarized the NPA relief planning process, including goals and objectives, and how the process is governed by certain guidelines developed by the telecommunications industry. She also reviewed Sections 1 through 12 of the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016; Re-Issued November 1999). This document can be obtained from the internet at *www.atis.org/atis/clc/inc/incdocs.htm*. In addition, Ms. Kenworthy described the relationship of the Alliance for Telecommunications Industry Solutions ("ATIS") organization to the relief planning process, including the ATIS consensus process and the consensus process described in the industry guidelines.

It was noted that only consensus items would be recorded in the minutes and statements which were not adopted pursuant to the consensus process could be included in the meeting minutes in the form of a "Statement for the Record" by the particular company or companies which supported the statement. The meeting format was reviewed and participants were reminded that the meeting minutes serve as the basis of the filing of the recommended relief plan with the Massachusetts Department of Telecommunications and Energy.

NPA RELIEF ALTERNATIVE ATTRIBUTES

Ms. Kenworthy reviewed a summary of General NPA Relief Attributes. Modifications were made by industry consensus to the Attributes and have been incorporated. See Attachment #3.

NPA INFORMATION

Details regarding the 413 NPA were discussed. A monthly code assignment history was reviewed since the beginning of the year 2000 and other pertinent information regarding returned codes, the total available, etc. See attachment #4.

INITIAL PLANNING DOCUMENT FOR 413

Ms. Kenworthy informed the participants that in between the time that the Initial Planning Document (IPD) was distributed (May 23, 2000) and the date of the meeting, the 2000 Central Office Code Utilization Survey (COCUS) became available. Participants received a revised IPD that included a new projected exhaust date for the 413 NPA (1Q2002) and associated projected lives for the alternatives that were developed by NANPA. The IPD proposed three relief alternatives for the 413 NPA: an all services distributed overlay (Alternative #1), and two geographic splits (Alternatives #2 and #3). Maps depicting the various relief alternatives were included with the IPD and described during the meeting. See Attachment #5 for a complete copy of the revised IPD

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 413

No additional alternatives were suggested by the industry.

ELIMINATION OF ALTERNATIVES

A proposal was made and consensus reached to eliminate the two split options, Alternatives #2 and #3.

Statement for the Record from WorldCom

WorldCom strongly favors the geographic split option, but does not oppose the overlay.

CONSENSUS ON RELIEF ALTERNATIVE

A proposal was made and consensus reached to recommend Alternative #1, an all services distributed overlay, to Massachusetts DTE for relief of the 413 NPA.

CONSENSUS ON A DIALING PLAN

Consistent with current FCC regulations, participants reached consensus to recommend mandatory 10-digit or 11-digit (based on the customer's choice) local dialing by all customers between and within area codes and 11 digit dialing for toll calls.

CONSENSUS ON IMPLEMENTATION INTERVALS

Based on the 2000 COCUS projected exhaust date of 1Q2002, the industry reached consensus on the following implementation schedule which it considered "ideal":

6 months network preparation
12 months permissive dialing
1 month to earliest code activation

INDUSTRY COMMITMENT ON A TEST NUMBER

Bell Atlantic volunteered to provide a test number for the relief of the 413 NPA. The industry came to consensus for a CO code in the new NPA to be assigned to Bell Atlantic to provide the test number for use of all service providers during this relief effort.

CONSENSUS ON NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will file the results of the industry 413 NPA relief plan meeting with the Massachusetts DTE. The Petition will cite the following reasons why the two split alternatives were eliminated from consideration.

- Provide a consistent dialing plan throughout Massachusetts
- Less costly for Cellular -Customers do not need a physical number change in their terminal
- Wireline customers do not need to change their numbers
- No split communities of interest.

CONFERENCE CALL TO APPROVE MINUTES

Consensus was reached that the draft minutes and draft filing will be distributed to the industry by July 18, 2000. Additionally, a conference call will be held on the July 25, 2000 to approve the draft filing and meeting minutes. Details regarding the call are as follows:

DATE: July 25, 2000

TIME: 10:00 a.m. Eastern

DIAL: (847) 619-6648 + passcode 5198493

The minutes and Petition were approved during the July 25, 2000 industry conference call with modifications to the NPA information and Implementation schedule. The modifications have been incorporated.

413 NPA RELIEF IMPLEMENTATION MEETING ATTENDEES
June 20, 2000

NAME

COMPANY

	Robinson, Donna	VoiceStream
	Ashe, Rosemary	WorldCom
	Bartholow, Dick	Verizon Paging
	Brown, Jesse	WorldCom
	Duncan, Barry	Bell Atlantic
	Dunphy, Paul	MediaOne
	Haskins, Kathy	Verizon Wireless
	Gauthier, Marsha	CTC Communications
	LaBree, Nicole	Cellular One
	LaPointe, Linda	Conversent Communications
	Mulqueen, April	Massachusetts Department of Telecommunications & Energy
	Rappaport, Bruce	Verizon Wireless
	Reed, Karlen	Office of the Attorney General
	LaGattuta, Paul	AT&T
	Rush, Eileen	Bell Atlantic
	Walls, Myra	Bell Atlantic
	Zadrozny, Janet	Bell Atlantic
	Penders, Kevin	Massachusetts Department of Telecommunications & Energy
	Polchopek, Stephen	Granby Telephone
	Mugnier, Charlotte	Granby Telephone
	Zarzour, Samuel	Global Naps
	Kenworthy, Pamela	NANPA
	Milby, Wayne	NANPA
	Briggs, Don	SNET Wireless/SCLP
	Spigle, Ken	Law Office of Kenneth Spigle – Representing Sprint PCS

413 NPA MASSACHUSETTS RELIEF INDUSTRY MEETING

Tuesday, June 20, 2000

Holiday Inn

245 Whiting Farms Road

Holyoke, MA 01040

Telephone: (413) 534-3311

- 8:30 Welcome and Introductions
- 8:45 NANPA's Role and Responsibilities
- 9:00 Consensus Process
- 9:15 Minutes and "Statements For The Record"
- 9:30 Industry Guidelines/Relief Attributes
- 9:45 NPA Information
- 10:00 Review Initial Planning Document
- 11:00 Break
- 11:15 Additional Alternatives from Industry
- 12:00 Lunch (On Your Own)
- 1:00 Elimination Of Alternatives
- 2:00 Consensus On Relief Alternative
- 2:10 Consensus on Dialing Plan
- 2:30 Consensus on Implementation Intervals
- 2:50 Industry Commitment For Test Number
- 3:00 "Statements for the Record"
- 3:15 Consensus on NANPA Filing Industry Efforts With Commission
- 3:30 Set Date For Conference Call To Approve Meeting Minutes
- 3:45 Complete NANPA Survey
- 4:00 Adjourn

Splits

Overlays

General Attributes of Splits

- Splits provide a single area code for each geographic area. Future splits will reduce the geographic size of the area code.
- Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.
- Geographic splits permit 7-digit for local calls within an area code.
- Geographic splits would increase the amount of 11-digit dialing within western Massachusetts.

General Attributes of Overlays

- With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
 - An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
 - In the absence of a waiver, an overlay will require customers to dial 10 Digits or 1 + 10 digits for all calls within the geographic area.
 - Given the DTE's recent relief order, an overlay would provide consistent dialing statewide.
-
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NPA 413

Born on Date July 1947

LATA 126 – Western Massachusetts

2000 COCUS Projected Exhaust 1Q2002

Code Assignment History

MONTH (2000)	NUMBER ASSIGNED	TOTAL AVAILABLE	TOTAL UNAVAILABLE
JANUARY	7		
FEBRUARY	5		
MARCH	26		
APRIL	29		
MAY	11		
JUNE*	5 *		
TOTAL AVAILABLE		305**	
TOTAL UNAVAILABLE			44 ***

* Month to Date

** One week prior to the June 20, 2000 industry meeting, 100 Central Office codes were returned; these are not reflected in the 2000 COCUS projection.

**** * Includes Reserved, Hold and Test Numbers**

Initial Planning Document
For Relief of Massachusetts: 413 NPA
2000 COCUS Projected Exhaust Date 1Q02

North American Numbering Plan Administration

413 NPA Relief Alternatives 2000 COCUS Projected Exhaust Date 1Q02

Possible relief alternatives outlined within this document include one Overlay alternative (as required by Section 5.2 of the NPA Code Relief Planning and Notification Guidelines) and two different split relief methods. Each relief option covers a period of at least five years beyond the predicted date of exhaust. Since the relief options shall be a living document, changes that take place over time (e.g. annual COCUS, demand for NXX codes, local competition, etc.) will be reflected and the options updated.

Overlay Alternatives

Alternative #1

All Services Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 413 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 413 NPA all code assignments will be made in the overlay area code.

Total codes at Exhaust = 678

Area code life in years = 5

Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

Alternative #2

Geographic Split

The split boundary line runs along rate center boundaries approximately on the county boundary line that separates Hampden County from Hampshire County. Rate centers to the north of the boundary line would be considered Area A and the remaining area would be considered Area B. Rate centers in Area B would consist of the following rate centers: Chester, Blandford, Granville, Russell, Westfield, Southwick, Holyoke, Chicopee, Springfield, East Longmeadow, Longmeadow, Ludlow, Wilbraham, Hampden, Palmer, Monson and Brimfield and Warren.

Area A

Total codes at Exhaust = 353

Area code life in years = 5

Area B

Total codes at Exhaust = 325

Area code life in years = 5

**413 NPA Relief Alternatives
2000 COCUS Projected Exhaust Date 1Q02**

Split Alternatives (Cont'd)

Alternative #3

Geographic Split

The split boundary line runs along rate center boundaries separating the southeast portion of the 413 NPA from the remaining geographic area. Area A would be considered the northern half of the NPA. The following rate centers would be in Area B: Westfield, Southwick, Holyoke, Chicopee, Springfield, East Longmeadow, Longmeadow, Granby, Ludlow, Wilbraham, Hampden, Belchertown, Palmer, Monson, Gilbertville, Ware, Warren and Brimfield.

Area A

Total codes at Exhaust = 350

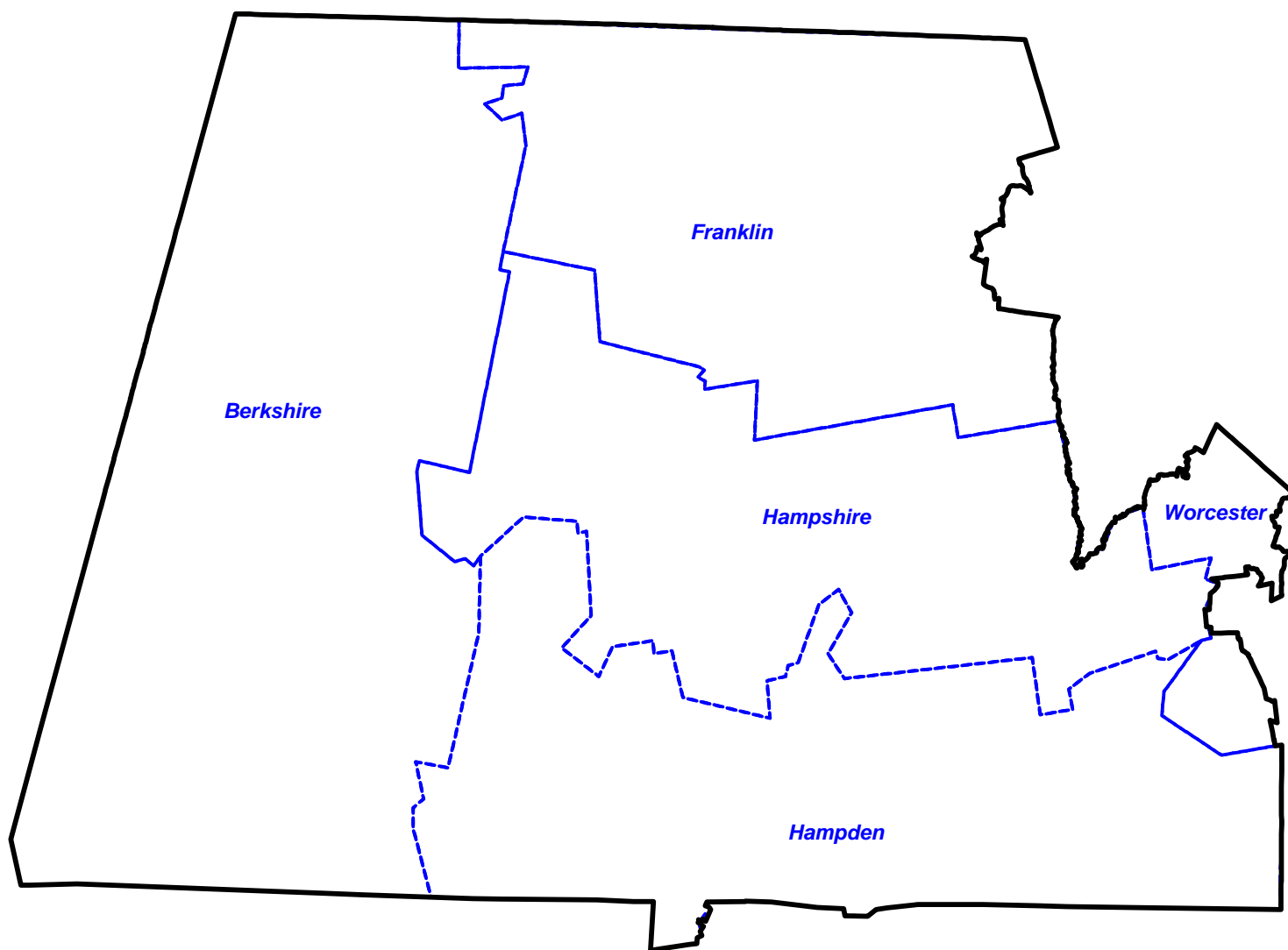
Area code life in years = 5

Area B

Total codes at Exhaust = 328

Area code life in years = 5

NPA 413 County Map



NPA 413 Legend

- NPA Boundaries
- County Boundaries



ALTERNATIVE #1
DISTRIBUTED OVERLAY



NPA 413 Map Legend

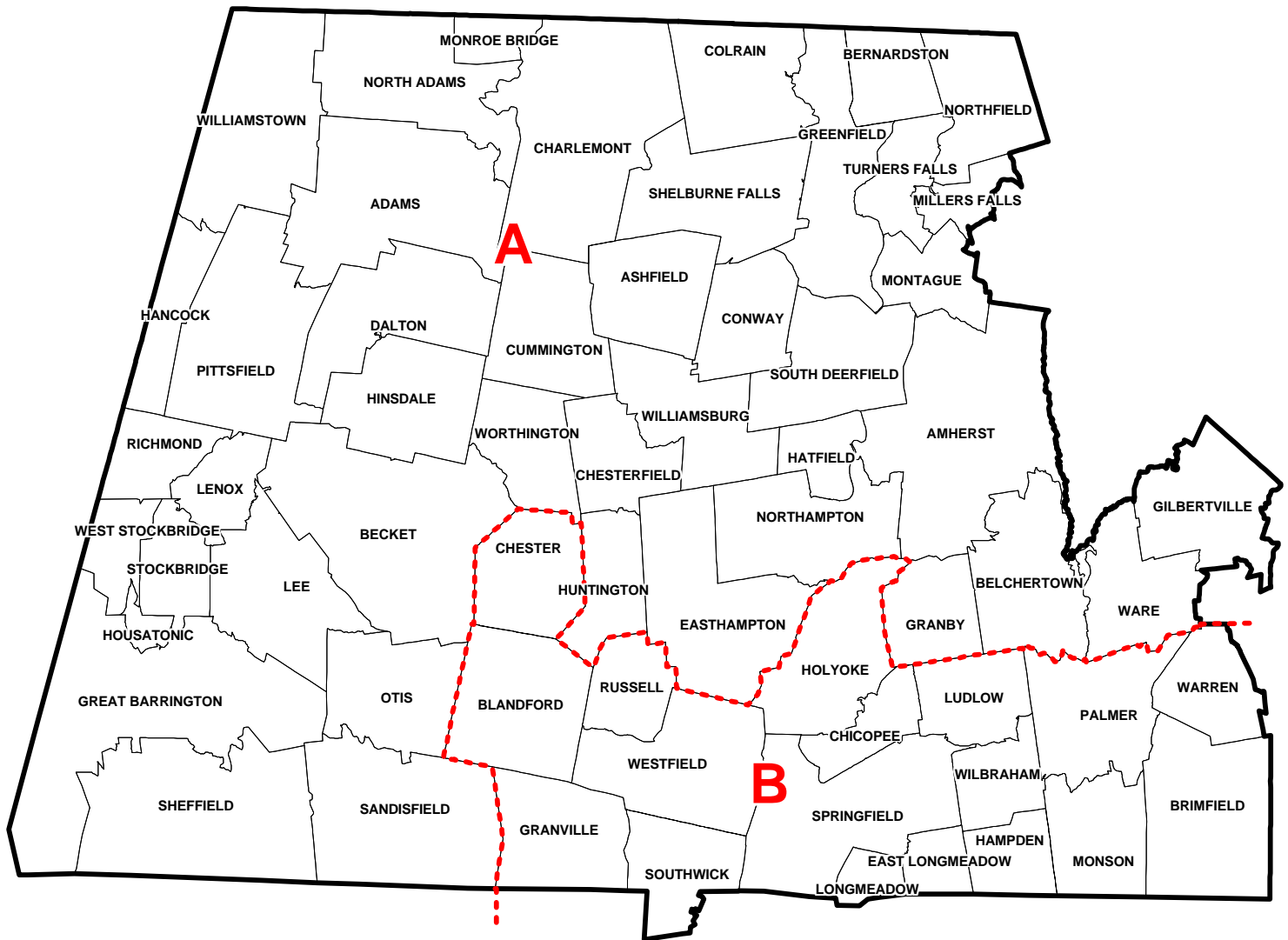
- NPA Boundaries
- Rate Center Boundaries

ALTERNATIVE #1	PROJECTED LIFE
DISTRIBUTED OVERLAY	5 Years

NPA 413 Rate Center Map



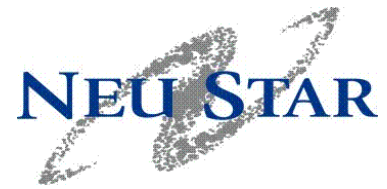
ALTERNATIVE #2 Geographic Split



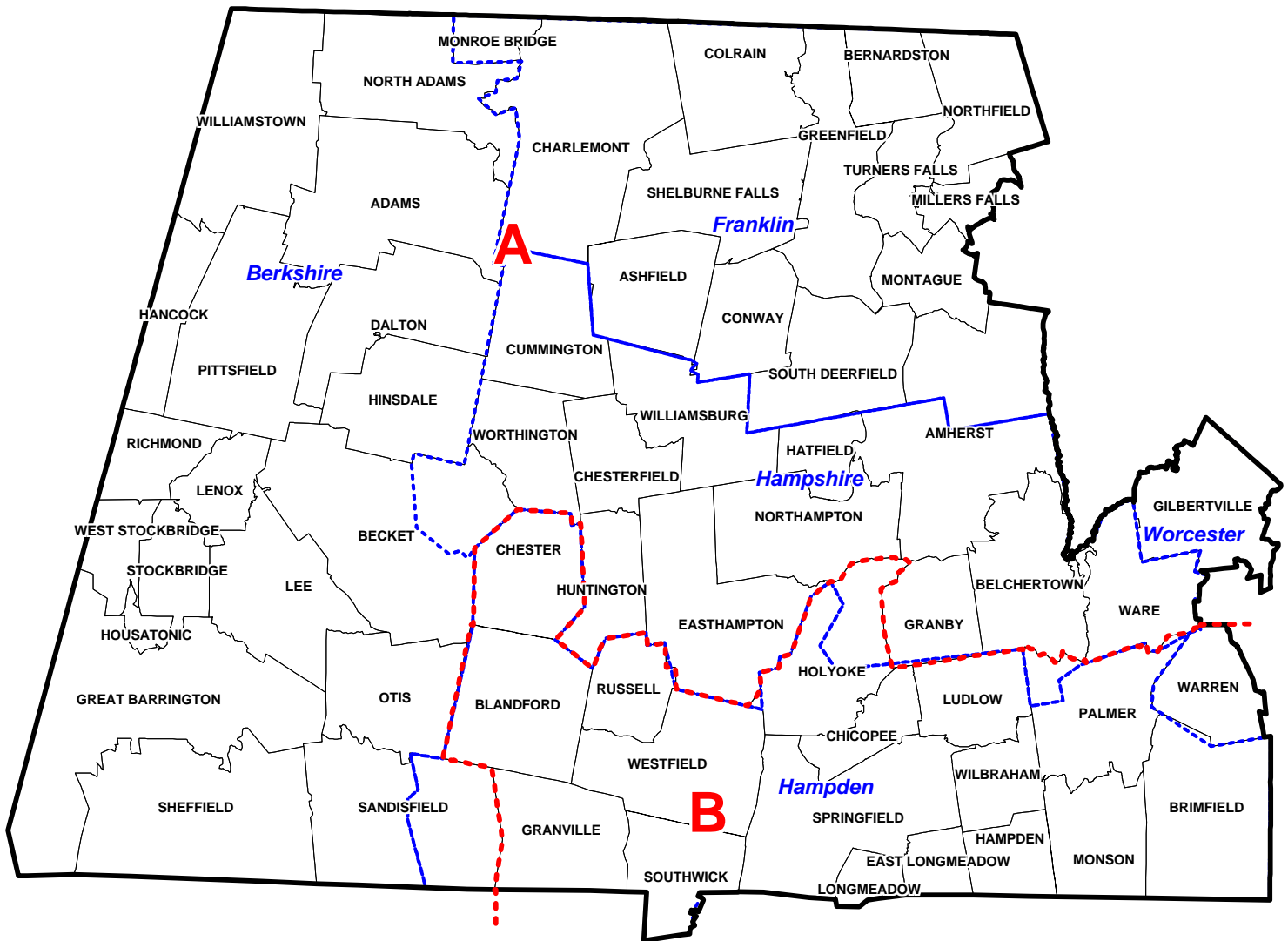
NPA 413 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- - - Split Line

ALTERNATIVE #2	PROJECTED LIVES
Area A	5 Years
Area B	5 Years



ALTERNATIVE #2 Geographic Split



NPA 413 Map Legend

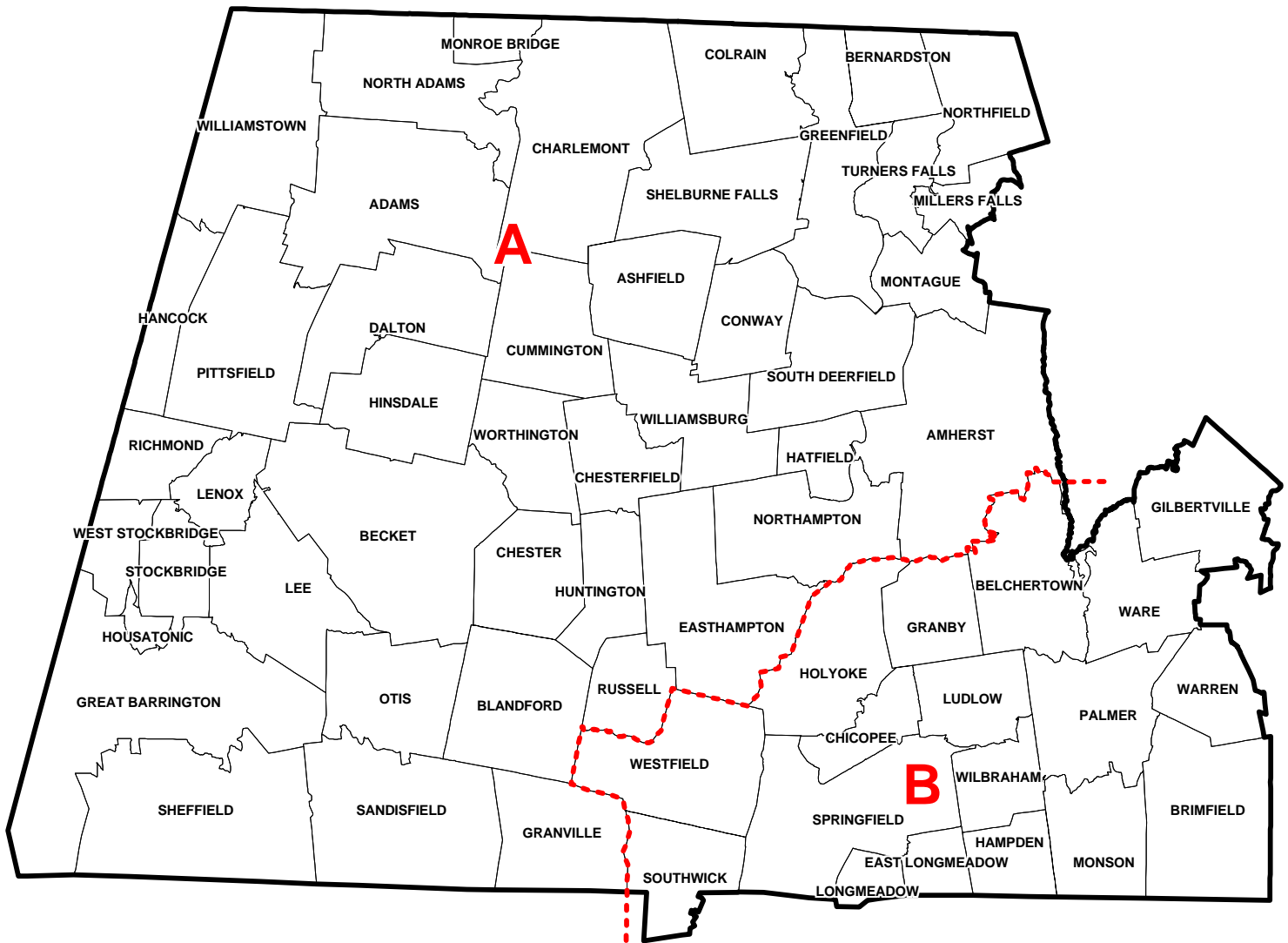
- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

ALTERNATIVE #2	PROJECTED LIVES
Area A	5 Years
Area B	5 Years




NPA 413 Rate Center Map



ALTERNATIVE #3 Geographic Split

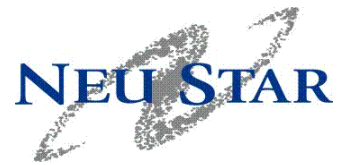


NPA 413 Map Legend

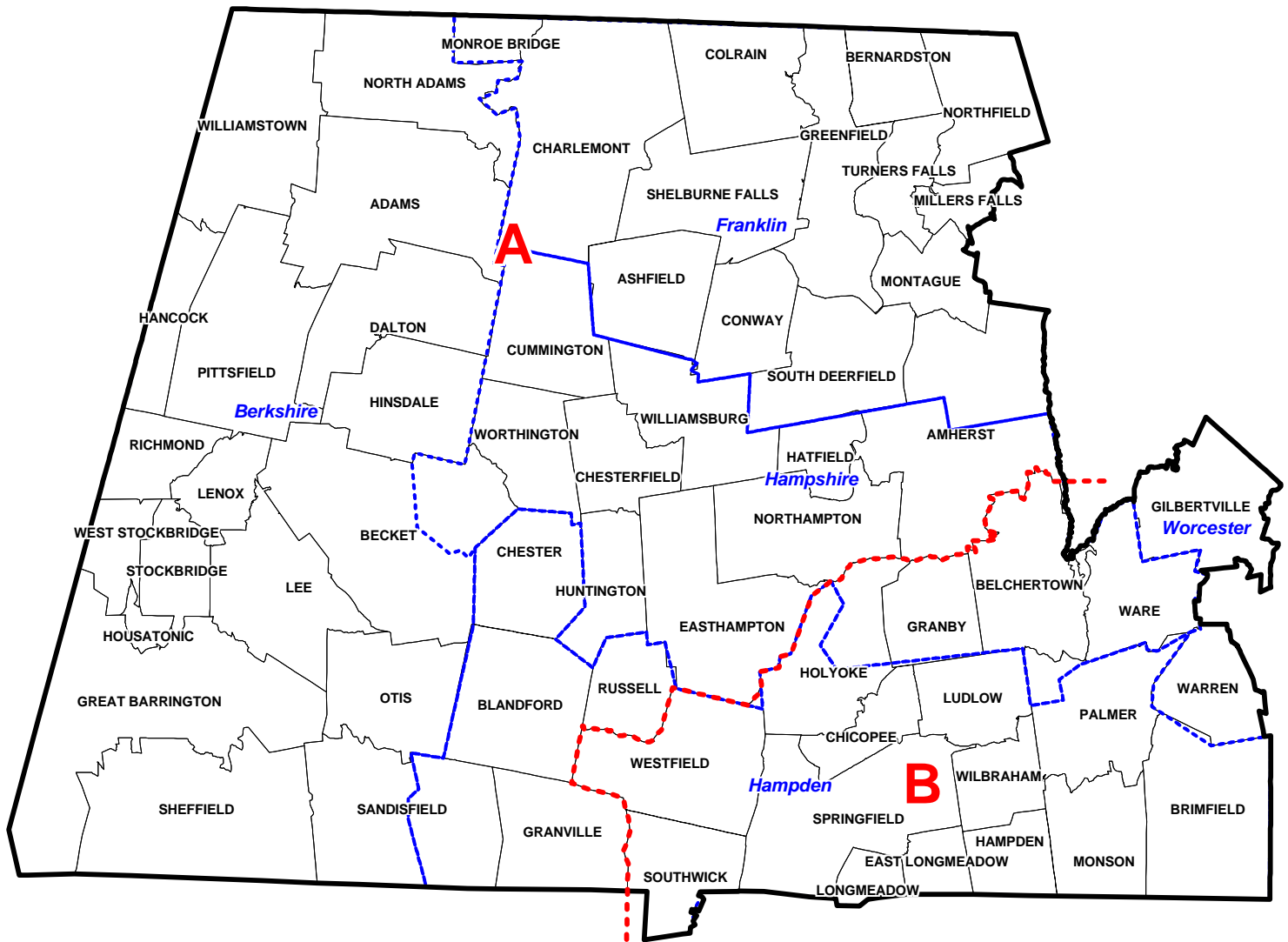
-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

ALTERNATIVE #3	PROJECTED LIVES
Area A	5 Years
Area B	5 Years

NPA 413 Rate Center & County Map



ALTERNATIVE #3 Geographic Split



NPA 413 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

ALTERNATIVE #3	PROJECTED LIVES
Area A	5 Years
Area B	5 Years

MASSACHUSETTS 413 NPA ALTERNATIVES

PROJECTED LIFE OF RELIEF ALTERNATIVES IN YEARS

REGULAR LIVES

<u>Alternative</u>	<u>Area A</u>	<u>Area B</u>
#1		5
#2	5	5
#3	5	5