Before the
NEW HAMSHIRE PUBLIC UTILITIES COMMISSION
Concord, NH 03301

NANPA, on behalf of the	)	
New Hampshire Telecommunications Industry,	)	
Petition for Approval of NPA Relief Plan	)	Docket No. _____
for the 603 NPA	)	

PETITION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE NEW HAMPSHIRE TELECOMMUNICATIONS INDUSTRY

NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"), in its role as the neutral third party NPA Relief Planner for New Hampshire under the North American Numbering Plan and on behalf of the New Hampshire telecommunications industry ("Industry"),[1] petitions the New Hampshire Public Utilities Commission ("Commission")[2] to approve the Industry's consensus decision[3] to recommend to the Commission an all services distributed overlay as its preferred form of relief for the 603 numbering plan area ("NPA").[4] The Industry submits its recommendations to the Commission based upon NANPA's projections that

[1] The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 603 area code of New Hampshire.

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

[3] Consensus as used in this document means: 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. ATIS Operating Procedures, section 7.1, version 5.0, August 17, 2009.

[4] As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry. In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS - 0300061, March 12, 2010) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at http://www.atis.org.

absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 603 NPA will exhaust during the third quarter of 2012. In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 603 NPA, the Industry recommends that the Commission approve the recommended 17 month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

Relief planning for the 603 NPA began in 1999 when the 1998 Central Office Code Utilization Survey ("COCUS") for CO codes indicated that the 603 NPA would exhaust during the fourth quarter of 2000.[5] Due to the projected exhaust, NANPA notified the Commission and the Industry that NPA relief needed to be addressed. The Industry met on November 19, 1998 in Manchester, New Hampshire to address relief alternatives.[6] Pursuant to the NPA Relief Planning Guidelines, NANPA presented an Initial Planning Document ("IPD") at the meeting.[7] The IPD suggested three relief alternatives and a fourth alternative, an expanded overlay, was proposed during the meeting. Industry consensus regarding the four alternatives was not achieved at the initial meeting, and a second meeting was held on January 7, 1999. The information furnished by the NANPA to the participants during the November and January meetings included geographical maps of the 603 NPA, a description of each relief alternative including dialing requirements and the projected life in years of the relief alternatives. At the January 7, 1999 meeting, the participants discussed the various relief alternatives, eliminated

[5] 1998 Central Office Code Utilization Survey ("COCUS").

[6] A copy of the November 19, 1998 meeting minutes was included as Exhibit A of the initial petition filed with the Commission on February 18, 1999.

[7] A copy of the IPD was included as Attachment 2 to Exhibit A of the initial petition filed with the Commission on February 18, 1999.

three such alternatives consisting of two geographic split options and an expanded multi-state overlay option, and eventually reached consensus to recommend an all services area code overlay to the Commission.

On February 18, 1999 NANPA submitted for filing a Petition of the North American Numbering Plan Administrator on behalf of the New Hampshire Telecommunications Industry to the Commission requesting approval of a relief plan for the 603 NPA. The Commission deferred issuance of a written decision and began implementing number conservation measures.[8]

On July 13, 2004 the Commission dismissed the order without prejudice. The order stated: "We find that the efforts of the industry to reach consensus, as well as the efforts of the Parties and Staff to present pros and cons of different area code relief methods, should be preserved. We shall therefore dismiss this petition without prejudice. The Petition may be re-filed by NANPA as the basis for instituting area code relief when necessary."[9]

II. INDUSTRY MEETING TO RE-FILE PETITION

Based upon the current projected exhaust date of the 603 NPA and in accordance with the Commission's Dismissal Order, NANPA conducted an Industry conference call on June 30, 2010 during which the Industry reached consensus to re-file the petition with the Commission.[10] That original petition is attached hereto as Exhibit B. In order to advance the Commission's stated goal of basing its relief determination upon "recent experience, expectations and facts," NANPA has updated certain information from the original petition.[11] The following table sets

[8] *Petition for Approval of Area Code Numbering relief Plan, Order Dismissing without Prejudice*, Order No. 24,350, DT 99-603 (July 13, 2004) ("Dismissal Order") pp 4-6.

[9] *Id.* at 8.

[10] A copy of the June 30, 2010 meeting minutes is attached hereto as Exhibit A. Updated maps of the relief alternatives are included in the meeting minutes.

[11] Dismissal Order at 8.

forth the projected lives of the alternatives originally calculated in 1998 and as recalculated using the most recent forecast data.[12]

NH 603 NPA

	Type of Relief	Originally Projected Lives – 11/19/98	Updated Projected Lives – 5/6/10
Alt. #1	All Services Overlay	6 to 12 years	35 years
Alt. #2	Geographic Split	Area A: 6 to 11 years Area B: 7 to 14 years	Area A: 25 years Area B: 48 years
Alt. #3	Geographic Split	Area A: 7 to 14 years Area B: 6 to 11 years	Area A: 38 years Area B: 32 years

As the table demonstrates, the projected lives of each relief alternative have been extended. This is due to the reduced demand for NXX codes, which can be attributed to various number conservation measures such as utilization thresholds and thousand block number pooling. It should be noted that the recalculation of the lives of the relief alternatives resulted in a significant difference of more than 10 years between the updated lives of Area A and Area B for Alternative #2. According to industry guidelines to which NANPA adheres for relief planning, severe imbalances of more than 10 years in NPA lifetimes are to be avoided.[13] Accordingly, Alternative #2 no longer is a valid relief alternative for consideration.

[12] The updated projected lives of the relief NPAs as listed here are based upon data from the April 2010 NRUF Report.

[13] NPA Relief Planning Guidelines at §5.0(g).

III. DESCRIPTION OF THE RECOMMENDED RELIEF PLAN

As set forth in the original petition, the Industry reached consensus to recommend an all-services distributed overlay to the Commission as the preferred form of relief for the 603 NPA. Alternative #1 would superimpose a new NPA over the same geographic area covered by the existing 603 NPA. All existing customers would retain the 603 area code and would not have to change their telephone numbers. The projected life of the new overlay NPA using current data is 35 years. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all calls within and between the 603 NPA and the new NPA.[14] The industry recommends that all local and toll calls between the 603 NPA and the new NPA be dialed as 10-digits, or permissively as 1+10 digits at each service provider's discretion. All local and toll calls originating in the 603 NPA or new NPA and terminating in other NPAs (NPAs other than the 603 or new NPA) must be dialed as 1 + 10 digits. Operator services calls would require customers to dial 0 + 10 digits. The following table illustrates the recommended dialing plan:

Recommended Overlay Dialing Plan for All Services Distributed Overlay

Type of Call	Call Terminating in	Dialing Plan
Local & Toll Calls	Overlay Home NPAs (HNPA)	10 digits (NPA-NXX-XXXX)*
Local & Toll Calls	Foreign NPA (FNPA) outside of overlay	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 for all HNPA and FNPA calls permissible at each service provider's discretion

When the 603 NPA exhausts, all CO code assignments will be made from the new overlay area code.

[14] 47 C.F.R. § 52.19(c)(3)(ii).

Industry participants reached consensus to recommend to the Commission a 17 month schedule for implementing the all-services distributed overlay. The schedule, provided below, includes recommended intervals for each implementation phase.

Recommended Implementation Schedule for All Services Distributed Overlay

EVENT	TIMEFRAME
Network Preparation and Customer Education Period	8 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within 603 NPA can be dialed using 7 or 10 digits)* Mandatory dialing begins at the end of the Permissive Dialing Period	8 months
First Code Activation after end of Permissive dialing period *(Effective date for codes from the new NPA)*	1 month (after Mandatory Dialing Period)
Total Implementation Interval	17 months

III. CONCLUSION

The Industry has determined the need to re-start relief efforts for the 603 NPA in New Hampshire to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving the Industry's recommended relief alternative for

the 603 NPA, an all services distributed overlay, and the industry's recommended 17 month implementation interval.

Respectfully submitted,

/s/_____

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August 9, 2010

EXHIBIT A

NEW HAMPSHIRE – 603 NPA
RE-FILE RELIEF PETITION CONFERENCE CALL
FINAL MEETING MINUTES
June 30, 2010

WELCOME, INTRODUCTIONS & PURPOSE OF MEETING

Wayne Milby, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment 1. This meeting was convened to re-file the NH 603 NPA relief petition.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Wayne stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He briefly reviewed the consensus process and explained the method by which consensus is determined. In addition, Wayne stated the minutes would be comprised of consensus items and statements for the record can be made at anytime during the meeting.

CO CODE ADMINISTRATION STATUS OF NEW HAMPSHIRE 603 NPA

Beth Sprague of NANPA CO Code Administration provided a read-out of the monthly CO Code Assignment Activity for the New Hampshire 603 NPA (See Attachment 2). She reported as of June 29, 2010, there were 50 NXX codes available for assignment, 727 assigned NXX codes, and 23 unavailable NXX codes.

Wayne provided the historical code assignment activity as depicted below:

- 2006 assignments = 10 codes
- 2007 assignments = 4 codes
- 2008 assignments = 8 codes
- 2009 assignments = 15 codes
- 2010 assignments through June = 3 codes

POOLING ADMINISTRATION STATUS

Cecilia McCabe, NeuStar Pooling Implementation, reported that pooling commenced May 1, 2000, there are 149 rate centers (RCs), 124 RCs are mandatory pooling, 0 RCs are mandatory with only one service provider, 25 RCs are optional pooling and 0 RCs are excluded from pooling. As of June 29, 2010, in the past twelve months 85 blocks have been assigned and there are 1541 blocks available for assignment. Pooling has assigned 17 codes in the last twelve months; 15 for pool replenishment, 0 for dedicated customers and 2 for LRNs. The forecasted need for codes for the next twelve months is 10 codes, 7 for pool replenishment and dedicated customers and 3 for LRNs. (See Attachment 3)

FORECASTED EXHAUST

The April 2010 NRUF projects the NH 603 NPA will exhaust 3Q2012.

BACKGROUND

Wayne reviewed the Relief Planning background for the 603 NPA that began in 1999 when the 1998 Central Office Code Utilization Survey ("COCUS") for CO Codes indicated that the 603 NPA would exhaust during the fourth quarter 2000. Due to the

projected exhaust, NANPA notified the New Hampshire Public Utilities Commission ("Commission") and Industry that NPA relief needed to be addressed. The Industry met on November 19, 1998 in Manchester, New Hampshire to address relief alternatives. Pursuant to the NPA Relief Planning Guidelines, NANPA presented an Initial Planning Document ("IPD") at the meeting. The IPD suggested three relief alternatives and a fourth alternative, an expanded overlay, was proposed during the meeting. Industry consensus regarding the four alternatives was not achieved at the initial meeting, and a second meeting was held on January 7, 1999. The information furnished by the NANPA to the participants during November and January meetings included geographical maps of the 603 NPA, a description of each relief alternative including dialing requirements and projected life in years of the relief alternatives. At the January 7, 1999 meeting, the participants discussed the various relief alternatives, eliminated three such alternatives consisting of two geographic split options and an expanded multi-state overlay option, and eventually reached consensus to recommend an all services area code overlay to the Commission

On February 18, 1999 NANPA submitted for filing a Petition of the North American Numbering Plan Administrator on behalf of the New Hampshire Telecommunications Industry to the Commission requesting approval of a relief plan for the 603 NPA.

On July 13, 2004 the Commission dismissed the order without prejudice. The order stated: "We find that the efforts of the industry to reach consensus, as well as the efforts of the Parties and Staff to present pros and cons of different area code relief methods, should be preserved. We shall therefore dismiss this petition without prejudice. The petition may be re-filed by NANPA as the basis for instituting area code relief when necessary."

NH 603 RELIEF ALTERNATIVE LIVES RECALCULATED

Wayne reviewed the following table that sets forth the projected lives of the alternatives as originally calculated in 1998 by NANPA and as recalculated using the most recent forecast data:

NH 603 NPA

	Type of Relief	**Originally Projected Lives – 11/19/98**	**Updated Projected Lives – 5/6/10**
Alt. #1	All Services Overlay	6 to 12 years	35 years
Alt. #2	Geographic Split	Area A: 6 to 11 years Area B: 7 to 14 years	Area A: 25 years Area B: 48 years
Alt. #3	Geographic Split	Area A: 7 to 14 years Area B: 6 to 11 years	Area A: 38 years Area B: 32 years

Wayne noted as the table demonstrates, the projected lives of each alternative have been extended. This is due to reduced demand for NXX codes, which can be attributed to various number conservation measures such as utilization thresholds and thousands block number pooling. He noted the recalculated lives of the relief alternatives resulted in a significant difference of more than 10 years between the updated lives of Area A and

Area B for Alternative #2. According to the industry guidelines severe imbalances of more than 10 years in NPA lifetimes are to be avoided.

The industry also reviewed the attached updated County and Rate Center maps for the three alternatives.

CONSENSUS ON DIALING PLAN (ALTERNATIVE #1)
It was noted that New Hampshire does not require the digit 1 as a toll indicator in its dialing plan. Consensus was reached to recommend the following dialing plan for Alternative #1:

Overlay Dialing Plan for Alternative # 1:

Type of Call	Call Terminating in	Dialing Plan
Local & Toll Calls	Overlay Home NPAs (HNPA)	10-digits (NPA-NXX-XXXX)*
Local & Toll Calls	FNPA outside of overlay	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 for all HNPA and FNPA calls permissible at each service provider's discretion

ESTABLISH IMPLEMENTATION SCHEDULE
A recommendation was made and consensus reached to recommend to the Commission a 17-month schedule for implementation of the overlay.
The recommended schedule is as follows:

Intervals for Alternative # 1 – Overlay:

EVENT	**TIMEFRAME**
Network Preparation and Customer Education Period	8 months
Permissive 10-Digit Dialing and Customer Education Period *(Calls within 603 NPA can be dialed using 7 or 10 digits)* Mandatory dialing begins at the end of Permissive Dialing Period	8 months
First Code Activation after end of Permissive dialing period. *(Effective date for codes from the new NPA)*	1 month (after Mandatory Dialing Date)
Total Implementation Interval	17 months

OPEN DISCUSSION
As a result of an inquiry from the NH PUC staff regarding the length of implementation intervals for a geographic split, the industry reached consensus to include reference in these minutes to the last split that took place which was in New Mexico in 2007. The details can be reviewed in Planning Letter 358 which can be found on the NANPA website.

CONSENSUS TO RE-FILE PETITION FOR AN ALL SERVICES DISTRIBUTED OVERLAY

The industry reviewed the draft petition distributed with the invitation to this meet. A discussion ensued among the participants resulting in consensus to re-file the NH 603 NPA petition with the Commission requesting approval of an all services distributed overlay for the 603 NPA

STATEMENTS FOR THE RECORD

There were no statements submitted for the record.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will prepare a final draft of the petition that will be filed with the Commission informing them of the outcome of this meeting. The draft filing will be reviewed by the industry on the conference call to approve these draft minutes and the industry will determine at that time when the petition will be filed.

REVIEW OF DRAFT MEETING MINUTES & DRAFT COMMISSION FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by July 14, 2010 and the draft relief petition distributed to the industry by July 21, 2010. Consensus was also reached to conduct a conference call on July 28, 2010 to review and approve the draft minutes and draft filing to the Commission. Details of the call are as follows:

Date: July 28, 2010
Time: 2:00 PM ET; 1:00 PM CT; 12:00 PM MT; 11:00 AM PT
Dial-in number: 630-827-6799
Pass code: 9141146#

Adjourn

# # #

During the July 28, 2010 call to review and approve the draft minutes and draft petition, consensus was reached to approve the draft petition and draft minutes, with edits that have been incorporated in these final documents, and file the Petition with the NH PUC no later than August 11, 2010.

NEW HAMPSHIRE – 603 NPA
RE-FILE RELIEF PETITION CONFERENCE CALL
Final Meeting Attendees
June 30, 2010

NAME	COMPANY
George Guerra	AT&T
Trina Bragdon	CRC Communications of Maine
Nancy Foley	CRC Communications of Maine
Leslie Miklos	Fairpoint Communications
Chris Rand	Granite State Communications
Debbie Akins	Level 3
Heidi Caudill	Level 3
Jennifer Pyn	Metro PCS
Terri Flowers-Grimshaw	Metro PCS
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA CO Code Admin
Linda Hymans	NeuStar Pooling Regulatory
Cecilia McCabe	NeuStar Pooling Implementation
Kevin Gatchell	NeuStar Pooling Admin.
Jennifer Ducharme	NH Public Utility Commission
David Goyette	NH Public Utility Commission
Christina McKay	RNK Communications
Shaunna Forshee	Sprint
Karen Riepenkroger	Sprint
Paul Nejedlo	TDS Telecom
Gwen Zahn	Verizon Wireless

New Hampshire

Attachment 2

NPA 603 NXX Summary

Data as of June 29, 2010

NPA	**570**					
Assigned NXXs	727					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	23	See Note				
Available NXXs	50					
Total	800					
Codes Assigned NPA 603	01/2006	02/2006	03/2006	04/2006	05/2006	06/2006
	0	0	2	0	0	0
	07/2006	08/2006	09/2006	10/2006	11/2006	12/2006
	0	1	1	4	1	1
	01/2007	02/2007	03/2007	04/2007	05/2007	06/2007
	0	0	1	0	0	0
	07/2007	08/2007	09/2007	10/2007	11/2007	12/2007
	0	1	1	0	0	1
	01/2008	02/2008	03/2008	04/2008	05/2008	06/2008
	1	1	1	0	1	2
	07/2008	08/2008	09/2008	10/2008	11/2008	12/2008
	1	1	0	0	0	0
	01/2009	02/2009	03/2009	04/2009	05/2009	06/2009
	0	0	0	0	1	0
	07/2009	08/2009	09/2009	10/2009	11/2009	12/2009
	1	0	0	5	8	0
	01/2010	02/2010	03/2010	04/2010	05/2010	06/2010
	0	0	1	0	1	*1
* As of 6/29/10						

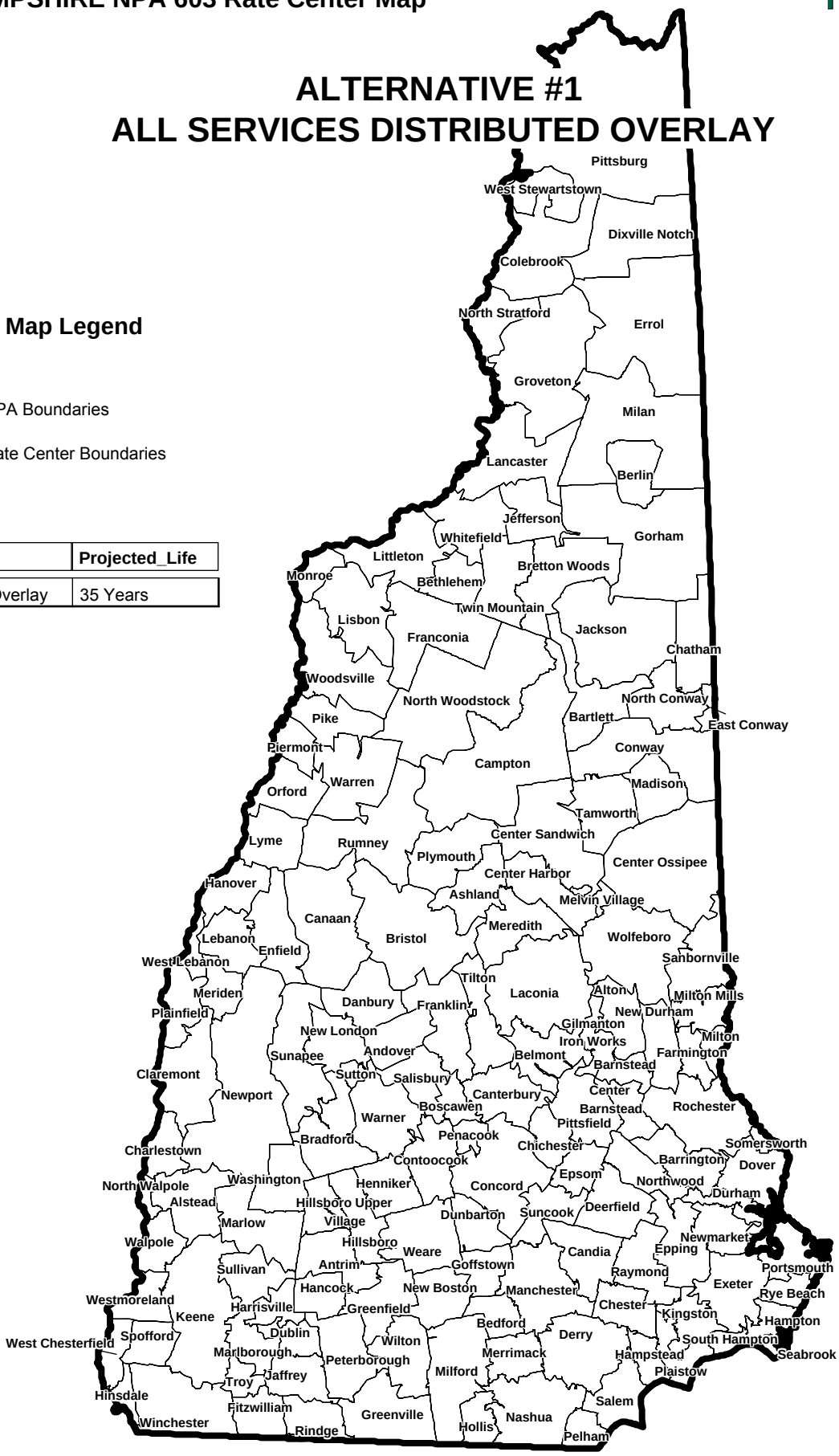
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).

POOLING STATISTICS	
Provided By: Cecilia McCabe	
ST/NPA:	NH 603
MEETING DATE:	6/30/2010
MEETING SUBJECT:	
Relief Planning	X
Jeopardy	
Jeopardy Status Review	
Other	
POOL START DATE (PSD)	5/1/2000
RATE CENTERS	
# Total	149
# Mandatory	124
# Mandatory-Single Service Providers (M*)	0
# Optional	25
# Excluded	0
BLOCKS ASSIGNED	
# Total	85
(For time period 06/01/09-06/29/10)	
BLOCKS AVAILABLE	
#Total	1541
(As of preparation date: 06/29/10)	
CODES ASSIGNED	
# Total	17
# for Pool Replenishment	15
# for Dedicated Customers	0
# for LRNs	2
(For time period 06/01/09-06/29/10)	
CODES FORECASTED	
# Total	10
# for Pool Replenishment and Dedicated Customers	7
# for LRNs	3
(For the next twelve months as of 06/29/10)	

NEW HAMPSHIRE NPA 603 Rate Center Map

neustar

ALTERNATIVE #1
ALL SERVICES DISTRIBUTED OVERLAY



Produced by CDS Business Mapping 04/2010

NEW HAMPSHIRE NPA 603 Rate Center Map

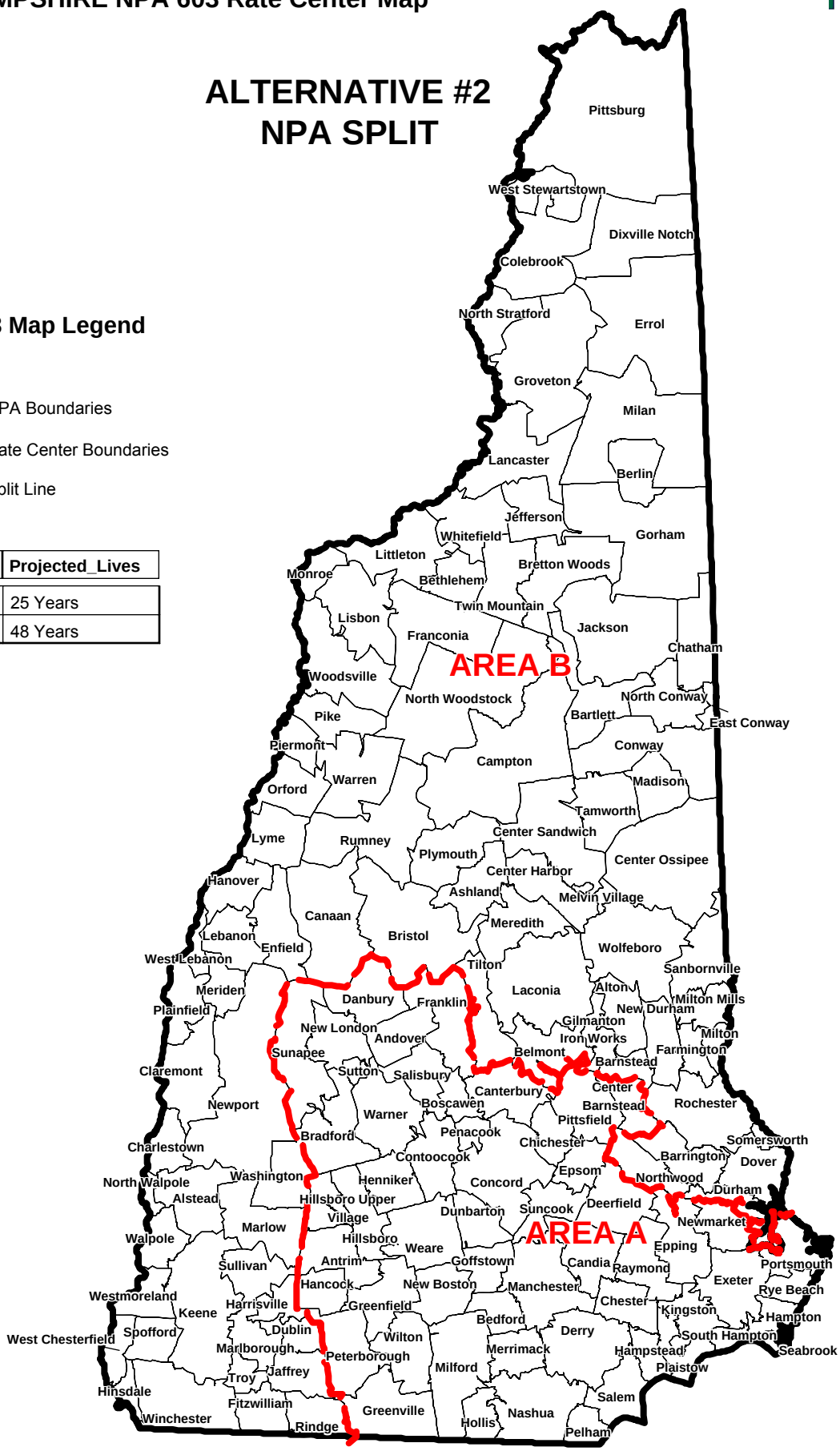
neustar

ALTERNATIVE #2
NPA SPLIT

NPA 603 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alt#2	Projected_Lives
Area "A"	25 Years
Area "B"	48 Years



Produced by CDS Business Mapping 04/2010

NEW HAMPSHIRE NPA 603 County Map

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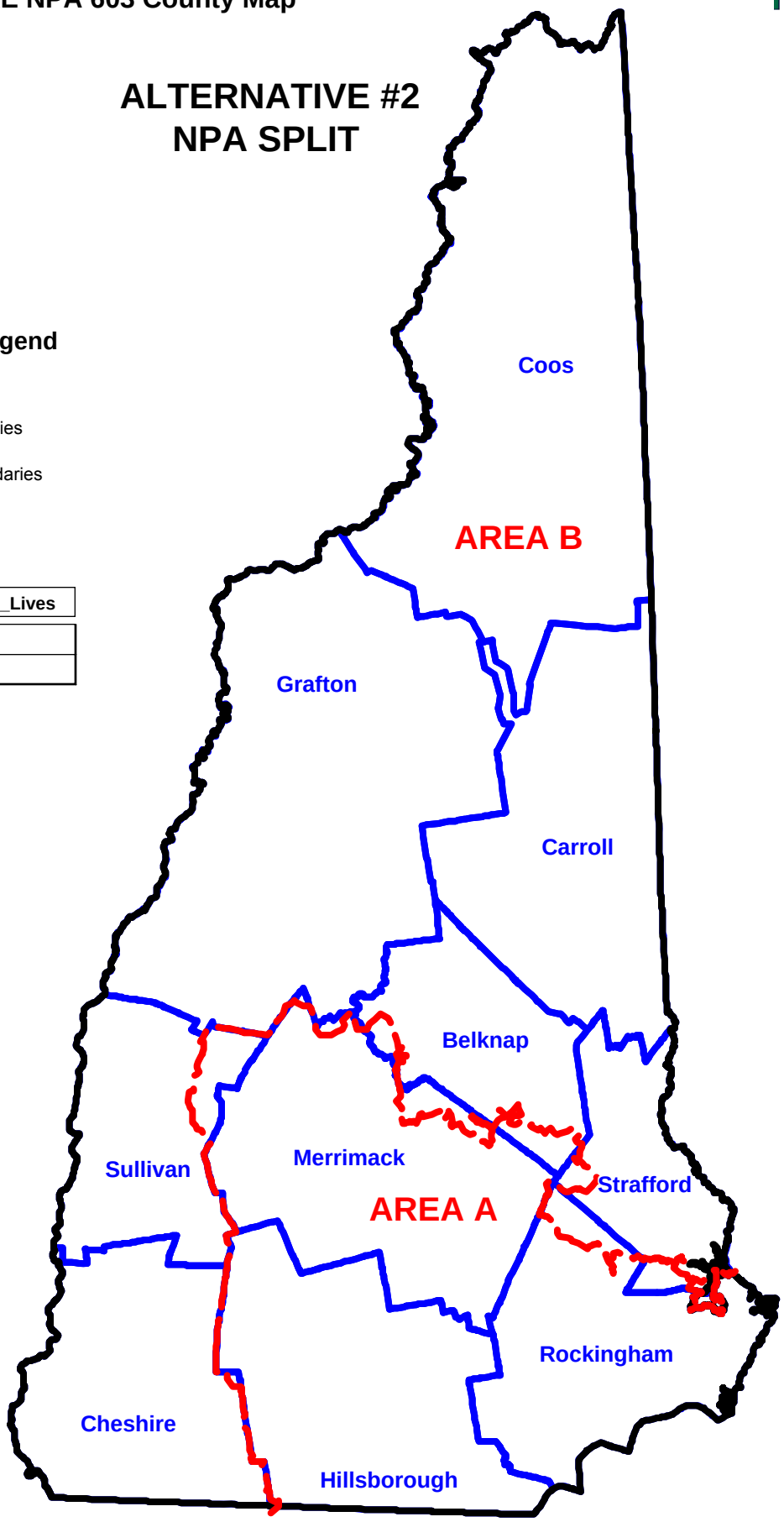
ALTERNATIVE #2
NPA SPLIT

NPA 603 Map Legend

- NPA Boundaries
- County Boundaries
- Split Line

Alt#2	Projected_Lives
Area "A"	25 Years
Area "B"	48 Years



Produced by CDS Business Mapping 04/2010

NEW HAMPSHIRE NPA 603 Rate Center Map

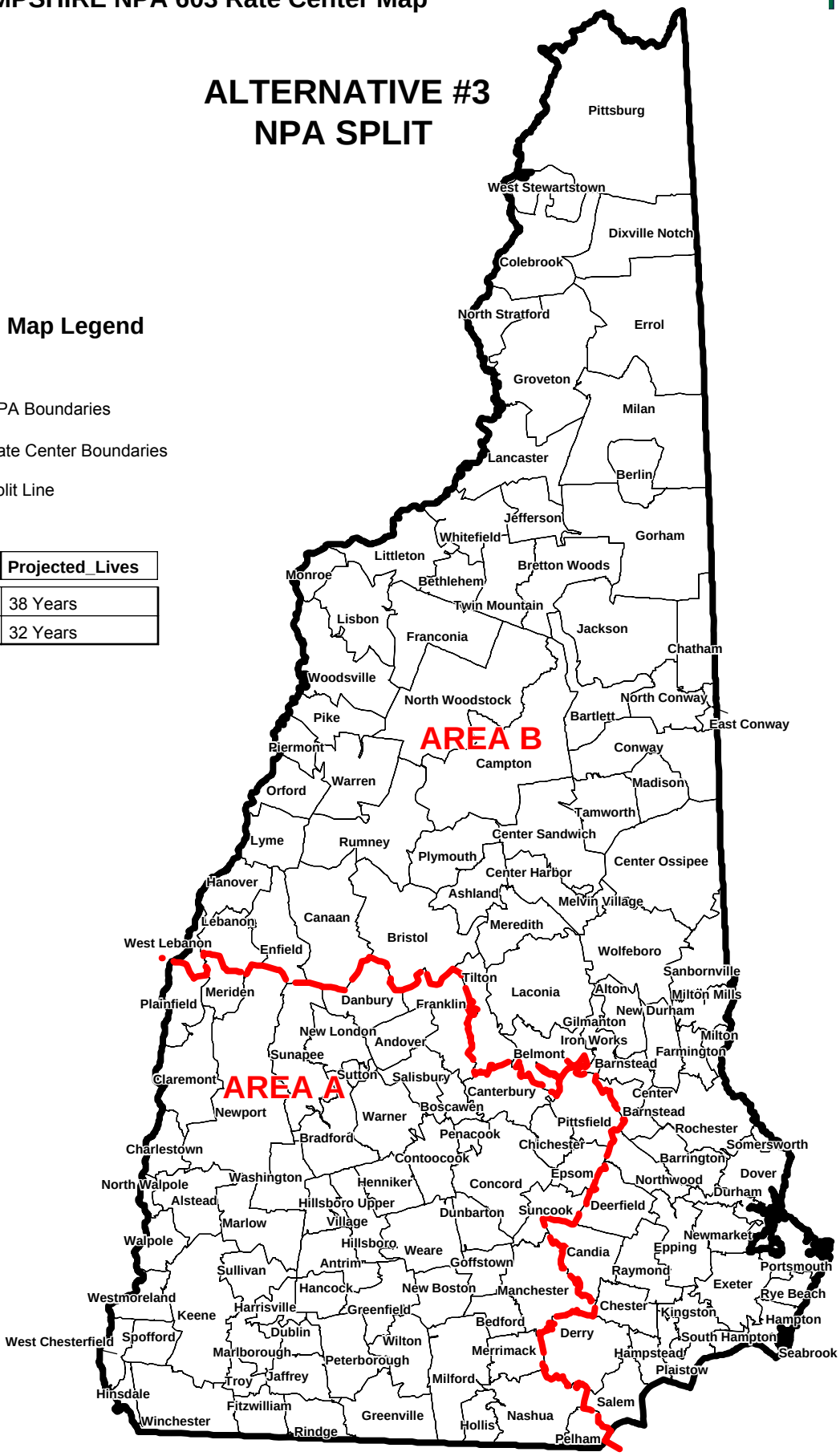
neustar

ALTERNATIVE #3
NPA SPLIT

NPA 603 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Alt#3	Projected_Lives
Area "A"	38 Years
Area "B"	32 Years



Produced by CDS Business Mapping 04/2010

NEW HAMPSHIRE NPA 603 County Map

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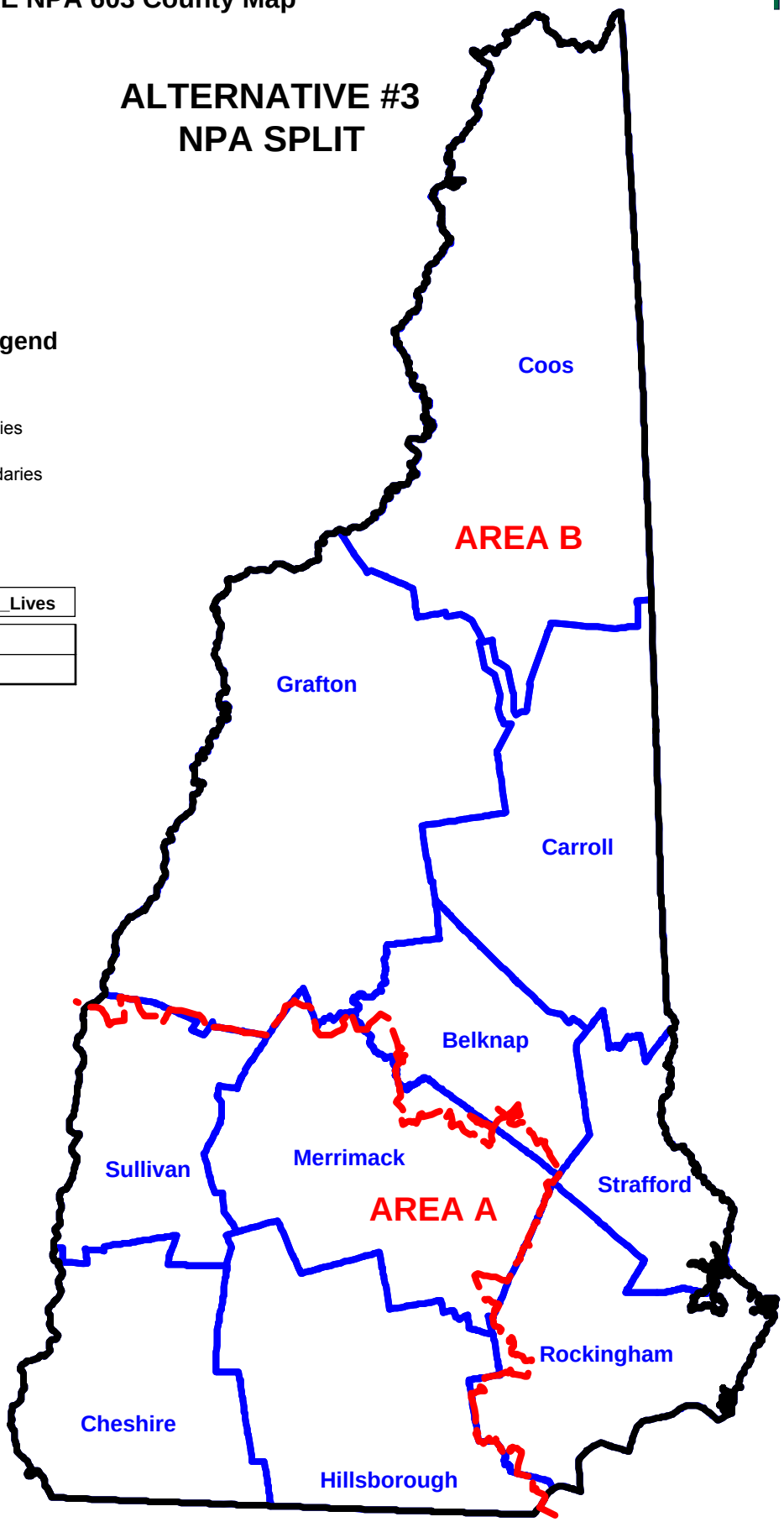
ALTERNATIVE #3
NPA SPLIT

NPA 603 Map Legend

- NPA Boundaries
- County Boundaries
- Split Line

Alt#3	Projected_Lives
Area "A"	38 Years
Area "B"	32 Years



Produced by CDS Business Mapping 04/2010

EXHIBIT B

STAMP & RETURN

MORRISON & FOERSTER LLP

ATTORNEYS AT LAW

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February 18, 1999

Writer's Direct Dial Number
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By Overnight Courier

Thomas B. Getz
Executive Director & Secretary
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7319

Re: Petition of the North American Numbering Plan Administrator on Behalf of the New Hampshire Telecommunications Industry

Dear Mr. Getz:

Enclosed for filing are an original and eight copies of the Petition of the North American Numbering Plan Administrator on Behalf of the New Hampshire Telecommunications Industry requesting approval of a relief plan for the 603 NPA. Also enclosed is a copy of the petition on diskette, formatted in Microsoft Word 6.0 with the exhibits formatted in Adobe Acrobat PDF. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope. Finally, an additional copy is being sent directly to the Office of the Consumer Advocate.

If you have any questions regarding this matter, please contact the undersigned counsel for the North American Numbering Plan Administrator, Lockheed Martin IMS.

Very truly yours,

Cheryl Tritt

cc: Barclay Jackson
William Homeyer (Office of Consumer Advocate)

dc-148867

STAMP & RETURN

Before the
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION
Concord, NH 03301

NANPA, on behalf of the New Hampshire Telecommunications Industry, Petition for Approval of NPA Relief Plan for the 603 NPA	Docket No. _____

PETITION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE NEW HAMPSHIRE TELECOMMUNICATIONS INDUSTRY

The North American Numbering Plan Administrator Lockheed Martin IMS ("NANPA"), in its role as the neutral third party NPA Relief Planner for New Hampshire under the North American Numbering Plan ("NANP") and acting on behalf of the New Hampshire Telecommunications Industry ("Industry"),[1] hereby petitions the New Hampshire Public Utilities Commission ("PUC") for approval of an overlay relief plan developed through Industry consensus for the 603 Numbering Plan Area ("NPA").[2] Based upon demand projections submitted by the Industry, it is estimated that without NPA relief, the supply of central office ("CO") codes for the 603 NPA will exhaust during fourth quarter 2000. Industry participants reached consensus on January 7, 1999 to recommend to the PUC an all services overlay for the entire geographic area encompassed by the 603 NPA as

[1] The Industry is comprised of current and prospective telecommunications carriers operating in or considering operations within the state of New Hampshire.

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

the most suitable relief plan.[3] In order to allow sufficient time to implement the relief plan submitted for approval, the NANPA, on behalf of the Industry, requests that the PUC consider the Petition on an expedited basis.[4] In support of this Petition, the NANPA submits the following:

I. BACKGROUND

The 1998 Central Office Code Utilization Survey ("COCUS") projections for CO codes indicate that the 603 NPA will be exhausted during the fourth quarter of 2000. To allow sufficient time to prepare for NPA relief to prevent number exhaust, the NANPA notified all affected industry members and the appropriate regulatory bodies that NPA relief planning needed to be addressed. The Industry met on November 19, 1998 in Manchester, New Hampshire to discuss relief alternatives.[5] Pursuant to the Guidelines, the NANPA presented an Initial Planning Document ("IPD") at the meeting.[6] The IPD suggested three relief alternatives and a fourth alternative, an expanded overlay, was proposed during the meeting. Industry consensus regarding the four alternatives was not achieved at the initial

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[3] In order to plan for the introduction of new area codes, the NANPA and the Industry utilized the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016) ("Guidelines"). The Guidelines assist the NANPA, the industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

[4] The Industry estimates that implementation of the relief plan will require 12 to 18 months.

[5] Minutes of the meeting, including a list of attendees, are attached hereto as Exhibit A.

[6] *See* Attachment 2 of Exhibit A.

meeting, and a second meeting was held on January 7, 1999.[7] The information furnished by the NANPA to the participants during the November and January meetings included geographical maps of the 603 NPA, a description of each relief alternative including dialing requirements and the projected life in years of the relief alternatives.[8] At the January 7, 1999 meeting, the participants discussed the various relief alternatives, eliminated three such alternatives consisting of two geographic split options and an expanded overlay option, and eventually reached consensus to recommend an all services area code overlay to the PUC.

II. DESCRIPTION OF THE PROPOSED ALL SERVICES AREA CODE OVERLAY RELIEF PLAN

The all services overlay alternative would overlay a new area code on the same geographic area covered by the existing 603 NPA.[9] All existing customers would retain the 603 area code and number changes would not be required for existing customers. When the 603 NPA exhausts, all code assignments will be made in the new overlay area code.

III. CONCLUSION

In light of the anticipated fourth quarter 2000 exhaust of the 603 NPA, available data regarding NXX usage in the 603 NPA, and the 12 to 18 months estimated time required for implementing area code relief, the Industry respectfully requests that the PUC issue a

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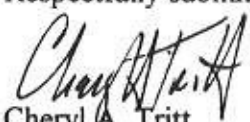
[7] Minutes of this subsequent meeting, including a list of attendees, are attached hereto as Exhibit B.

[8] Two different growth assumptions were used to project the life of the relief alternatives. The first assumption is based on the premise that code growth will continue in a straight-line direction at the current rate of assignment. The second assumption is based on the premise that growth will continue in a straight-line direction at the current rate of assignment through the end of fourth quarter 2000, and then will be reduced by 50% to reflect the estimated impacts of number conservation efforts such as number pooling.

[9] A map of the 603 NPA and new area code overlay is attached hereto as Exhibit C.

decision providing for area code relief by June 1, 1999. Because the NANPA does not have additional or different information to submit to the PUC from that provided in the instant Petition, the NANPA is not submitting written testimony at this time. The NANPA, of course, will cooperate fully if the PUC later requires the submission of written testimony.

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 Lockheed Martin IMS

EXHIBIT A

MEETING MINUTES OF THE
NEW HAMPSHIRE 603 NPA RELIEF PLANNING INDUSTRY MEETING
Thursday November 19, 1998 – Manchester, New Hampshire

WELCOME AND INTRODUCTIONS

This meeting was a continuation of the jeopardy meeting in the morning and introductions were not required. Please see attachment #1for the names of those who were invited to the meeting, those who attended and the agenda.

REVIEW OF INDUSTRY GUIDELINES

Pamela stated that the purpose of the meeting was to come to consensus on a single NPA relief plan to submit to the Commission for consideration. She reviewed Sections 1 through 12 of the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016; Issued 4/4/97) which participants were requested to bring with them. This document can be obtained from the internet; the website address is www.*atis.org/atis/clc/inc/incdocs.htm*.

Due to the omission by NANPA of all thirteen independent telephone companies from the invitation to the meeting, it had been agreed during the jeopardy meeting that any consensus decisions would only be a tentative consensus by the companies present and final industry consensus could not be determined until the next meeting on January 7, 1999.

INITIAL PLANNING DOCUMENT

Each section of the Initial Planning Document (IPD) that was prepared and distributed prior to the meeting was reviewed. See attachment # 2. Pamela pointed out that grandfathering, Type IIA Lives in the IPD, was analyzed and included in the initial planning document because this has been ordered in other states. Pamela reviewed the maps for each relief alternative and described the location of the boundary lines as being near County lines for each split alternative.

ADDITIONAL ALTERNATIVES PROPOSED

Pamela sought proposals from the industry for additional alternatives. Omnipoint presented an expanded overlay option, see attachment # 3.

ELIMINATION OF ALTERNATIVES

At the request of an industry member, several participants gave their view of the status of overlays vs. splits around the country and the attributes they felt were beneficial of each.

A proposal was made to eliminate all split alternatives (#2 & #3) No consensus to eliminate

A proposal was made to eliminate the overlay alternatives. No consensus.

A proposal was made to eliminate Alternative # 4 because of jurisdictional issues, i.e. multi-state, it does not specifically address relief in New Hampshire, and has extremely short life. Tentative consensus was reached to eliminate this alternative.

A proposal was made to eliminate alternative # 3b due to unbalanced lives. Tentative consensus reached to eliminate this alternative.

Statement for the record from Omnipoint

Proposed Relief

Omnipoint proposes relief by an Expanded NPA Overlay that would be defined by the geographic boundaries of the New Hampshire Major Trading Area (MTA #8)

The Expanded NPA Overlay is one of the NXX relief mechanisms NANC (North American Numbering Council) forwarded to the FCC as an acceptable relief alternative.

Statement for the record from the Dunbarton Telephone Company, Granite State Telephone Company, MCT Telecom and Union Telephone Company

Due to the omission by NANPA of all thirteen independent telephone companies in New Hampshire from the notification list for the 603 – NPA New Hampshire Relief Industry meeting held on November 19, 1998 at the executive Court Conference Center in Manchester, New Hampshire, only four (4) of the companies are present at the meeting. Even those four companies had only one day's notice of the meeting and are not in a position to vote meaningfully on any consensus issue.

Accordingly, the four representatives of independent telephone companies who are present, namely Beth Osler of MCT Telecom, Karen Doughty of Union Telephone Co., Richard Wood of Granite State Telephone Co., and Stephen Nelson of Dunbarton Telephone Co., formally object to all positions put forth for consensus. This action is taken solely to allow appropriate time to review any such issues and develop company positions. These objections should not be viewed as firm or final, but rather subject to reconsideration until such time as the promised follow-up meeting or conference call to finalize the industry consensus process takes place.

It is also the understanding of the four parties identified above that the follow-up meeting or conference call will provide an opportunity for the independent telephone companies who were unable to attend the November 19th meeting because of the notification oversight will be given the opportunity to participate in the consensus process as full participants and that the reported results of that process will reflect that participation a though they had been included initially.

Statement for the record from the NHPUC Staff

The NHPUC Staff recognizes that the 603 area code is in jeopardy in large part because NXX #'s are used inefficiently. We strongly encourage the industry to take adequate conservation measures in order to enable New Hampshire to take advantage of evolving technology which could result in the preservation of the 603 area code.

NEXT MEETING

Consensus was reached to have a face to face meeting on January 7, 1998. The meeting will be held at the Executive Court Conference Center located at 1199 South Mammoth Road, Manchester, New Hampshire 03109. The telephone number is (603) 626-4788.

The Commission stated they would have a meeting before January 7, 1998 and everyone would be invited. No specific date was given.

603 NPA NEW HAMPSHIRE RELIEF INDUSTRY MEETING
Thursday, November 19, 1998

Executive Court Conference Center
1199 South Mammoth Road, Manchester, New Hampshire 03109
(603) 626-4788

8:30	Registration
9:00	Welcome and Introductions
9:10	NANPA Transition Update
9:20	Minutes and "Statements For The Record"
9:25	Industry Guidelines
9:35	Review Initial Planning Document
10:15	Break
10:30	Review Initial Planning Document
11:00	Additional Alternatives from Industry
11:45	Lunch (On Your Own)
12:45	Elimination Of Alternatives
1:00	Consensus On Relief Alternative
2:15	Consensus on Dialing Plan
2:30	Break
2:45	Consensus on Implementation Intervals
3:15	Industry Commitment For Test Number
3:30	Consensus on NANPA Filing Industry Efforts With Commission
3:40	Set Date For Conference Call To Approve Minutes
3:45	Complete NANPA Survey
4:00	Adjourn

Attachment #1

Unid	Last Name	First Name	Company	Phone	Fax
	Acker	Dennis	Southeast Telephone Company	414-534-3998	414-534-3999
	Adair	Bill	Southwestern Bell	913-676-1539	913-676-1102
	Addicks	Stephen	MCI Metro	703-394-7202	703-918-6617
	Alberico	David	All Florida Paging	800-815-0216	407-260-5823
x	Alexander	Donna	Omnipoint	401-888-5704	401-574-4373
	Allen	Gordon	GTE Communications Corp.	972-714-0244	800-483-5559
	Andreasi	Steven	TCG - Milwaukee		
	Atkins	Jim	Vitts Corporation	603-656-8001	603-656-8100
x	Bailey	Kate	New Hampshire Public Utilities Co	603-271-6024	603-271-3878
	Bates	Wayne	Public Service Commission of KY	502-564-3940	502-564-1582
	Beary	James	Porta-Phone Paging	850-841-7100	850-561-8996
	Benfield	Gail	MCI WorldCom	214-561-3667	214-749-4508
	Bennett	Mary	Radiofone, Inc.	504-837-8330	504-831-7859
	Blackburn	Karen A.	PrimeCo Personal Communication	904-348-3623	904-348-3618
	Bonnstetter	Trevor	West KY Rural Telephone Co.	502-674-1000	502-856-3651
	Borislow	Daniel	Tel-Save, Inc.		
	Brooks	Suzanne	MCI World Com	972-656-1430	972-656-1499
	Bumgarner	Jack	Central Wireless Partnership	209-440-0164	209-440-0297
x	Cort	Alan	Bell Atlantic	603-645-3693	603-641-1678
	Craig	Ellen	USN Comm. Long Distance Co.	312-906-3802	312-559-8388
	Davenport	Olivia	AT&T	816-995-4083	816-995-2488
	Davis	Dean	Vista United Telecommunications	407-827-2115	407-827-2128
	Day	Steven	Metrocall	703-660-6677	703-765-4385
	Del Vecchio	Victor	Bell Atlantic	617-743-2323	617-737-0648
	DeSisto	Thomas	Bell Atlantic	617-743-5785	617-743-4833
	Dingwall	Craig D.	Sprint Communications	202-828-7447	202-828-7403
x	Doughty	Karon	Union Telephone	603-859-3700	603-859-9985
x	Downs	Jena	Bell Atlantic	410-736-6711	410-736-6066
	Duane	Jennifer	Sprint Comm. Company L.P.	202-828-7422	202-828-7403
x	Faul	Kelly	MCI WorldCom	703-918-0457	703-918-6814
	Fry	John	AT&T Communications of NY, Inc.	212-387-4722	212-387-4770
	Fuglie	Paul	GTE Communications Corporation	972-717-8371	972-717-8463
	Gallagher	Jo	Bell Atlantic	703-974-8160	703-974-0616
	Go	Richard	360° Communications	773-399-2333	773-399-7201
	Goodearl	Donald	Digital Signal Communications, Inc		
	Handley	Cathy	PCIA	703-739-0300	703-836-1608
	Hart	Mary	New Hampshire Public Utilities Co	603-271-6016	603-271-3878
x	Healy-Wurm	Jill	Bell Atlantic	603-645-2606	603-641-1678
	Hiltz	Cara	Hyperion Telecommunications	412-220-5083	412-220-5164
	Holmes	Michael	Office of Consumer Advocate		
	Homeyer	William	N.H. Office of Consumer Advocate	603-271-1175	603-271-1177
	Hopson	Pat	360° Communications	773-399-2419	773-399-7201
	Hoskins	Anne	Bell Atlantic Mobile	973-622-4444	973-624-7070
x	Jackson	Barclay	N.H. Public Utilities Commission	603-271-2431	603-271-3878
	Kay	Karen	Level 3 Communications	303-926-3256	303-926-3456
	Keithley	Jay C.	Sprint Communications		
	Kenworthy	Pamela	Lockheed Martin-NANPA	973-267-7812	973-267-7921
	Kestenbaum	Leon	Sprint Communications		
x	Kimberlin	Tony	Bell Atlantic	410-736-7823	410-736-6066
	Kittrick	Kathleen	Vanguard Cellular Systems, Inc.	717-319-4446	717-579-4060
	Kizzee	Cheryl	MCI WorldCom	972-561-5094	214-749-4508
	Krug	John F.	Teleport Comm.	718-355-2762	718-355-4804
	Kuhnow	Carol	LCI International	703-848-4466	703-848-4404
	LaQuiere	Jerry	LEC-LINK		
x	Livingston	Forest	New Hampshire Public Utility Com	603-271-6326	603-271-3878
	Louie	Cecilia	Lockheed Martin	925-363-8708	925-363-8714
	Lutz	Mary Anne	New Hampshire Public Utilities Co	603-271-2433	603-271-3878

Attachment #1

Init	Last Name	First Name	Company	Phone	Fax
	Lyle	Tom	N.H. Public Utilities Commission	603-271-6038	603-271-3878
x	MacGillivray	Jeffrey		603-878-4251	603-878-1000
x	Manager	Telecom	Bretton Woods Telephone Co.	603-278-9911	603-278-9913
x	Manager	Telecom	Contoocook Valley Telephone Co.	603-464-9911	603-746-3567
x	Manager	Telecom	Dixville Telephone Co.	603-255-3400	603-255-4670
x	Manager	Telecom	Wilton Telephone Company	603-654-9911	603-654-9901
x	Manager	Telecom	Hollis Telephone Co.	603-465-9911	603-654-9901
	Marotta	Julie	XCOM Technologies	617-696-6841	617-500-0001
	McCarthy	Angela	MapMobile Communications	757-424-1191	757-578-4963
	McClenan	Ron	Excel Comm., Inc.	214-863-8304	214-863-8307
	McGee	Thomas	AT&T	770-785-5872	770-929-4348
	McNaught	Ted	Northeast Paging	207-856-0078	207-854-0887
	Milby	Wayne	Lockheed Martin-NANPA	804-795-5919	804-795-5514
	Mocas	Robert	Easton Telecom Services	330-659-6700	330-659-9379
x	Munnelly	Robert	New England Cable TV Associatio	781-843-3418	781-849-6267
x	Nelson	Stephen	Dunbarton Telephone Co.	603-774-9911	603-774-4002
x	Nestor	John	Bell Atlantic	617-743-8880	617-743-4830
	Newman Hirsch	Claudia	Quintelco, Inc.	914-620-1212	914-620-1717
	Noonan	Amanda	N.H. Public Utilities Commission	6033-271-2431	603-271-3878
x	Osler	Beth	MCT Telecom	603-746-9258	603-746-3567
x	Parker	Stacey	MediaOne	978-683-5500	978-683-7057
	Patch	Douglas	N.H. Public Utilities Commission	603-271-2442	603-271-3878
x	Patrick	Blaine	New England Voice Data	603-472-5220	401-854-2350
x	Perry	David	Bell Atlantic Mobile	781-932-1535	781-932-9065
x	Phillips	Bubba	AT&T Long Distance	770-785-5773	770-929-4348
	Pierpont	Laura	Bell Atlantic	410-736-6547	410-736-6066
x	Rappoport	Bruce	Bell Atlantic Mobile	908-306-7862	908-306-7731
	Reinhart	Roger A.	AT & T Wireless Services	201-986-7306	
	Renna	Diane	AT&T Local	908-234-7347	908-719-7246
	Rogers	Ken	360° Communications	773-399-5381	773-399-2536
	Rooney, Jr.	William	Global NAPS	617-350-0100	617-426-5251
x	Rush	Eileen	Bell Atlantic	617-743-3296	617-743-4830
	Rutledge	Tene	Teligent Inc.	703-762-5532	703-288-5643
	Sanders	John	Preferred Networks, Inc.	770-582-3723	770-734-0936
x	Schmidt	Ellen	MediaOne	978-683-5500	978-683-7057
x	Sirignano	Tony	Bell Atlantic Mobile	781-932-1209	781-932-9065
	Sousa	Barbara Anne	Bell Atlantic	617-743-7331	617-737-0648
	Souza	Robert. J.	Saco River Telegraph & Tele. Co.	207-929-9941	207-929-6262
	Stallworth	Sharon	KMC	908-719-2200	908-719-2211
	Szilagyi	Rick	Freedom Ring dba Bay Ring Com		
	Telecom	Manager	Metracom		
	Telecom	Manager	Business Long Distance Inc.		
	Telecom	Manager	Dial & Save		
	Telecom	Manager	Frontier Communications of the W		
	Telecom	Manager	Group Long Distance Inc.		
	Telecom	Manager	ICG Telecom Group		
	Telecom	Manager	LDM Systems Inc.		
	Telecom	Manager	Lightship Telecom		
	Telecom	Manager	Winstar Gateway Network Inc.		
	Telecom	Manager	Massachusetts Wholesale Telepho		
	Telecom	Manager	MFS Intelenet Inc.		
	Telecom	Manager	North American Telephone Networ		
	Telecom	Manager	NE Voice & Data		
	Telecom	Manager	Network Plus		
	Telecom	Manager	St. Long Distance		
	Telecom	Manager	Third Rail Wireless Services, Inc.		
	Telecom	Manager	Comm South Companies Inc.		

Attachment #1

Initial	LastName	FirstName	Company	Phone	Fax
	Telecom	Manager	US West Interprise of America, Inc.		
	Tirador	Judy	Omnipoint Communications	973-290-2411	973-290-2445
	Walker	Jeffrey	Preferred Carrier Services, Inc.	972-503-3388	972-503-3385
X	Walls	Myra	Bell Atlantic	410-736-6035	410-736-6066
	Webster	Angela	Sprint	913-624-6016	913-624-5504
	Wieners	Paul	CTC Communications	781-466-1231	781-466-1263
x	Wood	Richard	Granite State Telephone	603-529-6240	603-529-1020
	Yahemiak	Jack	Brooks/WorldCom	207-228-1010	207-761-9941

Initial Planning Document

For Relief of New Hampshire: 603 NPA

North American Numbering Plan Administration

Prepared by: Pamela Kenworthy
NPA Relief Planner

November 19, 1998

603 NPA Relief Alternatives

Overlay Alternative

A new NPA code would be assigned to the same geographic area as the existing 603 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing 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 603 NPA all code assignments will be made in the overlay area code.
Total codes at Exhaust = 749
Area code life in years = 6.2 to 12.4

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

Merrimack, Hillsborough & Rockingham Plan – Assumption #1
Split boundary line runs along rate center boundaries on top of these three county boundary lines.

Some of the larger exchanges include:

Area A	Manchester	Nashua	Merrimack

Total codes at Exhaust = 399
Area code life in years = 5.5 to 11.1

Area B	Dover	Portsmouth	Laconia

Total codes at Exhaust = 350
Area code life in years = 7.0 to 13.9

Alternative # 3

Sullivan, Merrimack, Cheshire & Hillsborough Plan – Assumption #1
Split boundary line encompasses four counties and runs along rate center boundary.

Some of the larger exchanges include:

Area A	Manchester	Nashua	Merrimack

Total codes at Exhaust = 353
Area code life in years = 7.0 to 13.9

Area B	Dover	Portsmouth	Laconia

Total codes at Exhaust = 396
Area code life in years = 5.6 to 11.1

NEW HAMPSHIRE 603 NPA ALTERNATIVES

PROJECTED LIFE OF RELIEF ALTERNATIVES IN YEARS

REGULAR LIVES

	Assumption #1		Assumption #2	
Alternative	**Area A**	**Area B**	**Area A**	**Area B**
#1	6.2		12.4	
#2	5.5	7.0	11.1	13.9
#3	7.0	5.6	13.9	11.1

TYPE IIA LIVES

	Assumption #1		Assumption #2	
Alternative	**Area A**	**Area B**	**Area A**	**Area B**
#1	6.2		12.4	
#2a	5.2	7.4	10.4	14.8
#2b	6.1	6.3	12.3	12.6
#3a	6.5	6.0	12.9	12.0
#3b	7.5	5.0	15.1	10.0

Assumption # 1 - Code growth continues at 4Q1998 to 4Q2000 levels
Assumption # 2 - Code growth reduced by 50% beyond 4Q2000

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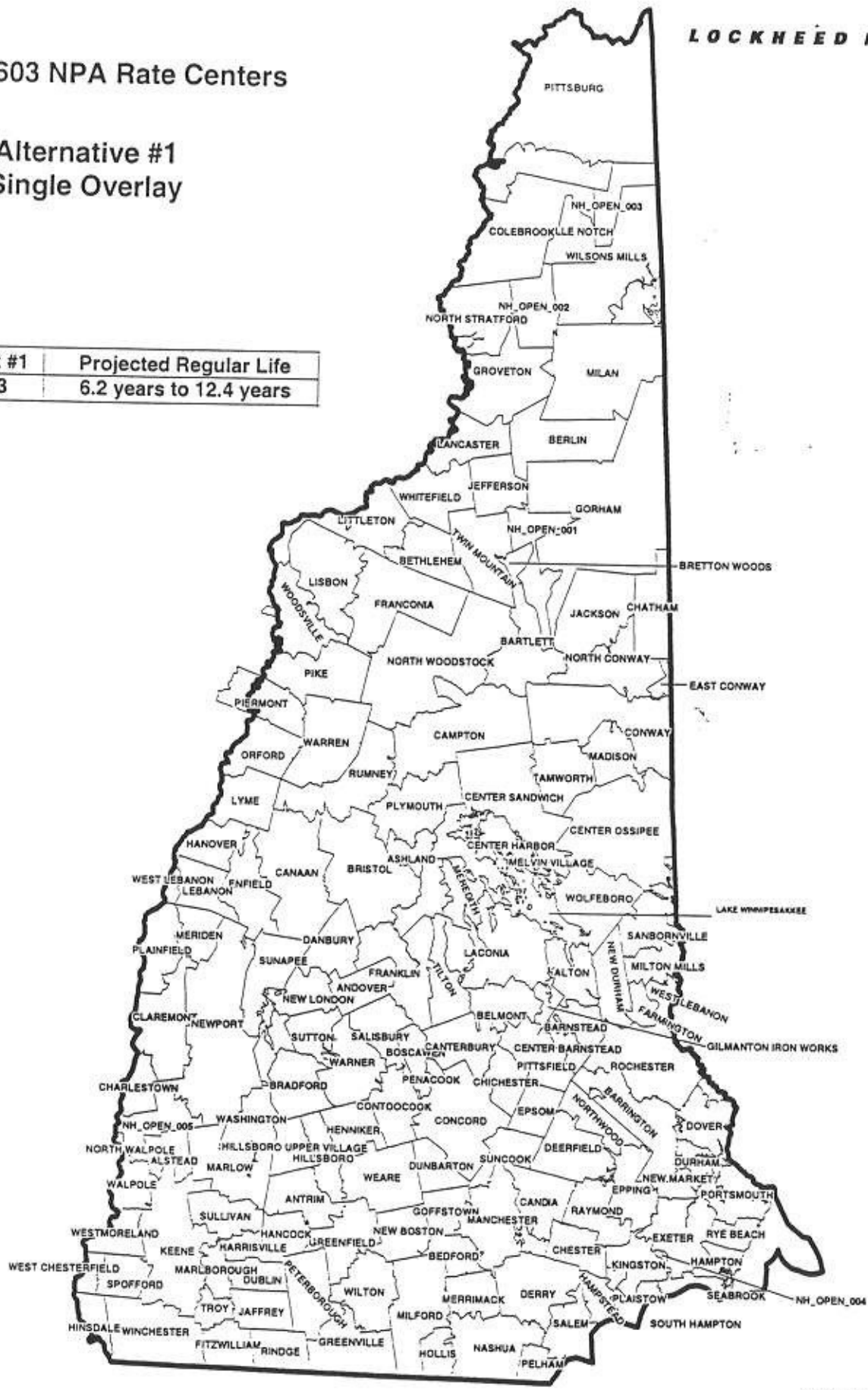
603 NPA Rate Centers

Alternative #1
Single Overlay

Alt #1	Projected Regular Life
603	6.2 years to 12.4 years



NPA Boundary

Rate Center Boundaries

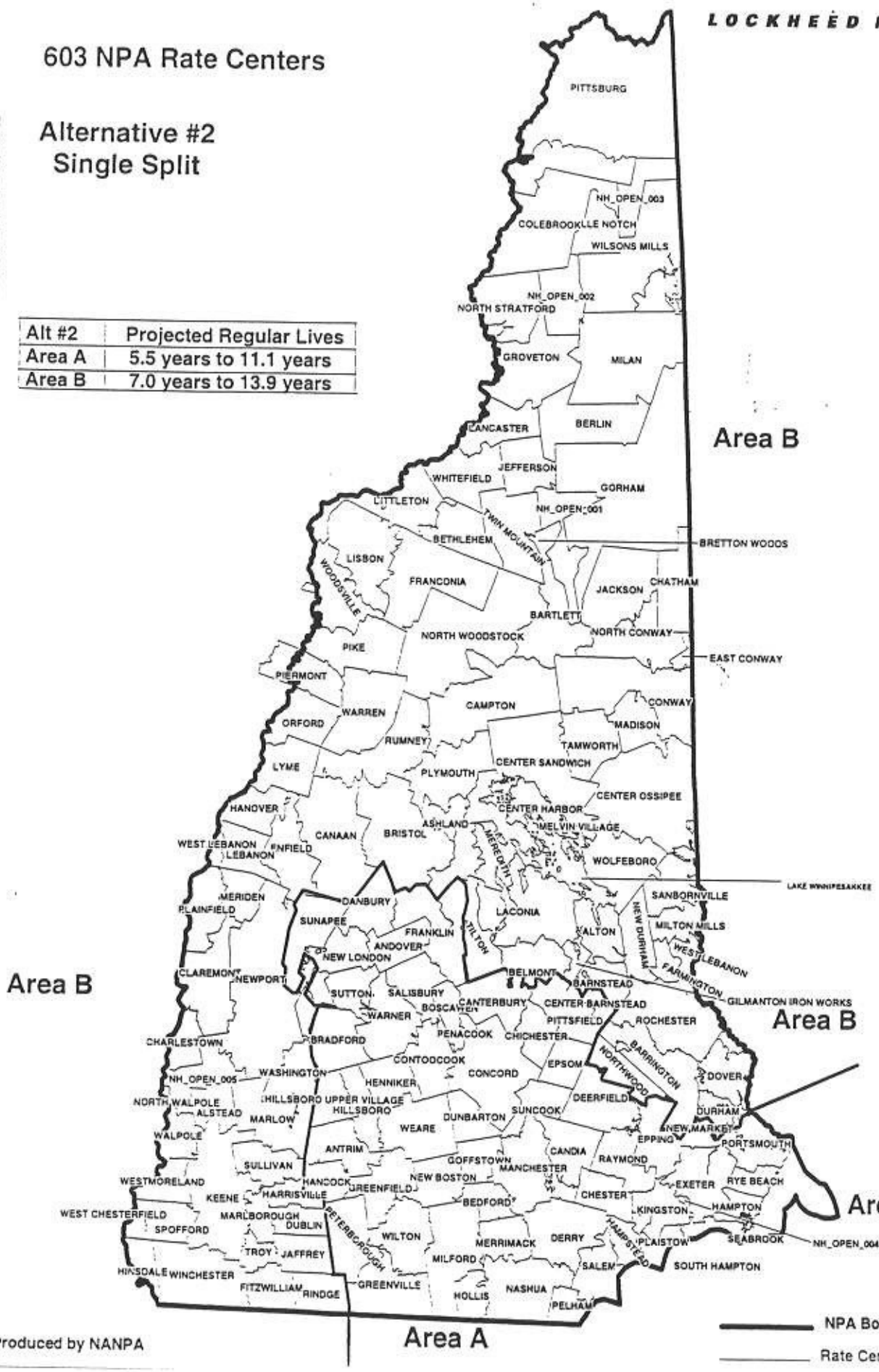
Produced by NANPA

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #2
Single Split

Alt #2	Projected Regular Lives
Area A	5.5 years to 11.1 years
Area B	7.0 years to 13.9 years



Produced by NANPA

NPA Boundary

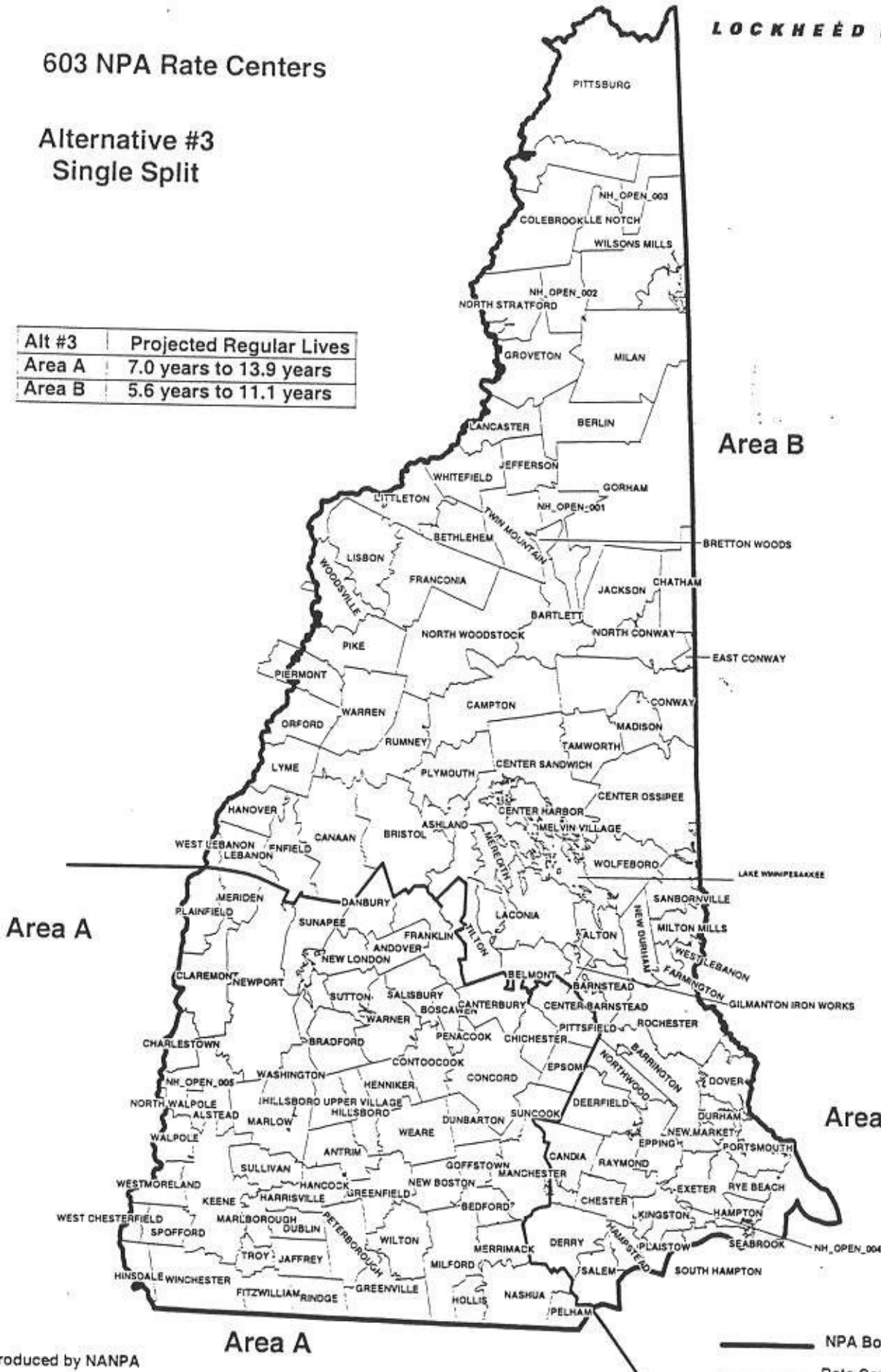
Rate Center Boundaries

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #3
Single Split

Alt #3	Projected Regular Lives
Area A	7.0 years to 13.9 years
Area B	5.6 years to 11.1 years

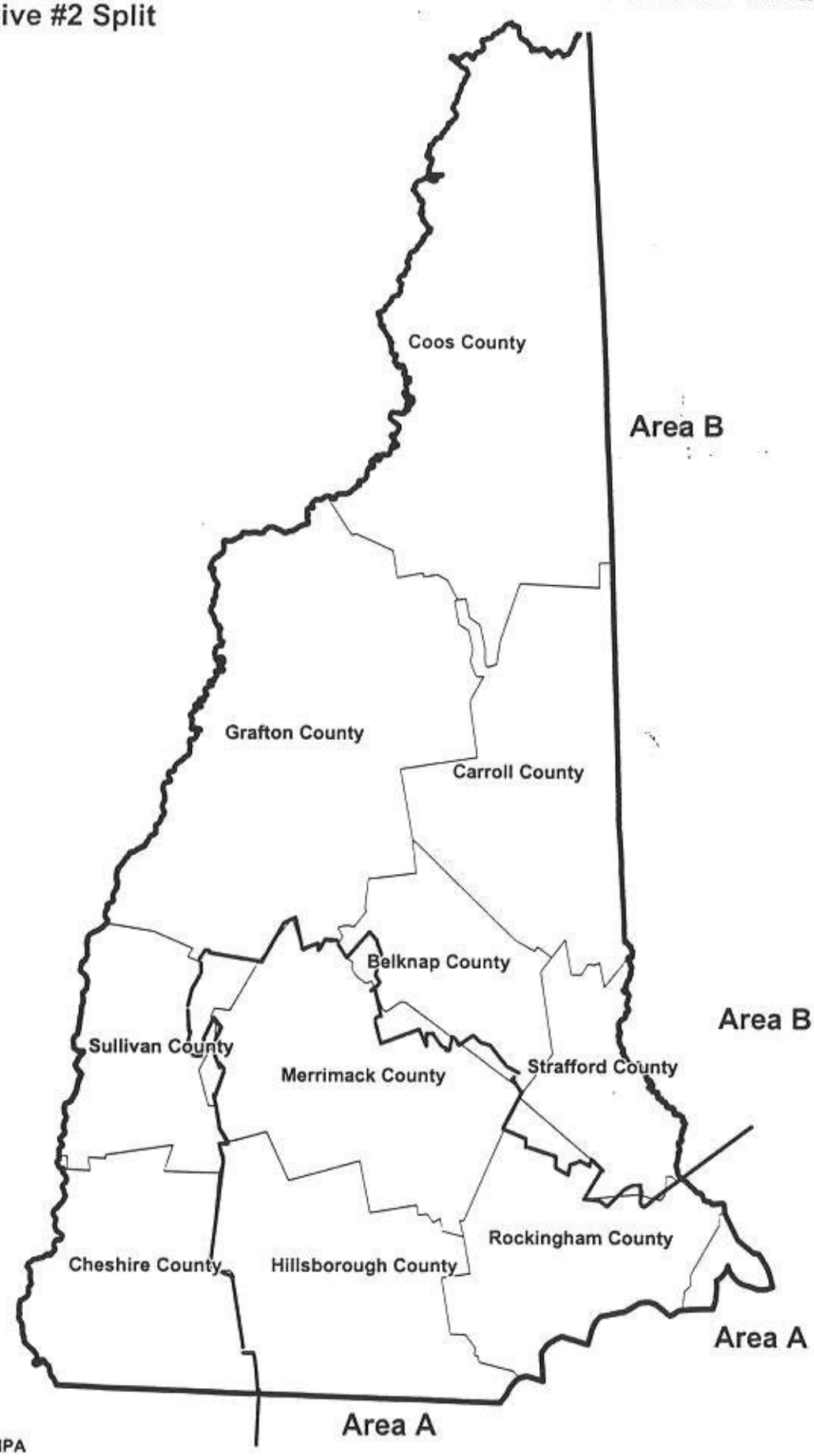


Produced by NANPA

603 NPA County Boundaries
Alternative #2 Split

Attachment #2

LOCKHEED MARTIN

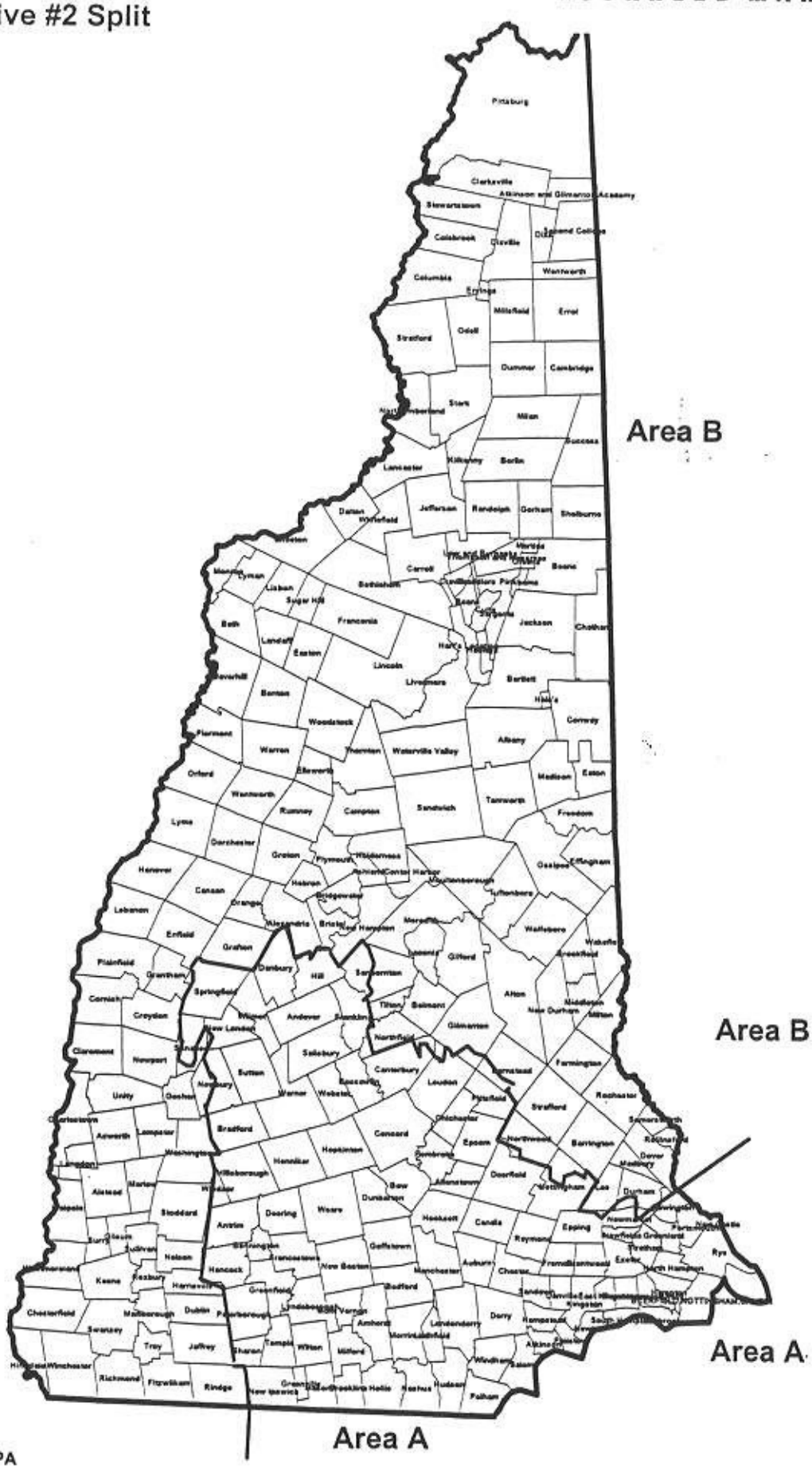


Produced by NANPA

603 NPA Municipal Boundaries
Alternative #2 Split

Attachment #2

LOCKHEED MARTIN



Produced by NANPA

603 NPA County Boundaries
Alternative #3 Split

Attachment #2

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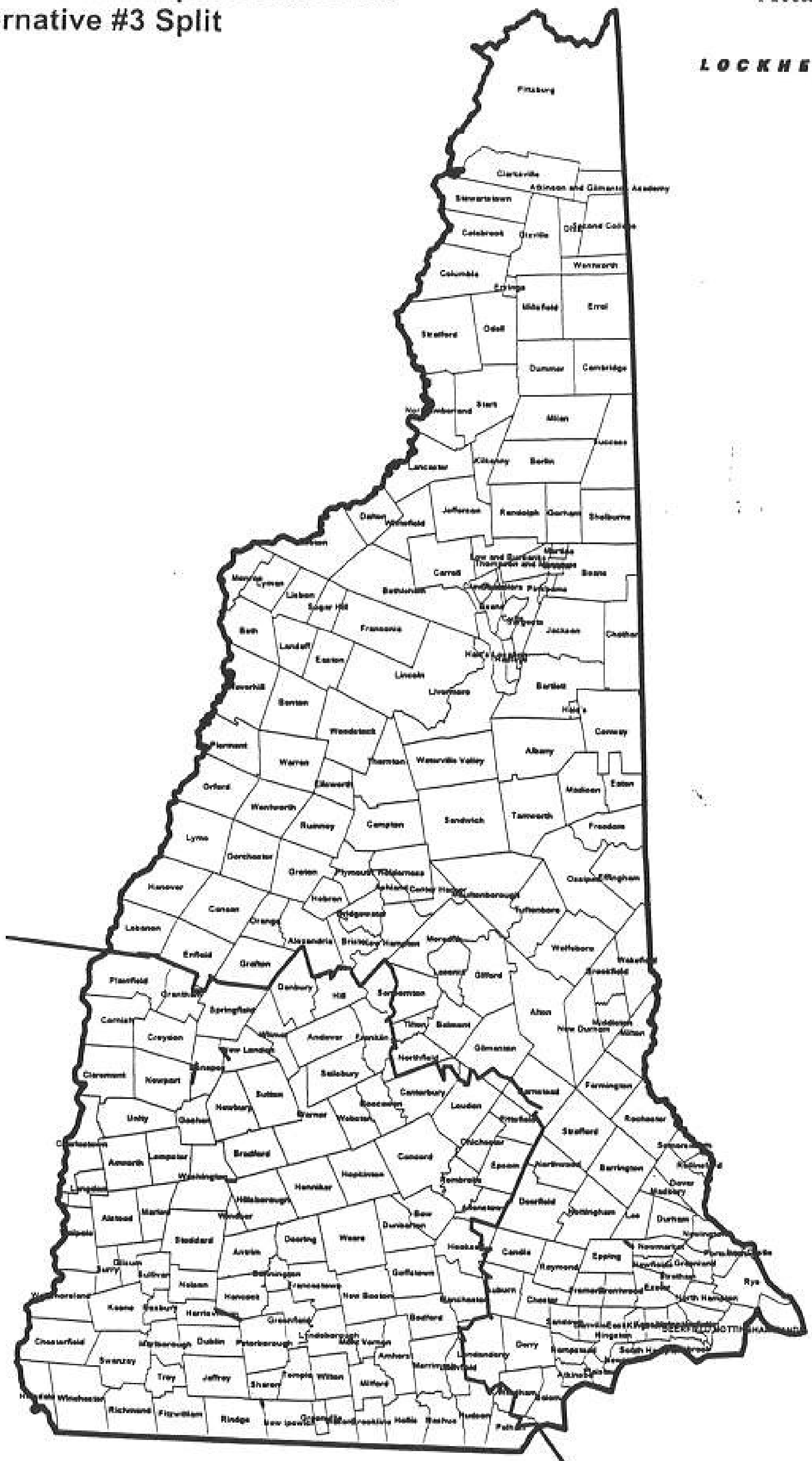
Produced by NANPA

603 NPA Municipal Boundaries
Alternative #3 Split

Attachment #2

LOCKHEED MARTIN



Produced by NANPA

Janet Nanos
Regulatory Coordinator, Legal & Regulatory Affairs

OMNIPOINT COMMUNICATIONS SERVICES, LLC
16 Wing Drive, Cedar Knolls, New Jersey 07927
973 290-2513 Fax: **973 290-2445**

November 19, 1998

RE: New Hampshire, NPA 603 Initial Planning Document Relief Method

Due to the recent forecasts indicating that the 603 NPA in New Hampshire will exhaust, Omnipoint Communications proposes an Expanded NPA Overlay as a relief method. This type of relief method has been recommended by the Carrier Liaison Committee (CLC) as an acceptable Short-term Technical Alternative to NXX Exhaust, and endorsed by North American Numbering Council (NANC) to the Federal Communications Commission.

The Expanded NPA Overlay method is defined as an overlay covering a group of Basic Trading Areas (BTAs) or a Major Trading Area (MTA). In this instance, Omnipoint recommends an Expanded NPA Overlay be adopted to cover the New Hampshire Major Trading Area (MTA #8) which include the following 14 BTAs: 363, 465, 030, 251, 357, 249, 274, 227, 351, 427, 480, 051, 364 and 201.

Omnipoint supports the Expanded NPA Overlay method due to the reduction and the elimination of the need for customer number changes like those required under a geographic split. The method also allows expedited implementation by eliminating the permissive dialing as part of the implementation of the relief method.

Omnipoint would also support any recommendation by the NANPA or State of New Hampshire to the FCC that implementation of an Expanded NPA Overlay not trigger a mandatory ten-digit intra- NPA dialing requirement in either the existing NPAs or the new overlay. Omnipoint believes that the ten-digit dialing requirement was premised on traditional overlays covering single NPAs and did not envisage the non-traditional nature of the Expanded NPA Overlay.

Omnipoint is also providing the following:

1. A map of the New Hampshire MTA.
2. A copy of the CLC Report, revised October 31, 1997, "Short-term Technical Alternatives to NXX Exhaust."

Sincerely,

Janet Nanos

Janet Nanos
Legal & Regulatory Affairs

New Hampshire Major Trading Area (MTA) 8

Carrier Liaison Committee (CLC) Report to the North American Numbering Council (NANC)

Short-term Technical Alternatives to NXX Exhaust

The Report as Presented on July 22, 1997 to NANC and Revised October 31, 1997

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At the September 23, 1997 North American Numbering Council (NANC) meeting, the NANC discussed conveying the Carrier Liaison Report (CLC) to the NANC on Short-term Technical Alternatives to NXX Exhaust to the FCC. As a result, the following statement was developed and agreed to by the NANC concerning the CLC Report presented to the NANC pursuant to a request by the NANC.

The CLC agreed to include this preface in the Report.

"There is no reference in the report to NPA splits; the procedures and utility of splits have been in use for many years and are well known. This report should not be construed to favor any relief procedure over another including NPA splits and overlays.

The NANC believes that national standards other than those already in existence (and as modified from time to time) are not necessary in the case of NPA Splits, Rate Center Consolidations, NPA Overlays, Extended NPA Overlays and Extended Local Calling Areas. NANC believes that state regulatory commissions, working with interested parties. including carriers, are in the best position to judge the relative utility of these methods in their own individual circumstances.

NXX-X Location Routing Number (LRN) and Unassigned Number Porting alternatives are being reviewed and developed in several states. NANC has found that NANP-wide, uniform standards for number pooling are required. Therefore, these alternatives will also be incorporated and reviewed as part of the NANC's efforts to review and reach a conclusion on the utility and utilization of number pooling and thus it is premature to endorse these alternatives. The NANC will strive to assure that number pooling activities are brought to conclusion in the most expeditious and prudent manner possible."

1.0 INTRODUCTION

Although an introduction section was intended, no consensus was reached on the specific text for this section. Therefore, an introduction section is not provided.

2.0 TECHNICAL ALTERNATIVES

The following sections describe the short-term technical alternatives identified by the CLC Ad Hoc Committee on NXX Exhaust, additional assumptions concerning the alternatives and technical considerations that must be examined when implementing the alternative.

2.1 RATE CENTER CONSOLIDATION:

Description:

The Rate Center Consolidation (RCC) proposal suggests that the number of rate centers be reduced by combining or collapsing several existing rate centers into fewer consolidated rate centers. The Rate Center Consolidation proposal assumes that a CO/NXX code will not be used to identify more than one switch. Accordingly, carriers that have more than one switch in a (consolidated) rate center can still be assigned CO/NXX codes, based upon the demand for numbers in any given switch.

This proposal maintains both the current call-routing and call-rating methods; however, changes in the common rate center boundaries used by all Local Service Providers can only be implemented with regulatory consent. The specific time required for implementation will be dependent upon the complexity of the existing rate center structure and the extent of changes made to that structure and associated network elements to accommodate Rate Center Consolidation.

Additional Assumptions:

- In many cases, existing local calling plans are not rate center based. Just as CLECs request NXX codes to enable them to serve rate centers, they also request NXXs to allow them to match existing local calling plans which are not rate center based. Consequently, local calling plan consolidations may be required to permit rate center consolidation to have the desired effect.

- Service providers which have multiple switches serving a consolidated rate center will be permitted an NXX code per switch, i.e., a CO code will be assigned per rate center per switch.

- CMRS provider local calling areas differ significantly from wireline local calling areas. Nonetheless, CMRS providers are capable of utilizing NXX codes made available by Rate Center Consolidation.

- All local service providers within the area of consolidation will conform to the new rate center boundaries.

Technical Considerations:

1. Equal availability of numbers

   - Method provides equal availability of assignable NXXs to all industry segments.

2. Switch/OSS Development and Administration

   - Creation of new rate center areas requires new data entries in all industry and service provider databases/tables that use rate centers in their processes including switch translations.
   - Network changes may be required (e.g., trunking rearrangements including operator services trunks, local dialing plan, toll recording equipment).
   - Billing systems may require modifications, especially if hard-coding exists.
   - Modifications to customer contact operational support systems may be required.

3. Users/Services Impacts

   - Basic concept of local calling based upon a select set of NPA-NXXs is maintained; size of local area and/or toll boundaries may change.
   - Impact on any CPE that is rating-driven (e.g., automatic route selection, "smart" pay phones).
   - Rate center names and charges on customer bills may change.
   - Carrier specific calling plans may be impacted.
   - CPE changes may be required to accommodate dialing plan changes.
   - Customer education will be required.

4. Implementation Impacts (Out-of-area, by all, disproportionate)

Out-of-Area

- Other service providers may need to change billing system data to reflect new rate centers.
- Other service providers' individual toll rates between points may change.
- This alternative may precipitate CMRS network rearrangements outside the geographic area where the calling takes place in order to maintain calling areas for mobile-to-land calls.
- Customer education will be required.

Impact if Not Uniformly Implemented By All Service Providers

- An underlying premise of this alternative is that all carriers will conform to the new rate center boundaries.

Disproportionate

- The incumbent local exchange carrier (ILEC) industry segment believes the impact is high because of potential impact on revenue, costs of implementing the changes in embedded support systems and associated network rearrangements.

5. E911

The following concerns are rate center consolidation area-specific and may not be assumed to be universally applicable. Constructive interaction between serving carriers and Public Safety Answering Point (PSAP) operators must be undertaken in order to realize the maximum advantages of rate center consolidation. For example:

- Because PSAP regions fall within the jurisdiction of state/local regulatory authorities, the geographic based issues will vary.
- PSAP provider participation in rate center consolidation activities is voluntary; therefore, the level of PSAP provider cooperation may vary.
- Modifications for E911 default routing may be required.

- At the time of the initial rate center consolidation, PSAP-serving boundaries must be considered.

- Subsequent splitting of E911 tandem boundaries to provide capacity relief will be more complex.

- The benefits of RCC may be reduced if E911 routing service requirements continue to require an NXX per PSAP service area.

Other Considerations:

- RCC is the only method that assumes physical rate center boundaries will change. As a result, this method has unique technical and regulatory implications.

- Although RCC reduces future demand for NXXs, it does not supply any additional NXXs. It will allow for more efficient utilization of numbers from existing and future assigned NXXs.

  RCC can reduce code requirements now in areas where new entrants have NXX assignments but service has not yet been activated. Inactivated codes could be recovered for reassignment, but would require voluntary return of inactivated codes.

- RCC can be used both as a conservation measure to prevent future jeopardy situations and to alleviate some of the impacts of an existing jeopardy situation on certain carriers. However, where jeopardies currently exist, it is not likely that RCC will eliminate the immediate need for NPA relief.

- RCC, by expanding rate areas, makes NPA splits more complicated because of reduced flexibility in drawing NPA split boundaries.

- RCC does not require LRN to implement.

2.2 OVERLAY METHOD:

Description:

An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is provided by opening up a new NPA code within the same geographic area as the NPA(s) requiring relief. NXXs from this new NPA will be available for assignment equally to all carriers on a first come first served basis (per FCC 96-333, released August 8, 1996).

Overlays will eliminate existing jeopardy situations once they are implemented. In addition, implementation of an overlay well in advance of a projected NPA exhaust (i.e., early implementation) may prevent a jeopardy situation from occurring.

Additional Assumptions:

- Early implementation of overlays would allow service providers to voluntarily request NXXs from the "new" NPA, thereby reducing the demand for NXXs in the "old" NPA. Early diversion of demand for codes to the new NPA would depend on the extent to which carriers voluntarily request NXXs from the "new" NPA while codes still remain unassigned in the "old" NPA.

- The FCC has mandated 10-digit dialing for all local calls as one condition for an NPA overlay (FCC Docket No. 96-98).

- The overlay will not be implemented on a service-specific or technology-specific basis. Every telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in that NPA must have an NXX in the exhausting NPA (but not necessarily one NXX per rate center/local calling area) prior to implementing an overlay (FCC Docket No. 96-98).

Technical Considerations:

1. <u>Equal availability of numbers</u>

   - This method provides equal availability of unassigned NXXs in the new NPA to all industry segments.

   - Early implementation of overlays can make available unassigned NXXs in both old and new NPAs.

- Overlays are not implemented on an industry segmentation basis (i.e., the overlay is not restricted to wireline or wireless providers) which is consistent with FCC regulations.

2. Switch/OSS Development and Administration

- Overlays may require some companies to update switches to allow 10-digit dialing for local calls.
- Overlays may require changes to OSSs to support all customers' information on a 10-digit basis.

3. Users/Services Impacts

- This alternative requires customers to dial 10 digits for local calls, which will require significant customer education (e.g., would require new sensitivity to the area code). Customer education would become especially important if the permissive dialing period is shortened.
- CPE changes, including possible upgrade or replacement of some CPE, may be required to accommodate the 10-digit dialing requirement.
- Mandatory customer number changes within the affected overlay relief area are eliminated.
- Overlays do not require existing customers to change their telephone numbers.

4. Implementation Impacts (Out-of-area, by all, disproportionate)

Out of Area

- Dialing from outside of the area is not affected.

If Not Uniformly Implemented By All Service Providers

- It is assumed that this alternative would be uniformly implemented by all service providers.

Disproportionate

- An NPA overlay does not address the re-allocation of assigned NXXs in "old" NPAs. As a result, new entrants are likely to have access to fewer numbers in the old NPA than the incumbent LEC with which to compete for customers desiring numbers in the "old" NPA.

5. E911

- Some PSAP system upgrades may be required to display full 10-digit telephone numbers.

Other Considerations:

- Overlays have been implemented in some areas in the past, which may serve to model how it could be accomplished in the future and may minimize the time required to implement.
- The Overlay Method can be implemented in some areas now, but requires regulatory mandate and/or approval.
- This alternative does not conserve NXXs for wireline carriers. It is a measure to address an immediate problem while providing the industry the opportunity to address long-term solutions.
- Demand for NXX codes could be decreased and NXX utilization increased where CMRS providers elect to request codes from the overlay code instead of individual NXXs from each NPA.
- The early implementation of overlays can provide the industry, including new entrants, with the NXXs required to serve customers, while allowing time for the industry to formulate a national direction for number pooling.
- Implementation of the Overlay Method provides flexibility for determining the length of permissive dialing periods.
- The Overlay Method does not require LRN to implement.

2.3 EXPANDED NPA OVERLAY:

Description:

The Expanded NPA Overlay proposal implements an overlay covering regions defined by groups of Basic Trading Areas (BTAs) or a Metropolitan Trading Area (MTA). This proposal does not replace or change assignment boundaries for existing NPAs. This proposal permits the allocation of number resources over a potentially larger geographic region.

NXXs from this new NPA will be available for assignment equally to all carriers on a first come first served basis (per FCC 96-333, released August 8, 1996).

It also recognizes the geographic license territories for CMRS carriers adopted by the FCC from Rand-McNally demographic studies to follow the natural flow of commerce and public interest without division of municipal and county boundaries. The relief region of the new NPA boundary can be defined by any combination of BTAs or an MTA that accommodates the numbering requirements of a region.

This proposal does not require any change to existing rating mechanisms. Thus, from a technical feasibility standpoint, this alternative could be implemented by year end of 1997 for number availability relief in 1998.

Since the BTA and MTA boundaries do not coincide with the existing wire center or exchange boundaries, it may be possible for a NPA based on BTA/MTA boundaries to split one of these existing boundaries. Existing NPA, exchange and wire center boundaries do not recognize pre-existing county or municipal boundaries. When an NPA split is used to relieve the numbering congestion, wire center and exchange boundaries are used to determine where the new NPA boundaries will be placed, splitting counties or municipalities. Use of the Expanded Overlay would no longer cause a division across these governmental and economic communities of interest. Rather it would only require that an exchange or wire center accommodate the new NPA. When an expanded overlay boundary does not coincide with existing wire center boundaries, inclusion or exclusion of the serving switch in the use of this NPA would be at the discretion of the service providers and/or regulatory bodies. This is technically feasible today.

Since the Expanded Overlay can encompass multiple NPAs, LATAs and states, coordination between code administrators will be required. NXXs will still be assigned on a rate center basis, which will enable carriers to provide services based on their respective regulatory obligations and business practices.

Additional Assumptions:

- Early implementation of expanded NPA overlays would allow service providers to voluntarily request NXXs from the "new" NPA, thereby reducing the demand for NXXs in the "old" NPA. Early diversion of demand for codes to the new NPA would depend on the extent to which carriers voluntarily request NXXs from the "new" NPA while codes still remain unassigned in the "old" NPA.

- The FCC has mandated 10-digit dialing for all local calls as one condition for an NPA overlay (FCC Docket No. 96-98).

- The FCC will utilize their authority to implement multi-state NPA codes.

- The expanded NPA overlay will not be implemented on a service-specific or technology-specific basis. Every telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in that NPA must have an NXX in the exhausting NPA (but not necessarily one NXX per rate center/local calling area) prior to implementing an overlay (FCC Docket No. 96-98).

Technical Considerations:

1. Equal Availability

   - This method provides equal availability of unassigned NXXs in the new NPA to all industry segments.

   - Early implementation can make available unassigned NXXs in both old and new NPAs.

   - Overlays are not implemented on an industry segmentation basis (i.e. the overlay is not restricted to wireline or wireless providers) which is consistent with FCC regulations.

2. Switch/OSS Development and Administration

   - Expanded overlays may require some companies to update switches to allow 10-digit dialing for local calls.

   - Expanded overlays may require changes to OSSs to support all customers' information on a 10-digit basis.

- Expanded overlays may require OSS administration for geographic regions larger than the existing NPA boundary.

3. User/Services Impacts

- This alternative requires customers to dial 10 digits for local calls, which will require significant customer education (e.g., would require new sensitivity to the area code). Customer education would become especially important if the permissive dialing period is shortened. Since the industry is currently only required to provide this education to customers in the affected area, some additional effort may be required for notification outside the area.

- CPE changes, including possible upgrade or replacement of some CPE, may be required to accommodate the 10-digit dialing requirement.

- Mandatory customer number changes within the affected overlay relief area are eliminated.

- Expanded NPA overlays do not require existing customers to change their telephone numbers.

4. Implementation Impacts (Out-of-area, by all, disproportionate)

Out of Area

- Dialing from outside of the area is not affected.

- Carrier restrictions on completing calls to an NXX within the NPA that lies outside the selected carrier's regulated service area may require CPE and local routing table updates to look at six versus three digits.

If Not Uniformly Implemented By All Service Providers

- It is assumed that this alternative would be uniformly implemented by all service providers in a jeopardy situation. In a non-jeopardy situation where existing NXXs are available, use of the expanded NPA overlay NXXs would be voluntary.

Disproportionate

- An expanded NPA overlay does not address the re-allocation of assigned NXXs in "old" NPAs. As a result, new entrants are likely to have access to fewer numbers in the old NPA than the incumbent LEC with which to

compete for customers desiring numbers in the "old" NPA. However, new entrants will have access to NXXs in the new NPA, which they might not otherwise have had under jeopardy situations where numbers are only available on a lottery basis.

- If expanded regions are interstate, coordination between regional CO code administrators are required. This may be less of an issue in the future when CO code administration is consolidated under the new NANPA.

5. E911

- Some PSAP system upgrades may be required to display full 10-digit telephone numbers.

Other Considerations:

- This alternative recognizes the community of interest of BTA/MTA based local serving areas designated by the FCC.
- It does not cut municipal or county political boundaries.
- Demand for NXX codes could be decreased and NXX utilization increased where CMRS providers elect to request codes from the overlay code instead of individual NXXs from each NPA.
- The early implementation of expanded NPA overlays can provide the industry, including new entrants, with the NXXs required to serve customers, while allowing time for the industry to formulate a national direction for number pooling.
- This alternative does not conserve NXXs for wireline carriers. It is a measure to address an immediate problem while providing the industry the opportunity to address long-term solutions.
- Implementation of the expanded NPA overlay method provides flexibility for determining the length of permissive dialing periods.
- The expanded NPA overlay method does not require LRN to implement.
- This alternative can provide relief to more than one existing NPA.

2.4 EXTENDED LOCAL CALLING AREA (ELCA) APPROACH

Description:

ELCAs, also known as "reverse toll," "LATA-wide calling plans," or the "land-to-mobile option" have been offered to CMRS providers by most Local Exchange Carriers (LECs) in numerous jurisdictions since the late 1980s on a voluntary, bilateral basis. ELCAs permit wireline callers from a pre-determined, fixed, geographic area, typically a LATA, to call wireless end-users anywhere in the corresponding wireless local calling area without a toll charge. Existing wireline dialing conventions remain intact. The CMRS carrier pays the wireline carrier a negotiated per minute rate for this service. LECs record this usage at the calling parties' end-offices. At the end of the billing period, usage for all end offices within the ELCA is aggregated and a simple bill is rendered to the CMRS provider.

Interconnection between the CMRS provider and the serving LEC is generally at the tandem. CMRS carriers who elect to utilize ELCAs as their sole interconnection rrangement require only as many NXX codes as necessary on a LATA-wide basis to serve the CMRS customers. (Use of individual NXX codes per rate center would be at the discretion of the CMRS provider.)

Additional Assumptions:

- Tariff or contracts must be developed by the LEC to offer ELCAs. Regulatory approval is generally required.
- ELCAs will not be the sole form of interconnection available to CMRS providers in a given geographic area.
- LNP and/or Number Pooling implementation will necessitate modifications to the ELCA architecture.

Technical Considerations:

1. Equal Availability of Numbers

   - This proposal does not increase the supply of NXXs; it also does not reduce wireline requirements for NXX codes. However, to the extent that this proposal allows wireless carriers to use fewer NXXs, wireline providers could benefit through the increased availability of NXXs.

2. Switch/OSS Development and Administration

- During the time frame under consideration by this workshop, no switch or OSS development is required in areas where NXX-based services are already deployed. As noted above, ELCAs have been provided since the late 1980's in multiple areas, each with its own diverse technical characteristics. It will be necessary for both the serving LEC and the CMRS customer to add capabilities to preserve ELCAs in a post-wireless LNP environment. These capabilities are believed to be compatible with the LRN LNP architecture.

3. Users/Services Impacts

- If a wireline customer ports from a LEC that offers ELCAs to one that does not, confusion could be caused because call charge treatment to the wireline caller would change. (Currently, many CMRS providers will not offer the service unless all LECs in the area offer ELCAs)

Implementation Impacts (Out-of-area, by all, disproportionate)

Out of Area

- None identified

If Not Uniformly Implemented By All Service Providers

- The levels of customer confusion and complaints is higher in areas where LEC ELCA availability is not ubiquitous because wireline callers believe all calls to ELCA numbers should be free, regardless of their wireline dial tone provider. The service is most effective if all LECs within and ELCA area provide the capability.

Disproportionate

- Provision of ELCAs requires regulatory approval. Should non-CMRS entities obtain such approval, there is no technical reason why these entities could not utilize ELCAs. But, it is important to note that both the prevailing jurisdiction and cost recovery considerations are much different for CMRS than they are for wireline operators.

- ELCAs could have a disproportionate impact on intra-LATA toll providers because ELCAs can reduce the volume of intra-LATA toll services.

Other Considerations:

- The FCC, not state regulatory agencies, determines CMRS "calling areas."
- This alternative does not require LRN to implement.
- ELCAs can be deployed in concert with other NXX conservation techniques.

2.5 NXX-X LOCATION ROUTING NUMBER (LRN):

Description:

The NXX-X LRN proposal would allow NXX(s) within a given NPA to be shared among entities which offer service to subscribers within a specified geographic area (e.g., a rate area). Specifically, the proposal allows the assignment of numbers to service providers on a 1000s block or NXX-X level, thereby allowing entities to assign numbers from within their allocated 1000s blocks to their subscribers who reside in the geographic (currently rate center) area to which the NPA-NXX is assigned.

Implementation of NXX-X LRN would be confined only to offices equipped with LNP.

The LRN architecture will permit call routing without the need to perform switched-based, seven-digit (NPA-NXX-X) analysis and translations. Call rating processes are not impacted as the identification of calling and called party locations and the associated call rating information can continue to be based upon current methodology -- that is, six digit analysis. Moreover, because the proposal shares NXXs within a given area (rate center), the geographic information embedded within the telephone number is unchanged and should allow implementation without customer confusion.

The proposal is that only those numbers actually assigned to subscribers should be entered into the LNP SMS. This arrangement lessens demand on SMS/SCP capacity, but adds steps to the provisioning process as it requires each assigned number to be entered into the SMS before calls can be completed.

In summary, this proposal reduces the number of NXXs needed in a given area (currently rate center) in that it precludes the need to obtain an entire NXX by an entity to serve its customers within that rate area.

Additional Assumptions:

- It is not the intention of this proposal to accelerate the schedule set forth by the FCC in Order 96-115 for the deployment of LNP.
- This proposal assumes that LNP will not be advanced in any switch, including CMRS provider switches, in order to implement NXX-X LRN proposal. Further, in a LNP-capable switch, an NXX will not be made portable merely to accommodate NXX-X LRN.
- The NXX-X LRN option should be limited to only those switches that have deployed LNP.
- LRN number portability and its supporting processes are in place.
- Sharing of NXX 1000s blocks will be within a single rate center.
- No determination has been made with respect to the administration of the 1000s blocks.
- This proposal states that only numbers assigned to subscribers will be placed in the LNP SMSs. Thus, the LERG assignee would be responsible for vacant number determination as well as default query responsibilities.
- To the extent possible, the LERG NXX assignee responsibility should be distributed across all entities to balance the impact of the NXX LERG assignee being responsible for default routing and vacant number treatment.
- The NXX-X LRN proposal is not intended to influence permanent numbering pooling implemented by the industry.
- NXX-X LRN proposal is applicable to new central office codes. NXX-X LRN is also applicable to allocate 1000s blocks within a central office code already assigned to an entity in which there are no subscribers. Consideration may also be given to including assigned central office codes with 1000s blocks which have a minimal number of subscribers.

Technical Considerations:

1. Equal availability of numbers

   - Because this solution requires LNP, it is not currently technically feasible for all segments of the industry:

     ⇒ It may be neither possible nor appropriate for CMRS providers to utilize numbers made available in 1000s blocks. Nonetheless, CMRS providers are capable of utilizing entire NXX codes that could be made available by the NXX-X LRN proposal.

     ⇒ It may not be possible or practical for non-LRN capable wireline entities to utilize numbers made available via porting of NXX-X LRN. Nonetheless, those entities are capable of utilizing entire NXX codes that could be made available by utilizing this proposal.

2. Switch/OSS Development and Administration

   - The NXX-X LRN proposal will impact number assignment processes, necessitating the need for modifications in Operations Support Systems (OSSs), including billing systems and customer contact systems, changes in the Central Office Code Assignment Guidelines and possible expansion of the responsibilities of the Central Office Code Administrator.

   - For some entities, modifications to the LERG are necessary to implement the NXX-X LRN proposal in order to support internal operational support systems as well as 1000s block administration.

   - Other entities suggest that modifications to the LERG are not necessarily required and that a single entity can be identified with the NPA-NXX as the LERG designated carrier.

3. Users/Services Impacts

   - None identified

4. Implementation Impacts (out-of-area, by all, disproportionate)

   Out-of-Area:

   - None identified

If Not Uniformly Implemented By All Service Providers:

- An underlying premise of this alternative is that all LNP-capable switches participating in LNP in a specified area will be required to utilize this method.

Disproportionate:

- This method may competitively disadvantage one service provider over another because of LNP technology. If one service provider using LNP is able to acquire numbering resources and can provide services to customers in an area where another service provider cannot provide services to customers due to a lack of numbering resources (due to no LNP technology), then a competitive advantage has been provided to the service provider who obtained the numbering resource.

- It is recognized that CMRS providers will not be LNP capable before June 30, 1999, and could therefore be negatively impacted if obligated to participate in NXX-X LRN prior to that time. Specifically, their participation in NXX-X LRN could create additional burdens with call completion and cause errors in the existing systems used to support registration and roaming. Accordingly, it is suggested that wireless carriers could be considered exempt from participation in NXX-X LRN until they deploy their LNP capability. CMRS providers still need equal and non-discriminatory access to numbers. As such, the implementation of NXX-X LRN alone may not be sufficient to relieve a jeopardy NPA situation.

- The entity responsible for a 1000 block administration will have additional workload in order to administer the NXX in a neutral manner.

Other Considerations:

- This proposal has many elements which have never been implemented, which may result in additional delays and may increase the time required to implement.

- The recovery of additional administrative costs associated with 1000s block administration will need to be addressed.

- In some instances, a non-LNP carrier will have an increase in the number of ported calls that they will have to terminate through an LNP-capable carrier which may increase the compensation they owe the carrier that provided the LNP functionality.

- Number assignment will be impacted by the manner in which the LNP SMS is utilized. An alternative to the assumption that places only numbers assigned to subscribers in LNP SMS would be to place all numbers within the 1000s blocks in the LNP SMS. Although this arrangement adds capacity requirements to the NPAC/SMS and associated service provider network SCPs. it should simplify and shorten the provisioning process and place responsibility for vacant number treatment on the entity allocated the 1000s block which contains the vacant number. Regardless of how the data is loaded, further investigation is needed into the NPAC/SMS costs and LNP NPAC functional impacts.

- Further investigation is needed if the NXX-X LRN method is used to allocate 1000s blocks in which numbers are currently working for customers of another service provider.

2.6 UNASSIGNED NUMBER PORTING PROPOSAL:

Description:

This proposal involves making available unassigned numbers in one provider's network to other providers for assignment to their customers by porting of these unassigned numbers. For the purpose of this proposal, an available unassigned number is one that would be available for assignment to a customer in the donor network. This requires that both the switch donating the unassigned numbers and the switch of the new provider receiving the unassigned numbers be equipped for LNP. (LNP refers to service provider portability using LRN architecture.) LRN requires that carriers have at least one NPA NXX assigned per switch per LATA for the purposes of assigning a local routing number.

Implementation of unassigned number porting would be confined only to offices equipped with LNP.

The use of unassigned number porting would be confined to situations where the receiving network either has no NXX assigned to the rate area for which the unassigned numbers are requested, or has exhausted its number resource in that rate area. (In cases where ILEC calling plans are not rate area based, the lack of NXX assignment refers to an NXX corresponding to the ILEC calling plan, not just to a rate area.) Unassigned number porting for a particular rate area (or calling plan) would be discontinued once an NXX became available for assignment to the recipient provider for the rate area (or calling plan) in question. Available unassigned numbers would not be assigned outside of their existing rate centers or calling plan areas.

Additional Assumptions:

- This proposal assumes that LNP will not be advanced in any switch, including CMRS provider switches, in order to implement unassigned number porting. Further, in a LNP-capable switch, an NXX will not be made portable merely to accommodate unassigned number porting.
- In general, the prevailing service provider portability LNP procedures would apply to customers served by this alternative. Existing service provider procedures to port a number will need to be modified.
- Unassigned numbers can only be requested for bona fide customers (i.e., not for use for reserving for anticipated customers).
- The company that has NXXs with available numbers will be responsible for administration of the individual line numbers available for porting. This proposal does not include establishing a neutral, third-party administrator for unassigned individual line number distribution.
- Administrative guidelines would be required.
- All sharing of telephone numbers will be within the rate center.
- All numbers ported to another carrier will be placed in the LNP SMSs (even if temporarily unassigned, disconnected, or vacant, etc.).
- It is not assumed that the form of pooling associated with porting of unassigned numbers will be the permanent form of pooling implemented by the industry.
- It may be neither possible nor appropriate for CMRS providers to utilize numbers made available via porting of unassigned numbers. Nonetheless, CMRS providers are capable of utilizing entire NXX codes that could be made available by the porting of vacant numbers proposal.
- Vacant number treatment would be generic.
- Carriers not assigned numbers via this method should have means of obtaining numbers via other methods.

Technical Considerations:

1. Equal availability of numbers

   - Because this solution requires LNP, it is not currently technically feasible for all segments of the industry:

     ⇒ It is not technically feasible for CMRS providers to utilize numbers made available via the porting of unassigned numbers. Nonetheless, CMRS providers are capable of utilizing entire NXX codes that could be made available by utilizing this proposal.

     ⇒ It may not be possible or practical for non-LRN capable wireline entities to utilize numbers made available via porting of unassigned numbers. Nonetheless, those entities are capable of utilizing entire NXX codes that could be made available by utilizing this proposal.

2. Switch/OSS Development and Administration

   - The entity with available numbers is responsible for administration of which numbers are available for porting and must process requests from all entities requesting numbers to be ported.

   - Query/switch loads/responsibilities may differ when porting unassigned numbers.

   - OSS development/administration is dependent on completion of related processes and guidelines, which may be more complex than NXX-X proposal.

   - Some providers may require Customer Contact system modifications to assure assignment of vacant numbers are not duplicated for multiple customers.

3. Users/Services Impacts

   - None identified

Implementation Impacts (By all, out-of-area, disproportionate)

Out-of-Area

   - None identified

If Not Uniformly Implemented By All Service Providers

- An underlying premise of this alternative is that all carriers participating in LNP will be required to utilize this method. If this is performed on a voluntary basis only, there should be no negative impacts, but the potential advantages will not be realized.

Disproportionate

- This method may competitively disadvantage one service provider over another because of LNP technology. If one service provider using LNP is able to acquire numbering resources and can provide services to customers in an area where another service provider cannot provide services to customers due to a lack of numbering resources (due to no LNP technology), then a competitive advantage has been provided to the service provider who obtained the numbering resource.

- Entities with unassigned numbers will bear the burden of additional workload in order to administer these numbers in a neutral manner.

- It is recognized that CMRS providers will not be LNP capable before June 30, 1999 and could therefore be negatively impacted if obligated to participate in unassigned number porting prior to that time. Specifically, their participation in unassigned number porting could create additional burdens with call completion and cause errors in the existing systems used to support registration and roaming. Accordingly, it is suggested that wireless carriers could be considered exempt from participation in unassigned number porting until they deploy their LNP capability. CMRS providers still need equal and non-discriminatory access to numbers. As such, the implementation of unassigned number porting alone may not be sufficient to relieve a jeopardy NPA situation.

5. E911

- None identified

Other Considerations

- This proposal has never been implemented, which may result in additional delays and may increase the time required to implement.

MATRIX

Although a matrix was developed, no consensus was reached on the specific text to be included in the matrix. Therefore, a matrix is not provided.

EXHIBIT B

MEETING MINUTES OF THE
NEW HAMPSHIRE 603 NPA RELIEF PLANNING
INDUSTRY MEETING
Thursday January 7, 1999 – Manchester, New Hampshire

WELCOME AND INTRODUCTIONS

Pamela Kenworthy, Lockheed Martin NPA Relief Planner, welcomed participants to the meeting and asked the attendees to introduce themselves and identify the companies they represented. See Attachment # 1 for the names of those who were invited to the meeting and 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 TRANSITION – NANPA's ROLE AND RESPONSIBILITIES

Pamela explained that the NANPA transition that began last February will conclude in March and she also explained the difference between new relief activities and any relief activities that began prior to February. In addition, Pamela advised participants that the CO Code Administration Transition for Bell Atlantic North and South were completed and that all CO Code Requests should be directed to NANPA CO Administration in Concord California. Pamela provided the dates for the remaining CO Code Administration Transition meeting dates.

Pamela emphasized NANPA's primary role to serve as NANP Administrator. This entails all aspects of the administration functions that were performed by Bellcore, centralization of the functions associated with CO Code Administration and to assume NPA relief coordinator functions.

OVERVIEW and SUMMARY OF "What to Expect"

Pamela gave an overview of the components of the NPA Relief Meeting and provided an explanation of the relationship of the Industry Guidelines to NPA Relief Planning. Pamela discussed the merits of face to face meetings and that the objective was to reach consensus on a single relief alternative.

CONSENSUS PROCESS

Pamela reviewed the ATIS Consensus process as defined by the industry and explained the minutes will only contain consensus items and statements for the record would be allowed. The service providers that were represented at the meeting were displayed on the easel and it was determined that there were 17 possible voices for consensus items representing various segments of the industry.

REVIEW of NOVEMBER 19, 1998 MEETING MINUTES

A review of the meeting minutes took place. The only alteration was a typo.

REVIEW OF INDUSTRY GUIDELINES

Pamela stated that the purpose of the meeting was to come to consensus on a single NPA relief plan to submit to the Commission for consideration. She reviewed the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016) which participants were requested to bring with them. This document can be obtained from the internet; the website address is www.*atis.org/atis/clc/inc/incdocs.htm*.

U. S. CENSUS BUREAU DATA

U.S. Census Bureau data for the state of New Hampshire was reviewed including population statistics for the top counties in New Hampshire.

INITIAL PLANNING DOCUMENT

Each section of the Initial Planning Document (IPD) that was prepared and distributed prior to the meeting was reviewed. See attachment # 3. Pamela pointed out that grandfathering, Type IIA Lives in the IPD, was analyzed and included in the initial planning document because this has been ordered in other states. Pamela reviewed the maps for each relief alternative and described the location of the boundary lines as being near County lines for each split alternative. For alternative #2, it was noted Portsmouth is in Area A vs. Area B.

ADDITIONAL ALTERNATIVES PROPOSED

Union Telephone indicated that it could be beneficial to alter one of the original split plans, but instead of formally submitting an additional alternative provided the following Statement for the Record.

Statement for the Record from Union Telephone Company

If a geographic split alternative is ultimately decided as the method of introducing a new area code, Union Telephone Company, 13 Central Street, Farmington, New Hampshire, would like the opportunity to reconsider the boundary line proposed by Lockheed Martin to avoid splitting communities of interest, such as school districts, municipal offices, etc.

Next, a discussion of the various attributes of a split vs. overlay ensued for a short time at the request of one of the participants.

ELIMINATION OF ALTERNATIVES

Alternative # 4 was eliminated by consensus because of jurisdictional issues (e.g. multi-state involvement), short life and it does not specifically address relief in New Hampshire.

Consensus was also achieved to eliminate the split options and recommend alternative #1, an all services overlay to the New Hampshire Public Utilities Commission.

Statement for the Record from MediaOne, MCI WorldCom and AT&T

It is the position of MediaOne, MCI WorldCom and AT&T that a geographic split is the area code relief alternative that would best serve New Hampshire and foster competition. A geographic split would preserve the 603 area code within a designated portion of the state, and would permit the retention of seven-digit dialing. A geographic split fosters competition, in that a CLEC can enter New Hampshire and provide customers with codes in the existing NPA. Thus a split enables CLECS to provide service on more equal footing with incumbent providers. Measures to mitigate the anti-competitive impacts of an overlay relief method are not currently sufficient to address out concerns. It is our opinion that the implementation of an overlay will impede the timely entry of effective competition in the New Hampshire market.

CONSENSUS ON DIALING PLAN

Consensus was reached for 10-digit dialing in agreement with the FCC order. The provisions of the dialing plan include 10-digit dialing within each NPA and between the new and old NPA with permissive 1+10 digit dialing.

CONSENSUS ON IMPLEMENTATION INTERVALS

A recommendation not to consider implementation intervals during the meeting was made because an Order has not been issued and it was thought that setting dates now may get publicized with the media and customers would be confused. This could be discussed at the implementation meeting following a commission decision. Consensus was achieved on this recommendation. The participants at the January 7, 1999 meeting reached unanimous consensus on the following Statement for the Record and requested that the same statement be included in the cover letter accompanying the industry report, to be filed by Lockheed Martin to the New Hampshire Public Utilities Commission on behalf of the industry.

Statement for the Record from Industry Participants

In light of the anticipated fourth quarter 2000 exhaust of the 603 NPA, the data on NXX usage in the 603 NPA, and the one to one and one half year estimated time period for implementing area code relief, the industry respectfully requests that the New Hampshire Public Utilities Commission issue a decision providing for area code relief by June 1, 1999.

CONSENSUS ON COMMITMENT FOR TEST NUMBER

Bell Atlantic volunteered to provide the test code with the assignment of a code in the overlay NPA.

CONSENSUS TO FILE WITH THE COMMISSION

The industry participants reached consensus to have NANPA file the industry efforts regarding the relief method selected by the industry with the New Hampshire Public Utilities Commission. The participants also reached consensus that NANPA would distribute the Final Jeopardy procedures to the Industry and provide a courtesy copy to the Commission. This will all be accomplished by February 18, 1999.

CONFERNECE CALL TO APPROVE THE MEETING MINUTES

A conference call to approve the DRAFT meeting minutes was scheduled for January 26, 1999 at 1:00 Eastern. A copy of the DRAFT meeting minutes will be distributed by 1/21/99.

Dial information: 651-291-5198 (9346*)
Duration: 90 minutes
40 Ports
Host: Jim Deak

Init	Last Name	First Name	Company	Phone	Fax
	Adair	Bill	Southwestern Bell	913-676-1539	913-676-110
	Addicks	Stephen	MCI Metro	703-394-7202	703-918-661
	Alberico	David	All Florida Paging	800-815-0216	407-260-582
	Alexander	Donna	Omnipoint	401-888-5704	401-574-437
	Allen	Gordon	GTE Communications Corp.	972-714-0244	800-483-555
	Anderson	Joel	NH House of Rep.	603-271-3600	603-271-668
	Andreasi	Steven	TCG - Milwaukee		
	Atkins	Jim	Vitts Corporation	603-656-8001	603-656-810
X	Bailey	Kate	N.H. Public Utilities Commission	603-271-6024	603-271-387
	Bates	Wayne	Public Service Commission of KY	502-564-3940	502-564-158
	Beary	James	Porta-Phone Paging	850-841-7100	850-561-899
	Benfield	Gail	MCI WorldCom	214-561-3667	214-749-450
	Bennett	Mary	Radiofone, Inc.	504-837-8330	504-831-785
	Blackburn	Karen A.	PrimeCo Personal Communications L.P	904-348-3623	904-348-361
	Borislow	Daniel	Tel-Save, Inc.	215-862-1500	215-862-108
	Bradely	Job		603-569-2295	603-878-100
	Brooks	Suzanne	MCI World Com	972-656-1430	972-656-149
	Bumgarner	Jack	Central Wireless Partnership	209-440-0164	209-440-029
	Castle	Gregory	Pacific Bell	415-542-7083	415-543-293
	Clifford	Joan	Bell Atlantic	508-624-2476	508-624-485
	Cocotta	Sue	Frontier Local Services	716-777-1692	716-325-638
C	Coolbroth	Frederick		603-695-8571	603-695-861
	Cort	Alan	Bell Atlantic	603-645-3693	603-641-167
	Craig	Ellen	USN Comm. Long Distance Co.	312-906-3802	312-559-838
X	Daniels	Robert	Union	603-859-3700	603-859-985
	Davis	Dean	Vista United Telecommunications	407-827-2115	407-827-212
	Day	Steven	Metrocall	703-660-6677	703-765-438
	Del Vecchio	Victor	Bell Atlantic	617-743-2323	617-737-064
	DeSisto	Thomas	Bell Atlantic	617-743-5785	617-743-483
	Dewees	Robert	Peabody & Brown	617-345-1316	617-345-130
	Dingwall	Craig D.	Sprint Communications	202-828-7447	202-828-740
X	Doughty	Karon	Union Telephone	603-859-3700	603-859-998
	Downey	Jennifer	RCC/ Atlantic	802-654-5112	802-655-361
X	Downs	Jena	Bell Atlantic	410-736-6711	410-736-606
	Duane	Jennifer	Sprint Comm. Company L.P.	202-828-7422	202-828-740
	Duckett-Borw	Christine	First World Comm.	925*473-1157	928-473-181
	Eaton	Stephaine	NH House of Rep.	603-271-3600	603-271-668
	Edelman	Joanne	Lockheed Martin - NANPA	925-363-8710	925-363-871
	Edelman	Joanne	Lockheed Martin-NANPA	925-363-8710	925-363-872
	Emmert	Mark	N.H. Public Utilities Commssion	603-271-6321	603-271-387
X	Fagundus	David	AT&T	617-574-3215	617-574-327
X	Faul	Kelly	MCI WorldCom	703-918-0457	703-394-736
	Fuglie	Paul	GTE Communications Corporation	972-717-8371	972-717-846
	Gallagher	Josephine	Bell Atlantic	703-974-8160	703-974-061
	Gallagher	Bernard	Century Communications	203-972-2003	203-972-201
	Goodearl	Donald	Digital Signal Communications, Inc.		
	Hal	Lynde	NH House	603-635-7215	
	Handley	Cathy	PCIA	703-739-0300	703-836-160
	Hart	Mary	N. H. Public Utilities Commission	603-271-6016	603-271-387
	Hayes	Sheila	Sprint	913-534-2623	913-534-536
	Healy-Wurm	Jill	Bell Atlantic	603-645-2606	603-641-167
	Hiltz	Cara	Hyperion Telecommunications	412-220-5083	412-220-516
	Hoffstead	Renee	Network Plus, Inc.	212-894-2422	212-432-711
	Hogue	John	Sprint	913-624-6016	913-624-550
X	Holmes	Michael	Office of Consumer Advocate		
X	Homeyer	William	N.H. Office of Consumer Advocate	603-271-1175	603-271-117
X	Hubert	Nancy	Bretton Woodstel	603-278-9911	603-278-991

Init	Last Name	First Name	Company	Phone	Fax
	Ileri	Levent	Florida Public Service Commission	850-413-6562	850-413-656
	Imbag	Jennifer	TSR Paging	818-346-0611	818-346-054
	Jackson	Barclay	N.H. Public Utilities Commission	603-271-2431	603-271-387
	James	Michelle	MCI World Com	616-224-4603	616-224-510
	Johnson	Mary	AT & T	816-995-3440	816-995-248
	Jordan	Paula	AirTouch Corp.	925-279-6033	925-279-662
	Kay	Karen	Level 3 Communications	303-926-3256	303-926-345
	Keithley	Jay C.	Sprint Communications		
	Keller	Paul	N.H. Public Utilities Commision	603-271-6326	603-271-387
	Kelly	Lonnie	Foothills Rural Telephone Corp.Inc.	606-297-3501	606-297-200
X	Kenworthy	Pamela	Lockheed Martin-NANPA	973-267-7812	973-267-792
	Kestenbaum	Leon	Sprint Communications		
X	Kimberlin	Tony	Bell Atlantic	410-736-7823	410-736-606
	Kittrick	Kathleen	Vanguard Cellular Systems, Inc.	717-319-4446	717-579-406
	Kizzee	Cheryl	MCI WorldCom	972-561-5094	214-749-450
	Koester	Jeff	Lightship Telecom	508-481-0291	508-481-049
	Kokinos	Marie	Cox Communications	619-226-5466	619-266-535
	Krueger	Robert	ComSouth Telecom, Inc.	912-783-4001	912-892-900
	Krug	John F.	Teleport Comm.	718-355-2762	718-355-480
	Kuhnow	Carol	LCI International	703-848-4466	703-848-440
	Kwon	Rhea	Allegiance Telecom	708-836-5242	708-836-534
	LaQuiere	Jerry	LEC-LINK		
X	Livingston	Forest	N.H. Public Utilities Commission	603-271-6326	603-271-387
	London	Gary	AT&T Wireless	805-389-3834	805-389-385
	Louie	Cecilia	Lockheed Martin	925-363-8708	925-363-871
	Lukowski	Raymond	Winstar Telecommunications, Inc.	703-645-5463	703-645-570
X	Lutz	Mary Anne	N. H. Public Utilities Commission	603-271-2433	603-271-387
	Lyle	Tom	N.H. Public Utilities Commission	603-271-6038	603-271-387
X	MacGillivray	Jeffrey	NH State Rep.	603-878-4251	603-878-100
	Mann	Mike	TSR Wireless	781-229-2200	781-272-830
	Marotta	Julie	Telecom Consulting	617-696-6841	617-696-647
X	Martin	Doug	Wilton/Holl's	603-654-9911	603-654-990
	McCarthy	Angela	MapMobile Communications	757-424-1191	757-578-496
	McClean	Garry	West KY Rural Telephone Co.	502-674-1000	502-856-365
	McClenan	Ron	Excel Comm., Inc.	214-863-8304	214-863-830
	McGee	Thomas	AT&T	770-785-5872	770-929-434
	McNaught	Ted	Northeast Paging	207-856-0078	207-854-088
	Meins	Charlene	AT&T Wireless	425-803-1232	425-828-860
	Meldazis	Daniel	Focal Communications Corp.	312-895-8272	312-895-840
X	Milby	Wayne	Lockheed Martin-NANPA	804-795-5919	804-795-551
	Mocas	Robert	Easton Telecom Services	330-659-6700	330-659-937
	Monahan	James	The Dupont Group	603-228-3322	603-228-071
	Mondon	Jeffrey	Pacific Bell-Code Administration	925-824-8845	925-355-926
X	Montgomery	Peter	Dumbarton Telephone	603-774-9911	603-774-400
X	Mosca	Paul	Cellular One of Boston	617-462-7048	617-462-597
	Munnelly	Robert	New England Cable TV Association	781-843-3418	781-849-626
X	Nelson	Stephen	Dunbarton Telephone Co.	603-774-9911	603-774-400
X	Nestor	Shawn	Bell Atlantic	617-743-8880	617-743-483
	Nestor	John	Bell Atlantic	617-743-8880	617-743-483
	Newman Hirs	Claudia	Quintelco, Inc.	914-620-1212	914-620-171
	Noonan	Amanda	N.H. Public Utilities Commission	6033-271-243	603-271-387
	Noppenberge	Derek	Bell Atlantic	410-736-6729	410-736-606
X	Osler	Beth	MCT Telecom	603-746-9258	603-746-356
X	Parker	Stacey	MediaOne	978-683-5500	978-683-705
	Paswaters	Shirley	Level 3 Communications	303-926-3071	303-926-345
X	Patch	Douglas	N.H. Public Utilities Commission	603-271-2442	603-271-387
	Patrick	Blaine	New England Voice Data	603-472-5220	401-854-235

Init	Last Name	First Name	Company	Phone	Fax
	Pendelton	Charles	CAP Management	606-432-0720	606-433-050
	Perry	David	Bell Atlantic Mobile	781-932-1535	781-932-906
X	Phillips	Bubba	AT&T Long Distance	770-785-5773	770-929-434
X	Pierpont	Laura	Bell Atlantic	410-736-6547	410-736-606
	Plott	David	CONXUS Network, Inc.	864-239-5311	864-241-819
	Rand	Chris	Granite State Telelphone	603-529-9911	603-529-102
	Rappaport	Bruce	Bell Atlantic Mobile	908-306-7862	908-306-724
	Reid	Sean	Metrocall	706-321-0817	706-321-972
	Renna	Diane	AT&T Local	908-234-7347	908-719-724
	Rogers	Ken	Alltel Communications	773-399-5381	773-399-253
	Rooney, Jr.	William	Global NAPS	617-350-0100	617-426-525
X	Rothfelder	Martin	Rothfelder Law Office	908-301-1211	908-301-121
	Rowland	Tom	North Central Tel. Coop.	615-666-2151	615-666-677
	Rush	Eileen	Bell Atlantic	617-743-3296	617-743-483
	Rutledge	Tene	Teligent Inc.	703-762-5532	703-288-564
	Sanders	John	Preferred Networks, Inc.	770-582-3723	770-734-093
	Schiltz	Jeanne	TPS Telecom	608-664-4236	608-664-422
X	Schmidt	Ellen	MediaOne	978-683-5500	978-683-705
X	Sirignano	Tony	Bell Atlantic Mobile	781-932-1209	781-932-906
	Smith	Janet	Bell Atlantic	508-624-2058	508-624-485
	Sousa	Barbara An	Bell Atlantic	617-743-7331	617-737-064
	Souza	Robert. J.	Saco River Telegraph & Tele. Co.	207-929-9941	207-929-626
X	Stafford	Bill		603-529-6221	603-529-102
	Stallworth	Sharon	KMC	908-719-2200	908-719-221
	Szilagyi	Rick	Freedom Ring dba Bay Ring Communica		
	Telecom	Manager	Network Plus		
	Telecom	Manager	Third Rail Wireless Services, Inc.		
	Telecom	Manager	US West Interprise of America, Inc.		
	Telecom	Manager	Winstar Gateway Network Inc.		
	Telecom	Manager	Bretton Woods Telephone Co.	603-278-9911	603-278-991
	Telecom	Manager	Contoocook Valley Telephone Co.	603-464-9911	603-746-356
	Telecom	Manager	NE Voice & Data		
	Telecom	Manager	Hollis Telephone Co.	603-465-9911	603-654-990
	Telecom	Manager	Metracom		
	Telecom	Manager	Wilton Telephone Company	603-654-9911	603-654-990
	Telecom	Manager	Dixville Telephone Co.	603-255-3400	603-255-467
	Telecom	Manager	Comm South Companies Inc.		
	Telecom	Manager	MFS Intelenet Inc.		
	Telecom	Manager	Massachusetts Wholesale Telephone		
	Telecom	Manager	LDM Systems Inc.		
	Telecom	Manager	ICG Telecom Group		
	Telecom	Manager	Group Long Distance Inc.		
	Telecom	Manager	Frontier Communications of the West		
	Telecom	Manager	Dial & Save		
	Telecom	Manager	North American Telephone Network LLC		
	Telecom	Manager	Business Long Distance Inc.		
X	Thayer	Diane	Union	603-859-3700	603-859-985
	Thomas	Denise	WorldCom	925-824-2007	925-244-130
X	Thomas	John			
	Thomas	Bill	GT Com	850-229-7222	850-227-736
	Tirador	Judy	Omnipoint Communications	973-290-2411	973-290-244
	Walker	Jeffrey	Preferred Carrier Services, Inc.	972-503-3388	972-503-338
X	Walls	Myra	Bell Atlantic	410-736-6035	410-736-606
	Wieners	Paul	CTC Communications	781-466-1231	781-466-126
	Wiginton	Bill	Pagenet	972-801-8051	972-801-896
	Willis	Eleanor	Winstar Telecommunications, Inc.	202-530-7656	202-530-097
X	Wood	Richard	Granite State Telephone	603-529-6240	603-529-102

Init	Last Name	First Name	Company	Phone	Fax
	Yahemiak	Jack	Brooks/WorldCom	207-228-1010	207-761-994

603 NPA NEW HAMPSHIRE JEOPARDY and RELIEF INDUSTRY MEETING
Thursday, January 7, 1999

Executive Court Conference Center (603) 626-4788
1199 South Mammoth Road, Manchester, New Hampshire 03109

8:30 Registration

8:45 Welcome and Introductions

8:50 NANPA Transition – NANPA's Role and Responsibilities

9:00 Minutes and "Statements For the Record"

9:10 NPA Relief Meeting Overview and Summary of "What to Expect"

9:20 How the Industry Guidelines Pertain to NPA Relief Planning // Goals and Objectives for Today

9:45 Review November 19, 1998 *DRAFT* Industry Meeting Notes

10:15 Review Initial Planning Document

11:30 BREAK

11:45 Additional Alternatives from the Industry

12:00 Elimination of Alternatives

12:30 LUNCH (On Your Own)

1:30 Elimination of Alternatives

2:00 Consensus on Relief Alternative

2:10 Consensus on Dialing Plan and Implementation Intervals/ Industry Commitment for Test Number

2:30 Review Interim Jeopardy Procedures

2:45 NANPA Tutorial of Code Conservation Measures

3:30 BREAK

3:45 Edit Extraordinary Code Conservation Measures Based on Contributions from the Industry

603 NPA NEW HAMPSHIRE RELIEF AND JEOPARDY INDUSTRY MEETING
Thursday, January 7, 1999

4:30 **Consensus on NANPA Filing Industry Efforts with Commission**

4:40 **Set Date for Conference Call to Approve Minutes and/or Conclude Extraordinary Code Conservation Measures**

4:45 **Complete NANPA Survey**

5:00 **Adjourn**

Initial Planning Document

For Relief of New Hampshire: 603 NPA

North American Numbering Plan Administration

Prepared by: Pamela Kenworthy
NPA Relief Planner

November 19, 1998

603 NPA Relief Alternatives

Overlay Alternative

A new NPA code would be assigned to the same geographic area as the existing 603 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing 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 603 NPA all code assignments will be made in the overlay area code.
Total codes at Exhaust = 749
Area code life in years = 6.2 to 12.4

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

Merrimack, Hillsborough & Rockingham Plan – Assumption #1
Split boundary line runs along rate center boundaries on top of these three county boundary lines.

Some of the larger exchanges include:

Area A	Manchester	Nashua	Merrimack

Total codes at Exhaust = 399
Area code life in years = 5.5 to 11.1

Area B	Dover	Laconia

Total codes at Exhaust = 350
Area code life in years = 7.0 to 13.9

Alternative # 3

Sullivan, Merrimack, Cheshire & Hillsborough Plan – Assumption #1
Split boundary line encompasses four counties and runs along rate center boundary.

Some of the larger exchanges include:

Area A	Manchester	Nashua	Merrimack

Total codes at Exhaust = 353
Area code life in years = 7.0 to 13.9

Area B	Dover	Portsmouth	Laconia

Total codes at Exhaust = 396
Area code life in years = 5.6 to 11.1

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #1
Single Overlay

Alt #1	Projected Regular Life
603	6.2 years to 12.4 years

NPA Boundary

Rate Center Boundaries

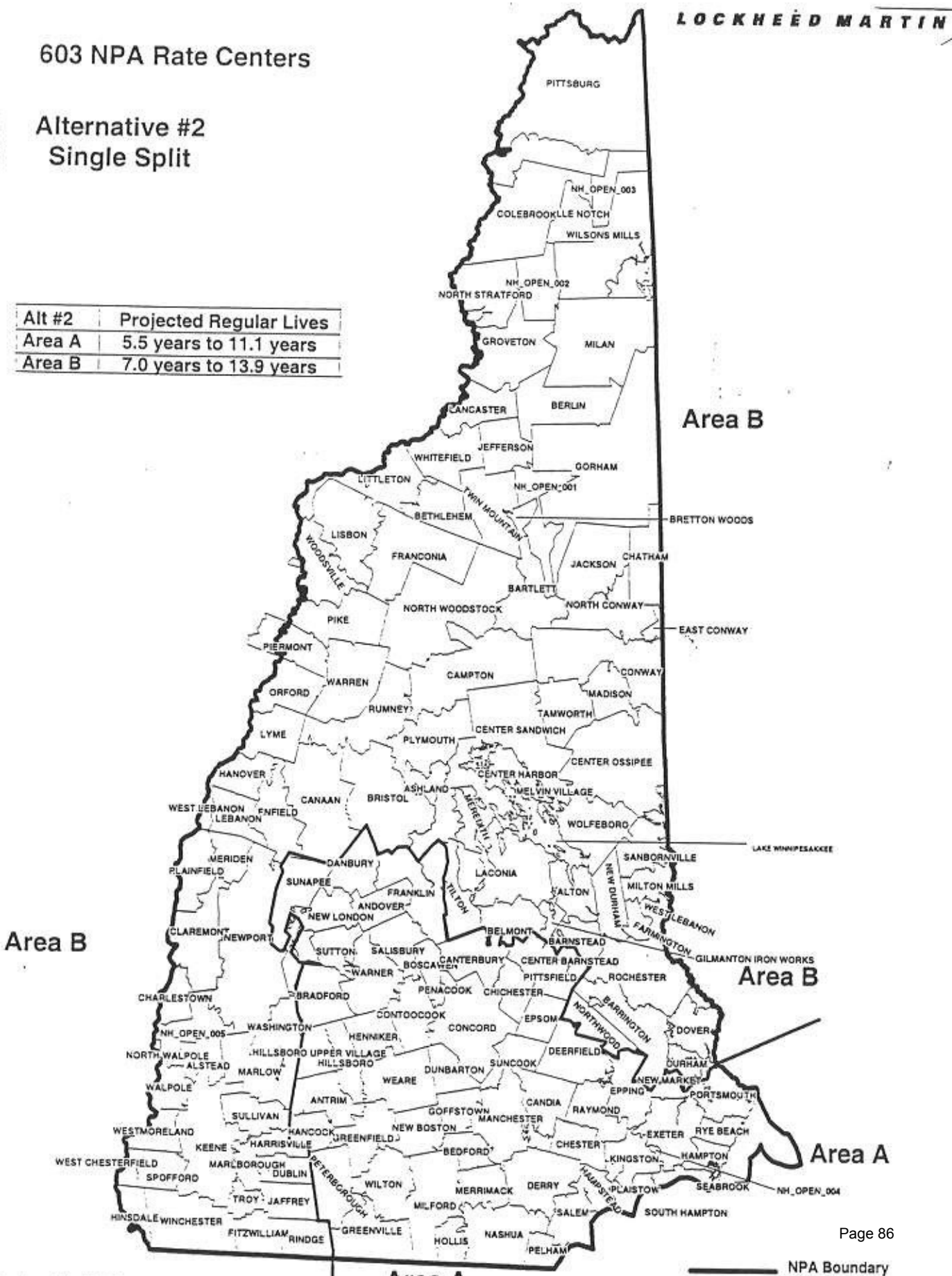
Produced by NANPA

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #2
Single Split

Alt #2	Projected Regular Lives
Area A	5.5 years to 11.1 years
Area B	7.0 years to 13.9 years



Produced by NANPA

NPA Boundary

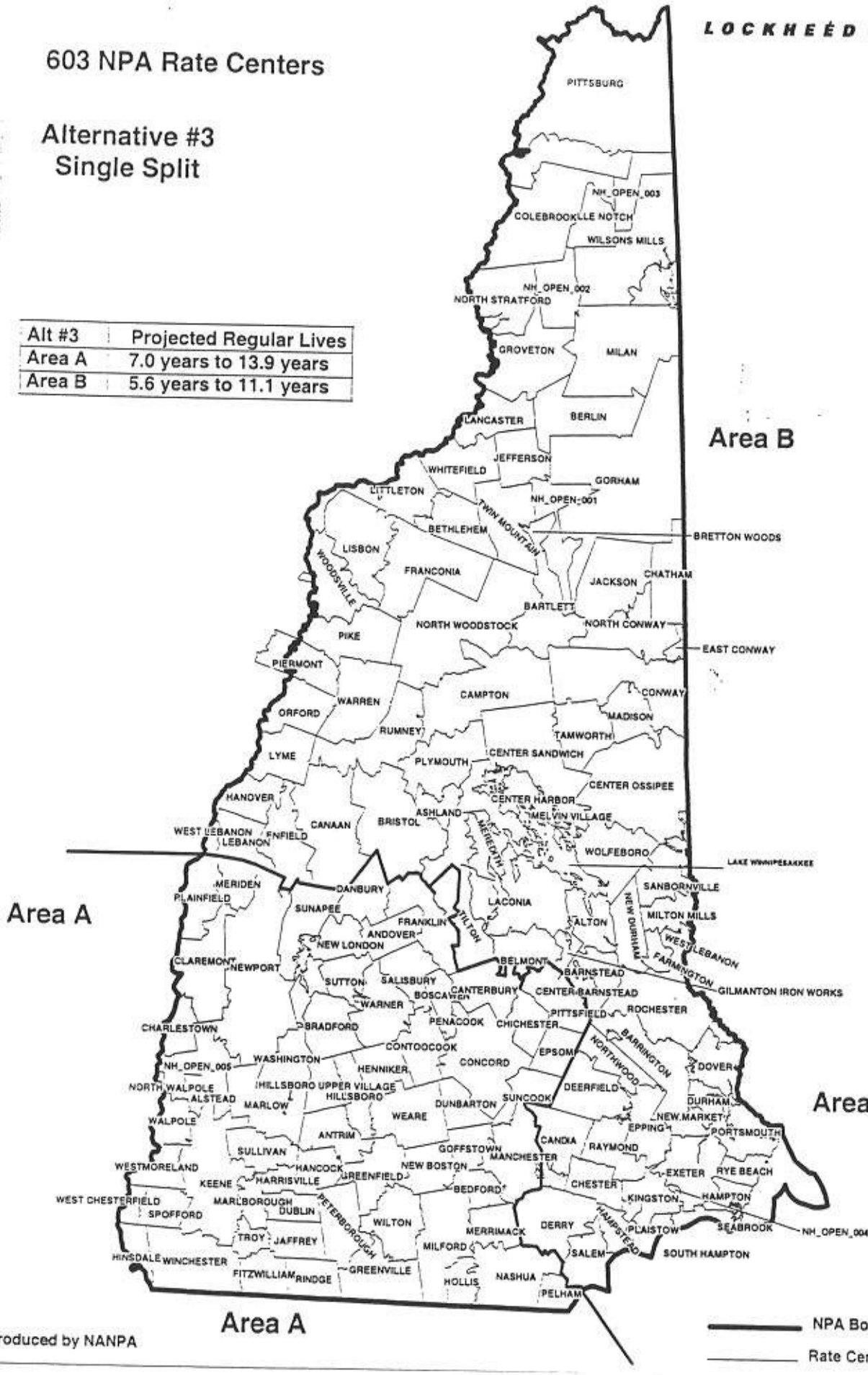
Rate Center Boundaries

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #3
Single Split

Alt #3	Projected Regular Lives
Area A	7.0 years to 13.9 years
Area B	5.6 years to 11.1 years



NPA Boundary

Rate Center Boundaries

Produced by NANPA

Attachment #2

LOCKHEED MARTIN

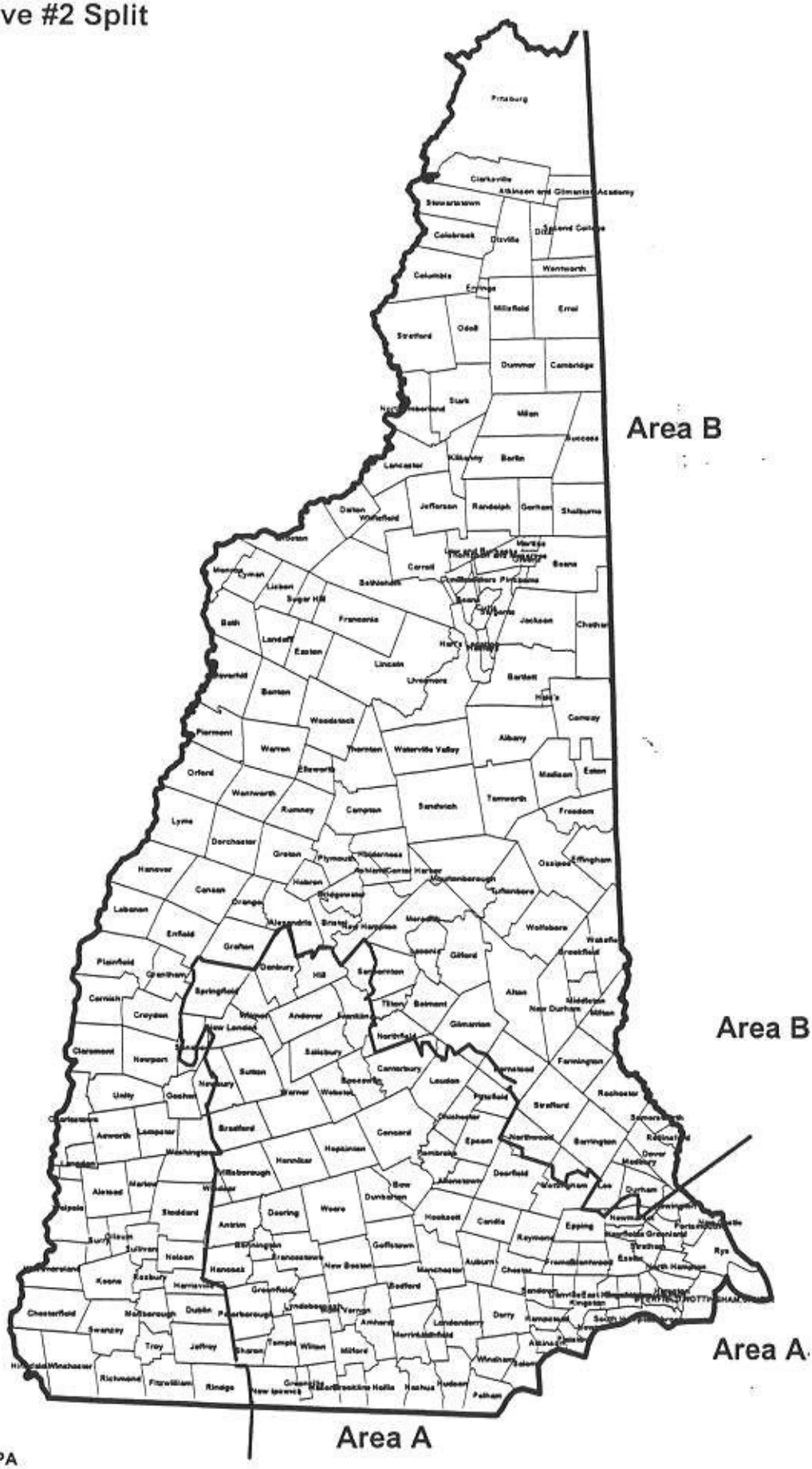
603 NPA County Boundaries
Alternative #2 Split

Produced by NANPA

603 NPA Municipal Boundaries
Alternative #2 Split

Attachment #2

LOCKHEED MARTIN



Produced by NANPA

603 NPA County Boundaries
Alternative #3 Split

Attachment #2

LOCKHEED MARTIN

Produced by NANPA

603 NPA Municipal Boundaries
Alternative #3 Split

Attachment #2

LOCKHEED MARTIN

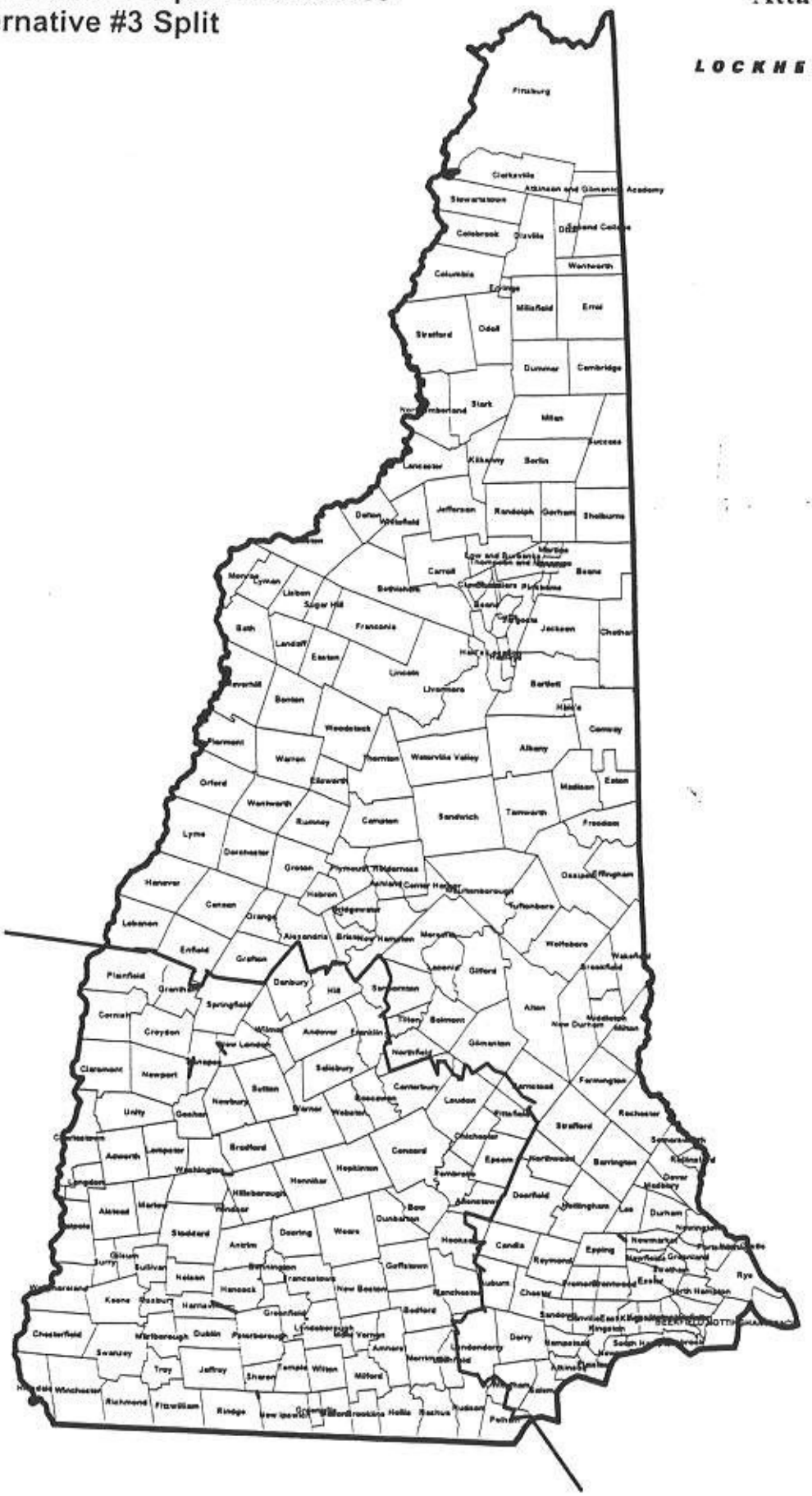


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EXHIBIT C

LOCKHEED MARTIN

603 NPA Rate Centers

Alternative #1
Single Overlay

Alt #1	Projected Regular Life
603	6.2 years to 12.4 years

NPA Boundary

Rate Center Boundaries

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