



State of Alabama

ALABAMA PUBLIC SERVICE COMMISSION
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LUCY BAXLEY, PRESIDENT

JAN COOK, ASSOCIATE COMMISSIONER

SUSAN D. PARKER, PhD, ASSOCIATE COMMISSIONER

WALTER L. THOMAS, JR.

SECRETARY

Re: PETITION OF NEUSTAR, INC. ON BEHALF OF)
THE ALABAMA TELECOMMUNICATIONS)
INDUSTRY FOR RELIEF OF THE 256) DOCKET 31095
NUMBERING PLAN AREA)

ORDER

BY THE COMMISSION:

I. Introduction/Background

The 2008 Number Resource Utilization Forecast (NRUF) and NPA Exhaust Analysis indicate that the 256 NPA will exhaust during the second quarter of 2011. The 256 NPA was declared to be in jeopardy on September 20, 2007, resulting in code rationing. At the time that code rationing was ordered, the 2007 NRUF projected that 256 would exhaust by the fourth quarter of 2010. Consequently, code rationing has already extended the exhaust date by two additional quarters.

Based upon the fourth quarter 2010 projected exhaust date, NeuStar, Inc. – the North American Numbering Plan Administrator (NANPA) - convened an Industry relief meeting on November 8, 2007, to address relief for the 256 NPA. Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document containing area code relief planning options which consisted of an all-services distributed overlay (‘overlay’) and possible alternatives for a two-way area code geographic split. The industry reached consensus that NeuStar petition the Commission on behalf of the Alabama telecommunications industry and recommend approval to utilize an overlay for relief of the 256 NPA.

An overlay is simply adding a new NPA to the same geographic region where the exhausting NPA exists. It’s called an “all services” distributed overlay because the new area code

is not technology specific. In other words, states may not reserve the exhausting area code only for wireline services and require that all wireless services use the new area code. New customers may be assigned a telephone number from either the new area code or the one over which the overlay is being applied (if numbers in that area code are available). Because more than one area code is utilized within the same geographic region, employing an overlay requires that the area code be dialed for all calls, even those that are local. The advantage of using an overlay is that no one is required to change their area code.

On December 19, 2007, NeuStar, Inc. filed with the Commission a Petition of the North America Numbering Plan Administrator, on Behalf of the Alabama Telecommunications Industry.

NeuStar's Petition is as follows:

"NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"), in its role as the neutral third party NPA Relief Planner for Alabama under the North American Numbering Plan and on behalf of the Alabama telecommunications industry ('Industry') requests that the Alabama Public Service Commission ('Commission') approve the Industry's unanimous consensus decision to recommend to the Commission an all-services distributed overlay as the preferred form of relief for the 256 numbering plan area ('NPA')." ¹

"In order to allow sufficient time for implementation of the selected relief plan prior to exhaust of CO codes in the 256 NPA, the Industry requests that the Commission also approve the recommended 15-month implementation schedule." ²

On page 4 of the Petition, the Industry lists the following reasons for choosing the all-services distributed overlay plan over the geographic split alternatives:

1. All existing customers would retain the 256 area code and would not have to change their telephone numbers;
2. Does not discriminate against customers on different sides of a boundary line as does a geographic split;
3. Less customer confusion and easier education process;
4. Provides the most efficient distribution of numbering resources by allowing assignments to follow demand;
5. Less financial impact to business customers because there is no need to change signage, advertising, and stationery;

¹ Petition of NeuStar, Inc., to the Commission dated December 19, 2007, p. 1.

² Petition, p. 2.

6. No need for synchronization of old and new NPAs in Number Portability Administration Center (NPAC) databases;
7. Easier for service providers to implement from a translations, billing, and service order perspective;
8. Minimizes call routing issues, especially with ported numbers;
9. Minimal data entries handled in national databases such as the LERG and the Terminating Point Master Table; and,
10. Customers do not have to update personal printed material such as checks and websites, etc.

On page 6 of the Petition, the Industry recommends a 15-month schedule for implanting the Overlay that includes the following events:

1. Network preparation period: 7 months;
2. Start of permissive 10 digit dialing and customer education period (calls within the 256 NPA can be dialed using either 7 or 10 digits): 7 months;
3. First code activation after end of permissive dialing period: 1 month.

At its February 3, 2009, monthly Meeting, the Commission announced to the State press in attendance that it would be considering the issue of area code relief for the 256 NPA at its March 3, 2008, monthly meeting. A briefing on the proposed 256 area code relief was made available to the general public and the website link provided to the media. During the ensuing month following publication of that information, the staff answered questions from the general public about the proposed area code relief plan.

The Commission concurs with NANPA and the Alabama telecommunications industry that the all-services distributed overlay is the preferred method for relief of numbering exhaust in the NPA 256 region and with the 15-month implementation schedule proposed by the Industry.

IT IS, THEREFORE, ORDERED BY THE COMMISSION, that the all-services distributed overlay as recommended in NeuStar's petition for relief of numbering exhaust in NPA 256 is hereby approved.

IT IS, FURTHER ORDERED BY THE COMMISSION, that the proposed schedule for implementing the overlay is hereby approved.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DATED at Montgomery, Alabama, this 3rd day of March, 2009.

ALABAMA PUBLIC SERVICE COMMISSION



Lucy Baxley, President



Jan Cook, Commissioner



Susan D. Parker, Commissioner

ATTEST: A True Copy



Walter L. Thomas, Jr., Secretary