

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee 37243**

NeuStar, Inc., in its role as North American)	
Numbering Plan Administrator)	
)	Docket No. 11-00018
Petition for Approval of Numbering Plan)	
Area Relief Plan for the 615 NPA)	

**COMMENTS OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR**

NeuStar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Tennessee under the North American Numbering Plan, hereby responds to the Tennessee Regulatory Authority’s (“Authority”) request for comments regarding the area code relief plan for the 615 numbering plan area (“NPA”) code.¹ In its *Notice*, the Authority sought comments from the NANPA, Tennessee telecommunications industry (“Industry”),² and other interested parties as to whether the Petition³ filed by NANPA in the above-referenced docket should be dismissed due to exhaust projections for the 615 NPA issued by NANPA in October 2011. Based upon new information, including a new exhaust projection recently published by the NANPA, the NANPA recommends that the Commission not dismiss the Petition.

¹ *Notice of Filing Comments*, Docket No. 11-00018 (Feb. 29, 2012) (“*Notice*”).

² The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 615 area code of Tennessee.

³ Petition of the North American Numbering Plan Administrator on Behalf of the Tennessee Telecommunications Industry for Approval of Numbering Plan Area Relief Plan for the 615 NPA, Docket No. 11-00018 (Jan. 31, 2011) (“*Petition*”).

Neustar filed the Industry's Petition on January 31, 2011 requesting approval of the Industry's consensus decision to recommend an all services overlay as relief for the 615 NPA and that the relief be implemented according to the Industry's recommended 15-month schedule.⁴ As noted by the Authority in its *Notice*, the Petition was based upon NANPA's October 2010 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis ("2010 NRUF Report") projection that, absent relief, the supply of central office codes for the 615 NPA would exhaust during fourth quarter 2013. In the regular course of its business, NANPA updates and publishes its NRUF Report twice a year, generally in October and April, setting forth the exhaust projections for all United States area codes, based upon updated information submitted biannually by telecommunications service providers. As part of this effort, using service provider forecasted information provided in July 2011, NANPA updated its exhaust projection for the 615 NPA to third quarter 2016. The projected exhaust was moved out based upon lower demand for numbering resources forecasted by the Industry and also upon lower historic demand in recent months. NANPA published this exhaust projection in October 2011.

The next regularly scheduled release of updated exhaust projections is April 2012. However, upon receiving the Authority's *Notice*, NANPA calculated a revised exhaust projection for the 615 NPA based upon data submitted by the Industry in January 2012 and published this projection on March 9, 2012.⁵ This newly projected exhaust for the 615 NPA is second quarter 2015. Given the new projected exhaust date of second quarter 2015, if the

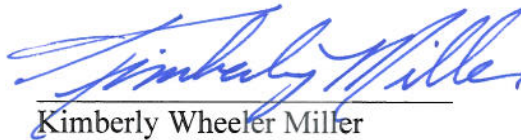
⁴ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

⁵ NANPA published this new projected exhaust date on the NANPA website and distributed notification to the Industry.

Authority were to dismiss the Petition, NANPA immediately would begin relief planning and file a new petition with the Authority as soon as possible.⁶

In light of the advancement of more than a year in the projected exhaust date for the 615 NPA, NANPA recommends that the Authority not dismiss its Petition.

Respectfully submitted,



Kimberly Wheeler Miller

NeuStar, Inc.
1775 Pennsylvania Avenue, N.W., 4th Floor
Washington, D.C. 20006
(202) 533-2912 (phone)
(202) 533-2972 (fax)
Kimberly.miller@neustar.biz

Wayne Milby
Sr. NPA Relief Planner
NeuStar, Inc.
North American Numbering Plan Administrator
21575 Ridgetop Circle
Sterling, VA 20166
(804) 795-5919
Wayne.milby@neustar.biz

Filed March 16, 2012

⁶ NANPA must begin relief planning 36 months prior to the projected exhaust of an area code.