

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

October 23, 2013

IN RE:)
)
PETITION OF THE NORTH AMERICAN NUMBERING) DOCKET NO.
PLAN ADMINISTRATOR ON BEHALF OF THE) 11-00018
TENNESSEE TELECOMMUNICATIONS INDUSTRY)

ORDER

This matter came before Vice Chairman Herbert H. Hilliard, Director Kenneth C. Hill and Director David F. Jones of the Tennessee Regulatory Authority (the “Authority” or “TRA”), the voting panel assigned to this docket, at a regularly scheduled Authority Conference held on October 21, 2013, for consideration of the *Petition of the North American Numbering Plan Administrator on Behalf of the Tennessee Telecommunications Industry* (“*Petition*”) filed by Neustar, Inc., the North American Numbering Plan Administrator (“NANPA”), on January 31, 2011. NANPA is the neutral third-party NPA Relief Planner for Tennessee under the North American Numbering Plan.¹ In the *Petition*, NANPA, acting on behalf of Tennessee telecommunications industry (“Industry”),² sets forth three options to address the impending exhaustion of the supply of central office codes in the 615 area code, or numbering plan area (“NPA”), and requests approval of Industry’s consensus recommendation for an all-services distributed overlay of the 615 NPA, as more fully described below.

¹ *Petition*, p. 1 (January 31, 2011).

² Industry is composed of current and prospective telecommunications carriers within the 615 area code. NANPA has no independent view regarding the relief option selected by Industry. *See Petition*, p. 1 (January 31, 2011).

BACKGROUND

Tennessee currently has six NPAs. The 615 NPA, created in 1954, covers the north-central portion of the state and is comprised of 49 rate centers.³ On July 17, 2000, NANPA advised the Authority that it had declared the 615 NPA in jeopardy. The Federal Communications Commission (“FCC”) delegated the authority to implement thousand-block number pooling to the TRA on July 20, 2000. To conserve numbering resources and expand the life of the 615 NPA, the TRA issued an order to implement thousand-block number pooling on December 12, 2000. Due to technical problems, implementation was delayed and mandatory thousand-block number pooling was implemented for the 615 NPA on March 14, 2002.⁴

Based upon the projected exhaust of the 615 NPA in the October 2010 Number Resource Utilization Forecast and NPA Exhaust Analysis, on October 7, 2010, NANPA notified the TRA and Industry that 615 NPA relief needed to be addressed.⁵ NANPA distributed an Initial Planning Document to Industry, which contained descriptions, maps, general facts and assumptions and the projected lives of three relief alternatives.⁶

A Relief Plan Meeting was conducted on December 13, 2010, with Industry members and NANPA staff members attending by conference call.⁷ The *Petition* states that three alternatives were studied. Alternative Number 1 is an all-services distributed overlay, where a new NPA would be assigned to the same geographic area occupied by the existing 615 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and

³ *Petition*, p. 3 and Exhibit A, pp. 2-3 (January 31, 2011). The *Petition* further notes that the Nashville rate center alone accounts for 406 of the 682 central office codes assigned in the 615 NPA.

⁴ *See In re: Telephone Number Pooling*, Docket No. 00-00851, *Order Amending the December 12, 2000 Order Implementing 1000 Block Pooling in the 615 Area Code*, pp. 2-4 (March 25, 2002).

⁵ *Id.* at 2. The FCC has delegated authority to review and approve NPA relief plans to the states *See* 47 C.F.R. § 52.19. When the *Petition* was filed, NANPA forecasted that the 615 NPA would exhaust numbering resources in the fourth quarter of 2013. In October 2011, the forecasted exhaustion date for the 615 NPA was the third quarter of 2016, which delayed consideration of the *Petition*. NANPA’s current forecast indicates the 615 NPA will exhaust during the second quarter of 2015.

⁶ *Petition*, p. 2 (January 31, 2011).

⁷ *Id.* at Exhibit A.

between NPAs in the affected area would be required. Alternative Number 1 has a projected life of nineteen years.⁸

Alternative Number 2 is an NPA split, where the exhausting NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.⁹ The proposed split boundary line would run around the Nashville rate center. The Nashville rate center would have a projected life of thirteen years and the remainder of the 615 rate centers would have a projected life of twenty-eight years.¹⁰

Alternative Number 3 is a concentrated overlay, where a concentrated-overlay would be distributed across only the Nashville rate center. This option would be short-lived, since it would require expansion of the overlay in 1.7 years.¹¹

During the Relief Plan Meeting, Industry chose by consensus to recommend Alternative Number 1, the all-services distributed overlay, along with a fifteen-month implementation interval as the preferred method of relief for the 615 NPA.¹² According to the *Petition*, the all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 615 NPA, so that existing customers would not have to change their telephone numbers. When the 615 NPA exhausted, all central office code assignments would be made from the new overlay NPA. This plan would require ten-digit dialing for all calls within and between the 615 NPA and the new NPA. Toll calls would be dialed as 1+10 digits and operator services calls would be dialed as 0+10 digits.¹³

At the May 6, 2013 Authority Conference, Chairman Allison directed TRA Staff to: (1) provide language on the TRA's website adequately explaining the 615 area code exhaustion; (2)

⁸ *Id.* at 3.

⁹ *Id.* at Exhibit A, p. 5.

¹⁰ *Id.* at 3.

¹¹ *Id.* at 4.

¹² *Id.* at 4-5.

¹³ *Id.*

make a survey available on the TRA's website whereby consumers can also make comments on the issue; (3) provide a telephone extension designated to receive consumer calls for the purpose of mailing out information and surveys; (4) issue press releases advising consumers of the information and survey available on the website, as well as the designated telephone number to call to receive such information; and (5) work with the telephone companies to place language on consumers' bills advising them of the information and survey available on the TRA's website and the designated TRA telephone number to call to receive such information.¹⁴

TRA Staff complied with this directive by adding a PowerPoint presentation and a survey form to the TRA website; providing a dedicated telephone extension to survey form requests; issuing press releases and media advisories; participating in radio and television interviews and programs; and contacting telephone companies to discuss placing inserts in customers' bills referring 615 area code questions to the TRA. Additionally, TRA Staff attended three separate regional County Commissioners meetings where information concerning the 615 relief options was shared and information pamphlets were made available to the Commissioners for distribution to their constituents. TRA Staff also provided survey forms to consumers at public outreach meetings.

The TRA received approximately 3,000 total responses to the area code survey. Of these responses, 83.2% preferred an all-services distributed overlay and 16.8% preferred an NPA split.¹⁵ Comments from interested parties were also filed in this docket.

FINDINGS AND CONCLUSIONS

At the regularly scheduled Authority Conference held on October 21, 2013, members of the public were invited to make comments on the merits of the options under consideration. The panel then considered the merits of the *Petition*. The panel found that the all-services distributed overlay, where existing customers would retain the 615 NPA and their current seven-digit telephone number, would have the least disruption to consumers and Industry alike. In addition, according to NANPA,

¹⁴ See Transcript of Proceedings, pp. 5-6 (May 6, 2013).

¹⁵ See Memorandum to File from John Hutton (October 17, 2013).

that option is the only alternative that will meet the requirements set forth in the NPA Code Relief Planning and Notification Guideline.¹⁶ The panel also noted that the North American Numbering Council, at its September 18, 2013, quarterly meeting, approved the proposal of its Local Number Portability Administration Working Group to transmit a recommendation to the FCC to adopt overlays as an industry “Best Practice”. The recommendation included fifteen benefits of an all-services overlay.¹⁷ Furthermore, the panel found that over 83% of respondents to the Authority’s Area Code Survey preferred the all-services distributed overlay alternative.

Based upon these findings and after careful review of the *Petition* and the information contained in the docket file, the panel determined that an all-services distributed overlay is the best option for number relief of the 615 NPA and a fifteen-month implementation interval will be in the best interest of consumers as well as providers. Therefore, the panel voted unanimously to approve the *Petition*.

IT IS THEREFORE ORDERED THAT:

The *Petition* is approved, and the all-services distributed overlay method of relief for the 615 numbering plan area and fifteen-month relief implementation schedule proposed by the Tennessee telecommunications industry are adopted.

Vice Chairman Herbert H. Hilliard, Director Kenneth C. Hill and Director David F. Jones concur.

ATTEST:



Earl R. Taylor, Executive Director

¹⁶ *Petition*, Exhibit A, p. 4 (January 31, 2011).

¹⁷ *Comments of the Joint Telecommunications Providers*, Exhibit A (September 25, 2013).