

STATE OF TENNESSEE

Office of the Attorney General



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April 26, 2023

Chairman Herbert H. Hilliard  
c/o Ms. Tory Lawless, Docket Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37242-0001

Electronically Filed in TPUC Docket  
Room on April 26, 2023 at 12:55 p.m.

Re: Tennessee Public Utility Commission, Docket No. 22-00128, *Petition of the North American Numbering Plan Administrator on Behalf of the Tennessee Telecommunications Industry for Relief of the 423 NPA*

Dear Chairman Hilliard:

On November 18, 2022, the North American Numbering Plan Administrator (“NANPA”) filed *Petition of the North American Numbering Plan Administrator on Behalf of the Tennessee Telecommunications Industry for Relief of the 423 NPA* (“*Petition*”) and testimony in support of this *Petition*. In this filing, NANPA is seeking relief for the 423 area code, which covers two non-contiguous areas in eastern Tennessee and is projected to exhaust its central office codes (often referred to as “CO” or “NXX” codes) during the third quarter of 2025.<sup>1</sup> NANPA then distributed a notice to the Tennessee telecommunications industry (the “Industry”) on September 12, 2022, containing an initial planning document, which included two alternatives for relief, an all-services distributed overlay and a geographic split, for review prior to the relief planning meeting.<sup>2</sup> The Industry met via web conference on October 11, 2022 and after review of the relief alternatives, reached consensus to recommend Alternative #1, the all-services distributed overlay of the 423 NPA.<sup>3</sup>

The Consumer Advocate Division of the Tennessee Attorney General’s Office (“Consumer Advocate”) has reviewed the *Petition* and the accompanying comments filed within this Docket and respectfully expresses its support of the alternatives provided by NANPA as well as the Industry’s recommended relief alternative. In its review, the Consumer Advocate also

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<sup>1</sup> *Petition of the North American Numbering Plan Administrator on Behalf of the Tennessee Telecommunications Industry for Relief of the 423 NPA*, TPUC Docket No. 22-00128 (November 18, 2022), at 1.

<sup>2</sup> *Id.* at 3.

<sup>3</sup> *Id.*

respectfully expresses its intent not to intervene at this time in this proceeding. The Consumer Advocate's opinion or expression of intent may not be used for any purpose other than the expression of intent not to intervene stated herein.

The Consumer Advocate requests that this letter be filed in this Docket.

Respectfully,

A handwritten signature in black ink, appearing to read 'Victoria B. Glover', written in a cursive style.

Victoria B. Glover  
Assistant Attorney General

cc: Florence Weber  
Cecilia McCabe  
Melvin Malone, Esq.  
Ryan Freeman, Esq.  
Katie Wagner, Esq.  
Bill Atkinson, Esq.  
William Haas, Esq.  
Monica Smith-Ashford, Esq.