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SARA KYLE, COMMISSIONER
TN REGULATORY AUTHORITY

By Overnight Courier

The Honorable Sara Kyle
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Docket No. 99-00784

Dear Chairman Kyle:

NeuStar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby notifies the Tennessee Regulatory Authority ("TRA") that the 615 numbering plan area ("NPA") code is not projected to exhaust within the next five years. As such, pursuant to industry guidelines, the Industry¹ or the TRA may request in writing to NANPA that the NPA relief plan for the 615 NPA be withdrawn.

On August 31, 1999, NANPA filed a notification ("Notification") in the above-referenced docket on behalf of the Industry requesting that the TRA approve the Industry's recommended all-services distributed overlay relief plan. The Notification stated that according to the 1999 Central Office Code Utilization Survey and NPA Exhaust Analysis, the 615 NPA was projected to exhaust during the fourth quarter of 2000. On June 2, 2003, NANPA released the 2003 NRUF and NPA Exhaust Analysis ("2003 NRUF Analysis"), which incorporated updated actual and projected demand for numbering resources submitted to NANPA by the Industry. According to the 2003 NRUF Analysis, the 615 projected exhaust date was pushed back to fourth quarter 2010.² The extension of the projected exhaust is due in part to the implementation of thousands block pooling in March of 2002, and a continued decrease in demand for numbering resources.

¹ The Industry is comprised of telecommunications entities operating in or considering operations within the 615 NPA in Tennessee.

² 2003 NRUF and NPA Exhaust Analysis (June 2, 2002) ("2003 NRUF Analysis"). Due to a change in Federal Communications Commission regulations, the NRUF Analysis replaced the Central Office Code Utilization Survey in 2000. See, *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 00-104 (March 31, 2000) at ¶5.

The Industry Numbering Committee ("INC") revised the guidelines, which NANPA is required to follow for NPA relief planning purposes, to allow for a mechanism to withdraw NPA relief petitions filed with state commissions if the NPA is not projected to exhaust within five years based upon a non-rationed forecast and the state commission has not approved the petition.³ Pursuant to those guidelines, NANPA hereby notifies the TRA (and the Industry via posting a copy of this letter on NANPA's Document Distribution Service) that 1) the projected exhaust date for the 615 NPA is more than five years from the date of this letter, 2) the NPA is not in jeopardy, 3) the TRA has not yet acted on the Industry's Notification, and 4) 200 central office codes remain available for assignment in the 615 NPA. As such, if NANPA receives a written request from the TRA or at least two Industry members⁴ to rescind the Notification, NANPA expeditiously will convene an Industry conference call for the purpose of gaining Industry consensus to withdraw the relief plan and forward the results of that meeting to the TRA.

³ The guidelines state:

During the period of time after NANPA has filed an industry relief plan recommendation with a regulatory authority but before the regulator has approved the plan, the NANPA may determine that the NPA will not exhaust in the next five years based on a non-rationed forecast. Events may have taken place such as a reduction in code demand, the return of codes, and or the implementation of number conservation, e.g., rate center consolidation, number pooling, that result in moving the NPA exhaust forecast outward significantly into the future.

NANPA will notify the industry and regulatory authorities when such a determination is made. In this notification, NANPA will provide the number of codes available in the NPA and a new projected NPA exhaust date. Upon notification from the NANPA, local industry (per section 5.5.1) or a regulatory authority may request in writing that the NPA relief plan be rescinded. If requested by a state regulator or the industry to withdraw a filed, unapproved relief plan, NANPA will convene a conference call for the purpose of gaining industry consensus to withdraw the relief plan petition under the following conditions:

- (a) The forecasted exhaust of the NPA is at least five years in the future, and,
- (b) The NPA is not in jeopardy.

NPA Code Relief Planning & Notification Guidelines, INC97-0404-016, §5.10 (Industry Numbering Committee, August 16, 2002) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines can be accessed on the Alliance for Telecommunications Industry Solutions at www.atis.org.

⁴ NPA Relief Planning Guidelines at §5.5.1.

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Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,

A handwritten signature in black ink, reading "Kimberly Miller". The signature is written in a cursive style with a large, stylized "K" and "M".

Kimberly Wheeler Miller
Director, Regulatory Law and Public Policy

cc: Interested Industry members
(via NANPA's Document Distribution Service)