

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

DECEMBER 10, 1999

IN RE:

**AREA CODE CONSERVATION
MEASURES IN TENNESSEE**

DOCKET NO. 99-00784

**REQUEST TO NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
TO DEVELOP AN INDUSTRY VOLUNTARY ALLOCATION PLAN AND TO
PROVIDE PERIODIC REPORTS TO THE TENNESSEE REGULATORY
AUTHORITY ON NXX CODE REQUESTS**

This matter came before the Tennessee Regulatory Authority ("TRA" or "Authority") at a regularly scheduled Authority Conference held on December 7, 1999, for the purpose of reviewing the current status of area code conservation measures in the 615 and 901 area codes. After considering the status, the Directors of the Authority unanimously found that the immediate need to provide relief to the 615 area code has eased and that the 901 area code is now nearing exhaustion. The Authority determined not to recommend a relief plan for the 615 area code at this time. Instead, the Authority decided to issue a request to the North American Numbering Plan Administrator ("NANPA") to conduct a meeting of all Tennessee telecommunications service providers for the purpose of developing an industry voluntary allocation plan for NXX code assignment in the 615 and 901 area codes, with the objective of the plan to extend the life of both the 615 and 901 area codes until the fourth quarter of 2003, at a minimum. The Authority also requested NANPA to report back to the Authority at the first Authority Conference in February 2000 on its meeting and the developments concerning the

industry voluntary allocation plan. Finally, the Authority requested that NANPA regularly report to the Authority the names of telecommunications service providers requesting NXX codes in the 615 and 901 area codes, together with the number of NXX codes requested.

Background

On February 2, 1999, the Authority requested that the Tennessee Telecommunications Association form an Area Code Conservation Task Force to research and explore options and measures to best conserve numbering resources. On June 14, 1999, NANPA notified the Authority that the 615 area code would exhaust during the fourth quarter of the year 2000. Soon thereafter, NANPA, the telecommunications industry and the Authority began discussing various alternatives for area code relief. In addition, the Authority undertook certain educational and informational measures to alert and inform the public.

At a regularly scheduled Authority Conference held on October 12, 1999, the Directors of the Authority unanimously resolved to petition the Federal Communications Commission ("FCC") for authority to implement number conservation measures, including, but not limited to, thousands-block pooling and NXX code reclamation. In conjunction with this action, on October 15, 1999, the Authority issued a Request to all affected and relevant Tennessee telecommunications service providers, including cooperatives, to consider taking voluntary measures towards area code conservation, including, but not limited to, voluntarily reviewing their NXX code inventories and voluntarily returning non-utilized or otherwise dormant NXX

codes to NANPA. This Request was served on thirty-two (32) wireless carriers and Incumbent Local Exchange Carriers (ILECs) and Competing Local Exchange Carriers (CLECs) authorized to conduct business in Tennessee.

On November 16, 1999, the Authority filed a petition with the FCC seeking additional delegated authority to implement numbering conservation measures. Specifically, the TRA requested that the FCC delegate authority to the TRA to: enforce current and new numbering allocation standards; maximize the efficiency of number use practices within NXX codes by setting fill rates and by requiring utilization surveys; reclaim unused and reserved NXX codes and portions of those codes; order number utilization and forecasting reporting, and audit such reporting; and implement mandatory thousands-block number pooling. Copies of the Authority's Request and the Petition to the FCC are attached hereto as Attachments A and B, respectively.

Findings and Conclusions of the Tennessee Regulatory Authority

The estimated exhaust time for the 615 and 901 area codes is based largely upon two factors: the remaining number of available NXX codes for assignment and the average monthly assignment of NXX codes. Since the issuance of the Authority's October request, at least forty (40) NXX codes have been either reclassified or returned to NANPA for assignment in the 615 area code. The addition of these codes resulted in the 615 area code having more available NXX codes in November 1999 than existed in July 1999. NANPA has also reported that an additional forty-eight (48) NXX codes may be returned for assignment in the 615 area code as well. The

return of any of these codes would further extend the life of the 615 area code. In addition, the average monthly assignment of NXX codes over the past six months has declined. NANPA has reported that from August 1998 to June 1999 the average number of NXX codes being assigned monthly was seven (7). From June 1999 to November 1999, NANPA reports that the average number of assignments has decreased to less than five (5) NXX codes per month.

Based upon the increased number of available NXX codes and the recent drop in monthly NXX code assignments, the Authority concludes that at the present time, the urgent need for area code relief in the 615 area code has subsided. Based upon current usage and available NXX codes, it is possible that the 615 area code will last until the fourth quarter of 2003. At the same time, the Authority has been informed by NANPA that the 901 area code is nearing exhaust. The latest information provided by NANPA indicates that the 901 area code has less available NXX codes for assignment than the 615 area code. NANPA has reported to the Authority that the 901 area code is estimated to exhaust in the third quarter of 2002.

Under existing FCC regulations, while states cannot institute mandatory allocation or rationing of NXX codes, the telecommunications industry can institute, at the urging of state regulatory commissions, voluntarily allocation of NXX codes. Under this approach, the telecommunications industry could meet with representatives of NANPA and voluntarily agree to limit the assignment of NXX codes to a set number each month. NANPA could then limit NXX code assignment to this agreed-upon number with additional requests for NXX codes being deferred to future months.

Based upon the foregoing information, the Directors of the Authority voted unanimously to request that NANPA conduct a meeting of all telecommunications service providers in Tennessee for the purpose of developing an industry voluntary allocation plan for NXX code assignment in the 615 and 901 area codes. The objective of the voluntary plan is to extend the life of both the 615 and 901 area codes until the fourth quarter of 2003. Such a voluntary provision plan would ensure a steady and consistent allocation of NXX codes per month within the two area codes. The Authority requests that the monthly allocation number be no more than the current average assignment number of five (5) NXX codes per month.

The Directors further requested NANPA to report to the Authority, at the first conference in February 2000, the developments concerning the industry voluntary allocation plan. In addition, the Authority decided to request NANPA to provide in a monthly report to the Authority, the names of telecommunications service providers requesting NXX codes in the 615 and 901 area codes together with the number of NXX codes being. The Authority concludes that this action will promote NXX code conservation in the affected area codes.

IT IS THEREFORE REQUESTED THAT:

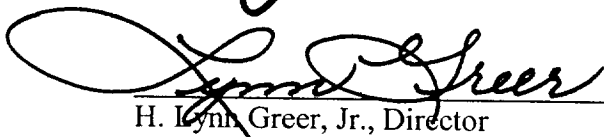
1. The North American Numbering Plan Administrator ("NANPA") conduct a meeting of all telecommunications service providers for the purpose of developing an industry voluntary allocation plan for NXX code assignment in the 615 and 901 area codes, with the objective of the plan to extend the life of both the 615 and 901 area codes until the fourth quarter

of 2003. The Authority requests that the NXX code assignment allocation be limited to five (5) per month;

2. NANPA report to the Authority, at the Authority's first conference in February 2000, the developments concerning the industry voluntary allocation plan; and

3. NANPA provide to the Authority a monthly report of the names of telecommunications service providers requesting NXX codes in the 615 and 901 area codes, together with the number of requested NXX codes.


Melvin J Malone, Chairman


H. Lynn Greer, Jr., Director


Sara Kyle, Director

ATTEST:


K. David Waddell, Executive Secretary

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

October 15, 1999

IN RE:

**AREA CODE CONSERVATION
MEASURES IN TENNESSEE**

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DOCKET NO. 99-00784

**REQUEST TO ALL AFFECTED TELECOMMUNICATIONS SERVICE PROVIDERS
AND COOPERATIVES IN TENNESSEE TO TAKE VOLUNTARY AREA CODE
CONSERVATION MEASURES**

On October 12, 1999, the Tennessee Regulatory Authority ("TRA" or "Authority") unanimously resolved to petition the Federal Communications Commission ("FCC") for authority to implement number conservation measures, including, but not limited to, 1000 block pooling and reclamation.¹ In conjunction with this action, the Authority urged all affected and relevant Tennessee telecommunications service providers, including cooperatives, to consider taking voluntary measures towards area code conservation, including, but not limited to, voluntarily relinquishing any non-utilized or otherwise dormant inventory of NXX codes.

On February 2, 1999, the Authority commissioned the Tennessee Telecommunications Association to form an Area Code Conservation Task Force to research and explore options and

¹ The FCC has been delegated authority by Congress to oversee the North American Numbering System. While the FCC has delegated to the states the authority to select relief plans, it continues to maintain jurisdiction over number conservation measures.

ATTACHMENT A

measures that may be taken for numbering resource conservation.² The Task Force is to report its findings, conclusions, and recommendations to the Authority as soon as is practicable. A report should be issued by the end of the year.

On June 14, 1999, the North American Numbering Plan Administrator (NANPA), Lockheed Martin IMS, notified the Authority that the 615 Numbering Plan Area ("NPA") would exhaust during the fourth quarter of the year 2000. Soon thereafter, NANPA, the Telecommunications industry, and the Authority began discussing various relief alternatives. Additionally, the Authority undertook, and continues to implement, certain educational and informational measures to alert and inform the public.

Recently, MCIWorldCom, Inc. ("MCIWorldCom") announced in a September 28, 1999, letter to the FCC that it was in the process of returning 77 NXX codes – or 770,000 telephone numbers – to NANPA.³ In its announcement, MCIWorldCom urged "all service providers, including CLECs, ILECs, and providers of wireless services, to act prudently" and not maintain an inventory larger than required to meet the needs of customers.

Consistent with the Authority's continuing efforts in identifying and promoting conservation strategies, the Authority hereby urges all affected and relevant Tennessee telecommunications service providers and cooperatives to review their inventories, consider the widespread area code relief activity now under way, and voluntarily return non-utilized or otherwise dormant NXX codes to NANPA.

² The Task Force is composed of both wireline and wireless carriers and Authority Staff. Further, the National Regulatory Research Institute is assisting the Task Force with a number utilization study.

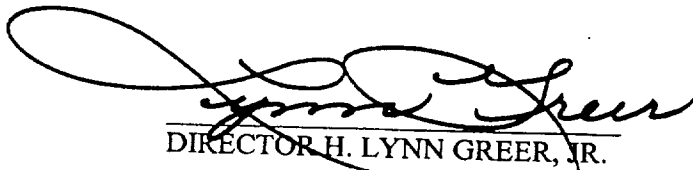
³ Bell Atlantic has also been active in pursuing certain conservation measures.

IT IS THEREFORE REQUESTED THAT:

1. All affected telecommunications service providers and cooperatives in Tennessee consider taking voluntary measures towards area code conversation, including, but not limited to, voluntarily relinquishing any non-utilized NXX codes.
2. Any provider who voluntarily undertakes such measures notify the Authority of the same.


CHAIRMAN MELVIN J. MALONE


DIRECTOR SARA KYLE


DIRECTOR H. LYNN GREER, JR.

ATTEST:


Executive Secretary

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

IN THE MATTER OF

**THE TENNESSEE REGULATORY
AUTHORITY PETITION FOR ADDITIONAL
DELEGATED AUTHORITY TO IMPLEMENT
NUMBERING CONSERVATION MEASURES**

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**PETITION OF THE TENNESSEE REGULATORY AUTHORITY
FOR ADDITIONAL DELEGATED AUTHORITY TO IMPLEMENT NUMBERING
CONSERVATION MEASURES**

The Tennessee Regulatory Authority ("TRA") hereby submits to the Federal Communications Commission ("FCC") its petition for additional delegated authority to implement number conservation measures. The TRA requests authority to implement various measures which would result in a more efficient use of telephone numbers, thereby slowing the pace of area code relief, without having anti-competitive consequences or favoring one segment of the industry over another. Such measures would also protect Tennessee consumers from the disruption of service as well as diminish the economic and social costs of changes associated with the implementation of new area codes.

Specifically, the TRA respectfully requests that the FCC delegate authority to the TRA to:

1. Enforce current numbering allocation standards and establish and enforce new standards.
2. Maximize the efficiency of number use practices within NXX codes by setting fill rates and by requiring utilization surveys.

ATTACHMENT B

3. Reclaim unused and reserved NXX codes and portions of those codes.
4. Order number utilization and forecasting reporting, and audit such reporting.
5. Implement mandatory thousands-block number pooling.

I. BACKGROUND

Tennessee, like many other states, is experiencing a dramatic growth in the demand on its telephone numbering resources. This increased demand has resulted in Tennessee adding three (3) new area codes since 1996, as almost a yearly occurrence. The 423 area code was added in East Tennessee during 1996, while the Middle Tennessee 931 area code was added in 1997. Tennessee is now in the process of implementing the 865 area code to relieve the 423 area code in East Tennessee. Permissive dialing for the 865 area code began on November 1, 1999 with mandatory dialing set to begin April 24, 2000.

More recently, Lockheed Martin, the North American Numbering Plan Administrator ("NANPA"), notified the TRA on June 14, 1999, that Tennessee's 615 area code is likely to exhaust during the fourth quarter of 2000. In an attempt to prepare for this likelihood, the TRA has been studying and conducting open meetings for public comment on the two options available to the TRA: a geographic split or an overlay. Under either option, the maximum relief for the 615 area code is approximately five (5) years, after which additional action will be required. Further, the May 1999 Central Office Code Utilization Survey ("COCUS") report shows that Tennessee's 901 West Tennessee area code and the 931 Middle Tennessee area code will likely exhaust during the third quarter of 2002 and the first quarter of 2007, respectively.

In each of the three previous numbering shortages, the TRA selected, after receiving public comment, a split strategy for relief. In the current 615 area code shortage, the TRA is still in the investigation phase of considering different area code relief strategies. Public comments

received concerning this issue run consistently against adding new area codes. The current methods available to the TRA for dealing with numbering resources are not effective. Consumer dissatisfaction regarding the lack of action on numbering conservation is increasing to the point that it could erode the public's support for the increase of competition in the telecommunications sector. Decisive action by regulatory authorities is required to assure the public that all is being done at both the federal and state level to address this ever constant problem.

II. JURISDICTION

The federal Telecommunications Act of 1996 ("Act") grants the Federal Communications Commission ("FCC") exclusive jurisdiction over the North American Numbering Plan in the United States.¹ The FCC, however, has delegated specific authority to certain states to implement area code relief in the form voluntary thousands-block number pooling trials and central office code ("NXX") rationing in certain causes.² Recently, the FCC has granted additional authority to several states, including Florida, New York and California, to implement numbering conservation measures. These grants of additional authority provide states with new tools to address the depletion of telephone numbering resources. The TRA desires to act in cooperation with the FCC in addressing the issues arising from numbering conservation and rationing and concludes that, in the short-term, the states may be in the best position to act quickly in implementing numbering conservation strategies. The TRA affirms that, in being granted additional authority, it will comply with any guidelines or national rules established by

¹ 47 U.S.C. § 251(e)(1)

² Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area codes 412, 610, 215, and 717, *Memorandum Opinion and Order and Order on Reconsideration*, CC Docket No. 96-98, 13 FCC Rcd 19009, 19025, ¶¶ 23-31 (1998) (*Pennsylvania Numbering Order*).

the FCC and will act in close consultation with the telecommunications industry.

III. TRA'S CURRENT EFFORTS TO PROVIDE AREA CODE RELIEF

At the present time, state authority to deal with this significant issue is limited. The TRA has, nevertheless, taken the initiative in establishing an Area Code Task Force made up of representatives from both the wireline and wireless industries, along with representatives from the TRA.³ This Task Force is charged with exploring the current utilization of Tennessee's numbering resources and making recommendations to the TRA on strategies that will better conserve Tennessee's existing area codes. In addition, this Task Force will provide information on how efficiently telephone numbers are being utilized in Tennessee.

The TRA has taken other action to further area code conservation measures in Tennessee. On October 15, 1999, the TRA issued a request to all affected telecommunications service providers to consider taking voluntary measures toward area code conservation.⁴ The TRA asked providers and cooperatives to review their inventories and voluntarily return non-utilized or otherwise dormant NXX codes to the NANP.

Notwithstanding the foregoing actions, the TRA needs additional tools to address Tennessee's numbering resource problems at this point in time when number conservation efforts can have a dramatic impact. While it may be too late to significantly alter the life expectancy of the 615 area code, quick action could prolong the life expectancy of the 901, 423, 865 and the 931 area codes.

³ The TRA commissioned the Tennessee Telecommunications Association to form the Area Code Task Force on February 2, 1999, for the purpose of researching and exploring options and measures that may be taken for numbering resource conservation. To date the TRA has not received a report from the Task Force.

⁴ A copy of the TRA's *Request To All Affected Telecommunications Service Providers And Cooperatives In Tennessee To Take Voluntary Area Code Conservation Measures* is provided as Attachment A.

The TRA will evaluate all numbering conservation measures authorized by the FCC in light of their impact on competition in Tennessee and will take caution to implement only those numbering conservation measures that will have competitively neutral effects. In addition, the TRA, in exercising its delegated authority, will ensure that: (1) numbers are made available on an equitable basis; (2) numbering resources are made available on an efficient and timely basis; (3) whatever policies the TRA institutes with regard to numbering administration will not unduly favor or disfavor any particular telecommunications industry segment or group of telecommunications consumers; and (4) the TRA will not unduly favor one telecommunications technology over another.⁵

IV. AUTHORITY REQUESTED

The TRA requests that the FCC grant it authority to implement all or a portion of the variety of number conservation measures enumerated below. The TRA believes that these measures can conserve numbers without producing anti-competitive consequences and without favoring one type of provider or technology over another. Much of the additional authority sought by the TRA involves strict enforcement of existing industry guidelines. The TRA is involved in the efforts to develop national number conservation guidelines and is mindful of the fact that as national guidelines are developed Tennessee measures may require modifications.

The number conservation methods which the TRA requests authority to implement are detailed as follows:

⁵ These guidelines are in accordance with the FCC's stated guidelines for relief as articulated in *In the Matter of New York State Department of Public Service Petition for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket No. 96-98, FCC 99-247, ¶ 7 (1999).

A. Authority to enforce current numbering allocation standards and to establish and enforce new standards

The code administrator, Lockheed Martin, has limited authority to enforce standards for the allocation of NXXs. The TRA requests authority to enforce the existing standards such as requiring a requesting company to be certified to provide service in the area before assignment of NXXs. Further, the TRA could require that a forecasted need for a new NXX be demonstrated in a months-to-exhaust report. The TRA also seeks authority to establish and enforce additional standards, such as requiring that a requesting company meet a fill rate before a growth NXX can be granted. Likewise a requesting company could be required to demonstrate readiness to provide service before an initial NXX would be granted. With this additional authority the TRA could mandate that initial and growth NXXs be returned to the code or pooling administrator if such standards are not met.

B. Authority to maximize the efficiency of number use practices within NXX codes

The TRA requests the authority to order that sequential numbers be used within an NXX or thousand-block. Such authority would help to preserve blocks of numbers for eventual pooling, whether under a Tennessee pooling plan or a national pooling plan.

C. Authority to order number utilization and forecast reporting, and to audit such reporting

The TRA requests authority to require number utilization and forecast reporting by all providers so that the TRA can monitor usage and enforce numbering standards.⁶ Such reporting would permit the TRA to have an accurate analysis of the need projections and would create a database for use in developing and evaluating needs-based number assignment standards. At the

⁶ The TRA already has broad authority under state law (Tenn. Code Ann. § 65-4-104) to request information from public utilities. The requested delegated authority would enhance that authority.

present time, requesting companies are not required to provide number utilization data with their applications for additional central office codes. The TRA seeks authority to require a requesting company to submit a utilization survey in connection with its request for additional numbering resources. This data would also help the TRA determine whether providers are using existing numbering resources efficiently before additional resources are assigned. The TRA also requests the authority to audit or oversee the audit of forecast reports to monitor compliance with number assignment and utilization requirements.

D. Authority to reclaim unused and reserved NXX codes and portions of those codes

At a minimum a requesting company should be required to maximize the use of an NXX before another NXX is assigned. The TRA requests authority to require that in order for a company to retain a newly obtained NXX, it must not only be "activated" within six months, but also a certain percentage of numbers must actually have been assigned to end users within that period of time. The TRA desires authority to require carriers to return NXX codes and thousand-blocks if not needed or used within a specified period after assignment. Further, the TRA seeks authority to investigate and order the return of reserved and protected NXX codes if such becomes necessary and can be done without causing disruption to network operations.

E. Authority to implement mandatory thousands-block number pooling

In granting relief to the states the FCC has authorized the use of voluntary pooling trials, and has specifically authorized states to institute thousands-block pooling trials. The TRA seeks the authority to implement non-discriminatory mandatory thousands-block number pooling. The TRA views thousands-block number pooling as a desirable tool to achieve long-term number conservation. The TRA intends to work with the industry Task Force to implement pooling as quickly as possible. Through working with the industry the TRA will begin the development of

a number pooling plan in Tennessee. The FCC has recognized "that state number pooling trails could aid in developing national pooling implementation, architecture, and administrative standards."⁷

V. CONCLUSION

The currently existing mechanisms available to the states for addressing numbering allocation problems are proving to be inadequate. The TRA respectfully requests that the FCC grant this Petition for Additional Delegated Authority to permit it to implement number conservation measures to ensure more efficient number resource utilization and curtail the ordeal and expense of repeated area code relief measures.

Respectfully submitted,


Richard Collier
General Counsel

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
(615) 741-3191 ext.170

DATED: November 16, 1999

⁷ *In the Matter of New York State Department of Public Service Petition for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket No. 96-98, FCC 99-247, ¶ 10 (1999).

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

October 15, 1999

IN RE:

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MEASURES IN TENNESSEE**

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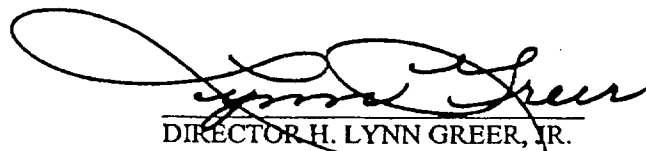
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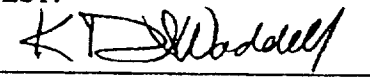
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CHAIRMAN MELVIN J. MALONE


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ATTEST:


Executive Secretary