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INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

In the Matter of the Petition of)
NeuStar, Inc., on Behalf of the Indiana) CAUSE NO. 44513
Telecommunications Industry, For Approval of)
NPA Relief Plan for the 317 NPA)

**VERIFIED PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE INDIANA TELECOMMUNICATIONS INDUSTRY FOR
RELIEF OF THE 317 NPA**

NeuStar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Indiana under the North American Numbering Plan and on behalf of the Indiana telecommunications industry (“Industry”),¹ by counsel, petitions the Indiana Utility Regulatory Commission (“Commission”)² to approve the Industry’s consensus decision³ to recommend to the Commission an all services distributed overlay (referred to as Alternative #1) of the 317 numbering plan area (“NPA”) as the preferred form of relief for the 317 NPA.⁴ The Industry submits its recommendations to the Commission based upon NANPA’s projections that absent NPA relief, the supply of central office codes (often referred to as “CO” or “NXX” codes) for the 317 NPA will exhaust during the second quarter of 2017.⁵

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 317 area code of Indiana.

² The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19.

³ Consensus as used in this document means: Consensus is established when substantial agreement has been reached among those participating in the issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement. Operating Procedures for ATIS Forums and Committees, §7.1 (ATIS Feb. 22, 2012).

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

⁵ 2014-1 NRUF and NPA Exhaust Analysis (April 2014) (“April 2014 NRUF Report”). The April 2014 NRUF Report can be accessed at <http://www.NANPA.com>.

In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 317 NPA and to fully implement customer education plans, the Industry recommends that the Commission approve the recommended 13-month implementation schedule if the Commission approves the overlay alternative. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

The April 2014 NRUF Report indicates that the 317 NPA is projected to exhaust during the second quarter of 2017. Due to the projected exhaust, NANPA notified the Industry on March 25, 2014 that NPA relief needed to be addressed.⁶ The Industry met via conference call on May 29, 2014 to discuss various relief alternatives.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting. The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of an all-services distributed overlay relief alternative and two concentrated overlay alternatives.⁸ The second concentrated overlay alternative (labeled Alternative #3 in the IPD) was proposed by an industry member.

⁶ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061, Mar. 14, 2014) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/inc/incguides.asp>.

⁷ A copy of the May 29 meeting minutes, including a list of attendees, is attached as Exhibit A.

⁸ A copy of the IPD is attached as Exhibit B. No geographic split alternatives were considered because a majority of the demand for NXX codes is in one rate center, the most balanced split would result in one NPA having a projected life of 24 years (the Indianapolis rate center) and the other NPA (the remainder of the rate centers in the 317 NPA, having a projected life of 104 years. The NPA Code Relief Planning Guidelines state that severe imbalances in lives (more than a 10 year difference) are to be avoided.

During the relief planning meeting, the Industry members evaluated the three relief alternatives, described more fully below:

- **Alternative #1 – All Services Distributed Overlay:** A new NPA code would be assigned to the same geographic area as the existing 317 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas. Alternative #1 has a projected life of 49 years.
- **Alternative #2 – Concentrated Overlay:** A concentrated overlay is a relief alternative in which a new NPA code would be assigned to only certain rate centers in the same geographic area occupied by the existing 317 NPA. All remaining 317 NXX codes would be assigned only to the area outside of the overlay. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas within the concentrated overlay. Those customers not located within the overlay would retain seven-digit dialing until the remaining 317 NXX codes were assigned. The overlay then would be extended to all rate centers in the 317 NPA. At exhaust of the 317 NPA all future code assignments will be made in the overlay area code. As specifically proposed for Alternative #2, the concentrated overlay would encompass only the Indianapolis rate center. The projected time before the need for expansion of the overlay is 6.3 years. The projected life of the area code, including after the concentrated overlay is expanded to cover the entire 317 NPA, is 49 years. It was assumed for the calculation of these lives that the concentrated overlay will be introduced in the next twenty-one months.

- *Alternative #3 – Concentrated Overlay:* The industry proposed boundary line for the concentrated overlay, like *Alternative #2*, includes the Indianapolis rate center but also includes the 10 immediately surrounding rate centers of Carmel, Fishers, Oaklandon, Cumberland, Acton, Greenwood, West Newton, Plainfield, Brownsburg, and Zionsville. The projected time before the need for expansion of the overlay is 18.4 years. The projected life of the area code, including after the concentrated overlay is expanded to cover the entire 317 NPA, is 49 years. It was assumed for the calculation of these lives that the concentrated overlay will be introduced in the next twenty-one months.

At the May 29, 2014 meeting, the participants discussed the attributes of the relief alternatives and discussed the pros and cons of each and reached consensus to eliminate all alternatives except for *Alternative #1*, the all-services overlay.⁹ The Industry reached consensus to eliminate *Alternatives #2* and *#3* because the alternatives offer a relatively short time delay before the expansion of the overlay is required. Implementing essentially two overlays will require two phases of customer education thereby increasing the opportunity for customer confusion and require two rounds of customer education notices. A concentrated overlay would require difficult and complicated translations for service providers who use one switch to service multiple rate centers. Also, a concentrated overlay discriminates against customers inside the overlay area because they have to immediately begin dialing 10 digits for local calls whereas customers outside the overlay can wait until the new overlay is expanded. Industry participants reached

⁹ A complete list of the Industry's pros and cons for each alternative is listed on pages 6-8 of Exhibit A.

consensus to recommend to the Commission for consideration Alternative #1, the all-services distributed overlay plan as the preferred method of relief for the 317 NPA.

II. DESCRIPTION OF THE RECOMMENDED RELIEF ALTERNATIVE

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 317 NPA. All existing customers would retain the 317 area code and would not have to change their telephone numbers. The projected life of the overlay is 49 years. Consistent with FCC regulations, customers will dial 10 digits for all local calls.¹⁰

The table below sets forth the Industry recommended dialing plan for Alternative #1:

Overlay Dialing Plan for Alternative # 1:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10-digits (0+NPA-NXX-XXXX)

* 1 + 10 digit dialing also permissible at each service provider's discretion.

Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementation of the overlay. The recommended schedule is as follows:

Implementation Schedule for Alternative # 1 – Overlay

EVENT	TIMEFRAME
Total Implementation Interval	13 months
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 317 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period. <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)

¹⁰ 47 C.F.R. §52.19(c)(3)(ii).

The Industry requests that the Commission approve this timeline in order to ensure the timely implementation of relief and to facilitate customer education.

III. SERVICE OF PLEADINGS

The name, address, and telephone number of the attorney for NeuStar, Inc. is:

Anne E. Becker
Lewis & Kappes, P.C.
One American Square, Ste. 2500
Indianapolis, IN 46282
Phone: (317) 639-1210 / Fax: (317) 639-4882
Email: abecker@lewis-kappes.com

Additionally, NeuStar respectfully requests that the following also be served with all pleadings in this Cause:

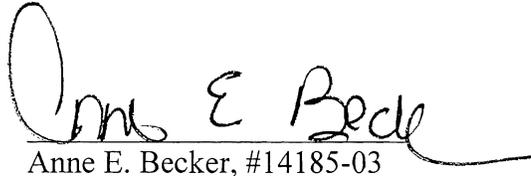
Kimberly Wheeler Miller
Assistant General Counsel
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Washington, D.C. 20006
Phone: (202) 533-2912 / Fax: (202) 533-2972
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Wayne Milby
Senior NPA Relief Planner
North American Numbering Plan Administrator
NeuStar, Inc.
8385 Yahley Mill Road
Richmond, VA 23231
Phone: (804) 795-5919

IV. CONCLUSION

The Industry respectfully requests that the Commission issue an order approving the Industry's recommended method and schedule for relief for the 317 NPA.

Respectfully submitted,

A handwritten signature in black ink that reads "Anne E. Becker". The signature is written in a cursive style with a large initial "A" and a long horizontal flourish extending to the right.

Anne E. Becker, #14185-03

Lewis & Kappes, P.C.

One American Square, Ste. 2500

Indianapolis, IN 46282

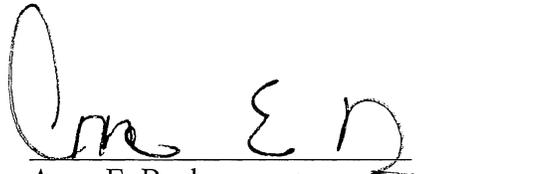
Phone: (317) 639-1210 / Fax: (317) 639-4882

Email: abecker@lewis-kappes.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing document have been served upon the following via electronic mail, this 10th day of July 2014:

David Stippler
Karol Krohn
OFFICE OF THE UTILITY CONSUMER COUNSELOR
Indiana Government Center North
100 North Senate Avenue, Room N501
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Anne E. Becker

VERIFICATION

I, John C. Manning, as Senior Director of the North American Numbering Plan Administrator of Neustar, Inc., affirm under penalties of perjury that the foregoing **Petition of the North American Numbering Plan Administrator on Behalf of the Indiana Telecommunications Industry for Relief of the 317 NPA** is true to the best of my knowledge, information and belief.

Signed this 10th day of July, 2014:

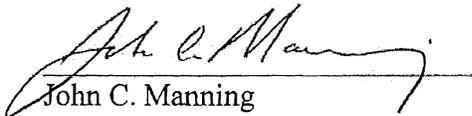

John C. Manning

EXHIBIT A

**INDIANA – 317 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
FINAL MINUTES
May 29, 2014**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Wayne Milby, Senior NPA Relief Planner – NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment 1. Wayne mentioned there would be a quality survey sent via email to those attending today's call. Wayne then reviewed the agenda and NANPA's role and responsibilities.

NANPA's ROLE AND RESPONSIBILITIES

Wayne reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA. (The April 2014 NRUF projects the 317 NPA will exhaust 2Q2017.)
- Facilitate a Pre-IPD conference call with the industry six weeks prior to the NPA Relief Planning meeting.
- Distribute the Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting.
- Review the relief alternatives presented in the IPD
- Check to see if there are any additional relief alternatives from the participants
- Discuss the alternatives and list some pros and cons for each alternative
- Then, through a process of elimination of all but one alternative, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the Indiana Utility Regulatory Commission (IURC).
- Also determine any additional items to include in a filing with the IURC such as dialing plan and implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry reaches consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting or the date set by the Industry.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Wayne stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Wayne stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

Wayne referred the participants to the three relief planning meeting aids included in the IPD document: the Excerpts from the INC NPA Relief Planning Guidelines, the

collection of Pros and Cons of relief alternatives chart, and the Implementation Interval and Dialing Plan charts. These meeting aids will assist the participants in their decision making process and to make a recommendation for relief.

Wayne reviewed the most pertinent items from the Industry Numbering Committee (INC) NPA Code Relief and Planning and Notification Guidelines for this meeting as follows:

- The NPA Relief Planning, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: (www.atis.org/inc/incguides.asp).
- The most pertinent items in the guidelines concerning this meeting are the relief options/alternatives shall cover a period of five years beyond the forecasted exhaust of the existing area code.
- If there is a split, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.
- The guidelines also state for split alternatives, that a difference in NPA lifetimes of more than 10 years shall be avoided.

STATUS OF INDIANA 317 NPA

Beth Sprague, Regional Director – NANPA CO Code Administration, reviewed the status of the 317 NPA, which reflects a total of 725 NXX codes currently assigned. As of May 29, 2014, 56 NXX codes remain available for assignment in the 317 NPA, while 19 additional NXX codes are classified as unavailable (See Attachment 2). Also the April 2014 Number Resource Utilization Forecast (NRUF) projects exhaust of the 317 NPA during the second quarter 2017.

The annual NXX code assignment history in the 317 NPA has been as follows:

2010 assignments: 20 codes
2011 assignments: 4 codes
2012 assignments: 16 codes
2013 assignments: 17 codes
2014 assignments year to date: 6 codes

STATUS OF ONE-THOUSAND-BLOCK POOLING IN 317 NPA

Cecilia McCabe, NeuStar Number Pooling Implementation Manager, stated number pooling started in the 317 NPA on December 1, 2001. Out of the 36 rate centers, there are 36 rate centers that are mandatory pooling, 0 mandatory-single service provider rate centers, 0 rate centers that are optional pooling and 0 rate centers are excluded from pooling. There have been 308 blocks assigned in the last 12 months and 210 blocks are available as of May 28, 2014. Pooling has assigned 18 codes in the last twelve months; 16 for pool replenishment, 0 for dedicated customers and 2 for LRNs. The forecasted need for codes for the next twelve months is 17 codes for pool replenishment and dedicated customers and 0 for LRNs. (See Attachment 3).

PRE-IPD CONFERENCE CALL RE-CAP

Wayne provided a recap of the pre-IPD conference call held April 24, 2014. The purpose of this pre-IPD call was to solicit industry input on the proposed relief plans and to discuss additional alternative relief plans for consideration prior to the issue of the IPD. No additional relief alternatives were suggested during the meeting. Informal meeting notes resulting from the pre-IPD industry conference were posted to NANPA's NAS-NNS service on April 29, 2014. Wayne noted the main purpose of that call was to obtain additional relief alternatives for consideration and he stated the industry will still have the opportunity to propose additional relief alternatives during the call today.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 317 NPA

Wayne reviewed the Initial Planning Document (IPD) distributed prior to the meeting. He noted an additional concentrated overlay alternative proposed by an industry member had been added to the IPD along with the corresponding map. This alternative #3 was included in the reminder notice of today's meeting that was distributed on May 21, 2014.

General Facts - Indiana:

The population of Indiana was 6,483,797 in 2010 compared to a population estimate of 6,570,901 in 2013, an increase of 1.34%. Indiana encompasses an area of 36,418 square miles and is bordered by Ohio and Kentucky on the east. On the west Illinois shares its border with Indiana. To the north of Indiana is Michigan and Lake Michigan. Indiana is bordered by Kentucky in the south. Much of the limestone used in the U.S. is quarried in Indiana. The USS Indianapolis was sunk in 1945 and of the 1,197 crewman, only 317 survived. In 1947, the 3-digit code 317 was assigned to the area that included Indianapolis. The state flower is the Peony and the state bird is the Cardinal.

Indiana currently has 6 active NPAs soon to be 7 on October 6, 2014 with the addition of the 930 NPA overlay over the 812 NPA. The 317 NPA was created on 1/1/47 as one of the original NPAs assigned to Indiana. The 317 NPA covers the central area of Indiana.

Wayne then briefly reviewed Appendix E to the NPA Code Relief Planning Guidelines which provides the General Attributes of Common Relief Alternatives.

The following maps and related documents were then reviewed:

Map showing location of all NPAs in Indiana

NPA 317 County Map

NPA 317 table of the population of each County in the 317 NPA with the percentage change in population from 2010 to 2012

NPA 317 Rate Centers & Cities with a Population > 5 K Map with Indianapolis incorporated city boundary highlighted in maroon color

NPA 317 Rate Centers & Cities with a Population > 5 K Map

NPA 317 Rate Center, County & Highway Map

NPA 317 Rate Center Map

NPA 317 Rate Center & County Map of the 36 rate centers
NPA 317 Rate Center & LATA Map
Rate Center Table
Code Holder Table

Wayne stated that with the additional alternative suggested by an industry member, the IPD now includes an all services distributed overlay (Alternative #1) and two concentrated overlays (Alternatives #2 and #3) He reviewed them as follows:

OVERLAY ALTERNATIVE

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 317 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 317 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 718
Total rate centers = 36
Area Code Life in Years = 49

CONCENTRATED OVERLAY ALTERNATIVES
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A new NPA code would be assigned to only certain rate centers in the same geographic area occupied by the existing 317 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. Those customers in the non-overlaid area of the 317 NPA would retain seven-digit dialing until the remaining 317 NXX codes were assigned and the overlay would then be extended to all rate centers in the 317 NPA. All remaining 317 NXX codes would be assigned only to the non-overlaid area. At exhaust of the 317 all future code assignments will be made in the overlay area code.

ALTERNATIVE #2 – CONCENTRATED OVERLAY

This would be a concentrated-overlay distributed across only the Indianapolis rate center in Area A. It was assumed for the calculation of these lives that the concentrated overlay

will be introduced in the next twenty-one months.

Total CO Codes = 483
Total rate centers = 1
Years before Expansion of Overlay: 6.3
Area Code Life in Years = 49

ALTERNATIVE #3 – CONCENTRATED OVERLAY

This alternative proposed by an industry member is the same as alternative #2 with the concentrated overlay distributed across the Indianapolis rate center, but also includes all of the adjacent rate centers that surround the Indianapolis rate center as follows: Carmel, Fishers, Oaklandon, Cumberland, Action, Greenwood, West Newton, Plainfield, Brownsburg and Zionsville in Area A. It was assumed for the calculation of these lives that the concentrated overlay will be introduced in the next twenty-one months.

Total CO Codes = 618
Total rate centers = 11
Years before Expansion of Overlay: 18.4
Area Code Life in Years = 49

INDUSTRY RECOMMENDED ALTERNATIVES
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Wayne asked the industry participants if there were additional suggestions for relief alternatives. There were no additional alternatives proposed during the relief planning meeting.

Wayne Noted: According to the NPA Code Relief Planning and Notification Guidelines, severe imbalances of more than 10 years are to be avoided. The only possible NPA split with Area A including only the Indianapolis rate center would result in lives of Area A = 24 years, Area B = 104 years.

DISCUSSION OF PROS AND CONS OF RELIEF ALTERNATIVES

A general discussion ensued regarding the Pros and Cons of each relief alternative and the industry agreed to the following:

Overlay Pros and Cons:

Pros:

Alternative # 1					
				1	
			X	1	All existing customers would retain the 317 area code and would not have to change their telephone numbers.
			X	2	Does not discriminate against customers on different sides of a boundary line as does a geographic split
				3	Easier education process
			X	4	Less customer confusion and easier education process
				5	Less financial impact to business customers because there is no need to change signage, advertising and stationery
			X	6	Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
			X	7	Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
				8	Customers do not have to update personal printed material such as checks and websites, etc.
			X	9	Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth
			X	10	No need for synchronization of old and new NPAs in NPAC databases
			X	11	Minimizes call routing issues, especially with ported numbers
			X	12	Easier for service providers to implement from a translations, billing and service order system perspective
			X	13	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
			X	14	The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
			X	15	Does not split cities or counties into different area codes.
			X	16	Keeps communities of interest intact.
			X	17	No impact on some wireless carriers that have to reprogram handsets manually
			X	18	No technical impacts to number portability, text messaging or multimedia messaging
			X	19	An all services overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice.
			X	20	An all services overlay would have a consistent local dialing pattern, as opposed to a concentrated overlay that could have two different types of local dialing in the 317 NPA.
			X	21	Helps move customers toward universal 10-digit dialing, recognizing the inevitable move of technology towards an internet protocol network, which requires 10-digit dialing.

Overlay Pros and Cons:

Cons:

Alternative #1					
				1	
			X	1	Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 317 NPA and the new NPA.
				2	Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
			X	3	Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
			X	4	Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
				5	Loss of geographic identity with an overlay.
				6	Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

Concentrated Overlay Pros and Cons:

Pros:

Alternative #					
		3	2		
				1	Does not impact as many customers at once
		X	X	2	Only area of greatest code usage is overlaid (initial impact)

Concentrated Overlay Pros and Cons:

Cons:

Alternative #					
		3	2		
				1	Splits host-remote arrangements for _____ Telco.
		X	X	2	Very short life before expansion is required
				3	A number of EAS routes cross this boundary
		X	X	4	Will require two customer education notices, the second when the overlay is expanded to cover entire area code; two full relief efforts.
		X	X	5	Customer confusion and education problems since it will have to be expanded in _____ years.
		X	X	6	Service providers that use one switch for multiple NPAs: a conc. Overlay is difficult to implement with complicated translations
				7	Concentrated overlay boundary splits time zone

		X	X		8	Would have to start implementation immediately and come back in a short amount of time to expand the overlay
		X	X		9	Discriminates against customers inside the overlay area that have to dial 10-digits immediately vs. those that get to keep 7-digit dialing outside of the concentrated overlay.
		X	X		10	Requires judgment in projecting exhaust of specific rate centers that may be false over time.

CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES

After discussion and review of the above listed Pros and Cons, proposals were made and consensus reached to eliminate the following Alternatives:

A proposal was made and consensus was reached to eliminate Alternative # 2 and 3 due to cons listed above.

CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION

After further discussion, a proposal was made and consensus was reached to recommend Alternative #1, the all services distributed overlay alternative, to the Indiana Utility Regulatory Commission as the industry’s preferred method of relief for the 317 NPA.

CONSENSUS ON DIALING PLAN (ALTERNATIVE #1)

Consensus was reached to recommend the following dialing plan for Alternative #1:

OVERLAY DIALING PLAN FOR ALTERNATIVE #1

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit also permissible at each service provider’s discretion

CONSENSUS ON IMPLEMENTATION INTERVALS

A recommendation was made and consensus reached to recommend to the Commission a 13-month schedule for implementation of the overlay.

The recommended schedule is as follows:

OVERLAY IMPLEMENTATION SCHEDULE FOR ALTERNATIVE #1

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 317 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

STATEMENTS FOR THE RECORD

No statements for the record were submitted.

NANPA FILING INDUSTRY EFFORTS WITH IURC

Consensus was reached that NANPA will prepare a draft of the petition that will be filed with the Indiana Utility Regulatory Commission (“IURC”) informing them of the outcome of this relief meeting. The draft filing will be reviewed by the industry on the conference call that will be held to approve these minutes. The INC guidelines reflect the relief petition is to be filed with the regulator within 6 weeks of the initial relief planning meeting unless otherwise agreed. The industry decided to review the status of the NPA during the call to review and approve these draft minutes before it decides when to file the relief petition.

REVIEW OF DRAFT MEETING MINUTES & IURC FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by June 12, 2014 and the draft commission filing distributed to the industry by June 19, 2014. Consensus was also reached to conduct a conference call on June 25, 2014 to review and approve the draft minutes and draft filing to the IURC.

During the call to approve the draft minutes, consensus was reached to file the petition with the IURC no later than July 10, 2014 unless additional steps are required by the IURC for NANPA to file the petition.

Details of the call are as follows:

Date: June 25, 2014

Time: 11:00 AM ET; 10:00 AM CT; 9:00 AM MT; 8:00 AM PT

Dial-in number: 630-827-6799

Pass code: 8831535#

Click on the Link Below or cut and paste the link to add this meeting to your calendar program (for example Microsoft Outlook). When the meeting information is displayed, then click on “Add to My Calendar”. When you are ready to join the meeting, use the same link: Go to <https://neustar.webex.com/neustar/j.php?MTID=m22992a86a7085fa6f75ac9e9a12bacba>

If requested, enter your name and email address. If a password is required, enter the meeting password: 317

Adjourned

**INDIANA – 317 NPA
RELIEF PLANNING MEETING
Meeting Attendees
May 29, 2014**

PARTICIPANTS

NAME	COMPANY
George Guerra	AT&T
Javier Rodriguez	AT&T
Carol Everett	AT&T
Allyson Blevins	Bright House
Matthew Nolan	Bright House
Christy Permenter	Bright House
Alan Matsumoto	CenturyLink
Rita Schmitz	CenturyLink
Ellen Washbon	Frontier
Brent Cummings	INdigital telecom
Karol Krohn	IOUCC
Sally Getz	IURC
Kevin Sosbe	IURC
Joe Cocks	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA
Cecilia McCabe	Neustar Pooling Implementation
Becky Jefferson	MetroPCS
Shaunna Forshee	Sprint
Karen Riepenkroger	Sprint
Troy Guichard	T-Mobile
Paul Nejedlo	TDS Telecom
Maria Gonzales	tw telecom
Jena Downs	Verizon
Yun Lee	Verizon Business
Dana Crandall	Verizon Wireless
Nicole Winters	Windstream

Indiana

NPA 317 NXX Summary

Data as of May 29, 2014

<u>NPA</u>	<u>317</u>					
Assigned NXXs	725					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	19	See Note				
Available NXXs	56					
Total	800					
<u>Codes Assigned NPA 317</u>	<u>Jan-10</u>	<u>Feb-10</u>	<u>Mar-10</u>	<u>Apr-10</u>	<u>May-10</u>	<u>Jun-10</u>
	0	0	2	1	0	2
	<u>Jul-10</u>	<u>Aug-10</u>	<u>Sep-10</u>	<u>Oct-10</u>	<u>Nov-10</u>	<u>Dec-10</u>
	5	0	2	1	4	3
	<u>Jan-11</u>	<u>Feb-11</u>	<u>Mar-11</u>	<u>Apr-11</u>	<u>May-11</u>	<u>Jun-11</u>
	0	0	0	0	1	1
	<u>Jul-11</u>	<u>Aug-11</u>	<u>Sep-11</u>	<u>Oct-11</u>	<u>Nov-11</u>	<u>Dec-11</u>
	1	0	0	0	1	0
	<u>Jan-12</u>	<u>Feb-12</u>	<u>Mar-12</u>	<u>Apr-12</u>	<u>May-12</u>	<u>Jun-12</u>
	5	0	0	0	1	0
	<u>Jul-12</u>	<u>Aug-12</u>	<u>Sep-12</u>	<u>Oct-12</u>	<u>Nov-12</u>	<u>Dec-12</u>
	0	1	2	6	1	0
	<u>Jan-13</u>	<u>Feb-13</u>	<u>Mar-13</u>	<u>Apr-13</u>	<u>May-13</u>	<u>Jun-13</u>
	1	1	0	3	1	3
	<u>Jul-13</u>	<u>Aug-13</u>	<u>Sep-13</u>	<u>Oct-13</u>	<u>Nov-13</u>	<u>Dec-13</u>
	1	1	3	3	0	0
	<u>Jan-14</u>	<u>Feb-14</u>	<u>Mar-14</u>	<u>Apr-14</u>	<u>May-14</u>	
	1	1	3	0	1*	
*As of May 29, 2014						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

POOLING STATISTICS	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	IN 317
MEETING DATE:	5/29/2014
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	12/1/2001
RATE CENTERS	
<i># Total</i>	36
<i># Mandatory</i>	36
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	308
<i>(For time period 05/01/13 - 05/28/14)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	210
<i>(As of preparation date: 05/28/14)</i>	
CODES ASSIGNED	
<i># Total</i>	18
<i># for Pool Replenishment</i>	16
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	2
<i>(For time period 05/01/13 - 05/28/14)</i>	
CODES FORECASTED	
<i># Total</i>	17
<i># for Pool Replenishment and Dedicated Customers</i>	17
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 05/28/14)</i>	

EXHIBIT B

May 21, 2014

To: Indiana 317 Service Providers and Interested Industry Members

Re: Reminder Notice-Initial Planning Document to Plan Relief for the 317 NPA in Indiana

This is a reminder that on May 29, 2014 NANPA has scheduled an industry NPA relief planning conference call to develop recommended relief plans for the 317 NPA in Indiana.

The original April 30, 2014 Initial Planning Document (IPD) distribution follows with one exception. An industry member proposed an additional concentrated overlay alternative #3 that has been added to the attached IPD along with a corresponding map. The IPD contains the projected life of several possible relief alternatives. NANPA welcomes the submission of additional relief alternatives from interested parties. While additional relief alternatives will also be accepted during the May 29th meeting, advance submission is recommended to allow interested parties adequate time to review prior to the meeting.

Accordingly, on May 29, 2014 NANPA will convene an industry NPA relief planning conference call to develop a recommended relief plan for the 317 NPA. The objective of this meeting is to secure consensus among members of the Indiana Telecommunications Industry on a single plan for relief of the 317 NPA. The resulting relief plan will be filed with the Indiana Utility Regulatory Commission (IURC) for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (ATIS) will be applied in the decision-making efforts (See attached copy).

Attached to this notice are copies of the Indiana 317 NPA NXX Summary report and Pooling Statistics report for your review during the conference call.

Because the impacts of NPA relief planning are so significant, NANPA strongly encourages your participation at the May 29, 2014 meeting. Past experience demonstrates that this could be the only meeting of the Industry before a decision is reached on a recommended relief plan. The details of the May meeting are as follows:

Date: May 29, 2014

Time: 2:00 PM ET; 1:00 PM CT; 12:00 PM MT; 11:00 AM PT

Dial-in number: (630) 827-6799

Pass code: 8831535#

Click on the Link Below or cut and paste the link to add this meeting to your calendar program (for example Microsoft Outlook). When the meeting information is displayed, then click on "Add to My Calendar". When you are ready to join the meeting, use the same link:

Go to <https://neustar.webex.com/neustar/j.php?MTID=m695eeac05d4bc8479daac966a7b05919>

If requested, enter your name and email address. If a password is required, enter the meeting password: 317

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you received this notice from someone else, and would like to receive additional information in the future about the 317 relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you plan on attending the NPA Relief Planning conference call on May 29, 2014 please let me know by sending an email to wayne.milby@neustar.biz. This will help us to determine if all industry parties will be represented at the 317 NPA meeting.

Please feel free to contact me if you have any questions regarding the above relief planning conference call, any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on 804-795-5919 or via email at the address above.

Sincerely,

A handwritten signature in black ink that reads "D. Wayne Milby". The signature is written in a cursive, flowing style.

D. Wayne Milby
Senior NPA Relief Planner – NANPA
e-mail: wayne.milby@neustar.biz

CC: Pam Taber – IURC Staff
Sally Getz – IURC Staff
Karol Krohn – IOUCC
Ron Keen - IOUCC

Attachments

**INDIANA - NPA 317
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
Dial-In Number: 630-827-6799, Pass code 8831535#**

**MAY 29, 2014
2:00 PM – 4:30 PM (ET)**

AGENDA

- 2:00** **Welcome & Introductions**
NANPA's Role & Responsibilities
Minutes & Statements for the Record
Industry Guidelines/Relief Alternatives
Review Code Assignment History
Re-cap Pre-IPD Conference Call
Review Initial Planning Document
Additional Relief Alternatives
- 3:00** **Break**
- 3:15** **Identify Pros & Cons of Alternatives**
Elimination of Alternatives
Consensus on Recommended Relief Alternative
Consensus on Dialing Plan
Consensus on Implementation Intervals
Statements for the Record
Consensus on NANPA Filing Industry Efforts with
Indiana Utility Regulatory Commission - IURC
- Set Date for Conference Call to Review Meeting Notes**
and Draft Petition
- 4:30** **Adjourn**

INDUSTRY CONSENSUS PROCESS

2/22/2012

ATIS OPERATING PROCEDURES

VERSION 5.2

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures.

Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the committee and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

Indiana
NPA 317 NXX Summary
Data as of May 13, 2014

<u>NPA</u>	<u>317</u>					
Assigned NXXs	724					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	19	See Note				
Available NXXs	57					
Total	800					
<u>Codes Assigned NPA 317</u>	<u>Jan-10</u>	<u>Feb-10</u>	<u>Mar-10</u>	<u>Apr-10</u>	<u>May-10</u>	<u>Jun-10</u>
	0	0	2	1	0	2
	<u>Jul-10</u>	<u>Aug-10</u>	<u>Sep-10</u>	<u>Oct-10</u>	<u>Nov-10</u>	<u>Dec-10</u>
	5	0	2	1	4	3
	<u>Jan-11</u>	<u>Feb-11</u>	<u>Mar-11</u>	<u>Apr-11</u>	<u>May-11</u>	<u>Jun-11</u>
	0	0	0	0	1	1
	<u>Jul-11</u>	<u>Aug-11</u>	<u>Sep-11</u>	<u>Oct-11</u>	<u>Nov-11</u>	<u>Dec-11</u>
	1	0	0	0	1	0
	<u>Jan-12</u>	<u>Feb-12</u>	<u>Mar-12</u>	<u>Apr-12</u>	<u>May-12</u>	<u>Jun-12</u>
	5	0	0	0	1	0
	<u>Jul-12</u>	<u>Aug-12</u>	<u>Sep-12</u>	<u>Oct-12</u>	<u>Nov-12</u>	<u>Dec-12</u>
	0	1	2	6	1	0
	<u>Jan-13</u>	<u>Feb-13</u>	<u>Mar-13</u>	<u>Apr-13</u>	<u>May-13</u>	<u>Jun-13</u>
	1	1	0	3	1	3
	<u>Jul-13</u>	<u>Aug-13</u>	<u>Sep-13</u>	<u>Oct-13</u>	<u>Nov-13</u>	<u>Dec-13</u>
	1	1	3	3	0	0
	<u>Jan-14</u>	<u>Feb-14</u>	<u>Mar-14</u>	<u>Apr-14</u>	<u>May-14</u>	
	1	1	3	0	1*	
*As of May 13, 2014						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

POOLING STATISTICS*Provided By: Cecilia McCabe*

ST/NPA:	IN 317
MEETING DATE:	5/29/2014
MEETING SUBJECT:	
	<i>Relief Planning</i> X
	<i>Jeopardy</i>
	<i>Jeopardy Status Review</i>
	<i>UA NXXs</i>
	<i>Other</i>
POOL START DATE (PSD)	12/1/2001
RATE CENTERS	
	<i># Total</i> 36
	<i># Mandatory</i> 36
	<i># Mandatory-Single Service Providers (M*)</i> 0
	<i># Optional</i> 0
	<i># Excluded</i> 0
BLOCKS ASSIGNED	
	<i># Total</i> 285
	<i>(For time period 05/01/13 - 04/23/14)</i>
BLOCKS AVAILABLE	
	<i>#Total</i> 223
	<i>(As of preparation date: 04/23/14)</i>
CODES ASSIGNED	
	<i># Total</i> 17
	<i># for Pool Replenishment</i> 15
	<i># for Dedicated Customers</i> 0
	<i># for LRNs</i> 2
	<i>(For time period 05/01/13 - 04/23/14)</i>
CODES FORECASTED	
	<i># Total</i> 23
	<i># for Pool Replenishment and Dedicated Customers</i> 23
	<i># for LRNs</i> 0
	<i>(For the next twelve months as of: 04/23/14)</i>

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

This meeting aid is prepared to assist the participants in understanding basic steps and considerations in NPA Relief Planning and the criteria established to determine if relief alternatives are viable.

Section:

- 2.6 The ATIS consensus process will be employed in selecting an industry relief recommendation.

- 2.12 Once there is an approved relief plan, all code holders, block holders, and the Pooling Administrator (PA) in the exhausting NPA shall take the appropriate steps to facilitate the implementation of the plan.

Section:

5.0 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

Sub -A - The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.

Sub -E - For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

Sub -F - The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

Sub –G – The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e. two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the premise that all NXXs available for assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

Sub -H - In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

- 5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes (e.g. pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split,

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

the end of the recorded announcement period should be at least six months prior to the earliest likely exhaust date.

- 5.3 Define the Attributes of Each Alternative or Method - For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, local dialing plans using 7-digits or 10-digits. Examples of attributes are shown in Appendix E.
- 5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The IPD should be provided at least four weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.
- 5.5 Conduct Industry Meetings with the Goal of Reaching Industry Consensus on a Relief Plan – Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration³. NANPA will moderate these meetings or conference calls and will be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and must be

³ Caveat: those on the bridge may NOT ask for comments to be repeated or for additional explanations to be given because they cannot see what's happening in the room. The use of a bridge must not slow down the meeting.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

considered in these discussions. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

In discussing the alternatives, issues such as new NPA boundaries, local calling areas, protected codes, regulatory issues, customer education, 911 issues, and the length of any necessary permissive dialing period should be considered.

All meetings and/or conference calls should be fully documented in meeting minutes, which are to be made available to the local industry within two weeks after the meeting/conference call and no less than one week prior to a subsequent meeting or call unless otherwise agreed. Copies of meeting minutes may also be forwarded to the appropriate regulatory body.

- 5.6 Notify Appropriate Regulatory Body - When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory body (or bodies) the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.
- 5.6.1 Where NPA relief is required for an existing overlay complex, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

NANPA shall notify all affected parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft petition. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

- 5.6.2 Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all affected parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g. an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local⁴ and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

⁴ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

5.7 Approval by Appropriate Regulatory Body – When the regulator issues an order for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.

5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA
- and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating new NPA boundaries and new dialing procedures.

5.9 Industry NPA Relief Implementation Meeting - NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan. [NANPA, on its own initiative or using input from Service Providers, has the option to convene a face-to-face meeting if the chosen plan presents unusual implementation factors.] The meeting shall occur no more than 45 days following the assignment of a new NPA. The agenda for the industry implementation meeting should include relevant dates, milestones, customer education, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.

5.10 Planning Letter – NANPA shall post a Planning Letter to its website informing the public and the industry of pending NPA relief no more than three weeks after the initial implementation meeting. If regulatory approval of the implementation plan with interval dates is required, the Planning Letter will be published within 10 business days of

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 3/14/14

regulatory approval. If an additional implementation meeting is required, the Planning Letter will be published within 3 weeks of the additional implementation meeting.

This Planning Letter should include a full disclosure of the associated testing period, permissive dialing period, affected NXXs, rate centers, records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification, the date it will become available and the disconnect date. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, dialing procedures and a NANPA contact name and telephone number. Service providers that are code and/or block holders within the affected NPA should provide to the NANPA their company's NPA Relief Project Coordinator's contact information for inclusion in the company contact section of the Planning Letter.

Appendix B**Issues To Be Considered During NPA Relief Planning**

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- * quantity of subscribers who will have to undergo number changes
- * impact on customer premise equipment (CPE), e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- * public reaction to and political involvement in boundary decisions
- * impact on market identity/recognition, geographic identity, public familiarity
- * public costs such as stationery, business cards, advertising, CPE and database reprogramming.

Network and Service Providers

- * hardware and software upgrades to switching systems
- * modification to or replacement of some operations support systems
- * modification to operator services switches and/or systems
- * directory assistance impacts
- * 911 system impacts
- * directory changes
- * public notification/education requirements
- * changes to existing network routing and translations
- * impact of permissive dialing period
- * length of planning period
- * impact on dialing plan
- * experience with relief method/implementation procedure
- * interaction with appropriate regulatory bodies
- * tariff impacts
- * internal networks
- * LNP compliance impacts

Industry Concerns

- * length of relief period
- * NPA code utilization
- * Number Pooling impact on length of relief period (where applicable)

Relief Planning Meeting Aid

Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

This meeting aid is a compilation of industry developed Pros and Cons and is prepared to assist the participants in evaluating the attributes of the relief alternatives being considered.

Overlay Pros and Cons:

Pros:

Alternative #					
				1	
					1 All existing customers would retain the ___ area code and would not have to change their telephone numbers.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
					3 Easier education process
					4 Less customer confusion and easier education process
					5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
					6 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
					7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					8 Customers do not have to update personal printed material such as checks and websites, etc.
					9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand notwithstanding forecasts for growth
					10 No need for synchronization of old and new NPAs in NPAC databases
					11 Minimizes call routing issues, especially with ported numbers
					12 Easier for service providers to implement from a translations, billing and service order system perspective
					13 Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table
					14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
					15 Does not split cities or counties into different area codes.
					16 Keeps communities of interest in tact.
					17 No impact on some wireless carriers that have to reprogram handsets manually
					18 No technical impacts to number portability, text messaging or multimedia messaging

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Overlay Pros and Cons:

Cons:

Alternative #				
				1
				1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the ___ NPA and the new NPA.
				2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
				3 Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
				4 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
				5 Loss of geographic identity with an overlay.
				6 Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

NPA Split Pros and Cons

Pros:

Alternative #				
				1 Customers retain seven-digit dialing for all calls within the same NPA.
				2 Maintains seven digit dialing for local calls within the same NPA
				3 Approximately ½ of customers would experience no change if they keep the XXX NPA
				4 Projected lives are balanced
				5 The projected lives are slightly more balanced than alternative # .
				6 The projected lives are more balanced
				7 This alternative allows _____ to maintain operations on one side of the split line.
				8 _____ operating territory is kept in tact
				9 Retains the geographic identity with one area code.
				10 Keeps the cities on both sides of the split lines intact.

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NPA Split Pros and Cons:

Cons:

Alternative #	
	1 Splits _____ operating territory between two NPAs
	2 _____ EAS calling is heavily disrupted
	3 Projected lives are imbalanced, _ years difference, least balanced of the split alternatives, could become more imbalanced if demand changes in future years
	4 Requires approximately ½ of ___ NPA customers to change their telephone numbers thus creating winners and losers.
	5 Requires NPA change for approximately ½ of ___ NPA customers
	6 Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
	7 Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
	8 Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
	9 All ___ NPA customers previously went through a split _ years ago and half will have to change again
	10 Difficult PSC/PUC decision on which side retains the old NPA.
	11 Longer time period needed for service providers to implement this type of relief.
	12 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
	13 More complicated and costly to implement for service providers in their billing, translations and database systems.
	14 Splits affect alarm systems and E-911 databases.
	15 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
	16 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
	17 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
	18 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone

Industry Developed Pros and Cons for Relief Alternatives From Recent NPA Relief Planning Meetings

					numbers.
					19 Split requires significant challenges to service provider's operational support systems and network elements.
					20 Splits cause customer confusion with caller ID during implementation.
					21 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					22 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					23 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					24 This split disrupts the SP's host-remote switch arrangement.
					25 Splits require the 800/SMS database to be updated.
					26 Splits reduce the geographic area served by one area code.
					27 Splits the city(s), counties or legislative districts into different area codes.
					28 Splits communities of interest.
					29 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

Concentrated Overlay Pros and Cons:

Pros:

Alternative #				
		3	2	
				1 Does not impact as many customers at once
				2 Only area of greatest code usage is overlaid (initial impact)

Concentrated Overlay Pros and Cons:

Cons:

Alternative #				
		3	2	
				1 Splits host-remote arrangements for _____ Telco.
				2 Very short life before expansion is required
				3 A number of EAS routes cross this boundary
				4 Will require two customer education notices, the second when the overlay is expanded to cover entire area code; two full relief efforts.

Relief Planning Meeting Aid

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					5	Customer confusion and education problems since it will have to be expanded in _____ years.
					6	Service providers that use one switch for multiple NPAs: a conc. Overlay is difficult to implement with complicated translations
					7	Concentrated overlay boundary splits time zone
					8	Would have to start implementation immediately and come back in a short amount of time to expand the overlay
					9	Discriminates against customers inside the overlay area that have to dial 10-digits immediately vs. those that get to keep 7-digit dialing outside of the concentrated overlay.
					10	Requires judgment in projecting exhaust of specific rate centers that may be false over time.

Dialing Plans and Implementation Intervals

This meeting aid has examples of industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at each service provider's discretion

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within existing NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period <i>(Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation <i>(Effective date for codes from the new NPA)</i>	End of Recording Period
Total Implementation Interval	15 months

FINAL
INITIAL PLANNING DOCUMENT
FOR
RELIEF OF THE
INDIANA - 317 NPA

NORTH AMERICAN NUMBERING PLAN ADMINISTRATION

WAYNE MILBY
SENIOR NPA RELIEF PLANNER

May 21, 2014

317 NPA Background Information

General Facts:

The population of Indiana was 6,483,797 in 2010 compared to a population estimate of 6,570,901 in 2013. Indiana encompasses an area of 36,418 square miles and is bordered by Ohio and Kentucky on the east. On the west Illinois shares its border with Indiana. To the north of Indiana is Michigan and Lake Michigan. Indiana is bordered by Kentucky in the south. Much of the building limestone used in the U.S. is quarried in Indiana. The USS Indianapolis was sunk in 1945 and of the 1,197 crewman, only 317 survived. In 1947, the 3-digit code 317 was assigned to the area that included Indianapolis. The state flower is the Peony and the state bird is the Cardinal.

Indiana currently has 6 active NPAs soon to be 7 on October 6, 2014 with the addition of the 930 NPA overlay over the 812 NPA. The 317 NPA was created on 1/1/47 as one of one of the 3 original NPAs assigned to Indiana. The 317 NPA covers the central area of Indiana.

General Facts and Assumptions

The October 2013 NRUF NPA Exhaust Projection is 2Q2017 and reflects an annualized central office code growth of 16 NXX codes or 1.3 codes per month for the 317 NPA.

During 2014 the total code assignments through March 17th were 5 codes assigned.

- Assignment History: 2013 = 17; 2012 = 16; 2011 = 4; 2010 = 20; 2009 = 10

There are 45 code holders in the 317 NPA

The 317 NPA has 36 rate centers: 6 rate centers have one NXX code assigned, 5 rate centers have two NXX codes assigned and one rate center has 483 codes assigned (Indianapolis, Indiana).

Thousand-Block-Number Pooling started in December 2001. There are 36 rate centers that have mandatory pooling, 0 mandatory-single service provider rate centers, 0 rate centers that have optional pooling and 0 rate centers that are excluded from pooling.

As of March 17, 2014, the 317 NPA has 57 codes available and 19 unavailable codes.

The 317 NPA is in the 336 LATA.

Dialing Procedures for 317 NPA

Type of call	Call terminating to	Dialing plan
Local call	Home NPA (HNPA)	7-digits (NXX-XXXX)
	Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10-digits (0 + NPA-NXX-XXXX)

Appendix E

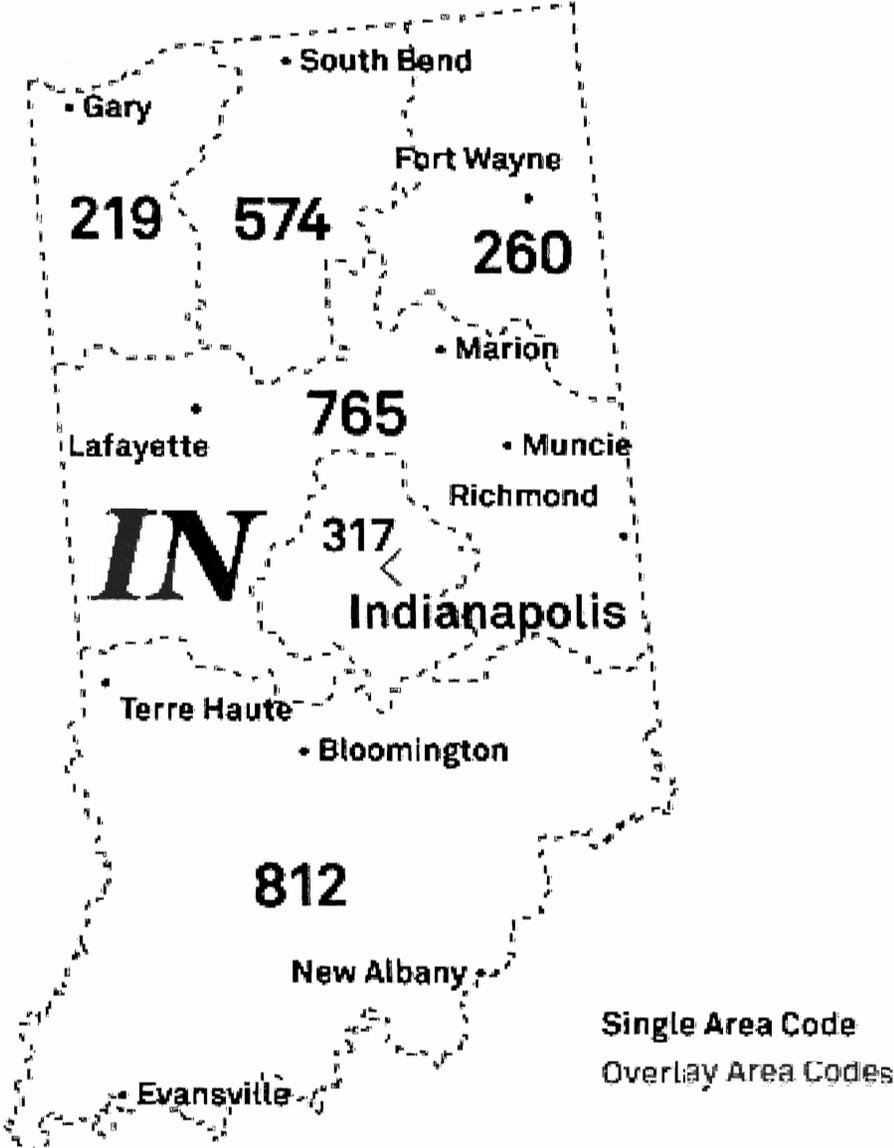
General Attributes of the Most Common Relief Alternatives

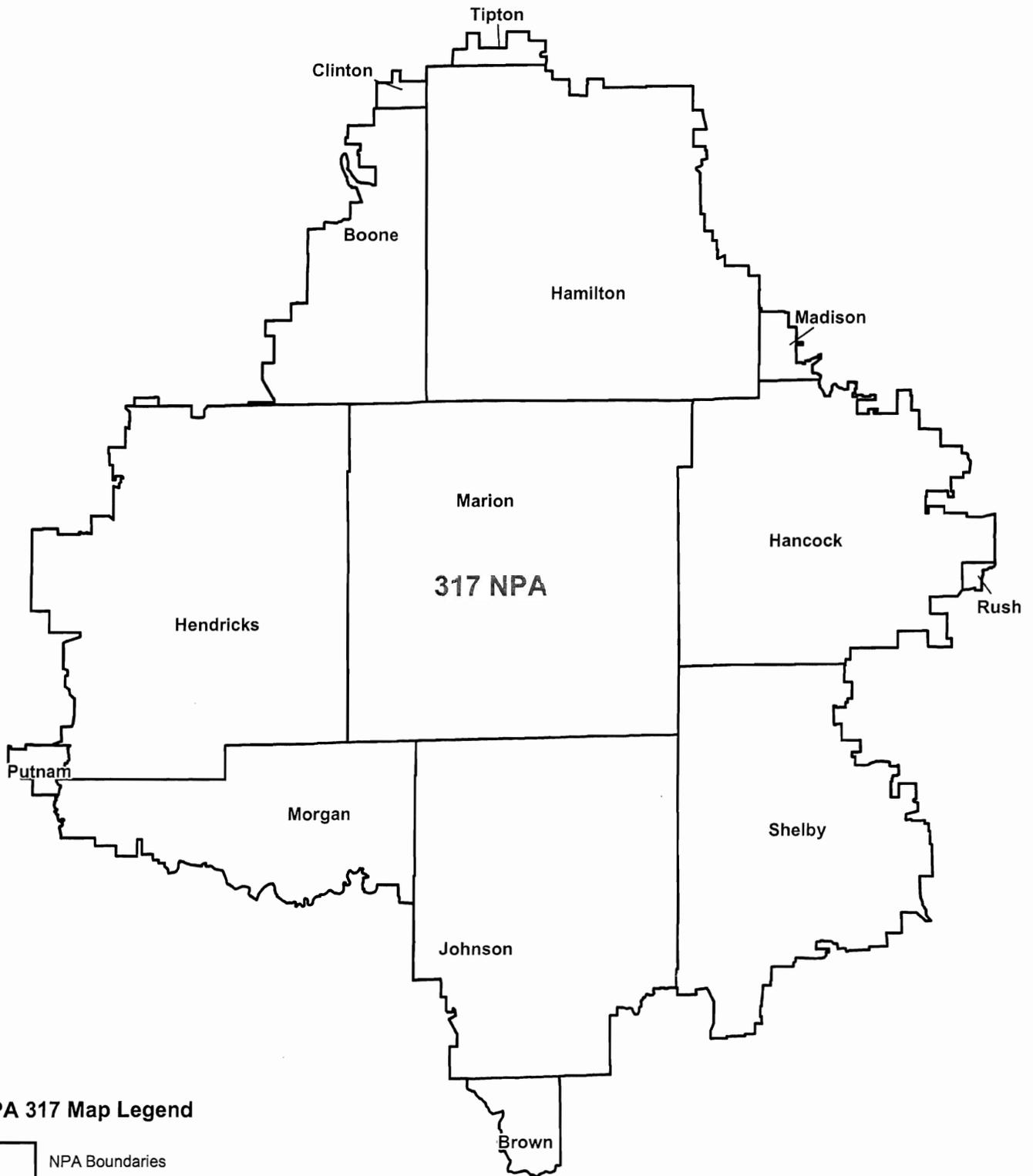
Geographic Splits	All-Services Overlays
<ul style="list-style-type: none"> Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area. 	<ul style="list-style-type: none"> With an overlay there will be more than one area code in a geographic area.
<ul style="list-style-type: none"> Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split. 	<ul style="list-style-type: none"> An overlay will not require existing customers to change their area code.
<ul style="list-style-type: none"> Geographic splits permit 7-digit dialing within an area code. 	<ul style="list-style-type: none"> An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
<ul style="list-style-type: none"> Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code. 	<ul style="list-style-type: none"> There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.
<ul style="list-style-type: none"> Future splits will reduce the geographic size of the area code. 	<ul style="list-style-type: none"> An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.



Area Codes Map

IN - Indiana





NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  County Boundaries

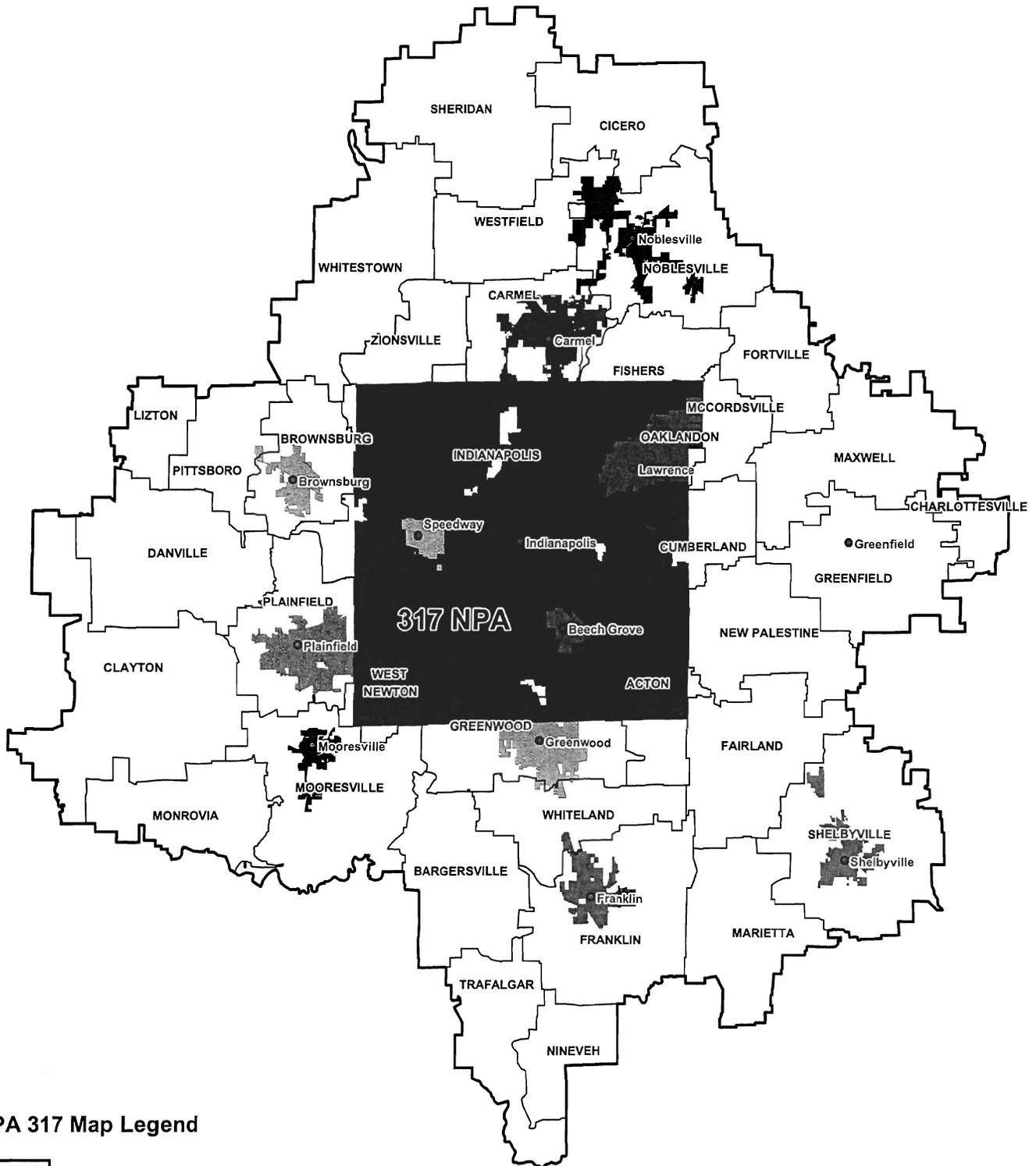
INDIANA 317

<u>COUNTY</u>	<u>POPULATION 2010</u>	<u>POPULATION, PERCENT CHANGE 2010 TO 2012</u>
BOONE	58,944	4.1%
BROWN*	15,083	-1.0%
CLINTON*	33,022	-0.6%
HAMILTON	274,569	5.4%
HANCOCK	70,933	1.3%
HENDRICKS	150,434	3.4%
JOHNSON	143,191	2.5%
MADISON*	130,348	-1.0%
MARION (INDIANAPOLIS)	918,977	1.7%
MORGAN	69,356	0.7%
PUTNAM*	37,750	-0.6%
RUSH*	17,095*	-1.7%
SHELBY	44,471	0.1%
TIPTON*	15,695	-1.5%
State of Indiana	6,483,802	0.8%

* Only a small portion of the county is in the 317 NPA

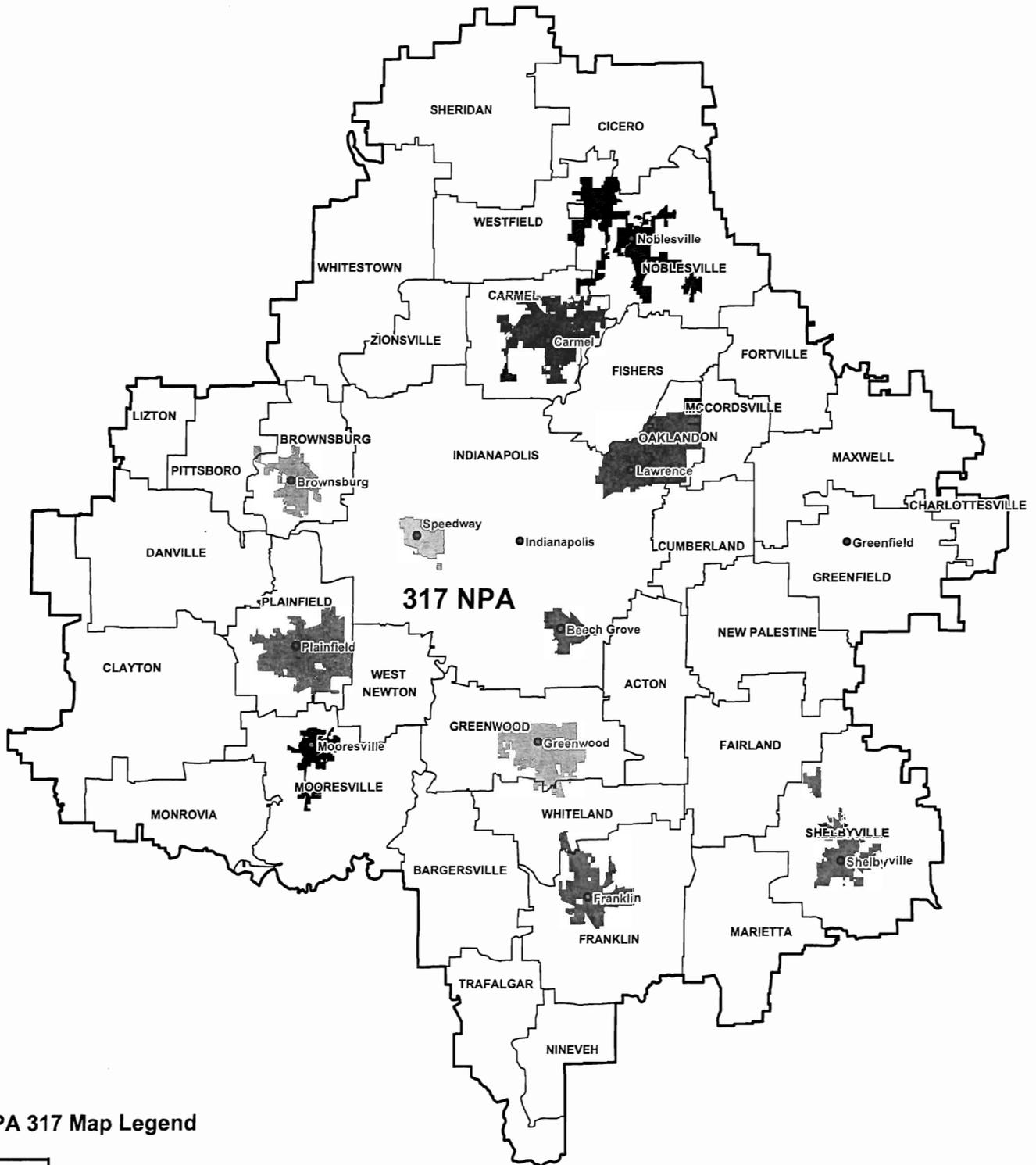
Indiana NPA 317 Rate Center & Cities > 5,000 Map

neustar



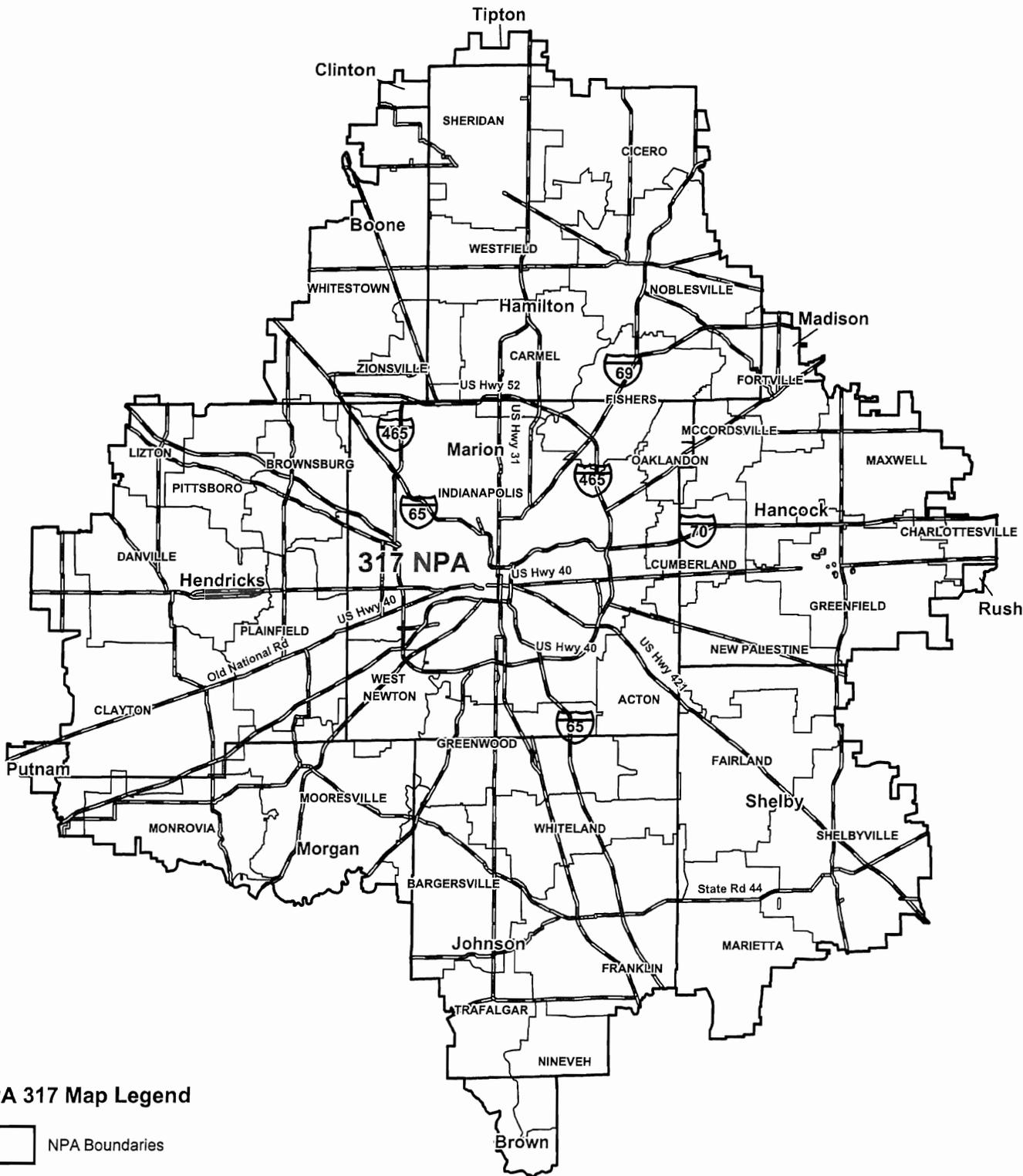
NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Cities > 5,000



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Cities > 5,000



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  County Boundaries
-  Highways



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  County Boundaries



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  LATA Boundaries

RATE CENTER TABLE

STATE: INDIANA

NPA: 317

RATE CENTER DATA DATE: January 27, 2014

Rate Center Name	Codes
ACTON	5
BARGERSVL	2
BROWNSBURG	6
CARMEL	38
CHARLOTSVL	2
CICERO	5
CLAYTON	1
CUMBERLAND	6
DANVILLE	5
FAIRLAND	5
FISHERS	31
FORTVILLE	3
FRANKLIN	9
GREENFIELD	11
GREENWOOD	19
INDIANAPLS	483
LIZTON	2
MARIETTA	1
MAXWELL	3
MCCORDSVL	3
MONROVIA	1
MOORESVL	5
NEWPALSTIN	3
NINEVEH	1
NOBLESVL	13
OAKLANDON	5
PITTSBORO	1
PLAINFIELD	13
SHELBYVL	11
SHERIDAN	3
TRAFALGAR	1
WESTFIELD	5
WESTNEWTON	6
WHITELAND	2
WHITESTOWN	2
ZIONSVILLE	6

CODE HOLDER TABLE

STATE: INDIANA

NPA: 317

OCN DATA DATE: January 27, 2014

OCN Name	OCN	Codes
US XCHANGE OF INDIANA LLC DBA CHOICE ONE COMM IN	8366	10
HRS INTERNET, LLC DBA LIGHTBOUND - IN	472C	4
BRIGHT HOUSE NTWS INFORMATION SVCS (INDIANA) - IN	338E	4
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - IN	6725	65
AMERICAN MESSAGING (AM), INC.	9748	13
COMCAST PHONE OF CENTRAL INDIANA, LLC - IN	930B	7
BANDWIDTH.COM CLEC, LLC - IN	105F	4
AERO COMMS DBA AERO SOUTH COMMUNICATIONS, LLC - IN	065E	1
INDIANA PAGING NTWK	6795	3
TW TELECOM OF INDIANA LP - IN	7060	20
HANCOCK COMMUNICATIONS, INC. - IN	7459	4
CSM WIRELESS, LLC	665D	2
CINERGY METRONET, INC. - IN	970C	1
LOCAL ACCESS LLC - IN	203H	1
COMMUNICATIONS CORP. OF INDIANA	0776	3
UNITED TEL. CO. OF INDIANA, INC. DBA CENTURYLINK	0832	10
E.COM TECHNOLOGIES, LLC - IN	5099	4
OMNIPOINT COMMUNICATIONS MIDWEST OPERATIONS LLC	2964	25
365 WIRELESS, LLC	551G	1
GLOBAL CROSSING LOCAL SERVICES, INC.-IN	2548	18
SMITHVILLE COMM., INC DBA SMITHVILLE TELEPHONE CO.	0818	1
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- IN	6158	10
LEE'S COMMUNICATIONS, LLC	3768	1
YMAX COMMUNICATIONS CORP. - IN	352E	1
METRO PCS, INC.	5562	2
USA MOBILITY WIRELESS, INC.	6630	26
WINDSTREAM NUVOX INDIANA, INC. - IN	3292	8
FRONTIER NORTH, INC. - IN	0772	5
HOME TELEPHONE CO. OF PITTSBORO	0777	1
WINDSTREAM NORLIGHT, INC. - IN	8934	2
NEUTRAL TANDEM-INDIANA, LLC - IN	097D	1
SBC INTERNET SERVICES, INC.	516C	5
PEERLESS NETWORK OF INDIANA, LLC - IN	279F	1
CLAY COUNTRY RURAL TEL COOP DBA ENDEAVOR COMM	0753	1
HANCOCK RURAL TELEPHONE CORP. DBA NINESTAR CONNECT	0775	4
CINCINNATI BELL ANY DISTANCE INC. - IN	3638	1
SPRINT SPECTRUM L.P.	6664	51
LEVEL 3 COMMUNICATIONS, LLC - IN	4803	10
NEW CINGULAR WIRELESS PCS, LLC - IL	6534	54

CODE HOLDER TABLE

AMERITECH INDIANA	9325	297
AT&T LOCAL	7421	5
MCI WORLDCOM COMMUNICATIONS, INC. - IN	7440	9
TELEPORT COMMUNICATIONS AMERICA, LLC - IN	7314	21
BROADVOX-CLEC, LLC - IN	910D	1
BIG RIVER TELEPHONE COMPANY, LLC - IN	501G	1

317 NPA - RELIEF ALTERNATIVES

INDIANA

Numbering Plan Area Born on Date: January 1, 1947

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE..... October 2013
PROJECTED EXHAUST DATE.....2Q2017
ANNUALIZED CODE DEMAND PROJECTION.....16
MONTHLY CO CODE DEMAND PROJECTION.....1.3
NXX Assignment Data.....January 1, 2014

NPA RELIEF ALTERNATIVE

OVERLAY ALTERNATIVE

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 317 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 317 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 718
Total rate centers = 36
Area Code Life in Years = 49

CONCENTRATED OVERLAY ALTERNATIVES

A new NPA code would be assigned to only certain rate centers in the same geographic area occupied by the existing 317 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. Those customers in the non-overlaid area of the 317 NPA would retain seven-digit dialing until the remaining 317 NXX codes were assigned and the overlay would then be extended to all rate centers in the 317 NPA. All remaining 317 NXX codes would be assigned only to the non-overlaid area. At exhaust of the 317 all future code assignments will be made in the overlay area code.

ALTERNATIVE #2 – CONCENTRATED OVERLAY

This would be a concentrated-overlay distributed across only the Indianapolis rate center in Area A. It was assumed for the calculation of these lives that the concentrated overlay will be introduced in the next twenty-one months.

Total CO Codes = 483
Total rate centers = 1
Years before Expansion of Overlay: 6.3
Area Code Life in Years = 49

ALTERNATIVE #3 – CONCENTRATED OVERLAY

This alternative proposed by an industry member is the same as alternative #2 with the concentrated overlay distributed across the Indianapolis rate center, but also includes all of the adjacent rate centers that surround the Indianapolis rate center as follows: Carmel, Fishers, Oaklandon, Cumberland, Action, Greenwood, West Newton, Plainfield, Brownsburg and Zionsville in Area A. It was assumed for the calculation of these lives that the concentrated overlay will be introduced in the next twenty-one months.

Total CO Codes = 618
Total rate centers = 11
Years before Expansion of Overlay: 18.4
Area Code Life in Years = 49

317 NPA - RELIEF ALTERNATIVES

INDIANA

PROJECTED LIVES OF RELIEF ALTERNATIVES

IN YEARS

Alternative	Area A	Area B	Overlay
#1	-	-	49
#2	-	6.3	49
#3		12.5	49

Note: According to the NPA Code Relief Planning and Notification Guidelines, severe imbalances of more than 10 years are to be avoided. The only possible NPA split with Area A including only the Indianapolis rate center would result in lives of Area A = 24 years, Area B = 104 years.

Alternative #1 All Services Overlay



NPA 317 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Alternative #1	Projected Life
Overlay	49 Years

Alternative #2 Concentrated Overlay



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

PROJECTED_EXHAUST
49 Years

6.3 Years before Overlay Expansion

Alternative #3 Concentrated Overlay



NPA 317 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

PROJECTED_EXHAUST
49 Years
18.4 Years before Overlay Expansion

