

ORIGINAL



0000091513

ORIGINAL RECEIVED

414
u-b ✓

Arizona Corporation Commission

DOCKETED

2001 JAN 31 A 3:31

TO: THE COMMISSION

FROM: Utilities Division

JAN 31 2001

AZ CORP COMMISSION
DOCUMENT CONTROL

DATE: January 31, 2001

DOCKETED BY	
-------------	--

RE: IN THE MATTER OF GENERIC INVESTIGATION ON INDUSTRY PETITION FOR APPROVAL OF AN NPA RELIEF PLAN FOR THE 520 NPA (DOCKET NO. T-00000F-99-0641)

Competition in the local telephone market, and the increasing demand for telephone numbers to provide second lines, fax machines, modems, wireless service and new enhanced services has resulted in a projected exhaust of the 520 area code in late-2001 (NANPA April 2000 analysis, updated October 6, 2000). The 520 area code was established in 1995 for all locations outside of the Phoenix metropolitan and suburban area when the first exhaust of the 602 area code occurred.

I. BACKGROUND AND PROCEDURAL HISTORY

A. State Proceedings

On November 8, 1999 the North American Plan Administrator ("NANPA") Lockheed Martin IMS (currently known as NeuStar, Inc. ["NeuStar"]) on behalf of the Arizona Telecommunications Industry ("Industry") filed a Petition for Approval of a NPA Relief Plan for the 520 Numbering Plan Area ("NPA"). In its petition, the Industry estimates that without NPA relief the supply of central office codes will exhaust in late 2001.

The Industry was unable to reach consensus¹ on a final relief plan and asked the Commission to approve one of two proposed relief plans for the 520 NPA. The two proposed Industry relief plans are: a geographic split with the Tucson/Nogales areas retaining the 520 NPA, or an all-services overlay for the entire geographic area encompassed by the 520 NPA.

On March 6, 2000, Commission Staff requested NANPA schedule a conference call with the Industry in an effort to arrive at an Industry consensus on a single relief plan. In response to this request, NANPA scheduled a conference call for April 19, 2000. Following a review of the two proposed relief plans, the Industry reached consensus on an overlay covering the entire

¹ "Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. ... Substantial agreement means more than a simple majority, but not necessarily unanimity.", INC97-0404-016, November 13, 2000.

geographic area presently served by the 520 area code as the Industry recommended relief plan for the 520 NPA.

On May 8, 2000, Commission Staff requested that NANPA update the plan that was filed with its Petition to reflect the subsequent activity by the Industry and the consensus recommendation that was arrived at. On June 1, 2000, NANPA filed an Addendum to its petition in the above-captioned proceeding to notify the Commission of the Industry's consensus decision to recommend an all-services overlay as the method of relief for the 520 NPA.

On June 10, 2000, the Tucson rate center was consolidated from seven rate centers to one expanded rate center in an effort to conserve NXXs. The local calling area for Tucson consumers was not changed by this consolidation.

On June 14, 2000, Commission Staff invited affected telecommunications service providers and other interested parties to submit written comments to the Commission on the Industry proposed overlay relief plan. Parties were requested to file written comments on or before June 30, 2000, and reply comments on or before July 14, 2000. Initial Comments were filed by AT&T Communications of the Mountain States, Inc. ("AT&T"), Cox Arizona Telecom, L.L.C. ("Cox"), Citizens Mohave Cellular ("Mohave Wireless"), WorldCom, Inc. ("WorldCom") and U S WEST Communications, Inc., n/k/a/ Qwest Corporation. Citizens Utilities Company ("Citizens") filed comments prior to Staff's request. Reply Comments were filed by Cox and WorldCom.

On November 10, 2000, NANPA responded to a Staff request to analyze an additional relief alternative. This alternative modified the Industry split alternative by removing the Miami, Globe and San Carlos rate areas in Gila County from the area that would retain the 520 NPA. In addition, the 520 NPA as represented in the Industry split alternative would be expanded to include the remaining rate areas in Pima County and all rate areas in Cochise County.

The Commission held a series of public input hearings around the State in an attempt to garner input on the public's preference with respect to the recommended all-services overlay as well as the proposed split option which had been considered by the Industry. During the months of October and November 2000, public input hearings were held in Kingman, Tucson, Flagstaff and Prescott.

B. Related Federal Proceedings

On December 23, 1999, the Arizona Corporation Commission ("Commission") petitioned the Federal Communications Commission ("FCC") for "Expedited Delegation of Authority to Implement Number Conservation Measures." The Commission requested additional authority to: (1) implement mandatory thousands-block number pooling; (2) ensure efficient number use practices such as fill rates or sequential number assignment; (3) establish interim mandatory number utilization data reporting and forecasting requirements; (4) establish auditing procedures and implement random audits; (5) require the return of unused NXX codes

(prefixes) by carriers to the code administrator; and (6) require the return of unused or underutilized portions of NXX codes to the Pooling Administrator when one is selected.

On May 1, 2000, the Commission filed with the FCC a supplement to its Petition for Delegated Authority pursuant to paragraph 170 of the FCC's Numbering Resource Optimization Order (CC Docket No. 99-200).

On July 20, 2000, the FCC addressed the Delegation of Authority petitions of Arizona and several other states (In the Matter of Numbering Resource Optimization, et al., Docket No. 99-200 et al., Order [rel. July 20, 2000]). The FCC conditionally granted Arizona the authority to conduct audits of carriers' use of numbering resources and the authority to institute thousands-block number pooling in the 480, 520, 602 and 623 NPAs. Other aspects of the Commission's Petition were not ruled upon because the FCC, in the Number Resource Optimization Order, had already addressed those specific numbering resource optimization measures.

II. RELIEF ALTERNATIVES

A. The "Geographic Split"

A "Geographic Split" involves splitting the affected area into two separate NPA codes. Under this relief method, the geographic significance of area codes is retained since it divides the original area code and geography into two separate area codes and geographies.

The customers in the old area code are least affected since they retain the same 10-digit telephone number. Subscribers in the second area code keep the last 7-digits of their existing telephone number but have a new area code.

Under the Geographic Split, 7-digit dialing for local calling would continue within each NPA; however, 10-digit dialing would be required between NPAs or area codes.

B. The "Overlay"

With the "Overlay" method of relief, the new NPA or area code would be "overlaid" on top of the existing 520 area code. This means that all existing customers would keep their current 10-digit telephone number with the 520 area code. As NXXs in the overlay code are assigned to carriers, most new customers and other new service requests would receive telephone numbers in the new NPA. This is what is commonly referred to as an "all services overlay".

Under existing FCC rules and regulations, implementation of an Overlay is subject to the following conditions:

- a. Mandatory 10-digit dialing for all local telephone calls in the future in the affected area regardless of whether the calls are within or between NPAs.

- b. Provision of at least one central office code from the existing NPA to all service providers who have been authorized to provide telecommunications services 90 days prior to the introduction of the new area code.

III. POSITION OF INTERESTED PARTIES AND AFFECTED CARRIERS

A. Affected Carriers

Of the affected carriers who have filed written comments, AT&T, Cox and WorldCom supported a geographic split. However AT&T stated that while its preference was a geographic split it would also support an overlay subject to certain conditions. Citizens, Mohave Wireless and Qwest supported an all-services overlay.

The positions taken by those commenters favoring an all-services overlay may be generally summarized by the following:

- a. Allows existing customers to keep their current ten-digit telephone number.
- b. Cellular customers are not required to have their handsets reprogrammed.
- c. Least cost for both customers and rural service providers.
- d. Future area codes can be added without customers having to make any more changes.
- e. Does not require customers who were required to take a number change in 1995 to be subject to another.

The positions taken by those commenters **not** in favor an all-services overlay may be generally summarized by the following:

- a. Requires the loss of all seven-digit local dialing.
- b. Lose ability to associate an area code with a unique geographic area.
- c. Consumer confusion may arise from different area codes being assigned in the same home, business or neighborhood.
- d. May not alleviate the cost to customers for such things as revisions to advertising, stationary or other material containing a seven-digit telephone number, reprogramming equipment with automatic dialers or revisions to PBX systems.

- e. Can negatively impact entry into the market place by competitive local exchange carriers.

Additional positions taken by those commenters favoring a geographic split may be generally summarized by the following:

- a. A split is competitively neutral with respect to telecommunications providers.
- b. Many consumer surveys indicate a customer preference for geographic splits versus all service overlays.
- c. Most widely accepted method of NPA relief.
- d. The very large geographic area is conducive to a split.
- e. Rural areas would not be required to implement mandatory ten-digit local dialing prior to urban areas.

Additional positions taken by those commenters **not** in favor of a geographic split may be generally summarized by the following:

- a. A geographic split is a less permanent solution.
- b. Future relief may be more readily accomplished through additional overlays.

Unlike wireline phones, wireless phones need to be physically reprogrammed to accommodate a change in area code. Grandfathering of wireless codes, in the event of a geographic split, is an option that can mitigate the burden to customers and wireless service providers of reprogramming phones. The Industry Petition is silent on a recommendation. However, examination of the minutes of the Industry September 27, 1999, meeting reveals varying positions concerning the issue. Among the comments expressed were that the Commission might allow grandfathering, that limited grandfathering for specific NXXs was allowed when NPA 602 relief was addressed and that at least one wireless provider was not in favor of any grandfathering because it requires ten-digit dialing between wireline and wireless phones in the same service area. Finally, one wireless service provider, in its comments, requested that the option to grandfather codes be allowed subject to a condition that duplication of any grandfathered codes would not be requested in the new NPA.

B. Public Comment Meetings

The Commission held a series of public comment meetings around the State at locations within the 520 area code in an attempt to garner input on the public's preference with respect to the relief options under consideration. During the months of October and November 2000, public comment meetings were held in the cities of Kingman, Tucson, Flagstaff and Prescott.

Because attendance was relatively light, the meetings did not provide much insight into which relief method the public preferred. Of the customers present at the meetings, opinion was somewhat more favorable toward the "geographic split" method of relief than the "overlay" method.

A relatively small number of written public comments have been sent to the Commission for consideration as part of this proceeding. In general, residential customers favored a "geographic split" as the relief method while business customers favored an "overlay". Several commenters expressed the belief that splitting into more than two NPAs would be advantageous.

In addition, several customers have provided opinions via telephone calls to the Commission's Consumer Services Division. For these customers, the majority were in favor of a "geographic split" as the relief method.

IV. RELIEF OBJECTIVE OR GOALS

In examining this issue, the Commission must weigh the importance of a variety of factors that affect all or a portion of the telecommunications users in the 520 area code. Compounding the difficulty of this task is the knowledge that regardless of the plan chosen, all of the options include attributes that both consumers and the industry may find confusing, disruptive or objectionable.

The following four considerations or objectives are either identified in Industry guidelines or FCC Orders on NPA exhaust, and, thus, it is important that the Commission consider them in making its decision. First, the plan selected should maximize the time frame before another disruptive NPA relief action is necessary. Second, the relief method selected should be competitively neutral. Third, the plan should minimize the total costs to all affected parties. Fourth, the relief option chosen should be the least confusing and disruptive to customers and take into account customer preferences.

A. Maximize Time Before Additional Relief Is Required

A common concern, and one expressed in public comments, relates to the relief planning process in general and the length of the relief period for the selected method. It is important to try to avoid another exhaust situation for as long as possible because of the disruption and confusion to the public caused by changes in telephone numbers.

NANPA Code relief guidelines recommend that proposed relief alternatives shall cover a period of at least five years beyond the predicted date of exhaust, that customers who undergo number changes not be required to change again for a period of eight to ten years and that, in the case of splits, all of the codes shall exhaust about the same time. Both of the alternatives considered prior to the Industry consensus decision were consistent with this criteria.

C. Minimizes Costs to Both Consumers and the Industry

Either method of NPA relief comes with a price tag to Industry and consumers. With a "geographic split", costs will be incurred by approximately 40 to 50 percent of the existing 520 customers to change their current NPA to the new NPA. The costs to business will include changing vehicle markings, stationery and other printed material, promotional materials, and anything else that displays a company's telephone number. Other costs that may be incurred would include reprogramming of customer premises equipment, cellular telephones and alarm systems. Both residential and business customers would have to notify clients, friends and family of their new NPA. Any future NPA "geographic splits" would result in similar costs every time additional relief is required.

On the other hand, there are also substantial costs associated with an "overlay". Businesses, where they are not already doing so, will bear the costs of printing all 10-digits of their number on stationery, vehicles, promotional material and anything else that displays the company's telephone number. All telephone systems, alarm systems and customer premises equipment will have to be reprogrammed to accommodate mandatory 10-digit local dialing. Both residence and business customers would have to revise speed-call lists with the full 10-digits of a telephone number contained in the lists.

Both relief methods will also require changes in central office switch databases, dialing plans and routing translations. Substantial direct and indirect costs, to Industry and consumers alike, will be incurred under either the "geographic split" or the "overlay" relief method. While the Industry did not submit any specific cost data for either a "geographic split" or an "overlay" (Citizens Utilities estimated the average cost of a "split" at \$35,000 per central office and \$2.00 per directory number), Staff believes that, in the long run, the "overlay" may offer a cost advantage because Industry area code relief activity is minimized and fewer customers may have to incur costs.

D. Minimizes Confusion and Disruption to Customers

The final factor relates to the adverse impacts upon consumers under both relief methods. The impact upon customers is perhaps the single most important factor that the Commission must consider when making its decision. The disruption and confusion caused by changes in telephone numbers affect not only customers located in the current 520 NPA, but these changes also affect callers in other parts of the state and country who place calls to the affected area. Neither the "geographic split" nor the "overlay" will be completely transparent.

Examination of the record reveals that both methods of relief have advantages and disadvantages as far as their impact on both end-users and telecommunications providers. The "geographic split" has been in existence longer and has been successfully implemented in many metropolitan and rural areas. Residential customers, in particular, appear to prefer the

"geographic split" for a variety of reasons. However, "overlays" have become increasingly popular in some areas of the country. Staff believes overlays may be better suited in metropolitan areas where the geographic area effected is relatively small.

A "geographic split" will require between 40 to 50 percent of the existing 520 customers to change their current telephone numbers. The "overlay does not require any existing customers to change their telephone numbers, and therefore, avoids this considerable initial disruption to almost half of the customers in the affected 520 area code.

The "geographic split" may be less confusing to consumers when one considers that the geographic identity of area codes remains intact. Thus, if a customer wants to call a friend in Yuma, for example, he or she should be able to associate that location with a particular area code. Also alleviated is the potential confusion created by having different area codes in the same neighborhood, residence or business location. The results of a 1998 Commission poll of subscribers in Maricopa County affected by the exhaust of the 602 NPA found that of those surveyed, a "geographic split" was favored over an "overlay" by a 2 to 1 margin.

From a customer perspective, that alternative "geographic split" method Staff requested be analyzed may be an attractive option because, to the extent that rate center boundaries allow, it approximates county lines making it easier to remember what communities are in which NPA.

Dialing patterns is another concern that is minimized with a "geographic split". Many commenters believe that retaining 7-digit dialing for local calls lessens confusion for consumers. They also argue that an "overlay's" mandatory 10-digit dialing for local calls will be particularly difficult for older citizens and children.

The Commission must attempt to find a reasonable balance for consumers, taking into account the large geographic area covered by the current 520 area code that includes both rural and urban communities. Taking all of the above factors into account, it appears a "geographic split" most closely achieves the balance desired, for the Tucson and outlying area.

V. NUMBER CONSERVATION MEASURES

Rate center consolidation was implemented in the Tucson calling area on June 10, 2000. This will reduce the number of NXX codes new service providers need to compete within that calling area.

On March 31, 2000, the FCC released an Order (In The Matter of Numbering Resource Optimization, Docket No. 99-200, ("Number Optimization Order")) with the stated goals of ensuring that the limited numbering resources of the North American Number Plan ("NANP") are used efficiently and that all carriers have the numbering resources they need to compete in the rapidly growing market place. The FCC adopted a single system for allocating numbers in blocks of 1,000, wherever possible, and establishing a plan for national rollout of thousands-block number pooling.

Furthermore, in the Number Optimization Order the FCC adopted administrative and technical measures that will promote more efficient allocation and use of NANP resources. Among the measures adopted are:

- a. A uniform set of categories of numbers for which carriers must report their utilization.
- b. A mandatory utilization data reporting requirement.
- c. A process that requires carriers to demonstrate that they need numbering resources to provide services.
- d. A utilization threshold framework to increase carrier accountability.
- e. Numbering resource reclamation requirements to ensure the return of unused numbers to the NANP inventory.
- f. A mandate that carriers fill their need for numbers out of "open" thousands blocks before beginning to use numbers from new blocks.

The FCC continues to develop, adopt and implement a number of strategies to ensure that the numbering resources of the NANP are used efficiently. In its NRO Second Report and Order (In the Matter of Number Resource Optimization, et. al., Second Report and Order, et. al., Docket No. 99-200, et. al., Released December 29, 2000), the FCC adopted additional measures to promote efficient allocation of NANP resources which include:

- a. Establishment of a utilization threshold of 60 percent (increasing to 75 percents over three years) that carriers must meet before receiving additional numbering resources in a given rate center.
- b. Not setting a transition period between the time CMRS carriers must implement LNP (November 24, 2002) and the time they must participate in mandatory number pooling.
- c. A comprehensive audit program to verify carrier compliance with federal rules and orders and industry guidelines.

Commission Staff requested Industry comment on whether adoption of number pooling, as defined in the Federal Communication Commission's ("FCC") Order on Number Resource Optimization (CC Docket No. 99-200) should be incorporated into the Industry recommended relief plan. One commenter was in favor but provided no substantive support for the recommendation. Other commenters recommended that number pooling not be included as part of the relief plan. A summary of the reasons given in support of this position is:

- a. The FCC has reiterated its position that number conservation measures are not to be substituted for timely area code relief.
- b. The FCC has established a national plan to roll out number pooling in the top 100 Metropolitan Statistical Areas.
- c. Number Portability Administrative Center software upgrade (Release 3.0) is currently scheduled for the Western Region mid-February 2001.
- d. A state pooling trial may have higher implementation costs for the Industry and will require a state specific cost recovery mechanism.
- e. The selection of a state Pooling Administrator may be superceded by the FCC's selection of a national Pooling Administrator.
- f. Limited benefit can be achieved in an area code at risk for short-term exhaust.

In a separate proceeding to be brought before the Commission, implementation of a State number pooling trial prior to the national rollout, and the issues associated with it, will be addressed. However, neither the national rollout of number pooling or implementation of a State number pooling trial, alleviates the necessity for a relief plan for the 520 NPA because it is so close to projected exhaust.

VI. IMPLEMENTATION ISSUES

A. Permissive Dialing Periods

Staff notes that a four-month permissive dialing period is the shortest period recommended in the Industry Guidelines. However implementation of mandatory dialing prior to a traditionally busy holiday season could prove to be detrimental to both business and residential customers. Therefore, Staff recommends that a permissive dialing period commence June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002 and activation of the relief area code occur on March 9, 2002.

B. Future NXX Code Allocation

On January 3, 2001, Staff requested the NPA Relief Planner for Arizona to determine the quantity of NXX codes available for assignment in the 520 NPA as of December 31, 2000, and the average number of new codes being assigned per month. On that date there were 101 NXX codes available and NXX code assignments were averaging six codes per month.

Staff recommends that NXX code usage be closely monitored, as any spike in usage could make it necessary for NeuStar NANPA, the current NXX code administrator for the 520

NPA, to declare the 520 NPA in jeopardy. A jeopardy situation is serious because it indicates that the forecasted and/or actual demand for NXX codes will exceed the known supply during the planning/implementation interval for NPA relief.

In general, during a jeopardy situation the NXX Code Administrator attempts to prevent NXX exhaustion by obtaining Industry consensus on a method of NXX code allocation. If the Industry fails to reach consensus, the Code Administrator would request the Commission to establish an allocation procedure. Staff recommends that the Commission require prior notification to Staff by NANPA before any declaration of jeopardy in the 520 area code and before any new allocation procedure is implemented.

C. Consumer Education

Staff recommends that the Commission require the Industry to develop a comprehensive customer education program similar to the program used in the Phoenix metropolitan area in conjunction with implementation of the "geographic split" of the 602 NPA.

Staff believes that customer education is a key element in the successful implementation of a relief plan. Further, since everyone, including the wireless and new wireline entrants, benefits from the successful introduction of the new NPA, all service providers should pay a pro-rata share of the customer education program based on the number of NXX codes they control.

VII. CONCLUSIONS

Upon examination of the Petition for NPA Relief Plan for the 520 NPA filed by Industry, the Industry consensus recommendation, Industry and public comments and facts addressed above, Staff recommends:

- a. That the Commission adopt a two-way geographic split with the existing 520 rate centers within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA. (Ajo, Benson, Bisbee, Blackwater, Bowie, Casa Blanca, Casa Grande, Cascabel, Coolidge, Douglas, Elfrida, Eloy, Florence, Hayden, Komatke, Lone Butte, Maricopa Village, Maricopa, Nogales, Patagonia, Pearce, Portal, Sacaton, San Manuel, San Simon, Santa Rosa, Sasabe, Sells, Sierra Vista, Stutonic, Sunizona, Superior, Tombstone, Tucson, West San Simon, Whitlow and Willcox rate centers.) The remaining area would be assigned the new area code.
- b. That the Commission order that permissive dialing begin on June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002, and activation of the relief area code occur March 9, 2002.
- c. That the Industry develop a comprehensive customer education program and that a pro-rata share of the costs of such customer education program be paid by

all telecommunications service providers based upon the number of NXX codes they control.

- d. That wireless service providers be allowed the option to grandfather codes subject to the condition that duplication of any grandfathered codes would not be requested in the new NPA.
- e. That the Commission require prior notification by NANPA to Staff before any declaration of jeopardy in the 520 area code and implementation of a new allocation procedure.



Deborah R. Scott
Director
Utilities Division

DRS:RLB:lhM\MAS

ORIGINATOR: Richard Boyles

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 WILLIAM A. MUNDELL
Chairman
3 JIM IRVIN
Commissioner
4 MARC SPITZER
Commissioner
5

6 IN THE MATTER OF GENERIC INVESTIGATION)
ON INDUSTRY PETITION FOR APPROVAL OF)
7 AN NPA RELIEF PLAN FOR THE 520 NPA)
8)

DOCKET NO. T-00000F-99-0641
DECISION NO. _____
ORDER

9 Open Meeting
February 13 and 14, 2001
10 Phoenix, Arizona

11 **BY THE COMMISSION:**

12 Competition in the local telephone market, and the increasing demand for telephone
13 numbers to provide second lines, fax machines, modems, wireless service and new enhanced services
14 has resulted in a projected exhaust of the 520 area code in late-2001 (NANPA April, 2000 analysis,
15 updated October 6, 2000). The 520 area code was established in 1995 for all locations outside of the
16 Phoenix metropolitan and suburban area when the first exhaust of the 602 area code occurred.

17 FINDINGS OF FACT

18 **I. BACKGROUND AND PROCEDURAL HISTORY**

19 **A. State Proceedings**

20 1. On November 8, 1999, the North American Plan Administrator ("NANPA") Lockheed
21 Martin IMS (currently known as NeuStar, Inc. ["NeuStar"]) on behalf of the Arizona
22 Telecommunications Industry ("Industry") filed a Petition for Approval of a NPA Relief Plan for the
23 520 Numbering Plan Area (NPA). In its petition the Industry estimates that without NPA relief the
24 supply of central office codes will exhaust in late 2001.

25 2. The Industry was unable to reach consensus¹ on a final relief plan and asked the
26 Commission to approve one of two proposed relief plans for the 520 NPA. The two proposed Industry
27

28 ¹ Consensus is established when substantial agreement has been reached among interest groups participating in the
consideration of the subject at hand. ... Substantial agreement means more than a simple majority, but not necessarily
unanimity., INC97-0414-016, November 13, 2000.

1 relief plans are: a geographic split with the Tucson/Nogales areas retaining the 520 NPA, or an all-
2 services overlay for the entire geographic area encompassed by the 520 NPA.

3 3. On March 6, 2000, Commission Staff requested NANPA schedule a conference call with
4 the Industry in an effort to arrive at an Industry consensus on a single relief plan. In response to this
5 request NANPA scheduled a conference call for April 19, 2000. Following a review of the two
6 proposed relief plans the Industry reached consensus on an overlay covering the entire geographic area
7 presently served by the 520 area code as the Industry recommended relief plan for the 520 NPA.

8 4. On May 8, 2000, Commission Staff requested that NANPA update the plan that was
9 filed with its Petition to reflect the subsequent activity by the Industry and the consensus
10 recommendation that was arrived at. On June 1, 2000, NANPA filed an Addendum to its petition in
11 the above-captioned proceeding to notify the Commission of the Industry's consensus decision to
12 recommend an all-services overlay as the method of relief for the 520 NPA.

13 5. On June 10, 2000, the Tucson rate center was consolidated from seven rate centers to one
14 expanded rate center in an effort to conserve NXXs. The local calling area for Tucson consumers was
15 not changed by this consolidation.

16 6. On June 14, 2000, Commission Staff invited affected telecommunications service
17 providers and other interested parties to submit written comments to the Commission on the Industry
18 proposed overlay relief plan. Parties were requested to file written comments on or before June 30,
19 2000, and reply comments on or before July 14, 2000. Initial Comments were filed by AT&T
20 Communications of the Mountain States, Inc. (AT&T"), Cox Arizona Telecom, L.L.C. ("Cox"),
21 Citizens Mohave Cellular ("Mohave Wireless"), WorldCom, Inc. ("WorldCom") and U S WEST
22 Communications, Inc., n/k/a/ Qwest Corporation. Citizens Utilities Company ("Citizens") filed
23 comments prior to Staff's request. Reply Comments were filed by Cox and WorldCom.

24 7. On November 10, 2000, NANPA responded to a Staff request to analyze an additional
25 relief alternative. This alternative modified the Industry split alternative by removing the Miami,
26 Globe and San Carlos rate areas in Gila County from the area that would retain the 520 NPA. In
27 addition, the 520 NPA as represented in the Industry split alternative would be expanded to include
28 the remaining rate areas in Pima County and all rate areas in Cochise County.

1 8. The Commission held a series of public input hearings around the State in an attempt to
2 garner input on the public's preference with respect to the recommended all-services overlay as well
3 as the proposed split option which had been considered by the Industry. During the months of
4 October and November 2000, public input hearings were held in Kingman, Tucson, Flagstaff and
5 Prescott.

6 **B. Related Federal Proceedings**

7 9. On December 23, 1999, the Arizona Corporation Commission ("Commission") petitioned
8 the Federal Communications Commission ("FCC") for "Expedited Delegation of Authority to
9 Implement Number Conservation Measures." The Commission requested additional authority to: (1)
10 implement mandatory thousands-block number pooling; (2) ensure efficient number use practices such
11 as fill rates or sequential number assignment; (3) establish interim mandatory number utilization data
12 reporting and forecasting requirements; (4) establish auditing procedures and implement random
13 audits; (5) require the return of unused NXX codes (prefixes) by carriers to the code administrator; and
14 (6) require the return of unused or under-utilized portions of NXX codes to the Pooling Administrator
15 when one is selected.

16 10. On May 1, 2000, the Commission filed with the FCC a supplement to its Petition for
17 Delegated Authority pursuant to paragraph 170 of the FCC's Numbering Resource Optimization Order
18 (CC Docket No. 99-200).

19 11. On July 20, 2000, the FCC addressed the Delegation of Authority petitions of Arizona
20 and several other states (In the Matter of Numbering Resource Optimization, et. al., Docket No. 99-
21 200 et. al., Order [rel. July 20, 2000]). The FCC conditionally granted Arizona the authority to
22 conduct audits of carriers' use of numbering resources and the authority to institute thousands-block
23 number pooling in the 480, 520, 602 and 623 NPAs. Other aspects of the Commission's Petition were
24 not ruled upon because the FCC, in the Number Resource Optimization Order, had already addressed
25 those specific numbering resource optimization measures.

26 ...

27 ...

28 ...

1 **II. RELIEF ALTERNATIVES**

2 **A. The "Geographic Split"**

3 12. A "Geographic Split" involves splitting the affected area into two separate NPA codes.
4 Under this relief method, the geographic significance of area codes is retained since it divides the
5 original area code and geography into two separate area codes and geographies.

6 13. The customers in the old area code are least affected since they retain the same 10-digit
7 telephone number. Subscribers in the second area code keep the last 7-digits of their existing
8 telephone number but have a new area code.

9 14. Under the Geographic Split, 7-digit dialing for local calling would continue within each
10 NPA; however, 10-digit dialing would be required between NPAs or area codes.

11 **B. The "Overlay"**

12 15. With the "Overlay" method of relief, the new NPA or area code would be "overlaid" on
13 top of the existing 520 area code. This means that all existing customers would keep their current
14 10-digit telephone number with the 520 area code. As NXXs in the overlay code are assigned to
15 carriers, most new customers and other new service requests would receive telephone numbers in the
16 new NPA. This is what is commonly referred to as an "all services overlay".

17 16. Under existing FCC rules and regulations, implementation of an Overlay is subject to the
18 following conditions:

- 19 a. Mandatory 10-digit dialing for all local telephone calls in the future in the affected
20 area regardless of whether the calls are within or between NPAs.
- 21 b. Provision of at least one central office code from the existing NPA to all service
22 providers who have been authorized to provide telecommunications services 90 days
prior to the introduction of the new area code.

23 **III. POSITION OF INTERESTED PARTIES AND AFFECTED CARRIERS**

24 **A. Affected Carriers**

25 17. Of the affected carriers who have filed written comments, AT&T, Cox and WorldCom
26 supported a geographic split. However AT&T stated that while its preference was a geographic split
27 it would also support an overlay subject to certain conditions. Citizens, Mohave Wireless and Qwest
28 supported an all-services overlay.

1 18. The positions taken by those commenters favoring an all-services overlay may be
2 generally summarized by the following:

- 3 a. Allows existing customers to keep their current ten-digit telephone number.
4 b. Cellular customers are not required to have their handsets reprogrammed.
5 c. Least cost for both customers and rural service providers.
6 d. Future area codes can be added without customers having to make any more changes.
7 e. Does not require customers who were required to take a number change in 1995 to
8 be subject to another.
9

10 19. The positions taken by those commenters **not** in favor an all-services overlay may be
11 generally summarized by the following:

- 12 a. Requires the loss of all seven-digit local dialing.
13 b. Lose ability to associate an area code with a unique geographic area.
14 c. Consumer confusion may arise from different area codes being assigned in the same
15 home, business or neighborhood.
16 d. May not alleviate the cost to customers for such things as revisions to advertising,
17 stationary or other material containing a seven-digit telephone number,
18 reprogramming equipment with automatic dialers or revisions to PBX systems.
19 e. Can negatively impact entry into the market place by competitive local exchange
20 carriers.

21 20. Additional positions taken by those commenters favoring a geographic split may be
22 generally summarized by the following:

- 23 a. A split is competitively neutral with respect to telecommunications providers.
24 b. Many consumer surveys indicate a customer preference for geographic splits versus
25 all service overlays.
26 c. Most widely accepted method of NPA relief.
27 d. The very large geographic area is conducive to a split.
28 ...

e. Rural areas would not be required to implement mandatory ten-digit local dialing prior to urban areas.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

21. Additional positions taken by those commenters **not** in favor of a geographic split may be generally summarized by the following:

- a. A geographic split is a less permanent solution.
- b. Future relief may be more readily accomplished through additional overlays.

22. Unlike wireline phones, wireless phones need to be physically reprogrammed to accommodate a change in area code. Grandfathering of wireless codes, in the event of a geographic split, is an option that can mitigate the burden to customers and wireless service providers of reprogramming phones. The Industry Petition is silent on a recommendation. However, examination of the minutes of the Industry September 27, 1999 meeting reveals varying positions concerning the issue. Among the comments expressed were that the Commission might allow grandfathering, that limited grandfathering for specific NXXs was allowed when NPA 602 relief was addressed and that at least one wireless provider was not in favor of any grandfathering because it requires ten-digit dialing between wireline and wireless phones in the same service area. Finally, one wireless service provider, in its comments, requested that the option to grandfather codes be allowed subject to a condition that duplication of any grandfathered codes would not be requested in the new NPA.

B. Public Comment Meetings

23. The Commission held a series of public comment meetings around the State at locations within the 520 area code in an attempt to garner input on the public's preference with respect to the relief options under consideration. During the months of October and November 2000, public comment meetings were held in the cities of Kingman, Tucson, Flagstaff and Prescott. Because attendance was relatively light, the meetings did not provide much insight into which relief method the public preferred. Of the customers present at the meetings, opinion was somewhat more favorable toward the "geographic split" method of relief than the "overlay" method.

...
...
...

1 24. A relatively small number of written public comments have been sent to the Commission
2 for consideration as part of this proceeding. In general, residential customers favored a "geographic
3 split" as the relief method while business customers favored an "overlay". Several commenters
4 expressed the belief that splitting into more than two NPAs would be advantageous.

5 25. In addition, several customers have provided opinions via telephone calls to the
6 Commission's Consumer Services Division. For these customers, the majority were in favor of a
7 "geographic split" as the relief method.

8 **IV. RELIEF OBJECTIVE OR GOALS**

9 26. In examining this issue, the Commission must weigh the importance of a variety of
10 factors that affect all or a portion of the telecommunications users in the 520 area code. Compounding
11 the difficulty of this task is the knowledge that regardless of the plan chosen, all of the options include
12 attributes that both consumers and the industry may find confusing, disruptive or objectionable.

13 27. The following four considerations or objectives are either identified in Industry
14 guidelines or FCC Orders on NPA exhaust, and thus it is important that the Commission consider them
15 in making its decision. First, the plan selected should maximize the time frame before another
16 disruptive NPA relief action is necessary. Second, the relief method selected should be competitively
17 neutral. Third, the plan should minimize the total costs to all affected parties. Fourth, the relief option
18 chosen should be the least confusing and disruptive to customers and take into account customer
19 preferences.

20 **A. Maximize Time Before Additional Relief Is Required**

21 28. A common concern, and one expressed in public comments, relates to the relief planning
22 process in general and the length of the relief period for the selected method. It is important to try to
23 avoid another exhaust situation for as long as possible because of the disruption and confusion to the
24 public caused by changes in telephone numbers.

25 29. NANPA Code relief guidelines recommend that proposed relief alternatives shall cover
26 a period of at least five years beyond the predicted date of exhaust, that customers who undergo
27 number changes not be required to change again for a period of eight to ten years and that, in the case

28 . . .

1 of splits, all of the codes shall exhaust about the same time. Both of the alternatives considered prior
2 to the Industry consensus decision were consistent with this criteria.

3 Split Life Expectancy: 520 NPA - approximately 159 months
4 New NPA - approximately 148 months
5 Overlay Life Expectancy: - approximately 149 months

6 30. The additional relief alternative that NANPA analyzed at the request of Staff also meets
7 industry guidelines for assignment of a relief NPA. The projected lives of the 520 area code and the
8 new relief area code are as follows:

9 520 NPA - approximately 132 months
10 New NPA - approximately 168 months

11 31. Industry Guidelines recommend that the Commission not adopt any relief measure that
12 is estimated to last less than five years. According to Industry estimates, each of the relief methods
13 under consideration meet this criteria. Given the inherent difficulties in forecasting demand for NXXs
14 ten or more years in the future, the expected life for each of the alternatives does not differ
15 significantly. In addition, for either of the "geographic split" options, future implementation of number
16 pooling in the NPA that contains the Tucson metropolitan area, either as part of a national
17 implementation or a state trial, should extend the forecast life of that NPA.

18 B. **The Relief Option Chosen is Competitively Neutral**

19 32. Another important objective identified in FCC Orders on NPA Exhaust should be to
20 minimize any adverse impact upon emerging competition in the local telephone market in the affected
21 area. Some telephone providers, particularly competitive local exchange carriers ("CLECs"), oppose
22 an "overlay" because it places them at a competitive disadvantage.

23 33. Regardless of the plan selected, NPA relief may have some effect on competition. The
24 crux of this issue, however, centers on the new service provider's ability to have access to the
25 supposedly more desirable NXX codes in the 520 NPA in the event an "overlay" is the selected relief
26 method.

27 34. Many of the anti-competitive concerns of an "overlay" can be alleviated where Local
28 Number Portability ("LNP") has been implemented; primarily in the Tucson calling area. With LNP,

1 existing telephone subscribers may change carriers and keep their existing telephone numbers. Future
2 implementation of number pooling, which is based upon LNP capability, will further alleviate this
3 concern.

4 35. However, since LNP capability is not ubiquitously deployed in rural Arizona, if
5 competition were to develop in these communities, a "geographic split" would be more competitively
6 neutral than an "overlay". This is because the "geographic split" method provides a pool of new NXXs
7 in each NPA giving new service providers access to those codes on an equal basis with the incumbent
8 carrier.

9 C. **Minimizes Costs to Both Consumers and the Industry**

10 36. Either method of NPA relief comes with a price tag to Industry and consumers. With a
11 "geographic split", costs will be incurred by approximately 40 to 50 percent of the existing 520
12 customers to change their current NPA to the new NPA. The costs to business will include changing
13 vehicle markings, stationery and other printed material, promotional materials, and anything else that
14 displays a company's telephone number. Other costs that may be incurred would include
15 reprogramming of customer premises equipment, cellular telephones and alarm systems. Both
16 residential and business customers would have to notify clients, friends and family of their new NPA.
17 Any future NPA "geographic splits" would result in similar costs every time additional relief is
18 required.

19 37. On the other hand, there are also substantial costs associated with an "overlay".
20 Businesses, where they are not already doing so, will bear the costs of printing all 10-digits of their
21 number on stationery, vehicles, promotional material and anything else that displays the company's
22 telephone number. All telephone systems, alarm systems and customer premises equipment will have
23 to be reprogrammed to accommodate mandatory 10-digit local dialing. Both residence and business
24 customers would have to revise speed-call lists with the full 10-digits of a telephone number contained
25 in the lists.

26 38. Both relief methods will also require changes in central office switch databases, dialing
27 plans and routing translations. Substantial direct and indirect costs, to Industry and consumers alike,
28 will be incurred under either the "geographic split" or the "overlay" relief method. While the Industry

1 did not submit any specific cost data for either a "geographic split" or an "overlay" (Citizens Utilities
2 estimated the average cost of a "split" at \$35,000 per central office and \$2.00 per directory number),
3 Staff believes that, in the long run, the "overlay" may offer a cost advantage because Industry area code
4 relief activity is minimized and fewer customers may have to incur costs.

5 D. **Minimizes Confusion and Disruption to Customers**

6 39. The final factor relates to the adverse impacts upon consumers under both relief methods.
7 The impact upon customers is perhaps the single most important factor that the Commission must
8 consider when making its decision. The disruption and confusion caused by changes in telephone
9 numbers affect not only customers located in the current 520 NPA, but these changes also affect callers
10 in other parts of the state and country who place calls to the affected area. Neither the "geographic
11 split" nor the "overlay" will be completely transparent.

12 40. Examination of the record reveals that both methods of relief have advantages and
13 disadvantages as far as their impact on both end-users and telecommunications providers. The
14 "geographic split" has been in existence longer and has been successfully implemented in many
15 metropolitan and rural areas. Residential customers, in particular, appear to prefer the "geographic
16 split" for a variety of reasons. However, "overlays" have become increasingly popular in some areas
17 of the country. Staff believes overlays may be better suited in metropolitan areas where the geographic
18 area effected is relatively small.

19 41. A "geographic split" will require between 40 to 50 percent of the existing 520 customers
20 to change their current telephone numbers. The "overlay does not require any existing customers to
21 change their telephone numbers, and therefore, avoids this considerable initial disruption to almost half
22 of the customers in the affected 520 area code.

23 42. The "geographic split" may be less confusing to consumers when one considers that the
24 geographic identity of area codes remains intact. Thus, if a customer wants to call a friend in Yuma,
25 for example, he or she should be able to associate that location with a particular area code. Also
26 alleviated is the potential confusion created by having different area codes in the same neighborhood,

27 ...

28 ...

1 residence or business location. The results of a 1998 Commission poll of subscribers in Maricopa
2 County affected by the exhaust of the 602 NPA found that of those surveyed, a "geographic split" was
3 favored over an "overlay" by a 2 to 1 margin.

4 43. From a customer perspective, that alternative "geographic split" method Staff requested
5 be analyzed may be an attractive option because, to the extent that rate center boundaries allow, it
6 approximates County lines making it easier to remember what communities are in which NPA.

7 44. Dialing patterns is another concern that is minimized with a "geographic split". Many
8 commenters believe that retaining 7-digit dialing for local calls lessens confusion for consumers. They
9 also argue that an "overlay's" mandatory 10-digit dialing for local calls will be particularly difficult for
10 older citizens and children.

11 45. The Commission must attempt to find a reasonable balance for consumers, taking into
12 account the large geographic area covered by the current 520 area code that includes both rural and
13 urban communities. Taking all of the above factors into account, it appears a "geographic split" most
14 closely achieves the balance desired, for the Tucson and outlying area.

15 **V. NUMBER CONSERVATION MEASURES**

16 46. Rate center consolidation was implemented in the Tucson calling area on June 10, 2000.
17 This will reduce the number of NXX codes new service providers need to compete within that calling
18 area.

19 47. On March 31, 2000, the FCC released an Order (In The Matter of Numbering Resource
20 Optimization, Docket No. 99-200, ["Number Optimization Order"]) with the stated goals of ensuring
21 that the limited numbering resources of the North American Number Plan ("NANP") are used
22 efficiently and that all carriers have the numbering resources they need to compete in the rapidly
23 growing market place. The FCC adopted a single system for allocating numbers in blocks of 1,000,
24 wherever possible, and establishing a plan for national rollout of thousands-block number pooling.

25 48. Furthermore, in the Number Optimization Order the FCC adopted administrative and
26 technical measures that will promote more efficient allocation and use of NANP resources. Among
27 the measures adopted are:

28 ...

- 1 a. A uniform set of categories of numbers for which carriers must report their utilization.
- 2 b. A mandatory utilization data reporting requirement.
- 3 c. A process that requires carriers to demonstrate that they need numbering resources to provide services.
- 4
- 5 d. A utilization threshold framework to increase carrier accountability.
- 6
- 7 e. Numbering resource reclamation requirements to ensure the return of unused numbers to the NANP inventory.
- 8
- 9 f. A mandate that carriers fill their need for numbers out of "open" thousands blocks before beginning to use numbers from new blocks.

10 49. The FCC continues to develop, adopt and implement a number of strategies to ensure that
11 the numbering resources of the NANP are used efficiently. In its NRO Second Report and Order (In
12 the Matter of Number Resource Optimization, et. al., Second Report and Order, et. al., Docket No. 99-
13 200, et. al., Released December 29, 2000), the FCC adopted additional measures to promote efficient
14 allocation of NANP resources which include:

- 15 a. Establishment of a utilization threshold of 60 percent (increasing to 75
16 percent over three years) that carriers must meet before receiving additional
17 numbering resources in a given rate center.
- 18 b. Not setting a transition period between the time CMRS carriers must
19 implement LNP (November 24, 2002) and the time they must participate
20 in mandatory number pooling.
- 21 c. A comprehensive audit program to verify carrier compliance with federal
22 rules and orders and industry guidelines.

23 50. Commission Staff requested Industry comment on whether adoption of number pooling,
24 as defined in the Federal Communication Commission's ("FCC") Order on Number Resource
25 Optimization (CC Docket No. 99-200) should be incorporated into the Industry recommended relief
26 plan. One commenter was in favor but provided no substantive support for the recommendation.
27 Other commenters recommended that number pooling not be included as part of the relief plan. A
28 summary of the reasons given in support of this position is:

...

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- a. The FCC has reiterated its position that number conservation measures are not to be substituted for timely area code relief.
- b. The FCC has established a national plan to roll out number pooling in the top 100 Metropolitan Statistical Areas.
- c. Number Portability Administrative Center software upgrade (Release 3.0) is currently scheduled for the Western Region mid-February 2001.
- d. A state pooling trial may have higher implementation costs for the Industry and will require a state specific cost recovery mechanism.
- e. The selection of a state Pooling Administrator may be superceded by the FCC's selection of a national Pooling Administrator.
- f. Limited benefit can be achieved in an area code at risk for short-term exhaust.

51. In a separate proceeding to be brought before the Commission, implementation of a State number pooling trial prior to the national rollout, and the issues associated with it, will be addressed. However, neither the national rollout of number pooling or implementation of a State number pooling trial, alleviates the necessity for a relief plan for the 520 NPA because it is so close to projected exhaust.

VI. IMPLEMENTATION ISSUES

A. Permissive Dialing Periods

52. Staff notes that a four-month permissive dialing period is the shortest period recommended in the Industry Guidelines. However, implementation of mandatory dialing prior to a traditionally busy holiday season could prove to be detrimental to both business and residential customers. Therefore, Staff recommends that a permissive dialing period commence June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002, and activation of the relief area code occur on March 9, 2002.

B. Future NXX Code Allocation

53. On January 3, 2001, Staff requested the NPA Relief Planner for Arizona to determine the quantity of NXX codes available for assignment in the 520 NPA as of December 31, 2000 and the average number of new codes being assigned per month. On that date, there were 101 NXX codes available and NXX code assignments were averaging six codes per month.

1 54. Staff recommends that NXX code usage be closely monitored, as any spike in usage
2 could make it necessary for NeuStar NANPA, the current NXX code administrator for the 520 NPA,
3 to declare the 520 NPA in jeopardy. A jeopardy situation is serious because it indicates that the
4 forecasted and/or actual demand for NXX codes will exceed the known supply during the
5 planning/implementation interval for NPA relief.

6 55. In general, during a jeopardy situation the NXX Code Administrator attempts to prevent
7 NXX exhaustion by obtaining Industry consensus on a method of NXX code allocation. If the Industry
8 fails to reach consensus, the Code Administrator would request the Commission to establish an
9 allocation procedure. Staff recommends that the Commission require prior notification to Staff by
10 NANPA before any declaration of jeopardy in the 520 area code and before any new allocation
11 procedure is implemented.

12 **C. Consumer Education**

13 56. Staff recommends that the Commission require the Industry to develop a comprehensive
14 customer education program similar to the program used in the Phoenix metropolitan area in
15 conjunction with implementation of the "geographic split" of the 602 NPA.

16 57. Staff believes that customer education is a key element in the successful implementation
17 of a relief plan. Further, since everyone, including the wireless and new wireline entrants, benefits
18 from the successful introduction of the new NPA, all service providers should pay a pro-rata share of
19 the customer education program based on the number of NXX codes they control.

20 **VII. STAFF RECOMMENDATION**

21 58. Upon examination of the Petition for NPA Relief Plan for the 520 NPA filed by Industry,
22 the Industry consensus recommendation, Industry and public comments and Findings of Fact Nos.
23 1 through 57, Staff has recommended:

- 24 a. That the Commission adopt a two-way geographic split with the existing 520 rate
25 centers within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA.
26 (Ajo, Benson, Bisbee, Blackwater, Bowie, Casa Blanca, Casa Grande, Cascabel,
27 Coolidge, Douglas, Elfrida, Eloy, Florence, Hayden, Komatke, Lone Butte, Maricopa
28 Village, Maricopa, Nogales, Patagonia, Pearce, Portal, Sacaton, San Manual, San
Simon, Santa Rosa, Sasabe, Sells, Sierra Vista, Stutonic, Sunizona, Superior,
Tombstone, Tucson, West San Simon, Whitlow and Willcox rate centers.) The
remaining area would be assigned the new area code.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- b. That the Commission order that permissive dialing begin on June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002 and activation of the relief area code occur March 9, 2002.
- c. That the Industry develop a comprehensive customer education program and that a pro-rata share of the costs of such customer education program be paid by all telecommunications service providers based upon the number of NXX codes they control.
- d. That wireless service providers be allowed the option to grandfather codes subject to the condition that duplication of any grandfathered codes would not be requested in the new NPA.
- e. That the Commission require prior notification by NANPA to Staff before any declaration of jeopardy in the 520 area code and implementation of a new allocation procedure.

CONCLUSIONS OF LAW

- 1. The Commission has jurisdiction over the subject matter of this investigation.
- 2. The recitals of Fact and Conclusions of Law set forth above are supported by the record and are hereby adopted as Findings of Fact and Conclusions of Law.
- 3. The record in this proceeding supports adoption of a two-way geographic split and Staff Recommendations in Findings of Fact No. 58 are reasonable, fair and equitable and therefore in the public interest.

ORDER

THEREFORE, IT IS ORDERED that the two-way geographic split with the existing 520 rate centers within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA is hereby adopted.

IT IS FURTHER ORDERED that the permissive dialing shall commence June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002 and activation of the relief code occur March 9, 2002.

IT IS FURTHER ORDERED that the Industry develop a comprehensive customer education program and that the costs of such customer education programs be paid by all telecommunications service providers based upon the number of NXX codes they control.

...
...

SERVICE LIST FOR: GENERIC INVESTIGATION ON INDUSTRY PETITION FOR
APPROVAL OF AN NPA RELIEF PLAN FOR THE 520 NPA

DOCKET NO. T-00000F-99-0641

Joe Cocke
Senior NPA Relief Planner, Western Region
NeuStar, Inc.
1445 E. Los Angeles Avenue, Suite 301-N
Simi Valley, CA 93065

Regulatory Contact
Accipiter Communications
Post Office Box 11929
Glendale, AZ 85318

ACSI Local Switched Services, Inc., dba e-spire
133 National Business Parkway, Suite 100
Annapolis Junction, MD 20701

Robert W. McCausland
Allegiance Telecom of Arizona, Inc.
1950 Stemmons Freeway
Suite 3026
Dallas, TX 75207-3118

Alltel Communications
2125 East Adams Street
Phoenix, AZ 85034

Arch Paging, Inc.
1800 West Park Drive, Suite 250
Westborough, MA 01581-3926

Richard S. Wolters
AT&T Communications of the Mountain States, Inc.
1875 Lawrence St., Suite 1575
Denver, CO 80202

Cindy Manheim
AT&T Wireless Services
7277 164th Avenue North East
Redmond, WA 98052

Mark J. Trierweiler
Government Affairs Vice President
AT&T
1875 Lawrence Street, Suite 15-22
Denver, CO 80202
John D. Love

- 1 Brooks Fiber Communications of Tucson
- 2 177 North Church Street
- 3 Predidio Suites
- 4 Tucson, AZ 85701

- 5 Tim Rogers
- 6 CapRock Communications Corp.
- 7 15601 North Dallas Parkway
- 8 Suite 700
- 9 Dallas, TX 75248

- 10 CenturyTel Service Group
- 11 805 Broadway
- 12 Vancouver, WA 9860-3277

- 13 Curt Huttzell, Ph.D.
- 14 Director, State Government Affairs
- 15 Citizens Communications
- 16 9672 South 700 East, Suite 101
- 17 Sandy, UT 84070-3555

- 18 Copper Valley Telephone, Inc.
- 19 P.O. box 970
- 20 Willcox, AZ 85644

- 21 Bradley S. Carroll
- 22 Cox Communications
- 23 1550 west Deer Valley Road
- 24 Phoenix, AZ 85027

- 25 Dobson Cellular Systems
- 26 13439 North Broadway Extension
- 27 Oklahoma City, OK 73114

- 28 Penny Bewick
- Electric Lightwave Inc.
- 4400 NE 77th Avenue
- Vancouver, WA 98662

- Regulatory Contact
- Eschelon Telecom of Arizona
- 730 Second Avenue South, Suite 410
- Minneapolis, MN 55402

1 Cathy Murray
 1 Manager, State Regulatory Group
 2 Frontier Local Services - AZ
 2 1221 Nicollette Mall, suite 300
 3 Minneapolis, MN 55403

4 Regulatory Contact
 4 Gila River Telecommunications, Inc.
 5 7065 West Allison
 6 Chandler, AZ 85226

7 Gary Yaquinto
 7 Director, Government Affairs
 8 GST Net - AZ
 9 GST Telecom
 9 One Arizona Center
 10 400 East Van Buren, Suite 350
 11 Phoenix, AZ 58004

12 Wayne Mark
 12 Handy Page
 13 841 West Fairmount, Suite 5
 14 Tempe, AZ 85282

15 Regulatory Contact
 15 Intermedia Communications, Inc.
 16 3625 Queen Palm Drive
 17 Tampa, FL 33619-1309

18 Level 3 Communications
 18 1025 Eldorado Boulevard
 19 Broomfield, CO 80021

20 Thomas F. Dixon
 21 MCI WorldCom, Inc.
 21 707 17th Street, Suite 3900
 22 Denver, CO 80202

23 Regulatory Contact
 23 MetroCall, Inc.
 24 6910 Richmond Hwy
 25 Alexandria, VA 22306

26 Midvale Telephone Exchange, Inc.
 26 P.O. Box 7
 27 2205 Keithley Creek Road
 28 Midvale, ID 83645

- 1 Thomas Carter
- 2 Mohave Wireless
- 3 3707 Stockton Hill Road, Suite B
- 4 Kingman, AZ 86401
- 5
- 6 Mountain Telecommunications, Inc.
- 7 10190 East McKellips Road
- 8 Scottsdale, AZ 85256
- 9
- 10 Regulatory Contact
- 11 Nationwide Paging, Inc.
- 12 2313 West Burbank Blvd
- 13 Burbank, CA 91506
- 14
- 15 James F. Kenefick
- 16 Net-tel Corporation
- 17 11921 Freedom Drive, Suite 550
- 18 Reston, VA 20190
- 19
- 20 Regulatory Contact
- 21 Network Services, L.L.C.
- 22 525 South Douglas St.
- 23 El Segundo, CA 90245
- 24
- 25 Nextel Communications, Inc.
- 26 2003 Edmund Halley Drive
- 27 Reston, VA 20191
- 28
- 17 Todd Lesser
- 18 North County Telecommunications
- 19 3802 Rosencrans, Suite 485
- 20 San Diego, CA 92110
- 21
- 22 Richard P. Kolb
- 23 OnePoint Communications -- Colorado
- 24 Two Conway Park
- 25 150 Field Drive, Suite 300
- 26 Lake Forest, IL 60045
- 27
- 28 Regulatory Contact
- 29 Optel (Arizona) Telecom, Inc.
- 30 1111 West Mockingbird Ln
- 31 Suite 1000
- 32 Dallas, TX 75247
- 33
- 34
- 35
- 36
- 37
- 38

- 1 Jeff Webster
Pac-West Telecomm, Inc.
1776 March Lane, Suite 250
Stockton, CA 95207
- 3 Jeff Hayes
4 Pagenet
5 2525 East Camelback Road, Suite 1000
Phoenix, AZ 85254
- 6 Terrence Peck
7 Prism Arizona Operations, LLC
1667 K Street, NW, Suite 200
8 Washington, DC 20006
- 9 Rio Virgin Telephone Company, Inc.
10 P.O. Box 189
Estacada, OR 97023
- 11 San Carlos Apache Telecommunications
12 P.O. Box 158
13 10 Tonto Street
San Carlos, AZ 85550
- 14 Richard Watkins
15 Smith Bagley, Inc. dba Cellular One of NE Arizona
16 1500 South White Mountain Road
Show Low, AZ 85901
- 17 South Central Utah Telephone Association, Inc.
18 P.O. Box 226
19 Escalante, UT 84726
- 20 Donald Low
21 Sprint Communications, L.P.
8140 Ward Parkway, 5E
22 Kansas city, MO 64114
- 23 John Hayes
24 Table Top Telephone Company, Inc.
600 N. Second Avenue
25 Ajo, AZ 85321
- 26 Manager External Relations
TDS Telecom (dba Arizona Telephone, Southwestern Telephone)
27 2495 North Main Street
P.O. Box 220
28 Choctaw, OK 73020-0220

- 1 Jennifer Seeger-Martin
- 2 Teligent Services, Inc.
- 3 8065 Leesburg Pike
- 4 Suite 400
- 5 Vienna, VA 22182

- 6 Tohono O'odham Utility Authority
- 7 P.O. Box 816
- 8 Sells, AZ 85634

- 9 Regulatory Contact
- 10 Touch Tone Interactive
- 11 5020 North 7th Street
- 12 Phoenix, AZ 85014

- 13 Valley Telecommunications Company
- 14 P.O. Box 1099
- 15 Willcox, AZ 85644

- 16 Valley Telephone Cooperative, Inc.
- 17 P.O. Box 970
- 18 Willcox, AZ 85643

- 19 Andrea Cooper
- 20 Numbering Director
- 21 Verizon Wireless
- 22 2785 Mitchell Drive, MS7-1
- 23 Walnut Creek, CA 94598

- 24 Shirley Smith
- 25 Voice Stream Wireless
- 26 2601 West Broadway
- 27 Tempe, AZ 85282

- 28 Regulatory Contact
- Winstar Wireless of Arizona
- 1577 Spring Hill Road, #600
- Vienna, VA 22182

- Susan Brenton
- Arizona Burglar and Fire Alarm Assoc.
- 2334 S. McClintock Drive
- Tempe, AZ 85282

1 Raymond Heyman
 2 Roshka, Heyman & DeWulf
 3 400 North 5th Street
 4 Phoenix, AZ 85004
 5 Attorney for Arizona Payphone Association

6 Thomas Campbell
 7 Lewis and Roca
 8 40 North Central Avenue
 9 Phoenix, AZ 85004-4429

10 Jeffrey Crockett
 11 Snell & Wilmer
 12 One Arizona Center
 13 Phoenix, Arizona 85001

14 Richard Sallquist
 15 Sallquist & Drummond
 16 2525 East Arizona Biltmore Circle
 17 Suite 117
 18 Phoenix, Arizona 85016

19 Timothy Berg
 20 Fennemore Craig, P.C.
 21 3003 North Central Ave., Suite 2600
 22 Phoenix, AZ 85012

23 Michael M. Grant
 24 Gallagher & Kennedy
 25 2575 East Camelback Road
 26 Phoenix, AZ 85016-9225

27 Michael W. Patten
 28 Brown & Bain, P.A.
 29 2901 North Central Ave., Suite 2000
 30 P.O. Box 400
 31 Phoenix, AZ 85001-0400

32 Thomas L. Mumaw
 33 Snell & Wilmer
 34 One Arizona Center
 35 400 East Van Buren
 36 Phoenix, AZ 85004

37
 38
 39
 40

1 Deborah Scott
2 Director - Utilities Division
3 Arizona Corporation Commission
4 1200 West Washington Street
5 Phoenix, AZ 85007

6 Christopher Kempley
7 Chief Legal Counsel
8 Arizona Corporation Commission
9 1200 West Washington Street
10 Phoenix, AZ 85007

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28