

The Commission received three Consumer Statements of Position, as follows: on March 26, 2021, by Ms. Elizabeth L. Acevedo; on April 1, 2021, by Ms. Susan Foster; and on April 9, 2021, by Ms. Cheryl Pasquariello.

THE PETITION

The NANPA maintained that in accordance with industry guidelines, only an all-services distributed overlay will meet the requirements for relief of the 910 NPA, which is scheduled to transition to mandatory 10-digit dialing due to the national implementation of 988 as the three-digit abbreviated dialing code to reach the national suicide prevention and mental health crisis lifeline as ordered by the FCC.² The NANPA stated that the Industry requests that the Commission expeditiously approve the Industry's plan to implement the all-services distributed overlay as set forth in the Petition.

The NANPA noted that the Industry recommends that it implement the new NPA based upon a nine-month schedule, after mandatory 10-digit dialing has been implemented in the 910 NPA. The NANPA stated that adhering to this Industry agreed-upon schedule will allow the new NPA to be implemented six months before the projected exhaust of the 910 NPA, while allowing the Industry to complete the 10-digit dialing implementation before starting the implementation of the new NPA.

Background and Procedural History

The NANPA noted in the Petition that the 910 NPA covers the southeastern area of North Carolina including cities such as Fayetteville, Wilmington, and Jacksonville. The NANPA stated that the 910 NPA was created when the 919 NPA was split in 1993.

The NANPA commented that as required by the FCC, it collects area code and CO code assignment and utilization data, develops projected demand for numbering resources, and publishes the projected exhaust of each area code twice a year. The NANPA noted that in October 2020 it published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (October 2020 NRUF Report) which indicated that the 910 NPA will exhaust during the second quarter of 2023.³

The NANPA noted that because the 910 NPA is within 36 months of projected exhaust, NANPA convened an Industry relief meeting via web conference on

² See NANPA Planning Letter 544 published on the NANPA website at https://www.nationalnanpa.com/pdf/PL_544.pdf.

³ The NANPA referenced the October 2020 NRUF and NPA Exhaust Analysis (October 2020 NRUF Report) which can be accessed on the NANPA web site at <https://www.nanpa.com>.

November 12, 2020.⁴ The NANPA stated that before the meeting, it distributed an initial planning document (IPD) to the Industry containing three relief alternatives for the Industry's consideration.

The NANPA maintained that subsequently, but before the Industry met on November 12, 2020 to reach a decision on its recommendation for relief, the NPA Relief Planning Guidelines were amended to state that "where NPA relief is required for a single NPA area and . . . the NPA is scheduled to transition to 10-digit dialing . . . the [IPD], relief planning meeting, and industry consensus to recommend an overlay is not required." (See NPA Relief Planning Guidelines at §5.6.2.)

The NANPA noted that the 910 NPA is scheduled to transition to mandatory 10-digit dialing by July 15, 2022 as a result of the FCC's Order approving the designation of 988 as the three-digit abbreviated dialing code for the national suicide prevention and mental health crisis lifeline. (See Implementation of the National Suicide Hotline Improvement Act of 2018, Report and Order, FCC 20100 (rel. July 17, 2020)).

The NANPA explained that due to the change to the NPA Relief Planning Guidelines, the only option for the Industry's recommendation for relief of the 910 NPA is an all-services distributed overlay. The NANPA stated that, therefore, the Industry reached consensus to recommend to the Commission that it issue an order approving the all-services distributed overlay as the form of relief for the 910 NPA. The NANPA noted that the Industry also established, by consensus, a relief implementation schedule which includes flexible timeframes so that the Industry can accommodate holidays, high traffic days and implementation dates for other NPA relief activities occurring in other parts of the country.

The NANPA attached a copy of the November 12, 2020 meeting minutes as Exhibit A to its Petition; Exhibit A also includes the Industry's proposed customer education plan and technical milestones. The NANPA also included a copy of the IPD as Exhibit B to its Petition.

Proposed All-Services Distributed Overlay Relief for the 910 NPA

The NANPA noted that the all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 910 NPA and is projected to last approximately 48 years. The NANPA explained that it would not assign

⁴ The NANPA noted that in order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Oct. 23, 2020) (NPA Relief Planning Guidelines). The NANPA maintained that 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 NANPA noted that the NPA Relief Planning Guidelines can be accessed on the ATIS website located at https://www.atis.org/01_committ_forums/inc/documents/. The NANPA noted that it is responsible for initiating area code relief in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically 36 months prior to exhaust. NPA Relief Planning Guidelines at §5.0.

CO codes from the new overlay NPA until all assignable CO codes from the 910 NPA are exhausted.

Further, the NANPA maintained that all existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. The NANPA further noted that the implementation of an all-services distributed overlay requires mandatory 10-digit dialing for local calls, including calls within the same NPA; however, the 910 NPA already will be transitioned to mandatory 10-digit dialing because of the national implementation of 988 to reach the national suicide prevention and mental health crisis lifeline, and the Industry-recommended dialing plan set forth in the following table is consistent with that implementation.

Dialing Plan for the All-Services Distributed Overlay

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA) (including Extended Area Service (EAS) calls)	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 permissive dialing at service provider discretion.*

The NANPA noted that the Industry reached consensus to implement relief in accordance with a nine-month schedule, which would start after mandatory 10-digit dialing has been implemented in the 910 NPA. The NANPA maintained that the schedule does not include specific dates, but rather timeframes to identify the phases of implementation. The NANPA asserted that once the Commission has approved the instant Petition, the Industry will select specific dates at an implementation meeting to ensure the dates do not interfere with holidays, high traffic calling days, or other NPA relief implementation activities occurring across the country.

The NANPA further maintained that an expeditious approval of the instant Petition and adherence to the proposed implementation schedule will prevent the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes. The NANPA stated that the Industry-agreed upon implementation schedule is set forth in the table below. The NANPA noted that there is no requirement for a permissive dialing period because it is expected that mandatory 10-digit dialing will already be implemented by the time the nine-month implementation schedule begins.

Implementation Schedule for an All-Services Distributed Overlay

EVENT	TIMEFRAME
Customer Education and Network Preparation Period	Eight months
Effective date of the new NPA	One Month after the completion of Customer Education and Network Preparation Period

In conclusion, the NANPA stated that in the event there is no opposition to the Petition, the Industry requests that the Petition be granted expeditiously without a hearing or further filings or proceedings. The NANPA noted that to the extent there is opposition, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments.

Further, the NANPA maintained that once the Commission has granted the Petition, the Industry will implement an all-services distributed overlay covering the 910 NPA in accordance with the implementation schedule set forth in the Petition. The NANPA commented that the Industry requests that the Commission grant the Petition by no later than October 1, 2021.

INITIAL COMMENTS

The Public Staff filed a letter in lieu of comments. The Public Staff stated that it has reviewed the Petition and believes that the proposed all-services distributed overlay for the 910 NPA, as well as the implementation schedule, is in the public interest. Therefore, the Public Staff recommended that the Commission issue an order granting the Petition as filed.

REPLY COMMENTS

No party filed any reply comments.

CONSUMER STATEMENTS OF POSITION

The Commission notes that all three of the Consumer Statements of Position filed in this docket expressed concern over having to change their telephone numbers with the implementation of an all-services distributed overlay. The Commission specifies that no customers with existing 910 area code telephone numbers will have to change their existing telephone number with the implementation of an all-services distributed overlay. As numbers in the 910 area code run out, new telephone numbers will be assigned with the new area code.

CONCLUSIONS

After careful consideration of the filings made in this proceeding, the Commission concludes that it is appropriate to grant the Industry's Petition for an all-services

distributed overlay as the appropriate NPA relief plan for the 910 area code. As noted in the Petition, in accordance with industry guidelines, only an all-services distributed overlay will meet the requirements for relief of the 910 NPA, which is scheduled to transition to mandatory 10-digit dialing due to the national implementation of 988 as the three-digit abbreviated dialing code to reach the national suicide prevention and mental health crisis lifeline as ordered by the FCC. The Commission takes note of the important fact that, as stated in the Petition, all existing customers will retain their current area code in the overlay area and will not have to change their telephone numbers; this fact addresses the concerns raised in all of the Consumer Statements of Position filed in this docket. The Commission further notes that NANPA has stated that once the Commission has approved the instant Petition, the Industry will select specific dates at an implementation meeting to ensure the dates do not interfere with holidays, high traffic calling days, or other NPA relief implementation activities occurring across the country.

Further, the Commission notes that the implementation schedule outlined in the Petition states that there will be an eight month Customer Education and Network Preparation Period. The Commission is especially interested in the customer education efforts that the telecommunications carriers operating in the 910 NPA will employ. Therefore, the Commission requests that the Industry file quarterly reports with the Commission detailing the implementation of the new overlay in the 910 NPA. The first report should be filed by September 30, 2021 and the last report should be filed 30 days after the new area code is placed in service. The format and details of each report are at the discretion of the Industry. However, the Commission is interested in monitoring the activities and staying informed on any issues related to the new NPA, and especially on the customer education efforts that the Industry will utilize.

The Commission observes that the only significant implementation issue from the prior 919/984 area code overlay occurred when some customers dialed 911 instead of 919 when mandatory 10-digit dialing was implemented. The Commission requests that the Industry give particular emphasis to this potential issue through its customer education efforts, although in this instance 10-digit dialing will be mandatory before implementation of the new area code.

Finally, the Commission notes that it remains committed to conservation of numbering resources through the use of thousands-block number pooling in the 910 NPA.

IT IS, THEREFORE, ORDERED as follows:

1. That the Industry Petition for area code relief is hereby granted and, therefore, an all-services distributed overlay is hereby adopted to provide relief for the current 910 area code in North Carolina;
2. That the schedule for implementation of the all-services distributed overlay in the 910 area code will be as described in the Industry Petition; and

3. That the Industry shall file quarterly reports with the Commission detailing the implementation of the new overlay in the 910 NPA. The first report should be filed by September 30, 2021 and the last report should be filed 30 days after the new area code is placed in service. The format and details of each report are at the discretion of the Industry. However, the Commission is interested in monitoring the activities and staying informed on any issues related to the new NPA, and especially on the customer education efforts that the Industry will utilize.

ISSUED BY ORDER OF THE COMMISSION.

This the 25th day of June, 2021.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in cursive script that reads "Lindsey A. Worley".

Lindsey A. Worley, Acting Deputy Clerk