BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



02/20/25 08:00 AM

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Application of the North American)	A250200
Numbering Plan Administrator, on)	
behalf of the California) Docket No	
Telecommunications Industry, for)	
Relief of the 626 Numbering Plan Area)	

APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY FOR RELIEF OF THE 626 NUMBERING PLAN AREA

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Dated: February 20, 2025

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY FOR RELIEF OF THE 626 NUMBERING PLAN AREA

The North American Numbering Plan Administrator ("NANPA"), as the neutral national third-party Numbering Plan Area ("NPA") (also referred to as "area code") relief planner and on behalf of the California telecommunications industry ("Industry"),¹ hereby notifies the California Public Utilities Commission ("Commission")² that the 626 NPA is projected to exhaust its Central Office codes (often referred to as "CO" or "NXX" codes) during the fourth quarter of 2027. This means that absent approval of an NPA relief plan, the supply of CO codes in the 626 NPA is projected to run out during the projected exhaust quarter.

In accordance with the NPA Code Relief Planning and Notifications Guidelines ("NPA Relief Guidelines") only an overlay will meet requirements for relief of the 626

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 626 NPA.

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

NPA.³ The 626 NPA has been in mandatory 1+10-digit local dialing since July 15, 2022.⁴ In the case of an NPA where dialing 1+10-digits for local calls is already required, such as the 626 NPA, the NPA Relief Guidelines state that when "NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing, then the IPD, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing shall include the state's existing overlay dialing plan."⁵

The Industry recommends the new all-services distributed overlay NPA for the 626 NPA be implemented based upon a nine (9)-month schedule. Adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six (6) months prior to the projected exhaust of the 626 NPA.⁶ The Industry respectfully requests that the Commission expeditiously approve the Industry's plan and issue its final decision to implement the overlay as set forth herein, no later than February 28, 2026.

³ NANPA reviews all possible relief alternatives per NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, October 28, 2024) ("NPA Relief Guidelines"), §5. The NPA Relief Guidelines can be accessed on the ATIS website located at

https://access.atis.org/higherlogic/ws/public/document?document_id=78768

⁴ See NANPA Planning Letter 556 published on the NANPA website at https://www.nanpa.com/sites/default/files/planning_letters/PL-556.pdf

⁵ NPA Relief Guidelines at §5.6.3.

⁶ NPA Relief Guidelines at §7.2.

Prompt approval of the Industry's plan will provide the Industry with the necessary time to prepare for the implementation and provide NANPA with the 75 calendar days needed to assign a new NPA, ensure a press release is issued to announce the new NPA, schedule and facilitate an implementation meeting, and publish the Planning Letter(s).⁷

I. Background

The 626 NPA was created in 1997 through a geographic split of the 818 NPA. In 1999, NANPA initiated relief planning for the 626 NPA. In September 1999, the Commission instituted a rationing and lottery allocation plan for the 626 NPA that permitted up to five (5) CO codes to be assigned monthly. NANPA implemented thousands-block number pooling, a number conservation method, in May 2002. The Commission maintained rationing in the 626 NPA until September 20, 2010. These measures delayed the need to introduce a new area code in the 626 geographic area until now.

The 626 NPA encompasses a large portion of the San Gabriel Valley containing the eastern portion of Los Angeles County, and serves communities including but not limited to Alhambra, Altadena, Arcadia, Azusa, Baldwin Park, Covina, El Monte, Glendora, La Puente, and Pasadena.

The 626 NPA is bordered to the north by the 661 NPA, to the east by the 442/760 and 840/909 NPAs, to the south by the 562 and 657/714 NPAs, and to the west by the 213/323/738 and 747/818 NPAs. Mandatory 1+10-digit dialing is required in all of the bordering NPAs except the 661 NPA.

⁷ NPA Relief Guidelines at §5.10.1.

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the results twice a year. According to the October 2024 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2024 NRUF Report"), published by NANPA, the 626 NPA is projected to exhaust its supply of CO codes during the fourth quarter of 2027.8

NANPA distributed a notice to the Industry on December 19, 2024,9 for a meeting to review a draft application. The Industry met on January 9, 2025, and reached consensus on the instant Application seeking Commission approval for an all-services distributed overlay. The all-services distributed overlay meets Industry guidelines for an NPA with 1+10-digit local dialing already in place.¹⁰

II. Description of the Relief Plan and Public Education Plan

The all-services distributed overlay will superimpose a new NPA over the same geographic area covered by the 626 NPA. NANPA will assign CO codes from the new overlay NPA once all assignable CO codes from the 626 NPA are allocated. All existing customers will retain their current area code in the overlay area and will not have to change their telephone numbers. The addition of the new NPA over the 626 geographic area is projected to last approximately 33 years.

⁸ The October 2024 NRUF and NPA Exhaust Analysis ("October 2024 NRUF Report") can be accessed on the NANPA web site at https://www.nanpa.com/reports/npa-reports.

⁹ NANPA's December 19, 2024, notice to the Industry is attached as Exhibit A and contains CO code assignment information, thousands-block pooling statistics, and associated maps.

¹⁰ A copy of the January 9, 2025, final meeting minutes is attached as Exhibit B.

The new NPA will follow the current dialing plan for the 626 NPA:

Current Dialing Plan for the 626 NPA

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	1+10 digits (1+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)

^{*10-}digit dialing permissible at wireless providers' discretion

The Industry reached consensus to implement the new relief NPA in accordance with a nine (9)-month schedule which is the typical timeframe the Industry uses to implement an overlay when 1+10-digit local dialing is already in place. The schedule, outlined below, does not include specific dates, but rather timeframes to identify the phases of implementation including customer education and technical milestones. Once the Commission approves the instant Application, the Industry will select specific dates at an initial implementation meeting to ensure the dates do not interfere with certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission's prompt approval of the instant Application and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes. There is no requirement for a permissive dialing period because mandatory 1+10-digit local dialing has been in place in the 626 NPA since July 2022. As customer education for this overlay implementation involves no dialing changes and 626 NPA customers are already familiar with 1+10-digit local dialing, only an informational notification will be needed

for the new NPA.¹¹ Thus, there is no need for paid advertising to educate the public about the new NPA.¹²

The Implementation Timeframe Schedule for the 626 All-Services Distributed Overlay

Event	Timeframe	
Customer Education and Network	Implementation Start Date selected by the	
Preparation Period Begins*	Industry	
Effective Date of CO codes in the	9 months after the Implementation Start	
new NPA **	Date selected by the Industry	
	Six (6) months prior to exhaust	

^{*} There is no requirement for a permissive dialing period because mandatory 1+10-digit local dialing is already in place.

After the Commission has issued a final decision approving the Industry's Application, the Industry implementation Committee will meet approximately 15 months prior to exhaust of the 626 NPA to implement the new area code. ¹³

Customer Education/Public Education Plan ("PEP")

Following is the Industry's recommended Customer Education/Public Education Plan ("PEP") which is based on the Commission's approved "PEP" in the 530 NPA overlay project with a modification made for the 626 NPA.

https://www.nanpa.com/numbering/abbreviated-codes

^{**}CO codes in the new NPA will not be assigned until all assignable CO codes in the existing 626 NPA are allocated.

¹¹ Under the transition plan for the implementation of the abbreviated code for the national 988 Suicide and Crisis Lifeline, 626 NPA customers were educated that mandatory 1+10-digit local dialing became effective on October 24, 2021. Service providers removed 7-digit local dialing in the 626 NPA from their networks by July 15, 2022. See the customer education materials on the NANPA website at:

¹² See Attachment #1, Industry Statement for the Record, All-Service Overlay for the 626 NPA.

¹³ A total of 18 months is needed to accommodate NANPA's administrative processes, and to complete a nine (9)-month implementation schedule at least six (6) months prior to the exhaust of the 626 NPA.

Public Education Plan for 626 Area Code Relief (CPUC staff may grant amendments as needed during implementation)

Activity	y Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
1	Effective date of decision approving 626 area code overlay	NA	NA	Date of Decision (DOD)		DOD should be no later than 2/28/2026. Industry will then select an Implementation Start Date that is no later than 7/1/2026.
2	Post-Commission meeting news release announcing the 626 area code overlay relief plan, and the new overlay area code. Post CPUC news release to CPUC website and social media platforms.	All customers	CPUC	DOD		The CPUC will issue a News Release similar to the CA 530 Overlay which was issued 6/8/2023: https://www.cpuc.ca.gov/ne ws-and-updates/all- news/cpuc-provides-more- numbers-for-530-area-code- 2023
3	NANPA 626 implementation meeting, and request for industry participation on PEP task force and subcommittees. Determination of Implementation Start Date (ISD)	CPUC Staff and Industry	CPUC staff and industry	3-6 weeks after DOD		The NPA Relief Planning Guidelines require NANPA to hold this meeting within 6 weeks of the DOD. The Implementation Start Date (ISD) will be selected by the Industry at this meeting.
4	Implementation Start Date (ISD) – Start Implementation	Industry	Industry			No later than 7/1/2026
5	First news release announcing the 626 area code relief plan, the 626 area code geographic boundaries, and the new overlay area code for issue within the 626 area code and adjacent area codes, to media and key entities, including chamber of commerce and local governments. Post new release to CPUC website and social media platforms.	All customers	Industry and CPUC staff	1 month after ISD		No permissive dialing period is needed because customers will have already been educated by 07/2022 and mandatory 1+10-digit dialing implemented due to the 988 implementation. See the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes.
6	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 626 area code overlay.	CPUC staff	Industry	2 months after ISD		
7	626 overlay information	Customer service	Individual service	2 months after ISD		

	distributed internally as job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	representatives	providers		
8	Provide by email targeted letters with the information in Customer Notification , along with PEP Task Force contact information, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm service providers, (3) public safety organizations and PSAPs, providers, (4) telephone directory publishers, and (5) California Relay Services throughout the 626 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/ activist organizations, chambers of commerce, city councils and other key government agencies, alarm service providers, public safety organizations and PSAPs, telephone directory publishers, and California Relay Services	Industry	2 months after ISD	Entities stricken here are those that need education when mandatory 1+10-digit dialing is implemented, but not here when such education and mandatory 1+10-digit dialing has already been implemented due to the 988 implementation. See the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes.
9	626 area code overlay update to industry websites.	All customers	Individual service providers	3 months after ISD	
10	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 626 area code overlay.	CPUC staff	Industry	5 months after ISD	
11	Second news release reminding the public of the 626 area code plan, the 626-area code geographic boundaries, and the new overlay area code for issue within the 626 area code and adjacent area codes. Post CPUC new release to CPUC	All customers	CPUC staff and industry	8.5 months after ISD	Mandatory 1+10-digit dialing has already been implemented by 07/15/2022 due to the 988 implementation. See Milestones #33 in the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes. This news release is just a

	website and social media platforms				reminder of the new overlay area code effective date.
12	Published Directories: Add information on cover to alert 626 area code customers about the new overlay area code	All customers	Individual service providers	9 months after ISD	
13	Single customer notification runs for two bill cycles. Announce the 626 area code overlay, indicate the affected areas, and the new area code effective date.	All customers	Individual service providers	9 months after ISD	Customer notice to run two months (2 bill cycles requirement)
14	New NPA/Area Code assigned and implementation completed			9 months after ISD	New overlay area code becomes effective 9 months after the ISD selected by the Industry.
15	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including local broadcast television stations) of the 626 area code overlay.	CPUC staff	Industry	9.5 months after ISD	Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes.

Following are technical milestones the Industry utilizes in California for implementation of a new overlay NPA when mandatory 1+10-digit local dialing is already in place; however, these may be modified by agreement of the Industry members during the actual implementation of the new NPA.

Technical Milestones

	Technical Milestones	Responsibility
1	Obtain industry test code from NANPA and activate the test number	One Service Provider Volunteer
2	Open the test code in carriers' network	All Service Providers
3	Establish NPA Specific type of Trunks	All Service Providers (if not already in place)
	E911 Work Plan	
4	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA if needed	E911 Providers
5	Ensure SRDB table has been updated with the new NPA	E911 Providers
6	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers

7	Notify Statewide 911 Coordinator	Industry Co-chairs
8	Review and submit CLEC trunk order requests to local	All Service Providers (as needed)
	provider if needed	, , , , , , , , , , , , , , , , , , ,
9	Update PSAP equipment to recognize new NPA	PSAP's
10	Trunk orders complete	E911 Providers
11	Build E911 Network/Tandem Translations	E911 Providers
12	Verify if all PSAP work has been completed	PSAP's
13	Activate E911 Network/Tandem Translations	All Service Providers

III. Conclusion

Consumers are already accustomed to the primary characteristics of an all-services distributed overlay in the 626 NPA area as the requirement for 1+10-digit local dialing has been in place since July 2022. The Industry requests that the Commission issue a decision granting the instant Application approving an all-services distributed overlay of the 626 NPA and the recommended implementation schedule for relief of the 626 NPA without a hearing. In recent Commission NPA relief proceedings, the Commission agreed to forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted the instant Application, the Industry will implement an all-services distributed overlay over the 626 NPA in accordance with the implementation schedule set forth above.

As such, the Industry requests that the Commission issue a final decision granting the instant Application no later than February 28, 2026.

Respectfully submitted,

Kimberly Wheeler Miller

Kimberly Miller

Counselfor

North American Numbering Plan

Administrator

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February 20, 2025

VERIFICATION

I, Florence Weber, hereby state the following under penalty of perjury. I am Vice

President of the North American Numbering Plan Administrator and authorized to

make this verification on behalf of the North American Numbering Plan Administrator.

I have read the foregoing "Application of the North American Numbering Plan

Administrator, on behalf of the California Telecommunications Industry, for relief of the

626 Numbering Plan Area" ("Application"). To the best of my personal knowledge,

except as to the matters which are therein stated on information or belief, based on

personal information and communications with and information provided by

appropriate NANPA personnel, I believe the facts stated in the Application to be true

and correct.

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Date: February 20, 2025

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Attachment #1 Industry Statement for the Record

All-Service Overlay for the 626 NPA

The Industry respectfully requests that the Commission approve the industry's Application to implement an all-services distributed overlay for relief of the 626 area code, including its proposed implementation interval and Public Education Plan (PEP), no later than February 28, 2026. The Industry's proposed schedule and PEP allow the Industry to implement relief efficiently, avoid holiday network freeze timeframes, avoid other overlay relief implementation dates across the country, and reduce the risk of running out of 626 numbers before relief is implemented.

The Industry will work together to ensure the overlay implementation is successful. No paid advertising is necessary for a successful implementation because:

- Mandatory 1+10-digit dialing has been in place in the 626 area code since July 2022, so there is no need for a permissive dialing period or customer education about 1+10-digit dialing.
- Educating 626 customers about the new overlay area code is just an informational exercise. Californians are
 already extremely familiar with multiple area codes and mandatory 1+10-digit dialing. Mandatory 1+10-digit
 dialing is the predominant dialing plan in California, required in all but two area codes by the time this overlay
 is implemented.
- The Industry is quite experienced in educating customers about the introduction of new overlay area codes when mandatory 10-digit or 1+10-digit dialing is already in place. By the time implementation for this overlay will need to start, the Industry will have implemented at least four such overlays in California, with no paid advertising being used.
 - The Industry has already implemented similar overlays in Arizona, Colorado, Florida, Georgia, Illinois, Maryland, Missouri, New York, North Carolina, Ohio, Pennsylvania, Texas, Virginia, Washington and Wisconsin. No paid advertising was used in any of those.
 - The Industry has implemented more than 60 overlays across the United States in the last ten years, and none other than six overlays implemented in California used paid advertising. Further, no more than two news releases were issued in any of those implementations either, except for the four most recent overlays implemented in California.
- Paid advertising requirements in PEPs create the need for a funding mechanism, and past PEPs demonstrate
 that the funding mechanism is a burdensome, inefficient and unnecessarily complex process shouldered
 unfairly by a few industry volunteers.
- For the 626 overlay with its simple informational messaging about the new overlay area code, paid advertising and a funded PEP doesn't make fiscal sense. It would be virtually impossible to implement a funded PEP within the recommended 9-month implementation schedule.

In the four most recent overlays implemented in California, the Commission has required three news releases, in addition to the news release the Commission issued on the date of decision. A total of four news releases is excessive and media interest tends to wane with each successive release. The industry recommends that no more than one news release, in addition to the Commission's date of decision news release, be issued.

ATTACHMENT 2

COMPLIANCE WITH RULE 2.1(c)

In compliance with Rule 2.1(c) of the Commission's Rules of Practice and Procedure, the North American Numbering Plan Administrator, in its role as the neutral third-party NPA Relief Planner for California under the North American Numbering Plan and on behalf of the California telecommunications industry ("Industry"), provides the following information:

Proposed Category: The Application should be categorized as a rate setting proceeding according to Rule 7.1(e)(2)which states in part "[w]hen a proceeding does not clearly fit into any of the categories as defined in Rules 1.3(a), (d), and (e), the proceeding will be conducted under the rules applicable to the rate setting category" unless otherwise determined by the Commission.

Need for Hearings: The Application does not raise any material issues of fact. Further, as explained in the Application in Exhibit B, a recorded webcast regarding the Industry's proposed relief plan will be made available on the California Public Utilities Commission's website on May 13, 2025. Accordingly, hearings are not necessary.

Issues to be Considered: Whether the Commission should adopt the Industry's recommended all-services distributed overlay with a corresponding nine (9)-month implementation schedule, and the Industry's recommended Public Education Plan ("PEP") as the preferred form of relief for the 626 numbering plan area ("NPA").

Proposed Schedule: NANPA projects that the 626 NPA will exhaust during the fourth quarter of 2027. As explained in the Application, the Industry recommends a nine (9)-month schedule to implement the all-services overlay. To ensure the Industry

has sufficient time to implement relief before the 626 NPA exhausts, the following schedule is proposed:

Application Filed: February 20, 2025

Expiration of Protest Period: June 13, 2025

Final Decision Issued: February 28, 2026

EXHIBIT A



December 19, 2024

To: All 626 NPA Code Holders, Block Holders and Interested Industry Members (California)

Subject: California 626 NPA Draft Application Review Meeting

The North American Numbering Plan Administrator ("NANPA") has scheduled a draft application review meeting via web conference to provide the telecommunications industry of California ("Industry") an opportunity to review and approve a draft application to be filed with the California Public Utilities Commission ("Commission") requesting approval to add a new NPA to the California 626 NPA which is projected to exhaust in the fourth quarter of 2027. As stated in the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061), Section 5.6.3 "Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing, then the IPD, relief planning meeting, and industry Consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing 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."

NANPA will convene an Industry relief planning meeting on January 9, 2025, and the Industry approved relief plan will be filed with the Commission 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.

Included with this meeting notice is an agenda, the consensus process, relief planning meeting aids, 626 NPA Central Office ("CO") Code/Thousands-Block Summary, service provider CO code assignments by OCN, draft application, and associated maps.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation in this meeting. Experience demonstrates that this could be the only meeting of the Industry before a decision is reached on the relief filing that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Thursday, January 9, 2025

Time: 10 am PT; 11 am MT; 12 pm CT; 1 pm ET

Join Zoom Meeting

https://somos.zoom.us/j/82832687994?pwd=QiAUMOK9saB9pF9MnsFY7sjKmeUscd.1&from=addon

Meeting ID: 828 3268 7994

Password: 980998

One tap mobile 8778535257,,82832687994# US Toll-free 8884754499,,82832687994# US Toll-free

Dial by your location 877 853 5257 US Toll-free 888 475 4499 US Toll-free Meeting ID: 828 3268 7994

Please feel free to distribute this notice to others in the Industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 626 NPA, you are encouraged to sign up to NANPA's NANP Administration System ("NAS") NANP Notification System ("NNS") by going to www.nanpa.com, then selecting Register and following the registration process.

If you have any questions, please contact call me (571) 363-3824 or email hwayman@nanpa.com.

Sincerely,

Heidi A. Wayman Manager, Data Management NANPA

CC: Peter Chang, California Public Utilities Commission Lina Khoury, California Public Utilities Commission Siamack Donighi, California Public Utilities Commission

California 626 NPA Draft Application Review Meeting via Web Conference

January 9, 2025 - 10:00 AM (PT)

AGENDA

Attendance / Welcome & Introductions / Consensus Definition	Attendance A	e & Introductions / C	Consensus Definitio
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NANPA's Role and Responsibilities

Review Industry Guidelines

Review 626 NPA Background, History and Status

Review of Draft Application

Consensus on Customer Education & Technical Milestones

Consensus on Implementation Intervals

Review of State Law and Public Utilities Code Requirements

Consensus on Approval & Filing

Open Discussion / Statements for the Record

Posting of Minutes

Adjourn

INDUSTRY CONSENSUS PROCESS

NOVEMBER/16/2020 Version 5.6

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 or in **Appendix A**. 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 Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

4.2.2

NANPA investigates and resolves, wherever possible, any discrepancies in the information provided.

4.2.3

Any information released by NANPA to the industry will be released only on an aggregated or summary basis (See Section 16.1.2 of the TBCOCAG, ATIS-0300119).

4.3

NANPA continually monitors and projects CO Code exhaust within NPAs in order to anticipate the need and prepare for NPA relief activity.

4.4

NANPA develops plans for NPA relief and initiates implementation efforts, in both normal and Jeopardy situations (See Section 16 of the TBCOCAG, ATIS-0300119). When the need for code relief is identified and relief activity is initiated, NANPA advises all parties affected by NPA relief activities and includes them in the planning effort.

4.5

Currently, NANPA's NPA Relief Planner submits the necessary information to the NPA Administrator who is responsible for the review and Assignment of the new NPA. This is currently an internal NANPA function.

4.6

Where necessary, NANPA presents the industry-Consensus recommended NPA relief plan to appropriate regulatory authority(ies).

4.7

NANPA and the industry jointly identify dialing plan issues within local jurisdictions at the relief planning meeting.

4.8

NANPA provides assistance to users of numbering resources and suggests alternatives, when possible, that will optimize numbering resource utilization.

4.9

NANPA prepares and issues information related to reports for special information requests and scheduled periodic reports that relate to utilization of numbering resources.

5 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:

a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one (1) relief activity, if necessary, during the time frame. If the only

- viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for CO Codes or other factors (e.g., local competition, LNP, expansion of Thousands-Block Number Pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected CO Code Assignment rates, etc. The lives of relief alternatives are based on the projected rate of Assignment of CO Codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Annex D for a summary of the relief model.
- e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.
- f) The use of Protected CO Codes is an Assignment practice whereby a CO 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 local dialing would otherwise be required). The use of Protected CO 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.²
- 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.3 Where it is suspected that Protected Routes and 7-digit dialing cross-boundary exists, NANPA shall continue the CO Code Assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the SP(s) or the appropriate regulatory authority. Any changes in Rate Centers or CO Codes that would increase or decrease Protected Routes shall be reported to NANPA by the SP initiating the change. The notification shall include the tariff, the Rate Centers and CO Codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have CO 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 CO 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 CO Codes available for Assignment can be Assigned to all Rate Centers. A high number of Protected Routes may impact the availability of CO Codes in specific Rate Centers (usually high-demand Rate Centers), which directly impacts the exhaust timeframe of an NPA. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

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 CO 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.

² Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

³ In the case of an Numbering Plan Area (NPA) overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

5.1 Determine the Expected NPA Exhaust Period

Through the use of historical growth data as well as expected changes (e.g., expansion of Thousands-Block Number Pooling) to CO Code 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 (6) months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six (6) months prior to the earliest likely exhaust date.

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA will distribute the Initial Planning Document (IPD) to the industry within four (4) weeks of the declaration of Jeopardy and will hold an industry NPA Relief Planning meeting no more than eight (8) weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is an artificial exhaust
 projection based on the monthly rationing amount determined by the industry and not reflective of the true
 need for relief.
- In cases where the NPA is in Jeopardy and CO Codes are rationed, two (2) exhaust dates will be reported: (1) the exhaust date at Jeopardy declaration, and (2) the exhaust date with controlled allocation.

5.2 Identify the Alternative Relief Methods Available

Within the affected NPA, the NANPA should next identify possible NPA relief alternatives and methods from among those identified in Section 6.

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 SPs, and industry concerns using Annex B. Specific calculations such as the relative lengths of the relief periods, and local dialing plans using 7-digits or 10-digits should be made at this point. Examples of attributes are shown in Annex 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 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 (4) 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/Conference Calls 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 consideration⁴. NANPA shall moderate these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and shall be considered in these discussions. Inasmuch as the objective of these meetings/conference calls is to reach industry Consensus, subsequent meetings/conference calls shall be held as required until Consensus is reached, or until NANPA determines Consensus cannot be reached.

5.5.1 Modifications to Previous Industry Agreements

This process provides industry participants an opportunity under prescribed circumstances to reopen and possibly modify previous agreements reached by Consensus. To be fair to all parties and cognizant of the time and effort required to reach industry Consensus, the following procedures shall be used to request a reopening of a previous Consensus agreement(s).

- At least two (2) Affected Parties are required to request the reopening and review of a Consensus agreement(s) achieved at a previous industry meeting. This excludes a previously agreed to industry NPA relief plan, regardless of whether or not that plan has been filed. The request by the parties for a reopening/review must be made in writing to the NANPA.
- At least three (3) Affected Parties are required to request the reopening of a previously agreed to industry NPA relief plan that has not been filed with the appropriate regulatory authority. The request by the parties for a reopening/review shall be made in writing to the NANPA.
- NANPA shall request a reopening of previous Consensus agreements after receiving regulatory approval when circumstances could potentially have a significant impact to the implementation plan.
- NANPA shall notify all Affected Parties at least two (2) weeks in advance that a special conference call has been scheduled. Attached to the notice will be the reasons for and description of the proposed changes. Every effort will be made to avoid conflicts with other industry meetings so that all parties may participate.
- At the beginning of the conference call, Affected Parties will consider whether the previous Consensus agreement will be reopened for discussion. If Consensus is reached to reopen the discussion, the call will proceed. Absent such a Consensus, the conference call will be adjourned.
- Only issues related to the scheduled topic will be considered on this special conference call.
- Meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

5.6 Notify Appropriate Regulatory Authority

When Consensus is reached within the industry or when NANPA determines additional meetings would not achieve Consensus, NANPA should submit to the appropriate regulatory authority 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 Relief for An Existing Overlay

Where NPA relief is required for an existing overlay complex, then the IPD, relief planning meeting, and industry Consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing 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 10-digit local dialing is already in place. The draft filing shall include the state's existing overlay dialing plan.

⁴ 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.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six (6) months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within seven (7) weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing 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 Relief For A Single NPA When An Overlay is the Only Viable Alternative

Where NPA relief is required for a single NPA area, 10-digit local dialing has not been implemented, and NANPA has determined that only an overlay alternative will meet the guidelines, then the IPD, relief planning meeting, and industry Consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing 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 three (3) weeks in advance of a conference call scheduled to review and approve the draft filing. In the notification, NANPA will include data (e.g., an NPA with a high concentration of Assigned CO Codes in one (1) 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 three (3) week timeframe notification may be necessary to allow individual industry members to fully analyze the technical, educational, and operational impacts to their respective subscribers and networks in determining the timeframes needed for implementation.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief filing. The draft filing will include a recommendation for 10-digit dialing for local⁵ calls (to either the home NPA (HNPA) and to foreign NPA(s) [FNPA]), and 1+10-digit dialing for toll calls (to either HNPA or FNPA), unless the state has an existing overlay dialing plan that is different. The recommended relief (i.e., mandatory dialing and the new NPA's in-service date) should be six (6) months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within seven (7) weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.6.3 Relief For A Single NPA When 10-Digit Local Dialing Has Been or Will Be Implemented

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing⁶, then the IPD, relief planning meeting, and industry Consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing 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 filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six (6) months prior to the forecasted exhaust (see Section

⁵ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10-digit local dialing at their discretion.

⁶ For example, FCC 20-100, ¶53.

7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within seven (7) weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.7 Approval by Appropriate Regulatory Authority

When the regulator issues an order (or other written approval) 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 (1) week of receipt of the approved plan. If the approved plan does not meet the criteria for Assignment, NANPA will suspend the Assignment pending Federal Communications Commission (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 regulators 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 (2) 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 NPA boundaries and 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 SPs, 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 calendar days following the Assignment of a new NPA. The meeting announcement shall include the CO Code(s) which are the same as the Home NPA and eligible for release upon implementation of 10-digit local dialing, when applicable. The agenda for the industry implementation meeting should include relevant dates, implementation milestones, customer education considerations, press releases, provision of test numbers, and when applicable, the CO Code(s) which are the same as the Home NPA and eligible for release upon implementation of 10-digit local dialing, Planning Letter (PL) content and subsequent industry communication regarding implementation issues.

5.10 Planning Letter (PL)

NANPA shall post a PL to its website informing the public and the industry of pending NPA relief implementation no more than three (3) weeks after the initial implementation meeting. If regulatory approval of the implementation plan with interval dates is required, the PL shall be published within 14 calendar days of regulatory approval. If an additional implementation meeting is required, the PL shall be published within three (3) weeks of the additional implementation meeting.

5.13 Routing Number Administrator's (RNA) Responsibilities for NPA Relief

This section identifies required relief planning functions that are related to the RNA's functions as specified in these guidelines. The RNA function is currently under the North American Numbering Plan Administrator (NANPA) contract. These functions are identified because they are currently performed in conjunction with non-dialable pseudo-ANI (p-ANI) Assignment. The objective of these functions is to promote effective and efficient p-ANI utilization and thereby help ensure the adequate supply of p-ANI numbers.

NPA relief planning functions included in this section are as follows:

The RNA tracks p-ANI Assignments within NPAs to ensure effective and efficient utilization of numbering resources.

NANPA shall notify all E9-1-1 Service Providers [Selective Router (SR) and Automatic Location Identification (ALI) Service providers], Mobile Positioning Centers (MPC), VoIP Positioning Centers (VPC), Wireless Service Providers and Public Safety Answering Points (PSAP) with the following information by forwarding the NANPA PL:

- The geography affected by the NPA relief implementation plan
- NPA(s) affected
- The date permissive dialing begins
- The date mandatory dialing begins
- The date the NPA is implemented (if not the date mandatory dialing begins)

The RNA will participate on any NPA relief E9-1-1 task force meetings scheduled and provide updates to the E9-1-1 Service Providers, MPCs, VPCs, Wireless Service Providers and PSAPs when necessary.

When an NPA split is to be implemented, the RNA shall not Assign p-ANI resources in a new NPA until the permissive dialing date.

When an NPA overlay is to be implemented, the RNA shall not Assign p-ANI resources in the new NPA until the new overlay NPA has been implemented.

6 Alternative Relief Methods

All of the currently identified code relief alternatives are described below but depending on the particular NPA and the distribution of Assigned CO Codes within it, some alternatives may not be compliant with the criteria in Section 5.0 above (e.g., in an NPA with a high concentration of Assigned CO Codes in one (1) or only a few Rate Centers, the overlay may be the only possible relief method). Possible impacts of these alternatives are found in Annexes B, E and G.

6.1 NPA Split Method

By this method, the exhausting NPA is split into two (2) or more geographic areas and a new NPA code is assigned to one (1) of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing Rate Center boundaries. Number changes are mandatory for customers Assigned Numbers from CO Codes that are moved to the new NPA.

6.2 Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare CO Code capacity. A boundary shift/realignment occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change, and number changes are mandatory for customers Assigned Numbers from CO Codes that are moved to the adjacent NPA. This method applies to multi-NPA states

or provinces only. Boundary realignments must follow Rate Center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Distributed Overlay Method⁷

An all-services distributed overlay occurs when more than one (1) NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. CO Codes from this new NPA are Assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs.⁸ Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the Service Provider's (SP) discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a Permissive Dialing Period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a Permissive Dialing Period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs. They are listed below:

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be considered where the majority of the new TNs are expected to be concentrated in one (1) section of the existing NPA. For example, a fast-growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be Assigned initially to the section of the NPA experiencing the fastest growth, and new CO Codes in that section would be Assigned from the new NPA. As the CO Codes allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available CO Codes to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit local dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA. A concentrated growth overlay may cause customer dialing confusion and additional technical work for some SPs and may require a longer implementation interval.

6.3.2 Boundary Elimination Overlay

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare CO Code capacity. The boundary between these two (2) NPAs is eliminated, and available CO Codes from the adjacent NPA are Assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two (2) NPAs, where one (1) NPA has a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs and may require a longer implementation interval.

6.3.3 Multiple Overlay

The multiple overlay strategy may be considered where relief is required in two (2) or more NPAs. For example, this solution may be appropriate in a metropolitan area where two (2) or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief. The new NPA would be Assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be Assigned for

⁷ The LNPA Working Group Best Practice 30 supports the all-services distributed overlay as the preferred form of area code relief, and was endorsed by the North American Numbering Council (NANC) on September 18, 2013. See http://www.nanc-chair.org/docs/documents.html.

⁸ 47 CFR §52.19 (c) (3) (ii).

new growth within an entire state or province where more than one (1) NPA exists. Multiple overlays may require additional technical work for some SPs and may require a longer implementation interval.

6.3.4 Technology-Specific or Service-Specific Overlay

These overlays occur when a new NPA is introduced to serve the same geographic area as one or more existing NPA(s) and numbering resources in the new NPA overlay are Assigned to a specific technology(ies) or service(s). State commissions may not implement a technology-specific or service-specific overlay without express authority from the FCC.⁹ Such overlays are not feasible where LNP and/or Thousands-Block Number Pooling have been implemented. For purposes of relief planning, a technology-specific or service-specific overlay shall not be considered by the NANPA or the industry.

A state commission seeking delegated authority from the FCC to implement a technology-specific or service-specific overlay should discuss why the numbering resource optimization benefits of the proposed overlay would be superior to implementation of an all-services distributed overlay.¹⁰

6.4 Other Relief Methods

A combination of the methods described above may be used. For example, a concentrated growth overlay could be Assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two (2) NPAs could expand into a distributed or multiple overlays, as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations, projected exhaust, and community needs and requirements.

7 Other Relief Planning Considerations

This section describes miscellaneous considerations that should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Regulatory Involvement

Regulatory Involvement - Involvement of the appropriate regulatory authority staff during NPA Code Relief planning may expedite the process of addressing public policy concerns throughout the process.

7.2 Timing and Schedules

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

⁹ 47 CFR §52.19 (c) (4). See also criteria outlined in FCC 01-362 ¶67-94.

¹⁰ See FCC 01-362 ¶ 81-94.



Relief Planning Meeting Aid Customer Education and Technical Milestones

This meeting aid is a compilation of Industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

	Customer Education Milestones	Responsibility
1	Issue {first/single} customer notification (e.g., bill	
_	messages, bill inserts, direct mail, text messaging, email)	
2	Issue initial press release announcing the new overlay	
	NPA	
3	Send notification of the new NPA to directory publishers	
4	Update social media platforms with information	
	regarding new NPA	
5	Update websites with information regarding the new	
	NPA	
6	Develop language for use in directories to alert the	
	consumers of the new NPA	
	After Permissive 7 and 10-Digit Dialing Period Begins	
7	Issue second customer notification (e.g., bill messages,	
	bill inserts, direct mail, text messaging, email)	
8	Send reminder notification to PSAPs and directory	
	publishers	
9	Update social media platforms with information	
	regarding new NPA	
10	Update websites with information regarding new NPA	
11	Issue second press release just prior to the new NPA	
	effective date	

	Technical Milestones	Responsibility
1	Obtain industry test code from NANPA and activate the	
	test number	
2	Open the test code in carriers' network	
3	LERG updates in BIRRDS or via AOCN (i.e. routing	
	changes, rehomes, change from 7 to 10 terminating digits	
	at end office and at access tandem, etc.	
4	Ensure highway call boxes are programmed with 10-digit	
	dialing	
5	Network ready for permissive dialing	
6	Create permissive dialing Industry contact list	



Relief Planning Meeting Aid Customer Education and Technical Milestones

	Permissive Dialing Period Begins	
7	Establish NPA Specific type of Trunks	
8	Completion of 10-digit signaling transition between	
	carriers' networks	
9	Require email from service providers when the 10-digit	
	signaling transition between carriers' networks has been	
	completed	
10	Update on all speed calling, call forwarding numbers and	
	voicemail options in embedded database to reflect 10-	
11	digit dialing	
11	Recorded announcements in place and tested	
10	E911 Work Plan	
12	Confirm new Emergency Service Number	
	(ESN)/Numbering Plan Digit (NPD) has been	
	established for the new NPA if needed	
	Ensure SRDB table has been updated with the new NPA	
14	Notify PSAPs, PSALI customers and County	
	Coordinators	
	Notify Statewide 911 Coordinator	
16	Review and submit CLEC trunk order requests to local	
	provider if needed	
	Update PSAP equipment to recognize new NPA	
	Trunk orders complete	
19	Build E911 Network/Tandem Translations	
20	Verify if all PSAP work has been completed	
21	Activate E911 Network/Tandem Translations	

The above are the typical milestones necessary for implementation of an all-services distributed overlay for an NPA that is already in 10-digit or 1+10-digit local dialing; however, these milestones may need to be modified during the actual implementation.





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PUBLIC UTILITIES CODE - PUC

DIVISION 4. LAWS RELATING TO UTILITY CORPORATIONS AND THEIR EMPLOYEES [7503 - 8286] (Division 4 enacted by Stats. 1951, Ch. 764.)

CHAPTER 3.5. New Area Codes [7930 - 7943] (Chapter 3.5 added by Stats. 1990, Ch. 199, Sec. 1.)

- 7930. The Legislature finds and declares all of the following:
- (a) The explosive demand for new area codes in California requires more area codes to be established than was envisioned when this chapter and Section 2887 were enacted in 1990.
- (b) Because of the advent of competition in the local telecommunications market, and a decision by the Federal Communications Commission, new area codes are established by the North American Numbering Plan Administrator in conjunction with the commission and members of the telecommunications industry.
- (c) In order to eliminate potential confusion for all the parties involved in the process of establishing new area codes, the changes to this chapter enacted in the 1997-98 Regular Session include identifying "providers" in Section 7931.
- (d) The "providers" specified in Section 7931 include telephone corporations and resellers that are regulated by the commission, and paging companies that are not regulated by the commission. It is necessary to include all of these entities within the term "providers" in order to effectively meet the needs of the state as they relate to the establishment of new area codes. The Legislature does not, however, by including paging companies as "providers" in Section 7931, intend to expand the jurisdiction of the commission over paging companies beyond the requirements of this chapter. The Legislature continues to recognize the status of paging companies as unregulated entities.

(Repealed and added by Stats. 1998, Ch. 534, Sec. 3. Effective January 1, 1999.)

- 7931. (a) This chapter is applicable to telephone corporations, including resellers, and to paging companies, hereafter referred to as providers.
- (b) For purposes of this chapter, "coordinator" means the "coordinator for California area code relief" as designated by the North American Numbering Council.
- (c) Whenever the coordinator and providers evaluate the potential boundaries of a new area code, they shall consider rate area boundaries, municipal boundaries, communities of interest, and other appropriate criteria.
- (d) When the coordinator determines the need to establish a new area code, at least 30 months prior to the projected opening of the new area code, the coordinator shall provide written notice to the commission regarding the need to establish the new area code.
- (e) From the date the written notice required by subdivision (d) is received by the commission all of the following shall be done:
 - (1) Within three months all providers shall notify all affected customers in writing of the need to establish a new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed number.
 - (2) Within nine months the coordinator and the commission staff shall notify representatives of local jurisdictions and the public in affected geographic areas, and, at the discretion of the commission, may conduct one or more meetings both for representatives of local jurisdictions and for members of the public in affected geographic areas to inform them of the proposed area code relief options and of measures that may be taken to mitigate any potential disruptions, and to afford them the opportunity to discuss the potential impact of the proposed options.
 - (3) Within 11 months the coordinator shall file the results of the area code relief planning process with the

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commission requesting commission approval to implement a plan. Anyone may contest the results of the area code planning process by filing a written protest with the commission not later than 60 days after the results have been filed with the commission.

- (f) Unless the commission determines otherwise, at least 12 months prior to the date adopted by the commission for opening the new area code, all of the following shall be done:
 - (1) The coordinator shall notify the general public of the specific geographic area to be included in both the old and new area codes. The notice shall include the schedule for any transitional dialing periods required by Section 7932.
 - (2) Each telephone provider serving the specific geographic area included in the existing area code shall give written notice to all its affected customers about the specific geographic area that will be included in the new area code. The notice shall include the schedule for any transitional dialing periods required by Section 7932, and the prefixes that will be contained in the new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed telephone number.
- (g) Within three months prior to the adopted date for opening the new area code, each provider serving the existing area code shall give written notice to its affected customers of the specific geographic boundaries of the new area code. The notice shall include the schedule for any transitional periods required by Section 7932, and the prefixes that will be contained in the new area code. Nothing in this paragraph requires a customer to receive in one bill more than one notice for each billed number.

(Amended by Stats. 2017, Ch. 425, Sec. 13. (SB 385) Effective January 1, 2018.)

- 7932. (a) Whenever a provider opens a new area code, it shall do all of the following:
 - (1) If the new area code plan permits seven-digit dialing, provide for a transitional dialing period during which a number in the new area code, or a number in the existing area code, may be reached by dialing either the seven-digit called number, or the area code plus the seven-digit called number.
 - (2) Subsequent to the transitional dialing period provided in paragraph (1), if prefix codes are available, permit callers to reach a recorded announcement, without charge, that will inform the caller of the new area code when the existing area code is dialed.
 - (3) If the new area code plan requires 10-digit dialing within an area code, provide for any transitional dialing period or recorded announcements the commission may order.
- (b) Paragraphs (1) and (2) of subdivision (a) shall no longer be operative if an authorized federal or state agency orders mandatory 10-digit dialing.

(Added by renumbering Section 7931 by Stats. 1998, Ch. 534, Sec. 5. Effective January 1, 1999.)

7933. The rate structure of any call originating in or made to an area code shall not change with the split of an area code into two or more area codes, regardless of the number of digits dialed.

(Added by renumbering Section 7932 by Stats. 1998, Ch. 534, Sec. 6. Effective January 1, 1999.)

- 7934. The Legislature finds and declares all of the following:
- (a) The number of area codes in this state has more than doubled since 1991.
- (b) The proliferation of area codes has caused undue hardship on citizens of this state, who have begun to be forced into new area codes after years of having the same telephone number.
- (c) That proliferation has substantially increased costs to businesses, individuals, and government agencies.
- (d) New area codes require the replacement of business cards and letterhead stationery, and companies must use employee time contacting their customers to ensure that those customers are able to continue to reach the affected company.
- (e) The proliferation of area codes has also reduced worker productivity as employees begin using new and unfamiliar area codes.
- (f) It is the policy of the Legislature that existing area codes should be preserved for as long as possible.
- (g) It is the further policy of the Legislature that the hardship currently experienced by telecommunications customers as a result of the creation of new area codes should be alleviated.
- (h) For all of the reasons stated above, it is necessary for the commission, as a public agency, to take all possible

measures to protect area codes as a public resource, stop area code proliferation, and review their existing practice of establishing new area code regions and the creation of area code overlays.

(Added by Stats. 1999, Ch. 809, Sec. 2. Effective October 10, 1999.)

- 7935. (a) The commission shall develop and implement any measures it determines to be available for telephone corporations that possess prefixes to efficiently allocate telephone numbers within those prefixes. The commission shall consider the cost effectiveness of these measures before requiring implementation. Among the measures the commission shall consider are rate center consolidation, allocation of numbers in blocks smaller than 10,000, and unassigned number porting.
- (b) For the purpose of this section, in accordance with the North American Numbering Plan, a telephone number consists of a three digit area code or number plan area (NPA), a three digit prefix or NXX code, and a four digit line number.

(Added by Stats. 1999, Ch. 809, Sec. 3. Effective October 10, 1999.)

7936. The commission shall direct the North American Numbering Plan Administrator to obtain utilization data for any area code for which a relief plan is proposed, prior to adopting a plan for, or setting a date for, relief. (Added by Stats. 1999, Ch. 809, Sec. 4. Effective October 10, 1999.)

7938. The commission shall require, as an interim measure until the commission develops procedures for number pooling or adopts utilization standards, that number assignments made by telephone corporations to their customers shall be made first from prefixes that are more than 25 percent in use. A telephone corporation may assign numbers from prefixes with less than 25 percent use only to the extent necessary, if numbers from prefixes that are more than 25 percent in use are not otherwise available.

(Added by Stats. 1999, Ch. 809, Sec. 6. Effective October 10, 1999.)

- 7939. (a) If the commission or an authorized federal agency establishes a process to ensure that telephone numbers can be allocated in blocks smaller than 10,000, the commission shall require that a telephone corporation return to the North American Numbering Plan Administrator blocks of telephone numbers for reassignment, in a quantity determined by the commission.
- (b) The commission shall direct the North American Numbering Plan Administrator to seek the return of blocks of numbers smaller than 10,000 not in use. The commission, for purposes of this section, shall define "not in use." (Added by Stats. 1999, Ch. 809, Sec. 7. Effective October 10, 1999.)
- **7940.** A telephone corporation doing business in this state that possesses one or more telephone number prefixes, or portions thereof, shall provide to the commission or its agent, upon request, use information pertaining to both those prefixes in use and those prefixes not in use, according to any schedule established by the commission. (Added by Stats. 1999, Ch. 809, Sec. 8. Effective October 10, 1999.)
- <u>7943.</u> (a) It is the intent of the Legislature that when the commission has no reasonable alternative other than to create a new area code, that the commission do so in a way that creates the least inconvenience for customers.
- (b) The commission shall request that the Federal Communications Commission grant authority for the commission to order telephone corporations to assign telephone numbers dedicated to mobile telephony service and mobile data service, as defined in Section 224.4, to a separate area code and to permit seven digit dialing within that technology-specific area code and the underlying preexisting area code or codes.
- (c) Before approving any new area code, the commission shall first perform a telephone utilization study and implement all reasonable telephone number conservation measures.
- (d) If the commission receives the grant of authority set forth in subdivision (b) and determines that further area code relief is needed, the commission shall exercise the authority granted to it in subdivision (b) unless it finds at least one of the following:
 - (1) Exercising the authority granted by subdivision (b) would be more disruptive to the customers where area code relief has been determined to be necessary.
 - (2) Exercising the authority granted by subdivision (b) will not adequately extend the life of the area code where relief has been determined to be necessary.
- (e) The commission may not implement any authority granted by the Federal Communications Commission pursuant

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Codes Display Text

to subdivision (b), in a manner that impairs the ability of a customer to have number portability. (Amended by Stats. 2006, Ch. 198, Sec. 25. Effective January 1, 2007.)

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	California 626 NPA Rate Center List						
NPA	Abbreviated Rate Center	Rate Center Full Name					
626	ALHAMBRA	ALHAMBRA					
626	ARCADIA	ARCADIA					
626	AZUSA	AZUSA-GLENDORA					
626	COVINA	COVINA					
626	EL MONTE	EL MONTE					
626	LA PUENTE	LA PUENTE					
626	MONROVIA	MONROVIA					
626	PSDN PSDN	PASADENA:PASADENA DA					
626	SIERRAMADR	SIERRA MADRE					
626	SNGBLCNN	SAN GABRIEL CANYON					

California 626 NPA CO Code Holders					
Company	OCN	CO Code Count			
33 WIRELESS INC.	6967	4			
AMERICAN MESSAGING SERVICES, LLC	6906	2			
AMERICAN MESSAGING SERVICES, LLC	9748	2			
AT&T - LOCAL	7421	1			
AT&T CORP.	516C	1			
BANDWIDTH.COM CLEC, LLC - CA	981E	13			
BLUIP, INC.	819H	1			
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - CA	6006	37			
CENTURYLINK COMMUNICATIONS, LLC	508J	1			
CHARTER FIBERLINK CA-CCO, LLC - CA	776C	4			
COMMIO, LLC	939H	3			
EXIANT COMMUNICATIONS LLC	114J	2			
FRACTEL, LLC	965H	35			
FRONTIER CALIFORNIA INC.	2319	75			
GLOBAL CROSSING LOCAL SERVICES, INC CA	8690	6			
HD CARRIER LLC	321J	1			
IP HORIZON LLC	515J	2			
LEVEL 3 COMMUNICATIONS, LLC - CA	8826	24			
LEVEL 3 TELECOM OF CALIFORNIA, LP - CA	7718	10			
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229	21			
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - CA	7240	11			
METROPCS NETWORKS, LLC	899D	16			
NEW CINGULAR WIRELESS PCS, LLC	6010	80			
NORTH COUNTY COMMUNICATION CORPORATION - CA	7894	3			
ONVOY SPECTRUM, LLC	624H	4			
ONVOY, LLC - CA	649C	36			
PACIFIC BELL	9740	115			
PACIFIC BELL (COMPETITIVE)	7480	6			
PAETEC COMMUNICATIONS, INC CA	4733	11			
PEERLESS NETWORK OF CALIFORNIA, LLC - CA	373F	8			
SHELCOMM	0051	2			
SKYE TELECOM LLC DBA SKYETEL	622J	1			
TELEPORT COMMUNICATIONS AMERICA, LLC - CA	7139	18			
TIME WARNER CBL INFO SVCS (CA) DBA TIME WARNER CAB	576C	3			
T-MOBILE USA, INC.	6529	106			
TON80 COMMUNICATIONS, LLC	516J	1			
U.S. TELEPACIFIC CORP. DBA TPX COMMUNICATIONS	671J	40			

USA MOBILITY WIRELESS, INC.	6630	7
UTILITY TELECOM GROUP, LLC - CA	9262	7

California 626 NPA Thousands-block holders with No CO Codes Assigned					
Company	OCN				
BARR TELL USA, LLC	026K				
TELNYX LLC	073H				
TERRA NOVA TELECOM INC.	145J				
RCLEC, INC.	156J				
VONAGE AMERICA LLC	197D				
WIDE VOICE, LLC - CA	252F				
DMR COMMUNICATIONS INC CA	478A				
DISH WIRELESS, LLC	490J				
WHITESKY COMMUNICATIONS, LLC	553J				
INTEGRATED PATH COMMUNICATIONS, LLC - CA	707H				
CONNECTTO COMMUNICATIONS, INC CA	863D				
AIRESPRING, INC.	996H				

Background Information for the 626 NPA Relief Project

Relief Planning Background

The 626 NPA was introduced in 1997 when relief was needed for the 818 NPA and a geographic split was implemented. The 818 NPA was implemented in 1984 when the 213 NPA was split, and the 213 NPA was one of the first three NPAs assigned to California with the introduction of the North American Numbering Plan ("NANP") in 1947.

In 1999, relief planning was initiated for the 626 NPA and in September 1999 the California Public Utilities Commission ("Commission") instituted a lottery for the 626 NPA and distributed five (5) Central Office ("CO") codes monthly. Thousands-block pooling was implemented in May of 2002 and on September 20, 2010 the Commission eliminated rationing. Due to these actions, the need to introduce a new area code in the 626 geographic area was delayed.

The 626 NPA encompasses a large portion of the San Gabriel Valley, including the eastern portion of Los Angeles County and serves communities including but not limited to Alhambra, Arcadia, Azusa, Baldwin Park, Covina, El Monte, Glendora, La Puente, and Pasadena.

The 626 NPA is bordered to the north by the 661 NPA, to the east by the 442/760 and 840/909 NPAs, to the south by the 562 and 657/714 NPAs, and to the west by the 213/323/738 and 747/818 NPAs.

On July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline by July 16, 2022. The Order required covered providers to implement mandatory 10-digit dialing in NPAs that use both 7-digit dialing and 988 as an NXX. Telecommunications carriers enforced mandatory 10-digit local dialing by July 15, 2022. The 626 NPA transitioned to 1 + 10-digit local dialing to ensure users can dial 988 and reach the National Suicide Prevention Lifeline now known as the Suicide and Crisis Lifeline. Information pertaining to the transition to 10-digit local dialing due to the designation of the 988, three-digit access code can be found in Planning Letter 556 (PL-556) which is available on the NANPA website.

As stated in section 5.6.3 of the NPA Relief Planning and Notification Guidelines, "Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing shall include the state's existing overlay dialing plan." An area code overlay is the only option for relief of the 626 NPA. Adding a new overlay NPA to the 626 NPA will provide approximately 33 years until subsequent area code relief planning would be needed.

Exhaust Forecast

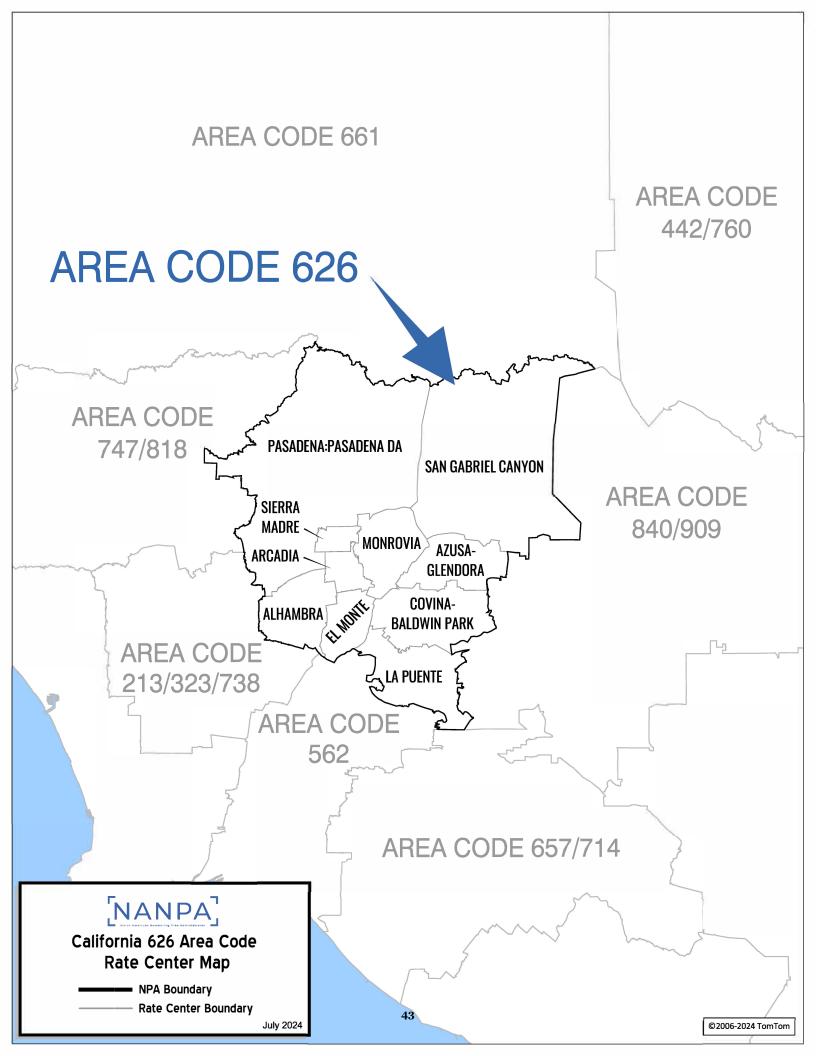
The October 2024 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2024 NRUF Report"), published by NANPA, projects the 626 NPA will exhaust during the fourth quarter of 2027. Relief planning is to begin in the fourth quarter of 2024.

CURRENT DIALING PLAN OF THE 626 NPA

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or	1+ 10 digits (NPA-NXX-XXXX)
	Foreign NPA (FNPA)	
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)

Central Office Code/Thousands-Block Summary (Data as of December 19, 2024)									
	Assigned NXXs	Reserved NXXs	Unavailable NXXs	Available NXXs	Total				
626 NPA	721	0	14	65	800				
Codes Assignment History 626 NPA	2019 12	2020	2021 26	2022	2023	2024 24			
Codes Assigned (Time period: 12/1/23 - 12/19/24)	Pool Replenishment 27	Dedicated Customers	For LRNs	Total 27					
Codes Forecasted	Pool Replenishment & Dedicated Customers 12	LRNs 0	Total 12						
Blocks Assigned (Time period: 12/1/23 - 12/19/24)	390		Blocks Available	73					
Rate Centers	Mandatory	Mandatory Single Service Provider	Optional	Excluded	Total				
The Contons	10	0	0	0	10				
Based on the October 2024 NRUF and NPA Exhaust Analysis, the 626 NPA is projecte to exhaust in 4Q2027.									

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), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).



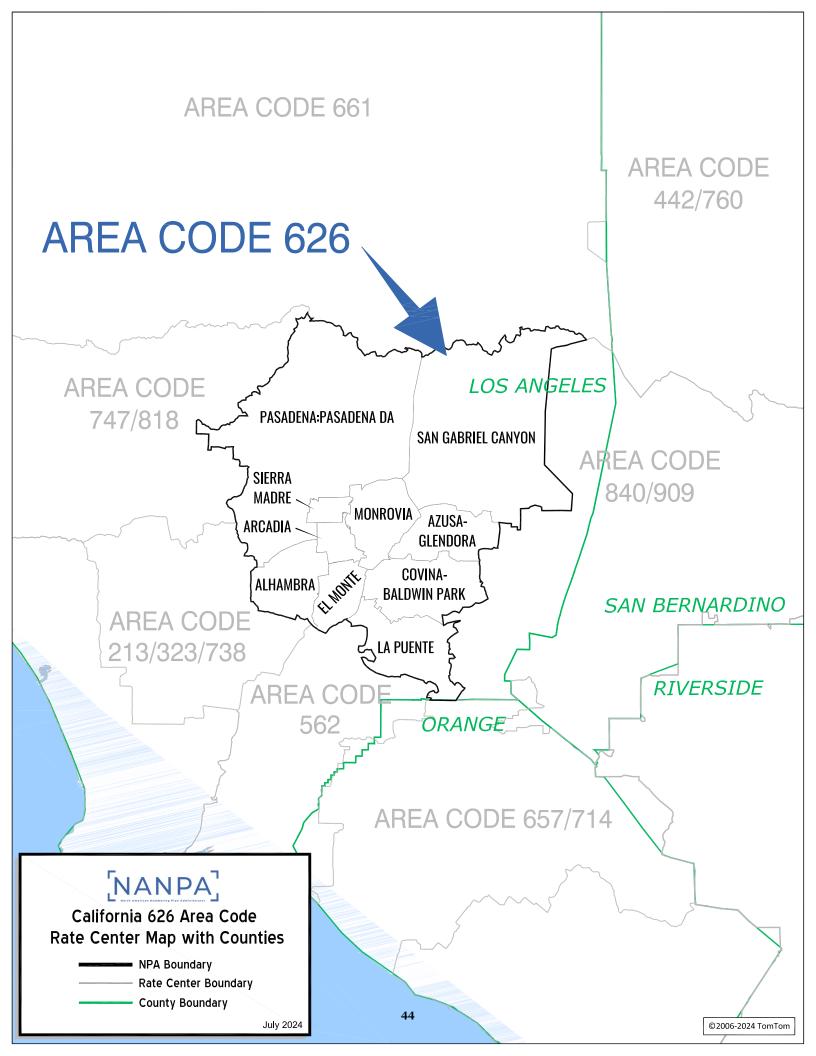


EXHIBIT B



February 4, 2025

To: All 626 NPA Code Holders, Block Holders and Interested Industry Members (California)

Subject: Final Minutes of the Draft Application Review Meeting for the 626 NPA

Attached are the final minutes from the January 9, 2025, California 626 NPA draft application review meeting. These minutes became final on January 31, 2025.

If you have any questions, you can email hwayman@nanpa.com or call (571) 363-3824.

Sincerely,

Heidi A. Wayman Manager, Data Management NANPA

CC: Peter Chang – California Public Utilities Commission Lina Khoury – California Public Utilities Commission Siamack Donighi – California Public Utilities Commission

CALIFORNIA 626 NPA Draft Application Review Meeting Final Minutes January 9, 2025

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, Manager, Data Management, North American Numbering Plan Administrator ("NANPA"), opened the meeting with introductions and a review of the agenda. A list of attendees can be found in Attachment #1.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Heidi stated the Alliance for Telecommunications Industry Solutions ("ATIS") approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she 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.

NANPA'S ROLE AND RESPONSIBILITIES

Heidi reviewed NANPA's relief planning role and responsibilities as follows:

- Start the relief planning process 36 months prior to exhaust of the Numbering Plan Area ("NPA").
- Distribute the notice with the draft application three weeks prior to the initial relief planning meeting, which was completed on December 19, 2024, and a meeting reminder notice was distributed on January 7, 2025.
- Facilitate the meeting, to assist the telecommunications industry of California ("Industry") with reaching consensus on the application for relief to be filed with the California Public Utilities Commission ("Commission").
- Determine any additional items to include in the filing with the Commission such as the state dialing plan, implementation intervals and comply with any state-specific requirements.
- Then NANPA is charged with the responsibility of filing a relief application, on behalf of the Industry, with the Commission. Once the Industry comes to consensus on what should be included in the filing, NANPA will file the regulatory filing as decided by the Industry or as required by the state statute.

A member of the Industry asked how the current fires in Los Angeles will impact the implementation of relief in the 626 geographic area. Heidi stated that NANPA is to begin relief planning 36 months prior to exhaust and file the application for relief with the Commission. The group reached consensus that the application should be filed and any impacts to the implementation of the new overlay NPA, will be addressed when they commence the implementation phase of relief. Commission staff stated they are monitoring the fires and their impacts and will notify the Industry if the 626 NPA application process will need any schedule adjustments.

INDUSTRY GUIDELINES

Heidi stated an overlay is the only option for relief of the 626 NPA, and reviewed Section 5.6.3 of the NPA Code Relief Planning and Notification Guidelines ("Guidelines") which state:

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing¹, then the IPD, relief planning meeting, and industry Consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing 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 filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six (6) months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within seven (7) weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 - 5.12.

Heidi reviewed Guidelines Section 6.3:

An all-services distributed overlay occurs when more than one (1) NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. CO Codes from this new NPA are Assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs. Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the Service Provider's (SP) discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a Permissive

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¹ For example, FCC 20-100, ¶53.

² 47 CFR §52.19 (c) (3) (ii).

Dialing Period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a Permissive Dialing Period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs.

Heidi also reviewed Guidelines Section 7.2:

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be completed at least six (6) months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three (3) months before the existing NPA would exhaust under the highest growth projections. For overlays, relief is completed when mandatory 10-digit local dialing has been implemented and the new NPA becomes effective.

Heidi referred the participants to the relief planning meeting aids included in the meeting notice, excerpts from the Guidelines, and the Customer Education and Technical Milestones. These meeting aids will assist the participants in their decision making and the Guidelines can be downloaded from the ATIS web site at: www.atis.org. Heidi also reviewed the 626 NPA maps with rate centers and county boundaries, Rate Center Table, and CO Code Holder and Thousands-Block Holder Tables.

BACKGROUND

The 626 NPA was introduced in 1997 when relief was needed for the 818 NPA and a geographic split was implemented. In 1999, relief planning was initiated for the 626 NPA and in September 1999 the California Public Utilities Commission ("Commission") instituted a lottery for the 626 NPA and distributed five (5) Central Office ("CO") codes monthly. Thousands-block pooling was implemented in May of 2002 and on September 20, 2010 the Commission eliminated rationing. Due to these actions, the need to introduce a new area code in the 626 geographic area was delayed until now.

The 626 NPA encompasses a large portion of the San Gabriel Valley, including the eastern portion of Los Angeles County and serves communities including but not limited to Alhambra, Altadena, Arcadia, Azusa, Baldwin Park, Covina, El Monte, Glendora, La Puente, and Pasadena.

The 626 NPA is bordered to the north by the 661 NPA, to the east by the 442/760 and 840/909 NPAs, to the south by the 562 and 657/714 NPAs, and to the west by the 213/323/738 and 747/818 NPAs.

On July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline by July 16, 2022. The Order required covered providers to implement

mandatory 10-digit local dialing in NPAs that use both 7-digit local dialing and 988 as an NXX. Telecommunications carriers enforced mandatory 10-digit local dialing by July 15, 2022. The 626 NPA transitioned to 1 + 10-digit local dialing to ensure users can dial 988 and reach the National Suicide Prevention Lifeline now known as the Suicide and Crisis Lifeline. Information pertaining to the transition to 10-digit local dialing due to the designation of the 988, three-digit access code can be found in Planning Letter 556 (PL-556) which is available on the NANPA website.

As previously reviewed in section 5.6.3 of the Guidelines, an area code overlay is the only option for relief of the 626 NPA. The projected life of adding a new NPA overlay of the 626 NPA is approximately 33 years based on the current assignment rate.

CENTRAL OFFICE ("CO") CODE/THOUSANDS-BLOCK STATUS FOR THE 626 NPA Heidi provided a read-out of the monthly CO code assignment activity for the California 626 NPA. As of January 8, 2025, the 626 NPA has 721 CO codes assigned, 65 CO codes available for assignment and 14 unavailable CO codes. (See Attachment #2)

There are 10 rate centers in the 626 NPA, and all 10 rate centers are mandatory for pooling. From January 1, 2024 through January 8, 2025, there were 374 thousands-blocks assigned and 24 CO codes assigned, 23 for pool replenishment and one (1) for a dedicated customer. As of January 8, 2025, there are 55 thousands-blocks available. The forecasted need for CO codes for the next twelve months is seven (7) CO codes for pool replenishment and dedicated customers. (See Attachment #2)

Exhaust Forecast

The October 2024 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("October 2024 NRUF Report"), published by NANPA, indicated that the 626 NPA would exhaust during the fourth quarter of 2027.

STATEMENT FOR THE RECORD

The following *Industry Statement for the Record* was provided during the meeting. After some discussion, the participating members reached consensus to include it in the minutes and have it included as Attachment #1 to the Application filed with the Commission.

Industry Statement for the Record

All-Service Overlay for the 626 NPA

The Industry respectfully requests that the Commission approve the industry's Application to implement an all-services distributed overlay for relief of the 626 area code, including its proposed implementation interval and Public Education Plan (PEP), no later than February 28, 2026. The Industry's proposed schedule and PEP allow the Industry to implement relief efficiently, avoid holiday network freeze timeframes, avoid other overlay relief implementation dates across the country, and reduce the risk of running out of 626 numbers before relief is implemented.

The Industry will work together to ensure the overlay implementation is successful. No paid advertising is necessary for a successful implementation because:

- Mandatory 1+10-digit dialing has been in place in the 626 area code since July 2022, so there is no need for a permissive dialing period or customer education about 1+10-digit dialing.
- Educating 626 customers about the new overlay area code is just an informational exercise. Californians are already extremely familiar with multiple area codes and mandatory 1+10-digit dialing. Mandatory 1+10-digit dialing is the predominant dialing plan in California, required in all but two area codes by the time this overlay is implemented.
- The Industry is quite experienced in educating customers about the introduction of new overlay area codes when mandatory 10-digit or 1+10-digit dialing is already in place. By the time implementation for this overlay will need to start, the Industry will have implemented at least four such overlays in California, with no paid advertising being used.
 - The Industry has already implemented similar overlays in Arizona, Colorado, Florida, Georgia, Illinois, Maryland, Missouri, New York, North Carolina, Ohio, Pennsylvania, Texas, Virginia, Washington and Wisconsin. No paid advertising was used in any of those.
 - The Industry has implemented more than 60 overlays across the United States in the last ten years, and none other than six overlays implemented in California used paid advertising. Further, no more than two news releases were issued in any of those implementations either, except for the four most recent overlays implemented in California.
- Paid advertising requirements in PEPs create the need for a funding mechanism, and past PEPs demonstrate that the funding mechanism is a burdensome, inefficient and unnecessarily complex process shouldered unfairly by a few industry volunteers.
- For the 626 overlay with its simple informational messaging about the new overlay area code, paid advertising and a funded PEP doesn't make fiscal sense. It would be virtually impossible to implement a funded PEP within the recommended 9-month implementation schedule.

In the four most recent overlays implemented in California, the Commission has required three news releases, in addition to the news release the Commission issued on the date of decision. A total of four news releases is excessive and media interest tends to wane with each successive release. The industry recommends that no more than one news release, in addition to the Commission's date of decision news release, be issued.

REVIEW DRAFT RELIEF APPLICATION FOR THE 626 NPA

Heidi reviewed the draft relief application for the 626 NPA distributed on December 19, 2024, which recommends an all-services distributed overlay. A new NPA code would be assigned to the same geographic area occupied by the existing 626 NPA. Existing customers would retain their current telephone numbers. The projected life of the new NPA overlay area is approximately 33 years based on current assignment rates. Consensus was reached to approve

the application as edited by the participants during the meeting.

The following dialing plan is the current dialing plan for the 626 NPA. Consensus was reached by the participating members to add the following statement to the existing dialing plan, * 10-digit dialing permissible at wireless providers' discretion.

Current Dialing Plan for the 626 All-Services Overlay

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

^{*10-}digit dialing permissible at wireless providers' discretion

ESTABLISH IMPLEMENTATION SCHEDULE

Consensus was reached by the participating members to recommend to the Commission a nine (9)-month schedule for implementation of the overlay with the new NPA becoming effective six (6)-months prior to the forecasted exhaust date. Since mandatory 1+10-digit dialing is already in place, a permissive dialing period is not needed. The meeting participants also reached consensus to recommend that CO codes will not be assigned in the new overlay NPA until all available codes in the 626 NPA are assigned. The recommended schedule is as follows:

Implementation Schedule for an All-Services Overlay

EVENT	TIMEFRAME		
Customer Education and Network	Implementation State Date selected by the		
Preparation Period Begins*	Industry		
Effective Date of CO codes in the new NPA **	Nine (9) months after the Implementation Start Date selected by the Industry		
MIA	Six (6) months prior to exhaust		

^{*} There is no requirement for a permissive dialing period because mandatory 1+10-digit local dialing is already in place.

CUSTOMER EDUCATION PLAN

There was discussion regarding any additional items to be included in the application and consensus was reached to include the Industry's *Public Education Program (PEP) for 626 Area Code Relief*.

^{**}CO codes in the new NPA will not be assigned until all available codes in the existing 626 NPA are allocated.

Public Education Plan (PEP) for 626 Area Code Relief

(CPUC staff may grant amendments as needed during implementation)

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
1	Effective date of decision approving 626 area code overlay	NA	NA	Date of Decision (DOD)		DOD should be no later than 2/28/2026. Industry will then select an Implementation Start Date that is no later than 7/1/2026.
2	Post-Commission meeting news release announcing the 626 area code overlay relief plan, and the new overlay area code. Post CPUC news release to CPUC website and social media platforms.	All customers	CPUC	DOD		The CPUC will issue a News Release similar to the CA 530 Overlay which was issued 6/8/2023: https://www.cpuc.ca.gov/news -and-updates/all-news/cpuc- provides-more-numbers-for- 530-area-code-2023
3	NANPA 626 implementation meeting, and request for industry participation on PEP task force and subcommittees. Determination of Implementation Start Date (ISD)	CPUC Staff and Industry	CPUC staff and industry	3-6 weeks after DOD		The NPA Relief Planning Guidelines require NANPA to hold this meeting within 6 weeks of the DOD. The Implementation Start Date (ISD) will be selected by the Industry at this meeting.
4	Implementation Start Date (ISD) – Start Implementation	Industry	Industry			No later than 7/1/2026

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
5	First news release announcing the 626 area code relief plan, the 626 area code geographic boundaries, and the new overlay area code for issue within the 626 area code and adjacent area codes, to media and key entities, including chamber of commerce and local governments. Post new release to CPUC website and social media platforms.	All customers	Industry and CPUC staff	1 month after ISD		No permissive dialing period is needed because customers will have already been educated by 07/2022 and mandatory 1+10-digit dialing implemented due to the 988 implementation. See the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes .
6	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 626 area code overlay.	CPUC staff	Industry	2 months after ISD		
7	626 overlay information distributed internally as job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual service providers	2 months after ISD		

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
8	Provide by email targeted letters with the information in Customer Notification , along with PEP Task Force contact information, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm service providers, (3) public safety organizations and PSAPs, providers, (4) telephone directory publishers, and (5) California Relay Services throughout the 626 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/ activist organizations, chambers of commerce, city councils and other key government agencies, alarm service providers, public safety organizations and PSAPs, telephone directory publishers, and California Relay Services	Industry	2 months after ISD		Entities stricken here are those that need education when mandatory 1+10-digit dialing is implemented, but not here when such education and mandatory 1+10-digit dialing has already been implemented due to the 988 implementation. See the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes .
9	626 area code overlay update to industry websites.	All customers	Individual service providers	3 months after ISD		

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
10	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including major local broadcast television stations) of the 626 area code overlay.	CPUC staff	Industry	5 months after ISD		
11	Second news release reminding the public of the 626 area code plan, the 626-area code geographic boundaries, and the new overlay area code for issue within the 626 area code and adjacent area codes. Post CPUC new release to CPUC website and social media platforms	All customers	CPUC staff and industry	8.5 months after ISD		Mandatory 1+10-digit dialing has already been implemented by 07/15/2022 due to the 988 implementation. See Milestones #33 in the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes. This news release is just a reminder of the new overlay area code effective date.
12	Published Directories: Add information on cover to alert 626 area code customers about the new overlay area code	All customers	Individual service providers	9 months after ISD		
13	Single customer notification runs for two bill cycles. Announce the 626 area code overlay, indicate the affected areas, and the new area code effective date.	All customers	Individual service providers	9 months after ISD		Customer notice to run two months (2 bill cycles requirement)

Activity	Description	Audience	Shared or Individual Service Provider Effort	Completion Date	Recommended Due Date	Explanation or Rationale
14	New NPA/Area Code assigned and implementation completed			9 months after ISD		New overlay area code becomes effective 9 months after the ISD selected by the Industry.
15	Provide to CPUC Communications Division email or written confirmation from the California Telecommunications Industry identifying media coverage (including local broadcast television stations) of the 626 area code overlay.	CPUC Staff	Industry	9.5 months after ISD		Entities stricken here are those that need education when mandatory 1+10-digit dialing is introduced, but not here when such education has already taken place due to the 988 implementation. See Milestones #3, 4, 7, 18, 19, 21 and 25 in the industry 988 milestones list posted at https://www.nanpa.com/numbering/abbreviated-codes.

Additionally, consensus was reached to include the following technical milestones that will be utilized by the Industry for implementation of the all-services distributed overlay. These are the typical milestones necessary for implementation of an all-services distributed overlay that is already in 10-digit or 1+10-digit local dialing; however, these milestones may need to be modified during the actual implementation.

	Technical Milestones	Responsibility			
1	Obtain industry test code from NANPA and activate the test number.	One Service Provider Volunteer			
2	Open the test code in carriers' network	All Service Providers			
3	Establish NPA Specific type of Trunks	All Service Providers (if not already in place)			
	E911 Work Plan	Responsibility			
4	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA if needed	E911 Providers			
5	Ensure SRDB table has been updated with the new NPA	E911 Providers			
6	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers			
7	Notify Statewide 911 Coordinator	Industry Co-chairs			
8	Review and submit CLEC trunk order requests to local provider if needed	All Service Providers (as needed)			
9	Update PSAP equipment to recognize new NPA	PSAPs			
10	Trunk orders complete	E911 Providers			

11 Build E911 Network/Tandem Translations	E911 Providers
12 Verify if all PSAP work has been completed	PSAPs
13 Activate E911 Network/Tandem Translations	All Service Providers

STATE STATUTE REQUIREMENTS

Heidi mentioned that the California Public Utilities Code, Section 7931, has certain notification requirements:

NANPA is to formally notify the CPUC at least *30 months prior* to the projected opening of a new NPA;

- <u>Within three-months of that notice</u>, all Service Providers are to notify all customers in writing of the need to establish a new area code and;
- -<u>Within 9 months of that notice to the CPUC</u> the staff and the area code relief coordinator (NANPA) are to notify representatives of local jurisdictions and the public in affected geographic areas, and, at the discretion of the commission, may conduct one or more meetings both for representatives of local jurisdictions and members of the public to inform them of the proposed area code relief.

Heidi stated NANPA will send a formal notification to the Commission notifying them that a new area code is needed for relief of the 626 NPA and will be posted via the NANP Notification System ("NNS"). In lieu of public meetings, the Commission staff and NANPA will be recording a webcast which will be posted to the Commission website. Within three months of this notice being sent to the Commission, all service provider OCNs with assigned CO codes or thousands-blocks must inform their customers of the need for the new area code and the webcast. The customer notice verbiage will be drafted and approved by the Commission staff and sent out via NNS as well as emailed to all service provider OCNs in the 626 NPA. Heidi reminded the participants to keep their NAS user profiles active to ensure they are receiving NNS notifications.

OPEN DISCUSSION

There were no additional items for discussion.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Participants reached consensus that NANPA will file the application for relief of the 626 NPA with the Commission informing it of the outcome of this relief planning meeting by February 27, 2025.

MEETING MINUTES DISTRIBUTION AND APPROVAL OF THE MINUTES

The meeting minutes will be posted no later than January 23, 2025. The Industry is to provide any suggested edits to Heidi Wayman via email at hwayman@nanpa.com. Any changes to the minutes should be provided within one week of posting, when the minutes will become final.

NANPA Meeting Adjourned

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These minutes became final on January 31, 2025.

California 626 NPA Draft Application Review Meeting January 9, 2025 Participants

NAME	COMPANY			
Jeanne Bell	Allstream/Zayo			
George Guerra	AT&T			
Javier Rodriguez	AT&T			
Lina Khoury	California Public Utilities Commission			
Siamack Donighi	California Public Utilities Commission			
Dan Bowlin	DISH Wireless			
Judy Geise	Frontier Communications			
Laura Simmons	Frontier Communications			
Rachel Gredler	Frontier Communications			
Margaret Cox	Lumen			
Heidi Wayman	NANPA			
Cecilia McCabe	NANPA			
Linda Hymans	NANPA			
Florence Weber	NANPA			
Allyson Blevins	Sinch			
Rebecca Morrow	Sinch			
Claudia Trinidad	TPx Communications			
Shaunna Forshee	T-Mobile			
Chanda Brown	Verizon			
Brandon Orozco	Verizon			
Sharon Pistachio	Verizon Wireless			
Elizabeth Ward	Verizon Wireless			

Central Office Code/Thousands-Block Summary (Data as of January 8, 2025)								
	Assigned NXXs	Reserved NXXs	Unavailable NXXs	Available NXXs	Total			
626 NPA	721	0	14	65	800			
Codes Assignment History	2019	2020	2021	2022	2023	2024	2025	
626 NPA	12	17	26	19	17	24	0	
Codes Assigned (Time period: 01/1/24 - 1/8/2025		Dedicated Customers	For LRNs	Total				
	23	1	0	24				
Codes Forecasted	Pool Replenishment & Dedicated Customers	LRNs	Total					
	7	0	7					
Blocks Assigned (Time period: 1/1/24 - 1/8/24)	374	Blocks Available		55				
Rate Centers	Mandatory	Mandatory Single Service Provider	Optional	Excluded	Total			
	10	0	0	0	10			
Based on the October 2024 NRUF and NPA Exhaust Analysis, the 626 NPA is projected to exhaust in 4Q2027.							ojected to	

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), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).