



November 16, 2022

Electronically Filed

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

Re: Petition on Behalf of the Michigan Telecommunications Industry by the
North American Numbering Plan Administrator, For Relief of the “313”
Numbering Plan Area

Dear Ms. Felice:

On behalf of the Michigan telecommunications industry, the North American
Numbering Plan Administrator (“NANPA”) hereby submits for filing a petition for relief
of the “313” Numbering Plan Area (“NPA”) (aka “area code”).

If you have any questions regarding this filing, please contact me at 925-420-0340.

Respectfully submitted,

Florence Weber
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**Before the
MICHIGAN PUBLIC SERVICE COMMISSION**

**In The Matter To Consider)
Implementation Of A Relief)
Plan For The 313 Numbering)
Plan Area)**

Case No. U-_____

**PETITION ON BEHALF OF THE MICHIGAN
TELECOMMUNICATIONS INDUSTRY BY THE NORTH
AMERICAN NUMBERING PLAN ADMINISTRATOR FOR
RELIEF OF THE 313 NUMBERING PLAN AREA**

On behalf of the Michigan telecommunications industry (“Industry”),¹ the North American Numbering Plan Administrator (“NANPA”), as the neutral third-party numbering plan area (“NPA”) (also referred to as “area code”) relief planner for Michigan,² hereby notifies the Michigan Public Service Commission (“Commission”)³ that the need for relief of the 313 NPA is imminent. In the *Opinion and Order* (“Order”), Case No. U-12880 issued on September 7, 2001, the Commission approved a multiple-area all-services overlay as the relief method for the 313 NPA, introducing the 679 NPA.⁴ Pursuant to the Order, the overlay was to be implemented as a multiple-area overlay with certain restrictions and requirements as described in the Order. The Order stated that when NANPA determined that the 313 area code is within 12 months of exhaust,

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 313 NPA.

² On November 30, 2020, the Federal Communications Commission awarded SomosGov, Inc. the contract to serve as the North American Numbering Plan Administrator (NANPA), replacing Neustar, Inc.

³ The Federal Communications Commission (“FCC”) delegated authority to the states to review and approve NPA relief plans. *See* 47 C.F.R. §52.19.

⁴ *In the matter, on the Commission’s own motion, to consider implementation of a 313 area code relief plan*, Opinion and Order, Case No. Case No. U-12880 (September 7, 2001) (“Order”).

NANPA shall notify the Commission and meet with the Industry to establish a schedule for implementation of permissive and mandatory dialing plans. Consistent with the Commission's Order and to update the record, NANPA hereby notifies the Commission that the 313 area code is currently projected to exhaust, absent relief, during the third quarter of 2025. After receipt of Commission approval, the Industry will take steps to implement the all-services distributed overlay approved in the Order for the 313 NPA with the customer education and technical implementation plan and schedule herein described.

I. Background

The 313 NPA was assigned to the state of Michigan in 1947 as one of the original area codes in the North American Numbering Plan (NANP). It originally served the entire southeastern quadrant of Michigan, including Metro Detroit, Flint, and part of Michigan's "Thumb." The 313 NPA has been split twice, beginning in 1993, creating the 810 NPA and then again in 1997, creating its current geographic area and the 734 NPA. The 313 NPA is bordered on the north by 248/947 and 586 NPAs, to the east by the Detroit River and Lake St. Clair, and to the south and west by the 734 NPA. The 313 NPA has six rate centers and seven-digit local dialing.

On September 7, 2001, the Commission issued an Order, Case No. U-12880, approving a multiple-area overlay as the relief method for the 313 NPA, introducing the 679 NPA.⁵ As part of the Order, the Commission concluded that the best course of action was to impose a single overlay over both the 313 and 734 area codes, issuing a

⁵ *Id.*

separate Order for the 734 NPA, Case No. U-12743.⁶ As the current projected exhaust date for the 734 NPA is first quarter 2027⁷ and the order stipulates that the multiple-area overlay over the 734 should be implemented when the 734 is near exhaust, this instant Petition addresses only the need for relief of the 313 NPA.

Subsequent to the issuance of the Order, Michigan began a number conservation measure in the 313 NPA, thousands-block number pooling, in February 2002, allowing numbers to be assigned to service providers in blocks of one thousand numbers instead of full Central Office (“CO”) codes which consists of 10 one-thousand number blocks. As a result, implementation of the new area code assigned for relief of this area, 679, was postponed until now. The new 679 NPA is still reserved and can be used as the relief area code for the 313 NPA.

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. In October 2022, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2022 NRUF Report”) which indicated that the 313 NPA would exhaust during the third quarter of 2025.⁸

While the Order contains implementation instructions to the Industry, many

⁶ *In the matter, on the Commission’s own motion, to consider implementation of a 734 area code relief plan*, Opinion and Order, Case No. U-12743 (September 7, 2001).

⁷ October 2022 NRUF and NPA Exhaust Analysis (“October 2022 NRUF Report”). The October 2022 NRUF Report can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.html.

⁸ *Id.*

factors such as customer education, dialing plan best practices, and technical milestones have changed in the two decades since the Order was approved. For example, the Order stated that 1) NANPA will notify the Commission when the 313 area code is within 12 months of exhaust to establish a schedule for the implementation of permissive and mandatory dialing; 2) the activation of the new overlay and the commencement of permissive dialing in the 313 area code should begin six months prior to CO code exhaust; 3) the Industry shall file monthly progress reports from the time that the implementation schedule is established until the date upon which the area code relief plan is fully implemented; 4) the Industry file, within 30 days and consistent with the Order, a comprehensive plan for customer education consistent with the Order; 5) provide further updates to that plan as necessary; and 6) the Industry should rely solely on 10-digit dialing (rather than a combination of 10- and 11-digit dialing) for local calls placed both within and between the 313 area code and the new overlay area code. Because so much time has elapsed since this Order was issued, the Industry requests that these requirements be changed to reflect current Industry practices for implementation of overlays and that the Commission approve the modified implementation timeframes, dialing plan, and milestones contained herein for implementation of an all-services distributed overlay of the 313 NPA.

NANPA distributed a notice to the Industry on September 27, 2022, containing a draft relief Petition for review prior to the Industry relief meeting.⁹ The Industry met on October 19, 2022, and approved this instant Petition for an all-services distributed overlay of the 313 NPA.¹⁰

⁹ NANPA's September 27, 2022 notice to the Industry is attached and incorporated as Exhibit A and contains CO code assignment information, and thousands-block pooling statistics.

¹⁰ The October 19, 2022 meeting minutes, including an associated NPA map, are attached as Exhibit B.

II. Description of the Relief Plan

The all-services distributed overlay would superimpose the previously reserved 679 NPA over the same geographic area covered by the existing 313 NPA and is projected to last approximately 46 years. NANPA will assign CO codes from the new 679 overlay NPA once all assignable CO codes from the 313 NPA are assigned. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. However, all customers will be required to dial 10 digits for local calls within and between NPAs in the affected area.

In the 20 years since the Order was issued, many customers now have subscribed to “flat rate” service plans that do not distinguish between local calls and toll calls, and customer sensitivity to “toll charges” has likely waned significantly. Many service providers provide permissive 1+10-digit dialing for local calls. Indeed, when mandatory 10-digit local dialing was recently implemented in Michigan’s 616, 810, 906 and 989 NPAs, the dialing plan implemented for local calls was 10 digits with 1+10 digits permissive at each service provider’s discretion. Relying exclusively on 10-digit dialing for local calls in the 313 and 679 NPAs may be more frustrating to customers whose 1+10-digit local calls are routed to an announcement instead of being completed. Thus, the Industry-recommended dialing plan set forth in the following table is consistent with the dialing plan recently implemented in the 616, 810, 906 and 989 NPAs:

Dialing Plan for the 313 All-Services Distributed Overlay

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

*1+10 digit permissible at each service provider's discretion. (Industry Best Practice)

The Industry reached consensus to implement the new relief NPA in accordance with a 13-month schedule, which is consistent with current Industry practices. The schedule, outlined below, does not include specific dates, but rather timeframes to identify the phases of implementation. Once the Commission has approved the instant Petition, the Industry will select specific dates at an implementation meeting to ensure the dates do not interfere with certain holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission's approval of the instant Petition and adherence to the proposed implementation timeframe schedule will allow the new NPA to be implemented six months prior to the projected exhaust of the 313 NPA¹¹ and avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

¹¹ The NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 1, 2022) ("NPA Relief Guidelines"), §7.2. The NPA Relief Guidelines can be accessed on the ATIS website located at https://access.atis.org/apps/group_public/documents.php?view=.

The Implementation Timeframe Schedule for the 313 All-Services Distributed Overlay

EVENT	TIMEFRAME
Network Preparation Period	6 Months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 313 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period.	6 Months
First Code Activation after end of Permissive dialing period. <i>(Effective date for codes from the new NPA) *</i>	1 Month (after Mandatory Dialing Implemented)
Total Implementation Interval	13 Months

**CO codes in the new NPA will not be assigned until all available codes in the existing 313 NPA are exhausted.*

After the Commission issues a final decision, NANPA will take approximately 75 days to work with the Commission to issue a press release announcing the new 679 NPA, schedule and facilitate an Industry implementation meeting, and publish a Planning Letter. The Industry will form an implementation committee to begin implementation of the new area code approximately 19 months prior to exhaust of the 313 NPA.¹²

The following table outlines the methods and processes the Industry typically utilizes in current relief projects for implementation of an initial overlay when 7-digit local dialing is in place necessitating a permissive dialing period for both 7- and 10-digit local dialing; however, the methods and processes outlined below may be modified by agreement of the Industry members during the actual implementation meetings:

¹² The Industry needs a total of 19 months to complete a 13-month implementation schedule and implement area code relief six months prior to exhaust of the 313 NPA.

Customer Education Milestones:

Action	Responsibility
1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release	Commission: Service Providers to the extent they are able to do so
3 Send Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	Co-chairs of industry committee
4 Update social media with information regarding new overlay NPA.	All Service Providers (optional)
5 Update websites with information regarding new overlay NPA	All Service Providers
6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	Service Providers that publish directories
<u>After Permissive 7 and 10-Digit Dialing Begins</u>	
7 Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
8 Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	Co-chairs of industry committee
9 Update social media with information regarding new overlay NPA.	All Service Providers (optional)
10 Update websites with information regarding new overlay NPA	All Service Providers
11 Issue second mandatory press release just prior to the new overlay NPA's effective date	Commission: Service Providers to the extent they are able to do so

Technical Milestones:

Action	Responsibility
1 Obtain industry test code from NANPA and activate the test	One Service Provider volunteer

Action	Responsibility
number	
2 Open the test code in carriers' network	All Service Providers
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.)	All Service Providers
4 Ensure Highway boxes are programmed with 10-digit dialing	Co-chairs of industry committee
5 Network ready for Permissive Dialing	All Service Providers
6 Create Permissive Dialing Industry Contact List	Co-chairs of industry committee
<u>Permissive Dialing Begins</u>	
7 Establish NPA Specific type of Trunks	All Service Providers (if needed)
8 Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Service Providers
11 Recorded announcements in Place and Tested	All Service Providers
<u>E911 Work Plan</u>	
12 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13 Ensure SRDB table has new NPA built	E911 Providers
14 Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (if needed)
16 Update PSAP equipment to recognize new NPA	PSAPs

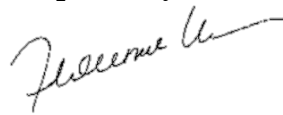
Action	Responsibility
17 Trunk Orders Complete	All Service Providers (if needed)
18 Build E911 Network/Tandem Translations	E911 Providers
19 Verify if all PSAP work has been completed	E911 Providers

III. Conclusion

The Industry requests that the Commission issue an order in response to the instant Petition approving the recommended implementation plan for the all-services distributed overlay relief plan previously approved by the Commission for the 313 NPA. To the extent possible, the Industry requests that the Commission

forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted the instant Petition, the Industry will implement the 679 NPA all-services distributed overlay over the 313 NPA in accordance with the implementation schedule set forth above. As such, the Industry respectfully requests that the Commission grant this Petition no later than May 31, 2023.

Respectfully submitted,



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November 16, 2022

EXHIBIT A



September 27, 2022

To: All 313 NPA Code Holders and Interested Industry Members (Michigan)

Subject: Michigan 313 NPA Draft Relief Petition Review

The North American Numbering Plan Administrator (“NANPA”) is responsible for initiating area code relief in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented in accordance with the NPA Code Relief Planning and Notification Guidelines (“Guidelines” ATIS-0300061). The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA, projects the exhaust of the 313 NPA during the third quarter of 2025.

In the *Opinion and Order* (“Order”), Case No. U-12880 issued on September 7, 2001, the Michigan Public Service Commission (“Commission”) approved an all-services overlay as the relief method for the 313 NPA as part of a multiple-area all-services overlay to ultimately include the 734 NPA as addressed independently in Case No. U-12743. The Order stated that when NANPA determined that the 313 area code is within 12 months of exhaust, NANPA shall notify the Commission and meet with the Michigan Telecommunications Industry (“Industry”) to establish an implementation schedule and dialing plan. Because so much time has elapsed since the Order was issued, the implementation timeframes and milestones will need to be modified for the implementation of an all-services distributed overlay of the 313 NPA to be consistent with Industry guidelines and best practices.

Accordingly, on October 19, 2022, NANPA will convene an Industry NPA relief planning meeting to review and approve an updated draft relief petition to submit to the Commission to update the implementation timeframes and milestones when implementing the new 679 NPA to overlay the 313 NPA. Included with this meeting notice is the meeting agenda, consensus process, the Commission Order, CO code summary, Thousands-block status report, relief planning meeting aids and the draft relief petition.

Because the impacts of NPA relief are so significant, NANPA strongly urges your participation on October 19, 2022. This may be the only meeting of the industry before a decision is reached on the relief petition that will be submitted to the Commission for approval. The details of the relief planning meeting are as follows:

Date: Wednesday, October 19, 2022

Time: 1:00 pm, ET; 12:00 pm CT; 11:00 am MT; 10:00 am PT

Join Zoom Meeting:

<https://somos.zoom.us/j/89462758131?pwd=ZXBXYVNiazZzRjBqRnBQRm0xSUFWUT09&from=addon>

Meeting ID: 894 6275 8131

Password: 046437

One tap mobile

8884754499,,89462758131# US Toll-free

8778535257,,89462758131# US Toll-free

Dial by your location

888 475 4499 US Toll-free

877 853 5257 US Toll-free

Meeting ID: 894 6275 8131

If you would like to receive any of the documents in Word format for editing purposes, please contact me prior to the scheduled web meeting. If you have any questions, please give me a call at (925) 420-0130 or via email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe

NPA Relief Planner

NANPA

cc: Joshua McConkie – Michigan Public Service Commission

Wendy Thelen – Michigan Public Service Commission

**MICHIGAN 313 NPA
DRAFT RELIEF PETITION REVIEW
INDUSTRY MEETING
VIA WEB CONFERENCE**

October 19, 2022 - 1:00 PM (ET)

AGENDA

Welcome, Introductions & Agenda Review

Review Consensus Process

Review Case No. U-12880

Review 313 NPA Status

Review of the Draft Relief Petition

Consensus on Implementation Intervals

Consensus on Customer Education and Technical Milestones

Consensus on Approval and Filing

Set Date to Approve Minutes

Open Discussions

Adjourn

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.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion,)	
to consider implementation of a 313 area code)	Case No. U-12880
relief plan.)	
_____)	

At the September 7, 2001 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Laura Chappelle, Chairman
Hon. David A. Svanda, Commissioner
Hon. Robert B. Nelson, Commissioner

OPINION AND ORDER

I.

HISTORY OF PROCEEDINGS

The 1999 Central Office Code Utilization Survey's projected demand for new central office codes (frequently referred to as NXX codes) indicated that the still-available NXX codes in the 313 area code could be exhausted by the first quarter of 2000. Based upon the projected exhaustion date and an unanticipated increase in the demand for NXX codes within the 313 area code, the North American Numbering Plan (NANP) Administrator, which is currently NeuStar, Inc.,¹ notified the Commission and the telecommunications industry, on May 28, 1999, that relief planning for the 313 area code needed to be addressed as soon as possible. Following discussions both among its members and with NeuStar, the industry determined that, based on changes in the

¹In late 1999, all NANP and other numbering functions were transferred from Lockheed Martin, IMS, Inc., to NeuStar.

rate of assignment of central office codes and updated forecasts, the exhaustion of NXX codes within the 313 area code could be delayed until the first quarter of 2002.

On July 14, 1999, members of the industry met with NeuStar to discuss long-term relief alternatives for the 313 area code. Those alternatives included proposals to implement various geographic splits or overlays.² As a result of that meeting, and on behalf of both itself and the industry, NeuStar prepared a petition for 313 area code relief (the petition) in which an all-services distributed overlay was recommended as the preferred means of relief.

Because the statutes then in effect did not allow the Commission to assert jurisdiction over the proposed area code relief plan, on April 20, 2000, NeuStar submitted the petition to the Federal Communications Commission (FCC) for review and approval. However, on July 17, 2000, Governor John Engler signed into law Public Act 295 of 2000, which amended the Michigan Telecommunications Act, 1991 PA 179, as previously amended, MCL 484.2101 et seq. (the Act). Among other things, those amendments granted the Commission authority to address proposed area code changes in Michigan. In light of that extension of the Commission's authority, the FCC forwarded the petition--and, with it, all issues relating to the potential 313 area code relief plan--to the Commission for its consideration by letter dated July 28, 2000.

On March 29, 2001, having dealt with even more time-sensitive requests for area code relief in other parts of Michigan, the Commission issued an order in this case setting public hearings on the 313 area code relief plan for April 30, 2001 in Detroit and May 31, 2001 in Grosse Pointe. The Commission's order also provided an opportunity for interested persons to file written comments.

²A geographic split refers to situations in which the geographic area served by an area code in which there are few or no NXX codes left for assignment is split into two or more geographic parts, each with a separate area code. In contrast, an overlay provides relief by opening up a new area code covering the same geographic area as the area code requiring relief.

II.

DISCUSSION

The Petition

In its petition, NeuStar explained that the industry examined five alternatives for 313 area code relief. The first of these was an all-services distributed overlay that would establish a new area code covering the same geographic area as the 313 area code. Under this proposal, all existing customers would retain their existing telephone numbers, including their 313 area code. Once any still-available NXX codes in the 313 area code were exhausted, new customers requesting any type of service (landline, cellular, paging, fax, etc.) would be assigned the new area code. However, as is the case with every all-services distributed overlay, this alternative would necessitate customers dialing either 10 digits (the area code plus the 7-digit local number) or 11 digits (1 plus the 10-digit number) in order to complete a local call.³

The second alternative involved a geographic split of the existing 313 area code. Under this alternative, the two zones comprising the northwestern corner of the 313 area code (designated in the petition as “Area A”) would be separated from the other four zones lying to their south and east (designated as “Area B”). Although this alternative would allow for the continuation of 7-digit dialing for calls within each area, it would necessitate 10- or 11-digit dialing from one area to the other and would require existing customers located in one of those areas to change their phone numbers in recognition of their new area code.

The third and fourth alternatives consisted of proposals to establish an all-services distributed overlay that would simultaneously cover more than one area code. According to the petition, the

³This requirement, established by the FCC in its Second Report and Order on Local Competition, 11 FCC Rcd at 19518, is based on the assumption that dialing parity is necessary to preserve competition between carriers assigned numbers in the underlying area code and those assigned numbers in the overlay area code.

third alternative could be used to concurrently solve all NXX code exhaustion problems then existing in the 248 and 313 area codes by superimposing one new area code on both of those regions. The petition went on to indicate that the fourth alternative, which would cover the 248, 313, and 734 area codes with a single overlay, would produce a similar result, albeit over a larger region.⁴ However, the Commission's April 17, 2001 order in Case No. U-12721 subsequently established a separate overlay for the 248 area code. Thus, the multiple-area overlay proposed as the third alternative now duplicates the first alternative (an overlay encompassing only the 313 area code) and the fourth alternative would cover only the 313 and 734 regions.

Finally, the fifth alternative mentioned in the petition was to establish a new area code within the 313 region that would apply only to wireless customers. Nevertheless, the petition indicated that NeuStar and the industry members promptly eliminated this alternative from consideration on the grounds that current FCC regulations ban the use of technology-specific overlays.

The petition went on to recommend adopting the first alternative, namely the all-services distributed overlay covering only the 313 area code. According to NeuStar, this recommendation was based on the fact that, having been split to the point where it now covers little more than the City of Detroit, the 313 area code "currently is divided into the smallest practical area without dividing communities of interest." Petition, p. 5. Moreover, NeuStar continued, implementing an overlay in this situation will "minimize customer confusion and [will] not require customers to change their telephone numbers." Id.

⁴The 248 area code covers the area adjacent to and northwest of the 313 region, while the 734 area code is located directly west of the 313 area code.

Comments

A total of four parties made statements at the April 30 and May 31, 2001 public hearings. In addition, 13 written comments were submitted for the Commission's consideration.

Among the members of the industry that provided comments in this proceeding, as well as a handful of the private citizens and associations that weighed in on this issue, there was strong support for implementing one of the all-services distributed overlays described in the petition. This support was based largely on the fact that overlays (1) are easier, and thus substantially faster, to implement than geographic splits, (2) require no customers to change their current telephone numbers, (3) avoid dividing communities of interest into progressively smaller areas, (4) make it significantly easier to provide future area code relief through the application of additional overlays, if needed, and (5) provide more flexibility when implementing number conservation. With regard to this last factor, Verizon Wireless noted that with an overlay in place, number conservation measures like NXX code reclamation and thousands-block number pooling "can, in effect, work retroactively." Comments of Verizon Wireless, p. 5. Finally, Ameritech Michigan asserted that Section 303(5) of the Act, MCL 484.2303(5), does not require adjusting the 313 area code's boundaries to conform to county lines because it is not "technically and economically feasible" to split or reconfigure the area code in that manner.

As for the other parties, their comments ran the gamut from supporting splits (on the grounds that overlays would confuse customers by breaking the traditional link between area codes and geographic territories) to recommending the implementation of a technology-specific overlay (which, as noted earlier, is currently barred by FCC regulation). Some even indicated that it might be best to reject all overlay and split proposals, thus leaving the Commission to rely solely on such

things as thousands-block number pooling and rate center consolidation to remedy the current NXX code exhaustion problem in the 313 area code.

Conclusion

Notwithstanding their proponents' respective assertions to the contrary, two of the proposals offered in this case must be rejected on legal or practical grounds.

First, although their implementation (both in the past and the present) may well have been the best, least-disruptive method for dealing with the exhaustion of NXX codes throughout the country, the use of technology-specific overlays is currently banned by the FCC. Specifically, FCC regulations concerning area code relief state, in pertinent part, that:

No area code overlay may be implemented unless all central office codes in the new overlay area are assigned to those entities requesting assignment on a first-come, first-serve basis, regardless of the identity of, technology used by, or type of service provided by that entity. No group of telecommunications carriers shall be excluded from assignment of central office codes in the existing area code, or be assigned such codes only from the overlay area code, based solely on that group's provision of a specific type of telecommunications service or use of a particular technology.

47 CFR § 52.19(c)(3)(i) [Emphasis added]. Thus, the Commission is legally precluded from establishing a technology-specific overlay to be applied exclusively to the providers of cellular telephone or paging services, as was recommended by three of the commentors.

Second, proposals to reject all forms of area code relief and rely exclusively on numbering resource optimization efforts, such as rate center consolidation, number reclamation, and thousands-block number pooling, are neither practical nor allowed by the FCC as the sole remedy in this particular case. For example, rate center consolidation is a complex process that, because it requires the resolution of myriad technical and revenue-related issues, could take years to implement. Moreover, its benefits are primarily forward-looking (i.e., reducing future demand for NXX

codes within a geographic area), instead of providing for the quick recapture of stranded codes. Likewise, number reclamation is a relatively slow process. This is reflected by the fact that, despite extensive Commission efforts, only nine additional NXX codes have been reclaimed to date in the 313 area code. Finally, although the FCC recently granted the Commission's request for additional delegated authority to implement mandatory thousands-block number pooling for both the Detroit and Grand Rapids areas, it went on to reassert that the Commission cannot use pooling (either alone or in conjunction with other numbering resource optimization measures) in lieu of timely area code relief. Rather, the FCC indicated that wherever an area code is either in or approaching jeopardy (as is the case with the 313 area code), the Commission must, at a minimum, approve an area code relief proposal to serve as a "back-up [plan] . . . in the event that the pooling trial fails to alleviate the need for area code relief." Numbering Resource Optimization Order, __ FCC Rcd __, DA 01-2013 (rel. Aug. 24, 2001). For these reasons, the numbering resource optimization efforts discussed above do not, by themselves, constitute an adequate response.

Thus, the Commission is effectively required to choose between ordering a geographic split or imposing some type of an all-services distributed overlay. Based on the facts of this case, the Commission finds that an overlay should be used to provide relief, if and when it is ultimately needed, in the 313 area code. It reaches this conclusion for the following three reasons.

First, the previous geographic splits undertaken in this region have resulted in a very compact area code. Specifically, although the 313 area code originally covered the entire southeastern third of Michigan's lower peninsula, that region has already been divided into four separate area codes (namely, 248, 313, 734, and 810) and will be split again to add a fifth (the 586 area code) effective September 22, 2001. As a result, the 313 area code now covers less than half of a single county and its boundaries are essentially limited to the City of Detroit. Thus, as NeuStar correctly pointed

out in the petition, the region encompassed by the 313 area code has already been separated into the smallest practical area without dividing communities of interest.

Second, research indicates that overlays have become much more accepted throughout the country over the last few years. As specifically noted in the Commission's April 17, 2001 order in Case No. U-12721, "nearly 75% of the pending area code relief plans approved by state commissions have been in the form of overlays." April 17, 2001 order, pp. 10-11. This is due to the fact that overlays are generally faster to implement than geographic splits and serve to make future area code relief efforts much less disruptive.

Third, overlays can accentuate the benefits derived from various numbering resource optimization programs. As correctly noted by Verizon Wireless, numbers that are ultimately freed-up through either NXX code reclamation or thousands-block number pooling can be utilized throughout the 313 area code. Thus, keeping the region covered by the 313 area code as large as possible should reduce the number of stranded NXX codes. Moreover, it increases the opportunity for customers who are assigned numbers in the new overlaid area code to switch back to a subsequently freed-up 313 number, should they so desire. If a geographic split is implemented, however, customers who have had their area code changed will no longer have access to any 313 numbers that reclamation and pooling efforts ultimately make available for use.

Having found that an all-services distributed overlay should be approved, the Commission must next determine which type of overlay (one covering only the 313 region or one concurrently applied to both the 313 and 734 area codes) makes the most sense. In resolving this issue, the Commission concludes that the best course of action is to impose a single overlay over both the 313 and 734 area codes. This conclusion, which mirrors that reached in today's order in Case No. U-12743 (concerning the 734 area code relief plan), is based on the fact that establishing a

multiple-region area code will allow for the most efficient use of numbering resources. This is because it allows the NXX codes from the new area code to be assigned to the areas of greatest need without being constrained by the boundary that currently separates the 313 and 734 area codes.

For all of these reasons, the Commission finds that the fourth area code relief alternative described in the petition, adjusted to remove the 248 region from the scope of the multiple-area overlay, should be adopted. In reaching this conclusion, the Commission is keenly aware of the inconvenience and confusion that area code relief can entail. It will therefore continue to aggressively exercise the legislative authority it was granted last summer to minimize the need for, as well as the adverse consequences arising from, future area code relief. For example, it will continue the NXX code reclamation efforts that, following issuance of its November 2, 2000 order in Case No. U-12703, have resulted in the Commission reclaiming formerly stranded codes (each containing 10,000 telephone numbers). Furthermore, in light of the FCC's recent grant of authority to this Commission to implement thousands-block number pooling, the Commission will work as expeditiously as possible to get a pooling trial under way in the 313 area code. In addition, the Commission will continue to investigate the potential use of rate center consolidation to reduce the need for future area code relief and pursue the possibility of getting the FCC to lift its ban on technology-specific overlays, all in hopes of limiting the adverse effect that future area code relief may have on customers.

Miscellaneous Issues

In addition to the question of which form of relief should be approved for use in the 313 area code, several related issues have arisen in this case.

First, Section 303(5) of the Act requires the Commission to determine whether, in the context of granting area code relief or otherwise, it can somehow modify area code boundaries to make them better conform to county lines. In this instance, the Commission agrees with assertions by Ameritech Michigan to the effect that it is neither technically nor economically feasible to split or otherwise reconfigure the 313 area code precisely along county lines. To conform to county lines, providers along the area code's boundary would have to reconstruct their networks and reconfigure their exchange boundaries. The required changes would likely be too expensive and time-consuming, as well as disruptive to customers, to justify their adoption in this instance.

Second, the Commission must address the issue of when, if ever, the 313 area code relief plan approved in this order should be put into operation. In each of its previous orders approving area code relief, the Commission resolved this issue by establishing specific implementation dates for permissive and mandatory dialing. Those dates were based, in significant part, upon NeuStar's long-range projections regarding the rate of usage of NXX codes in the respective area codes. Nevertheless, the Commission finds that it should depart from that past practice. This is due to the FCC's recent grant of additional delegated authority to implement mandatory thousands-block number pooling in the 313 area code.

As noted earlier, the implementation of a new area code forces customers to go through the trouble, expense, and dislocation of changing their telephone numbers or dialing patterns, or both. Thus, traditional area code relief, in the form of geographic splits or overlays, should never be implemented until it is absolutely necessary. Moreover, based on the success of pooling tests conducted in states like Illinois, New York, and Florida, it appears that the FCC's decision to allow the Commission to commence thousands-block number pooling could significantly delay the date upon which such necessity arises with regard to the 313 area code. Thus, rather than

establishing specific implementation dates at this time based on NeuStar's long-range projections (which do not account for the potential effect of pooling in the 313 area code), the Commission finds that a more flexible implementation procedure should be adopted.

Specifically, the Commission concludes that (1) NeuStar should continue to monitor both the number of available NXX codes in the 313 area code and their rate of usage, (2) if and when NeuStar determines that the 313 area code is within 12 months from actual NXX code exhaust, it should notify the Commission of that fact and meet with relevant members of the industry to establish a schedule for the implementation of permissive and mandatory dialing, (3) any implementation schedule established by NeuStar and the industry should provide for the activation of the new overlay and the commencement of permissive dialing in the 313 area code six months prior to NXX code exhaust, and (4) absent a future Commission order setting specific implementation dates, the schedule established by NeuStar and the industry should neither initiate permissive dialing before September 7, 2002 nor commence mandatory dialing prior to March 8, 2003. The Commission also concludes that all calculations of time to NXX code exhaust should be based on actual carrier usage of numbers and that NeuStar and the industry should take all reasonable steps--including the use of code rationing, if necessary--to ensure that the 313 area code does not run out of NXX codes before the new overlay has become operational. The Commission further concludes that the industry should file monthly progress reports from the time that an implementation schedule is established to the date upon which the area code relief plan is fully implemented. Moreover, the Commission directs that NeuStar's central office code administrator should refrain from issuing numbers from the new overlay area code to customers in the 313 region until all available NXX codes in the 313 area code have been assigned.

Third, comments received in this case and others indicate that a high level of confusion exists among customers concerning the effects of area code relief. Thus, to better facilitate implementation of this area code relief plan, the Commission directs the industry to file, within 30 days, a detailed plan for customer education. The plan should include training for company personnel in dealing with customer inquiries related to the area code relief plan, as well as examples of training materials that will be used to educate company personnel involved in customer relations. It should likewise address such items as bill inserts, press kits, public service announcements, and other resources that will be used to respond to customer education needs and inquiries. In addition, the plan should also identify primary contacts within each company to address area code questions. Moreover, the industry should notify the Commission of any relevant changes to the customer education plan prior to the plan's implementation.

Fourth, to further reduce the likelihood of customer confusion, the Commission also finds that the industry should rely solely on 10-digit dialing (rather than a combination of 10- and 11-digit dialing) for local calls placed both within and between the 313 area code and the new overlay area code. Relying exclusively on 10-digit dialing for local calls should help make clear to customers that they will not be assessed toll charges unless they dial 11 digits.

Fifth and finally, parties ranging from alarm service providers to 9-1-1 emergency dispatch operators expressed concern about the harmful effect that area code relief could have on public safety, as well as on their own economic well-being. However, without knowing what form of area code relief would be adopted in this order, these parties were unable to determine the exact effect that the approved relief would have and what steps could be taken to avoid or reduce any resultant harm. The Commission therefore directs all telecommunications providers within the 313 area code to enter into informal discussions with the alarm service providers and emergency

dispatch operators with which they do business, and to attempt to resolve any unique concerns or problems that may arise for those customers. If necessary, those customers may file, not less than 60 days after the issuance of this order, separate applications proposing transitional arrangements tailored to their particular circumstances.

The Commission FINDS that:

a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1992 AACCS, R 460.17101 et seq.

b. The fourth alternative 313 area code relief plan described in the petition should be approved, with certain restrictions and requirements as stated in this order, including the removal of the 248 area code from the region covered by the multiple-area overlay.

c. If and when NeuStar determines that the 313 area code is within 12 months of actual NXX code exhaust, it should notify the Commission of that fact and meet with relevant members of the industry to establish a schedule for the implementation of permissive and mandatory dialing.

d. Any implementation schedule established by NeuStar and the industry should provide for the activation of the new overlay and the commencement of permissive dialing in the 313 area code six months prior to NXX code exhaust. Absent a future Commission order setting specific implementation dates, that schedule should neither initiate permissive dialing before September 7, 2002 nor commence mandatory dialing prior to March 8, 2003.

e. The industry should file monthly progress reports from the time that the implementation schedule is established until the date upon which the area code relief plan is fully implemented.

f. The industry should file, within 30 days, a comprehensive plan for customer education consistent with this order, and should further provide updates to that plan as necessary.

g. Telecommunications service providers within the 313 area code should enter into informal discussions with all alarm service providers and emergency dispatch operators with which they do business, and should attempt to resolve any unique concerns or problems that may arise for those customers due to the potential implementation of the area code relief plan approved in this order.

THEREFORE, IT IS ORDERED that:

A. The 313 area code relief plan set out as the fourth alternative in the petition filed by NeuStar, Inc., namely the implementation of a multiple-area all-services distributed overlay, is approved with certain restrictions and requirements as described in this order, including the removal of the 248 area code from the region covered by the multiple-area overlay.

B. If and when NeuStar, Inc., determines that the 313 area code is within 12 months of actual central office code exhaust, it shall notify the Commission of that fact and meet with relevant members of the industry to establish a schedule for the implementation of permissive and mandatory dialing.

C. Any implementation schedule established by NeuStar, Inc., and the industry shall provide for the activation of the new overlay and the commencement of permissive dialing in the 313 area code six months prior to central office code exhaust. Absent a future Commission order setting specific implementation dates, that schedule shall neither initiate permissive dialing before September 7, 2002 nor commence mandatory dialing prior to March 8, 2003.

D. The industry shall file monthly progress reports from the time that the implementation schedule is established until the date upon which the area code relief plan is fully implemented.

E. The industry shall file, within 30 days, a comprehensive plan for customer education consistent with this order, and shall further provide updates to that plan as necessary.

F. Telecommunications service providers within the 313 area code shall enter into informal discussions with all alarm service providers and emergency dispatch operators with which they do business, and shall attempt to resolve any unique concerns or problems that may arise for those customers due to the potential implementation of the area code relief plan approved in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ Laura Chappelle

Chairman

(S E A L)

/s/ David A. Svanda

Commissioner

/s/ Robert B. Nelson

Commissioner

By its action of September 7, 2001.

/s/ Dorothy Wideman

Its Executive Secretary

F. Telecommunications service providers within the 313 area code shall enter into informal discussions with all alarm service providers and emergency dispatch operators with which they do business, and shall attempt to resolve any unique concerns or problems that may arise for those customers due to the potential implementation of the area code relief plan approved in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

Chairman

Commissioner

Commissioner

By its action of September 7, 2001.

Its Executive Secretary

In the matter, on the Commission's own motion,)
to consider implementation of a 313 area code)
relief plan.)
_____)

Case No. U-12880

Suggested Minute:

“Adopt and issue order dated September 7, 2001 approving, with certain restrictions and requirements, the petition filed by NeuStar, Inc., to provide future 313 area code relief through the implementation of an all-services distributed overlay, as set forth in the order.”

Central Office Code Summary

<u>NPA</u>	<u>313</u>					
Assigned NXXs	733					
Reserved NXXs	0					
Unavailable NXXs	16					
Available NXXs	51	See Note				
Total	800					
<u>Codes Assignment History</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
313 NPA	4	9	13	15	20	13*
*As of September 27, 2022						
Exhaust:	Based on the April 2022 NRUF, the 313 NPA is projected to exhaust in 3Q2025.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	MI 313
MEETING DATE:	10/19/2022
POOL START DATE (PSD)	2/24/2002
RATE CENTERS	

# Total	6
# Mandatory	6
# Mandatory-Single Service Providers (M*)	0
# Optional	0
# Excluded	0
BLOCKS ASSIGNED	
# Total	187
<i>(For time period 11/01/21 - 9/27/22)</i>	
BLOCKS AVAILABLE	
#Total	59
<i>(As of preparation date: 9/27/22)</i>	
CODES ASSIGNED	
# Total	18
# for Pool Replenishment	17
# for Dedicated Customers	0
# for LRNs	1
<i>(For time period 11/01/21 - 9/27/22)</i>	
CODES FORECASTED	
# Total	12
# for Pool Replenishment and Dedicated Customers	12
# for LRNs	0
<i>(For the next twelve months as of: 9/27/22)</i>	

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 customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding new overlay NPA.	
		5 Update websites with information regarding new overlay NPA	
		6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	
		<u>After Permissive 7 and 10-Digit Dialing Begins</u>	
		7 Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	
		9 Update social media with information regarding new overlay NPA.	
		10 Update websites with information regarding new overlay NPA	
		11 Issue second (mandatory) press release just prior to the new overlay NPA's effective date	

Relief Planning Meeting Aid

Customer Education and Technical Milestones

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 boxes are programmed with 10-digit dialing	
		5 Network ready for Permissive Dialing	
		6 Create Permissive Dialing Industry Contact List	
		<u>Permissive Dialing Begins</u>	
		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-digit dialing	
		11 Recorded announcements in Place and Tested	
		<u>E911 Work Plan</u>	
		12 Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	
		13 Ensure SRDB table has new NPA built	
		14 Notify PSAPs, PSALI customers and County Coordinators	
		15 Review and Submit CLEC Trunk Order Requests to local provider if needed	
		16 Update PSAP equipment to recognize new NPA	

Relief Planning Meeting Aid

Customer Education and Technical Milestones

		17 Trunk Orders Complete	
		18 Build E911 Network/Tandem Translations	
		19 Verify if all PSAP work has been completed	
		20 Activate E911 Network/Tandem Translations	

The above are the typical milestones necessary for implementation of an all-services distributed overlay; however, these may need to be modified during the actual implementation.

EXHIBIT B



November 3, 2022

To: All 313 NPA Code Holders and Interested Industry Members (Michigan)

Subject: Final Minutes of the Petition Review Meeting for the 313 NPA

Attached are the final minutes from the October 19, 2022, Michigan 313 NPA Petition Review meeting. These minutes became final on November 3, 2022.

If you have any questions, please give me a call at (925) 420-0130 or contact me by email at cmccabe@nanpa.com.

Sincerely,

Cecilia McCabe
NPA Relief Planner
NANPA

cc: Joshua McConkie – Michigan Public Service Commission
Wendy Thelen – Michigan Public Service Commission

**MICHIGAN 313 NPA
RELIEF PETITION REVIEW MEETING
VIA WEB CONFERENCE
FINAL MINUTES
October 19, 2022**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Cecilia McCabe, NPA Relief Planner, North American Numbering Plan Administrator (“NANPA”) welcomed the participants and reviewed the objectives of the meeting. A list of attendees can be found in Attachment #1. The meeting agenda and other documents were displayed to the meeting participants using Zoom™.

REVIEW CONSENSUS PROCESS

Cecilia stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed for the meeting. The consensus process was reviewed, and an explanation was provided for how consensus is determined. In addition, it was mentioned that the minutes from the meeting would be comprised of consensus agreements and any issues not captured by consensus could be expressed in the form of a Statement for the Record at any time during the meeting.

NANPA’s ROLE AND RESPONSIBILITIES

NANPA commonly starts the relief planning process 36 months prior to the exhaust of the Numbering Plan Area (“NPA”). The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA, projects the exhaust of the 313 NPA during the third quarter of 2025.

Cecilia reviewed NANPA’s role and responsibilities are as follows:

- NANPA is to distribute the meeting notice with the draft application at least three weeks prior to the initial relief planning meeting, which was completed on September 27, 2022.
- The main objective is achieved by reaching consensus on the relief filing to be submitted to the Michigan Public Service Commission (“Commission”).
- Determine any additional items to include in the application such as the implementation intervals and customer education and technical milestones.
- NANPA is then charged with the responsibility of filing the petition for relief, on behalf of the Telecommunications Industry of Michigan (“Industry”), with the Commission. Once the Industry comes to consensus on what should be included in the relief filing, NANPA will file the legal document within six weeks of today’s meeting per the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 1, 2021) (“Guidelines”) or as decided by the Industry or as required by the state statute.

BACKGROUND OF 313 NPA

Cecilia stated that the 313 NPA was assigned in 1947 as one of the original 86 area codes. It originally served the southeast portion of Michigan but due to demand for numbers, the 810 NPA was created and split off in 1993 and the 734 NPA was created and split off in 1997. Currently, the 313 NPA serves Detroit and suburbs located in Wayne County.

Cecilia stated that NPA relief planning had begun in 1999 and in *Opinion and Order* (“Order”), Case No. U-12880 issued on September 7, 2001, the Commission approved an all-services distributed overlay as the relief method for the 313 NPA as part of a multiple-area all-services overlay to ultimately include the 734 NPA as addressed independently in Case No. U-12743. The 679 NPA was assigned by NANPA to overlay both the 313 and 734 NPAs. The Order stated that when NANPA determined that the 313 area code is within 12 months of exhaust, NANPA shall notify the Commission and meet with the Industry to establish an implementation schedule. Due to a reduction in demand and the implementation of thousands-block number pooling, the need for relief was delayed until now. Because so much time has elapsed since the Order was issued, the implementation timeframes and milestones typically used by the Industry have changed and the participants today will make a recommendation for an amended implementation timeline of an all-services distributed overlay of the 313 NPA to be consistent with Industry guidelines and best practices.

REVIEW ORDER

Cecilia reviewed the findings and ordering clauses in the Order which state:

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission’s Rules of Practice and Procedure, as amended, 1992 AACCS, R 460.17101 et seq.*
- b. The fourth alternative 313 area code relief plan described in the petition should be approved, with certain restrictions and requirements as stated in this order, including the removal of the 248 area code from the region covered by the multiple-area overlay.*
- c. If and when NeuStar determines that the 313 area code is within 12 months of actual NXX code exhaust, it should notify the Commission of that fact and meet with relevant members of the industry to establish a schedule for the implementation of permissive and mandatory dialing.*
- d. Any implementation schedule established by NeuStar and the industry should provide for the activation of the new overlay and the commencement of permissive dialing in the 313 area code six months prior to NXX code exhaust. Absent a future Commission order setting specific implementation dates, that schedule should neither initiate permissive dialing before September 7, 2002 nor commence mandatory dialing prior to March 8, 2003.*
- e. The industry should file monthly progress reports from the time that the implementation schedule is established until the date upon which the area code relief plan is fully implemented.*
- f. The industry should file, within 30 days, a comprehensive plan for customer education consistent with this order, and should further provide updates to that plan as necessary.*
- g. Telecommunications service providers within the 313 area code should enter into informal discussions with all alarm service providers and emergency dispatch operators with which they do business, and should attempt to resolve any unique concerns or problems that may arise for those customers due to the potential implementation of the area code relief plan approved in this order.*

THEREFORE, IT IS ORDERED that:

- A. The 313 area code relief plan set out as the fourth alternative in the petition filed by NeuStar, Inc., namely the implementation of a multiple-area all-services distributed overlay, is approved with certain restrictions and requirements as described in this order, including the*

removal of the 248 area code from the region covered by the multiple-area overlay.

B. If and when NeuStar, Inc., determines that the 313 area code is within 12 months of actual central office code exhaust, it shall notify the Commission of that fact and meet with relevant members of the industry to establish a schedule for the implementation of permissive and mandatory dialing.

C. Any implementation schedule established by NeuStar, Inc., and the industry shall provide for the activation of the new overlay and the commencement of permissive dialing in the 313 area code six months prior to central office code exhaust. Absent a future Commission order setting specific implementation dates, that schedule shall neither initiate permissive dialing before September 7, 2002 nor commence mandatory dialing prior to March 8, 2003.

D. The industry shall file monthly progress reports from the time that the implementation schedule is established until the date upon which the area code relief plan is fully implemented.

E. The industry shall file, within 30 days, a comprehensive plan for customer education consistent with this order, and shall further provide updates to that plan as necessary.

F. Telecommunications service providers within the 313 area code shall enter into informal discussions with all alarm service providers and emergency dispatch operators with which they do business, and shall attempt to resolve any unique concerns or problems that may arise for those customers due to the potential implementation of the area code relief plan approved in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

CENTRAL OFFICE (“CO”) CODE STATUS

As of October 18, 2022, the 313 NPA had 736 CO codes assigned, 48 CO codes available for assignment, and 16 unavailable CO codes. (See Attachment #2)

THOUSANDS-BLOCK INFORMATION

Cecilia reported that in the 313 NPA, pooling commenced on February 24, 2002, and there are six (6) rate centers which are all mandatory for pooling. From the period of November 1, 2021, to October 18, 2022, 203 blocks have been assigned and 21 CO codes have been assigned: 20 for pool replenishment and one (1) for an LRN. As of October 18, 2022, there are 63 blocks available for assignment to service providers. The forecasted demand for the next twelve months is 14 CO codes for pool replenishment and dedicated customers. (See Attachment #3)

NPA EXHAUST

The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA, projects the exhaust of the 313 NPA during the third quarter of 2025. Cecilia also stated that the 734 NPA is projected to exhaust during the first quarter of 2028.

The petition will be updated to include the Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2022 NRUF Report”) current exhaust projections, if they have changed, prior to filing the petition with the Commission.

Cecilia also reviewed a rate center map of the 313 NPA and stated that it would be included with the meeting minutes as an attachment. (See Attachment #4)

REVIEW OF THE RELIEF PETITION

Cecilia mentioned that prior to today's meeting, recommended edits were submitted by an Industry member for the draft relief petition which was distributed on September 27, 2022.

On page 1, the relief petition described the need for relief in the 313 NPA and reviewed the background which included the Order, Case No. U-12880 issued on September 7, 2001.

There were no edits on page 1.

On page 2, a background of the 313 NPA was listed as well as a description of the NPAs that border the 313 NPA.

There were no edits on page 2.

On page 3, the background was continued and the projected exhaust date was described. An edit was added to include dialing plan best practices as a factor to consider.

All submitted edits were accepted on page 3.

On page 4, a summary of the Order findings and ordering clauses were listed. An addition was added to include the dialing plan description from the body of the Order.

All submitted edits were accepted on page 4.

On page 5, a description of the relief plan and the dialing plan were reviewed. An edit was made to include current dialing plan practices which allow for 1+10-digit local dialing permissible at each service provider's discretion.

All submitted edits were accepted on page 5.

On pages 6 and 7, the relief petition provided the Industry recommended 13-month implementation schedule.

All submitted edits were accepted on pages 6.

On page 7, the customer education and technical milestones were reviewed, and consensus was reached on those to include in the petition.

All submitted edits were accepted on page 7.

On pages 7 and 8, the conclusion was reviewed in which consensus was reached to request that to the extent possible, the Commission grant the petition no later than May 31, 2023.

All submitted edits were accepted on page 8.

CONSENSUS ON DIALING PLAN

The participants reached consensus on the following dialing plan:

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

*1+10 digit permissible at each service provider's discretion. (Industry Best Practice)

Wendy Thelen of the Commission asked whether the 248/947 NPA overlay allows for 1+10-digit local dialing and if there is a technical reason that only allowing 10-digit local dialing would be an issue? Cecilia stated that the 248/947 NPA overlay did not allow for 1+10-digit local dialing to be permissible. Dana Crandall, Verizon Wireless, responded that Verizon Wireless allows 1+10-digit local dialing and it would be a burden to restrict to only 10-digit local dialing for both Verizon Wireless and consumers. Sharon Poer, AT&T, stated that the wireless side of AT&T has the same practice of allowing 1+10-digit local dialing as permissible and agrees that it would be a burden to restrict.

CONSENSUS ON IMPLEMENTATION INTERVALS

Cecilia stated that because of the time elapsed since the Order was issued, the Industry may want to revise the implementation intervals to be consistent with current best practices. After discussion on a suggested implementation schedule, consensus was reached on a 13-month implementation schedule as follows:

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within existing NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period (Effective date for codes from the new 679 NPA) *	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

*CO codes in the new NPA will not be assigned until all available codes in the 313 NPA have been exhausted.

CUSTOMER EDUCATION AND TECHNICAL MILESTONES:

A recommendation was made, and consensus was reached to include the following *Customer Education and Technical Milestones* for the 313 NPA All-Services Distributed Overlay implementation.

Customer Education Milestones:

	Responsibility
1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release	Commission; Service Providers to the extent they are able to do so
3 Send Special letters to PSAPs and Directory Publishers	Co-chairs of industry committee
4 Update social media with information regarding new 679 overlay NPA.	All Service Providers (optional)
5 Update websites with information regarding new 679 overlay NPA	All Service Providers
6 Develop language for use in Directories to alert the consumers of 10-digit local dialing and the new area code	Service Providers that publish directories
<u>After Permissive 7 and 10-Digit Dialing Begins</u>	
7 Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
8 Send reminder Special letters to Alarm and Safety, Directory Publishers, Pay Telephone & PSAPs	Co-chairs of industry committee
9 Update social media with information regarding new 679 overlay NPA.	All Service Providers (optional)
10 Update websites with information regarding new 679 overlay NPA	All Service Providers
11 Issue second mandatory press release just prior to the new overlay NPA's effective date	Commission; Service Providers to the extent they are able to do so

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 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.)	All Service Providers
4 Ensure Highway boxes are programmed with 10-digit dialing	Co-chairs of industry committee
5 Network ready for Permissive Dialing	All Service Providers

6	Create Permissive Dialing Industry Contact List	Co-chairs of industry committee
	<u>Permissive Dialing Begins</u>	
7	Establish NPA Specific type of Trunks	All Service Providers (if needed)
8	Completion of 10-digit signaling transition between carriers' networks	All Service Providers
9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed	All Service Providers
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Service Providers
11	Recorded announcements in Place and Tested	All Service Providers
	<u>E911 Work Plan</u>	
12	Confirm new Emergency Service Number (ESN)/Numbering Plan Digit (NPD) has been established for the new NPA	E911 Providers
13	Ensure SRDB table has new NPA built	E911 Providers
14	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
15	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (if needed)
16	Update PSAP equipment to recognize new NPA	PSAPs
17	Trunk Orders Complete	All Service Providers (if needed)
18	Build E911 Network/Tandem Translations	E911 Providers
19	Verify if all PSAP work has been completed	E911 Providers
20	Activate E911 Network/Tandem Translations	E911 Providers

The above are the typical milestones necessary for implementation of an initial all-services distributed overlay; however, these may need to be modified during the actual implementation.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will file the petition for relief with the Commission informing them of the outcome of this relief planning meeting. The Guidelines require the petition be filed within 6-weeks (no later than November 30, 2022) of the initial relief planning meeting unless otherwise decided by the Industry.

STATEMENTS FOR THE RECORD / OPEN DISCUSSION

Josh McConkie asked when the Co-chairs of the Industry Implementation Committee would be identified. Cecilia stated that after an approved Order is issued by the Commission, the Industry would form the Implementation Committee by having two volunteers host as Co-chairs.

There were no statements for the record.

REVIEW OF DRAFT MEETING MINUTES

It was agreed that the draft minutes resulting from this meeting will be distributed to the Industry by posting them on the NANPA website no later than November 2, 2022. Additionally, the Industry agreed that no meeting will be held to approve the draft minutes, but rather the Industry is to provide corrections or changes to Cecilia McCabe via email at cmccabe@nanpa.com or at 925-420-0130. Any changes to the minutes should be provided no later than one week after the minutes are posted to the NANPA website, when the minutes will become final.

Once the relief petition is approved by the Commission, the implementation phase of the project as described in sections 5.7-5.12 of the NPA Relief Planning and Notification Guidelines will begin with NANPA hosting the implementation meeting and issuing the Planning Letter.

The meeting was adjourned.

#

These minutes became final on November 3, 2022.

**Michigan 313 NPA
Petition Review Meeting via Web Conference
October 19, 2022
Participants**

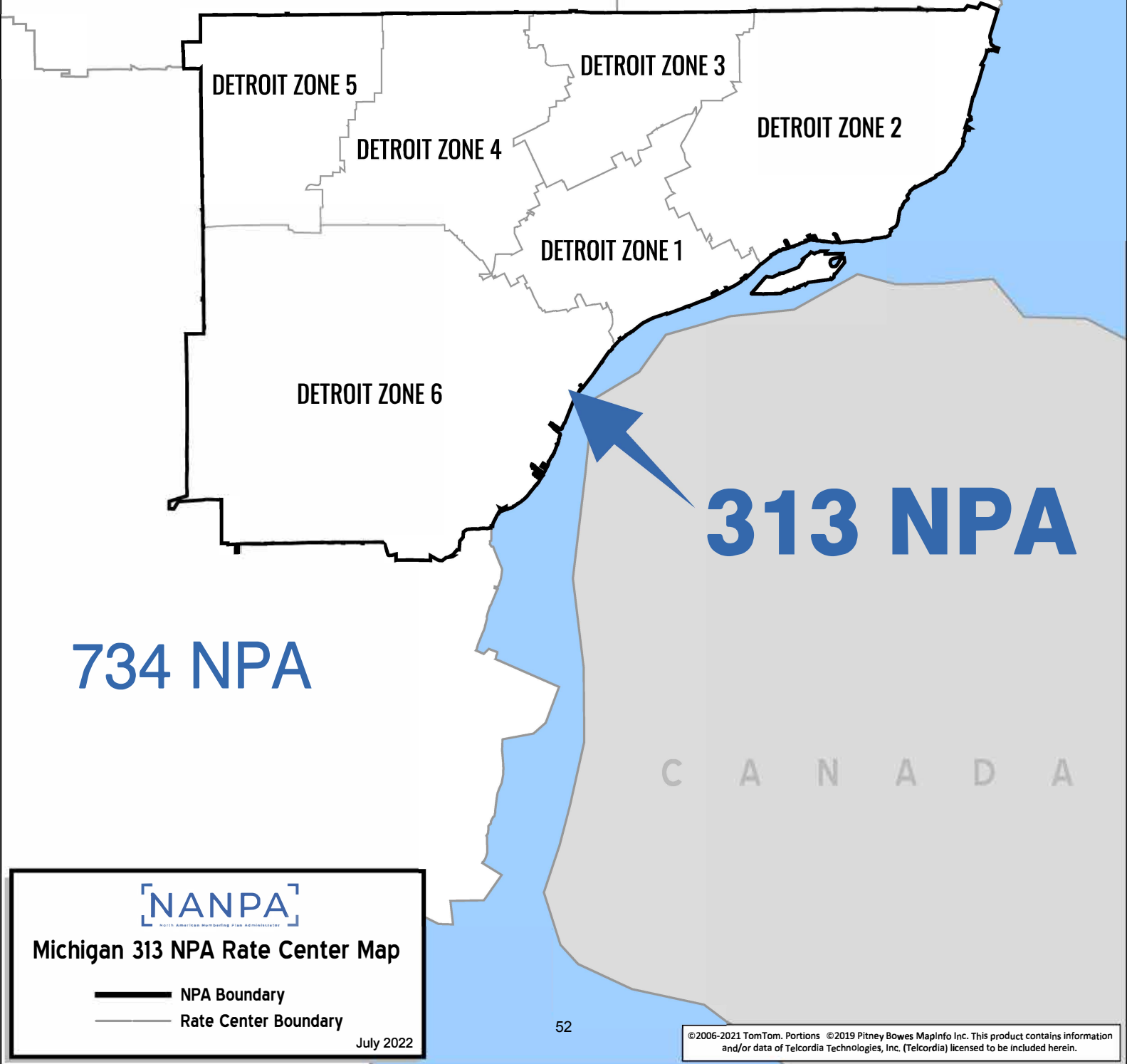
NAME	COMPANY
Sharon Poer	AT&T
Rita Schmitz	CenturyLink/Lumen
Matt Nolan	Charter Communications
Josh McConkie	Michigan Public Service Commission
Wendy Thelen	Michigan Public Service Commission
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Anne Chism	TDS
Karen Riepenkroger	T-Mobile
Shaunna Forshee	T-Mobile
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless
Scott Terry	Windstream

Central Office Code Summary						
<u>NPA</u>	<u>313</u>					
Assigned NXXs	736					
Reserved NXXs	0					
Unavailable NXXs	16					
Available NXXs	48	See Note				
Total	800					
<u>Codes Assignment History</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
313 NPA	4	9	13	15	20	16*
*As of October 18, 2022						
Exhaust:	Based on the April 2022 NRUF, the 313 NPA is projected to exhaust in 3Q2025.					
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	MI 313
MEETING DATE:	10/19/2022
POOL START DATE (PSD)	2/24/2002
RATE CENTERS	
<i># Total</i>	6
<i># Mandatory</i>	6
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	203
<i>(For time period 11/01/21 - 10/18/22)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	63
<i>(As of preparation date: 10/18/22)</i>	
CODES ASSIGNED	
<i># Total</i>	21
<i># for Pool Replenishment</i>	20
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	1
<i>(For time period 11/01/21 - 10/18/22)</i>	
CODES FORECASTED	
<i># Total</i>	14
<i># for Pool Replenishment and Dedicated Customers</i>	14
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 10/18/22)</i>	

248/947 NPA

586 NPA



DETROIT ZONE 5

DETROIT ZONE 3

DETROIT ZONE 2

DETROIT ZONE 4

DETROIT ZONE 1

DETROIT ZONE 6

313 NPA

734 NPA

C A N A D A



Michigan 313 NPA Rate Center Map

- NPA Boundary
- Rate Center Boundary

July 2022