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Decision 98-11-065 November 19, 1998

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion into Competition for
Local Exchange Service.

Rulemaking 95-04-043
(Filed April 26, 1995)

Order Instituting Investigation on the
Commission's Own Motion into Competition for
Local Exchange Service.

Investigation 95-04-044
(Filed April 26, 1995)

ORIGINAL

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O P I N I O N

I. Introduction

By this decision, we formally approve a single comprehensive overlay relief plan for the 408 Numbering Plan Area (NPA) based upon review of the alternatives as presented to the Commission by the North American Numbering Plan Administrator (NANPA)¹ by transmittal letter dated August 20, 1998, party position papers and filings, and comments received in response to an Administrative Law Judge (ALJ) ruling dated September 25, 1998.

The 408 area code was created through a split from the 415 area code in 1959. The 831 area code was created through a split from the 408 area code in July 1998. The remaining 408 area code still requires additional relief to meet the industry's projected NXX code exhaustion date of second quarter 1999. Since the 408/831 split, the 408 area code serves Local Access Transport Area (LATA) 722, and there are 11 Rate Centers in the 408 area code.

A 408 NPA relief plan proposal was developed by representatives of the California telecommunications industry in meetings facilitated by NANPA using a consensus decisionmaking process and following industry approved NPA relief planning guidelines. We have reviewed the industry's as well as alternative options. We conclude that 408 NPA relief should be implemented through a comprehensive overlay over the entire 408 area code geographical area. Existing numbers would retain the 408 area code, while new numbers

¹ Lockheed-Martin IMS has recently been appointed as the NANPA and is taking over the area code relief administration previously performed by Pacific Bell (Pacific) on a regional basis, and by Bellcore on a national basis. While Pacific retains responsibility for completing previous NPA relief plans, which it initiated, Lockheed-Martin will assume responsibility for all future NPA relief plans. The NANPA, as the neutral third-party administrator, has no independent view regarding the selected option.

at a minimum for competitive neutrality. These were: (1) mandatory 1+10-digit dialing for all calls within the service areas subject to the overlay;² and (2) the full implementation of permanent local number portability (LNP) within the service area subject to the overlay. We determined that a further record needed to be developed regarding the relative merits of overlays versus splits once anticompetitive impediments could be overcome.

On December 20, 1996, the Commission released D.96-12-086, further expanding on the policy regarding the use of overlays once the competitive impediments could be resolved. In D.96-12-086, we evaluated the relative merits of splits versus overlays in terms of how consumers would be impacted differently with an overlay versus a geographic split. In particular, we reviewed consumer surveys conducted by various parties concerning preferences for overlays and geographic splits as a means of creating new area codes. In that decision, we concluded that, at least for the near term, customers were better served with the geographic split option. We directed that splits should continue to be used for relief plans which would take effect at least through the year 2000. However, particularly in light of the consumer preference survey which reflected a greater receptiveness among certain classes of customers to the overlay proposal in the 310 NPA compared to other NPAs, we left open the possibility of adopting an overlay for the next round of relief in the 310 NPA to take effect prior to 2000. Because consumer preference for an overlay in the survey was premised on the longevity of NPA relief, we ruled in D.96-12-086 that the overlay

² In D.96-12-086, we decided not to adopt statewide mandatory 1+10-digit dialing concurrently with the first overlay. We concluded that the advantages of preserving seven-digit dialing, for as many customers and for as long as possible, outweigh any potential customer confusion resulting from instituting mandatory 1+10-digit dialing only in those regions subject to overlays.

policies, we now consider the proposed options submitted by NANPA for relief in the 408 NPA.

II. Industry Relief Planning Process

The planning process for NPA Relief is established in the industry-approved document INC 97-0404-016 "NPA Code Relief Planning and Notification Guidelines," to be used by NPA Relief Coordinators. The document lists the assumptions, constraints, and planning principles used in NPA Code relief planning efforts. It also lists the steps of the NPA Code relief planning process and describes the alternative methods of providing NPA Code relief and their characteristics.. The NANPA convened a series of meetings with the telecommunications Industry Planning Team to discuss and develop relief alternatives for the 408 NPA. This team is composed of the NANPA, the Telecommunications Division staff and current code holders: local exchange carriers, interexchange carriers, wireless carriers and competitive local carriers (CLCs).

The criteria to compare NPA relief alternatives are:³

1. Minimize end users' confusion.
2. Balance the cost of implementation for all affected parties.
3. Provide that customers who undergo number changes shall not be required to change again for a period of eight to ten years.
4. Not favor a particular interest group.
5. Cover a period of at least five years beyond the predicted date of exhaustion.

³ The criteria are based on the INC 97-0404-016 "NPA Code Relief Planning and Notification Guidelines."

three-way geographic split plan (Alternative 10A/B/C), and a two phased two-way geographic split with a subsequent overlay (Alternative 15) were presented.

Attendees at the public and local jurisdictions completed "Show-of-Interest" forms indicating their preference for the various plans. The Show-of-Interest is not intended to reflect a statistically significant sample of public opinion. The Show-of-Interest does provide the industry with some indication of which alternative has the most support by area, and also provides the industry a method of gathering comments and issues from those in attendance.

At the Local Jurisdiction meeting, a total of 10 Show-of-Interest forms were submitted, however, two were turned in with no selection. Three forms did not indicate a second choice. Of those alternatives that received a first choice selection four were for Alternative 14,⁴ one for Alternative 12A, one each for Alternative 1A and 1B. Two second choices were given to Alternative 10C, and one each to Alternative 1A and 10A.

Throughout the Show-of-Interest forms, a recurring remark was that every effort should be made to keep the City of San Jose in one area code. The grand total Show of Interest selections from both the Local Jurisdiction and Public Meetings resulted in 13 selecting Alternative 15, and seven for Alternative 10C, four each for Alternatives 1A, 1B, 10A, and 12A, and two for 12B. No selections were made for Alternative 10B. There is a dominant showing of interest towards Alternative 15, and a secondary interest towards Alternative 10C. An equal, but lesser interest in Alternatives 1A, 1B, 10A, and 12A. Alternative 15, calling for a

⁴ Alternative 14 is the same as Alternative 15, except that it uses a second new area code for the Phase II overlay instead of simply extending the same area code as used in Phase I.

state. Therefore, the industry recommends shortening the mandatory dialing period for the Phase I split from six to three months. PU Code § 7931, allows for a shortened mandatory dialing period, when numbering resources are not available.

Positions of Parties

Although the industry team voted by consensus to submit Alternative 15, individual industry members were provided the opportunity to present "position papers" offering their views on the proposed 408 NPA relief plan. Position papers were filed by two groups: (1) the "Overlay Coalition"⁵ and (2) jointly by the California Cable Television Association (CCTA) together with AT&T Communications of California, Inc. (AT&T).

A formal opposition to the Alternative 15 proposal was filed on September 20, 1998, by the California Small Business Association (SBA). In order to develop a more complete record on relief plan alternatives, the assigned ALJ issued a ruling on September 25, 1998, soliciting comments concerning the option of a single overlay covering the entire 408 area code. A single comprehensive overlay would have to be implemented prior to January 1, 2001 to meet NXX code exhaustion constraints. Yet, in D.96-12-086, the Commission has determined that overlays may not be implemented prior to this date. Thus, to permit consideration of the single overlay option, the ALJ solicited comments as to whether D.96-12-086 should be amended to permit an exemption for the 408 area code from the prohibition against implementation of overlays prior to

⁵ The members of the Overlay Coalition joining in the position paper are: Winstar Communications, Inc., The Telephone Connection, MobileMedia/Mobilecom, Preferred Networks, Pacific Bell Mobile Services, Pacific, GTE MobileNet, GTE California Incorporated, and Bay Area Cellular Telephone Company.

January 1, 2001. Comments in response to the ALJ Ruling were filed jointly by Pacific and GTEC; jointly by CCTA and NEXTLINK, by RCN Telecom Services of California, Inc., and by Sprint PCS. The NANPA also filed separate comments.

Parties' positions are therefore embodied in the NPA relief proposal submitted by the NANPA, by the separate position papers presented by individual industry members, by the filed opposition of SBA, and by the responses to the ALJ ruling of September 20, 1998. In addition to the formal pleadings of parties, we consider the input provided by the local jurisdiction and public meetings as summarized in the relief plan submitted by the NANPA.

The Overlay Coalition argues that the only reason for a two-phased split-and-overlay is the Commission's policy against implementing an overlay before the year 2001. The Overlay Coalition believes that it is both unnecessary and unwarranted to force the businesses and consumers of the south/southeast portion of the 408 NPA to endure an area code change and for carriers to endure another 18 months of code rationing. Instead of Alternative 15, the Overlay Coalition urges the Commission to adopt an overlay area code throughout the existing 408 NPA immediately.

The Overlay Coalition claims that the Commission's policy was never intended to apply to this round of area code relief in the 408 NPA, and it should not be interpreted inflexibly to impose an arbitrary deadline of January 2001, when that deadline harms customers, businesses, and the entire telecommunications industry. The proposed geographic split will divide the greater South Bay area causing disruption to individuals and lost business and goodwill to the economy of Northern California. The split will also require 500,000 customers to change their telephone numbers, and less than two years later, will require that those same customers implement mandatory 1+10-digit dialing.

SBA agrees with the Overlay Coalition, arguing that the geographic split required under Alternative 15 would have adverse effects, particularly on small businesses in terms of the costs to change their advertising, stationery, business cards, and other printed materials providing notification of the new area code. Approximately one year later, under Alternative 15, the new area code would be extended as an overlay throughout the remaining 408 area code, thereafter requiring all customers (in both the 408 and the new area codes) to dial 1+10-digits for all calls. SBA claims such a plan is not in consumers' interest, makes no sense, and serves no purpose except to conform to a Commission policy requiring geographic splits for new area codes implemented through the year 2000. SBA supports adoption of a single overlay covering the entire existing 408 area code to avoid the need for forced number changes by small business.

In comments filed responding to the above-referenced ALJ ruling regarding exemption of the 408 NPA from the overlay prohibition, Pacific and GTEC argue that D.96-12-086 prohibited overlays only for the specific relief plans which were scheduled at that time to be implemented prior to January 1, 2001, as depicted on the chart reproduced in the decision. The chart in D.96-12-086 only set forth the scheduled relief plan for the recently activated 408/831 geographic split, but did not include the subsequent phase of 408 NPA relief which is now pending before the Commission. Accordingly, Pacific and GTEC argue that the overlay prohibition set forth in D.96-12-086 did not cover the currently pending 408 NPA proposal. Nonetheless, if the Commission concludes that D.96-12-086 did cover the current 408 NPA plan, then Pacific and GTEC propose that the decision be modified to exempt it from the overlay prohibition. Pacific and GTEC argue that a single overlay would expedite relief of the 408 NPA, and minimize disruption to customers.

Pacific and GTEC argue that a single new NPA-wide overlay would provide a greater initial population of numbers in the new area code than would be provided under Alternative 15, with an initial geographic split. With a single overlay, a total of 68 NXX codes would be assigned immediately to the new area code, based on current levels of pent-up demand of carriers for codes. By comparison, the Alternative 15 Phase I geographic split would result in a total of only 50 NXX codes being assigned the new area code. In any event, Pacific and GTEC argue that it would be unconscionable for the Commission to force customers to pay for carriers' competitive advantages, if any existed.

Sprint PCS also supports a single NPA-wide overlay. Since Sprint has been unable to obtain sufficient NXX codes in certain NPAs to permit it to serve new customers, Sprint would welcome an overlay that most efficiently and effectively increases the number of NXX codes available for assignment.

The CCTA and AT&T, in their Position Paper, "acquiesce" to bring Alternative 15, to the Commission for approval with some reservation since the plan assumes the Commission will aggressively move to impose effective code utilization and optimization measures in time to mitigate the anticompetitive effects of the plan's subsequent overlay phase. CCTA/AT&T claim that the incumbent local service provider retains a considerable advantage in having a warehouse of numbers in the 408 area code, and believe this advantage can only be mitigated if the Commission imposes code use optimization measures upon California's telecommunications industry, which includes access to the millions of unused telephone numbers that currently lie dormant.

CCTA/AT&T argue that any order for an overlay in the 408 NPA must also require incumbent LECs to identify and take steps to preserve largely uncontaminated 1,000-number blocks for return to the NANPA (or pooling) administrator) so that incumbents do not carry their unearned competitive

advantage into the new competitive era. Next, the parties urge the Commission to act now to consolidate rate centers, and to institute the porting of unassigned numbers once number portability is in place.

Parties responding to the ALJ ruling representing CLCs oppose any modification to D.96-12-086 removing the prohibition against overlays prior to January 1, 2001. CCTA/NEXTLINK argue that the adopted overlay prohibition reflects customer preferences for geographic splits, and moves toward competitively neutral area code relief solutions. CCTA/NEXTLINK claim that overlay numbers are less desirable to customers, yet it is new entrants—not incumbents—that will be offering overlay numbers. Thus, CCTA/NEXTLINK do not believe an overlay would provide for a competitively neutral outcome. CCTA/NEXTLINK suggest that the Commission could consider one of the two-way or three-way split options developed by the Industry Team instead of Alternative 15.

RCN likewise opposes any plan which includes an overlay, including Alternative 15. RCN observes that both the FCC and the Commission are considering number conservation measures which, if implemented on a national basis, might extend the life of area codes. Based on the prospects for number conservation to defer code exhaustion, RCN claims that the Phase II overlay proposed in Alternative 15 could become unnecessary in its present form. RCN argues that the Commission may be well advised not to commit to any future area code relief plans before the FCC addresses number conservation issues and before this Commission's own inquiry into number conservation is concluded.

Discussion

Although the Industry Team reached consensus on submission the single plan, Alternative 15, individual parties have expressed a preference for other

options. SBA, representing small business interests supports a single overlay. The Overlay Coalition also favors the single overlay option, assuming the regulatory prohibition against implementation before January 1, 2001, is lifted. Other parties representing CLCs oppose the single overlay, and suggest a two-way or three-way split be considered if the Commission rejects Alternative 15. RCN advocates not adopting any plan now, but waiting for code conservation measures to be implemented.

In view of the lead time needed for implementation of an area code relief plan, including adequate advance notice to the public and the industry, we cannot defer a decision adopting an area code relief plan, as suggested by RCN. To do so would result in premature code exhaustion and the denial of telephone numbers to carriers and their customers. While we expect progress to be made in the implementation of code conservation measures, there is no cushion of time to wait for such measures to be concluded before implementation begins on a 408 area code relief plan. We therefore consider the various proposals before us.

Based on the code exhaustion projections by the NANPA, a new area code will be needed to provide relief prior to January 1, 2001. Under the policy adopted in D.96-12-086, we are bound to only consider geographic splits for new area codes instituted prior to January 1, 2001. The Industry proposal of Alternative 15 satisfies this restriction by creating a two-phased implementation, with the first phase being in the form of a geographic split implemented prior to 2001, and the second phase being an overlay implemented after January 1, 2001. The industry also developed other options which exclusively involved geographic split alternatives, with no overlay phase, as noted previously. These latter options ostensibly met the designated industry criteria, but which did not elicit significant support from the public nor the industry.

We find insufficient basis to adopt any of the options exclusively involving two-way or three-way geographic splits as presented by the Industry at the public meetings. In comments suggesting the Commission consider these alternatives, no party addressed the adverse consumer impacts of splitting local communities as contemplated under each of the two-way and three-way split options. On the other hand, the record indicates deficiencies in each of the two-way and three-way split options. Each of these options would entail the splitting of the City of San Jose which would result in significant hardship to customers. As previously noted, a recurring theme at the public meetings was to keep San Jose within one area code. Another geographic split would come on the heels of the 408/831 split which was just recently implemented. With the continual shrinkage of the 408 NPA boundaries through successive geographic splits, it becomes increasingly difficult to minimize dividing local communities, consistent with PU Code § 2887(a).

The adverse effects of forced area code changes on business customers and local economies is set forth in the motion of SBA, as reviewed above. None of the pure geographic split options received significant support among attendees at the local jurisdiction and public meetings. Moreover, the consensus reached by the Industry Team was not to propose any of these alternatives for consideration by the Commission. Thus, although these alternatives nominally meet the prescribed criteria for NPA relief, we find them to be inferior options.

We are therefore left with considering either (1) Alternative 15, which calls for a two-phased split and overlay, or (2) a single overlay implemented for the entire 408 area code. As noted previously, the single overlay option would require implementation prior to January 1, 2001. To adopt such an option, we would need to amend our previous prohibition against overlays, as prescribed in D.96-12-086.

We conclude that a limited exemption from the overlay ban for the 408 is appropriate in view of the circumstances before us in this instance. Our previous decision prohibiting overlays was predicated in large measure on the results of three consumer surveys on area code relief preferences conducted by the parties. Those surveys showed that most respondents favored splits as a relief measure, and that one of the principal reasons given for favoring the split option was that it preserved seven-digit dialing for numbers within the same area code. Yet, under the Industry's Alternative 15 proposal, the very customers which must change area codes through a Phase I split are also deprived of seven-digit dialing once the Phase II overlay takes effect. Within a year of changing area codes, all customers within the present 408 area code, including those assigned a new area code in the Phase I split, would face mandatory 1+10-digit dialing. The customers subject to the Phase I split would experience the worst features of both splits and overlays.

Since all customers within the present 408 NPA would be subject to mandatory 1+10-digit dialing by the end of Phase II under Alternative 15, we conclude that a better solution is to dispense with a Phase I geographic split, and simply implement a comprehensive overlay for the whole 408 NPA at the same time. We conclude that such an approach is a more equitable treatment for all customers within the entire 408 NPA region, on balance.

While we considered and rejected the idea of exempting the 619 area code relief plan from the overlay prohibition, we are faced with a different set of facts here which warrant a different outcome. In the 619 relief proposal, we rejected approving an overlay in favor of a plan which enabled all affected customers to retain seven digit dialing through a three-way geographic split. In the current relief plan, however, the Industry was unable to reach consensus of any alternative which would preserve seven-digit dialing for all affected customers.

The Industry could not reach consensus on a mutually agreeable way to geographically split the current 408 area code without the need for a subsequent overlay. Thus, the rationale for maintaining the prohibition against overlays for the 619 area code is not applicable in the case of the 408 area code where there is no viable option for maintaining seven-digit dialing for customers.

The overlay avoids the problems involved with the continual geographic splitting of local communities, by leaving existing boundaries intact. The overlay also avoids the need for existing customers to change their area code. Business customers, in particular experience economic hardships resulting from having to notify customers of area code changes, and to change business cards, letterheads, etc.

While the overlay avoids these problems, the overlay is not without its own issues. For example, while the NPA boundary would not change, the defining feature of the boundaries would itself change. In other words, the geographic boundaries would no longer define a single NPA, but two (or more) NPAs. Thus, one of the advantages of having geographically-defined NPA boundaries (i.e, as a means of common identification) will over time become less meaningful as multiple NPAs within a single geographic region proliferate. The area code in an overlay signifies *when* the customer was assigned the number rather than *where* geographically, the number is located. For example, a business may consider an assignment of the overlay NPA less desirable than the original NPA which is assigned to a neighboring business, particularly when the NPA is first introduced. Customers may perceive the business with the new NPA to be newer or less established than the neighboring business that retains the more recognized original NPA. Therefore, the advantages of the overlay in avoiding new geographic splits must be weighed against the drawbacks that it creates.

Based upon our review of the alternatives, we conclude that a single overlay of the entire 408 area code is the most appropriate relief option, and we shall direct that such a plan be implemented. We shall grant a limited exemption from our policy in D.96-12-086 for the 408 area code so that an overlay can be implemented prior to January 1, 2001, to avoid the potential new area code geographic area from going through an overlay only 18 months after a split. Normally a split would last for much longer period without requiring any additional change.

We shall direct that the overlay area code covering the entire 408 NPA be opened effective January 1, 2000. This date will relieve code exhaustion earlier than the schedule contemplated under Alternative 15, but should still provide sufficient time to notify the public and the industry regarding the new area code and to conduct the requisite education program to acquaint the public with the concept of mandatory 1+10-digit dialing and dual area codes within a single geographic region. Based on the current rationing of NXX codes in the 408 NPA through the lottery process, available NXX codes are expected to last through the third quarter of 2000. This schedule was predicated on the need to preserve 408 NPA codes through the end of the mandatory dialing period assuming a geographic split was adopted. A new area code implemented through a single overlay can relieve exhaustion sooner than the third quarter of 2000 since the permissive and mandatory dialing periods required for a geographic split will not apply. The need to reserve NXX codes during the permissive and mandatory dialing period only apply where the area code of existing numbers is changed which is not the case with an overlay.

As we stated above, to promote competitive neutrality, any overlay must be preceded by the implementation of permanent local number portability and must include a provision for mandatory 1+10-digit dialing within the overlay

region. Since the FCC has mandated that permanent LNP be implemented in the 100 largest metropolitan service areas (MSAs) nationwide by December 31, 1998, it is reasonable to conclude that permanent LNP will be available in time to satisfy the 408 NPA overlay schedule. We shall also require that mandatory 1+10-digit dialing be implemented in the 408 NPA prior to the opening of the overlay NPA.

The mandatory 1+10-digit dialing requirement assures that all carriers are treated in a competitively neutral manner with respect to dialing parity whether they have numbers in the old or the new NPA. In a similar fashion to the approach we adopted for the 310 NPA overlay, we shall provide for "permissive" and "mandatory" 1+10-digit dialing periods to take effect prior to the opening date for the new overlay NPA. In this way, customers will have an opportunity first to grow accustomed to the 1+10-digit dialing requirement before having to start using the overlay area code. As we stated in D.98-05-021, the "permissive" and "mandatory" dialing periods serve a different purpose in the case of an overlay in comparison to the geographic split. The "permissive" and "mandatory" dialing periods as referenced in Section 7931 of the PU Code specifically apply only where the area code of existing telephone numbers is being changed.

While the statutory Section 7931 "permissive" and "mandatory" dialing periods do not apply in the case of an overlay, a transitional adjustment period is still needed to acquaint customers with the notion of two area codes within a single geographic area. The Commission has previously required that a minimum 12-month period be scheduled preceding the date on which the overlay NPA takes effect to conduct a public education program about the new dialing patterns for an overlay.

As a further condition of approving an overlay for the 408 relief plan, we shall require that a public education program be instituted no later than one year prior to the beginning of mandatory 1+10-digit dialing based on a similar approach to the program we instituted for educating the public about the 310 NPA overlay. Within 45 days of the effective date of this decision, we direct the NANPA to convene an industry meeting to address the implementation details of the PEP, as discussed above. In formulating the PEP, we expect parties to draw upon the experience already gained to date in developing the PEP for the 310 NPA. The minimum criteria for the PEP set forth in D.98-05-021, and as set forth in the conclusions of law to this decision shall be incorporated into the 408 overlay PEP. The Industry Group shall submit a draft of the proposed PEP to the Commission, with copies to the Commission's Consumer Services Division (CSD), Telecommunications Division, and Public Advisor's Office. The due date shall be scheduled by ALJ ruling. The Director of CSD will be primarily responsible for representing the Commission in implementing the PEP, and shall work in cooperation with the other divisions noted above as well as the assigned ALJ, the Assigned Commissioner and the Coordinating Commissioner for telecommunications.

As part of the customer education program for the 408 NPA overlay as discussed below, we shall require that a formal "permissive" dialing period be instituted beginning no later than January 1, 1999, concurrently with the initiation of the customer education program as discussed below. To the extent that any carriers providing local service within the 408 NPA do not presently offer their customers the capability to dial 1+10-digits within the same NPA, we shall require them to make permissive 1+10-digits dialing available to their customers by January 1, 1999. The permissive dialing period shall continue for nine months, until September 30, 1999. During the permissive 1+10-digit dialing

period, customers will still be able to dial seven digits, but should be encouraged to voluntarily dial 1+10-digits for calls within their NPA as part of the education program to prepare them for the overlay.

In D.96-12-086, we directed that, upon activation of mandatory 1+10-digit dialing, customers who attempt to dial seven digits will hear an instructional recording informing them of the 1+10-digit dialing requirement in order to complete their call. In the interests of minimizing customer confusion, mandatory 1+10-digit dialing should take effect three months prior to initiation of the new overlay area code. In this way, customers will already have become somewhat accustomed to dialing 1+10-digits before they have to make the further adjustment of dialing different area codes within a single geographic region.

As another condition of an overlay, the code administrator must make at least one code available in the existing NPA to every existing telecommunications carrier in the affected area code 90 days before the introduction of the new area code. The NANPA shall set aside codes to meet this requirement just prior to the beginning of mandatory 1+10-digit dialing to begin in the third quarter of 1999. We shall direct that service providers becoming certified between January 1, 1999 and the date of the overlay area code activation to contact the NANPA in writing in the event that they want an NXX code in the 408 NPA within 30 days after receiving their CPCN. Existing service providers with no NXXs in the 408 NPA shall file a Statement of Intent with the NANPA if they seek an NXX code 180 days prior to the overlay area code activation. This measure will enable the NANPA to reserve the requisite codes to comply with the FCC code assignment order.

As we explained in D.98-05-021, incumbent carriers holding a warehouse of numbers in a preexisting NPA could gain a competitive advantage over newer

carriers in an overlay NPA by being able to offer customers additional lines with the preexisting NPA which will be more desirable than numbers in a new overlay NPA.

Number pooling is another important measure to promote a more competitively neutral access to numbering resources for all participating carriers by enabling multiple carriers to share a single NXX code through the technology associated with permanent LNP. The Federal Communications Commissions together with its committees is currently working on number conservation measures, including number pooling, at the national level. There are numerous and substantial technical, administrative, and cost issues, however, related to number pooling that must yet be addressed. In particular, an audit of code utilization within the industry will be required to determine the maximum number of NXXs or blocks of 1,000 numbers that can be recovered from pooling participants for sharing. Some degree of NXX code utilization does not automatically disqualify an NXX from being shared. The INC has recommended that the degree of "contamination" (i.e., prior usage) that should be allowed for a block of 1,000 numbers to be considered for the pool is 0% to 10%. Yet, some providers have urged a much higher level of contamination be allowed in order to achieve a greater degree of number efficiency.

In D.98-05-021, as a first step toward the establishment of number pooling, we directed Pacific and GTEC to identify the percentage utilization for all blocks of 1,000 numbers within the NXX codes assigned to them in the 310 NPA, and to report this information to the Director of the Commission's Telecommunications Division within 30 days of the issuance of that order. This initial reporting was limited to the incumbent local exchange carriers (ILECs) since they possess the vast majority of NXX codes in the 310 NPA. As in the case of the 310 overlay, we recognize that immediate measures need to be initiated to address the potential

competitive advantage of the ILECs in having a warehouse of numbers in the 408 NPA which will be more desirable than will numbers in the new NPA. We have placed a high priority on the development of measures to ensure the efficient utilization of NXX codes so that CLCs are not competitively disadvantaged by limited access to numbering resources.

In similar fashion to the requirement we imposed for the 310 NPA overlay, we shall require Pacific and GTEC to identify the percentage of utilization of all blocks of 1,000 numbers within the NXX codes assigned to them in the 408 NPA, and to report this information to the Director of the Commission's Telecommunications Division within 60 days of the issuance of this order. The initial reporting will be limited to the ILECs since they possess the vast majority of NXX codes in the 408 NPA.

Further, as an interim measure until further procedures have been developed in California for 1,000-block pooling, we shall require that number assignments made by the ILECs to their customers in the 408 NPA shall be made first from NXXs that have more than 25% utilization. This utilization level was previously set for the 310 NPA in D.98-05-021. The ILECs may assign numbers from NXXs with less than 25% utilization only to the extent necessary where numbers from NXXs with more than 25% utilization are not otherwise available. This measure will preserve 1,000-number blocks with 25% utilization or less for number pooling once it is implemented. We consider the 25% utilization as a precautionary safeguard on an interim basis to protect existing 1,000-number blocks from undue "contamination" pending the implementation of number pooling. We may further revise the utilization criterion at a future date. We shall place a high priority on the expedited implementation of number pooling in the 408 NPA.

We have recently issued D. 98-08-037 in which we directed that workshops be convened to begin the implementation of number pooling and rate center consolidation. An ALJ ruling was recently issued scheduling workshops to institute number pooling. We directed that the industry submit a schedule for implementation by March 31, 1999. On March 24, 1998, the NANC created a Numbering Resource Optimization Working Group (NRO-WG) to address issues of number availability and conservation. The Common Carrier Bureau (Bureau) has requested that NANC report on national number pooling standards, in sufficient detail to support, both technically and operationally, a uniform, nationwide system for pooling by December 1999. The adoption of a single overlay by January 2000 should provide sufficient time to put in place the code conservation measures which are needed to provide carriers with adequate access to numbering resources.

Conclusion

On balance, we conclude that, while both overlays and geographic splits will have certain adverse impacts to the extent they disrupt the status quo, the adoption of a single overlay will have less overall adverse impacts than any of the other alternatives considered for the 408 NPA. We believe the majority of the consumer acceptance problems with an overlay relate to its novelty and the need for a transition period for customers to grow accustomed to the change in dialing procedures. Taking a longer term perspective, however, these problems should be temporary and adequately resolved through customer education and the practical experience of making calls within regions subject to NPA overlays. Over the longer term, the advantages of the overlay may continue to grow in relation to the alternative of geographic splits, particularly in small densely populated NPAs where further splits become increasingly impractical. Accordingly, we approve a single overlay for the 408 NPA, and direct the

NANPA in cooperation with the Industry Team, move expeditiously to implement this plan as prescribed in the order below to relieve exhaustion of the 408 NPA.

Findings of Fact

1. Area code relief is needed due to the impending exhaustion of NXX codes in the 408 NPA projected to occur during the second quarter of 1999.

2. The Area Code Relief Coordinator convened a series of meetings with the telecommunications Industry Planning Team to discuss and develop relief alternatives for the 408 NPA.

3. The Industry Team eliminated alternative plans which failed to meet the designated criteria.

4. The Industry Team reached consensus on Alternative 15 which calls for a Phase I geographic split and a Phase II overlay.

5. The Commission has stated in D.96-08-028 that "before an overlay could be approved, there must be reasonable assurance that permanent LNP would be fully implemented before the overlay became operational."

6. D.96-12-086 ordered that, with the exception of the 310 NPA, area code relief plans scheduled to be implemented prior to January 1, 2001, were to be performed by geographic split, rather than by overlay.

7. A single overlay covering the entire 408 NPA would have to be implemented prior to January 1, 2001, given the projections of code exhaustion by the NANPA.

8. A limited modification of the overlay ban adopted in D. 96-12-086 would be necessary to permit consideration and adoption of a single overlay for the entire 408 NPA.

9. Without permanent LNP, an overlay in the 408 NPA would not be competitively neutral.

10. In order to approve an overlay for the 408 NPA, permanent LNP must be in place by the date the overlay area code would take effect.

11. Absent the availability of LNP, customers subject to an overlay might have to their change area code merely as a result of changing service providers, placing CLCs at a competitive disadvantage.

12. FCC Order 96-286 established that all carriers, both incumbents and new entrants, must provide LNP in the 100 largest MSAs to all requesting telecommunications carriers, by December 31, 1998.

13. Under the schedule adopted by the FCC, LNP deployment in the 408 NPA region is to be completed by December 31, 1998.

14. By any reasonable measure of potential delay, there is an ample cushion of time to allow for any uncertainties in the LNP implementation and still have LNP fully operational within the 408 NPA before the opening of a single overlay covering the entire 408 NPA.

15. FCC Order 96-333 required that every carrier was to be assured of at least one NXX code in the existing area code during the 90-day period preceding the introduction of any overlay which may be approved.

16. In view of the contingency measures adopted in this decision, sufficient NXX codes will be available to permit the NANPA to assign at least one code in the 408 NPA to each certified carrier within the service area who does not presently have one during the last 90 days preceding the opening of the overlay, as required by the FCC.

17. Since it takes 66 days for the NANPA to complete the code opening process, as noted in D.98-05-021, a schedule is needed for carriers to notify the NANPA of their code orders sufficiently in advance to allow the codes to be opened on a timely basis.

18. PU Code § 7931 requirement for a permissive and mandatory dialing period only applies where existing area codes are changed as part of a relief plan to acquaint customers with the area code change.

19. Since existing telephone numbers do not change in an overlay, and no permissive or mandatory dialing as required in PU Code § 7931 applies, there is no need to delay assignment of telephone numbers in the new NPA while waiting for such periods to transpire.

20. The intent of PU Code § 7931 is to provide a transitional period for customers before a new area code is established, and this underlying intent still applies to overlays.

21. D.96-12-086 required mandatory 1+10-digit dialing within the region subject to an overlay to prevent an anticompetitive dialing disparity between customers of competing carriers who lacked equivalent access to NXX codes in the old NPA.

22. Although there is no area code change for existing numbers with an overlay, customers still need a transitional period to become familiar with mandatory 1+10-digit dialing and the notion of two area codes within a single geographic area.

23. The transitional period for acquainting customers with 1+10-digit dialing can begin upon approval of an overlay and be concluded by the time the overlay would take effect.

24. D.96-12-086 required that a customer education program be instituted at least 12 months before an overlay would take effect explaining the new mandatory 1+10-digit dialing requirements and the overlay plan to the public.

25. D.96-12-086 directed that, upon activation of the overlay area code, customers who dial seven digits will hear an instructional recording informing them of the 1+10-digit dialing requirement.

26. D.96-12-086 identified certain minimum elements to be included in the customer education plan, including an explanation why mandatory 1+10-digit dialing is necessary, and assurance that the change in their dialing patterns will not affect the rates charged for calls.

27. The results of the consumer preference poll reviewed in D.96-12-086 must be evaluated in light of the increasing hardship of cumulative changes in area code, and the difficulty in fairly devising successive splits of the same NPA over time.

28. As the 408 NPA faces further shrinkage in the current proposal for code relief, the drawing of boundaries that minimize the splitting of local communities becomes increasingly difficult.

29. The shorter the NPA life, the more frequently customers must be subjected to the disruptions and hardships that come with changing area codes yet again.

30. An overlay avoids the contentiousness of drawing new NPA boundaries by leaving existing boundaries intact, and avoids the need for existing customers to change their existing telephone number area code.

31. Over the long-term, overlays tend to divide communities inasmuch as communities will not be identifiable by a single area code. Over the long term, this effect may be more pronounced than the community rifts that are introduced by area code splits.

32. A geographic split creates economic hardships particularly on affected businesses which must notify customers of area code changes, and change business cards, letterheads, advertisements, etc.

33. With an overlay, geographic boundaries no longer define a single NPA, thereby eliminating the advantage of having geographically-defined NPA boundaries as a means of identifying and unifying communities of interest.

34. A business may consider an assignment of the overlay NPA less desirable than the original NPA, since customers may perceive the business with the new NPA to be newer or less established than the neighboring business that retains the more recognized original NPA.

35. The ILECs possess the majority of NXX codes in the 408 NPA, and may seek to offer numbers to customers from NXX codes in the 408 NPA after the overlay as a marketing tool.

36. The ILECs advantage in possessing the majority of NXX codes in the 408 NPA may be effectively addressed by the implementation of number pooling.

37. Number pooling can promote more competitively neutral access to numbering resources for all participating carriers by enabling multiple carriers to share a single NXX code through the technology associated with permanent LNP.

38. An audit of code utilization within the industry will be required to determine the maximum number of NXXs or blocks of 1,000 numbers that can be recovered from pooling participants for sharing.

39. With an overlay, customers will experience the loss of seven-digit dialing for calls within the same NPA.

40. In the consumer preference surveys reviewed in D.96-12-086, customers placed significant value on the ability to dial only seven digits for calls within the NPA.

41. The overlay will still require customers to learn that calls within the same area code also require 1+10-digit dialing.

42. With the overlay, customers with multiple lines at the same location seeking to add additional lines may only be able obtain the additional lines under the new area code, resulting in two area codes at the same location.

43. While both overlays and geographic splits have certain adverse impacts, a single comprehensive overlay will have less overall adverse impacts than any of the alternatives proposed for the 408 NPA.

Conclusions of Law

1. The adopted relief plan should be the alternative which best satisfies the criteria applied by the Industry Team in their selection of relief alternatives, namely:

- a. Minimize end users' confusion.
- b. Balance the cost of implementation for all affected parties.
- c. Provide that customers who undergo number changes shall not be required to change again for a period of eight to 10 years.
- d. Not favor a particular interest group.
- e. Cover a period of at least five years beyond the predicted date of exhaustion.
- f. Provide that all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lives of more than 15 years, should be avoided.
- g. Comply with state and federal statutes, rulings and orders.

2. In order to qualify for approval, the overlay plan must meet the minimum criteria established by this Commission and by the FCC for competitive neutrality at the date by which the overlay would take effect.

3. Each of the two-way and three-way geographic split options developed by the Industry would entail the splitting of the City of San Jose which would result in significant hardship to customers.

4. A recurring theme at the public meetings was to keep San Jose within one area code.

5. Under the Industry's Alternative 15 proposal, the very customers which must change area codes through a Phase I split are also deprived of seven-digit dialing once the Phase II overlay takes effect.

6. One of the principal reasons underlying the customer preference for splits as revealed in the consumer preference surveys taken in 1996 was the retention of seven-digit dialing.

7. D.96-12-086 should be amended to make a limited exemption of the 408 area code from the prohibition against overlays prior to January 1, 2001, to avoid the potential new area code from becoming subject to an overlay only 18 months after a split.

8. The adoption of an overlay for the 408 NPA as prescribed in this order satisfies the criteria for competitive neutrality, and provides the best overall solution based upon the relief planning criteria applied by the Industry Team.

9. A single comprehensive overlay plan should be approved for the 408 NPA in accordance with the terms and conditions adopted in the order below.

10. The customer education program to acquaint customers with mandatory 1+10-digit dialing and the overlay, as ordered in D.96-12-086, should incorporate the features set forth below.

11. Since permissive 1+10-digit dialing already is in place for some telecommunications carriers, customers should be encouraged to voluntarily dial 1+10-digits for calls, where permissive 1+10-dialing is available within their NPA as part of the education program during the year leading up to the overlay. Customers shall be directed to contact their telecommunications carrier regarding whether permissive 1+10 is available in their area.

12. The recorded instructional announcement alerting customers who dial seven digits to dial 1+10-digits should be continued indefinitely by all

telecommunications carriers following the date of the 408 NPA overlay area code is opened.

13. The public education plan should focus attention on the education of all classes of customers including children, the elderly, the disabled, as well as to the many ethnic groups in the current 408 NPA.

14. The education program should cover customers in adjacent NPAs to the 408 area code, since they will still be impacted by the 408 NPA dialing requirements to the extent they temporarily visit and make calls within the 408 NPA region.

15. To a lesser extent, some public education regarding this overlay plan needs to be conducted on a statewide basis, recognizing that California is a highly mobile state, and residents from other regions may have occasion to travel into the 408 NPA calling area.

16. The industry should give priority to notifying security alarm companies, customers with PBXs, and other entities which will need to reprogram equipment as a result of the change to mandatory 1+10-digit dialing.

17. The Commission should place a high priority on promoting the development of measures to promote the efficient utilization of NXX codes so that CLCs are not competitively disadvantaged by limited access to numbering resources after the overlay is established.

18. As an interim measure, given their existing pool of numbers in the 408 NPA, Pacific and GTC should be ordered to identify the percentage utilization for all blocks of 1,000 numbers within the NXX codes assigned to them in the 408 NPA, and to report this information to the Director of the Commission's Telecommunications Division within 60 days of the issuance of this order.

19. As an interim measure until further procedures have been developed in California for 1,000-block pooling, number assignments made by the ILECs to

their customers in the 408 NPA should be made first from NXXs that have more than 25% utilization. This measure will preserve NXX codes with 25% utilization or less for number pooling solutions once those solutions are implemented.

O R D E R

IT IS ORDERED that:

1. The proposed single comprehensive and overlay plan for the 408 Numbering Plan Area (NPA) is hereby approved. The following implementation schedule is adopted for the 408 NPA overlay relief plan:

CUSTOMER EDUCATION - DIALING CHANGE SCHEDULE

Start of Permissive 1+10-Digit Dialing and Public Education Program	January 1, 1999
Start of Mandatory 1+10-Digit Dialing	October 1, 1999
Opening of Overlay Area Code	January 1, 2000

2. All telephone corporations shall implement mandatory 1+10-digit dialing on October 1, 1999 in the 408 NPA.

3. The North American Numbering Plan Administrator (NANPA) is hereby ordered to proceed with all due diligence to expeditiously implement the approved 408 NPA overlay relief plan.

4. No later than January 1999, the NANPA shall notify the general public regarding the new area code to be assigned as an overlay covering the same geographic area as the existing 408 area code. The notice shall set forth the schedule for mandatory 1+10-digit dialing and for the overlay new area code to be activated.

5. Each telephone corporation, including paging companies and resellers, serving the geographic area covered by the existing 408 NPA shall give written notice to its affected customers of the adopted 408 NPA overlay relief plan

without delay and no later than January 1999. The notice shall advise customers as to whether that telephone corporation offers permissive 1+10-digit dialing to reach numbers within their own area code in preparation for the pending overlay, and that 1+10-digit dialing will become mandatory within the boundaries of the 408 area code effective October 1, 1999, as a result of the new overlay area code to take effect January 1999.

6. The NANPA shall provide nationwide notification of the adopted 408 NPA relief plan by no later than January 1999.

7. Pacific Bell (Pacific) and GTE California Incorporated (GTEC) shall each be required to file a report explaining whether permanent LNP is fully implemented within the 408 NPA region served by each incumbent local exchange carrier by December 31, 1998. The report shall be filed with the Commission and served on each party to this proceeding by January 5, 1999. In the event that permanent LNP is not yet fully operational, the report shall set forth a contingency plan to address the failure to meet the Federal Communications Commission (FCC) deadline.

8. The NANPA shall convene an industry meeting within 45 days following the effective date of this decision for the purpose of developing consensus on the implementation of the public education program for the overlay to include, at a minimum, the elements discussed in Decision 96-12-086, and in the conclusions of law above, and the schedule for mandatory 1+10 digit dialing.

9. The public education program shall give first priority to focusing on the 408 NPA and surrounding areas, and provide for a combination of press releases, television and radio announcements, and billing inserts explaining the effects of the overlay.

10. The Industry Group shall submit a draft proposal of the public education program to the Commission's Consumer Services and Telecommunications

Divisions and Public Advisor's Office for review and approval as scheduled by the assigned Administrative Law Judge (ALJ). The review and approval shall be coordinated among the Public Advisor, the Consumer Services and Telecommunications Divisions, the assigned ALJ, the Coordinating Commissioner for telecommunications, and the Assigned Commissioner.

11. Any existing certificated facilities-based competitive local carrier (CLC) which has not previously been assigned a 408 NPA NXX code, or any such carrier certificated on or before December 31, 1998, shall file a "Statement of Intent" with the NANPA if it seeks to be assigned such a code no later than 180 days prior to the implementation of the overlay.

12. Any new facilities-based CLCs becoming certificated or intending to become certified between January 1, 2000, and the activation of the overlay NPA shall be required to notify the NANPA within 30 days of certification if they intend to request a 408 NPA NXX code prior to the opening of the overlay NPA.

13. The NANPA shall reserve the necessary NXX codes to satisfy the FCC code assignment requirement within the 408 NPA.

14. To the extent additional NXX codes are needed to meet the FCC requirement, additional codes shall be reserved by the NANPA from the lottery to be made available to new entrants without any codes in the 408 NPA who require one.

15. Within the final 90 days preceding the opening of the overlay NPA, the NANPA shall declare a freeze on further assignments of 408 NPA codes, with the exception of new entrants who require one code to satisfy FCC requirements. The Commission, on its own motion or at the request of the NANPA, reserves the option to reevaluate this freeze as the availability of NXX codes becomes more predictable.

16. The assigned ALJ is directed to take further comments on appropriate measures regarding the assignment of telephone numbers from NXX codes in the 408 NPA after the overlay NPA is activated in order to promote competitive neutrality.

17. As an interim measure until further procedures have been developed in California for 1,000-block pooling, number assignments made by the incumbent local exchange carriers (ILECs) to their customers in the 408 NPA shall be made first from NXXs that have more than 25% utilization. The ILECs may assign numbers from NXXs with less than 25% utilization only to the extent necessary where numbers from NXXs with more than 25% utilization are not otherwise available.

18. Pacific and GTEC shall identify the percentage utilization for all blocks of 1,000 numbers within the NXX codes assigned to them in the 408 NPA, and to report this information to the Director of the Commission's Telecommunications Division within 60 days of the issuance of this order.

19. Decision (D.) 96-12-086 is amended to exempt the 408 NPA from the ban on overlays being implemented prior to January 1, 2001.

20. Carriers shall develop necessary procedures to implement the overlay measures prescribed in Ordering Paragraph 5 of D.96-12-086.

This order is effective today.

Dated November 19, 1998, at San Francisco, California.

RICHARD A. BILAS

President

P. GREGORY CONLON

JESSIE J. KNIGHT, JR.

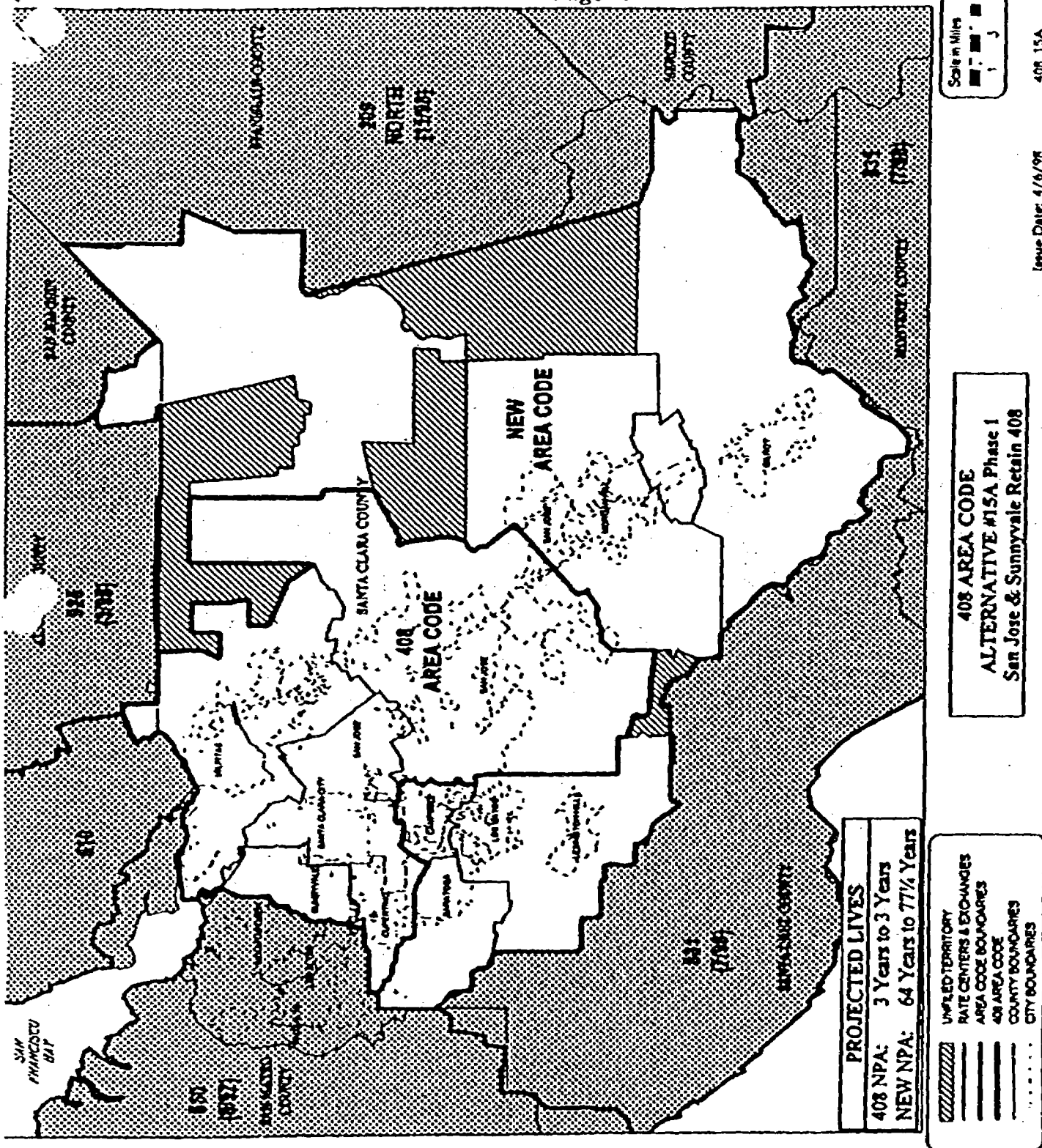
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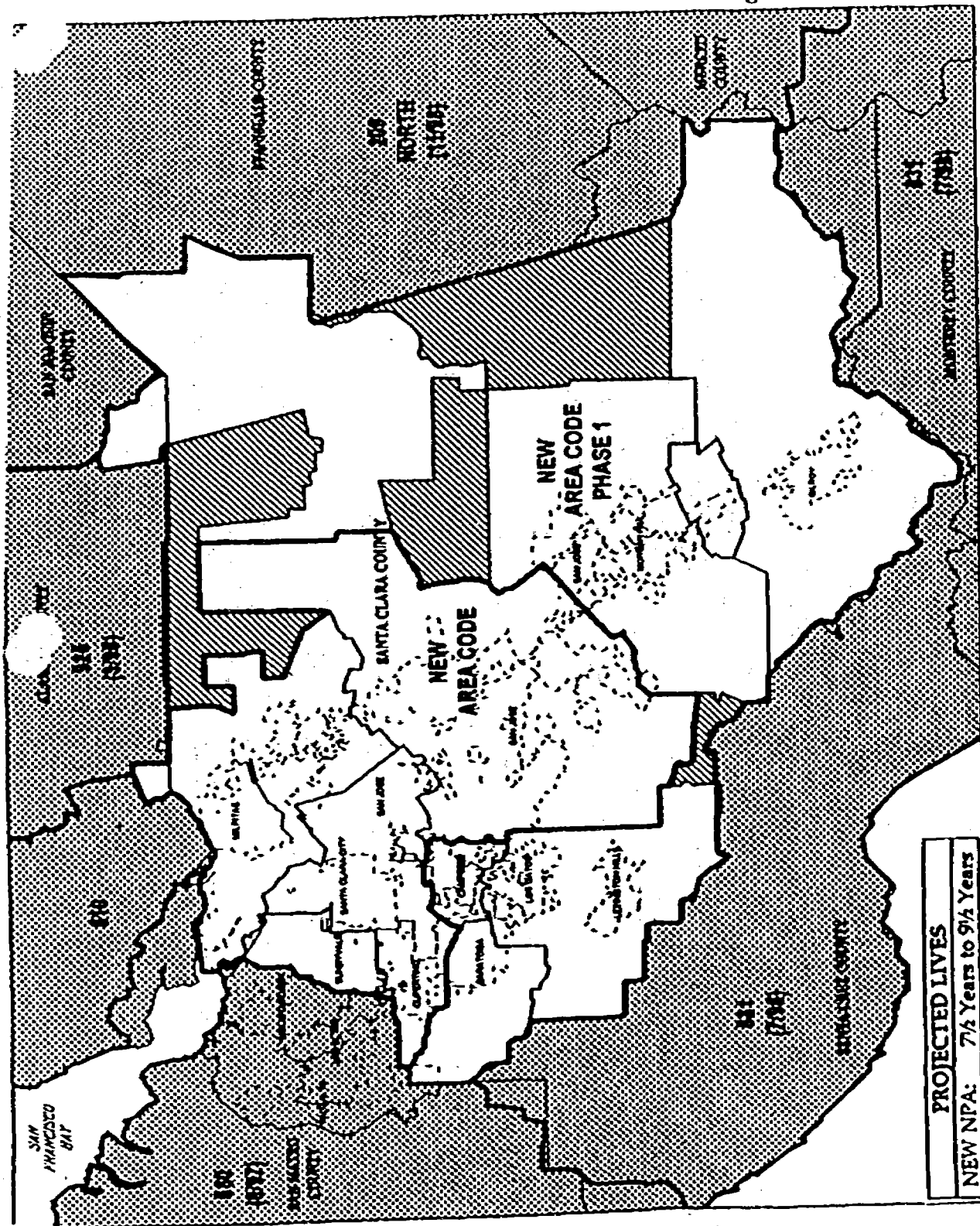
JOSIAH L. NEEPER

Commissioners

APPENDIX A

Page 1





Scale in Miles
0 1 2 3

408, 15B

Issue Date: 4/6/98

Provided by California Nevada Code Administration (CICA)

408 AREA CODE
ALTERNATIVE #15B-Phase 2
"Overlay Remaining area code using Phase 1 area code"

UNFILED TERRITORY
RATE CENTERS & EXCHANGES
AREA CODE BOUNDARIES
NEW AREA CODE
COUNTY BOUNDARIES
CITY BOUNDARIES

408 NPA
Industry Recommended Relief Plan
Life Calculation for Alternative #15

NXX ASSIGNMENT SUMMARY		GROWTH FORECAST	
Assigned End Office NXXs Old NPA	295	Year: * 1997	91
Assigned Tandem NXXs Old NPA	96	Year: 1998	76
Assigned NXXs New NPA	45	Year: 1999	76
Total Assigned NXXs	436	Year: 2000	76
Special Use NXXs Old NPA	12	Year: 2001	76
*NXXs Available for Assignment	344	Assigned in 1998:	39
Maximum NXXs Available per NPA	792		
*Includes 184 NXXs to be recovered from 408/831 Split		Remaining Year Forecast:	81
		* Growth forecast as of 1/1/97	
Description of Plan Serving Areas		Projected Life:	
408 NPA: Those 408 NXXs at the tandems, the SNJS north, SNJS south, SNJS west, and Sunnyvale rate centers.		OLD NPA:	3 Years
		NEW NPA:	7 1/2 - 9 1/2 Years
		Projected Exhaust:	
New NPA: Those NXXs at the Saratoga, Campbell, Los Gatos, Morgan Hill, Gilroy, San Martin and San Antonio rate centers		OLD NPA:	Early 2002
		NEW NPA:	Mid 2006 - Mid 2008

APPENDIX A

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SUM OF TOTALS FROM PUBLIC MEETING INTEREST FORMS:

ALT.#	SAN JOSE#1 TOTALS	SAN JOSE#2 TOTALS	LOS GATOS TOTALS	MGNHL TOTALS	GRAND TOTAL
1A	1		1		2
1B			3		3
10A			3		3
10B					
10C	1		4		5
12A	1		2		3
12B			2		2
15	4	1	3	1	9

SUM OF PUBLIC AND LOCAL JURISDICTION MEETING INTEREST FORMS

ALT. #	PUBLIC MTGS	LJ MTG**	TOTAL
1A	2	2	4
1B	3	1	4
10A	3	1	4
10B			
10C	5	2	7
12A	3	1	4
12B	2		2
15	9	4*	13

*Alternative 15 (split & overlay) was presented to the LJs as Alt.# 14, the split line is the same and the concept is the same except it uses one new NPA rather than two.

**Local Jurisdiction(LJ) Mtg. was held January 20th in San Jose.

Review of Show of Interest Form Totals

There is a dominant showing of interest towards Alternative #15.

There is a secondary showing of interest towards Alternative 10C.

There is a tertiary showing of interest of an approximately equal value toward Alternatives 1A, 1B, 10A and 12A.

(END OF APPENDIX A)

Alt.	NPA	Alternative Name	Lives 7/97	Revised Lives 9/97
1A	408	San Jose West Rate Center &	9 1/4 Years to 11 Years	13 Years to 15 1/2 Years
1A	NEW	all Tandem NXXs	12 1/4 Years to 15 Years	9 1/4 Years to 11 1/4 Years
1B	408	San Jose West Rate Center &	6 Years to 7 Years	7 1/4 Years to 8 1/4 Years
1B	NEW	all Tandem NXXs	20 1/4 Years plus	15 1/4 Years to 18 1/4 Years
2A	408	San Jose North/West &	3 1/4 Years to 4 1/4 Years	4 1/4 Years to 5 Years
2A	NEW	Sunnyvale RCs & Exchanges	39 Years plus	30 Years to 36 1/4 Years
2B	408	San Jose North/West &	14 1/4 Years to 17 1/4 Years	25 1/4 Years to 30 1/4 Years
2B	NEW	Sunnyvale RC & Exchanges	8 1/4 Years to 9 1/4 Years	6 Years to 6 1/4 Years
3A	408	All San Jose Rate Centers	4 Years to 4 1/4 Years	4 1/4 Years to 5 1/4 Years
3A	NEW		36 1/2 Years to 44 Years	28 Years to 33 1/4 Years
3B	408	All San Jose Rate Centers	31 Years to 37 1/4 Years	23 1/4 Years to 28 1/4 Years
3B	NEW		5 1/4 Years to 6 1/4 Years	6 1/4 Years to 7 1/4 Years
4A	408	Sunnyvale & SNJS RCs only	2 1/4 Years to 2 1/4 Years	3 Years to 3 Years
4A	NEW		45 Years to 45 Years	64 Years to 77 1/4 Years
4B	408	LSGT Area & East Area of Cnty	45 Years to 45 Years	55 1/4 Years to 67 1/4 Years
4B	NEW		4 Years to 4 1/4 Years	4 1/4 Years to 4 1/4 Years
5A	408	SNJS Rcs Only (SNVA RC to	4 Years to 4 1/4 Years	3 1/4 Years to 4 Years
5A	NEW	650 NPA)	45 Years to 45 Years	54 1/4 Years to 66 1/4 Years
5B	408	East County & LSGT Area	45 Years to 45 Years	47 1/4 Years to 57 1/4 Years
5B	NEW	(SNVA RC to 650)	5 1/4 Years to 6 1/4 Years	5 Years to 5 1/4 Years
7A	408	West Area Rate Centers	5 1/4 Years to 6 Years	6 1/4 Years to 7 1/4 Years
7A	NEW		25 1/4 Years to 31 Years	19 1/4 Years to 23 1/4 Years
7B	408	East Area Rate Centers	21 1/4 Years to 26 Years	16 1/4 Years to 19 1/4 Years
7B	NEW		6 1/4 Years to 7 1/4 Years	8 Years to 9 1/4 Years
8A	408	West Industrial Rate Center	3 Years to 3 1/4 Years	3 1/4 Years to 3 1/4 Years
8A	NEW		45 Years to 45 Years	48 1/4 Years to 58 1/4 Years
8B	408	East Industrial Rate Centers	45 Years to 45 Years	41 1/4 Years to 50 1/4 Years
8B	NEW		4 1/4 Years to 4 1/4 Years	4 1/4 Years to 5 1/4 Years
9	408	Overlay	1 1/4 Years	No Change
	NEW		11 1/4 Years to 13 1/4 Years	
10A	408	3-Way Rate Center (West)	7 1/4 Years to 9 Years	13 Years to 15 1/2 Years
10A	NEW	3-Way Rate Center (North)	29 Years to 34 1/4 Years	22 Years to 26 1/4 Years
10A	NEW	3-Way Rate Centers (South)	29 1/4 Years to 36 Years	30 Years to 36 1/4 Years
10B	408	3-Way Rate Center (North)	8 1/4 Years to 9 1/4 Years	18 1/4 Years to 22 Years
10B	NEW	3-Way Rate Center (West)	20 1/4 Years to 25 Years	15 1/4 Years to 18 1/4 Years
10B	NEW	3-Way Rate Center (South)	26 1/4 Years to 31 1/4 Years	30 Years to 36 1/4 Years
10C	408	3-Way Rate Center (South)	10 1/4 Years to 12 Years	25 1/4 Years to 30 1/4 Years
10C	NEW	3-Way Rate Center (West)	20 1/4 Years to 25 Years	15 1/4 Years to 18 1/4 Years
10C	NEW	3-Way Rate Center (North)	19 1/4 Years to 23 1/4 Years	22 Years to 26 1/4 Years

408 LIVES SUMMARY

Alt.	NPA	Alternative Name	Lives 7/97	Revised Lives 9/97
11A	408	North Area of County	2½ Years to 2½ Years	2½ Years to 2½ Years
11A	NEW		45 Years to 45 Years	99½ Years to 121 Years
11B	408	North Area of County	45 Years to 45 Years	86½ Years to 104½ Years
11B	NEW		3½ Years to 3½ Years	3½ Years to 4 Years
12A	408	Saratoga, Campbell & SNJS	8 Years to 9½ Years	10½ Years to 12½ Years
12A	NEW	West Rate Centers	15½ Years to 18½ Years	11½ Years to 13½ Years
12B	408	SNVA, LSGT & SNJS No/	12½ Years to 14½ Years	9½ Years to 11 Years
12B	NEW	So. Rcs & East County	9½ Years to 11½ Years	12½ Years to 15½ Years
13A	408	San Jose North &	26 Years to 31½ Years	19½ Years to 23½ Years
13A	NEW	San Jose South	6 Years to 7 Years	7 Years to 8½ Years
13B	408	West & East Areas of	4½ Years to 5 Years	5½ Years to 6 Years
13B	NEW	County	30½ Years to 37½ Years	23½ Years to 28½ Years