

Decision 99-12-049 December 16, 1999

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)

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O P I N I O N

I. Introduction

This decision adopts a three-way geographic split to deal with the exhaustion of numbers in the 707 area code (or "Numbering Plan Area (NPA)") as proposed by the North American Numbering Plan Administrator (NANPA).

The 707 area code was implemented in 1959 when it was geographically split from the 916 NPA, one of the three original area codes assigned to California in 1947 when the North American Numbering Plan was implemented. The 707 NPA currently serves a portion of Local Access and Transport Areas (LATA) 722 and 726 located in Northern California as depicted on the map in Appendix A.

The NANPA states that the 707 area code now requires relief to meet the telecommunications industry's projected exhaust of remaining NXX codes in the first quarter 2001. The demand for numbering resources in the 707 NPA is being stimulated by the introduction of competition in the local exchange market and accelerated demand for new services and rapid changes in technology.

The process for implementing new area codes in California is covered by state statute, applicable Commission decisions, requirements of the Federal Communications Commission (FCC), and industry guidelines. California State statutes prescribe requirements for customer notification, establishment of new NPA boundaries and transitional dialing periods.

Relevant Public Utilities code sections addressing area code relief were impacted by legislation enacted during the 1997-98 legislative session (AB 2716, Ch. 534, Stats. 1998). Section 2887 was repealed; Section 7930 was repealed and added, and Sections 7931 and 7932 were amended and renumbered. However,

the area code relief planning cycle for this particular area code is governed by the referenced statutes as they existed prior to enactment of Ch. 534. "Affected subscribers" must have written notice at least 24 months prior to the introduction of a new area code in the 707 NPA.

We have formulated statewide policies regarding area code relief through a series of decisions since 1995. Area code relief plans have become increasingly controversial in recent years as the demand for numbering resources has risen dramatically due to new technological advances in telecommunications and to the advent of local competition. We acknowledged the need for a comprehensive statewide policy on area code relief in connection with the proposed 310 NPA relief plan filed in 1995. We considered at that time the adoption of an overlay for the 310 NPA as an alternative to the traditional use of geographic splits. In Decision (D.) 95-08-052, we rejected the overlay option for the 310 NPA on the basis that among other things, it was not at that time a competitively neutral relief remedy. We left open the prospect of considering an overlay as an option in future NPA relief plans once the anticompetitive aspects of the overlay could be overcome. We further directed that the Local Competition Docket be used to develop a comprehensive statewide policy regarding NPA relief.

On August 2, 1996, we issued D.96-08-028, adopting certain initial measures as part of a statewide policy on area code relief. We concluded in D.96-08-028 that as a condition for consideration of the overlay as a relief option, the overlay must be competitively neutral. We also established two prerequisites 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;¹ 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 end of 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 NPA's, 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.

¹ In D.96-12-086, we ruled 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.

The Commission subsequently issued D.98-05-021, which ordered an overlay to take effect in July 1999 in the 310 area code. D.98-05-021 also directed carriers to implement 11-digit dialing prior to the imposition of the overlay. The purpose of 11-digit dialing was to mitigate any competitive advantage an incumbent local carrier might realize if its customers could continue to dial seven digits while competitors' customers would have to dial 11 digits. The initiation of 11-digit dialing prior to the overlay would provide customers an opportunity to become accustomed to the new dialing pattern.

Subsequently, Assemblyman Knox and numerous other parties filed a petition to modify D.98-05-021 that sought to eliminate the imposition of the overlay and associated 11-digit dialing. D.99-09-067, issued September 16, 1999, granted the request on the basis that the Commission had become better informed about the cost and disruption to customers occasioned by 11-digit dialing, and because the FCC had recently granted the Commission authority to implement number conservation measures. D.99-09-067 ordered a variety of number conservation measures, consistent with the FCC's September 15, 1999 order in CC Docket No. 96-98. By way of letter to Pacific Bell (Pacific) and GTE California Incorporated (GTEC) dated September 21, 1999, the Commission's Executive Director thereafter temporarily suspended the imposition of 11-digit dialing in the 408 area code, which had been scheduled to begin October 2, 1999. On September 17, 1999, the City of Berkeley filed a request in this docket to suspend the imposition of an overlay and 11-digit dialing in the 510 area code. On September 21, 1999, the Commission's Office of Ratepayer Advocates filed a petition to modify all previous orders requiring overlays and 11-digit dialing in various locations around the state. In the context of this background, we address the type of relief required in the 707 area code.

II. Framework for Addressing Code Exhaustion in the 707 NPA

The Commission has initiated various measures, in conjunction with ongoing efforts at the federal level, to promote more efficient utilization of numbers. We acknowledge the FCC's plenary jurisdiction over numbering issues within the United States. The FCC has delegated certain jurisdiction to state commissions regarding the oversight of numbering resources as explained below.

In June 1996, we issued D.96-06-062, recognizing the need to establish code conservation measures in the 310 NPA to forestall premature code exhaustion before the 562 NPA split could be finalized. One of the measures was a process utilizing a lottery to ration a prescribed number of NXX codes each month. In response to continuing code shortages, the assigned Administrative Law Judge (ALJ) issued a ruling on January 13, 1998, soliciting further comments on measures to conserve and efficiently utilize NXX codes on a statewide basis.

In response to comments filed pursuant to that ruling, we issued D.98-08-037, which initiated a series of technical workshops to address NXX code conservation and efficient utilization through various means. One of the most promising measures potentially to alleviate the shortage of numbering resources is the use of number pooling. Initiatives have been ongoing at both the state and federal levels to implement number pooling. On November 6, 1998, the FCC's Common Carrier Bureau released a report for comments entitled "Number Resource Optimization Working Group Modified Report to the NANC on Number Optimization Methods" (NRO Report). The NRO Report identified both individual telephone number (ITN) pooling and 1,000-block pooling as options to be pursued. The most imminent form of number pooling being developed involves the disaggregation of NXX codes into discrete blocks of 1,000

numbers. Once 1,000-block number pooling is implemented, carriers can obtain blocks of 1,000 per rate center, rather than the 10,000-number blocks under current procedures.

Pursuant to D.98-08-037, we authorized a number pooling industry task force to work toward implementing number pooling. Our progress was impacted, however, by a FCC Order issued on September 28, 1998, responding to a petition filed by the Pennsylvania Commission. The FCC's Pennsylvania Order,² clarified the scope of authority over numbering issues delegated to the states in the Second Report and Order.³

In that order the FCC declined "to grant states authority to order mandatory number pooling." (*Id.* ¶ 24.) Rather, the FCC authorized state commissions to experiment with voluntary number pooling trials, consistent with the guidelines adopted in the Pennsylvania Order.

State commissions may order that a certain number of NXX codes in a new area code be withheld from assignment and saved for pooling purposes. No carrier, however, may be denied a NXX code so that it can be saved for pooling purposes. If a NXX code exhaust situation in an area code becomes so dire that there are not NXXs available to assign to carriers, the NXXs that have been withheld from assignment must be made available for carriers. States are thus free to implement number pooling trials that comply with the guidelines set forth in this Order. (Pennsylvania Order, ¶ 27.)

At the same time, recognizing that circumstances vary from state to state, the FCC authorized states to seek additional authority to conduct number

² Memorandum Opinion and Order and Order on Reconsideration, FCC 98-228, Released September 28, 1998.

³ Second Report and Order and Memorandum Opinion and Order, FCC 96-333, Released: August 8, 1996.

pooling trials "which fall outside of the guidelines we adopt in this Order."

(Id. ¶ 31.)

Workshops were subsequently conducted to devise a voluntary number pooling trial. We required the Number Pooling Task Force (Task Force) to submit an implementation schedule for a voluntary number pooling trial within California by March 31, 1999. The Task Force did not develop such a timeline or any other recommendations on how a pooling trial should be conducted. Instead, in an Interim Report to the Commission issued in March 1999, the Task Force explained that it had reached consensus "against recommending a voluntary number pooling trial in California at this time, given the positions that various parties have taken on the matter." Specifically, the Task Force reported that the incumbent local exchange carriers (ILECs) declined to participate in a voluntary trial. The Task Force further reported that the competitive local exchange carriers (CLECs) are of two views: a minority wished to pursue a voluntary pooling trial in hopes of obtaining blocks of numbers smaller than 10,000, while the majority of CLECs considered voluntary pooling trials to be a waste of time and resources if the ILECs will not participate.

On September 15, 1999, the FCC granted the Commission's request for additional delegated authority with respect to certain area code policies. The FCC reversed some longstanding principles of number allocation and the authority of California to require number conservation measures. Specifically, the FCC's order permits California to:

1. Institute a mandatory 1,000-block number pooling trial of the 10,000-block allocations previously required ;
2. Require carriers to submit number utilization data;
3. Establish number usage thresholds;
4. Reclaim unused and reserved NXX codes and portions of those codes;

5. Require sequential number assignments; and
6. Resolve claims of carriers requesting numbers outside the exiting rationing procedures.

The FCC's order recognizes that California is reaching a stage of crisis in number allocation. Although it provides the Commission with considerable discretion to develop number conservation programs, it reiterates its policy that state Commissions must assure adequate number resources be made available on an equitable and timely basis. In that spirit, it requires that California develop "back-up" plans where number conservation practices are relied upon as the primary remedy in area codes reaching exhaust. It also requires that the Commission consider rate center consolidation, determine methods for carriers to recover the costs of number conservation efforts and to implement pooling trials one region at a time. The order states its provisions are interim, pending the FCC's orders in its rulemaking on numbering resource optimization (CC Docket No. 99-200, FCC 99-122, June 2, 1999). We expect an FCC order in that matter in mid-2000.

We have grown acutely concerned about the proliferation of NPA relief plan filings with the Commission in recent years. While we have continued to act on these proposed plans expeditiously in the interests of promoting the availability of numbering resources, the result has been a mushrooming explosion of new area codes with accompanying disruption to customers. Irrespective of the particular form of relief adopted (i.e., geographic split or overlay), customers still experience disruption as a result of the continuing addition of new NPA's, as repeatedly expressed in public meetings and in letters submitted to the Commission from citizens and local jurisdictions in affected NPA relief areas.

We continue to remain cognizant of the need to assure timely availability of scarce numbering resources, and to implement NPA relief as necessary to promote this goal. Accordingly, in this decision, we adopt an area code relief plan to relieve code exhaustion in the 707 NPA. Nonetheless, the longer term solution to number exhaustion is the institution of more efficient number utilization practices.

This decision orders several measures designed to promote more efficient number utilization in the 707 NPA in the hopes deferring as long as possible the need for any subsequent NPA relief plan following implementation of the geographic split adopted herein. First, we will direct the NANPA to determine whether any NXX codes assigned in the 707 NPA have not been activated in the time frame provided by industry guidelines. If some codes have not been timely activated, we direct the NANPA to seek return of those NXX codes. We will explore the implementation of efficient number management practices, such as "fill rates" or sequential numbering. We will also explore other feasible means of promoting more efficient number usage, such as service specific overlays, rate center consolidation, and other means. We shall order carriers to provide us with utilization information necessary to implement return of unused numbers and efficient allocation of numbers.

We are mindful of the FCC's desire to maintain a nationally cohesive numbering system, and we do not wish to undercut that effort. We anticipate working closely with the FCC and the industry to ensure that we do not impede the FCC's efforts for national standards for number pooling.

A. Number Conservation Measures

1. Number Pooling

Number pooling is a valuable tool to promote efficient utilization of NXX codes in the 707 NPA. Number pooling can also 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. There are various technical, administrative, regulatory and cost issues related to number pooling, however, that must be addressed before number pooling can be implemented in the 707 NPA.

As an initial matter, the FCC granted this Commission authority to conduct a number pooling trial in one Metropolitan Statistical Area (MSA). We have already begun implementation of a pooling trial in the MSA that includes the 310 and 818 NPAs. The FCC provided that after having implemented a 1,000-block pooling trial in one MSA, we may expand the trial to other MSAs. In such a case, the FCC required that carriers be allowed sufficient transition time to undertake any necessary steps, such as modifying databases and upgrading switch software, to prepare for an expansion of 1,000-block pooling to additional MSAs. Thus, the FCC intended that the starting dates for 1,000-block pooling in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps.

In view of the number pooling trial already underway in the 310 and 818 NPAs, and the potential implementation of subsequent number pooling trials in other NPAs, it would thus be premature to order a number pooling trial for the 707 NPA at this time. Nonetheless, we believe that preliminary number conservation measures can and should begin now in preparation for the eventual implementation of number pooling in the 707 NPA at a later date.

The eventual use of number pooling in the 707 NPA offers promise as one of the tools to defer the need for subsequent new area codes and to make better use of number resources.

2. Return of NXX Codes

We shall require carriers to return unused NXX codes in the 707 NPA, and to implement other number management practices, consistent with the FCC's September 15 order. We direct our staff to work with the industry and the NANPA to implement the return of underused NXX codes. In the meantime, we direct the NANPA to determine whether any NXX codes assigned in the 707 area code have not been activated in the time frame allowed pursuant to industry guidelines. In the event that the NANPA determines some NXX codes in the 707 NPA have not been timely activated, we direct the NANPA to seek return of those codes. We further direct the NANPA to report to us by June 30, 2000 the status of its actions pursuant to this directive.

3. Utilization Study for 707 NPA

A prerequisite for the process of requiring the return of unused or underutilized NXX codes and blocks of 1,000 numbers is to determine the utilization of NXX codes which have already been assigned within the 707 NPA. The Commission initiated this process in D.98-05-021, which required Pacific and GTEC to report the percentage utilization rate for all blocks of 1,000 numbers within the NXX codes assigned to them. We will extend the reporting requirement adopted in D.98-05-021 to apply to all carriers holding NXX codes in the 707 NPA as we did for those in the 310 NPA. Moreover, more detailed reporting than was previously ordered is necessary to get a true picture of number utilization.

The Industry Numbering Committee (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 number pooling 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.

As a step toward the establishment of number pooling, the assigned ALJ has solicited comments concerning what sorts of NXX code reporting requirements or other measures may be appropriate to protect existing 1,000-number blocks from undue "contamination" pending the implementation of number pooling. We shall place a high priority on the expedited implementation of number pooling in the 707 NPA and conducting a study of current usage.

Based on the results of utilization studies, we will order carriers to return codes to the NANPA that are not activated. Telecommunications Division (TD) should immediately initiate measures to design and conduct a study of NXX code utilization in increments of 1,000-number blocks for each NXX code assigned within the 707 NPA. TD may procure consulting services to conduct the study or portions of it and guide the study's design to provide the most useful information. Since we have previously ordered a code utilization study for the 310 NPA, we expect to use the work done there as basis for the subsequent design of the 707 NPA study. TD should file and serve a report on the results of the NXX code utilization study for the 707 NPA no later than April 28, 2000.

While we are in the process of collecting code utilization data, and identifying unused NXX codes which can subsequently be reallocated to other carriers, we will build on the work already begun for implementing number pooling in the 310 NPA. The assigned ALJ issued a ruling, dated April 1, 1999, soliciting comments concerning the types of NXX code reporting requirements or

other measures needed to protect existing 1,000-number blocks from undue contamination pending the implementation of number pooling.

The ALJ assigned will also issue any other necessary rulings delineating the process as to how each code holder within the 707 NPA shall provide necessary information concerning NXX code utilization rates. The returned information shall be treated confidentially and kept under seal for a period of two years. It is therefore not necessary for parties to file motions for confidential treatment of the provided information. We intend to issue a decision on this and related matters at a later date.

B. Adopted Up Relief Plan for 707

We herein adopt the proposed 3-way geographic split (Alternative 4A) for the 707 NPA. We do so following an extensive process of review by industry members and the NANPA which we describe briefly.

1. 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. Members of the industry met to develop alternatives for exhaustion relief in the 707 NPA, based on criteria adopted by the industry for evaluating previous relief plans. The criteria prescribe that a relief plan should:

- 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 ten 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 lifetimes of more than 15 years, should be avoided.
- g. Comply with state and federal statutes, rulings and orders.

The NANPA also met with the Telecommunications Industry Planning Team to discuss and develop relief alternatives for the 707 NPA. This team is composed of the NANPA, California Public Utilities Commission (CPUC) Staff, and current and prospective local exchange carriers. Representatives of the California telecommunications industry developed relief alternatives in meetings facilitated by NANPA.

Public meetings to present various relief alternatives under consideration were required to occur within six months of the initial customer notification, i.e., by June 1999. The industry team held four public meetings in Vallejo, Santa Rosa, and Ukiah (one more than required by the Public Utilities Code) to ensure adequate coverage of the area served by the 707 NPA. The industry conducted the public meetings on May 11, 13, and 25, 1999, respectively.

The Industry, NANPA, and the CPUC also jointly conducted a meeting with local jurisdictions on April 14, 1999. This kind of meeting assists in the relief planning process by obtaining another layer of public input to help the

industry in either reducing the number of alternatives or identifying the best plan to present to the general public.

The industry presented a total of nine (9) relief alternatives at this meeting: Alternatives 1A, 1B and 1C (three-way geographic splits), Alternatives 4A, 4B and 4C (other three-way geographic splits), Alternatives 6A and 6B (a two-way geographic split with a subsequent overlay), and Alternative 11 (an overlay). Representatives were asked to express their support for the alternatives presented by filling out a "Show of Interest" form.

The total of Show of Interest form preferences, including both the Local Jurisdiction and Public Meetings and written comments received, provided the following results:

| | |
|---|-------|
| • 4 indicated a preference for Alternative 1A | 28.5% |
| • 3 indicated a preference for Alternative 1B | 21.4% |
| • 0 indicated a preference for Alternative 1C | 0.00% |
| • 2 indicated a preference for Alternative 4A | 14.3% |
| • 3 indicated a preference for Alternative 4B | 21.4% |
| • 0 indicated a preference for Alternative 4C | 0.00% |
| • 0 indicated a preference for Alternative 6A | 0.00% |
| • 0 indicated a preference for Alternative 6B | 0.00% |
| • 2 indicated a preference for other or none of the above | 14.3% |

There was no dominant expression of support for any particular relief alternative presented to the local jurisdictions and public. There was a general expression of support for a straight geographic split in some form versus a split followed by an overlay, and a common sentiment of "don't change my area code." Those favoring split Alternative 1 supported retaining the 707 NPA in the south; those favoring split Alternative 4 favored retaining the 707 NPA in the north.

The "Show of Interest" does not purport to reflect a cross-section of all customers, but is a means of providing the industry with input on the relief

alternatives presented, by gathering comments and issues of concern to those attending the local jurisdiction and public meetings. While local jurisdictions were invited to attend both the local jurisdiction meeting and all Public Meetings, many jurisdictions did not send a representative to indicate their preference for any of the relief alternatives or provide the industry with any other input.

The public also provided input by letter. Copies of all public letters received were included as an attachment to the relief plan proposal submitted by the industry.

2. Proposed Relief Plan Alternatives

The industry could not reach consensus on one relief plan. However, the industry was able to reach consensus on forwarding two exhaust relief alternatives to the Commission. On June 7, 1998, the industry directed the NANPA to forward Alternatives 4A (a three-way geographic split) and 6A (a two-way geographic split with a subsequent overlay) to the Commission for a final decision. By letter to the assigned ALJ dated July 30, 1999, Lockheed Martin IMS, in its role as the NANPA, presented these two alternative NPA relief plans for the 707 area code. On behalf of the industry NANPA requests, that the Commission approve one of these plans.

Each of the two proposed relief plans presented by the NANPA would be accomplished in two phases, by implementation of two new area codes, either as a three-way split or a two-way split with a subsequent overlay.

a. Alternative # 4A – (3-Way Geographic Split)

This two-phase relief alternative provides for the dividing of the current 707 NPA into three sections, to be served by the existing 707 NPA and two new area codes. The boundary lines and assigned rate centers for the new area codes are depicted in Appendix A. The 707 NPA NXXs currently at the

Tandem would remain in the 707 NPA. Under this alternative, the northern part of the area currently served by the 707 NPA would retain the 707 NPA and seven-digit dialing. When the approved relief plan is implemented, the southern and central parts of the area currently served by the 707 NPA would be served by two new area codes to be implemented in separate phases, respectively.

The first new area code would be assigned in Phase 1 to the southernmost region of the current 707 NPA, covering the Benicia, Dixon, Fairfield-Suisin, Rio Vista, Vacaville, and Vallejo rate centers. The second new area code would be assigned in Phase 2 to the central region of the current 707 NPA, covering 26 rate centers. This plan incorporates the desire of many local jurisdictions and existing businesses, service organizations and residents in the area to retain seven-digit dialing within their home area code. The plan further would permit the northern region, which is primarily rural and undergoing minimal growth, to not suffer the economic impact of a new area code. The demand for more NXX codes is not being driven by the northern area.

Based on the information reported by the NANPA, the 707 NPA is projected to last 15 to 18 years following implementation of the 3-way splits, and the new area codes would have projected lives of seven to ten years before additional relief would be required.

b. Alternative # 6A (2 Way-Geographic Split with Subsequent Overlay)

Alternate 6-A is a two-phase relief alternative that provides for the division of the current 707 NPA into two sections. A new area code would serve the southern region now served by the 707 area code (introduced in Phase 1) and a new overlay area code would be implemented approximately one year later, (in Phase 2), over the same area served by the new area code introduced in

Phase 1. The boundary lines and assigned rate centers for the new area codes under Alternative 6A are depicted on the map in Appendix B.

During Phase 1, all customers in the remaining 707 NPA and the first new NPA would retain seven-digit dialing within their home area codes. In Phase 2, the overlay area code is introduced in the southern area. At that point, seven-digit dialing would continue only within the northern region retaining the 707 area code, but calls made within the overlay area would be required to use a 1 + 10-digit dialing pattern.

Based on the information reported by NANPA under this alternative, the 707 NPA would have a projected life of 9-10 years before additional relief would be required. The two new area codes serving the southern area would have a projected life of 10-11 years before additional relief would be required.

c. Implementation Schedule

Implementation of the first new area code under either of the above plans is proposed by the industry to begin in December 2000 and be completed in September 2001. Implementation of the second new area code under Alternative 4A is proposed to begin in October 2001 and be completed in July 2002. Under Alternative 6A the second new area code would begin implementation in October 2001 and be completed in April 2002 (under an accelerated implementation schedule recommended by the industry). These proposed implementation dates were scheduled in conjunction with the Statewide Master Area Code Relief Calendar to avoid holidays and weekdays so as to minimize disruption to the public.

The industry reached unanimous agreement to recommend that if Alternative 6A is adopted, introduction of an overlay NPA should occur simultaneously with the commencement of mandatory 1 + 10-digit dialing. In

addition, the industry recommends the 707 NPA remain in lottery even after implementation of any new overlay area code, with any NXX codes not assigned to new entrants or reserved in accordance with FCC requirements returned to the lottery pool each month until all NXXs have been assigned (technical exhaust). To meet statutory requirements, the industry has agreed upon the following implementation schedules:

ALTERNATIVES 4A or 6A (Phase 1)

| | Relief Schedule |
|--------------------------------------|------------------------|
| Start of Permissive Dialing Period | 12/02/2000 |
| Start of Mandatory Dialing Period | 06/02/2001 |
| End of Mandatory Dialing/Relief Date | 09/08/2001 |

ALTERNATIVES 4A (Phase 2)

| | Relief Schedule |
|--------------------------------------|------------------------|
| Start of Permissive Dialing Period | 10/13/2001 |
| Start of Mandatory Dialing Period | 04/13/2002 |
| End of Mandatory Dialing/Relief Date | 07/13/2002 |

ALTERNATIVES 6A (Phase 2)

| | Relief Schedule |
|---|------------------------|
| Start of Formal Permissive Dialing | 10/13/2001 |
| Start of Mandatory 1 + 10 Digit Dialing Period | 04/13/2002* |
| Implementation of Overlay/Relief Date *Based on information provided by CPUC Staff and the 310 PEP results, the industry reached unanimous agreement to recommend that introduction of an overlay NPA should occur simultaneously with the commencement of mandatory 1+10 digit dialing. | 07/13/2002* |

C. Parties' Positions

The 707 NPA relief planning team participants were given the opportunity to submit position papers as an addendum to NANPA's submittal on a preferred NPA relief plan. Two position papers were submitted: one from Pacific, in support of Alternative 6B, and a joint position paper on behalf of ICG Telecom Group, MCI WorldCom, FirstWorld Communications and CCTA (Joint Parties) in support of Alternative 4A.

The Joint Parties feel that Alternative 4A best provides customers their stated preferences. In public meetings, customers stated that they want to maintain seven-digit dialing, maintain geographic identity, and have relief, which provides longevity. The joint parties' point out that each of the geographic regions subject to the three-way split has distinctive characteristics is preserved in the three-way split contemplated under Alternative 4A.

Under Alternative 4A, a new area code would be separately implemented in the central and southern sections, while the northern section would retain the 707 NPA. The northern area is highly identified with the logging industry, which is currently in decline, and is comprised of many small businesses that would be economically disadvantaged by the introduction of a new area code. This area is the least responsible for the code expansion and consumption within the 707 area code that is driving the need for relief. In the future, the north is also the most likely area currently within the 707 NPA to continue growing at a slower pace. The central section includes rural areas combined with a core urban area that is supported by the wine industry. This central area encompasses 26 rate areas with approximately 256 working codes; 50 of these codes provide service to customers of wireless service providers which

are homed on the Santa Rosa Access Tandem within the central area. By providing this area with its own area code, customers maintain seven-digit dialing within their own area code.

The southern section is more densely populated than the central section, but has fewer NXX codes and rate areas. A large portion of the customers in this section work in the 415/510/925 NPA's (San Francisco Bay Area) or the 916/530 NPA's (Sacramento area) and are familiar with area code changes. This section has the potential for large growth in both residential and business environments. Proponents claim that providing this region with a new area code enables growth for a period of eight – ten years before additional relief is projected to be required and allows customers to maintain seven-digit dialing.

Pacific submitted a separate position paper, arguing that the Commission should not select either of the two alternatives submitted by NANPA on behalf of the industry. While Pacific's first choice would be an overlay of the entire 707 NPA (Alternative 11), Pacific recognizes that the single overlay was not supported by the industry because of the large rural sections served by the 707 area code. Instead, Pacific recommends Alternative 6B, a variation of Alternative 6A (2-way split followed by an overlay). With Alternative 6B, the southern side of the split line keeps 707 but gets an overlay in Phase 2. The north gets the new NPA in Phase 1 and retains seven-digit dialing.

Pacific claims that Alternative 6B is the preferred solution because:

1. It retains the 707 area code in the strong agricultural and heavily populated southern section.
2. It avoids the need for the agricultural industry to contact national and international customers, suppliers, commercial buyers, etc. about an impending change in the area code.
3. It preserves seven-digit dialing in the more rural northern area.

The Commission, in its 760 NPA decision, rejected a proposal similar to Alternative 6A, concluding that changing a community's area code and then overlaying the same area was not a viable solution. Under such a scenario, the benefit of an overlay (not changing the area code) is lost, yet the region is hit with two new area codes. Pacific believes that 6A is a similar, losing proposition.

Pacific also opposes Alternative 4A, the 3-way split, arguing that the area code change would harm the international identity common to Sonoma and Napa Counties, in the short term. If the objection to an overlay is the 1+10-digit dialing, Pacific contends that the incidence of 1+10-digit dialing increases exponentially if a 3-way split is implemented. Splits shrink the territory covered by an NPA, thus, Pacific claims preserving "geographic identity" becomes a very weak argument.

While implementation of numbering optimization measures, may slow the need for future area code relief, Pacific claims that such number optimization measures will not provide relief to an NPA approaching exhaust, such as the 707 NPA. With the 30-month planning cycle required by the statute, Pacific doubts whether such measures could arrive in time to prevent another round of relief planning and community disruption if Alternative 4A were selected. Both splits, which include the most southern portion of the original 707 area code, have relatively short projected lives.

D. Discussion

Impacts on Customers of the Relief Alternatives

As we have noted in previous decisions, neither an overlay nor a geographic split is free of problems, and no plan can avoid disruptions to customers. On balance, however, we conclude that Alternative 4A (the three-way split) would provide less overall disruption to customers than either

Alternative 6A or 6B. Thus, we adopt Alternative 4A as relief plan. The three-way split will permit all existing customers in the area to continue to use seven-digit dialing and preserve the distinct geographic identity of each region. Finally, the residents of the 707 area code affected by this split have not had a change in their area code since 1959, when the 707 area code was established. Therefore, the impacts of a change in the 707 NPA should prove less burdensome compared with other NPAs that have gone through multiple area code changes in recent years.

In addition to satisfying the criteria for competitive neutrality, Alternative 4A, the three-way split, will also best satisfy the remaining criteria for evaluation of relief plans identified above, and provide the best overall remedy for 707 NPA relief when compared against the alternative back up plans.

The potential merits of splits versus overlays were reflected in the results of the consumer surveys reviewed in D.96-12-086 in which respondents expressed preferences for splits or overlays. Respondents in the survey expressed a greater preference for splits compared with overlays at the time the survey was taken. Since the last split creating the 707 NPA occurred so long ago, we can reasonably expect the residents of the 707 to maintain their preferences for a split.

By contrast, Alternative 6A would force all customers in the central and southern sections to undergo both an area code split and an overlay in the same period of time it would take to implement the three-way split. We find it unfair to subject these customers to the disadvantages of both splits and overlays. Alternative 6B is likewise unfair to customers in the northern section which would have to take the NPA even though they have not caused the growth in demand for NXX codes.

We also find Alternatives 6A and 6B unacceptable because they would impose an overlay and mandatory 1+10-digit dialing on a majority of customers in the 707 NPA.

With an overlay as proposed under either Alternative 6A or 6B, the NPA boundary would not change, but 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) NPA's. 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 if multiple NPA's 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. Thus, 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.

The proposed three-way split provides for a reasonable boundary that respects communities of interest, and offers customers the ability both to retain a unique geographic identification and to retain seven-digit dialing for calls within their own NPA. In the consumer preference surveys reviewed in D.96-12-086, customers generally placed significant value on the ability to dial only seven digits for calls within the NPA. The overlay would require customers to learn a new 1+10 digit dialing procedure for all calls within the same NPA. The intense public dislike of 11-digit dialing in other NPA's makes the successful implementation of an overlay here uncertain. Moreover, as we have found in the implementation of 11-digit dialing, devices such security alarm systems will

need to be reprogrammed and some require replacement. A split avoids these costs. Thus, the three-way split, which is practical in this situation, offers a sure method for providing number relief to this area.

The adopted relief plan permits the northernmost region of the 707 NPA to retain the existing area code while two new area codes are assigned to the southern and central regions, respectively. This is a fair outcome since the exhaustion of NXX codes is being driven by the growth in demand in the southern and central regions. The adopted plan preserves the distinct communities of interest in each of the three regions, providing a unique area code and seven-digit dialing within each NPA region.

III. Conclusion

On balance, we conclude that, while both the split-and-subsequent overlay and three-way geographic split will have certain adverse impacts to the extent they disrupt the status quo, the Alternative 4A three-way geographic split will have less overall adverse impacts than the Alternative 6A or 6B split-and-overlay alternatives proposed for the 707 NPA. Accordingly, we approve the geographic three-way split (Alternative 4A) and the proposed implementation schedule.

IV. Comments on Draft Decision

The draft decision of the ALJ in this matter was mailed to the parties in accordance with Pub. Util. Code § 311(g) and Rule 77.1 of the Rules of Practice and Procedure on October 19, 1999. Comments were received on November 8, 1999 and reply comments were received on November 15, 1999. We have taken the comments into account, as appropriate, in finalizing this order.

Findings of Fact

1. A proposed area code relief plan was submitted to the Commission due to the impending exhaustion of NXX codes in the 707 NPA projected to occur during the first quarter of 2001.

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 707 NPA.

3. The Industry Team eliminated alternative plans, which failed to meet the designated criteria, but was unable to reach consensus on a single relief plan.

4. The Industry Team narrowed the alternatives to two options: (a) a two-way split and subsequent overlay; and (b) a three-way geographic split.

5. 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.

6. 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.

7. The 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.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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 for the eventual implementation of number pooling.

14. With an overlay, as proposed under Alternative 6A-Phase 2, customers will experience the loss of seven-digit dialing for calls within the same NPA.

15. 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.

16. Although customers in the 707 NPA may already be accustomed to dialing 1+10 digits for a portion of their calls, the overlay proposed under Alternative 6A would still require them to learn that calls within the same area code also require 1+10-digit dialing.

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

18. While both overlays and geographic splits have certain adverse impacts, the proposed three-way geographic split (Alternative 4A) would have less overall adverse impacts than the split-and-overlay (Alternatives 6A or 6B) for the 707 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 section 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 lifetimes of more than 15 years, should be avoided.
- g. Comply with state and federal statutes, rulings and orders.

2. The proposed three-way geographic split (Alternative 4A) represents the best relief plan based upon the criteria applied by the Industry Team.

3. The proposed Alternative 4A three-way geographic split plan should be approved in accordance with the terms and conditions adopted in the order below.

4. A further record should be developed concerning the prospects for more efficient NXX code utilization for rate centers within the 707 NPA, as directed in the ordering paragraphs below.

5. The Commission should proceed to develop measures to promote more efficient utilization of numbering resources in the 707 NPA.

6. The Commission has already initiated a number pooling trial in the 310 and 818 NPAs.

7. The FCC has authorized that after having implemented a thousands-block pooling trial in one MSA, the Commission may expand the trial to other MSAs provided that carriers be allowed sufficient time to undertake any necessary transitional steps.

8. It would be premature to order a number pooling trial for the 707 NPA at this time.

9. The future implementation of number pooling in additional areas, including the 707 NPA, needs to be sequenced and scheduled on a staggered basis in view of network reliability concerns and in conformance with the authority delegated by the FCC.

10. The Commission should make a further assessment of appropriate measures needed to protect existing 1,000-number blocks from contamination pending the eventual implementation of number pooling in the 707 NPA.

O R D E R

IT IS ORDERED that:

1. The proposed three-way geographic split (Alternative 4A) as set forth in Appendix A is approved for the 707 Numbering Plan Area (NPA).

2. The North American Numbering Plan Administrator (NANPA) and the telephone corporations, including paging companies and resellers, are hereby

ordered to proceed with all due diligence to expeditiously implement the approved 707 NPA Alternative 4A relief plan, with the new area codes to take effect under the following schedules:

ALTERNATIVE 4A (Phase 1)

| Event | Relief Schedule |
|--------------------------------------|-----------------|
| Start of Permissive Dialing Period | 12/02/2000 |
| Start of Mandatory Dialing Period | 06/02/2001 |
| End of Mandatory Dialing/Relief Date | 09/08/2001 |

ALTERNATIVE 4A (Phase 2)

| Event | Relief Schedule |
|--------------------------------------|-----------------|
| Start of Permissive Dialing Period | 10/13/2001 |
| Start of Mandatory Dialing Period | 04/13/2002 |
| End of Mandatory Dialing/Relief Date | 07/13/2002 |

3. No later than February 2000, the NANPA shall notify the general public regarding the new area codes to be assigned, through a three-way geographic split of the existing 707 area code. The notice shall set forth the schedule for the permissive and mandatory dialing periods for the new area codes to be activated, and specify the geographic areas to be covered by the old and new area codes.

4. Each telephone corporation, including paging companies and resellers, serving the geographic area covered by the existing 707 NPA shall give written notice to its affected customers of the adopted 707 NPA relief plan schedules as

prescribed in Ordering Paragraph 3, without delay and no later than February 2000.

5. Each telephone corporation serving the existing 707 NPA shall provide a second notice of the schedule for the new area code implementation and affected geographic areas within three months of the new area code opening.

6. The NANPA shall provide nationwide notification of the adopted 707 NPA relief plan by no later than January 2000.

7. The Commission's Telecommunications Division (TD) shall administer a study of NXX code utilization in increments of 1,000 for each NXX code assigned within the 707 NPA.

8. The Administrative Law Judge assigned to this docket will issue a ruling delineating the process whereby code holders within the 707 NPA shall provide necessary information concerning NXX code utilization rates. The TD shall develop a plan and procedures for the return of underutilized NXX codes in the 707 NPA. The TD shall take all other necessary steps to implement number consideration measures set forth herein.

9. As a preliminary measures, carriers serving rate centers in the 707 NPA shall, within 30 days of the effective date of this order, identify and reserve all numbers that have not been used in blocks of 1,000 to the extent those number blocks are less than 10% subscribed. Carriers shall not further contaminate 1,000 number blocks by using any numbers in those blocks in cases where the carrier has the option to use other number blocks that are more than 10% subscribed. Carriers who fail to comply with this order shall be subject to penalties.

10. The TD shall file and serve a report on the status of the code utilization study on or before by April 28, 2000.

11. The NANPA shall file and serve a report on the status of the return of unused codes in the 707 NPA by June 30, 2000.

This order is effective today.

Dated December 16, 1999, at San Francisco, California.

RICHARD A. BILAS
President
HENRY M. DUQUE
JOSIAH L. NEEPER
JOEL Z. HYATT
CARL W. WOOD
Commissioners

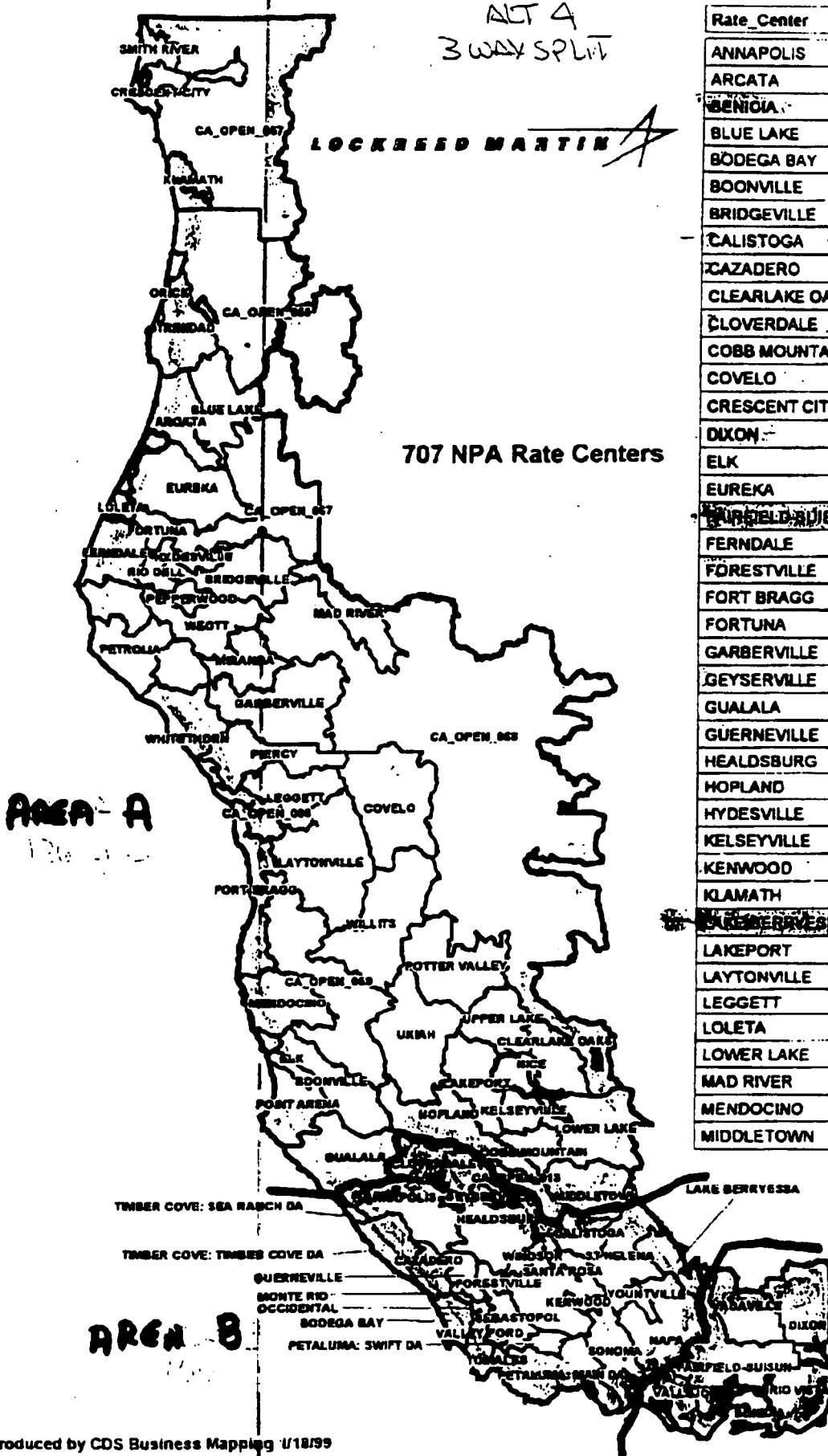
SUMMARY OF ALTERNATIVES CONSIDERED **707 NPA Exhaust Relief Plan**

| <u>Alternative #</u> | <u>Alternative Name</u> | <u>NPA Alternative Status / Dates:</u> |
|--|-------------------------------|--|
| 4A | 3-Way Split; 707 North | |
| Rate Centers Keeping Existing NPA (44): Alder Point, Arcata, Blue Lake, Boonville, Bridgeville, Clear Lake Oaks, Cobb Mountain, Covelo, Crescent City, Elk, Eureka, Ferndale, Ft. Bragg, Fortuna, Garberville, Gualala, Hopland, Hydesville, Kelseyville, Klamath, Lakeport, Laytonville, Leggett, Lolita, Laytonville, Leggett, Loleta, Lower Lake, Mad River, Mendocino, Middletown, Miranda, Nice, Orick, Pepperwood, Petrolia, Piercy, Point Arena, Potter Valley, Rio Dell, Smith River, Trinidad, Ukiah, Upper Lake, Weott, Willits and Windsor | | [X] Proposed to Local Jurisdictions 04/14/99 [X] Proposed to Public 05/11-27/99 [] Eliminated from Consideration __/__/__ [X] Industry-Recommended Plan 06/07/99 (One of two plans submitted) |
| Rate Centers To Be Assigned 1st New NPA (6): Benicia, Dixon, Fairfield-Suisin, Rio Vista, Vacaville and Vallejo | | |
| Rate Centers To Be Assigned 2nd New NPA (26): Annapolis, Bodega Bay, Calistoga, Cazadero, Cloverdale, Forestville, Geyserville, Guerneville, Healdsburg, Kenwood, Lake Berryessa, Monte Rio, Napa, Occidental, Petaluma: Main, Petaluma: Swift, Santa Rosa, Sebastapol, Sonoma, St. Helena, Timber Cove, Sea Ranch, Timber Cove: Timber Cove, Tomales, Valley Ford, Windsor and Yountville | | |

| Criteria for Evaluating Exhaust Relief Alternatives | Meets Criteria | Doesn't Meet | Explanation of Why / How Criteria Isn't Met |
|--|-----------------------|---------------------|--|
| 1. Minimizes end users' confusion | X | | |
| 2. Balances the cost of implementation for all affected parties | X | | |
| 3. Customers who undergo number change won't have to change again for 8-10 years | X | | |
| 4. Doesn't favor a particular interest group | X | | |
| 5. Covers a period of at least 5 years beyond predicted exhaust | X | | |
| 6. All codes in a given area exhaust about the same time in the case of splits | X | | |
| 7. Complies with State and Federal statutes, rulings and orders | X | | |

Appendix A

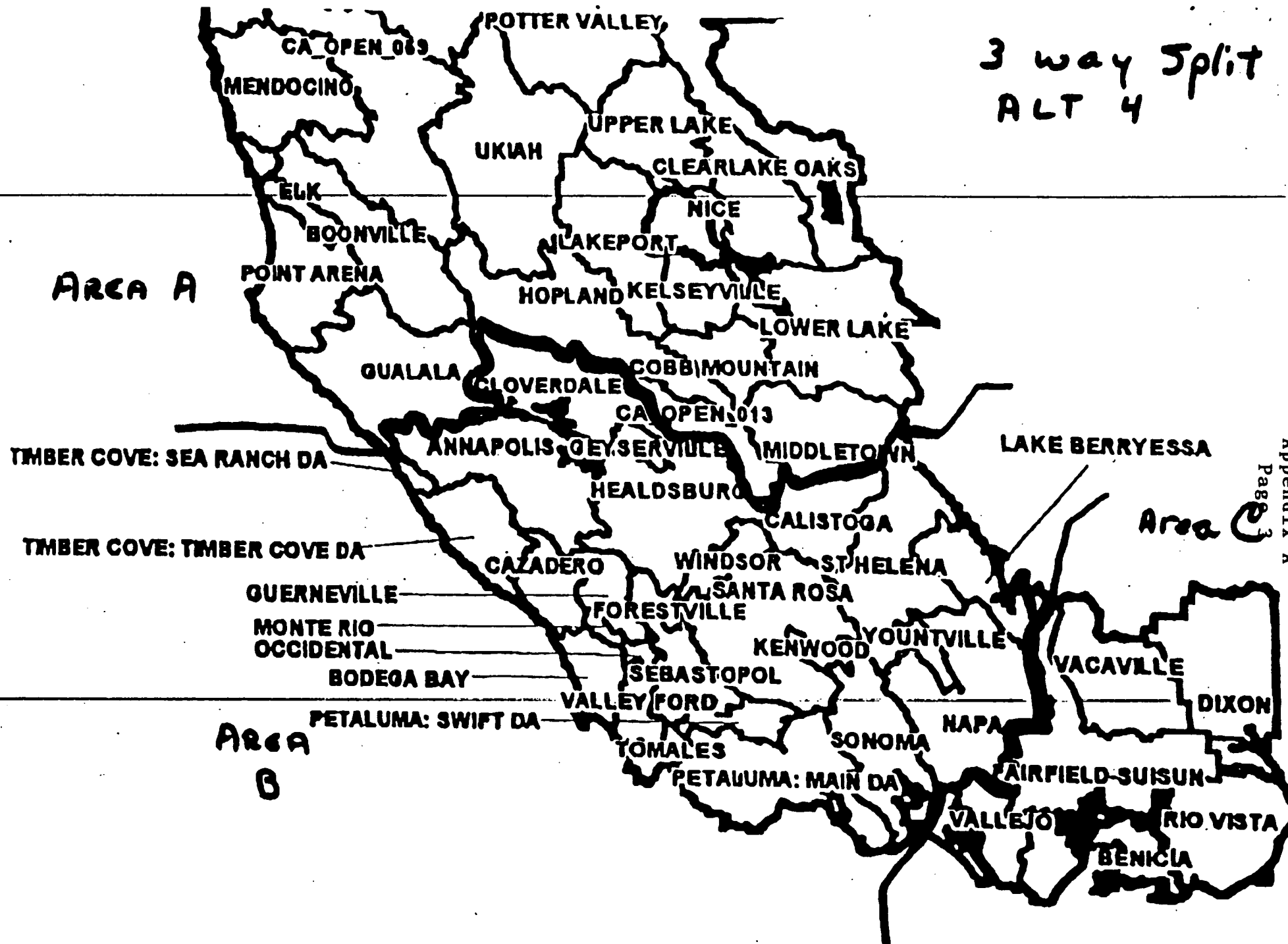
Page 2



| Rate_Center | Rate_Center |
|----------------|----------------------|
| ANNAPOLIS | MIRANDA |
| ARCATA | MONTE RIO |
| BENICIA | NAPA |
| BLUE LAKE | NICE |
| BODEGA BAY | OCCIDENTAL |
| BOONVILLE | ORICK |
| BRIDGEVILLE | PEPPERWOOD |
| CALISTOGA | PETALUMA: MAIN DA |
| CAZADERO | PETALUMA: SWIFT DA |
| CLEARLAKE OAKS | PETROLIA |
| CLOVERDALE | PIERCY |
| COBB MOUNTAIN | POINT ARENA |
| COVELO | POTTER VALLEY |
| CRESCENT CITY | RIO DELL |
| DIXON | RIO VISTA |
| ELK | SANTA ROSA |
| EUREKA | SEBASTOPOL |
| FERNDALE | SMITH RIVER |
| FORESTVILLE | SONOMA |
| FORT BRAGG | ST HELENA |
| FORTUNA | TIMBER COVE: SEA RAN |
| GARBerville | TIMBER COVE: TIMBER |
| GEYSERVILLE | TOMALES |
| GUALALA | TRINIDAD |
| GUERNEVILLE | UKIAH |
| HEALDSBURG | UPPER LAKE |
| HOPLAND | VACAVILLE |
| HYDESVILLE | VALLEJO |
| KELSEYVILLE | VALLEY FORD |
| KENWOOD | WEOTT |
| KLAMATH | WHITETHORN |
| LAKEPORT | MILLS |
| LAYTONVILLE | MINDSOR |
| LEGGETT | YOUNTVILLE |
| LOLETA | CA_OPEN_008 |
| LOWER LAKE | CA_OPEN_013 |
| MAD RIVER | CA_OPEN_067 |
| MENDOCINO | CA_OPEN_057 |
| MIDDLETOWN | CA_OPEN_058 |
| | CA_OPEN_059 |
| | CA_OPEN_068 |

3 way Split
ALT 4

Area A



(End of Appendix A)

Appendix A
Page 3

Area B

Area C

SUMMARY OF ALTERNATIVES CONSIDERED

707 NPA Exhaust Relief Plan

| <u>Alternative #</u> | <u>Alternative Name</u> | <u>NPA Alternative Status / Dates:</u> |
|---|--|--|
| 6A | 2-Way Split w/ Subsequent Overlay North 707 North | |
| <p>Rate Centers Keeping Existing NPA (44): Alder Point, Arcata, Blue Lake, Boonville, Bridgeville, Clear Lake Oaks, Cobb Mountain, Covelo, Crescent City, Elk, Eureka, Ferndale, Ft. Bragg, Fortuna, Garberville, Gualala, Hopland, Hydesville, Kelseyville, Klamath, Lakeport, Laytonville, Leggett, Loleta, Laytonville, Leggett, Loleta, Lower Lake, Mad River, Mendocino, Middletown, Miranda, Nice, Orick, Pepperwood, Petrolia, Piercy, Point Arena, Potter Valley, Rio Dell, Smith River, Trinidad, Ukiah, Upper Lake, Weott, Willits and Windsor</p> <p>Rate Centers To Be Assigned New NPA (32): Annapolis, Benicia, Bodega Bay, Calistoga, Cazadero, Cloverdale, Dixon, Fairfield-Suisin, Forestville, Geyserville, Guerneville, Healdsburg, Kenwood, Lake Berryessa, Monte Rio, Napa, Occidental, Petaluma: Main, Petaluma: Swift, Rio Vista, Santa Rosa, Sebastapol, Sonoma, St. Helena, Timber Cove: Sea Ranch, Timber Cove: Timber Cove, Tomales, Vacaville, Valley Ford, Vallejo, Windsor and Yountville</p> | | <p><input checked="" type="checkbox"/> Proposed to Local Jurisdictions 04/14/99</p> <p><input checked="" type="checkbox"/> Proposed to Public 05/11-27/99</p> <p><input type="checkbox"/> Eliminated from Consideration ___/___/___</p> <p><input checked="" type="checkbox"/> Industry-Recommended Plan 06/07/99 (One of two plans submitted)</p> |

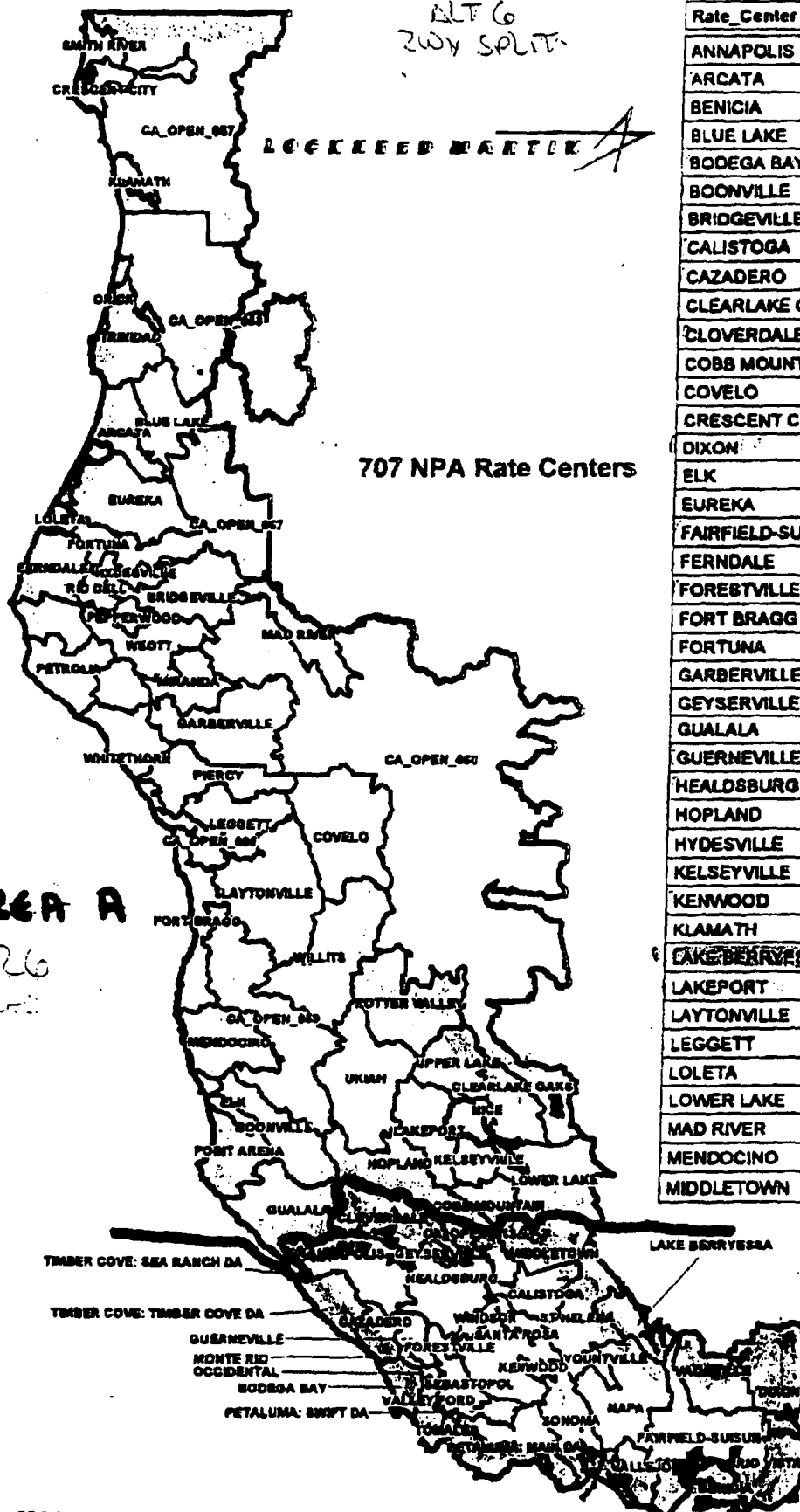
| Criteria for Evaluating Exhaust Relief Alternatives | Meets Criteria | Doesn't Meet | Explanation of Why / How Criteria Isn't Met |
|--|----------------|--------------|---|
| 1. Minimizes end users' confusion | X | | |
| 2. Balances the cost of implementation for all affected parties | X | | |
| 3. Customers who undergo number change won't have to change again for 8-10 years | X | | |
| 4. Doesn't favor a particular interest group | X | | |
| 5. Covers a period of at least 5 years beyond predicted exhaust | X | | |
| 6. All codes in a given area exhaust about the same time in the case of splits | X | | |
| 7. Complies with State and Federal statutes, rulings and orders | X | | |

SUMMARY OF ALTERNATIVES CONSIDERED

707 NPA Exhaust Relief Plan

| <u>Alternative #</u> | <u>Alternative Name</u> | <u>NPA Alternative Status / Dates:</u> |
|--|--|--|
| 6B | 2-Way Split w/ Subsequent Overlay North 707 South | |
| Rate Centers Keeping Existing NPA (32): Annapolis, Benicia, Bodega Bay, Calistoga, Cazadero, Cloverdale, Dixon, Fairfield-Suisin, Forestville, Geyserville, Guerneville, Healdsburg, Kenwood, Lake Berryessa, Monte Rio, Napa, Occidental, Petaluma:Main, Petaluma:Swift, Rio Vista, Santa Rosa, Sebastapol, Sonoma, St. Helena, Timber Cove: Sea Ranch, Timber Cove: Timber Cove, Tomales, Vacaville, Valley Ford, Vallejo, Windsor and Yountville Rate Centers To Be Assigned New NPA (44): Alder Point, Arcata, Blue Lake, Boonville, Bridgeville, Clear Lake Oaks, Cobb Mountain, Covelo, Crescent City, Elk, Eureka, Ferndale, Ft. Bragg, Fortuna, Garberville, Gualala, Hopland, Hydesville, Kelseyville, Klamath, Lakeport, Laytonville, Leggett, Loleta, Laytonville, Leggett, Loleta, Lower Lake, Mad River, Mendocino, Middletown, Miranda, Nice, Orick, Pepperwood, Petrolia, Piercy, Point Arena, Potter Valley, Rio Dell, Smith River, Trinidad, Ukiah, Upper Lake, Weott, Willits and Windsor | | [X] Proposed to Local Jurisdictions 04/14/99 [X] Proposed to Public 05/11-27/99 [X] Eliminated from Consideration 06/07/99 [] Industry-Recommended Plan 06/07/99 (One of two plans submitted) |

| Criteria for Evaluating Exhaust Relief Alternatives | Meets Criteria | Doesn't Meet | Explanation of Why / How Criteria Isn't Met |
|--|-----------------------|---------------------|--|
| 1. Minimizes end users' confusion | X | | |
| 2. Balances the cost of implementation for all affected parties | X | | |
| 3. Customers who undergo number change won't have to change again for 8-10 years | X | | |
| 4. Doesn't favor a particular interest group | X | | |
| 5. Covers a period of at least 5 years beyond predicted exhaust | X | | |
| 6. All codes in a given area exhaust about the same time in the case of splits | X | | |
| 7. Complies with State and Federal statutes, rulings and orders | X | | |



| Rate_Center | Rate_Center |
|------------------|----------------------|
| ANNAPOLIS | MIRANDA |
| ARCATA | MONTE RIO |
| BENICIA | NAPA |
| BLUE LAKE | NICE |
| BODEGA BAY | OCCIDENTAL |
| BOONVILLE | ORICK |
| BRIDGEVILLE | PEPPERWOOD |
| CALISTOGA | PETALUMA: MAIN DA |
| CAZADERO | PETALUMA: SWIFT DA |
| CLEARLAKE OAKS | PETROLIA |
| CLOVERDALE | PIERCY |
| COBB MOUNTAIN | POINT ARENA |
| COVELO | POTTER VALLEY |
| CRESCENT CITY | RIO DELL |
| DIXON | RIO VISTA |
| ELK | SANTA ROSA |
| EUREKA | SEBASTOPOL |
| FAIRFIELD-SUISUN | SMITH RIVER |
| FERNDALE | SONOMA |
| FORESTVILLE | ST HELENA |
| FORT BRAGG | TIMBER COVE: SEA RAN |
| FORTUNA | TIMBER COVE: TIMBER |
| GARBERVILLE | TOMALES |
| GEYSERVILLE | TRINIDAD |
| GUALALA | UKIAH |
| GUERNEVILLE | UPPER LAKE |
| HEALDSBURG | VACAVILLE |
| HOPLAND | VALLEJO |
| HYDESVILLE | VALLEY FORD |
| KELSEYVILLE | WEOTT |
| KENWOOD | WHITETHORN |
| KLAMATH | WILLITS |
| LAKE BERRYESSA | WINDSOR |
| LAKEPORT | YOUNTVILLE |
| LAYTONVILLE | CA_OPEN_008 |
| LEGGETT | CA_OPEN_013 |
| LOLETA | CA_OPEN_067 |
| LOWER LAKE | CA_OPEN_057 |
| MAD RIVER | CA_OPEN_058 |
| MENDOCINO | CA_OPEN_059 |
| MIDDLETOWN | CA_OPEN_068 |