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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 20, 2000

By Messenger

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **CC Docket No. 96-98; 616 NPA Relief Petition**

Dear Ms. Salas:

Enclosed for filing please find the petition of NeuStar, Inc, the North American Numbering Plan Administrator, on behalf of the Michigan telecommunications industry, for approval of a relief plan for the 616 area code.

Pursuant to Section 1.51(c) of the Commission's rules, an original and four copies of this letter are provided to the Secretary for inclusion in the record in the above-captioned proceedings.

Respectfully submitted,

Kimberly D. Wheeler
Counsel to NeuStar, Inc.

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED
APR 20 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Numbering Plan Area Relief Planning) CC Docket No. 96-98
for the 616 Area Code)
)
)

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE MICHIGAN TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc. (“NeuStar”), in its role as the North American Numbering Plan Administrator (“NANPA”) and acting on behalf of the Michigan telecommunications industry (“Industry”),¹ hereby petitions the Federal Communications Commission (“FCC”) for approval of an all-services distributed overlay relief plan for the 616 Numbering Plan Area (“NPA”).² NeuStar files the instant petition (“Petition”) with the FCC because the Michigan Public Service Commission (“PSC”) has taken the position that it does not have jurisdiction over NPA relief activities.³ Because the 616 NPA is projected to exhaust during the second quarter of 2001 and to ensure that there will be sufficient time to implement and complete the consensus overlay relief plan prior to exhaust of the 616 NPA, NeuStar requests expedited treatment of the instant Petition.

¹ The Industry is composed of current and prospective telecommunications carriers operating in or considering operations within the 616 NPA of Michigan.

² As the neutral third party administrator, NeuStar has no independent view regarding the relief option selected by the Industry.

³ See Letter from John Strand, Chairman, Dave Svanda, Commissioner, and Bob Nelson, Commissioner, to Yog Varma of 2/16/00, attached as Exhibit A.

I. BACKGROUND

Section 251(e)(1) of the Telecommunications Act of 1996 (“Act”)⁴ assigns plenary jurisdiction to the FCC over numbering issues pertaining to the United States. Specifically, the Act directed the FCC to create or designate an impartial entity to administer telecommunications numbering and to make such numbers available on an equitable basis. To this end, the FCC established and directed the North American Numbering Council (“NANC”),⁵ a federal advisory committee created to advise the FCC on numbering matters, to recommend an independent, non-government entity to serve as the NANPA.⁶ In October 1997, the FCC affirmed NANC’s selection of Lockheed Martin – now NeuStar⁷ – as the new NANPA.⁸ The FCC noted that NeuStar would execute

⁴ 47 U.S.C. § 251(e)(1) states:

The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis. The Commission shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction.

⁵ “The NANC was created under the Federal Advisory Committee Act, 5 U.S.C. App. 2 (1988), to advise the FCC and to make recommendations, reached through consensus, that foster efficient and impartial number administration.” Numbering Resource Optimization, Notice of Proposed Rulemaking, 14 FCC Rcd 10330 n.16 (1999).

⁶ *Administration of the North American Numbering Plan*, Third Report and Order and Third Report and Order, 12 FCC Rcd 23040, 23048 (1997) (hereinafter “Third Report and Order”).

⁷ The North American Numbering Plan administration and other numbering functions have been transferred from Lockheed Martin IMS to NeuStar, Inc. The FCC approved the transfer on November 17, 1999. *Request of Lockheed Martin Corporation and Warburg, Pincus & Co. for Review of the Transfer of the Lockheed Martin Communications Industry Services Business*, Order, FCC 99-346 (Nov. 17, 1999). The transaction closed on November 30, 1999. For convenience, the instant petition will refer to the NANPA as NeuStar.

⁸ See Third Report and Order, 12 FCC Rcd at 23041-42.

numbering administration functions such as NPA relief planning and central office code (often referred to as “CO” or “NXX” code) administration which had been previously performed by the incumbent local exchange carriers within each geographic area.⁹ After a transition period, NeuStar assumed NPA relief planning and CO code administration responsibilities for all states. NeuStar assumed responsibility for NPA relief planning and CO code administration for Michigan beginning on February 20, 1998 and March 29, 1999, respectfully.

During previous NPA relief efforts, the Michigan PSC has taken the position that it does not have jurisdiction over NPA relief activities, and informed NeuStar that it would not act on any NPA relief plans that NeuStar, on behalf of the Industry, recommended.¹⁰ During relief planning for the 810 NPA in Michigan, the PSC staff instructed NeuStar to implement NPA relief in the same fashion as prior relief efforts; *i.e.* for Industry members to decide upon and implement appropriate NPA relief. The FCC, however, questioned whether NANPA and the Industry could proceed with the implementation of NPA relief plans when the state regulatory authority disavowed

⁹ *See id.* at 23051-52.

¹⁰ In its determination that it does not have jurisdiction over NPA relief planning, the Michigan PSC relied on the Michigan Telecommunications Act (“Michigan Act”) which provides that “[e]xcept as otherwise provided by this act, the [PSC] shall not have the authority over a telecommunication service not specifically provided for in this act.” M.C.L.A. § 484.2401(2) (1999). The Michigan Act also mandates that “[i]n administering this act, the [PSC] shall be limited to the powers and duties prescribed by this act.” *Id.* § 484.2201(2). The Michigan Act, which was enacted in 1995, fails to specifically refer to NPA relief as within the PSC’s authority, however, the Michigan legislature, prior to the enactment of the Michigan Act, enumerated the general powers and jurisdiction of the PSC as “to hear and pass upon all matters pertaining to, necessary, or incident to the regulation of public utilities, including... communications agencies.” *Id.* at § 460.6.

jurisdiction. NANPA subsequently filed a petition with the FCC seeking approval of a relief plan recommended by the Industry for the 810 NPA.¹¹

The 1999 Central Office Code Utilization Survey (“COCUS”) projections for CO code demand indicated that the 616 NPA was projected to exhaust during the second quarter of 2002. Based upon the projected exhaust date and due to an unexpected increase in the demand for CO codes in the 616 NPA,¹² on November 29, 1999, NANPA declared the 616 NPA to be in jeopardy¹³ and notified the Industry and the PSC accordingly.¹⁴ Pursuant to the CO Code Assignment Guidelines, NANPA facilitated an Industry meeting on December 7, 1999, to discuss and develop a plan for rationing CO codes to extend the life of the 616 NPA until relief could be implemented. The Industry adopted final jeopardy procedures, establishing the rationing quantity of ten CO code assignments per month, beginning January 1, 2000. Based upon the final jeopardy

¹¹ See In the Matter of Numbering Plan Area Relief Planning for the 810 Area Code, CC Doc. No. 96-98, Petition of the North American Numbering Plan Administrator on Behalf of the Michigan Telecommunications Industry (Filed March 15, 2000). This petition is pending before the FCC.

¹² See Exhibit B for the history of CO code assignments in the 616 NPA. Exhibit C sets forth the history of CO code activity in the 616 NPA by rate center.

¹³ A “[j]eopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.” Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008, Jan. 10, 2000) § 9.3 (“CO Code Assignment Guidelines”). The CO Code Assignment Guidelines can be accessed on the ATIS Web site located at <<http://www.atis.org/atis/clc/inc/indocs/htm>>.

¹⁴ Interim jeopardy procedures, which provide for the assignment of only three CO codes per month, were implemented immediately upon declaration of Jeopardy. Pursuant to the CO Code Assignment Guidelines, the interim procedures, including the rationing of three CO codes per month, continue in effect until the Industry agrees upon the terms of the final jeopardy procedures.

procedures, the 616 NPA is currently projected to exhaust during the second quarter of 2001.¹⁵

Following the establishment of final jeopardy procedures, NANPA notified the Industry and the PSC on January 5, 2000 that relief planning for the 616 NPA needed to be addressed. The Industry met on February 16, 2000 in Grand Rapids, Michigan¹⁶ to discuss relief alternatives for the 616 NPA.¹⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA presented an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.¹⁸ The IPD set forth five relief alternatives: 1) a north-south two-way geographic split – referred to as Alternative #1 in the IPD; 2) a modification split boundary of the north-south two-way geographic split set forth in Alternative #1 – referred to as Alternative #2; 3) a two-way geographic split dividing the Grand Rapids metro area from the remainder of the 616 area – Alternative #3; 4) an all-services distributed overlay – Alternative #4; and 5) a concentrated growth overlay which overlays a new NPA over the Grand Rapids rate center – Alternative #5. A sixth alternative, a wireless only overlay, was proposed by an Industry member at the relief planning meeting.¹⁹

¹⁵ See 1999 Central Office Code Utilization Survey and NPA Exhaust Analysis January 18, 2000 Update, <<http://www.nanpa.com>>.

¹⁶ A copy of the meeting minutes, including a list of participants, is attached as Exhibit D.

¹⁷ In order to plan for the introduction of new area codes, NANPA and the Industry utilized the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 8, 1999) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic area in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

¹⁸ A copy of the IPD is attached as Exhibit E.

¹⁹ A description of Alternative #6 is included as an attachment to Exhibit D.

At the February 16 meeting, the participants discussed the six alternatives and reached consensus to recommend the all-services distributed overlay as the preferred means of relief for the 616 NPA. The Industry eliminated from consideration the geographic split relief alternatives because they either did not conform to the NPA Relief Planning Guidelines or another alternative provided greater relief. The Industry eliminated geographic split Alternatives #1, #2, and #3 because customers would have to change their telephone numbers for the second time in less than two years.²⁰ The Industry noted that the projected lives of the two resulting NPAs created by Alternative #1, four and ten years, were unbalanced and that a relief alternative with a projected life of less than five years does not conform to the NPA Relief Planning Guidelines.²¹ The Industry eliminated the concentrated growth overlay alternative, Alternative #5, because the short life of the area located outside of the overlay would require that the overlay NPA be extended to cover the remainder of the 616 NPA in less than one year. The Industry eliminated the wireless only overlay, Alternative #6, because FCC rules do not permit service specific overlays.²²

On March 17, 2000, NANPA provided the Michigan PSC with notice of the Industry's recommendation, and respectfully requested that the PSC notify NANPA of its decision to exercise jurisdiction in this matter within fifteen days of receiving notification or NANPA would file the Industry's recommended relief plan for the 616 NPA with the

²⁰ Mandatory dialing for the previous split of the 616 NPA was effective October 2, 1999. *See* NPA Relief Planning Guidelines § 5.0(f) (providing that customers should not have to undergo telephone number changes twice within a period of eight to ten years as a result of NPA relief activity).

²¹ NPA Relief Planning Guidelines § 5.0(a) (mandating that relief options shall cover a period of at least five years beyond the predicted date of exhaust).

²² 47 C.F.R. §52.19(c)(3)(i).

FCC. The Michigan PSC did not notify NANPA that it intended to exercise jurisdiction. Therefore, NANPA files the instant Petition seeking FCC approval.²³

II. DESCRIPTION OF THE PROPOSED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

The all-services distributed overlay plan would overlay the new area code over the same geographic area covered by the existing 616 NPA. All existing customers would retain their existing 616 area code and they would not be required to change their seven-digit telephone numbers. Consistent with FCC regulations, the Industry reached consensus to implement a 10 or 1+10-digit local dialing plan for calls placed both within and between the existing NPA and the overlay NPA.²⁴ CO codes in the new overlay NPA will be assigned upon request from service providers no sooner than sixty-six days prior to the effective date of the new area code. When the 616 NPA is exhausted of its supply of CO codes, all CO code assignments for the exhausted NPA will be made in the new overlay NPA.

During the February 16 meeting, Industry members reached consensus to adopt the following implementation schedule:

Beginning of permissive 10 or 1+10 digit local dialing:	April 7, 2001
Beginning of mandatory 10 or 1+10 digit local dialing:	August 11, 2001
Earliest effective date for new NPA CO codes :	August 25, 2001

Adhering to the recommended implementation schedule will avoid the denial or delay of service to telecommunications service providers' customers due to the unavailability of CO codes.

²³ See NPA Relief Planning Guidelines § 2.10 (stating that the appropriate regulatory commission (*e.g.*, state, province, country) has the ultimate authority to approve or reject a relief plan). See also 47 C.F.R. § 52.19(a) (1999) (stating that state commissions may resolve matters involving the introduction of new area codes within their states).

III. CONCLUSION

NeuStar, on behalf of the Industry, respectfully requests the FCC to approve the Industry's recommendation to implement an all-services distributed overlay as the means of relief for the 616 NPA. The Industry will begin implementing NPA relief once the FCC issues a final order approving the instant Petition. Because the 616 NPA is projected to exhaust its supply of CO codes during the second quarter of 2001, NeuStar requests expedited review of this Petition.

Respectfully submitted,



Cheryl A. Tritt
Kimberly D. Wheeler

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(202) 887-1500

Counsel for NeuStar, Inc.

April 20, 2000

²⁴ 47 C.F.R. §52.19(c)(3)(ii).

EXHIBIT A



State of Michigan
John Engler, Governor

Department of Consumer & Industry Services
Kathleen M. Wilbur, Director

Public Service Commission

6546 Mercantile Way
P.O. Box 30221
Lansing, MI 48209-7721
(517) 241-6100

Commissioners

John G. Strand
David A. Swartz
Robert E. Nelson

February 16, 2000

Mr. Yog Varma
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Mr. Varma:

This is to inform you of the Michigan Public Service Commission's position regarding our authority to exercise certain authority over area code assignments.

We understand your position that the states were delegated authority to supervise area code assignments in various FCC dockets including 96-333 and 97-372. However, this commission's position with respect to this issue has been consistent and was made clear to NeuStar (formerly Lockheed Martin IMS) representatives Stan Washer, Dan Gonas, and Sandy Tokarek on numerous occasions. This commission did not notify the FCC that it would take on the responsibility for area code relief. It was our understanding that area code initiation and development functions would be transferred to and performed by the new NANPA administrator, as referenced in FCC97-372, which we believed became automatic after the 120 day notification period expired. We were never advised by the FCC that by remaining silent the states were to be delegated new responsibilities.

In any event, the Michigan Public Service Commission can only exercise that authority which has been specifically delegated to it by the State Legislature via the Michigan Telecommunications Act. We realize that the Michigan Act may differ in many respects from those which govern the authority of other state commissions, however these differences were also made clear to the representatives from NeuStar who apparently did not communicate this situation to your office until recently.

The Public Service Commission continues to believe that, notwithstanding the FCC delegation, the Michigan Telecommunications Act does not provide the necessary jurisdiction for the Commission to accept the permissive delegation of federal authority.

As a practical matter, Neustar has already developed and is implementing 5 area code plans in concert with the telecommunications providers in this state. Michigan has also gone through 2 area code splits since the FCC order in 97-372, and these area code splits have occurred temporarily without our supervision.

Mr. Yog Varma
Page 2

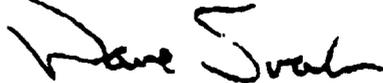
February 16, 2000

We do intend, however, to seek the necessary state authority as the Michigan Telecommunications Act is reviewed for amendment or replacement in advance of its sunset on 12/31/2000.

Sincerely,



John Strand, Chairman



Dave Syanda, Commissioner



Bob Nelson, Commissioner

EXHIBIT B

EXHIBIT B

STATUS OF CENTRAL OFFICE CODES IN THE 616 AREA CODE

<u>Status</u>	<u>Number of CO Codes</u>
Assigned NXXs	610
Protected	10*
Reserved	4
Hold	0
Test NXXs	8
Unavailable NXXs	16
Available NXXs	152
 Total	 800

- * NANPA has worked closely with Ameritech, the previous code administrator for Michigan, to determine the status of protected and reserved CO codes in the 616 NPA. Upon careful examination and comparison of each company's records, NANPA and Ameritech concluded that of the ten protected codes in the 616 NPA, eight can be removed from protected status and made available for assignment. These eight codes will be designated as available on May 1, 2000.

<u>Service Providers</u>	
ILEC	10
CLEC	5
CAP	2
Interexchange Carrier	1
Wireless	22
Reseller	0

CO Codes Assigned Per Month

<u>Apr</u>	<u>May</u>	<u>June</u>	<u>July</u>
3	5	5	5
<u>Aug</u>	<u>Sept</u>	<u>Oct</u>	<u>Nov</u>
5	4	3	60
<u>Dec</u>	<u>Jan-00</u>	<u>Feb-00</u>	<u>Mar-00</u>
3	4	0	1

Prepared by Cheryl Dixon
NANPA CO Code Administration
April 14, 2000

EXHIBIT C

EXHIBIT C

616 AREA CODE CENTRAL OFFICE CODE ACTIVITY BY RATE CENTER APRIL 1999-MARCH 2000

Rate Center	April-99	May-99	June-99	July-99	August-99	September-99	October-99	November-99	December-99	January-00	February-00	March-00
ADA												
ALLEGAN												
ALLENDALE												
ALTO												
ATHENS												
AUGUSTA												
BANFIELD												
BANGOR												
BARODA								2 assigned				
BATTLE CREEK		1 assigned 1 returned	1 assigned		1 assigned			4 assigned		1 assigned 1 returned		
BELDING												
BELLEVUE								1 assigned				
BENTON HARBOR			1 assigned					1 assigned	1 assigned			
BERRIEN SPRINGS												
BLOOMINGDALE												
BORCULO												
BRIDGMAN												
BUCHANAN				1 assigned				3 assigned				
BURR OAK												
BYRON CENTER												
CALEDONIA												
CASNOVIA								1 assigned				
CASSOPOLIS								2 assigned				
CEDAR SPRINGS							1 assigned	2 assigned				
CENTREVILLE												
CHEBOYGAN					1 assigned							
CLARKSVILLE								1 assigned				

OTSEGO													
PAW PAW				1 assigned				1 assigned					
PINE LAKE													
PLAINWELL													
PULLMAN													
RICHLAND													
ROCKFORD													
SAND LAKE (KENT)													
SARANAC													
SAUGATUCK													
SAWYER													
SCHOOLCRAFT													
SCOTTS													
SISTER LAKES													
SOUTH HAVEN							1 assigned	2 assigned		1 assigned			
SPARTA													
ST JOSEPH								2 assigned					
STURGIS								3 assigned					
THREE OAKS								1 assigned					
THREE RIVERS							1 assigned						
TRAVERSE CITY	2 returned		1 assigned										
TRUFANT													
UNION													
VANDALIA													
VICKSBURG													
WATERVLIET													
WAYLAND								1 assigned					
WHITEHALL													
WHITE PIGEON													
WOODLAND													
ZEELAND								1 assigned					
TOTAL	3 assigned 2 returned	5 assigned 1 returned	5 assigned 0 returned	5 assigned 0 returned	5 assigned 0 returned	4 assigned 0 returned	3 assigned 0 returned	60 assigned 0 returned	3 assigned 0 returned	4 assigned 1 returned	0 assigned 3 returned	1 assigned 1 returned	

EXHIBIT D

**Michigan 616 NPA
Relief Planning Meeting Minutes
February 16, 2000**

ATTENDANCE

The attendance list is attached.

WELCOME AND INTRODUCTIONS

Ms. Linda Hymans, NPA Relief Planner – Central Region, opened with introductions and objectives of the meeting. She stated that the previous relief process in Michigan was for the industry to develop a relief plan after which the industry would implement the consensus plan. The Michigan Public Service Commission (Commission) has not acted on any relief plans since NANPA began planning in Michigan in 1998. Ms. Hymans stated that this process would continue with the 616 NPA barring any changes in the regulatory process in Michigan.

Ms. Hymans reviewed the divestiture from Lockheed Martin IMS to NeuStar, Inc., and relief planning guidelines. She then explained that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process will be followed. She read the definition of *consensus* and explained how consensus is determined.

INITIAL PLANNING DOCUMENT REVIEW

Ms. Hymans reviewed the status of the 616 NPA as of February 11, 2000:

Total available NXX codes: 154
Code Assignment History:

June	5
July	5
August	5
September	4
October	3
November	57
December	3
January	4

Discussion took place about the fact that prior to implementation of the last relief in 616 on October 2, 1999, the NPA was in jeopardy. Also, the code assignments made in December reflect the interim jeopardy allocation but in January the jeopardy allocation of 10 NXX codes was not requested. It was determined that the surge in assignments in November could have resulted from pent-up demand after the jeopardy allocation.

The Initial Planning Document (IPD) was reviewed. Ms. Hymans stated that the IPD presented five possible relief alternatives and explained that some of the plans may not meet the guidelines but were included for discussion or were suggested during the pre-IPD conference call on January 12. Discussion followed on the individual alternatives.

Discussion took place as to the possible code demand in the NPA and the ability to accurately project code demand. There was also discussion about the public impact of announcing relief in 616 so soon after the previous split.

ADDITIONAL ALTERNATIVES FROM INDUSTRY

Omnipoint offered a contribution (see Attachment #1), and was titled Alternative #6. The alternative was a service-specific overlay. No other new alternatives were suggested by the participants.

DISCUSSION OF RELIEF ALTERNATIVES

Discussion took place about the alternatives and Beeples, Inc. made a statement for the record (see Attachment #2) in support of Alternative #4, an all-services distributed overlay. There was further discussion about whether the implementation schedule impacted 9-1-1 systems and the alarm industry. It was determined that the impact on 9-1-1 systems could not be assessed without further investigation. It was also determined that the alarm industry could proceed immediately with conversion of panels to 10 and 1+10-digit local dialing as most of the larger service providers have already implemented permissive 10 and 1+10-digit local dialing available.

ELIMINATION OF RELIEF ALTERNATIVES

Consensus was reached to eliminate the following relief alternatives:

- | | |
|------------------------|---|
| Alternative #1: | Two-Way Split |
| REASON: | Unbalanced projected lives which do not meet NPA Relief Planning Guidelines (a) that the plan last for at least 5 years and (f) that customers not have to undergo changes in telephone numbers for 8-10 years |
| Alternative #2: | Two-Way Split |
| REASON: | This alternative is less effective than #3 because of expected growth trends and does not meet NPA Relief Planning Guidelines (f) that customers not have to undergo changes in telephone numbers for 8-10 years. |
| Alternative #3: | Two-Way Split |
| REASON: | This alternative splits many local calling scopes therefore causing a mixture of 7 and 10-digit local calling which can cause customer confusion. |
| Alternative #5: | Concentrated Growth Overlay |
| REASON: | This alternative delayed relief in Area B for only one year which would then cause the Grand Rapids overlay to be extended |
| Alternative #6: | Service-Specific Overlay |
| REASON: | This alternative was eliminated because it does not adhere to FCC rules. |

RECOMMENDED RELIEF ALTERNATIVE

CONSENSUS was reached to adopt Alternative #4, an all-services distributed overlay, as the relief plan for the Michigan 616 NPA. Twelve companies were in support of the overlay and three companies were opposed.

Reasons for objection are that once an overlay is implemented, there is no realistic option for a split in the future, that 9-1-1 PSAP trunking and costs potentially increase in an overlay and Competitive Local Exchange Companies (CLECs) may need to increase their number resources due to Local Number Portability (LNP) for 9-1-1 trunking needs.

DIALING PLAN

CONSENSUS was reached for local dialing to be 10 or 1+10-digits. Because there is a mixture of dialing patterns, service providers will educate their customers to their appropriate dialing pattern.

IMPLEMENTATION SCHEDULE

Due to the fact that a two-way geographic split of the 616 NPA was recently completed in late 1999, there was discussion about whether to implement the overlay on a date-specific or to set trigger points so that the implementation does not occur before it is absolutely necessary.

CONSENSUS was reached to adopt the following timetable for implementation of the all-services distributed overlay plan:

- | | |
|--|-----------------|
| ▪ Beginning optional 10 or 1+10 digit local dialing: | April 7, 2001 |
| ▪ Required 10 or 1+10 digit local dialing: | August 11, 2001 |
| ▪ New NPA Central Office Codes effective no sooner than: | August 25, 2001 |

NOTIFICATION TO REGULATORY AUTHORITY

Ms. Hymans stated that NANPA would notify the Commission of the industry agreement and the proposed implementation schedule. Discussion took place about the timing of the press release to announce the relief plan. It was decided that the status of code availability and the timing of the request for a relief NPA code assignment will be discussed on the minutes review conference call (see below for details).

MEDIA RELATIONS

Ms. Hymans discussed the NeuStar Media interfaces (Barbara Blackwell, 202-533-2647 and Rebecca Barnhart, 202-533-2643) and explained how industry members may want to direct media questions relating to 616 NPA Relief to Ms. Blackwell or Ms. Barnhart. There was discussion about how NANPA Media Relations should be prepared to explain why relief is needed in the 616 NPA so soon after the last relief plan was implemented.

ACTION ITEMS

The impact of the overlay on 9-1-1 systems would be assessed by the service providers and be reported at the implementation meeting.

APPROVAL OF MINUTES AND COMMISSION NOTIFICATION LETTER

It was the consensus of the industry to distribute draft minutes by March 1 and convene via conference call on March 10, 2000 at 11 AM, EST to review the minutes and the draft Commission notification. The conference call dial-in number is 847-413-2931 with passcode 5054899#. After that meeting, a letter communicating the industry relief plan decision will be mailed to the Commission by March 17.

There was discussion about scheduling an implementation meeting and it was decided that the first implementation meeting would tentatively be held on April 11 in Grand Rapids. Several service providers requested a conference link and AT&T agreed to provide one for this meeting.

ATTENDEE LIST

Cassie Yang	Ameritech
Harry Semerjian	Ameritech Michigan
Scott Temple	Ameritech SBC Cellular
Matt Skoglund	Arch Communications
Denise Pearl	AT&T
Stan Weeks	AT&T
Jim Bender	Barry County Telephone
Vic Jackson	Beeples, Inc.
Kim Van Dellen	Centennial Cellular/Michiana
Gary Frey	Century Tel.
Paul Styler	Century Tel. Wireless
Wayne Ter Haar	Drenthe Telephone
Gordy Balcom	Engineered Protection Systems
Brad Grove	GTE
Denise Spires	GTE
Fred Westerfield	GTE
Paula Dunham-Zielinski	GTE
Suzanne Brooks	MCI Worldcom
Ben Childers	NANPA NPA Relief Planning
Linda Hymans	NANPA NPA Relief Planning
Joe Hurlbert	Nextel
Matt Wickert	Omnipoint Communications
Karen Kelly	US Xchange

ATTACHMENT #1

**OMNIPOINT COMMUNICATIONS
COMMENTS
Michigan NPA 616 Relief Planning Meeting
February 16, 1999**

OMNIPOINT COMMUNICATIONS MIDWEST OPERATIONS, LLC, IS A LEADING PERSONAL COMMUNICATIONS SERVICE LICENSEE AND SERVICE PROVIDER. IT BEGAN OFFERING PCS SERVICE IN THE DETROIT METROPOLITAN AREA DECEMBER, 1998; AND CURRENTLY PROVIDES ADVANCED WIRELESS COMMUNICATIONS SERVICES IN MUCH OF NEW YORK, NEW JERSEY, CONNECTICUT, EASTERN PENNSYLVANIA, DELAWARE, MASSACHUSETTS, NEW HAMPSHIRE, RHODE ISLAND, SOUTH FLORIDA, MICHIGAN, INDIANA AND SOME SERVICE IN MAINE, MARYLAND AND OHIO. OMNIPOINT COMMUNICATIONS INTENDS TO OFFER SIMILAR SERVICES IN THE FUTURE IN ADDITIONAL AREAS.

AS YOU ARE AWARE, WIRELESS CARRIERS HAVE A PROVEN RECORD OF EMPLOYING EFFICIENT ALLOCATION METHODS AND HIGH UTILIZATION RATES OF TELEPHONE NUMBERS. FOR THAT REASON, OMNIPOINT COMMUNICATIONS HEREBY RESPECTFULLY REQUESTS THAT THE MICHIGAN PUBLIC SERVICE COMMISSION, AND THE MICHIGAN TELECOMMUNICATIONS INDUSTRY RECONSIDER TECHNOLOGY-SPECIFIC OR WIRELESS-ONLY OVERLAYS AS A MEANS OF OPTIMIZING NUMBER RESOURCES.

IN THE PAST, OMNIPOINT COMMUNICATIONS HAS ADVOCATED TO BOTH THE INDIVIDUAL STATE UTILITY COMMISSIONS AND THE FEDERAL COMMUNICATIONS COMMISSION, FOR THE EMPLOYMENT OF EXPANDED OVERLAYS AS A MEANS OF ADDRESSING AREA CODE RELIEF. EXPANDED OVERLAYS, ALTHOUGH TECHNOLOGY-NEUTRAL CAN BE MOST READILY UTILIZED BY WIRELESS CARRIERS. UNFORTUNATELY, THESE OVERLAYS ARE DESIGNED TO BE MULTI-STATE, LEADING TO JURISDICTIONAL IMPLEMENTATION ISSUES.

MOST RECENTLY, SEVERAL STATES, INCLUDING CALIFORNIA, MASSACHUSETTS AND CONNECTICUT, HAVE RECOMMENDED THAT THE FCC GRANT AUTHORITY TO THE INDIVIDUAL STATES TO INVESTIGATE AND IMPLEMENT A WIRELESS-ONLY OVERLAY, IN SPITE OF THE REQUIREMENTS ADOPTED UNDER 47 C.F.R. PARAGRAPH 52.9. OMNIPOINT COMMUNICATIONS HEREBY REQUESTS THE MICHIGAN PUBLIC SERVICE COMMISSION JOIN THESE STATES IN REQUESTING SUCH RELIEF. WIRELESS-ONLY OVERLAYS ARE WORTH RECONSIDERING BECAUSE THEY PROMISE AN IMMEDIATE AND EFFICIENT SOLUTION FOR THE NUMBERING SCARCITY SUFFERED BY WIRELESS CARRIERS, WHICH FORM A SIGNIFICANT AND RAPIDLY GROWING PORTION OF THE INDUSTRY AND WHICH ARE LARGELY BLAMELESS FOR THE PROBLEMS FACING THE MICHIGAN PUBLIC SERVICE COMMISSION. OMNIPOINT COMMUNICATIONS WILL SUPPORT SUCH A PETITION TO THE FCC.

OMNIPOINT COMMUNICATIONS THEREFORE SUPPORTS A WIRELESS-ONLY AREA CODE FOR THE STATE OF MICHIGAN AND REQUESTS THAT THE MICHIGAN PUBLIC SERVICE COMMISSION REQUEST A WAIVER FROM THE FCC TO MODIFY ITS 1995 RULING AGAINST PERMITTING SUCH OVERLAYS, WHICH HAS SINCE BEEN CODIFIED IN SECTION PARAGRAPH 52.19 OF THE COMMISSION'S RULES. AS A WIRELESS CARRIER, OMNIPOINT COMMUNICATIONS ASSERTS THAT SERVICE-SPECIFIC OR TECHNOLOGY-SPECIFIC OVERLAYS ARE NO MORE DISCRIMINATORY, INHERENTLY ANTI-COMPETITIVE, OR HARMFUL TO CONSUMERS THAN THE CURRENT RATE CENTER METHODOLOGY UTILIZED BY LOCAL EXCHANGE CARRIERS. THE AMERITECH ORDER SOUGHT TO PROTECT WIRELESS CARRIERS AT A TIME WHEN THE FULL RECORD ON EFFICIENT WIRELESS INDUSTRY NUMBER UTILIZATION WAS NOT KNOWN. NOW THAT THE FCC HAS RECOGNIZED THE FULL RECORD ON WIRELESS NUMBER UTILIZATION EFFICIENCIES IN ITS MOST RECENT LNP FORBEARANCE ORDER, IT IS APPROPRIATE THAT THE FCC REVISIT THIS METHODOLOGY BECAUSE IT CLEARLY REMOVES THE INDUSTRY'S MOST EFFICIENT CARRIERS FROM THE CURRENT CRISIS IN MICHIGAN.

OMNIPOINT COMMUNICATIONS RECOMMENDS THAT THE MICHIGAN PUBLIC SERVICE COMMISSION CONSIDER THE FOLLOWING PARAMETERS FOR A WIRELESS-ONLY OVERLAY IN AN EFFORT TO ADDRESS AREA CODE EXHAUST AND NUMBER RESOURCE CONSERVATION: (A) MANDATORY ASSIGNMENT OF A NEW OVERLAY CODE TO ALL NEW WIRELESS CUSTOMERS, PAGING CUSTOMERS

AND WIRELINE CARRIERS; (B) MANDATORY REQUIREMENT THAT ALL NEW WIRELESS HANDSETS BE ASSIGNED TO THE NEW OVERLAY CODE; AND (C) AGREE THAT MANDATORY TEN-DIGIT DIALING WILL NOT BE REQUIRED OTHER THAN FOR DIALING BETWEEN NPAs. THESE PROPOSED GUIDELINES WOULD ENSURE THAT A HIGH UTILIZATION IS MAINTAINED, WOULD EASE THE DEMANDS PLACED ON EXISTING AREA CODES BY THE RAPID EXPANSION OF WIRELESS SERVICES, AND WOULD ENSURE THAT, EVENTUALLY, ALL NXXs WITHIN AN OLD AREA CODE WOULD BE RETURNED IN A MANAGEABLE FASHION, THEREBY RENEWING THE LIFE OF EXISTING NPAs. SUCH GUIDELINES WOULD ALLEVIATE THE DISCRIMINATION CONCERNS VOICED BY OTHER WIRELESS CARRIERS AGAINST WIRELESS-ONLY OVERLAYS.

MOST IMPORTANTLY, A WIRELESS-ONLY OVERLAY WOULD BENEFIT COMPETITION BY ALLOWING RAPIDLY GROWING WIRELESS CARRIERS SUPERIOR ACCESS TO TELEPHONE NUMBERS THAN EITHER OF THE CURRENT NPA RELIEF METHODS. IN A PRACTICE CARRIED OVER FROM SERVING TRADITIONAL WIRELINE CARRIERS, THE CURRENT ASSIGNMENT GUIDELINES ASSIGN NXX BLOCKS TO WIRELESS CARRIERS ON THE BASIS OF LANDLINE RATE CENTERS. WIRELESS TECHNOLOGY IS NOT TIED TO TRADITIONAL RATE CENTERS AND THEIR NUMBERING PARAMETERS, HOWEVER. IT IS OMNIPOINT COMMUNICATION'S BELIEF THAT THIS APPLYING RATE CENTERS TO WIRELESS SERVICES IS THEREFORE INEFFICIENT. MOREOVER, THE COMPETITION BETWEEN WIRELESS AND WIRELINE CARRIERS FOR SCARCE NXX RESOURCES

ON A RATE-CENTER-BY-RATE-CENTERS BASIS UNNECESSARILY STARVES WIRELESS CARRIERS OF THE NUMBERS THEY NEED TO PROVIDE SERVICE IN A COMPETITIVE MARKET. BECAUSE WIRELESS CARRIERS ARE ABLE TO SPREAD A SINGLE NXX BLOCK OVER A LARGER SERVICE AREA, AND BECAUSE THEY ARE THEREBY CAPABLE OF USING THEIR ALLOCATED NXX BLOCKS MORE EFFICIENTLY, A WIRELESS-ONLY OVERLAY PROMISES TO FREE WIRELESS CARRIERS FROM THE CURRENT CONGESTION.

ATTACHMENT #2

Page 1 of 2

Suggestion for 616 Numbering Plan Area (NPA) Exhaust Relief

Date: February 16, 2000

To: 616 NPA Code Holders
Other Interested Parties

Source: Vic Jackson,
Beeples, Inc. / Alger Communications
2377 Seminole Dr.
Okemos, MI 48864
Tel 517.381.2337

Introduction

In a letter dated November 29, 1999, Lockheed Martin IMS, (now NeuStar) in their capacity as the North American Numbering Plan Administrator, advised NXX code holders and Industry Members that the 616 NPA is in "jeopardy" of exhaust before a relief plan can be implemented. NeuStar has also advised the Industry that a meeting of Code Holders and Other Industry Members would be convened on February 16, 2000 in Grand Rapids, Michigan to plan for relief of the 616 NPA.

Discussion

Area code relief can be accomplished either by an overlay of some or all of the existing area code, or by splitting of the existing area code into two or more NPA's.

An overlay area code can be accomplished with minimal impact on existing subscribers in a minimum amount of time and at the minimum cost to existing carriers.

An area code split requires; a temporary period of permissive dialing involving both the new and the old area codes for a large number of subscribers, mandatory number changes for large numbers of subscribers, and cool down periods for the numbers that were in use in the old area code and have been made vacant by the implementation of the relief plan.

Currently, local calls must be dialed with either seven digits within an area code, or as permissive 11 digit dialing and as eleven digits in all other area codes.

Notice

The ideas and suggestions contained in this proposal are for discussion purposes only by the Industry Team for 616 NPA relief. Beeples, Inc. and/or Alger Communications reserves the right to modify or withdraw any or all portions of this document at any time.

Proposal for 616 Numbering Plan Area Relief.

The following 616 NPA relief plan will provide long term relief with minimal impact on carriers and their subscribers.

1. Overlay the entire 616NPA with a new NPA as outlined in the Alternative # 4 of the Initial Planning Document. This will eliminate any mandatory number changes for subscribers of all services. Also, any required future NPA relief for the 616 NPA will only require notification to the public of an additional NPA.
2. Create a standard dialing plan to require 10 digit dialing for all local calls and 1 plus 10 digit dialing for any toll call. This plan creates a simple and easily understood dialing plan that optionally allows callers to clearly identify whether a call is a chargeable toll call.

Notice

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EXHIBIT E

Initial Planning Document
For Relief of the Michigan 616 NPA

Prepared by:

Sandy Tokarek,
Senior NPA Relief Planner

Linda Hymans,
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North American Numbering Plan Administration

Ronald R. Conners, Director
James N. Deak, Regional Director – NPA Relief Planning

January 19, 2000

616 NPA Relief Alternatives

Geographic Split Alternatives

All split plans require dialing of the area code for local dialing between NPAs in the same local calling area. Within an NPA, seven-digit local dialing would be maintained.

Alternative #1 – Two-Way Split

A north/south split bisecting the existing 616 NPA. One area will keep the 616 NPA and one area will receive a new NPA.

Area A **338 NXX Codes** **59 Rate Centers** **Projected Life: 4 years**
Grand Rapids Allegan Holland Greenville

Area B **216 NXX Codes** **53 Rate Centers** **Projected Life: 10 years**
Kalamazoo Battle Creek Benton Harbor Three Rivers

Alternative #2 – Two-Way Split

A north/south split modifying Alternative #1 by reducing the number of rate centers in Area A. One area will keep the 616 NPA and one area will receive a new NPA.

Area A **295 NXX Codes** **36 Rate Centers** **Projected Life: 5.5 years**
Grand Rapids Holland Grand Haven Greenville

Area B **259 NXX Codes** **76 Rate Centers** **Projected Life: 7.3 years**
Allegan Kalamazoo Battle Creek Benton Harbor Three Rivers

Alternative #3 – Two-Way Split

A Grand Rapids metro area two-way split. One area will keep the 616 NPA and one area will receive a new NPA.

Area A **273 NXX Codes** **37 Rate Centers** **Projected Life: 6.5 years**
Grand Rapids Holland Grand Haven Allegan

Area B **281 NXX Codes** **75 Rate Centers** **Projected Life: 6.2 years**
Kalamazoo Battle Creek Benton Harbor Three Rivers Greenville

Overlay Alternatives

Alternative #4 - All-Services Distributed Overlay

A new NPA code would be assigned to the same area covered by the current 616 NPA. Customers would keep their current telephone numbers; however, dialing of the area code would be required for all local calls. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 616 NPA all code assignments will be in the overlay area code.

554 NXX Codes 112 Rate Centers Projected Life: 6.3 years

Alternative #5 - Concentrated Growth Overlay

A overlay NPA code would be assigned to the Grand Rapids rate center - Area A. Customers in the Grand Rapids rate center would keep their current telephone numbers; however, dialing of the area code would be required for all local calls. Codes in the remaining rate centers - Area B will keep the 616 NPA and retain 7-digit local dialing until remaining NXX codes are utilized, at which time the overlay NPA will be extended to cover the entire geographic area.

Area A 152 NXX Codes 1 Rate Center Projected Life: 6.3 years
Grand Rapids

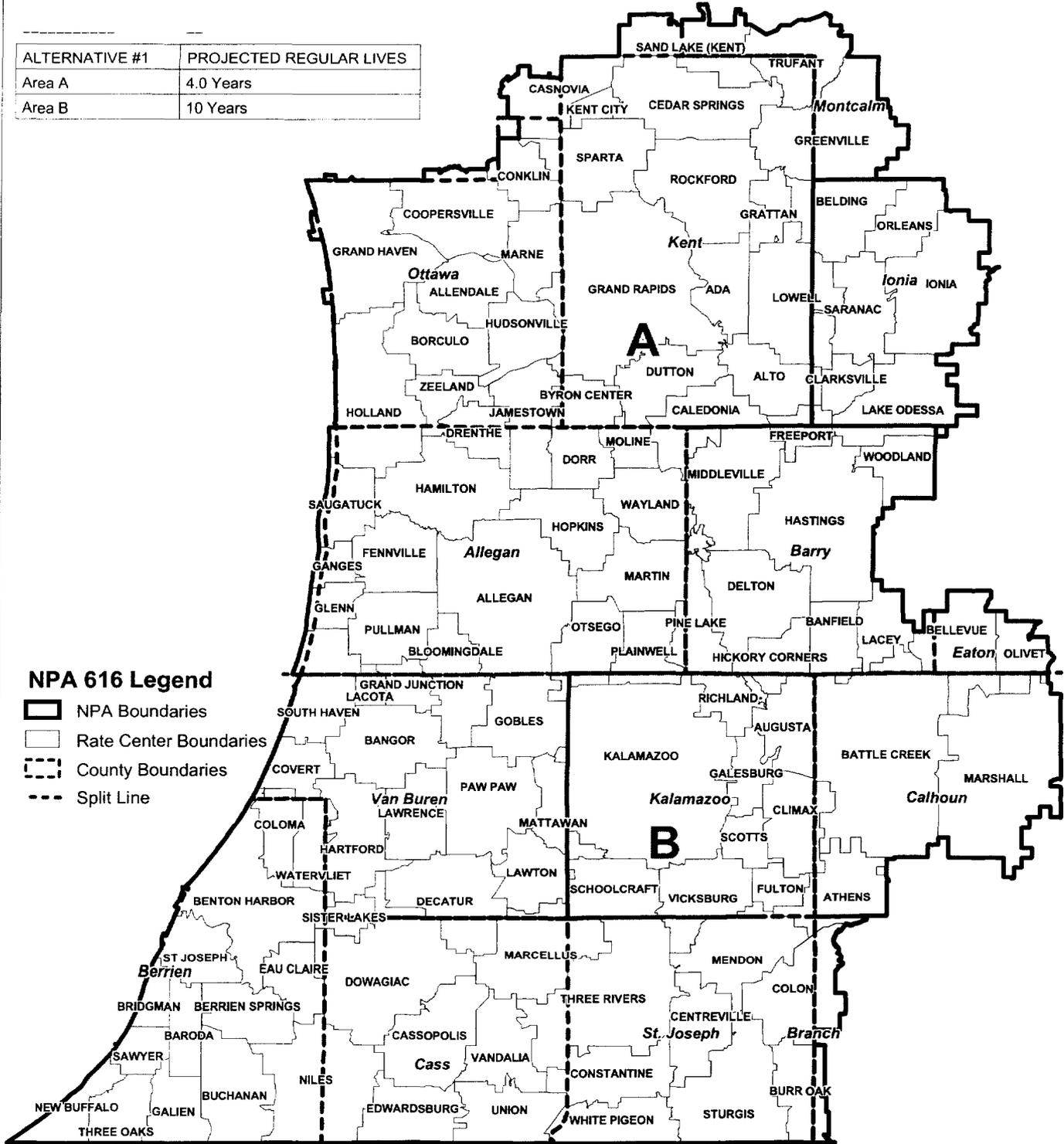
Area B 402 NXX Codes 111 Rate Centers Projected Life: 1 year
Kalamazoo Battle Creek Benton Harbor Holland Greenville

NPA 616 Rate Center and County Map



ALTERNATIVE #1
Two-Way Split

ALTERNATIVE #1	PROJECTED REGULAR LIVES
Area A	4.0 Years
Area B	10 Years



NPA 616 Legend

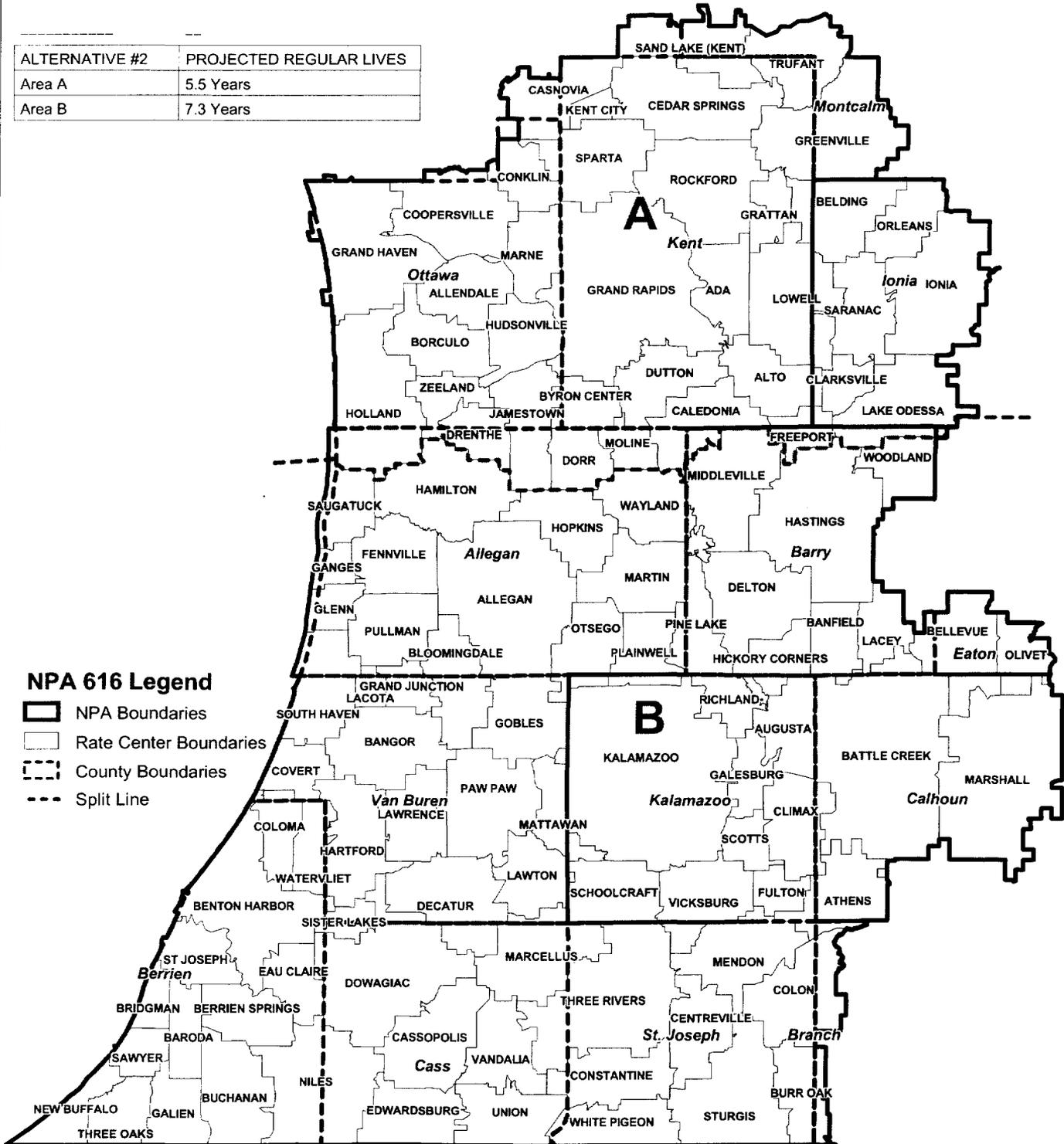
- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

NPA 616 Rate Center and County Map



ALTERNATIVE #2
Two-Way Split

ALTERNATIVE #2	PROJECTED REGULAR LIVES
Area A	5.5 Years
Area B	7.3 Years



NPA 616 Legend

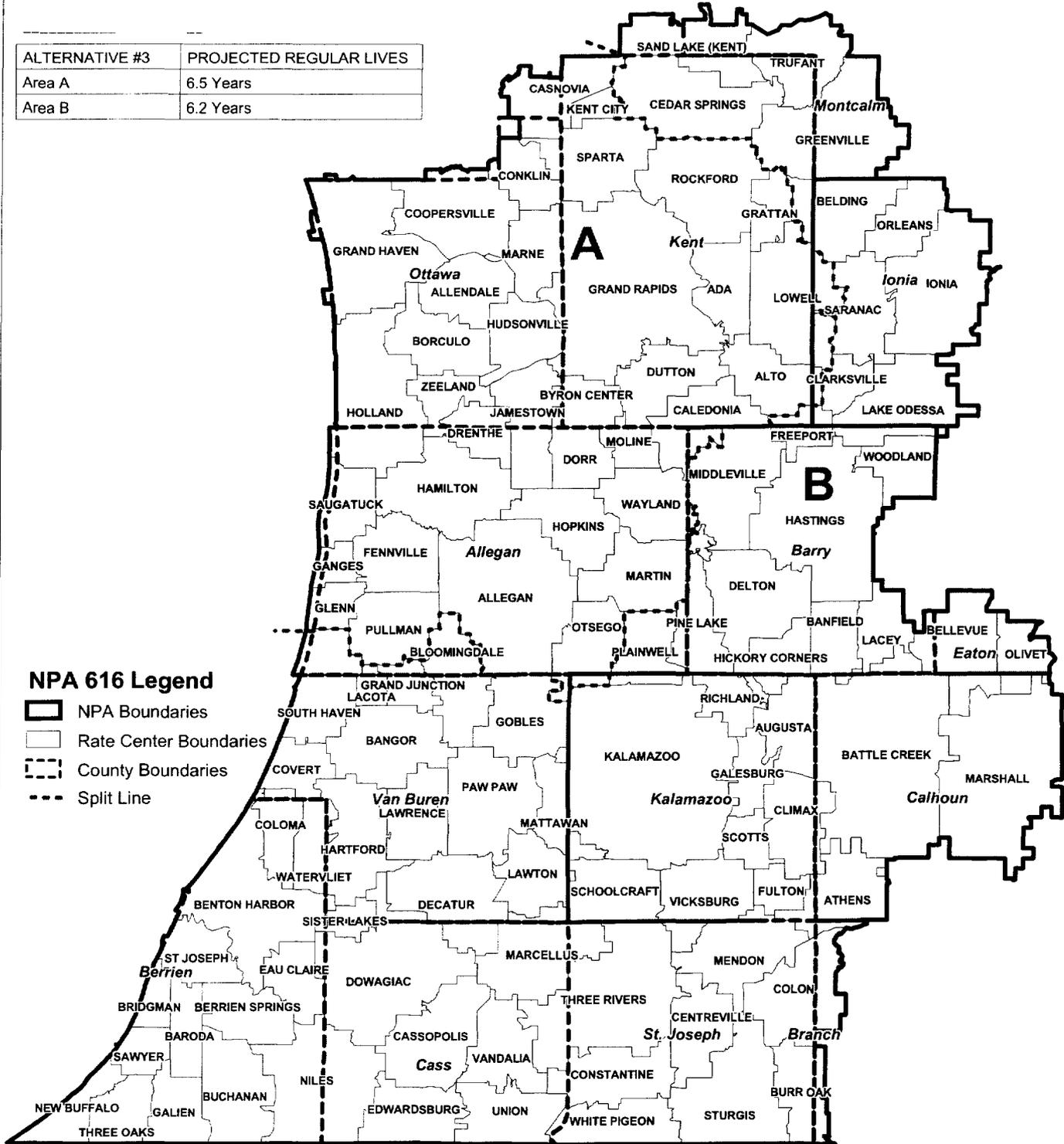
- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

NPA 616 Rate Center and County Map



ALTERNATIVE #3
Two-Way Split

ALTERNATIVE #3	PROJECTED REGULAR LIVES
Area A	6.5 Years
Area B	6.2 Years



NPA 616 Legend

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

NPA 616 Rate Center and County Map



Alternative # 5 Concentrated Growth Overlay

ALTERNATIVE #5	PROJECTED REGULAR LIVES
Area A	6.3 YEARS
Area B	1.0 YEAR

- NPA Boundaries
- Rate Center Boundaries
- County Boundaries
- Split Line

