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State of North Carolina
Utilities Commission

PO Box 29510
Raleigh, NC 27626-0510

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June 5, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Portals
445 Twelfth Street, S.W.
Washington, DC 20554

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JUN 8 2000

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Re: North Carolina Utilities Commission's Petition for Additional Delegated Authority to Implement Number Optimization Measures, NSD File No. L-99-97, CC Docket No. 96-98

Dear Ms. Salas:

By letter dated April 27, 2000, the petition referenced above was supplemented, as required in the Federal Communications Commission's Order in CC Docket No. 99-200 adopted on March 17, 2000 and released on March 31, 2000.

In paragraph 170 of the referenced Order, the FCC required that pending state commission petitions for additional delegated authority in numbering, and particularly for thousands-block number pooling, be supplemented to demonstrate that: (1) an NPA in the state is in jeopardy; (2) the NPA in question has a remaining life span of at least a year; and (3) the NPA is in one of the largest 100 MSAs, or, alternatively, that the majority of wireline carriers in the NPA are LNP-capable.

The North Carolina Utilities Commission's petition was supplemented with the information on two North Carolina area codes. Area code 704, which includes Charlotte, North Carolina and the surrounding area, is currently in jeopardy. An overlay has been adopted as the preferred method of relief. Another area code, 919, which includes the Raleigh/Durham/Chapel Hill Triangle area and the Research Triangle Park, is not in jeopardy according to the industry definition. However, exhaust of the code is projected and the industry has recommended an overlay method of relief. The Commission has taken no action on that recommendation at this time.

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The supplement also included information regarding when those area codes were projected to exhaust. The 1999 Central Office Code Utilization Survey (COCUS) conducted by the North American Numbering Plan Administrator (NANPA) indicated that area code 704 would exhaust in the fourth quarter of 2000. However, an update conducted in January 2000 indicated that, considering the rationing plan agreed to by the industry when the code went into jeopardy, and the return of some NXX codes, the 704 area code could potentially last until the third quarter of 2001. The 1999 COCUS also indicated that the 919 area code would exhaust in the second quarter of 2002, and that projection was not changed in the January 2000 update.

Since the supplemental filing, there have been a couple of developments. Therefore, the purpose of this letter is to update our supplemental filing. First, the 2000 Central Office Code Utilization Study (COCUS) results have been released. They indicate that, when the overlay, area code 908, is implemented to relieve area code 704, the two area codes should not exhaust until the second quarter of 2008. The COCUS results, therefore, do not clearly state the projected life of area code 704, in the absence of relief. Area code 919 is still not in jeopardy according to the industry definition, but exhaust is now projected for the fourth quarter of 2001. In another North Carolina area code, 336, projected exhaust has moved up from the first quarter of 2003 to the fourth quarter of 2002.

The moving up of the projected exhaust of area code 336 brings me to my second development. The North Carolina Utilities Commission has been informed by the North American Numbering Plan Administrator (NANPA) that it is necessary to start planning for relief of area code 336 and that it has scheduled an industry meeting discussing such relief for July 27, 2000. Area code 336 is not yet "in jeopardy" according to the industry definition. Relief is being planned, but the code has approximately two and one half years left according to the most recent COCUS. Area code 336 includes Greensboro, North Carolina, and the surrounding area, and, therefore, includes a top 100 MSA.

The Commission remains very interested in acquiring additional delegated authority to order thousands-block number pooling and believes that number pooling could potentially extend the lives of one or more North Carolina area codes.

If there are questions about the information provided herein, or if there is any additional information that I can provide, please do not hesitate to contact me at 919-715-9006. I am enclosing for filing an original and five copies of this letter. If you could file-

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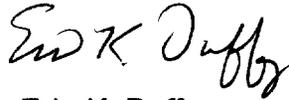
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stamp one copy of this letter and return it to me in the enclosed envelope for our internal records, it would be most appreciated. Thank you.

Very truly yours,



Erin K. Duffy
North Carolina Utilities Commission Staff

cc: Larry Strickling
Yog Varma
Jared Carlson
Charles Keller
Diane Harmon
Aaron Goldberger