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December 19, 2002

James W. McTarnaghan

HAND DELIVERED

President Loretta Lynch
Commissioner Henry Duque
Commissioner Carl Wood
Commissioner Geoffrey Brown
Commissioner Michael Peevey
California Public Utilities Division
505 Van Ness Avenue, Fifth Floor
San Francisco, CA 94102

Re: Numbering Relief in the 310 and 909 Area Codes

Dear Commissioners:

The Cellular Carriers Association of California (CCAC) respectfully urges the California Public Utilities Commission ("CPUC") to take immediate action to implement area code relief in the 310 and 909 Numbering Plan Areas ("NPAs" or "area codes"). Despite the CPUC's conservation efforts, recent reports from the NANC confirm that these two area codes have reached the end of their lives and will exhaust in the Second Quarter of 2003. Thus, in order to minimize the period of time that these codes will be in complete exhaust and that Californians will continue to suffer from the lack of numbering resources in their respective communities, CCAC asks the CPUC to immediately order the implementation of area code relief in these area codes.

Although number conservation has extended the functional lives of the 310 and the 909¹, the need for true – and immediate - area code relief in the 310 and 909 NPAs was emphatically underscored by the release of the NANC Status of Active Area Code Relief Projects on November 18, 2002 and the subsequent discussion of the California codes at the NANC meeting held in Washington, DC on November 19, 2002. This status report, attached to this letter as Exhibit B, reflects that the Forecasted NPA Exhaust date for the 310 and 909 NPAs in Southern California is Second Quarter 2003. The only two other area codes in similarly dire straits (the 616 NPA in Michigan and the 630 NPA in Illinois) both have approved relief plans in the

¹ The 310 and the 909 area codes have been the focus of a lengthy debate over California numbering policies for many years already. Nonetheless, as discussed below, no area code relief has been implemented for at least the last four years in either of those NPAs despite the fact that the need for such relief was inevitable. A more complete overview of the recent numbering history in the 310 and 909 is attached to this letter as Exhibit A.

process of being implemented. Thus, only Californians face a situation where area codes will exhaust without an area code relief plan in place.

As this Commission and the telecommunications industry are aware, the 909 and 310 area codes are scheduled to reach exhaust in the next 4 to 7 months. Thus, it does not appear that area code relief can be fully implemented in time to avoid exhaust although the members of CCAC are dedicated to working with the Commission to implement an appropriate plan as quickly as it can be done in a responsible manner.

CCAC submits that the CPUC should take immediate action to adopt and implement area code relief plans for these NPAs. CCAC does not believe that the Technology-Specific Overlay (“TSO”) proposal submitted by the CPUC to the Federal Communications Commission (“FCC”) on September 27, 2002 is feasible or appropriate to address the numbering shortages in 310 and 909. As detailed in comments filed by individual members of CCAC with the FCC, the TSO proposal discriminates against wireless consumers and carriers, is inconsistent with the FCC’s guidelines on TSOs, and provides only a short-term solution to a long-term problem. Moreover, since the CPUC cannot implement a TSO without FCC approval, a TSO is simply not a viable option in the limited time remaining.

Instead, CCAC requests that the Commission adopt and implement all services overlays in both the 310 and the 909 NPAs.² Without immediate relief, Californians (and carriers) will continue to suffer from the lack of numbering resources and the resulting lack of competition for the foreseeable future.³ Above all, CCAC urges the Commission to immediately implement area code relief so that consumers will not be denied the right to receive telecommunications services “from providers of their choice for a want of numbering resources.”⁴

² As CCAC has stated on numerous occasions, the all services overlay, now being used in over 40 major metropolitan areas across the United States, is the preferred approach to area code relief as it requires no existing customers to change their numbers and can generally be implemented with less lead time than other area code relief plans. Moreover, CCAC believes that the necessary network configurations for an all-services overlay are still in place in the 310 as a result of the 1998-1999 attempt to implement the overlay. An area code split is of course a viable, although less preferable (because among other things a split involves the take back of numbers/area code changes for customers), alternative method to address the current numbering situation in these NPAs.

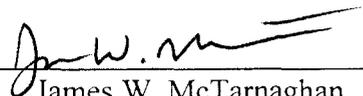
³ Customers and carriers have already had to bear the burden of numbering shortage in these NPAs. For example, due to the severe and extended number rationing in these NPAs, wireless carriers have at times been unable to get numbers in the rate centers (or in the NPAs) needed to meet customer demand. As a result, wireless customers have been forced to take numbers from distant rate centers or adjacent area codes. Among other things, this has resulted in discriminatory dialing patterns for wireless consumers and, in certain instances, increased charges to landline customers for the resulting additional toll calls. In certain situations, customers have actually been unable to freely select the carrier of their choice for the simple reason that the carrier could not obtain any numbering resources whatsoever.

⁴ FCC Delegated Authority Order at ¶ 9.

If you have any questions on the above, please contact me at 415-392-7900.

Very truly yours,

GOODIN, MACBRIDE,
SQUERI, RITCHIE & DAY, LLP

By 
James W. McTarnaghan

cc: Jack Leutza (w/ attachments)
Cherrie Conner (w/ attachments)
Helen Mickiewicz (w/ attachments)
Thomas Long (via email)
Fassil Fenikile (via email)
Jonathan Lakritz (via email)
Rob Wullenjohn (via email)
Lester Wong (via email)

EXHIBIT “A”

Exhibit A
Brief Overview of Numbering History in the 310 and 909 NPAs

1. The 310 NPA.

- 1997 – the 310 is declared by the code administrator to be in jeopardy; rationing is instituted at the rate of 5 codes per month.
- May 1998 - the CPUC approves an all services overlay for the 310 area code.¹ The CPUC determines that the all-services overlay would “provide the best overall remedy for 310 NPA relief when compared against either the two-way or three-way geographic splits offered as alternatives.” The CPUC further determines that the all services overlay met the prerequisites for competitive neutrality and would “best satisfy the remaining criteria for evaluation of relief plans . . . that focus on minimizing the adverse impacts on customers.”
- September 1999 - shortly before full implementation of the overlay, the CPUC reverses its position and suspends the overlay.²
- February 2000 – rationing is reduced to 2 codes every other month per letter from Telecommunications Director Jack Leutza dated January 28, 2000.
- April 2000 – unassigned codes no longer carried over to next month per letter from Telecommunications Director Jack Leutza dated April 10, 2000.
- July 2000 – the CPUC orders additional imminent exhaust criteria for growth codes and minimum fill rates.³
- September 2000 - the CPUC approves “a back-up contingency plan” that it determined would allow sufficient time for implementation of a two-way geographic split before all NXX codes in the 310 NPA had been exhausted.⁴ The Commission sets forth an eight-month implementation schedule that would be initiated upon the Commission’s determination that the underlying carrier utilization data was reliable and warranted the implementation of the plan. Accordingly, the Telecommunications Division is ordered to conduct an audit of the data contained in its Report on the 310 NPA.
- February 2002 - the Telecommunications Division Staff conducts an audit of numbering resources and issues a report in which it concludes that the carriers’ utilization data was reliable and that additional telephone numbers were “not sufficient to extend the life of the 310 area code” and the “backup plan for the 310 area code should be implemented as directed in Decision 00-09-073.”⁵
- September 2002 – the Commission submits its TSO Petition to the FCC.
- November 2002 – NANC Status of Active Area Code Relief Project Report projects total exhaust by second quarter 2003.

¹ See D.98-05-021.

² See D.99-09-067.

³ See D.00-07-052.

⁴ See D.00-09-073.

⁵ Audit Report on the 310 Area Code, February 16, 2002, available at http://www.cpuc.ca.gov/published/report/5281.htm#P661_49579.

Exhibit A
Brief Overview of Numbering History in the 310 and 909 NPAs

2. The 909 NPA

- 1998 – the 909 is declared by the code administrator to be in jeopardy; rationing is instituted at the rate of 7 codes per month.
- March 1999 - two-phase area code relief plan is adopted by the CPUC, with the first phase as a geographic split plan followed by the creation of an all services overlay.⁶
- December 1999 - shortly before the split would have been implemented, the CPUC suspends the overlay.⁷
- March 2000 – rationing is reduced to 2 codes per month unassigned codes and unassigned codes no longer carry over to next month per letter from Telecommunications Director Jack Leutza dated February 28, 2000.
- July 2000 – the CPUC orders additional imminent exhaust criteria for growth codes and minimum fill rates.⁸
- June 2001, ALJ orders the Telecommunication Division Staff to conduct an audit of the carrier utilization data for the 909 NPA much as it had for the 310 NPA.
- December 2001 – Telecommunications Division Staff issues report recommending, among other things, that a back-up plan should be created by the Commission within 6 months.⁹
- June 2002 - NANPA files a Petition for Relief in the 909 Area Code in which it recommends that either an all-services overlay or a geographic split be implemented in the 909 NPA.
- September 2002 – the Commission submits its TSO Petition to the FCC.
- November 2002 – NANC Status of Active Area Code Relief Project Report projects total exhaust by second quarter 2003.

2707/026/X39829-1

⁶ See D.99-03-059.

⁷ See D.99-12-051. In this Decision, the Commission also suspended all-services overlays that had been approved for the 408, 415, 510, 650 and 714 NPAs.

⁸ See D.00-07-052.

⁹ Audit Report on the 909 Area Code, December 21, 2001, available at <http://www.cpuc.ca.gov/published/report/12040.htm>.

EXHIBIT “B”

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	203	205	206	208	209	217	240/301	253	252
Location	CT	AL	WA	ID	CA	IL	MD	WA	WI
Forecasted NPA Exhaust	3Q2004	3Q2007	1Q2008	4Q2009	4Q2012*	2Q2004	4Q2007	3Q2014	3Q2008
Relief Planning Process									
Initial Mtg. Notice Distributed	NA	2/24/00	11/23/99	8/16/00	10/7/99	6/15/01	2/17/00	11/29/99	3/29/01
Industry Specified Filing Date	NA	5/25/00	2/15/00	11/9/00	8/28/00	10/19/01	5/12/00	2/15/00	TBD
Actual Filing Date with PSC	NA	5/25/00	2/15/00	11/9/00	8/28/00	10/18/01	5/12/00	2/15/00	
Requested Implementation Date	NA	1/8/02	3/16/02	8/12/02	S 12/14/02 O 9/21/02	None Note #2	None	3/16/02	
Requested Relief Type	NA	Overlay	Overlay	Overlay	Overlay & 2 Splits	Overlay	Overlay	Overlay	
Requested PSC Approval	NA	9/1/00	None	None	None	None	None	None	
Relief Implementation Process									
PSC Approval Received	9/29/99	4/2/01	5/10/00	12/5/01			1/3/01	10/13/99	
Approved Relief Type	Overlay	Overlay	Overlay	3W Split			Overlay	Overlay	
Approved Implementation Date	TBD	Rescinded	Suspended	Note #5			TBD	Suspended	
Implementation Meeting	11/19/99	4/27/01	7/10/00				2/22/01 11/7/01	7/10/00	

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	267/215	270	304	310	312	313	314	315	317	321/407
Location	PA	KY	WV	CA	IL	MI	MO	NY	IN	FL
Forecasted NPA Exhaust	1Q2005	4Q2004	1Q2004	2Q2003*	3Q2005	2Q2007	1Q2008	4Q2006	4Q2006	2Q2007
Relief Planning Process										
Initial Mtg. Notice Distributed	10/4/99	2/6/01	3/16/00	NA	9/10/98	6/2/99	9/28/99	9/23/99	11/27/00	1/31/01
Industry Specified Filing Date	1/20/00	7/25/01	6/21/00	NA	11/18/98	NA	12/17/99	12/23/99	2/12/01	5/15/01
Actual Filing Date with PSC	1/20/00	7/25/01	6/21/00	NA	11/18/98	NA	12/17/99	12/23/99	2/12/01	5/15/01
Requested Implementation Date	4/3/00	None	None	NA	None	NA	2/3/01	None	None	None
Requested Relief Type	Overlay	Overlay	Overlay or Split	NA	Overlay	NA	Overlay	Overlay	Overlay	Overlay
Requested PSC Approval	None	None	11/15/00	NA	2/1/99	NA	3/1/00	3Q00	7/1/01	None
Relief Implementation Process										
PSC Approval Received	NA			9/25/00	7/1/99	9/12/01	10/24/00			3/25/02
Approved Relief Type	Overlay			Split	Overlay	Overlay	Overlay			Overlay
Approved Implementation Date	TBD			TBD	TBD	TBD	Suspended			Suspended
Implementation Meeting	5/18/00			11/2/00	9/21/99	TBD	11/10/00			4/23/02

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	323	334	336	360	402	405	408	414	415	425
Location	CA	AL	NC	WA	NE	OK	CA	WI	CA	WA
Forecasted NPA Exhaust	2Q2010*	2Q2009	2Q2006	3Q2004	1Q2005	1Q2008	1Q2008*	3Q2015	1Q2008*	3Q2012
Relief Planning Process										
Initial Mtg. Notice Distributed	5/10/99	2/24/00	6/7/00	3/5/99	6/28/99	4/5/00	NA	6/21/01	NA	11/23/99
Industry Specified Filing Date	1/31/00	5/25/00	9/7/00	9/22/99	9/15/99	12/25/00	8/20/98	TBD	12/18/98	2/15/00
Actual Filing Date with PSC	1/31/00	5/25/00	9/7/00	9/22/99	9/15/99	10/25/00	8/20/98		12/18/98	2/15/00
Requested Implementation Date	S 7/27/02 O 10/20/01	1/8/02	None	None	None	3/23/02	S 8/12/00 O 5/19/01		NA	3/16/02
Requested Relief Type	Overlay & 4 Splits	Split	Overlay	Overlay	Split	Overlay	Overlay or Split		NA	Overlay
Requested PSC Approval	None	9/1/00	9/1/01	None	None	None	None		NA	None
Relief Implementation Process										
PSC Approval Received		10/2/00		10/13/99			11/20/98		4/1/99	5/10/00
Approved Relief Type		Split		Overlay			Overlay		Overlay	Overlay
Approved Implementation Date		Wireline 1/7/02 Wireless 2/12/03		Suspended			Suspended		Suspended	Suspended
Implementation Meeting		10/30/00		10/14/99 7/10/00			1/4/99		4/28/99	7/10/00

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	440	443/410	469/214/972	484/610	505	510	512	513	516	518
Location	OH	MD	TX	PA	NM	CA	TX	OH	NY	NY
Forecasted NPA Exhaust	2Q2007	2Q2004	4Q2007	1Q2004	2Q2006	1Q2009*	3Q2006	3Q2008	1Q2011	4Q2008
Relief Planning Process										
Initial Mtg. Notice Distributed	NA	2/17/00	2/10/00	10/4/99	1/18/00	NA	12/15/99	NA	11/2/99	7/1/99
Industry Specified Filing Date		5/12/00	4/28/00	1/20/00	4/12/00	12/30/98	3/1/00	NA	2/15/00	9/23/99
Actual Filing Date with PSC	NA	5/12/00	4/28/00	1/20/00	4/12/00	12/30/98	3/1/00	NA	2/15/00	9/22/99
Requested Implementation Date	NA	None	None	4/3/00	3/1/02	S 4/21/01 O 3/17/01	2/24/01	NA	None	None
Requested Relief Type	NA	Overlay	Overlay	Overlay	2W Split	Overlay or Split	Overlay	NA	Overlay	Overlay
Requested PSC Approval	NA	None	None	None	4/1/01	None	None	NA	None	None
Relief Implementation Process										
PSC Approval Received		1/3/01		NA	7/10/01	4/1/99	4/19/00	10/28/00		
Approved Relief Type		Overlay		Overlay	Split	Overlay	Overlay	Overlay		
Approved Implementation Date		TBD		TBD	Suspended	Suspended	Suspended	Suspended		
Implementation Meeting		2/22/01		5/18/00	7/26/01	4/28/99	5/15/00	3/13/01		

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	530	540	541	559	562	570	601	603	609	614
Location	CA	VA	OR	CA	CA	PA	MS	NH	NJ	OH
Forecasted NPA Exhaust	2Q2011*	3Q2006	4Q2005	3Q2013*	1Q2015	3Q2006	2Q2004*	3Q2004	3Q2006	1Q2005
Relief Planning Process										
Initial Mtg. Notice Distributed	5/27/99	8/12/99	2/18/00	10/5/99	12/30/98	4/20/00	10/17/00	10/12/98	5/18/00	NA
Industry Specified Filing Date	4/26/00	11/3/99	6/5/00	8/21/00	6/15/99	7/20/00	1/18/01	2/18/99	8/10/00	NA
Actual Filing Date with PSC	4/26/00	11/3/99	6/5/00	8/21/00	6/15/99	7/20/00	1/18/01	2/18/99	8/10/00	NA
Requested Implementation Date	None	None	10/26/02	S 12/14/02 O 9/21/02	S 8/11/01 O 1/13/01	None	None	NA	None	NA
Requested Relief Type	Overlay or Split	Split	Overlay	Overlay & Split	Overlay or Split	Overlay	Overlay	NA	Overlay	NA
Requested PSC Approval	None	1Q2000	None	None	None	None	None	6/1/99	9/1/02	NA
Relief Implementation Process										
PSC Approval Received		2/22/01								5/17/01
Approved Relief Type		3W Split								Overlay
Approved Implementation Date		Wireline 3/16/02 Wireless 2/22/03								Suspended
Implementation Meeting		4/10/01								7/25/01

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	615	616	618	619	626	630	631	650	662
Location	TN	MI	IL	CA	CA	IL	NY	CA	MS
Forecasted NPA Exhaust	1Q2007	2Q2003*	2Q2004	3Q2013*	2Q2014*	2Q2003	1Q2007	3Q2011*	4Q2005
Relief Planning Process									
Initial Mtg. Notice Distributed	6/15/99	1/5/00	7/26/00	NA	6/30/99	9/10/98	10/19/00	NA	6/5/01
Industry Specified Filing Date	8/31/99	3/17/00	10/18/00	NA	7/12/00	11/18/98	1/25/01	1/22/99	10/1/01
Actual Filing Date with PSC	8/31/99	3/17/00	10/18/00	NA	7/12/00	11/18/98	1/25/01	1/22/99	9/28/01
Requested Implementation Date	None	8/25/01	None	NA	3/23/02 O, 3W 9/13/03, 2W 9/14/02	NA	None	6/16/01	None Note #3
Requested Relief Type	Overlay	Overlay	Overlay	NA	Overlay & 2 Splits	NA	Overlay	Overlay	Overlay
Requested PSC Approval	None	None	None	NA	None	2/1/99	None	None	None
Relief Implementation Process									
PSC Approval Received		6/5/01		6/4/98		7/1/99		4/22/99	
Approved Relief Type		Split		3W Split		Overlay		Overlay	
Approved Implementation Date		2/15/03		Suspended		TBD		Suspended	
Implementation Meeting		7/17/01				9/21/99		5/12/99	

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	678/770	706	707	708	714	715	716	717	734
Location	GA	GA	CA	IL	CA	WI	NY	PA	MI
Forecasted NPA Exhaust	2Q2015	2Q2005	1Q2009*	4Q2007	1Q2006*	2Q2005	2Q2011	4Q2006	1Q2008
Relief Planning Process									
Initial Mtg. Notice Distributed	12/3/98	8/7/00	12/24/98	9/10/98	NA	4/9/02	4/23/98	2/20/01	6/2/99
Industry Specified Filing Date	2/19/99	11/9/00	7/30/99	11/18/98	11/30/98	8/12/02	7/21/98	5/30/01	
Actual Filing Date with PSC	2/19/99	11/9/00	7/30/99	11/18/98	11/30/98	8/12/02	7/21/98	5/30/01	NA
Requested Implementation Date	None	None	S 9/8/01 O 7/13/02 3W 9/8/01 7/13/02	None	S 2//10/01 O 1/6/01	None Note #7	None	None	None
Requested Relief Type	Overlay	Overlay	Split w/ Overlay or 3W Split	Overlay	Overlay or Split	Overlay	Overlay, Split or 2W Split	Overlay	Overlay
Requested PSC Approval	9/14/99	None	None	2/1/99	None	None	None	8/23/01	None
Relief Implementation Process									
PSC Approval Received	2/6/01		12/16/99	7/1/99	3/18/99		5/22/00		9/12/01
Approved Relief Type	Overlay		3WSplit	Overlay	Overlay		Split		Overlay
Approved Implementation Date	TBD		Suspended	TBD	Suspended		Wireline 8/17/2002 Wireless 11/15/04		TBD
Implementation Meeting	3/8/01		1/26/00	9/21/99	4/20/99		3/30/01		TBD

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	760	765	773	801	803	804	805	810	812	814
Location	CA	IN	IL	UT	SC	VA	CA	MI	IN	PA
Forecasted NPA Exhaust	4Q2006*	3Q2004	4Q2005	3Q2005	1Q2009	2Q2009	1Q2009*	1Q2012	4Q2004	1Q2006
Relief Planning Process										
Initial Mtg. Notice Distributed	7/6/98	8/10/01	9/10/98	8/12/99	10/12/00	3/23/99	6/30/99	3/17/99	10/12/01	1/23/02
Industry Specified Filing Date	3/16/99	11/9/01	11/18/98	11/4/99	2/23/01	6/9/00	7/17/00		2/1/02	TBD
Actual Filing Date with PSC	3/16/99	11/9/01	11/18/98	11/4/99	2/23/01	6/9/00	7/17/00	NA	2/1/02	
Requested Implementation Date	7/21/01	None Note #4	8/28/99	11/18/00	None	10/1/99	S 8/24/02 O 2/23/02	None	None Note #4	
Requested Relief Type	Split	Overlay	Overlay	Overlay	Overlay	Overlay	Overlay or Split	Overlay	Overlay	
Requested PSC Approval	None	None	2/1/99	None	6/1/01	None	None	None	None	
Relief Implementation Process										
PSC Approval Received	7/8/99		7/1/99	4/26/00		12/7/00		12/11/00		
Approved Relief Type	Split		Overlay	Split		Split/Over.		Split		
Approved Implementation Date	Suspended		TBD	9/30/05		Split:Wireline 1/15/02 Split:Wireless 6/1/03 Overlay:TBD		Wireline 3/23/02 Wireless 3/22/03		
Implementation Meeting	8/12/99		9/21/99	5/18/00		1/4/01		1/24/01		

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	815	816	818	832/713/281	843	856	860	903	908	909
Location	IL	MO	CA	TX	SC	NJ	CT	TX	NJ	CA
Forecasted NPA Exhaust	2Q2004*	1Q2008	2Q2007*	1Q2005	1Q2008	2Q2007	1Q2004	4Q2018	4Q2005	2Q2003*
Relief Planning Process										
Initial Mtg. Notice Distributed	3/22/00	9/28/99	6/1/98	12/15/99	10/3/00	5/18/00	NA	8/2/00	11/2/98	3/3/98
Industry Specified Filing Date	6/29/00	12/17/99	2/12/99	3/7/00	2/23/01	8/10/00	NA	10/25/00	1/27/99	6/13/98
Actual Filing Date with PSC	6/29/00	12/17/99	2/12/99	3/7/00	2/23/01	8/10/00	NA	10/25/00	1/27/99	12/7/98
Requested Implementation Date	None	12/2/00	None	None	None	None	NA	6/8/02	None	Note #6
Requested Relief Type	Overlay	Overlay	Overlay or Split	Overlay	Overlay	Overlay	NA	Overlay	Overlay	Split or Overlay Note #6
Requested PSC Approval	None	3/1/00	None	None	6/1/01	9/1/02	NA	None	None	NA
Relief Implementation Process										
PSC Approval Received		10/24/00	10/7/99				9/29/99	12/17/01		3/19/99
Approved Relief Type		Overlay	Split				Overlay	Overlay		Split/Over.
Approved Implementation Date		Suspended	TBD				TBD	2/15/03		Suspended
Implementation Meeting		11/30/00	NA				11/19/99	1/16/02		4/20/99

STATUS OF ACTIVE AREA CODE RELIEF PROJECTS

NPA	915	916	918	919/984	920	925	941	949
Location	TX	CA	OK	NC	WI	CA	FL	CA
Forecasted NPA Exhaust	3Q2005	1Q2011*	1Q2005	2Q2032	1Q2005	3Q2013*	2Q2011	3Q2016*
Relief Planning Process								
Initial Mtg. Notice Distributed	6/6/01	12/24/98	4/5/00	9/9/99	8/18/99	12/24/98	5/18/00	7/1/99
Industry Specified Filing Date	9/10/01	7/30/99	10/27/00	12/10/99	TBD	7/30/99	9/19/00	7/27/00
Actual Filing Date with PSC	9/10/01	7/30/99	10/27/00	12/10/99		7/30/99	9/19/00	7/27/00
Requested Implementation Date	None Note #2	S 11/3/01 O 11/18/00	4/20/02	8/1/02		S 10/20/01 O 12/16/00	None	S 11/9/02 O 4/13/02
Requested Relief Type	Overlay	Overlay or Split	Overlay	Overlay		Overlay or Split	Overlay	Overlay & Split
Requested PSC Approval	None	NA	None	None		None	5/31/01	None
Relief Implementation Process								
PSC Approval Received	3/1/02			3/13/01			9/6/01	
Approved Relief Type	3W Split			Overlay			Split	
Approved Implementation Date	10/4/03			Postponed			3/10/03	
Implementation Meeting	4/3/02			4/5/01			10/11/01	

*** NPA Exhaust based upon rationing**

Exhaust dates reflect June 2002 NRUF analysis results, plus updated forecasts, if applicable.

NPAs with heavy border have one year or less until forecasted exhaust

Note #2: The industry recommended a 19-month implementation interval.

Note #3: The industry recommended a 22-month implementation interval.

Note #4: The industry recommended a 16-month implementation interval.

Note #5: NANPA denied relief codes request.

Note #6: Upon request by the CPUC to refresh the record, NANPA filed a petition on 6/14/02 in which the CA industry recommended the CPUC approve either a split or an overlay for relief of the 909 NPA. In the petition, the industry recommended a 14-month implementation interval if a split is approved and 10 months if an overlay is approved.

Note #7: The industry recommended a 19-month implementation interval for the overlay.