February 16, 2000

By Overnight Courier

Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-99-1535; Relief Plan for the 206, 425, and 253 Area Codes

Dear Ms. Washburn:

The North American Numbering Plan Administrator NeuStar, Inc. (formerly Lockheed Martin IMS)[1] ("NANPA"), in its role as the neutral third party NPA Relief Planner for Washington under the North American Numbering Plan and acting on behalf of the Washington telecommunications industry ("Industry"),[2] requests the Washington Utilities & Transportation Commission ("Commission") approve

[1] The North American Numbering Plan administration and other numbering functions have been transferred from Lockheed Martin IMS to NeuStar, Inc. The Federal Communications Commission 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.

[2] The Industry is comprised of current and prospective telecommunications carriers operating in or considering operations within the state of Washington.

the Industry's consensus decision to implement a single all services distributed overlay relief plan for the 206, 425 and 253 Numbering Plan Areas

("NPA").[3] The Industry recommends that the customer notification period begin on June 16, 2001[4] and mandatory ten-digit dialing begin on March 16, 2002.

I. BACKGROUND

The 1999 Central Office Code Utilization Survey ("COCUS") projections for CO code utilization indicate that the 206 and 425 NPAs will exhaust during the second quarter of 2002 and the fourth quarter of 2003, respectively.[5] To allow sufficient time to prepare for NPA relief to avoid number exhaust, NANPA notified the Commission and the Industry members on November 22, 1999 of the need to address NPA relief planning.[6] Subsequently, on November 29, 1999, NANPA notified the Industry and the Commission that the 253 is projected to exhaust in the second quarter of 2006 and discussions of relief for the 206 and 423 NPAs may involve the 253 NPA.

The Industry met on January 5, 2000 in Bellevue, Washington to discuss relief alternatives.[7] Pursuant to the NPA Relief Planning Guidelines, NANPA presented an Initial

[3] As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

[4] Permissive ten-digit dialing already has been implemented in the entire area served by these three area codes.

[5] On January 18, 2000, NANPA released an update of the 1999 COCUS which revises the projected exhaust dates for the 425 and the 253 NPAs. The January 18, 2000 updated COCUS projections indicate that the 425 and the 253 NPAs will exhaust during the third quarter of 2002 and the first quarter of 2004, respectively.

[6] In order to plan for the introduction of new area codes, NANPA and the Industry utilized the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Aug. 30, 1999) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Guidelines can be accessed on the Alliance for Telecommunications Industry Solutions ("ATIS") web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

[7] A copy of the meeting minutes, including a list of attendees, is attached as Tab 4.

Planning Document ("IPD"),[8] which contained descriptions, maps, dialing requirements and the projected lives of each relief alternative. At the January 5 meeting, NANPA presented four relief alternatives: an all services distributed overlay over the 206 NPA; an all services distributed overlay over the 425 NPA; and three different versions of a geographic split of the 425 NPA. At the request of Commission staff, NANPA presented information regarding five variations of a combined overlay relief alternative: 1) a single all services overlay for each of the 206 and 425 NPAs; 2) a single all services distributed overlay over both of the 206 and 425 NPAs; 3) a single all services distributed overlay over the 206, 425 and 253 NPAs; 4) a single all services distributed overlay over the 206, 425, 253 and 360 NPAs using the NPA assigned to overlay the 360 NPA; 5) and a single all services distributed overlay for the entire state – encompassing the 206, 425, 253, 360 and 509 NPAs. After extended discussion, the Industry reached consensus to recommend to the Commission the single all services distributed overlay over the 206, 425 and 253 NPAs.

II. DESCRIPTION OF THE ALL SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

The all services distributed overlay relief plan would overlay a new area code on the same geographic area covered by the existing 206, 425 and 253 NPAs. All existing customers would retain their existing 206, 425 and 253 area codes and they would not be required to change their telephone numbers. Consistent with current Federal Communications Commission ("FCC") regulations, the Industry reached consensus to recommend the implementation of a ten-digit local dialing plan both within and between the existing NPAs and the overlay NPA.[9] When one or more of the 206, 425 or

[8] The Initial Planning Document is attached as Tab 5.

[9] 47 C.F.R. §52.19(c)(3)(ii).

253 NPAs exhausts its supply of CO codes, all CO code assignments for the exhausted NPA will be made from the new overlay NPA. The Industry recommends that the customer notification period begin on June 16, 2001 and mandatory ten-digit dialing begin on March 16, 2002. Activation of the first CO code in the new NPA will occur approximately sixty days after the beginning of mandatory dialing. Adhering to the adopted implementation schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests that the Commission approve, on an expedited basis, the Industry's recommended single all services distributed overlay as the means of relief for the 206, 425 and 253 NPAs.

Respectfully submitted,

Bruce Armstrong
NPA Relief Planner
North American Numbering Plan Administrator
NeuStar, Inc.
1120 Vermont Avenue, N.W., Suite 550
Washington, D.C. 20005
(303) 774-8915

BEFORE THE WASHINGTON UTILITIES AND TRANPORTATION COMMISSION

*** * * * ***

206 / 425 / 253 NPA EXHAUST RELIEF PLAN

Bruce H. Armstrong
NPA Relief Planner – Western Region
Neustar NANPA

Neustar
North American Numbering Plan Administration
1120 Vermont Ave, NW
Washington, DC 20005
Telephone: (202) 756-5783
Facsimile: (202) 887-0331

February 16, 2000

206, 425, 253 NPA EXHAUST RELIEF PLAN

TABLE OF CONTENTS

TAB 1

EXECUTIVE SUMMARY

This document describes the planning background, industry process, relief alternatives and implementation schedule related to relief planning for the exhaust of the 206, 425 and 253 Numbering Plan Areas (NPA) or area codes. New area codes are required to relieve the 206 and 425 area codes within about two years and the 253 area code within about four years. The 206, 425 and 253 area codes are currently projected to exhaust in the second quarter of 2002 (2Q2002); third quarter of 2002 (3Q2002); and first quarter 2004 (4Q2004), respectively.[1]

The planning meeting was initially announced on November 22, 1999, to include the 206 and 425 area codes only. A supplemental planning meeting announcement was issued on November 29, 1999, to include the 253 area code in discussions.

NeuStar NANPA, in its role as Area Code Relief Coordinator, convened an industry meeting attended by members of the telecommunications industry planning team to develop and consider various relief alternatives for the 206 and 425 area codes, with the possibility of including the 253 area code. This team is composed of current and prospective central office code holders, incumbent local exchange carriers, interexchange carriers, wireless carriers and competitive local exchange carriers as well as members of the Washington Utilities and Transportation Commission Staff.

Currently, there are 41 central office code holders in the 206 area code; 35 central office code holders in the 425 area code; and 30 central office code holders in the 253 area code.

Code Holder	206	425	253
ADVANCED TELCOM GROUP, INC. – WA	**X**		**X**
ADVANCED TELECOMM INC DBA CADY TELEMENAGEMENT INC	**X**		
AIRTOUCH PAGING - WASHINGTON	**X**		
ALLEGIANCE TELECOM OF WASHINGTON, INC.	**X**	**X**	
AT&T LOCAL	**X**	**X**	**X**
AT&T WIRELESS SERVICES, INC.	**X**	**X**	**X**
CCCWA INC. DBA CONNECT – WA	**X**		
CENTURYTEL OF WASHINGTON, INC.	**X**	**X**	**X**
ELECTRIC LIGHTWAVE, INC. – WASHINGTON	**X**	**X**	**X**
FOCAL COMMUNICATIONS CORPORATION OF WASHINGTON	**X**	**X**	**X**
FOX COMMUNICATIONS CORPORATION	**X**	**X**	**X**
FRONTIER LOCAL SERVICES, INC. – WA	**X**	**X**	**X**
GOLD TEL CORPORATION	**X**	**X**	**X**
GREAT WEST SERVICES, LTD. - WA	**X**	**X**	

[1] These exhaust dates correspond to the latest forecast produced by NANPA but not yet published. The new forecast will have been published by the time of this filing. The newer forecast predictions are being used throughout this document because those are the predictions relied upon more by industry in making their decisions.

Code Holder	206	425	253
GST LIGHTWAVE, INC. – WASHINGTON	**X**	**X**	**X**
GTE MOBILNET OF THE SOUTHEAST – GEORGIA	**X**	**X**	**X**
GTE NORTHWEST INCORPORATED – WA	**X**	**X**	**X**
GTE NORTHWEST, INC. – WASHINGTON	**X**	**X**	
ICG TELECOM GROUP – WA	**X**		
INTERNATIONAL TELCOM, LTD. – WA	**X**	**X**	**X**
LEVEL 3 COMMUNICATIONS, LLC – WA	**X**	**X**	
MARATHON COMMUNICATIONS, INC	**X**		
MCIMETRO, ATS, INC.	**X**	**X**	**X**
METROCALL	**X**		**X**
MOBILEMEDIA COMMNICATIONS, INC. - CALIFORNIA		**X**	
NEXTEL COMMUNICATIONS	**X**	**X**	**X**
NEXTLINK LLC – WA	**X**	**X**	
PAC - WEST TELECOMM, INC.	**X**	**X**	**X**
PAGENET	**X**	**X**	**X**
PDGT, COM. INC.	**X**	**X**	**X**
PREFERRED NETWORKS, INC.	**X**	**X**	**X**
RANIER CABLE, INC.			**X**
SPRINT COMMUNICATIONS COMPANY, L.P. – WA	**X**	**X**	**X**
SPRINT SPECTRUM L.P.	**X**	**X**	**X**
TELEPORT COMMUNICATIONS GROUP – SEATTLE	**X**	**X**	**X**
TELIGENT, INC. – WA	**X**	**X**	**X**
THE WESTLINK COMPANY	**X**	**X**	
US WEST COMMUNICATIONS - PACIFIC NWEST BELL	**X**	**X**	**X**
US WEST COMMUNICATIONS, INC.	**X**	**X**	**X**
US WEST NEW VECTOR GRP INC. DBA AIRTOUCH CELL	**X**	**X**	**X**
VOICESTREAM WIRELESS CORPORATION	**X**	**X**	**X**
WINSTAR WIRELESS, INC. – WA	**X**	**X**	
WORLDCOM TECHNOLOGIES, INC. – WA	**X**	**X**	**X**

The relief planning process is open to current and prospective central office code holders. Of these, 11 central office code holders, and 1 potential code holder that do not currently have any central office codes in any of the three area codes participated in the relief planning process:

Airtouch Cellular
AT&T
Century Tel
ELI
GST
GTE
Integra Telecom
MCI Worldcom
Nextlink
Sprint
U S West
WITA – representing small local exchange companies

During the January 5, 2000, relief planning meeting, NANPA presented one overlay relief plan for the 206 area code. NANPA also presented an overlay and three two-way split plans for the 425 area code. Because of a request by the Washington Utilities and Transportation Commission (WUTC) staff, NANPA also gave some time lines of possible combined overlay alternatives for 206, 425 and 253. During the meeting, the three two-way split plans were eliminated from consideration by the industry. Additionally, industry considered different overlay options over multiple existing area codes. Five overlay options were considered:

- Option 1 – Separate and distinct overlays over 206 and 425
- Option 2 – One overlay over both 206 and 425
- Option 3 – One overlay over 206, 425 and 253
- Option 4 – One overlay over 206, 425, 253 and 360 using the new NPA assigned to the 360 Overlay
- Option 5 – One overlay over the entire state, including 206, 425, 253, 360, and 509

Eventually, industry agreed upon an overlay relief plan over all three area codes (206, 425 and 253) to forward to the Commission for consideration. This plan is an overlay area code over the entire geography covered by the 206, 425 and 253 area codes.

To meet statutory requirements, the industry has agreed upon the following implementation schedules:

Option 3 (Overlay over 206, 425 and 253)

	Relief Schedule
Permissive Dialing Begins	Already in effect
Customer Notice to Begin for 10 Digit Dialing	06/16/2001
Mandatory Ten-Digit Dialing (relief and activation will occur approximately 60 days after)	03/16//2002

Under this Option, all rate centers in the current 206, 425 and 253 area codes will be assigned an additional overlay area code. Mandatory 10-digit dialing would be required for all local calls within the overlay area. A customer education period to adjust to the dialing change will be included. Current customers will retain their existing area code and phone number(s). New lines or new customers may be assigned numbers from the new overlay area code.

Expedited Decision Requested

The industry planning team requested that NANPA, as the neutral third-party administrator, present this relief alternative and it respective implementation schedules to the Washington Utilities and Transportation Commission for review and final decision. After the Commission has conducted any proposed hearings or workshops, an expedited decision is respectfully requested to provide adequate time for industry to provide customer notice and customer education in the ordinary course of business.

TAB 2

206 NPA/425 NPA/253 NPA PROPOSED NPA RELIEF PLAN

DOCUMENT LAYOUT

This document provides information regarding the background and current status of the 206, 425 and 253 NPAs ("Numbering Plan Area" or area code), and information regarding the telecommunications industry's exhaust relief planning process. On the following pages, references are made to various tabs, which contain specific information regarding the relief planning process, as shown in the Table of Contents.

BACKGROUND

The 206 area code was introduced in 1947 as Washington's first area code to serve the entire state. In 1957, the 206 area code was split into the 206 and 509 area codes. Subsequently, the 206 was further split in 1995 into the 206 and 360 area code. Finally, in April 1997, the 206 was split into the current 206, 425 and 253 area codes. The 206 area code serves a geographic area that includes mostly the City of Seattle and a few surrounding island areas. The 425 serves a geographic area to the east of Seattle, including Bellevue, Kirkland, Bothell, Renton and Everett. The 253 area code serves the area to the south of Seattle, including Tacoma, Auburn and Kent. There are 5 rate centers in the 206 area code, 13 rate centers in the 425 area code, and 14 rate centers in the 253 area code. NANPA has determined that the 206 area code will exhaust approximately 2nd quarter 2002. NANPA has also determined that the 425 area code will exhaust approximately 3rd quarter 2002. Finally, NANPA has determined that the 253 area code will exhaust approximately 1st quarter 2004. An explanation of the forecasting process is attached to this Relief Plan.

RELIEF PLAN

Upon consensus of the industry representatives present at the planning meeting, NANPA is presenting one relief alternative for consideration by the Washington Utilities and Transportation Commission. This recommended relief alternative is an overlay alternative that would be a single new area code over the entire geography of the 206, 425 an 253 area codes.

There were a total of nine alternatives presented either prior to the planning meeting or during the planning meeting. NANPA presented a single alternative (an overlay) for the 206 area code relief. NANPA also presented four alternatives: an overlay and three split plans for the 425 area code. Additionally, four more alternatives were developed b the industry group at the planning meeting. Each of these alternatives was discussed at the planning meeting and details of that discussion may be found in the minutes of that meeting behind Tab 4 and in the Initial Planning Document behind Tab 5.

The plan chosen by the industry to submit to the Commission is an overlay alternative that would provide relief for all three area codes (206, 425 and 253) in a single overlay. An overlay allows for demand for all new central office codes subsequent to the exhaust of these three area codes to be provided from another area code. With an overlay there will be

multiple area codes serving the same geographic area and it will end further shrinking of the geographic area now served by each of these three area codes. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code. An overlay will not require existing customers to change their area code or telephone number. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers. An overlay will require customers to dial 10 digits for all calls within the geographic area.[1] Because the overlay is a new concept in this part of Washington, it will require customer education. This is especially true since this overlay would cover geography of three existing area codes.

By industry consensus in the meeting held in Bellevue on January 5, 2000, the following alternative is presented to the Washington Utilities and Transportation Commission for consideration of relief of the 206, 425 and 253 area codes.

Overlay Option #3 –Single Overlay Over 206, 425 and 253

Overlay Option #3 is an all services overlay over three area codes. As the 206, 425 and 253 area codes reach exhaust, another area code is assigned to the same geographic territory. After the relief date, requests for new central office codes may be filled from the new area code.

Overlay Option #3 - Overlay of 206, 425 and 253

NPA	Projected Life
Life of Overlay	~4 years (48 months)

The life of the overlay is estimated to be approximately 4 years.

Customer Education – Commission Guidance Requested

The industry has not submitted a customer education proposal as part of this plan, but requests specific guidance from the Commission regarding the scope of such a plan for this area. The industry recognizes that a customer education period will be required regardless of which relief alternative is approved. If the industry recommendation to adopt this Alternative is approved, there will be a dialing plan change to mandatory 10 digit local dialing associated with an overlay.

GENERAL INDUSTRY PROCESS

The process for implementing a new area code in Washington is covered by industry guidelines.

[1] This requirement is from the Federal Communications Commission in *Memorandum Opinion and Order and Order on Reconsideratio*n, CC Docket No. 96-98, 13 FCC Rcd. 19009, 19029 (1998) *(Pennsylvania Numbering Orde*r).

Industry-Approved Documents

Three industry documents have been approved by the industry for use in NPA exhaust relief planning. The documents provide structural and procedural process guidelines.

INC 92-0726-004 "Recommended Notification Procedures to Industry for Changes in Access Network Architecture"

INC 97-0404-016 "NPA Code Relief Planning and Notification Guidelines"

INC 95-0407-008 "Central Office Code (NXX) Assignment Guidelines"

These documents are available on the Internet at: www.atis.org.

Industry Planning Process

The planning process for NPA Relief is established in the industry–approved document *"NPA Code Relief Planning and Notification Guidelines"* (INC 97-0404-016). The purpose of that document is to provide guidelines to NPA Relief Coordinators, affected parties and applicable regulatory authorities within the affected NPAs. It lists the assumptions, constraints, and planning principals used in NPA Code relief planning efforts. It also lists the steps of the NPA Code relief planing process, and describes the alternative methods of providing NPA Code relief and their various attributes. The general attributes of splits and overlays are provided in Tab 6.

Industry " Consensus"

The *"NPA Code Relief Planning and Notification Guidelines"* (INC 97-0404-016) defines the term "consensus" as used in the area code relief planning process, as follows:

> "Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome or result. Substantial agreement means more than a simple majority, but not necessarily unanimity."

Criteria for Evaluating Exhaust Relief Alternatives

The industry employs a set of criteria to use in comparing the 206/425/253 NPA relief alternatives. (Numbers within parentheses (below) refer to the section in the *"NPA Code Relief Planning and Notification Guidelines"* (INC 97-0404-016) on which the criteria are based.)

1. Minimize end users' confusion (Sec. 2.4)
2. Balance the cost of implementation for all affected parties (Sec. 2.4)

3. Provide that customers who undergo number changes shall not be required to change again for a period of 8- 10 years (Sec's. 2.5 & 5.0f)
4. Not favor a particular interest group (Sec. 2.6)
5. Cover a period of at least five years beyond the predicted date of exhaust (Sec. 5.0a)
6. Provide that all of the codes in a given area shall exhaust about the same time in the case of split. In practice, this may not be possible, but severe imbalances, for example a difference of more than 15 years, should be avoided (Sec. 5.0h)
7. Comply with State & Federal statutes, ruling and orders.

PUBLIC NOTIFICATION AND MEETINGS FOR 206/425/253 AREA CODES

In November 1999 NANPA notified the Washington Utilities and Transportation Commission and telephone corporations that the 206 and 425 area codes were projected to exhaust in the second quarter of 2002 and fourth quarter 2003, respectively. Subsequently, NANPA provide notification for discussions of the 253 area code, which is projected to exhaust in the second quarter 2006.[2] In January 2000 an industry meeting was convened to develop alternatives for area code exhaust relief. If the Commission intends to hold public hearings or technical hearings in its process of making a decision on area code relief, to the extent possible, NANPA and members of the industry team will attend those Commission-sponsored hearings.

NPA EXHAUST RELIEF PLANNING

The planning process for the exhaust relief of the 206, 425 and 253 area codes began in November 1999. At that time, the Area Code Relief Coordinator formed an industry team to consider relief options. The relief planning team met in Bellevue on January 5, 2000.

Highlights of the industry planning meetings are found in Tab 4. Maps and summaries of all alternatives considered can be found in Tab 5.

E 9-1-1 CONCERNS

During the industry planning meeting, it was determined that there would be no known negative impacts on the E 9-1-1 systems in Washington. Although there are no known concerns regarding E 9-1-1 problems, this is an issue that must be addressed in the implementation of any alternative decided upon by the Commission. It is known that certain upgrades are required upon the addition of each new area code to a E 9-1-1 tandem router.

INDUSTRY PARTICIPANTS' POSITION PAPERS

[2] Please note that, in January 2000, after notification to industry of these forecasted exhaust dates, a newer forecast of projected exhaust dates has become available. These dates were the dates originally provided in November 1999.

In an effort to provide additional information, clarification and specific company statements from the 206/425/253 area code relief planning team participants, the industry planning team members were given the opportunity to submit position papers as an addendum to this document. No position papers were received by the date of this filing.

NEED FOR TIMELY COMMISSION ACTION

The industry planning team requests the Washington UTC to decide as soon as possible on a recommended relief plan submitted in this report in order to move forward with the final planning and implementation of relief in the 206 , 425 and 253 NPAs.

Industry guidelines require a 12-month notice to the industry at the national level prior to implementation of the new NPA. Therefore, a decision from the Commission in as short a time as possible is requested so service providers can provide notice to their affected subscribers as soon as possible, particularly in the event an accelerated implementation schedule is included in the final decision.

SOURCE OF THIS DOCUMENT

This document was prepared by NeuStar – North American Numbering Plan Administration (NANPA) – Area Code Relief Planning, in conjunction with the 206/425/253 NPA Relief Planning Team. NANPA submits the results of the relief planning process on behalf of the telecommunications industry. As the neutral third-party administrator, NeuStar, in its role as North American Numbering Plan Administration (NANPA) has no independent view regarding the recommended alternatives.

Respectfully submitted,

Bruce H. Armstrong
NPA Relief Planning – Western Region
NeuStar NANPA

NPA EXHAUST FORECAST

The responsibilities of the North American Numbering Plan Administrator (NANPA) include developing and publishing the forecasted exhaust of all area codes (or NPAs) in the North American Numbering Plan Area. On an annual basis as part of the forecasting process, current holders of central office codes (NXXs or prefixes) are requested to contribute data on forward-looking demand for numbering resources to NANPA. This process is referred to as the Central Office Code Utilization Survey (COCUS). Using historic demand and industry-supplied future demand, NANPA creates a forecast for each and every area code in the North American Numbering Plan Area. Since taking over the function of the NANPA from the Regional Bell Operating Companies, this is the first forecast prepared by NeuStar as the NANPA and the first forecast prepared using industry demand forecasts. For the 206/425/253 area codes in Washington, this forecast produces an expected exhaust dates discussed earlier. These forecasts will be updated every six months using actual results. Updates to the forecast have been received in January 2000 that provide different forecasted exhaust dates for these three area codes.

Because of the amount of time required to determine a single implementation plan, have that plan approved by the Washington Utilities and Transportation Commission, and implement the plan is recommended to be at least 30 months, NANPA must begin the relief planning process as soon as we determine that an exhaust date is imminent. The 1999 NANPA forecast was released in May, showing the projected exhaust date of 2nd Quarter 2002 for the 206 area code in Washington. The new forecast released in January 2000 produces the same exhaust date for the 206 area code. In the case of the 425 area code, the May 1999 forecast predicted an exhaust date of 4th Quarter 2003, whereas the January forecast predicts an exhaust of 3rd Quarter 2002. In the case of the 253 area code, the May forecast predicted an exhaust date of 2nd Quarter 2006, whereas the January forecast predicts an exhaust of 1st Quarter 2004.

Forecasting Process

As stated above, NANPA uses both historical demand for central office codes and future demand provided by industry.[3] NANPA employs a forecast that allows for a constant linear growth and what is called a "growth pool". Under normal growth in an area, the growth will follow the same growth pattern as simple demand for actual telephone numbers. This is the portion that is accounted for in the linear growth portion of the forecast. The problem with using just this single growth pattern is that is does not account for the non-linear demand for central office codes when new participants enter the market. As more and more competitive carriers enter the market in Washington, this non-linear demand is exhibited. In order to adequately estimate the future demand for

[3] In the past, industry participation in supplying future demand for numbering resources in the annual COCUS has been voluntary. Industry guidelines and recommendations to the FCC by the North American Numbering Council (NANC) will require mandatory participation in the annual COCUS. The 1999 COCUS was still operating under voluntary participation. Therefore, not all providers participated in the survey.

telephone numbering resources in Washington, both the simple trend line and the growth pool should be considered.

206 Area Code

The NANPA forecast in the 206 area code predicts a linear demand of almost eight (7.8) central office codes per month. The nonlinear portion predicts the need for 35 central office codes between now and 2nd Quarter 2002 for the growth pool. After almost a year's actual growth since the forecast was published, the actual growth rate is tracking very closely to the simple linear forecast. See Figure 1.

In producing the forecast for the exhaust of the 206 area code, NANPA used the combination of the linear trend and the growth pool to arrive at a forecasted exhaust date of 2nd Quarter 2002. The current growth in demand in the 206 area code remains between the "linear simple"[4] curve and the "linear add"[5] curve. This is what one would expect when tracking the proposed forecast. NANPA will continue to track these actual results and, if necessary, modify its forecast if the actual results deviate from the forecast to a significant degree. In fact, the January 2000 revised forecast shows no change in the forecasted exhaust date.

425 Area Code

The NANPA forecast in the 425 area code predicts a linear demand of ten central office codes per month. The nonlinear portion predicts the need for 45 central office codes between now and 3rd Quarter 2002[6] for the growth pool. This forecast was recently revised in January to reflect faster growth than had been predicted in April. See Figure 2.

In producing the forecast for the exhaust of the 425 area code, NANPA used the combination of the linear trend and the growth pool to arrive at a forecasted exhaust date of 3rd Quarter 2002. The current growth in demand in the 425 area code remains between the "linear simple"[7] curve and the "linear add" curve. This is what one would expect when tracking the proposed forecast. NANPA will continue to track these actual results and, if necessary, modify its forecast if the actual results deviate from the forecast to a significant degree.

253 Area Code

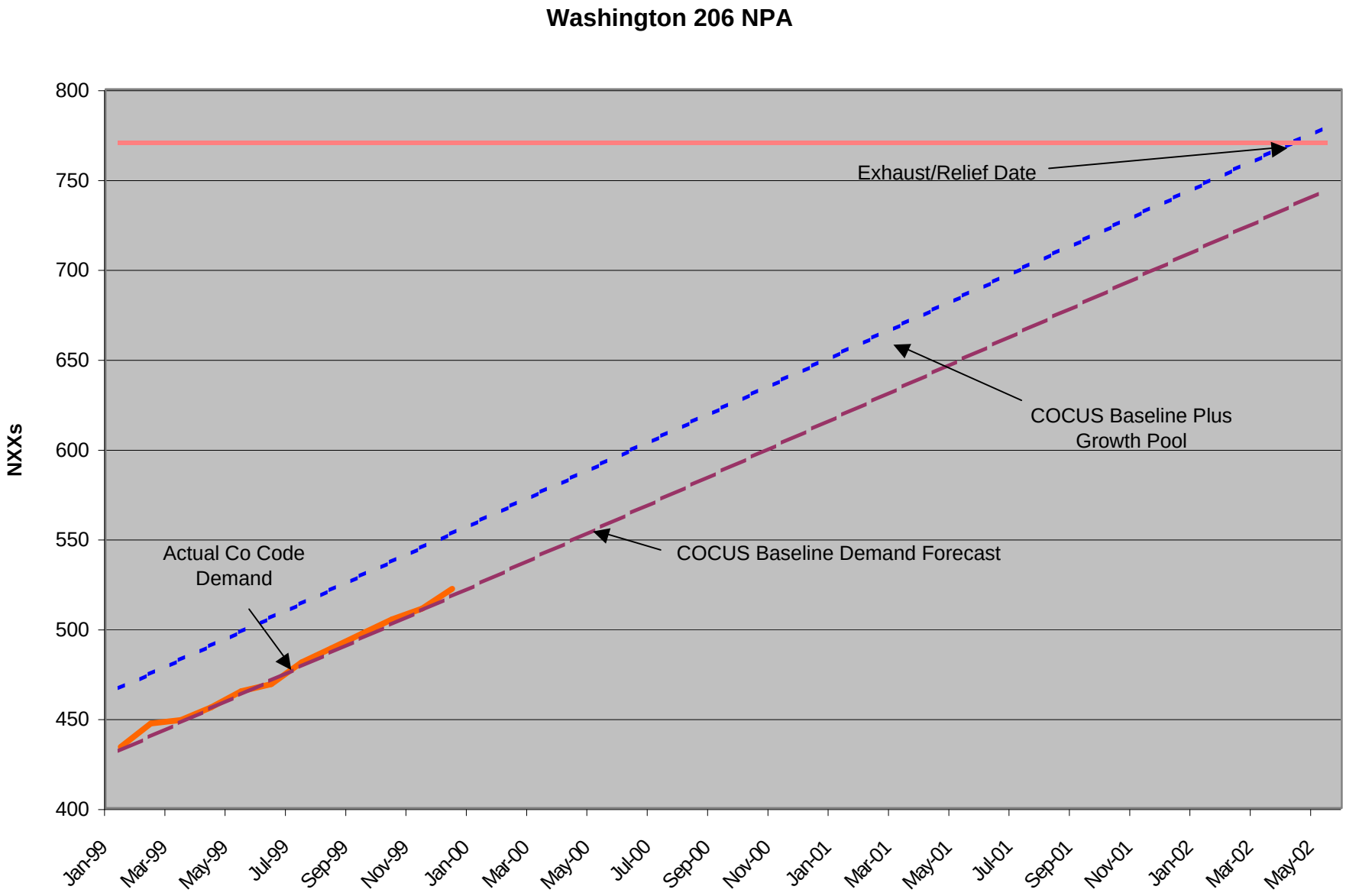
The NANPA forecast in the 253 area code predicts a linear demand of eight central office codes per month. The nonlinear portion predicts the need for 63 central office codes between now and 1st Quarter 2004 for the growth pool. The forecast was recently revised in January to reflect faster growth than had been predicted in April. See Figure 3.

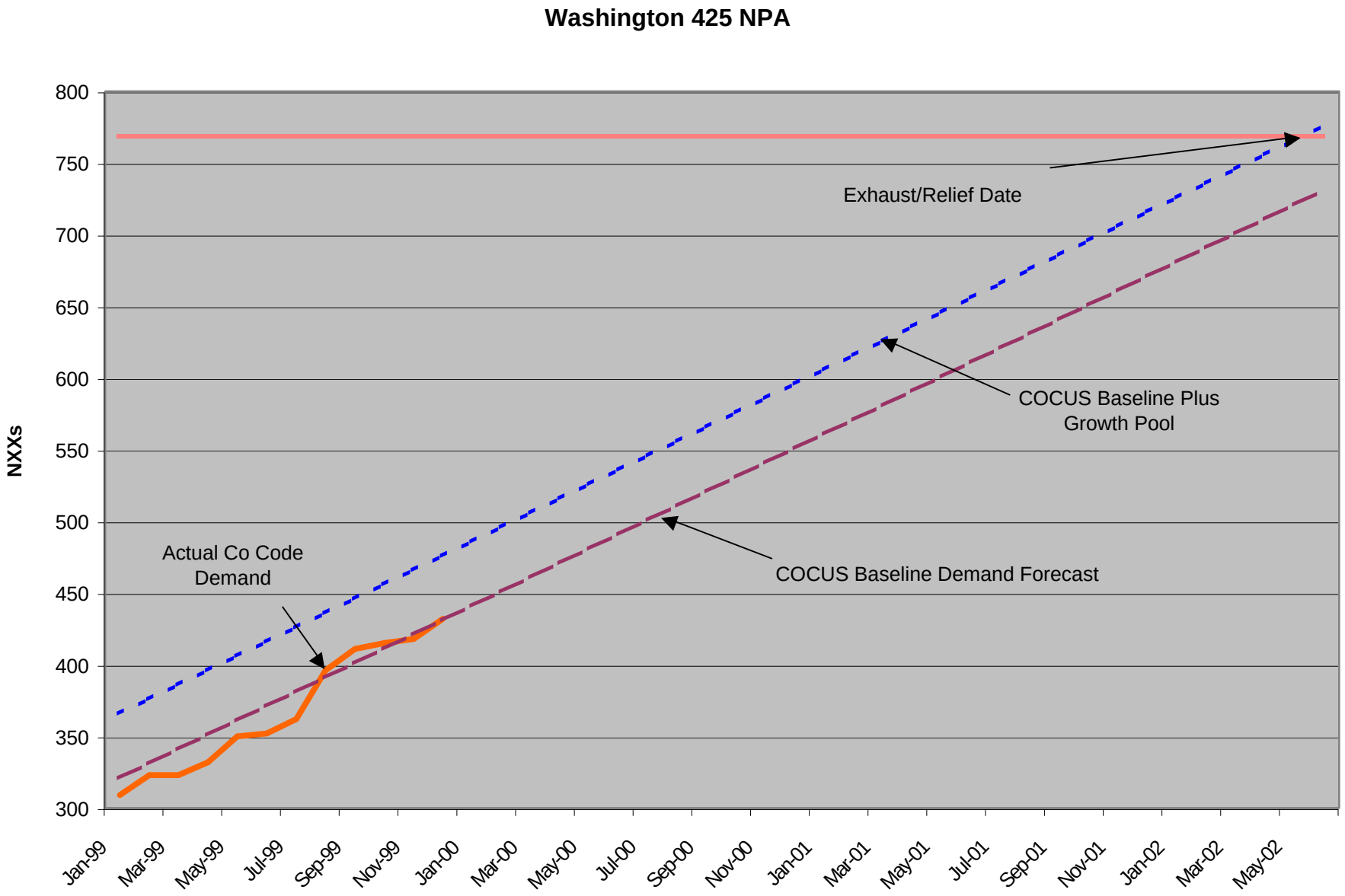
In producing the forecast for the exhaust of the 253 area code, NANPA used the combination of the linear trend and the growth pool to arrive at a forecasted exhaust date of 1st Quarter 2004. The current growth in demand in the 253 area code remains between the "linear

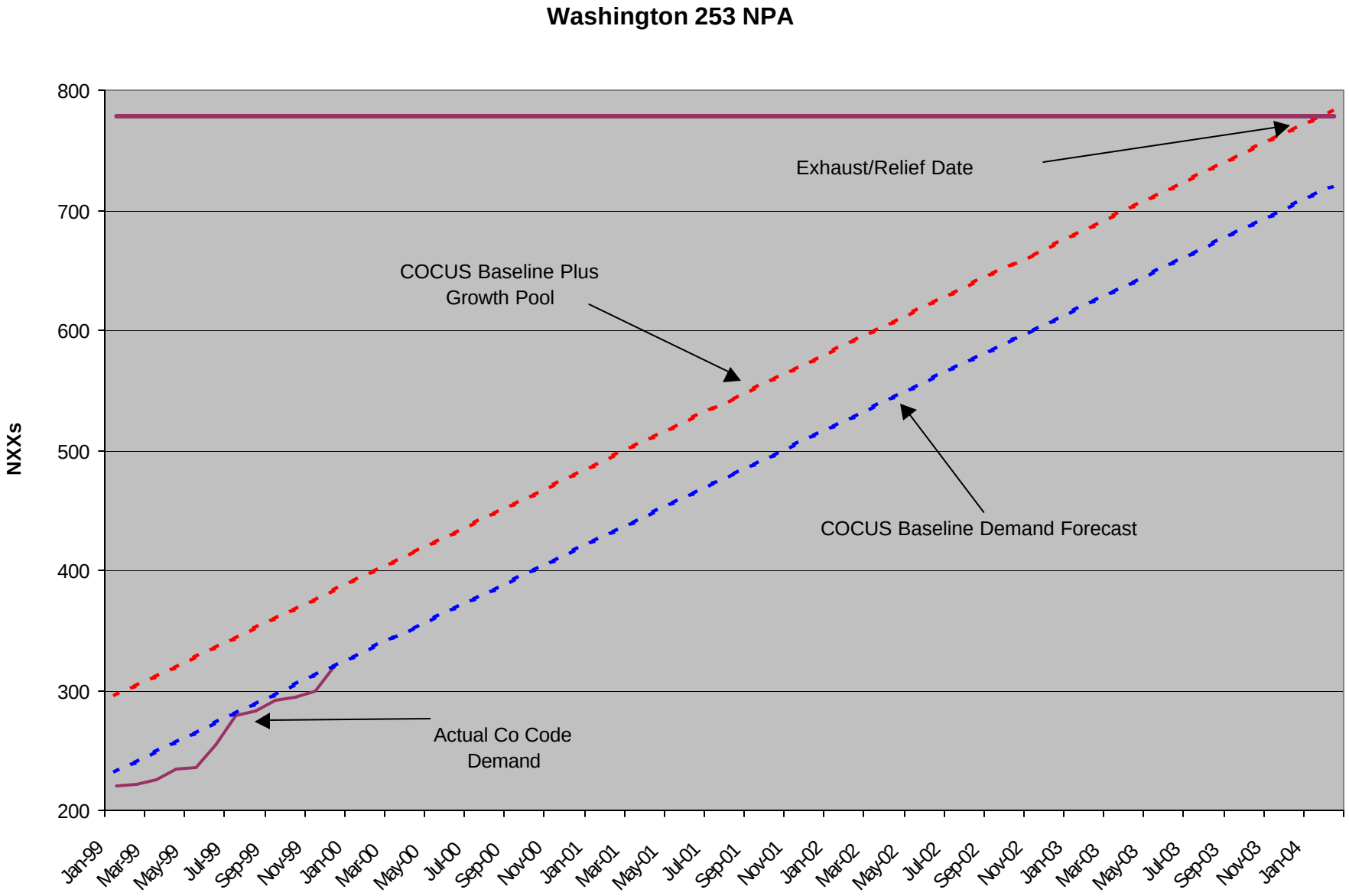
[4] The "linear simple" curve represents the simple linear trend of approximately 8 central office codes per month..
[5] The "linear add" curve represents the additive portion provided for in the growth pool.
[6] Note that this is using the new January 2000 data.
[7] The "linear simple" curve represents the simple linear trend of 10 central office codes per month..

simple”[8] curve and the “linear add” curve. This is what one would expect when tracking the proposed forecast. NANPA will continue to track these actual results and, if necessary, modify its forecast if the actual results deviate from the forecast to a significant degree.

[8] The “linear simple” curve represents the simple linear trend of 8 central office codes per month..


Washington 206 NPA
NXXs
800
750
700
650
600
550
500
450
400
Jan-99
Mar-99
May-99
Jul-99
Sep-99
Nov-99
Jan-00
Mar-00
May-00
Jul-00
Sep-00
Nov-00
Jan-01
Mar-01
May-01
Jul-01
Sep-01
Nov-01
Jan-02
Mar-02
May-02
Exhaust/Relief Date
COCUS Baseline Plus Growth Pool
COCUS Baseline Demand Forecast
Actual Co Code Demand


Washington 425 NPA
NXXs
800
750
700
650
600
550
500
450
400
350
300
Jan-99
Mar-99
May-99
Jul-99
Sep-99
Nov-99
Jan-00
Mar-00
May-00
Jul-00
Sep-00
Nov-00
Jan-01
Mar-01
May-01
Jul-01
Sep-01
Nov-01
Jan-02
Mar-02
May-02
Exhaust/Relief Date
COCUS Baseline Plus Growth Pool
Actual Co Code Demand
COCUS Baseline Demand Forecast


Washington 253 NPA
NXXs
800
700
600
500
400
300
200
Exhaust/Relief Date
COCUS Baseline Plus
Growth Pool
COCUS Baseline Demand Forecast
Actual Co Code
Demand
Jan-99
Mar-99
May-99
Jul-99
Sep-99
Nov-99
Jan-00
Mar-00
May-00
Jul-00
Sep-00
Nov-00
Jan-01
Mar-01
May-01
Jul-01
Sep-01
Nov-01
Jan-02
Mar-02
May-02
Jul-02
Sep-02
Nov-02
Jan-03
Mar-03
May-03
Jul-03
Sep-03
Nov-03
Jan-04

TAB 3

SUMMARY OF INDUSTRY-RECOMMENDED RELIEF ALTERNATIVE

OVERLAY OPTION #3
OVERLAY OVER 206, 425 and 253 NPAs

206/425/253 NPAs / NEW NPA

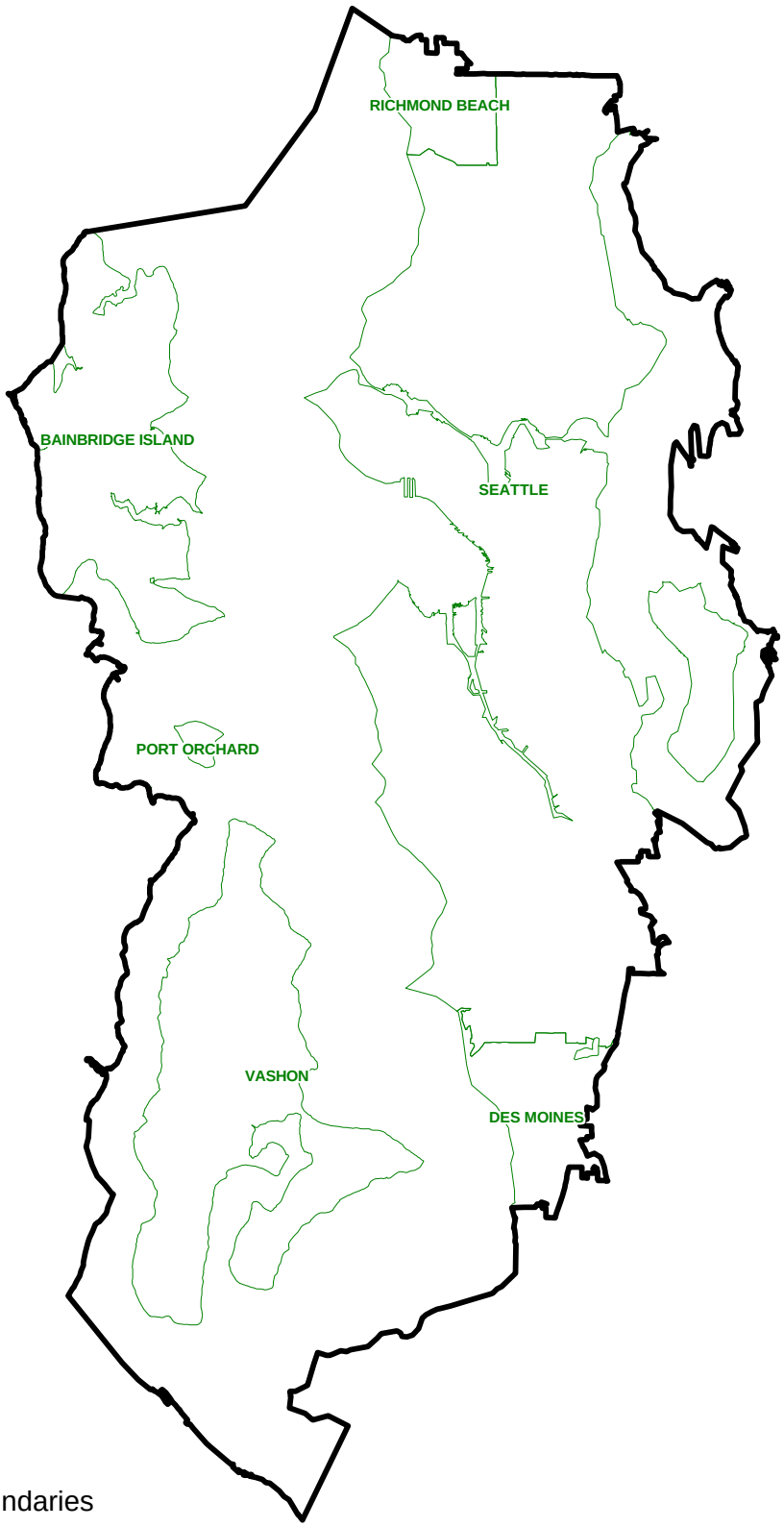
The geographic region served by the 206, 425, and 253 area codes will continue to be served by those area codes, but a new, overlay area code covering the entire area will serve new lines and/or new customers. All toll calls will continue to be dialed using 1+10 digit dialing. All local calls will require 10-digit dialing instead of 7-digit dialing.

Projected Life: approx. 4.0 years (48 months)

DIALING PLAN CHANGE:

A customer education plan, of duration and scope to be determined by the Washington Utilities and Transportation Commission, to adjust to changing to mandatory 10-digit dialing (area code + phone number) for local calls will be implemented prior to the introduction of the new area code.

NPA 206 Rate Center Map

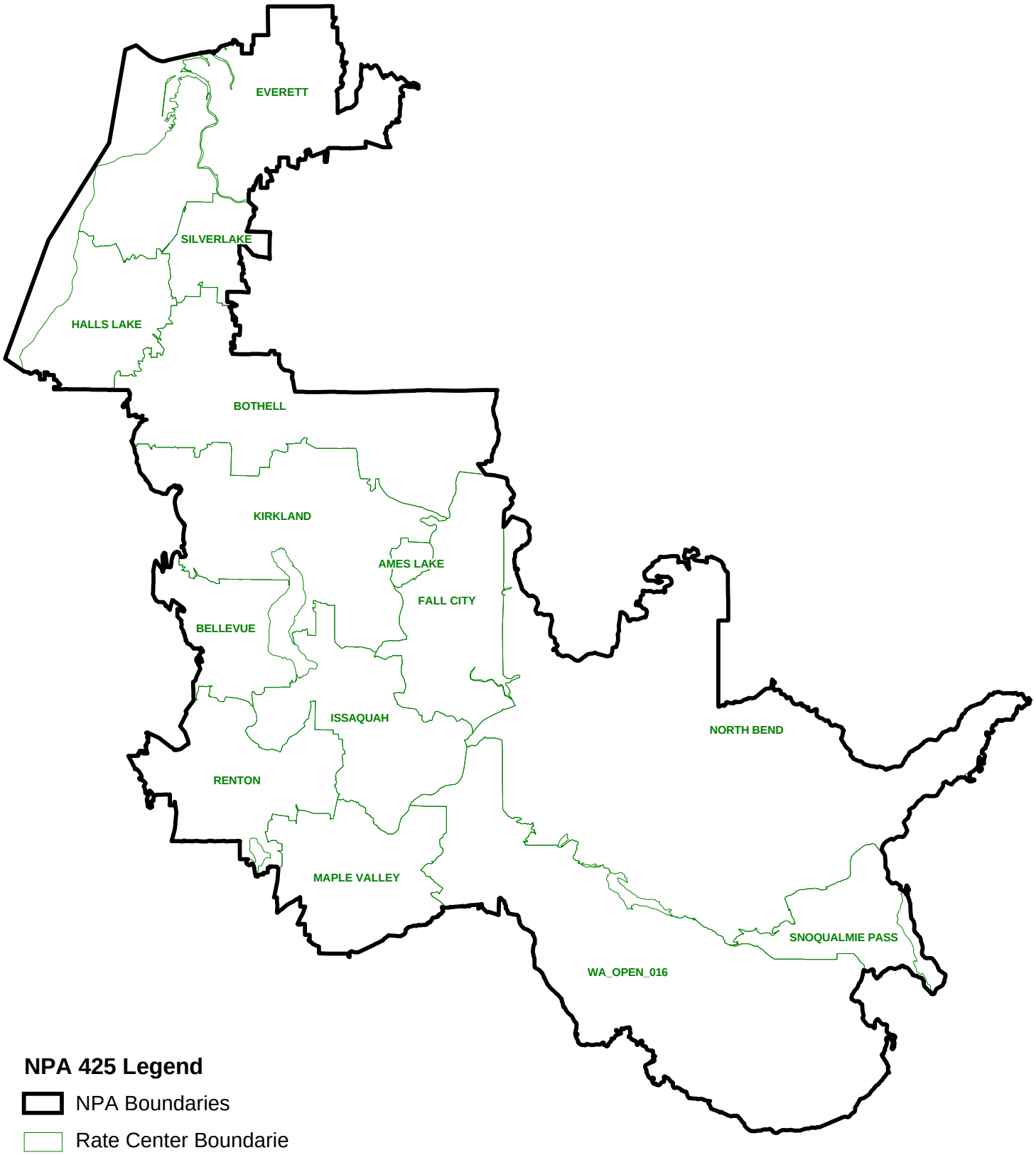


NPA 206 Legend

- NPA Boundaries
- Rate Center Boundaries

Produced by CDS Business Mapping 11/05/99

NPA 425 Rate Center Map



NPA 425 Legend

NPA Boundaries

Rate Center Boundarie

Produced by CDS Business Mapping 11/05/99

206/425/253 AREA CODES
Industry-Recommended Relief Plan
Life Calculation for Overlay Option #3 (Overlay Over 206, 425 and 253 NPAs)

206/425/253 Area Code Assignment Summary

	206 NPA	425 NPA	253 NPA
Assigned NXXs - Old Area Code	**509**	**410**	**315**
Special Use NXXs - Old Area Code	**22**	**25**	**23**
801 NXXs Available for Assignment	**269**	**365**	**462**
Maximum NXXs Available Per Area Code	**778**	**775**	**777**

GROWTH FORECAST

		206 NPA	425 NPA	253 NPA
Year:	2000	108	137	111
Assigned in 1999:		86	129	108
Projected Growth in 1999:		102	97	74

DESCRIPTION OF PLAN SERVING AREA

No changes will occur to current customers in the 206, 425, or 253 area codes. New customers and/or new numbers may be assigned in the new area code in all rate centers in all three current area codes.

PROJECTED LIFE / EXHAUST

Projected Life:	206 NPA	425 NPA	253 NPA
Current Area Code	2.2 years	2.4 years	4.0 years
New Area Code	----------	4.0 years	----------

TAB 4

Final Meeting Minutes

NANPA
206-425 NPA RELIEF INDUSTRY PLANNING MEETING
January 5, 2000

AirTouch Cellular
Employee Development Center
3600 136th Place SE
Bellevue, WA

Host: AirTouch Cellular

Facilitated by: Bruce Armstrong, NeuStar NANPA

*** * * * * * * * * * * * * * * * ***

The Meeting was called to order at 9:05 a.m.

INTRODUCTIONS, AGENDA REVIEW

VOTING :	Mike Miner	Integra Telecom
	Joyce Morris	U S WEST
	Robert Spence	GST
	Robert Hayden	GST
	Suzanne Brooks	MCI WorldCom
	Joan Gage	GTE
	Jack Ott	U S WEST
	Celynn Vandeventer	Sprint
	Joe Settle	Century Tel
	Lynn Espinoza	U S WEST
	Joanne Edelman	AirTouch
	Bob Graybeal	Century Tel
	Audrey Paulsen	Century Tel
	Stan Weeks	AT&T
	Eloise Durant	AT&T
	Roy Burdette	Nextlink
	Charlene Barbknecht	U S WEST
	Jackie Follis	Electric Lightwave Inc.
	Vickie Williams	AirTouch
	Judi McAlpine	AirTouch
	Ron Gayman	AT&T
	Terry Vann	WITA

NON-VOTING:	Bruce Armstrong	NeuStar NANPA Relief Planning

Craig Wiseman	NeuStar NANPA Relief Planning
David Griffith	WUTC
Rebecca Beaton	WUTC
Glen Blackman	WUTC

Introductions and Agenda Review

The original purpose of this meeting was to establish and discuss relief planning efforts for the 206 and 425 NPAs. Supplemental notice was provided code holders and interested parties in the 253 NPA in the event that the relief planning discussions were expanded to include the 253 NPA. NANPA provided several alternatives for relief of the 206 and 425 NPAs. The purpose of this meeting was to determine which relief plan(s) will be submitted to the WUTC for consideration. For the benefit of all attendees, Bruce explained that no one should hesitate to ask questions about the process or to clarify issues during the discussions. Bruce reviewed the ground rules for the meeting.

Review Generic Information for Planning

Bruce reviewed the generic information for planning, including the consensus process, the general attributes of splits and overlays, and the basic planning guidelines. He advised the attendees that the recommendation which NANPA would forward to the Commission would be a consensus agreement from the relief planning team and that any position papers of industry participants may be attached to the report. He also advised the attendees that if they wished to submit comments on relief alternatives to the Commission, they should contact the Commission to determine the process required to do so.

Status and Composition of 206 and 425

December data was reviewed for 206 and 425. The IPD was developed using November data. Therefore, Bruce provided updates based on the December data. He also reviewed the general facts and assumptions for each NPA which are included in the IPD. Data for NPA 253 was also provided for additional information even though it is not projected to exhaust until 2nd Quarter 2006. It was noted that, based on the revised December forecast, 253 is projected to exhaust in 1st Quarter 2004.[1]

Communities of Interest

Bruce asked industry members to contribute any additional information regarding communities of interest.

Review Possible Relief Alternatives

[1] The preliminary December revised NANPA forecast was offered to the industry as additional data in evaluating the exhaust dates. Although the forecast has not been finalized, it is likely more accurate than the April forecast used in the Initial Planning Document.

206 Alt 1: An Overlay. There do not appear to be any split alternatives that have lives that are within the guidelines. This is due to the fact that the majority of growth is in the Seattle Rate Center and the only way to get sufficient life from a split would be to split the Seattle rate center, which is not allowed. Therefore NeuStar has only prepared an overlay alternative for 206.

425 Alt 1: North /South split. It was mentioned the any split that separates local calling areas will result in 10-digit dialing between the affect local calling areas. This may significantly increase the amount of 10-digit dialing. This split would correspond to a split line between the service territory of GTE and the remainder of the NPA.

425 Alt 2: A Split. This split line corresponds essentially to the service territory of U S West. As with Alternative 1, this would increase the amount of 10-digit local calling between NPAs.

425 Alt 3: A Split. This split line carves out the three major population areas of Kirkland, Bellevue and Renton. As with Alternative 1, this would increase the amount of 10-digit local calling between NPAs.

425 Alt 4: An Overlay. This alternative is an overlay option wherein the entire NPA would have a new NPA and would require ten-digit dialing for all local calling in the NPA.

Develop Pros and Cons of Alternatives

Bruce reviewed a chart, comparing the lives of the various relief alternatives and exhaust dates for the three NPA (206,425,253). He then reviewed another chart comparing lives of the three NPAs if an overlay relief was done in two of the NPAs and then in all 3 of the NPAs. This was prepared as a result of discussions with the WUTC staff wherein there was the possibility of proposing an overlay over multiple NPAs. Apparently, the proposal to overlay multiple NPAs had been raised in the 360 NPA Relief Planning meetings.

There was some opinion that people still associate area codes to specific geographic areas. Therefore an overlay over the 3 NPAs might be very confusing to customers. Thus, even though we may achieve longer life from an overall overlay, from a public perspective, we should maintain the geographic identity of an overlay.

Other comments supported an overall overlay over more than one NPA because there are so many area codes now that the geographic significance has gone away. People are getting used to 10 digit dialing even to their next door neighbors.

Splits would result in not only more 10 digit dialing if local calling areas are split, but also number changes for approximately 50% of the customers.

The PUC does not consider 7 digit dialing as the preferred solution. 10 digit dialing is already in place in many places and it would be extremely confusing to customers and difficult to administer a combination of 10 and 7 digit dialing plans. Therefore, the Commission staff recommends that even if a split is recommended, the industry should propose a dialing plan that provides 10 digit dialing for all local calls.

There was an opinion that the industry should be looking at ways to conserve area codes, not creating plans that require multiple area codes just because it maintains existing dialing plans and postpones 10 digit dialing for a few more years. Inefficient use of NPAs will unnecessarily advance the exhaust of the NANP and push us into 11 or 12 digit dialing.

The Washington Commission is currently working on number conservation issues such as number pooling and rate center consolidation. The Commission staff advised the meeting attendees to keep this in mind while considering the various relief alternatives.

There was discussion that 911 issues should be addressed before selecting alternatives. U S WEST stated that any modifications that may be needed in the 911 network will be made. However, except for the modifications needed in the 360 area, they are not aware of any problems at this time. Furthermore, from a 911 perspective, the fewer area codes added the better.

A straw poll was taken to determine if there was support to eliminate all of the three proposed split alternative for the 425 NPA. There were none opposed .It was determined that consensus was reached to eliminate the split alternatives. This decision was based upon a general opinion that any of the split alternatives would split local calling areas and, thus, would require ten-digit local calling across NPA boundaries. Customer confusion was a concern of the industry regarding multiple geographic NPAs in a small area.

There was discussion regarding the remaining overlay proposals: A suggestion was made to just go to 10 digit dialing in the entire western Washington area and put an overlay over 206, 425 and 253. Other decisions that must be made involve how an overlay will be implemented in each NPA based on their individual exhaust dates and how the surplus codes in each NPA will be assigned after implementation.

There was a discussion on including the overlay over all of Western Washington, including the overlay recently approved for the 360 area. This alternative would expand the new overlay NPA for 360 to eventually include the entire geography of 360, 425, 206, and 253. An additional suggestion was made to include an overlay over the entire State. It was also mentioned that if this group decides to propose an overlay over the entire western area or the entire state, additional meetings would be required in order to include other affected service providers.

At this time the group boarded five options:

Option 1 – Separate and distinct overlays over 206 and 425
Option 2 – One overlay over both 206 and 425
Option 3 – One overlay over 206, 425 and 253
Option 4 – One overlay over 206, 425, 253 and 360 using the new NPA assigned to the 360 Overlay
Option 5 – One overlay over the entire state, including 206, 425, 253, 360, and 509

The concept of a statewide overlay (Option 5) would include removing the geographic significance of all NPAs. NPAs and telephone numbers could be shared statewide. Options 1-4 would retain the geographic areas served by the existing NPAs.

It was recognized that each option placing an overlay over more than one NPA would reduce the geographic significance of the original NPAs.

Option 3, which includes 253, is an extension of Option 2. An opinion was expressed that Option 3 can be decided when relief meetings for 253 are convened.

Under Option 2, 253 would be the only area that does not have mandatory 10D dialing.

In response, it was suggested advancing the relief date for 253 should not be done just to make things consistent throughout the western area.

There was an objection to providing relief to an area that does not need relief for 4 years.

It was mentioned that there are benefits for providing customer education to all 3 NPAs at one time versus a couple now and the other later.

There was discussion that Option 4 had been rejected at the 360 NPA Relief planning meeting. Therefore, the industry has already indicated its preference. If this option is to be considered, NANPA should provide notice to the 360 NPA participants before we recommend this option

It was noted that the only companies having NXXs in the 360 NPA not present at this meeting are independent companies. A member noted that Terry Vann from WITA would be in attendance in the afternoon to represent independents. Further discussion on this issue was delayed pending Terry's arrival.

Options evaluated:

Option 1: Separate Overlays for 206 and 425. Consensus reached to eliminate. Discussions in favor of eliminating this option centered around the immediate use of two NPAs and the waste of NPA resources. Proponents of this option preferred the retention of the geographic identity associated with each existing NPA.

Option 2: Combined Overlay over 206 and 425 Consensus reached to eliminate. This was the last of the options to be eliminated. Similar arguments as in the elimination of Option 1 in support and in opposition to its elimination were heard.

Option 3: Combined overlay over 206, 425, 253 Consensus reached to keep.The industry decided that this was the best of the options. Many felt that it was the best use of the NPA resource and the best for customer education and customer understanding. Also, because of the potential of number conservation efforts by the industry and the Commission, this would be the best alternative. Opposition to this option centered around the relatively short exhaust predictions of the new combined overlay and the loss of geographic significance of the NPAs.

Option 4: Expand 564 to include all western Washington consensus reached to eliminate. It was decided to eliminate this alternative mostly due to the much shorter exhaust forecasts that might ensue for a combined overlay, the lack of notice to other 360 NPA code holders and the fact that industry had rejected this alternative at the 360 meeting.

Option 5: Overlay over entire State. This option would cause problems with 911. Therefore it was determined that this was not viable at this time. Consensus was reached to eliminate this alternative.

Set Place Dates : Permissive/ Mandatory/ End of Mandatory

It was noted that all of Western Washington is already in Permissive Dialing for ten-digit local calling.

Customer Notice: June 16, 2001 to begin 10D dialing and notification of when new NPA will be in service.

Mandatory: March 16, 2002

Test Number: One number from New NPA dialable on 10digit local basis. U S West will provide an announcement for local and long distance. All local service providers are requested to open up the number as a LOCAL 10D number.

Final Filing Issues

Filing will be made February 16, 2000. Filing will be in same format as the 360 filing. Commission recommended service providers conduct focus meetings and include results in comments to the Commission. Response from service providers was that focus meetings generally have very poor turnout and having these meetings prior to Commission decision confuses customers. Also, previous focus group results were available. At the 360 meeting, the industry decided not to have focus meetings.

ESTABLISH TECHNICAL COMMITTEE

U S West will develop a technical committee.

Meeting adjourned at 2:15 PM

TAB 5

NEU STAR

December 6, 1999

To: 206/425 NPA Code Holders & Other Industry Members

Re: Industry Meeting for 206 and 425 NPAs (Washington)

The 206 area code in the State of Washington is currently projected to exhaust in the 2nd Quarter 2002. The 425 area code in the State of Washington is currently projected to exhaust 4th Quarter 2003.

Enclosed is the Initial Planning Document (IPD) for the 206 and 425 NPA Relief Industry Meeting on January 5-6, 2000. Several relief alternatives are presented for your consideration and study before the meeting. Please note that information is contained in this IPD regarding the 253 NPA; however, this information is only provided in the event that the 253 NPA becomes part of a relief plan for the 206 and 425 NPAs.

Included in this package are alternative maps and a fact sheet with the status of the 206 and 425 NPAs and the assumptions used in developing the alternatives. If you wish to present any additional alternatives for the industry to consider, please be prepared to present it at the meeting on January 5-6 or prior to the meeting. Service providers are also encouraged to bring their local public/external affairs representatives who can advise the industry about community of interest issues and potential growth requirements for each affected community in the 206 and 425 NPAs. This will assist the planning committee in evaluating the impact of various NPA relief proposals as well as determining where public meetings might be conducted.

The meeting will be held at Airtouch Employee Development Center, 3600 136th Place, SE, Bellevue, Washington, 98006, January 5-6, 2000, 9 a.m. to 5:00 p.m. An agenda is enclosed for your information.

If you plan to attend this meeting, please complete and return the enclosed Advanced Meeting Reservation Form as early as possible, but no later than December 29, 1999 so we can make plans to accommodate everyone who wishes to attend.

Please give me a call at 303-774-8915 if you have any questions or require additional information.

Bruce H. Armstrong
NPA Relief Planner – Western Region
NANPA

Enclosures

Cc: Rebecca Beaton – WUTC Staff

INITIAL PLANNING DOCUMENT
FOR THE WASHINGTON 206 and 425 NPAs

December 8, 1999

Prepared by
Bruce Armstrong - Western Region Area Code Relief Planning
North American Numbering Plan Administrator (NANPA)

NPA Relief Alternatives and Assumptions

General Facts and Assumptions

- This Relief Planning effort focuses on the Greater Seattle Area. It includes planning for the 206 NPA and the 425 NPA. Facts and assumptions concerning these two NPAs will follow. Additionally, because of the geographic proximity, community of interest and possible related discussions, informational facts regarding the 253 NPA are included also.
- The 206 area code was the original NPA for Washington in January 1947. It has been split several times since then. The 509 (Eastern Washington in 1957), the 360 NPA (in 1995) and the 253 and 425 NPAs in 1997 came out of the original 206 NPA.

206 NPA

- The 1999 NANPA NPA Exhaust Projection forecast utilizing the Central Office Code Utilization Survey (COCUS) forecast predicts an average central office code growth of 102 codes per year for the 206 NPA.
  - Current NANPA forecasts predict that the linear growth rate for the 206 area code is about 7.8 central office codes per month (or approximately 94 codes per year).
  - In addition to the linear growth, these same forecasts predict a need for an additional 25 codes for a growth pool (*i.e.*, central office codes necessary for market entry in new areas to establish a footprint) from April, 1999 until exhaust of the area code.
  - Together, the linear demand and the growth pool predict the exhaust date of 2nd Quarter 2002 for the 206 area code.
- As of November 1999, there have been 502 central office codes assigned in the 206 area code. There are 269 central office codes available for assignment.
- There are 5 rate centers in the 206 area code (Seattle, Bainbridge Island, Des Moines, Richmond Beach, and Vashon).
- According to the 11/99 LERG, there are 40 code holders in the 206 area code [3 ILECs with 234 NXXs, 23 CLECs with 119 NXXs, 2 local resellers with 3 NXXs, 12 Wireless and PCS with 146 NXXs].
- According to a comparison between November, 1998 and November, 1999 LERG, code growth during the past 12 months has been 88 central office codes (21% CO code growth in one year):
  - By Rate Center (selected):
    - Seattle - 78 codes 20% CO Growth
    - Richmond Beach - 4 codes 80% CO Growth
    - All Other RCs - 6 codes 25% CO Growth
  - By Code Holder Category
    - RBOC 20 codes 10% Growth
    - ILEC 1 code 17% Growth
    - CLEC 37 codes 45% Growth
    - PCS 11 codes 183% Growth
    - Wireless 16 codes 14% Growth

- The 206 NPA rate centers are located primarily in King County. According to the U.S. Census Bureau, the total annual population growth in King County is just over 15,000 annually (0.9%).

425 NPA

- The 1999 NANPA NPA Exhaust Projection forecast utilizing the Central Office Code Utilization Survey (COCUS) forecast predicts an average central office code growth of 97 codes per year for the 425 NPA.
  - Current NANPA forecasts predict that the linear growth rate for the 425 area code is about 6.8 central office codes per month (or approximately 82 codes per year).
  - In addition to the linear growth, these same forecasts predict a need for an additional 70 codes for a growth pool (*i.e.*, central office codes necessary for market entry in new areas to establish a footprint) from April, 1999 until exhaust of the area code.
  - Together, the linear demand and the growth pool predict the exhaust date of 4th Quarter 2003 for the 425 area code.
- As of November 1999, there have been 409 central office codes assigned in the 425 area code. There are 361 central office codes available for assignment.
- There are 13 rate centers in the 425 area code (Ames Lake, Bellevue, Bothell, Everett, Fall City, Halls Lake, Issaquah, Kirkland, Maple Valley, North Bend, Renton, Silver Lake, and Snoqualmie Pass).
- According to the 11/99 LERG, there are 35 code holders in the 425 area code [3 ILECs with 202 NXXs, 20 CLECs with 137 NXXs, 1 local resellers with 1 NXX, 12 Wireless and PCS with 134 NXXs].
- According to a comparison between November, 1998 and November, 1999 LERG, code growth during the past 12 months has been 122 central office codes (43% CO code growth in one year):
  - By Rate Center (selected):
    - Bellevue - 52 codes 80% CO Growth
    - Everett - 17 codes 24% CO Growth
    - Kirkland - 9 codes 20% CO Growth
    - Renton - 13 codes 50% CO Growth
    - Bothell - 9 codes 39% CO Growth
    - Halls Lake - 9 codes 38% CO Growth
    - All Other RCs - 13 codes 38% CO Growth
  - By Code Holder Category
    - RBOC 19 codes 33% Growth
    - ILEC 4 codes 3% Growth
    - CLEC 81 codes 142% Growth
    - PCS 4 codes 57% Growth
    - Wireless 14 codes 32% Growth
- The 425 NPA rate centers are located primarily in King and Snohomish Counties. According to the U.S. Census Bureau, the total population growth in King County is just over 15,000 annually (0.9%). The total population growth for Snohomish County is almost 19,000 annually (3.3%).

Supplemental Facts Regarding the 253 NPA

- The 1999 NANPA NPA Exhaust Projection forecast utilizing the Central Office Code Utilization Survey (COCUS) forecast predicts an average central office code growth of 74 codes per year for the 253 NPA.
  - Current NANPA forecasts predict that the linear growth rate for the 253 area code is about 5.0 central office codes per month (or approximately 60 codes per year).
  - In addition to the linear growth, these same forecasts predict a need for an additional 98 codes for a growth pool (*i.e.*, central office codes necessary for market entry in new areas to establish a footprint) from April, 1999 until exhaust of the area code.
  - Together, the linear demand and the growth pool predict the exhaust date of 2nd Quarter 2006 for the 253 area code.
- As of November 1999, there have been 315 central office codes assigned in the 253 area code. There are 457 central office codes available for assignment.
- There are 14 rate centers in the 253 area code (Arletta, Auburn, Burley, Des Moines, Fox Island, Gig Harbor, Graham, Kent Lakebay, Puyallup, Roy, Sumner, Tacoma and Tacoma Waverly).
- According to the 11/99 LERG, there are 30 code holders in the 253 area code [2 ILECs with 142 NXXs, 17 CLECs with 106 NXXs, 1 local reseller with 1 NXX, 10 Wireless and PCS with 66 NXXs].
- According to a comparison between November, 1998 and November, 1999 LERG, code growth during the past 12 months has been 98 central office codes (45% CO code growth in one year):
  - By Rate Center (selected):
    - Tacoma - 45 codes 40% CO Growth
    - Auburn 11 codes 48% CO Growth
    - Des Moines 6 codes 50% CO Growth
    - Tacoma Waverly 12 codes 133% CO Growth
    - Kent 8 codes 33% CO Growth
    - Puyallup 7 codes 64% CO Growth
    - All Other RCs - 9 codes 35% CO Growth
  - By Code Holder Category
    - RBOC 9 codes 7% Growth
    - ILEC 0 codes 0% Growth
    - CLEC 73 codes 215% Growth
    - PCS 2 codes 33% Growth
    - Wireless 14 codes 32% Growth
- The 253 NPA rate centers are located primarily in King and Pierce Counties. According to the U.S. Census Bureau, the total population growth in King County is just over 15,000 annually (0.9%). The total population growth for Pierce County is over 11,000 annually (1.7%).

Area Code Splits

1) All split plans will require ten-digit local dialing between NPAs. If any local calling areas are split by an NPA, the local calling area will remain the same; however, ten-digit dialing will be required across NPA boundaries. Within an NPA, seven-digit local dialing would be permitted.

2) Code growth in each rate area will continue at the current average rate of growth. This growth rate is proportional among all rate centers for both sides of the split.

3) The 206 area code will exhaust in approximately 30 months (2nd Quarter 2002). The 425 area code will exhaust in approximately 47 months (4th Quarter 2003).

4) All end office and tandem NXX codes in the "New Area Code" area will change to the new area code.

Area Code Overlays

1) A new area code will be assigned to all of the geographic area currently served by the current NPA. In the case of an all-services overlay, customers will retain their current telephone numbers. However, in an all-services overlay, ten-digit dialing will be required on all calls throughout the entire NPA.

2) Prefix codes (NXXs) in the overlay NPA will be assigned upon request with the effective date of the new area code. At the exhaust of NXX codes in the existing area code, all code assignments will be made in the overlay area code.

3) Code growth will continue at the current rate of growth. If a combined overlay over both NPAs is deployed, the rate of growth is assumed to be the sum of the historical growth rates for each NPA.

4) The 206 area code will exhaust in approximately 30 months (2nd Quarter 2002). The 425 area code will exhaust in approximately 47 months (4th Quarter 2003).

WASHINGTON NPA RELIEF ALTERNATIVES

This Planning Document addresses relief alternatives for two NPAs (206 and 425) and the potential of inclusion of a third NPA (253). The following document contains independent relief alternatives for both 206 and 425. Following the independent relief alternatives, the document also contains potential combined relief alternatives that provide relief for both NPAs.

Independent 206 NPA Proposed Relief Alternative

Alternative #1- 206 - Overlay of Entire NPA

NPA	Projected Life	NXXs
Life of Overlay	7.2 years (86 months)	502

- This is a standard all-services overlay for the entire NPA.
- Since the Seattle rate center is such a dominant portion of the CO codes (93 %), any split alternatives would not meet industry guidelines.

Independent 425 NPA Proposed Relief Alternatives

Alternative #1 - 425 - Two-way split corresponding to an east-west line between the Kirkland and Bellevue rate centers.

NPA	**Projected Life**	**NXXs**
North Area NPA	7.3 years (88 months)	218
South Area NPA	9.6 years (115 months)	191

Notes:

- This split line keeps the GTE territory together in a single NPA. The five GTE rate centers in the northern part of the NPA (Everett, Silverlake, Halls Lake, Bothell and Kirkland) would be split off from the remainder of the NPA.
- This alternative meets industry guidelines unless customers in the North area are required to change telephone numbers in 8-10 years. Therefore, any subsequent relief activity should recognize this guideline.

Alternative #2 - 425 - Two-Way Split corresponding to a line separating out the four U S West rate centers (Bellevue, Issaquah, Renton and Maple Valley) from the remainder of the NPA.

NPA	**Projected Life**	**NXXs**
USWC territory NPA	10.3 years (124 months)	183
Remainder of 425 NPA	6.8 years (81 months)	226

Notes:

- This proposed split alternative follows the rate center boundaries of the U S West rate centers (Bellevue, Issaquah, Renton and Maple Valley).

- This alternative meets industry guidelines unless customers in the non-USWC area are required to change telephone numbers in 8-10 years. Therefore, any subsequent relief activity should recognize this guideline.

Alternative #3 -425 - Two-Way Split corresponding to the rate centers (Kirkland, Bellevue and Renton) on the westernmost portion of the current 425 NPA.

NPA	**Projected Life**	**NXXs**
Western Rate Centers NPA	8.0 years (96 months)	209
Remainder of 425 NPA	8.8 years (105 months)	200

Notes:

- This proposed split alternative follows rate center boundaries of three highly populated rate centers (Kirkland, Bellevue, and Renton) across Lake Washington from Seattle.
- This alternative meets industry guidelines but only marginally if customers in either area are required to change telephone numbers in 8-10 years. Therefore, any subsequent relief activity should recognize this guideline.

Alternative #4 - 425 - Overlay of Entire NPA

NPA	Projected Life	
Life of Overlay	8.3 years (100 months)	409

- This is a standard all-services overlay for the entire NPA.
- This alternative meets industry guidelines.

Combined Relief Alternatives for 206 and 425 NPAs

Because of the high growth in CO code demand in the greater Seattle area, potential NPA relief in this area includes alternatives that combine the relief for both NPAs. This section develops an alternative that ultimately deploys an overlay solution over the entire geographic area served by both NPAs. Two different implementation scenarios are presented in this document:

1. Deploy an overlay relief plan over both the 206 and the 425 NPAs but requiring that the remaining NXXs in the 425 to remain only in the historic 425 area.
2. Deploy an overlay relief plan over both the 206 and the 425 NPAs and allowing the remaining 425 NXXs to be deployed anywhere in the overlay area.

Either of these alternatives has the same projected life; however, the first alternative requires additional administrative work for CO Code Administration.

Alternative #1 – Combined 206/425 Overlay

NPA	Projected Life	NXXs
Combined Overlay	4.6 years (55 months)	409+502 (911)
Subsequent Overlay	3.8 years (34 months)	

Notes:

- This proposed overlay would be implemented in sufficient time to provide relief for the 206 NPA.
- Due to the implementation of this proposal to satisfy the exhaust of the 206 NPA, there will be unassigned NXXs still remaining in the 425 NPA. These NXXs will be available for use in the overlay area.
- Although the subsequent relief may or may not be another overlay, a second overlay would provide an additional 3.8 years life.
- This alternative may not meet all industry guidelines in that the relief period does not cover a period more than five years beyond the predicted date of exhaust.

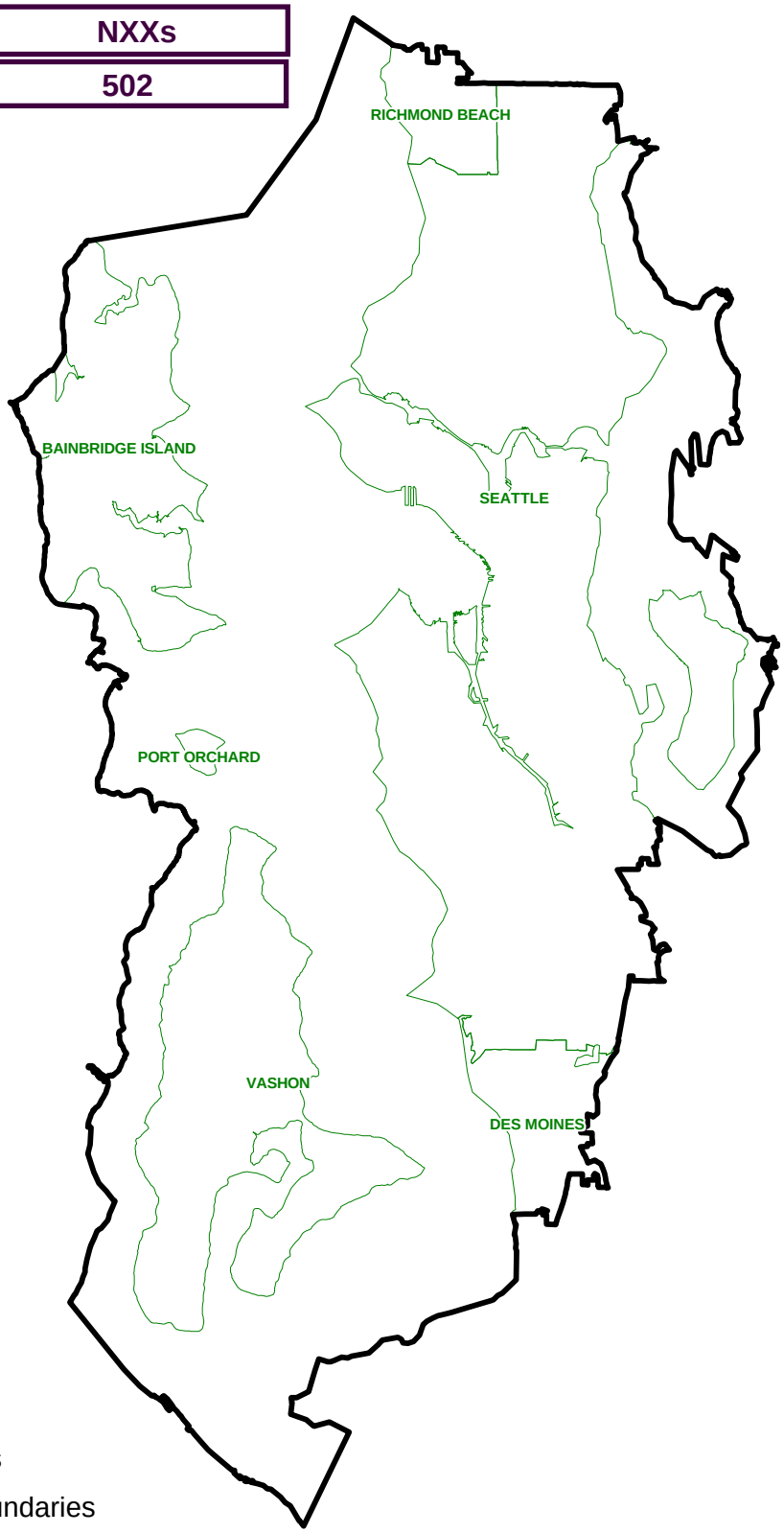
Supplemental Notes Regarding the Inclusion of the 253 NPA in a Combined Relief Plan

- The 253 NPA by itself is not scheduled to exhaust until 2nd Quarter 2006. Given current growth patterns, no relief planning for this NPA would begin until near the end of 2003.
- If the 253 NPA is considered as part of this relief plan for an overlay, the growth rate of the combined overlay area will be the sum of the growth rates for the existing NPAs.
- If the 253 NPA were to be part of an overlay for all three NPAs (206, 425 and 253), the projected life of the combined overlay would be approximately 49 months or 4.1 years. Each additional overlay over that area would last approximately 34 months or 2.8 years. Similarly to the two NPA overlay described above, decisions would need to be made regarding the disposition of remaining NXX in the 425 and 253 NPAs.

NPA 206 Rate Center Map

Alternative #1 - Overlay

	MTE	NXXs
Overlay	86	502



NPA 206 Legend

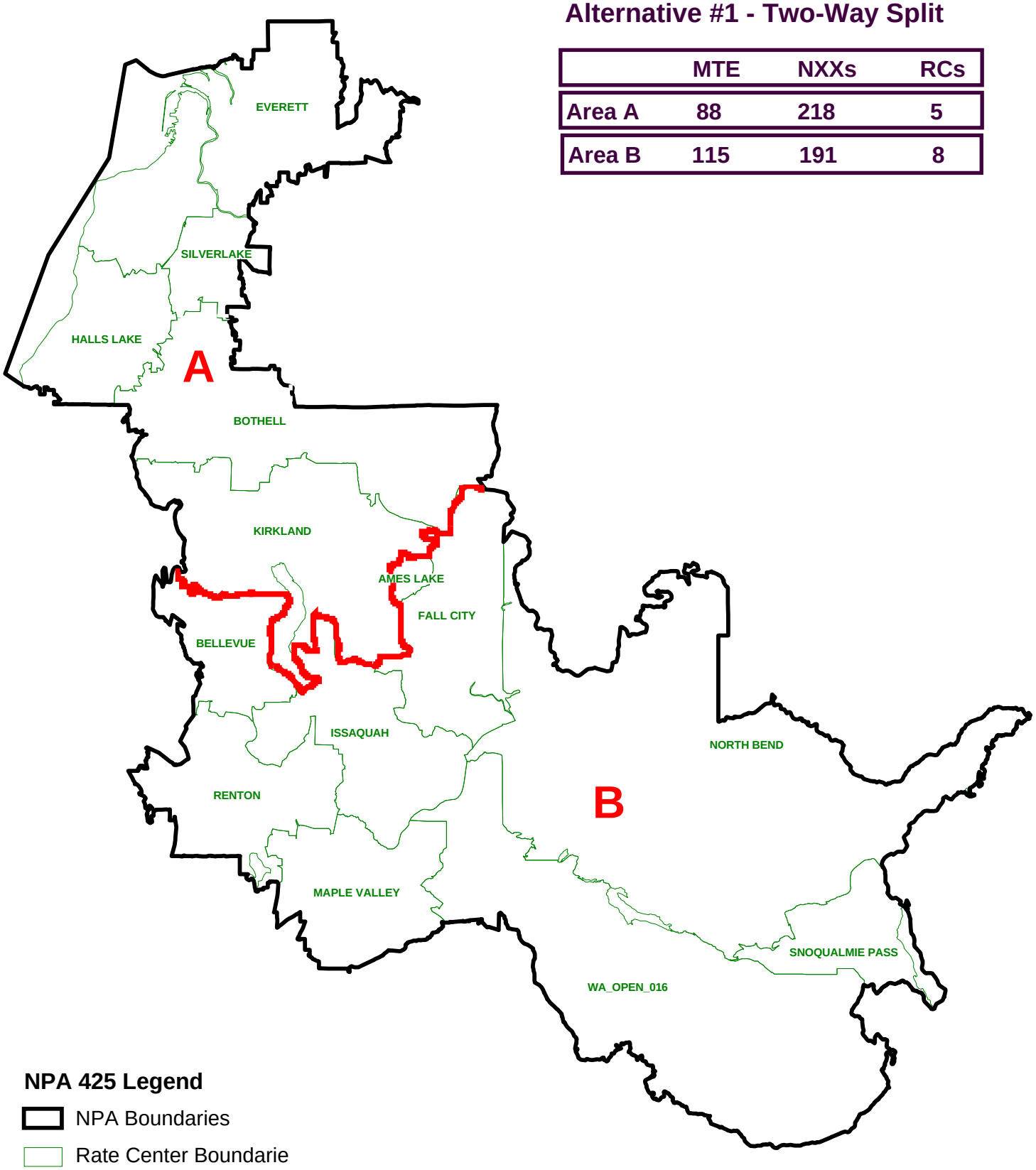
- NPA Boundaries
- Rate Center Boundaries

Produced by CDS Business Mapping 11/05/99

NPA 425 Rate Center Map

Alternative #1 - Two-Way Split

	MTE	NXXs	RCs
Area A	88	218	5
Area B	115	191	8



NPA 425 Legend

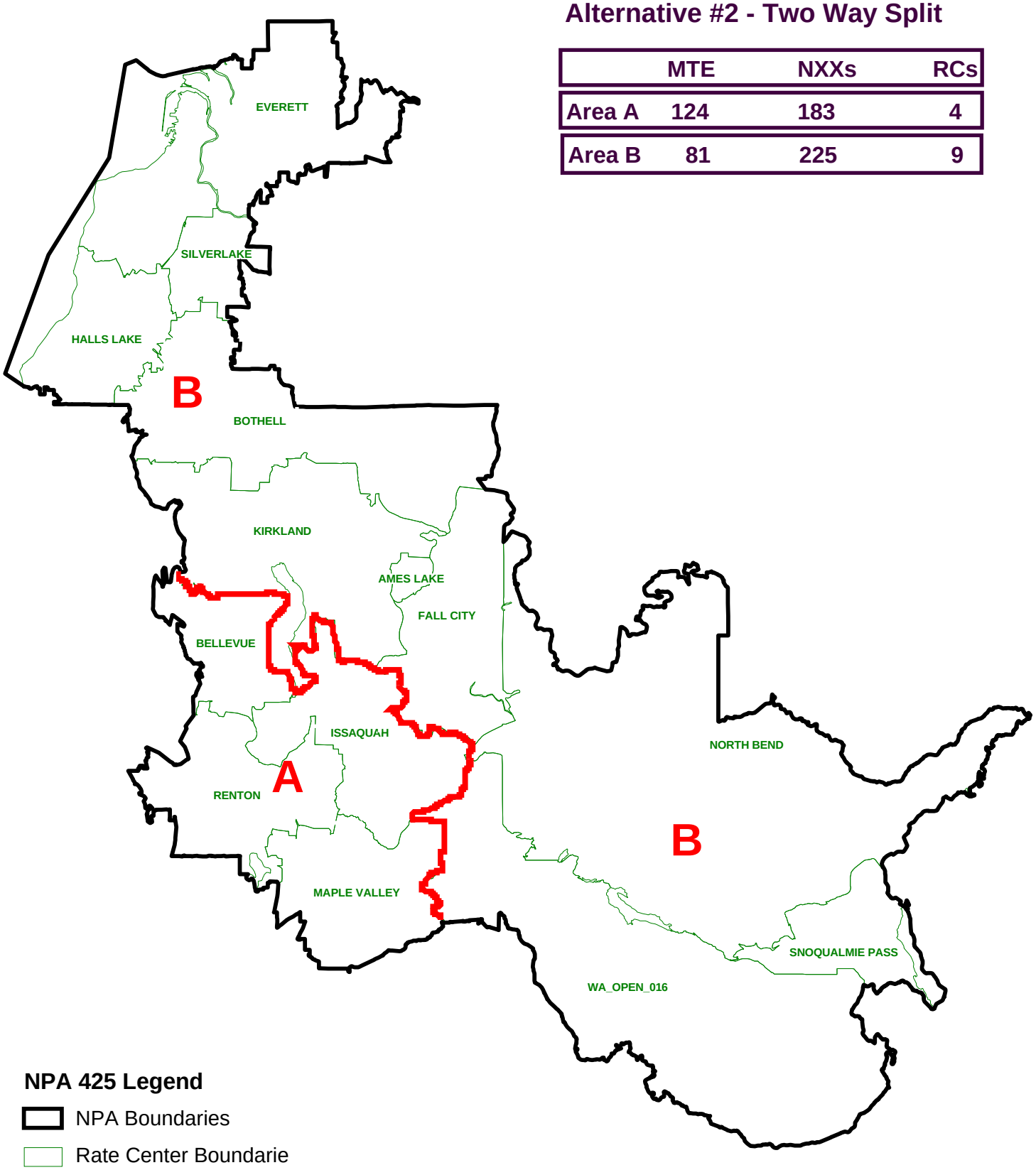
- NPA Boundaries
- Rate Center Boundarie
- Proposed Split Line

Produced by CDS Business Mapping 11/05/99

NPA 425 Rate Center Map

Alternative #2 - Two Way Split

	MTE	NXXs	RCs
Area A	124	183	4
Area B	81	225	9



NPA 425 Legend

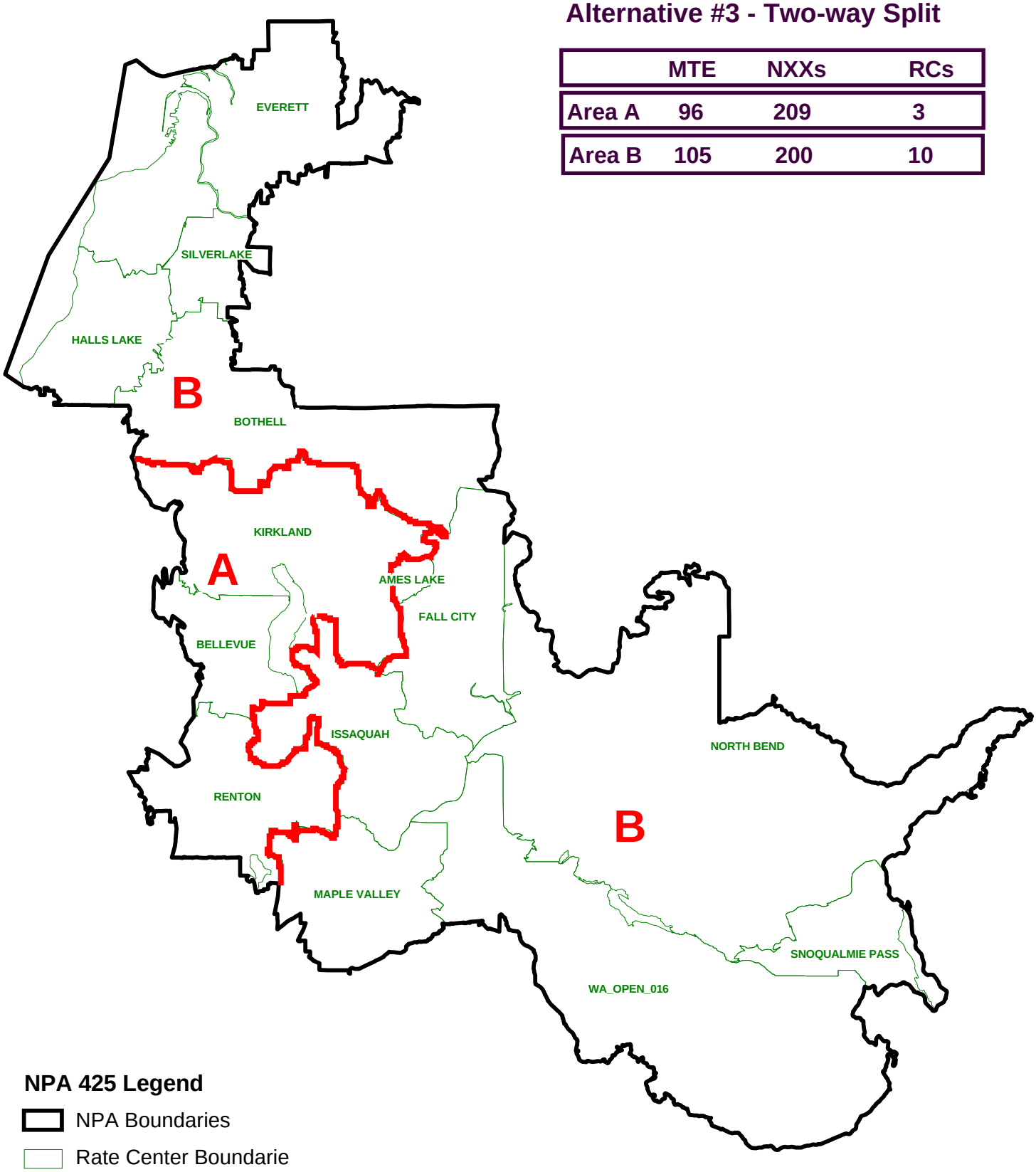
- NPA Boundaries
- Rate Center Boundarie
- Proposed Split Line

Produced by CDS Business Mapping 11/05/99

NPA 425 Rate Center Map

Alternative #3 - Two-way Split

	MTE	NXXs	RCs
Area A	96	209	3
Area B	105	200	10



NPA 425 Legend

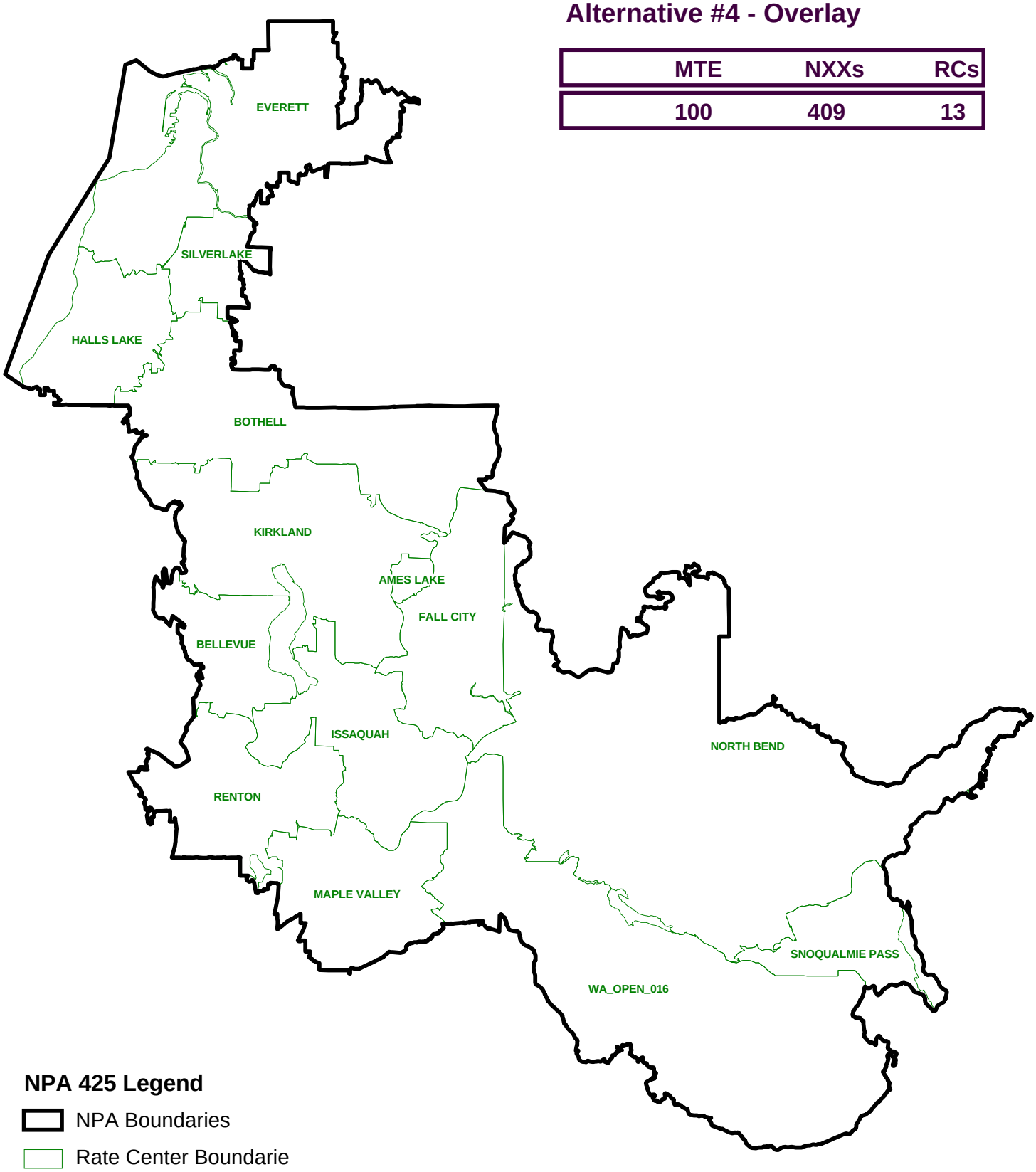
- NPA Boundaries
- Rate Center Boundarie
- Proposed Split Line

Produced by CDS Business Mapping 11/05/99

NPA 425 Rate Center Map

Alternative #4 - Overlay

MTE	NXXs	RCs
100	409	13



NPA 425 Legend

- NPA Boundaries
- Rate Center Boundarie

Produced by CDS Business Mapping 11/05/99

TAB 6

Lockheed Martin IMS
Communications Industry Services
1120 Vermont Avenue N.W. Washington, D.C. 20005

November 22, 1999

To: 206 NPA and 425 NPA Code Holders & Other Industry Members (Washington)

Re: Notice of 206 NPA and 425 NPA Relief Planning Meetings (1/5/2000 and 1/6/2000)

This is to notify you that Lockheed Martin IMS, North American Numbering Plan Administration (NANPA), in its role as NPA relief planner and in accordance with the NPA Code Relief Planning and Notification Guidelines, INC 97-0404-016, has scheduled two consecutive area code relief planning meetings to provide the industry an opportunity to develop relief plans for the 206 area code and the 425 area code. The 206 area code in the State of Washington is currently projected to exhaust in the 2nd Quarter 2002. The 425 area code in the State of Washington is currently projected to exhaust 4th Quarter 2003. Even though this exhaust date is approximately one year later, the Washington Utilities and Transportation Commission Staff has requested NANPA to address relief planning for the 425 NPA coincidentally with the 206 NPA.

The Initial Planning Documents (IPD) for these two NPAs are scheduled for distribution on or before December 8, 1999. The IPDs will be the starting point for the industry relief planning meeting being held January 5-6, 2000 in Bellevue, Washington (details below). Any initial industry input prior to generating the IPD would be greatly appreciated.

Starting on January 5, NANPA will host an industry meeting to develop relief plans for the 206 and 425 area codes. This meeting will continue on January 6. The objective of this meeting is to agree on relief plans for these two area codes to be presented to the Washington Utilities and Transportation Commission. We will follow the consensus process, developed in an open industry forum, which is supported by the Alliance for Telecommunications Industry Solutions (ATIS). Please come prepared to make a decision.

Initial Planning Documents (IPD) presenting relief options for the Washington 206 and 425 area codes are currently being developed and will be distributed via email notification or fax on or before December 8. NANPA welcomes the submission of other relief alternatives from the industry. These will be included in the IPD distribution if they are submitted to me via e-mail by December 1. Additional alternatives will also be accepted during the meeting, although advance submission is recommended to allow entities time to review them in advance.

The initial NPA relief planning meetings will be held at the Airtouch Employee Development Center, 3600 136th Place, SE, Bellevue, Washington, 98006 on January 5-6, 2000 beginning promptly at 9:00 a.m. and continuing until 5 p.m. on both days. Specific directions to the meeting and an agenda are attached.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation in this meeting. Experience has demonstrated that this could be the only face-to-face meeting of the industry before a decision is reached on a recommended plan. If you plan to attend this meeting, please complete and return the enclosed Advanced Meeting Reservation Form to Elizabeth Fitzpatrick, NANPA by December 29, so we can accommodate everyone who wishes to attend.

Please call Joe Cocke (805-492-6327) or Bruce Armstrong (303-774-8915) if you have any questions or require additional information.

Bruce Armstrong
NPA Relief Planner – Western Region
Lockheed Martin NANPA
bruce.armstrong@nanpa.com

Enclosures

NANPA

206 and 425 NPA RELIEF INDUSTRY PLANNING MEETING
January 5-6, 2000
9:00 AM – 5:00 PM

AIRTOUCH
Employee Development Center
3600 136th Place SE
Bellevue, Washington

NANPA – NPA Relief Planner – Bruce Armstrong

Note: Decisions will be made that will affect the industry. If you cannot attend this meeting, please send a representative. We will seek to reach consensus on these issues. Please be prepared to vote on the issues. Additionally, since the WUTC staff requested that these two NPAs be discussed together, parties wishing to participate only in discussions pertaining to one NPA may want to attend both meetings.

--AGENDA TOPICS –

Wednesday, January 5, 2000

1. Introductions, Agenda Review	9:00 AM
2. Review Generic Information for Planning	
3. Status and Composition of 206 and 425 NPAs	
4. BREAK	10:30 AM
5. Communities of Interest	
6. Review Possible Relief Alternatives	
7. Lunch	12:00 PM
8. Additional Discussion of Alternatives	1:15 PM
9. Break	3:00 PM
10. Additional Discussion of Alternatives	
11. Break for Day	5:00 PM

Thursday, January 6, 2000

12. Additional Discussion of Alternatives (If Necessary)	9:00 AM
13. Develop Pros and Cons of Alternatives	

14. Break 10:30 AM

15. Set Three Place Dates: Permissive / Mandatory / End of Mandatory.

16. Lunch 11:30 AM

17. Final Filing Issues (Set Filing Date and Content and Review Date)

12. BREAK 2:30 PM

13. NANPA Feedback Survey

14. Open Discussion

15. Set Next Industry Meeting Date - if required

Lockheed Martin IMS
Communications Industry Services
1120 Vermont Avenue N.W. Washington, D.C. 20005

LOCKHEED MARTIN

November 29, 1999

To: All Washington 206, 425 and 253 NPA Code Holders and Interested Parties

Subject: Inclusion of Possible Discussion of 253 NPA in January 5-6 Relief Planning Meeting

It has come to my attention that the Staff of the Washington Utilities and Transportation Commission (WUTC) anticipates a possible discussion of the 253 NPA to be included with the 206 and 425 NPA Relief Planning Meeting to be held on January 5-6, 2000 in Bellevue. Therefore, this is to provide notice to those interested parties that the 253 NPA will be a subject for discussion at the meeting. Parties having an interest in the 235 NPA relief should attend the meeting. Any party wishing to present an alternative for NPA relief at this meeting may include the 253 NPA in such plan.

I look forward to an interesting meeting.

Bruce H. Armstrong
NANPA Area Code Relief Planning
303-774-8915
bruce.armstrong@nanpa.com

INDUSTRY CONSENSUS PROCESS

Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome or result. Substantial agreement means more than a simple majority, but not necessarily unanimity. Recommendations of all participants will be considered carefully and in good faith in seeking and in reaching consensus recommendations and resolutions.

The consensus process is to free from interest group dominance, requiring that all views and objections be considered. This requires that a concerted effort be made toward issue resolution. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection.

CLC Principles and Procedures May 1998
Section 6.8.8

Silence on the part of a participant when a resolution to an issue is proposed is considered to be agreement with the proposed resolution. Therefore, all participants are encouraged to articulate their concerns regarding proposed resolutions, and the leadership is expected to ensure that all participants are afforded an opportunity to voice their objections.

INC Administrative Guidelines INC 95-0127-005 Reissued January 1998
Consensus Process

THE 7 CRITERIA
To Compare Exhaust Relief Alternatives

1) Minimize end users' confusion. (2.4)

2) Balance the cost of implementation for all affected parties. (2.4)

3) Provide that customers who undergo number changes shall not be required to change again for a period of 8-10 years. (2.5 and 5.0f)

4) Not favor a particular interest group. (2.6)

5) Cover a period of at least 5 years beyond the predicted date of exhaust. (5.0a)

6) 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 in a difference in NPA lifetimes of more than 15 years, should be avoided. (5.0h)

7) Comply with state and federal statutes, rulings and orders.

Attributes of Geographic Splits and Overlays

Splits	Overlays
General Attributes of Splits	General Attributes of Overlays
• Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Future splits will reduce the geographic size of the area code.	• With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay. Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
• Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.	• An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
• Geographic splits permit 7 digit dialing within an area code.	• An overlay will require customers to dial 10 digits for all calls within the geographic area.
• Implementation is generally understood.	• Because the overlay is a new concept, it will require customer education..

206 NPA
MONTHLY NXX CODE GROWTH

	JAN.	FEB.	MAR.	APR.	MAY	JUN.	JUL.	AUG.	SEP.	OCT.	NOV.	DEC.	TOTAL
1998						27		9	5	4	13	4	62
1999	13	2	7	9	4	12	8	8	8	6	11		88

FORECASTED NXX EXHAUST BASED ON 1999 COCUS	2Q2002
TOTAL SPARE CODES AVAILABLE FOR ASSIGNMENT:	284
ANNUALIZED CO CODE DEMAND:	102

SOURCE: NANPA CO CODE ADMINISTRATION
PAULA HUSTEAD
TEL. NO. 925-363-8706

Rate Centers by LATA
LATA 672: 2
LATA 674: 14

Rate Centers
16

Note: June 1998 figure is the total number of assigned codes by U S WEST thru 6/30/98.
Note: August 1998 figure is the total number of assigned codes by U S WEST for July & August 1998.

Updated:
September 1, 1999

RATE CENTER TABLE

STATE:WA									
NPA:206									
LERG Date:12/1/99									
Count of NXX	CATEGORY								
RC FULL NAME	CAP	CLEC	ICO	L RESELLER	PCS	RBOC	WIRELESS	(blank)	Grand Total
BAINBRIDGE ISLAND	1	7				3			11
DES MOINES	1	5				4			10
RICHMOND BEACH	1	5	3						9
SEATTLE	24	73	2	4	17	225	130		475
VASHON		2	2						4
(blank)									
Grand Total	27	92	7	4	17	232	130		509

Source: Local Exchange Routing Guide

CODE HOLDER TABLE

STATE:WA									
NPA:206									
LERG Date:12/1/99									
Count of NXX	CATEGORY								
OCN_NAME	CAP	CLEC	ICO	L RESELLER	PCS	RBOC	WIRELESS	(blank)	Grand Total
ADVANCED TELCOM GROUP, INC. - WA		1							1
ADVANCED TELECOMM INC DBA CADY TELEMENAGEMENT INC				1					1
AIRTOUCH PAGING - WASHINGTON							5		5
ALLEGIANCE TELECOM OF WASHINGTON, INC.		1							1
AT&T LOCAL		3							3
AT&T WIRELESS SERVICES, INC.							31		31
CCCWA INC. DBA CONNECT - WA		5							5
CENTURYTEL OF WASHINGTON, INC.			2						2
ELECTRIC LIGHTWAVE, INC. - WASHINGTON		7							7
FOCAL COMMUNICATIONS CORPORATION OF WASHINGTON		1							1
FOX COMMUNICATIONS CORPORATION		2							2
FRONTIER LOCAL SERVICES, INC. - WA		8							8
GOLD TEL CORPORATION				1					1
GREAT WEST SERVICES, LTD. - WA		1							1
GST LIGHTWAVE, INC. - WASHINGTON		6							6
GTE MOBILNET OF THE SOUTHEAST - GEORGIA							3		3
GTE NORTHWEST INCORPORATED - WA		2							2
GTE NORTHWEST, INC. - WASHINGTON			5						5
ICG TELECOM GROUP - WA		1							1
INTERNATIONAL TELCOM, LTD. - WA		30							30
LEVEL 3 COMMUNICATIONS, LLC - WA		1							1
MARATHON COMMUNICATIONS, INC				2					2
MCIMETRO, ATS, INC.		9							9
METROCALL							9		9
NEXTEL COMMUNICATIONS							8		8
NEXTLINK LLC - WA	12								12
PAC - WEST TELECOMM, INC.		4							4
PAGENET							14		14
PDGT, COM. INC.		1							1
PREFERRED NETWORKS, INC.							1		1
SPRINT COMMUNICATIONS COMPANY, L.P. - WA		3							3
SPRINT SPECTRUM L.P.					17				17
TELEPORT COMMUNICATIONS GROUP - SEATTLE	15								15
TELIGENT, INC. - WA		1							1
THE WESTLINK COMPANY							9		9
US WEST COMMUNICATIONS - PACIFIC NWEST BELL						232			232
US WEST COMMUNICATIONS, INC.							6		6
US WEST NEW VECTOR GRP INC. DBA AIRTOUCH CELL							37		37
VOICESTREAM WIRELESS CORPORATION							7		7
WINSTAR WIRELESS, INC. - WA		1							1
WORLDCOM TECHNOLOGIES, INC. - WA		4							4
(blank)									
Grand Total	27	92	7	4	17	232	130		509

Source: Local Exchange Routing Guide

425 NPA
MONTHLY NXX CODE GROWTH

	JAN.	FEB.	MAR.	APR.	MAY	JUN.	JUL.	AUG.	SEP.	OCT.	NOV.	DEC.	TOTAL
1998						30		7	6	7	14	4	68
1999	14	0	9	18	2	10	34	15	4	3	14		123

FORECASTED NXX EXHAUST BASED ON 1999 COCUS	4Q2003
TOTAL SPARE CODES AVAILABLE FOR ASSIGNMENT:	366
ANNUALIZED CO CODE DEMAND:	97

SOURCE: NANPA CO CODE ADMINISTRATION
PAULA HUSTEAD
TEL. NO. 925-363-8706

Rate Centers
13

Note: June 1998 figure is the total number of assigned codes by U S WEST thru 6/30/98.
Note: August 1998 figure is the total number of assigned codes by U S WEST for July & August 1998.

Updated:
September 1, 1999

RATE CENTER TABLE

STATE:WA									
NPA:425									
LERG Date:12/1/99									
Count of NXX	CATEGORY								
RC FULL NAME	CAP	CLEC	ICO	L RESELLER	PCS	RBOC	WIRELESS	(blank)	Grand Total
AMES LAKE			1						1
BELLEVUE	7	35	1		6	35	25		109
BOTHELL	2	11	16				3		32
EVERETT	1	15	38	1	5		28		88
FALL CITY			2						2
HALLS LAKE	1	10	18				4		33
ISSAQUAH	1	9				7			17
KIRKLAND	3	12	39						54
MAPLE VALLEY	1	7				2			10
NORTH BEND			4						4
RENTON	10	15				22			47
SILVERLAKE	1	5	6						12
SNOQUALMIE PASS			1						1
(blank)									
Grand Total	27	119	126	1	11	66	60		410

Source: Local Exchange Routing Guide

CODE HOLDER TABLE

STATE:WA									
NPA:425									
LERG Date:12/1/99									
Count of NXX	CATEGORY								
OCN_NAME	CAP	CLEC	ICO	L RESELLER	PCS	RBOC	WIRELESS	(blank)	Grand Total
ALLEGIANCE TELECOM OF WASHINGTON, INC.		2							2
AT&T LOCAL		7							7
AT&T WIRELESS SERVICES, INC.							12		12
CENTURYTEL OF WASHINGTON, INC.			8						8
ELECTRIC LIGHTWAVE, INC. - WASHINGTON		28							28
FOCAL COMMUNICATIONS CORPORATION OF WASHINGTON		6							6
FOX COMMUNICATIONS CORPORATION		4							4
FRONTIER LOCAL SERVICES, INC. - WA		12							12
GOLD TEL CORPORATION				1					1
GREAT WEST SERVICES, LTD. - WA		2							2
GST LIGHTWAVE, INC. - WASHINGTON		9							9
GTE MOBILNET OF THE SOUTHEAST - GEORGIA							4		4
GTE NORTHWEST INCORPORATED - WA		2							2
GTE NORTHWEST, INC. - WASHINGTON			118						118
INTERNATIONAL TELCOM, LTD. - WA		12							12
LEVEL 3 COMMUNICATIONS, LLC - WA		2							2
MCIMETRO, ATS, INC.		9							9
MOBILEMEDIA COMMUNICATIONS, INC. - CALIFORNIA							1		1
NEXTEL COMMUNICATIONS							5		5
NEXTLINK LLC - WA	12								12
PAC - WEST TELECOMM, INC.		9							9
PAGENET							1		1
PDGT, COM. INC.		1							1
PREFERRED NETWORKS, INC.							1		1
SPRINT COMMUNICATIONS COMPANY, L.P. - WA		4							4
SPRINT SPECTRUM L.P.					11				11
TELEPORT COMMUNICATIONS GROUP - SEATTLE	15								15
TELIGENT, INC. - WA		3							3
THE WESTLINK COMPANY							1		1
US WEST COMMUNICATIONS - PACIFIC NWEST BELL						66			66
US WEST COMMUNICATIONS, INC.							5		5
US WEST NEW VECTOR GRP INC. DBA AIRTOUCH CELL							16		16
VOICESTREAM WIRELESS CORPORATION							14		14
WINSTAR WIRELESS, INC. - WA		2							2
WORLDCOM TECHNOLOGIES, INC. - WA		5							5
(blank)									
Grand Total	27	119	126	1	11	66	60		410

Source: Local Exchange Routing Guide