



August 4, 2000

Mr. Glenn Blackmon  
Assistant Director – Telecommunications  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
PO Box 47250  
Olympia, WA 98504-7250

Re: Request for Additional 509 NPA Relief Alternative Analysis

Dear Glenn:

In response to your request that NANPA analyze additional relief alternatives developed by WUTC, the result of that analysis is described below. Also, maps of each of these three alternatives are attached for your information.

As you know, the alternative you submitted titled "Option B" is identical to the relief alternative (#10) which NANPA developed and presented for industry consideration at the relief planning meeting held on April 27, 2000 in Bellevue. At that time the industry considered and rejected this relief alternative. "Option A" and "Option C" are variations of Option B, each dividing the remainder of the 509 NPA into two sections, and including the greater Spokane area with either the north section or the south section.

The projected lives of these relief alternatives were developed using the same model as the other relief alternatives developed for the industry's relief planning meeting, so that you can accurately compare these alternatives to those considered during that meeting. Bear in mind that since that meeting the industry has submitted a new COCUS which indicates the 509 NPA will exhaust sooner than had been projected under the COCUS in place at that time.

Only Option B (Alternative 10) meets industry guidelines for the assignment of a relief NPA. Option A, which includes the greater Spokane area with the southern section, falls significantly outside industry guidelines, both in terms of minimum life, and disparity of projected lives between the two resulting NPAs. Option C, which includes the greater Spokane area with the northern section falls below industry guidelines on the minimum life criteria, with Area A having a projected life of less than 5 years. As you know, the risk of a state commission approving a relief plan which falls outside the industry guidelines is that NANPA may be precluded from issuing a relief NPA without first obtaining approval from the Industry Numbering Committee (INC), which could delay the implementation of relief.

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Phone 202 533 2600  
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For ease of reference, I have continued to refer to these relief alternatives as Options A, B and C as you submitted them to NANPA. Generally, however, all relief alternatives considered by the industry are numbered sequentially so that they may be tracked throughout the relief planning process.

OPTION A

Option A divides the current 509 NPA into two sections -- Area A (north) and Area B (south). Area A has 50 rate centers, and Area B has 91 rate centers. The greater Spokane area is included in Area B. Area B contains all of the major population centers in the 509 NPA, including Spokane, Yakima and the University of Washington. As a result, while Area A has a projected life of 24 years, Area B has a projected life of only 2 3/4 years, well below the industry guideline requiring a projected life of "at least" 5 years.

**OPTION A (2-Way Geographic Split)**

<b>Single Phase Relief Plan</b>	<b>Projected Life</b>
Area A (north)	24 Years
Area B (south, including greater Spokane)	< 3 Years

OPTION B

Option B, which is the same as Alternative 10 developed by NANPA and presented to the industry for consideration, divides the current 509 NPA into two sections -- Area A consisting of the 124 rate areas outside the Spokane area, and Area B consisting of the 17 rate centers in and around Spokane. Option B meets industry guidelines provided that the 509 NPA is retained in Area B. If the 509 NPA were retained in Area A, the projected life of Area B, which changes to the new NPA, is less than the 8-10 years prescribed by the INC Guidelines.

**OPTION B (2-Way Geographic Split)**

<b>Single Phase Relief Plan</b>	<b>Projected Life</b>
Area A (509 NPA less greater Spokane)	12 Years
Area B (Greater Spokane area)	5 Years

OPTION C

Option C is similar to Option A in that it divides the 509 NPA into northern and southern sections, this time including the greater Spokane area in the northern section. Area A has 67 rate areas, and Area B has 74 rate areas. The greater Spokane area is included in Area A. This option divides some of the area's population centers, and as a result comes closer to meeting industry guidelines, although it fails to satisfy the requirement of "at least" 5 years projected life.

**OPTION C (2-Way Geographic Split)**

<b>Single Phase Relief Plan</b>	<b>Projected Life</b>
Area A (north, including greater Spokane)	4 Years
Area B (south)	14 Years

Maps representing each of these three Options are attached for your information.

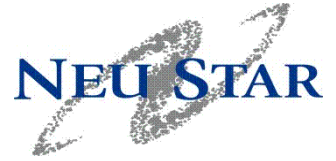
If you have any questions, please feel to call me at (562) 436-6524.

Dan H. Burcham  
NPA Relief Planner - Western Region  
NeuStar NANPA

Attachments

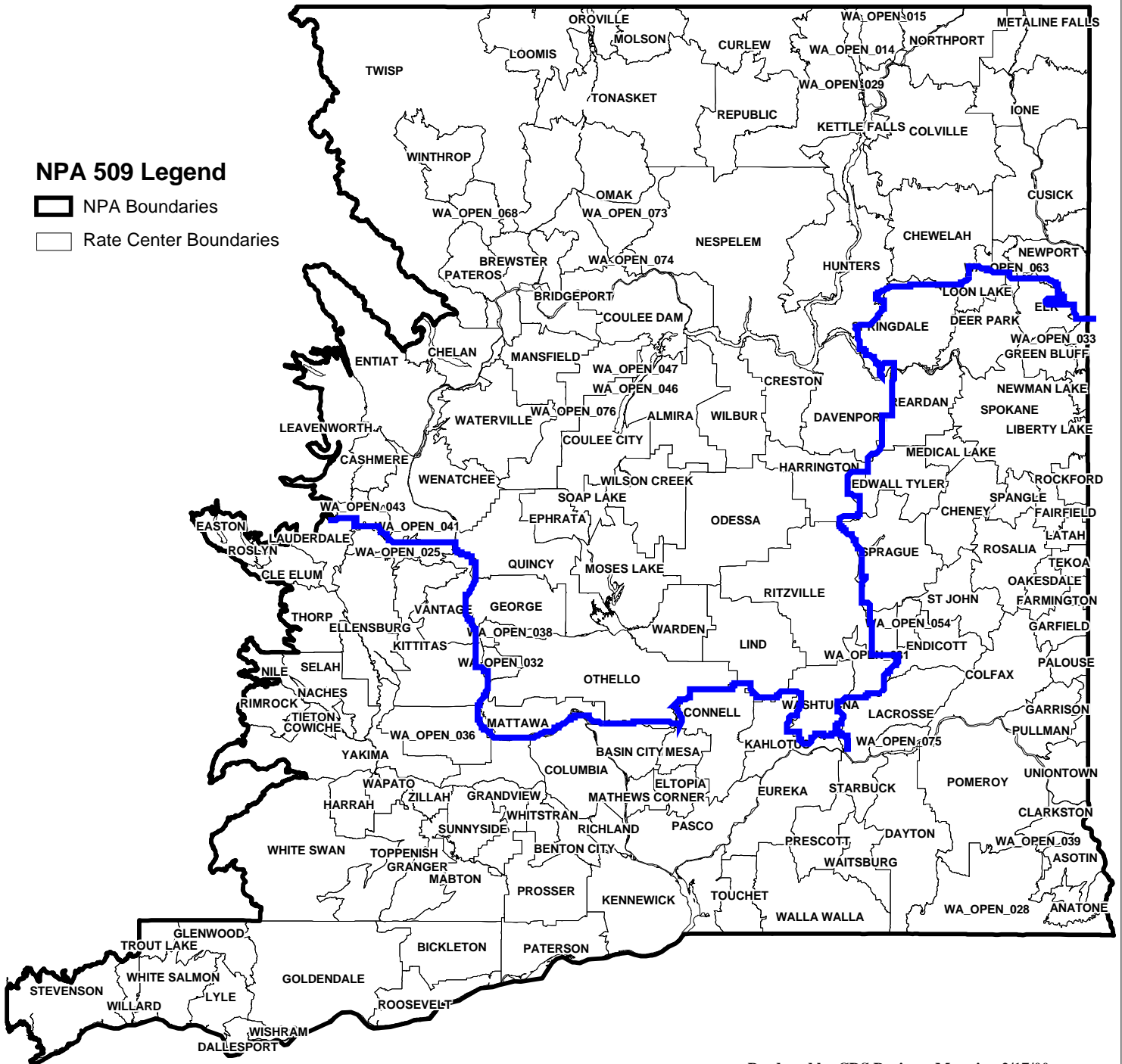
cc: David Griffith; WUTC  
509 NPA Industry Planning Team

# NPA 509 Rate Center Map

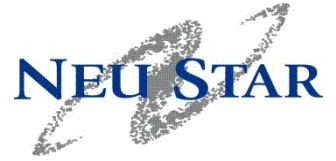


## NPA 509 Legend

- NPA Boundaries
- Rate Center Boundaries

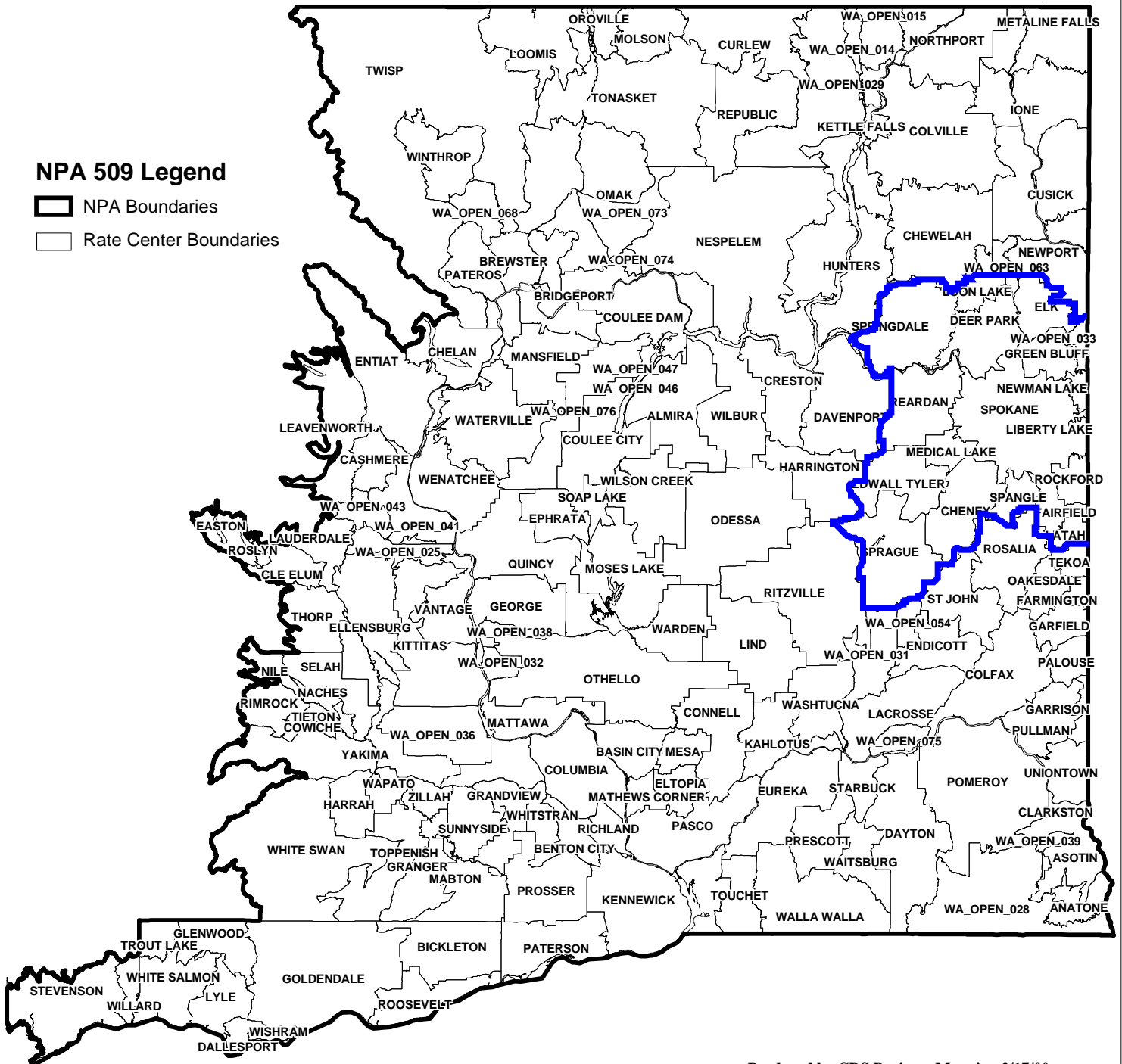


# NPA 509 Rate Center Map

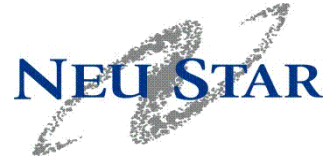


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