



June 16, 2020

Ms. Brinda Westbrook-Sedgwick, Commission Secretary
Public Service Commission of the District of Columbia
1325 G Street, N.W.
Suite 800
Washington, D.C, 20005

Re: Implementation of Relief for the 202 Area Code

Dear Ms. Westbrook-Sedgwick:

Enclosed please find the North American Numbering Plan Administrator's Petition, on behalf of the District of Columbia Telecommunications Industry for the matter regarding the Implementation of Relief for the 202 Area Code.

Please feel free to contact me if you have any questions regarding this matter.

Thank you,

Kimberly Miller

Kimberly Miller
Senior Corporate Counsel
Somos, Inc.

Enclosures

cc: All Parties of Record

In the Matter of the)
Implementation of Relief for the) **Docket No.** _____
202 Area Code)

The North American Numbering Plan Administrator (“NANPA”), as the neutral third party numbering plan area relief planner for the District of Columbia (“DC”) and on behalf of the DC telecommunications industry (“Industry”),¹ requests that the Public Service Commission of the District of Columbia (“Commission”)² approve an all-services overlay for relief for the 202 numbering plan area (“NPA”).³ Absent NPA relief, the supply of central office codes (often referred to as “CO” or “NXX” codes) in the 202 NPA is currently projected to exhaust during the third quarter of 2022. In order for relief to be implemented before CO code exhaust occurs in the 202 NPA, the Industry requests that the Commission issue an order no later than the 4th Quarter 2020, approving a 13-month implementation schedule. Adhering to this schedule will allow the new NPA to be implemented six-months prior to the projected exhaust of the 202 NPA as required by Industry guidelines.

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

I. BACKGROUND

The District of Columbia covers a total area of 68.34 square miles, and is bordered by Montgomery County, Maryland to the northwest; Prince George's County, Maryland to the east; Arlington County and Alexandria, Virginia to the west. There is only one city, Washington, founded in 1791 as the national capital, which is served by one rate center, the Washington Zone 1 rate center. The 202 NPA was the original NPA which served the same area, implemented in 1947.

In October 2019, NANPA published its semi-annual NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis ("October 2019 NRUF Report") which indicated that the 202 NPA would exhaust during the first quarter of 2023. An updated forecast was issued on March 12, 2020 changing the forecasted exhaust to the third quarter of 2022 due to increased demand.⁴ Based upon the projected exhaust, NANPA convened⁵ an Industry relief meeting via conference call on May 27, 2020.⁶ Because the 202 NPA consists of a single rate center, NANPA determined the only relief alternative which will meet Industry guidelines is an overlay.⁷ As such, the NPA Code Relief Planning Guidelines direct NANPA

⁴ October 2019 NRUF and NPA Exhaust Analysis ("October 2019 NRUF Report") and the Changes as of March 12, 2020.

⁵ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Oct. 26, 2018) ("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 Planning Guidelines can be accessed on the ATIS website. NANPA is responsible for initiating area code relief in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically 36 months prior to exhaust. NPA Relief Planning Guidelines at §5.0.

⁶ A copy of the May 27, 2020 meeting minutes is attached as Exhibit A.

⁷ NPA boundaries must follow rate center boundaries. NPA Relief Planning Guidelines at §2.11.

to draft a petition requesting an overlay for relief.⁸ Accordingly, NANPA distributed a notice to the Industry containing a draft relief petition prior to the Industry relief meeting.⁹

II. DESCRIPTION OF THE RELIEF OPTION

The all-services overlay would superimpose a new NPA over the same geographic area covered by the existing 202 NPA and is projected to last approximately 51 years. CO codes from the new overlay area code can be assigned upon the in-service date of the new NPA, although all assignable CO codes from the 202 NPA should be exhausted before assignments are made in the new overlay area code. All existing customers would retain their 202 area code and would not have to change their telephone numbers. All local calls within and between the 202 NPA and the new NPA would be dialed using 10 digits.¹⁰ The new dialing plan would be implemented with the new overlay relief plan. The dialing plan is set forth in the table below:

Dialing Plan for the All-Services Overlay		
Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 permissive dialing at service provider discretion

⁸ “Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan petition requesting approval of the overlay....” NPA Code Relief Planning and Notification Guidelines at §5.6.2.

⁹ NANPA’s March 31, 2020 notice to the Industry is attached as Exhibit B and contains CO Code assignment information, thousands-block pooling statistics, and maps of the overlay.

¹⁰ 47 C.F.R. §52.19(c)(3)(ii).

Industry participants at the May 27, 2020 relief planning meeting reached consensus to recommend to the Commission a 13 month schedule for implementing the all-services overlay. The recommended schedule, provided below, sets forth time periods for implementation events but does not include specific dates. The Commission should allow the Industry to select the specific implementation dates, once an order is issued, that do not interfere with certain holidays or conflict with other overlay implementations occurring across the country.

Recommended Implementation Schedule for an All-Services Overlay

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Dialing and Customer Education Period <i>(Calls within 202 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months (end of permissive should be six months prior to exhaust – 1Q 2022)
Earliest Activation of CO codes in the new NPA after end of Permissive Dialing Period <i>(Effective date for codes from the new NPA)</i>	1 month
Total Implementation Interval	13 months

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

III. CONCLUSION

The Industry respectfully requests that the Commission issue an order no later than the fourth quarter 2020, approving the all-services overlay relief plan for the 202 area code. The Industry also requests that the order approve the recommended 13-month implementation schedule as set forth herein to ensure timely implementation of relief and effective customer education.

Respectfully submitted,

Kimberly Miller

Kimberly Wheeler Miller

Counsel for
North American Numbering Plan Administrator

2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
844-Hi-Kimberly or 844-445-4623
kmiller@somos.com
DC Bar No. 461060

Beth Sprague
NANPA Director
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
571-363-3821
bsprague@somos.com

June 16, 2020

VERIFICATION

I, Beth Sprague, hereby declare under penalty of perjury that the facts in the foregoing **Petition of the North American Numbering Plan Administrator** are true and correct or are true and correct to the best of my knowledge, information and belief.

Date: June 16, 2020

Beth Sprague

Beth Sprague
NANPA Director
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
571-363-3821
bsprague@somos.com

Exhibit A
May 27, 2020 Relief Planning
Meeting Minutes

June 5, 2020

To: All 202 NPA Code Holders and Interested Industry
Members

Subject: Final Minutes of the Initial Relief Planning
Meeting for the District of Columbia 202 NPA

Attached are the final minutes from the May 27, 2020 initial relief planning meeting for the District of Columbia 202 NPA. No edits were received to the draft minutes sent out on May 29, 2020.

If you have any questions, please give me a call at (571) 363-3821 or via email at bsprague@somos.com.

Sincerely,
Beth Sprague

CC: Lara Walt – Senior Attorney Advisor
Public Service Commission of the District of Columbia

**District of Columbia 202 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL – FINAL MINUTES
May 27, 2020**

WELCOME, INTRODUCTIONS & REVIEW CONSENSUS PROCESS

Beth Sprague, North American Numbering Plan Administrator (NANPA) Director, welcomed the participants to the meeting. A list of attendees can be found in Attachment #1. The objective of the meeting was to review and approve the draft relief petition for the District of Columbia (D.C.) 202 NPA for the industry to recommend to the Public Service Commission (PSC). The ATIS (Alliance for Telecommunications Solutions) consensus process was then reviewed.

NANPA'S ROLE AND RESPONSIBILITIES

The NANPA responsibilities were reviewed and are:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA.
- Distribute the notice with draft petition for approval two months in advance of a conference call scheduled to review and approve the draft petition. (March 31, 2020). The two month timeframe is required under Section 5.6.2 of the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, dated October 26, 2018) where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the Guidelines.
- The main objective is achieved by reaching consensus on the draft petition to recommend to the District of Columbia Public Utilities Commission.
- Also determine any additional items to include in a filing with the D.C. PSC such as implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition on behalf of the industry with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of the meeting (July 8, 2020).

**REVIEW INDUSTRY NUMBERING COMMITTEE (INC) GUIDELINES
SECTION 5.6.2**

The remainder of Sec. 5.6.2 was reviewed as follows:

Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all affected parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g. an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

For the 202 NPA, there is only one Rate Center, WASHINGTON ZONE 1 (WSHNGTNZN1), and therefore are no split options that can be developed. NANPA has determined that only the overlay alternative will meet the guidelines.

REVIEW OF THE 202 NPA BACKGROUND AND FORECASTED EXHAUST

Beth reviewed the 202 background and forecasted exhaust. The October 2019 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“2019 NRUF Report”), published by NANPA, indicated the 202 NPA will exhaust during the second quarter of 2023. A Delta NRUF forecast was issued on March 12, 2020 changing the forecasted exhaust to the third quarter of 2022, based on increased demand. The proposed all-services overlay would superimpose a new NPA over the same geographic area covered by the existing 202 NPA and is projected to last approximately 51 years. See Attachment #2.

STATUS OF THE 202 NPA

An updated read-out of the status and monthly CO code assignment activity for the D.C. 202 was provided. As of May 26, 2020, the 202 NPA has 753 codes assigned, 29 codes available for assignment and 18 Unavailable codes. 17 codes have been assigned in 2020: 5 in January, 2 in February, 7 in March, 0 in April, and 3 in May. See Attachment #3.

STATUS OF THOUSANDS-BLOCK POOLING IN THE 202 NPA

Cecilia McCabe, Pooling Implementation Manager, provided an updated read-out of the status of thousands-block pooling. Cecilia stated number pooling started in the 202 NPA on April 2, 2002. Pooling in the Washington Zone 1 rate center is

mandatory. From May 1, 2019 through May 26, 2020, there were 302 blocks assigned and 8 blocks are available as of May 26, 2020. For the same period, Pooling has assigned 27 codes; 25 for pool replenishment, none for dedicated customers and 2 for LRNs. The forecasted need for codes for the next 12 months is 14 codes for pool replenishment and dedicated customers and none for LRNs. See Attachment #4.

REVIEW OF THE DRAFT PETITION FOR THE 202 NPA

Beth reviewed the draft relief petition for the 202 NPA, which recommends the all-services overlay to superimpose a new NPA over the same geographic area covered by the existing 202 NPA and is projected to last approximately 51 years. CO codes from the 202 NPA should be exhausted before assignments are made in the new overlay area code. All existing customers would retain their 202 area code and would not have to change their telephone numbers. All local calls within and between the 202 NPA code would be dialed using 10 digits. The projected life is approximately 51 years. Consensus was reached to approve the recommended petition with the addition of the 13-month timeline implementation schedule and the revision of the items listed on the implementation timeframe diagram as shown in Attachment #5.

CONSENSUS ON IMPLEMENTATION INTERVALS

Consensus was reached during review of the draft petition to recommend to the Commission a 13-month schedule for implementation of the overlay with the new NPA effective 6-months prior to the forecasted exhaust.

Intervals for the recommended Overlay:

Recommended Implementation Schedule for an All-Services Overlay

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Dialing and Customer Education Period <i>(Calls within 202 NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months (end of permissive should be six months prior to exhaust – 1Q 2022)
Earliest Activation of CO codes in the new NPA after end of Permissive Dialing Period <i>(Effective date for codes from the new NPA)</i>	1 month
Total Implementation Interval	13 months

REVIEW OF DRAFT MEETING MINUTES & COMMISSION FILING

NANPA noted that the aim will be to distribute the minutes by May 29 in order to receive comments and corrections back to Beth Sprague via bsprague@somos.com in order for Beth to finalize the minutes by June 5. The reason for the shortened timeframe is to potentially submit the petition to the D.C. PSC as soon as possible given the requested turnaround time by 4th quarter of 2020. There were no objections stated to the proposed timing.

Adjourn

**D.C. 202 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
May 27, 2020
Participants**

NAME	COMPANY
Sharon Poer	AT&T
Rita Schmitz	Centurylink
Lara Walt	District of Columbia Public Service Commission
Beth Sprague	NANPA
Heidi Wayman	NANPA
Al Cipparone	NANPA
Cecilia McCabe	Pooling Implementation
Linda Hymans	Pooling Regulatory
Shaunna Forshee	Sprint
Karen Riepenkroger	Sprint
Rebecca Jefferson	T-Mobile
Laura Dalton	Verizon
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless

202 NPA Background Information

Relief Planning Background and Assumptions:

The District of Columbia covers a total area of 68.34 square miles, and is bordered by Montgomery County, Maryland to the northwest; Prince George's County, Maryland to the east; Arlington County, Virginia to the south; and Alexandria, Virginia to the west. There is only one city, Washington, founded in 1791 as the national capital, which is served by one rate center, the Washington Zone 1 rate center. The 202 NPA was the original NPA which served the same area, implemented in 1947.

CO Code Summary:

As of March 27, 2020, the 202 NPA has 747 codes assigned, 34 codes available for assignment and 19 Un-Assignable codes. There are 49 service provider OCNs that are code holders in the 202 NPA and 4 service provider OCNs that are only thousand-block holders.

CO Code Assignment History:

There were 11 codes assigned in 2020, 17 assigned in 2019, 13 assigned in 2018, 7 assigned in 2017, 13 assigned in 2016 and 21 assigned in 2015.

Exhaust Forecast:

The October 2019 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis ("2019 NRUF Report"), published by NANPA, indicates the 202 NPA will exhaust during the second quarter of 2023. A Delta forecast was issued on March 12, 2020 changing the forecasted exhaust to the third quarter of 2022, based on increased demand.

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 202 NPA

NRUF Date:	October 2019
Projected Exhaust Date:	3Q2022
Annualized CO Code Demand Projection	15.37
Monthly CO Code Demand Projection	1.28
NXX Assignment Data	March 2020
Relief Recommendation	All Services overlay

All existing customers would retain their 202 area code and would not have to change their telephone numbers. All local calls within and between the 202 NPA and the new NPA would be

dialed using 10 digits.¹ The new dialing plan would be implemented with the new overlay relief plan. The dialing plan is set forth in the following table:

Dialing Plan for the All-Services Overlay

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at each service provider's discretion

¹ 47 C.F.R. §52.19(c)(3)(ii).

District of Columbia
NPA 202 Summary
May 27, 2020

<u>NPA</u>	<u>202</u>				
Assigned NXXs	753				
Protected NXXs	0				
Reserved NXXs	0				
Unavailable NXXs	18				
Available NXXs	29				
Total	800	800			
Assignment History					
2015	21				
2016	13				
2017	7				
2018	13				
2019	17				
2020	17				
* As of 5-26-2020	Jan 20	Feb 20	Mar 20	April 20	May 20*
	5	2	7	0	3
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958,959, 555, time), N11 and other unique codes (e.g., 976, 950), and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary)					

<i>POOLING STATISTICS</i>	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	DC 202
MEETING DATE:	5/27/20
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	4/2/02
RATE CENTERS	
<i># Total</i>	1
<i># Mandatory</i>	1
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	302
<i>(For time period 5/01/19 - 5/26/20)</i>	
BLOCKS AVAILABLE	
<i># Total</i>	8
<i>(As of preparation date: 5/26/20)</i>	
CODES ASSIGNED	
<i># Total</i>	27
<i># for Pool Replenishment</i>	25
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	2
<i>(For time period 5/01/19 - 5/26/20)</i>	
CODES FORECASTED	
<i># Total</i>	14
<i># for Pool Replenishment and Dedicated Customers</i>	14
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 5/26/20)</i>	

Exhibit B
Industry Notice

April 1, 2020

To: All 202 NPA Code Holders and Interested Industry Members

Subject: District of Columbia (202) Draft Petition Review – Time Correction

below

The North American Numbering Plan Administrator (NANPA) has scheduled an area code relief planning meeting via conference call to provide the industry an opportunity to review and approve a draft petition to approve an all-services overlay for relief for the 202 NPA which is projected to exhaust 3Q2022. According to the ATIS INC NPA Code Relief Planning and Notification Guidelines, Section 5.6.2 NANPA is to prepare a draft petition for industry review.

Accordingly, on May 27, 2020, NANPA will convene an industry NPA relief planning conference call to review and approve the draft relief petition for the 202 NPA. Included with the petition is an agenda along with the consensus process, a meeting aid with the above mentioned INC Guideline section 5.6.2, CO code summary and Pooling statistics reports, Service Provider CO code assignments for each NPA by OCN, and related rate center map.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation in the relief planning meeting. Past experience demonstrates that this could be the only meeting of the industry before a decision is reached on the petition that will be submitted to the Public Service Commission of the District of Columbia for approval. The details of the relief planning conference call are as follows:

Date: May 27, 2020

Time: 2:00pm Eastern; 1:00pm Central; 12:00pm Mountain; 11:00am Pacific

Bridge: (630) 827-6799 or (866) 846-1053

Passcode: 8831535#

NANPA is also making an online capability available for this meeting. To view the documents being presented during the call, please use this link:

<https://somos.my.webex.com/somos.my/j.php?MTID=m36e3a83fa651d129bfec0e6f0c5da84b>

Meeting number (access code): 622 529 674

Meeting password: Ty3mBKC3Uu4

PLEASE NOTE: Only use the dial-in number provided in this notice to hear the audio portion of the conference call. The number listed on the WebEx™ will not be available.

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning conference call. If you receive this notice from someone else and would like to receive additional information in the future about the 202 NPA relief, you are encouraged to sign up to NANPA's NAS-NNS by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (571) 363-3821 or via email at bsprague@somos.com.

Sincerely,

Beth Sprague
NANPA Director

CC: Lara Walt – Senior Attorney Advisor
Public Service Commission of the District of Columbia

**D.C. 202 NPA INITIAL RELIEF
PLANNING MEETING
VIA CONFERENCE CALL**

May 27, 2020 - 2:00 PM (ET)

AGENDA

Welcome, Introductions & Review Consensus Process

NANPA's Role and Responsibilities

Review INC Guidelines for Subsequent Overlay

Review of 202 NPA Background, History and Status

Review of the Draft Petition

Consensus on Implementation Intervals

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

AUGUST/23/2018

ATIS OPERATING PROCEDURES

VERSION 5.5

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion. A participant may appeal the resolution of an Issue in the manner provided for in Section 13.

Direct Petition for Overlay

This meeting aid has excerpts of the ATIS-0300061 NPA Code Relief Planning & Notification Guidelines regarding certain circumstances:

- 5.6.1 Where NPA relief is required for an existing overlay complex, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

NANPA shall notify all affected parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft petition. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

- 5.6.2 Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all affected parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g. an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

Direct Petition for Overlay

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local¹ and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

¹ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

District of Columbia
NPA 202 NXX Summary
Data as of 03/27/2020

[illegible]

<i>POOLING STATISTICS</i>	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	DC 202
MEETING DATE:	
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	4/2/02
RATE CENTERS	
<i># Total</i>	1
<i># Mandatory</i>	1
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	0
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	255
<i>(For time period</i>	
BLOCKS AVAILABLE	
<i>(As of prepar</i>	
CODES ASSIGNED	
<i># for Pool Replenishment</i>	20
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	3
<i>(For time period 4/01/19 - 3/30/20)</i>	
CODES FORECASTED	
<i># Total</i>	19
<i># for Pool Replenishment and Dedicated Customers</i>	19
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 3/30/20)</i>	

202 NPA Background Information

Relief Planning Background and Assumptions:

The District of Columbia covers a total area of 68.34 square miles, and is bordered by Montgomery County, Maryland to the northwest; Prince George's County, Maryland to the east; Arlington County, Virginia to the south; and Alexandria, Virginia to the west. There is only one city, Washington, founded in 1791 as the national capital, which is served by one rate center, the Washington Zone 1 rate center. The 202 NPA was the original NPA which served the same area, implemented in 1947.

CO Code Summary:

As of March 27, 2020, the 202 NPA has 747 codes assigned, 34 codes available for assignment and 19 Un-Assignable codes. There are 49 service provider OCNs that are code holders in the 202 NPA and 4 service provider OCNs that are only thousand-block holders.

CO Code Assignment History:

There were 11 codes assigned in 2020, 17 assigned in 2019, 13 assigned in 2018, 7 assigned in 2017, 13 assigned in 2016 and 21 assigned in 2015.

Exhaust Forecast:

The October 2019 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis ("2019 NRUF Report"), published by NANPA, indicates the 202 NPA will exhaust during the second quarter of 2023. A Delta forecast was issued on March 12, 2020 changing the forecasted exhaust to the third quarter of 2022, based on increased demand.

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 202 NPA

NRUF Date:	October 2019
Projected Exhaust Date:	3Q2022
Annualized CO Code Demand Projection	15.37
Monthly CO Code Demand Projection	1.28
NXX Assignment Data	March 2020
Relief Recommendation	All Services overlay

All existing customers would retain their 202 area code and would not have to change their telephone numbers. All local calls within and between the 202 NPA and the new NPA would be dialed using 10 digits.¹ The new dialing plan would be implemented with the new overlay relief plan. The dialing plan is set forth in the following table:

¹ 47 C.F.R. §52.19(c)(3)(ii).

Dialing Plan for the All-Services Overlay

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at each service provider's discretion

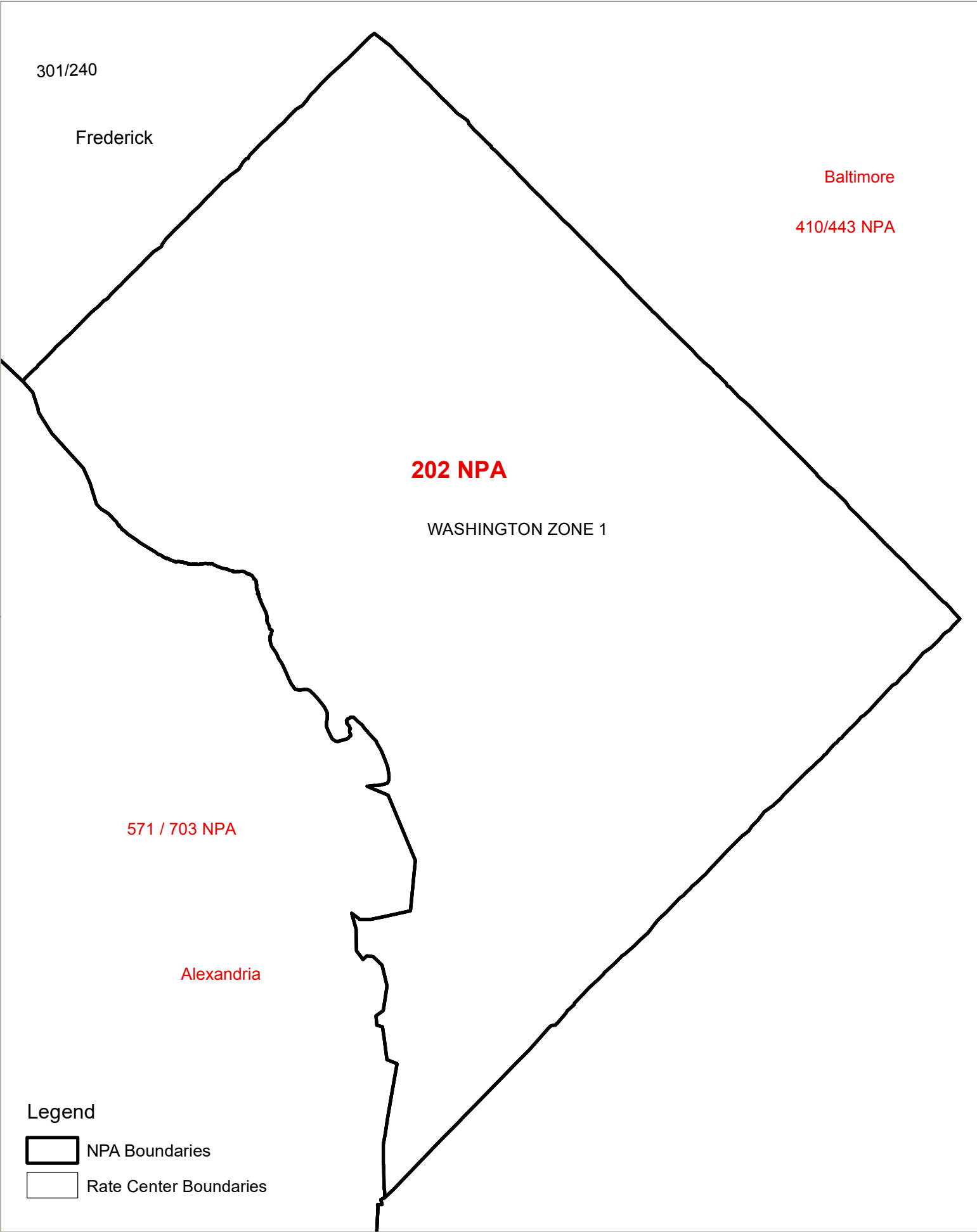
NPA 202 Code Holder List

Company	OCN	CountOfNXX
AIRESPRING, INC.	996H	1
AIRUS, INC. - DC	645H	3
ALLEGIANCE TELECOM OF THE DISTRICT OF COLUMBIA	4937	1
AT&T LOCAL	7421	2
ATLANTECH ONLINE, INC. - DC	513G	1
ATX TELECOMMUNICATIONS SERVICES, LTD-VA	1960	1
BANDWIDTH.COM CLEC, LLC - DC	074F	25
BARR TELL USA, INC. - DC	879H	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
BROADVIEW NETWORKS, INC. - DC	5977	3
BROADWING COMMUNICATIONS, LLC - DC	4093	4
CAVALIER EAST LLC - DC	4249	4
CAVALIER TELEPHONE, LLC	4725	2
CBeyond COMMUNICATIONS, LLC - DC	884E	1
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - DC	6402	85
CENTURYLINK COMMUNICATIONS LLC	7575	1
COMCAST PHONE OF DC, LLC - DC	6135	1
CTC COMMUNICATIONS CORP. - DC	2695	2
EXIANT COMMUNICATIONS LLC	114J	1
GLOBAL CROSSING TELEMAGEMENT, INC.-DC	4982	2
HD CARRIER LLC	321J	2
LEVEL 3 COMMUNICATIONS, LLC - DC	6117	14
LEVEL 3 TELECOM OF D.C., LLC - DC	2801	8
LOCAL ACCESS LLC - DC	118H	2
MCI WORLDCOM COMMUNICATIONS, INC. - DC	7445	5
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229	12
METRO PCS, INC.	5562	11
NEW CINGULAR WIRELESS PCS, LLC - DC	4036	52
OMNIPOINT COMMUNICATIONS CAP OPERATIONS, LLC	6855	29
ONVOY SPECTRUM, LLC	624H	1
ONVOY, LLC - DC	850D	19
PAETEC COMMUNICATIONS, INC. - DC	4989	6
PEERLESS NETWORK OF THE DISTRICT OF COLUMBIA, DC	275F	3
RCLEC, INC. - DC	408H	1
REDI-CALL COMMUNICATIONS CO	6810	1
SPRINT SPECTRUM L.P.	6664	49

STARPOWER COMMUNICATIONS, LLC - DC	8831	4
TELEPORT COMMUNICATIONS AMERICA, LLC - DC	7529	13
TELNYX LLC	073H	1
US LEC OF VIRGINIA, LLC - DC	2515	2
USA MOBILITY WIRELESS, INC.	6630	16
VERIZON WASHINGTON, DC INC.	9211	333
VOIPSTREET, INC.	597F	1
VONAGE NETWORK INC.	197D	3
VOXBEAM TELECOMMUNICATIONS INC. - DC	201H	1
WEST TELECOM SERVICES, LLC - DC	812C	1
WIDE VOICE, LLC - DC	538H	2
XO D.C., INC.	8964	13
YMAX COMMUNICATIONS CORP. - DC	280E	1

NPA 202 Thousands-Block holders Only

NPA Complex	OCN	Company
202	1958	ATX TELECOMMUNICATIONS SERVICES, LTD
202	2217	ATX TELECOMMUNICATIONS SERVICES, LTD-MD
202	5127	LIGHTWAVE COMMUNICATIONS, LLC - DC
202	5966	LIGHTWAVE COMMUNICATIONS, LLC - MD



CERTIFICATE OF SERVICE

I, Kimberly Wheeler Miller, hereby certify that on this 16th day of June 2020, a true and accurate copy of the enclosed was mailed by electronic mail to the following:

Sandra Mattavous-Frye, Esq.
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Kimberly Miller

Kimberly Wheeler Miller