



June 17, 2022

Electronically Filed

Steffany Powell Coker
Secretary to the Commission
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

Re: **Docket 5-TN-112** - Petition of the North American Numbering Plan Administrator, On Behalf of the Wisconsin Telecommunications Industry, For Relief of the "608" Numbering Plan Area

Dear Secretary Coker:

The North American Numbering Plan Administrator ("NANPA") hereby submits for filing a petition on behalf of the Wisconsin telecommunications industry for relief of the "608" Numbering Plan Area ("NPA") (aka "area code").

If you have any questions regarding this filing, please contact me at 925-420-0340.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Florence Weber", is written over a horizontal line.

Florence Weber
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dialing code to reach the National Suicide Prevention Lifeline.³ The Industry recommends the new overlay NPA be implemented based upon a 9-month schedule. Adhering to the Industry agreed-upon schedule will allow the new NPA to be implemented six-months prior to the projected exhaust of the 608 NPA. The Industry respectfully requests that the Commission expeditiously approve the Industry's plan to implement the overlay as set forth herein.

I. Background

The 608 NPA was created in 1955 as a result of a geographic split of one of the original Wisconsin NPAs, the 414. The 608 NPA serves the southwestern portion of the state and includes the State Capitol located in the city of Madison. The 608 NPA also serves Beloit, Janesville, La Crosse, Middleton, Monroe, Sun Prairie, Stoughton, Wisconsin Dells, and many other smaller communities. The 608 serves all or parts of the following counties: Adams, Buffalo, Columbia, Crawford, Dane, Grant, Green, Iowa, Jackson, Jefferson, Juneau, La Crosse, Lafayette, Marquette, Monroe, Richland, Rock, Sauk, Trempealeau, Vernon, and Walworth. The 608 NPA also serves Fort McCoy, one of the primary training bases in the United States for the U.S. Army.

The 608 NPA is bordered on the north by the 534/715 NPA, to the east by the 262 and 920 NPAs, to the south by the Illinois 779/815 NPA and to the west by the Iowa 563 and Minnesota 507 and 651 NPAs.

As required by the FCC, NANPA collects CO code assignment, utilization, and forecasted demand data to determine the projected need for numbering resources. NANPA uses this data to project the exhaust date of each area code and publishes the

³ See NANPA Planning Letter 556 published on the NANPA website at https://www.nationalnanpa.com/pdf/PL_556.pdf.

results twice a year. The April 2022 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA, projects the exhaust of the 608 NPA during the first quarter of 2024.⁴

NANPA declared a Jeopardy situation on March 30, 2022 for the 608 NPA. According to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines, Section 15.3.1, “An NPA Jeopardy condition exists when the forecasted and/or actual demand for Numbering Resources shall exceed the known supply during the planning/implementation interval for relief.” During a Jeopardy condition, the Industry is allocated a limited number of CO codes each month in order to prevent the depletion of CO codes before a new NPA can be implemented. The monthly rationing allocation of two CO codes per Operating Company Number (“OCN”) per month was determined at an Industry meeting on April 12, 2022.⁵

The only relief alternative which will meet Industry guidelines is an overlay.⁶ The 608 NPA is scheduled to transition to mandatory 10-digit local dialing by July 15, 2022 as a result of the FCC’s Order approving the designation of 988 as the three-digit abbreviated dialing code for the National Suicide Prevention Lifeline.⁷ As a result of this transition, 10-digit local dialing already will be in place prior to the

⁴ The April 2022 NRUF and NPA Exhaust Forecast Analysis (“April 2022 NRUF Report”) can be accessed on the NANPA web site at https://nationalnanpa.com/reports/reports_npa.

⁵ When demand for CO codes exceeds projections and there is insufficient time to implement a relief plan before exhaust, NANPA may declare Jeopardy (which may involve rationing of CO code assignments) to conserve the numbering resource until relief can be fully implemented.

⁶ NANPA reviews all possible relief alternatives per NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 1, 2022) (“NPA Relief Planning Guidelines”), Section 5.

⁷ Implementation of the National Suicide Hotline Improvement Act of 2018, Report and Order, FCC 20-100 (rel. July 17, 2020).

implementation of the new area code.⁸ In addition, the NPA Relief Planning Guidelines were amended to accommodate the impact the national implementation of the 988 abbreviated dialing code will have on area code relief. The amended Guidelines state that “where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing...the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.”⁹ Due to this change to the Guidelines, the only option for relief of the 608 NPA is an all-services distributed overlay. Accordingly, NANPA distributed a notice to the Industry on April 27, 2022 containing a draft relief petition for review prior to the Industry relief meeting.¹⁰ The Industry met on May 23, 2022 and approved the petition for an all-services distributed overlay of the 608 NPA.¹¹

II. Description of the Relief Plan

The all-services distributed overlay would superimpose a new NPA over the same geographic area covered by the existing 608 NPA and is projected to last approximately 24 years. NANPA will assign CO codes from the new overlay NPA

⁸ Educating customers regarding the start of 10-digit dialing is a part of the Industry 10-digit dialing transition plan for 988 implementation. Service providers have between October 24, 2021 and July 15, 2022 to remove 7-digit dialing in the 608 NPA from their networks. See the 988 milestones posted on the NANPA website at https://www.nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html

⁹ NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, April 1, 2022) at §5.63 (“NPA Relief Planning Guidelines”). In order to plan for the introduction of new area codes, NANPA and the Industry utilize the 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 located at [https://access.atis.org/apps/group_public/documents.php?view=.](https://access.atis.org/apps/group_public/documents.php?view=)

¹⁰ NANPA’s April 27, 2022 notice to the Industry is attached as Exhibit A and contains CO code assignment information, thousands-block pooling statistics, and a map of the overlay.

¹¹ A copy of the May 23, 2022 meeting minutes is attached and incorporated as Exhibit B.

once all assignable CO codes from the 608 NPA are exhausted. All existing customers would retain their current area code in the overlay area and would not have to change their telephone numbers. Customers in the 608 NPA will have transitioned to mandatory 10-digit local dialing as a result of the national implementation of the 988 three-digit abbreviated dialing code to reach the National Suicide Prevention Lifeline well before implementation of the new overlay NPA. The Industry-recommended dialing plan set forth in the following table is consistent with the 534/715 and 920/274 overlays in Wisconsin:

Dialing Plan for the 608 All-Services Distributed Overlay

Type of Call	Call Terminating in	Dialing Plan
Local, EAS, & ECC Calls	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)*
Toll Calls	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’s discretion

The Industry reached consensus to implement the new relief NPA in accordance with a 9-month schedule.¹² The schedule, outlined below, does not include specific dates, but rather timeframes to identify the phases of implementation. Once the Commission has approved the instant Petition, the Industry will select specific dates at an implementation meeting to ensure the dates do not interfere with certain holidays, high traffic calling days, network

¹² The NPA Code Relief Planning and Notification Guidelines at §7.2.

freeze periods, or other NPA relief implementation activities occurring across the country. Moreover, the Commission’s prompt approval of the instant Petition and adherence to the proposed implementation timeframe schedule will avoid the denial or delay of service to telecommunications providers’ customers due to the unavailability of CO codes.

**The Implementation Timeframe Schedule
for the 608 All-Services Distributed Overlay¹³**

EVENT	TIMEFRAME
Customer Education and Network Preparation Period*	9-months
Earliest Activation of CO codes in the new NPA **	At completion of Customer Education and Network Preparation Period and after all 608 CO codes are exhausted Six months prior to exhaust

* *There is no requirement for a permissive dialing period because mandatory 10-digit local dialing is already in place.*

***CO codes in the new NPA will not be assigned until all available codes in the existing 608 NPA are exhausted.*

The Industry will form an implementation committee to implement the new area code. The following table outlines the methods and processes the Industry typically utilizes in current relief projects for implementation of an initial overlay when mandatory 10-digit local dialing is already in place; however, the methods and processes outlined below may be modified by agreement of the Industry members during the

¹³ Per the NPA Code Relief Planning and Notification Guidelines at §5.10.1, once “the regulator issues an order (or other written approval) for NPA relief, NANPA should be provided approximately 75 calendar days from the date of the order (or other written approval) to assign a new NPA, ensure a press release is issued to announce the new NPA, to schedule and facilitate an implementation meeting, and publish the Planning Letter(s).”

actual implementation meetings:

Customer Education Milestones:

	Responsibility
1 Issue single customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release announcing overlay and new overlay NPA	Commission; Service Providers to the extent they are able to do so
3 Send Special letters to Directory Publishers	Co-chairs of industry committee
4 Update social media with information regarding the overlay	All Service Providers (optional)
5 Update websites with information regarding the overlay	All Service Providers
6 Develop language for use in Directories to alert the consumers of the new area code.	Service Providers that publish directories
7 Issue second press release just prior to the new overlay NPA's effective date	Commission; Service Providers to the extent they are able to do so

Technical Milestones:

	Responsibility
1 Obtain industry test code from NANPA and activate the test number.	One Service Provider volunteer
2 Open the test code in carriers' networks.	All Service Providers
3 Establish NPA Specific type of Trunks if needed	All Service Providers (as needed)
<u>E911 Work Plan</u>	
4 Confirm new ESN/NPD has been established for the new NPA	E911 Providers
5 Ensure SRDB table has new NPA built	E911 Providers
6 Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
7 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
8 Update PSAP equipment	PSAPs

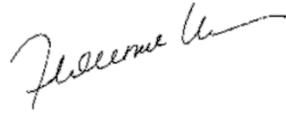
	Responsibility
9 Trunk Orders Complete and Activated	E911 Providers
10 Build E911 Network/Tandem Translations	E911 Providers
11 Verify if all PSAP work has been completed	PSAPs
12 Activate E911 Network/Tandem Translations	E911 Providers

III. Conclusion

The Industry requests that the Commission issue an order in response to the instant Petition approving an all-services distributed overlay relief plan as previously approved by the Commission for the 608 NPA and the recommended implementation schedule without a hearing. To the extent possible, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and reply comments. Once the Commission has granted this Petition, the Industry will implement an all-services distributed overlay over the 608 NPA in accordance with the implementation schedule set forth above. As

such, the Industry requests that the Commission grant this Petition no later than October 31, 2022.

Respectfully submitted,



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June 17, 2022

EXHIBIT A



April 27, 2022

To: All 608 NPA Code Holders and Interested Industry Members (Wisconsin)

Subject: Wisconsin 608 NPA Draft Petition Review

The North American Numbering Plan Administrator (“NANPA”) has scheduled an area code relief planning meeting via web conference to provide the telecommunications industry of Wisconsin (“Industry”) an opportunity to review and approve a draft petition to add a new NPA to the Wisconsin 608 NPA. According to the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061; “Guidelines”), “Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.”

The Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2021 NRUF Report”), published by NANPA, indicated that the 608 NPA would exhaust during the second quarter of 2025. On March 29, 2022, NANPA issued a modification to the exhaust forecast (“Delta NRUF”), due to an increase in Central Office (“CO”) code assignments, revising the projected exhaust date to the first quarter of 2024 and this date is included in the April 2022 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA on April 21, 2022. Additionally, on March 30, 2022, NANPA declared a Jeopardy situation for the 608 NPA. The *Guidelines* state when NANPA declares an NPA to be in Jeopardy, the relief planning process is to begin immediately.

NANPA will convene an Industry relief planning meeting on May 23, 2022, to review and approve the draft petition for the 608 NPA. The resulting relief plan will be filed with the Wisconsin Public Service Commission for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (“ATIS”) will be applied in the decision-making efforts.

Also attached with this notice is an agenda along with the consensus process, relief planning meeting aids, CO code summary, thousands-block statistics report, service provider CO code assignments by OCN, customer and technical milestone worksheet, draft petition, and related map.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on May 23, 2022. Past experience demonstrates that this could be the only meeting of the Industry before a decision is reached on the relief filing that will be submitted to the Commission for approval. The details of the relief planning meeting conference call are as follows:

Date: Monday, May 23, 2022

Time: 11 am PT; 12 pm MT; 1 pm CT; 2 pm ET

Join Zoom Meeting

<https://somos.zoom.us/j/85147425141?pwd=NGJ4TmRFZjdxVHZCYjJDNXk1YnJkZz09&from=addon>

Meeting ID: 851 4742 5141

Password: 991692

One tap mobile

8884754499,,85147425141# US Toll-free

8778535257,,85147425141# US Toll-free

Dial by your location

888 475 4499 US Toll-free

877 853 5257 US Toll-free

Meeting ID: 851 4742 5141

Please feel free to distribute this notice to others in the Industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 608 NPA, you are encouraged to sign up to NANPA's NANP Administration System ("NAS") NANP Notification System ("NNS") by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you wish to receive the draft petition in Word format for editing purposes, contact me prior to the meeting. If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@nanpa.com.

Sincerely,

Heidi A. Wayman

Manager, Data Management

NANPA

CC: Peter Jahn – Wisconsin Public Service Commission Staff

**Wisconsin 608 NPA
DRAFT RELIEF PETITION REVIEW MEETING**

**May 23, 2022
2:00 pm ET, 1:00 pm CT, 12:00 pm MT, 11:00 am PT**

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the Record

NANPA's Role and Responsibilities

Review INC Guidelines

Review 608 NPA Background, History and Status

Review of Draft Petition

Consensus on Implementation Intervals

Consensus on Customer Education & Technical Milestones

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussion

Adjourn

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.

5. NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. **NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.**

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least 15 years beyond the predicted date of exhaust, and may cover more than one relief activity, if necessary, during the time frame. If the only viable relief option is less than 15 years from the predicted date of exhaust, then NANPA shall provide this relief option.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, expansion of thousands-block number pooling, etc.). The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split or boundary realignment is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.
- e) For any relief activity proposed in the plan that requires number changes, it is recommended that customers who undergo number changes shall not be required to change again for a period of 15 years.
- f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit local dialing would otherwise be required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹
- g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e., two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

premise that all NXXs available for assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, 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, a difference in NPA lifetimes of more than 10 years, shall be avoided.

5.6.3 Relief For A Single NPA When 10-Digit Local Dialing Has Been or Will Be Implemented

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing³, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing 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 filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six (6) months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within 6 weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

5.7 Approval by Appropriate Regulatory Authority

When the regulator issues an order (or other written approval) for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one (1) week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.

5.8 Public Statements/Press Releases

Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA

³ For example, FCC 20-100, ¶153.

- and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some regulators may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two (2) weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating NPA boundaries and dialing procedures.

5.9 Industry NPA Relief Implementation Meeting

NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan (NANPA, on its own initiative or using input from Service Providers, has the option to convene a face-to-face meeting if the chosen plan presents unusual implementation factors.). The meeting shall occur no more than 45 calendar days following the assignment of a new NPA. The agenda for the industry implementation meeting should include relevant dates, implementation milestones, customer education considerations, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.

6. Alternative Relief Methods

All of the currently identified code relief alternatives are described below, but depending on the particular NPA and the distribution of assigned NXXs within it, some alternatives may not be compliant with the criteria in Section 5.0 above (e.g., in an NPA with a high concentration of assigned NXXs in one or only a few rate centers, the overlay may be the only possible relief method). Possible impacts of these alternatives are found in Appendices B, E and G.

6.1 NPA Split Method

By this method, the exhausting NPA is split into two or more geographic areas and a new NPA code is assigned to one of the areas formed by the split. This method generally acknowledges jurisdictional or natural boundaries but, for technical reasons and number optimization considerations, the actual boundaries must conform to existing rate center boundaries. Number changes are mandatory for customers assigned numbers from NXX codes that are moved to the new NPA.

6.2 Boundary Realignment Method

In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift/realignment occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected by this change, and number changes are mandatory for customers assigned numbers from NXX codes that are moved to the adjacent NPA. This method applies to multi-NPA states or provinces only. Boundary realignments must follow rate

center boundaries. This method is viewed as an interim measure because it tends to provide shorter-term relief than when providing a new NPA code.

6.3 All-Services Distributed Overlay Method⁴

An all-services distributed overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is generally provided by opening a new NPA code covering the same geographic area as the NPA(s) requiring relief. NXX codes from this new NPA are assigned on a carrier-neutral basis, i.e., first come, first served. With the overlay method, the FCC requires mandatory 10-digit local dialing between and within the old and new NPAs.⁵ Some states require 1 + 10-digit local dialing and some require 10-digit local dialing and allow 1 + 10-digit local dialing at the SP's discretion.

The all-services distributed overlay method eliminates the need for customer number changes as required under the split and boundary realignment methods. In areas where an overlay is already in place, a subsequent overlay eliminates the need for a permissive dialing period as part of implementation. In areas where mandatory 10-digit local dialing is already in place, an overlay eliminates the need for a permissive dialing period as part of implementation. Other potential implementation strategies have been identified for an all-services overlay, but they tend to provide shorter-term relief and/or may require additional technical work for some SPs. They are listed below:

6.3.1 Concentrated Growth Overlay

A concentrated growth overlay may be considered where the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new NXXs in that section would be assigned from the new NPA. As the NXXs allotted to the rural area near exhaust, the overlay boundaries could expand. For this option to be practical there must be a sufficient number of available NXXs to serve the non-overlay area and these must be designated for use only in the non-overlay area. This implies that NANPA must initiate the NPA relief planning process earlier than required if this option is to be feasible. Further, enforcement of mandatory 10-digit local dialing within the concentrated overlay or allowance of continued 7-digit dialing outside the concentrated overlay may be difficult for some SPs to manage within a single NPA. A concentrated growth overlay may cause customer dialing confusion and additional technical work for some SPs, and may require a longer implementation interval.

6.3.2 Boundary Elimination Overlay

With a boundary elimination overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and available NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary elimination might be in a state or province consisting of two NPAs, where one NPA has a considerable amount of relief life left. This solution has the advantage of not immediately requiring a new NPA code, but it also shares a limitation of boundary realignment because it offers shorter-term relief. Further, a boundary elimination overlay may require additional technical work for some SPs, and may require a longer implementation interval.

⁴ The LNPA Working Group Best Practice 30 supports the all-services distributed overlay as the preferred form of area code relief, and was endorsed by the North American Numbering Council (NANC) on September 18, 2013. See <http://www.nanc-chair.org/docs/documents.html>.

⁵ 47 CFR §52.19 (c) (3) (ii).

6.3.3 Multiple Overlay

The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists. Multiple overlays may require additional technical work for some SPs, and may require a longer implementation interval.

7 Other Relief Planning Considerations

This section describes miscellaneous considerations that should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Regulatory Involvement

Regulatory Involvement - Involvement of the appropriate regulatory authority staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

7.2 Timing and Schedules

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be in place six months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three months before the existing NPA would exhaust under the highest growth projections.

Relief Planning Meeting Aid
Customer Education and Technical Milestones

This meeting aid is a compilation of industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

Customer Milestones:

			Responsibility
		1 Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		2 Issue initial press release	
		3 Send Special letters to PSAPs and Directory Publishers	
		4 Update social media with information regarding the overlay	
		5 Update websites with information regarding the overlay	
		6 Develop language for use in Directories to alert the consumers of 10-digit dialing and the new area code.	
		After Permissive 7 and 10-Digit Dialing Begins	
		7 Issue second customer notification(e.g., bill messages, bill inserts, direct mail, text messaging, email)	
		8 Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	
		9 Update social media with information regarding additional overlay	
		10 Update websites with information regarding additional overlay	
		11 Issue second (Mandatory) press release	

Technical Milestones:

Relief Planning Meeting Aid
Customer Education and Technical Milestones

		Responsibility
	1 Obtain industry test code from NANPA and activate the test number.	
	2 Open the test code in carriers' network.	
	3 LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	
	4 Ensure Highway boxes are programmed with 10-digit dialing.	
	5 Network ready for Permissive Dialing	
	6 Create Permissive Dialing Industry Contact List	
	Permissive Dialing Begins	
	7 Establish NPA Specific type of Trunks	
	8 Completion of 10-digit signaling transition between carriers' networks	
	9 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	
	10 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
	11 Recorded announcements in Place and Tested	
	<u>E911 Work Plan</u>	
	12 Confirm new ESN/NPD has been established for the new NPA	
	13 Ensure SRDB table has new NPA built in	
	14 Notify PSAPs, PSALI customers and County Coordinators (1 st and 2 nd Notification)	
	15 Review and Submit CLEC Trunk Order Requests to local provider if needed	
	16 Update PSAP equipment	
	17 Trunk Orders Complete	

Relief Planning Meeting Aid
Customer Education and Technical Milestones

		18 Build E911 Network/Tandem Translations	
		19 Verify if all PSAP work has been completed	
		20 Activate E911 Network/Tandem Translations	

608 NPA Background Information

Relief Planning Background and Assumptions:

The 608 numbering plan area (NPA) was established in 1955 when it split off the 414 NPA which was one of the original area codes established in 1947 to serve the state of Wisconsin. The 608 NPA serves the southwestern portion of the state and includes the State Capitol located in the city of Madison. The 608 NPA also serves communities including Beloit, Janesville, La Crosse, Middleton, Monroe, Sun Prairie, Stoughton, Wisconsin Dells, and many other smaller communities. The 608 serves all or parts of the following counties Adams, Buffalo, Columbia, Crawford, Dane, Grant, Green, Iowa, Jackson, Jefferson, Juneau, La Crosse, Lafayette, Marquette, Monroe, Richland, Rock, Sauk, Trempealeau, Vernon, Walworth. Also included in the 608 NPA is Fort McCoy which is located in Monroe County and is one of the primary training bases in the United States for the US Army.

The 608 NPA is bordered on the north by the 534/715 NPA, to the east by the 262 and 920 NPAs, to the south by the Illinois 779/815 NPA and to the west by the Minnesota 507 and 651 NPAs and the Iowa 563 NPA.

Exhaust Forecast:

The October 2021 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“October 2021 NRUF Report”), published by NANPA, projected the exhaust of the 608 NPA during the second quarter of 2025 (2Q2025). Due to an increase in Central Office code assignments, a Delta NRUF was published on March 29, 2022 revising the exhaust date to the first quarter of 2024 (1Q2024) and this date is included in the April 2022 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis (“April 2022 NRUF Report”), published by NANPA on April 21, 2022.

Jeopardy:

NANPA declared a Jeopardy situation for the 608 NPA on March 30, 2022. According to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines Section 15.3.1, “An NPA Jeopardy condition exists when the forecasted and/or actual demand for Numbering Resources shall exceed the known supply during the planning/implementation interval for relief.” Interim Jeopardy procedures were implemented immediately with rationing set at three (3) CO codes per month. The first lottery submission period was from April 1 through April 7, 2022 and no CO codes were requested or assigned. A Jeopardy meeting was held on April 12, 2022, for the Industry to reach consensus on final Jeopardy procedures. During this meeting, the Industry reached consensus to set the rationing at two (2) CO codes per month and a trigger was set to review the rationing amount at the initial implementation meeting.

Dialing Plan

The dialing plan for the two current NPA overlays in Wisconsin: 534/715 NPA and 920/274 NPA

Type of call	Call terminating in	Dialing plan
Local, EAS, & ECC Calls	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)*
Toll Calls	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 dialing for all calls permissible at each service provider’s discretion.

Wisconsin Central Office Code Summary

NPA	608					
Assigned NXXs	734					
Reserved NXXs	0					
Unavailable NXXs	19					
Available NXXs	47					
Total	800					
Code Assignment History	2017	2018	2019	2020	2021	2022
	21	10	22	34	23	25*
*As of April 26, 2022						
April 2022 NRUF & NPA Exhaust Analysis	Projected Exhaust	Published				
	1Q2024	4/21/2022				
Jeopardy	Declared	Monthly Ration Amount				
	3/30/2022	2				
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).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	WI 608
MEETING DATE:	5/23/2022
POOL START DATE (PSD)	7/9/2003
RATE CENTERS	
# Total	159
# Mandatory	53
# Mandatory-Single Service Providers (M*)	0
# Optional	106
# Excluded	0
BLOCKS ASSIGNED	
# Total	384
<i>(For time period 6/01/21 - 4/26/22)</i>	
BLOCKS AVAILABLE	
#Total	1029
<i>(As of preparation date: 4/26/22)</i>	
CODES ASSIGNED	
# Total	41
# for Pool Replenishment	39
# for Dedicated Customers	0
# for LRNs	2
<i>(For time period 6/01/21 - 4/26/22)</i>	
CODES FORECASTED	
# Total	7
# for Pool Replenishment and Dedicated Customers	7
# for LRNs	0
<i>(For the next twelve months as of: 4/26/22)</i>	

WI 608 NPA Code Holder List

Company	OCN	CountOfNXX
AIRESPRING, INC.	996H	1
AIRUS, INC. - WI	936H	2
AMERICAN MESSAGING SERVICES, LLC	9748	4
AT&T - LOCAL	7421	4
AT&T CORP.	516C	4
BANDWIDTH.COM CLEC, LLC - WI	007F	13
BELMONT TEL. CO.	0847	1
BIG RIVER TELEPHONE COMPANY, LLC - WI	415H	2
BLACK EARTH TEL. CO.	0849	1
BRIGHTLINK COMMUNICATIONS, LLC	551G	1
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - WI	6508	50
CENTRAL STATE TEL. CO	0859	2
CENTURYLINK COMMUNICATIONS LLC - WI	1750	1
CENTURYLINK COMMUNICATIONS LLC - WI	7588	5
CENTURYLINK COMMUNICATIONS, LLC	508J	11
CENTURYTEL CENTRAL WISCONSIN LLC DBA CENTURYLINK	1159	24
CENTURYTEL MIDWEST-KENDALL LLC DBA CENTURYLINK	0924	5
CENTURYTEL MIDWEST-WI LLC NW DBA CENTURYLINK - NW	0922	13
CENTURYTEL MW-WI-CENCOM DBA CENTURYLINK - CENCOM	0841	1
CENTURYTEL MW-WI-PLATTEVL DBA CENTURYLINK PLATTEVL	0934	4
CENTURYTEL MW-WI-WAYSIDE DBA CENTURYLINK-WAYSIDE	0970	1
CENTURYTEL OF MONROE COUNTY, LLC DBA CENTURYLINK	0913	8
CENTURYTEL OF WISCONSIN, LLC DBA CENTURYLINK	0895	16
CHARTER FIBERLINK, LLC - WI	3839	23
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	1183	1
COCHRANE COOP. TEL. CO.	0866	2
COMMIO, LLC	939H	1
COON VALLEY FARMERS TEL. CO.	0868	3
CSC WIRELESS, LLC	425J	1
CUBA CITY TEL. EXCH. CO., INC.	0872	1
DICKEYVILLE TEL. CORP.	0875	1
FARMERS TEL. CO.	0880	4
FRACTEL, LLC	965H	7
FRONTIER COMMUNICATIONS OF WISCONSIN LLC	0967	1
FRONTIER NORTH INC. - WI	0886	53
FRONTIER NORTH, INC. - IL	1036	2
GRANTLAND TELECOM, INC.	0930	5
HD CARRIER LLC	321J	2
HIAWATHA BROADBAND COMMUNICATIONS, INC. - WI	375J	1
HILLSBORO TEL. CO., INC.	0892	1

WI 608 NPA Code Holder List

INTRADO COMMUNICATIONS, LLC	843C	1
IP HORIZON LLC	515J	1
LA VALLE TEL. COOP.	0899	2
LEMONWEIR VALLEY TEL. CO.	0900	2
LEMONWEIR VALLEY TELEPHONE COMPANY - WI	922G	2
LEVEL 3 COMMUNICATIONS, LLC - WI	5489	17
LEVEL 3 TELECOM OF WISCONSIN, LP - WI	7322	2
MARQUETTE-ADAMS TEL. COOP., INC.	0908	4
MCC TELEPHONY OF THE MIDWEST, LLC - WI	983F	19
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	7229	4
MCLEODUSA TELECOMMUNICATION SERVICES, INC. - WI	8283	5
METROPCS, INC.	5562	1
MH TELECOM, INC. - WI	3043	1
MICHIGAN WIRELESS, LLC DBA BUG TUSSEL WIRELESS	698E	5
MID-PLAINS TEL., INC.	0881	15
MT. HOREB TEL. CO.	0916	1
MT. VERNON TEL. CO.	0917	5
NEW CELL DBA CELLCOM	6692	1
NEW CINGULAR WIRELESS PCS, LLC - IL	6534	43
NUSO, LLC	478J	1
ONVOY SPECTRUM, LLC	624H	3
ONVOY, LLC - WI	225C	29
PEERLESS NETWORK OF WISCONSIN, LLC - WI	227F	2
RCLEC, INC. - WI	394H	1
RICHLAND-GRANT TEL. COOP., INC.	0942	5
SPRINT SPECTRUM, L.P.	6664	17
STRATUS NETWORKS	495J	1
TDS METROCOM, INC. - WI	7804	21
TECH COM, INC. - WI	2556	1
TELEPHONE USA OF WISCONSIN, LLC DBA CENTURYLINK	1155	5
TELEPORT COMMUNICATIONS AMERICA, LLC WI	7216	12
TELNYX LLC	073H	2
TENNEY TEL. CO.	0958	1
TERRA NOVA TELECOM INC.	145J	1
T-MOBILE USA, INC.	6529	4
TON80 COMMUNICATIONS, LLC	516J	22
TWILIO INTERNATIONAL, INC.	506J	1
UNITED STATES CELLULAR - WI	6274	75
US XCHANGE OF WISCONSIN LLC DBA CHOICE ONE COMM WI	7979	4
USA MOBILITY WIRELESS, INC.	6630	6
UTELCO, INC.	0963	12

WI 608 NPA Code Holder List

VERNON COMMUNICATIONS COOPERATIVE	717E	1
VERNON TEL. COOP.	0966	8
VONAGE AMERICA LLC	197D	1
WAUNAKEE TEL. CO.	0968	2
WINDSTREAM NORLIGHT, INC. - WI	553B	1
WISCONSIN BELL INC	9327	80
YMAX COMMUNICATIONS CORP. - WI	369E	1

Block holders with No CO Codes Assigned

Company	OCN
MARQUETTE-ADAMS TELEPHONE COOPERATIVE, INC. - WI	408G

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	ADAMS	ADAMS
608	ALBANY	ALBANY
608	ALMA	ALMA
608	ARCADIA	ARCADIA
608	ARENA	ARENA
608	ARGYLE	ARGYLE
608	AVOCA	AVOCA
608	BAGLEY	BAGLEY
608	BANGOR	BANGOR
608	BARABOO	BARABOO
608	BEETOWN	BEETOWN
608	BELLEVILLE	BELLEVILLE
608	BELMONT	BELMONT
608	BELOIT	BELOIT
608	BENTON	BENTON
608	BLACKEARTH	BLACK EARTH
608	BLAIR	BLAIR
608	BLANCHADVL	BLANCHARDVILLE
608	BLOOM CITY	BLOOM CITY
608	BLOOMINGTN	BLOOMINGTON
608	BLUE RIVER	BLUE RIVER
608	BOAZ	BOAZ
608	BOSCOBEL	BOSCOBEL
608	BRIGGSVL	BRIGGSVILLE
608	BRODHEAD	BRODHEAD
608	BROOKLYN	BROOKLYN
608	BROOKS	BROOKS
608	BROWNTOWN	BROWNTOWN
608	CAMBRIDGE	CAMBRIDGE
608	CAMPDOUGLS	CAMP DOUGLAS

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	CASHTON	CASHTON
608	CASSVILLE	CASSVILLE
608	CATARACT	CATARACT
608	CAZENOVIA	CAZENOVIA
608	CENTERVL	CENTERVILLE
608	CHASEBURG	CHASEBURG
608	CLINTON	CLINTON
608	COBB	COBB
608	COCHRANE	COCHRANE
608	COONVALLEY	COON VALLEY
608	COTTAGEGRV	COTTAGE GROVE
608	CROSS PL	CROSS PLAINS
608	CUBA CITY	CUBA CITY
608	DARLINGTON	DARLINGTON
608	DE FOREST	DE FOREST
608	DE SOTO	DE SOTO
608	DEERFIELD	DEERFIELD
608	DICKEYVL	DICKEYVILLE
608	DODGEVILLE	DODGEVILLE
608	EASTMAN	EASTMAN
608	EDGERTON	EDGERTON
608	ELROY	ELROY
608	ENDEAVOR	ENDEAVOR
608	ETTRICK	ETTRICK
608	EVANSVILLE	EVANSVILLE
608	FAIRPLAY	FAIRPLAY
608	FENNIMORE	FENNIMORE
608	FOOTVILLE	FOOTVILLE
608	FOUNTAINCY	FOUNTAIN CITY
608	GALESVILLE	GALESVILLE

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	GAYS MILLS	GAYS MILLS
608	GENOA	GENOA
608	GRATIOT	GRATIOT
608	HAZELGREEN	HAZEL GREEN
608	HIGHLAND	HIGHLAND
608	HILLSBORO	HILLSBORO
608	HOLLANDALE	HOLLANDALE
608	HOLMEN	HOLMEN
608	ITHACA	ITHACA
608	JANESVILLE	JANESVILLE
608	JUDA	JUDA
608	KENDALL	KENDALL
608	LA CROSSE	LA CROSSE
608	LA FARGE	LA FARGE
608	LA VALLE	LA VALLE
608	LANCASTER	LANCASTER
608	LIBETYSPOLE	LIBERTY POLE
608	LIME RIDGE	LIME RIDGE
608	LODI	LODI
608	LOGANVILLE	LOGANVILLE
608	LONE ROCK	LONE ROCK
608	LYNDON STA	LYNDON STATION
608	MADISON	MADISON
608	MARSHALL	MARSHALL
608	MAUSTON	MAUSTON
608	MAZOMANIE	MAZOMANIE
608	MCFARLAND	MCFARLAND
608	MELROSE	MELROSE
608	MERRIMAC	MERRIMAC
608	MIDDLETON	MIDDLETON

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	MILTON	MILTON
608	MINDORO	MINDORO
608	MINERAL PT	MINERAL POINT
608	MONROE	MONROE
608	MONROE CTR	MONROE CENTER
608	MONTELLO	MONTELLO
608	MONTFORT	MONTFORT
608	MONTICELLO	MONTICELLO
608	MOUNT HOPE	MOUNT HOPE
608	MOUNT ZION	MOUNT ZION
608	MOUNTHOREB	MOUNT HOREB
608	MT VERNON	MOUNT VERNON
608	MUSCODA	MUSCODA
608	NECEDAH	NECEDAH
608	NEW GLARUS	NEW GLARUS
608	NEW LISBON	NEW LISBON
608	NO FREEDOM	NORTH FREEDOM
608	NO WARREN	NORTH WARREN
608	NOAPPLERIV	NORTH APPLE RIVER
608	NORWALK	NORWALK
608	ONTARIO	ONTARIO
608	OREGON	OREGON
608	ORFORDVL	ORFORDVILLE
608	OXFORD	OXFORD
608	PACKWAUKEE	PACKWAUKEE
608	PARDEEVL	PARDEEVILLE
608	PLAIN	PLAIN
608	PLATTEVL	PLATTEVILLE
608	PORTAGE	PORTAGE
608	POTOSI	POTOSI

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	POYNETTE	POYNETTE
608	PRARIDCHIN	PRAIRIE DU CHIEN
608	READSTOWN	READSTOWN
608	REEDSBURG	REEDSBURG
608	RICHLD CTR	RICHLAND CENTER
608	RICHMOND	RICHMOND
608	RIDGEWAY	RIDGEWAY
608	SABIN	SABIN
608	SAUK CITY	SAUK CITY
608	SENECA	SENECA
608	SHULLSBURG	SHULLSBURG
608	SOLDIRSGRV	SOLDIERS GROVE
608	SOUTHWAYNE	SOUTH WAYNE
608	SPARTA	SPARTA
608	SPG GREEN	SPRING GREEN
608	STEUBEN	STEUBEN
608	STODDARD	STODDARD
608	STOUGHTON	STOUGHTON
608	SUNPRAIRIE	SUN PRAIRIE
608	TOMAH	TOMAH
608	TREMPEALEU	TREMPEALEAU
608	VERONA	VERONA
608	VIOLA	VIOLA
608	VIROQUA	VIROQUA
608	WARRENS	WARRENS
608	WAUMANDEE	WAUMANDEE
608	WAUNAKEE	WAUNAKEE
608	WAUZEKA	WAUZEKA
608	WEST SALEM	WEST SALEM
608	WESTBY	WESTBY

WI 608 Rate Center List

NPA	Abbreviated Rate Center	Rate Center Full Name
608	WESTFIELD	WESTFIELD
608	WILTON	WILTON
608	WIOTA	WIOTA
608	WISCONDLLS	WISCONSIN DELLS
608	WITWEN	WITWEN
608	WONEWOC	WONEWOC
608	WOODFORD	WOODFORD
608	WOODMAN	WOODMAN
608	YUBA	YUBA

534/715 NPA

507 NPA

920 NPA

563 NPA

262 NPA

779/815 NPA



Wisconsin 608 NPA Rate Center Map

- NPA Boundary
- Rate Center Boundary

April 2022

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EXHIBIT B



June 15, 2022

To: All 608 NPA Code Holders and Interested Industry Members (Wisconsin)

Subject: Final Minutes of the Draft Petition Review Meeting for the 608 NPA

Attached are the final minutes from the May 23, 2022 draft petition review meeting for the 608 NPA. These minutes became final on June 9, 2022.

If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@nanpa.com.

Sincerely,

Heidi A. Wayman
Manager, Data Management
NANPA

CC: Peter Jahn – WPSC Staff

**WISCONSIN 608 NPA
DRAFT RELIEF PETITION REVIEW MEETING
via WEB CONFERENCE
FINAL MINUTES
May 23, 2022**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, Manager, Data Management, North American Numbering Plan Administrator (“NANPA”), welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Heidi then reviewed the agenda and NANPA’s role and responsibilities.

NANPA’s ROLE AND RESPONSIBILITIES

Heidi reviewed NANPA’s roles and responsibilities for the meeting as follows:

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA will hold an industry NPA Relief Planning meeting no more than eight (8) weeks after the Jeopardy announcement. Jeopardy was declared for the 608 NPA on March 30, 2022.
- NANPA distributes the notice with the draft petition at least three weeks prior to the initial relief planning meeting, which was completed on April 27, 2022.
- The main objective is achieved by reaching consensus on the relief petition to be filed with the Wisconsin Public Service Commission (“Commission”).
- Determine if any additional items are to be included in the petition such as the implementation intervals, dialing plan, and any state specific requirements.
- NANPA is then charged with the responsibility of filing the relief petition, on behalf of the Wisconsin telecommunications industry (“Industry”), with the Commission. Once the Industry comes to consensus on what should be included in the petition, NANPA will file it within six weeks of today’s meeting or no later than July 4, 2022.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Heidi stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, Heidi stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

Heidi reviewed the most pertinent items from the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, “Guidelines”) for this meeting as follows:

Section 5.6.3 - Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit local dialing or has already transitioned to 10-digit local dialing¹, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan filing 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 10-digit local dialing will already be in place. The draft filing 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 filing. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six (6) months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 14 calendar days of the conference call.

Within 6 weeks of the conference call (unless otherwise agreed by the Affected Parties), NANPA shall submit the filing to the appropriate regulatory agency requesting approval of the overlay. After regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 – 5.12.

Heidi also reviewed Section 7.2 of the Guidelines which state:

Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In general, the relief implementation should be in place six months prior to the projected exhaust of the NPA, but in extraordinary situations, at least three months before the existing NPA would exhaust under the highest growth projections.

Heidi stated that the referenced sections of the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS

The 608 numbering plan area (“NPA”) was established in 1955 when it was split from the 414 NPA, which was one of the original area codes established in 1947, to serve the state of Wisconsin. The 608 NPA serves the southwestern portion of the state and includes the State Capitol located in the city of Madison. The 608 NPA also serves communities including Beloit, Janesville, La Crosse, Middleton, Monroe, Sun Prairie, Stoughton, Wisconsin Dells, and many other smaller communities. The 608 serves all or parts of the following counties Adams, Buffalo, Columbia, Crawford, Dane, Grant, Green, Iowa, Jackson, Jefferson, Juneau, La Crosse, Lafayette, Marquette, Monroe, Richland, Rock, Sauk, Trempealeau, Vernon, Walworth. Also included in the 608 NPA is Fort McCoy, which is located in Monroe County and is one of the primary training bases in the United States for the US Army.

The 608 NPA is bordered on the north by the 534/715 NPA, to the east by the 262 and 920 NPAs, to the south by the Illinois 779/815 NPA and to the south by the Minnesota 507 and 651 NPAs.

Exhaust Forecast:

The October 2021 Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis (“October 2021 NRUF Report”), published by NANPA, projected the exhaust of the 608 NPA to occur during the second quarter of 2025 (2Q2025). Due to an increase in Central Office (“CO”) code assignments, a Delta NRUF was published on March 29, 2022 revising the projected exhaust date to the first quarter of 2024 (1Q2024) and this date is included in the

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Per NANPA Planning Letter ([PL-556](#)), on July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022. The Order requires covered providers to implement mandatory 10-digit local dialing in NPAs that use both 7-digit local dialing and 988 as an NXX. The 608 NPA is included in the requirements of this FCC order.

Below is the implementation schedule of 10-digit dialing for the 988 3-digit code to reach the National Suicide Prevention Lifeline.

ACTION	TIME	DATE
Start of Network Preparation and Customer Education		July 16, 2020 (This starts the 9.5-month period prior to permissive dialing effective date for carriers to implement permissive 10-digit dialing in their networks and start educating customers about the upcoming dates.)
Start of permissive 10-digit dialing (“permissive 10-digit dialing effective date”)	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the “permissive dialing date” and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation.)
End of permissive dialing and start of mandatory 10-digit dialing (“mandatory 10-digit dialing effective date”)	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the “mandatory dialing date” and starts the 8.5-month period where carriers can start enforcing mandatory 10-digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)

End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing.)
Covered providers shall transmit all calls initiated by an end user dialing 988 to the current toll-free access number for the National Suicide Prevention Lifeline, presently 1-800-273-8255 (TALK)	12:01 am local time	July 16, 2022

NPA STATUS

CO Code Assignment History:

Heidi provided a read-out of the monthly CO Code Assignment Activity for the Wisconsin 608 NPA. As of May 22, 2022, the 608 NPA has 735 CO codes assigned, 46 CO codes available for assignment and 19 Un-Assignable CO codes. There have been 26 CO code assignments in 2022, 23 CO codes assigned in 2021, 34 CO codes assigned in 2020, 22 CO codes assigned in 2019, 10 CO codes assigned in 2018, and 21 CO codes assigned in 2017. (See Attachment #2)

608 NPA (Per Final Jeopardy Procedures, two CO codes can be allocated per month)

April 2022 – There were no CO code applications submitted and a lottery was not held.

May 2022 – One (1) CO code application was submitted, and one (1) CO code was assigned.

Heidi stated that with rationing in place, if two (2) CO codes are assigned in each month's lottery, the 608 NPA would exhaust after the April 2024 lottery.

Thousands-Block Status of 608 NPA

Thousands-Block pooling commenced on July 9, 2003. There are 159 rate centers of which 53 are mandatory and 106 are optional for pooling. From June 1, 2021 through May 22, 2022, there have been 399 blocks assigned and there are 1,036 blocks available as of May 22, 2022. For the same period, 42 CO codes have been assigned: 40 for pool replenishment and two (2) for LRNs. The forecasted need for CO codes for the next twelve months is six (6) CO codes for pool replenishment and dedicated customers. (See Attachment #3)

Heidi also reviewed the following documents that were included with the meeting notice:

- Code holder lists for the 608 NPA
- Rate center list for the 608 NPA
- 608 NPA rate center map

REVIEW DRAFT RELIEF PETITION FOR THE 608 NPA

Heidi reviewed the draft relief petition for the 608 NPA distributed on April 27, 2022, which recommends an all-services distributed overlay as the method for relief. A new NPA code would be assigned to the same geographic area occupied by the existing 608 NPA. Customers would retain their current telephone numbers and 10-digit local dialing is required. The 608 NPA is already transitioning to 10-digit local dialing due to the FCC designating the 988 three-digit access code to reach the National Suicide Prevention Lifeline, so a permissive dialing period is not needed. The projected life of the new area code is approximately 24

years based on historic assignment rates. The Industry reached consensus to approve NANPA’s recommended petition with some suggested edits.

DIALING PLAN

This dialing plan is consistent with current overlays in Wisconsin (534/715 NPA and 920/274 NPA) and will be the dialing plan recommended for the 608 NPA overlay:

Type of Call	Call Terminating in	Dialing Plan
Local, EAS, & ECC Calls	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)*
Toll Calls	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’s discretion

ESTABLISH IMPLEMENTATION SCHEDULE

The Industry reached consensus to recommend to the Commission a 9-month schedule for implementation of the overlay with the new NPA effective 6-months prior to the forecasted exhaust. The recommended schedule is as follows:

EVENT	TIMEFRAME
Customer Education and Network Preparation Period*	9-months
Earliest Activation of CO codes in the new NPA **	At completion of Customer Education and Network Preparation Period and after all 608 CO codes are exhausted Six months prior to exhaust

* There is no requirement for a permissive dialing period because mandatory 10-digit local dialing is already in place.

**CO codes in the new NPA will not be assigned until all available codes in the existing 608 NPA are exhausted.

CUSTOMER EDUCATION PLAN

The Industry will form an implementation committee to implement the new area code. The Industry participants attending the meeting reached consensus to include the following customer and technical milestones for implementation of an initial overlay when mandatory 10-digit local dialing is already in place. These milestones may need to be modified during the actual implementation of the new NPA.

Customer Milestones:

	Responsibility
1 Issue single customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Service Providers
2 Issue initial press release announcing overlay and new overlay NPA	Commission; Service Providers to the extent they are able to do so

3	Send Special letters to Directory Publishers	Co-chairs of industry committee
4	Update social media with information regarding the overlay	All Service Providers (optional)
5	Update websites with information regarding the overlay	All Service Providers
6	Develop language for use in Directories to alert the consumers of the new area code.	Service Providers that publish directories
7	Issue second press release just prior to the new overlay NPA's effective date	Commission; Service Providers to the extent they are able to do so

Technical Milestones:

		Responsibility
1	Obtain industry test code from NANPA and activate the test number.	One Service Provider volunteer
2	Open the test code in carriers' networks.	All Service Providers
3	Establish NPA Specific type of Trunks if needed	All Service Providers (as needed)
4	<u>E911 Work Plan</u>	
5	Confirm new ESN/NPD has been established for the new NPA	E911 Providers
6	Ensure SRDB table has new NPA built	E911 Providers
7	Notify PSAPs, PSALI customers and County Coordinators	E911 Providers
8	Review and Submit CLEC Trunk Order Requests to local provider if needed	All Service Providers (as needed)
9	Update PSAP equipment	PSAPs
10	Trunk Orders Complete and Activated	E911 Providers
11	Build E911 Network/Tandem Translations	E911 Providers
12	Verify if all PSAP work has been completed	PSAPs
13	Activate E911 Network/Tandem Translations	E911 Providers

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

The Industry reached consensus that NANPA will file the petition with the Commission informing them of the outcome of this relief meeting. The Guidelines require the relief petition be filed with the regulator within 6 weeks of the initial relief planning meeting, or by July 4, 2022, unless otherwise decided by the Industry.

OPEN DISCUSSION AND STATEMENTS FOR THE RECORD

There were no additional items for discussion and a statement for the record was not submitted.

REVIEW OF DRAFT MEETING MINUTES

The Industry reached consensus that the draft minutes resulting from this meeting will be distributed to the Industry no later than June 6, 2022. Any changes or corrections are to be submitted to Heidi via email at hwayman@nanpa.com no later than one week after the minutes are posted to the NANP Administration System (NAS) on the NANPA website when the minutes will become final.

The meeting was adjourned

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These minutes became final on June 9, 2022 without any edits.

**Wisconsin 608 NPA
Draft Petition Review Meeting
via Web Conference
May 23, 2022
Participants**

NAME	COMPANY
Sharon Poer	AT&T
Kathy Troughton	Charter Communications
Melinda Yost	DISH Wireless
Judy Geise	Frontier
Scott Bohler	Frontier
Lori Deal	ITCI
Rita Schmitz	Lumen/CenturyLink
Cecilia McCabe	NANPA
Heidi Wayman	NANPA
Linda Hymans	NANPA
Sonny Lubecke	Sinch
Karen Riepenkroger	T-Mobile
Shaunna Forshee	T-Mobile
Chanda Brown	Verizon
Dana Crandall	Verizon Wireless

Wisconsin Central Office Code Summary

NPA	608					
Assigned NXXs	735					
Reserved NXXs	0					
Unavailable NXXs	19					
Available NXXs	46					
Total	800					
Code Assignment History	2017	2018	2019	2020	2021	2022
	21	10	22	34	23	26*
*As of May 22, 2022						
April 2022 NRUF & NPA Exhaust Analysis	Projected Exhaust	Published				
	1Q2024	4/21/2022				
Jeopardy	Declared	Monthly Ration Amount				
	3/30/22	2				
Monthly Lottery	Applications Submitted	Monthly Allocations				
April 2022	0	0				
May 2022	1	1				
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).						

THOUSANDS-BLOCK STATISTICS	
ST/NPA:	WI 608
MEETING DATE:	5/23/22
POOL START DATE (PSD)	7/9/03
RATE CENTERS	
<i># Total</i>	159
<i># Mandatory</i>	53
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	106
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	399
<i>(For time period 6/01/21 - 5/22/22)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	1036
<i>(As of preparation date: 5/22/22)</i>	
CODES ASSIGNED	
<i># Total</i>	42
<i># for Pool Replenishment</i>	40
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	2
<i>(For time period 6/01/21 - 5/22/22)</i>	
CODES FORECASTED	
<i># Total</i>	6
<i># for Pool Replenishment and Dedicated Customers</i>	6
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 5/22/22)</i>	