
Office of Utilities Regulation

NPA (AREA CODE) RELIEF PLANNING

PHASE II

CONSULTATION

NPA RELIEF PLAN

DEVELOPMENT and IMPLEMENTATION



OFFICE OF UTILITIES REGULATION

June 2013

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COMMENTS FROM INTERESTED PARTIES

Persons who wish to express opinions on this Consultative Document are invited to submit their comments in writing to the OUR. Comments are invited on all aspects of the issues raised and the specific questions posed.

Responses to this Consultative Document are due by **August 05, 2013** and should be sent by post, fax or e-mail to: -

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Information considered confidential should be submitted separately and clearly identified as such. In the interest of transparency, respondents are requested to avoid confidentiality markings wherever possible. Respondents are encouraged to supply their responses in electronic form, so that they can be posted on the OUR's Website (or a link included where a respondents wish to post their response on their own website).

Comments on responses

The responses to this Consultative Document form a vital part of the consultation process, and so far as possible, should also be publicly available. Respondents will therefore have an opportunity to view and comment on the responses received from other contributors. Comments may take the form of correcting factual error or putting forward counter arguments, etc.

Comments on responses are requested by **August 19, 2013** and should be sent as indicated above.

Arrangements for viewing responses

To allow responses to be publicly available, the OUR will keep the responses that it receives on files which can be viewed by, and copied for, visitors to the OUR's Offices. Individuals who wish to view the responses should make an appointment by contacting the Information Officer by one of the following means:

Office of Utilities Regulation
Consultation Document:
NPA Relief Plan Development and Implementation
Document No. 2013/TEL/002/CON.001

Telephone: (876) 968 6053
Fax: (876) 929 3635
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Individuals may request photocopies of selected responses at cost price. Copies may also be ordered by post by sending a cheque made payable to “Office of Utilities Regulation.” (The contact details above may be used to find out the correct amount).

The consultation schedule is tabulated below:

EVENT	DATE
Response to this Document by interested parties	August 05, 2013
Comments on respondents’ submissions	August 19, 2013

1. INTRODUCTION

1.1 Telecommunications Numbering has broad importance. Apart from being a technical matter, numbering also addresses important commercial, economic and political considerations for telecommunications operators, regulators and policy makers. Individual countries must therefore ensure that their national numbering plan has adequate capacity and remains adaptable to an environment in which there is increasing flexibility and expanding innovation in technology and service creation, changing customer needs, and a growing national economic and social dependence on the Information and Communications Technologies (ICT) sector.

1.2 Therefore, numbers have become universally recognized, similarly as the radio spectrum, as a finite public resource (because of their limited availability) and one to be fairly and effectively administered for the overall national good. Thus, Section 8 of the Telecommunications Act, 2000 (the Act, the Telecoms Act), mandates the Office of Utilities Regulation (the Office; the OUR) as follows:

8. - (1) *The Office shall assign numbers for telecommunications services to carriers and service providers on a non-discriminatory basis.*
- (2) *In carrying out its functions under this section the Office shall develop a plan for the numbering of telecommunications services and may make rules pursuant to that plan regarding the assignment and use of numbers by carriers and service providers.*
- (3) *For the purposes of subsection (2) the Office shall –*
- (a) take account of relevant international regulations;*
 - (b) ensure that sufficient numbers are available for the current and reasonably anticipated future needs of carriers and service providers;*
 - (c) have regard to the role that numbers can play in conveying useful information to customers, including information about the type of service being used;*
 - (d) promote efficient use of numbers;*
 - (e) promote fair and open competition*
 - (f) as far as possible and subject to paragraphs (a) to (e), avoid the imposition of costs on customers as a result of changes in the numbering system;*

(g) *to such extent as may be reasonable and subject to paragraphs (a) to (f), preserve the numbering system maintained by the existing telecommunications carrier and the numbering allocations existing immediately before the appointed day.*

1.3 Accordingly, the Jamaican National Numbering Plan (Document No. Tel 2003/10) and the Telecommunications Numbering Rules (Document No. Tel 2009/01: Det/01) were developed and promulgated by the OUR.

1.4 The Jamaican National Numbering Plan is based on the North American Numbering Plan (NANP) which is the basic numbering scheme for the Public Switched Telephone Network for the United States and its territories, Canada, Bermuda, the Bahamas and sixteen Caribbean Countries. The 20 countries, which share Country Code 1, share the NANP numbering resources cooperatively. The North American Numbering Plan Administration (NANPA), an agency of the United States Federal Communication Commission (FCC), holds overall responsibility for the neutral administration of the NANP, subject to directives from regulatory authorities in the participating countries.

1.5 In Jamaica, the OUR, as the national Numbering Administrator, undertakes the primary administrative functions relating to the allocation, assignment and utilization of all NANP resources and coordinates related activities with the NANPA on behalf of Jamaican Telecommunications Carriers, Service Providers, and users; the OUR is the sole interface between Jamaican numbering resource applicants/assignees and the NANPA.

1.6 The area served by the NANP is divided into smaller Numbering Plan Areas (NPAs), each identified by a three-digit NPA code, commonly called an area code. The basic NANP number is ten digits in length, consisting of the three-digit NPA code followed by a seven-digit local number, in the format:

NXX-NXX-XXXX (where N is any digit from 2 through 9 and X is any digit from 0 through 9)

Table 1.1: Structure of the NANP Number

DIGIT ID & SEQUENCE ▶	ABC	DEF	GHIJ
FORMAT ▶	NXX	NXX	XXXX
SEGMENT ▶	NPA (Area Code)	Central Office (CO)Code	Line Number
		Directory Number (7-digit Local Number)	

In other words:

ABC (NXX) The first three digits - a 3-digit Numbering Plan Area (NPA) code or area code - ranging from 200 to 999

DEF (NXX) The second three digits - a 3-digit central office (or exchange) code - ranging from 200 to 999

GHIJ (XXXX)The last four digits - a 4-digit line number - ranging from 0000 to 9999. The central office code and the line number form the directory number, which is the telephone number with which people are most familiar

- 1.7** There are 800 possible combinations associated with the NXX format. Some of these combinations, however, are not available or have been reserved for special purposes. In the case of the NPA, the following NXX reservations have been made.

Table 1.2: NPA Reservations by NANPA

ERC Codes	When the second and third digits of an area code are the same, that code is called an Easily Recognizable Code (ERC). ERCs designate special services; e.g., 888 for toll-free service.
N11	These 8 ERCs, are used to provide three-digit dialling access to special services on a national basis.
N9X	The 80 codes in this format, called expansion codes, have been reserved for use during the period when the current 10-digit NANP number format undergoes expansion
37X and 96X	Two blocks of 10 codes each have been set aside by the INC for unanticipated purposes where it may be important to have a full range of 10 contiguous codes available

- 1.8** NPA codes are administered by the NANPA, subject to directives from regulatory authorities in the countries that share the NANP. In each participating country the relevant regulatory agency has plenary authority over numbers subsumed by the NPAs assigned to that country by the NANPA.

- 1.9** Under each area code there are approximately 800 central office codes (codes with '00' or '11' as the last two digits, e.g., 911, are not normally used as central office codes). Under each central office code there are ten thousand (10,000) line numbers. This provides roughly eight million (8,000,000) telephone numbers per NPA.

- 1.10** The NANP number format is thus commonly represented as NPA-NXX-XXXX and the term ‘NXX’ has become synonymous with ‘central office code’. This nomenclature is used throughout the rest of this document.
- 1.11** The varied uses of the telephone numbers under NPA Codes traditionally have included, for example, Plain Old Telephone Service (POTS), cellular mobile service, Centrex service, Direct Inward Dialling (DID), facsimile service, pagers, data lines, and pay phones.
- 1.12** NPA ‘876’ was assigned to Jamaica in June 1996. It was envisaged then, that that area code would provide sufficient numbering capacity for the next 20 years of demand growth. However, the country has had to consider the introduction of a new area code to augment the existing ‘876’ numbering space after just thirteen (13) years and, consequently, to move from the current standardized 7-digit to a mandatory 10-digit dialling for all local calls. The new dialling arrangement will be consistent with the wider North American industry migration towards the Uniform Dialling Plan (i.e., 10-digit local and toll dialling).

2. BACKGROUND

- 2.1** Up until 1995, Caribbean countries that joined the NANP were all assigned numbers exclusively within NPA 809. At that time just under 12.5% of the numbers had been assigned to Jamaica.
- 2.2** The NPA 809 was added to the NANP in 1958. Thirty-eight years later, in 1995, the exhaustion of the code was imminent owing to rapidly expanding customer bases, changing technology, and the introduction of various new products and services. Several Caribbean countries, including Jamaica, were compelled by the circumstances to request their own NPAs from the NANPA.
- 2.3** Jamaica was assigned the '876' NPA in June 1996. Activation of NPA 876 took place on Thursday, May 1, 1997. Permissive dialling (access to Jamaica by dialling either area code 876 or area code 809) was allowed until Saturday, November 1, 1997, at which time access to Jamaica was only allowed using the 876 area code.
- 2.4** The introduction of the new area code predated the establishment of a local independent regulatory body for the telecoms industry and Telecommunication of Jamaica Limited (TOJ, now C&WJ t/a LIME) was designated the 876 NPA Administrator by the government of Jamaica. As such, the company assumed full responsibility for the assignment, usage and control of the NXXs within this NPA, until the promulgation of the Telecommunications Act, 2000 which transferred the responsibility to the OUR.
- 2.5** Whilst the fixed-line telecoms market has declined over the years, the largely unexpected growth in the mobile market, since 2001, has consumed upwards of 4.3 million numbers. As at December 31, 2009, a total of 6,250,000 fixed-line and mobile numbers had been assigned to telecommunications Carriers and Service Providers, and the available supply of numbers, for all practical purposes, was considered insufficient to satisfy the Carriers' growth forecasts for the ensuing 5 years (and the potential demands from other reasonable foreseeable developments such as the extraterritorial use of Jamaican telephone numbers for nomadic telephone services to the Jamaican Diaspora, and from expected new market entrants). This signalled the exhausting of NPA 876.
- 2.6** The Numbering Resource Utilization Forecast surveys have shown that LIME holds a significantly large majority of the total unutilised fixed-line numbering resources (see Table 4.2), and which cannot be recovered without significant disruption to the company's existing subscribers in terms of number changes and the adverse economic and social consequences of such changes. The recovery of those numbers as a conservation strategy has been deemed all the more unlikely by the fact that the company has been implementing a similar number change in its Mobile network, in accordance with both an OUR Determination and Directive.

Besides, Section 8(3) paragraph (g) of the Telecommunications Act, 2000 makes special provision solely for that company, as the incumbent operator, to limit such number changes, but at the OUR's discretion.

- 2.7** It was determined therefore that NPA Relief activities would have to be undertaken, in accordance with standard industry practice. NPA Relief activities are undertaken to provide supplementary numbering resources where an NPA is exhausting, and normally involves assigning a new area code to the area served by the exhausting code. The planning process for the implementation of a new NPA is known as the NPA Relief Planning Process.
- 2.8** The OUR formally notified the Ministry, and other industry stakeholders, of the expected exhaust of NPA 876 in the 4th quarter of 2012 and the development of plans for the introduction of a new area code to provide code relief. The Notification was provided in Document No. TEL2010010_ADN001 – Advanced Notice, titled *NPA (Area Code) Relief Planning - Initial Phase: Industry Notification of NPA 876 Exhaust Period and Relief Code Reservation*, and dated August 26, 2010. This was the initial NPA (area code) Relief Planning Document.
- 2.9** Consequent upon on the OUR's preliminary notification to the NANPA in April 2010, regarding the imminent exhaust of NPA 876, the NANPA has reserved a new area code for Jamaica, pending formal application for its assignment on the basis that the relief of the NPA 876 is necessary to meet the immediate and foreseeable future numbering needs, and the longer-term availability of adequate supplies of numbers.

Purpose of Document

- 2.10** The planning process for the implementation of a new NPA is known as the NPA Relief Planning Process. NPA Relief activities (ending with the activation of a new area code) are undertaken to provide supplementary relief to an exhausting NPA. In this consultation document, the O.UR outlines the activities of the second phase of the NPA Relief Planning Process, and the NPA Relief Implementation exercise. The Relief Planning activities will be carried out through joint industry meetings hosted by the OUR.
- 2.11** The Second NPA (area code) Relief Planning Document (an Office Determination Notice) will be provided at least four weeks prior to the first industry meeting to allow individual industry members to adequately analyse the alternatives for NPA Relief and the other attendant issues. The document will provide the following Office Determinations:
- DETERMINATION on the NPA Code Relief Method
 - DETERMINATION for the finalization of a Relief Implementation Plan

The purpose of the Relief Implementation Plan (RIP) is to establish a plan and timeframe for implementing relief for NPA 876. The RIP will form the basis of the submission to the NANPA for the assignment of the new NPA to Jamaica, and will be posted on the NANPA website.

The RIP should address the activities, deliverables, and issues impacting all Telecommunications Carriers and Service Providers operating in Jamaica. Whilst not detailing activities internal to each Carrier and Service Provider the plan should outline their responsibilities, and make reference to activities that each entity will need to address in its own network, operational support systems and business operations.

The RIP will not cover activities for which there is already an established process for coordination between carriers to establish service (e.g., interconnection agreements between Carriers).

- DETERMINATION on the establishment of a Relief Planning Committee (RPC)
- DETERMINATION on The establishment of NPA Relief Implementation Task Forces
- DETERMINATION on an NPA Relief Implementation Schedule
- DETERMINATION on Task Force activities and Network Operator and Service Provider responsibilities

2.12 The document will also outline:

- The Relief Implementation Plan to be finalized by the RPC
- The schedule of planning meetings
- Guidelines for planning meetings
- Attributes of Some Relief Alternatives
- Issues to be considered during NPA Relief Planning
- Issues to be considered during NPA Relief Implementation
- Technical Considerations

2.13 The Relief Implementation Plan may need to be changed over time to reflect changes that take place such as increases in demand for NXX codes for growth, or other factors (local competition, implementation of local number portability, etc.). The OUR will make new Determinations to address such developments as they occur.

3. NPA RELIEF PLANNING PROCESS

- 3.1** The objective of the NPA Relief Planning Process is to ensure an adequate supply of CO Codes and telephone numbers is always available to the local telecommunications industry and users. Relief Planning normally begins well in advance of the implementation date for the new NPA. The actual time, however, will vary from country to country, depending on several factors, one of which is the urgency for number relief.
- 3.2** Having made the necessary decisions to implement a new NPA, the relevant regulatory authority must then make a formal request to the NANPA for the assignment of the new area code to the country. Once the code has been assigned, it is then up to the country of assignment to execute the scheduled implementation.
- 3.3** Any of the several alternative methods of NPA Relief will result in actual number changes and/or changes in the representation of existing numbers (e.g. from a 7-digit to a 10-digit format in equipment and devices or on signage). To be sure, the OUR is cognizant of the fact that the cost of number changes to customers can be substantial; but the cost of running out of numbers is considerably higher.
- 3.4** To the extent reasonable and appropriate, the OUR will seek to adopt existing NANP industry Guidelines and best practices in the formulation of the NPA Relief Plan for Jamaica.
- 3.5** In general, the NPA Relief Planning Process, through which NPA code relief is coordinated, includes:

The Preliminary Phase

- Conducting Numbering Resource Utilization and Forecast (NRUF) surveys
- Estimation of the NPA exhaust period
- Request to NANPA for the reservation of a new area code

The Plan development and Implementation Phase

- Industry consultation to examine: alternative methods of providing a new supply of numbers; issues related to subscribers, network operators and service providers; other industry concerns.
- Determination on a specific relief plan by the Office, and formal request to NANPA for assignment of the new NPA
- Publishing of Planning Letter by NANPA describing the approved relief plan, and announcing the new area code
- Commencement of the NPA implementation process.

3.6 The OUR performed the preliminary NPA relief activities and published the results on August 26, 2010 in the document: NPA Relief Planning [Preliminary Phase] - Industry Notification of NPA '876' Exhaust Period & Relief Code Reservation (Document No. TEL2010010_ADN001 – Advanced Notice). In that phase, the OUR:

- 1) determined from number utilization information and NXX demand forecasts submitted by Carriers and Service Providers, as well as historical growth data submitted in support of their applications for additional numbering resources, and, other prospective numbering demands, that NPA 876 required Relief;
- 2) established the fourth quarter of 2012 as the expected NPA Exhaust Period;
- 3) notified the North American Numbering Plan Administration as follows:

“It is the view of the Office of Utilities Regulation (OUR) that the NPA, 876, assigned to Jamaica will exhaust within 2 – 3 years, based on our most recent NRUF forecast and other indicators. We therefore see the need to begin preparations for the requisite NPA Code Relief...”

3.7 The Office’s notification was considered sufficient for NANPA to reserve a relief NPA for Jamaica. The reserved code was not disclosed by NANPA at that time as a matter of course.

3.8 The OUR will act as the NPA Relief Planning Coordinator in Jamaica, with input from the North American Numbering Plan Administration in terms of NPA code assignment and broader industry notification. The OUR will moderate industry relief planning meetings and will do so fairly and impartially, ensuring that all participants have an opportunity to express their views on the attendant issues. However, the ultimate decision as to the relief methods to be employed will rest with the OUR.

4. NPA EXHAUST INFORMATION

History of exhaust situation

- 4.1 As at December 31, 2009, a total of 6,250,000 Geographic (Fixed-Line) and Mobile numbers had been assigned to carriers.

Table 4.1: Number assignments and Utilization as at December 31, 2009

	RESOURCES ASSIGNED TO CARRIERS		% UTILIZATION REPORTED
	CO Codes	Numbers	
FIXED ►	188	1,880,000	20
MOBILE ►	437	4,370,000	90

* Estimated

Table 4.2: Unutilised Numbering Capacity as at December 31, 2009

SERVICE	ALLOCATED BALANCE	HELD BY CARRIERS	TOTAL
Mobile	700,000	440,000	1,140,000
Fixed	1,010,000	1,504,000	2,514,000

Table 4.3: Mobile NXX Assignments 2007-2009

ANNUAL NXX ASSIGNMENTS FOR MOBILE SERVICES	
YEAR	QUANTITY
2007	46
2008	5
2009	20
TOTAL	71

Mobile NXX assignments for 2010 = 25

- 4.2 The Initial Planning Document highlighted the conspicuous disparity, in the case of fixed-line numbers, between the quantity assigned to carriers and the quantity utilized by them at the time (Table 3.1) - a result of the legacy assignments from the pre-liberalization period, and the decline of the fixed-line market.

- 4.3** The recovery and reallocation of fixed-line resources to meet the significantly greater demand for mobile resources (and delay the exhaustion of the NPA) was viewed as an option for immediate treatment of the numbering capacity problem and the imminent exhaustion of the NPA but, was also deemed a very costly and disruptive proposition. This especially as a similar measure had been applied to facilitate the initial development of the National Numbering Plan, and would again impact only Cable & Wireless Jamaica Limited. In both instances, the OUR appropriately exercised its discretionary powers under section 8(3), paragraph (g), of the Telecoms Act.
- 4.4** It was pointed out however, that the prospective reversal of the decline of the fixed-line market, from the emerging application of broadband access technologies locally, and the provision of nomadic VoIP services, that would be facilitated by the proposed extraterritorial use of Jamaican (ITU E.164) numbers, in the significantly large Jamaican Diaspora (mainly in the United Kingdom, the United States and Canada), would in all likelihood significantly increase the demand for fixed-line numbers.
- 4.5** All other options considered (including ‘Thousand Block Pooling’ which was unlikely to be viable), the immediate treatment of NPA exhaustion solely on the basis of the existing unassigned numbering capacity imposed the least burden and was therefore the approach preferred for adoption.

Carriers NXX Growth Projections

Table 4.4 Carriers’ Five-Year Growth Projections From December 31, 2009 NRUF Survey

GROWTH PROJECTIONS						
	YR 1 ¹	YR 2	YR 3	YR 4	YR 5	TOTAL
MOBILE	35	37	28	38	35	173
FIXED	11	9	11	10	10	51
CO CODES ►	46	46	39	48	45	224

- 4.6** Referring to the Carriers’ Five-Year Growth Projections from the December 31, 2009 NRUF Survey presented in table 4.4: In Year 1(2010), 71.4% of the projected growth in mobile NXXs, and 45.5% for fixed line NXXs, were realized. There was zero growth in years 2 and 3.

¹ Year 2010

Present Situation

- 4.7 The Table 4.5 outlines the numbering range allocations in Jamaica as at December 31 2012.

Table 4.5 Number allocations as at December 31 2012

NPA 876 NUMBER ALLOCATIONS		
NUMBER RANGE	ALLOCATION	COMMENTS
N00	Special Services	Easily Recognizable Codes.
N11	Access Codes	
1XX	Access Codes	
20X-25X	Growth	
26X -29X	Mobile	
3XX	Mobile	
4XX	Mobile	
444	Special Services	Premium Rate - Mobile
5XX	Mobile	
60X-63X; 66X-69X	Geographic	
64X-65X	VoIP	
70X-76X	Geographic	
77X-79X	Mobile	
8XX	Mobile	
9XX	Geographic	
976	Special Services	Premium Rate - Fixed
YYY (222, 333, ..., 999)	Special Services	Easily Recognizable Codes

- 4.8 Following the acquisition of Oceanic Digital Jamaica Limited (then t/a Claro) by Digicel Jamaica Limited, the OUR transferred the mobile NXXs held by Claro to Digicel. The single fixed line NXX held by Claro was reclaimed by the OUR. Table 4.6 shows the total unassigned numbering capacity as at December 31, 2012.

Table 4.6 Unutilised Numbering Capacity as at December 31, 2012

SERVICE	ALLOCATED BALANCE	HELD BY CARRIERS	TOTAL
Mobile	700,000	440,000	1,140,000
Fixed	1,010,000	1,504,000	2,514,000

4.9 Recent and proposed developments in the local telecommunications markets and their potential impact on the demand for numbering resources are outlined in Table 4.7:

Table 4.7: Potential Impact of Market Developments on Numbering

MARKET DEVELOPMENT	POTENTIAL IMPACT
Acquisition of Claro by Digicel	Reduced competition and subscription
Lowering of Mobile Termination Rates	Increased competition and subscriber growth b/o significant price reductions
Lowering of Mobile Termination Rates	Reduced subscription levels b/o of lowered incentives(on-net discounts) for subscribers to maintain mobile accounts on more than one network
Removal of Restriction on Mobile Licences	Increased competition and subscriber growth b/o removal of restriction to market entry
Number Portability	Heightened/increased competition (subscriber growth with new market entrants)
Extraterritorial use of Jamaica’s ITU-T E.164 Numbers in Jamaican Diaspora (US/UK/Can.)	Increased competition and subscriber growth

4.10 The acquisition of Claro by Digicel and the setting of interim mobile termination rates by the OUR have had immediate impacts on the demand for and utilization of numbering resources, and consequently have served to delay the exhaustion of the 876 NPA.

4.11 There are prospects for new entries to the mobile market as facilities-based service providers and Mobile Virtual Network Operators. This was made possible by the government’s relaxation of restrictions on the number of mobile licences that may be granted.

4.12 Whilst the implementing of number portability does not automatically increase competition, it is one of the tools available to a regulator to increase competitiveness in a market that is characterised by quality of service issues, customer service problems and high prices. The main positive effects, which potentially could have implications for numbering, include:

- Heightened competition from lower prices;
- An increase in additional services and/or features and,
- Prevention of market stagnation because it increases pressure for service providers to continue to offer competitive and compelling services

Question: *What are your views on the potential impact of the specified market developments on numbering?*

Question: *What other market conditions and impacts, if any, should be taken into consideration?*

5. COMPARATIVE ASSESSMENT OF RELIEF OPTIONS

5.1 There are two basic alternative NPA relief methods that may be considered for the local industry: the NPA Split method and the NPA Overlay method as illustrated in Figure 4.1. There are variations from the standard implementation strategy for the Overlay method but these are usually applied in areas where multiple NPAs already exist.

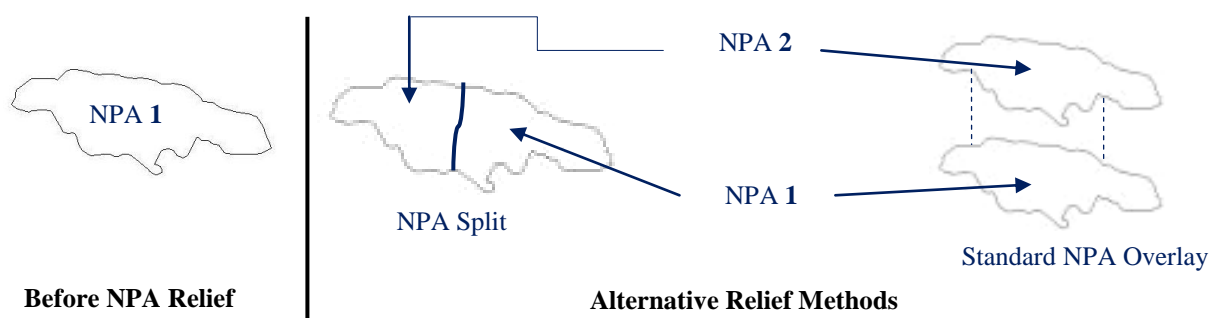


Fig. 5.1: Alternative NPA Code Relief Methods

5.2 **NPA Split Method** - In 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. The old NPA is retained in another. This method generally recognizes natural or jurisdictional boundaries.

5.3 The general attributes of a split are:

- a) A frequently implemented method of NPA relief in the past but is now significantly less desirable.
- b) 7-digit dialling can easily be retained for local calls within area codes.
- c) Number changes are required within new area code boundaries (NPA changes).
- d) The time required to transition to a new area code with a split is usually longer than the time needed to transition to mandatory 10-digit local dialling for a first-time overlay.
- e) Is not a practical method for relief for an area that has previously been relieved by an overlay or already has mandatory 10-digit local dialling, since it is costlier and more time consuming than an additional overlay would be, and does not provide the benefit of retaining 7-digit dialling.
- f) Reprogramming (or replacement) of equipment (switches, PBXs, cellular phones, etc.).
- g) Many existing customers are affected by telephone number changes.
- h) More economic burden may generally be caused by customer number changes (businesses, public costs, stationery, etc.) than an overlay.

- i) May not be as expensive to display numbers in telephone directories.
- j) Requires a permissive dialling period for customers' numbers in the new area code.
Possible dispute over which portion of the area retains the existing NPA.
- k) Potential for associating new NPAs with smaller geographic areas within the exhausting NPA.

5.4 The Jamaican National Numbering Plan established fourteen (14) rate centres on the basis of the existing parish boundaries. These, for example, could provide a basis for the delineation of NPAs in a 'split' scenario.

5.5 **Standard Overlay Method** - An NPA overlay takes place 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.

5.6 The general attributes of an overlay are:

- a) A frequently implemented method of NPA relief in the NANP area in recent years;
- b) Requires mandatory 10-digit local dialling throughout the area codes being relieved.
- c) No number changes are required for existing customers.
- d) Least disruptive to end-users (allows users to retain current telephone numbers).
- e) Creates less economic burden for existing business than a geographic split.
- f) In a single residence or business there may be numbers in two or more NPAs.
- g) Directory costs may increase to print 10-digit numbers.
- h) If mandatory 10-digit dialling does not exist in the area codes being relieved and a transition to mandatory 10-digit dialling is required, the transition can be implemented in a shorter time than the Permissive Dialling Period required with an area code split.
- i) Favoured by Carriers and Service Providers due to cost considerations (e.g., no number changes in Operating Support Systems (OSSs), no need to reprogram wireless devices).
- j) If the overlay is of multiple NPAs, it reduces the number of areas for which future relief must be separately planned.

5.7 Carriers should use 10-digit signalling for all local traffic they send to other Carriers, and should be able to receive 10-digit signalling on local traffic they receive from other Carriers

- 5.8** When an overlay relief NPA is activated, mandatory 10 digit dialling should be in place for all local calls originating within the area being relieved, which means that local calls dialled with 7 digits would not be completed. When mandatory 10-digit local dialling is in place it should apply equally to calls originating from numbers in the existing NPA(s) and from numbers in any new overlay NPA(s).
- 5.9** The attributes show clear advantages for the Overlay method which is therefore preferred and proposed by the OUR as by far the more suitable relief method for NPA 876.

Question: *Do you agree that the Standard Overlay method is the more suitable of the two stated relief methods, for NPA 876, and therefore should be adopted? If not, why? Provide clear justification for any proposed alternative.*

6. IMPACTS OF NPA CODE RELIEF

Stakeholder Impacts

6.1 The introduction of a new area code is an involved undertaking requiring input from nearly all functional areas of Carriers and Service Providers' business operations. Stakeholders must therefore be fully aware of the potential issues that regulators, the telecommunications industry and the general public might experience, regardless of the type of area code relief. Failure to recognize and give appropriate attention to these impacts could have far reaching consequences, nationally and internationally.

6.2 In general, affected areas and the impacts include:

- Customer Premise Equipment (CPE) - modifications and information update
- Domestic and international networks - hardware and software modifications
- Operations support systems – modifications, information update
- Business and support activities (directory services, customer services)
- Modification of non-telecommunications databases and applications that contain telephone numbers
- National Numbering Plan changes
- National Dialling Plan changes

6.3 The following lists provide more detailed examples of issues that may be encountered and areas of impact with the introduction of a new area code:

- **Customers/Subscribers**
 - Revision of printed materials (e.g., stationery, business cards, labels, bills)
 - Reprogramming/updating of equipment, devices, etc., that store and analyse telephone numbers (e.g., PBXs, cellular phones, modems, speed call lists, alarm company automatic diallers, and other automatic diallers, voice messaging systems, Call Detail Recording (CDR) Software)
 - Updating of directory listings for number changes; change listings from 7-digit to 10-digit numbers
 - Notification of customers and business associates, as well as friends and family
 - Changing of advertising (e.g., print ads, classified ads, promotional materials, signage, etc.)
 - Impact on market identity/recognition, geographic identity, public familiarity
 - Public reaction to and political involvement in NPA boundary decisions

- **Public Telecommunications Carriers and Service Providers**

Switching systems, etc., must accommodate the additional NPA

- If a split is implemented, major database changes required due to telephone number changes.
- Changes to existing network routing translations
- Modification to or replacement of some operations support systems
- Modification to operator services systems
- Directory Assistance impacts
- Directory changes
- Impact of permissive dialling period
- Impact on dialling plan
- public notification/education requirements

Functional Areas to be impacted

- Planning, Provisioning, Network Operations
- Business Office, Installation & Repairs, Sales and Support
- Marketing
- Finance
- Corporate Communications
- International Relations

- **Regulatory Matters**

- Development and execution of Relief Plans
- Modification of National Numbering and Dialling Plans
- Treatment Post-Relief developments relating to stakeholders
- NPA code utilization

- **Others**

- Resellers
- International Carriers
- Number Portability Service Providers
- CPE Community: Vendors, Maintenance Supports, Owners
- Industry Linked: Hotel, Security, Messaging, Apartment Owners

Dialling Plan Impacts

6.4 It is important that the impact of NPA relief on the dialling plan be precisely understood. The essential facts are:

- Currently 7-digit dialling is mandatory for domestic sent-paid calls within NPA 876. The dialling plan will change to 10-digit dialling when NPA 876 relief is implemented, regardless of the relief method chosen, if the policy of a uniform domestic dialling plan is maintained, and should be as outlined in Table 6.1:

Table 6.1: Impact of NPA Relief on the Dialing Plan

CALLS ►	Local Calls	Local Calls	Toll Calls	Toll Calls
NPA ►	Current (876)	Future (876 & New)	Current (876)	Future (876 & New)
DIGITS ►	7 digits	10 digits	7 digits	10 digits

- NPA relief will not affect the dialling plan for calls terminating outside of the Jamaican NPAs
- No local calling will become toll calling and no toll calling will become local as a result of NPA relief.

6.5 It goes without saying, therefore, that the introduction of a new area code can have significant cost implications, and thus, requires judicious planning, cooperation and timely action in all areas of stakeholder involvement.

Question: *Do you consider the scope of the NPA Relief impacts outlined above to be sufficiently broad to adequately prepare to address impact risks?*

Question: *Do you envisage any other important implications of the 876 NPA relief?*

Question: *What other issues do you think should be considered during the NPA Relief Planning?*

7. MANDATORY DIALLING

10-Digit Local Dialling

- 7.1** The Introduction of a new area code should move the country from the current standardized 7-digit to a mandatory 10-digit dialling for all local calls. The change will be consistent with the wider North American industry migration towards the Uniform Dialling Plan (i.e., 10-digit local and toll dialling).
- 7.2** Full 7-digit local dialling after an NPA Split or Overlay would require the institution of ‘protected codes’ which is an assignment practice whereby a central office code (NXX) assigned in one NPA is not made available for assignment in an adjacent NPA in order to permit 7-digit dialling across the NPA boundary. The practice is now considered highly wasteful of a finite numbering resource and is strongly discouraged in the industry and therefore, should not be considered for the NPA 876 relief.
- 7.3** Alternatively, after an NPA Split, 7-digit dialling could easily be retained for local calls within area codes, with mandatory 10-digit dialling across the NPA boundary. This, however, would conflict with the above-mentioned North American industry migration towards the Uniform Dialling Plan.

Permissive Dialling Period

- 7.4** A permissive dialling period (a period during which time both the new NPA code, or the new dialling format, and the previous ones, may be dialled or used to reach a required destination) should precede mandatory dialling of the new NPA code. Permissive dialling periods as short as four months, and as long as two years, historically have been used in North America. In any event, this period should allow sufficient time for customers to make changes such those outlined in Section 6.
- 7.5** During the permissive dialling period, in an initial Overlay, callers should be able to originate calls with or without dialling the NPA (i.e. 7-digit or 10-digit dialling). However, during this time there would have to be a limited application of protected codes. For subsequent NPA overlays in a given geographic area, a permissive dialling period would not be mandatory because all callers already would have been dialling local calls on a 10-digit basis.
- 7.6** The permissive dialling period is also required in an NPA Split. During that period, calls placed to the area to be served by the new NPA should be completed whether the new or the existing NPA code is dialled by the caller. A limited application of protected codes would be required in this situation also.

7.7 The elimination of local 7-digit dialling and introduction of mandatory 10-digit local dialling can be effected in the following ways:

a) Permissive dialling period, followed by mandatory recorded announcement -

This method uses a defined permissive period during which local calls dialled with either 7 or 10 digits complete with no announcement. At the end of the permissive period, local calls dialled with 7 digits are routed to an announcement advising the caller to redial with the area code. This method is used when new NPAs are overlaid in the USA and has been used on a limited basis in Canada.

b) Transition period with announcement plus cut-through, followed by mandatory announcement -

This method includes a transition period, during which any local call dialled with 7 digits reaches an announcement, and then the call is automatically cut-through to the called number. When the transition period ends, local calls dialled with 7-digits are routed to an announcement advising the caller to redial with the area code, and cut-through ceases. This method has been used by most Carriers for Canadian NPA reliefs that required the elimination of 7-digit local dialling and introduction of mandatory 10-digit local dialling,

7.8 It is the view of the OUR that whilst a recorded announcement plus cut-through could significantly increase call set-up time, depending of course on the content and length of the message, this method very likely would ensure quicker compliance with the new dialling arrangement. However, the message would have to be appropriately worded to avoid wasted calls as some callers may hang up before the call is cut-through to the called number because they did not have a quick understanding of the message.

7.9 Importantly, if the messaging regarding the permissive dialling period is clear in the public education programme, callers may be tempted to exploit the shorter dialling capability, and therefore, consideration should be given as to whether mention should be made of the permissive dialling period outside of this consultation document.

Mandatory Dialling

7.10 The end of the permissive dialling period is the date that mandatory dialling of the new NPA code should begin and all customer number changes are completed for customers assigned numbers from NXX codes that are moved to the new NPA (in the case of an NPA Split) or the date that the new dialling arrangement is required (in an overlay). At this stage, all calls to both the old and new NPA codes must be dialled with the correct NPA. All misdialled calls should be intercepted by a recorded announcement.

7.11 Changes to the date for mandatory dialling should be avoided as much as possible to ensure unambiguous customer education communications, to prevent unnecessary customer and Service Provider confusion, and to minimize rescheduling or additional changes to Service Providers' networks and customer facilities.

Question: *Do you agree that Jamaica should move from the current standardized 7-digit to a mandatory 10-digit dialling for all local calls, whether an NPA Split or an Overlay relief method is applied for the NPA 876 relief? If not, please give your reasons and, explain what you think would be an appropriate dialling alternative.*

Question: *Which of the options, a) or b) above, to effect the elimination of local 7-digit dialling and the introduction of mandatory 10-digit local dialling do you think is more appropriate?*

Question: *Should the public be informed, in the public education programme, about the permissive dialling period?*

8. NPA RELIEF PLANNING PRINCIPLES AND CONSIDERATIONS

- 8.1** The Objective of the NPA relief planning process is, in the immediate term, to ensure that NPA relief occurs before the exhaust of existing numbering resources, and in the long term, to ensure that an adequate supply of CO Codes is available at all times to the Jamaican telecommunications industry on a rational and equitable basis.
- 8.2** The NPA Code and the subsuming CO Codes are public resources, and therefore, administrative assignment of these codes does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which the resource is assigned. Thus, the efficient control, judicious use and timely relief of a finite numbering resource are a national imperative.
- 8.3** The OUR, in accordance with section 8 of the Telecom Act, has the ultimate authority to approve or reject any recommended relief plan.
- 8.4** The following key considerations are therefore important to the success of the NPA relief planning process:
- The NPA Code Relief Coordinator should facilitate the selection of an NPA relief plan based upon an objective assessment of all relevant circumstances.
 - All efforts should be made to choose a plan that does not favour a particular interest group, i.e., no relief plan should give one Carrier or group of Carriers a competitive advantage over other Carriers or groups of Carriers.
 - The NPA relief plan chosen should seek to minimize consumer confusion while balancing the cost of relief implementation by all affected parties.
 - If a relief plan requires customers to undergo number changes, the plan should not require these customers to undergo further number changes until at least 8-10 years later.
 - It is the responsibility of all participants (e.g. Carriers, Service Providers, equipment suppliers, and end-users) to implement the approved NPA relief plan.
 - Communication should be established with all affected industry members, and maintained throughout the planning process.

Question: *Do you agree with the stated NPA relief planning principles and considerations?*

9. ROLES & RESPONSIBILITIES FOR RELIEF PLANNING

Establishment of a Relief Planning Committee (RPC)

- 9.1** Relief Planning is based on the Projected Exhaust Date (PED) of NPA 876 as identified in the Initial Planning Document.
- 9.2** The OUR proposes that Relief Planning be coordinated by a Relief Planning Committee (RPC), which is to be an ad-hoc working group established by the OUR. The RPC is to be opened to broad industry participation and operate under set guidelines, and be established solely for the relief of NPA 876.
- 9.3** The following principles should guide the operation of the RPC:
- a) Meetings should be conducted in an open fair and impartial manner in order to ensure that all participants have an opportunity to express their opinions.
 - b) All information relating to the RPC meetings should be publicly accessible in a timely manner.
 - c) The RPC should endeavour to reach consensus on its recommendations and documents.
 - d) The RPC should seek a reasonable balance among the economic, technical and social impacts of relief implementation.

Roles and Responsibilities of the RPC

- 9.4** The following are proposed as major roles and responsibilities of the RPC:
- a) Coordinate the development of the final Planning Documents and propose the Relief Date, for approval by the OUR;
 - b) If the Projected Exhaust Date changes, because of changes in any of the determining factors, after the relief date has been approved by the OUR, or if other reasons suggest that a change of the relief date is prudent and necessary, then the RPC should be authorized recommend that the OUR change the Relief Date.
 - c) Establish NPA Relief Implementation Task Forces where required to plan and complete significant implementation tasks;

- d) Finalize the Relief Implementation Plan (including a Relief Implementation Schedule; Consumer Awareness Program and Network Implementation Plan);
- e) Review relevant industry developments occurring after the OUR has approved a Relief Date, and, if necessary, recommend to the OUR that the Relief Date be changed;
- f) Monitor relief implementation and take whatever action may be necessary to implement relief in accordance with OUR Decisions or Directives;
- g) Ensure that CO Codes are always available for assignment to Carriers and Service Providers so that telephone numbers will continue to be available during relief planning and implementation;
- h) Prepare the RPC Progress Reports for the OUR in accordance with the Relief Implementation Plan.

Roles and Responsibilities of the OUR

9.5 The OUR should assume the following three roles with regards to the Relief Planning Committee:

- 1) The RPC Chair - to convene, chair and facilitate RPC meetings;
- 2) The RPC Secretary - to provide secretarial support to the RPC and,
- 3) The RPC Coordinator (the Relief Planner) – to create Planning Documents as agreed by the RPC, including the Planning Letter to be posted on the NANPA website.

9.6 The OUR should have the following additional responsibilities in the planning process:

- a) Monitoring the rate of assignment and in-service confirmations of CO Codes within NPA 876 in order to assist in the identification of a Jeopardy Condition.
- b) Ensuring that all CO Codes (NXXs) in NPA 876 are accounted for and that the records are up-to-date.
- c) Developing the Second Planning Document SPD to be used as the baseline document for the development of the RIP which will be finalized by the RPC.

- d) Documenting the Relief Planning activities, and making the information available on the OUR website in a timely manner.
- e) Declaring and providing notification of a Jeopardy Condition and working with the RPC to develop a Jeopardy Contingency Plan (JCP) to be approved by the OUR.
- f) Verifying with NANPA that the reserved relief NPA is still allocated to Jamaica for the relief of NPA 876
- g) Making a determination on one of the proposed Relief Options in the SPD.
- h) Requesting and obtaining the assignment of the Relief NPA from NANPA after the finalization of the RIP.
- i) Submit Planning Letter (PL) to the NANPA (The PL is an informational letter to be prepared by the OUR and published by the NANPA to advise the telecommunications industry of the introduction of a new area code and/or other relief information.
- j) Publishing the Planning documents to the OUR website at www.our.org.jm

Responsibilities of Carriers and Service Providers

9.7 The Carriers and Service Providers should have the following responsibilities in the planning process:

- a) Participate in the RPC, and the task forces (CATF and NITF)
- b) Review the SPD developed by the OUR;
- c) Participate in the development of the RIP and FPD by providing comments and identifying impacts on stakeholders;
- d) Participate in developing a Jeopardy Plan and any associated NRUF for use if a Jeopardy Condition is declared by the OUR.
- e) CO Code Holders should ensure that all CO Codes (NXXs) assigned to them in NPA 876 are accounted for and that the records are up-to-date. CO Code Holders should also provide any other information to the OUR as necessary and in a timely manner to assist the OUR in reconciling and validating the status of all CO Codes within NPA 876.
- f) Implement the Jeopardy Plan measures when required.

- g) Take the actions (network and other systems changes, testing, consumer awareness activities, etc.) required to implement relief by the dates contained in the Relief Implementation Plan.
- h) Notify the OUR of any major relief implementation or consumer awareness concerns as they are identified. Any concerns that may impact the implementation of relief by other Carriers and Service Providers should also be identified to the RPC or the relevant task forces, as appropriate.

10. PROPOSED NPA RELIEF IMPLEMENTATION TASK FORCES

- 10.1** Section 8 (3)(f) of the Telecoms Act obligates the OUR, in its development of the National Numbering Plan, initially, and subsequently, to take care that costs or inconvenience to customers are objectively justified and kept to the minimum consistent with meeting demands for numbers and sound management of the Numbering Plan.
- 10.2** The cost implications for an NPA relief were outlined in section 6 of this document. The expression of concern for such probable outcomes is universally common, and warrants careful consideration in this relief exercise. Importantly, the key to success in these cases has been the time-honoured principle: careful planning and timing, coupled with sound public education.
- 10.3** Much of the burden of NPA relief, of course, rests with carriers and service providers. This not only in terms of customer education efforts, but also so in terms of network provisioning and testing (locally and internationally) which require careful industry cooperation and coordination.
- 10.4** The OUR therefore proposes the establishment of at least two NPA relief implementation task forces to ensure a seamless introduction of the new NPA and the minimization of costs an inconvenience to the industry in general. These are:
1. Consumer Awareness Task Force
 2. Network Implementation Task Force
- 10.5** The establishment of the task forces should be administered by Relief Planning Committee.

Consumer Awareness Task Force (CATF)

Purpose

- 10.6** The purpose of the Consumer Awareness Task Force (CATF) is to develop and implement a comprehensive and consistent consumer awareness program (CAP) for the NPA 876' relief activities.

CATF Membership

- 10.7** All licensed Telecommunications Carriers and Service Providers who currently hold and utilise NPA 876 numbering resources for the provision of telecommunications services to the public should provide a representative to serve on the CATF. The OUR is to be represented by its Consumer Affairs Department.

Roles and Responsibilities

10.8 The responsibilities of the CATF should, inter alia, be to:

- 1) Develop and agree on a CAP and schedule;
- 2) Implement the CAP in accordance with the agreed schedule
- 3) Identify and address new CAP issues;
- 4) Act as a single point of contact on CAP issues; and,
- 5) Identify any consumer concerns or issues regarding the implementation of the relief and advise the RPC or the OUR, as appropriate;
- 6) Develop and submit progress reports to the RPC.

10.9 The role of the individual CATF representatives of the Carriers and Service Providers (CSPs) and the OUR is to ensure that their organization develops, submits and implements its individual consumer awareness program in accordance with the CAP and associated schedule. Each representative should act as the single point of contact with respect to implementation of the CAP and activities for the organization. Each Carrier and Service Provider should be responsible for developing, submitting and implementing its individual consumer awareness program in accordance with the industry level CAP.

10.10 All CSPs should provide progress reports to the CATF for submission to the RPC in accordance with the Relief Implementation Schedule. Individual CSPs should notify the CATF, or the OUR, as appropriate, if there are any problems or concerns with respect to their individual consumer awareness program activities to implement the relief in accordance with the Relief Implementation Plan.

10.11 The OUR proposes that the CATF be Co-chaired by one of the CSPs' representatives and the OUR's representative. The Co-chairs of the CATF should compile and maintain a list of all representatives on the CATF (i.e., contact name, company name, telephone number, fax number, and e-mail address).

Network Implementation Task Force (NITF)

Purpose

10.12 The purpose of the Network Implementation Task Force (NITF) is to develop a Network Implementation Plan (NIP) for the '876' relief activities

NITF Membership

10.13 All licensed Telecommunications Operators who currently route calls over their networks using NPA 876 numbering resources in the provision of telecommunications services should provide a representative to serve on the NITF. The OUR is to be represented by its Regulation, policy, Monitoring and Enforcement Department.

Roles and Responsibilities

10.14 The responsibilities of the NITF should, inter alia, be to:

- 1) Develop and agree on a Network Implementation Plan (NIP) and schedule;
- 2) Implement the NITF in accordance with the agreed schedule;
- 3) Identify and address new NIP issues;
- 4) Act as single point of contact on NIP issues;
- 5) Identify any network concerns or issues regarding the implementation of relief and advise the RPC, the OUR as appropriate; and,
- 6) Develop inter-network test plans, as necessary.
- 7) Develop and submit progress reports.

10.15 The role of the individual NITF representatives of each Operator and the OUR is to ensure that their organization develops, submits and implements its individual network implementation plan in accordance with the NIP and associated schedule. Each representative should act as the single point of contact for implementation of the NIP and activities for its organization. Each operator is responsible to develop, submit and implement its individual network implementation plan in accordance with the industry level NIP.

10.16 Test plans and tests should be arranged on a bilateral basis between interconnecting Carriers in accordance with bilateral agreements and the Relief Implementation Schedule. All Operators should provide progress reports to the NITF for submission to the RPC in accordance with the Relief Implementation Schedule.

10.17 Individual Operators and industry database owners/operators (e.g., a Number Portability Administrator) should notify the NITF, or the OUR, as appropriate, if there are any problems or concerns with modifying their systems and databases in time to implement relief in accordance with this RIP.

10.18 The OUR proposes that the NITF be Co-chaired by one of the Operators' representatives and the OUR's representative. The Co-chairs of the NITF should compile and maintain a list of all representatives on the NITF (i.e., contact name, company name, telephone number, fax number, and e-mail address)

Question: *Do you agree with the proposed relief planning Roles and Responsibilities?*

Question: *Do you agree with the proposed composition, roles and responsibilities for the Relief Implementation Task Forces?*

11. PROPOSED NPA RELIEF IMPLEMENTATION SCHEDULE

11.1 The proposed Relief Implementation Schedule in Table 11.1 identifies Relief Planning activities for the development of the Planning Document and the Relief Implementation Plan (RIP), as well as major activities and deliverables for the implementation of relief. The detailed schedule is to be completed by the RPC. All CSPs and telecommunications service users should plan their internal relief activities in accordance with the Relief Implementation Schedule.

Table 11.1: Proposed NPA Relief Implementation Schedule

Item	Task or Event	PRIME	START	END
1	OUR identifies NPA exhaust and notifies the local industry and NANPA that the NPA will exhaust within the future six year time period	OUR		
3	OUR conducts industry Consultation regarding the second phase of the NPA Relief Process	OUR		
4	OUR issues Determination on NPA Relief Plan	OUR		
5	Initial RPC meeting to review NPA Relief Plan continue development of the RIP, schedules future meetings including creation and consultation with CATF and NITF	RPC		
6	Subsequent RPC meetings to finalize RIP	RPC		
7	Contact special types of telecommunications service users (alarm companies, ISPs, etc.) to identify any concerns to RPC	Special Users		
8	RPC forwards RIP to the OUR for approval	RPC		
9	OUR issues Decision approving Relief Date and Relief Implementation Plan (RIP) and Requests assignment of new NPA by the NANPA	OUR		

Item	Task or Event	PRIME	START	END
10	All CSPs to develop and file individual consumer awareness programs with the RPC (starts upon OUR approval of RIP)	CSPs		
11	OUR issues media release (in coordination with CSPs) (may start upon OUR approval of RIP and should be issued well before the Relief Date)	OUR		
12	OUR submits PL and RIP to the NANPA (should be submitted well before the Relief Date)	OUR		
13	The NANPA receives and posts Planning Letter to NANPA website (within 2 weeks of receipt from the OUR)	NANPA		
14	Task Forces, CSPs and users implement relief (starts upon CRTC approval of RIP and ends on the Relief Date)	Task Forces, CSPs & Users		
15	All CSPs implement consumer awareness activities (starts upon filing of Consumer Awareness Programs with the RPCC and is completed on the Relief Date)	CSPs		
16	All TSPs to notify all customers (including residence, business & special customers) of the new NPA and dialling arrangement (may start upon the filing of Consumer Awareness Programs with the RPC and all customers should be notified well before the Relief Date)	CSPs		
17	CSPs to submit Progress Report #1 to NITF and CATF	CSPs		
18	NITF and CATF develop & submit Progress Report #1 to RPC (linked to CSP reports to NITF and CATF)	NITF & CATF		

Item	Task or Event	PRIME	START	END
19	RPC submits Progress Report #1 to the OUR (linked to NITF and CATF reports)	RPC		
20	Telcordia TRA database updates to add Exchanges to new NPA (starts on the date that the PL is posted to the NANPA web site and must be completed prior to the Relief Date)	Telcordia TRA		
21	All telecommunications service users (including alarm companies, ISPs, etc.) to implement changes to their telecom equipment and systems to accommodate the new NPA and dialling format (starts upon CRTC approval of RIP and ends on the Relief Date)	Telecom Service Users		
22	CSPs and database owners/operators to modify systems and industry databases (starts upon CRTC approval of RIP and ends on the Relief Date)	CSPs & Database Owners/ Operators		
23	Operator Services and Directory Assistance Readiness (starts upon CRTC approval of RIP and ends on the Relief Date)	CSPs		
24	Directory Publisher Readiness for an overlay (ability to identify the NPA in telephone numbers in the directory published after an Overlay NPA is activated) (starts upon CRTC approval of RIP and ends on the Relief Date)	Directory Publishers		
25	Service Order Systems Readiness (starts upon CRTC approval of RIP and ends on the Relief Date)	TSPs		
26	International Gateway Switch Translations Readiness for new NPA (starts upon CRTC approval of RIP and ends on the Relief Date)	Int'l CSPs		

Item	Task or Event	PRIME	START	END
27	CSPs apply for Test CO Codes in new NPA (applications may be submitted no less than 66 days prior to the start date for the Inter-Carrier testing period)	CSPs		
28	Develop Inter-Carrier Network Test Plans and prepare for testing (individual CSPs to make arrangements in accordance with interconnection agreements) (may start upon CRTC approval of RIP and must be completed by start date for the Inter-Carrier Testing Period)	NITF & CSPs		
29	All international and domestic Telecommunications Service Providers (TSPs) must activate the new NPA in their networks by the start date for the Inter-Carrier Testing Period	CSPs		
30	Activation date for Overlay NPA Test CO Codes and Test Numbers in network (should be completed by the start date for the Inter-Carrier Testing Period)	CSPs		
31	Inter-Carrier Testing Period (subject to Inter-Carrier Network Test Plans) (starts about 3 months prior to the Relief Date, and ends about 1 month after the Relief Date)	NITF & TSPs		
32	CSPs to submit Progress Report #2 to NITF and CATF (starts on commencement of Inter-Carrier Testing Period)	CSPs		
33	NITF and CATF develop & submit Progress Report #2 to RPC (linked to CSP reports to NITF and CATF)	NITF & CATF		
34	RPC submits Progress Report #2 to the OUR (linked to NITF and CATF reports)	RPC		
35	Relief Date (earliest date when CO Codes in			

Item	Task or Event	PRIME	START	END
	new NPA may be activated)			
36	CSPs submit Final Report to CATF and NITF (starts on Relief Date and provides 2 weeks for preparation & submission)	CSPs		
37	NITF and CATF develop & submit Final Progress Report to RPC (linked to CSP reports to NITF and CATF)	NITF & CATF		
38	RPC submits Final Progress Report to the OUR (linked to NITF and CATF reports)	RPC		
39	CSPs disconnect Test Codes & Numbers, and return Test Codes to the OUR (starts 1 month after Relief Date and allows 1 month for completion)	CSPs		

Question: *Do you agree with the proposed Relief Implementation Schedule? If not, please give reasons and suggest alternative approaches, etc.*

END OF DOCUMENT