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IDAHO PUBLIC
UTILITIES COMMISSION

Via Overnight Courier

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83720

GNR-T-15-06

Re: In the Matter of the Application for Modified Procedures of Neustar, Inc.,
on behalf of the Idaho Telecommunications Industry, For Approval of
NPA Relief Plan for the 208 NPA

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of the Application for Modified Procedure of Neustar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA") and on behalf of the telecommunications industry.

Also enclosed are an original and seven (7) copies of the Petition for Admission of Attorney *Pro Hac Vice* of Kimberly Wheeler Miller.

If you have any questions regarding these filings, please do not hesitate to contact me at (202) 533-2912.

Respectfully submitted,



Kimberly Wheeler Miller
Counsel, North American Numbering
Plan Administrator, Neustar, Inc.
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Local Counsel

**Before the
IDAHO PUBLIC UTILITIES COMMISSION
Boise, Idaho 83702**

In the Matter of the Application for Modified)
Procedures of Neustar, Inc., on Behalf of the Idaho)
Telecommunications Industry, For Approval of)
NPA Relief Plan for the 208 NPA)

Case No. GNR-T-15-06

**APPLICATION FOR MODIFIED PROCEDURES
OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE IDAHO TELECOMMUNICATIONS INDUSTRY
FOR RELIEF OF THE 208 NPA**

Neustar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Idaho under the North American Numbering Plan and on behalf of the Idaho telecommunications industry (“Industry”),¹ applies to the Idaho Public Utilities Commission (“Commission”)² to approve the

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 208 area code of Idaho.

² The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19.

Industry's consensus decision³ to recommend to the Commission an all services distributed overlay (referred to as Alternative #1) of the 208 numbering plan area ("NPA") as the preferred form of relief for the 208 NPA.⁴ The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 208 NPA will exhaust during the second quarter of 2018.⁵ In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 208 NPA and to fully implement customer education plans, the Industry recommends that the Commission approve the recommended 16-month implementation schedule if the Commission approves the overlay alternative. In support of this application and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

The April 2015 NRUF Report indicates that the 208 NPA is projected to exhaust during the second quarter of 2018. Due to the projected exhaust, NANPA notified the Industry on April 14, 2015 that NPA relief needed to be addressed.⁶ The Industry met via

³ Consensus as used in this document means: 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. Operating Procedures for ATIS Forums and Committees, §7.1 (ATIS Feb. 22, 2012).

⁴ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

⁵ 2015-1 NRUF and NPA Exhaust Analysis (April 2015) ("April 2015 NRUF Report"). The April 2015 NRUF Report can be accessed at <http://www.NANPA.com>.

⁶ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061, Sept. 5, 2014) ("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 web site located at <http://www.atis.org/inc/incguides.asp>.

conference call on June 9, 2015 to discuss various relief alternatives.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting. The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of an all-services distributed overlay relief alternative and a geographic split alternative.⁸ No additional relief alternatives were introduced by Industry members before or during the June 9 meeting.

During the relief planning meeting, the Industry members evaluated the two relief alternatives, described more fully below:

- **Alternative #1 – All Services Distributed Overlay:** A new NPA code would be assigned to the same geographic area as the existing 208 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas. Alternative #1 has a projected life of 66 years.
- **Alternative #2 – Geographic Split:** In a geographic split, the NPA is split into two or more geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans require ten-digit dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted. In Alternative #2, the proposed boundary line would run along rate center boundaries starting at the Oregon border between Riggins and New Meadows rate centers and continues east and then turn southward ending at the Nevada border between the

⁷ A copy of the June 9 meeting minutes, including a list of attendees, is attached as Exhibit A.

⁸ A copy of the IPD, including maps of both relief alternatives, is attached as Exhibit B.

Three Creek and Oakley rate centers. The area north and east of the boundary line is labeled as Area A and the southwestern portion is labeled as Area B. Area A has a projected life of 68 years and Area B has a projected life of 65 years. No recommendation is made regarding which side of the split line should receive the new NPA.

At the June 9, 2015 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend that the Commission adopt Alternative #1, the all-services overlay.

II. DESCRIPTION OF THE RECOMMENDED RELIEF ALTERNATIVE

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 208 NPA. All existing customers would retain the 208 area code and would not have to change their telephone numbers. The projected life of the overlay is 66 years. Consistent with FCC regulations, customers will dial 10 digits for all local calls.⁹

The table below sets forth the Industry recommended dialing plan for Alternative #1:

Overlay Dialing Plan for Alternative # 1:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services	HNPA or FNPA	0+10-digits (0+NPA-NXX-XXXX)

Industry participants reached consensus to recommend to the Commission a 16-month schedule for implementation of the overlay. The recommended schedule is as follows:

⁹ 47 C.F.R. §52.19(c)(3)(ii).

Implementation Schedule for Alternative # 1 – Overlay

EVENT	TIMEFRAME	DATE
Total Implementation Period	16 months	-
Start Network Preparation and Customer Education	6 months	TBD
Start of Permissive 7-digit and 10-Digit Dialing Period <i>(Calls within 208 NPA can be dialed using 7 or 10 digits)</i> and continued Customer Education	9 months	TBD
Mandatory dialing at the end of Permissive Dialing Period during 4Q2017	-	TBD
First Code Activation after end of Permissive dialing period. <i>(Effective date for codes from the new NPA)</i>	1 month	TBD

The Industry requests that the Commission approve this timeline in order to ensure the timely implementation of relief and to facilitate customer education.

III. REQUEST FOR MODIFIED PROCEDURE

A hearing is not necessary to consider the matters presented herein and request that this Application be processed by Modified Procedure.

IV. CONCLUSION

The Industry respectfully requests that the Commission enter an order approving Modified Procedure and the Commission enter an order approving the Industry's recommended method and schedule for relief for the 208 NPA.

Respectfully submitted,



Kimberly Wheeler Miller
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North American Numbering Plan Administrator
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Sterling, VA 20166
(571) 434-5690
Joe.cocke@neustar.biz

July 20, 2015

EXHIBIT A



July 7, 2015

To: All 208 NPA Code Holders and Other Industry Members (Idaho)

Subject: Final Minutes of June 9, 2015 IPD Conference Call

Attached are the final meeting minutes from the June 9, 2015, ID 208 NPA relief planning meeting. NANPA conducted a conference call to review and approve these minutes on July 7, 2015 and no changes were made. No later than July 21, 2015, NANPA will file the petition for relief of the 208 NPA using the meeting results reflected in these minutes.

Please feel free to contact me if you have any questions regarding any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on 571-434-5690 or via email at the address below.

Sincerely,

Joseph R. Cocke
Senior NPA Relief Planner
NANPA
e-mail: joe.cocke@neustar.biz

CC: Carolee Hall – IPUC Staff
Attachments

**IDAHO – 208 NPA
RELIEF PLANNING IPD
FINAL -MEETING MINUTES
June 9, 2015**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Joe Cocke, Senior NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned there would be a quality survey sent via email to those attending today's call. Joe then reviewed the agenda and NANPA's roles and responsibilities.

NANPA's ROLE AND RESPONSIBILITIES

Joe reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA – Initial Relief Planning notice was sent April 14, 2015.
- Facilitate a Pre-IPD conference call with the industry six weeks prior to the NPA Relief Planning meeting – held May 12, 2015.
- Distribute the Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting – posted on NNS May 12, 2015; (reminder posted June 2, 2015).
- Review the relief alternatives presented in the IPD
- Check to see if there are any additional relief alternatives from the participants
- Discuss the alternatives and consider pros and cons for each alternative.
- Then, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the Idaho Public Utilities Commission (PUC).
- Also determine any additional items to include in a filing with the PUC such as dialing plan and implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting per the INC guidelines or as decided by the industry or as required by the state statute.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Joe stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Joe 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.

Joe referred the participants to the three relief planning meeting aids included in the IPD document: the Excerpts from the INC NPA Code Relief Planning and Notification Guidelines, Appendices B and E, the collection of industry developed Pros and Cons of relief alternatives and the Implementation Interval and Dialing Plan charts. These meeting aids will assist the participants in their decision making and to make a recommendation for relief.

The Relief Planning, as well as other relevant CO Code, NPA assignment guidelines, may be downloaded from the ATIS web site at: (www.atis.org).

PRE-IPD CONFERENCE CALL RE-CAP

Joe provided a recap of the pre-IPD conference call held May 12, 2015, for the purpose of reviewing the NANPA developed proposed relief alternatives; no additional relief alternatives were recommended during that call or prior to the call today. Informal meeting notes resulting from the pre-IPD industry conference were posted to NANPA's NNS service on May 12, 2015. Joe noted the main purpose of that call was to obtain additional relief alternatives for consideration; even though none was suggested the industry will still have the opportunity to propose additional relief alternatives during the call today.

NPA STATUS

Joe informed participants that the April 24, 2015 Number Resource Utilization Forecast ("NRUF") projects the 208 NPA to exhaust during the 2nd Quarter 2018. The monthly CO Code demand projection is 1 code/month or twelve per year.

Joe provided a read-out of the monthly CO Code Assignment Activity for the Idaho 208 NPA. He reported as of June 9, 2015 there were 40 NXX codes available for assignment, there have been eight codes assigned year to date, 743 total assigned NXX codes, and 17 unavailable NXX codes which are as follows: Eight N11s, and the other standard UAs, 208, 307, 555, 700, 950, 958, 959, 976 and 986. There are 67 service provider OCNs that are code holders.

NUMBER POOLING INFORMATION

Cecilia McCabe, Neustar – Number Pooling Implementation, reported for the 208 NPA that pooling commenced on August 26, 2002, there are 145 rate centers (RCs), 94 RCs are mandatory pooling and 51 rate centers are mandatory pooling with only a single-service provider and no optional or excluded rate centers. In the past twelve months, from June 1, 2014 to June 8, 2015, 265 blocks have been assigned in the 208 NPA, and as of 6/8/15 there are 1002 blocks available for assignment to service providers. Pooling has assigned 18 codes in the past twelve months, all for pool replenishment, 0 for dedicated customers and 0 for LRN. The forecasted need for the next twelve months is 65 codes - 65 for pool replenishment and dedicated customers and none for LRNs. Joe noted there are a few service providers that have forecasted the need for codes in multiple rate centers across the state causing the need for so many new codes.

EXPLANATION OF RELIEF ALTERNATIVES PREPARED BY NANPA

Joe provided an overview of the 208 area code in general describing the geography and assisting the industry in familiarizing itself with the area. He also described the rate area maps that have been prepared for reference. Idaho is unique in that it is one of twelve remaining states that have only one NPA.

General Facts:

Joe provided the highlights of the general facts in the IPD on Idaho and the 208 NPA. The state has a population of over 1.6 million people in 44 counties with 200 incorporated cities and encompasses 83,557 square miles. This state is renowned for its scenic beauty, unlimited opportunities for recreation, of summer and winter outdoor activities enjoyed year-round by national and international vacationers.

The 208 area code or numbering plan area (NPA) was created in 1947 as the original area code for Idaho. The entire state of Idaho has only one area code. The 208 NPA serves this state with a mix of large and small cities and towns including very rural lightly inhabited areas of the state. The 208 NPA is bordered on the north by the British Columbia, Canada 236/250/778 NPA overlay complex, to the west by the Washington 509 NPA and the Oregon 541/458 NPA overlay complex, to the east by the Montana 406 NPA and the Wyoming 307 NPA and to south by the Nevada 775 NPA and the Utah 435 NPA. Additionally, the 208 area code is home to residents, businesses, government centers, airports, hospitals, colleges and universities, museums, cultural and entertainment centers, as well the Mountain Home Air Force Base and the Fort Hall, Duck Valley, Nez Perce, and Coeur d'Alene Indian Reservations.

Joe then briefly reviewed Appendix E to the NPA Code Relief Planning Guidelines which provides the General Attributes of Common Relief Alternatives. The following maps and related documents were then reviewed:

- 2014 State Census data by city and county
- Map showing location of the one NPA in Idaho
- NPA 208 Rate Center Map of the 145 rate centers
- NPA 208 map of Rate Centers, Counties & Cities and communities
- NPA 208 Rate Center, LATA map showing the 5 LATAs
- Rate Center Table
- Code Holder Table

Then Joe reviewed the following relief alternatives in the Initial Planning Document:

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 208 NPA. Customers would retain their current telephone numbers; however, ten-digit dialing for all local calls by all customers within and between NPAs in the affected area would be required. Central Office codes in the overlay NPA will be assigned upon request with the effective date of the new area code with a projected life of 66 years. At exhaust of the 208 NPA all future CO code assignments will be made in the overlay area code.

Total CO Codes = 741
Total rate centers = 145
Area Code Life = 66 Years

GEOGRAPHIC SPLIT ALTERNATIVE

Joe explained that in a geographic split a line is drawn along rate center boundaries of the current area code with rate centers on one side of the split line retaining the current area code and the rate centers of the other side of the split line changing to a new area code. Telephone numbers on both sides of the split line will retain seven-digit dialing. Local calls dialed between the two resulting area codes will be on a 10-digit basis.

Joe further explained that according to the INC guidelines, if a geographic split is considered, severe imbalances of more than ten years in NPA lifetimes are to be avoided. Also the side of the split line that changes to the new NPA shall have a projected life of at least 8 to 10 years before projected to exhaust. Relief options shall cover a period of at least five years beyond the predicted date of exhaust.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 208 area code is split by drawing a line along rate center boundaries as follows: The line starts at the Oregon border at the NPA boundary between the Riggins and New Meadows rate centers and follows the southern border of Riggins, Warren and Elk City rate Centers, then continues southerly on the eastern side of the Yellowpine and Lowman and Atlanta rate centers, then continues following along the southern border of the Stanley rate center then continues along the northern borders of Ketchum and Carey rate centers then continues between Carey and Arco rate centers then southerly between Richfield and Minidoka rate centers and then follows the eastern border of Twin Falls rate center then between Three Creek and Oakley rate centers and continues to the edge of the 208 NPA boundary at the Nevada border. The area inside this split line is labeled AREA B with a projected life of 65 years; the rest of the 208 NPA is labeled AREA A with a projected life of 68 years. This split line along rate center boundaries approximately follows many but not all of the county lines involved. Rate center boundaries do not follow jurisdictional boundaries. This split alternative is well balanced with only three years difference in projected lives. No recommendation is made for which side of the split line would receive the new NPA.

The forty-five rate centers inside Area B are as follows: Atlanta, Boise, Boise River, Bruneau, Caldwell, Cambridge, Carey, Cascade, Council, Donnelly, Emmett, Fairfield, Filer, Fruitland, Garden Valley, Grand View, Grasmere Riddle, Hollister, Homedale, Horseshoe Bend, Indian Valley, Ketchum, Lowman, Marsing, McCall, Melba, Midvale, Mountain Home, NAMPA, New Meadows, New Plymouth, Nu Acres, Parma, Payette, Prairie, Richfield, South Mountain, Sweet, Three Creek, Tipanuk, Twin Falls, Warm Lake, Weiser, Wilder and Yellowpine. The remaining one hundred rate centers are in Area A.

Area A
Total CO Codes = 368
Total rate centers = 100
Area Code Life = 68 Years

Area B
Total CO Codes = 373
Total rate centers = 45
Area Code Life = 65 Years

ADDITIONAL RELIEF ALTERNATIVE SUGGESTIONS

Joe sought ideas for additional alternatives or suggestions to alter the existing alternative. There were no additional suggestions during this conference call.

CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION

Joe sought a discussion from the industry members regarding the use of comparing the Pros and Cons of the relief alternatives. While the Pros and Cons are in the meeting invitation material, it was decided by the participants that use of the industry developed Pros and Cons was not necessary for this relief project.

After further discussion, a proposal was made and consensus was reached to recommend Alternative #1, the all services distributed overlay, to the Idaho Public Utilities Commission ("PUC") as the industry's choice of relief for the 208 NPA.

STATEMENTS FOR THE RECORD:

Carolee Hall of the Idaho PUC staff provided the following statement: *The Idaho Public Utilities Commission supports an overlay. Overlay will be the Commission's position as it comports with the industry's (Best Practices) recommendation to the North American Numbering Council and was accepted by the FCC as a state's option to choose the best means of implementing area code relief for its citizens. (FCC Order DA 14-842).*

DIALING PLAN (ALTERNATIVE # 1)

The following represents the dialing plan for an overlay in Idaho:

Overlay Dialing Plan for Alternative # 1:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services	HNPA or FNPA	0+10-digits (0+NPA-NXX-XXXX)

ESTABLISH IMPLEMENTATION SCHEDULE

Joe noted that the start of mandatory dialing should avoid major holiday periods such as Thanksgiving, Christmas and New Year's. Interval dates, start of permissive dialing and mandatory dialing, will occur during non-business hours, usually early Saturday mornings.

IMPLEMENTATION ISSUES

Joe stated the industry members should consider the time of the year when best to introduce a dialing change in the Idaho as well as the length of time they would recommend for permissive dialing due to this being the first NPA relief for the state. Joe suggested they give serious consideration as to what time of the year a dialing change should be introduced and the length of permissive dialing in order to minimize the impacts to the 208 NPA. In addition to avoiding major holidays, there is the tourism industry as well as annual weather issues to consider. In connection with this issue, the INC guidelines state that NANPA should recommend mandatory dialing start 6-months prior to the forecasted exhaust of the 208 NPA, which would be in 4Q2017.

Due to the high projected demand at the pooling administration level, there is the potential change in the forecasted exhaust, which may require any implementation dates to be moved in before the forecasted exhaust. Therefore, the participants decided to wait on identifying specific implementation interval dates until after the PUC issues an order and the implementation meeting has been scheduled. At that time the projected demand at the pooling level may have changed.

A recommendation was made and consensus reached to recommend to the Commission a 16-month schedule for implementation of the overlay with a 6-month network preparation and customer education period, followed by a 9-month permissive dialing period, then a one month quiet period before the effective date of the new NPA. The recommended schedule is as follows:

Interval Timeframes and Dates for Alternative # 1 – Overlay:

EVENT	PERIOD	DATE
Total Implementation Period	16 Months	-
Start Network Preparation and Customer Education	6 Months	TBD
Start of Permissive 7-digit and 10-digit Dialing Period <i>(Calls within 208 NPA can be dialed using 7-digits or 10 digits)</i> and Continued Customer Education	9 Months	TBD
Mandatory Dialing at the end of Permissive dialing period during 4Q2017.	-	TBD
First Code Activation after end of Permissive dialing period. <i>(Effective date for codes from the new NPA)</i>	1 Month	TBD

CUSTOMER EDUCATION PLAN

It was agreed the industry team will work together on a coordinated education plan across the state.

REVIEW OF DRAFT MEETING MINUTES

Joe stated that the draft minutes resulting from this meeting will be distributed to the industry via the NANPA's Notification Service (NNS) no later than June 23, 2015 and the draft commission filing distributed to the industry no later than June 30, 2015.

It was agreed that NANPA will conduct a conference call to review and approve the draft minutes and approve the draft petition to the Idaho Public Utilities Commission on July 7, 2015. Joe will include the conference call bridge information with the invitation to the July 7th meeting when the draft minutes are distributed. NANPA will file the relief petition with the Idaho PUC no later than July 21, 2015.

OPEN DISCUSSION

One of the participants asked the PUC how soon a decision could be expected if the petition was filed in July. The PUC representative responded that a decision might be provided as early as August.

Adjourned

#

These minutes became final with no changes made on July 7, 2015.

**208 NPA – IDAHO
IPD Meeting
VIA CONFERENCE CALL
JUNE 9, 2015
PARTICIPANTS**

Attachment 1

NAME	COMPANY
Kyle Bradshaw	ATC
Dan Morris	Cambridge
Kristie Kanady	Cambridge
Margaret Cox	CenturyLink
Rita Schmitz	CenturyLink
Mike Potts	CenturyLink
Chris Brown	Cox Telecom
Sandra Jones	Cox Telecom
J.D. Bennetts	Custer Tel
Jeness Butterfield	Custer Tel
Daniel Greig	Farmers Mutual
Steve Cowger	Filer Mutual
Gary Earl	Filer Mutual
Ellen Washbon	Frontier
Carolee Hall	ID PUC
Jeanne Bell	Integra Telecom
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA
Linda Hymans	NeuStar Pooling
Cecilia McCabe	NeuStar Pooling Implementation
Michelle Motzkus	SilverStar Tel
Karen Riepenkroger	Sprint
Shaunna Forshee	Sprint
Paula Jordan Campagnoli	T-Mobile
Kyeva Keith	T-Mobile
Anne Chism	TDS
Yun Lee	Verizon
Dana Crandall	Verizon Wireless
Nicole Winters	Windstream

EXHIBIT B

Initial Planning Document

For

Relief of Idaho 208 NPA

June 9, 2015

North American Numbering Plan Administration

Joseph R. Cocke
Sr. NPA Relief Planner

208 NPA Background Information

General Facts:

Idaho became the 43rd state on July 3, 1890. It has a population of over 1.6 million people in 44 counties with 200 incorporated cities and encompasses 83,557 square miles. Bordering states are: Washington and Oregon to the west, Montana and Wyoming to the east, Nevada and Utah to the south and bordering Canada to the north. The state capital is Boise, the state flower is the Syringa, the state gemstone is the Star Garnet, the state horse is the Appaloosa, the state bird is the Mountain Bluebird and the state fish is the Cutthroat Trout. This state is an undiscovered land of unparalleled beauty – massive mountain ranges, great lava flows, deep canyons, large wilderness areas with deserts, prairies, forests rich with wildlife, spectacular mountain vistas and some of the world's most wild and scenic rivers and over 2000 pristine mountain lakes. The opportunities for recreation, of fishing, hiking, hunting, skiing and other outdoor activities are enjoyed year-round by national and international vacationers. It has eleven national forests, 25 state parks, 93,000 miles of rivers and forty percent of the 53 million acres is covered by trees. Known as the Gem State – over 80 varieties of gemstones are found here. The state shaped like an 'h', played a key role in Lewis and Clark's historic trek to find a northwest passage. Before the settlers, five Native American tribes called Idaho home.

The 208 area code or numbering plan area (NPA) was created in 1947 as the original area code for Idaho. The entire state of Idaho has only one area code. The 208 NPA serves this state with a mix of cities, suburban cities and towns with residential, commercial and light industrial areas with varied growth, rural towns, vacation and tourist areas as well as very rural uninhabited areas of the state. The 208 NPA is bordered on the north by the British Columbia, Canada 236/250/778 NPA overlay complex, to the west by the Washington 509 NPA and the Oregon 541/458 NPA overlay complex, to the east by the Montana 406 NPA and the Wyoming 307 NPA and to south by the Nevada 775 NPA and the Utah 435 NPA.

Additionally, the 208 area code is home to residents, businesses, government centers, airports, hospitals, colleges and universities, museums, cultural and entertainment centers, as well the Mountain Home Air Force Base and the Fort Hall, Duck Valley, Nez Perce, and Coeur d'Alene Indian Reservations.

Relief Planning Background and Assumptions:

The 208 NPA has 145 rate centers of which all are in mandatory Thousand-Block-Number Pooling, which started August 26, 2002. There are 51 rate centers that have a single service provider, and 79 rate centers that have only one central office code. The 208 NPA serves LATAs 648, 652, 654, 676 and 960, but only LATA 652 is in an MSA: the Boise City, ID Metropolitan MSA. This NPA is not in rationing. The April, 2015 NRUF Exhaust Forecast is 2Q2018 with a demand rate of 12 codes per year.

CO Code Summary:

As of May 11, 2015, the 208 NPA has 742 codes assigned, 40 codes available for assignment and 18 Un-Assignable codes: N11s, 208, 307, 555, 700, 923, 950, 958, 959, 976 and 986. There are 67 service provider OCNs that are code holders and all one-thousand-block holders are also code holders.

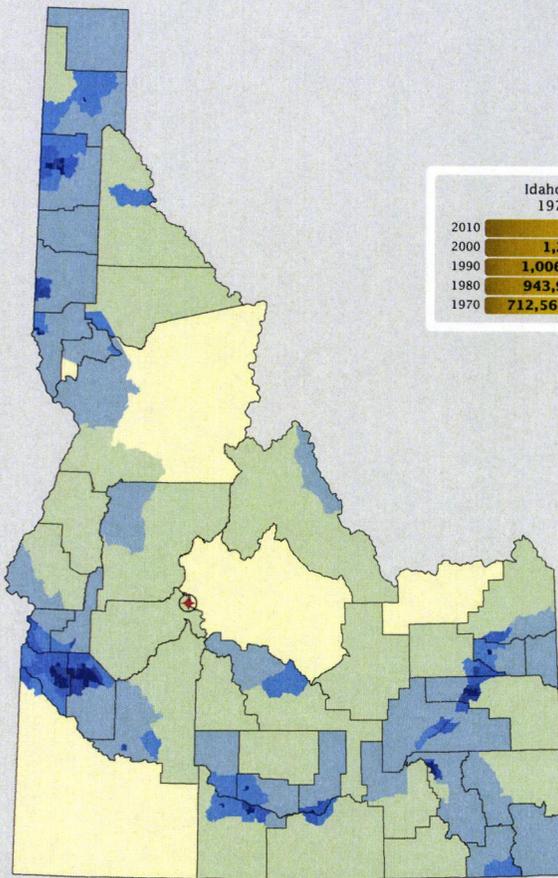
2010 Census Figures By County

Geography	Total Population 2010	Change from 2000	%Change from 2000
Idaho	1,567,582	273,629	21.10%
Ada	392,365	91,461	30.40%
Adams	3,976	500	14.40%
Bannock	82,839	7,274	9.60%
Bear Lake	5,986	-425	-6.60%
Benewah	9,285	114	1.20%
Bingham	45,607	3,872	9.30%
Blaine	21,376	2,385	12.60%
Boise	7,028	358	5.40%
Bonner	40,877	4,042	11.00%
Bonneville	104,234	21,712	26.30%
Boundary	10,972	1,101	11.20%
Butte	2,891	-8	-0.30%
Camas	1,117	126	12.70%
Canyon	188,923	57,482	43.70%
Caribou	6,963	-341	-4.70%
Cassia	22,952	1,536	7.20%
Clark	982	-40	-3.90%
Clearwater	8,761	-169	-1.90%
Custer	4,368	26	0.60%
Elmore	27,038	-2,092	-7.20%
Franklin	12,786	1,457	12.90%
Fremont	13,242	1,423	12.00%
Gem	16,719	1,538	10.10%
Gooding	15,464	1,309	9.20%
Idaho	16,267	756	4.90%
Jefferson	26,140	6,985	36.50%
Jerome	22,374	4,032	22.00%
Kootenai	138,494	29,809	27.40%
Latah	37,244	2,309	6.60%
Lemhi	7,936	130	1.70%
Lewis	3,821	74	2.00%
Lincoln	5,208	1,164	28.80%
Madison	37,536	10,069	36.70%
Minidoka	20,069	-105	-0.50%
Nez Perce	39,265	1,855	5.00%
Oneida	4,286	161	3.90%
Owyhee	11,526	882	8.30%
Payette	22,623	2,045	9.90%
Power	7,817	279	3.70%
Shoshone	12,765	-1,006	-7.30%
Teton	10,170	4,171	69.50%
Twin Falls	77,230	12,946	20.10%
Valley	9,862	2,211	28.90%
Washington	10,198	221	2.20%

(For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>)

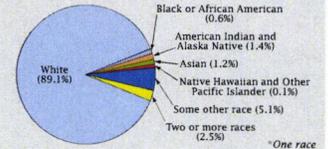
2010 Census: Idaho Profile

Population Density by Census Tract



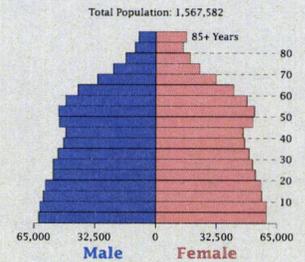
Idaho Population 1970 to 2010	
2010	1,567,582
2000	1,293,953
1990	1,006,749
1980	943,935
1970	712,567

State Race* Breakdown

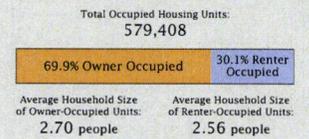


Hispanic or Latino (of any race) makes up **11.2%** of the state population.

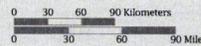
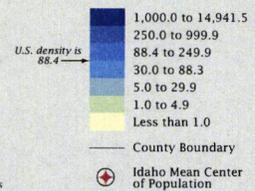
Population by Sex and Age



Housing Tenure



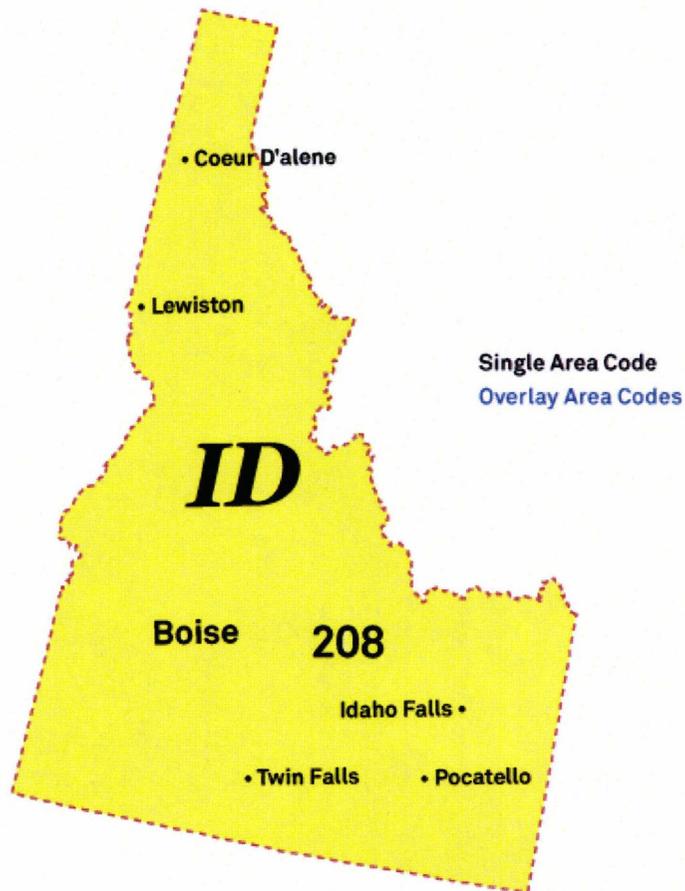
People per Square Mile by Census Tract



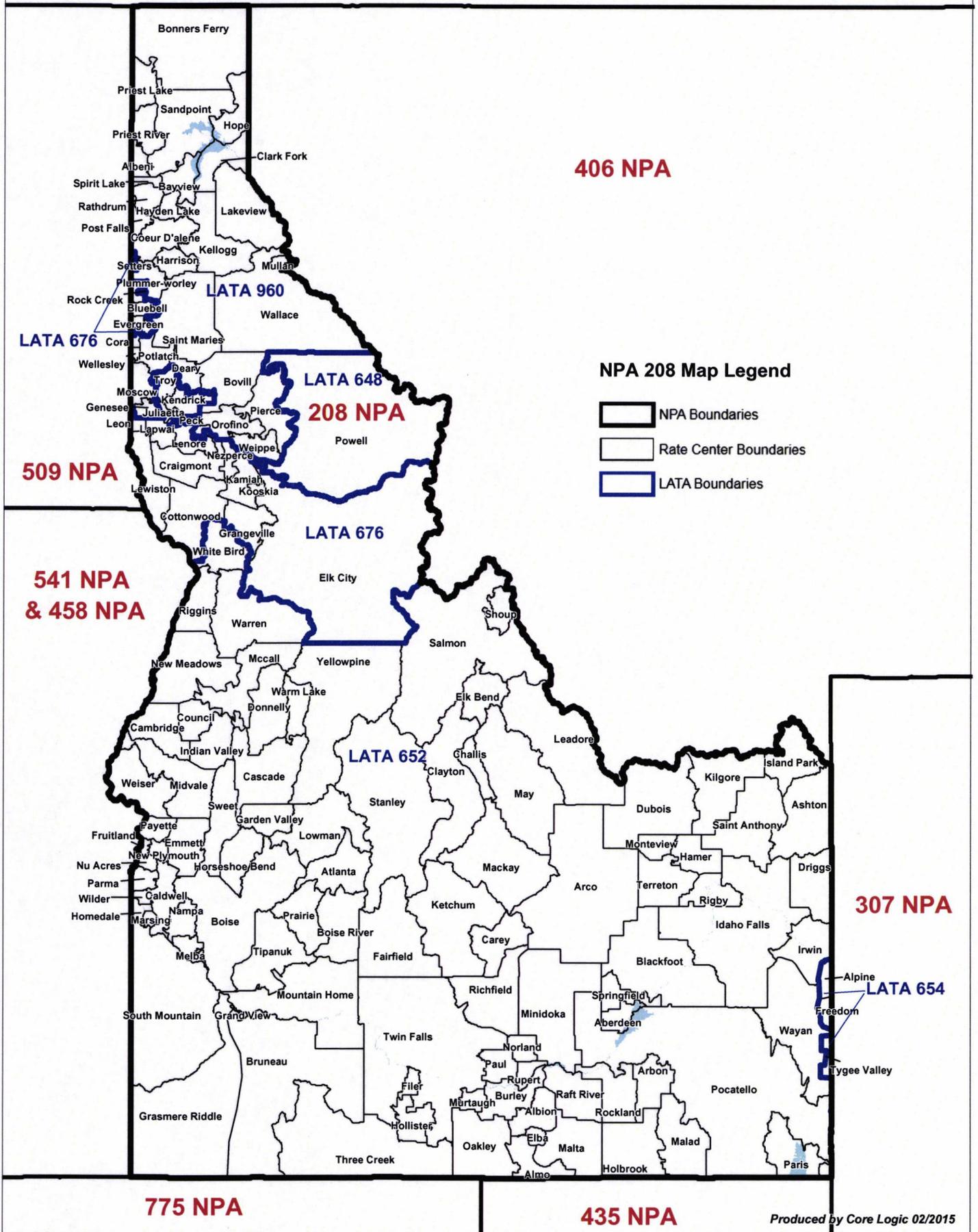
United States
Census
Bureau

NANPA
Area Codes Map

ID - Idaho



IDAHO NPA 208 Rate Center Map, LATA



RATE CENTER TABLE

STATE:ID								
NPA:208								
NAS Data 4-1-15								
Count of NXX	CATEGORY							
RC FULL NAME	CAP	CLEC	ILEC	PCS	RBOC	WIRELESS	(blank)	Grand Total
MAY				1				1
ABERDEEN				1			1	2
ALBENI				1				1
ALBION				1				1
ALMO				1				1
ALPINE				1				1
ARBON				1				1
ARCO				3				3
ASHTON				1				1
ATLANTA				1				1
BAYVIEW			2	1				3
BLACKFOOT			1		1	3	4	9
BLUEBELL				1				1
BOISE	1		65		18	67	34	185
BOISE RIVER				1				1
BONNERS FERRY			1	1				2
BOVILL				1				1
BRUNEAU			1	1				2
BURLEY			5		3	3	5	16
CALDWELL			5			4		9
CAMBRIDGE				1				1
CAREY				1			2	3
CASCADE			1	1				2
CHALLIS				1				1
CLARK FORK				1				1
CLAYTON				1				1
COEUR D'ALENE			17	8	6		13	44
CORA				1				1
COTTONWOOD			1			1		2
COUNCIL				1				1
CRAIGMONT			1			1		2
DEARY				1				1
DONNELLY				1				1
DRIGGS				3	1			4
DUBOIS				1				1
ELBA				1				1
ELK BEND				1				1
ELK CITY				1				1
EMMETT			1			3	2	6
EVERGREEN			1	1				2
FAIRFIELD				1			2	3
FILER				1				1
FREEDOM				1				1
FRUITLAND				1				1
GARDEN VALLEY				1				1
GENESEE				1				1
GRAND VIEW			1	1				2
GRANGEVILLE			1			1	2	4
GRASMERE RIDDLE				1				1
HAMER				1				1
HARRISON			2	1				3
HAYDEN LAKE			3	2				5
HOLBROOK				1				1
HOLLISTER				1				1
HOMEDALE				1			2	3
HOPE				1				1
HORSESHOE BEND				1			1	2
IDAHO FALLS			7		6	21	14	48
INDIAN VALLEY				1				1
IRWIN				1	1		1	3
ISLAND PARK				1				1
JULIAETTA			1	1				2
KAMIAH			1			1		2
KELLOGG				4			1	5
KENDRICK				2				2
KETCHUM			2		2	6	6	16

RATE CENTER TABLE

KILGORE			1					1
KOOSKIA						1		1
LAKEVIEW			1					1
LAPWAI		1				1		2
LEADORE			1					1
LENORE			1					1
LEON			1					1
LEWISTON		5		2		6	5	18
LOWMAN			1					1
MACKAY			1					1
MALAD			1				1	2
MALTA			1					1
MARSING			1				2	3
MCCALL			2		1		4	7
MELBA		1				1		2
MIDVALE			1					1
MINIDOKA			1					1
MONTEVIEW			1					1
MOSCOW		1	5		1		3	10
MOUNTAIN HOME		2				5	4	11
MULLAN			1					1
MURTAUGH						1		1
NAMPA		6		1		7	9	23
NEW MEADOWS			1					1
NEW PLYMOUTH		1				1		2
NEZPERCE		1				1		2
NORLAND			1					1
NU ACRES			1		2			3
OAKLEY			1					1
OROFINO			1				2	3
PARIS			1					1
PARMA			1				2	3
PAUL			1					1
PAYETTE					1	1	7	9
PECK			1					1
PIERCE			1					1
PLUMMER-WORLEY		1	1					2
POCATELLO		4			5	25	20	54
POST FALLS		4	3					7
POTLATCH			1					1
POWELL			1					1
PRAIRIE			1					1
PRIEST LAKE			1					1
PRIEST RIVER			2		1			3
RAFT RIVER			1					1
RATHDRUM		1	1					2
RICHFIELD			1					1
RIGBY						3		3
RIGGINS			1					1
ROCK CREEK			1					1
ROCKLAND			1					1
RUPERT			2		1		3	6
SAINT ANTHONY			2					2
SAINT MARIES			1				2	3
SALMON		1	2				3	6
SANDPOINT		1	3		1		5	10
SETTERS			1					1
SHOUP			1					1
SOUTH MOUNTAIN			1					1
SPIRIT LAKE			1					1
SPRINGFIELD			1				2	3
STANLEY			1					1
SWEET			1				2	3
TERRETON			1					1
THREE CREEK			1					1
TIPANUK			1					1
TROY		1	1					2
TWIN FALLS		5			5	20	16	46
TYGEE VALLEY		1				1	1	3
WALLACE			3					3
WARM LAKE			1					1

RATE CENTER TABLE

WARREN			1					1
WAYAN			1					1
WEIPPE			1					1
WEISER		2			1	1		4
WELLESLEY			1					1
WHITE BIRD			1					1
WILDER			1			2		3
YELLOWPINE			1					1
(blank)								
Grand Total	1	159	150	59	186	186		741

CODE HOLDER TABLE

STATE:ID								
NPA:208								
NAS Data 4/1/15								
Count of NXX	CATEGORY							
OCN_NAME	CAP	CLEC	ILEC	PCS	RBOC	WIRELESS	(blank)	Grand Total
365 WIRELESS, LLC						2		2
ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS				11				11
ALLIED WIRELESS COMMUNICATIONS LLC DBA ALLTEL-ID						5		5
AT&T LOCAL		7						7
BANDWIDTH.COM CLEC, LLC - ID		6						6
BLACKFOOT COMMUNICATIONS, INC. - MT		2						2
BLACKFOOT TELEPHONE COOPERATIVE, INC.			1					1
BROADVOX-CLEC, LLC - ID		1						1
CAMBRIDGE TELEPHONE COMPANY				4				4
CAMBRIDGE TELEPHONE COMPANY, INC. DBA CTC TELECOM					1			1
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - ID						87		87
CENTURYLINK COMMUNICATIONS LLC		3						3
CENTURYTEL GEM STATE INC-ID DBA CENTURYLINK - ID				4				4
CENTURYTEL OF IDAHO, INC. DBA CENTURYLINK				3				3
CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO				19				19
CLARK COMMUNICATIONS, INC.						1		1
COEUR D ALENE ANSWERING SERVICE, INC.						1		1
COLUMBINE TELCO DBA SILVER STAR COMMUNICATIONS				5				5
COX IDAHO TELCOM, LLC - ID		1						1
CTC TELECOM, INC.		2						2
CUSTER TELEPHONE BROADBAND SERVICES LLC - ID		1						1
CUSTER TELEPHONE COOPERATIVE, INC.				4		1		5
DIRECT COMMUNICATIONS ROCKLAND, INC.				3				3
ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - ID		13						13
ELTOPIA COMMUNICATIONS, LLC - ID		2						2
FARMERS MUTUAL TELEPHONE CO.				2				2
FARMERS MUTUAL TELEPHONE COMPANY, INC.					1			1
FILER MUTUAL TELEPHONE CO.		2						2
FREMONT TELCOM CO		4						4
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA				6				6
FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID				50				50
GOLD STAR COMMUNICATIONS, LLC					2			2
INLAND TELEPHONE CO.				2				2
JOSEPH B. MCNEAL DBA PAGEDATA						16		16
JOSEPH B. MCNEAL DBA WAVESENT, LLC						16		16
LEAP WIRELESS INTL, INC. DBA CRICKET COMM, INC.					9			9
LEVEL 3 COMMUNICATIONS - ID		23						23
MCIMETRO ACCESS TRANSMISSION SERVICES LLC		1						1
MCIMETRO ACCESS TRANSMISSION SERVICES LLC - ID		6						6
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC. - ID		4						4
MIDVALE TELEPHONE EXCHANGE, INC.				6				6
MILLENNIUM NETWORKS, LLC - ID		1						1
MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC.				5				5
NEUTRAL TANDEM-IDAHO, LLC - ID		3						3
NEW CINGULAR WIRELESS PCS, LLC						37		37
ONVOY, INC. - ID			13					13
OREGON - IDAHO UTILITIES, INC.				1				1
PAC - WEST TELECOMM, INC. - ID		1						1
POTLATCH TELEPHONE CO., INC.				4				4
PROJECT MUTUAL TEL. COOP. ASSN. INC. - ID		4						4
PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.				6				6
QWEST CORPORATION						186		186
RED-BAN COMMUNICATIONS, LLC - ID		2						2
RURAL NETWORK SERVICES, INC. - ID		1						1
RURAL TELEPHONE CO.				6				6
SILVER STAR TELEPHONE CO., INC.				2				2
SPRINT SPECTRUM L.P.					37			37
SYRINGA NETWORKS, LLC - ID	1							1
SYRINGA WIRELESS, LLC					8			8
TELEPORT COMMUNICATIONS AMERICA - ID - LLC		2						2
TIME WARNER CABLE INFORMATION SERVICES (IDAHO), ID		3						3
T-MOBILE USA, INC.						15		15
TW TELECOM OF IDAHO LLC - ID			35					35
UNION TELEPHONE COMPANY					1			1
WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP						5		5
XO IDAHO, INC.			20					20
YMAX COMMUNICATIONS CORP. - ID			2					2
(blank)								
Grand Total		1	159	150	59	186	186	741

208 NPA - RELIEF

IDAHO

Numbering Plan Area Born on Date: January 1, 1947

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE.....April 24, 2015
 PROJECTED EXHAUST DATE.....2Q2018
 ANNUALIZED CODE DEMAND PROJECTION.....12
 MONTHLY CO CODE DEMAND PROJECTION.....1.0
 NXX Assignment dataApril 1, 2015

CURRENT DIALING PLAN

Type of call	Call terminating to	Dialing plan
Local	Home NPA (HNPA) or Foreign NPA (FNPA)	7-digits (NXX-XXXX)
Toll	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)

NPA RELIEF ALTERNATIVES

OVERLAY ALTERNATIVE

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 208 NPA. Customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within and between NPAs in the affected area would be required. Central Office codes in the overlay NPA will be assigned upon request with the effective date of the new area code with a projected life of 66 years. At exhaust of the 208 NPA all future CO code assignments will be made in the overlay area code.

Total CO Codes = 741
 Total rate centers = 145
 Area Code Life = 66 Years

GEOGRAPHIC SPLIT ALTERNATIVE

In a geographic split a line is drawn along rate center boundaries of the current area code with rate centers on one side of the split line retaining the current area code and the rate centers of the other side of the split line changing to a new area code. Telephone numbers on both sides of the split line will retain seven-digit dialing. Calls dialed between the two resulting area codes will be on a 10-digit basis.

ALTERNATIVE #2 – GEOGRAPHIC SPLIT

The 208 area code is split by drawing a line along rate center boundaries as follows: The line starts at the Oregon border at the NPA boundary between the Riggins and New Meadows rate centers and follows the southern border of Riggins, Warren and Elk City rate Centers, then continues southerly on the eastern side of the Yellowpine and Lowman and Atlanta rate centers, then continues following along the southern border of the Stanley rate center then continues along the northern borders of Ketchum and Carey rate centers then continues between Carey and Arco rate centers then southerly between Richfield and Minidoka rate centers and then follows the eastern border of Twin Falls rate center then between Three Creek and Oakley rate centers and continues to the edge of the 208 NPA boundary at the Nevada border. The area inside this split line is to be labeled AREA B with a projected life of 65 years; the rest of the 208 NPA is to be labeled AREA A with a projected life of 68 years. This split line approximately follows many but not all of the county lines involved. Rate center boundaries do not follow jurisdictional boundaries. This split alternative is well balanced with only three years difference in projected lives. No recommendation is made for which side of the split line would receive the new NPA.

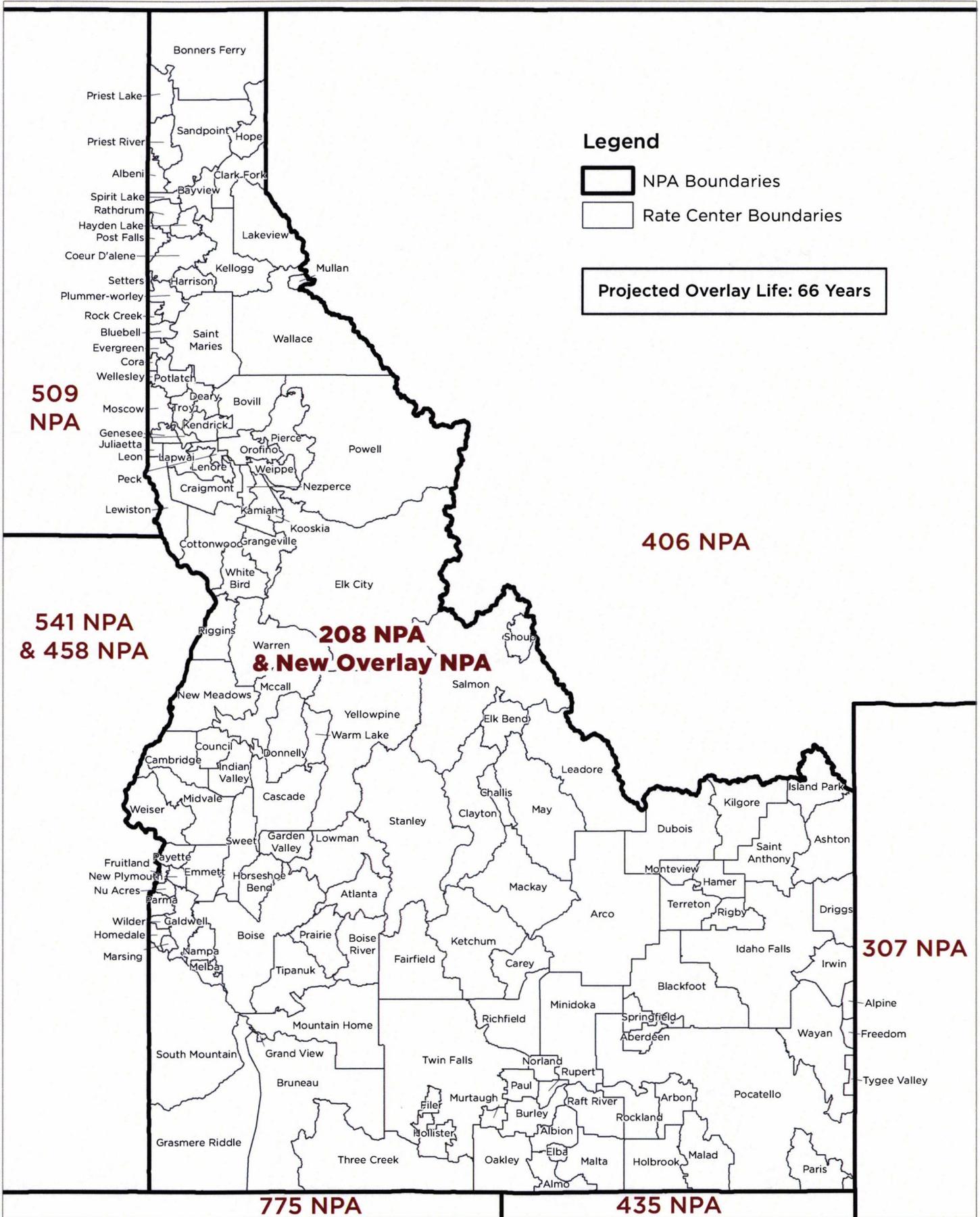
The forty-five rate centers inside Area B are as follows: Atlanta, Boise, Boise River, Bruneau, Caldwell, Cambridge, Carey, Cascade, Council, Donnelly, Emmett, Fairfield, Filer, Fruitland, Garden Valley, Grand View, Grasmere Riddle, Hollister, Homedale, Horseshoe Bend, Indian Valley, Ketchum, Lowman, Marsing, McCall, Melba, Midvale, Mountain Home, NAMPA, New Meadows, New Plymouth, Nu Acres, Parma, Payette, Prairie, Richfield, South Mountain, Sweet, Three Creek, Tipanuk, Twin Falls, Warm Lake, Weiser, Wilder and Yellowpine. The remaining one hundred rate centers are in Area A.

Area A
Total CO Codes = 368
Total rate centers = 100
Area Code Life = 68 Years

Area B
Total CO Codes = 373
Total rate centers = 45
Area Code Life = 65 Years

IDAHO NPA 208 Rate Center Map

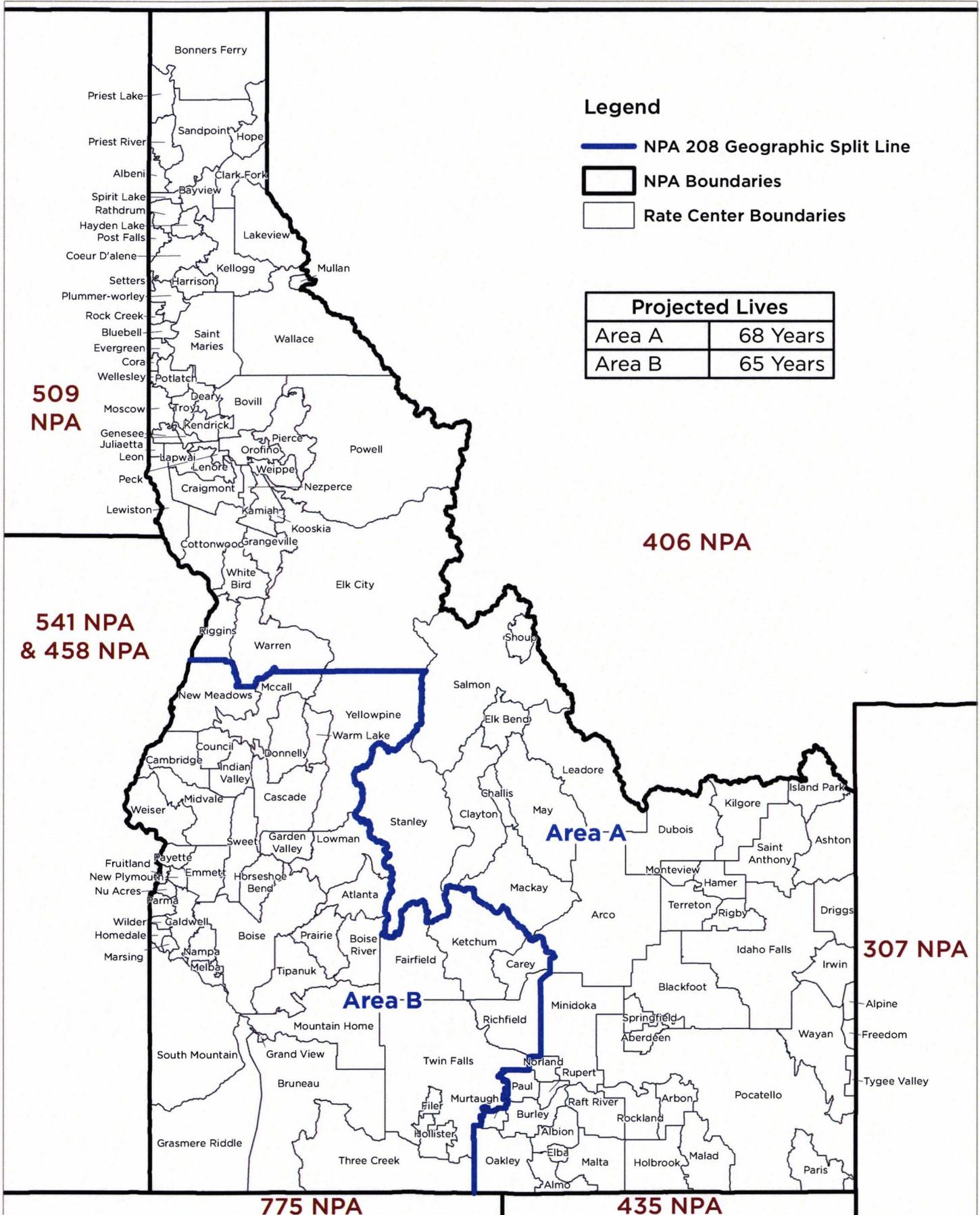
Alternative # 1 All Services Overlay



Legend

- NPA Boundaries
- Rate Center Boundaries

Projected Overlay Life: 66 Years



Legend

- NPA 208 Geographic Split Line
- NPA Boundaries
- Rate Center Boundaries

Projected Lives	
Area A	68 Years
Area B	65 Years

509
NPA

541 NPA
& 458 NPA

406 NPA

307 NPA

775 NPA

435 NPA

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing APPLICATION FOR MODIFIED PROCEDURES upon all parties included in the service list below by overnight courier at the mail address as indicated below to:

Don Howell
Lead Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

Brandon Karpen
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

Dated this 20th day of July, 2015



Kimberly Wheeler Miller