# **NPA 250**

### NUMBERING RELIEF

C.N.A.



## Initial Planning Document NPA 250 Numbering Relief

#### **September 10, 2004**

Version 1 - Initial Planning Document based on July 1, 2004 Relief Planning Numbering Resource Utilization Forecast

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#### Initial Planning Document NPA 250 Relief

#### 1. EXECUTIVE SUMMARY

NPA 250 consists of 275 exchanges, including the rapidly growing exchanges of Victoria, Nanaimo, Parksville, Campbell River, Comox, Duncan, Port Hardy and Saanich, located on Vancouver Island, and Kelowna, North and South Kamloops, Prince George, Vernon, Penticton, Fort St. John, Nelson, Prince Rupert and Quesnel, located in the Interior Mainland (northeast of the Lower Mainland, which is served by NPAs 604 and 778) of the province of British Columbia in Canada.

The results of the 2004 General Numbering Resource Utilization Forecast (G-NRUF) indicated that NPA 250 would exhaust by May 2009. Subsequently the Canadian Numbering Administrator (CNA) initiated a July 2004 Relief Planning Numbering Resource Utilization Forecast (R-NRUF), which indicated that the Central Office (CO) Codes in NPA 250 are now expected to exhaust by June 2009.

In this Initial Planning Document (IPD) the CNA has identified eleven different Relief Options to ensure that an adequate quantity of telephone numbers are available for assignment in the geographic area covered by NPA 250. The Relief Planning Committee (RPC) will use this IPD as the baseline document for the development of a Planning Document.

The objective of the NPA Relief Planning process is to ensure that CO Codes and telephone numbers are always available for use by Telecommunications Service Providers (TSPs) and their customers in the geographic area requiring relief.

The roles of the various participants (e.g., Canadian Radio-television and Telecommunications Commission (CRTC), CNA, CRTC Interconnection Steering Committee (CISC), RPC participants, Interested Parties) for NPA Relief Planning, are identified in section 6.0 of the CRTC approved Canadian NPA Relief Planning Guidelines, dated 13 August 2003 (the Guidelines). A copy of the Guidelines can be obtained from: http://www.cnac.ca/npa\_data.htm.

To increase public awareness and participation in the NPA Relief Planning process, the CRTC has determined that NPA Relief Planning Committees will be established as ad hoc committees of the CISC. Generally, a separate ad hoc committee is created to deal with relief in each area code. The CNA, in its function as NPA Relief Planning Coordinator, acts as chair of these ad hoc committees. Meetings and conference calls of the ad hoc NPA Relief Planning Committees are all open to public participation.

NPA Relief Planning shall be conducted under the regulatory oversight of the CRTC. Notwithstanding the process detailed in the Guidelines, the CRTC may exercise its authority under the <u>Telecommunications</u> <u>Act</u> to alter this process at any time. The CRTC has the authority, under the <u>Telecommunications Act</u>, to review, modify and give final approval to the Planning Document and the Relief Implementation Plan (RIP) developed and submitted to the CRTC by the RPC via the CISC process.

This IPD is being issued in accordance with the Guidelines to facilitate the selection of a consensus NPA 250 Relief Option and a Relief Date.

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#### 2. INTRODUCTION

In 1996, NPA 250 was created by splitting the geographic area covered by NPA 604 into two geographic areas. Vancouver Island and the Interior Mainland of British Columbia were assigned NPA 250, while the Lower Mainland (the southwest part of British Columbia) retained NPA 604. NPA 250 consists of 275 exchanges, including the rapidly growing exchanges of Victoria, Nanaimo, Parksville, Campbell River, Comox, Duncan, Port Hardy, Saanich, Kelowna, North and South Kamloops, Prince George, Vernon, Penticton, Fort St. John, Nelson, Prince Rupert and Quesnel.

On November 3, 2001, a Concentrated Overlay using the new NPA 778 was introduced over a portion of NPA 604 to provide numbering relief to the NPA 604 geographic serving area.

In accordance with the Guidelines, the Canadian Numbering Administrator (CNA) is required to conduct an annual General Numbering Resource Utilization Forecast (G-NRUF) in February of each year. The input from the G-NRUF is used to estimate the Projected Exhaust Date for each Canadian NPA.

The chart and data contained in Annex A, Figure 3 provides a summary of the actual CO Code assignments and historical G-NRUF forecasts for NPA 250. This information was used by the CNA to determine the Projected Exhaust Date for NPA 250. When an NPA is projected to exhaust within a 72-month time period, the CNA initiates relief planning for that NPA with the objective of implementing relief 12 to 18 months in advance of the then Projected Exhaust Date. Over time, the Projected Exhaust Date may change as the forecast requirement for CO Codes and telephone numbers changes in response to customer demand for existing and new telecommunications services and the requirements of existing and new Telecommunications Service Providers (TSPs). The objective is to ensure that users and TSPs always have access to telephone numbers and CO Codes so that their needs and requirements can be satisfied.

NPA 250 relief must be in place well in advance of reaching 758 assigned CO Codes, to allow for forecast volatility.

The rapidly growing number of CO Codes due to wireless expansion and contemplated future new services in a few specific exchanges is exhausting the number of CO Codes available for assignment in NPA 250. The July 2004 Relief Planning Numbering Resource Utilization Forecast (R-NRUF) results indicate that the majority of the projected growth in NPA 250 is limited to about 26 exchanges. In the remaining NPA 250 exchanges there is virtually no projected growth. See Annex A, Figures 2, 19, 20 and 21 for diagrams of the affected area showing exchanges, major cities, highways and rivers.

It is very important to closely monitor the expansion plans of all existing and emerging TSPs to ensure that relief is provided in advance of exhaust so that CO Codes and telephone numbers are always available for TSPs and their customers, and to avoid creation of a Jeopardy Condition with the associated need to implement Special Conservation Procedures in the area served by NPA 250. A Jeopardy Condition exists when the forecast and/or actual demand for CO Codes exceeds the quantity of CO Codes available for assignment within the NPA before it is expected that relief can be implemented.

Timely introduction of a new NPA into the affected geographic area will ensure that Central Office (CO) Codes and telephone numbers are always available for use by TSPs and their customers in the geographic area requiring relief.

The NPA 250 Relief Planning Committee (RPC) will use this Initial Planning Document (IPD) as the baseline document for the development of a Planning Document that will contain recommendations for a Relief Option and a Relief Date for NPA 250. The Planning Document will be forwarded to the Canadian Radio-television and Telecommunications Commission (CRTC) via the CRTC Interconnection Steering Committee (CISC) process.

#### 3. NPA RELIEF PLANNING PROCESS

The roles of the various participants (e.g., CRTC, CNA, CISC, RPC participants, Interested Parties) for NPA Relief Planning, are identified in section 6.0 of the CRTC approved Canadian NPA Relief Planning Guidelines, dated 13 August 2003. A copy of the Guidelines can be obtained from: http://www.cnac.ca/npa\_data.htm.

To increase public awareness and participation in the NPA Relief Planning process, the CRTC has determined that NPA Relief Planning Committees will be established as ad hoc committees of the CISC. Generally, a separate ad hoc committee is created to deal with relief in each area code. The CNA, in its function as NPA Relief Planning Coordinator, acts as chair of these ad hoc committees. Meetings and conference calls of the ad hoc NPA Relief Planning Committees are all open to public participation and are conducted in accordance with the CISC Administrative Guidelines. A copy of the CISC Administrative Guidelines can be obtained from:

http://www.crtc.gc.ca/cisc/COMMITTE/C-docs//CISC%202001-03-31.doc.

NPA Relief Planning shall be conducted under the regulatory oversight of the CRTC. Notwithstanding the process detailed in the Guidelines, the CRTC may exercise its authority under the <u>Telecommunications</u> <u>Act</u> to alter this process at any time. The CRTC has the authority, under the <u>Telecommunications Act</u>, to review, modify and give final approval to the Planning Document and the Relief Implementation Plan (RIP) developed and submitted by the RPC to the CRTC via the CISC process.

Any person wishing to participate in the NPA Relief Planning process can contact the CNA and request to be added to NPA-specific distribution lists. In addition, individuals can also register with the CRTC as interested parties to any proceedings that result from the NPA Relief Planning process. More information on how to participate in CRTC public processes is available at: http://www.crtc.gc.ca/eng/publicpar\_3.htm.

#### 4. NPA RELIEF METHODS

Once the necessity for NPA code relief was established, all code relief methods were considered. The following paragraphs provide definitions and general attributes of the Geographic Split, Overlay Method, Boundary Realignment and a brief description of the Technology-specific Overlay.

#### 4.1. Geographic Split

#### 4.1.1. Definition

By this method, the exhausting NPA is split into two or more geographic areas, with one area retaining the existing NPA code, and the other(s) being assigned a new NPA code(s). To minimise the quantity of number changes, the area with the largest number of customers usually retains the existing NPA. Boundaries between old and new NPA(s) are usually determined by natural, physical or jurisdictional boundaries based on geographical features.

NPA splits have occurred with enough frequency so that technical aspects have been addressed and established implementation procedures are generally understood. Public education and acceptance of the process has been made easier because of the numerous NPA splits that have occurred throughout North America. This method generally provides long-term relief for an area.

#### 4.1.2. General Attributes

- A known method of NPA relief, last implemented in Canada in 1999.
- Ten-digit dialling required for local calls between different NPAs.
- Number changes required within new NPA boundaries.
- Reprogramming or replacement of equipment (switches, PBXs, cellular phones, etc.).
- Some existing customers inconvenienced.
- More economic burden (businesses, public costs, stationery, etc.).
- Not as expensive to display in telephone directory.
- Requires a permissive dialling period.
- Possible boundary disputes.

#### 4.2. Overlay

#### 4.2.1. Definition

An NPA overlay occurs when more than one NPA code serves the same geographic area. Opening up a new NPA code provides code relief when the existing NPA is exhausted. Numbers from the new NPA are assigned for new growth on a carrier neutral basis, i.e., first come first served. This method necessitates 10-digit dialling of local calls between the old and new NPAs coincident with NXX codes being implemented in the new NPA (universal 10-digit dialling for all local calls eliminates customer confusion). It has also been established that any 7-digit local calling from adjacent areas into the overlay area must be converted to 10-digit dialling at the time of relief.

The Distributed Overlay strategy may be considered in situations when growth in telephone numbers is expected to be more or less evenly distributed throughout the existing NPA requiring relief. The new NPA is "overlaid" on top of the NPA requiring relief and covers exactly the same geographic boundaries.

A Concentrated Overlay strategy may be considered in situations where the majority of the demand for new telephone numbers is expected to be concentrated in one section of an existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could be covered by the same NPA. The new NPA would be assigned initially to the section of the original NPA experiencing the greatest growth (e.g., the metropolitan area), and any need for new CO Codes in that section would be met by the assignment of CO Codes from the new NPA. In the area not covered by the new NPA, any future need for new CO Codes would be met by the assignment of CO Codes from the original NPA. In order to ensure that sufficient CO Codes are available for assignment from the original NPA to that section not covered by the new concentrated overlay, it is important for the new concentrated overlay to be implemented sooner than with other solutions.

In some cases CO Code assignment monitoring and CO Code conservation measures may have to be implemented prior to the introduction of the new Concentrated Overlay in order to ensure that sufficient CO Codes in the original NPA are available. When relief is required in other sections of the original NPA, the geographic coverage area of the new NPA could be expanded. In some cases, more than one Concentrated Overlay could be implemented to cover different sections of a single existing NPA.

#### 4.2.2. General Attributes

- A known method of NPA relief most recently implemented in 3 NPAs in Canada in 2001, and with 2 additional NPAs scheduled for implementation.
- Requires universal 10-digit dialling within and between NPAs.
- No number changes are required for existing customers.
- · Least disruptive to end-users.
- · Less economic burden for existing business.
- Same location, two or more NPAs in residence/business.
- · Increased directory costs.

#### 4.3. Boundary Realignment

#### 4.3.1. Definition

A Boundary Realignment is when the geographic boundaries of an existing NPA requiring relief are expanded to merge with either all or part of other neighbouring NPA(s). This method may be used to defer adding a new NPA where excess capacity is available in the neighbouring NPA(s).

#### 4.3.2. General Attributes

- Requires universal 10-digit dialling within and between NPAs.
- No number changes are required for existing customers.
- Less disruptive to end-users.
- · Less economic burden for existing business.
- Same location, two or more NPAs in residence/business.
- Increased directory costs.
- Advances exhaust of neighbouring NPA(s).

#### 4.4. Technology-specific Overlay

A Technology-specific Overlay is an overlay of a new NPA that is assigned specifically to one or more types of service or technology. An example of a Technology-specific Overlay is a new NPA dedicated only to wireless services. For the following reasons, this type of overlay has generally not been accepted as a preferred method:

- Would be inconsistent with regulatory practice of seeking technology-neutral solutions.
- Favours certain types of service provider, i.e. not competitively neutral.
- Inconsistent with future implementation of Local Number Portability between types of service provider or technology.
- Inconsistent with service providers' changes of type of service provider, e.g. migration from Wireless Service Provider to Local Exchange Carrier.
- Numbers in the existing NPA currently used for the service or technology to be moved to the new Technology-specific NPA would need to be changed; otherwise the new NPA would only provide relief for growth in the service or technology to which the new NPA is assigned. When existing CO Codes in the old NPA are shared between services needing a number change and services that do not need a number change, then these number changes would require that initial CO Codes be assigned in the new NPA, without freeing up any CO Codes in the old NPA, resulting in less efficient use of numbering resources and a requirement for earlier subsequent NPA Relief.
- Has not been implemented in Canada, and may cause confusion and additional costs for customers and service providers.

#### 5. NPA EXHAUST INFORMATION

NPA 250 contains 275 exchanges. A list of the exchanges is provided in Annex B.

The results of the 2004 G-NRUF indicated that CO Codes in NPA 250 were expected to exhaust by May 2009. Results of the July 2004 R-NRUF indicate that CO Codes in NPA 250 are now expected to exhaust by June of 2009.

Refer to Annex A, Figures 4, 5, 6 and 7 for graphs that represent the rate of CO Code utilization in NPA 250 based on results from the 2004 G-NRUF and the July 2004 R-NRUF.

Currently 7-digit local dialling is permitted within NPA 250. There is no local dialling between NPA 250 and adjacent NPAs 604/778, 403, 780, 907, 360/564, 509, 208 and 406; hence no CO codes are protected to permit 7-digit local dialling between NPA 250 and these NPAs. Local dialling between NPA 250 and adjacent NPA 867 exists only for Lower Post BC and Watson Lake YT. In theory, one CO Code should be protected in the NPA 250 area from being assigned in Lower Post. In practice, since there is no need for any future CO Codes in Watson Lake, Code Protection in the NPA 250 area can be treated as non-existent. Since there is in effect no CO Code Protection in the NPA 250 area, no dialling changes are needed in any adjacent NPAs.

#### 6. RELIEF OPTIONS IDENTIFIED BY THE CNA IN THE IPD

Four methods, comprising eleven Relief Options are included in the IPD.

The following alternatives were examined in detail:

- 1. Geographic Split two options (Plans 1a and 1b)
- 2. Boundary Realignment two options (Plans 2a and 2b)
- 3. Concentrated Overlay three options (Plans 3a, 3b and 3c)
- 4. Distributed Overlay- one option (Plan 4)
- 5. Distributed Overlay with Boundary Realignment- three options (Plans 5a, 5b and 5c)

These Relief Options were evaluated using the assumptions shown below:

- A. The Relief Date for a Geographic Split or any one of the four different Distributed Overlay options will be 1<sup>st</sup> Q 2008 (18 months prior to the NPA 250 Projected Exhaust Date of June 2009 identified using the July 1, 2004 R-NRUF results).
- B. The Relief Date for the three options that use a Concentrated Overlay will be 1<sup>st</sup> Q 2007 (30 months prior to the NPA 250 Projected Exhaust Date of June 2009 identified using the July 1, 2004 R-NRUF results). This length of time is required to ensure that a sufficient number of CO Codes remain available to provide for the future growth of NPA 250.
- NPA Relief Planning will not create additional Protected CO Codes due to cross-NPA border local
   7-digit dialling patterns.

See Annex A, Figures 8 through 18 for diagrams of the Relief Options identified by the CNA.

#### 6.1. Geographic Split

Existing physical features easily lend themselves for use as boundaries to split NPA 250. The NPA 250 exchanges located on Vancouver Island are separated by the Strait of Georgia from the exchanges located on the Mainland of British Columbia.

If a boundary in the Strait of Georgia is used to split the existing NPA 250 area into separate Vancouver Island and Mainland areas, then the Southern and Northern Gulf Islands would be grouped with Vancouver Island, and the Queen Charlotte Islands would be grouped with the Mainland, in order to align these islands with existing transportation and communication links. In this scenario, the NPA 250 population and the percentage split of assigned CO Codes would be as follows:

NPA and Area	Estimated Population (Note 1)			ote 1) Assigned 250-N2 (Note 4)		
	No. of	% of Total	% of Total	% of Total	% of Total	
	People	BC	NPA 250	BC	NPA 250	
250 Mainland (Note 2)	1,002,000	24.2%	59.5%	32.7%	66.3%	
250 Vancouver Island (Note 3)	682,000	16.4%	40.5%	16.7%	33.7%	

Notes:

- Populations based on 2003 estimates from www.bcstats.gov.bc.ca/data/pop/popstart.htm and lists of exchanges by NPA.
- "250 Mainland" also includes the Queen Charlotte Islands, and central coast islands and communities except for Ocean Falls.
- "250 Vancouver Island" also includes all southern Gulf Islands, northern Gulf Islands (except Texada), and Ocean Falls.
- The "Assigned 250-NXXs" indicate the quantity of NXXs in service or assigned in exchanges in each area expressed as a % of the total NXXs in service or assigned in NPA 250 or in all BC exchanges as of July 9, 2004.

5. The following population data for BC NPAs 604/778 is provided for comparison:

NPA and Area	Estimated Population 2003			Assigned NXXs		
	No. of people	% of Total BC	% of NPAs	% of Total	% of Total	
			604+778	BC	NPAs	
					604+778	
604/778 overlay	2,287,000	55.2%	92.9%	45.5%	89.8%	
604 outside overlay	176,000	4.2%	7.1%	5.2%	10.2%	

Population related to quantity of "Available for Assignment" and "New Entrants Reserved (NER)" NNXs as of July 9, 2004:

NPA and Area	Estimated Population 2004		Qty Avail. &	Avail & NER NXXs
	No. of people	% of Total BC	NER NXXs	per 10000 Popn.
250	1,699,400	40.6%	167	1.0
604/778 overlay	2,308,000	55.2%	673	2.9
604 outside overlay	177,600	4.2%	210	11.9
Total BC	4,147,000	100.0%	1050	2.5

A geographic split of NPA 250 would increase the quantity of separate Relief Planning areas in BC from three to four, and three new NPAs would be required in BC over the next 20 year period.

Using the Strait of Georgia as the split boundary, two Geographic Split sub-options were assessed.

With these sub-options, number changes would be required either on Vancouver Island or in the NPA 250 Mainland area (as defined above). Telephone numbers in both these areas were changed when NPA 250 was split from NPA 604. 7-digit local dialling was retained in both the NPAs with permissive dialling ending on April 6, 1997.

The main advantage of using the Strait of Georgia as the split boundary in NPA 250 is that the dialling pattern does not change in NPA 250 or the new NPA, therefore the users in both NPAs could continue with 7-digit local dialling.

#### 6.1.1. Geographic Split of NPA 250 (Plan 1a):

The Mainland portion of NPA 250, with 220 exchanges, would retain NPA 250, and the Vancouver Island portion of NPA 250, with 55 exchanges, would be assigned the new NPA. The area that would retain NPA 250 contains the rapidly growing exchanges of Kelowna, Kamloops, Prince George, Vernon, Penticton, Fort St. John, Cranbrook and Nelson, while the new NPA would contain the rapidly growing exchanges of Victoria, Nanaimo, Duncan, Campbell River and Courtenay. Using this sub-option, approximately 682,000 people on Vancouver Island would be affected by a telephone number change.

After the split, NPA 250 and the new NPA would be expected to exhaust in 2024 and 2044 respectively.

This Relief Option would increase the number of separate Relief Planning areas in BC from three to four, and three new NPAs would be required in BC during the next 20 year period.

#### 6.1.2. Geographic Split of NPA 250 (Plan 1b):

The Vancouver Island portion of NPA 250, with 55 exchanges, would retain NPA 250, and the Mainland portion of NPA 250, with 220 exchanges, would be assigned the new NPA. If the quantity of number changes required is roughly proportional to the area population, there would be around 1,002,000 people in the NPA 250 Mainland area that would be affected by a telephone number change. The larger quantity of number changes required by this sub-option is a drawback compared to the quantity of number changes required by Plan 1a.

After this split, NPA 250 and the new NPA would be expected to exhaust in 2044 and 2023 respectively.

This Relief Option would increase the number of separate Relief Planning areas in BC from three to four, and three new NPAs would be required in BC during the next 20 year period.

#### 6.2. Boundary Realignment

#### 6.2.1. Boundary Realignment with NPA 778 (Plan 2a):

This Relief Option would realign the boundaries of the 275 exchanges comprising NPA 250 with the NPA 778/604 concentrated overlay area located in the Lower Mainland of BC, which includes 21 exchanges in Greater Vancouver, Abbotsford, and Mission. NPA 250 resources will not be assigned to the 21 exchanges in Greater Vancouver, Abbotsford, and Mission. NPA 250 and NPA 778 would be expected to exhaust in the years 2009 and 2014 respectively.

This Relief Option would reduce the number of separate Relief Planning areas in BC from three to two, and two new NPAs would be required in BC during the next 20 year period.

Note: With the relief of NPA 250 initially provided by boundary realignment of NPA 778, it would be possible to defer the introduction of the first new NPA in BC until 2Q 2013.

#### 6.2.2. Boundary Realignment with NPAs 778 and 604 (Plan 2b):

This Relief Option would realign the boundaries of NPAs 250, 604 and 778 to cover all 318 exchanges in the province of British Columbia (275 exchanges in NPA 250 and 43 exchanges in NPAs 604 and 778). NPA 250 resources will not be assigned to the 43 exchanges in NPAs 604 and 778. NPAs 250, 778 and 604 would be expected to exhaust in the years 2009, 2016 and 2016 respectively.

This option would reduce the number of separate Relief Planning areas in BC from three to one, and two new NPAs would be required in BC during the next 20 year period.

Implementation of this Relief Option would require filing a Review and Vary application with the Commission to overturn the provisions of Order CRTC 2000-786.

Note: With the relief of NPA 250 initially provided by boundary realignment of NPAs 778 and 604, it would be possible to defer the introduction of the first new NPA in BC until 4Q 2014.

#### 6.3. Concentrated Overlay

Three different Relief Options were evaluated to introduce the new NPA in the NPA 250 area using the Concentrated Overlay method of providing CO Code relief.

The main advantage of introducing any Overlay method as opposed to the Geographic Split method is that telephone number changes are not necessary in the area where relief is required. However, introduction of

an overlay NPA eliminates 7-digit local dialling and introduces 10-digit local dialling throughout the overlay NPA area

#### 6.3.1. Concentrated Overlay on NPA 250 Vancouver Island area, and NPA 250 Mainland area grows with NPA 250 (Plan 3a):

This Relief Option would overlay a new NPA over the 55 exchanges comprising the Vancouver Island portion of the NPA 250 area. The remaining 220 exchanges located in the Mainland area of NPA 250 would continue to grow using the remaining CO Codes available for assignment in NPA 250.

With this overlay, NPA 250 and the new NPA would be expected to exhaust in 2Q 2011 and 2059 respectively.

This option increases the number of separate Relief Planning areas in BC from three to four, and four new NPAs would be required in BC over the next 20 year period.

#### 6.3.2. Concentrated Overlay on NPA 250 Mainland area, and NPA 250 Vancouver Island area grows with NPA 250 (Plan 3b):

This Relief Option would overlay a new NPA over the 220 exchanges comprising the Mainland portion of the NPA 250 area. The remaining 55 exchanges in the Vancouver Island area of NPA 250 would continue to grow using the remaining CO Codes available for assignment in NPA 250.

With this overlay option, NPA 250 and the new NPA would be expected to exhaust in 4Q 2012 and 2047 respectively.

This option would increase the number of separate Relief Planning areas in BC from three to four, and four new NPAs would be required in BC over the next 20 year period.

#### 6.3.3. Concentrated Overlay on the NPA 250 Mainland & NPA 778 areas, and NPA 250 Vancouver Island area grows with NPA 250 (Plan 3c):

This Relief Option would overlay a new NPA over the 220 exchanges comprising the Mainland portion of the NPA 250 area in addition to the NPA 778/604 concentrated overlay area located in the Lower Mainland of BC, which includes 21 exchanges in Greater Vancouver, Abbotsford, and Mission. The remaining 55 exchanges in the Vancouver Island portion of NPA 250 would continue to grow using the remaining CO Codes available for assignment in NPA 250.

NPA 250, NPA 778 and the new NPA would be expected to exhaust in the years 4Q 2012, 2018 and 2026 respectively.

This option would maintain the number of separate Relief Planning areas in BC at three, and four new NPAs would be required in BC during the next 20 year period.

#### 6.4. Distributed Overlay

Four different Relief Options were evaluated to introduce the new NPA using the Distributed Overlay method of providing NPA relief.

#### 6.4.1. Distributed Overlay on NPA 250 (Plan 4):

This Relief Option would overlay a new NPA over all 275 exchanges in NPA 250. NPA 250 and the new NPA would be expected to exhaust in 2009, and 2032 respectively.

This option would maintain the number of separate Relief Planning areas in BC at three, and three new NPAs would be required in BC over the next 20 year period.

#### 6.4.2. NPA 250 Distributed Overlay, with 778 area Boundary Realignment at NPA 778 Exhaust (Plan 5a):

This Relief Option would initially overlay a new NPA over all 275 exchanges in NPA 250. When NPA 778 approaches exhaust, the boundaries of the new NPA and NPA 250 would be realigned to include the existing NPA 778/604 concentrated overlay area, and the boundary of the NPA 778 area would be extended to include the new NPA and NPA 250.

NPAs 250, 778 and the new NPA would be expected to exhaust in 2009, 2018 and 2024 respectively. This plan would mean that relief for NPA 778 would not be required until 2024, when the new NPA exhausts.

This option would reduce the number of separate Relief Planning areas in BC from three to two, and three new NPAs would be required in BC over the next 20 year period.

#### 6.4.3. NPA 250 Distributed Overlay, with 778 area Boundary Realignment coincident with NPA 250 Relief (Plan 5b):

This Relief Option proposes to overlay a new NPA on all 275 exchanges in NPA 250, and the area covered by the existing NPA 778/604 concentrated overlay area. Coincident with the implementation of the new NPA, the boundary of NPA 778 would be realigned to include the new NPA and NPA 250.

The boundary of NPA 250 could be realigned to include the existing NPA 778/604 concentrated overlay area either at the time of relief, or towards the end of the life of NPA 778. Deferral of boundary realignment towards the exhaust of NPA 778 would prevent any of the remaining NPA 250 and NPA 778 CO Codes from being assigned outside the original NPA 250 and 778 areas..

NPAs 250, 778 and the new NPA would be expected to exhaust in 2009, 2024 and 2024 respectively. This plan would defer the exhaust of NPA 778 from 2018 to 2024.

This Relief Option would reduce the number of separate Relief Planning areas in BC from three to two, and three new NPAs would be required in BC during the next 20 year period.

#### 6.4.4. NPA 250 Distributed Overlay, with 604 & 778 area Boundary Realignments coincident with NPA 250 Relief (Plan 5c):

This Relief Option would overlay a new NPA over all 318 exchanges in the province of British Columbia (275 exchanges in NPA 250 and 43 exchanges in NPAs 604 and 778). The boundaries of NPAs 250, 604 and 778 would be realigned to cover all 318 exchanges at the time of NPA 250 relief.

NPAs 250, 778, 604 and the new NPA would be expected to exhaust in the years 2009, 2024, 2024 and 2024 respectively.

This option reduces the number of separate Relief Planning areas in BC from three to one, and two new NPAs would be required in BC during the next 20 years.

Note: Coincident with NPA 250 relief, assignments of NPA 604 CO codes could be restricted, or boundary realignment of the portion of NPA 604 outside the NPA 778 area could be deferred until CO Codes in NPA 778 have exhausted. Such a restriction would prevent remaining NPA 604 CO Codes from being assignable in the 778 area before 2018. This would enable conformance until that time with Order CRTC 2000-786 (604 Relief Order), which mandated that NPA 604 CO codes remaining as of November 3, 2001 be dedicated to locations outside of NPA 778.

#### 6.5. Summary of Relief Options

The following table summarizes alternative options

			Exhaus	st Dates		Relief - Timing &	Туре	Population	Local
Plan	Description	NPA	New	NPA	NPA	Dates (area)	Туре	Affected by Number	Dial
		250	NPA	778	604	[for the next relief only]	31	changes	# D
						•			
1a	Geographic Split of NPA 250 -	2009	2044			<b>2007</b> (250)	S	.682m	7
	Vancouver Island gets new	2024		2018		<b>2016</b> (778)	0	Nil	10
	NPA, and Mainland grows with					<b>2022</b> (New Mld)	S/O*	?m/Nil*	7/10*
	NPA 250					<b>2032</b> (778)	0	Nil	10
					2025	<b>2042</b> (Island)	S/O*	?m/Nil*	7/10*
						<b>2023</b> (604)	0	Nil	10
1b	Geographic Split of NPA 250 -	2009				<b>2007</b> (250)	S	1.002m	7
	Mainland gets new NPA, and			2018		<b>2016</b> (778)	0	Nil	10
	Vancouver Island grows with		2023			<b>2021</b> (250 Mld area)	S/O*	?m/Nil*	7/10*
	NPA 250	2044				<b>2023</b> (604)	0	Nil	10
					2025	<b>2042</b> (250 Island)	S/O*	?m/Nil*	7/10*
2a	Boundary realignment with NPA 778 boundaries	2009		2014	2025	<b>2007</b> (250)	Bdy rlgn	Nil	7>10
						<b>2012</b> (250+778)	Ō	Nil	10
						<b>2023</b> (604)	0	Nil	10
2b	Boundary realignment with	2009		2016	2016	<b>2007</b> (250)	Bdy	Nil	7>10
	NPAs 604 and 778 areas at						rlgn		
	NPA 250 relief					<b>2014</b> (250+778+604)	0	Nil	10
		0044							
3a	Concentrated Overlay on	2011 (2Q)	2059	2018		<b>2007</b> (250 Island)	0	Nil	7>10
	NPA 250 Vancouver Island	(24)			2025	<b>2010</b> (250 Mainland)	S/O*	?m/Nil*	7>10*
	area, and NPA 250 Mainland					<b>2016</b> (778)	0	Nil Nil	10
- 01	area grows with NPA 250	2012	00.47	0040	2225	<b>2023</b> (604)	0		10
3b	Concentrated Overlay on	(3Q)	2047	2018	2025	<b>2007</b> (250 Mainland)	0	Nil	7>10
	NPA 250 Mainland area, and	()				<b>2010</b> (250 Island)	0	Nil Nil	7>10 10
	Vancouver Island area grows with NPA 250					<b>2016</b> (778) <b>2032</b> (778)	0	Nil	10
3c	Concentrated Overlay on the	2009	2026	2018	2025	<b>2007</b> (250 Mainland)	0	Nil	7>10
30	NPA 250 Mainland & NPA 778	2009	2020	2010	2023	<b>2010</b> (250 Island)	S/O*	?m/Nil*	7>10 7>10*
	areas, and Vancouver Island	(3Q)				<b>2010</b> (250 Islahu) <b>2024</b> (250 Mld/778)	0	Nil	10
	area grows with NPA 250	()				<b>2024</b> (250 Mild/776) <b>2023</b> (604)	0	Nil	10
4	Distributed Overlay on NPA 250	2009			2025	<b>2007</b> (250)	0	Nil	10
	area		2032	2018		<b>2016</b> (778)	0	Nil	10
						<b>2031</b> (250 + New)	0	Nil	10
						<b>2023</b> (604)	0	Nil	10

			Exhaust Dates F			Relief - Timing &	Population	Local	
Plan	Description	NPA 250	New NPA	NPA 778	NPA 604	Dates (area) [for the next relief only]	Туре	Affected by Number changes	Dial # D
5a	NPA 250 Distributed Overlay with 778 area Boundary Realignment at NPA 778 exhaust	2009	2024	2018	2025	2007 (250) 2016 (Bdy rlgn 778) 2022 (New) 2023 (604)	0 - 0 0	Nil Nil Nil Nil	10 10 10 10
5b	NPA 250 Distributed Overlay with 778 area Boundary Realignment coincident with NPA 250 Relief	2009	2024	2024	2025	<b>2007</b> (250+Bdy rlgn) <b>2022</b> (New) <b>2023</b> (604)	0 0 0	Nil Nil Nil	10 10 10
5c	NPA 250 Distributed Overlay, with 604 and 778 Boundary Realignments coincident with NPA 250 Relief	2009	2024	2024	2024	<b>2007</b> (250+Bdy rlgns) <b>2023</b> (250/604/778)	0	Nil Nil	10 10
Key									

#### **IDENTIFICATION & ASSESSMENT OF RELIEF OPTIONS** 7. **CONSIDERED BY THE RELIEF PLANNING COMMITTEE**

The Relief Planning Committee considered the IPD developed by the CNA and, based upon discussion, identified a total of XX potential Relief Options for consideration. These Options are listed as follows:

To be completed by the RPC.

#### 8. DIALLING CHANGES FOR LOCAL CALLS

The following tables reflect the dialling arrangement for Local calls only for Splits and Overlays.

The Toll call dialling arrangement is not impacted due to the NPA relief. The tables below identify recommended modifications to the local dialling plans in NPA 250, the NPA 250 Relief NPA, as well as in neighbouring NPAs 604 and 778.

#### Local Dialling Plan for Customers in NPA 250

Dial Plan Scenarios	Today	After 250 Split	After 250 Overlay
Landline to Wireless within NPA	7-digits	7-digits	10-digits
Landline to Wireless from NPA 250 to Adjacent NPAs	7-digits	10-digits	10-digits
Landline to Landline within NPA	7-digits	7-digits	10-digits
Landline to Landline from NPA 250 to Adjacent NPAs	7-digits	10-digits	10-digits
Wireless to Wireless within NPA	7-digits	7/10-digits	10-digits
Wireless to Wireless from NPA 250 to Adjacent NPAs	10-digits	10-digits	10-digits

#### Local Dialling Plan for Customers in 250 Relief NPA

Dial Plan Scenarios	Today	After 250 Split	After 250 Overlay
Landline to Wireless within NPA	N/A	7-digits	10-digits
Landline to Wireless from Relief NPA to Adjacent NPAs	N/A	10-digits	10-digits
Landline to Landline within NPA	N/A	7-digits	10-digits
Landline to Landline from Relief NPA to Adjacent NPAs	N/A	10-digits	10-digits
Wireless to Wireless within NPA	N/A	7/10-digits	10-digits
Wireless to Wireless from Relief NPA to Adjacent NPAs	N/A	10-digits	10-digits

#### Local Dialling Plan for Customers in Neighbouring BC NPAs 604/778

Dial Plan Scenarios	Today	After 250 Split	After 250 Overlay
Landline to Wireless within NPA	10-digits	10-digits	10-digits
Landline to Wireless from NPA 604/778 to Adjacent NPAs	10-digits	10-digits	10-digits
Landline to Landline within NPA	10-digits	10-digits	10-digits
Landline to Landline from NPA 604/778 to Adjacent NPAs	10-digits	10-digits	10-digits
Wireless to Wireless within NPA	10-digits	10-digits	10-digits
Wireless to Wireless from NPA 604/778 to Adjacent NPAs	10-digits	10-digits	10-digits

#### 9. PROPOSED SCHEDULE

The Relief Planning Committee developed the following proposed schedule using the best available information at this time. A number of assumptions were made with respect to the timeframes for certain events. Depending upon the Relief Option that is approved by the CRTC, the following proposed schedule will be modified accordingly.

	NPA 250 Relief Planning Timeline	Time	Cumulative	Start	End
		Required	Time	Date	Date
Number	Task or Event	(months)	(months)	MM-YY	MM-YY
1	CNA identifies NPA exhaust and notifies by e-mail CRTC staff, CSCN, NANPA & CISC that the NPA will exhaust*	2	2	02-04	04-04
2	CNA conducts R-NRUF and begins preparation of IPD	2	5	05-04	07-04
3	CRTC issues Public Notice to establish RPC and Interested Parties list. CNA announces the date for the initial NPA Relief Planning meeting, requests contributions and issues the initial press release.	3	8	08-04	10-04
4	CNA completes and distributes IPD to RPC	N/A	N/A	08-04	08-04
5	RPC participants review IPD	2	8	08-04	10-04
6	CNA chairs initial RPC meeting to present, explain and discuss the NPA Relief Planning process and the IPD. RPC schedules next meeting/conference call	N/A	8	10-04	10-04
7	CNA distributes revised IPD based upon initial meeting discussions	2	10	10-04	12-04
8	RPC participants provide comments on revised IPD as contributions to the RPC	RPC to complete balance of table			<mark>able</mark>
9	RPC participants review contributions, if any, prior to second meeting/conference call				
10	CNA chairs subsequent RPC meetings/conference calls to finalize Planning Document				
11	CNA revises and forwards Planning Document (PD) to the CISC and CRTC				
12	CISC reviews and forwards PD to the CRTC for approval				
13	CRTC initiates a process to approve/revise the PD and establish the Relief Option and Relief Date				
14	Interested Parties submit comments and reply comments to CRTC				
15	CRTC issues Decision & directs RPC to develop an NPA Relief Implementation Plan (RIP)	·			
16	CNA requests and obtains assignment of Relief NPA(s) from the NANPA and schedules meeting of RPC to develop a consensus RIP and Planning Letter (PL)				

	NPA 250 Relief Planning Timeline	Time	Cumulative	Start	End
		Required	Time	Date	Date
Number	Task or Event	(months)	(months)	MM-YY	MM-YY
17	CNA chairs RPC meeting to create Task Forces				
18	RPC and its Task Forces develop and obtain consensus on the various components of the RIP and PL (a series of meetings/conference calls might be required)				
19	CNA forwards consensus RIP to CISC and the PL to NANPA				
20	CISC reviews and forwards RIP to the CRTC for approval				
21	CRTC approves RIP and notifies Interested Parties				
22	CNA issues second media release and sends approved RIP to NANPA, TRA, LNP Consortium and RPC members				
23	Task Forces, Telecommunications Service Providers and users execute the RIP				
	Permissive Dialling Period in the event of a Split / 7- to 10- digit Dialling Transition Period in the event of an Overlay (To be determined based upon CRTC approved				
24	Relief Option)				
25	Relief Date (generally 12 to 18 months prior to the Projected Exhaust Date) (TBD)				
26	CNA submits Final Report to CISC within two months of Relief implementation				
27	Projected Exhaust Date			06-09	

<sup>\*</sup> When an NPA is projected to exhaust within a 72 months period, the CNA must commence the Relief Planning process.
\*\* In the event that a new R-NRUF or actual demand indicates that the exhaust date will change significantly, the CNA may convene a meeting of the NPA Relief Planning Committee to review the issue and make a recommendation to the CISC and CRTC.

#### 10. RECOMMENDATIONS

Based upon its analysis of the Relief Options, the Relief Planning Committee recommends that:

To be completed by RPC.

#### 11. JEOPARDY CONTINGENCY PLAN

The CNA has developed the following Jeopardy Contingency Plan (JCP), based on the template contained in Appendix I to the Canadian NPA Relief Planning Guidelines, for inclusion in the IPD for NPA 250.

The following measures shall be implemented by all CO Code Holders in NPA 250 once approved by the CRTC and following the declaration of a Jeopardy Condition by the CNA.

- During a Jeopardy Condition, code applicants shall submit all code applications and related correspondence for the jeopardy NPA to CRTC staff in addition to the CNA. The CNA will work closely with CRTC staff in the analysis of these applications.
- 2) Telecommunications Service Providers (TSPs) will implement the following conservation methods when a Jeopardy Condition is declared:
  - a) age disconnected residential telephone numbers for a maximum of two months;
  - b) age disconnected wireless telephone numbers for a maximum of three months;
  - c) age disconnected business telephone numbers for a maximum of six months. Under special circumstances, the six month aging limit for business telephone numbers may be extended to twelve months if required to accommodate local directory publishing dates for high volume call-in applications (e.g., heavily advertised local business numbers such as radio talk shows, food ordering services, ticket sales, chat lines), or for numbers associated with public service emergency applications or for numbers advertised in directories for which customers have requested reference of calls;
  - d) return all CO Codes that are not being used nor intended to be used to directly serve customers to the assignment pool within two months (e.g., plant test codes);
  - e) all CO Code Holders should work towards, and encourage existing customers, to either activate or return the reserved numbers in order to bring the reserved quantity down to a maximum of 10% of the quantity of numbers In-Service for that customer;
  - f) the quantity of reserved numbers shall not be increased by new reservation requests by existing customers to more than 10% of the quantity of numbers in service for that customer. In the case of new customers, number reservations shall be limited to 10% of the total quantity of telephone numbers being placed into service for that customer;
  - g) within 45 days from the date that the CNA declares a Jeopardy Condition, CO Code Holders shall submit a Part 1 Form for each remaining reserved CO Code either returning the reserved CO Code to the CNA or requesting assignment of the reserved CO Code, as per these Special Conservation Procedures. Once the 45-day period has elapsed, the CNA shall make any reserved CO Codes that has not been assigned and for which it has not received a Part 1 Form available for general assignment. Within 60 days from the date that the CNA declares a Jeopardy Condition, the CNA shall report to CRTC staff and the RPC as to how many of these codes have been assigned or made available for general assignment.
  - h) reservations of CO Codes will not be permitted until NPA relief is provided.
  - i) for all CO Codes that were assigned prior to the Jeopardy Condition being declared, the CO Codes must be placed In-Service within three months of the effective date for CO Code activation in the network, or within three months of the date that the Jeopardy Condition was declared. The CNA shall initiate reclamation procedures for all CO Codes that have not been placed In-Service within this timeframe.
  - reclaimed CO Codes will be made available for general assignment after a three-month aging period.
- 3) For new applications for Initial Codes, each CO Code Holder shall certify that the CO Code will be activated in the network and placed in service within four months of the date of application for the Code. If the CNA does not receive a Part 4 Form within this timeframe, confirming that the CO

Code has been placed in service, the CNA will initiate reclamation measures. If the Code Holder can demonstrate that, due to circumstances beyond its control, that the In-Service date has been delayed not more than six months from the original application date, then the CNA may grant an extension to the In-Service date, so long as the In-Service date is not more than six months beyond the original application date. If the In-Service date has been delayed more than six months from the original application date, then the CNA shall reclaim the Code.

- 4) When applying for a CO Code for growth, CO Code Holders shall, for the switching entity/POI:
  - a) complete and submit the attached Telephone Number Utilization Report Form;
  - b) certify that all held telephone numbers have been released;
  - c) certify that reserved numbers do not exceed ten percent of the total quantity of numbers;
  - d) certify that all existing CO Codes per service provided by that switching entity or POI, are projected to exhaust within four months and provide supporting documentation (i.e., complete Appendix B Months to Exhaust Certification Worksheet); and,
  - e) certify that each reseller's/dealer's inventory has been reduced to an amount equal to two times the highest month's end customer number assignment rate from the previous year for that reseller/dealer. This certification must be provided at the time of applying for a CO Code for growth or within 60 days from the date that the CNA declares a Jeopardy Condition, whichever is later. In the event that the Code Applicant does not submit the certification within 60 days of the date the CNA declares a Jeopardy Condition, then the CNA shall advise Commission staff. Exceptional issues (e.g., inventory provision for start-up resellers/dealers, inventory provision for resellers/dealers that anticipate activations in excess of historical trends, and resellers/dealers that refuse to cooperate in reducing their inventories) may be referred to the Commission for resolution.
- Any CO Codes for growth assigned after the implementation of this JCP must be activated in the network and placed In-Service within four months of assignment. In the event that a CO Code Holder is unable to place the CO Code In-Service within four months of the date of assignment, the CO Code Holder must submit a written request for extension to the CNA. Such written requests must include documentation explaining the reason(s) for the missed date and proposing the new In-Service date. If the explanation includes reasons beyond the control of the CO Code Holder, the CNA may extend the In-Service date a maximum of one month. If the CO Code Holder does not place the CO Code In-Service within the one-month extension, the CNA shall reclaim the CO Code immediately at the end of the one-month extension.
- 6) A TSP that has multiple switching entities within an exchange area shall examine the possibility of, and implement where feasible, number sharing between those switches as a potential method to delay requirements for additional CO Codes.
- 7) The CNA will compare the initial J-NRUF input to the recent NRUF inputs, in order to assess forecasting trends. The CNA shall monitor all inputs and shall test them for reasonableness in consultation with the Telecommunications Service Provider. If the CNA is dissatisfied with the reasonableness, or the rationale provided for the deviations, then the matter will be referred to the Commission.
- 8) The CNA will request subsequent J-NRUF input from all potential and current CO Code Holders quarterly until 3 months before relief is provided. The initial J- NRUF input will be used as a baseline for comparison of subsequent J- NRUF input as well as to evaluate the effectiveness of the JCP. The CNA shall monitor all J- NRUF inputs and shall test them for reasonableness in consultation with the Telecommunications Service Provider. If the CNA is dissatisfied with the reasonableness, or the rationale provided for the deviations, then the matter will be referred to the Commission.

- 9) In the absence of a J- NRUF from a Code Holder or proposed Competitive Local Exchange Carrier (CLEC), the CNA will request a complete J- NRUF from that entity prior to the assignment of an initial CO Code from the pool of CO Codes set aside for Initial Code Applicants.
- 10) When a CO Code Applicant requests more CO Codes than it identified in its most recent J- NRUF forecast, the CNA will discuss the matter with the Code Applicant and if the Code Applicant wishes to proceed with the request, the CNA will forward the request to CRTC staff for consideration.
- 11) The CO Codes identified in the NPA CO Code Inventory Chart as "Assignable CO Codes in a Jeopardy Condition" will be assigned in the order determined by the RPC after all CO Codes which are "Available for Assignment as of dd/mm/yyyy" have been assigned.
- 12) After each J- NRUF, the CNA shall provide the Commission and the RPC participants with a report providing an updated NPA CO Code Inventory Chart for the NPA in jeopardy as well as the aggregate results of the most recent J- NRUF.
- 13) This JCP shall remain in effect until NPA Relief has been implemented.
- 14) Exceptional issues or concerns may be referred by the CNA, or by individual entities (with a courtesy copy to the CNA), to the Commission for resolution.
- 15) If the CNA determines that the implementation of the JCP has not extended the Projected Exhaust Date of the NPA beyond the Relief Date, then it is anticipated that further CO Code conservation and assignment procedures will be ordered by the Commission (e.g., rationing, lottery, etc.).

#### **Telephone Number Utilization Report**

Entity Name:	Contact name:	
Address :	City, Prov/Terr, Postal code:	
Telephone:	Facsimile:	
E-Mail:	<del></del>	-
Date :		
Telephone Number Utilization for:	Switch/POI CLLI:	
	Exchange Name	Province / Territory :

	Т		Quantities of Telephone Numbers							
		Portable	Reseller				Ported			%
NPA	NXX	(Y or N)	Inventory	Assigned	R&H	Admin	Out	Available	Aging	Utilization
-										
	ļ									
	<u> </u>									
10	TAL									

<sup>%</sup> Utilization = (Reseller Inventory+Assigned+R&H+Admin+Ported Out+Aging)/(100)

#### NPA 250 CO Code Inventory Chart

The Chart below will be completed in the event the CNA declares a Jeopardy Condition.

The Chart shown below summarizes the status of CO Codes in NPA 250 as at [CNA ENTER DATE HERE]. It identifies 29 "Unassignable" and 11 "Assignable CO Codes in a Jeopardy Condition". The "Assignable CO Codes in a Jeopardy Condition" shall only be made available for assignment in the event that all other CO Codes available for assignment are assigned. The order of assignment of the "Assignable CO Codes in a Jeopardy Condition" would be as indicated in the chart.

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Α	Total CO Codes In an NPA (NXX format)	800
	Unassignable CO Codes:	
	N11 Service Codes (211, 311, 411, 511, 611, 711, 811, 911)	8
	Special Use Codes (555, 950 & 976)	3
	Protected Codes	0
	Home NPA(s) (XXX)	1
	Reserved NPAs for Future Relief of Home NPA (see note 1)	2
	Current Neighboring NPA (see note 2)	2
	Reserved NPAs for Future Relief of Neighboring NPAs	9
	Plant Test Codes (958 & 959)	2
	Special 7-digit Dialing Codes (610 & 810)	2
В	Subtotal	29
С	Net (C=A-B)	771
	Assignable CO Codes in a Jeopardy Condition:	
	911 Misdial Codes (912, 914 & 915) (assign 1st)	3
	N00 Codes (assign 2nd)	8
D	Subtotal	11
E	Net (E=C-D)	760
F	Assigned Codes as of XXXXXXXXX	
G	Net (G=E-F)	
Н	Codes Set Aside for Future New Entrants	3
I	Available for Assignment as of XXXXXXX (I=G-H)	
J	Available for Assignment in Jeopardy Condition (J=D+I)	

- (1) The CNA advises that this NPA will exhaust 1 time over the 20 year forecast period.
- (2) Current neighbouring NPAs are: NPA 604, 778, 403, 780, 907, 867, 360, 564, 509, 208, and 406

# NPA 250 INITIAL PLANNING DOCUMENT ANNEXES