

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)
NEUSTAR, INC., ON BEHALF OF THE)
INDIANA TELECOMMUNICATIONS) CAUSE NO. 44513
INDUSTRY, FOR APPROVAL OF NPA)
RELIEF PLAN FOR THE 317 NPA)

JOINT SUBMISSION OF PROPOSED ORDER

The Indiana Broadband and Technology Association¹ (“IBTA” or “Association”), the Indiana Office of Utility Consumer Counselor (“OUCC”), and Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana, by counsel, respectfully submit their Joint Proposed Order in the above-captioned Cause.

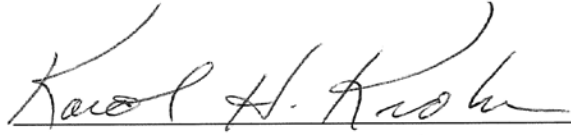
Respectfully submitted this 10th day of March, 2015,

By /s/ Jeremy L. Fetty

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ORDER OF THE COMMISSION

Presiding Officers:

Carol A. Stephan, Commissioner Chair
David E. Veleta, Administrative Law Judge

On July 10, 2014, Petitioner, NeuStar, Inc. (“Neustar”), the North American Numbering Plan Administrator (“NANPA”) filed its petition (the “Petition”) with the Indiana Utility Regulatory Commission (“Commission”) initiating the above-captioned Cause. In the Petition, NeuStar, in its role as the neutral third party Numbering Plan Area (“NPA”) Relief Planner for Indiana under the North American Numbering Plan and on behalf of the Indiana telecommunications Industry (the “Industry”), petitioned the Commission to approve the Industry’s consensus recommendation for an all-services distributed overlay of the 317 area code as the preferred form of relief for the 317 NPA. The recommendations to the Commission were 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 317 NPA will be exhausted during the second quarter of 2017.

Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana (“AT&T Indiana”), and the Indiana Broadband and Technology Association² (“IBTA”) filed Petitions to Intervene, which were granted by the Presiding Officers in docket entries.

Pursuant to notice and as provided for in 170 I.A.C. § 1-1.1-15, a Prehearing Conference in this Cause was held at 9:30 a.m. on August 19, 2014 in Judicial Courtroom 222 of the PNC Center, 101 West Washington Street, Indianapolis, Indiana. Counsel for Neustar and the Indiana Office of Utility Consumer Counselor (“OUCC”) appeared and participated at the Prehearing Conference. Representatives of AT&T Indiana and the IBTA appeared at the Prehearing Conference, but neither had petitioned to intervene at that time. In addition, several interested parties attended the Prehearing Conference. Prior to the opening of the record and with the consent of all parties in attendance, an informal discussion was held regarding procedural and scheduling matters in this Cause. On September 3, 2014, the Commission issued its Prehearing Conference Order setting forth a procedural schedule for the parties to file initial testimony and exhibits, constituting their respective cases-in-chief, a filing deadline for

² f/k/a Indiana Telecommunications Association.

responsive testimony and setting an evidentiary hearing date, consistent with the agreement of the parties regarding the procedural schedule.

On September 10, 2014 and September 18, 2014, the Presiding Officers issued Docket Entries setting the schedule for five public field hearings that were geographically dispersed throughout the 317 NPA service area in Central Indiana, to be conducted by the Commission.

Pursuant to notice, duly published as required by law, public field hearings were held on September 26, 2014 in Indianapolis, Indiana; October 1, 2014 in Carmel, Indiana; October 14, 2014 in Franklin, Indiana; October 29, 2014 in Danville, Indiana; and December 1, 2014 in Greenfield, Indiana. At each of the public field hearings, the OUCC introduced the public's oral and written comments on the area code relief plans. The OUCC moved for admission and the Commission admitted the public's comments into the evidentiary record of the above-captioned Cause.

In accordance with the established procedural schedule, on September 18, 2014, Petitioner Neustar prefiled direct testimony and exhibits, constituting its case-in-chief. On January 6, 2015, AT&T Indiana, the OUCC, and the IBTA prefiled direct testimony constituting their respective cases-in-chief.

Pursuant to notice and as provided for in 170 I.A.C. § 1-1.1-15, proof of which was incorporated into the record by reference and placed in the official files of the Commission, the Commission convened an evidentiary hearing in this Cause at 9:30 a.m. on February 10, 2015 in Judicial Courtroom 222 of the PNC Center, 101 West Washington Street, Indianapolis, Indiana. Petitioner Neustar, the IBTA, and the OUCC appeared and were duly represented by counsel. No members of the general public appeared or sought to testify at the evidentiary hearing.

At the evidentiary hearing, Neustar offered into evidence the prefiled direct testimony of Mr. D. Wayne Milby as Petitioner's Exhibit 1; Exhibit A of Mr. Milby's testimony as Petitioner's Sub-exhibit A; and Exhibit B of Mr. Milby's testimony as Petitioner's Sub-exhibit B. The IBTA offered into evidence the prefiled direct testimony and exhibit of Mr. Alan I. Matsumoto as IBTA Exhibit 1. The prefiled direct testimony of Mr. George Guerra was offered into evidence as AT&T Indiana Exhibit 1. The OUCC offered into evidence the prefiled direct testimony of Mr. Ronald L. Keen as Public's Exhibit 1. No party objected to the admission of any of the evidence and it was all accepted into the record.

Having considered the evidence of record and based upon the applicable law, the Commission now finds:

1. Notice and Jurisdiction. Due, legal, and timely notice of these proceedings was given and published by the Commission as required by Indiana law. The proofs of publication of the notice of the evidentiary hearing have been incorporated into the record of this proceeding. NANPA filed the Petition on behalf of the Indiana telecommunications Industry participants, who are Communications Service Providers ("CSP") and public utilities, as those terms are defined in Ind. Code §8-1-2 and §8-1-2.6 and subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana. The Commission has

jurisdiction over the subject matter of this Cause in the manner and to the extent provided under state and federal telecommunications laws, including, but not limited to Ind. Code §8-1-2.6, 47 U.S.C. § 251(e)(1), and 47 C.F.R. § 52.19. No party has challenged the Commission's determination of jurisdiction. Therefore, the Commission has jurisdiction over the CSPs and the subject matter of this proceeding.

2. Summary of the Evidence Presented.

A. Petitioner's Case in Chief Evidence. NANPA sponsored the Direct Testimony and Exhibits of Mr. D. Wayne Milby, Senior Numbering Plan Area Relief Planner for the Eastern Region of the North American Numbering Plan. Mr. Milby testified that the 2014 Number Resource Utilization Forecast ("NRUF") and NPA Exhaust Analysis indicated that the 317 NPA would exhaust during the second quarter of 2017. NANPA notified the Industry and the Commission that relief planning needed to be addressed. On May 29, 2014, NANPA facilitated an Industry meeting, via conference call, for the purpose of presenting NPA relief alternatives to the Industry and to ultimately allow Industry members to come to consensus on a single relief plan to be presented to the Commission. Prior to the May 29 meeting, NANPA prepared and distributed an Initial Planning Document ("IPD") which described three relief alternatives for the 317 NPA.

Mr. Milby testified that the three relief alternatives were an all services distributed overlay and two concentrated overlays. The second concentrated overlay alternative was proposed by an Industry member prior to the May 29 relief planning meeting. At the May 29, 2014 meeting, the Industry discussed the pros and cons of each of the three relief alternatives and reached consensus to eliminate all alternatives except for Alternative No. 1, the all-services distributed overlay. After reaching consensus on the recommended relief plan, on July 10, 2014, NANPA filed its Petition with the Commission on behalf of the Industry notifying the Commission of the Industry's consensus plan to implement an all-services distributed overlay as the means of relief for the 317 NPA.

Mr. Milby's testimony summarized the descriptions of all of the relief alternatives. Alternative No. 1, the all-services distributed overlay, would superimpose a new NPA code over the same geographic area as the existing 317 NPA. All existing customers would retain the 317 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the all-services distributed overlay would require 10-digit dialing for all calls within and between the 317 NPA and the new NPA. Toll calls within the home NPA would be dialed using 1+10 digits. Toll calls crossing NPA boundaries would require 1+10 digit dialing and operator assisted calls would require 0+10 digit dialing. The all-services distributed overlay has a projected life of 49 years.

For the concentrated overlay alternatives (Alternatives Nos. 2 and 3), a new NPA code would be assigned to only certain rate centers in the same geographic area occupied by the existing 317 NPA. Customers would retain their current telephone numbers; however, 10-digit dialing would be required by all customers within and between NPAs in the rate centers within the concentrated overlay area. Those customers not located within the overlay area would retain seven-digit local dialing until the remaining 317 CO codes were assigned. The overlay then

would be extended to all rate centers in the 317 NPA. All remaining 317 CO codes would be assigned only to the area outside of the overlay. At exhaust of the 317 NPA, all future code assignments would be made in the overlay area code. For concentrated overlay Alternative No. 2, the concentrated overlay would only be distributed over the Indianapolis rate center. The projected time before the need for expansion of the overlay for Alternative No. 2 is 6.3 years. The projected life of the area code is 49 years. Concentrated overlay Alternative No. 3 is similar to Alternative No. 2. The concentrated overlay for Alternative No. 3 would include the Indianapolis rate center, as well as all of the adjacent rate centers that surround the Indianapolis rate center: Carmel, Fishers, Oaklondon, Cumberland, Action, Greenwood, West Newton, Plainfield, Brownsburg and Zionsville. The projected time before the need for expansion of the overlay Alternative No. 3 is 18.4 years. The projected life of the area code is 49 years.

Mr. Milby sponsored exhibits reflecting that the Industry members discussed the pros and cons of each alternative at the relief planning meeting and reached consensus to eliminate all alternatives except for Alternative No. 1, the all-services distributed overlay. The Industry reached consensus to eliminate Alternatives Nos. 2 and 3, the concentrated overlays, because these alternatives would require two rounds of customer education notices, the second when the overlay is expanded to cover the entire area code; and two full relief efforts, thereby increasing the opportunity for customer confusion. For service providers that use one switch for multiple NPAs, a concentrated overlay is difficult to implement with complicated translations. In addition, a concentrated overlay discriminates against customers inside the overlay area that have to dial 10-digits immediately as opposed to those that retain 7-digit dialing outside of the concentrated overlay. Projecting the exhaust of a concentrated overlay requires the assessment of data at the rate center level which may change or become altered over time.

According to Mr. Milby, the Industry reached consensus to recommend to the Commission Alternative No. 1, the all-services distributed overlay, as the preferred means of relief for the 317 NPA. He also testified that the Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementing the all-services distributed overlay. The schedule includes recommended intervals for each implementation phase. The Industry recommended six months for network preparation and customer education followed by six months for permissive 10-digit dialing and continued customer education. Mandatory 10-digit dialing would begin at the end of the permissive dialing period. The first code activation for codes assigned from the new overlay NPA would take place one month after mandatory 10-digit dialing begins.

B. AT&T Indiana's Case in Chief Evidence. AT&T Indiana sponsored the direct testimony of Mr. George Guerra which supports NANPA's recommendation that the Commission approve the Industry's unanimous consensus for an all-services distributed overlay as the preferred form of relief, as well as the 13-month implementation schedule proposed by NANPA. Mr. Guerra testified that such actions will minimize inconvenience to consumers, help avoid denial of service to new customers prior to the anticipated exhaust of the 317 NPA, and support the continuing trend throughout the United States to use the all-services distributed overlay as the preferred form of area code relief.

Mr. Guerra described the all-services distributed overlay, in which a new NPA code would cover the exact same geographic area currently served by the 317 NPA. Mr. Guerra explained that with an overlay, all existing customers keep their current 317 numbers and new customers receive phone numbers from the new area code once the supply of 317 numbers is exhausted. Mr. Guerra explained that with an overlay, consistent with FCC regulations, all customers would be required to dial all ten digits when placing a local call.

In describing why AT&T Indiana supports this approach, Mr. Guerra explained that there are several advantages to implementing the all-services distributed overlay: (1) it is the most equitable approach to area code relief because all customers are treated equally and all existing customers can keep their 317 numbers; (2) it can be easily implemented and adapted to by consumers because they do not have to change their numbers and are already familiar and comfortable with ten-digit dialing due to the proliferation of wireless communications, where ten-digit dialing is the common practice; and (3) it provides additional benefits, including offering the best, simplest, and most efficient long-term relief plan, preserving the current geographic identity of the 317 NPA, avoiding division of communities of interest, results in a more efficient utilization of area codes, avoiding impacts on non-telephone company databases that use ten-digit phone numbers as search criteria, and no adverse impact for 9-1-1 systems in the current 317 NPA.

Mr. Guerra testified that an overlay is the most efficient relief type with regard to number utilization. He stated that over the past eight years, state utility commissions have nearly unanimously (with just one exception in 2006) found overlay relief to be the most preferred and least disruptive relief option, confirming the superiority and efficiency of this recommended approach. Mr. Guerra noted future overlay area code relief would be seamless and virtually transparent to most customers and if such future relief were necessary, another new area code could easily be placed over the relevant 317 geographic area.

Mr. Guerra noted that the most significant impact of an all-services distributed overlay is its effect on local dialing patterns, since it would require mandatory ten-digit dialing for local calls within both the existing and overlay NPAs. However, Mr. Guerra explained that this impact is minor in today's telecommunications environment, where customers are already comfortable with making local calls between area codes and dialing ten digits as part of their routine calling patterns.

Mr. Guerra also outlined why the Industry-endorsed 13-month implementation schedule was appropriate, noting that based on the Industry's past experience with implementing overlays, providing six months of customer education and network preparation, followed by six months of permissive seven or ten-digit digit dialing, followed by one month of mandatory ten-digit dialing before activating the new NPA provides adequate time for preparation and customer education, resulting in smooth implementation and the avoidance of any delay or denial of service to customers due to the unavailability of new NXX codes.

Mr. Guerra explained key steps in the 13-month implementation schedule, noting that current dialing patterns within the area code are maintained during the permissive dialing period, but customers also can begin dialing all calls with ten digits in order to become accustomed to

this method of dialing before it becomes mandatory. The permissive ten-digit dialing period is beneficial because it allows customers to modify their on-premise communications equipment and automatic dialers for ten-digit dialing in advance of the mandatory ten-digit dialing date. Permissive ten-digit dialing is particularly helpful to alarm companies because it allows them a long lead time to modify alarm dialers on customer premises to dial ten-digits for local calls to the central alarm reporting stations or emergency services if those dialers had been previously programmed to dial just seven digits. With respect to the timing of the conversion to mandatory ten-digit dialing, Mr. Guerra believes it should occur on a weekend, but not on the weekend of any network-critical holiday, such as Mother's Day, because the heavy call volumes during these periods could exacerbate customer impacts during the cutover to mandatory ten-digit dialing. For the same reason, Mr. Guerra advises mandatory ten-digit dialing should not commence, if at all possible, during the Christmas holiday season. Due to the sheer amount of network programming required by carriers with multiple central office switches and the finite supply of programmers, mandatory ten-digit dialing should not be implemented on the same weekend as any other mandatory dialing change.

For these reasons, on behalf of AT&T Indiana, Mr. Guerra recommended that the Commission adopt the Industry's unanimous consensus for an all-services distributed overlay relief plan for the 317 NPA, including the associated 13-month implementation period.

C. The IBTA's Case in Chief Evidence. The IBTA sponsored the direct testimony and exhibit of Mr. Alan I. Matsumoto. Mr. Matsumoto's direct testimony described the Industry's consensus recommendation of an all-services distributed overlay of the 317 NPA as the preferred form of relief. The all-services distributed overlay would superimpose (overlay) a new NPA over the same geographic area of the existing 317 NPA and all current customers would retain the 317 area code and keep their existing telephone numbers. One month after mandatory 10-digit dialing begins, new numbers may be assigned from the new overlay area code. Mr. Matsumoto noted that in accordance with FCC directives, customers would be required to dial the full 10-digits for all local calls both within and between the 317 NPA and the new NPA with the all-services distributed overlay. Mr. Matsumoto described the Industry's recommendation for a 13-month implementation period. Mr. Matsumoto testified that the IBTA supports the Industry's consensus recommendation for an all-services distributed overlay and the associated 13-month implementation period.

Mr. Matsumoto described the Commission's five public field hearings and indicated the IBTA participated in each of the five public field hearings and he personally attended each hearing. The IBTA presented oral and written comments in support of the all-services distributed overlay and listened to consumer comments and was available to address any of their concerns. Mr. Matsumoto testified that, at the public field hearings, there were no public comments in opposition to the all-services overlay as the preferred method for 317 NPA relief. The IBTA's written comments were attached to Mr. Matsumoto's direct testimony as Exhibit A.

At the public field hearings, the IBTA discussed the advantages and disadvantages to providers and customers of the all-services distributed overlay, although from its perspective, the overlay plan is overwhelmingly positive. The all-services distributed overlay allows all current customers to retain their numbers and does not split cities, counties or communities of

interest. The all-services distributed overlay minimizes administrative burdens and costs for residential and business customers alike, by precluding the need for changes to stationery, personal checks, business cards, advertising, websites, etc., as a result of the overlaid code, unless they currently show only seven-digit numbers. The all-services distributed overlay can be implemented in a relatively short time frame, to provide new numbering resources on a nondiscriminatory basis to all service providers and provides a long period of NPA relief. The main disadvantage to the all-services distributed overlay is that ten-digit dialing would be required for calls both within and between the 317 NPA and the new NPA. However, that disadvantage is mitigated in large part due to the growth of wireless phones that are able to store 10-digit numbers. Mr. Matsumoto stressed the need for customers to be aware that with the all-services overlay, any medical, alarm, and security services equipment with a 317 area code number and programmed to dial only seven digits would need to be updated to dial the area code and 7-digit telephone number for all calls within the 317 area code.

The IBTA noted that the Industry considered two concentrated overlays: (1) an area code overlay that would be assigned to only the Indianapolis rate center; and (2) an area code overlay for just the Indianapolis and adjacent rate centers. The Industry rejected the concentrated overlays because these alternatives would require two rounds of customer education notices and two area code relief efforts, thereby increasing the potential for customer confusion. In addition, a concentrated overlay requires customers inside the overlay area to dial 10-digits immediately, while maintaining 7-digit dialing outside of the concentrated overlay area.

Mr. Matsumoto testified that the all-services distributed overlay best meets the goals of: (1) minimizing inconvenience to customers; (2) minimizing costs to customers and the Industry; (3) generally providing a longer period of relief from future change; (4) simplifying implementation of an additional new overlay area code in the same geographic area in the future, as needed; and (5) treating customers and carriers fairly and equitably. Accordingly, he urged the Commission to adopt the all-services distributed overlay proposal for the 317 area code so the Industry may move forward with the NPA relief effort that the IBTA believes is in the best interests of Central Indiana consumers.

Mr. Matsumoto testified that the public generally supports the all-services distributed overlay for 317 NPA relief, as well. He noted that at the five public field hearings, there were no public comments in opposition to the all-services overlay as the preferred method for 317 NPA relief. No party advocated any of the concentrated overlay options. There were no public comments at the public field hearings recommending any other form of 317 NPA relief.

With all parties supporting the all-services distributed overlay as the appropriate form of relief for the 317 NPA, Mr. Matsumoto reiterated his recommendation for the all-services distributed overlay and respectfully requested that the Commission approve the consensus recommendation as the method for 317 NPA relief.

D. The OUCC's Case in Chief Evidence. The OUCC sponsored the direct testimony of Mr. Ronald L. Keen. Mr. Keen testified the OUCC participated in a number of meetings with the Petitioner and representatives of Indiana's telecommunications Industry, both before and after NeuStar filed its Petition. The OUCC also participated in the five public field

hearings and reviewed Public comments to identify any customer concerns and preferences among the area code relief options.

With respect to customer preference on the proposed all-services distributed overlay solution for 317 NPA relief, Mr. Keen noted the relatively low attendance at the public hearings and the small number of customers who submitted written comments, that were attached to his testimony, as an indication that consumers no longer view the choice between different forms of area code relief as a significant issue.

Mr. Keen identified a key reason customers might prefer the area code overlay as the ability for customers to keep their current telephone numbers, including their current area codes. He noted the importance to businesses and other institutional customers since an area code overlay allows them to avoid the inconvenience and expense of replacing current signage, revising current advertisements, purchasing new business stationery, sending change notices to customers, suppliers, business contacts and associates; or revising listings in local, national and global directories.

On behalf of the OUCC, Mr. Keen recommended that the Commission approve the proposed all-services fully-distributed area code overlay for the 317 area code and indicated it cost-effectively addresses the need for additional numbering resources while minimizing adverse impacts on affected communications service providers and their customers.

3. Commission Analysis and Findings.

A. Relief Alternatives for the 317 NPA. The Commission is persuaded by Mr. Milby's testimony that the Industry members thoroughly discussed the pros and cons of each alternative at the relief planning meetings to reach a consensus for the all-services distributed overlay. The Commission agrees with the Industry decision to eliminate Alternatives No. 2 and 3, the concentrated overlays, because these alternatives would require two rounds of customer education notices, the second when the overlay is expanded to cover the entire area code and two full relief efforts, thereby increasing the opportunity for customer confusion. For service providers that use one switch for multiple NPAs, the Industry noted a concentrated overlay is difficult to implement with complicated translations. Finally, the Industry expressed concerns over concentrated overlays because customers are not all treated equally due to the staggered implementation of ten-digit dialing.

The Commission acknowledges Mr. Guerra's testimony in support of all-services distributed overlay that over the past eight years, state utility commissions have nearly unanimously (with just one exception in 2006) found overlay relief to be the most preferred and least disruptive relief option. Mr. Guerra also noted that if future relief were necessary, another new area code could easily be placed over the 317 geographic area.

The Commission also recognizes the importance of public comments regarding the all-services distributed overlay as the preferred form of NPA relief. Mr. Matsumoto testified that he attended all five public field hearings and there were no public comments in opposition to the all-services overlay and no expressions of support for the concentrated overlay options. The

comments admitted into evidence during the public field hearings or submitted directly to the OUCC before the testimony pre-filing date are consistent with Mr. Matsumoto's conclusions. On behalf of the OUCC, the statutory representative of the public, Mr. Keen concluded that the public comments indicate to the OUCC that consumers no longer view the choice between different forms of area code relief as a significant issue.

Based on the record evidence, we are persuaded that the all-services distributed overlay permits customers to keep their existing telephone numbers and find that it is the best option for 317 NPA relief. We agree with the OUCC, AT&T Indiana, and the IBTA that the all-services distributed overlay minimizes the inconvenience, costs, and burdens on customers and service providers. Therefore, we find that the Industry's consensus recommendation of the all-services distributed overlay as the preferred means of relief for the 317 NPA should be approved.

B. Implementation Schedule. Mr. Milby testified that the Industry reached consensus on a 13-month schedule for implementing the all-services distributed overlay. He stated the schedule includes recommended intervals for each implementation phase. According to Mr. Milby, the Industry recommended six months for network preparation and customer education followed by six months for permissive 10-digit dialing and continued customer education. Mandatory 10-digit dialing would begin at the end of the permissive dialing period. The first code activation for codes assigned from the new overlay NPA would take place one month after mandatory 10-digit dialing begins. Mr. Guerra outlined why the Industry-endorsed 13-month implementation schedule was appropriate, noting that based on the Industry's past experience with implementing overlays, the recommended intervals for each implementation phase provide adequate time for preparation and customer education, resulting in smooth implementation. Mr. Matsumoto also testified in support of the 13-month implementation period.

We agree with the Industry consensus that the 13-month schedule for implementing the all-services distributed overlay is appropriate. We note the Industry's recommended intervals for each implementation phase are based on its past experience with implementing overlays and therefore we approve the implementation schedule. With respect to Mr. Guerra's recommendations on the timing of the conversion to mandatory ten-digit dialing, we leave those considerations to the Industry implementation committee.

Further, we find it is appropriate for the Commission to be apprised of customer education efforts and the progress of relief implementation as these procedures will potentially generate inquiries to the Commission. Therefore, we direct the Industry implementation committee to formulate an implementation plan describing at a high level the technical and communications aspects of implementation and to submit such a plan to the Commission and the OUCC within sixty (60) days of the date of this Order.

C. Customer Education. We direct the Industry implementation committee to formulate a customer education plan for the implementation of the area code overlay for affected customers and to submit such a plan to the Commission and to the OUCC within sixty (60) days of the date of this Order. This plan shall specifically include: best practices recommended by the Industry which are flexible enough to accommodate different types of communications service

providers, and sufficiently robust to reach the multiple stakeholders impacted; clearly identified procedures and contacts within each company charged with responsibility of responding to customer area code questions, together with a means for communicating them to customers and other key stakeholders; and provisions by each company for direct communications with emergency dispatch operators (e.g., 911).

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:

1. Consistent with the findings above, Neustar's Petition on behalf of the Indiana telecommunications Industry for the consensus recommendation of an all-services distributed overlay of the 317 NPA as the preferred form of relief for the 317 NPA is hereby approved.

2. Consistent with our findings above, the Industry's recommendation of a 13-month schedule for implementing the all-services distributed overlay is hereby approved. The Industry implementation committee responsible for the implementation of such plan is directed to begin preparations for the implementation of this plan in accordance with the findings set forth herein.

3. We direct the Industry implementation committee to formulate an implementation plan describing at a high level the technical and communications aspects of implementation and to submit such a plan to the Commission and the OUCC within sixty (60) days of the date of this Order.

4. We direct the Industry implementation committee to formulate a customer education plan for the implementation of the all-services distributed overlay for affected customers and to submit such a plan to the Commission and to the OUCC within sixty (60) days of the date of this Order.

5. This Order shall be effective on and after the date of its approval.

COMMISSIONERS STEPHAN, MAYS-MEDLEY, HUSTON, WEBER AND ZIEGNER CONCUR.

APPROVED:

I hereby certify that the above is a true and correct copy of the order as approved.

Brenda A. Howe
Secretary to the Commission

**CERTIFICATE OF SERVICE
IURC CAUSE NO. 44513**

The undersigned counsel hereby certifies that on the 10th day of March, 2015, the foregoing “Joint Submission of Proposed Order” was served upon the following counsel by placing a copy in U.S. first class mail prepaid, by hand delivery, by facsimile and/or electronic transmission, addressed to:

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