

1.0 INTRODUCTION

By cover letter dated January 10, 1999, the Industry Numbering Committee (INC) forwarded to the FCC and other regulators the “INC Interim NANP Expansion Report.” The cover letter explained that the INC has studied many options to expand the North American Numbering Plan (NANP), and has reached a point in its deliberations at which confirmation of certain assumptions is necessary. The letter further states:

“These assumptions require the mutual consent of all NANP nations. The INC has considered the technical merits of the options, but does not make policy decisions. If NANP nations support the two assumptions, then further work can be done by INC to develop its recommendations regarding NANP expansion. The date of NANP exhaust is currently uncertain, but may be in the relatively near term. Expansion implementation is estimated to take five to ten years. *Therefore, confirmation of the above assumptions is urgently requested to enable the INC to proceed effectively with its task of recommending the appropriate NANP expansion plan.*” [Emphasis added.]

The two assumptions at issue are:

- 1) The INC Uniform Dialing Plan (UDP) will be approved and implemented prior to NANP Expansion; and
- 2) Release of the D-digit¹ will not occur prior to NANP-E.

Both the implementation of the UDP and release of the D-digit involve network and dialing reconfigurations that must be done uniformly across the NANP.

In response to the INC’s request for confirmation of its assumptions, the NANC formed the Assumptions Issue Management Group (IMG) to address the two policy assumptions presented by the INC on NANP expansion (also referred to as “NANP-E”). The IMG is ultimately to prepare a recommendation for NANC approval and forwarding to the FCC.

The IMG limited its considerations to the United States policy implications of the assumptions and did not attempt to consider implications to other NANP nations.

2.0 RELATIONSHIP BETWEEN ASSUMPTIONS AND CURRENT NANP EXPANSION OPTIONS

2.1 PURPOSE OF ASSUMPTIONS

Both of the assumptions listed in Section 1.0 were designed to allow for a transitional dialing period to begin at the time the NANP is expanded. An underlying premise in INC’s expansion planning is that there will need to be a period of permissive dialing during NANP expansion, giving end users an opportunity to dial either the existing or the new, expanded NANP format.

¹ Currently the Numbering Plan Area (NPA, a.k.a. Area Code) consists of digits “A”, “B” & “C”. The first digit of the Central Office Code is the “D” digit.

(This type of permissive dialing period is similar to what is provided today when a new area code or 10-digit dialing is introduced in an area). With NANP expansion, a permissive dialing period will require a “transitional indicator” – a unique digit in the dialing sequence that indicates that the dialed number is in the new, expanded format. The indicator in the expanded format must be a digit that cannot be found in the “old” (i.e., 10-digit) format.

The INC identified three types of transitional indicators that would work with the expansion options:

- 1) The first approach is to use a unique prefix preceding the new expanded format (i.e., “1”). In order for the 1+ prefix to be unique at the time of expansion, the 1+ prefix must be eliminated in dialing prior to NANP expansion. Elimination of the 1+ prefix is an element of the Uniform Dialing Plan (explained in more detail below in Section 3.0), and thus its adoption is included as one of the assumptions.
- 2) The second approach is to use either a 0 or 1 in the D-digit position for numbers dialed in the expanded format during permissive dialing. The D-digit is explained in more detail below in Section 4.0, but in summary, it is the fourth digit in the 10-digit NANP address (i.e., the number immediately after the area code), and in today’s numbering format, this digit cannot be a 0 or a 1. In order for the D-digit to serve as a transitional indicator during NANP expansion, the D-digit cannot be “released” (allowed to be 0 or 1) prior to the expansion. Therefore, not allowing the D-digit release prior to expansion is included as one of the assumptions.
- 3) The third approach is to use the digit ‘9’ in the “B” position of an expanded, 4-digit NPA during permissive dialing. Currently, NPA codes in the format N9X are reserved for NANP expansion, and there are no existing NPAs with a 9 in the second digit position. A ‘9’ as the second digit would indicate a number in the expanded format. This transitional indicator does not require full implementation of the UDP (although it does require elimination of 7-digit dialing at the time of expansion) and is not impacted by opening of the D-digit. Therefore, neither of the assumptions is necessary.

Although the NANP Expansion Workshop is still accepting proposals for the expansion of the NANP, there are 5 expansion options currently under consideration by the INC. Two of the options (2A and 3A) require the use of 1+ as a transitional indicator, and two of the options (1A and 1B) require the use of the D-digit as a transitional indicator. A fifth option (4A) does not require either 1+ or the D-digit as an indicator.

2.2 SUMMARY OF EXPANSION OPTIONS²

OPTION 1-A -- 4 DIGIT NPA WITH NEW D-DIGIT: Option 1A adds a fourth digit to the end of the area code (NPA) field, resulting in an 11-digit number with a 4-digit NPA, but still a 3-digit Central Office Code and 4-digit line number. Option 1-A could potentially be implemented with either 0 or 1 allocated for Canada’s exclusive use as the new fourth digit of

² The INC [Interim NANP Expansion Report](http://www.atis.org) is available at <http://www.atis.org> under INC Documents.

the NPA. During transition, all non-geographic NPAs will be assigned a new fourth digit, either 0 or 1, across the entire NANP area. After transition, the values 2-9 will be assigned for growth. If the digit 0 were assigned to Canada and the digit 1 assigned to the remainder of the NANP during transition, the existing number 202 NXX XXXX³ becomes 2021 XXX XXXX, and 613 NXX XXXX becomes 6130 XXX XXXX. The non-geographic number 800 XXX XXXX becomes 8000 XXX XXXX. N11 codes would stay N11, and 950 XXXX would stay 950 XXXX.

OPTION 1-B -- 4 DIGIT NPA WITH NEW D-DIGIT AND 4 DIGIT C.O. CODES:

Option 1B adds a fourth digit to the end of the area code field and an additional digit to the beginning of the Central Office code field. A twelve-digit number is created with this option with both a 4-digit NPA and a 4-digit Central Office code but still a 4-digit line number. Option 1-B could potentially be implemented with either 0 or 1 allocated for Canada's exclusive use as the new fourth digit of the NPA. During transition, all non-geographic NPAs will be assigned a new fourth digit, either 0 or 1, across the entire NANP area. After transition, the values 2-9 will be assigned for growth. During transition the existing number 202 NXX XXXX becomes 2021 XXXX XXXX, and 613 NXX XXXX becomes 6130 XXXX XXXX. The non-Geographic number 800 XXX XXXX becomes 8000 XXXX XXXX. N11 codes would stay N11, and 950 XXXX would stay 950 XXXX.

OPTION 2-A -- 4 DIGIT NPA WITH NEW A-DIGIT: Option 2-A adds a new digit to the beginning of the area code field, resulting in an 11-digit number with a 4-digit NPA but still a 3-digit Central Office code and 4-digit line number. During the transition period, only the digit 2 will be used as the new A-digit to create four-digit NPA codes. For example, the existing number 202 NXX XXXX becomes 2202 XXX XXXX, and 613 NXX XXXX becomes 2613 XXX XXXX. The non-geographic number 800 NXX XXXX becomes 2800 XXX XXXX. N11 codes would stay N11, and 950 XXXX would stay 950 XXXX.

OPTION 3-A -- NATIONAL DESTINATION CODE (NDC): Option 3A adds a new single digit National Destination Code (NDC) in front of the the current NANP 10-digit address. The NDC field divides the NANP serving area into unique sectors. Calls placed within an individual NDC would be dialed using ten digits (i.e., NPA-XXX-XXXX). Calls placed between NDCs would be dialed using a prefix plus eleven digits (e.g., 1-NDC-NPA-XXX-XXXX). Under this option, the NANP area could be divided into up to eight NDCs. It is currently assumed by INC that one NDC would be assigned to Canada, that the USA would be divided into four NDCs with the remaining NANP countries part of one of the US NDCs, and that all non-geographic codes would be treated as belonging to a sixth NDC. For example, the existing number 202 NXX XXXX becomes 4 202 XXX XXXX, and 613 NXX XXXX becomes 2 613 XXX XXXX. The non-geographic number 800 NXX XXXX becomes 7 800 XXX XXXX. N11 codes would stay N11, and 950 XXXX would stay 950 XXXX.

OPTION 4-A -- 4 DIGIT NPA WITH NEW B-DIGIT: This Option adds an additional digit in the second position of the area code field, creating an 11-digit number with a 4-digit NPA code but still a 3-digit Central Office code and 4-digit line number. In order to distinguish

³ "N" is any digit 2-9 and "X" is any digit 0-9.

between old and new formatted NPA codes and take advantage of the current restricted assignment of N9X formatted NPAs, initially all NPAs (existing and new) would be allocated the digit '9' in the "B" position. For example, the existing number 202 NXX XXXX becomes 2902 XXX XXXX, and 613 NXX XXXX becomes 6913 XXX XXXX. The non-Geographic number 800 NXX XXXX becomes 8900 XXX XXXX. N11 codes would stay N11, and 950 XXXX would stay 950 XXXX.

2.3 NANP-E ALTERNATIVES

The following table shows the 5 expansion options currently under consideration by INC, the expansion indicator required for each, and the impact of using the expanded format indicator.

	NANP-E Alternatives				
Expanded NANP Format	<u>1A</u> NXX(X)- XXX-XXXX	<u>1B</u> NXX(X)- (X)XXX-XXXX	<u>2A</u> (N)XXX- XXX-XXXX	<u>3A</u> N-NXX- XXX- XXXX	<u>4A</u> N(X)XX-XXX- XXXX (80 N9X NPAs held)
Permissive Dialing Pattern for Expanded Format Numbers	NXX (0/1) - XXX-XXXX	NXX(0/1)- XXXX-XXXX	1-NXXX- XXX-XXXX	1-N-NXX- XXX- XXXX	N9XX- XXX-XXXX
Expanded Format Indicator Required For NANP-E Transition	New D-digit of 0 or 1		Prefix 1		New B-digit = 9
Impact of Using the Expanded Format Indicator:					
• Can the D-digit be released prior to NANP-E?	No	No	Yes	Yes	Yes
• Need to eliminate 7-Digit Dialing before NANP-E?	Yes	Yes	Yes	Yes	Yes
• Need to Implement (10-Digit) UDP before NANP-E?	No	No	Yes	Yes	No
• Can the prefix 1+ continue to be used as a toll indicator?	Yes	Yes	No	No	Yes

3.0 INC UNIFORM DIALING PLAN (UDP)

The UDP⁴ eliminates 7-digit dialing and requires 10-digit dialing for all calls, i.e., local and toll Home NPA (HNPA), local and toll Foreign NPA (FNPA). In addition, the 1+, as either a toll indicator or routing digit, would not be used. Toll indication could be given to the caller in another manner, such as a tone indicating that the caller will incur additional charges. However, the industry hasn't yet considered any of the technical, timeframe, or cost impacts of introducing a new type of toll indication.

	HNPA	FNPA
Local	10D	10D
Toll	10D	10D

In addition to acting as a toll indicator, the prefix 1+ is used today to provide a technical function as a "10-digit dialing indicator." Where the prefix 1+ is currently used to indicate that "10-digits follow," the proper routing of calls will no longer depend upon the use of the prefix 1+ since the UDP requires the migration from 7 to a (all) 10-digit dialing plan, hence 7/10-digit dialing conflicts will no longer exist.

The implementation of the UDP is required for certain NANP expansion options (2A and 3A) to "clear all uses of the prefix 1" so that the prefix can be used as a transitional indicator. In addition, although elimination of the 1+ is not required for Option 4A, 10-digit or 11-digit dialing is required.

The INC interim report assumes that the UDP will be implemented "prior" to NANP expansion, but doesn't specify exactly how much time prior to expansion. However, the report recommends that UDP be introduced 5-10 years prior to expansion, in order to allow for a sufficient end user transition period. [Note: the INC assumed in its interim report that UDP will be implemented prior to NANP-E, regardless of the option selected, even though it is not technically required for all options.]

3.1 UDP ASSUMPTION POLICY ISSUES

Adoption of the UDP prior to NANP expansion raises several policy issues:

The first is whether local variations in dialing patterns should be eliminated in favor of a single national standard.

The second policy issue is specific to the UDP's elimination of the 1+ prefix, which serves as a toll indicator in some areas. This raises two sub issues: is a toll indicator still required in an era of sharply declining toll rates and, if a toll indicator is still needed, must it be the dialed 1+ or would some other indication (e.g., a network tone or announcement) be a satisfactory substitute?

⁴ The Uniform Dialing Plan is available at <http://www.atis.org> under INC documents.

The third policy issue has to do with the UDP's elimination of 7-digit dialing. While some regulators are comfortable with the transition to 10-digit dialing of all calls, others are not and State agreement or a Federal mandate to take this step is required.

A fourth issue is the cost of UDP implementation. At a minimum, UDP implementation will require network translation changes and public education and, depending on the disposition of the toll indicator issue, may require more extensive network changes.

A fifth policy issue is the relation of UDP adoption to NANP-E option selection: if the UDP is not adopted prior to NANP-E, certain options that parties might otherwise favor could be eliminated for lack of a viable transition plan.

3.2 UDP ASSUMPTION PROS

1. If a uniform 10-digit dialing plan were adopted for all calls, this would result in easier and uniform customer education, and dialing uniformity, which would especially benefit the traveling public.
2. Customers would know to always dial 10 digits, regardless of the call type. This equates to dialing parity for all subscribers, and in the long term may result in fewer dialing errors in relation to other dialing patterns, which differ in the number of dialed digits for local vs. toll calls.
3. This dialing configuration would accommodate the dialing requirements for NPA overlays, as set forth in the Second Report and Order and affirmed by the Third Report and Order in CC Docket 96-98.
4. Exceptionally simple dialing plan, with minimum user and terminal dialing instruction requirements, which reduces potential for ineffective call attempts.
5. Ongoing NPA growth and relief (e.g. introduction of overlays) will continue to increase amount of 10-digit local dialing required regardless of the need for NANP-E.
6. Mandatory local 10-digit dialing is the next logical step from local 7-digit and local 10D/7D permissive dialing.
7. A mandatory 10-digit dialing plan and elimination of the 1+ prefix are the final steps in the evolution to a uniform dialing plan.
8. Terminals and coin telephones are already configured and compatible for 10-digit local dialing in high density NPAs where overlays or multiple NPAs coexist.
9. Compliant terminals will become very user friendly.
10. Allows reclamation of protected central office codes.
11. Enables certain expansion options (e.g. 2A and 3A) by making the digit "1" available for use as a transitional indicator.

3.3 UDP ASSUMPTION CONS

1. More digits must be remembered and dialed for local calls in those geographic areas where 7-digit dialing still exists. This adjustment may be most difficult for the elderly, some handicapped individuals and young children.
2. There would be no clear dialing distinction between local and toll calls. If toll notification were to be provided, it would have to be implemented outside the dialing plan (e.g. a toll warning tone). Eliminating the dialing distinction between local and toll calls will likely be confusing to consumers. A toll warning tone may not be a sufficient indicator for the hard of hearing.
3. Terminals, which were dependent on 1+ for toll recording and analysis, will need to use other means to establish that a toll call is being made.
4. New network indicators or signaling messages that may be developed for toll indication will require compatible terminal features and modifications.
5. Some coin telephones may require modification depending on the form of toll indicator required. Software controlled coin terminals will require, at minimum, logic modifications and development to work with new toll indicators and messages.
6. States would not be able to retain 7-digit dialing in any area.
7. Alarm companies and other entities that use auto dialers will have to reprogram all equipment that currently dials 7 digits.
8. Advertising needs to be changed to reflect 10 digits, rather than 7 digits.
9. Customer databases that rely on a 7-digit telephone number would have to be changed.

3.4 IMG RECOMMENDATION REGARDING THE UDP ASSUMPTION

The NANC recommends that the FCC inform the INC that it supports the UDP assumption as a means of implementing the designated NANP-E alternatives. Supporting the UDP assumption will impact the way many numbers are dialed across the entire area covered by the NANP. This change will no doubt initially cause inconvenience and result in potential cost to many subscribers, but is necessary to allow for an orderly transition to an expanded NANP, based on the 5 options currently considered by INC. However, the NANP is a 10-digit numbering plan and ultimately it will be necessary to dial 10 digits in order to extract maximum capacity from the numbering plan.

The adoption of a uniform 10-digit dialing scheme will standardize 10-digit dialing throughout the NANP. Everyone is already familiar with dialing in a 10-digit format for at least a portion of the calls they make. All the existing abbreviated dialing schemes, 7 digits, 1+7 digits, etc. have a limited life span. Since many existing rate plans do not differentiate between local or toll calls a standardized dialing scheme would be easily understood and accepted.

Based on this rationale the NANC recommends that the FCC support the adoption of the UDP as the first phase of a transition to an expanded NANP. This NANC recommendation only considered the need to implement UDP as part of a transitional plan for NANP expansion. The NANC is not at this time making any recommendation as to whether mandatory 10-digit dialing or elimination of the 1+ toll indicator should be implemented for purposes other than as a part of NANP expansion, or at any other time prior to the need to transition to an expanded NANP. The industry can allow everyone to get to the ten digit status over a period of 1 to 2 years so that there will be a gradual migration to this state of affairs. This action in itself will make more numbers available and extend the life of the existing 10-digit NANP.

4.0 RELEASE OF THE D-DIGIT

The current NANP format is:

<u>NPA</u>	<u>C.O. Code</u>	<u>Line Number</u>
NXX	NXX	XXXX

Where: “N” is any digit 2-9 and “X” is any digit 0-9.

The NPA consist of digits “A”, “B” & “C”. The first digit of the C.O. Code is the “D” digit.

Release of the D-digit removes the current restriction on the fourth digit in the numbering sequence (i.e., the digit following the area code) so the digit could be a “0” or a “1”. Thus, NXXs in the form 021, 076, 154, 190, etc., could be assigned. Release of the D-digit by itself, (i.e., not combined with any other NANP expansion option) theoretically provides a 25% increase in the current NANP. However, because current internal network uses of the D-digit would have to be cleared and reassigned to other NANP resources, the actual net increase in the current NANP from D-digit release would be less than 25%.

Release of the D-digit must be done on a simultaneous, uniform basis throughout the NANP. It therefore requires close coordination and participation by regulators, providers and end users in all states and NANP countries.

Releasing the D-digit will require clearing all uses of the 0 and 1 in the D-digit position (e.g., to support internal routing, identification and billing functions, etc.) It is recognized that the current use of 0 or 1 in the D-digit position is extensive and therefore steps must be taken to identify and eliminate all such uses prior to any release of the D-digit.

In order for the D-digit to be used as a transitional indicator for options 1A and 1B, it cannot be released prior to NANP expansion, but it must be released as part of the NANP expansion. Under the other options (2A, 3A and 4A), the INC assumed that the D-digit would be released no later than the end of permissive dialing for NANP-E so as to provide more central office codes in each NPA. However, release of the D-digit under those options is not ever technically required.

D-digit release requires 10-digit dialing. Therefore, it results in the elimination of 7-digit dialing, even if release takes place prior to NANP-E, since 7-digit dialing with a D-digit of 0/1 is

not possible considering the current uses of a leading 0/1. Any decision to release the D-digit will require a comprehensive analysis addressing the feasibility of releasing the D-digit, including the potential impact upon existing uses for Telephone Numbers (TNs) where the D-digit is a 0 or 1 today (e.g. calling cards).

4.1 D-DIGIT ASSUMPTION POLICY ISSUES

The primary policy issue surrounding the assumption to not release the D-digit prior to NANP expansion is whether or not the possibility of gaining access to additional numbers, by releasing the D-digit prior to NANP expansion, should be eliminated in order to keep the D-digit available as a transitional indicator for eventual NANP expansion.

Related to this issue, however, is the question of whether release of the D-digit is a desirable short-term method of gaining access to additional NANP resources. The industry presently has put the D-digit to multiple uses in many internal applications and network functions: it may be very difficult to release the D-digit in the short term. Therefore, short-term release of the D-digit may not be possible or as important as providing a method to transition to the expanded NANP.

4.2 D-DIGIT ASSUMPTION PROS

The following is a list of benefits that may be derived from delaying the D-digit release until implementation of NANP Expansion.

1. Allows for an unambiguous method to transition from the existing NANP to all expanded NANP plans that do not release the D-digit prior to expansion.
2. Enables extended use of the D-digit for test codes; billing for INWATS, OUTWATS & PBX/Centrex; prefixes for OUTWATS; pseudo numbers for ACD; Caribbean USA direct dialing, international inbound 800, and some OSPS services; and ESRD/ESRK E.911 routing numbers.
3. It will be very difficult if not impossible to release the D-digit prior to NANP Expansion given the large number of uses that are presently associated with the D-digit. Forcing this change in the short term may be an imposition on the industry and consumers.
4. Earlier release of the D-digit (i.e. prior to NANP expansion) as a short term method of gaining access to additional NANP resources may unnecessarily burden the industry and consumers with two separate and costly efforts. The benefits, costs, and efforts to release the D-digit prior to NANP expansion may not be significant enough to justify such an effort in the short term given the limited quantity of numbers obtained.
5. Deferral of the D-digit release allows 7-digit dialing to remain in place longer.
6. Release of the D-digit may cause service providers to request additional NANP resources to serve some of the needs currently provided by 0/1XX Central Office codes, reducing the benefit obtained. Note that, while the 0/1XX codes can be shared (the same numbers used

internally by different providers), replacement resources from the general NANP would not be shared so that each service provider would have to obtain separate resources.

7. D-digit release may lead to human factors issues (e.g. dialing errors where UDP has not been implemented) given that the central office field can begin with a 0 or 1.

4.3 D-DIGIT ASSUMPTION CONS

The potential detrimental impact of delaying D-digit release until NANP expansion is that it eliminates the possibility of gaining access to additional NANP resources (up to 25%), which in turn would delay the exhaust of the 10-digit NANP.

4.4 IMG RECOMMENDATION REGARDING D-DIGIT ASSUMPTION

The NANC recommends that the FCC inform the INC that its assumption, that the D digit will not be released prior to NANP Expansion, should be retained. This recommendation is made on the following grounds:

- Release of the D-digit requires changes in customer dialing patterns that at least some regulators find undesirable and wish to defer as long as possible. It is not clear whether the necessary NANP wide consensus to release the D-digit can be established prior to NANP-E.
- Release of the D-digit requires clearing of the present uses of the D digit. This will require considerable expense and potential service disruption. These can best be minimized if carried out as part of NANP expansion, even if as an initial phase that occurs immediately prior to the start of transition to the expanded NANP itself.

5.0 CONCLUSION

If the FCC agrees with the support of the two assumptions, the INC must be so informed by the FCC if the INC is to effectively and timely complete its work on recommending an expanded format for the NANP. Also, the assumptions need to be discussed by and accepted by all NANP countries.

APPENDIX 1

**DIALING CONVENTIONS
AND
TOLL INDICATOR (1+ DIALING) IN THE 50 STATES**

This table was prepared for the North American Numbering Council's Assumptions Issue Management Group. It is included for discussion purposes only.

The table below depicts state dialing rules for Home NPA Local Calls, Foreign NPA Local Calls, Home NPA Toll Calls, and Foreign NPA Toll Calls. Please note that 1+10 digits does *not* necessarily reflect toll treatment for a given call. There are jurisdictions where local calls to Foreign NPAs require 1+10 digits. (See "FNPA LOCAL" below.) The total number of States with "1+ equal toll" is 34, and the total number of States with "1+ does not equal toll" is 17.

The current dialing schema for the 50 states follows.

STATE	HNPA LOCAL	FNPA LOCAL	HNPA TOLL	FNPA TOLL	"1+" = TOLL
ALABAMA	7D	7D	1+10D	1+10D	YES
ALASKA	7D	1+10D	1+10D	1+10D	NO
ARIZONA	7D	7D for 520 NPA; 10D All Other NPAs	1+10D	1+10D	YES
ARKANSAS	7D	7D	1+10D	1+10D	YES
CALIFORNIA	7D	1+10D	1+10D	1+10D	NO
COLORADO	7D; 10D for 303, 720	7D for 970; 10D for All Other NPAs	1+10D	1+10D	YES
CONNECTICUT	7D	1+10D	1+10D	1+10D	YES
DELAWARE	7D	10D	1+10D	1+10D	YES
DISTRICT OF COLUMBIA	7D	10D	NA	1+10D	YES
FLORIDA	7D for 321 NPA in Brevard, 352,561, 727. 10D All Other NPAs	10D	1+10D	1+10D	YES
GEORGIA	7D; 10D for 404,678 and 770 NPAs	10D	1+10D	1+10D	YES
HAWAII	7D	NA	1+10D	1+10D	YES
IDAHO	7D	7D	1+10D	1+10D	YES
ILLINOIS	7D; 10D for 224,331,464 NPAs	1+10D	1+10D	1+10D	NO
INDIANA	7D	7D	1+10D	1+10D	YES
IOWA	7D	7D; 10D for 515 NPA	1+10D	1+10D	YES
KANSAS	7D	7D	1+10D	1+10D	YES
KENTUCKY	7D	7D	1+10D	1+10D	YES
LOUISIANA	7D	1+10D	1+10D	1+10D	NO
MAINE	7D	1+10D	1+10D	1+10D	NO
MARYLAND	10D	10D	1+10D	1+10D	YES
MASSACHUSETTS	7D	10D	1+10D	1+10D	YES
MICHIGAN	7D; 1+10D for 278,679, 947 NPAs	1+10D	1+10D	1+10D	NO
MINNESOTA	7D	7D; 10D for 612,651, 763, 952 NPAs	1+10D	1+10D	YES
MISSISSIPPI	7D	7D	1+10D	1+10D	YES
MISSOURI	7D	1+10D	1+10D	1+10D	YES

STATE	HNPA LOCAL	FNPA LOCAL	HNPA TOLL	FNPA TOLL	“1+” = TOLL
MONTANA	7D	7D	1+10D	1+10D	YES
NEBRASKA	7D	7D	1+10D	1+10D	YES
NEVADA	7D	1+10D	1+10D	1+10D	NO
NEW HAMPSHIRE	7D	1+10D	7D	1+10D	NO
NEW JERSEY	7D	1+10D	7D	1+10D	NO
NEW MEXICO	7D	7D	1+10D	1+10D	YES
NEW YORK	7D	1+10D	7D	1+10D	NO
NORTH CAROLINA	7D;10D for 704, 980 NPAs	10D for 704, 980 NPAs; 1+10D All Others	1+10D	1+10D	YES
NORTH DAKOTA	7D	7D	1+10D	1+10D	YES
OHIO	7D	1+10D	1+10D	1+10D	NO
OKLAHOMA	7D	7D	1+10D	1+10D	YES
OREGON	7D	7D Non-Overlay areas; 10D Overlay areas of 503, 971 NPAs	1+10D	1+10D	YES
PENNSYLVANIA	7D for 412,570,717,724,814 NPAs; 10D All Others	10D	7D for 412, 570, 717, 724, 814 10D All Others	1+10D	NO
RHODE ISLAND	7D	1+10D	7D	1+10D	NO
SOUTH CAROLINA	7D	1+10D	1+10D	1+10D	NO
SOUTH DAKOTA	7D	7D	1+10D	1+10D	YES
TENNESSEE	7D	7D	1+10D	1+10D	YES
TEXAS	7D All Others; 10D for 214, 281,713, 832,972	10D	1+10D	1+10D	YES
UTAH	7D	7D for 435 NPA; 10D for 801 NPA	1+10D	1+10D	YES
VERMONT	7D	1+10D	1+10D	1+10D	NO
VIRGINIA	7D for 540, 757, 804; 10D All Others	10D	1+10D	1+10D	YES
WASHINGTON	10D for 360 NPA; 7D All Others	7D for 509 NPA; 10D All Others	1+10D	1+10D	YES
WEST VIRGINIA	7D	1+10D	1+10D	1+10D	NO
WISCONSIN	7D	1+10D	1+10D	1+10D	NO
WYOMING	7D	7D	1+10D	1+10D	YES