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April 15, 2016

Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA17105-3265

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SECRETARY'S BUREAU

Re: 717 Area Code Reliefs, Docket No. P-2015-2510230

Dear PUC Secretary:

I urge the Public Utility Commission (PUC) to order the Alternative#1 – All Services Distributed Overlay to relieve the 717 Numbering Plan Area (NPA) exhaust forecast for the 3Q2018 and not the Alternative#2 – NPA Split. Splitting the existing 717 NPA geographic area would create havoc with the affected people notifying all of their changed number, impede business which could lead to lost jobs, induce unnecessary costs to the residents of Pennsylvania, and place the telephone network in jeopardy during the conversion period. All of this would occur just to retain seven digits dialing which will most probably be superseded in the near future as ten digits dialing is very rapidly being accepted as the standard practice nationally. Almost everybody today does not dial numbers as they use their telephone directories with all numbers loaded are in the 10-Digit format. The Federal Communications Commission (FCC) may very likely mandate ten digits dialing any time as they mandated seven digits dialing in the late 1940's or early 1950's. With the portability of modern cell phones in recent years, the public is rapidly accepting ten digit dialing.

So deployment of a split just to retain 7 digit dialing would be of no avail.

If the 717 was split, telephone customers in the region getting the new NPA must notify all who have their numbers of the area code change. Just identifying the people,

businesses, and data bases that have or contains your number will be virtually impossible. It is pretty much a given that the southern split subscribers, where I live, will be the losers and get the new area code. It would be very unlikely the PUC would assign the new code to the upper half where the Harrisburg State Government resides.

A resident missing notification to somebody that calls them every couple years is no big deal, but this could be disastrous to a business. Let me site you an example very close to home. After the old 717 NPA was split with a new 570 NPA in December, 1998 and the old 717 numbers were released to be reassigned in the new 570 area, a relative of mine obtained a new cell phone in Chambersburg. The number issued to her new cell phone was the old number of a large lumber business in the 717 region that was split into the 570. She started getting calls for that company shortly thereafter. Some calls are customers and some are delivery trucks wanting to know what dock to back into. These calls finally ceased around years 2008 or 2009. You may ask why my relative didn't request a number change. She was in the retail business and had already given her number out to vendors and customers and did not want to chance losing their contact. The real loser is the business in the 570 who doesn't even know he was losing calls that could be sales.

I will give you another example. A person residing outside the existing 717 NPA does business today with a business in the current 717 area. Five years after the split this person wants to repeat business and he/she pushes the button for the stored number of that business or looks at their number on an old invoice. They get somebody different or a recording. They think the business is out of business? They could go to the internet and try and find them, but why bother if they know of a comparable vendor. Of course the business could look up all customers in their data base and notify them of the number change even if you only bought a \$50 item ten years ago. But let's be real, nobody has time or money to do that.

The potential for lost business revenue and resultant lost jobs would be avoided if an overlay was ordered instead of a split.

The split of 717/570 in 1998 was justified as the Competitive Local Exchange Carriers (CLEC) were just rolling out their networks and the new numbers would have

been assigned to the new carriers making the playing field uneven. This justification no longer exists.

The proposed split separates communities of interest. An example is that Shippensburg and Chambersburg would be in separate Areas.

Deploying a split does reduce the size of the area served by a given area code. This should not be an issue as the 717 and 570/272 are pretty much the same size.

Historically prior to year 2000 when splits were commonplace, call routing and translations were mainly contained within the switch giving full control of the flash number change to the telco owner. Due to technology evolution, routing and switching is dependent on many other data bases that contain the telephone number. Some examples are Local Number Portability (NPAC), Caller ID, Voice Mail, and Emergency Services just to name a few and all will be involved with the number change. Some of these data bases are owned by other companies providing service to the telco. Also, due to competition, many CLECs and wireless carriers reside in the base rate area requiring coordination of the number change.

A split requires a more complex network that increases the possibility of jeopardizing the operation of the network during the split number change process. I can assume this is what degraded the New Mexico network for two weeks in 2007 caused by the implementation of a split. Per the Telecom Routing Administrations¹ (TRA): "No NPA splits have been scheduled since the last occurred in 2008. NPA relief activity is now addressed via overlays."

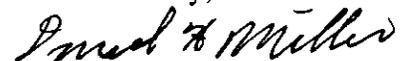
The cost to the Telephone Operating Companies in the 717 area will be astronomical if a split is ordered and these costs will be passed thru to the Pennsylvania Residents in some way. The implementation of overlay has virtually little cost as the only action required is assigning new numbers. We Pennsylvania Residents do not need any more expense in the down economic environment, especially when a more viable option is less expense.

¹ Telecom Routing Administration is an organization within ICONECTIV.

I (Daniel Miller) am a Retired Network Planner from a Local Telephone Company. Prior to my retirement, I was assigned to the team within my company to obtain relief of the 717 NPA (Area Code or Numbering Plan Area) that resulted in the 570/717 split in the 226 Capital LATA (Local Access Transport Area), implemented in April 1999. I was also assigned the task to represent my company on the Mid-Atlantic Local Number Portability (LNP) Team to recommend procedures for permanent LNP, write the Request for Quote for the Number Portability Administrator Center (NPAC) Equipment, and recommend the selection of the vendor to the Commissions in the mid to late nineties. I am submitting these comments as a concerned citizen that is familiar with the subject and I am not affiliated with any Telecommunications Company or Organization in any way.

In closing, I strongly urge you to order an Overlay and not a Split to relieve number exhaust in the 717 NPA. Feel free to contact me with any questions or concerns at 717-264-3898 or EMAIL scottree@comcast.net.

Sincerely,



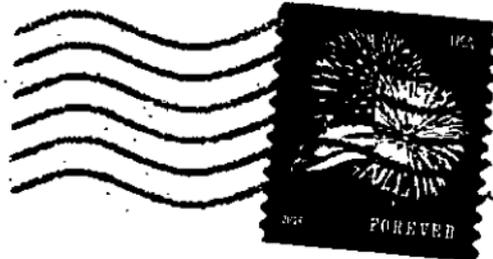
Daniel H. Miller

cc: Robert Thomas, Franklin County Commissioner
Sam Cressler, Supervisor, Southampton Township
Rob Kauffman, Representative
Rich Alloway, Senator
Jim Hook, Public Opinion Newspaper Reporter

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