



COMMONWEALTH OF PENNSYLVANIA

May 5, 2016

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition for Approval of Numbering Plan Area Relief
Planning for the 717 Numbering Plan Area
Docket No. P-2015-2510230**

Dear Secretary Chiavetta:

I am delivering for filing the Comments of the Office of Small Business Advocate on the Petition for Approval of Numbering Plan Area Relief Planning for the 717 NPA. Copies are being served as indicated on the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Enclosure

cc: Tanya J. McCloskey, Acting Consumer Advocate
Wayne Milby and Beth Sprague, NeuStar, Inc.
Kimberly Wheeler Miller, Esquire – NeuStar, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Approval of Numbering Plan : Docket No. P-2015-2510230
Area Relief Planning for the 717 NPA :

**COMMENTS OF THE OFFICE OF SMALL BUSINESS ADVOCATE
ON THE PETITION FOR APPROVAL OF NUMBERING
PLAN AREA RELIEF PLANNING FOR THE 717 NPA**

I. INTRODUCTION

On October 23, 2015, the North American Numbering Plan Administrator (“NANPA”), NeuStar, Inc., in its role as the neutral third party NPA Relief Planner for Pennsylvania, acting on behalf of the Pennsylvania telecommunications industry (“Industry”) filed a Petition with the Pennsylvania Public Utility Commission (“Commission”) requesting approval of its plan to alleviate numbering exhaust for the 717 Numbering Plan Area (“NPA” or “area code”).

The Petition indicated that the Industry reached a consensus plan to implement an all services distributed overlay for the geographic area covered by the 717 NPA, which would create a new area code to service the area (the “Plan”).

The Commission issued an Order on March 10, 2016, that does not implement the Plan, but instead seeks input from consumers, the Industry and other interested parties through testimony at public input hearings. In addition, the Order seeks written comments within 45 days of publication of the Order in the Pennsylvania Bulletin, which occurred on March 26, 2016. The Office of Small Business Advocate (“OSBA”) submits the following comments pursuant to the Order.

II. COMMENTS

The OSBA supports the Plan to introduce a new overlay area code that would incorporate the existing boundaries of the 717 area code (Alternative #1). We believe that this alternative will be simpler for small businesses – and, importantly, their customers – to understand than would be a geographic split.

First, adding an overlay area code will enable all existing customers to retain existing phone numbers. This is a critical benefit for small business customers, many of whom have spent years (if not decades) creating local awareness of their presence, including their telephone numbers. Alternative #2 (a geographic split) would require at least some small businesses to inform customers that their area code has changed. The Commission noted the unique inconveniences to the small business community in its Order at page 9:

Customers in the area retaining the old area code are minimally impacted. Customers in the new area code, however, must change their area codes. Businesses must revise their stationery and their advertising. Commercial customers may not be able to retain "vanity numbers," upon which they have spent advertising dollars.

Second, end-user customers are not intuitively aware of area code boundaries. Understanding, such as it is, is built through experience. An overlay process avoids this confusion.

Third, the use of area codes is becoming less geographically important, as many (residential) users migrate to wireless services with phone numbers that mean little more than where the customer lived when they first obtained a mobile phone. Introducing an overlay scheme for new numbers is more consistent with this trend than a geographic split.

III. CONCLUSION

In view of the foregoing, the OSBA respectfully requests that the Commission adopt the proposed Industry Plan (Alternative #1) to address number exhaust within the 717 area code.

Respectfully submitted,



Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Dated: May 5, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Approval of Numbering Plan : Docket No. P-2015-2510230
Area Relief Planning for the 717 NPA :

CERTIFICATE OF SERVICE

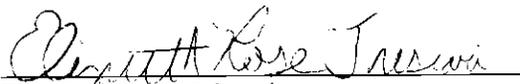
I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements set forth in the Commission's Order dated March 10, 2016, in the above matter:

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DATE: May 5, 2016


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