



Michelle Painter
Counsel

12502 Sunrise Valley Drive
Reston, VA 20196
O: 571-287-8097
michelle.painter@sprint.com

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Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

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

Dear Secretary Chiavetta,

Please find enclosed for filing Joint Industry Comments filed on behalf of the following members of the industry: Verizon Pennsylvania LLC, Verizon North LLC, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and Cellco Partnership d/b/a Verizon Wireless; AT&T Corp. and Teleport Communications America, LLC; T-Mobile Northeast LLC, T-Mobile Central LLC and VoiceStream of Pittsburgh, L.P.; Sprint Communications Company L.P. and Sprint Spectrum L.P.; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; and Windstream D&E, Inc., Windstream D&E Systems, LLC & US LEC Pennsylvania, LLC. Please feel free to contact me if the Commission has any questions regarding this matter.

Respectfully submitted,


Michelle Painter

Enclosure

cc: Office of Consumer Advocate and Neustar (via e-mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

JOINT INDUSTRY COMMENTS

Consistent with its position in recent area code proceedings, the industry strongly supports the Commission's adoption of an all-services overlay for relief of the exhausting 717 Numbering Plan Area ("NPA") in Pennsylvania and a thirteen month implementation period.¹

Now, as in past area code relief decisions, the Commission should choose the option that offers the most advantages and fewest disadvantages for residential and business customers in the affected areas. For the reasons set forth below, an all-services overlay for the 717 NPA will provide far more advantages and far fewer disadvantages than a geographic split of the NPA, and accordingly should be the relief method approved in this area code. As 10-digit dialing has become nearly ubiquitous with wireless and other new technologies, previous arguments in favor of area code splits have become less relevant. Indeed, no commission has implemented a split in nearly a decade. Instead, the overlay has been the overwhelming method of relief chosen, with dozens of overlays implemented over the past ten years including this Commission's adoption of an overlay for the 570 area code in 2010. The relief for 717 should be the same.

¹ These comments are submitted by the following members of the industry: Verizon Pennsylvania LLC, Verizon North LLC, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and Cellco Partnership d/b/a Verizon Wireless (collectively, "Verizon"); AT&T Corp. and Teleport Communications America, LLC (collectively, "AT&T"); T-Mobile Northeast LLC, T-Mobile Central LLC and VoiceStream of Pittsburgh, L.P. (collectively, "T-Mobile"); Sprint Communications Company L.P. and Sprint Spectrum L.P. (collectively "Sprint"); The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink ("CenturyLink"); and Windstream D&E, Inc., Windstream D&E Systems, LLC & US LEC Pennsylvania, LLC (collectively "Windstream"); (collectively, "Joint Carriers").

I. THIS COMMISSION AND OTHERS HAVE RECOGNIZED THAT AN OVERLAY IS THE PREFERRED SOLUTION IN TODAY'S ENVIROMENT.

In 2010, when faced with the need to provide relief for the 570 area code, this Commission considered significant industry and public input and determined that an overlay was the best solution. As the Commission explained:

The Commission prefers to implement the form of area code relief that is the least disruptive to the residential customers and businesses that reside within the 570 area code. The Commission notes that the industry reached a consensus to implement an all-services distributed overlay for the geographic area covered by the 570 NPA, which would create a new area code to service the area and require ten-digit dialing to complete all calls. Additionally, upon our review of the written comments received and the transcript from the various public input hearings, many agree with the industry's consensus recommendation to implement an all-services distributed overlay for the geographic area covered by the 570 NPA.

We agree with the industry's recommendation and the sentiments of the majority of the commenters. We believe that the geographic size of the 570 area code lends itself to the imposition of an overlay. On the other hand, implementing a geographic split would create smaller and smaller geographic sections that result in arbitrary regions that make no geographic sense at all. A geographic split can divide communities of interest, such as neighborhoods, school districts and municipalities. Thus, the area code loses its meaning because there are too many areas and too many codes.

Furthermore, we believe that the imposition of an overlay would be the least disruptive to the customers and, more importantly, the businesses that reside within the 570 area code. With a geographic split, individuals and businesses in the area that changes or receives the new area code would have to re-print stationery and signs, write letters and send e-mails announcing the change of their phone number, or risk having their incoming calls misdirected. Additionally, the persons who call the affected numbers typically have to call twice and then update their paper and computer records. For these reasons, we will direct Neustar to implement an all-service distributed overlay for the 570 area code.²

Other state commissions that have faced the need for area code relief in recent years have reached the same conclusion as this Commission. Over the past ten years, telecommunications carriers across the NANP region have completed 49 NPA overlay implementations (32 in the

² *Petition of the North American Numbering Plan Administrator on behalf of the Pennsylvania Telecommunications Industry for Approval of Numbering Plan Area Relief Planning for the 570 NPA*. P-2009-2117193 (Opinion and Order entered July 19, 2010) at 7-8.

United States, 16 in Canada and one in the Dominican Republic) and seven additional NPA overlay projects (six in the United States and one in Canada) are scheduled to be completed in 2016 and 2017. Extensive industry experience with implementation of these area code overlays has demonstrated that both carriers and customers readily adapt to overlays. Past concerns that an overlay area code and 10-digit dialing would confuse customers have not materialized in jurisdictions where overlays have been successfully implemented, including here in Pennsylvania where overlays have successfully been implemented for the NPAs 570/272, 215/267, 610/484 and the NPA 878 overlay of 412/724. In fact, all areas in Pennsylvania have already adopted 10-digit dialing except 717 and 814.

Recently several states have *reversed* initial decisions to implement geographic splits. In Utah, the Public Service Commission adopted a split in 2000 to address number exhaust in the 801 area code. Implementation of the split was postponed until 2008 because of the employment of number conservation measures. In July 2007, however, the Utah Commission rescinded its 2000 order and ordered the use of an area code overlay instead. In support of its decision, the Utah Commission stated:

Over the seven years since our prior decision, there have also been additional changes relative to the experience with and abilities to implement area code overlays versus area code splits. Other jurisdictions and the industry now have prepared for or implemented seventy area code overlays; a record of experience much more substantial than when we faced this matter in 1999 and 2000. This experience has shown that difficulties with widespread customer confusion with an area code overlay did not materialize as feared. Indeed, *this experience has shown that an area code overlay is more successfully implemented with less inconvenience to consumers and businesses than an area code split.*³

³ *In the Matter of the Petition for (801) Area Code Overlay & Abrogation and Recision of 801 Area Code Split Order*, Docket No. 07-999-01 (Utah PSC Order Entered July 12, 2007) at 7, <http://www.psc.utah.gov/utilities/misc/07orders/Jul/0799901osacoaraosacs.pdf>.

In February 2008, the West Virginia Public Service Commission reversed a prior decision to implement a geographic split and instead ordered implementation of an overlay.

The West Virginia Commission found that it was:

persuaded by two key themes that were repeated in the requests to reconsider the Order: (i) the geographic split would have imposed a disproportionate economic burden on that portion of the state being required to switch to the new area code and (ii) those individuals and businesses familiar with the ten-digit dialing requirements imposed by other overlay plans in adjoining or other states indicated that the current technology and programming of phones and cellular phones alleviated most of the problems that formerly existed with ten-digit dialing and that ten-digit dialing becomes second nature within a short period of time.⁴

The California Public Utility Commission initially ordered a geographic split to relieve the exhausting 760 area code on April 2, 2008, but then based in part on public opposition to the split it reversed that decision and ordered an overlay on October 16, 2008. The California Commission reasoned that:

The overarching theme was that changing their area code would impose substantial costs on businesses for advertising, documents, products as well as lost customers when they are unable to reach the business, and that residential customers would suffer lost contacts from friends and family when the 760 area code would no longer be effective for their telephone numbers. (Pg 2, ¶ 2)

The extensive public response to our decision focused on the inconvenience and expense of changing telephone numbers, as compared to the relatively minor burden of 10-digit dialing. Customers explained in great detail the expenses that will be incurred by businesses, the lost contacts for individuals, and the use of “speed dial” features on modern telephones that can offset the impact of 10-digit dialing. (Pg 4, ¶1).⁵

⁴ *The North American Numbering Plan Administrator, on behalf of the West Virginia Telecommunications Industry Petition for approval of a relief plan for the 304 Numbering Plan Area*, Case No. 00-0953-T-PC, (West Virginia PSC Order issued February 13, 2008, at 2, (“West Virginia Decision”), <http://www.psc.state.wv.us/scripts/WebDocket/ViewDocument.cfm?CaseActivityID=233002>.

⁵ *Application of the North American Numbering Plan Administrator, on behalf of the California Telecommunications Industry for Relief of the 760 Numbering Plan Area*, CA PUC Decision 08-10-038, October 16, 2008 at 4, http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/92465.doc.

This Commission should continue the progressive area code relief leadership it first displayed more than a decade ago in ordering two of the first overlays in the country in 1998 (267 on 215 and 484 on 610) by recognizing, as many other states subsequently have, that the significant costs and inconvenience of telephone number changes, as well as the divisiveness inherent in a geographic split, can and should be avoided by choosing instead the far more benign overlay form of relief.

II. AN OVERLAY OF THE 717 NPA WILL PROVIDE THE MOST CUSTOMER-FRIENDLY, LEAST DISRUPTIVE AND MOST EFFICIENT FORM OF AREA CODE RELIEF.

A. An Overlay Will Not Require Any Customers to Change Telephone Numbers.

The biggest advantage of an overlay of the 717 NPA is that existing residential and business customers will not need to incur the unnecessary costs and inconvenience associated with changing their telephone numbers — for both landline and wireless service. By contrast, if a geographic split of this NPA were implemented, approximately one-half of the currently assigned telephone numbers in the NPA would have to change to the new, post-split area code.

The expense and inconvenience of unnecessary number changes are significant. A geographic split would require business customers in the new NPA to change stationery, signage, and listings in yellow pages and other advertising media such as brochures and catalogs, websites, and social media pages. This would be particularly important for the many small businesses, independent contractors, and agents that do not maintain regular contact with their customers who may be at distant locations and unaware of local area code changes or who may conduct business on an *ad hoc* or seasonal basis. For the same reasons, businesses that rely heavily on referrals for new customers also would be adversely affected by a geographic split. An overlay will protect these businesses from the needless financial risk of losing potential sales simply because past and prospective customers are unable to contact them due to telephone number changes.

For residential customers in the 717 NPA, an overlay will eliminate any need for them to notify friends, relatives, schools, doctors, dentists, banks, insurance agents and anyone else who might need to contact those customers. By contrast, if a geographic split were to occur, all residential customers on the “losing” side of the split would be forced to make all of these notifications. In some cases, a change in phone number can result in unanticipated impacts on emergency, medical, and insurance programs that are tied to customers’ phone numbers. An overlay achieves the same goals of maintaining adequate numbering inventory and avoids any negative impacts to existing customers because all customers retain their current phone numbers.

Basic fairness also supports the adoption of an overlay for the 717 NPA. An overlay will treat all customers equally — there is no “wrong side” of an overlay. An area code split, by contrast, would necessarily provide “preferential” treatment to those customers who retain the 717 area code, while disadvantaging those customers who are forced to change their telephone numbers. Although all customers will have to adjust to changes in dialing patterns for making local calls as the result of an overlay, this relatively minor inconvenience will be borne equally by all customers.

Indeed, in neighboring West Virginia, the Public Service Commission recognized that an “overlay avoids an unfair distribution of the cost and inconvenience of implementing area code relief only on those customers who would receive a new area code under the geographic split.”⁶ The perception of “winners and losers” among existing customers is important, as about half of the customers would be forced to change to a new telephone number if a split were adopted. This perception would likely be particularly acute among 717 NPA customers required to change to a new area code since these customers escaped being on the “losing side” of a split when the previously exhausting 717 area code was split to create the new 570 area code in 1999, and having

⁶ West Virginia Decision, at 2.

had an attachment to their 717 number for another sixteen years, they do not want to be on the “losing side” of a new split now.

Telecommunications technology has transformed the way customers communicate, which in turn has brought about changes in customer needs and priorities. With the significant growth in wireless subscription and usage, many customers now find their wireless phones to be “essential” both for work and to manage their personal lives and stay connected with friends and family. Indeed the Centers for Disease Control (CDC) found that as of mid-2015 nearly half (47.4%) of United States households relied solely on wireless phones and had no home landline, while an additional 14.6% of households have landlines but receive all or almost all calls on wireless telephones.⁷ Customers thus increasingly identify wireless telephone numbers with the person they are trying to reach, wherever that person might be, and generally with that person for life. It is more important than ever for wireless customers to keep their telephone numbers and not be forced to change numbers as a split of the 717 NPA would require.⁸

In addition to avoiding undesirable number changes, an overlay of the 717 NPA also will eliminate the inconvenience imposed on wireless customers to reprogram their cell phones to make those number changes. While most digital wireless phones now have the capability for “over the air” programming, a customer who is an infrequent user or is out of the country may miss the reprogramming transmissions needed to implement a geographic split, resulting in service interruptions and/or an inconvenient trip to the wireless service provider’s retail store to have the phone reprogrammed. The latter trip would also be required for any customers who still use older

⁷ Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January–June 2015. <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201512.pdf>

⁸ This is especially true because wireless telephone numbers are typically not made public in any telephone number directories or directory assistance services. Accordingly, a wireless customer whose number changes in a split could be unreachable by any caller who attempts to call the customer’s “old” number after any recorded line announcements of the area code change are discontinued.

phones that cannot be reprogrammed “over the air.” During a split, if such phones are not reprogrammed by the end of the permissive dialing period, calls will not complete to those phones after the start of mandatory dialing of the new area code until reprogrammed.

B. An Overlay Is Much Less Difficult for the Joint Carriers and Others to Implement, Thereby Minimizing the Risk of Customer Disruption.

Generally, carriers can make the necessary changes in their networks to implement an overlay like that proposed for the 717 NPA more easily than for a geographic split, because the implementation tasks will be far less numerous and complicated for an overlay. It is simply less difficult to make the network modifications necessary to accommodate the dialing changes required for a new overlay area code than it is to: 1) handle the complex switch translations and myriad operating support system programming work needed to cleave an area code in two; 2) permit both the old and new area codes to be successfully dialed for several months; and then 3) proceed to mandatory “new” area code dialing with a few months of recorded announcements to customers who dial the “old” area code number in error.

As explained earlier, geographic splits are no longer common, and one reason for that is that it is more technically difficult for carriers to comply with critically important Local Number Portability (“LNP”) requirements when an area code splits. The Number Portability Administration Center (“NPAC”) houses all of the ported and pooled number data. With a geographic split, during the night on which permissive dialing is initiated, NPAC personnel must update the database to include both the old and the new area codes, and all carriers in the area code must likewise update their operating support systems with the new and old area codes for the split and do other work to coincide with the NPAC so that number port requests will complete within the required time frames. Port requests can fail or create a backlog if the carriers’ systems are not in sync with the

NPAC. Where such coordination fails, calls can be misrouted or denied. With so many moving parts, the potential for a wide variety of errors is great, despite preparation and advance planning.⁹

The industry's most recent experience with a geographic split was almost ten years ago in New Mexico. There, notwithstanding the formation of a technical committee composed of industry representatives and regulatory officials, extensive preparations, and an extended implementation period, problems ensued when permissive dialing began in October 2007. There were problems with implementation of the necessary software and hardware changes in various exchanges and PBXs to accommodate the geographic split at the start of permissive dialing.¹⁰ Additional technical glitches included continuous routing errors, calls not being properly delivered to the new area code when dialed, failures to effectuate orders for wireless number portability, and inadvertent wireless roaming charges.¹¹ Beyond foreseeable problems, unforeseeable glitches arose in New Mexico because of the sheer complexity of interdependent and multiple advanced platforms. As technologies continue to evolve and networks become increasingly more complex, the New Mexico experience vividly demonstrates that geographic splits have a far greater potential than overlays to cause unnecessary customer disruption and complaints.

⁹ Ironically, it was the unavailability of number porting in the mid- to late 1990's that led to an early preference for geographic splits in Pennsylvania and elsewhere, because some competitive local exchange carriers did not want to be assigned numbers in a new unfamiliar overlay area code while incumbent carriers retained most of the old area code numbers. The advent of porting largely eliminated this concern and made overlays more attractive. Now the technical difficulties associated with splits in a number porting environment are yet another reason why geographic splits are technically disadvantageous and unnecessary in the modern era.

¹⁰ Because overlays have been by far the predominant form of area code relief since 2000, some equipment and software suppliers to carriers for emerging technologies have not developed support for geographic split implementations. A split may thus require difficult technical workarounds by carriers to deal with the lack of split support from vendors.

¹¹ Another split-related technical problem is that during the permissive dialing period, the called party's Caller ID device or handset might indicate that he received a call from a number with the new area code even though the person initiating the call was still using his current area code number (or vice versa). Although this issue does not technically affect the ability of the call to complete, it could lead to confusion on the called party's part. The called party might choose not to answer the call because he did not recognize the new area code and number, or because he had not updated that number in his stored contact list in the device or handset. There will be no such problem with an overlay of the 717 area code because no one will be forced to change his or her number.

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C. An Overlay Will Promote Optimal Numbering Resource Utilization and Ease of Any Future Area Code Relief.

Rather than pigeonhole available numbering resources in one smaller geographic area or another, as would be the case in a geographic split, an overlay of the 717 NPA will provide a more efficient means of allocating numbering resources throughout the affected area by allowing telephone numbers to be available for use across the entire footprint of the original 717 area code. This will allow numbering allocation to mirror actual demand, avoiding the need to “predict” where future resources are needed, as is the case with geographic splits.¹² Such predictions are fraught with peril, often leading to the need to implement relief measures in areas where growth was unforeseen.

Another significant advantage of an overlay is that once the overlay is implemented, any future overlays required to provide additional area code relief can be implemented with little or no impact on customers. Thus, it will be very easy to implement an additional overlay of the 717 NPA area in the future in the event that the supply of available telephone numbers again approaches exhaust (as has now happened twice in little more than a decade). However, if a geographic split of the 717 NPA were implemented now, future relief efforts would require the Commission to decide once again between a geographic split and an overlay, with future splits dividing the area into ever smaller pieces, making implementation increasingly complex and controversial.¹³

¹² Split lines are recommended by NeuStar (as the North American Numbering Plan Administrator) based on its analysis of likely future demand patterns, to ensure that the split areas are relatively balanced and have similar life expectancies after the split. Such analysis is not necessary with an overlay.

¹³ The patchwork quilt of single-NPA enclaves in the City and County of Los Angeles vividly illustrates the disadvantages of multiple splits. When the California Commission, in response to explosive growth in the demand for numbers, repeatedly split area codes in the county, the result was numerous, extremely small area codes. In more recent relief decisions in the Los Angeles area and elsewhere, the California Commission has understandably opted for overlays as the better choice.

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D. Customers Adjust Quickly To 10-Digit Dialing.

Virtually the only surviving perceived advantage of a geographic split is that it permits continued 7-digit dialing of local calls within each now smaller area code.¹⁴ By contrast, if an overlay for the 717 NPA is adopted, FCC rules require that all calls within the geographic area of the overlay must be dialed by using 10 digits.¹⁵ Any perceived dialing advantage afforded by a split is largely ephemeral. The industry's experience both in Pennsylvania and in the many other states where overlays have been implemented over the past 15+ years is that customers quickly adapt to 10-digit dialing. After a customer education campaign and a transition period, the new dialing pattern becomes second nature and customer complaints rarely appear.¹⁶ Moreover, the short-term inconvenience associated with adjusting to a new dialing pattern is greatly outweighed by the costs and inconvenience incurred by customers who must change their landline and wireless telephone numbers as a result of a geographic split.

Furthermore, with the availability of advanced devices and services, the vast majority of customers now use landline and wireless handsets that significantly reduce the labor associated with "dialing." Most telephone sets have electronic features which can be programmed to place calls with a few, if any, keypad strokes, and in some instances even offer voice-activated dialing. Most sets also retain the numbers of recently received calls, information which can be used both for quickly returning calls with a few keypad strokes and for programming numbers to be called in the

¹⁴ Splits decrease the size and thus the value of the 7-digit dialing area, and would not prevent some customers from having to dial 10 digits for local calls they previously made by dialing 7 digits because their local communities of interest have been bisected by the split boundary.

¹⁵ 47 C.F.R. § 52.19(c)(3)(ii).

¹⁶ Even if a customer remains unaware of the overlay's coming implementation throughout the customer education campaign, after mandatory 10-digit dialing begins, he will hear a recording on all 7-digit dialed calls reminding him to dial 10 digits to complete those calls, and thus can readily adjust his dialing to use 10 digits ubiquitously.

future. As a result, the incremental customer burden of dialing 10 rather than 7 digits is far less than it once might have been.

Additionally, since many customers have and use cell phones to place both wireless local and long distance calls whether in their home markets or while roaming, they are already accustomed to using 10-digit dialing extensively and thus can easily do so on their landline phones as well. Accordingly, implementation of an overlay in the 717 NPA will be much more accepted and less confusing than it might have been more than a decade ago, when overlays were in their relative infancy.

As the Idaho commission recently observed

[D]eveloping technology and services that utilize telephone numbers will eventually drive seven-digit dialing into obsolescence in the future. Consequently, implementation of a geographic split may only serve to prolong seven-digit dialing for a short period of time. Thus, any future dialing change and relief planning will be eased by the implementation of ten-digit dialing now rather than later. Additionally, it must be noted that the vast majority of phone number dialing is now done automatically by cellular phones, digital devices, and computers, alleviating the need to remember numbers. The Commission sees these trends continuing.¹⁷

III. THE IMPLEMENTATION PERIOD FOR AN OVERLAY NPA SHOULD BE THIRTEEN MONTHS.

The experience gained by the industry in having implemented over 60 overlays in 30 states and Puerto Rico now has shown that the minimum workable overlay implementation period is 13 months. This encompasses six months for network preparation and customer education, six months for permissive 7- and 10-digit dialing, and one month of mandatory 10-digit dialing before the new NPA can be activated.

¹⁷ *In The Matter Of The Application Of Neustar, Inc. For Approval Of NPA Relief Plan For The 208 Area Code*, Case No. GNR-T-15-06 (Idaho PUC November 2, 2015) http://www.puc.idaho.gov/fileroom/cases/tele/GNR/GNRT1506/ordnote/20151102FINAL_ORDER_NO_33414.PDF.

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While there is less network preparation for an overlay of the 717 NPA than there would be for a geographic split,¹⁸ there is nevertheless still much work required in the carriers' networks to successfully implement permissive 7- or 10-digit dialing as a prelude to the conversion to mandatory 10-digit dialing for the overlay. Compressing all this work into a shorter period would substantially increase the risk of mistakes and oversights which could result in uncompleted calls and otherwise create customer confusion when the permissive dialing period begins.

Trying to telescope this six-month period for 717 NPA overlay network preparation into some shorter period would also reduce the concurrent customer education period needed to prepare customers for the start of permissive 7- or 10-digit dialing. Truncating this education period would disrupt the schedule of staged customer communications and reinforcement messages customers receive in overlay implementations. This would increase the chances that some customers "won't get the word" and thus will be confused when mandatory 10-digit dialing begins.

Similar concerns would apply to any abbreviation of the industry's recommended six-month period of permissive 7- and 10-digit dialing. Industry experience has shown that six months are necessary for customers who are accustomed to dialing seven digits for local calls to adapt to dialing 10 digits for such calls before mandatory 10-digit dialing begins.¹⁹ Experience has also demonstrated that a six-month interval is the minimum amount of time needed by alarm companies

¹⁸ Network preparation for a split of the 717 NPA would take longer than six months because of its increased scope and complexity, and because it is the major work effort involved in a split. In New Mexico, for example, the industry had about a nine-month period for split network preparation in the 505 area code with an overall schedule of about 24 months to implement the Commission's ordered split. Given that the 505 split implementation had numerous technical issues surface and the fact that many vendors no longer support splits, the Joint Carriers estimate that they would need a similar or even longer overall schedule -- 24 months at a minimum -- to fully implement a split in the 717 NPA.

¹⁹ In some current overlay implementations, the permissive dialing period is longer than six months to ensure customers and alarm companies have plenty of time to adapt to dialing 10 digits. For example, see NANPA Planning Letter 490 detailing a 9-month permissive dialing period for the Idaho 208 overlay, and NANPA Planning Letter 485 detailing an 11-month permissive dialing period for the New York 315 overlay. Planning Letters can be accessed at https://www.nationalnanpa.com/planning_letters/index.html.

to make any required changes to customer premises auto-dialers, by businesses and PBX customers to prepare for and make their equipment and data base changes, by consumers to reprogram other types of equipment like life safety systems, speed dialing buttons on home and wireless phones and any remote call forwarding settings, and by carriers to complete preparation for the mandatory dialing change.

Consequently, the Joint Carriers ask the Commission to issue a timely overlay approval order well in advance of the currently projected second quarter of 2018 exhaust date for the 717 NPA and in time to permit the needed 13-month overlay implementation period to run its full course.

IV. ANSWERS TO THE COMMISSION'S SPECIFIC QUESTIONS

A. What is the shortest amount of time [a split] can be implemented? Would a 6-month timeframe for implementation of a split be feasible? What aspect of implementing a split is the most significant for the industry and how long does this take to complete?

No, a 6-month timeframe for implementation of a split is not feasible. A split implementation requires an even longer timeframe than an overlay implementation as half of impacted customers are required to change their telephone numbers to the new NPA. It has taken an average of 18 to 24 months to complete a split implementation based on the Joint Carriers' prior experience. Additional activities must take place when an NPA split is ordered as opposed to an overlay. Carriers must coordinate ANI- conversion for all impacted switches to convert databases/records for customers moving to the new area code during the permissive dialing period. In addition to the technical issues the Joint Carriers have addressed previously (i.e. number porting, NPAC, Caller ID issues), the industry will encounter more problems and issues dealing with newer technology that are driven by telephone numbers (VoIP, Apps and databases driven by TNs) if required to implement an NPA split. And given that no one has attempted to implement a split in almost a decade, over which all of these new technologies and applications have burgeoned, there is

risk that the industry will lack the knowledge and manpower to address issues that might arise, which would require an even longer implementation period.

B. Referencing proposed overlays (835 over 610/484 and 445 over 215/267) in Southeastern Pennsylvania, the Commission asks if a similar situation is possible for the 717 NPA?

The shorter schedule is not possible for the 717 NPA because it is an initial overlay and therefore is not in a similar situation as the referenced Southeastern Pennsylvania examples. It is important for the Commission to recognize that there is a difference between the amount of time needed to complete an initial overlay versus a subsequent overlay where some of the systems work, including 10-digit dialing, has already been implemented. Southeastern Pennsylvania already went through initial overlay implementations in 1999 where mandatory local 10-digit dialing was put in place. For that reason, a six month implementation time line was feasible for two subsequent overlays. However, this is not the case for the 717 NPA region, and the Commission should look instead to the experience implementing an initial overlay. The initial 267 and 484 overlay area codes, for example, were implemented over a Commission-ordered 14 ½ month period – six months for network preparation and customer education, six months for permissive dialing, and 75 days for mandatory 10-digit dialing.²⁰

Southeastern Pennsylvania completed initial NPA overlay implementations in 1999 where customers underwent the mandatory local 10-digit dialing changes and they had second overlay (subsequent overlay) implementations adding the third area code in 2001, which took a shorter time. The beauty of implementing an overlay is that impacted customers will only go through one dialing change experience. Once the initial NPA overlay has been implemented for the region, all

²⁰ *Petition of NPA Relief Coordinator Re: 215/610 Area Code Relief Plan*, Dkt. No.C-00961061, Order on Reconsideration, entered May 21, 1998, pp. 37-38, 41.

subsequent overlay (additional area code) implementations can be implemented in a shorter duration and have less customer impact.

C. Could the industry undertake to implement an overlay for the 717 NPA but not actually activate that new overlay NPA until total exhaust of the 717 NPA?

Yes, the industry can implement an overlay for the 717 NPA and hold off on activating the new overlay NPA until total exhaust of the 717 NPA occurs. But this would require that the mandatory 10-digit local dialing conversion is completed and in place prior to activation of the new NPA code.

When the Connecticut DPUC issued its 203/475 NPA overlay decision in 2009, the DPUC ordered statewide 10-digit local dialing which included the mandatory 10-digit dialing changes to the 860 NPA region. At the time when the 203 NPA overlay order was issued, the 860 NPA was not forecasted to exhaust until 2011. Actual NPA relief implementation for the 860 NPA region did not take place until 2014, but thanks to the DPUC's decision to put 10-digit dialing in place earlier, the 860 overlay implementation completed successfully without any impact to customers.²¹

However, the Commission should not delay activation of a new overlay area code until the exhaust of the existing 717 area code. This would be contrary to the industry practice of activating overlays and beginning to provide overlay numbering resources somewhat in advance of complete exhaust of the existing area code to avoid any delays in getting needed numbers.

²¹ *DPUC Review of Management of Telephone Numbering Resources in Connecticut – 475 Area Code Overlay*, Docket No. 96-11-10RE06 (CT PUC March 26, 2009) AT 12 (“Implementing 10-digit dialing in the 860 NPA at the same time as the 475 area code overlay occurs in the 203 NPA will minimize customer confusion, provide for a uniform dialing pattern throughout the state and would be less costly to implement now than when the 860 area code exhausts in the second quarter 2011. Because the 860 area code is not expected to exhaust until the second quarter of 2011, the Department will not require the implementation of area code relief at this time in that NPA”).

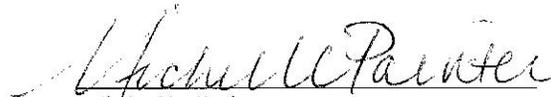
D. Could the requirement of ten-digit dialing be suspended until the new overlay NPA were fully activated?

No, the overlay implementation includes preparing (which includes customer education and network preparation) and converting impacted switches to 10-digit local dialing. The Joint Carriers and the rest of the industry cannot have the new overlay NPA activated without completing the mandatory 10-digit dialing first. Further, a firm date for the implementation of mandatory 10-digit dialing must be established so that carriers have time to prepare and send the necessary educational communications to their customers.

CONCLUSION

As evidenced by the fact that no geographic splits have been ordered in more than a decade anywhere in the country, an overlay for relief of the 717 area code will provide many more advantages than a geographic split. Most significantly, an overlay will not require any customers to change their telephone numbers. In addition, an overlay will eliminate the need for the Commission to pick the “winning” side of the split that would retain the 717 area code. For all the reasons set forth in these joint comments, the industry urges the Commission to approve an overlay for the existing 717 NPA, and provide a 13-month relief implementation period well in advance of the existing area code exhaust date.

Respectfully submitted,



Michelle Painter
PA Bar ID No. 91760
Sprint
12502 Sunrise Valley Dr
Reston, VA 20196
(571) 287-8097
Michelle.painter@sprint.com

Attorney for Sprint

Joseph Monaghan/MP

Joseph Monaghan
AT&T
One AT&T Way, Room 3A114
Bedminster, NJ 07921
(908) 234-7750
jm242x@att.com

Attorney for AT&T

Christopher Arfaa/MP

Christopher M. Arfaa (Pa. ID #57047)
Hawke McKeon & Sniscak LLP
100 N. Tenth Street
Harrisburg, PA 17101
(717) 236-1300 x231
cmarfaa@hmslegal.com

Counsel for T-Mobile

Suzan D. Paiva/MP

Suzan DeBusk Paiva
PA Bar ID No. 53853
Verizon
1717 Arch St, 3rd Fl
Philadelphia, PA
(215) 466-4755
Suzan.D.Paiva@verizon.com

Attorney for Verizon

Cesar Caballero/MP

Cesar Caballero
Windstream
4001 N. Rodney Parham Road
Little Rock, AR 72212
(501) 748-7142
cesar.caballero@windstream.com

Attorney for Windstream

Sue Benedek/MP

Sue Benedek, Esquire
PA Bar ID No. 60451
240 North Third Street, Suite 300
Harrisburg, PA 17101
(717) 245-6346
sue.benedek@centurylink.com

Attorney for CenturyLink