

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 10, 2016

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17101

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

Dear Secretary Chiavetta:

Enclosed for filing are the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

/s/ Barrett C. Sheridan  
Barrett C. Sheridan  
Assistant Consumer Advocate  
PA Attorney I.D. # 61138

Enclosure

cc: Law Bureau  
TUS  
Certificate of Service

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CERTIFICATE OF SERVICE

PETITION FOR APPROVAL :  
OF NUMBERING PLAN AREA : Docket No. P-2015-2510230  
RELEIEF PLANNING FOR THE :  
717 NPA :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 10<sup>th</sup> day of May 2016.

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PAID

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION FOR APPROVAL OF** :  
**NUMBERING PLAN AREA RELIEF** : **Docket No. P-2015-2510230**  
**PLANNING FOR THE 717 NPA** :

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**COMMENTS  
OF THE  
OFFICE OF CONSUMER ADVOCATE**

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**I. INTRODUCTION**

The Pennsylvania Office of Consumer Advocate (OCA) hereby files these Comments in response to the Order entered by the Pennsylvania Public Utility Commission (Commission) in the above-captioned matter on March 10, 2016 and published in the Pennsylvania Bulletin on March 26, 2016. In this Order, the Commission discusses area code exhaust for the 717 Numbering Plan Area (NPA) that comprises southcentral Pennsylvania.<sup>1</sup> In its March Order, the Commission seeks Comment on “how to implement the new area code” and “when the new area code needs to be implemented.” March Order at 7.

As indicated in the Commission’s Order, a petition was filed on October 23, 2015 by Neustar Inc., (Neustar), the North American Numbering Plan Administrator (NANPA), in its role as neutral third party area code relief planner for Pennsylvania. In that Petition, Neustar requested that an “all services distributed overlay for the geographic area covered by the 717

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<sup>1</sup> The geographic area covered by the 717 NPA is comprised of all or part of thirteen (13) counties stretching from Mifflin County in the north to Fulton County in the west and Lancaster County in the east, and includes Harrisburg, Carlisle, York, Camp Hill, Lebanon, Lancaster, Hershey, Gettysburg and Chambersburg.

NPA” be implemented. Id. at 1, 3. With an area code overlay, a new area code is introduced to the same geographic area as the existing area code. This form of area code relief requires “10-digit dialing” for all calls but eliminates the need for approximately half of the area code to automatically change their number to a new area code. In contrast, implementing area code relief through a “geographic split” allows customers to retain 7-digit dialing for all calls, but approximately half of the population would need to change signage and printed material, as well as reprogram any auto-dialing equipment, to recognize the new area code. According to Neustar estimates, the 717 NPA was projected to exhaust, i.e., run out of assignable telephone numbers, during the third quarter of 2018. Id. at 2.

In response to the Commission’s first question regarding how to implement the new area code, the OCA concurs with the recommendation that area code relief should be implemented for the 717 NPA in the form of an all services overlay. The OCA’s support is based on its experience developed in past area code exhaust proceedings. The OCA notes that the Commission has directed that public input hearings be scheduled. A number of consumers, businesses, and local government interests have already filed brief comments. The OCA submits that consumer input is important, to assist in determining the better solution for consumers in the current 717 NPA and to identify specific needs for consumer education, as part of the implementation of any area code relief.

As to the second question, concerning when the new area code needs to be implemented, the OCA submits that answer depends in part on technical issues and information best provided by Neustar and the industry. The OCA continues to support the Commission’s efforts to assure that the available 717 NPA blocks of numbers are efficiently used and that telephone utilities comply with the Commission’s number conservation efforts.

The OCA submits that area code relief should only be approved after it is determined by the Commission that a new area code is in fact truly needed.

I. COMMENTS

A. The OCA Supports Implementation Of An All Services Overlay

To the extent that the Commission determines that an additional area code is necessary, the OCA supports the industry recommendation for the implementation of an all services overlay. The area code overlay maintains the same geographic scope of the area code but adds a new area code to the area. The area code overlay requires all telephone calls to be made using 10-digit dialing and requires consumers to use two different area codes for local calls in their own area. An area code overlay, however, avoids a boundary line being drawn that requires all residential and business customers on one side of the boundary to receive a new area code and incur the costs associated with having a new area code.

As experience has been gained with overlay area codes in other portions of the Commonwealth and the Nation, however, concerns about these competitive and consumer issues related to area code overlays have been alleviated or reduced. As more overlays have occurred, and with the further deployment of cell phones, consumers now are less inclined to associate an area code with a particular geographic area and have become more accustomed to 10-digit dialing. This has also been accompanied by advances in telephones themselves, where many calls now are made with the push of a single button, rather than the dialing of seven, ten or eleven digits. Consumer outreach and education have also accompanied area code overlays. Additionally, because wireless users often keep their same telephone number when moving to different area codes, the area code has become less distinctive. The competitive disadvantage in

having a phone number with an area code that may not match the traditional area code for a particular geographic location appears to be less significant. The OCA has come to the conclusion that the disadvantages of implementing an area code overlay are less than the disadvantages associated with implementing a new area code via a “geographic split.” In particular, with a geographic split, approximately half of all consumers and businesses instantly need to change their telephone number. Geographic splits have a larger impact on a greater number of existing customers due to changes required in customers’ existing telephone numbers.

As such, the OCA agrees that the Commission should implement an all services area code overlay but only after it is determined that such additional numbering resources are necessary.

B. Consumer Input And Consumer Education Are Important Parts Of The Commission’s Determination

The OCA supports the Commission’s intent to hold public input hearings in different parts of the 717 NPA. Such an opportunity for public participation is critical since any future area code changes will impact those consumers. Comments and testimony presented by consumers may also help the Commission refine consumer education efforts.

Of the comments filed thus far by interested consumers, businesses and local interests, the OCA notes that there are comments which support an overlay<sup>2</sup> and others which support a

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<sup>2</sup> Comments of East Manchester Twp. (filed Mar. 18, 2016). See also, Comments of Linda Fry of Dillsburg, PA (filed Mar. 11, 2016). Ms. Fry supports an overlay, noting that 10-digit dialing is already required for cell phone calls and that pre-programmed dialing simplifies matters. Comments of Gwen Newell (filed Mar. 11, 2016). Ms. Newell opposed the possible division of Lancaster County into two area codes, under a geographic split. She supports an overlay. Comments of Richard Seabrease (filed Mar. 12, 2016). Based on 42 years experience in the telecommunications field, Mr. Seabrease supports an overlay as more efficient and less costly than a geographic split. Comments of Jim Finnan (filed Mar. 12, 2016). Mr. Finnan supports an overlay, stating that the area code assigned to friends he might call does not matter. Mr. Finnan himself is the Harrisburg area with a telephone with a 570 area code. Comments of Timothy J. Knepp, Jr. of New Cumberland, PA (filed Mar. 16, 2016). Mr. Knepp supports an overlay, stating that he already has to dial ten digits for much of calling already.

geographic split.<sup>3</sup> One freight business with numbers ported from Harrisburg to Hershey stresses the importance of avoiding any change to the numbers already assigned and in use by the business.<sup>4</sup> Another consumer supports a third option of a geographic split, with a different boundary line, to avoid interference with established dialing pattern without need to dial an area code.<sup>5</sup> A couple in Letterkenny Township oppose a geographic split out of concern that calls that are currently local calls would become more expensive toll calls.<sup>6</sup>

The OCA submits that these early comments by the public illustrate the various interests that the Commission must balance in making its determination, including public convenience, economic impact, and the breadth of consumer experience with modern telephone services and technology. Whether the Commission decides in favor of an overlay or a geographic split, the OCA submits that consumer education must be a key part of the implementation process, to dispel any misconceptions and to minimize the inconvenience and economic impact of the area code changes.

C. More Information Is Needed To Determine An Appropriate Time Frame For Implementation, Once The Commission Determines That Relief Is Required And Decides Whether To Order An Overlay Or Split.

As part of the March Order, the Commission questioned whether the thirteen-month timeline proposed by the Neustar Petition for implementation of an overlay in the 717 NPA is necessary or whether some shorter time frame is possible. Order at 10-11. The Commission asked for comment on a number of specific questions directed at determining: how much lead time is needed, in advance of the expected exhaustion date of the 717 NPA, to commence the

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<sup>3</sup> Comments of Mary Lapp of Lancaster, PA (filed Mar. 14, 2016). Mrs. Lapp supports a geographic split as less likely to cause customer confusion. See also, Comments of Thomas C. Matteson of Lititz, PA (filed Apr. 8, 2016). Mr. Matteson states that an overlay with 10-digit dialing should be the last resort.

<sup>4</sup> Comments of Professional Freight Services of Harrisburg, PA (filed Mar. 28, 2016).

<sup>5</sup> Comments of Bernard A. Thome of Elizabethtown, PA (filed Mar. 11, 2016).

<sup>6</sup> Comments of John L. and Viola A. Keefer of Letterkenny Twp, PA (filed Apr. 21, 2016). Mr. & Mrs. Keefer anticipate that if local calling areas are effected, folks will abandon their landline service.

relief process; what is the shortest amount of time to implement an overlay; is a 6-month timeframe for implementation of a geographic split feasible; and what is the most significant challenge to industry in implementing a split and the time required. Id.

The OCA appreciates the Commission's efforts to obtain this information from current industry participants. The OCA notes that the Federal Communications Commission's June 2015 decision to allow interconnected Voice Over Internet Providers (VOIP) direct access to numbering resources,<sup>7</sup> rather than obtaining number resources as customers of telecommunications carriers, may impact demand for NPA blocks of numbers in ways not yet accounted for by Neustar's forecasts. The OCA will review the responses of other parties regarding the appropriate triggers and timelines for implementation of area code relief. At a minimum, the OCA submits that any reasonable timeline for implementation of area code relief, whether an all-services overlay or a geographic split must address the need for consumer education and sufficient time for the transition in dialing patterns.

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<sup>7</sup> In the Matters of Numbering Policies for Modern Communications, WC Docket No. 13-97, et al., Report and Order, 30 F.C.C. Rcd. 6839 (rel. June 22, 2015), appeal pending sub nom National Association of Regulatory Utility Commissions v. F.C.C., Docket No. 15-1497 (U.S. Ct. App., D.C. Cir.).

## II. CONCLUSION

The Office of Consumer Advocate supports the Commission's efforts to develop a record based on public input and comments from the telecommunications industry and other interested parties to develop a strategy to address the need for 717 NPA area code relief, as projected by Neustar. The OCA looks forward to the public input hearings and further opportunities to weigh in on these important issues.

Respectfully Submitted,



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