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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. Box 3265
Harrisburg, PA 17105-3265

In the Matter of

NeuStar, Inc. in its Role as North American)	
Numbering Plan Administrator) Docket No. P-2015-2510230
) Dated March 10, 2016
Petition for Approval of Numbering Plan) Pennsylvania Bulletin
Area Relief Planning for the 717 NPA) Date: March 26, 2016

COMMENTS

Six years ago, NeuStar, Inc. (NeuStar) advanced its first proposal to overlay the current 717 Area Code region with another area code. The goals of this petition were essentially the same as the goals in this proceeding, and resulted in Docket [P]-2009-2136951 with proceedings.

During the Comment and Hearing processes for Docket # 2009-2136951, a few questionable aspects were exposed, which led to retention of seven-digit dialing in the long-time 717 Area Code region.

Again — as with Docket # 2009-2136951 — questionable elements lurk within NeuStar's proposal in the above-cited Docket P-2015-2510230.

Agenda is clear: Get everybody in every state to dial at least ten (10) digits for every telephone number dialed. This will help boost sales of computer-driven telecommunication devices. Exhibit A, page 6 proves this deduction in the NeuStar petition in Point # 15.

In preparing my Comments in response to Docket # 2009-2136951, I found that many fast-paced businesses relied heavily on seven-digit dialing.

Ten-digit dialing naturally resulted in more mistakes, with more time consumption on-line for telecommunications facilities due to repeat dialings. Lost time due to telephone dialing mistakes has never been an asset to any business. Back then, a lot of manual hunt-and-peck dialing was a reality. Today, there's less of that, due to touch-bars on computer-screen touch pads — but still, a lot of manual dialing takes place, especially in smaller shops and stores. New customers and new acquaintances mandate accurate first-time dialing.

Family members and acquaintances live in overlaid areas nationwide. In overlaid areas, the responses I hear are always the same: "We got used to it [**dialing at least ten digits** for every number dialed]. **However, the inconvenience never goes away.**"

Stationery is always used as a defense mechanism in favor of overlays. In this day and age of e-mails and easily changed **computerized letter formats**, less and less pre-printed stationery is being used. Favor leans toward improved business cards and newer-looking mail pieces — which requires ever-new updated printings. Thus, the rationale that an Area Code will need to be changed on stationery or business cards (if an Area Code regional split occurs) **holds little if any water**, due to frequent turnover and computer-driven stationery with each letter.

A geographic split, therefore, will pose at most a temporary hardship on the business world. If new, updated, better-looking stationery is indeed mandated as the result of a geographic split, the expeditious

and more-accurate convenience of seven-digit dialing will be greatly appreciated by all.

Also of concern is NeuStar's assertion that people will lose their current telephone numbers, with the intimation that they will be assigned new numbers. In reality, people should retain their prefix and suffix numbers in a geographic split, due to current telephone number portability laws. **Only one area code would change.**

The lists of Pro-and-Con arguments favoring an overlay show serious contrivance in NeuStar's petition. Additional "Con" elements which should have been listed against an overlay include: **more mistakes** in ten-digit dialing, **more on-line** telecommunication time consumed during mistake-dialing periods, **more customer confusion** in making sure they have the right Area Code for all new telephone numbers dialed, the **frustration** of dialing ten digits when each neighbor is called across the street, **inconvenience** of ten-digit dialing which **never goes away**, and unrelenting adverse **economic impact against businesses** which must use frequent seven-digit dialing (such as automotive repair centers) very rapidly as part of their standard business-day practices.

Clearly, no solution is perfect. However, a well-placed geographic split will be of far greater long-term advantage than an overlay, due to lower mistake dialings and area-code overlay confusion factors.

However, two other options should be used before a geographic split is considered. First and foremost, **too many numbers remain available and unused in the current 717 Area Code region.** Second, a multi-layer

assignment protocol could be used, which would keep the 717 Area Code in use for at least another 500 to 900 years, without need for another area code in the region. More about this during the hearing process.

In basic research for this filing, I examined a portion of one of our state's oldest local prefixes. Greencastle, Pennsylvania has had the 597 prefix for at least fifty-five years, since 1960-1961. I well-remember that general time period, when we changed from an operator-and-switchboard system to electromechanical switching. In the last fifty-five (55) years, we probably have at least **twenty (20) percent of all available numbers yet vacant or unused in the 597 prefix area.** This finding proved true during the past five weeks of checks on **all** numbers sequentially within the (717) 597-1000 through (717) 597-1999 block, in which **278 (27.8 percent) of these numbers are now unused.**

Most notably, Neustar didn't provide a general profile of all unused telephone numbers in the 717 Area Code region in the current petition. During hearings for Docket # 2009-2136951 six years ago, it became clear that only sixty (60) percent of all telephone numbers in the 717 Area Code region had been assigned. **Why the secrecy?**

Yes, I realize that a certain number of telephone numbers must be kept in reserve. Others must be held unused for six months after vacation by a former customer. I've noticed that several numbers of deceased or moved acquaintances have remained without assignment for several years, when I recently checked on those numbers. **REQUESTED: The Pennsylvania PUC needs to find out how many numbers are unassigned or**

held by companies in unused blocks, and then make a wise decision in behalf of potentially aggrieved Pennsylvania citizens.

I'm concerned that **multi-layer** telecommunication technology isn't in the picture. If this was currently implemented, there wouldn't be any need for this docket proceeding.

Also of concern is the fact that, nationwide, we are approaching the exhaustion of area codes. When that happens, thirteen-digit dialing will become mandatory for all overlaid areas.

Most amazing is the number of people who support an overlay; and, in so-doing, want more long-term inconvenience. On-line comments thus far posted declare this to be a fact, given those who support overlay.

However, many others cannot afford to be more greatly inconvenienced **long-term** by imposition of an overlay. Requested: We need complete information and hearings, for best decision-making.

In conclusion, we first need to use more of today's available numbers. Beyond this, a geographic split will best serve the long-term needs of citizens involved, with the 717 Area Code remaining in the Harrisburg and Capitol Region areas, per the map set forth in NeuStar's petition.

Respectfully submitted,

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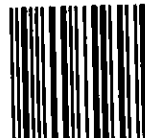
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