

curr  
stahl  
760mm  
wigfall  
p5 comm

3706 Tech Avenue  
Winston-Salem, NC 27017-5232  
March 5, 2001

(H) (336) 788-7308  
(W) (336) 777-1550

OFFICIAL COPY

Ms. Geneva S. Thigpen, Chief Clerk  
N.C. Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

FILED

MAR 06 2001

Clerk's Office  
N.C. Utilities Commission

Dear Ms. Thigpen:

P-100, Sub 137c

I will be unable to attend either of the scheduled upcoming public hearings with the N.C. Utilities Commission regarding Docket #P-100, Sub 137c. I am writing to encourage you to do three things in these proceedings concerning how to provide relief for area code 336. I would like to take this opportunity to, shall we say, put in my two cents' worth, even though I doubt, of course, whether I can say anything worthwhile here that you have not heard already.

1. Please support the telecommunications industry's recommendation to the N.C. Utilities Commission that an OVERLAY plan be utilized, and NOT a geographic split.

I realize that many compelling arguments have been made in favor of both a split and an overlay. An overlay is not an ideal solution. But an ideal solution probably does not exist. Despite its disadvantages, I remain convinced that, on balance, an overlay plan seems like the most satisfactory option, certainly for the long term, if not for the short term as well.

I need not devote much space to reminding you of the expense and hassle of repeated area-code changes (such as we here in the Triad suffered in the 1990's -- two of them in just four years) to government, business, and residential customers alike, as they find themselves forced to print new business cards, stationery, and brochures; re-paint the sides of delivery trucks; change Rolodexes and address books; notify out-of-town friends and relatives; ... And not only is there inconvenience to those whose own area code changes, but there is also inconvenience to those who might wish to get in touch with them. I have found that easily half or more of the out-of-town phone numbers in my files and lists both at home and at work are incorrect because, in other parts of the country, a geographic split was chosen instead of an overlay, and thus the area code on my list has become out of date in only a few short years.

Such a state of affairs should not be allowed to continue. Granted, none of us will like the nuisance of having to dial ten digits just to call our next-door neighbors (a problem, however, that is mitigated considerably, as you know, by speed dialing), but that

seems a small price to pay for the assurance that our area code never need change again, as long as geographic splits are avoided. The ten-digit numbers that we will have, we will be able to keep most likely for the rest of our lives. (If every permissible permutation were put into use right now, ten digits would allow roughly two dozen different phone numbers for each man, woman, and child in America -- surely enough to last us for a while.)

Among the other advantages of an overlay plan:

- It immediately ends the bickering between cities over which one gets to keep the old area code.

- It puts the burden of adopting a new area code where it belongs -- namely, on newcomers to the region, and on users of cell phones, pagers, and fax machines. After all, they are chiefly responsible for our needing a new area code in the first place.

In summary, an overlay seems to be the longest-lasting and most equitable method of meeting the ever-increasing demand for telephone numbers.

2. But speaking of the possible need for ten-digit dialing just to call my neighbor... please ask the Federal Communications Commission why in the world that will be necessary between two numbers that have the same area code, and also please do what you can to get them to change this rule unless they can offer an incredibly persuasive answer. The ONLY valid immediate objection that I can see to an overlay plan is a concern for those who do not yet have speed dialing on their phones, particularly low-income people and the elderly. Why should they be forced to either deal with needless extra digits, or buy a new phone, simply to accommodate what appears to all the world to be a quirk in FCC rules or laziness on the part of phone companies? Indeed, for some residential customers, the change to universal ten-digit dialing could present a genuine hardship. Please pardon the sentimentality, but I have mental pictures of arthritic fingers struggling to dial or punch in the redundant area code, and of forgetful old grandmothers confounded by newfangled phones. It is the job of telephone-service providers not only to avert such problems, but also to come up with solutions that are, where possible, invisible to the user. Especially with today's technology, it seems that telephone companies should not find it difficult to program their equipment to simply assume that, if no area code is supplied when a call is made, the area code of the destination is intended to be the same as that of the source. Unless there is some insurmountable obstacle to such programming, the FCC and the telecommunications industry owe it to us as far as I am concerned. Mandatory ten-digit dialing is, in my judgment, far from being sufficient grounds to choose a split instead of an overlay, but convincingly addressing this objection should go a very long way toward quelling public opposition to the NANPA recommendation.

3. Please push for legislation, where such does not exist already, to deal with the problem of small local phone companies and other groups that buy large blocks of phone numbers but then leave some of them unused. These may constitute only a fraction of all the phone numbers in area code 336, but every bit helps! Certainly, before implementing something like a measure as a new area code, we should take pains to ensure that none of the current phone numbers are wasted.

I would very much appreciate receiving a personal reply for item #2, above.

Thank you very much for your prompt and careful attention to these important matters.

Sincerely yours,

*Eric T. Gatewood*

Eric T. Gatewood

P.S. Apologies for the horrible type quality—  
printer problems.