

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

Docket No. P-100, Sub 137c

In the Matter of  
Area Code Relief for North Carolina's 336 )  
Numbering Plan Area )

**COMMENTS OF TW TELECOM OF NORTH CAROLINA L.P.**

tw telecom of north carolina l.p. ("TWTC") respectfully submits these Comments in response to the Order Establishing Procedures, Scheduling Hearing and Requesting Comments issued March 11, 2014 ("Order") in the above-captioned proceeding.

TWTC is a North Carolina CLP providing service to customers in, among other areas, the 336 Area Code. In its Order, the Commission seeks comment on various proposals for addressing a projected exhaustion in available numbers for the 336 area code and requires that affected carriers provide customer notice (by publication in newspapers of general circulation and bill insert, U.S. Mail or electronically).<sup>1</sup>

TWTC supports the industry recommendation that the Commission adopt a "distributed overlay" plan as the relief plan for the 336 area code.<sup>2</sup> It is the position of TWTC that, although it would require a ten digit dialing, an area code overlay is the preferred solution. Implementation of an overlay will permit current customers to retain existing telephone numbers, contrary to a geographic split, which would require nearly half of the consumers to change to change numbers. TWTC believes that consumers have become accustomed to ten digit dialing in mobile phone usage and in other popular

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<sup>1</sup> TWTC wishes to advise the Commission that it has complied with the customer notice requirements set forth in the Order.

<sup>2</sup> TWTC reserves the right to supplement its comments should the industry recommendation be revised or amended.

areas adopting the overlay solution. Given this, and the disruption potentially caused by other solutions requiring substantial numbers of consumers to change phone numbers, TWTC contends the overlay alternative would be the least disruptive to the 336 area code state region.

Dated: June 10, 2014

Respectfully submitted,

*tw telecom of north carolina l.p.*



By: \_\_\_\_\_

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## CERTIFICATE OF SERVICE

The undersigned, of the law firm Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that he has served a copy of the foregoing **Comments of tw telecom of north carolina l.p.** via electronic mail or regular mail addressed to counsel of record in this proceeding

This 10<sup>th</sup> of June, 2014.



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Marcus W. Trathen