

BEFORE THE  
NORTH CAROLINA UTILITIES COMMISSION

**FILED**

MAR 07 2001

Clerk's Office  
N.C. Utilities Commission

In the Matter of )  
PETITION FOR APPROVAL OF )  
NUMBERING PLAN AREA RELIEF )  
FOR AREA CODES 336 )  
Docket No. P-100, Sub 137c )

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COMMENTS OF THE LEXCOM TELEPHONE COMPANY

Pursuant to the hearing on March 13, 2001 before the North Carolina Utilities Commission on the proposed overlay area code, LEXCOM Telephone Company ("LEXCOM") files these comments. Due to the steady increase of various numbering devices, ranging from cell phones, pagers, and fax machines to actual increased line usage, the Lexington calling area is confronted with a shortage of numbers for which only a new area code can adequately resolve.

Current area codes will exhaust on or before the year 2003 and a plan to provide NPA relief must be adopted. The Piedmont Triad calling area has had its share of area code changes during the past several years. We are of the opinion that the area code overlay approach is the best, most farsighted and fairest solution to the Numbering Plan Administration ("NPA") relief problem in North Carolina. During testimony to the North Carolina Utilities Commission in 1997, the overwhelming preference of the public witnesses was to retain their current area code assignment. The area code overlay approach is the only option that allows the Commission to satisfy that request. A "quick fix" offered by a geographic split solution should be rejected for the better long-term solution offered by an overlay plan. A consumer education plan should be implemented to explain to customers the overlay and its impact.

No party, witness or commenter seriously suggests that ten-digit dialing is not an eventuality for North Carolina. In fact, during 1997 testimony to the NCUC, two public witnesses who were corporate telecommunications managers acknowledged that ten-digit dialing is an eventuality. The concerns they expressed, that ten-digit dialing be implemented on a statewide basis and that it be done after a period of sufficient public education, can both be accommodated. Area code overlays are already in use elsewhere and offer a **permanent solution** to the NPA exhaustion problem.

A proposal that existing seven-digit dialing be saved is not in the public interest. This would substantially advance the exhaust date if a geographic split plan were proposed. Without protecting current seven-digit dialing, any proposed geographic split is likely to provide relief for no more than five years. In contrast, an overlay area code plan will provide long range area code relief. Any potential for customer confusion associated with overlays can be reduced or eliminated by public education. North Carolina went through such an experience successfully when we went from eight to 11 digit toll dialing, and LEXCOM believes that such customer awareness programs will alleviate consumer concern.

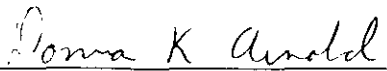
The Commission recently delayed the implementation of the overlay in the 704 area code to allow the alarm industry more time to re-program systems to be ten-digit compatible. The Public Staff's recent proposed order has subsequently recommended that alarm companies consider the use of 800 numbers in its re-programming. LEXCOM fully supports this position. Alarm companies should also implement a consumer awareness program.

### CONCLUSION

The Commission has adequate time to act deliberately in this matter. While this is an important decision, there is ample time for the Commission to make a reasonable decision and for companies to implement a consumer education program which will minimize the difficulties of transitioning to an overlay area code plan.

Respectfully submitted, this the 5<sup>th</sup> day of March, 2001.

LEXCOM Telephone Company

  
By: Donna K. Arnold