

**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

March 2, 2001

FILED

MAR 02 2001

Clerk's Office
N.C. Utilities Commission

SP-01-CAC336-1510

Mr. Dave Dening
180 Jame Lane
Stokesdale, North Carolina 27357

OFFICIAL COPY

Dear Mr. Dening:

This is in reference to your recent letter regarding the North Carolina Utilities Commission's proposals to provide area code relief in the 336 area code. In your letter, you oppose the use of an overlay plan to provide this relief. Mr. Robert Gruber, Executive Director of the Public Staff - North Carolina Utilities Commission, has asked me to respond on his behalf.

The issues involved in this matter are very complex, and any decision the Utilities Commission makes will be controversial. As you know, the two options available to provide area code relief are the overlay and the geographic split. There are several advantages and disadvantages associated with each option that impact various customer groups in different ways.

With an overlay option, existing customers experience no number change since they will retain the same area code currently affiliated with their telephone numbers. However, all local calls (basic local and expanded local) currently dialed using seven digits will have to be dialed using ten digits (area code + 7 digit telephone number). This dialing pattern is a requirement set out by the Federal Communications Commission (FCC). Also, ten-digit dialing under the overlay will not result in any change in the type of call or rates associated with the same calls previously dialed using seven digits. However, customers should not dial a 1 or 0 before the ten-digit number; such dialing could result in the calls being billed by the subscriber's intraLATA carrier as a toll call.

With a geographic split option, approximately one-half of the existing customers in the 336 area code would be assigned a new area code. While all calls made within the geographic area of each of the remaining 336 area code and the new area code would be dialed using seven digits, all local calls made going between the two area codes would require ten-digit dialing. Due to the extensive amount of seven-digit dialed local calling in the 336 area today, many of those routes would convert to ten-digit dialing as the result of implementing a geographic split. This difference in dialing patterns could potentially lead to customer confusion of having to decide when to dial seven or ten digits when making local calls within the geographic area previously covered by only the 336 area code.

Executive Director
733-2435

Communications
733-2810

Economic Research
733-2902

Legal
733-6110

Transportation
733-7766

Accounting
733-4279

Consumer Services
733-9277

Electric
733-2267

Natural Gas
733-4326

Water
733-5610



Denning
March 2, 2001
Page Two

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As I am sure you are aware, more area codes will be needed in the future. The current expectation is that the 336 area code will exhaust or run out during the fourth quarter of 2002. It is currently projected that an overlay area code assigned to the 336 area code will provide sufficient numbers for approximately nine years before additional relief will be needed. There is also a very real concern about running out of area codes nationally in the next 12 to 15 years. At this time, the Commission is developing ways to extend the life of area codes by considering measures to conserve numbers and more efficiently utilize the numbers available.

We appreciate your taking the time to contact our offices. I am providing copies of your letter to the Public Staff's Legal and Communications Division for consideration in our preparation for this case. The original has been given to the Chief Clerk of the Commission for inclusion in the official file.

Sincerely,



Carol Kimball Stahl, Director
Consumer Services Division

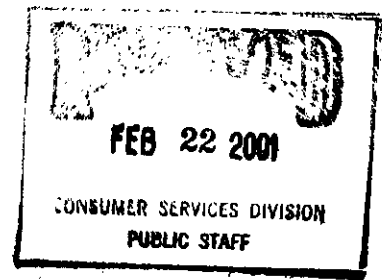
CS/

cc: /Chief Clerk's Office – Docket P-100, Sub 137c
(w/ original letter)

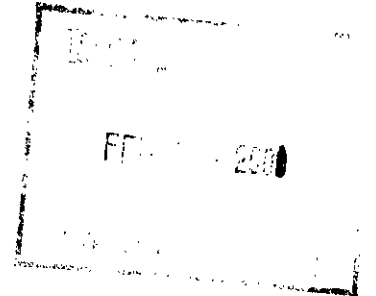
Public Staff – Communications Division
(w/ copy of letter)

Public Staff – Legal Division
(w/ copy of letter)

180 Jamie Lane
Stokesdale, NC 27357
February 21, 2001



Mr. Robert P. Gruber
Executive Director – Public Staff
4326 Mail Service Center
Raleigh, NC 27699



Re: Docket No. P-100, SUB 137c

Sir:

A third compromise in the 336 area code region may provide the most desirable solution.

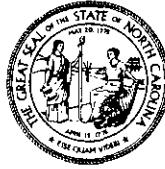
The mechanism is a simple continuation of existing practice. When area code 336 numbers are depleted, overlay the new area code so that new phones receive the new XXX area code. However, maintain the current 7-digit calling within an area code. This makes the transition transparent to existing customers.

The new phones will need 10-digit calling to reach the 336 area code and 336 customers will need 10-digit calling to reach the new phones. But, current patterns for local calling within the 336 region will not be changed.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Dening". The signature is written in a cursive, flowing style.

Dave Dening



FILED

MAR 02 2001

Clerk's Office
N.C. Utilities Commission

**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

March 2, 2001

BELL-01-CAC336-1503

Henry W. Burnett, M.D.
730 Highland Oaks Drive, Suite 203
Winston-Salem, North Carolina 27103

OFFICIAL COPY

Dear Dr. Burnett:

This is in reference to your recent letter regarding the North Carolina Utilities Commission's proposals to provide area code relief in the 336 area code. In your letter, you oppose the use of an overlay plan to provide this relief. Mr. Robert Gruber, Executive Director of the Public Staff - North Carolina Utilities Commission, has asked me to respond on his behalf.

The issues involved in this matter are very complex, and any decision the Utilities Commission makes will be controversial. As you know, the two options available to provide area code relief are the overlay and the geographic split. There are several advantages and disadvantages associated with each option that impact various customer groups in different ways.

With an overlay option, existing customers experience no number change since they will retain the same area code currently affiliated with their telephone numbers. However, all local calls (basic local and expanded local) currently dialed using seven digits will have to be dialed using ten digits (area code + 7 digit telephone number). This dialing pattern is a requirement set out by the Federal Communications Commission (FCC). Also, ten-digit dialing under the overlay will not result in any change in the type of call or rates associated with the same calls previously dialed using seven digits. However, customers should not dial a 1 or 0 before the ten-digit number; such dialing could result in the calls being billed by the subscriber's intraLATA carrier as a toll call.

With a geographic split option, approximately one-half of the existing customers in the 336 area code would be assigned a new area code. While all calls made within the geographic area of each of the remaining 336 area code and the new area code would be dialed using seven digits, all local calls made going between the two area codes would require ten-digit dialing. Due to the extensive amount of seven-digit dialed local calling in the 336 area today, many of those routes would convert to ten-digit dialing as the result of implementing a geographic split. This difference in dialing patterns could potentially lead to customer confusion of having to decide when to dial seven or ten digits when making local calls within the geographic area previously covered by only the 336 area code.

Executive Director 733-2435	Communications 733-2810	Economic Research 733-2902	Legal 733-6110	Transportation 733-7766
Accounting 733-4279	Consumer Services 733-9277	Electric 733-2267	Natural Gas 733-4326	Water 733-5610



Burnett
March 2, 3001
Page Two

Business customers that would be assigned a new area code under a geographic split generally prefer an overlay to avoid printing and advertising expense associated with changing their area code. Also, wireless or cellular providers generally prefer an overlay to avoid the expense of having to reprogram cellular phones for those customers affected by an area code change. It has been suggested that wireless providers be given their own area code. At this time, the FCC does not allow service specific (example, wireless service) area codes. The consensus of the residential customers the Commission has heard from is to prefer a geographic split as opposed to having to dial all local calls using ten digits under an overlay.

As I am sure you are aware, more area codes will be needed in the future. The current expectation is that the 336 area code will exhaust or run out during the fourth quarter of 2002. It is currently projected that an overlay area code assigned to the 336 area code will provide sufficient numbers for approximately nine years before additional relief will be needed. There is also a very real concern about running out of area codes nationally in the next 12 to 15 years. At this time, the Commission is developing ways to extend the life of area codes by considering measures to conserve numbers and more efficiently utilize the numbers available.

We appreciate your taking the time to contact our offices. I am providing copies of your letter to the Public Staff's Legal and Communications Division for consideration in our preparation for this case. The original has been given to the Chief Clerk of the Commission for inclusion in the official file.

Sincerely,



Carol Kimball Stahl, Director
Consumer Services Division

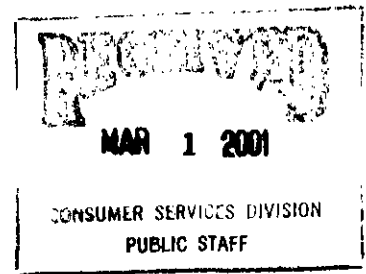
CS/

cc: / Chief Clerk's Office – Docket P-100, Sub 137c
(w/ original letter)

Public Staff – Communications Division
(w/ copy of letter)

Public Staff – Legal Division
(w/ copy of letter)

Henry W. Burnett, M.D.
Diseases and Surgery of the Retina and Vitreous
730 Highland Oaks Drive, Suite 203
Winston-Salem, NC 27103
(336) 765-3930



February 14, 2001

Robert P. Gruber
Executive Director – Public Staff
4326 Mail Service Center
Raleigh, NC 27699-4326

Dear Mr. Gruber:

I am writing to comment about the proposed "distributed overlay" for the 336 area code. I am strongly opposed to this idea given the enormous cumulative inconvenience of having to dial 10 digits every time a phone call is made. Think of the amount of times phone calls are made in this region and multiply that by the inconvenience of dialing extra numbers plus the uncertainty of remembering which of the two area codes for the region would be used for a given number.

A far more simpler solution would be to establish a new area code for fax machines and/or cellular phones and beepers. Usually people know when they are calling a cellular phone or beeper and this would be a minor inconvenience to switch current cellular phone and beeper uses to this.

If this were not possible, I think that a smaller regional based area code system would be better and if it is a problem knowing when current regions would run out of area codes again, simply make them smaller and add more area codes to begin with.

I appreciate your considerations.

Sincerely,

A handwritten signature in cursive script, appearing to read "H. W. Burnett".

Henry W. Burnett, M.D.

HWB/sm



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

March 2, 2001

FILED

MAR 02 2001

Clerk's Office
N.C. Utilities Commission

SP-01-CAC336-1502

Mr. Stanley Welsh
1128 Old Salem Road
Kernersville, North Carolina 27284

ORIGINAL COPY

Dear Mr. Welsh:

This is in reference to your recent letter regarding the North Carolina Utilities Commission's proposals to provide area code relief in the 336 area code. In your letter, you oppose the use of an overlay plan to provide this relief. Mr. Robert Gruber, Executive Director of the Public Staff - North Carolina Utilities Commission, has asked me to respond on his behalf.

The issues involved in this matter are very complex, and any decision the Utilities Commission makes will be controversial. As you know, the two options available to provide area code relief are the overlay and the geographic split. There are several advantages and disadvantages associated with each option that impact various customer groups in different ways.

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With a geographic split option, approximately one-half of the existing customers in the 336 area code would be assigned a new area code. While all calls made within the geographic area of each of the remaining 336 area code and the new area code would be dialed using seven digits, all local calls made going between the two area codes would require ten-digit dialing. Due to the extensive amount of seven-digit dialed local calling in the 336 area today, many of those routes would convert to ten-digit dialing as the result of implementing a geographic split. This difference in dialing patterns could potentially lead to customer confusion of having to decide when to dial seven or ten digits when making local calls within the geographic area previously covered by only the 336 area code.

Executive Director
733-2435

Communications
733-2810

Economic Research
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Welsh
March 2, 2001
Page Two

Business customers that would be assigned a new area code under a geographic split generally prefer an overlay to avoid printing and advertising expense associated with changing their area code. Also, wireless or cellular providers generally prefer an overlay to avoid the expense of having to reprogram cellular phones for those customers affected by an area code change. It has been suggested that wireless providers be given their own area code. At this time, the FCC does not allow service specific (example, wireless service) area codes. The consensus of the residential customers the Commission has heard from is to prefer a geographic split as opposed to having to dial all local calls using ten digits under an overlay.

As I am sure you are aware, more area codes will be needed in the future. The current expectation is that the 336 area code will exhaust or run out during the fourth quarter of 2002. It is currently projected that an overlay area code assigned to the 336 area code will provide sufficient numbers for approximately nine years before additional relief will be needed. There is also a very real concern about running out of area codes nationally in the next 12 to 15 years. At this time, the Commission is developing ways to extend the life of area codes by considering measures to conserve numbers and more efficiently utilize the numbers available.

We appreciate your taking the time to contact our offices. I am providing copies of your letter to the Public Staff's Legal and Communications Division for consideration in our preparation for this case. The original has been given to the Chief Clerk of the Commission for inclusion in the official file.

Sincerely,

A handwritten signature in black ink, appearing to read 'CK Stahl', written over a horizontal line.

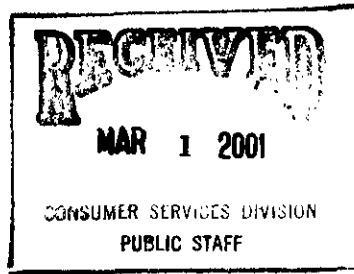
Carol Kimball Stahl, Director
Consumer Services Division

CS/

cc: ✓ Chief Clerk's Office – Docket P-100, Sub 137c
(w/ original letter)

Public Staff – Communications Division
(w/ copy of letter)

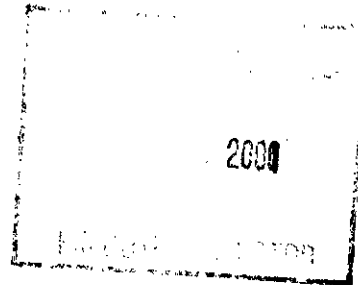
Public Staff – Legal Division
(w/ copy of letter)



Stanley Welsh
1128 old Salem Road
Kernersville, N.C. 27284

Feb. 26, 2001

Robert P. Gruber
Executive Director-Public Staff
4326 Mail Center Drive
Raleigh, N.C. 27699-4326



Mr. Robert Gruber

In regards to the question of overlapping area codes in the current 336 area code, would it be advantageous to make all cellular phones one area code and leave the existing 336 area code for land line residential and businesses customers. This would still require some 10 digit dialing between cell phones and land line phones and vice versa but all calls between land line phones within the 336 area code would only require 7 digits as it is now. This solution would only put the burden on cell phone users to have thier phones changed over to a new area code.

This is not the perfect solution but one that is worthy of consideration.

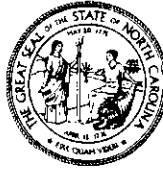
Please also consider senior citizens who would in some situations have difficulty with the area code overlap system.

Thank you for taking the time to read my letter and I hope you will considerate this a viable solution for the present situation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stan Welsh".

Stan Welsh



FILED

MAR 02 2001

Clerk's Office
N.C. Utilities Commission

**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

March 2, 2001

BELL-01-CAC336-1450

Mr. Romenesko
2014 Boulevard Street
Greensboro, North Carolina 27407

OFFICIAL COPY

Dear Mr. Romenesko:

This is in reference to your recent letter regarding the North Carolina Utilities Commission's proposals to provide area code relief in the 336 area code. In your letter, you discuss your views on the impact some of the options will have on the citizens of this state. Mr. Robert Gruber, Executive Director of the Public Staff - North Carolina Utilities Commission, has asked me to respond on his behalf.

You have raised an important issue which, as you realize, impacts the exhaust of numbers within a specific area code: unused numbers. Both the Federal Communications Commission (FCC) and the North Carolina Utilities Commission (NCUC) have acknowledged that problem by creating dockets which require changes in some of the industries practices. If numbers assigned by the North American Numbering Plan Administrator (NANPA) are not activated within certain time frames, reclamation will occur. The numbers would then be free to be assigned to another carrier.

The FCC issued its Numbering Resource Optimization (NRO) Order In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, Report and Order and Further Notice of Proposed Rule Making, FCC 00104, on March 31, 2000, which was effective July 17, 2000. That Order delegated more responsibility to the states regarding code reclamation and granting extensions of time to carrier to meet code activation deadlines. To address that added responsibility, the NCUC established its own docket.

Docket No. P-100, Sub 146, "In the Matter of Central Office Code (NXX) Reclamation" was created on November 17, 2000, by order of the NCUC. The initial order was entitled, "Order Establishing the Reclamation Procedure for Unused Central Office Codes." The processes are outlined and the role the NCUC will play clearly defined. By making more numbers available through reclamation of unused NXX codes, the NCUC hopes to relieve some of the problems faced by both the consumers and carriers which result from the proliferation of area codes within the state.

Executive Director 733-2435	Communications 733-2810	Economic Research 733-2902	Legal 733-6110	Transportation 733-7766
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In addition, the FCC in its NRO Order is in the process of establishing a program that will also better utilize the numbers available by setting up a 1000-block number pooling arrangement. There are 10,000 individual numbers available for each NXX which are currently all assigned to one carrier when requested. Under the pooling arrangement, NXX numbers will be shared by assigning blocks of 1000 numbers to different carriers. That assignment process will better utilize the 10,000 numbers available and reducing the demand for NXX's. The NCUC is currently in the process of establishing such a 1000-block pooling arrangement in North Carolina. However, it is unlikely that either this program or the reclamation program will produce results soon enough to delay needed area code relief for the 336 area. Both programs should extend appreciably the life of new area codes.

The issues involved in the 336 area code exhaust are very complex, and any decision the Utilities Commission makes will be controversial. As you know, the two options available to provide area code relief are the overlay and the geographic split. There are several advantages and disadvantages associated with each option that impact various customer groups in different ways.

With an overlay option, existing customers experience no number change since they will retain the same area code currently affiliated with their telephone numbers. However, all local calls (basic local and expanded local) currently dialed using seven digits will have to be dialed using ten digits (area code + 7 digit telephone number). This dialing pattern is a requirement set out by the Federal Communications Commission (FCC). Also, ten-digit dialing under the overlay will not result in any change in the type of call or rates associated with the same calls previously dialed using seven digits. However, customers should not dial a 1 or 0 before the ten-digit number; such dialing could result in the calls being billed by the subscriber's intraLATA carrier as a toll call.

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Business customers that would be assigned a new area code under a geographic split generally prefer an overlay to avoid printing and advertising expense associated with changing their area code. Also, wireless or cellular providers generally prefer an overlay to avoid the expense of having to reprogram cellular phones for those customers affected by an area code change. It has been suggested that wireless providers be given their own area code. At this time, the FCC does not allow service specific (example, wireless service) area codes. The consensus of the residential customers the Commission has heard from is to prefer a geographic split as opposed to having to dial all local calls using ten digits under an overlay.

Romenesko
March 1, 2001
Page Three

We appreciate your taking the time to contact our offices. I am providing copies of your letter to the Public Staff's Legal and Communications Division for consideration in our preparation for this case. The original has been given to the Chief Clerk of the Commission for inclusion in the official file. If you have additional questions regarding these dockets, you are welcome to contact Mr. Hugh Gerringer, an engineer with the Public Staff's Communications Division, at 919/733-2810.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Stahl', written over the typed name.

Carol Kimball Stahl, Director
Consumer Services Division

CS/

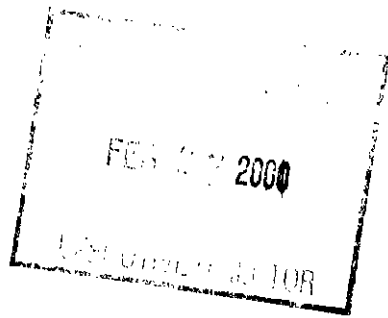
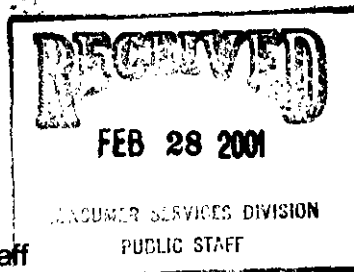
cc: / Chief Clerk's Office – Docket P-100, Sub 137c
(w/ original letter)

Public Staff – Communications Division
(w/ copy of letter)

Public Staff – Legal Division
(w/ copy of letter)

Romenesko Family
2014 Blvd. St.
Greensboro, NC 27407

Robert P. Gruber
Executive Director – Public Staff
4326 Mail Service Center
Raleigh, NC 27699-4326



RE: SOLUTIONS TO AREA CODE NUMBERS RUNNING OUT

Dear Mr. Gruber:

In reading the Notice of two area codes and ten-digit dialing regarding area code 336 I wish to ask a question.

In examining a map of NC it appears we have far more growth in numbers demands than some of the fastest states growing faster than NC.

I remember years ago when I was involved with the industry directly and the toll free numbers were running short of supply. When deeper examination was conducted it was found that the numbers were not running short due to usage but due to hoarding by telephone companies. It was also at that time apparent that if those numbers not being used were to be set free there was plenty of space for growth without adding additional toll free codes.

I find it difficult to believe that all possible numbers in the Area Code 336 would be completely used up in less than two years. When that statement is being made is it truthful or is it a generalized way of condoning growth by allowing various carriers to hold blocks of "possible use" numbers?

Obviously, this question would require answering in writing from the companies that have access to the numbers knowing those who signed the letters would be held responsible for the answers.

Please understand that it is not that I have lost trust in the communications industry in total but from the start of the billing I receive each month and the poor service I receive each month leads me to believe the industry is not paying as much attention to their services as they could and should.

It continues to shock me that in this age of electronics NC residents continue to pay local bills higher than neighboring states and we are billed \$2.02 per month to keep our names from a book that allows listings for other companies to telemarket our homes and destroy the peace we attempt to maintain. BellSouth should be paying us for keeping our listings out of their books and releasing the lines for other usages.

Thank you for your time.

I would like to hear back from your office on my questions prior to the Greensboro meeting on March 13, 2001.

Sincerely,


Mr. Romenesko