

**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

FILED

MAR 13 2001

*Clerk's Office
N.C. Utilities Commission*

March 13, 2001

BELL-01-CAC336-1828

Mr. Mark C. Mondl
2545 Woodberry Drive
Winston-Salem, NC 27106-4622

OFFICIAL COPY

Dear Mr. Mondl:

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. You oppose the use of the overlay and would prefer a solution which would not require ten-digit dialing: a geographic split. Mr. Robert Gruber asked that I 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

March 13, 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 hope you were able attend the public hearings held Tuesday, March 13, and Wednesday, March 14, at the Guilford Technical Community College - Jamestown Campus, Medlin Campus Center, Ground Level, Room 047, 601 High Point Road, Jamestown. The hearing was an opportunity to make known your views personally.

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)

MAR 12 2001

CONSUMER SERVICES DIVISION
PUBLIC STAFF

MARK C. MONDL
2545 Woodberry Drive
Winston-Salem, NC 27106-4622

March 6, 2001

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

Re: Docket No. P-100, Sub 137c, 336 Area Code Proposed Change

Dear Dr. Gruber:

I read with interest the proposed "distributed overlay" proposal for the relief plan for the 336 area code.

I am not in favor of the proposed "distributed overlay" proposal and instead am in favor of the "geographic split" alternative proposal.

I have lived in Dayton, OH, which went through a "geographic split" to establish a new area code. I also have relatives who own businesses who were affected by a "geographic split."

I believe that half the business in the 336 area code would be impacted by a geographic split. They would incur expenses to print all new media advertising their new telephone number. Client, new and old, must also be informed.

However, the "distributed overlay" proposal would affect everyone. Everyone would not be required to dial 10 digits, even for local calls. Since there is no geographical split, you would not know who has which area code. This would lead to confusion and hindrance on everyone forever.

The costs to the business half that has to change would not be major and would not be recurring. After a short period of time, customers would adjust to the new numbers. Plus there is an adjustment period where incoming calls are still directed to the intended party.

I believe the "geographic split" alternative is the better approach and would be keeping with the area code standards already established. I hope you can adopt the "geographic split" approach and reject the "distributed overlay".

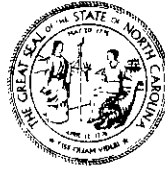
I may be reached at 336-748-0752 (home), 336-727-2061 (RJ Reynolds High School) or at e-mail: mmond1@lycos.com. Thank you for your kind consideration.

Sincerely,

Mark C. Mondl

Mark C. Mondl

Enclosure



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

March 13, 2001

FILED
MAR 13 2001
Clerk's Office
N.C. Utilities Commission
BELL-01-CAC336-1829

Dr. W. Jeffery Miller
2910 Reynolda Road
Winston-Salem, North Carolina 27106

OFFICIAL COPY

Dear Dr. Miller:

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. You oppose the use of the overlay and would prefer a solution which would not require ten-digit dialing. Mr. Robert Gruber, Executive Director of the Public Staff-NC Utilities Commission, asked that I 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.

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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.

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.

In your Item #6, you 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.

March 13, 2001
Page Three

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.

Hopefully, you were able to attend the public hearing scheduled for Tuesday, March 13, and March 14, at the Guilford Technical Community College - Jamestown Campus, Medlin Campus Center, Ground Level, Room 047, 601 High Point Road, Jamestown. The hearing was an opportunity to make known your views personally.

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/

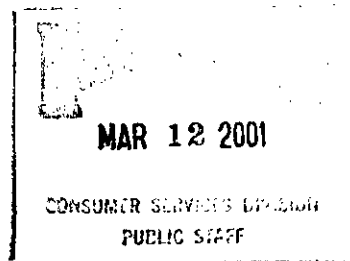
cc: ✓ Chief Clerk's Office – Docket P-100, Sub 137c
(w/ original letter)

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

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

State Utilities Commission

Robert T. Galtner



RE : Overlay plan for Winston-Salem area
03/10/01

I want to register an objection to proposed overlay plan for the Winston-Salem and surrounding area to require the dialing of 336 or new 3 digits to call inside Forsyth county. My objections are as follows:

1. If a person makes one hundred calls a month, that person will dial **THREE HUNDRED** more numbers. If a business makes 1000 calls a month it would mean **THREE THOUSAND** more numbers.
2. All speed dial numbers on every phone would have to be reprogrammed.
3. Every computer in the triad will have to be reprogrammed to access a dial up network including homes, businesses and schools.
4. Speed dial numbers on all cell phones would have to be reprogrammed. Many elderly and handicapped individuals have speed dial and only have to press a button for family and friends.
5. Any voice command dialing system would have to be reprogrammed.
6. All burglar and fire alarm systems that call a central station would have to be reprogrammed. Many control panels can not have the extra digits programmed and will need to be replaced. All this at a cost to the consumer and home owner.
7. Most medical records do not have the area code on them in the area since it is all one area code in our county, these would have to be changed since in time no one will not their correct first 3 digits.
8. Young children who have learned to call will have to be taught to dial 3 more digits.
9. Some elderly citizens will have difficulty learning to dial 3 more numbers to contact their family, church or doctor.
10. More wrong numbers since 10 digits are much harder to remember than 7 digits. I have been told by friends in 10 digit other areas like Atlanta that they often forget the first 3 and just try all combinations for the area.

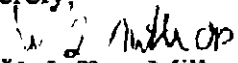
11. Most calls in Winston-Salem are made to other phones in Winston-Salem. Why penalize people who do not call Greensboro or outside the city/county by always dialing 3 more digits to call next door !
12. Since many business do not have the area code on their paper work now, reprinting would be needed to accommodate the extra digits required
13. Since all new numbers will have a different first 3 digits from existing numbers, business may find themselves with more than one "area code" on the same phone if they add another line.

Best Solution is a new area code for half the affected area because:

1. No change to phone systems unless dialing into another area keeping the convince of most phone calls.
2. It is far easier to notify family, friends, and businesses of a new area code that live with dialing 3 more digits for life and having to remember 10 digits to call access the street !
3. New business will not be penalized for having a strange first 3 numbers.
4. The split should be along county lines if technically possible since that would make it easy to know which area code serves which city.
5. I wonder how many blocks of numbers are assigned but not used which could be source of new numbers.
6. Another unanswered question is have all exchange numbers (i.e. first three of current 7 digits) been used. Such as 210-xxxx 211-xxxx, 212-xxxx 213-xxxx 214-xxxx 214----- 219-xxxx then on to 320-xxxx, and so forth. This would accomodate over 9 million phones but I do recognize that number such as 911 do take out a lot of combinations But certain there are many million more than what are needed.
7. It makes sense for 10 digits when it for one city such as Houston, Altanta or New York; however, there are 3 distinct cities (Greensboro, Winston-Salem, High Point) that are hardly the same name. Each could have their own area code !

Laslly the hearing process is poor since it is being held in Jamestown rather than a hearing in both Winston-Salem and Greensboro to accommodate where the people affected live. I doubt if many citizens know where Jamestown is or the location of the hearing. I wonder who is profiting by this proposal to inconvenience many citizens of North Carolina.

Sincerely,


Dr. W. Jeffery Miller
2910 Reynolda Rd
Winston-Salem NC 27106
336-761-1151