

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. P-100, SUB 137c

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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

**EXECUTIVE SUMMARY OF  
THE PUBLIC STAFF**

The Public Staff continues to believe the distributed overlay alternative remains the best option for providing number relief for the 336 area code. As pointed out by NeuStar, Inc., in its role as the North American Numbering Plan Administrator (NANPA), unlike in the case of a geographic split, a distributed overlay would not force communities to be separated by a numbering plan area (NPA) boundary that would require a mixture of seven and ten-digit dialing. The geographic split alternatives would divide at least four counties and create confusing mixtures of seven and ten-digit local dialing. Additionally, as opposed to any of the geographic split alternatives, a distributed overlay would not force customers to change their existing telephone numbers, and any future NPA relief would be more easily implemented without disruption or confusion.

While mandatory ten-digit dialing would be required between and within the old area code and the new area code, this disadvantage is mitigated in large part because each of the geographic split alternatives would require a significant increase in ten-digit dialing by customers for local calls to nearby areas separated by a different area code. Thus, the chief advantage of the geographic

split alternatives would be significantly diminished in regard to relief for the 336 area code.

The Commission has approved distributed overlays for the last two NPA relief proceedings with the first involving relief for the 704 NPA implemented in April 2001 in Docket No. P-100, Sub 137a. More recently, relief for the 919 NPA was implemented in March 2012 in Docket No. P-100, Sub 137b. The Public Staff is aware of only one significant issue regarding these two distributed overlays; an increase in the number of users mis-dialing 911 when attempting to make a ten-digit dialed call in the 919 NPA overlay area. However, so long as the new NPA for the 336 NPA distributed overlay does not start with "91," this issue should not occur with a distributed overlay in the 336 NPA.

Therefore, the Public Staff recommends that the Commission adopt the distributed overlay as the relief mechanism for the 336 area code and request that the assigned NPA for the 336 NPA distributed overlay not begin with "91."