

2nd COPY

P-100, SUB 137C

RECEIVED.

FEB 19 2001

N.C. DEPT. OF JUSTICE  
UTILITIES

My name is Bobby Trospen

My Correct Mailing Address is;

P.O. Box 343

ELKIN, N.C.

28621

**FILED**

MAR 15 2001

Clerk's Office  
N.C. Utilities Commission

I live at 3337 Shatterson Rd., in  
Yadkin County, near Jonesville, N.C..  
in the (336) area code. My phone #527-1526.

Feel free to write or call if any point in  
my letter is in need of clarification or  
further explanation. Thank you for your time.

This cover sheet may be discarded. The  
following letter concerns the proposed change  
to my current area code.

Clerk  
Stahl  
7 Comm.  
Wigfall  
1 Comm.

Mr. Cooper, the Honorable Attorney General,

Please accept this hand-written letter as my complaint concerning proposed changes to the 336 area code. I am printing for clarity.

Current local service providers generally charge a fair rate, but small or unusually configured calling areas make them useless to the average subscriber. Changing or splitting this area code will probably result in an even smaller area of service.

I have maintained for several years an extended calling area plan that allows broader access to numbers within my calling area and using a separate provider for in and out of state calling.

I live in the Jonesville area, my work is in Yadkinville, and my family has Doctors and relatives in ELKIN, Ronda, Mt. Airy, and Winston-Salem, N.C. Almost none of these locations are covered by our local service provider and would incur a large in-state long distance charge. My wife's permanent disability facilitated the need for greater access.

The cost of maintaining the current phone plan is still less than half the cost prior to its implementation. I am currently looking for better, more cost effective plans for phone service.

The 336 area code is still new, having been changed a few years back. When the area code was split or changed, local services changed as well. My current calling plan's value was called into question last year when error numbers from the Winston-Salem area (336), began showing up on bills. I was told by Sprint (ELKIN) that changes to the Winston-Salem area codes and competition with Bell South and other service providers over calling areas was shrinking available calling numbers provided by my plan. Further changes to the area code will make my expensive calling plan useless, perhaps no better than basic local service.

I don't particularly care how many area codes get chopped up or split as long as the state requires the phone companies to offer a larger, basic and extended, calling-dialing areas.

Every individual and small business owner should have access, by phone, to areas they can drive to in fifteen minutes (Twenty-five would be great.) The current calling areas do not serve these taxpayers.

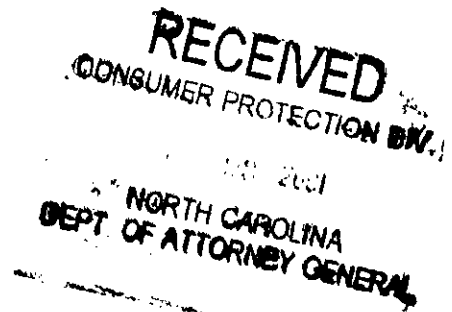
I refuse to paint any of the telephone communication companies as greedy villains. They generally provide a good services at a reasonable price. They are at the center of commerce in our country and we would be worse off without them. However, the state of Carolina must be actively involved in the process, or consumers will ultimately pay more for the same or less service.

No changes to my area codes should be made without protecting the consumers.

Thoughtless change may deny access to the taxpayers, who pay for the right of access, and are often left out of the negotiations. As our Attorney General, you and your office are entrusted with protecting the individuals. Thank you for allowing me to express my feelings on this matter.

Bobby Furman

180 Jamie Lane  
Stokesdale, NC 27357  
February 21, 2001



The Honorable Roy A. Cooper, III  
Attorney General – State of North Carolina  
Post Office Box 629  
Raleigh, NC 27602

FILED

MAR 15 2001

Clerk's Office  
N.C. Utilities Commission

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

Sir:

*P-100, SUB 137C*

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,

*Dave Denning*

Dave Denning

300 Couchs Fish Lake Road  
State Road, 2001  
February 28, 2001

**FILED**

**MAR 15 2001**

Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

Clerk's Office  
N.C. Utilities Commission

To Whom It May Concern

*P-100, SUB 137C*

TEN DIGIT DIALING AND EXTENDED LOCAL SERVICE

I am not opposed to the ten-digit dialing. However, I am concerned how people will know the area code if it is not in a certain area. For example, if I'm calling Statesville, NC I know the area code is 704. Any number I dial in that area will have the 704 area code. If the existing 336 area code will keep the 336 area code, and any new numbers will have the new area code, how will people know the area code if two area codes exist in the same area?

Another area I would like to address is the extended local dialing. I received a rude awakening when I moved from Elkin, NC to State Road, NC. I kept seeing a charge for toll charges and called the telephone company and received a recording explaining the charges. I am a school teacher and am well educated. However, the recording explanation of the charges could have been in a foreign language and I would have understood the same. The recording did not give a good explanation as to why I was being charged for some of my calls and not others. Also, when I received my telephone bill, it did not give me a detailed list of numbers in which I was being charged. I had to ask the telephone company for a detailed list for my toll charges. I was shocked when I found out that I was charged ten cents a minute for calling 15 minutes down the road to Roaring River (prefix of 696) but not charged for calling 30-40 minutes down the road in the same direction to North Wilkesboro and Wilkesboro (prefixes 667 and 838, respectively). I had to call the Public Utility Commission to find out the prefixes I could and couldn't call without being charged.

I understand that some members of the Public Utility Commission requested to have eight digits for toll calls so the public would understand that they would be charged for the call. Instead, consumers can call extended local calls with only seven digits and be charged and not understand why.

Recently, my stepdaughter came to live with us. She is 16 years old and has been known to run up a large phone bill at her mother's house. I telephoned Sprint and expressed my concern. I asked what could be done to prevent her from calling numbers that charged us. The telephone company suggested a 1+ block, which I gladly accepted (this allowed me to call 1-800). I also asked for a block to prevent her from calling the seven digit numbers that charges us on our telephone bill. An employee of Sprint suggested an ELKA block. The block was to take affect on November 13, 2000. Twelve phone calls

Chief Clerk  
Page 2  
February 28, 2001

Later to Sprint, on February 22, 2001, our ELKA block went into affect. Of course, we have to pay for it (\$2.50 per month).

The way the telephone companies have been charging the public for Extended Local Area numbers, without explanation, has been a deliberate attempt to deceive the public and needs to be corrected.

I would like the prefix (874) in State Road, NC be evaluated for what should be considered a toll call. An employee of Sprint told me that State Road is one city out of four in North Carolina that is so limited in the prefixes that can be called without being charged. In the meantime, I would like to request that the Extended Local Service issue also be addressed. I would like to see that calling numbers that will charge consumers have to dial a one before the number. That way the 1 + block will take affect and consumers will know that they will be charged for making that telephone call. If placing a one before the number is not an option, I would like the ELKA block be placed on telephones that request it at no charge. Also, all consumers should receive a detailed toll call list so they can see the telephone numbers in which they are being charged.

If this issue cannot be addressed during the public hearing in March, I would like to know why and whom I can contact for my request.

Sincerely



Mrs. Donna Haynes  
(336) 874-4850 home  
(336) 468-2891 work

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

The Honorable Roy A. Cooper, III  
Attorney General-State of North Carolina  
Post Office Box 629  
Raleigh, NC 27602-0629

Richard T. Shannin  
210 Homewood Ave.  
Greensboro, NC 27403

RECEIVED  
CONSUMER PROTECTION DIV.  
MAR 5 2001

March 2, 2001

Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

FILED

MAR 15 2001

Clerk's Office  
N.C. Utilities Commission

Dear Chief Clerk:

*P-100, SUB 137C*

This letter (which is a slightly edited version of a fax sent to you earlier) is in response to an insert which appeared inside my current telephone bill. This insert was a request by Mr. Robert P Gruber for comments regarding the need for additional telephone numbers.

The current recommendation of 2 area code/10 digit dialing that is before the Commission is the institution of two separate area codes within the area that is now serviced by area code 336. As I understand it, there are four major characteristics of this plan:

1. The new area code would begin to be issued as needed.
2. The two area codes would co-exist within the same geographical confines.
3. Ten numbers would be dialed for local calls.
4. Billing between the two area codes would be the same as if there were only one.

I understand that the need to find new numbers becomes more crucial as the use of telephone equipment continues to grow, and I can only assume that the rate at which new numbers will be needed will grow as well. In the past several years, our area code has been changed twice as the geographical boundaries have shrunk, and now a third change in the form of an additional area code is proposed. What concerns me is not that there have been these changes, but rather that I do not see an end to these changes. Even as the previous change was made, it was hinted that it would only be a few years before another change would have to be implemented.

Knowing this growth to be inevitable, it seems to me that it would be preferable to find an alternative to the pattern of changes which allow the consumer just enough time to adapt to one change just before the next is instituted. Outside of limiting access to new telephone numbers, there would appear to me to be two ways to break this pattern:

1. Make all of the foreseeable changes required for the next fifty or one hundred years at one time, whether this means cutting areas up into little pieces like Swiss cheese, having multiple layers of 3, 4, or 5 area codes, or a combination of both.
2. Institute a new system that would inherently allow for the increased need for telephone numbers.



The first option is what we are doing now, except we are doing it piecemeal, like easing into cold water one inch at a time, instead of taking the plunge. It seems to me that the second option might be a better choice if it could be accomplished.

As you know, a telephone number is not just a string of digits, but rather, is composed of four discrete groups of numbers which are:

1. access to the area code (1 digit)
2. area code (3 digits)
3. exchange (3 digits)
4. personal number (4 digits)

As such, the 7 digits that follow the area code, provide 10 million possible telephone number for each area code used (this is the gross number of combinations, not allowing for numbers that are for special use, reserved for ongoing flexibility, etc.). Thus, each time a new area code is introduced, either by sub-dividing a geographical area or overlaying an existing area, another 10 million numbers are theoretically added. If, however, the 3 digit exchange was increased to 4 digits, each area code would then have 100 million number combinations, giving each area code a 10 fold increase in possible numbers. There are, of course, like most things, advantages and disadvantages to this plan. I do not know all of the issues involved, but a quick review shows the following:

Disadvantages:

1. Every local call made will require 8 digits rather than the present 7 digits.
2. Telephone equipment (both hardware and software) will probably have to be reconfigured. This reconfiguration may need to be very extensive throughout the entire system, from individual handsets to nation-wide switching centers.

Advantages:

1. There will be enough telephone numbers that could be generated so that there should be no concern for future growth.
2. I would suspect that the percentage of possible numbers held back for reserve, etc., could be substantially less than would have to be held back with the present plan.
3. There will be no danger of running out of area codes which might, in the future loom as a problem, especially when the increased rate of new area codes used is compared with the limited pool left after deducting those numbers that are not options for various reasons.
4. People will not have to be concerned that their business or residence telephone numbers may change at any time.
5. People will not have the confusing scenario of having two telephones side by side with different area codes.

In considering the disadvantages listed above, it should be noted that with the plan presently under consideration, each local call will require ten digits to complete, rather than the 8 digits needed by increasing the size of the exchange. The second disadvantage noted above would, I assume, be the main stumbling block to adapting a plan involving a 4 digit exchange. In this regard, there are a number of points to consider:

1. It seems that we are quickly reaching a point where the present system is becoming too unwieldy to continue. You can only make the area so small, or have so many overlaying area codes, before everyday communications become something to avoid rather than embrace.
2. A major change in the way the telephone system operated was required to initially accommodate the use of area codes. While the system is vastly more complicated now than it was then, it will only continue to be even more so in the future.
3. If we run out of 3 digit area codes, the question of whether or not to add an extra digit will become moot.

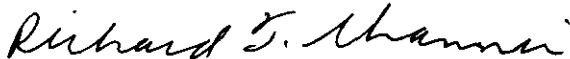
I readily acknowledge that there may be many more issues involved, many of which I may not be aware of. There may, for instance, be a new technology on the horizon which will by its very nature change all of the parameters under which we are now working. Unless the nature of such a technology is now known or anticipated, however, I think it would be foolish to just go along as we are in the mere hope that something will be developed in the near future.

In conclusion let me say that it would appear that increasing the size of the exchange by 1 digit offers a number of considerable advantages over the 2 area code/10 digit plan now being considered.

Thank you for allowing me to present my comments, and if you have any questions or replies to my remarks, please feel free to contact me.

Sincerely,

Richard T. Shannin



cc: Mr. Robert P. Gruber

cc: The Honorable Roy Cooper

Richard T. Shannin  
210 Homewood Ave.  
Greensboro, NC 27403

**FILED**

March 2, 2001

**MAR 15 2001**

Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

Clerk's Office  
N.C. Utilities Commission

*P-100, SUB 137C*

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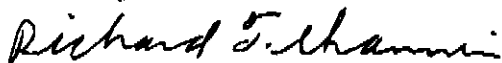
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Sincerely,



Richard T. Shannin

cc Robert P. Gruber

The Honorable Roy Cooper

## FAX TRANSMISSION SHEET

Date 3-2-01 Time 2:00 P.m.To: ROY COOPERFax Number: (919) 716-6757From: RICHARD SHANNINTelephone Number (336) <sup>854-6005</sup> ~~632-9272~~ Fax (336) 632-1411Total no. of pages transmitted including this page 4Message: RE: AREA CODE PLAN

3706 Tech Avenue  
Winston-Salem, NC 27017-5232  
March 5, 2001

(H) (336) 788-9308  
(W) (336) 777-1550

**FILED**

**MAR 15 2001**

Clerk's Office  
N.C. Utilities Commission

The Honorable Roy A. Cooper, III  
Attorney General, State of North Carolina  
P.O. Box 629  
Raleigh, NC 27602-0629

Dear Mr. Cooper:

*P-100, SUB 137C*

I will be unable to attend either of the scheduled upcoming public hearings with the N.C. Utilities' Commission regarding Docket #P-100, Sub 137c. I am writing to encourage you to do three things in these proceedings concerning how to provide relief for area code 336. I would like to take this opportunity to, shall we say, put in my two cents' worth, even though I doubt, of course, whether I can say anything worthwhile here that you have not heard already.

1. Please support the telecommunications industry's recommendation to the N.C. Utilities Commission that an OVERLAY plan be utilized, and NOT a geographic split.

I realize that many compelling arguments have been made in favor of both a split and an overlay. An overlay is not an ideal solution. But an ideal solution probably does not exist. Despite its disadvantages, I remain convinced that, on balance, an overlay plan seems like the most satisfactory option, certainly for the long term, if not for the short term as well.

I need not devote much space to reminding you of the expense and hassle of repeated area-code changes (such as we here in the Triad suffered in the 1990s -- two of them in just four years) to government, business, and residential customers alike, as they find themselves forced to print new business cards, stationery, and brochures; re-paint the sides of delivery trucks; change Rolodexes and address books; notify out-of-town friends and relatives; ... And not only is there inconvenience to those whose own area code changes, but there is also inconvenience to those who might wish to get in touch with them. I have found that easily half or more of the out-of-town phone numbers in my files and lists both at home and at work are incorrect because, in other parts of the country, a geographic split was chosen instead of an overlay, and thus the area code on my list has become out of date in only a few short years.

Such a state of affairs should not be allowed to continue. Granted, none of us will like the nuisance of having to dial ten digits just to call our next-door neighbors (a problem, however, that is mitigated considerably, as you know, by speed dialing), but that

seems a small price to pay for the assurance that our area code never need change again, as long as geographic splits are avoided. The ten-digit numbers that we will have, we will be able to keep most likely for the rest of our lives. (If every permissible permutation were put into use right now, ten digits would allow roughly two dozen different phone numbers for each man, woman, and child in America -- surely enough to last us for a while.)

Among the other advantages of an overlay plan:

- It immediately ends the bickering between cities over which one gets to keep the old area code.
- It puts the burden of adopting a new area code where it belongs -- namely, on newcomers to the region, and on users of cell phones, pagers, and fax machines. After all, they are chiefly responsible for our needing a new area code in the first place.

In summary, an overlay seems to be the longest-lasting and most equitable method of meeting the ever-increasing demand for telephone numbers.

2. But speaking of the possible need for ten-digit dialing just to call my neighbor ... please ask the Federal Communications Commission why in the world that will be necessary between two numbers that have the same area code, and also please do what you can to get them to change this rule unless they can offer an incredibly persuasive answer. The ONLY valid immediate objection that I can see to an overlay plan is a concern for those who do not yet have speed dialing on their phones, particularly low-income people and the elderly. Why should they be forced to either deal with needless extra digits, or buy a new phone, simply to accommodate what appears to all the world to be a quirk in FCC rules or laziness on the part of phone companies? Indeed, for some residential customers, the change to universal ten-digit dialing could present a genuine hardship. Please pardon the sentimentality, but I have mental pictures of arthritic fingers struggling to dial or punch in the redundant area code, and of forgetful old grandmothers confounded by newfangled phones. It is the job of telephone-service providers not only to avert such problems, but also to come up with solutions that are, where possible, invisible to the user. Especially with today's technology, it seems that telephone companies should not find it difficult to program their equipment to simply assume that, if no area code is supplied when a call is made, the area code of the destination is intended to be the same as that of the source. Unless there is some insurmountable obstacle to such programming, the FCC and the telecommunications industry owe it to us as far as I am concerned. Mandatory ten-digit dialing is, in my judgment, far from being sufficient grounds to choose a split instead of an overlay, but convincingly addressing this objection should go a very long way toward quelling public opposition to the NANPA recommendation.



3. Please push for legislation, where such does not exist already, to deal with the problem of small local phone companies and other groups that buy large blocks of phone numbers but then leave some of them unused. These may constitute only a fraction of all the phone numbers in area code 336, but every bit helps! Certainly, before implementing something as a measure as a new area code, we should take pains to ensure that none of the current phone numbers are wasted.

I would very much appreciate receiving a personal reply for item #2, above.

Thank you very much for your prompt and careful attention to these important matters.

Sincerely yours,

*Eric T. Gatewood*  
Eric T. Gatewood

P.S. Apologies for the horrible type quality—  
printer problems.



# HIGH POINT

## CHAMBER OF COMMERCE

RECEIVED

CONSUMER PROTECTION DIV.

January 17, 2001

NORTH CAROLINA  
DEPT. OF ATTORNEY GENERAL

FILED

MAR 15 2001

Clerk's Office  
N.C. Utilities Commission

The Honorable Roy A. Cooper, III  
Attorney General – State of North Carolina  
PO Box 629  
Raleigh, NC 27602

Dear Attorney General Cooper:

*P-100, SUB 137C*

In 1997 the Triad Region was assigned the area code of 336 due to the increased demand for new numbers. With the growth in the area, the supply of numbers in the 336 area code will be exhausted by the fourth quarter of 2002. We feel a new area code would create a tremendous burden on businesses who have would have to make changes in their letterhead, advertisements, signage, bills, invoices, etc.

The High Point Chamber of Commerce is in support of the "overlay" solution. With the overlay method, existing telephone subscribers would not have to change to a new area code. An additional area code would be assigned to the present geographic area of 336 to be used for expansion of services once the 336 numbers are exhausted. We feel this would be the most efficient method for the business community.

Thank you for your consideration.

Sincerely,

Jeff Horney, Chairman  
Board of Directors

Judy Mendenhall, President