

June 11, 2014

VIA ELECTRONIC FILING

Mrs. Gail L. Mount, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

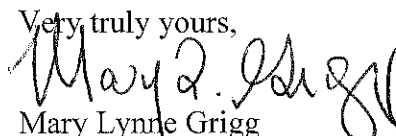
RE: Docket No. P-100, Sub 137C

Dear Mrs. Mount:

On June 10, 2014, the Joint Telecommunications Carriers¹ filed their Joint Comments and Joint Comments Executive Summary. Attached for filing in the same docket is Exhibit A to the Joint Comments. In addition to being attached hereto, the document may also be viewed at the North American Numbering Council website at <http://www.nanc-chair.org/docs/documents16-2013.html>. It is the last document in the column entitled "September 18, 2013 NANC Meeting."

Should you have any questions, please do not hesitate to contact me. Thank you for your assistance in this matter.

Very truly yours,



Mary Lynne Grigg

MLG:kjg

Attachment

¹ The telecommunications and wireless carriers collectively referred to herein as the "Joint Telecommunications Carriers" are: BellSouth Telecommunications, LLC, d/b/a AT&T North Carolina ("AT&T"); Sprint Spectrum, L.P., and Sprint Communications Company L.P. (collectively, "Sprint"); T-Mobile South LLC ("T-Mobile"); Windstream Lexcom Communications, Inc., Windstream Communications, Inc., Windstream North Carolina, LLC, Windstream NuVox, Inc., US LEC of North Carolina, LLC (collectively "Windstream"); North State Telephone Company, d/b/a North State Communications; Carolina Telephone & Telegraph Company LLC, d/b/a CenturyLink, Central Telephone Company, d/b/a CenturyLink, CenturyLink Communications, LLC, and Mebtel, Inc., d/b/a CenturyLink (collectively "CenturyLink"); Randolph Telephone Membership Corp.; and Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of North Carolina d/b/a Verizon Wireless and MCI metro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (collectively "Verizon").

The All Services Overlay is the Best Solution for the Area Code

The LNPA WG supports the all-services overlay for Area Code Relief. This approach minimizes inconvenience to consumers and supports the continuing trend in the United States to utilize overlays as the preferred form of area code relief.

AREA CODE OVERLAY

The application of Area Code Relief methods has continued to evolve since the late 1990's. Overwhelmingly, the preferred method of relief chosen is now the All- Services Area Code (NPA) Overlay. In fact, only one Area Code Split has been implemented in the last 5 years, compared to over 25 Overlays. NPA Overlays have both practical and technical positive implications for customers and service providers alike.

Benefits of All-Services Overlay

1. All current customers retain their existing area code and telephone number; no winners or losers.
2. No discrimination against customers on different sides of a boundary line, as does a geographic split when determining which side gets the new area code.
3. Less customer confusion and easier education process.
4. Minimized financial impact on business customers since there is no need to change signage, advertising, websites, checks and stationery (unless they currently show 7-digit numbers rather than 10-digit numbers).
5. Residential customers are not forced to update personal printed material such as checks or make changes to websites storing telephone numbers (e.g., banking, insurance, credit cards), unless they currently show only 7-digit numbers.
6. Does not split cities or counties into different area codes, keeping communities of interest intact.
7. No impact on some wireless customers that would otherwise require their handsets to be manually reprogrammed.
8. No technical impacts to text messaging, multi-media messaging or smart phone applications.
9. Provides the most efficient distribution of numbering resources by allowing assignments to follow demand, not withstanding forecasts for growth.
10. Minimizes call routing issues, especially with ported numbers.
11. No need for synchronization of old and new area codes in NPAC databases.
12. No technical impacts to number portability or toll-free number routing.
13. Missing and exploited children continue to be able to contact parents since their parents' area code and telephone number would remain the same.
14. Deployed Military personnel continue to have service since their area code and telephone number would not change.
15. No Caller ID confusion.

The All-Services Overlay is the Best Solution for the Area Code

Summary

In addition to the benefits above, an overlay is the superior option for area code relief for the following reasons:

- Most Equitable Approach – Treats all consumers the same
- Least disruptive for the consumer
- Easily implementable, as demonstrated by the large number of successful U.S. implementations since 2007
- Most consumers already comfortable with 10-digit dialing
- Avoids Local Number Portability (LNP) database problems associated with a split (e.g., updates to operational support systems with old and new area codes so port requests complete within the designated porting intervals)
- Facilitates future area code relief efforts