

**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	) ) )	ORDER REQUESTING COMMENTS AND SCHEDULING PUBLIC HEARINGS
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BY THE COMMISSION: On September 7, 2000, Neustar, Inc., in its role as the North American Numbering Plan Administrator (NANPA), filed a petition requesting that the Commission approve an industry<sup>1</sup> recommendation of an all-services distributed overlay relief plan for the 336 NPA. The petition stated, at that time, that the 336 NPA would reach exhaust by the fourth quarter of 2002. However, the implementation of numbering conservations measures, including thousands block pooling in 2002, and a decrease in demand for numbering resources, extended the projected exhaust date.

On January 5, 2001, the Commission issued its *Order Requesting Comments and Scheduling Public Hearing*, to review the relief alternatives for the 336 NPA, as proposed, in the Initial Planning Document (IPD) and discussed by the Industry, on July 27, 2000. In compliance with that Order, comments were received from both the using and consuming public and the Industry participants.

On April 23, 2001, the North Carolina Telecommunications Industry and the Public Staff jointly filed the proposed North Carolina Telecommunications Industry Task Force Proposed Order Approving Overlay Option to Provide Area Code Relief. The Task Force noted in its proposed Order that, at that time, the Commission stressed that its goal and intent was to prolong the service life of the 336 NPA by extensive conservation measures (specifically thousands-block number pooling), and thereby postpone for as long as possible the use of the new area code as well as mandatory 10-digit local dialing.

On September 13, 2001, in Docket No. P-100, Sub 137, the Commission issued its *Order Implementing Thousands-Block Pooling For the 336 Area Code*, with the goal to defer the implementation of area code relief for the 336 NPA for the then foreseeable future.

On June 18, 2003, NANPA notified the Commission that that the 336 NPA was not projected to exhaust within the next five years. Furthermore, NANPA stated that,

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<sup>1</sup> The Industry representatives were: Concord Telephone Company, BellSouth, AT&T, North State Telephone, Lexcom Telephone Company, Sprint, Verizon Wireless, ALLTEL, CTC Exchange Services, Skyline TMC and Carolina West Utilities.

“according to the 2003 NRUF Analysis, the 336 projected exhaust date was pushed back to second quarter 2009. The extension of the projected exhaust is due in part to the implementation of thousands block pooling in February of 2002 and a continued decrease in demand for numbering resources.” NANPA also stated that, according to Industry Numbering Committee (INC) guidelines, the relief petition could be rescinded by the Commission or at least two Industry members. No action was taken as a result of the updated information provided by NANPA.

On June 25, 2004, NANPA notified the Commission that, according to the 2004 NRUF Analysis, the 336 projected exhaust date was expected to be the second quarter 2010. As such, in accordance with INC guidelines, NANPA stated that the relief petition could be rescinded, if desired, by the Commission or at least two industry participants. No action was taken as a result of the updated information provided by NANPA.

On July 22, 2013, NANPA notified the Commission that the projected exhaust date for the 336 numbering plan area (NPA) code had been revised to second quarter 2016. NANPA provided an update of four service alternatives to provide numbering resource relief to the 336 area code and the respective the geographical maps associated with each alternative and projected exhaust date for each alternative. NANPA stated that, it recently released the April 2013 NRUF (Numbering Resource Utilization and Forecast) and NPA Exhaust Analysis which reflected actual data thru December 31, 2012, and the projected demand for numbering resources submitted to NANPA by the Industry<sup>2</sup>. NANPA commented that, under its federal contract, NANPA is required to begin relief planning for area codes 36 months prior to the projected exhaust. Therefore, the 2013 filing was made to update the record in this docket and to renew NANPA’s request for the Commission to approve an industry<sup>3</sup> recommendation of an all-services distributed overlay relief plan for the 336 NPA.

The updated IPD, enclosed in the July 22, 2013 filing, set forth four proposals of relief for the 336 NPA: (1) an all-services distributed overlay – referred to as Alternative #1 in the IPD, (2) a geographic split which encompasses the Winston-Salem, Greensboro, and High Point rate centers, creating a circular geographic area – referred to as Alternative #2, (3) a geographic split with the boundary line following rate center boundaries in a northeastern to southwestern direction placing the High Point rate center to the west of the line and the Summerfield, Monticello, Reidsville, Gatewood and Ruffin rate centers to the east – referred to as Alternative #3, and (4) a geographic split with the boundary line following the rate center boundaries in a northeastern to southwestern direction placing High Point rate center on the eastern side of the line and the Summerfield, Monticello, Reidsville, Gatewood, and Ruffin rate centers on the

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<sup>2</sup> The Industry is comprised of telecommunications entities operating in or considering operations with the 336 NPA in North Carolina.

<sup>3</sup> The Industry representatives were: Concord Telephone Company, BellSouth, AT&T, North State Telephone, Lexcom Telephone Company, Sprint, Verizon Wireless, ALLTEL, CTC Exchange Services, Skyline TMC and Carolina West Utilities.

western side – referred to as Alternative #4. The IPD included NPA maps, descriptions, dialing requirements, and the projected life in years for each relief alternative.

As stated in the IPD, with the all-services distributed overlay, a new area code would be assigned to the same geographic area as the existing 336 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. The remaining three alternatives all involve the use of geographic splits. A split occurs when one geographic area receives a new NPA, while the other retains the current 336 NPA. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven digit local calling could be permitted. The service life for the overlay is projected to be 43.9 years, and the service lives for the splits range from 40.1 to 47.8 years.

WHEREUPON, the Commission reaches the following

### CONCLUSIONS

After careful consideration, the Commission concludes that it is reasonable and prudent to refresh the record in this proceeding due to the changed circumstances that have arisen since this docket was initially opened. As such, the Commission believes that comments should be sought from the public on the updated IPD, which includes the outstanding Industry recommended all-services distributed overlay, as well as, three additional alternatives and that, accordingly, public notices should be sent to all affected subscribers and should be printed in newspapers with circulation throughout the geographic territory covered by the 336 area code.

The Commission further concludes that a public hearing should be held wherein public and the formal parties to this proceeding may again present their views on the matter of area code relief for the 336 area code.

IT IS THEREFORE ORDERED as follows:

1. That members of the general public shall have the opportunity to file comments in accordance with the public notice attached hereto. Such comments shall be submitted not later than February 28, 2014. As the local exchange companies with the largest service areas, BellSouth Telecommunications, Inc. d/b/a AT&T North Carolina, Inc. and North State Telephone Company shall assume primary responsibility for assuring, with the cooperation of the other local exchange companies (LECs), competitive local providers (CLPs), and telephone membership corporations (TMCs) that the publication of the public notice in order to solicit comments from the general public concerning area code relief for area code 336 in North Carolina is effected. Such notice shall be published in newspapers of general circulation throughout the geographic territory covered by the 336 area code and shall not be less than ¼ of a page. Such notice shall be published once a week for two successive weeks concluding by no later than February 21, 2014. Each LEC/CLP/TMC which publishes the attached

public notice, shall not later than February 28, 2014, file affidavits regarding such newspaper publication and a list of papers used for publication and the dates the notice was published in each newspaper.

2. That the LECs and CLPs shall send the public notice as a bill insert, via US Mail or electronically, to their respective subscribers located within the 336 area code once during the period beginning on the date of this Order and ending on February 28, 2014.

3. That TMCs who serve subscribers in the area affected by the proposed plan are hereby encouraged to send bill inserts reflecting any seven-digit dialing routes into the 336 area, as appropriate, to their respective subscribers during the period beginning on the date of this Order and ending on February 28, 2014.

4. That the formal parties to this proceeding shall file comments regarding the industry recommendation, or any alternative proposal, not later than February 28, 2014, with reply comments due no later than March 14, 2014. At a minimum, each formal party to this proceeding shall:

- a) Provide an executive summary of their comments and reply comments setting out in a concise manner all material issues upon which they comment. The executive summary shall apply to any comments exceeding three pages double-spaced.
- b) Set out with specificity any alterations they suggest to the industry recommendation. If any commenters recommend a geographic split for the 336 area code, they shall indicate which counties and exchanges comprise their proposed area codes and, to the extent practicable, the number of access lines therein. Such commenters shall also provide a map of North Carolina by county and, if possible, by exchange, showing boundaries of any area code they propose. Those commenters supporting the industry recommendation of an overlay shall indicate if they have any changes to the industry's proposal, and discuss the merits of the overlay as compared to a geographic split. The industry participants shall fully discuss each of the alternatives they considered, the pros and cons of each alternative, and the reasons which caused them to choose their recommended alternative and to reject the other alternatives.
- c) File comments and reply comments via electronic mail addressed to [briefs@ncuc.net](mailto:briefs@ncuc.net) attaching editable noncompressed files in Microsoft Word or ASCII Text format.
- d) Be encouraged to file jointly.

5. That a public-hearing shall be convened in High Point, North Carolina, on Monday, March 10, 2014 at 7:00p.m., High Point Courthouse – The Washington

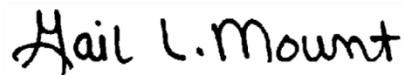
Courtroom, 505 East Green Drive, High Point, North Carolina 27261 and shall resume on Tuesday, March 11, 2014 at 10:00 a.m., at the same location, for the purpose of receiving public comment on the matter of area code relief for the 336 area code. The evening hearing on March 10, 2014 shall be conducted for the sole purpose of receiving testimony and comments from members of the public. Members of the public who are unable to attend the evening public hearing on March 10, 2014, will be allowed to testify on the morning of March 11, 2014. The Commission will receive testimony from all formal parties, including the industry participants, the Public Staff, Attorney General, and any other intervenors on March 11. The formal parties shall present a summary of their written comments and be prepared to respond to questions from the Commission.

6. That the following are hereby made formal parties to this docket: Public Staff, Attorney General, all local exchange companies, all telephone membership corporations, all competitive local providers, and any cellular, PCS, or other wireless company which files comments. Any other person desiring to become a formal party to this docket must be granted intervention according to Commission Rules R1-3, R1-5, and R1-19.

ISSUED BY ORDER OF THE COMMISSION.

This the 21<sup>st</sup> day of January, 2014.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in black ink that reads "Gail L. Mount". The signature is written in a cursive, slightly slanted style.

Gail L. Mount, Chief Clerk

**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 ) NOTICE OF PUBLIC HEARING  
Numbering Plan Area )

NOTICE IS HEREBY GIVEN that on July 22, 2013, Neustar, Inc., in its role as the North American Numbering Plan Administrator (NANPA), notified the Commission that the projected exhaust date for the 336 numbering plan area (NPA) code had been revised to second quarter 2016. In an earlier filed petition, in this docket, Neustar requested that the Commission approve the Industry's recommended all-services distributed overlay relief plan for the 336 area code.

TWO AREA CODES AND TEN-DIGIT DIALING

Industry representatives have recommended a "distributed overlay" as the relief plan for the 336 area code. Under the recommended plan, a new area code would be assigned to cover or "overlay" the entire geographic area using the existing 336 area code boundary lines. This would result in two area codes for the same geographic area. The chief advantage of using an overlay relief plan is that existing telephone subscribers would not have to change area codes or telephone numbers. When telephone numbers in the 336 area code run out, new residential and business telephone numbers for the area would be assigned from the new area code. The chief disadvantage of using an overlay relief plan is that all local calls dialed using seven digits today would have to be dialed using ten digits (336 + seven-digit telephone number or new area code + seven-digit telephone number). A Federal Communication Commission (FCC) regulation would require ten-digit dialing both between and within the 336 code and the new overlay area code.

OTHER SOLUTIONS WERE CONSIDERED

In Neustar's recent filing, three variations of a "geographic split" relief plan were also updated for consideration. Under these plans, the geographic area covered by the 336 area code would be split into two parts. Roughly half of the affected telephone subscribers would continue to be served through the 336 area code, and half would change to the new area code. Although ten-digit dialing would not be required within the area codes, most seven-digit dialed calling routes that exist today in the 336 area code would become ten-digit dialed calling routes in both directions if they are split by the new area code boundary. The industry rejected all geographic split relief plans because

of the necessity of changing the telephone numbers of a large number of subscribers, the difficulty of predicting growth for the two areas, and potential customer confusion as the area is divided into smaller pieces.

#### PUBLIC HEARING TO BE HELD IN HIGH POINT

After carefully considering the updated information filed by Neustar, the Commission has determined that all affected subscribers should have an opportunity to express their views on the recommendation. Accordingly, the Commission will conduct a public-hearing to be convened in High Point, North Carolina, on Monday, March 10, 2014 at 7:00 p.m., High Point Courthouse – The Washington Courtroom, 505 East Green Drive, High Point, North Carolina 27261 and shall resume on Tuesday, March 11, 2014 at 10:00 a.m, at the same location, for the purpose of receiving public comment on the matter of area code relief for the 336 area code. The evening hearing on March 11, 2014 shall be conducted for the sole purpose of receiving testimony and comments from members of the public. Members of the public who are unable to attend the evening public hearing on March 10, 2014, will be allowed to testify on the morning of March 11, 2014. The Commission will receive testimony from all formal parties, including the industry participants, the Public Staff, Attorney General, and any other intervenors on March 11. The formal parties shall present a summary of their written comments and be prepared to respond to questions from the Commission.

Persons desiring to send written statements to the Commission should submit their statement supporting the industry recommendation, or any alternative proposal, on or before March 14, 2014, and should include any information that those persons wish to be considered by the Commission in this matter. Interventions or statements addressed to the Chief Clerk, North Carolina Utilities Commission, 4325 Mail Service Center, Raleigh, North Carolina 27699-4325. Statements may also be faxed to (919) 733-7300.

The Public Staff of the Utilities Commission, through the Executive Director, is required by statute to represent the using and consuming public in proceedings before the Commission. Statements to the Executive Director should be addressed to:

Christopher J. Ayers  
Executive Director - Public Staff  
4326 Mail Service Center  
Raleigh, North Carolina 27699-4326  
Fax: (919) 733-9565

The Attorney General is also authorized by statute to represent the using and consuming public in proceedings before the Commission. Statements to the Attorney General should be addressed to:

The Honorable Roy A. Cooper, III  
Attorney General – State of North Carolina  
Post Office Box 629  
Raleigh, North Carolina 27602 – 0629  
Fax: (919) 716-6757

ISSUED BY ORDER OF THE COMMISSSION.

This the 21<sup>st</sup> day of January, 2014.

NORTH CAROLINA UTILITIES COMMISSION

*Gail L. Mount*

Gail L. Mount, Chief Clerk