

Chief Clerk
North Carolina Utilities Commission
Raleigh, NC

FILED

P-100 Sub 137

MAR 05 2001

March 4, 2001

Clerk's Office
N.C. Utilities Commission

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Dear Sir,

Thank you for the opportunity to comment on the new area code / ten-digit dialing proposed for this area. I have what I feel is a much better solution to the problem than any I have heard or read about. There may be some technical reason why it has not been used, but it is certainly not because it **CAN'T** be done. Allow me to first tell you what is wrong with the proposed action, and then present my idea of a more practical solution to a problem that can only get worse if we continue to add area codes.

Originally, the reason for area codes was that seven digits did not allow enough numbers for the total number of telephone subscribers in the United States. So each state had its own area code, or in some cases, two or even three area codes. This did not present a problem to the users of the system, since it was necessary only to dial seven digits unless calling relatively far away or to another state. In our state, for instance, we knew that anywhere east of the imaginary line running down the middle of our state would be area code 919, and everything west of that was area code 704. To dial anyone in the whole state, we only needed to know a seven-digit number and have some general idea of the geographical location of the person or firm we wanted to call. If we wished to call anyone in South Carolina, we knew it was area code 803.

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As so many area codes have been added in recent years, not only has there been the problem of numbers being different, but as the areas represented by each code have shrunk, it has become increasingly difficult to determine what area code is appropriate for any given subscriber. Indeed, with the new overlapping codes, we can no longer be sure of the area code for anyone in Charlotte, without having it spelled out for us by the subscriber. Overlapping area codes are the same as not using area codes at all, since it requires that each subscriber have a ten-digit number, without any assurance that the number has any recognizable format or any similarity to other numbers in the same location. Having two overlapping area codes is every bit as bad as having five hundred overlapping area codes, as the effect is the same.

My solution: fewer area codes rather than more. I suggest we return to no more than three area codes for any state, and yes, it can be done. It would require that all local subscribers have an eight-digit number rather than a seven-digit one, but consider the benefits of such a change.

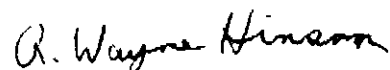
1. It would allow up to ten times as many subscriber numbers in a given area code as is now possible.
2. There would not be the confusion of overlapping area codes.

3. There would be few enough area codes that we would not need a detailed map to figure out what area code goes with what town. Each code would represent a large geographic area just as it did in earlier times.
4. By assigning numbers in a methodical way, it would be possible to look at the format of a number and have some idea of who was being called, thus in many cases, preventing wrong numbers. For instance, if all numbers assigned to government (at all levels) ended in 3 or 4, we could look at the number we were about to call and if it ended in 3 or 4, we would know it was not the number of our Aunt Mary in Buies Creek, NC. Business subscriber numbers could end in 6 or 7. Cell phone numbers could end in 8 or 9. Payphone numbers could end in 0. To aid in the transition, all currently existing numbers could be changed to end in 1 or 2.

To my way of thinking, the idea I have outlined is far more practical than simply continuing to add area codes, which can only be done until we run out of three digit numbers, and then the whole system would have to be overhauled anyway, with even more tumultuous consequences than anything we might do now. Some might argue that eight-digit numbers are harder to deal with than seven-digit numbers, but the alternative we now face is essentially for every number to be a ten-digit number, which is worse by a factor of 100. To the Telephone Company, every number is already a ten-digit number, but for their purposes, since they aren't using the numbers to call anyone, it doesn't make any difference. Changing to what would be (to them) an eleven-digit number would require some upgrades in the infrastructure, but with so much of our communications being computerized, in some cases it would just be a change in the programming of the system.

If such a change is not do-able right now and right here, I implore you to at least get us started toward this or some other solution to the problem of proliferating area codes. The course we are now on serves us poorly, and can only get worse.

Sincerely,



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