

**FILED****MAR 05 2001**

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

Clerk's Office  
N.C. Utilities Commission

**OFFICIAL COPY**

Dear Clerk and Utility Commission Members,

*P-100 sub 137C*

I am a Psychologist in Greensboro, NC, and on the teaching faculty in psychology at a local university. As such, I am familiar with the limitations of the kind of memory we use when we look up and dial phone numbers, which is called **short-term memory**. **The limitations on the size of short-term memory for numbers are 7 digits, plus or minus 2, meaning a maximum of 9 digits** may be (but are not necessarily) remembered correctly. This means that those people using phone numbers not regularly called, and thus, not programmed into their phones, would be required to remember 10 digits without an association with region, business versus residence, or cell versus regular phone. This will result in many incorrectly dialed numbers, and be a particular hardship on the more elderly users, those with attentional problems or memory disorders, such as Attention Deficit Hyperactivity Disorder or Alzheimer's disease or the mentally retarded. The direct and obvious consequence of this is that you would be establishing a discriminatory policy against those with certain types of disabilities. And, of course, the number of incorrectly dialed numbers will increase dramatically, which will tie up phone circuits unnecessarily.

I can appreciate your not wanting to require businesses to reprint letterhead and business cards, due to the cost, but the majority of your customers are private individuals and should be given foremost consideration. Most businesses have the capability of programming many more numbers into their phone system, reducing the memory and dialing problems that will occur for private individuals. Therefore, I am proposing an alternative that I have not seen proposed. **I propose that all cellular and mobile phones (existing and future) be changed to a different area code, and the regular (hardwired) phone numbers be left with the 336 area code.** This will cause protest by cellular providers who must reprogram, but this would affect a much smaller portion of businesses than the businesses in the entire 336 area.

If this will not result in enough 336 area code numbers being freed for hardwired customers, **a second possibility would be to leave all business listings as 336 (thus reducing their protests about costs) and assign a new area code to all residential listings, current and future.** Although this places more of the initial burden on residential users, it provides an association with the new area code (residential), making it easier to remember the ten digit phone number. In either of the above proposals, there will be a distinct reason for dialing an area code with a certain type of number (cellular or business), rather than a seemingly random assignment of 10 digits.

I sincerely hope that you will present these concerns at the public hearings and offer these two proposals up for discussion.

Yours truly,

Susan J. Schumacher, Ph.D.

cc. Mr. Robert P. Gruber  
Executive Director-Public Staff  
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*Stahl  
7 Comm  
Nigfall  
PS Comm*