

**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 (NPA)))))	ORDER REQUESTING COMMENTS AND SCHEDULING PUBLIC HEARING
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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 with the Commission an industry recommendation for relieving the 336 numbering plan area (NPA) or area code in North Carolina. The following members of the telecommunications industry in North Carolina participated in the area code relief meeting in Greensboro on July 27, 2000, where the industry reached consensus on its recommendation. 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. Members of the Commission Staff and the Public Staff attended the meeting as observers.

The NANPA's filing states that the 336 area code in North Carolina is projected to exhaust during the fourth quarter of 2002, which has created a need for an additional area code. At the meeting held in Greensboro on July 27 2000, industry participants considered four relief alternatives to furnish relief before exhaust of the 336 NPA. The participants reached consensus to recommend an overlay over the entire 336 geographic area as the most suitable relief plan for the 336 area code. The NANPA states that, in planning for the introduction of a new area code, the NANPA and the industry used the industry NPA Code Relief Planning and Notification Guidelines (Industry Numbering Committee 97-0404-016) (Industry Guidelines). This document can be accessed at the following web site maintained by the Alliance for Telecommunications Industry Solutions (ATIS): www.atis.org/atis/clc/inc/incdocs.htm. The NANPA states that these guidelines assist the NANPA, the industry, and regulatory authorities with assumptions, constraints, and planning principles to be used in area code relief planning efforts.

BACKGROUND

Based upon the projected exhaust date and pursuant to Industry guidelines, NANPA facilitated an Industry meeting in Greensboro, North Carolina on July 27, 2000, to review

and discuss relief alternatives for the 336 NPA Guidelines for the 336 NPA. To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 8, 1999) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>. Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document ("IPD") prior to the relief planning meeting. The IPD set forth four relief proposals for the 336 NPA: an all services distributed overlay — referred to as Alternative #1 in the IPD, a geographic split in which the dividing line encompasses the Winston-Salem, Greensboro, and High Point rate centers, creating a doughnut-shaped geographic area — referred to as Alternative #2; 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 a geographic split with the boundary line following rate center boundaries in a northeastern to southwestern direction placing the High Point rate center on the eastern side of the line and the Summerfield, Monticello, Reidsville, Gatewood, and Ruffin rate centers on the western side — referred to as Alternative #4. No additional alternatives were presented by Industry members. The IPD included NPA maps, descriptions, dialing requirements, and the projected life in years of each relief alternative.

At the meeting, the participants discussed the attributes of the various alternatives for each NPA and reached consensus to recommend Alternative #1, the all-services distributed overlay relief plan, for the 336 NPA. The Industry eliminated from consideration the geographic split alternatives because the dividing line would split at least four counties in each alternative, divide seven-digit local dialing routes, and create a confusing mixture of seven and ten-digit local dialing. There is no assurance that the two resulting NPAs will exhaust at approximately the same time and the percentage of seven-digit dialing would be greatly reduced in some areas. The Industry noted that all three geographic split alternatives have the potential of forcing some customers, who have changed their telephone numbers three times in the previous six years, to do so again. Alternatives #3 and #4 would divide the Triad area of High Point and Greensboro from Winston-Salem, and Alternative #4 would separate the Gatewood and Milton rate centers which are served by the same switch in the Lynchburg, Virginia Local Access and Transport Area ("LATA").

PROPOSED ALL-SERVICES OVERLAY RELIEF PLAN FOR THE 336 NPA

The recommended all-services distributed overlay alternative for the 336 NPA would overlay a new area code over the same geographic area covered by the existing NPA. All existing customers in the 336 NPA would retain their current ten digit telephone numbers. In agreement with Federal Communications Commission regulations, the relief

plan would require ten-digit dialing for calls within and between all area codes in the geographic area covered by the overlay area code. Accordingly, the Industry recommends that seven-digit dialing across NPA boundaries be eliminated and that the Commission require ten-digit dialing for local, extended area service ("EAS") and expanded local calling services ("ELCS") calls placed across NPA boundaries. When the 336 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #1 is nine years.

The Industry recommends that the Commission release an NPA relief order before September 1, 2001. Based upon a relief order released in September 2001, the Industry recommends that the Board adopt a thirteen-month implementation schedule including a four-month network preparation period beginning immediately upon the release of the Commission's relief order. The network preparation period will be followed by a two-month customer education preparation period and then a six-month permissive dialing period during which customers may dial seven or ten digits for local calls placed within the 336 NPA and all cross boundary calls. Mandatory dialing will begin twelve months after the relief order is released. The Industry plans to implement a second phase of customer education one month prior to the commencement of mandatory dialing. Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that comments should be sought from the public on the industry recommendation and any alternative proposals 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 present their views on the matter of area code relief for the 336 area code. Finally, the Commission concludes that comments and reply comments should be sought from interested parties.

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 March 6, 2001. As the local exchange companies with the largest serving areas, BellSouth Telecommunications, Inc. and North State Telephone Company shall assume primary responsibility for assuring, with the cooperation of the other local

exchange companies (LECs) and telephone membership corporations (TMCs), 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. Such notice shall be published in newspapers of general circulation throughout the geographic territory covered by the 336 area code and shall cover not less than 1/4 of a page. Such notice shall be published once a week for two successive weeks concluding by no later than February 27, 2001. Each LEC/TMC which publishes the attached public notice, shall not later than March 6, 2001, file affidavits regarding such newspaper publication and a list papers used for publication and the dates the notice was published in each newspaper.

2. That the LEC shall send the public notice as a bill insert to each of their respective subscribers located within the 336 area code once during the period beginning on the date of this Order and ending on March 9, 2001.

3. That the 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 dates of this Order and ending on March 9, 2001.

4. That the formal parties to this proceeding shall file comments regarding the industry recommendation, or any alternative proposal, not later than February 23, 2001, with reply comments due no later than March 6, 2001. 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 requirement shall apply to any comments or reply 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 area code 336, 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 the boundaries of any area codes 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 which 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 together with an MS-DOS formatted 3.5-inch computer diskette containing noncompressed files saved in WordPerfect format.
- d. Be encouraged to file jointly.

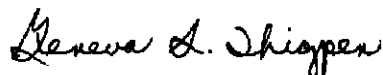
5. That a public hearing shall be convened in the Greensboro, North Carolina, on Tuesday, March 13, 2001 at 7:00 p.m., Auditorium - Guilford County Social Services Building, 301 North Eugene Street, and continuing on Wednesday, March 14, 2001 at 9:00 a.m., at the same location, for the purpose of receiving public comment on the matter of area code relief for the 336 area code. The evening hearing on March 13, 2001 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 13, 2001, will also be allowed to testify on the morning of March 14, 2001. The Commission will receive testimony from all formal parties, including the industry participants, the Public Staff, Attorney General, and any other intervenors, during the hearing. 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, all interexchange carriers, 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 5th day of January, 2001.

NORTH CAROLINA UTILITIES COMMISSION



Geneva S. Thigpen, 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)	NOTICE OF
Plan Area (NPA))	PUBLIC HEARING

NOTICE IS HEREBY GIVEN that on September 7, 2000, the North American Numbering Plan Administration (NANPA) filed with the North Carolina Utilities Commission (Commission) a recommendation made by representatives of the telecommunications industry to provide relief for the 336 area code in North Carolina. The NANPA's filing states that because of increasing demand for telephone numbers, the 336 area code is projected to exhaust or run out of telephone numbers during the fourth quarter of 2002. This has created a need to introduce another area code in the geographic area now covered by the 336 area code to ensure the availability of telephone numbers in the future. The number for the new area code will not be announced until after final approval of a relief plan.

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 their 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 and expanded 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 Communications Commission (FCC) regulation would require ten-digit dialing both between and within the 919 code and the new overlay area code.

OTHER SOLUTIONS WERE CONSIDERED

According to NANPA, the industry examined four alternatives before reaching a unanimous consensus to recommend the "distributed overlay" relief plan. Three variations of a "geographic split" relief plan were also considered. 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 area codes, most of the 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 GREENSBORO

After carefully considering the significant potential impacts associated with the distributed overlay area code relief plan recommended by the North Carolina telecommunications industry, the Commission is determined that all affected subscribers should have an opportunity to express their views on the recommendation. Accordingly, the Commission will conduct a public hearing beginning on Tuesday, March 13, 2001 at 7:00 p.m. in the Auditorium - Guilford County Social Services Building, 301 North Eugene Street, in Greensboro, for the purpose of receiving public comment regarding the addition of a new area code to relieve the current 336 area code. The hearing will continue on Wednesday, March 14, 2001, at 9:00 a.m. at the same location. The evening hearing on Tuesday, March 13, will 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 13 will also be allowed to testify on the morning of March 14. The Commission will receive testimony from all formal parties, including the industry participants, the Public Staff, Attorney General, and any other intervenors, during the January hearing after public witnesses.

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 6, 2001, and should include any information that those persons wish to be considered by the Commission in this matter. Interventions or statements should be 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:

Robert P. Gruber
Executive Director - Public Staff
4326 Mail Service Center
Raleigh, North Carolina 27699-4326
Fax: (919) 733-9565

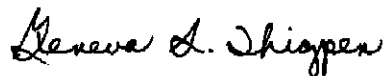
The Attorney General is also authorized by statute to represent the using and consuming public in proceedings before the Commission. Statements to the Attorney General should be addressed to:

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 COMMISSION.

This the 5th day of January, 2001.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in cursive script, reading "Geneva S. Thigpen".

Geneva S. Thigpen, Chief Clerk