

June 10, 2014

VIA ELECTRONIC FILING

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

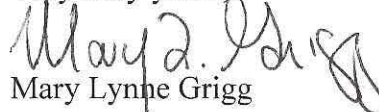
RE: Docket No. P-100, Sub 137C

Dear Mrs. Mount:

Pursuant to the Commission's March 11, 2014 Order Establishing Procedures, Scheduling Hearing and Requesting Comments, attached for filing in the above-referenced docket on behalf of the Joint Telecommunications Carriers¹ are the Joint Comments and Joint Comments Executive Summary.

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

Attachments

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").

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. P-100, SUB 137C

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:
In the Matter of Area Code Relief)
For North Carolina's 336) JOINT COMMENTS
Numbering Plan Area)

COMMENTS OF THE JOINT TELECOMMUNICATIONS CARRIERS

The Joint Telecommunications Carriers,¹ representing a coalition of telecommunication and wireless carriers, submit the following comments in support of the September 7, 2000 and July 22, 2013 filings submitted by Neustar, Inc. ("Neustar"), the North American Numbering Plan Administrator ("NANPA") for the Commission to approve the industry consensus recommendation for an all-services distributed overlay as the preferred form of relief for the impending exhaust of the 336 area code and the industry recommended 13-month implementation schedule.

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").

I. Overview

On July 22, 2013, NANPA submitted a filing to the Commission in which NANPA renewed its request that the Commission approve the industry's consensus decision to recommend an all-services distributed overlay plan as the preferred form of area code relief for the 336 NPA. In its Order Establishing Procedures, Scheduling Hearing and Requesting Comments, issued on March 11, 2014, the Commission established a procedural schedule for written comments and reply comments, and also set this matter for public hearing.

II. The All-Services Overlay Plan Is the Most Equitable Approach to Area Code Relief for the 336 NPA

The Joint Telecommunications Carriers strongly support NANPA's all-services overlay recommendation for the reasons stated in NANPA's September 7, 2000 and July 22, 2013 filings, and those stated herein. Such actions will significantly minimize inconvenience to consumers and support the continuing trend throughout the United States to use the overlay method as the preferred form of area code relief.

As stated in NANPA's filings, the overlay has numerous advantages over an area code split, including less customer impact and fewer technical issues. Moreover, as seen in the recent implementation of overlays in numerous states across the nation, overlays are the least disruptive for consumers and can be effectively and efficiently implemented. As a result, overlays are increasingly common across North America as the preferable form of area code relief.²

² On a national level, 26 overlays have been implemented and only one split (NM 505) since January 1, 2005 – including the 919/984 overlay in North Carolina in 2012. An additional 17 overlays have been implemented in Canada and the Dominican Republic since January 1, 2005, and no other splits in other NANP nations in that timeframe.

Thus, it is not surprising that the North American Numbering Council (“NANC”), an advisory group to the Federal Communications Commission (“FCC”), approved the proposal of its Local Number Portability Administration Working Group (“LNPAWG”) to transmit a recommendation to the FCC to adopt overlays as an industry “Best Practice” at its September 2013 meeting. The FCC subsequently issued a Public Notice in December 2013, requesting comments on the recommendation.³ The LNPAWG Best Practice # 30 detailing the basis of the overlay recommendation is attached hereto as Exhibit A.

A. An Overlay Does Not Create “Winners” and “Losers”

The Commission’s two main choices for area code relief are an overlay or a geographic split. The public interest detriments of an area code split are well-understood, and the 336 NPA is no exception. Unlike an overlay, an area code split would not treat consumers who have a 336 telephone number today in an equitable manner. A split would force customers on the “losing” side of the new NPA boundary to change the area code of their 10-digit phone number, thus requiring them to contact their family, friends and business associates to provide the new area code. An area code split would place potentially onerous financial burdens on business owners and operators in the affected area by requiring them to update their company stationery, business cards, texting information, Internet-related sites, including social media, and advertisements – in addition to contacting existing customers to inform them of a new business phone number. Further, today there are numerous non-telephony databases that use full 10-digit

³ See <http://www.fcc.gov/document/comment-sought-north-american-numbering-council-proposals>.

telephone numbers as a search criterion, such as airlines, doctors, utilities, grocery reward programs, pharmacies, national missing children databases, and others that would need to be updated with a new telephone number if an area code split were chosen. As consumers and businesses alike become increasingly attached to and are identified by their telephone numbers, an area code split is significantly more burdensome than it might have been just 5 or 10 years ago.

B. An Overlay Can Be Easily Implemented and Adapted to by Consumers

The successes experienced with the recent overlay implementations in Kentucky in February 2014 (Area Code 270) and Nevada in May 2014 (Area Code 702) demonstrate that the industry can smoothly implement overlays in an effective and efficient manner that will minimize adverse impact on consumers. Overlays represent a progressive approach to introducing additional numbering resources and are the most prevalent form of area code relief adopted by state commissions across the country since at least 2005. Indeed, other states that have previously only implemented splits have recently implemented or are now implementing overlays, including Indiana, Tennessee and South Carolina.⁴

In earlier years, state commissions expressed concern for the burden and inconvenience to consumers of 10-digit dialing on calls within the same area code. Today, however, the possibility of a telephone number change and the resulting burdens and costs associated with the change far outweigh the burden of 10-digit dialing for many customers. Recent experience shows that consumers easily adapt to making many “local” calls between and within area codes and dialing 10 digits as part of their routine

⁴ The Indiana 812 NPA overlay will be completed in 2014, and the Tennessee 615 NPA overlay and the South Carolina 843 NPA overlay will both start in 2014 and be completed in 2015.

calling patterns. Many work in one area code, live in another and have friends and family in numerous others. Plus, the growing use of wireless devices, and in particular smart phones, as a consumer's primary phone means that "dialing" for many consumers consists of highlighting a contact and choosing the called party's number rather than inputting 10 digits. Thus, the concern that 10-digit dialing will be a burden for consumers when an overlay to the 336 NPA is implemented will have even less validity going forward.⁵

C. An Overlay Avoids Certain Local Number Portability and Other Technical Implementation Problems Associated With a Split

An additional benefit of overlays over splits is that implementation of an overlay avoids technical problems carriers have experienced in complying with customers' local number portability ("LNP") requests. Specifically, there are significant technical challenges to complying with LNP requirements during the permissive dialing period of an area code split. Under relevant federal rules, the Number Portability Administration Center ("NPAC") houses all of the ported and pooled number data. During the night on which permissive dialing is implemented, NPAC personnel must update the NPAC database to include both the old and the new NPA. On the same night, all carriers operating in the NPA must update their operational support systems with the new and old NPA so that port requests will complete within the designated porting intervals. Port requests can fail or create a backlog if the carriers' operational support systems are not in sync with the NPAC's database. If such coordination fails, calls can also be misrouted or

⁵ Once 10-digit dialing becomes the accepted practice in an area, future area code exhaust situations are easily resolved by simply adding another area code overlay into the mix. In contrast, the negative consequences of splitting an area code will recur in the future, potentially requiring some percentage of the same consumers and business customers to incur the same costs and headaches to resolve the next number exhaust situation affecting the same area.

denied, leading to consumer dissatisfaction and undermining the unquestionable competitive and consumer benefits of LNP.

Also, when implementing a split, all carriers, nationwide, on the night that permissive dialing is implemented, must activate the new NPA in order for calls to complete to both the 336 NPA and the new NPA.

In addition, many carriers have implemented newer network routing technologies such as Voice over Internet Protocol ("VoIP"). These technologies would require significant and costly operational developments to accommodate an NPA split versus an overlay solution because the VoIP call routing platforms are centralized on a national basis rather than a local switching basis as with the traditional Time Division Multiplexing ("TDM") network.

Finally, there are a number of other technical implementation problems that can arise for wireless customers when an area code split is implemented. These include, but are not limited to:

- **Caller ID Customer Confusion** – During the permissive dialing period, the called party's Caller ID device or handset may indicate that a received call originates from a number with the new area code even though the caller is still using a number in the old area code. Although this issue does not technically affect the ability of the call to complete, it can lead to confusion on the called party's part. The called party may choose not to answer the call because the indicated originating number or the new area code is not recognized, or the stored contact list in the called party's device or handset has not been updated. There is no such problem with an overlay because no customer is forced to change his or her number.
- **Text and Multi-Media Messaging Completion** – Some wireless systems currently are able to handle only one 10-digit telephone number for text and multi-media (e.g., picture) messaging. Therefore, if during the permissive dialing period the calling party inputs a different 10-digit number (i.e., using the new area code) than the one which is in the called party's wireless provider's system (i.e., the old area code number), the message will fail and not be delivered.

- **Smart Phone Applications Impacts** – With the growing proliferation of smart phones, wireless customers have the ability to add various types of third-party applications to their phones without the approval or even the knowledge of their wireless service providers. These applications, which can run into the hundreds or even thousands depending upon the smart phone's storage capacity, are routinely identified by the customer's existing 10-digit number. As a result, changing a customer's area code in a split would likely impact the operation of many of these advanced data applications, causing customer confusion and generating complaints.
- **Wireless Phone Reprogramming Issues** – When implementing a split, most wireless providers will change the area code of affected customers' phones over-the-air, if the handset is over-the-air capable, to avoid manually reprogramming each handset. But where customers with handsets that are not over-the-air capable do not bring their handsets in to the provider for manual reprogramming, or are military personnel or other customers living abroad whose phones are outside the range of over-the-air reprogramming, these customers' new area code will not get timely programmed before mandatory dialing begins. As a result, they will not be able to receive calls because their old area code 10-digit number in their phones will not match the new area code number that is in the service provider's customer record.
- **Administrative Number Impacts** – Most wireless carriers have various administrative numbers in their networks, and those numbers can be affected by a split as well. For example, temporary local directory numbers ("TLDNs") in a network are used to facilitate the delivery of calls to customers that are roaming on that network. If TLDNs are in central office codes where area codes have changed, then wireless carriers have to take great care in changing those numbers during the permissive dialing period of the split to avoid negatively impacting call completion for those roaming customers. Carriers have to do extensive testing before the start of permissive dialing and again before mandatory dialing in a split to ensure that changing the area code of any administrative number in the network will not negatively impact a customer's ability to receive calls. There are no such concerns with an overlay because none of the existing administrative numbers would need to change. Additionally, the SMS 800 Data Base, which houses all of the underlying 10-digit geographic routing numbers for toll free numbers, would need to be changed for all numbers affected by an area code split.

III. The Joint Telecommunications Carriers Support a Slightly Modified 13-Month Implementation Schedule

In its September 7, 2000 Petition, NANPA outlined a 13-month schedule for implementation of the recommended all-services overlay, with implementation beginning immediately upon the issuance of a Commission Order. Under that schedule, the first

four months are dedicated to network preparation, followed by two months of customer education preparation, and then six months of permissive 7- or 10-digit dialing. Mandatory 10-digit dialing would begin 12 months after the issuance of the Commission Order, and a second round of customer education would occur one month prior to the start of mandatory 10-digit dialing.

Since September 2000, the Joint Telecommunications Carriers have implemented numerous overlays across the country, and have recognized that a bit of flexibility is most helpful in establishing the general 13-month implementation schedule. The Joint Telecommunications Carriers therefore propose a slightly modified implementation schedule:

After the Commission issues the Order approving the all-services overlay, the NANPA would host the initial implementation meeting with the industry to determine the specific dates for the 13-month implementation schedule. The industry would ensure that key dates fall on a Saturday and do not coincide with key dates of other overlay implementations occurring across the country or significant holidays where call volumes may spike, such as Mother's Day. Under the modified 13-month schedule, the first six months would be dedicated to customer education and network preparation, followed by six months of permissive 7- or 10-digit dialing and continued customer education. After the first 12 months, mandatory 10-digit dialing would begin and the first code activation from the new NPA would become effective after one month of mandatory 10-digit dialing. Based on the industry's experience with overlay implementations across the country, this 13-month period should provide adequate time for preparation and customer

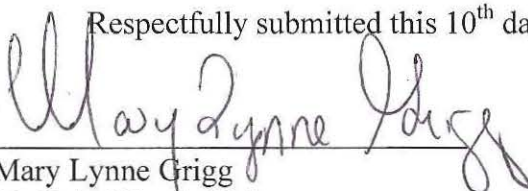
education, leading to a smooth implementation of the overlay and avoiding the denial or delay of service to customers due to the unavailability of new central office codes.

In addition, in NANPA's original September 7, 2000 Petition in this docket, the industry also recommended (at p. 4) 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." The Joint Telecommunications Carriers renew this recommendation and urge the Commission to include such a requirement in its final Order in this proceeding.

IV. Conclusion

For the foregoing reasons and those set forth in NANPA's September 7, 2000 and July 22, 2013 filings, and consistent with the NANC recommendation to the FCC to adopt overlays as an industry Best Practice, the Joint Telecommunications Carriers urge the Commission to adopt the all-services overlay and the modified 13-month implementation schedule as outlined in these comments. By doing so, the Commission will implement area code relief for the 336 NPA with the least inconvenience possible to existing customers and will help avoid denial of service to new customers of certain telecommunications providers prior to the anticipated exhaust of the 336 NPA.

Respectfully submitted this 10th day of June, 2014,



Mary Lynne Grigg
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
PO Box 27507 (27611)
Raleigh, NC 27601
(919) 755-6573 (Direct)
mgrigg@mcguirewoods.com
Counsel for Sprint

John Tyler
General Attorney – North Carolina
AT&T North Carolina
150 Fayetteville Street, Suite 800
Raleigh, NC 27601
(919) 835-1543
John.tyler@att.com
Counsel for AT&T

Daniel C. Higgins
Burns, Day & Presnell, P.A.
PO Box 10867
Raleigh, NC 27605
(919) 782-1441
dhiggins@bdppa.com

Counsel for North State
Counsel for Randolph Telephone
Counsel for Windstream

Robert W. Kaylor
Law Office of Robert W. Kaylor, P.A.
353 East Six Forks Road, Suite 260
Raleigh, NC 27609
(919) 828-5250
bkaylor@rwkaylorlaw.com

Counsel for Verizon

Teri Y. Ohta
Principal Corporate Counsel, State
Regulatory Affairs
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
(425) 383-5532 (Desk)
(425) 444-7011 (Mobile)
Teri.Ohta@t-mobile.com

Counsel for T-Mobile

Jeanne W. Stockman
CenturyLink
14111 Capital Boulevard
Wake Forest, NC 27587
(919) 554-7621
Jeanne.w.stockman@centurylink.com

Counsel for CenturyLink

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. P-100, SUB 137C

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:		
In the Matter of Area Code Relief)	
For North Carolina's 336)	JOINT COMMENTS
Numbering Plan Area)	EXECUTIVE SUMMARY

**EXECUTIVE SUMMARY OF THE JOINT TELECOMMUNICATIONS
CARRIERS**

The Joint Telecommunications Carriers'¹ comments support the September 7, 2000 and July 22, 2013 filings submitted by Neustar, Inc. ("Neustar"), the North American Numbering Plan Administrator ("NANPA"). Specifically, the Joint Telecommunications Carriers advocate NANPA's all-services overlay recommendation as the most equitable and most workable approach to area code relief for the 336 numbering plan area ("NPA"). An all-services overlay will significantly minimize inconvenience to consumers and comport with the continuing trend throughout the United States to use the overlay method as the preferred form of area code relief. The

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overlay has numerous advantages over an area code split (the other alternative for area code relief), including less customer impact and fewer technical issues.

Unlike the overlay solution supported by the Joint Telecommunications Carriers, an area code split would treat consumers who have a 336 telephone number today in an inequitable manner. A split would force some customers to change the area code of their 10-digit phone number, thus requiring them to contact their family, friends and business associates to provide the new area code. Further, an area code split would place potentially onerous financial burdens on business owners and operators. As consumers and businesses alike become increasingly attached to and are identified by their telephone numbers, an area code split is significantly more burdensome than it might have been just five or ten years ago. Recent experience also shows that consumers easily adapt to 10-digit dialing on calls within the same area code as part of their routine calling patterns.

The Joint Telecommunication Carriers' comments set forth an additional benefit of overlays over splits, which is that the technical problems that carriers experience in complying with customers' local number portability requests are avoided, as well as other technical problems such as caller ID customer confusion, text and multi-media messaging completion, smart phone applications impacts, wireless phone reprogramming issues, and administrative number impacts.

While the Joint Telecommunication Carriers generally support NANPA's proposed implementation schedule, they do recommend some slight modifications. In its September 7, 2000 filing, NANPA outlined a 13-month schedule for implementation of the recommended all-services overlay, with implementation beginning immediately upon the issuance of a Commission Order. Since then, the Joint Telecommunications Carriers

have implemented numerous overlays across the country and have recognized that a certain flexibility is helpful in establishing the general 13-month implementation schedule. Therefore, the Joint Telecommunication Carriers propose to modify the schedule to provide for an initial six-month period that would be dedicated to customer education and network preparation, followed by six months of permissive 7- or 10-digit dialing and continued customer education. After the first 12 months, mandatory 10-digit dialing would begin and the first code activation from the new NPA would become effective after one month of mandatory 10-digit dialing. Based on the industry's experience with overlay implementations across the country, this modified schedule should provide adequate time for network preparation and customer education, leading to a smooth implementation of the overlay and avoiding the denial or delay of service to customers due to the unavailability of new central office codes.

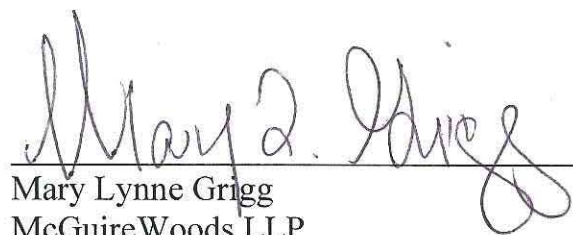
The Joint Telecommunication Carriers additionally renew their recommendation from NANPA's September 7, 2000 filing that "seven-digit dialing across NPA boundaries be eliminated and that the Commission require ten-digit dialing for local, extended area service ("EAS") and expanded local calling services ("ELCS") calls placed across NPA boundaries."

The Joint Telecommunications Carriers respectfully request that the Commission adopt the all-services overlay and the modified 13-month implementation schedule as set forth in their comments. By doing so, the Commission will implement area code relief for the 336 NPA with the least inconvenience possible to existing customers.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Joint Comments and Joint Comments Executive Summary, as filed today in Docket No. P-100, Sub 137C, has been served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 10th day of June, 2014.

A handwritten signature in dark ink, appearing to read "Mary L. Grigg", written over a horizontal line.

Mary Lynne Grigg
McGuire Woods LLP
434 Fayetteville Street, Suite 2600
P.O. Box 27507 (27611)
Raleigh, NC 27601
(919) 755-6573 (Direct)
mgrigg@mcguirewoods.com

Counsel for Sprint