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Jan 28 2014

January 28, 2014

Ms. Gail Mount, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4325

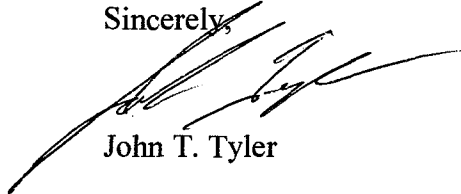
RE: Area Code Relief for North Carolina's 336 Numbering Plan Area  
Docket No. P-100 Sub 137C

Dear Ms. Mount:

Enclosed is AT&T North Carolina's Motion for Extension of Time In Order  
Requesting Comments and Scheduling Public Hearings in the above-referenced matter.

Thank you for your assistance in this matter.

Sincerely,



John T. Tyler

JTT/nml

Enclosure  
1098699

**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

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)

**MOTION FOR EXTENSION OF TIME IN ORDER REQUESTING COMMENTS AND  
SCHEDULING PUBLIC HEARINGS**

AT&T<sup>1</sup> submits the following Motion For Extension of Time in Order Requesting Comments and Scheduling Public Hearings. As explained below, AT&T (and possibly other carriers) cannot issue the customer notifications required by the Order quickly enough for them to reach customers in time to provide them a meaningful opportunity to participate in public comment cycle established in the Order. Accordingly, AT&T respectfully request that the Commission enter an order extending the current customer notice requirements, public notice, and hearing date by no less than 60 days.

**INTRODUCTION**

On January 21, 2014, the Commission issued an Order Requesting Comments and Scheduling Public Hearings to address area code relief for the geographic area covered by the 336 NPA. The Commission ordered that members of the general public shall have the opportunity to file comments by no later than February 28, 2014 and that 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,

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<sup>1</sup> BellSouth Telecommunications, LLC d/b/a AT&T North Carolina

2014. The Commission further ordered that LECs and CLPs shall send the public notice as a bill insert, via US Mail or electronically, to their respective subscribers within the 336 area code once during the period beginning on the date of the Order and ending on February 28, 2014 and encouraged the telephone membership corporations (TMCs) to also notify their customers. Finally, the Commission ordered AT&T, and North State Telephone Company to assume primary responsibility for assuring, with the cooperation of the other local exchange companies, competitive providers and TMCs, the publication of the public notice in newspapers of general circulation throughout the affected area.<sup>2</sup>

### **BASIS FOR EXTENSION**

To comply with the Commission's Order, AT&T would need to draft, print, and begin including inserts in affected bills no later than the first of February, which is only nine (9) business days after the Order was issued. Even then, depending on where they fall within the billing cycle, AT&T's customers would receive little to no notice of their opportunity to participate in the public comment cycle established by the Commission. AT&T understands that other carriers who serve customers in the 336 NPA have similar issues.

In order to ensure proper notice to all customers, therefore, AT&T requests no less than a 60 day extension of the customer notice requirements, public notice and hearing date. This will give the affected companies sufficient time to properly notice customers and to coordinate the publication of the notice in newspapers of general circulation throughout the geographical area covered by the 336 NPA.

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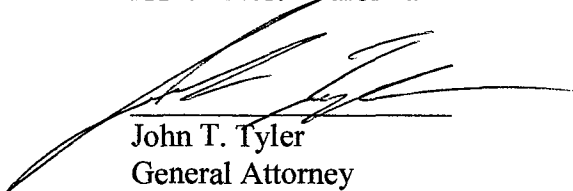
<sup>2</sup> Although the Commission has ordered that AT&T and North State Telephone Company assume primary responsibility for assuring publication of public notice throughout the entire affected geographical area, AT&T has no legal authority to require other carriers to comply with the Commission's Order. Accordingly, AT&T respectfully suggests that the Commission order all affected carriers to work with the North American Numbering Plan Administrator and the Commission Staff to create an implement a plan to address these issues.

### CONCLUSION

For the foregoing reasons, AT&T respectfully requests the Commission promptly enter an order extending the current customer notice requirements, public notice and hearing date by no less than 60 days.

Respectfully submitted this 28th day of January, 2014.

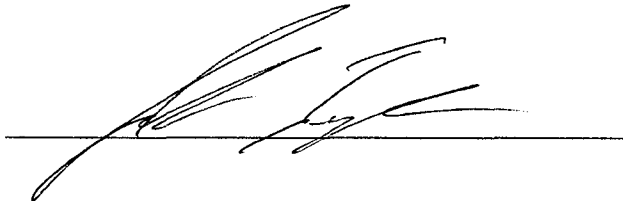
AT&T North Carolina

A handwritten signature in black ink, appearing to read "John T. Tyler", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on all parties of record on this 28th day of January 2014.

A handwritten signature in black ink, consisting of several fluid, overlapping strokes, is written over a horizontal line.

1098701