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**JAN 25 2001**

Clerk's Office  
N.C. Utilities Commission

**NORTH CAROLINA  
PUBLIC STAFF  
UTILITIES COMMISSION**

January 25, 2001

**NX-01-CAC336-415**

Ms. Judy Mendenhall, President  
Mr. Jeff Horney, Chairman  
High Point Chamber of Commerce  
1101 North Main Street  
Post Office Box 5025  
High Point, North Carolina 27262-5025

*100508 137 C*

Dear Ms. Mendenhall and Mr. Jeff Horney:

This is in reference to your recent letter regarding the North Carolina Utilities Commission's proposals to provide area code relief in the 336 area code. In your letter, you state that the Chamber is in favor of the overlay proposal. Mr. Robert Gruber, Executive Director of the Public Staff - North Carolina Utilities Commission, has asked me to respond on his behalf.

The issues involved in this matter are very complex, and any decision the Utilities Commission makes will be controversial. As you know, the two options available to provide area code relief are the overlay and the geographic split. There are several advantages and disadvantages associated with each option that impact various customer groups in different ways.

With an overlay option, existing customers experience no number change since they will retain the same area code currently affiliated with their telephone numbers. However, all local calls (basic local and expanded local) will have to be dialed using ten digits (area code + 7 digit telephone number) instead of the traditional seven digits. This dialing pattern is a requirement set out by the Federal Communications Commission (FCC). Customers need not dial a 1 or 0 before the ten-digit number. Also, ten-digit dialing under the overlay will not result in any change in the type of call or rates associated with the same calls previously dialed using seven digits.

With a geographic split option, approximately one-half of the existing customers in the 919 area code would be assigned a new area code. While all calls made within the geographic area of each of the remaining 919 area code and the new area code would be dialed using seven digits, all local calls made going between the two area codes would require ten-digit dialing. Due to the extensive amount of seven-digit dialed local calling in the 919 area today, many of those routes would convert to ten-digit dialing as the result of implementing a geographic split. This difference in dialing patterns could potentially lead to customer confusion of having to decide when to dial seven or ten digits when making local calls within the geographic area previously covered by only the 919 area code.

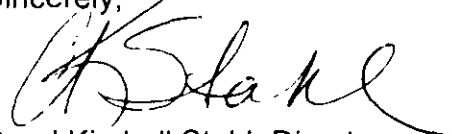
Executive Director 733-2435	Communications 733-2810	Economic Research 733-2902	Legal 733-6110	Transportation 733-7766
Accounting 733-4279	Consumer Services 733-9277	Electric 733-2267	Natural Gas 733-4326	Water 733-5610

As you note in your letter, business customers that would be assigned a new area code under a geographic split generally prefer an overlay to avoid printing and advertising expense associated with changing their area code. Also, wireless or cellular providers generally prefer an overlay to avoid the expense of having to reprogram cellular phones for those customers affected by an area code change. The consensus of the residential customers which the Commission has heard from in the other area code relief dockets is a preference for a geographic split as opposed to having to dial all local calls using ten digits under an overlay.

You may wish to make your members aware that there is a public hearing to be held on this matter in Greensboro on Tuesday, March 13, at 7:00 p.m. in the Auditorium of the Guilford County Social Services Building, 301 N. Eugene Street. People who cannot attend that hearing may speak at the beginning of the continuation of the hearing to be held on Wednesday morning at 9:00 a.m. at the same site. Notices will be appearing in local newspapers by February 27, and there will be bill inserts from the effected local exchange carriers.

We appreciate your taking the time to contact our offices. I am providing copies of your letter to the Public Staff's Legal and Communications Division for consideration in our preparation for this case. The original has been given to the Chief Clerk of the Commission for inclusion in the official file.

Sincerely,



Carol Kimball Stahl, Director  
Consumer Services Division

CS/

cc: ✓ Chief Clerk's Office – Docket P-100, Sub 137c  
(w/ original letter)

Public Staff – Communications Division  
(w/ copy of letter)

Public Staff – Legal Division  
(w/ copy of letter)

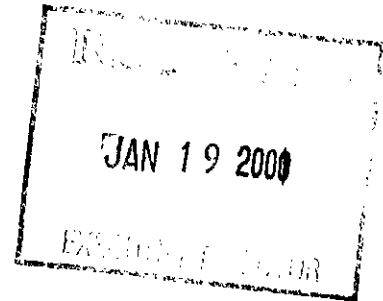
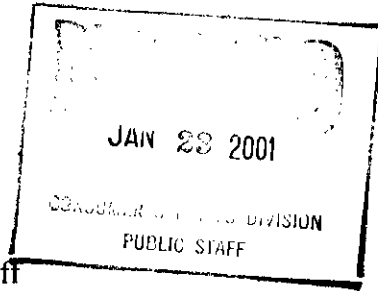


# HIGH POINT

## CHAMBER OF COMMERCE

January 17, 2001

Mr. Robert P. Gruber  
Executive Director – Public Staff  
4326 Mail Service Center  
Raleigh, NC 27699



Dear Mr. Gruber:

In 1997 the Triad Region was assigned the area code of 336 due to the increased demand for new numbers. With the growth in the area, the supply of numbers in the 336 area code will be exhausted by the fourth quarter of 2002. We feel a new area code would create a tremendous burden on businesses who have would have to make changes in their letterhead, advertisements, signage, bills, invoices, etc.

The High Point Chamber of Commerce is in support of the "overlay" solution. With the overlay method, existing telephone subscribers would not have to change to a new area code. An additional area code would be assigned to the present geographic area of 336 to be used for expansion of services once the 336 numbers are exhausted. We feel this would be the most efficient method for the business community.

Thank you for your consideration.

Jeff Horney, Chairman  
Board of Directors

Sincerely,

Judy Mendenhall, President