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September 21, 2015

VIA OVERNIGHT DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

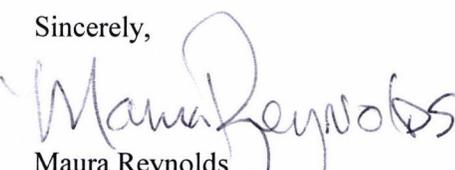
RE: Docket No. GNR-T-15-06
Joint Telecommunications Carriers' Comments

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of the Joint Telecommunications Carriers' Comments in the above-referenced docket.

If you have any questions, please feel free to contact me. Thank you.

Sincerely,


Maura Reynolds

/mer

Enclosures

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

<p>IN THE MATTER OF THE APPLICATION OF NEUSTAR, INC., ON BEHALF OF THE IDAHO TELECOMMUNICATIONS INDUSTRY, FOR APPROVAL OF NUMBERING PLAN AREA RELIEF FOR THE 208 AREA CODE</p>	<p>Case No. GNR-T-15-06</p> <p>Joint Telecommunications Carriers Comments</p>
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COMMENTS OF THE JOINT TELECOMMUNICATIONS CARRIERS

The Joint Telecommunications Carriers,¹ representing a coalition of telecommunications carriers, submit the following comments in support of the application filed by Neustar, Inc. (“Neustar”), the North American Numbering Plan Administrator (“NANPA”) with the Idaho Public Utilities Commission (“Commission”) seeking approval of the industry consensus recommendation for an all-services distributed overlay as the preferred form of relief for the impending exhaust of the 208 area code, and the industry recommended implementation schedule.

¹ The telecommunications carriers collectively referred to herein as the “Joint Telecommunications Carriers” are: AT&T Corp., Teleport Communications America, LLC, SBC Long Distance, LLC, Cricket Communications, LLC, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, Frontier Communications Northwest Inc., Citizens Telecommunications Company of Idaho, Qwest Corporation d/b/a CenturyLink QC, CenturyTel of Idaho, Inc. d/b/a CenturyLink, and CenturyTel of the Gem State, Inc. d/b/a CenturyLink, CenturyLink Communications, LLC, Verizon Wireless, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services, Time Warner Cable Information Services (Idaho), LLC d/b/a Time Warner Cable, Sprint Spectrum L.P., T-Mobile West LLC, XO Communications Services, LLC.

I. Overview

On July 21, 2015, the NANPA filed an application² with the Commission seeking approval of the industry's consensus recommendation for an all-services distributed overlay plan as the preferred form of area code relief for the 208 area code. On August 6, 2015, the Commission issued a Notice of Application, Notice of Modified Procedure,³ providing the opportunity for interested parties to file comments within 60 days of the August 6, 2015 Commission order date.

II. The All-Services Overlay Plan is The Best and Most Equitable Approach

The Joint Telecommunications Carriers strongly support NANPA's overlay recommendation as stated in the NANPA's July 21, 2015 application. An overlay 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.

An overlay is the most equitable and least disruptive method of relief because it does not require any telephone number changes, which is particularly important to business concerns. An overlay has significantly fewer technical implementation issues than a split, and can be effectively and efficiently implemented. The Joint Telecommunications Carriers' collective experience attests to the fact that when an

² July 21, 2015, NANPA application, <http://www.puc.idaho.gov/fileroom/cases/summary/GNRT1506.html>

³ August 6, 2015 Commission Order No. 33355, <http://www.puc.idaho.gov/fileroom/cases/summary/GNRT1506.html>

overlay is implemented, most consumers view the required 10-digit dialing⁴ for all local calls⁵ as a minor inconvenience to which they easily adapt. The overlay has been the preferred and selected method for area code relief over the last 10 years, with 38 of the last 39 area code relief decisions and/or implementations in the United States being overlays.⁶ (See Exhibit A.) The industry has become very skilled at educating consumers and businesses to dial 10-digits for local calls, and customers have ultimately been satisfied with the overlay method.⁷ In 2013, the North American Numbering Council's ("NANC") Local Number Portability Administration ("LNPA") working group issued its recommended "best practices," which supports an overlay as the best solution for area code relief. (See Exhibit B.)

III. There Are No Losers With An Overlay

The Commission has two primary choices for area code relief, an overlay or an area code split. The detriment to the public interest, consumers and businesses are well known with an area code split, and the Idaho 208 area code is no exception. Unlike an overlay, an area code split would not treat consumers who have the 208 telephone number today in an equitable manner. A split would force the Commission to make a difficult decision: to determine the geography pursuant to which all customers in that area

⁴ 47 CFR §52.19 (c)(3)(ii).

⁵ An Overlay does not change the existing local calling areas.

⁶ On a national level since 2005, there have been 32 overlays and only 1 split implemented (the split occurred in New Mexico in 2007), another 6 overlays are scheduled to be implemented by the end of the first quarter of 2017.

⁷ The industry helps to educate its customers and consumers about an area code overlay, which includes a permissive dialing period where callers can get used to dialing 10 digits for local calls prior to the implementation of the overlay. During the permissive dialing period, callers may complete calls with either 7- or 10-digits. When mandatory 10-digit dialing is implemented, callers attempting a 7-digit local call will receive a recording advising them to hang up and dial 10 digits.

would be forced to change their telephone numbers to reflect the new area code.⁸ The consumers and businesses on the losing side of the split would have to change their numbers and they would be faced with numerous adverse impacts related to the number change. For example, those consumers on the losing side would be required to notify family, friends, business associates, doctors, dentists, schools and others who call or text them that the area code portion of their telephone number has changed. Business owners and operators would be required to update their company stationery, business cards, texting information, internet-related sites, social media, and advertisements – in addition to contacting existing customers to inform them of a new area code for their business phone number. This can have a significant negative economic impact on businesses which will not happen with an overlay. These concerns were key factors that persuaded the West Virginia Commission to reverse its order from a split to an overlay in 2008.⁹ At the time West Virginia determined to reverse course from a split to an overlay, it was a single area code state like Idaho.

Additionally, there are numerous non-telephony databases that use full 10-digit telephone numbers as the search criterion, such as databases for airlines, doctors, utilities,

⁸ Initially some consumers support a split because they assume the other side of the split will be required to do the number changes. However, if they understand that they may be required to change their number and accept the burden of notifying everyone they know of their new number, many then support an overlay because they do not want the unnecessary aggravation of a number change. Additionally those who support a split, often do so because they want to retain the ability to dial 7- digits for local calls. However, with the proposed split option in Idaho, some areas will need to dial 7-digits for some local calls and 10-digits for other local calls, because the local calling area in which they reside would be split between the two area codes

⁹ West Virginia PSC (Case No. 00-0953-T-PC), February 13, 2008, Order Granting Petition for Reconsideration and Ordering an Overlay for the 304 Area Code (“the Commission was persuaded by two key themes that were repeated in the requests to reconsider the Order: (i) the geographic split would have imposed a disproportionate economic burden on that portion of the state being required to switch to the new area code and (ii) those individuals and businesses familiar with the ten-digit dialing requirements imposed by other overlay plans in adjoining or other states indicated that the current technology and programming of phones and cellular phones alleviated most of the problems that formerly existed with ten-digit dialing and that ten-digit dialing becomes second nature within a short period of time.”)

grocery reward programs and frequent shopper programs, pharmacies, national missing children databases, and many others. Each of these would need to be updated with the new area code for the telephone number should they be in the area designated to be assigned the new area code if a split were chosen. Since consumers and businesses have become increasingly attached to and are identified by their telephone numbers, a split with the required area code number change would be significantly more burdensome than it might have been 10 years ago.

If the Commission were to select a split, about one-half of the consumers and businesses¹⁰ in Idaho would have to suffer the cost and inconvenience of changing the area code of their telephone numbers.

IV. Consumers Easily Adapt To An Overlay

In earlier years, some state commissions may have expressed concerns about the inconvenience of consumers having to dial 10-digits for local calls within the same area code. However, state commissions and consumers alike have since realized that the possibility of an area code change and the resulting burdens and costs associated with that change far outweigh the inconvenience of 10-digit dialing. For example, in 2008, the California Public Utilities Commission, which had originally selected a split for the 760 area code, changed its decision and ordered an overlay because a vast majority of customers did not want to change the area code of their telephone number.¹¹

¹⁰ The Idaho PUC has received comments from some individuals recommending a split. Many of these comments recommend a split that would not be balanced, such as a split with the time zone boundary as the split boundary. An imbalanced split is inconsistent with the industry guidelines requirements for area code relief and will not be permissible (See section 5.0 of the ATIS NPA Relief Planning and Notification Guidelines at <https://www.atis.org/docstore/product.aspx?id=27888>).

¹¹ Decision Granting Petition for Modification of Decision 08-04-058 and Ordering an Overlay for the 760 Area Code, *Application of the North American Numbering Plan Administrator, on behalf of the California*

Recent experience shows that consumers easily adapt to making “local” calls by dialing 10 digits as part of their routine calling patterns. 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 dialing 10 digits. Thus, the concern that dialing 10 digits will be a burden for consumers when an overlay is implemented will have even less validity going forward.¹²

V. An Overlay Can Be More Easily Implemented and Avoids the Technical Problems Associated With a Split

An additional benefit of an overlay is that implementation avoids technical problems carriers could experience in complying with customers’ local number portability (“LNP”) requests. These technical problems proved to be a significant issue with the split in New Mexico that was completed in 2007.

Specifically, there are significant technical LNP challenges during the permissive dialing period of an area code split.¹³ Under 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

Telecommunications Industry for Relief of the 760 Numbering Plan Area, Application 07-06-018, California PUC (Oct. 21, 2008), slip op. p. 4 (“The extensive public response to our decision focused on the inconvenience and expense of changing telephone numbers, as compared to the relatively minor burden of 10-digit dialing. Customers explained in great detail the expenses that will be incurred by businesses, the lost contacts for individuals, and the use of “speed dial” features on modern telephones that can offset the impact of 10-digit dialing. [¶] We have considered the volume and substance of these comments and have determined that we should grant the petition for modification and adopt a geographic overlay. This will allow customers to retain their existing telephone numbers, which we understand to be the highest priority for customers.”).

¹² Moreover, 10 digit dialing is a necessary precursor to a transition to all Internet Protocol (IP) networks.

¹³ During the permissive dialing period, in an area code split, a customer can be contacted through either the old or the new area code used with their telephone number.

update the NPAC database to include both the old and new area code. On the same night, all carriers operating in the area code must update their operational support systems (“OSS”) with the new and the old area code so that port requests will complete within the designated porting intervals. Port requests can fail or create a backlog if the carriers’ OSS is not in sync with the NPAC’s database. If such coordination fails, calls can also be misrouted or denied, leading to consumer dissatisfaction and undermining the competitive and consumer benefits of LNP.¹⁴

Also, when implementing a split, all carriers, nationwide, on the night that permissive dialing is implemented, must activate the new area code in order for calls to complete to both the existing 208 area code and the new area code.

In addition, many carriers have implemented newer network routing technologies such as Voice over Internet Protocol (“VoIP”). These technologies would require significant operational developments and coordination to accommodate an NPA split. Many VoIP call routing platforms routinely operate on a 10-digit basis already, and the industry is moving toward these new technologies in increasing numbers as traditional telephone networks¹⁵ are retired and replaced. 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

¹⁴ See Exhibit A – From 2005 to the present day, 38 of the last 39 area code relief decisions and/or implementations in the United States have been overlays. Since the New Mexico split in 2007, carriers have not had to do the difficult OSS coordination with the NPAC database related to a split. New carriers since 2007 have never been through a split and do not have the experience of coordinating their OSS with the NPAC database for a split. This could be a very significant issue with a split.

¹⁵ Time Division Multiplexing (“TDM”) Network Technology.

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 customers are forced to change their numbers.

- **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. These applications, which can run into the hundreds or even thousands depending upon the smart phone's storage capacity, often perform various user authentications via a text message sent to the customer's existing 10-digit number. As a result, changing a customer's area code in a split would likely impact the customer's ability to receive such text messages, and the operation of many of these advanced data applications. At the very least, a split will require a customer to update his/her number in his/her user profile in each

application that uses the customer's number as an identifier or authentication criterion.¹⁶

- **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.¹⁷ But when customers with handsets that are not over-the-air capable do not bring their handsets in to the provider for manual programming, 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 be re-programmed before mandatory dialing begins. As a result, they will not be able to receive calls because their handsets will still have the old area code as part of their 10-digit telephone number and calls made to the new area code will not get to them.
- **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 who are roaming on that network. If TLDNs are in central office codes where the area codes has 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

¹⁶ Customers may not immediately know which applications use their phone numbers so some updates could be inadvertently missed.

¹⁷ Over-the-air capable handsets can be remotely reprogrammed by the wireless provider with the new telephone number and the activity does not require interaction with the customer, if the customer is being served by the wireless provider's network at the time the over-the-air reprogramming is initiated. If a customer is roaming on another network, the reprogramming may fail.

completion for 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 Database, 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.

VI. Conclusion

For the forgoing reasons and consistent with the NANPA's July 21, 2015 application, the Joint Telecommunications Carriers respectfully request that the Commission adopt an all-services overlay and the recommended implementation schedule. By doing so, the Commission will implement area code relief in a manner that limits customer inconvenience and other negative impacts on existing consumers and businesses.

Submitted this 18th day of September, 2015.

Respectfully submitted,



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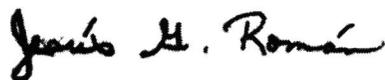
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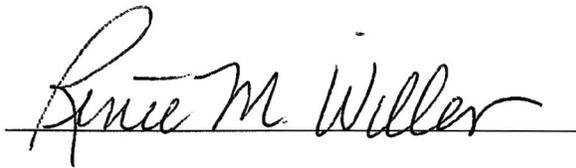
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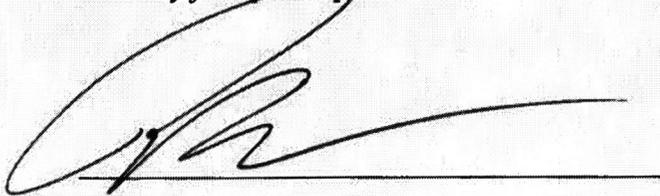
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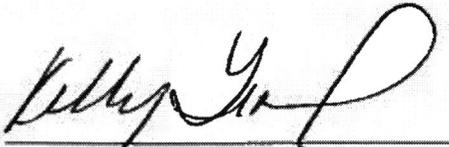
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Exhibit A - Joint Telecommunication Carriers Comments

Case No. GNR-T-15-03

September 18, 2015

Method of Area Code Relief in the United States Since 2005

In Service Dt	Location	New NPA	Overlay?	Old NPA	NPA Complex
3/11/2017	NY	680	Yes	315	315/680
10/17/2016	IN	463	Yes	317	317/463
7/16/2016	NY	934	Yes	631	631/934
5/23/2016	NC	743	Yes	336	336/743
2/27/2016	OH	380	Yes	614	380/614
10/19/2015	SC	854	Yes	843	843/854
4/22/2015	OH	220	Yes	740	220/740
3/28/2015	TN	629	Yes	615	615/629
3/21/2015	CA	628	Yes	415	415/628
3/7/2015	IN	930	Yes	812	812/930
8/30/2014	CT	959	Yes	860	860/959
7/1/2014	TX	346	Yes	832	281/346/713/832
6/3/2014	NV	725	Yes	702	702/725
3/3/2014	KY	364	Yes	270	270/364
10/21/2013	PA	272	Yes	570	272/570
7/1/2013	TX	737	Yes	512	512/737
11/20/2012	CA	669	Yes	408	408/669
4/30/2012	NC	984	Yes	919	919/984
3/24/2012	MD	667	Yes	443	410/443/667
4/16/2011	NY	929	Yes	347	347/718/917/929
4/1/2011	OK	539	Yes	918	539/918
3/26/2011	NE	531	Yes	402	402/531
8/14/2010	WI	534	Yes	715	534/715
7/10/2010	AL	938	Yes	256	256/938
2/26/2010	GA	470	Yes	678	404/470/678/770
2/10/2010	OR	458	Yes	541	458/541
12/12/2009	CT	475	Yes	203	203/475
11/21/2009	CA	442	Yes	760	442/760
11/7/2009	IL	872	Yes	312	312/773/872
5/18/2009	CA	747	Yes	818	747/818
3/29/2009	UT	385	Yes	801	385/801
3/28/2009	WV	681	Yes	304	304/681
9/23/2008	CA	657	Yes	714	657/714
10/7/2007	IL	331	Yes	630	331/630
10/7/2007	NM	575	No	505	
3/17/2007	IL	779	Yes	815	779/815
8/26/2006	CA	424	Yes	310	310/424
5/16/2006	GA	762	Yes	706	706/762
3/14/2005	MS	769	Yes	601	601/769

Exhibit based upon information located at the NANPA website:

<http://www.nationalnanpa.com/enas/npaSince1995Report.do>

NANC LNPA Best Practices - Sept 18, 2013 NANC Meeting

Website Link: <http://www.nanc-chair.org/docs/documents16-2013.html>

The All Services Overlay is the Best Solution for the Area Code

The LNPA WG supports the all-services overlay for Area Code Relief. This approach minimizes inconvenience to consumers and supports the continuing trend in the United States to utilize overlays as the preferred form of area code relief.

AREA CODE OVERLAY

The application of Area Code Relief methods has continued to evolve since the late 1990's. Overwhelmingly, the preferred method of relief chosen is now the All- Services Area Code (NPA) Overlay. In fact, only one Area Code Split has been implemented in the last 5 years, compared to over 25 Overlays. NPA Overlays have both practical and technical positive implications for customers and service providers alike.

Benefits of All-Services Overlay

1. All current customers retain their existing area code and telephone number; no winners or losers.
2. No discrimination against customers on different sides of a boundary line, as does a geographic split when determining which side gets the new area code.
3. Less customer confusion and easier education process.
4. Minimized financial impact on business customers since there is no need to change signage, advertising, websites, checks and stationery (unless they currently show 7-digit numbers rather than 10-digit numbers).
5. Residential customers are not forced to update personal printed material such as checks or make changes to websites storing telephone numbers (e.g., banking, insurance, credit cards), unless they currently show only 7-digit numbers.
6. Does not split cities or counties into different area codes, keeping communities of interest intact.
7. No impact on some wireless customers that would otherwise require their handsets to be manually reprogrammed.
8. No technical impacts to text messaging, multi-media messaging or smart phone applications.
9. Provides the most efficient distribution of numbering resources by allowing assignments to follow demand, not withstanding forecasts for growth.
10. Minimizes call routing issues, especially with ported numbers.

11. No need for synchronization of old and new area codes in NPAC databases.
12. No technical impacts to number portability or toll-free number routing.
13. Missing and exploited children continue to be able to contact parents since their parents' area code and telephone number would remain the same.
14. Deployed Military personnel continue to have service since their area code and telephone number would not change.
15. No Caller ID confusion.

The All-Services Overlay is the Best Solution for the Area Code

Summary

In addition to the benefits above, an overlay is the superior option for area code relief for the following reasons:

- Most Equitable Approach – Treats all consumers the same
- Least disruptive for the consumer
- Easily implementable, as demonstrated by the large number of successful U.S. implementations since 2007
- Most consumers already comfortable with 10-digit dialing
- Avoids Local Number Portability (LNP) database problems associated with a split (e.g., updates to operational support systems with old and new area codes so port requests complete within the designated porting intervals)
- Facilitates future area code relief efforts