

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of ) DOCKET NO. 010743-TL  
proposed numbering plan relief )  
for the 407/321 area codes. ) FILED: January 28, 2002  
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**VERIZON WIRELESS' PREHEARING STATEMENT**

VERIZON WIRELESS hereby files its pre-hearing statement pursuant to Order No. PSC-01-2190-PCO-TL.

- | <b>A. <u>WITNESS</u></b>                                     | <b><u>ISSUES</u></b> |
|--|----------------------|
| Dana Smith, Technical Staff,<br>Numbering Policy & Standards | 1-3                  |
| <b>B. <u>EXHIBITS</u></b>                                    |                      |
| None.  |                      |
| <b>C. <u>BASIC POSITION</u></b>                              |                      |

The Commission should approve the industry consensus relief plan, an all-services distributed overlay for the 407/321 area. Although no solution is without cost or customer impact, the overlay proposal best serves the public interest because it is practical, cost-effective, flexible, fair, and forward-looking. In this instance, where an overlay is already in place, consumers are already familiar with ten-digit dialing. Overlaying another area code is the easiest, quickest and most efficient relief option and will not force customers to change area codes or reprogram their wireless handsets. The Commission should order implementation of an all-services distributed overlay and

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should adopt the industry's recommendation for preserving the life of the 321 NPA in Brevard County.

**Issue 1: What method of area code relief should the Commission approve for the 407/321 area codes?**

The Commission should approve the industry's consensus relief plan for another all-services distributed overlay. Verizon Wireless supports an all-services overlay for four key reasons: 1) an additional overlay is the most logical and efficient means of relief for an area such as 407/321 where an overlay already exists; 2) overlays minimize customer disruption caused by frequent area code changes – many customers in an area code are forced to change their telephone numbers during a geographic split; 3) with an overlay, there is no need to draw a boundary line to split the area into two sides, no need to guess at growth projections for each side, and no need to decide which side retains its area code; and 4) overlays work well in conjunction with conservation measures such as thousands-block number pooling and reclamation.

Previously, the Commission ordered the implementation of the 321 NPA as an overlay over the 407 NPA for Orange, Osceola, Seminole, and parts of Volusia and Lake Counties. The Commission also ordered that Brevard County split from 407 NPA and change to the 321 NPA. The combination of the overlay and the split allowed consumers in the new 407/321 overlay NPA to retain their phone numbers, while consumers in Brevard County were forced to change their numbers to retain 7-digit local dialing within the NPA. Now, the addition of another overlay for the 407/321 NPA could provide a benefit to all of the area's consumers through the availability of additional numbering resources to meet their telecommunications needs and with minimal burden to consumers in the 407/321 NPA. The 407/321 consumers are already dialing ten digits for all calls,

so the introduction of a new overlay is a relatively minor occurrence – they simply need to be notified of the new area code.

Brevard County also can benefit from the industry’s recommendation. In addition to recommending another overlay for the 407/321 area, the industry supported moving the remaining unassigned 321 central office codes (often referred to as “NXX” codes or “NXXs”) from the 407/321 overlay area to Brevard County as soon as possible. By preserving the remaining 321 NXX codes for Brevard County, those consumers who have already undergone a forced number change could enjoy a longer area code life.

**Issue 2: When should area code relief occur?**

Area code relief should be implemented as soon as possible to realize the greatest benefit for Florida consumers. As stated above, the industry’s area code relief recommendation proposes: 1) adoption of another overlay for the 407/321 overlay area and 2) extending the life of the 321 NPA in Brevard County. The sooner an all-services overlay is implemented in the 407/321 NPA, the greater the number of 321 NXX codes that will remain and be available for assignment in Brevard County. Although the industry will be able to implement an additional overlay more quickly than the time required for a split or an initial overlay, the Commission should still allow adequate lead time for carriers to implement the new overlay within their operational support systems. Given the imminence of exhaust, the necessary lead time, and the need to preserve the remaining 321 NXXs for Brevard County, the Commission should issue a final Order as quickly as possible.

**Issue 3: What should the dialing pattern be for the method of relief chosen for the following types of calls:**

If the Commission approves the industry consensus recommendation for an all-services overlay of the 407/321 area, the following dialing pattern should be used:

- a) **Local** – 10 digits with 1+10 digits permissive
- b) **Toll** – 1+10 digits
- c) **EAS** – 10 digits with 1+10 digits permissive
- d) **ECS** – 10 digits with 1+10 digits permissive

Respectfully submitted this 28th day of January, 2002.

**VERIZON WIRELESS**

By:  \_\_\_\_\_

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Verizon Wireless' Prehearing Statement has been furnished by U.S. Mail to the following this 28th day of January, 2002.

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