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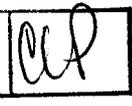
Arizona Corporation Commission
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February 8, 2001

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RE: Docket No. [REDACTED] NPA Relief Plan for the 520 NPA

To Whom It May Concern:

Citizens Communications is highly concerned with the Staff's recommendation to split the 520 NPA geographically along the Tucson corridor.

Citizens is a major service provider in Arizona's rural areas. The new NPA code would apply to *all* of Citizens' embedded base properties and customers, including those served by Navajo Communications Company, Inc., Citizens Utilities Rural Company, and Citizens Telecommunications Company of the White Mountains, Inc. The Staff's recommended new NPA code would also apply to the Qwest and Verizon exchanges Citizens has acquired, upon Commission approval in Docket Nos. T-01051B-99-0737, T-01954B-99-0737 and T-01954B-99-0511, T-01846B-99-0511.

Citizens' costs to accommodate the area code change would be substantial, to say the least. To implement the new area code, Citizens projects costs totaling \$3,658,000, excluding internal enhancements to the billing systems and the necessary contractor services required to make all the requisite changes.

The costs involved in making all the requisite modifications to assimilate a new area code are overwhelming. Citizens anticipates a cost of \$2,800,000 to convert existing and newly acquired central offices; there would be 80 offices at an average of \$35,000 per office. The cost of converting Citizens' E9-1-1 Public Service Answering Position (PSAP) Network and Selective Router equipment is also considerable. At a cost of \$2.00 per directory number, changing the area code in each of the line translations in the PSAP and Selective Router databases would result in a cost of \$692,000.

Citizens would also bear significant costs to convert billing and customer record systems, directory publishing, LIDB/E800 SS7 networks, Operator Services/Directory Assistance databases, Local Exchange Routing Guide, Calling Cards, and recorded announcements. Attached as Citizens' Exhibit 1 is a list of major tasks and the associated costs Citizens will incur if the Staff's recommended geographic split becomes effective.

The costs associated with geographically splitting the 520 NPA and assigning a new code outside the Tucson corridor are staggering. As Citizens is a major service provider in much of this rural area, Citizens' customers and its shareholders would bear the brunt of the burden of these costs as a result of allowing the Tucson corridor to retain the 520 Area Code. If Staff's recommendation is approved, Citizens will be forced to seek recovery of these unnecessary costs in the rate application it must file 18 months after taking over the Qwest rural wire centers.

One other point of concern: Citizens, as a major service provider for rural Arizona, has not experienced the growth rate detailed in the NeuStar planning documentation. The Commission should review the Numbering Resource Utilization/Forecasting (NRUF) reports required from each code holder to verify code usage, code fill and code conservation measures.

Citizens respectfully requests the Arizona Corporation Commission reject Staff's recommendation for a new NPA code outside the Tucson corridor. Requiring Citizens' rural customers to change area codes affects the people who can least afford the costs of the change. Citizens proposes the Commission adopt an all-services overlay for the entire geographic area encompassed by the 520 NPA.

Thank you for your consideration of these matters that so clearly and significantly affect a growing number of our customers.

Very truly yours,



Curt Huttzell, Ph.D.
Director - State Government Affairs
Citizens Communications

Enclosures

cc: Mike Grant

CITIZENS' EXHIBIT 1

520 – Relief Plan Task List & Associated Costs

- ◆ **Operator Services/Directory Assistance** – The DA and AABS will require changes at a cost of \$80,000 to outsource to Qwest, 411 Online, and Nortel.
- ◆ **Network Switching Translations** – All switching systems will require duplicate translations for permissive dialing.
- ◆ **LIDB/E800 Database Updates (SS7 Network)** – Origination/destination point codes, Global Title Translations, etc.
- ◆ **Provisioning Engineering** – Most switching systems will require ANI conversion for permissive dialing. Estimated costs, based on 80 offices at \$35,000, totaling \$2.8 million.
- ◆ **Plant Service Center/Data Processing** – All customer records and special circuit records will require changes.
- ◆ **Public Relations** – Customer notifications, including required bill stuffers, media coverage, and newspaper adds estimated at \$47,000.
- ◆ **Local Exchange Routing Guide (LERG)** – Industry database changes.
- ◆ **E911/911 Database Administration** – All customer records must be changed in Selective Router type databases and PSAP databases. Estimated costs, at \$2.00 per line times 346,000 lines, totaling \$692,000.
- ◆ **Customer Care Center** – All Citizens customer calling cards are impacted totaling \$20,000.
- ◆ **Coin Stations** – All instruction cards and numbers will have to be changed totaling \$7,000.
- ◆ **Billing Messages** – Customer account scrubs will have to be run to update all customer records estimated at \$12,000.