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Arizona Corporation Commission
Utilities Division
Attn: Deborah R. Scott

Phoenix, Az.

Re: Docket No. T-00000F-99-0641 Relief plan for 520 NPA

Dear Ms. Scott:

2/2/2001

Received your memorandum regarding the relief plan for NPA 520. After reading this memorandum, Interstate Wireless (Handy Page) has 2 concerns we would like to have addressed.

Handy Page is currently using a Type 2a, WIDE AREA CALLING number scheme for our paging. This allows us to use our NXX, (601), for incoming pages over a very wide area of Arizona. Before we went to this method, we were using thousands, and thousands of numbers on separate D.I.D. trunks going to numerous areas. We consolidated these D.I.D. trunks to a switched based single NXX system, thereby saving thousands and thousands of numbers throughout our coverage area, (primarily rural Arizona).

The WIDE AREA CALLING scheme provides a CMRS provider LOCAL, 7 digit calling numbers for our paging customers through out the LEC's serving area. Because of the way the WIDE AREA CALLING scheme is installed by Qwest and Citizens Communications, we have 2 connection points at this time,(per the LERG database), one at Phoenix Main Tandem for all Qwest switching in the Northern LATA, (602,480,623 & 520), and one at Show Low for all Citizens switching,(520). We are currently planning on installing a new connection to the Tucson Main Tandem to get Qwest southern LATA traffic.

This is where we have a problem. Per your Memorandum Page 13-d, You are recommending that "CMRS providers be allowed to grandfather a NXX code subject to the condition that duplication of said code would not be requested in the new NPA code". If we connect to Tucson at this time, we would be using the same NXX code(601) we are using in the 602 and 520 NPA's. When the NPA is changed, our Tucson 601 NXX would stay with NPA 520,

EXCEPTION

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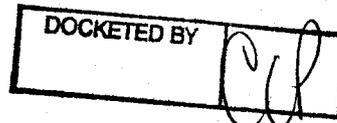
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but our Show Low 601 NXX would need to go to the new NPA, thereby violating your recommendation. I understand that because of the nature of our switching connections, and the WIDE AREA CALLING scheme, (which is saving telephone numbers), we might need to be an exception to your recommendation.

The SECOND concern I have is where the area for the geographic split would encompass. I have not heard any concern from any of the other providers regarding the placement of the LATA boundaries within this area. The LATA boundaries dictate where the main switching, (tandem), and provider connections need to go to. It would be more advantageous to have a single NPA within the LATA boundary, than to have it cross both the northern and southern LATA's.



Wayne Markis
President
Interstate Wireless, Inc.