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Richard Boyles  
AZ Corporation Commission  
1200 W. Washington St. Suite 200  
Phoenix, AZ 85007

AZ CORP COMMISSION  
DOCUMENT CONTROL

Re: Proposed Breakup of Area Code 520

Dear Mr. Boyles:

DOCKET NO. 1-000007-99-0641

After asking many questions, I am convinced the proposed breakup of area code 520 is unnecessary for the foreseeable future. The extra effort required by your office in order to avoid this would save a tremendous amount of inconvenience and expense for the people within the area code.

The problem is being misrepresented as a shortage of prefixes caused by the proliferation of cell phones, pagers and fax machines. The real problem is that only a fraction of the actual phone numbers within these prefixes are being used before other prefixes are assigned to new telephone service providers. We are running out of prefixes way before we are running out of phone numbers. The fact that 674 of the 792 prefixes within area code 520 have already been assigned doesn't mean we need another area code, it just means the method of assigning prefixes needs to be changed and existing assignments fixed.

The FCC's "Thousands-Block Number Pooling" program is designed to fix the problem. The Arizona Corporation Commission has been authorized to begin implementation. So, why are we talking about breaking up the 520 area code?

The reason, it appears, is the Arizona Corporation Commission is focusing on the symptom of the problem (running out of prefixes) instead of the cause (faulty prefix assignment). For example, your AP press release which appeared in the Arizona Republic on 25 Oct said we have two options: a new overlay area code or a new geographical split area code. Then, the Corporation Commission representative I spoke with on the phone said the same thing, and denied that there are plenty of actual phone numbers remaining within area code 520. Also, the nine pages of information faxed to me by the Arizona Corporation Commission deals with the same two options, both bad and both unnecessary.

Please consider the following course of action in order to avoid

this tremendous inconvenience and expense to the people within the 520 area code:

1. Give area code 520 first priority in implementing the Thousands-Block Number Pooling program, rather than proceeding in order of city size. Knowing that Phoenix already has three area codes (almost 24,000,000 phone numbers), I believe area code 520 should take precedence because it is closer to being classified as "in jeopardy." Begin immediately.
2. Consolidate rate areas where possible. This will provide a cushion of time for the implementation of the Thousands-Block Number Pooling program.
3. Decrease the time period required before a disconnected number is reassigned. This will gain additional time by making more numbers available.
4. Solicit the cooperation of service providers. They may be willing to return a portion of their unused numbers, or at least scale back on marginal requests for new numbers.
5. Consider cancelling reserved prefixes and putting a limit on new assignments until the Thousands-Block Number Pooling program is in place.

Sincerely,



W.H. Smith

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