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Ms. Deborah R. Scott  
Director-Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

RE: 520 NPA RELIEF DOCKET  
COMMENTS OF COX ARIZONA TELCOM, L.L.C.  
DOCKET NO. T-00000F-99-0641

Dear Ms. Scott:

Pursuant to your June 14, 2000 letter filed in the above-referenced docket, Cox Arizona Telcom, L.L.C. ("Cox") submits these comments with respect to the 520 NPA Relief Plan proposed by NeuStar.

Cox does not support the recommendation of an overlay for the 520 area code. Rather, Cox strongly supports the adoption of a geographic split for the 520 area code, just as this Commission recently adopted a geographic split for the 602 area code. While area code changes are always inconvenient for consumers, Cox believes that a geographic split is least confusing for consumers – particularly given the enormous area covered by the 520 area code – and is competitively neutral with respect to telecommunication providers. Moreover, Cox believes the NeuStar overlay proposal is not supported by a "true" industry consensus; rather it is based, at best, on a weak consensus adopted through a questionable process.

**A. The Overlay is Not in the Public Interest**

**1. Adverse Consumer Impact**

Many state public utility commissions have been faced with the choice between overlays and geographic splits for NPA relief. In most instances, state PUC's – including this Commission with respect to the

602 area code – have adopted geographic splits rather than overlays because geographic splits are less confusing and less disruptive to consumers. Consumer surveys repeatedly have indicated a preference for geographic splits. Indeed, in connection with the 602 area code relief plan, a consumer survey indicated that a geographic split was preferred over an overlay by a 46% to 21% margin. [See Decision No. 61301, paragraph 19]. In surveys, consumers consistently have indicated that they prefer the geographic split because: (i) they highly value retaining 7-digit dialing within their local calling area; (ii) they prefer the link between an area code and the geographic identity of the area they are calling; and (iii) they prefer having the same area code for all telephone numbers assigned to the same location – *that is, they do not want two area codes for the same house or same office.*

The reasons underlying the preference for a geographic split are amplified where the NPA needing relief: (i) covers an extensive geographic area; (ii) involves many rural communities; and (iii) affects more than a single rate center. For example, because many of the consumers who will be affected by the 520 relief plan live in small communities, the vast majority of their phone calls will be within that community. In such an instance, the retention of 7-digit dialing is even more valuable to those consumers, who will not have to think twice about what area code to dial for almost every call they make. Why should someone living in Prescott have to dial digits for all calls to Prescott numbers *and* have to learn what area code to use for each of those calls?

Moreover, the geographic identity is more important where a large area is involved. Under the geographic split, the I-10/Tucson corridor will remain 520 and "rural" Arizona (*i.e.*, not Phoenix or Tucson) will possess its own unique geographic identity with the new area code. The proposed overlay is, in effect, a statewide geographic identity with the new area code. The proposed overlay is, in effect, a statewide overlay which truly destroys geographic identity and confuses consumers. With a statewide overlay, a consumer may not know if the party with the new area code is in Kingman, Yuma, Show Low or just down the street.

Finally, because more than one rate center is involved, a geographic split helps ameliorate the difficulty for consumers in determining whether a call is a toll call. With a geographic split for the 520 NPA, calls to a different area code are certain to be a toll call. With an overlay, a consumer cannot easily know if a call is a toll call.

Although several state PUCs have adopted overlays, it has become apparent that overlays are confusing to the general consumer. *Indeed, at least one state (California) has rescinded an overlay after extremely*

*negative public reaction.* Attached are several news articles that contain sharp criticisms of the overlays adopted in their area, based on consumer confusion and consumer aversion to 10-digit dialing to call their neighbor. [See Attachment A]. For example, the Denver Post article entitled, "Code 720 Gives Area Lost Feeling" contains criticisms from a trade group representing hospitals that claims many patients cannot reach the hospitals or get through to overlaid hospital numbers. The article also quoted the advice, "If you can avoid getting a 720 [overlaid] area code, do it".

## 2. Harm to Competition

Since US West has been providing service in the area covered by the 520 NPA for approximately 80 years, US West possesses the vast majority of 520 NXXs (particularly in Tucson). Even if the remaining 520 NXXs were reserved for new entrants upon adoption of an overlay, US West (or another incumbent monopolist) would still hold the bulk of 520 NXXs. However, the ability to offer potential customers a telephone number with the recognized 520 NPA is very valuable – either for the recognition of the established 520 area code or for the ability of a customer to add an additional line that has the same area code as its other lines. Under an overlay, CLECs would be at competitive disadvantage in attracting new customers. For example, if a new CLEC customer wants two lines, an overlay often forces a CLEC to offer that customer phone numbers with two different area codes – one number ported from the ILEC with the old area code and one number (new from the CLEC with the new area code) – because the CLEC has far fewer NXXs from the old area code to offer than does the ILEC. Moreover, the programming difficulties upon implementation of a new area code makes it more difficult for customers with the new area code to receive calls. Potential callers will need to reprogram their PBXs or other internal telephone equipment to recognize the new area code in order to place calls to the new area code. If they do not, the calls do not go through to the new area code. Examples of those problems are documented in the Wall Street Journal article; "Prisoner of Bell Atlantic" [See Attachment A]. Those circumstances also make the 520 area code more valuable to consumers.

These concerns are born out by surveys that indicate consumers consider the area code available as a critical factor in choosing a provider. US West will be greatly advantaged by the fact that the significant inconvenience and confusion related to the new area code will be borne largely by customers and potential customers of US West's competitors, such as Cox. Moreover, it is US West's competitors who will be forced to expend resources to overcome these substantial disadvantages. Only in

a geographic split, where all customers in an area receive a new NPA, would an NPA change for a customer not create such confusion and not act as a deterrent to choosing a competitor's services.

## **B. Need For Consistent Commission Policy**

In the recent 602 relief plan (Decision No. 61301), this Commission recognized the numerous problems with an overlay – particularly the consumer confusion and consumer desire for a geographic identity – and adopted the geographic split for the 602 relief plan. Cox submits that the Commission should not ignore those consumer concerns for the 520 area code. Indeed, as set forth above, those concerns are great for the 520 area because: (i) the 520 area covers a much larger area;<sup>1</sup> (ii) the retention of 7-digit dialing is even more advantageous to consumers; (iii) the importance of geographic identity to rural communities is higher; (iv) the potential for customer confusion is greater; and (v) more than one rate center is affected. The Commission should follow the precedent recently set for the 602 area code and treat all Arizona communities in the same way. It does not make sense to have a geographic split for the Phoenix area and an overlay for the rest of the State.

## **C. Comments on the Proposed Overlay Relief Plan**

The overlay does not provide any significant advantage to consumers except that more consumers need not change existing phone numbers. Indeed, as the NPA Administrators' initial petition reveals, the overlay will provide a slightly *shorter* period of relief than a geographic split. Should this Commission ultimately decide that choosing an overlay over a geographic split is in the public interest, Cox recommends that the Commission adopt conditions to ameliorate the consumer confusion and the anti-competitive impact of the overlay. In particular, Cox urges that the Commission require unassigned number porting and quickly enact appropriate number pooling measures to minimize the anti-competitive impact of the overlay on new entrant telecommunication providers.

Moreover, Cox has serious concerns with the "industry consensus" underlying the NPA Administrators' overlay proposal. The consensus was arrived at during a conference call of only twelve affected carriers. It was not stated in the notice for that conference call that a binding vote would be taken to set the industry consensus for the relief plan [See Attachment B]. The notice only stated that the call was "to discuss the two relief alternatives ... and determine if industry consensus can be reached to recommend one of the alternatives as the Industry's preferred relief alternative". According to the notice, Commission Staff was concerned that only one meeting and only one conference

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<sup>1</sup> It is ironic that NeuStar would propose an overlay for an area as large as the 520 area because overlays were envisioned to be best suited for use in regions *too small* to make a geographic split practical.

call had been held to address the important issue. The lack of clarity for the purpose of the call is highlighted by the fact that at least two of the participants on the conference call did not have authority to cast a vote when they initially joined the call. One participant, over the course of the call, voted against the overlay, voted to abstain, and then, ultimately, voted in favor of the overlay. The conference call lasted less than 30 minutes and consisted almost exclusively of casting votes – the two relief options were not discussed in any detail and no meaningful minutes were taken [See Minutes, Attachment C]. The vote of the 12 participants was 8-4, with wireless providers and incumbent providers weighing heavily on the overlay side. CLECs who will be serving residential consumers supported the geographic split. Cox submits that the overlay proposal is not an industry consensus and so-called “industry consensus” should not carry any weight in this Commission’s decision making.

**D. Adoption of Numbering Pooling**

Cox believes that number pooling as defined in the FCC’s order on number resource optimization (CC Docket No. 99-200) should be incorporated into any relief plan adopted by the Commission.

In summary, Cox urges this Commission to adopt a geographic split as the 520 NPA relief plan. If you have any questions, please feel free to contact me.

Sincerely,



Bradley S. Carroll  
Manager, Regulatory Affairs

BSC:pd

Cc: Docket Control (Original + 10 copies)  
Chairman Carl J. Kunasek  
Commissioner Jim Irvin  
Commissioner, William A. Mundell  
Mr. Jerry Porter  
Mr. Patrick Black  
Mr. Hercules Dellas  
Mr. Del Smith  
Ms. Maureen Scott, Esq.  
Mr. Craig Wiseman (NeuStar)

**Attachment A**

February 19, 1999 Friday 2D EDITION

SECTION: A SECTION;

Pg. A-01

LENGTH: 998 words

HEADLINE: Code 720 gives area lost feeling

BYLINE: By Roger Fillion, Denver Post Business Writer

BODY:

U.S. Rep. Tom Tancredo's office has been getting telephone calls from some baffled constituents and others who live in the Denver area.

"I have had calls from people who say: 'Where are you? Is this the D.C. office?'" says staff assistant Beth Cooper.

Nope. It's Littleton. But it just so happens the new Washington lawmaker has been assigned a 720 area code for his main Colorado office.

It's the new area code in the metropolitan area that few want - and few have called.

If you're getting a new phone line in the Denver area, you too may get a 720 code from your local phone company. But don't feel singled out. You've got company, including Tancredo and state Sen. John Andrews of Englewood. Andrews has a 720 number for his home office.

They're part of a small but growing number of people and businesses assigned phone numbers with the 720 code. Introduced late last year, the code overlays the existing 303 code, which is running out of available numbers.

Here's the good news.

Denver-area residents are expected to adapt to a 720 world - just as people have adapted to 10-digit dialing of local calls, begun in September because of the 303 depletion. And Denver isn't the only place undergoing such changes. Philadelphia, Dallas and Houston are, too.

"Some of us are old enough to remember when you didn't need a ZIP code to deliver your mail. And now it's become second nature," notes Andrews, a Republican.

But just like 10-digit dialing, the introduction of 720 has sown confusion and problems.

Mystified callers think 720 is a long-distance call. Some mistakenly put a "1" in front of the number. Automated phone systems in big offices outside Colorado may not be programmed to recognize 720, so long-distance calls through such PBX systems don't make it to Denver. Or people scribbling down a 720 number erroneously write 702, the original area code for Nevada.

"If you can avoid getting a 720 area code, do it," warns Kim Gordon, a telecommunications industry consultant who lives in Littleton.

Gordon's residential phone has a 303 area code. Earlier this year she set up a home office. The phone and fax machine were assigned a 720 code. "Everybody in Denver thinks you're out of town," says Gordon. That's not the only thing. A

client in Washington tried to fax her a document, but it failed to go through. "He thought I'd made a mistake on the area code," recalls Gordon.

Wrong. The company's phone system hadn't been programmed to comprehend 720. The situation was corrected after people in Washington tinkered until 9 p.m. "It took us a while to figure it out. It was a hassle," says Gordon.

The 720 code, which recently began rearing its head, is tied directly to 10-digit dialing of local calls in the metro area.

State regulators, faced with exhaustion of 303 numbers, decided to overlay the new 720 code atop the existing 303 area code. That means if you get a new phone line, you could get a new 720 code for that line. Or you may have to dial 720 to reach your next-door neighbor.

It's all because there will be duplication of seven-digit numbers between the two codes, and all calls will be routed correctly only when customers dial the full 10 digits.

US West Inc. and other telecommunications carriers - including cellular and paging companies - began doling out 720 numbers in November and December.

As of Feb. 13, 1.95 million 720 numbers had been handed out to the carriers for their use, according to the Lockheed Martin Corp. unit in charge of allocating the numbers.

It isn't known how many 720 numbers are in actual use, because that's confidential. There are 7.9 million phone numbers within an area code.

Jack Ott, area code planner for US West, says the regional Baby Bell still has a some small blocks of 303 numbers available for use. Larger phone users, such as businesses, are more likely to be assigned the 720 code, he says.

Other factors, such as demographics, are at work. "If you're in a much faster growing area, you're more likely to get a 720 number. But if you're in a more stable area with less growth, chances are better you'll get a 303 number," says Ott.

The new code can bring with it surprises. Take Tancredo, for example.

The Republican congressman admits to getting more than a few calls after skipping President Clinton's State of the Union address last month because of the Monica Lewinsky affair. But he says he wasn't trying to duck anybody who called his Littleton office and couldn't get through on the number supplied by directory assistance.

A major telephone snafu at the new office prompted calls to his house, which Tancredo doesn't occupy much because he spends most of his time in Washington. A home recording gave callers a workable office number to dial. Problem was, some folks thought that dialing that 720 number required coughing up some extra money.

"Oh, you expect me to call long distance and yell at you," was the kind of angry message Tancredo was getting on his home answering machine, according to the congressman.

Tancredo did change the phone message to make clear that 720 isn't a long-distance call. But that confused out-of-town callers. Yet another change was required. "It was really crazy," Tancredo says.

The Colorado Health and Hospital Association, a trade group representing Colorado hospitals, has experienced its own 720 oddities. "We're finding a lot of people in the Denver area can't reach us because they're dialing 1," says Vice President Peg O'Keefe.

"Then there are the mystery issues. We will have people tell us they called six times and couldn't get through. They then got through on the seventh time, but not the eighth," adds O'Keefe. US West has been working diligently to remedy the situation, O'Keefe says. It has assigned "a specialist in repair escalation" to tackle the matter, she notes with a laugh.

"We've kept our sense of humor. And the 'specialist in repair escalation' has helped," says O'Keefe. "We appreciate that."

GRAPHIC: PHOTO: The Denver Post/Craig F. Walker Consultant Kim Gordon uses two phones with 720 and 303 area codes in her home in Littleton.

LOAD-DATE: February 22, 1999

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The Baltimore Sun

November 27, 1998, Friday, FINAL EDITION

SECTION: TELEGRAPH (NEWS),

Pg. 1A

LENGTH: 995 words

HEADLINE: Using new area codes, 'no one believes you'; Numbers make taxis, pizzas harder to order

BYLINE: Dennis O'Brien, SUN STAFF

BODY:

They have trouble ordering taxis, cashing checks and getting pizzas delivered.

They are the roughly 17,000 unlucky telephone customers with the state's newest area codes -- 443 and 240.

"The biggest problem is that no one believes you," said Kashmere Davis, 42, of Gaithersburg.

Davis said that when she needs to provide her telephone number with the 240 area code, store clerks become confused. And taxi dispatchers are blunt -- they tell her no such area code exists in Maryland.

"I tell them to call me back to check, and then I have to hang up and they call me back," she said. "That's how I get a cab."

Davis said her telephone didn't begin ringing until three weeks after she moved into her apartment this fall. Friends and relatives had tried to reach her but used the 301 area code because that was what her neighbors had.

"It's crazy," she said.

Bell Atlantic won state approval to distribute the new area codes when the company was given permission to begin 10-digit dialing in 1995. The move is necessary because of an increased demand for new phone numbers among Bell Atlantic's 2.4 million customers spawned by the proliferation of fax machines, cellular phones, computer modems and other electronic devices, said Sandra Arnette, a Bell Atlantic spokeswoman.

Bell Atlantic began giving out the numbers to business and residential customers early this year. The company has so far distributed about 10,000 telephone numbers with the 443 area code and 7,000 numbers with the 240 area code, Arnette said. The 443 code is used in the 410 calling area and 240 in the 301 area, she said.

New customers are assigned the numbers and long-distance charges apply only when a caller needs to dial 1 before the area code, Arnette said.

Bell Atlantic's competitors declined to disclose how many of their customers have the new area codes, saying such information is proprietary in a competitive market.

Fewer problems expected

"It may seem like a problem now, but it'll become less of a problem as more customers get the new numbers and more people hear about them," said Joe Paluska, a spokesman for MCI WorldCom Inc.

Customers with the new numbers say few know about the new area codes now.

"It's been a nightmare," said Mark Settar, assigned 443 when he and his wife purchased a Glen Burnie condominium in April. The couple has had trouble ordering pizza deliveries from shops that require callers to give a home telephone number.

Said Irene Settar, "I've had the manager think it was a crank call and get nasty at me."

Mark Settar, a barber and hairstylist, had to print the phrase "NOT A LONG DISTANCE CALL" on his business cards so that customers at his Columbia salon, Total Concepts, would call him at home to arrange or reschedule appointments. The couple has the same phrase printed under the phone number in their church bulletin so other members will not be reluctant to call.

"If I had to do it over again, no way would I take this number," said Settar.

Old numbers dwindling

Customers will soon have no choice.

Arnette said an extremely limited number of 410 and 301 area code phone numbers are available. The only 410 numbers left are from lines that have been disconnected and are being "recycled" to new customers, she said.

Maryland survived with a single area code -- 301 -- until 1992, when the state was split in two to create the 410 area code, which was expected to settle matters until 2012.

In 1995, however, Bell Atlantic won approval from the Public Service Commission to distribute the two new area codes after reporting that the state would run out of 301 and 410 phone numbers by late last year because of the rapid increase in cell phones and other technology.

Overlays approved

The PSC also approved Bell Atlantic's proposal to "overlay" the new area codes -- 443 over the 410 area code and 240 over the 301 area code -- rather than carving out new geographic boundaries for them.

Bell Atlantic argued that combining the new and existing area codes would avoid forcing businesses to print new letterheads and business cards if they were forced into new area codes by a geographic split.

Businesses affected, too

At least two major business customers, Morgan State University and the Johns Hopkins University Applied Physics Laboratory, ran into problems anyway when they revamped their telephone systems this year and began using the new area codes.

The Applied Physics Laboratory near Columbia, located on the edge of the 410 and 301 area codes, was one of the first Bell Atlantic customers to receive a new area code when it switched to a new telephone system in February.

Overall, the system worked well, said Jim Hagan, APL chief of staff.

But many of APL's business customers had internal switching systems, known as private branch exchanges (PBXs), that prevented APL customers from calling the lab with the new telephone numbers, Hagan said.

"We had customers who had to call our employees at home to make contact because they couldn't get through," Hagan said. "People were saying, 'What kind of rinky-dink operation is that, where we can't even call you up?'"

Confusion in dorms

Wiley Hall, a Morgan State spokesman, said the school went to a new telephone system in August. But some students say telephone service in the dormitories has been beset by periodic outages since the switch.

Hall said the school is continuing to work on the problem. While administration and faculty offices remain on 443 lines, some dorm phones have 443 numbers and others have been switched back to 410, Hall said.

Kevin Howell, an 18-year-old freshman from Piscataway, N.J., was without phone service for two weeks because of the problems. He now has a phone in his room with a 443 number, while many of the rooms nearby have a different area code.

"I call the dorm room right next to mine, and I have to dial 410," Howell said. "It's weird."

Pub Date: 11/27/98

LOAD-DATE: November 28, 1998

November 27, 1997, Thursday, 0 South Pinellas Edition

SECTION: NATIONAL; Pg. 1A

LENGTH: 967 words

HEADLINE: Dialers say 10 digits is a wrong number

BYLINE: AMEET SACHDEV

BODY:

Telephone customers in the Tampa Bay area are ticked off.

Local government leaders, the Florida Public Service Commission, radio talk shows and GTE's customer service centers are getting bombarded with irate consumers' calls. They're steamed about GTE Corp.'s decision to require dialing 10 digits for local calls.

"I am incensed over GTE's lack of concern for the customer," said David Campbell of Clearwater. "I don't know anybody that would like to dial 10 digits."

GTE said Monday that it would make the switch to 10 digits - the area code plus the phone number - starting March 1. The company said the extra dialing is necessary to meet the growing shortage of phone numbers in the 813 area code, which covers Pinellas, Hillsborough and west Pasco counties.

GTE figures this solution is less onerous than splitting up the region geographically and assigning one half a new area code. Under a so-called overlay plan, the company can superimpose a new area code on the existing one and let customers keep their phone numbers. Only new lines will be assigned the new area code, but all customers have to dial 10 digits to complete local calls.

"I'm sure most consumers prefer that there be no changes," said GTE spokesman Jim Marzano. "But there is no magic bullet."

GTE says the overlay plan will be less confusing for callers and saves businesses the expense of printing new stationery, business cards and signs. But the solution creates the possibility that neighbors, or even two phone lines in the same house, will have different area codes.

Telephone customers in Maryland, the first state to implement the overlay plan, are dealing with that frustration now. Despite a massive public education campaign by Bell Atlantic Corp., residents were scrambling at the last minute to reprogram speed-dialers, fax machines and computer modems to accommodate 10-digit calling before it became mandatory in May.

One business owner in suburban Maryland has a warning for GTE customers: Get used to hearing a recorded message telling you to dial the area code. "I hate it," said Ben Kinningham, a recreational vehicle dealer in College Park, Md. "For the first six months, it'll drive you crazy."

The decision to divide regions geographically by area code or use the overlay plan is confronting state regulators and local telephone companies all over the country. There is growing acceptance of - or resignation to - the idea of dialing 10 digits, instead of seven, to make a local call. Atlanta residents will begin doing just that in January.

Ten-digit dialing is still more than three months away in the Tampa Bay area, but residents already are getting worked up.

Callers on talk shows ask why the new area code can't just be assigned to users of wireless phone services, such as cellular phones and pagers. That's a no-no, GTE says, because the Federal Communications Commission ruled that the practice is discriminatory.

St. Petersburg businesses have called the Chamber of Commerce wondering whether calls to Tampa and vice-versa will now be charged long-distance rates. Those calls will still cost 25 cents, and local calling rates will not change under the overlay plan.

Advocates for the elderly say that local calls will become more difficult for callers with poor eyesight or stiff fingers. "I don't think this is user friendly for older people," said Helen King, assistant director of the Area on Aging in St. Petersburg. "I do think there will be a great deal of confusion and misdirected calls for quite a while."

Some of these same concerns were expressed last month when the PSC held public hearings in Miami and Key West where BellSouth Corp., the local phone company in South Florida, is pushing the overlay plan aggressively. Phone numbers in the 305 area code, which covers Dade and Monroe counties, are running out.

The PSC received protests from consumers, consumer groups and telecommunications companies over the plan and decided to intervene. Local telephone companies, which administer the area codes, are not required to get PSC approval on area code changes unless there is a protest.

"The idea of using two area codes in the same general vicinity just doesn't sound right, and it does not make much sense for the standard telephone call to have to use 10 digits to call across the street," Hollywood resident Marvin Kaleky wrote the PSC.

The PSC staff will make a recommendation in the case next week, and the commission will vote on the issue Dec. 16.

Some consumer groups are criticizing GTE for not holding public hearings before implementing the plan in Tampa Bay. "To have this happen with no notice or public hearings is an outrage," said Monte Belote, executive director of the Florida Consumer Action Network. "A number of alternatives ought to be discussed before playing God."

Marzano said the costs of holding public hearings would have been prohibitive. Instead, GTE relied on surveys of 900 consumers and 200 businesses in Tampa Bay to gauge public reaction to its overlay plan. The surveys showed that more consumers and businesses supported the overlay plan compared to a geographic split.

"The market research is scientific and gives us a pretty good read on the community," Marzano said.

Public hearings are still possible if the PSC intervenes in the case.

"We've gotten a few calls and we've heard from both sides," said PSC spokeswoman Melinda Pace. "I expect we will see more calls coming in next week."

- Information from Times files was used in this report.

Where to call

To contact the Florida Public Service Commission, which regulates utilities, call (800) 342-3552.

LANGUAGE: ENGLISH

LOAD-DATE: November 28, 1997

12-30-78  
SF Chronicle

# L.A. Callers Balk At Dialing 11 Digits

Region first to get area code overlay

By Deborah Solomon  
CHRONICLE STAFF WRITER

LOS ANGELES — Sparkling blue, five-foot-high waves crashed with a thunderous roar into the shore at Hermosa Beach, but Delme McIntyre and Carol Clark were more interested in the rough waters they see ahead for the Los Angeles area.

"You mean I'll have to dial 1 (310) and your phone number to reach you?" an incredulous McIntyre asked Clark, her eyebrows rising above her wraparound shades. "I didn't know about this. Why that's the dumbest thing I've ever heard. It's going to be so confusing."

Clark, equally annoyed, nodded in agreement with her morning stroll partner.

"Nobody knows about this," Clark said. "I knew because I saw it in my phone bill, but most people probably don't have a clue. There's going to be mass confusion."

In sun-drenched Los Angeles, where setting trends is as important as knowing where to spot celebrities, residents are chafing at becoming the first in the state to blaze a new telecommunications trail.

How Los Angeles deals with the coming change is important for the Bay Area, which will soon go through

► AREA CODE: Page A9 Col. 3

# 11-Digit Dialing Is Latest Hang-Up for L.A.

► AREA CODE  
From Page 1

similar telephone tribulations. On April 1, 1999, residents in the 310 area code of Los Angeles will become the first Californians to get an area code overlay. Under the plan, current customers would keep the 310 area code. But every call made within the zone will require callers to dial 1 plus the area code and phone number — even if the call is to another 310 number next door.

And in 2000, all new phone numbers in the 310 region will get a different area code, 424, meaning residents will have neighbors — or even second phone lines — with a completely different area code.

It is not sitting well with residents in the 310 area, which covers the western part of the Los Angeles basin, from southern San Pedro through Beverly Hills and Santa Monica to beyond Malibu.

Most Los Angeles residents say they did not even know about the coming change, even though they are already supposed to be practicing dialing 11 digits. Those who are averse balk at the idea of having to dial 1 plus the area code for every call they make.

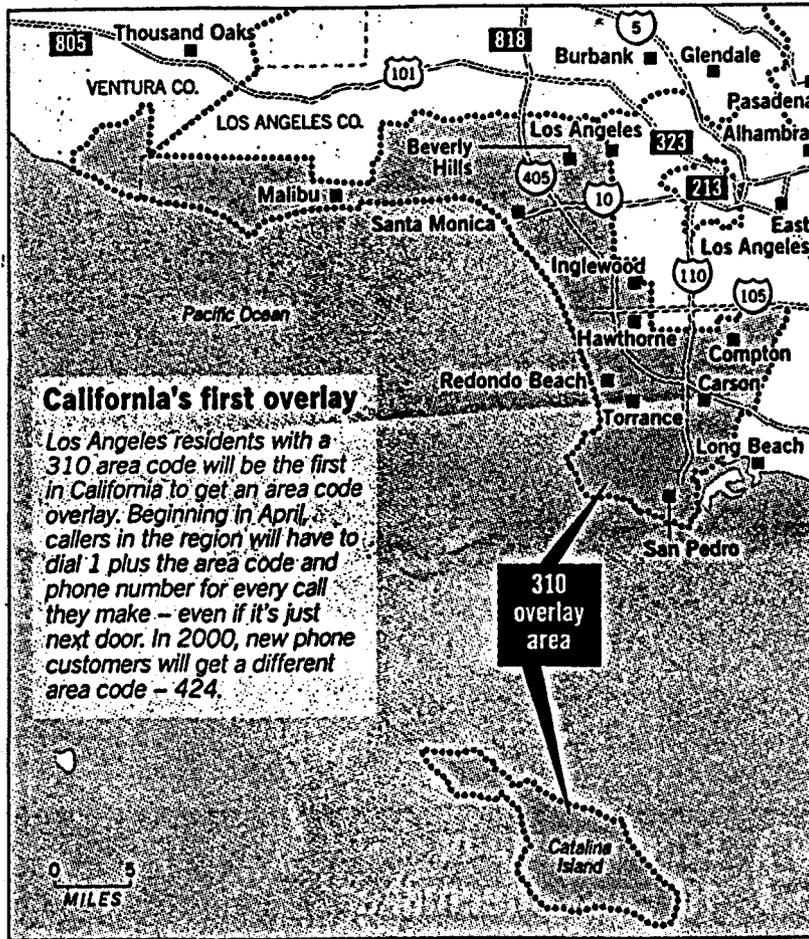
Bay Area residents will have to allow suit next year when the region gets at least one — and possibly two or three — area code overlays.

San Jose's 408 area code will start its transition to an overlay system next month, with 11-digit dialing becoming mandatory in October. An overlay has also been suggested for the 415, 510 and 650 area codes, which are running out of available phone numbers because of the increase in fax lines, cellular phones and computer lines, as well as a slew of small phone companies that are serving blocks of numbers for their dreams of future markets.

If what is happening in the 310 area is any indication of what the rest of the area can expect, residents could prepare themselves for mass confusion, denial and even revolt.

"I'm telling you, I can't even remember my own phone number sometimes. How am I supposed to remember to dial 11 digits when I make a call?" said Michael Hayes as he gazed at the ocean from the Santa Monica Pier. "I have too much on my mind already. I'm going to need to get some of that *uko biloba* if I'm going to remember to do this."

Dennis Doherty, who runs a trin-



Chronicle Graphic

ket shop on the pier, said he saw something about the 310 change in the mail but ignored it.

"I like it the way it is, and I don't want to change," said Doherty. "The phone company just wants to confuse us so they can make more money. It's stupid. Who wants to dial 11 digits to make a call? It's a chore."

Despite what some residents may think, the overlay is not intended to cause grief. State regulators approved the change earlier this year as a way to bring area code relief to 310, which is running out of available phone numbers. The 310 region was recently split from the 213 area code, and regulators did not want to make residents go through yet another area code change.

But some think a new area code would have been preferable to an overlay, which many people deem "weird."

"Who decided this?" said Laurel Collier, as she lunched with her mother in Beverly Hills. "This is a joke, right? Who dials their same area code to make a call? That's ridiculous."

Her mother, Lucy, chimed in that she remembered a time when dial-

ing 11 digits was a major event because long-distance calls were expensive and considered a luxury.

"It's just one more change I'm not prepared to deal with. It makes me feel really old," she said.

The younger Collier suggested that they could buy speed-dial phones, to make the transition easier.

"I bet the electronic stores will make a killing off this change," she said.

Don't tell that to the staff at Radio Shack. They say they have not seen a run on speed-dial phones or phones with a lot of memory.

"I don't think anyone knows about this yet," said a clerk at the Manhattan Beach Radio Shack. "Maybe once they do, we'll start to sell out. I hope so."

Employees at the Regent Beverly Wilshire hotel were also unaware of the overlay. A hotel manager who did not want to give her name said she did not know about the change, but said it probably would not affect guests very much.

"We usually place calls for our guests, so it won't affect them directly," she said. However, she said the idea of an overlay seemed "pecu-

liar." Mary Hull, who answers phones at Hermosa Beach City I said she tried to ignore the con change but eventually realize was not going to go away.

"When we first got a notice in phone bill at home, I gave it a quick glance and threw it away. I thought, 'That's nonsense. That could mean me. It's not going to affect me.'"

But a few days later, her husband called his doctor and was greeted a recording telling callers to reusing the area code and phone number.

"We didn't understand. The doctor's only down the street, and had no idea why we needed to dial the area code. Then it hit me," she said.

But while many are upset about the coming change, some are taking it in stride and even looking forward to it.

Lance, a surfer at Manhattan Beach, had not heard about the overlay, but said he could get used to it.

"So I could have a different area code than my neighbor? That's wild," said Lance, who goes by his first name only. "I think it's kind of cool. It's more European, you know? At least I think it is. Do they dial a lot of digits over there?"

The answer is yes. Many European countries require callers to dial 10 or even 12 digits to make a call.

But that is not enough to placate some residents who bristled when asked whether they should just do what the Europeans do and accept multi-digit dialing.

"That kind of influence we do need," said a shopper in Santa Monica. "We already drive their cars and buy their electronic products. That is just one more piece of America slipping away."

## Heavy Snowfall Expected in Midwest

CHICAGO — A powerful storm due in the central United States late New Year's Eve should leave behind six to 10 inches of snow from central Nebraska to Chicago by Sunday, meteorologists said.

Arriving over the northern Plains late tomorrow from the Pacific Northwest, the New Year's Eve storm should gradually spread eastward to Chicago and by late Sunday all areas should have received six to 10 inches of snow.

REUTERS

**THE WALL STREET JOURNAL.**

Article 1 of 1  
**LEISURE & ARTS**

**The Prisoner of Bell Atlantic**  
By Allan Chernoff

01/06/2000  
The Wall Street Journal  
Page A20  
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New York -- I have landed on Planet 646, home to Manhattan's new area code, surveyed the landscape, and am prepared to report back to inhabitants of 212: There appear to be few signs of life on 646; it is a lonely, isolated, largely undiscovered world to which few are willing to venture.

OK fine, I reasoned. It's understandable that 646 is alien to those whose identity is defined by 212 (and 718). But at least I'll be known in cyberspace. I try logging on to America Online. I type 646 at the prompt for area code directory. AOL responds, "We were unable to identify the country you are trying to call." My bank, among the nation's largest, is also under the impression that I'm living offshore. Its computer greets me with error No.3200 upon my attempt to access my online account: "The system did not respond to your request."

How lonely is it in area code outer space? Just imagine having to dial a "1" and area code before every call you make. Why, even phoning my next-door neighbor (if I ever meet him or her) is an interplanetary connection; I'll have to dial "1-212."

Truth is, I had been taking most of this with relatively good humor until I tried calling home from my company's New Jersey office. My call was met with the most lethal of the three-toned sound-effects, followed by, "WE'RE SORRY. YOUR CALL DID NOT GO THROUGH. WOULD YOU PLEASE TRY TO CALL AGAIN." The second call was met with the same audio punishment. Then, I tried yet another line. "YOUR CALL CANNOT BE COMPLETED AS ENTERED. PLEASE CHECK THE NUMBER AND DIAL AGAIN."

My sense of humor was now disconnected, replaced by a panicky recognition of the true extent of the isolation Ma Bell's vengeful child had imposed on me. Bad enough to have a number that no one will dial; even worse to be stuck with a number that won't answer if they ever do call!

What follows is a verbatim transcript of my conversation with Bell

Atlantic's service representative:

"There's a problem with my home phone. It doesn't seem to be working."

"What's the number?"

"646 --"

"I need an area code."

"That IS the area code."

"Where is that?"

**"MANHATTAN! IT'S THE NEW AREA CODE!"**

You know you're in deep doo-doo when even the phone company that stuck you with a bunch of alien digits doesn't recognize its own handiwork. The service operator put me on hold . . . and kept me on hold.

"Maybe the corridor to calling from out of state hasn't been opened up yet," opined another Bell Atlantic worker. "They probably just opened it up to local dialing. Some parts of the country may not be able to access it." I would call this a Mickey Mouse phone system. But at least in Disney World they can receive calls from out of state.

With each passing day my telecom identity crisis worsened. I needed some reassurance that I was still the man I was before losing my 212. I called 411.

"In Manhattan. I'd like a listing for Allan Chernoff please."

"I'm sorry. We have no listing for an Allan Chernoff." Not at my new address. Not at the old address.

Yet another illuminating discussion with a Bell Atlantic employee:

"The order has not completed yet. That's why you're not listed in the directory yet."

"But I have service. I've had service for six days already."

"It's still a brand new number, which means it takes time to go into directory assistance. The order hasn't completed yet." He explained the corporate process.

"Every order goes through three steps. First, Assignment. Second, Work Step. Then it goes to Completion. Your order is still in the Work Step. Completion is when we put your account into our billing system. Thank you for calling Bell Atlantic. We value your business."

At last, I heard something that made me feel better about my lot. A colleague recently attempted to call customer service at Central Hudson, the upstate New York utility that supplies electricity to

270,000 homes and businesses. He dialed the number stored in his PalmPilot. A polite voice gave him Central Hudson's "new number."

"Are you a Bell Atlantic operator?" the colleague asked.

"No," said the voice, wearily. "You've reached Soprano's Pizzeria."

Mr. Chernoff is CNBC's senior correspondent.

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**Attachment B**



www.neustar.com

## Conference Call Notification for Arizona 520

To: All 520 NPA Code Holders and Interested Industry Members

The Arizona Corporation Commission Staff has asked NeuStar NANPA to host a 520 Industry conference call to discuss the two relief alternatives that were submitted to the ACC on October 27, 1999 and determine if industry consensus can be reached to recommend one of these alternatives as the Industry's preferred relief alternative.

The Staff notes that they have "received informal comments that would suggest that some of the industry members who participated in the initial 520 relief planning process might be interested in participating in a meeting to see if industry consensus could be reached on a single relief plan. Staff is concerned that only one face-to-face meeting and a single conference call were held regarding such an important issue for the industry and its customers. Staff believes that if the industry were united behind a single relief plan that everyone involved in this process would benefit and an regulatory delay could be minimized. Staff requests that NANPA schedule a conference call with the industry ...in an effort to reach industry consensus on a single relief plan."

In response to this request, NANPA has scheduled a conference call on April 19, 2000 at 9:00 AM PT. The call in number is 847-413-2931 pass code 5069988#

If you need additional information, please contact Craig Wiseman, NPA Relief Planner – Western Region, at 303-841-1329. Thank you. Have a wonderful day. ☺

Contact Craig Wiseman  
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Fax 303-646-2197  
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**Attachment C**

**FINAL Meeting Minutes**

**NANPA  
520 NPA RELIEF PLAN (CONSENSUS) CONFERENCE CALL  
April 19, 2000**

**9:00 a.m., PDT**

**Facilitated by: Craig Wiseman, NeuStar NANPA**

**INTRODUCTIONS, AGENDA REVIEW**

VOTING (12): Carla Dickenson AT&T Government Affairs  
Julie Bunch AT&T Local  
Julie Maddox AT&T Local  
Brad Carroll Cox Communications  
Beverly Pryor ELI  
Barbara Jordan Espire  
Adriana Zavala GST Telecom  
Geneva Stroshane GTE  
Carol Fisher GTE  
Suzanne Brooks MCI/Worldcom  
Karen Jackson One Point Communications  
John Duffy US WEST  
Charlene Barbknecht US WEST  
Joanne Edelman Verizon  
Shirley Smith VoiceStream Communications  
Rose Briedenbaugh WinStar

NON-VOTING: Craig Wiseman NeuStar NANPA Relief Planning  
Tim Booth NeuStar NANPA Relief Planning  
Rebecca Beaton NeuStar NANPA Relief Planning  
Paula Hustead NeuStar NANPA Code Administration

Craig called the Meeting to order at 9:05 am, PST

The purpose of this meeting is to reconvene Industry Members, per the Arizona Corporation Commission's request, to determine whether Industry consensus could be reached to recommend one of the two preferred Relief Alternatives previously submitted to the ACC on October 27, 1999.

Craig reviewed the two plans that were previously submitted to the ACC (Alternative #2, a 2-Way Geographic Split, and Alternative #3, an All Services Overlay Plan).

A question was raised whether there would be any 9-1-1 impact to either of the two Alternatives being considered. US WEST indicated at a previous meeting that they have scheduled upgrades to their 9-1-1 systems in this region. US WEST responded that the impacts would be the same for both alternatives.

**MOTION:**

A Motion was made to recommend Alternative #3, the Overlay Plan, to the Arizona Corporation Commission.

***Consensus was reached on this Motion***

Consensus was reached to recommend Alternative #3, the Overlay Alternative, to the Arizona Corporation Commission as the Industry recommended Relief Plan for the 520 NPA.

The Meeting adjourned at 9:35 a.m., PDT.

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