



Director of the Division of Records and Recording
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0863

June 9, 2001

To Whom It May Concern:

**Position Paper Relating to:
Florida Area Codes Changes and NPA's**

990455-TL
990457-TL

Background:

The Public Service Commission is looking into a plan for the implementation of permissive and mandatory 10 digit dialing in the 954 and 561 area codes as soon as October 2001 as laid out in the North American Numbering Plan. The Local Exchange Companies (LEC's) have requested an immediate establishment date for implementation of the 10 digit dialing. This is due to the reported critical shortage of NNX's in both area codes.

In 1998 the PSC authorized an overlay plan for the 305 area code, and implemented a new area code, 786. The PSC allowed a six month permissive dialing period to allow customers to get used to the change, and to allow commercial companies such as security and computer companies to commence and complete the necessary changes in hardware that is dependant upon dialing a pre-established phone number. Because of the high population, and the concentration of both residential and commercial customers, security companies found themselves battling the clock to complete the changes. After much discussion and dialogue, the time frame was extended 3 months and then another 3 months. Not only were alarm companies affected by the change, but several other industries were as well.

For the majority of alarm companies, they had to contact each subscriber and schedule an appointment for a site visit to make the change required to the equipment. Other companies such as the telephone, beeper and cellular companies were simply able to make the changes with their central networks.

While several companies reported the ability to complete the transfer within the initial 6-month time frame, these were the exception rather than the rule. Several factors were involved including the fact that those companies were relatively new, had a small account base, and had used only the latest equipment that provided the ability to reprogram systems remotely via computer software from their offices.

Discussion:

The proposed permissive dialing period of six months is inadequate to allow the change to every security system dialer throughout the Broward (954) and Palm Beach (561) areas. It is not sufficient time to adequately serve any area code change anywhere in Florida.

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ALARM ASSOCIATION OF FLORIDA, INC.
1802 NORTH UNIVERSITY DRIVE #329
PLANTATION, FL 33322-4115
Ph (954) 748-7779 / Fx (954) 748-4749 / E-MAIL info@fla-alarms.org
Authorized DBPR Provider# 0001140
A Chartered State Association of the National Burglar & Fire Alarm Association

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Several types of industries will be affected by this change will be affected and consideration must be given to the impact on the populous of the county. Fire alarm companies, burglar alarm companies, elevator companies, fire alarm sprinkler companies, gate and access control companies will all be affected by this change. High-risk locations such as hospitals, emergency clinics, high-rise buildings (emergency elevator phones), government installations, military establishments will be affected, as well as residential, both single and multiple family and high-rise condominiums.

Alarm companies reported a shortage of "chips" that contain the telephone number programmed memory during the transfer of the 305/786 area code changes. According to numerous reports from manufacturers and suppliers, not only is there a shortage of the "chip" that needs to be replaced, but a shortage of programming equipment as well. Many of the systems are 15 to 20 years old, and still work perfectly. Customers will be forced into additional expenses to replace these systems simply because the programming chip is unavailable. This is not only costly, but time consuming. A system swap can normally take 4-8 hours on the average house, more in larger residential and commercial systems. Setting aside the logistical problem of reaching every subscriber and establishing an appointment for a site visit, the time it takes to reprogram a system is approximately than 1 hour.

Under option 1 that was filed by the LEC's, we agree with the plan to change EAS calls between 561 and 954 area code from 7 to 10 digit dialing now, and implement an area code change later. This will allow alarm companies time to make changes in this area now, and reduce the number of systems that will need to be replaced later. However, we would like to see the implementation of the permissive 10-digit dialing take place immediately. The public would not be inconvenienced, the telephone companies have the equipment and resources available to make this happen (it is merely a question of when it will happen), and everyone involved is permitted time to gear up for the change.

The PSC staff recommendation to implement a 60 and 120-day permissive and mandatory dialing program respectively is unacceptable (memorandum dated May 31, 2001). Sixty days to convert all of the devices within the 954 area code is simply insufficient. This will pose a hazard to all of the residences and businesses throughout Broward County. Life Safety will also be at risk because of the high number of fire alarms that transmit their emergency signal via telephone links to central monitoring facilities. Failure of any security company (burglar or fire) to transfer the programming could result in the loss of life if an emergency occurred. The same holds true for emergency telephones (primarily in elevators), which also dial a preprogrammed number. These devices normally do not have a dial on them, and are a single button push to initiate action. These devices are installed in compliance with the American's with Disabilities Act, and the Florida Accessibility Code.

Whether the PSC grants the LEC's permission to implement either of their plans for permissive and mandatory dialing, the security profession, and related professions will need a substantial permissive dialing period to ensure the safety of their subscribers, and to ensure the continued of all electronic systems.

Proposal:

The security profession is aware that the need for a change from 7 to 10 digit dialing is required, and agrees with it. But we ask that consideration be given to the magnitude of the situation and

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1802 NORTH UNIVERSITY DRIVE #329

PLANTATION, FL 33322-4115

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the logistical problems surrounding such a change. Therefore, the Alarm Association of Florida (AAF) is asking that the PSC implement the permissive dialing period immediately while further discussions with the LEC's continue as to implementation of the various 10 digit plans. Whether the plan is in sections (keeping EAS routes intact as 7 digit dialing) or in total, 60 days, even 6 months, is not sufficient, and this fact has been documented during the 305/786 change.

We recognize the need to enable more NNX's and to provide telecommunication services to all that request it. That is why we ask that the permissive dialing period commence immediately and that the security profession and others be allowed to commence with their programs for reprogramming their equipment now.

The AAF is asking that the PSC grant a one-year window from the date permissive dialing is enacted until mandatory 10-digit dialing is required. Any less may not enable security companies and others to make all of the necessary changes.

Approved:

Board of Directors of the Alarm Association of Florida, Inc.
June 8, 2001

For more information, contact

Bob Neely
Executive Director
Alarm Association of Florida, Inc.
1802 N. University Drive
Suite 329
Plantation, FL 33322-4115
954-748-7779



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