

State of Florida



Public Service Commission

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RECORDS AND REPORTING

DATE: JUNE 13, 2001

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF COMPETITIVE SERVICES (ILERI) *il* *AD* *CRB*
DIVISION OF LEGAL SERVICES (HELTON) *MAJ* *DK*

RE: DOCKET NO. 010614-TL - PETITION BY BELLSOUTH TELECOMMUNICATIONS, INC. FOR ORDER DIRECTING NORTH AMERICAN NUMBERING PLAN ADMINISTRATION (NANPA) TO DUPLICATE CERTAIN CENTRAL OFFICE CODES (NXX CODES) IN NEW 386 NPA IN CONNECTION WITH 904/386 NPA SPLIT ORDERED BY FLORIDA PUBLIC SERVICE COMMISSION FOR NORTHEAST PORTION OF FLORIDA.

DOCKET NO. 990517-TL - REQUEST FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 904 AREA CODE

AGENDA: 06/25/2001 - REGULAR AGENDA - PROCEDURAL MATTER - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\010614.RCM

CASE BACKGROUND

By Order No. PSC-00-1937-PAA-TL, issued October 20, 2000, in Docket No. 990517-TL, the Commission approved a geographic split relief plan¹ for the 904 area code. Subsequent to the Order, the North American Numbering Plan Administration (NANPA) issued 386 as the new area code for relief of the 904 area code.

¹The permissive dialing plan between the 386 (new area code) and 904 area codes began on February 15, 2001, and will become mandatory on November 5, 2001.

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FPSC-RECORDS/REPORTING

On January 21, 2001, NANPA received an e-mail from BellSouth Telecommunications, Inc. (BellSouth) requesting that 17 "oddball codes" in the 904 area code be duplicated and assigned to BellSouth in the 386 area code. The term "oddball codes" is not specifically defined by Federal Communication Commission (FCC) rules or Central Office Code (NXX) Guidelines. However, NANPA and many industry members use the term to refer to NXX codes that are considered throughout the industry as special use codes.

On February 1, 2001, NANPA responded to BellSouth's e-mail request stating that five of the seventeen codes are not eligible for duplication because they are not industry recognized "oddball codes". NANPA indicated that the codes were service specific NXX codes for BellSouth's internal customer needs. On April 26, 2001, BellSouth filed a petition requesting that the Commission issue an order to direct the NANPA to duplicate the five NXX codes in the 386 area code because these NXXs were used in the 904 area code. This recommendation addresses BellSouth's petition.

The Commission is vested with jurisdiction pursuant to Sections 364.01 and 364.16(4), Florida Statutes, and 47 U.S.C. §151, and 47 F.C.R. §52.15(g)(3)(iv).

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve BellSouth's petition to direct NANPA to duplicate five of BellSouth's specific 904 NXX codes in the 386 area code?

RECOMMENDATION: No. Staff recommends that the Commission deny BellSouth's petition to direct NANPA to duplicate five of BellSouth's service specific 904 NXX codes in the 386 area code. However, staff recommends that the Commission extend the permissive dialing period of only the 386 area code for the 203, 204, 440, 780, and 930 NXXs for approximately one year to enable BellSouth to make the necessary translational changes to its network, notice customers, and print the new service numbers in the phone books.
(ILERI)

STAFF ANALYSIS: In its April 26, 2001, petition, BellSouth states that it requested NANPA to duplicate certain "oddball codes" in the 904 area code to the 386 area code. Oddball codes are simply central office codes (or NXXs) that are used for special purposes. Before the 904 area code split, BellSouth used some NXXs that were business specific. After the 904 split, BellSouth wanted to retain these codes to cover the same geographic area as before the split.

Therefore, BellSouth requested NANPA to duplicate these codes in the 386 area code.

Oddball codes are used on a regional or national basis. BellSouth states, and NANPA agrees, that unlike ordinary NXX codes, "oddball codes" are not associated with specific rate centers since they can be national or regional in scope. For example, the 911 code is dedicated for emergency calling services available nationwide in every area code. On May 30, 2001, NANPA filed a response to BellSouth's petition. In its filing, NANPA identifies the following universal oddball codes:

| Oddball Code | Special Use |
|--------------|--|
| 211 | Community information and referral service |
| 311 | Non-emergency police and other governmental services |
| 411 | Local directory assistance |
| 511 | Travel information services |
| 611 | Repair service |
| 711 | Telecommunications Relay Service (TRS) |
| 811 | Business office |
| 911 | Emergency |
| 555 | Directory assistance |
| 700 | Intra-LATA preferred interexchange carriers (PIC) |
| 950 | Feature Group B access |
| 958 | Local plant test |
| 959 | Local plant test |
| 976 | Information delivery service |

BellSouth requested that NANPA duplicate 17 oddball codes. Of the seventeen "oddball codes" which were requested to be duplicated, BellSouth claims that five of the codes are "regional oddball codes" in Florida: 780 NXX code for BellSouth Official

Service²; 203 NXX code for ZipCONNECT service³ and Primary Rate ISDN [PRI]⁴ (Single Number Routing Option); 204 NXX code for AIN Toolkit Service⁵; and 440 and 930 NXX codes for Uniform Access Number⁶.

BellSouth claims that it needs these "oddball codes" to: 1) provide and offer various telecommunications services to existing and future customers, 2) avoid customer confusion, and 3) comply with the Federal Communication Commission's regulations. Staff understands BellSouth's position. However, the five "oddball codes" which BellSouth is requesting to be duplicated in the 386 area code are not national in scope, and not available to all carriers in the 386 area code.

Staff completed a thorough investigation to identify the importance of the oddball codes, how they are used by other carriers, and in what form. Staff examined not only BellSouth's telephone books, but also other incumbents' telephone books. Staff determined that the 780 code is used in most areas for BellSouth customers with disabilities, and customers ordering Cellular/Wireless Service and/or Paging Service from BellSouth. BellSouth uses the 557 code for home and small business services for the cities of Flomaton and Century. BellSouth also lists an 800 telephone number for BellSouth Business purposes, and for customers who are calling from a cellular phone or outside BellSouth's territory. Staff notes that other Incumbent Local Exchange Companies (ILECs) and Alternative Local Exchange Companies

² BellSouth states that the 780 code is listed in all Florida directories for contacting BellSouth Official Services, such as the Business Office to request various types of services. BellSouth claims that all customers, including alternative local exchange companies (ALECs) and their customers, can reach the BellSouth Business Offices by dialing numbers with the 780 NXX.

³ ZipCONNECT is a tariff offering that allows a subscriber with multiple locations, to advertise one number for its service and route calls to different locations depending upon criteria such as the time of day or the calling party's location.

⁴ PRI is a single number routing option tariff that is available to subscribers with extended reach service that enables the subscriber to publish a single telephone number for use within the entire BellSouth region.

⁵The AIN Toolkit Service is a tariff offering which allows subscribers (typically Internet service providers or enhanced service providers) to access certain call information and call processing capabilities in order to create customized telephone services for their end users.

⁶Uniform Access Number is a tariff that provides the customer with a uniform Business Line Telephone Number for client access to the customer's service.

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(ALECs) simply provide 800 telephone numbers to provide similar services as BellSouth does for its customers through the company internal codes.

On February 1, 2001, NANPA approved the duplication of 12 of the 17 "oddball codes." NANPA denied BellSouth's request to duplicate five of the "oddball codes" because they are not industry recognized "oddball codes." These codes are used for BellSouth internal customer needs. NANPA also denied the request because BellSouth did not submit Part 1 (NXX application) forms along with the required utilization and months-to-exhaust data per Section 3.2 of the Central Office Code Administrative Guidelines which state:

Central office codes (NXX) are a finite resource that should be used in the most effective and efficient manner possible. All applicants will be required to provide a completed Part 1 form and, for additional codes, quantitative support to demonstrate compliance with these guidelines. The quantitative information required for an additional code request is the "CO Code Assignment Months to Exhaust Certification Worksheet - TN Level" (Appendix B) or "CO Code Assignment Months to Exhaust Certification Worksheet - 1000-block Level" (Appendix G). The applicant should retain a copy in the event of an audit or regulatory initiative. (See Section 4.2.1)

A procedure is available to carriers who are denied codes. Addressing NXX code denials, 47 C.F.R. § 52.15(g)(3)(iv), states, in part:

The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state regulatory commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.

Staff agrees with NANPA's position that the five BellSouth codes are not industry recognized "oddball codes", they are simply company specific codes, which should not be duplicated in the 386 area code. Duplication of these codes for BellSouth's internal customer needs would tie up over 50,000 numbers. However, staff believes that BellSouth should be allowed time to make translation changes, notice customers, and print the new service numbers in the phone books.

BellSouth's 386 area code territory is indicated below in Figure 1 with new printing dates for the phone books:

| Cities | Area Code Shown on the Yellow Pages | Correct Area Code | Expected New Yellow Page Print |
|---|-------------------------------------|-------------------|--------------------------------|
| Daytona Beach, Deland, Deltona, DeBary, and Orange City | 386 | 386 | February, 2002 |
| Lake City | 904 | 386 | August, 2001 |
| Bunnell, Flagler Beach, and Palm Coast | 904 | 386 | February, 2002 |

Figure 1: BellSouth's 386 area code territory and expected printing dates of the yellow pages

Based on the information provided in Figure 1, staff believes that in order to allow sufficient time for BellSouth to make the necessary changes and utilize numbering resources more efficiently, the permissive dialing period for only the 386 area code for the 203, 204, 440, 780, and 930 NXX codes should be extended until all translation work is completed, customers are noticed, and new phone books are printed.

Staff notes that similar extensions were granted by the Commission for alarm companies in the 305/786 and 407/321 area codes overlays in PSC-98-1267-FOF-TL, issued September 23, 1998, and PSC-99-2335-FOF-TL, issued December 2, 1999, respectively. Staff believes that a timeframe of approximately one year for each of the regions is sufficient.

Figure 2 shows staff's recommended timeframes for BellSouth to make the necessary changes:

| Cities | Area Code | Maximum Allowed Timeframe |
|---|-----------|---------------------------|
| Daytona Beach, Deland, Deltona, DeBary, and Orange City | 386 | February, 2002 |
| Lake City | 386 | August, 2002 |
| Bunnell, Flagler Beach, and Palm Coast | 386 | February, 2002 |

Figure 2: BellSouth's 386 area code territory and maximum allowed timeframe to update BellSouth's yellow pages.

Based on the foregoing analysis and discussion, staff recommends that the Commission deny BellSouth's petition to direct NANPA to duplicate five BellSouth company specific 904 NXX codes in the 386 area code. However, staff recommends that the Commission extend the permissive dialing period of only the 386 area code for the 203, 204, 440, 780, and 930 NXXs for approximately one year to enable BellSouth to make the necessary translational changes to its network, notice customers, and print the new service numbers in the phone books.

ISSUE 2: Should these dockets be closed?

RECOMMENDATION: If the Commission approves staff's recommendation in Issue 1, these dockets should be closed. (HELTON)

STAFF ANALYSIS: These dockets may be closed if the Commission approves staff's recommendation in Issue 1.