

ORIGINAL

M E M O R A N D U M

January 26, 1999

TO: DIVISION OF RECORDS AND REPORTING  
FROM: DIVISION OF LEGAL SERVICES (COX) *WPC*  
RE: DOCKET NO. 980671-TL - Request for Review of Proposed  
Numbering Plan Relief for the 407 Area Code

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Attached is an email from "Argentna@aol.com" with attachment and PSC response (which was unable to be delivered "Mailbox Not Found") to be filed in the above-referenced docket.

WPC/slh  
Attachment  
cc: Division of Communications

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG \_\_\_\_\_  
LIN \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC   1   \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

01105 JAN 27 99

FPSC-RECORDS/REPORTING

STATE OF FLORIDA

Commissioners:  
JOE GARCIA, CHAIRMAN  
J. TERRY DEASON  
SUSAN F. CLARK  
JULIA L. JOHNSON  
E. LEON JACOBS, JR.



DIVISION OF LEGAL SERVICES  
NOREEN S. DAVIS  
DIRECTOR  
(850) 413-6199

## Public Service Commission

January 25, 1999

Mr. Argenta  
E-Mail Address: Argenta77@aol.com

**Re: Docket No. 980671-TL: Request for Review of Proposed Numbering Plan Relief for the 407 Area Code**

Dear Mr. Argenta:

Thank you for your January 11, 1998, E-mail letter to Chairman Joe Garcia regarding 407 area code relief. We truly appreciate your interest and willingness to work with the Florida Public Service Commission in this effort. I am responding to your letter because Chairman Garcia is prohibited by Chapter 350, Florida Statutes, from commenting on the merits of matters pending before the Commission.

As you may be aware, the Florida Public Service Commission conducted several public hearings for customers in the Orlando and Brevard County areas regarding the overlay plan for the 407 area code. Upon review of the record and the recommendation of the Commission's staff, the Commission voted on December 1, 1998, to adopt the staff recommendation whereby Brevard County would receive a new area code, and the new area code also would overlay the existing 407 area code in Orange, Seminole, and Osceola Counties. (See Order No. PSC-98-1761-FOF-TL) The Commission felt that this plan would keep the strongest communities of interest intact and provide the longest lives for the old and new area codes.

Mr. Argenta  
Page 2  
January 25, 1999

In addition, the Commission has opened a new docket, Docket No. 981795-TP, in an effort to address the issues that you raise in your letter regarding the Deltona area. The Commission's staff will conduct a workshop on Thursday, January 28, 1998, at 2:30 pm at the Deltona Community Center, 980 Lakeshore Drive, Deltona, Florida. We would greatly encourage your participation in this workshop.

We will place your letter as a comment letter in the docket file for this case. If you have any additional questions, please feel free to call me at (850) 413-6204, or Levent Ileri of the Commission's Division of Communications at (850) 413-6562. Thank you again for your interest in this matter.

Sincerely,

/s/ William Cox

William P. Cox  
Staff Counsel  
wcox@psc.state.fl.us

WPC/slh  
cc: Jorge Cruz-Bustillo  
I:/9817951-2.wpc

-----  
From: MAILER-D @ SMTP (Mail Delivery Subsystem) {MAILER-DAEMON@aol.com}  
To: Will Cox  
Subject: Returned mail: User unknown  
-----

===NOTE=====1/25/99==6:09pm=====

Return-Path: <>  
Received: from aolmbd03.mx.aol.com (205.188.156.77)  
by mail.psc.state.fl.us (Connect2-SMTP 4.30A.1000128)  
for <wcox@mail.psc.state.fl.us>; Mon, 25 Jan 1999 18:12:20 -0500  
Received: from rly-ya04.mx.aol.com (rly-ya04.mail.aol.com [172.18.144.196])  
by aolmbd03.mx.aol.com (8.8.8/8.8.5/AOL-2.0.0)  
with ESMTP id SAA16727 for <wcox@mail.psc.state.fl.us>;  
Mon, 25 Jan 1999 18:09:24 -0500 (EST)  
Received: from localhost (localhost)  
by rly-ya04.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0)  
with internal id SAA19194;  
Mon, 25 Jan 1999 18:09:22 -0500 (EST)  
Date: Mon, 25 Jan 1999 18:09:22 -0500 (EST)  
From: Mail Delivery Subsystem <MAILER-DAEMON@aol.com>  
Message-Id: <199901252309.SAA19194@rly-ya04.mx.aol.com>  
To: <wcox@mail.psc.state.fl.us>  
Subject: Returned mail: User unknown  
Auto-Submitted: auto-generated (failure)

The original message was received at Mon, 25 Jan 1999 18:09:21 -0500 (EST)  
from [207.156.28.3]

\*\*\* ATTENTION \*\*\*

Your e-mail is being returned to you because there was a problem with its  
delivery. The AOL address which was undeliverable is listed in the section  
labeled: "----- The following addresses had permanent fatal errors -----".

The reason your mail is being returned to you is listed in the section  
labeled: "----- Transcript of Session Follows -----".

The line beginning with "<<<" describes the specific reason your e-mail could  
not be delivered. The next line contains a second error message which is a  
general translation for other e-mail servers.

Please direct further questions regarding this message to your e-mail  
administrator.

--AOL Postmaster

----- The following addresses had permanent fatal errors -----  
<argentna77@aol.com>

----- Transcript of session follows -----  
... while talking to air-ya03.mail.aol.com.:

>> RCPT To: <argentna77@aol.com>

550 <argentna77@aol.com>... user unknown

----- Original message follows -----

Return-Path: <wcox@mail.psc.state.fl.us>  
Received: from mail.psc.state.fl.us ([207.156.28.3])

by rly-ya04.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0)  
with SMTP id SAA19182 for <argentna77@aol.com>;  
Mon, 25 Jan 1999 18:09:21 -0500 (EST)  
Received: from NetWare MHS (SMF70) by mail.psc.state.fl.us  
via Connect2-SMTP 4.30A; Mon, 25 Jan 1999 18:08:27 -0500  
Message-ID: <8FB2AC368175B9D1@mail.psc.state.fl.us>  
Date: Mon, 25 Jan 1999 18:08:00 -0500  
From: Will Cox <wcox@mail.psc.state.fl.us>  
Sender: Will Cox <wcox@mail.psc.state.fl.us>  
Organization: FPSC  
To: argentna77@aol.com  
Subject: 407 Area Code Relief  
Importance: normal  
MIME-Version: 1.0  
Content-type: text/plain; charset="US-ASCII"  
Content-disposition: inline  
Content-transfer-encoding: 7bit  
X-Mailer: Connect2-SMTP 4.30A MHS/SMF to SMTP Gateway

Mr. Argentna  
E-Mail Address: Argentna77@aol.com

Re: Docket No. 980671-TL: Request for  
Review of Proposed Numbering Plan  
Relief for the 407 Area Code

Dear Mr. Argentna:

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incereely,

/s/ William Cox

William P. Cox  
Staff Counsel  
Florida Public Service  
Commission                      wcox@psc.state.fl.us

---

From: ARGENTNA @ SMTP {Argentna77@aol.com}  
To: Joe Garcia, Julia Johnson, Susan Clark  
Subject: Fwd: 407 Area Code Relief

====NOTE=====1/11/99==9:32am=====99-0017 JAN 14

\*\* Message may be incomplete in this note due to:  
\*\* Message text too large  
\*\* Message text has too many lines  
\*\* The complete message is attached.

Return-Path: <Argentna77@aol.com>  
Received: from imol7.mx.aol.com (198.81.17.7)  
by mail.psc.state.fl.us (Connect2-SMTP 4.30A.1000128);  
Mon, 11 Jan 1999 09:32:15 -0500  
Received: from Argentna77@aol.com  
by imol7.mx.aol.com (IMOV18.1) id RDCVa03210;  
Mon, 11 Jan 1999 09:32:02 -0500 (EST)  
From: Argentna77@aol.com  
Message-ID: <a8ace735.369a0b62@aol.com>  
Date: Mon, 11 Jan 1999 09:32:02 EST  
To: jgarcia@psc.state.fl.us, sclark@psc.state.fl.us, jljohnso@psc.state.fl.us  
Mime-Version: 1.0  
Subject: Fwd: 407 Area Code Relief  
Content-type: multipart/mixed;  
boundary="part0\_916065124\_boundary"  
X-Mailer: AOL 4.0 for Windows 95 sub 205

-----[ Content-type: message/rfc822 ]-----  
From: Argentna77@aol.com  
Return-path: <Argentna77@aol.com>  
To: ghood@ci.orlando.fl.us, dammerma@ci.orlando.fl.us, bwyman@ci.orlando.fl.us,  
bgordy@ci.orlando.fl.us, bbagley@ci.orlando.fl.us,  
epage@ci.orlando.fl.us, chairman@citizens-first.co.orange.fl.us,  
district1@citizens-first.co.orange.fl.us,  
district2@citizens-first.orange.fl.us,  
district3@citizens-first.orange.fl.us,  
district4@citizens-first.orange.fl.us,  
district5@citizens-first.orange.fl.us,  
district6@citizens-first.orange.fl.us, svandergrift@ci.ocee.fl.us,  
Comait@aol.com, gwalker@co.seminole.fl.us, kbowlin@co.seminole.fl.us,  
dmerkt@co.seminole.fl.us, dcollett@co.seminole.fl.us,  
ahatch@co.seminole.fl.us, semcvb@ix.netcom.com, Dudleyb@altamonte.org,  
patriciaf@altamonte.org, bettyg@altamonte.org, hauckr@altamonte.org,  
eddier@altamonte.org, info@mpinet.net, terranova@ci-winter-park.fl.us,  
dltadm@mail.state.fl.us, guevara@osceola.org, arrington@osceola.org,  
shiple@osceola.org, smith@osceola.org, dunnick@osceola.org,  
brooks.bob.web@leg.state.fl.us, donley.johnnie@leg.state.fl.us,  
starks.bob@leg.state.fl.us, sublette.bill@leg.state.fl.us,  
trovillion.allen@leg.state.fl.us, reddick.alzo@leg.state.fl.us,  
constantine.lee@leg.state.fl.us, feeney.tom@leg.state.fl.us,  
posey.bill@leg.state.fl.us, bainter.stan@leg.state.fl.us,  
bronson.charlie.web@leg.state.fl.us, dyer.buddy.web@leg.state.fl.us,  
jennings.toni.web@leg.state.fl.us, webster.daniel.web@leg.state.fl.us,  
cowin.anna.web@leg.state.fl.us, johnson.randy@leg.state.fl.us,  
brummer.fred@leg.state.fl.us, John.Mica@mail.house.gov,  
fla15@mail.house.gov, bob\_graham@graham.senate.gov, frank@kissimmee.org  
Cc: Argentna77@aol.com  
Subject: 407 Area Code Relief  
Date: Mon, 11 Jan 1999 09:06:58 EST  
Mime-Version: 1.0

Content-type: text/plain; charset=US-ASCII

Content-transfer-encoding: 7bit

FORUM: An Overlay Area Code Implementation is Not Economically Appropriate for Central Florida.

#### Brief Overview of What an Overlay Is:

An overlay is a relatively new concept in area code relief. In its simplest form, known as a "general services overlay", a new area code is introduced into exactly the same geographic territory currently served by an existing area code. New prefixes from the new area code are assigned right alongside existing prefixes in the old area code. Existing numbers do not change. However, to minimize customer confusion, all calls within an overlay -- even local calls within the same area code -- must be dialed with the area code. Also, the possibility exists that two phone lines in the same building may have different area codes. This form of relief was used in 1997 for both area codes in Maryland. Overlays have been announced in several other areas and later converted to geographic splits; however, overlays are currently planned for 1998 in Colorado, Georgia, and New York, and other states are currently considering overlays.

#### Forms of an Overlay:

Multiple Overlay - In this form of an overlay, a new area code is introduced over exactly the same area covered by the exhausted area code.

Ex: 212/646 in Manhattan.

Concentrated Overlay - In this form of an overlay, a new area code is introduced over a major portion of the exhausted area code.

Ex: 305/786 in Dade County. The Florida Keys are excluded from the overlay.

Multiple Overlay - In this form of an overlay, a new area code is introduced in two or more exhausting area codes.

Ex: 404/770/678 in Atlanta Metro Area.

#### Overlay Implementation:

In a phased overlay, one type of service is assigned numbers from the overlay area code before other types of service, but eventually the overlay area code is used for all services.

#### Service Specific Overlays:

In a "service specific" overlay, one or more types of telephone service -- for example, all pagers and cellular phones -- in an existing area code are transferred to the new overlay area code. The FCC has ruled that "service specific" overlays may not be used in the U.S., with the exception that the wireless overlay area code 917 in NYC is grandfathered.

\*\*NOTE: The new overlay area code 646 in Manhattan will be assigned to all forms of service. This does include pagers and cellulars.

Number Portability - The term "number portability" means the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.

Current Number of Overlay Area Codes in Effect: 7

Colorado (Denver Metro Area) - 303/720 Maryland (Baltimore & Suburbs) - 410/443

Florida (Dade County) - 305/786 Pennsylvania (Philadelphia) -



215/267

Georgia (Atlanta Metro Area) - 404/770/678 Pennsylvania (Philadelphia Suburbs)

Maryland (Washington Suburbs) - 301/240 610/484

Current Number of Overlay Area Codes Approved by State PSC: 8

California (Los Angeles & Suburbs) - 310/424 Texas (Dallas & Suburbs) - 214/972/469

California (San Jose) - 408/669 Texas (Houston & Suburbs) - 281/713/832

Florida (Orlando & Suburbs) - 407/NA Virginia (Washington Suburbs) - 703/571

New York (Manhattan) - 212/646

New York (Brooklyn, Bronx, Queens, Staten Island) - 718/347

Number of Overlays Rejected: 10

Arizona (Phoenix Metro Area) - 602 (480) Louisiana (New Orleans/Baton Rouge)

Arizona (Phoenix Metro Area) - 602 (623) 504 (225)

California (San Diego Suburbs) - 619 (935) Minnesota (Minneapolis/St. Paul) - 612 (651)

California (San Diego Suburbs) - 619 (858) Missouri (Saint Louis) - 314 (636)

Florida (Tampa/St. Pete) - 813 (727) Nevada (Statewide) - 702 (775)

Illinois (Chicago Suburbs) - 847 (224) Texas (Austin/Corpus Christi) - 512

(361)

Kentucky (Louisville & SW Ky.) - 502 (270)

\*\*NOTE: Contrary to Florida Public Service Commission Announcements, the "overlay" option is very unfavorable. (Included below are arguments against the overlay option.)

(Each Statement Appears as Written):

Arizona (Regarding 602 Relief) - After numerous public hearings throughout the county (Maricopa), a professional consumer survey and the solicitation of written comments from the public, the ACC (Arizona Corpotation Commission) staff originally recommended that the commissioners adopt an area code overlay as the long term solution to the problem. (November 18, 1998 Overlay Recommended).

After receiving extensive public comment on the adoption of the overlay system, with public sentiment running over 80% in favor of a traditional geographic split, Commissioner Chairman Jim Irvin called for an official reconsideration of the original vote and additional public comment and consideration in support of the geographic split option. (December 10, 1998 Public Sentiment Expressed).

The Arizona Corpotation Commission, by a vote of two to one, has adopted a new area code plan for Maricopa County. The geographic split plan will assign the existing 602 area code to central Phoenix, with a second area code being given to the West Valley and a third going to the East Valley. Comissioner Chairman Jim Irvin noted that this final plan was the best possible solution the panel could adopt. "This not only gives each distinct area of the Valley a geograp

=====ATTACHED=FILE(S)=====

File(s):ORIGINAL.MSG

Detach to:G:\DETACH



242Send-to: JGARCIA . NW @ PSC  
2300Sender: ARGENTNA @ SMTP {Argentna77@aol.com}  
2000Message-encoding: IBM-437  
2000MCB-options: YNYNANA  
2200MCB-type: 0  
2100Date-posted: 11-Jan-99 9:32:52  
2200Error-report: 0  
2000MHS-id: 53C599368175B9D1  
O-SMTP-Date-posted: 11-Jan-99 9:32:21 -0500  
From: ARGENTNA @ SMTP {Argentna77@aol.com}  
To: JGARCIA @ PSC, SCLARK @ PSC, JLJOHNSO @ PSC  
Subject: Fwd: 407 Area Code Relief  
Date: 11-Jan-99 9:32:02 -0500  
Message-id: 91C499360175B9D1  
O-SMTP-Envelope-From: <Argentna77@aol.com>  
Via-host: PSC.PSC

Return-Path: <Argentna77@aol.com>  
Received: from imo17.mx.aol.com (198.81.17.7)  
by mail.psc.state.fl.us (Connect2-SMTP 4.30A.1000128);  
Mon, 11 Jan 1999 09:32:15 -0500  
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From: Argentna77@aol.com  
Message-ID: <a8ace735.369a0b62@aol.com>  
Date: Mon, 11 Jan 1999 09:32:02 EST  
To: jgarcia@psc.state.fl.us, sclark@psc.state.fl.us, jljohnso@psc.state.fl.us  
Mime-Version: 1.0  
Subject: Fwd: 407 Area Code Relief  
Content-type: multipart/mixed;  
boundary="part0\_916065124\_boundary"  
X-Mailer: AOL 4.0 for Windows 95 sub 205

-----[ Content-type: message/rfc822 ]-----  
From: Argentna77@aol.com  
Return-path: <Argentna77@aol.com>  
To: ghood@ci.orlando.fl.us, dammerma@ci.orlando.fl.us, bwyman@ci.orlando.fl.us,  
bgordy@ci.orlando.fl.us, bbagley@ci.orlando.fl.us,  
epage@ci.orlando.fl.us, chairman@citizens-first.co.orange.fl.us,  
district1@citizens-first.co.orange.fl.us,  
district2@citizens-first.co.orange.fl.us,

district3@citizens-first.orange.fl.us,  
district4@citizens-first.orange.fl.us,  
district5@citizens-first.orange.fl.us,  
district6@citizens-first.orange.fl.us, svandergrift@ci.ocoee.fl.us,  
Comait@aol.com, gwalker@co.seminole.fl.us, kbowlin@co.seminole.fl.us,  
dmerkt@co.seminole.fl.us, dcollett@co.seminole.fl.us,  
ahatch@co.seminole.fl.us, semcvb@ix.netcom.com, Dudleyb@altamonte.org,  
patriciaf@altamonte.org, bettyg@altamonte.org, hauckr@altamonte.org,  
eddierr@altamonte.org, info@mpinet.net, terranova@ci-winter-park.fl.us,  
dltadm@mail.state.fl.us, guevara@osceola.org, arrington@osceola.org,  
shipleym@osceola.org, smith@osceola.org, dunnick@osceola.org,  
brooks.bob.web@leg.state.fl.us, donley.johnnie@leg.state.fl.us,  
starks.bob@leg.state.fl.us, sublette.bill@leg.state.fl.us,  
trovillion.allen@leg.state.fl.us, reddick.alzo@leg.state.fl.us,  
constantine.lee@leg.state.fl.us, feeney.tom@leg.state.fl.us,  
posey.bill@leg.state.fl.us, bainter.stan@leg.state.fl.us,  
bronson.charlie.web@leg.state.fl.us, dyer.buddy.web@leg.state.fl.us,  
jennings.toni.web@leg.state.fl.us, webster.daniel.web@leg.state.fl.us,  
cowin.anna.web@leg.state.fl.us, johnson.randy@leg.state.fl.us,  
brummer.fred@leg.state.fl.us, John.Mica@mail.house.gov,  
fla15@mail.house.gov, bob\_graham@graham.senate.gov, frank@kissimmee.org

Cc: Argentna77@aol.com

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Mime-Version: 1.0

Content-type: text/plain; charset=US-ASCII

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-

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612 (651)

California (San Diego Suburbs) - 619 (858) Missouri (Saint Louis) - 314 (636)

Florida (Tampa/St. Pete) - 813 (727) Nevada (Statewide) - 702 (775)

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(361)

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After receiving extensive public comment on the adoption of the overlay system, with public sentiment running over 80% in favor of a traditional geographic split, Commissioner Chairman Jim Irvin called for an official reconsideration of the original vote and additional public comment and consideration in support of the geographic split option. (December 10, 1998 Public Sentiment Expressed).

The Arizona Corporation Commission, by a vote of two to one, has adopted a

new area code plan for Maricopa County. The geographic split plan will assign the existing 602 area code to central Phoenix, with a second area code being given to the West Valley and a third going to the East Valley. Commissioner Chairman Jim Irvin noted that this final plan was the best possible solution the panel could adopt. "This not only gives each distinct area of the Valley a geographic identity of its own, it provides the longest possible life for all three area codes, preserves seven digit dialing within area codes and eliminates toll calling between area codes."

Irvin and Commissioner Renz Jennings, who also supported the plan, noted that when the next area code relief is needed, most likely after 2005, the controversial overlay plan may meet less consumer resistance and probably would make better sense to alleviate number shortages at that time, after a geographic identity has been established. (December 18, 1998 Overlay Rejected, Geographic Split Adopted).

Solution: 3-way Geographic Split

California (Regarding 619 Relief) - The California Public Utilities Commission has stated that overlays would not be used to implement new area codes until several conditions were in place to mitigate the anti-competitive effects of overlays. First, we stated that mandatory 1+10 digit dialing must be in place by the time the overlay is implemented. Second, permanent Local Number Portability (LNP) must be fully deployed in the NPA subject to the overlay. Finally, all new customers who initiate service within an NPA after an overlay becomes operative must be assigned numbers from the "new" overlay area code; while existing customers would be able to receive additional lines at the same location served by numbers from the "old" area code to the extent that such numbers are available.

In its statements the commission stated, "The overlay approach would cause many difficult issues to arise such as the availability of permanent Local Number Portability - a system that let's consumers keep their phone numbers and all their calling features when they switch to another phone company, the assurance of an adequate supply of prefixes for competitive local carriers as required by the FCC, and mandatory 1+10 digit dialing on all calls in the overlay region. The commission found that these issues were particularly critical in the San Diego area where the success of new competitors with significant investments could be jeopardized by moving to an overlay.

Realizing that the overlay was less favorable to the public, the CPUC introduced a split in which the northern and eastern parts of the 619 area code would each receive their own area code, while the central portion (San Diego) maintaining the 619 area code.

Solution: 3-way Geographic Split

**\*\*Please Note:** Of the 27 area codes assigned in California, only two have been approved for overlays. The 408 area code (San Jose), which includes one county, which is a little smaller than Osceola County. The other is the 310 area code (Los Angeles Suburbs), which all falls within Los Angeles County and demonstrates no perfect geographic boundaries for a feasible split. This is also one of the fastest exhausting area codes in the nation today.

Kentucky (Regarding 502 Relief) - On August 18, 1998 the Kentucky Public Utilities Commission recommended that the 502 area code be assigned an overlay. In September, after hearing of the plan, public sentiment became evident against the overlay versus the traditional geographic split. After it became apparent that the overlay was not being accepted, the Commission held several public forums throughout the affected region in late October, resulting in the PUC reversing its decision as stated on November 16, 1998.

Persons commenting at the public meeting overwhelmingly supported a geographic split. For example, many business representatives noted resource limitations and the difficulty of implementing system modifications needed for ten-digit local dialing.

Also, the Federal Communications Commission (FCC) has recently decided to delay implementation of location number portability for an indefinite period of time. Location number portability was one of the factors in the Commission's initial decision to overlay the 502 area code.

**Solution: Geographic Split**

Missouri (Regarding 314 Relief) - As appeared in the Saint Louis Dispatch on August 13, 1998:

Lockheed Martin Corp. is refusing to assign a new area code for the Saint Louis area because a geographic split devised by Missouri officials runs afoul of guidelines for assigning new codes.

Missouri officials will seek to have Lockheed Martin's decision overturned next week at a meeting of the North American Numbering Council. The case would be the first to appear before the 28-member council which the FCC appointed two years ago.

The redrawn 314 area code would have enough telephone prefixes to last until 2012, while the area code covering the outer suburbs would have enough to last until 2045. Lockheed Martin, which administers area codes under a federal contract, says the plan does not meet its guidelines because there is more than a 15-year difference in the projected life spans of the proposed area codes.

Commissioner Harold Crumpton said Lockheed Martin wants the commission to use a "less-efficient option" that gives the 314 area code a projected life of eight years and the new area code an estimated 10-year life span. Crumpton called Lockheed Martin's actions shortsighted and insensitive. "To me, it doesn't add up," Crumpton said. "We're the one's who held the hearing, went around the state and got input from all the parties, read the records and cross-examined the witnesses." Crumpton said state officials, not a private company, should decide how to split the area code.

Solution: Geographic Split (Commission agrees with Missouri officials).

Illinois (Regarding 847 Relief)- As appeared in a newswire dated Sept. 17, 1998:

The Citizens Utility Board (CUB) Thursday renewed its call for state regulators to halt Ameritech's plans to impose a new area code in the region and it also asked the agency to fine companies that fail to return their unused numbers. In its legal brief with the Illinois Commerce Commission (ICC), CUB said its studies show that there are 4 million unused phone numbers in the 847 area code and that there is no need for a new area code any time soon.

Despite the huge surplus of numbers, Ameritech and the rest of the phone industry say they are running out of phone numbers and plan to impose a new, overlay code in 847 on Jan. 23. However, CUB's analysis shows there are enough phone numbers to avert the need for a new area code for at least four years. A CUB analysis of confidential number usage data, filed as formal testimony with the commission earlier this month, shows that the phone industry continues to hoard millions of phone numbers in 847, in defiance of an earlier ICC ruling that told companies to return their unused numbers.

However, CUB's study, the most comprehensive such study ever undertaken, shows that the industry has turned in less than 25% of its unused blocks of numbers. According to CUB's analysis, 1.6 million phone numbers should have been turned back in for circulation to the public immediately following the May ruling by the ICC. To date, less than 400,000 numbers have been returned.

"The phone industry continues to cling to its demand for a new area code, despite the mountain of evidence which shows that there are plenty of numbers left," CUB Executive Director Martin Cohen said. "We are confident the ICC will look at those facts and come to the same conclusion we have -- that there is no need for a new area code now or anytime soon." The ICC's May order told the phone industry to revamp the way it allocates phone numbers to phone companies and to assign numbers in blocks of 1,000 instead of 10,000. Phone companies were also told to return their unused blocks of phone numbers and to use up existing phone numbers before getting new ones.



CUB's report to the ICC shows that only 49% of the 7.92 million phone numbers available in 847 are actually in use by customers or otherwise unavailable. The wireline industry is using just 58% of the 5.2 million numbers it has on reserve, while the wireless industry is using just 42% of its 1.7 million. CUB is asking the ICC to block Ameritech from implementing the new area code until it can prove a real need for it. The consumer group is also asking the ICC to impose a fine of \$2,000 a day on phone companies that fail to return their unused phone numbers and to require phone companies to report their confidential number usage data to the commission on a quarterly basis.

Solution: In December 1998, Illinois Commerce Commission (ICC) ruled on behalf of Citizen's Utility Board and placed an indefinite hold on area code relief in the 847 Area Code.

#### Problems with Overlay Plan:

- Highly accepted by major local telephone companies, such as Bell South, Bell Atlantic, Ameritech and US West because it allows them to have a competitive advantage in the markets they serve, since they control a majority of the central office codes (prefixes).
- Diminishes competition between competing local carriers.
- Does not require that local number portability be mandated. Local Number Portability is an acceptable solution to maintaining the life-span of an area code beyond five years. This solution, would require all local telephone companies to make requests for Central Office Codes (prefixes) in terms of 1,000 assignments, rather than the 10,000 currently in place. This solution would preserve the number assignment system, while at the same time avoiding waste.

Ex: Each Central Office Code (COC) is assigned in terms of 10,000 numbers within one prefix. In most cases, not all 10,000 numbers are assigned within the prefix. Even the smallest communities, regardless of population, must be assigned a prefix if it falls within it's own exchange. To make this more explanatory, we will use the town of Apopka (est. pop. is 15,000). Apopka has 15,000 residents, yet has 10 different prefixes within its exchange. Under current procedures, Apopka has 100,000 different telephone numbers that could be assigned. This would be equivalent to 6,666 telephone numbers per person.

--- Results in incorrect information being disclosed by long distance carriers. In a recent independent study, I had selected 60 cities nationwide and tested long distance carriers on how accurate and up to date their area code information was. Here were the results (each carrier was tested twice):

AT&T - 81%  
31%

Sprint - 56%

MCI -

All three matched eachother only 22% of the time.

Here were the comments:

MCI - New York City:

States 3 area codes, but each area code was broken up into zones. Zone 1 was 212 and 917, Zone 8 was 718 and Zone 11-13 was 718. No operator could explain what the zones meant. (Independently, I concluded Zone 1 was Manhattan, Zone 8 was Staten Island, and Zone 11-13 was Bronx, Brooklyn, and Queens).

Laredo, TX - Told me that some numbers remained 210. (In actuality, 210 was the former area code and all numbers within an hour north or west from Laredo are 956).

Atlanta - Was told that Atlanta is so large, that you don't know which area code to use. Just call Directory Assistance. (In actuality, Atlanta is very small compared to most cities and if the representative inquired more about precisely where in Atlanta, then she could've been more helpful).

Birmingham, AL - Misquoted area code as 334 five times. (By far, the worst error I had recorded. Birmingham was never 334 in the past or present. The correct area code is 205).

Orlando - Was told that Orlando has two area codes, 407 and 561. When I told the operator I live in Orlando and that the information was not accurate, she continued to insist that Orlando indeed does have two area codes. (All of Orlando is 407).

Detroit - Was told that the 313 area code was replaced and no longer exists. (In actuality, the 313 area code does exist and it actually covers the whole city of Detroit).

Sprint - New York City:

Misquoted Manhattan as 718 and when I stated I believed it was not accurate, I was told to try it out for myself. I further continued to say I had no intentions of wasting my money on dialing a wrong number and insisted that she reverifiy. Operator stated, "It was my problem," and hung up. I called back and coincidently got the same operator three times in a row. By the fourth try I got a new operator who was able to give me the correct area code of 212.

Detroit - Was quoted five different area codes for Detroit (248, 313, 517, 616, and 734). Area code 616 alone is on the other side of Michigan. (Detroit is only 313).

AT&T - Anaheim, CA:

Was told that Anaheim's new area code was 949, when in actuality its area code is 714. Areas south of Anaheim had split to the 949 area code.

Newark, NJ - Was told that Newark was both 201 and 973. (In actuality,

Newark is only 973).

All three carriers -

Boston:

Three operators quoted Boston as having two area codes, 508 and 617. I found this peculiar since I knew that Boston was 617. By the third operator, I inquired why I was being quoted 508 along with 617. I learned that only one Boston prefix fell within the 508 area code, even though the whole city itself is 617.

--- Requires system modifications on a frequent basis. Home alarms and dialing systems must be modified to accept the new area code. Multiple area codes within a residence could even complicate the problem more.

--- Consumer Unfriendly. The overlay would require 1+area code+number on every call, regardless if it was in the same area code or not. The overlay also would create confusion to customers trying to find the exact area code, as witnessed above, it's hard enough. The overlay would also continue to replicate itself. With the 407 area code receiving an overlay, the overlay itself will eventually exhaust and then a third overlay would be implemented. Which means that by 2010 Orlando could have three area codes, while Deltona would have four and possibly five. NOTE: Later in 1999, NANPA will be making a request calling for relief in the 904 Area Code.

--- Economically Unfriendly. Regardless of which option is selected, there is certain to be economic drawbacks. But in comparison, the overlay outweighs the geographic split. Universal Studios has publicly commented that it does not support the overlay, while in contrast Disney does. The reason why Disney supports the overlay is simply because it controls enough numbers in the 407 area code, subsequently guaranteeing that it will not have to endure the overlay area code firsthand. In contrast, neither Universal Studios or Sea World control any numbers in the 407 area code. Like other consumers, they could find themselves operating under two area codes. The overlay also could confuse visitors who are not familiar with the dialing instructions. Unlike other states, the Florida Public Service Commission, has failed to educate those who will be affected by an overlay, through workshops and public forums. The anticipated overlay will serve as a surprise to many once it is implemented.

--- Wasteful and Confusing. The overlay is not the solution to exhaustion within area codes. In order to understand this more we must look at Atlanta. Last year Area Codes 404 and 770 were given an overlay area code of 678, thus mandatory 1+10 digit dialing was enacted. The North American Numbering Planning Administration (NANPA), is already recommending an overlay for the overlay itself for later this year. The final result would mean that Atlanta would have four different area codes by 2000. A similar situation is being planned for Dallas in 2000, even though its overlay has not even been activated yet. Overlays are also being planned for states like Maine and New Hampshire, where no more than 2 million possible numbers have been assigned,

even though each area code has the capability of assigning 8 million numbers.  
**THIS IS A WASTE AND THE STATE PSC KNOWS IT!!!!**

--- Not enough accurate data to determine whether or not an overlay is the reasonable solution. The overlay was first introduced in Maryland in 1997, as a nationwide test, not as a result of demand. To date, very few prefixes have been assigned to either overlay, and those that have are in the form of wireless communication. Both of the overlays in Pennsylvania were recently implemented. No prefixes have been assigned to the overlay in Colorado and the overlays in Georgia and Florida have only a few prefixes. It is my assertion that we must review concrete data which views overlays as the solution to future area code relief. The fact is simple, an overlay is just a geographic split, without the split. Same rules, same game. Therefore, the overlay has not worked and will not work in most instances. And at this time I would only recommend an overlay in an area, such as Manhattan and San Jose, where a geographic split would create confusing borders. (Manhattan, where a geographic split was highly debated, has streets which run parallel, meaning that some on Broadway would be in 212 and others in 646. While the overlay is confusing, this in itself made a geographic split even more confusing. San Jose, is one county, smaller than Osceola County, where more than 50% of the population falls within the city of San Jose borders).

Solution:

I recommend and advocate that the 407 area code be split by a three-way geographic split. While the borders would be similar to those presented by the Florida Public Service Commission, prior to the overlay being approved, they would require certain enforcements.

Here are the plans for area code relief that I ask the Public Service Commission to review and to withdraw its motion for the overlay implementation.

--- The 407 Area Code would remain within all Lake Buena Vista, Orlando, Reedy Creek and Windermere exchanges.

--- A new area code would be implemented for all of Brevard and Osceola Counties.

--- A new area code would be implemented in all of Seminole Country including portions of Orange County. Those portions of Orange County would include all exchanges in Apopka, East Orange, Ocoee, Winter Garden, and Winter Park.

--- Realignment would also be required. All of Deltona would appear in the new area code which would cover Seminole County, meaning that all residents residing in the 904 portion of Deltona would get the new area code as well.

In this process, only one prefix would have to be reassigned. Orange City would be transferred to the 904 area code and a new prefix would be assigned. Montverde in Lake County would be transferred to the 352 area code and a new prefix would be assigned. Tangerine would convert to an Apopka exchange, no new prefix would need to be assigned. (Realignment has been used several times and is used in a way to create geographic boundaries along a physical or

political arbitrary border. The most noticeable realignment transfer occurred when Bronx, NY was transferred from the 212 area code to the 718, in order to provide more central office codes (prefixes) for Manhattan).

--- With the split of the 407 area code, the Florida Public Service Commission would immediately implement Local Number Portability (LNP) and require of all local telephone companies to return any unused numbers. The Commission also would mandate a two year moratorium which would not allow any new prefixes to be assigned within the three area codes (407 and two new area codes). Any new numbers should come as a result of the number pooling. After the two years expire, numbers would be assigned in blocks of 1,000, rather than 10,000.

--- Mandatory dialing procedures would be implemented six months from the date of relief for the new area code covering Seminole County. For Osceola and Brevard Counties, mandatory dialing procedures would be given an additional three months, allowing adequate time for tourism officials to update all advertisements and other essential material.

--- All cellular phones would be grandfathered for a period of one year from the date of relief.

--- All calling rates would remain intact.

#### Why Geographic Relief:

The geographic relief, if implemented, as stated above, would provide greater relief to the 407 area code and prevent another area code relief from occurring five or seven years from now. This relief would essentially guarantee Brevard, Osceola and Seminole Counties from having to endure another area code split or overlay for a period of more than ten years. We also must realize that under this plan, no new prefixes would be assigned for a period of two years. The next relief essentially would be extended to at least, seven or eight years from now, at which time Orlando would probably exhaust its available prefixes. At this time an overlay would probably be more realistic and publicly acceptable.

#### What will the New Area Code Be:

Lockheed Martin Corp. has designated both the 448 and 665 as future area codes for 407. To date, neither has been publicly announced as relief for the 407 area code. My request is that the 448 Area Code be assigned to Brevard and Osceola Counties and that the 665 Area Code be assigned to Seminole County and East Orange.

#### Why the Overlay Plan is Essentially Wrong:

The overlay plan is "very" wrong mainly because the Florida Public Service Commission has failed to inform the public through mailings, newspaper coverage, TV coverage or other means. While it is true that the overlay plan was announced twice on TV and in the newspaper, at my last count, this is not acceptable. In California, the PSC requires that businesses and other customers be fully aware of the overlay plans and be prepared. In Florida, not one person I talked to, was aware of the overlay coming to Central

Florida. The overlay also is a very wasteful approach to area code relief, providing very little, to no relief. The Public Service Commission has not been honest to the consumers regarding the overlay, like the local telephone companies, they have used the excuse that an increase in cellulars, pagers, modems, fax machines, and additional lines in the home are the reasons why an area code split is necessary. The real reason is because large companies like Bell South and Sprint are buying Central Office Code (prefixes) in an accelerated rate, knowing very well that millions will go unused. The truth and fact is that the overlay plan is only supported by dominant local telephone companies, Lockheed Martin, and the Public Service Commission and the real truth is that the consumer rejects the overlay. In every overlay area code implemented, not one consumer group accepted it, and in areas where overlays were implemented, ex: Atlanta and Maryland, consumers were ill-informed. If we allow an overlay in the 407 Area Code, then consumers will pay a substantial price and at the rate of new area codes being introduced, the North American Number Planning Administration would probably call for relief in four years. Examples can be found in several areas: Sacramento and Charlotte where the area codes were split last year, yet relief is planned again in 2000, Nashville and Jacksonville where the area codes were split last year, yet relief is planned again this year. Finally, Austin where the area code will be split in March, yet another area code split has already been planned for 2001. Obviously, based on this data, Lockheed Martin and the local telephone companies have no intentions of conserving numbers and instead they will continue to waste at a much greater rate, than ever before.

I would appreciate any feedback or questions that raise concern. All information will be substantiated upon request. I would strongly request that each individual review what i have compiled and understand that my plan is by far the most feasible solution to date. Should you not agree with my plan please inform me so that I can address your concern. Should you agree with me please let me know, that way I know that I have reached someone's attention.