

NANCY B. WHITE  
General Attorney - FL

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

November 26, 2002

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

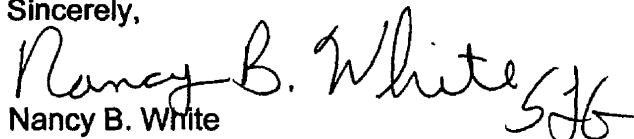
Re: Docket No. 021190-78  
Petition by BellSouth Telecommunications, Inc. Requesting  
the Commission Grant an Extension of Time to use the 780  
and 203 NXXs in the 386 and 772 NPAs as Oddball Codes

Dear Ms. Bayó:

Enclosed for filing is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the captioned "new" docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
Nancy B. White

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

13011 NOV 26 8

FPSC-COMMISSION CLERK

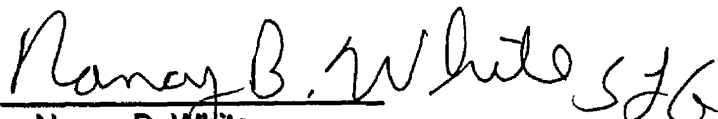
**CERTIFICATE OF SERVICE**  
**Petition by BellSouth Telecommunications, Inc. Requesting**  
**the Commission Grant an Extension of Time to use the 780**  
**and 203 NXXs in the 386 and 772 NPAs as Oddball Codes**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 26th day of November, 2002 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

NANPA  
Thomas Foley  
NPA Relief Planner  
820 Riverbend Blvd.  
Longwood, Florida 32779-2327

  
Nancy B. White

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**FLORIDA PUBLIC SERVICE COMMISSION**

Petition by BellSouth Telecommunications, Inc. ) Docket No. \_\_\_\_\_  
Requesting the Commission Grant an Extension )  
Of Time to use the 780 and 203 NXXs in the 386 )  
and 772 NPAs as Oddball Codes ) Filed: November 26, 2002  
\_\_\_\_\_ )

**MOTION FOR EXTENSION OF TIME**

NOW Comes, BellSouth Telecommunications, Inc. (“BellSouth”), who requests the Commission grant an extension as described in the body of this motion for the use of the 203 and 780 Oddball codes. Pursuant to Order Nos. PSC-01-1484-PCO-TL and PSC-01-2145-PCO-TL, BellSouth is required to return the Oddball Codes (203, 204, 440, 780, and 930) in the 386 and 772 NPAs to the North American Numbering Plan Administrator (NANPA) by March 31, 2003. BellSouth requests the Commission to allow BellSouth to continue to use the 203 and 780 Oddball Codes until July 31, 2003 and December 31, 2003, respectively. In addition, BellSouth requests the Commission to delay return of the 780 Oddball Code to NANPA until December 31, 2004. BellSouth does not believe any party will be prejudiced by this request.

**PARTY**

1. BellSouth is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.

## **BACKGROUND AND REQUEST FOR RELIEF**

### **904 Area Code Relief Proceeding**

2. On July 16, 2001, the Commission issued Order No. PSC-01-1484-PCO-TL. Pursuant to this order, the Commission granted BellSouth's petition to duplicate certain NXX codes (203, 204, 440, 780 and 930 known as Oddball Codes) in the 386 NPA until March 31, 2003. After that date, the Commission required BellSouth to return the NXX codes to NANPA for reassignment, pursuant to the Industry Numbering Committee (INC) Guidelines.

3. The basis for the Commission's decision was two-fold. First, other carriers didn't have access to these types of codes. Second, the use of these codes created an inefficient use of numbering resources. However, the Commission specifically stated that if BellSouth found it needed additional time to make the transition, it should seek relief so that the Commission could sufficiently review and rule on BellSouth's request prior to March 31, 2003.

### **561 Area Code Relief Proceeding**

4. On November 2, 2001, the Commission issued Order No. PSC-01-2145-PCO-TL that adopted the oddball code requirements set forth in Order No. PSC-01-1484-PCO-TL for the 561 NPA. Essentially, this order requires NANPA to duplicate the oddball codes in the 772 NPA, which was implemented to provide relief to the 561 NPA, pursuant to the same requirements as established for the 386 NPA.

### **Status of Oddball Codes in Florida**

5. Although the Commission has not required BellSouth to discontinue use of the oddball codes in all NPAs in Florida, BellSouth has committed to the Commission to work towards the discontinuation of the use of all oddball codes in Florida by March 31, 2003. As part of that commitment, BellSouth will be returning 32 NXXs codes (204, 440 and 930 codes oddball codes in Florida NPAs) to the North American Numbering Plan Administrator (NANPA), provided BellSouth doesn't reuse some of the codes as growth codes to meet customers needs consistent with the Industry Numbering Committee (INC) guidelines.

6. In addition, BellSouth is also working to discontinue the use of oddball codes throughout the region in an attempt to better utilize the NANPA numbering resources. Although this process has been more tedious and time consuming than originally expected due to BellSouth's regional effort and the nature by which the numbers were used and tracked, BellSouth has made significant progress in developing and implementing its plan to discontinue the use of these oddball codes.

### **Request Associated with 203 NXX**

7. On October 28, 2002, City Furniture requested the Commission to revise the date that BellSouth would discontinue the use of the 203 Oddball code in the 386 and 772 NPA from March 31, 2003 until July 31, 2003. As City Furniture discussed in its letter, they have invested heavily in advertising efforts to establish 203-CITY as a part of the City Furniture brand name and unfortunately will be unable to alter all of their

advertising, television and directories, as rapidly as the March date dictates. A copy of City Furniture's request is attached as Exhibit A.

8. In an effort to assist the Commission in resolving the complaint filed by City Furniture, BellSouth is willing to extend its discontinuance of the 203 Oddball code until July 31, 2003, if the Commission granted an extension for use of the code.

BellSouth believes extension of the use of the code will be easier to accomplish than merely placing an intercept on the City Furniture number, since an intercept would require BellSouth to read all 7 digits instead of the normal 3 digits.

9. Therefore, BellSouth requests the Commission grant BellSouth an extension of the deadline to discontinue the use of the 203 Oddball for the 368 and 772 NPAs code from March 31, 2003 until July 31, 2003.<sup>1</sup> This extension will allow City Furniture the necessary time to make advertising changes to another number such as an 800 number.

10. Since none of the Florida NPAs are currently in jeopardy, BellSouth does not believe the delay in returning the 203 NXXs in these NPAs will adversely impact the life of any area code.

#### **Request Associated with 780 NXX**

11. As the Commission is aware, BellSouth has used 780 throughout its Florida service territory for a considerable amount of time as its main contact number for customers to access BellSouth's business offices for such things as initiation of new service and applying for Lifeline and Link-Up programs.

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<sup>1</sup> BellSouth will extend all 203 NXXs in other BellSouth NPAs. All customers, except for City Furniture, will be discontinued as of March 31, 2003.

12. Although BellSouth has been working to comply with the Commission's March 31, 2003 deadline, the expansion of BellSouth's efforts to discontinue the use of 780 region-wide has delayed BellSouth's efforts to remove all of the 780 numbers from some directories in the 386 and 772 NPAs. As a result, there are 8 directories in these NPAs that will have 780 numbers referenced in the directories.<sup>2</sup> Beginning December 2, 2002 all new directories delivered will have 800 numbers instead of 780 numbers. BellSouth believes there may be some customer confusion and uncertainty as to what number to call for BellSouth Business offices. BellSouth believes this confusion and uncertainty is not in the best interest of the customers of Florida nor is it the intent of the Commission when requiring BellSouth to discontinue the use of the 780 Oddball Code.

13. Therefore, BellSouth is requesting the Commission to allow it to continue to use the 780 NXX in the 386 and 772 NPAs until December 31, 2003. In addition, BellSouth would request the Commission delay return of the 780 NXX in the 386 and 772 NPAs until December 31, 2004 in order to allow for an intercept that provides a reference of calls to the new 800 number.<sup>3</sup> This proposal will allow time to have new directories published with the 800 numbers and then provide a period of time customers will hear a reference to the new 800 numbers if they dial the old 780 numbers. BellSouth believes this approach is more customer friendly than other proposal considered.

14. Since none of the Florida NPAs are currently in jeopardy, BellSouth does not believe the delay in returning the 780 NXXs in these NPAs will adversely impact the

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<sup>2</sup> There are other directories in the other NPAs in the state that will also have 780 numbers referenced in the directories.

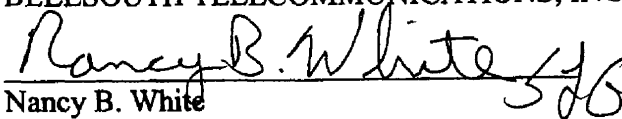
<sup>3</sup> BellSouth will extend all 780 NXXs in other BellSouth NPAs.

life of any area code. In addition, BellSouth does not believe BellSouth's proposal will adversely impact any carrier, since this code is used specifically as an access number for BellSouth customers and not as a service provided to customers in a competitive environment.

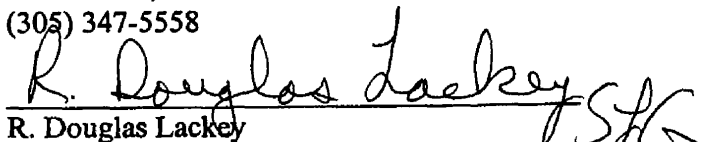
WHEREFORE, for the foregoing reasons, BellSouth respectfully request that this Commission grant the timeframes referenced above.

Respectfully submitted this 26th day of November, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
Nancy B. White

150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. Douglas Lackey

675 West Peachtree Street  
Suite 4300  
Atlanta, Georgia  
(404) 335-0747



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DIVISION OF  
COMPETITIVE SERVICES

October 28, 2002

Florida Public Service Commission  
Division of Competitive Markets & Enforcement  
Attn: Walter D' Haeseleer, Director  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Dear Mr. D' Haeseleer:

I am writing in response to a recent decision regarding telecommunications service. We were just informed by Bell South of the discontinuation of Zipconnect/Uniserv service. Presently, this service is scheduled for disconnection on March 31, 2003 without the possibility of call redirection. It is our understanding that the affected telephone numbers will be returned to and redistributed by the North American Numbering Plan Administration (NANPA).

For the last few years our marketing efforts have included the use of Zipconnect with the telephone number 203-CITY in all of the exchanges we occupy (i.e. 561, 954, 754, 305, 772 and 786). All of our advertising; television, newspaper, other print, and yellow pages includes this number as a convenient way for our South Florida customers to reach their local City Furniture showroom. We have invested heavily in advertising efforts to establish 203-CITY as a part of the City Furniture brand. We are very concerned that this decision was made without input from loyal customers such as ourselves, and we are even more concerned about the detrimental effect that the implementation date of this change will have on our customers and our business. Unfortunately, we are unable to alter all of our advertising as rapidly as this date dictates. Specifically, we have approximately 80 television commercials, all of which mention 203-CITY, which would have to be edited in a very short period of time. In addition, our yellow page advertising was just renewed without any providers mentioning this significant change. Many of these yellow page ads do not renew again until next July.

Absent a delay in the March 31, 2003 implementation date or another solution such as automatic call redirection for calls to 203-CITY, we will have many inconvenienced and dissatisfied customers. And dissatisfied customers will result in lost business. We believe there is probably a solution to this problem, and we need your assistance to resolve it. We are requesting a revised implementation date of July 31,

2003. Since time is of the essence, we would appreciate your immediate attention to this matter. We look forward to hearing from you soon.

Sincerely,

A handwritten signature in cursive script, appearing to read "Garry Ikola".

Garry Ikola  
Senior Vice President  
City Furniture

