



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED FPSC
03 JAN 23 AM 11:26
COMMISSIONER CLERK
[Handwritten initials]

DATE: JANUARY 23, 2003
TO: DIRECTOR, DIVISION OF THE COMMISSION ADMINISTRATIVE SERVICES (BAYO)
FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (ILERI, KELLY CASEY, BULECZA-BANKS) OFFICE OF THE GENERAL COUNSEL (TAYLOR, KNIGHT)
RE: DOCKET NO. 021190-TL - PETITION FOR EXTENSION OF TIME TO USE 780 AND 203 NXXs IN 386 AND 772 NPAs AS ODDBALL CODES, BY BELLSOUTH TELECOMMUNICATIONS, INC.
AGENDA: 02/04/03 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE
CRITICAL DATES: COMMISSION GRANTED EXTENSION FOR BELLSOUTH COMPANY-SPECIFIC ODDBALL CODES UNTIL MARCH 31, 2003
SPECIAL INSTRUCTIONS: NONE
FILE NAME AND LOCATION: S:\PSC\CMP\WP\021190.RCM

CASE BACKGROUND

On November 26, 2002, BellSouth Telecommunications, Inc. (BellSouth) filed a petition requesting that the Florida Public Service Commission (FPSC or Commission) grant an extension of time to use the 203 and 780 NXXs as oddball codes. Specifically, BellSouth requested that the 203 and 780 oddball codes remain active until July 31, 2003 and December 31, 2003, respectively. In addition, BellSouth requested that the Commission delay the return of the 780 oddball codes to NANPA until December 31, 2004 to allow an intercept message to be placed on it.

The term "oddball codes" is not specifically defined by Federal Communications Commission (FCC) rules or Central Office Code (NXX) Guidelines. However, the North American Numbering Plan

DOCUMENT NUMBER-DATE

00696 JAN 23 8

FPSC-COMMISSIONER CLERK

Administration (NANPA) and many industry members use the term to refer to NXX codes that are considered throughout the industry as special use codes.

The 203 NXX is the oddball code for BellSouth ZipCONNECT service. 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. The 780 oddball code is the NXX code for BellSouth service and is listed in all Florida directories. Some examples of industry recognized oddball codes are shown in the table below:

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

Historically, when an area code split took place during an area code relief process, it was customary that the oddball codes be duplicated in the new area code. When the 904 area code was split and the new 386 area code was introduced, Bellsouth requested that NANPA duplicate 17 oddball codes. NANPA duplicated 12 of the 17 BellSouth oddball codes and denied duplication of the other five codes because they were Bellsouth specific codes and not industry recognized oddball codes available to other carriers.

DOCKET NO. 021190-TL
DATE: JANUARY 23, 2003

On April 26, 2001, BellSouth filed a petition requesting the Commission to direct NANPA to duplicate the five denied codes in the new 386 area code. By Order No. PSC-01-1484-PCO-TL, issued July 16, 2001, in Docket No. 010614-TL, the Commission granted BellSouth's petition on a temporary basis, and directed NANPA to duplicate the codes until March 31, 2003, at which time these codes would be disconnected. The additional time was allowed to give BellSouth time to complete all translation work, notice customers, print new phone books, and provide BellSouth customers an alternative to the 203 oddball code.

By Order No. PSC-01-2145-PCO-TL, issued November 2, 2001, in Docket No. 990456-TL, the Commission adopted the oddball code requirements set forth in Order No. PSC-01-1484-PCO-TL, during the area code relief process for the 561 area code. This allowed the duplication of the BellSouth-specific oddball codes in the new 772 area code until March 31, 2003.

Although the Commission has only addressed BellSouth's use of oddball codes during area code relief proceedings for two area codes, BellSouth has committed to the Commission to work towards the discontinuation of the use of all oddball codes in all of Florida by March 31, 2003. This would allow approximately 320,000 numbers to be returned to NANPA for re-assignment.

Order No. PSC-01-1484-PCO-TL, and Order No. PSC-01-2145-PCO-TL, both stated that "If BellSouth finds it needs additional time to make the transition, it must seek relief so that we can sufficiently review and rule on its request prior to March 31, 2003."

This recommendation addresses BellSouth's petition concerning the extension of specific oddball codes.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission grant BellSouth's request to extend the use of the 203 oddball code until July 31, 2003?

RECOMMENDATION: Yes. Staff recommends that the Commission grant BellSouth's requests to extend the use of the 203 oddball codes until July 31, 2003. All 203 NXX codes should then be returned to NANPA on or before July 31, 2003. (ILERI, KELLY, CASEY, BULECZA-BANKS)

STAFF ANALYSIS: As stated in the case background, Order No. PSC-01-1484-PCO-TL allowed BellSouth to duplicate certain NXX 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. The basis for the Commission's decision was two-fold. First, other carriers did not have access to these types of codes, which presented an issue of competition. Second, the use of these codes created an inefficient use of numbering resources. A 10,000 number block was used to provide a handful of oddball code numbers.

In an effort to ease customer confusion, BellSouth stated in its petition that it is willing to extend the use of the 203 oddball NXX code until July 31, 2003, if the Commission grants an extension for use of the code. This extension will allow customers the necessary time to make advertising changes to another number such as an 800 toll-free number.

Staff believes that BellSouth had an extensive period of time to inform its customers that the 203 NXX would be discontinued. In staff's opinion, BellSouth had ample time to provide billing inserts and establish voice intercept messages to inform the customers of the pending number change. However, since the extension request is only for three months and will serve to benefit the customers, staff believes the request for the extension is reasonable.

Therefore, staff recommends that the Commission grant BellSouth's request to extend the use of the 203 oddball code until July 31, 2003. All 203 oddball codes should then be returned to NANPA on or before July 31, 2003.

ISSUE 2: Should the Commission grant BellSouth's request to continue the use of the 780 oddball code until December 31, 2003, and delay the return of the 780 oddball codes to NANPA until December 31, 2004?

RECOMMENDATION: Staff recommends that the Commission grant BellSouth's request to continue the use of the 780 oddball code until December 31, 2003. However, staff recommends that the Commission deny BellSouth's request to delay the return of the 780 oddball codes until December 31, 2004, and recommends that the 780 oddball codes be returned to NANPA on or before March 31, 2004. (ILERI, KELLY, CASEY, BULECZA-BANKS)

STAFF ANALYSIS: BellSouth states that it has been working to comply with the Commission's March 31, 2003 deadline to return all oddball codes. However, there are eight directories in the 386 and 772 NPAs that were published in August/September 2002 which still reference the 780 NXX numbers. The new 800 toll-free number will not be published in these directories until August/September 2003.

BellSouth requests that the Commission allow it to continue to use the 780 oddball code until December 31, 2003. Staff believes that this is a reasonable request since BellSouth is replacing all 780 NXXs in its Florida territory with 800 toll-free numbers.

BellSouth also requests that the Commission delay the requirement of returning the 780 oddball codes to NANPA until December 31, 2004, to allow an intercept message to be placed on the number directing consumers to the new 800 number.

Staff understands the potential customer confusion and uncertainty associated with a number change to reach a BellSouth business office. However, staff believes that keeping the 780 oddball code until December 31, 2004 is an excessive amount of time. A normal area code change usually includes only a six-month intercept message. Further, as in previous area code proceedings, the Incumbent Local Exchange Companies, such as BellSouth, inform the customers through media advertisements, billing inserts, and voice intercepts indicating that a number change would occur. Staff believes that this type of multiple noticing can also be accomplished for the 780 oddball code. Therefore, staff believes that a reasonable period of time to extend the return of the 780

DOCKET NO. 021190-TL
DATE: JANUARY 23, 2003

oddball codes to NANPA should be March 31, 2004, which would allow BellSouth to place a six-month intercept message on the 780 oddball code.

Based on the foregoing discussion, staff recommends that the Commission grant BellSouth's request to continue the use of the 780 oddball code until December 31, 2003. However, staff recommends the Commission deny BellSouth's request to delay the return of the 780 NXXs to NANPA until December 31, 2004, and recommends that the 780 oddball codes be returned to NANPA on or before March 31, 2004.

ISSUE 3: Should this docket be closed?

RECOMMENDATION: If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, these docket should be closed upon the issuance of a consummating order. (TAYLOR, KNIGHT)

STAFF ANALYSIS: At the conclusion of the protest period, if no protest is filed, these docket should be closed upon the issuance of a consummating order.