



Tracy W. Hatch
General Attorney

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (850) 577-5508
th9467@att.com

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FPSC - COMMISSION CLERK

August 14, 2015

Carlotta Stauffer, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 150151-TL Petition for Approval or 1+ 10-Digit Dialing For Walnut Hill and Molino, Florida Exchanges, by Frontier Communications of the South, LLC.

Dear Ms. Stauffer:

Enclosed for filing are the Comments of BellSouth Telecommunications, LLC d/b/a AT&T Florida in the above captioned docket.

Copies have been served to the Parties shown on the attached Certificate of Service list.

Sincerely,

s/Tracy W. Hatch

Tracy W. Hatch

cc: All Parties of Record
Elise R. Banister



Tracy W. Hatch
General Attorney

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (850) 577-5508
th9467@att.com

CERTIFICATE OF SERVICE
Docket No. 150151-TL

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

Electronic Mail this 14th day of August, 2015 to the following:

Charles W. Murphy
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No.: (850) 413-6191
cmurphy@psc.state.fl.us

Beth Keating
Gunster, Yoakley & Stewart
215 South Monroe St. Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Angie McCall
300 Bland Street
Bluefield, WV 24701
Angie.mccall@ftr.com

J.R. Kelly
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
KELLY.JR@leg.state.fl.us

s/Tracy W. Hatch
Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval or 1+ 10-Digit Dialing) Docket No. 150151-TL
For Walnut Hill and Molino, Florida Exchanges, by) Filed: August 14, 2015
Frontier Communications of the South, LLC.)

COMMENTS OF BELLSOUTH TELECOMMUNICATIONS, LLC
D/B/A AT&T FLORIDA

Pursuant to the Request for Comments, issued August 5, 2015 in the instant proceeding, BellSouth Telecommunications Inc. d/b/a AT&T Florida (“AT&T Florida”) hereby presents its comments regarding Frontier Communications of the South, LLC (“Frontier”) Petition to Implement 1+ 10-digit dialing in the Molino and Walnut Hill exchanges for all inter-numbering plan area (“inter-NPA”) calls.

Background

Frontier filed its Petition May 26, 2015 stating that the implementation of the 261 NNX in both the 850 and 251 NPAs will cause misrouting of local calls or failure to complete local calls dialed to the 261 NNX . Based on this, Frontier seeks to implement 1+ 10-digit dialing for all inter-NPA calling from Molino and Walnut Hill exchanges. Frontier supports the proposed change arguing that it would avoid customer confusion by allowing customers in the Molino and Walnut Hill exchanges to dial 1+ for all inter NPA calls, both local and toll.

AT&T Florida Comments

AT&T is unaware of any technical issues with implementing 1+ 10-digit dialing for inter-NPA calling from these exchanges. However, implementation of 1+ 10-digit dialing is inconsistent with the Commission’s previously established dialing plan developed by industry

and the Commission.¹ As reflected in Order No. PSC-96-0558, the Commission and the various members in the telecommunications industry believed it was important to have a uniform consistent dialing pattern across Florida not only for the industry but to minimize confusion for the customers. Listed below is the dialing pattern that resulted from Docket No. 960090-TP.

Intra Exchange Local	10-digits
Inter and Intra NPA EAS	10-digits
Inter and Intra NPA ECS or alternative toll plan	1 + 10 digits
Inter and Intra NPA toll	1 + 10 digits

As noted at the time, the Commission retained the 1+ dialing pattern for toll (“long distance”) calls because this dialing convention has traditionally been associated with toll calls and would be consistent with customers’ historic expectations that an additional charge would apply if you dialed a 1+ call. Retaining 1+ dialing for toll calls would avoid customer confusion inherent in changing the toll dialing convention.

Frontier indicates the need for the change was due to New Cingular Wireless (“NCW”) opening the 261 NNX code in Pensacola. NANPA assigns codes to carriers when additional numbering resources are needed. Essentially, NANPA reviews the dialing patterns and the numbers that are assigned to evaluate code conflicts. The fact that Frontier’s inter-NPA dialing for local calls from these exchanges were inconsistent with NANPA’s established dialing pattern is the reason that there is a code conflict with a code assigned in Alabama. Although, the change would not impact other carriers such as AT&T Florida, the Commission must determine if there is any impact to the consumers and the need to continue to work towards implementation of a consistent dialing pattern.

¹ See Order No. PSC-96-0558-FOF-TP issued April 25, 1996 in Docket No. 960090-TP.

Granting Frontier's Petition would be a departure from the Commission's established plan. It is likely that Frontier's proposal will create as much confusion as it might avoid since it would require customers to know which 1+ dialed call is a toll call and which is a local call. Granting the Petition should require a compelling showing that justifies departure from the Commission's established dialing pattern plan.²

Respectfully submitted this 14th day of August, 2015.

BELLSOUTH TELECOMMUNICATIONS, LLC
d/b/a AT&T FLORIDA

s/ Tracy Hatch
TRACY W. HATCH

675 W. Peachtree Street., NW
Room 4324
Atlanta, GA 30308
(404) 927-5291
th9467@att.com

Attorney for BellSouth Telecommunications, LLC
d/b/a AT&T Florida

² While it can be said that "consistency is the hobgoblin of small minds," in this instance, consistency and uniformity of dialing patterns for carriers is essential in providing clear easily understood calling services to customers regardless of which carrier serves them or from where they call.