

State of Florida



FILED SEP 03, 2015  
DOCUMENT NO. 05523-15  
FPSC - COMMISSION CLERK

## Public Service Commission

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

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**DATE:** September 3, 2015

**TO:** Office of Commission Clerk (Stauffer)

**FROM:** Office of Telecommunications (Beard, Casey) *cm* *BJT* *pm*  
Office of the General Counsel (Murphy)

**RE:** Docket No. 150151-TL – Petition for approval of implementation of 1+10-digit dialing for Walnut Hill and Molino, Florida exchanges, by Frontier Communications of the South, LLC.

**AGENDA:** 09/15/15 – Regular Agenda – Proposed Agency Action - Interested Persons May Participate

**COMMISSIONERS ASSIGNED:** All Commissioners

**PREHEARING OFFICER:** Brown

**CRITICAL DATES:** None

**SPECIAL INSTRUCTIONS:** None

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### Case Background

On May 26, 2015, Frontier Communications of the South, LLC. (Frontier) filed a Petition for Approval of Mandatory 1+10 Digit Dialing for the Walnut Hill and Molino Exchanges. Frontier is a Florida Public Service Commission (Commission) certificated local exchange telecommunications company which serves the Walnut Hill and Molino Exchanges in Escambia County.

On June 10, 2015, staff sent a data request to Frontier seeking additional information on Frontier's proposal. Frontier provided responses to the data request on June 25, 2015.

On August 5, 2015, staff sent an e-mail Notice to all potentially affected communication carriers in the Frontier service area. The Notice described Frontier's proposal, provided a link to the

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proposal on the Commission website, and advised that any written comments should be submitted to the Commission by August 14, 2015. In addition, on August 6, 2015, a Florida Administrative Register (FAR) Notice was published seeking information on how Frontier's dialing proposal may affect other Florida communication carriers and customers, if at all. The FAR notice also stated that written comments should be submitted to the Commission by August 14, 2015.

On August 14, 2015, BellSouth Telecommunications, LLC d/b/a AT&T Florida (AT&T), filed comments addressing Frontier's proposed dialing pattern change. On August 21, 2015, Frontier filed a letter amending its original Petition to request mandatory 10-digit dialing instead of mandatory 1+10 digit dialing.

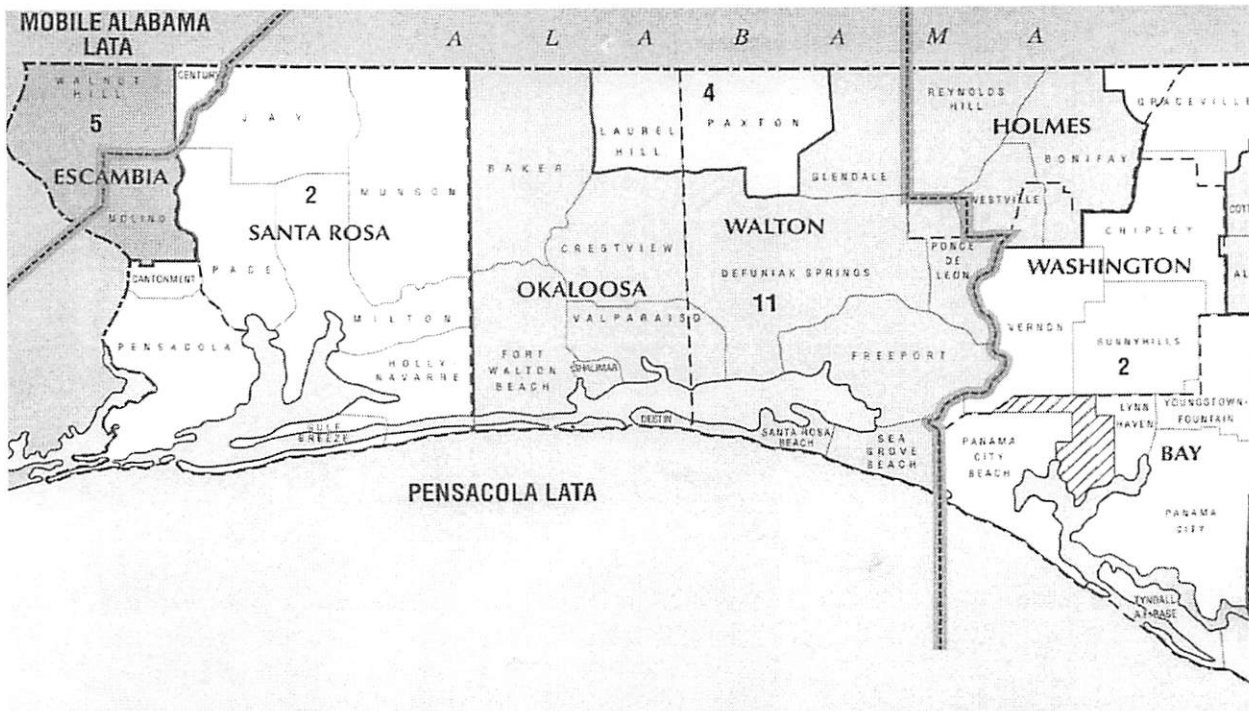
The Commission has jurisdiction to address these issues pursuant to Section 364.16(7), F.S., and 47 C.F.R. §52.19.

### Discussion of Issues

**Issue 1:** Should the Commission approve 10-digit Mandatory Dialing for the Walnut Hill and Molino exchanges?

**Recommendation:** Yes, staff recommends that the Commission approve 10-digit Mandatory Dialing for the Walnut Hill and Molino exchanges. (Beard, Casey)

**Staff Analysis:** Frontier currently serves certain exchanges in northwest Florida, including the Molino exchange, which is in Escambia County, as well as the Walnut Hill exchange, which is just north of the Molino exchange.



At present, both Pensacola, Florida and McCullough, Alabama are included in the local calling area for Frontier's customers in the Walnut Hill, Florida exchange. As such, customers in the Walnut Hill exchange utilize 7-digit dialing when making calls to both Pensacola and McCullough.

North American Numbering Plan<sup>1</sup> numbers are ten-digit numbers consisting of a three-digit Numbering Plan Area (NPA) code, commonly called an area code, followed by a seven-digit local number. The format is usually represented as:

**NXX-NXX-XXXX**

<sup>1</sup> The North American Numbering Plan (NANP) is an integrated telephone numbering plan serving 20 North American countries that share its resources. AT&T developed the North American Numbering Plan in 1947 to simplify and facilitate direct dialing of long distance calls. Implementation of the plan began in 1951.

where N is any digit from 2 through 9 and X is any digit from 0 through 9.

Frontier has learned that a wireless communication carrier recently opened the codes 251-261 in McCullough, Alabama and 850-261 in Pensacola, Florida. Frontier believes that when the wireless communication carrier actually begins offering service, 261 numbers in either the 850 area code or the 251 area code, calls from Frontier customers in Walnut Hill may not properly translate.

As an example, a customer in Walnut Hill, FL (850-327) may attempt to reach a business in McCullough, AL by dialing a 7-digit number as the customer has in the past. If the business has been assigned a number, such as 261-1234, that call to the business in McCullough may not complete, or it may be sent to a potentially identical number in Pensacola, FL, because 261-1234 also belongs to a customer in Pensacola, FL. Since Walnut Hill currently has 7-digit dialing into both McCullough and Pensacola, this is a very likely scenario due to the wireless communication carrier opening 261 number blocks in both areas. The same would be true if a customer in Walnut Hill (850-327) is contacting a friend or family member in Pensacola, FL and dials 261-7890. Because Pensacola is included in the customer's local calling area, along with McCullough, AL, the call may not be completed or may be switched to McCullough, AL, to a customer with that number. If, however, the customer were required to also dial the area code when placing a call, the call would properly translate to the appropriate switch and ultimate destination.

Frontier anticipates imminent problems with call routing in this area, as well as associated customer confusion and frustration. Therefore, Frontier asks in its Amended Petition to Implement 10-digit Mandatory Dialing in the Walnut Hill exchange. Because of the close proximity and community of interest between Molino and Walnut Hill, Frontier anticipates that applying the dialing requirement to both exchanges will reduce confusion that could otherwise arise because of notifications to just one of these exchanges. Customers in the Walnut Hill and Molino exchanges would not incur any change in calling rates.

Frontier proposes to provide customer awareness, notification and education by following similar requirements as with an area code split or overlay. The proposed notification would include, but not be limited to, the following:

- Newspaper release advising of the upcoming requirement
- Bill Inserts or direct mail to all existing customers in Walnut Hill and Molino, Florida
- 30-day permissive period before mandatory 1 + 1 0-digit dialing
- At end of the permissive period, customers will be routed to a recording stating they must dial a "1 +the area code" when making local calls outside the state of Florida.

The Commission anticipated potential dialing problems in this area during the area code 904 relief addressed in Docket No. 961153-TL. By Order No. PSC-97-0138-FOF-TL, issued February 10, 1997, the Commission stated the following:

We have considered whether there would be a need to change interNPA dialing patterns. If the new NPA code results in routes with interNPA seven-digit dialing, a change to ten-digit dialing may be necessary on those routes.

On August 14, 2015, BellSouth Telecommunications, LLC d/b/a AT&T Florida (AT&T), filed comments addressing Frontier's proposed dialing pattern change. AT&T stated that it is unaware of any technical issues with implementing 1+10-digit dialing for inter-NPA calling from these exchanges. However, AT&T noted that implementation of 1+10-digit dialing is inconsistent with the Commission's previously established dialing plan developed by industry and the Commission. Historically, in the state of Florida, 1+10 digit dialing has been earmarked to indicate to consumers they are making a toll call. By Order No. PSC-96-0558-FOF-TP, issued April 25, 1996, in Docket No. 960090-TP, the Commission set the following dialing patterns.

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

In staff's June 10, 2015 data request, staff advised Frontier that historically in Florida, 1+10 dialing has been reserved for calls which incur toll charges, and asked why Frontier believes it should use 1+10 dialing instead of just 10-digit dialing. Frontier responded that it is not opposed to the implementation of 10-digit dialing, as opposed to 1+10 digit dialing. On August 21, 2015, Frontier, after engaging in discussions with AT&T regarding its comments, amended its original Petition. The Amended Petition confirms Frontier's willingness to implement 10-digit dialing for the Walnut Hill and Molino exchanges, as opposed to 1+10 digit dialing as originally requested. In addition, Frontier represents that AT&T does not oppose Frontier's amended request to implement 10-digit dialing.

AT&T was the only communication carrier which submitted comments in this docket. No public comments from consumers were received. It appears that a change in the dialing pattern to 10-digit mandatory dialing in the Walnut Hill and Molino exchanges will not have any significant effect on either providers or consumers. Therefore, staff recommends that the Commission approve Frontier's Amended Petition for 10-digit Mandatory Dialing for the Walnut Hill and Molino exchanges.

**Issue 2:** 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, this docket should be closed upon the issuance of a consummating order. (Murphy, Casey)

**Staff Analysis:** 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, this docket should be closed upon the issuance of a consummating order. At the conclusion of the protest period, if no protest is filed this docket should be closed upon the issuance of a consummating order.