

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Tuesday, July 03, 2018 8:26 AM
To: 'aerdmann@uneeus.com'
Cc: Consumer Contact
Subject: FW: Further Comments for Docket 20180118-TL

Good Morning Mr. Erdmann,

We will be placing your comments below in consumer correspondence in Docket No. 20180118 and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

Sincerely,

Toni Hover
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6467

-----Original Message-----

From: aerdmann@uneeus.com [<mailto:aerdmann@uneeus.com>]
Sent: Tuesday, July 03, 2018 8:00 AM
To: Records Clerk
Subject: Further Comments for Docket 20180118-TL

After having filed comments in this docket, I was contacted by Staff in part to explain what I meant by my proposal regarding returning the 55 321-NNX codes to Brevard County. These comments are to better explain what I seek, both now and in a future Docket.

In PSC-1999-0056-FOF-TL issued on 1/06/1999, this Commission granted 381 of the NXX's from the then new 321 Area Code for the exclusive use of Brevard County Rate Centers, with the remaining available 321-NXX's to be used for area code relief for the 407 area code.

When the Original 689 order was entered by the PSC, as well as the order that suspended the implementation of the 689 Area Code Overlay PSC-2002-0743-FOF-TL, a freeze was placed on any Non-Brevard rate centers receiving any numbers from the 321 Area Code, and also ruling that any 321-NXX returns were only to be provided to Brevard County rate centers.

When I discovered and reported to both NANPA and the PSC the fact that 55 321-NXX's had been issued to Non Brevard Rate centers in violation of the PSC's Order by NANPA, it was impossible to do anything about it at that moment, since the number of 407-NXX's remaining was less than 55.

I am asking for 3 things to be done by the PSC, to ensure that Brevard County has the originally ordered 381 321-NXX's available for its use, such that 7 digit dialing can continue in Brevard as over 1000 people speaking or submitting comments to the original 321 Area Code public hearings requested. It is clear that a majority of Brevard residents that

submitted comments did NOT want anything to do with Overlays, Ten digit dialing or being associated with the Orlando Metro Area.

The first thing has already been done by the PSC, who has already ruled and this proposal makes clear that any returns of 321-NXX prefixes will be reserved exclusively for Brevard County.

The second thing that I request as part of the 689 NPA order is that the 55 321-NXX prefixes that were inadvertently assigned after the Freeze order for Brevard be reserved at this time in the new 689 overlay for future action by the PSC regarding recovery of the numbers for Brevard. This action would do nothing right now to the current holders of the 55 321-NXX numbers. It would allow a future orderly reclamation of these numbers for Brevard County. Reclamation would take place in the future by an area code change for these 55 prefixes to the 689 Area Code. This would allow Brevard rate centers use of these prefixes in the future.

The third thing would be part of a future docket. This would to move all of these 55 prefixes to the 689 area code, splitting them back into the 321 Brevard Area code. Based on current projections, this would not have to be done until 3 years or so before 689 would be set to exhaust, although it could be done sooner. This would give some amount of time for some of the 55 321-NXX's to be returned thru natural reclamation, reducing customer impact. We could allow for a 1 year permissive period, followed with an additional 1 year of intercept recording telling the caller that the area code has been changed. Based upon predictions of need by Brevard, and the future 689 exhaust date, there is plenty of time for such a long transition period.

Albert Erdmann
Cocoa FL