



**Robert O. Strobel**  
Market General Counsel – North East  
100 Southgate Parkway  
Morristown, NJ 07960  
973-656-7328 (o)  
973-656-7420 (f)  
rob.strobel@verizonwireless.com

February 15, 2017

Honorable Kathleen H. Burgess  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

**Re: Case 16-C-0297 – 518/838 NPA Overlay**

Dear Secretary Burgess:

In response to the February 7, 2017 letter from LuAnn Scherer, Acting Director, Office of Consumer Services, Verizon Wireless provides its updated customer outreach and education plan for implementation of 518/838 overlay. This plan supersedes what was previously filed on October 12, 2016 in compliance with the Commission's September 15, 2016 Order in this proceeding.

On September 15, 2016, the Commission issued an order in this proceeding approving an area code overlay for the 518 area code region. The Commission rightly noted that the overlay alternative is less disruptive to customers, and more likely to enhance the public interest than other alternatives. The overlay does not require any customers to change their telephone numbers, but requires that they dial the area code for all local calls, including calls within the same area code. In the order, the Commission directed all service providers holding numbering resources in the 518 area code to develop their outreach and education plans to inform their customers of the overlay and the new area code, and to file those plans with the Commission within 45 days of the order.

On September 28, 2016, NANPA convened the industry to discuss the implementation of the overlay, to set the implementation dates in compliance with the Commission's order, and to discuss development and execution of the customer education plan. Because the 518 area code was projected to exhaust in 3Q2017 and was in jeopardy, the Commission order recognized and the industry agreed that the implementation timeframe would have to be accelerated to ensure the continued availability of numbering resources to service providers and their customers. The industry agreed to the following 11-month implementation schedule:

- October 15, 2016: Start of network preparation and customer education
- March 18, 2017: Start of permissive 10-digit dialing and continued customer education
- August 19, 2017: End of permissive 10-digit dialing and Start of mandatory 10-digit dialing
- September 19, 2017: Effective date of the new 838 area code (earliest central office code activation date)

Since October 2016, Verizon Wireless has participated in the Industry Implementation Committee and will continue to do so. Verizon Wireless has taken guidance from that committee's recommendations to guide its outreach and education efforts, and has begun communicating the following key messages to its customers:

- The new 838 area code will "overlay" and serve the same geographic area as the 518 area code
- The overlay will require customers to dial or enter the area code and 7-digit number for all calls, including calls within the same area code
- Anyone with a 518 telephone number is affected
- Telephone numbers, including the current area code, will not change
- The price of a call, coverage area, rates and services will not change due to the overlay
- Calls considered local now will remain local calls, regardless of the number of digits dialed

- Dialing 311, 811, 911 or other 3-digit services will not be affected; those calls will still complete with just 3 digits.
- The key implementation dates:
  - Beginning March 18, 2017, customers with a 518 area code should begin entering the area code and telephone number whenever placing calls within the 518 area code. If they forget and use just seven digits, their calls still will be completed.
  - Beginning August 19, 2017, customers with a 518 area must enter the area code and telephone number whenever placing calls within the 518 area code. If they forget and use just seven digits, their calls won't be completed and a recording will instruct them to hang up and dial again.
  - Beginning September 19, 2017, new telephone lines or services may be assigned numbers with the 838 area code.
- Customers should prepare for the overlay by:
  - Updating any pre-programmed 7-digit phone numbers in their mobile devices to include the area code, as well as any text or email alert services, and any call forwarding services
  - Re-programming any services and devices that use a 7-digit phone number to include the area code, including automatic dialing equipment. Some examples include life safety systems and medical monitoring devices, fire or burglar alarm and security systems, security gates, speed dialers, call forwarding settings, fax machines, internet dial-up numbers, and voicemail services or similar functions.
  - Checking their websites, personal or business checks and stationery, contact information, advertising materials, personal and pet ID tags and other such items to ensure the area code is included.

Verizon Wireless has begun and will continue to implement the following customer education initiatives to inform its customers about the new dialing procedure and the new 838 area code in the 518/838 overlay area:

- In January 2017, Verizon Wireless began training its customer-facing organizations about the new overlay area code and the relevant implementation dates associated with the transition to mandatory 10-digit dialing.
- In January 2017, Verizon Wireless updated its website ([www.verizonwireless.com/518overlay](http://www.verizonwireless.com/518overlay)) to provide specific information about the new overlay area code, including the date for the start of the permissive 7- or 10-digit dialing period, details about the new 10-digit dialing procedure, the date for the start of mandatory 10-digit dialing, and when telephone numbers with the new 838 area code may be assigned.
- During its February 2017 bill cycle, Verizon Wireless is notifying its customers of the new overlay area code and the new 10-digit dialing procedure through its monthly invoice.
- During its July 2017 bill cycle, Verizon Wireless will again notify and remind its customers of the new overlay area code and the new 10-digit dialing procedure through its monthly invoice.
- During July and August 2017, Verizon Wireless will notify and remind its customers of the new overlay area code and the new 10-digit dialing procedure through text messaging.
- During August 2017, Verizon Wireless will remind its customer-facing organizations about the new overlay area code and the upcoming implementation of mandatory 10-digit dialing.

Please contact me at the above number or David Hayes at (518) 396-1043 if you have any questions. Thank you.

Respectfully submitted,



Robert O. Strobel

cc: LuAnn Scherer  
Erin O'Dell-Keller