

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 07-C-1486 - Proceeding to Investigate and Evaluate Options
for Making Additional Central Office Codes
Available in the 315 Area Code Region.

NOTICE INVITING COMMENTS ON STAFF WHITE PAPER

(Issued March 3, 2008)

By Order issued December 20, 2007, the Commission instituted this proceeding to investigate and evaluate options for making additional central office codes available in the 315 area code region. The Commission's goal is to develop a plan that minimizes disruption and inconvenience to customers while ensuring continued availability of telephone numbers beyond 2010 in the 315 area code region.

Before the Commission reaches any decision regarding the best method of providing area code relief, it is essential that telecommunications service providers, consumers, businesses, and other interested parties located in the area have an opportunity to express their views. To structure that process, the Department of Public Service Staff has prepared a White Paper that outlines several options for 315 area code relief. The Commission is releasing the Staff White Paper for public comment. A copy of the White Paper is attached to this Notice. In addition, the White Paper can be examined on the Commission's web site, at www.dps.state.ny.us. (From Home Page, click on the AskPSC.com links and look for 315 Area Code case; alternatively, access the File Room and search by Case Number.)

Comments in response to the Staff White Paper are invited from interested parties. As described in the White Paper, the case will solicit public input through other methods, including public hearings, educational forums, and informal

letters, e-mails and calls to the Commission's toll-free Opinion Line available to consumers.

Any party desiring to submit formal comments on the White Paper should do so by filing five copies with the Honorable Jaclyn A. Brillling, Secretary, New York State Public Service Commission, Three Empire State Plaza, Albany, New York, 12223-1350 on or before March 26, 2008. All comments must be served upon the parties on the Active Parties List maintained for this case, which will be posted on the Commission's website. Reply comments will be entertained only to the extent they are strictly limited to and responsive to matters raised in initial comments. Reply comments must be filed with Secretary Brillling and served on the Active Parties on or before April 4, 2008.

Anyone desiring to be an Active Party should submit full contact information - name of party, name of representative, mailing address, telephone and facsimile numbers, and e-mail - to Jacquelynn Walen, secretary to Acting Chief Administrative Law Judge Elizabeth H. Liebschutz, at jacquelynn_walen@dps.state.ny.us or 518-474-4520 before March 14, 2008, so that the Active Party List can be posted prior to the deadline for service of comments. Any party willing to receive comments by electronic means only, waiving the receipt of written mailed comments, should so indicate at the time of the request to be on the Active Parties List.

(SIGNED)

JACLYN A. BRILLING
Secretary

AREA CODE RELIEF FOR
CENTRAL NEW YORK

A DESCRIPTION OF OPTIONS

CASE 07-C-1486

Prepared by
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Department of Public Service

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February 27, 2008

**STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE**

**AN OPTIONS PAPER FOR AREA CODE RELIEF IN
CENTRAL NEW YORK**

BACKGROUND

The 315 area code that has served central New York since the early 1950s is running out of assignable telephone numbers, and implementation of a new area code is necessary. Demand for central office codes in central New York is expected to result in the depletion of these codes by late 2010. Therefore, Commission action is necessary to ensure the continued availability of telephone numbers in the area currently served by the 315 area code. The Commission's goal is to provide long-term area code relief while causing the least possible disruption to consumers and businesses in the area.

The following counties are served by area code 315, in whole or in part: Cayuga, Chenango, Cortland, Fulton, Hamilton, Herkimer, Jefferson, Lewis, Madison, Oneida, Onondaga, Ontario, Oswego, Otsego, Seneca, St. Lawrence, Wayne and Yates. The purpose of this paper is to present what the Staff of the New York State Department of Public Service (DPS Staff) believes are the four best options for providing additional telephone numbering resources for central New York. The Department of Public Service, through the Administrative Law Judge (ALJ) assigned to this case, is seeking comment from telecommunications providers and the general public on the area code relief options outlined in this Paper. Following the comment period, public outreach sessions, and public hearings, the ALJ will present recommendations to the Commission for its final decision.

The views contained in this Paper are DPS Staff views and have not been reviewed by the Commission. It is expected that recommendations to the Commission on providing area code relief in the 315 region will be made by early summer, and that the Commission may make a determination in this matter in mid-2008. This timeframe will allow sufficient time for the telephone companies to make the necessary network changes and to permit customers to get used to new dialing patterns before the new area code is fully implemented. The Commission may approve any of these options, a modified version of these options, or

entirely different plans. Regardless of the option that is ultimately adopted, consumer rates will *not* be affected.

DISCUSSION

A telephone number has ten digits and is composed of three parts: a three-digit Numbering Plan Area (NPA), or area code; a three-digit NXX or central office code; and a four-digit station number (i.e., 315 555-1212). Three-digit central office codes are assigned to specific geographic areas, or rate centers, within each NPA. These central office codes cannot be used elsewhere within the NPA, nor can seven-digit telephone numbers (NXX code plus individual station number) be assigned to end-users outside of their home rate center.

Approximately 656 of the 792 central offices codes available for assignment in the 315 area code have already been assigned to telecommunications carriers, leaving only 136 NXX codes available for assignment as of October, 2007. Each NXX code contains approximately 10,000 assignable seven-digit telephone numbers. Of the approximate 8 million assignable seven-digit telephone numbers in the 315 area code, approximately 2.7 million are currently in use.¹

In areas where number exhaust has been predicted, new area codes in a given geographic area are generally provided in either of two ways: an overlay² or through a geographic split of the existing area code. In 1999, the 315 NPA was projected to be in exhaust (out of assignable NXX codes) by 2002, and the North American Numbering Plan Administrator (NANPA)³ prepared several options, including an overlay and four geographic splits, for consideration by the telecommunications industry. In December 1999, after reviewing the options, the industry group petitioned the Commission for approval of an overlay relief plan. However, before any further action was taken on a relief plan, several numbering conservation efforts were implemented, such as reclamation of underused NXX codes and pooling of numbers, and the projected exhaust date was subsequently revised to the third quarter of 2010.

¹ Many numbers assigned in low-growth rate centers are never used since they cannot be used outside of that rate center. This results in a large under-utilization rate of available numbers within the area code. Pooling telephone numbers in under-used exchanges has helped to alleviate some of this problem.

² An overlay option means that one new code is used throughout the entire geographic area for all new telecommunications services; existing phone numbers generally are not affected. A more complete description is discussed on page 5 of this Paper.

³ Among the many number administration duties assigned to it by the Federal Communications Commission, the North American Numbering Plan Administrator oversees area code relief planning.

While the telecommunications industry originally recommended that an overlay code be implemented, and an overlay code remains a valid option, geographic splits are also discussed in the Industry Numbering Committee's Area Code Relief Planning Guidelines⁴, and, therefore, Staff has formulated three geographic split options which are individually described in detail in the following sections. DPS Staff requests that the industry and the general public provide comment concerning each of the options, including which area should retain the 315 area code under any of the geographic split options.

PROPOSED OPTIONS

GEOGRAPHIC SPLITS - Options 1, 2 and 3

Description

A geographic split would divide the existing 315 code area into two geographic areas, leaving the existing area code to serve one portion and assigning a new area code to the remaining portion. Where this method has been used, the line drawn between the areas has often followed a clearly identifiable jurisdictional, natural, or physical boundary, such as town and county boundaries, and bodies of water.

Staff has formulated three different approaches to splitting the 315 area code on a geographic basis, taking into consideration the projected life⁵ of the area codes (exhaust dates) on each side of the proposed split and communities of interest within the geographic area. Attachment 1 contains information pertaining to each of these options, including two maps for each option; one showing county and town boundaries, and the other showing county and rate center boundaries.

(a) Option 1

The first geographic split option would divide the existing area code into two geographic areas along rate center boundaries, in a general direction east to west. Under this scenario, the following areas would fall below the proposed boundary and would constitute one area code:

⁴ ATIS-0300061, issued January 19, 2007. The Industry Guidelines do not permit the splitting of rate centers in favor of other kinds of geographic splits such as county boundaries, however a federal waiver can be requested, and such waivers have, in fact, been granted in past proceedings in New York.

⁵ Staff has used two different methods of calculating the projected life of the codes, one of which produces a more conservative number. The use of both methods provides an estimated range, as shown on the pages in the Attachment.

- The existing 315 sections of Yates, Seneca, Cortland, Chenango, Madison and Ontario Counties;
- The greater portions of Wayne, Cayuga and Onondaga Counties; and
- Small portions of Oneida and Otsego Counties.

All of the remaining area north of this line would be located in the other proposed area code.

(b) Option 2

The second geographic split option would divide the existing area code into two geographic areas *along rate center boundaries* in a general north to south direction. Under this scenario, the following areas would fall to the west of the boundary:

- The existing 315 sections of Yates, Seneca, Wayne, Cayuga, Onondaga and Ontario Counties;
- The greater portion of Oswego County; and
- A small portion of Oneida and Madison Counties.

All territory east of this line would be located in the other area code.

(c) Option 3

The third geographic split option would divide the existing area code into two geographic areas *along county boundaries* in a general north to south direction, and is similar to Option 2. Under this scenario, the following territory would fall to the west of the boundary:

- The existing 315 Area Code sections of Yates, Seneca, Wayne, Ontario, Cayuga, Cortland, Onondaga and Oswego Counties.

All territory east of this line would fall on the other side of the boundary.

Advantages of a Geographic Split

- A geographic split would retain the identification of certain locales with a single area code, thereby avoiding the potential confusion associated with the use of multiple area codes in a single neighborhood, building, or even household or business.
- A geographic split does not require all central New York consumers to dial 11 digits within the same area code. Customers would continue to dial seven digits within their respective area code.

Disadvantages of the Geographic Split

- Approximately half of the currently-assigned telephone numbers belonging to the estimated 1.5 million population living in the 315 area code, including numerous businesses, would be required to adopt a new area code, including the need to change advertising and other materials which contain their telephone number.
- Thousands of wireless customers who would be located in the new area code would have to bring their wireless devices to their service providers for reprogramming with the new area code.
- Future area code exhaust could require additional splits to smaller and smaller areas without clearly recognizable geographic boundaries.
- Consumers would be required to dial an area code for approximately half the numbers that were previously dialable on a seven-digit basis.

OVERLAY PLAN – Option 4

Description

An overlay plan assigns a new area code to a given geographic area. Area code relief is provided by opening up a new code throughout the geographic area of the existing code, in effect, “overlying” it. Central office codes from the new area code are assigned as needed on a carrier-neutral (i.e., first-come, first-served) basis for new service requests. Existing customers (wireline or wireless) are not required to change their area codes or seven-digit telephone numbers.

The overlay plan provides long-term area code relief, avoids any forced number or area code changes for existing customers, and is easily replicable. Current projections indicate that a single overlay for Central New York would provide area code relief for an estimated range of 23 to 28 years (2033 to 2038).⁶

If an overlay code is adopted, current Federal Communications Commission regulations require 10-digit dialing⁷ within the geographic area of the existing code (i.e., any call made in the current 315 area would now require dialing an area code).⁸ This regulation is

⁶ Since an overlay does not require the formulation of specific geographic boundaries, there are no accompanying maps in the attachment to this paper associated with this option.

⁷ Use of the prefix "1" (1+NPA+NXX-XXXX) would result in 11-digit dialing, to comport with the New York State Dialing Plan.

⁸ FCC rule 47 CFR 52.19 (c)(3)(ii).

intended to provide a more level playing field among carriers competing in the same geographic region. In many ways, the advantages and disadvantages of the overlay are a mirror image of those associated with a geographic split.

Advantages of the Overlay

- An overlay code avoids the need for any current customers to change their area code.
- An overlay is easily replicable; if required, additional relief overlay area codes could be implemented relatively simply. Consumers would not be required to change their area code as central New York continues to grow.
- The overlay would spare thousands of wireless customers from having to bring their wireless devices to their service provider for reprogramming with a new area code.

Disadvantages of the Overlay

- Some consumers may believe it is inconvenient to have to dial 11 digits on all calls.
- Consumers may be confused by having to dial area codes to reach telephone numbers located nearby, in the same building or neighborhood, for example.

CONSUMER OUTREACH AND EDUCATION

During the course of the proceeding, DPS Staff will conduct a comprehensive public information and involvement program. The objectives will be to inform affected consumers of the need for new area codes in central New York, receive feedback on consumer preferences regarding the alternatives presented in this White Paper, and to otherwise hear comments related to the need for another code in the region. That effort includes information about the 315 case on the AskPSC.com website, sending mailings to targeted stakeholders in the affected counties, and providing information at meetings and events. DPS Staff will also schedule informational forums prior to public statement hearings which will be held in various locations in central New York during the Spring of 2008. The public statement hearings will be held by the Administrative Law Judge and will provide an opportunity for the public to comment on a formal, transcribed record. Specific dates, times and locations of the public statement hearings will be provided by Notice published on the Department's website and disseminated through mailings and press releases.

In addition to speaking at a public statement hearing, consumers may comment in several other ways:

1. By writing a letter addressed to Jaclyn A. Brillling, Secretary, New York State Public Service Commission, 3 Empire State Plaza, Albany, New York 12223-1350;
2. By calling the PSC's toll-free Opinion Line (1-800-335-2120) and leaving a comment on the recording; or
3. By commenting online at www.AskPSC.com.

All comments should reference the "315 Area Code Case" and/or "Case 07-C-1486." All of these comments will become part of the formal record in the case.

CONCLUSION

This Paper states no preference as to the method of providing area code relief (i.e., split or overlay) in central New York. Comments are sought from all those affected, including residents, businesses and organizations in the region, on the proposals contained herein as well as on which geographic area should retain the existing 315 code in the event a geographic split is adopted. This feedback will be used to make an informed recommendation to the Commission.

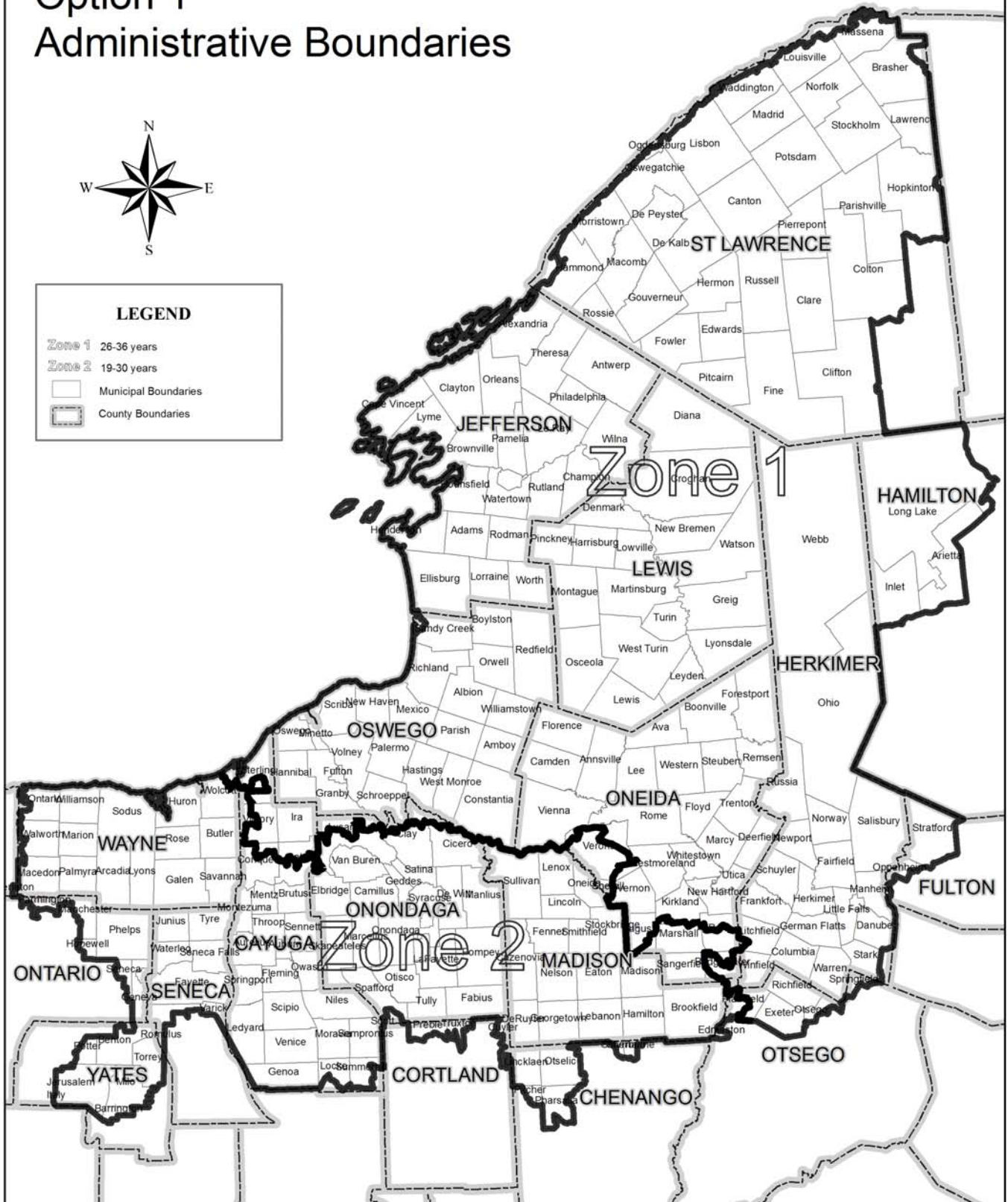
Area Code 315

Option 1 Administrative Boundaries



LEGEND

- Zone 1 26-36 years
- Zone 2 19-30 years
- Municipal Boundaries
- County Boundaries



Area Code 315

Option 1 Rate Center Boundaries



**AREA CODE 315
OPTION NO. 1 - SPLIT BY RATE CENTERS¹**

AFFECTED LOCAL CALLING FROM ONE SIDE TO THE OTHER (32 TOTAL):

<i>FAIRHAVEN <> RED CREEK</i>	<i>SYRACUSE <> CATO</i>
<i>CATO <> WEEDSPORT</i>	<i>SYRACUSE <> HANNIBAL</i>
<i>CATO <> BALDWINSVILLE</i>	<i>SYRACUSE <> LYSANDER</i>
<i>LYSANDER <> BALDWINSVILLE</i>	<i>SYRACUSE <> FULTON</i>
<i>PHOENIX <> BALDWINSVILLE</i>	<i>SYRACUSE <> PHOENIX</i>
<i>PHOENIX <> LIVERPOOL</i>	<i>SYRACUSE <> MEXICO</i>
<i>CENTRAL SQUARE <> LIVERPOOL</i>	<i>SYRACUSE <> CENTRAL SQUARE</i>
<i>CENTRAL SQUARE <> CICERO</i>	<i>SYRACUSE <> PARISH</i>
<i>SYLVAN BEACH <> ONEIDA</i>	<i>SYRACUSE <> PULASKI</i>
<i>SYLVAN BEACH <> CANASTOTA</i>	<i>SYRACUSE <> WILLIAMSTOWN</i>
<i>KNOXBORO <> ORISKANY FALLS</i>	<i>SYRACUSE <> CONSTANTIA</i>
<i>KNOXBORO <> MADISON</i>	<i>SYRACUSE <> CLEVELAND</i>
<i>CLINTON <> WATERVILLE</i>	<i>SYRACUSE <> SYLVAN BEACH</i>
<i>UTICA <> WATERVILLE</i>	<i>UTICA <> CLAYVILLE</i>
<i>UTICA <> ORISKANY FALLS</i>	<i>UTICA <> LEONARDSVILLE</i>
<i>VERNON <> ONIEDA</i>	<i>WEST WINFIELD <> LEONARDSVILLE</i>

COUNTY BOUNDARIES SPLIT (5 TOTAL):

*CAYUGA
ONEIDA
ONONDAGA
OTSEGO
WAYNE*

TOWN BOUNDARIES SPLIT (12 TOTAL):

*BRIDGEWATER
CATO
CLAY
CONQUEST
LYSANDER
PARIS
PLAINFIELD
STERLING
VERONA
VICTORY
WESTMORELAND
WOLCOTT*

¹ Information contained in this attachment concerning rate center, town and county boundaries, as well as local calling between rate centers, was gathered using information shown in tariffs and from various mapping software. Considering the exact physical location of each and every telephone subscriber in the 315 area code, there may be slight differences to the information shown in this attachment for some subscribers.

Area Code 315

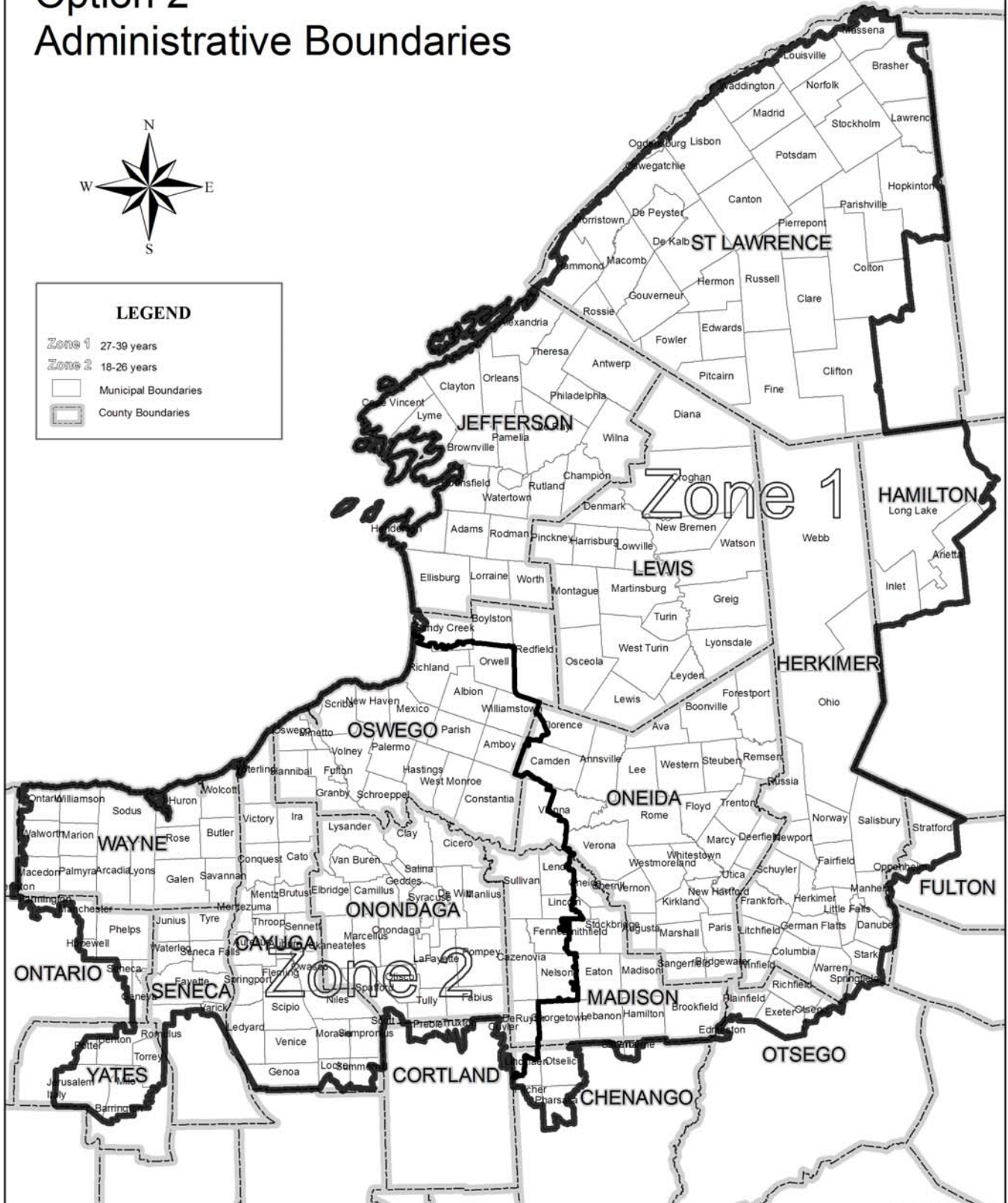
Option 2 Administrative Boundaries



LEGEND

Zone 1 27-39 years
Zone 2 18-26 years

□ Municipal Boundaries
▭ County Boundaries



Area Code 315

Option 2 Rate Center Boundaries



LEGEND

Zone 1 27-39 years
Zone 2 18-26 years

□ Rate Center Boundaries
▭ County Boundaries



**AREA CODE 315
OPTION NO. 2 - SPLIT BY RATE CENTERS**

AFFECTED LOCAL CALLING FROM ONE SIDE TO THE OTHER (6 TOTAL)

*SANDY CREEK <> PULAKSI
WILLIAMSTOWN <> CAMDEN
SYLVAN BEACH <> CANASTOTA
SYLVAN BEACH <> SYRACUSE
WILLIAMSTOWN <>CAMDEN
CANASTOTA <> ONIEDA*

COUNTY BOUNDARIES SPLIT (4 TOTAL):

*MADISON
OSWEGO
ONEIDA
ONONDAGA*

TOWN BOUNDARIES SPLIT: (5 TOTAL)

*FLORENCE
LINCKLAEN
LINCOLN
SANDY CREEK
VIENNA*

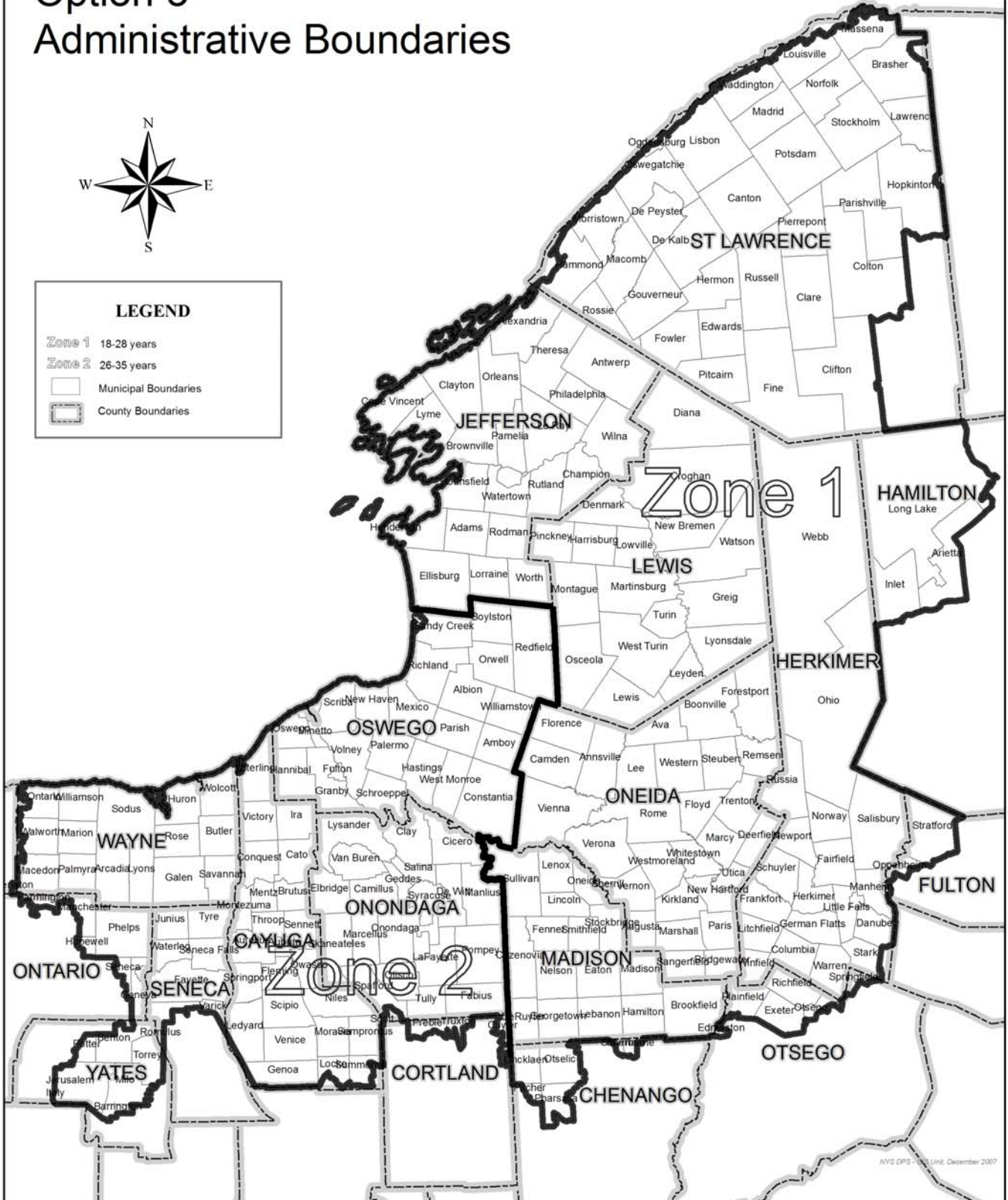
Area Code 315

Option 3 Administrative Boundaries



LEGEND

- Zone 1 18-28 years
- Zone 2 26-35 years
- Municipal Boundaries
- County Boundaries



Area Code 315

Option 3 Rate Center Boundaries



LEGEND

- Zone 1 18-28 years
- Zone 2 26-35 years
- Rate Center Boundaries
- County Boundaries



**AREA CODE 315
OPTION NO. 3 - SPLIT BY COUNTY BOUNDARIES**

AFFECTED LOCAL CALLING FROM ONE SIDE TO THE OTHER (17 TOTAL)

*MANNSVILLE <> SANDY CREEK
OSCEOLA <> CAMDEN
CICERO <> BRIDGEPORT
CANASTOTA <> BRIDGEPORT
SYRACUSE <> MINOA
FAYETTEVILLE <> CHITTENANGO
MANLIUS <> CHITTENANGO
FABIUS <> NEW WOODSTOCK
LAFAYETTE <> NEW WOODSTOCK
CONSTANTIA <> CLEVELAND
SYRACUSE <> SYLVAN BEACH
SYRACUSE <> CANASTOTA
SYRACUSE <> CLEVELAND (IN PART)
SYRACUSE <> BRIDGEPORT (IN PART)
SYRACUSE <> CHITTENANGO (IN PART)
SYRACUSE <> CASENOVIA (IN PART)
SYRACUSE <> DERUYTER (IN PART)*

RATE CENTER BOUNDARIES SPLIT (9 TOTAL):

*BRIDGEPORT
CAZENOVIA
CHITTENANGO
CLEVELAND
DE RUYTER
MINOA
NEW WOODSTOCK
SANDY CREEK
WILLIAMSTOWN*