

**Level 3 Communications, LLC's¹ New York 631/934 Area Code Overlay
Consumer Outreach and Education Plan Proposal**

Introduction

On December 17, 2014, the New York State Public Service Commission (“Commission”) issued an Order Adopting an Overlay for Numbering Relief in the 631 Area Code in Case 14-C-0182. Under the Order, the new 934 numbering plan area (“NPA”) will serve the same geographic region currently served by the existing 631 NPA which covers all communities in Suffolk County, New York.

The Order further directs all carriers providing local exchange service in the 631 area code to file individual carrier plans for outreach and education programs to inform customers of the establishment of the new area code and its operation, and with the associated 10-digit dialing.

Assumptions

In addressing the implementation schedule, several considerations were made. Since this will be the first time an area code overlay is implemented in the 631 NPA, customers will need to make the local dialing change from 7 to 10 digits for all calls. As the Commission noted, the need to allow customers to become familiar with 10-digit dialing and to incorporate it in their normal and regular use of the telephone suggests that a longer period of permissive dialing should be used than was recommended by the industry. Therefore, the industry and Level 3 Communications, LLC (“Level 3”) agreed to implement the Commission’s recommended period of six months for network preparation, 11 months of permissive 7- or 10-digit dialing, and activation of new central office codes in the new NPA one month later.

Calendar of Events

The industry and Level 3 agree that a total of 18 months is needed to implement an effective customer education plan, prepare carriers’ networks and activate the new area code, as shown below:

Commission Order	December 17, 2014
Start of Network Preparation and Customer Education	January 17, 2015
Start of Permissive 10-Digit Dialing	July 18, 2015
End of Permissive Dialing and Start of Mandatory 10-Digit Dialing	June 18, 2016
Earliest New NPA Central Office Code Activation Date	July 16, 2016

¹ This filing is also submitted on behalf of the following entities: Broadwing Communications, LLC; Global Crossing Local Services, Inc.; TelCove Operations, LLC; and tw telecom of new york l.p.

Customer Education Scope

The industry and Level 3 agree that the following messages must be clearly communicated to business and residential customers in the 631 NPA as part of the customer education plan:

- The new 934 area code is needed to meet the demand for telephone numbers and will be “overlaid” or superimposed over the area now served by the 631 area code.
- Telephone numbers, including the current area code, will not change.
- Local calling areas will not change.
- The price of a call, coverage area, rates and services will not change due to the overlay.
- Starting July 18, 2015, customers should begin dialing the area code and telephone number whenever placing calls from the 631 area code. If they forget and dial just seven digits, their calls still will be completed.
- Starting June 18, 2016, customers placing calls from the 631 area code will be required to dial the area code and telephone number on all calls, including calls within the same area code. The same dialing procedure will apply to telephone numbers assigned from the new area code.
- Dialing 211, 311, 411, 511, 611, 711, 811, and 911 services offered in the 631 area code will not be affected by the overlay, and those calls will still be completed with just three digits.
- Customers should identify their telephone numbers as ten digits, and include the area code when giving the number to their friends, family, business associates and customers, etc.
- Customers should ensure that all services, automatic dialing equipment, or other types of equipment that are programmed with a 7-digit telephone number are reprogrammed to dial ten digits. Examples include life safety systems and medical monitoring devices, PBXs and fax machines, Internet dial-up numbers, alarm and security systems or gates, speed dialers, contact lists stored in telephones or mobile phones, call forwarding settings and voicemail services.
- Customers should check their personal or business checks, websites, contact information, stationery, advertising materials, ID tags and other important information containing their phone numbers to ensure their area code is included.
- Starting July 16, 2016, customers requesting new telephone lines or services in the Suffolk County area may be assigned telephone numbers with the new 934 area code.

Consumer Outreach and Education Plan

To raise customer awareness of the new 934 area code and the 10-digit dialing requirements as detailed above, Level 3 intends to send a notice (via bill insert) to affected customers approximately 30 days prior to the implementation of permissive dialing on July 18, 2015. A copy of the bill insert is attached hereto. In addition, a copy of the bill insert will also be posted on Level 3’s website at the same time the bill inserts are mailed to customers.

Given that for the 631 NPA Level 3 provides service to non-residential customers only, Level 3 believes that the proposed bill inserts alone will significantly reduce the instances in which its customers will activate the intercept message during the permissive dialing period. This is especially true given that many of Level 3’s customers are enterprise customers and the new 934

area code and 10-digit dialing requirements will require these customers to implement equipment changes to comply with the new requirements.

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