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August 31, 2015

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

Re: Case 07-C-1486 - Proceeding on Motion of the Commission, Pursuant to Section 97(2) of the PSL, to Institute a Proceeding to Investigate and Evaluate Options for Making Additional Central Office Codes Available in the 315 Area Code Region

Dear Secretary Burgess:

Please find attached, in Compliance with Ordering Paragraph 2 of the Commission's Order Directing Overlay of the 315 Area Code Region issued July 17, 2015 in the above-referenced proceeding a joint 315/680 Area Code Overlay Customer Outreach and Education Plan Proposal. Attachment A of the plan lists the companies participating in the joint plan.

If you have any questions, please call me at 443-2703.

Sincerely,

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Caroline Hill
Regulatory & Member Services Director

New York 315/680 Area Code Overlay
Customer Education Plan Proposal

Introduction

On July 17, 2015, the New York Public Service Commission ("Commission") issued an order approving an area code overlay relief plan for the 315 Numbering Plan Area ("NPA") region. The Commission noted that the overlay alternative is less costly, less disruptive, less likely to frustrate customers, and more likely to enhance the public interest than the other alternatives.

In the order, the Commission directed NANPA to issue a new area code and directed all carriers holding numbering resources in the 315 NPA to develop outreach and education plans to inform their customers of the overlay and the new NPA.

On August 5, 2015, NANPA convened an industry implementation call to discuss the implementation of the overlay, and the industry also discussed the development and execution of the consumer education plan.

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 315 NPA, customers will need to make the dialing change from 7- to 10-digits for all calls made within their 315/680 area code and 1+10-digits for all calls made to outside their 315/680 area code. The Commission reiterated its position from previous area code relief cases that the need for planning and preparation for the transition of customers from 7- to 10- digit dialing is of utmost importance.

The Commission stated that the network preparation for implementation of the overlay and the development of consumer outreach materials should be complete within nine months.

The industry agreed to implement the Commission's recommended period of nine months for network preparation, eleven months of permissive 7- or 10-digit dialing, followed by mandatory 10-digit dialing with a permanent intercept message, informing the caller to hang up and re-dial the call using 10-digits on a basis.

The new 680 NPA will be activated one month after the permissive dialing period ends.

Calendar of Events

Thus, the industry agrees that a total of twenty-one months is needed to implement an effective customer education plan, prepare carriers' networks and activate the new area code. During the August 5, 2015 call, the industry reached consensus on the timeline, as shown below:

Commission Order: July 17, 2015

Start of Network Preparation and Customer Education: August 12, 2015

Start of Permissive 10-Digit Dialing: March 12, 2016

End of Permissive Dialing/Start of Mandatory 10-Digit Dialing: February 11, 2017

Earliest New NPA Central Office Code Activation Date: March 11, 2017

Customer Education Scope and Methods

The industry agrees that the following messages must be clearly communicated to businesses and residential customers in the 315 NPA as part of the customer education plan:

1. The new 315 area code is needed to meet the demand for telephone numbers and will be “overlaid” or superimposed over the area now served by the 315 area code.

2. Telephone numbers, including the current area code, will not change.

3. Local calling areas will not change.

4. The price of a call, coverage area, rates and services will not change due to the overlay.

5. Starting March 12, 2016, customers should begin dialing the area code and telephone number whenever placing calls within the 315 area code. If they forget and dial just seven digits, their calls still will be completed.

6. Starting February 11, 2017, customers placing calls from within the 315 and the new 680 area code will be required to dial the area code and telephone number on all calls within the NPA, including calls within the same area code.

7. Dialing 211, 311, 411, 511, 611,711, 811, 911 services offered in the 315 area code will not be affected by the overlay, and those calls will still complete with just three digits.

8. 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.

9. 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.

10. Customers should check their personal or business checks, websites, contact information, stationary, advertising materials, ID tags and other important information containing their phone numbers to ensure their area code is included.

11. Starting March 11, 2017, customers requesting new telephone lines or services in the 315 NPA may be assigned telephone numbers with the new 680 area code.

As the Company begins preparing its network, we will also begin preparing customer education materials and begin educating their customer-facing employees and their affected customers of the upcoming overlay.

The Company will use a variety of communication methods to inform its customers of the implementation of the new 860 area code, including:

1. bill messages
2. bill inserts
3. postcards or other direct mail notices
4. Text and/or email notices.
5. Posting of Overlay information on the Company Website and/or Social Media sites
6. Prepare targeted communication notices for business customers or other customers with special needs, as deemed appropriate.

The industry suggests that the Commission continue to utilize its own website to further educate consumers of the new area code.

In addition, press/news releases will be issued by the Company just prior to the permissive dialing and mandatory dialing start dates to remind customers in the impacted area.

The industry has formed a joint industry committee to assist service providers in developing consistent and unified customer education information to customers in the impacted area, and to provide technical guidance to minimize possible disruption.

Directories

The Company will ensure that its directory publisher and Directory Assistance Provider is aware of the new 860 area code, and that it will also serve the same geographic region as the existing 315 area code.

The Company will inform and encourage directory publishers to revise their customer guide pages to indicate the new area code for consumers, as new directories are published.

Yellow page listings will evolve over time to incorporate the new area code. Customers will be encouraged by their account representatives to publish their area code and telephone number in their advertising.

Attachment A

New York 315/680 Area Code Overlay
Customer Education Plan Proposal
Companies Included in this Filing

Citizens Telephone of Hammond

Edwards Telephone Company

Finger Lakes Technologies Group

Newport Telephone Company

Nicholville Telephone Company, Inc.

Northland Networks, d/b/a Northland Communications

NTCNet

Oneida County Rural Telephone Company

Ontario Telephone Company

Oriskany Falls Telephone Company

Port Byron Telephone Compnay

Slic Network Solutions, Inc.

TDS Metrocom

Township Telephone Company

Trumansburg Telephone Company

Vernon Telephone Company

Westelcom