Level 3 COMMUNICATIONS
Connecting and Protecting the Networked World℠

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VIA ELECTRONIC FILING

Honorable Kathleen Burgess, Secretary
New York State Public Service commission
3 Empire State Plaza, 19th Floor
Albany, New York 12223

Re: Case 07-C-1486 - Proceeding of Motion of the Commission, Pursuant to Section 97(2) of the Public Service Law, 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:

Level 3 Communications, LLC and its affiliates (Broadwing Communications, LLC; Global Crossing Local Services, Inc.; TelCove Operations, LLC; and tw telecom of new york l.p.) respectfully submit the attached 315/680 Area Code Overlay Customer Outreach and Education Plan Proposal in response to the Commission's Order Directing Overlay of the 315 Area Code Region issued July 17, 2015 in the above-referenced proceeding.

Any questions about this filing may be directed to me at (585) 255-1425 or diane.peters@level3.com.

Sincerely,

Diane L. Peters

Diane L. Peters

Enclosure

cc: DMM Party List (via email)
Carolyn Ridley, Senior Director of State Public Policy (via email)

Level 3 Communications, LLC's[1] New York 315/680 Area Code Overlay
Customer Outreach and Education Plan Proposal

Introduction

On July 17, 2015, the New York Public Service Commission ("Commission") issued an Order Directing Overlay of the 315 Area Code Region in Case 07-C-1486. Under the Order, the new 680 numbering plan area ("NPA") will service the same geographic region currently served by the existing 315 NPA which covers all or part of 18 counties in north central New York, including Cayuga, Chenango, Cortland, Fulton, Hamilton, Herkimer, Jefferson, Lewis, Madison, Oneida, Onondaga, Ontario, Oswego, Otsego, Saint Lawrence, Seneca, Wayne and Yates counties.

The Order further directs all carriers holding numbering resources in the 315 area code to file individual plans for outreach and education programs to acquaint customers with 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 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 industry and Level 3 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-digit dialing.

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

Calendar of Events

The industry and Level 3 agree 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, 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

[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.

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

Customer Education Scope

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, stationery, 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.

Customer Outreach and Education Plan

To raise customer awareness of the new 680 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 March 12, 2016. 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 680 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 680 area code and 10-digit dialing requirements will require these customers to implement equipment changes to comply with the new requirements.

Area Code Overlay Approved for the New York 315 Area Code

To ensure a continuing supply of telephone numbers, the new 680 area code will be added to the area served by 315. This is known as an area code overlay. **Get ready to change the way you dial your local calls!**

What is an area code overlay?

An overlay is the addition of another area code (680) to the same geographic region as an existing area code (315). **An overlay does not require customers to change their existing area code.**

Who will be affected?

The 315 area code serves communities in north central New York, including all or parts of Cayuga, Chenango, Cortland, Fulton, Hamilton, Herkimer, Jefferson, Lewis, Madison, Oneida, Onondaga, Ontario, Oswego, Otsego, Saint Lawrence, Seneca, Wayne and Yates counties. The new **680 area code** will serve the same geographic area currently served by the existing 315 area code.

What will be the new dialing procedure?

To complete local calls, the new dialing procedure requires callers to dial **area code + telephone number.** This means that all calls in the 315 area code that are currently dialed with seven digits will need to be dialed using ten digits, that is, the **area code + telephone number.** The same dialing procedure will apply to telephone numbers assigned to the new 680 area code.

When will the change begin?

Effective **March 12, 2016** you should begin using the new dialing procedures whenever you place a call from the 315 area code. If you forget and dial just seven digits, your call will still be completed.

Beginning **February 11, 2017**, you must use the new dialing procedures, as described above for all calls. After this date, if you do not use the new dialing procedures, your calls will not be completed and a recording will instruct you to hang up and dial again.

Beginning **March 11, 2017**, new telephone lines or services may be assigned numbers using the new 680 area code.

What will you need to do?

In addition to changing your dialing procedures, all services, automatic dialing equipment, or other types of equipment that are programmed to dial a 7-digit number will need to be reprogrammed to use the new dialing procedure. Some examples are life safety systems or medical devices, PBXs, fax machines, Internet dial-up numbers, alarm and security systems or gates, speed dialers, mobile phone contact lists, call forwarding settings, voicemail services, and similar functions, etc. Be sure to check your website, business stationery, advertising materials, personal and business checks, contact information, and your personal or pet ID tags to ensure the area code is included.

What will remain the same?

- Your telephone number, including current area code, will not change.
- The price of a call, coverage area, or other rates and services will not change due to the overlay.
- What is a local call now will remain a local call regardless of the number of digits dialed.
- You will continue to dial 1+ area code + telephone number for all long distance calls.
- You can still dial just three digits to reach 911.
- If 211, 311, 411, 511, 611, 711 or 811 are currently available in your community you will still dial these codes with just three digits.

Who may you contact with questions?

If you have any questions regarding information provided in this notice, please call (Service Provider's name) at (Service Provider's Contact number) or access (Service Provider's website) for more information. You can also visit the Department of Public Service Commission of New York's website at http://www.dps.ny.gov/ for further information.