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Richard C. Fipphen
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February 12, 2010

Honorable Jaclyn A. Brilling
Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 09-C-0058 – Proceeding to Investigate and Evaluate Options for Making Additional Central Office Codes Available in the 718/347 Area Code Region

Dear Secretary Brilling:

Pursuant to ordering paragraph 3 of the Order Approving Area Code Relief Plan (issued and effective January 7, 2010), I am filing the enclosed "New York 718/347/929 Area Code Overlay Customer Education Plan Proposal," on behalf of AT&T Communications of New York, Inc., Sprint Nextel, T-Mobile, Verizon New York Inc., and Cellco Partnership, d/b/a Verizon Wireless.

Respectfully submitted,

Richard C. Fipphen

cc: Active Party List (By E-Mail)

Introduction

On January 7, 2010, the State of New York Public Service Commission ("Commission") issued an order approving an all-services area code overlay relief plan for the 718/347 Numbering Plan Area ("NPA") region. The Commission noted that overlaying another area code would be a better option for an area where an all-services overlay has already been implemented and mandatory 10–digit dialing is in place. Overlaying another area code for the 718/347 NPA region would minimize possible disruption to consumers and businesses while providing additional telephone numbering resources for the region. In the order, the Commission directed the North American Numbering Plan Administrator ("NANPA") to issue a new area code and directed all carriers providing services in the 718/347 NPA region to develop outreach and education plans to inform their customers.

On January 21, 2010, NANPA convened an industry call to discuss the implementation of the new 929 NPA, and the development and execution of the consumer education plan. Since NANPA filed the 718/347 NPA Relief Petition in January 2009, the exhaust forecast has been moved out to 2Q 2012 from 4Q 2011. In light of the exhaust forecast change, the industry realizes implementation does not need to proceed immediately and recommends a delay in the start of implementation of the new area code until July 2010, so that the implementation can be completed by April 2011. This schedule will ensure that there is adequate time to implement an effective customer education plan, and provide area code relief prior to exhaust. The industry is sensitive to balancing the need to implement area code relief in a timely manner and to providing the most effective consumer education to inform all end users of the new NPA.

Assumptions

Since the 718/347 region already has 1+10 digit dialing in place for all calls, no changes will be made to the dialing patterns for consumers and businesses in the impacted area with the implementation of the new 929 NPA. The main objective of the customer education plan is to educate 718/347 residential and business consumers that the new 929 area code will serve the same geographic region (boroughs of Bronx, Brooklyn, Queens and Staten Island) as the existing 718 and 347 area codes.

Calendar of Events

The industry agrees that a total of nine months is needed to implement an effective customer education plan, prepare carriers' networks and activate the new area code. During the January 21st call, the industry reached consensus on the timeline, as shown below:

New York State Commission Order	January 7, 2010
Start of Network Preparation and Customer Education	July 16, 2010
Completion of Network Preparation	March 19, 2011
Earliest New NPA Central Office Code Activation Date	April 16, 2011

Customer Education Scope and Methods

The industry agrees that the following messages, through a variety of communication methods, must be clearly communicated to businesses and residential customers as part of the customer education plan:

- The new 929 area code is needed to meet the demand for telephone numbers and will be "overlaid" or superimposed over the area now served by the 718 and 347 area codes.
- Telephone numbers in New York City, including the current area codes, 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.
- There will be no changes made to the current dialing plan. All calls will be continued to be dialed using 1+10 digits (1+ area code + seven-digit telephone number).
- Dialing 211, 411, 711, 811, 911 or other three-digit services offered in the 718 and 347 area codes will not be affected by the new 929 NPA, and those calls will still complete with just three digits.
- Customers should continue to 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 1+10 digit telephone numbers recognize the new 929 area code as a valid area code.
- Beginning April 16, 2011, customers requesting new telephone lines or services in the Bronx, Brooklyn, Queens, and Staten Island areas may be assigned telephone numbers with the new 929 area code.

As service providers begin preparing their networks, they will begin preparing their customer education communication materials and begin educating their customer-facing employees of the upcoming overlay. Service providers will complete distribution of all customer education materials no later than April 16, 2011.

Service providers will use a variety of communication methods to inform 718/347 region customers of the implementation of the new 929 area code. Service providers may choose to use any of the following communication methods: bill messages, bill inserts, postcards, other direct mail notices, or text messaging. Service providers may also post information about the overlay on their websites to further educate their customers. Service providers may also develop and distribute more targeted communication notices for their 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 718/347 consumers of the new area code. In addition, press/news releases may be issued by service providers and the Commission just prior to April 16, 2011 to remind customers in the impacted area.

The industry will also form a joint industry committee to assist service providers in developing similar customer education information for distribution to customers in the impacted area and to provide technical guidance to minimize possible disruption.

Directories

Service providers partnering with directory publishers will ensure that directory publishers are aware that the new 929 area code will also serve the same geographic region as the existing 718 and 347 area codes. Service providers will 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 continue to be encouraged by their account representatives to publish their area code and telephone number in their advertising.