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February 16, 2017

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

Re: Case 16-C-0297 – Petition of Neustar, Inc. for Approval of NPA Relief Plan for the 518 Area Code Region

Dear Secretary Burgess:

In accordance with the Order issued by the Commission September 15, 2016 in Case No.16-C-0297, Charter Fiberlink NY-CCO, LLC ("Charter") submits this revised plan for customer outreach and education. The attached Charter plan will be used to inform its customers in area code 518 about the overlay of new area code 838, and the associated 10-digit dialing pattern change.

Please contact me at the above number you have any questions.

Respectfully submitted,



Allyson I. Blevins

Charter Fiberlink NY-CCO, LLC

New York 518/838 NPA Overlay, Customer Education Plan

Introduction

On September 15, 2016, the State of New York Public Service Commission in its order of Case Number: 16-C-0297 approved an all services overlay as the relief method for the 518 NPA. The 518 NPA covers the north-east portion of New York serving communities such as Plattsburgh, Saranac and Albany. The new **838 NPA** will serve the same geographic area currently served by the existing 518 NPA.

In the order, the Commission directed all carriers holding numbering resources in the 518 Numbering Plan Area to file a plan for customer outreach and education to prepare customers for the new area code and the associated changes with 10-digit dialing.

Since the 518 NPA was declared to be in jeopardy status on August 30, 2016, the implementation of the 838 NPA will be accelerated. The Commission has directed that network preparations for implementation of the overlay and the development of the consumer outreach materials be complete within nine months. This is also the first time that an area code overlay has been implemented in the 518 NPA. Customers will need to adjust their dialing from 7 to 10-digit for all calls within the 518/838 area code and 1 + 10 digits for all calls made to numbers outside the 518/838 area code.

The industry will be implementing the Commission's recommended timeline of nine months for network preparation, eleven months of 7 or 10-digit dialing, followed by mandatory 10-digit dialing.

Implementation Schedule

Activity	Key Dates
Start of Network Preparation and Customer Education	October 15, 2016
Permissive (local 7-Digit & 10-Digit) Dialing begins	March 18, 2017
Earliest Date Codes from the new 838 NPA can be ordered through NANPA	July 15, 2017
Mandatory local 10-Digit Dialing begins	August 19, 2017
Earliest New 838 NPA NXX Code Activation/In-Service Date	September 19, 2017

Key Messages

The industry recognizes that as part of the customer education plan there are several key messages that must be clearly communicated to business and residential customers in the 518 NPA:

- The new 838 area code is needed to meet the demand for telephone numbers and will be “overlaid” or superimposed over the area now served by the 518 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 March 18, 2017, customers should begin dialing the area code and telephone number whenever placing calls within the 518 area code. If they forget and dial just seven digits, their calls still will be completed.
- Starting August 19, 2017, customers placing calls from within the 518 will be required to dial the area code and telephone number on all calls within the NPA.
- Dialing 211, 311, 411, 511, 611, 711, 811, 911 services offered in the 518 area code (or new 838 area code) will not be affected by the overlay, and those calls will still complete 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, stationary, advertising materials, ID tags and other important information containing their phone numbers to ensure their area code is included.
- Starting September 19, 2017, customers requesting new telephone lines or services in the 518 NPA may be assigned telephone numbers with the new 838 area code.

Customer Outreach Methods/Delivery Methods and Dates

- Beginning in January 2017, Charter Fiberlink NY-CCO, LLC (“Charter”) will train customer-facing staff regarding the changes for the new overlay area code. The training documentation will include the relevant implementation dates associated with the transition to mandatory 10-digit dialing.
- In January 2017, Charter will update its website to provide specific information about the new 838 overlay code, including the dates for permissive dialing and the start date

of the implementation of mandatory 10-digit dialing. The website will also include a link to the customer letter that Charter is sending to all of their residential and business customers in the 518 NPA. English and Spanish language versions of the letter are available.

- <http://www.charter.net/support/voice/new-york-518-area-code-overlay/>
- In February 2017, Charter will include an additional bill insert or bill message in all mailed and electronic invoices explaining of the new overlay area and the new 10-digit dialing pattern. This will include verbiage created by the Industry Committee for customer education.
- Beginning in July 2017, Charter will republish the training documents for customer-facing departments about the new overlay and the implementation of mandatory 10-digit dialing.
- During the July 2017 bill cycle, Charter will remind customers with an additional bill insert or bill message in all mailed and electronic invoices. This will include verbiage created by the Industry Committee for customer education.

Industry Implementation Committee (IIC)

Charter has and will continue to participate in the Industry Implementation Committee (“IIC”) for the 518/838 overlay. It will rely on the IIC recommendations to guide its consumer notice and education efforts aimed at establishing awareness of the dialing pattern change that will accompany the beginning of the permissive and mandatory dialing dates brought about by the overlay of NPA 518 with 838.

Charter will also ensure that its network meets all agreed upon IIC dates in regards to the conversion of 10-digit signaling and any announcements at the start of the mandatory 10-digit dialing period.