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August 28, 2024

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case 24-C-0314 – Petition of the North American Numbering Plan Administrator on Behalf of the New York Telecommunications Industry for Relief of the 347/718/917/929 Numbering Plan Area

Dear Secretary Phillips:

In accordance with the Notice Soliciting Comments (issued July 3, 2024) in the above-referenced proceeding, enclosed please find the Joint Comments of AT&T, T-Mobile, and Verizon.

Respectfully submitted,

Joseph A. Post

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cc: Florence Weber, NANPA
Linda Hymans, NANPA
Carla Mascaro, AT&T
Michelle Painter Lama, T-Mobile

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of the North American Numbering Plan Administrator on Behalf of the New York Telecommunications Industry for Relief of the 347/718/917/929 Numbering Plan Area	**Case 24-C-0314**

JOINT COMMENTS OF AT&T, T-MOBILE, AND VERIZON

AT&T, T-Mobile, and Verizon (the "Carriers") submit the following comments in response to the Notice Soliciting Comments dated July 3, 2024 ("Notice"). In the Notice, the Commission requests comments on the petition filed by the North American Numbering Plan Administrator ("NANPA") on May 22, 2024, requesting approval to implement an "all-services distributed overlay" to provide necessary area code relief for the 347/718/917/929 Numbering Plan Area ("NPA"). For the reasons set forth below, the Carriers respectfully submit that the Commission should approve the all-services distributed overlay option to provide long-term numbering relief for the 347/718/917/929 NPA.

Background

The Commission instituted this proceeding in response to a May 22, 2024 petition from NANPA for approval to implement an "all-services distributed overlay" to provide area code relief for the 347/718/917/929 NPA, which has a projected exhaust date of fourth quarter 2026. Under the proposed all-services distributed overlay, new wireline, VoIP, and wireless phone numbers would be assigned to a new area code that serves the same geographic area as the 347/718/917/929 NPA. On July 3, 2024, the Commission requested comment on NANPA's suggested implementation of the new area code. The Carriers urge the Commission to adopt NANPA's recommendation.

Discussion

I. The All-Services Distributed Overlay Plan Is the Most Effective and Practical Approach to Area Code Relief for the 347/718/917/929 NPA.

The Carriers strongly support NANPA's all-services distributed overlay recommendation. The implementation of the all-services distributed overlay will minimize inconvenience to consumers, provide relief in the most timely manner, and support the continuing trend throughout the United States to use the overlay method as the preferred form of area code relief.

An all-services distributed overlay has serious practical advantages over the "boundary elimination overlay" relief measure that was also considered. The all-services distributed overlay is projected to provide relief for 11 years and will affect only those customers in the current 347/718/917/929 NPA. In contrast, the boundary elimination method is projected to provide relief for 14 years but would affect customers in both the 347/718/917/929 NPA and the 212/332/646/917 NPA as well – in other words, all of New York City. The boundary elimination method is also more difficult for service providers to implement from a translations, billing, and operational support system perspective. We agree with NANPA that the customer confusion and additional industry work required for the boundary elimination overlay alternative outweighs the benefit of the additional three years of life that this alternative would provide.

Overlays are the least disruptive form of area code relief for consumers and can be effectively and efficiently implemented with minimal technical issues. Overlays are overwhelmingly common across North America, and have become the only form of area code relief implemented in 16 years.[1] Past concerns that an overlay and ten-digit dialing would

[1] The last area code split was implemented in New Mexico in 2008. *See* NANPA Planning Letter 358 available at https://www.nationalnanpa.com/pdf/PL_358.pdf.

confuse customers is no longer a consideration since customers have already transitioned to mandatory ten-digit dialing due to implementation of the 988 abbreviated dialing code to reach the 988 Suicide and Crisis Lifeline. And it is a non-issue in this case because ten-digit dialing has long been in place for customers served by the 347/718/917/929 NPA. In fact, the 585 NPA is the only NPA left in the state of New York that still has seven-digit local dialing, and only 59 of the 366 NPAs in service across the United States and its territories still have seven-digit local dialing.[2]

Indeed, this Commission has previously recognized the superiority of the overlay option: "After review of the alternative forms of relief that could be used…, we conclude that the overlay alternative is less costly, less disruptive, less likely to frustrate customer acceptance, and more likely to enhance the public interest than the other identified alternatives."[3] The Carriers urge the Commission to approve NANPA's recommendation.

II. An Overlay Will Be Easily Implemented and Adapted to by Consumers.

Overlays have become the most prevalent method of area code relief across the country because they are the most effective and efficient solution. In the past, some state commissions had expressed concern for the burden and inconvenience to consumers of the transition to ten-digit dialing on calls within the same area code. But, as noted above, these concerns are long outdated and do not apply here in any event.

Conclusion

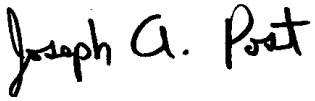
An all-services distributed overlay for the 347/718/917/929 NPA is the most practical and effective form of area code relief available. It is the most convenient for customers and the most

[2] *See* NANPA's NPA Dialing Plans available at https://www.nationalnanpa.com/reports/reports_npa.html.

[3] Case 14-C-0182, Order Adopting an Overlay for Numbering Relief in the 631 Area Code (issued and effective December 17, 2014), at 28.

efficient solution for telecommunications providers to implement in the short timeframe left before the 347/718/917/929 NPA exhausts. For the reasons set forth above, the Carriers urge the Commission to approve NANPA's proposed all-services distributed overlay and implementation schedule.

Respectfully submitted,



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