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Richard C. Fipphen Assistant General Counsel



January 23, 2015

Mr. Douglas Elfner Director, Consumer Policy New York State Department of Public Service Three Empire State Plaza Albany, New York 12223

Re: Case 14-C-0182 – Petition of Neustar, Inc. for Approval of NPA Relief Plan for the 631 Area Code

Dear Mr. Elfner:

In compliance with Ordering Paragraph No. 2 of the Commission's December 17, 2014 Order in this proceeding, I am transmitting the attached New York 631/934 Area Code Overlay Customer Education Plan Proposal. The following carriers have agreed to implement this customer education proposal, following approval by the Office of Consumer Services: AT&T, CenturyLink, Sprint, T-Mobile, Verizon, and Windstream.

Please contact me at the above number if you have any questions concerning this filing.

Respectfully submitted,

Pulsa C. Toplan

Richard C. Fipphen

cc: Mary E. Burgess, Esq. (AT&T)
Adam Sherr, Esq. (CenturyLink)
Diane C. Browning, Esq. (Sprint)
Michele Thomas, Esq. (T-Mobile)
Edward Krachmer, Esq. (Windstream)

New York 631/934 Area Code Overlay Customer Education Plan Proposal

Introduction

On December 17, 2014, New York Public Service Commission ("Commission") issued an order approving an area code overlay relief plan for the 631 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 providing services in the 631 NPA to develop outreach and education plans to inform their customers of the overlay and the new NPA.

On January 8, 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 631 NPA, customers will need to make the local dialing change from 7 to 10 digits for all calls. As the Commission noted, the need to allow customers to become familiar with 10-digit dialing and to incorporate it in their normal and regular use of the telephone suggests that a longer period of permissive dialing should be used than was recommended by the industry. Therefore, the industry agreed to implement the Commission's recommended period of six months for network preparation, eleven months of permissive 7- or 10-digit dialing, and activation of new central office codes in the new NPA one month later.

Calendar of Events

The industry agrees that a total of eighteen months is needed to implement an effective customer education plan, prepare carriers' networks and activate the new area code. During the January 8, 2015 call, the industry reached consensus on the timeline, as shown below:

Commission Order
Start of Network Preparation and Customer Education
Start of Permissive 10-Digit Dialing
End of Permissive Dialing and Start of Mandatory 10-Digit Dialing
Earliest New NPA Central Office Code Activation Date

December 17, 2014 January 17, 2015 July 18, 2015 June 18, 2016 July 16, 2016

Customer Education Scope and Methods

The industry agrees that the following messages must be clearly communicated to businesses and residential customers in the 631 NPA as part of the customer education plan:

- The new 934 area code is needed to meet the demand for telephone numbers and will be "overlaid" or superimposed over the area now served by the 631 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 July 18, 2015, customers should begin dialing the area code and telephone number whenever placing calls from the 631 area code. If they forget and dial just seven digits, their calls still will be completed.

New York 631/934 Area Code Overlay Customer Education Plan Proposal

- Starting June 18, 2016, customers placing calls from the 631 area code will be required to dial the area code and telephone number on all calls, including calls within the same area code. The same dialing procedure will apply to telephone numbers assigned from the new area code.
- Dialing 211, 311, 411, 511, 611,711, 811, 911 services offered in the 631 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, stationery, advertising materials, ID tags and other important information containing their phone numbers to ensure their area code is included.
- Starting July 16, 2016, customers requesting new telephone lines or services in the Suffolk County area may be assigned telephone numbers with the new 934 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 and their affected customers of the upcoming overlay.

Service providers will use a variety of communication methods to inform 631 customers of the implementation of the new 934 area code. Service providers may choose to use any of the following communication methods: bill messages, bill inserts, postcards or other direct mail notices, text messages, and email notices. Service providers will 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 Suffolk County consumers of the new area code. In addition, press/news releases will be issued by service providers and the Commission (if possible) 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

Service providers will ensure that directory publishers are aware that the new 934 area code will also serve the same geographic region as the existing 631 area code. 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 be encouraged by their account representatives to publish their area code and telephone number in their advertising.