

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of the North American Numbering Plan
Administrator, on behalf of the California
Telecommunications Industry, for Relief of the 805
Numbering Plan Area.

Application 16-11-008
(Filed November 17, 2016)

**COMMENTS OF CTIA ON PROPOSED DECISION
GRANTING REQUEST FOR AN ALL-SERVICE
AREA CODE OVERLAY IN THE 805 NUMBERING PLAN AREA**

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Attorneys for CTIA

Dated: May 4, 2017

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of the North American Numbering Plan
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Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), CTIA¹ comments on the Proposed Decision Granting Request for an All-Service Area Code Overlay in the 805 Numbering Plan Area issued in the above-captioned proceeding on April 14, 2017 (“Proposed Decision”).

I. INTRODUCTION

The Proposed Decision erred in failing to completely and accurately consider either CTIA’s comments or the supplementary information CTIA provided on the record² in determining that a funded public education program (“PEP”) is a necessary part of the relief plan for the 805 Numbering Plan Area (“NPA”). A thorough review of the record of this proceeding illustrates that there are sufficient grounds for the Commission to determine that a funded PEP is unnecessary and to grant the relief sought in the North American Number Plan Administrator’s (“NANPA’s”) November 16, 2016 application for an area code overlay implemented through an unfunded joint consumer education plan (“Application”).

¹ CTIA – The Wireless Association® (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² See CTIA Comments in Response to February 23, 2107 Assigned Administrative Law Judge’s Ruling, A. 16-11-008 (March 10, 2017) (“CTIA Comments”).

II. THE PROPOSED DECISION ERRS IN ITS DETERMINATION TO ORDER A FUNDED PEP

NANPA's Application seeking Commission approval of an area code overlay for the 805 NPA demonstrated that a funded PEP, as has been previously ordered by the Commission in connection with the creation of new area codes, is unnecessary for successful implementation of an all-service overlay in the 805 NPA. The Application illustrated how the industry, voluntarily working together to develop joint consumer education materials and methods, would be less bureaucratic, more efficient, and more cost-effective than a funded PEP in achieving consumer awareness of the new area code. Through a February 23, 2017 Ruling, the assigned Administrative Law Judge sought additional information regarding the statements set forth in the Application about the lack of need for a funded PEP. CTIA responded to that ruling by providing additional information and arguments that fully supported and augmented the showing made in the Application that a funded PEP is not necessary for successful implementation of an all-service overlay in the 805 NPA.

The Proposed Decision states that "we have reviewed the comments submitted by CTIA and are not persuaded by its 'supplementary information' or arguments."³ In support of this statement, the Proposed Decision highlights three alleged deficiencies in CTIA's showing. First, the Proposed Decision inaccurately states that CTIA advanced a "complaint based standard for public education," and then rejects such approach.⁴ Second, the Proposed Decision asserts that CTIA failed to provide sufficient information regarding customer education plans without a funded PEP that have been implemented by the industry in other states. Finally, the Proposed Decision rejects CTIA's allegation that a funded PEP creates an unnecessarily complicated bureaucracy that offers no attendant benefits to consumers. As illustrated below, these assertions reflect a mischaracterization of CTIA's arguments, a misinterpretation of the information provided by CTIA, and an incomplete review of that information.

A. The Proposed Decision Fails to Consider the Record Evidence in its Entirety

The Proposed Decision fails to explain how, in light of the entirety of the evidence set forth in the Application and supplemented in CTIA's Comments, a funded PEP is a necessary part of the relief plan for the 805 area code. Rather, the Proposed Decision focuses on one

³ Proposed Decision, p. 26.

⁴ *Id.*

element of that evidence and asserts that it provides insufficient justification for the Commission to allow the implementation of the 805 overlay to move forward absent a funded PEP. The Proposed Decision errs in failing to make a reasoned determination in light of the whole record.

In its comments, CTIA highlighted verified statements contained in the Application that establish that there is no need for a funded PEP. Primary among those statements is that 30 area code overlays have been implemented successfully in 21 states other than California in the past ten years *without* the use of a funded PEP. As emphasized in the Application and reiterated by CTIA, in the implementations of those 30 area code overlays, the industry’s joint customer education efforts effectively and efficiently educated customers about dialing changes and new area code overlays. In its comments, CTIA also illustrated that the industry’s proposed customer education plan “mirror[s] to a large extent the funded PEPs previously approved by the Commission.”⁵ The Proposed Decision ignores these facts and focuses solely on CTIA’s statement that there were no significant complaints from customers when the industry used a voluntary and collaborative, but “unfunded,” model for customer education⁶ – the same model proposed in the Application. In doing so, the Proposed Decision misinterprets the intent of the statement and uses it as the basis for overlooking the entirety of the evidence presented.

Specifically, the Proposed Decision states that CTIA “claims the education plans implemented in over 30 area code overlays outside of California were successful because no customers complained.”⁷ The Proposed Decision then concludes that such “is not the benchmark adopted by this Commission and we refuse here to adopt a complaint-based standard for a public education function.”⁸ However, CTIA never advocated for such a benchmark. CTIA recognizes that any PEP must comport with the programmatic goals set forth by the Commission:

- Public awareness of the change in dialing patterns and area code identification resulting from implementation of the overlay;
- Public understanding of how they will be affected by the change and the rationale behind the change;
- Public assurance that the cost and quality of service will not be adversely affected; and

⁵ CTIA Comments at 4.

⁶ Proposed Decision, p. 26; CTIA Comments, p. 3.

⁷ Proposed Decision, p. 26.

⁸ *Id.*

- Promotion of positive acceptance by customers of the change;⁹

Satisfaction of these goals is the benchmark. CTIA asks that the Commission consider that there are methods of satisfying the benchmark that do not involve a funded PEP.

CTIA pointed to the absence of consumer complaints in other jurisdictions as indicia that the non-funded PEPs used in the 30 area code overlays cited by CTIA were effective in satisfying the Commission's stated programmatic goals, or "benchmark." The absence of complaints tends to indicate that the public was aware of the change in dialing patterns, that the public understood how they would be affected and the rationale behind the change, that cost and quality of service was not adversely affected, and that customers' acceptance of the change was positive. It is because there is a positive, logical correlation between the absence of consumer complaints and the achievement of programmatic goals that CTIA suggests the Commission consider the type of PEP used in the cited overlays. Furthermore, CTIA below provides specific detail illustrating that the industry's proposed customer education plan is substantially similar to that the Proposed Decision would adopt.

The totality of the record establishes that the industry's proposed, comprehensive consumer education program without a funded PEP is substantially similar to those used in area code overlays in other jurisdictions;¹⁰ and that the Commission can reasonably conclude that the industry's suggested consumer education program will satisfy programmatic goals. Thus, the record lends credence to the conclusion that a funded PEP is not a necessary part of the relief plan for the 805 NPA.

B. The Proposed Decision Incorrectly Asserts that the Record Contains Inadequate Information Regarding Educational Activities That Would be Performed in the Absence of a Funded PEP

The Proposed Decision is incorrect that the record provides inadequate information regarding the educational activities that would be performed in the absence of a funded PEP. The Application, coupled with the information provided in CTIA's comments, provides ample information to make such a comparison.

The Application provides that:

Instead [of a funded PEP], the CPUC should allow the industry to voluntarily work together as a committee to develop joint customer education materials and

⁹ *Id.*, p. 22 (citing to D.98-12-081).

¹⁰ *See* Section II.B. *infra*.

methods. Individual carriers remain ultimately responsible for educating their own customers, *but the industry agrees to utilize the following joint customer education plan, which is consistent with what has been utilized in 30 overlay implementations in 21 other states, and conforms to the requirements in the California PU Code 7931.*¹¹

In its comments, CTIA noted that comparing the consumer education activities that the industry has agreed to perform in the absence of a funded PEP with the list of activities most recently approved by the Commission as part of a funded PEP shows that they are substantially similar.¹² In response to this information, the Proposed Decision states that, “while the [educational] activities CTIA claims are similar to those ordered in a PEP, CTIA provides no record of those activities to allow for any sort of measurable comparison for any of the activities.”¹³ As described below, this statement is demonstrably inaccurate.

The information supporting CTIA’s statement is found in the Application and in prior Commission decisions approving area code overlays. Specifically, comparing the industry’s proposed customer education program to the PEP recently approved by the Commission in Decision 16-07-014 for the 213/323 area code overlay¹⁴ shows that, with the exception of dissemination of the relevant information through paid advertising (e.g., newspaper, radio, and television), industry appearances on local radio or TV talk shows (not required in recent overlays¹⁵), and correcting payphone signage to include updated dialing instructions (omitted inadvertently¹⁶), the industry has *committed* to perform *all* other activities. In the customer education plan set forth in the Application, the industry has agreed to:

- Distribute overlay information internally as a job aid for customer service representatives to answer customer questions (90 days prior to permissive dialing). *Compare* Activity No. 4 in Commission-approved funded PEP for 213/323 overlay.

¹¹ Application, p. 7 (emphasis added).

¹² CTIA Comments, p. 3, citing to the funded PEP approved by the Commission in D. 16-07-014.

¹³ Proposed Decision, p. 26.

¹⁴ D. 16-07-014, Attachment A.

¹⁵ The industry has not offered to make appearances on local radio or TV talk shows (Activities Nos. 12 and 16 in Commission-approved funded PEP for 213/323 overlay) because no such appearances have been requested in the last several overlays implemented in California, so it is reasonable to expect that no such appearances would be requested for the 805 overlay.

¹⁶ Correcting payphone signage to include updated dialing instructions (Activity No. 13 in Commission-approved funded PEP for 213/323 overlay) was inadvertently omitted in the proposed customer education program. The industry will commit to completing this activity at least 60 days in advance of the mandatory dialing date.

- Provide two customer notifications announcing the new area code plan that include information about 1 + 10-digit dialing, the affected area, the remaining key implementation dates, and how customers should prepare for the overlay (30 days prior to the beginning of permissive dialing and 30 days prior the beginning of mandatory dialing). *Compare* Activity Nos. 8 and 17 in Commission-approved funded PEP for 213/323 overlay.
- Provide two targeted letters with comparable information to that contained in the customer notifications as reminders to alarm and safety associations, PSAPs, coin-operated pay telephone providers, telephone directory publishers, and California Relay Services (60 days prior to the beginning of permissive dialing and 60 days prior the beginning of mandatory dialing). *Compare* Activity Nos. 7 and 18 in Commission-approved funded PEP for 213/323 overlay.
- Issue press release(s) describing the overlay and its geography boundaries, the key implementation dates, the dialing change, and how customers should prepare for the overlay (one week prior to permissive dialing and one week prior to mandatory dialing). *Compare* Activity Nos. 6 and 14 in Commission-approved funded PEP for 213/323 overlay.
- Update industry websites and/or social media sites with overlay information (90 days prior to permissive dialing). *Compare* Activity No. 5 in Commission-approved funded PEP for 213/323 overlay.
- Update directories by adding new NPA overlay information to alert customers in 805 area code (ongoing as directories are published). *Compare* Activity No. 11 in Commission-approved funded PEP for 213/323 overlay.
- Implement a recorded message announcing mandatory dialing (30 days prior to mandatory dialing). *Compare* Activity No. 19 in Commission-approved funded PEP for 213/323 overlay.

These educational activities, which the industry has agreed to perform as part of the verified Application in this proceeding, readily can be compared to the activities that the Commission has required under previous funded PEPs. The Proposed Decision errs in stating otherwise.

Moreover, in addition to showing that the customer education plan set forth in the Application is comparable to funded PEPs approved by the Commission, CTIA illustrated that customer education plans equivalent to the one that the industry has agreed to undertake for the 805 NPA overlay have resulted in successful overlays in other states. In an attachment to its comments, CTIA set forth ten examples of area code overlays that were implemented successfully in other states with consumer education plans that did not include a funded PEP.¹⁷ CTIA specifically noted several instances in which those education plans were very similar to

¹⁷ See CTIA Comments, Attachment 1.

that proposed in the Application. Rather than append the record of these activities to its comments, CTIA provided the links to access the necessary websites containing such information. For example, CTIA noted that the Public Service Commission of South Carolina (“SC PSC”) approved an all-service distributed overlay of the 843 NPA with a thirteen month implementation period.¹⁸ While not ordering a funded PEP, the SC PSC required affected telephone utilities to submit their customer education plans for review. A review of the joint plan submitted by the affected utilities shows that the activities listed are nearly identical to those that the industry has agreed to perform with respect to the 805 area code overlay.¹⁹ Similarly, in 2012 the Kentucky Public Services Commission (“KPSC”) ordered an all-service overlay of the 270 NPA.²⁰ While not ordering a funded PEP, the KPSC directed the industry to develop a customer education plan and file it with the KPSC. A review of that plan shows that the activities listed are, like those in South Carolina, nearly identical to the ones that the industry has agreed to perform with respect to the 805 NPA overlay.²¹

C. The Proposed Decision Fails to Articulate how the Advantages of a Funded PEP Outweigh its Disadvantages

The Proposed Decision dismisses CTIA’s argument that the complicated bureaucracy that must be created to implement a funded PEP, including the necessity for an entity to be appointed to manage PEP funds, affords no apparent benefit to consumers by stating that “[w]e acknowledge that the creation of a PEP creates a formality that isn’t found in other jurisdictions, and we continue to find that the advantages of a PEP outweigh the disadvantages it creates.”²² While CTIA acknowledges and respects the Commission’s responsibility to ensure that

¹⁸ CTIA Comments, Attachment A, p. 1, provided link – <https://dms.psc.sc.gov/Attachments/Order/dc4f4164-155d-141f-23726356a5dea767>.

¹⁹ CTIA Comments, Attachment A, p. 1, provided link – <https://dms.psc.sc.gov/Attachments/Matter/f2a49598-155d-141f-23cd7bc57c7fc84b> (for ease of reference, a copy of the customer education plan appearing in the provided link is appended to these comments in Appendix A).

²⁰ CTIA Comments, Attachment A, p. 3, provided link – https://www.psc.ky.gov/PSCSCF/2012%20cases/2012-00129/20121217_PSC_ORDER.pdf.

²¹ CTIA Comments, Attachment A, p. 3, provided link – http://psc.ky.gov/PSCSCF/Post%20Case%20Referenced%20Correspondence/2012%20cases/2012-00129/20130215_AT%26T%20Proposed%20customer%20education%20plan.pdf (for ease of reference a copy of the customer education plan appearing in the provided link is appended to these comments in Appendix A).

²² Proposed Decision, p. 26.

consumers are sufficiently educated regarding the impacts of the 805 NPA overlay, the Proposed Decision does not explain how a funded PEP is more beneficial to consumers than the customer education plan set forth in the Application. The industry has committed to performing the educational activities set forth in Section II.B, *supra*, and the performance of such activities, without a funded PEP, has led to successful overlays in 21 other states. While the administrative tasks necessary to effect a public education program through a funded PEP may not appear excessive to the Commission,²³ these tasks require significant carrier resources, but fail to enhance consumer awareness. The Proposed Decision errs in its determination that the advantages of a funded PEP outweigh the disadvantages it creates.

III. CONCLUSION

For the reasons stated above, the Commission should modify the Proposed Decision to relieve the industry of the obligation to fund and implement the PEP set forth in Appendix A to the Proposed Decision and, in lieu thereof, require the industry to execute the customer education plan contained in the Application.²⁴

Respectfully submitted May 4, 2017, at San Francisco, California.

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3100/014/X190510.v1

²³ CTIA Comments, p. 6 (“In order for a funded PEP to function, an administrative entity with its own tax identification number, bank account, and bookkeeper hired by the industry for the purpose of collecting and disbursing the PEP funds, must be created. Carrier volunteers are then required to, among other things, oversee and manage the bookkeeper’s work, authorize disbursements, and follow up with carriers on late payments.”).

²⁴ Amended to include a requirement that the carriers with payphones shall correct the payphone signage to include updated dialing instructions at least 60 days prior to the start of mandatory dialing.

APPENDIX A



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February 14, 2014

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: In the Matter of Neustar, Inc., on Behalf of the South Carolina
Telecommunications Industry, for Approval of NPA Relief Plan for the 843 NPA
Docket No. 2013-207-C

Dear Ms. Boyd:

Enclosed for filing is a Status Report on Consumer Education Plans in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
enclosure
cc: All Parties of Record
1094989

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In the Matter of the Petition of)	
Neustar, Inc., on Behalf of the South Carolina)	Docket No. 2013-207-C
Telecommunications Industry, For Approval of)	
NPA Relief Plan for the 843 NPA)	

STATUS REPORT ON CONSUMER EDUCATION PLANS

In compliance with the Commission's December 13, 2013 Order in this Docket,¹ AT&T South Carolina respectfully submits the attached Consumer Education Plan.

This Plan is supported by the Office of Regulatory Staff and the following affected telephone utilities: Bluffton Telephone Company, Inc.; Hargray Telephone Company, Inc.; Hargray, Inc.; Farmers Telephone Cooperative, Inc.; FTC Communications, LLC; FTC Diversified Services, LLC; Home Telephone ILEC, LLC d/b/a Home Telecom; Berkeley Cable Television, Inc. d/b/a Home Telecom; Horry Telephone Cooperative, Inc.; McClellanville Telephone Company d/b/a TDS Telecom; St. Stephen Telephone Company d/b/a TDS Telecom; Palmetto Rural Telephone Cooperative, Inc.; Palmetto Telephone Communications, LLC; Sandhill Telephone Cooperative, Inc.; United Telephone Company of the Carolinas LLC d/b/a CenturyLink; Embarq Communications, Inc. d/b/a CenturyLink Communications and Qwest Communications Company, LLC d/b/a CenturyLink; Sprint Spectrum, L.P., and Sprint Communications Company L.P. (collectively, "Sprint"); ALEC, LLC (certified CLEC).

¹ This Order requires telephone utilities directly impacted by the area code overlay the Commission adopted to file a status report on their consumer education plans, and it requests the ORS to work with telephone utilities in developing these plans.

Respectfully submitted this 14th day of February, 2014.



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ATTORNEY FOR AT&T

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Relief of the South Carolina 843 Numbering Plan Area (NPA)

Proposed Customer Education Plan

843/854 NPA Overlay

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Date To Be Completed By
1	Effective date of decision approving 843 Area Code Overlay	NA	NA		COMPLETED
2	NANPA 843/854 Implementation Meeting	SC Office of Regulatory Staff and Industry	Shared		COMPLETED
3	Develop the SC 843/854 Area Code Overlay Industry Committee task force and identify volunteers (co-chairs) to lead the industry committee calls.	Industry	Shared		COMPLETED
4	A Press Release announcing the new 843 Area Code Relief Plan	Statewide	Shared		June 2014
5	Initiate monthly industry committee calls	SC Office of Regulatory Staff and Industry	Co-chairs		July 2014
6	Overlay information distributed internally as job aid for customer service representatives/frontline personnel to answer customer questions. There should not be a need for Representatives to refer questions to the SC Office of Regulatory Staff.	Customer Service Representatives /frontline personnel	Individual		January 2015
7	843/854 Overlay update to industry websites.	All Carriers	Individual		January 2015
8	Special Letters sent out to inform the start of permissive dialing period: Letters to the Directory Publishers, Coin Phone Providers, Alarm Association, and 911 County Coordinators /PSAPs.	Industry Committee	Shared		February 2015
9	Customer Notification No. 1: Announce the new Area Code plan. Include permissive dialing information about 10-digit dialing and indicate the affected areas.	All Carriers	Individual		February 14, 2015
10	News release describing 843/854 Area Code relief plan for distribution within the 843 Area Code.	All Carriers/PSC	Shared		March 9, 2015
11	Begin Permissive Dialing				March 14, 2015
12	Second Special Letters sent out to inform the start of mandatory dialing: Letters to the Directory Publishers, Coin Phone Providers, Alarm Association, and 911 County Coordinators & PSAPs.	Industry Committee	Shared		August, 2015

Relief of the South Carolina 843 Numbering Plan Area (NPA)

Proposed Customer Education Plan

843/854 NPA Overlay

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Date To Be Completed By
13	Customer Notification No. 2: Final notification to alert the mandatory local 10 digit dialing changes in the affected areas and the activation of the new 854 Area Code.	All Carriers	Individual		August 19, 2015
14	Complete implementation of recorded announcement equipment in preparation for mandatory dialing.	All Carriers	Shared		August 19, 2015
15	News release describing start of mandatory 10-digit local dialing begins in the 843 area code region.	Statewide	Shared		September 14, 2015
16	Begin Mandatory Dialing	All Carriers	Shared		September 19, 2015
17	The new 854 NPA Code Activation begins: New 854 telephone numbers can be assigned and implementation completed				October 19, 2015

1099913



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February 14, 2013

VIA OVERNIGHT MAIL

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

RECEIVED

FEB 15 2013

PUBLIC SERVICE
COMMISSION

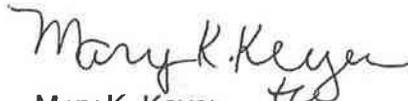
Re: Application of the North American Numbering Plan Administrator, on
Behalf of the Kentucky Telecommunications Industry, for Relief of the 270
Numbering Plan Area
PSC Administrative Case No. 2012-00129

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of a proposed customer education plan for implementation of the 270 area code overlay filed on behalf of BellSouth Telecommunications, LLC d/b/a AT&T Kentucky, AT&T Mobility, AT&T Corp., Teleport Communications America, LLC, Ballard Rural Telephone Cooperative Corporation, Inc., Sprint Spectrum, L.P., and Sprint Communications Company L.P., PowerTel/Memphis, Inc. d/b/a T-Mobile USA, T-Mobile Central LLC d/b/a T-Mobile USA, and Verizon Wireless and MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (collectively "Verizon") in compliance with the December 17, 2012, Order of the Public Service Commission in the above-referenced case. I have received permission from counsel for the aforementioned parties to file this on their behalf.

If you have any questions or need additional information, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

1072793

Administrative Case No. 2012- 00129 – Relief of the 270 Numbering Plan Area

Proposed Customer Education Plan

(BellSouth Telecommunications, LLC d/b/a AT&T Kentucky, AT&T Mobility, AT&T Corp., Teleport Communications America, LLC, Ballard Rural Telephone Cooperative Corporation, Inc., Sprint Spectrum, L.P., and Sprint Communications Company L.P., PowerTel/Memphis, Inc. d/b/a T-Mobile USA, T-Mobile Central LLC d/b/a T-Mobile USA, and Verizon Wireless and MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (collectively “Verizon”))

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Date To Be Completed By
1	Effective date of decision approving 270 area code overlay.	NA	NA		December 17, 2012
2	NANPA 270 Implementation Meeting.	KPSC Staff and Industry	Shared		January 10, 2013
3	Email to industry asking for participation on task force and subcommittees.	Industry	Shared		January 11, 2013
4	Overlay information distributed internally as job aid for customer service representatives to answer customer questions. There should not be a need for Representatives to refer questions to the KPSC.	Customer Service Representatives	Individual		June 3, 2013
5	270 overlay update to industry websites.	All Customers	Individual		June 3, 2013
6	Customer Notification No. 1: Announce the new area code plan. Include information about 10-digit dialing and indicate the affected areas.	All Customers	Individual		July 3, 2013
7	News release describing 270 area code relief plan for distribution within the 270 area code.	All Customers	Shared		July 29, 2013
8	Begin Permissive Dialing				August 3, 2013
9	Published Directories: Add information on directory cover to alert customers in 270 area code.	All Customers	Individual		As books are published
10	Complete implementation of recorded message announcing mandatory dialing.	All Customers	Shared		December 1, 2013
11	Correct payphone signage to include updated dialing instructions.	All Customers	Individual		December 31, 2013
12	Customer Notification No. 2: Announce the new area code plan. Include information about 10-digit dialing and indicate the affected areas.	All Customers	Individual		January 1, 2014

Administrative Case No. 2012- 00129 - Relief of the 270 Numbering Plan Area

Proposed Customer Education Plan

(BellSouth Telecommunications, LLC d/b/a AT&T Kentucky, AT&T Mobilty, AT&T Corp., Teleport Communications America, LLC, Ballard Rural Telephone Cooperative Corporation, Inc., Sprint Spectrum, L.P., and Sprint Communications Company L.P., PowerTel/Memphis, Inc. d/b/a T-Mobile USA, T-Mobile Central LLC d/b/a T-Mobile USA, and Verizon Wireless and MClmetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (collectively "Verizon"))

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Date To Be Completed By
13	News releases to media serving 270 area code and adjacent area codes and statewide regarding the start of mandatory dialing.	Statewide	Shared		January 27, 2014
14	Begin Mandatory Dialing				February 1, 2014
15	364 numbers assigned and implementation completed.				March 3, 2014