

## S T O L L · K E E N O N · O G D E N

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December 6, 2007

DEC 1 0 2007 PUBLIC SERVICE COMMISSION

RECEIVED

Elizabeth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602-0615

## Re: Case No. 2006-00357 -- The Application of NANPA on behalf of the Kentucky Telecommunications Industry for Approval of the NPA Relief Plan for the 270 NPA, and Number Conservation Measures within Kentucky.

Dear Ms. O'Donnell:

We are counsel to T-Mobile Central LLC and Powertel Memphis, Inc., collectively doing business as T-Mobile. The purpose of this letter is to advise the Commission that T-Mobile, Verizon Wireless, and Sprint Spectrum L.P. d/b/a Sprint PCS, Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners, jointly referred herein as "Wireless Carriers," support the Motion for Reconsideration filed by AT&T on November 30, 2007 in the above referenced matter ("AT&T Motion").

The AT&T Motion describes many of the technical and operational problems which could result from beginning permissive dialing related to a planned area code split on January 1, 2009, a federal holiday. In addition to the concerns identified in the AT&T Motion regarding the present date set for the beginning of permissive dialing, the Wireless Carriers have additional concerns regarding the potential choice of an alternative date that is too early. While the date is still more than a year away, the Wireless Carriers urge the Commission to give prompt consideration to the AT&T Motion and to choose one of AT&T's proposed dates in February or March of 2009 for the beginning of permissive dialing and not one of the earlier dates proposed by AT&T, for the reasons stated herein.

As the Commission and all other state commissions across the country are aware, any dialing change related to area code relief will directly affect telecommunications users. As a result, commissions and the carriers take considerable efforts to ensure that consumers are informed and given a sufficient amount of time to understand the changes which are to occur as a

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result of the area code relief. The permissive dialing phase is a transition period designed to coincide with the consumer education campaign to allow callers to grow accustomed to using the new area code while still allowing calls using the "old" area code. The permissive period should be long enough to permit consumers to learn about the new area code and dialing requirements, but not so long as to make the transition appear indefinite and cause consumers to lose focus on the upcoming change. The effect of an extended transition period may have the unintended effect of increasing confusion and generating more consumer complaints once mandatory dialing is implemented. The Wireless Carriers believe that, in light of the recent delay of the date for beginning mandatory dialing, it would be unwise to begin permissive dialing before February of 2009.

The February and March 2009 dates delineated in the AT&T Motion are preferable to the Wireless Carriers since those dates provide a sufficient and standard amount of time for consumers to become familiar with the dialing pattern changes associated with an area code split. In addition, the February and March 2009 dates may minimize negative reaction to the area code split – and the corresponding concerns and complaints generated to the industry and the Commission.

On behalf of their respective customers the Wireless Carriers respectfully request that the Commission grant the AT&T Motion and choose one of the specified alternate February or March 2009 dates included therein. Such a decision will avoid confusion and concerns not only for the customer of the Wireless Carriers but all Kentucky telecommunications users. I have been authorized to file this letter on behalf of Verizon Wireless, Sprint PCS and Nextel Partners.

Very truly yours,

STQLL KEENON OGDEN PLLC Douglas F. Brent Counsel to T-Mobile

cc: parties of record