

**BellSouth Telecommunications, Inc.**  
601 W. Chestnut Street  
Room 407  
Louisville, KY 40203

Mary.Keyer@BellSouth.com

**Mary K. Keyer**  
General Counsel/Kentucky

502 582 8219  
Fax 502 582 1573

July 3, 2007

**RECEIVED**

**JUL 05 2007**

**PUBLIC SERVICE  
COMMISSION**

Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

Re: The Application of NANPA on Behalf of the Kentucky Telecommunications Industry for Approval of NPA Relief Plan for the 270 NPA, and Number Conservation Measures within Kentucky  
PSC 2006-00357

Dear Ms. O'Donnell:

Enclosed for filing are the original and ten (10) copies of Comments of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky.

Sincerely,

  
Mary K. Keyer

Enclosures

cc: Parties of Record

683221

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF NANPA ON BEHALF OF THE )  
KENTUCKY TELECOMMUNICATIONS INDUSTRY ) CASE NO.  
FOR APPROVAL OF NPA RELIEF PLAN FOR THE ) 2006-00357  
270 NPA, AND NUMBER CONSERVATION )  
MEASURES WITHIN KENTUCKY )

COMMENTS

On June 15, 2007, the Commission issued an order in this case inviting carriers to 1) comment on the implementation of mandatory thousands-block pooling within the current 270 NPA, and 2) notify the Commission of any rate centers in which they claim an exemption from the mandatory pooling requirement. Following are the comments of BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky (“AT&T Kentucky”):

Implementation of Mandatory Thousands-Block Pooling

AT&T Kentucky incorporates by reference the comments it filed with the Commission on number pooling on April 5, 2007, expressing concerns about the effectiveness of number pooling in extending the life of the 270 NPA.

Should the Commission decide to move forward with implementation of mandatory thousands-block number pooling, AT&T Kentucky recommends that implementation begin immediately. The implementation period for number pooling normally requires a six-month interval. Commencing implementation immediately will allow the industry to complete implementation at or near the end of 2007, and allow enough time for affected carriers to complete the work necessary to implement permissive dialing for the geographic split by the scheduled date of July 1, 2008.

Immediate implementation will also allow NANPA to gather the data it needs to give the Commission a timely estimate on how long mandatory number pooling will extend the life of the 270 NPA.

Relative to the schedule for implementation of the geographic split, AT&T Kentucky encourages the Commission to establish a date now for implementation of mandatory dialing, which AT&T Kentucky recommends be February 1, 2009. The industry norm is for the mandatory dialing date to follow the permissive dialing date by six months. Because of the extensive work required in the last month before implementation of mandatory dialing, AT&T Kentucky recommends a seven-month interval so that this work can be completed in January rather than in December when many employees are on vacation. A February 1, 2009, date would also avoid the customer confusion that might accompany an implementation date during the holiday season.<sup>1</sup>

#### Rate Centers for which AT&T Kentucky Claims an Exemption

AT&T Kentucky claims an exemption for the following 16 Rate Centers because AT&T Kentucky is the sole service provider with number assignments in each rate center:

---

<sup>1</sup> AT&T Kentucky recommends that the Commission establish a date now for mandatory dialing because customers need a date certain in order to plan for all of the adjustments that accompany a geographic split. These adjustments include communicating to customers, family and friends their new numbers; changes in advertising for businesses, hospitals, schools, and government offices; changes in Yellow Pages and White Pages directory listings; and reprogramming of fax machines, Internet dial-up numbers, alarm circuits, speed dialing, call forwarding, cell phones, and pagers.

Bremen  
Corydon  
Habit  
Hebbardsville

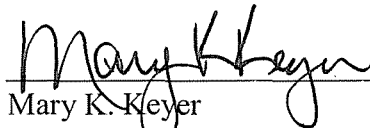
Island  
Lafayette  
Maceo  
Panther

Pleasant Ridge  
Robards  
Sacramento  
Sorgho

Utica  
West Louisville  
Whitesville  
Woodburn

If the Commission chooses to implement mandatory thousands-block number pooling, AT&T Kentucky requests that the implementation begin immediately and that the AT&T Kentucky rate centers identified herein be exempted.

Respectfully submitted,



---

Mary K. Keyer  
601 W. Chestnut Street, Room 407  
P. O. Box 32410  
Louisville, KY 40232  
Telephone No.: (502) 582-8219

COUNSEL FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.  
d/b/a AT&T KENTUCKY

683217

**CERTIFICATE OF SERVICE KPSC 2006-00357**

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 3rd day of July, 2007.

Edward T. Depp  
Dinsmore & Shohl, LLP  
1400 PNC Plaza  
500 W. Jefferson Street  
Louisville, KY 40202

Kimberly Miller  
Director, Reg. Law & Public Policy  
NeuStar, Inc.  
Suite 600  
2000 M Street, N.W.  
Washington, DC 20036

  
\_\_\_\_\_  
Mary K. Keyer