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October 27, 2006

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**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 BellSouth's Comments filed pursuant to the Commission's September 27, 2006 Order in the above-referenced case.

BellSouth is filing this document only with the Commission. Due to the length of the service list, BellSouth requests the Commission notify us if further distribution is necessary.

Sincerely,


Mary K. Keyer

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

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

COMMENTS

On September 27 and October 6, 2006, the Commission issued an order and a corrected order, respectively, in this case in which it invited industry representatives to notify the Commission if they wish to participate in this proceeding and to file comments regarding the choices of relief identified in the North American Numbering Plan Administration's (NANPA's) original filing with the Commission on July 25, 2001 (Administrative Case No. 388). BellSouth Telecommunications, Inc. ("BellSouth") hereby notifies the Commission that it wishes to participate in this proceeding and submits the following comments.

NANPA's July 2001 filing was a petition asking the Commission to approve an all-services distributed overlay relief plan that had been recommended by a group of industry participants that included BellSouth. NANPA also identified the industry's second choice for relief as a north to south geographical split identified as "Alternative # 4A." In its filing, NANPA described the five geographic split plans and the overlay plan the industry group had considered, and in Exhibit A of that filing provided the minutes of the industry meeting that provided some of the discussion of the alternatives and reasons why some of the alternatives were rejected.

The six alternatives considered in 2001 are the same six alternatives that are under consideration in this case. BellSouth fully endorses the overlay plan recommended by the industry for relief of the 270 NPA.

Comparative Benefits of an Overlay

The comparative benefits of overlay and geographic split plans are documented in Exhibit A, Attachment 2 of NANPA's July 2001 filing. In short, an overlay plan provides area code relief without any customer having to change his number (and possibly incur additional expense to change stationery, business cards, and signage unless that signage contains only seven digits in a telephone number). An overlay plan does require all customers to dial ten digits (instead of seven digits) to make local calls. It should be noted, however, that 10-digit local dialing promotes a uniform dialing plan that is consistent with the industry's dialing plan recommendations. Mandatory 10-digit local dialing is also becoming more ubiquitous as overlay relief plans are implemented throughout the country. Perhaps the greatest advantage of an overlay relief plan is that subsequent relief is accomplished by merely adding additional NPAs to cover the same geographic area. This prevents the further division of NPA areas into smaller and smaller geographical areas as is necessary with geographic splits and also eliminates the need for industry input regarding future NPA relief.

Additional advantages of an overlay over a geographic split include:

1. No political and economic controversies over where to draw the line between NPAs.
2. No political and economic controversies over which area keeps the old NPA code and which area receives a new NPA code.

3. No decision necessary on whether the two resulting NPAs from the split should dial seven or ten digits for new (or existing) inter-NPA local calling arrangements.
4. Compared to the other relief alternatives the overlay plan provides the longest projected time period (17 years) before additional NPA relief is needed.
5. An overlay relief plan can typically be implemented faster than a geographic split. The implementation of a split requires extensive coding changes in Operational Support Systems (OSSs) to handle the transfer of existing NXX codes from the exhausting NPA to the new NPA. A split also introduces the potential for trunking impacts associated with E911 and Operator Services. The current NANPA estimate for exhaustion of the 270 NPA is the 4th quarter of 2007 – only about a year from now. In light of NANPA’s projected exhaustion date, the implementation of any relief alternative will likely need to be expedited. The Industry recommended an overlay implementation period of 19 months with 12 months needed for network preparation. BellSouth submits that it could most likely implement either an overlay or a geographic split plan with a 12-month network preparation period. The implementation period for an overlay could possibly be reduced by as much as 3 to 4 months, but 12 months is the minimal network preparation period for BellSouth’s implementation of a geographic split.

BellSouth’s Experience with Overlays

BellSouth’s experience with overlays has been primarily in the relief of urban NPAs, such as Atlanta, Charlotte, Miami, Ft. Lauderdale, and Orlando. There have been, however, overlays implemented in both Mississippi (a state very similar to Kentucky in its rural nature)

and Georgia since 2004. In March 2004, the Mississippi Public Service Commission approved an industry recommendation to implement an overlay to relieve the 601 NPA that covers the southern half of Mississippi excluding the gulf coast area. In June 2005 the Georgia Public Service Commission ordered the implementation of an overlay as recommended by the industry for relief of the 706 NPA that covers much of north and central Georgia except for the Atlanta area. Both the Mississippi 601 overlay and the Georgia 706 overlay covered largely rural areas and no large Metropolitan Statistical Areas (MSAs). BellSouth notes that it has experienced very few problems and/or customer complaints associated with the implementation of overlays in its serving area. BellSouth suggests that the Kentucky Commission may benefit by asking the Mississippi and Georgia Commissions to comment on their experiences in implementing overlays for relief of predominately rural geographic areas.

Comments on Split Alternatives

As noted previously BellSouth fully supports the all-services distributed overlay plan recommended by the industry for relief of the 270 NPA. BellSouth provides the following comments concerning the split alternatives in the event the Commission decides to order a geographic split for relief of this NPA.

BellSouth can accept and implement the Alternative # 4A NPA split, which is the industry's second choice alternative, but prefers Alternative # 4 for the reasons outlined below. BellSouth has two concerns with Alternative # 4A. The first concern involves the significant difference in the projected lives of the two NPAs with Alternative # 4A. NANPA's July 18, 2006 filing with the Commission provided updated projected lives for the various relief alternatives considered by the industry. The updated Alternative # 4A shows the projected life for Area A (east side of the split boundary) to be 13 years and the projected life for Area B to be

23 years, a difference of 10 years. Section 5.0.g of the industry's NPA Code Relief Planning & Notification Guidelines document includes the following statement regarding NPA relief plans:

In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

The 10 year difference in the projected lives for the two NPAs within Alternative # 4A should be avoided in accordance with the relief planning guidelines. Furthermore, Alternative # 4A would still require additional NPA relief in just 13 years which is the shortest period for additional relief of any of the various relief alternatives.

BellSouth's second concern with Alternative # 4A is that it would split BellSouth's Hopkinsville switch cluster that includes the Bluff Springs, Cadiz, Canton, Crofton, Elkton, Gracey, Guthrie, Hopkinsville, Lafayette, Pembroke, Sharon Grove, and Trenton exchanges. The splitting of this switch cluster would require BellSouth to complete incremental translations work in the impacted switches in order to accommodate the split.

In light of these concerns with Alternative # 4A, BellSouth prefers the Alternative # 4 NPA split modified to include the Hebbardsville exchange included in Area B (the west side of the proposed split boundary). The Hebbardsville exchange has 7-digit Extended Area Service (EAS) calling to the Corydon, Henderson, and Robards exchanges and needs to be included in Area B to avoid splitting of the EAS route, thereby continuing 7-digit dialing for EAS calling.¹ This alternative is different from Alternative # 4A in that it would include the Bremen, Central City, Drakesboro, Elkton, Greenville, Guthrie, Sharon Grove, and Trenton exchanges in Area B

¹ BellSouth notes that adoption of any of the proposed split alternatives will result in local calling to extended local calling areas in the other NPA area for customers of Area Calling Service. BellSouth recommends that all inter-NPA local calling be on a 10-digit basis.

rather than Area A. This would result in more balanced projected lives for the two NPAs with NANPA's projections indicating only a three year difference for Alternative # 4. No EAS dialing arrangements would be split with this modified Alternative # 4 that includes the Hebbardsville exchange in Area B.

If a geographic split is ordered by the Commission, BellSouth should be able to follow the 19-month implementation period recommended by the industry for implementation of an overlay. This includes 12 months for network preparation, 6 months for a permissive dialing period and one month after mandatory dialing is implemented before an NXX code from the new NPA can be assigned. BellSouth should be able to complete the necessary network preparation and Operational Support System modifications for a geographic split in the same 12-month period included for this work in the industry's recommended implementation schedule for an overlay. However, BellSouth would not be able to further expedite this 12-month network preparation period for implementation of a split as could be done for an overlay. BellSouth notes that the permissive dialing period for a split allows calls to the NXX codes that are moving from the old NPA to the new relief NPA when the split occurs to be dialed using either 7 or 10 digits. Once mandatory dialing is implemented with a split, all calls between the old NPA and the new relief NPA (inter-NPA calls) must be dialed using 10 digits. BellSouth supports the elimination of 7-digit dialing for local calls across NPA boundaries once mandatory dialing has been implemented.

Conclusion

BellSouth endorses the overlay alternative for relief of the 270 NPA. If the Commission chooses one of the proposed split alternatives, BellSouth supports Alternative # 4, with the

modification of moving Hebbardsville from Area A to Area B. BellSouth will support and implement any of the proposed relief alternatives the Commission chooses.

If the Commission chooses an overlay, BellSouth prefers a 12-month period to implement the necessary network modifications, but if necessary, those modifications could possibly be completed in eight or nine months. For a split alternative, BellSouth will need a minimum of 12 months to make the necessary network modifications.

If after reviewing BellSouth's comments and those of other industry participants, the Commission has additional questions or need for further information, BellSouth will be glad to provide any additional input the Commission requests.

Respectfully submitted,



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