

AREA CODE RELIEF FOR SUFFOLK COUNTY, NEW YORK

A DESCRIPTION OF OPTIONS

CASE 14-C-0182

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**STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE**

**AN OPTIONS PAPER FOR AREA CODE RELIEF IN
SUFFOLK COUNTY, NEW YORK**

BACKGROUND

The 631 area code that has served Suffolk County since it split from the 516 Numbering Plan Area (NPA) is running out of assignable telephone numbers, and implementation of a new area code is necessary. Demand for central office codes in the 631 NPA is expected to result in the depletion of these codes by the first quarter of 2016. Therefore, Commission action is necessary to ensure the continued availability of telephone numbers in the area currently served by the 631 area code. The Commission's goal is to provide long-term area code relief while causing the least possible disruption to consumers and businesses in the area.

The purpose of this Paper is to present what the Staff of the New York State Department of Public Service (DPS Staff) believes are the best options for providing additional telephone numbering resources for the 631 NPA. The Department of Public Service, through the Administrative Law Judge (ALJ) assigned to this case, is seeking comment from telecommunications providers and the general public on the area code relief options outlined in this Paper.

The views contained in this Paper are DPS Staff views and have not been reviewed by the Commission. It is expected that recommendations to the Commission on providing area code relief in the 631 NPA will be made by early autumn, and that the Commission may make a determination in this matter shortly thereafter. This timeframe will allow sufficient time for the telephone companies to make the necessary network changes and to permit customers to get used to new dialing patterns before the new area code is fully implemented. The Commission may approve either of these options, a modified version of these options, or entirely different plans. Regardless of the option that is ultimately adopted, consumer rates will *not* be affected.

DISCUSSION

A telephone number has ten digits and is composed of three parts: a three-digit Numbering Plan Area (NPA), or area code; a three-digit NXX or central office code; and a four-digit station number (i.e., 631 555-1212). Three-digit central office codes are assigned to specific geographic areas, or rate centers, within each NPA. These central office codes cannot be used elsewhere within the NPA, nor can seven-digit telephone numbers (NXX code plus individual station number) be assigned to end-users outside of their home rate center.

Approximately 727 of the 792 central offices codes available for assignment in the 631 area code have already been assigned to telecommunications carriers, leaving only 65 NXX codes available for assignment as of May 2014. Each NXX code contains approximately 10,000 assignable seven-digit telephone numbers.

In areas where number exhaust has been predicted, new area codes in a given geographic area are generally provided in either of two ways: an overlay¹ or through a geographic split of the existing area code. In 2000, the 631 NPA was projected to be in exhaust (out of assignable NXX codes) by the third quarter of 2002, and the North American Numbering Plan Administrator (NANPA)² prepared several relief options, including two overlays and a geographic split, for consideration by the telecommunications industry. However, before any further action was taken, several numbering conservation efforts were implemented, such as reclamation of underused NXX codes and pooling of numbers, and the projected exhaust date was subsequently revised to the point that relief was no longer required.

While telecommunications industry guidelines indicate that an overlay is the preferred option, geographic splits are also discussed in the Industry Numbering Committee's Area Code Relief Planning Guidelines³, and, therefore, Staff has examined the geographic split option included in the industry petition. Staff was unable to formulate an alternative split option. DPS Staff requests that the industry and the general public provide comment concerning each of

¹ An overlay option means that one new code is used throughout the entire geographic area for all new telecommunications services; existing phone numbers generally are not affected.

² Among the many number administration duties assigned to it by the Federal Communications Commission, the North American Numbering Plan Administrator oversees area code relief planning.

³ ATIS-0300061, issued March 14, 2014. The Industry Guidelines do not permit the splitting of rate centers in favor of other kinds of geographic splits, such as municipal boundaries.

the options, including which area should retain the 631 area code under the geographic split option.

PROPOSED OPTIONS

OVERLAY PLAN – Option 1

Description

An overlay plan assigns a new area code to a given geographic area. Area code relief is provided by opening up a new code throughout the geographic area of the existing code, in effect, “overlying” it. Central office codes from the new area code are assigned as needed on a carrier-neutral (i.e., first-come, first-served) basis for new service requests. Existing customers (wireline or wireless) are not required to change their area codes or seven-digit telephone numbers.

The overlay plan provides long-term area code relief, avoids any forced number or area code changes for existing customers, and is easily replicable. Current projections indicate that a single overlay for Suffolk County would provide area code relief for an estimated 45 years.⁴

If an overlay code is adopted, current Federal Communications Commission regulations require 10-digit dialing within the geographic area of the existing code (i.e., any call made in the current 631 area would now require dialing an area code).⁵ This regulation is intended to provide a more level playing field among carriers competing in the same geographic region.

Advantages of the Overlay

- An overlay code avoids the need for any current customers to change their area code.
- An overlay is easily replicable; if required, additional relief overlay area codes could be implemented relatively simply. Consumers would not be required to change their area code as the 631 NPA continues to grow.
- The overlay would spare thousands of wireless customers from having to bring their wireless devices to their service provider for reprogramming with a new area code.

⁴ Since an overlay does not require the formulation of specific geographic boundaries, there are no accompanying maps in the attachment to this paper associated with this option.

⁵ FCC rule 47 CFR 52.19 (c)(3)(ii).

Disadvantages of the Overlay

- Some consumers may believe it is inconvenient to have to dial 10 digits on all calls.
- Consumers may be confused by having to dial area codes to reach telephone numbers located nearby, in the same building or neighborhood, for example.

GEOGRAPHIC SPLITS - Option 2

Description

A geographic split would divide the existing 631 code area into two geographic areas, leaving the existing area code to serve one portion and assigning a new area code to the remaining portion. Where this method has been used, the line drawn between the areas has often followed a clearly identifiable jurisdictional, natural, or physical boundary, such as town and county boundaries, and bodies of water, although current regulations require split lines to follow rate center boundaries.

Staff has adopted the industry petition approach to splitting the 631 area code on a geographic basis, taking into consideration the projected life of the area codes (exhaust dates) on each side of the proposed split and communities of interest within the geographic area. Attachment 1 contains two maps for the split option; one showing municipal boundaries, and the other showing rate center boundaries. The split line would run north to south along the western edges of the Smithtown, Central Islip and Islip rate centers.

Advantages of a Geographic Split

- A geographic split would retain the identification of certain locales with a single area code, thereby avoiding the potential confusion associated with the use of multiple area codes in a single neighborhood, building, or even household or business.
- A geographic split does not require all consumers to dial 10 digits within the same area code. Customers would continue to dial seven digits within their respective area code.

Disadvantages of the Geographic Split

- Approximately half of the currently-assigned telephone numbers in the 631 area code, including numerous businesses, would be required to adopt a new area code, including

the need to change advertising and other materials which contain their telephone number.

- Thousands of wireless customers who would be located in the new area code would have to bring their wireless devices to their service providers for reprogramming with the new area code.
- Future area code exhaust could require additional splits to smaller and smaller areas without clearly recognizable geographic boundaries.
- Consumers would be required to dial an area code for approximately half the numbers that were previously dialable on a seven-digit basis.

Staff believes that the third option presented in the industry petition, a concentrated growth overlay, is unnecessarily complicated and confers no advantage over a distributed overlay.

CONSUMER OUTREACH AND EDUCATION

During the course of the proceeding, DPS Staff will conduct a comprehensive public information and involvement program. The objectives will be to inform affected consumers of the need for a new area code in Suffolk County, receive feedback on consumer preferences regarding the alternatives presented in this White Paper, and to otherwise hear comments related to the need for another code in the region. That effort includes information about the 631 case on the AskPSC.com website, sending mailings to targeted stakeholders in the affected counties, and providing information at meetings and events. DPS Staff will also schedule informational forums prior to public statement hearings which will be held in various locations in the 631 NPA during the summer of 2014. The public statement hearings will be held by the Administrative Law Judge and will provide an opportunity for the public to comment on a formal, transcribed record. Specific dates, times and locations of the public statement hearings will be provided by Notice published on the Department's website and disseminated through mailings and press releases.

In addition to speaking at a public statement hearing, consumers may comment in several other ways:

1. By writing a letter addressed to Kathleen H. Burgess, Secretary, New York State Public Service Commission, 3 Empire State Plaza, Albany, New York 12223-1350;
2. By calling the PSC's toll-free Opinion Line (1-800-335-2120) and leaving a comment on the recording; or
3. By commenting online at www.AskPSC.com.

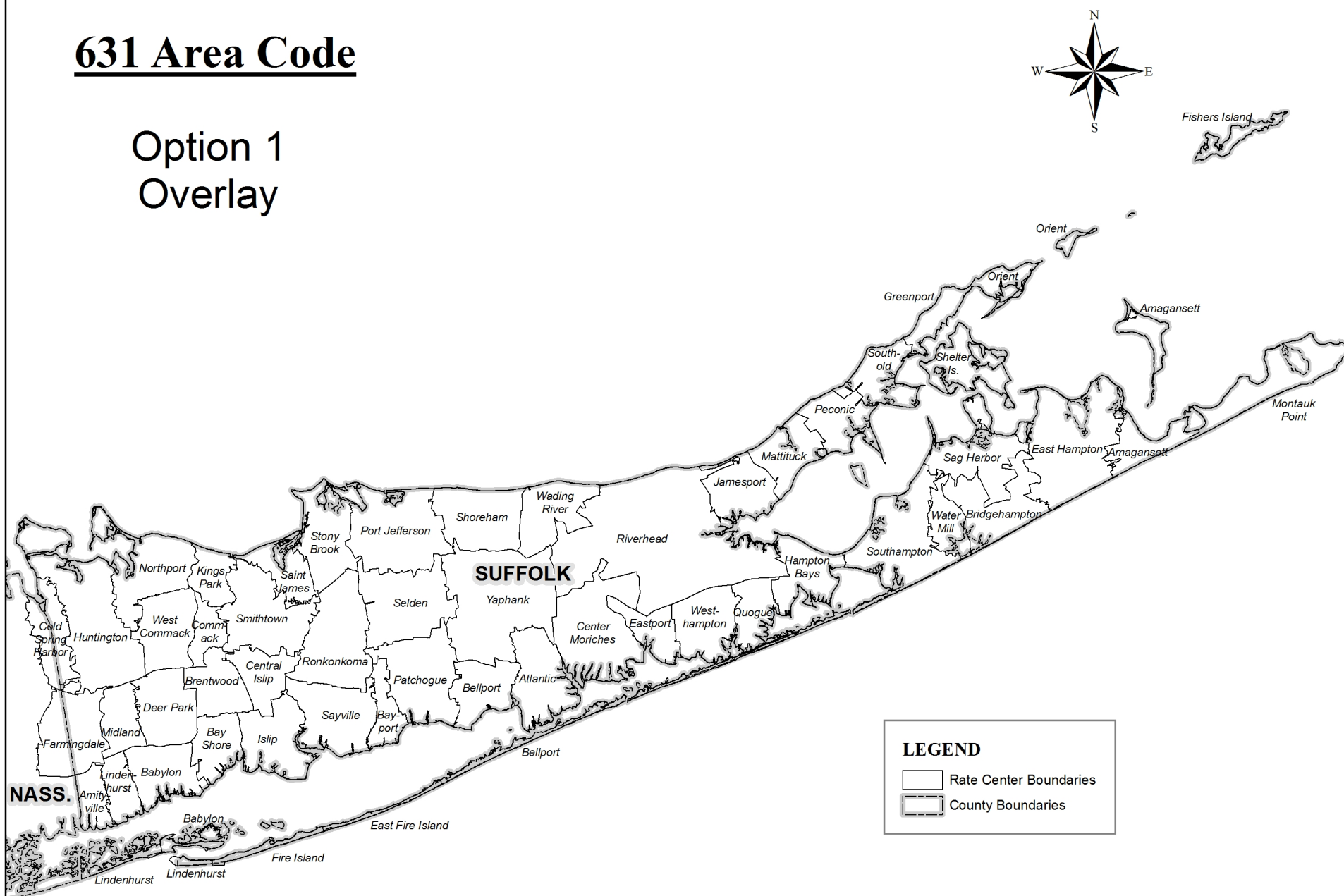
All comments should reference the "631 Area Code Case" and/or "Case 14-C-0182." All of these comments will become part of the formal record in the case.

CONCLUSION

This Paper states no preference as to the method of providing area code relief (i.e., split or overlay) in the 631 NPA. Comments are sought from all those affected, including residents, businesses and organizations in the region, on the proposals contained herein as well as on which geographic area should retain the existing 631 code in the event a geographic split is adopted. This feedback will be used to make an informed recommendation to the Commission.

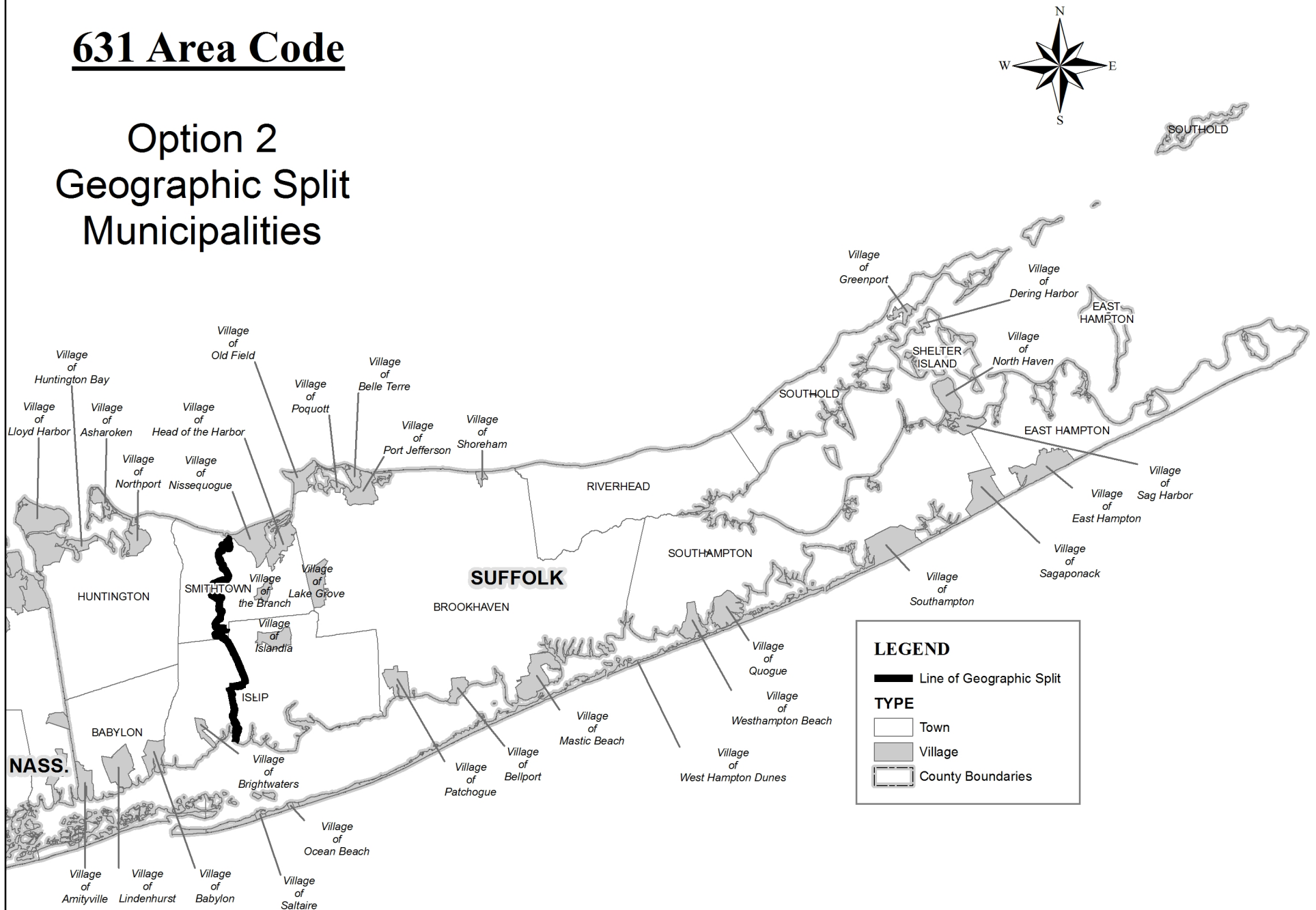
631 Area Code

Option 1 Overlay



631 Area Code

Option 2 Geographic Split Municipalities



631 Area Code

Option 2 Geographic Split Rate Centers

