

Indiana Utility Regulatory Commission Public Field Hearing

317 Area Code Relief Case

IURC Cause Number 44513

If you would like to comment for the record in this case you must complete this form.
Testimony is welcome whether it is oral and/or written. (Both carry equal consideration.)

(Please print)

NAME ALAN MATSUMOTO

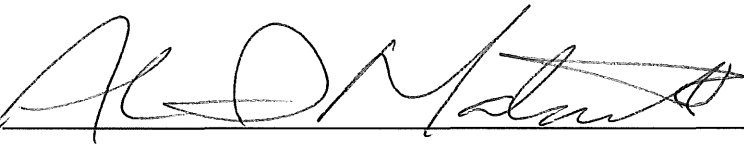
ADDRESS 13114 CONNER KNOWL PICKWY, FISHERS, IN. 46038

Are you a customer of this utility? *(circle one)* YES NO

Do you wish to speak or provide written comments? *(circle one)* SPEAK WRITTEN BOTH


If you are representing any firm or organization, please provide the name:

INDIANA TELECOMMUNICATIONS ASSOCIATION

SIGNATURE:  DATE: 12/1/14

I OFFER THE FOLLOWING WRITTEN TESTIMONY:

(You may make both written and oral comments.)

IURC
PUBLIC'S
EXHIBIT NO. G-FH-1
12-1-14 
DATE REPORTER

OFFICIAL
EXHIBITS

You may continue your comments on the back of this sheet or attach them.

You may also send comments to the OUCC at:

Indiana Office of Utility Consumer Counselor
115 W. Washington St., Suite 1500 South
Indianapolis, IN 46204

web: www.IN.gov/OUCC
email: uccinfo@oucc.IN.gov
fax: (317) 232-5923



You can go directly to the OUCC's electronic contact form by scanning this code:

Comments provided in this cause are considered public records pursuant to the Indiana Access to Public Records Act (Indiana Code 5-14-3-1, *et seq.*).

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF
NEUSTAR, INC., ON BEHALF OF THE
INDIANA TELECOMMUNICATIONS
INDUSTRY, FOR APPROVAL OF NPA
RELIEF PLAN FOR THE 317 NPA

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CAUSE NO. 44513

**FIELD HEARING COMMENTS OF THE INDIANA
TELECOMMUNICATIONS ASSOCIATION**

September 2014

Introduction

The Indiana Telecommunications Association (“ITA”) submits these comments in support of the all-services distributed area code overlay as the recommended solution for 317 area code relief.

The Industry considered two concentrated overlays: (1) an area code overlay that would be assigned to only the Indianapolis rate center; and (2) an area code overlay for just the Indianapolis and adjacent rate centers¹. The Industry rejected the concentrated overlays, because these alternatives would require two rounds of customer education notices and two area code relief efforts, thereby increasing the potential for customer confusion. In addition, a concentrated overlay requires customers inside the overlay area to dial 10-digits immediately, while maintaining 7-digit dialing outside of the concentrated overlay area.

Benefits of Overlay - Providers

The all-services distributed overlay plan allows all current customers to retain their telephone numbers indefinitely, does not split cities, counties or communities of interest, minimizes most cellular and wireline telephone reprogramming, involves minimal administrative burdens and costs for residential and business customers alike, provides a long period of area code relief, and generally operates in a manner that is fair and equitable to all parties. The all-services distributed overlay is therefore the optimal method for area code relief and can be implemented in a relatively short time frame, to provide new numbering resources on a non-discriminatory basis to all service providers.

¹ Carmel, Fishers, Oaklondon, Cumberland, Action, Greenwood, West Newton, Plainfield, Brownsburg and Zionsville.

Benefits of Overlay - Customers

Under the industry's all-services distributed overlay proposal, a second new Numbering Plan Area ("NPA" or area code) would cover the entire 317 geographic area. Numbering resources served from the new overlay area code would be available for assignment equally to all carriers on a first-come first-serve basis. Customers would be able to keep their area code and seven-digit number, rather than be inconvenienced by having to change their phone numbers. There would be no need to make changes to stationery, business cards, advertising, websites or records (unless they currently show only seven-digit numbers). There would be no impact on business databases that use the full ten-digit telephone number as a search criteria, e.g., airlines, doctors, utilities, grocery reward programs, pharmacies, etc. The all-services distributed overlay would also prevent economic harm to businesses with nationally published numbers for manufacturing, distribution centers, etc.

The all-services distributed overlay approach maximizes the length of time before another NPA is required to provide area code relief because the assignment of prefixes follows the demand – this ensures that all service providers have the opportunity to obtain adequate numbers for their customers when needed, and customers are able to obtain numbers from their service provider of choice.

In addition, once an overlay area code is implemented, it is relatively simple to implement an additional new overlay area code in the same geographic area in the future when needed, because customers will already be familiar with the overlay concept and 10-digit dialing. Additional overlay area codes have already occurred in Houston, TX; Baltimore, MD; Atlanta, GA; and New York City, NY.

When an overlay area code is implemented, the FCC requires that ten-digit dialing be implemented for all local calling within the overlay area. This ten-digit dialing requirement is not the issue it once was, due in large part to the growth of wireless telephones and cordless handsets that are able to store frequently called numbers for customers. It is important that customers be aware that any medical, alarm, and security services equipment with a 317 area code number and programmed to dial only seven digits would need to be updated or reprogrammed to dial the area code + 7-digit telephone number for all calls within the 317 area code.

The industry and its customers have successfully undergone similar transitions in the past, e.g., when local dialing went from four to seven digits, and when numbers replaced names as prefixes. Experience to date across the country with overlays demonstrates that customers can readily adapt to an all-services distributed overlay and 10-digit dialing. Because of its superior cost-benefit characteristics, the all-services distributed overlay is the relief method of choice for both the telecommunications industry and customers.

Conclusion

The all-services distributed overlay best meets the goals of: (i) minimizing inconvenience to customers, (ii) minimizing costs to customers and the industry, and (iii) treating customers and carriers fairly and equitably. It allows all current customers to retain their numbers indefinitely, minimizes cellular and wireline telephone reprogramming, imposes minimal administrative burdens and costs on customers, can be implemented quickly, generally provides a longer period of relief from future change, and operates in a manner that is fair and equitable to all parties.

The Indiana Telecommunications Association urges the Commission to approve the all-services distributed overlay proposal for the 317 area code so that the industry may move forward with the NPA relief effort that we believe is in the best interests of Central Indiana consumers.