

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

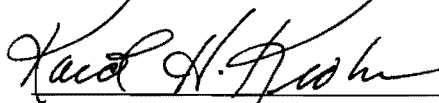
IN THE MATTER OF THE PETITION OF NEUSTAR,)
INC., ON BEHALF OF THE INDIANA) CAUSE NO. 44513
TELECOMMUNICATIONS INDUSTRY, FOR)
APPROVAL OF NPA RELIEF PLAN FOR THE 317 NPA)

OUCC TESTIMONY
OF
RONALD L. KEEN – PUBLIC EXHIBIT #1
ON BEHALF OF THE
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

JANUARY 06, 2015

Respectfully Submitted,

INDIANA OFFICE OF UTILITY CONSUMER



Karol H. Krohn, Atty. No. 5566-82
Deputy Consumer Counselor

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Office of Utility Consumer Counselor Testimony of Ronald L. Keen* has been served upon the following counsel of record in the captioned proceeding by electronic service and/or by depositing a copy of same in the United States mail, first class postage prepaid, on January 6, 2015.

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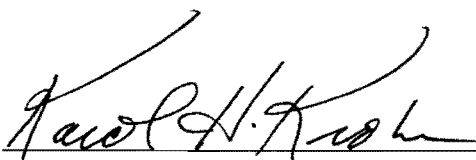
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STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

**IN THE MATTER OF THE PETITION OF)
NEUSTAR, INC., ON BEHALF OF THE)
INDIANA TELECOMMUNICATIONS) CAUSE NO. 44513
INDUSTRY, FOR APPROVAL OF NPA)
RELIEF PLAN FOR THE 317 NPA.)**

DIRECT TESTIMONY OF RONALD L. KEEN ON BEHALF OF THE
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

1 **Q: Please state your name and your business address.**

2 A: My name is Ronald L. Keen. My business address is 115 West Washington
3 Street, Suite 1500 South, Indianapolis, Indiana 46204.

4 Q: By whom and in what capacity are you employed?

5 A: I am employed by the Indiana Office of Utility Consumer Counselor (“OUCC”)
6 as a Senior Utility Analyst within the Resource Planning and Communications
7 Division.

8 **Q: Have you previously testified before this Commission?**

9 A: Yes, I have testified in a number of telecommunications and other dockets
10 before the Indiana Utility Regulatory Commission (“Commission”).

11 **Q: What, if any, prior experiences have you had with area code relief?**

12 A: I actively participated in Indiana's original 219 and 812 area code relief
13 proceedings¹. I testified on behalf of the OUCC in support of overlay relief for

¹ Cause Nos. 41535 and 44233, respectively.

1 the 812 area code². The 812 area code relief case is significant, since it involves
2 Indiana's first area code overlay relief.

3 **Q: What have you done to identify and investigate the issues presented in this**
4 **particular case?**

5 A: I reviewed the Petition and supporting testimony and exhibits filed by NeuStar,
6 Inc. ("Petitioner"), the current North American Numbering Plan Administrator.
7 OUCC staff participated in a number of teleconferences with NeuStar and
8 various representatives of Indiana's telecommunications industry, both before
9 and after NeuStar filed its Petition. The OUCC also participated in the five (5)
10 public field hearings³ and reviewed Public comments (see attached) to identify
11 any customer concerns and preferences between area code relief options.

12 **Q: Does the OUCC support Petitioner's proposal to overlay an additional code**
13 **to the existing 317 area code?**

14 A: Yes. Relief is needed for the 317 area code and the all-services, distributed
15 overlay cost-effectively addresses the need for additional numbering resources
16 while minimizing adverse impacts on affected communications service
17 providers and their customers.

18 **Q: Has the OUCC been able to gauge customer preference on the proposed**
19 **use of an all-services, fully-distributed overlay that would require ten (10)**
20 **digit dialing for all local calls originating in the 317 area code?**

21 A: Yes, to some extent. The OUCC participated in all recent Indiana field hearings
22 on area code relief, both in this case and in Cause No. 44233. Few customers

² Relief for the 812 area code was ordered by the Commission in 2013, with final implementation expected soon. An overlay of a specific area code requires mandatory ten (10) digit local dialing for all numbers within that overlaid geographic region.

³ The five hearings were conducted in Indianapolis, Carmel, Franklin, Danville and Greenfield, Indiana

1 have attended those public hearings or submitted comments for the
2 Commission's consideration. The low attendance at these hearings and the
3 small number of customers who submitted written comments to the OUCC (see
4 attached copies) indicate to the OUCC that consumers no longer view the
5 choice between different forms of area code relief as a significant issue.

6 **Q: Are you aware of any reasons why customers might prefer the use of an**
7 **area code overlay, instead of a geographic split?**

8 A: Yes. An overlay allows customers to keep their current telephone numbers,
9 including their current area codes. That convenience is extremely important to
10 businesses and other institutional customers since an area code overlay allows
11 them to avoid the inconvenience and expense of replacing current signage,
12 revising current advertisements, purchasing new business stationery, sending
13 change notices to customers, suppliers, business contacts and associates; or
14 revising listings in local, national and global directories.

15 **Q: What does the OUCC recommend regarding Petitioner's pending request?**

16 A: The OUCC recommends the Commission approve the proposed all-services,
17 fully-distributed area code overlay for the 317 area code.

18 **Q: Does this conclude your testimony?**

19 A: Yes.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.

A handwritten signature in black ink, appearing to read 'R. Keen', is written over a horizontal line.

By: Ronald L. Keen
Indiana Office of
Utility Consumer Counselor

January 6, 2015

Date:

CAUSE NO. 44513

PUBLIC COMMENTS

Swinger, Anthony

From: Wbillconn [wbillconn@aol.com]
Sent: Wednesday, November 12, 2014 8:18 AM
To: UCC Consumer Info
Subject: New area code for Central Indiana

To: Whom it may concernd,

I understand a need for a new area code for the 317 area. But why overlay the new area code over 317 area? Why can't Indianapolis get the new area code and the rest of the area keeps 317 or vice versa. I don't understand what is overlay a new area code over an existing one? How will I know what is local or a long call? I think it be more confusing to overlay than giving either Indianapolis or the rest of the 317 area a new area code. I don't want to go though the confusing or headaches like Southern Indiana is or will be with their new area code 930.

William Conn

December 3, 2014

IURC Cause No. 44513

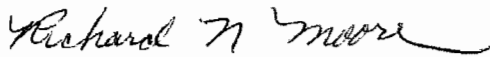
- I prefer retaining my current area code and phone number.
- New phone numbers can be assigned the new area code
- Everyone will dial a 10 digit number, regardless of distance.
- This would be far easier than informing businesses, friends, relatives and everyone else what my new area code would be. That is the same as moving and is difficult, especially for the elderly.

I regret missing the meeting in Greenfield. I did not see a notice of the meeting recently in the Greenfield Daily Reporter or in the Indianapolis Star.

Please inform through the media at what time and where the December 29 and February 10 meetings will be.

Thank you for the opportunity to offer opinions.

Richard N Moore



Contact information:

Richard N Moore

1307 Palm Ct

Greenfield, IN 46140

317-462-4147

r.n.moore63@gmail.com

02/10/2015

Swinger, Anthony

From: Lloyd [lloyd@hrtc.net]
Sent: Wednesday, December 03, 2014 10:22 PM
To: UCC Consumer Info
Subject: 317 area code

Hi There,

I just wanted to give some input on the new area code.

In my opinion, I think the media is making a bigger deal out of this than need be.

My family & I moved out here nine years ago from Los Angeles, Torrance to be exact.

When we left, Southern Calif. had nine different area codes.

You just get used to it.

On business cards, business sign, etc...you simply add the area code.

Something I have noticed about Indiana is that they are ten years behind the East & West coast. I am not knocking Indiana, just making an observation. For example, Microbrewery's were opening in LA. about 13 years ago.

Lloyd Eells

Swinger, Anthony

From: Web Form Poster [huderjoe17@gmail.com]
Sent: Wednesday, September 24, 2014 6:19 PM
To: UCC Consumer Info
Subject: Website Contact Form

Title: Mr.
First Name: Joseph
Last Name: Huber
Email: huderjoe17@gmail.com
Street Address: 3907 Santa Clara Dr
City: Greenwood
State: IN
Zip: 46142
Phone: (317)888-9989 ext.
Type: home
No Phone Service:
Case Number: 317 area code
Comments: use 10 digit phone numbers.

Swinger, Anthony

From: Web Form Poster [mary.duffy-lewis@sbcglobal.net]
Sent: Wednesday, September 24, 2014 10:43 PM
To: UCC Consumer Info
Subject: Website Contact Form

Title: Mrs.
First Name: Mary
Last Name: Duffy-Lewis
Email: mary.duffy-lewis@sbcglobal.net
Street Address: 2815 Halifax Dr
City: Indianapolis
State: IN
Zip: 46222
Phone: (317)313-5246 ext.
Type: work
No Phone Service:
Case Number: OUCC
Comments: I think more area codes should be added to central Indiana rather than require callers to dial the 317 area codes for all calls.

Swinger, Anthony

From: Web Form Poster [janhuber@aol.com]
Sent: Wednesday, September 24, 2014 8:43 PM
To: UCC Consumer Info
Subject: Website Contact Form

Title: Mrs.
First Name: Janice
Last Name: Huber
Email: janhuber@aol.com
Street Address: 3907 Santa Clara Dr
City: Greenwood
State: IN
Zip: 46142
Phone: (317)888-9989 ext.
Type: home
No Phone Service:
Case Number: 317 area code
Comments: 10 digit dialing