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April 19, 2001

Chairman Michael Powell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Re: File Nos. NSD-L-01-36 (Michigan)
CC Docket Nos. 96-98 and 99-200

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Powell:

As an executive and a citizen, I am writing to you to express my concern over the alarming rate at which Michigan area codes are exhausting available numbers and to support the Michigan Public Service Commission's Petition in this docket for authority to implement number conservation measures. In Michigan, since 1994 four area codes have been added with at least three more in need of relief. One of the codes (616) encompasses the area that I live in and do business. The Michigan Public Service Commission is currently considering an all services overlay for our 616 area as a means of relief

As you are aware, the addition of new area codes (whether through a geographic split or an overlay) is costly to businesses and their employees. The added confusion makes the overlay the least attractive option for area code relief. It is important to note that any area code solution will cost businesses needed capital to expand and create jobs.

A report to the Ad Hoc Telecommunications Users Committee stated that the available area codes, under a 10 number dialing plan, could be completely exhausted by 2007. If additional numbers are added to the dialing plan to create more available numbers, the cost to businesses nationally could reach \$150 billion. It is imperative that the FCC take action to reduce the rate of area code exhaustion and the necessity for 11 or 12 number dialing plans.

The same study also shows that the proper implementation of number conservation mechanisms could extend the life of the current 10 number dialing plans to at least the year 2048 and possibly as far into the future as 2097. In our current world, where knowledge doubles in 18 to 24 months, an additional 47 years may find the use of numbers for telecommunications obsolete.

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The Michigan Public Service Commission has filed a Petition in this docket asking that you grant it delegated authority for the Grand Rapids and Detroit Metropolitan Statistical Areas (MSA) so as to extend the life of existing and newly created area codes through 1,000 block number distribution and participation in the initial round of proposed national number pooling.

Under your criteria for such delegated authority you specify that the numbering plan area must be in jeopardy, have a remaining lifespan of at least one year and that the numbering plan area is in one of the largest MSA's. The Grand Rapids MSA currently meets your criterion for eligibility.

Therefore, the Federal Communications Commission should grant the Michigan Public Services Commission's Petition so that it may implement number conservation techniques that will save mine and other businesses millions of dollars in unnecessary costs.

Thank you for your consideration of this matter. If I can be of additional assistance to you or your staff, please do not hesitate to contact me directly.

Sincerely,



Michael F. Sabbe
Director of Firm Administration

Cc: Mr. Rusty Merchant
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