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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of	)	
	)	
Petition of the Public Service Commission of South Carolina for Delegation of Authority Pertaining to NXX Code Conservation Measures	)	NSD File No. L-01-87 CC Docket 96-98 CC Docket 99-200

COMMENTS OF TRITON PCS, INC.

Triton PCS, Inc. ("Triton"), by its attorneys, hereby submits these comments in response to the Petition of the Public Service Commission of South Carolina for Delegation of Authority Pertaining to NXX Code Conservation Measures (the "Petition").[1] For the reasons described below, the Commission should deny the Petition. Indeed, the Public Service Commission of South Carolina (the "PSCSC") has not met the basic requirements for delegation of numbering conservation authority under the Commission's well-settled policies.

I. Introduction

Triton is a regional wireless provider that serves more than 520,000 customers in the southeastern part of the country. Through a subsidiary, Triton is licensed to serve parts of the Charlotte, Knoxville, Atlanta, Washington and Richmond MTAs as a PCS provider and the Myrtle Beach RSA as a cellular operator and has service areas covering approximately 13 million potential customers in six states. As a rapidly-growing carrier, Triton must ensure that it has sufficient access to numbering resources to meet its customers' needs.

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[1] *See* "Common Carrier Bureau Seeks Comment on the Petition of the Public Service Commission of South Carolina for Delegation of Authority to Implement Number Conservation Measures," *Public Notice*, DA 01-1129, NSD File No. L-01-87, CC Docket 96-98, CC Docket 99-200, rel. May 3, 2001 (the "Notice").

Triton has a strong interest in this proceeding because it has significant operations in South Carolina. In South Carolina, Triton provides service in the Anderson, Charleston, Columbia, Florence, Greenville/Spartanburg, Greenwood, Myrtle Beach, Orangeburg and Sumter markets. Triton's service area in South Carolina includes both the 803 and 843 NPAs, which are the subjects of this proceeding. Triton also participated actively in the area code relief activities in the 803 and 843 NPAs and sent a representative to the relief planning meetings for both area codes. Triton thus has specific knowledge of the relief activities and the status of those NPAs.

The status of the 803 and 843 NPAs is significant to this proceeding. Both NPAs are projected to exhaust in the first quarter of 2003, nearly two years from now. Both NPAs have been the subject of relief planning activities that resulted in relief plans that are now before the PSCSC. In fact, these plans both have been pending at the PSCSC for three months. Further, neither NPA has been declared to be in jeopardy or is subject to rationing.[2] Indeed, both of the proposed relief plans can be implemented well before exhaust is likely to occur, assuming that the PSCSC acts on them.

In this context, there is no basis for granting the Petition. The Commission has adopted specific criteria for when a state may obtain number conservation authority and the Petition does not meet any of those requirements. Rather, it is evident that the Petition is nothing more than an attempt to avoid area code relief altogether, something the Commission specifically has determined that a state regulatory commission may not do.

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[2] Excerpts from the North American Numbering Plan Administrator's ("NANPA's") current area code relief report, showing the status of these NPAs as of May 24, 2001, are attached hereto as Exhibit 1. This report is available at http://nanpa.planet.net/reports/report.pdf. The NANPA Jeopardy Declaration Table also indicates that neither of these NPAs is in jeopardy. *See* http://www.nanpa.com/news/jeopardy_declaration_table.html (accessed May 30, 2001).

II. The Commission Should Deny the Petition

The Petition seeks authority for four specific forms of number conservation: number pooling, sequential number assignment, thousands block reclamation and post-relief rationing.[3] Each of these conservation measures can be granted only under certain circumstances. As shown below, however, the Petition does not demonstrate that any of the Commission's requirements have been met.

A. The Petition Does Not Meet the FCC's Requirements for Number Pooling

The Commission has established specific requirements for state regulatory commissions that wish to obtain authority to implement number pooling. In most cases, the Commission requires a state regulator to show that (1) the NPA is in jeopardy; (2) the remaining life of the NPA is at least one year; and (3) the NPA is in one of the largest 100 MSAs or most of the wireline carriers in the NPA are local number portability-capable.[4] Alternatively, a state regulator can show that sufficient "special circumstances" exist to justify the implementation of pooling.[5] The Petition meets neither of these sets of requirements.

First, the Petition does not meet the basic requirements for pooling authority because neither the 803 NPA nor the 843 NPA is in jeopardy. As described above, there has been no jeopardy declaration for either area code, and there is little prospect that either area code will be put into jeopardy. With nearly two years to exhaust and relief plans pending for both area codes before the PSCSC, the only possible way for jeopardy to occur would be for the PSCSC to fail to act on these plans.

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[3] Petition at 1, 5.

[4] *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, 7651-52 (2000) (*Numbering Resource Optimization First Report and Order*).

[5] *Id.*

Despite the NANPA's determination to the contrary, the Petition claims that both area codes are "in jeopardy."[6] This is incorrect. Rather, the specific recitals in the Petition – particularly that the codes will exhaust in the first quarter of 2003 "[i]f the PSCSC does not proceed with the implementation schedule proposed by the industry" – demonstrate that neither code is in jeopardy. Indeed, given that action by the PSCSC is the principal requirement to *avoid* jeopardy, it is evident that grant of the Petition is not warranted under the Commission's standard criteria for number pooling petitions.

Second, the Petition fails to demonstrate any "special circumstances" that would warrant granting pooling authority to the PSCSC. As the Commission has explained, to obtain pooling authority on grounds of special circumstances, a state commission must show that "pooling would be of benefit in NPAs that do not meet all of the [standard] criteria[.]"[7] The showings that have met this test have involved demonstrations that carriers in a state were using NXX codes at an extraordinarily rapid rate or that there would be some other state-specific benefit to telephone consumers.[8]

The Petition has not identified any special impacts on South Carolina consumers from area code relief or any special benefits that would accrue as a result of granting the Petition. In fact, the only justification in the entire Petition for delegation of numbering conservation authority is that the imposition of ten-digit dialing in the 803 and 843 NPAs would confuse customers who travel from those NPAs to the 864 NPA.[9] This cannot justify a grant of pooling

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[6] Petition at 3.

[7] *Number Resource Optimization First Report and Order*, 15 FCC Rcd at 7652.

[8] *See, e.g.*, Numbering Resource Optimization, *Order*, 15 FCC Rcd 23371, 23389-90 (2000) (the "*July Waiver Order*") (granting pooling authority to Oregon because projections showed use of nearly 700 NXX codes a year in that state).

[9] Petition at 4.

authority because it neither constitutes a special circumstance nor creates any real likelihood of confusion.

Initially, the Petition fails to explain why there is anything unusual about customers traveling from an area where ten-digit dialing is required to one where it is not. Millions of Americans do so every day, including many commuters in cities across the country.[10] Thus, there is nothing special about the situation that may occur in South Carolina that would justify grant of pooling authority when the basic criteria have not been met.

Moreover, there also is no real likelihood of confusion so long as permissive ten-digit dialing is in place. Many carriers, including Triton, already permit ten-digit dialing even when only seven digits are required.[11] Permissive ten-digit dialing will permit customers who accidentally dial ten digits instead of seven while traveling in the 864 area code to reach the people they are calling. It would be far simpler and less intrusive to for the PSCSC to implement permissive ten-digit dialing for those carriers that do not permit it in South Carolina than to adopt number pooling. Thus, there is no reason to believe that number pooling in the 803 and 843 NPAs is necessary to prevent confusion.

In sum, the Petition does not demonstrate that either the 803 NPA or the 843 NPA meets the requirements for number pooling. Rather, it appears that the sole purpose of the Petition is to seek authority to take steps to prevent area code relief from being implemented at all. As the Commission has held repeatedly, a state commission may not attempt to use number conservation mechanisms, including pooling and rationing, to prevent necessary area code relief

[10] For instance, people who live in Maryland or Virginia and who work in Washington, D.C. travel from ten-digit dialing areas to a seven-digit dialing area on a daily basis.

[11] This approach was recommended by NARUC in a 1994 resolution. *See* Exhibit 2.

from occurring.[12] In fact, where satisfactory relief plans are in place and there is no jeopardy, the Commission expects those relief plans to be implemented to ensure that all telecommunications customers can obtain the services and the numbering resources they desire. In this case, the only action that is required is for the PSCSC to act on the pending relief plans, and there is no reason to grant pooling authority. Consequently, the Petition should be denied.

B. There Is No Basis for Granting the PSCSC Special Authority to Require Sequential Number Assignment or to Reclaim Thousands Blocks.

Sequential number assignment and reclamation of thousands blocks are part of the normal process for implementing number pooling.[13] In the absence of number pooling, however, there is no need to implement either of these conservation measures and there is little potential benefit. Further, the Commission has adopted its own standards for thousands block reclamation and sequential number assignment that may not be superseded by a state commission. Thus, this aspect of the Petition should be denied.

Sequential number assignment and reclamation of thousands blocks do not, in and of themselves, conserve telephone numbers or NXX codes. Instead, these measures are intended to increase the utility of thousands block number pooling when it is implemented. Sequential number assignment increases the likelihood that a thousands block will be available for pooling, while reclamation merely reassigns unused (or lightly used) thousands blocks to the pool of available numbers. In a non-pooling environment, reclamation is not possible because there is no way to assign numbers in blocks of one thousand.

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[12] *See* Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, *Memorandum Opinion and Order and Order on Reconsideration*, 13 FCC Rcd 19009, 19027 (1998).

[13] *See Numbering Resource Optimization First Report and Order,* 15 FCC Rcd 7684-85.

When, as in this case, a state commission has not justified a request for number pooling authority, there is no reason to grant authority for thousands block reclamation. Indeed, because thousands block reclamation is not possible in a non-pooling environment, granting such authority prematurely would be meaningless and, potentially, actually could reduce the availability of numbering resources in the affected NPA. The Commission recognized this concern in the *Numbering Resource Optimization First Report and Order* by concluding that states may seek to reclaim thousands blocks only in connection with state pooling trials.[14]

Similarly, the Commission has adopted its own rules concerning sequential number assignment.[15] The Petition provides no reason to delegate additional authority to the PSCSC, either now or in the context of any future implementation of number pooling. Indeed, the Commission already has denied a series of requests for sequential number assignment authority from other state commissions on the basis of the existing rules, which had been in place for more than a year when the Petition was filed.[16] There is no reason for the Commission to act any differently in this case and, therefore, this aspect of the Petition should be denied.

C. The FCC Should Deny the Request to "Continue Rationing" Because There Is No Rationing in Either the 803 NPA or the 843 NPA Today.

In the introduction and conclusion of the Petition, the PSCSC seeks authority to "continue rationing measures after the implementation of" relief in the 803 and 843 NPAs.[17] The Commission should deny this request as entirely unjustified.

A state's rationing authority is a function of the necessity to ensure that numbering resources will not exhaust before area code relief can be implemented. For that reason, and as

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[14] *Numbering Optimization First Report and Order,* 15 FCC Rcd at 7681.

[15] *See id.* at 7683-85; 47 C.F.R. § 52.15(j).

[16] *See, e.g.,* Numbering Resource Optimization, *Order*, CC Docket No. 99-200, CC Docket No. 96-98, NSD File No. L-00-170, NSD File No. L-00-171, NSD File No. L-00-169, NSD File No. L-00-95, ¶ 4 (rel. Feb. 14, 2001).

A state's rationing authority is a function of the necessity to ensure that numbering resources will not exhaust before area code relief can be implemented. For that reason, and as the Commission has recognized, rationing can be a valuable tool when an NPA is in jeopardy. On occasion, the Commission also has acknowledged that post-relief rationing may be appropriate to prevent a "land rush" following implementation of relief.[18] Even in those cases, however, the Commission permits state commissions only to continue the pre-existing rationing plan without modification.[19] The Commission has not permitted changes to existing plans, let alone implementation of a new rationing plan where none previously existed.

When those principles are applied to the 803 and 843 NPAs, it is evident that the request for rationing authority in the Petition must be denied. As described above, there is no rationing in either area code today, and there will not be any rationing unless the PSCSC fails to act in a timely fashion on the relief plans that have been pending before it for three months. In the absence of pre-relief rationing, there is no basis for post-relief rationing, in large part because there is no real likelihood of a surge in NXX code requests when relief is implemented. If anything, carriers are likely to delay requests for new NXX codes so that they can squeeze even more use out of the familiar numbers in the original area code.

Moreover, permitting post-relief rationing would be inconsistent with the Commission's actions in other cases because it would allow the PSCSC to impose additional requirements that did not exist before relief. The Commission's decisions specifically prohibit any changes between pre-relief and post-relief NXX assignments and the PSCSC has provided no support

[18] *See July Waiver Order*, 15 FCC Rcd at 23398-99.

[19] *Id.*

whatsoever for its request to deviate from that standard.[20] Consequently, the Petition's rationing request should be denied.

III. Conclusion

For all these reasons, the Commission should deny the Petition of the Public Service Commission of South Carolina for Delegation of Authority Pertaining to NXX Code Conservation Measures in its entirety.

Respectfully submitted,

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By: _____
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[20] Even if the PSCSC had provided some support for its request, the Commission also has limited post-relief rationing to six months, and the Petition appears to seek authority to ration NXX codes for an unlimited time. *Compare id. with* Petition at 1, 5.

EXHIBIT 1

NANPA Area Code Relief Report

STATUS OF ACTIVE AND PENDING NPA RELIEF PROJECTS

NPA	787	801	803	804	805	810	815
Location	PR	UT	SC	VA	CA	MI	IL
Exhaust	3Q2001	1Q2001	2Q2003	2Q2002	4Q2003	2Q2001	2Q2002
Relief Status	Active	Active	Active	Active	Active	Active	Active
Industry Notice	1/13/00	8/12/99	10/12/00	3/23/99	6/30/99	3/17/99	3/22/00
IPD Distribution	1/18/00	8/26/99	10/30/00	4/6/99	7/14/99	4/20/99	4/5/00
Relief Meeting(s)	2/25/00	9/23/99	11/30/00	5/4/99	8/11/99	5/18/99	5/3/00
					2/2/00		
					5/10/00		
Technical Meeting(s)		2/22/01					
Local Jurisdiction Mtg				-	2/2/00		
Public Meeting(s)		3/14/00 3/15/00		3/6/00 3/9/00	3/8/00 (2)	11/9/00	
		3/16/00		3/27/00	3/9/00	11/20/00	
		3/22/00					
Relief filed w/PSC	3/29/00	11/4/99	2/23/01	6/9/99	7/17/00	NA	6/29/00
Approval Requested By			6/1/01				
PSC Approval Received	5/19/00	4/26/00		12/7/00		12/11/00	
Type of Approved Relief	Overlay	Split		Split/Over.		Split	
Start of Permissive Dialing	2/12/01	3/30/02		S=6/1/01 O=TBD		9/22/01	
Mandatory Dialing	7/15/01	9/30/02		S=1/15/02 O=TBD		3/23/02	
End of Recorded Announc.						4/22/02	
NPA Assignment Request	5/19/00	4/27/00		12/7/00		NA	
New code(s) assigned	939	385		434		586	
Implementation Meeting	6/22/00	5/18/00		1/4/01		1/24/01	
PL Published	7/27/00 PL-NANP-236 1/26/01 PL-NANP-259	5/31/00 PL-NANP-231 11/6/00 PL-NANP-248		1/22/01 PL-NANP-257		3/1/01 PL-NANP-265 4/30/01 PL-NANP-273	
Jeopardy Declar.-PL#	11/17/99	9/22/99		5/10/99	8/19/99	4/2/99-178	7/25/00
Jeopardy Meeting(s)	1/11/00	10/18/99		6/7/99	8/31/99	4/21/99	8/17/00
		10/26/99		8/3/99		5/18/99	
		4/18/00				7/12/00	
		11/1/00					
		11/29/00					
		3/12/01					
In Rationing (Y/N)	Y	Y	N	Y	Y	Y	Y
Monthly Rationing	8	6		6	5	3	5
Notes		801-1 801-2	803-1		805-1		815-1

Updated 5/24/01
Previous Update 5/10/01

STATUS OF ACTIVE AND PENDING NPA RELIEF PROJECTS

NPA	816	818	832/713/281	843	847	856	860
Local	MO	CA	TX	SC	IL	NJ	CT
Exhaust	1Q2002	4Q2003	3Q2002	2Q2003	4Q2000	3Q2002	1Q2002
Relief Status	Active	Active	Active	Active	Active	Active	Active
Industry Notice	9/28/99	6/1/98	12/15/99	10/3/00	Jan-97	5/18/00	NA
IPD Distribution	10/12/99	6/1/98	12/29/99	10/10/00	Jan-97	6/1/00	NA
Relief Meeting(s)	11/9/00	6/10/98	1/26/00	11/14/00	1/97-11/98	6/29/00	NA
		7/21/98					
		8/24/99					
		10/1/98					
		12/9/98					
Technical Meeting(s)							
Local Mediator Mtg		10/1/98					-
Public Meeting(s)	4/24/00(3)	11/4/98			Apr-98		NA
	5/3/00(3)	11/5/98					
Relief Filed W/PSC	12/17/99	2/12/99	3/7/00	2/23/01	5/5/97	8/10/00	NA
Approval Requested By	3/1/00			6/1/01			NA
PSC Approval Received	10/24/00	10/7/99			5/11/98		9/29/99
Type of Approved Relief	Overlay	Split			Overlay		Overlay
Start of Permissive Dialing	5/5/02	TBD			5/11/98		TBD
Mandatory Dialing	9/8/02	TBD			TBD		TBD
End of Recorded Announc							
NPA Assignment Request	10/31/00	10/18/99			May-98		10/4/99
New code(s) assigned	975	747			224		959
Implementation Meeting	11/30/00				1/11/01		11/19/99
PL Published	2/20/01 PL-NANP-262 5/11/01 PL-NANP-280				6/30/98 PL-NANP-127		2/25/00 PL-NANP-217 1/3/01 PL-NANP-255
Jeopardy Declared PL		5/21/98-130			NA		4/21/98-138
Jeopardy Meeting(s)		6/10/98			10/14/98		5/15/98
					5/7/98		6/16/98
					7/22/98		7/7/98
							11/5/98
							9/19/00
							1/8/01
In Rationing (Y/N)	N	Y	N	N	N	N	Y
Monthly Rationing		3					7
Notes		818-1	832-1	843-1	847-1	856-1	860-1 860-2 860-3

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Previous Update 5/10/01

Notes

801-1	Commission ordered mandatory dialing to begin when all 801 codes have been assigned.
801-2	Number pooling started on 4/2/01
803-1	Industry recommended an overlay. Informal filing will be made to the SC PSC after a presentation on 2/20/01
805-1	Industry reached consensus to recommend two alternatives to the CPUC, a split and an overlay.
815-1	The industry reached consensus to recommend an overlay.
818-1	CPUC ordered a geographic split and number conservation. Implementation of the split has not been determined.
832-1	Industry recommended an overlay.
843-1	Industry recommended an overlay. Informal filing will be made to the SC PSC after a presentation on 2/20/01
847-1	Investigative docket is open. Implementation of new NPA is dependent on the assignment of the first NXX.
856-1	Industry recommended for relief an overlay.
860-1	Consensus reached to ration seven codes/month from a single pool of codes.
860-2	The industry agreed to the add to the jeopardy procedures thousands block administration procedures.
860-3	Thousands block pooling began 10/6/00.
863-1	The 863 NPA split off from the 941 NPA and will remain in jeopardy until 66 days before mandatory dialing on 5/22/00.
903-1	Industry reached consensus to recommend an overlay.
904-1	Number pooling started on 4/2/01
904-2	Rationing scheduled to end on 11/5/01
909-1	On 12/16/99, CPUC suspended the overlay portion of the relief project and temporarily suspended the split portion.
909-2	Thousands block pooling started on 12/8/00
916-1	Thousand block number pooling begins 7/28/01
918-1	Industry recommended an overlay at the 9/12/00 meeting.
920-1	Industry recommended an overlay and the relief plan will be filed when 180 codes are available or 6 mos.
925-1	Industry recommended 2 plans: an overlay and a 2-way split.
925-2	Thousand block number pooling begins 9/29/01
941-1	Industry recommended an overlay, and Alt #4 georgraphic split as second choice.
949-1	Industry reached consensus to submit 3 alternatives to the CPUC, an overlay and 2 splits, without a recommendation.
954-1	Number pooling starts 1/22/01

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Previous Update 5/10/01

EXHIBIT 2

NARUC Permissive Dialing Resolution

Resolution Concerning a Minimum Standard Dialing Plan

WHEREAS, The Bell Communications Research Corporation (Bellcore) was created as a result of the Modified Final Judgment between AT&T and the United States Department of Justice; and

WHEREAS, The Plan of Reorganization stipulated that Bellcore should be the administrator of the North American Numbering Plan for the telephone industry; and

WHEREAS, Due to the rapid exhaust of the supply of Number Plan Area (NPA) codes, Bellcore is planning to implement on January 1, 1995, an interchangeable Number Plan Area (INPA) code format, i.e., allowing the use of any number between 0 and 9 as the middle digit of an area code; and

WHEREAS, When interchangeable NPAs are introduced, switching systems will not be able to distinguish between 7- and 10-digit addresses by examining the first three digits of the telephone number dialed; and

WHEREAS, The Bellcore recommended dialing plan under INPA for those locations without Step-by-Step equipment is that all calls within the Home Numbering Plan Area (HNPA), whether local or toll, be dialed on a 7-digit basis, and some states are considering a HNPA 11-digit toll call dialing requirement; and

WHEREAS, On May 26, 1993, the Ad Hoc Telecommunications Users Committee (Ad Hoc) filed a request for a rulemaking to adopt an alternative dialing plan to the Bellcore proposal to eliminate the use of the prefix '1' as a toll call identifier as part of its implementation of INPA; and

WHEREAS, The Ad Hoc recommended dialing plan shown below:

Local call, Home NPA	7-digits	NXX-XXX
Local call, Foreign NPA	10-digits	FNPA-NXX-XXXX
Toll call, Home NPA	11-digits	1+HNPA-NXX-XXXX
Toll call, Foreign NPA	11-digits	1+FNPA-NXX-XXXX

retains the prefix '1' as a toll call identifier, which gives the consumer a clear indication when a call will be billed as a toll call; and

WHEREAS, States have historically been involved in the implementation of local dialing plans; and

WHEREAS, A uniform nationwide dialing plan will assist states in dealing with the shortage of available numbering resources and the impending implementation of INPA codes; and

WHEREAS, Uniformity of dialing plans across jurisdictions is desirable given the increasing mobile nature of our society; and

WHEREAS, On July 27, 1993, the National Association of Regulatory Utility Commissioners (NARUC) Committee on Communications adopted a Communications Subcommittee proposal to establish a work group of interested staff to review existing and proposed dialing plans to determine their workability and to develop a draft position on the feasibility of adopting a uniform nationwide dialing plan; and

WHEREAS, The work group has developed a draft position supporting adoption of a minimum standard dialing plan of Prefix '1' + Area Code + Central Office Code that should be established on a permissive basis in each state as an 'overlay' to existing dialing plans; and

WHEREAS, The draft position recommends that the local exchange company should route the call to an explanatory announcement about the applicable dialing procedures for a particular location, if the minimum standard dialing plan cannot be used in that location; now, therefore be it

RESOLVED, That the Executive Committee of the NARUC, convened at its 1994 Winter Meeting in Washington, DC, endorses the minimum standard dialing plan of Prefix '1' + Area Code + Central Office Code on a permissive basis, as any overlay to existing state dialing plans; and be it further

RESOLVED, That, if the minimum standard dialing plan is not workable in a particular location, the local exchange company should route the call to an explanatory announcement about the applicable dialing procedures for that location; and be it further

RESOLVED, That all NARUC members are encouraged to adopt Prefix '1' + Area Code + Central Office Code as the minimum standard dialing plan within their state jurisdictions; and be it further

RESOLVED, That, in addition to the minimum standard dialing plan, all NARUC members are strongly urged to adopt a dialing plan, such as using the Prefix '1' as a toll indicator, within their state jurisdictions that gives the consumer the information to easily determine when a call will be billed as a toll call; and be it further

RESOLVED, That the NARUC General Counsel shall file papers and other documents supporting the policies of this resolution in the appropriate forms to further this recommendation.

Sponsored by the Committee on Communications
Adopted March 1994

CERTIFICATE OF SERVICE

I, Vicki Lynne Lyttle, a legal secretary at Dow, Lohnes & Albertson, PLLC do hereby certify that on this 1st day of June, 2001, copies of the foregoing "Comments of Triton PCS, Inc." were served via first-class mail, postage prepaid, on the following:

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