

CC Docket 99-200

**From:** Jim [mailto:JOKERS.WILD@rocketmail.com]  
**Sent:** Friday, June 19, 2009 1:32 PM  
**To:** Carolyn Conyers  
**Subject:** Fw: 10 Digit Dialing Within One's Area Code

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**From:** Jim <JOKERS.WILD@rocketmail.com>  
**To:** Michael.Coppes@fcc.gov; Jonathan.Adelstein@fcc.gov; Robert.McDowell@fcc.gov;  
scott.marshall@fcc.gov  
**Sent:** Monday, April 27, 2009 10:37:01 AM  
**Subject:** 10 Digit Dialing Within One's Area Code

4/27/09

Jim McLean  
[Jokers.Wild@Rocketmail.Com](mailto:Jokers.Wild@Rocketmail.Com)  
(818) 317-8784  
12227 Osborne Place #243  
Pacoima, CA 91331

At Issue:

10 digit dialing in ones area code

My Proposal:

Allow a period of time for receiving an existing area code number before an overlay.

Once the overlay is in effect, no more of the existing area code number will be allowed to be issued, except for special cases to be defined, causing all new numbers issued to be in the new area code. An exception might be for someone already with one phone number in the existing area code, government needs and such.

Once the new area code has reached 10% (a suggestion) of the numbers issued in the overlay area or two to three years (another suggestion), whichever is first, the restriction on issuing numbers using the old area code are lifted. There needs to be a formula and/or time period for releasing the ban on existing area code phone numbers being issued.

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List A B C D E

What is the current rule?

47 C.F.R. § 52.19(c)(3)(ii). This rule provides: "No area code overlay may be implemented unless there exists, at the time of implementation, mandatory ten-digit dialing for every telephone call within and between all area codes in the geographic area covered by the overlay area code."

Why is the current rule?

When I called the Pacific Utilities Commission Hotline, I got the following answer:

"You must do the ten digit dialing or your call won't go through. "

I received the same answer from two different people at the CPUC. I don't like bully rules, so I dug farther.

From the California Public Utilities Commission Website:

13. Why do I have to dial 1 + the area code and then the telephone number?

The Federal Communications Commission (FCC) requires dialing the area code + telephone number for all calls where an area code overlay exists. The FCC believes that this would maximize numbering resource optimization, minimize anti-competitive effects due to dialing disparities, and avoid customer confusion.

Dialing the "1" before the telephone number signals to the telephone company routing system that your call will be going outside the area code rather than to a prefix within your area code. Use of the additional "1" allows your call to be transmitted in the most expeditious way possible.

This is not an acceptable answer either. It doesn't say why.

Confusion:

How does your plan avoid customer confusion? The explanation by the CPUC uses big words combined in a way that the majority of customers have no idea what is being said with the explanation. They are still confused after reading the explanation given, and I am confused why you don't already see that. If you dared to tell the customers the truth, they would become very upset with your rule. You need them to be confused.

The guts of all this:

You are attempting to protect the new telecommunications company that may or may not start up in an area with an overlay. As the existing area code numbers have been pretty much assigned out to the existing telecommunications companies, the new company would have a difficult time recruiting new customers, as they would only be able to use the new area code numbers, so customers would request the existing area code numbers, as they would have more numbers where they would only have to dial seven numbers. Thus you have chosen to penalize all those in the current area code by making them dial the ten digits as well as penalizing the ones in the new area code by

making them dial the ten digits also. I would like to see the empirical studies you have done showing that your assumptions are correct. Without studies, your plan makes an assumption at best. Even if it does work, it pales in comparison to the proposed plan.

**No Big Deal:**

To you this is no big deal. Either you do not live in an area with an overlay, or you have gotten used to it. Besides, it is your job. You might say it only takes a couple of extra seconds. There are tens of millions out there that are irritated each time they have to dial the ten digits for a phone call within their own area code, when multiplied by a couple of seconds each adds up to a significant number. I don't think you really want to challenge me to prove it.

**Motivation:**

It "ain't" right. I want to dial seven digits every time I call within my own area code. I am not looking for publicity or money.

**Bottom Bottom Line:**

Please change the rule to the proposed plan, or another plan that does not require the ten digit dialing within one's area code, not just my area code, but all the others you have done this to. This plan guarantees the results you are looking for. It does not assume results like your plan. This plan removes the penalty you have forced with overlays. It is an easy sell. People understand their area code may be running out of numbers. They do not understand why they have to dial ten digits within their own area code. They will not be happy if they find out the truth.

This is only plan "A". Please be assured there are multiple plans available if needed.