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Date:	4/17/2007 11:50 AM
Subject:	Yes to overlay! (RE: Docket No. 07-999-01)

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The choice is obvious to me. As someone who worked in the Information Technology industry in the 801/435 split period, I know the chaos a split can cause. I also realize that no change is "easy" and you can not make everyone happy with whatever decision you choose.

I favor a Overlay over a split and I think it makes more logical sense can that split as well. First, let's compare the PROs and CONs of Split verses Overlay:

Area Code Splits

Overlays

CON: Splits provide a single area code for each geographic area.

PRO: With an overlay there will be more than one area code in a geographic area.

CON: Splits require an area code change for approximately one-half of the consumers in a two-way split. Consumers may have a different area code for their residence telephone numbers compared to their cell phone or business telephone numbers. This depends on the rate center associated with the prefix or exchange of the telephone number.

PRO: An overlay will not require consumers with existing telephone numbers to change their area code. Consumers that want new telephone numbers may have to accept telephone numbers with the new area code. Some consumers might be assigned a different area code for new telephone numbers within the same residence or business where multiple telephone numbers already exist.

PRO: Splits permit 7-digit dialing within an area code.

CON: An overlay requires consumers to dial 10 digits, i.e. area code + seven digit number.

CON: Consumers receiving the new area code will need to change stationery, business cards, advertising, etc. They will also need to notify people of the new area code, if needed. Manual or over-the-air reprogramming of cell phones may be needed.

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PRO: There is no need to revise stationery, business cards, and advertising for business owners with existing telephone numbers. Consumers, especially security alarm companies, apartment complexes, and gated communities, will need to ensure their telecommunications equipment will be able to handle 11 digit dialing.

CON: Future splits will reduce the geographic size of the area code.

PRO: Overlays will likely end further shrinking of the geographic size of the area code because subsequent relief will probably be another overlay.

PRO You can still dial just three digits to reach 911 and 411.

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??? No info on this one yet.

PRO (Not counted in the total)

What is a local call now will remain a local call regardless of the number of digits dialed. The price of a call, coverage area, or other rates and services will not change due to the overlay.

Total: 4 CON - 2 PRO

Total: 5 PRO – 1 CON

The total is 5/2 for a Overlay compared to a split. This isn't conclusive for a decision but does provide a quick overview of why a Overlay would be a better choice.

Next, let's look to see what I found about other regions that are, or were, considering an Overlay to a Split:

Bob Mayerfeld, who owns five Table Talk stores - three in Tucson and two in Phoenix - went through an area code change when the Phoenix area code was split up.

Based on his earlier experience, he predicts few if any problems when the 520 change occurs.

He said businesses will begin putting a 10-digit number in their ads, and customers will quickly adjust.

"It's amazing how easily they learn to remember the 10-digit numbers," Mayerfeld said. "We all adjust, even though it will probably annoy some people in the beginning."

http://www.areacode-info.com/headline/2000/az001026.htm

From the same article:

ACC spokeswoman Murphy... said both area code options pose challenges for businesses.

With a geographic split, those subject to a new area code face the expense of reprinting materials like business cards, stationery and brochures, she said.

And with an overlay, some communications equipment would require reprogramming, and possibly new software, to handle the new 10-digit system, she said.

From Iowa article talking about splitting up the 319 area code, this is a reference to the previous split of the Iowa 515 area code:

The IUB already has chosen to split the 515 area code to relieve the telephone number shortage in the middle third of Iowa.

Residents of the 515 area code spoke against an overlay because it would require 10-digit dialing on local calls.

After a split was ordered by the IUB, however, many residents said they wished they had been more aware of the possible implications.

From "BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA" concerning the 310 Area code Overlay vs. Split in California:

[Sec 3-C] At the four other public meetings, the message was mixed, depending on in which portion of the 310 area code the audience members lived, and whether they would get to keep the 310 area code or be assigned the new 424 area code in the event of a geographic split. Most speakers did not want the Commission to take any action to add a new area code. The people living in the area who would keep the 310 area code in a geographic split appeared to favor the split plan. People living in the area who would get the new area code under a split tended to favor the overlay plan more. Many of the business people liked the overlay proposal better than the split. Those who represented the senior and disabled communities favored the split plan.

[Sec 5 Findings of Fact]

3- Based upon reevaluation of the merits of the split versus overlay options, taking into consideration more recent experience with overlays in other states, it is found that an overlay would result in fewer overall adverse impacts when compared with a geographic split of the 310 area code. 10- Although there is no area code change for existing numbers with an overlay, customers still need a transitional period to become familiar with mandatory 1+10-digit dialing and the notion of two area codes within a single geographic area.

20. The overlay avoids the need for existing customers to change their telephone number area code for existing lines.

21. A geographic split creates economic hardships particularly on affected businesses which must notify customers of area code changes, and change business cards, letterheads, advertisements, etc.

22. With an overlay, geographic boundaries no longer define a single NPA, thereby eliminating the advantage of having geographically-defined NPA boundaries as a means of identifying and unifying communities of interest.

24. While both the overlay and geographic split have certain adverse impacts, the overlay will have less overall adverse impacts than either of the geographic split alternatives proposed for the 310 NPA.

http://www.cpuc.ca.gov/PUBLISHED/FINAL_DECISION/48991-02.htm#P97_8880