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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF PETITION FOR  
(801) AREA CODE OVERLAY &  
ABROGATION AND RECISION OF 801  
AREA CODE SPLIT ORDER

**DOCKET NO. 07-999-**

**REQUEST FOR AGENCY ACTION**

Petitioners AT&T,<sup>1</sup> Sprint Nextel Corporation, T-Mobile West Corporation d/b/a T-Mobile, Qwest Corporation, Verizon Wireless and MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services (collectively, “**Carriers**”), by and through their undersigned counsel, hereby jointly submit this Request for Agency Action to request that

<sup>1</sup> For the purpose of this request, “AT&T” collectively refers to AT&T Communications of the Mountain States, TCG Utah, and AT&T Mobility.

the Utah Public Service Commission (“**Commission**”) (1) abrogate, repeal and rescind its April 26, 2000, Split Order<sup>2</sup> (“**Split Order**”), which established an area code split as the method of telephone number relief for the 801 NPA; and (2) enter a new order implementing an overlay of the new 385 area code over the existing 801 NPA.

**I. SUMMARY**

The Carriers are wireless telecommunications and local exchange carriers that provide service to thousands of customers along the Wasatch Front. These customers will be far less impacted by an NPA overlay than if the existing area code split is implemented. In the Split Order, the Commission retained the 801 NPA designation in Salt Lake County and assigned a new NPA (385) to the remaining areas of the current 801 NPA. That plan will require customers in Weber, Morgan, Davis, and Utah Counties to change their telephone numbers. Implementing the Split Order will cause great inconvenience and many difficulties for those impacted consumers and the telecommunications industry. To avoid these problems, the Commission should implement an all-services overlay in the 801 NPA. As explained below, an overlay has many benefits and avoids many of the difficulties that would occur if a split were implemented.

**II. AUTHORITY AND JURISDICTION**

This request for agency action is being filed pursuant to Utah Code Ann. § 63-46b-3 and Utah Admin. Code R746-100-3, which provides that “[a]pplications, petitions, complaints, orders to show cause, and other traditional initiatory pleadings may be filed with the commission. Traditional pleadings will be considered requests for agency action, pursuant to Section 63-46b-3, concerning adjudicative proceedings.”

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<sup>2</sup> See *In the Matter of Telephone Number Conservation Measures for (801) Area Code Relief and In the Matter of the Request of the North American Numbering Plan Administrator For a New Area Code within the (801) Area Code*.

**III. REQUEST FOR RELIEF**

The Carriers urge the Commission to abrogate and rescind its Split Order and enter a new order implementing an overlay of the new 385 area code in the area that is currently assigned the existing 801 NPA. The Carriers also request expedited consideration of this Request and establishment of an expedited schedule that includes the convening of a technical conference and public hearing at the earliest convenient time.

**IV. STATEMENT OF REASONS SUPPORTING RELIEF**

**THE COMMISSION SHOULD ABROGATE AND RESCIND ITS SPLIT ORDER AND ENTER NEW ORDER FOR 385 AREA CODE OVERLAY OF 801 NPA**

Under Utah Code Ann. § 54-7-10(2) and § 54-7-13(1), the Commission has the power and authority to abrogate or repeal and to “rescind . . .any order or decision made by it.” An order “rescinding . . . a prior order or decision shall have the same effect as the original order or decision.” *Id.* § 54-7-13(1). The Split Order continues “in force . . . until abrogated by the commission,” *id.* § 54-7-10(2); therefore, the Carriers respectfully request that the Commission expeditiously rescind its Split Order

In this Request, the Carriers seek abrogation and rescission of the Split Order that mandated an area code split and issuance of a new order that provides for an overlay of a new area code over the existing 801 area code. There are three primary reasons why the Commission should take these actions. As explained more fully below: (a) an overlay offers consumers many advantages over an area code split; (b) the telecommunications industry already has developed a successful plan for educating consumers about an overlay; and (c) changed circumstances since the Commission’s 2000 Split Order justify implementing an overlay rather than a split.

**A. OVERLAYS OFFER MANY ADVANTAGES OVER AREA CODE SPLIT**

The ever increasing demand for telephone numbers necessitates adding a new area code in the Wasatch Front calling area. In implementing this new area code, the Commission should

choose the method of implementation that includes the most advantages and fewest disadvantages for consumers. The Carriers strongly believe that an overlay of a new area code over the existing 801 area code NPA will offer consumers far more advantages than the area code split that is mandated by the Split Order.

**i. An overlay will not require consumers to change phone numbers**

Perhaps the greatest advantage of an overlay over a split is that implementing an overlay will not require *any* consumers or businesses to change their telephone numbers. Eliminating the need for consumers to change their telephone numbers has many important advantages, including the following:

- No consumers will be forced to change or “give back” their telephone number.
- No businesses will be required to endure the unnecessary cost and inconvenience of changing stationery, business cards, signage, yellow page advertising and other advertising, websites, brochures, catalogs, etc..
- Overlays circumvent the risk to small businesses, independent contractors and agents (i.e., real estate agents, construction or household maintenance contractors, tax consultants, brokers etc.) that may not have regular contact with their clients, who may conduct business on an ad-hoc or seasonal basis, or who may rely heavily on referrals for ongoing work. An overlay would not put individuals in such occupations at undue financial risk where the loss of their phone number could force them out of business.
- For residential customers, adopting an overlay instead of a split will obviate the need for customers to contact friends and distribute updated phone numbers to virtually everyone they know.
- Overlays treat all consumers equally; there is no “wrong side” of an overlay, whereas an area code split necessarily provides “preferential” treatment to some users who are allowed to retain their existing numbers, and “discriminates” against others who are forced to change their phone numbers.
- The boundaries between the existing 801 and new 385 area codes contemplated by the current plan do not correspond to the current local calling areas for wireline service. An overlay is preferable and will result in less customer confusion because there will only be two dialing patterns in the current 801 NPA (10 digit for local service and 1+10 digit for toll service), instead of three (7 digit and 10

digit for local service and 1+10 digit for toll service) if the Split Order is implemented. This problem is most evident between Salt Lake and Davis counties.

- Once an overlay is implemented, if future demand warrants additional area code relief, it will be very easy to implement an additional all-services overlay in the same geographic area. Further geographic splits, in contrast, would become increasingly complex and controversial.
- Generally, carriers are able to make the necessary changes in their networks to implement an overlay more quickly than for a split.
- There is no “flash cut” with an overlay. Rather, new numbering resources are assigned as they are needed. This does not force current customers on the “wrong side” of the split to change their numbers.
- Overlays provide a more efficient means of allocating numbering resources throughout the affected area by allowing telephone numbers to be available for use across the entire footprint of the original NPA. In this way, numbering allocation mirrors demand without the need to “predict” where future resources are needed, unlike with geographic splits.<sup>3</sup> In the current 801 split plan, the Commission has drawn lines closely corresponding to county boundaries, which may or not coincide with growth patterns over time. An overlay would avoid such a dilemma.
- With an overlay, it is unnecessary to manually reprogram wireless devices for customers who have no “over the air” reprogramming capability.
- Even with “over the air” reprogramming, if a wireless customer is an infrequent user or out of the country, he or she may miss the reprogramming transmissions. That could result in service interruption and/or a trip to the wireless service provider’s retail store to correct the problem.

As this list demonstrates, there are many advantages to establishing an all-services overlay instead of implementing a geographic split.<sup>4</sup> In fact, overlays are now the most popular form of

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<sup>3</sup> Split boundary lines are usually recommended by NeuStar (as the NANPA) based on its analysis of likely future demand patterns -- to ensure that the split areas are relatively balanced and have similar life expectancies after the split. Such predictive analyses, which may not match actual market conditions in the future, are not necessary with an overlay.

<sup>4</sup> The FCC has considered the relative advantages and disadvantages of geographic splits and overlays. See *Numbering Resource Optimization, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200*, 16 FCC Rcd. 306, ¶¶ 62-70 (2000). Among the disadvantages of geographic splits relative to overlays that the FCC has

numbering relief to be ordered by state commissions across the country today. Seventeen (17) states, the Territory of Puerto Rico, Canada and the Dominican Republic have ordered a combined total of more than 70 overlays<sup>5</sup> in recent years.<sup>6</sup> The Commission should join these states in their “progressive” approach to numbering policy by recognizing that the divisiveness inherent in a split can and should be avoided.

When it ordered the split seven years ago, the Commission stated that it “considered many points of view and different objectives in reaching a decision, [but] was primarily concerned with minimizing the impact on the general populace.”<sup>7</sup> At the time, the Commission assumed that, if an overlay were adopted, a dialing pattern change would impact all consumers as opposed to affecting only one-half of the subscriber base if a split were adopted.<sup>8</sup> Over time, however, customer acceptance and public perception of ten-digit dialing have changed – a fact recognized by many state commissions – and so the requirement to dial ten digits no longer poses a significant concern for consumers. An area code split has a far greater impact, however, because it “guarantees” that one-half of all residents and businesses will suffer negative repercussions of relief planning when they are forced to change their phone numbers.

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identified are these: (1) approximately one-half of the subscribers in the original NPA must bear substantial costs associated with changing to a new NPA; (2) the difficulty of accurately forecasting growth versus non-growth areas, thereby increasing the likelihood of premature exhaust; and (3) splits can often create dialing confusion by requiring customers to use one dialing pattern for some local calls (seven digits) and another dialing pattern for others (ten digits).

<sup>5</sup> This number includes planned area code overlays that have been adopted by the state or other jurisdiction but have not yet been put into service due to conservation measures.

<sup>6</sup> Puerto Rico and the following states have implemented an all-services overlay: California, Colorado, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Mississippi, North Carolina, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas and Virginia. Ten states have more than one overlay. See [www.nanpa.com](http://www.nanpa.com). In addition, Canada (5 overlays) and the Dominican Republic (1 overlay) have each implemented overlays. See *id.* In all, 53 overlays have been implemented in North America. See *id.*

<sup>7</sup> Order at 3.

<sup>8</sup> Split Order at 3-5.

Several overlays have been implemented without incident in numerous states since 2000 when the Commission decided to split the 801 area code.<sup>9</sup> In fact, it is the Carriers' experience that an overlay is less disruptive than a split because **no** consumers are forced to change their telephone numbers. Conversely, during a split many consumers are adversely impacted by the disruption of having to change their telephone number merely because they live in the area that is selected to lose the prior NPA designation in favor of another community. A split is particularly burdensome for small businesses that will have to expend a great deal of time and money to change all of their literature, including phone directory listings, stationery, business cards, invoices, web pages and advertisements, that contained their old phone number and update them to show their new phone number(s). Based on the Carriers' collective experience in implementing both splits and overlays in other markets, residents in the 801 NPA that live and work outside Salt Lake County will come to realize that dialing a few extra digits will be far more preferable than having their telephone numbers taken away and replaced with new ones.

**ii. An overlay will be less confusing to consumers now and in the long term**

More customer confusion will result from implementing a geographic split than an overlay. One hazard of drawing area code boundaries is the inherently divisive act of partitioning communities of interest – a process that sometimes conflicts with other meaningful geopolitical boundaries. In this case, the adopted split line conflicts with previously established local calling zones within the 801 NPA. As the Commission is aware, consumers currently enjoy local calling between Salt Lake County and most of Davis County. The authorized split line encircles Salt Lake County and cuts across the local calling area between Salt Lake and Davis Counties. As a result, if the split is implemented, customers in Salt Lake County and

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<sup>9</sup> Since 2000, overlays have been implemented in Virginia (2000); North Carolina (2001); Texas (2000 and 2003); Pennsylvania (2001); New Jersey (2001); Florida (2001); Massachusetts (2001); Illinois (2002); Ohio (2002); Michigan (2001); Puerto Rico (2001); Dominican Republic (2005); Mississippi (2005); Georgia (2006); California (2006) and Illinois (2007). See [www.nanpa.com](http://www.nanpa.com). Oregon is also in the process of implementing an expansion to its 971 overlay. See *id.* Of the 32 relief plans not yet implemented, 20 are overlays.

Davis County will need to master three separate dialing patterns: (a) 7 digits for local calls within the same area code and local calling area; (b) 10 digits for local calling between the different area codes, even though the calls are “local;” and (c) 11 digits for any calls that are long distance. On the other hand, if an overlay is implemented, customers would dial 10 digits for every local call throughout the local calling area and 11 digits for long distance calls. Consumers will likely find it more confusing if they must dial 7 digits for some “local” calls within their area code and 10 digits for other “local” calls outside of their area code than it would be to dial 10 digits for all local calls. The overlay will result in less customer confusion because customers can more readily learn to always dial 10 digits for all local calls.

This scenario demonstrates another important point. Splits lead to more splits, progressively dividing closely knit communities and forcing more people to change their phone numbers unnecessarily. The implementation of future splits to the 801 area code will increase the potential that calls will cross local rating zones, further confuse consumers, and complicate future numbering relief efforts. Today, consumers frequently dial ten digits to reach their friends, family and work associates who are located across NPA boundaries. The better long-term solution is an overlay because educating consumers to dial ten digits now will make future relief measures easier to implement.

### **iii. LNP difficulties**

Another important consideration is the FCC's decision requiring telecommunications carriers to provide Local Number Portability (“**LNP**”). Industry experience demonstrates that it is difficult to comply with LNP requirements in an area where an area code split occurs. A split also imposes a technical challenge to carriers who are also required to comply with LNP requirements. The Number Portability Administration Center (“**NPAC**”) houses all of the ported and pooled numbers. During the night of initiating permissive dialing, the NPAC personnel must act to update the database to include both the old and new NPA. Port requests can fail or create a



backlog if the carrier's operational support systems are not in sync with the NPAC. In addition, work also is required to the carriers' Local NPAC databases (LSMS) and networks to include both the old and new NPA and the NXX's associated with each. If this is not accomplished successfully, calls will be misrouted or denied.

**B. THE INDUSTRY HAS DEVELOPED A SUCCESSFUL PLAN TO EDUCATE CONSUMERS ABOUT AN OVERLAY**

The Carriers have learned through experience that the key to success with any relief plan is public education . In particular, the Carriers have valuable experience and extensive knowledge of how best to facilitate a smooth transition to a new ten-digit dialing protocol that occurs when an overlay is implemented. The transition to such arrangements has been extremely successful in many other markets.

Once the Commission orders an overlay in the 801 NPA, the industry is ready to form a public education plan (“**PEP**”) committee. Two industry members already have agreed to co-chair the committee. A list of responsibilities that need to be considered when implementing an overlay is attached as **Exhibit A** to this Request. These activities are conducted by committee and/or by individual companies and include everything from updating websites to mailing letters to senior citizen groups. This list of activities represents “best practices” that have been derived from other PEPs that helped with the successful implementation of NPA overlays in other states. The Carriers would be happy to discuss this plan in detail with the Commission and/or with the Division of Public Utilities staff.

It is important that the industry be afforded sufficient time to do a thorough job of public education. Therefore, we request that the Commission act on this petition and implement an overlay as quickly as possible.

**C. CHANGED CIRCUMSTANCES SINCE ENTRY OF SPLIT ORDER JUSTIFY IMPLEMENTING 385 AREA CODE OVERLAY**

Since the Commission issued its Split Order in 2000, telecommunications service providers have continued to expand their networks and develop and launch products and services in ways that make an overlay of the 385 area code an increasingly more attractive approach. The number of customers that would be required to change their numbers if an area code split is implemented has increased substantially over the past seven years. In addition, policymakers, consumers and carriers have gained significant experience with area code overlays during this same period. These changed circumstances justify a fresh look at the issue.

In recent years, extensive industry experience in the implementation of area code overlays has demonstrated that both carriers and consumers readily adapt to overlays. As mentioned above, since 2000, carriers have implemented 17 overlays under the North American Numbering Plan, including the Dominican Republic (2005), Puerto Rico (2001) and in states across the country: Virginia (2000); North Carolina (2001); Texas (2000 and 2003); Pennsylvania (2001); New Jersey (2001); Florida (2001); Massachusetts (2001); Illinois (2002); Ohio (2002); Michigan (2001); Mississippi (2005); Georgia (2006); California (2006) and Illinois (2007); Oregon (concentrated overlay expanded 2006). The concerns about widespread customer confusion associated with area code overlays that were voiced in 2000 have not materialized in these other jurisdictions where overlays have been successfully implemented.

It is also important to note that the population for the areas in the 801 NPA outside of Salt Lake County has grown substantially since 2000. For the four counties that will be assigned the new NPA under the announced area code split, the population has increased by almost 120,000 from 2000 to 2005.<sup>10</sup> Thus, the number of residential and business customers that will be required to change their telephone numbers with an area code split has likewise grown substantially since 2000.

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<sup>10</sup> According to U.S. Census data, the population of Utah, Weber, Davis and Morgan Counties was 811,192 in 2000. The population for those four counties had increased to 930,580 by 2005.

Finally, in recent years the telecommunications industry has witnessed a nationwide transformation in the way people communicate that has changed consumer needs and priorities. There are now more wireless users than traditional residential wireline customers across the country, with more than 220 million wireless subscribers nationwide. In Utah, the number of wireless customers has more than doubled since the Commission issued its Split Order. In 2000, there were 750,244 wireless subscribers in Utah; in 2005 there were 1,531,763 wireless subscribers.<sup>11</sup>

The significance of this proliferation of wireless usage is that people today are more “mobile” and frequently traverse across regional boundaries to work, commute home, attend school, and seek entertainment. In today’s kinetic society, businesses, both large and small, are finding the use of wireless products and services not only a convenience but “essential” to maintain their competitiveness and increase the productivity and efficiency of their workforce. As a result of these developments, wireless users increasingly associate their number not with a set geographic area, but identify more “personally” with their mobile phone numbers.

Wireless customers increasingly rely on their cell phones not only for work but also as a means to manage their personal lives and to “stay in touch” with friends and family members. It is more important than ever for wireless consumers to be able to keep their phone numbers and not be forced to change their numbers. Overlays can provide a progressive approach to numbering relief in a flexible and accommodating manner, without compelling people to give up their phone numbers. In addition, since most people use their mobile phones to place both local calls and long distance calls throughout the country, most people are already using 10 digit dialing when they dial from their mobile phones. This makes implementation of an overlay, and the 10-digit dialing associated with local calls, even more acceptable and easier than it would

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<sup>11</sup> *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Radio Services*, Eleventh Report, WT Dkt No. 06-17, (rel. Sept. 29, 2006), Table 2.

have been in 2000. The popularity and widespread use of wireless devices and technology has fundamentally changed the economic climate of the state and has altered consumer demands of residents and priorities of many businesses since the Commission's original decision in 2000. The Commission should recognize these developments in determining the most appropriate way to implement numbering relief.

## **V. CONCLUSION**

For the foregoing reasons, the Carriers respectfully request that the Commission: (1) abrogate and rescind its Split Order, and (2) enter a new order implementing an overlay of the new 385 area code over the area that is currently assigned to the existing 801 NPA.

## **VI. REQUEST FOR EXPEDITED DISPOSITION, SCHEDULING ORDER, TECHNICAL CONFERENCE, AND PUBLIC HEARING**

Time is of the essence to solve 801 NPA exhaustion. The Division of Public Utilities has recommended a schedule for permissive dialing for implementing the Split Order. For these reasons, the Carriers request that their Request for Agency Action be scheduled for expedited disposition. The Carriers further request that the Commission enter a scheduling order for disposition of the Carriers' Request for Agency Action that includes an expedited technical conference to discuss technical issues related to a split versus an overlay and a public hearing before the Commission on the Carriers' request for an overlay.

DATED this \_\_\_\_ day of March, 2007.

**SNELL & WILMER L.L.P.**

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## EXHIBIT A

| <b>Committee Responsible</b> | <b>Activity</b> | <b>Description</b>  | <b>Audience</b>                                       | <b>Shared or Individual Carrier Effort</b>   |
|------------------------------|-----------------|---|---|--|
| N/A                          | N/A             | 801 Overlay Order approved  | N/A   | N/A  |
| Task Force                   | Information     | Update Individual Service Provider Company and Commission websites with 801 Overlay information   | All telecom users                                     | Individual                                   |
| Task Force                   | Administration  | Formation of PEP Committee - each carrier to designate a committee representative   | N/A   | Commission Staff and Carrier Representatives |
| Task Force                   | Information     | As Directories are published add a Banner to alert the consumers of 10-digit dialing in the 801 Area Code.  | All Telecom Users                                     | Individual                                   |
| Task Force                   | Information     | Distribute information internally to be used as a tool by customer service representatives in order to answer customer inquiries  | Service Representative                                | Individual                                   |
| Task Force                   | Information     | Notify the appropriate group in Utah to send messages to alert their customers to the 10-digit dialing in the 801 Area Code   | Hearing Impaired                                      | Individual                                   |
| Task Force                   | News Release    | Telecommunication Industry to issue news release which describes the 801 Area Code relief plan (distribute within 801 Area including chambers of commerce and local government agencies)  | All telecom users                                     | Shared                                       |
| Task Force                   | Information     | Telecommunications industry to send information to Chambers of Commerce, city councils, key government agencies, alarm-service providers and public safety organizations (e.g., 911 PSAPs, police, sheriff and fire) throughout the 801 Area. | Select organizations and associations                 | Shared                                       |
| Task Force                   | Information     | Customer Notification No. 1: Announce the new area code plan. Include information about 10-digit dialing and indicate affected areas.   | Resident (including pre-paid ) and Business Customers | Individual                                   |

|  |                    |   |   |  |
|--|--------------------|---|---|--|
| Task Force                               | Information        | Contact key community leaders, legislators, state/local government contacts by letter, phone or visit.  | Key Leaders   | Shared   |
| Task Force                               | Information        | Provide targeted information to advocacy groups (seniors, schools, etc.) by letter, phone or visit  | Seniors and Schools. Etc.                                     | Shared   |
| Technical                                | Information        | Complete the process for developing recorded announcements required for Mandatory Dialing   | Residence and Business Customers                              | Individual   |
| Task Force                               | Public Appearances | Offer speeches or appearances to Chambers of Commerce, economic development organizations, service clubs, and other business organizations.     | Select organizations and associations                         | Shared<br>(Assuming use of Industry Spokesperson(s)) |
| Task Force                               | Information        | Telecommunications industry to issue new release to Utah media regarding approach of "transitional" dialing period.                             | All telecom Users (801 Area Code Area)                        | Shared   |
| <b>Permissive Dialing Begins</b>         |                    |   |   |  |
| Task Force                               | Information        | Customer Notification No. 2: Announce the new area code plan. Include information about mandatory 10-digit dialing and indicate affected areas. | Residence and Business Customers                              | Individual   |
| Task Force                               | Public Appearances | Offer speeches or appearances to Chambers of Commerce, economic development organizations, service clubs, and other business organizations.     | Select organizations and associations                         | Shared<br>(Assuming use of Industry Spokesperson(s)) |
| Task Force                               | News Release       | Telecommunication Industry to issue news release to media regarding the start of mandatory dialing.   | All telecom users (within the 801 NPA and adjacent NPA areas) | Shared   |
| <b>Mandatory Dialing</b>                 |                    |   |   |  |
| <b>New Numbering Resources Activated</b> |                    |   |   |  |

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