

Bradley R. Cahoon (5925)  
Scott C. Rosevear (9953)  
Snell & Wilmer L.L.P.  
15 West South Temple Street, Suite 1200  
Salt Lake City, UT 84101  
Telephone: 801-257-1900  
Facsimile: 801-257-1800  
*Attorneys for Sprint Nextel Corporation,  
T-Mobile West Corporation, and Verizon  
Wireless*

Stephen F. Mecham (4089)  
Brian W. Burnett (3772)  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, UT 84133  
Telephone: 801-530-7300  
Facsimile: 801-364-9127  
*Attorneys for AT&T Mobility, AT&T  
Communications of the Mountain States,  
Inc., and TCG Utah*

George Baker Thomson, Jr.  
1801 California St, Suite 1000  
Denver, CO 80202  
Telephone: (303) 383-6645  
Facsimile: (303) 383-8588  
George.Thomson@qwest.com  
*Attorney for Qwest Corporation*

William J. Evans  
PARSONS BEHLE & LATIMER  
201 South Main St. #1800  
Salt Lake City, UT 84145-0898  
Telephone: (801) 536-6817  
Facsimile: (801) 536-6111  
*Attorneys for MCImetro Access  
Transmission  
Services, LLC d/b/a Verizon Access  
Transmission  
Services*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF TELEPHONE  
NUMBER CONSERVATION  
MEASURES FOR (801) AREA CODE  
RELIEF

IN THE MATTER OF THE REQUEST  
OF THE NORTH AMERICAN  
NUMBERING PLAN  
ADMINISTRATION FOR A NEW  
AREA CODE WITHIN THE (801) AREA  
CODE

**DOCKET NO. 99-999-04**

**DOCKET NO. 09-999-05**

**COMMENTS ON PERMISSIVE DIALING  
PERIOD AND EFFECTUATING AREA  
CODE SPLIT**

Pursuant to the Public Service Commission's ("PSC") February 15, 2007 *Notice For Comments on Permissive Dialing Period and Effectuating Area Code Split*, 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, the "Carriers"), by and through their undersigned counsel, hereby jointly submit *Comments on Permissive Dialing Period and Effectuating Area Code Split*.

On March 23, 2007, the Carriers filed with the PSC a Request for Agency Action (the "**Request**") in which they requested that the PSC (1) abrogate, repeal and rescind its order of April 26, 2000<sup>2</sup> that implemented an area code split as the method of telephone number relief for the 801 NPA (the "**Split Order**"); and (2) enter a new order implementing an overlay of the new 385 area code over the existing 801 NPA. (*See* PSC Docket No. 07-999-01). As set forth in the Request, the Carriers believe that there are substantial reasons for abrogating the Split Order and implementing an overlay. (*See id.*). The Carriers therefore request that, instead of establishing permissive dialing and recorded message interrupt periods for an 801/385 split, the PSC issue an order establishing a schedule for implementing an overlay. At a minimum the Carriers request that the PSC delay its decision on implementing a permissive dialing period and recorded message interrupt for an 801/385 NPA split until such time as the PSC has the

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<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.

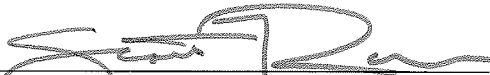
<sup>2</sup> *See In the Matter of Telephone Number Conservation Measures for (801) Area Code Relief and In the Matter of the Request of the North American Numbering Plan Administrator For a New Area Code within the (801) Area Code.*

opportunity to carefully consider the substantial justifications set forth in the Request for abrogating the split order and instead implementing an overlay.

DATED this 30<sup>TH</sup> day of March, 2007.

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


**QWEST CORPORATION**


  
Bradley R. Cahoon  
Scott C. Rosevear  
*Attorneys for Sprint Nextel Corporation,  
T-Mobile West Corporation, and Verizon  
Wireless*

[approved via email 3/29/2007]  
George Baker Thompson, Jr.  
*Attorney for Qwest Corporation*

**CALLISTER NEBEKER &  
MCCULLOUGH**

**PARSONS BEHLE & LATIMER**

  
Stephen F. Mecham  
Brian W. Burnett  
*Attorneys for AT&T Mobility, AT&T  
Communications of the Mountain States,  
Inc.,  
and TCG Utah*

  
William J. Eyans  
*Attorneys for MC Metro Access  
Transmission  
Services, LLC d/b/a Verizon Access  
Transmission Services*