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BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission Investi- )  
gation Into the Allocation of Abbreviated )  
Dialing Arrangements, Such as N-1-1. )

Case No. 93-1799-TP-COI

PUCO

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**COMMENTS OF  
UNITED TELEPHONE COMPANY OF OHIO d/b/a SPRINT,  
SPRINT COMMUNICATIONS COMPANY L.P.  
AND SPRINT SPECTRUM L.P. d/b/a SPRINT PCS**

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United Telephone Company of Ohio d/b/a Sprint, Sprint Communications Company L.P., and Sprint Spectrum L.P. d/b/a Sprint PCS (hereinafter collectively "Sprint") submit Comments pursuant to the March 23, 2000 Entry of the Public Utilities Commission of Ohio ("Entry").

**PUCO Preliminary Finding (a):** That the Ohio Council of Information and Referral Providers ("I&R") joint applicants' proposed use of the 2-1-1 service code appears to be for a broad-based, noncommercial, important public purpose which meets the N-1-1 allocation criteria established by this Commission.

**Sprint Comment:** Sprint believes the proposal to locally assign the "211" dialing code to community services information and referral service is an attractive idea. Sprint recommends however that the Commission await the FCC decision in the matter of 2-1-1 code assignment. Since N-1-1 codes are in limited supply, it behooves the Commission to use caution since customer confusion will often result if the code is ultimately re-assigned by the FCC. Sprint will require six months to implement any new N11 service. Sprint has identified two methods of converting a 2-1-1 call into a call the local network can understand. The first method involves directing the dialed 2-1-1 call to specific trunks dedicated to a call center, and the second method entails programming the software in the switch to translate the 2-1-1 call into the

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appropriate (NPA) NXX-XXXX number. Preferably, this number will be a 1-800 number that could be terminated at a single call center located within the state.

Either situation calls for nonrecurring programming costs to be incurred at each individual switch. Sprint provides both local exchange and PCS service in numerous exchanges in Ohio with a number of diverse calling plans that will need to be addressed during translations. The multiplication of exchanges, dialing plans and number of programming hours required for each plan all point to a significant commitment of resources to implement the proposed assignment. Apart from the associated costs involved, Sprint notes that technician time is a scarce resource and that an appropriate lead-time should be factored into any implementation time schedule.

**PUCO Preliminary Finding (b):** That granting, on a limited basis, the I&R joint applicants' application, to the extent that they would be authorized to establish a two-year pilot use of the 2-1-1 service code for their proposed purpose appears to be in the public interest. Such a grant would, however, be subject to any conditions that the FCC may come to adopt pertaining to the nationwide use of the 2-1-1 service code.

**Sprint Comment:** Sprint agrees that it is appropriate for the Commission to defer to conditions which the FCC may adopt pertaining to the use of any N-1-1 code assignment.

**PUCO Preliminary Finding (c):** That ODOT's proposed one-year extension of its existing pilot project appears to entail the continued use of the 2-1-1 service code for a broad-based, noncommercial, important public purpose which meets the N-1-1 allocation criteria established by this Commission.

**Sprint Comment:** While Sprint agrees that the existing pilot project by ODOT is an important public purpose, Sprint believes that the code should be changed to 5-1-1 to avoid customer confusion. To assign the 2-1-1 code to I&R throughout the majority of the state as the Commission proposes for the purpose of community services information and referral service but

to have it used for travel information in one small portion of the state is counter productive. The purpose of the N-1-1 code is to provide the public with an easy to remember number for a single point of access. Sprint supports the assignment of an N11 code such as 511 for use in the delivery of travel-related information to the public. The U.S. Department of Transportation has sought assignment of the 5-1-1 code on a nationwide basis to facilitate access to advanced traveler information systems.<sup>1</sup> Sprint again advises that the Commission should await the FCC decision in the matter of permanent N-1-1 code assignment.

Having stated Sprint's position however, Sprint would not oppose a limited one-year continuation of the 2-1-1 code by the Ohio Department of Transportation in the Cincinnati-Northern Kentucky Metropolitan Area located in Ohio.

**PUCO Preliminary Finding (d):** That granting ODOT's application for a one-year extension of its existing use of the 2-1-1 service code in the Cincinnati, Ohio area, subject to any conditions that the FCC may come to adopt pertaining to the nationwide use of the 2-1-1 service code, appears to be in the public interest.

**Sprint Comment:** Sprint agrees that it is appropriate for the Commission to defer to conditions which the FCC may adopt pertaining to the use of any N-1-1 code assignment.

## **CONCLUSION**

Sprint recommends the Commission should await determination by the FCC in the assignment of any N-1-1 codes to be utilized throughout Ohio. With the scarcity of N-1-1 codes it is imperative that they be utilized as ubiquitously as possible across multiple states to avoid

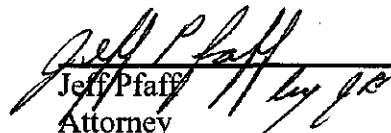
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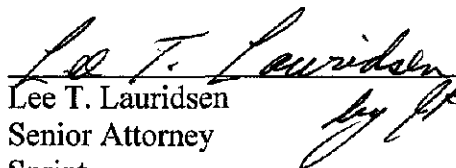
<sup>1</sup> See *Public Notice*, "Petition by the United States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide," CC Docket No. 92-105, NSD File No. L-99-24, DA 99-761 (April 20, 1999).

customer confusion. Sprint would not oppose a limited one-year extension of the use of the 2-1-1 code in the Cincinnati-Northern Kentucky Metropolitan Area located in Ohio

Respectfully submitted,

  
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