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Barcy F. McNeal, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 11th Floor  
Columbus, Ohio 43215-3793

Re: Exhaust Relief for Area Code "740"  
Case No. 13-700-TP-COI

Dear Ms. McNeal:

The AT&T Entities<sup>1</sup> support the proposed overlay to address the issue of relief in the area code 740. Over twelve years ago, the Commission concluded that an overlay was the most appropriate resolution to the relief issue in area code 614. In the Matter of the Commission's Investigation into Exhaust Relief for Area Code "614", Case No. 00-1260-TP-COI, Opinion and Order, May 17, 2001, pp. 9-11. The Commission has acted consistently since then in its other area code relief cases. It should do so here as well.

The success of recent overlay implementations in other states such as the Texas 512 area code and the Pennsylvania 570 area code has demonstrated that the industry can smoothly implement overlays in an effective and efficient manner that minimizes adverse impacts on consumers. Overlays represent a progressive approach to introducing additional numbering resources and are, with one outlier, the exclusive form of area code relief adopted by state Commissions across the country since at least 2005. In earlier years, state Commissions had at times expressed concern for the burden and inconvenience to consumers of ten-digit dialing for calls made within the same area code. Today, however, the possibility of a telephone number change and the resulting burdens associated with the change far outweigh the fear of ten-digit dialing for most customers. In fact, most consumers are already comfortable with making local calls between area codes and dialing ten digits as part of their routine calling patterns.

An overlay is the most efficient relief type with regard to number utilization. Recognition of the efficiency of an overlay is evidenced by the fact that during the past eight years, state Commissions have nearly unanimously (with just one exception in 2006) found overlay relief to be the most preferred and least disruptive relief option. Though consumers must begin using ten-digit dialing, the adjustment to the new ten-digit dialing pattern is only required with the first overlay in a geographic area.

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<sup>1</sup> The AT&T Entities are The Ohio Bell Telephone Company ("AT&T Ohio"), AT&T Corp., Teleport Communications America LLC, and New Cingular Wireless PCS LLC.



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Experience to date across the country with overlays demonstrates that customers can readily adapt to an NPA overlay. From a national perspective, a review of the North American Numbering Plan Administrator (NANPA) website indicates that there are currently six overlays and no splits planned for future implementation. There are over 60 overlay situations in place today, involving 133 area codes in some 20 states. Four states - - Oregon, Maryland, West Virginia, and Connecticut - - have statewide 10-digit dialing. Because of its superior cost-benefit characteristics, the all-services distributed overlay is the relief method of choice for both the telecommunications industry and customers.

Thank you for your courtesy and assistance in this matter. Please contact me if you have any questions.

Very truly yours,

/s/ Jon F. Kelly

Attachment

Certificate of Service

I hereby certify that a copy of the foregoing has been served this 27th day of November, 2013 on the party shown below by e-mail.

/s/ Jon F. Kelly  
Jon F. Kelly

Neustar, Inc.

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Summary: Comments in support of distributed all-services overlay proposal electronically filed by Jon F Kelly on behalf of The AT&T Entities