

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Lockheed Martin IMS, the North American Numbering Plan Administrator, for area code relief for the 508, 617, 781, and 978 area codes in Eastern Massachusetts.

D. T. E. 99-11

In the Matter of Massachusetts Telecommunications and Energy's Petition for Waiver of Section 52.19 to Implement Various Area Code Reservation Methods in the 508, 617, 781 and 978 area codes.

D. T. E. 99-99

AREA CODE IMPLEMENTATION REPORT FILED ON BEHALF OF AT&T FOR INSTITUTING AREA CODE OVERLAYS IN EASTERN MASSACHUSETTS

AT&T Communications of New England, Inc. ("AT&T") on behalf of itself and its affiliates hereby submits a report detailing the procedures by which AT&T will implement four new overlay area codes in Eastern Massachusetts.

Introduction.

By Order in this docket dated April 25, 2000 ("Order"), the Department of Telecommunications and Energy (the "Department") directed all local exchange carriers providing services in Eastern Massachusetts to "file an area code implementation report, . . . within 30 days of the date of this Order." Order at p. 50. The Order required that each implementation report include information regarding the activities, costs, and schedule for implementing the new area codes, necessary network changes, customer education plans, a plan for meeting the special needs of the elderly, the disabled, alarm companies and their customers, and the name or names of individuals for the Department to contact with questions regarding the

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implementation report. Order, at p. 49.

I. COSTS AND SCHEDULE FOR IMPLEMENTING THE NEW AREA CODES.

A. Implementation Schedule.

AT&T believes it will be possible to make our network overlay-ready within three to four months of beginning the required network modifications. Based on this projected schedule, it would be possible to begin the permissive dialing period as early as the Fall of 2000.

B. Implementation Costs

Because AT&T has never implemented an area code overlay in Massachusetts, we have no historical or empirical data upon which to base a cost estimate. However, because most local service in Massachusetts is still being provided by Bell Atlantic, it seems logical that Bell Atlantic will incur the bulk of the costs necessary to prepare for instituting new area codes. AT&T anticipates that its costs in this regard will be relatively small by comparison.

II. ACTIVITIES AND NETWORK CHANGES NECESSARY FOR OVERLAY CODE IMPLEMENTATION.

In order to implement the Department's Order, AT&T anticipates the necessity of making a number of network adjustments. Among the changes which will be necessary are: (1) at the beginning of the permissive dialing period, opening translations in switches to allow those switches to accept local calls dialed as either seven or ten digit calls; (2) at the beginning of the mandatory ten digit dialing period, remove the translations that allow calls to be dialed as seven digit numbers and route customers who dial only seven digits to a recording indicating the need to dial ten digits in order to complete the call; (3) open translations for the new NPA's as valid, dialable/billable NPA's; (4) translate a test line for the new NPA's as per industry standards; (5) open the new NPA's in all OSS's to support billing and other industry activities; (6) open internal test codes to support industry testing across carriers; (7) open test numbers for customer dialing on IntraLATA PIC testing; (8) open directory assistance translations for the new area codes; (9) order, install, and test a new 911 trunk group (if required) for the new NPA's; and (10) revert to normal provisioning processes on a forward going basis for both new and old area codes. One or more other network changes may be necessary to fully implement the Department's Order. As these needs become apparent, AT&T will respond as rapidly as possible on a case-to-case basis.

III. CUSTOMER EDUCATION PLANS.

In order to provide customers with the information they will need to prepare for area code and dialing plan changes, AT&T proposes to send each customer a letter in the form attached as Exhibit 1 to this report (the "Notification Letter"). The Notification Letter will be printed on AT&T generic letterhead, mailed in an AT&T standard size mailing envelope, and drafted to comply with all customer notification requirements established by Neustar and the Department. In compliance with the Department's Order, the Notification Letter will be mailed to customers at least 6 months prior to the beginning of the permissive dialing period, provided the permissive dialing period begins at least six months in the future. This will be the only direct communication the customer receives regarding permissive and mandatory dialing changes unless either Neustar or the Department concludes that additional mailings are advisable.

In addition, AT&T will establish both a web site and phone number which customers may use to ask questions or review additional information regarding the new area codes. This information will be fully communicated to all affected Sales Team and Customer Care Center personnel.

IV. ASSISTANCE TO MEET THE SPECIAL NEEDS OF THE ELDERLY, THE DISABLED, ALARM COMPANIES AND THEIR CUSTOMERS.

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Because AT&T does not currently offer residential telephone service in Massachusetts, issues which are relevant only to that market, such as special assistance for the elderly and disabled, are not a part of AT&T's implementation plan.

Because AT&T offers only commercial local telephone service, AT&T also has little interaction with alarm companies and their customers. AT&T does, however, plan to include in the Notification Letter information regarding the need for commercial customers to contact their alarm monitoring companies and arrange for system reprogramming to accommodate eleven digit dialing. As the Department recognized in its Order, the minimum permissive dialing period of four months should be sufficient to permit alarm companies to complete all necessary reprogramming. Order at 48.

V. AT&T CONTACTS FOR ADDITIONAL INFORMATION.

For additional information regarding the subject matter of this report, the Department should feel free to contact Julie Baerenrodt, AT&T, 99 Bedford Street, Boston, MA 02111, (617) 574-3156 or Kenneth W. Salinger, Palmer & Dodge LLP, One Beacon Street, Boston, MA 02108, (617) 573-0561.

Respectfully submitted,

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Dated: May 25, 2000.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party on May 25, 2000.

EXHIBIT 1

SAMPLE *** AREA CODE OVERLAY LETTER *** SAMPLE

This is to Alert You to a Possible Impact to Your Local Telephone Service.
Please Contact Your PBX Vendor to Ensure Your Dialing Plan

is in Compliance with the Information Provided Below.

Dear Valued Local Services Customer,

Starting May 1, 2001, four new area codes -857, 774, 339, and 351- will be introduced in Eastern Massachusetts. This change is due to Massachusetts' growing communications needs for new residences, telephones, fax machines, modems, cellular phones and pagers.

The 857 area code will overlay the 617 area code; the 774 area code will overlay the 508 area code; the 339 area code will overlay the 781 area code; and the 351 area code will overlay the 978 area code. This means that there will be two area codes each in the same geographic areas. This will affect the dialing patterns of all communities throughout Eastern Massachusetts.

When the overlay area codes are introduced, all existing numbers will retain their current area codes. However new telephone customers or existing customers needing additional lines, may be assigned numbers with the new area codes.

To make the transition to the new area code easier, a permissive time period has been set up in which customers are encouraged to dial 11 digits ("1" + area code + phone number) for all local, extended area service, and toll calls both within and between the new and existing area codes. The permissive period will begin on [DATE] and end April 30, 2001. After that time, 11-digit dialing for all local, extended

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area service, and toll calls both within and between the new and existing area codes will be required to complete the call. It makes no difference whether your call is to the same area code. For example, calls from 617 to 617, 617 to 857, 857 to 857, or 857 to 617 will require eleven-digit dialing. Callers who dial less than 11 digits will receive a recorded message reminding them to dial 11 digits. They will then be required to redial the number.

Although dialing patterns will change, the new area codes do not affect rates or local calling areas. A local call is still a local call; a toll call is still a toll regardless of the dialing pattern.

During the transition period, you should plan to make necessary equipment updates and other important changes. Things to do include:

Reprogram services such as Speed Calling, Call Forwarding, Auto Dialing, fax machines, modems, or alarm reporting systems with the new area code. Additionally, if you have a PBX with Automatic Route Selection or Least Cost Routing you may need to have them reprogrammed. (Please contact your PBX vendor if you have questions.)

If you have an alarm system which is connected to a monitoring company via phone lines, contact your alarm company and make sure that your system is reprogrammed to accommodate ten or eleven digit dialing.

Update preprinted forms, checks, stationery, business cards, advertising, and related items to reflect your appropriate area code.

Let business associates, friends, and family know of the area code change and the need to dial all eleven digits of your telephone number.

This information is provided as part of AT&T's service commitment to our customers.

If you have questions regarding your local calling area or the area code changes, please call [NUMBER TO BE ESTABLISHED] or visit [WEB SITE TO BE ESTABLISHED].

Thank you for your business.

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AT&T Local Service Director