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November 30, 2000

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
2nd Floor
Boston, MA 02110

RE: D.T.E. 00-64, 413 Area Code Relief, Reply Comments

Dear Ms. Cottrell:

SNET Wireless, Inc. submits the following Reply Comments.

In his Reply Comments filed today, the Attorney General proposes that the Department reject the request of the telecommunications industry that the Department issue an area code relief order within the next two months, and instead, the Department should delay issuing a relief order until NeuStar, Inc. declares the 413 area code to be in jeopardy. AG Reply Comments, November 30, 2000, p. 1. There is no reasonable basis for the delay requested by the Attorney General.

In its petition filed in August with the FCC, the Department indicated its "heightened concern over the impending lack of numbering resources" in the 413 area code. (1) The Department also noted that NXX codes in the 413 area code are being distributed at a rate far greater than that forecast, which will create a premature exhaust of the 413 area code unless measures are taken to create new number resources. The Attorney General apparently agrees with this assessment and in comments filed September 27, 2000 on the Department's petition to the FCC, the Attorney General stated that although NeuStar, Inc. has not yet declared that the 413 area code is in jeopardy, the current usage rate of NXX codes in 413 is consistent with exhaustion of the code within 18 months, and, in effect, the 413 NPA is now in a jeopardy situation. (2)

In light of this assessment by both the Department and the Attorney General, it would be prudent, and in no way premature, for the Department to issue an area code relief order in this proceeding as quickly as possible.

Very truly yours,

Robert L. Dewees, Jr.

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cc: Paula Foley, Hearing Officer
Michael Eisenberg, Director, Telecommunications Division
Service List

RLD/pjm

1.

1 Massachusetts Department of Telecommunications and Energy's Petition for Delegation of Additional Authority to Implement Number Conservation Measures in Massachusetts, NSD-L-00-169, CC Docket No. 96-98, dated August 2, 2000, p. 4.

2.

2 Massachusetts Attorney General's Comments on the Massachusetts Department of Telecommunications and Energy's Petition for Delegation of Additional Authority to Implement Number Conservation Measures in Massachusetts, NSD-L-00-169, CC Docket 96-98, dated September 27, 2000, p. 4.