



Writer's E-Mail Address: bkeating@gunster.com

May 26, 2015

E-PORTAL

Ms. Carlotta Stauffer, Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Petition of Frontier Communications of the South, LLC for Approval of Implementation of
1+10 Digit Dialing for the Walnut Hill and Molino, Florida Exchanges

Dear Ms. Stauffer:

Attached for electronic filing, please find the Petition of Frontier Communications of the South, LLC's Petition for Approval of Implementation of 1+10 Digit Dialing in the Walnut Hill and Molino, Florida Exchanges for Inter-NPA calls.

As always, if you have any questions whatsoever, please do not hesitate to contact me.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Frontier Communications of) Docket No.
the South, LLC, for approval of)
implementation of 1+10-digit dialing for the) Filed: May 26, 2015
Walnut Hill and Molino, Florida Exchanges)
)

PETITION FOR APPROVAL OF IMPLEMENTATION OF 1+10-DIGIT DIALING FOR THE WALNUT HILL AND MOLINO EXCHANGES

Frontier Communications of the South, LLC (“Frontier” or “Company”), by and through its undersigned attorneys, pursuant to 47 C.F.R. § 52.19 and Section 364.16(7), Florida Statutes, hereby petitions the Florida Public Service Commission (“Commission”) to approve the implementation of 1+10-digit dialing for the Molino, Florida (850-587) and Walnut Hill, Florida (850-327) exchanges applicable to all inter-numbering plan area (“NPA” or “area code”) calls.

In support of this petition, Frontier states:

PARTIES

1. Frontier is a certificated local exchange telecommunications company with its principal place of business located at:

Frontier Communications of the South, LLC
300 Bland St.
Bluefield, West Virginia 24701

2. The name and mailing address of the persons authorized to receive notices are:

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
bkeating@gunster.com

Angela McCall
Manager-Government &
External Affairs
Frontier Communications
300 Bland St.
Bluefield, WV 24701

JURISDICTION

3. The Commission has jurisdiction to address these issues pursuant to Section 364.16(7), Florida Statutes, and 47 C.F.R. § 52.19. Section 364.16(7), Florida Statutes provides that:

In order to ensure that consumers have access to different local exchange service providers without being disadvantaged, deterred, or inconvenienced by having to give up the consumer's existing local telephone number, the commission must make sure that all providers of local exchange services have access to local telephone numbering resources and assignments on equitable terms that include a recognition of the scarcity of such resources and that are in accordance with national assignment guidelines.

47 C.F.R. § 52.19 provides, in pertinent part, that:

(a) State commissions may resolve matters involving the introduction of new area codes within their states. Such matters may include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education efforts regarding area code changes.

(b) State commissions may perform any or all functions related to initiation and development of area code relief plans, so long as they act consistently with the guidelines enumerated in this part, and subject to paragraph (b)(2) of this section. For the purposes of this paragraph, initiation and development of area code relief planning encompasses all functions related to the implementation of new area codes that were performed by central office code administrators prior to February 8, 1996. Such functions may include: declaring that the area code relief planning process should begin; convening and conducting meetings to which the telecommunications industry and the public are invited on area code relief for a particular area code; and developing the details of a proposed area code relief plan or plans.

4. The Company is unaware of any material facts in dispute in this regard. This is a Petition representing an initial request to the Commission, which is the affected agency located at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399. As such, the Company cannot state when and how it became aware of the Commission's decision.

BACKGROUND

5. Frontier currently serves certain exchanges in northwest Florida, including the Molino exchange, which is in Escambia County, as well as the Walnut Hill exchange, which is just north of the Molino exchange.

6. At present, both Pensacola, Florida and McCullough, Alabama are included in the local calling area for Frontier's customers in the Walnut Hill, Florida exchange. As such, customers in the Walnut Hill exchange utilize 7-digit dialing when making calls to both Pensacola and McCullough.

7. Frontier has learned that New Cingular Wireless PSC, LLC ("NCW") recently opened the codes 251-261 in McCullough, Alabama and 850-261 in Pensacola, Florida. As such, when NCW actually begins offering customers phone numbers 261 numbers in either the 850 area code or the 251 area code, calls from Frontier customers in Walnut Hill may not properly translate.

8. For example, a customer in Walnut Hill, FL (850-327) may attempt to reach a business in McCullough, AL by dialing a 7-digit number as the customer has in the past. If the business has been assigned a number, such as 261-1234, that call to the business in McCullough may not complete, or it may be sent to a potential, identical number in Pensacola, FL, because 261-1234 also belongs to a customer in Pensacola, FL. Since Walnut Hill currently has 7-digit dialing into both McCullough and Pensacola, this is a very likely scenario due to NCW opening 261 number blocks in both areas. The same would be true if a customer in Walnut Hill (850-327) is contacting a friend or family member in Pensacola, FL and dials 261-7890. Because Pensacola is included in the customer's local calling area, along with McCullough, AL, the call may not complete or may be switched to McCullough, AL, to a customer with that number. If, however,

Frontier Petition

the customer were required to also dial the area code when placing a call, the call would then properly translate to the appropriate switch and ultimate destination.

9. In light of this situation, Frontier anticipates imminent problems with calling routing in this area, as well as associated customer confusion and frustration. Therefore, Frontier asks to be allowed to implement mandatory 1+10-digit dialing for the Walnut Hill exchange for all inter-NPA local calls. This would require customers in Walnut Hill to dial 1+ 10 digits when making calls that are within their assigned local calling area but are not in their assigned NPA. Thus, Walnut Hill customers will dial inter-NPA calls the same way in which they place long distance calls. By implementing this requirement, customers will not have to distinguish when making Inter-NPA local versus long distance calls. For example, if 1+10-digits is approved, customers in Walnut Hill, Florida will be required to dial 1+10 digits when placing a call to McCullough, Atmore, or Huxford, AL, just as they are required to do when calling any other exchange in Alabama other than these three.

10. Frontier is also asking that this request for 1+10-digit dialing be applied to the Molino exchange as well. Because of the close proximity and community of interest between Molino and Walnut Hill, Frontier anticipates that applying the dialing requirement to both exchanges will reduce avoid confusion that could otherwise arise by virtue of a notification campaign in applicable to just one of these exchanges.

11. Frontier proposes to provide customer awareness, notification and education by following similar requirements as with an area code split or overlay. The proposed notification would include, but not be limited to, the following:

- Newspaper release advising of the upcoming requirement;
- Bill Inserts or direct mail to all existing customers in Walnut Hill and Molino, Florida;

Frontier Petition

- 30-day permissive period before mandatory 1+10-digit dialing; and
- At end of the permissive period, customers will be routed to a recording stating they must dial a “1+ the area code” when making local calls outside the state of Florida.

12. Customers in the Walnut Hill and Molino exchanges would not incur long distance charges when making calls within their assigned local calling area, even though the customer has dialed a 1+10-digit number. Programming in the switch will be set to recognize the NXX associated with these exchanges and route the call over the local extended area service trunks, instead of long distance trunks thereby avoiding any long distance charges or a transfer to outside carriers.

13. Frontier respectfully urges the Commission to approve this request. Frontier further suggests that the implementation of 1+10-digit dialing will not cause any undue hardship to customers, will not increase charges for inter-NPA calls within the assigned local calling areas, and will avoid mis-routed calls as well as any associated customer frustration and confusion.

14. Moreover, implementation of 1+10-digit dialing now will avoid subsequent similar issues, which may otherwise be inevitable. Frontier anticipates that, even if the situation regarding NCW’s use of the 261 number blocks in these areas were specifically addressed, such as by requiring NCW to return those blocks, the problem will quite likely arise again through assignment of identical NXX number blocks in the 850 and 251 area codes to another carrier or carriers. As such, Frontier believes that this request is timely and the action requested is prudent.

REQUEST FOR RELIEF

WHEREFORE, for the foregoing reasons, Frontier Communications of the South, LLC respectfully requests that the Commission approve the implementation of 1+10-digit dialing for

Frontier Petition

the Walnut Hill, Florida and Molino, Florida exchanges for all inter-NPA calls.

RESPECTFULLY SUBMITTED this 26th day of May, 2015.



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

*Attorneys for Frontier Communications of the
South, LLC*

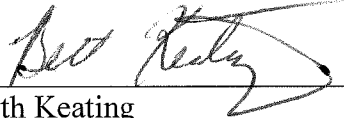
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by U.S. Mail or Electronic Mail this 26th day of May, 2015.

J.R. Kelly
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Tom Foley, Relief Planner
Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779
Phone: 407-389-8929
FAX: 407-682-1108
Email: thomas.foley@neustar.com

By: _____



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706