



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

June 25, 2015

**E-PORTAL**

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

Re: Docket No. 150151-TL -- Petition for approval of implementation of 1+10-digit dialing for Walnut Hill and Molino, Florida exchanges, by Frontier Communications of the South, LLC.

Dear Ms. Stauffer:

Attached for electronic filing in the referenced docket, please find a copy of the Responses of Frontier Communications of the South, LLC to the First Data Requests to the Company from Commission Staff in the above-referenced matter.

As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

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

cc: Catherine Beard

**Docket No. 150151-TL -- Petition for approval of implementation of 1+10-digit dialing for Walnut Hill and Molino, Florida exchanges, by Frontier Communications of the South, LLC.**

Below, please find the responses of Frontier Communications of the South, LLC to the Commission Staff's First Data Requests to the Company, issued on June 10, 2015.

**1) In paragraph 7 of Frontier's petition, it states that:**

**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.**

**What were the exact dates each of these codes were opened?**

Company Response: Frontier obtained its information from the LERG (Local Exchange Routing Guide) and no effective date is shown in that database. As such, Frontier is not aware of the precise date upon which these codes were opened.

**2) In Florida, 1 + 10 dialing has been reserved for calls which incur toll charges. Why does Frontier believe it should use 1 + 10 dialing instead of just 10-digit dialing?**

Company Response: The Company is not opposed to the implementation of 10-digit dialing, as opposed to 1+10 digit dialing. However, in other Frontier markets, 1+10 digit dialing is used to dial inter-NPA local calls, and Frontier would like to be consistent throughout its footprint for purposes of administrative ease and efficiency.

**3) How many carriers would be affected by Frontier's proposed changes? Please list them.**

Company Response: The LERG indicates the 850-261 and 251-261 are 10-digit dialed calls and traffic is currently being delivered utilizing 10-digits. There would not be any impact to other carriers if Frontier made the change to 1+10-digit dialing. The translations would be handled in the switch.

**4) Has Frontier communicated with any of the affected carriers (including New Cingular Wireless) about Frontier's proposed changes? If so, please provide a summary of the discussion(s).**

Company Response: No. To the best of Frontier's knowledge, our changes would not affect the called party or other carriers in any way, shape, or form.

**5) A September 26, 2014 e-mail from Frontier to Florida PSC staff indicated it was experiencing the same issue in Alabama and would be reaching out to the Alabama PSC with the same request. Has this been done? If so, what is the status of your request?**

Company Response: In the early stages of assessing the issue, the Company was unclear as to the scope of the issue, which resulted in some confusion and the referenced letter to the Florida PSC staff. The Company has since determined that this issue does not affect Alabama customers. As such, no request has or will be made to the Alabama PSC for 10-digit dialing.

**6) The NANPA utilization worksheet shows utilization from 87% to 97.80% for the 10 blocks of 850/261, and apparently with no complaints. Has Frontier received complaints about a code conflict? If so, how many and over what period of time?**

Company Response: No complaints have been filed to date. Frontier is being pro-active in their request for 1+10-digit dialing in an effort to reduce or avoid customer confusion and potential complaints.

**7) Has Frontier altered anything recently, such as EAS or ECS routes, which would have caused this problem?**

Company Response: No.