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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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<b>IN THE MATTER OF THE PETITION</b>	)	
<b>OF THE NORTH AMERICAN</b>	)	
<b>NUMBERING PLAN</b>	)	
<b>ADMINISTRATOR FOR THE</b>	)	Case No. GNR-T-00-36
<b>APPROVAL OF NUMBERING PLAN</b>	)	
<b>AREA RELIEF FOR THE 208 AREA</b>	)	
<b>CODE.</b>	)	

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**AT&T's COMMENTS**

AT&T Communications of the Mountain States, Inc. ("AT&T") hereby submits its Comments in response to the Idaho Commission's Notice of Modified Procedure, Notice of Comment Deadline (Order No. 28819 hereinafter referred to as "Notice") relating to area code relief options for the 208 area code.

AT&T supported an all-services overlay for the 208 area code in conjunction with the rest of the Idaho telecommunications industry, as reflected in the Petition filed by NeuStar, Inc. AT&T endorsed this plan as being the least disruptive to customers in that no existing businesses or residents would need to change their area code. Also, AT&T supported the all-services overlay plan because its projected life of 10 years was greater than any of the other relief plans considered.

Based on public input, the Idaho Commission in its Notice has indicated that it views an all-services overlay as less preferable to a geographic split because an all-services overlay would require 10-digit dialing in both the 208 area code as well as the newly created area code for all calls, including those calls made in the same area code. The Notice also states that a technology-specific overlay may be the best option for area code relief in Idaho, and asks parties to comment on the merits of two geographic split plans as well as a technology-specific overlay.

AT&T advocates an all-services overlay; however, we believe that if the Commission decides the disadvantages, namely the 10-digit dialing requirement, of an all-services overlay outweigh the benefits, then the Commission should adopt either Split Plan #1 or #2, which are under consideration. AT&T views both split plans similarly and does not favor one over the other. Both seem to keep communities of interest intact. Also, NeuStar has projected exhaust dates for the newly configured area codes that are much the same.

AT&T, however, asks the Commission to eliminate a technology-specific overlay (most often thought of as a “wireless” overlay) from consideration. As the Commission noted in its order, technology-specific overlays are currently prohibited by FCC rules. Even though the FCC has indicated it may revisit its prohibition on technology-specific overlays, AT&T believes a technology-specific overlay would be problematic if implemented in Idaho, and could very easily not provide sufficient and effective relief.

AT&T strongly suspects that a technology-specific (wireless) overlay in Idaho would run the risk of being tremendously under-utilized. We also suspect that if a “wireless” area code was created in Idaho, the remaining 208 “wireline” area code would be susceptible to much earlier exhaust as compared to the exhaust projections for an all-services overlay or either of the

geographic splits under consideration. Additionally, to provide any real and lasting relief for the 208 area code, it would seem that existing wireless customers with 208 area code telephone numbers would need to “give-back” their telephone numbers in the 208 area code and be assigned new numbers in a newly created “wireless” area code. This in and of itself seems an unreasonable proposition for existing wireless customers who would suffer the cost and inconvenience of surrendering their existing phone numbers, reprogramming their equipment, changing to new numbers, and informing callers of their new numbers. This would clearly create an uncompetitive disadvantage for wireless carriers and thus could be in violation of the 1996 Federal Telecommunications Act.

AT&T appreciates the opportunity to submit these Comments and looks forward to working with the Idaho Commission on implementing appropriate area code relief which will best serve the residents and businesses of Idaho.

Respectfully submitted this 13<sup>th</sup> day of September, 2001.

**AT&T COMMUNICATIONS OF THE  
MOUNTAIN STATES, INC.**

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