

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,) Application No. C-3338/PI-
on its own motion, to conduct an) 91
investigation into the possible)
impacts of implementing a)
nationwide overlay of a single) ORDER OPENING DOCKET
area code dedicated to the)
Department of the Navy with)
local dialing from all existing)
exchanges to all exchanges)
within the new area code.) Entered: January 25, 2005

BY THE COMMISSION:

The Nebraska Public Service Commission (Commission) hereby opens the above-captioned docket, on its own motion, to investigate the impacts on carriers with facilities or numbering resources within Nebraska resulting from the implementation of a request by the Department of Navy (DON) for a nationwide overlay, described more fully below.

On October 11, 2004, the DON submitted Issue Statement 459 to the Industry Numbering Committee (INC) for consideration. The Issue requested the DON be granted one (1) single Number Plan Area (NPA), (366) to manage and provide for its own use with its numerous services providers. This NPA would be for exclusive use of the DON and would be a geographic overlay NPA for the United States portion of the Country Code 1 NPAs. All current DON number resources would be returned to their service providers within the affected area and potentially could be returned to NANPA once the conversion to NPA 366 is completed.

On November 4, 2004 the Department of the Navy's INC Issue was presented to the North American Numbering Council (NANC) who instructed INC to review the request for technical feasibility and report back to the NANC as to whether the submission is technically feasible and does not cause technical problems for the existing telecommunications numbering plan. The INC is not to review the business case or policy components of this request. As of this date the INC is still investigating the technical feasibility of the DON request.

In various presentations on this request the DON has indicated the need is driven by Command and Control issues, increased mobility of units comprising the DON, and "homeland security issues". The dedicated numbering resources would be used for all DON wireline, wireless, fax, pager, inbound modem, and VoIP applications. The DON intends that all numbers would be

reachable from any telephone on the public switched telephone network (PSTN) as a local call.

Implementation of the DON request potentially impacts both the citizens of Nebraska and the telecommunications carriers serving Nebraska. Therefore, the Commission staff is soliciting input from all certificated carriers with facilities in Nebraska or certificated carriers using numbering resources assigned to Nebraska Area Codes 308 or 402 on the following topics. This list is not considered all-inclusive and carriers should feel free to identify and respond to other issues or concerns.

Carrier Related Issues

1. Technical Impacts
 - a. Capability of switch software to implement NPA overlay
 - b. Capability of switch hardware to support any necessary software
 - c. Call Routing
 - d. Call Rating
 - e. Necessary changes in policies and procedures
2. Revenue Impacts
 - a. Access charges
 - b. Nebraska USF
 - c. Nebraska Relay
3. Local Number Portability
4. Impact on 911
5. Impact on Nebraska Universal Service Fund
6. Impact on Nebraska Relay Fund
7. Estimated Costs to Carriers to implement the DON request
8. Any cost recovery anticipated to implement the DON request
9. Impact on the availability and long-term use of numbering resources in the 308 and 402 area codes
10. Billing
 - a. Consumer billing
 - b. Inter-carrier compensation
11. Impact on lawful intercept
12. Impact on GETS

Consumer Related Issues

1. Need for ten-digit dialing for all calls
2. Consumer education

3. Costs to Consumers resulting from the implementation of the DON request

The Commission requests written comment from all interested parties related to the issues listed above **on or before February 25, 2005 at 5:00 p.m.** All parties filing comments should file one original, five paper copies and one electronic copy in MS Word or Excel format. Electronic copies may be submitted either in disk/CD format with the response or sent via email to amelton@mail.state.ne.us and abogus@mail.state.ne.us.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that the above-captioned docket be, and it is hereby, opened to solicit comments from all carriers with facilities or numbering resources within Nebraska regarding impacts of the Department of Navy's request for a nationwide overlay as described herein.

IT IS FURTHER ORDERED that interested parties submit written comments related to the issues listed above on or before **5:00 p.m. on February 25, 2005.** All parties submitting comments should provide one original, five paper copies and one electronic copy in MS Word format on a disk/CD or sent via email to amelton@mail.state.ne.us and abogus@mail.state.ne.us.

MADE AND ENTERED at Lincoln, Nebraska, this 25th day of January, 2005.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chairman

ATTEST:

Executive Director