

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,) Application No. C-3447/PI-101
on its own motion, to review the)
Qwest Corporation rate center) ORDER APPROVING RATE CENTER
consolidation plan.) CONSOLIDATION
)
) Entered: August 30, 2005

BY THE COMMISSION:

The Commission opened this docket on July 19, 2005, to review the rate center consolidation plan proposed by Qwest Corporation (Qwest). Notice of this proceeding appeared in the Daily Record, Omaha, Nebraska on July 20, 2005.

Qwest proposes to consolidate the Gretna, Elkhorn, and Omaha rate centers into one rate center at Omaha without any changes to existing local calling for Omaha subscribers while expanding the Extended Area Service (EAS) provided to Gretna and Elkhorn subscribers.

Customers may be affected in that long distance rates could be impacted by changes made to the rate center Vertical & Horizontal (V&H) coordinates associated with the rate center where the calls originate and terminate. Because the distance between two rate centers is the airline mileage calculated using V&H coordinates, and this distance may be used in determining toll charges, some change in toll charges may result if the plan is approved.

The Commission sought comments from interested parties on Qwest's proposed rate center consolidation. On August 22, 2005, Cox Nebraska Telcom, LLC (Cox) filed comments in support of the proposed rate center consolidation. No party opposed Qwest's rate center consolidation plan.

The Commission, by virtue of authority delegated by the Federal Communications Commission (FCC) [FCC order 00-104, Docket No. 99-200, Number Resource Optimization], is responsible for the conservation of telephone numbers in the state of Nebraska. One recommended methodology for number conservation is the consolidation of telephone rate centers.

Rate centers encompass specific geographical areas and historically have been used by the telecommunications industry to distinguish between local and toll calls. Small rate centers may contain only a single exchange or switch, whereas larger rate centers may consist of multiple exchanges and/or switches. As local calling areas have expanded or otherwise

changed over the years, it has become evident that there are situations where two or more rate centers have exactly the same local calling area and are contiguous to one another. In fact, it is these scenarios that represent the best candidates for consideration of rate center consolidation.

F I N D I N G S A N D C O N C L U S I O N S

NXX codes are assigned by rate center, not by exchange. Each rate center operated by an incumbent local exchange carrier (ILEC) has at least one prefix, or NXX, associated with it. An NXX contains 10,000 telephone numbers (NXX-0000 through NXX-9999). Prior to the roll-out of number pooling, if a competitive local exchange carrier (CLEC) wished to serve customers within an ILEC rate center, the CLEC would also be assigned an entire NXX. Consequently, in many cases, large quantities of numbers have gone unused or are stranded.

Consolidating two or more rate centers brings additional benefits. With the implementation of local number portability, customers may port their numbers anywhere within the new rate center. Also, with number pooling, service providers may also donate to and receive numbers in blocks of 1,000 from the pool for use throughout the entire consolidated rate center. This will result in reducing the demand for assignment of full NXX codes, minimizing unused or stranded numbers and ultimately delaying the exhaust of the area code. Based upon data obtained from the Pooling Administrator's web site on August 25, 2005, the proposed consolidation will add 101 additional blocks of 1,000 numbers to the new consolidated Omaha rate center increasing the available pool from 159 blocks to 206 blocks.

There has been significant population growth in the immediate areas surrounding Omaha, whereby there are no longer any significant geographical distinctions between Omaha, Gretna, and Elkhorn. The boundaries of the present rate centers wind through cohesive residential neighborhoods and through adjacent business districts. The rate center boundaries are not known to consumers, and are even difficult for competitive carriers to discern. As customers relocate within the Omaha metropolitan area, they expect the equivalent telephone service and calling areas, as well as the ability to port the existing telephone numbers to their new locations.

Rate center consolidation must preserve the integrity of the E911 routing system. Qwest assures the Commission the selective routers serving the candidate rate centers are configured to properly route calls to the correct public safety answering points (PSAP) after consolidation. Once two or more

rate centers consolidate, local number portability practices will allow customers moving within the newly-formed rate center to take their number with them to a new location which may be in an area previously part of a separate rate center. For this reason, the PSAPs operated by emergency service providers must be able to recognize all NXXs in the newly consolidated rate center.

Based on the guidelines described above, the Commission finds that three Qwest rate centers in Nebraska can be consolidated into one. This consolidation (shown below) can be accomplished without changes to the existing local calling areas for Qwest customers or changes to the Qwest network while expanding the Extended Area Service (EAS) provided to Gretna and Elkhorn subscribers.

<u>Existing Rate Center Name</u>	<u>Consolidated Rate Center Name</u>
Gretna (GRETNA)	
Elkhorn (ELKHORN)	
Omaha (OMAHA)	Omaha (OMAHA)

In determining timing for implementation of rate center consolidation, the Commission takes into consideration recommended intervals for industry notification through Telcordia's BIRRDs database (Business Integrated Rating and Routing Database System) and its output products (notably the Local Exchange Routing Guide), as well as required network disclosures. Service providers are advised that information about the consolidated rate centers may include revised vertical and horizontal coordinates used to determine distance between rate centers and whether a call is local or should be billed as toll.

In addition, because the enhanced EAS for Elkhorn will result in traffic crossing the LATA boundary between the North and South portions of the 402 Area Code, the FCC will be required to grant Qwest a waiver for this traffic.

Qwest requested a period of four (4) to six (6) months to achieve consolidation and has also requested that such consolidation not be scheduled to occur during the periods of December 15 through January 15 and June 15 through July 15 to prevent impact upon the Numbering Resource Utilization Forecast (NRUF) reports which are based upon rate center definitions and required of all carriers.

O R D E R

IT IS THERFORE ORDERED by the Nebraska Public Service Commission that Qwest initiate the implementation of rate center consolidation as described herein.

IT IS FURTHER ORDERED that consolidation shall be complete within six months of the effective date of the FCC's LATA boundary waiver order.

IT IS FURTHER ORDERED that the consolidation shall be timed not to conflict with NRUF data gathering.

IT IS FINALLY ORDERED that Qwest shall notify the Commission of the projected date of consolidation at least 30 days prior to consolidation taking effect.

MADE AND ENTERED at Lincoln, Nebraska, this 30th day of August, 2005.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chairman

ATTEST:

Executive Director