

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re: BellSouth Telecommunications, Inc.'s Jeopardy Filing of New Area Code for the 770 Area Code and 404 Area Code)))	Docket No. 7423-U
In Re: NeuStar, Inc., North American Numbering Plan Administration f/k/a Lockheed Martin IMS North American Numbering Plan Administration: 678 Area Code Relief)))))	Docket No. 10448-U
BellSouth Telecommunications, Inc.'s Rate Center Consolidation Plan For the Atlanta Metropolitan Local Calling Area)))	Docket No. 11153-U

INDUSTRY REPORT ON RATE CENTER CONSOLIDATION

July 17, 2000

Participating Companies/Entities:

2nd Century Communications, Inc.	Hall County
Allegiance Telecom of Georgia, Inc.	Intermedia
ALLTEL Communications, Inc.	ITC/DeltaCom
AT&T Communications of the Southern States, Inc.	WorldCom, Inc.
BellSouth Telecommunications, Inc.	Mindspring
BellSouth Mobility Inc.	NewSouth Communications
CI2, Inc.	One Point
Cable Television Association of Georgia	Rent-a-Line Telephone Company, LLC
City of Eastpoint	Rockdale County
Consumers Utility Counsel	Sprint Communications Company L.P.
Georgia Public Communications Association, Inc.	Teligent, Inc.
Georgia Telephone Association	Union City
Fayette County	US LEC of Georgia, Inc.
Fulton County	Verizon Wireless
Georgia Emergency Management Association	WinStar Communications, Inc.

TABLE OF CONTENTS

- I. Mission Statement
- II. Background
- III. Rate Center Consolidation Description
- IV. Rate Center Consolidation Methodology
- V. Rate Center Consolidation Considerations
- VI. Analysis of Technical Issues
 - A. Toll-free calling
 - B. Rate Center Name Change
 - C. E9-1-1 Impacts
- VII. Timeline
- VIII. Recommendation

I. Mission Statement

On October 20, 1999, the Georgia Public Service Commission (“Commission”) held an industry workshop to consider a rate center consolidation (“RCC”) plan for the Atlanta metropolitan local calling area. At the workshop the Commission charged the Georgia Telecommunications Industry to:

Identify, evaluate, and recommend the most efficient manner in which to implement Rate Center Consolidation within the metropolitan Atlanta area in a manner that will facilitate an uninterrupted supply of telephone numbers for telecommunications customers while minimizing the need for new NPAs with the state.¹

Thereafter, the industry held a series of meetings, formed subcommittees, and ultimately reached consensus on a recommendation for a RCC plan in Georgia. This report will explain the industry’s recommendation.

¹ Introductory comments of Ralph W. Trammell, Utilities Analyst – Georgia Public Service Commission.

II. Background

On March 12, 1997, BellSouth Telecommunications, Inc. (“BellSouth”) notified the Commission that the 770 NPA was being placed in jeopardy status. After public meetings and a formal hearing occurred, the Commission entered an Order on August 7, 1997 implementing an all services overlay to relieve both the 770 and 404 area codes. As part of that Order, the Commission directed that RCC be studied as a potential conservation measure relating to area code exhaust. On January 12, 1999, Ralph W. Trammell, issued a memorandum noting the Commission’s concerns relating to the exhaust of the 678 area code and recommending that a conservation plan, including RCC as a solution, should be developed. Thereafter, BellSouth presented oral status reports outlining its RCC efforts to the Commission during its Telecommunications Committee meetings on March 11, 1999 and April 29, 1999. In response to the Commission’s August 7, 1997 Order and in response to the Commission’s concerns relating to area code exhaust, BellSouth filed a Report on RCC with the Commission on July 15, 1999.²

Beginning October 20, 1999, the first of six RCC industry workshops took place. The Commission scheduled the initial workshop; industry participants and the Commission scheduled subsequent workshops. BellSouth was nominated by the industry to chair the task force. Participants in the task force include those companies listed on the title page of this report. Industry discussions centered on all issues, particularly upon the technical challenges facing the industry in implementing RCC. The industry identified three specific areas of concern that required resolution to successfully implement RCC:

1. Toll-free calling³
2. Rate Center Name Change
3. E-911 Impacts

Three sub-committees were formed to address the above issues. These sub-committees examined each issue and provided recommendations to the entire industry task force. The issues and the proposed resolution will be discussed *infra*, Section III.

On May 16, 2000, in its administrative session, the Commission decided not to implement a new area code in the 678 NPA. In its written order dated June 1, 2000, the Commission ordered, in part, that the industry submit a report within 45 days that addresses “accelerating the move to rate center consolidation in the metropolitan Atlanta area.” (Docket No. 10448-U). This report responds to the June 1, 2000 Order and also represents the culmination of industry efforts that began with the Commission’s order to study RCC in Docket No. 7423-U and continued with the filing of BellSouth’s report in Docket No. 11153-U.

² BellSouth’s initial report was filed in Docket No. 7423-U. In its Administrative Session on August 17, 1999, the Commission opened a new docket, Docket No. 11153-U, for the purpose of holding workshops on RCC in the Atlanta Metropolitan calling area.

³ O.C.G.A. §46-2-25.1 mandates countywide toll-free calling; O.C.G.A. §46-2-25.2 mandates sixteen mile toll-free calling; O.C.G.A. §46-2-25.3 mandates twenty-two mile toll-free calling.

III. Rate Center Consolidation Description

A “rate center” (“RC”) is a specific geographic location, identified by vertical and horizontal coordinates, associated with a telephone company’s central office (“CO”) switch, and used to calculate mileage for inter and intra LATA toll billing and inter-company settlement purposes. The RC is also used to provide specific customer information regarding the call -- a description of the location being called. Telephone numbers have the following format: NPA-NXX-XXXX. The NPA is the 3-digit code, commonly known as the area code, that occupies the A, B, and C positions in the 10-digit number. The next three numbers -- the D, E, and F of a 10-digit number -- constitute the CO code. Service providers are allocated telephone numbers at the NXX level, on a per RC basis. One or more COs may be a part of the same rate center. RCs have traditionally been associated with the Incumbent Local Exchange Carrier (“ILEC”) serving areas.

Downstream processes supported by each service provider typically effect call rating and call billing. These processes rely upon knowledge of the calling and called party locations to determine if the call is local or toll, and to compute the specific charge for the call. The calling and called party locations are associated with NPA-NXX of the calling and called party numbers and are listed in industry documents maintained by the Traffic Routing Administration (TRA) within Telcordia.

Within the 770/678 NPAs, BellSouth currently has 58 RCs. Many carriers request at least one NXX block consisting of 10,000 in each RC. RCC involves creating larger geographic areas in which individual NXX codes can be used by consolidating or combining existing RCs. With RCC, carriers may require fewer NXX codes to provide service throughout a region, thereby prolonging the life of an area code.

Competitive Local Exchange Carriers (“CLECs”) may provide service using a network infrastructure that varies from the ILEC infrastructure. For example, the area served by one CLEC switch may be larger than the area served by one ILEC switch and may cover many existing RCs. Consequently, a CLEC might provision service with numbering resources from a few NXX blocks - - or even just one NXX block for one or more ILEC RCs, while an ILEC may have multiple NXXs assigned to COs within the same RC. If a CLEC desires to perform call rating and billing identical to the ILEC, then a CLEC will obtain one NXX per RC. In the 678/770 NPAs, if a CLEC requests one NXX block of 10,000 numbers in each of the 58 BellSouth RCs, then the result is that 580,000 telephone numbers have been effectively removed from the pool of available numbers.

The practice of assigning one NXX code per provider, per ILEC RC, per CO, is allowable under the *CO Code (NXX) Assignment Guidelines*. In a competitive marketplace, this assignment practice may create NXX demand greater than necessary to serve customers. This increased demand ultimately results in an accelerated NPA exhaust.

To the extent the number of RCs in an NPA can be reduced, carriers' needs for NXXs may also be reduced. Specifically, a CLEC may only need to obtain three NXX blocks of 10,000 numbers in a consolidated three RC area (a total of 30,000 telephone numbers) versus obtaining twenty NXX blocks of 10,000 numbers (a total of 200,000 numbers) in a non-consolidated twenty RC area. The time required to implement a consolidated RC structure depends upon the complexity of the existing RC structure as well as the number of changes required modifying that structure.

IV. Rate Center Consolidation Methodology

The Industry began its review of RCC in the Atlanta area using the report filed with the Commission by BellSouth on July 15, 1999. That report contained five assumptions for RCC: (1) same local calling area; (2) same local rate; (3) minimal customer impact; (4) ease of customer understanding; and (5) exclude independent telephone companies from analysis.

BellSouth's initial report focused upon Atlanta because of the large extended local calling area, the large number of RCs present in Atlanta, and the increasing demand for NXXs in Atlanta. The Atlanta toll-free calling area includes RCs in the 706 NPA and the 205 NPA in addition to the 404/770/678 NPAs. BellSouth narrowed its consolidation effort to the 404/770/678 NPAs because the entire geographic area served by these area codes could be addressed in RCC. The original proposal called for the 404 area code (Atlanta RC), the 6 independent company RCs in the 404/770/678 NPAs, and the 25 BellSouth RCs on the outer fringe of the 770/678 free calling area to be eliminated from consolidation. Consequently, the remaining 33 BellSouth RCs in the Atlanta metropolitan area would be consolidated into one RC. This would have resulted in 59 BellSouth RCs being consolidated into 27 RCs.

When reviewing the technical and other issues associated with the BellSouth RCC proposal, the industry reached consensus that certain modifications were needed. The issues and resolution are addressed more fully in Section VI. The industry modified the initial proposal to consolidate 27 RCs into 3 RCs. This recommendation, in total, would result in 59 BellSouth RCs being consolidated into 35 RCs. The industry followed the same assumptions in its proposal that were relied upon by BellSouth.

V. Rate Center Consolidation Considerations

1. Technological Impact

RCC requires some upgrades to current technology. In particular, there are some 1AESS switches in the proposed consolidation area. Each 1AESS switch can service 32 NXXs. Larger RCs will increase the risk of code exhaust in the 1AESS switches because telephone numbers could be moved from the former RCs into the larger RC. The larger RC would then serve a larger number of NXXs resulting from the increased number of telephone numbers within one RC. If consolidation were ordered prior to replacement, then the code demand to exhaust relationship would need to be monitored very closely.

2. Billing Impact

Although many wireline and wireless carriers currently offer optional calling plans that are usage, not mileage, sensitive, most traditional toll and expanded local calling rates are mileage sensitive and driven by the mileage between the originating and terminating RCs. When bills are generated for customers using these services, the identifying name of the rate centers is passed “downstream” along with the appropriate mileage information, in order to generate an accurate accounting of each call. If RCs were consolidated (and no modifications were made to current billing systems) the newly identified RC would appear on a customer’s bill as the originating or terminating point of each toll or expanded local call and the mileage used to rate each call would be calculated based on the coordinates of the new RCs. Customer education will be necessary to explain new RC names.

In addition, NPA-NXX codes, once assigned, are entered into a national rating database referred to as the Bellcore Rating Information Database System (“BRIDS”). BRIDS is one of four key databases used by the industry for network routing and rating information. BRIDS is primarily responsible for producing two outputs, the Terminating Point Master and the V&H Coordinate Data. These products are used primarily for billing verification, call rating and send-to billing. Data entries in BRIDS, that are required prior to the activation of each NXX, insure that these functions are performed accurately. These data entries include, but are not limited to, a “Place Name” and a “Rate Center Name.” The Place Name is used to indicate the originating and terminating point of a toll or expanded local call that appears on a customer’s bill; however the Place Name is not used to calculate call rating. Typically, the Place Name and RC Name reference the same exchange name. However, in an RCC environment, it may not be practical to use the same name in these fields since the RC Name would change in many instances and would no longer be associated with exchange names that customers are accustomed to seeing on their bills.

3. Impact on Operational Support Systems (“OSS”)

RCC will cause some changes to OSS. RCC will cause certain modification and manipulation of internal data files, tables, databases and other records containing NPA-NXX information. Each carrier will have to evaluate the modifications for their specific OSS. Human resources will be necessary to perform data changes and update systems to implement RCC. Carriers will incur some level of cost to make the necessary modifications.

4. Local Exchange Routing Guide (“LERG”)

The LERG is the industry reference document for call routing details. The LERG is an output product of an underlying national database called the Routing Database System (“RDBS”). Each NXX is entered into RDBS with an association to one and only one RC. With RCC, the RC associated with every affected NXX must be changed in RDBS. These changes are made on-line for each central office code (NXX) by the

Administrative Operating Company Number (AOCN) designated by the Code Holder of the NXX.

5. Customer notification

The impact of RCC on carriers will vary depending on the above issues and modifications necessary to implement the proposal. All carriers must have sufficient time to implement RCC. Also, it is paramount that carriers have time to perform and provide sufficient testing and customer notification to minimize any adverse impact.

VI. Analysis of Technical Issues

A. Toll-Free Calling

One of the three subcommittees comprised of industry participants addressed the effect of RCC on mandated toll-free calling in Atlanta. Georgia law requires toll-free calling within counties, within a 16-mile radius, and within a 22-mile radius. The toll-free calling subcommittee began its efforts in November 1999.

The subcommittee focused on several key areas. First, the team analyzed the RCs that would be consolidated and reviewed the data compiled by BellSouth showing the mileage between various RCs. The team concluded that there would be no impact to existing intrastate interlata routes based on the design of the consolidated RCs. However, the team determined that there are likely to be some routes that are short toll calls today, which will become longer toll calls (i.e. the rate charged to the customer will move from a lower mileage band to a higher mileage band) as a result of the collapsing of various RCs. This outcome, described as toll dislocation, should only impact customers on basic schedule rates and not those subscribed to optional calling plans.

The subcommittee also discussed possible Vertical and Horizontal Coordinate (“V&H”) options for the new RCs. The subcommittee concluded that the V&H coordinates could be set in a manner that will not interfere with mandated toll-free calling.

In addition, the group discussed possible names of the new RCs. A concern was expressed that billing systems of companies may contain limitations on the number of characters that can be used to identify the RC.

Finally, the team recognized that it will be important to educate customers on the changes that will occur with consolidation, including the new RC name on the bill and the possibility of toll dislocation. The subcommittee determined that all issues relating to the effect of RCC on toll-free calling could be resolved.

The final recommended V&H coordinates for each consolidated RC are as follows:

<u>Rate Center</u>	<u>V coordinate</u>	<u>H coordinate</u>
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ATLANTA NE	7204	2060
ATLANTA NW	7251	2143
ATLANTA SO	7388	2053

B. Rate Center Name Change

The Rate Center Name Change subcommittee initially reviewed the current BRIDS data fields relating to RC names. BRIDS includes entries for a “Place Name” and a “RC Name.” Under the current structure, the Place Name and RC are the same. In BellSouth’s initial report, the possibility of maintaining distinct Place Names and RC names was considered a viable option. This subcommittee determined that it would not be practicable to maintain distinct Place Names and RC names; instead, such a distinction could negatively impact RCC. Instead, this subcommittee recommends that the RC, place name, and locality name will all be updated to one name to implement RCC.

The subcommittee next confirmed that the names of the consolidated RCs must be limited to ten characters to accommodate carriers’ systems limitations. The subcommittee finalized the following names for the consolidated RCs: ATLANTA NE, ATLANTA NW, and ATLANTA SO.

C. E9-1-1 Impacts

This sub-committee reviewed any potential negative impacts to E9-1-1 caused or exacerbated by RCC. This team was also asked to provide an estimate as to how long it would take and the costs that would be associated with implementing RCC (if applicable). The sub-committee’s findings are as follows:

Fact:

RCC, in and of itself should have little or no effect on E9-1-1 call delivery, if certain conditions are maintained.

General Explanation:

Theoretically if all service providers use geographically dispersed end offices that serve a relatively small area there wouldn’t be any E9-1-1 issue. However, the reality is that all service providers do not use, nor should they be required to use, geographically dispersed end offices. Many providers, especially newer providers use their end offices to serve a wide geographic area, one that is technically only restricted by the size of the RC. That wide geographic area is the potential concern RCC poses to E9-1-1 call delivery.

Detailed Explanation:

Currently the default public safety answering point (“PSAP”) assigned to any given incoming trunk group at the E9-1-1 tandem is probably located nearby the PSAP that might actually need to handle a given E9-1-1 call, and they probably interact quite often today.

When the RC is expanded, it widens the area from which a default PSAP may receive E9-1-1 calls, and quite realistically means they could receive an E9-1-1 call from an area that they do not normally interact with today. That means the PSAP loses time while trying to identify where to forward the call. With E9-1-1, time lost may equate to serious results.

Direct impact to default routing:

In the event of an Automatic Number Identification (“ANI”) failure at the E9-1-1 tandem, routing takes place based upon the incoming trunk group, which has a default emergency service number (“ESN”) assignment. That ESN represents the PSAP that would most likely serve the caller based upon the fact that the call was on a given trunk group. Geographic proximity of the callers is assumed, since (traditionally) wire centers are not normally widely dispersed. RCC, particularly on a large scale negates that assumption by allowing a service provider to serve customers anywhere in the RC from a single switch, with common NXX usage throughout the RC.

Indirect impact to default routing:

Whenever an ANI is received but is not found in the E9-1-1 tandem's Selective Routing database (SRDB), the tandem may revert to "default routing", just as if it had received an ANI failure (depends on exact circumstances). While ANI failures are relatively rare (between .02%-1% of all E9-1-1 calls according to one recent National Emergency Numbering Administration (“NENA”) study, and even less in Signaling System 7 supported environments), the situation described above, commonly known as "no record found" happens quite often.

“No record found” results from the delayed entry of the ANI into the SRDB/ALI (“Automatic Location Identification”) database due to order processing errors and other delays that allow a telephone number to have live dial tone before it's entered into the E9-1-1 Automatic Location Identification (“ALI”) databases. This has always been an issue, but with the introduction of things like Local Number Portability (“LNP”) (and its inherent ALI processing delays), Number Pooling (“NP”) and many more new players in the business, it is expected to get worse before it ever gets better. There are plans to improve the provisioning processes, but they are only now being defined. It will most likely be quite some time before any new process is standardized. When added to the ANI failures they make up a larger percent of calls. According to reports cited at the NENA Critical Issues Forum on LNP/NP in Fort Worth Texas, January 7 & 8, 1999, ALI database updates often lag behind dial tone, in many cases by as much as 2-3 weeks.

The impact is compounded by RCC, where the potential to default route to the right PSAP on the first attempt is lost given the expanded RC boundaries. The issue in this instance is the time that may be lost while rerouting the caller to the right PSAP.

The use of Line Class Coding:

In some cases, Public Utility Commissions (“PUCs”) required CLECs use Line Class Codes (“LCC”) for each area they cover and establish multiple trunk groups to the Selective Routing Switch (“SRS”). According to one E9-1-1 architecture planner, this is

not the ideal solution because it results in multiple trunk groups to the SRS and it also causes any new telephone number to be pre-screened to identify which LCC should be assigned for proper E9-1-1 default treatment. This is much the same as trying to use end office screening tables, which some carriers are strongly opposed to because of the labor intensive nature of it, and because of the increased possibility of human error. In other instances PUCs have tried to do the same thing but have rescinded the order as a result of it being considered a barrier to CLECs entering the market. Thus, LCC is not a viable alternative to incoming trunk groups as the determining factor for default routing, although it can work.

Resolution:

The E9-1-1 subcommittee determined that the best solution for addressing these issues is to establish RCs that will allow one PSAP to serve as the Default PSAP, per RC. To make that determination, the subcommittee faced two challenges: (1) establish the size and make-up of the RC; and (2) identify which PSAP might best meet the needs of the communities within each RC as the default PSAP.

These challenges were met utilizing theoretical constructs most often associated with city and regional planning. With the application of these urban planning tools, a group of appropriately sized RCs, each one having a level of “granularity” that meets the default routing needs of the area served, were established. An extension of this planning model provided the framework for the subcommittee to identify which PSAP would best meet the needs of the communities within each RC as the default PSAP.

The urban planning methodology employed in this process is Central Place Theory (“CPT”). CPT is an attempt to explain the spatial arrangement, size, and number of settlements within a given geographic region.⁴ Walter Christaller originally introduced CPT in 1933. Christaller’s background in geography with its focus on the spatial distribution of phenomenon on the earth’s surface, led him to the study of settlement patterns. In the flat landscape of southern Germany, Christaller noticed that towns of a certain size were roughly equidistant. By examining and defining the functions of the settlement structure and the size of the hinterland, Christaller found it possible to model the pattern of settlement locations using geometric shapes (typically triangles and hexagons).

To this day city planners use CPT as a mechanism for understanding the role of the city as a service center. When used as the focus of a region the city becomes a supplier of goods and services to the surrounding countryside. Christaller recognized two inherent facts about cities: (1) people congregate together in cities to exchange commodities and ideas; and (2) cities exist for economic reasons – to facilitate the exchange of goods and services.

However, as the use of these constructs became more prevalent in the study of urban geography it was noted that two cities of equal population do not necessarily

⁴The industry acknowledges and thanks Tom Hinkelman with WinStar for providing the E9-1-1 subcommittee with information regarding CPT.

function as equally important places. Urban geographers came to understand that population size is positively correlated with the importance of a city as a distribution center, but measures such as sales tax receipts, the number of retail and wholesale stores, or employment are more accurate measures of centrality.

The one factor that has had the greatest influence on the distribution of urban settlements is the friction of distance. This concept of friction of distance has helped explain to some extent the distribution of urban places that exist today. One illustration of how distance has contributed to the growth and development of urban places is to evaluate it from the standpoint of commuting.

Prior to the advent of mobile forms of transportation, the most common methods of travel were by foot or horse drawn carriage. This greatly limited the distance one was willing to travel to a town or village for either employment or the exchange of goods and services. Generally, the furthest extent of this commute was limited to a distance that was no more than 30 minutes from the urban center. As technological advancements in transportation increased the commuting distances by reducing the overall travel time, the extent of urban development expanded outward from the original urban core. Travel times have continued to increase with commutes in excess of 45 minutes.

In recent years, however, there has been a shift from the traditional commute to the urban core or central business district (“CBD”) to urban centers on the fringes of metropolitan areas. These new urban centers or “edge cities” have experienced unparalleled growth in the last 20 years. This continued expansion has resulted in once small bedroom communities growing into full-blown urban centers with all the compliments of goods and services found in the traditional CBD. These “edge cities” have increased their zone of influence to draw the residential population for employment and the exchange of goods and services. This drawing power is a direct result in their efforts to reduce the friction of distance.

A corollary to this friction of distance can be transferred to a PSAP zone of influence and degree of interaction with surrounding PSAP agencies. This interaction is translated into common capabilities associated with the same E9-1-1 tandem. These capabilities relate to network transfer, ALI transfer, and the ease of speed dial transfer of voice information. As these “edge cities” grow in both population and employment, the PSAPs experience a reciprocal growth in call volume and interaction with other agencies. This is to ensure that all emergency calls are handled accurately and in the most expeditious manner.

The subcommittee developed and evaluated several different alternatives based on CPT. The final recommendation consolidates 27 RCs into 3 RCs with one default PSAP for each of the 3 new RCs. In the Northeast RC, the subcommittee recommends that Gwinett County serve as the default PSAP. In the Northwest RC, the subcommittee recommends that Cobb County serve as the default PSAP. In the Southern RC, the subcommittee recommends that Clayton County serve as the default PSAP. These PSAPs were selected based on an analysis of the current average default E9-1-1 traffic in

each of the three proposed new rate center areas, as well as current call volumes and PSAP resources. In each case the recommended default PSAP is already receiving more calls and more defaulted calls than any other PSAP in their respective consolidated RC.

Attachment 1 shows the original RCC concept, with thirty-three (33) BellSouth RCs consolidated into one (1) RC.

Attachment 2 shows the final RCC concept, applying CPT, in which twenty-seven (27) BellSouth RCs are consolidated into three (3) RCs.

Attachment 3 illustrates how the geometry applied in CPT relates to an urban hierarchy within a metropolitan region.

The subcommittee recommends that a PSAP in each zone be identified as the designated default PSAP. The proven concepts of CPT indicate that within a multi-county region there exists a zone of influence where one county has a higher degree of interaction among the other counties. This interaction may be a direct effect of the county population, a particular municipality, or its geographic location with respect to the direction of population and employment growth within the region, and other factors.

These factors translate into a level of interaction between PSAP agencies, which is most evident in the fixed transfers and speed dial lists established within the PSAP customer premise equipment (“CPE”). The PSAP agency that most exhibited the level of interaction, and thus the agency with the greatest zone of influence, has been identified as the candidate for the default location.

Using these CPT based guiding principles and since Gwinnett, Cobb and Clayton already handle more calls and more default routed calls (on average) than any other PSAP in their respective RC, the E9-1-1 subcommittee recommends that they be designated as the default PSAP within their RC. In addition, any service provider capable of identifying a caller originated location to a more “granular” level is encouraged to do so. More granularity equates to better accuracy.

The specifics of the RCC plan utilizing CPT, including the existing and consolidated rate centers is as follows:

<u>Existing RCs</u>	<u>Consolidated Atlanta Suburban RC</u>	<u>Counties</u>	<u>Default PSAP</u>
Alpharetta Chamblee Duluth Lawrenceville Lithonia Loganville Norcross Panola Stone Mountain Tucker Roswell	Atlanta Suburban Zone 1 (Northeast RC)	DeKalb Fulton Gwinnett Walton	Gwinnett
Acworth Austell Dallas Douglasville Marietta Powder Springs Smyrna Woodstock	Atlanta Suburban Zone 2 (Northwest RC)	Cherokee Cobb Douglas Paulding	Cobb
Fairburn Fayetteville Griffin Hampton Jonesboro McDonough Palmetto Stockbridge	Atlanta Suburban Zone 3 (Southern RC)	Clayton Fayette Fulton Henry Spaulding	Clayton

In summary, the consensus of the industry is that the proposed Atlanta Suburban rate center would entail three (3) main default PSAP locations.⁵ This would greatly reduce the number and complexity of line class code screen indexing for a local exchange carrier serving the entire RC from a single end office if default routing was established at the county level. The industry also desires to make clear that in order to ensure routing of default calls to the designated default PSAP locations, each company will have to individually review its E9-1-1 trunking, and make any necessary changes during implementation. The industry recommendation will require the use of dedicated incoming trunk groups for each consolidated RC. For example, a company providing

⁵ The industry acknowledges and thanks the counties of Clayton, Cobb, and Gwinnett for agreeing to serve as the default PSAPs to achieve RCC. See Attachment 4, correspondence to PSAPs.

dial tone in any of the three consolidated RCs would need E9-1-1 trunking to the Forest Park and Peachtree 911 tandems with the appropriate default emergency service number for that RC. A minimum of two trunk members per group, with a group for each NPA in use in each distinct consolidated RC is required.

VII. Timeline

The industry recommends that the timeline for implementation of RCC should consider the following items:

- a. Time to develop a detailed implementation schedule
- b. Time to develop any OSS, Billing and Network modifications due to the RCC proposal
- c. Time to complete CO Code Administration changes
- d. Time to complete dialing plan and trunk translations
- e. Time to test
- f. Time to evaluate and complete any E9-1-1 impacts that may need to be addressed
- g. Time to revise tariffs
- h. Time to provide notifications to customers

The impact on carriers for the items listed above will vary depending on the modifications necessary to implement the RCC recommendation. Any implementation schedule should provide sufficient time for the carriers to implement RCC in a timely manner and provide sufficient testing and customer notification to minimize any adverse impact. The industry estimates that it will take approximately twelve (12) months to fully implement RCC from the time the Commission adopts an order establishing the appropriate RCC plan until completion of all RCC activities. The industry will continue to meet during implementation to ensure a smooth transition to RCC and will provide periodic reports to the Commission as requested. The industry will strive to implement RCC as expeditiously as possible.

VIII. Recommendation

The industry recommends that the Commission enter an order adopting RCC in the metropolitan Atlanta area. Specifically, the industry recommends that RCC encompass the 770 and 678 NPAs. In addition, the industry recommends that a total of twenty-seven RCs be consolidated into three RCs. (*See* Attachment 2, map of industry's Atlanta RCC Proposal). This consolidation effort has the support of the companies listed on this report.




The list of the consolidated RCs is reflected *supra*, p. 13. Each new RC would also have one default PSAP, also identified on page 13, as follows:

- Northeast Rate Center Gwinnett County ATLANTA NE
- Northwest Rate Center Cobb County ATLANTA NW
- Southern Rate Center Clayton County ATLANTA SO

The industry respectfully requests that the Commission adopt this RCC proposal as the appropriate solution for the Atlanta area.

Attachment 1

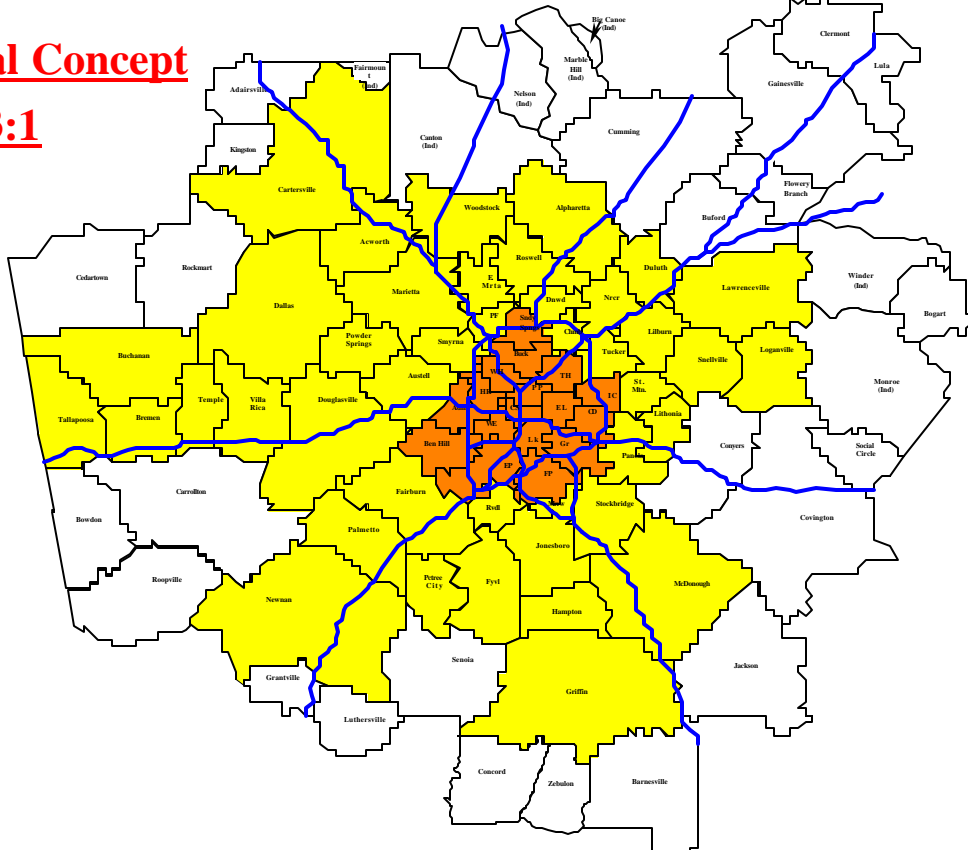
Map of the Original Atlanta RCC Proposal

-  Courtland Rate Center
-  Atlanta Suburban Rate Center
-  Wire Center/Rate Center

ATLANTA 404/678/770
Rate Centers
2000

Original Concept

33:1

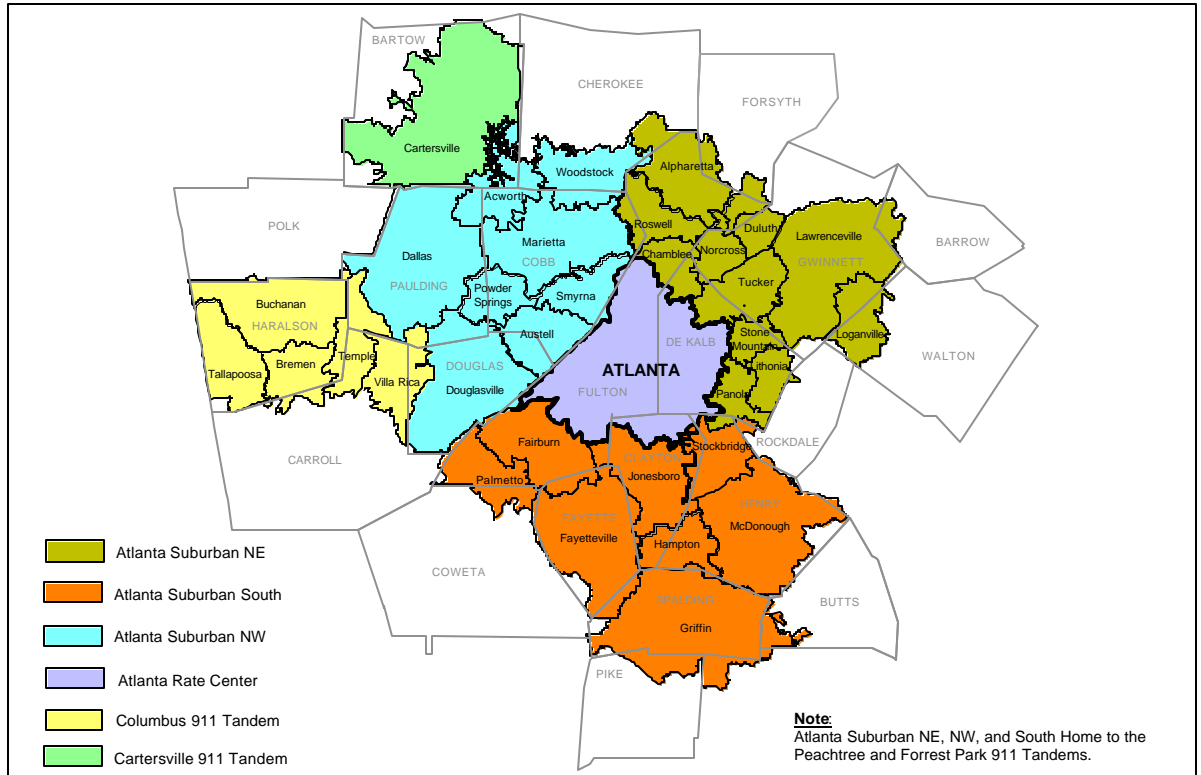


Attachment 2

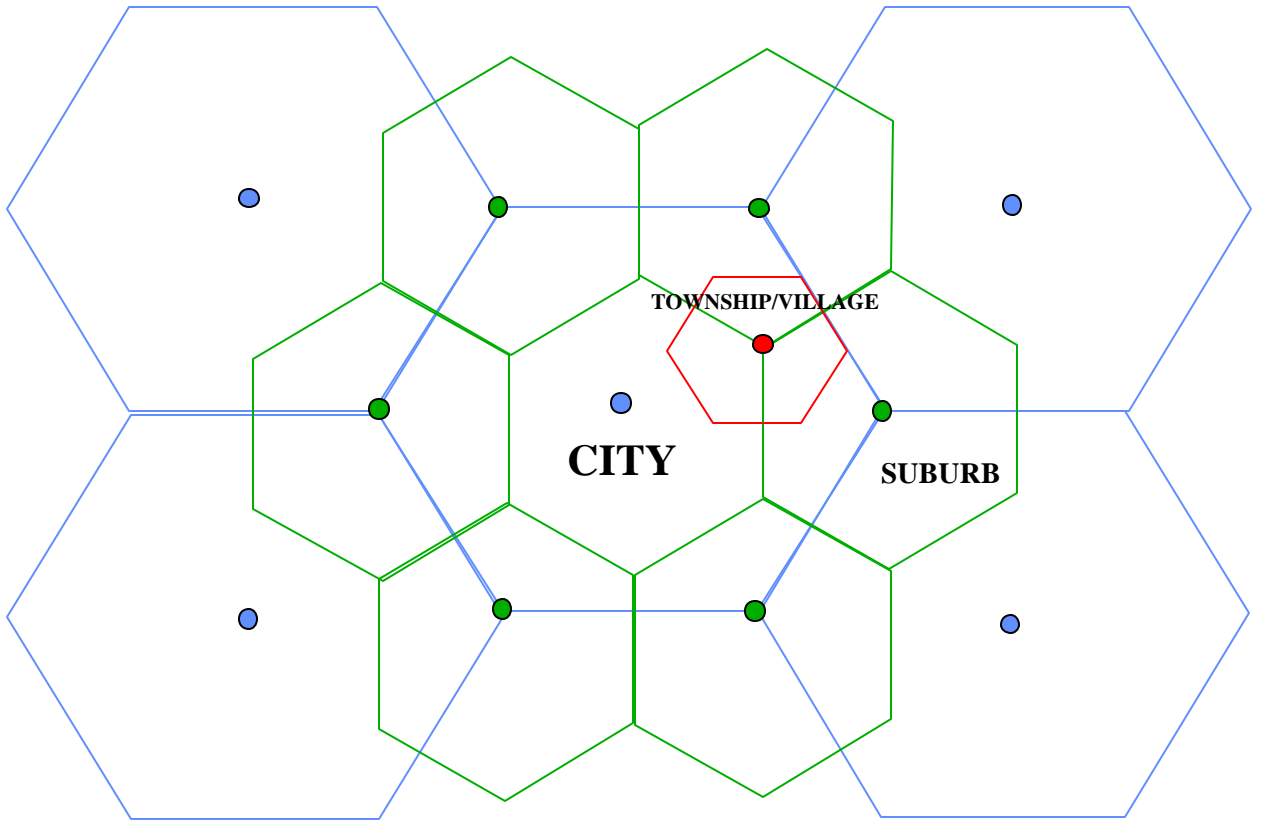
Final Map of the Atlanta RCC Proposal

ATLANTA RATE CENTER CONSOLIDATION
Rate Center to Tandem Boundary

Final Concept Based On CPT 27:3



Attachment 3
An Illustration of CPT



Attachment 4
Correspondence to Default PSAPs

To: Tony Wheeler
140 N Marietta Parkway
Marietta, Georgia 30060

From: Tom Breen-ENP
BellSouth Telecommunications Manager
E9-1-1 Network Architecture Planner

Re: Rate Center Consolidation

Dear Tony

I am writing to thank you for your assistance and participation in the efforts of the telecommunications industry in Georgia to implement rate center consolidation in the Atlanta area. As you are aware, the industry has been working for the past year to prepare a plan that would allow for the consolidation of rate centers without disturbing any E9-1-1 traffic. The telecommunications industry has reached consensus on a plan that consolidates rate centers in three areas, Northwest Atlanta, South Atlanta, and Northeast Atlanta. Each of these three areas will have an associated default PSAP to handle default E9-1-1 traffic.

On behalf of the industry, we deeply appreciate the willingness of Cobb County, to serve as the default PSAP in the Northwest area. Attached is a copy of the existing rate centers that will become part of the consolidated Northwest area. As we finalize our industry report and file it with the Commission, we will acknowledge the participation of *Cobb* County, and will also indicate that you have consented to serve as a default PSAP for your respective area.

Once again, the industry thanks Cobb County for its willingness to assist in number conservation efforts that will ultimately benefit the entire state of Georgia. If you have any additional questions about your role as a default PSAP for your respective area, please let me know. We look forward to working with Cobb County in implementing rate center consolidation in Georgia.

Very truly yours,
Tom Breen

Consolidated Rate Center	Existing Rate Center
North EAST	Alpharetta
North EAST	Chamblee
North EAST	Duluth
North EAST	Lawrenceville
North EAST	Lithonia
North EAST	Loganville
North EAST	Norcross
North EAST	Panola
North EAST	Roswell
North EAST	Stone Mountain
North EAST	Tucker
North WEST	Acworth
North WEST	Austell
North WEST	Dallas
North WEST	Douglasville
North WEST	Marietta
North WEST	Powder Springs
North WEST	Smyrna
North WEST	Woodstock
South	Fairburn
South	Fayetteville
South	Griffin
South	Hampton
South	Jonesboro
South	McDonough
South	Palmento
South	Stockbridge

To: Joey H Keahey
7946 N McDonough Street
Jonesboro, Georgia 30236

From: Tom Breen-ENP
BellSouth Telecommunications Manager
E9-1-1 Network Architecture Planner

Re: Rate Center Consolidation

Dear Joey

I am writing to thank you for your assistance and participation in the efforts of the telecommunications industry in Georgia to implement rate center consolidation in the Atlanta area. As you are aware, the industry has been working for the past year to prepare a plan that would allow for the consolidation of rate centers without disturbing any E9-1-1 traffic. The telecommunications industry has reached consensus on a plan that consolidates rate centers in three areas, Northwest Atlanta, South Atlanta, and Northeast Atlanta. Each of these three areas will have an associated default PSAP to handle default E9-1-1 traffic.

On behalf of the industry, we deeply appreciate the willingness of Clayton County, to serve as the default PSAP in the South area. Attached is a copy of the existing rate centers that will become part of the consolidated South area. As we finalize our industry report and file it with the Commission, we will acknowledge the participation of *Clayton County*, and will also indicate that you have consented to serve as a default PSAP for your respective area.

Once again, the industry thanks Clayton County for its willingness to assist in number conservation efforts that will ultimately benefit the entire state of Georgia. If you have any additional questions about your role as a default PSAP for your respective area, please let me know. We look forward to working with Clayton County in implementing rate center consolidation in Georgia.

Very truly yours,
Tom Breen

Consolidated Rate Center	Existing Rate Center
North EAST	Alpharetta
North EAST	Chamblee
North EAST	Duluth
North EAST	Lawrenceville
North EAST	Lithonia
North EAST	Loganville
North EAST	Norcross
North EAST	Panola
North EAST	Roswell
North EAST	Stone Mountain
North EAST	Tucker
North WEST	Acworth
North WEST	Austell
North WEST	Dallas
North WEST	Douglasville
North WEST	Marietta
North WEST	Powder Springs
North WEST	Smyrna
North WEST	Woodstock
South	Fairburn
South	Fayetteville
South	Griffin
South	Hampton
South	Jonesboro
South	McDonough
South	Palmento
South	Stockbridge

To: Angie Conley
P O Box 602
Lawrenceville, Georgia 30246

From: Tom Breen-ENP
BellSouth Telecommunications Manager
E9-1-1 Network Architecture Planner

Re: Rate Center Consolidation

Dear Angie

I am writing to thank you for your assistance and participation in the efforts of the telecommunications industry in Georgia to implement rate center consolidation in the Atlanta area. As you are aware, the industry has been working for the past year to prepare a plan that would allow for the consolidation of rate centers without disturbing any E9-1-1 traffic. The telecommunications industry has reached consensus on a plan that consolidates rate centers in three areas, Northwest Atlanta, South Atlanta, and Northeast Atlanta. Each of these three areas will have an associated default PSAP to handle default E9-1-1 traffic.

On behalf of the industry, we deeply appreciate the willingness of Gwinnett County, to serve as the default PSAP in the Northeast area. Attached is a copy of the existing rate centers that will become part of the consolidated Northeast area. As we finalize our industry report and file it with the Commission, we will acknowledge the participation of *Gwinnett* County, and will also indicate that you have consented to serve as a default PSAP for your respective area.

Once again, the industry thanks Gwinnett County for its willingness to assist in number conservation efforts that will ultimately benefit the entire state of Georgia. If you have any additional questions about your role as a default PSAP for your respective area, please let me know. We look forward to working with Gwinnett County in implementing rate center consolidation in Georgia.

Very truly yours,
Tom Breen

Consolidated Rate Center	Existing Rate Center
North EAST	Alpharetta
North EAST	Chamblee
North EAST	Duluth
North EAST	Lawrenceville
North EAST	Lithonia
North EAST	Loganville
North EAST	Norcross
North EAST	Panola
North EAST	Roswell
North EAST	Stone Mountain
North EAST	Tucker
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South	Hampton
South	Jonesboro
South	McDonough
South	Palmento
South	Stockbridge