

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

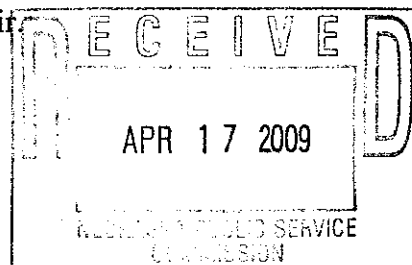
In the Matter of the Nebraska Public Service Commission, on its own motion, to adopt a relief plan for the 402 area code.) Application No. C-4152)) **COMMENTS OF COX NEBRASKA TELCOM, LLC**)

INTRODUCTION

Cox Nebraska Telcom, LLC ("Cox") hereby files these comments for the Public Service Commission's ("Commission's") consideration in Application No. C-4152, as provided in the Commission Order entered March 17, 2009. Cox appreciates the opportunity to provide input on this subject in written format, and it will also be in attendance at the NE PSC Workshop scheduled for April 20, 2009. Cox looks forward to working with the Commission as this docket proceeds and an area code relief plan is created. The more time that is allotted for the industry and the public to implement the recommended relief plan, the easier the transition will be for all involved.

A NEUTRAL OVERLAY IS THE PREFERABLE RELIEF PLAN

Cox recommends the Commission adopt a neutral, overlay relief plan to address the exhaust of the 402 area code as it will cause the least disruption to the public, to large users and telecommunications carriers. All carriers, regardless of being wireless, wireline, incumbent LEC or competitive LEC should be allowed to retain use of 402 through the overlay process. Leaving the 402 area code to reside with one specific type of technology or one specific carrier would be competitively unfair.



Customer notification and education is relatively easy and simple with an overlay because it equally impacts the entire 402 geographic area. Telecommunications carriers and the Commission could jointly collaborate to conduct a widespread educational effort to promote the requirements of 10-digit dialing. However, this concept is hardly new to the public due to the prevalence of 10-digit dialing requirements associated with wireless companies.

The economic expense required to implement an overlay is significantly less for both carriers and customers. Cox would incur minimal work-hours to implement an overlay. Conversely, if an area code split is implemented, Cox's switch vendor's has estimated that the cost would be \$40,000 per switch. The vast difference is because an Automatic Number Identification ("ANI") conversion is required when a split is implemented. Plus, there will be additional costs incurred to update customer information in the billing and care systems.

An overlay is also much less costly for businesses that are invested in their current numbers. Omaha is one of the nations' largest telemarketing hubs. The cost for conversion for these number-heavy businesses could be extensive. New numbers can be allocated to the new area code and over time, 402 will lose numbers through attrition. At some future point, there is a reasonable possibility that a balance will exist between the area codes such that customers can request numbers from either pool.

Cox also recommends the use of an overlay because it would not be affected by the growth or stagnation of either area. The possibility for the greatest growth in the next 20 years is probably in the Omaha metropolitan area. Based on population differences, a split may result in stranding unused numbers in Lincoln while simultaneously leaving

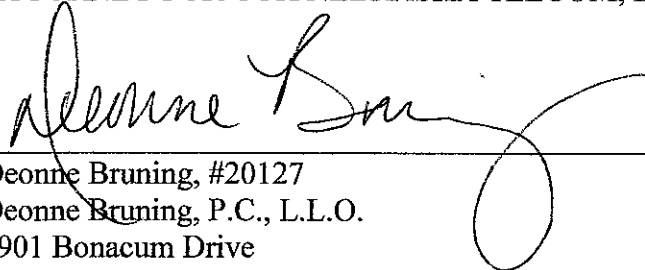
Omaha with the risk that it will again be depleted of numbers thereby requiring further area code relief. Neither outcome is an efficient use of numbering resources.

Finally, since an overlay does not require an ANI conversion, the potential risk to the customer is minimal. Cox has recently completed area code overlays in Orange County, CA and San Diego, CA. There has been no adverse customer impact to date. The only noticeable difference to business-as-usual is a need for customers to be educated on the use of 10 digit dialing.

For all the above-mentioned reasons, Cox encourages the Commission to adopt an overlay as its relief plan for area code 402.

Respectfully submitted this 17th day of April, 2009.

ATTORNEY FOR COX NEBRASKA TELCOM, LLC

A handwritten signature in black ink, appearing to read "Deonne Bruning", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

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