

**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**

**QWEST CORPORATION'S SECOND SET OF COMMENTS**

Qwest Corporation ("QC" or "Qwest") files the following comments in anticipation of the hearing before the Commission on May 27, 2009. These comments outline Qwest's proposals for implementation and scheduling of an area code overlay, assuming the Commission orders an overlay. Qwest does not recommend an area code split and does not recommend a schedule or implementation for an area code split.

1. Qwest recommends an eight month "permissive dialing" period. This will help customers with the change and transition to 10 digit local dialing. Nebraska last experienced area code relief with the introduction of the 308 area code in 1955, so calling habits and patterns are well-ingrained into customers' habits, equipment and systems.

2. An eight-month permissive dialing period will allow a reasonable period for adjustment to the addition of a new area code. During the permissive dialing period both 7 and 10 digit local calls will complete, which allows customers to re-program various forms of equipment with 10 digits. This equipment includes Public Safety Answering Points (PSAP) and devices like auto-dialers, alarm systems, security gates, PBXs, voicemail services, call forwarding settings, life safety systems, speed dialers,

fax machines, internet dial-up modems, and similar functions. In addition, businesses need to make necessary changes in signage, websites, business stationary, directory and advertising listings, and contact information.

3. Assuming the PSC issues an Overlay area code relief Order within the next few months, Qwest proposes the following implementation timeframes:

- a. Start of permissive 10-digit dialing - Saturday 6/26/2010
- b. End of permissive dialing and start of mandatory 10-digit dialing - Saturday 2/26/2011
- c. Earliest new NPA central office code activation date - 3/26/2011

4. On May 7, Qwest sent an email to several other carriers in the industry providing Qwest's initial recommended implementation time frames. Based upon feedback from three of those carriers, Qwest has modified its original proposed time frames, adopting all of the recommended dates, with the exception of the date for the start of the permissive dialing period. Qwest believes it is important to have a minimum 8 month time frame for permissive dialing in Nebraska, as opposed to 6 months.

5. Qwest urges the Commission to adopt this general schedule for implementation of an area code overlay to manage the forecasted exhaust of the 402 area code.

Dated: May 22, 2009

Respectfully submitted,

**QWEST CORPORATION**

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