Attachment A

Summary of Alternatives

Alternative 1 – Geographic split

- 14 rate centers in western portion
- 70 rate centers in eastern & northern portion
- Cities and communities intact
- 22 year projected life for western portion, Area B
- 14 year projected life for eastern portion, Area A
- Adopted by CPUC in 1999

Alternative 2 – Geographic split – western border adjusted easterly slightly in the southwest portion

- 22 rate centers in western portion
- 62 rate centers in eastern & northern portion
- Northern San Diego County & Imperial Valley in same area code
- Cities and communities on both sides of the split lines intact
- Western portion, Area B has projected years of 16 years
- North and eastern portion, Area A has projected life of 19 years

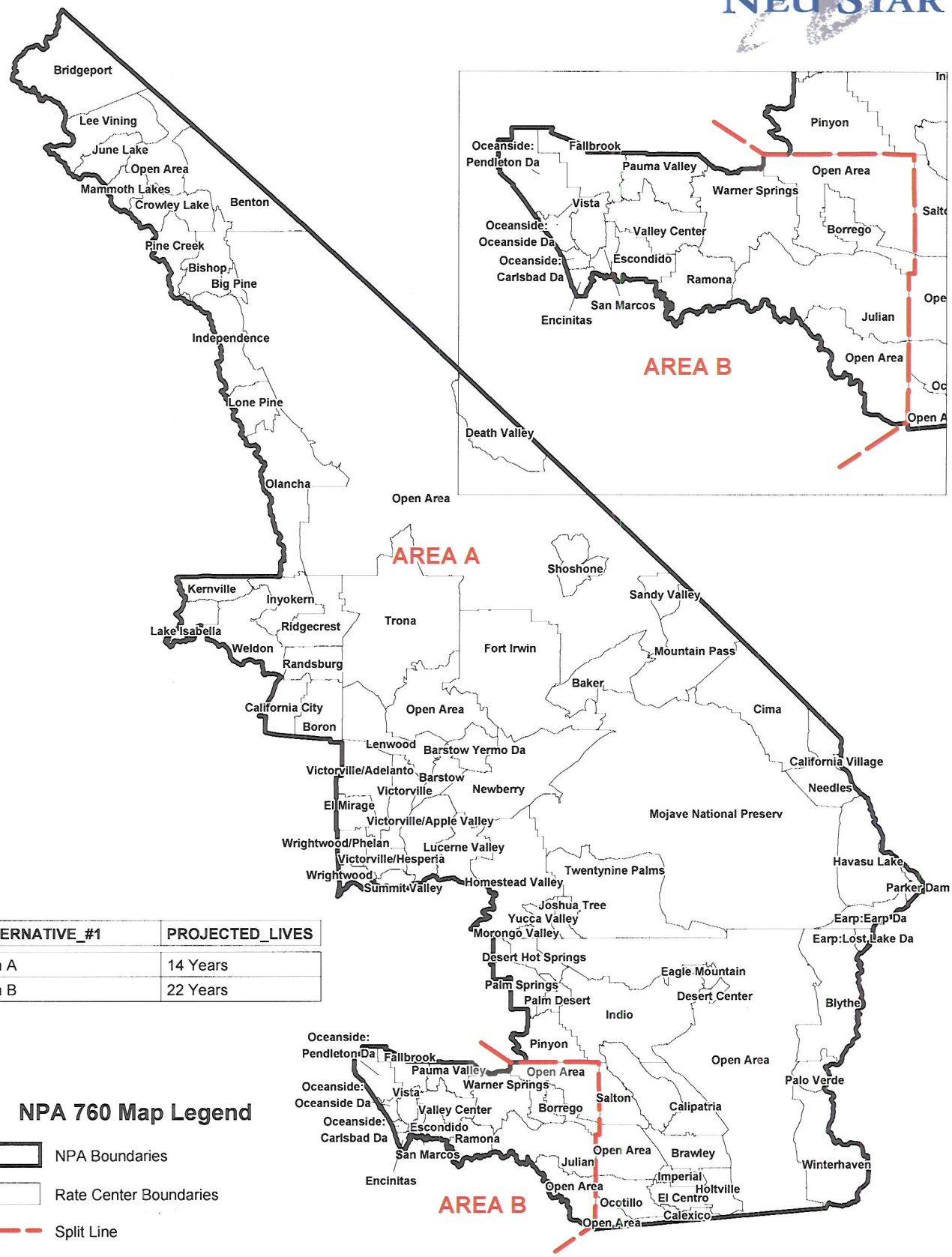
Alternative 3 – all Services Overlay

- Projected life of 17 years.

Alternative 4 - Geographic split

- 21 rate centers in western portion, Area B
- 63 rate centers in eastern and northern portion, Area A
- LATA 732 rate centers in same code
- Northern San Diego County and Imperial Valley in same code
- Cities and Communities intact
- Projected life of western area, Area B 16 years
- Projected life of northern and eastern area, Area A 18 years

NPA 760 Rate Center Map
Split Alternative #1

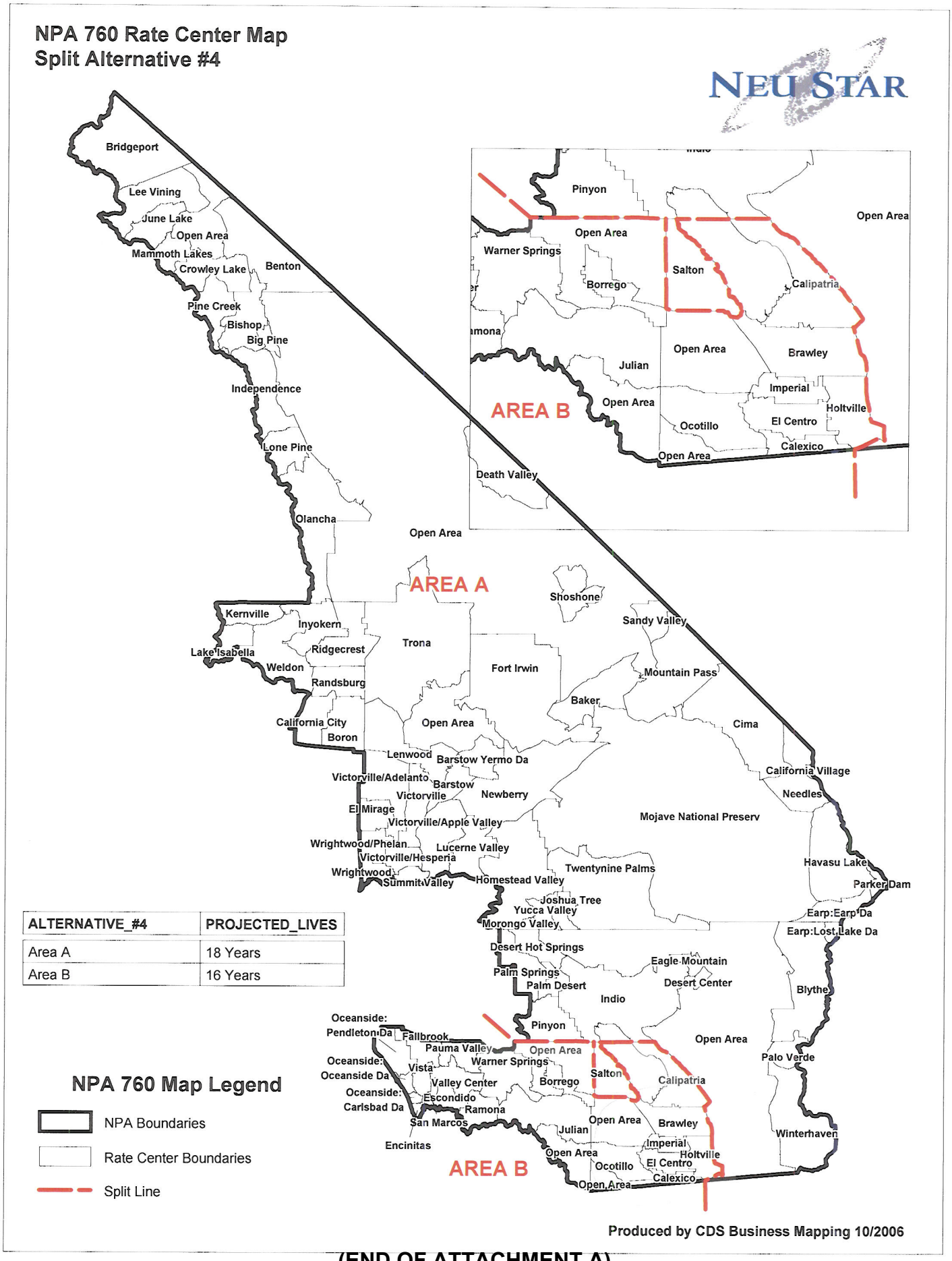


ALTERNATIVE_#1	PROJECTED_LIVES
Area A	14 Years
Area B	22 Years

NPA 760 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

Produced by CDS Business Mapping 09/2006



ALTERNATIVE_#4	PROJECTED_LIVES
Area A	18 Years
Area B	16 Years

(END OF ATTACHMENT A)

Attachment B

Summary of Comments Submitted to the CPUC and from the NANPA Public Participation and Local Jurisdiction Meetings

- Summary of customer opinions including those expressed at the public participation meetings (1300 total)
  - 601 – favoring Alt #1 – split
  - 163 – favoring Alt #4 – split
  - 261 – favoring overlay. Application, p. 7

- 43% favor split alternative #1, 13% favored split alternative #4 and 20% expressed preference for overlay. (3/14/07 Final Meeting Minutes, p. 83-84)

Summary of verbatim comments and points made in support of a specific alternative:

- Many expressed a preference for a split and their own area retaining the 760. In addition to these comments, consumers expressed the following concerns and opinions regarding whether or not a geographic split or an overlay should be implemented.

- There were more than a few expressions of interested in a technology specific code.

- There were several expressions of frustration with the shortsightedness of the whole process.

- Objections were raised to the locations of the meetings – too long a drive from the far reaches of the area, 1/25/07, Ridgecrest, p. 208; 1/26/07, Mammoth Lakes, p. 212.

- There were several expressions of frustration that which area was to retain the 760 was not designated and accusations of government incompetence. "The PUC should remember who they are working for (the people, not the utilities) and not approve his change or any other area code changes." 1/23/07, Vista, p. 194.

Customers also advanced a number of arguments, most in favor of a split, apart from the assumption that they should retain their existing area code:

Arguments in Support of a Split

- **760 is too large for the same area code overall**
  12/27/06, San Marcos, p. 103 "I prefer either of the split alternatives. The overlay saves some confusion during the first year, but leaves a mess forever. In this case the problem is particularly bad since this area code is so large geographically. In addition the north county San Diego portion is so different from the eastern CA section. The split would solve the problem today of Carlsbad and Lee Vining having the same area code." Twenty-one commenters agreed with this point of view.

- **Split provides geographical identification with telephone number**
  2/11/07, Carlsbad, p. 228, ". . . geographical location [is] . . . one of the benefits of having spatially distinct area codes. . ." Four commenters echoed this view.

- **Dislike requirement of more digits, too confusing**
  12/30/06, Palm Desert, p. 104 "I strongly object to the idea of an overlay where consumers would be required to dial the area code for all calls, even calls nearby. As a parent of young children, it is harder for them to learn and remember the number for dialing with the extra digits required. It makes more sense to go with split #1 or #4."
  1/6/2007, Oceanside, ". . . Nobody wants to have to dial 10 numbers for every call! . . "
  1/12/07, Palm Springs, p. 103, " . . . [Overlay] would be much to [sic] to tourists coming into the area."
  1/14/07, Vista, p. 125, ". . .Either way one is likely to have to print new business cards, etc." Thirty-one comments echoed this point of view.

- **Will cost more to call**
  1/12/07, Carlsbad, p. 113, ". . . charged (sometimes) a long distance fee. . ." Five comments expressed this concern.

- **Split alternative has the most lasting effect**
  1/12/07, San Marcos, p. 113, "I would elect Split Alternative #1 in the hopes that it would increase the length of time before the next split/overlay is required. . . ."

1/13/07, Carlsbad, p. 114, ". . . create new ones so that they are good for 25 years or more."
1/22/07, Lee Vining, p. 183, "Mono and Inyo Counties should be given their own area code – this alternative must be considered. Draw the split at the southern boundary of Inyo County. The population is so small here (and growth potential limited) that it would never need to change again. Instead we get lumped into these fast-growing areas to the south and we end up changing our area code every few years. It is ridiculous. Give us one number now and never worry us again." There were at least twenty-four opinions that also expressed this concern.

- **Used to splitting codes**
  1/8/07, Oceanside, p.111, "an overlay would be inconvenient and confusing. Split the area code, as has been the pattern throughout California in the past."
  12/31/06, Escondido, p. 106, ". . .I'm not in business where it would cost a lot to change the area code on documents. Let's go to Area Code 442 as proposed about 10 years ago."

- **Customers unhappy with other overlays**
  1/26/07, Encinitas, p. 212, ". . . My parents now have an overlay and they HATE it! So do my friends who live in the same area. "Five comments echoed this point of view.

- Frontier/Cox supporting split with San Diego retaining 760. Application, p. 9, 10.

- If a split is decided, industry recommends alternative # 4. This alternative has 21 rate centers in western area, 63 rate centers in northern and eastern areas. Application, p. 8.

<u>Argument in Support of an Overlay</u>

- **Wants to keep the same number**
  12/29/06, San Marcos, p.104, "I've had the same number for over 20 years. The overlay seems to be the only way to guarantee no change." Fifteen commenters specifically agreed with this.

- Industry chose overlay option because

  - Quickest to implement
  - Least disruptive to customers. Application p. 5.

- "The industry still recommends the overlay. Therefore NANPA will submit a petition for authority to implement an overlay." (3/14/07 Final Meeting Minutes, p. 84)

(END OF ATTACHMENT B)

Attachment C

Prefixes in 760 Split Alternative #1, Area B, to be changed to 442

NXX	Rate Center
201	VISTA
204	SAN MARCOS
207	VISTA
208	VISTA
210	VISTA
212	VISTA
213	VISTA
214	VISTA
215	ESCONDIDO
216	VISTA
224	VISTA
225	ESCONDIDO
230	ENCINITAS
231	OCEANSIDE: OCEANSIDE
233	ESCONDIDO
236	FALLBROOK
237	OCEANSIDE: PENDLETON
239	RAMONA
260	JULIAN
268	OCEANSIDE: CARLSBAD
270	ESCONDIDO
271	OCEANSIDE: CARLSBAD
274	ENCINITAS
277	OCEANSIDE: OCEANSIDE
283	OCEANSIDE: OCEANSIDE
286	ENCINITAS

NXX	Rate Center
415	VISTA
419	VISTA
420	VISTA
421	OCEANSIDE: OCEANSIDE
429	OCEANSIDE: OCEANSIDE
430	OCEANSIDE: PENDLETON
431	OCEANSIDE: CARLSBAD
432	ESCONDIDO
433	OCEANSIDE: OCEANSIDE
434	OCEANSIDE: OCEANSIDE
435	OCEANSIDE: OCEANSIDE
436	ENCINITAS
438	OCEANSIDE: CARLSBAD
439	OCEANSIDE: OCEANSIDE
440	RAMONA
443	ESCONDIDO
444	OCEANSIDE: CARLSBAD
445	ESCONDIDO
448	OCEANSIDE: CARLSBAD
450	OCEANSIDE: OCEANSIDE
451	FALLBROOK
452	ENCINITAS
453	OCEANSIDE: OCEANSIDE
454	ENCINITAS
456	ENCINITAS
458	OCEANSIDE: OCEANSIDE

NXX	Rate Center
509	VISTA
510	SAN MARCOS
512	OCEANSIDE: PENDLETON
516	ENCINITAS
517	OCEANSIDE: CARLSBAD
518	VISTA
519	VISTA
520	ESCONDIDO
521	OCEANSIDE: OCEANSIDE
522	ESCONDIDO
525	VISTA
526	OCEANSIDE: OCEANSIDE
527	JULIAN
528	ENCINITAS
529	OCEANSIDE: OCEANSIDE
532	ESCONDIDO
533	ESCONDIDO
535	ESCONDIDO
536	VISTA
539	SAN MARCOS
542	VISTA
543	OCEANSIDE: PENDLETON
546	ESCONDIDO
547	OCEANSIDE: OCEANSIDE
551	RAMONA
557	ENCINITAS

Prefixes in 760 Split Alternative #1, Area B, to be changed to 442

NXX	Rate Center
290	SAN MARCOS
291	ESCONDIDO
293	OCEANSIDE: PENDLETON
294	ESCONDIDO
295	VISTA
297	VALLEY CENTER
300	ESCONDIDO
304	SAN MARCOS
305	VISTA
310	VISTA
313	RAMONA
315	RAMONA
317	ESCONDIDO
330	VISTA
331	OCEANSIDE: CARLSBAD
334	ENCINITAS
338	ESCONDIDO
385	OCEANSIDE: PENDLETON
390	VISTA
400	OCEANSIDE: OCEANSIDE
402	ENCINITAS
405	OCEANSIDE: OCEANSIDE
407	VISTA
410	SAN MARCOS
414	VISTA
630	VISTA
631	VISTA
632	ENCINITAS
633	ENCINITAS
634	ENCINITAS
635	ENCINITAS

NXX	Rate Center
465	BORREGO
466	ESCONDIDO
467	ESCONDIDO
468	FALLBROOK
470	VISTA
471	SAN MARCOS
472	OCEANSIDE: PENDLETON
473	OCEANSIDE: CARLSBAD
476	OCEANSIDE: CARLSBAD
477	VISTA
479	ENCINITAS
480	ESCONDIDO
481	SAN MARCOS
484	ESCONDIDO
487	ENCINITAS
489	ESCONDIDO
492	ENCINITAS
494	OCEANSIDE: CARLSBAD
496	OCEANSIDE: CARLSBAD
497	ESCONDIDO
498	ESCONDIDO
500	VISTA
503	OCEANSIDE: OCEANSIDE
504	ESCONDIDO
505	VISTA
715	ESCONDIDO
716	VISTA
717	OCEANSIDE: OCEANSIDE
720	OCEANSIDE: OCEANSIDE
721	OCEANSIDE: OCEANSIDE
722	OCEANSIDE: OCEANSIDE

NXX	Rate Center
558	VISTA
560	VISTA
566	SAN MARCOS
571	SAN MARCOS
575	OCEANSIDE: PENDLETON
576	OCEANSIDE: OCEANSIDE
579	OCEANSIDE: CARLSBAD
580	ESCONDIDO
583	OCEANSIDE: OCEANSIDE
585	OCEANSIDE: CARLSBAD
586	OCEANSIDE: OCEANSIDE
591	SAN MARCOS
593	SAN MARCOS
594	ESCONDIDO
597	VISTA
598	VISTA
599	VISTA
602	OCEANSIDE: CARLSBAD
603	OCEANSIDE: CARLSBAD
607	OCEANSIDE: CARLSBAD
612	ENCINITAS
613	ENCINITAS
615	PAUMA VALLEY
621	SAN MARCOS
622	OCEANSIDE: OCEANSIDE
767	BORREGO
781	ESCONDIDO
782	WARNER SPRINGS
783	ENCINITAS
787	RAMONA
788	RAMONA

Prefixes in 760 Split Alternative #1, Area B, to be changed to 442

NXX	Rate Center
637	OCEANSIDE: OCEANSIDE
638	VALLEY CENTER
639	VISTA
642	ENCINITAS
643	VISTA
644	ESCONDIDO
645	FALLBROOK
649	OCEANSIDE: OCEANSIDE
650	VISTA
651	VALLEY CENTER
652	ENCINITAS
653	SAN MARCOS
654	RAMONA
655	OCEANSIDE: PENDLETON
661	SAN MARCOS
666	VISTA
670	ESCONDIDO
672	OCEANSIDE: OCEANSIDE
675	OCEANSIDE: PENDLETON
682	SAN MARCOS
683	OCEANSIDE: CARLSBAD
685	VISTA
687	OCEANSIDE: OCEANSIDE
688	OCEANSIDE: CARLSBAD
689	FALLBROOK
690	ESCONDIDO
692	OCEANSIDE: CARLSBAD
695	FALLBROOK
696	OCEANSIDE: OCEANSIDE
697	ENCINITAS
703	ESCONDIDO

NXX	Rate Center
723	FALLBROOK
724	VISTA
725	OCEANSIDE: PENDLETON
726	VISTA
727	VISTA
728	FALLBROOK
729	OCEANSIDE: OCEANSIDE
730	OCEANSIDE: OCEANSIDE
731	FALLBROOK
732	VISTA
734	VISTA
735	ESCONDIDO
736	SAN MARCOS
737	ESCONDIDO
738	ESCONDIDO
739	ESCONDIDO
740	ESCONDIDO
741	ESCONDIDO
742	PAUMA VALLEY
743	ESCONDIDO
744	SAN MARCOS
745	ESCONDIDO
746	ESCONDIDO
747	ESCONDIDO
748	BORREGO
749	VALLEY CENTER
750	SAN MARCOS
751	VALLEY CENTER
752	SAN MARCOS
753	ENCINITAS
754	OCEANSIDE: OCEANSIDE

NXX	Rate Center
789	RAMONA
795	OCEANSIDE: CARLSBAD
796	ESCONDIDO
798	SAN MARCOS
801	ESCONDIDO
802	ESCONDIDO
803	ESCONDIDO
804	OCEANSIDE: CARLSBAD
805	OCEANSIDE: OCEANSIDE
806	VISTA
807	ESCONDIDO
809	ENCINITAS
814	OCEANSIDE: CARLSBAD
815	ENCINITAS
818	OCEANSIDE: CARLSBAD
822	VISTA
823	JULIAN
825	RAMONA
826	OCEANSIDE: OCEANSIDE
827	OCEANSIDE: CARLSBAD
828	OCEANSIDE: OCEANSIDE
829	OCEANSIDE: PENDLETON
839	ESCONDIDO
840	ENCINITAS
842	VISTA
845	OCEANSIDE: CARLSBAD
846	ENCINITAS
847	OCEANSIDE: PENDLETON
850	OCEANSIDE: OCEANSIDE
855	ESCONDIDO
857	BORREGO

Prefixes in 760 Split Alternative #1, Area B, to be changed to 442

NXX	Rate Center
704	ENCINITAS
705	ESCONDIDO
707	OCEANSIDE: CARLSBAD
708	ESCONDIDO
710	OCEANSIDE: CARLSBAD
712	OCEANSIDE: OCEANSIDE
714	VISTA
889	OCEANSIDE: CARLSBAD
891	SAN MARCOS
892	WARNER SPRINGS
896	RAMONA
901	OCEANSIDE: OCEANSIDE
907	WARNER SPRINGS
908	OCEANSIDE: OCEANSIDE
913	VALLEY CENTER
916	SAN MARCOS
917	VISTA

NXX	Rate Center
755	ESCONDIDO
757	OCEANSIDE: OCEANSIDE
758	VISTA
759	SAN MARCOS
761	SAN MARCOS
763	OCEANSIDE: PENDLETON
765	JULIAN
918	OCEANSIDE: CARLSBAD
926	VISTA
929	OCEANSIDE: CARLSBAD
930	OCEANSIDE: CARLSBAD
931	OCEANSIDE: CARLSBAD
936	VISTA
940	VISTA
941	VISTA
942	ENCINITAS
943	ENCINITAS

NXX	Rate Center
859	OCEANSIDE: OCEANSIDE
860	JULIAN
870	RAMONA
871	ESCONDIDO
877	ESCONDIDO
884	ESCONDIDO
888	ESCONDIDO
944	ENCINITAS
945	VISTA
966	OCEANSIDE: OCEANSIDE
967	OCEANSIDE: OCEANSIDE
975	ESCONDIDO
978	OCEANSIDE: OCEANSIDE
986	JULIAN
990	FALLBROOK
994	OCEANSIDE: OCEANSIDE

(END OF ATTACHMENT C)