

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**NEUSTAR, INC., IN ITS ROLE  
AS NORTH AMERICAN NUMBERING  
PLAN ADMINISTRATOR**

**PETITION FOR APPROVAL OF  
NUMBERING PLAN AREA RELIEF  
PLAN FOR THE 615 NPA**

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**Docket No. 11-00018**

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**COMMENTS OF  
TW TELECOM OF TENNESSEE, LLC**

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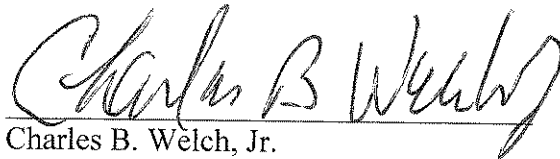
At the Authority's regularly scheduled conference held on August 13, 2013, the Directors their intent to consider alternatives and implement a solution to the imminent exhaustion of the 615 area code in middle Tennessee. At the Authority's invitation to interested parties to provide comments, tw telecom of tennessee,llc ("TWTC") submits the following comments through its undersigned counsel in the instant docket.

It is the position of TWTC that, although it would require a ten digit dialing, an area code overlay is the most preferred solution. Implementation of an overlay will permit current customers to retain existing telephone number, contrary to a geographic split, which would require nearly half of the consumers to change to change numbers. TWTC submits that consumers have become accustomed to ten digit dialing in mobile phone usage and in other popular areas adopting the overlay solution. TWTC contends the overlay alternative would be the least disruptive to the mid-state region.

Respectfully submitted,

FARRIS MATHEWS BOBANGO, PLC

By:



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