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October 14, 2013

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Hon. James M. Allison, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

*In Re: Petition of the North American Numbering Plan Administrator on Behalf of the
Tennessee Telecommunications Industry, TRA Docket No. 11-00018*

Dear Chairman Allison:

The Consumer Advocate recognizes the difficulty in implementing any change in dialing within the 615 area code. Basically, there are two alternatives: (1) split the 615 area code in two; and (2) add an "overlay", which would mean persons in the 615 area would have to dial a 10 digit number.

Given the advances in cell phone technology, many persons now dial by simply pushing a send button. Such calls would be affected very little by an overlay.

In addition, based on our review of filings by NeuStar for the North American Numbering Plan Administrator (attached), it seems that the overlay plan is likely to provide a longer fix than the split.

Accordingly, the Consumer Advocate favors the overlay plan as the least disruptive and most effective solution.

Sincerely,

A handwritten signature in dark ink that reads "Vance L. Broemel".

Vance L. Broemel, Senior Counsel
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