

SERVICE DATE
MAY 10 2000

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Area Code Relief for)	DOCKET NO. UT-991535
the 206, 253, 425 Number Plan Area)	
Filed by NeuStar, for the Washington)	
State Telecommunications Industry)	ORDER IMPLEMENTING AREA
in the Form of an Overlay; and Creation)	CODE RELIEF PLAN
of the 564 Plan Area for All of Western)	
Washington)	
.....)	

BACKGROUND

On February 16, 2000, the North American Numbering Plan Administrator (NANPA), NeuStar, Inc., filed with the Commission the telecommunications industry's final plan to relieve the anticipated shortage of telephone prefixes in the central Puget Sound area, which currently uses area codes 206, 253, and 425. The industry plan recommends that the Commission approve a single all services distributed overlay relief plan for the 206, 253, 425 area codes. Under this plan, customers in the areas encompassed by these area codes would be required to begin dialing the area code and telephone number, i.e., ten-digit dialing, on all local calls beginning on March 16, 2002. The new area code would be put into service about two months later.

By order dated October 13, 1999, the Commission implemented area code relief for area code 360.¹ The area code relief plan approved by the Commission for area code 360 was an overlay of a new area code, 564. Customers in the 360 area code, which encompasses all of western Washington except for the central Puget Sound area, currently are scheduled to begin mandatory 10-digit dialing on February 3, 2001.

The Commission at its March 10, 2000 open meeting adopted a recommendation by Commission staff that the industry be directed to reconsider the central Puget Sound relief plan and consider alternatives in which (1) a single overlay area code is used for all of western Washington or (2) a single overlay area code is used for the entire state.

MEMORANDUM

The Commission has jurisdiction over the implementation of area code relief. FCC rules provide that:

¹*In the Matter of Area Code Relief for the 360 Number Plan Area, Docket No. UT-990219 (October 13, 1999).*

140

State commissions may resolve matters involving the introduction of new area codes within their states. Such matters may include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education and notification efforts regarding area code changes.

47 C.F.R. § 52.19(a).

The Commission agrees with the industry that, compared to the alternative of further splitting any of the central Puget Sound area codes, an overlay is the most practical form of area code relief for the 206/253/425 area. However, the Commission believes that the area code that already has been implemented as the overlay for the 360 area, 564, should be used as a single overlay area code for all of western Washington.

I. The Industry's Implementation Plan Should Be Modified to Use A Single Overlay Code for Western Washington

The Commission concludes that it is in the public interest to use a single overlay for all of western Washington, rather than two overlay codes. The Commission believes that the following considerations support the use of a single overlay code:

- A single overlay code is easier to explain to the public. The industry plans for western Washington will fundamentally change several long-accepted tenets of telephone numbers, namely that (1) the area code does not have to be dialed for local calls, at least local calls to another number in the same area code, (2) any particular geographic area has only one area code, and (3) any particular area code is assigned to only one geographic area. This education process would be difficult under the best of circumstances, and the Commission continues to emphasize that the industry has a responsibility to explain these changes to the public, particularly elementary school children and seniors. To introduce into this mix a further complication of having two new area overlay codes, one of which was following an existing area code boundary and one of which was extending over three existing area codes, would be unnecessarily confusing. By using a single area overlay for all of western Washington, the industry will be able to develop a single, coordinated plan for public education and notification, thereby increasing the likelihood that the pool of available prefixes can be expanded with minimal disruption to the public.

- A single overlay code will postpone, and possibly eliminate the need to use a sixth area code in western Washington. The Commission and the FCC are taking measures to require telecommunications companies to improve the efficiency with which they use telephone numbers. In light of these efforts, it is likely that one new area code will meet the needs of western Washington. If two overlay codes are used, it is possible that one of the codes may prove to be redundant, and there would be no practical way to cancel it.

• There are no meaningful geographic or political distinctions in western Washington that would necessitate more than one overlay. When the 360 area was split from the central Puget Sound area in 1995, there was little to distinguish the two areas. The region's daily economic, social, and educational activities routinely cross the boundary between the 360 area and the area served by 206, 253, and 425. There is no reason to perpetuate the distinction between the two areas by applying separate overlays. Adopting a single overlay will begin the process of erasing the artificial division created only five years ago.

II. The Industry's Recommended Dates for the Implementation of 10-Digit Dialing Should Be Modified

The relief plan filed by NeuStar for the 206/253/425 area recommends that mandatory ten-digit dialing begin on March 16, 2002. The industry recommends that the industry begin its public notification and education efforts on June 16, 2001. However, the Commission believes that the date for mandatory 10-digit dialing should be moved forward to October 20, 2001. Education efforts and the beginning of the permissive ten-digit dialing period should be advanced to match the corresponding dates for the 360 area code.

By moving the date forward, the industry can consolidate its public notification and education efforts for all of western Washington. A customer notification plan encompassing all of western Washington would be more efficient and cost-effective for the industry than if the industry implemented two overlays in the region. With the current implementation dates, this education campaign would begin about six months before mandatory ten-digit dialing is imposed in the 360 area in February, 2001, and continue through the 2001 year. However, the Commission remains hopeful that the industry make progress in its efforts to stretch the remaining life of 360, with the objective of narrowing the window during which different parts of western Washington will convert to mandatory ten-digit dialing.²

A second reason to advance the date for implementation of a new area code in central Puget Sound is to coordinate this effort with the industry's plans to implement area code relief in eastern Washington in early 2002. The industry has advised the Commission staff that it would be better to avoid implementing new area codes on both sides of the state in the same time period. The Commission will alleviate this concern by moving ahead the overlay for the 206/253/425 area.

²The Commission in Docket UT-991627 directed the industry to investigate the potential to consolidate outdated rate center boundaries, which result in wasted telephone prefixes and to prepare for number pooling. The FCC recently adopted telephone number conservation rules that, once effective, authorize the Commission to require that telephone companies return prefixes that are not actually being used to serve customers. [47 C.F.R. § 52.15(i)] If these conservation measures were to make available 42 prefixes for reassignment in area code 360, the 564 implementation date could be postponed until August 2001.

In its relief plan, the industry did not submit a customer education proposal. Instead, the industry has asked for specific guidance from the Commission regarding the scope of the customer education plan. The Commission will monitor implementation of the area code overlay. The industry, in consultation with Commission staff, shall prepare a coordinated customer education plan for the western Washington overlay and submit that plan to the Commission for its approval no later than July 1, 2000.

The Commission also recommends that the number administrator take steps in prefix assignments such that impacts in the rural areas are kept to a minimum. The Commission may request industry representatives and representatives of NeuStar, to bring information and respond to questions at Commission open public meetings during the implementation period.

FINDINGS OF FACT

1. NeuStar, Inc., is the North American Number Plan Administrator and has authority to make recommendations to address number exhaust and area code expansion.
2. NeuStar filed a relief plan on behalf of the Washington state telecommunications industry to address projected exhaust of the 206/253/425 number plan areas.
3. NeuStar filed a plan to overlay a new area code over the existing 206/253/425 number plan areas.
4. NeuStar recommended that the customer notification period for the new overlay begin on June 16, 2001, and that mandatory 10-digit dialing begin on March 16, 2002.
5. The Commission has implemented a relief plan that provides for an overlay for the 360 number plan area. The overlay area code is 564. Mandatory 10-digit dialing is scheduled to begin in the 360 area on February 3, 2001.
6. It is in the public interest that the 564 area code be used as the overlay area code for all of western Washington.
7. A single overlay area code for western Washington will be easier to explain to the public.
8. Use of a single overly code for all of western Washington will postpone and possibly eliminate the need for a sixth area code in western Washington.
9. There is no reason to distinguish the 360 number plan area from the area covered by area codes 206, 253, and 425 such that two overlay codes would be more logical than one overlay code.
10. It is in the public interest, as well as in the interest of the industry, that a

149

single customer notification and education plan be used for all of western Washington.

11. It is in the public interest that mandatory 10-digit dialing for the 206/253/425 number plan areas begin sooner than the industry's recommended date of March 16, 2002. Moving the date forward will permit a single, coordinated customer notification plan for all of western Washington.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction pursuant to RCW 80.36.610, which authorizes the Commission to conduct proceedings and take actions contemplated for action by state commissions under the Telecommunications Act of 1996. That act, as implemented by the Federal Communications Commission, authorizes state commissions to consider an appropriate action on area code relief plans. 47 U.S.C. §251(e)(1); 47 C.F.R. § 52.19(a).

2. The industry area code plan should be accepted, as modified by this Order. The area code plan shall be modified to reflect the implementation of 564 as the overlay code for all of western Washington and to change the schedule for implementing customer notification efforts and mandatory ten-digit dialing.

ORDER

THE COMMISSION ORDERS:

1. The 564 overlay code established for the 360 number plan area shall be the overlay code for all of western Washington.

2. The industry shall prepare a customer notification and education plan for the Commission's approval no later than July 1, 2000. The plan shall provide for customer education and notification throughout all of western Washington, with specific plans for informing and educating elementary students and seniors. The industry shall demonstrate that the plan spending level is sufficient to ensure that members of the public will have the information necessary for appropriate telephone number dialing.

3. Mandatory ten-digit dialing shall begin in the 206/253/425 number plan areas on October 20, 2001. Permissive ten-digit dialing shall begin in the 206/253/425 areas no later than September 2, 2000.

DATED at Olympia, Washington, and effective this 10th day of May, 2000.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



MARILYN SHOWALTER, Chairwoman



WILLIAM R. GILLIS, Commissioner