

SERVICE DATE

SEP - 5 2001

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Implementation of	)	
	)	DOCKET NO. UT-991535
The 564 Overlay Area Code and	)	
Mandatory 10-Digit Dialing in	)	ORDER SUSPENDING
The 206, 253, 360, and 425 Number	)	IMPLEMENTATION OF AREA
Plan Areas in Western Washington	)	CODE RELIEF PLAN
.....	)	

BACKGROUND

1 By order dated October 20, 1999, the Commission implemented area code relief for area code 360.<sup>1</sup> 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 were initially scheduled to begin mandatory 10-digit dialing in August, 2000. By order dated February 23, 2000, the Commission postponed the implementation date for 10-digit until February 1, 2001.

2 On February 16, 2000, the North American Numbering Plan Administrator (NANPA), NeuStar, Inc., filed with the Commission a final plan to relieve the anticipated shortage of telephone numbers in the current 206, 253, and 425 area codes. The Commission on May 10, 2000, approved a modified plan in which the 564 overlay code would be implemented in the 206, 253, and 425 areas and mandatory 10-digit dialing would begin on October 20, 2001.<sup>2</sup>

3 On June 16, 2000, the Commission postponed the area code relief plan for area code 360 until October 20, 2001.<sup>3</sup> The effect of this order was to create a single area code relief plan for all four area codes in western Washington.

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<sup>1</sup>*In the Matter of Area Code Relief for the 360 Number Plan Area*, Docket No. UT-990219 (October 20, 1999).

<sup>2</sup>*In the Matter of Area Code Relief for the 206, 253, 425 Number Plan Area*, Docket No. UT-991535 (May 10, 2000).

<sup>3</sup>*In the Matter of Area Code Relief the 360 Number Plan Area Filed by NeuStar, for the Washington State Telecommunications Industry in the Form of an Overlay; and Creation of the 564 Plan Area for All of Western Washington*, Docket No. UT-990219 (June 16, 2000).

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

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).

**MEMORANDUM**

5 At the Commission's August 22, 2001, open meeting, Staff recommended that the current implementation date for the 564 overlay code in western Washington be suspended for at least a year. Staff said that there has been a significant change in the use of telephone prefixes since the Commission approved the area code overlay date in June 2000. The telecommunications industry is requesting fewer new prefixes and is using its existing supply of prefixes more efficiently. In light of these changes, Staff believes that the scheduled implementation of an area code overlay and mandatory 10-digit dialing in October 2001 is no longer necessary. A delay is feasible without causing significant harm to the telecommunications industry, and it will provide significant benefit to consumers and businesses in western Washington.

6 The Commission also received comments from a representative of an alarm company asking that the October 2001 date be retained. Alarm companies and their customers have incurred costs to upgrade their equipment to perform 10-digit dialing. The companies will incur additional costs if they have to inform customers of the suspension and then later have to notify them of a new implementation date.

7 A telecommunications analyst for a local government agency expressed concern that the Commission not change the area code relief plan itself, such as by changing from an area code overlay to an area code split.

8 No telecommunications company stated a position on whether the Commission should suspend the implementation schedule. A representative of Qwest said the company was relying on Staff's conclusion that the remaining supply of prefixes would be adequate for the period of the delay.

9 The Commission concurs in the recommendation to suspend the area code implementation plan. The Commission has consistently said that it will impose the burden of area code relief on consumers and businesses in Washington only when

doing so is necessary. The recent developments identified by Staff make it possible to delay the burden for at least a year. Moreover, there is a reasonable chance that further improvements in numbering efficiency will be implemented during the coming year and that these improvements will allow for additional delays beyond 2002.

10 The Commission acknowledges and commends the efforts that large customers and the alarm companies have made to prepare for the October 2001 implementation date. Those preparations could appear, in retrospect, to have been unnecessary. However, just as an alarm system itself is useful even if it is never triggered, the efforts to accommodate 10-digit dialing were reasonable and prudent to prepare for possible implementation. It is important to note that the new systems will work even without mandatory 10-digit dialing and that they already be in place if mandatory 10-digit dialing becomes necessary.

**FINDINGS OF FACT**

- 11 (1) The current area code relief plans call for the 564 area code to be implemented in the 206, 253, 360, and 425 areas on October 20, 2001.
- 12 (2) There has been a significant change in the use of telephone prefixes since the Commission approved the area code overlay date in June 2000. The telecommunications industry is requesting fewer new prefixes and is using its existing supply of prefixes more efficiently.
- 13 (3) Implementation of the overlay plan can be delayed until at least October 2002 without placing an undue burden on the telecommunications industry and will benefit telephone customers in western Washington.

**CONCLUSIONS OF LAW**

- 14 (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 establish necessary dates for implementation of area code relief plans. 47 U.S.C. §251(e)(1); 47 C.F.R. § 52.19(a).

**ORDER**


THE COMMISSION ORDERS:

- 15 (1) Implementation of the 564 overlay code and mandatory 10-digit dialing of local calls in area codes 360, 206, 253, and 425 shall be suspended until at least October 1, 2002.
- 16 (2) The Commission Staff shall continue to monitor the use and availability of telephone prefixes in western Washington and shall recommend a new implementation date when it appears that area code relief is necessary, considering the time required for the industry to implement the overlay and the associated public education plan.

DATED at Olympia, Washington, and effective this 28<sup>th</sup> day of August, 2001.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

  
 MARILYN SHOWALTER, Chairwoman

  
 PATRICK J. OSHIE, Commissioner