

June 1, 2015

To: All 206, 253, 360, 425 NPA Code Holders and Other Industry Members (Washington)

Subject: Notes from NPA Relief Option Review Conference Call

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Attached are the notes taken during the May 28, 2015 conference call regarding the overlay options for the western Washington NPAs.

Please feel free to contact me if you have any questions regarding the overlay options, the conference call, or any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on 571-434-5690 or via email at the address above.

Sincerely,

Joseph R. Cocke  
Senior NPA Relief Planner  
NANPA  
E-mail: [joe.cocke@neustar.biz](mailto:joe.cocke@neustar.biz)

C: Rebecca Beaton - UTC Staff

Attachments

**WASHINGTON – 206-253-360-425 NPA  
OVERLAY SCENARIO REVIEW MEETING  
VIA CONFERENCE CALL  
NOTES  
May 28, 2015**

**WELCOME, INTRODUCTIONS & AGENDA REVIEW**

Joe Cocke, Senior NPA Relief Planner–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Joe then reviewed the agenda and NANPA’s roles and responsibilities. Joe stated the notes would be comprised of the items presented and industry input, and that positions could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting, should be emailed to Joe during the conference call to ensure the accuracy of the statement.

**NANPA’s ROLE AND RESPONSIBILITIES**

Joe reviewed NANPA’s role and responsibilities for today’s meeting is to facilitate this meeting by providing the WUTC an opportunity to present two overlay scenarios to the industry for review. The WUTC wishes input and feedback from the industry members on them.

**WUTC STAFF OPENING STATEMENT:**

Rebecca Beaton, of the UTC staff stated: The North American Numbering Plan Administration, (NANPA) notified the Washington Utilities and Transportation (Commission or UTC) that the 360 Numbering Plan Area (NPA) is within 36 months of its forecasted exhaust. This information is based upon April 2015 Exhaust Analysis released by the Federal Communications Commission (FCC). The 360 NPA will exhaust available assignable numbers in the third quarter of 2017.

Today there exists a suspended all services overlay for Western Washington. The last time the UTC addressed Area Code Relief for Western Washington was in Docket UT-991535, dated February 2, 2001. The Area Code Relief plan adopted for exhaust of number resources in area code 360. The Commission determined that one area code would overlay the existing area codes of 206, 253, 425 and 360 NPAs. An overlay NPA requires 10-digit local dialing for all calls. 564 NPA is currently reserved as an overlay code for the western half of Washington State (360, 206, 253, and 425) as conceived by the Commission.

A new area code (564) that will eventually serve the same geographic areas as 206, 253, 425, and 360 has been approved; however, a firm implementation schedule for its introduction has not yet been set. The UTC has kept 7-digit and 10-digit permissive dialing in place since approving the initial 564 area code in 2001. On August 28, 2001, the Commission suspended the order and the North American Number Plan Administrator (NANPA) reserved the 564 NPA for future use in Washington. Neustar issued a “Planning Letter” Number 298 (PL-298) in 2001 when the initial overlay plan

Commission order was suspended, so a follow up PL will reflect the latest UTC order.

The Commission (UTC) Staff must consider whether to recommend to the Commissioners adoption of the existing overlay plan or develop other alternative relief plans before the 360 NPA exhaust. Both the existing overlay plan and any alternative will require additional processes before implementation. If the Commission decides to implement a western Washington overlay, it has flexibility to control the distribution of the 564 NPA numbers such as requiring the use of existing numbers in NPAs 206, 253, or 425 until those NPAs are forecasted to exhaust.

1. The following options Staff is interested in discussing with industry members:
  - a. Overlay the new 564 NPA over the 360 NPA in 2017: forecasted Life: **60 years**
  - b. Overlay 360, 206, 253 & 425 with new 564 NPA in 2017: forecasted Life: **33 years**

**NANPA COMMENTS:**

Joe stated that based on the April 2015 NRUF Forecast, the projected exhaust dates of the western WA NPAs are as follows: 360 NPA in 3Q2017, 206 NPA in 1Q2029, 425 NPA in 1Q2037 and the 253 NPA in 3Q2053.

The purpose of this call is to solicit Industry input on the overlay options and to discuss the impacts of each one. This call is intended as an informal means for the Industry to assist the UTC staff recommendation to the Commission considering relief along with any service provider concerns. No final decisions will be made during this meeting; however meeting notes will be published.

**NPA STATUS**

Joe informed participants that the April 24, 2015, Number Resource Utilization Forecast (“NRUF”) projects the 360 NPA to exhaust during the 3<sup>rd</sup> Quarter 2017. The monthly CO Code demand projection is 1.1 codes/month (13 codes per year).

Joe provided a read-out of the CO Code Summary for the Washington 206-253-360-425 NPAs. He reported as of April 27, 2015 status of the NPAs in the chart below:

NPA	206	253	360	425
Assigned NXXs	616	419	740	515
Unavailable NXXs	19	18	22	20
Available NXXs	165	363	38	265
Total	800	800	800	800
Forecasted Exhaust	1Q2029	3Q2053	3Q2017	1Q2037

## NUMBER POOLING INFORMATION

Cecilia McCabe, Neustar – Number Pooling Implementation Manager, reported the pooling stats in the same NPAs for the period from 6/1/14 to 5/27/15 in the chart below:

NPA	206	253	360	425
Pool start date	11/11/2002	3/24/2003	2/15/2002	5/2/2002
Total RCs	5	10	75	14
Blocks Assigned	127	112	155	135
Blocks Available	50	229	1075	255
Codes Assigned	14	4	5	9
Codes Forecasted	5	5	21	6

The forecasted need is for the next twelve months and includes demand for pool replenishment, dedicated customers and LRNs.

## RELIEF PLANNING and REGULATORY STATUS

Joe provided the following highlights of the historical relief planning and regulatory activities for the western WA NPAs:

March 1999 - NANPA conducted relief planning for the 360 NPA.

September 1999 - NANPA filed results of relief planning with UTC – industry recommendation was an overlay over 360 NPA.

September 1999 – UTC orders 360 overlay, NANPA assigns the new 564 NPA

October 14, 1999 – NANPA conducted 360/564 NPA overlay implementation meeting – permissive dialing to start February 5, 2000 - (See PL-196)

December 1999 NANPA started relief planning for the 206 & 425 NPAs (UTC requested 253 NPA be included in the planning process.

February 10, 2000 - NANPA filed an Industry recommendation to overlay the 206-425-253 NPAs.

March 15, 2000 – UTC established new mandatory dialing date for 360/564 NPA overlay – deferred from July 29, 2000 until not earlier than February 1, 2001.

July 2000 - UTC issued decision UT-990219 to delay implementation of the 360/564 overlay until at least October 2001 and to include 206-253-425 & 360 under the 564 NPA.

July 10, 2000 - NANPA conducted another implementation meeting for the 206-253-360-425/564 overlay; permissive 10-digit dialing for 360 had already started in February, but started on September 1, 2000 for the 206-253-425 NPA. (See PL-239)

On 8/28/01 – UTC decision UT-991535 suspended the overlay implementation (kept permissive 10-d dialing in place). (See PL-298)

**EXPLANATION OF OVERLAY RELIEF SCENARIOS**

All services overlays: a new area code is superimposed over the existing area code. Current customers retain their telephone numbers. Pursuant to FCC rules, ten-digit dialing is required for all local calls.

**Overlay Dialing Plan for Overlays:**

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services	HNPA or FNPA	0+10-digits (0+NPA-NXX-XXXX)

**Overlay Scenario 1.**

Overlay the new 564 NPA over the 360 NPA in 2017: forecasted Life: **60 years**

**Overlay Scenario 2.**

Overlay 360, 206, 253 & 425 with new 564 NPA in 2017: forecasted Life: **33 years**

**Industry Comments:**

Joe & UTC staff sought input and comments from the participants:

Joe captured the following comments regarding the two options:

**CenturyLink:**

Prefers Scenario # 2 – overlay all four NPAs; Concern about the number of customers to be noticed; prefers a 9-month permissive dialing period.

**Verizon:**

Verizon has experienced multiple NPA overlays in the past, believes there would be less customer confusion if entire area went to 10-digit dialing at the same time. In favor of scenario # 2.

**Verizon Wireless:**

Also experienced multiple NPA overlays – would be a simpler message to all of western WA instead of changing 360 NPA first and then coming back later on a piecemeal basis for the other NPAs. In favor of scenario # 2.

**Integra Telecom:**

If each NPA was overlaid separately it would cost more than all at one time. In favor of scenario # 2.

**Sprint:**

Supports the overlay over all 4 NPAs – In favor of scenario # 2.

**Level 3:**

In favor of scenario # 2.

**WITA:**

Representative stated smaller company (Rainier Connect) has numbering in 253 NPA which wouldn't need relief for many years, so it would unnecessarily experience costs associated with the overlay if all 4-NPAs were overlaid.

**IMPLEMENTATION ISSUES**

Joe explained to the participants and the UTC representatives the purposes of the implementation intervals needed for introducing a new area code. The network preparation and customer education period allows the service providers to prepare their switches and network trunking for permissive 10-digit dialing as well as other switching changes and prepare and distribute bill inserts with customer notices of the change in dialing. The permissive dialing period allows the customers to adjust to the dialing change. It provides large business customers (hotels, government centers, airports, etc.) that have PBXs to make the necessary changes to their equipment, allows time for the alarm providers to make the changes to their alarm dialers and providers of other types of security equipment to make the changes. Joe mentioned that due to the large area of four NPAs the industry members should consider the length of time they would recommend for permissive dialing. The period of time may vary depending upon which scenario is ordered by the UTC. In connection with this issue, the INC guidelines state that NANPA should recommend that mandatory dialing start 6-months prior to the forecasted exhaust, therefore mandatory dialing should begin in 1Q2017.

Joe provided an example of a 16-month implementation with a 6-month network preparation and customer education period and a 9-month permissive dialing period and then a 1-month quiet period before the effective date of the new NPA.

Interval Timeframes for 206-253-360-425 NPAs Overlay Scenario 2:

<b>EVENT</b>	<b>PERIOD</b>	<b>DATE</b>
Total Implementation Period	16 Months	-
Start Network Preparation and Customer Education	6 Months	TBD
Permissive 7-digit and 10-digit Dialing Period <i>(Calls within 206-253-360-425 NPAs can be dialed using 7-digits or 10 digits)</i> and Continued Customer Education	9 Months	TBD
Mandatory 10-digit dialing	-	TBD
First Code Activation after end of Permissive dialing period in 206-253-360-425 NPAs.	1 Month	TBD

**OPEN DISCUSSION:**

An industry participant inquired of the UTC about the process going forward if there would be an opportunity for industry members to submit comments on the UTC's draft order. Rebecca Beaton of the UTC staff indicated they would be making a recommendation to the commissioners and once there is a draft decision it will be put out for comments. The UTC has opened up a new docket on this issue: UT-143787.

**MEETING NOTES**

Joe stated the meeting notes resulting from this meeting will be distributed to the industry within two weeks.

Adjourned

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**206-253-360-425 NPA – WASHINGTON  
 Overlay Scenario Review Meeting  
 VIA CONFERENCE CALL  
 MAY 28, 2015  
 PARTICIPANTS**

Attachment 1

<b>NAME</b>	<b>COMPANY</b>
Kyle Bertrand	BroadVox
Frank Vogel	BroadVox
Sarah Wildo	BroadVox
Rita Schmitz	CenturyLink
Deloy Ussery	CenturyLink
Leslie Miklos	Fairpoint
Peggy Fletcher	Fairpoint
Ellen Washbon	Frontier
Jeanne Bell	Integra Telecom
Rick Vitzthum	Kalama Tel
Steve Hanson	Kalama Tel
Scott Seab	Level 3
Joe Cocke	NANPA Relief Planning
Wayne Milby	NANPA Relief Planning
Beth Sprague	NANPA CO Code Administration
Linda Hymans	Neustar Pooling
Cecilia McCabe	Neustar Pooling Implementation
Karen Riepenkroger	Sprint
Shaunna Forshee	Sprint
Kyeva Keith	T-Mobile
Cathie Capita	T-Mobile
Brian Frase	U.S. Cellular
Jena Downs	Verizon
Yun Lee	Verizon
Dana Crandall	Verizon Wireless
Rebecca Beaton	WA UTC
William Weinman	WA UTC
Tim Zawislak	WA UTC
John Cupp	WA UTC
Jennifer Cameron-Rulkowski	WA UTC
Anna Gill	WA UTC
Rob Snyder	Whidbey Tel
Rick Finnigan	WITA