

April 14, 2016

**RE: Docket UT-143787
Commission Staff Proposed Plan for Western Washington 564 Area Code
Overlay**

Based on a November 2015 Number Resource Utilization and Forecast completed by the North American Numbering Plan Administrator (NANPA) and approved by the FCC, Neustar Inc., as the designated NANPA, issued projected exhaust dates for the Western Washington Numbering Plan Areas as follows:

- 360 NPA in 1Q 2019
- 206 NPA in 1Q 2029
- 425 NPA in 4Q 2046
- 253 NPA in 2Q 2059

On March 25, 2016, the NANPA notified the Utilities and Transportation Commission (Commission) that the 360 number plan area (NPA) was within 24 months of its forecasted exhaust, which **NANPA now expects to occur sometime during the first quarter of 2018.**

The “564” NPA is currently being held by the NANPA for a western Washington NPA exhaust relief plan in accordance with the Commission’s order in Docket UT-991535.

Considering this updated information from NANPA, Staff proposes that the Commission order mandatory local ten digit dialing and adopt an “all-services” Overlay for western Washington NPAs with a sequential or “stepped” approach as each NPA nears exhaust. The 564 NPA would first Overlay the 360 area code and then sequentially be applied as an Overlay to the remaining Western Washington area codes as each of them is forecasted to exhaust.

The Western Washington “all-services” Overlay requires customer education and network modifications. Once an order is issued by the Commission, technical and educational implementation measures will be initiated by industry members and Neustar Inc., for completion prior to 360 NPA exhaust.

Overlaying the new NPA 564 across all of western Washington including area codes 360, 206, 253, and 425 sequentially would create the best solution and cause the least disruption for consumers of communications services. A sequential Overlay for western Washington has a NANPA projected life for the 564 NPA of 33 years, assuming current number resource growth rates continue.