Agenda Date: October 23, 2002

Item Number: A6

Docket: UT-991627 – Telephone Number Conservation

Company Name: Telecommunications General

Staff: Rebecca Beaton, Utilities Analyst

Glenn Blackmon, Assistant Director-Telecommunications

Recommendation

Order the telecommunications industry to implement number pooling in all rate centers in area code 509 where local number portability is implemented, by February 1, 2003.

Background

On December 1, 2000, the WUTC ordered all telecommunications companies with prefixes in rate centers serving the 509 area code to implement a thousand-number block pooling trial. The initial phase included rates centers in the Spokane metropolitan statistical area (MSA), which were to begin pooling by July 8, 2001.

The industry subsequently requested a six-month delay in implementation, which the WUTC granted. In May, 2001, the WUTC also granted a limited waiver of pooling requirements to Qwest. The waiver expires on December 31, 2002.

On December 28, 2001, the Federal Communications Commission (FCC), in CC Docket 99-200, issued a national schedule for number pooling. The national schedule included area code 509 in the first group of area codes to be pooled, and number pooling was implemented on January 8, 2002. Moreover, wireless companies will begin FCC-mandated pooling by November 23, 2002.

The WUTC limited the initial pooling requirement to the Spokane MSA to allow the industry to implement number pooling in phases and thereby reduce the burden on companies. At that time Staff recommended that the WUTC address the schedule for pooling in the remainder of area code 509 only if the industry did not voluntarily include it in the initial implementation.

Staff believes that the WUTC should now extend the number pooling requirement to the remainder of area code 509. Number pooling in the Spokane MSA has been successful during the last year, and many companies are now voluntarily pooling in rate centers outside Spokane. Participation varies across the area, however, and even within some rate centers some companies are pooling while others are not. Area code 509 is scheduled to exhaust 4th Quarter of 2006. There are currently 198 codes available (561 codes are assigned and 15 are protected for dialing conflicts) with use forecast at 3.5 per month. Between January 2002 and September 2002, code use was 4.6 codes a month.

Competitive local exchange companies (CLECs) and wireless carriers are moving into the more rural areas of our state and appear to be the bulk of new growth and use of number resources.

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The ability to pool in rate centers as these companies develop a "footprint" in the marketplace will ensure that premature exhaust of area code 509 does not occur.

Staff has consulted with the pooling administrator, NeuStar, and with Qwest, Verizon, Century Tel, and the Washington Independent Telephone Association (WITA) companies operating in eastern Washington. Staff is aware of no opposition to this recommendation. The companies are not required to implement number portability until a competitor requests it. Staff recommends a number pooling implementation date of February 1, 2003, based on industry-standard timelines. Consistent with FCC limitations, Staff recommends that the pooling requirement be limited to rate centers where local number portability is implemented.

Conclusion

Staff believes it is in the public interest to extend mandatory number pooling to include all area code 509 rate centers where local number portability is implemented.