

February 1, 2001

**Cost Allocation of the Consumer Education Plan for 564 Area Code Overlay
Docket No. UT-991535**

**NOTICE OF OPPORTUNITY TO FILE COMMENTS
(February 16, 2001)**

The Washington Utilities and Transportation Commission seeks comments from telecommunications service providers and other interested parties on the most appropriate method of allocating to service providers the costs of public education relating to the introduction of 10-digit dialing and the 564 overlay area code in western Washington.

On November 8, 2000, the Commission adopted the Consumer Education Plan proposed by the telecommunications industry regarding the 564 area code overlay. The approved plan includes, in addition to notice by each company to its own customers, a public education program entailing advertising in print and broadcast media. The amount to be spent on this element of the plan is \$1.2 million.

At the Commission's January 31, 2001, open meeting, the industry public relations committee for the 564 overlay provided an update on the status of the plan and reported that the industry was unable to reach consensus on an appropriate allocation of the \$1.2 million cost.

The Commission intends to consider all comments at an administrative hearing on February 23, 2001. The Commission will issue a separate notice regarding this hearing. Based on the written comments and evidence presented at the hearing as well as the current record, the Commission will issue an order adopting an allocation method and ordering service providers to pay their allocated share of the \$1.2 million. Written comments on the issues to be decided must be submitted by **February 16, 2001**.

The Commission Staff has recommended that the Commission use an allocation method based on the number of telephone number prefixes (NXXs) assigned to each service provider, as reported by the North American Numbering Plan Administrator. Other allocation methods considered by the Staff include working telephone numbers, access lines in service, and revenues. Staff concluded that the number of prefixes method is preferable because it relies on verified, publicly available, non-confidential information, it is readily calculated, and because demand for NXXs (as opposed to demand for telephone numbers) is the most direct cause of the need for area code

relief. The staff recommendation would result in an assessment on each service provider of approximately \$568 per NXX.

A more detailed discussion of Staff's recommendation and a detailed list of the amounts that would be assessed to each service provider can be found on the Commission's web site at this address: <http://wutc.wa.gov/telecom/areacode>. Paper copies will be provided upon request.

A second issue on which the Commission seeks comment is the mechanism for collecting and distributing money for the public education program. The Washington Independent Telephone Association has offered to serve in this capacity. It would receive payments from each service provider in the amount ordered by the Commission, and it would use the funds collected to pay for the advertising costs detailed in the Consumer Education Plan. WITA would maintain and provide for inspection, records of all transactions involving these funds.

The Commission has already approved the education plan itself and the \$1.2 million amount. It is not asking for comments on either the need for an education plan or the amount to be spent on that plan.

The Commission invites comments on the specific questions below. *Commenters are asked to provide specific factual information wherever possible.*

The specific questions for comment are:

1. What method do you recommend for allocating to service providers the \$1.2 million cost of the advertising component of the Consumer Education Plan? Explain how your recommended allocation method meets the following objectives. (If you believe an objective should not be given weight, explain the basis for this position).
 - a. Relationship to the factors causing the need for area code relief.
 - b. Inclusion of all service providers in the allocation method.
 - c. Competitive and technological neutrality.
 - d. Reliance on verified (as opposed to self-reported) data source.
 - e. Reliance on data that is publicly available and not considered to be proprietary or confidential.
 - f. Other objectives.
2. What method do you recommend for the collection and disbursement of the assessments ordered by the Commission?

COMMENTS. All comments are due in the Commission offices no later than **February 16, 2001**. Please include a brief summary of your comments. Provide comments in electronic format via e-mail or on a 3-1/2 inch, IBM-formatted, high density disk, in .pdf Adobe Acrobat format, reflecting the pagination of your original. Please also send us the text in your choice of .doc (Word 97 or later) or .wpd (Wordperfect 6.0 or later), labeled with the docket number of this

proceeding (UT-991535) and the commenter's name and type of software used. If unable to file electronically, commenters are asked, but not required, to file an original plus ten copies of their written comments. Comments may be provided by e-mail to records@wutc.wa.gov. Comments provided by mail or courier should be addressed to: Secretary, Washington Utilities and Transportation Commission, P.O. Box 7250, 1300 S. Evergreen Park Drive S.W., Olympia, WA 98504-7250. Commission Staff will post on the Commission's web site all comments provided in electronic format (with the exception of confidential information). The web site for this proceeding is wutc.wa.gov/telecom/areacode.

The Commission will post and regularly update its web site to include information that pertains to this inquiry. Information will be provided to you individually if you request it. If you wish to receive further information on this issue you may either: (1) submit a written request, call the Commission's records center at (360) 664-1234, or (2) e-mail the commission at records@wutc.wa.gov. When contacting the Commission, please refer to Docket No. UT-991535.

Sincerely,

CAROLE J. WASHBURN
Secretary

NOTICE

If you do not wish to comment at this time, but would like to receive future information about this inquiry, please notify the Commission Secretary by mail, e-mail, or telephone, as indicated above. Please request to be included on the Docket No. UT-991535 mailing list.