

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Conservation of) DOCKET UT-060012
Numbering Resources.)
)
) NOTICE OF OPPORTUNITY TO
) FILE WRITTEN COMMENTS
) **(By January 10, 2007)**
) AND OPPORTUNITY TO MAKE
) ORAL COMMENTS
.....) **(January 24, 2006)**

OVERVIEW

- 1 This docket presents the Utilities and Transportation Commission (“Commission”) the opportunity to consider and, if appropriate, mandate measures to forestall the need to create new area codes within the 360 and 509 area codes. Area codes are also called “Numbering Plan Areas” or “NPAs”.
- 2 This Notice of Opportunity to File Written Comments applies only to the 360 NPA. The Commission will address the issue of mandatory thousand-block pooling for the 509 NPA in the future.

BACKGROUND

- 3 When a telecommunications company offers service to a new customer, it usually needs to offer that customer a telephone number. Historically, telecommunications companies received from the Pooling Administrator¹ a block of 10,000 telephone numbers at a time, which is the maximum number of telephone numbers available under a specific “prefix,” such as “644”-XXXX.

¹ The Pooling Administrator is the entity charged with overseeing the assignment of area codes, three-digit central office codes, and other “numbering resources” throughout the North American Numbering Plan Area (NANPA), which includes Washington. The Pooling Administrator also works with the telecommunications industry in developing area code relief plans. Neustar, Inc. is currently the Pooling Administrator for the NANPA. Neustar, Inc. was selected by the Federal Communications Commission for this role.

- 4 Within an area code or NPA (such as 360 or 509 in Washington) there is a finite number of prefixes. Therefore, while there is a very large number of telephone numbers available within an area code, that number is finite.
- 5 Eventually, the emergence of competition, the development of new technologies and population growth will cause the available telephone numbers within an area code to be used up, and one or more new area codes will need to be created. However, conservation measures are available to forestall the need for creating new area codes.
- 6 One such conservation measure is the implementation of “thousands-block number pooling.” Thousands-block number pooling means each block of 10,000 telephone numbers is broken down into 10 blocks of 1,000 numbers each. These 10 blocks of 1,000 numbers are “pooled,” which means each block of 1,000 telephone numbers is available to different telecommunications companies.² This measure more efficiently utilizes available telephone numbers, and significantly delays the need for new area codes.

JURISDICTION

- 7 Historically, the Federal Communications Commission (FCC) has had exclusive jurisdiction for allocating telephone numbers for telecommunications companies in this state.³ However, on December 6, 2005 the Commission petitioned the FCC to grant it authority to implement mandatory thousands-block number pooling within the 360 and 509 NPAs. The FCC granted the Commission’s petition on November 9, 2006.⁴

² For example, assume a particular telecommunications company needed only 500 new telephone numbers. Without thousands-block number pooling, that company would receive 10,000 numbers, thus “stranding” some 9,500 numbers until the company acquired thousands of new customers, which could take years. By contrast, under thousands-block number pooling, that company would receive a block of 1,000 numbers, and the remaining 9,000 numbers in the original 10,000 number block would be available immediately to customers of other companies.

³ *E.g.*, 47 U.S.C. § 251(e) (FCC is granted authority to administer the portions of the “North American Numbering Plan” that apply to the United States).

⁴ In re Numbering Resource Optimization, Petition for Delegated Authority by the Public Utilities Commission of Ohio, Petition of the New York State Department of Public Service for Mandatory Pooling, Petition of the Washington Utilities and Transportation Commission for Mandatory Number Pooling, the New Mexico Public Regulation Commission’s Petition for Delegated Authority to Implement Additional Number Conservation Measures, CC Docket No. 99-200, DA 06-2299 (November 9, 2006).

- 8 According to the Pooling Administrator, the FCC has already ordered mandatory thousands-block number pooling in 58 rate centers in the 360 NPA.⁵ Number pooling currently is only optional in the other 19 rate centers in the 360 NPA.

RATE CENTERS AND CARRIERS AT ISSUE

- 9 The Commission will consider whether mandatory number pooling should be required for the 19 rate centers in this state for which number pooling is currently only optional. These 19 rate centers at issue are listed in Appendix A. According to the Pooling Administrator, telecommunications companies (carriers) utilizing numbers in those rate centers and who may be interested in this proceeding are listed in Appendix B.

PUBLIC COMMENT

- 10 The Commission issues this notice to interested persons, calling for written comments. At its February 7, 2007, Open Meeting, the Commission plans to consider the comments and address the issues raised in this docket.

- 11 **WRITTEN AND ORAL COMMENTS.** Interested persons may submit written comments to the Commission Secretary no later than **January 10, 2007**, for consideration at the Open Meeting scheduled for February 7, 2007. The Commission will also receive oral comments at its January 24, 2007, Open Meeting. Interested persons may submit comments electronically or delivery to the Commission's secretary at 1300 S. Evergreen Park Drive S.W., P.O. Box 47250, Olympia, Washington, 98504-7250.

- 12 We encourage commenters to discuss any issues that they believe will assist the Commission to meet its goal of conserving numbering resources in the 360 area code. Topics for discussion may include:

- The impacts on small businesses and other businesses caused by area code changes.
- The impacts on consumers caused by area code changes.
- The benefits of number pooling.
- The impacts on telephone carriers from expanded mandatory pooling.

⁵ A "rate center" is a carrier-designated geographic location. Telephone numbers are assigned by rate center. For example, all of a carrier's customers who have telephone numbers with the same prefix (e.g., "664"-XXXX) are in the same rate center.

- Whether the Commission should mandate thousands-block number pooling in order to conserve numbering resources and extend the life of the 360 area code, and if so:
- Whether the Commission should impose any special requirements or permit any exemptions for specific telecommunications companies or under specific circumstances, such as customer needs.

The Commission offers this list to assist interested persons in preparing their comments. The list is not intended to limit the issues that may be addressed in those comments.

13 **Filing Guidelines.** The Commission prefers that comments be provided in electronic format to enhance public access, to reduce the need for paper copies, and to facilitate quotations from the comments. Comments may be submitted via the Commission's Web portal at <www.wutc.wa.gov/e-filing> or by electronic mail to the Commission's Records Center at <records@wutc.wa.gov>. Please include:

- The docket number of this proceeding (UT-060012)
- The commenting party's name
- The title and date of the comment or comments

Please see paragraph 5 below, for format requirements if you submit comments as an attachment.

14 As an alternative, commenters may submit electronic comments on a 3½ inch floppy disk or CD-ROM in both .pdf Portable Document Format (used by Adobe Acrobat) and .doc format (used by Microsoft Word 97 or later and certain other common word-processing applications). Include all of the information requested above. The Commission will post all comments provided in electronic format on the Commission's Web site at www.wutc.wa.gov.

15 The Commission will always accept a paper document. Interested persons who cannot file comments electronically or on a disk may file them on paper.

16 Interested persons who cannot attend the Open Meeting may dial into the Commission's conference bridge line at (360) 664-3846.

17 Questions regarding this proceeding may be addressed to Rebecca Beaton at the above address, (360) 664-1287, or e-mail at rbeaton@wutc.wa.gov.

Dated at Olympia, Washington and effective December 7, 2006.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

A handwritten signature in black ink, reading "Carole J. Washburn". The signature is written in a cursive style with a large initial "C".

CAROLE J. WASHBURN
Executive Secretary

Appendix A Rate Centers in the 360 NPA

NPA	Abbreviated Rate Center	Rate Center Full Name	NPA Complex	FCC Top 100 MSA Name	Pooling Status
360	ABERDEEN	ABERDEEN	360	NA	M
360	AMBOY	AMBOY	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	ASHFORD	ASHFORD	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BATTLEGRND	BATTLE GROUND	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	BELFAIR	BELFAIR	360	NA	M
360	BLACKDIMND	BLACK DIAMOND	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BREMERTON	BREMERTON	360	NA	M
360	BUCKLEY	BUCKLEY	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BUCODA	BUCODA	360	NA	M
360	CAMAS	CAMAS	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	CASTLEROCK	CASTLE ROCK	360	NA	M
360	CATHLAMET	CATHLAMET	360	NA	O
360	CENTRALIA	CENTRALIA	360	NA	M
360	CHEHALIS	CHEHALIS	360	NA	M
360	CHIMACMCTR	CHIMACUM/CENTER	360	NA	O
360	COPALIS	COPALIS	360	NA	M
360	COUGAR	COUGAR	360	NA	O
360	CRYSTAL MT	CRYSTAL MOUNTAIN	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	CURTIS	CURTIS	360	NA	O
360	DEWATO	DEWATO	360	NA	X
360	EATONVILLE	EATONVILLE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	ELMA	ELMA	360	NA	M
360	ENUMCLAW	ENUMCLAW	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	FORKS	FORKS	360	NA	M
360	GRAYHARBCO	GRAYS HARBOR CO	360	NA	M
360	GRAYS RIVER	GRAYS RIVER	360	NA	X
360	HAT ISLAND	HAT ISLAND	360	(Seattle--Bellevue--Everett, WA PMSA)	M
360	HOOD CANAL	HOOD CANAL HOOD	360	NA	M

		CANAL			
360	HOODSPORT	HOODSPORT	360	NA	M
360	KALAMA	KALAMA	360	NA	X
360	KINGSTON	KINGSTON	360	NA	M
360	LA CENTER	LA CENTER	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	LKQUINAULT	LAKE QUINAULT	360	NA	O
360	LONG BEACH	LONG BEACH	360	NA	M
360	LONGVIEW	LONGVIEW	360	NA	M
360	MARYSVILLE	MARYSVILLE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	MONTESANO	MONTESANO	360	NA	O
360	MORTON	MORTON	360	NA	M
360	MOSSYROCK	MOSSYROCK	360	NA	O
360	MT VERNON	MOUNT VERNON	360	NA	M
360	NASELLE	NASELLE	360	NA	X
360	OAK HARBOR	OAK HARBOR	360	(Seattle-Bellevue-Everett, WA PMSA)	M
360	OCOSTA	OCOSTA	360	NA	O
360	OLYMPIA	OLYMPIA	360	NA	M
360	ORTING	ORTING	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	PACIFICBCH	PACIFIC BEACH	360	NA	O
360	PORT ORCH	PORT ORCHARD	360	(Tacoma, WA PMSA)	M
360	PORTLUDLOW	PORT LUDLOW	360	NA	M
360	POULSBO	POULSBO	360	NA	M
360	PT ANGELES	PORT ANGELES	360	NA	M
360	PT ROBERTS	POINT ROBERTS	360	NA	X
360	PTTOWNSEND	PORT TOWNSEND	360	NA	M
360	PUGET IS	PUGET ISLAND	360	NA	O
360	RAINIER	RAINIER	360	NA	M
360	RIDGEFIELD	RIDGEFIELD	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	ROCHESTER	ROCHESTER	360	NA	M
360	SALKUM	SALKUM	360	NA	O
360	SAN JUAN	SAN JUAN	360	NA	M
360	SHELTON	SHELTON	360	NA	M
360	SILVERDALE	SILVERDALE	360	NA	M
360	SKYKOMISH	SKYKOMISH	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	SNOHOMISH	SNOHOMISH	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M

360	SO PRAIRIE	SOUTH PRAIRIE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	SO WHIDBEY	SOUTH WHIDBEY	360	(Seattle--Bellevue--Everett, WA PMSA)	M
360	SOUTH BEND	SOUTH BEND	360	NA	M
360	STEVESPASS	STEVENS PASS	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	TENINO	TENINO	360	NA	M
360	TOLEDO	TOLEDO	360	NA	X
360	UNION	UNION	360	NA	X
360	VADER	VADER	360	NA	O
360	VANCOUVER	VANCOUVER	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	WHATCOMCTY	WHATCOMCTY	360	NA	M
360	WINLOCK	WINLOCK	360	NA	M
360	WOODLAND	WOODLAND	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YACOLT	YACOLT	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YALE	YALE	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YELM	YELM	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M

Legend

M	Mandatory Pooling currently n effect
M	Optional pooling currently in effect
X	Excluded from pooling

Appendix B Carriers

- 1 ADVANCED TELCOM GROUP, INC. – WA
- 2 AIRTOUCH COMMUNICATIONS, INC.
- 3 ARCH WIRELESS HOLDINGS, INC.
- 4 AT&T LOCAL
- 5 BEAVER CREEK TELEPHONE COMPANY – WA
- 6 BLUE LICENSES HOLDING, LLC
- 7 CENTURYTEL OF INTER-ISLAND, INC.
- 8 CENTURYTEL OF WASHINGTON, INC.
- 9 COMCAST PHONE OF WASHINGTON/OREGON, LLC - WA
- 10 COOK TELECOM, INC.
- 11 ELECTRIC LIGHTWAVE, INC. – OREGON
- 12 ELECTRIC LIGHTWAVE, INC. – WASHINGTON
- 13 ESCHELON TELECOM OF WASHINGTON, INC. – WA
- 14 FOCAL COMMUNICATIONS CORPORATION OF WASHINGTON
- 15 GLOBAL CROSSING LOCAL SERVICES, INC.-WA
- 16 HAT ISLAND TELEPHONE CO.
- 17 HOOD CANAL TELCO, INC. DBA HOOD CANAL COMM - WA
- 18 HOOD CANAL TELEPHONE CO.
- 19 INLAND TELEPHONE CO.
- 20 INTEGRA TELECOM OF WASHINGTON, INC. – WA
- 21 INTERNATIONAL TELCOM, LTD. – WA
- 22 KALAMA TELEPHONE CO.
- 23 KMC DATA LLC – OR
- 24 KMC DATA LLC – WA
- 25 LCW WIRELESS, LLC
- 26 LEVEL 3 COMMUNICATIONS, LLC – WA
- 27 LEWIS RIVER TELEPHONE CO., INC.
- 28 LOCAL ACCESS PRIME, LLC – WA
- 29 MASHELL TELECOM, INC.
- 30 MCDANIEL TELEPHONE CO.
- 31 MCIMETRO, ATS, INC.
- 32 MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- WA
- 33 METROCALL
- 34 NEXTEL COMMUNICATIONS, INC.
- 35 NORTH COUNTY COMMUNICATIONS CORP. – OR
- 36 PAC - WEST TELECOMM, INC. – WA
- 37 QWEST CORPORATION
- 38 SBC LONG DISTANCE, LLC DBA AT&T LONG DISTANCE – OR
- 39 SPRINT COMMUNICATIONS COMPANY, L.P. – WA
- 40 SPRINT SPECTRUM L.P.
- 41 TELEPORT COMMUNICATIONS GROUP – SEATTLE
- 42 TELEPORT COMMUNICATIONS GROUP, INC. – OR
- 43 TENINO TELEPHONE CO.
- 44 TIME WARNER OF TELECOM OF WASHINGTON - WAS

- 45 TIME WARNER TELECOM OF OREGON, LLC-OR
- 46 T-MOBILE USA, INC.
- 47 TOLEDO TELEPHONE CO., INC.
- 48 TSS DIGITAL SERVICES, L.C.C. – WA
- 49 UNITED STATES CELLULAR CORP. – WASHINGTON
- 50 UNITED TELEPHONE – NORTHWEST
- 51 VERIZON NORTHWEST INC.
- 52 VERIZON NORTHWEST INC.-OR
- 53 VERIZON NORTHWEST INC.-WA
- 54 VERIZON NORTHWEST INC.-WA (CONTEL)
- 55 WESTERN WAHIAKUM COUNTY TELEPHONE CO.
- 56 WHIDBEY TELEPHONE CO.
- 57 XO OREGON, INC.
- 58 YCOM NETWORKS, INC.