

December 03, 2014

Steven King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

Subject: Docket Number UT-143787

At the request of Rebecca Beaton of the Washington Utilities and Transportation Commission (UTC) staff, and on behalf of Neustar, Inc., the North American Numbering Plan Administrator (NANPA), I hereby notify the UTC that based upon the most recently published area code exhaust projections, the 360 numbering plan area (NPA) is less than 36 months from its forecasted exhaust of third quarter 2017. As such, the UTC should consider moving forward with relief plans to introduce the new relief area code before the 360 NPA is exhausted of central office codes.

On June 16, 2000, the UTC issued an order adopting an overlay as the relief method for the 360 NPA, for which NANPA assigned the 564 NPA. The plan called for the new NPA to extend over the 206, 253 and 425 NPAs as well as the 360 NPA. On August 28, 2001, the UTC issued order UT-991535 suspending the implementation of this overlay while keeping permissive 10-digit dialing in place. In its suspension order, the UTC stated the commission staff shall continue to monitor the use and availability of telephone prefixes in western Washington and the staff shall recommend a new implementation date when it appears that area code relief is necessary. Following the suspension order, NANPA has updated the staff on the availability of prefixes in the 360 NPA. Currently, there are 35 prefix codes available for assignment; as such NANPA projects the 360 NPA to be exhausted of prefix codes by third quarter of 2017. Given the time frames that are necessary for the implementation of relief, including network preparation and customer education, the UTC should consider addressing the suspension order at the present time.

Should the staff issue a recommendation for new implementation dates, the recommendation should take into account the time required for the industry to implement the overlay and the associated public education. Generally, the industry requests 13 months in which to implement NPA relief; six months for network preparation and customer education, followed by 6 months of permissive dialing and one month after the implementation of mandatory 10-digit dialing for the in-service date of the new NPA. This 13 month schedule also provides the industry with time to update their systems to accommodate the new area code. To allow for appropriate implementation intervals, it would be beneficial for the commission to issue an implementation order by or before the fourth quarter of 2015.

Letter to Mr. King
December 3, 2014

Thank you for your attention to this matter.

Respectfully submitted,



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cc: Rebecca Beaton
206, 253, 360 and 425 NPA Code Holders and Interested Industry Members