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May 6, 2016

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket UT-143787
Commission Staff Proposed Western Washington Area Code Plan

Enclosed for filing are comments by the Joint Telecommunications Carriers regarding the above mentioned docket. Please let me know should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cindy J. Manheim". The signature is written in a cursive style and is positioned above a horizontal line.

Cynthia Manheim
Executive Director, Senior Legal Counsel

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Commission Staff Proposed Western)
Washington Area Code Plan;) **Docket UT-143787**
_____)

COMMENTS OF THE JOINT TELECOMMUNICATIONS CARRIERS

The Joint Telecommunications Carriers (“Joint Carriers”)¹ support an all services overlay of the 360, 206, 253, and 425 area code with the 564 area code that has been reserved by the North American Numbering Plan Administration (“NANPA”). The Joint Carriers support Staff’s proposed plan to phase in the use of the 564 area code as an all-services overlay in the existing area codes of 360, 206, 253 and 425, as each of these western Washington area codes nears exhaust. The first area code to be overlaid with the 564 area code is the 360 area code which NANPA predicts will exhaust in the first quarter of 2018.

I. BACKGROUND:

In October 1999, the Washington Utilities and Transportation Commission (“Commission”) approved an all-services overlay of the 360 area code.² NANPA assigned the new 564 Numbering Plan Area (“NPA”) or area code for this overlay. Customers in the 360 area code were initially scheduled to begin mandatory ten-digit dialing in August 2000.

¹ AT&T Corp; Teleport Communications America; SBC Long Distance; Cricket Communications; New Cingular Wireless PCS, LLC; CenturyLink; MCImetro Access Transmission Services, LLC dba Verizon Business Access Transmission Services; Sprint Communications Company L.P.; Virgin Mobile USA, L.P.; Sprint Spectrum L.P; T-Mobile West LLC; and, the Washington Independent Telecommunications Association.

² *In the Matter of Area Code Relief for the 360 Number Plan Area*, Docket No. UT-990219 (October 20, 1999).

However, by order dated February 23, 2000, the Commission postponed the implementation date for mandatory ten-digit dialing to February 1, 2001.

In May 2000, the Commission approved a modified plan in which the 564 overlay code would also be implemented in the 206, 253, and 425 areas and mandatory ten-digit dialing would begin on October 20, 2001 in each of these areas.³ In a subsequent order, the Commission decided it would be best to coordinate the dates for the implementation of the 564 overlay for all four area codes (206, 253, 360 and 425). The Commission decided mandatory ten-digit dialing should begin for all these areas on October 20, 2001 and that permissive ten-digit dialing should be implemented in the 360 area by September 1, 2000.⁴ In September 2001, the Commission suspended implementation of mandatory ten-digit dialing and the 564 overlay and directed Staff to monitor the use and availability of telephone prefixes in western Washington and recommend a new implementation date when necessary. Permissive ten-digit dialing was already implemented at that time and has remained in place.⁵

The Commission has been proactive in maximizing the life of the 360 area code. Those efforts and the implementation of thousands-block number pooling in 2002 have resulted in extending the life of the 360 area code for over 15 years. However, the time has come to implement area code relief for the 360 area code, particularly now that there are only 21 central office codes available for assignment in the 360 area code.

³ *In the Matter of Area Code Relief for the 206, 253, 425 Number Plan Area*, Docket No. UT-991535 (May 10, 2000).

⁴ *In the Matter of Area Code Relief for the 360 Number Plan Area*, Docket No. UT-99021 (June 16, 2000).

⁵ *In the Matter of Area Code Relief for the 206, 253, 425 Number Plan Area*, Docket No. UT-991535 (May 10, 2000).

II. Joint Carriers Support Staff's Proposal

Staff has proposed the implementation of mandatory local ten-digit dialing and an “all-services” overlay for western Washington NPAs (360, 206, 253 and 425) with a sequential or “stepped” approach as each NPA nears exhaust.

A. An All-Services Overlay is the Best and Most Equitable Approach

The Joint Carriers agree that an all-services overlay is the best and most equitable approach. In Docket No. UT-991535, the Commission concluded that it is in the public interest to use a single overlay for all of western Washington.⁶ Nothing has occurred in the intervening years to suggest that the Commission should change its previous conclusion.

An overlay will significantly minimize inconvenience to consumers and is consistent with the trend throughout the United States to use an all-services overlay as the preferred form of area code relief. There are numerous benefits to utilizing an overlay for area code relief. An overlay means no customers have to change the area code of their existing telephone number, and they do not need to contact family, friends and business associates to provide them with a new telephone number. Further, businesses do not have to incur the expense of changing marketing materials, such as signage, websites, and stationery. In addition, there will be no impact on non-telephone company databases that use telephone numbers as identifiers for customers, such as airlines, pharmacies, National Missing Children, and so forth.

⁶ *In the Matter of Area Code Relief for the 206, 253, 425 Number Plan Area*, Docket No. UT-991535 (May 10, 2000), p. 2.

Overlays have been widely adopted across the United States as the preferable form of area code relief. In the last ten years thirty-nine (39) overlays have been ordered by state commissions.⁷

Although an all-services overlay requires the implementation of ten-digit dialing,⁸ many customers already dial ten-digits for local calls today as part of their routine calling pattern. Many consumers work in one area code, live in another and have friends and family in numerous other area codes. Moreover, many customers today are already familiar with ten-digit dialing due to the proliferation of wireless communications⁹ where ten-digit dialing is the common practice. In many situations customers no longer “dial” a number, but instead simply highlight a name in a contact list to select the number to be “dialed”.

Recently, the Idaho Public Utilities Commission (“Idaho Commission”) selected an all-services overlay as the method of relief for Idaho’s 208 area code, recognizing that with new technologies such as all Internet Protocol (“IP”) networks and Voice over Internet Protocol (“VoIP”), telephone services are increasingly utilizing ten-digit dialing. The Idaho Commission also noted that, “the vast majority of phone number dialing is now done automatically by cellular phones, digital devices, and computers, alleviating the need to

⁷ See “Area Codes Introduced Over the Last Ten Years” report located at <https://www.nationalnanpa.com/enas/npasOverLast10YearsReport.do> (last viewed on May 3, 2016).

⁸ 47 CFR 52.19(c)(3)(ii) (“No area code overlay may be implemented unless there exists, at the time of implementation, mandatory ten-digit dialing for every telephone call within and between all area codes in the geographic area covered by the overlay area code.”)

⁹ In Washington 48.3 percent of households are wireless-only and 16.7 percent are wireless mostly. In fact, only 5.5% of households are landline only. CDC, National Health Interview Survey. *Wireless Substitution: State-level Estimates From the National Health Interview Survey, 2014* (Released February, 2016) http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless_state_201602.pdf (last viewed May 5, 2016).

remember numbers.¹⁰ The Idaho Commission saw those trends continuing, and the Commission can expect the same trends to continue in Washington as well.

In summary, an all-services overlay is the best and most equitable form of area code relief because no customer has to change his or her existing telephone number and the requisite ten-digit dialing is of little concern to customers today.

B. Implementing the Overlay in a Phased Approach Is Sensible

Although the Commission previously ordered the 564 overlay of the 206, 253, 360 and 425 area codes to occur at the same time, the Joint Carriers agree with Staff that it is appropriate at this time to implement the 564 overlay in a sequential or “stepped” approach as each NPA nears exhaust, particularly given the large difference in the projected exhaust dates for the various areas codes in western Washington. The stepped approach would allow mandatory ten-digit dialing to be implemented in the area currently covered by the 360 area code, and then it would be required in other NPAs when each approach exhaust. As previously stated, the 360 area code is projected to exhaust in the first quarter of 2018. The next area code to exhaust (206), is not projected to do so for another decade. The 253 area code is the last of the western Washington NPAs projected to exhaust, but not for another forty years.

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¹⁰ In the Matter of the Application of Neustar, Inc. for Approval of NPA Relief Plan for the 208 Area Code, Idaho Public Utility Commission Case No. GNR-T-15-06, Order No. 33414, p. 6 (Nov. 2, 2015).

III. Implementation Timeline

A. General:

Although permissive seven- or ten-digit dialing has been in place for more than fifteen (15) years in the 360 area code, it is likely that many consumers are unaware, and carriers that have entered the market in the last fifteen years may also be unaware as well. In an overlay implementation, the permissive dialing period allows customers to begin dialing calls with ten digits on a voluntary basis in order to become accustomed to this method of dialing before it becomes mandatory. The permissive ten-digit dialing period also allows customers to modify their on-premises communications equipment and automatic dialers for ten-digit dialing well before the mandatory ten-digit dialing date. Permissive ten-digit dialing is also helpful to alarm companies as it allows them time to modify alarm dialers on customer premises to dial ten-digits. While some of this work may have already been done in preparation for the planned overlay of the 564 area code in 2000, so much time has passed that the Joint Carriers recommend an implementation approach that does not presume that consumers or new entrants are aware that permissive seven- or ten-digit dialing is already in place.

Assuming the Commission adopts an all-services overlay, the Joint Carriers recommend a 13-month implementation schedule. This is consistent with the implementation period that the industry has recommended, and many states have adopted, for implementation of an area code overlay. A 13-month implementation schedule allows the first six months to be dedicated to customer education and network preparation, followed by six months of permissive seven- and ten-digit dialing along with continued customer education, and then one month of mandatory ten-digit dialing before the first central office

code activation from the 564 overlay would become effective. The Joint Carriers note that the conversion to mandatory ten-digit dialing occur on a weekend, avoiding any weekends that may experience heavier than normal calling, such as Mother’s Day.

B. Proposed Implementation Schedule for Overlay of the 360 Area Code

As NANPA projects exhaust of the 360 area code in first quarter 2018, the Joint Carriers recommend the schedule set forth below for implementation of the 564 overlay of the 360 area to ensure that area code relief is implanted with sufficient time in advance of the projected exhaust date.¹¹ These proposed dates also do not conflict with any other known area code implementations. In order to accommodate the proposed schedule and allow for an orderly implementation prior to the exhaust of the 360 NPA, the Joint Carriers respectfully request that the Commission issue an order as soon as possible adopting this schedule:

| | | |
|--|--|------------------|
| Start of customer education and network preparation period | 6 months | July 28, 2016 |
| Start of permissive 7- or 10-digit customer dialing period | 6 months | January 28, 2017 |
| Start of mandatory 10-digit dialing | -- | July 29, 2017 |
| Effective date of 564 NPA | 1 month after start mandatory 10-digit dialing | August 28, 2017 |

IV. Customer Education

Joint Carriers are committed to educating customers about the implementation of the new 564 overlay. As stated in Staff’s recommendation, once an order is issued by the

¹¹ The NPA Code Relief Planning and Notification Guidelines in Section 5.1 recommend that mandatory dialing dates for an overlay be at least six months prior to the projected exhaust date. See <https://www.atis.org/docstore/product.aspx?id=27888>.

Commission, educational measures will be initiated by industry members and Neustar Inc. Specifically, industry members will work together, as has been done in other states, to perform educational outreach through customer notices, press releases and company websites.

V. Conclusion:

The Joint Carriers request that the Commission expeditiously issue an order adopting Staff's proposal to phase in the use of the 564 overlay area code in existing western Washington NPA (360, 206, 253 and 425) as each code nears exhaust, and to introduce mandatory ten-digit dialing in that same phased-in approach. The Joint Carriers request that the Commission adopt the implementation schedule proposed herein for the overlay of the 360 area code.

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Submitted this 6th day of May, 2016.

AT&T

/s/ Cynthia Manheim

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