

January 10, 2007

VIA E-MAIL AND FIRST CLASS MAIL

Carole Washburn
Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: *In the Matter of the Conservation of Numbering Resources*
Docket UT-060012

Dear Ms. Washburn:

The Public Counsel Section of the Washington Attorney General's Office (Public Counsel) respectfully submits these comments in response to the December 7, 2006 Notice of Opportunity to File Written Comments in the above-captioned matter.

Public Counsel strongly supports aggressive efforts to forestall the need to create new Numbering Plan Areas (NPA). Number pooling is a regulatory success story. Past introduction of new area codes in order to stem telephone number depletion was not responsive to consumer's needs. NPA changes create inconveniences and additional costs for consumers and the telecommunications industry alike—and prior to number pooling were especially problematic in light of the fact that NPAs were frequently added even when a large quantity of numbers remained unused.

Each NPA has approximately eight million assignable numbers, and there are nearly seven hundred assignable NPA codes, thus, the entire North American Numbering Plan (NANP) consists of nearly 5.5 billion possible unduplicated ten-digit numbers. Yet, as recently as 1999, the administrator of the NANP projected that the NANP could deplete as soon as 2007. Measures such as thousands-blocks number pooling have already successfully delayed what only a few years ago was an alarming crisis. Thus, it is in the best interest of consumers, both in Washington and throughout the NANP, that the WUTC responsibly manage the state's available number resources in order to avoid unnecessary expansion. Extending the number pooling provisions to

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all rate centers in the 360 NPA will promote greater efficiency in the system and increase utilization rates of assigned numbers.

In the short run, and on a regional level, these measures will prevent unnecessary and burdensome costs for businesses and consumers in the 360 NPA. As an investment in the future, these procedures will also contribute to the longevity of the entire NANP under its current structure. Estimates for adding one or more digits to the current ten-digit dialing scheme predict that the change could cost society from \$50 to \$150 billion. Therefore, Public Counsel believes every effort should be made to exhaust all possible options to prevent the need for new NPAs.

Thank you for this opportunity to comment. Public Counsel will attend the Commission's January 24, 2007 open meeting and will be available for further comment.

Sincerely,

Stefanie Johnson
Regulatory Analyst
Public Counsel Section