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To: [UTC DL Records Center](#)
Cc: [Beaton, Rebecca \(UTC\)](#)
Subject: UT-143787 - Area code relief - public comment
Date: Friday, May 06, 2016 5:01:20 PM

Mr. Steve King, Secretary
Washington Utilities and Transportation Commission
Olympia, WA

Dear Mr. King:

Thank you for the opportunity to comment on staff's proposed area code relief plan.

I first want to commend the Commission for its decision in 2001 to stop the telecommunications industry's plan to impose 10-digit dialing in western Washington. This is, admittedly, a self-serving act of congratulations, given my role at the Commission at that time. However, the Commission made the decision that the industry could do a much better job than it had at using numbering resources efficiently. As a result of that decision the consumers and businesses of western Washington avoided for at least 15 years an unnecessary complication to their use of the telephone.

My second point is to observe that those complications from 10-digit dialing have diminished significantly since 2001. Our phones have become much smarter, and many of us call a name instead of a number. Moreover, with the portability of mobile phones, it is now quite common to have nearby friends and colleagues with different area codes. We don't "dial" so much as we did in 2001, and when we do we often need to dial 10 digits already.

Given the reduced burden of 10-digit dialing, I believe it is reasonable to move ahead with the area code overlay as staff has proposed. There is still plenty of improvement that the industry could make to its use of numbering resources, particularly through the expansion of local calling areas and the consolidation of rate centers. However, those improvements are not likely to happen.

Finally, the Commission should clarify one point about the staff's proposed area code relief plan, which is when the 10-digit dialing requirement will be applied to customers in the 206, 253, and 425 area codes. The plan says that the 564 prefixes will be assigned there only when the existing prefixes are no longer available, but it is not clear to me when 10-digit dialing would become mandatory.

In making this clarification, the Commission should require mandatory 10-digit dialing for all western Washington areas at the same time. My understanding of the Commission's decisions in 2000 and 2001 was that all of western Washington would be governed by a single set of requirements. This will simplify the customer education process and avoid the need for multiple rounds of publicity.

Thank you for considering these comments.

Sincerely,
Glenn Blackmon
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