

("Roger D Maxwell") Roger.Maxwell@centurytel.com on 10/13/99 10:53:00 AM

To: dgriffith@wutc.wa.gov, Glenn Blackmon/WUTC@WUTC
cc: sandy.nelson@centurytel.com, Bob.Graybeal@centurytel.com,
Dave.Bennett@centurytel.com, Gary.Ring@centurytel.com,
Randy.Olsen@centurytel.com, Sandy.Nelson@centurytel.com,
Scott.Sawyer@centurytel.com
Subject: Docket No. UR-990219

Comments on "Potential petition to the Federal Communications Commission for Waiver of the Mandatory 10-Digit Dialing Rule to Permit 7-Digit Dialing Within the "360"/"564" Area Code Overlay Area"
Docket No. UR-990219

The assumption "the numbering administrator could assign prefixes from the 360 and 564 area codes such that no local calling area has the same prefix twice" requires that administrator to build a matrix of all Rate Centers and their local calling areas.

1. Would this additional work require funding, and if so, by whom?
2. How will the administrator be updated of any changes to local calling areas?
3. If an area expands its local calling area and it creates a conflict, which course of action will be taken?
 - A. Change the NXX of one area to resolve conflict. (number change for customers)
 - B. Make customers dial 10-digits for conflicted NXX codes only.
 - C. Make customers in conflicted area dial 10-digits for all local calls.
 - D. Open discussions for requiring all customers in 360/564 to dial 10-digits for local calls.

As indicated the customers in Yelm(360) can call to Tacoma(253) with 7-digits. Will this require the following?

1. Number administrator to expand their local calling matrix for all area codes .
2. Do existing areas within the 360 area code dialing into 206/253/425 for local calls revert back to allow 7-digit calling for local calls? IE Bremerton to Gig Harbor.

Is it true that "All members of the industry group that developed the 360/564 overlay plan would support, or at least not object to, a petition to the FCC for a waiver that would allow the permissive 10-digit dialing arrangement described above"?

This assumes that this document or a predecessor has been available for the all members to support.

I am old enough to remember the 4 and 5 digit local calling and the arguments at that time when customers where required to dial 7 digits. The same arguments are present and customer education did prevail.

It is inevitable that within a short time that 10-digit dialing would be required nationally as more areas are converted with overlay relief.

"The opinions expressed herein are my personal opinion and are not necessarily those of my employer."