

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Implementation of the
564 Numbering Plan Area

DOCKET UT-143787

ORDER 01

ORDER ADOPTING
IMPLEMENTATION PLAN

BACKGROUND

- 1 The North American Numbering Plan Administration (NANPA) administers and assigns to telecommunications companies the available blocks of telephone numbers known as Central Office Codes in each Numbering Plan Area (NPA or area code). These companies, in turn, assign telephone numbers from within these codes to their customers.
- 2 On May 10, 2000, the Washington Utilities and Transportation Commission (Commission) entered Order Implementing Area Code Relief Plan in Docket UT-991535 (May 2000 Order) in which the Commission initially approved a plan to add a new NPA to remedy the anticipated exhaust of telephone numbers in the 360 area code. The Commission determined that a single area code would overlay all of western Washington, so that some customers in a geographic area would have telephone numbers with 360, 206, 253, or 425 area codes, while other customers in the same area would have numbers with the new NPA. As a result of successful number conservation efforts, however, the Commission subsequently suspended implementation of the new NPA.¹
- 3 On March 25, 2016, NANPA notified the Commission that the available codes in the 360 NPA will be exhausted in the first quarter of 2018. NANPA has reserved 564 as a new NPA to overlay all of western Washington, consistent with the Commission's prior order.
- 4 Commission regulatory staff (Staff) has proposed a plan to implement the 564 NPA prior to the forecasted exhaust. Under the plan, the industry would phase in use of the 564 area code in each existing NPA as it nears exhaust, beginning with the 360 area code in the fourth quarter of 2017. By September 30, 2017, all customers in western Washington would be required to dial 10 digits to place a call, even to a telephone number with the same area code as the caller's number.²

¹ Order Suspending Area Code Relief Plan, Docket UT-991535 (Sept. 5, 2001).

² The Federal Communications Commission has required 10-digit local dialing as part of any overlay. 47 C.F.R. § 52.19 (3)(ii). The Commission has retained the requirement of permissive 10-digit dialing in western Washington since approving the initial 564 NPA overlay plan.

- 5 On April 14, 2016, the Commission issued a Notice of Recessed Open Meeting and Opportunity to File Written Comments on Staff's proposed plan. The Commission received written comments from a coalition of telecommunications carriers³ and from Glenn Blackmon, all of whom support that plan.
- 6 On May 19, 2016, the Commission conducted a recessed open public meeting to consider implementation of the 564 NPA overlay. Staff recommended that the Commission take the following actions:
- (1) Approve a phased all-services overlay of the 564 area code for western Washington. Telephone numbers in that NPA would be available for customer assignment in each existing area code as those numbers near exhaust, starting with area code 360 no later than March 31, 2018. Industry providers must implement mandatory 10-digit local dialing throughout western Washington, including the 206, 253, 360, and 425 NPAs, by September 30, 2017.
 - (2) Require all western Washington telecommunications service providers to initiate a comprehensive education program introducing and explaining the need for mandatory 10-digit dialing, and begin network preparation and all other necessary implementation within 45 days from the date of the Commission's order.
 - (3) Direct Staff to participate in the technical deployment, customer education, community involvement, media releases, and public workshops to ensure the implementation of this plan. NANPA should coordinate with industry providers to develop milestones and file quarterly reports with the Commission on the last day of each calendar quarter until full completion, beginning September 30, 2016, and ending no later than March 31, 2018.

The Commission heard oral comments from NANPA, CenturyLink, and Washington Independent Telecommunications Association representatives, all of whom support Staff's proposed implementation plan and recommendations.

DISCUSSION

- 7 The Commission agrees with and adopts Staff's proposals and recommendations. We appreciate Staff's and the industry's efforts to conserve telephone number resources, allowing a substantial delay in implementation of the new 564 overlay NPA. In the years since the Commission approved that area code, overlays have become common, as has

³ 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.

10-digit dialing. Indeed, the advent of smart phones and other electronic devices has significantly reduced the need to manually dial telephone numbers for the majority of calls that most consumers make, lessening the inconvenience of more than one NPA covering the same geographic area. According to NANPA, 28 other states have implemented area code overlays and require 10-digit dialing.

8 The Commission previously determined in its May 2000 Order that the new 564 area code would cover all of western Washington, and we adhere to that determination for the reasons stated in that order. We recognize that this decision will require all telecommunications subscribers in this half of the state to dial 10 digits when placing all calls. We nevertheless find that the benefits of an overlay that spans all of western Washington far outweigh the slight burden on some consumers to dial 10 digits, rather than seven, even in the areas where 564 numbers are not yet assigned.

9 We also concur with Staff's proposal to make telephone numbers in that NPA available only when the numbers in the existing area codes are nearing exhaust. That is the purpose of the new NPA. We are concerned that a broader availability of those numbers would artificially stimulate demand, particularly among vanity number seekers, resulting in inefficient use of number resources.

10 This will be the first overlay NPA in Washington. Accordingly, we agree with Staff that its implementation must include robust industry outreach to consumers to inform them of the changes that will result. We direct Staff and the industry to work together in the technical deployment, customer education, and community involvement needed to ensure successful implementation of the 564 NPA. NANPA should also coordinate with industry providers to develop milestones and file status reports with the Commission by the last day of each calendar quarter beginning September 30, 2016, until the 564 NPA is fully implemented.

FINDINGS AND CONCLUSIONS

- 11 (1) The Commission has jurisdiction over matters involving the introduction of new area codes within Washington.
- 12 (2) The Commission should adhere to its previous conclusion to have the new 564 NPA overlay all of western Washington, with telephone numbers in that NPA available for assignment in areas covered by existing NPAs only when those NPAs are nearing exhaust to ensure efficient use of number resources.
- 13 (3) As federal law requires in all overlay NPA areas, telecommunications carriers must implement mandatory 10-digit dialing throughout the overlay area prior to making numbers in the new NPA available for assignment.

- 14 (4) NANPA estimates that telephone numbers in the 360 NPA will exhaust sometime in the first quarter of 2018. Accordingly, numbers in the 564 NPA overlay should be available for assignment during the third quarter of 2017, with 10-digit dialing required throughout western Washington by September 30, 2017.
- 15 (5) Staff and the telecommunications industry should be required to work together in the technical deployment, customer education, and community involvement needed to ensure successful implementation of the 564 NPA.
- 16 (6) NANPA should coordinate with industry providers to develop milestones and file status reports with the Commission by the last day of each calendar quarter until the 564 NPA is fully implemented, beginning September 30, 2016, and ending no later than March 31, 2018.

ORDER

THE COMMISSION ORDERS:

- 17 (1) The Commission adheres to its previous determination that the new 564 numbering plan area must overlay all of western Washington.
- 18 (2) The North American Numbering Plan Administrator may assign central office codes with telephone numbers in the 564 area code in the existing 360 numbering plan area beginning in the third quarter of 2017. The Administrator may assign those codes in the other existing numbering plan areas in western Washington only when the Administrator forecasts, and the Commission confirms, that those number plan areas are nearing exhaust.
- 19 (3) Telecommunications service providers with telephone number resources in the 206, 253, 360, and 425 numbering plan areas must implement mandatory 10-digit dialing for all calls throughout those areas by September 30, 2017.
- 20 (4) Telecommunications service providers with number resources in the 206, 253, 360, and 425 numbering plan areas must work with Staff on the technical deployment, customer education, and community involvement needed to ensure successful implementation of the 564 numbering plan area.
- 21 (5) The North American Numbering Plan Administrator, in conjunction with telecommunications service providers with number resources in the 206, 253, 360, and 425 numbering plan areas, must file reports with the Commission on the status of implementation of the 564 numbering plan area by the last day of each calendar quarter beginning September 30, 2016, until the 564 numbering plan area is fully implemented.

- 22 (6) The Commission retains jurisdiction over these matters to enforce the terms of this Order.

DATED at Olympia, Washington, and effective May 19, 2016.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

PHILIP B. JONES, Commissioner

ANN E. RENDAHL, Commissioner