

Informal Comments Regarding a Possible Petition to the FCC for Waiver of Its  
Mandatory Ten-Digit Dialing Rule

October 13, 1999

To: Glenn Blackmon, Washington Commission  
From: Joanne Edelman, AirTouch Cellular

Glenn:

Below are our comments regarding the request you put out asking for informal comments regarding the requirement of 10-digit dialing when an overlay is implemented. AirTouch's position is there must be mandatory 10-digit dialing whenever an overlay is implemented.

In some cases, we would support permissive 10-digit dialing in an overlay for a limited period of time. A date when mandatory 10-digit dialing would be implemented (an additional month or so later) would have to be decided upon. However, in this case, it appears this would be permanent rather than temporary.

If you wish to discuss this further, I can be reached at 925-279-6159. Vickie Williams will be representing us at the implementation meeting on Thursday October 14, 1999.

*The 360/564 area is more rural than the typical area where an overlay code has been implemented. The FCC rule requiring 10 –digit dialing contemplates a more urban application of the overlay method, in which it would not be practical to keep prefixes from the two area codes from overlapping in a single local calling area.*

When the FCC ruled there would be 10 digit dialing in an overlay, they did not distinguish (nor did they mean to) between rural and urban. Rural vs. Urban has nothing to do with how many digits are dialed.

*The numbering administrator could assign prefixes from the 360 and 564 area codes such that no local calling area has the same prefix twice, once as a 360 number and once as a 564 number. The 360 and 564 area codes each have 762 prefixes available, and no local calling area includes more than 100 prefixes so there is ample discretion to avoid duplicate prefixes within each calling area.*

It is certainly possible for the code administrator to start this practice once the 564 overlay is implemented, however, wireless does not use the same rate area boundaries as wireline (ours are much larger) and eventually these prefixes may have to be duplicated.

*With numbers assigned to avoid the same prefix appearing twice in a local calling area, there is not technical barrier to permissive 10-digit dialing. Here a seven-digit number is assumed to have whatever area code is local for that prefix.*

Land to mobile might not always be in the local calling area. Wireless does not take numbers out of every rate center.

*The dialing arrangement described above is already being used in at least one exchange of the 360/564 area.*

All this is doing is exasperating the protected code problem. When there is area code relief, the guidelines specifically state protected codes should try to be eliminated. We do not want to continue to have protected dialing over NPA boundaries.

*The programming changes required to implement the permissive 10 digit dialing arrangement described above would not be an undue burden on the telecommunications industry, particularly when weighed against the costs the industry and consumers would incur to implement mandatory 10 digit dialing.*

We do not understand how the industry costs will be that different for permissive and mandatory.

*The permissive 10 digit dialing arrangement described above would not cause any disadvantage to competitors who disproportionately are assigned numbers from the 564 code. For both incumbents and new entrants, every local call could be dialed as a seven-digit number, and every toll call would require dialing 1 plus the area code and seven-digit number.*

One of the greatest concerns of the CLECS regarding the overlay was not only dialing parity but also the imbedded customer base. The majority of the imbedded customer base would be in the 360 NPA. The people in the 564 NPA (mainly CLEC customers) would have to dial 10 digits to call into the majority of the businesses, etc. in the 360 NPA, while the 360 customers would have the luxury of calling the 360 numbers using only 7 digits. There would be the possibility of a large business customer not wanting to be “stole away” from their current telephone company in the 360 NPA to move to the 564 NPA, where most people would have to dial 10 digits to reach them. It is unknown how long it would take to fill up the 564 NPA.

*The dialing arrangement would significantly reduce the burden on consumers who otherwise would have to dial 10 digits for every local call. Regardless of the area code, a customer could dial the seven-digit telephone number for a local call. Some confusion about area codes would remain since most local calling areas would have a mix of 360 and 564 numbers. However, even if a customer erroneously assumes that a call from a 564 number to a local 360 number requires 10 digits, the call will still complete.*

What happens when duplicate codes have to be assigned? Many types of services pay by the call (wireless, measured local service, limited business service). There will be customer aggravation by dialing wrong numbers, being charged for getting a wrong number. If you were in the 360 NPA and dialed a number thinking your party was in the 360 NPA, but then found it was in the 564 NPA, by the time you have reached your number, you have dialed 17 numbers. If all were 10-digit dialing, this would be eliminated.

*This dialing arrangement would significantly reduce the burden on business and consumers who have automatic dialing devices. No reprogramming would be required if 10-digit dialing were permissive rather than mandatory.*

The permissive dialing period gives customers sufficient time to do all of their reprogramming. Once it is done, it is done forever. How many redialers use 800 numbers, which would not have to be reprogrammed?

*This dialing arrangement would significantly reduce the burden on young children.*

Children need to be taught their telephone number is 10 digits not 7. If they were to be taken outside of their local area, they need this information. Children are very resilient and teachable. They adapt very easily. Why not maintain a child's view of all numbers being 10 digits.

*The public education program to be undertaken by the industry would be different in focus and overall less extensive if 10 digit dialing is merely permissive. Educating the public about permissive 10-digit dialing is a much less daunting effort.*

How is this less daunting, the same kinds of notices still need to be sent? This could be extremely confusing to the public.

*It would be in the public interest to avoid mandatory 10-digit dialing in the 360/564 area even if mandatory 10-digit dialing becomes necessary in the 206 and 425 areas, so long as 10-digit dialing is permissive in the 360/564 area.*

Because of confusion many people will automatically dial 10 digits so why not make it mandatory.