

Lockheed Martin IMS
Communications Industry Services
1133 15th Street N.W. Washington, D.C. 20005
Telephone 202-756-5600 Facsimile 202-887-0331



October 18, 1999

Mr. Glen Blackmon
Washington Utilities & Transportation Commission
1300 Evergreen Park Drive S.W.
Olympia, WA 98504

RE: Docket No. UT-990219, 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.

Dear Mr. Blackmon,

In response to your request for comments regarding the potential petition of the FCC for a waiver of the mandatory 10-digit dialing rule to permit 7-digit dialing within the 360-564 area code overlay we have compiled several items of consideration for the WUTC if this waiver were granted.

In establishing the sub-regions within the overlaid area for 7-digit dialing:

Consideration would be needed for expanded local calling areas (EAS or ELCA) and for future EAS that may be granted after the overlay is in place. Presently NANPA- CO Code Administration does not have listings of local calling areas and additionally would need to have updates to changes/ additions as they occur. The question arises how would NANPA be notified.

The local calling areas would need to be defined. NANPA-CO Code Administration would have to build conflict tables into the code assignment database to identify NXX codes that may cause dialing conflicts if assigned.

Some Service Providers may not be required to report their offered local calling areas to the WUTC or NANPA, or the calling areas might change with various service offerings and NANPA wouldn't be advised. If NANPA – CO Code Administration was unaware of these additions or changes, a code may be assigned that would cause a conflict.

Different types of Service Providers (SPs) – LEC, CLEC, Wireless, offer different calling scopes and different local calling areas to their customers. These calling areas are not the same and some may be outside the limits to the WUTC's 7-digit calling areas. There exists the potential of some service providers' calling areas including several NPAs outside the 360-564 overlay area. The cellular and PCS wireless providers are one example that would exempt them from offering 7-digit dialing to their customers, this dialing disparity could be considered a form of discrimination toward an industry segment since they couldn't offer 7-digit dialing.

Some service providers have switches with technical limitations on using certain NXX codes, some SPs may have other reasons for not using certain NXX codes and may eventually run into situations where the codes available for assignment for that particular local calling area would cause a conflict.

At some point in time, there may be situations in which there is not an available NXX code that would not cause a conflict and the code request would not be fulfilled.

The 7-digit calling areas must be clearly defined and the rate areas within them identified by the WUTC for the industry and NANPA to fully understand the limits of NXX code assignment and translation requirements for routing and rating of calls. None of this has been mapped out and analyzed for any

code conflicts.

Consideration would need to be made for the subsequent relief once the 564 NPA exhausts. The subsequent relief of an overlay would most likely be another overlay. At some point in time, this dialing plan would need another set of changes.

One of the industry's criteria in area code relief planning is to minimize customer confusion when considering NPA relief alternatives. A considerable effort must be made by the industry to fully educate the 360-564 customers on the relief plan. This 7-digit dialing within the overlay was not part of the industry's original plan and may contain customer confusion issues. The industry would need clear directions and an appropriate amount of time to properly educate their customers. Some educational efforts about the 10-digit dialing requirements have already begun such as changes to some printed directories and press releases.

This concept also appears to have the potential of limiting the availability of numbering resources. If the waiver were granted, an even closer administration of the NXX code assignments within the 360 and 564 NPAs would be required by NANPA. As you know, NANPA's main concern is providing unlimited and equal access to numbering resources to the telecommunications industry. Please keep us informed as to the progress of your inquiry and your decision regarding this petition.

If you have any question, please call me at (805) 492-6327.

Sincerely,

Joseph R. Cocke

Sr. NPA Relief Planner – Western Region
NANPA

C: Rebecca Beaton – WUTC
David Griffith – WUTC
Bruce Bennett – NANPA