Agenda Date: Item Number:	December 10, 2003 A5 and A6	
Dockets: Company:	UT-031803 and UT-991627 United Telephone Company of the Northwest, dba Sprint Qwest Corporation	
Staff:	Glenn Blackmon, Assistant Director-Telecommunications	

Recommendation:

Issue an order approving the rate center consolidations listed in Appendix A and directing United Telephone Company of the Northwest and Qwest Corporation to complete the consolidations by March 1, 2005.

Discussion:

In its ongoing review of the use of telephone prefixes in the state, the WUTC Staff has identified several areas where prefixes could end up being wasted because of unnecessarily small rate centers. A rate center is a geographic area, often identical to an exchange. Any given telephone prefix can be used only within one rate center. Therefore the number of prefixes required increases with the number of rate centers, and except in the most urban area, the number of rate centers is a much bigger factor in area code exhaustion than is the number of telephone numbers assigned. Consolidation of rate centers reduces the number of prefixes required and ultimately reduces the likelihood that the state will have to add an area code.

Rate centers are also used to define local calling areas. Any two rate centers will have either local calling or toll calling between them. The primary reason not to consolidate rate centers is that doing so can change the scope of customers' local calling areas. If two rate centers that have different local calling areas are consolidated, that calling-area difference cannot be maintained after consolidation.

The rate center consolidations identified by Staff are listed in Appendix A. Staff identified these by reviewing the rate centers where Sprint is the incumbent local exchange company. In one instance, the recommended consolidation includes a rate center (Port Angeles) served by Qwest.

This proposal would consolidate only rate centers that already have the same local calling area, and it would have no effect on the local rates of Sprint or Qwest. The consolidation of these rate centers will not immediately free up any telephone prefixes, but it will reduce the number of prefixes that may be required in the future.

The WUTC has approved earlier rounds of rate center consolidation covering areas where Qwest, Verizon, or CenturyTel is the incumbent local exchange company.

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Neither Sprint nor Qwest objects to the proposed consolidation. However, Sprint asked that the consolidations be delayed until March 1, 2005. Sprint is undertaking a major change in the system that it uses to administer numbering resources and believes it would be difficult to implement a consolidation during this process.

An implementation period of this length is exceptionally long. However, Sprint has taken affirmative steps to make numbering resources available in each of the rate centers, except Toppenish, in the interim. With those steps implemented, Staff believes the requested date is reasonable.

Conclusion:

Staff recommends that the rate center consolidations listed in Appendix A be approved. They will help reduce the likelihood that customers will have to change their area code or begin 10-digit dialing in the future, and there is no impact on the rates or local calling scope of any customer.

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APPENDIX A

Recommended Rate Center Consolidations To Be Implemented by March 1, 2005

Current Rate Centers	Consolidated Rate Centers
Toppenish Zillah	Toppenish
Mabton	Mabton
Bickleton	
Brinnon	HoodCanal
Quilcene	
Gardiner	Port Angeles
Port Angeles	
Dallesport	Dallesport
Wishram	