

Glenn,

Here are MCIW's informal comments regarding the 360/564 NPA Overlay.

Rogelio

MCIW is opposed to the Washington Utilities and Transportation Commission ("WUTC") filing for a waiver of mandatory 10 digit ("10D") dialing in the proposed 360/564 NPA Overlay area. The Federal Communications Commission ("FCC") requirement of mandatory 10D dialing was to promote the fair entry into the competitive market place. The suggestion that the FCC only envisioned this requirement in more urban areas when overlays are introduced, would then have envisioned that overlays would only be introduced in only urban areas where competition has already taken a foothold. Clearly, that is not the case in the 360/564 Overlay area, which encompasses a great portion of Western Washington, much of which is rural.

As understood by MCIW, Staff's proposal would envision something similar to protected codes, without the need to protect. For example, imagine a square block (representing the current 360 area) divided into quadrants, labeled A, B, C & D, representing separate regions. Staff's proposal would have NANPA assign NXXs in Region A from the new NPA that would not have already been assigned in Region A from 360. The same would happen for B, C and D. Essentially no duplication of codes within a region for the overlaid 360/564. Thereby assuming 7 digit ("7D") dialing.

After looking at this more closely, this cannot technically be done. Inter-switch routing is done based on the first 6 digits (NPA-NXX). Routing is not done by Region on a 7 digit basis (NXX-XXXX). A customer who has been assigned 360 NPA and wishes to dial a customer in 564 using only 7-digits is not technically possible since the switch will automatically assume the customer is dialing within the 360 and appends that NPA 360.

Dialing between NPAs must be done on a 10-digit basis, unless codes have been protected. The only codes that can now technically be protected are those in 360 that have yet to be assigned.

The FCC gave jurisdiction to the states to resolve matters involving the implementation of new area codes, since they felt states were uniquely positioned to understand local conditions and what effect new area codes will have on those conditions. The time to question and evaluate the affect of mandatory 10 digit dialing on the public should have been done prior to the acceptance of the recommended overlay, not at this time.

In summary, it is MCIW's position that if the WUTC feels that strongly about the need to retain 7 digit dialing in the 360 NPA, it should reverse the industry recommendation for an overlay and order a split, which would then retain 7D dialing for most of the 360 area.

Please contact Suzanne Brooks (206-777-4447) or Rogelio Pe?a at (303-442-4300) if you have any questions.