

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the ) DOCKET UT-060012  
Conservation of )  
Numbering Resources ) ORDER 01  
)  
)  
)  
) ORDER IMPLEMENTING  
) MANDATORY THOUSANDS-  
) BLOCK NUMBER POOLING IN  
) THE 360 NUMBER PLAN AREA  
..... )

**OVERVIEW**

1 This docket presents the Commission the opportunity to implement measures to forestall the need to create new area codes within the 360 and 509 area codes. Area codes are also called “Numbering Plan Areas” or “NPAs.” In this order, the Commission adopts one such measure, called “thousands-block number pooling.” The Commission decides to mandate such number pooling within the 360 NPA. The Commission will address the 509 NPA in a future order.

**BACKGROUND**

2 When a telecommunications company offers service to a new customer, it usually needs to offer that customer a telephone number. Historically, telecommunications companies received a block of ten thousand telephone numbers at a time, which is the maximum number of telephone numbers available under a specific “prefix,” such as “644”-XXXX.

3 Within an area code or NPA there are a finite number of prefixes. Therefore, while there is a very large number of telephone numbers available within an area code, that number is finite.

4 Eventually, services that use numbers, industry member allocation of numbers, and population growth will cause the available telephone numbers within an area code to be used up, and a new area code will need to be created. However, alternative means are available to assure the availability of telephone numbers, thereby delaying the date for creating a new area code.

5 One alternative means of assuring the availability of telephone numbers is called  
“thousands-block number pooling.” Thousands-block number pooling means each code  
of ten thousand telephone numbers is broken down into ten blocks of one thousand  
numbers each. These ten blocks of one thousand numbers are “pooled,” thereby making  
each one thousand block of telephone numbers available to different telecommunications  
companies.<sup>1</sup>

6 Thousands block number pooling more efficiently utilizes available telephone numbers,  
which can significantly delay the date for creating a new area code.

### JURISDICTION

7 Historically, the Federal Communications Commission (FCC) has had exclusive  
jurisdiction for allocating telephone numbers for telecommunications companies in this  
state.<sup>2</sup> However, on November 9, 2006, the FCC granted the Commission authority to  
implement mandatory thousands-block number pooling within the 360 and 509 NPAs.<sup>3</sup>

8 The FCC has already ordered mandatory thousands-block number pooling in 58 rate  
centers in the 360 NPA.<sup>4</sup> Number pooling currently is optional or excluded in the other  
19 rate centers in the 360 NPA.

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<sup>1</sup> For example, assume a particular telecommunications company needed only 500 new telephone numbers. Without thousands-block number pooling, that company would receive 10,000 numbers, thus “stranding” some 9,500 numbers until the company acquired thousands of new customers, which could take years. By contrast, under thousands-block number pooling, that company would receive a block of 1,000 numbers, and the remaining 9,000 numbers in the original 10,000 number block would be available immediately to customers of other companies.

<sup>2</sup> *E.g.*, 47 U.S.C. § 251(e) (FCC is granted authority to administer the portions of the “North American Numbering Plan” that apply to the United States).

<sup>3</sup> *In re Numbering Resource Optimization, Petition for Delegated Authority by the Public Utilities Commission of Ohio, Petition of the New York State Department of Public Service for Mandatory Pooling, Petition of the Washington Utilities and Transportation Commission for Mandatory Number Pooling, the New Mexico Public Regulation Commission’s Petition for Delegated Authority to Implement Additional Number Conservation Measures*, CC Docket No. 99-200, DA 06-2299 (November 9, 2006).

<sup>4</sup> A “rate center” is a carrier-designated geographic location. Telephone numbers are assigned by rate center. For example, all of a carrier’s customers who have telephone numbers with the same prefix (*e.g.*, “664”-XXXX) are in the same rate center.

### PUBLIC COMMENT

- 9 On December 6, 2006, the Commission issued a Notice soliciting comments from interested members of the telecommunications industry and other members of the public, regarding whether or not the Commission should mandate number pooling throughout the 360 NPA. Only one party filed written comments on January 10, 2007. The Washington Attorney General's office of Public Counsel (Public Counsel) filed comments, supporting mandatory number pooling statewide as an important number conservation measure to benefit consumers in Washington.
- 10 On January 24, 2007, the Commission received oral comments in this matter. A representative of the Washington Public Counsel ("Public Counsel") section of the Attorney General's office commented and a representative of the NeuStar Pooling Administrator commented. Public Counsel stated that measures such as thousand's block number pooling have successfully delayed implementation of new area codes in the state, that it is in the best interest of consumers that the Commission responsibly manage the state's number resources, and avoid unnecessary expansion. The FCC's Pooling Administrator, NeuStar, commented on the implementation process for mandatory number pooling in Washington and defined their role in assuring compliance by industry members of mandatory pooling by Commission order and due date.

### DISCUSSION

- 11 The FCC's North American Number Plan Administrator estimates that without mandatory number pooling, the need for area code relief in the 360 NPA will arise in the first quarter of 2010.<sup>5</sup> Moreover, all carriers in Washington State are currently capable of local number pooling. Creating new area codes is costly and confusing to consumers. The cost and inconvenience of area code overlays and splits are very substantial.<sup>6</sup> Area code changes create inconveniences and additional costs for consumers and the telecommunications industry alike. When the western Washington overlay plan process was initiated in 2001 for the 564 area code, telecommunications industry members in

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<sup>5</sup> North American Numbering Plan Administration, *2006 NRUF and NPA Exhaust Analysis* (October 31, 2006). Forecast for the second half of 2006 (check that that is what 2006.2 means or if quarterly). [http://www.nanpa.com/pdf/NRUF/2006-2NPA\\_Exhaust\\_Projections.pdf](http://www.nanpa.com/pdf/NRUF/2006-2NPA_Exhaust_Projections.pdf)

<sup>6</sup> See (e.g.), *FCC Numbering Resource Optimization Docket*, Order FCC 99-200, DA 06-14 (February 17, 2006); at 4 (b) (7), (See) (e.g.) FCC First Report and Order, 15 FCC Rcd at 7348 7651-52, (2000) ¶ 170.

Washington allocated 1.2 million dollars to educate consumers on the change.<sup>7</sup> In particular, the cost to change an individual business' contact information as a result of an area code split or overlay can be several thousand dollars.<sup>8</sup> When an area code changes, it places a major economic burden on consumers and businesses, as well as less tangible burdens.

- 12 Mandatory number pooling has proven to an effective number conservation tool in Washington and assures optimal conservation of numbering resources. As Appendices A and B show, the rate centers moving from optional or excluded number pooling to mandatory number pooling are largely served by Qwest, Verizon, Sprint, CenturyTel and their competitors. The affected rate centers are listed in Appendix A. Currently affected telecommunications carriers are listed in Appendix B.
- 13 The Commission decides that mandatory thousands-block number pooling is appropriate for the rate centers in the 360 NPA for which such pooling is currently optional or excluded for thousands-block number pooling by July 31, 2007.
- 14 To implement this decision, all non-paging carriers with numbering resources in these rate centers must evaluate their inventories and be prepared to donate uncontaminated one thousand blocks, and one thousand blocks that are up to ten percent contaminated, to the rate center numbering resources pool in accordance with the Industry Numbering Committee Thousands- Block Number (NXX-X) Pooling Administration Guidelines (ATIS-0300066). All numbering resources will be allocated to non-paging carriers in blocks of 1,000 through the Pooling Administrator, currently NeuStar Inc.
- 15 For purposes of this Order, "uncontaminated thousands-blocks" means blocks of one thousand sequential telephone numbers within a ten thousand number code, of which the carrier has used no telephone numbers. A one thousand number block that is up to ten percent "contaminated" means a block of one thousand sequential telephone numbers within a ten thousand number code, of which the carrier has used one hundred or fewer numbers.

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<sup>7</sup> See, e.g., *In re Area Code Relief for the 206, 253, 425 and 360 Number Plan Areas*, Docket UT-991535, Order Approving Expenditure and Refunds of Education Plan Funds (Oct 31, 2001) at ¶ 2.

<sup>8</sup> By analogy, in the context of a street name change, one business estimated the cost to change business cards, stationary etc. to be around \$11,000 (King County Journal (Aug 25, 2004), at 1, ¶ 3. (www.kingcountyjournal.com) Taneum Computer Products Inc, S. Grand., Another business estimated a cost of \$157,000, Renton City Council Meeting Minutes, (Sep 20, 2004), at 3, ¶ 13.

16 Bi-annual Numbering Resource Utilization/Forecast (NRUF) reporting will be completed on the one thousand block level for rate centers marked as mandatory (M or M\*) by the Pooling Administrator.

### FINDINGS AND CONCLUSIONS

- 17 (1) The Washington Utilities and Transportation Commission is an agency of the State of Washington vested by statute with the authority to regulate rates, rules, regulations, practices, accounts, securities, and transfers of public service companies, including telecommunications companies. *RCW 80.01.040, RCW 80.04, RCW 80.36, RCW 80.08 and RCW 80.12.*
- 18 (2) The Commission has jurisdiction over this matter pursuant to RCW 80.36.610, which gives the Commission authority to take actions necessary to implement the Federal Telecommunications Act of 1996, and pursuant to the FCC's November 9, 2006, order in CC Docket No. 99-200.<sup>9</sup>
- 19 (3) This matter was brought before the Commission at its regularly scheduled meeting on January 24, 2007.
- 20 (4) Based on the comments and information filed in this docket, the Commission finds that number pooling in the 360 NPA should be mandatory by July 31, 2007.
- 21 (5) Rate centers within the 360 NPA, currently marked optional or excluded for thousands-block number pooling, should be designated as mandatory by July 31, 2007.
- 22 (6) The telecommunications companies holding numbers in the 360 area code should ready their inventories to donate uncontaminated thousands-blocks, and thousands-blocks that are up to 10% contaminated, to the rate center number pool. For purposes of this Order, "uncontaminated thousands-blocks" means blocks of one thousand sequential telephone numbers within a ten thousand number code, of which the carrier has used no telephone numbers. A one thousand number block that is "up to ten percent contaminated" means a block of one thousand

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<sup>9</sup> This FCC order is cited in footnote 6, *supra*.

sequential telephone numbers within a ten thousand number code, of which the carrier has used one hundred or fewer numbers.

- 23 (7) All numbering resources should be allocated in thousands-blocks within rate centers listed in Appendix A, in conjunction with the Pooling Administrator by July 31, 2007
- 24 (8) Numbering Resource Utilization/Forecast data should be reported for the rate centers listed in Attachment A at the thousands-block level.
- 25 (9) All non-paging carriers with numbering resources in the 360 NPA should attend industry meetings regarding thousands-block number pooling in the 360 NPA, as scheduled by the Pooling Administrator.

## **ORDER**

### **THE COMMISSION ORDERS:**

- 26 (1) Rate centers within the 360 numbering plan area, currently marked optional or excluded for thousands-block number pooling, are designated as mandatory for thousands-block number pooling by July 31, 2007. These rate centers are listed on Appendix A to this Order.
- 27 (2) Non-paging carriers shall ready their inventories to donate uncontaminated thousands-blocks, and thousands-blocks that are up to 10% contaminated, to the rate center number pool. For purposes of this Order, “uncontaminated thousands-blocks” means blocks of one thousand sequential telephone numbers within a ten thousand number block, of which the carrier has used no telephone numbers. A one thousand number block that is “up to ten percent contaminated” means a block of one thousand sequential telephone numbers within a ten thousand number block, of which the carrier has used one hundred or fewer numbers.
- 28 (3) All numbering resources are allocated in thousands-blocks within rate centers listed in Attachment A, in conjunction with the Pooling Administrator, by July 31, 2007.

- 29 (4) Numbering Resource Utilization/Forecast data shall be reported for the rate centers listed in Attachment A at the thousands-block level.
- 30 (5) All non-paging carriers with numbering resources in the 360 numbering plan areas shall attend industry meetings regarding thousands-block number pooling in the 360 numbering plan area, as scheduled by the Pooling Administrator.
- 31 (6) This Order shall not affect the Commission's authority over rates, services, accounts, evaluations, estimates, or determination of costs in any matters that may come before it, nor be construed as acquiescence in any estimate or determination of costs claimed or asserted.
- 32 (7) The Commission retains jurisdiction over the subject matter to effectuate the provisions of this Order.

DATED at Olympia, Washington, and effective January 24, 2007.

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**MARK H. SIDRAN, Chairman**

**PATRICK J. OSHIE, Commissioner**

**PHILIP B. JONES, Commissioner**

**Appendix A Rate Centers in the 360 NPA**

<b>NPA</b>	<b>Abbreviated Rate Center</b>	<b>Rate Center Full Name</b>	<b>NPA Complex</b>	<b>FCC Top 100 MSA Name</b>	<b>Pooling Status</b>
360	ABERDEEN	ABERDEEN	360	NA	M
360	AMBOY	AMBOY	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	ASHFORD	ASHFORD	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BATTLEGRND	BATTLE GROUND	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	BELFAIR	BELFAIR	360	NA	M
360	BLACKDIMND	BLACK DIAMOND	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BREMERTON	BREMERTON	360	NA	M
360	BUCKLEY	BUCKLEY	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	BUCODA	BUCODA	360	NA	M
360	CAMAS	CAMAS	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	CASTLEROCK	CASTLE ROCK	360	NA	M
360	CATHLAMET	CATHLAMET	360	NA	O
360	CENTRALIA	CENTRALIA	360	NA	M
360	CHEHALIS	CHEHALIS	360	NA	M
360	CHIMACMCTR	CHIMACUM/CENTER	360	NA	O
360	COPALIS	COPALIS	360	NA	M
360	COUGAR	COUGAR	360	NA	O
360	CRYSTAL MT	CRYSTAL MOUNTAIN	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	CURTIS	CURTIS	360	NA	O
360	DEWATO	DEWATO	360	NA	X
360	EATONVILLE	EATONVILLE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	ELMA	ELMA	360	NA	M
360	ENUMCLAW	ENUMCLAW	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	FORKS	FORKS	360	NA	M
360	GRAYHARBCO	GRAYS HARBOR CO	360	NA	M
360	GRAYS RIVER	GRAYS RIVER	360	NA	X
360	HAT ISLAND	HAT ISLAND	360	(Seattle--Bellevue--Everett, WA PMSA)	M



360	HOOD CANAL	HOOD CANAL HOOD CANAL	360	NA	M
360	HOODSPORT	HOODSPORT	360	NA	M
360	KALAMA	KALAMA	360	NA	X
360	KINGSTON	KINGSTON	360	NA	M
360	LA CENTER	LA CENTER	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	LKQUINAULT	LAKE QUINAULT	360	NA	O
360	LONG BEACH	LONG BEACH	360	NA	M
360	LONGVIEW	LONGVIEW	360	NA	M
360	MARYSVILLE	MARYSVILLE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	MONTESANO	MONTESANO	360	NA	O
360	MORTON	MORTON	360	NA	M
360	MOSSYROCK	MOSSYROCK	360	NA	O
360	MT VERNON	MOUNT VERNON	360	NA	M
360	NASELLE	NASELLE	360	NA	X
360	OAK HARBOR	OAK HARBOR	360	(Seattle--Bellevue--Everett, WA PMSA)	M
360	OCOSTA	OCOSTA	360	NA	O
360	OLYMPIA	OLYMPIA	360	NA	M
360	ORTING	ORTING	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	PACIFICBCH	PACIFIC BEACH	360	NA	O
360	PORT ORCH	PORT ORCHARD	360	(Tacoma, WA PMSA)	M
360	PORTLUDLOW	PORT LUDLOW	360	NA	M
360	POULSBO	POULSBO	360	NA	M
360	PT ANGELES	PORT ANGELES	360	NA	M
360	PT ROBERTS	POINT ROBERTS	360	NA	X
360	PTTOWNSEND	PORT TOWNSEND	360	NA	M
360	PUGET IS	PUGET ISLAND	360	NA	O
360	RAINIER	RAINIER	360	NA	M
360	RIDGEFIELD	RIDGEFIELD	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	ROCHESTER	ROCHESTER	360	NA	M
360	SALKUM	SALKUM	360	NA	O
360	SAN JUAN	SAN JUAN	360	NA	M
360	SHELTON	SHELTON	360	NA	M
360	SILVERDALE	SILVERDALE	360	NA	M
360	SKYKOMISH	SKYKOMISH	360	Seattle-Tacoma-Bellevue, WA	M

				Metropolitan Statistical Area	
360	SNOHOMISH	SNOHOMISH	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	SO PRAIRIE	SOUTH PRAIRIE	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	SO WHIDBEY	SOUTH WHIDBEY	360	(Seattle--Bellevue--Everett, WA PMSA)	M
360	SOUTH BEND	SOUTH BEND	360	NA	M
360	STEVESPASS	STEVENS PASS	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M
360	TENINO	TENINO	360	NA	M
360	TOLEDO	TOLEDO	360	NA	X
360	UNION	UNION	360	NA	X
360	VADER	VADER	360	NA	O
360	VANCOUVER	VANCOUVER	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	WHATCOMCTY	WHATCOMCTY	360	NA	M
360	WINLOCK	WINLOCK	360	NA	M
360	WOODLAND	WOODLAND	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YACOLT	YACOLT	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YALE	YALE	360	Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area	M
360	YELM	YELM	360	Seattle-Tacoma-Bellevue, WA Metropolitan Statistical Area	M

## Appendix B Carriers

- 1 ADVANCED TELCOM GROUP, INC. – WA
- 2 AIRTOUCH COMMUNICATIONS, INC.
- 3 ARCH WIRELESS HOLDINGS, INC.
- 4 AT&T LOCAL
- 5 BEAVER CREEK TELEPHONE COMPANY – WA
- 6 BLUE LICENSES HOLDING, LLC
- 7 CENTURYTEL OF INTER-ISLAND, INC.
- 8 CENTURYTEL OF WASHINGTON, INC.
- 9 COMCAST PHONE OF WASHINGTON/OREGON, LLC – WA
- 10 COOK TELECOM, INC.
- 11 ELECTRIC LIGHTWAVE, INC. – OREGON
- 12 ELECTRIC LIGHTWAVE, INC. – WASHINGTON
- 13 ESCHELON TELECOM OF WASHINGTON, INC. – WA
- 14 FOCAL COMMUNICATIONS CORPORATION OF  
WASHINGTON
- 15 GLOBAL CROSSING LOCAL SERVICES, INC.-WA
- 16 HAT ISLAND TELEPHONE CO.
- 17 HOOD CANAL TELCO, INC. DBA HOOD CANAL COMM - WA
- 18 HOOD CANAL TELEPHONE CO.
- 19 INLAND TELEPHONE CO.
- 20 INTEGRA TELECOM OF WASHINGTON, INC. – WA
- 21 INTERNATIONAL TELCOM, LTD. – WA
- 22 KALAMA TELEPHONE CO.
- 23 KMC DATA LLC – OR
- 24 KMC DATA LLC – WA
- 25 LCW WIRELESS, LLC
- 26 LEVEL 3 COMMUNICATIONS, LLC – WA
- 27 LEWIS RIVER TELEPHONE CO., INC.
- 28 LOCAL ACCESS PRIME, LLC – WA
- 29 MASHELL TELECOM, INC.
- 30 MCDANIEL TELEPHONE CO.
- 31 MCIMETRO, ATS, INC.
- 32 MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- WA
- 33 METROCALL
- 34 NEXTEL COMMUNICATIONS, INC.
- 35 NORTH COUNTY COMMUNICATIONS CORP. – OR
- 36 PAC - WEST TELECOMM, INC. – WA
- 37 QWEST CORPORATION
- 38 SBC LONG DISTANCE, LLC DBA AT&T LONG DISTANCE –  
OR
- 39 SPRINT COMMUNICATIONS COMPANY, L.P. – WA
- 40 SPRINT SPECTRUM L.P.
- 41 TELEPORT COMMUNICATIONS GROUP – SEATTLE
- 42 TELEPORT COMMUNICATIONS GROUP, INC. – OR
- 43 TENINO TELEPHONE CO.

- 44 TIME WARNER OF TELECOM OF WASHINGTON – WAS
- 45 TIME WARNER TELECOM OF OREGON, LLC-OR
- 46 T-MOBILE USA, INC.
- 47 TOLEDO TELEPHONE CO., INC.
- 48 TSS DIGITAL SERVICES, L.C.C. – WA
- 49 UNITED STATES CELLULAR CORP. – WASHINGTON
- 50 UNITED TELEPHONE – NORTHWEST
- 51 VERIZON NORTHWEST INC.
- 52 VERIZON NORTHWEST INC.-OR
- 53 VERIZON NORTHWEST INC.-WA
- 54 VERIZON NORTHWEST INC.-WA (CONTEL)
- 55 WESTERN WAHAKIACUM COUNTY TELEPHONE CO.
- 56 WHIDBEY TELEPHONE CO.
- 57 XO OREGON, INC.
- 58 YCOM NETWORKS, INC.