

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**DOCKET NO. UT- 990219**

**INFORMAL COMMENTS IN RESPONSE TO  
REQUEST FOR COMMENTS, DATED OCTOBER 8, 1999**

These informal comments are respectfully submitted on behalf of Whidbey Telephone Company ("Whidbey") and Hat Island Telephone Company ("Hat Island") in response to the Request for Comments, dated October 8, 1999, issued by the Washington Utilities and Transportation Commission ("Commission") in the above-referenced docket.

Whidbey and Hat Island (the "Companies") respectfully urge the Commission to petition the FCC for a waiver of the 10-digit dialing requirement for the 360/564 area so as to permit, but not require, a continuation of 7-digit local calling. These companies have previously made known their concerns over the prospect of mandatory 10-digit local calling attendant upon assignment of an overlay NPA. Accordingly, they applaud the initiative by the Commission and Commission Staff in pursuing a possible solution that would permit a continuation of 7-digit local calling in at least some areas.

While their investigation is not yet complete, thus far the Companies have not identified any technical impediment to the implementation of the solution outlined in the Request for Comments. They have identified one complication, which relates to the deployment of Local Number Portability ("LNP").<sup>1</sup> That complication is that when, in an office that has deployed LNP, a 7-digit local call is placed to a number that may have been ported, the NPA field of the called number must be populated in the LNP query that is launched by the originating switch. The Companies have not yet been able to identify the basis on which that NPA field in the LNP query would be populated in the absence of 10-digit local dialing. Until that question is satisfactorily resolved, the deployment of LNP in a central office for which the local calling area includes NXXs in more than one NPA may present a problem for 7-digit local dialing. Some central offices may be able to identify the implied NPA for each "unique" local NXX and populate the NPA of the called number in the LNP query appropriately. However, in situations where that is not the case, 10-digit local calling may be necessary in order successfully to reach a local number that has been ported.

In the Companies' view, the potential for LNP complications is not a sufficient reason to forego the advantages of permissive 7-digit local calling until such time as the deployment of LNP or constriction in available numbering resources were to make mandatory 10-digit local calling

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<sup>1</sup> References to "Local Number Portability" and "LNP" refer to long-term database methods for number portability, as defined in Subpart C of Part 52 of the FCC's Rules and Regulations, 47 C.F.R, Part 52, Subpart C.

unavoidable. In either event, there should be sufficient time to give appropriate public notice of the discontinuance of permissive 7-digit local calling should the need arise. For example, subsection 52.23(c) of the FCC's rules, 47 C.F.R. § 52.23(c), provides essentially a six-month window for the implementation of LNP by a local exchange carrier following a specific request therefor by another qualified telecommunications carrier. While it may be that, in some areas, the presence of deployed LNP may render permissive 7-digit local dialing infeasible, nevertheless, for those areas in which permissive 7-digit local dialing is feasible, the Companies believe that 7-digit local dialing should be allowed in the public interest. Accordingly, Whidbey and Hat Island encourage the Commission to seek a waiver of the FCC's 10-digit local dialing requirement, so as to permit, but not require, local 7-digit dialing.

DATED: October 18, 1999.

Respectfully submitted,

WHIDBEY TELEPHONE COMPANY  
HAT ISLAND TELEPHONE COMPANY

By Robert S. Snyder  
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