

Agenda Date: June 15, 2023
Item Number: A2

Docket: UT-230108
Company: The North American Numbering Plan Administrator

Staff: Rebecca Beaton, Infrastructure Analyst
Jonathon Church, Regulatory Analyst
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Recommendations

Enter an order, consistent with the Commission's Order 01 in Docket UT-143737, to update the record implementing an all-services area code overlay of the 206 Number Plan Area (NPA) with the 564 NPA. Approve the Washington telecommunication industry's proposed nine-month implementation schedule for the 564 NPA overlay in accordance with relief guidelines.

Background

The North American Numbering Plan Administrator (NANPA) is the third-party independent number administrator for the Federal Communications Commission (FCC). On February 16, 2023, the NANPA filed a petition with the Commission to request the relief of number exhaust in the western Washington 206 Number Plan Area (NPA or area code). Numbers are a public resource and used as new service providers and new services come into existence. The Commission has taken a proactive approach to improving the efficiency with which number resources are used in Washington State and curbing area code exhaust and number depletion in Washington.

The State of Washington has six area codes. These six area codes are 206, 253, 360, 425, 564 and 509. Western Washington has five area codes consisting of 206, 253, 360, 425, and 564.

The area code exhaust date for the 206 NPA was based on a biannual analysis by the NANPA and released by the FCC in its national area code exhaust projection report. On April 24, 2023, the NANPA completed the first quarter 2023 national area code exhaust projection, and the FCC report identified the 206 NPA as nearing resource exhaust. The report confirms the western Washington 206 NPA is projected to exhaust the fourth quarter of 2025.

The NANPA petition, on behalf of the telecommunications industry in Washington state, requests implementation of an overlay of the 206 NPA with the 564 NPA as defined in Order 01 in Docket UT-143787 with revised implementation dates.

The Commission previously determined in Docket UT-991535 that a single area code, 564 NPA, would overlay the existing western Washington 206, 253, 360, and 425 area codes.¹ The Commission approved an overlay area code that would eventually serve all western Washington

¹ Order Implementing Area Code Relief Plan, Docket UT-991535 (May 10, 2000).

geographic areas but did not establish an implementation schedule. The western Washington area code overlay and mandatory ten-digit dialing were later postponed and then suspended due to the success of state number conservation efforts.² On May 6, 2016, the Commission approved the implementation of an overlay of the 360 NPA and ten-digit mandatory dialing in western Washington in Docket UT-143787.³ The order also required a phased in approach of the implementation of the 564 NPA to overlay western Washington NPAs as each area code nears exhaustion and require number resource relief.

Discussion

The Commission determined the need for an area code overlay and ten-digit dialing in all western Washington NPAs in Docket UT-991535. An area code overlay requires mandatory ten-digit dialing.⁴ The prior Commission order found ten-digit dialing in the public interest and implemented this in western Washington in Docket UT-143787 Order 01. Customers have effortlessly adjusted to ten-digit dialing with all-services overlay numbering configurations in Washington and in other regions. The telecommunications industry members have consistently recommended an overlay to implement area code relief.⁵

Commission staff (Staff) does not see any reason to propose a different recommendation for the projected number exhaustion in area code 206. The Commission implemented flexibility to control the distribution of the 564 NPA numbers and to require the use of existing numbers in each western Washington area code until forecasted to exhaust. Based on the projections provided by NANPA and the dispersed area projection exhaust dates for other area codes, Staff and telecommunications industry service providers support the phased in implementation of the 564 NPA as an overlay on the 206 NPA.

Further, the industry providers propose a nine-month schedule, which is consistent with current industry practices for implementing an overlay when mandatory ten-digit dialing is already in place. The proposed implementation schedule does not include specific dates but timeframes to identify the details of the technical and consumer phases of the implementation. Once the Commission has approved the implementation timeline schedule, the industry will select specific dates at a NANPA facilitated meeting with NANPA staff, Commission staff, and industry members to ensure the dates do not interfere with holidays, high traffic calling days, network freeze periods, or other NPA relief implementation activities occurring across the country. Stakeholders, industry members and Commission staff will collaborate on implementation processes, technical and consumer requirements, and media notifications.

² Order Suspending Area Code Relief Plan, Docket UT-991535 (September 5, 2001).

³ Order Implementing Area Code Relief Plan, Docket UT-143787 (May 6, 2016).

⁴ An overlay requires ten-digit local dialing as a federal mandate in 47 CFR 52.19 (3)(ii).

⁵ See FCC Order DA 14-842

The proposed schedule will allow the 564 NPA to be implemented six months prior to the projected exhaust of the 206 NPA in compliance with NPA Relief Guidelines.⁶ The NANPA will post and distribute a public notice and planning letter once the Commission enters an order. This letter will further confirm the 564 NPA will not be available in the 206 NPA until the numbers in the 206 NPA have fully exhausted. This is consistent with actions in UT-143787 Order 01 with the 360 NPA overlay that was completed in 2018.

Staff's recommendations are to retain the existing plan for the 564 NPA overlay of the 206 NPA as defined in Order 01 in Docket UT-143787 and update the Commission record to reflect revised implementation dates. Staff concurs with the industry proposed timeline of nine months for an orderly transition for the technical requirements, network conversions, customer notifications, press releases, letters to industry, and publications.

Conclusion

Staff believes that the industry recommendation by NANPA for the 206 NPA overlay is appropriate and timely to address number exhaust in the Washington state 206 NPA and therefore it is in the public interest.

Staff recommends the Commission enter an order to 1) overlay the 206 NPA with the 564 NPA for the purpose of addressing number exhaust and 2) direct the industry to execute a nine-month implementation timeframe so that the 564 NPA overlay will be completed six months prior to the projected exhaust of the 206 NPA in accordance with NPA Relief Guidelines.

Attachments (1)

⁶ NPA Relief Guidelines, 7.2