

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

In the Matter of the ) DOCKET UT-060012  
Conservation of )  
Numbering Resources ) ORDER 02  
)  
)  
) ORDER IMPLEMENTING  
) MANDATORY THOUSANDS-  
) BLOCK NUMBER POOLING IN  
) THE 509 NUMBER PLAN AREA  
..... )

**OVERVIEW**

- 1 This order mandates thousands-block number pooling in all rate centers in the 509 number plan area or area code to be implemented no later than June 29, 2007.
- 2 Docket UT-060012 presents the Washington Utilities and transportation Commission the opportunity to implement measures to forestall the need to create new area codes within the 509 and 360 area codes. In this order, the Commission adopts one such measure, called “thousands-block number pooling.” The Commission decides to mandate such number pooling within the 509 area code. The Commission addressed the 360 area code in the first order of this docket dated January 24, 2007.

**BACKGROUND**

- 3 On November 9, 2006, the Federal Communications Commission granted this commission’s petition seeking authority to implement mandatory thousands-block number pooling in all rate centers<sup>1</sup> within the 509 and 360 area codes. Prior to the commission’s January 24, 2007, order in this docket, only Washington rate centers designated within a top one hundred metropolitan service area in the nation, were required to number pool.
- 4 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.

5 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.

6 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. Alternative means are available to assure the availability of telephone numbers, delaying the date for creating a new area code.

7 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,” making each one thousand block of telephone numbers available to different telecommunications companies.<sup>2</sup>

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

### JURISDICTION

9 Historically, the Federal Communications Commission (FCC) has had exclusive jurisdiction for allocating telephone numbers for telecommunications companies in this state.<sup>3</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>4</sup>

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<sup>1</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.

<sup>2</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>3</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>4</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,*

## PUBLIC COMMENT

- 10 On February 6, 2007, 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 509 area code. No written comments were filed.
- 11 On March 28, 2007, the Commission received oral comments in this matter. 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

- 12 The FCC's North American Number Plan Administrator estimates that without mandatory number pooling, the need for area code relief in the 509 NPA will arise in the first quarter of 2011.<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 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,

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*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>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.

<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](http://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.

it places a major economic burden on consumers and businesses, as well as less tangible burdens.

- 13 Mandatory number pooling has proven to an effective number conservation tool in Washington and assures optimal conservation of numbering resources.
- 14 The Commission decides that mandatory thousands-block number pooling is appropriate for the rate centers in the 509 area code for which such pooling is currently optional or excluded for thousands-block number pooling by June 29, 2007.
- 15 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.
- 16 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.
- 17 Bi-annual Numbering Resource Utilization/Forecast (NRUF) reporting will be completed on the one thousand block level for all rate centers in the 509 area code.

### FINDINGS AND CONCLUSIONS

- 18 (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.*

- 19 (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>
- 20 (3) This matter was brought before the Commission at its regularly scheduled meeting on March 28, 2007.
- 21 (4) Based on the comments and information filed in this docket, the Commission finds that number pooling in all rate centers in the 509 area code should be mandatory by June 29, 2007.
- 22 (5) Rate centers within the 509 area code, should be designated as mandatory by NeuStar, as the National Pooling Administrator, by June 29, 2007.
- 23 (6) The telecommunications companies holding numbers in the 509 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 sequential telephone numbers within a ten thousand number code, of which the carrier has used one hundred or fewer numbers.
- 24 (7) All numbering resources should be allocated in thousands-blocks within all 509 rate centers, in conjunction with the Pooling Administrator by June 29, 2007.
- 25 (8) Numbering Resource Utilization/Forecast data should be reported for all rate centers in the 509 area code at the thousands-block level.
- 26 (9) All non-paging carriers with numbering resources in the 509 area code should attend industry meetings regarding thousands-block number pooling in the 509 area code as scheduled by the Pooling Administrator.

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

**ORDER**

THE COMMISSION ORDERS:

- 27 (1) All rate centers within the 509 numbering plan area are designated as mandatory  
for thousands-block number pooling by June 29, 2007.
- 28 (2) Non-paging carriers shall ready their inventories to donate uncontaminated  
thousands-blocks, and thousands-blocks that are up to ten percent 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.
- 29 (3) All numbering resources are allocated in thousands-blocks within all rate centers  
in the 509 area code, in conjunction with the Pooling Administrator, by June 29,  
2007.
- 30 (4) Numbering Resource Utilization/Forecast data shall be reported in the 509 area  
code at the thousands-block level.
- 31 (5) All non-paging carriers with numbering resources in the 509 numbering plan area  
shall attend industry meetings regarding thousands-block number pooling in the  
509 numbering plan area, as scheduled by the Pooling Administrator.
- 32 (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.
- 33 (7) The Commission retains jurisdiction over the subject matter to effectuate the  
provisions of this Order.

DATED at Olympia, Washington, and effective March 28, 2007.

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

MARK H. SIDRAN, Chairman

PATRICK J. OSHIE, Commissioner

PHILIP B. JONES, Commissioner