

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

IN THE MATTER OF THE)	DOCKET NO. UT-991627
INVESTIGATION INTO THE ISSUE)	
OF NUMBERING RESOURCES)	ORDER REQUIRING A
.....)	NUMBER POOLING TRIAL
)	IN AREA CODE 509

I. FINDINGS OF FACT

- 1 On July 20, 2000, the Federal Communication Commission (FCC) delegated to the Washington Utilities and Transportation Commission (Commission) authority to implement thousand-number block pooling in Washington. *In re Numbering Resource Optimization Implementation of Local Competition Provisions of Telecommunications Act of 1996*, 2000 WL 991629 (F.C.C., July 20, 2000) (No. DA 00-1616, NSD L-99-100, NSD L-99-82, CC 99-200, NSD L-00-16, NSD L-99-96, CC 99-9698, NSD L-99-98, NSD L-00-08).

- 2 Thousand-number block number pooling involves the sharing of telephone prefixes by more than one telecommunications company offering service in a particular area. The FCC has concluded that pooling is “an important numbering resource optimization strategy, essential to extending the life of the [North American Numbering Plan].” Moreover, the FCC has found that “[d]elaying thousands-block number pooling in the state of Washington has the potential to perpetuate the current numbering crisis in the state of Washington.” *Id.* at 24.

- 3 The Commission’s authority is limited in several ways, including the pace at which it can require companies to implement pooling, the type of companies that can be required to participate, the need to conform to industry-developed pooling guidelines, and the allocation and recovery of costs incurred in such a pooling trial.

- 4 The FCC’s delegation of authority was in response to a petition filed by the Commission on December 10, 1999, which was supplemented on April 27, 2000, in response to the FCC's March 31, 2000, Number Resource Optimization order. *See In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, CC Docket No. 99-200, FCC 00-104 (March 20, 2000).

- 5 In anticipation of the FCC delegation of authority, the Commission on February 23, 2000, directed the telecommunications industry to develop an implementation plan for a number pooling trial. In response to this directive, the Technical Subcommittee of

the Washington Exchange Carrier Association (WECA) submitted its *Generic Pooling Plan for Washington* on September 26, 2000.

- 6 The Commission solicited proposals to serve as the state's interim number pooling administrator. On October 31, 2000, the Commission designated Telcordia Technologies, Inc. for this function.
- 7 At the Commission's November 8, 2000, open meeting the Staff recommended that the Commission order a number pooling trial in the four area codes of western Washington (360, 206, 253, and 425). The Commission heard comments from interested members of the telecommunications industry and took no action on the matter.
- 8 At the Commission's November 29, 2000, open meeting, the Staff presented a revised recommendation to implement number pooling in area code 509. Staff stated four reasons for the change in approach: (a) pooling is likely to be more effective in area code 509; (b) pooling in area code 509 can be implemented on a more reasonable schedule; (c) much of western Washington will be covered by a national pooling plan; (d) the cost of a pooling program will be less in area code 509.
- 9 Staff recommended that the pooling trial begin on July 8, 2001, in the rate centers in the Spokane metropolitan statistical area, which consists of Spokane County. Staff recommended that the Commission address the schedule for pooling in the remainder of area code 509 only if the industry does not voluntarily include it in the initial implementation.
- 10 Staff recommended that number pooling be required only in those rate centers where local number portability is implemented, which is one of the requirements of the FCC's delegated authority.
- 11 The Commission heard comments from Qwest Corporation, Verizon Communications, the Washington Independent Telephone Association, Public Counsel, and the WECA Technical Subcommittee. Qwest opposed Staff's recommendation, and other industry representatives expressed concern about it. Public Counsel urged the Commission to approve the Staff recommendation.
- 12 Qwest stated that the cost of a number pooling trial would be \$28 million and that the FCC's delegation of authority would require the Commission to approve a cost recovery mechanism to charge customers that entire amount. Qwest recommended that the Commission instead require that companies return unused prefixes in area code 509 and delay action on number pooling.
- 13 Staff stated that the Qwest cost numbers have not been supported and that Qwest is attributing to a specific pooling trial in area code 509 costs that it will occur regardless of whether this trial goes forward. Staff recommended that all cost issues be considered after providing interested parties an opportunity to provide comments.

II. CONCLUSIONS OF LAW

14 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.

15 Based on the Commission's findings of fact in this matter, the Commission concludes that a number pooling trial should be implemented in area code 509.

III. ORDER

16 (1) The Commission directs all telecommunications companies with prefixes in rate centers serving the Spokane metropolitan statistical area and with switches capable of local number portability to implement a thousand-number block pooling trial by July 8, 2001.

17 (2) The Commission directs each company subject to this order to cooperate with the designated interim number pooling administrator in implementing the requirements of this order and to fulfill all service provider responsibilities as set out in the WECA number pooling plan.

18 (3) The Commission retains jurisdiction over this matter to issue such future orders and take such future actions as may be appropriate.

DATED at Olympia, Washington, and effective this day of November, 2000.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARILYN SHOWALTER, Chairwoman

RICHARD HEMSTAD, Commissioner

WILLIAM R. GILLIS, Commissioner