

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	
)	
Area Code Relief for the 206, 253, 425)	DOCKET NO. UT-991535
Number Plan Area Filed by NeuStar, for)	
the Washington State Telecommunications)	
Industry in the Form of an Overlay; and)	PETITION FOR LEAVE TO
Creation of the 564 Plan Area for All of)	SUPPLEMENT RECORD
Western Washington)	
_____)	

I. INTRODUCTION AND DISCUSSION

This is filed on behalf of Commission Staff in support of its petition for leave to supplement the record in this case involving the allocation of consumer education costs among telephone companies. In its March 2, 2001, Order Apportioning Costs, the Commission adopted Staff's proposal for funding public information related to the area code overlay proposal. On March 9, 2001, Electric Lightwave, Inc. (ELI) petitioned the Commission for "clarification and/or reconsideration or rehearing" of the Commission's Order. Specifically, ELI requested that the Commission amend its Order "to require that ELI's share of the costs of the public education program be calculated based on 74, rather than 110, NXX codes assigned to ELI in Washington." ELI Petition at 1. Staff notes, however, that ELI was represented by counsel and participated in the Commission's February 23, 2001, hearing on consumer education cost allocation and failed to raise this issue. Therefore, ELI's petition is untimely. Had this issue properly been raised at hearing, there would have been no need for the filing of either ELI's petition or this petition.

Although the Commission has not sought responses to ELI's petition, Commission Staff takes this opportunity to request permission to supplement the record with updated allocation

information that should prove useful to the Commission in its determination of ELI's petition. Staff does not object to the use of updated results in light of the fact that such use will not significantly increase any other company's allocation of costs. Attached to this petition is a spreadsheet depicting the updated allocation of area code 564 public education costs. Staff recalculated the per-prefix and total company amounts based on recent data provided to Staff by the Numbering Administrator. Staff updated the data on March 23, 2001.

II. CONCLUSION

For the above reasons, Commission Staff requests permission to supplement the record to include updated cost allocations to fund public education costs related to the area code overlay proposal.

DATED this 23rd day of March, 2001.

CHRISTINE O. GREGOIRE
Attorney General

SALLY G. JOHNSTON
Senior Assistant Attorney General
Attorneys for Commission Staff