

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION)
OF NEUSTAR, INC. FOR APPROVAL OF) CASE NO. GNR-T-15-06
NPA RELIEF PLAN FOR THE 208 AREA)
CODE) ORDER NO. 33414
)**

On July 21, 2015, Neustar filed an Application seeking approval to implement a “Relief Plan” for Idaho’s 208 area code, which has been projected to run out of available telephone numbers in the second quarter of 2018. Neustar is the neutral third-party administrator of the North American Numbering Plan (“NANP”), and filed its Application on behalf of itself and the Idaho telecommunications industry (“Industry”).¹ Briefly, Neustar proposes to add a new area code to the entire geographic area currently served by the 208 area code, with a 16-month implementation period. The proposed relief plan would require ten-digit dialing for all local telephone calls. The Federal Communications Commission (FCC) has delegated authority to the Idaho Commission to review and approve area code relief plans. 47 C.F.R. § 52.19.

On August 6, 2015, the Commission issued a Notice of Application and Notice of Modified Procedure that set a comment deadline of October 5, 2015. *See* Order No. 33355. The Commission received comments from the Industry representatives, the Idaho Telecom Alliance, Commission Staff, and approximately 40 individuals. Based upon our review of the Application, the different area code options, and the comments, we approve Neustar’s proposed Relief Plan.

THE APPLICATION

The NANP divides the United States into numbering plan areas (NPAs) that are encoded numerically as three-digit prefixes, called area codes. The combination of a three-digit area code and a seven-digit telephone number serve as routing addresses in the public switched telephone network. Neustar serves as the NPA Relief Planner for Idaho. Idaho was assigned the 208 area code in 1947. Application, Exh. B.

Neustar reported that the available pool of telephone numbers in the 208 area code is projected to “exhaust” during the second quarter of 2018. In April 2015, Neustar notified the Industry that NPA relief needed to be addressed for the 208 area code. Thereafter, Neustar

¹ The “Industry” is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 208 area code of Idaho.

conducted a conference call with Industry representatives to discuss relief alternatives. Specifically, two relief options were discussed: (1) overlaying a new area code for all services (“overlay”); and (2) splitting the state into two or more area codes (“split”).

A. The Relief Alternatives

1. Area Code Overlay. By way of background, an overlay “would superimpose a new [area code] over the same geographic area covered by the existing 208 NPA (the entire state of Idaho). All existing customers would retain their [assigned] 208 area code and would not have to change their telephone numbers.” Application at 4. Notably, “however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas.” *Id.* at 3. Neustar calculates that the overlay has a projected life of 66 years. *Id.* at 4.

2. Area Code Split. Under the alternative split plan, Idaho would be divided, or split, into two geographic areas and different area codes would be assigned to the areas formed by the division, with one area retaining the 208 area code, and the other area being assigned a new area code. Splits are intended to equally balance the assigned telephone numbers into two territories. All split plans require ten-digit dialing between the different NPAs. However, seven-digit dialing would be allowed within the each NPA. *Id.* Neustar stated in its Application that “the proposed boundary line [for a split] would run along rate center boundaries starting at the Oregon border between Riggins and New Meadows rate centers and [would continue] east and then turn southward ending at the Nevada border between the Three Creek and Oakley rate centers.” *Id.* at 3-4. The split would create two areas: one generally comprised of southwestern Idaho, and the other area being the remaining parts of the state. According to Neustar, the area north and east of the boundary line has a projected life of 68 years, and the southwestern portion has a projected life of 65 years. *Id.* Neustar has not proposed which geographic area would keep the 208 area code.

After reviewing the options, the Industry representatives (including incumbent local wireline carriers, competitive local exchange carriers, cellular carriers, and broadband carriers), Commission Staff, and Neustar Relief Planning experts, concluded uniformly that the Commission should adopt the all-services overlay with a 16-month implementation schedule.

The recommended transition schedule is as follows:

EVENT	TIMEFRAME	DATE
Total Implementation Period	16 months	-
Start Network Preparation and Customer Education	6 months	TBD
Start of Permissive 7-digit and 10-Digit Dialing Period (Calls within 208 NPA can be dialed using 7 or 10 digits) and continued Customer Education	9 months	TBD
Mandatory dialing at the end of the Permissive Dialing Period during 4Q2017	-	TBD
First Code Activation after end of Permissive Dialing Period (Effective date for codes from new NPA)	1 month	TBD

See Exh. A at 7. Neustar indicates there is some flexibility concerning specific implementation dates on the schedule. Neustar states that serious consideration should be given as to what time of year is best to introduce dialing changes, as well as the length of time to allow for permissive dialing. In particular, Neustar recommended that the transition schedule should avoid major holidays and tourism seasons. Neustar recommended that mandatory dialing begin six months prior to the forecasted exhaust date for the 208 area code, which would be fourth quarter 2017.

THE COMMENTS

A. Staff Comments

Staff recommended the Commission implement Neustar’s proposed plan of an all services overlay. In reviewing national trends, Staff noted that overlay plans have been the preferred alternative for nearly a decade, observing that it has been eight years since a geographic split was last implemented. Staff suggested that time has proven that customers in locations that implement an overlay plan have been able to adjust to ten-digit dialing much more readily than states where a geographic split was used. Staff Comments 4-5. Further, Staff points to West Virginia, where in 2008, the Public Service Commission of West Virginia reversed its decision to implement a geographic split pointing to the economic burden of a split relief plan, and that current technology generally “alleviates most of the problems [associated] with ten-digit dialing.” See *Order to Overlay 304 Area Code*, Case No. 00-0953-T-PC (West Virginia PSC, February 13, 2008) (available at: www.psc.state.wv.us).

Beyond single states, Staff observed that the FCC accepted the recommendation of the North American Numbering Council² to endorse overlay relief plans as a “Best Practice” in

² The North American Numbering Council is a Federal Advisory Committee created to advise the FCC on numbering issues that foster efficient and impartial number administration.

implementing numbering relief. See FCC Order DA 14-842 (June 20, 2014) (*available at https://apps.fcc.gov/edocs_public/attachmatch/DA-14-842A1.pdf*). Overlay relief is deemed a best practice because nationally the vast majority of NPAs require mandatory ten-digit dialing, and because most customers no longer “dial” numbers as most are stored in mobile phones or digital devices, where most calls originate. *Id.*

Looking to the future, Staff pointed out that new technologies such as all internet protocol (“IP”) networks and voice over internet protocol (“VOIP”) telephone services are increasingly utilizing ten-digit dialing. Staff opined that because of these advances, “there will come a time where ten-digit dialing will [always] be required.” Staff Comments 5-6. Likewise, Staff believes that it is beneficial for Idaho to move to ten-digit dialing in anticipation of future technological advances. *Id.*

Staff summarized that an overlay eliminates the need for consumer number changes, treats all consumers equally, is simpler to implement from a technical standpoint, and subsequent relief is more easily implemented through an additional overlay. Staff also recommended that the Commission direct the Industry to initiate a comprehensive educational program to educate Idaho customers of the transition. Accordingly, Staff recommended the Commission approve the all-service overlay presented in the Neustar’s Application.

B. Industry Comments

The Industry uniformly recommended that the Commission implement Neustar’s proposed plan of an all-services overlay. The Industry provided comments in two filings. A coalition of telecommunications carriers³ identifying themselves as the “Joint Telecommunications Carriers” gave comments endorsing the proposed overlay plan. A second group of smaller telecommunications carriers⁴ identified as the “Idaho Telecom Alliance” also filed comments endorsing the overlay plan.

³ The telecommunications carriers collectively referred to herein as the “Joint Telecommunications Carriers” are: AT&T; Teleport Communications America; SBC Long Distance; Cricket Communications; New Cingular Wireless PCS, LLC dba AT&T Mobility; Frontier Communications Northwest; Citizens Telecommunications Company of Idaho; Qwest Corporation dba CenturyLink QC; CenturyTel of Idaho dba CenturyLink; and CenturyTel of the Gem State dba CenturyLink; CenturyLink Communications; Verizon Wireless; MCImetro Access Transmission Services dba Verizon Access Transmission Services; Time Warner Cable Information Services (Idaho) dba Time Warner Cable; Sprint Spectrum; T-Mobile West; and XO Communications Services.

⁴ Albion Telephone Company; CTC Telecom; Custer Telephone Cooperative; Direct Communications; Farmers Mutual Telephone Company; Filer Mutual Telephone Company; Fremont Communications; Inland Telephone Company; MTE Communications; Oregon-Idaho Utilities; and Project Mutual Telephone.

Both sets of the Industry comments noted the drawbacks and advantages of either an overlay or a split plan. Ultimately, however, the carriers are uniform in their recommendation that the Commission approve the overlay plan. They argued that the overlay is the more equitable, least disruptive option, and will best minimize inconvenience and cost to customers. Furthermore, they contend that implementation of an overlay is simpler for the industry due to local number portability rules. Notably, the Joint Telecommunications Carriers stated that they have “become very skilled at educating consumers and businesses to dial 10-digits for local calls.” Joint Telecommunications Carriers Comments at 3.

C. Public Comments

The Commission received 41 written comments from the public. Public comments were mixed, with a preference for a geographic split: 27 were in favor of a geographic split (66%), and 12 favored an overlay (29%). Two commenters proposed options that are technically not achievable.

The customers in favor of the geographic split generally expressed consternation with ten-digit dialing. A number of commenters supporting a geographic split recommended that the 208 area code remain in the Boise/southwest Idaho area due to higher population and business presence. Customers in favor of the overlay plan cite concerns with the estimated costs resulting from a geographic split for businesses including: revising or replacing billing invoices, business cards, advertisement, signage on vehicles, etc. None of the public comments addressed future trends that could end seven-digit dialing altogether.

DISCUSSION AND FINDINGS

The Commission has been proactive in maximizing the life of the 208 area code. Beginning in 2001, the Commission took action to stave off exhaustion of the 208 area code in 2003, including rate center consolidation, mandatory thousand-block-number pooling, and reclamation of unused and uncontaminated numbers from carriers. Order No. 28902. These actions resulted in extending the life of the 208 area code for approximately 15 years. Because of the Commission’s success in conserving the pool of available numbers for the 208 area code, when now confronted with exhaustion, the Commission and the Industry are able to examine the relief alternative with the benefit of copious national data. Our goal is to determine which alternative and transition schedule best serves the public interest of Idaho and its citizens.

The Commission is sensitive to the public comments expressing favor for a geographic split. Neither option is ideal. The overlay will create the need for statewide ten-digit dialing that will cause some difficulties as the public transitions to this new requirement. On the other hand, a geographic split will require about half of all telephone numbers in Idaho to change.

What is more, under a geographic split, businesses of all sizes that must change their telephone area code will experience significant disruptions. Any goodwill of business identification associated with existing phone numbers will be lost. Advertising, letterhead, webpages, and business cards will all require changes. Furthermore, until the old contact information has been replaced and people have internalized the area code change, the public in half the state will be faced with a challenge every time they wish to call a business – a challenge that will likely ripple far beyond any transition period. This is no small expense nor a minor nuisance.

Furthermore, this Commission believes that developing technology and services that utilize telephone numbers will eventually drive seven-digit dialing into obsolescence in the future. Consequently, implementation of a geographic split may only serve to prolong seven-digit dialing for a short period of time. Thus, any future dialing change and relief planning will be eased by the implementation of ten-digit dialing now rather than later. Additionally, it must be noted that the vast majority of phone number dialing is now done automatically by cellular phones, digital devices, and computers, alleviating the need to remember numbers. The Commission sees these trends continuing.

Conversely, an all-services overlay will cause everyone in the state to (equally) incur the annoyance of ten-digit dialing. Beyond this inconvenience, an overlay will not cause a disruption to current phone numbers. The inconvenience caused by ten-digit dialing will be mitigated by education efforts, a permissive dialing period, and the use of automatic dialing through cellular and other digital devices.

After a thorough review of the record in this case, the Commission finds it just and reasonable, and in the public interest to approve implementation of an overlay relief plan for the 208 area code. The Commission finds Neustar's proposed 16-month implementation schedule (including a six-month permissive seven- and ten-digit dialing period) satisfactory when coupled with the consumer education requirements.

O R D E R

IT IS HEREBY ORDERED that Neustar's proposal to implement an all-services overlay and introduce a second area code covering the entire state of Idaho, is approved.

IT IS FURTHER ORDERED that the proposed 16-month schedule to implement use of a second area code, including a six-month permissive seven- and ten-digit dialing period, is approved.

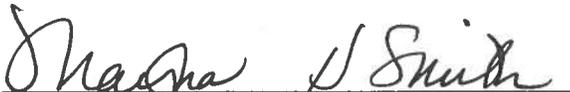
IT IS FURTHER ORDERED that the implementation process shall begin within 30 days of the date of this Order.

IT IS FURTHER ORDERED that Commission Staff shall participate with the Industry and Neustar in the generation of media releases, customer education, community involvement, and public workshops to ensure the rapid and equitable implementation of the plan with adequate customer education.

THIS IS A FINAL ORDER. Any person interested in the Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code* §§ 61-626, 62-619.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 2nd
day of November 2015.


PAUL KJELLANDER, PRESIDENT


MARSHA H. SMITH, COMMISSIONER


KRISTINE RAPER, COMMISSIONER

ATTEST:


Jean D. Jewell
Commission Secretary

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