

Resolution on US Department of Navy NPA 366 Request

WHEREAS, The United State Department of Navy (DON) has submitted an application for the assignment of the area code 366; *and*

WHEREAS, The DON has indicated that the request, if approved, would create a nationwide area code overlay so that all calls to and from the new area code would be treated as local; *and*

WHEREAS, The assignment and implementation of such an area code raises significant potential technical and policy concerns, in areas such as:

- Conformance with existing regulatory requirements;
- Conformance with existing numbering guidelines, policies, and procedures;
- Technical feasibility;
- Impact upon carrier compensation; *and*

WHEREAS, Several industry committees and organizations have identified numerous areas of specific concern, such as:

- Technical implications associated with call routing, number administration, number portability, and geographic scope;
- The imposition of mandatory 10-digit dialing on all local calls throughout the nation, which would negate the work of those States that have determined that 7-digit dialing is in the public interest;
- 911 and E-911 implementation issues including call routing and database integrity;
- Identification and resolution of billing information within established intercarrier compensation regimes;
- Cost mandates imposed on local phone providers and customers required to implement new dialing patterns; *and*

WHEREAS, Because the DON would be turning back 1.4 million current numbers, but encumbering 8 million new numbers, the DON plan is an inefficient use of scarce numbering resources; *and*

WHEREAS, Significant questions remain regarding whether the DON is eligible for its own area code under current law and numbering guidelines; *and*

WHEREAS, The DON request would set a precedent for other non-geographic based entities to petition for their own area codes, which would hasten area code and number exhaust; *now therefore be it*

RESOLVED, That the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened at its February 2005 Winter Meetings in Washington, D.C., urges the Federal Communications Commission to carefully consider the significant impact this decision could have throughout the nation; *and be it further*

RESOLVED, That NARUC urges that any decision made by the FCC be done in full consultation with the States and only after consideration of technical and policy issues by the North American Numbering Council; *and be it further*

RESOLVED, That NARUC opposes the May 2005 timeline for FCC action proposed by the DON as insufficient for a full vetting of the concerns raised by this proposal; *and be it further*

RESOLVED, That if the DON continues to propose the May 2005 timeline or any timeline prior to September 1, 2005 for approval, NARUC urges the FCC to deny the application; *and be it further,*

RESOLVED, That the NARUC General Counsel shall file comments and take appropriate actions to further the intent of this resolution.

Sponsored by the Telecommunications Committee

Adopted by the NARUC Board of Directors February 16, 2005