

Resolution to Adopt a “Best Practices” to Implement a More Ubiquitous 10-Digit Dialing for State Public Utility Commission Efforts

WHEREAS, The telecommunications networks in the United States are currently evolving to all Internet Protocol (IP)-based infrastructure and services. Internet Protocol-based telecommunications services continue to use North American Numbering Plan resources (i.e., telephone numbers) to enable the proper call routing; *and*

WHEREAS, The North America Numbering Council (NANC) developed a Future of Numbering (FON) Working Group (WG) to consider and discuss proposals related to the future of telephone numbers, including the need for national 10-digit dialing to facilitate the IP transition; *and*

WHEREAS, The Alliance for Telecommunications Industry Solutions (ATIS), through its Industry Numbering Committee, previously evaluated issues related to the future of telephone numbers, including rate center consolidation and national 10-digit dialing; and in so doing, identified various consumer and regulatory considerations that State and federal regulators must address (“Technical Report on Nationwide Number Portability Study,” ATIS-1000071 (June 20, 2016)); *and*

WHEREAS, In November 2015, the Chief of the Federal Communications Commission’s (FCC) Wireline Competition Bureau requested that the NANC evaluate certain issues related to Nationwide Number Portability (NNP). In so doing, the FON WG considered 10-digit dialing in relation to NNP and on May 16, 2016, the NANC submitted a report that included a recommendation that consumers may benefit from consistent dialing patterns (i.e., 10-digit dialing) and a finding that States have the authority to provide more uniform and ubiquitous dialing patterns within a given State (“Report on NNP”); *and*

WHEREAS, State public utility commissions have been delegated authority by the FCC to approve and implement the methodology for area code relief; *and*

WHEREAS, Since 2005 there has been only one area code split implemented, while in the same timeframe more than 30 area code overlays have been implemented in the US and Puerto Rico and over this year and next, there will be nine area code overlays implemented, and no scheduled area code splits; *and*

WHEREAS, The All Services Overlay methodology for area code relief requires implementation of 10-digit dialing for all calls within the area served by the affected area codes. The area code split allows for the continued 7-digit dialing for local calls within an area code and requires half of the customers to change the area code of their phone numbers; *and*

WHEREAS, On October 17, 2013, the NANC Chair transmitted to the Chief of the FCC’s Wireline Competition Bureau the concurrence of the NANC with the recommendation of the Local Number Portability Administration (LNPA) WG that the FCC approve the “Best Practice 30 on Area Code Relief Options – All Services Overlay” (Best Practice 30), subject to public review and comment, which acknowledged that the All Services Overlay is the preferred area code relief methodology; *and*

WHEREAS, On June 20, 2014, the FCC adopted an Order (Docket Nos.: WC 07-244; CC 95-

116; and CC 99-200; DA 14-842), that included numerous important updates and revisions to LNPA WG process flows to ensure that consumers benefit from effective and timely porting of telephone numbers between carriers. However, the FCC declined to formally proceed with a rulemaking to specifically address the NANC's recommended LNPA WG Best Practice 30, the NANC's preference for area code overlays over area code splits, thereby, maintaining the FCC's delegated authority giving "[S]tate commissions the discretion to decide how to introduce new area codes within their states"; *and*

WHEREAS, Certain State public utility commissions have ordered implementation of more ubiquitous 10-digit dialing in some or all existing Numbering Plan Area boundaries when ordering an All Services Overlay relief for a specific area code in need of relief, or as a result of only implementing All Service Overlays historically within the State; *and*

WHEREAS, Consumers in other States may similarly benefit from implementation of more ubiquitous 10-digit dialing because past relief activities adopting area code splits resulted in consumers being required to maintain unique and complex knowledge of dialing patterns specific to particular area codes, some within very limited geographic areas and requiring service providers to maintain unique requirements for network management where area code splits were implemented; *and*

WHEREAS, The implementation of more ubiquitous 10-digit dialing: (a) will simplify the dialing of telephone numbers by minimizing call routing issues; and (b) supports the extension of the life of the current North American Numbering Plan by minimizing the need for grandfathered numbers associated with the area code split form of relief; *and*

WHEREAS, State public utility commissions who implement All Service Overlays and more ubiquitous 10-digit dialing may further enable and support a smoother and more efficient transition to all IP network technology within the United States and provide the corresponding consumer benefits; *now, therefore be it*

RESOLVED, That the National Association of Regulatory Utility Commissioners (NARUC), convened at its 128th Annual Meeting in La Quinta, California, urges State public utility commissions, when faced with area code exhaust, to ensure that the NANC's "Report on NNP" and recommended Best Practice 30 "Technical Report on a Nationwide Number Portability Study," are carefully considered so as to avoid known concerns and enable the significant benefits described herein; *and be it further*,

RESOLVED, That NARUC hereby acknowledges that the opportunity to implement more ubiquitous 10-digit dialing during area code relief activities, including the elimination of previous 7-digit dialing patterns, may benefit both consumers and carriers in the transition to all IP network technology.

Sponsored by the Committee on Telecommunications
Recommended by the NARUC Board of Directors on November 15, 2016
Adopted by the NARUC Committee of the Whole on November 16, 2016