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Attorneys for Potlatch Telephone Company
and Troy Telephone Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)
THE NORTH AMERICAN NUMBERING)
PLAN ADMINISTRATOR FOR THE)
APPROVAL OF NUMBERING PLAN)
AREA RELIEF FOR THE 208 AREA)
CODE.)
_____)

Case No. GNR-T-00-36

COMMENTS

BACKGROUND

On October 27, 2000, a Petition for telephone area code relief was filed by NeuStar, Inc., the North American Numbering Plan Administrator (“Administrator”). In its Petition, the Administrator projected that Idaho’s “208” area code would run out of telephone numbers during 2003. In Order No. 28819, the Commission discussed the possibility of a technology-specific overlay as well as two preferred options to effectuate a geographic split of area codes in the event a technology-specific overlay is found to be infeasible or undesirable. The Commission has requested comments regarding the merits of a technology-specific overlay plan and comments regarding the geographic split options by “persons favoring implementation

of a geographic split.” Since Potlatch Telephone Company and Troy Telephone Company (“TDS”) do not favor a geographic split, these comments will be limited to the technology-specific overlay.

COMMENTS

To implement an all-services overlay area code, a second area code would have to be added to the same geographic area as the existing area code. All existing phone numbers would retain the original area code, but new telephone customers for local phone service assigned in the same geographic area would receive the new overlay area code. Thus, no one would have to go through all the expense of printing new stationary and contacting all their customers and friends with their new phone number. Admittedly, however, all telephone calls made in the overlay area would require 1 + 10-digit or 10-digit dialing -- even calls currently dialed with seven-digits in the same area code.

A technology-specific overlay would allow some technologies to keep the current 208 area code while requiring others to change. This option could, for example, allow all wired telephone customers in Idaho to retain area code “208,” while wireless (e.g., cellular) telephones and pagers would have a new area code. This option, if allowed by the FCC, would likely allow wired telephone customers more years of area code stability and would allow several other number conservation efforts time to further expand area code lives. This option might also require 10-digit dialing to differentiate between the two area codes.

The Petition and Industry members have recommended an overlay plan for several reasons. First, as previously noted, existing telephone customers will not need to change their telephone numbers at all. Second, the projected life of an overlay plan is 10 years, which is

probably longer than the expected lives of the other alternatives. Furthermore, an overlay plan does not reduce the geographic size of the NPA.

TDS believes that overlays present the least cost expense for customers. Especially as Universal Service becomes more dependent on affordable rates, this becomes a critical issue. A further factor for consideration is that 10-digit dialing has been implemented in most major metropolitan areas. In fact, 10-digit dialing will be consistently used throughout the country at some point in time. Transition to 10-digit dialing now helps customers when making calls on vacations or on business in other states. Finally, where 10 digit dialing has been implemented, most customers adapt over a couple of weeks. LECs provide an intercept message reminding customers to dial the area code. In practice, there has been little customer confusion.

In the case of a geographic split, all customers assume they will be the ones to retain their existing telephone numbers. It is much more difficult to remember and reprogram full new telephone numbers than to add an area code in front of something that is already known. While there has been some public reaction favoring the geographic split, the 111 customers filing comments to date may not all live where 208 will stay in place.

Based on the foregoing reasons, TDS urges the Commission to approve an overlay plan for Idaho.

RESPECTFULLY SUBMITTED this 13th day of September, 2001.

MOFFATT, THOMAS, BARRETT, ROCK &
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By _____
Morgan W. Richards - Of the Firm
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of September, 2001, I caused to be served a true copy of the foregoing **COMMENTS** by the method indicated below.

Jean Jewell	<input type="checkbox"/> U.S. Mail, Postage Prepaid
Commission Secretary	<input type="checkbox"/> Hand Delivered
Idaho Public Utilities Commission	<input type="checkbox"/> Overnight Mail
Post Office Box 83720	<input type="checkbox"/> Facsimile
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Joe Cocke	<input type="checkbox"/> U.S. Mail, Postage Prepaid
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North American Numbering Plan Administrator	<input type="checkbox"/> Overnight Mail
1445 E. Los Angeles Avenue, Suite 301-N Simi Valley, CA 93065	<input type="checkbox"/> Facsimile

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