



exhaustion of the North American Numbering Plan ("NANP"). If the NANP exhausts prematurely, one or more digits may have to be added to the current ten-digit dialing pattern. Such an expansion could take up to 10 years and cost between 50 and 150 billion dollars. NANP exhaust would be greatly accelerated if every state were to implement a three-way geographic split when growth only justifies a two-way geographic split.

In addition, ordering a three-way geographic split that does not conform to industry guidelines will require action by the Federal Communications Commission (FCC), thereby further delaying the implementation of area code relief in Idaho. In its previous comments, AT&T Wireless urged the Commission to move ahead with timely area code relief, so as not to jeopardize the citizens of Idaho from receiving telecommunications services from their carrier of choice. As the Commission correctly recognized in its Order, "[w]e are aware that NeuStar may reject our three-way split relief plan because the projected exhausts of the three regions do not balance within 10 years as required by the FCC's industry numbering guidelines." As justification for its decision the Commission in its Order cites two other states, Missouri and Florida, that have petitioned the FCC to release a code even though it did not meet industry guidelines. Both of these cases, however, involved two-way geographic splits, not a completely unnecessary and unwarranted use of a second area code for a three-way geographic split. As the Commission anticipated NeuStar rejected its request for two new area codes. If the Commission wishes to pursue a three-way geographic split it will have to petition the FCC, which in turn will jeopardize the timely implementation of area code relief in Idaho.

Finally, the Commission did not provide parties with an adequate opportunity to comment on a three-way geographic split. In fact, AT&T Wireless did not believe that the three-way split was even a possibilities under serious consideration. There was only one three-way geographic split proposed (Option #8) in the Notice, which was different that the three-way geographic split adopted by the Commission in the Order. In the Notice, the Commission itself reached a preliminary conclusion rejecting the only three-way geographic split proposed citing several things that made it less desirable including "use an unnecessary third area code". After reaching this conclusion, the Notice directed commenters to focus on relief Options Nos. 1 and 2 - both of which are two-way geographic splits. The Commission never issued a subsequent request for comments on the three-way geographic split that was ultimately adopted in the Order. Although AT&T Wireless, as stated above, strongly believes it is inappropriate to implement a three-way geographic split in Idaho, if in fact the Commission wants to pursue this option, the Commission must allow parties an adequate opportunity to comment on the proposal.

#### Conclusion

For the foregoing reasons, AT&T Wireless respectfully requests that the Commission reconsider its decision to implement a three-way geographic area code split for area code relief in 208.

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