

LISA D. NORDSTROM
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0314
IDAHO BAR NO. 5733

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5983

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE PETITION OF THE)
NORTH AMERICAN NUMBERING PLAN) CASE NO. GNR-T-00-36
ADMINISTRATOR FOR THE APPROVAL OF)
NUMBERING PLAN AREA RELIEF FOR THE) SUPPLEMENTAL
208 AREA CODE.) COMMENTS OF THE
) COMMISSION STAFF
)
)
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COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Lisa D. Nordstrom, Deputy Attorney General, and submits the following comments to supplement its comments previously filed on September 13, 2001, in this case.

Under Federal Communications Commission (FCC) guidelines, telecommunication carriers that hold NXX blocks (prefixes) in Idaho file semi-annual reports to the North American Numbering Plan Administrator (NANPA) regarding prefix assignments and utilization.¹ From these reports and other research, Staff submits the following information that may be of use in determining an area code relief method for the state.

1. Prefix Assignments

From January 2000 through October 2001, one hundred prefixes have been assigned in Idaho. Of those, approximately 45% were assigned to wireless companies, 45% were assigned

¹ Number Resource Utilization and Forecast (NRUF) reports are required by FCC 00-104, *Numbering Resource Optimization First Report and Order*, rel. March 31, 2000.

to competitive local exchange carriers (CLEC), and 10% were assigned to incumbent local exchange carriers (ILEC). Geographically, thirty-one of those prefixes were assigned in the Boise Metropolitan Statistical Area (Ada and Canyon counties). Thirty-six prefixes were evenly assigned to the combined rate centers of Pocatello, Idaho Falls, Coeur D' Alene, Twin Falls, and Lewiston.

2. Number Utilization

Utilization of telephone numbers within a prefix varies widely among Idaho communities and companies. Companies that serve small rural communities or are new to the telecommunications market often report utilization of 1-10%. However, it is not uncommon for companies that serve larger Idaho communities to report utilization of 40-50%. Idaho's overall utilization percentage is 37%.

3. Rate Center Consolidation

Qwest Corporation has recently updated its proposal for Rate Center Consolidation in Case No. USW-T-99-21. Qwest now proposes to consolidate forty-four Idaho rate centers into eight rate centers. Had this consolidation been in place since January 2000, Staff estimates that only five prefixes would have been conserved. Although rate center consolidation offers little relief on its own, it is the foundation for effective thousands-block number pooling in that more prefixes will be made available for pooling among participating carriers in rate centers. Number pooling, if timely implemented, could effectively forestall the exhaust of "208".

4. Number Pooling Rollout

The FCC recently proposed a thousands-block number pooling rollout schedule for the entire nation.² According to the proposed schedule, thousands-block pooling will reach the Boise Metropolitan Statistical Area in March of 2003. As currently projected, pooling would reach Idaho two months **after** mandatory dialing of the new area code would begin. The Idaho Public Utilities Commission submitted comments to the FCC on November 6, 2001, and requested that thousands-block pooling be implemented sooner than the proposed rollout schedule in order to postpone the exhaust of "208." However, if pooling does not reach Idaho in time to forestall the exhaust of "208," Staff continues to recommend that the Commission adopt geographic split Option #1.

² Public Notice DA 01-2419, October 17, 2001, CC Docket No. 99-200.

Respectfully submitted this

day of November 2001.

Lisa D. Nordstrom
Deputy Attorney General

Technical Staff: Doug Cooley

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