



1200 G Street, NW
Suite 500
Washington, DC 20005

P: 202-628-6380
F: 202-393-5453
W: www.atis.org

ATIS Board Officers

Chair
Stephen Bye
Sprint

First Vice Chair
Marian Croak
AT&T

Second Vice Chair
Thomas Sawanobori
Verizon

Treasurer
Joseph Hanley
Telephone and Data
Systems

President & Chief
Executive Officer
Susan M. Miller
ATIS

January 29, 2014

Via Email

Henning Schulzrinne
Chief Technology Officer
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Update on ATIS INC Numbering Analysis

Dear Dr. Schulzrinne:

On behalf of its Industry Numbering Committee (INC), the Alliance for Telecommunications Solutions (ATIS) would like to thank you for meeting with INC on December 12, 2013 to discuss the PSTN transition to an all-IP environment, and for sharing your presentation and insights.

ATIS INC has been working to address the issues you raised, including nationwide 10-digit dialing. As a first step, INC has prepared the attached information as well as an industry recommendation on this issue.

Future updates also will be provided as they become available on INC's efforts to address other issues discussed during the December meeting. ATIS looks forward to further dialogue with you on these matters. INC would welcome your participation at future meetings. We have a meeting scheduled in the Washington DC area for February 4-7, and would be interested in reviewing the analysis with you and answering any questions that you might have. INC also has a meeting scheduled for March 24-26, 2014. Please let us know whether you would be interested in attending these meeting and continuing the dialogue.

Thank you for providing us the opportunity to address these important industry issues. If you have any questions or concerns regarding the material provided, please feel free to contact me.

Sincerely,

Thomas Goode
ATIS General Counsel

The Path to a Uniform Dialing Plan: Nationwide 10-Digit Dialing

The nation is already on a path towards mandatory 10-digit local dialing

The nation is already making good progress in moving toward a consistent 10-digit dialing plan, as area code overlays have become the prevalent method of area code relief¹ implemented for almost a decade. Some facts about overlays and mandatory 10-digit local dialing² include:

- 30 state regulatory commissions and Puerto Rico have ordered overlays and the requisite mandatory 10-digit local dialing.
- 25 state regulatory commissions and Puerto Rico have overlays and 10-digit local dialing already implemented.
- Another 4 states will have implemented their first overlays and 10-digit local dialing by the end of 2014.
- No geographic split has been implemented since October 2007.
- 5 states and Puerto Rico have statewide 10-digit local dialing in place already through overlays;
- By the end of 2014, 90% of Canada's area codes will have 10-digit local dialing, leaving only four area codes remaining with 7-digit local dialing. The Dominican Republic has nationwide 10-digit local dialing implemented.
- By the end of 2014, 39% of the 308 area codes implemented in the US and its territories will have mandatory 10-digit dialing³ in place. Many of these area codes serve large metropolitan areas with considerable consumer populations that have easily adjusted to 10-digit dialing already (e.g. Atlanta, Boston, Chicago, Dallas, Denver, Houston, Miami, Philadelphia, and portions of the Los Angeles and New York City areas).

Consumers prefer overlays and 10-digit local dialing when area code relief is needed

The Industry has been very successful in recent years in educating consumers and regulatory commissions alike in realizing the benefits of overlays. Overlays eliminate the need for consumer number changes, treat all consumers fairly, are simpler to implement from a technical standpoint, and subsequent relief is easily implemented when needed through an additional overlay. Because mandatory 10-digit local dialing is a federal requirement for overlays, overlays essentially pave the way for an eventual nationwide 10-digit dialing plan.

¹ State Commissions have delegated authority to resolve matters involving the introduction of new areas codes within their states; these decisions also impact dialing plans. See 47 CFR § 52.19 (a).

² 47 CFR § 52.19 (c)(3)(ii).

³ As of January 9, 2014, 88 of the 113 area codes (78%) require 10-digit local dialing, and the other 25 of the 113 area codes (22%) require 1+10 digit local dialing. Another 8 area codes will have 10-digit local dialing by December 31, 2014. See <http://www.nationalnanpa.com/enas/npaDialingPlansReport.do> and <http://www.nationalnanpa.com/enas/npasRequiring10DigitReport.do>.

Positive consumer sentiments in recent overlay decisions demonstrate that the majority of consumers providing input much prefer overlays and adapting to 10-digit local dialing over the significant cost and inconvenience of changing their telephone numbers:

- In the October 23, 2013 [decision](#) regarding relief of the 615 area code (Docket No. 11-00018), the Tennessee Regulatory Authority's Order states that it received approximately 3,000 total responses to the area code survey. Of those responses, 83.2% preferred an all-services distributed overlay.
- In its December 11, 2013 [press release](#) regarding relief of the 740 area code (Case No. 13-700-TP-COI), the Public Utilities Commission of Ohio noted that its public surveys showed 70% in favor the overlay.
- In the December 19, 2013 [decision](#) regarding relief of the 415 area code (Decision 13-12-055), the California Public Utilities Commission noted that it received input via e-mail and its web site with 87% supporting the overlay.

In recent years, consumers and their respective carriers have been increasingly opposed to any number changes that would result from a geographic split, to the point that they have successfully convinced state commissions to overturn split decisions in favor of overlays, despite an overlay's requirement for mandatory 10-digit dialing. For example:

- In the July 12, 2007 [decision](#) regarding relief of the 801 area code (Docket No. 07-999-01), the Public Service Commission of Utah rescinded and vacated its previous Order for a geographic split and approved an overlay instead.
- In the February 13, 2008 [decision](#) regarding relief of the 304 area code (Case No. 00-0953-T-PC), the Public Service Commission of West Virginia reversed its previous Order for a geographic split and approved an overlay instead.
- In the October 16, 2008 [decision](#) regarding relief of the 760 area code (Decision 08-10-038), the California Public Utilities Commission vacated its previous Order for a geographic split order and approved an overlay instead.

Consumers readily adapt to mandatory 10-digit local dialing when overlays are implemented because dialing 10 digits is easy to understand, and the Industry voluntarily works together to ensure consumers are educated and well-prepared for the 7- to 10-digit dialing transition. Many consumers do not “dial” digits today, but simply select a contact name in their devices which performs the “dialing” for them.

Re-introducing 7-digit dialing is a step backwards

Re-introducing 7-digit dialing in areas where 10-digit dialing is already in place is a step backwards and requires significant man-hours and investments already spent in eliminating 7-digit dialing to be spent again in re-instating 7-digit dialing. For example, reverting back to 7-digit dialing would be:

- Confusing to consumers who have previously been educated to dial 10 digits on all local calls.
- Frustrating to consumers who experience delayed completion of calls or even uncompleted calls altogether because of the introduction of post-dial timing delays.
- Technically difficult for carriers to support in equipment where hardware and/or software to (re-)introduce 7-digit dialing may not be readily available or has been discontinued.
- Costly for carriers to invest in older equipment that would not otherwise be necessary.
- Costly for carriers from the perspective of considerable dollars previously spent educating consumers on 10-digit dialing.

Recommendation for eventual migration to a national 10-digit dialing plan

INC recommends that the Industry continue to deploy mandatory 10-digit dialing on a structured and consumer-friendly basis as area code relief is needed and overlays are implemented. This natural progression to national 10-digit dialing does not preclude the transition to an all IP network from moving forward. Overlays are the preferred⁴ and prevalent form of area code relief today, and their continued implementation in the future will pave the way for an eventual nationwide and standard 10-digit dialing plan. At the point when the vast majority of dialing plans are mandatory 10-digit dialing, the FCC should then complete the progression with a mandate to bring the small number of remaining area codes and customers into accord with the rest of the nation by requiring a transition to the standard 10-digit local dialing plan.

⁴ The North American Numbering Council (NANC) recently endorsed overlays as an industry best practice, and the FCC recently requested comment on the NANC-supported Best Practice #30. See [DA-13-2367A1.doc](#).