

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Resource Optimization	)	<b>CC Docket No. 99-200</b>
	)	

**PETITION BY THE MAINE PUBLIC UTILITIES COMMISSION  
FOR ADDITIONAL DELEGATED AUTHORITY TO IMPLEMENT NUMBER  
OPTIMIZATION MEASURES IN THE 207 AREA CODE  
AND COMMENTS IN SUPPORT OF THE PETITION BY  
THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION FOR ADDITIONAL  
DELEGATED AUTHORITY TO IMPLEMENT NUMBER OPTIMIZATION  
MEASURES IN THE 603 AREA CODE**

On April 26, 2019, the New Hampshire Public Utilities Commission ("NHPUC") filed a request with the Federal Communications Commission ("Commission" or "FCC") for additional delegated authority to implement individual telephone number ("ITN") pooling on a trial basis. The Maine Public Utilities Commission ("Maine" or "MPUC") fully supports the NHPUC's efforts to implement telephone number conservation measures to conserve the 603-area code, and requests that the Commission grant Maine immediate relief to implement ITN pooling for Maine's 207-area code.

Like New Hampshire, Maine was part of the effort that helped initiate 1,000-block pooling in the early 2000s. Maine worked with a coalition of small and large states to help initiate 1,000-block pooling to conserve numbers, and this system has extended the life of Maine's single area code: 207. Although 1,000-block pooling proved to be a successful stop-gap measure, Maine now finds itself in a situation where there are many underutilized 1,000-blocks in circulation, and a fast-approaching exhaust date for 207.<sup>1</sup>

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<sup>1</sup> For example, the Fort Fairfield rate center has three NXX Codes representing 30,000 possible numbers but has only five percent utilization. In fact, there are 15 1000-blocks currently available in this rate

With many new voice service providers entering Maine for the first time, and others expanding their footprint, Maine finds itself in the position where voice service providers are requesting 1,000-blocks in rate centers where the amount of assigned *individual telephone numbers* is quite low, but the amount of assigned *1,000-blocks* is relatively quite high.<sup>2</sup>

To better put in perspective Maine's challenge and the inefficiency of today's 1,000-block system, the MPUC would like to direct the Commission to some remarkable figures provided by the North American Numbering Plan Administrator's ("NANPA") March 2019 Numbering Resource Utilization/Forecast Report ("NRUF"). According to the Number Planning Area ("NPA") Utilization by Rate Center Summary Report, Maine has 247 Rate Centers and of those, 168 rate centers are utilizing less than 20 percent of the blocks/codes issued to them, and 73 of 247 rate centers are utilizing five percent or less of the blocks/codes issued to them.

Maine's 207 area code is moving closer to exhaust. According to the April 2019 NRUF and NPA Exhaust Analysis, Maine's area code exhaust date has moved from the 4<sup>th</sup> Quarter of 2027 to 2<sup>nd</sup> Quarter of 2026. While the MPUC is vigilant in trying to reduce the release of unnecessary NXX codes into circulation, it has been a challenging task. For example, the demand for numbers in the Portland, Maine rate center has been so high that it has required eight new NXX codes within the past five years. More ominously, a review of the April 2019

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center according to NRUF. According to the latest US Census information, the town of Fort Fairfield has a population of 3,367 people.

<sup>2</sup> In the popular tourist destination of Bar Harbor, home to Acadia National Park, the MPUC recently received notice that a new NXX code needed to be furnished for the Bar Harbor rate center by an existing provider that was running low on numbers. Bar Harbor has two NXX codes and is running at about 45 percent utilization. There are currently enough unused numbers available within this rate center to meet the providers request, however all the numbers that are available are in tainted blocks. Thus, despite five blocks in this rate center with less than 15 percent utilization, a new NXX code will likely be triggered to meet the provider's request.

NANPA Central Office Code Assignment Activity Records suggests that Maine has only 68 NXX codes or 680,000 new numbers available to it before exhaust.

While this petition focuses on implementing ITN pooling on a trial basis in Maine and NH, we believe that the trial could help generate interest in a broader implementation that would benefit the NANP as a whole; the inefficient use of block numbers is not just a problem in Maine and New Hampshire, but also in states with multiple area codes. While the potential exhaust of the larger North American Numbering Plan system may not be in sight for another two decades, the implementation of ITN pooling as the NHPUC outlines would undoubtedly push out that exhaust date out by many years.

In conclusion, Maine's 207 area code is a strong part of our state's identity. Extending the life of 207 would be beneficial to Maine citizens, and the current 1000-block regime is not an efficient use of numbering resources as demonstrated by the millions of numbers in the 207-area code currently available, but ineligible for release back into the numbering pool. Accordingly, the MPUC respectfully requests that the Commission grant the petitions filed by New Hampshire for additional delegated authority to implement ITN pooling on a trial basis and include Maine as part of the trial.

Respectfully submitted,



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