

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

In the Matter of)
Numbering Resource Optimization)

CC Docket No. 99-200

PETITION BY THE MAINE PUBLIC UTILITIES COMMISSION
TO DIRECT THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR TO
REPORT ON THE TECHNICAL, OPERATIONAL, AND COST REQUIREMENTS TO
IMPLEMENT NUMBER OPTIMIZATION MEASURES IN THE 207 AREA CODE

The Maine Public Utilities Commission (“MPUC”) requests that the Federal Communications Commission (“Commission” or “FCC”) direct the North American Numbering Plan Administrator (“NANPA”) to report back to the Commission as soon as practical about the technical, operational, and cost requirements to implement individual telephone number (“ITN”) pooling on a trial basis. The MPUC further requests that, if found to be practical by NANPA, the Commission immediately grant its previous request to implement a trial for ITN pooling for Maine’s single area code: 207.

I. BACKGROUND

On June 26, 2019, the MPUC filed a petition with the FCC joining a request by the New Hampshire Public Utilities Commission (“NHPUC”) seeking to implement ITN pooling on a trial basis.¹ At that time, rate center utilization data from NANPA indicated that number utilization in the 207 area code was only 37%, but that the area code was still moving closer to exhaust in 2026.² No formal action on the petitions of the MPUC and the NHPUC has been taken by the FCC.

¹ 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, *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200 (June 26, 2019).

² April 2019 NRUF and NPA Exhaust Analysis stated that Maine’s Area Code would exhaust in the 2nd Quarter of 2026

II. COMMENTS AND PETITION

While the MPUC has waited for the FCC to consider our earlier petition, we have worked tirelessly with carriers on mitigation strategies. Those strategies have resulted in carriers returning more than 600,000 numbers to the numbering pool from unused or slightly contaminated blocks in accordance with 47 C.F.R. § 52.20(c). In addition, the MPUC has worked with carriers to return two 10,000 block NXX Codes. Despite the MPUC's best efforts working collaboratively with carriers the 207 area code continues to move closer to exhaust; the latest estimates predict that a second area code will need to be implemented in Maine by the 4th Quarter of 2024³. While the implementation date continues to accelerate the latest rate center number utilization data from NANPA still matches the 37% utilization data when the MPUC filed its petition with the FCC in 2019.

For the MPUC, this suggests that no matter how many blocks of numbers carriers return to the 207 pool, the availability of NXX codes is the most significant factor for determining that an area code nears jeopardy. In the view of the MPUC, should the FCC approve ITN it is likely the 207 area code could be extended for an indefinite period of time and the need for a second Maine area code would be unnecessary for the foreseeable future.

In the Docket containing the NHPUC's and MPUC's 2019 petition, some commenters from the industry were quick to dismiss the idea of ITN out of hand without any factual basis. The MPUC agrees, however, that it is reasonable to collect additional data concerning the specifics involved for NANPA, carriers, and the industry at large to implement ITN. The MPUC believes that NANPA is best suited to research and report the technical and operational requirements; and overall costs involved to implement a pilot program for ITN. Time and again,

³ https://www.nationalnanpa.com/reports/reports_npa.html

the industry has proven that it can meet great technical challenges, including the implementation of 1,000-block pooling in the early 2000s and the recent enactment of the 988 Suicide Hotline requiring 82 area codes be moved from seven-digit dialing to 10-digit dialing in 36 states in a short period of time. Accordingly, the MPUC petitions the FCC to direct NANPA to research and report on the technical and operational requirements and overall costs involved to implement a pilot program for ITN in Maine and New Hampshire.

The 207 area code is intrinsically tied to Maine's culture and economy. The MPUC understands that for many larger states it is now commonplace to introduce a new area code when needed. However, for the dwindling number of smaller states like Maine, where a single area code is a point of pride and identity, it seems wholly unnecessary to implement a new area code when only 37% of the telephone numbers in 207 are in use. If the FCC approves an ITN pilot in Maine and New Hampshire and ITN proves to be a viable option, the pilot could then offer a roadmap to improve the overall efficiency of the North American Number Plan ("NANP") which itself could reach exhaust sometime after 2050. The NANP will remain under tremendous stress to meet the growing needs for numbers from new and existing carriers as more devices need numbers in conjunction with the Internet of Things. The MPUC believes that NANP should become nimbler and be able to accommodate requests for one number as easily as requests for 1,000 and that 37% actual usage should not require an additional area code.

III CONCLUSION

The MPUC respectfully requests that the Commission consider our pending 2019 petition, and direct NANPA to research and report on the technical and operational requirements and overall costs involved to implement a pilot program for ITN in Maine and New Hampshire.

Respectfully submitted,

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