

## DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL**

**FROM: BRANDON KARPEN  
DEPUTY ATTORNEY GENERAL**

**DATE: JULY 24, 2015**

**SUBJECT : 208 AREA CODE RELIEF PLAN, CASE NO. GNR-T-15-6**

On July 21, 2015, Neustar filed an Application seeking approval to implement a “Relief Plan” for the 208 area code, which has been projected to run out of available numbers in mid-2018. Neustar makes this application in its capacity as the administrator of the North American Numbering Plan (“NANP”), and on behalf of the Idaho telecommunications industry (“Industry”).<sup>1</sup> Neustar’s proposed Relief Plan includes the addition of a new area code overlaying the geographic area currently served only by the 208 area code, with a 16-month implementation period. The overlay relief plan requires ten-digit dialing for all telephone calls.

Neustar is represented by non-Idaho attorney Kimberly Miller, and local counsel Mary Hobson. Miller has filed a Petition for Limited Admission to appear before the Commission and has also requested that local counsel be excused from attendance at any proceeding before the Commission. Miller has been granted *pro hac vice* admission by the Idaho State Bar to participate in this matter on behalf of Neustar.

### THE APPLICATION

The NANP divides territory under its management into numbering plan areas (NPAs) that are encoded numerically as three-digit prefixes, called area codes. The combination of a three-digit area code and a seven-digit telephone number serve as a routing address in the public switched telephone network. Neustar serves as a neutral third-party NPA Relief Planner for Idaho under the NANP.

---

<sup>1</sup> Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 208 area code of Idaho.

In April 2015, Neustar reported that the 208 NPA is projected to exhaust during the second quarter of 2018. Due to the projected exhaust of numbers, Neustar notified the Industry on April 14, 2015, that NPA relief needed to be addressed. On June 9, 2015, Neustar conducted a conference call with Industry representatives to discuss relief alternatives. Specifically, two relief options were discussed: (1) overlaying a new area code for all services (“Overlay”); and (2) splitting the state into two or more area codes (“Split”).

The Overlay “would superimpose a new NPA over the same geographic area covered by the existing 208 NPA. All existing customers would retain the 208 area code and would not have to change their telephone numbers.” Application at 4. Notably, “however, ten-digit local dialing would be required by all customers within and between NPAs in the affected rate areas.” *Id.* at 3. Neustar claims that the Overlay has a projected life of 66 years. *Id.* at 4.

Conversely, in a Split, Idaho would be split into two or more geographic areas and new NPAs would be assigned to the areas formed by the split, and one area would retain the 208 NPA. All split plans require ten-digit dialing between different NPAs. However, within the same NPA, seven-digit dialing would be permitted. *Id.* Neustar stated in its Application that “the proposed boundary line would run along rate center boundaries starting at the Oregon border between Riggins and New Meadows rate centers and [would continue] east and then turn southward ending at the Nevada border between the Three Creek and Oakley rate centers.” *Id.* at 3-4. According to Neustar, the area north and east of the boundary line has a projected life of 68 years, and the southwestern portion has a projected life of 65 years. *Id.* Neustar has not proposed which geographic area would keep the 208 area code.

During the June conference call, Industry representatives discussed the attributes of both alternatives. Participants on the conference call included incumbent local exchange carriers, competitive local exchange carriers, cellular carriers, broadband carriers, Commission Staff, and Neustar Relief Planning experts. See Exhibit A at 9. At the conclusion of the call, a consensus was reached to recommend that the Commission adopt the all-services overlay with a 16-month implementation schedule.

The recommended schedule is as follows:

<b>EVENT</b>	<b>TIMEFRAME</b>	<b>DATE</b>
Total Implementation Period	16 months	-
Start Network Preparation and Customer Education	6 months	TBD
Start of Permissive 7-digit and 10-Digit Dialing Period (Calls within 208 NPA can be dialed using 7 or 10 digits) and continued Customer Education	9 months	TBD
Mandatory dialing at the end of the Permissive Dialing Period during 4Q2017	-	TBD
First Code Activation after end of Permissive Dialing Period (Effective date for codes from new NPA)	1 months	TBD

Neustar has indicated that there is flexibility as to when the Commission assigns implementation dates on the schedule. See Exhibit A at 7. Neustar has encouraged the Commission to give serious consideration as to what time of year is best to introduce dialing changes, as well as the length of time to allow for permissive dialing. Neustar recommends that the Commission should try to avoid major holidays and tourism seasons. Finally, Neustar recommends that mandatory dialing begin six months prior to forecasted exhaust for the 208 NPA, which would be fourth quarter 2017.

Neustar has requested that this Application be processed under Modified Procedure.

#### **PETITION FOR LIMITED ADMISSION**

In a separate filing, Neustar's attorney of record Kimberly Miller filed a petition requesting that the Commission grant her limited admission. The local counsel associated with this Motion is Idaho attorney Mary Hobson.

Miller has been admitted by the Idaho State Bar under Bar Rule 227, has certified that she is an active member in good standing with the District of Columbia Court of Appeals, and that she maintains a regular practice of law with Neustar, Inc. in Washington, D.C. Both Hobson and Miller have further acknowledged that as local counsel, Hobson's attendance shall be required at all proceedings before the Commission in which Miller appears, unless specifically excused by the Commission. Neustar also requested that Hobson be excused from attendance at any proceeding before the Commission in this matter.

#### **STAFF RECOMMENDATION**

Staff recommends the Commission issue a Notice of Application and Notice of Modified Procedure establishing a 60-day comment period to process the Application. Staff

further recommends that the Commission grant Miller's Petition for Limited Admission and Neustar's request that local counsel be excused from proceedings before the Commission.

**COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application and Notice of Modified Procedure establishing a 60-day comment period to process Neustar's Application? Does the Commission wish to grant limited admission to Kimberly Miller and excuse local counsel from attending proceedings before the Commission in this matter?

*Brandon Karpen*  
Brandon Karpen  
Deputy Attorney General

M:GNR-T-15-06\_bk