



an all-services distributed overlay and the NANPA's suggested timeline for planning and implementation. However, the DOC also recommended that the Commission (1) require permissive 1+10 digit dialing for the completion of local calls, unless a carrier seeks and obtains a waiver from this requirement from the Commission (Recommendation 1.b.), and (2) adopt standardized language for call-intercept messages, requiring the industry to submit proposed language to be approved by the Commission's Executive Secretary (Recommendation 1.c). These two recommendations impose undue burdens on carriers without creating a meaningful benefit to consumers.

### **Discussion**

#### **I. Requiring Permissive 1+10 Digit Dialing for Local Calls Is Unnecessary and Potentially Burdensome**

In its comments, the DOC recognized that mandatory 10-digit dialing is already required in the 218 and 952 NPAs in Minnesota due to the implementation of "988" to reach the 988 Suicide and Crisis Lifeline. Telecommunications carriers operating in the 218 and 952 NPAs implemented 10-digit local dialing in those NPAs in accordance with NANPA Planning Letter 556 (the "988 Planning Letter"),<sup>3</sup> in which the Dialing Plan specified mandatory 10-digit local dialing but left it to each carrier's discretion to implement permissive 1+10-digit local dialing.<sup>4</sup> Implementation of permissive 1+10-digit dialing when mandatory 10-digit dialing is implemented is an industry best practice, and it is what NANPA's petition for relief for the 507 NPA recommends, while still giving the carriers discretion and flexibility. But the DOC recommends that each carrier be *required* to implement permissive 1+10-digit dialing, unless that carrier seeks and obtains a waiver of the requirement from the Commission. Requiring

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<sup>3</sup> See NANPA Planning Letter 556 published January 8, 2021, available at [https://www.nationalnanpa.com/pdf/PL\\_556.pdf](https://www.nationalnanpa.com/pdf/PL_556.pdf).

<sup>4</sup> See the Dialing Plan on Page 4 in NANPA Planning Letter 556, available at [https://www.nationalnanpa.com/pdf/PL\\_556.pdf](https://www.nationalnanpa.com/pdf/PL_556.pdf).

carriers to implement permissive 1+10-digit dialing is unnecessary and potentially burdensome.

Some carriers may have technical limitations or business reasons that prevent it. Requiring carriers to document these limitations and to seek waivers from the Commission could unnecessarily delay and complicate implementation of the overlay for some carriers, particularly if the waiver request were to be denied. Further, requiring carriers to implement permissive 1+10-digit dialing in the 507 NPA when they may have opted not to implement it in the 218 and 952 NPAs, an option allowed under the 988 Planning Letter, could result in inconsistent, more complicated, or costly implementations within a carrier's network. Following implementation of the 988 Planning Letter, consumers are already demonstrating they are able to navigate any difference in calling requirements among carriers.

It is likely that many carriers will implement permissive 1+10-digit dialing regardless, because it is an industry best practice. The Joint Carriers support the Commission strongly *encouraging* carriers to implement permissive 1+10-digit dialing since it is a consumer-friendly measure, but recommend that the Commission not require it, giving carriers the flexibility they may need.

## **II. Requiring Standardized Language for Call-Intercept Messages Is Unnecessary and Burdensome**

In its comments, the DOC recommends that the Commission adopt standardized language approved by the Executive Secretary for call-intercept messages, which must be used by all carriers unless a carrier provides the Commission with "sufficient cause" for not using Commission-approved language. Requiring the industry to use standardized language to be used for the call-intercept message (i.e., a recorded announcement) is unnecessary and burdensome, and could result in inconsistent, more complicated, or more costly implementations within a carrier's network. Some carriers may have standardization

within their own networks, lending itself to a single call-intercept message. Others, however, may have slight variations within their own networks depending on the switch type serving a particular NPA or area, and thus slight variations on the call-intercept message might be necessary. It is unclear how consumers will benefit by requiring carriers that need to or want to deviate from standardized language to go through the added step of seeking approval from the Executive Secretary.

Moreover, carriers have already implemented such intercept messages in their networks serving the 218 and 952 NPAs in Minnesota, and the lack of standardization in those two NPAs has not been a consumer concern. Mandatory 10-digit dialing (or 1+10-digit dialing) is by far the most prevalent dialing plan across the United States, implemented in 280 of the 343 NPAs (81.6%) in service across 47 states (including the District of Columbia),<sup>5</sup> and including the 218 and 952 NPAs in Minnesota. In those 280 NPAs, most if not all carriers have implemented recorded announcements that play when callers dial just seven digits. These announcements generally instruct callers to hang up and re-dial, including the area code. The language of these announcements has not been standardized, but instead has been left to the discretion of each carrier.

Requiring carriers in the 507 NPA first to agree on standardized language, and then implement that language as an exception to what they may have already implemented in other parts of their networks is burdensome and provides nominal benefit to consumers who are unlikely to be confused by a lack of standardization. As long as carriers implement some type of announcement that instructs a caller dialing just seven digits to try the call again and include the area code, the actual verbiage of that announcement should be left

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<sup>5</sup> See the NPA Dialing Plans report, available on the NANPA website at <https://www.nationalnanpa.com/enas/npaDialingPlansReport.do>.

to the discretion of each carrier. And if there are carriers operating in the 507 NPA that have not yet implemented mandatory 10-digit dialing elsewhere in their networks or such an announcement previously, then the industry's NPA Code Relief Planning and Notification Guidelines provide some suggested verbiage for such an announcement.<sup>6</sup> The carriers operating in Minnesota (and in other states) should continue to have the ability to develop and use verbiage that best serves their networks and their customers.

### **Conclusion**

An all-services overlay is the superior method of relief for the 507 NPA; it best serves the public interest because it treats all customers who have a 507 telephone number in an equitable manner, significantly minimizes inconvenience to consumers and businesses, and provides a long period of relief. For the reasons set forth above and in their previously submitted comments, the Joint Carriers urge the Commission to approve the industry's consensus recommendations for an all-services overlay for the 507 NPA and the 13-month implementation schedule no later than May 31, 2023. Further, for the reasons set forth above the Joint Carriers urge the Commission to reject recommendations from the DOC that would require carriers to implement permissive 1+10-digit dialing, and that would require carriers to agree upon and implement standardized language for call-intercept messages. Such requirements are unnecessary and could hamper the successful implementation of an all-services overlay for relief of the 507 NPA.

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<sup>6</sup> See the NPA Code Relief Planning and Notification Guidelines, Section 13.1, available for download at [https://access.atis.org/apps/group\\_public/documents.php?view=.](https://access.atis.org/apps/group_public/documents.php?view=)

Respectfully submitted,

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