

January 3, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E. Suite 350
St. Paul, MN 55101-2147

RE: **In the Matter of a Relief Plan for the Exhaust of the 507 Numbering Plan Area.**
Docket No: P999/M-22-461

Dear Mr. Seuffert:

Attached are comments of the Department of Commerce concerning a Relief Plan for the Exhaust of the 507 Numbering Plan Area.

The petition was filed on August 23, 2022 by:

Kimberly Wheeler Miller
Counsel for North American Numbering Plan Administrator
13221 Woodland Park Road, Suite 200
Herndon, VA 20171
844-445-4623
kmiller@somos.com

The Department recommends that the Commission adopt an all-services overlay for the existing area covered by the 507 area code.

Sincerely,

/s/ KYLE STRAITON
Rate Analyst

KS/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Relief Plan for the Exhaust of the 507 Numbering Plan Area

Docket No: P999/M-22-461

I. BACKGROUND

A. HISTORY

The State of Minnesota is currently served by six numbering plan areas (“NPAs” or “area codes”). In 1947, Minnesota began with just two area codes, 218 and 612. In 1954, the State added 507, in 1998, it added 651, and in 2000, it added 763 and 952.¹ Though Minnesota has previously implemented a geographic split, this area code relief method has not been implemented in the United States since 2007.² The prevailing area code relief method is now an all-services distributed overlay, which introduces an additional area code to serve the geographic area of an existing NPA.

The North American Numbering Plan Administrator (“NANPA”) is responsible for,

“the neutral administration of NANP [**North American Numbering Plan**] numbering resources, subject to directives from regulatory authorities in the countries that share the NANP. NANPA's responsibilities include assignment of NANP resources, and, in the U.S. and its territories, coordination of area code relief planning and collection of utilization and forecast data.”³

NANPA also conducts exhaust analyses of existing area codes and forecasts when each area code will run out of numbering resources. Regarding Minnesota’s area codes, NANPA estimates that the 507 area code will exhaust in the first quarter of 2025. It also estimates that the 218 area code will exhaust in the fourth quarter of 2026. Forecasts for each of Minnesota’s other four area codes predict exhaustion in 2038 or beyond.⁴ At this time, Minnesota must implement a plan to address the exhaustion of the existing 507 area code.

¹ NANPA Area Code Queries, 218, 612, 507, 651, 763, 952, [NPA Query Report \(nationalnanpa.com\)](https://www.nationalnanpa.com/reports/2022-2-NPA-Exhaust-Projections-Final.pdf)

² NANPA Petition, **Relief Plan for the Exhaust of the 507 Numbering Plan Area**, Docket P999/M-22-461

³ NANPA Website, [NANPA : North American Numbering Plan Administration - About Us \(nationalnanpa.com\)](https://www.nationalnanpa.com/reports/2022-2-NPA-Exhaust-Projections-Final.pdf)

⁴ NANPA Exhaust forecasts, October 2022 <https://www.nationalnanpa.com/reports/2022-2-NPA-Exhaust-Projections-Final.pdf>

B. CURRENT PETITION

On August 23, 2022 NANPA filed a petition on behalf of the telecommunications industry regarding the projected expiration of numbering resources in the 507 area code. The 507 service area covers the Southern 1/5 of the State and includes the cities of Rochester, Mankato, Worthington, Owatonna, Albert Lee, Marshall, and many others.⁵ The 507 area code has been in place since 1954 and current estimates project that numbering resources for it will expire in the first quarter of 2025.⁶ The Public Utilities Commission (“Commission”) must decide upon a course of action for relief with sufficient time for public comment, planning for the new area code’s implementation, and to notify and educate the public.

NANPA’s petition explained that it had,

“...convened an Industry NPA relief planning meeting via web conference on July 19, 2022. During this meeting the Industry reviewed an Initial Planning Document (IPD) which included two alternatives for relief, an all-services distributed overlay and a geographic split.”⁷

NANPA’s petition explains that the, “Industry reached consensus to recommend...the all-services distributed overlay of the 507 NPA.”⁸

C. PUBLIC COMMENT

The Commission held a meeting for public comment on December 6, 2022. Commission staff outlined the two primary solutions to address the exhaustion of the 507 area code. Commission staff opened the floor for public comment, but no comments were made. The Department observed connectivity issues with the meeting and one Commerce staff member was unable to gain access to listen to or view the meeting. As of December 27, 2022, only one public comment had been received.

II. STATEMENT OF ISSUES

The issue facing the Commission is which relief alternative is to be adopted and what direction, if any, the Commission provides the industry to implement its chosen relief alternative. If the State fails to adopt a solution, numbering resources in the existing 507 area code will exhaust, causing residents, businesses, and government offices to not be able to obtain new numbers or subscribe to new lines of service.

⁵ NANPA Area Codes Map, https://nationalnanpa.com/area_code_maps/display.html?mn

⁶ Ibid

⁷ NANPA Petition, **Relief Plan for the Exhaust of the 507 Numbering Plan Area**, Docket P999/M-22-461

⁸ Ibid

III. ANALYSIS

The two area code relief solutions outlined in NANPA's petition are an all-services overlay of the existing 507 service area, and a geographic split of the existing 507 service area.

In an all-services overlay, the newly adopted area code would serve the existing 507 service area but would require 10-digit-dialing of the entire area, whether or not a caller's area code is the same as the destination of their call. Local calls within the existing 507 area code would remain local calls, regardless of the area code of the calling and called parties. NANPA estimates that planning and implementing an all-services overlay would take 13 months. This includes a six-month network preparation period, a six-month permissive 10-digit dialing and customer education period, and a one-month gap before implementing the new area code.⁹

A geographic split would divide the existing 507 service area into two parts, one would maintain the 507 area code and the other would adopt the newly assigned area code.¹⁰ In this alternative, seven-digit dialing would be permitted within each area code, but 10-digit dialing would be required for calls between the two area codes, though what is a local call today would remain a local call.¹¹ A geographic split would require approximately half of subscribers to change their telephone numbers to the new area code. NANPA estimates that planning and implementing this plan would take 15 months. This includes a six-month network preparation period, a six-month permissive dialing and customer-education period, and a three-month recorded announcement period, followed by the activation of the new code.¹²

Both area code relief alternatives have a projected life of more than 35 years. NANPA's petition suggests that an all-services overlay is the more consumer-friendly method of relief and is supported by the industry.¹³ If the Commission chooses to adopt an all-services overlay for area code relief, the following two issues should also be addressed:

- 1) Permissive 1+10 digit dialing.** The all-services overlay solution requires 10-digit or 1+10 digit dialing for all calls involving the existing 507 service area, even when calling a destination with the same area code. Calls that are dialed without an area code will be intercepted with a message informing the caller that they must include the area code when dialing. What the Commission may wish to address is whether a 1+10 digit call within the same local calling area is to be completed at the service provider's discretion, or whether completion of the call is mandatory. If completion of these calls is at the service provider's discretion and the service

⁹ NANPA Petition, **Relief Plan for the Exhaust of the 507 Numbering Plan Area**, Docket P999/M-22-461

¹⁰ Ibid

¹¹ Ibid

¹² Ibid

¹³ Ibid

provider does not allow 1+10 digit dialing for the completion of local calls, local calls dialed with 1+10 digits will be intercepted with a message telling the caller that they must not dial 1 to place a local call. If 1+10 digit dialing is allowed, the caller will be able to make a local call by either dialing 1+10 digits, or just 10 digits. If the Commission allows 1+10 digit permissive dialing at the service provider's discretion, some local service providers may choose to complete 1+10 digit local calls, while other local service providers may route the call to an intercept message, creating a patchwork of calling requirements. Whether permissive 1+10 digit calling is required or not, callers are to be charged for a toll call only if the call destination is already considered a long-distance call and charged for a local call if the call is already considered a local call.¹⁴ Clearly, requiring permissive 1+10 digit dialing is to the benefit of customers.

- 2) **Intercept Message Standardization.** Implementing either area code relief alternative will require intercept messages for calls not routed to the called party. Examples may include customers that dial seven digits rather than 10 digits or customers that dial 1+10 digits if permissive 1+10 digit dialing is not allowed by the service provider. The Commission should consider approving standardized language for intercept messages associated with this area code relief effort. Standardized intercept messages should be used by all carriers for calls impacted by the introduction of the new area code unless such carriers provide sufficient cause for not using Commission-approved language.

IV. PUBLIC INTEREST

The Department believes that the public interest will be best-served with the introduction of a new area code through an all-services overlay. This alternative allows existing customers in the 507 service area to retain their numbers and requires less time to implement. The other proposed relief method, a geographic split, has not been used in the United States since 2007.¹⁵ Though an all-services overlay will require 10-digit dialing, 10-digit dialing is already required in some Minnesota area codes due to the implementation of the 988 Suicide and Crisis Lifeline.¹⁶ In addition, requiring 1+10 digit permissive dialing to complete local calls should be implemented unless a carrier seeks and obtains a waiver from the Commission.

V. COMMISSION OPTIONS

The Commission may choose to:

1. Approve an All-Services Overlay for the 507 service area.
 - a. Approve NANPA's suggested timeline for planning and implementation.

¹⁴ See Information Request from Commerce to NANPA

¹⁵ NANPA Petition, **Relief Plan for the Exhaust of the 507 Numbering Plan Area**, Docket P999/M-22-461

¹⁶ Ibid

- b. 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.
 - c. Adopt standardized language for call-intercept messages. The industry should submit proposed language to be approved by the Executive Secretary. All local service providers in the 507 service area should use the approved standardized intercept message language, unless alternative language is approved by the Executive Secretary.
- 2. Approve a geographic-split of the 507 service area.
 - a. Approve NANPA's suggested timeline for planning and implementation.
 - b. Determine which area will be served by the existing 507 area code and which will be served by the newly-introduced area code.
 - c. Adopt standardized language for call-intercept messages. The industry should submit proposed language to be approved by the Executive Secretary. All local service providers in the 507 service area should use the approved standardized intercept message language, unless alternative language is approved by the Executive Secretary.
- 3. Take other action on area code relief.

VI. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission adopt alternative 1.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. P999/M-22-461

Dated this 3rd day of **January 2023**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_22-461_M-22-461
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-461_M-22-461
Celia	McCabe	cmccabe@nanpa.com	NANPA/Somos, Inc.	Two Tower Center Blvd Floor 20 New Brunswick, NJ 08816	Electronic Service	No	OFF_SL_22-461_M-22-461
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-461_M-22-461
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-461_M-22-461
Kimberly D.	Wheeler	kmiller@somos.com	NANPA/Somos, Inc.	13221 Woodland Park Rd, Suite 200 Herndon, VA 20171	Electronic Service	No	OFF_SL_22-461_M-22-461