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STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of US WEST Communications,  
Inc. Plan for Relief of the 612 Numbering  
Plan Area (NPA) Code

SUMMARY OF PUBLIC  
COMMENTS

A series of public meetings was held in the 612 area code according to the following schedule:

<u>Date</u>	<u>Time</u>	<u>City</u>	<u>Public Speakers</u>
July 9, 1997	7:00 p.m.	Forest Lake	11
July 10, 1997	1:30 p.m.	Minneapolis	9
July 15, 1997	7:00 p.m.	Elk River	4
July 29, 1997	7:00 p.m.	St. Paul	2
July 30, 1997	1:30 p.m.	St. Paul	12
July 30, 1997	7:00 p.m.	Red Wing	9
July 31, 1997	7:00 p.m.	Eden Prairie	5

Members of the Commission were present at all of the sessions. At each session, Mark Fournier and Diane Wells gave an overview of the problem, some of the proposed solutions, and were available to answer questions.

At each session, Jack Ott, Numbering Plan Administrator for US WEST, appeared to offer his perspective based on his experience with the National Numbering Plan Administration. At each of the sessions US WEST was present and stated its views. The Department of Public Service was also present at most of them. Neither US WEST nor DPS are included in the number of "public speakers" above.

Set forth below are the concepts which emerged from the public meetings and the public comments.

I. **OVERLAY METHOD:**

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**Pros:**

Everyone can keep their existing telephone numbers

Will last forever -- unlimited expandability -- wouldn't have to reprogram computers, alarm systems, or reprint stationery, catalogs, etc.

"Name recognition", in sense of number recognition, is important to some businesses, and it would not be lost in the overlay method

Does not split community by geography, so no loss of community

No lost business due to failure of intercepts to forward callers to new area code

Avoids confusion arising from exchange boundaries not following political boundaries

Dialing ten digits all of the time is better for children, the blind, and others who might not know what area code they are in when they are calling

Different area codes in the same community would not be that bad -- we already have many different prefixes in the same community, and that works out okay

**Cons:**

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More confusing because geographic significance is lost -- don't know which area code to use

Not a lot of experience with it nationwide yet

New providers believe it is anti-competitive -- Texas PUC reversed itself under threat of litigation

Have to dial ten digits for all calls, not just some, but that may be coming soon anyway -- Going from seven digits to ten digits for everyone just maximizes the pain, because then everyone will have to reprint stationery, repaint trucks, redo television ads, etc.

The ideal overlay would be one whereby you would only have to dial seven digits if the number were in the same area code as the one you were dialing from, but you would have to dial ten digits if it was in the other area code.

## **II. GEOGRAPHIC SPLIT METHOD:**

### **A. Generally**

#### **Pros:**

More commonly used method of relief

Less confusing than mandatory 10 digit dialing in sense that some calls only require 7 digits

Doesn't impact competition in MN telecommunications market (as would overlay method)

Consumers like 7 digit dialing, so hold on to as long as possible (future technologies and conservation methods might possibly make future splits unnecessary)

#### **Cons:**

Length of relief provided not as long as other methods

Not a permanent solution

Marketing expense to businesses who have to change their area code

### **B. Types of Splits**

#### **1. River**

#### **Pros:**

People know where the river is, and which side communities are on

#### **Cons:**

Confusing b/c parts of Minneapolis are east of the river; other communities are also split

Future splits may not be along such a discernible boundary

Some central offices have customers on both sides of the river

## 2. North/South Line Split

### Pros:

Split down Highway 280 would prevent Minneapolis from being divided (as would be under River Split)

Split using a road so that Anoka would retain 612 so that Anoka wouldn't change area codes

## 3. Phone Book

### Pros:

Intuitive since most people know which communities are associated with the Minneapolis or St. Paul Phone Book

A feasible option according to Mr. Ott

### Cons:

Some suburbs not covered by either the Minneapolis or St. Paul directories, so a problem of which area code you assign these communities

Minneapolis phone book is larger than the St. Paul phone book, so there may be a disproportionate share of numbers in one area code if the phone book is used to determine the split

## 4. Donut

### Pros:

Relief is longer lasting

% of people having to change on the next area code implementation will be the least

Prevents marketing expense from changing area codes for businesses

Costs to government organizations and educational institutions to switch to a new area code aren't incurred

Least disruption to the least number of people

Better representation of economic activity and population centers

Protects businesses in the outer suburbs where there is growing economic activity

**Cons:**

Divides central business district from associated suburbs

Short sighted, future is 10 digit dialing

**5. Area Code Transfer:**

Transfer outer communities such as Red Wing or Cambridge to another area code, such as 507. Then reassign the vacated numbers.

**Pros:**

Most customers get to keep 612

Those being transferred to 507, for example, would not exhaust that area code for approximately 20 years

**Cons:**

Red Wing prefixes are currently in use in Mankato in the 507 area code. Therefore, an entire new number would have to be fashioned for either Mankato or those being transferred

Those communities being transferred lose a perception of association with the metro area

**III. OTHERS:**

**1. Technological Split:**

**Pros:**

Everyone keeps existing primary phone #'s (only technological gadgets get new area code)

Prevents cost of switching main business number for businesses, citizen organizations, non-profits, and government entities

Don't need to know pager, fax, and computer numbers anyway, so give them the new area code

Don't remember pager, fax, and computer numbers, so have to look up anyway

Numbers for technological gadgets don't have geographic association

Minimize disruption to individuals and businesses

Reduce mix-ups over discerning which number is a voice number and which is a data line for a business

Not anti-competitive because all competitors would be able to use both 612 for primaries and the new area code for "high-tech"

Devices causing the proliferation of numbers suffer any negative effects associated with a new area code

Keeping existing number would prevent difficulties for senior citizens who would have to change dialing habits

**Cons:**

FCC ruling in Chicago docket held this to be anti-competitive

Changing area code does matter to pager customers since many leave their pager numbers on their voice mail

**2. Business/Residence Split:**

Allow businesses to keep 612 and switch residential users to the new area code.

**Pros:**

Businesses get to keep existing numbers, so no marketing expense associated with changing materials to reflect new area code

People are used to changing residential numbers whenever they move, so are in a better position to deal with a new area code

**Cons:**

Since many people run businesses out of their homes, may be difficult to distinguish between business and residential uses

**3. Government Split:**

Assign all government entities to the new area code

**Pros:**

Customers get to keep existing number

**4. Reassign Hunting Numbers and Other Secondary Numbers to New Area Code:**

Hunting numbers, which are numbers used by businesses for rollovers, could be reassigned the new area code, leaving a business' main number in the 612 area code. This method would free up 612 numbers without any of the adverse effects of changing a "dialing" number (the main business number). It could also be used for other secondary numbers which are tied up by businesses.

**5. Quadrant Method:**

Suburbs keep 612 and divide the core into 4 area code quadrants using I-94 and I-35 as guidelines.

**6.a. Add 11th Digit to Indicate the Device Type (for pagers, cellulars, etc.)**

**Pros:**

11th digit indicating technology type would create little confusion over existing numbers

Using "#" or "\*" symbol as an additional digit would allow customers to keep existing number

**Cons:**

Would require national realignment - industry reluctant to do before absolutely necessary

**6.b. Additional Digit**

**Pros:**

Long term solution

Keep same number, just add the 1 digit

**Cons:**

Industry reluctance to adopt

## **7. Add Two Area Codes Now to Get Us through 2025 when 11th Digit will be added**

### **Pros:**

Avoid future splits

### **Cons:**

Against FCC guidelines for granting of new area codes because growth here not fast enough to meet standard

## **IV. OTHER ITEMS:**

The most common suggestion from the public hearings and public comments was for the Commission to select the method that would last the longest. Having to change numbers now would be a pain, but having to change them now and then change them again in just a few years, would be an outrage.

Having as long a "grace period" as possible could be a goal of the Commission. Six months would be a minimum, and more would be desirable.

Many people were concerned about the impact of a new area code on the cost of calling in their local calling area. While most were relieved upon being told that this proposed change would not turn a local call into a toll call, a few believed that it would inevitably lead to later imposition of tolls on what had been a toll-free call.

"Number use efficiency" refers to minimizing wasted numbers. In this vein, a number of people suggested:

- finding a way to redistribute numbers assigned to central offices but not yet used by customers, and unlikely to be used in the future
- services like DID and Centrex waste numbers -- find some way to use them
- limit the number of numbers that a household could have, such as not more than three, and force the household to choose how it was going to

allocate them. Any unwanted ones could be bartered or sold to households that needed more.

Respectfully submitted,

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ALLAN W. KLEIN  
Administrative Law Judge

Dated this 12th day of August 1997.