

STATE OF NEW HAMPSHIRE

Inter-Department Communication

NHPUC 20MAY'16PM2:48

DATE: May 20, 2016
AT (OFFICE): NHPUC

ML
FROM: Michael Ladam, Director, Regulatory Innovation and Strategy
SUBJECT: DT 12-142, Merrimack County Telephone Company and Wilton Telephone Company - Investigation into Decision of the North American Numbering Plan Administrator
TO: Commissioners
Debra Howland, Executive Director
CC: David Wiesner, Staff Attorney

Executive Summary

On May 19, 2016, Merrimack County Telephone Company and Wilton Telephone Company (collectively, TDS) petitioned the Commission to extend deadlines previously established between TDS and Commission Staff for the return of two number codes. This extension would be issued as a Secretarial Letter to TDS in which the Commission accepts the schedule that TDS proposes. The North American Numbering Plan Administrator (NANPA) is not involved in the agreement between the Commission and TDS on the timeframe for return of the codes.

Staff has reviewed both the request and the current status of number resources in the 603 area code. Staff recommends that the Commission grant the extensions.

Background and Recommendation

On July 16, 2012, the Commission directed NANPA to make two codes of 10,000 telephone numbers each available to TDS pursuant to an agreement between TDS and Commission Staff. Under this agreement TDS agreed to return both codes to NANPA by October 31, 2015, or to seek from the Commission an extension of up to three years at that time.

On May 19, 2016, TDS filed a request for extensions with the Commission. In its letter, TDS confirmed that it will be prepared to fully relinquish each code once its extension expires, and specifically that it will ensure that the codes do not become "contaminated." Staff has independently confirmed that each code is currently uncontaminated.

TDS asked to keep one block until May 31, 2017 (an extension 17 months shorter than the October 31, 2018 date anticipated in the original agreement with Staff) and the other block until May 31, 2019 (seven months longer than anticipated).

Under the three-year extension anticipated in the original agreement, our total of available codes would have remained reduced by two full codes for 36 months. In the actual request the pool would instead remain reduced by two codes for 19 months, and then remain reduced by just one code for an additional 24 months.

NANPA recently notified the Commission that the projected date for exhaustion of numbering resources in the 603 area code is now 2032. This provides substantial relief. When the 2012 agreement was negotiated, NANPA was projecting exhaustion in 2023.

In Staff's assessment, allowing TDS to continue using the codes until the extended dates proposed by the company does not raise concerns regarding exhaustion of telephone number resources in the State. Staff recommends that the extensions be approved. Staff is unlikely to recommend that any further extensions for use of these blocks be granted.

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