

# ANTI-DIGIT DIALING LEAGUE

*OPPOSING CREEPING NUMERALISM SINCE 1962*

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September 3, 2020

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission of the District of Columbia  
1325 G Street, N.W., Suite 800  
Washington, D.C. 20005

Re: *In the Matter of the Petition for Implementation of Relief for the 202 Area Code*, Formal Case No. 1165

Dear Ms. Westbrook-Sedgwick,

This comment concerns the Petition of the North American Numbering Plan Administrator (“NANPA”) on Behalf of the District of Columbia Telecommunications Industry (“Petition”) for relief for the 202 numbering plan area (“NPA” or “area code”)<sup>1</sup>. We recognize that numbering relief in the 202 NPA will most likely be necessary in the coming years; however, we object to the NANPA’s proposal of an all-services overlay for the 202 area code, which would superimpose a new area code over the same geographic area. We believe this would present an unreasonable burden on telephone subscribers and could be avoided by the use of a geographic split instead.

Transitions to 10-dialing are fraught with numerous hassles which are expensive and inconvenient, such as reprogramming safety alarms, PBXs, fax machines, speed dialers, private entry access systems, auto-dialers, and out-dialing lists on personal computers. Customers must also update stationery and checks to include 10-digit numbers, let all family, friends, and businesses know their 10-digit number, teach children to dial numbers using 10 digits, and educate elderly relatives and friends on the need to dial 10 digits<sup>2</sup>. Additionally, once the transition is complete, the permanent burden of dialing 10 digits on all local calls remains, and

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<sup>1</sup> Formal Case No. 1165, *In the Matter of the Petition for Implementation of Relief for the 202 Area Code*, Petition of the North American Numbering Plan Administrator on Behalf of the District of Columbia Telecommunications Industry, filed June 16, 2020 (“Petition”).

<sup>2</sup> Letter from Frank Simone, Vice President Federal Regulatory, AT&T to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-336 (filed July 7, 2020) (“AT&T July 7 Ex Parte”).

once a transition to 10-dialing has been made, it can never be reversed. A transition away from seven-digit dialing is a very serious and irreversible decision with significant consequences. Unsurprisingly, public sentiment is largely against 10-digit dialing, which is inconvenient and burdensome. This issue has been studied as number exhaustion in the NANPA has become more frequent in the past two decades. Historically, splits, which allowed the affected area to retain seven-digit dialing, were the chief mitigation used; in recent years, overlays have been the most popular or even the sole method of providing number relief. However, the FCC requires ten-digit dialing as a regulatory requirement per its Second Report and Order FCC 96-333, in order to mitigate any “anti-competitive” effects and to ensure dialing parity.

In Wisconsin, when the issue of whether to institute of a split or overlay in the late 1990s when under consideration, the public favored a geographic split. In fact, surveys published in a PSC order showed that **60% to 70% of residential customers prefer a split, primarily to retain seven-digit dialing**<sup>3</sup>. Furthermore, the aforementioned surveys showed that **an even higher percentage of businesses prefer a split, despite the fact that many of them would have to change area codes**.

A recent survey conducted by the Anti-Digit Dialing League assessed current public sentiment regarding dialplan changes in the United States. Responses were collected from 125 participants across 66 NPAs, of whom 110 or 88% used a landline telephone with some frequency. Of these, 65, or more than half, currently dial some or all of their local calls using only 7 digits. When asked if they would support an initiative that would require dialing 10 digits for local calls, the overwhelming majority – 85 or 68% of participants – said they would not be in favor of this change. Thus, public sentiment is still very much against ten-digit dialing, which continues to be a very real and burdensome public nuisance.

Requiring that one’s own area code be dialed on all local calls introduces tremendous disruption into one’s daily life. In November 2009, Mikhail Rabinovich, a neuroscientist at the BioCircuits Institute at the University of California, San Diego and Christian Beck, a graduate student at the Max Planck Institute for Dynamics and Self-Organization in Göttingen, Germany, presented a mathematical picture of how neurons fire when we recall a sequence of steps, such as when dialing a phone number. They concluded the existence of an upper bound for working memory which was close to “magical number seven”. Recalling seven items requires about 15 times neuron cluster suppression as that needed to recall three and recalling ten items – just three items more – requires inhibitory powers that are 50 times stronger<sup>4</sup>. Seven-digit telephone numbers, in effect, already push the biological limits of the human brain.

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<sup>3</sup> Overlay vs. Split, Neal McLain, April 1999. “Telecom Industry News” (“Overlay vs. Split”)

<sup>4</sup> Bick, C., & Rabinovich, M. I. (2009). Dynamical Origin of the Effective Storage Capacity in the Brain’s Working Memory. *Physical Review Letters*, 103(21).  
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The mental inconvenience of dialing an area code for local calls is further accompanied by the physical nuisance of dialing it. Although speed-dial and one-touch dialing partially mitigate the inconvenience of ten-digit dialing, they by no means come close to eliminating it, and standard dialing times will thus increase by 42%. This applies not only to successful call completions, but also calls to wrong numbers, calls to busy numbers, and misdials. Many individuals will be forced to waste a significant amount of time and productivity due to the burden of ten-digit dialing. This is further increased by the added dialing times imposed by pulse dial equipment or vertical service codes, which are dialed as \*XX using DTMF or 11XX from a pulse dial phone. One colleague from Oakland, CA, testifies that since NPA 341 was overlaid on NPA 510 in July 2019, many of her local calls now require dialing 14 digits (in instances where a vertical service code must be used: 11 digits per the new dialing requirements and 3 digits for the appropriate DTMF vertical service code). On a rotary phone, this would be *15 digits* for certain local calls. This is blatantly unacceptable and inexcusable.

We recognized that Chairman Willie L. Phillips is favorably predisposed to the use of an overlay. However, we strongly urge the Commission, with the utmost vehemence, to prefer a geographic split over an all-services overlay. We recommend the geographical area containing the downtown area of Washington, D.C. as well as important federal agencies retain the original 202 NPA, and outlying regions and neighborhoods be assigned the new area code. This would allow for a higher percentage of local calls to be dialed using only seven digits, as opposed to requiring ten or eleven digits for all local calls. This would present the minimal amount of disruption to the populous and would be less of an inconvenience and public nuisance than instituting an overlay.

Please feel free to contact me with any questions or concerns.

Sincerely,

/s/

N. Albert

National President, Anti-Digit Dialing League