

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA  
1325 G STREET, N.W., SUITE 800  
WASHINGTON, D.C. 20005**

**ORDER**

**September 16, 2020**

**FORMAL CASE NO. 1165, IN THE MATTER OF THE PETITION FOR  
IMPLEMENTATION OF RELIEF FOR THE 202 AREA CODE, Order No. 20627**

**I. INTRODUCTION**

1. Through this Order, the Public Service Commission of the District of Columbia (“Commission”) approves 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> The Commission also approves the 13-month implementation schedule proposed in the Petition. To assist consumers in transitioning to a new area code in the District of Columbia, the Commission establishes an Area Code Implementation Working Group (“Working Group”) to develop a consumer education program. Entities interested in participating in the Working Group shall file a request to join the Working Group within 30 days of the date of this Order and explain the reasons for their interest in joining the Working Group.

**II. BACKGROUND**

2. On June 16, 2020, NANPA filed its Petition requesting the Commission to approve its request to implement a new area code for the District of Columbia. The Commission sought comments on the Petition in a July 3, 2020 Public Notice.<sup>2</sup> No comments in response to the Public Notice were filed. The Commission received public comments from several members of the community, Evan Jensen;<sup>3</sup> Raul I. Sanchez;<sup>4</sup> Jeffrey Rueckgauer;<sup>5</sup> and Roger Attkisson.<sup>6</sup> The Anti-Digit Dialing League (“ADDL”) filed comments on September 3, 2020.<sup>7</sup>

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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> *67 D.C. Reg. 8308 (July 3, 2020).*

<sup>3</sup> *Formal Case No. 1165, Public Comments of Raul I. Sanchez, Jeffrey Rueckgauer, and Roger Attkisson, filed September 2, 2020.*

<sup>4</sup> *Formal Case No. 1165, Public Comments of Raul I. Sanchez, filed September 2, 2020.*

<sup>5</sup> *Formal Case No. 1165, Public Comments of Jeffrey Rueckgauer, filed September 2, 2020.*

<sup>6</sup> *Formal Case No. 1165, Public Comments of Roger Attkisson, filed September 2, 2020.*

<sup>7</sup> *Formal Case No. 1165, Letter to Brinda Westbrook-Sedgwick, Commission Secretary, from N. Albert, National President, Anti-Digit Dialing League (“ADDL Comments”), filed September 3, 2020.*

3. The Commission convened a community hearing on the Petition on September 1, 2020.<sup>8</sup> There were two witnesses: NANPA and Carl Mason.

### III. DISCUSSION

#### A. NANPA Petition

4. In the Petition, NANPA, on behalf of the District of Columbia telecommunications industry, requests the Commission to approve a new area code with an all-services overlay throughout the entire District of Columbia as relief for number exhaust in the 202 NPA. Absent this relief, NANPA represents that the supply of telephone numbers in the 202 area code is projected to run out during the Third Quarter of 2022. In order to ensure that the District of Columbia has enough telephone numbers for customers, NANPA requests that the Commission approve the Petition no later than the Fourth Quarter of 2020 and approve a 13-month implementation schedule for the new area code. NANPA asserts that by adhering to this schedule, the new NPA will be implemented six months prior to the exhaust of the 202 area code as required by industry guidelines.<sup>9</sup> NANPA asserts that a new area code with an all-services overlay is the only form of relief that will meet industry guidelines in the District of Columbia since the 202 NPA consists of a single rate center.<sup>10</sup>

5. NANPA explains that the proposed all-services overlay for the 202 area code would superimpose a new area code over the entire geographic area of the 202 area code. NANPA represents that all existing customers with a 202 area code would retain the 202 area code and would not have to change telephone numbers. All calls within the 202 area code and between the new area code and the 202 area code would be dialed using (ten) 10 digits.<sup>11</sup> NANPA proposes a 13-month implementation schedule for implementation of the new area code, divided into (three) 3 stages. The first stage includes six months of network preparation. The second stage is (six) 6 months of a customer education period in which customers would be permitted to use both (seven) 7-digit and (ten) 10-digit dialing within the 202 area code (“permissive dialing period”). The third stage is for one month after the end of the permissive dialing period (when (ten) 10-digit dialing becomes mandatory in the 202 area code) before numbers can be assigned in the new area code.<sup>12</sup> The Commission is requested to approve the Petition and the implementation schedule in order to facilitate the transition to having a second area code in the District of Columbia.<sup>13</sup>

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<sup>8</sup> See, 67 D.C. Reg. 9286 (July 31, 2020).

<sup>9</sup> Petition at 1.

<sup>10</sup> Petition at 2.

<sup>11</sup> Petition at 3.

<sup>12</sup> Petition at 4.

<sup>13</sup> State public service commissions have the authority to review and approve NPA relief plans. See, 47 C.F.R. § 52.19 (2020).

## B. Community Input

6. The Commission received community comments in response to the Petition. Evan Jensen supports the Petition, arguing that a new area code would benefit the District of Columbia.<sup>14</sup> The Commission received comments from three individuals on September 2, 2020: Raul I. Sanchez; Jeffrey Rueckgauer; and Roger Attkisson. These commenters supported the all-services overlay, with Mr. Rueckgauer and Mr. Attkisson suggesting certain NPAs. Mr. Rueckgauer also suggested retaining permissive dialing.<sup>15</sup> At the September 1, 2020 Community Hearing, there were two witnesses: NANPA and Carl Mason. NANPA gave a presentation on the implementation process for new area codes, indicating that the all-services overlay was the only option for the District of Columbia because the District of Columbia has only one rate center.<sup>16</sup> Mr. Mason advocated for the selection of a certain NPA.<sup>17</sup>

7. ADDL opposes the NANPA Petition's recommendation of an all-services overlay. ADDL argues that an all-services overlay is burdensome and disruptive to customers who are required to switch dialing patterns.<sup>18</sup> ADDL recommends a geographic split, with the downtown business area and federal agencies retaining the 202 area code, while other parts of the District of Columbia obtaining the new area code.<sup>19</sup>

## C. Decision

8. In the Petition, NANPA informed the Commission that the District of Columbia needs a new area code because the supply of telephone numbers is projected to run out by the third quarter of 2022. Pursuant to 47 C.F.R. § 52.19, the FCC delegated to state commissions to review and approve NPA plans for their jurisdictions.<sup>20</sup> In reviewing the Petition, the Commission notes that there is only one industry-approved method for implementing a new area code, which is an all-services overlay over the entire District of Columbia. With this overlay, existing customers will not have to change telephone numbers, while new customers will receive a telephone number with the new area code once the 202 area code is exhausted. The only substantial change is that customers dialing within the District of Columbia will be required to dial 10 digits instead of 7 digits. Under the implementation plan provided in the Petition, there is sufficient time to educate District of Columbia residents about this change. For all of these reasons, the Commission approves the Petition.<sup>21</sup>

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<sup>14</sup> Public Comments of Evan Jensen.

<sup>15</sup> Comments of Raul I. Sanchez, Jeffrey Rueckgauer, and Roger Attkisson.

<sup>16</sup> Transcript of September 1, 2020 Community Hearing ("Tr.") at 12.

<sup>17</sup> Tr. At 16.

<sup>18</sup> ADDL Comments at 1-2.

<sup>19</sup> ADDL Comments at 3.

<sup>20</sup> *See*, 47 C.F.R. § 52.19 (2020).

<sup>21</sup> Since NANPA, not the Commission, selects the new NPA, the Commission takes no position on the NPAs suggested by several commenters.

9. The Commission notes that ADDL prefers a geographic split so that 7-digit dialing can be preserved. However, NANPA indicates that a geographic split is not possible in the District of Columbia, since the District of Columbia has only one rate center, which cannot be split. Thus, the Commission rejects ADDL's recommendation.

10. The Commission also approves the implementation plan included in the Petition. This implementation plan provides the necessary time to undertake all of the activities necessary to ensure that the new area code is implemented according to industry guidelines. As noted in the implementation plan, there will be a limited permissive dialing period in which callers can use either 7-digit or 10-digit dialing, after which 10-digit dialing will become mandatory because the new area code cannot be overlaid without mandatory 10-digit dialing.

11. Because this is the first area code overlay to be implemented in the District of Columbia, the Commission believes that consumer education will be vital to the smooth implementation of the new area code. To that end, the Commission establishes an Area Code Implementation Working Group to be comprised of Commission staff, the Office of the People's Counsel for the District of Columbia, the District of Columbia Government, NANPA, and upon request, representatives of other interested telecommunications service providers, agencies, or entities. Entities interested in participating in the Area Code Implementation Working Group shall file a request to join the Working Group within 30 days of the date of this Order and explain the reasons for their interest in joining the Working Group. The Commission will determine the composition of the Working Group and establish a meeting schedule after this time.

**THEREFORE, IT IS ORDERED THAT:**

12. The Petition of the North American Numbering Plan Administrator on Behalf of the District of Columbia Telecommunications Industry is **APPROVED**;

13. The 13-month implementation plan in the Petition of the North American Numbering Plan Administrator on Behalf of the District of Columbia Telecommunications Industry is **APPROVED**;

14. The Area Code Implementation Working Group is established to educate District of Columbia consumers about the new area code; and

15. Interested entities may request to join the Area Code Implementation Working Group within 30 days of the date of this Order, explaining the reasons for their interest in joining the Area Code Implementation Working Group.

**A TRUE COPY:**

**BY DIRECTION OF THE COMMISSION:**



**CHIEF CLERK:**

**BRINDA WESTBROOK-SEDGWICK  
COMMISSION SECRETARY**