

Decision 13-12-055 December 19, 2013

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of the North American  
Numbering Plan Administrator, on behalf  
of the California Telecommunications  
Industry, for Relief of the 415 Numbering  
Plan Area.

Application 13-05-013  
(Filed May 24, 2013)

**DECISION GRANTING REQUEST FOR THE 628 AREA CODE  
OVERLAY IN THE 415 AREA CODE**

**1. Summary**

By this decision, we grant the application, filed by the North American Numbering Plan Administrator (NANPA) on behalf of the telecommunications industry (industry), requesting approval of an area code overlay (overlay) utilizing the 628 area code for the 415 numbering plan area (NPA) with a 13-month implementation schedule.<sup>1</sup> The overlay will provide additional numbering resources to meet the demand for telephone numbers. We also adopt the recommended implementation Plan and schedule included in NANPA's Application which sets a February 2014 start date for customer education and network preparation. In addition, we adopt a public education program based

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<sup>1</sup> As a neutral third-party administrator, NANPA has no independent view regarding the relief option proposed in the application made on behalf of the industry. The "industry" is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 415 area code. The 415 NPA is the geographic area served by the 415 area code. For convenience and because it is common practice, we refer to both the area code and the NPA as the "415 area code."

on NANPA's recommendation, as modified based on comments received to facilitate implementation of the overlay.

After the implementation period, the overlay area code (628) will be available for new telephone number assignments in the same geographic location as the current 415 area code. Consequently, customers must dial the three-digit area code for all calls to and from telephone numbers with the 415 and 628 area codes.<sup>2</sup> Customers may begin using this new dialing procedure six months after the start of the 13-month implementation schedule (August, 2014) and continue to do so for six months (through February, 2015), i.e., during the permissive dialing period. However, customers must use the new dialing procedure, 1+10 digit dialing as described herein, at the start of the mandatory dialing period 12 months after the start of the implementation schedule. No customers will be required to change their telephone numbers. New telephone numbers with the 628 area code will be issued to customers, as required by demand, beginning one month after the start of the mandatory dialing period.<sup>3</sup>

This proceeding is closed.

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<sup>2</sup> In its *Second Report and Order and Memorandum Opinion and Order (Second R&O)*, FCC 96-333, the Federal Communications Commission (FCC) adopted a rule for overlays that required "mandatory 10-digit dialing by all customers between and within area codes in the area covered by the new area code." (*Second R&O*, paragraph 286; see also 47 C.F.R. § 52.19(c)(3)(ii).) The California Public Utilities Commission adopted an identical requirement in D.96-12-086.

<sup>3</sup> Service Providers that have been allocated blocks of 415 NXX numbers will continue to assign 415 area code sequentially, that is, on a first-come, first-served basis, to new customers until their blocks are exhausted as required by FCC regulation.

## **2. Background**

The 415 area code was created with the implementation of area codes nationwide in 1947. It was one of the first three area codes in California and at its inception covered the entire north coastal area of the state. Since its creation it has covered a smaller and smaller area with splitting off the 707 and the 408 in 1959; the 510 area code in 1991 and the 650 area code in 1997. Currently, the 415 area code consists of 14 rate centers; three of those rate centers are in San Francisco, and the remaining eleven are in Marin County.

In Decision (D.) 99-04-025 (April 1, 1999), the California Public Utilities Commission (Commission or CPUC) approved an overlay of the 415 area code with the area code 628. On December 16, 1999, the Commission indefinitely suspended the 415/628 overlay in D.99-12-051.

With the implementation of thousand-block number pooling<sup>4</sup> and other conservation measures, the life of the 415 area code has been extended, thus delaying for many years the need for a new area code. Conservation measures implemented beginning in 1999 have now run their course, and the remaining supply of central office codes (also called prefixes) has dwindled to the point that a new area code must be opened. The North American Numbering Plan Administrator (NANPA) estimates that the 415 area code will exhaust in the

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<sup>4</sup> Thousand-block number pooling is a resource allocation system that divides a prefix or central office code (NXX code), which is a group of 10,000 telephone numbers, into ten sequential blocks or groups of 1,000 telephone numbers and allocates telephone numbers in blocks of 1,000. This system allows multiple service providers operating in the same rate area to share the ten thousand-blocks in a prefix at the thousand-block level.

third quarter of 2015.<sup>5</sup> The lengthy planning process for and implementation of a new area code, as mandated by Pub. Util. Code §§ 7931 and 7932, requires that the process be undertaken in 2014.

The application presents one solution, an all-services overlay. The NANPA presented this single approach because there is no split alternative that would comply within the numbering plan area (NPA) Relief Planning Guidelines.<sup>6</sup> In a split, one side of the split retains the existing area code, while the other side acquires the new area code. The application points out that if the Commission were to order a split alternative, the NANPA would have to refer the split to the Federal Communications Commission (FCC) for review.

Moreover, a split alternative is not possible because most of the numbers (approximately 65%) in the 415 are assigned to one rate center – San Francisco Central. This imbalance in assignments makes splitting the area code so that each side would have approximately the same number of years before needing another new area code an impossibility. The projected life of an area code splitting only San Francisco Central is 23 years and the rest of the 415 area code would not need a new area code for 67 years. The 44-year difference in the two projected lives does not comply with NPA relief planning guidelines.

The Commission's Communications Division (CD) Staff presented the alternative of splitting San Francisco Central off from the remaining 415 area code at the 415 Local Jurisdiction meeting on January 16, 2013, in San Francisco

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<sup>5</sup> An area code reaches "exhaust" when the supply of available central office codes or NXX codes (three-digit prefixes in common parlance) is depleted.

<sup>6</sup> ATIS-0300061, NPA Code Relief Planning and Notification Guidelines, Alliance for Telecommunications Industry Solutions, August 3, 2012.

and at the three public meetings held on January 16 and 17, 2013, in San Francisco and San Rafael.

### **3. Need for a New Area Code**

Pursuant to Pub. Util. Code §§ 7936 and 7943(c), before approving any new area code, the Commission must obtain utilization data from NANPA for any area code for which a change is proposed, perform a telephone utilization study and implement all reasonable telephone number conservation measures.<sup>7</sup> Where there is no reasonable alternative other than to create a new area code, the Commission must do so in a way that creates the least inconvenience for customers.<sup>8</sup>

As set out above, the Commission adopted number conservation measures that extended the life of the 415 area code. Despite these measures, NANPA now projects the 415 area code will exhaust in the third quarter of 2015. NANPA fully supported this projection by providing utilization data and performing a utilization study on the 415 area code.<sup>9</sup> The Commission's CD reviewed the utilization data and study and agrees that the 415 area code will exhaust in the third quarter of 2015. Thus, the statutory requirements of §§ 7936 and 7943(c) have been satisfied. Accordingly, there is no other reasonable alternative but to create a new area code.

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<sup>7</sup> All citations are to the Public Utilities Code, unless otherwise indicated.

<sup>8</sup> Section 7943(a).

<sup>9</sup> The utilization data and study consists of NANPA's October 2012 Number Resource and Utilization Forecast and NPA Exhaust Analysis, which form the basis for NANPA's exhaust forecast.

#### **4. Split versus Overlay**

A split allows some existing customers to retain their current area code, in addition to retaining their 7-digit line number, while others will not. Those customers whose area code changes would incur the inconvenience of having to notify family, friends and those they do business with of the change. In the case of some businesses, they will also incur costs for new business cards, stationary, signage, advertising, etc., and may lose business because existing or potential customers are not made aware of the change. All customers will have to dial 1 plus the area code and the new phone number (1+10 digit dialing) to reach customers who are on the opposite side of the geographic demarcation between the 415 area code and the new area code.

An overlay requires no customers to change area codes. However, they will have to use 1+10 digit dialing for all calls, including those dialed within the same 415 area code that currently only requires only 7-digit dialing. When an area code splits, carriers can obtain additional numbers in either the new or the old area code, as the split doubled the quantity of numbers available, but “splits” them between two area codes separated by an invisible geographic boundary. In contrast, when an area code overlay is introduced, the new area code is introduced over the same geographic area as the old area code, but the new area code contains a full complement of new prefixes and line numbers. In an overlay, carriers assign numbers in the new, overlaid, area code, but also may continue to assign to customers unassigned numbers in the old area code if available. After that point the old area code numbers are all assigned, a carrier can only obtain numbers in the new area code. An overlay requires no customers to change their numbers. Pursuant to Pub. Util. Code § 7933, creation

of a new area code does not affect what is charged for the call.<sup>10</sup> However, all customers with a 415 area code will have to use 1+10 digit dialing for all calls.<sup>11</sup>

Some commenters at the public meetings objected to an overlay on the grounds that 1+10 digit dialing was over burdensome and inconvenient.

## **5. Public Meetings and Comments**

Section 7931(e)(2) requires NANPA and Commission staff to conduct at least one meeting for representatives of local jurisdictions and three public meetings within nine months from when NANPA informs the Commission of the need for an area code change. The purpose of the meetings is to inform the local representatives and the public about the area code change options and provide a forum for them to voice their opinions concerning the proposed options.

With CD's participation, the NANPA held relief planning meetings with the industry on September 6, 2012, and on March 12, 2013.

In addition, on January 16, 2013, a meeting with representatives of local jurisdictions was held in San Francisco, California at the Commission's headquarters building located across the street from San Francisco City Hall. Public participation meetings were held in San Francisco (January 16, 2013), and San Rafael (January 17, 2013). At the meetings, attendees were given the option of indicating their preferences by commenting orally or in writing using comment forms. In addition, the Commission received input via e-mail and the

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<sup>10</sup> While § 7933 refers only to an area code "split," both the physical nature of an overlay, and the CPUC's number policies mandate no change in rate structure with introduction of a new area code.

<sup>11</sup> FCC 00-429, ¶70.

Commission's web site. Overall, the Commission received 954 statements of preferences and comments; 834 supported the overlay, 99 favored a geographic split and 21 did not indicate a preference.

On July 3, 2013, Joint Telecommunications Carriers filed a response in support of an overlay. Joint Carriers consists of twelve wireless and landline communications service providers and the California Association of Competitive Telecommunications Companies.

## **6. Discussion**

While most customers responded in favor of the overlay, some did not. The reason most commonly cited was the inconvenience of 1+10-digit dialing.<sup>12</sup> In addition, some members of the public opposed any change at all or preferred that there be a unique area code for a given geographic area. While we are sympathetic to these concerns, some level of inconvenience and change is inevitable to expand the supply of telephone numbers available in this region. Ceasing to issue new telephone numbers is not a viable option. Overall, we conclude that the overlay will cause the least inconvenience for consumers and is the option preferred by customers and the industry.

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<sup>12</sup> In ordering paragraph 5 of D.96-12-086, the Commission ordered that mandatory 1+10-digit dialing "be implemented as a condition of approving any overlay, but only in the NPA regions covered by the overlay" to alleviate any anticompetitive consequences of an area code overlay. See, also, FCC 00-429, ¶70.

## **7. Public Education Program (PEP)**

### **7.1. Background**

In D.96-12-086, in Rulemaking (R.) 95-04-043 and Investigation (I.) 95-04-044, we decided that an appropriate customer education program was necessary when instituting overlays to explain the concept of an overlay, the fact that the new dialing procedure will not affect the distinction between local and toll calls or the rates charged for the calls, and the mandatory 1+10-digit dialing procedure. We also required the industry to correct signage for dialing instructions on payphones and in directories.

In D.98-05-021, in R.95-04-043 and I.95-04-044, we:

- Required service providers to institute an instructional announcement directing callers to dial 1+10-digits indefinitely after implementing the overlay;
- Required the PEP to communicate changes associated with the overlay to children, the elderly, the disabled community, and the various ethnic groups in the region;
- Prioritized the education of those entities that will need to reprogram equipment due to the new dialing procedure, such as alarm companies;
- Required the PEP to inform customers how to dial directory assistance to locate numbers applicable to different area codes within the overlay region;
- Required the use of press releases, television and radio announcements, billing inserts and the updating of telephone directories; and
- Extended the coverage of the PEP to include not only the region in which the overlay will be implemented, which should be the first priority, but also the adjacent area codes and, to a lesser extent, the whole state.

In D.98-12-081, in R.95-04-043 and I.95-04-044, we set four major objectives for the PEP:

- Public awareness of the change in dialing patterns and area code identification resulting from implementation of the overlay;
- Public understanding of how they will be affected by the change and the rationale behind the change;
- Public assurance that the cost and quality of service will not be adversely affected; and
- Promotion of positive acceptance by customers of the change.

In D.98-12-081, we required:

- The operation of a call center for consumers to obtain information regarding the overlay;
- Targeted paid advertising in the relevant zoned editions of major newspapers as well as newspapers targeted to ethnic communities;
- Bill insert notices to the adjacent area codes;
- Limited use of billboard and radio advertising; and
- Mailing of letters, brochures, and collateral materials to local government officials in the overlay and adjacent area codes.

In D.05-08-040, in R.95-04-043 and I.95-04-044, we required:

- The activities and standards previously required for the 310 and 408 overlay PEPs to achieve at least a 70% public awareness level;
- PEP outreach efforts to specifically target key governmental agencies, community leaders, chambers of commerce, major airports, hospitals, alarm providers, pay telephone providers and the state coordinator for E-911; and

- Special outreach to senior citizens, children, the disabled, and ethnic minorities including targeted newspaper, billboard, radio, and television advertising.

In D. 08-04-059, we ordered a PEP to facilitate implementation of an overlay for the 818 area code. Specifically, we ordered the PEP to be implemented through the creation of an industry task force responsible for funding the PEP and managing the PEP fund.<sup>13</sup>

Similarly, in D.11-10-031 on October 20, 2011, we ordered a PEP consistent with D.08-04-059 and D.08-10-038 for the 408 area code overlay.

NANPA's application included a consensus statement from the industry regarding a PEP asking the Commission to refrain from ordering a PEP in favor of allowing the Industry to work as a committee to develop customer education materials and methods. In the alternative, if the Commission were to require a PEP, the Industry recommended application of "the same methodology used in the 408 NPA PEP plan, and that the funding requirement be specified in the Order."

The Joint Telecommunications Carriers submitted comments regarding the PEP on July 3, 2013, and requested that Carriers "be able to adjust the PEP to most effectively meet customer awareness objectives."

## **7.2. Discussion**

We adopt a PEP for implementation of the 415 overlay in compliance with Pub. Util. Code § 7931. Specifically, we adopt a PEP/implementation plan based on the minimum requirements authorized in previous decisions, the common industry practices included in the PEPs ultimately implemented pursuant to

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<sup>13</sup> D.08-04-079, Findings of Fact, 6 through 22 at 17-19.

those decisions, primarily the methodology used for the 408 area code implementation, as NANPA has recommended. We also considered the Carriers' comments in developing the PEP/implementation plan adopted in this decision and included as Attachment A.

Previously, we have authorized our staff to oversee the finalization and implementation of the PEP.<sup>14</sup> Accordingly, we direct the CD Director to perform this function. In doing so, the CD Director may designate CD staff to carry out these tasks.

In previous decisions, we have specified a budget for the PEP.<sup>15</sup> We see no need to specify a specific budget here, because the industry should have sufficient experience with previous PEPs to determine the specifics of the budget. We require the industry to fund the PEP as necessary to achieve at least a 70% customer awareness and understanding of the change in dialing patterns and area code identification resulting from implementation of the overlay, how they will be affected by the change and the rationale behind the change. The 70% awareness requirement shall be across all major customer groups.

In previous decisions, we have utilized an industry task force to implement the PEP and manage the PEP fund. We do so here, and require this Task Force to include Commission staff and representatives from the service providers holding numbering resources in the 415 area code as of the effective date of this decision. We require the Task Force to develop a reasonable means of delineating the division of responsibility for the PEP activities so that adequate tracking and compliance can be assured. The Task Force will be responsible for

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<sup>14</sup> D.98-12-081, Ordering Paragraph 7.

<sup>15</sup> D.98-12-081, Ordering Paragraph 1.

developing the materials and content of the PEP, maximizing the use of prior PEP efforts, and conforming to the requirements of this order.

We authorize the CD Director to require sufficient industry contributions to the PEP budget fund to achieve the 70% customer awareness requirement. The CD Director shall require the Task Force to conduct a well-balanced and statistically significant survey of customers to determine whether the 70% requirement has been met. The survey shall be designed and conducted such that the general public, as well as senior citizens, the disabled and ethnic minorities are adequately represented in the survey.<sup>16</sup> The Task Force shall submit the survey questions, process, and methodology to the CD Director for review and approval prior to implementation.

If necessary to ensure the success of the PEP, the CD Director may require the Task Force to employ outside professional assistance in PEP implementation.

PEP educational, outreach, and advertising materials shall explain the type of area code change being implemented and the new dialing procedure, identify the region covered by the overlay, and explain that the cost and quality of telephone service will not be adversely affected by the change. The materials should also address the permissive dialing period, the mandatory dialing period, the tasks consumers should do in preparation of the overlay, and the reasons for adding a new area code. The Task Force shall submit all PEP educational, outreach, and advertising materials to the CD Director for review and approval.

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<sup>16</sup> Senior citizens are defined as those 65 and older.

### **7.3. Public Notifications Requirements and Schedule**

Sections 7931(f)(2) and (g) require written notices to be included with affected customer bills outlining the transition dates, the date the new area code is effective and descriptions of the geography and prefixes to be included in the new area code. This requirement does not adequately contemplate the introduction of an overlay area code where the geography and eventually, the prefixes, of the new area code will be identical to the old area code. We conclude, therefore that notices that discuss the impacted geography as the entire area code without discussion of the prefixes, and discuss transition and final dates will be sufficient to meet these statutory requirements. The first notice, as outlined in Attachment A, Item 8, meets the requirement of being sent twelve months prior to the implementation date of the new area code as discussed in subsection (f)(2). The second notice, as outlined in Attachment A, Item 17, responds to the requirement of being sent within three months of the adopted date of the new area code as required in subsection (g).

### **7.4. Potential for Continuation of the PEP Beyond the Overlay Opening Date**

In D.99-06-087, we determined that a second-phase PEP extending beyond the opening of the overlay area code might be necessary to promote necessary public awareness regarding the overlay. Therefore, the CD Director shall monitor the effectiveness of the PEP and, if the 70% customer awareness requirement is not achieved by the end of the 13-month implementation period, shall require the task force to continue the PEP to achieve the requirement.

### **7.5. PEP Funding**

Similar to the funding mechanism established in D.08-04-059 for the 818 area code PEP, we shall require PEP funds for tasks jointly assigned to all the service providers to come from those service providers holding thousand-blocks of telephone numbers in the 415 area code as of the effective date of this decision. The amount collected from each service provider shall be in proportion to the relative percentage of thousand-blocks that it holds as of the effective date of this decision. Any additional assessments or refunds shall be made on the same basis. Individual service provider costs for service provider-specific tasks shall be the responsibility of each service provider.

The Task Force shall arrange for adequate accounting of the PEP fund to ensure it is properly managed. The budget shall not include the labor costs of each service provider's representatives on the task force. The task force shall periodically report to the CD Director concerning the details of collections and disbursements.

### **8. Comments on Proposed Decision**

The proposed decision of the Administrative Law Judge (ALJ) in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. No Comments were filed.

### **9. Categorization and Need for Hearings**

In Resolution ALJ 176-3206, dated January 10, 2008, the Commission preliminarily categorized this application as ratesetting and preliminarily determined that hearings were not necessary. No protests have been received. Given these developments, a public hearing was not necessary, and it was not necessary to disturb the preliminary determinations.

## **10. Assignment of Proceeding**

Mark J. Ferron is the assigned Commissioner and Irene K. Moosen is the assigned ALJ in this proceeding.

### **Findings of Fact**

1. In D.99-04-025, the Commission approved an overlay of the 415 area code. The 415 overlay order was suspended indefinitely in D.99-12-051 on December 16, 1999.

2. Thousand-block number pooling and other conservation measures have extended the life of the 415 area code and delayed the need for an area code change.

3. The conservation measures have run their course, and the 415 area code will exhaust in the third quarter of 2015.

4. Pursuant to §§ 7936 and 7943(c), before approving any new area code, the Commission must obtain utilization data from NANPA for any area code for which a change is proposed, perform a telephone utilization study and implement all reasonable telephone number conservation measures.

5. Pursuant to § 7943(a), where there is no reasonable alternative other than to create a new area code, the Commission must do so in a way that creates the least inconvenience for customers.

6. CD reviewed the utilization data and study provided by NANPA and agrees that the 415 area code will exhaust in the third quarter of 2015.

7. The meetings required by § 7931(e)(2) were conducted as discussed herein.

8. The Commission received 954 statements of preferences and comments of which 834 supported the overlay.

9. The overlay will cause the least inconvenience for consumers and is the option preferred by customers and the industry.

10. There is a need for a PEP to facilitate implementation of the overlay for the reasons discussed herein.

11. The application proposes to conduct a PEP, but includes no information on it.

12. The Carriers' comments received were considered in developing the PEP included herein as Attachment A.

13. In previous decisions, we have utilized an industry task force to implement the PEP and manage the PEP fund.

14. In D.99-06-087, we determined that a second-phase PEP extending beyond the opening of the overlay area code might be necessary to promote necessary public awareness regarding the overlay.

15. No protests have been received.

### **Conclusions of Law**

1. Since the statutory requirements of §§ 7936 and 7943(c) have been satisfied, there is no other reasonable alternative but to create a new area code.

2. The proposed overlay for the 415 area code should be adopted.

3. The PEP included herein as Attachment A should be adopted.

4. Items 8 and 17 of Attachment A addressing customer notices in bills meet the requirements of §§ 7931(f)(2) and (g).

5. The CD Director should be directed to oversee the finalization and implementation of the PEP.

6. The industry should be required to fund the PEP as necessary to achieve at least a 70% customer awareness and understanding of the change in dialing patterns and area code identification resulting from implementation of the overlay, how they will be affected by the change and the rationale behind the

change. The 70% awareness requirement should be across all major customer groups.

7. An industry task force should be utilized to implement the PEP and manage the PEP fund.

8. The Task Force should include Commission staff and representatives from the service providers holding numbering resources in the 415 area code as of the effective date of this decision.

9. The Task Force should develop a reasonable means of delineating the division of responsibility for the PEP activities so that adequate tracking and compliance can be assured.

10. The Task Force should be responsible for developing the materials and content of the PEP, maximizing the use of prior PEP efforts, and conforming to the requirements of this order.

11. The CD Director should be authorized to require sufficient industry contributions to the PEP budget fund to achieve the 70% customer awareness requirement.

12. The CD Director should require the Task Force to conduct a well-balanced and statistically significant survey of customers to determine whether the 70% requirement has been met.

13. The survey should be designed and conducted such that the general public, as well as senior citizens, the disabled and ethnic minorities are adequately represented in the survey.

14. The task force should be required to submit the survey questions, process, and methodology to the CD Director for review and approval prior to implementation.

15. If necessary to ensure the success of the PEP, the CD Director should be authorized to require the Task Force to employ outside professional assistance in PEP implementation.

16. PEP educational, outreach, and advertising materials should explain the type of area code change being implemented and the new dialing procedure, identify the region covered by the overlay, and explain that the cost and quality of telephone service will not be adversely affected by the change. The materials should also address the permissive dialing period, the mandatory dialing period, the tasks consumers should do in preparation of the overlay, and the reasons for adding a new area code.

17. The Task Force should be required to submit all PEP educational, outreach, and advertising materials to the CD Director for review and approval prior to their use.

18. The CD Director should monitor the effectiveness of the PEP and, if the 70% customer awareness requirement is not achieved by the end of the 13-month implementation period, should require the Task Force to continue the PEP to achieve the requirement.

19. PEP funds for tasks jointly assigned to all the service providers should come from those service providers holding thousand-blocks of telephone numbers in the 415 area code as of the effective date of this decision. The amount collected from each service provider should be in proportion to the relative percentage of thousand-blocks that it holds as of the effective date of this decision. Any additional assessments or refunds should be made on the same basis.

20. Individual service provider costs for service provider-specific tasks should be the responsibility of each service provider.

21. The Task Force should arrange for adequate accounting of the PEP fund to ensure it is properly managed. The CD Director should be authorized to review the task force accounting for PEP funds.

22. The PEP budget should not include the labor costs of each service provider's representatives on the Task Force.

23. The Task Force should periodically report to the CD Director concerning the details of collections and disbursements.

24. A public hearing is not necessary.

## **O R D E R**

### **IT IS ORDERED** that:

1. The proposed 628 area code overlay for the 415 area code is adopted.
2. The Public Education Program included herein as Attachment A is adopted.
3. The Communications Division Director shall oversee the finalization and implementation of the Public Education Program.
4. The industry shall fund the Public Education Program to achieve at least 70% customer awareness and understanding across all major customer groups of the change in dialing patterns and area code identification resulting from implementation of the overlay, how they will be affected by the change and the rationale behind the change.
5. A Task Force shall be utilized to implement the Public Education Program (PEP) and manage the PEP fund.

6. The Task Force shall include Commission staff and representatives from the service providers holding numbering resources in the 415 area code as of the effective date of this decision.

7. The Task Force shall develop a reasonable means of delineating the division of responsibility for the Public Education Program activities so that adequate tracking and compliance can be assured.

8. The Task Force shall be responsible for developing the materials and content of the Public Education Program (PEP), maximizing the use of prior PEP efforts, and conforming to the requirements of this order.

9. The Communications Division Director shall monitor sufficient industry contributions to the Public Education Program budget fund to ensure they are sufficient to achieve the 70% customer awareness requirement.

10. The Communications Division Director shall monitor the activities of the Task Force to ensure that a well-balanced and statistically significant survey of customers is conducted as a means to determine whether the 70% requirement has been met.

11. The survey shall be designed and conducted such that the general public, as well as senior citizens, the disabled and ethnic minorities are adequately represented in the survey.

12. The Task Force shall submit the survey questions, process, and methodology to the Communications Division Director for review and approval prior to implementation.

13. If necessary to ensure the success of the Public Education Program (PEP), the Communications Division Director shall require the Task Force to employ outside professional assistance in PEP implementation.

14. Public Education Program educational, outreach, and advertising materials shall explain the type of area code change being implemented and the new dialing procedure, identify the region covered by the overlay, and explain that the cost and quality of telephone service will not be adversely affected by the change. The materials shall also address the permissive dialing period, the mandatory dialing period, the tasks consumers should do in preparation of the overlay and the reasons for adding a new area code.

15. The Task Force shall submit all Public Education Program educational, outreach, and advertising materials to the Communications Division Director for review and approval prior to their use.

16. The Communications Division Director shall monitor the effectiveness of the Public Education Program (PEP) and, if the 70% customer awareness requirement is not met, shall direct the Task Force to continue the PEP to achieve the requirement.

17. Public Education Program funds for tasks jointly assigned to all the service providers shall come from those service providers holding thousand blocks of telephone numbers in the 415 area code as of the effective date of this decision. The amount collected from each service provider shall be in proportion to the relative percentage of thousand-blocks that it holds as of the effective date of this decision. Any additional assessments or refunds shall be made on the same basis.

18. Individual service provider costs for service provider specific tasks shall be the responsibility of each service provider.

19. The Task Force shall arrange for adequate accounting of the Public Education Program (PEP) fund to ensure it is properly managed. The

Communications Division Director is authorized to review the Task Force accounting of PEP fund uses.

20. The Public Education Program budget shall not include the labor costs of each service provider's representatives on the Task Force.

21. The Task Force shall periodically report to the Communications Division Director concerning the details of Public Education Program fund collections and disbursements.

22. Application 13-05-013 is closed.

This order is effective today.

Dated December 19, 2013, at San Francisco, California.

MICHAEL R. PEEVEY  
President  
MICHEL PETER FLORIO  
CATHERINE J.K. SANDOVAL  
MARK J. FERRON  
CARLA J. PETERMAN  
Commissioners

## ATTACHMENT A 415 Public Education Plan

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Completed Date
1	Effective date of decision approving 415 area code overlay	NA	NA		Decision date (DOD)
2	NANPA 415 implementation meeting	CPUC Staff and Industry	Shared		3 weeks after DOD
3	Email to industry asking for participation on task force & subcommittees	Industry	Shared		3 weeks after DOD
4	Overlay information distributed internally as job aid for customer service representatives to answer customer questions. Representatives should not need to refer questions to the CPUC.	Customer service representatives	Individual		1 month after DOD
5	415 overlay update to industry websites	All customers	Individual		4 months after DOD
6	News release describing 415 area code relief plan for distribution within the 415 area code including chambers of commerce and local governments	All customers	Shared		4 months after DOD
7	Notify California Relay Services to send messages alerting customers to 1 + 10 digit dialing requirement in 415/628 area codes	Hearing impaired customers	Shared		5 months after DOD
8	Customer Notification No. 1: Announce the new area code plan. Include information about 1 + 10-digit dialing and indicate affected areas	All customers	Individual		12 months prior to implementation date
9	Provide letters with the information in Customer Notification No. 1, as well as PEP Task Force contact information and an offer to provide industry speakers, to senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, alarm service providers and public safety organizations throughout the 415 area code.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, Burbank airport, alarm service providers and public safety organizations	Shared		5 months after DOD
10	<b>Begin Permissive Dialing</b>			8 months after DOD on Saturday	14 months after DOD
11	Published Directories: Add information on cover to alert customers in 415 area code	All customers	Individual		9 months after DOD
12	Offer industry appearances on local radio and TV talk shows	All customers	Shared	3 1/2 months after DOD	9 months after DOD

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Completed Date
13	Correct payphone signage to include updated dialing instructions	All customers	Individual		11 months after DOD
14	News releases to media serving 415 area code and adjacent area codes and statewide regarding start of mandatory dialing	Statewide	Shared		11 months after DOD
15	Disseminate information in relevant zoned editions of major newspapers, ethnic media, radio and television through paid advertising. (Note: The bulk of the information should be disseminated in the three weeks preceding the beginning of mandatory 1+10 digit dialing.)	All customers	Shared	9 months after DOD	11 months after DOD
16	Offer industry appearances on local radio or TV talk shows	All customers	Shared	9 months after DOD	11 months after DOD
17	Customer Notification #2. Announce the new area code plan. Include information about mandatory 1 + 10 digit dialing and indicate affected areas.	All customers	Individual		December 2014
18	Provide letters with the information in Customer Notification No. 2, as well as PEP Task Force contact information and an offer to provide industry speakers, to senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, alarm service providers and public safety organizations throughout the 415 area code.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, Burbank airport, alarm service providers and public safety organizations	Shared		11 months after DOD
19	Complete implementation of recorded message announcing mandatory dialing	All customers	Individual		11 months after DOD
20	Conduct a balanced and statistically significant survey of customers in 415 area code, including elderly, disabled and non-English speakers, to determine level of awareness of overlay and dialing change and submit the results to the Director of the Telecommunications Division. The proposed survey methodology shall be submitted to the Director of the Telecommunications Division for approval prior to implementation.	All customers including the elderly, disabled, non-English speakers	Shared		11 months after DOD
21	<b>Begin Mandatory Dialing</b>			<b>2/21/2015</b>	

<b>Activity</b>	<b>Description</b>	<b>Audience</b>	<b>Shared or Individual Service Provider Effort</b>	<b>Start Date</b>	<b>Completed Date</b>
22	628 numbers available for assignment and implementation completed			13 months after DOD, 1 month after mandatory dialing	

(END OF ATTACHMENT A)