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Decision 18-06-013 June 21, 2018

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 510 Numbering
Plan Area.

Application 17-05-013

**DECISION GRANTING REQUEST FOR AN ALL-SERVICE AREA CODE
OVERLAY IN THE 510 NUMBERING PLAN AREA**

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Attachment A – Public Education Plan for 510 Area Code Plan

**DECISION GRANTING REQUEST FOR AN ALL-SERVICE AREA CODE
OVERLAY IN THE 510 NUMBERING PLAN AREA**

Summary

By this decision, we adopt an all-services overlay to resolve the forecasted exhaustion of numbering resources in the 510 numbering plan area, with a 13-month implementation schedule. The overlay will provide additional numbering resources to meet the demand for telephone numbers while minimizing customer inconvenience. Implementation of the relief plan shall commence immediately. We also order a public education program to facilitate implementation of the overlay.

No existing customers will be required to change their area code or specific telephone number. After the implementation period, the new overlay area code will be available for new telephone number assignments in the same region as the 510 area code. Consequently, customers must dial the three-digit area code for all calls to and from telephone numbers with the 510 and new area codes.

Customers may start using the new dialing procedure during the permissive dialing period, beginning six months after the start of the 13-month implementation schedule. However, customers must use the new 1+10-digit dialing as described herein, during the mandatory dialing period, beginning 12 months after the start of the implementation schedule. New telephone numbers with the new area code may be issued to customers beginning one month after the start of the mandatory dialing period.

This proceeding is closed.

1. Background

On May 19, 2017, Neustar Inc., the North American Numbering Plan Administrator (NANPA),¹ on behalf of the California telecommunications industry (Industry),² filed Application (A.) 17-05-013, in which it requests relief in the 510 numbering plan area (NPA or area code).³ Industry requested a 13-month schedule to implement the relief. On June 26, 2017, the California Public Utilities Commission (Commission) granted party status to The Wireless Association, the association representing the U.S. wireless communications industry. No protests or responses were filed to the application, and this application is uncontested.

1.1. Process for Determining Recommended Relief

The Federal Communications Commission (FCC) holds full responsibility over all numbering issues but has delegated to the states area code relief responsibilities.⁴ On behalf of the State of California, the Commission is

¹ As a neutral third-party administrator, NANPA has no independent view regarding the relief option proposed by the Industry in this application.

² "Industry" is composed of current and prospective telecommunications carriers operating in, or considering operations, within the 510 area code.

³ NPA, also known as an "area code," normally represents a geographic area within a state. In the current case, the numbering plan area is 510. Throughout this decision, NPA and area code are used interchangeably.

⁴

http://transition.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/IAD/utilizationdec2000.pdf

responsible for proactively monitoring area code relief planning, and overseeing the integrity and competitive neutrality of the Industry relief planning process.⁵

NANPA's primary responsibilities are to ensure numbering resources are available to the telecommunications industry in the United States of America (United States) and Canada.⁶ NANPA assigns those resources in the form of area codes and prefixes; tracks their use to ensure effective and efficient utilization; and, on a semi-annual basis, forecasts which area codes will soon run out of prefixes.⁷ When it determines that an area code is near exhaustion, NANPA, as a neutral third party, initiates and coordinates the planning process for resolving the utilization of available prefixes, which is known as "Area Code Relief Planning" (relief planning). Such relief planning, which includes the introduction of a new area code within the existing area code in which the

⁵ Public Utilities Code Section 7936 states "The commission shall direct the North American Numbering Plan Administrator to obtain utilization data for any area code for which a relief plan is proposed, prior to adopting a plan for, or setting a date for, relief."

Public Utilities Code Section 7943 (a) "It is the intent of the Legislature that when the commission has no reasonable alternative other than to create a new area code, that the commission do so in a way that creates the least inconvenience for customers." Public Utilities Code Section 7943(c) "Before approving any new area code, the commission shall first perform a telephone utilization study and implement all reasonable telephone number conservation measures."

⁶ When projecting that an area code will run out of prefixes, NANPA looks at a number of factors, including but not limited to: (1) the history of code assignments in the area code; (2) the current growth rate within the telecommunications industry in the NPA; (3) five years of annual code growth in that area code; and (4) each telecommunications service provider's semi-annual growth forecast in the area code in question to determine future demand for new prefixes. NANPA considers all this information to forecast when an area code will run out of, or "exhaust," all available prefixes. This information is also considered in NANPA's determination of the life expectancy for the relief alternatives being considered.

⁷ A prefix, also known as a central office code (CO code) is the second set of three digits of a telephone number. Prefixes are assigned to rate centers within an area code. Each prefix consists of 10,000 line numbers.

exhaust is forecast to occur, normally begins three years prior to the forecasted exhaust.⁸

After informing the Commission of the forecasted exhaust in an area code, NANPA begins the relief planning process by calling a meeting with Industry in order to identify viable solutions to the forecasted exhaust. NANPA and Industry are required to follow regulations established by the FCC and the Commission, as well as industry guidelines.⁹ After Industry develops feasible alternatives, such as an all-services overlay (overlay) or a geographic split (split),¹⁰ Industry then strives to reach consensus on the best plan to resolve the forecasted exhaust in the area code in question.

The staff of the Commission's Communications Division (Commission staff) then schedules public meetings (public participation meetings) to inform the public and to receive public comments about the area code alternatives.¹¹

⁸ Public Utilities Code Section 7931(d).

⁹ In planning area code relief, Industry: (1) is required to follow rate center boundaries; (2) may not consider certain types of relief, such as service-specific area codes for cell phones, pagers, or other services, due to current federal regulation; and (3) may consider communities of interest, city and county boundaries, and natural dividing lines like mountains or rivers. Industry then measures these items against established Industry criteria such as minimizing customer confusion, ensuring that relief plans have adequate projected lives, and maintaining competitive neutrality among service providers. ATIS - 0300061 - NPA Code Relief Planning and Notification Guidelines at Sections 2.4, 6.1, 6.3.4, and 6.4, Alliance for Telecommunications Industry Solutions. FCC 00-104 at ¶ 3.

¹⁰ An all-services overlay is a plan in which the original and new area codes apply to the same geographic area. A geographic split divides an area code into two area codes, each assigned to a specific geographic area with one area retaining the original area code and the other area is required to change to a new area code.

¹¹ Public Utilities Code Section 7931(e)(2) states that "within nine months the coordinator and the Commission staff shall conduct at least one meeting for representatives of local jurisdictions to inform them of the proposed area code relief options, and to afford the public the opportunity to discuss the potential impact of the proposed options.

After the public participation meetings, NANPA submits its application to the Commission seeking relief for the exhausting area code recommending Industry's consensus solution. After the Commission has made its decision on a relief plan, telecommunications service providers are required to implement the relief plan within a specified period adopted in the decision.

In this application, Industry reached consensus to recommend to the Commission an all-services distributed overlay plan as its choice of relief for the 510 area code. Industry also recommends a 13-month schedule for implementing the area code overlay.

1.2. Basics of the Telephone Numbering System

In each area code in the United States, telephone numbers are made up of an area code, a three-digit prefix, and a four-digit line number (for example, 510-555-0123).¹² Specific geographic areas are assigned an area code, while each individual phone line is assigned a line number. Each area code is divided up into local serving areas called exchanges; within each exchange is a rate center. The 510 area code has 13 rate centers serving the western portion of Alameda and Contra Costa Counties.¹³

Originally, telephone numbers are assigned to service providers in 10,000 block groups. Thousand-block number pooling implemented a new resource allocation system to divide 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 allowing the allocation of telephone numbers in blocks of

¹² A line number, which is the last four digits of a customer's phone number, is the number assigned to the phone line that an individual customer uses.

¹³ Application 17-05-013 at 99.

1,000. This system allows multiple service providers operating in the same rate center to share the ten thousand blocks in a prefix at the thousand-block level.

Every prefix, which is assigned to a specific rate center, includes 10,000 line numbers. The FCC has set aside certain prefixes such as 211, 511, and 911, as abbreviated dialing patterns dedicated to special uses. Consequently, only 792 usable prefixes (NXX codes) exist in a given area code. Once these 792 available prefixes are used, a new area code is necessary. As of April 18, 2017, there were only 38 useable prefixes remaining in the 510 area code (about five percent), and NANPA projects the 510 NPA to run out of prefixes in the second quarter of 2019.¹⁴

1.3. Description of 510 Area Code

The 510 area code was introduced when it was split off of the 415 area code in September 1991. The 510 area code was split when the 925 area code was split off in 1998. The area served by the 510 area code includes the western portions of Alameda and Contra Costa Counties. The 510 area code serves the cities of Alameda, Albany, Berkeley, Emeryville, Fremont, Hayward, Newark, Oakland, Piedmont, San Leandro and Union City in Alameda County; and the cities of El Cerrito, Hercules, Pinole, Richmond, and San Pablo in Contra Costa County.

This area code has a mix of urban and suburban cities with heavy industrial areas, oil refineries, chemical plants, as well as metropolitan, commercial and residential areas with varied growth. Also included are the

¹⁴ In October 2016, NANPA published a Number Resource Utilization Forecast (NRUF) and NPA Exhaust Analysis which indicated that the 510 NPA would exhaust during the second quarter of 2018. That projected exhaust date subsequently has been revised to second quarter 2019 in its October 25, 2017 NRUF and NPA Exhaust Analysis.

former Alameda Naval Air Station development, Oakland International Airport, the Port of Oakland, several universities and colleges, hospitals, museums and three major sports teams. The 510 area code is bordered on the north by the 707 area code, directly to the west by the 415/628 area codes; to the east by the 925 area code and to the south by the 408/669 area codes.

The thousand-block number pooling and other conservation measures such as the 925 area code split in 1998 helped to extend the life of the 510 area code. These measures have run their course and the available telephone numbers within the 510 area code have reduced to the point that requires relief.

2. Current Request for a New Area Code

Under Public Utilities Code Sections 7936 and 7943(c), in order to approve a new area code, the Commission must get utilization data from NANPA for the area code for which relief is proposed, perform a telephone utilization study, and implement all reasonable telephone number conservation measures. When there is no reasonable alternative to creating a new area code, the Commission must do so in a way that is the most convenient for customers.

As indicated above, the Commission implemented telephone number conservation measures that extended the life of the 510 area code. Despite these measures, NANPA projects the 510 area code will exhaust in the second quarter of 2019. NANPA supports its projection by providing utilization data and conducting a utilization data study that supports the estimated exhaustion for the 510 area code is in the second quarter 2019. The statutory requirements of Public Utilities Code Sections 7936 and 7943(c) are met and there are no reasonable alternatives to creating a new area code to address the 510 area code exhaustion.

After informing the Commission of the forecasted exhaust of the 510 area code, NANPA convened a relief planning meeting with Industry and the Commission on June 20, 2016. Industry reached consensus at this meeting to recommend to the Commission an all-services distributed overlay as the relief for the 510 area code. Industry submitted its overlay recommendation to the Commission based upon NANPA's projections that absent relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 510 area code will exhaust during the second quarter of 2019.

Commission staff held three public participation meetings in Oakland and Berkeley on January 17, 2017, and Hayward on February 15, 2017, to inform representatives of local jurisdictions and the public about the proposed area code overlay and split alternative relief options, and receive comments from the public.¹⁵ Public comments are discussed below. At the public meetings, NANPA and Commission staff presented both overlay and split alternatives, explaining the impacts and implementation of the overlay alternative that Industry proposed to resolve the 510 area code exhaustion.¹⁶

Industry met on April 24, 2017, and May 1, 2017, to discuss the public meetings and its recommendation to implement an overlay in the 510 area code. Industry again affirmed that an overlay remains the best option for the relief of the 510 area code. Industry also collectively affirmed a 13-month implementation schedule for the area code overlay.

In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 510 area code, NANPA and Industry

¹⁵ Public Utilities Code Section 7931(e)(2).

¹⁶ Application 17-05-013 at 91 through 106.

proposed a public education program for customers in the current 510 area code and requests that the Commission approve the recommended 13-month implementation schedule and public education program outlined in its application.¹⁷

2.1. Alternative Methods of Relief – Overlay versus Split

Public Utilities Code Section 7943 (a) directs the Commission to provide area code relief using the option that is most convenient for customers. Public Utilities Code Section 7934 (b) finds that new area codes cause unnecessary hardship to people in California, as they lose their existing area codes and longtime telephone numbers. Public Utilities Code Sections 7934 (c) and (d) state that new area codes increase costs to businesses and individuals, as business cards and letterhead stationery must be replaced to show the new area codes. In addition, Public Utilities Code Section 7931 (c) directs that rate area boundaries, municipal boundaries, communities of interest, and other appropriate criteria should be considered when evaluating the boundaries of a new area code.

An all-services overlay is Industry's consensus recommendation for the 510 area code relief. An overlay would superimpose a new area code over the same geographic area covered by the existing 510 area code. All existing customers would retain the 510 area code and would not have to change their area code or telephone number. The overlay alternative requires customers to dial 1 + area code + seven-digit telephone number for all calls, including local

¹⁷ Industry requests that the Commission allow the Industry to select the specific implementation dates, once decision is issued, that do not conflict with other overlay implementations occurring across the country.

calls (calls within and between the 510 area code and the new area code).¹⁸ The all-services overlay alternative has a projected life of 49 years.¹⁹

As an alternative to the all-services overlay, Industry included a description of a split option. The split option would geographically divide the 510 area code into two area codes. In this option, a line is drawn along specific rate center boundaries and a new area code would be assigned to one side of the line and the other side would retain the existing 510 area code. Within the 510 area code, a split line would run along the southern boundary of the Oakland Main-Piedmont District Area (DA) rate center, and north of the Oakland-Alameda DA rate center and Oakland-Fruitvale DA rate center. Customers on each side of the split line would retain their current seven-digit dialing for local calls within the same area code, but would require 1 + 10-digit dialing for calls made across the split line between the 510 and new area code. In addition, customers on the side with the area code change would incur the inconvenience and expense of notifying friends and family, purchasing new stationary, business cards, signage, and advertising.

¹⁸ Federal Authority: Code of Federal Regulations – Title 47: Telecommunications: 47 C.F.R. § 5219(c)(3)(ii) “No area code overlay may be implemented unless there exists, at the time of implementation, mandatory ten-digit dialing for every telephone call within and between all area codes in the geographic area covered by the overlay area code.”

California State Authority: Decision (D.) 96-08-028, Ordering Paragraph 4 "For any NPA, relief plan either pending or yet to be proposed, parties shall not propose an overlay as a relief option until or unless mandatory 1+10-digit dialing is in place at the time the overlay is implemented" and D.96-12-086, Ordering Paragraph 4 - "Mandatory 1+10-digit dialing shall be implemented as a condition of approving any overlay, but only in the NPA regions covered by the overlay."

¹⁹ Application 17-05-013 at 6, 60, and 68.

In the split option, the projected lives of the split 510 area code and new area code would be 47 years and 51 years, a difference of four years.²⁰ The imbalance is within the ten years imbalance limit according to the NPA Code Relief Planning and Notification Guidelines (Relief Planning Guidelines).²¹ However, this alternative would split the cities of Oakland and Piedmont dividing each city into two area codes and impacting city departments and services. This is inconsistent with the recognition of established municipal boundaries as outlined in Public Utilities Code Section 7931(c) and the Relief Planning Guidelines.

2.2. Public Meetings and Comments

Public Utilities Code Section 7931(e)(2) requires that within nine months from when NANPA informs the Commission of the need for a new area code, Commission staff and NANPA conduct at least one meeting for representatives of local jurisdictions and three public participation meetings.²² The purpose of the meetings is to inform the local representatives and the public about the area code change options and alternatives, and to provide a forum for local

²⁰ Application 17-05-013 at 68.

²¹ See Section 5.0 of the Relief Planning Guidelines.

²² Public Utilities Code Section 7931(e)(2) "Within nine months the coordinator and the commission staff shall conduct at least one meeting for representatives of local jurisdictions to inform them of the proposed area code relief options, and to afford them the opportunity to discuss the potential impact of the proposed options. Following the local jurisdiction meeting, the coordinator and the commission staff shall conduct at least three public meetings in the affected geographical area. The public meetings are to inform members of the public about the proposed area code relief options, and to afford affected customers an opportunity to discuss the potential impact of the proposed area code relief options and measures that may be taken to mitigate any potential disruptions. The commission may order additional public meetings to be held at any time."

representatives and the public to voice their opinions concerning the proposed relief options.

On June 29, 2016, NANPA notified the Commission of the need for 510 area code relief.²³ With NANPA's assistance, the Commission's Communication Division staff and Public Advisor's Office held three combined local jurisdiction and public participation meetings. The public participation meetings were duly noticed and held in Oakland and Berkeley on January 17, 2017, and in Hayward on February 15, 2017.

In its public participation meeting notice, Commission staff provided information about the times, dates and locations for the meetings, and provided other information to assist the public to attend, participate and submit written comments regarding the area code relief process and options, both at the meetings and to the Commission directly. Commission staff provided information on how to submit written comments by regular or electronic mail, and to obtain additional information about the proposed 510 area code relief by calling a designated telephone number listed on the Commission's website. Commission staff presented both overlay and split options at the public participation meetings.

There were a total of 24 participants in these meetings, including local jurisdiction officials, service providers, members of the public, and a media representative. The Commission received 27 total oral and written comments at the public meetings, emails to the Public Advisor's Office, and/or calls to the Area Code Hotline. Only one comment expressly supported the split option.

²³ A.17-05-013 at 80.

2.3. Discussion

The 510 area code is projected to exhaust in the second quarter of 2019, requiring the Commission and NANPA to act before the exhaust occurs. NANPA utilized data in the number resources utilization and forecast (NRUF) report in forecasting the 510 area code exhaustion in accordance with Public Utilities Code Section 7936.²⁴ There is no indication that conservation measures will adequately address this exhaustion as outlined in Public Utilities Code Section 7943(c). In this application, NANPA provided descriptions of two relief options, concluding that the 510 area code relief option for the all-services overlay alternative is Industry's preferred option.

The Commission staff held three public meetings for the public and representatives of local jurisdictions in order to inform them of the proposed area code relief options. Both NANPA and Industry recommended an overlay alternative to resolve the forecasted exhaust of the 510 area code, and majority of the attendees at the three public meetings, including local jurisdiction officials, expressed support for the overlay.

An overlay is less confusing and less costly for existing customers because all customers retain the same area code and telephone number. An overlay would not require existing residential or business customers to incur the time and expense to inform family, friends, customers, and business associates of a new area code, or incur the cost of reprinting stationery and other materials.

²⁴ NANPA is required to collect, store, and maintain number resource utilization and forecast data. In accordance with FCC rules, assignees holding geographic and/or certain non-geographic (NPA 5XX and 900) telephone numbers must report on their holdings February 1 and August 1 of each year.

The overlay option is the least inconvenient and most equitable for customers, and has the least impact on local services, including emergency and government services. Therefore, we adopt an overlay to resolve the forecasted exhaust in the 510 area code. NANPA has requested a 13-month schedule to implement the overlay option. This implementation length is consistent with the authority granted in recent decisions, including D.16-07-014, D17-02-010, and D.17-05-019. Accordingly, we adopt the requested 13-month schedule.

3. Public Education Program

In D.96-12-086, in Rulemaking (R.) 95-04-043 and Investigation (I.) 95-04-044, the Commission 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 instructions on payphones and in directories.

In D.98-05-021, also in the R.95-04-043 and I.95-04-044 proceedings, the Commission:

- Required service providers to institute an instructional announcement directing callers to dial 1+10-digits indefinitely after implementing the overlay;
- Required the public education program 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 public education program 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 public education program 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, and also in the R.95-04-043 and I.95-04-044 proceedings, the Commission set four major objectives for the public education program:

- 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.

To achieve those goals, the Commission 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, and also in the R.95-04-043 and I.95-04-044 proceedings, the Commission required:

- The activities and standards previously required for the 310 and 408 area code overlay public education programs to achieve at least 70 percent public awareness level;
- Outreach 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.

Industry claims that the traditional public education program is inefficient, inequitable²⁵ and unnecessarily complex.²⁶ Industry notes that the Commission's customer education goals established in a previous decision, D.98-12-081, can be better achieved without the public education program funding element, and therefore, requests the Commission to modify the previously ordered public education programs as follows:

- "Eliminating the paid advertisement requirements (and thus the need to manage a complex funding mechanism);
- Taking advantage of the industry's and the Commission's own staff experience and expertise with respect to the timing of customer education material distribution; and

²⁵ The industry states, "...Service providers with the most assigned resources contribute the most dollars to the PEP fund, and they often contribute the most 'people' resources to the PEP effort...service providers with fewer assigned resources contribute fewer dollars to the PEP fund, and often are less likely to volunteer to assist with or even participate in PEP activities...When PEP task force volunteer efforts are unsuccessful in collecting PEP funding payments, they must ask Communications Division staff to intervene...resulting in additional workload for Commission staff." A.17-05-013 at 137.

²⁶ A.17-05-013 at 131.

- Adopting the industry's modified public education program []."27

Industry explains that the costs of paid advertisement arrangements, which include fees for attorney, bookkeeping, advertising and mailing services, make up the bulk (over 85 percent) of the total public education program budget.²⁸ Industry reasons that eliminating paid advertisements would eliminate the need to fund the public education program and thus also the need to manage a complex funding mechanism. Industry indicates that experience shows that paid advertisements are not necessary to ensure customers are educated, because customer notices, website postings, social media, and press releases achieve the same public awareness results. Industry further states that if the Commission believes television (TV) and radio advertisements are necessary to ensure awareness, such arrangements can be achieved through the Commission's access to free public service announcements without incurring costs.

Industry proposes other modifications, which include consolidating the special mailings to targeted key agencies, conducting special mailings via emails rather than postal mail, eliminating industry appearances on local media shows, and revising the completion dates for certain public education program activities based on industry experience from past public education programs.²⁹

Industry claims that such modifications will improve the efficiency and reduce the complexity of customer education. The industry submitted similar statements regarding customer education in other recent area code relief

²⁷ A.17-05-013 at 131-132.

²⁸ A.17-05-013 at 132.

²⁹ A.17-05-013 at 133-135.

applications³⁰. Nevertheless, in recent area code relief decisions, including D.17-05-019,³¹ the Commission required an industry-funded public education program consisting of paid media advertisements conducted by the service providers.

In A.16-11-008, NANPA's application for relief of the 805 area code, Industry similarly requested to implement customer education without an ordered and funded public education program, claiming that it has successfully done so in over 30 overlays outside of California. In D.17-05-019, the Commission found that "no record of those [customer education] activities [in other states] to allow for any sort of measurable comparison for any of the activities." On Commission oversight and funding of the public education program, the Commission noted that, although the adoption of a public education program creates a protocol not found in other states, the advantages of an authorized and funded program outweigh the disadvantages it produces.

The Commission explained that "Bookkeeping, and the establishment of a separate tax identification number and bank account are minimal costs compared to the oversight and accountability that [an authorized and funded] PEP [public education program] provides the people of California." The Commission concluded that the industry cannot meet the public awareness and acceptance goals established in D.98-12-081 without an adopted and funded public education program, and ordered the industry to implement a program consistent

³⁰ A.15-11-017 for relief of 323 area code; A.16-11-007 for relief of 916 area code; A.16-11-008 for relief of 805 area code; and A.16-12-005 for relief of 619 area code.

³¹ D.16-07-014 approving boundary elimination overlay of 213/323 area codes; D.17-02-010 approving an overlay for the 916 area code; D.17-05-019 approving an overlay for the 805 area code; and D.17-04-027 approving boundary elimination overlay of 619/858 area codes.

with the public education programs authorized in D.08-04-059 and D.08-10-038, with the modifications in D.16-07-014.³²

Industry proposes a plan for a voluntary public education program for customers in the 510 area code before implementing the 510 NPA relief authorized herein. The Commission finds that a funded public education program consistent with the public education program authorized in D.17-05-019 is required.

In D.16-07-014 and subsequent area code relief decisions, the Commission did not require the industry to conduct a public awareness survey. The Commission reasoned that as the content of the adopted program would contain the same activities used in prior public education programs that have met the 70 percent minimum customer awareness requirement established in D.05-08-040, there would be little possibility that the 70 percent threshold would not be met with the same amount of effort put forth by the industry.

However, the Commission continued to require the industry to achieve the previously established 70 percent minimum customer awareness requirement.³³ In this application, Industry requests to implement the public education program without paid advertising. A public education program that lacks paid advertisement activities is inconsistent with prior programs that have achieved the 70 percent customer awareness requirement, and with the public awareness survey eliminated, it is not possible to assess quantifiably whether a public

³² D.17-05-019 at 26-27.

³³ D.16-07-014 approving boundary elimination overlay of 213/323 area codes; D.17-02-010 approving an overlay for the 916 area code; D.17-05-019 approving an overlay for the 805 area code; and D.17-04-027 approving boundary elimination overlay of 619/858 area codes.

education program without paid advertisements can achieve a 70 percent minimum customer awareness level.

In D.98-12-081, the Commission required “Targeted paid advertising in the relevant zoned editions of major newspapers as well as newspapers targeted to ethnic communities.” In D.05-08-040, the Commission required outreach efforts to specifically target key agencies and special groups, including alarm providers, pay telephone providers, public safety responders and state E-911 coordinator, as well as conduct outreach to senior citizens, children, the disabled, and ethnic minorities including targeted newspaper, billboard, radio, and television advertising.

Industry states that paid advertisements are unnecessary, as equivalent results can be obtained through customer notices, website postings and social media. These other means of customer education target the general public, but do not provide special outreach to key organizations, minority groups and underrepresented populations, as required in D.98-12-081 and D.05-08-040. TV and radio media reaches a broader and more diverse audience, including people who are illiterate or have low literacy level. Customer notices, website postings and social media are of little to no benefit to customers who may be illiterate, have no knowledge of computers, or lack access to the internet or a computer.

Industry states that the Commission’s customer education goals can be accomplished without a funded public education program, as in over 30 overlay implementations in other states. However, there is insufficient information to establish how implementations in other jurisdictions might apply to this relief effort. What might have been sufficient in other relief efforts across the nation, including California, might not necessarily be applicable to the 510 relief, as geographic regions vary in demographic and economic characteristics. As the

Commission explained in D.17-05-019, the bureaucracy that a public education program creates is outweighed by the broader responsibility of oversight and accountability provided to the people of California.³⁴

In previous decisions, the Commission utilized an industry task force to implement the public education program and manage the program's fund. The Commission does so here, and requires this task force to consist of representatives from the service providers holding numbering resources in the 510 area code as of the effective date of this decision, and include Commission staff to oversee the implementation. The Commission requires the task force to develop a reasonable means of delineating the division of responsibility for the public education activities to ensure adequate tracking and compliance.

The task force will be responsible for developing the materials and content of the public education program, maximizing the use of prior education efforts, and conforming to the requirements of this order. As the content of the public education program will contain the same activities used in prior programs that have achieved the 70 percent customer awareness requirement, the Commission will not require a statistically significant survey of customers to determine whether the 70 percent requirement has been met.

Educational, outreach, and advertising materials should explain the type of area code change being implemented and the new dialing procedure, 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

³⁴ D.17-05-019 at 26-27. (*Also see* Section 2 c).

preparation for the overlay, and the reasons for the area code change. The task force shall submit all public education outreach materials to the Director of the Communications Division for review and approval.

Telecommunications service providers must develop a detailed public education plan that is consistent with those adopted in D.17-05-019. (*See* Attachment A to this decision.) The Communications Division Director is authorized to oversee the finalization and implementation of the public education program and authorized to take all actions necessary, including requiring sufficient Industry contributions to the program's fund, to achieve a 70 percent awareness level of the overlay in all major customer and telephone user groups. Such actions may include additional educational efforts, obtaining outside professional services, reviewing and approving all educational materials, overseeing the customer awareness assessment process, and requiring any needed additional funding from the carriers.

4. Public Education Program Funding

The public education program funding and cost allocation adopted in a similar relief for the 805 area code, D.17-05-019, is the most fair and equitable approach.³⁵ Therefore, we require the public education program funds for tasks jointly assigned to all the service providers to come from those service providers holding thousand-blocks of telephone numbers in the 510 area code as of the effective date of this decision. The amount collected from each service provider shall be proportional to the relative percentage of thousand-blocks that it holds as of the effective date of this decision.

³⁵ D.17-05-019 at 27 and Ordering Paragraph 14.

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.

We see no need to require a specific budget in this case, as Industry has sufficient experience with previous public education programs to determine the specifics of the budget. We require Industry to fund the public education program as necessary to achieve at least a 70 percent public awareness and understanding of the change in dialing patterns and area code identification resulting from implementing the overlay, how they will be affected by the change and the rationale behind the change. The 70 percent awareness requirement shall be across all major consumer and telephone user groups. We require all service providers on the task force to contribute to the implementation effort. Service providers unwilling to participate may be assigned specific tasks by the Commission.

The task force shall arrange for adequate accounting of the public education program fund to ensure proper management. The budget shall not include the labor costs of the service provider's representatives on the task force. Accounting responsibilities include developing the public education budget, determining the collection amount from each service provider, issuing invoices, collecting payments from service providers, approving vendor payments and determining any additional fund assessments and issuing any refunds. The task force shall periodically report the status of the collections and disbursements to the Communication Division Director.

Industry raises concerns when service providers fail to timely respond to the task force or submit funding payments for the public education program, creating additional workload for the Commission and task force members to

collect.³⁶ In order to address these concerns it is reasonable to require service providers holding thousand-blocks of telephone numbers in the 510 area code to promptly confirm their billing information with the task force and promptly remit full payment of their allotted share to the task force consistent with the requirements in the public education program in Attachment A.³⁷

Consistent with the public education program in Attachment A, within two weeks of the effective date of this decision, all service providers holding thousand-blocks of telephone numbers in the 510 area code as of the effective date of this decision shall provide the task force with billing information for invoicing. The task force shall then issue invoices to the service providers within 120 days from the effective date of this decision. Service providers shall remit full payment within 90 days of the invoice date. Failure to remit full payment on time may result in penalties or other enforcement actions by the Commission.

In previous decisions the Commission found a second-phase public education program extending beyond the opening of the overlay area code might be necessary to promote public awareness for the overlay.³⁸ Given the circumstances of this proceeding we continue that practice for the 510 area code overly. The Communications Division Director may monitor the effectiveness of the Public Education Program and continue the Public Education Program

³⁶ A.17-05-013 at 137.

³⁷ Public Utilities Code Section 2107 states: Any public utility that violates or fails to comply with any provision of the Constitution of this state or of this part, or that fails or neglects to comply with any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the commission, in a case in which a penalty has not otherwise been provided, is subject to a penalty of not less than five hundred dollars (\$500), nor more than fifty thousand dollars (\$50,000) for each offense.

³⁸ D.99-06-087 and D.16-07-014.

beyond the implementation period of the overlay area code in order to achieve the 70 percent public awareness requirement.

Public Utilities Code Sections 7931(f)(2) and (g) require written notices to be included with affected customer bills outlining the new area code transition date, the effective date, geographical description, and prefixes. However, this requirement does not adequately contemplate an overlay area code where the geography and prefixes for the new area code will be identical to the old area code. Therefore, notices that discuss the impacted geography, transition dates, and final dates, without discussing the prefixes, will be sufficient to meet these statutory requirements. Given projected exhaust for the 510 area code and the Public Education Program implementation adopted in this decision, we find the first written notice as outlined in Attachment A, Item 8, satisfies the requirement in subsection (f)(2). The second notice as outlined in Attachment A, Item 17, satisfies the requirement in subsection (g).

5. Categorization and Need for Hearing

In Resolution ALJ 176-3399, dated June 15, 2017, the Commission preliminarily categorized this application as ratesetting and determined that hearings were necessary. However, the Commission received no protests and this application is unopposed. Therefore, a hearing is unnecessary and we change that determination here.

6. Comments on Proposed Decision

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

7. Assignment of Proceeding

Liane M. Randolph is the assigned Commissioner and Jessica T. Hecht is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. On May 19, 2017, NANPA, on behalf of Industry submitted A.17-05-013 to the Commission requesting authority to implement the Industry's consensus solution of an overlay to relieve the 510 area code.

2. The FCC holds full responsibility over all numbering issues but has delegated area code relief responsibilities to the states. On behalf of the State of California, the Commission is responsible for proactively monitoring area code relief planning, and oversees the integrity and competitive neutrality of the Industry relief planning process.

3. NANPA's primary responsibilities are to ensure numbering resources are available to the telecommunications industry in the United States and Canada. NANPA assigns those resources in the form of area codes and prefixes; tracks their use to ensure effective and efficient utilization; and, on a semi-annual basis, forecasts the life of each area code. When an area code runs out of prefixes available for assignment, this is identified as "exhaust."

4. When NANPA determines that an area code is near exhaustion, it initiates and coordinates the relief planning process for addressing the forecasted exhaustion of available prefixes. Such relief planning, which includes the introduction of a new area code in the area code facing a forecast exhaust, typically begins three years prior to the time the forecasted exhaust is due to occur.

5. The 510 area code split off from the 415 area code in September 1991. The 510 area code split when the 925 area code was split off in 1998. The area served

by the 510 area code includes the western portions of Alameda and Contra Costa Counties.

6. The 510 area code serves the cities of Alameda, Albany, Berkeley, Emeryville, Fremont, Hayward, Newark, Oakland, Piedmont, San Leandro and Union City in Alameda County; and the cities of El Cerrito, Hercules, Pinole, Richmond, and San Pablo in Contra Costa County.

7. The 510 area code has a mix of urban and suburban cities with heavy industrial areas, oil refineries, chemical plants, as well as metropolitan, commercial and residential areas with varied growth. Also included are the former Alameda Naval Air Station development, Oakland International Airport, major Bay Area shipping ports, several universities and colleges, hospitals, museums and three major league sports teams.

8. Public Utilities Code Section 7936 requires the Commission to direct NANPA to obtain utilization data for any area code for which a change is proposed before approving any new area code.

9. Public Utilities Code Section 7943(c) requires the Commission to perform a telephone utilization study and implement all reasonable telephone number conservation measures.

10. The October 2016 NRUF report, as updated in October 2017, projects that the 510 area code will exhaust in the second quarter of 2019, requiring both the Commission and NANPA to act before exhaustion occurs. NANPA utilized data in the NRUF to forecast when the 510 area code will reach exhaustion.

11. Thousand-block number pooling and creating the 925 area code have extended the life of the 510 area code.

12. As of April 18, 2017, there were only 38 useable prefixes remaining in the 510 area code (about five percent), and the 510 area code is projected to run out of prefixes in the second quarter of 2019.

13. The 510 area code is in jeopardy of exhaustion and no conservation measures and/or member rationing will prevent exhaustion.

14. NANPA convened a relief planning meeting with Industry on June 20, 2016, in order to identify viable solutions to the forecast exhaust.

15. For the relief planning meeting, Industry followed regulations established by the FCC and the Commission, and industry guidelines.

16. The industry group reached consensus on the best plan to resolve the forecast exhaust in the 510 area code at its June 20, 2016 relief planning meeting.

17. Public Utilities Code Section 7931(e)(2) requires that within nine months from when NANPA informs the Commission of the need for an area code change, Commission staff and NANPA must conduct at least one meeting for representatives of local jurisdictions and three public participation meetings.

18. On June 29, 2016, NANPA notified the Commission of the need for 510 area code relief.

19. Commission staff and NANPA held public participation meetings within the 510 area code; in Oakland and Berkeley on January 17, 2017; and in Hayward on February 15, 2017.

20. There were a total of 24 attendees, including local jurisdiction officials, service providers, public members, and a media representative at the three public meetings.

21. Commission staff provided information to enable customers to submit comments both in person at the meetings and in writing.

22. The Commission received 27 total oral and written comments at the public meetings, emails to the Public Advisor's Office, and/or calls to the Area Code Hotline. Only one comment expressly supported the split option.

23. NANPA met on April 24, 2017 and on May 1, 2017, to discuss the public meetings and finalize Industry's consensus to recommend a 510 area code overlay.

24. An all-services overlay alternative is Industry's recommended consensus solution to address the projected exhaustion of the 510 area code.

25. Public Utilities Code Section 7943(a) requires 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.

26. The all-services overlay would superimpose a new area code over the same geographic area covered by the existing area code. Existing customers would not have to change their area code or phone number.

27. An overlay is less confusing and less costly than a split because all existing customers retain the same area code and telephone number.

28. An overlay would not require existing residential or business customers to incur the time and expense to inform family, friends, customers, and business associates of a new area code, or incur the cost of reprinting stationery and other materials.

29. The overlay option would have the least impact on customers, including emergency and government services.

30. The split alternative would be more confusing and costly with greater impact on customers, including emergency and government services as some existing customers will be assigned a new area code. Those customers with area code changes would be inconvenienced by having to notify family, friends, and

those they do business with. Some businesses would incur costs for new stationery, business cards, signage, and advertising. Businesses may lose existing or potential customers unaware on the change. The split would also split the cities of Oakland and Piedmont, dividing local government offices and phone systems into two area codes.

31. One plus 10 (1+10) digit dialing (required in California), requires a customer to dial the number one as well as all ten digits of the phone number, including the area code, prefix, and line number, when dialing to a different area code. The all-services overlay alternative requires 1+10 digit dialing for all calls within and between the 510 area code and the new area code.

32. No area code overlay may be implemented unless there exists, at the time of implementation, mandatory ten-digit dialing for every telephone call within and between all area codes in the geographic area covered by the overlay area code.

33. The all-services overlay alternative for resolving the forecasted exhaustion in the 510 area code has a projected life of 49 years.

34. A Public Education Program is needed to implement the 510 area code overlay.

35. Industry's proposal to educate customers about the overlay falls short of the minimum verifiable actions the Commission needs to implement an area code change.

36. Due to the significant changes that will occur in the consumers' dialing protocols following the implementation of the all-services overlay authorized by this decision, a public education program consistent with the programs authorized in D.17-05-019 and prior Commission decisions, including D.08-04-059 and D.08-10-038, as modified in D.16-07-014, is required.

37. In previous decisions, we have utilized an Industry task force to implement the public education program and manage the program's fund.

38. In past public education program implementations, the task force used service provider volunteers to carry out public education activities outlined in D.98-12-081 and oversee the funds.

39. A public education program is included as Attachment A. The program is based on public education programs used for previous area code overlay implementations.

40. In previous overlay implementations, many service providers did not promptly contribute to the public education program fund and remained unresponsive to payment requests creating additional and unnecessary workload for the task force and Commission staff.

41. The Commission did not receive any protests to this application.

Conclusions of Law

1. In accordance with Public Utilities Code Section 7936, NANPA and Industry considered utilization data using the October 2016 NRUF report, as updated in October 2017, in forecasting the 510 area code exhaustion, and in determining a consensus alternative to resolve the forecasted exhaust of the 510 area code.

2. In accordance with Public Utilities Code Section 7943(c), NANPA, Industry, and Commission staff considered all reasonable telephone number conservation and rationing measures in the 510 area code, and found that none will be adequate to address the projected 510 area code exhaustion in the second quarter of 2019.

3. In accordance with Public Utilities Code Section 7931(e)(2), the Commission duly noticed and held public participation meetings at various dates and times within the 510 area code.

4. The all-services overlay option will cause the least inconvenience for consumers and is the option preferred by the Industry and the majority of responding customers and local and state government in the 510 area code.

5. In accordance with Public Utilities Code Section 7943(a), the Commission should adopt the overlay option to resolve the forecasted exhaust for the 510 area code.

6. A public education program consistent with the program adopted in D.17-05-019, and prior Commission decisions D.08-04-059 and D.08-10-038, as modified in D.16-07-014, should be adopted (Attachment A to this decision).

7. The Communications Division Director should oversee the finalization and implementation of the public education program and should require all actions necessary to achieve a 70 percent awareness level of the overlay in all major customer and telephone user groups. Such actions may include additional educational efforts, obtaining outside professional services, reviewing and approving all educational materials, overseeing the customer awareness assessment process, and requiring any needed additional funding from the carriers.

8. An Industry task force should implement the public education program and manage the program's fund.

9. The task force should include Commission staff and representatives from the service providers holding numbering resources in the 510 area codes as of the effective date of this decision.

10. The task force should develop a reasonable means of delineating the division of responsibility for the public education program activities to assure adequate tracking and compliance.

11. The task force should allocate volunteers to ensure a timely schedule. All service providers on the task force should be required to contribute to the implementation effort.

12. The task force should develop the materials and content of the public education program, maximizing the use of prior program efforts, and conforming to the requirements of this order.

13. As the content of the public education program will contain the same activities used in prior programs that have achieved the 70 percent customer awareness requirement, we should not require a statistically significant survey of customers to determine whether the 70 percent requirement has been met.

14. The public education program's educational, outreach, and advertising materials should explain the type of area code change being implemented and the new dialing procedure, 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 for the overlay, and the reasons for the area code change.

15. The task force should submit all public education program educational, outreach, and advertising materials to the Communications Division Director for review and approval prior to use.

16. The Communications Division Director should monitor the effectiveness of the public education program in achieving the 70 percent public awareness

requirement and, if needed, continue the program after the implementation period.

17. Public education program funds for tasks jointly assigned to all the service providers should come from those service providers holding thousand-blocks of telephone numbers in the 510 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.

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

19. The task force should arrange for adequate accounting of the public education program fund to ensure it is properly managed. Communications Division Director should review the task force accounting for the program's funds.

20. The public education program budget should not include the labor costs of each service provider's representatives on the task force.

21. A public education fund collection mechanism should be established to prevent late payment and non-payment of public education program fund contributions.

22. The task force should periodically report to the Communications Division Director concerning the details of collections and disbursements.

23. The schedule requested by NANPA to be implemented will provide enough time for full implementation of the overlay to occur prior to the forecasted 510 area code exhaust.

24. The implementation of the all-services overlay alternative for the relief of the 510 area code should commence immediately.

25. An evidentiary hearing is not necessary.

26. This proceeding should be closed.

O R D E R

IT IS ORDERED that:

1. The proposed all-services overlay in the 510 area code is adopted.

2. A public education program included herein as Attachment A is adopted for the all-services overlay for the 510 area code.

3. The Communications Division Director is authorized to oversee the finalization and implementation of the public education program and is authorized to take all actions necessary to achieve a 70 percent awareness level of the overlay in all major customer and telephone user groups. Such actions may include additional educational efforts, obtaining outside professional services, reviewing and approving all educational materials, overseeing the customer awareness assessment process, and requiring any needed additional funding from the carriers.

4. Industry shall fund the public education program to achieve at least 70 percent customer awareness and understanding across all major customer groups of the change in dialing patterns and area code identification resulting from the overlay, how they will be affected by the change and the rationale behind the change.

5. A task force shall implement the public education program and manage the program's fund.

6. The task force shall include Commission staff and representatives from the service providers holding numbering resources in the 510 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 to assure adequate tracking and compliance.

8. The task force shall allocate volunteers accordingly to prevent delays in the schedule. All service provider representatives on the task force shall contribute to the implementation effort. Those unwilling to participate may be reported to the Commission and/or assigned specific tasks by the Commission.

9. The task force shall develop the materials and content of the public education program, maximizing the use of prior public education program efforts, and conforming to the requirements of this order.

10. The Communications Division Director is authorized to require sufficient Industry contributions to the public education program budget fund to ensure they are sufficient to achieve the 70 percent customer awareness requirement.

11. The Communications Division Director is authorized to monitor the activities of the task force to ensure that sufficient actions have occurred to achieve the 70 percent customer awareness requirement, and if the 70 percent customer awareness requirement is not met, is authorized to direct the task force to continue the public education program to achieve the requirement.

12. 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 area covered by the overlay, and explain that 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 for the overlay and the reasons for the area code change.

13. 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 use.

14. Service providers holding thousand-blocks of telephone numbers in the 510 area code as of the effective date of this decision shall provide public education program funds for tasks jointly assigned to said service providers.

15. Each service provider shall pay 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.

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

17. The task force shall arrange for adequate accounting of the public education program fund to ensure it is properly managed. The Communications Division Director is authorized to review the task force accounting of public education program funds, including the collection and disbursement of those funds.

18. The public education program budget shall not include the labor costs of each service provider's representatives on the task force.

19. Consistent with the public education program included herein as Attachment A, within two weeks of the effective date of this decision all service providers holding thousand-blocks of telephone numbers in the 510 area code as of the effective date of this decision, shall provide the task force volunteers with their billing information for invoicing purposes. The task force volunteers shall issue invoices to the service providers within 120 days from the effective date of

this decision. Service providers shall remit full payment within 90 days of the invoice date. Failure to remit full payment on time may result in penalties or other enforcement actions by the Commission.

20. The task force shall report monthly to the Communications Division Director concerning the details of public education program fund collections and disbursements.

21. The implementation of the all-services overlay alternative for the relief of the 510 area code shall commence immediately following the effective date of this decision.

22. Application 17-05-013 is closed.

This order is effective today.

Dated June 21, 2018, at San Francisco, California.

MICHAEL PICKER

President

CARLA J. PETERMAN

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

Commissioners

ATTACHMENT A

Public Education Plan for 510 Area Code Relief

Public Education Plan for 510 Area Code Relief

Activity	Description	Audience	Shared or Individual Service Provider Effort	Start Date	Completed Date
1	Effective date of decision approving 510 area code overlay	NA	NA		Date of Decision (DOD)
2	Contact Task Force Finance Subcommittee to confirm billing information	Service providers holding blocks in 510 as of DOD			2 weeks after DOD
3	NANPA 510 implementation meeting, and request for industry participation on PEP task force and subcommittees	CPUC Staff and 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	510 overlay update to industry websites	All customers	Individual		3 months after DOD
6	News release regarding the start of permissive dialing, the 510 area code relief plan, and the 510 area code geographic boundaries, for issue within the 510 area code and adjacent area codes, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	All customers	Shared		5 months after DOD
7	Task Force Finance Subcommittee issue invoices for PEP fund payments to service providers holding blocks in 510 as of DOD.	Task Force Finance Subcommittee			4 months after DOD
8	Customer Notification No. 1: Announce the new area code plan, including information about 1 + 10-digit dialing and indicate affected areas, the key dates, and how customers should prepare for the overlay.	All customers	Individual		4 months after DOD
9	Provide by email targeted letters with the information in Customer Notification No. 1, along with PEP Task Force contact information, and an offer to provide industry speakers, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm service providers, (3) public safety organizations and PSAPs, (4) coin-operated pay telephone providers, (5) telephone directory publishers, and (6) California Relay Services throughout the 510 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, airports, alarm service providers, public safety organizations and PSAPs, coin-operated pay telephone providers, telephone directory publishers, and California Relay Services	Shared		4 months after DOD
10	Begin Permissive Dialing			6 months after DOD on Saturday	

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11	Published Directories: Add information on cover to alert customers in 510 area code	All customers	Individual		6 months after DOD
12	Remit full payment for PEP fund contribution	Service providers holding blocks in 510 as of DOD			7 months after DOD
13	Correct payphone signage to include updated dialing instructions	All customers	Individual		10 months after DOD
14	News release regarding the start of 1 + 10-digit mandatory dialing, the 510 area code relief plan, and the 510 area code geographic boundaries, for issue within the 510 area code, adjacent area codes, and statewide, to media and key entities, including chambers of commerce and local governments. Post news release to CPUC website and social media platforms.	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	6 months after DOD	12 months after DOD
16	Offer industry appearances on local radio or TV talk shows	All customers	Shared	10 months after DOD	12 months after DOD
17	Customer Notification No. 2: Announce the new area code plan, including information about mandatory 1 + 10-digit dialing and indicate affected areas, the key dates, and how customers should prepare for the overlay.	All customers	Individual		10 months after DOD
18	Provide by email targeted letters with the information in Customer Notification No. 2, along with PEP Task Force contact information, and an offer to provide industry speakers, to (1) community-based organizations and key government agencies, including senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils, airports, and other key government agencies, (2) alarm service providers, (3) public safety organizations and PSAPs, (4) coin-operated pay telephone providers, (5) telephone directory publishers, and (6) California Relay Services throughout the 510 area code. Request that these organizations distribute the information to their members.	Senior, consumer and other advocacy/activist organizations, chambers of commerce, city councils and other key government agencies, airports, alarm service providers, public safety organizations and PSAPs, coin-operated pay telephone providers, telephone directory publishers, and California Relay Services	Shared		10 months after DOD
19	Complete implementation of recorded message announcing mandatory dialing	All customers	Individual		10 months after DOD
20	Begin Mandatory Dialing			1 month before 510 overlay effective date	
21	New NPA/Area Code assigned and implementation completed			13 months after DOD, 1 month after mandatory dialing	

(End of Attachment A)