


Memorandum

To: Commissioners Kroshus, Fedorchak and Christmann

From: Victor Schock Public Utility Analyst 

Date: November 12, 2020

Re: Commio, LLC, Bismarck Rate Center, Numbering Resources
Case No. PU-20-443

On July 16, 2020 the Federal Communications Commission (FCC) issued an order requiring a new 3-digit phone number (988) to be activated nationwide by July 16, 2022. The number is to be used as a suicide prevention hotline. The FCC's order requires that any area code utilizing the XXX-988 code must transition from 7 to 10-digit dialing across the entire area code. If an area code has no utilization of the 988 code and has it permanently deactivated, the area code may retain 7-digit dialing. Transition to 10-digit dialing must begin no later than April 24, 2021.

On August 24, 2020 Staff was made aware of the FCC order and began an investigation into its impact upon North Dakota and the 701 area code.

Staff investigation found that the 701-988 code is active in the Bismarck rate center. The block of 701-988-8 was assigned to Commio, LLC (Commio), with an active number count of 20. The block of 701-988-9 was assigned to Peerless Network, with an active number count of 13. Upon Staff's request, Peerless Network immediately reassigned 12 numbers and returned the block. However, one of their former customers had their number ported to Verizon Wireless. After a discussion about the options and procedures, Commio agreed to reassign their customers in the block in exchange for a new code being created of 701-299 and a block being assigned to them from the Bismarck rate center.

On November 2, 2020, Commio, LLC (Commio) submitted a request to the North American Numbering Pooling Administration System (NANPA) for additional numbering resources and a new 701-NXX code out of the Bismarck, North Dakota rate center. NANPA subsequently denied the request due to Commio not meeting the Months to Exhaust requirements.

Based on its investigation staff recommends the Commission conditionally approve Commio's request for a waiver with the following approval language: "The Commission orders that Commio, LLC's request for a waiver of the Months to Exhaust/Utilization Threshold requirement to establish a new 701-NXX code, and obtain a block of one thousand numbers from the number pool at the Bismarck, North Dakota rate center for replacing 701-988-8000 through 701-988-8999, which must be returned as a condition of the Commission's approval, is granted."