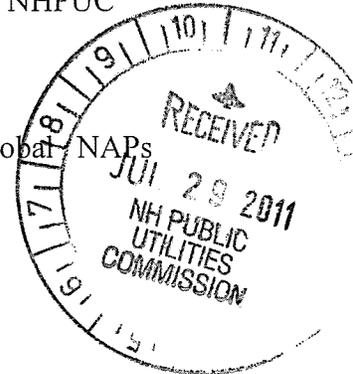


STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: July 29, 2011**AT (OFFICE):** NHPUC**FROM:** Kate Bailey, Director - Telecommunications *KMB***SUBJECT:** Recommendation on Customer Inquiry Regarding Global NAPs Telephone Number Reclamation**TO:** Debra Howland
Commission

This memo is to make you aware of a business customer with telephone number 603 584-1979, originally assigned by Global NAPs, which is subject to reclamation on November 4, 2011, pursuant to Order No. 25,210 in Docket No. DT 10-211 (Order). The customer, Paul Hartnett, owns a limousine service covering the Manchester, NH and Boston, MA area. The business is located in Derry, NH. Mr. Hartnett has glossy printed business cards, brochures and a tenant sign with the phone number printed on each.

Mr. Hartnett received notice from Vonage on Monday, July 11, 2011, that he would be required to change his telephone number pursuant to the Commission's Order. On Tuesday, July 12, Mr. Hartnett called the Consumer Affairs Division and spoke to Kathy Akerman, who explained the necessity for the change and answered questions about the Commission's order, with which Mr. Hartnett was familiar, as Vonage had mailed a copy of the Order with its notice.

Mr. Hartnett does not want to change his telephone number. After speaking with Kathy, he asked to speak to someone else. Kathy asked that I give him a call. I first spoke with him later that afternoon. He considers the Commission's Order unfair and unjust and is extremely upset that he will be required to change the main number in New Hampshire for his business. He reported that he recently purchased a sign with the number on it, that the number is published on a website and that it would cost him thousands of dollars to change the number. He asked if he could buy the number, get it from another carrier or even use it from a different rate center as the number was primarily used for inbound calls and didn't need to be assigned to Manchester. I told him that it was extremely unlikely that there would be a solution which would not require a number change but that I would explore whether there were any viable options.

Initially I contacted Vonage to determine whether it would be possible to put an extended intercept message on the number so that customers who called the number would get a message saying the number you have called has been changed to...I asked Vonage whether they could provide an intercept message and whether they knew if it were technically possible to continue to route traffic to this number after the numbers were reclaimed. Vonage does not offer an intercept service and does not have the capability to provision it. As you know, Vonage is not regulated and the Commission cannot require Vonage to provide intercept service. I asked the Vonage representative

if the customer should consider porting the number to a carrier who could provide intercept service and Vonage agreed that would be one possible option.

On Friday, July 15, 2011, I spoke with Beth Sprague, a regional director for the North American Numbering Plan Administrator. I explored options with her and verified that once carriers take translations out of the Local Exchange Routing Guide, (i.e. on or about November 4) switches no longer route these numbers, so calls to this number would no longer reach an intercept message. She confirmed that customers are often required to change telephone numbers to improve the efficiency of number use and that the Industry Guidelines for Telephone Number Administration are clear that telephone numbers are public resources and are not owned by the assignees. Consequently, the resources cannot be sold, brokered, bartered, or leased for a fee or other consideration. She gave me a contact at the FCC.

I made several calls to the FCC and received a return call from Marilyn Jones on July 21. I explained the situation and she advised me that the Commission should follow the requirements of New Hampshire law. New Hampshire law requires the commission to “promote and adopt telephone number conservation measures to the maximum extent allowed by federal law for area code 603...” RSA 374:59 II

The 584 NXX code is assigned to the Manchester, NH rate center. There are 70 blocks, or 70,000 telephone numbers, available for use in Manchester. The NXX codes associated with these blocks have been opened legitimately and cannot be reclaimed. Keeping the abandoned 584 code permanently assigned to Manchester for use of one telephone number would not be efficient as it would likely strand the remaining 9,999 telephone numbers. In order to be consistent with RSA 374:59, it must ultimately be reclaimed.

Because Mr. Hartnett is a business customer physically located in New Hampshire with printed material advertising the number which must be changed, Staff recommends extending the reclamation of the 584 code for an additional 12 months. This will allow Mr. Hartnett additional time to use the existing printed material, begin advertising his new number and either find a provider who offers intercept service to announce the number has been changed or put a voice message on the line informing his customers of the new number while answering calls on a line associated with the new number. I contacted NH Signs in Londonderry, NH, and they estimated the tenant sign could be modified with a new phone number for \$100-\$150. Given an additional 12 months, it does not appear that Mr. Hartnett’s expenses associated with a change in telephone number will be significantly different than the expense to other New Hampshire businesses which have already begun the process of transitioning to a new telephone number.

As articulated in the Commission’s Order, the reclamation of these abandoned NXX codes is consistent with federal law. Due to the number of NXX codes being reclaimed, a 12 month delay in the reclamation of the 584 NXX code will not interfere with the statutory mandate to conserve numbering resources to the maximum extent possible, but its ultimate reclamation remains necessary for efficient use of numbering resources. Accordingly, Staff recommends the Commission delay reclamation of the 584 NXX code until November 4, 2012.