

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of an Investigatory Docket Mandating)
Ten-Digit Local Dialing in Certain Area Codes)

File No. TO-2021-0XXX

MOTION TO OPEN AN INVESTIGATORY DOCKET

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its *Motion to Open an Investigatory Docket* in this matter states as follows:

1. On July 16, 2020, the Federal Communications Commission (FCC) adopted an Order approving the designation of “988” as a three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline.¹ The “988” three-digit abbreviated dialing code is scheduled to go into effect July 16, 2022.² In order for the “988” three-digit code to work, seven-digit local dialing cannot be maintained in any area code with telephone numbers containing a “988” number plan area (NPA) prefix.³ Consequently the FCC has directed ten-digit local dialing throughout any area code with a “988” NPA prefix. Nationwide there are approximately 83 area codes that will need to transition to ten-digit local dialing, which includes four area codes within Missouri.⁴

2. The North American Numbering Plan Administrator (NANPA) has established a plan to transition the 83 area codes to ten-digit local dialing.⁵ Relevant dates established by NANPA are:

¹ See Designating 988 For the National Suicide Prevention Hotline, FCC Order FCC-20-100, July 17, 2020, [Suicide Prevention Hotline | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/document/suicide-prevention-hotline-federal-communications-commission).

² Dialing “988” will route a call to the suicide prevention hotline similar to how other three-digit dialing codes route calls to certain services such as “911” (emergency services), “711” (relay services) or “211” (referral services).

³ An NPA prefix is the first three digits of a seven-digit telephone number.

⁴ The four Missouri area codes that will need to transition to ten digit local dialing are: 314, 417, 660, and 816. (Missouri’s other two area codes (573 and 636) do not have a 988 NPA in use and therefore can retain seven-digit local dialing.)

⁵ NANPA : Transition to 10-digit dialing for 988, [Copyright 2020, Somos, Inc., \(nationalnanpa.com\)](https://www.nanpa.com/).

- April 24, 2021: The deadline to implement a permissive ten-digit dialing period whereby customers in the targeted area codes can dial local calls either on a seven or ten-digit basis.⁶
- October 24, 2021: This date reflects the earliest date any company can remove seven-digit local dialing altogether from these targeted area codes.⁷
- July 15, 2022: The deadline by which companies must remove seven-digit local dialing in the targeted area codes.

3. Staff would like the Commission to open this investigatory docket to permit it to communicate with Missouri's telecommunications providers regarding their plans for implementing ten-digit local dialing. Specifically this docket intends to gather company-specific information about the timing of implementing ten-digit local dialing as well as general plans for notifying customers and certain entities.⁸ If opened, Staff expects to periodically report on its findings to the Commission.

WHEREFORE, Staff prays that the Commission will issue an order that opens an investigatory docket into this matter; and grant such other and further relief as is just in the circumstances.

⁶ Companies have the flexibility to begin the permissive dialing period earlier than April 24, 2021.

⁷ Removing seven-digit local dialing will mean if a caller attempts to dial a local call on a seven-digit basis then the call will be directed to a recorded message that the call cannot be completed as dialed. The caller will then need to hang up and dial the call on a ten-digit basis in order to complete the call.

⁸ NANPA's plan includes milestones for attempting to educate consumers. NANPA anticipates special notice will need to be given to certain entities such as 911 coordinators, alarm companies, and other entities using speed dialing and call forwarding services.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Senior Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

whitney.payne@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 3rd day of December, 2020, to all counsel of record.

/s/Whitney Payne