

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

In the Matter of an Investigatory)
Docket Mandating Ten-Digit Local) **Case No. TO-2021-0155**
Dialing in Certain Area Codes)

STAFF’S STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Status Report* in this matter hereby states:

Staff asked the Commission to open this docket on December 3, 2020, to investigate the transition to ten-digit dialing in Missouri related to the order of the Federal Communications Commission (FCC) to make the “988” three-digit abbreviated dialing code the designated code for the national suicide prevention and mental health crisis hotline. The designation necessitated a shift to ten-digit dialing for any area code containing a “988” number plan area prefix. Staff now files a *Status Report* memorandum in this docket, attached here as Attachment A, to provide the Commission with updated information on the transition. Staff will continue to file updates in this docket as the transition continues.

WHEREFORE, Staff prays that the Commission will accept its *Status Report* and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne
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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 May 2021, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Case File
Case No. TO-2021-0155

From: John Van Eschen, Utility Regulatory Manager
Kari Salsman, Research/Data Analyst
Telecommunications Department

Date: May 3, 2021

Subject: Status Report

The Commission opened this case to investigate a FCC directive to require ten-digit local dialing in any area code that has issued telephone numbers with a “988” prefix in a seven digit telephone number. This national directive will enable the three-digit code “988” to be an abbreviated dialing code to access the national suicide prevention and mental health crisis hotline effective July 16, 2022. Four of Missouri’s six area codes are affected and will be transitioned to ten-digit local dialing. This report is intended to provide an update on the status of this transition.

The North American Numbering Plan Administrator (NANPA) is leading the effort to transition 82 area codes in the United States to ten-digit local dialing.¹ Staff has been in contact with NANPA officials and Staff also participates in monthly meetings arranged by NANPA with the telecommunications industry. NANPA has established a link on its website to organize information about this transition.² This information contains a variety of information about the transition including links to relevant FCC orders, FCC fact sheets, sample customer education letters, draft press releases, and other relevant materials such as the transition plan and a mechanism for tracking progress.

The transition plan identifies 33 milestones or actions needed to address a variety of technical and customer education issues for moving the 82 area codes to a ten digit dialing arrangement. These milestones have completion deadlines and apply to NANPA, the industry and 911 providers. This plan is attached as Appendix A. Milestones No. 15, 28 and 33 are noteworthy on the basis April 24, 2021 is the deadline for introducing permissive ten-digit local dialing where calls can be completed using either seven-digits or ten-digits. Carriers can then begin to eliminate permissive dialing and require ten-digit local dialing anytime between October 24, 2021 and July 15, 2022.

¹ Staff’s Motion to Open an Investigatory Docket cited 83 area codes will be affected; however, North Dakota’s 701 area code has subsequently returned a block of ten thousand telephone numbers with a “988” prefix therefore reducing this nationwide total to 82 area codes.

² NANPA’s website is www.nationalnanpa.com. The portion of its website devoted to containing information about the ten-digit dialing transition is https://nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html

NANPA is tracking the industry's progress in meeting five key milestones.³ Carriers are required to report to NANPA after a carrier completes one of these five milestones. NANPA is organizing this information and posting aggregated results by area code.⁴ NANPA officials are aware the Commission established this docket to investigate the transition of four Missouri area codes to ten-digit local dialing. NANPA and the industry have asked Commission Staff to allow NANPA's tracking mechanism to solely provide the basis for Staff's investigation.

NANPA's tracking system has only recently started and Staff is monitoring the situation. The first tracked milestone required companies to send the first customer notice by March 25, 2021.⁵ Approximately three weeks after this deadline NANPA's tracking system reflects only 60% response rate for Missouri's four area codes. At this time it remains unclear whether this rate represents a problem with companies complying with this milestone. Subsequent discussions with NANPA officials reveal NANPA has no plans to contact non-responding companies. Consequently Staff has asked for the list of Missouri companies failing to respond to this initial milestone so Staff can follow up.

Other issues may also require Staff follow up or investigation. One potential issue is facility based carriers solely report to NANPA after completing a tracked milestone. Resellers do not report even though some customer education milestones apply to resellers. Consequently it is unclear how well resellers will comply with the customer education efforts in keeping their customers informed of the transition to ten-digit dialing. Another potential issue is the extent customer education materials will be available on company websites. Presumably companies with a website will post information about transitioning to ten-digit dialing but the applicable transition plan milestone classifies this action as voluntary rather than mandatory.⁶

Staff intends to keep the Commission apprised of any problems or issues should they develop.

³ Five milestones are being tracked: Milestone 8 (Deadline for First Customer Notice), Milestone 15 (Deadline for Implementing Permissive Dialing), Milestone 23 (Deadline for Second Customer Notice), Milestone 24 (Deadline for 10-digit Signaling Transition) and Milestone 33 (Deadline to Implement Ten-Digit Dialing).

⁴ This information is posted on previously identified NANPA's website for the ten-digit 988 transition under "Tracking of Progress" specifically the link entitled "Progress By State/Area Code".

⁵ Milestone No. 8.

⁶ Milestone No. 22. According to NANPA officials this milestone is classified as voluntary because not all companies maintain a website.

#	Milestone Type	Milestone	Milestone Narrative	Responsibility	Due Date	Date Calculation	Status	Comments as of 3/11/21
1	Both	Industry Meeting	NANPA hosts meeting with all carriers operating in the 82 NPAs to reach consensus on a single set of implementation dates for 10-digit dialing (10DD) and appropriate milestone dates. NANPA to have a proposal prepared to share with the industry at this meeting.	NANPA and affected carriers	8/14/2020	No later than 8/16/2020	COMPLETE	Notice of meeting record sent. NANPA sent notice of posting Planning Letter to https://nationalnanpa.com/pdf/PL_544.pdf on 08/18/20, Notice of meeting record sent 08/25/20. Planning Letter 556 supersedes PL-544 and posted to NANPA website on January 8, 2021. https://nationalnanpa.com/planning_letters/planning_letters_2021.html
2	Customer Education	Deadline to develop verbiage for first customer notice	Develop and supply template for first customer notification, a simple message about the permissive dialing "effective date" so customers can start practicing dialing 10 digits and reprogramming CPE. Message must outline what customers need to do to prep for mandatory 10DD. Carriers can then tweak as needed depending on whether they want to send the same message to all customers, tweak for business customers, tweak for customers in particular NPAs, etc.	NANPA	11/25/2020	5 months (150 days) prior to permissive effective date	COMPLETE	Addressed potential customer letters for permissive and mandatory dialing during 10/1/20 meeting. Notice of meeting record sent 10/20/20.
3	Customer Education	Deadline to develop and send first round of special letters	Develop and send first round of "special letters" to Directory Publishers, Coin Operated Payphone Providers, Alarm Associations, Highway Call Box Operators , and 911 State/County Coordinators & PSAPs advising of the permissive dialing effective date and the mandatory dialing effective date, and what each of these types of groups need to do to prep for mandatory 10DD. Supply these templates to industry as well in case carriers want to use them to supplement their own customer notifications.	NANPA	12/25/2020	4 months (120 days) prior to permissive effective date	COMPLETE	1. Sample templates of "Special Letters" discussed during 11/20/20 call. Letters posted to https://nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html on 11/30/20. 2. All first round "special letters" were sent to State Regulators, Directory Publishers, Coin Operated Payphone Providers, Alarm Associations, Highway Call Box Operators, Telecom Associations, Elevator Associations and Regulatory Agencies, Tribal Agency Offices, TTY Providers and 911 State/County Coordinators & PSAPs by 12/25/20.
4	Customer Education	Deadline to send first notice to PSAPs, PSALI and County Coordinators	Develop and send first notice to PSAPs, PSALI and County Coordinators of upcoming permissive and mandatory 10-digit dialing effective dates and advise that they need to update any speed calling or call forwarding numbers to 10 digits after the permissive 10-digit dialing effective date	911 Providers	12/25/2020	4 months (120 days) prior to permissive effective date	COMPLETE	This milestone is considered completed.
5	Customer Education	Deadline to develop verbiage for first press release	Develop and supply verbiage for a press release to announce the permissive and mandatory 10-digit dialing effective dates. Provide verbiage to industry, FCC so they can issue press releases as well, as needed.	NANPA	2/23/2021	2 months (60 days) prior to permissive effective date	COMPLETE	Press release agreed upon at the industry meeting on February 11, 2021. The press release has been posted to the NANPA website at https://nationalnanpa.com/transition_to_10_digit_dialing_for_988/index.html
6	Customer Education	Deadline for carriers to educate employees internally	Carriers to distribute information and update internal websites about the 82 NPAs to transition to 10-digit dialing internally as job aid for customer-facing employees to answer customer questions. There should not be a need for customer-facing employees to refer customer questions to the NANPA, the FCC or the state commissions.	Carriers	2/23/2021	2 months (60 days) prior to permissive effective date	COMPLETE	
7	Customer Education	Deadline to re-send first round of special letters as a reminder	Send second round of "special letters" again to Directory Publishers, Coin Operated Payphone Providers, Alarm Associations, Highway Call Box Operators , and 911 State/County Coordinators & PSAPs, reminding them of the permissive dialing effective date and the mandatory dialing effective date, and what each of these types of groups need to do to prep for mandatory 10DD. Supply these templates to industry as well in case carriers want to use them to supplement their own customer notifications.	NANPA	3/10/2021	45 days prior to permissive effective date	COMPLETE	All second round "special letters" were sent to 911 State/County Coordinators & PSAPs, Directory Publishers, Coin Operated Pay Telephone Providers, Alarm Associations, Highway Call Box Operators, Telecom Associations, Elevator Regulatory Agencies, Tribal Agency Offices, Seniors and TTY Providers by 3/10/2021.
8	Customer Education	Deadline to send first customer notice	Issue first customer notification. Carriers using bill messages may want to have these run multiple months rather than just one month to help ensure customers are aware of the upcoming dialing changes.	Carriers	3/25/2021	30 days prior to permissive effective date	COMPLETE	Carriers must notify NANPA via 988@somos.com when this milestone is completed. Include in email: Provider Name, OCN(s), State(s) and NPA(s).
9	Customer Education	Deadline to update carrier websites and social media	Update social media and external websites with information about the 82 NPAs that will transition to 10DD, noting the permissive 10DD effective date and the mandatory 10DD effective date so that customers can find relevant information.	Carriers (voluntary)	3/25/2021	30 days prior to permissive effective date	COMPLETE	
10	Technical	Deadline for BIRRRS/LEGR updates	All carriers must update their CO codes in BIRRRS/LEGR via their AOCN to reflect 10 digits for Terminating Digits at End Office (TD-EO) and 10 digits for Terminating Digits at Access Tandem (TD-AT).	Carriers	4/10/2021	14 days prior to permissive effective date		Effective date in BIRRRS should be no later than 9/24/2021
11	Technical	Provide carrier contact information	Provide carrier contact information to NANPA for troubleshooting of any permissive 10-digit dialing issues	Carriers	4/10/2021	14 days prior to permissive effective date		Provide carrier contact information via 988@somos.com. Include in email: State(s), Provider Name, Primary Contact, Telephone Number(s), Hours of Operation, Backup Contact/Escalations, Email Address and Telephone Number(s).
12	Customer Education	Deadline to issue first press release	Issue first press release	NANPA, FCC, Carriers	4/19/2021	5-7 days prior to permissive effective date		

13	Customer Education	Carrier updates of directories	Carriers that publish directories need to add advisory to directories to alert customers of mandatory 10-digit dialing effective date	Carriers that publish directories	4/24/2021	No later than permissive 10-digit dialing effective date for customers		
14	Technical	Distribute carrier contact list	Distribute carrier contact list to carriers so they can contact each other as needed to troubleshoot any permissive 10-digit dialing issues	NANPA	4/24/2021			
15	Technical	Carrier deadline to implement permissive 10-digit dialing	Carrier Deadline to have Permissive 10-Digit Dialing opened in their networks (Carriers can implement this any time up to this deadline, no need to wait until the night before to implement)	Carriers	4/24/2021	Same date as permissive 10-digit dialing effective date for customers		Carriers must notify NANPA via 988@somos.com when this milestone is completed. Include in email: Provider Name, OCN, State and NPA(s).
16	Customer Education	Permissive 10-digit dialing effective date for customers	Permissive Dialing Effective Date - Date communicated to customers as the earliest date they can start dialing 10 digits	Carriers	4/24/2021	All dates above are calculated from this date		
17	Customer Education	Deadline to develop verbiage for second customer notice	Develop and supply template for second customer notification, a simple message about the upcoming mandatory 10-digit dialing "effective date" to remind customers to continue practicing dialing 10 digits and to complete reprogramming CPE by the mandatory 10-digit dialing effective date. Message must remind customers of what they need to do to prep for mandatory 10DD. Carriers can then tweak as needed depending on whether they want to send the same message to call customers, tweak for business customers, tweak for customers in particular NPAs, etc.	NANPA	5/27/2021	150 days (5 months) prior to mandatory effective date	COMPLETE	Approved Mandatory Notice at 10/1/2020 meeting
18	Customer Education	Deadline to develop and send second round of special letters	Develop and send second round of "special letters" to Directory Publishers, Coin Operated Payphone Providers, Alarm Associations, Highway Call Box Operators, and 911 State/County Coordinators & PSAPs reminding them of the mandatory dialing effective date, and what each of these types of groups need to do to prep for mandatory 10DD. Supply these templates to industry as well in case carriers want to use them to supplement their own customer notifications.	NANPA	6/26/2021	120 days (4 months) prior to mandatory effective date		
19	Customer Education	Deadline to send second notice to PSAPs, PSALI and County Coordinators	Develop and send second/reminder notice to PSAPs, PSALI and County Coordinators of upcoming mandatory 10-digit dialing effective date and to update any speed calling or call forwarding numbers to 10 digits before that date.	911 Providers	6/26/2021	120 days (4 months) prior to mandatory effective date		
20	Customer Education	Deadline to develop verbiage for second press release	Develop and supply verbiage for a second Press Release to announce the mandatory 10-digit dialing effective date. Provide verbiage to industry, FCC and state commissions so they can issue press releases as well, as needed.	NANPA	7/26/2021	90 days (3 months) prior to mandatory effective date		
21	Customer Education	Deadline to re-send second round of special letters as a reminder	Send second round of "special letters" again to Directory Publishers, Coin Operated Payphone Providers, Alarm Associations, Highway Call Box Operators, and 911 State/County Coordinators & PSAPs, reminding them of the mandatory dialing effective date, and what each of these types of groups need to do to prep for mandatory 10DD. Supply these templates to industry as well in case carriers want to use them to supplement their own customer notifications.	NANPA	9/9/2021	45 days prior to mandatory effective date		
22	Customer Education	Deadline to refresh social media	Social media and website information updated regarding upcoming changes to dialing requirements due to Area Code Relief Refresh social media with information about the 82 NPAs that are transitioning to 10DD, noting the mandatory 10DD effective date so that customers can find relevant information.	Carriers (voluntary)	9/24/2021	30 days prior to mandatory effective date		
23	Customer Education	Deadline to send second customer notice	Issue second customer notification. Carriers using bill messages may want to have these run multiple months rather than just one month to help ensure customers are aware of the upcoming dialing changes.	Carriers	9/24/2021	30 days prior to mandatory effective date		Carriers must notify NANPA via 988@somos.com when this milestone is completed. Include in email: Provider Name, OCN(s), State(s) and NPA(s).
24	Technical	Deadline for 10-digit signaling transition	Carriers should be signaling/sending 10 digits of the called to party for all calls terminating in all end offices and access tandems in the area code.	Carriers	9/24/2021	30 days prior to mandatory effective date		Carriers must notify NANPA via 988@somos.com when this milestone is completed. Include in email: Provider Name, OCN(s), State(s) and NPA(s).
25	Customer Education	Send reminder to PSAPs, PSALI and County Coordinators	Send reminder notice to PSAPs, PSALI and County Coordinators of upcoming mandatory 10-digit dialing effective date and to update any speed calling or call forwarding numbers to 10 digits	911 Providers	9/24/2021	30 days prior to mandatory effective date		
26	Technical	Update and re-distribute carrier contact list	Distribute carrier contact list to carriers so they can contact each other as needed to troubleshoot any mandatory 10-digit dialing issues	NANPA	10/17/2021	7 days prior to mandatory effective date		
27	Customer Education	Deadline to issue second press release	Issue second Press Release	NANPA, FCC, Carriers	10/19/2021	5-7 days prior to mandatory effective date		

28	Customer Education	Mandatory 10-digit dialing effective date for customers	Mandatory 10-Digit Dialing Effective Date - Communicated to Customers (This is the earliest date that carriers can begin removing 7DD and enforcing 10DD)	Carriers	10/24/2021	All dates between the permissive dialing effective date and this date are calculated from this date		
29	Technical	Deadline to update carrier systems that dial 7-digit numbers to dial 10 digits	Carriers to update all speed calling, call forwarding numbers and voicemail options in embedded databases to include the area code and reflect 10-digit dialing. Carriers to update any N11 calls translated to 7-digits to include the area code and reflect 10-digit dialing.	Carriers	TBD by each carrier	30 days prior to carrier-specific mandatory enforcement date		
30	Technical	Deadline to have recorded announcements in place	Verify that switch can handle the recorded announcement and also that the announcement can be understood as that is what the customers will be hearing if they forget to dial 10 digits.	Carriers	TBD by each carrier	30 days prior to carrier-specific mandatory enforcement date		Wireless and VoIP can implement a recorded announcement advising a customer that dials 7 to hang up and dial 10 (include the area code). Legacy wireline may not be able to implement such a recorded announcement though. In a legacy wireline switch, after mandatory 10-digit dialing is enforced and 988 is implemented as an abbreviated dialing code (likely at the same time), if a customer dials 988-XXXX, the call will route to the hotline. If the customer dials 988, the call will route to the hotline. If the customer dials NPA-988-XXXX, the call will complete to NPA-988-XXXX.
31	Technical	Build E911 Network/Tandem Translations	Build E911 Network/Tandem Translations	911 Providers	TBD by each carrier	30 days prior to carrier-specific mandatory enforcement date		Ask 911 providers if this should be 30 days prior to mandatory effective date (communicated to customers) or 30 days prior to carrier-specific mandatory enforcement date
32	Technical	Verify PSAP work	Get confirmation from PSAPs that all PSAP work has been completed	911 Providers	TBD by each carrier	30 days prior to carrier-specific mandatory enforcement date		Ask 911 providers if this should be 30 days prior to mandatory effective date (communicated to customers) or 30 days prior to carrier-specific mandatory enforcement date
33	Technical	Carrier deadline to implement mandatory 10-digit dialing	Carrier Deadline to Enforce Mandatory 10-Digit Dialing (carriers have the interval between the mandatory 10DD effective date above and this deadline to remove 7DD and enforce 10DD on the schedule that works best for them)	Carriers	7/15/2022			Carriers must notify NANPA via 988@somos.com when this milestone is completed. Include in email: Provider Name, OCN(s), State and NPA(s).