

**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) **Case No. TO-2021-0155**

STAFF’S SECOND STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Second 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 filed its first *Status Report* May 3, 2021. Staff now files a *Second Status Report* memorandum in this docket, attached here as Appendix 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 *Second Status Report* and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted

/s/ Ron Irving

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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 5th day of April 2022, to all counsel of record.

/s/ Ron Irving

MEMORANDUM

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

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

Date: April 5, 2022

Subject: Second Staff Status Report

This report provides an update on the status of the transition from seven-digit dialing to ten-digit local dialing for four Missouri area codes to ensure that users can dial “988” to access the national suicide prevention and mental health crisis hotline. The North American Numbering Plan Administrator (NANPA) is tracking the industry’s progress in meeting five key milestones.¹ Carriers are required to report to NANPA after a carrier completes each of these five milestones. In turn, NANPA is posting state-specific results on its website.

NANPA’s results posted on its website inflate company report rates. For example, in some instances the number of companies reporting completion of a milestone in a specific area code is higher than the number of companies assigned telephone numbers within the area code. According to NANPA officials, this observation is due to some companies reporting in every area code, even if they do not have numbering resources in all four area codes. NANPA does not attempt to adjust the results accordingly. In addition, NANPA does not attempt to contact any non-reporting companies.

Staff has obtained lists of Missouri companies failing to report completion of milestones and followed up with nonresponding companies authorized with the Missouri Commission to provide telecommunications or IVoIP service. This follow up revealed many companies simply failed to notify NANPA or were not aware of the reporting process. Staff’s efforts prompted some companies to report the completed milestones. The five milestones requiring company responses are identified below along with the completion due date and reporting results as of March 31, 2022. These results reflect Staff’s adjustment to correct the previously described problem with the report rates identified on NANPA’s website.

¹ www.nationalnanpa.com. Click-on “Transition to 10-Digit dialing for 988” and then “Progress by State/Area Code”.

Milestone	Milestone Completion Due date	Adjusted Reported Rate ²
Milestone 8: Deadline to send first customer notice	3/25/2021	84%
Milestone 15: Carrier deadline to implement permissive 10-digit dialing	4/24/2121	88%
Milestone 23: Deadline to send second customer notice	9/24/2021	74%
Milestone 24: Deadline for 10-digit signaling transition	9/24/2021	76%
Milestone 33: Carrier deadline to implement mandatory 10-digit dialing	7/15/2022	18%

The last milestone requires companies to report to NANPA after implementing mandatory 10-digit local dialing or stated differently, eliminating 7-digit local dialing. Companies can remove 7-digit dialing and enforce 10-digit dialing as early as October 24, 2021 but no later than July 15, 2022. This gives companies the flexibility to eliminate 7-digit local dialing sometime during an approximate nine-month time-period. Companies are to report to NANPA the completion of this milestone, but are not required to indicate the date of completion or provide any advance notice to NANPA of the anticipated date. As indicated in the table above only 18% of companies have reported that they have mandatory 10-digit local dialing.

Staff intends to continue to be in contact with NANPA officials, participate in monthly meetings arranged by NANPA with the telecommunications industry and keep the Commission apprised of any problems or issues should they develop.

² The adjusted report rate removes a company reporting the completion of a milestone for an area code if the company does not have telephone numbering resources in the area code. Consequently, these adjusted report rates will be lower than the report rate identified on NANPA’s tracking report.