



**Testimony of  
Mike Blank  
CTIA**

**In Opposition to  
New Hampshire SB 603**

**Before the  
New Hampshire House Committee on Science, Technology and Energy**

**April 15, 2024**

On behalf of CTIA®, the trade association for the wireless communications industry, I submit this testimony in opposition to assessment required in Senate Bill 603, which seeks to promote telephone number conversation measures by imposing an unfair assessment on wireless providers.

We recognize this legislation is part of ongoing efforts by the state to preserve numbering resources in the 603 area code, which the North American Numbering Plan Administrator (NANPA) projects is likely to exhaust its numbers as early as 2027 and requires a second area code in the state. While CTIA understands there are many people in the Granite State who believe the 603 area code holds significance for the state's identity and branding, we do not believe the wireless industry should be assessed by the DOE to fund the efforts by the state to prevent the introduction of a new area code.

CTIA and its member companies have a good working relationship with the DOE and have not taken action to prevent efforts focused on maintaining the 603 area code. We are concerned this bill would place an additional and unnecessary burden on the companies that are already working in good faith with the Department of Energy to conserve numbering resources. Too, previous attempts to delay the exhaust of the area code in 2000 and 2011 have been successful without requiring an assessment placed on members of our industry. Further, without a clear understanding of how the



assessment will function or work, we are concerned the estimated costs could increase in the future or disproportionately affect some carriers more than others. Our customers could also unnecessarily face the largest percentage of investigation costs despite our industry's cooperation.

We also understand that SB 603 was inspired by other area code conservation efforts in New England, including Maine's effort focused on curbing robocallers and forecasting and block request practices. However, the Maine legislation did not provide assessment authority to the Maine PUC to conduct its efforts. CTIA and its members have been working closely with Maine to help in the State's goal of utilizing numbers efficiently, and our members have also done this in New Hampshire.

Our members also work with the Federal Communication Commission ("FCC"), which has exclusive jurisdiction over the telephone numbering system in the United States.<sup>1</sup> But no matter how much effort is expended by the Legislature and the DOE, whether New Hampshire will eventually require a second area code is an issue that will ultimately be determined by population trends, federal numbering regulations, and legacy considerations such as the large number of rate centers for local wireline providers in the state, a large percentage of which have been exempted from numbering optimization measures.

For all the reasons discussed above, CTIA respectfully requests that you not place the burden of an assessment on the wireless industry or consider alternative mechanisms for funding. Thank you for your consideration.

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<sup>1</sup> See 47 C.F.R. §52.3.