



April 19, 2024

The Honorable Michael Vose  
Chairman  
New Hampshire Committee on Science, Technology and Energy  
107 N. Main Street  
Concord, NH 03301

CC: Members of the New Hampshire Committee on Science, Technology and Energy

**Re: Opposition to Senate Bill 603**

Dear Chair Vose:

On behalf of CTIA®, the trade association for the wireless communications industry, I write in opposition to the 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.

This issue goes back over 25 years to when the FCC implemented a variety of conservation measures and relief to extend the life of the North American Numbering Plan and conserve individual area codes. New Hampshire has known since 1998 that the 603 area code was in jeopardy. This is more than enough time for the DOE and the New Hampshire General Court to identify other funding sources already in place for any area code conservation efforts.

Previous attempts to delay the exhaustion 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.

In a 2019 petition<sup>1</sup> by the New Hampshire Public Utilities Commission (NH PUC), it requests the FCC to delegate to it the authority to do individual telephone number pooling to further preserve the 603

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<sup>1</sup> [www.puc.nh.gov/telecom-files/20190426-NHPUC-ITN-Petition-to-FCC.pdf](http://www.puc.nh.gov/telecom-files/20190426-NHPUC-ITN-Petition-to-FCC.pdf)



area code. In this document, the NH PUC states that “the chief source of the problem is the inefficient way in which numbering resources are allocated, requiring the assignment of 1,000 numbers to requesting carriers...” If the problem is an inefficient Federal system – not action being taken by our industry – then our industry, and potentially our customers, should not have to assume the cost.

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 and others in the state to conserve numbering resources.

While we understand the total amount of the assessment may not be considered significant to some, the precedent of this assessment authority carries great significance to our industry. We are concerned about the precedent being set as it could lead to DOE requesting funds from the wireless industry any time it needs additional funding or specifically didn’t receive funding from the state. The DOE has no other assessment authority over our industry, and the state should not utilize the need for a de minimis amount of funding to create a new and unprecedented authority for DOE.

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>2</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 and consider alternative mechanisms for funding.

Sincerely,

Mike Blank  
Director of State Legislative Affairs

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<sup>2</sup> See 47 C.F.R. §52.3.