Docket No. 2023-00009

November 1, 2024

MAINE PUBLIC UTILITIES COMMISSION COMMENTS OF CTIA Investigation into the Feasibility of Large-Scale Rate Center Consolidation

CTIA submits the following comments in response to the Maine Public Utilities

Commission's ("Commission's") October 11, 2024 Examiner's Report in the above-captioned proceeding.

The Commission has undertaken significant efforts to extend the life of Maine's single area code, the 207 NPA, and wireless providers have supported these efforts by working cooperatively with the Commission to identify numbering resources for conservation. The Examiner's Report, if adopted, would authorize Consolidated to consolidate all of its rate centers in the 207 NPA into one unified rate center. The complex process of consolidating Consolidated's 135 rate centers into a single rate center will have impacts on and require efforts from Consolidated; all Maine telecommunications providers, including CTIA's wireless service provider members; many telecommunications providers outside of Maine; and entities like the North American Numbering Plan Administrator ("NANPA"). To that end, CTIA has two suggestions that will help ensure a smooth transition.

First, the Examiner's Report does not address the timeline for rate center consolidation, only mentioning that Consolidated had targeted the end of 2025 in its July 2023 comments.¹

Because this transition will require work on the part of a great number of stakeholders, timelines

.

¹ Examiner's Report at 17.

must take into account steps that are within Consolidated's control to implement as well as ones that will require effort from other parties. If the Commission adopts the recommendations of the Examiner's Report, it should work with all affected stakeholders to develop a timeline that ensures providers have the time necessary to implement each step of the transition based on provider feedback.

Second, if the Commission adopts the recommendations of the Examiner's Report, it should (or should require Consolidated to) make available a list of the 135 rate centers that are to be consolidated, including the name and other appropriate information regarding the single rate center to be created. This step would greatly facilitate advance preparations for consolidation work. This information must also be provided to NANPA so it can make the necessary changes in its administrative systems to support consolidation and ensure providers receive appropriate, updated notifications where necessary.

By taking these steps in advance, the Commission can best ensure a smooth consolidation process that minimizes the impact on providers and is appropriately seamless for consumers.

Respectfully submitted,

By: _____/s/ Matthew DeTura

Benjamin Aron Matthew DeTura CTIA 1400 16th Street NW Suite 600 Washington, D.C. 20036 (202) 736-3228 BAron@ctia.org MDeTura@ctia.org

November 1, 2024