

October 11, 2024

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

EXAMINER'S REPORT

NOTE: **This Examiner's Report contains the recommendation of the Commission Staff. Although the Examiner's Report is in the form of a draft Commission Order, it does not constitute Commission action. Interested persons may file comments or exceptions to this Examiner's Report on or before 4:00 p.m., Friday, November 1, 2024.**

I. SUMMARY

By this Order, the Commission concludes that large-scale consolidation of rate centers assigned to Consolidated Communications of Northern New England Company, LLC (Consolidated or the Company) in the 207 area code is economically and technically feasible and is in the public interest. Based on these conclusions, the Commission authorizes Consolidated to consolidate its rate centers in the 207 area code into one unified rate center.

II. BACKGROUND

A. How Telephone Numbers Work

At the most basic level, telephone numbers are merely unique identifiers for specific telephones. When you dial a telephone number, you are essentially entering a

unique code that tells the telephone network where to send your call. In North America, telephone numbers have geographic significance based on the three distinct groups of digits that make up the telephone number. Those three distinct groups of digits consist of two groups of three numbers and one group of four numbers as in, for example, the Commission's telephone number: 207-287-3831. The first three-digit group is technically known as the Numbering Plan Area but is known colloquially as the "area code." This is the 207 in the Commission's telephone number. The area code is used to direct calls to a large geographic area—in Maine that geographic area is the entire state—and contains approximately 8,000,000 usable telephone numbers.

The second three-digit group is technically called the "NXX Code" but is also known as the "exchange"; this would be the 287 in the Commission's telephone number. Each exchange is assigned to a specific geographic area called a "rate center." In Maine, rate centers often, but not always, conform to existing municipal boundaries. Rate centers, like municipalities, can vary greatly in size, population, and, importantly for the purposes of this investigation, the number of assigned exchanges. A rate center with a small population may only have one or two exchanges; a large-population rate center, Portland for example, may have over 100 exchanges. Thus, exchanges are used to direct calls to a specific rate center within an area code.

Each exchange contains approximately 10,000 usable telephone numbers which are broken up into 10 "blocks" of 1,000 numbers each. A four-digit number from a block is used to set the last four digits of a telephone number and is called the "line number."

This is the 3831 in the Commission's telephone number. Taken together with the area code and the exchange, the line number is used to direct a call to a specific telephone.

Control of North America's supply of area codes, exchanges, and line numbers is vested in the North American Numbering Plan Administrator (NANPA) which maintains a "pool" of unused area codes, exchanges, and blocks of 1,000 line numbers.

B. Maine's Dwindling Number Problem

Maine is one of a small number of states with one state-wide area code, and the number of states with only one area code is in decline. Unfortunately, according to projections from NANPA, the 207 area code could run out of unused numbers in the numbering pool by the Fourth quarter of 2033.¹ If an area code is close to running out of unused numbers in the numbering pool, that area code is said to be "exhausted." Exhaustion is driven by at least four factors: first, there is the actual assigned and in-service usage of telephone numbers in an area code; second, there are numbers which are in the inventory of a service provider but are not in service because they are essentially "spares" held by the service provider for expected future customers; and third, disconnected customer numbers which need to "age" a minimum amount of time

¹ https://nationalnanpa.com/reports/2024-1_NPA_Exhaust_Projections_Final.pdf

before they can re-assigned by a service provider to a new customer; the fourth factor is the availability of unused exchanges.^{2,3}

NANPA officially considers an area code to be exhausted when, based on current usage and forecasted demand, the area code is around three years from having insufficient unused numbers left in the pool. As discussed below, the current program for assignment of exchanges and blocks can bring about exhaustion earlier than would otherwise be necessary.

As an illustration of the early exhaustion problem, NANPA puts the actual utilization of numbering resources within Maine's 207 area code at about 37%, but NANPA also forecasts that 207 is in imminent danger of exhaustion. How can this be? One factor is service providers' anticipated needs for future numbers. Another factor is the way that numbers are assigned. Currently, when a provider needs line numbers in a given exchange—as discussed above, an exchange is assigned to a rate center which is a geographic area within an area code—the provider is given a 1,000-line number block in that exchange. If the provider utilizes more than 100 of those numbers,

² A “service provider” is essentially any company that provides telephone service using telephone numbers. A service provider could be a classic landline company like Consolidated Communications, a mobile telephone company like Verizon or T-Mobile, or a voice over Internet protocol (VoIP) company such as a traditional cable television or broadband company like Spectrum or Comcast, or a stand-alone VoIP company like Vonage or Ooma.

³ The 207 Area Code currently has 38 remaining unused exchanges.

that block is considered "contaminated," and the block is then generally reserved for the exclusive use of that provider.⁴ This clearly leads to inefficiencies.

As an extreme example, let's take a hypothetical 555 exchange located in the Maintown rate center, population 2,500. If five providers (one traditional land line provider, one cable telephone provider, and three cellular providers) each have two blocks in Maintown's 555 exchange, and each provider is using only 101 numbers in each of their blocks, then you would end up with a situation where 1,010 line numbers would actually be utilized out of the potential 10,000 line numbers in the Maintown 555 exchange, but no other providers could obtain numbers in that exchange because all ten line number blocks are "contaminated." The Maintown 555 exchange would be "full" even though nearly 90% of the line numbers are currently unused. This same scenario occurs at a large scale with exchanges.

To continue with the Maintown example: because Maintown's 555 exchange is now "full" while only utilizing around 10% of the line numbers, if another provider (for example another cellular carrier) needs line numbers in Maintown, NANPA will have to open a second exchange in the Maintown rate center, thus taking 10,000 additional line numbers and reserving them for Maintown's exclusive use. Now Maintown's 2,500 people have tied up 20,000 numbers. Granted, Maintown is an extreme

⁴ Providers may return unused numbers in uncontaminated blocks (*i.e.*, number blocks where less than 100 of the 1,000 numbers are being used) back to the pool for assignment to other providers.

example, but it does illustrate how Maine's 207 area code can have 37% actual utilization but still be in imminent threat of exhaustion.

One action to forestall exhaustion is "rate center consolidation." As explained above, area codes are broken up into smaller geographic areas represented by geographically defined rate centers. At a high level, rate center consolidation means the combining of two or more rate centers into one, geographically larger rate center.

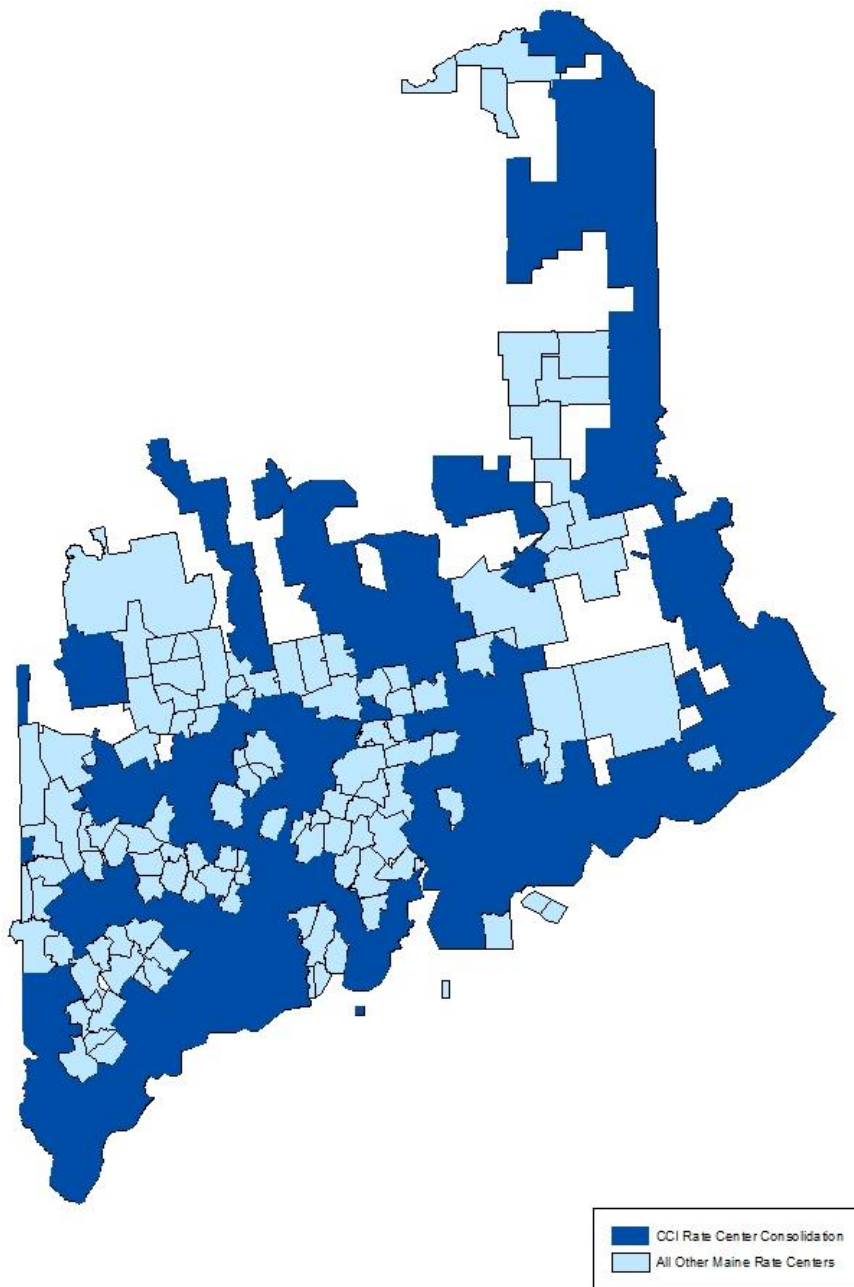
The following is an oversimplified example of rate center consolidation, using the Maintown hypothetical from above: Maintown's neighbor, Dirigoville, population 2,500, is located in its own rate center and has its own exchange: 111.⁵ In Dirigoville, however, there are only two service providers using two 1,000-line number blocks each; Dirigoville, then, has six blocks, or 6,000 numbers, available. So, if Maintown and Dirigoville were to merge their rate centers, the 555 and 111 exchanges would both serve the new larger rate center. Thus, if an additional service provider enters the new Maintown-Dirigoville rate center, that service provider can be assigned one of the six available blocks in one of the 111 exchanges, and there will not be a need to open a new exchange.

Maine currently has 249 rate centers. Consolidated Communications, the largest carrier in Maine, is the dominant carrier in 135 of those rate centers. These rate centers, typically in more urban areas of the state, are also where the most requests for

⁵ So, all of Dirigoville's telephone numbers would be 207-111-XXXX (0000 to 9999).

numbers occur. By way of example, as of August 2024, the Bangor, Maine rate center does not have any blocks of numbers available for use. Under the rate center consolidation plan in this Order, Bangor's rate center would become part of a larger rate center encompassing what is currently 135 separate rate centers. The plan would thus make available an estimated 336 number blocks, or 336,000 telephone numbers. The following map outlines the geographic footprint of the proposed rate center consolidation.

Proposed Rate Center Consolidation



The darker blue areas would be Consolidated Communications' 135 rate centers merged into one rate center. The remaining 114 rate centers, which are managed by

other rural carriers including would remain unchanged.

C. Commission Number Conservation Efforts

Maine's 207 Area Code was one of the first area codes put into service in 1947, and as such it was designed for a different time when there was greater emphasis on the geographical areas delineating toll calls for both in-state and out-of-state long-distance calls.⁶ Traditional toll calling and Maine's overall geographic size contribute to there being 249 rate centers across the state. Additionally, these historical rate centers were designed at a time when there was only one monopoly telephone service provider to manage local and long-distance calls. The telecommunications marketplace has undergone significant change with the advent of competition in the local and long-distance marketplace. More modern communications technologies such as cellular telephone service and VoIP have also seen explosive growth. Accordingly, the number of service providers in Maine today far exceeds what the architects of Maine's original numbering plan for 207 could ever have envisioned. To address this explosive growth,

⁶ Historically, back when houses had land-line telephones and there were primarily only monopoly telephone companies, it was common for the price you paid for telephone service to include unlimited calling only to telephone numbers within your rate center and some adjacent or nearby rate centers. This unlimited calling area was called a basic service calling area. For example, if you lived in Hallowell, Augusta might have been in your basic service calling area and calls to Augusta would be included in your service plan for no additional charge. However, if you made a call to a telephone number outside of your basic service calling area you would incur an extra charge. This extra charge was called a "toll." The toll was typically a per-minute charge that would be added to your phone bill. Today, due to technological advances and the advent of competition in the communications marketplace, the overwhelming majority of telephone service plans include unlimited nationwide calling for one flat price, with no tolls.

the Commission has, for the past several years, been engaged in efforts to preserve the 207 area code.

1. Number and Exchange Reclamation

To maximize the availability of numbers for all service providers, the Commission has exercised its authority in accordance with 47 C.F.R. § 52.20(c) to make certain that service providers are promptly and properly returning unused or under-utilized blocks to the 207 numbering pool. These efforts have led to the return of 750,000 numbers to the numbering pool. In addition, the Commission has worked with service providers to return unused exchanges to NANPA. As a result, as of August 2024, Maine now has 38 available exchanges.⁷ Because of these efforts, the exhaustion of the 207 area code has been extended from the second quarter of 2025 to the fourth quarter of 2033. More than an eight-year reprieve.

While 207 has come close to technical exhaustion in recent years, the reality is that there are a lot of numbering resources in 207 still available to be used. Due to the inefficiencies described above Maine is only utilizing 37% of its numbering resources. Put another way, there are around eight million numbers available in an area code, but service providers are only using about three million of those numbers.

⁷ https://www.nationalnanpa.com/reports/reports_cocodes.html

2. Number Conservation

In addition to encouraging service providers to return blocks to the numbering pool, the Commission has investigated the numbering practices of providers who may be violating or misusing federal numbering rules.

Another tool that has helped the Commission extend Maine's area code is the Voluntary Transfer of Thousands-Blocks. If a provider needs a thousands-block, but one is not available, then Commission Staff review block information to identify a provider with multiple blocks. Staff looks for a block one that is "over-contaminated" (*i.e.*, has more than 100 of the 1000 numbers in use) but still has hundreds of unused numbers. While these blocks are not "available" in the numbering pool, industry rules allow a carrier to transfer an "over-contaminated" block directly to another carrier. The Commission has prevented at least 20 new exchanges from being created using this process. Without this tool, Maine would likely have started the process for a new area code by now.

The Commission has also worked with several states, service providers, federal authorities, and Maine's Congressional delegation to encourage the use of a more modern pooling system known as individual telephone number (ITN) pooling, which would allow NANPA to assign numbers to providers on an individual number "as needed" basis rather than in blocks of one thousand. Commission Staff are currently

participating in a variety of North American Numbering Council (NANC) working groups to encourage the use of a range of number conservation efforts.⁸

The Commission is also working to migrate providers who are using phone numbers for things like automobile hotspots and other mobile Internet connected devices from using phone numbers in geographic area codes like 207 to non-geographic area codes (1-800 numbers are a good example of a “non-geographic” area code). Transitioning future customers away from using geographic area code numbers could help prevent area code exhaust in not just Maine, but also in other states.

Without meaningful number conservation efforts, North America could run out of area codes by 2054 or sooner. If that happens then the entire North American numbering system would have to be re-configured to accept 12-digit phone numbers, as opposed to the current 10 digits. The effort involved to re-program the continent's telecommunications infrastructure would be herculean and have a global impact on consumers and businesses.⁹

⁸ Commission Staff are currently participating on the Numbering Administration Oversight Working Group (NAOWG), Internet of Things (IOT) Working Group and the Call Authentication Trust Anchor (CATA) Working Group.

⁹ According to the Federal Communications Commission, in 1999, the NANC estimated the total societal cost of expanding the universe of numbering resources would be \$50-\$150 billion. Adjusted for today, the cost could be roughly \$90-\$270 billion.

D. Procedural Background

1. Notice of Investigation

Based on the number conservation efforts and initiative described above, on January 25, 2023, the Commission opened an investigation to determine the feasibility of large-scale rate center consolidation in the 207 area code, and, if appropriate, order such consolidation. *Maine Public Utilities Commission, Investigation into the Feasibility of Large-Scale Rate Center Consolidation*, Docket No. 2023-00009, Notice of Investigation (Jan. 25, 2023).

In the Notice of Investigation, the Commission explained its view that rate center consolidation represented an achievable solution to extend the life of the 207 area code for years to come. The Commission explained that control of rate centers was originally “assigned” to what are known as incumbent local exchange carriers, or “ILECs.” Essentially, ILECs are the historic monopoly providers of land-line telephone service. Each ILEC’s monopoly service territory consisted of a given number of rate centers and these rate centers constituted the geographic service territory of each ILEC. To this day, each one of Maine’s 249 rate centers is controlled by one of Maine’s 24 remaining ILECs. Maine’s largest ILEC is Consolidated.

Because Consolidated is by far the largest ILEC, it is not surprising that most of the requests for numbering resources occur in Consolidated’s service area.

Commission Staff reached out to Consolidated in May 2022 to discuss possible consolidation of some of Consolidated's largest rate centers, proposing to consolidate 98 rate centers into 13. Consolidated then put forward for discussion an alternative rate center consolidation plan that would combine the majority of Consolidated's rate centers into one very large rate center. By folding most or all of its rate centers into one large rate center, Consolidated indicated that it could gain operational efficiencies and long-term operational cost savings.

The Commission also explained, however, that while the Commission agrees with Consolidated that, conceptually, large scale rate center consolidation is a viable solution to indefinitely preserve the 207 area code, the Commission is also cognizant of the potential impacts large-scale rate center consolidation could have on other service providers in Maine that all utilize the same telecommunications network. Accordingly, stated its view that it is important to comprehensively investigate these impacts and provide affected service providers with an opportunity to engage in this effort.

2. Investigatory Process

On April 13, 2023, Commission Staff issued a Procedural Order scheduling an initial case conference and providing a May 8, 2023, deadline for interested parties to intervene in this investigation. The Commission received timely intervention petitions from the Office of the Public Advocate (OPA); Biddeford Internet Corp. d/b/a "GWI" (GWI); Comcast Phone of Maine, LLC (Comcast); CTIA – The Wireless Association®

(CTIA); Mid-Maine Telplus LLC, CRC Communications LLC, Mid-Maine Telecom LLC, Pine Tree Telephone LLC, and Saco River Telephone LLC, (collectively GoNetspeed); and Consolidated.

Commission Staff convened the initial case conference on May 9, 2023. At the case conference, the Hearing Examiners granted all the timely-filed petitions to intervene.¹⁰ The Commission's Advisory Staff (Staff) also discussed process and scheduling for the proceeding.

On May 15, 2023, the Hearing Examiner issued a procedural schedule for the first portion of the proceeding.

Pursuant to the procedural schedule, Consolidated made its initial filing on July 7, 2023. In its filing, consolidated provided an explanation and overview of how the rate center consolidation process would work from a technical perspective. Consolidated also discussed the work that would be necessary for the Company to complete to effectuate rate center consolidation and described a general timeline for completion of the consolidation.

¹⁰ The Commission subsequently received late-filed petitions to intervene from Time Warner Cable Services (Maine), LLC (Charter); Oxford County Telephone Company and Oxford West Telephone Company collectively d/b/a FirstLight (FirstLight), and the Telecommunications Association of Maine (TAM). The Hearing Examiner granted, without objection, Charter's petition on August 3, 2023, FirstLight's petition on August 11, 2023, and TAM's petition on August 15, 2023.

On August 11, 2023, Charter, Comcast, OPA, GoNetSpeed, CTIA, and TAM all filed comments. While the comments of all of the parties were not identical, all parties generally raised concerns about the implementation of rate center consolidation and encouraged the Commission to further engage the parties and Consolidated to bring more clarity to the proceeding.

On September 7, 2023, the Hearing Examiner issued a Procedural Order that scheduled a workshop for the parties to further discuss consolidation and proposed several topics for discussion at the workshop.

The Hearing Examiner convened the workshop on September 22, 2023. After robust discussion among the parties, Consolidated agreed to make an additional informational filing that would discuss the technical steps necessary to effectuate rate center consolidation, and descriptions of the various scenarios for the exchange of traffic, pre- and post-consolidation. Consolidated filed its further comments on November 13, 2023.

On January 5, 2024, the Hearing Examiner issued a Procedural Order providing an opportunity for further comment from the parties and requesting input on what, if any, further process would be necessary in this proceeding.

The OPA, on January 18, 2024, and Comcast, TAM, and Consolidated, on January 19, 2024, filed comments responsive to the January 5, 2024, Procedural Order.

The OPA, Comcast, and TAM all requested that the Commission allow for additional discussion regarding cost and technical implementation. Consolidated stated that it had provided through the course of the proceeding, in written submissions and at conferences and workshops, all of the information that it is able to provide in advance of beginning to implement consolidation.

III. PARTY COMMENTS

The following companies and organizations filed written comments in this proceeding: Consolidated, OPA, Charter, Comcast, GoNetSpeed, TAM, and CTIA.

A. Consolidated

In its July 7, 2023, comments, Consolidated described the collaborative and cooperative work done by Consolidated and Staff prior to the initiation of this proceeding. Further, Consolidated described the process it would undertake to consolidate its rate centers, and the work necessary to effectuate the consolidation. At the time of filing, Consolidated estimated that it could complete the project by the end of 2025.

In its November 5, 2023, comments, Consolidated described in greater detail the technical changes that it will need to make to implement consolidation. Consolidated

also described how call routing will work post-consolidation and that, post-consolidation, Consolidated will treat all calls within the 207 area code as local calls.

In its January 19, 2024, comments, Consolidated reiterated its willingness to implement consolidation, but that it had no additional information to add to this proceeding beyond the detailed information it had already provided.

B. OPA

In its August 11, 2023, comments, the OPA expressed its willingness to engage in the consolidation process and that the OPA would appreciate a description of any operational efficiencies or cost savings that Consolidated expected to achieve through consolidation.

In its January 19, 2024, comments, the OPA stated its appreciation for the technical explanations provided by Consolidated regarding consolidation, but reiterated its preference that Consolidated explain any operational efficiencies or cost savings that Consolidated expected to achieve through consolidation.

C. Charter

In its August 11, 2023, comments, Charter raised several questions regarding how consolidation would be achieved and the effect of consolidation on other

stakeholders, in particular wholesale customers and carriers exchanging traffic with Consolidated in the new larger rate center.

D. Comcast

In its August 11, 2023, comments, Comcast stated that it appreciated the Commission's efforts to extend the life of the 207 area code and that it looked forward to working with the other stakeholders to achieve consolidation.

In its January 19, 2024, comments, Comcast requested that Consolidated provide a detailed timeline of the steps necessary to achieve consolidation.

E. GoNetSpeed

In its August 11, 2023, comments, GoNetSpeed raised concerns regarding financial impacts on voice service providers in Maine vis a vis the management of toll charges between carriers and Consolidated and technical impacts on voice service providers.

F. TAM

In its August 11, 2023, comments, TAM requested assurance that its members would not also be required to consolidate their rate centers. TAM also raised concerns about customer confusion regarding calling areas and the management of toll charges.

In its January 19, 2024, comments TAM expressed a desire to engage in one-on-one communication with Consolidated regarding the proposed consolidation.

G. CTIA

In its August 11, 2023, comments, CTIA urged flexibility in the consolidation implementation timelines so as to allow all stakeholders sufficient time to make the necessary adjustments to their systems. CTIA also encouraged the Commission to consider any potential impacts on public safety, as well as sharing the concerns of other commenters regarding the management of toll charges.

IV. DISCUSSION AND DECISION

While the rate center consolidation proposed here in Maine is large in scale, rate center consolidation is not a new or unique concept.¹¹ By way of example, rate center

¹¹ The FCC has consistently maintained that state commissions have the inherent authority to order rate center consolidation without specific authority from the FCC. *Re: Efficient Use of Telephone Numbering Resources*, Docket No. NOI-00-3, Order Initiating

consolidation has occurred in Kansas,¹² Colorado,¹³ Iowa,¹⁴ Idaho,¹⁵ and Nebraska.¹⁶ In addition, the FCC has encouraged states to further number conservation efforts by “consolidat[ing] rate centers whenever possible.” *Second Report and Order, Order on Reconsideration*, CC Docket No. 96-98 and CC Docket No. 99-200, and *Second Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 00-429, rel. Dec. 29, 2000, ¶147.¹⁷

Inquiry, 2000 WL 1676413 at 2 (Iowa U.B. Oct. 11, 2000) (citing, e.g., *In the Matter of Massachusetts Dept. of Telecommunications and Energy's Petition for Waiver*, CC Docket No. 96-98, FCC 99-246, NSD File No. L-99-19 (Sept. 15, 1999)).

¹² *In the Matter of a General Investigation into Number Conservation Measures*, Docket No. 01-GIMT-552-GIT, Order 3: Discussion FCC Third Report and Order in the Numbering Resource Optimization Docket and Directing Rate Center Consolidation in the Kansas City, Kansas, Topeka, and Wichita Metropolitan Calling Areas, 2002 WL 35451845 *Kan. S.C.C. Mar. 14, 2002) (Kansas RCC Order).

¹³ *Re: Rate Center Consolidation*, Docket No. 97M-548T, Decision and Order, 1998 WL 274516 (Colo. P.U.C. May 5, 1998) (Colorado RCC Order).

¹⁴ *In Re: Qwest Corporation d/b/a CenturyLink QC*, Docket No. TF-2014-0038, Order Approving Rate Center Consolidation, 2014 WL 1762074 (Iowa U.B. May 1, 2014) (Iowa RCC Order).

¹⁵ *In the Matter of the Investigation into Rate Center Consolidation for Qwest Corporation in Southern Idaho to Conserve Available NXX Codes*, Docket No. USWT9921 28943, Order, 2001 WL 34819416 (Idaho P.U.C. Feb 1, 2002) (Idaho RCC Order).

¹⁶ *In the Matter of the Commission, on its Own Motion, to Review the Qwest Corporation Rate Center Consolidation Plan*, Application Nos. C-3447 & PI-101, Order Approving Rate Center Consolidation, 2005 WL 7145629 (Neb. P.S.C. Aug 30, 2005) (Nebraska RCC Order).

¹⁷ State commissions have approved several rate other rate center consolidations in recent years in addition to the consolidations discussed in this Order. NANPA, Rate Center Consolidations 2005 to the Present (available at https://nationalnanpa.com/number_resource_info/Summary-of-Rate-Center-Consolidations.pdf) (describing 27 rate center consolidations in Arkansas, Minnesota, Texas, Utah, New York, Nebraska, South Dakota, Washington, Arizona, Oklahoma, Iowa, Alabama, Colorado, North Dakota, Florida, and New Mexico).

In Kansas, the Kansas State Corporation Commission (KSCC) implemented rate center consolidation by ordering the applicable ILEC to consolidate the rate centers in the state's largest metropolitan areas: Kansas City, Topeka, and Wichita. Kansas RCC Order, ¶ 16. The KSCC based its order on a review of comments submitted by interested parties. *Id.* ¶ 1, 3.

In Colorado, the Colorado Public Utilities Commission (CPCC) implemented rate center consolidation by ordering the applicable ILEC to consolidate the 43 rate centers in the 303 area code into 16 rate centers.¹⁸ Colorado RCC Order, § D(2). The CPUC based its order on a hearing and evidence submitted by interested parties. *Id.* § A(4).

In Iowa, the Iowa Utilities Board (IUB) implemented rate center consolidation by ordering the applicable ILEC to consolidate the rate centers in Des Moines, Iowa's largest city. Iowa RCC Order at 2. The IUB based its order on a simple review of submissions from the ILEC. *Id.* at 1.

In Idaho, the Idaho Public Utilities Commission (IPUC) implemented rate center consolidation by ordering the applicable ILEC to consolidate 37 rate centers into 8 rate

¹⁸ The CPUC found that consolidating all 43 rate centers into one rate center would be optimal from a number conservation perspective, the CPUC declined to order this consolidation to accommodate local calling areas to the greatest extent practicable. Colorado RCC Order, § D(3). The CPUC issued the Colorado RCC Order in 1998; in today's telecommunications landscape, with the overwhelming majority of telephone customers enjoying unlimited flat-rate calling not only locally but nationwide, the preservation of local calling areas is of far less concern. The CPUC was also concerned about increases in rates for local calling that may result from rate center consolidation. *Id.* § D(7). Again, this is a far less compelling concern in 2024.

centers. Idaho RCC Order at 8. The IPUC based its order on a review of comments from interested parties. *Id.*

In Nebraska, the Nebraska Public Service Commission (NPSC) implemented rate center consolidation by ordering the applicable ILEC to consolidate the rate centers in Omaha, Nebraska's largest city. Nebraska RCC Order at 2. The NPSC based its order on comments from interested parties. *Id.* at 1.

All of the above examples of rate center consolidation share several attributes. First, none of the consolidations involved consolidating the rate centers of different ILECs. Second, all of the states implemented rate center consolidation as a means of conserving telephone numbers. Third, with the exception of Colorado and Iowa, all of the state commissions relied on engagement with interested parties and solicitation of, and reliance on, comments from those parties. Colorado conducted an evidentiary hearing, and Iowa essentially dispensed with any process or engagement and simply reviewed the filing of the ILEC before ordering consolidation.

With regard to specific potential issues raised by commenters in this proceeding, the Commission does not view any of those potential issues as sufficient to overcome the known benefits of rate center consolidation to Maine as a whole. With regard to any revenue impacts to carriers, there are very few telecommunications consumers in Maine who still pay intra-state toll charges. The overwhelming majority of customers are on state-wide or nation-wide calling plans. The relatively *de minimis* impact of the revenue

loss from those few customers who pay interstate toll charges is, in the Commission's view, more than offset by the benefits of consolidation. With regard to the technical implications of consolidation, based on the record of this proceeding and the successful consolidations in other states the Commission does not expect there to be significant technical hurdles or complications for carriers.

In sum, rate center consolidation is not a novel concept and has been used in multiple states for decades to conserve numbering resources. Throughout this proceeding the Commission has engaged with the parties over several months, with a live workshop and multiple rounds of comments. While Maine's consolidation will be larger in scope than in other states, it is the Commission's view that large-scale rate center consolidation is technically feasible, not unduly burdensome on carriers. Further, the public interest is clearly served by large scale rate center consolidation in Maine, with benefits that will inure to all Maine citizens with regard to less confusion when placing calls in Maine and the preservation of Maine's unique "207" identity. Accordingly, the Commission authorizes Consolidated to begin the implementation process for rate center consolidation.

V. ORDERING PARAGRAPH

In light of the foregoing, the Commission

O R D E R S

That Consolidated Communications of Northern New England Company, LLC is authorized to consolidate all of its Maine recenterers into one company-wide rate center.

Dated at Hallowell, Maine this Eleventh Day of October, 2024

/s/ Jody McColman

Hearing Examiner

Michael Johnson
Jason Marco

Commission Staff