

STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

Docket No. 2023-00009

August 11, 2023

MAINE PUBLIC UTILITIES COMMISSION  
Commission Investigation into the Feasibility of Rate  
Center Consolidation Pertaining to Consolidated  
Communications

COMMENTS OF TIME  
WARNER CABLE  
INFORMATION SERVICES  
(MAINE), LLC

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### INTRODUCTION

Charter appreciates the State of Maine’s interest in retaining its single 207 area code and its commitment to pursue strategies to prevent (or at a minimum delay) area code exhaustion. Further, Charter recognizes that rate center consolidation – in the abstract – is a useful mechanism that may serve to advance Maine’s 207 area code policy goals. However, more information is required before Charter can take an informed position on Consolidated Communication’s (hereafter “CCI”) proposal for a near-statewide rate center consolidation, as described in CCI’s July 7, 2023 Comments. Therefore, Charter asks that the Commission issue a detailed scheduling order allowing for formal discovery and one or more workshops, through which service providers and the public can obtain the information necessary to assess the expected benefits and costs associated with CCI’s proposal and develop a detailed plan for implementing that proposal.

### COMMENTS

Charter is familiar with the purpose and practice of rate center consolidation, and it has participated in rate center consolidations within its 41-state network footprint. However, the scale of those efforts has been modest compared to the Maine proposal envisioned by CCI. Based upon Charter’s knowledge and past experience, there has not been a rate center consolidation on the

scale proposed by CCI anywhere in the U.S. As a result, the significant size of this proposed undertaking raises numerous questions:

- What are the goals of this consolidation?
- What are the expected consequences of this consolidation?
- Is this proposal the best way to achieve the State's objectives?
- What are the alternatives?
- What will be required – from all stakeholders – to accomplish this transition?

CCI's existing proposal does not contain the details necessary to effectively answer these important questions. Our understanding is that CCI proposes to consolidate all 136 of the rate centers within the territory of one of its ILEC entities. The rate centers within the territory of its smaller ILEC entity (Consolidated Communications of Maine) will not be consolidated. The objective of this effort would be to allow for more efficient allocation of the telephone numbers available, in order to help prevent the exhaustion of the 207 area code.

As such, this raises additional questions:

- What is the current rate at which available numbers are being assigned?
- If the expected current date of exhaustion is 2025, how long is the State seeking to extend this date?
- How many additional numbers will the proposed rate center consolidation make available?
- How did CCI identify the proposed rate centers for consolidation?
- What is CCI's reasoning for not including in its plan the rate centers located in the territory of Consolidated Communications of Maine?

- If CCI's plan is implemented, when would we expect the 207 area code to be exhausted?
- How will the fiber transitions and sunsetting of traditional time-division multiplexing ("TDM") switches noted in CCI's plan affect the manner and format in which it interconnects with other carriers?
- What are the total costs, to all stakeholders, of implementing CCI's plan?
- What are the costs/benefits associated with alternative rate consolidation strategies? For example, CCI states that the Commission first asked CCI to consider a limited number of rate center consolidations – merging 98 rate centers into 13. What are the costs and benefits of such an approach, as compared with the plan that CCI now advances?

Even if, at this stage, all stakeholders could agree that CCI's proposal presents the best of all possible alternatives, the issue of implementation remains unsettled given that CCI's proposal is vague and lacking in critical details.

As an initial matter, CCI provides a summary of work that will be required by CCI to complete the rate center consolidation, but it does not provide a summary of work that will be required of other carriers. Further, its timeline for implementation is ambiguous and confusing. The actions that CCI describes in its timeline related to the regulatory process; CCI provides the two following dates:

- July 2024 – Plan for rate center consolidation in Maine is approved by the Commission / Commission Staff and is deemed feasible by CCI.
- February 2025 – CCI produces new draft tariffs to share informally with the Commission Staff to review.

What does CCI envision will happen in the seven-month gap between these dates? Is that the time it will take CCI to draft the new tariffs it will share in February 2025?

In contrast, as it relates to January 1, 2026, CCI simply notes that this will serve as the date for “Implementation of Rate Center Consolidation.” This simple statement alone raises many questions that are not addressed in CCI’s filing. What technical changes will be required of the carriers that interconnect with CCI? What will the cost of those changes be? Under what schedule will those changes have to occur?

As we noted above, these open questions make it difficult to take a reasoned position in response to CCI’s proposal. Given that, Charter respectfully suggests that the Commission should initiate the following course of action.

- First, the Commission should provide for a period of formal discovery. During this period, stakeholders should be allowed to propound reasonable interrogatories and document requests for CCI to answer.
- Second, following this discovery period, the Commission should host a workshop where industry stakeholders could make suggestions and raise issues that have not yet been answered.
- Third, following the workshop, CCI should be given the opportunity to revise its proposal to account for feedback from the workshop process.
- Finally, there should be a round of public comments where the public and industry stakeholders provide informed, substantive input in response to CCI’s current proposal.

Charter appreciates the opportunity to submit these comments. We also look forward to working with the Commission, CCI, and other stakeholders to examine this proposal that seeks to preserve Maine's single 207 area code.

Dated: August 11, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Bogan', written over a horizontal line.

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