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Decision 97-06-067 June 11, 1997

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

MCI Telecommunications Corporation (U 5001 C),

Complainant,

vs.

Pacific Bell,

Defendant.

MCI Telecommunications Corporation (U 5001 C),

Complainant,

vs.

Pacific Bell,

Defendant.

**ORIGINAL**

Case 96-03-039  
(Filed March 21, 1996)

Case 96-03-040  
(Filed March 21, 1996)

## TABLE OF CONTENTS

OPINION.....	2
I. Procedural Background.....	2
II. Proposed Modifications to the 530/916 Boundary for Placer and Sutter Counties...	5
A. Position of the Parties.....	10
B. Discussion.....	12
III. The 530/916 Boundary for El Dorado County.....	19
A. Position of the Parties.....	22
B. Discussion.....	22
IV. Customer Education and Notification.....	26
V. Closure of Proceeding.....	27
Findings of Fact.....	28
Conclusions of Law.....	30
ORDER.....	31

## O P I N I O N

This decision grants the petitions to modify Decision (D.) 96-08-042 filed by Pacific Bell (Pacific) and Roseville Telephone Company (RTC). In granting these petitions, this decision modifies the 530 and 916 Numbering Plan Areas (NPAs)<sup>1</sup> by moving the Folsom, Lincoln, Newcastle, and Pleasant Grove exchanges from the 530 NPA to the 916 NPA. This decision also denies the petition to modify D.96-08-042 filed by the County of Placer (Placer)<sup>2</sup> as well as the joint request by the County of El Dorado and the City of Placerville to modify D.96-08-042.

The changes to 530 and 916 NPAs ordered by this decision will not affect the rates charged for any telephone calls. However, the changes to these NPAs will affect when to dial seven versus 11 digits. Therefore, this decision requires telephone corporations to form a committee for the purpose of preparing a plan to educate their customers about the changes to the 530 and 916 NPAs ordered herein. The committee's plan shall be submitted to the Commission's Public Advisor for the Public Advisor's review and approval.

### I. Procedural Background

In D.96-08-042, the Commission ordered the 415 and 916 NPAs to each be split into two smaller NPAs in order to relieve the impending exhaustion of the 415 and 916 area codes. As a result of D.96-08-042, the 415 NPA is to be split on August 2, 1997, into one NPA with the "old" 415 area code, and another NPA with the "new" 650 area code. Similarly, the 916 NPA is to be split on November 1, 1997, into one NPA with the "old" 916 area code and another NPA with the "new" 530 area code.

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<sup>1</sup> An NPA is the geographic area served by an area code.

<sup>2</sup> In this decision, the word "Placer" refers to the county government, while "Placer County" refers to a geographic area. The same convention is used for "El Dorado" and "El Dorado County."

Subsequent to the issuance of D.96-08-042, Pacific, Placer, and RTC each filed a petition to modify D.96-08-042.<sup>3</sup> Pacific filed its petition on October 2, 1996, in which it requested three changes to D.96-08-042. First, Pacific requested that the Folsom, Lincoln, Newcastle, and Pleasant Grove exchanges be moved from the 530 NPA to the 916 NPA. Second, Pacific requested that the City of Dixon in Solano County be moved from the 530 NPA to the 707 NPA. Finally, Pacific asked that the implementation of the 415 NPA split be postponed by one day. Pacific's last two requests were granted by the Commission in D.97-03-049.

RTC filed its petition on October 4, 1996. Like Pacific, RTC's requested that the Lincoln, Newcastle, and Pleasant Grove exchanges be moved from the 530 NPA to the 916 NPA. But unlike Pacific, RTC made no request concerning the Folsom exchange.

Placer filed its petition on November 20, 1996. In its petition, Placer requested that all of Placer County be united within the 530 NPA instead of being divided between the 530 and 916 NPAs.<sup>4</sup>

Responses to one or more of the petitions were filed by Pacific, RTC, GTE California Incorporated (GTE), the Office of Ratepayer Advocates (ORA), and the Area Code Coalition (Coalition).<sup>5</sup> Several hundred letters were also received from the public

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<sup>3</sup> A fourth petition to modify D.96-08-042 was filed by the City of Auburn. Auburn subsequently filed a motion to withdraw its petition which was granted by the assigned Administrative Law Judge in a ruling dated April 14, 1997.

<sup>4</sup> Prior to filing their petitions, Placer and RTC were not parties to the proceeding. Rule 47(e) of the Commission's Rules of Practice and Procedure (Rule) states that "[i]f the petitioner is not a party to the proceeding in which the decision proposed to be modified was issued, the petition must state specifically how the petitioner is affected by the decision and why the petitioner did not participate in the proceeding earlier." RTC and Placer satisfied Rule 47(e) in their petitions and/or the supplements to their petitions filed at the request of Administrative Law Judge Kenney.

<sup>5</sup> The Coalition's members are as follows: AT&T Communications of California, Inc., California Cable Television Association, ICG Access Services, MCI, Metropolitan Fiber Systems, Sprint, and Teleport Communications Group.

regarding Pacific's, Placer's, and RTC's proposals to move the boundary separating the 530 and 916 NPAs (530/916 boundary).

None of the proposed changes to the 530/916 boundary would affect rates charged for telephone calls. However, each proposal would have other consequences affecting thousands of people, businesses, and government entities in El Dorado, Placer, Sacramento, and Sutter Counties. Because of this, assigned Administrative Law Judge (ALJ) Kenney instructed Pacific, in its role as California Code Administrator (CCA),<sup>6</sup> to carry out the following tasks designed to inform the public about the proposed changes to the 530/916 boundary and to solicit the public's input on the proposals:

- Hold public participation meetings in El Dorado, Placer, and Sutter Counties.
- Issue press releases and place newspaper advertisements describing the proposals to move the 530/916 boundary and announcing the time and place for the public participation meetings.
- Hold "local jurisdiction meetings" in El Dorado, Placer, and Sutter Counties with representatives from municipal and county governments.<sup>7</sup>
- Send invitations to attend the local jurisdiction meetings to every supervisor, mayor, council member, and city/county manager in El Dorado, Placer, Sacramento and Sutter Counties.
- File reports with the Commission containing the transcripts of the public participation and local jurisdiction meetings; and containing the results of any poll taken at each meeting.

Parties were allowed to file written comments regarding the CCA's reports and other matters pertaining to the public participation and local jurisdiction meetings.

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<sup>6</sup> The CCA has the responsibility of planning for the establishment of new area codes in California.

<sup>7</sup> All public participation meetings and local jurisdiction meetings were jointly chaired by representatives of the CCA and the Commission's Telecommunications Division (TD). The CCA and TD also held a local jurisdiction meeting in Sacramento County on their own initiative.

At the local jurisdiction meeting in El Dorado County, the County of El Dorado (El Dorado) and the City of Placerville (Placerville) strongly objected to Pacific's proposal to move only part of El Dorado County (i.e., the Folsom exchange) from the 530 to the 916 NPA. El Dorado and Placerville requested instead that the entire county be moved from the 530 NPA to the 916 NPA.

The request by El Dorado and Placerville, if granted, would significantly alter the 530/916 boundary adopted in D.96-08-042. Accordingly, the most appropriate means by which El Dorado and Placerville should have made their request was through a petition to modify D.96-08-042. On the other hand, the purpose of the local jurisdiction meetings was to obtain the input of entities such as El Dorado and Placerville. Since all the parties had an opportunity to address in their comments the request by El Dorado and Placerville to modify D.96-08-042, their request shall be given the same consideration as if it were a formal petition for modification.

The proposed modifications to the 530/916 boundary would primarily affect Sutter, Placer, and El Dorado Counties. In the remainder of this decision, we shall first address proposed modifications to the 530/916 boundary affecting Sutter and Placer Counties. We shall then address proposed modifications to the 530/916 boundary affecting El Dorado County.

## **II. Proposed Modifications to the 530/916 Boundary for Placer and Sutter Counties**

The 530/916 boundary established by D.96-08-042 put all of Sutter County into the new 530 NPA<sup>4</sup> and divided southern Placer County between the 530 and 916 NPAs (see Figure 1). In their petitions, Pacific and RTC both propose (the Pacific/RTC proposal) to move the Lincoln, Newcastle, and Pleasant Grove exchanges from the 530

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<sup>4</sup> D.96-08-042 actually retained in the 916 NPA the small parts of Sutter County served by the North Sacramento 11 and Rio Linda wire centers (see Figure 1). Since the Sutter County geographic area and population served by these two wire centers is de minimis, this decision shall assume that all of Sutter County was placed into the 530 NPA by D.96-08-042.

NPA to the 916 NPA.<sup>9</sup> The Pacific/RTC proposal would include more of southern Placer County in the 916 NPA and divide southeastern Sutter County between the 530 and 916 NPAs (see Figure 2). Since both D.96-08-042 and the Pacific/RTC proposal draw the 530/916 boundary through southern Placer County, these alternatives shall be referred to collectively as the "southern-Placer proposals."

Placer's petition seeks to unite virtually all of Placer County in the 530 area code instead of dividing Placer County between the 530 and 916 area codes as was done in D.96-08-042. Placer's petition would accomplish this objective by drawing the 530/916 boundary along those wire center boundaries that most closely match the Placer-Sacramento county border (see Figure 3).<sup>10</sup> Placer's petition, if adopted, would leave only 250 Placer County phone lines in the 916 NPA.<sup>11</sup> Since Placer's petition draws the 530/916 boundary along the county border, it shall be referred to as the "Placer county-line proposal."

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<sup>9</sup> The Lincoln, Newcastle, and Pleasant Grove exchanges are served by four NXX codes and had a total of 11,199 working lines as of September 9, 1996.

<sup>10</sup> RTC's service territory is about equally divided between Placer and Sacramento Counties. Therefore, Placer's petition, by drawing the 530/916 boundary along the Placer-Sacramento county border, would split RTC's service territory between the two area codes.

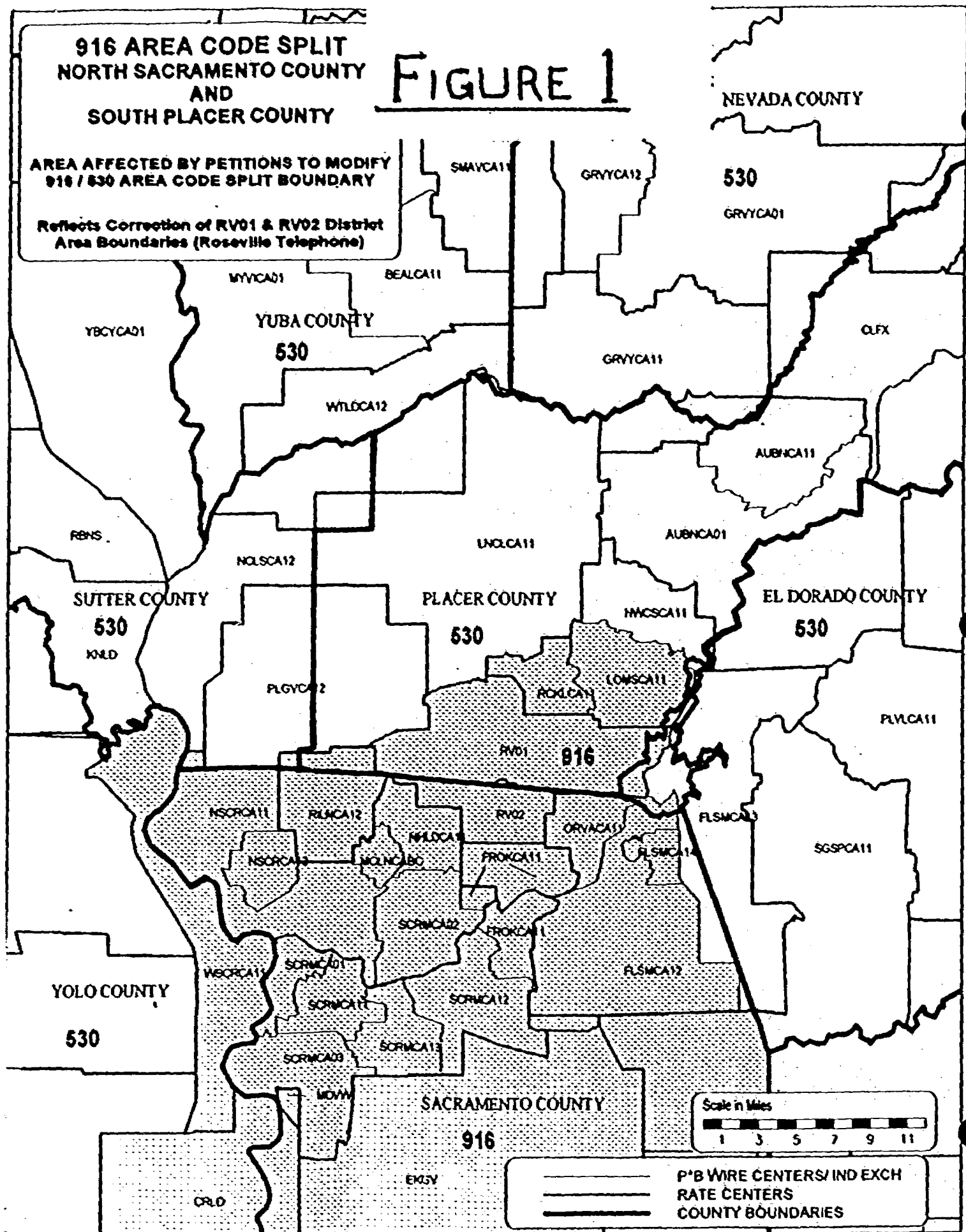
<sup>11</sup> Placer's reply comments filed on March 12, 1997, state that Placer wants to draw the 530/916 boundary so as to precisely match the Placer-Sacramento county border. On the other hand, the transcripts of the Sutter County local jurisdiction meeting held on April 30, 1997, indicate that Placer would be satisfied with drawing the 530/916 boundary along wire center boundaries. This decision shall assume that Placer seeks a 530/916 boundary that matches wire center boundaries.

**916 AREA CODE SPLIT  
NORTH SACRAMENTO COUNTY  
AND  
SOUTH PLACER COUNTY**

# FIGURE 1

**AREA AFFECTED BY PETITIONS TO MODIFY  
916 / 530 AREA CODE SPLIT BOUNDARY**

**Reflects Correction of RV01 & RV02 District  
Area Boundaries (Roseville Telephone)**



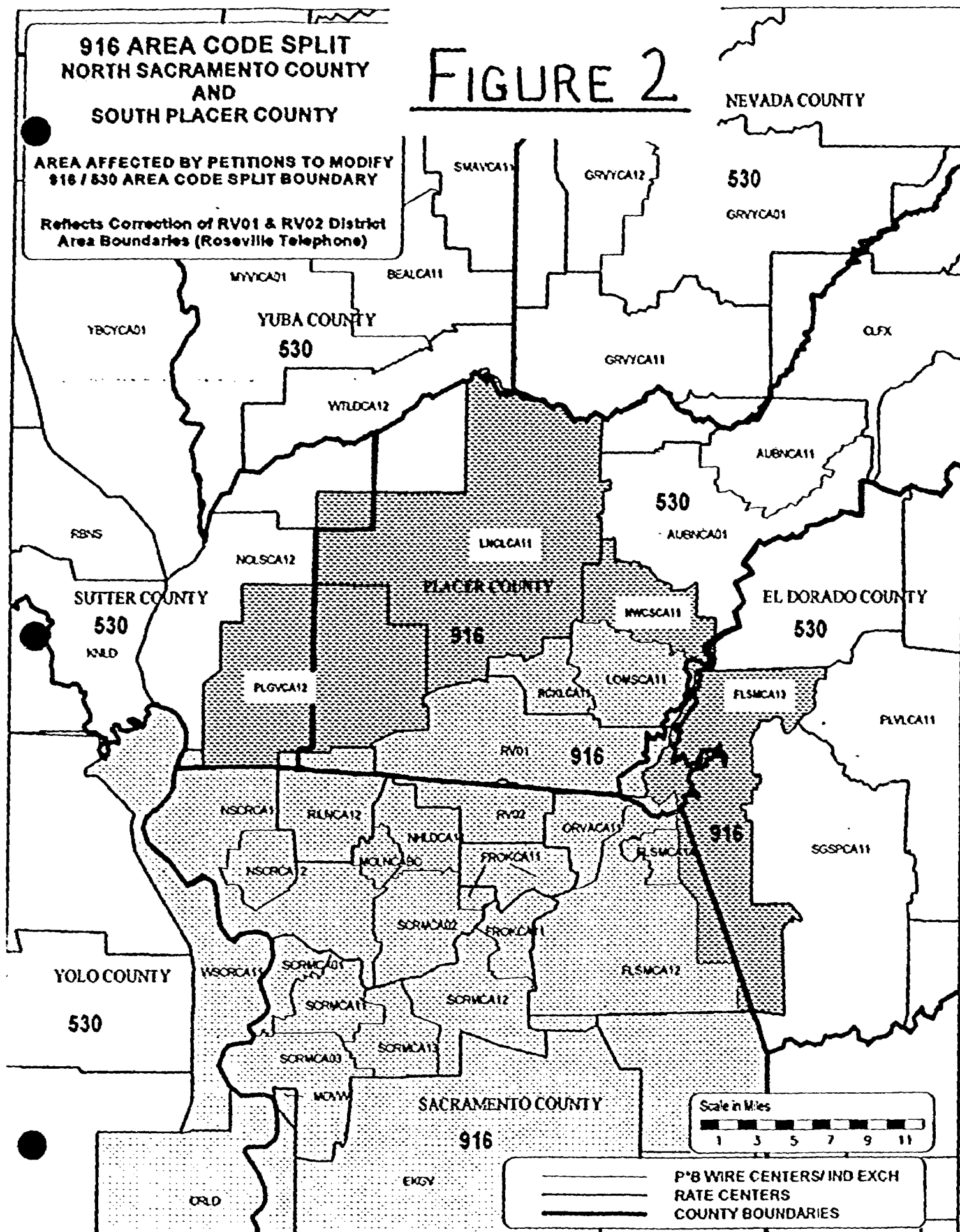


# 916 AREA CODE SPLIT NORTH SACRAMENTO COUNTY AND SOUTH PLACER COUNTY

## FIGURE 2

AREA AFFECTED BY PETITIONS TO MODIFY  
916 / 530 AREA CODE SPLIT BOUNDARY

Reflects Correction of RV01 & RV02 District  
Area Boundaries (Roseville Telephone)

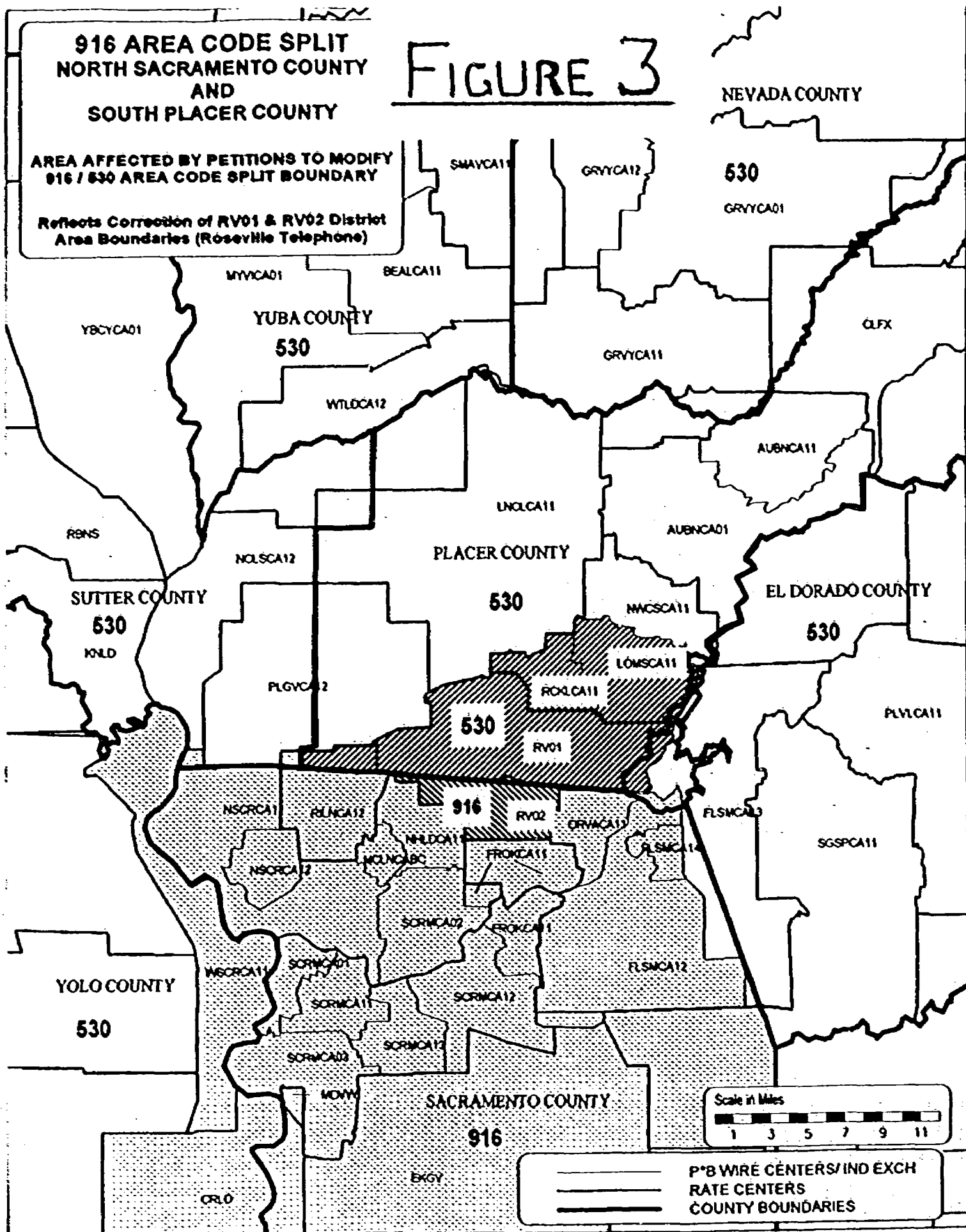


# 916 AREA CODE SPLIT NORTH SACRAMENTO COUNTY AND SOUTH PLACER COUNTY

## FIGURE 3

AREA AFFECTED BY PETITIONS TO MODIFY  
916 / 530 AREA CODE SPLIT BOUNDARY

Reflects Correction of RV01 & RV02 District  
Area Boundaries (Roseville Telephone)



C-96-03-039, C-96-03-020 ALJ/TIM/wav

**A. *Position of the Parties***

In its petition, Pacific presented a variety of facts and arguments to support its request to move the Lincoln, Newcastle, and Pleasant Grove exchanges from the 530 NPA to the 916 NPA. Pacific subsequently changed its position and is now indifferent on whether the Commission adopts the Placer county-line proposal or either of the southern-Placer proposals.

RTC supports the Pacific/RTC proposal. According to RTC, adoption of the Pacific/RTC proposal is warranted by the calling patterns of telephone subscribers in southern Placer County. In particular, since most of the toll calls originating in Roseville terminate in Sacramento, RTC believes that subscribers in southern Placer County should be in the same 916 area code as Sacramento County in order to minimize 11-digit dialing.

RTC does not believe the Pacific/RTC proposal will harm or perplex Placer County residents even though the proposal divides the county between two NPAs. RTC notes that under the Pacific/RTC proposal, residents in southern Placer County may still reach vital county services through existing 800/888 toll-free numbers and/or through seven-digit dialing since many Placer County agencies have numbers with south Placer County prefixes. In addition, many people in southern Placer County rely on city services instead of county services, further minimizing the adverse impact of splitting Placer County between two area codes. RTC adds that customer education requirements imposed by the Commission will alleviate any confusion that might occur. RTC also observes that many other California counties are able to successfully provide services under a multi-area code environment.

Placer strongly opposes splitting Placer County between two area codes. Placer states that it has successfully built an identity distinct from neighboring Sacramento County as part of an overall strategy to attract major employers and large retail operations to Placer County. Placer is concerned that maintaining southern Placer County in the 916 area code will undermine these efforts and lead to Roseville and nearby communities once again being identified with Sacramento.

Placer states that the entire county needs to be in the 530 NPA in order for it to effectively meet the needs of its residents for vital services. According to Placer, virtually all services provided by the county require telephone contact between the service recipients and the county's central offices in Auburn. Placer is worried that splitting the county between two area codes will cause confusion leading to delays in providing crucial services.

GTE recommends that the Commission adopt the Pacific/RTC proposal since it garnered the most support at the public participation meetings. Additionally, GTE believes that the volume of toll calls from Roseville to Sacramento demonstrates a strong community of interest between these two area, and that the Pacific/RTC proposal maintains this community of interest.

ORA recommends that the Commission select either the Pacific/RTC proposal or the Placer county-line proposal since the former received the most support at the public participation meetings while the later is supported by a majority of affected governmental entities.

The Coalition supports the Placer county-line proposal since it would extend the life of the new 916 NPA and thereby obviate the need for "extreme [NXX code] rationing measures" currently faced in other NPAs. The Coalition also believes that Placer has made a compelling case concerning its county-wide interests.

Almost all the local jurisdictions in Placer County support the Placer county-line proposal, including: the Cities of Auburn, Colfax, Lincoln, Loomis, and Rocklin; the Newcastle/Ophir Municipal Advisory Council; and the Penryn Area Advisory Council.<sup>12</sup> The Placer county-line proposal is also supported by the County of Sutter, Yuba City in Sutter County, the City of Sacramento, the League of Placer County

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<sup>12</sup> Members of the Newcastle/Ophir Municipal Advisory Council and the Penryn Area Advisory Council are appointed by the Placer County Board of Supervisors to represent the interests of the citizens in these areas.

Taxpayers, the Placer County Office of Education, and the Roseville Press-Tribune newspaper.

The Pacific/RTC proposal is supported by the City of Roseville in Placer County, the City of Citrus Heights in Sacramento County, and Assemblywoman Alby (who represents the City of Citrus Heights and surrounding areas). Most of the letters received by the Commission support the Pacific/RTC proposal, including letters from Hewlett-Packard Company, NEC Electronics Inc., the Citrus Heights Water District, and the Chambers of Commerce for Roseville, Citrus Heights, and Granite Bay. In addition, members of the public casting ballots at public participation meetings favored the Pacific/RTC proposal over D.96-08-042 and the Placer county-line proposal by a significant margin.

**B. Discussion**

To evaluate each proposal for the 530/916 boundary, we shall rely on the following six criteria used in prior decisions to assess proposed area code boundaries<sup>13</sup>:

1. Minimization of adverse impacts to subscribers in the exhausting NPA.
2. Optimization of the lives of the old and new NPAs.
3. Compliance with statutory requirements.
4. Ability to be implemented prior to the projected exhaust date of the NPA.
5. Balanced impact on members of the telecommunications industry.
6. Equitable impact on all existing and potential NXX code holders.<sup>14</sup>

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<sup>13</sup> D.97-03-049, D.96-11-061, D.96-08-042, and D.95-10-043.

<sup>14</sup> NXX codes are the first three digits of a telephone customer's seven-digit telephone number. Local exchange carriers (LECs), competitive local carriers (CLCs), and wireless carriers may obtain "blocks" of NXX codes (i.e., blocks of 10,000 phone numbers) which they then assign to their own customers.

No party asserted that either the Placer county-line proposal or the southern-Placer proposals is inferior or superior in terms of meeting Criteria 4, 5 and 6. Consequently, we find that Criteria 4, 5 and 6 are neutral factors in weighing the merits of each proposal.

Criterion 1 considers which proposal minimizes adverse impacts to subscribers in the exhausting NPA. Adverse impacts include the cost, disruption, and confusion caused by a new area code. Such costs include the need to change stationary, businesses cards, advertising copy, and databases that include phone numbers. Disruption includes the time and effort needed to inform friends, relatives, and business contacts about the change in one's area code. Confusion caused by a change to a new area code includes subscribers' unfamiliarity with the geographic location of numbers being called relative to the new NPA boundary, resulting in bafflement about when to dial seven digits or 11 digits.

The adverse impacts of cost and disruption can be minimized by drawing an area code boundary which causes the fewest subscribers to change their area code. Of the three alternatives, the Pacific/RTC proposal results in fewest subscribers having to change their area code, and, therefore, minimizes the adverse impacts of cost and disruption.

The adverse impact of subscriber confusion can be reduced by drawing an area code boundary that reduces 11-digit dialing and thereby minimizes subscribers' need to know (and confusion about) when to dial seven versus 11 digits. Confusion can also be reduced by drawing an area code boundary that follows well-known geographical boundaries such as city and county borders. Of the three alternatives, RTC demonstrated that the Pacific/RTC proposal and D.96-08-042 are equal to each other and better than the Placer county-line proposal at minimizing 11-digit dialing.<sup>13</sup> On the

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<sup>13</sup> RTC demonstrated that 11-digit dialing for subscribers in the Roseville-Main exchange (which is in the 916 NPA under both D.96-08-042 and the Pacific/RTC proposal) could be minimized by keeping this exchange in the 916 NPA.

other hand, of the three alternatives, only the Placer county-line proposal reduces subscriber confusion by drawing the 530/916 boundary to follow well-known geographical boundaries (i.e., the Placer-Sacramento county border).

We conclude that under the circumstances of this proceeding the adverse impact of subscriber confusion will be reduced more by minimizing 11-digit dialing for tens-of-thousands of subscribers" (i.e., the Pacific/RTC proposal and D.96-08-042) than by an area code boundary whose location is better understood (i.e., the Placer county-line proposal) but also requires a substantially higher level of 11-digit dialing. In sum, of three alternatives the Pacific/RTC proposal is best at satisfying Criterion 1 since it is the only alternative that minimizes each of the adverse impacts of costs, disruption, and confusion.

Criterion 2 considers which proposal optimizes the life of the old and new area codes. In the case of a geographic split, this criterion is a balance of four subparts. First, each of the area codes that results from an NPA split should have a life of at least five years. Second, the life of the new area code should be longer than the life of the old area code. This is because the subscribers in the new area code have had to experience the adverse impacts of receiving the new area code and should be relieved of having to undergo the experience again for as long as feasible. Third, there should not be too great of a disparity between the lives of the old and new area codes. For example, the life of the new area code should generally be no more than twice the life of the old area code. Finally, there should be a reasonable basis for any departure from the first three subparts of Criterion 2. For example, reducing the life of one area code to less than five years should be offset by a substantial increase in the life of the other area code.

The lives for the old and new area codes under each of the proposals are shown in Table 1 below:

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" The CCA indicates there are 16 NXX codes (160,000 telephone numbers) in the Roseville-Main exchange. Although the CCA does not indicate the total telephone numbers in use for these NXX codes, the aggregate amount is in the tens-of-thousands, if not hundreds-of-thousands.

**Table 1**

	Life in years of 530 NPA	Life in years of 916 NPA
D.96-08-042:	14½ - 16½	7½ - 8
Pacific/RTC Proposal:	14½ - 16½	7½ - 8
Placer County- Line Proposal:	12½ - 14	8½ - 9½

As shown in Table 1, each proposal satisfies Criterion 2. More specifically, under each proposal the 530 and 916 area codes each have lives of at least five years; the life of the new 530 area code is longer than the life of the old 916 area code; and the life of the new area code is no more than twice the life of the old area code. Since all three proposals satisfy Criterion 2, we find that Criterion 2 is a neutral factor in weighing the merits of the three alternatives.

Criterion 3 concerns whether a new area code boundary meets statutory requirements. In prior decisions,<sup>17</sup> we stated that the relevant statutes for this criterion are Public Utilities (PU) Code Section 2887(a) and Elections Code Section 21601 which state as follows:

**PU Code 2887(a):** "Whenever a telephone corporation initially establishes the boundaries for a new area code, the boundaries shall coincide with the boundaries of a city, or if the area code is to include less than the entire area of a city, the corporation shall consider, among other things, the criteria set forth in Section 21601 of the Elections Code in determining those boundaries."

**Elections Code 21601:** "In establishing the boundaries of the districts the council may give consideration to the following factors: (a) topography, (b) geography, (c) cohesiveness, contiguity,

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<sup>17</sup> D.96-11-042 and D.96-08-042.



integrity, and compactness of territory, and (d) community of interests of the districts."

PU Code 2887(a) does not literally apply since the statute is concerned with the boundaries of cities (and not counties) relative to the area code boundary. However, consistent with D.96-08-042 and D.96-11-061, we find that considering the public policy preferences expressed in PU Code 2887(a) and Election Code Section 21601, while not mandated in this specific instance, is helpful in evaluating which area code alternative to choose.

No party asserts that one proposal is better than the others in terms of satisfying "factors" (a) - (c) of Elections Code 21601. Therefore, we find that the Placer county-line proposal and the southern-Placer proposals equally satisfy factors (a) - (c).

There was, however, much dispute among the parties about which proposal best satisfies factor (d) regarding "community of interest." We believe that communities of interest are best maintained by an area code boundary that accomplishes as many of the following objectives as possible: (1) Keeps individual cities and counties entirely within one area code; (2) Reflects subscribers' calling patterns by minimizing 11-digit dialing; (3) Reflects the expressed preferences of the public; and (4) Reflects the preferences of local jurisdictions.

The first objective is to keep every city and county in one area code if possible. None of the proposals divides any city between two area codes. However, D.96-08-042 splits Placer County into two area codes, and the Pacific/RTC proposal would split both Placer and Sutter Counties into two area codes.<sup>15</sup> On the other hand, the Placer county-line proposal, with the exception of 250 phone lines, would not split any county between two area codes. Therefore, the Placer county-line proposal better fulfills the first objective than do the southern-Placer proposals.

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<sup>15</sup> The Pacific/RTC proposal would place 457 phone lines in southeastern Sutter County into the 916 area code while the remainder of Sutter County would be in the 530 area code.

The second objective in maintaining communities of interest is to reflect subscribers' calling patterns. The only data on calling patterns came from RTC who demonstrated that customers in the Roseville-Main exchange place far more toll calls to Sacramento (in the 916 NPA) than to areas in the new 530 NPA. This information indicates that subscribers in the Roseville exchange would, based on their calling patterns, prefer to be placed in the 916 NPA in order to maintain seven-digit dialing to areas they call the most.<sup>19</sup> No such inference can be drawn about the preferences of other subscribers in southern Placer County since no data was provided on the calling patterns of subscribers in other exchanges. Since the Roseville-Main exchange would stay in the 916 NPA under both of the southern Placer proposals, the available data indicates that these two alternatives better fulfill the second objective than does the Placer county-line proposal.

The third objective in maintaining communities of interest is to draw an area code boundary that reflects the expressed preferences of the public. This objective is best met by Pacific/RTC proposal since it was favored by a majority of people who wrote letters to the Commission and/or attended the public participation meetings.

The final objective in maintaining communities of interest is to draw an area code boundary that reflects the preferences of the affected local jurisdictions (i.e., towns, cities, and counties). The Placer county-line proposal is favored by Placer and Sutter Counties, the City of Sacramento, Yuba City, and all municipalities in Placer County except for Roseville. The Pacific/RTC proposal, on the other hand, is supported by Roseville and the City of Citrus Heights in Sacramento County.

To help us better weigh the preferences expressed by the local jurisdictions, we shall take official notice of the *1995 California Statistical Abstract*.<sup>20</sup> This

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<sup>19</sup> We recently stated that "customers still place a high value on retaining seven-digit dialing as long as possible." (D.96-12-086, mimeo, p.34.)

<sup>20</sup> This document is published by the California Department of Finance and contains data on the population of California's cities and counties as of January 1, 1995.

document shows that as of January 1, 1995, Placer had a total population of 210,000, of which 59,400 resided in the City of Roseville. This data indicates that the elected representatives of 29.3% of the population of Placer County (i.e., Roseville) favor the Pacific/RTC proposal, while the elected representatives of at least 71.7% of the population of Placer County favor the Placer county-line proposal.<sup>21</sup> The data in the *1995 California Statistical Abstract* also shows that the support for the Pacific/RTC proposal by the City of Citrus Heights (in Sacramento County) with a population of 90,000<sup>22</sup> is offset by the support given to the Placer county-line proposal by the City of Sacramento with a population of 396,000 and by Sutter County with a population of 74,900.

In sum, the Pacific/RTC proposal and the Placer county-line proposal each satisfy two of the four objectives associated with maintaining communities of interest, while D.96-08-042 only satisfies one objective. On balance, we find that the two objectives favoring the Pacific/RTC proposal should be given more weight than the two objectives favoring the Placer county-line proposal. In making this finding, we recognize that splitting Placer County between two area codes is not conducive to maintaining communities of interest based upon political and geographic boundaries. Nonetheless, many counties, out of necessity, have been split between two area codes, some for many years. The experience of these counties has shown that counties can adjust to being split between two area codes without undue hardships. Therefore, the objective of not splitting a county should, in this instance, be accorded reduced weight compared to the other objectives associated with maintaining communities of interest. We also considered the preferences expressed by local jurisdictions, most of whom support the Placer county-line proposal. But we believe the preferences of local jurisdictions is outweighed in this case by two countervailing factors. First, the calling

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<sup>21</sup> The Board of Supervisors of Placer County represent 100% of the population.

<sup>22</sup> Information on the population of the City of Citrus Heights comes from a letter to the Commission from the Mayor of Citrus Heights.

patterns of subscribers in southern Placer County is a compelling indication that most of these subscribers have a stronger community of interest with Sacramento than with other parts of Placer County and, therefore, would prefer the Pacific/RTC proposal. Second, the Pacific/RTC proposal was favored by a large majority of those who attended the public participation meetings and wrote letters to the Commission. This indicates that the local jurisdictions' support for the Placer county-line proposal does not reflect the preference of many, if not most, of the affected businesses and residents.

We conclude that the Pacific/RTC proposal should be adopted since it better meets Criteria 1 and 3, while Criteria 2, 4, 5, and 6 are neutral factors in weighing the merits of each proposal. Accordingly, we shall adopt the Pacific/RTC proposal to modify D.96-08-042 and move the Lincoln, Newcastle, and Pleasant Grove exchanges from the 530 NPA to the 916 NPA.

### **III. The 530/916 Boundary for El Dorado County**

The 530/916 boundary adopted by D.96-08-042 placed into the new 530 NPA all of El Dorado County, a sliver of eastern Sacramento County served by the Folsom exchange, and the portions of Alpine and Mono Counties currently served by the 916 area code (see Figure 1, *supra*, and Figure 4). In its petition, Pacific proposes to move the Folsom exchange from the 530 NPA to the 916 NPA. If adopted, Pacific's petition would have the following effects: (1) redrawing the 530/916 boundary to run through western El Dorado County; (2) moving the community of El Dorado Hills (EDH) in El Dorado County from the 530 NPA to the 916 NPA; (3) dividing El Dorado County between the 530 and 916 NPAs; and (4) uniting all of Sacramento County in the 916 NPA (see Figure 2, *supra*).

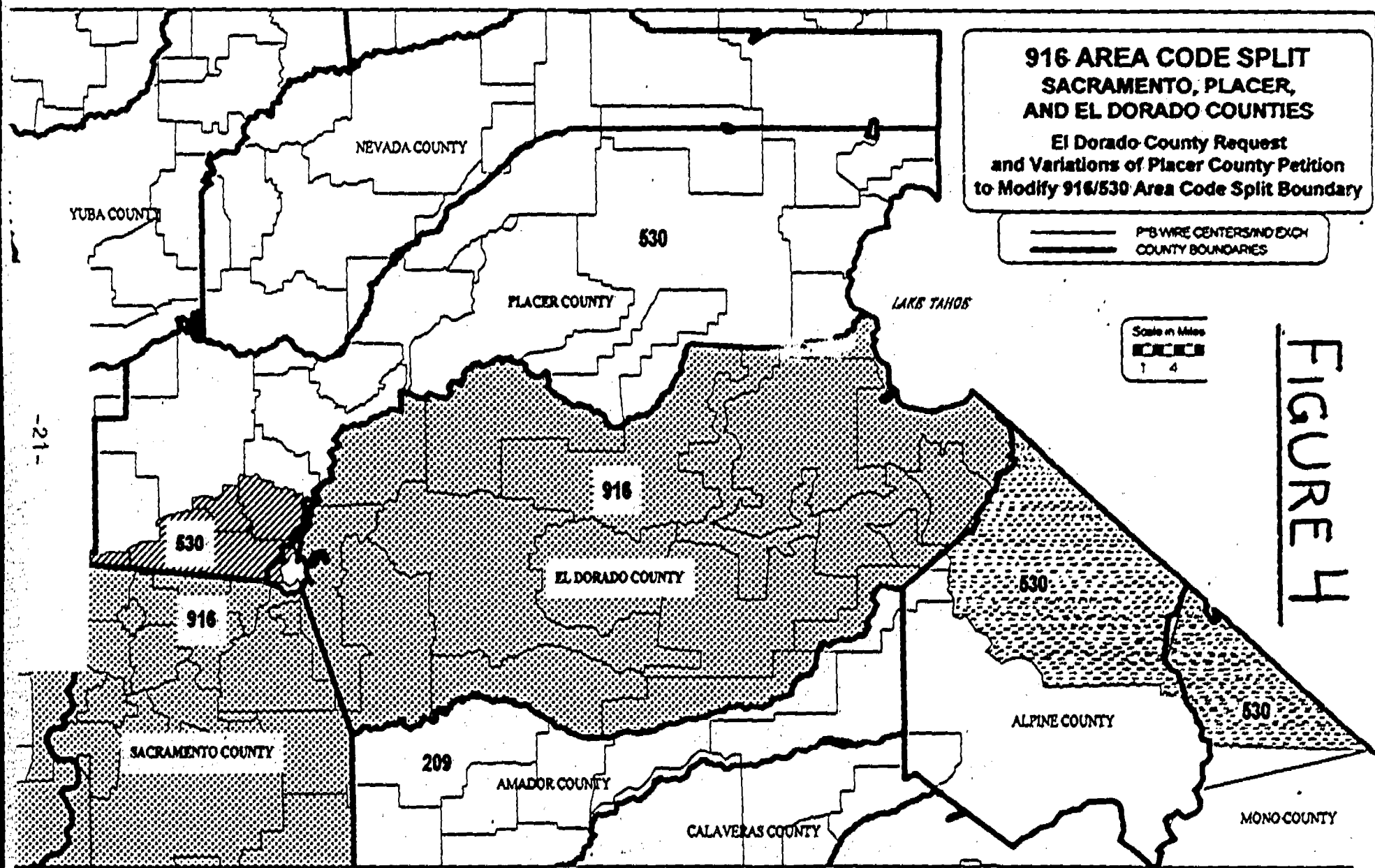
El Dorado and Placerville request that all of El Dorado County be moved from the 530 NPA to the 916 NPA (the El Dorado 916 proposal). If adopted, the El Dorado 916 proposal would move the 530/916 boundary to the El Dorado-Placer county border

(see Figure 4).<sup>23</sup> The El Dorado 916 proposal would also require the realignment of wire center boundaries in order to draw the 530/916 boundary along the El Dorado-Placer county border. In general, the Commission does not require area code boundaries to precisely match political boundaries due to the expense and complexity of realigning wire center boundaries. Accordingly, the El Dorado 916 proposal shall only be considered to the extent that it can be accomplished by using the existing wire center boundaries that most closely follow the El Dorado-Placer county border.<sup>24</sup> The El Dorado 916 proposal so modified would result in parts of El Dorado County being in the 530 NPA; but most of El Dorado County, including its largest population centers (i.e., EDH, Placerville, and South Lake Tahoe), would be in the 916 NPA.

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<sup>23</sup> The El Dorado 916 proposal would also create 530 NPA "islands" in Alpine and Mono Counties unconnected with the great bulk of the 530 NPA located to the north of El Dorado County.

<sup>24</sup> Wire centers that serve both El Dorado and Placer Counties should be included in the 530 NPA.



Provided by California Code Administration

Moves all of Placer County and part of Roseville Telephone to 530;  
Keeps all of El Dorado County and part of Roseville Telephone in 916

ARM/WIL/PTV 070-EO-96°C 660-EO-96°C

**A. *Position of the Parties***

Pacific recommends that the Commission adopt its petition since the residents of EDH and the El Dorado Hills Chamber of Commerce strongly support this alternative. On the other hand, Pacific finds merit in keeping all of El Dorado County in one area code, as long as it is the 530 area code. Accordingly, Pacific does not oppose the Commission retaining the 530/916 boundary established in D.96-08-042 which placed all of El Dorado County into the 530 NPA.

GTE, ORA, and RTC support Pacific's petition to place EDH in the 916 NPA. ORA opposes the El Dorado 916 proposal while GTE does not.

The Commission received hundreds of letters regarding Pacific's petition, most of which support Pacific's request to move EDH from the 530 NPA to and 916 NPA. In addition, members of the public casting ballots at the public participation meeting in EDH overwhelmingly supported Pacific's petition.<sup>25</sup> Pacific's petition was also supported by the El Dorado Hills Community Service District (EDHCSD).<sup>26</sup> On the other hand, El Dorado and Placerville strongly oppose Pacific's petition and support keeping all of El Dorado County in one area code, with their first choice being the 916 area code followed by the 530 area code. Also opposing Pacific's petition were the Placerville Merchants Association and the Placer Mountain Democrat newspaper.

**B. *Discussion***

To assess the merits of each of the three alternatives for the 530/916 boundary relative to El Dorado County, we shall use the following six criteria identified previously in this decision:

1. Minimization of adverse impacts to subscribers in the exhausting NPA.

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<sup>25</sup> The public was not asked at the public participation meeting about their preference for keeping all of El Dorado County in the 916 area code.

<sup>26</sup> The record is not clear regarding the authority and responsibility of EDHCSD. However, since the EDHCSD appears to have its members elected by the public, we shall treat the EDHCSD as a "local jurisdiction."

2. Optimization of the lives of the old and new NPAs.
3. Compliance with statutory requirements.
4. Ability to be implemented prior to the projected exhaust date of the NPA.
5. Balanced impact on members of the telecommunications industry.
6. Equitable impact on all existing and potential NXX code holders.

No party claimed that any of the three alternatives for drawing the 530/916 boundary relative to El Dorado County is better or worse in terms of meeting Criteria 4, 5 and 6. Consequently, we find these criteria to be neutral factors in weighing the merits of the three alternatives.

Criterion 1 considers which alternative minimizes the adverse impacts of cost, disruption, and confusion. As stated previously, cost and disruption can be minimized by drawing an area code boundary that causes the fewest subscribers to change their area code. Of the three alternatives, the El Dorado 916 is best at minimizing cost and disruption since it causes the fewest subscribers to change their area code, Pacific's petition is second best, and D.96-08-042 is last.

Also stated previously was that the adverse impact of subscriber confusion can be reduced by drawing an area code boundary that minimizes 11-digit dialing and thereby reduces subscribers' need to know (and confusion about) when to dial seven versus 11 digits. Subscriber confusion can also be reduced by drawing an area code boundary that follows well-known geographical boundaries such as city and county borders. Of the three alternatives, none follows well-known boundaries such as city and county borders. Consequently, this cannot be used as a basis for deciding which alternative minimizes customer confusion. In addition, the record contains no hard data regarding which alternative reduces 11-digit dialing for subscribers in El Dorado County. However, the input from the public participation meeting in EDH and the hundreds of letters received by the Commission indicate that subscribers in El Dorado County place more calls to Sacramento County in the 916 NPA than to areas in the new 530 NPA. This information suggests that relative to D.96-08-042, the El Dorado



916 proposal and Pacific's petition would reduce 11-digit dialing and thus minimize customer confusion.

In sum, we find that the El Dorado 916 proposal is best at satisfying Criterion 1 since it minimizes the adverse impacts of cost, disruption, and customer confusion. Pacific's petition is second best at meeting Criterion 1, while D.96-08-042 is last.

Criterion 2 considers which proposal optimizes the life of the old and new NPAs. The lives of the 530 and 916 NPAs under each of the alternatives are as follows:

**Table 2**

	Life in Years of the 530 NPA	Life in Years of the 916 NPA
D.96-08-042	14½ - 16½	7½ - 8
Pacific/RTC Proposal (adopted earlier in this decision)	14½ - 16½	7½ - 8
Pacific/RTC Proposal + Pacific's Petition re: EDH	15 - 17	7 - 8
Pacific/RTC Proposal + El Dorado 916 Proposal <sup>12</sup>	16 - 18½	6½ - 7

As stated earlier, Criterion 2 is a balance of four subparts. First, each of the area codes resulting from a split should have a life of at least five years. Second, the life of the new area code should be longer than the life of the old area code. Third, the life of the new area code should be no more than twice the life of the old area code. Finally, any departure from the first three criteria should have a reasonable basis.

<sup>12</sup> The CCA did not provide an estimate of the lives of the 530 and 916 NPAs under the scenario of the Pacific/RTC proposal plus the El Dorado Hills proposal. However, the lives of the 530 and 916 NPAs under this scenario can be readily deduced from the data provided by the CCA.

Each alternative results in lives for the 530 and 916 area codes that are at least five years. Each alternative also produces a life for the new 530 area code that is longer than the life of the old 916 area code. However, only D.96-08-042 and Pacific's petition result in a life for the new 530 area code that is, on an approximate basis, no more than twice as long as the life of the old 916 area code. The El Dorado 916 proposal fails this test since it results in a life for the new 530 area code that is clearly more than twice as long as the life of the old 916 area code. No party presented a reason for adopting a plan for the 530 and 916 area codes that would result in lives for these area codes being so unbalanced, and we likewise can find no reason for doing so. Accordingly, we shall exclude the El Dorado 916 proposal from further consideration in the remainder of this decision.

In applying Criterion 3, we, like the participants in this proceeding, shall focus on which of the two remaining alternative best maintains communities of interest. Previously in this decision, we stated that communities of interest are best maintained by an area code boundary that accomplishes as many of the following objectives as possible: (1) Keeps individual cities and counties within one area code; (2) Reflects subscribers' calling patterns by minimizing 11-digit dialing; (3) Reflects the expressed preferences of the public; and (4) Reflects the expressed preferences of local jurisdictions.

Neither D.96-08-042 nor Pacific's petition is clearly superior at meeting Objective 1 since the former divides Sacramento County between two area codes while the latter divides El Dorado County between two area codes.<sup>28</sup>

The record contains no hard data regarding Objective 2 which concerns the minimization of 11-digit dialing. However, the input from the public participation

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<sup>28</sup> Neither D.96-08-042 nor Pacific's petition divides any city between area codes, and both alternatives divide Alpine and Mono Counties between two area codes. The two alternatives could be ranked in terms of Objective 1 by determining which alternative keeps the greatest number of county residents in the same NPA. However, there is insufficient information in the record to make this determination.

meeting in EDH and the hundreds of letters received by the Commission indicates that subscribers in EDH place more calls to Sacramento County in the 916 NPA than to areas in the new 530 NPA. This information suggests that Pacific's petition would reduce 11-digit dialing relative to D.96-08-042 and thus better satisfy Objective 2.

Objective 3 seeks to maintain communities of interest by drawing an area code boundary that reflects the expressed preferences of the public. This objective is better met by Pacific's petition which received overwhelming support at the public participation meeting in EDH and in the hundreds of letters received by the Commission.

Objective 4 seeks to maintain communities of interest by drawing an area code boundary that reflects the expressed preferences of local jurisdictions. This objective is better satisfied by D.96-08-042 due to the support this proposal received from El Dorado and Placerville<sup>29</sup> which outweighs the support given to Pacific's petition by EDHCSD.

On balance, we find that Criterion 3 is better satisfied by the Pacific's petition due to its superiority in fulfilling two objectives (i.e., Objectives 2 and 3) which outweigh D.96-08-042's superiority in fulfilling only one objective (i.e., Objective 4). In sum, we find that Pacific's petition is better than D.96-08-042 at meeting Criteria 1 and 3, while Criteria 2, 4, 5, and 6 are neutral factors in weighing the merits of the two alternatives. We shall, therefore, modify D.96-08-042 to place the community of El Dorado Hills (i.e., the Folsom exchange) in the 916 NPA.

#### **IV. Customer Education and Notification**

In previous decisions issued in this proceeding, we ordered LECs, CLCs, and wireless carriers (referred to collectively as telephone corporations) to notify and educate their customers about the changes to their area code required by those decisions (D.96-08-042 and D.97-03-049). We believe that customers must likewise be

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<sup>29</sup> D.96-08-042 meets El Dorado and Placervilles' goal of keeping El Dorado County in one area code.

notified and educated about the changes to the 530 and 916 area codes that we order in this decision. Accordingly, we shall require telephone corporations to form a committee, chaired by the CCA, for the purpose of collectively preparing a comprehensive plan to notify and educate customers about the changes to area codes ordered herein. The committee should submit its plan to the Commission's Public Advisor (PA) no later than 30 days following the date of this decision.<sup>x</sup> The PA shall then review and approve of the plan, and may require telephone corporations to make changes to the plan. Each telephone corporation shall bear the cost to notify and educate its own customers about the actions we take in this decision.

The sooner customers are notified and educated about the change to their area code ordered herein, the better they will be able to prepare for the change. By being better prepared, it may be possible for customers to reduce the costs, disruption, and confusion caused by a change to their area code. Therefore, in order to facilitate telephone corporations providing notice and education to their customers as soon as possible, we shall make this decision effective immediately.

#### **V. Closure of Proceeding**

In D.96-08-042 we left open this proceeding in order to (1) resolve any disputes that may arise during the implementation of the geographic splits of the 415 and 916 NPAs, and (2) to take additional action, if necessary, to avert premature number exhaustion.

We no longer discern a need to hold open this proceeding in order to resolve possible future disputes over the implementation of the 415 and/or 916 splits. If there is such a dispute, parties should use our established dispute resolution procedures such as the filing of a complaint or a petition to modify the appropriate decision issued in this proceeding. Nor do we see a need to hold open this proceeding in order to take action that might be required to avoid premature number exhaustion. If such action is

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<sup>x</sup> The CCA should provide a copy of the proposed plan to any party who requests a copy.

necessary, then a party may file a petition to modify the appropriate decision in this proceeding or in Rulemaking (R.) 95-04-043/Investigation (I.) 95-04-044.<sup>31</sup>

#### **Findings of Fact**

1. D.96-08-042 adopted a plan to geographically split the 916 NPA on November 1, 1997.

2. The geographic split of the 916 NPA will result in one NPA with the "old" 916 area code and another NPA with the "new" 530 area code.

3. With very minor exceptions, D.96-08-042 put all of El Dorado and Sutter Counties into the new 530 NPA. In addition, D.96-08-042 split Placer and Sacramento Counties between the 530 and 916 NPAs.

4. Pacific filed a petition to modify D.96-08-042 on October 2, 1996. Pacific's petition requested, among other things, to move the Lincoln, Newcastle, Pleasant Grove, and Folsom exchanges from the 530 NPA to the 916 NPA. The other requests contained in Pacific's petition were addressed in D.97-03-049.

5. RTC filed a petition to modify D.96-08-042 on October 4, 1996. RTC's petition requested the Lincoln, Newcastle, and Pleasant Grove exchanges be moved from the 530 NPA to the 916 NPA.

6. Pacific's and RTC's petitions to modify D.96-08-042 would, if granted, divide El Dorado and Sutter Counties between the 530 and 916 NPAs.

7. Placer filed a petition to modify D.96-08-042 on November 20, 1996. Placer's petition requested that virtually all of Placer County be included in the 530 NPA by having the 530/916 boundary generally follow the Placer-Sacramento county border.

8. None of the petitions to modify D.96-08-042 would affect the rates charged to place a telephone call.

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<sup>31</sup> See, for example, D.96-11-010, which granted a petition to modify D.96-09-087 issued in R.95-04-043/I.95-04-044 so as to facilitate the possible acceleration of the split of the 619 NPA in order to avert premature number exhaustion.

9. To inform the public about the various proposals to modify the 530/916 boundary, and to solicit public input on each of the proposals, Pacific, in its role as CCA, issued press releases, placed advertisements in local newspapers, and held public participation meetings in Auburn, El Dorado Hills, Pleasant Grove, and Roseville.

10. To inform local jurisdictions about the various proposals to modify the 530/916 boundary, and to solicit the input of local jurisdictions on these proposals, Pacific, in its role as CCA, undertook the following actions: (a) Sent letters to every city and county manager in El Dorado, Placer, Sacramento, and Sutter Counties; (b) Sent letters to each member of every county board of supervisors and municipal council in El Dorado, Placer, Sacramento, and Sutter Counties; and (c) Invited all county supervisors and municipal council members in El Dorado, Placer, Sacramento, and Sutter Counties to attend meetings in Auburn, Placerville, Yuba City, Roseville, and Sacramento.

11. At the local jurisdiction meeting in Placerville, El Dorado and Placerville asked that D.96-08-042 be modified so as to keep all of El Dorado County in the 916 area code.

12. Portions of Alpine and Mono Counties are currently in the 916 NPA but will be placed in the 530 NPA as a result of D.96-08-042.

13. The El Dorado 916 proposal, if adopted, would require that wire center boundaries be realigned in order to match the 530/916 boundary with the El Dorado-Placer county border.

14. The Commission does not require area code boundaries to match political boundaries due to the cost and complexity involved in the attendant realignment of wire center boundaries.

15. Decisions 95-10-043, 96-08-042, 96-11-061, and 97-03-049 used the following criteria to evaluate proposals to establish area code boundaries:

- a. Minimize the impact to existing customers in the exhausting NPA.
- b. Optimize the life of the old and new NPAs.
- c. Meet statutory requirements.
- d. Meet the projected exhaustion date of the old NPA.

- e. Balance the impact to the telecommunications industry.
- f. Have an equitable impact on all existing and potential NXX code holders.

18. Public Utilities Code 2887 states that boundaries for a new area code shall coincide with the boundaries of a city, or if the area code is to include less than the entire area of a city, the telephone corporation shall consider, among other things, the following criteria set forth in Section 21601 of the Elections Code in determining those boundaries:

- a. Topography.
- b. Geography.
- c. Cohesiveness, contiguity, integrity, and compactness of territory.
- d. Community of interests of the districts.

19. Pacific's and RTC's petitions to modify D.96-08-042 so as to move the Folsom, Lincoln, Newcastle, and Pleasant Grove exchanges from the 530 to the 916 NPA better satisfy the criteria set forth in the previous findings of fact than the 530/916 boundary established in D.96-08-042, the 530/916 boundary proposed in Placer's petition to modify D.96-08-042, or the 530/916 boundary requested by El Dorado and Placerville.

20. Informing and educating telephone customers about the changes to the 530 and 916 area codes ordered by this decision will help customers prepare for these changes and thereby help reduce the costs, disruption, and confusion associated with changes to area codes.

#### **Conclusions of Law**

1. The following criteria should be used to evaluate the merits of Pacific's, Placer's, and RTC's petitions to modify the 530/916 area code boundary adopted in D.96-08-042, as well as the merits of the request by the El Dorado and Placerville to modify D.96-08-042:

- a. Minimize the impact to existing customers in the exhausting NPA.
- b. Optimize the life of the old and new NPAs.
- c. Meet statutory requirements.
- d. Meet the projected exhaustion date of the old NPA.

- e. Balance the impact to the telecommunications industry.
  - f. Have an equitable impact on all existing and potential NXX code holders.
2. Pacific's and RTC's petitions to modify D.96-08-042 so as to move the Lincoln, Newcastle, Pleasant Grove, and Folsom exchanges from the 530 NPA to the 916 NPA should be granted.
3. Placer's petition to modify D. 96-08-042 should be denied.
4. The request by El Dorado and Placerville to modify the 530/916 boundary established in D.96-08-042 should be denied.
5. Telephone corporations should form a committee, chaired by the CCA, for the purpose of collectively preparing a plan for customer notification and education regarding the modifications to the 530 and 916 area codes required by this order.
6. The telephone corporations should submit their plan for customer notification and education to the Commission's Public Advisor for the Public Advisor's review and approval.
7. Each telephone corporation should bear its own costs to educate its customers regarding the changes to 530 and 916 area codes required by this order.
8. This order should be effective today.
9. Case (C.) 96-03-039 and C.96-03-040 should be closed.

## O R D E R

### IT IS ORDERED that:

1. Roseville Telephone Corporation's (RTC's) petition to modify Decision (D.) 96-08-042 is granted.
2. Pacific Bell's (Pacific's) petition to modify D.96-08-042 is granted to the extent it seeks to move the Lincoln, Newcastle, Pleasant Grove, and Folsom exchanges from the 530 NPA to the 916 NPA.
3. The County of Placer's petition to modify D.96-08-042 is denied.
4. The request by the County of El Dorado and the City of Placerville to modify D.96-08-042 so as to keep all of El Dorado County in the 916 area code is denied.



5. Local exchange carriers, competitive local carriers, and wireless carriers (referred to collectively as telephone corporations) shall form a committee, chaired by the California Code Administrator (CCA), for the purpose of collectively preparing a plan for customer notification and education regarding the modifications to the 530 and 916 area codes required by this order.

6. No later than 30 days following the date of this order, the telephone corporations shall submit their plan for customer notification and education to the Commission's Public Advisor for the Public Advisor's review and approval. The CCA shall also provide a copy of the plan to any party to this proceeding who requests a copy of the plan.

7. Each telephone corporation shall bear its own costs to educate its customers regarding the changes to the 530 and 916 area codes required by this order.

8. Case 96-03-039 and Case 96-03-040 are closed.

This order is effectively immediately.

Dated June 11, 1997, at San Francisco, California.

P. GREGORY CONLON

President

JESSIE J. KNIGHT, JR.

HENRY M. DUQUE

JOSIAH L. NEEPER

RICHARD A. BILAS

Commissioners