

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
LEGAL
WORKING FILE

FROM: CAROLEE HALL

DATE: MARCH 16, 2016

RE: QWEST CORPORATION DBA CENTURYLINK QC (“CENTURYLINK”) PETITION FOR A WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO’S NAMPA RATE CENTER; CASE NO. QWE-T-16-03.

BACKGROUND

On March 14, 2016, the Commission received a petition for a waiver of numbering resource guidelines from Qwest Corporation dba CenturyLink QC (“CenturyLink”). In this petition, CenturyLink indicated that it has a large customer in the Nampa, Idaho area that is requesting a full NXX (10,000 consecutive numbers) ending with either 3, 5 or 8 to incorporate with the existing internal dialing plan. CenturyLink filed this waiver following Neustar’s denial of the Company’s Application for additional numbering resources.

In January 2015, CenturyLink filed its request with Neustar and its Application was denied due to the “Months to Exhaust” (MTE) calculation for the rate center. According to the report, the MTE for the Nampa rate center exceeds the FCC guidelines.¹ The FCC has delegated authority to state commissions to waive the FCC threshold required for releasing numbering resources where there is a demonstrated need, through a process called the “safety valve.” *Third Report and Order on Reconsideration*, CC Docket No. 99-200, 17 F.C.C.R. 252 (2001) and *Errata* (Feb.2, 2002) (the “*Optimization Order*”).

¹ To be assigned an additional thousands-block (NPA-NXX) for growth, “Months to Exhaust” must be less than or equal to 6 months. 47 C.F.R. § 52.15 (g)(3)(iii).

STAFF ANALYSIS

Staff contacted the Company requesting the Full NXX to discuss resource demand. Staff was concerned that recommending an entire code dedicated to one organization may compromise the remaining 208 inventory that is rapidly approaching exhaust. After some constructive discussions with the Company, it was decided that they could use seven of the ten blocks within the code and agreed to return three to the pool. This will satisfy the Company's request as well as providing numbers in the Nampa rate center for future requests. Staff contacted CenturyLink to discuss the specifics of the arrangement and asked that they contact Neustar and reserve the 208-205 NPA satisfying the Company's request for an NXX ending in a 3, 5 or 8. Staff appreciates the Company and CenturyLink's efforts to work through possibilities to resolve the numbering request while preserving the 208 resources.

RECOMMENDATION

Staff recommends that the Commission approve CenturyLink's petition for a waiver for the NPA NXX of 208-205 with the understanding that the Company will assign the first seven blocks and return the remaining three to the pool.

COMMISSION DECISION

Does the Commission agree?



Carolee Hall

u/chall/decision memo/numbering-Safety Valve Requests/Qwest Corporation dba Century Link QC (CenturyLink) QWE-T-16-03