

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
LEGAL
WORKING FILE

FROM: CAROLEE HALL

DATE: JUNE 7, 2011

RE: CENTURYLINK'S PETITION FOR A WAIVER OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO'S
GRANDVIEW RATE CENTER; CASE NO. CEN-T-11-02.

BACKGROUND

On May 27, 2011, the Commission received a Petition for a waiver of numbering resource guidelines from CenturyTel Gem State, Inc. dba CenturyLink of Idaho ("CenturyLink"). The waiver was filed following Neustar's denial of the Company's Application for additional numbering resources. In this Petition, CenturyLink indicated that on May 18, 2011 it had requested an additional thousands block of numbers in the 208-834 Grandview rate center.¹ The Company filed its request with Neustar on behalf of a customer in the Grandview area that requires a group of sequential numbers.

There are ten blocks in the Grandview rate center and CenturyLink currently holds the 208-834-2 block. CenturyLink's customer requires 100 sequential telephone numbers and is unable to use blocks beginning with 0 or 9. Because CenturyLink cannot fulfill this request with its current inventory of numbers it is required to petition Neustar to open a new code in the Grandview rate center.

CenturyLink's Neustar Application was denied due to the "months to exhaust" (MTE) calculation for the Grandview Rate Center. According to the report, the MTE for the Grandview rate center is 2083.832 (173.65 years), which means that given the low demand for numbers in

¹ A block of numbers consists of 1,000 consecutive telephone numbers within an area code. (208-834-0XXX through 208-834-9999)

that rate center and the total available numbers in the 208-834 code inventory, there should be enough 208-834 telephone numbers to last 173.65 years. However, as previously discussed there are not 100 sequential numbers in CenturyLink's current inventory.

STAFF ANALYSIS

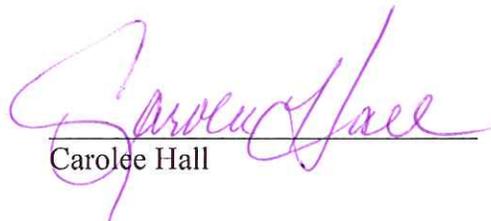
Staff has reviewed the request for waiver of the "months to exhaust" threshold requirements and notes that the CenturyLink customer is a single entity that asserts it needs these numbers as a result of expansion in its business. These numbers will be held solely by this requesting customer and will enable it to meet its need to expand by 100 DID numbers.

RECOMMENDATION

Staff recommends that the waiver request for 100 consecutive numbers be granted to CenturyLink for its customer. Specifically, Staff recommends that NPA NXX X (208-834-3) be released to CenturyLink for its Grandview customer.

COMMISSION DECISION

Does the Commission agree?


Carolee Hall

u/chall/decision memo/numbering/CenturyLink's Grandview Safety Valve Request CEN-T-11-02