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IDAHO PUBLIC
UTILITIES COMMISSION

Via Overnight Delivery

December 19, 2011

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

ELI-T-11-01

NEW CASE

Re: Request for Waiver of Numbering Resource Requirements for Electric Lightwave, LLC dba Integra Telecom of Behalf of Large Idaho Customer

Dear Ms. Jewell:

Included for filing with the Idaho Public Utilities Commission is the original plus seven copies of this letter petition and supporting documents for the request of Electric Lightwave, LLC dba Integra Telecom (Integra), on behalf of one of its customers for additional numbering resources, and a waiver of the Industry Numbering Committee's Central Office Code (NXX) Assignment Guidelines.

INTRODUCTION

In accordance with Federal Communications Commission rules found at 47 C.F.R. § 52.15(g)(3)(iv)¹ and pursuant to Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC Guidelines") Integra respectfully requests a waiver of the numbering resource guidelines in order to secure a full, 10,000-number code block for one of its large customers that is consolidating much of its business and IT operations within the Boise rate center.

SUPPORT FOR REQUEST

Central Office Code (NXX) Assignment Guidelines, Section 4.1.3 state that a service provider requesting LRNs for a rate center in which the service provider already has numbering resources must meet certain months-to-exhaust and utilization requirements. Although Integra has not yet reached the months-to-exhaust and utilization criteria for the assignment of additional numbering resources in the Boise rate center, it is making this request on behalf of a large customer consolidating its operation in Boise. Enclosed please find a copy of the Pooling Administrator's response to Integra's request for the additional numbering resources and the Company's Months-to-Exhaust and Percent Utilization report (Attachments A and B).

¹ 47 C.F.R. 52.15(g)(3)(iv) states in part: "[t]he carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."

The customer has explained its request and its plans for the use of these numbering resources in Confidential Attachment C. The customer has indicated that they prefer an entire 208-NXX-0001 through 9999 number series but have no preference as to the specific NPA code. Integra anticipates that once the customer receives and activates the telephone numbers requested, the old numbers will be returned and ultimately absorbed back into the numbering resources of other Idaho carriers, primarily Qwest/CenturyLink.

Integra's Pooling Administration System (PAS) contact is:

Zack Jones
Phone: 925-363-7653
Fax: 925-363-7686
Email: zack.jones@neustar.biz

Federal Communications Commission Rule 47 C.F.R.(g)(3)(iv) states in part: "[t]he carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."

CONCLUSION

Integra respectfully requests that the Idaho Public Utilities Commission grant its petition and direct the Pooling Administrator, Nuestar, to release additional numbering resources to the Company, so that it may meet the needs of its customer.

Thank you for your assistance in this matter. If you have any questions or concerns, please contact the undersigned directly.

Sincerely,



Cathy Murray
Manager, Regulatory Affairs
Phone: 763-745-8466
Fax: 763-745-8459
E-mail: camurray@integratelecom.com

Enclosures

Attachment A

Murray, Catherine A.

From: zack.jones@neustar.biz
Sent: Thursday, December 01, 2011 4:50 PM
To: Long, Donna X.; Bell, Jeanne
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 208-BOISE-ID-500145

Pooling Administration System

Dated 01-December-2011

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 208-BOISE-ID-500145

Date of Application: 11/29/2011 **Effective Date:** _____
Date of Receipt: 11/29/2011 **Date of Response:** 12/01/2011

Service Provider Name: ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - ID
(Telcordia™ LERG™
Routing Guide) OCN: 7865

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Zack Jones _____ **Phone:** 925-363-7653
Signature of Pooling Administrator
Zack Jones _____ **Fax:** 925-363-7686
Name (print)
Email: zack.jones@neustar.biz

NPA-NXX or NPA-NXX-X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation Expiration Date : _____
Block/Code Modified : _____
Block/Code Disconnected : _____

Block Contaminated(Yes or No) :

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

Rate Center:

Rate Center Sub Zone:

BOISIDPZPS0

BOISE

Form Complete, request denied.

Explanation:

DR-33: We are unable to process your application to replenish the pool. Records indicate there are enough resources in the current inventory to fulfill your need.

If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

neustar

Attachment B

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **208-BOISE-ID-500145**

Date: **11/29/2011**

OCN:**7865**

Company Name:**ELECTRIC LIGHTWAVE, LLC
DBA INTEGRA TELECOM - ID**

Rate Center: **BOISE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):**NPA NXX BLOCK ID 208 246 0 through 8 208 258 2 and 6 208 272 2 through 8 208 275 0 through 8 208 287 0 through 9 208 391 4 208 474 A 208 577 2 through 5 208 639 3 through 8 208 854 3 through 8 208 908 4 and 5 208 947 0 through 9 208 954 5 and 8 208 991 5 for a total of 88 blocks**

Name of Block Applicant:**Jeanne Bell**

Signature: **Jeanne Bell**

Title:**Number Administrator**
503-453-8284

Telephone No.: **503-453-8279**

FAX No.:

E-mail: **jeanne.bell@integratelecom.com**

A. Available Numbers:**3686**

B. Assigned Numbers: **84304**

C. Total Numbering Resources:**88000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²:**0**

List
Excluded
Code(s) or
Block(s):

Month												
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth History - Previous 6 months³
78 435 660 561 262 390

F. Forecast - Next 12 months⁴
4200 390 390 390 390 390 390 390 300 300 300 300

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):1025.0

H. Months to Exhaust⁵
 =
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	3686	3.596
2	4686	4.572
3	5686	5.547

I. Utilization⁶
 =
$$\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{95.8}$$

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be