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IDAHO PUBLIC  
UTILITIES COMMISSION

October 16, 2012

***Via Hand Delivery***

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702-5983

*FMT-T-12-01*

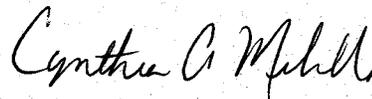
**RE: PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS  
FOR NUMBERING RESOURCES FOR FRUITLAND, IDAHO**

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of a PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR FRUITLAND, IDAHO filed by Farmers Mutual Telephone Company. Attachment A is considered trade secret and confidential pursuant to Section 9-340D(1) of the Idaho Code, and is submitted to you on yellow paper.

If you have any questions, please contact me. Thank you for your assistance in this matter.

Sincerely,

  
Cynthia A. Melillo

CAM/  
cc: Dan Greig (via electronic mail)  
Enclosures

Cynthia A. Melillo PLLC  
Cynthia A. Melillo (ISB. No. 5819)  
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Attorney for Farmers Mutual Telephone Company

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR FRUITLAND, IDAHO	Case No. <u>FMT-T-12-01</u>
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**REQUEST FOR WAIVER FOR ADDITIONAL NUMBERING RESOURCES**

Farmers Mutual Telephone Company ("Farmers"), by and through its undersigned attorney, and pursuant to IDAPA 31.01.01.256, files the following Request for Waiver of certain FCC threshold requirements for the release of numbering resources. Farmers petitions the Commission for review of the denial by the administrator of the North American Numbering Plan, NeuStar, of Farmers's application for use of central office, code numbering resources in area code 208.

Specifically, Farmers requests waiver of the utilization threshold requirements outlined in the FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200. Such waiver would allow NeuStar the authority to provide 1,000 sequential numbers to Farmers.

The 1,000 numbers in question are requested in the 208 NPA in the Fruitland Rate Center, and are required to meet a specific customer need in the Fruitland community. Farmers' customer requires 1,000 sequential numbers in an NX3 format to be incorporated into an existing dialing plan. Farmers's customer requests that these numbers be made available as soon as possible and no later than the end of the calendar year. The customer will begin using the numbers as soon as the waiver is granted and the numbers are released for service. The numbers will be added to existing inventory to accommodate the customer's expansion of operations. The customer initially made an oral request with the follow-up email attached hereto as Confidential Attachment A.

On September 28, 2012 Farmers submitted the customer's request for numbering resources to NeuStar. The request was immediately denied due to the "months to exhaust" calculations and/or utilization requirements for the Fruitland Rate Center. See Attachment B. The waiver requested here is for the "months to exhaust" usage threshold for numbering requests.

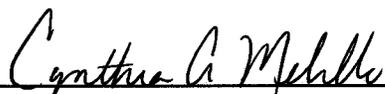
The FCC permits a waiver of the kind requested here when there is a

demonstrated need, such as a specific customer request for numbers. The waiver process is specifically addressed in the FCC Third Report and Order ("Order") as the "safety valve" process. See FCC 01-362, ¶¶ 57-66 (Mar. 14, 2002). The Order delegates the authority to hear requests for waivers to the state commissioners and recommends that state commissions act expeditiously. See *Id.*, ¶¶ 61, 66.

Farmers respectfully requests that the Commission approve this Request for Waiver of the "months to exhaust" threshold requirements and direct NeuStar to provide 1,000 sequential numbers in the NX3 in the Fruitland Rate Center in the 208 NPA as outlined above, to meet Farmers' customer's request.

Submitted this 16<sup>th</sup> day of October, 2012.

Cynthia A. Melillo PLLC

By   
Cynthia A. Melillo  
Attorneys for Farmers Mutual  
Telephone Company

**ATTACHMENT A**

**THIS EXHIBIT ALLEGEDLY CONTAINS TRADE SECRETS  
OR CONFIDENTIAL MATERIAL AND IS SEPARATELY  
FILED**

**ATTACHMENT B**

From: <dora.wirth@neustar.biz>  
Date: Fri, Sep 28, 2012 at 2:51 PM  
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 208-FRUITLAND-ID-571550  
To: dan@fmtc.com  
Cc: PA\_Part3@neustar.biz

## Pooling Administration System

Dated 28-September-2012

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 208-  
FRUITLAND-  
ID-571550

Date of Application: 09/28/2012      Effective Date:  
Date of Receipt: 09/28/2012      Date of  
Response: 09/28/2012

Service Provider Name: FARMERS MUTUAL TELEPHONE CO.  
(Telcordia <sup>TM</sup> LERG  
<sup>TM</sup> Routing Guide ) 2221  
OCN:

NPAC SOA SPID :

### Pooling Administrator Contact Information:

Dora Wirth      Phone: 925-363-7653  
Signature of Pooling Administrator  
Dora Wirth      Fax: 925-363-7686  
Name (print)  
Email: dora.wirth@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):<sup>1</sup> FRLDIDXXDS1  
Rate Center: FRUITLAND  
Rate Center Sub Zone: FRUITLAND

**X Form Complete, request denied.**

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. 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:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for

the purpose of routing calls. This must be the CLLI™ 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.)