



RECEIVED

2013 JUN 10 AM 8:58

IDAHO PUBLIC
UTILITIES COMMISSION

June 3, 2013

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83702

POT-T-13-02

RE: Safety Valve Request of Potlatch Telephone Company d/b/a TDS Telecom for review of NeuStar Pooling Administrator Denial of Application for Numbering Resources

Dear Ms. Jewell,

Potlatch Telephone Company d/b/a TDS Telecom submits this request to the Idaho Public Utilities Commission (Commission) for review and waiver of the NeuStar Pooling Administrator's denial of our request for additional numbering resources necessary to obtain a LRN for a new switch that will be installed in Kendrick, ID.

On May 30, 2013 TDS Telecom submitted a Code Request for an additional LRN to the Pooling Administrator for the assignment of one block of 1000 telephone numbers in the 360 area code. The Pooling Administrator denied the request because TDS Telecom did not meet the months to exhaust (MTE) or utilization criteria established by the FCC.

As the Commission is aware, the FCC has adopted a safety valve mechanism to allow carriers that do not meet utilization criteria in a given rate center to obtain additional numbering resources. TDS Telecom is installing a new Metaswitch in its Kendrick, ID location and thus requires one unique NPA-NXX assigned for a LRN to be provisioned to identify the switch or POI in the number portability capable network.

The industry Location Routing Number (LRN) Assignment Practices (ATIS-0300065) document provides that:

1. A unique LRN will be provisioned to identify each recipient switch or POI in the number portability capable network.
2. A service provider will establish one (1) LRN per LATA from an assigned NXX for each recipient switch or POI in the number portability capable network.

From a number conservation perspective, TDS Telecom is requesting to be assigned all 10 blocks within the new NPA-NXX with the provision that TDS Telecom will protect all 10,000 numbers from permanent customer assignment. What this will do is prevent the nine unused blocks from being returned to the Pool and thus would prevent the possibility that another carrier request and be assigned one of the blocks from the new NPA-NXX. As such, this would help ensure the numbers do not become permanently stranded in the Kendrick, ID rate center.

PO BOX 1566
OREGON CITY, OR 97045-1566

OFFICE: 503.656.8399
FAX: 503.656.8660

After TDS Telecom has migrated all customers to the new switch and removed our legacy switch from the network, we will migrate the existing NPA-NXX and LRN to the new switch and will return the entire new code that is currently being requested. TDS Telecom will return the new code within 12 months of collapse of the new legacy switch. In the event the 208 NPA falls into relief planning prior to the return of the code, the Commission may request TDS Telecom to provide a progress report regarding the switch migration in Kendrick and request TDS Telecom to try and expedite the migration so the new NPA-NXX can be returned and repurposed elsewhere in the 208 area code geography.

The Pooling Administrators decision violates the intent and requirement of the FCC and Commission in allowing carriers access to numbering resources to meet the required stands of portability in the network and the Pooling Administrators denial of numbering resources interferes with TDS Telecom to install a new switch in the Kendrick, ID rate center.

We respectfully request approval of this request as filed. If you have questions or concerns regarding this information please contact either Gail Long at 503-656-8399 or gail.long@tdstelecom.com or myself at paul.nejedlo@tdstelecom.com or 608-664-4659. Thank you in advance for your help on this issue.

Sincerely,

/s/ Paul Nejedlo

Paul Nejedlo
Sr. Administrator, Number Management

Enclosures: 4

Cc: Gail Long – TDS Telecom

Thousands-Block Application Form - Part 1A

Tracking Number: **208-
KENDRICK-ID-
637454**
Full NXX: LRN

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **POTLATCH TELEPHONE CO., INC.**
Headquarters Address: **525 Junction Rd**
City, State, Zip: **Madison, WI, 53717**
Contact Name: **Paul Nejedlo**
Contact Address: **525 Junction Rd**
City, State, Zip: **Madison, WI, 53717**
Phone: **608-664-4659** FAX: **_** E-mail: **paul.nejedlo@tdstelecom.com**

Pooling Administrator: ⁱⁱ

Contact Name: **Dora Wirth**
Contact Address: **1800 Sutter St.**
City, State, Zip: **Concord, CA, 94520**
Phone: **925-363-7653** FAX: **925-363-7686**
E-mail: **dora.wirth@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ X

NPA: **208** LATA: **676** ^{iv} OCN: **2230** Parent Company's OCN **0881**

Number of Thousands-Blocks Requested : **1**

Switching Identification(Switch Entity/POI) : ^v **KNDRIDXXGT0**

City or Wire Center Name : **KENDRICK** Rate Center: ^{vi} **KENDRICK**

Rate Center Sub Zone: **KENDRICK**

1.3 Dates:

Date of Application: ^{vii} **05/30/2013**

Requested Block Effective Date: ^{viii} **11/29/2013**

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective

date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No **X** _____

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : **Incumbent Local Exchange Carrier (ILEC)** (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : **Wireline**
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) **208-500**
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) **208-xxx-1,**

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes **X** _____ If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

- OCN:Intra-company ^{ix} Switching Id Part 1B
- OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Paul Nejedlo

Sr.
Administrator **05/30/2013**

Signature of Block Applicant

Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

**Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005**

Tracking Number: 208-KENDRICK-ID-637454
Full NXX: LRN

Type of Application: **New** **Change**¹ **Delete**

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: POTLATCH TELEPHONE CO., INC.

Headquarters Address: 525 Junction Rd

City, State, Zip: Madison ,WI ,53717

Contact Name: Paul Nejedlo

Contact Address: 525 Junction Rd

City,State,Zip: Madison, WI, 53717

Phone: 608-664-4659 FAX: E-mail: paul.nejedlo@tdstelecom.com

Code Administrator:²

Name: David Morgan

Address: 46000 Center Oak Plaza

City,State,Zip: Sterling ,VA ,20166

Phone: 571-434-5381 FAX:571-434-5502

1.2 NPA: 208 NXX:³ LATA: 676 OCN:⁴ 2230 Parent
Company's OCN(s) 0881

Switching Identification(Switch Entity/POI) ⁵ KNDRIDXXGT0

Locality/City/Wire Center: KENDRICK Rate Center: ⁶ KENDRICK

Homing Tandem Operating Co: ⁷ QWEST CORPORATION Tandem Homing CLLI ⁸ :SPKNWA01C9T

1.3 Dates: Date of Application: 05/30/2013 Request Effective Date: ⁹ 11/29/2013
¹⁰

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes _____ No X

- 1.4 a) Type of company/entity requesting the code: Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)
- b) Types of service: Wireline (e.g., Cellular - Type 2)
- c) Code Assignment Preference (Optional) 208-500
- d) Codes that are undesirable, if any _____

e) Type of change(Mark **all** that apply)

- OCN-Intra-company ¹¹ Switching Id Rate Center Tandem Homing CLLI
 OCN-Inter-company ¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRRDS will not begin until input into BIRRRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁴

Paul Nejedlo

Signature of Code Applicant

Sr.

Administrator

Title

05/30/20

13

Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ 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, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ An incomplete form may result in delays in processing this request.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 208-KENDRICK-ID-637454

Date: 05/30/2013

OCN: 2230

Company Name: POTLATCH TELEPHONE CO., INC.

Rate Center: KENDRICK

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 208-289-2, 3, 4, 5, 6, 7, 8

Name of Block Applicant: Paul Nejedlo

Signature: Paul Nejedlo

Title: Sr. Administrator

Telephone No.: 608-664-4659

FAX No.:

E-mail: paul.nejedlo@tdstelecom.com

A. Available Numbers: 6405

B. Assigned Numbers: 595

C. Total Numbering Resources: 7000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation²: 0

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

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

E. Growth
History -
Previous 6
months³

<u>7</u>	<u>3</u>	<u>6</u>	<u>4</u>	<u>3</u>	<u>2</u>							
----------	----------	----------	----------	----------	----------	--	--	--	--	--	--	--

F.
Forecast -
Next 12
months⁴

<u>5</u>												
----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 5.0

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

6405

Months To Exhaust

1281.00

I.
Utilization⁶
=

Assigned Numbers(B) - Excluded
Numbers(D)

X 100 = **8.5**

Total Numbering Resources(C)-Excluded
Numbers(D)

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 less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

**Pooling Administrator's Response/Confirmation
TBPAG Part 3**

Tracking Number : 208-KENDRICK-ID-637454

Date of Application: 05/30/2013 Effective Date:
Date of Receipt: 05/30/2013 Date of Response: 05/30/2013

Service Provider Name: POTLATCH TELEPHONE CO., INC.
(Telcordia TM LERG TM
Routing Guide) OCN: 2230
Parent Company OCN: 0881

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): ¹ KNDRIDXXGT0
Rate Center: KENDRICK
Rate Center Sub Zone: KENDRICK

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:

¹ 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.)