

## DECISION MEMORANDUM

**TO:** COMMISSIONER KEMPTON  
COMMISSIONER SMITH  
COMMISSIONER REDFORD  
COMMISSION SECRETARY  
LEGAL  
WORKING FILE

**FROM:** CAROLEE HALL

**DATE:** OCTOBER 28, 2009

**RE:** PROJECT MUTUAL TELEPHONE'S PETITION FOR A WAIVER OF  
FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES  
IN IDAHO'S TWIN FALLS RATE CENTER; CASE NO. PRJ-T-09-01.

### BACKGROUND

On October 21, 2009, Project Mutual filed a formal request for a waiver of numbering resource guidelines following denial of its Application filed with Neustar, the North American Numbering Plan Administrator (NANPA). According to its Application, Project Mutual's customer requires 10 sequential blocks (i.e., ten blocks of 1000 numbers) of numbers so as to ensure all phases will have the same prefix and be sequential and fit into the customer's dial-plan. Project Mutual's customer needs these numbers as soon as possible, and will begin using them as soon as the Request for Waiver is granted and the numbers are released for service. Once the new numbers are put into service, the customer plans to return 2,200 of its existing numbers.

On September 15, 2009, Project Mutual submitted an automated worksheet to Neustar via its online system to obtain numbering resources necessary to meet the demand of its customer in Twin Falls, Idaho. Project Mutual's Application was denied due to the "months to exhaust" (MTE) and/or Utilization requirements not adequately met. To be assigned a full code to meet the customer's request, Project Mutual was instructed to request a State Waiver.

## STAFF ANALYSIS

Staff has reviewed the request for waiver of the requirements and notes that the customer is a single entity that asserts it needs these numbers as a result of an expansion in its business. These numbers will be held solely by this requesting customer and will enable it to meet its demand for sequential numbers in Twin Falls.

Project Mutual participates in the thousand-block-pooling in the Twin Falls rate center. Methods such as pooling and rate center consolidation help make number conservation efforts more effective, and are designed to extend the time it takes to exhaust a rate center's number resources. After evaluating Project Mutual's request for its customer, Staff believes that granting this requested waiver will result in an efficient use of Idaho's numbering resources. According to FCC orders and numbering guidelines, carriers may appeal NANPA decisions of this nature to the appropriate state regulatory authority. The Commission has granted similar waivers in the past to meet the requests of larger customers. (See Order Nos. 28769, 29279, 30351 and 30427).

## RECOMMENDATION

Staff recommends that the request for authority to provide 10,000 numbers, a full NXX, be granted to Project Mutual for its customer's request with the caveat that the customer return 2,200 numbers as stated in its Application and that all numbers be used sequentially. In addition, any thousand blocks that are not used within six months of issuance of the NXX shall be returned to the NANPA.

## COMMISSION DECISION

Does the Commission agree with Staff's recommendation?



Carolee Hall

u/chall/decision memo/numbering/Project Mutual's Safety Valve Request PRJ-T-09/01