

DECISION MEMORANDUM

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

FROM: CAROLEE HALL

DATE: APRIL 14, 2005

RE: QWEST'S APPLICATION FOR WAIVER TO ACQUIRE NEW
NUMBERING RESOURCES IN IDAHO FALLS, IDAHO.
CASE NO. QWE-T-05-07.

BACKGROUND

On March 14, 2005, the Commission received a request for a waiver from Qwest Corporation following denial of their Application filed with Neustar, the North American Numbering Plan Administrator (NANPA). According to its Application, on February 14, 2005, Qwest requested 3000 additional numbers in the IDFLIDMADS1 switch in the Idaho Falls rate center where the Company confirmed that it did not have numbers meeting its customer's criteria.

On or about March 8, 2005, Qwest submitted an automated Part 1A and MTE (Months to Exhaust) Worksheet to Neustar via its online system (PAS) to obtain numbering resources necessary to meet the demands of its customer in Idaho Falls, Idaho. Qwest's Application was denied because it did not meet the months-to-exhaust criteria of 6 month as set forth in the NANPA's guidelines for each rate center. Qwest's pooling numbering resources, in this particular rate center, may exhaust in approximately 108 months. Therefore, there are more than enough numbers available for this request. The reason for the denial was based upon Qwest's utilization calculation of 73.561 percent, which is slightly below the required 75 percent for Idaho.

Qwest asserts that NANPA's denial impedes its ability to serve its customers within the state of Idaho

STAFF ANALYSIS

Qwest participates in the thousand-block-pooling in the Idaho Falls rate center. While methods such as pooling and rate center consolidation help make number conservation efforts more effective, they are designed to extend the time it takes to exhaust (MTE) a rate center's number resources. Further, Staff does not believe granting the requested waiver will result in an inefficient use of Idaho's numbering resources. According to FCC orders and numbering guidelines, carriers can appeal NANPA decisions of this nature to the appropriate state regulatory authority.¹ The Commission has granted similar waivers in the past to meet the requests of larger customers. (See Order Nos. 28769 and 29279.)

RECOMMENDATION

Staff recommends that the request for waiver sought by Qwest Corporation be granted so that the Company can service the specific needs of its Idaho Falls customer. Staff also recommends that Qwest continue to follow FCC numbering guidelines by assigning numbers in 1,000 blocks as demand requires before opening new 1,000 blocks within an assigned prefix. Further, Staff recommends that Qwest remind its customer that unused 1,000 blocks will be returned to the NANPA within six months.

COMMISSION DECISION

Should the request for waiver from Qwest Corporation be approved?


Carolee Hall

u/chall/decision memo/QWE-T-05-07 Waiver of FCC Numbering Resources Idaho Falls

¹ Number Optimization Order. CC Docket No. 99-200 and 96-98, FCC 00-104, rel. March 31, 2000.