

DECISION MEMORANDUM

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

FROM: CAROLEE HALL

DATE: AUGUST 30, 2007

RE: QWEST CORPORATION'S PETITION FOR A WAIVER OF FCC
THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES IN
IDAHO'S BOISE RATE CENTER; CASE NO. QWE-T-07-6.

BACKGROUND

On August 22, 2007, Qwest Corporation filed a 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 August 22, 2007 Application, Qwest's customer requires 10 sequential blocks (i.e., ten blocks of 1000 numbers) of numbers in any NXX ending in digit 1 or 2. Qwest'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 1,000 of its existing numbers.

On August 9, 2007, Qwest submitted an automated worksheet to Neustar via its online system to obtain numbering resources necessary to meet the demand of its customer in Boise, Idaho. Qwest's Application was denied due to the "months to exhaust" (MTE) calculation for the Boise Rate Center. To be assigned an additional thousands-block (NXX-X) for growth, MTE must be less than or equal to six months. According to the Application attached to Qwest's request, the MTE for the Boise Rate Center is 161 months.

STAFF ANALYSIS

Staff has reviewed the request for waiver of the “months to exhaust” threshold requirements and notes that the customer is a single entity that asserts it needs these numbers as a result of expansion in its business. These numbers will be held solely by this requesting customer and will enable it to meet its 400,000 square foot building expansion in Boise.

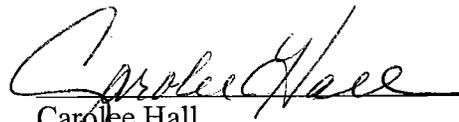
Qwest Corporation participates in the thousand-block-pooling in the Boise rate center. Methods such as pooling and rate center consolidation help make number conservation efforts more effective, and are designed to extend the time it takes to exhaust a rate center’s number resources. After evaluating Qwest’s request for its customer, Staff does not believe that granting this requested waiver will result in an inefficient 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 and 29279).

RECOMMENDATION

Staff recommends that the request for authority to provide 10,000 numbers, a full NXX, be granted to Qwest for its customer’s request with the caveat that all numbers be used sequentially and that any unused thousand blocks be returned to the NANPA within six months.

COMMISSION DECISION

Should the request for waiver from Qwest Corporation be granted along with the requirement that all numbers are used sequentially and any unused thousand blocks be returned to NANPA within six months?



Carolee Hall