

DECISION MEMORANDUM

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

FROM: CAROLEE HALL

DATE: AUGUST 10, 2011

RE: QWEST CORPORATION DBA CENTURYLINK QC (“QWEST”)
PETITION FOR A WAIVER OF FCC THRESHOLD REQUIREMENTS
FOR NUMBERING RESOURCES IN IDAHO’S NAMPA RATE CENTER;
CASE NO. QWE-T-11-07.

BACKGROUND

On August 5, 2011, the Commission received a Petition for a waiver of numbering resource guidelines from Qwest Corporation dba CenturyLink QC (“Qwest”). The waiver was filed following Neustar’s denial of the Company’s Application for additional numbering resources in the Nampa rate center. In this Petition, Qwest indicated that on August 2, 2011 it had requested an additional thousands block of numbers in the Nampa rate center. The Company filed its request with Neustar on behalf of a customer in the Nampa area that requires a thousands-block of sequential numbers.

Qwest’s Neustar Application was denied due to the “Months To Exhaust” (MTE) calculation for the rate center. According to the report, the MTE for the Nampa rate center exceeds the FCC guidelines.¹ Moreover, Qwest’s customer requested the thousands-block of 208-NX3, which was not available.

¹ To 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)).

STAFF ANALYSIS

Staff contacted Qwest to discuss the customer's specific request. Because there were no numbers available that reflected the customer's wishes, Qwest contacted its customer and discussed the necessary assignment requirements. After discussions, it was determined that the customer could use the 208-505-2 block (one thousand telephone numbers) thereby, avoiding the need to open a complete code (10,000 telephone numbers). This action helped preserve 10,000 numbers in the Idaho 208 area code inventory. Staff has reviewed the request for waiver of the "months to exhaust" threshold requirements and notes that the Qwest customer is a single entity that asserts it needs these numbers as a result of expansion for its business. These numbers will be held solely by this requesting customer and will enable it to expand its business thereby meeting specific customer needs in the Nampa community.

RECOMMENDATION

Staff appreciates Qwest's efforts to find an alternative numbering resource plan that avoided having to open a new code for one thousand numbers. Staff recommends that the waiver request for one thousand sequential numbers be granted to Qwest for its customer. Specifically, Staff recommends that reserved NPA NXX X (208-505-2) be released to Qwest for its Nampa rate center customer.

COMMISSION DECISION

Does the Commission agree?



Carolee Hall

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