

CENTURYLINK
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Maura E. Reynolds
Paralegal
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UTILITIES COMMISSION



April 28, 2015

VIA OVERNIGHT DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

RE: Docket No. QWE-T-15-04

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of the Petition of CenturyLink for Waiver of FCC Threshold Requirements for Numbering Resources for Pocatello, Idaho. CenturyLink is re-filing these documents to include confidential and public versions.

If you have any questions, please contact me.

Sincerely,


Maura Reynolds

/mer

Enclosures

(REDACTED) CONFIDENTIAL ATTACHMENT A

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2015 APR 29 PM 2: 37

IDAHO PUBLIC
UTILITIES COMMISSION

James B. Farr
Regulatory Affairs Director – Idaho and Utah
Room 1601
250 Bell Plaza
Salt Lake City, Utah 84111

Office: 801-238-0240
Fax: 801-237-6542
james.farr@centurylink.com

April 20, 2015

Idaho Public Utilities Commission
Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

QWE-T-15-04

Dear Ms. Jewell:

Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) submits this confidential letter to the Idaho Public Utilities Commission requesting a waiver of the months-to-exhaust and utilization threshold requirements outlined in the Numbering Resource Optimization Orders (CC Docket No. 99-200, FCC 00-429 & FCC 01-362). This waiver is being requested in order to allow Neustar Inc., the Pooling Administrator for the state of Idaho, to provide CenturyLink with a 1K Block (one thousand numbers) for the Pocatello Rate Center. This request is to deploy new technology for our customers. The new technology

(CONFIDENTIAL INFORMATION REDACTED)

CenturyLink submitted a Part 1A and MTE Worksheet to Neustar/PA on April 14, 2015, requesting numbering resources to meet the requirements for the new GPON technology. The request was denied through a Part 3 denial. Thus, a waiver by the Idaho Public Utilities Commission is necessary so that CenturyLink can provide the new fiber to the home technology. *(Please see attached request from CenturyLink to NANPA/PA with denial labeled Confidential Attachment B)*

The FCC Second Report and Order on Numbering Resource Optimization allows for a waiver of the rules when there is a demonstrated need such as a “specific customer request for a large block of numbers.” *(See FCC 00-429, ¶ 186)* or in cases where carriers “have demonstrated a verifiable need for additional numbering resources outside of these specifically enumerated instances.” *(See FCC 01-362, ¶ 61)*. The waiver process is more specifically addressed in the FCC Third Report and Order as the “safety valve” process *(FCC 01-3 62, see ¶¶ 5 7-66)*. The Third Report and Order delegates the authority to hear claims for waivers to the state

Jean Jewel, Secretary
April 20, 2015
Page 2

commissions and recommends they act expeditiously and proposes a waiver be reviewed within 10 business days. (See paras. 61, 66).

CenturyLink respectfully requests the Idaho Public Utilities Commission approve its waiver and direct Neustar Inc. to assign to CenturyLink a 1K Block (1,000 numbers) from the Industry Pool Inventory that satisfies the requirement in the Pocatello Rate Center allowing CenturyLink to deploy the new GPON technology. The directive can be mailed to:

John Auerbach
Pooling Administrator
NeuStar, Inc.
1800 Sutter Street, Suite 780
Concord, CA 94520
Email: john.auerbach@neustar.biz
Fax: 925-363-7684

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact me or Bruce Bennett at CenturyLink (303) 707-7013.

Sincerely,



James B. Farr
Regulatory Affairs Director

Attachment

cc: Bruce Bennett, CenturyLink

Rate Center: ^{vi} _____

1.3 Dates:

Date of Application: ^{vii} 04/14/2015 Requested Block Effective Date: ^{viii} 05/15/2015

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 X No _____

Expedited Explanation:

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) _____
- 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) _____

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 _____ or 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 _____ or No _____

CONFIDENTIAL ATTACHMENT B

d) Has this block been protected from further assignment: Yes _____ or 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.

Bruce Bennett

Senior Lead Analyst - Numbering Operations

04/14/2015

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 iconectiv™ 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 iconectiv Telecom 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

CONFIDENTIAL ATTACHMENT B

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.

Footnotes:

- 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 CLLITM 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 PSTN 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} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number:

Date: Tuesday, April 14, 2015 OCN:9636

Company Name:QWEST CORPORATION

Rate Center:]

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²

Name of Block Applicant:Bruce Bennett

Signature: Bruce Bennett

Title:Senior Lead Analyst - Numbering Operations
FAX No.: 303-707-9577

Telephone No.: 303-707-7013-

E-Mail: bruce.bennett@CenturyLink.com

A. Available Numbers

B. Assigned Numbers:

C. Total Numbering Resources

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³:0

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

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

E. Growth History - Previous 6 months⁴

<u>-110</u>	<u>190</u>	<u>-460</u>	<u>208</u>	<u>-149</u>	<u>-201</u>
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F. Forecast - Next 12 months⁵

<u>1000</u>	<u>0</u>										
--------------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------	-----------------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):**166.667**

H. Months to Exhaust⁶

$$= \frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	63519	381.113

I. Utilization⁷

$$= \frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \mathbf{46.301}$$

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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number :

Date of Application: 04/14/2015 Effective Date: _____
Date of Receipt: 04/14/2015 Date of Response: 04/14/2015

Service Provider Name: QWEST CORPORATION
(iconectiv™ LERG™
Routing Guide) OCN: _____
Parent Company OCN: _____

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706

Signature of Pooling Administrator

John Auerbach Fax: 925-363-7684

Name (print)

Email: john.auerbach@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 _ _____

Rate Center: _ _____

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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 TM Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)