

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
LEGAL
WORKING FILE

FROM: CAROLEE HALL

DATE: MAY 8, 2018

RE: QWEST CORPORATION DBA CENTURYLINK QC (“CENTURYLINK”) PETITION FOR A WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO’S BOISE RATE CENTER; CASE NO. QWE-T-18-04.

BACKGROUND

On May 1, 2018, the Commission received a petition for a waiver of numbering resource guidelines from Qwest Corporation dba CenturyLink QC (“CenturyLink”). In this petition, CenturyLink indicated that it has a large customer in the Boise, Idaho area that is requesting a full NXX (10,000 consecutive numbers). The company is requesting assignment preferences of 208-510, 208-516, or 208-517, to incorporate with the existing internal dialing plan of its customer. CenturyLink filed this waiver following Neustar’s denial of the Company’s Application for additional numbering resources.

On April 25, 2018, CenturyLink filed its request with Neustar and its Application was denied due to the “Months to Exhaust” (MTE) and/or usage threshold calculation for the rate center. According to the report, the MTE for the Boise rate center exceeds the FCC guidelines.¹ The FCC has delegated authority to state commissions to waive the FCC threshold required for releasing numbering resources where there is a demonstrated need, through a process called the “safety valve.” *Third Report and Order on Reconsideration*, CC Docket No. 99-200, 17 F.C.C.R. 252 (2001) and *Errata* (Feb.2, 2002) (the “*Optimization Order*”).

¹ To be assigned an additional thousands-block (NPA-NXX) for growth, “Months to Exhaust” must be less than or equal to 6 months. 47 C.F.R. § 52.15 (g)(3)(iii).

STAFF ANALYSIS

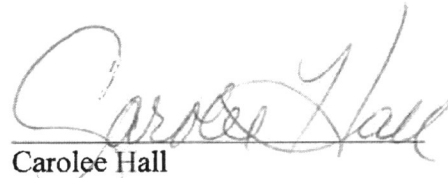
Staff has reviewed the Company's customer request and agrees that the growth in Idaho certainly has increased the demand for numbering resources. Staff agrees with the request.

RECOMMENDATION

Staff recommends that the Commission approve CenturyLink's petition for a waiver for 10,000 sequential numbers within the 208 NPA, either the 510, 516 or 517 NXX.

COMMISSION DECISION

Does the Commission agree?



Carolee Hall

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