

## Jean Jewell

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**From:** Jean Jewell  
**Sent:** Friday, September 20, 2013 8:46 AM  
**To:** Jean Jewell  
**Subject:** FW: tw telecom request for waiver for City of Boise, ID  
**Attachments:** Attachment A.pdf; Attachment B.pdf  
**Importance:** High

RECEIVED  
2013 SEP 20 AM 9:00  
IDAHO PUBLIC  
UTILITIES COMMISSION

TWT-T-13-01

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**From:** Diamond, Greg [<mailto:Greg.Diamond@twtelecom.com>]  
**Sent:** Thursday, September 19, 2013 2:58 PM  
**To:** Carolee Hall  
**Subject:** tw telecom request for waiver for City of Boise, ID

Dear Carolee,

tw telecom of Idaho LLC ("tw telecom") respectfully requests that the Idaho Public Utilities Commission ("Commission") grant tw telecom a waiver in order to permit tw telecom to obtain numbering resources in order to satisfy the needs of its customer, the City of Boise, Idaho ("City").

The City has requested that tw telecom provide one 1000 block DIDs for the Boise, ID rate center. The City is seeking numbers within the 802-764-8xxx range. Such numbering resources are urgently needed to accommodate the City's needs within the State of Idaho. A copy of the City's request is provided in Attachment A.

Because Tw telecom does not have the requisite numbering resources to meet the City's request, tw telecom sought additional numbering resources from the numbering pool administrator. That request was denied, however, because tw telecom does not currently meet the MTE and/or number utilization requirements. See Attachment B. Accordingly, the pooling administrator has directed tw telecom to seek a waiver from the Commission.

In its Third Report and Order in the Numbering Resource Optimization proceeding, the Federal Communications Commission stated that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." *Numbering Resource Optimization, Third Report and Order and Second Order on Reconsideration*, CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, (rel. Dec. 28, 2001) ("Third Report and Order") at ¶64. It also stated that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers. *Id.* Therefore, the FCC has specifically authorized the Commission to grant waivers to the pooling administrator's decisions under the appropriate circumstances.

tw telecom respectfully submits that a waiver is appropriate in this instance. In particular, tw telecom has a verifiable need for additional numbering resources because tw telecom cannot meet the City's request out of its existing numbering resources. Furthermore, grant of the requested waiver serves the public interest by allowing tw telecom to expand services to the City in the State of Idaho.

Please let me know if you require anything further or have any questions. Also, could you please provide me with an estimate as to how soon the Commission will act on this waiver request. Thank you.

Greg

Greg Diamond

Vice-President, Regulatory

tw telecom

desk: 206-676-8052

mobile: 303-562-7378

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## IT Department

To provide a better experience for the constituents of the city, the City of Boise requests an additional 1 1000 block of DID's. These additional DID's will help the constituents remember what phone number is to be dialed in case of an emergency or what number is to be dialed to assist them in their everyday life while living in the city. This would assist City of Boise in converting to a new VOIP phone system which has been experiencing an issue of overlapping numbers.

**Garry R. Beaty**  
Chief Information Officer

**Boise City Hall**  
150 N. Capitol Boulevard

**Mailing Address**  
P. O. Box 500  
Boise, Idaho 83701-0500

**Phone**  
208/384-3755

**Fax**  
208/433-5661

**TDD/TTY**  
800/377-3529

**Web**  
[www.cityofboise.org](http://www.cityofboise.org)

**Mayor**  
David H. Bieter

**City Council**  
**President**  
Maryanne Jordan

**Council ProTem**  
Elaine Clegg

Varnon L. Bisterfeldt  
David Eberle  
Alan W. Shealy  
Jim Tibbs

Anthony Ashcraft  
Network Engineer  
City of Boise

Adam Reno  
IT Infrastructure Service Manager  
City of Boise

**From:** [dora.wirth@neustar.biz](mailto:dora.wirth@neustar.biz) [<mailto:dora.wirth@neustar.biz>]

**Sent:** Tuesday, September 17, 2013 10:22 AM

**To:** Pease, Tom; Gonzales, Maria; Musquiz, Josefina

**Cc:** [PA\\_Part3@neustar.biz](mailto:PA_Part3@neustar.biz)

**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 208-BOISE-ID-673934

# Pooling Administration System

Dated 17-September-2013

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 208-BOISE-ID-673934

**Date of Application:** 09/17/2013 **Effective Date:** \_\_\_\_\_

**Date of Receipt:** 09/17/2013 **Date of Response:** 09/17/2013

**Service Provider Name:** TW TELECOM OF IDAHO LLC - ID

(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) **OCN:** 7511

**Parent Company OCN:** 7178

**NPAC SOA SPID :** \_\_\_\_\_

**Pooling Administrator Contact Information:**

**Dora Wirth** \_\_\_\_\_ **Phone:** 925-363-7653

Signature of Pooling Administrator

**Dora Wirth** \_\_\_\_\_ **Fax:** 925-363-7686

Name (print)

Email: [dora.wirth@neustar.biz](mailto:dora.wirth@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): <sup>1</sup> BOIUIDKZDS0  
Rate Center: BOISE  
Rate Center Sub Zone: \_\_\_\_\_

X **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:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

