

## DECISION MEMORANDUM

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

**FROM:** CAROLEE HALL

**DATE:** SEPTEMBER 25, 2013

**RE:** TW TELECOM OF IDAHO LLC ("TW TELECOM").  
PETITION FOR A SAFETY VALVE WAIVER OF FCC THRESHOLD  
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO'S BOISE  
MAIN RATE CENTER; CASE NO. TWT-T-13-01.

### BACKGROUND

On September 20, 2013, the Commission received a Petition for a Safety Valve Waiver of numbering resource guidelines from tw telecom of Idaho LLC ("tw telecom"). The Safety Valve was filed following Neustar's denial of the Company's Application for additional numbering resources in the Boise main rate center. In this Petition, tw telecom explains that on September 17, 2013, it had requested a one-thousands block of numbers in the Boise main rate center. The Company filed its request with Neustar on behalf of a customer in the Boise area seeking DID numbers.

tw telecom'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 Boise rate center exceeds the FCC guidelines.<sup>1</sup> Moreover, tw telecom's customer requested a specific sequential NPA-NXX-X of 208-972-8, which is currently reserved pending the approval of this Safety Valve request.

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<sup>1</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to six months. (FCC 00-104, Section 52.15 (g)(3)(iii)).

## STAFF ANALYSIS

Staff has reviewed the request for the Safety Valve Waiver of the “months to exhaust” threshold requirements and believes it is reasonable for the customer’s business plan.

## RECOMMENDATION

Staff recommends that the Waiver request for the one-thousands block of numbers be granted to tw telecom LLC. Staff recommends that the reserved NPA NXX X (208-972-8) be released to tw telecom for its Boise rate center customer.

## COMMISSION DECISION

Does the Commission agree?



Carolee Hall

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