



August 7, 2014

RECEIVED

2014 AUG -8 AM 10: 06

IDAHO PUBLIC
UTILITIES COMMISSION

VIA ELECTRONIC MAIL

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

RE: Docket No. VZN-T-14-01

Dear Ms. Jewell:

Enclosed for filing are an original and seven (7) copies of the Petition of Frontier Communications Northwest Inc. for Waiver of FCC Threshold Requirements for Numbering Resources for the Sand Point, Idaho rate center.

Frontier Communications Northwest Inc., ("Frontier") requests that the Commission direct NeuStar to release certain numbering resources to Frontier for use to accommodate a large enterprise customer during expansion of its new headquarters.

Frontier is hopeful that the Staff and Commission will be able to review this Petition without delay in order for the Company to expand as soon as possible.

Please contact me at (503) 645-7909 should you have any questions. If Staff has any specific questions about this request, please call Teresa Robinson at 585.777.7572.

Sincerely,

Renee M. Willer
State Regulatory Manager
Frontier Communications

RMW/cag

Enclosures

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

RECEIVED

2014 AUG -8 AM 10: 06

IDAHO PUBLIC
UTILITIES COMMISSION

**PETITION OF FRONTIER
COMMUNICATIONS FOR WAIVER
OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING
RESOURCES FOR SAND POINT
IDAHO**

Case No. VZN-T-14-01

FRONTIER'S REQUEST FOR WAIVER

Frontier Communications Northwest Inc., ("Frontier") submits the following Request for Waiver of certain FCC threshold requirements for the release of numbering resources. Frontier petitions the Commission for review of the denial by the administrator of the North American Numbering Plan, NeuStar, of Frontier's application for use of central office code numbering resources in area code 208.

Specifically, Frontier has requested that NeuStar provide two one-thousand number blocks in the Sand Point rate center. This request is to fulfill a service request for a customer, Litehouse, Inc., and necessary to meet their internal dialing needs as described in the attached customer letter. On August 6, 2014, Frontier submitted a New Code application form. The request was denied due to the months to exhaust (MTE) and/or usage threshold calculation for the Sand Point, ID rate center.

The FCC permits a waiver of the kind requested here when there is a demonstrated need. The waiver process is specifically addressed in the FCC Third Report and Order as the "safety valve" process. See FCC 01-362, ¶¶57-66 (March 14, 2002). The Order

delegates the authority to hear requests for waivers to the state commissioners and recommends that state commissions act expeditiously. See Id., ¶¶ 61,66.

Frontier respectfully requests that the Commission approve this Request for Waiver of the threshold requirements and direct NeuStar to issue two new thousand number blocks from the Sand Point rate center. Attached with this petition is the current utilization report for the Sand Point rate center as well as the rejection notice from NeuStar.

Submitted this 7th day of August 2014.



Renee M. Willer
State Regulatory Manager
Frontier Communications
20575 NW Von Neumann Dr.
Beaverton, OR 97006
renee.willer@ftr.com

Robinson, Teresa M (Rochester)

From: john.auerbach@neustar.biz
Sent: Wednesday, August 06, 2014 7:47 AM
To: Robinson, Teresa M (Rochester)
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 208-SANDPOINT-ID-748781

Pooling Administration System

Dated 06-August-2014

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 208-SANDPOINT-ID-748781

Date of Application: 08/06/2014 Effective Date: _____
Date of Receipt: 08/06/2014 Date of Response: 08/06/2014

Service Provider Name: FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID
(Telcordia TM LERG TM Routing Guide) OCN: 4321
Parent Company OCN: 3400

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:

Rate Center Sub Zone:

SNPNIDXXCG0

SANDPOINT

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:

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 (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)



TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 208-SANDPOINT-
ID-748781
Individual Block
Request

Type of Application: New Change Disconnect
i

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID
Headquarters Address: 180 S. Clinton Avenue
City, State, Zip: Rochester, NY, 14646
Contact Name: Teresa Robinson
Contact Address: 180 S. Clinton Avenue
City,State,Zip: Rochester , NY , 14646
Phone: 585-777-7572 FAX: 585-777-1177 E-mail: teresa.m.robinson@ftr.com

Pooling Administrator: ii

Contact Name: John Auerbach
Contact Address: 1800 Sutter St. Ste. 780
City,State,Zip: Concord ,CA,94520
Phone: 925-363-8706 FAX: 925-363-7684
E-mail: john.auerbach@neustar.biz

1.2 General Information:

Check one : No LRN needed X LRN needed iii

NPA: 208 LATA: 960 OCN: iv Parent Company's OCN 3400
 4321

Number of Thousands-Blocks Requested : 2

Switching Identification(Switch Entity/POI) : ^v

SNPNIDXXCG0

City or Wire Center Name : _____

Rate Center: ^{vi}

SANDPOINT

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 08/06/2014

Requested Block Effective Date: ^{viii}

08/25/2014

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) 208-920-2x and 208-928-4x
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any all others
- 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 _____ 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 _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks: **We are our own AOCN and can modify BIRRDS on 1-7 days notice.**

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.

Teresa Robinson

Signature of Block Applicant

Sr.
Network
Engineer - 08/06/2014
Number
Planning

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 Telcordia™ 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 Telcordia™ 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 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.

Foot Notes :

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 network 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} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

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

Tracking Number: **208-SANDPOINT-ID-748781**

Date: **08/06/2014** OCN:**4321** Company Name:**FRONTIER COMMUNICATIONS
NORTHWEST, INC. - ID**

Rate Center: **SANDPOINT**

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

Name of Block Applicant:**Teresa Robinson** Signature: **Teresa Robinson**

Title:**Sr. Network Engineer - Number Planning** Telephone No.: **585-777-7572**
FAX No.: **585-777-1177**

E-mail: **teresa.m.robinson@ftr.com**

A. Available Numbers:**8066**

B. Assigned Numbers: **17508**

C. Total Numbering Resources:**30000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²:**225**

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	<u>22</u>	<u>35</u>	<u>62</u>	<u>34</u>	<u>31</u>	<u>41</u>
--------------------------------------	------------------	------------------	------------------	------------------	------------------	------------------

months³

F. Forecast

- Next 12 400 100 100 100 100 100 100 100 100 100 100 100

months⁴

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):150.0

H. Months to Exhaust⁵

Numbers Available for Assignment to Customers(A)

=

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	8066	53.773
2	9066	60.44

I.

Utilization⁶ $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$

=

58.801

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.

²Quantity 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).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

November 21, 2003
ATIS-0300066.at3

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TBPAG Part 3

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(Telcordia™ LERG™
Routing Guide) OCN: 4321
Parent Company OCN: 3400

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 SNPNIDXXCG0

Rate Center: SANDPOINT

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:

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 (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

November 21, 2003
ATIS-0300066.at3

Attachment 3

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(Telcordia™ LERG™
Routing Guide) OCN: 4321
Parent Company OCN: 3400

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 SNPNIDXXCG0

Rate Center: SANDPOINT

Rate Center Sub Zone: _____

X Form Complete, request denied.

Explanation:

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_____ **Request withdrawn.**

Explanation:

_____ **Assignment activity suspended by the administrator.**

Explanation:

Remarks:

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August 5, 2014

Litehouse, Inc
1109 N Ella
Sandpoint, ID 83864

To whom it may concern,

I am writing to request a specific range of DIDs for our new PRI installation. We would like to get a block of 300 contiguous DID numbers for our new HQ location resembling 208-XXX-1XXX, or 208-XXX-2XXX, or 208-XXX-3XXX. This range will be used to map out our internal extensions and allow us to configure our new phone system to pair our DIDs and extensions. In addition to this, I would like to also request 100 contiguous DID numbers for our Ella facility for the same purposes, but it cannot start with the same number as the above request. If the last four digits of the 300 DIDs for HQ begins with "1", I would need the 100 DID numbers for Ella to begin with "2" or "3" so we can route our internal calls accordingly between sites.

For example:

HQ = 208-XXX-1100 through 208-XXX-1399.

Ella = 208-XXX-2100 through 208-XXX-2199.

We would appreciate you considering us to obtain these numbering resources and establish a relationship with Frontier Communications.

Very Respectfully,

Lyle Beck
Technology Manager
208-265-7726
lbeck@litehouseinc.com

PROUD TO BE EMPLOYEE OWNED

1109 North Ella Sandpoint, Idaho 83864 (208) 263-7569 Fax (208) 263-7821 www.litehousefoods.com