

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)
FRONTIER COMMUNICATIONS) **CASE NO. VZN-T-14-01**
NORTHWEST INC. SEEKING A WAIVER)
OF FCC THRESHOLD NUMBERING)
RESOURCE REQUIREMENTS FOR)
SANDPOINT, IDAHO) **ORDER NO. 33105**
)

On August 8, 2014, Frontier Communications Northwest Inc. (“Frontier”) petitioned the Public Utilities Commission for a waiver of numbering resource guidelines, and appealed the denial of its application for additional numbering resources by Neustar, the North American Numbering Plan Administrator. Frontier operates as the incumbent local exchange carrier in its northern Idaho service area after acquiring Verizon Northwest’s local exchanges in July 2010. Order No. 32142. As outlined below, the Commission grants Frontier’s Petition.

THE PETITION

Frontier customer Litehouse Inc. requested a block of 300 contiguous direct inward dialing (DID)¹ numbers to accommodate a new headquarters facility in Sandpoint, Idaho, and to permit internal dialing by using the last four digits of each number. Litehouse also requested a block of 100 contiguous DID numbers for its Ella Street facility. To allow use of internal extensions between the headquarters and Ella facilities, Litehouse asked that the first digit of the Ella extensions differ from the corresponding digit of the headquarters extensions.²

On August 6, 2014, Frontier applied to Neustar for release of two one-thousand number blocks of telephone numbers for Litehouse. As part of its Application, Frontier submitted a “Months to Exhaust” (MTE) worksheet, indicating when Frontier would deplete or exhaust its telephone numbering resources in the Sandpoint rate center. Frontier calculated that it would be more than 53 months before it would run out of available telephone numbers in each of the two requested blocks. This exceeds the maximum MTE required by Federal Communications Commission (FCC) guidelines, in order to be assigned an additional thousands-

¹ DID is a feature of a PBX or Centrex telephone system that allows a caller to directly dial an internal telephone number.

² For example, if headquarters numbers are 208-XXX-1100 through 208-XXX-1399, the Ella facility could have numbers 208-XXX-2100 through 208-XXX-2199. This way, the extensions – or last four digits – at headquarters would not duplicate extensions at the Ella facility.

block of numbers for growth.³ Accordingly, Neustar denied Frontier’s application on the day it was submitted.

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.” See Petition at 1. *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*”). Frontier filed a Petition under this process and now asks that the Idaho Commission approve its request for waiver and direct Neustar to release two thousand-number blocks from the Sandpoint rate center. The blocks 208-920-2XXX and 208-920-4XXX are currently reserved pending approval of Frontier’s request, but are set to be released on Friday, August 22, 2014.

STAFF ANALYSIS

Staff recommended the Commission grant Frontier’s Petition. Staff believes that the “safety valve” criteria has been met because Frontier cannot meet Litehouse’s request with its current numbering inventory. Staff has reviewed and evaluated Frontier’s request as well as the letter from Litehouse and believes the waiver is reasonable for Litehouse’s business plan.

DISCUSSION AND FINDINGS

After considering Frontier’s Petition and reviewing Neustar’s initial decision, the Commission finds that Frontier’s Petition should be granted. The FCC grants the Idaho Commission the authority to overturn a denial by Neustar for a numbering assignment “based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.” 47 C.F.R. § 52.15(g)(4). We find that Frontier’s current numbering inventory is insufficient to meet the specific customer’s service request. *Optimization Order*, ¶ 61, *Errata*, ¶ 18. The requested block will be used to fulfill reasonably expected and specifically identified customer requirements. We further find that the assignment will not detrimentally affect number resources for the Sandpoint rate center, and that it is reasonable to direct that Neustar provide the number blocks as requested by Frontier to meet the customer’s need.

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

ORDER

IT IS HEREBY ORDERED that Frontier's Petition for a "safety valve" waiver of the FCC's numbering resource optimization guidelines is granted.

IT IS FURTHER ORDERED that the reserved number blocks NPA NXX X (208-920-2XXX and 208-920-4XXX) be released to Frontier for its Sandpoint rate center customer.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *Idaho Code* § 61-626.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 21st day of August 2014.



PAUL KJELLANDER, PRESIDENT

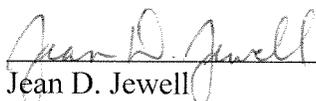


MACK A. REDFORD, COMMISSIONER



MARSHA H. SMITH, COMMISSIONER

ATTEST:



Jean D. Jewell
Commission Secretary

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