

## DECISION MEMORANDUM

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

**FROM: CAROLEE HALL**

**DATE: AUGUST 12, 2014**

**RE: FRONTIER COMMUNICATIONS NORTHWEST INC., (“FRONTIER”)  
PETITION FOR A SAFETY VALVE WAIVER OF FCC THRESHOLD  
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO’S  
SANDPOINT RATE CENTER; CASE NO. VZN-T-14-01.**

### BACKGROUND

On August 8, 2014, the Commission received a Petition for a Safety Valve Waiver of numbering resource guidelines from Frontier Communications Northwest Inc., (“Frontier”). The Safety Valve was filed following Neustar’s denial of the Company’s Application for additional numbering resources in the Sandpoint rate center. In this Petition, Frontier explains that on August 6, 2014, it had requested two one-thousand number blocks of numbers. The Company filed its request with Neustar on behalf of a customer in the Sandpoint area seeking DID numbers.

Neustar denied Frontier’s Application due to the “Months to Exhaust” (MTE) calculation for the rate center. According to the report, the MTE for the Sandpoint rate center exceeds the FCC guidelines.<sup>1</sup> Moreover, Frontier’s customer requested specific sequential NPA-NXX-X of 208-920-2XXX and 208-920-4XXX, which are 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

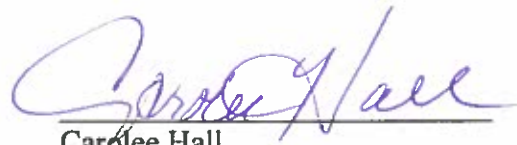
Staff has reviewed the request for the Safety Valve Waiver of the “months to exhaust” threshold requirements and believes it is reasonable for the customer’s business plan.

## RECOMMENDATION

Staff recommends that the Waiver request for the two one-thousand blocks of numbers be granted. Staff recommends that the reserved NPA NXX X (208-920-2XXX and 208-920-4XXX) numbers be released to Frontier for its Sandpoint rate center customer.

## COMMISSION DECISION

Does the Commission agree?



Carolee Hall

[u/chall/decision memo/numbering/Frontier Communications Northwest, Inc., Safety Valve Request VZN-T-14-01](#)