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TO: PUBLIC SERVICE COMMISSION

FROM: DIVISION OF PUBLIC UTILITIES

Chris Parker, Director
Bill Duncan, Manager, Telecommunications and Water
Paul M. Anderson, Utility Technical Consultant

RE: Request for numbering waiver by Qwest Corporation dba CenturyLink QC (CenturyLink) of the FCC's threshold requirements for a location served by LEHIUTMADSO within the Lehi Rate Center. Docket No. 16-049-01

RECOMMENDATION: Approve Waiver

The Division recommends that the Commission approve Century Link's request for a waiver of threshold requirements and direct PA/NeuStar, the Numbering Plan Administrator (NPA), to provide the requested one block of 1,000 sequential numbers (1,000 numbers) to accommodate a request for a CenturyLink customer in the Utah 801 NPA Lehi Rate Center.

BACKGROUND:

On January 13, CenturyLink requested a waiver by the Commission of the FCC's threshold requirements and in order to qualify for the additional numbering resources has submitted paperwork demonstrating that the rate center for which the numbers are requested is at or less than six Month-To-exhaust (MTE) and is at 75% or more utilization. CenturyLink had previously submitted a request for the numbers to PA/NeuStar which was immediately denied on January 8, 2016, based on Century Link's Months to Exhaust (MTE) and/or Utilization threshold for new numbering requests. The FCC has affirmed that in instances where a carrier has neither the inventory to satisfy a specific customer request, nor the utilization for obtaining more numbers, the State Commission may grant relief to carriers with a

“verifiable need due to the carrier’s inability to satisfy a specific customer request.”¹

This inability has been demonstrated by the carrier providing “documentation of the customer request and current proof of utilization in the rate center.”

CenturyLink has provided documentation indicating that its customer is requesting 1,000 telephone numbers in the 801 NPA, Lehi Rate Center, which it cannot provide based on its current inventory.

ANALYSIS:

The Division of Public Utilities has reviewed the documentation filed by CenturyLink and recommends that the Commission approve the requested waiver. The customer is requesting 1,000 telephone numbers from 801 NPA. These telephone numbers are required for future/planned growth. The issuance of this number block will not significantly affect the available number pool in the 801 NPA, nor will it affect the exhaust date of the 801 NPA.

¹ *In the Matter of Numbering Resource Optimization Implementation of the Local Competition Provision of the Telecommunications Act of 1996 Telephone Number Portability, Report and Order & 2nd order on Reconsideration in CC Docket No. 96-98 & in Docket No. 99-200, Fcc oI-362, 3rd Report & Order ¶61 (2001)*