



State of Utah
Department of Commerce
Division of Public Utilities

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-== MEMORANDUM ==-

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Bill Duncan, Telecommunications / Water Manager
Casey J. Coleman, Utility Technical Consultant

Date: December 24, 2018

Re: In the Matter of Qwest Corporation, dba CenturyLink QC's Request for a Numbering Waiver, per Docket No. 18-049-13.

RECOMMENDATION: Approve Waiver

The Division recommends that the Commission approve Qwest Corporation dba CenturyLink QC's ("CenturyLink") request for a waiver of threshold requirements and direct Neustar, the Numbering Plan Administrator (PA), to provide the requested blocks of 1,000 sequential numbers in the Utah 801 NPA Lehi Rate Center.

BACKGROUND:

On December 19, 2018, CenturyLink requested a waiver of the threshold requirements based on the Federal Communications Commission ("FCC") Rules found at 47 C. F.R. § 52.15(g)(4) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC"). CenturyLink previously submitted a request for the numbers to the PA, which was immediately denied because CenturyLink does not meet the utilization requirements and the Months to Exhaust (MTE) 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 can be demonstrated to the State Commission by the carrier providing “documentation of the customer request and current proof of utilization in the rate center.”²

REQUEST:

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 customer is requesting 1,000 telephone numbers from the 801 NPA. These telephone numbers are required to service a specific customer of CenturyLink. Without the waiver from the Commission, CenturyLink will be unable to meet the needs of its customer. The issuance of these number blocks will not significantly affect the available number pool in the 801 NPA, nor will it affect the exhaust date of the 801 NPA.

Because of this the Division recommends the Commission grant the waiver and direct the PA/Neustar to assign the requested 1,000 block of sequential numbers within the 801 NPA, and any block in any available NXX, with the exception of block 0,1, or 9. These numbers will be assigned to the LEHI rate center and will be used in the LEHIUTMADS0 switch.

cc: Justin Jetter, Assistant Attorney General
Rita Schmitz, CenturyLink
Torry Somers, CenturyLink
Margaret Harrell-Simington, Neustar

¹ *In the Matter of Numbering Resource Optimization Implementation of the Local Competition Provision of the Telecommunications Act of 1996 Telephone Number Portability, 3rd Report and Order & 2nd order on Reconsideration in CC Docket No. 96-98 & in Docket No. 99-200, Fcc 01-362, 3rd Report & Order ¶61 (2001)*

² ID., at ¶64.