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April 24, 2018

Via Fed Ex

Mr. Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

***Re: MCImetro Access Transmission Services Corp.'s Request for
Numbering Waiver***

Dear Mr. Widerburg:

MCImetro Access Transmission Services Corp. d/b/a Verizon Access

Transmission Services ("MCImetro"¹) respectfully requests a waiver to obtain the contiguous numbering resources required to meet a specific customer request at a location served by the SLKCUT24DS1 switch within the Clearfield rate center. If granted, the waiver will allow the Pooling Administrator ("PA")/Neustar, the Number Pool Administrator, to provide three contiguous thousand number blocks in the 801

¹ MCImetro was formerly known as MCImetro Access Transmission Services LLC. The Commission formally acknowledged its new name and amended its certificate of public convenience and necessity to reflect the new name in a December 21, 2016 order in Docket Nos. 16-095-01 and 96-095-02.

NPA to be assigned to the SLKCUT24DS1 switch within the Clearfield rate center in order to meet this specific customer request.

In a confidential letter (**Confidential Attachment A** hereto), the customer is requesting 3,000 contiguous numbers in the 801 NPA in any NXX in the range of XXX-7000 to XXX-9999. The customer's request for the contiguous numbers results from the need to align with the customer's existing private dialing plan, and to accommodate the customer's migration to a new communications platform.

According to FCC requirements (47 C.F.R. § 52.15(g)), to qualify for additional numbering resources, a service provider must submit paperwork demonstrating that the rate center for which the numbers are requested is at, or at less than, six Months-to-Exhaust ("MTE") and at 75% or more utilization. In cases where a service provider is not able to meet a specific customer request with available inventory, the FCC has determined that state utility commissions have jurisdiction to grant a waiver pursuant to FCC 01-362 (December 28, 2001), Section IV, ¶¶ 57-66. In ¶ 66 thereof, the FCC recommends that the state utility commission respond within 10 business days of a waiver request.

To satisfy the customer request, MCImetro submitted a request for numbers and supporting documents to the PA/Neustar (**Attachment B²** and **Confidential Attachment C³** hereto). The PA/Neustar denied the request on April 20, 2018 because MCImetro does not meet the utilization and MTE requirements (**Attachment D** hereto). In order for the request to be approved, MCImetro needs a waiver approval by the Utah Public Service Commission ("UT PSC") to override the PA/Neustar's denial of requested numbering resources.

MCImetro respectfully requests that the UT PSC approve this request for waiver and direct the PA/Neustar to make the necessary assignment of numbering resources so that MCImetro can meet its customer's request – specifically, by directing the PA/Neustar to provide three contiguous thousand number blocks in the 801 NPA that can accommodate the range of XXX-7000 to XXX-9999, to be assigned to the SLKCUT24DS1 switch within the Clearfield rate center.

The directive can be e-mailed or faxed to:

Margaret Harrell-Simington
Pooling Administrator
Neustar, Inc.
E-Mail: margaret.harrell-simington@neustar.biz
Fax: 925.363.8747

² Attachment B is MCImetro's Thousands-Block Application Form – Part 1A for the subject request, dated April 20, 2018.

³ Confidential Attachment C is MCImetro's MTE and Utilization Report for the subject request, dated April 19, 2018.

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Thank you for your handling of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Deborah Kuhn", with a stylized flourish at the end.

Deborah Kuhn

Attachments

CONFIDENTIAL ATTACHMENT A

ATTACHMENT B

Tracking Number: 801-CLEARFIELD-UT-1088651

**Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**

Individual Block
Request

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC - UT
Headquarters Address: 140 West St
City: New York State: NY ZIP: 10013
Contact Name: Andy Knapp
Contact Address: 2700 Summit Dr
City: Plano State: TX ZIP: 10013
Phone: 972-578-3759 Fax:
E-mail: andy.w.knapp@verizon.com

Pooling Administrator:ⁱⁱ

Contact Name: Margaret Harrell-Simington
Contact Address: 1800 Sutter Street, Suite 780
City: Concord State: CA ZIP: 94520
Phone: 925-363-8747 Fax: 925-363-8747
E-mail: margaret.harrell-simington@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 801 LATA: 660 OCN^{iv}: 7784 Parent Company's OCN 7229

Number of Thousands-Blocks Requested : 3
Switch Identification (Switching Entity/POI^v): SLKCUT24DS1
Rate Center^{vi}: CLEARFIELD

1.3 Dates:

Date of Application^{vii}: 04/20/2018 Requested Effective Date^{viii}: 05/21/2018

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 385-367-7,8,9
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
- 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^x 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:

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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>Andy Knapp</u>	<u>Code Admin</u>	<u>04/20/2018</u>
Signature of Block Applicant	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 Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv™ Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ 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 PSTN 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} Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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CONFIDENTIAL ATTACHMENT C

ATTACHMENT D

From: margaret.harrell-simington@neustar.biz
To: [Code Administrators; Knapp, Andy W](#)
Cc: PA_Part3@neustar.biz
Subject: [E], 801-CLEARFIELD-UT-1088651 - DENIED PAS - Part 3 Confirmation
Date: Friday, April 20, 2018 4:31:21 PM

Pooling Administration System

Dated 20 April 2018

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 801-
CLEARFIELD-UT-
1088651

Date of Application: 04/20/2018 Effective Date: _____
Date of Receipt: 04/20/2018 Date of Response: 04/20/2018

Service Provider Name: MCIMETRO ACCESS TRANSMISSION SERVICES
LLC - UT

(LERGTM Routing Guide¹) OCN: 7784

Parent Company OCN: 7229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-363-8747
Signature of Pooling Administrator
Margaret Harrell-Simington Fax: 925-363-8747
Name (print)
Email: margaret.harrell-simington@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 (1-
1000): _____
Switch Identification
(Switching/POI)²: **SLKCUT24DS1**
Rate Center: **CLEARFIELD**

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 Administrator.

Explanation:

Remarks:

¹ Telcordia[®] is a registered trademark and LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language[®] Location Code (CLLI[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLLI is

a trademark and the Intellectual Property of Telcordia Technologies, Inc.
dba iconectiv.

