



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: May 3, 2018

Re: In the Matter of MCI metro Access Transmission Services Corp. d/b/a/ Verizon Access Transmission Services' Request for a Numbering Waiver within the Clearfield Rate Center, per Docket No. 18-2245-01.

RECOMMENDATION: Approve Waiver

The Division recommends that the Commission approve of MCI metro Access Transmission Services Corp. d/b/a/ Verizon Access Transmission Services' ("MCI metro") request for a waiver of threshold requirements and direct Neustar, the Numbering Plan Administrator (PA), to provide a requested blocks of 3,000 sequential numbers in the Utah 801 NPA Clearfield Rate Center.

BACKGROUND:

On April 24, 2018, MCI metro 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"). MCI metro previously submitted a request for the numbers to the PA, which was immediately denied because MCI metro 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:

MCImetro has provided documentation indicating that its customer is requesting 3,000 telephone numbers in the 801 NPA, Clearfield Rate Center, which it cannot provide based on its current inventory.

ANALYSIS:

The customer is requesting 3,000 telephone numbers from 801 NPA, Clearfield Rate Center. These telephone numbers are required to service a specific customer of MCImetro. Without the waiver from the Commission, MCImetro 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, Clearfield Rate Center, nor will it affect the exhaust date of the 801 NPA, Clearfield Rate Center. Because of this the Division recommends the Commission grant the waiver.

cc: Justin Jetter, Assistant Attorney General
Margaret Harrell-Simington, Neustar
Debra Kuhn, MCImetro Transmission Services

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.