



State of Utah
Department of Commerce
Division of Public Utilities

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Deputy Director

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Director, Division of Public Utilities

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March 22, 2012

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: Waiver Request of the threshold requirements outlined in FCC's Numbering Resource Optimization Orders, Utah Docket No 12-041-01 for Frontier Communications' Navajo Communications Company, Inc. (Navajo) at its Monument Valley exchange.

RECOMMENDATION: Approve Waiver

The Division recommends that the Commission approve Navajo's request for a waiver of threshold requirements and direct PA/NeuStar, the Numbering Plan Administrator (NPA), to provide the requested ten thousand block to accommodate a VoIP switch installation in the Utah 435 Monument Valley Rate Center.

BACKGROUND:

On March 5, 2012, Frontier Communications requested a waiver of the threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200 for Navajo. Navajo had previously submitted a request for the NXX to PA/NeuStar which was immediately denied based on Navajo's Months to Exhaust (MTE) and Utilization threshold for new numbering requests.

The FCC allows for a waiver of the rules when there is demonstrated need. In this case, in order to establish a new LRN (local routing number) for its new switch so that numbers can be ported to it, Navajo initially requires an "A" block or ten thousand block

of numbers to establish a new prefix. The existing Monument Valley switch will remain in place.

ANALYSIS:

Monument Valley is a large geographic rate center with a small number of telephone customers. Even if the new switch covers the other two exchanges in the Navajo serving area which are very similar rural exchanges, 10,000 numbers of capacity being tied up for this one small exchange is overkill. Therefore, after switch set up and installation, Navajo will return nine one thousand number groups to the numbering pool.

CC: Renee Willer, Frontier Communications
Rosemary Coates, Frontier Communications