



March 5, 2012

Julie Orchard
Secretary
Public Service Commission of Utah
160 East 300 South, 4th Floor
Sale Lake City, Utah 84111

Dear Ms. Orchard:

By this letter Citizen's Telecommunications Company of Utah (d/b/a Frontier Communications of Utah) is requesting 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, which would allow NeuStar, the Number Pooling Administrator, to provide a ten thousand block to establish a new LRN for the Meta VoIP switch in LATA 981.

Frontier is requesting an "A" block so that we can establish an LRN for the Monument Valley, UT Rate Center in LATA 981. The Company is currently at 8% utilization for this Rate Center assigned to ILEC OCN 4451. Frontier has installed a Meta Switch to offer VoIP services to our existing or new customers in this LATA to be provided by the ILEC, Citizen's Telecommunications Company of Utah.

Frontier will continue to use the existing NPA NXX records for all Rate Centers in LATA 981 for future phone number assignments and will port to the Meta VoIP Switch if a customer requests this service. In order to offer this new service in LATA 981, the company needs to establish a new LRN for the VoIP switch.

The FCC allows for a waiver of the rules when there is demonstrated need. Frontier is ready to provide new VoIP services to Utah customers and requires an "A" record block in Monument Valley, UT to establish the LRN for the new Meta VoIP switch. Frontier will return the remaining blocks to Pooling.

Frontier respectfully requests that the Commission approve the request for a waiver of Months to Exhaust threshold and Utilization requirements and direct NeuStar to grant the request for a ten thousand number block in the Utah Monument Valley Rate Center. Attachments are enclosed that support this filing.

Sincerely,

A handwritten signature in black ink that reads "Renee M. Willer". The signature is written in a cursive, flowing style.

Renee Willer
Frontier Communications
(503) 645-7909