

# STATE OF NEW HAMPSHIRE

Inter-Department Communication

**DATE:** December 23, 2014

**AT (OFFICE):** NHPUC

NHPLC 28DEC14PM4:28

**ML**  
**FROM:** Michael Ladam, Assistant Director of Telecommunications  
**SUBJECT:** DT 14-345, Comcast Request for Waiver of Neustar Denial of Numbering Resources  
**TO:** Commissioners  
Debra Howland, Executive Director  
Kate Bailey, Director, Telecommunications

## **Executive Summary:**

Comcast Phone of New Hampshire (Comcast) has asked the Commission to overturn Neustar's denial of multiple blocks of telephone numbers needed to meet the specific requirements of a single large customer. Staff has identified a process for making sufficient blocks available to meet Comcast's request, within approximately two months, consistent with the policy objective of number conservation in the state. Until this potential remedy is exhausted, Staff recommends deferring action on Comcast's request.

## **Background:**

On December 2<sup>nd</sup>, 2014, Comcast submitted a petition seeking a waiver of Neustar's decision to deny Comcast's request for multiple blocks of telephone numbers in a particular rate center. Comcast asserted that it is unable to meet the needs of its customer without obtaining the requested blocks.

Neustar administers telephone number assignments on behalf of the North American Numbering Plan Administrator. Neustar denied the request because Comcast has not met the Months to Exhaust or utilization requirements in that rate center: that is, its demand history does not support allocating so many numbers to Comcast at this time under normal processes.

Under 47 C.F.R. §52.15(g)(4), a state commission "may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies."

Staff has examined the pool of numbers allocated to the rate center in question. There are not enough blocks currently in the rate center to meet Comcast's request. Thus, overturning the NANPA decision at this time would require allocating a new 10,000 number "code" to the rate center. Even the numbers in that code unused by Comcast

would then be locked into that rate center and unavailable for use in other areas, and the pool of unassigned codes would shrink.

Under New Hampshire RSA 374:59, II, the Commission is required to “adopt telephone number conservation measures to the maximum extent allowed by federal law.” This leads Staff to look for reasonable alternatives before considering allocation of a new code.

Staff has identified blocks currently assigned to another carrier which are sufficient to meet Comcast’s request, and that carrier has begun the process of returning these blocks to NANPA, from which they can be made available to Comcast. That process is expected to take approximately 65 days.

In Staff’s assessment, this is an example of an “other available remedy” that must be explored before the Commission overturns the Neustar denial. We recommend that the Commission defer action on Comcast’s request until these new numbers become available, which is expected to occur within approximately 65 days.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:  
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
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