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STATE OF NEW HAMPSHIRE

Inter-Department Communication

**CONFIDENTIAL
MATERIAL
IN COMM FILE**

DATE: April 25, 2014
AT (OFFICE): NHPUC

FROM: *David*
David Goyette, Utility Analyst III - Telecommunications

SUBJECT: DT 14-110 FairPoint Communications - NNE
Request for Waiver of NeuStar's Denial of Numbering Resources

TO: Commissioners
Debra Howland, Executive Director

NHPUC 25APR'14pm12:57

Executive Summary

Staff recommends the Commission grant FairPoint's request for waiver of Neustar's denial of numbering resources in [REDACTED] because the request can be fulfilled without jeopardizing available numbering resources in the rate center.

Background and Analysis

On April 23, 2014, Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE (FairPoint) submitted a petition seeking a waiver of NeuStar's decision to deny FairPoint's request for one block of numbers containing one thousand telephone numbers. NeuStar is the division of the North American Numbering Plan Administrator (NANPA) that administers number assignments.

In its cover letter FairPoint requested certain information be kept confidential.

FairPoint stated the numbers are needed to fulfill a customer's request for [REDACTED], to support the service delivery of a Primary Rate Interface (PRI), and to accommodate the customer's growth.

NeuStar's Pooling Administrator denied FairPoint's request on the grounds that FairPoint had not met the "MTE [months-to-exhaust] and or Utilization requirements" for the rate center in which it made its request. FairPoint states it requested the block because it does not have the resources available to meet its customer's request.

The FCC's Numbering Resource Optimization Third Report and Order and Second Order on Reconsideration (FCC 0 1-362) Appendix A, Final Rules, 52. 15(g) (4) states that " ... The state commission also 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 remedies."

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FairPoint supported its petition with a letter from its customer. The customer states that it requires [REDACTED] sequential [REDACTED] for the primary rate interfaces it uses. Based on information provided to Staff, FairPoint and its customer have demonstrated a verifiable need for the numbers.

Ten blocks of numbers are available in the rate center in which the customer seeks resources. Numbering resources are available in the customer's exchange to fulfill the request. A new code will not be used to satisfy this request and, if the Commission approves the request for a waiver of the denial so that a block can be assigned to FairPoint, nine blocks will remain available in the pool. Based on this, Staff recommends the Commission grant a waiver of NeuStar's denial of FairPoint's request for a single block of numbers in the [REDACTED] exchange.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

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;

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.

c) Serve a written copy on each person on the service list not able to receive electronic mail.