

Theresa L. O'Brien
Vice President – Regulatory Affairs



234 Washington Street
Providence, RI 02903

Phone 401 525-3060
Fax 401 525-3064
theresa.obrien@verizon.com

April 26, 2006

Ms. Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Request for Waiver of NANPA's Denial of Verizon Rhode Island's Request for 2500 Numbers to Serve East Greenwich Customer

Dear Ms. Massaro:

The purpose of this letter is to seek a waiver of NANPA's (*i.e.*, NeuStar) decision to deny Verizon Rhode Island's ("Verizon RI") request for 2500 numbers to permit Verizon RI to offer service to Brooks Pharmacy ("Customer"). In submitting this waiver request to the Rhode Island Public Utilities Commission ("Commission"), Verizon RI notes that when NeuStar denies the release of a necessary block of numbers, a carrier may appeal to the Commission for relief. Because the Customer is anxious to receive these numbers, we respectfully request that the Commission address this waiver request as soon as practicable.

I. NATURE OF NUMBERING REQUEST

Brooks Pharmacy, a Verizon RI customer located at 1400 Division Road, East Greenwich, requested 2500 telephone numbers specifically in the East Greenwich CO in order to provide integrated dialing at a new facility to support the growth of the organization. As such, Brooks Pharmacy is in need of 2500 consecutive numbers. Verizon RI currently does not have 2500 consecutive numbers in its inventory for the East Greenwich exchange. Due to Brooks' dialing pattern, two of the thousand blocks must be consecutive and must begin in 2 and 3. The remaining 500 must be consecutive in a sequential block. Brooks' request for these consecutive numbers is so that its telecommunications systems will be compatible with its existing dialing patterns while they plan for expansion and new PBX systems. A new exchange will need to be assigned for the new numbers, which need to be consecutive for this and for administration purposes.

On April 18, 2006, Verizon RI submitted a Central Office Code (NXX) Assignment Request (a "Part 1A" form) to NeuStar, requesting a new NXX to meet Brooks' needs. The Company explained that it did not have the needed numbers available in its existing inventory in the East Greenwich rate center. On April 19, 2006, NeuStar's Central Office Code Administrator denied the Company's request on the grounds that Verizon RI had not met the rate center-based months to exhaust ("MTE") criteria, as set forth by the FCC. This denial was based entirely upon not meeting the MTE requirements -- notwithstanding the fact that Verizon RI does not have the specific numbering resources needed to satisfy this specific customer's request. A copy of the e-mail decision denying Verizon RI a new NXX code is attached as Exhibit A.

II. REQUEST FOR WAIVER OF NANPA'S NXX CODE DENIAL

By way of this letter, Verizon RI requests that the Commission overturn NeuStar's decision and order that 2500 consecutive telephone numbers be assigned to Verizon RI's East Greenwich central office switch to permit Verizon RI to serve Brooks Pharmacy. The Commission has the authority to take such action pursuant to the FCC's Numbering Resource Optimization ("NRO") *Third Report and Order and Second Order on Reconsideration* (FCC 01-362), released December 28, 2001, in CC Docket No. 96-98 and CC Docket No. 99-200 ("*Third NRO Order*").

Further, the Commission has determined that a carrier may be granted a waiver from NeuStar's decision when a Carrier has a utilization rate over 50%.¹ Verizon RI's current utilization rate in the East Greenwich exchange is 66.89%. The customer will be using approximately 83% of the three thousand number blocks, and Verizon RI intends to return the unused number blocks to the Pooling Administrator to preserve the numbering resource.

Because Verizon RI meets the standards set forth in the Commission's past decisions, Verizon RI respectfully requests this waiver from the Pooling Administrator's denial of Verizon RI's Request for Number Block Release. Granting this waiver will result in the release of 2500 numbers for immediate use so that the Company can continue to serve Brooks Pharmacy.

Thank you for your assistance in this matter. Please contact me at 401-525-3060 if you have any questions concerning this request.

Sincerely,

Theresa L. O'Brien

Enclosure

cc: Steve Frias, Commission Counsel

¹ See In Re: Cox Rhode Island Telcom L.L.C. Waiver Request for Number Block Release – Toray Plastics of America, Docket No. 3567

EXHIBIT A

