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March 16, 2007

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

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COMMUNICATIONS

Re: Request for Waiver of NANPA's Denial of Verizon Rhode Island's Request for 2000 Numbers to Serve West 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 2000 numbers to permit Verizon RI to offer service to Amgen ("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

Amgen, a Verizon RI customer located at 40 Technology Way, West Greenwich, requested 2000 telephone numbers specifically in the Coventry CO in order to provide integrated dialing at an existing facility to support the growth of the organization. As such, Amgen is in need of 2000 consecutive numbers. Verizon RI currently does not have 2000 consecutive numbers in its inventory for the Coventry exchange. Due to Amgen's dialing pattern, the thousand blocks must be consecutive and must begin in 8 and 9 in the 412 exchange. Amgen's 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 continuing growth.

On March 6, 2007, Verizon RI submitted a Central Office Code (NXX) Assignment Request (a "Part 1A" form) to NeuStar, requesting the specific blocks to meet Amgen's needs.

The Company explained that it did not have the needed numbers available in its existing inventory in the Coventry rate center. On March 13, 2007, 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

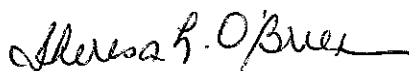
By way of this letter, Verizon RI requests that the Commission overturn NeuStar's decision and order that 2000 consecutive telephone numbers be assigned to Verizon RI's Coventry central office switch to permit Verizon RI to serve Amgen. The Commission has the authority to take such action pursuant to 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 Coventry exchange is 79.7%.

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 2000 numbers for immediate use so that the Company can continue to serve Amgen.

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

Pooling Administration System - Microsoft Internet Explorer provided by Verizon

File Edit View Favorites Tools Help

Address <https://www.nelcnapooling.com/pas/frames-index.jsp>

Links [Web Home](#) [Imported bookmarks](#)

NEU STAR

- Request For Resources
 - Modify
 - Disconnected
 - Block Transfer
- Confirm Block(s) in Service (Part 4)
- Search Forms
- Submit Forecast
 - Create/Modify Forecast
- User Profile
- Donate Block
- Reports

glenda paige jackson@verizon (SP) Sign Out

Months to Exhaust and Utilization Certification Worksheet - TH Level (Continued)

You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Question? Email Us
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