

3939

Theresa L. O'Brien
Vice President – Regulatory Affairs

RECEIVED
2008 MAR 26 AM 3:00
BSL



234 Washington Street
Providence, RI 02903

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

March 26, 2008

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
for a new NXX code for the purpose of obtaining an LRN to activate new
switching equipment in Providence, RI

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 a new NXX code to permit Verizon RI to obtain the necessary Location Routing Number (LRN) to support activation of new switching equipment in Providence, RI. 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 Verizon RI is anxious to receive these numbers in preparation of delivering broadband services to customers, we respectfully request that the Commission address this waiver request as soon as practicable.

I. NATURE OF NUMBERING REQUEST

Verizon RI requested a new NXX code assignment specifically in the Providence rate center for the purpose of securing an LRN. A new NXX code is required since an LRN must be assigned from an NXX code that is LERG assigned to that specific switch. Utilizing an existing NXX code and a thousands block which is LERG assigned to a different switch would involve transferring the entire code from the existing switch to the new switch, pooling the remaining nine thousands blocks to the original switch, and porting any assigned customer numbers within the transferred thousands block back to the original switch. This process could potentially be service-affecting to those customers in the transferred thousands block.

Verizon is preparing to deliver services in Rhode Island that cannot be provided using circuit switching technology. New packet-switching equipment will be activated in August 2008 to support these services, which will be offered with installation of Fiber to the Premises (FTTP). The new packet switch is not replacing the existing circuit switch, so services supported by the existing circuit switch will not be affected. In order for Verizon to begin testing new services utilizing this new packet switch by August 2008, Verizon requests a waiver to permit the assignment of the required LRN in the 130 LATA. Verizon would then return the nine unused thousands blocks to the numbering pool.

On March 10, 2008, Verizon RI submitted a Central Office Code (NXX) Assignment Request (a "Part 1A" form) to NeuStar, requesting an entire NXX code for the purpose of obtaining an LRN to meet Verizon's needs. The Company explained that it did not have the needed numbers available in its existing inventory in the Providence rate center. On the same day, 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 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 a new NXX code for the purpose of obtaining an LRN be assigned to a Verizon RI Providence rate center to permit Verizon RI to activate new switching equipment in Providence, RI. 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*").

In its *Third NRO Order, Appendix A, Final Rules, 52.15(g)(4)*, the FCC states:

The NANPA must notify the carrier in writing of its decision to withhold number resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm, or may overturn, the NANPA's decision to withhold number resources from the carrier based on its determination that the carrier has complied with the reporting and number resource application requirements herein. The state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the

Ms. Luly Massaro

March 26, 2008

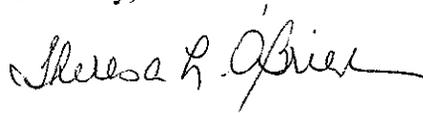
Page 3 of 3

carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.

Third NRO Order at 64. In accordance with applicable FCC rules, Verizon RI respectfully requests this waiver from the Pooling Administrator's denial of Verizon RI's request for a new NXX code. Granting this waiver will result in the release of an NXX code for the purpose of obtaining an LRN so that the Company can activate the new packet switch in Rhode Island.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa L. O'Brien". The signature is fluid and cursive, with a long horizontal stroke at the end.

Theresa L. O'Brien

Attachment

Exhibit A
Pooling Administration System Dated 10 March 2008

November 21, 2003
Attachment 3
ATIS-0300066.at3
Pooling Administrator's Response/Confirmation
TBPA Part 3

Tracking Number :
401-PROVIDENCE-RI-191372

Date of Application: 03/10/2008
Effective Date:

Date of Receipt: 03/10/2008
Date of Response: 03/10/2008

Service Provider Name: VERIZON NEW ENGLAND

(Telcordia TM LERGTM Routing Guide) OCN: 9102

NPAC SOA SPID :

Pooling Administrator Contact Information:
Dora Wirth
Phone: 925-363-8706
Signature of Pooling Administrator
Dora Wirth
Fax: 925-363-7684
Name (print)
Email:dora.wirth@neustar.com

NPA-NXX or NPA-NXX-X :

Block Assigned:

Block Reserved :
Block Reservation Expiration Date :
Block/Code Modified :

Block/Code Disconnected :

Block Contaminated(Yes or No) :

Exhibit A

If Yes, enter the number of TNS contaminated :

Switch Identification(Switch Entity/POI): PRVDRIWAPS0

Rate Center: PROVIDENCE

Rate Center Sub Zone:

X
Form Complete, request denied.

Explanation:

DR-00: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands' Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Exhibit A

Assignment activity suspended by the administrator.

Explanation:

Remarks:

1 This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)