

#4013

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November 20, 2008

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

RECEIVED
2008 NOV 20 PM 3:57

Re: Request for Waiver of NANPA's Denial of Verizon Rhode Island's Request for 3000 Numbers to Serve Johnston 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 3000 numbers to permit Verizon RI to offer service to Factory Mutual Insurance Company ("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

Factory Mutual Insurance Company, a Verizon RI customer located at 1301 Atwood Avenue, Johnston, requested 3000 telephone numbers specifically in the Cranston central office in order to provide integrated dialing at an existing facility to support the growth of the organization. As such, Factory Mutual Insurance Company is in need of 3000 consecutive numbers. Verizon RI currently does not have 3000 consecutive numbers in its inventory for the Cranston exchange. Due to Factory Mutual Insurance Company's dialing pattern, the thousand blocks must be consecutive and must begin in 1, 2 and 3 in any available exchange. Factory Mutual Insurance Company'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 November 17, 2008, Verizon RI submitted a Central Office Code (NXX) Assignment Request (a "Part 1A" form) to NeuStar, requesting the specific blocks to meet Factory Mutual Insurance Company's needs. The Company explained that it did not have the needed numbers available in its existing inventory in the Providence rate center, which serves Cranston. On November 18, 2008, 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 3000 consecutive telephone numbers be assigned to Verizon RI's Cranston central office switch to permit Verizon RI to serve Factory Mutual Insurance Company. 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 Providence Rate Center, which serves the Cranston switch, is 68.48%.

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 3000 numbers for immediate use so that the Company can continue to serve Factory Mutual Insurance Company.

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: Patricia Lucarelli, 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



Pooling Administration System

Dated 18 November 2008

November 21, 2003
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number :

401-PROVIDENCE-RI-254385

Date of Application:

11/18/2008

Effective Date:

Date of Receipt:

11/18/2008

Date of Response:

Service Provider Name:

VERIZON NEW ENGLAND

(Telcordia TM LERG TM Routing Guide) OCN:

9102

NPAC SOA SPID :

Pooling Administrator Contact Information:

Dora Wirth

Phone:

Signature of Pooling Administrator

Dora Wirth

Fax:

Name (print)

EXHIBIT A

Email:

dora.wirth@neustar.com

_____ NPA-NXX or NPA-NXX-X : _____

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

Rate Center:

Rate Center Sub Zone:

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You must meet the requirements from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, you may file an appeal with the appropriate state commission. For more information, see the Pooling Administration Guidelines for the appeals process.

_____ **Request withdrawn.**

EXHIBIT A

Explanation:

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 Id shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)