

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF TELEPORT ) CASE NO. TCS-T-25-01**  
**COMMUNICATIONS AMERICA, LLC’S )**  
**PETITION FOR A SAFETY VALVE WAIVER )**  
**) ORDER NO. 36965**  
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On July 3, 2025, Teleport Communications America, LLC (“Company”) petitioned the Idaho Public Utilities Commission (“Commission”) for a waiver of the Federal Communications Commission’s (“FCC”) guidelines for numbering resources in the Coeur d’Alene rate center (“Petition”).

On January 13, 2026, the Commission issued a Notice of Petition and Notice of Modified Procedure establishing written comment deadlines. Order No. 36905. Commission Staff (“Staff”) filed comments to which the Company replied. The Commission received no public comments.

Based on our review of the record, the Commission now issues this Final Order granting the Company’s Petition.

**BACKGROUND**

A telecommunications carrier can petition the Commission for an order overturning the North American Numbering Plan Administrator’s (“NANPA”) decision to withhold numbering resources pursuant to rules promulgated by the FCC. 47 C.F.R. § 52.15(g)(4). In rendering its decision, the Commission may consider factors such as the petitioner’s compliance with the relevant reporting and numbering resource application requirements. 47 C.F.R. § 52.15(g)(5). The Commission can also overturn the NANPA’s decision “based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.” *Id.*

**THE PETITION**

The Company requested a waiver of the FCC’s guidelines for numbering resources in the Coeur d’Alene rate center after the NANPA denied its application for additional numbering resources, citing a failure to meet the months-to-exhaust and utilization requirements. Petition at 1. The Company stated that its application with the NANPA for numbering resources in the form

of a single thousand-block of numbers was the result of a customer requesting 100 consecutive numbers that do not start with the number eight. *Id.* The Company represented that there is not currently a contiguous block of 100 numbers that do not begin with the number eight in the Coeur d'Alene inventory pool. *Id.*

### **STAFF COMMENTS**

Staff reviewed the Petition, a copy of the application that was denied by the NANPA, and information available in the North American Numbering Plan Administration System (“NAS”). Staff Comments at 2. Staff also reviewed the numbering resource application requirements set forth in 47 C.F.R. § 52.15. *Id.* Staff did not believe the Company has demonstrated a verifiable need for the requested numbering resources and recommended the Commission affirm the NANPA’s decision to deny the Company’s request. *Id.*

According to Staff, the Company had approximately 2,018 available numbers at the time of its application to the NANPA. *Id.* Following its review of information available in the NAS, Staff determined the Company’s current number blocks have a low contamination and contain at least one block of 100 continuous numbers that would satisfy the customer’s request. *Id.* Staff noted that the NANPA’s denial of the application stated that the Company had utilized only 30.8% of its currently assigned numbers. *Id.* The denial also stated that the Company had approximately 11.5 months to exhaustion of numbers. *Id.* Staff also stated that, although the Company specifically requested numbers with a 986 area code, the Company could use either of Idaho’s two area codes to satisfy the customer’s request, as Idaho has an area code overlay. *Id.*

### **COMPANY REPLY COMMENTS**

The Company contended that it had demonstrated a verifiable need for numbering resources and that it had exhausted all other available remedies. Company Reply Comments at 1. In addition to requesting 100 consecutive numbers that do not begin with the number eight, the Company stated that the customer also requested “a block where the beginning telephone number range ends in 00 and the last number in the range ends with 99.” *Id.* According to the Company, it has made multiple confirmations, including through its Telephone Number Assignment Center (“TNAC”), that it does not have the numbers to satisfy the customer’s request. *Id.*

The Company added that while its utilization rate is approximately 30.8%, it randomly assigns numbers to its active customers, leaving what the Company describes as “a patchwork” of

available numbers. *Id.* at 2. The Company further asserted that it only has access to 208 area code numbers, and not 986 area code numbers, pursuant to the Local Exchange Routing Guide—an industry reference product and database that focuses on routing and operational data used by carriers. *Id.*

### **COMMISSION FINDINGS AND DECISION**

We have jurisdiction over this matter and the issues in this case under 47 C.F.R. § 52.15(g), which empowers the Commission to review the NANPA’s decision to withhold numbering resources from telecommunications carriers in the state of Idaho.

After reviewing the Company’s Petition, Staff’s recommendation, and the Company’s reply, the Commission finds that the Petition should be granted. We accept the Company’s representation that it has confirmed through its TNAC that it is currently unable to meet the customer’s request. The Company has demonstrated a need for the numbering resources. We also find that the assignment will not detrimentally affect number resources for the Coeur d’Alene rate center.

We find it is reasonable to direct that the NANPA provide the new numbering resources requested by the Company to meet its customer’s requirements. Specifically, the NANPA should issue the Company a single thousand-block of numbers with at least one range of 100 contiguous numbers that do not begin with the number eight and wherein the beginning number of the range ends in 00 and the last number of the range ends with 99.

Additionally, we note multiple actions the Company can take to avoid the need for future filings of this nature. First, the Company should return unused numbers to offset those issued pursuant to its Petition to prevent a further decrease in its utilization rate. Second, the Company should cease its practice of randomly assigning numbers and should instead begin assigning numbers sequentially to prevent unnecessary contamination of its available numbers.

### **ORDER**

IT IS HEREBY ORDERED that the Company’s Petition for a waiver of the FCC’s numbering guidelines is granted.

IT IS FURTHER ORDERED that a single thousand-block of numbers with at least one range of 100 contiguous numbers that do not begin with the number eight and wherein the

beginning number of the range ends in 00 and the last number of the range ends with 99 should be granted to the Company in the Coeur d'Alene rate center.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order regarding any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code §§ 61-626 and 62-619.*

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 16<sup>th</sup> day of March 2026.

  
EDWARD LODGE, PRESIDENT

  
JOHN R. HAMMOND JR., COMMISSIONER

  
DAYN HARDIE, COMMISSIONER

ATTEST:

  
Monica Barrios-Sanchez  
Commission Secretary

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