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IDAHO PUBLIC UTILITIES COMMISSION

6160 Golden Hills Drive - Golden Valley - Minnesota - 55416

PHONE: 763.745.8466

FAX: 763.745.8459

Via Overnight Delivery

June 22, 2010

ELI-T-10-01

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

Re: Request for Waiver of Numbering Resource Requirements for Electric Lightwave, LLC dba Integra Telecom

Dear Ms. Jewell:

Included for filing with the Idaho Public Utilities Commission is the original plus seven copies of this letter petition and supporting documents for Electric Lightwave, LLC dba Integra Telecom's request for a waiver of the Industry Numbering Committee's Central Office Code (NXX) Assignment Guidelines.

INTRODUCTION

In accordance with Federal Communications Commission rules found at 47 C.F.R. 52.15(g)(3)(iv) and pursuant to Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee Electric Lightwave, LLC dba Integra Telecom (Integra) respectfully requests a waiver of the numbering resource guidelines in order to secure a new Local Routing Number (LRN) for assignment to the Company's new switch which will serve the Boise rate center.

SUPPORT FOR REQUEST

Central Office Code (NXX) Assignment Guidelines, Section 4.1.3 state that a service provider requesting LRNs for a rate center in which the service provider already has numbering resources must meet certain months-to-exhaust and utilization requirements. Although Integra has not yet reached the months-to-exhaust and utilization criteria for the assignment of a new LRN for the Boise rate center, it nonetheless requires the new LRN in order to deploy its new switch to serve this rate center. Integra will not be decommissioning the switch that currently serves the Boise rate center.

Attachment A to this Petition is the Pooling Administrator's response to Integra's request for the Boise rate center LRN. Attachment B to this Petition is Integra's months-to-exhaust and percent utilization worksheet dated June 9, 2010.

Electric Lightwave, LLC dba Integra Telecom
Boise LRN Request
June 22, 2010
Page 2 of 2

Integra's Pooling Administration System (PAS) contact is:

Zack Jones
Phone: 925-363-7653
Fax: 925-363-7686
Email: zack.jones@neustar.biz

Federal Communications Commission Rule 47 C.F.R.(g)(3)(iv) states in part: "[t]he carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."

CONCLUSION

Integra respectfully requests that the Idaho Public Utilities Commission grant its petition and direct the Pooling Administrator, Nuestar, to release additional numbering resources to the Company, so that it may commence the operation of its new switch.

Thank you for your assistance in this matter. If you have any questions or concerns, please contact the undersigned directly.

Sincerely,



Cathy Murray
Manager, Regulatory Affairs
Phone: 763-745-8466
Fax: 763-745-8459
E-mail: camurray@integratelecom.com

Enclosures

Murray, Catherine A.

From: zack.jones@neustar.biz
Sent: Wednesday, June 09, 2010 10:59 AM
To: Bell, Jeanne
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 208-BOISE-ID-363953



Dated 09 June 2010

November 21, 2003
ATIS-0300066.at3

Attachment 3

**Pooling Administrator's Response/Confirmation
TBPAG Part 3**

Tracking Number : 208-BOISE-ID-363953

Date of Application: 06/09/2010 **Effective Date:** _____
Date of Receipt: 06/09/2010 **Date of Response:** 06/09/2010

Service Provider Name: INTEGRA TELECOM - ID
(Telcordia TM LERG TM Routing Guide) OCN: 7865

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Zack Jones Phone: 925-363-7653
Signature of Pooling Administrator
Zack Jones Fax: 925-363-7686
Name (print)
Email: zack.jones@neustar.biz

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) :

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

BOISIDPZPS0

Rate Center:

BOISE

Rate Center Sub Zone:

X Form Complete, request denied.

Explanation:

DR-57: 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:

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 TM 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.)

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 208-BOISE-ID-363953

Date: 06/09/2010

OCN:7865

Company Name:INTEGRA TELECOM - ID

Rate Center: BOISE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):NPA NXX BLOCK ID 208 246 0 through 8 208 272 2 through 8 208 275 0 through 8 208 287 0 through 9 208 474 0 through 9 208 577 2 through 5 208 639 3 through 8 208 854 3 through 8 208 908 4 and 5 208 947 0 through 9 208 954 5 and 8 208 955 0 through 9 208 991 5 For a total of 86 blocks

Name of Block Applicant:Jeanne Bell

Signature: Jeanne Bell

Title:Number Administrator
503-453-8284

Telephone No.: 503-453-8279

FAX No.:

E-mail: jeanne.bell@integratelecom.com

A. Available Numbers:2487

B. Assigned Numbers: 83513

C. Total Numbering Resources:86000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²:0

List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth History - Previous 6 months³

159	92	56	200	120	85
-----	----	----	-----	-----	----

F. Forecast - Next 12 months⁴

120	120	120	120	120	120	120	120	120	120	120	120	120
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 120.0

H. Months to Exhaust⁵

$$= \frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	2487	20.725

I. Utilization⁶

$$= \frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 = 97.108$$

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section