

DECISION MEMORANDUM

TO: COMMISSIONER KEMPTON
COMMISSIONER SMITH
COMMISSIONER REDFORD
COMMISSION SECRETARY
LEGAL
WORKING FILE

FROM: CAROLEE HALL

DATE: JULY 28, 2010

RE: ELECTRIC LIGHTWAVE, LLC dba INTEGRA TELECOM'S
(INTEGRA) PETITION FOR A WAIVER OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO'S
BOISE RATE CENTER; CASE NO. ELI-T-10-01.

BACKGROUND

On June 23, 2010, Electric Lightwave, LLC, dba: Integra Telecom, filed a formal request for a Commission waiver of numbering resource guidelines following denial of its Application filed with the North American Numbering Plan Administrator (NANPA). According to its Application, the Company is seeking a waiver in order to secure a new Local Routing Number (LRN)¹ for assignment to the Company's new switch that will serve the Boise rate center. The Application was denied by NANPA because the current telephone numbers held by the Company are available and the requirements are not adequately being met. Staff contacted the Company to verify its remaining resources and investigate exactly what the Company could do to maximize its remaining resources. Because the Company is opening a new switch in the Boise rate center it is in need of an LRN and an entire code.

STAFF ANALYSIS

Integra participates in the thousand-block-pooling in the Boise rate center. Methods such as pooling and rate center consolidation help make number conservation efforts more effective

¹ Local Routing Number is a 10-digit telephone number used in the context of local number portability. It is an identifier of a particular CLEC's traffic/switch in the central office and is needed for porting numbers.

and are designed to extend the time it takes to exhaust a rate center's numbering resources. After evaluating Integra's waiver request, Staff believes that granting this waiver will not have any detrimental effect on the numbering resources in the Boise rate center. There remains a high demand for numbering resources within the Boise rate center; therefore, it is unlikely that any resources will be stranded or unusable in the immediate future.

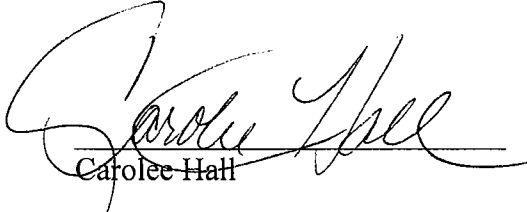
According to FCC orders and numbering guidelines, carriers may appeal NANPA decisions of this nature to the appropriate state regulatory authority. This Commission has granted similar waivers in the past to meet the requests of other carriers.²

RECOMMENDATION

Because the Company is in need of an LRN for its new switch, Staff recommends that the request for a waiver be granted.

COMMISSION DECISION

Does the Commission agree with Staff's recommendation?



Carolee Hall

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² See Order Nos. 28769, 29279, 30351, 30427, 30983 and 31034