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IDAHO PUBLIC
UTILITIES COMMISSION

June 3, 2013

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83702

POT-T-13-02

RE: Safety Valve Request of Potlatch Telephone Company d/b/a TDS Telecom for review of NeuStar Pooling Administrator Denial of Application for Numbering Resources

Dear Ms. Jewell,

Potlatch Telephone Company d/b/a TDS Telecom submits this request to the Idaho Public Utilities Commission (Commission) for review and waiver of the NeuStar Pooling Administrator's denial of our request for additional numbering resources necessary to obtain a LRN for a new switch that will be installed in Kendrick, ID.

On May 30, 2013 TDS Telecom submitted a Code Request for an additional LRN to the Pooling Administrator for the assignment of one block of 1000 telephone numbers in the 360 area code. The Pooling Administrator denied the request because TDS Telecom did not meet the months to exhaust (MTE) or utilization criteria established by the FCC.

As the Commission is aware, the FCC has adopted a safety valve mechanism to allow carriers that do not meet utilization criteria in a given rate center to obtain additional numbering resources. TDS Telecom is installing a new Metaswitch in its Kendrick, ID location and thus requires one unique NPA-NXX assigned for a LRN to be provisioned to identify the switch or POI in the number portability capable network.

The industry Location Routing Number (LRN) Assignment Practices (ATIS-0300065) document provides that:

1. A unique LRN will be provisioned to identify each recipient switch or POI in the number portability capable network.
2. A service provider will establish one (1) LRN per LATA from an assigned NXX for each recipient switch or POI in the number portability capable network.

From a number conservation perspective, TDS Telecom is requesting to be assigned all 10 blocks within the new NPA-NXX with the provision that TDS Telecom will protect all 10,000 numbers from permanent customer assignment. What this will do is prevent the nine unused blocks from being returned to the Pool and thus would prevent the possibility that another carrier request and be assigned one of the blocks from the new NPA-NXX. As such, this would help ensure the numbers do not become permanently stranded in the Kendrick, ID rate center.

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