

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSIONER ANDERSON  
COMMISSION SECRETARY  
LEGAL  
WORKING FILE

**FROM:** CAROLEE HALL

**DATE:** JANUARY 8, 2018

**RE:** TELEPORT COMMUNICATIONS AMERICA, LLC (“TCAL”) FILED A PETITION FOR A SAFETY VALVE WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES IN THE IDAHO FALLS RATE CENTER; CASE NO. TCS-T-18-01.

### BACKGROUND

On January 2, 2018, the Commission received a Petition for a Safety valve waiver of numbering resource guidelines from Teleport Communications America, LLC (TCAL”). The Safety Valve was filed following Neustar’s denial of the Company’s Application for additional numbering resources in the Idaho Falls rate center. In this Petition, TCAL indicated that on December 13, 2017, it had requested an additional five one-thousand blocks of numbers for its customer in the Idaho Falls rate center.

TCAL’s Neustar Application was denied due to the “Months To Exhaust” (MTE) calculation for the rate center. According to the report, the MTE for the Idaho Falls rate center exceeds the FCC guidelines.<sup>1</sup> Moreover, TCAL’s customer requested a specific sequential thousands-block of 208-701-2, 3, 4, 5 and 6.

### STAFF ANALYSIS

Staff has reviewed the request for the Safety Valve waiver of the “months to exhaust” threshold requirements and believes it is reasonable for the customer’s business plan.

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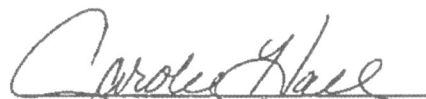
<sup>1</sup> To be assigned an additional thousands-block (NXX-X) for growth, “Months to Exhaust” must be less than or equal to 6 months. (FCC 00-104, Section 52.15 (g)(3)(iii)).

## RECOMMENDATION

Staff recommends that the waiver request for the five sequential one-thousand blocks of numbers be granted to TCAL for its customer. Specifically, if available, Staff recommends that the NPA NXX X (208-701-2, 3, 4, 5 and 6) be released to TCAL for its Idaho Falls rate center customer.

## COMMISSION DECISION

Does the Commission agree?



Carolee Hall

u/chall/decision memo/numbering/Teleport Communications America, LLC (TCAL) TCS-T-18-01