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**STATE OF NEW HAMPSHIRE
Inter-Department Communication**

**DATE: June 2, 2008
AT (OFFICE): NHPUC**

FROM: Jody O'Marra

SUBJECT: DT 08-074 Freedom Ring Communications, L.L.C. d/b/a BayRing
Communications
Petition for Waiver of NeuStar's Denial for One One-
Thousand Block

TO: Commissioners
Executive Director
Telecommunications Division Director

On May 27, 2008, Freedom Ring Communications, L.L.C. (BayRing) submitted a petition seeking a waiver of NeuStar's decision to deny BayRing's request for one one-thousand block (block). BayRing requires the block to fulfill a customer's request for 1000 Direct Inward Dial (DID) numbers. NeuStar is the division of the North American Numbering Plan Administrator (NANPA) that administers block assignments.

NeuStar's Pooling Administrator denied BayRing's request on the grounds that BayRing had not met the Months To Exhaust requirement for the rate center in which it is requesting the new block. BayRing requested the block because it does not have the required consecutive numbers in its supply of numbers.

The FCC's Numbering Resource Optimization Third Report and Order and Second Order on Reconsideration (FCC 01-362) Appendix A, Final Rules, 52.15(g) (4) states that "...The state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other remedies."

Staff notes BayRing's customer, physically located in New Hampshire, has indicated the necessity of 1000 DID numbers for implementation in June 2008. According to BayRing, the customer will begin using all 1000 numbers immediately. Staff also notes that BayRing's customer originally requested two one-thousand blocks but agreed to limit its request to one one-thousand block. Numbering resources are available for this request. Therefore Staff recommends that the Commission grant the petition for waiver of NeuStar's denial.