

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: September 2, 2010

AT (OFFICE): NHPUC

David

FROM: David Goyette, Utility Analyst III - Telecommunications

SUBJECT: DT 10-205 Freedom Ring Communications, L.L.C. d/b/a BayRing
Communications
Petition for Waiver of NeuStar's Denial for One One-Thousand Block

TO: Debra Howland, Executive Director
Kate Bailey, Director – Telecommunications
Michael Ladam, Assistant Director - Telecommunications

On August 5, 2010, 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 "MTE [months-to-exhaust] and or Utilization requirements" for the rate center in which it is requesting a block. BayRing states it requested the block because it does not have the resources available to provide one-thousand sequential numbers in the line range requested by the customer.

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."

Bayring supports its petition with a letter from the customer, which is physically located in New Hampshire. According to the letter, the customer expresses its need for 1000 DID numbers which it will begin assigning in the fall of 2010. During discussions on this matter, Bayring informed Staff that the customer requires the numbers by October, 2010.

Numbering resources are available for this request. Therefore Staff recommends that the Commission grant the petition for waiver of NeuStar's denial.