

# STATE OF NEW HAMPSHIRE

Inter-Department Communication

NHPUC 9APR15PM4:01

**DATE:** April 9, 2015

**AT (OFFICE):** NHPUC

*ML*

**FROM:** Michael Ladam, Assistant Director of Telecommunications

**SUBJECT:** DT 15-118: IDT Request for Waiver of Neustar Denial of Numbering Resources

**TO:** Commissioners  
Debra Howland, Executive Director  
Kate Bailey, Director, Telecommunications

## Executive Summary:

IDT America Corp. (IDT) has asked the Commission to overturn Neustar's denial of IDT's request for one block of telephone numbers needed to meet the requirements of a single commercial customer. Staff recommends that the Commission direct Neustar to make the additional block available to IDT.

## Background:

On April 7, 2015, IDT submitted a petition seeking a waiver of Neustar's decision to deny IDT's request for a single block of telephone numbers in the Laconia rate center. IDT asserts that it is unable to meet the needs of its customer without obtaining the requested block.

Neustar administers telephone number assignments on behalf of the North American Numbering Plan Administrator (NANPA). Neustar denied the request because IDT has not met the Months to Exhaust or utilization requirements in Laconia: that is, its demand history does not support allocating new numbers to IDT at this time under standard processes.

Under 47 C.F.R. §52.15(g)(4), a state commission "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 available remedies."

IDT obtains numbers on behalf of its business partner Metrocast Cablevision of New Hampshire, LLC (Metrocast). Much of Metrocast's customer base is residential. Although residential telephone numbers are typically allocated to customers in sequence, over time – as customers leave the area or port their numbers to another provider, making their numbers available again – the pool of available numbers becomes fragmented.

IDT reviewed their currently available numbering blocks with staff. Although the company has several hundred telephone numbers available, these numbers are interspersed with other assigned numbers. There is no contiguous block of even five numbers available for allocation to a customer. Although telephone providers cannot expect to obtain numbers to meet "vanity" requests such as 603-PUC-HELP, we do generally support their access to efficiently-used blocks of contiguous numbers.

Staff has also examined the numbering resources available in Laconia. A block can be assigned to IDT without requiring the assignment of a new code to the rate center, which would accelerate the exhaustion of our single area code. Note that the numbers in IDT's fragmented blocks will continue to be assigned to residential customer seeking one or two numbers; they will not be "lost."

In Staff's assessment, IDT has demonstrated a verifiable need for the number block requested, and has exhausted other available remedies. We recommend that the Commission grant a waiver of the Neustar denial of IDT's request.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.