

To the Code Administrator,

Verizon requested a full exchange code ("NXX") to serve the needs of its customer, a paging company. NeuStar denied Verizon's request because Verizon had not met the months-to-exhaust requirement. Verizon requested a waiver from the Department.

The Department denies Verizon's request. According to confidential and proprietary information submitted as part of its waiver request, Verizon's customer requires substantially less than a full NXX in order to provide paging services in the relevant rate center. However, because of the configuration of the particular paging service taken by the customer, Verizon must devote an entire NXX to the service wherever it is requested, no matter how many or how few line numbers the customer actually needs, and Verizon cannot donate idle blocks from the NXX to the number pool.

When evaluating waiver requests, the Department considers, among other things, the purpose for which the requested numbers will be used, and whether the carrier's inability to meet its customer's needs results from the manner in which the carrier manages its numbering resources. Although the paging company provides a useful service, the Department is deeply concerned that the specific paging service provided by Verizon results in the stranding of numbering resources. The Department is satisfied that service can be provided to paging companies in a manner which does not strand numbers, and therefore the Department denies Verizon's waiver request.

Please do not hesitate to contact me if you have any questions.

**April Mulqueen**

Assistant Director, Telecom Division

Massachusetts Department of Telecommunications and Energy

One South Station

Boston, MA 02110

(617) 305.3748 voice

(617) 478.2588 fax

[april.mulqueen@state.ma.us](mailto:april.mulqueen@state.ma.us)