

To the Code Administrator,

Verizon requested a full exchange code ("NXX") to serve 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 substance of this waiver request is nearly identical to the substance of a waiver request denied by the Department on April 25, 2003, and the Department denies Verizon's current request on the same grounds.

Because of the configuration of the particular service taken by the customer, Verizon must devote an entire NXX to the service wherever it is requested, not matter how many or how few line numbers the customer actually needs, and Verizon cannot donate idle blocks from the NXX to the 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 customers 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.

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