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September 25, 2007

Michael Isenberg, Esquire
Director, Telecommunications Division
Massachusetts Department of Telecommunications and Cable
One South Station, 2nd Floor
Boston, MA 02110

**Re: Request for Waiver of NeuStar's Denial of Verizon MA's Request for
500 numbers to serve a large business customer**

Dear Mr. Isenberg:

The purpose of this letter is to seek a waiver of NANPA's (*i.e.*, NeuStar's) decision to deny Verizon Massachusetts' ("Verizon MA") request for 500 numbers to permit Verizon MA to offer service to a large business customer. Verizon MA takes such action pursuant to Federal Communications Commission ("FCC") rules [47 C.F.R. 52.15(g)(3)(iv)].

I. Nature of Numbering Request

The client, in anticipation of its network growth, requested from Verizon 500 consecutive DID telephone numbers in the XXXXXXXX central office. A copy of the customer's letter to Verizon MA indicating the need for the numbers is attached as Exhibit A.

Verizon MA currently does not have in its inventory for the XXXXXX exchange 500 consecutive numbers that would satisfy the requirements of the customer. On September 14, 2007, Verizon MA ("the Company") submitted a Central Office Code Assignment Request ("Part 1a form") to NeuStar, requesting the numbers to meet the customer's needs and explaining that it did not have the needed numbers available in its existing inventory in the XXXXXX rate center. A copy of the Part 1a form is attached as Exhibit B.

On September 18, 2007, NeuStar's Central Office Code Administrator denied the Company's request on the grounds that Verizon MA had not met the rate-center-based months-to-exhaust ("MTE") criteria, as set forth by the FCC. This denial was based upon the Company's not meeting the MTE requirements – notwithstanding Verizon MA's inadequate numbering resources to satisfy this specific customer's request. A copy of the decision denying Verizon MA the numbers for the customer is attached as Exhibit C.

Verizon MA submitted the MTE Certification Worksheet required by NeuStar, completed in accordance with the Industry Numbering Committee's Central Office Code Assignment Guidelines to meet the client's request. Attached as Exhibit D is the MTE Certification for Verizon MA's XXXXXXXXXX rate center.

Verizon MA requested the telephone numbers from NeuStar because it did not have them in its supply of numbers for the XXXXXXXXXX rate center. Attached as Exhibit E is a report from Verizon's Number Administration Center supporting Verizon MA's claim that the client's request could not be satisfied with the existing numbering resources in that rate center. Verizon MA considers Exhibits A through E to be highly competitively sensitive and requests that the Department afford this information proprietary treatment because it contains customer-specific data and data relating to number utilization and forecasted growth in the XXXXXXXXXX rate center.

II. Request for Waiver of NeuStar's Central Office Code Denial

By way of this letter, Verizon MA requests that the Department overturn NeuStar's decision and order that 500 consecutive telephone numbers be assigned to Verizon MA's XXXXXX central office switch to permit Verizon MA to serve its customer. The Department has the authority to take such action pursuant to the FCC's Numbering Resource Optimization ("NRO") *Third Report and Order and Second Order on Reconsideration* (FCC 01-362), released December 28, 2001, in CC Docket No. 96-98 and CC Docket No. 99-200 (*"Third NRO Order"*).

In the *Third NRO Order, Appendix A, Final Rules, 52.15(g)(4)*, the FCC states:

The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has complied with the reporting and numbering resource application requirements herein. 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 available remedies.

Further, the FCC states:

We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory. Carriers may demonstrate such a need by providing the state with documentation of the customer request and current proof of utilization in the rate center.

Third NRO Order at 64. In accordance with applicable FCC rules, Verizon MA respectfully asks that the Department grant this waiver request so that the Company can continue to serve its customer.

Thank you for your assistance in this matter. Please contact me at 617-743-9250 if you have any questions concerning this request.

Very truly yours,

Enclosures

cc: Catrice Williams, Secretary
Service List DTE 01-33