

**Consolidated Communications**  
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**Scott Kitchen**  
Senior Director, Regulatory  
Compliance



April 7, 2020

Mr. Steve Kahl, Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, 12<sup>th</sup> Floor  
Bismarck, ND 58505-0480

Re: Waiver of Months to Exhaust Threshold Requirement – Fargo Rate Center

Dear Mr. Kahl,

Consolidated Communications Enterprise Services, Inc. (CCES) requests the North Dakota Public Service Commission to direct the North American Numbering Plan Administrator (NANPA) to provide CCES with additional NXXs in its Fargo, North Dakota Rate Center.

Consolidated has requested a block of One (1) consecutive 1000 number block (701-NXX 5000 through 5999) for use with a customer service request from The City of West Fargo to accommodate the City's request for consecutive numbers since there is no current gap of 1000 DIDs in the current/existing DID number block.

On January 20, 2020, CCES submitted a request to NANPA for the requested NXX in accordance with current guidelines, including the Months to Exhaust Certification (see attached Appendix 2, Thousands-Block Months to Exhaust Certification Worksheet - TN Level). This request is made because CCES does not have the blocks of sequential numbers available within the Fargo Rate Center in West Fargo, ND and is unable to use numbers from another switch to satisfy the customer's request. On January 20, 2020, the NANPA's Pooling Administrator denied the request on the grounds that CCES had not met the MTE threshold necessary in order to obtain growth number resources ( see attached Pooling Administrator's Response/Confirmation - Part 3A).

The FCC's March 31, 2000 Order in its Number Resource Optimization docket states that a carrier may challenge a NANPA decision to the appropriate state regulatory commission, and that the state commission may affirm or overturn NANPA's decision to withhold numbering resources. Furthermore, in the FCC's December 28, 2001 Order in its Number Resource Optimization docket, the FCC states that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a customer request. In the December 28, 2001 Order, the FCC

additionally states that a carrier may utilize a "safety valve" in which the state commissions may expeditiously review and act upon a carrier request, in most instances, within 10 business days

CCES formally requests that the Commission review and overturn NANPA's decision so that we may meet the demands of our customer, The City of West Fargo, and provide the services requested so that The City of West Fargo may meet the needs of its operations.

Please contact me at the letterhead address or phone me at 936-521-7736 if I may provide any further information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Kitchen", with a long horizontal flourish extending to the right.

Scott Kitchen  
Manager-Regulatory Compliance

Enclosures

Thousands-Block Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 701-FARGO-ND-1210134

Date: Monday, January 20, 2020 OCN: 4708 Company Name: CONSOLIDATED COMMUNICATIONS ENTERPRISE SVCS-ND

Rate Center: FARGO

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 701-356, 701-364, 701-499, 701-551,

Name of Block Applicant: Mike Brinker

Signature: Mike Brinker

Title: Manager-Engineering 1671

Phone: 218-336-4171-

Fax: 612-977-

E-Mail: mike.brinker@enventis.com

A. Available Numbers<sup>3</sup>: 6220

B. Assigned Numbers: 33780

C. Total Numbering Resources<sup>4</sup>: 40000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>5</sup>: 0

List  
Excluded  
Code(s) or  
Block(s):

Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont
h	h	h	h	h	h	h	h	h	h	h	h	h
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth History - Previous 6 months<sup>6</sup>

0   0   0   0   0   0

F. Forecast - Next 12 months<sup>7</sup>

1   0   0   0   0   0   0   1   0   0   0   0

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: 0.167

H. Months to Exhaust<sup>9</sup> =  $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	6220	37245.509

I. Utilization<sup>10</sup> =  $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)- Excluded Numbers (D)}} \times 100 = \underline{84.45}$

Total Numbering Resources (C)- Excluded Numbers (D)

Explanation: We have a large customer requesting a 1000 block for their own use.

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

# Pooling Administration System

Dated 20 January 2020

## Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 701-FARGO-ND-1210134

Date of Application: 01/20/2020 Effective Date: \_\_\_\_\_

Date of Receipt: 01/20/2020 Date of Response: 01/20/2020

Service Provider Name: CONSOLIDATED COMMUNICATIONS ENTERPRISE SVCS-ND

(LERG™ Routing Guide<sup>1</sup>) OCN: 4708

Parent Company OCN: 4708

NPAC SOA SPID : \_\_\_\_\_

### Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-420-0346

Signature of Pooling Administrator

Margaret Harrell-Simington Fax: 925-420-0377

Name (print)

Email: [mharrell-simington@somos.com](mailto:mharrell-simington@somos.com)

NPA-NXX or NPA-NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_

Block Reserved : \_\_\_\_\_

Block Reservation Expiration Date : \_\_\_\_\_

Block/Code \_\_\_\_\_

Modified : \_\_\_\_\_

Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated (Yes or No): \_\_\_\_\_

If yes, enter the number of TNs contaminated (1-1000):  
\_\_\_\_\_  
\_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>: FARGND01DS1

Rate Center: FARGO

**X** Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.**

Request Withdrawn.

Explanation:  
\_\_\_\_\_  
\_\_\_\_\_

Assignment Activity Suspended by Administrator.

Explanation:  
\_\_\_\_\_  
\_\_\_\_\_

Remarks:

\_\_\_\_\_  
  
\_\_\_\_\_

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<sup>1</sup> iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>™</sup>, CLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and TPM<sup>™</sup> Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

<sup>2</sup>List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

<sup>3</sup>The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>4</sup>The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>5</sup>Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>6</sup>Net change in Telephone Numbers (TN) no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

<sup>7</sup>Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>10</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).



Date 1/13/2020

Consolidated Communications Inc  
Attn: Sara Dixon

I am writing to request an additional Direct Inward Dial (DID) number block for the City of West Fargo, West Fargo, North Dakota  
As the city's telephony infrastructure is further consolidated and flattened as well as migrated into the Enterprise City of West Fargo dial plan, this request is for the specific block of DID numbers: 701-NNX-5000 thru 701-NNX-5999, as there is no current gap of 1000 DID's in the current/existing DID number block.

Please let me know if you have any questions, as well as if you can provide me with the process and timeline line to fulfill this request I would greatly appreciate it.

Thank You,

A handwritten signature in black ink that reads "James Anderson".

James Anderson  
Director of Information Technology  
City of West Fargo  
701-433-5353  
[James.anderson@westfargond.gov](mailto:James.anderson@westfargond.gov)