

ORIGINAL

December 17, 2001

By Overnight Courier

Jean D. Jewell
 Commission Secretary
 Idaho Public Utilities Commission
 472 West Washington
 Boise, Idaho 83702-5983

Re: Case No. GNR-T-00-36; Order No. 28902 – In the Matter of the
 Petition of the North American Numbering Plan Administrator
 for the Approval of Numbering Plan Area Relief for the 208 Area
 Code

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 Idaho Public Utilities Commission

Dear Ms. Jewell:

Pursuant to the NPA Code Relief Planning & Notification Guidelines¹, the North American Numbering Plan Administrator NeuStar, Inc. (“NANPA”), as a neutral third party administrator, hereby notifies the Idaho Public Utilities Commission (“Commission”) that the Idaho telecommunications industry request for two new relief NPA codes as ordered by the Commission in its December 5, 2001 order directing a three-way geographic split of the 208 numbering plan area (“NPA”) code (the “208 Relief Order”)² is denied.³

The Commission’s 208 Relief Order is inconsistent with the NPA Code Relief Planning Guidelines⁴, which state that imbalances in the projected lives of the proposed NPAs greater than 10 years shall be avoided. In its 208 Order, the Commission ordered a three-way geographic split as the means of relief for the 208 NPA and the three

¹ NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016 July 2, 2001) (“NPA Code Relief Planning Guidelines”). The NPA Code Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>. FCC rules require NANPA to assign and administer NANP resources in an efficient, effective, fair, unbiased, and non-discriminatory manner consistent with industry-developed guidelines and Commission regulations. 47 C.F.R. §52.13(b)(3), (d).

² *In the Matter of the Petition of the North American Numbering Plan Administrator for the Approval of Numbering Plan Area Relief for the 208 Area Code*, Case No. GNR-T-00-36, Order No. 28902 (Dec. 5, 2001).

³ Joe Cocke, Senior NPA Relief Planner, NANPA, submitted the application for the relief NPA code on behalf of the Idaho telecommunications industry on December 7, 2001.

⁴ NPA Code Relief Planning Guidelines at §5.0(g). See 208 Relief Order at 14-16.

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resulting NPAs have projected lives of 13, 17 and 40 years, a difference greater than 10 years.⁵ Recently, the Federal Communications Commission ("FCC") stated that state commissions are not free to disregard industry guidelines and the FCC "intends to review carefully and critically any future area code relief plans that are clearly outside the industry guidelines."⁶

Thus, consistent with the NPA Code Relief Planning Guidelines, NANPA hereby denies the request for a new 208 relief NPA.⁷ The Commission may submit to NANPA a request for a relief NPA consistent with the NPA Code Relief Planning Guidelines or, may appeal the denial to the appropriate governmental/regulatory body consistent with the appeals process described in the NPA Assignment Guidelines.⁸

Sincerely,



Ronald R. Conners
Director
North American Numbering Plan Administrator

cc: Jeff Carlisle
Diane Harmon
Cheryl Callahan
Sanford Williams
Service List

⁵ 208 Relief Order at 12-16.

⁶ Letter from Lawrence E. Strickling to Lawrence G. Malone (Dec. 3, 1999). Based upon specific circumstances of the case at hand, the FCC directed NANPA to assign a relief NPA for the 914 NPA according to the New York Commission's order directing a geographic split which split five rate centers.

⁷ As the NPA Code Administrator, NANPA must respond in writing regarding its decision within 30 working days from receipt of the assignment request form in one of four ways: 1) grant the assignment; 2) deny the assignment; 3) require further information; or 4) refer the request to the Industry Numbering Committee ("INC"). NPA Allocation Plan and Assignment Guidelines (INC 96-0308-011 Feb. 28, 2000) ("NPA Assignment Guidelines") at §5.2. The NPA Assignment Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

⁸ NPA Assignment Guidelines at §8.0.