

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Consideration	)	
Of Telephone Safety Valve Requests and Other	)	Case No. 10-884-TP-UNC
Number Resource Related Filings	)	

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**MOTION OF TDS TELECOM ON BEHALF OF LITTLE MIAMI TELEPHONE  
COMMUNICATIONS CORPORATION  
FOR AN EXTENSION OF A WAIVER**

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Pursuant to Section 52.15(g)(3)(iv) of Title 47 of the Code of Federal Regulations ("C.F.R."), TDS Telecom on behalf of Little Miami Telephone Communications Corporation ("Little Miami") petitioned the Public Utilities Commission of Ohio ("Commission") to reverse a decision of the Pooling Administrator ("PA" or "Neustar") denying Little Miami's request for numbering resources in the Fayetteville rate center. Petition (June 30, 2017). The petition was granted on August 1, 2017. For the reasons discussed in the memorandum in support, Little Miami moves for an order extending the waiver for an additional ninety (90) days.

Respectfully submitted,

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Counsel of Record for TDS

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**MEMORANDUM IN SUPPORT OF MOTION OF TDS TELECOM ON BEHALF OF  
LITTLE MIAMI TELEPHONE COMMUNICATIONS CORPORATION  
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Little Miami submitted a request to Neustar for a one-thousand-number block in accordance with current guidelines, including the months-to-exhaust ("MTE") certification procedures established in the Central Office Code Assignment Guidelines. As part of a Connect America Fund broadband project, Little Miami is installing a new Metaswitch which will eventually replace the existing legacy switch. In order to conduct an orderly transition to this new platform, Little Miami requires the use of numbering resources, specifically a Local Routing Number ("LRN"), that will allow these switches to coexist with the legacy equipment. Once the transition is complete, Little Miami intends to return the resource to the PA pool for reuse elsewhere in the State.

On June 15, 2017, Little Miami's request for the additional numbers was denied by Neustar because Little Miami did not meet the utilization threshold necessary in order to obtain numbering resources. The Federal Communications Commission ("FCC") requires a Months-To-Exhaust ("MTE") of six months or less, and Little Miami was then at 274.10 months for the Fayetteville rate center.

Because Little Miami did not meet the PA utilization guidelines needed to obtain a new LRN in Fayetteville, Ohio, it requested a waiver in the form of an administrative order from the

Commission. Through an Attorney Examiner's Entry, the Commission granted the waiver on August 1, 2018.

The switch upgrade has not proceeded as expeditiously as anticipated, and Little Miami understands that there may be a request from the numbering administrator to reclaim the LRN by October 31, 2018 because of a delay in the use of the resource. To prevent the switch upgrade from being disrupted due to the reclamation of the resource, Little Miami is requesting an extension of the waiver for an additional ninety (90) days.

As noted in the initial petition for a waiver, this installation of the Metaswitch represents a significant investment in Ohio, and Little Miami requests that the Commission support these investments by granting this waiver extension.

Respectfully submitted,

/s/ Frank P. Darr  
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**CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following. In addition, I hereby certify that a service copy of the foregoing *Motion of TDS Telecom on Behalf of Little Miami Telephone Communications Corporation for an Extension of a Waiver and Supporting Memorandum* was sent by, or on behalf of, the undersigned counsel for TDS Telecom to the following parties of record on this 18<sup>th</sup> day of October 2018, *via* electronic transmission, hand-delivery or U.S. mail, postage prepaid.

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COMMISSION OF OHIO**

/s/ Frank P. Darr

Frank P. Darr

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 10-0884-TP-UNC**

Summary: Motion of TDS Telecom on Behalf of Little Miami Telephone Communications Corporation for an Extension of Waiver with Supporting Memorandum electronically filed by Mr. Frank P Darr on behalf of TDS Telecom