



10300 6<sup>th</sup> Ave. North  
Plymouth, MN 55441-6371  
952.230.4100  
952.230.4200 fax  
www.onvoy.com

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February 28, 2014

Mr. Patrick Steffensen  
South Dakota Public Utilities Commission  
Capital Building, 1<sup>st</sup> Floor  
500 E. Capital Ave  
Pierre, SD 57501-5070

REQUEST FOR WAIVER – SIOUS FALLS, SD

Dear Mr. Steffensen:

Please accept this letter as our formal request for a waiver to allow Onvoy to temporarily have two LRNs on one switch in Lata 640. Per the TBPAG Guidelines Section 8.2, *"An SP requiring an LRN will not be assigned an NXX for the sole purpose of establishing an LRN (either initial or growth NXX in a rate area) unless that service provider's switch or subtending POI does not yet have an LRN for the LATA where the SP intends to provide service."*

360networks was acquired by Zayo Group (which also owns Onvoy) in December 2011. Onvoy has been using the legacy 360networks (Zayo) OCN 267E. Onvoy is working on a large corporate roll up project that, once complete, will allow us to migrate all of the resources currently assigned to the legacy 360networks OCNs to Onvoy OCNs, and will no longer use the legacy 360networks (Zayo) OCNs. We plan to have everything in place and complete by July 1, 2014. In order to do this without impeding our ability to continue to do business throughout the process, we need to establish initial block and LRN under the Onvoy OCN (858G) using our current switch (SXLFSDCOTMD). Once established, we will begin the process of transferring all of our current resources under the legacy 360networks (Zayo) OCN to the Onvoy OCN, and will be in compliance with the guidelines that allow for only one LRN per switch, per Lata.

We have followed the process and submitted our request to pooling and received our rejection. With your approval, we can resubmit our request to pooling and get the necessary code and block assignment (two blocks will be retained, eight blocks returned to pooling), create the new LRN and proceed with the transfer and migration of our NE resources in order to complete our project. Our project also includes reviewing our needs and resources and return all unnecessary resources to pooling so as to not burden the pooling resources.

Please let me know if you have any questions or require additional information. Thank you in advance for your consideration.

Regards,

*/s/ Joani O'Neill*

Joani O'Neill  
**Onvoy/Voip 360**  
130 N. Main Street, 3<sup>rd</sup> Floor  
Butte, Montana 59701  
406-496-6522 (office)  
406-496-6584 (fax)  
[Joani.oneill@onvoy.com](mailto:Joani.oneill@onvoy.com)