



May 11, 2021

E-FILING

Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 E Capitol Avenue  
Pierre, SD 57501

**RE: In the Matter of Filing by Midcontinent Communications Waiver Request for  
Number Block Release First Data Request  
Docket No. TC21-020**

Dear Ms. Van Gerpen:

In response to Commission staff questions regarding Midco's waiver request, Midco respectfully submits the following responses.

1. Who is the customer making the numbering request? Provide documentation explaining the customer's request and inquiry.

Response: [REDACTED]

2. Demonstrate why this customer request cannot be met (fully or partially) with current inventory.

Response: Midco does not have a sequential block of 1,000 numbers available from its current inventory that would satisfy the Customer's request. Midco would be unable to accommodate the Customer's internal dialing plan because it would require assigning non-sequential numbers out of multiple blocks of numbers.

3. How many of the 2,000 numbers will be utilized by the new customer?

Response: The Customer will utilize 1,000 of the numbers immediately. The initial order for numbering resources requested two possible assignment preferences which was then misinterpreted as the amount requested of 2,000. An updated order for numbering resources requested only one block which mirrors the Customer's request.

4. Why do the numbers with zero in the Subscriber Line Identifier not work with the customer's internal dialing plan?

Response: To clarify, it is the actual prefix (NXX) that the customer's internal dialing plan cannot use a prefix ending in zero, one or nine in the established 5-digit extensions.

5. Does the language "customer requests: 605-606-1 indicate that Midco only requested 1,000 numbers from Somos?

Response: The updated order now properly mirrors the Customer's request for 1,000 numbers.

6. Will the customer be able to relinquish any of their existing numbers?

Response: Customer has agreed to relinquish the numbers currently assigned.

7. Will any of these requested number be able to be returned? What are the criteria for returning any unused numbers.

Response: With the clarification of the amount of requested numbers, all 1,000 numbers will be utilized by the Customer. The criteria for returning any unused numbers is any thousands-block (ten percent contaminated or less) in inventory that providers do not anticipate using in the next six months should be returned to the pool. Midco files the FCC's 502 Utilization every 6 months and will review utilization thresholds at the next filing date.

8. Would Midco be amenable to provide a report showing the utilization of these 2,000 numbers in 2 years?

Response: With the clarification of the amount of requested numbers, all 1,000 numbers will be utilized by the Customer once assigned.

9. What did Midco's Rate Center Months to Exhaust and Rate Center Utilization need to be in order to meet the requirement and not need to make a waiver request?

Response: In order to be assigned an additional thousands-block (NXX-X) in a Growth numbering request, "Months to Exhaust" must be less than or equal to 6 months and/or the Rate Center Utilization threshold requirement of 75 percent. (47 CFR § 52.15 (g)(4)(iii)).

[REDACTED]

10. Why didn't the explanation for why the request was denied include anything about Midco not meeting the Rate Center Months to Exhaust and Rate Center Utilization requirements?

Response: The denial of Midco's request stated, "*No documentation to support the State Waiver request was received. Please submit your request with documentation supporting a State Waiver was required.*" It would be difficult to speculate why MTE and Rate Center Utilization was not included in the denial.

11. If available, provide the "Thousands-Block Application Form – Part 1A" form.

Response: The Application Form is completed electronically and is not available once submitted.

Should you have any questions, please contact me via e-mail at [Pat.Mastel@Midco.com](mailto:Pat.Mastel@Midco.com) or by phone at (605) 271-0594.

Respectfully,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Pat Mastel  
VP & General Counsel  
Midco