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FCC Mail Room

Paul Kjellander
Commissioner

Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

C.L. "Butch" Otter
Governor

January 26, 2012

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: CC Docket No. 99-200, DA 11-2074

Dear Secretary Dortch:

The Idaho Public Utilities Commission (IPUC) respectfully files this letter in support of the Public Service Commission of Wisconsin (PSCW) comments filed in the Federal Communications Commission's (FCC) Docket No. 99-200, DA 11-2074. The FCC issued a Public Notice¹ to refresh the record on several petitions² seeking a limited waiver of FCC rules to allow certain Voice over Internet Protocol (VoIP) providers direct access to numbering resources from the North American Numbering Plan Administrator (NANPA) and Pooling Administrator (PA). The Petitions seek the same limited waiver of 47 C.F.R. § 52.15(g)(2)(i) and that the FCC granted to SBC Internet Services Inc. (SBCIS) in 2005.³

¹ *Wireline Competition Bureau Seeks to Refresh Record on Petitions for Waiver of the Commission's Rules Regarding Access to Numbering Resources*, Public Notice, CC Docket No. 99-200, DA 11-2074 (Dec. 27, 2011).

² The Petitioners include RNK Inc. (RNK), Nuvio Corporation (Nuvio), UniPoint Enhanced Services d/b/a/PointOne (PointOne), Dialpad Communications, Inc. (Dialpad), Vonage Holding Corporation (Vonage), VoEX Inc. (VoEX), Qwest Communications Corporation (Qwest), CoreComm-Voyager Inc. (CoreComm-Voyager), Net2Phone, WiTel Communications, LLC (WiTel), Constant Touch Communication (Constant Touch) and Frontier Communications of America (Frontier) (Petitioners).

³ *Administration of the North American Numbering Plan*, CC Docket 99-200, Order, FCC 05-20 (Feb. 1, 2005) (SBCIS Order).

Providing uniform number resource requirements on all provider types will better protect consumers and enhance the abilities of states to effectively oversee their numbering conservation efforts. The IPUC files this letter in support of the recommendations made by the Public Service Commission of Wisconsin (PSCW)⁴ and encourages the Commission to grant the Petitioners' requests for direct access to numbering resources provided that the conditions described in the PSCW's comments are imposed on all Petitioners.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Paul Kjellander".

Paul Kjellander
President

N:Dortch_pk

⁴ See Comments of the Public Service Commission of Wisconsin filed January 25, 2012.