



December 30, 2025

Via E-File

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

Re: In the Matter of Midcontinent Communications Waiver Request for Number Block Release

Dear Ms. Van Gerpen:

By this letter, Midco seeks a waiver of months-to-exhaust threshold requirements outlined in the Federal Communications Commission's ("FCC") Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200. Such waiver will allow the Pooling Administrator (Somos, Inc.) to provide numbering resources to Midco.

Midco has received a verifiable request from a specific enterprise customer requiring 5,000 contiguous numbers within the Rapid City rate center to support and accommodate their growing requirements. The customer's Letter of Intent is attached as **Confidential Exhibit A**.

Midco currently maintains sufficient numbering resources to accommodate incremental requests without the need for an additional block. However, the existing inventory is insufficient to meet the requirement for 5,000 numbers within the Rapid City rate center. After review, we confirmed that no available numbers, including aging or reserved inventory, can accommodate this request.

On December 12, 2025, Midco submitted a request to the Pooling Administrator for five one-thousand blocks in the Rapid City rate center. The Pooling Administrator System denied Midco's request for the 5,000 block of numbers because the required Months to Exhaust and/or Utilization requirements were not met.

In order to be assigned an additional thousands-block (NXX-X) in a numbering request, “Months to Exhaust” must be less than or equal to six (6) months and the Rate Center Utilization threshold requirement of seventy-five (75) percent. (47 CFR § 52.15 (g)(4)(iii)). Midco’s current MTE is 9,567.60 months and Rate Center Utilization threshold is 57.12 percent as shown in **Exhibit B- MTE Block Form**.

The Federal Communications Commission (FCC) created a waiver process that allows carriers to request additional numbering resources when they can show a genuine need – such as a specific customer requiring a large block of numbers. This process, referred to as the “safety valve,” is described in the FCC’s *Third Report and Order* (FCC 01-362, para. 57-66) and became effective on March 14, 2002. Under this Order, state commissions have the authority to review waiver requests, with the FCC recommending that these requests be handled promptly.

Pursuant with the Order, Midco respectfully requests the Public Utilities Commission to approve its waiver of the FCC’s months-to-exhaust requirements with respect to the Rapid City rate center, and to direct the Pooling Administrator to allocate five contiguous one-thousand blocks to Midco to fulfill this specific customer need. The directive from the Commission can be sent to:

Kevin Gatchell
PA Code Administrator
Somos, Inc.
1800 Sutter St.
Concord, CA 94520
Phone: 925-420-0344
Fax: 924-420-0377
Email: KGatchell@Somos.com

Thank you for your attention to this matter. If you have any questions or concerns, please contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick McCann", with a stylized flourish at the end.

Patrick McCann
SVP of Legal and General Counsel
Midcontinent Communications