



June 8, 2005

Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Via Electronic Filing
Hard Copy to Follow - USPS

Re: Docket No. UT-030898 – Advanced TelCom, Inc. Waiver for Assignment of Numbering Resources

Attn: Ms. Rebecca Beaton

Dear Ms. Washburn and Ms. Beaton:

In its July 9, 2003 Order No. 1 in the above noted proceeding, the Washington Utilities and Transportation Commission (Commission) granted the request of Advanced TelCom Inc. (ATI)¹ for one block of 1,000 numbers in the Whatcom County rate center. The Commission's grant of ATI's request was conditioned upon the requirement that the Company not make any additional number assignments to its customers from four existing, assigned blocks: 360-296, 360-306, 360-506, and 360-594. ATI has abided by this requirement and herein reports the current status of these NPA-NXXs, and one other Whatcom prefix that may have been intended for inclusion in the Commission's 2003 Order but was not. ATI's review of its Whatcom County numbering resources revealed the following:

1. **360-296:** This entire code is still assigned ATI. At this time, the Company can return all 1,000 blocks with the exception of the 7XXX block, which appears to be contaminated. However, ATI will continue to monitor and research this block.
2. **360-306:** This code is no longer assigned to ATI. Several 1,000 blocks have been assigned to other carriers. (Focal Communications - OCN 4273 - is the code holder and is using the 5XXX block; Pacific Bell Mobile Services - OCN 6672 – has been assigned the 0XXX block; all other blocks appear to be available for assignment.)
3. **360-506:** ATI records indicate that this code was returned in July of 2004, but we were not able to verify this in the Local Exchange Routing Guide (LERG).
4. **360-594:** This entire code assigned to ATI. The 4XXX block has 120 numbers in use and is therefore too contaminated to return to the pool. The remaining nine blocks are

¹ Eschelon Telecom, Inc. acquired ATI December 31, 2004.

available for return to the pool. ATI will Intra Service Port any stray numbers in those blocks and will continue to monitor and research these stray numbers.

5. **360-255:** This entire code is still assigned to ATI and is the one NPA-NXX not addressed in the Commission's July 2003 Order. Seven 1,000 blocks are available for return to the pool. ATI will Intra Service Port any stray numbers in those blocks and will continue to monitor and research these stray numbers.

Due to a pending need for another 1,000 block of numbers, which the 'discovery' of the 360-255 assignment alleviates, ATI respectfully requests confirmation of the Commission's acceptance of the Company's numbering resource evaluation. Alternatively, unless we hear differently from the Commission by June 24, 2005, we will assume that the evaluation and proposed returns to the pool are acceptable to the Commission.

Should you have any questions concerning Eschelon's research and above stated evaluation, please contact Sheila Janz, Network 911 and Code Administrator, Eschelon Telecom, Inc., at 612-436-6658, or via email to: sejanz@eschelon.com. The undersigned is also available for questions.

Sincerely,

Cathy Murray
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Cc: Sheila Janz, Eschelon