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October 19, 2010

Washington Utilities and
Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504-7250

2010 OCT 19 PM 3:09

Re: Number Block Waiver for Providence Medical Center – Everett, WA (UT-101591)

Frontier Communications Northwest Inc. (formerly known as Verizon Northwest Inc.) filed a request on September 27, 2010 with the Washington Utilities and Transportation Commission to direct the Pooling Administrator (PA) to provide Frontier with one five thousand number block to satisfy the requirement for additional numbers from Providence Everett Medical Center located in Everett, WA in the Everett Rate Center, NPA 425, LATA 674, OCN 4324. This request is currently pending in Docket No. UT-101591. At the request of Staff, the waiver request is amended for approval of 3,000 numbers to serve the Center's immediate needs with an additional 2,000 numbers held in reserve. As noted in the customer's letter submitted with the filing, to avoid duplicating extensions they have requested numbers in specific blocks. We ask that the following be assigned under the three thousand block; NPA-NX6-3XXX, NPA-NX6-4XXX, NPA-NX6-5XXX and assign the following for the two thousand numbers held in reserve: NPA-NX6-7XXX and NPA-NX6-8XXX.

The customer requested numbers to support an expansion of its medical center campus, the new Providence Medical Center Tower scheduled to open in January 2011. The block of numbers will be used for office/floor telephones, patient telephones, fax lines, alarm lines and wireless devices needed to support patient care. The customer currently does not have enough numbers to accommodate its new needs. This request for numbers is in addition to the existing numbers currently in use by the Providence Everett Medical Center.

This waiver request is made because Frontier's request for a three thousand number block was denied by the PA because the serving central office does not meet the six (6) "months to exhaust" or "utilization" criteria. The PA requires the "months to exhaust" be less than or equal to six (6) months and the serving central office is currently at 999.9 months. Also, the percent utilization is currently at 40.85%, which is less than the 75% utilization required by the FCC. There are currently 62 blocks available in the Rate Center. The projected exhaust of NPA 425 is the 4th Quarter of 2031.

The Washington Commission has the authority to review the PA's criteria and request a waiver when appropriate, in this case a waiver request for the months to exhaust and utilization criteria. Frontier requests the commission instruct the PA to release the numbering resources necessary to meet the needs of this Frontier customer.

Frontier requests approval of this waiver request with an effective date of October 29, 2010. The Commission's waiver request must be submitted with the company's application to the PA for the numbering resources needed for deployment of service to this customer.

The following documents are attached as part of this request:

- Thousands-Block Application Form – Part 1A
- Appendix 3 Months-to-Exhaust and Utilization Report
- Denial from Neustar – Part 3
- Letter from customer dated September 1, 2010

All directives can be emailed, faxed or mailed directly to:

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
180 Sutter Street
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: Kevin.Gatchell@NeuStar.biz

Please copy me on any correspondence with Kevin.

Please notify Betty Erdahl upon receipt. Thank you for your assistance with this matter. If you have questions regarding this filing, please contact me at (425) 261-6380.

Very truly yours,



Lin Fogg
Manager – Regulatory/Legislative Affairs