

XO Communications Services, LLC

2637 Summit Avenue
Plano, TX 75074
972-578-6552
214-237-1404

February 28, 2012

Mr. David Danner
Secretary and Executive Director
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250
Re: Des Moines Rate Center Numbering Waiver
Dear Mr. Danner:

By this letter XO Communications Services, LLC is requesting a waiver of the utilization requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow PA/NeuStar, the Number Pooling Administrator, to assign a block(1000 TNs) that meets the needs of a specific XO Customer.

XO Communications is requesting 1000 consecutive numbers for a customer. There are 29 available blocks in the 509 NPA pooling inventory for the Spokane Rate Center. The 509 NPA is forecasted to exhaust in the 4th quarter of 2022. XO currently does not have 1000 consecutive numbers available. The customer is requesting a 509-xxx-6xxx block specifically for The Rockwood Clinic in the Spokane Rate Center. The numbers are required to support growth, the customer's new location and internal expansion in Spokane. There will be no returns of TNs due to the fact that the customer will be using all 1000 blocks. The numbers will be activated for the customer on the LERG effective date once it is received from Neustar. The original customer e-mail request has been provided with this letter as Confidential Document 2.

In our effort to satisfy the customer's request, XO Communications Services, LLC submitted a request to PA/NeuStar on February 7, 2012 for additional numbering resources. That Neustar request(application) has been provided as Confidential Document 3. Also the denial from Neustar has been provided as Confidential Document 4. Finally, the Months to Exhaust has been provided as Confidential Document 5. In order for the request to be approved, XO Communications Services, LLC will require a waiver of the current usage threshold for new numbering requests.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request for a block of numbers. The waiver process is specifically addressed in the FCC Third Report and Order (“Order”) as the “safety valve” process (See FCC 01-362, ¶¶ 57-66), which went into effect on March 14, 2002. The order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See ¶¶ 61, 66). XO Communications Services, LLC respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/NeuStar to accommodate our customer’s request.

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

Kevin Gatchell
PA Code Administrator
NeuStar, Inc.
1800 Sutter Street
Concord, CA 94520
Phone 925-363-8742
Fax: 925-363-7692
Email: Kevin, Gatchell@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact Marlon Brown at (972-578-6552 or Marlon.Brown@XO.com). Also Ruben Galvan at 972-578-3728 or Ruben.Galvan@XO.com We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,
Marlon Brown
Code Administration
XO Communications Services, LLC

972-578-6552