

“By this letter Comcast Phone of WA 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 numbering resources.

Specifically, the customer has requested 4500 numbers, in NPA NXX _____

Once the new blocks are assigned, the customer will begin transitioning to the new NPA/NXX blocks _____ within six months.

- a. The original customer request has been provided with this letter as **Confidential Attachment A** pursuant to WAC 480-07-160.
- b. The **360** NPA is forecasted to exhaust in 1-month. There are 0 unassigned NXXs in the 360 NPA.
- c. The Company will adhere to the requirement of reviewing number resources and comply with the requirements of the NANPA and the Pooling Administrator regarding the return of unused numbers.
- d. In our effort to satisfy the customer’s request, Comcast Phone of WA submitted a request to PA/Neustar on 11/22/16 for additional numbering resources. That application and the subsequent denial have been provided as Confidential **Attachment B** pursuant to WAC 480-07-160.

In order for the request to be approved, **Comcast Phone of WA** 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 large 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 commissions.

Comcast Phone of WA 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 assign 4500 numbers in the **360** NPA, **RIDGEFIELD** Rate Center to accommodate our customer’s request.