

February 15, 2001

**Mandatory Number Pooling Trial in Area Code 509  
Docket No. UT-991627**

**NOTICE OF OPPORTUNITY TO FILE INITIAL COMMENTS AND ANSWERS  
(Initial – March 1 , 2001, Answers - March 15, 2001)**

On December 1, 2000, the Washington Utilities and Transportation Commission ("WUTC") ordered all telecommunications companies with prefixes in rate centers serving the Spokane metropolitan statistical area and with switches capable of local number portability to implement a thousand-number block pooling trial by July 8, 2001.

On January 22, 2001, Qwest Corporation ("Qwest"), asked the WUTC to reconsider its order mandating number pooling or, in the alternative, to grant Qwest a waiver of its participation in the pooling trial.<sup>1</sup> In asking to be excused from the requirement to participate in the pooling trial, Qwest offered to take what it characterized as "extraordinary steps to ensure that it continues to utilize its available numbers efficiently."

The WUTC order requiring a number pooling trial and Qwest's petition are available from the WUTC records center or from the WUTC's web site at this address:

[wutc.wa.gov/telecom/numberpool](http://wutc.wa.gov/telecom/numberpool).

The WUTC seeks comments on the request of Qwest to be excused from the requirement to participate in number pooling. Commenters are encouraged to address any or all of the following points:

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<sup>1</sup> The WUTC notified Qwest by letter on February 15, 2001, that its request for reconsideration would not be acted upon. There is no procedure for reconsideration of an open meeting order, and Qwest's request was untimely.

1. The reasonableness of Qwest's estimates of its costs to participate in the 509 number pooling trial.
2. The effect of Qwest's participation in the 509 number pooling trial on the allocation to Washington state operations of cost to implement the modifications to Qwest's Operating Support Systems (OSS) and Service Control Points (SCP) across its operating territory.
3. The reasonableness of Qwest's estimates of the numbering resources (thousand-number blocks) that it would contribute to a number pooling trial.
4. The likely effect on the date at which the 509 area code would reach exhaustion if Qwest is permitted to obtain full prefixes (NXXs) instead of thousand-number blocks.
5. Any limitations on the WUTC's discretion arising from the delegation of authority under which the WUTC ordered number pooling, federal rules, or industry guidelines.
6. The feasibility of excluding from mandatory number pooling any telephone prefix assigned to any service provider, if that prefix has more than a specified utilization level, such as 60 percent or 75 percent.
7. Whether granting a waiver to Qwest would result in any undue competitive advantage to Qwest.
8. Whether, if the WUTC grants the waiver, it should include any conditions in addition to those proposed by Qwest.

**COMMENTS.** Initial comments are due in the WUTC offices no later than **March 1, 2001**. Answers are due no later than **March 15, 2001**. Please include a brief summary of your comments. Provide comments in electronic format via e-mail or on a 3-1/2 inch, IBM-formatted, high density disk, in .pdf Adobe Acrobat format, reflecting the pagination of your original. Please also send us the text in your choice of .doc (Word 97 or later) or .wpd (Wordperfect 6.0 or later), labeled with the docket number of this proceeding (UT-991627) and the commenter's name and type of software used. If unable to file electronically, commenters are asked, but not required, to file an original plus ten copies of their written comments. Comments may be provided by e-mail to <[records@wutc.wa.gov](mailto:records@wutc.wa.gov)>. Comments provided by mail or courier should be addressed to: Secretary, Washington Utilities and Transportation Commission, P.O. Box 7250, 1300 S. Evergreen Park Drive S.W., Olympia, WA 98504-7250. Commission Staff will post on the Commission's web site all comments provided in electronic format (with the exception of confidential information). The web site for this proceeding is [wutc.wa.gov/telecom/numberpool](http://wutc.wa.gov/telecom/numberpool).

The Commission will post and regularly update its web site to include information that pertains to this inquiry. Information will be provided to you individually if you request it. If you wish to receive further information on this issue you may either: (1) submit a written request, call the Commission's records center at (360) 664-1234, or (2) e-mail the commission at [records@wutc.wa.gov](mailto:records@wutc.wa.gov). When contacting the Commission, please refer to Docket No. UT-991627.

Sincerely,

CAROLE J. WASHBURN  
Secretary

**NOTICE**

**If you do not wish to comment at this time, but would like to receive future information about this inquiry, please notify the Commission Secretary by mail, e-mail, or telephone, as indicated above. Please request to be included on the Docket No. UT-991627 mailing list.**