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April 27, 2004

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket No. UT-031822

Dear Ms. Washburn:

Enclosed are the original and nineteen copies of a Request for Extension of Temporary Suspension of Wireline-to-Wireless Number Portability Obligations.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: Service List
James Brooks
John Coonan

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RECORDS MANAGEMENT

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Petition
Requesting Temporary Suspension
of Implementation of Number
Portability

UT-031822

INLAND TELEPHONE
COMPANY

REQUEST FOR EXTENSION OF
TEMPORARY SUSPENSION OF WIRELINE
TO WIRELESS NUMBER PORTABILITY
OBLIGATIONS

COMES NOW, Inland Telephone Company ("Company"), by and through its attorney of record, Richard A. Finnigan, attorney at law, and files this Request for Extension of Temporary Suspension of Wireline to Wireless Number Portability Obligations (the "Request") with the Washington Utilities and Transportation Commission (the "Commission").

REQUEST FOR EXTENSION OF TEMPORARY SUSPENSION

1. Pursuant to Section 251(f)(2) of the Communications Act of 1934, as amended (the

REQUEST FOR EXTENSION OF TEMPORARY
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS - 1

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1 “Act”¹ and the Commission’s January 28, 2004 Order No. 01 in this proceeding, the Company hereby
2 respectfully requests that the Commission extend the temporary suspension of the Company’s
3 individual obligations to provide number portability, as that term is defined by applicable law, to
4 requesting Commercial Mobile Radio Service (“CMRS”) providers. The Company was previously
5 granted a suspension by the Commission’s Order No. 01 in this proceeding. Granting this Request will
6 ensure that the public interest for wireline-to-wireless portability is properly served. In so doing,
7 prevent a technical unfeasibility and avoid adverse consequences to end users and the Company.
8

9 2. In issuing Order No. 01, the Commission found that the Company’s Petition provided an
10 adequate basis for temporarily suspending the Company’s obligations to comply with federal number
11 portability requirements.² Among the reasons stated in the Company’s Petition, and noted in the
12 Commission’s Order No. 01, was that the Company’s “central office switches serving its Dewatto,
13 Roslyn, Prescott, and Uniontown wire centers are not technically capable of providing local number
14 portability.”³ In reaching this conclusion, the Company determined that it would need to replace its
15 central office switches for those wire centers. The Company has a limited number of qualified
16 personnel to complete the replacement. Accordingly, the Commission approved a plan for sequential
17 installation of the new equipment.⁴
18

19 3. Subsequent to Order No. 01, the Company completed its comprehensive testing of its
20 preferred vendor’s replacement switch. However, it has now become apparent to the Company that the
21

22 ¹ See 47 U.S.C. § 251(f)(2).

23 ² Order No. 01 at ¶ 7.

24 ³ Order No. 01 at ¶ 5.

25 ⁴ Order No. 01 at ¶ 6 and 12.

1 vendor's equipment presents significant and insurmountable technical difficulties with regard to the
2 provision and implementation of equal access and CALEA, as well as local number portability. The
3 Company has attempted to resolve these issues with the vendor. However, it became apparent that the
4 vendor would not be able to solve the issues in a timely fashion. The Company terminated its
5 relationship with that vendor and has entered into a contract with a new vendor. Switch testing is
6 scheduled to begin in late June. However, the failure of the initial vendor to deliver a product that met
7 the required specifications, means the Company will not be able to meet the deadlines in order No. 1.
8

9 4. Accordingly, the Company respectfully requests that the Commission grant the
10 Company an extension of the deadlines for implementing local number portability in each of its wire
11 centers, including Dewatto (DWTOWAXADS0), Roslyn (RSLNWAXXCG0), Prescott
12 (PRSCWAXADS0), and Uniontown (UNTWXAXADS0). More specifically, the Company requests
13 that the Commission issue an order providing for the following revised schedule for local number
14 portability compliance:
15

16 Roslyn: from June 30, 2004 to December 31, 2004;

17 Dewatto: from December 31, 2004 to June 30, 2005; and

18 Prescott: from June 30, 2005 to December 31, 2005.

19 The Company believes that they can make the existing December 31, 2005 date for Uniontown.

20 5. Consistent with 47 U.S.C. § 251(f)(2), granting this Request will satisfy the
21 requirements of the Act. Specifically, the Commission is authorized to grant the Company's request if
22 the Commission determines that the extension of the suspension:
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24 (A) is necessary –

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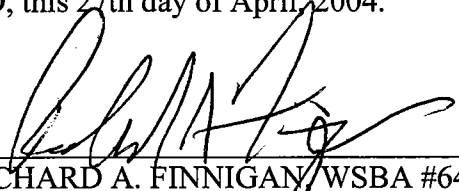
- (i) to avoid a significant adverse economic impact on users of telecommunications services generally;
- (ii) to avoid imposing a requirement that is unduly economically burdensome; or
- (iii) to avoid imposing a requirement that is technically infeasible; and

(B) is consistent with the public interest, convenience, and necessity.⁵

The Commission has already found that the criteria were satisfied for a temporary suspension when it issued Order No. 01.

6. Based on the foregoing, the Company respectfully requests that the Commission grant the Company extensions, as outlined above, of the schedule for complying with local number portability to CMRS providers for each of its wire centers.

RESPECTFULLY SUBMITTED, this 27th day of April, 2004.



RICHARD A. FINNIGAN/WSBA #6443
Attorney for Inland Telephone Company

⁵ 47 U.S.C. § 251(f)(2).

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CERTIFICATE OF SERVICE

UT-031822

I hereby certify that I have served on this day the attached Request for Extension of Temporary Suspension of Wireline-to-Wireless Number Portability Obligations to the following via U.S. mail:

Sally Johnston
Assistant Attorney General
PO Box 40128
Olympia, WA 98504
sjohnston@wutc.wa.gov

Simon Ffitch
Office of the Attorney General
900 4th Ave Ste 2000
Seattle, WA 98164
simonf@atg.wa.gov

Dated this 27th day of April, 2004.


Kathy McCrary