

July 26, 2017

Via email

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: Electric Lightwave, LLC dba Allstream Number Waiver Request for 564 NPA,
Vancouver Rate Center**

Dear Mr. King:

By this letter Electric Lightwave, LLC dba Allstream (“Allstream”) respectfully requests that the Washington Utilities and Transportation Commission (Commission) grant a waiver (Safety Valve Request) of the numbering exhaust 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 open and assign eight thousand (8000) sequential numbers that meet the needs of a specific customer. The customer request is provided in Confidential Attachment A pursuant to WAC-480-07-160. This document is confidential due to proprietary network information. A redacted Attachment A is also provided.

Specifically, the customer has requested eight consecutive blocks with the 564 NPA (564-397-1000 through 564-397-8999) to meet its dial plan requirements, four blocks which were approved, and four which were denied and can only be obtained via this waiver request. The customer anticipates returning all existing 360 NPA numbers once they have been transitioned to the new 564 NPA. In addition, Allstream has returned three uncontaminated blocks for the 360 NPA to pooling, in anticipation of this request.

Please note: The customer is returning a total of 2253 TNs, and of those, there are 15 blocks of TNs ranging in size from 5 TNs to 501 TNs. No 1000 blocks are being returned. In addition, 78 ported in TNs will be returned to the carrier of record after aging for 365 days. The additional TNs are to meet the customer’s expansion needs, and growth.

The 360 NPA is forecasted to exhaust in the 4th quarter of 2017. There are 15 unassigned NXXs in the 360 NPA and 14 Blocks available in the PA pool inventory for the Vancouver Rate Center.

NANPA does not currently have a forecast for the 564 NPA - NPA Exhaust is beyond 30 years. There are 777 unassigned NXXs in the 564 NPA and 2 Blocks available in the PA pool inventory for the Vancouver Rate Center.

In our effort to satisfy the customer's request, Allstream submitted a request to PA/Neustar on June 26, 2017 for additional numbering resources. Allstream is unable to meet the customer's request with its current inventory, but our pooling request was denied as we do not meet the Months to Exhaust requirements for four of the eight requested sequential blocks. Allstream's application and the subsequent denial have been provided as Attachment B pursuant to WAC 480-07-160. In order for the request to be approved, Allstream will require a waiver of the Months to Exhaust requirements (Attachment C).

The FCC allows for a waiver of the rules when there is a 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 commissioners.

Allstream respectfully requests that the Commission approve the request for a waiver of Months to Exhaust requirements, and direct PA/Neustar to assign 8000 sequential numbers in the 564 NPA Vancouver Rate Center to accommodate our customer's request.

Directives to the Pooling Administrator 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. Please contact me if you need additional information.

Sincerely,

/s/ Donna Heaston

Donna Heaston
Corporate Attorney
Phone: 763-745-8466
E-mail: donna.heaston@allstream.com

CC: Rebecca Beaton, Regulatory Services Division, Utilities and Transportation Commission
via email: rbeaton@utc.wa.gov