



February 25, 2010

**Mr. David Danner**  
**Executive Director & Secretary**  
**Washington Utilities and Transportation Commission**  
**1300 S. Evergreen Park Drive SW**  
**Olympia, Washington 98504**

Re: Tacoma Waverly rate center numbering waiver

Mr. Danner:

By this letter, AT&T is requesting a waiver of the utilization and months-to-exhaust thresholds outlined in the FCC's Numbering Resource Optimization Orders, FCD 00-429 and FCC 01-362, released in CC Docket NO. 99-200, to allow the Pooling Administrator (PA) /NeuStar, to assign blocks of numbers that meet the need of a specific AT&T customer.

The customer request is for 3000 sequential telephone numbers in the 253 NPA, in the Tacoma Waverly rate center. Specifically, the customer has requested the numbers to be in an NXX of the format 253- NX4 to facilitate integration into their 5-digit multi-state dialing plan. The customer will activate and use these numbers as soon as they are assigned. AT&T respectfully asks that the Washington Utilities and Transportation Commission to authorize NeuStar to assign blocks that would meet the customer's needs. NPA 253 is forecasted to exhaust in 4Q29. There are currently 378 available NXXs in NPA 253 and 17 blocks in the pool.

Over the course of the next 2 years, after the expansion and upgrade of their telecommunications network and the addition of other locations, the customer will be returning 890 numbers to AT&T, Verizon or QWEST. The customer's Letter of Intent (LOI) is provided as an attachment or Document 2 and additional questions are further addressed as an attachment or Document 3.

In our attempt to satisfy the customer's request, AT&T submitted a request to the PA/NeuStar on February 3, 2010 for these additional resources. The application and the subsequent denial are in Document 4. In order for the request to be approved, AT&T will require a waiver of the current usage and month-to-exhaust thresholds for numbering resources.

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 cannot be met. The waiver process is specifically addressed in the FCC Third Report and Order ("Order") as the "safety valve" process (See FCC 01-362, paras. 57-66), which was effective 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 Paras. 61, 66) .

AT&T respectfully requests that the Commission approve the request for a waiver of rate center utilization and months-to-exhaust and direct the PA/NeuStar to reserve and assign 3 blocks, in the 253 NPA, for the Tacoma rate center to accommodate the customer's request.

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

Mr. Kevin Gatchell  
NeuStar PA/Code Administrator  
1800 Sutter Street  
Concord, CA 94520  
Phone: 925-363-8742  
Fax: 925-363-7692  
Email: [Kevin.Gatchell@NeuStar.biz](mailto:Kevin.Gatchell@NeuStar.biz)

I would greatly appreciate being copied on any correspondence with Kevin.

Thank you for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

***Dale Morgenstern***

*AT&T - Network Regulatory  
Local Network Operations  
o: 908-234-5120  
c: 201-960-6668*

*Attachments*