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April 29, 2010

David Danner
Executive Director & Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

*Via Email to: records@utc.wa.gov
Hard copies via Overnight Delivery*

Re: Safety Valve Request and Request for Expedited Review & Waiver of Numbering Resource Guidelines

Dear Mr. Danner:

Integra Telecom of Washington, Inc. (Integra) is submitting a request for a waiver of the numbering exhaust requirements from the Washington Utilities and Transportation Commission (WUTC) in order to meet a request from

< confidential information redacted >

The Company respectfully requests that the Commission grant a waiver (Safety Valve Request) of the numbering administration guidelines so that it may request the return of a block which Integra had previously donated back to PAS. With this block, and the Company's existing number resources, Integra will be able to meet *< confidential information redacted >* request for a total of 1100 sequential numbers. In support of Integra's request, I am providing the following information:

- a copy of Integra's request to the Pooling Administrator, which includes the Administrator's system-generated response;
- a copy of *< confidential information redacted >* request for numbers; and
- Integra's utilization statistics.

In additional, Integra is providing responses to questions commonly asked by Staff in prior requests for numbering resources:

1. *Who is the customer?*
 - *< confidential information redacted >*

2. *How many numbers does the customer already have assigned to it by the company?*
 - From the Spokane rate center: 398; 1,703 total.
3. *What is the “actual” utilization of the assigned numbers by the customer?*
 - 99.9%; < **confidential information redacted** > is the end user and does not hold numbers for assignment.
4. *How many employees does the customer have?*
 - < **confidential information redacted** > employees in Washington State.
5. *Does the customer provide phone service to residences?*
 - No
6. *Does the customer provide space for other businesses?*
 - No.
7. *Does the customer project providing space for other businesses?*
 - No.
8. *Will the customer put all the numbers into service at once?*
 - Yes
9. *Integra’s number utilization information for its current Spokane number assignments.*
 - Please see the attached spreadsheet: WUTC 509 Utilization Forecast - Spokane.
10. *Please provide Staff with the date the company needs the numbers?*
 - As soon as available.
11. *State the number of blocks available in 509 Spokane rate center according to the NeuStar Pooling site.*
 - According to the Available Codes Report on the NANPA website, there are 143 codes to be activated (1430 blocks) for 509. The Available Blocks Report from the Pooling Administration website lists 34 blocks available for assignment for the Spokane rate center.
12. *State the projected exhaust date of the 509 NPA as shown on the NANPA website.*
 - According to the October 2009 NRUF and NPA Exhaust Analysis, the 509-NPA is projected for exhaust in 1st Quarter 2016.
13. *Verify that Integra does not provide residential telecommunications service.*

- Integra does not offer a residential class of service; it may, however, in rare cases, be providing business telecommunications services to home offices in otherwise residential neighborhoods.

Directives to the Pooling Administrator can be emailed, faxed or mailed directly to:

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
Phone: 925-363-8742
Fax: 925-363-7692
Email: kevin.gatchell@neustar.biz

Please contact the undersigned if you have any questions or concerns. Thank you for your attention to this matter.

Sincerely,

/s/ Jeanne Bell

Jeanne Bell
Number Administrator
Integra Telecom
Direct: 503-453-8279
Fax: 503-453-8284
Email: jeanne.bell@integratelecom.com

Attachments

cc: Betty Erdahl, WUTC Staff, via email: berdahl@utc.wa.gov
Cathy Murray, Manager, Regulatory Affairs, Integra Telecom