



July 26, 2017

Mr. Steven King
Washington Utilities and
Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504-7250

Re: Numbering waiver for [REDACTED]

Dear Mr. King,

Frontier Communications Northwest Inc. requests the Washington Utilities and Transportation Commission to direct the Pooling Administrator (PA) to provide Frontier with two, ten thousand number blocks or twenty, one thousand number blocks to satisfy the requirement for additional numbers for [REDACTED] to service their facility from our Juanita, WA switch; JUNTWAXADS0, rate center Kirkland.

The customer requests two, 10,000 thousand number or 20, 1,000 blocks because they have run out of numbers due to their rapid growth and implementation of new technology. [REDACTED] is one of the [REDACTED] in the region. Their facilities include: [REDACTED]

[REDACTED]. The organization will be adding [REDACTED]. This technology requires a [REDACTED]. Each DID to access this new technology. In addition to these [REDACTED] also necessitates this large request.

According to the NANP and PA, the 425 NPA is forecasted to exhaust in the fourth quarter 2022 and there are 38 unassigned NXXs (codes) in the 425 NPA for the Kirkland Rate Center.

The Frontier customer is requesting the DID's to originate from the main campus. The customer is fine utilizing the new 564 NPA overlay if the UTC is willing to assign sequential blocks within the new code. The number restriction are [REDACTED].

The waiver request is made because Frontier's request for additional numbering resources was denied by the PA because the serving central office does not meet the MTE and/or Utilization requirements. The PA requires the "months to exhaust" be less than or equal to six (6) months and the serving central office is currently at 64.879 months. Also, the percent utilization is currently at 41.666%; less than the 75% utilization required by the FCC.

The Washington Commission has the authority to review the PA's criteria and request a waiver when appropriate, in this case a waiver request for the months to exhaust and utilization criteria. Frontier requests the commission instruct the PA to release the numbering resources necessary to meet the needs of this Frontier customer.

Currently, Frontier has in inventory the following resources in the NPA in our inventory: 425-814,820,821,823,825,425-376,497,498,538,556,558,576,580,702,704,708,727,739,755,803,822,827,828,836,861,867,868,869,881,882,883,885,889,893,895,898,899,936.

The customer currently has assigned number blocks in the 425 NPA, Kirkland rate center and will return 6,000 DIDs within 6 months from 425-899-XXXX to Frontier after the new assignment is made. Frontier will return any unused blocks to the PA in compliance with requirements. This is within the six months assignment timeline as required by the FCC.

In our effort to satisfy this request, Frontier submitted a request to PA/Neustar on July 26, 2017 (revised from the original request dated January 4, 2017) for additional numbering resources.

The application and the subsequent denial have been provided as Confidential Attachment B pursuant to WAC 480-07-160. In order for the request to be approved, Frontier will require a waiver of the current usage threshold for new numbering requests. The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request with evidence for a large block of numbers or to establish an LRN. 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.

Frontier respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/Neustar to assign twenty blocks from either an existing or new code in the 425 NPA or the new 564 code, Kirkland Rate Center to accommodate the customer's request for new technology, security, growth and expanded services. All numbering resources will be used in the rate center assigned.

The following documents are attached as part of this request:

- Months-to-Exhaust and Utilization Report
- Thousands-Blocks Application Form
- Denial from Neustar
- Letter from customer dated July 21, 2017

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

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
180 Sutter Street
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692

Email: Kevin.Gatchell@NeuStar.biz

Please copy me on any correspondence with Mr. Gatchell.

Thank you for your assistance with this matter. If you have any questions regarding this filing, please contact me at 360-367-9144.

Sincerely,

A handwritten signature in black ink that reads "Cathy Dahlquist". The signature is written in a cursive, flowing style.

Cathy Dahlquist
Manager – Government and External Affairs

Attachments

cc: Jing Roth
Tim Zawislek