



March 1, 2018

Steven V. King  
Executive Director & Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, Washington 98504-7250

RE: Request of Asotin Telephone Co. for expedited review of NeuStar Pooling Administrator's Final  
of Application for Numbering Resources

Dear Mr. King,

Asotin Telephone Co. (aka TDS Telecom) intends to install a state of the art switching system in  
Asotin, WA which will replace our legacy switch. In order to conduct an orderly transition to this  
new platform TDS Telecom requires the use of numbering resources, specifically a "Local Routing  
Number" (LRN) that will allow the new switch to coexist with the legacy equipment. Once the  
transition is complete, TDS intends to return this new code to the NANPA pool for reuse elsewhere  
in the state.

Today, we do not meet the NANPA utilization guidelines needed to obtain a new LRN in Asotin,  
WA and we are requesting a state waiver from the commission. TDS Telecom is committing to  
return the LRN and all associated number blocks to NANPA once we have completed our full  
customer migration and decommission the legacy switch. After which time TDS Telecom will return  
this new code to NeuStar and the number pooling administrator. TDS Telecom is anticipating the  
full migration and decommission of the legacy switch within 3 years of implementation of the new  
switch. If unforeseen circumstances arise and TDS Telecom does not meet this deadline we will  
request an extension from the Washington Utilities and Transportation Commission.

TDS has reviewed the numbering resources assigned within the Asotin, WA rate center and the only  
existing code is assigned to TDS and is being utilized within our legacy switch. Since there are not  
any other NXXs assigned to Asotin, WA we are requesting to have a new NXX assigned. TDS  
Telecom is requesting a single block from a new NXX be assigned to establish a LRN and test  
number. TDS Telecom will protect all other numbers from this block and work with the WA UTC  
and PA to protect the other nine blocks being donated to the pool, so a smooth relinquishment of the  
NPA-NXX can happen when our legacy switch is decommissioned. This will prevent other blocks  
from being assigned to other carriers within the Asotin, WA rate center and will help ensure the  
code can be re-purposed in the future within the geographic area served by the 509 NPA.

This installation represents a significant investment in Washington and we hope the commission will  
support these investments by granting this waiver request.

Thank you for your assistance in this matter, please do not hesitate to contact me with any questions  
or further requirements.

Sincerely,

/s/ Paul Nejedlo

Paul Nejedlo  
Sr. Administrator, Number Management

Enclosures

Received  
Records Management  
03/22/18 15:59  
State of WASH.  
UTIL. AND TRANSP.  
COMMISSION