



June 30, 2015

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 Confluence Health

Dear Mr. King,

Frontier Communications Northwest Inc. requests the Washington Utilities and Transportation Commission to direct the Pooling Administrator (PA) to provide Frontier with five one thousand number blocks to satisfy the requirement for additional numbers for Confluence Health located in Wenatchee, WA in the Wenatchee Rate Center, WENATCHEE switch WNTCWAXXCG0.

The customer requests five one thousand number blocks to support its merging and expanding healthcare system inclusive of a hospital and the purchase of local clinics in the Wenatchee area. The healthcare system currently uses numbers within the 503-662,663,664,665,667 NPA/NXXs.

The customer is requesting that consecutive numbers be applied to all of their properties. Confluence Health intends to relinquish their existing 550 numbers to Frontier Communications. Frontier Communications would evaluate and return any additional resources. All of the numbers requested for this customer used in the rate center, will be assigned and put in-service immediately.

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 six (6) "months to exhaust" or utilization criteria. The PA requires the "months to exhaust" be less than or equal to six (6) months and the serving central office is currently at 19.5 months. Also, the percent utilization is currently at 60.346%; less than the 75% utilization required by the FCC. The projected exhaust of NPA 509 is the 3rd quarter of 2028.

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.

The Commission's waiver request must be submitted with the company's application to the PA for the numbering resources needed for deployment of service to this customer.

The following documents are attached as part of this request:

- Thousands-Blocks Application Form
- Months-to-Exhaust and Utilization Report
- Denial from Neustar
- Letter from customer dated June 15, 2015

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: 952-363-7692
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,



Cathy Dahlquist
Manager – Government and External Affairs

Attachments

cc: Betty Erdhal
Bill Weinman