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December 17, 2004

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

RECEIVED
RECORDS MANAGEMENT
04 DEC 17 PM 3:59
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket No. UT-031822

Dear Ms. Washburn:

Enclosed are the original and nineteen copies of a Request for Extension of Temporary Suspension of Wireline-to-Wireless Number Portability Obligations.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: Service List
James Brooks
John Coonan

RECEIVED
RECORDS MANAGEMENT
04 DEC 17 PM 3:59
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Petition
Requesting Temporary Suspension
of Implementation of Number
Portability

UT-031822

INLAND TELEPHONE
COMPANY

REQUEST FOR EXTENSION OF
TEMPORARY SUSPENSION OF WIRELINE
TO WIRELESS NUMBER PORTABILITY
OBLIGATIONS

COMES NOW, Inland Telephone Company (“Company”), by and through its attorney of record, Richard A. Finnigan, attorney at law, and files this Request for Extension of Temporary Suspension of Wireline to Wireless Number Portability Obligations (the “Request”) with the Washington Utilities and Transportation Commission (the “Commission”).

REQUEST FOR EXTENSION OF TEMPORARY SUSPENSION

1. Pursuant to Section 251(f)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and the Commission’s January 28, 2004 Order No. 01 in this proceeding, the Company hereby respectfully requests that the Commission extend the temporary suspension of the Company’s

¹ See 47 U.S.C. § 251(f)(2).

REQUEST FOR EXTENSION OF TEMPORARY
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS - 1

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1 individual obligations to provide number portability, as that term is defined by applicable law, to
2 requesting Commercial Mobile Radio Service ("CMRS") providers. The Company was previously
3 granted a suspension by the Commission's Order No. 01 in this proceeding.

4 As described below, the original schedule was extended by the Commission's Order No. 02 in
5 this proceeding. The subsequent deadline for the first conversion is December 31, 2004.

6
7 2. In issuing Order No. 01, the Commission found that the Company's Petition provided an
8 adequate basis for temporarily suspending the Company's obligations to comply with federal number
9 portability requirements.² Among the reasons stated in the Company's Petition, and noted in the
10 Commission's Order No. 01, was that the Company's "central office switches serving its Dewatto,
11 Roslyn, Prescott, and Uniontown wire centers are not technically capable of providing local number
12 portability."³ In reaching this conclusion, the Company determined that it would need to replace its
13 central office switches for those wire centers. The Company has a limited number of qualified
14 personnel to complete the replacement. Accordingly, the Commission approved a plan for sequential
15 installation of the new equipment.⁴
16

17 3. Subsequent to Order No. 01, the Company completed its comprehensive testing of its
18 preferred vendor's replacement switch. However, it became apparent to the Company that the
19 vendor's equipment presented significant and insurmountable technical difficulties with regard to the
20 provision and implementation of equal access and CALEA, as well as local number portability. The
21

22
23 ² Order No. 01 at ¶ 7.

24 ³ Order No. 01 at ¶ 5.

25 ⁴ Order No. 01 at ¶ 6 and 12.

1 Company attempted to resolve these issues with the vendor. However, it became apparent that the
2 vendor would not be able to solve the issues in a timely fashion. The Company terminated its
3 relationship with that vendor and entered into a contract with a new vendor. Since the granting of
4 Order No. 02, the Company has been working diligently with the second vendor to install the switch.
5 However, there have been unforeseen delays. The Company is close to being able to implement switch
6 conversion, but will not be able to accomplish that switch conversion by December 31, 2004.
7

8 4. Accordingly, the Company respectfully requests that the Commission grant the
9 Company an extension of the deadline for implementing local number portability in the Roslyn wire
10 center (RSLNWAXXCG0). The remainder of the schedule set forth in Order No. 02 for Dewatto,
11 Prescott and Uniontown, in the Company's opinion at the present time, can remain the same. More
12 specifically, the Company requests that the Commission issue an order for the following revised
13 schedule for local number portability compliance: Roslyn: from December 31, 2004 to March 31,
14 2005. The remainder of the schedule as adopted in Order No. 02 should remain the same given what is
15 known at the present time.
16

17 5. Consistent with 47 U.S.C. § 251(f)(2), granting this Request will satisfy the
18 requirements of the Act. Specifically, the Commission is authorized to grant the Company's request if
19 the Commission determines that the extension of the suspension:

20 (A) is necessary –

21 (i) to avoid a significant adverse economic impact on users of
22 telecommunications services generally;

23 (ii) to avoid imposing a requirement that is unduly economically
24

1 burdensome; or

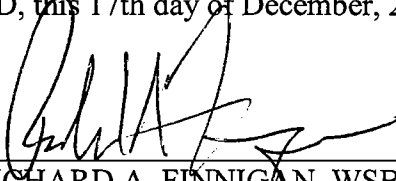
2 (iii) to avoid imposing a requirement that is technically infeasible; and

3 (B) is consistent with the public interest, convenience, and necessity.⁵

4 The Commission has already found that the criteria were satisfied for a temporary suspension
5 when it issued Order No. 01.

6 6. Based on the foregoing, the Company respectfully requests that the Commission grant
7 the Company extensions, as outlined above, of the schedule for complying with local number
8 portability to CMRS providers for each of its wire centers.
9

10
11 RESPECTFULLY SUBMITTED, this 17th day of December, 2004.

12
13 
14 _____
15 RICHARD A. FINNIGAN, WSBA #6443
16 Attorney for Inland Telephone Company

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19
20
21
22
23
24 ⁵ 47 U.S.C. § 251(f)(2).

1 **CERTIFICATE OF SERVICE**

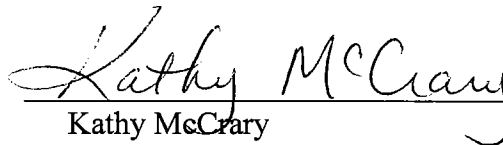
2 **UT-031822**

3 I hereby certify that I have served on this day the attached Request for Extension of Temporary
4 Suspension of Wireline-to-Wireless Number Portability Obligations to the following via U.S. mail:

5 Sally Johnston
6 Assistant Attorney General
7 PO Box 40128
8 Olympia, WA 98504
9 sjohnston@wutc.wa.gov

Simon Ffitch
Office of the Attorney General
900 4th Ave Ste 2000
Seattle, WA 98164
simonf@atg.wa.gov

10 Dated this 17th day of December, 2004.

11 
12
13 Kathy McCrary