



---

1201 NE Lloyd Boulevard - Suite 500 - Portland - Oregon - 97232  
PHONE: 503.453.8000  
FAX: 503.453.8221

May 31, 2011

**Confidential per WAC 480-07-160**

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 Mukilteo School District for 3 blocks; a total of 2500 telephone numbers. Mukilteo SD is requesting the numbers so that they can populate all of the school buildings with new DIDs and organize their telephone numbering. Mukilteo SD reviewed WUTC staff request that they consider taking 3 contaminated blocks from the existing Everett Rate Center inventory; regretfully they had to reject the 'contaminated' blocks of DIDs, some of the contaminated numbers in blocks are ones designated for assignment as part of their dial plan re-organization.

The Company respectfully requests that the Commission grant a waiver (Safety Valve Request) of the numbering administration guidelines and allow the opening of a new code so that it may request from PAS 3 blocks to meet Mukilteo School District's request. 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 Mukilteo School District 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?*
  - Mukilteo School District
2. *How many numbers does the customer already have assigned to it by the company?*

- From the Everett rate center: 542 total.
3. *What is the "actual" utilization of the assigned numbers by the customer?*
    - 99.9%; Mukilteo SD is the end user and does not hold numbers for assignment.
  4. *How many employees does the customer have?*
    - Mukilteo SD has 1600 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 Everett number assignments.*
    - Please see the attached spreadsheet: 02\_2011 WUTC 425 Utilization Forecast - Everett.
  10. *Please provide Staff with the date the company needs the numbers?*
    - July 01, 2011.
  11. *State the number of blocks available in 425 Everett rate center according to the NeuStar Pooling site.*
    - The Available Blocks Report from the Pooling Administration website lists 53 blocks available for assignment for the Everett rate center.
  12. *State the projected exhaust date of the 425 NPA as shown on the NANPA website.*
    - According to the 2011-1 NRUF and NPA Exhaust Analysis, the 425-NPA is projected for exhaust in 3rd Quarter 2032.
  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](mailto: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](mailto:jeanne.bell@integratelecom.com)

Attachments

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