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May 31, 2011

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 < *confidential information redacted* > for 3 blocks; a total of 2500 telephone numbers. < *confidential information redacted* > is requesting the numbers so that they can populate all of the school buildings with new DIDs and organize their telephone numbering. < *confidential information redacted* > 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 < *confidential information redacted* > 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 < *confidential information redacted* > 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?*
  - *< confidential information redacted >*
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%; *< confidential information redacted >* is the end user and does not hold numbers for assignment.
4. *How many employees does the customer have?*
  - *< confidential information redacted >* 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