

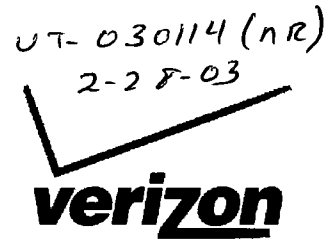
Joan Gage
State Manager – Regulatory Affairs

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

January 28, 2003



Verizon Northwest Inc.
1800 41st Street
P.O. Box 1003
Everett, Washington 98201
Mailcode: WA0101RA

Phone 425 261-5238
Fax 425 261-5262

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Subject: Northshore School District Number Request

Dear Ms. Washburn:

Verizon Northwest Inc. (Verizon) requests the Washington Utilities & Transportation Commission to direct the Pooling Administrator (PA) to provide Verizon with three uncontaminated 1,000 number blocks to satisfy the request of the Northshore School District in Bothell, Washington.

Northshore School District, a Verizon customer, has requested 3,000 sequential telephone numbers to meet their calling needs, to support a simplified dialing plan and to function with the new phone systems being installed for the entire school district. The customer is specifically requesting numbers in the range of 425-908-4000 through 6999. This specific range of numbers is needed to support their simplified dialing plan.

On or about January 7, 2003, Verizon submitted a Thousands Block Application Form Part 1A to the Pooling Administrator (PA) for the assignment of three thousands blocks necessary to meet the customer's request. A copy of this application is attached as Attachment A. Verizon completed the application in accordance with the Thousands - Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust Certification, which is attached as Attachment B.

Verizon submitted the request for new blocks because Verizon does not have 3,000 sequential numbers available within the Bothell central office to meet this customer's needs. Additionally, Verizon does not have available numbers in its existing inventory from another switch within the rate center to satisfy this request.

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On, or about January 7, 2003, the PA, via the Pooling Administration System (PAS), denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria set forth in the Thousands – Block Number (NXX-X) Pooling Administration Guidelines. This decision was made despite the fact that Verizon does not have the numbering resources needed to satisfy its customer's demand in the switch at issue. This decision, provided by the PAS system, is attached as Attachment C.

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, the PA looks at the number of months to exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket states that a carrier "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Also, paragraph 64 indicates that "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." The Washington Commission thus has the authority to review the PA's decisions and reverse them when appropriate.

Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need. The PA's denial of numbering resources also interferes with Verizon's ability to serve this customer.

Verizon requests that the Commission instruct the PA to release the numbering resources necessary to meet the needs of the Northshore School District.

Please do not hesitate to call me if you have any questions.

Very truly yours,



Joan Gage

State Manager – Regulatory Affairs

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Attachments

Tracking Number: _____

Attachment A

Thousands-Block Application Form
Part 1A

Type of Application: (Check one) New Change¹ Delete

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: VERIZON
Contact Name: CATHY FINNEY
Address: 2094 MCGEE LANE
City, State, Zip: LEWISVILLE, TX 75077
Phone: 9723185333 Fax: 972-317-2161
E-Mail: CATHY.FINNEY@VERIZON.COM

Pooling Administrator²:

Contact Name: KEVIN GATCHELL
Address: 1800 SUTTER STREET SUITE 570
City, State, Zip: CONCORD, CA 94520
Phone: 925-363-8742 Fax: 925-363-7692
E-Mail: KEVIN.GATCHELL@NEUSTAR.BIZ

1.2 General Information

1.2A Required when a thousands-block is needed for an LRN

This section applies if the applicant is requesting a thousands-block for an LRN which will make the applicant the LERG Assignee. The LERG Assignee responsibilities are listed in Section 4.2 of the Thousands-Block (NXX-X) Number Pooling Administration Guidelines (INC 99-0127-023).

NPA: _____ LATA: _____ OCN³: _____ AOCN: _____
Number of Thousands-Blocks Requested: _____ Number of Full NXXs Requested: _____

Switch Identification (Switching Entity/POI)⁴: _____ City or Wire Center Name: _____
Rate Center⁵: _____ Rate Center Sub Zone: _____
Homing Tandem Operating Company⁶: _____ Tandem Homing CLLI^{TM/7}: _____
Route same as NPA _____ NXX-X _____ Use Same Rate Center as NPA _____ NXX _____

1.2B Required when no LRN is needed

NPA: 425 LATA: 674 OCN: 4324 AOCN: 0772
Number of Thousands-Blocks Requested: 3 Number of Full NXXs Requested: 0

Rate Center: BOTHELL
Switch Identification (switching Entity/POI)⁸: BOTHWAXBDS1

1.3 Dates

Date of Application⁹: 01/07/2003 Requested Block Effective Date: 02/04/2003
Request Expedited Treatment? (See Section 9.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)
- b) Type of service: EOC / POTS
- c) Is certification or authorization required? Yes X No _____
If No, explain: _____
- d) Does your company have certification? Yes X No _____

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
 (Worksheet to be used for Requests for Additional Codes for Growth)

Date: 01/07/03 Company Name: VERIZON

Rate Center: BOTHELL

NPA(s)-NXXs included in growth calculation²: 425-288 352 398 402 415 424 481 482 483 485 486 487 488 489 788 806 844 908

Signature of Authorized Representative of Code Applicant: _____

Title: SPECIALIST - SERV INV Telephone No.: 9723185333 FAX No.: 972-317-2161

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 16317

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
B. Previous 6-month growth history ⁴	<u>-496</u>	<u>46</u>	<u>131</u>	<u>85</u>	<u>-233</u>	<u>1478</u>						
C. Forecast - Next months 1-12 ⁵	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): 268

E. Months to Exhaust⁶ = Telephone Numbers (TNs) Available for Assignment (A) = 61
Average Monthly Forecast (D)

F. Utilization Level⁷ = Telephone Numbers (TNs) Assigned X 100 = 84%

Total Numbering Resources in Applicant's Inventory

Explanation:

- 1 A copy of this worksheet is required to be submitted to the Code Administrator, for audit purposes, it must be in the applicant's files.
- 2 Report on all resources for the requested geographic area, including newly acquired codes.
- 3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.
- 4 Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
- 5 Forecast of TNs needed in each following month, starting with the most recent month as Month #1. In a jeopardy situation, only 6 months growth projection is required.
- 6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).
- 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).


Pooling Administration System - Netscape

File Edit View Go Communicator Help

Back Forward Reload Home Search Netscape Print Security Shop Stop

Bookmarks Location: https://www.nationalpooling.com/pas/frames-index.jsp

Instant Message WebMail Radio People Yellow Pages Download Calendar Channels RealOne Player



NEU STAR

- Request For Resources
 - New
 - Modify
 - Disconnect
 - Block Transfer
- Current Block(s) in Service (Part 4)
- Search Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports

Pooling Administration System

jgardner (SP) Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Question? E-mail us
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