

UT-041226 (NR)
7-28-04



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STATE OF WASH
UTIL. AND TRANSPORTATION
COMMISSION

Verizon Northwest Inc.
1600 41st Street
P.O. Box 1003
Everett, Washington 98201
Mailcode: WAD1D1RA

Phone 425 261-6380
Fax 425 261-6262

Lin Fogg
Specialist - Regulatory

July 8, 2004

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

Subject: **VERIZON REQUEST FOR NUMBER CODE**

Dear Ms. Washburn:

Verizon Northwest Inc. (Verizon) requests the Washington Utilities and Transportation Commission to direct the Pooling Administrator (PA) to provide Verizon with one ten thousand number code to satisfy the requirement for a new NXX in the Seattle Rate Center. This new code will be used to provision service to Verizon's near out of franchise customers for voice services. The new NXX is requested for several reasons; 1) these customers will be served via a gateway that will connect Verizon's in-franchise Mt. Vernon Central Office with Verizon's near out of franchise facilities located in Seattle, 2) the new switch requires a separate NXX because it is a different technology from the SESS switch that is currently used to provision service to the existing Verizon NPA NXX in the Seattle Rate Center and 3) Verizon has a requirement to track the traffic associated with the out of franchise operation separate from the in- franchise facility and a separate NXX will provide that capability.

On or about June 23, 2004 Verizon submitted an application to the PA for an out of franchise code. A copy of this application is attached as Attachment A. Verizon completed the application (See Attachment A) in accordance with the Thousands -Block Number (NXX-X) Pooling Administration Guidelines and the necessary Months to Exhaust Certification (See Attachment B).

Ms. Carole J. Washburn
July 8, 2004
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On or about June 29, 2004, 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, notwithstanding the fact that Verizon does not have the numbering resources needed to satisfy the requirements for the new switch. This decision provided by the PAS system is attached as Attachment C.

The Washington Commission has the authority to review the PA's decision and reverse them when appropriate.

Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision violated 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, and the PA's denial of numbering resources interferes with Verizon's ability to serve customers in the near out of franchise area. The PA has stated in their denial notice that the state commission must provide a waiver request for the months to exhaust criteria.

Verizon requests that the Commission instruct the PA to release the numbering resources necessary to meet the needs of Verizon's new switch.

Verizon also requests approval of this request on less than statutory notice with a requested effective date of July 29, 2004. The Commission's waiver request must be submitted with the company's reapplication to PA for the numbering resources needed for deployment of service to customers. In order to avoid further delay in obtaining the required numbers from the PA, the company will need to reapply as soon as possible.

Please call me if you have any questions.

Very truly yours,



Lin Fogg
Specialist · Public Policy and External Affairs

Attachments

Central Office Code (NXX) Assignment Request - Part 1
Revised September 24, 2001

Attachment A

Request ID #: 345890
Type of Application: New Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: VERIZON NORTHWEST INC.-WA
Headquarters Address: 1 E. Pratt St. SE
City, State, Zip: Baltimore, MD 21202
Contact Name: Robert F. Gomer Jr.
Contact Address: 1 E. Pratt St. SE11
City, State, Zip: Baltimore, MD 21202
Phone: 410-736-8797 FAX: 410-736-6647

E-Mail: RF38450@bellatlantic.com

Code Administrator:

Name: Kevin Gatchell
Address: 1800 Sutter St.
City, State, Zip: Concord, CA 94520
Phone: 925-363-8742 FAX: 925-363-8761

1.2 NPA: 206 NXX: _____ LATA: 674 OCN: 7993 Parent Company's OCN(s) - NONE

Switching Identification (switching Entity/POI): BTOWAJMPSA
Locality/City/Wire Center: SEATTLE Rate Center: SEATTLE

Homing Tandem Operating Co. VERIZON Tandem Homing CLL: EVRTWAXA03T

1.3 Dates: Date of Application: 06/23/2004 Requested Effective Date: 08/31/2004

1.4 Type of Company/Entity Requesting The Code:

- a) LEC (LEC, IC, CMRS, Other)
- b) Type of service (e.g., Cellular - Type 2) G.O. CODE
- c) Code Assignment Preference (Optional) _____
- d) Codes that are undesirable, if any _____
- e) Type of Change: _____

1.5 Type of request (Initial, growth, etc.): Additional Code For Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days.

If a growth code, attach months to exhaust worksheet.

Pool Indicator _____ (YES)

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain):

THIS IS A REQUEST FOR AN OUT OF FRANCHISE CODE W/
A NEW VOICE OVER IP SWITCH; ALSO REQUESTING AN
LRN FOR IT IN THE SEATTLE RATE CENTER.

1.8 Part 2 is attached Part 2 is not attached for RDBS & BRIDS

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/cic/ncf/ncdocs.htm>) as of the date of this application.

Robert F. Gomer Jr. Code Administrator 06/23/2004
Signature of Code Applicant Title Date

View Block Request Forms

Attachment B

Pooling Administration System

robert.f.comer,jr@verizon.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Block Applicant:

Name of Block Applicant **Comer F Robert**

Title user

Telephone Number (410) 736-6797

Fax Number (410) 736-6647

E-Mail robert.f.comer,jr@verizon.com

Date 06/25/2004

OCN 7993

Rate Center **SEATTLE**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

206-221, 206-404, 206-520, 206-543, 206-616, 206-885, 206-754, 206-897, 206-934

A. Available Numbers **3883**

B. Assigned Numbers **86116**

C. Total Numbering Resources **90000**

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation

List excluded Code(s) or Block(s)

E Growth History - Previous 6 months

Month 1	-987	Month 2	0
Month 3	0	Month 4	0
Month 5	0	Month 6	-38

F. Forecast - Next 12 months

Month 1	1	Month 2	1
Month 3	1	Month 4	1
Month 5	1	Month 6	1
Month 7	1	Month 8	1
Month 9	1	Month 10	1
Month 11	1	Month 12	1

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **1**

H. Months to Exhaust (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested
1

A. Available Numbers
3883

H. Months to Exhaust
3883.000

View Block Request Forms

Attachment B

95.584

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) = 100

Explanation

THIS IS A REQUEST FOR AN OUT OF FRANCHISE CODE/BLOCK W/ A NEW VOICE OVER IP SWITCH; ALSO REQUESTING AN LRN FOR IT IN THE SEATTLE RATE CENTER.

Back Print

Attachment C

Pooling Administration System

robert.f.comer.jr@verizon.com (SP)

Sign Out

Pooling Administrator's Response/Confirmation Part 3

Tracking Number 206-SEATTLE-WA-102315

Date of Application 06/25/2004

Block Effective Date

Date of Receipt 06/25/2004

Date of Response 06/29/2004

Service Provider Name Verizon

(Telcordia™ LERG™ Routing Guide) OCN 7883-VERIZON NORTHWEST INC.-WA

NPAC SOA SPID 0

Pooling Administrator Contact Information :

Name Tara Farquhar

Phone 9253637654

Fax 9253637695

E-Mail tara.farquhar@neustar.com

Response

NPA-NXX-X 0-0-0

Block Assigned
Block Disconnected

Block Contaminated (Yes or No)

Block Allocation Date

Switch Identification (Switching Entity / POI) attowajmpea

Rate Center SEATTLE

Rate Center Sub Zone seattle

X Form Complete, block requested denied
Explanation :

DR-3: No documentation to support the State Waiver request was received. Please resubmit your request with documentation supporting the State Waiver.

Assignment activity suspended by the administrator
Explanation :

Further Action :

Remarks :