

UT-061448 (AR)
9-27-06



Integra Telecom, Inc.

1201 NE Lloyd Blvd.
Suite 500
Portland, OR 97232
Phone: 503.453.8000

September 6, 2006

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

RECEIVED
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COMMUNICATIONS SECTION

Dear Ms. Washburn:

Integra Telecom of Washington, Inc. (Integra) respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Integra's Bothell rate center.

Integra is requesting from NeuStar/PA, the Washington number pooling administrator, to open 1,000 numbers out of Integra's KENTWAAUDS0 switch. Integra customer, Northshore School District, requests 1 block of 1,000 consecutive numbers out of the 425 NPA in the same NXX. Integra examined all available phone numbers in all of its switches and determined that it cannot meet the customer's criteria. Therefore, pending availability, Integra wants to request 425-408-7 for this customer.

On 9/6/2006 Integra completed Part 1A and MTE (Months to Exhaust) Worksheet to the NeuStar/PA via their online system in an effort to request a block of 1,000 numbers to satisfy the customer. According to FCC requirements to qualify for additional numbering resources, carriers must submit paperwork demonstrating that the rate center for which the numbers are requested is at six months or less to exhaust and is at 75% or more utilization. In cases where the service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions have jurisdiction. The Bothell rate center is at approximately 4.8 months to exhaust and at 67.4% utilization; therefore, Integra does not qualify for additional numbers at this time.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as we are requesting. *FCC Docket No. 99-200, Order No. 00-429, paragraph 186, released December 29, 2000.* The FCC then delegated authority to the State Commissions to grant request for additional



numbering resources in its Third Report and Order on Numbering Resource Optimization:

...we delegate authority to state commissions to hear claims that safety valve should be applied when the NANPA or Pooling Administrator denied a specific request for numbering resources (footnote omitted)... We also clarify that states may grant request by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

This request asks for Commission consideration based upon paragraphs 61 and 64 of Order No. 01-362 relating to a specific customer request. This need is demonstrated by the customer's request, along with current proof of utilization in the Bothell rate center.

Integra respectfully requests that the Washington Utilities and Transportation Commission direct NeuStar/PA to provide 1,000 numbers to be provisioned out of the KENTWAAUDS0 switch. Integra also requests Staff to contact NeuStar to reserve 425-408-7, pending Commission approval.

The directive for the numbers should be mailed to:

Mr. Kevin Gatchell
1800 Sutter St., Suite 780
Concord, CA 94520
Phone: 925-363-8742
Email: kevin.gatchell@neustar.biz

Thank you for your consideration in this matter. I would appreciate an expeditious decision relating to this request.

Sincerely,

A handwritten signature in cursive script that reads "Roxanne Richards".

Roxanne Richards
Numbering Administrator
Integra Telecom of Washington, Inc.

Attachments : PAS MTE and Utilization Worksheet
Letter from Northshore School District

Pooling Administration System

🏠 roxanne.richards@integratelecom.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Wednesday, September 6, 2006**

OCN **4131**

Company Name **INTEGRA TELECOM WA**

Rate Center **BOTHELL**

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

425-368-0-2, 4; 425-408-4, 5, 6, 9

Name of Block Applicant **Ms ROXANNE F RICHARDS**

Title **Capacity Planner III**

Telephone Number **(503) 453-8597**

Fax Number **(503) 453-8793**

E-Mail **roxanne.richards@integratelecom.com**

A. Available Numbers *

B. Assigned Numbers *

C. Total Numbering Resources *

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 months² *

Month 1	<input style="width: 80%;" type="text" value="58"/>	Month 2	<input style="width: 80%;" type="text" value="7"/>
Month 3	<input style="width: 80%;" type="text" value="3"/>	Month 4	<input style="width: 80%;" type="text" value="13"/>
Month 5	<input style="width: 80%;" type="text" value="14"/>	Month 6	<input style="width: 80%;" type="text" value="88"/>

F. Forecast - Next 12 months^{3*}

Month 1	1320	Month 2	320
Month 3	320	Month 4	620
Month 5	342	Month 6	342
Month 7	342	Month 8	342
Month 9	342	Month 10	342
Month 11	342	Month 12	342

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **544.000**

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average-Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	2610	4.798

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **67.375**

Explanation

Integra customer Northshore School District is requesting an additional block of 1000 consecutive numbers.

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net 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.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Pooling Administration System

 roxanne.richards@integratelecom.com (SP)

[Sign Out](#)

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

Your utilization calculates to **67.375 percent**. The FCC requires a utilization of **75.000 percent**.

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



Technology Department

Northshore
School District

August 22 , 2006

Integra Telecom
20435 -72nd Ave S.
Suite 150
Kent, WA 98032

Attn: Sonia Woods

Sonia,

Northshore School District would like to request additional 1000 DID numbers to add to our current block of 3000 DID numbers to bring the total to one continuous block of 4000 numbers. We are making this request because during the planning of our renumbering project it became obvious that 3000 numbers was not going to be enough to cover the whole school district.

This shortage of numbers is delaying the planning of this project and we would like to resolve this request as soon as possible.

Please contact me if you have any questions.

Mike Hawker
WAN Telecom Specialist
Northshore School District Technology Department
mhawker@nsd.org
Ph: 425/489-6699
Fax: 425/489-6317