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UT-101184-NR

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Consent

LOCALTEL
COMMUNICATIONS

Computers 5 INC
dba LocalTel
341 Grant Road
East Wenatchee, WA 98802
509-888-8888

Debra Purcell
Division Manager
Code Administrator

July 1st, 2010

Updated 7/7/10 DFP

Mr. David Danner
Executive Director & Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, Washington 98504

Re: Wenatchee Rate Center Numbering Waiver

Dear Mr. Danner:

By this letter LocalTel is requesting a waiver of the utilization threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200, which would allow PA/NeuStar, the Numbering Pooling Administrator, to assign a new thousand block from the Industry Pool that meets the needs of a specific LocalTel Customer, Central Washington Hospital.

The customer request is for 1000 sequential telephone numbers in the 509 NPA, Wenatchee Rate Center. Specifically, the Customer (Central Washington Hospital) has requested that the numbers be in a single NXX. The Customer intends to start deploying these numbers upon installation with the completion of the new Hospital wing that is being constructed. The new numbers are needed for expansion. LocalTel asks that the WUTC authorize NeuStar to assign one block that would meet the customer's needs from the 509 NPA Wenatchee Rate Center.

STATE OF WASH
UTIL. AND TRNSP
COMMISSION

2010 JUL -7 PM 1:05

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REGISTRATION MANAGEMENT

The Customer will not return any existing telephone numbers as this request is for an expansion at their current location(s). The original customer request has been provided with this letter as Confidential Attachment A.

In our effort to satisfy the customer's request, LocalTel submitted a request to PA/NeuStar on June 17th, 2010 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B. In order for the request to be approved, LocalTel will require a waiver of the current usage threshold for new numbering requests.

The FCC allows for a waiver of the rules when there is a demonstrated need such as a specific customer request for a large block of numbers. The waiver process is specifically addressed in the FCC Third Report and Order ("Order") as the "safety valve" process (See FCC 01-362, Paras. 57-66), which went into effect on March 14, 2002. The Order delegates the authority to hear claims for waivers to the state commissioners and recommends that the state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See Paras. 61,66)

The projected exhaust for the 509 area code is the 4th quarter of 2016. There are 63 blocks left in the Wenatchee Rate center of the 509 area code.

LocalTel respectfully requests that the Commission approve the request for waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/NeuStar to assign a 1K thousands block in the 509 NPA Wenatchee Rate Center to accommodate our customer's request.

All directives can be emailed, faxed or mailed directly to:

Kevin Gatchell
PA Code Administrator
NeuStar, Inc
1800 Sutter Street
Concord, Ca 94520
Phone : 925-363-8742
Fax: 925-363-7692
Email: Kevin.Gatchell@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please contact Debra Purcell at 509-888-9148 or debra@localtel.net
We would appreciate being copied on any correspondence with PA/NeuStar.

Respectfully,


Debra Purcell



LocalTel Communications
Attn: Genia Minton-Lutton
343 Grant Road
East Wenatchee, WA 98802

To Whom It May Concern:

Central Washington Hospital is embarking on a major expansion project which will add 800 lines of direct dial service to our telephony system. These lines will be used to facilitate direct physician to care provider communication utilizing a combination of wired, wireless, and fixed mobile convergence systems. Each care provider will be assigned a dedicated direct dial extension and these will be linked via our Cerner Health Information System to our electronic medical record. By utilizing this methodology we will be able to significantly decrease the time it takes for assigned providers to communicate directly to each other without having to wait for an intermediary to locate and pass the call along via internal extensions. We intend to fully utilize these lines within 6 months of provisioning. Additionally we have a number disparate DID blocks of numbers across prefixes and this adds confusion to locating the correct DID for a particular area. As part of this process we hope to re-assign approximately 200 numbers from the disparate blocks into the proposed contiguous block of numbers. We expect this process to take up to 2 years as the new numbers are published and the old numbers are retired.

Due to these project efforts we are requesting a block of 1000 numbers assigned to CWH so that we may continue our project design and deployment.

Thank you for your consideration in this matter and helping us provide a higher standard of care to our region.

A handwritten signature in black ink, appearing to read 'Eric Lowe', with a long horizontal flourish extending to the right.

Eric Lowe
IT Application Services and Telecommunications Manager
Central Washington Hospital

Attachment B

November 21, 2003
ATIS-0300086.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPA Part 3

Tracking Number : 509-WENATCHEE-
WA-370096

Date of Application: 06/17/2010 Effective Date: _____
Date of Receipt: 06/17/2010 Date of Response: 06/17/2010

Service Provider Name: LOCALTEL - WA
(Telcordia™ LERG™
Routing Guide) OCN: 3229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-363-8742

Signature of Pooling Administrator
Kevin Gatchell Fax: 925-363-7692

Name (print)

Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-
NXX-X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code Modified : _____
Block/Code
Disconnected : _____

Block Contaminated(Yes or No) : _____

If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹ WNTCWABADS0

Rate Center: WENATCHEE

Rate Center Sub Zone: Wenatchee

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

(B)

___ Request withdrawn.

Explanation:

___ Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)



Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 509-WENATCHEE-WA-370096

Date: 06/17/2010

OCN: 3229

Company Name: LOCALTEL - WA

Rate Center: WENATCHEE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 508-888

Name of Block Applicant: Debra Purcell

Signature: Debra Purcell

Title: Code Administrator
509-884-5197

Telephone No.: 509-888-888148

FAX No.:

E-mail: debra@localtel.net

A. Available Numbers: 4536

B. Assigned Numbers: 5464

C. Total Numbering Resources: 10000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: 0

List
Excluded
Code(s) or
Block(s):

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
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E. Growth History - Previous 6 months ³	<u>142</u>	<u>53</u>	<u>105</u>	<u>186</u>	<u>160</u>	<u>278</u>
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F. Forecast
 - Next 12 months⁴ 155 155 155 155 155 155 155 155 155 155 155 155

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 155.0

H. Months to Exhaust⁵ =
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	4536	29.265

I. Utilization⁶ =
$$\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$$
 54.64

Explanation: Customer is requesting a continous 1000 numbers for their location. Central Washington Hospital

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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

TBPAG Attachment 1 - March 19, 2007

B

Thousands-Block Application Form - Part 1A

Tracking Number: 509- WENATCHEE- WA-370096 Individual Block Request

Type of Application: [X] New [] Change [] Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: LOCALTEL - WA
Headquarters Address: 341 Grant Road
City, State, Zip: East Wenatchee, WA, 98802
Contact Name: Debra Purcell
Contact Address: 341 Grant Road
City, State, Zip: East Wenatchee, WA, 98802
Phone: 509- 888-8888 - 148 FAX: 509- 884-5197 E-mail: debra@localtel.net

Pooling Administrator: ii

Contact Name: Kevin Gatchell
Contact Address: 1800 Sutter St
City, State, Zip: Concord, CA, 94520
Phone: 925-363-8742 FAX: 925-363-7692
E-mail: kevin.gatchell@neustar.biz

1.2 General Information:

(B)

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: 509 LATA: 676 OCN: ^{iv} 3229 Parent Company's OCN 3229

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
WNTCWABADS0

City or Wire Center Name : _____ Rate Center: ^{vi}
Wenatchee WENATCHEE

Rate Center Sub Zone: Wenatchee

1.3 Dates:

Date of Application: ^{vii} 06/17/2010 Requested Block Effective Date: ^{viii} 07/18/2010

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) 509-885-1000
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated

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in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

OCN:Intra-company ^{ix} Switching Id Part 1B

OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks: This is for a specific customer request for a continous 1000 numbers.

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines (ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Debra Purcell

Signature of Block Applicant

Code 06/17/2010
Administrator

Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character

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alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider ^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s)

(B)

is/will be active in the network prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.