

UT-111485-NR

August 10, 2011

Mr. David Danner  
Executive Director & Secretary  
Washington Utilities and Transportation Commission  
1400 S. Evergreen Park Drive SW  
Olympia, Washington 98504

RECEIVED  
RECORDS MANAGEMENT  
2011 AUG 12 AM 9:50  
STATE OF WASH  
UTIL. AND TRANSP  
COMMISSION

**Re: Seattle Rate Center Numbering Waiver**

Mr. Danner:

By this letter, Global Crossing Local Services, Inc. ("Global Crossing") is requesting a waiver of the utilization and months-to-exhaust thresholds outlined in the FCC's Numbering Resource Optimization Orders, FCD 00-429 and FCC 01-362, released in CC Docket NO. 99-200, to allow the Pooling Administrator (PA) /NeuStar, to assign blocks of numbers that meet the need of a specific Global Crossing customer.

The customer request is for 10,000 sequential telephone numbers in the 206 NPA, in the Seattle rate center. The customer has made this request to Global Crossing verbally. Specifically, the customer has requested the 740 NXX. The customer will begin to activate and use these numbers as soon as they are assigned. Global Crossing respectfully asks that the Washington Utilities and Transportation Commission to authorize NeuStar to assign the 206/740 NPA/NXX to meet the customer's needs.

Global Crossing filed applications with Neustar in thousands-block increments to meet the customer's needs. The applications are attached as Attachment 1 hereto. Neustar has informally advised Global Crossing that it will require a waiver from the Commission to process the applications. Neustar has reserved the requested block. Confirmation of the reservations is attached as Attachment 2 hereto.

The customer will utilize the numbers for its internal communications needs and will begin to assign numbers to employees as soon as the block is activated. Given the number of employees, the customer anticipates that it will utilize all of the numbers within six months of activation and

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does not anticipate returning any numbers to the pool. The customer's response to specific questions regarding its plans for the numbers is Attachment 3 hereto.

The FCC allows for a waiver of the rules when there is demonstrated need, such as a specific customer request for a large block of numbers, that cannot otherwise be met. 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 was effective on March 14, 2002. The Order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See Paras. 61, 66).

Global Crossing respectfully requests that the Commission approve the request for a waiver of rate center utilization and months-to-exhaust and direct NeuStar to reserve and assign the 206/740 NPA/NXX to accommodate the customer's request.

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

Mr. Kevin Gatchell  
Senior Pooling Specialist  
Pooling Regional Office  
1800 Sutter St. Ste 780  
Concord, CA 94520

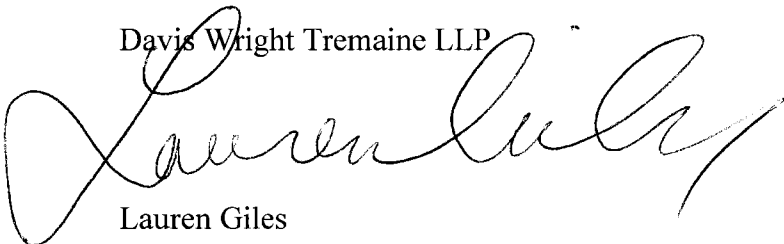
[kevin.gatchell@neustar.biz](mailto:kevin.gatchell@neustar.biz)

I would greatly appreciate being copied on any correspondence with Neustar or Mr. Gatchell.

Thank you for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

Davis Wright Tremaine LLP



Lauren Giles

# **Attachment 1**

Thousands-Block Application Form - Part 1A

Tracking Number: 206-SEATTLE-  
WA-434883  
Block  
Reservation  
Request

Type of Application:  New  Change <sup>i</sup>  Disconnect

**GENERAL APPLICATION INFORMATION**

**1.1 Contact Information:**

Block Applicant:

Company Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA

Headquarters Address: 225 Kenneth Dr

City, State, Zip: Rochester, NY, 14623

Contact Name: Erika Lawrence

Contact Address: 225 Kenneth Dr

City,State,Zip: Rochester , NY , 14623

Phone: 585-255-1037 FAX:            E-mail: erika.lawrence@globalcrossing.com

Pooling Administrator: <sup>ii</sup>

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:**

Check one : No LRN needed  X  LRN needed <sup>iii</sup> \_\_\_\_\_

NPA:  206  LATA:  674  OCN: <sup>iv</sup>  8391  Parent Company's OCN  8391

Number of Thousands-Blocks Requested :  10

Switching Identification(Switch Entity/POI) : <sup>v</sup>

STTLWAWBDS5

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup>  SEATTLE

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**

Date of Application: <sup>vii</sup>  04/18/2011  Requested Block Effective Date: <sup>viii</sup> \_\_\_\_\_

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  X

**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)  206-740   
 all blocks 0 thru 9
- 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  X  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 in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

OCN:Intra-company <sup>ix</sup>  Switching Id  Part 1B

OCN:Inter-company <sup>x</sup>  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: **Please reserve - WUTC safety valve request pending**

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](mailto:inc@atis.org) as of the date of this application.

**Erika Lawrence**

**Signature of Block Applicant**

**CLEC**  
**Network**  
**Engineer**

**Title**

**04/18/2011**

**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 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 CLI™ tandem of the facilities based provider<sup>xi</sup>. 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 :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> 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).

<sup>v</sup> 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<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.



## **Attachment 2**

**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:45 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

# Pooling Administration System

Dated 20-April-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

## Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 206-SEATTLE-WA-434883

Date of Application: 04/18/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 04/18/2011 Date of Response: 04/20/2011

Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

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 : 206 - 740 - 0

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

42

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

**Request withdrawn.**

Explanation:

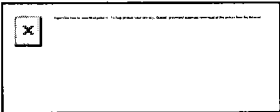
**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:45 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
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Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

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 : 206 - 740 - 1

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

29

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

Form Complete, request denied.

Explanation:

Request withdrawn.

Explanation:

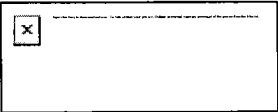
Assignment activity suspended by the administrator.

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



From: kevin.gatchell@neustar.biz  
Sent: Wednesday, April 20, 2011 6:45 PM  
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Date of Receipt: 04/18/2011 Date of Response: 04/20/2011

Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

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

X NPA-NXX or NPA-NXX-X : 206 - 740 - 2

Block Assigned: \_\_\_\_\_

Block Reserved : Yes

Block Reservation Expiration Date : 07/20/2011

Block/Code Modified : \_\_\_\_\_

Block/Code Disconnected : \_\_\_\_\_

Block Contaminated(Yes or No) :

YES

If Yes, enter the number of TNs contaminated :

82

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

**Request withdrawn.**

Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

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Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 8391

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 : 206 - 740 - 3

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :



If Yes, enter the number of TNs contaminated :

75

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

Form Complete, request denied.

Explanation:

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

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**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

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November 21, 2003  
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Attachment 3

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**Date of Receipt:** 04/18/2011      **Date of Response:** 04/20/2011

**Service Provider Name:** GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

**NPAC SOA SPID :** \_\_\_\_\_

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**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 : 206 - 740 - 4

**Block Assigned:** \_\_\_\_\_  
**Block Reserved :** Yes  
**Block Reservation Expiration Date :** 07/20/2011  
**Block/Code Modified :** \_\_\_\_\_  
**Block/Code Disconnected :** \_\_\_\_\_  
**YES**

**Block Contaminated(Yes or No) :**

If Yes, enter the number of TNs contaminated :

68

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

**Request withdrawn.**

Explanation:

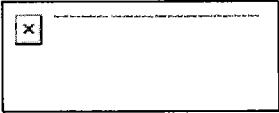
**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

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**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:46 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
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Signature of Pooling Administrator  
Kevin Gatchell Fax: 925-363-7692  
Name (print)  
Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-NXX-X : 206 - 740 - 5

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

65

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

Form Complete, request denied.

Explanation:

Request withdrawn.

Explanation:

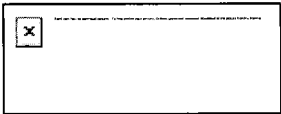
Assignment activity suspended by the administrator.

Explanation:

**Remarks:**

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To: Lawrence, Erika
Cc: PA\_Part3@neustar.biz
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(Telcordia LERG Routing Guide ) OCN: 8391

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

X NPA-NXX or NPA-NXX-X : 206 - 740 - 6

Block Assigned:
Block Reserved : Yes
Block Reservation Expiration Date : 07/20/2011
Block/Code Modified :
Block/Code Disconnected : YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

90

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

**Request withdrawn.**

Explanation:

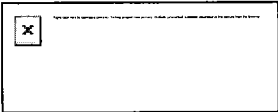
**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:46 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

# Pooling Administration System

Dated 20-April-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

## Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 206-SEATTLE-WA-434883

**Date of Application:** 04/18/2011 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 04/18/2011 **Date of Response:** 04/20/2011

**Service Provider Name:** GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

**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 : 206 - 740 - 7

**Block Assigned:** \_\_\_\_\_  
**Block Reserved :** Yes  
**Block Reservation Expiration Date :** 07/20/2011  
**Block/Code Modified :** \_\_\_\_\_  
**Block/Code Disconnected :** \_\_\_\_\_  
**YES**

**Block Contaminated(Yes or No) :**



If Yes, enter the number of TNs contaminated :

62

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

Form Complete, request denied.

Explanation:

Request withdrawn.

Explanation:

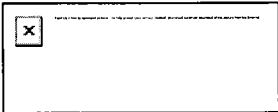
Assignment activity suspended by the administrator.

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:46 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

# Pooling Administration System

Dated 20-April-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

## Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 206-SEATTLE-WA-434883

Date of Application: 04/18/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 04/18/2011 Date of Response: 04/20/2011

Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

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 : 206 - 740 - 8

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

88

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

**Request withdrawn.**

Explanation:

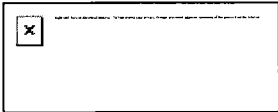
**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



**From:** kevin.gatchell@neustar.biz  
**Sent:** Wednesday, April 20, 2011 6:47 PM  
**To:** Lawrence, Erika  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

# Pooling Administration System

Dated 20-April-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

## Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 206-SEATTLE-WA-434883

Date of Application: 04/18/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 04/18/2011 Date of Response: 04/20/2011

Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA  
(Telcordia™ LERG™ Routing Guide ) OCN: 8391

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](mailto:kevin.gatchell@neustar.biz)

NPA-NXX or NPA-NXX-X : 206 - 740 - 9

Block Assigned: \_\_\_\_\_  
Block Reserved : Yes  
Block Reservation Expiration Date : 07/20/2011  
Block/Code Modified : \_\_\_\_\_  
Block/Code Disconnected : \_\_\_\_\_  
YES

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

57

Switch Identification(Switch Entity/POI): <sup>1</sup>

STTLWAWBDS5

Rate Center:

SEATTLE

Rate Center Sub Zone:

**Form Complete, request denied.**

Explanation:

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**Request withdrawn.**

Explanation:

---

**Assignment activity suspended by the administrator.**

Explanation:

---

**Remarks:**

**Block Reserved. You must request assignment of the reserved block on or before the block reservation expiration date indicated above otherwise the block will made available again.**

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



# **Attachment 3**



7/28/2011

Amazon.com Inc

551 Boren Ave N.

Seattle, Washington 98109

Dear Mr. Shortley,

Here is the supplemental information requested for our most recent Seattle DID block request. I believe I've addressed all the previous concerns with our responses below. If there are any additional questions please let me know!

1. What is the customer's internal numbering plan?
  - a. We have a 5-digit dial plan where we use the last 5 digits of the DID as the user's extension. This applies only to our Seattle location as all other locations are autonomous.
2. How does the customer plan to assign numbers?
  - a. We will continue to assign all Seattle employees a telephone number. We will also use numbers for hunt groups, auto attendants, call forwards, and the like. Given the number of employees (see below) and the other uses for the numbers, we anticipate utilizing all numbers within 6 months and do not anticipate having any numbers to return to the pool.
3. How many employees does the customer have?
  - a. We have 13,710 users defined in our Seattle area phone system and another 785 DIDs assigned to conference rooms, hotel stations, fax machines, etc. Last year, for example, we had approximately 7000 users defined. We expect this same growth pattern to continue for at least 2 more years.
4. Amazon does not provide telephone service to residences.

Sincerely,

Raul Camacho, Manager of Global Telecom