

Suite 22001201 Third AvenueSeattle, WA 98101-3045

Lauren Giles 206.757.8259 tel 206.757.7259 fax

laurengiles@dwt.com

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

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

DWT 17949944v1 0047459-000042

Mr. David Danner August 10, 2011

Page 2

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

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

206-SEATTLE-WA-434883

Number:

Block Reservation Request

Type of

Application:

Change i 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,

Rochester, NY, 14623

Contact

Zip:

Name:

Erika Lawrence

Contact

225 Kenneth Dr

Address:

City, State, Zip: Rochester, NY, 14623

Phone: <u>585-</u> FAX: _

E-mail: erika.lawrence@globalcrossing.com

255-1037

Pooling Administrator: "

Contact Name:

Kevin Gatchell

Contact

1800 Sutter St

Address:

City, State, Zip: Concord, CA,94520

FAX: 925-363-

Phone:

925-363-8742 7692

E-mail: kevin.gatchell@neustar.biz

1.2 General Information:
Check one : No LRN needed X LRN needed iii
NPA: <u>206</u> LATA: <u>674</u> OCN: iv Parent Company's OCN <u>8391</u>
Number of Thousands-Blocks Requested : 10 Switching Identification(Switch Entity/POI) : V STTLWAWBDS5
City or Wire Center Name : Rate Center: vi SEATTLE Rate Center Sub Zone:
1.3 Dates:
Date of Application: VII Requested Block Effective Date: VIII
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) YesNoX
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: YesIf Yes, attack proof of capability to provide service within 60 days.	n evidence of au	thorization and
Growth block for rate center: Yes X If Yes, a worksheet	ttach months to	exhaust
By selecting this checkbox, I acknowledge that I ared and explicitly understand that the underlying CO couthe PSTN and loaded in the NPAC on the block effective	de may not yet be	
Type of change(Mark <u>all</u> that apply)		
OCN:Intra-company ix Switching Id	Part 1B	
OCN:Inter-company * Fffective Date		
Change block: YesIf 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 assign c) Have all new Intra SP ports been completed in the Id d) Has this block been protected from further assignment 	NPAC Yes	
Disconnect block : YesIf Yes , list NPA-NX	X-X	
Remarks: Please reserve - WUTC safety valve reque	est pending	
I hereby certify that the above information requesting ar accurate to the best of my knowledge and that this appli accordance with the Thousands-Block (NXX-X) Poolin Guidelines(ATIS-0300066) available on the ATIS web by contacting inc@atis.org as of the date of this applicant	cation has been p g Administration site (http://www	prepared in
Erika Lawrence	CLEC Network Engineer	04/18/2011
Signature of Block Applicant	Title	Date

<u>Instructions for filling out each Section of the Part 1A form:</u>

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM 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. The 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 CLLITM 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) 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 <u>not</u> the current Block Holder

xi 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: Cc:

Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

Pooling Administration System

Block Contaminated(Yes or No):

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Attachment 3 November 21, 2003 ATIS-0300066.at3 Pooling Administrator's Response/Confirmation **TBPAG Part 3** 206-SEATTLE-WA-Tracking Number: 434883 04/18/2011 Effective Date: Date of Application: 04/20/2011 04/18/2011 Date of Response: Date of Receipt: Service Provider Name: GLOBAL CROSSING LOCAL SERVICES, INC.-WA (Telcordia [™] LERG [™] Routing 8391 Guide) OCN: NPAC SOA SPID: **Pooling Administrator Contact Information:** 925-363-8742 **Kevin Gatchell** Phone: Signature of Pooling Administrator Fax: 925-363-7692 **Kevin Gatchell** Name (print) kevin.gatchell@neustar.biz Email: 206 - 740 -NPA-NXX or NPA-Block Assigned: NXX-X: Yes Block Reserved: **Block Reservation** 07/20/201 **Expiration Date:** Block/Code Modified Block/Code Disconnected: YES

If Yes,enter the number of TNs contaminated :	42		
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5		
Rate Center:	SEATTLE		
Rate Center Sub Zone:	•		
Form Complete, request denied.			
Explanation:			
Request withdrawn.			
Explanation:			
Block Reserved. You must request assignment of the i			
Block Reserved. You must request assignment of the i			
Block Reserved. You must request assignment of the i			
Remarks: Block Reserved. You must request assignment of the reservation expiration date indicated above otherwise the expiration date indicated above otherwise the servation expiration date indicated above otherwise the This is an eleven-character descriptor provided by the own alls. This must be the CLLI TM Location Identification code of Part 1A form (Telcordia, LERG ROUTING Guide and CLLI as Technologies, Inc.)	he block will made available again. ning entity for the purpose of routing of the switching entity/POI shown on the		
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Dated 20-April-2011

From:

kevin.gatchell@neustar.biz

Sent:

Wednesday, April 20, 2011 6:45 PM

To: Cc: Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

Pooling Administration System

ATIS-0300066.at3	ooling Administrator's Re TBPAG Pa		
Tracking Number :	206-SEATTLE-WA- 434883		
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NPAC SOA SPID : Pooling Administrator Conf			025 262 9742
NPAC SOA SPID : Pooling Administrator Cont Kevin Gatchell	Phor	ne:	925-363-8742
NPAC SOA SPID : Pooling Administrator Conf	Phor	ne:	925-363-8742 925-363-7692
NPAC SOA SPID : Pooling Administrator Conton Kevin Gatchell Signature of Pooling Adminis	Phor	ne:	

NPA-NXX or NPANXX-X:

Block Reserved:

Block Reservation
Expiration Date:

Block/Code Modified:

Block/Code
Disconnected:

Yes

Block/Code
Disconnected:

Yes

Yes

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	nter the number of TNs contaminated :				
Switch ic	dentification(Switch Entity/POI): 1	STTLWAWBDS5			
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Rate Ce	nter Sub Zone:	**************************************			
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Explanate Explan	served. You must request assignment of the	e reserved block on or before the block			
Explanate Explan	tion:	e reserved block on or before the block			
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Pooling Administration System

Dated 20-April-2011

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If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	And the second s
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emarks: Block Reserved. You must request assignment of the servation expiration date indicated above otherwise t	reserved block on or before the block he block will made available again.
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Sent:

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To: Cc: Lawrence, Erika PA_Part3@neustar.biz

Subject:

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November 21, 2003 ATIS-0300066.at3				Α	ttachment 3
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Service Provider Name:	GLOBAL CROS	SING LOCAL SEF	RVICES, INC	CWA	
(Telcordia [™] LERG [™] Routing Guide) OCN:	8391		A STATE OF STATE AND A STATE OF STATE O		
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Pooling Administrator Contac Kevin Gatchell		Phone:		925-363-8	3742
Signature of Pooling Administra Kevin Gatchell		Fax:		925-363-7	' 692
Name (print)			•		
Email:		kevin.gatchell@n	eustar.biz		
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			Block/Code Disconnecte		erro ver
Block Contaminated(Yes o	r No) :		YES		

If Yes,enter the number of TNs contaminated :	75		
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5		
Rate Center:	SEATTLE		
Rate Center Sub Zone:			
Form Complete, request denied.			
Explanation:			
Request withdrawn.			
Explanation:			
Remarks: Block Reserved. You must request assignment of the eservation expiration date indicated above otherwise t			
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Part 1A form (Telcordia,LERG ROUTING Guide and CLLI a Fechnologies,Inc.)	are trademarks of Telcordia		

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Pooling Administrator Conta Kevin Gatchell Signature of Pooling Administra		Phone:		925-363-	8742
Kevin Gatchell	mperior and a management of the contract of th	Fax:		925-363-	7692
Name (print) Email:		kevin.ga	tchell@neustar.biz	,	
X NPA-NXX or NPA- 206 NXX-X: 4	5 - 740 -		Block Ass	signed:	
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			Block/Cod	le Modified	
			Block/Cod Disconnect		Name of the state
Block Contaminated(Yes o	r No) :		YES		

If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	
Explanation:	
Explanation:	
Remarks: Block Reserved. You must request assignment of the	reserved block on or before the block
Remarks:	reserved block on or before the block the block will made available again.

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kevin.gatchell@neustar.biz

Sent:

Wednesday, April 20, 2011 6:46 PM

To: Cc: Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

Dated 20-	-April-2011		
	November 21, 2003 ATIS-0300066.at3		Attachment 3
		Pooling Administrator's Response/Confirmation TBPAG Part 3	

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Service Provider Name:	GLOBAL CROS	SING L	OCAL SER	VICES, IN	CWA	
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Pooling Administrator Contac Kevin Gatchell	ct Information:	Phone	:		925-363-8	3742
Signature of Pooling Administra Kevin Gatchell	ator	Fax:			925-363-7	7692
Name (print)	() months	-				
Email:		<u>kevin.</u>	gatchell@ne	eustar.biz		
X NPA-NXX or NPA- NXX-X: 5	6 - 740 - 			Block Ass	igned:	
1000000				Block Res	erved :	Yes
				Block Res xpiration [07/20/201 1
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				Block/Cod isconnect		Spanned School Sept.
Block Contaminated(Yes o	r N o) :		_	YES		

If Yes,enter the number of TNs contaminated :	
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Rate Center Sub Zone:	
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Explanation:	
Request withdrawn.	
Explanation:	
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Pooling Administration System

Dated 20-April-2011

November 21, 2003 ATIS-0300066.at3

Name (print)

Email:

Attachment 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:	- Commission Commissio	LOCAL SERVICES, II	NCWA
(Telcordia [™] LERG [™] Routing Guide) OCN:	8391		A
NPAC SOA SPID :			
Pooling Administrator Conta	ct Information:		
Kevin Gatchell	Phoi	ne:	925-363-8742
Signature of Pooling Administr	ator		
Kevin Gatchell	Fax:		925-363-7692

Pooling Administrator's Response/Confirmation TBPAG Part 3

X NPA-NXX or NPA6

Block Assigned:

Block Reserved:

Yes

Block Reservation
Expiration Date:

Block/Code Modified

Block/Code
Disconnected:

YES

Block Contaminated(Yes or No):

kevin.gatchell@neustar.biz

	90
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	
Explanation:	
Remarks: Block Reserved. You must request assignment of the reservation expiration date indicated above otherwise the	eserved block on or before the block
	eserved block on or before the block e block will made available again.
Block Reserved. You must request assignment of the re	e block will made available again.

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Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

Block Contaminated(Yes or No):

November 21, 2003 ATIS-0300066.at3				Attachment :
	oling Administrator's R TBPAG F	esponse/Confirmation 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:	04/20/2	011
Service Provider Name:	GLOBAL CROSSIN	G LOCAL SERVICES, II	NCWA	
(Telcordia [™] LERG [™] Routing Guide) OCN:	8391			
NPAC SOA SPID :	Production of the same of the			agenta umbary till please - i vocanisates
Pooling Administrator Contac Kevin Gatchell		one:	925-363	-8742
Signature of Pooling Administra Kevin Gatchell	ator Fax	«	925-363	-7692
Name (print) Email:	<u>kev</u>	vin.gatchell@neustar.bi	<u>z</u>	
Email:	<u>kev</u> 5 - 740 -	<mark>/in.gatchell@neustar.bi</mark> Block As		
Email: White the second secon	· ·		- ssigned:	Yes
Email: White the second secon	· ·	Block As Block Re	eserved :	Yes 07/20/201 1
Email: White the second secon	· ·	Block As Block Re Block Re Expiration	eserved :	07/20/201 1

Disconnected:

YES

If Yes,enter the number of TNs contaminated :	62
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	
Explanation:	
Assignment activity suspended by the administrator Explanation:	r.
Explanation: Remarks: Block Reserved. You must request assignment of the	reserved block on or before the block
Explanation: Remarks:	reserved block on or before the block
Explanation: Remarks: Block Reserved. You must request assignment of the	reserved block on or before the block the block will made available again.

From:

kevin.gatchell@neustar.biz

Sent:

Wednesday, April 20, 2011 6:46 PM

To: Cc: Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

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oril-2011					
November 21, 2003 ATIS-0300066.at3				,	Attachment 3
Poo		or's Resp PAG Par	oonse/Confirmation t 3		
Tracking Number :	206-SEATTLE- 434883	WA-			
Date of Application:	04/18/2011		Effective Date:		
Date of Receipt:	04/18/2011		Date of Response:	04/20/2	011
Service Provider Name:	GLOBAL CRO	SSING I	LOCAL SERVICES, II	NCWA	_
(Telcordia [™] LERG [™] Routing Guide) OCN:	8391				
NPAC SOA SPID :		-		annum tanak (1888)	
Pooling Administrator Conta Kevin Gatchell	ct Information:	_Phone	:	925-363-	8742
Signature of Pooling Administra Kevin Gatchell	ator	Fax:		925-363-	7692
Name (print)	and Astronomic Astronomic State of the Control of t	****		With the Control of t	
Email:		<u>kevin.</u>	gatchell@neustar.bi	<u>z</u>	
X NPA-NXX or NPA- NXX-X: 8	6 - 740 -		Block As	ssigned:	
	normalistic of Valkenthikuminum		Block Re	eserved :	Yes
			Block Re Expiration	eservation Date :	07/20/201 1
			Block/Co	ode Modified	, , , , , , , , , , , , , , , , , , ,
			Block/Co Disconnec		The second secon
Block Contaminated(Yes o	r N o) :		YES		

If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	
Explanation:	
Remarks: Block Reserved. You must request assignment of the reservation expiration date indicated above otherwise t	

From:

kevin.gatchell@neustar.biz

Sent:

Wednesday, April 20, 2011 6:47 PM

To: Cc: Lawrence, Erika PA_Part3@neustar.biz

Subject:

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 206-SEATTLE-WA-434883

Poc

Block Contaminated(Yes or No):

April-2011				
November 21, 2003				Attachment
ATIS-0300066.at3	oling Administrator's Re	esponse/Confirmation		
F 00	TBPAG F			
Tracking Number :	206-SEATTLE-WA- 434883			
Date of Application:	04/18/2011	Effective Date:		
Date of Receipt:	04/18/2011	Date of Response:	04/20/2	011
Service Provider Name:	GLOBAL CROSSIN	G LOCAL SERVICES, II	NCWA	
(Telcordia [™] LERG [™] Routing Guide) OCN:	8391			
NPAC SOA SPID :				
	ct Information:			
NPAC SOA SPID : Pooling Administrator Contact Kevin Gatchell		one:	925-363	-8742
Pooling Administrator Contac	Pho	one:	925-363	-8742
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Pooling Administrator Contac Kevin Gatchell Signature of Pooling Administra Kevin Gatchell Name (print)	Pho ator Fax	C	925-363	
Pooling Administrator Contac Kevin Gatchell Signature of Pooling Administra Kevin Gatchell Name (print) Email:	Pho ator Fax	C	925-363 <u>z</u>	
Pooling Administrator Contact Kevin Gatchell Signature of Pooling Administration Kevin Gatchell Name (print) Email: NPA-NXX or NPA- 206	Pho ator Fax <u>kev</u>	rin.gatchell@neustar.bi	925-363 <u>z</u> ssigned:	
Pooling Administrator Contact Kevin Gatchell Signature of Pooling Administration Kevin Gatchell Name (print) Email: NPA-NXX or NPA- 206	Pho ator Fax <u>kev</u>	r <u>in.gatchell@neustar.bi</u> Block As Block Re	925-363 ssigned: sserved:	-7692
Pooling Administrator Contact Kevin Gatchell Signature of Pooling Administration Kevin Gatchell Name (print) Email: NPA-NXX or NPA-206	Pho ator Fax <u>kev</u>	rin.gatchell@neustar.bi Block As Block Re Block Re Expiration	925-363 ssigned: sserved:	Yes 07/20/201

YES

If Yes,enter the number of TNs contaminated :	57
Switch Identification(Switch Entity/POI): 1	STTLWAWBDS5
Rate Center:	SEATTLE
Rate Center Sub Zone:	
Form Complete, request denied.	
Explanation:	
Request withdrawn.	
Explanation:	
Assignment activity suspended by the administrator. Explanation:	
	
Explanation: emarks: Block Reserved. You must request assignment of the re	

Attachment 3

7/28/2011

amazon.com

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