



March 5, 2018

Steven V. King
Executive Director & Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

RE: Request of Asotin Telephone Co. for expedited review of NeuStar Pooling Administrator Denial of Application for Numbering Resources

Dear Mr. King,

Asotin Telephone Company d/b/a TDS Telecom intends to install a state of the art switching system in Asotin, WA which will replace our legacy switch. In order to conduct an orderly transition to this new platform TDS Telecom requires the use of numbering resources, specifically a "Local Routing Number" (LRN) that will allow the new switch to coexist with the legacy equipment. Once the transition is complete, TDS Telecom intends to return this new code to the NANPA pool for reuse elsewhere in the state.

Today, we do not meet the NANPA utilization guidelines needed to obtain a new LRN in Asotin, WA and we are requesting a state waiver from the commission. TDS Telecom is committing to return the LRN and all associated number blocks to NANPA once we have completed our full customer migration and decommission the legacy switch. After which time TDS Telecom will return this new code to NeuStar and the number pooling administrator. TDS Telecom is anticipating the full migration and decommission of the legacy switch within 3 years of implementation of the new switch. If unforeseen circumstances arise and TDS Telecom does not meet this deadline we will request an extension from the Washington Utilities and Transportation Commission.

TDS Telecom has reviewed the numbering resources assigned within the Asotin, WA rate center and the only existing code is assigned to TDS Telecom and is being utilized within our legacy switch. Since there are not any other NXXs assigned to Asotin, WA we are requesting to have a new NXX assigned. While TDS Telecom only requires a single block from a new NXX be assigned to establish a LRN, TDS Telecom is requesting a full code be assigned and will retain all 10 blocks to prevent contamination and assignment of numbers

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within the entire NPA-NXX. TDS Telecom will only use numbers for a LRN and milliwatt test number and will ensure all other numbers are blocked, so a smooth relinquishment of the NPA-NXX can happen when our legacy switch is decommissioned. This will prevent other blocks from being assigned to other carriers within the Asotin, WA rate center and will help ensure the code can be re-purposed in the future within the geographic area served by the 509 NPA.

This installation represents a significant investment in Washington and we hope the commission will support these investments by granting this waiver request.

Thank you for your assistance in this matter, please do not hesitate to contact me with any questions or further requirements.

Sincerely,

/s/ Paul Nejedlo

Paul Nejedlo
Sr. Administrator, Number Management

Enclosures