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July 30, 2020

Mr. Mark L. Johnson  
Executive Director  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA. 98503

RE: WA State Waiver Request: Quincy, WA -1261089

Received  
Records Management  
07/30/20 14:18  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Mr. Johnson,

MCIMetro Access Transmission Services LLC (OCN 7229) d/b/a Verizon Access Transmission Services (“Verizon”) (aka OCN 7274 MCI Worldcom Communications Inc.-WA), has a customer requesting 5,000 consecutive DID telephone numbers in the Quincy, WA rate center. This request stems from the need for a company to expand its technology footprint. MCIMetro does not have the 5,000 consecutive DID numbers available in inventory to provide this customer. Pool inventory options were reviewed, and there was not 5,000 consecutive numbers available either.

On July 2, 2020 Verizon filed a Pool Replenishment request with the PA seeking a new NXX code to obtain 5 Blocks of telephone numbers in the Quincy, WA rate center to meet this customers contiguous lines request. See [Exhibit 1](#) attached. Verizon meets both FCC’s requirement guidelines, Utilization of 75%, (calculated utilization 99.5%), and Months to Exhaust of 6 months (calculated MTE .009 months). See [Exhibit 2](#) attached.

On July 2, 2020 the PA denied Verizon’s request stating “Records indicate there are enough resources in the current inventory to fulfill your need.” [Exhibit 3](#) attached. Once again, MCIMetro reviewed its Pool options, and found that 5,000 **consecutive** telephone numbers were not available to fulfill this customer’s request.

A state commission may overturn the PA’s decision based on the state commission’s determination that the carrier has demonstrated a verifiable need for the requested numbering resources and has exhausted all other available remedies. See 47 C.F.R. § 52.15(g)(4). Specifically, the FCC has held that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request.” See *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, Third Report and Order and Second Order on Reconsideration, In the Matter of Numbering Resource Optimization; 17 FCC Rcd 252 (rel. Dec. 28, 2001) at ¶ 64. State commissions are permitted to grant such requests provided they are for customers seeking **contiguous** blocks of numbers, rather than “vanity numbers.” Id. See [Exhibit 4](#) attached for customers need.

Therefore, Verizon respectfully requests that the Washington Utilities and Transportation Commission overturn the Pooling Administrators decision and direct the PA to open a new NXX code, in order for

Verizon to obtain the 5 Thousands Block of consecutive DID numbers requested by our customer. Any remaining blocks will be returned to the pool.

To support our request the following documents are attached:

Exhibit 1: Part 1 Central Office Code (NXX) Assignment Request

Exhibit 2: MTE and Utilization Worksheet

Exhibit 3: Part 3 Pooling Administrator Denial

Exhibit 4: Verified Customer Need Request Letter

If you have any questions or require additional information to address this request, please contact me at 908-758-0808 or [karl.tucker@verizon.com](mailto:karl.tucker@verizon.com).

Sincerely,

A handwritten signature in cursive script that reads "Karl Tucker". The signature is written in black ink and is positioned above the printed name.

Karl Tucker