



August 1, 2006

Ms. Carole J. Washburn
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Subject: AT&T Safety Valve Request for Seattle Rate Center

Ms. Washburn,

AT&T submits this "safety valve" application for acquisition of an NXX-X Acquisition in Washington. AT&T requests that the Washington Utilities and Transportation Commission ("Commission") overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of our application for blocks of telephone numbers and that the Commission authorize the PA to release the requested numbers to AT&T so that we may serve our customer.

This request is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. 52.15(g)(4) and pursuant to the Thousands-Block Number (NXX-X)

Pooling Administration Guidelines and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").¹

The customer has requested 4000 numbers in the Seattle rate center.² We have developed a communications plan that the customer will implement when the numbers are made available to them. Their dial plan requires the NXX be from the 206 NPA. But, more specifically, to insure compatibility with their existing internal dialing plan, they would like an NXX ending in 3, 4 or 7.

On July 28, 2006, AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA for four blocks³ in the Seattle rate center. During the online session, with the Pooling Administration System ("PAS"), we received an error message indicating the request would not process through the system due to a utilization rate lower than the required percentage.⁴ The PA applies the FCC rules and INC Guidelines. These rules and guidelines require that a block holder requesting growth resources demonstrate that existing resources within the rate center will both exhaust within 6.0 months, and meet the 75% utilization level. The error message indicated that neither threshold has been met.

AT&T respectfully requests that the Commission overturn the PA's decision expeditiously in the interest of our customer, as we are unable to satisfy the numbering

¹ These guidelines may be found on the INC web site: <http://www.atis.org/atis/clc/INC/Incdocs.htm>

² AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions. See attached Company-Proprietary customer letter.

³ A copy of the Part 1A and MTE worksheet are appended. AT&T asks the Commission to treat the information contained as confidential by the Commission.

⁴ A copy of the error message is appended. AT&T asks the Commission to treat the information contained as confidential by the Commission.

needs of this customer without such an exception. Contact with the PA for the state of Washington may be made as follows:

Ms. Tara Farquhar
Pooling Administrator
NeuStar, Inc.
1800 Sutter Street
Concord, CA 94520
925- 363-7654

Respectfully submitted,

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