



6160 Golden Hills Drive - Golden Valley - Minnesota - 55416
PHONE: 763.745.8466
FAX: 763.745.8459

March 16, 2010

David Danner
Executive Director & Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

*Via Electronic Transmission:
records@utc.wa.gov*

Re: Safety Valve Request and Request for Expedited Review & Waiver of Numbering Resource Guidelines

Dear Mr. Danner:

Integra Telecom of Washington, Inc. (Integra) is in the process of relocating its Seattle offices to a new site within the Renton, Washington rate center. After a series of acquisitions over the past several years, Integra and its Washington affiliates have a variety of number assignments from the different companies acquired, and from several different rate centers. With this move to Renton and the assignment of a single 1000-block of telephone numbers will help Integra to project a unified image and more effectively use its numbering resources. Further, from a technical perspective, sequential telephone numbers make it easier to manage an organization's PBX, allowing 4-digit instead of 5-digit dialing within the organization. Integra is not yet at exhaust and needs a waiver of the numbering exhaust requirements from the Utilities and Transportation Commission in order to accomplish this project. The Company respectfully requests that the Commission grant a waiver of the numbering administration guidelines so that it may request a block of 1000 numbers for its new offices in Renton.

In support of Integra's request, I have enclosed as an attachment to the transmittal email, a copy of Integra's request to the Pooling Administrator, which includes the Administrator's system-generated response. Integra's responses to Staff's informal inquiries concerning this numbering request are as follows:

1. Who is the customer?

The 'customer' is actually Integra.

2. *How many numbers does the customer already have assigned to it by the company?*

Integra has no Renton rate center telephone numbers assigned to itself.

3. *What is the "actual" utilization of the assigned numbers by the customer?*

As noted in 2., above, Integra has no numbers assigned to itself out of the Renton rate center.

4. *How many employees does the customer have?*

Integra has approximately 300 employees that will be located in the Renton office.

5. *Does the customer provide phone service to residences? If so, how many?*

No.

6. *Does the customer provide space for other businesses? If so, how many?*

No.

7. *Does the customer project providing space for other businesses? If so, how many?*

No.

8. *Will the customer put all the numbers into service at once?*

No, Integra will not use all the numbers at once; the Company anticipates that it will initially use 500-600 from the block.

9. *When will the customer return the numbers noted in their request to the company?*

Integra will need approximately 12 months to transition all the numbers currently assigned internally which are slated for replacement if Integra is granted this request and additional numbering resources are assigned.

10. *How long will it take the company to return the numbers to the pool?*

Integra is unable to give an exact timeline for the return of any telephone number resources. The Company will: donate any blocks that have a 10% or less contamination level; monitor all the blocks that the currently assigned numbers are part of; identify any blocks that may be available for donation; and, after the numbers are disconnected and aged in accordance with numbering guidelines, donate as many blocks as possible.

Integra "Safety Valve Request"

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Please contact the undersigned if you have any questions or concerns. All directives can be emailed, faxed or mailed directly to:

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
Phone: 925-363-8742
Fax: 925-363-7692
Email: kevin.gatchell@neustar.biz

Thank you for your attention to this matter.

Sincerely,

/s/ Jeanne Bell

Jeanne Bell
Number Administrator
Integra Telecom
Direct: 503-453-8279
Fax: 503-453-8284
Email: jeanne.bell@integratelecom.com

Email Attachment

Cc: Betty Erdahl, WUTC Staff, via email: berdahl@utc.wa.gov
Cathy Murray, Manager, Regulatory Affairs, Integra Telecom