



at&t

January 18, 2011

**Mr. David Danner
Executive Director & Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504**

Re: Vancouver rate center Safety Valve

Mr. Danner:

By this letter, AT&T is requesting a waiver of the utilization and months-to-exhaust (MTE) thresholds outlined in the FCC's Numbering Resource Optimization Orders, FCD 00-429 and FCC 01-362, released in CC Docket NO. 99-200, allowing the Pooling Administrator (PA) /NeuStar, to assign numbers to satisfy the customer's request.

The customer request is for 1350 sequential telephone numbers in the 360 NPA, in the Vancouver rate center. The customer will activate these numbers as soon as they are tested and assigned. AT&T respectfully asks that the Washington Utilities and Transportation Commission authorize NeuStar to open a new code in NPA 360 given there are no blocks in the pool for the Vancouver rate center.

Our customer, Hewlett Packard, has facilities in Kirkland, Bothell, Bellevue, Redmond, Spokane, Seattle, Richland, Tukwila, Everett, Pasco and Renton Washington. They are looking to expanding their facility in the Vancouver rate center. The customer's Letter of Intent (LOI) is provided as Document 2. In our attempt to satisfy the customer's request, AT&T submitted a request to the PA/NeuStar on January 17, 2011 for additional resources. The application and the subsequent denial are in Document 3. In order for the request to be approved, AT&T requires a waiver of the current utilization and MTE thresholds for numbering resources.

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 cannot 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) .

AT&T respectfully requests that the Commission approve the request for a waiver, of rate center utilization and MTE thresholds, and direct the PA/NeuStar to open a new code in the 360 NPA for the Vancouver rate center and to assign 2 blocks to accommodate the customer's request.

All directives can be emailed, faxed or mailed directly to:

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
1800 Sutter Street
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: Kevin.Gatchell@NeuStar.biz

I would greatly appreciate being copied on any correspondence with Kevin. Thank you for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Dale Morgenstern

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Attachments