



April 8, 2013

Sent Via: E-Filing

Steven V. King, Acting Executive Director & Secretary
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

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

Dear Mr. King:

McDaniel Telephone Company d/b/a TDS Telecom submits this request to the Washington Utilities and Transportation Commission (Commission) for review and waiver of the NeuStar Pooling Administrator's denial of our request for additional numbering resources necessary to obtain a LRN for a new switch that will be installed in Salkum, WA.

On March 4, 2013 TDS Telecom submitted a Code Request for an additional LRN to the Pooling Administrator for the assignment of one block of 1000 telephone numbers in the 360 area code. The Pooling Administrator denied the request because TDS Telecom did not meet the months to exhaust (MTE) or utilization criteria established by the FCC.

As the Commission is aware, the FCC has adopted a safety valve mechanism to allow carriers that do not meet utilization criteria in a given rate center to obtain additional numbering resources. TDS Telecom is installing a new Metaswitch in its Salkum, WA location and thus requires one unique NPA-NXX assigned for a LRN to be provisioned to identify the switch or POI in the number portability capable network.

The industry Location Routing Number (LRN) Assignment Practices (ATIS-0300065) document provides that:

1. A unique LRN will be provisioned to identify each recipient switch or POI in the number portability capable network.
2. A service provider will establish one (1) LRN per LATA from an assigned NXX for each recipient switch or POI in the number portability capable network.

From a number conservation perspective, TDS Telecom is requesting to be assigned all 10 blocks within the new NPA-NXX with the provision that TDS Telecom will protect all 10,000 numbers from permanent assignment. What this will do is prevent the nine unused blocks from being returned to the Pool and thus would prevent the possibility that another carrier request and be

assigned one of the blocks from the new NPA-NXX. As such, this would help ensure the numbers do not become permanently stranded in the Salkum rete center.

After TDS Telecom has migrated all customers to the new switch and removed our legacy switch from the network, we will migrate the existing NPA-NXX and LRN to the new switch and will return the entire new code that is currently being requested. TDS Telecom will return the new code within 12 months of collapse of the new legacy switch. In the event the 360 NPA falls into relief planning prior to the return of the code, the Commission may request TDS Telecom to provide a progress report regarding the switch migration in Salkum and request TDS Telecom to try and expedite the migration so the new NPA-NXX can be returned and repurposed elsewhere in the 360 area code geography.

The Pooling Administrators decision violates the intent and requirement of the FCC and Commission in allowing carriers access to numbering resources to meet the required stands of portability in the network and the Pooling Administrators denial of numbering resources interferes with TDS Telecom to install a new switch in the Salkum, WA rate center.

If you have questions or concerns regarding this request, please contact either me at (608)664-4659, paul.nejedlo@tdstelecom.com or Gail Long at (503)656-8399, gail.long@tdstelecom.com.

Sincerely,

/s/ Paul Nejedlo

Paul Nejedlo
Sr. Administrator, Number Management

Enclosures