

Mailing:

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Everett, WA 98201

July 11, 2013

Mr. Steven King
Acting Executive Director & Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504-7250

Re: Numbering waiver for Kennewick General Hospital

Dear Mr. King,

Frontier Communications Northwest Inc. requests the Washington Utilities and Transportation Commission to direct the Pooling Adminstrator (PA) to provide Frontier with six one thousand number blocks to satisfy the requirement for addition numbers from Kennewick General Hospital located in Kennewick, WA in the Kennewick Rate Center, NPA 509, LATA 676, OCN 4324 switch KNWCWAXADS2.

The customer requests six one thousand number blocks to support its new hospital in the Southridge neighborhood of Kennewick. The hospital currently uses the 582, 585, 586 and 737 NXX codes and due to the use of a PBX system, they are unable to use NXX codes starting with "9". Therefore, the customer requests a waiver to allow the creation of a new NXX code so that they can reserve 6,000 consecutive numbers and permit all of the hospital's properties to share the same NPA-NXX code. The customer has several properties in the Tri-Cities area and plans on migrating all numbers into a consecutive numbering deployment plan. The customer will migrate the existing numbers over to the new blocks and will return them to Frontier. However, because the numbers are spread among varying NXX codes, Frontier does not believe any blocks will be available to be returned to the pool. There are approximately one hundred additional existing numbers that are associated with this customer in different physical locations that will migrate over to the new blocks as well. The customer has existing business lines for non-dialable purposes (e.g. alarm and elevator services, HVAC, etc.).

The waiver request is made because Frontier's request for one six thousand number block was denied by the PA because the serving central office does not meet the six (6) "months to exhaust" or utilization criteria. The PA requires the "months to exhaust" be less than or equal to six (6) months and the service central office is currently at 88 months. Also, the percent utilization is currently at 44.866%, which is less than the 75% utilization required by the FCC. The projected exhaust of NPA 509 is the 3rd quarter of 2028.

The Washington Commission has the authority to review the PA's criteria and request a waiver when appropriate, in this case a waiver request for the months to exhaust and utilization criteria. Frontier requests the commission instruct the PA to release the numbering resources necessary to meet the needs of this Frontier customer.

Frontier requests approval of this waiver request with an effective date of August 31, 2013. The Commission's waiver request must be submitted with the company's application to the PA for the numbering resources needed for deployment of service to this customer.

The following documents are attached as part of this request:

- Thousands-Blocks Application Form
- Months-to-Exhaust and Utilization Report
- Denial from Neustar
- Letter from customer dated June 5, 2013

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

Mr. Kevin Gatchell NeuStar PA/Code Administrator 180 Sutter Street Concord, CA 94520

Phone: 925-363-8742 Fax: 952-363-7692

Email: Kevin.Gatchell@NeuStar.biz

Please copy me on any correspondence with Kevin.

Thank you for your assistance with this matter. If you have any questions regarding this filing, please contact me at 425.261.6380.

Sincerely,

Carl Gipson

Manager - Government and External Affairs

Attachments

CC:

Betty Erdhal Bill Weinman