



March 20, 2014

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

Re: Seattle Rate Center Numbering Waiver

Dear Mr. King:

By this letter Teleport Communications America, LLC (TCAL), OCN 7146, is requesting a waiver of the utilization requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow the Pooling Administrator (PA)/NeuStar to assign 2 thousands blocks to meet the needs of a specific customer.

Specifically, the customer has requested 1500 sequential TNs in the Seattle Rate Center for a new call center. The call center will house the Taxpayer Advocate Office, the Taxpayer Assistance Center and other offices critical for the customer to adhere to Congressional requirements. The customer's Letter of Intent is attached. TCAL cannot satisfy this request from current inventory.

The 206 NPA is forecasted to exhaust in the fourth quarter of 2024. There are more than 180 unassigned NXXs in the 206 NPA and 7 blocks available in the PA pool inventory for the Seattle Rate Center.

In our effort to satisfy the customer's request, TCAL submitted a request to PA/NeuStar on March 14, 2014 for additional numbering resources. That application and the subsequent denial are attached. In order for the request to be approved, TCAL requires a waiver of the current month-to-exhaust and utilization thresholds for new numbering requests.

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. The waiver process is

Steven King
February 5, 2014
Page 2

specifically addressed in the FCC Third Report and Order (“Order”) as the “safety valve” process (See FCC 01-362, ¶¶ 57-66), which went into effect 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 ¶¶ 61, 66).

TCAL respectfully requests that the Commission approve the request for a waiver of months to exhaust and rate center utilization requirements, and direct PA/NeuStar to accommodate our customer’s request.

All directives can be emailed or faxed directly to:

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

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact me at 973-326-4069. I would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Dale Morgenstern

Dale Morgenstern
AT&T – Network Regulatory
340 Mt. Kemble Avenue – Suite 184
Morristown, NJ 07960

Enclosures