



August 27, 2015

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

Re: Vancouver 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 4 thousands blocks to meet the needs of a specific customer.

Specifically, the customer has requested 4000 telephone numbers in the Vancouver Rate Center for the relocated Corporate Headquarters of 900 veterinary hospitals. The new facility will be Corporate Headquarters to 15,000 employees of the 900 hospitals. The customer's Letter of Intent is attached. TCAL cannot satisfy this request from current inventory.

There is only 1 block in the Vancouver pool. Therefore we need to open a new code. TCAL will activate 4 blocks and the other 6 will replenish the pool. The customer will be returning approximately 4000 numbers from 503-922-5000-8999, over time, as they transition to the new facility.

In our effort to satisfy the customer's request, TCAL submitted a request to PA/NeuStar on August 26, 2015 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 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
NeuStar Inc- PA Code Administrator
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 908-234-5120. I would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Dale Morgenstern

Dale Morgenstern
AT&T – Network Regulatory
One AT&T Way – Suite 3D143
Bedminster, NJ 07920