



Allstream  
18110 SE 34<sup>th</sup> Street  
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1-855-299-7050  
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November 3, 2017

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

*Via email*  
11/03/17 11:57  
State Of WASH  
UTIL. AND TRANSP  
COMMISSION  
Received  
Records Management

**Re: Electric Lightwave, LLC dba Allstream (f/k/a Integra) Number Waiver Request for 206 NPA, Seattle Rate Center**

Dear Mr. King:

By this letter Electric Lightwave, LLC dba Allstream (“Allstream”) respectfully requests that the Washington Utilities and Transportation Commission (Commission) grant a waiver (Safety Valve Request) of the numbering exhaust 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 PA/Neustar, the Number Pooling Administrator, to open and assign one thousand (1000) sequential numbers that meet the needs of a customer.

Specifically, the customer has requested the block 206 NPA 9000 through 9999 to meet its growing dial plan requirements. The customer request has been provided with this letter as Attachment A pursuant to WAC 480-07-160. This document is confidential due to proprietary network information. A redacted Attachment A is also provided.


The 206 NPA is forecasted to exhaust in the 2<sup>nd</sup> quarter of 2025. There are 120 unassigned NXXs in the 206 NPA and 11 Blocks available in the PA pool inventory for the Seattle Rate Center, both of which are pristine blocks.

In our effort to satisfy the customer’s request, Allstream submitted a request to PA/Neustar on October 10, 2017 for additional numbering resources. Allstream is unable to meet the customer’s request with its current inventory, but our pooling request was denied as we do not meet the Months to Exhaust requirements. Allstream’s application and the subsequent denial have been provided as Attachment B pursuant to WAC 480-07-160. In order for the request to be approved, Allstream will require a waiver of Months to Exhaust requirements (Attachment C).

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).



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[@Allstream](https://twitter.com/Allstream)

Allstream respectfully requests that the Commission approve the request for a waiver of Months to Exhaust requirements, and direct PA/Neustar to assign 1000 sequential numbers in the 206 NPA Seattle Rate Center to accommodate our customer's request.

Directives to the Pooling Administrator can be emailed, faxed or mailed 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](mailto:Gatchell@neustar.biz)

Thank you for your attention to this matter. Please contact me if you need additional information.

Sincerely,

*/s/ Donna Heaston*


Donna Heaston  
Corporate Attorney  
Phone: 763-745-8466  
E-mail: [donna.heaston@allstream.com](mailto:donna.heaston@allstream.com)

CC: Rebecca Beaton, Regulatory Services Division, Utilities and Transportation Commission  
via email: [rbeaton@utc.wa.gov](mailto:rbeaton@utc.wa.gov)



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**REDACTED ATTACHMENT A**

[REDACTED]

10 October 2017

Allstream

[REDACTED]

RE: Request for additional DID Numbers  
Whom It May Concern:

[REDACTED] has outgrown it's DID numbers and requests a block of 1000 more numbers to work with our growth and dial plan.

We request 206 NPA 9000 thru 206 NPA 9999. Please contact me with any questions.

[REDACTED]

[REDACTED]


---

[REDACTED]



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## ATTACHMENT B

Tracking Number: 206-SEATTLE-WA-1041213Thousands-Block Application Form - Part 1A  
Revised: January 4, 2016**Full NXX: Pool  
Replenishment**Type of Application:  New  Change <sup>i</sup>  Disconnect

## General Application Information

## 1.1 Contact Information:

## Block Applicant:

Company Name: ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - WAHeadquarters Address: 18110 SE 34th St. Building One, SCity: Vancouver State: WA ZIP: 98683Contact Name: Jeanne BellContact Address: 18110 SE 34th St. Building One, Suite 100City: Vancouver State: WA ZIP: 98683Phone: 360-558-4159 Fax: 503-943-3346E-mail: jeanne.bell@Allstream.comPooling Administrator:<sup>ii</sup>Contact Name: Kevin GatchellContact Address: 1800 Sutter StCity: Concord State: CA ZIP: 94520Phone: 925-363-8742 Fax: 925-363-7692E-mail: kevin.gatchell@neustar.biz

## 1.2 General Information:

Check one : No LRN needed  LRN needed<sup>iii</sup>:

NPA: 206 LATA: 674 OCN<sup>iv</sup>: 7173 Parent Company's OCN 7173

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI<sup>v</sup>):  
TKWLWAZSDS0

Rate Center<sup>vi</sup>: SEATTLE

1.3 Dates:

Date of Application<sup>vii</sup>:  
10/10/2017

Requested Effective Date<sup>viii</sup>:  
12/15/2017

Requested Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No X

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 206-990, 206-944 206-xxx-9
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request:

Initial block for rate center : Yes \_\_\_\_\_ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

- OCN: Intra-company<sup>ix</sup>
- Switching Id
- Part 1B

OCN: Inter-company<sup>x</sup>  Effective Date

Change block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

1.6 Block Return :

- a) Is this block Contaminated: Yes \_\_\_\_ No \_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_ No \_\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_ No \_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site ([www.atis.org/inc](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

<b><u>Jeanne Bell</u></b>	<b><u>Number Administrator</u></b>	<b><u>10/10/2017</u></b>
Signature of Block Applicant	Title	Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv<sup>TM</sup>) LERG<sup>TM</sup> Routing Guide<sup>xi</sup>. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv<sup>TM</sup> Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch



**Heaston, Donna**

---

**From:** kevin.gatchell@neustar.biz  
**Sent:** Tuesday, October 10, 2017 1:11 PM  
**To:** Bell, Jeanne  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** 206-SEATTLE-WA-1041213 DENIED PAS - Part 3 Confirmation

**Pooling Administration System**

Dated 10 October 2017

Thousands-Block Number Pooling Administration Guidelines  
(TBPAG) - Part 3

**Revised: January 4, 2016**

**Pooling Administrator's Response/Confirmation**

Tracking Number : 206-SEATTLE-WA-1041213

Date of Application: 10/10/2017 Effective Date: \_\_\_\_\_

Date of Receipt: 10/10/2017 Date of Response: 10/10/2017

Service Provider Name: ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - WA  
(LERG™ Routing Guide<sup>1</sup>)  
OCN: 7173

Parent Company OCN: 7173

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-363-8742

Signature of Pooling Administrator  
Kevin Gatchell Fax: 925-363-7692

Name (print)

Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_

Block Reserved : \_\_\_\_\_

Block Reservation Expiration Date : \_\_\_\_\_

Block/Code Modified : \_\_\_\_\_

Block/Code Disconnected : \_\_\_\_\_

Block Contaminated (Yes or No): \_\_\_\_\_

If yes, enter the number of TNs contaminated (1-1000): \_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>:

TKWLWAZSDS0

Rate Center:

SEATTLE

**X** Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.


<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language<sup>®</sup> Location Code (CLLI<sup>™</sup> Code) of the switching entity/POI shown on the Part 1A form. Common Language<sup>®</sup> is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.





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## ATTACHMENT C

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>  
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **206-SEATTLE-WA-1041213**

Date: **Tuesday, October 10, 2017**

OCN:**7173**

Company Name:**ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - WA**

Rate Center: **SEATTLE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>:**NPA NXX BLOCK ID 206 204 8 206 209 4 and 5 206 209 5 206 245 1 206 257 6 206 304 5 206 317 0 206 387 4 206 388 0 and 1 206 392 0 through 9 206 436 0 through 3, 5 through 8 206 452 8 206 454 2, 3 and 7 206 456 9 206 462 7 206 474 1 and 2 206 489 1 206 529 3 206 533 5 206 582 3 and 4 206 602 1 206 606 1,2 and 4 through 8 206 631 8 206 639 6 206 651 2 206 658 2 206 696 7 206 708 8 206 724 0 206 744 0 through 9 206 787 8 206 788 3 and 4 206 805 0 through 8 206 812 0 through 9 206 816 1 and 8 206 829 1, 2 and 7 206 858 7 206 859 2 206 923 7 206 957 0 through 9 206 965 1 206 971 0,3 through 5, 7 and 8 206 973 1, 4 and 5 206 995 8** For a total of 113 blocks

Name of Block Applicant:**Jeanne Bell**

Signature: **Jeanne Bell**

Title:**Number Administrator**

Phone: **360-558-4159-**

Fax: **503-943-3346**

E-Mail: **jeanne.bell@Allstream.com**

A. Available Numbers:**8884**

B. Assigned Numbers: **103116**

C. Total Numbering Resources:**113000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>:**0**

List  
Excluded  
Code(s) or  
Block(s):

Month 1    Month 2    Month 3    Month 4    Month 5    Month 6    Month 7    Month 8    Month 9    Month 10    Month 11    Month 12

E. Growth History - Previous 6 months<sup>4</sup>  
685    2082    178    649    500    522

F. Forecast - Next 12 months<sup>5</sup>  
1000    765    765    765    765    765    500    500    500    500    500    500

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):804.167

H. Months to Exhaust<sup>6</sup>  
 = 
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>8884</b>	<b>11.047</b>

I. Utilization<sup>7</sup>  
 = 
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{\underline{91.253}}$$

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>4</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.