



Allstream
18110 SE 34th Street
Building One, Ste 100
Vancouver, WA, 98683

1-855-299-7050
www.allstream.com
@Allstream

December 13, 2018

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 E-Filing System
Received
Records Management
12/13/18 16:07
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Electric Lightwave, LLC dba Allstream 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 fourteen hundred (1400) sequential numbers that meet the needs of a specific customer.

Specifically, the customer has requested two consecutive blocks within the 206 NPA to meet its business requirement for one 206 NPA with a consecutive range of 1400 numbers. Allstream does not have 1400 numbers within the same 206 NPA, which is why this request is for two blocks. 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 1st quarter of 2028. There are 114 unassigned NXXs in the 206 NPA and 12 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 11-06-2018 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 a 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.



Allstream
18110 SE 34th Street
Building One, Ste 100
Vancouver, WA, 98683

1-855-299-7050
www.allstream.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 1400 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

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

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



Allstream
18110 SE 34th Street
Building One, Ste 100
Vancouver, WA, 98683

1-855-299-7050
www.allstream.com
 @Allstream

Redacted Attachment A



November 6, 2018

Allstream
Attn: Mark Sires
18110 SE 34TH Street
Building One, Suite 100
Vancouver, WA 98683

Dear Mark,

It's the intention of [REDACTED] to comply with the State of Washington's E911 legislation. In order to be compliant we must be able to send a unique Direct Inward Dialed (DID) to the PSAP on 911 dialed calls for each phone location that has outbound dial capabilities, this includes [REDACTED] along with another [REDACTED] that will require a DID number and per your correspondence Allstream does not have enough consecutive numbers to fulfill our request of 1400 numbers, because of this we are asking to have a new NPA-NXX opened up. Assuming that a new NPA-NXX will be opened and that it will be in the 206 area code, because of the PBX number plan implemented we are requesting a consecutive block of numbers or two smaller blocks, if possible one/two of the following.

206-NXX-[REDACTED]
206-NXX-[REDACTED]
206-NXX-[REDACTED]

Please advise when/if these will be allocated so we can proceed with the setup and implementation of the E911 service.

Thank you



allstream®

Allstream
18110 SE 34th Street
Building One, Ste 100
Vancouver, WA, 98683

1-855-299-7050
www.allstream.com
@Allstream

Attachment B

Tracking Number: **206-SEATTLE-WA-1128136**Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**Full NXX: Pool
Replenishment**Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM**

Headquarters Address: **18110 SE 34th St. Building One, S**

City: **Vancouver** State: **WA** ZIP: **98683**

Contact Name: **Jeanne Bell**

Contact Address: **18110 SE 34th St. Building One, Suite 100**

City: **Vancouver** State: **WA** ZIP: **98683**

Phone: **360-558-4159** Fax: **503-943-3346**

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

Pooling Administrator:ⁱⁱ

Contact Name: **Kevin Gatchell**

Contact Address: **1800 Sutter St**

City: **Concord** State: **CA** ZIP: **94520**

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

E-mail: **kevin.gatchell@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN neededⁱⁱⁱ: NPA: **206** LATA: **674** OCN^{iv}: **7173** Parent Company's OCN **7171**Number of Thousands-Blocks Requested : **2**Switch Identification (Switching Entity/POI^v): **TKWLWAZSPS0**

Rate Center^{vi}: SEATTLE

1.3 Dates:

Date of Application^{vii}:
11/06/2018

Requested Effective Date^{viii}:
01/11/2019

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-xxx-1, 206-xxx-2
- 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^{ix} Switching Id Part 1B
- OCN: Inter-company^x 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) or by contacting inc@atis.org as of the date of this application.

Jeanne Bell	Number Administrator	11/06/2018
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 (iconectivTM) LERGTM Routing Guide^{xi}. 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 iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service

provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA CO Code application will also need to be submitted to the PA.

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ Code of the switch /POI.

^{vi}Rate Center name must be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 206-SEATTLE-WA-1128136

Date of Application: 11/06/2018 Effective Date: _____
Date of Receipt: 11/06/2018 Date of Response: 11/06/2018

Service Provider Name: ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM
(LERGTM Routing Guide¹) OCN: 7173
Parent Company OCN: 7171

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)²: _____

TKWLWAZSPS0

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:

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

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

allstream®

Allstream
18110 SE 34th Street
Building One, Ste 100
Vancouver, WA, 98683

1-855-299-7050
www.allstream.com
@Allstream

Attachment C

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 206-SEATTLE-WA-1128136

Date: Tuesday, November 6, 2018 OCN: 7173 Company Name: ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM

Rate Center: SEATTLE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: NPA NXX BLK ID 206 204 8 206 209 4 & 5 206 245 1 206 257 6 206 387 4 206 388 0 & 1 206 392 0 through 9 206 436 0 through 3, 5 through 8 206 452 8 206 454 2, 3 & 7 206 456 9 206 462 7 206 474 1 & 2 206 489 1 206 529 3 206 582 3 & 4 206 602 1 206 606 1, 2, 4 through 8 206 631 8 206 639 6 206 658 2 206 696 7 206 702 9 206 708 8 206 724 0 206 744 0 through 9 206 787 8 206 788 3 & 4 206 805 0 through 8 206 812 0 through 9 206 816 1 & 8 206 829 1, 2 & 7 206 858 7 206 859 2 206 923 7 206 957 0 through 9 206 965 1 206 971 0, 3, 4, 5, 7 & 8 206 973 1, 4 and 5 206 995 8 For a total of 114 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: 11205

B. Assigned Numbers: 102795

C. Total Numbering Resources: 114000

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

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

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

E. Growth History - Previous 6 months⁴

0	0	0	50	0	27
----------	----------	----------	-----------	----------	-----------

F. Forecast - Next 12 months⁵

1400	5	5	5	5	5	5	5	5	5	5	5	5
-------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):**237.5**

H. Months to Exhaust⁶

Numbers Available for Assignment to Customers (A)

=

Average Monthly Forecast (G)

Block Requested	Available Numbers	Months To Exhaust
1	11205	47.179
2	12205	51.389

I. Utilization⁷

Assigned Numbers (B) X 100 = **90.171**

=

Total Numbering Resources (C)-Excluded Numbers (D)

Explanation: _____

¹A 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.

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

³Quantity 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).

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁶To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)
(ii))