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**Via Web Portal**

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: Seattle Rate Center Numbering Waiver**

Dear Ms. Maxwell:

By this letter Teleport Communications America, LLC (“TCAL”), OCN 7146, is requesting a waiver of the utilization and months-to-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 the Pooling Administrator (PA)/NANPA to assign 10 thousand blocks to TCAL to meet the needs of a specific customer.

Specifically, the customer has requested 10,000 telephone numbers in the Seattle Rate Center for the expansion of on-boarding doctors, nurses, and service providers. The customer’s Letter of Intent is attached as **Confidential Exhibit A** and the confidential information has been redacted pursuant to WAC 480-07-160 as it contains confidential information. TCAL cannot satisfy this request from its current numbering inventory.

Although AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block, AT&T’s existing numbering resources cannot satisfy the need for 10,000 numbers in the 206-area code. Thus, on August 17, 2023 AT&T submitted a Thousands Block Application Form Part 1A and a MTE and Utilization Certification Worksheet – TN Level to the Pooling Administrator (“PA”) for one thousands blocks in the Seattle rate center. The Pooling Administrator System (“PAS”) denied AT&T’s request because AT&T did not meet the required.

In our effort to satisfy the customer’s request, TCAL submitted a request to PA/NANPA on August 17, 2023, for additional numbering resources. That application Form 1A, the MTE/Utilization Worksheet and the subsequent denial are attached as **Confidential Exhibit B**. 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. Month-to-exhaust was 20.008 months; utilization was 76.582%. Note that information is redacted in both Exhibits A and B as both Exhibits include trade secrets that are not available to the public.

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/NANPA to accommodate our customer’s request.

All directives can be emailed or faxed directly to:

David Morgan  
NANPA Inc- PA Code Administrator  
Two Tower Center Boulevard, 20th Floor  
East Brunswick, NJ 08816  
Phone 571-363-3823  
Fax: 571-363-3838  
Email: [dmorgan@nanpa.com](mailto:dmorgan@nanpa.com)

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact me at 775-527-4252. I would appreciate being copied on any correspondence with PA/NANPA.

Sincerely,



David Collier

Enclosures