



*Local Telephone Services – Internet & Broadband – Long Distance
Security & Alarms – Data Center Services*

December 1, 2011

BY WUTC WEB PORTAL

Mr. David W. Danner
Executive Director & Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Dear Mr. Danner:

Re: Numbering Resources “Safety Valve” Request -
South Whidbey Rate Center

By this letter, Whidbey Telephone Company (“Company”) respectfully requests that the Washington Utilities and Transportation Commission (“Commission”) issue an order waiving the utilization and months-to-exhaust (“MTE”) thresholds set forth in the Federal Communications Commission (“FCC”) Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362, released December 29, 2000, and December 28, 2001, respectively, in CC Docket No. 99-200,¹ and allowing and directing the Number Pooling Administrator / NeuStar (“PA/NeuStar”) to assign a thousands-block of telephone numbers to the Company.

An error occurred in the printing of the yellow pages portion of the Company’s November 2011 published telephone directory, resulting in publication of an incorrect telephone number for a business customer. While the erroneously printed number is within an NPA-NNX code for which the Company is the “code holder,” it is also within a thousands-block that the Company donated to the PA/NeuStar for number pooling purposes in August 2010.² The Company would like to have the ability to cause the erroneously printed number to be “ported in” to the Company as part of a remedy for the situation, but without the relevant thousands-block being reassigned to the Company by the PA/NeuStar, the Company is not able to do so.

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¹ See also 47 C.F.R. § 52.15.

² The erroneously printed telephone number is within the thousands-block 360-730-7.

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By application dated November 15, 2011, the Company submitted a request to the PA/NeuStar for reassignment of the subject thousands-block to the Company; that request was denied by the PA/NeuStar by written denial also dated November 15, 2011. A copy of that written denial accompanies this letter.

As of the date of this letter, the PA/NeuStar's website indicates that the PA/NeuStar currently holds thirty-one (31) thousands-blocks in the South Whidbey Rate Center, within which 919 telephone numbers are not available for assignment.³ Within the thousands-block sought by the Company, twenty-seven (27) telephone numbers are not available for assignment.⁴ If the request set forth in this letter is granted, the count of unavailable numbers in that thousands-block will increase by one – to twenty-eight (28): of the available numbers in that thousands-block, the Company intends to retain only the one telephone number mentioned above, and to re-donate the subject thousands-block back to the PA/NeuStar for number pooling purposes. The 2011-2 NRUF and NPA Exhaust Analysis, dated October 2011, shows the forecast exhaust for NPA 360 as being in 2017:Q1.⁵

The FCC's Third Report and Order (FCC 01-362) referenced above established a "safety valve" process, pursuant to which the FCC delegated to state commissions the authority to hear claims that a safety valve should be applied when the Pooling Administrator (or NANPA) denies a specific request for numbering resources and the authority to direct the Pooling Administrator (or NANPA) to assign additional

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³ A copy of a print-out of the referenced data from the PA/NeuStar's website (https://www.nationalpooling.com/pas/public/block_reports_step1.do?method=blockReport) accompanies this letter.

⁴ These twenty-seven (27) telephone numbers were "contamination" (*i.e.*, assigned telephone numbers) present in the block at the time that it was donated by the Company to the PA/NeuStar in August 2010.

⁵ The referenced report was obtained at the following URL: http://www.nanpa.com/pdf/NRUF/October_2011_NPA_Exhaust_Projections.pdf. A copy of that report accompanies this letter. The projected exhaust of NPA 360 is shown on page 2 thereof.

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numbering resources to carriers that have demonstrated a verifiable need for additional numbering resources outside of the instances specifically enumerated by the FCC.⁶ The Company respectfully submits that the above-described circumstances constitute a situation warranting the Commission's exercise of its safety valve authority.

Based upon the foregoing and the documents that accompany this letter, the Company respectfully requests that the Commission grant the above request for a waiver of the utilization and MTE thresholds for the South Whidbey Rate Center and direct the PA/NeuStar to assign the 360-730-7xxx thousands-block to the Company. If granted, such directive to the PA/NeuStar may be e-mailed, faxed or mailed directly to:

Mr. Kevin Gatchell
NeuStar PA/Code Administrator
1800 Sutter Street
Concord, CA 94520
Telephone: (925) 363-8742
Fax: (925) 363-7692
E-mail: Kevin.Gatchell@NeuStar.biz

I would appreciate receiving a copy of any directive or other correspondence that the Commission may transmit to the PA/NeuStar pertaining to this matter. Please do not hesitate to contact me if the Commission has any questions or

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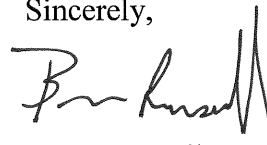
⁶ See FCC 01-362, ¶¶ 61-66. The instances specifically enumerated by the FCC included (i) numbering resource requirements of carriers experiencing rapid growth in a given area, and (ii) requests by carriers that receive a specific customer request for numbering resources that exceeds their available inventory. See FCC 01-362, ¶ 61.

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concerns regarding the above request or the information set forth in this letter and its accompanying documents.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Russell". The signature is stylized with a large initial "B" and a long, sweeping horizontal line.

Bruce Russell
Chief Operating Officer

Accompanying Documents