



April 29, 2016

Mr. Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

2016 APR 29 AM 10:13
RECORDS MANAGEMENT
STATE OF WA
UTIL. AND TRANSPORTATION COMMISSION

Re: Safety Valve Waiver Request for a dedicated code in the Renton Rate Center

Dear Mr. King,

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (“MCImetro”) respectfully requests a waiver of the federal utilization requirements¹ and that the Washington Utilities and Transportation Commission (“Commission”) direct the Pooling Administrator to assign a non-pooled dedicated central office code to MCImetro so that MCImetro can meet the specific needs of its customer. To support this request, the customer’s letter and the customer’s end-user’s letter documenting these needs is provided in Confidential Attachment A pursuant to WAC-480-07-160. This attachment is confidential due to proprietary customer information.

The 425 area code is not forecasted to exhaust for almost 25 years (first quarter of 2040), and there are 255 codes left available for assignment in the 425 area code. The customer needs the dedicated code for a new location, and thus has no numbers to transfer or return to MCImetro. MCImetro’s customer is a registered CLEC in Washington, but has requested the dedicated code from MCImetro so that the customer can provide alternate routing and diversity, as well as disaster recovery solutions to its end users, in addition to the numbers and service that the customer itself is providing to its end user.

The customer will begin placing numbers from the new dedicated code into service as soon as the numbers become effective. Federal rules require a service provider to place a code or block in service within six months of the LERG effective date.² Should the customer be unable to utilize all 10,000 numbers in the dedicated code within a reasonable amount of time, MCImetro will return any unused thousands-blocks to the Pooling Administrator. MCImetro will monitor the activation of these numbers and report their status in its NRUF filings, consistent with federal requirements and with the Numbering Resource Utilization/Forecast (NRUF) Guidelines.³

¹ See 47 CFR § 52.15 (g) (4) (ii)

² In Service is defined as “A code or block for which local routing information appears in the LERG Routing Guide, and one or more telephone numbers within the NXX code or NXX-X block has been Assigned to an end user (FCC 00-104, ¶240). Numbers that are categorized as Administrative, Aging, Intermediate, Reserved, or Available cannot also be Assigned and do not satisfy the In Service requirement.” See the Central Office Code (NXX) Assignment Guidelines available at <https://www.atis.org/docstore/product.aspx?id=27882>.

³ See the North American Numbering Plan Numbering Resource Utilization/Forecast (NRUF) Guidelines available at <https://www.atis.org/docstore/product.aspx?id=27884>. Consistent with the FCC’s recent clarification on reporting Intermediate

In conformance with the Thousands Block Number (NXX-X) Pooling Administration Guidelines⁴ and in its effort to satisfy this customer's request, MCImetro submitted its Part 1A application for a dedicated central office code to the Pooling Administrator on April 22, 2016. That application, the Appendix 3 months-to-exhaust worksheet and the subsequent Part 3 denial have been provided as Confidential Attachment B pursuant to WAC 480-07-160. In order for the application to be approved, MCImetro requires a waiver of the 75% utilization threshold for growth numbering resources.

The Federal Communications Commission ("FCC") allows for a waiver of the rules when carriers do not meet the utilization threshold but demonstrate a verifiable need for additional resources, such as this situation to satisfy a specific customer request for a dedicated code.⁵ The FCC has delegated authority to state commissions to hear claims for waivers, and directs state commissions to act as expeditiously as possible.⁶

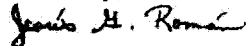
MCImetro respectfully requests that this waiver be heard at the May 12th, 2016 open meeting. We request the Commission grant MCImetro's request for a waiver of the federal utilization requirements, and direct the Pooling Administrator to assign the 425-690 central office code as a non-pooled dedicated code in the Renton rate center to MCImetro so that MCImetro can accommodate its customer's request. In the event that the 425-690 code is no longer available for assignment at the time that MCImetro submits, and the PA processes its application, MCImetro requests that the WUTC direct the PA to assign the 425-665 central office code to MCImetro.

Directives to the Pooling Administrator can be emailed or faxed directly to:

Kevin Gatchell
Senior Pooling Specialist
Neustar, Inc.
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 949-286-7202. We would appreciate being copied on any correspondence with the Pooling Administrator.

Sincerely,



Jesús G. Román
Assitant General Counsel, Verizon
15505 Sand Canyon Ave. D201
Irvine, CA 92618

numbers on NRUF in its Order 15-70, MCImetro will not simply report the entire dedicated code as Assigned unless every number meets the federal definition of Assigned. See also the definition of Intermediate and Assigned numbers in the NRUF Guidelines.

⁴ Available at <https://www.atis.org/docstore/product.aspx?id=27894>.

⁵ See FCC 01-362, ¶¶ 57-66

⁶ See FCC 01-362, ¶ 66

Proprietary and Confidential Attachments:

- Attachment A: Customer letter documenting need for a dedicated code in Renton, WA rate center
- Attachment B: MCImetro Part 1A application for dedicated code in Renton, WA rate center, Appendix 3 MTE Worksheet and Pooling Administrator's Part 3 Denial of MCImetro Part 1A application

INSERT TO

APRIL 29, 2016

SAFETY VALVE WAIVER REQUEST

FOR A DEDICATED CODE IN THE RENTON RATE CENTER

THE FOLLOWING TWO DOCUMENTS ARE CONFIDENTIAL

AND REDACTED IN THEIR ENTIRETY

MCImetro Access Transmission Services Proprietary & Confidential Attachment B

Central Office Code (NXX) Assignment Request
Part 1 July 19, 2010

Tracking Number: **425-RENTON-WA-916840**

Full NXX:
Dedicated
Customer

Type of Application: New Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC**

Headquarters Address: **22001 Loudoun County Parkway**

City, State, Zip: **Ashburn, VA, 20147**

Contact Name: **Godfrey Chisanga**

Contact Address: **2400 N Glenville Dr**

City, State, Zip: **Richardson, TX, 75082**

Phone: **972-729-5103** Fax: **972-729-5156**
E-mail: **godfrey.chisanga@verizonbusiness.com**

Code Administrator:²

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City, State, Zip: **Sterling, VA, 20166**

Phone: **571-434-5381** Fax: **571-434-5502**

1.2 NPA: **425** NXX:³ LATA: **674** OCN:⁴ **7229**
Parent Company's OCN(s) **7229**

Switching Identification (Switching Entity/POI)⁵
STTLWAWBDS0

Locality/City/Wire Center: Rate Center:⁶
RENTON

Homing Tandem Operating Co.:⁷ Tandem Homing
QWEST CORPORATION CLLITM⁸: **STTLWA0303T**

1.3 Dates: Date of Application: 04/22/2016

Requested Effective Date: ^{9 10} 06/08/2016

✓ 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.

Request Expedited Treatment Yes X No _____ Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation: Own AOCN expedite requested. Please assign earliest possible date

1.4 a) Type of company/entity requesting the code: CAP OR CLEC
(LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) 425-690

d) Codes that are undesirable, if any _____

e) Type of change (Mark all that apply)

OCN-Intra-company ¹¹	Switching Id	Rate Center	
Tandem Homing CLLI			
OCN-Inter-company ¹²	Effective Date	LATA	Extend
Reservation			

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application. ¹⁴

<u>Godfrey Chisanga</u>	<u>Snr Network Engineer</u>	<u>04/22/2016</u>
Signature of Code Applicant	Title	Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character iconectiv COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc. dba iconectiv)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ An incomplete form may result in delays in processing this request.

Appendix 3

January 12, 2015

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

Tracking Number: 425-RENTON-WA-916840

Date: Friday, April 22, 2016 OCN: 7229

Company Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC

Rate Center: RENTON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: [425-873]-1,2,3,5,9,A

Name of Block Applicant: Godfrey Chisanga

Signature: Godfrey Chisanga

Title: Snr Network Engineer 972-729-5156

Telephone No.: 972-729-5103-

FAX No.:

E-Mail: godfrey.chisanga@verizonbusiness.com

A. Available Numbers: 1690

B. Assigned Numbers: 3223

C. Total Numbering Resources: 5000

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 #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
<u>-42</u>	<u>8</u>	<u>123</u>	<u>80</u>	<u>32</u>	<u>19</u>						

E. Growth History - Previous 6 months⁴

F. Forecast - Next 12 months⁵ 10033 33 33 33 33 33 33 33 33 33 33 33

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 1699.667

H. Months to Exhaust⁶ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	1690	0.994

I. Utilization⁷ = $\frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{64.46}$

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. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 425-RENTON-WA-916840

Date of Application: 04/22/2016 Effective Date: _____

Date of Receipt: 04/22/2016 Date of Response: 04/22/2016

Service Provider Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC

(iconectiv™ LERG™ Routing Guide) OCN: 7229

Parent Company OCN: 7229

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 : _____

STTLWAWBDS0

Switch Identification(Switch Entity/POI): ¹

Rate Center:

RENTON

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 the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)