



Greg Rogers

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March 23, 2020

Submitted Via Web Portal

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Olympia, WA 98504-7250

Received
Records Management
03/23/2020 09:54
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Olympia Rate Center Numbering Order Waiver Request

Dear Mr. King:

By this letter Bandwidth.com CLEC, LLC (“Bandwidth”), OCN 006F, is requesting a waiver of the standard utilization and months-to-exhaust requirements outlined in the 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)/Somos to assign ten (10) one-thousands blocks to Bandwidth to meet the needs of a specific customer.

Specifically, the customer has requested 10,000 telephone numbers in the Olympia Rate Center to enable a mass migration of end-users to Bandwidth’s and its customer’s Internet Protocol-based (“IP”) communications platforms. Bandwidth’s 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 competitively sensitive confidential information.

Bandwidth cannot satisfy this request from its current numbering inventory.

There are currently seven (7) non-contiguous blocks in the Olympia Rate Center pool.

Therefore, a new code must be opened to satisfy this request. Bandwidth will activate three (3) of the one-thousand blocks from this new code and the other seven (7) will be utilized from the number pool for the Olympia Rate Center.

Bandwidth submitted a request to PA/Somos on March 19, 2020 for additional numbering resources. That application Form 1A, the MTE/Utilization Worksheet and the subsequent denial are also included here as Exhibit B.

To satisfy its customer's critical need, Bandwidth is submitting this request to waive the current month-to-exhaust and utilization thresholds for new numbering requests. Bandwidth's current utilization percentage in its available thousand block is 60.45%.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request. 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 state commissions and recommends that state commissions act expeditiously on these requests. The Order proposes that state commissions review a waiver request within 10 business days. (See ¶¶ 61, 66).

Bandwidth respectfully requests that the Commission approve this request for a waiver of months to exhaust and rate center utilization requirements, and direct PA/Somos to allocate seven available blocks, open a new code and assign three (3) one-thousands blocks to Bandwidth to accommodate this specific customer request.

All directives related to this request can be sent or copied via email or fax directly to:

Kevin Gatchell
Somos Inc- PA Code Administrator
1800 Sutter Street
Concord, CA 94520
Phone 925-420-0344
Fax: 925-420-0377
Email: kgatchell@somos.com

Bandwidth and its customer very much appreciate your prompt attention to this matter. Should you have any questions or concerns regarding this request please do not hesitate to contact me at grogers@bandwidth.com or 303-246-7715. We would also appreciate being copied on any correspondence you may need to have with PA/Somos.

Sincerely,

_____/S/____

Greg Rogers

Attachments