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Via Web Portal

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

RE: Tacoma Rate Center Numbering Waiver

Dear Mr. Killip:

Teleport Communications America, LLC (TCAL), OCN 7146, is requesting a waiver of the utilization 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 1 thousand blocks to meet the needs of a specific customer.

Specifically, the customer has requested 1,000 telephone numbers in the Tacoma Rate Center to support migration to a new platform to accommodate the growing requirements of [REDACTED]. The customer's Letter of Intent is attached as **Confidential Exhibit A** and 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 TCAL has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block, TCAL's existing numbering resources cannot satisfy the need for 1,000 numbers in the 253-area code. Thus, on December 10, 2024, TCAL 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 Tacoma rate center. The Pooling Administrator System ("PAS") denied AT&T's request because TCAL did not meet the required Months to Exhaust and/or Utilization requirements.

In our effort to satisfy the customer's request, TCAL submitted a request to PA/NANPA on December 10, 2024, for additional numbering resources. That application Form Part 1, 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 43.086 months; utilization was 53.465%. Note that information is

Mr. Killip
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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 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 directly to:

Kevin Gatchell
NANPA Inc- PA Code Administrator
Phone 925-420-0344
Email: kgatchell@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

Exhibit A

[REDACTED]

[REDACTED]

IN REPLY REFER TO

[REDACTED]

Dear [REDACTED],

[REDACTED] has modernized its communications capabilities at [REDACTED] based upon [REDACTED] [REDACTED] guidelines which include migration to VoIP access for commercial voice services. AT&T has been selected as the local services provider for VoIP Trunking services and an order has been placed for the equivalent of [REDACTED] in concurrent call capacity along with a request for a block of 1,000 new contiguous telephone numbers.

The requested block of 1,000 contiguous public telephone numbers is required for compatibility with the existing [REDACTED] dial plan and to support migration to the new platform without impacting operations. Furthermore, [REDACTED] directly supports the [REDACTED] [REDACTED] as its primary customers.

[REDACTED] is requesting that a block of 1,000 contiguous DID's be allocated to AT&T with TACOMA, WA Rate center to accommodate the growing requirements of [REDACTED]. The support of AT&T Business in issuing the requested 1,000 block is critical to achieving this goal.

The requested DID's will be direct extension dial. In addition, there will be tremendous use of DID's for such application as voice conferencing, audio/visual, call centers for external advisories, etc.

A non-contiguous DID range or a block of fewer numbers will seriously impact [REDACTED] operational capabilities at [REDACTED] and the services provided to [REDACTED] staff. If the Commission is not able to assign a new contiguous 1,000 DID block, we will not be able to align our dial plan to [REDACTED] standards which will have a tremendously adverse impact on [REDACTED] [REDACTED], training, and support.

Should there be any question or concerning the aforementioned, please do not hesitate to contact me promptly.

The technical point of contact for this action is [REDACTED]
[REDACTED]

The point of contact for this action is the undersigned, [REDACTED].

[REDACTED]

Exhibit B

Tracking Number: 253-TACOMA-WA-3024256

Thousands-Block (NPA-NXX-X) and Central Office Code (NPA-NXX) Application - Part 1

Revised: October 28, 2024

Type of Application: New Modification¹ Disconnect

1.0 Applicant Contact Information

Service Provider OCN Name: TELEPORT COMMUNICATIONS AMERICA, LLC - WA

Headquarters Address: 600 nw 79 ave room 336

City: miami

State: FL

ZIP: 33126

Contact Name: Aida Armesto

Contact Address: 600 nw 79 ave room 336

City: miami

State: FL

ZIP: 33126

Phone: 786-927-2782

E Mail: aa5264@att.com

1.1 North American Numbering Plan Administrator²

Contact Phone: 866-623-2282

E Mail: support@nanpa.com

1.2 General Information

NPA: 253

NXX³:

X⁴:

LATA: 674

Service Provider OCN⁵: 7146

OCN Category⁶: CLEC

Parent Company OCN: 7125

Number of Thousands Blocks Requested: 1

Switching Identification (Switching Entity/POI) CO Code⁷:

Switching Identification (Switching Entity/POI) Thousands Block⁸: PLSBWAXXQMD

Rate Center⁹: TACOMA

Homing Tandem Operating Company¹⁰:

Tandem Homing CLLI^{TM11}:

1.3 Dates

Date of Application: 12/10/2024

Requested Effective Date CO Code^{12,13}:

By selecting this checkbox, I acknowledge that I am requesting an effective date 52 calendar days from the date the Administrator processes the request.

Request Expedited Treatment CO Code: Yes No

Expedite documentation must be provided when is "Request Expedite" = Yes and your company is not its own AOCN.¹⁴

Expedite Explanation:

Requested Effective Date Thousands-Block¹⁵: 01/10/2025

By selecting this checkbox, I acknowledge that I am requesting an effective date 24 days from the date the Administrator processes the request.

Request Expedited Treatment Thousands-Block: Yes No

1.4 Thousands-Block/CO Code Information

CO Code Assignment Preference:

CO Codes that are Undesirable, if any:

Code Applicant Responsibility

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

Thousands Block(s) Assignment Preference: 253-412-5

Thousands Block(s) that are Undesirable, if any:

By selecting this checkbox, I acknowledge that I am willing to accept a Thousands Block where the underlying CO Code may not yet be activated in the PSTN and loaded in the NPAC on the Thousands Block effective date.¹⁶

1.5 Type of Request (Initial or Growth)

Initial Thousands Block and/or CO code for the rate center: Yes

If yes, attach evidence of authorization and proof of capability to provide Service within 60 days.

Growth Thousands Block and/or CO Code for the rate center: Yes

If yes, attach months to exhaust worksheet.

Pool Indicator¹⁷: Yes No

Update BIRRDS/LEGG¹⁸: Yes No

1.6 Modification

OCN: Intra-Company¹⁹ Switching Id Tandem Homing CLLI
 OCN: Inter-Company²⁰ Part 1B Effective Date
 Rate Center Add New ISP Thousands-Block Port

1.7 Disconnect

Is this Thousands-Block Contaminated: Yes No

If yes, are there over 100 ported TNs: Yes No

If yes, are you exiting the market: Yes No

I acknowledge I have completed all Intra SP ports in the NPAC and protected the Thousands-Block from further assignment.

Comments:

1.8 Certification Statement

I hereby certify that the information on this application is true and accurate to the best of my knowledge, and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) posted to the ATIS web site (<http://www.atis.org>) as of the date of this application.²¹

Signature of Applicant: Aida Armesto

Date: 12/10/2024

Instructions for filling out each Section of the Part 1 form:

Section 1.0: Contact information requires that Service Providers (SP) supply under "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 phone and e-mail address.

Section 1.2: The SP shall supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the iconectiv[®], LLC LERG[™] Routing Guide²². The Operating Company Number (OCN) assigned to the SP 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 iconectiv Telecom Routing Administration (TRA). The Switch Identification (Switching Entity/POI) and for Central Office (CO) Code requests the **Tandem Homing CLLI^{™23}** shall also be entered. Explanations of these terms may be found in the footnotes. In addition, when requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center the number of Thousands-Blocks requested shall be supplied.

Section 1.3: The date the Service Provider (SP) completes the application shall be entered in this section. For Central Office (CO) Code requests the Effective Date of the requested CO Code shall be entered. For Thousands-Block requests and CO Code requests for LRN or Pool Replenishment a Pooling Rate Center the Effective Date of the requested Thousands-Block shall be entered.

Section 1.4: For Central Office (CO) Code request, the Service Provider (SP) may indicate their preference for a particular CO Code, e.g., 321-6XX, or indicate any CO Code that may be undesirable, e.g., 321-6XX. When requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center, SPs may indicate their preference for a particular Thousands-Block, e.g., NPA- 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., NPA-321-6XXX.

Section 1.5: Service Providers (SP) indicate the type of request. Initial requests are for first applications for a Thousands-Block and/or Central Office (CO) Code in a Rate Center, Growth applications are for additional Thousands-Blocks and/or CO Codes 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 (SP) indicate when the request is for a modification and the type of change. Rate Center and Tandem Homing CLLI changes only apply to Central Office (CO) Codes. Part 1B changes only apply to Thousands-Blocks.

Section 1.7: Service Providers (SP) indicate when the request is for a disconnect. When the request is to disconnect a Thousands-Block, SPs shall also indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the North American Numbering Plan Administrator (NANPA) shall seek a new Thousands-Block Holder.

¹ Identify type and reason for change(s) in Section 1.6.

² The contact information for the North American Numbering Plan Administrator (NANPA) may be located at <https://www.nanpa.com>.

³ The NXX field is required for any Thousands-Block or Central Office (CO) Code modification or disconnect.

⁴ The X field is required for any Thousands-Block modification or disconnect.

⁵ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments and Thousands-Block (NPA-NXX-X) 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 Telecom Routing Administration (TRA) on 732-699-6700.

⁶ Each OCN is categorized to identify the type of company associated with a Company Code / OCN. Such information for a particular OCN is available in the LERG™ Routing Guide (LERG 1 table).

⁷ This is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the eleven-character iconectiv® Common Language Location Identification (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.)

⁸ This is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the eleven-character iconectiv® Common Language Location Identification (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.)

⁹ Rate Center name shall be a tariffed Rate Center associated with toll billing and in the LERG™ Routing Guide.

¹⁰ Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

¹¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

¹² Central Office (CO) Code Applicants should request an effective date that is at least 59 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 CO Code. Such arrangements are outside the scope of these guidelines.

¹³ Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

¹⁴ When your company is its own AOCN please provide the following in the remarks field: I act as my own AOCN and agree to reduce the input timeframe to [enter days]. When your company is not its own AOCN please provide the AOCN's acknowledgement and agree to reduce the input timeframe to [enter days] and expedite letter from your homing tandem operating company when requesting a new CO Code.

¹⁵ Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

¹⁶ In NAS, Thousands-Blocks from CO Codes not activated in the PSTN are identified as Available Pending (AP) on reports.

¹⁷ The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling or indicate "No" if the CO Code being requested shall be used for a non-pooled CO Code or a dedicated customer where the Thousands-Block will not be built in BIRRDs.

¹⁸ The Applicant shall indicate "Yes" if the Dedicated Customer Central Office (CO) Code being requested, or the Thousands-Block being ISP Thousands-Block Ported, shall be identified as Thousands-Block Number Pooled in BIRRDs/LERG™ and have all 10 Thousands-Block records built. The Applicant shall indicate "No" if the CO Code being requested shall be used as a non-pooled CO Code for a Dedicated Customer or the Thousands-Blocks being ISP Thousands-Block Ported shall not be identified as Thousands-Block Number Pooled in BIRRDs/LERG™ and have all 10 Thousands-Blocks built.

¹⁹ Select if you are the current Thousands-Block or Central Office (CO) Code Holder

²⁰ Select if you are not the current Thousands-Block or CO Code Holder

²¹ The Thousands-Block/Central Office (CO) Code applicant certifies veracity of this form by signing their name, and providing their title and date.

²² iconectiv®, LLC and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.

²³ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

Tracking Number: 253-TACOMA-WA-3024256

Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 1

Revised: October 28, 2024

(worksheet to be used for Requests for Additional Thousands-Blocks and CO Codes for Growth)

Date: 12/10/2024

Service Provider OCN: 7146

Service Provider OCN Name: TELEPORT

Rate Center: TACOMA

COMMUNICATIONS AMERICA, LLC - WA

List all CO Codes NPA(s)-NXXs and Thousands-Blocks NPA(s)-NXX-X(s)²: 253-212-4, 253-310-0, 253-310-4, 253-310-9, 253-503-2, 253-503-4, 253-503-5, 253-503-8, 253-620-1, 253-620-2, 253-620-3, 253-620-4, 253-620-5, 253-620-6, 253-620-7, 253-620-8, 253-620-9

Name of Applicant: Aida Armesto

Phone: 786-927-2782-null

E-Mail: aa5264@att.com

A. Available Numbers³: [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources⁴: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: 0

List excluded CO Code(s) or Thousands-Block(s):

E. Previous 6 month growth history⁶:

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

F. Forecast Next 12 months⁷:

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

G. Average Monthly Forecast (Sum of months #1 6 (Part F above) divided by 6)⁸: [REDACTED]

H. Months to Exhaust⁹:

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

Block Requested	Available Numbers	Months to Exhaust
1	\blacksquare	\blacksquare

I. Utilization¹⁰:

$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) - Excluded Numbers (D)}} \times 100 = \blacksquare$$

Explanation:

¹ A copy of this worksheet is required to be submitted to the North American Numbering Plan Administrator (NANPA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

² List all Numbering Resources allocated to the Service Provider OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources Report in NAS and shall automatically populate on this form in NAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³ The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴ The total quantity of Numbering Resources allocated to the Service Provider OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in NAS and shall automatically populate on this form in NAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵ Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e.g.: 2 Thousands-Blocks received = 2,000 and 1 CO Code received = 10,000).

⁶ Net change in Telephone Numbers (TN) 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.

⁷ Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸ This field is automatically calculated and populated on this form in NAS.

⁹ This field is automatically calculated and populated on this form in NAS. To be assigned an additional Thousands- Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰ This field is automatically calculated and populated on this form in NAS. To be assigned an additional Thousands- Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

Tracking Number: 253-TACOMA-WA-3024256

Administrator's Response/Confirmation - Part 3

Revised: October 28, 2024

Date of Application: 12/10/2024

Effective Date:

Date of Response: 12/10/2024

Request Approved

Request Suspended

Request Withdrawn

Request Denied

Administrator Comments:

The Months to Exhaust (MTE) and/or Utilization requirements were not met. This Part 3 denial may be used to request a state waiver from the appropriate state commission.

If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

NPA, NPA-NXX, NPA-NXX-X: 253

Rate Center: TACOMA

State: WA

Assigned

Modified

Disconnected

Thousands-Block Contaminated: Yes No

If yes, the number of TNs contaminated (1-1000):

Reserved

Reservation Expiration Date:

de Forms

Service Provider OCN Name: TELEPORT COMMUNICATIONS AMERICA, LLC - WA

Service Provider OCN: 7146

OCN Category: CLEC

Parent Company OCN: 7125

NPAC SPID:

Switching Identification (Switching Entity/POI): PLSBWAXXQMD

Tandem Homing CLLI™:

Applicant Contact Name: Aida Armesto

Phone: 786-927-2782

Email: aa5264@att.com

Administrator Contact Name: Kevin Gatchell

Phone: 925-420-0344

Email: kgatchell@nanpa.com