

UT-041361 (NR)
8-25-04



July 28, 2004

Ms. Carole J. Washburn,
Executive Secretary
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Subject: AT&T Safety Valve Request for Bellevue Rate Center

Ms. Washburn,

AT&T respectfully submits this request for Application of the "safety valve" for NXX-X Acquisition in the state of Washington. By this letter, AT&T requests that the Washington Utilities and Transportation Commission ("Commission") overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of AT&T's application for blocks of telephone numbers and that the Commission authorize the PA to release the requested numbers to AT&T so that AT&T may serve its customer.

This request is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. 52.15(g)(4) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").¹

¹ These guidelines may be found on the INC web site:
<http://www.atis.org/atis/clc/INC/Incdocs.htm>

A Washington customer of AT&T has requested that AT&T provide numbers from three thousands-blocks for its place of business in the Bellevue rate center.² AT&T has developed a communications plan that the customer will implement, and consequently, the customer will assign the numbers soon after AT&T makes them available. The customer's dial plan requires the NXX be from the 425 NPA and more specifically must end with 6 (e.g., NX6), and provide numbers in the 5, 6 and 8 blocks to meet specific needs.

On July 16, 2004, AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA for three blocks³ in the Bellevue rate center.

During the online session with the Pooling Administration System ("PAS"), AT&T received an error message indicating the request would not process through the system due to a utilization rate lower than the required percentage.⁴ The PA applies the FCC rules and INC Guidelines. These rules and guidelines require that a block holder requesting growth resources demonstrate that existing resources within the rate center will both exhaust within 6.0 months, and meet the 75% utilization level. The error message indicated the utilization level was not met.

Due to the nature of the customer's request, a new NXX will need to be opened meet their need. Despite an abundance of blocks available in the Bellevue

² AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions. See attached Company-Proprietary customer letter.

³ A copy of the Part 1A and MTE worksheet are appended. AT&T asks the Commission to treat the information contained as confidential by the Commission.

number pool, there are no combination of blocks that meet the NXX and blocks requested. The 425 NPA, as noted on the North American Numbering Plan Administrator ("NANPA") web site⁵, has approximately 302 available NXXs and an exhaust date more than twenty years in the future. Consequently, the opening of a new NXX does not appear to result in more than a small incremental change in the life of the 425 NPA. If requested by the Commission, AT&T would attempt to donate uncontaminated or contaminated blocks in it's Bellevue rate center inventory up to a total of three to offset these proposed acquisitions.

AT&T respectfully requests that the Commission overturn the PA's decision expeditiously in the interest of our customer, as we are unable to satisfy the numbering needs of this customer without such an exception. Contact with the PA for the state of Washington may be made as follows:

Ms. Tara Farquhar, Pooling Administrator
NeuStar, Inc.
1800 Sutter Street
Concord, CA 94520
(925) 363-7654

Respectfully submitted,



Mark Lancaster
AT&T Numbering Resource Management
1111 Main Street, Suite 300
Kansas City, MO 64105
(816) 654-4383

⁴ A copy of the error message is appended. AT&T asks the Commission to treat the information contained as confidential by the Commission.

⁵ <http://www.nanpa.com/>

Pooling Administration System

 lloper (SP)

Sign Out

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **TELEPORT COMMUNICATIONS GROUP - SEATTLE**
Headquarters Address: **ONE AT&T WAY**
City: **BEDMINSTER**
State: **NJ**
Zip: **07921**

Contact Name **Ms Lisa A Loper**
Contact Address **ONE AT&T WAY**
City **BEDMINSTER**
Zip **07921**

State **NJ**

Telephone **(908) 234-7622**

Fax **(908) 234-8044**

E-mail **lloper@att.com**

Pooling Administrator :

Contact Name **Ms Tara Farquhar**
Contact Address **1800 Sutter St. Ste. 780**
City **Concord**
Zip **94520**

State **CA**

Telephone **9253637654**

Fax **9253637695**

E-mail **tara.farquhar@neustar.com**

1.2 General Information

LRN Needed **No**

NPA **425**

LATA * **674**

OCN **7146-TELEPORT COM SEATTLE**

Parent Company OCN * **7125**

Number of Thousands-Blocks Requested **3**

Switch Identification (Switching Identity/POI) * **RDMDWASYDS1**

City or Wire Center Name **RDMDWASY**

Rate Center **BELLEVUE**

Rate Center Sub Zone

1.3 Dates

**REDACTED AS PER
WAC 480-07-160**

Date of Application Friday, July 16, 2004

Requested Block Effective Date 16 Aug 2004

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider * CAP OR CLEC

b) Primary type of service Blocks to be used for * Wireline

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p>	<input type="text"/>	<input type="button" value=""/> >>>	<input type="button" value="Delete"/>
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>	<input type="text"/>	<input type="button" value=""/> >>>	<input type="button" value="Delete"/>

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request

Initial block for rate center Yes
 Growth block for rate center Yes
 Change block N/A
 Disconnect block N/A

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

Pooling Administration System

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Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Friday, July 16, 2004

OCN 7146

Company Name TELEPORT COMMUNICATIONS GROUP - SEATTLE

Rate Center BELLEVUE

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

425-945, 425-943, 425-586, 425-519

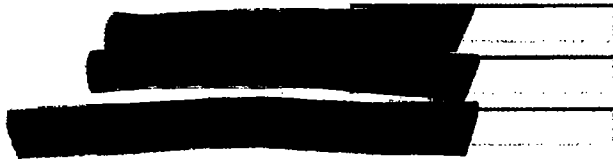
Name of Block Applicant Ms Lisa A Loper

Title Assistant Manager

Telephone Number (908) 234-7622

Fax Number (908) 234-8044

E-Mail lloper@att.com



D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation *

0

List excluded Code(s) or Block(s)

Empty rectangular box for listing excluded codes or blocks.

E. Growth History - Previous 6 months² *

Month 1	380	Month 2	380
Month 3	380	Month 4	380
Month 5	380	Month 6	380

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WAC 480-07-160

F. Forecast - Next 12 months³ *

Month 1	1628	Month 2	228
Month 3	228	Month 4	228
Month 5	228	Month 6	228
Month 7	228	Month 8	228
Month 9	228	Month 10	228
Month 11	228	Month 12	228

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 461.333

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested A. Available Numbers H. Months to Exhaust



I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 41.885


Explanation



1. A 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.
2. Net 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.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To 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, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(iii))

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WAC 480-07-160**

Pooling Administration System

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Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)


Your utilization calculates to **41.885 percent**, while your State requires a utilization of **75.000 percent**.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

**REDACTED AS PER
WAC 480-07-160**

Pooling Administration System

 lloper (SP)

[Sign Out](#)

Request Resources

State	<input type="text" value="WASHINGTON"/>
NPA	<input type="text" value="425"/>
Rate Center	<input type="text" value="BELLEVUE"/>
OCN	<input type="text" value="7146-TELEPORT COM SEATTLE"/>
Type of Application	<input type="text" value="Application for Individual Blocks"/>
Quantity of Blocks Requested	<input type="text" value="3"/>

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

**REDACTED AS PER
WAC 480-07-160**

[REDACTED]

[REDACTED]

[REDACTED]

July 8, 2004

CODE ADMINISTRATION

This Letter of Intent (LOI) is for [REDACTED] request services from AT&T Local Prime Service. [REDACTED] agrees to activate the numbers requested within 300 days from the date of assignment. Our service will be from the AT&T Local Service Switch: RDMDWASYDS1 servicing the Bellevue Rate Center: 425452.

The requested numbers must be consecutively available in 425/ XX6 exchange. And "6" be the third digit on the NXX. We are requesting following number ranges:
425-XX6-5000 to 6199
425-XX6-8000 to 8199

Sincerely,

Troy Olson Blair

[REDACTED]
Vice President, Information Technology
[REDACTED]
[REDACTED]

REDACTED AS PER
WAC 480-07-160

[REDACTED]