



Sharon Mullin
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March 19, 2020

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

Re: Seattle Rate Center Numbering Waiver

Dear Mr. King:

By this letter Teleport Communications America, LLC (TCAL), OCN 7146, is requesting a waiver of the utilization and months-to-exhaust 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)/Somos to assign 5 - thousands blocks to TCAL to meet the needs of a specific customer.

Specifically, the customer has requested 5000 telephone numbers in the Seattle Rate Center for the expansion of their Engineering and Sales Operations. The 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 confidential information. TCAL cannot satisfy this request from its current numbering inventory.

There are currently 4 non-contiguous contaminated blocks in the Seattle Rate Center pool. Therefore, a new code must be opened to satisfy this request. TCAL will activate 5 of the thousand blocks from this new code and the other 5 will replenish the number pool for the Seattle Rate Center.

TCAL submitted a request to PA/Somos on February 12, 2020 for additional numbering resources. That application Form 1A, the MTE/Utilization Worksheet and the subsequent denial are attached as **Confidential Exhibit B** and the confidential information has been redacted pursuant to WAC 480-070-160. To satisfy the customer's request, TCAL is submitting this request to waive the current month-to-exhaust and utilization thresholds for new numbering requests. Month-to-exhaust was 33.27 months; utilization was 77.41%. Note that information redacted in both Exhibits A and B is trade secret information that is not otherwise publicly available.

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).

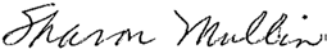
TCAL respectfully requests that the Commission approve this request for a waiver of months to exhaust and rate center utilization requirements, and direct PA/Somos to open a new code and assign 5 – thousands blocks to TCAL to accommodate a specific customer request.

All directives can be emailed or faxed directly to:

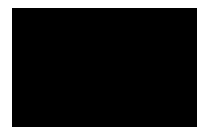
Kevin Gatchell
Somos Inc- PA Code Administrator
1800 Sutter Street
Concord, CA 94520
Phone 925-420-0344
Fax: 925-420-0377
Email: kgatchell@somos.com

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact me at 512-330-1698. I would appreciate being copied on any correspondence with PA/Somos.

Sincerely,


Sharon Mullin
Director – Regulatory Affairs

ATTACHMENT A



3/5/2020



AT&T TNAC,

This Letter of Intent represents a request by [REDACTED] for 5,000 CONSECUTIVE DID'S for Prime Service. [REDACTED] intends to order service, on our existing BVOIP service. DID's are to be Used / Installed at [REDACTED], Seattle Wa.

These new numbers will be used in the Seattle Rate Center.

[REDACTED] does not have a requirement for a specific range.

[REDACTED] continues to expand in building space as well as employees. [REDACTED] is adding additional buildings in the Seattle WA. area to cover the employee growth. Employee functions at this facility will consist of Engineering and Sales.

These additional numbers are needed to support the rapid growth of [REDACTED] in the Seattle WA area.

Sincerely,



ATTACHMENT B

Tracking Number: **206-SEATTLE-WA-1215450**Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019**Individual Block Request**Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - WA**

Headquarters Address: **5001 EXECUTIVE PARKWAY 3W200L**

City: **San Ramon** State: **CA** ZIP: **94583**

Contact Name: **Rowena Brown**

Contact Address: **5001 EXECUTIVE PARKWAY 3W200L**

City: **San Ramon** State: **CA** ZIP: **94583**

Phone: **925-543-1526** Fax: **925-355-9268**

E-mail: **rb2548@att.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Kevin Gatchell**

Contact Address: **1800 Sutter St**

City: **Concord** State: **CA** ZIP: **94520**

Phone: **925-420-0344** Fax: **925-420-0377**

E-mail: **kgatchell@somos.com**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____NPA: **206** LATA: **674** OCN^{iv}: **7146** Parent Company's OCN **7125**Number of Thousands-Blocks Requested : **5**Switch Identification (Switching Entity/POI^v):

PLSBWAXXQMDRate Center^{vi}: SEATTLE

1.3 Dates:

Date of Application^{vii}:
02/12/2020Requested Effective Date^{viii}:
03/17/2020Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 5000
consecutive TNs /5 pristine blocks please
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any contaminated/non consecutive blocks
- 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) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

- OCN: Intra-company^{ix} Switching Id Part 1B
- OCN: Inter-company^x Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____
- d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPA-NXX-X) 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) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rowena Brown

Senior Network Specialist

02/12/2020

Signature of Block Applicant

Title

Date

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

Section 1.1 Contact information requires that Service Providers (SP) supply under “Block 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 correct phone, fax, and e-mail address. The Pooling Administrator (PA) section also requires the SP to fill in the PA’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv[®]) LERG[™] Routing Guide^{xi}. 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). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) completes the application should be entered in this section, as well as the Effective Date of the requested Thousands-Block.

Section 1.4 Service Providers (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs may indicate their preference for a particular Thousands-Block, e.g., 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are for additional Thousands-Blocks 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) shall 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 Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, the request for return shall be denied.

The Thousands-Block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis 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 11 character CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii}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).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 206-SEATTLE-WA-1215450

Date: Wednesday, February 12, 2020 OCN: 7146 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - WA

Rate Center: SEATTLE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 206-268-1, 206-268-2, 206-268-3, 206-268-4, 206-268-5, 206-268-6, 206-268-7, 206-268-8, 206-268-9, 206-288-0, 206-288-1, 206-288-2, 206-288-4, 206-288-5, 206-288-6, 206-288-7, 206-288-8, 206-393-0, 206-393-1, 206-393-3, 206-393-4, 206-393-5, 206-393-6, 206-393-9, 206-473-3, 206-473-4, 206-473-5, 206-473-6, 206-544-0, 206-544-1, 206-544-2, 206-544-3, 206-544-5, 206-544-6, 206-544-7, 206-544-8, 206-544-9, 206-664-0, 206-664-2, 206-664-3, 206-664-4, 206-664-5, 206-664-6, 206-664-7, 206-664-8, 206-664-9, 206-676-0, 206-676-1, 206-676-3, 206-676-4, 206-676-5, 206-676-6, 206-676-7, 206-676-8, 206-676-9, 206-694-0, 206-694-1, 206-694-4, 206-694-5, 206-694-6, 206-694-7, 206-694-8, 206-695-0, 206-695-1, 206-695-3, 206-695-4, 206-695-5, 206-695-6, 206-695-7, 206-695-8, 206-695-9, 206-830-1, 206-830-2, 206-830-3, 206-830-4, 206-830-5, 206-830-6, 206-830-7, 206-830-9, 206-834-0, 206-834-1, 206-834-2, 206-834-3, 206-834-4, 206-834-7, 206-834-8, 206-834-9, 206-892-0, 206-892-1, 206-892-2, 206-892-3, 206-892-4, 206-892-5, 206-892-6, 206-892-7, 206-892-9, 206-946-3, 206-946-4, 206-252, 206-505, 206-655, 206-662, 206-674,

Name of Block Applicant: Rowena Brown

Signature: Rowena Brown


Title: Senior Network Specialist

Phone: 925-543-1526-

Fax: 925-355-9268

E-Mail: rb2548@att.com

A. Available Numbers³: 

B. Assigned Numbers: 

C. Total Numbering Resources⁴: 

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

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

E. Growth History - Previous 6 months⁶



F. Forecast - Next 12 months⁷



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

H. Months to Exhaust⁹
=

Numbers Available for Assignment to Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	[Redacted]	29.493
2	[Redacted]	30.437
3	[Redacted]	31.382
4	[Redacted]	32.327
5	[Redacted]	33.272

I. Utilization¹⁰
=

Assigned Numbers (B) X 100 = 77.41

Total Numbering Resources (C)-Excluded Numbers (D)

Explanation: _____

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

²List all Numbering Resources allocated to the 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 in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The 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).

⁴The total quantity of Numbering Resources allocated to the 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 PAS and shall automatically populate on this form in PAS. 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).

⁵Quantity 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 blocks received=2,000 and 1 code received =10,000).

⁶Net 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.

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

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

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

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) 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)).

COLLIER, DAVID A

From: kgatchell@somos.com
Sent: Wednesday, February 12, 2020 6:36 PM
To: BROWN, ROWENA R
Cc: PA_Part3@somos.com
Subject: , 206-SEATTLE-WA-1215450 DENIED PAS - Part 3A Confirmation

Pooling Administration System

Dated 12 February 2020

Pooling Administrator's Response/Confirmation - Part 3A
Revised: October 31, 2019

Tracking Number : 206-SEATTLE-WA-1215450

Date of Application: 02/12/2020 Effective Date: _____
Date of Receipt: 02/12/2020 Date of Response: 02/12/2020

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - WA
(LERG™ Routing Guide¹) 7146
OCN: _____
Parent Company OCN: 7125

NPAC SOA SPID : _____

Pooling Administrator Contact Information:
Kevin Gatchell Phone: 925-420-0344
Signature of Pooling Administrator
Kevin Gatchell Fax: 925-420-0377
Name (print)
Email: kgatchell@somos.com

 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 (1-1000):

Switch Identification (Switching/POI)²:

PLSBWAXXQMD

Rate Center:

SEATTLE

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. 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.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.