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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: Seattle 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 10 thousand blocks to meet the needs of a specific customer.

Specifically, the customer has requested 10,000 telephone numbers in the Seattle Rate Center to support the customer expansion of the AT&T BVoIP service to be able to provide service to its end user community. 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 AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block, AT&T's existing numbering resources cannot satisfy the need for 10,000 numbers in the 206-area code. Thus, on August 25, 2025, AT&T submitted a Thousands Block Application Form Part 1A and a MTE and Utilization Certification Worksheet – TN Level to the Pooling Administrator ("PA") for ten thousands blocks in the Seattle rate center. The Pooling Administrator System ("PAS") denied AT&T's request because AT&T did not meet the required.

In our effort to satisfy the customer's request, TCAL submitted a request to PA/NANPA on August 25, 2025, 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 22.231 months; utilization was 74.450%. Note that information is

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:
NANPA Inc- PA Code Administrator
Phone 866-623-2282
Email: support@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,

A handwritten signature in black ink, appearing to read "David Collier".

David Collier

Enclosures