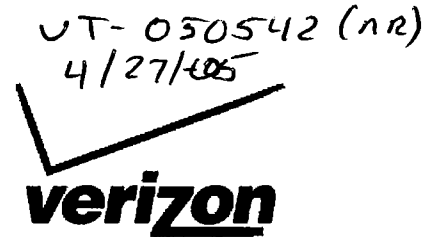


Lin Fogg  
Specialist – Regulatory

RECEIVED  
REGULATORY DIVISION

05 APR -6 11:10:21

STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION  
COMMISSION



Verizon Northwest Inc.  
1800 41st Street  
P.O. Box 1003  
Everett, Washington 98201  
Mailcode: WA0101RA

Phone 425 261-6380  
Fax 425 261-5262

April 6, 2005

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

**Subject: VERIZON REQUEST FOR ONE 10,000 NUMBER CODE**

Dear Ms. Washburn:

Verizon Northwest Inc. (Verizon) requests the Washington Utilities and Transportation Commission to direct the Pooling Administrator (PA) to provide Verizon with one ten thousand number code to satisfy the requirement for a new NXX in the Halls Lake Exchange. This new code will be used to provision service to the Edmonds School District who states the code is needed to assist the District in properly implementing an E9-1-1 plan throughout the District. See Attachment A for a copy of the customer's letter requesting the code.

On or about March 11, 2005 Verizon submitted an application to the PA for one full code (10,000 telephone numbers) in the 425 area. See Attachment B for a copy of this application. Verizon completed the application in accordance with the Thousands –Block Number (NXX-X) Pooling Administration Guidelines and the necessary Months to Exhaust Certification.

On or about March 11, 2005 the PA, via the Pooling Administration System (PAS), denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria set forth in the Thousands-Block Number (NXX-X) Pooling Administration Guidelines. The month-to-exhaust is 571.97. The PA will only accept six (6) months or less to exhaust without a waiver request from the Commission. Also, the utilization level is 73.3% which does not meet the minimum criteria of 75%. See Attachment C for a copy of NANPA's Part 3 rejection.

The Washington Commission has the authority to review the PA's decision and reverse them when appropriate.

Ms. Carole J. Washburn

April 6, 2005

Page 2

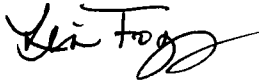
Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision violated the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need, and the PA's denial of numbering resources interferes with Verizon's ability to serve this customer. The PA has stated in their denial notice that the state commission must provide a waiver request for the months to exhaust criteria.

Verizon requests that the Commission instruct the PA to release the numbering resources necessary to meet the needs of Verizon's customer.

Verizon requests approval of this request with an effective date of May 6, 2005. The Commission's waiver request must be submitted with the company's reapplication to PA for the numbering resources needed for deployment of service to customers. In order to avoid further delay in obtaining the required numbers from the PA, the company will need to reapply as soon as possible.

Please call me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lin Fogg", with a stylized flourish at the end.

Lin Fogg  
Public Affairs, Policy and Communications

Attachments

Attachment A



**EDMONDS SCHOOL DISTRICT**  
TECHNOLOGY DEPARTMENT  
20420 68th Ave. W., Lynnwood, WA 98036-7406

Cynthia E. Nelson  
Technology Director

Includes Brier, Edmonds, Lynnwood, Moundaki Terrace, and Woodway

RECEIVED  
EDMONDS SCHOOL DISTRICT  
03 APR -6 PM 10:21  
CYNTHIA E NELSON  
TECHNOLOGY DIRECTOR

To: Washington State Commission  
c/o Amanda Breck  
Verizon Corporate Account Manager  
425-261-7833 phone  
425-261-7947 fax  
amanda.breck@verizon.com

Edmonds School District is seeking a block of 10,000 sequential numbers from Verizon Northwest Inc. in Edmonds, Washington.

The District's business plan is to create a safe working and learning environment that meets state and federal requirements for E-911 service. In order to properly implement an E-911 plan throughout the District, we require a block of 10,000 DID numbers.

Based on the numbering scheme 123-456-7890, the District can not have a 0, 8, or 9 as the 8th ~~digit~~ digit.

Please grant us this ability through your approval to assign a new block of numbers to Verizon's Central Office in Edmonds, Washington.

Thank You,

Donovan Bray  
Edmonds School District  
Network Supervisor  
(425) 670-7107  
brayd@edmonds.wednet.edu

*Attachment B*



robert.f.comer.jr@verizon.com (SPA)

Time : 03/02/2005

- Request For Resources
  - New NPA Part 1
  - New CIC Part A
  - New CIC Part C
  - New 900 Part A
  - New 900 Part C
  - New PCS Part A
  - New PCS Part C
  - New 555 Part 1
  - New 555 Part 3
  - New 456 Part A
  - New 456 Part C
  - New 800-855
- Request For NRUF
- Part1/MTE
  - New
  - Suspended
  - Assign Reservation
  - Change
  - Return
- Reclamation
- Search Forms
- View Documents
- CO Code Reports
- NRUF Reports
- User Profile

### Validation Error

You must correct the following error(s) before proceeding:

- Utilization is invalid.

Effective June 11, 2001

#### CO Code Assignment

MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level  
 (Worksheet to be used for Requests for Additional Codes for Growth)

Date: 03/02/2005  
 Company name: VERIZON NORTHWEST INC.-WA  
 Rate Center: HALLS LAKE  
 NPA(s)-NXXs included in growth calculation (count)<sup>2,\*</sup>: 21  
 Code Applicant: robert f comer  
 Title: specialist  
 Phone: 410-736-6797  
 Fax: 410-736-6647

Telephone numbers (TNs) available for assignment<sup>3,\*</sup>: 36034

	1	2	3	4	5	6	7	8	9
Previous 6-months growth history <sup>4,*</sup>	65	-93	581	-688	-622	-978			
Forecast Next months 1-12 <sup>5,*</sup>	63	63	63	63	63	63	63	63	63

Average Monthly forecast (Calculated) 63.00  
 Months to Exhaust<sup>6</sup> (Calculated) 571.97  
 Utilization level<sup>7,\*</sup> 73.3 %

#### Explanation:

npa-nxx's included in growth calculation:  
 425-216, 425-244, 425-640, 425-670, 425-672, 425-673, 425-697, 425-741, 425-742, 425-743, 425-744, 425-745, 425-771, 425-772, 425-774, 425-776, 425-778, 425-787, 425-918

MTE TN Level

Attachment B

Page 2 of 2

**Submit**

**Calculate**

**Cancel**

**Res**

- <sup>1</sup>A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it r
- <sup>2</sup>Report on all resources for the requested geographic area, including newly acquired codes.
- <sup>3</sup>Forecasted thousands-block(s) needed in each following month, starting with the most recent month a
- <sup>4</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most c  
Month #6 as the current month.
- <sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
- <sup>6</sup>To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or eo  
section 52.15 (g) (3) (iii).
- <sup>7</sup>Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104,


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Part 1 Submitted Successfully

Page 1 of 1

Attachment B


Logout

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robert.f.comer.jr@verizon.com (SPA)
Time : 03/02/2005 09:31 AM

- Request For Resources
  - New NPA Part 1
  - New CIC Part A
  - New CIC Part C
  - New 900 Part A
  - New 900 Part C
  - New PCS Part A
  - New PCS Part C
  - New 555 Part 1
  - New 555 Part 3
  - New 456 Part A
  - New 456 Part C
  - New 800-855
- Request For NRUF
- Part1/MTE
  - New
  - Suspended
  - Assign Reservation
  - Change
  - Return
- Reclamation
- Search Forms
- View Documents
- CO Code Reports
- NRUF Reports
- User Profile


Successfully submitted Part One.  
Please note the tracking number: 425-222523

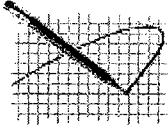
The following supporting documentation is required.

- State or Federal Waivers if applicable.
- Expedite Effective Date documentation if applicable.

Done
View Part One
View Mte

---

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Last updated: March 2, 2005.



ROBERT F. COMER  
 JR/EMPL/MD/Bell-Atl  
 Sent by: Robert F. Comer Jr  
 03/22/2005 06:38 AM

To: Lin A. Fogg/EMPL/WA/Verizon@VZNotes  
 cc: Nicole C. Battist/EMPL/TX/Verizon@VZNotes  
 bcc:  
 Subject: Pooling Administration System Part Three Form for your request

Lin,

According to Kevin Gatchell @ NeuStar, this will be all we'll get from him in the future, there will not be a cut and dried "rejection for mte." When you do your waiver work with the WPUC and a state waiver has been obtained, let me know and I will resubmit.

Thank you,  
 Bob  
 410-736-6797

----- Forwarded by Robert F. Comer Jr/EMPL/MD/Verizon on 03/22/2005 09:28 AM -----



kevin.gatchell@neustar.biz on 03/11/2005 11:37:46 AM

Please respond to poolingsupport@neustar.biz

To: Robert F. Comer Jr/EMPL/MD/Verizon@VZNotes  
 cc: PA\_Part3@neustar.biz  
 Subject: Pooling Administration System Part Three Form for your request

# [IMAGE] Pooling Administration System

Dated 11 March 2005

Attachment C

## Pooling Administrator's Response/Confirmation Part 3

Tracking Number	425-HALLS LAKE-WA-104293		
Date of Application	03/11/2005	Block Effective Date	
Date of Receipt	03/11/2005	Date of Response	03/11/2005
Service Provider Name	Verizon		
(Telcordia™ LERG™ Routing Guide) OCN	4324-VERIZON NW-WA		
NPAC SOA SPID			

Pooling Administrator Contact Information :

Name Kevin Gatchell  
Phone 9253638742 Fax 9253637692  
E-Mail kevin.gatchell@neustar.biz

---

Response

— NPA-NXX-X 0-0-0 Block Assigned  
Block  
Disconnected  
Block Contaminated null  
(Yes or No)  
Block Allocation Date  
Switch Identification null  
(Switching Entity /  
POI)  
Rate Center HALLS LAKE  
Rate Center Sub Zone

X **Form Complete, block requested denied**

Explanation :

DR-3: No documentation to support the State Waiver request was received.  
Please resubmit your request with documentation supporting the State Waiver.  
If you are in disagreement with the disposition of this request, please refer to the  
Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the  
appeals process.

— **Assignment activity suspended by the administrator**

Explanation :

Further Action :

Remarks :

---



Attachment C

Pooling Administrator  
Kevin Gatchell  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 9253638742  
Fax: 9253637692