



Sharon Mullin
Director - Regulatory Affairs

2003 Point Bluff
Austin, TX 78746
T: 512-330-1698
F: 832-213-0203
sharon.mullin@att.com

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

Received
Records Management
03/19/2020 08:03
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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).

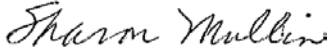
TCAL respectfully requests that the Commission approve this request for a waiver of months to exhaust and rate center utilization requirements, and direct PA/Somos to open a new code and assign 5 – thousands blocks to TCAL to accommodate a specific customer request.

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

