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Mark S. Reynolds
Senior Director – Regulatory
Public Policy



August 23, 2006

Re: Bellevue Rate Center Numbering Waiver

Ms. Carole Washburn,
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
Olympia, Washington 98504

Dear Ms. Washburn:

By this letter Qwest is requesting a waiver of the utilization threshold 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 PA/NeuStar, the Number Pooling Administrator, to assign a thousand block of telephone numbers to a Qwest customer.

The request is for 1,000 telephone numbers in the 425 NPA, specifically a 5 block (425-NXX-5XXX) in the Bellevue Rate Center to meet a specific customer need in the community. According to the PA's existing inventory pool, a new NXX will need to be opened by NeuStar. If a new NXX is granted, Qwest would retain the 5 block for this customer and return the remaining nine blocks.

In order to satisfy the customer request, Qwest submitted a request to PA/NeuStar on August 14, 2006. In order for the request to be approved, Qwest will require a waiver of the current usage threshold for new numbering requests. The original customer request has been provided with this letter as a confidential attachment. These numbers are for growth, with a small number to be used for an E911 system. The customer recently upgraded the PS ALI (911 system) and used all their reserve TNs. This block would allow them to finish the upgrade and provide additional numbers for their normal growth and expansion.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request for a large 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, paras. 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 Paras. 61,66)

Qwest respectfully requests that the Commission approve the request for a waiver of utilization threshold requirements and direct PA/NeuStar to provide Qwest with a 5 block (425-NXX-5XXX).

The directive can be mailed or faxed directly to:

Kevin Gatchell
PA Code Administrator
NeuStar, Inc.
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: kevin.gatchell@neustar.com

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact me at 801-237-7634. I would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,

Attachments