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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

March 29, 2007

Re: Renton 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 four thousands blocks for a Qwest customer expanding their operations and in immediate need of more numbers.

Specifically, this request is for 4,000 sequential telephone numbers in the 425 NPA, Renton Rate Center. The customer's numbering plan requires that the number come from one of the following ranges: NX2-0000 thru 9999, NX4-0000 thru 3999, NX4-4000 thru 8999 or NX5-0000 thru 9999. Our customer has specifically requested numbers that fit with their internal dialing plan. Within a year after installing these new numbers, the customer plans to return 1,400 currently utilized numbers to the pool. The original customer request has been provided with this letter as Confidential Attachment A.

In our effort to satisfy the customer's request, Qwest submitted a request to PA/NeuStar on March 1, 2007 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B & C respectively. In order for the request to be approved, Qwest will require a waiver of the current usage threshold for new numbering requests.

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 months to exhaust threshold requirements, and direct PA/NeuStar to provide Qwest with four thousands blocks from on of the previously mentioned ranges in the Renton Rate Center.

All directives can be emailed, faxed or mailed 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 contact Michael Dalebout at (801) 237-7634 or michael.dalebout@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,

Attachments