



**Qwest Corporation**  
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Olympia, Washington 98501  
(360) 754-3241  
email: [Holly.Dean@qwest.com](mailto:Holly.Dean@qwest.com)

**Holly Dean**  
Manager – Regulatory  
Public Policy

February 16, 2005

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

Attention: Rebecca Beaton  
RE: Request for Additional Numbering Resources

Dear Ms. Washburn:

Qwest respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Qwest's Moses Lake and Centralia rate centers.

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) block of numbers in the 509 area code, Moses Lake rate center and one (1) block of numbers in the 360 area code, Centralia rate center. This request is for numbers in the Moses Lake rate center, from the same prefix (NXX), specifically the 9XXX block, and for numbers in the Centralia rate center, from the same NXX, also specifically the 9XXX block.

Qwest's inventory of telephone numbers available for assignment in the Moses Lake and Centralia switches can not meet the special request of a customer operating in both of these rate centers. Qwest submitted requests to NeuStar for additional numbering resources in the above referenced rate centers. However, the requests were denied as Qwest did not meet the months to exhaust threshold.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as a specific customer request. *FCC Docket No. 99-200, Order No. 00-429, ¶186, released December 29, 2000.* The FCC then delegated authority to the State Commissions to grant requests for additional numbering resources in its Third Report and Order on Numbering Resource Optimization:

RECEIVED  
RECORDS & COMM. DIV.  
05 FEB 16 AM 11:17  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMM. DIVISION

. . . and we delegate authority to state commissions to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denies a specific request for numbering resources [footnote omitted]. . . . We also clarify that states may grant requests by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.

*FCC Docket No. 99-200, Order No. 01-362, ¶¶61 and 64, released December 28, 2001.*

The FCC further stated that companies applying for a waiver of the utilization threshold must provide the Commission with the customer request and current proof of utilization in the rate center. (Customer request and proof of utilization are attached.)

Qwest respectfully requests that the Washington Utilities and Transportation Commission direct NeuStar/NANPA to provide one (1) block of numbers to Qwest, in the 509 area code, from the same NXX, specifically the 9XXX block in the Moses Lake rate center and, one (1) block of numbers in the 360 area code, from the same NXX, specifically the 9XXX block in the Centralia rate center.

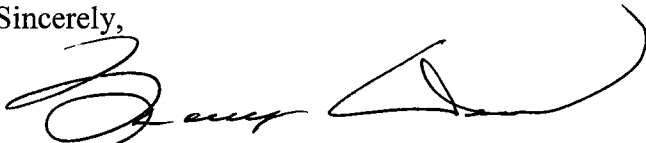
The directive should be mailed to:

Mr. Kevin Gatchell  
NeuStar, Inc.  
kevin.gatchell@neustar.biz  
1800 Sutter Street, Suite 780  
Concord, California 94520  
Telephone: (925) 363-8742

Some of the information provided is considered CONFIDENTIAL by Qwest and is marked as such in accordance with WAC 480-07-160.

Thank you for your immediate consideration in this matter. Please call me on (360) 754-3241 if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Dean", written over a horizontal line.

Holly Dean

Attachments

# Pooling Administration System

home bruce.bennett@qwest.com (SP)

Sign Out

Part 1A

Redacted Version

Type of Application : New

## 1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

### Block Applicant :

Company Name **QWEST CORPORATION**  
Headquarters Address: **1801 California St**  
City: **Denver**  
State: **CO**  
Zip: **80202**

Contact Name **Mr Bruce R Bennett**  
Contact Address **700 W. Mineral Ave, MND20-12**  
City **Littleton**  
Zip **80120**  
Telephone **(303) 707-7008**  
E-mail **bruce.bennett@qwest.com**

State **CO**

Fax **(303) 707-9577**

### Pooling Administrator :

Contact Name **Mr Kevin Gatchell**  
Contact Address **1800 Sutter St. Ste. 780**  
City **Concord**  
Zip **94520**  
Telephone **9253638742**  
E-mail **kevin.gatchell@neustar.biz**

State **CA**

Fax **9253637692**

## 1.2 General Information

LRN Needed No

NPA **509**

LATA \* **676**

OCN **9638-QWEST CORPORATION**

Parent Company OCN \* **9600**

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) \* **[REDACTED]**

City or Wire Center Name **Mose Lake**

Rate Center **MOSES LAKE**

Rate Center Sub Zone **[REDACTED]**

## 1.3 Dates

Date of Application **Monday, February 14, 2005**


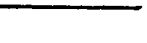
Requested Block Effective Date **17 Mar 2005**

Request Expedited Treatment  Yes  No

**1.4 Type of Service Provider Requesting the Thousands-Block**

a) Type of Service Provider \*

b) Primary type of service Blocks to be used for \*

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p>		<p>&gt;&gt;&gt;</p>	<p>Delete</p>
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>		<p>&gt;&gt;&gt;</p>	<p>Delete</p>

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

**1.5 Type of Request**

- Initial block for rate center  Yes
- Growth block for rate center  Yes
- Change block N/A
- Disconnect block N/A

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

# Pooling Administration System

🏠 [bruce.bennett@qwest.com](mailto:bruce.bennett@qwest.com) (SP)

Sign Out

## Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Monday, February 14, 2005**

OCN **9638**

Company Name **QWEST CORPORATION**

Rate Center **MOSES LAKE**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X  
(s)

509-762, 509-764, 509-765, 509-766, 509-898, 509-793-1 509-793-2 509-793-7

Name of Block Applicant **Mr Bruce R Bennett**

Title **Regulatory Manager**

Telephone Number **(303) 707-7008**

Fax Number **(303) 707-9577**

E-Mail **bruce.bennett@qwest.com**

A. Available Numbers \*

B. Assigned Numbers \*

C. Total Numbering Resources \*

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \*

List excluded Code(s) or Block(s)

**E. Growth History - Previous 6 months<sup>2</sup> \***

Month 1	<input type="text" value=""/>	Month 2	<input type="text" value=""/>
Month 3	<input type="text" value=""/>	Month 4	<input type="text" value=""/>
Month 5	<input type="text" value=""/>	Month 6	<input type="text" value=""/>

**F. Forecast - Next 12 months<sup>3</sup> \***

Month 1	<input type="text" value=""/>	Month 2	<input type="text" value=""/>
Month 3	<input type="text" value=""/>	Month 4	<input type="text" value=""/>

Month 5	[REDACTED]	Month 6	[REDACTED]
Month 7	[REDACTED]	Month 8	[REDACTED]
Month 9	[REDACTED]	Month 10	[REDACTED]
Month 11	[REDACTED]	Month 12	[REDACTED]

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above ) divided by 6) [REDACTED]

H. Months to Exhaust <sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested

A. Available Numbers

H. Months to Exhaust

1

[REDACTED]

[REDACTED]

I. Utilization <sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100

[REDACTED]

Explanation

Specific customer request. ▲  
▼


1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
2. Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Show Calculations

Continue

Cancel

# Pooling Administration System

 [bruce.bennett@qwest.com](#) (SP)

[Sign Out](#)

## Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **70.223 percent**, while your State requires a utilization of **75.000 percent**.

### Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option





# Pooling Administration System

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Sign Out

## Part 1A

Type of Application : New

### 1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

#### Block Applicant

Company Name **QWEST CORPORATION**  
 Headquarters Address: **1801 California St**  
 City: **Denver**  
 State: **CO**  
 Zip: **80202**

Contact Name **Mr Bruce R Bennett**  
 Contact Address **700 W. Mineral Ave, MND20-12**  
 City **Littleton**  
 Zip **80120**  
 Telephone **(303) 707-7008**  
 E-mail **bruce.bennett@qwest.com**

State **CO**  
 Fax **(303) 707-9577**

#### Pooling Administrator :

Contact Name **Mr Kevin Gatchell**  
 Contact Address **1800 Sutter St. Ste. 780**  
 City **Concord**  
 Zip **94520**  
 Telephone **9253638742**  
 E-mail **kevin.gatchell@neustar.biz**

State **CA**  
 Fax **9253637692**

### 1.2 General Information

LRN Needed No

NPA **360**

LATA **674**

OCN **9638-QWEST CORPORATION**

Parent Company OCN \* **9600**

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) \* **[REDACTED]**

City or Wire Center Name **Centralia**

Rate Center **CENTRALIA**

Rate Center Sub Zone

### 1.3 Dates

Date of Application **Monday, February 14, 2005**

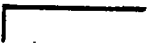

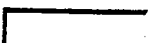

Requested Block Effective Date **17 Mar 2005**

Request Expedited Treatment  Yes  No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider \* Incumbent Local Exchange Carrier (ILEC)

b) Primary type of service Blocks to be used for \* Wireline

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p>			<p>Delete</p>
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			<p>Delete</p>

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request

Initial block for rate center  Yes

Growth block for rate center  Yes

Change block N/A

Disconnect block N/A

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

Continue | Cancel

# Pooling Administration System

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## Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Monday, February 14, 2005

OCN 9638

Company Name QWEST CORPORATION

Rate Center CENTRALIA

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X (s)

360-736, 360-807-0, 360-807-1, 360-807-2, 360-807-6, 360-807-7, 360-807-8, 360-807-9, 360-330-0, 360-330-1, 360-330-2, 360-330-3, 360-330-5, 360-330-6, 360-330-7, 360-330-8, 360-330-9

Name of Block Applicant Mr Bruce R Bennett

Title Regulatory Manager

Telephone Number (303) 707-7008

Fax Number (303) 707-9577

E-Mail bruce.bennett@qwest.com

A. Available Numbers \* [REDACTED]

B. Assigned Numbers \* [REDACTED]

C. Total Numbering Resources \* [REDACTED]

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \* 0

List excluded Code(s) or Block(s)

[Empty box for listing excluded codes or blocks]

### E. Growth History - Previous 6 months<sup>2</sup>

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

### F. Forecast - Next 12 months<sup>3</sup>

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]

Month 5	[REDACTED]	Month 6	[REDACTED]
Month 7	[REDACTED]	Month 8	[REDACTED]
Month 9	[REDACTED]	Month 10	[REDACTED]
Month 11	[REDACTED]	Month 12	[REDACTED]

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above ) divided by 6) [REDACTED]

H. Months to Exhaust <sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested  
1

A. Available Numbers  
[REDACTED]

H. Months to Exhaust  
[REDACTED]

I. Utilization<sup>5</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
[REDACTED]

Explanation

Specific customer request [REDACTED]

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
2. Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Show Calculations

Continue

Cancel

## Pooling Administration System

 [bruce.bennett@qwest.com](mailto:bruce.bennett@qwest.com) (SP)

[Sign Out](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

#### Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option