# **CENTURYLINK**

# 1600 7th Avenue, Room 1506

# Seattle, Washington 98191

# (206) 345-1568

# Facsimile (206) 343-4040

# Mark S. Reynolds

# Director, Western Region

#  Regulatory Affairs

September 27, 2011

Via email and

Overnight Mail

Mr. David Danner

Secretary and Executive Director

Washington Utilities and

 Transportation Commission

1300 S. Evergreen Park Dr. S.W.

P.O. Box 47250

Olympia, Washington 98504-7250

Re: Spokane Rate Center Numbering Waiver

Dear Mr. Danner:

By this letter Qwest Corporation d/b/a CenturyLink (“CenturyLink”) is requesting a waiver of the utilization 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 open and assign a new NXX that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 1,000 DID numbers, some of which are to be used for E911 PSALI purposes, and some to be used for growth needs. A new NXX will be required for this request. There are no blocks in PA Pool Inventory with an NXX in the format of 509-7XX-XXXX. This specific format is requested to fit within the customer’s existing internal dialing plan. The original customer request has been provided with this letter as Confidential Attachment A.

The 509 NPA is forecasted to exhaust in the third quarter of 2020. There are 141 unassigned NXXs in the 509 NPA and 16 blocks available in the PA pool inventory for the Spokane Rate Center.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/NeuStar on September 23, 2011 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B. In order for the request to be approved, CenturyLink 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, ¶¶ 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 ¶¶ 61, 66).

CenturyLink respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/NeuStar to open a new NXX in the 509 NPA Spokane Rate Center to accommodate our customer’s request.

All directives can be emailed, faxed or mailed directly to:

Kevin Gatchell

PA Code Administrator

NeuStar, Inc.

1800 Sutter Street

Concord, CA 94520

Phone 925-363-8742

Fax: 925-363-7692

Email: Kevin, Gatchell@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact Bruce Bennett at (303) 707-7013 or bruce.bennett@centurylink.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Mark Reynolds

MSR:mep

Enclosures