

**CENTURYLINK**  
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Paralegal

December 4, 2015

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Re: Port Ludlow Rate Center Numbering Waiver Request

Dear Mr. King:

By this letter Qwest Corporation d/b/a CenturyLink QC (“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 a code and assign 1 block of numbers that meet the specific needs of a customer. The customer specific information is provided in Confidential Attachments A and B pursuant to WAC-480-07-160. These documents are confidential due to propriety network information.

The 360 NPA is forecasted to exhaust in the first quarter of 2019. There are 27 unassigned NXXs in the 360 NPA and 3 Blocks available in the PA pool inventory for the Port Ludlow Rate Center.

In our effort to satisfy this request, CenturyLink submitted a request to PA/Neustar on November 25, 2015 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment A pursuant to WAC 480-07-160. 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 or to establish an LRN. The waiver process is specifically addressed in the FCC Third Report and Order (“Order”) as the “safety valve”

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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 assign one Block from a new Code in the 360 NPA Port Ludlow Rate Center to accommodate the customer's request to establish an LRN.

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](mailto:Gatchell@neustar.biz)

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact Rita Schmitz at (608) 796-5600 or [rita.schmitz@centurylink.com](mailto:rita.schmitz@centurylink.com). We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,

Maura Reynolds