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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

May 19, 2010

Mr. David Danner,
Executive Director & Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, Washington 98504

Re: Spokane Rate Center Numbering Waiver, E-File ID 4385

Dear Mr. Danner:

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 open and assign a new NXX that meets the needs of a specific Qwest customer.

The customer request is for 1,500 sequential telephone numbers in the 509 NPA, Spokane Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and that the numbers be in a 509 NX8-2000-3499 block range due to their existing internal dialing plan. The customer intends to start deploying these numbers in July 2010 with their new communications system. The new numbers are needed for deployment of VoIP, campus building expansions and growth. Qwest asks that the WUTC authorize NeuStar to open a new NXX and assign 2 blocks that would meet the customer's needs from the 509 NPA Spokane Rate Center. Qwest also asks that the WUTC authorize Neustar to reserve the remaining 8 blocks for future expansion at the customer's location. The reservation on these 8 blocks will remain in effect at the direction of the WUTC. Upon the customer's request for any additional blocks, a new Safety Valve Waiver request will not be required, but Qwest will notify the WUTC of the block(s) assignment. The 509 NPA is forecasted to exhaust in the fourth quarter of 2016. There are 143 unassigned NXXs in the 509 NPA, and 34 blocks available in the PA pool inventory for the Spokane Rate Center.

The customer will not have any telephone numbers to return since the new numbers in this request are for deployment of VoIP. 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 May 7, 2010 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, 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 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 St
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 Kevin D. Manwarren at (303) 383-6550 or kevin.manwarren@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,



Attachments