

**CENTURYLINK**  
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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

Mr. David Danner  
September 27, 2011  
Page 2

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](mailto: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](mailto:bruce.bennett@centurylink.com). We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Mark Reynolds

MSR:mep  
Enclosures