

**CENTURYLINK**  
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Mark S. Reynolds  
Director, Western Region  
Regulatory Affairs

January 25, 2012

Via email

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: REVISED Des Moines 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 thousands block that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 500 DIDs to be used for E911 purposes in the same NXX as the customer’s internal dialing plan. The numbers are required to support growth on campus for new class rooms and administrative offices. There will be no returns of existing TNs. The original customer request has been provided with this letter as Confidential Attachment A.

The 206 NPA is forecasted to exhaust in the first quarter of 2025. There are 199 unassigned NXXs in the 206 NPA and 18 blocks available in the PA pool inventory for the Des Moines Rate Center in the format of 206-592-5000 through 206-592-5499.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/NeuStar on January 19, 2012 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.

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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 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