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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

)	
IN THE MATTER OF THE INVESTIGATION)	Docket No. UT-991627
INTO THE ISSUE OF NUMBERING)	
RESOURCES)	AMENDMENT TO PETITION FOR
)	RECONSIDERATION, OR, IN THE
)	ALTERNATIVE, WAIVER
_____)	

On December 1, 2000, the Washington Utilities and Transportation Commission (Commission) issued an Order Requiring Number Pooling Trial in Area Code 509. The Commission ordered all telecommunications companies with prefixes in rate centers serving the Spokane metropolitan statistical area (MSA) and with switches capable of local number portability to implement a thousand-number block pooling trial by July 8, 2001.

On January 22, 2001 Qwest filed with the Commission a Petition for Reconsideration, or, in the Alternative, Waiver regarding the mandatory number pooling trial. The Commission has not yet acted on this Petition. Qwest hereby amends its Petition to provide updated information.

After Qwest filed its waiver request, the Commission established a comment cycle. In Qwest's March 14, 2001 reply comments, Qwest indicated that it would supplement the record with better information about the costs of implementing thousand block number pooling, and update its estimated costs as appropriate.

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Since that time, Qwest has met with the Commission Staff to further refine its cost estimates. As part of those discussions, Qwest has revised its approach for the allocation of common costs across participating number pooling trial states. Qwest's original petition included an Attachment B. This Attachment B has been revised to reflect those discussions and is attached hereto.

In addition, at pages 5 and 7 of its March 14 reply comments, Qwest stated it had 24,000 numbers to donate to the Spokane MSA trial. Specifically, Qwest has only 24,000 numbers to donate within the Spokane rate center. Numbers donated to the pooling trial are technically limited to use within the rate center from which they were donated. Therefore, the quantity of telephone numbers donated within the Spokane rate center is the most relevant figure since that is the rate center driving the 509 NPA exhaust. In total, Qwest has identified 44,000 telephone numbers to donate to the Spokane MSA trial, 24,000 of which are in the Spokane rate center.¹

Qwest's donation of 44,000 telephone numbers to the pool remains small compared to that of other providers, who may contribute 700,000 telephone numbers. The majority of these numbers will be within the Spokane rate center. Thus, it remains clear that the cost does not support the limited benefit of Qwest's participation in the trial. Qwest continues to respectfully request its waiver be granted.

Finally, Qwest would like to update its petition to reflect that on April 4, 2001, NANPA updated the projected life of the 509 NPA until the second quarter of 2003. This modification is consistent with current industry code utilization. Additionally, because the 509 NPA now has a

¹ It has been suggested that Qwest consolidate its rate centers in the Spokane MSA into a single rate center as a possible alternative to participation in the pooling trial. This is really not an option to participation in the pooling trial as it would require implementation of number pooling hardware and software in order for Qwest to utilize numbers between its rate centers. This approach actually increases the overall cost and produces revenue reductions as a result of such a consolidation.

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projected life of two years, the Commission could reasonably delay all provider participation in the trial until some future date.

Respectfully submitted this 26th day of April, 2001.

Qwest Corporation

By: _____
Lisa A. Anderl, WSBA #13236