

CENTURYLINK
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Mark S. Reynolds
Director, Western Region
Regulatory Affairs

October 21, 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: Safety Valve Waiver Request

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 assign two thousands blocks from the PA Pool Inventory that meet the needs of a specific CenturyLink customer.

Specifically, the customer has requested 1,800 sequential TNs in the format of 206-NXX-3XXX through 4XXX, to be assigned directly to new class rooms and administrative offices. The numbers will be assigned in the PSALI database for E911 purposes. This specific format is requested to fit within the customer’s existing internal dialing plan. 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 203 unassigned NXXs in the 206 NPA and 20 blocks available in the PA pool inventory for the Des Moines Rate Center. The Des Moines Rate Center serves both the 206 and 253 Area Codes from two different Central Office switches. Our customer has a service address that requires service from the switch that serves the 206 Area Code.

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In our effort to satisfy the customer's request, CenturyLink submitted a request to PA/NeuStar on October 19, 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 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 assign two new thousands blocks from the PA Pool Inventory in the 206 NPA Des Moines Rate Center to accommodate our customer's request. Currently, there are 2 blocks in the Pool that were previously donated by CenturyLink, which we will request upon Commission approval.

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

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. We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Mark Reynolds

MSR:mep
Enclosures