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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Qwest Corporation
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Olympia, Washington 98501
(360) 754-3241
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Holly Dean
Manager – Regulatory
Policy & Law

September 12, 2003

Ms. Carole Washburn,
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Attention: Dave Dittmore
RE: Request for Additional Numbering Resources

Dear Ms. Washburn:

Qwest Corporation (Qwest) respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Qwest's Sumner rate center.

Qwest is requesting from NeuStar/NANPA, the Washington number pooling administrator, one (1) block of numbers in the 253 area code to meet future needs of customers in the Sumner rate center. The Sumner rate center has two switches, Sumner and Bonney Lake. Qwest's inventory of numbers available for assignment has declined to less than 50% in the Bonney Lake switch to the point that additional numbering resources is required. The Sumner switch does not have any blocks that can be moved to Bonney Lake.

Qwest submitted a request to NeuStar for additional numbering resources in the above referenced rate center. However, this request was denied as Qwest did not meet the months to exhaust threshold. Qwest will not exhaust its existing numbering resources for an additional 19.6 months in the Sumner rate center.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as a specific customer request. *FCC Docket No. 99-200, Order No. 00-429, ¶186, released December 29, 2000.* The FCC then delegated authority to the State Commissions to grant requests for additional numbering resources in its Third Report and Order on Numbering Resource Optimization:

. . . and we delegate authority to state commissions to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denies a specific request for numbering resources [footnote omitted]. . . We also clarify that states may grant requests by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.

FCC Docket No. 99-200, Order No. 01-362, ¶¶61 and 64, released December 28, 2001.

The FCC further stated that companies applying for a waiver of the utilization threshold must provide the Commission with the customer request and current proof of utilization in the rate center. (Proof of utilization attached.)

Qwest respectfully requests that the Washington Utilities and Transportation Commission direct NeuStar/NANPA to provide a one (1) block of numbers to Qwest in the 253 area code, Sumner rate center.

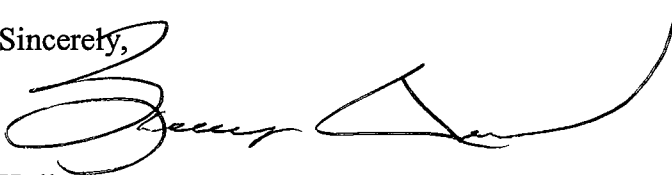
The directive should be mailed to:

Mr. Kevin Gatchell
NeuStar, Inc.
kevin.gatchell@neustar.com
1800 Sutter Street, Suite 780
Concord, California 94520
Fax: (925) 363-7692

Some of the information provided is considered CONFIDENTIAL by Qwest and is stamped as such in accordance with WAC 480-09-015.

Thank you for your consideration in this matter. Please call me on (360) 754-3241 if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Dean", with a long, sweeping flourish extending to the right.

Holly Dean

Attachments