

CENTURYLINK
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Philip E. Grate
State Regulatory Affairs Director

April 17, 2017

Via email

Mr. Steven King
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. King:

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 2500 DID consecutive numbers with the same area code and the same prefix that would meet the customer request. This request is for a new Code to Replenish the Pool. Once our request is approved, we will donate the remaining seven blocks to the industry pool and those will be available for assignment for other service providers. The original customer request has been provided with this letter as Confidential Attachment A pursuant to WAC 480-07-160. The letter contains proprietary customer information.

The 206 NPA is forecasted to exhaust in the first quarter of 2024. There are 129 unassigned NXXs in the 206 NPA and 2 non-consecutive blocks available in the PA pool inventory for the Des Moines Rate Center. The customer will be returning 3200 numbers after March 2018.

In our effort to satisfy the customer's request, CenturyLink submitted a request to PA/NeuStar on April 17, 2017 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B pursuant to WAC 480-07-160. The

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application contains proprietary customer information. 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 open a new NXX in the 206 NPA Des Moines 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

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact Rita Schmitz at (608) 796-5600 or rita.schmitz@centurylink.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Philip E. Grate

Enclosures