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Mark S. Reynolds
Vice President of Public Policy
NW Region

July 31, 2015

Via email

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Seattle Rate Center Numbering Waiver

Dear Mr. King:

By this letter Qwest Corporation d/b/a CenturyLink QC ("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 a new Code for a Dedicated Customer.

Specifically, the customer has requested 10,000 consecutive numbers, in 206-632-. Once the new NXX Code is assigned, the customer will begin transitioning to the new NXX. Customer will be returning between 7609 and 11,300 numbers. This request will consolidate resources into one NXX. The original customer request has been provided with this letter as Confidential Attachment A pursuant to WAC 480-07-160.

The 206 NPA is forecasted to exhaust in the first quarter of 2029. There are 165 unassigned NXXs in the 206 NPA.

In our effort to satisfy the customer's request, CenturyLink submitted a request to PA/Neustar on July 28, 2015 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B pursuant to WAC 480-07-160. 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

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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 10,000 sequential numbers in the 206 NPA Seattle 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,

Mark Reynolds

/MSR