

CENTURYLINK
1600 7th Avenue, Room 1506
Seattle, Washington 98191

PHIL GRATE
State Regulatory Affairs Director
206-345-6224

April 11, 2016

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 Request

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 code and assign 10 block of numbers that meet the specific needs of a customer. The customer specific information is provided in Confidential Attachments A pursuant to WAC-480-07-160. This document is confidential due to propriety network information.

The 206 NPA is forecasted to exhaust in the first quarter of 2029. There are 145 unassigned NXXs in the 206 NPA for the Seattle Rate Center. The customer is requesting 206-XXX – full code, not to begin with “9” and will return 425-679 DIDs when the move is complete. The new numbers will be placed into service in the second and third quarters of 2016.

In our effort to satisfy this request, CenturyLink submitted a request to PA/Neustar on November April 7, 2016 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.

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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 or to establish an LRN. 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 ten Blocks from a new Code in the 206 NPA Seattle Rate Center to accommodate the customer’s request to establish an LRN.

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,

Phil Grate