



Spirit of Service

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Holly Dean
Manager - Regulatory
Public Policy

May 14, 2004

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) additional block of numbers in the 253 area code to meet future needs of customers in the Sumner rate center. In September 2003, Qwest requested and the Commission concurred with the granting of one block of numbers in the Sumner rate center, in the Bonney Lake switch. Qwest's inventory of available numbers for assignment in the Bonney Lake switch has once again declined to the point that additional numbering resources is required.

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.

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:

UT-040912 (nr)
6-9-04

RECEIVED
RECORDS MANAGEMENT
MAY 14 PM 4:44
STATE OF WASH
UTIL. AND TRANSP
COMMISSION

. . . 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. (Customer request and proof of utilization are attached.)

Qwest respectfully requests that the Washington Utilities and Transportation Commission direct NeuStar/NANPA to provide one (1) block of numbers to Qwest in the 253 area code, Summer 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 marked as such in accordance with WAC 480-07-160.

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

Sincerely,



Holly Dean

Attachments

Pooling Administration System

 jbarlo@qwest.com (SP)

Sign Out

Part 1A

Redacted Version

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **QWEST CORPORATION**
 Headquarters Address: 1801 California St
 City: Denver
 State: CO
 Zip: 80202

Contact Name **Mr Jacob Barlow**
 Contact Address **700 W Mineral Ave.**
 City **Littleton**
 Zip **80120**

State CO

Telephone (303) 707-8054

Fax (303) 707-9577

E-mail **jacob.barlow@qwest.com**

Pooling Administrator :

Contact Name **Ms Tara Farquhar**
 Contact Address **1800 Sutter St. Ste. 780**
 City **Concord**
 Zip **94520**
 Telephone **9253637654**
 E-mail **tara.farquhar@neustar.com**

State CA

Fax 9253637695

1.2 General Information

LRN Needed No

LATA * 674

NPA 253

OCN **9638-QWEST**

CORPORATION

Parent Company OCN * 9600

Number of Thousands-Blocks Requested 1

City or Wire Center Name **Bonney Lake**

1.3 Dates

Date of Application **Wednesday, May 12, 2004**
 Requested Block Effective Date **14 Jun 2004**

Rate Center **SUMNER**

Rate Center Sub Zone

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider * Incumbent Local Exchange Carrier (ILEC)

b) Primary type of service Blocks to be used for * Wireline

c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.		<input style="width: 50px; height: 20px;" type="button" value=" >>> "/>	<input style="width: 50px; height: 20px;" type="button" value=" Delete "/>
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any		<input style="width: 50px; height: 20px;" type="button" value=" >>> "/>	<input style="width: 50px; height: 20px;" type="button" value=" Delete "/>

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request

- Initial block for rate center Yes
- Growth block for rate center Yes
- Change block N/A
- Disconnect block N/A

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

Pooling Administration System

igbarlo@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Wednesday, May 12, 2004

OCN 9638

Company Name **QWEST CORPORATION**

Rate Center **SUMNER**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

253-826, 253-862, 253-863, 253-891, 253-447-4

Name of Block Applicant **Mr Jacob Barlow**

Title **Code Administrator**

Telephone Number **(303) 707-8054**

Fax Number **(303) 707-9577**

E-Mail **jacob.barlow@qwest.com**

A. Available Numbers [REDACTED]

B. Assigned Numbers [REDACTED]

C. Total Numbering Resources [REDACTED]

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation
List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months²

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

F. Forecast - Next 12 months³

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]

Month 5		Month 6		
Month 7		Month 8		
Month 9		Month 10		
Month 11		Month 12		

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested

A. Available Numbers

H. Months to Exhaust

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100

Explanation

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
2. Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(iii))

Show Calculations

Continue

Cancel

Pooling Administration System

ajbario@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

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