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Holly Dean Manager – Regulatory Public Policy

July 12, 2004

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

Attention: Dave Dittemore

RE: 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 Vancouver rate center.

Qwest is requesting from NeuStar/NANPA, the Washington number pooling administrator, one (1) block of numbers in the 360 area code to meet the special needs of a customer in the Vancouver rate center. Specifically, Qwest requests the "5 block" from the 487 prefix.

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:

... 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 360 area code, Vancouver 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

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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

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	Part 1A	Redacted Ver	sion _
Type of Application :	New		
1.1 Contact Information :			
Block Applicant :		Note: If any of the contact info is inc	соггесt, edit your user profi
	QWEST CORPORATION		
Headquarters Address:			
	Denver		
State:			
	80202		
	Mr Bruce R Bennett		
	700 W. Mineral Ave, MND20-	12	
•	Littleton		State CO
	80120		
	(303) 707-7008		Fax (303) 707-957
	bruce.bennett@qwest.com		
Pooling Administrator : Contact Name I			
	Ms Tara Farquhar 1800 Sutter St. Ste. 780		
	1800 Sutter St. Ste. 780 Concord		***
	Concord 94520		State CA
	94520 9 25 3637654		Fax 9253637695
	tara.farquhar@neustar.com		F&X 3233001003
1.2 General Information			
LAN Needed I	No		
NPA 3	360	LATA • 672	-
ocn (9638-QWEST CORPORATION	,	
Parent Company OCN *			
Number of Thousands-Blocks Requested			
Switch Identification (Switching Identity/POI)		City or Wire Center Name Vancou	ver
• •	VANCOUVER	Rate Center Sub Zone	
.3 Dates			<u> </u>
Date of Application	Thursday, July 8, 2004	,*.	· · · · · · · · · · · · · · · · · · ·
Requested Block Effective Date 8			
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a) Type of Service Provider * Incumbent Lo b) Primary type of service Blocks to be used for *	ocal Exchange Carrier	r (ILEC)	
c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.		>>>.	Delete
d) Thousands-Block(s) (NPA-NXX-X) that are undestrable for this assignment, if any		>>>	Delete
e) If requesting a code for LRN purposes, indicate which blothe blocks will be given to the pool)	ock(s) you will be keepir	ig (the remainder of	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 NX application has been prepared in accordance with the Thous	X-X block is true and ac sands-Block (NXX-X) Pc	curate to the best of moding Administration (ny knowledge and that this Guidelines INC 99-0127-023
	Continue Cancel]	

P oling Administration Syst

bruce.bennett@gwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Thursday, July 8, 2004 **OCN 9638**

Company Name QWEST CORPORATION

Rate Center VANCOUVER

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

360-212, 360-253, 360-254, 360-256, 360-260, 360-418, 360-449-0, 360-449-1, 360-4 449-3, 360-449-4, 360-449-5, 360-449-6, 360-449-7, 360-449-8, 360-487-1, 360-487-2, 360-487-3, 360-487-4, 360-514, 360-546, 360-566-0, 360-566-1, 360-566-4, 360-566-8, 360-566-9, 360-571, 360-573, 360-574, 360-576, 360-604, 360-619, 360-690, 360-693, 360-694, 360-695, 360-696, 360-699, 360-735, 360-737, 360-750, 360-759, 360-882, 360-883, 360-885, 360-891, 360-892, 360-896, 360-905, 360-906, 360-944, 360-992, 360-993

Name of Block Applicant Mr Bruce R Bennett

Title Regulatory Manager

Telephone Number (303) 707-7008

Fax Number (303) 707-9577

E-Mail bruce.bennett@gwest.com

A. Available Numbere

B. Assigned Numbers'

C. Total Numbering Resources

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

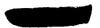
Month 1	Month 2	
Month 3	 -Month 4	
Month 5	Month 6	

F. Forecast - Next 12 months³ *

Month 1	Month 2	
Month 3	Month 4	

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)

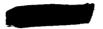


H. Months to Exhaust 4 (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested



A. Available Numbers



H. Months to Exhaust



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



Explanation

Specific customer request for 360-487-5. Customer has existing 360-487-1000-4999.

- 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)(ii))

Show Calculations

Continue Cancel

Foling Administration Sys m

d bruce.bennett@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
- C Discard all the Information provided for the request and start with a fresh Part 1A
- C State Waiver Option

Submit Cancel