



UT-041935 (NR)
11-10-04

Qwest Corporation
512 12th Avenue, Suite 400
Olympia, Washington 98501
(360) 754-3241
email: Holly.Dean@qwest.com

Holly Dean
Manager – Regulatory
Public Policy

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

November 1, 2004

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

Attention: Dave Dittmore
RE: Additional Numbering Resources

Dear Ms. Washburn:

Qwest respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Qwest's Moses Lake rate center.

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) block of numbers in the 509 area code, Moses Lake rate center. Qwest's inventory of telephone numbers available for assignment in the Moses Lake switch can not meet the special needs of a customer in this rate center.

Qwest submitted a request to NeuStar for additional numbering resources in the above referenced rate center. However, the request was denied as Qwest did not meet the months to exhaust threshold. Qwest previously donated the 509-793 2,3,4,5 and 6 blocks to the Pooling Administrator. Qwest requested the assignment of any one of these blocks to meet the needs of a specific customer request.

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 509 area code from the 793-2,3,4,5 or 6 block, in the Moses Lake rate center.

The directive should be mailed to:

Ms. Tara Farquhar
NeuStar, Inc.
tara.farquhar@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 immediate consideration in this matter. Please call me on (360) 754-3241 if you need additional information.

Sincerely,



Holly Dean

Attachments

Pooling Administration System

bruce.bennett@qwest.com (SP)

Redacted Version

Sign On

Part 1A

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 Bruce R Bennett
Contact Address 700 W. Mineral Ave, MND20-12
City Littleton
Zip 80120
Telephone (303) 707-7008
E-mail bruce.bennett@qwest.com

State CO

Fax (303) 707-9577

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

NPA 509

LATA * 676

OCN 9638-QWEST CORPORATION

Parent Company OCN * 9600

Number of Thousands-Blocks Requested 1

Switch Identification (Switching Identity/POI) [REDACTED]

City or Wire Center Name Moses Lake

Rate Center MOSES LAKE

Rate Center Sub Zone

1.3 Dates

Date of Application Thursday, October 28, 2004

Requested Block Effective Date 28 Nov 2004

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider

b) Primary type of service Blocks to be used for

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p>	<input type="text"/>	<input type="text" value=">>>"/>	<p>509-793-2 509-793-3 509-793-4 509-793-5 509-793-6</p> <p><input type="button" value="Delete"/></p>
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>	<input type="text"/>	<input type="text" value=">>>"/>	<p><input type="button" value="Delete"/></p>

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

bruce.bennett@qwest.com (SP)

Sign O

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Thursday, October 28, 2004

OCN 9638

Company Name QWEST CORPORATION

Rate Center MOSES LAKE

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

509-762, 509-764, 509-765, 509-766, 509-793-1, 509-793-7

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@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 * 0

List excluded Code(s) or Block(s)

[REDACTED]

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	[REDACTED]	Month 6	[REDACTED]
Month 7	[REDACTED]	Month 8	[REDACTED]
Month 9	[REDACTED]	Month 10	[REDACTED]
Month 11	[REDACTED]	Month 12	[REDACTED]

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

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

Block Requested
1

A. Available Numbers
[REDACTED]

H. Months to Exhaust
[REDACTED]

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

Explanation

Need 500 sequential TNs for [REDACTED]
Block must begin with 2,3,4,5, or 6 to
accomodate internal dialing plan

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

Pooling Administration System

 bruce.bennett@qwest.com (SP)

Sign Out

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

Your utilization calculates to 70.710 percent, while your State requires a utilization of 75.000 percent.

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