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Holly Dean Manager – Regulatory Public Policy

November 1, 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 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

1.4 Type of Service Provider Requesting the Tho	·		
a) Type of Service Provider Incumbent L	ocal Exchange Carri	ier (ILEC)	
b) Primary type of service Blocks to be used for Wireline	1		
	·	7	509-793-2 509-793-3 509-793-4 509-793-5
c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.		>>>	509-793-6
			· Delete
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any		>>>	
If requesting a code for LRN purposes, indicate which blocks will be given to the goal)	The team		Delete
e blocks will be given to the pool)	ск(s) уоц will be көерігі	.g (the remainder or N	W A
5 Type of Request			
Initial block for rate center C Yes			
Growth block for rate center & Yes			
Change block N/A			
Disconnect block N/A			
ereby certify that the above information requesting an NXX- plication has been prepared in accordance with the Thousa	-X block is true and acc ands-Block (NXX-X) Po	surate to the best of my lolling Administration Gui	knowledge and that this idelines INC 99-0127-023
, Č	Continue Cancel	<u> </u>	

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

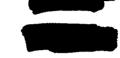
1

A. Available Numbers

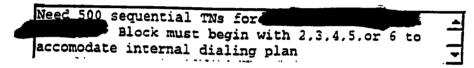
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H. Months to Exhaust

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



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)(ii))

Show Calculations Continue

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

C Return to the Months To Exhaust Form

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- C Discard all the information provided for the request and start with a fresh Part 1A

Submit Cancel