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Holly Dean Manager – Regulatory Public Policy

September 20, 2005

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

Attention: Rebecca Beaton

RE: Request for Additional Numbering Resources

Dear Ms. Washburn:

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

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) block of numbers in the 509 area code, Pasco rate center. This request is specifically for numbers from NXX 542, the 5 block. Qwest's inventory of telephone numbers available for assignment in the Pasco switch can not meet the special request of a customer operating 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.

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

STATE OF WASH.

UTIL. AND TRANSP.

COMMISSION

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 NXX 542, specifically the 5 block, in the Pasco rate center.

The directive should be mailed to:

Mr. Kevin Gatchell NeuStar, Inc. kevin.gatchell@neustar.biz 1800 Sutter Street, Suite 780 Concord, California 94520 Telephone: (925) 363-8742

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

Redacted Version

d bruce.bennett@qwest.com (SP)

Sign Out

Request Resources

State WASHINGTON

NPA 509

Rate Center PASCO

OCN 9638-QWEST CORPORATION

Type of Application Application for Individual Blocks

Quantity of Blocks Requested 1

Continue

Cancel

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

| P | Pooling Adminis | tration System | |
|--|----------------------------------|---|---|
| d bruce.bennett@qwest.com (SP) | | | Sign Ou |
| • | Part 1 | A | |
| Type of Application : | New | manuscript (gr. d.) | |
| 1.1 Contact Information : | | | |
| | 1 | Note: If any of the contact info is incorre | ct, edit your user profile. |
| Block Applicant : | CHICAT AADDAD ATIALI | | |
| | QWEST CORPORATION | | |
| Headquarters Address: | : 1801 California St : Denver | | |
| State: | | | |
| | 80202 | | |
| | Mr Bruce R Bennett | | |
| | 700 W. Mineral Ave, MND |)20-12 | |
| - | Littleton | | State CO |
| ∠ıp | 80120 | · | (200) 707 |
| Telephone | (303) 707-7008 | | _{Fax} (303) 707- 9577 |
| E-mail | bruce.bennett@qwest.co | mc | |
| Pooling Administrator : | | | |
| | Mr Kevin Gatchell | | |
| | 1800 Sutter St. Ste. 780 | | Chain CA |
| • | Concord 94520 | | State CA |
| | | | _{Eav} (925) 363- |
| | (925) 363-8742 | | Fax 7692 |
| E-mail | kevin.gatchell@neustar.l | blz | |
| 1.2 General Information | | | |
| LRN Needed | No | | · · · · · · · · · · · · · · · · · · · |
| NPA | 509 | LATA * 676 | : |
| OCN | 9638-QWEST CORPORATION | • | |
| Parent Company OCN * | 9600 | | |
| Number of Thousands-Blocks Requested | • | | |
| Switch Identification (Switching Identity/POI) | | City or Wire Center Name PASCO | s branche de l'Andrée e l'échelle annue annue de l'annue de l'annue de l'annue de l'annue de l'annue de l'annue |
| Rate Center | PASCO | Rate Center Sub Zone | |
| 1.3 Dates | | | · · · · · · · · · · · · · · · · · · · |
| Date of Application | Monday, September 19 | 2005 | *. *.* **. **. **. **. **** |
| | | , | |

| Requested Block Effective Date 20 Oct 2005 | |
|---|--|
| Request Expedited Treatment (Yes (No | in the second of the second |
| 1.4 Type of Service Provider Requesting the Thousands-B | lock |
| a) Type of Service Provider * Incumbent Local Exchang b) Primary type of service Blocks to be used for * | ge Carrier (ILEC) |
| c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool. | 509-542-5 509-542-6 |
| Click here to see the available blocks in the pool. | Delete |
| d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any | >>> |
| e) If requesting a code for LRN purposes, indicate which block(s) you remainder of the blocks will be given to the pool) | will be keeping (the 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 application has been prepared in accordance with the Thousands-Bloc 023 | is true and accurate to the best of my knowledge and that this ck (NXX-X) Pooling Administration Guidelines INC 99-0127- |
| Continue | Cancel |

Pooling Administration System

fruce.bennett@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Monday, September 19, 2005

OCN 9638

Company Name QWEST CORPORATION

Rate Center PASCO

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

NXX-X(s)

509-543, 509-544, 509-545, 509-547, 509-567, 509-546-9, 509-542-0, 509-542-1, 509-542-2, 509-542-3, 509-542-4, 509-542-8, 509-542-9, 509-546-0, 509-546-2, 509-546-3, 509-546-4, 509-546-5, 509-546-6, 509-546-7, 509-546-8

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

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 | market in the filmings of the state of the s | Month 4 | |
| Month 5 | | Month 6 | 104 |

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 | Contracting to the contracting of the contracting o |
| 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

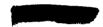
1

A. Available Numbers

H. Months to Exhaust



I. Utilization 5 (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100



Explanation

Specific customer request 80 sequential TNs. No 0,7,8,9 blocks. Prefer 542 NXX. Forecast for mos 1-6 are negative #s, but PAS won't allow entry.



- 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, ý 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

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

- O 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

Submit

Cancel