



UT-051416 (NR)
10-12-05
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION
SEP 21 11:09:12

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

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 Sumner rate center.

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) block of numbers in the 253 area code to meet the future needs of customers in the Sumner rate center. Qwest's inventory of available telephone numbers for assignment in the Bonney Lake switch has again declined to the point that additional numbering resources are required. As there are no available blocks to transfer from the other Qwest switch in the Sumner rate center, a new block of numbers is required in order to provide customers service in Bonney Lake.

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. While the Bonney Lake switch would qualify for additional numbering resources in and of itself, FCC rules require that the rate center qualify for additional numbers before numbers can be assigned by NeuStar to a given switch in the rate center.

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 253 area code, Sumner 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

 [bruce.bennett@qwest.com](#) (SP)

[Sign Out](#)

Request Resources

State WASHINGTON 

NPA 253

Rate Center SUMNER

OCN 9638-QWEST CORPORATION 

Type of Application Application for Individual Blocks

Quantity of Blocks Requested 1

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.

Pooling Administration System

🏠 bruce.bennett@qwest.com (SP)

Sign Out

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**

State **CO**

Telephone **(303) 707-7008**

Fax **(303) 707-9577**

E-mail **bruce.bennett@qwest.com**

Pooling Administrator :

Contact Name **Mr Kevin Gatchell**
Contact Address **1800 Sutter St. Ste. 780**
City **Concord**
Zip **94520**

State **CA**

Telephone **(925) 363-8742**

Fax **(925) 363-7692**

E-mail **kevin.gatchell@neustar.biz**

1.2 General Information

LRN Needed **No**

NPA **253**

LATA * **674**

OCN **9638-QWEST CORPORATION**

Parent Company OCN * **9600**

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) 

City or Wire Center Name **Bonney Lake**

Rate Center **SUMNER**

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

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

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

bruce.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 **SUMNER**

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

253-891, 253-826, 253-862, 253-863, 253-299-5, 253-299-6, 253-447-4

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 * **0**

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
1

A. Available Numbers

H. Months to Exhaust

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

Explanation

SUMNER rate center growth is net negative
Growth for BYLKWA01DS1
Growth. Only numbers left for assignment.

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)

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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