



UT-051438 (NR)
10-26-05

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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 23, 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 Spokane rate center.

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, four (4) block of numbers in the 509 area code. Qwest's inventory of available telephone numbers for assignment in the Spokane switch can not meet the special request of a customer operating in this rate center. This request is specifically for numbers in the 2, 3, 4 and 7 blocks to accommodate customer and "911" Caller ID system requirements. Currently, there are no 7K blocks available for assignment in NeuStar's Pooling Administrator's block inventory. Consequently, the Pooling Administrator will need to open a new NXX to assign the 7K block to Qwest, retaining the remaining 9 blocks. If the Pooling Administrator does not meet the months to exhaust threshold for the new NXX code, authorization will be needed from the Commission to request a new NXX code from NANPA.

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 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 four (4) blocks of numbers to Qwest, in the 509 area code, specifically for numbers in the 2, 3, 4 and 7 blocks in the Spokane rate center. Further, Qwest requests that the Commission authorize NANPA to open a new NXX code allowing the Pooling Administrator to assign a 7K block to Qwest.

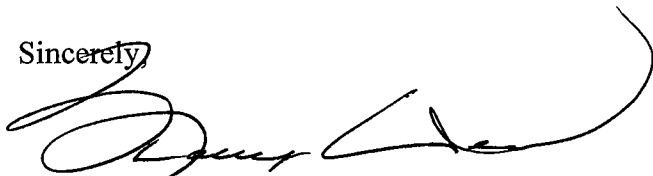
The directive should be mailed to:

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)

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Request Resources

State WASHINGTON 

NPA 509 

Rate Center SPOKANE

OCN 9638-QWEST CORPORATION 

Type of Application Application for Individual Blocks 

Quantity of Blocks Requested 4

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)

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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 **509**

LATA * **676**

OCN **9638-QWEST CORPORATION**

Parent Company OCN * **9600**

Number of Thousands-Blocks Requested **4**

Switch Identification (Switching Identity/POI) **[REDACTED]**

City or Wire Center Name **Riverside**

Rate Center **SPOKANE**

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)

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Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Monday, September 19, 2005**

OCN **9638**

Company Name **QWEST CORPORATION**

Rate Center **SPOKANE**

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

509-323, 509-324, 509-325, 509-326, 509-327, 509-328, 509-353, 509-354, 509-358, 509-363, 509-441, 509-448, 509-455, 509-456, 509-458, 509-459, 509-465, 509-466, 509-467, 509-468, 509-482, 509-483, 509-484, 509-487, 509-489, 509-244, 509-532, 509-533, 509-534, 509-535, 509-536, 509-622, 509-623, 509-624, 509-625, 509-626, 509-744, 509-747, 509-835, 509-838, 509-891, 509-892, 509-921, 509-922, 509-924, 509-926, 509-927, 509-928, 509-893-0, 509-893-1, 509-893-2, 509-893-3, 509-893-4, 509-893-6, 509-893-7, 509-893-8, 509-893-9, 509-227-0, 509-227-1, 509-227-2, 509-227-3, 509-227-4, 509-227-5, 509-227-6, 509-227-7, 509-227-8, 509-228-0, 509-228-4, 509-228-5, 509-228-6, 509-228-9, 509-944-2, 509-944-3, 509-944-7, 509-944-8, 509-944-9, 509-329-1, 509-329-2, 509-

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	

	[REDACTED]		[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	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]

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

Explanation

Specific customer request for 1,896 TNs in 2,3,4,7 blocks. No NXXs ending in 0,1,8,9. Mos 5&6 are neg #s, but PAS will not allow.

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))

Pooling Administration System

 bruce.bennett@qwest.com (SP)

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

Your utilization calculates  percent. The FCC requires a utilization  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