



UT-051728 (NR)
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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

November 10, 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 Kent rate center.

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) full NXX code in the 253 area code, excluding NX0 and NX3. Qwest's inventory of available telephone numbers for assignment in the Kent 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

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) full NXX code to Qwest in the 253 area code, excluding NX0 and NX3, in the Kent 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

Pursuant to WAC 480-07-160(3), Qwest requests that portions of this information be held as confidential, as these documents contain valuable commercial information, the release of which would be detrimental to Qwest Corporation.

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

Unredacted Version

 bruce.bennett@qwest.com (SP)

[Sign Out](#)

Request Resources

State WASHINGTON

NPA 253

Rate Center KENT

OCN 9638-QWEST CORPORATION

Type of Application Application for a full NXX for a Dedicated Customer

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](#)

Request Full NXX (Dedicated Customer)

Do you already have a block/code in this rate center? Yes No
Will all blocks be activated on the same switch? Yes No
Will there be multiple block effective dates requested? Yes No
<input type="button" value="Back"/> <input type="button" value="Continue"/> <input type="button" value="Cancel"/>

Pooling Administration System

bruce.bennett@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Wednesday, November 9, 2005

OCN 9638

Company Name QWEST CORPORATION

Rate Center KENT

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

253-373, 253-520, 253-813, 253-850, 253-852, 253-854, 253-856, 253-859, 253-372-0, 253-372-1, 253-372-3, 253-372-4, 253-372-5, 253-372-6, 253-372-7, 253-372-9, 253-372-2, 253-372-8

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 * [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)

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		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) [REDACTED]

H. Months to Exhaust ² (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	[REDACTED]

I. Utilization² (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 [REDACTED]

Explanation

Specific customer request for full NXX DED-DID.
 No NX0 or NX3. Complete system revamp for new
 services. 2-3 year project, starting early 2006

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)(iv))

Pooling Administration System

 bruce.bematt@qwest.com (SP)

 Sign Out

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

Your utilization calculates to  percent. The FCC 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