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Qwest.

Spirit of Service®

Mark S. Reynolds
Senior Director – Regulatory
Public Policy

UT-091419-NR
OM 10-15-09
Consent

September 4, 2009

Mr. David Danner,
Executive Director & Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, Washington 98504

RECEIVED
RECORDS MANAGEMENT
2009 SEP -4 AM 9:56
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Vancouver Rate Center Numbering Waiver

Dear Mr. Danner:

By this letter Qwest is requesting a waiver of the utilization threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow PA/NeuStar, the Number Pooling Administrator, to assign two blocks of numbers that meets the needs of a specific Qwest customer.

The customer request is for 2,000 sequential telephone numbers in the 360 NPA, Vancouver Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and that the numbers be in a 360 NX4-8000-9999 block due to their existing internal dialing plan. The customer intends to start deploying these numbers on October 15, 2009. Qwest asks that the WUTC authorize NeuStar to open a new NXX and assign two blocks that would meet the customer's needs from the 360 NPA Vancouver Rate Center. The 360 NPA is forecasted to exhaust in the second quarter of 2012. There are 59 unassigned NXXs in the 360 NPA, and 9 blocks available in the PA pool inventory for the Vancouver Rate Center.

The customer does not have any telephone numbers to return since the new numbers in this request are for growth. The original customer request has been provided with this letter as Confidential Attachment A.

In our effort to satisfy the customer's request, Qwest submitted a request to PA/NeuStar on September 2, 2009 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B. In order for the request to be approved, Qwest will require a waiver of the current usage threshold for new numbering requests.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request for a large block of numbers. The waiver process is specifically addressed in the FCC Third Report and Order ("Order") as the "safety valve" process (See FCC 01-362, paras. 57-66), which went into effect on March 14, 2002. The Order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See Paras. 61,66)

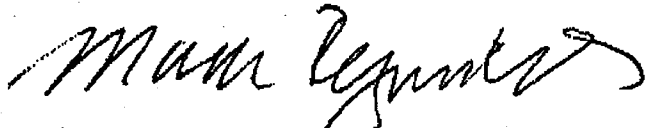
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/NeuStar to open a new NXX in the 360 NPA Vancouver Rate Center to accommodate our customer's request.

All directives can be emailed, faxed or mailed directly to:

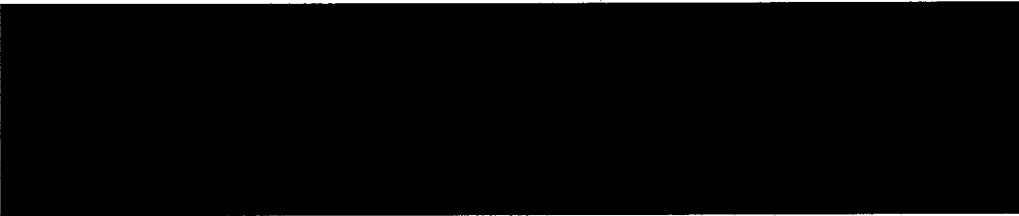
Kevin Gatchell
PA Code Administrator
NeuStar, Inc.
1800 Sutter St
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: Kevin.Gatchell@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please contact Kevin D. Manwarren at (303) 383-6550 or kevin.manwarren@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,



Attachments





ATTACHMENT A



Tuesday, August 11, 2009

Qwest Corporation

REDACTED


Mr. Ron Feightner:

 will be developing expanded patient care services to serve the greater Vancouver community. These efforts include several new acute care, ambulatory care and specialty care facilities. This October three additional acute care units will occupy expanded facilities at 

 has no additional DID allocations and will require as many as 2000 new DID telephone numbers. The date of requested availability is 10/15/2009. Without additional TN availability  will need to seek more aggressive number reclamation or alternative solutions.

The ideal DID range requirements will be in the ranges:



If these are not available additional DID ranges may be suitable if the NXX digits do not end with 0, 1 or 9.  dial plan will not allow for use of those digits. Thank you for your consideration of this request.



Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

ATTACHMENT B

REDACTED

Tracking Number: [REDACTED]

Type of Application: New Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **QWEST CORPORATION**

Headquarters Address: **1801 California**

City, State, Zip: **Denver ,CO ,80202**

Contact Name: **Bruce Bennett**

Contact Address: **700 W. Mineral, Room MN D18.12**

City,State,Zip: **Littleton, CO, 80120**

Phone: **303-707-7013** FAX: **303-707-9577**
mail: **bruce.bennett@qwest.com**

E-

Code Administrator: ²

Name: **David Morgan**
Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5381** FAX: **571-434-5502**

1.2 NPA: [REDACTED] NXX: ³ [REDACTED] LATA: [REDACTED] OCN: ⁴ [REDACTED]
Parent Company's OCN(s)

Switching Identification(Switch Entity/POI) ⁵

[REDACTED]

Locality/City/Wire Center: [REDACTED] Rate Center: ⁶ [REDACTED]

Homing Tandem Operating Co: ⁷ **Qwest** Tandem Homing
CLLI **[REDACTED]**
⁸

ATTACHMENT B

1.3 Dates: Date of Application: 09/02/2009

Request Effective Date: ^{9 10} 11/07/2009

REDACTED

By selecting this checkbox, I acknowledge that I am requesting the possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes X No _____

Expedited Explanation: Customer requests October in-service date.

1.4 a) Type of company/entity requesting the code: Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

e) Type of change (Mark all that apply)

OCN-Intra-company ¹¹ Switching Id Rate Center Tandem Homing CLLI

OCN-Inter-company ¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached X for B1
Additional Documentation is attached _____ Additional Documentation is not
attached X

ATTACHMENT B

REDACTED

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁶

Bruce Bennett

Signature of Code Applicant

**Regulatory
Compliance 09/02/2009
Manager**

Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code (s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code

of the switching entity/POI, and is the same on Part 2, Form 1, Page

ATTACHMENT B

⁹ Code applicants should request an effective date that is at least 66 ~~calendar days~~ from the submission of this form. It should be noted that interconnect arrangements and facilities need to be in place prior to activation of a **REDACTED** arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

TBPAG Attachment 1

ATTACHMENT B

Thousands-Block Application Form - Part 1A

REDACTED

Tracking Number:



Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **QWEST CORPORATION**
Headquarters Address: **1801 California**
City, State, Zip: **Denver, CO, 80202**
Contact Name: **Bruce Bennett**
Contact Address: **700 W. Mineral, Room MN D18.12**
City, State, Zip: **Littleton, CO, 80120**
Phone: **303-707-7013** FAX: **303-707-9577** E-mail: **bruce.bennett@qwest.com**

Pooling Administrator: ⁱⁱ

Contact Name: **Kevin Gatchell**
Contact Address: **1800 Sutter St**
City, State, Zip: **Concord, CA, 94520**
Phone: **925-363-8742** FAX: **925-363-7692**
E-mail: **kevin.gatchell@neustar.biz**

1.2 General Information:

Check one : No LRN needed **X** LRN needed ⁱⁱⁱ

ATTACHMENT B

NPA: [REDACTED] LATA: [REDACTED] OCN: iv 9638 Parent Company's OCN 9600

REDACTED

Number of Thousands-Blocks Requested : 2

Switching Identification(Switch Entity/POI) : v
[REDACTED]

City or Wire Center Name : _____

Rate Center: vi
[REDACTED]

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: vii
09/02/2009

Requested Block Effective Date: viii
11/07/2009

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes No

Expedited Explanation: [REDACTED]

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) [REDACTED]

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any

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 _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to activate in red and explicitly understand that the underlying CO code may not be activated in the PSTN and loaded in the NPAC on the block effective date.

ATTACHMENT B

REDACTED

Type of change(Mark **all** that apply)

- OCN:Intra-company ^{ix} Switching Id Part 1B
- OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks:

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 (ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Bruce Bennett

Signature of Block Applicant

**Regulatory
Compliance 09/02/2009
Manager**

Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the

Telcordia™ LERG™ Routing Guide. The Operating Company Number assigned to the service provider and the OCN its parent company. **ATTACHMENT B**

four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be **REDACTED**

The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider ^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code (s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this

application. An incomplete form may result in delays in processing

ATTACHMENT B

viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s)

REDACTED

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

ATTACHMENT B

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - IN LUVA
(Thousands-Block Number Pooling Growth Block Request)

REDACTED

Tracking Number: [REDACTED]

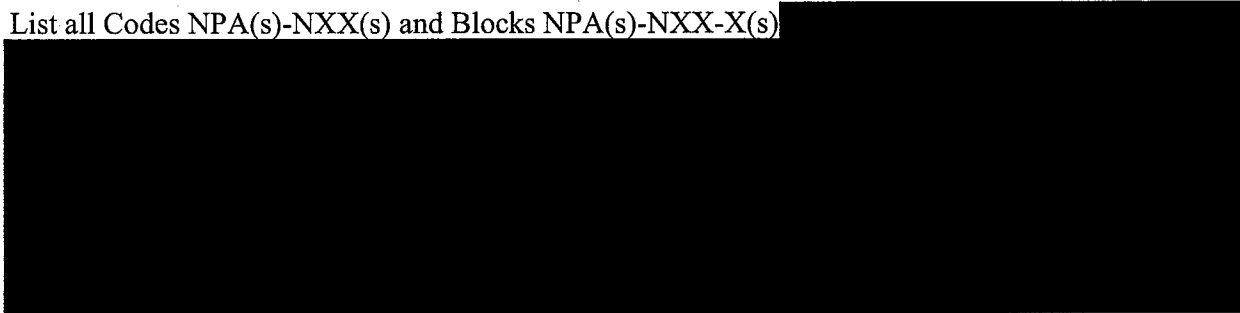
Date: 09/02/2009

OCN: 9638

Company Name: QWEST CORPORATION

Rate Center: VANCOUVER

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



Name of Block Applicant: Bruce Bennett

Signature: Bruce Bennett

Title: Regulatory Compliance Manager

Telephone No.: 303-707-7013

FAX No.: 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 (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: 0

List Excluded Code(s) or Block(s):

Month Month Month Month Month Month Month Month Mo
 #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12

ATTACHMENT B

REDACTED

E. Growth History - Previous 6 months³

[REDACTED]

F. Forecast - Next 12 months⁴

[REDACTED]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):

[REDACTED]

H. Months to Exhaust⁵

Numbers Available for Assignment to Customers(A)

=

Average Monthly Forecast(G)

Block Requested

Available Numbers

Months To Exhaust

[REDACTED]

I. Utilization⁶

$\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 =$

=

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation: _____

¹A 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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most re

ATTACHMENT B

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (F 52.15 (g)(3)(ii))

REDACTED

November 21, 2003
ATIS-0300066.at3

ATTACHMENT B

Pooling Administrator's Response/Confirmation
TBPA Part 3

REDACTED

Tracking Number : 

Date of Application: 09/02/2009 Effective Date: _____
Date of Receipt: 09/02/2009 Date of Response: 09/02/2009

Service Provider Name: QWEST CORPORATION
(Telcordia™ LERG™
Routing Guide) OCN: 9638

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-363-8742

Signature of Pooling Administrator

Kevin Gatchell Fax: 925-363-7692

Name (print)


Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-
NXX-X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code Modified : _____
Block/Code
Disconnected : _____

Block Contaminated(Yes or No) : _____


If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹ 

Rate Center: _____

Rate Center Sub Zone: _____

Form Complete, request denied.

Explanation:


___ **Request withdrawn.**
Explanation:

ATTACHMENT B

___ **Assignment activity suspended by the administrator.**
Explanation:

REDACTED

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)