



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

Holly Dean
 Manager – Regulatory
 Public Policy

RECEIVED
 COMMUNICATIONS
 DIVISION
 AUG 16 9 11:39 AM '05

August 3, 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

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

Qwest is requesting from NeuStar/NANPA, the Washington Number Pooling Administrator, one (1) full NXX code in the 425 area code, Bellevue rate center. Qwest's inventory of telephone numbers available for assignment in Bellevue can not meet the special needs of a specific customer. Should this request for (1) full NXX code in the Bellevue rate center be granted, we are requesting that the code not begin or end with "0", "1" or "9" due to customer system limitations.

Qwest submitted requests to NeuStar for additional numbering resources in the above referenced rate center. However, the request was denied as Qwest did not meet the utilization 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 425 area code, avoiding the code beginning with "0", "1" or "9".

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,

A handwritten signature in black ink, appearing to read "Holly Dean", with a large, sweeping flourish extending to the right.

Holly Dean

Attachments