

CENTURYLINK
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Mark S. Reynolds
Vice President of Public Policy
NW Region

January 12, 2015

Via email

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Whatcom County Rate Center Numbering Waiver

Dear Mr. King:

By this letter Qwest Corporation d/b/a CenturyLink QC ("CenturyLink") is requesting a waiver of the utilization 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 open and assign two new one thousands block of numbers that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 2,000 consecutive numbers, excluding the 0XXX, 7XXX and 9XXX Blocks, in order to maintain their internal dialing plan. The numbers are required for the implementation of a new phone system that incorporates Direct Inward Dialing to all employees and to all main department numbers. If any numbers are returned, the amount will be minimal. The original customer request has been provided with this letter as Confidential Attachment A.

The 360 NPA is forecasted to exhaust in 3Q2017. There are 35 unassigned NXXs in the 360 NPA and 72 Blocks available in the PA pool inventory for the Whatcom County Rate Center, several of which are in the format which will fulfill the customer request. The customer will not be returning any numbers in association with this request.

In our effort to satisfy the customer's request, CenturyLink submitted a request to PA/Neustar on January 8, 2015 for additional numbering resources. That application and the subsequent denial

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have been provided as Confidential Attachment B. In order for the request to be approved, CenturyLink 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, ¶¶ 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 ¶¶ 61, 66).

CenturyLink 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 assign 2 sequential thousands Blocks (2,000 consecutive numbers) in the 360 NPA Whatcom County 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 Street
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 Bruce Bennett at (303) 707-7013 or bruce.bennett@centurylink.com. We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,

Mark Reynolds

/MSR