

CENTURYLINK
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Philip E. Grate
State Regulatory Affairs Director

March 28, 2018

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

Re: Safety Valve Waiver Request

Dear Mr. King:

By this letter Qwest Corporation d/b/a CenturyLink (“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 one block from a new NXX to establish an LRN to the customer’s new switch.

Specifically, the customer has requested 1000 DID consecutive numbers to establish service for this new switch. This request is for a new Code to establish LRN for a new switch in the Crystal Mountain Rate Center.

The 360 NPA is forecasted to exhaust in the fourth quarter of 2017. There are 19 unassigned NXXs in the 360 NPA and zero blocks available in the PA pool inventory for the Crystal Mountain Rate Center. Once our request is approved, CenturyLink will assign the requested numbers to the customer within six months from the LERG effective date.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/NeuStar on March 22, 2018 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment A pursuant to WAC 480-07-160. The application contains proprietary customer information. In order for the request to be approved, CenturyLink will require a waiver of the current usage threshold for new numbering requests.

Received
Records Management
03/28/18 13:20
via email
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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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 open a new NXX in the Crystal Mountain 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 Rita Schmitz at (608) 796-5600 or rita.schmitz@centurylink.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Philip E. Grate

Enclosures