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Mark S. Reynolds  
Senior Director – Regulatory  
Public Policy



November 21, 2006

Re: Olympia Rate Center Numbering Waiver

Ms. Carole Washburn,  
Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive S. W.  
Olympia, Washington 98504

Dear Ms. Washburn:

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 reserve and assign the 360-252-3XXX block for use by a Qwest customer.

The customer request is for 100 sequential telephone numbers in the 360 NPA, Olympia Rate Center. Specifically, the customer has requested numbers within either a 3XXX, 6XXX or 7XXX thousand-blocks associated within any 360-NXX. Currently there is only one number block in the inventory pool that meets the customer's criteria - 360-252-3XXX. Qwest asks that the WUTC send an email to the PA to hold this block pending regulatory approval of this request. The customer has an immediate need for the numbers in their operations, so no numbers will returned to the numbering pool. 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 November 17, 2006 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)

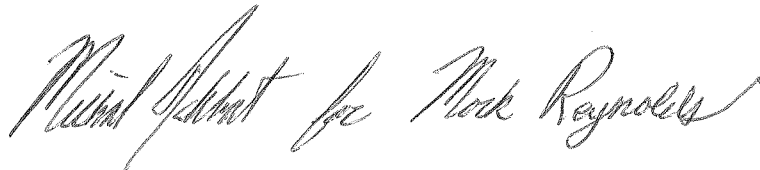
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust threshold requirements, and direct PA/NeuStar to hold the 360-252-3XXX block until the WUTC acts on this waiver request.

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

Kevin Gatchell  
PA Code Administrator  
NeuStar, Inc.  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 925-363-8742  
Fax: 925-363-7692  
Email: kevin.gatchell@neustar.com

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please contact Michael Dalebout at (801) 237-7634 or michael.dalebout@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,

A handwritten signature in cursive script that reads "Michael Dalebout for Mark Reynolds". The signature is written in dark ink and is positioned below the "Very truly yours," text.

Attachments