

Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, Washington 98191
Office (206) 345-1568
Facsimile (206) 343-4040

Mark S. Reynolds
Senior Director – Regulatory
Public Policy



January 31, 2007

Re: Tacoma 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 253-301-5 block and the 253-301-6 block, pending a final decision from the WUTC. The customer is expanding their operation, and is in immediate need of these numbers.

The request is for 2,000 sequential telephone numbers in the 253 NPA, Tacoma Rate Center. Our customer has specifically requested numbers that fit with their internal dialing plan. Currently two number blocks in the inventory pool meets the customer's criteria - 253-301-5 and 253-301-6. Qwest requests that the WUTC send an email to the PA Code Administrator, asking them to hold these blocks for Qwest, pending regulatory approval of this waiver. After receiving these numbers, the customer will be returning nearly 500 numbers back into circulation. 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 January 30, 2007 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B & C respectively. In order for the request to be approved, Qwest will require a waiver of the current usage threshold for new numbering requests. The PA/NeuStar website shows 5 blocks currently available in the PA pool inventory for the WA 253 Tacoma Rate Center. The NANPA/ NeuStar website shows 393 unassigned NXXs in the WA 253 NPA, and a projected NPA exhaust of 1Q2023.

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)

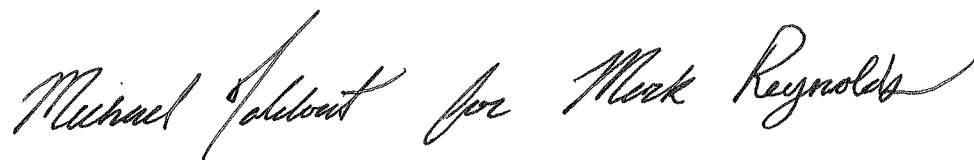
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust threshold requirements, and direct PA/NeuStar to hold the 253-301-5 and 253-301-6 blocks until the WUTC acts on this waiver request. Qwest is evaluating two blocks of one thousand numbers in Qwest’s existing inventory for the Tacoma Rate Center that may be donated to the PA/NeuStar should they have less than 10% contamination.

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 black ink and is positioned below the "Very truly yours," text.

Attachments