

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



April 6, 2007

Re: Seattle 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 206-631-3,4,5,6,7 blocks for use by a Qwest customer.

The customer request is for 5,000 sequential telephone numbers in the 206 NPA, Seattle Rate Center. Specifically, the customer has requested that the number not be from a 0, 1, or 9 blocks due to their internal dialing plan. There is currently a number block range in the inventory pool that meets this criteria – 206-631-3,4,5,6,7. Qwest asks that the WUTC send an email to the PA to hold this block pending regulatory approval of this request. If these numbers are not reserved, it is likely that Neustar will need to open a new NXX to satisfy this customer's request. Qwest asks that the WUTC authorize the opening of a new NXX in their approval order, if necessary, to meet the customers needs.

The customer has an immediate need for the numbers to support a new centralized district VoIP phone system, where DID numbers will be assigned to each phone in the district. The new system will include all schools, buildings, and support facilities. The move is a component of the customer's requirement to be in compliance with e911 requirements as directed by OSPI and the state of WA Fire Marshalls. Some 400 existing numbers will be returned upon the move to the new system. 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 April 3rd, 2007 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 206-631-3,4,5,6,7 blocks until the WUTC acts on this waiver request. The current projected exhaust for NPA 206 is 4Q2022. There are currently 10 1K blocks available and 232 NXX codes unassigned as of April 4, 2007 in the PA pool inventory for the Seattle Rate Center.

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 black ink that reads "Michael Dalebout for Mark Reynolds". The signature is written in a cursive, flowing style.

Attachments