

WT-072006-NR
11-7-07 OM
Consent

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Mark S. Reynolds
Senior Director – Regulatory
Public Policy



October 5, 2007

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

RECEIVED
REGISTRATION DIVISION
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Re: WHATCOMCTY Rate Center Numbering Waiver

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 assign two 1K blocks in the 360 NPA.

The customer request is for 2,000 sequential telephone numbers in the 360 NPA, Whatcomcty Rate Center. Specifically, the customer has requested that the numbers be in the range 7000-8999 in a single prefix. Should that range not be available, the last 4 digits of any other 1K block must not begin with 0, 1, or 9, in order to meet internal dialing plan requirements. Currently there are available 1K blocks in the PA pool inventory that could satisfy this request, although Qwest also 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 the implementation of a new telephone system with internal dialing plan requirements. Some 700-800 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.

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RMS
Email
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In our effort to satisfy the customer's request, Qwest submitted a request to PA/NeuStar on October 1st, 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 and rate center utilization threshold requirements, and direct PA/NeuStar to assign Qwest two 1K blocks as previously specified 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 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 Kevin D. Manwarren at (303) 896-1016 or kevin.manwarren@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,

 on behalf of
Mark S. Reynolds

Attachments