

LT-072007-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

Re: Spokane 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 reserve and assign two 1K blocks in the 509 NPA.

The customer request is for 2,000 sequential telephone numbers in the 509 NPA, Spokane Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and the last 4 digits must not begin with 9 in order to work with new internal dialing plans requirements. Currently there are available 1K blocks in the PA pool inventory, but should those blocks be subsequently assigned to another carrier, 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 the consolidation of four locations due to recent acquisitions, and to support planned growth in the next 2-3 years. Approximately 1,128 existing numbers (small non-sequential blocks) will be returned once the new numbers are in service. The original customer request has been provided with this letter as Confidential Attachment A.

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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)

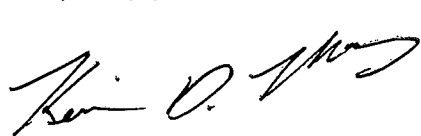
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust and rate center utilization threshold requirements, and direct PA/NeuStar to assign Qwest two 1K blocks(2,000 sequential numbers) to accommodate our customer's request.

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