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Public Policy



WTC-080212-NR
Om 2-28-08
No Action

January 31, 2008

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

RECEIVED
RECORDS MANAGEMENT
2008 FEB -4 PM 1:35
STATE OF WASH.
UTILITY AND TRANSP.
COMMISSION

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 open a new NXX to meet the needs of a specific Qwest customer.

The customer request is for an entire NXX in the 509 NPA, Spokane Rate Center. Qwest asks that the WUTC authorize the opening of a new NXX in their approval order to meet the customer's needs. Currently NANPA has forecasted exhaust of the 509 NPA to be 1st Quarter 2013 with 154 NXXs available for assignment out of the 509 NPA. Currently, the PA has 46 blocks available for assignment in the Spokane Rate Center, none of which would fulfill the customer's request for an entire NXX.

The customer has an immediate need for the numbers to meet their five year growth plan. The original customer request has been provided with this letter as Confidential Attachment A. The customer will return approximately 5,000 numbers beginning with the initial assignments in the new NXX. These numbers will be returned to Qwest as the replacement numbers are assigned, and then go through the normal business intercept and aging process. After the aging and intercept period, any thousands blocks will be considered for donation to the PA pool inventory.

In our effort to satisfy the customer's request, Qwest submitted a request to PA/NeuStar on January 29, 2008 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)

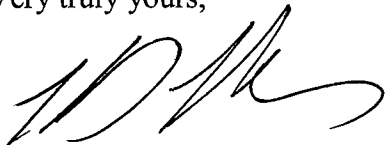
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust and rate center utilization threshold requirements, and direct PA/NeuStar to open a new NXX in the Spokane Rate Center and assign Qwest the NXX to accommodate our customer's request.

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,

 for Mark Reynolds

Attachments