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No
Action

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Mark S. Reynolds
Senior Director – Regulatory
Public Policy



January 31, 2008

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

RECEIVED
REGULATORY MANAGEMENT
2008 FEB -4 PM 1:34
OFFICE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Yakima 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 200 sequential telephone numbers in the 509 NPA, Yakima Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and the last 4 digits cannot begin with 0, 1, 8, or 9 in order to work with their internal dialing plan requirements. Currently the only available blocks in the PA pool inventory begin with 8 or 9. Qwest asks that the WUTC authorize the opening of a new NXX in their approval order to meet the customer's needs. The 509 NPA is forecasted to exhaust in the first quarter of 2013. There are 154 unassigned NXXs in the 509, but only 2 thousands blocks in the PA pool inventory for the Yakima Rate Center. The two NXX blocks are 8XXX and 9XXX, which won't work for this request. Qwest would keep one thousands block from the new NXX, while the other nine blocks would be retained by the PA to replenish the Pool Inventory.

The customer has an immediate need for the numbers as their existing resources have been exhausted. 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 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 Yakima Rate Center and assign Qwest a thousands block 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