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Mark S. Reynolds  
Senior Director – Regulatory  
Public Policy

May 7, 2008

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

Re: Whatcom 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 360 NPA to meet the needs of a specific Qwest customer.

The customer request is for 2,000 sequential telephone numbers in the 360 NPA, Whatcom 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. The customer intends to have the new numbers in use by mid-June and is requesting that the numbers be available no later than June 1, 2008. Qwest asks that the WUTC authorize Neustar to reserve and assign 2 blocks that would meet the customer's needs from the 360 NPA Whatcom Rate Center. The 360 NPA is forecasted to exhaust in the fourth quarter of 2011. There are 67 unassigned NXXs in the 360, and 125 blocks in the PA pool inventory for the Whatcom Rate Center.

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 May 5, 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)

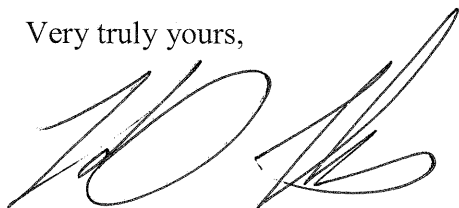
Qwest respectfully requests that the Commission approve the request for a waiver of months to exhaust and rate center utilization threshold requirements, and direct PA/NeuStar to reserve and assign two 1K blocks in the 360 NPA in the Whatcom Rate Center to accommodate our customer's request.

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