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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

October 3, 2008

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

Re: Seattle 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 5,000 sequential telephone numbers in the 206 NPA, Seattle Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and that the NXX cannot end with a 1 or 9 in order to work with their internal dialing plan requirements. The customer intends to have the new numbers in use by first quarter 2009. Qwest asks that the WUTC authorize NeuStar to reserve and assign an NXX that would meet the customer's needs from the 206 NPA Seattle Rate Center. The 206 NPA is forecasted to exhaust in the second quarter of 2023. There are 219 unassigned NXXs in the 206, and 0 blocks in the PA pool inventory for the Seattle Rate Center.

The customer intends on returning over 3,360 of their current inventory of telephone numbers after the new numbers are in service. 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 September 30, 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 one NXX in the 206 NPA in the Seattle Rate Center to accommodate our customer's request. Qwest would retain five blocks from the new NXX and immediately donate the remaining five blocks to the industry pool for future assignment.

All directives can be emailed, faxed or mailed directly to:

David Morgan
PA Code Administrator
NeuStar, Inc.
46000 Center Oak Plaza
Sterling, VA 20166
Phone: 571-434-5381
Fax: 571-434-5502
Email: david.morgan@neustar.biz

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,



Attachments