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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

December 1, 2008

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

Re: Puyallup 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 assign a block of numbers that meet the needs of a specific Qwest customer.

The customer request is for 1,000 sequential telephone numbers in the 253 NPA, Puyallup Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and that the numbers be within the specific range of 3000-3999 in order to work with their internal dialing plan requirements. The customer intends to start implement the new numbers as soon as possible continuing through 2009. Qwest asks that the WUTC authorize NeuStar to assign a block that would meet the customer's needs from the 253 NPA Puyallup Rate Center. The 253 NPA is forecasted to exhaust in the second quarter of 2028. There are 381 unassigned NXXs in the 253 NPA, and 45 blocks in the PA pool inventory for the Puyallup Rate Center.

The customer does not intend on returning any of their current inventory of telephone numbers after the new numbers are in service since this request is for internal growth. 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 November 21, 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 block in the 253 NPA in the Puyallup 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
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: Kevin.Gatchell@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