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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

May 15, 2009

Mr. David Danner,
Executive Director & Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, Washington 98504

Re: Pasco Rate Center Numbering Waiver

Dear Mr. Danner:

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 two blocks of numbers that meets the needs of a specific Qwest customer.

The customer request is for 1,800 sequential telephone numbers in the 509 NPA, Pasco Rate Center. Specifically, the customer has requested that the numbers be in a single prefix and that the numbers not be in a 0XXX, 1XXX, or 9XXX block due to their internal dialing plan. The customer intends to start deploying these numbers on July 1, 2009. Qwest asks that the WUTC authorize NeuStar to assign two blocks that would meet the customer's needs from the 509 NPA Pasco Rate Center. The 509 NPA is forecasted to exhaust in the first quarter of 2015. There are 148 unassigned NXXs in the 509 NPA, and 13 blocks available in the PA pool inventory for the Pasco Rate Center.

The customer does not have any telephone numbers to return since the new numbers in this request are for 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 May 14, 2009 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 requirements, and direct PA/NeuStar to reserve and assign two blocks in the 509 NPA Pasco 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) 383-6550 or kevin.manwarren@qwest.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,



Attachments