

CENTURYLINK
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Mark S. Reynolds
Director, Western Region
Regulatory Affairs

February 22, 2012

Via email

Mr. David Danner
Secretary and Executive Director
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Seattle Rate Center Numbering Waiver

Dear Mr. Danner:

By this letter Qwest Corporation d/b/a CenturyLink (“CenturyLink”) is requesting a waiver of the utilization 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 and assign a new NXX that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 10,000 sequential TNs in the Seattle Rate Center, with the format of NX7 to be used to accommodate its internal dialing plan. The customer plans to return 18,998 numbers upon receipt of a new NXX code. Blocks of 1,000 sequential TNs will be donated to the Industry Pool Inventory, as they are returned and aged according to Industry guidelines. The original customer request has been provided with this letter as Confidential Attachment A.

The 206 NPA is forecasted to exhaust in the first quarter of 2025. There are 196 unassigned NXXs in the 206 NPA and 51 blocks available in the PA pool inventory for the Seattle Rate Center.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/NeuStar on February 16, 2012 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B. In order for the request to be

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approved, CenturyLink 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, ¶¶ 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 ¶¶ 61, 66).

CenturyLink respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/NeuStar 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 Street
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 Bruce Bennett at (303) 707-7013 or bruce.bennett@centurylink.com. We would appreciate being copied on any correspondence with PA/NeuStar.

Sincerely,

Mark Reynolds

MSR:mep
Enclosures