

CENTURYLINK
1600 7th Avenue, Room 1506
Seattle, Washington 98191
(206) 345-1568

Mark S. Reynolds
Northwest Region Vice President
Public Policy

June 12, 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: Bellevue 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 assign a new thousands block that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 1000 sequential TNs in the 8XXX range, to be used to accommodate safety and emergency calls to 911. There will be no returns of existing TNs. The original customer request has been provided with this letter as Confidential Attachment A.

The 425 NPA is forecasted to exhaust in the third quarter of 2032. There are 279 unassigned NXXs in the 425 NPA and 14 blocks available in the PA pool inventory for the Bellevue Rate Center. Of the 14 available blocks, there are 2 blocks in the 8XXX range, which means a new NXX Code will not need to be opened for assignment.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/Neustar on June 7, 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 approved, CenturyLink will require a waiver of the current usage threshold for new numbering requests.

Mr. David Danner

June 12, 2012

Page 2

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