

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

Mark S. Reynolds  
Northwest Region Vice President  
Public Policy

August 20, 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: Auburn 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 4,000 sequential TNs, to be used to accommodate transition to a new phone system, growth and acquisition. An existing 2,500 TNs will be returned upon completion of transition to the new number range. Any block of 1,000 TNs with 10% or less contamination being returned will be donated to the Industry Pool. Large blocks of returned TNs will be protected for future requests for large number blocks. The 1,500 new incremental numbers are required for the acquisition of twelve clinics in the Auburn community. The original customer request has been provided with this letter as Confidential Attachment A.

The 253 NPA is forecasted to exhaust in the fourth quarter of 2031. There are 374 unassigned NXXs in the 253 NPA and 13 blocks available in the PA pool inventory for the Auburn Rate Center.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/Neustar on August 13, 2012 for additional numbering resources. That application and the subsequent denial

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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.

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](mailto: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](mailto:bruce.bennett@centurylink.com). We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,

Mark Reynolds

MSR:mep  
Enclosures