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Phil Grate
Director
Regulatory and Legislative Affairs

February 5, 2014

*Via Email
And Overnight Delivery*

Mr. Steven King
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. King:

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 a new NXX and assign the full NXX code of ten thousands blocks that meets the needs of a specific CenturyLink customer.

Specifically, the customer has requested 10,000 sequential TNs in the Seattle Rate Center in the format of NX5, NX7 or NX6, to be used to accommodate its internal dialing plan and support rapid expansion and growth. There will be no return of existing TNs. The original customer request has been provided with this letter as Confidential Attachment A.

The 206 NPA is forecasted to exhaust in the fourth quarter of 2024. There are 181 unassigned NXXs in the 206 NPA and 15 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 4, 2014 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B. In order for

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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

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,

A handwritten signature in black ink that reads "Philip E. Grate". The signature is written in a cursive, flowing style.

Philip E. Grate

Enclosures