# **CENTURYLINK**

# 1600 7th Avenue, Room 1506

# Seattle, Washington 98191

# (206) 345-1568

# Facsimile (206) 343-4040

# Mark S. Reynolds

# Vice President of Public Policy

# NW Region

#

July 30, 2015

Via email

Mr. Steven V. King

Executive Director and Secretary

Washington Utilities and

 Transportation Commission

1300 S. Evergreen Park Dr. S.W.

P.O. Box 47250

Olympia, Washington 98504-7250

Re: Issaquah Rate Center Numbering Waiver

Dear Mr. King:

By this letter Qwest Corporation d/b/a CenturyLink QC (“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 one block of numbers that meet the needs of a specific CenturyLink customer.

Specifically, the customer has requested 1000 consecutive numbers, in the 425-XXX-9000-9999 Block range, in order to maintain their internal dialing plan. The numbers will be added to the customer’s existing inventory for facility growth and expansion; 1100 numbers will be returned. The original customer request has been provided with this letter as Confidential Attachment A pursuant to WAC 480-07-160.

The 425 NPA is forecasted to exhaust in the first quarter of 2037. There are 264 unassigned NXXs in the 425 NPA and 44 Blocks available in the PA pool inventory for the Issaquah Rate Center, five which would fulfill the customer’s request for a clean ‘9’ Block.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/Neustar on July 27, 2015 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B pursuant to WAC 480-07-160. 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 assign 1000 sequential numbers in the 425 NPA Issaquah 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 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 Rita Schmitz at (608) 796-5600 or rita.schmitz@centurylink.com. We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,

Mark Reynolds

/MSR