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Philip E. Grate
State Regulatory Affairs Director

April 6, 2020

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Via web portal

Mr. Mark Johnson
Secretary and Executive Director
Washington Utilities and
Transportation Commission
621 Woodland Square Loop SE
Olympia, Washington 98503

Re: Safety Valve Waiver Request

Dear Mr. Johnson:

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 one block from the 509 NXX Spokane Rate Center to align with a customer’s current plan.

Specifically, the customer has requested 1000 continuous numbers by September 2020 to expand its internal dialing plan and has requested that the numbers begin with 8xx to match the internal dialing scheme in the Spokane Rate Center.

The 509 NPA is forecasted to exhaust in the first quarter of 2026. There are 71 unassigned NXXs in the 509 NPA and 23 blocks available in the PA pool inventory for the Spokane Rate Center. Upon approval of this request, CenturyLink will assign the requested numbers to the customer within six months from the LERG effective date. The customer request is attached hereto as Confidential Attachment A pursuant to WAC 480-07-160. The customer request and application contain proprietary customer information.

In our effort to satisfy the customer’s request, CenturyLink submitted a request to PA/NeuStar on April 2, 2020 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.

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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 a Block to CenturyLink in the Spokane 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,

Philip E. Grate

Enclosures