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August 28, 2013

**TO: PUBLIC SERVICE COMMISSION**

**FROM: DIVISION OF PUBLIC UTILITIES**

Chris Parker, Director  
Bill Duncan, Manager, Telecommunications and Water  
Paul M. Anderson, Utility Technical Consultant

**RE:** Request for waiver by Qwest Corporation dba CenturyLink QC (CenturyLink) of the threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 Released in FCC Docket No 99-200 for a location served by RVTNUTMADSO within the Midvale Rate Center. Docket No. 13-049-17

**RECOMMENDATION: Approve Waiver**

The Division recommends that the Commission approve Century Link's request for a waiver of threshold requirements and direct PA/NeuStar, the Numbering Plan Administrator (NPA), to provide the requested three blocks of 1,000 sequential numbers (3,000 numbers) to accommodate a request for a CenturyLink customer in the Utah 385 NPA Midvale Rate Center.

**BACKGROUND:**

On August 26, 2013, CenturyLink requested a waiver of the threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200. CenturyLink had previously submitted a request for the numbers to PA/NeuStar which was immediately denied based on Century Link's Months to Exhaust (MTE) and/or Utilization threshold for new numbering requests. The FCC has affirmed that in instances where a carrier has neither the inventory to satisfy a specific customer request, nor the utilization for obtaining more numbers, the State Commission

may grant relief to carriers with a “verifiable need due to the carrier’s inability to satisfy a specific customer request.”<sup>1</sup>

This inability can be demonstrated to the State Commission by the carrier providing “documentation of the customer request and current proof of utilization in the rate center.”<sup>2</sup>

**REQUEST:**

Qwest Corporation has provided documentation indicating that its customer is requesting 3,000 telephone numbers in the 385 NPA, Midvale Rate Center, which it cannot provide based on its current inventory.

**ANALYSIS:**

The customer is requesting 3,000 telephone numbers from 385 NPA. These telephone numbers are required for future/planned growth. The issuance of these number blocks will not significantly affect the available number pool in the 385 NPA, nor will it affect the exhaust date of the 385 NPA.

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<sup>1</sup> *In the Matter of Numbering Resource Optimization Implementation of the Local Competition Provision of the Telecommunications Act of 1996 Telephone Number Portability, Report and Order & 2<sup>nd</sup> order on Reconsideration in CC Docket No. 96-98 & in Docket No. 99-200, Fcc oI-362, 3<sup>rd</sup> Report & Order ¶61 (2001)*

<sup>2</sup> ID., at ¶64.