



CenturyLink®

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May 24, 2016

Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Dear Mr. Widerburg:

Qwest Corporation dba CenturyLink QC (CenturyLink) respectfully request a numbering waiver in order to obtain the additional numbering resources to meet a specific customer request at a location served by the KRNSUTMADS1switch within the Midvale Rate Center. This waiver will allow PA/Neustar, the Number Pool Administrator, to provide five blocks of 1,000 sequential numbers (5,000 numbers) in the 385 NPA with a NNX that ends with 7, within the Midvale Rate Center necessary for CenturyLink to meet the specific customer request.

In the attached confidential letter, the customer requested 5,000 numbers in the xx7-xxxx range within the 801 NPA. Because of the customer's intricate internal dialing plan they specifically need an NXX that ends in "7." However, it was determined that there are no codes left in the 801 NPA to meet this specific requirement. CenturyLink discussed the situation with the customer and determined that they could also accept 5,000 number from the NPA 385, as long as it was in a NNX that ended in "7" (xx7). The customer prefers getting numbers within a 385-xx7-2, 385-xx7-3, 385-xx7-4, 385-xx7-5, 385-xx7-6 range.

According to FCC requirements (47 CFR 52.15 (g), to qualify for additional numbering resources a service provider must submit paperwork demonstrating that the rate center for which the numbers are requested is at or less than six Months-To-Exhaust (MTE) and is at 75% or more utilization. In cases where a service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions will have jurisdiction to grant a waiver pursuant to FCC 01-362, Section IV, C, paragraphs 57-66. In paragraph 66 of this same order, the FCC recommends that the state commissions respond within 10 days of a waiver request.

In order to satisfy the customer's request, CenturyLink submitted a request for the numbers and supporting documents¹ to the PA/Neustar and the request was denied on May 19, 2016² because CenturyLink does not meet the utilization requirements and because the months-to-exhaust was too high. In order for the request to be approved, CenturyLink will require a waiver approval by the Utah Public Service Commission (Commission) to override the PA/Neustar denial of resources.

CenturyLink respectfully requests that the Commission approve the request for this waiver and direct PA/Neustar to assign the requested numbers in the 385 NPA with a NXX that ends in "7", preferably within a 385-xx7-2, 385-xx7-3, 385-xx7-4, 385-xx7-5, 385-xx7-6 range. These numbers will be assigned to the Midvale Rate Center and to be used in the KRNSUTMADS1 switch. The directive can be emailed or faxed to:

Genevieve Bettiga
Pooling Administrator
NeuStar, Inc.
Email: genevieve.bettiga@neustar.biz
Fax: 925-363-7683

Sincerely,

cc Rita Schmitz

¹ TBPAG Attachment 1 – Thousands-Block Application Form – Part 1A and Central Office Code (NXX) Assignment Request; Confidential Appendix 3 – Months To Exhaust and Utilization Certification Work Sheet.

² Attachment 3– Pooling Administrator Denial