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January 10, 2018

Via Efiling Only

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 d/b/a CenturyLink QC (CenturyLink) respectfully request a numbering waiver to obtain the additional numbering resources to meet a specific customer request at a location served by the WASHUTMADS0 switch within the ST George Rate Center. This waiver will allow PA/Neustar, the Number Pool Administrator, to provide one, 1,000 number block¹ in the 435 NPA, 522 NNX to be assigned to the WASHUTMADS0 switch within the ST George Rate Center necessary for CenturyLink to meet the specific customer request.

In the confidential letter², the customer is requesting 120 sequential numbers³ in the in 435 NPA in any NNX in the range of XXX-X100 to XXX-X219. The customer's request for the sequential numbers stems from the intended use of the building and prevents unnecessary complexity that would result of having many non-sequential numbers assigned to one location. (Both Confidential Attachment A – customer letter and Confidential Attachment C to this request are being provided via the Commission's SFTP server.)

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

¹ CenturyLink specifically has requested 435-522-2000 to 435-522-2999, or 435-522-3000 to 435-522-3999 which are the two available 1000 number blocks within the 522 NNX.

² Confidential Attachment A.

³ A 1-thousand number block is the smallest amount of numbers that can be assigned.

same order, the FCC recommends that the state commissions respond within 10 days of a waiver request.

To satisfy the customer's request, CenturyLink submitted a request for the numbers and supporting documents⁴ to the PA/Neustar and the request was denied on January 9, 2018⁵ because CenturyLink does not meet the utilization requirements and because the months-to-exhaust is 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 make the necessary assignment of numbering resources so that CenturyLink can meet the customer's request. Specifically directing PA/Neustar to provide one, 1,000 number block⁶ in the 435 NPA, 522 NNX to be assigned to the WASHUTMADS0 switch within the ST George Rate Center.

The directive can be emailed or faxed to:

Margaret Harrell-Simington
Pooling Administrator
Neustar, Inc.
Email: margaret.harrell-simington@neustar.biz
Fax: 925-363-8747

Sincerely,



James B. Farr

cc: Rita Schmitz, CenturyLink

⁴ Attachment B – Thousands-Block Application Form – Part 1A and Central Office Code (NXX) Assignment Request; and Confidential Attachment C - Months To Exhaust and Utilization Certification Work Sheet.

⁵ Attachment D– Pooling Administrator Denial

⁶ CenturyLink specifically has requested 435-522-2000 to 435-522-2999, or 435-522-3000 to 435-522-3999 which are the two available 1000 number blocks available within the 522 NNX.