



TORRY SOMERS

December 19, 2018

Via Electronic Filing 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 dba CenturyLink QC (CenturyLink) respectfully requests a numbering waiver to obtain the additional numbering resources necessary to meet a specific customer request for a new campus expansion served by the LEHIUTMADS0 switch within the LEHI Rate Center. This waiver will allow PA/Neustar, the number pool administrator, to provide one block of 1,000 sequential numbers in the 801 NPA to meet a specific customer request.¹ In the attached confidential letter, the customer requested 200 sequential numbers which CenturyLink cannot meet with existing inventory.

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.

To satisfy the customer's request, CenturyLink submitted a request for the numbers and supporting documents² to the PA/Neustar and the request was denied on December 18, 2018³ because CenturyLink does not meet the utilization requirements and because the

¹ No preference for the NXX code, but can't use blocks 0, 1 or 9 due to customer internal dialing restrictions.

² **Attachment A** – Central Office Code (NXX) Assignment Request-Part 1 and Thousands-Block Application Form – Part 1A and **Confidential Attachment B**, Central Office Code (NXX) Assignment Request; Confidential Appendix 3 – Months to Exhaust and Utilization Certification Work Sheet.

³ **Attachment C** – Pooling Administrator Denial.

6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775

torry.r.somers@centurylink.com

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months-to-exhaust was too high. 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 1,000 block of sequential numbers within the 801 NPA, and any block in any available NXX, with the exception of block 0,1, or 9. These numbers will be assigned to the LEHI rate center and will be used in the LEHIUTMADS0 switch. The directive can be emailed or faxed to:

Margaret Harrell-Simington
Pooling Administrator
NeuStar, Inc.
Email: mharrell-simington@somos.com
Fax: 925-363-8747

Confidential Attachment B and the Confidential Customer Letter have been uploaded onto the PSC's SFTP server. If you have any questions, please contact me at (702) 244-8100. Thank you for your assistance.

Sincerely,



Torry R. Somers
Assistant General Counsel

Attachment
cc: Torry Somers
Rita Schmitz
Linda Stinar
Jennifer Somers

6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
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Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking
Number: **801-LEHI-UT-1134156**

Full NXX: Pool
Replenishment

Type of
Application: ☒ New ☐ Change¹
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
Name: **QWEST CORPORATION**

Headquarters
Address: **100 CenturyLink Dr**

City, State, Zip: **Monroe, LA, 71203**

Contact Name: **Rita Schmitz**

Contact
Address: **333 N Front Street**

City: **La Crosse** State: **WI** ZIP: **54601**

Phone: **608-796-5600** Fax :

E-mail: **Rita.Schmitz@CenturyLink.com**

Code Administrator:²

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City: **Sterling** State: **VA** ZIP: **20166**

Phone: **571-434-5381** Fax : **571-434-5502**

NXX:³ LATA: **660**
1.2 NPA: **801** OCN:⁴**9636** Parent Company's
OCN(s) **9636**

Switching Identification (Switching Entity/POI)

⁵**LEHIUTMADS0**

Locality/City/Wire Center:

Rate Center:⁶**LEHI**

Homing Tandem Operating Co.⁷:**9636**

Tandem Homing
CLLI^{TM8}: **PROVUTMA1GT**

1.3 Dates

Date of Application: **12/18/2018**

Requested Effective

Date:^{9,10}

02/22/2019

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment Yes _____ No **X**

Expedite Documentation must be provided if "Request Expedite" = Yes
Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): **Incumbent Local Exchange Carrier (ILEC)**

b) Type of service (e.g., Cellular - Type 2): **Wireline**

c) Code Assignment Preference (Optional) **No preference on code, but can't use blocks 0, 1 or 9 due to internal dialing restrictions. 801-xxx-2**

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐
Tandem Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservations

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application¹⁴.

Rita Schmitz

Signature of Code Applicant

Senior Analyst

Title

12/18/2018

Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language® Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™

Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Tracking Number: **801-LEHI-UT-1134156**Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**Full NXX: Pool
Replenishment**Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **QWEST CORPORATION**Headquarters Address: **100 CenturyLink Dr**City: **Monroe** State: **LA** ZIP: **71203**Contact Name: **Rita Schmitz**Contact Address: **333 N Front Street**City: **La Crosse** State: **WI** ZIP: **54601**Phone: **608-796-5600**

Fax:

E-mail: **Rita.Schmitz@CenturyLink.com**Pooling Administrator:ⁱⁱContact Name: **Margaret Harrell-Simington**Contact Address: **1800 Sutter Street, Suite 780**City: **Concord** State: **CA** ZIP: **94520**Phone: **925-363-8747** Fax: **925-363-8747**E-mail: **mharrell-simington@somos.com**

1.2 General Information:

Check one : No LRN needed **X** LRN neededⁱⁱⁱ: _____

NPA: 801 LATA: 660 OCN^{iv}: 9636 Parent Company's OCN 9636

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI^v):
LEHIUTMADS0

Rate Center^{vi}: LEHI

1.3 Dates:

Date of Application^{vii}: 12/18/2018 Requested Effective Date^{viii}: 02/22/2019

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) No
preference on code, but can't use blocks 0, 1 or 9 due to internal dialing
restrictions. 801-xxx-2
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if
any _____
- e) If requesting a code for LRN purposes, indicate which block(s) you will be
keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in **red** and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

☐ OCN: Intra-company^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____
- d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rita Schmitz

Senior Analyst

12/18/2018

Signature of Block Applicant Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectivTM) LERGTM Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service

provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA CO Code application will also need to be submitted to the PA.

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the switch /POI.

^{vi}Rate Center name must be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block (s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Common Language[®] and Telcordia[®] are registered trademarks and CLLI[™], LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 801-LEHI-UT-1134156

Date of Application: 12/18/2018 Effective Date: _____

Date of Receipt: 12/18/2018 Date of Response: 12/18/2018

Service Provider Name: QWEST CORPORATION

(LERGTM Routing Guide¹) OCN: 9636

Parent Company OCN: 9636

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-363-8747

Signature of Pooling Administrator

Margaret Harrell-Simington Fax: 925-363-8747

Name (print)

Email: mharrell-simington@somos.com

 NPA-NXX or
NPA-NXX-X : _____

Block Assigned: _____

Block Reserved : _____

Block Reservation
Expiration Date : _____

Block/Code
Modified : _____

Block/Code
Disconnected : _____

Block Contaminated (Yes or No): _____

If yes, enter the number of TNs
contaminated (1-1000): _____

LEHIUTMADS0

Switch Identification (Switching/POI)²:

Rate Center:

LEHI

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ Telcordia[®] is a registered trademark and LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language[®] Location Code (CLLI[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.