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Qwest
UTAH PUBLIC
SERVICE COMMISSION

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March 17, 2009

Julie Orchard
Secretary
Public Service Commission of Utah
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Dear Ms. Orchard:

By this letter Qwest is requesting 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, which would allow PA/NeuStar, the Number Pooling Administrator, to provide a full NXX for a Qwest customer in the Utah 385 Salt Lake Rate Center.

The request is for a full NXX (10,000 telephone numbers) in the 385 NPA, Salt Lake Rate Center, to meet the specific needs of a customer in the community. The customer is requesting the 385-646 NXX as they currently have numbers in the 801-646 NXX and by only having to change the area code the customer will be able to use their existing dialing plan. Qwest is requesting that authorization be granted so that NeuStar can open and assign the requested NXX to Qwest for the customer. The customer intends to return their existing pool of 1,500 numbers to Qwest when the new numbers are working.

In order to satisfy the customer's request, Qwest submitted a request for the numbers to PA/NeuStar on March 12, 2009, which was immediately denied based on Qwest's Months to Exhaust (MTE) and Utilization Rate. In order for the request to be approved, Qwest will require a waiver of the current MTE and Utilization threshold for new numbering requests. The original customer request has been provided with this letter as a confidential attachment.

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, paras. 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 Paras. 61,66)

Qwest respectfully requests that the Commission approve the request for a waiver of Months to Exhaust threshold and Utilization Rate requirements and direct PA/NeuStar to open and assign the requested NXX in the Utah 385 Salt Lake Rate Center to allow Qwest to meet this specific customer request for a full NXX (10,000 numbers).

The directive can be mailed or faxed directly to:

Diane Calhoun
PA Code Administrator
NeuStar, Inc.
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7656
Fax: 925-363-7655
Email: diane.calhoun@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact me at 303-383-6550. I would appreciate being copied on any correspondence with PA/NeuStar.

Respectfully submitted,



Kevin D. Manwarren

CC: sbenven@utah.gov, Utah Division of Public Utilities

Attachment