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June 7, 2012

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 (CenturyLink) respectfully requests 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. This waiver will allow PA/Neustar, the Number Pooling Administrator, to provide four blocks of 1,000 sequential numbers in the 385 area code for a CenturyLink customer located in the Lehi exchange.

The request is for four blocks of 1,000 sequential numbers in the 385 NPA, Lehi Rate Center, to meet the specific needs of a customer in the community. CenturyLink is requesting that authorization be granted so that Neustar can assign the requested blocks to CenturyLink for the customer, which will require a new 385 NXX be opened in the Lehi Rate Center.

In order to satisfy the customer's request, CenturyLink submitted a request for the numbers to PA/Neustar on June 4, 2012, which was denied based on the availability of blocks in the Industry Pool inventory. Although CenturyLink met the FCC requirements for Utilization and Months to Exhaust, the available blocks in the Industry Pool Inventory do not satisfy the customer's requested requirement for an NXX Code ending in 5; 385-NX5. In order for the request to be approved, CenturyLink will require a waiver approval by the Utah Public Service Commission to override the Neustar denial of resources. A copy of the original customer request has been provided with this letter as a confidential attachment. Also attached are other documents supporting the waiver request.

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)

CenturyLink respectfully requests that the Commission approve the request for this waiver and direct PA/Neustar to assign the requested blocks by opening a new NXX code in the Utah 385 Lehi Rate Center to allow CenturyLink to meet this specific customer request for four new blocks (4,000 numbers).

The directive can be mailed or faxed directly to:

Kevin Gatchell
PA Code Administrator
Neustar, Inc.
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-8742
Fax: 925-363-7692
Email: Kevin.gatchell@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. I would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,

CC: Shauna Benvengnu-Springer, Utah Division of Public Utilities

Attachment