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January 13, 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 LEHIUTMADS0 within the Lehi Rate Center. This waiver will allow PA/Neustar, the Number Pool Administrator, to provide one block of 1,000 sequential numbers (1,000 numbers) in the 801 NPA in the Lehi Rate Center necessary for CenturyLink to meet the specific customer request.

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 a document to the PA/Neustar and the request was denied on January 8, 2016 because CenturyLink does not meet the utilization requirements and because the months-to-exhaust was too high.¹ 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. A copy of the customer request has been provided with this letter as a confidential attachment.

¹ TBPAG Attachment 1 – Thousands-Block Application Form – Part 1A; Confidential Appendix 3 – Months To Exhaust and Utilization Certification Work Sheet; Attachment 3– Pooling Administrator Denial.

January 13, 2016

Page 2

CenturyLink respectfully requests that the Commission approve the request for this waiver and direct PA/Neustar to assign the requested one block of 1,000 sequential numbers in the 801 NPA, 455 NXX, in the 2, 3, 7 or 8 thousand blocks in the Lehi Rate Center to be used in the LEHIUTMADS0 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