

**Qwest**

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**Ron L. Trullinger**

Manager  
Oregon Regulatory

February 10, 2006

Ms. Vikie Bailey-Goggins  
Oregon Public Utility  
PO Box 2148  
Salem Oregon 97308-2148

Dear Ms. Vikie Bailey-Goggins:

Qwest Corporation (Qwest) respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Qwest's Bend rate center.

Qwest is requesting from Neustar / PA, the Oregon number pooling administrator, to open 1,000 sequential numbers out of the BENDOR24DS0 switch. The request is for one block of 1,000 numbers. St. Charles Medical Center in Bend, Oregon needs additional numbers for growth. For customer reasons the thousands block needs to start with 2XXX or 3XXX. The customer prefers the 2XXX block. I have attached the letter from St. Charles Medical Center stating their request. Qwest does not have a block of 300 sequential numbers meeting the customer's request.

On 02/09/06, Qwest submitted a Part 1A and MTE (Months to Exhaust) Worksheet to Neustar/PA via their online system requesting 1 block to satisfy the customers needs. The request was immediately denied. According to FCC requirements, to qualify for additional numbering resources carriers must submit paperwork demonstrating the rate center for which the numbers are requested is at six months or less to exhaust and is at 75% or more utilization. In cases where the 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. The Bend rate center is at 39.2 MTE and 85.8% utilization. Due to the MTE Qwest does not qualify for additional numbers at this time. Qwest also examined the remaining Qwest switches in the Bend rate center and confirmed that we do not have numbers that could be moved to the Bend switch.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as we are requesting. *FCC Docket No. 99-200, Order No. 00-429, ¶186, released December 29, 2000.* The FCC then delegated authority to the State Commissions to grant requests for additional numbering resources in its Third Report And Order on Numbering Resource Optimization:

... and we delegate authority to state commissions to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denied a specific request for numbering resources (footnote omitted)... We also clarify that states may grant request by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

**This request is asking for Commission consideration based upon ¶¶ 61 and 64 of Order No. 01-362 relating to a specific customer request. This need is demonstrated by the customer's request, along with current proof of utilization in the Bend rate center.**

Qwest respectfully requests that the Oregon Public Utility Commission direct Neustar / PA to provide 1,000 sequential numbers provisioned out of the 2XXX blocks. The customer is requesting the numbers as soon as possible.

The directive for the numbers should be mailed to:

Ms. Tara Farquhar  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 925-363-7654  
[Tara.Farquhar@neustar.com](mailto:Tara.Farquhar@neustar.com)

Some of the information provided is confidential by Qwest Corporation and is stamped as such.

Thank you for your consideration in this matter. I would appreciate an expeditious decision relating to this request.

Sincerely,



Attachments