

Qwest

421 Southwest Oak Street Room 810
Portland, Oregon 97204
503-242-5089
Facsimile 503-242-7243

Ron L. Trullinger

Manager
Oregon Regulatory



October 2, 2007

Ms. Vikie Bailey-Goggins
Oregon Public Utility Commission
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 Pendleton rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open a 1K block (1000 sequential numbers) out of the PNTNOR56DS0 switch. Cayuse Technologies of Pendleton, Oregon is building a new call center located at 72632 Coyote Road in Pendleton, and has a requirement for 500 sequential numbers. These new numbers are needed for the new call center. I have attached the customer letter dated September 10, 2007, stating their request.

On 10/01/07, Qwest submitted a Part 1A and MTE (Months to Exhaust) Worksheet to NeuStar/PA via their online system requesting numbering resources to satisfy the customers needs. The request was immediately denied, based on FCC utilization criteria. 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 Pendleton rate center is at 289.7 MTE and 67.6% utilization. Due to the MTE and utilization Qwest does not qualify for additional numbers at this time.

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 Eugene rate center.

Qwest respectfully requests that the Oregon Public Utility Commission direct NeuStar / PA to provide a 1K block of 1000 sequential numbers provisioned out of the Pendleton, Oregon switch. The new numbers can not be in the 0XXX, 3XXX, 8XXX or 9XXX blocks. Currently, there are 1K blocks in the PA's pool inventory that will satisfy this request. Because there are available 1K blocks available from the PA, this request will not require authorization to open a new NXX code in the Pendleton rate center.

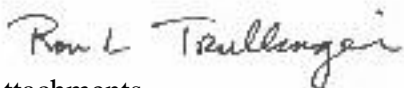
The directive for the numbers should be mailed to the Pooling Administrator:

Ms. Diane Mueller
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7656
diane.mueller@neustar.biz

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. The customer is requesting the numbers as soon as possible to support their new call center.

Sincerely,



Attachments