

Qwest

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Ron L. Trullinger

Manager
Oregon Regulatory



May 30, 2008

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 Roseburg rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open six blocks for the RSBGOR57DS0 switch. Mercy Medical Center located in Roseburg, Oregon has completed its major building expansion. Due to dialing plans at the medical center the customer is requesting that the six blocks come from an NXX that ends in one through six (NX1-NX6). The customer will be using 3,900 numbers out of the 6,000 requested and has specific NXX-X numbers that will work with their dialing plans. The customer will also be returning approximately 4,400 numbers back to Qwest once they have established their new calling plan. I have attached the customer letter dated March 31, 2008 stating their request.

On 05/29/08, Qwest submitted a Part 1/1A 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 Roseburg rate center is at 18.57 MTE and 69.77% utilization. Due to the MTE and utilization criteria 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 Roseburg rate center.

Qwest respectfully requests that the Oregon Public Utility Commission direct NeuStar / PA to provide six sequential thousands blocks, specifically the one (1) thru six (6) blocks (541-NXX-1000 thru 541-NXX-6999) from an NXX with the last digit of one (1) thru six (6) (541-NX1-6) provisioned out of the Roseburg, Oregon switch.

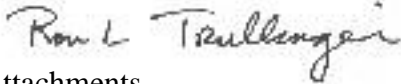
The directive for the numbers should be mailed to the Pooling Administrator:

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 dialing plans.

Sincerely,


Attachments