

Qwest

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

Ron L. Trullinger

Manager
Oregon Regulatory



February 24, 2009

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 Portland rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open two blocks in the PTLDOR12DS0 switch. The Oregon Army National Guard is in the process of building a new building in Clackamas, Oregon, These new numbers will be assigned to a PRI they have installed at a temporary site to handle displaced people from Camp Withycombe until the building is completed. The Oregon Guard is requesting numbers out of the 5XXX and 6XXX blocks to be able to utilize a 4 digit dial system between PBX's. The customer will be returning 650 telephone numbers in the fall of 2011. Due to the Oregon Guard's internal numbering the blocks can not begin with 1, 0 or 9. I have attached the customer letter dated February 11, 2009 stating their request.

On 2/24/2009, 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 Portland rate center is at 1,096 MTE and 68.59 % 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 Portland rate center.

Qwest respectfully requests that the Oregon Public Utility Commission direct NeuStar / PA to provide two thousands block, specifically from 503-208- 5XXX, and 503-209-6XXX provisioned out of the PTLDOR12DS0 switch. Qwest does not currently have the range of numbers 5000 thru 6999 available in its inventory. The Oregon National Guard is requesting these numbers as soon as possible.

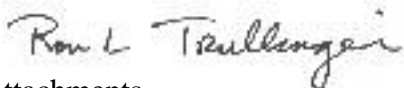
The directive for the numbers should be mailed to the Pooling Administrator:

Ms. Diane Calhoun
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7656
diane.calhoun@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.

Sincerely,



Attachments