



June 8, 2017

Via e-Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088
Puc.filingcenter@or.us

Re: Eugene Rate Center Numbering Waiver Request

By this letter Qwest Corporation d/b/a CenturyLink QC ("CenturyLink") is requesting a waiver of the utilization requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow PA/Neustar, the Number Pooling Administrator, to assign 4 blocks of numbers that meet the specific needs of a customer. The customer specific information is provided in Confidential Attachment A. This document is confidential due to propriety network information, and is appropriately marked and printed on yellow paper.

In our effort to satisfy this request, CenturyLink submitted a request to PA/Neustar on June 7, 2017 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment B, also appropriately marked and printed on yellow paper. Confidential Attachments A and B are sealed in a separate envelope and are being sent to the Commission via regular U.S. Mail. In order for the request to be approved, CenturyLink will require a waiver of the current usage threshold for new numbering requests.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request for a large block of numbers or to establish an LRN. The waiver process is specifically addressed in the FCC Third Report and

1600 7th Avenue, 15th Flr.
Seattle, WA 98191
Tel: 206.345.6224
Fax: 206.345.1977
Phil.grate@centurylink.com

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Order ("Order") as the "safety valve" process (See FCC 01-362, ¶¶ 57-66), which went into effect on March 14, 2002. The order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See ¶¶ 61, 66).

CenturyLink respectfully requests that the Commission approve the request for a waiver of months to exhaust and Rate Center Utilization requirements, and direct PA/Neustar to assign four blocks out of the existing 458 NPA Eugene Rate Center to accommodate the customer's request.

All directives can be emailed, faxed or mailed directly to:

Kevin Gatchell
PA Code Administrator
Neustar, Inc.
1800 Sutter Street
Concord, CA 94520
Phone 925-363-8742
Fax: 925-363-7692
Email: Kevin.gatchell@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request please contact Rita Schmitz at (608) 796-5600 or rita.schmitz@centurylink.com. We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,



Phil Grate
State Regulatory Affairs Director

Attachments (Redacted Attachment A and Attachment B)

1600 7th Avenue, 15th Flr.
Seattle, WA 98191
Tel: 206.345.6224
Fax: 206.345.1977
Phil.grate@centurylink.com

[REDACTED]

[REDACTED] phone upgrade

#1- Date of Request: May 22, 2017

#2- [REDACTED] Eugene Oregon 97401 and the [REDACTED] will be moving from the [REDACTED] phone system to our [REDACTED] phone system.

Currently the [REDACTED] office codes and [REDACTED] that do not fit into our current dial plan.

#3- [REDACTED] is requesting new [REDACTED] for the upgrade of our Phone system.

Currently [REDACTED] and will return a majority of those DID's once we move to the new phone system. Projected time frame of [REDACTED] back to Century link [REDACTED]

#4- We would like to have the TN's available by July 1st to start planning and programming.

#5- [REDACTED] is requesting specific office codes that will need to fit in our current dial plan.

[REDACTED]

And the in extension ranges need to be in the [REDACTED] blocks.

#6- Due to use of 4 digit internal dialing we are unable to use any extensions that leads with 0 or 9.

0 is reserved for the operator and 9 is access to the [REDACTED]

Sincerely,


[REDACTED]

Tracking Number: [REDACTED]Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**Individual Block
Request**Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **QWEST CORPORATION**Headquarters Address: **100 CenturyLink Dr**City: **Monroe** State: **LA** ZIP: **71203**Contact Name: **Rita Schmitz**Contact Address: **333 N Front Street**City: **La Crosse** State: **WI** ZIP: **54601**Phone: **608-796-5600**  Fax:E-mail: **Rita.Schmitz@CenturyLink.com**Pooling Administrator:ⁱⁱContact Name: **Kevin Gatchell**Contact Address: **1800 Sutter St**City: **Concord** State: **CA** ZIP: **94520**Phone: **925-363-8742**  Fax: **925-363-7692** E-mail: **kevin.gatchell@neustar.biz**

1.2 General Information:

REDACTED
Attachment B

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: _____ LATA: _____ OCN^{iv}: _____ _____

Number of Thousands-Blocks Requested : _____

Switch Identification (Switching Entity/POI^v):

Rate Center^{vi}: _____

1.3 Dates:

Date of Application^{vii}:
06/07/2017

Requested Effective Date^{viii}:
07/08/2017

Requested Expedited Treatment? (See Section 8.6) Yes No _____

Expedited Explanation:

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : _____
(LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : _____

c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes If Yes, attach months to exhaust worksheet

REDACTED
Attachment B

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

- OCN: Intra-company^{ix} Switching Id Part 1B
 OCN: Inter-company^x Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ No _____
 b) If Yes how many TNs are NOT available for assignment : _____
 c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____
 —
 d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rita Schmitz

Process Analyst II

06/07/2017

Signature of Block Applicant Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local

REDACTED
Attachment B

Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv™ Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.



The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA CO Code application will also need to be submitted to the PA.

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020 ) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700 .

^vThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ Code of the switch /POI.

^{vi}Rate Center name must be a tariffed Rate Center.

REDACTED
Attachment B

- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block (s) is/will be active in the PSTN prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Common Language[®] and Telcordia[®] are registered trademarks and CLLI[™], LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : [Redacted]

Date of Application: 06/07/2017 Effective Date: _____

Date of Receipt: 06/07/2017 Date of Response: 06/07/2017

Service Provider Name: [Redacted]

(LERGTM Routing Guide¹) OCN: [Redacted]


Parent Company OCN: [Redacted]

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-363-8742 

Signature of Pooling Administrator

Kevin Gatchell Fax: 925-363-7692 

Name (print)

Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-NXX-X : _____

Block Assigned: _____

Block Reserved : _____

Block Reservation Expiration Date : _____

Block/Code Modified : _____

Block/Code Disconnected : _____

Block Contaminated (Yes or No): _____

If yes, enter the number of TNs contaminated (1-1000): _____

REDACTED
Attachment B

Switch Identification (Switching/POI)²:
Rate Center:

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ Telcordia[®] is a registered trademark and LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language[®] Location Code (CLLI[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.