

Qwest

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Ron L. Trullinger

Manager
Oregon Regulatory



August 12, 2005

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 Salem rate center.

Qwest is requesting from Neustar / PA, the Oregon number pooling administrator, to open 10,000 numbers out of the SALMOR58DS0 switch. The request is for 10,000 sequential numbers, 10 blocks, all in the same NXX. Pending availability, the customer has requested the 503-934. The State of Oregon has a need for additional numbers due to them beginning a special project to implement DID dialing and billing for all telephone devices. Qwest examined the SALMOR58DS0 switch to confirm that it did not have the numbers meeting the customer's criteria. Next, Qwest examined the remaining Qwest switches in the Salem rate center and confirmed we do not have numbers meeting the customer's criteria.

On 08/9/05, Qwest submitted a Part 1A and MTE (Months to Exhaust) Worksheet to Neustar/PA via their online system requesting 10 block(s) to satisfy the customer. 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 Salem rate center is at 36 MTE and 76.39% 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 Salem rate center.

Qwest respectfully request that the Oregon Public Utility Commission direct Neustar / PA to provide 10,000 numbers provisioned out of the SALMOR58DS0 switch. Qwest would also like to request Staff to contact NeuStar to reserve 503-934 pending Commission approval.

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

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