

**Qwest**

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

**Ron L. Trullinger**

Manager  
Oregon Regulatory



January 26, 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 Madras rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open one block in the MDRSOR52DS0 switch. The Mountain View Hospital located in Madras, Oregon is in the process of updating their telecommunications systems and coordinating their number plans with St. Charles Hospital in Bend, Oregon. Due to dialing plans the customer is requesting 200 new sequential numbers within the same prefix. The number ranges of 4XXX, and 5XXX are preferred by the customer. Due to the hospital's internal numbering the blocks can not begin with 1, 0 or 9. I have attached the customer letter dated December 31, 2008 stating their request.

On 10/28/08, 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 Madras rate center is at 336 MTE and 42 % 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 Madras rate center.**

Qwest respectfully requests that the Oregon Public Utility Commission direct NeuStar / PA to provide one thousands block, specifically from any NXX beginning with 4XXX, or 5XXX provisioned out of the Madras, Oregon switch. Qwest does not currently have 200 consecutive numbers in the Madras rate center.

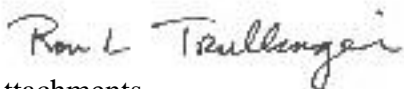
The directive for the numbers should be mailed to the Pooling Administrator:

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