



August 2, 2016

Oregon Public Utility Commission  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

Re: Prineville 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 open a code and assign 1 block 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 proprietary network information, and is appropriately marked, printed on yellow paper and sealed in a separate envelope.

In our effort to satisfy this request, CenturyLink submitted a request to PA/Neustar on July 25, 2016 for additional numbering resources. That application and the subsequent denial have been provided as Confidential Attachment A. 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 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

1600 7<sup>th</sup> Avenue, 15<sup>th</sup> Flr.  
Seattle, WA 98191  
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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 one Block from a new Code in the 541 NPA Prineville Rate Center to accommodate the customer's request to establish an LRN.

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](mailto: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](mailto:rita.schmitz@centurylink.com). We would appreciate being copied on any correspondence with PA/Neustar.

Sincerely,



Phil Grate  
State Regulatory Affairs Director

Enclosure

1600 7<sup>th</sup> Avenue, 15<sup>th</sup> Flr.  
Seattle, WA 98191  
Tel: 206.345.6224  
Fax: 206.345.1977  
[Phil.grate@centurylink.com](mailto:Phil.grate@centurylink.com)

Central Office Code Assignment Guidelines (COAG)  
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking Number: [REDACTED]

**Full NXX: LRN**

Type of Application:  New   
Change<sup>1</sup>  Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **QWEST CORPORATION**

Headquarters Address: **100 CenturyLink Dr**

City, State, Zip: **Monroe, LA, 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**

Code Administrator:<sup>2</sup>

Name: **Michael Ortega**

Address: **46000 Center Oak Plaza**

City: **Sterling** State: **VA** ZIP: **20166**

Phone: **571-434-5348** Fax : **571-434-5502**

1.2 NPA: [REDACTED] NXX:<sup>3</sup> [REDACTED] LATA: [REDACTED] OCN:<sup>4</sup> [REDACTED]

Parent Company's OCN(s) [REDACTED]

Switching Identification (Switching Entity/POI) <sup>5</sup> [REDACTED]

Locality/City/Wire Center: [REDACTED] Rate Center: [REDACTED]

Homing Tandem Operating Co.<sup>7</sup> [REDACTED] Tandem Homing CLLI<sup>TM8</sup> [REDACTED]

1.3 Dates

Date of Application: 07/25/2016

Requested Effective  
Date:<sup>9,10</sup> \_\_\_\_\_  
09/29/2016

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.

Request Expedited Treatment Yes X No \_\_\_\_\_

Expedite Documentation must be [REDACTED]  
[REDACTED]  
[REDACTED]

1.4 a) [REDACTED] (LEC, IC, CMRS, Other): \_\_\_\_\_

b) Type of service (e.g., Cellular - Type 2): \_\_\_\_\_

c) Code Assignment Preference (Optional) \_\_\_\_\_

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

OCN-Intra-company<sup>11</sup>  Switching Id  Rate Center  Tandem  
Homing CLLI

OCN-Inter-company<sup>12</sup>  Effective Date  LATA  Extend  
Reservations

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: <sup>13</sup>  Yes  No

1.6 NPA Jeopardy Criteria Apply:  Yes  No

1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_

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1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

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I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application<sup>14</sup>.

**Rita Schmitz**

Signature of Code Applicant

**Process Analyst II**

Title



**07/25/2016**

Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup>The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup>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 may contact NECA (800-228-8597 ) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700 .

<sup>5</sup>This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language® Location Code (CLLI™ Code) of the applicant's switch or POI. 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.

<sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup>Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup>Select if you are the current Code Holder

<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.




<sup>14</sup>An incomplete form may result in delays in processing this request.

Tracking Number: XXXXXXXXXXXXXXXXXXXXThousands-Block Application Form - Part 1A  
Revised: January 4, 2016**Full NXX: LRN**Type of Application:  New  Change <sup>i</sup>  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:<sup>ii</sup>Contact 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:

Check one : No LRN needed \_\_\_\_\_ LRN needed<sup>iii</sup>:   **X**

NPA: [REDACTED] LATA: [REDACTED] OCN<sup>iv</sup>: [REDACTED] [REDACTED]

Number of Thousands-Blocks Requested : [REDACTED]

Switch Identification (Switching Entity/POI<sup>v</sup>):  
[REDACTED]

Rate Center<sup>vi</sup>: [REDACTED]

1.3 Dates:

Date of Application<sup>vii</sup>:  
07/25/2016

Requested Effective Date<sup>viii</sup>:  
09/29/2016

Requested Expedited Treatment? (See Section 8.6) Yes  No

Expedited Explanation: [REDACTED]

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 : [REDACTED]  
(LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : [REDACTED]

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) [REDACTED]

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



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<sup>ix</sup>  Switching Id  Part 1B  
 OCN: Inter-company<sup>x</sup>  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**

**07/25/2016**

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

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<sup>xi</sup>. 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:

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup>A CO Code application will also need to be submitted to the PA.

<sup>iv</sup>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 .

<sup>v</sup>This 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.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

- <sup>vii</sup> 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.
- <sup>viii</sup> 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).
- <sup>ix</sup> Select if you are the current Block Holder.
- <sup>x</sup> Select if you are not the current Block Holder
- <sup>xi</sup> Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.



