

Qwest

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Ron L. Trullinger

Manager
Oregon Regulatory



September 14, 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 Bend rate center.

Qwest is requesting from Neustar / PA, the Oregon number pooling administrator, to open 1,000 numbers out of the BENDOR24DS0 switch. The request is for 1 block of 1,000 numbers to be able to accommodate two customer requests for 200 numbers each in the 4XXX block. The 4XXX is being requested to satisfy both customers' internal dialing plans. Bend Memorial Clinic and Umpqua Bank in Bend are both of the requesting customers. I have attached letters from each of them stating their request. Please note that we will also be able to use an additional 200 numbers out of the requested 1,000 numbers for a request that we have just received from Oregon State University. Qwest examined the BENDOR24DS0 switch to confirm that it did not have the numbers meeting the customer's criteria. Next, Qwest examined the remaining Qwest switches in the Bend rate center and confirmed we do not have numbers meeting the customer's criteria.

On 08/27/05, Qwest submitted a Part 1A and MTE (Months to Exhaust) Worksheet to Neustar/PA via their online system requesting 1 block to satisfy the customers. 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 Bend rate center is at 27.5 MTE and 85.7% utilization. Due to the MTE Qwest does not qualify for additional numbers at this time.

Neustar/PA currently has no inventory blocks in the Bend Rate Center. Neustar/PA will need to open a new code to replenish the pool and then assign Qwest the 4XXX block.

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 Bend rate center.

Qwest respectfully request that the Oregon Public Utility Commission direct Neustar / PA to provide 1,000 numbers provisioned out of the BENDOR24DS0 switch.

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