

Qwest

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

Ron L. Trullinger

Manager
Oregon Regulatory



January 19, 2007

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 Florence rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open 1,000 sequential numbers out of the FLRNOR53DS0 switch. The request is for one block of 1,000 numbers. Peace Harbor Hospital in Florence, Oregon is expanding their existing facilities which will require the creation of 300 sequential DID numbers. I have attached the letter from Peace Harbor Hospital stating their request.

On 01/18/07, Qwest submitted a Part 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. 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 Florence rate center is at 155.7 MTE and 74.6% 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 Redmond rate center.

Qwest respectfully requests that the Oregon Public Utility Commission direct Neustar / PA to provide 1,000 DID numbers. Qwest previously donated 541-902-6XXX to the NANPA pool inventory. This block was donated with working numbers (ported back) but would work for this customer's requirements. Qwest is requesting that the Oregon Public Utility Commission contact NeuStar PA to reserve the 541-902-6XXX block for this request, pending their final regulatory approval.

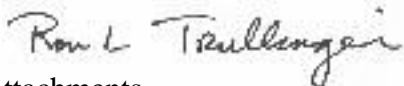
The directive for the numbers should be mailed to:

Ms. Diane Mueller
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7656
diane.mueller@neustar.com

Some of the information provided is confidential by Qwest Corporation and is stamped as such.

The customer has stated in their letter that they are unable to supply service to staff and patients until the new numbers have been installed and are requesting the waiver request be expedited. Thank you for your consideration in this matter.

Sincerely,



Attachments