

**Qwest**

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**Ron L. Trullinger**

Manager  
Oregon Regulatory



October 29, 2008

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 Eugene rate center.

Qwest is requesting from NeuStar / PA, the Oregon number pooling administrator, to open six blocks in the EUGNOR53DS1 switch. The Eugene School District located in Eugene, Oregon is in the process of updating their telecommunications systems. The district is installing private fiber to all of its buildings and upgrading their telephone systems to allow the use of VOIP technology. All sites will have DID numbers and voice mail. Due to dialing plans the customer is requesting 6,000 new sequential numbers. The numbers can be from any prefix but need to be in the number ranges of 3XXX, 4XXX, 5XXX, 6XXX, 7XXX, and 8XXX. Due to the school district's internal numbering the blocks can not begin with 1, 0 or 9. The school district will be returning to Qwest 200 numbers out of the 541-334 prefix and 1,657 numbers out of the 541-687 prefix after they have completed their project. I have attached the customer letter dated September 26, 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 Eugene rate center is at 77.661 MTE and 72.16 % 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 Eugene rate center.**

Qwest respectfully requests that the Oregon Public Utility Commission direct NeuStar / PA to provide six thousands blocks, specifically from any NXX beginning with 3XXX, 4XXX, 5XXX, 6XXX, 7XXX and 8XXX provisioned out of the Eugene, Oregon switch.

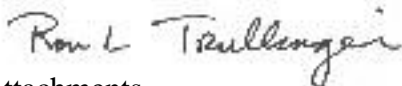
The directive for the numbers should be mailed to the Pooling Administrator:

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