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UTILITIES COMMISSION

May 27, 2011

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

RE: Docket No. CEN-T-11-02

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of the **Petition of CenturyLink for Waiver of FCC Threshold Requirements for Numbering Resources for Grandview Idaho.**

CenturyTel Gem State, Inc. dba CenturyLink of Idaho ("CenturyLink") requests that the Commission direct NeuStar to release certain numbering resources to CenturyLink for use by a customer whose identify is confidential. CenturyLink's Confidential Attachments A and B, which are filed under separate cover and with an Attorney's Certificate identify the customer and contain other confidential information.

CenturyLink is hopeful that the Staff and Commisison will be able to review this Petition without delay and that decision can be reached that will allow CenturyLink's customer to gain access to the numbering resources it is seeking.

If you have any questions, please contact me. Thank you for your cooperation in this matter.

Very truly yours,


Mary S. Hobson

Enclosure

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Attorneys for CenturyLink

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

<p>PETITION OF CENTURYLINK FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR GRANDVIEW IDAHO</p>	<p>Case No. CEN-T-11-02</p>
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CENTURYLINK'S REQUEST FOR WAIVER

CenturyTel Gem State, Inc. dba CenturyLink of Idaho ("CenturyLink") by and through its undersigned attorneys, and pursuant to IDAPA 31.01.01.256, files the following Request for Waiver of certain FCC threshold requirements for the release of numbering resources. CenturyLink petitions the Commission for review of the denial by the administrator of the North American Numbering Plan, NeuStar, of CenturyLink's application for use of central office code numbering resources in area code 208.

Specifically, CenturyLink has requested that NeuStar provide a 1000 number block in the Grandview, Idaho wire center to satisfy the request of a CenturyLink customer for additional numbers to meet the customer's business needs. CenturyLink's customer needs these numbers as soon as possible, and will begin using them as soon as this Request for Waiver is granted and the numbers are released for service. These numbers will be added to existing inventory to accommodate expansion and growth of the customer's business. The customer's request is attached to this Request for Waiver as Confidential Attachment A.

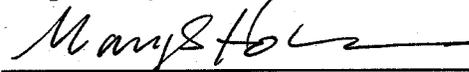
CenturyLink reviewed the customer's request and determined that it did not have the requested numbering resources available within the Grandview rate center. On May 10, 2011, CenturyLink submitted a Thousand Block Application form-Part 1 to NeuStar. *See Confidential Attachment B.* The request was immediately denied due to the months to exhaust (MTE) and/or usage threshold calculation for the Grandview, Idaho rate center. *See Attachment C.* NeuStar's denial triggers this waiver of the utilization threshold requirements outlined in the FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200.

The FCC permits a waiver of the kind requested here when there is a demonstrated need, such as a specific customer request for numbers. 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 (Mar. 14, 2002).* The Order delegates the authority to hear requests for waivers to the state commissioners and recommends that state commissions act expeditiously. *See Id., ¶¶ 61, 66.*

CenturyLink respectfully requests that the Commission approve this Request for Waiver of the threshold requirements and direct NeuStar to provide a block of 1000 numbers in the Grandview Idaho rate center in the 208 NPA as outlined above, to meet CenturyLink's customer's request.

Submitted this 27th day of May, 2011.

Respectfully submitted,



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Lisa A. Anderl
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Attorneys for CenturyLink

**CONFIDENTIAL ATTACHMENT A
FILED UNDER SEPARATE COVER**

**CONFIDENTIAL ATTACHMENT B
FILED UNDER SEPARATE COVER**

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPA Part 3

Tracking Number : 208-GRAND VIEW-
ID-444659

Date of Application: 05/18/2011 Effective Date: _____
Date of Receipt: 05/18/2011 Date of Response: 05/18/2011

Service Provider Name: CENTURYTEL GEM STATE, INC.-ID DBA
CENTURLINK-ID
(Telcordia™ LERG™
Routing Guide) OCN: 4437

NPAC SOA SPID: _____

Pooling Administrator Contact Information:

Zack Jones Phone: 925-363-7653

Signature of Pooling Administrator

Zack Jones Fax: 925-363-7686

Name (print)

Email: zack.jones@neustar.biz

NPA-NXX or NPA-
NXX-X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code Modified : _____
Block/Code
Disconnected : _____

Block Contaminated(Yes or No) :

If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹

GRVWIDXCDS0

Rate Center:

GRAND VIEW

Rate Center Sub Zone: _____

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)