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August 16, 2006

QWE-T-06-16

**VIA HAND DELIVERY**

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

**RE: In the Matter of the Petition of Qwest Corporation for Waiver of FCC  
Threshold Requirements for Numbering Resources for Boise, Idaho**

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of **QWEST CORPORATION'S REQUEST for WAIVER**. Qwest requests the Idaho Public Utilities Commission direct NeuStar to release a new NXX in the Boise area to meet the needs of customer whose identity is confidential. The identity of the customer is revealed in Qwest's Confidential Attachment A, which is filed under separate cover and with an attorney's certificate.

Commission attorney, Weldon Stutzman, was previously notified that this request was being prepared. It is Qwest's hope that the Staff and Commission will be able to review this without delay and that a decision can be reached at the upcoming decision meeting, which is scheduled for later this month.

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

Very truly yours,

  
Mary S. Hobson

Enclosures

cc: Service List

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Attorneys for Qwest Corporation

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<p><b>IN THE MATTER OF THE PETITION OF QWEST CORPORATION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR BOISE, IDAHO</b></p> <p><b>mhobson      Page 1 8/16/2006</b></p>	<p><b>Case No. QWE-T-06-<u>16</u></b></p>
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**QWEST CORPORATION'S REQUEST FOR WAIVER**

Qwest Corporation (Qwest), 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. Qwest petitions the Commission for review of the denial by the administrator of the North American Numbering Plan, NeuStar, of Qwest's application for use of central office code numbering resources in area code 208.

Specifically, Qwest requests 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. Such waiver would allow NeuStar, to provide 10,000 numbers to a Qwest customer. The 10,000 numbers in question are in the 208 NPA in the Boise Rate Center, and are required to meet a specific customer need in the Boise community. The customer requires 10 sequential blocks in any NXX ending in any of the following digits: 1, 2, 4, or 5. Qwest's customer will need these numbers starting in November, 2006, and will begin planning for their use as soon as this Request for Waiver is granted and the numbers are released. These numbers will be added to existing inventory to accommodate expansion and growth of new services. The customer's request is attached to this Request for Waiver as confidential Attachment A.

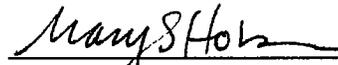
On August 8, 2006 Qwest submitted the customer's request for numbering resources to NeuStar. The request was immediately denied due to the "months to exhaust" calculation for the Boise Rate Center. The waiver request here is of this "months to exhaust" usage threshold for numbering requests.

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.

Qwest respectfully requests that the Commission approve this Request for Waiver of the “months to exhaust” threshold requirements and direct Neustar to provide a new NXX code (i.e., ten blocks of 1000 numbers) in the Boise Rate Center in the 208 NPA as outlined above, to meet Qwest’s customer’s request.

Submitted this 17<sup>th</sup> day of August, 2006.

Respectfully submitted,



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Attorneys for Qwest Corporation

**QWEST CONFIDENTIAL ATTACHMENT "A"  
FILED UNDER SEPARATE COVER**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing **REQUEST FOR WAIVER OF QWEST CORPORATION** was served on the 17th day of August, 2006

on the following individuals:

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Idaho Public Utilities Commission  
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