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IDAHO PUBLIC
UTILITIES COMMISSION

August 22, 2007

VIA HAND DELIVERY

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

RE: Docket No. QWE-T-07-06

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of **QWEST CORPORATION'S PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR BOISE, IDAHO**. If you have any questions, please contact me. Thank you for your cooperation in this matter.

Very truly yours,


Mary S. Hobson

Enclosures

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Attorneys for Qwest Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

<p>PETITION OF QWEST CORPORATION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR BOISE, IDAHO</p>	<p>Case No. QWE-T-07-06</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 the authority to provide 10,000 numbers, a full NXX, to Qwest. 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 of numbers in any NXX ending in digit 1 or 2. Qwest'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 new services. Once the new numbers are put into service, the customer plans to return 1,000 of their existing numbers. The customer's request is attached to this Request for Waiver as Confidential Attachment A.

On August 9, 2007 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. *See* Attachment B. The waiver request here is for the "months to exhaust" usage threshold for numbering requests.

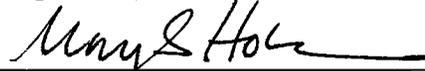
The FCC permits a waiver of the kind requested here when there is a demonstrated need, such as a specific customer request for numbers. The waiver process is specifically addressed in the FCC Third Report and Order ("Order") as the "safety valve" process. *See* FCC 01-362, ¶¶57-66 (Mar. 14, 2002). The 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 22d day of August, 2007.

Respectfully submitted,



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Attorneys for Qwest Corporation

**CONFIDENTIAL ATTACHMENT A
IS FILED UNDER SEPARATE COVER**

Pooling Administration System

 bruce.bennett@qwest.com (SP)

[Sign Out](#)

Request Resources

State IDAHO

NPA 208

Rate Center BOISE

OCN 9636-QWEST CORPORATION

Type of Application Application for a full NXX for a Dedicated Customer

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

 bruce.bennett@qwest.com (SP)

Sign Out

Request Full NXX (Dedicated Customer)

Do you already have a block/code in this rate center? <input checked="" type="radio"/> Yes <input type="radio"/> No
Will all blocks be activated on the same switch? <input checked="" type="radio"/> Yes <input type="radio"/> No
Will there be multiple block effective dates requested? <input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="button" value="Back"/> <input type="button" value="Continue"/> <input type="button" value="Cancel"/>

Pooling Administration System

home icon bruce.bennett@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Thursday, August 9, 2007**

OCN **9636**

Company Name **QWEST CORPORATION**

Rate Center **BOISE**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X
(s)

208-846, 208-853, 208-855, 208-884, 208-887, 208-888, 208-893, 208-895, 208-938, 208-939, 208-288, 208-321, 208-322, 208-323, 208-327, 208-331, 208-332, 208-333, 208-334, 208-336, 208-338, 208-341, 208-342, 208-343, 208-344, 208-345, 208-362, 208-363, 208-364, 208-367, 208-368, 208-373, 208-375, 208-376, 208-377, 208-378, 208-381, 208-383, 208-384, 208-385, 208-386, 208-387, 208-388, 208-393, 208-395, 208-396, 208-422, 208-424, 208-426, 208-429, 208-433, 208-492, 208-658, 208-672, 208-706, 208-822, 208-685-0, 208-685-1, 208-685-2, 208-685-3, 208-685-4, 208-685-5, 208-685-6, 208-685-7, 208-685-8, 208-348-0, 208-348-1, 208-348-2, 208-348-3, 208-348-4, 208-348-5, 208-348-6, 208-348-7, 208-348-8, 208-348-9, 208-286-0, 208-286-7, 208-286-9, 208-389-0, 208-389-1,

Name of Block Applicant **Mr Bruce R Bennett**

Title **Regulatory Manager**

Telephone Number **(303) 707-7013**

Fax Number **(303) 707-9577**

E-Mail **bruce.bennett@qwest.com**

A. Available Numbers * **114063**

B. Assigned Numbers * **475462**

C. Total Numbering Resources * **624000**

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * **0**

List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months² *

Month 1	-463	Month 2	-3736
Month 3	-736	Month 4	-514
Month 5	448	Month 6	-760

F. Forecast - Next 12 months³ *

ATTACHMENT B

Month 1	9040	Month 2	-960
Month 3	-960	Month 4	-960
Month 5	-960	Month 6	-960
Month 7	-960	Month 8	-960
Month 9	-960	Month 10	-960
Month 11	-960	Month 12	-960

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **706.667**

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	114063	161.410

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **76.196**

Explanation

Specific customer request for a full NXX ending in 2 (NX2). Will require ID PUC Safety Valve Waiver approval for a new NXX to be opened.

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Pooling Administration System

 [bruce.bennett@qwest.com](#) (SP)

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Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing **QWEST CORPORATION'S REQUEST FOR WAIVE** was served on the 22^d day of August, 2007 on the following individuals:

Jean D. Jewell
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83702
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Hand Delivery
 U. S. Mail
 Overnight Delivery
 Facsimile
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Attorney for Qwest Corporation