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August 5, 2011

VIA HAND DELIVERY

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

RE: Docket No. QWE-T-11-07

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of a **PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR NAMPA, IDAHO** filed by Qwest Corporation dba CenturyLink QC. Confidential Attachment A to the Petition is being filed under separate cover with an Attorney's Certificate.

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 dba CenturyLink QC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

<p>PETITION FOR WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING RESOURCES FOR NAMPA, IDAHO</p>	<p>Case No. QWE-T-11-07</p>
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REQUEST FOR WAIVER FOR ADDITIONAL NUMBERING RESOURCES

Qwest Corporation dba CenturyLink QC (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 1,000 sequential numbers to Qwest.

The 1,000 numbers in question are requested in the 208 NPA in the Nampa Rate Center, and are required to meet a specific customer need in the Nampa community. Qwest's customer requires 1,000 sequential numbers in an NX3 format to be incorporated into an existing dialing plan. Qwest's customer requests that these numbers be made available as soon as possible. The customer will begin using the numbers as soon as the waiver is granted and the numbers are released for service. The numbers will be added to existing inventory to accommodate the customer's expansion of operations. The customer's request is attached hereto as Confidential Attachment A.

On August 2, 2011 Qwest submitted the customer's request for numbering resources to NeuStar. *See* Attachment B. The request was immediately denied due to the "months to exhaust" calculation for the Nampa Rate Center. *See* Attachment C. The waiver requested 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 1,000 sequential numbers in the NX3 in the Nampa Rate Center in the 208 NPA as outlined above, to meet Qwest’s customer’s request.

Submitted this 5th day of August, 2011.

Respectfully submitted,


Mary S. Hobson (ISB. No. 2142)
999 Main. Suite 1103
Boise, ID 83702

Lisa A. Anderl
Associate General Counsel, Qwest
1600 7th Avenue, Room 1506
Seattle, WA 98191

Attorneys for Qwest Corporation dba
CenturyLink QC

Attachment B

Thousands-Block Application Form - Part 1A

Tracking Number: 208-NAMPA-ID-463750
Individual Block Request

Type of Application: **New** **Change** **Disconnect**

GENERAL APPLICATION INFORMATION**1.1 Contact Information:****Block Applicant:**

Company Name: QWEST CORPORATION
Headquarters Address: 1801 California
City, State, Zip: Denver, CO, 80202
Contact Name: Bruce Bennett
Contact Address: 700 W. Mineral, Room MN D18.12
City, State, Zip: Littleton, CO, 80120
Phone: 303-707-7013 **FAX:** 303-707-9577 **E-mail:** bruce.bennett@CenturyLink.com

Pooling Administrator: ii

Contact Name: Zack Jones
Contact Address: 1800 Sutter St
City, State, Zip: Concord, CA, 94520
Phone: 925-363-7653 **FAX:** 925-363-7686
E-mail: zack.jones@neustar.biz

1.2 General Information:

Check one : No LRN needed **LRN needed** **iii** _____

NPA: 208 **LATA:** 652 **OCN: iv** 9636 **Parent Company's OCN** 9600

Number of Thousands-Blocks Requested : 1Switching Identification(Switch Entity/POI) : ^vNMPAIDMADS0

City or Wire Center Name : _____

Rate Center: ^{vi} NAMPA

Rate Center Sub Zone: _____

1.3 Dates:Date of Application: ^{vii} _____08/02/2011Requested Block Effective Date: ^{viii}09/02/2011

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes X No _____

Expedited Explanation:

1.4 Type of Service Provider Requesting the Thousands-Block :a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
_____(LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

OCN:Intra-company ^{ix} Switching Id Part
1B

OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Bruce Bennett**Signature of Block Applicant****Regulatory 08/02/2011
Manager****Title Date****Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider ^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-

6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
 (Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **208-NAMPA-ID-463750**

Date: **08/02/2011** OCN: **9636** Company Name: **QWEST CORPORATION**

Rate Center: **NAMPA**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **208-442, 208-461, 208-463, 208-465, 208-466, 208-467, 208-468**

Name of Block Applicant: **Bruce Bennett** Signature: **Bruce Bennett**

Title: **Regulatory Manager** Telephone No.: **303-707-7013**
 FAX No.: **303-707-9577**

E-mail: **bruce.bennett@CenturyLink.com**

A. Available Numbers: **20141**

B. Assigned Numbers: **40651**

C. Total Numbering Resources: **70000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: **0**

List Excluded Code(s) or Block(s):

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
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E. Growth History - Previous 6 months ³	-95	-191	-239	-172	-258	-242					
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F. Forecast - Next 12 months ⁴	1000	0									
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **166.667**

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

20141

Months To Exhaust

120.846

I.
Utilization⁶
=

Assigned Numbers(B) - Excluded
Numbers(D)

X 100 =
58.073

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Attachment C

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 TM 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.)