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March 16, 2016

Via Overnight delivery

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

**Re: Case No.: QWE-T-16-03
Request for Waiver**

Dear Ms. Jewell:

Enclosed for filing is an original and seven (7) copies of the revised Request for Waiver pleading in this docket. The header has been revised. Please replace this pleading with the previous document. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Maura Reynolds".

Maura Reynolds

Enclosure(s)
cc: Carolee Hall

Lisa A Anderl (WSBA# 13236)
CenturyLink
1600 7th Ave, Room 1506
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**PETITION OF QWEST CORPORATION dba
CENTURYLINK QC (“CENTURYLINK”)
FOR WAIVER OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING
RESOURCES FOR BOISE, IDAHO**

CASE NO. QWE-T-16-03

**QWEST CORPORATION’S REQUEST
FOR WAIVER**

Qwest Corporation dba CenturyLink QC (“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 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 CenturyLink. The 10,000 numbers in question are in the 208 NPA in the Nampa Rate Center, and are required to meet a specific customer need in the Nampa community. The customer requires these numbers as soon as possible, and will begin using them for planned expansion at this location. The customer requires a complete NXX ending in digits 3, 5 or 8 to incorporate with the existing internal dialing plan and multi-campus locations. Once

the new numbers are placed into service, the customer plans to return 1,000 of their existing DIDs. The customer's request is attached as Confidential Attachment A.

On March 1, 2016, CenturyLink submitted the customer's request for numbering resources to NeuStar. The request was immediately denied due to the "months to exhaust" calculation for the Nampa Rate Center. See Attachment B. This waiver request is for the "months to exhaust" usage threshold for numbering request.

The FCC permits a waiver of the kind request 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 (March 14, 2002). The order delegates 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 "months to exhaust" threshold requirements and direct NeuStar to provide a new NXX code (i.e. ten blocks of 1000 numbers) in the Nampa Rate Center in the 208 NPA as outlined above, to meet CenturyLink's customer's request.

Respectfully submitted this 16th day of March, 2016.

CENTURYLINK



Lisa A. Anderl
Attorney for CenturyLink

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

ATTACHMENT B

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAAG Part 3

Tracking Number : 208-NAMPA-ID-904613

Date of Application: 03/01/2016 Effective Date: _____

Date of Receipt: 03/01/2016 Date of Response: 03/01/2016

Service Provider Name: QWEST CORPORATION

(iconectiv™ LERG™ Routing Guide) OCN: 9636

Parent Company OCN: 9636

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706

Signature of Pooling Administrator

John Auerbach Fax: 925-363-7684

Name (print)

Email: john.auerbach@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 : _____

ATTACHMENT B

Switch Identification(Switch Entity/POI): ¹

NMPAIDMADS0

Rate Center:

NAMPA

X Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

ATTORNEY'S CERTIFICATE

Qwest Corporation d/b/a CenturyLink

Case No. QWE-T-16-03

This Certificate is made pursuant to Rule 67 of the Idaho Public Utilities Commission's Rules of Procedure I.D.A.P.A. 31.01.01000.

This Certificate applies to the enclosed Confidential Waiver Request by Qwest Corporation d/b/a CenturyLink on behalf of a customer. These documents are considered proprietary and confidential due to the CenturyLink proprietary information and the customer-specific proprietary information contained therein.

The undersigned hereby attests that she is familiar with the material claimed not to be available for public inspection, examination and copying, and that she, in good faith, believes that there is a basis in law for that claim, namely that the information contained therein constitutes a "trade secret" as defined in Idaho Code Section 48-801 and is by virtue the Idaho Trade Secrets Act, Title 48, Chapter 8, Idaho Code subject to protection.

DATED this 11th day of March, 2016.



Lisa A. Anderl
Attorney for CenturyLink

Appendix 3

January 12, 2015

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

Tracking Number: 208-NAMPA-ID-904613

Date: Tuesday, March 1, 2016

OCN: 9636

Company Name: QWEST CORPORATION

Rate Center: NAMPA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 208-442, 461, 463, 465, 466, 467, 468, 505-2

Name of Block Applicant: Rita Schmitz

Signature: Rita Schmitz

Title: Process Analyst II

Telephone No.: 608-796-5600

FAX No.:

E-Mail: Rita.Schmitz@CenturyLink.com

A. Available Numbers:

B. Assigned Numbers:

C. Total Numbering Resources:

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³: 0

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

Month												
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth
History -

Previous 6
months⁴

F. Forecast
- Next 12
months⁵

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

H. Months
to Exhaust⁶
=
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1		

I.
Utilization⁷
=
$$\frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$$

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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))