



**Jason D. Topp**  
Senior Corporate Counsel - Regulatory  
(651) 312-5364

December 19, 2012

Patricia Van Gerpen  
Executive Director  
Public Utilities Commission  
Capitol Building, 1st Floor  
500 East Capitol Avenue  
Pierre, SD 57501-5070

Re: In the Matter of the Filing by Qwest Corporation dba CenturyLink for  
Approval of Waiver of the Utilization Threshold Requirements in Sioux Falls,  
South Dakota  
Docket No. TC12-190

Dear Patricia:

This letter follows up on questions raised by the Commission in its December 18, 2012 meeting regarding the above-referenced matter. Our original letter contained some errors and so this is a corrected version.

By this letter, Qwest Corporation, d/b/a CenturyLink (CenturyLink) is requesting a waiver of the utilization threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow PA/NeuStar, the Number Pooling Administrator, to assign 1,000 numbers to CenturyLink to fulfill a customer request.

On December 4, 2012, CenturyLink was contacted by a customer requesting 1,000 consecutive numbers in the "2" block (i.e., NXX-2) specifically of "any NXX to incorporate with their existing numbering ranges and which will accommodate the existing internal company dialing plan."

After reviewing the current numbering inventory for the Sioux Falls rate center, CenturyLink determined that it could not fulfill the customer request from existing TN inventory as it does not meet the FCC Months-to-Exhaust (MTE) nor the Utilization assignment criteria requirements.

200 South 5th Street, Room 2200  
Minneapolis, MN 55402  
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The FCC allows for a waiver of the rules when there is demonstrated need to service a specific customer request. The waiver process is specifically addressed in the FCC Third Report and Order (“Order”) as the “safety valve” process (See FCC 01-362, paras. 57-66), which went into effect on March 14, 2002. The Order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See Paras. 61, 66)

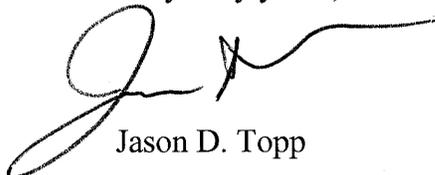
CenturyLink respectfully requests that the Commission approve the request for a waiver of utilization threshold requirements and direct PA/NeuStar assign a block (1,000 numbers) in the Sioux Falls Rate Center in the 605 NPA as outlined in this request to allow us to meet this specific customer request.

The directive can be mailed, emailed or faxed directly to:

Genevieve Bettiga  
PA Code Administrator  
NeuStar, Inc.  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 925-363-7652  
Fax: 925-363-7683  
Email: [Genevieve.Bettiga@neustar.biz](mailto:Genevieve.Bettiga@neustar.biz)

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact Paula Hustead (303-707-7770) or Bruce Bennett (303-707-7013). I would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,



Jason D. Topp

JDT/bardm

Enclosures