



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

February 21, 2017

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

Dear Ms. Van Gerpen:

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 a new Code of 10,000 numbers to CenturyLink to fulfill a customer request.

On February 16, 2017, CenturyLink was contacted by a large Sioux Falls customer requesting a new Code of 10,000 consecutive numbers in the 605-XX4, 605-XX5, 605-XX6 or 605-XX7 NPA in the Sioux Falls Rate Center to ensure new NXX will work with customer's internal dialing plan.

In order to satisfy the needs of the customer, CenturyLink submitted a request for a new Code of 10,000 numbers to PA/NeuStar on February 20, 2017. The request was immediately denied because CenturyLink's current Rate Center Month to Exhaust (MTE) and Rate Center Utilization did not meet the requirement. In order for the request to be approved, CenturyLink will require a waiver of the current utilization threshold for this application. The original request and subsequent denial have been provided with this letter as an attachment.

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)

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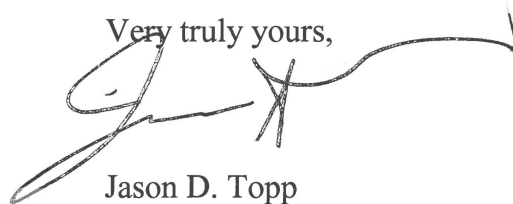
CenturyLink respectfully requests that the Commission approve the request for a waiver of utilization threshold requirements and direct PA/NeuStar to open a new NXX and provide a new Code of 10,000 consecutive numbers in the Sioux Falls Rate Center in the 605-XX4, 605-XX5, 605-XX6 or 605-XX7 NPA as outlined 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

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact Rita Schmitz at 608-796-5600. I would appreciate being copied on any correspondence with PA/NeuStar.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp", with a long horizontal flourish extending to the right.

Jason D. Topp

JDT/bardm

Enclosures