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March 6, 2008

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

RECEIVED
MAR 10 2008
**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Dear Patricia:

By this letter Qwest 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 provide 1,000 numbers to a Qwest customer.

The request is for 1,000 numbers in the 605 NPA, Huron Rate Center, to meet a specific customer's need in the community. Specifically, the customer is requesting 400 consecutive numbers from a thousands block that does not end begin with a 0, 1, 8, or 9. The customer has an immediate need for these numbers, and will begin using them as soon as they are available. No existing numbers will be returned upon receiving the new numbers.

In order to satisfy the customer request, Qwest submitted a request for a block of numbers (1,000 numbers) to PA/NeuStar on March 3, 2008. In order for the request to be approved, Qwest will require a waiver of the current usage threshold for new numbering requests. The original customer request has been provided with this letter as a confidential attachment.

The FCC allows for a waiver of the rules when there is demonstrated need such as a specific customer request for a large block of numbers. 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)


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

The directive can be mailed or faxed directly to:

Julie Kline
PA Code Administrator
NeuStar, Inc.
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7653
Fax: 925-363-7686
Email:Julie.kline@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 me at 303-896-1016. I would appreciate being copied on any correspondence with PA/NeuStar.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin D. Manwarren', with a long, sweeping flourish extending to the right.

Kevin D. Manwarren

Attachment

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAAG Part 3

Tracking Number : 605-HURON-SD-190341

Date of Application: 03/03/2008 Effective Date: _____
Date of Receipt: 03/03/2008 Date of Response: 03/03/2008

Service Provider Name: QWEST CORPORATION
(Telcordia™ LERG™
Routing Guide) OCN: 9631

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Julie Kline Phone: 925-363-7653
Signature of Pooling Administrator
Julie Kline Fax: 925-363-7686
Name (print)
Email: julie.kline@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 : _____

Switch Identification(Switch Entity/POI): ¹ HURNSDCODS1
Rate Center: HURON
Rate Center Sub Zone: _____

Form Complete, request denied.

Explanation:
DR-00: You do not meet the MTE requirements, therefore this request for a new block 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 (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

Thousands-Block Application Form - Part 1A

Tracking Number: **605-HURON-SD-190341**
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 St**
 City, State, Zip: **Denver, CO, 80202**
 Contact Name: **Jacob Barlow**
 Contact Address: **700 W Mineral Ave, Grid MN D19.10**
 City, State, Zip: **Littleton, CO, 80120**
 Phone: **303-707-7004** FAX: **_** E-mail: **Jacob.Barlow@qwest.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Julie Kline**
 Contact Address: **1800 Sutter St**
 City, State, Zip: **Concord, CA, 94520**
 Phone: **925-363-7653** FAX: **925-363-7686**
 E-mail: **julie.kline@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: 605 LATA: 640 OCN:^{iv} 9631 Parent Company's OCN 9600
 Number of Thousands-Blocks Requested : 1
 Switching Identification(Switch Entity/POI) : ^v HURNSDCODS1
 City or Wire Center Name : Huron Rate Center:^{vi} HURON
 Rate Center Sub Zone: _____

1.3 Dates:

Date of Application:^{vii} 03/03/2008 Requested Block Effective Date:^{viii} 04/03/2008
 Request Expedited Treatment? (See Section 8.6) Ycs No

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) 605-353-3
- 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

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.

Jacob Barlow

Signature of Block Applicant

Qwest Code 03/03/2008
Administrator

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. They 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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.

^xSelect 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: **605-HURON-SD-190341**

Date: **03/03/2008**

OCN: **9631**

Company Name: **QWEST CORPORATION**

Rate Center: **HURON**

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

Name of Block Applicant: **Jacob Barlow**

Signature: **Jacob Barlow**

Title: **Qwest Code Administrator**

Telephone No.: **303-707-7004**

FAX No.:

E-mail: **Jacob.Barlow@qwest.com**

A. Available Numbers: **4216**

B. Assigned Numbers: **11806**

C. Total Numbering Resources: **17000**

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: **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
E. Growth History - Previous 6 months ²	-24	-17	-26	6	-246	-42						
F. Forecast - Next 12 months ³	137	0	0	0	0	0	0	0	0	0	0	0

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **22,833**

H. Months to Exhaust⁴ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Block Requested	Available Numbers	Months To Exhaust
1	4216	184.645

I. Utilization⁵ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 = 69.447$

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.

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, section 52.15 (g) (3) (iii)).

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