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June 2, 2010

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

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 open a new NXX & provide 1,000 numbers to Qwest.

The request is for 1,000 numbers in the 605 NPA, Mitchell Rate Center, to meet the needs of Qwest to provide additional service to the community. Currently, Mitchell, South Dakota is served with an Ericsson AXE 10 switch (MTCHSDCODS1). In the late 1990's, a remote switch (MTCHSDCORS1) hosted out of Sioux Falls, was placed in Mitchell in order to provide some advanced services to the community, which were unavailable via the Ericsson switch. Two thousand telephone numbers (605-995-8000 thru 9999) were manually moved from the MTCHSDCODS1 switch to the MTCHSDCORS1 remote using older methods developed prior to local number portability (LNP). As such, the MTCHSDCORS1 remote does not have its own NPA-NXX from which a Local Routing Number (LRN) may be established. An LRN is required to allow number portability. In order to permit existing customers in the Mitchell community to take advantage of the services available from the remote and to keep their existing number, a new NPA-NXX is required so Qwest can establish an LRN for the MTCHSDCORS1 remote. Qwest would keep one block from this new NPA-NXX and establish an LRN from that block. Concurrently, Qwest would donate the remaining nine blocks to the industry pool for future assignment to carriers.

In order to satisfy Qwest's needs, Qwest submitted a request for a block of numbers (1,000 numbers) to PA/NeuStar on June 1, 2010. The request was immediately denied because Qwest'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, Qwest 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.

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The FCC allows for a waiver of the rules when there is demonstrated need. 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 open a new NXX and provide a block (1,000 numbers) in the Mitchell 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:

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 me at 303-383-6550. I would appreciate being copied on any correspondence with PA/NeuStar.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Manwarren', with a large, sweeping flourish at the end.

Kevin D. Manwarren

Attachment

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

ATTACHMENT A

Tracking Number: **605-MITCHELL-SD-362279**

Full NXX: LRN

Type of Application: New Change ¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity 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**

Code Administrator: ²

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5381** FAX: **571-434-5502**

1.2 NPA: **605** NXX: ³ LATA: **640** OCN: ⁴ **9631** Parent
Company's OCN(s) **9600**

Switching Identification(Switch Entity/POI) ⁵ **MTCHSDCORS1**

Locality/City/Wire Center:

Rate Center: ⁶
MITCHELL

Homing Tandem Operating Co: ⁷ **Qwest Corporation** Tandem Homing CLLI
⁸ :**SXFLSDCO09T**

1.3 Dates: Date of Application: **06/01/2010** Request Effective Date: ^{9 10}
08/06/2010 —

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? Yes ___ No ___ **X** ___

1.4 a) Type of company/entity requesting the code: **Incumbent Local Exchange Carrier (ILEC)**
___(LEC, IC, CMRS, Other)

b) Types of service: **Wireline** (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

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

ATTACHMENT A

- OCN-Intra-company ¹¹ Switching Id Rate Center Tandem Homing CLLI
 OCN-Inter-company ¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached **X** for BIRRDS ^{14 15}
 Additional Documentation is attached _____ Additional Documentation is not attached **X**

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁶

Jacob Barlow

Signature of Code Applicant

Qwest Code 06/01/2010
Administrator

Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ 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 may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ 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, and is the same on Part 2,

ATTACHMENT A

Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45 calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

TBPAG A

ATTACHMENT A

Thousands-Block Application Form - Part 1A

Tracking Number: **605-MITCHELL-SD-
362279**
Full NXX: LRN

Type of Application: New Change ⁱ 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: **Genevieve Bettiga**
Contact Address: **1800 Sutter St**
City,State,Zip: **Concord ,CA,94520**
Phone: **925-363-7652** FAX: **925-363-7683**
E-mail: **genevieve.bettiga@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ X

NPA: 605 LATA: 640 OCN: ^{iv} 9631 Parent Company's OCN 9600

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v MTCHSDCORS1

City or Wire Center Name : _____

Rate Center: ^{vi} MITCHELL

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 06/01/2010

Requested Block Effective Date: ^{viii} 08/06/2010

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.

ATTACHMENT A

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

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) **605-xxx-0,** _____

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.

Jacob Barlow

Signature of Block Applicant

Qwest Code **06/01/2010**
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

ATTACHMENT A

person may be reached, in addition to the correct phone, fax, and e-mail address. This 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 :

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.

ATTACHMENT A

Appendix 3

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

Tracking Number: **605-MITCHELL-SD-362279**

Date: **06/01/2010**

OCN: **9631**

Company Name: **QWEST CORPORATION**

Rate Center: **MITCHELL**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **605-995, 605-996**

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: **5659**

B. Assigned Numbers: **13748**

C. Total Numbering Resources: **20000**

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
-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	--------------	--------------	--------------

E. Growth
History -
Previous 6
months³

-24	-9	-32	-34	-22	-26						
------------	-----------	------------	------------	------------	------------	--	--	--	--	--	--

F. Forecast -
Next 12 months⁴

1	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): **0.167**

H. Months to Exhaust⁵ =

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

5659

Months To Exhaust

33886.228

$$\text{I. Utilization}^6 = \frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{\underline{68.74}}$$

ATTACHMENT A

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))

November 21, 2003
 ATIS-0300066.at3

ATTACHMENT B

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 605-MITCHELL-SD-362279

Date of Application: 06/01/2010 Effective Date: _____
 Date of Receipt: 06/01/2010 Date of Response: 06/01/2010

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

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-7652
 Signature of Pooling Administrator
Genevieve Bettiga Fax: 925-363-7683
 Name (print)
 Email: genevieve.bettiga@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 MTCHSDCORS1
 Rate Center: MITCHELL
 Rate Center Sub Zone: _____

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.

ATTACHMENT B

___ **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.)