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August 12, 2008

08-049-42

Julie Orchard  
Secretary  
Public Service Commission of Utah  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, Utah 84111

Dear Ms. Orchard:

By this letter Qwest is requesting a waiver of the 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 thousands block for a Qwest customer in the Utah 435 St. George Rate Center.

The request is for 1 thousands blocks (1,000 telephone numbers) in the 435 NPA, St. George Rate Center, to meet the specific needs of a customer in the community. The customer is requesting 40 sequential telephone numbers in a block that does not start with a 0 or 9. Qwest cannot satisfy this customer request with our existing numbering inventory and currently there are blocks available for assignment in NeuStar's industry pool inventory for the St. George Rate Center, therefore a new NXX will not have to be opened. Qwest is requesting that authorization be granted so that Neustar can assign a compatible block to Qwest for the customer.

In order to satisfy the customer's request, Qwest submitted a request for the numbers to PA/NeuStar on August 8, 2008. In order for the request to be approved, Qwest will require a waiver of the current Months to Exhaust (MTE) 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)

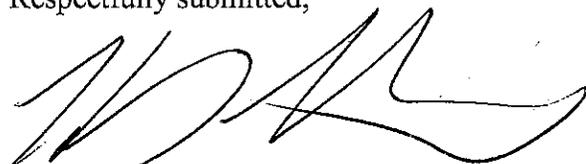
Qwest respectfully requests that the Commission approve the request for a waiver of Months to Exhaust threshold requirements and direct PA/NeuStar to assign 1 thousands block in the Utah 435 St. George Rate Center to allow Qwest to meet this specific customer request.

The directive can be mailed or faxed directly to:

Diane Mueller  
PA Code Administrator  
NeuStar, Inc.  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 925-363-7656  
Fax: 925-363-7655  
Email: [diane.mueller@neustar.biz](mailto:diane.mueller@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.

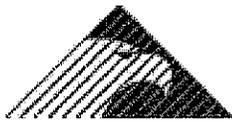
Respectfully submitted,

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

Kevin D. Manwarren

CC: Christopher Luras, Utah Division of Public Utilities

Attachment



**MOUNTAIN AMERICA**  
CREDIT UNION  
AND ITS DIVISIONS

August 07, 2008

Mountain America is establishing a new branch in St. George. This will be a larger branch with the need for 40 DIDs.

Mountain America is requesting 40 new DID assigns for the PRI.

The service needs to be active by the end of August 2008.

There are no specific TN ranges which are needed.

There are no specific NXXs which are needed.

Thank you,

Mountain America Credit Union

TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part I A

Tracking Number: **435-ST GEORGE-UT-  
229838**  
**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: <sup>ii</sup>

Contact Name: **Diane Mueller**  
Contact Address: **1800 Sutter St**  
City, State, Zip: **Concord, CA, 94520**  
Phone: **925-363-7656** FAX: **925-363-7655**  
E-mail: **diane.mueller@neustar.biz**

**1.2 General Information:**

Check one : No LRN needed  LRN needed <sup>iii</sup>

NPA: 435 LATA: 660 OCN: <sup>iv</sup> 9636 Parent Company's OCN 9600

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : <sup>v</sup> WASHUTMADS0

City or Wire Center Name : \_\_\_\_\_

Rate Center: <sup>vi</sup> ST GEORGE

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**

Date of Application: <sup>vii</sup> 08/08/2008

Requested Block Effective Date: <sup>viii</sup> 09/08/2008

Request Expedited Treatment? (See Section 8.6) Yes  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) \_\_\_\_\_
- 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

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  Switching Id  Part 1B

OCN:Inter-company  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](mailto:inc@atis.org) as of the date of this application.

**Jacob Barlow**

Signature of Block Applicant

**Qwest Code 08/08/2008**  
**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 <sup>xi</sup>. 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 /POL.
- 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.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 435-ST GEORGE-UT-229838

Date: 08/08/2008

OCN:9636

Company Name:QWEST CORPORATION

Rate Center: ST GEORGE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):435-628, 435-634, 435-635, 435-656, 435-673, 435-674, 435-688, 435-251-1, 435-251-2, 435-251-3, 435-251-4, 435-251-5, 435-251-6, 435-251-8, 435-251-9, 435-627-0, 435-627-1, 435-627-2, 435-627-4, 435-627-8, 435-627-9, 435-652-0, 435-652-1, 435-652-2, 435-652-3, 435-652-4, 435-652-5, 435-652-6, 435-652-7, 435-652-8, 435-652-9, 435-574-0, 435-574-2, 435-574-3, 435-574-6, 435-703-2, 435-772-0, 435-772-3, 435-772-7, 435-879-0, 435-879-2, 435-879-4, 435-879-6, 435-879-8, 435-986-0, 435-986-1, 435-986-2, 435-986-3, 435-986-4, 435-986-5, 435-986-6, 435-986-7, 435-986-8, 435-986-9

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:17969

B. Assigned Numbers: 89535

C. Total Numbering Resources:117000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: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
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E. Growth History - Previous 6 months <sup>3</sup>	140	-758	191	-328	-114	-351						
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F. Forecast - Next 12 months <sup>4</sup>	40	0	0	0	0	0	0	0	0	0	0	0
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):6.667

H. Months to Exhaust<sup>5</sup> =  $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Block Requested	Available Numbers	Months To Exhaust
1	17969	2695.215

I. Utilization<sup>6</sup> =  $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{X 100}}$  = 76.526

Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation: \_\_\_\_\_

<sup>1</sup>A 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.

<sup>2</sup>Quantity 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).

<sup>3</sup>Net 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.

<sup>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</sup>To 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)).

<sup>6</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPA G Part 3

Tracking Number : 435-ST GEORGE-  
UT-229838

Date of Application: 08/08/2008 Effective Date: \_\_\_\_\_  
 Date of Receipt: 08/08/2008 Date of Response: 08/08/2008

Service Provider Name: QWEST CORPORATION  
 (Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
 Routing Guide ) OCN: 9636

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Diane Mueller Phone: 925-363-7656  
 Signature of Pooling Administrator  
Diane Mueller Fax: 925-363-7655  
 Name (print)  
 Email: diane.mueller@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): <sup>1</sup> WASHUTMADS0  
 Rate Center: ST GEORGE  
 Rate Center Sub Zone: \_\_\_\_\_

**Form Complete, request denied.**  
 Explanation:  
**DR-57: You do not meet the MTE and/or Utilization 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:

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Remarks:

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)