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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

August 1, 2007

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 provide 10,000 numbers to a Qwest customer.

The request is for 10,000 numbers in the 605 NPA, Sioux Falls Rate Center, to meet a specific customer's need in the community. Specifically, the customer is requesting 10,000 numbers (full NXX code) in the 605-N12-XXXX range. 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 new NXX code (10,000 numbers) to PA/NeuStar on July 25, 2007. 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)

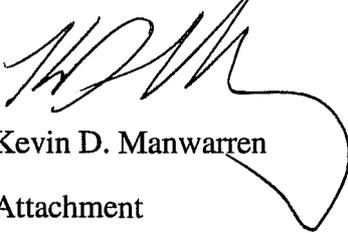
Qwest respectfully requests that the Commission approve the request for a waiver of utilization threshold requirements and direct PA/NeuStar to provide a new NXX code (10,000 numbers) in the Sioux Falls Rate Center in the 605 NPA with a specific NXX formatted as N12 as outlined in this request to allow 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 'K. Manwarren', with a large, sweeping flourish extending to the right.

Kevin D. Manwarren

Attachment

Pooling Administration System

 jgbarlo@qwest.com (SP)

[Sign Out](#)

Request Resources

State	SOUTH DAKOTA 
NPA	605 
Rate Center	SIOUX FLS 
OCN	9631-QWEST CORPORATION 
Type of Application	Application for a full NXX for a Dedicated Customer 

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

 jgbarlo@qwest.com (SP)

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Request Full NXX (Dedicated Customer)

Do you already have a block/code in this rate center? <input checked="" type="radio"/> Yes <input type="radio"/> No
Will all blocks be activated on the same switch? <input checked="" type="radio"/> Yes <input type="radio"/> No
Will there be multiple block effective dates requested? <input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="button" value="Back"/> <input type="button" value="Continue"/> <input type="button" value="Cancel"/>

Pooling Administration System

 jgbarlo@qwest.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Wednesday, July 25, 2007**

OCN **9631**

Company Name **QWEST CORPORATION**

Rate Center **SIOUX FALLS**

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

605-322, 605-328, 605-330, 605-331, 605-332, 605-333, 605-334, 605-335, 605-336, 605-338, 605-977, 605-978, 605-509, 605-575, 605-339, 605-357, 605-361, 605-362, 605-367, 605-373, 605-731-0, 605-731-1, 605-731-2, 605-731-3, 605-731-4, 605-731-5, 605-731-7, 605-782-0, 605-782-1, 605-782-2, 605-782-3, 605-782-4, 605-782-5, 605-782-6, 605-782-7, 605-782-8, 605-323-0, 605-323-1, 605-323-2, 605-323-3, 605-323-4, 605-323-6, 605-371-0, 605-371-1, 605-371-2, 605-371-3, 605-371-4, 605-371-5, 605-371-7, 605-371-8, 605-371-9, 605-988-0, 605-988-1, 605-988-2, 605-988-3, 605-988-5, 605-988-9

Name of Block Applicant **Mr Jacob Barlow**

Title **Code Administrator**

Telephone Number **(303) 707-7004**

Fax Number **(303) 707-9577**

E-Mail **jacob.barlow@qwest.com**

A. Available Numbers *

B. Assigned Numbers *

C. Total Numbering Resources *

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation *

List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months² *

Month 1	137	Month 2	-269
Month 3	-69	Month 4	-236
Month 5	149	Month 6	-25

F. Forecast - Next 12 months³ *

Month 1	9946	Month 2	-54
Month 3	-55	Month 4	-57

Month 5	-59	Month 6	-60
Month 7	-62	Month 8	-64
Month 9	-66	Month 10	-68
Month 11	-70	Month 12	-72

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **1610.167**

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	44358	27.549

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **77.869**

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, § 52.15 (g)(3)(iii)).

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

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Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option