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PUBLIC SERVICE COMMISSION

July 3, 2008

North Dakota Public Service Commission
Ms. Illona Jeffcoat-Sacco, Executive Secretary
600 E Boulevard Avenue – State Capitol
Bismarck, ND 58505-0480

RE: Waiver of Months to exhaust/utilization Threshold
Requirement – Bismarck Rate Center

Dear Ms. Jeffcoat-Sacco:

By this letter Qwest is requesting a waiver of the Months to Exhaust/Utilization Threshold requirement outlined in the FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No. 99-200, which would allow Neustar, North Dakota's Pooling Administrator, to provide numbering resources to Qwest. Qwest is requesting a new Thousands block (1,000 total numbers) in the Bismarck Rate Center to meet a specific customer request. The customer request is from Basin Electric Power Cooperative. The customer is requesting a specific number range for use of DID numbers due to continued growth. (See letter from Customer labeled Attachment A.)

In order to satisfy the customer request, Qwest submitted a request for the new block to the Numbering Administrator on June 30, 2008. The request was denied since Qwest did not meet the months-to-exhaust requirements for the Bismarck Rate Center. (See attached request from Qwest to the Pooling Administrator labeled Attachment B and the Denial from Neustar labeled Attachment C.)

The FCC allows for a waiver of the rules when there is a 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 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 waiver to the state commissions (See paras. 61,66).

Qwest respectfully requests that the Commission approve Qwest's request for a waiver of the FCC's utilization threshold and months to exhaust requirements and direct the Pooling Administrator to provide the requested one thousands block of numbers beginning, specifically the 5 block (701-NXX-5000 thru 5999) in the Bismarck Rate Center for use by Basin Electric Power Cooperative. The directive can be mailed to:

Ms. Julie Kline
Pooling Administrator
Neustar
1800 Sutter St., Suite 780
Concord, California 94520
Phone: (925) 363-7653
Fax (925) 363-7686
e-mail: Julie.Kline@neustar.biz

Please also send a copy of the Commission approval to me.

If you have questions, or need additional information, please contact me at any time.

Cordially,

A handwritten signature in black ink, appearing to read 'Kevin D. Manwarren', written in a cursive style.

Kevin D. Manwarren

Cc: Mr. Kent Blickensderfer

Attachment

**BASIN ELECTRIC
POWER COOPERATIVE**

1717 EAST INTERSTATE AVENUE
BISMARCK, NORTH DAKOTA 58503-0564
PHONE 701-223-0441
FAX: 701/224-5336



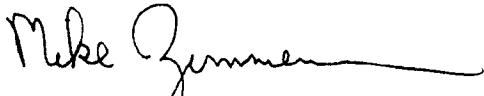
June 24, 2008

Kathy Kottenbrock
Account Consultant
Qwest Communications
220 N 5th St
Bismarck, ND 58501

Dear Ms. Kottenbrock:

We have not been able to incorporate available DID numbers in the Bismarck area into our dialing plan. We have approximately 30 DID numbers left in our assigned blocks. We would like to officially request and wish to order a block of 1000 DID numbers within the range of 5000-5999 with a new prefix. Please inform me what steps I need to take to accomplish this order. Thanks.

Sincerely,



Mike Zimmerman
Voice & Data Communications Supervisor

mz/mp

Attachment B

Thousands-Block Application Form - Part I A

Tracking Number: 701-BISMARCK-ND-219637
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: 701 LATA: 638 OCN: ^{iv} 9631 Parent Company's OCN 9631

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v

BSMRNDBCDS0

City or Wire Center Name : Bismarck

Rate Center: ^{vi} BISMARCK

Attachment B

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 06/30/2008 Requested Block Effective Date: ^{viii} 07/31/2008

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) 701-934-5,701-557-5,701-516-5,701-390-5

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 ^{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 _____

Attachment B

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 06/30/2008
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. The 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 :

Attachment B

- 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 CLLITM 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.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - T Attachment B
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 701-BISMARCK-ND-219637

Date: 06/30/2008

OCN:9631

Company Name:QWEST CORPORATION

Rate Center: BISMARCK

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):701-221, 701-222, 701-223, 701-224, 701-250, 701-255, 701-258, 701-323, 701-328, 701-530, 701-663, 701-667, 701-333-0, 701-333-1, 701-333-2, 701-333-3, 701-333-4, 701-333-5, 701-333-6, 701-355-0, 701-355-1, 701-355-2, 701-355-3, 701-355-4, 701-355-5, 701-355-7, 701-355-8

Name of Block Applicant:Jacob Barlow

Signature: Jacob Barlow

Title:Qwest Code Administrator
No.:

Telephone No.: 303-707-7004

FAX

E-mail: Jacob.Barlow@qwest.com

A. Available Numbers:26877

B. Assigned Numbers: 102271

C. Total Numbering Resources:135000

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	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth History - Previous 6 months ³	<u>-532</u>	<u>-184</u>	<u>-339</u>	<u>-126</u>	<u>-2</u>	<u>-28</u>
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Attachment B

F. Forecast
 - Next 12 months⁴ **1000** 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): **166.667**

H. Months to Exhaust⁵ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	26877	161.262

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$ **75.756**

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 3

Pooling Administrator's Response/Confirmation
TBPA Part 3

Attachment C

Tracking Number : 701-BISMARCK-ND-219637

Date of Application: 06/30/2008 **Effective Date:** _____
Date of Receipt: 06/30/2008 **Date of Response:** 06/30/2008

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 _____
Rate Center: _____
Rate Center Sub Zone: _____

BSMRNDBCDS0
BISMARCK

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:

Remarks:

Attachment C

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.)