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DEC 03 2008

PUBLIC SERVICE COMMISSION

December 1, 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. Basin Electric Power Cooperative 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 November 7, 2008. The request was denied since Qwest did not meet the months-to-exhaust requirements for the Bismarck Rate Center. (See Trade Secret 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 4 block (701-221-4000 thru 4999) 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 'K. Manwarren', with a large, stylized flourish at the end.

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

ATTACHMENT A



November 4, 2008

Kathy Kottenbrock
Account Consultant
220 N 5th Street
Bismarck, North Dakota 58501

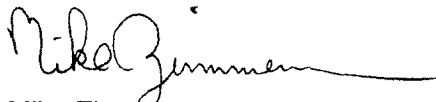
Dear Mrs. Kottenbrock:

As presented during the PSC Meeting in which we requested the DID number range of 5000 through 5999 under a new prefix, we also stated in our presentation that:

"We would intend to request that the number block of 4400 through 4999 under the new prefix be assigned to us as well. We could then incorporate our 4400 through 4459 DID group which is under the present prefix 221, under the new prefix. This would give us a spare capacity of 670 spare DID numbers."

We are now requesting this additional block of numbers under the new prefix 557 so we can start our implementation process of placing these numbers into our dialing plan. Please inform me what steps I need to take to accomplish this order.

Sincerely,



Mike Zimmerman
Voice & Data Communications Supervisor