

Jesse Nava
1801 California St, 9th Floor
Denver, CO 80202
(303) 383-6562
Jesse.NavaJr@qwest.com



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February 8, 2011

PUBLIC SERVICE COMMISSION

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 – Fargo 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 ten (10) one thousand blocks (10,000 total numbers) in the Fargo Rate Center to meet a specific customer request. The customer is requesting NXX ending in 7 (701-NX7) to meet the customer's internal dialing plan. The numbers requested will be put into service immediately by the customer who will then return approximately 1,700 TNs to Qwest. A new NPA-NXX is required. (See Trade Secret attached request from the Customer to Qwest labeled Attachment A.)

In order to satisfy the customer request, Qwest submitted a request for the new block to the Numbering Administrator on February 8, 2011. The request was denied since Qwest did not meet the months-to-exhaust requirements for the Fargo 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).

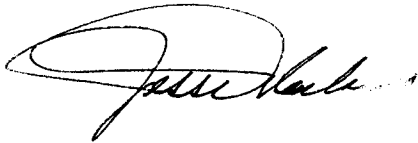
Qwest respectfully requests that the Commission approve Qwest's request for a waiver of the FCC's utilization threshold and months to exhaust requirements and direct the Pooling Administrator to provide the requested ten (10) one thousands block of numbers in the Fargo Rate Center for use by the Customer. The directive can be mailed to:

Ms. Agnes Rom
Pooling Administrator
Neustar
1800 Sutter St., Suite 780
Concord, California 94520
Phone: (925) 363-7650
Fax (925) 363-7681
e-mail: Agnes.Rom@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 "Agnes Rom", with a large, stylized flourish at the beginning.

Cc: Mr. Kent Blickensderfer

Attachment

February 2, 2011

Qwest Communications Inc.
Jim Tallakson
409 1st Ave North
Fargo, ND 58102

ATTACHMENT A

Dear Jim:

Sanford Health is an integrated network of healthcare facilities with over 18,000 employees serving 110 communities in six states. We are requesting the addition of an exclusive NNX to accommodate growth in our Fargo region. In the past 2 years we've experienced rapid growth and that will continue for many more years to come. Recent openings of our West 45th IT Center, Radisson Corporate Offices and Wells Fargo Marketing and HR office have depleted our inventory of 234-XXXX numbers. In the next 6 months we will be adding new services for our Revenue Management Dept, Orthopedics, Power, and Research Centers. This new NNX will not only allow for immediate growth but position us for our new Sanford Health Hospital located near 45th St SW and I94 in Fargo.

Our current dialing plan in Fargo includes DID's from prefixes 234, 280, and 461.

- 7600 numbers in the 234 prefix.
- 1000 numbers in the 280 prefix.
- 700 numbers in the 461 prefix.

Our goal is to retain the numbers in our current 234 prefix and acquire an exclusive NNX to accommodate growth and the replace the numbers used in our 280 and 461 prefixes. We are requesting an NNX ending in 7 (217,317,417,etc...) to incorporate our multi-campus dialing plan for both Fargo and the Sanford Health region.

We would appreciate your consideration for our NNX request of an additional 10,000 DID numbers. If you have any questions or need additional information, please feel free to contact me at 701-234-2577.

Sincerely,
Jon Bachmeier
Telecommunications Manager
Sanford Health, Fargo Region