



direction as to the appropriate place that such standard should be described. And in fact, the form as set-up is not currently conducive to containing such a standard.

Likewise, AT&T is not opposed to the P.01 standard for final trunk group blocking that Staff proposes, but notes that Staff did not address AT&T's primary concern expressed as follows in its Initial Comments, namely that:

the proposed service standards assume that carriers segregate inter and intra state toll traffic such that trunk blocking, for example, can be measured insofar as it relates only to intrastate toll service.<sup>1</sup> In general, this is not the case in AT&T's network and AT&T is unaware of any other carriers segregating toll traffic in the way Staff contemplates by its proposed rules.<sup>2</sup>

As the Commission is well aware, its jurisdiction is limited to intrastate toll traffic. Staff's has not addressed that problem with its standard and the fact that carriers cannot generally segregate out *inter* from *intra* state toll traffic. This makes the blocking standard, by default, a toll traffic standard that is broader than the Commission's jurisdiction.

Moreover, it does not appear that Staff really addressed the competitive nature of this service, although it did mention it in passing in its Reply.<sup>3</sup> That said, however, AT&T would like to ensure that Staff is not suggesting that the Commission has broader jurisdiction than it does; nor that Staff is recommending that the carriers should have to create separate trunk groups to carrier *inter* and *intra* state toll traffic just to comply with the proposed standard.

---

<sup>1</sup> OAR 860-023-0054(3).

<sup>2</sup> AT&T's Initial Comment at 2.

<sup>3</sup> Staff Reply Comments at 1.

Otherwise, AT&T concurs in the additional modifications Staff proposes, and takes no issue with any other carriers' initial comments in relation to the proposed standard.

Respectfully submitted this 20<sup>th</sup> day of May, 2005.

**AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC.**

*Letty S.D. Friesen*  
*by MK w/ Permission*  
\_\_\_\_\_  
Letty S.D. Friesen, No. 21848  
919 Congress Ave., Suite 900  
Austin, Texas 78701  
(303) 298-6475  
(303) 298-6301 (facsimile)  
lsfriesen@att.com

## CERTIFICATE OF SERVICE

I hereby certify that I sent an original and five copies of AT&T's Reply Comments in Docket No. AR 493 via overnight delivery and a copy via electronic mail this 20<sup>th</sup> day of May, 2005, to:

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

and a true and correct copy was sent via electronic mail this 20<sup>th</sup> day of May 2005, to:

LETTY S D FRIESEN  
AT&T COMMUNICATIONS OF THE PACIFIC  
NORTHWEST INC  
919 CONGRESS AVE STE 900  
AUSTIN TX 78701  
[lsfriesen@att.com](mailto:lsfriesen@att.com)

MARY JANE RASHER  
10005 GWENDELYN LN  
HIGHLANDS RANCH CO 80129  
[rasher@att.com](mailto:rasher@att.com)

RON L TRULLINGER  
QWEST CORPORATION  
421 SW OAK ST RM 810  
PORTLAND OR 97204  
[ron.trullinger@qwest.com](mailto:ron.trullinger@qwest.com)

BRANT WOLF  
OREGON TELECOMMUNICATIONS ASSN  
707 13TH ST SE STE 280  
SALEM OR 97301-4036  
[bwolf@ota-telecom.org](mailto:bwolf@ota-telecom.org)

*Letty Friesen*  
*by MK w/Permission*  
\_\_\_\_\_  
Letty Friesen