

January 22, 2009

Ms. Vikie Bailey-Goggins  
Public Utility Commission  
PO Box 2148  
Salem, OR 97308-2148

*Via Efile*

Dear Ms. Bailey-Goggins:

Integra Telecom of Oregon, Inc. (Integra) respectfully requests Commission concurrence with regard to the issuance of additional numbering resources for Integra's Beaverton rate center.

Integra has made a request of the NeuStar Pooling Administration to open a new NPA NXX, in particular 503-567-3XXX, out of Integra's BVTNOR18DS1 switch, on behalf of one of its customers. Integra's customer has built a significant marketing campaign which includes broad publication of telephone number 503-567-3669. Please see Attachment A, which is the memo from the customer to Integra in which he details the needs of his organization and identifies the telephone number needed.

On January 14, 2009 Integra received a Part 3 Response/Confirmation from the NeuStar Pooling Administrator (Attachment B) in which Integra's request for numbering resources was denied. According to FCC requirements, in order to qualify for additional numbering resources, carriers must submit paperwork demonstrating that the rate center for which the numbers are requested is at six months or less to exhaust and at 75% or more utilization. In cases where the service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions have jurisdiction. The Beaverton rate center does not meet the months to exhaust (MTE), therefore Integra does not qualify for additional numbers at this time.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a block of numbers, such as Integra is requesting. See *FCC Docket No. 99-200, Order No. 00-429, paragraph 186, released December 29, 2000*. The FCC then delegated authority to the state commissions to grant requests for additional numbering resources in its Third Report and Order on Numbering Resource Optimization:

...we delegate authority to state commissions to hear claims that safety valve should be applied when the NANPA or Pooling Administrator denied a specific request for numbering resources (footnote omitted)...We also clarify that states may grant request by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

Vickie Bailey-Goggins  
January 22, 2009  
Page 2

**This request asks for Commission consideration based upon paragraphs 61 and 64 or Order No. 01-362 relating to a specific customer request. This need is demonstrated by the customer's request, along with the Pooling Administrator's response to Integra's request for numbering resources both of which are submitted together with this request.**

Integra respectfully requests that the Oregon Public Utility Commission direct the NeuStar Pooling Administrator to allow an additional NPA NXX code, in particular 503-567-3XXX, to be assigned to Integra on the customer's behalf.

The directive for the numbers should be mailed to:

Diane Calhoun  
1800 Sutter St, Suite 780  
Concord CA 94520  
Phone: 925-363-7656,  
Fax: 925-363-7655  
Email: [diane.calhoun@neustar.biz](mailto:diane.calhoun@neustar.biz)

Thank you for your consideration in this matter. I would appreciate an expeditious decision relating to this request. Should you or Staff have any questions or concerns, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Murray" followed by a large, sweeping flourish.

Jeanne Bell  
Number Administrator  
Integra Telecom  
Direct: 503 453 8279  
Fax: 503 453 8284  
Email: [jeanne.bell@integratelecom.com](mailto:jeanne.bell@integratelecom.com)  
1201 NE Lloyd Blvd. STE 500  
Portland, OR 97232

Attachments

Attachment A

*SOUTHWEST FAMILY PHYSICIANS*  
*11900 SW GREENBURG ROAD*  
*TIGARD, OR 97223*  
*(503) 620-5556*  
*(503) 245-4669 FAX*  
*BRSTUTZ@GMAIL.COM*

TO: SHERRI JOHNSON  
FROM: BENJAMIN R. STUTZ  
SUBJECT: PHONE NUMBER 503 567-3669  
DATE: 1/21/2009

Dear Sherri:

We are in desperate need of acquiring the number 503-567-3669. We thought we had access to the number and have built an entire marketing campaign around it. Attached is an example of business cards that we have already printed. Advertising is beginning. Please do whatever is necessary to acquire this number ASAP. Thanks

Benjamin R Stutz  
Southwest Family Physicians.



Cynthia Gulick, D.O.

11900 S.W. Greenburg Road  
Tigard, OR 97223  
phone 503.567.3669 fax 503.624.0118

[www.mdbethin.com](http://www.mdbethin.com)

Attachment B

**From:** Bell, Jeanne  
**Sent:** Wednesday, January 14, 2009 12:08 PM  
**To:** Murray, Catherine A.  
**Subject:** FW: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 503-BEAVERTON-OR-266449  
Cathy,

Below is a copy of the Part 3.

**Jeanne Bell | Legacy ELI/Integra Number Administrator**  
Direct 503-453-8279 | Fax 503-453-8284  
1201 NE Lloyd Blvd., Suite 500, Portland OR 97232  
jeanne.bell@integratelecom.com

---

**From:** diane.calhoun@neustar.biz [mailto:diane.calhoun@neustar.biz]  
**Sent:** Wednesday, January 14, 2009 9:19 AM  
**To:** Bell, Jeanne  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 503-BEAVERTON-OR-266449



Dated 14 January 2009

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 503-  
BEAVERTON-  
OR-266449

**Date of Application:** 01/14/2009 **Effective Date:** \_\_\_\_\_

**Date of Receipt:** 01/14/2009 **Date of Response:** 01/14/2009

**Service Provider Name:** INTEGRA TELECOM OR

**(Telcordia™ LERG™ Routing Guide ) OCN:** 7482

**NPAC SOA SPID :** \_\_\_\_\_

**Pooling Administrator Contact Information:**

**Diane Calhoun** Phone: **925-363-7656**

---

Signature of Pooling Administrator

**Diane Calhoun** Fax: **925-363-7655**

---

Name (print)

Email: **diane.calhoun@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): <sup>1</sup>

**BVTNOR18DS1**

---

Rate Center:

**BEAVERTON**

---

Rate Center Sub Zone:

\_\_\_\_\_

**X Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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:**

---

---

<sup>1</sup> 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.)