



Verizon Northwest Inc.
20575 NW Von Neumann Dr.
Suite 150
Beaverton, Oregon 97006-6982
Mailcode: OR030156

Fax 503 629-0592

August 27, 2009

The Honorable Lee Beyer, Commission Chairman
Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

ATTENTION: Vikie-Bailey-Goggins, Administrator, Regulatory Operations

Dear Chairman Beyer,

Verizon Northwest Inc. respectfully requests that the Commission issue an order granting the Company a waiver of the Federal Communications Commission (FCC) months to exhaust criterion for the issuance of a new code that is required to establish an LRN for the new packet switch being installed in Beaverton, OR.

Verizon is preparing to deliver services to customers in the state of OR using new packet switching equipment that will start system test and verification in October of 2009. This new packet switching equipment will be activated in November 2009 as part of Verizon's transformation to an advanced broadband network. This new packet switch is not replacing the existing circuit switch. There will be no changes to the customer's voice service. Verizon requests a waiver to permit the assignment of the required Location Routing Number (LRN) in the 672 LATA in order to support Local Number Portability (LNP) and Telephone Number Pooling (TNP).

On May 26, 2009 Verizon applied for and was denied its application by the Pooling Administrator (PA) because Verizon's application did not satisfy Months-to-Exhaust and Utilization requirements to be assigned a thousands-block from a new NXX code for the purpose of obtaining an LRN. Because this new switch will function parallel with the existing circuit switched network, Verizon requires additional numbering resources.

Verizon requests that the Commission use its delegated authority to waive the Months-to-Exhaust and Utilization requirements so that it may be assigned the required NXX code to create one LRN in the LATA identified above. Verizon would then return the nine unused thousands-blocks in the NXX code to the appropriate rate center pool. Verizon respectfully requests the Commission's expedited consideration of this matter. Enclosed is Form Part I request and Utilization form for Staff's review. Please call me at (503) 645-7909 if you have any questions.

Sincerely,

Renee M. Willer
Verizon External Affairs

Attachments – Part I Worksheet, Months To Exhaust Worksheet

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
November 17, 2008

Tracking Number: _____

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: Verizon
Headquarters Address: ONE VERIZON WAY
City, State, Zip: BASKING RIDGE, NJ 07920
Contact Name: BARBARA INGRAM
Contact Address: 900 CLINTON AVE
City, State, Zip: IRVINGTON, NJ 07111
Phone: 973-399-5528 Fax: 973-399-0879 E-Mail: barbara.j.ingram@one.verizon.com

Code Administrator²:

Name: DIANE CALHOUN
Address: 1800 SUTTER ST. SUITE 570
City, State, Zip: CONCORD, CA 94520
Phone: 925-363-7656 Fax: 925-363-7655

1.2 NPA: 503 NXX³: _____ LATA: 672 OCN⁴: 4323 Parent Company's OCN(s): 0772
Switching Identification (Switching Entity/POI)⁵: BVTNORXBPSA
Locality/City/Wire Center: BEAVERTPM Rate Center⁶: BEAVERTON
Homing Tandem Operating Co.⁷: VERIZON Tandem Homing CLLI^{TM 8}: BVTNORXB03T

1.3 Dates: Date of Application: 05-26-09 Requested Effective Date^{9 10}: 10-31-09

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 a). Type of company/entity requesting the code: LEC (LEC, IC, CMRS, Other)
 b). Type of Service EOC (e.g., Cellular – Type 2)
 c). Code Assignment Preference (Optional) N/A
 d). Codes that are undesirable, if any N/A
 e). Type of Change (Mark **all** that apply):
 OCN: Intra-company¹¹ Switching Id Rate Center Tandem Homing CLLI
 OCN: Inter-company¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, Growth, etc.) GROWTH

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days.
If a growth code, attach months to exhaust worksheet.

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Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
November 17, 2008

Pool Indicator¹³: X Yes No

1.6 NPA Jeopardy Criteria Apply: Yes X No

1.7 Code request for new service (Explain): **New code required to establish an LRN for a new switch**

1.8 Part 2 attached Part 2 is not attached for BIRRDS^{14 15}
 Additional Documentation is attached Additional Documentation is not attached

Comments: _____

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/docs.asp>) as of the date of this application.¹⁶

| | | |
|-----------------------------|--|--------------------------|
| <u>Jeff Loffler</u> | <u>Specialist – Network Engineering</u> | <u>05-26-2009</u> |
| Signature of Code Applicant | Title | Date |

Central Office Code Assignment Guidelines (COCAG)
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¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ 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 may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

TM Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

⁸ 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, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
 (worksheet to be used for Requests for Additional Codes for Growth)

Date: 05-26-09_____ Company Name: Verizon_____

Rate Center: BEAVERTON_____

NPA(s)-NXXs included in growth calculation²: _503-259,264,277,324,350,356,357,359,431,439,443,456,466,469,520,521,524,526,531,533,547,574
 578,579,590,591,596,598,603,605,613,614,615,617,620,624,626,627,628,629,639,640,641,642,643,644,645,646,648,649,670,671,672,677,681,684
 690,693,696,712,844,846,848,968,985,992_____

Signature of Authorized Representative of Code Applicant: Jeff Loffler_____

Title: Specialist – Network Engineering_____ Telephone No.: 972-615-7500_____ FAX No.: 972-615-7506_____

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 193488_____

| | Month #1 | Month #2 | Month #3 | Month #4 | Month #5 | Month #6 | Month #7 | Month #8 | Month #9 | Month #10 | Month #11 | Month #12 |
|---|----------|----------|----------|----------|----------|----------|----------|----------|----------|-----------|-----------|-----------|
| B. Previous 6-month growth history ⁴ | -457 | 128 | -485 | -1224 | -1633 | -385 | | | | | | |
| C. Forecast – Next months 1-12 ⁵ | -2981 | 795 | 953 | 689 | 576 | 499 | 298 | 360 | 316 | 313 | 379 | 150 |

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): __89_____

E. Months to Exhaust⁶ = $\frac{\text{Telephone Numbers (TNs) Available for Assignment (A)}}{\text{Average Monthly Forecast (D)}}$ = _____2174_____

F. Utilization Level⁷ = $\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's Inventory}} \times 100$ = _____66.45_____%

Explanation: TNs Assigned: 419329 TNs Installed: 631000

1 A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.
 2 Report on all resources for the requested geographic area, including newly acquired codes.
 3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.
 4 Net 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.
 5 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
 6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).
 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

Dated 26 May 2009

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 503-
BEAVERTON-
OR-295941

Date of Application: 05/26/2009 Effective Date: _____

Date of Receipt: 05/26/2009 Date of Response: 05/26/2009

Service Provider Name: VERIZON NW-OR
(Telcordia [™] LERG [™] Routing Guide) OCN: 4323

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): ¹ **BVTNORXBPSA**
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.

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Explanation:

Remarks:

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.)