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VIA EMAIL TRANSMISSION

Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: MCI metr

MCI metro Transmission Services Corp. (“MCI metro”) requests that the Oregon Public Utility Commission (“Commission”) grant a waiver of the Federal Communications Commission (FCC) number utilization criteria and grant MCI metro two (2) one thousand blocks from the numbering pool in the Portland rate center.

MCI metro has received a request for 2,600 contiguous numbers from a large business customer. MCI metro does not have an adequate supply of telephone numbers to satisfy this request in the Portland rate center. The customer has some technical restrictions which require that the new numbers be in the same NPA as well as in an NXX that does not end in 0, 1 or 9. MCI metro qualifies for only 1,000 numbers at this time and an application for the 1,000 has been made. MCI metro needs a waiver for the additional two blocks needed to meet the customer’s request.

MCI metro submitted the Part 1A through the Pooling Administrator System (“PAS”), but its request was denied as MCI metro does not meet the 75% utilization level for this rate center. In cases where a service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions will have jurisdiction. In its Second Report and Order on Numbering Resource Optimization, the FCC allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as MCI metro is requesting. **Confidential Exhibit A**, which has been emailed separately to Stephen Hayes, contains the Thousands Block Application Form Part 1A, the MTE/Utilization Worksheet, the Part 3 denial message from the PAS and the customer request letter.

MCI metro respectfully request that the Commission grant its request for two (2) one thousand blocks in the Portland rate center.

Please contact me with any questions.

Sincerely,

/s/ (Kathleen A. Bonette)

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