

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1309

In the Matter of)	
)	ORDER
VERIZON NORTHWEST INC)	
)	
Sherwood Rate Center Numbering)	
Expansion.)	

DISPOSITION: APPLICATION FOR WAIVER APPROVED

On April 10, 2007, Verizon Northwest Inc (Verizon) filed an application with the Public Utility Commission of Oregon (Commission) requesting a waiver of the Federal Communications Commission (FCC) requirements involving the Months to Exhaust (MTE) criterion for the Sherwood rate center. Verizon is requesting that NeuStar, the Oregon number pooling administrator assign 2,000 new sequential numbers in the company’s SHWDORXADS0 switch to allow the company to satisfy the request of Sherwood School District for 2,000 new direct inward dialing (DID) numbers.

Due to expansion of its facilities, the Sherwood School District is realigning the district’s telephone numbering scheme and requires 2,000 direct inward dialing (DID) numbers. The customer requests that the numbers be in prefix 625 or 925. The customer also requests that its new numbers be sequential and provisioned in blocks 1XXX through 8XXX. The customer’s telephone number scheme is restricted from using the 0XXX or 9XXX blocks. Verizon examined its SHWDORXADS0 switch and confirms that the company does not currently have numbers available in its inventory to satisfy the customer’s request.

On December 28, 2001, the FCC released Order No. 01-362 (FCC Order). The FCC delegated authority to state commissions to hear claims that a safety valve mechanism should be applied when the North American Numbering Plan Administrator (NANPA) or pooling administrator denies a specific request for numbering resources. In order to secure state commission authority for a safety valve mechanism, a carrier must make:

1. A showing that the carrier has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.¹

¹ A carrier may demonstrate such a need by providing the Commission with documentation of the customer request and current proof of utilization in the rate center.

OR

2. A showing that even though the safety valve mechanism should be narrowly applied to meet specific customer requests or to meet a carrier's immediate numbering needs, the Commission should still consider the request from a carrier with multiple switches in a given rate center and determine whether relief is warranted on a case-by-case basis.

Verizon has made the first showing. Thus, Verizon's current request meets the requirements for a waiver of the MTE criterion. Staff recommends the Commission grant a waiver of FCC requirements involving the MTE criterion for the Sherwood rate center, and the SHWDORXADS0 switch. Staff's memo is attached as Appendix A.

ORDER

IT IS ORDERED that Verizon Northwest Inc's request for waiver of the Federal Communications Commission requirements involving Months to Exhaust criterion is approved.

Made, entered, and effective APR 23 2007.



A handwritten signature in dark ink, appearing to read "Lee Sparling", is written over a horizontal line.

Lee Sparling
Director
Utility Program

A party may request rehearing or reconsideration of this order pursuant to ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-014-0095. A copy of any such request must also be served on each party to the proceeding as provided by OAR 860-013-0070(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480-183.484.

PUBLIC UTILITY COMMISSION OF OREGON
INTEROFFICE CORRESPONDENCE

DATE: April 17, 2007 *LB*
TO: File through Lance Ball and Dave Booth *DB*
FROM: David Sloan *DS*

SUBJECT: UM 1309, Verizon Northwest Inc (Verizon): Application for waiver of Federal Communications Commission (FCC) requirements for assignment of additional numbering resources.

On April 10, 2007, Verizon filed an application requesting a waiver of the FCC requirements involving the Months to Exhaust (MTE) criterion for the Sherwood rate center. The filing has been docketed as UM 1309. Verizon is requesting that NeuStar, the Oregon number pooling administrator, open a block of 2,000 numbers in the company's SHWDORXADS0 switch to allow the company to satisfy the request of Sherwood School District for new numbers.

Due to the recent passage of a new school levy, Verizon's customer, Sherwood School District, is building a new elementary school and middle school, and is also substantially remodeling its high school. Associated with the expansion project, the school district will require 2,000 sequential direct inward dialing (DID) numbers to accomplish a realignment of the district's telephone numbering scheme. The customer is requesting a sequential series of 2,000 numbers with a prefix of 625 or 925 and blocks numbered 1XXX through 8XXX. Its numbering scheme can not accommodate blocks beginning with a zero or a nine. This should meet Sherwood School District's number requirements in its five-year plan. The customer requests that the new numbers be available for its use by June 15, 2007.

Currently, the school district has 900 DID numbers split between 3 different blocks. No block is less than 10 percent contaminated, so the numbers will not be returned to NeuStar but will instead go back to Verizon's number inventory. After the new numbers are activated, the school district will leave the existing telephone numbers in place for approximately one year to ease the transition for parents, community members, patrons and staff. When the numbers are returned to Verizon, it will hold them for approximately one year before making them available for reassignment.

Verizon does not have numbers in its number inventory to satisfy the customer's request for 2,000 new numbers. On February 1, 2007, Verizon requested from NeuStar the numbers to satisfy its customer's request. The request was immediately denied as not meeting the FCC's MTE requirements for assignment of additional numbers. According to FCC guidelines, to qualify for additional numbering resources, carriers must demonstrate that the rate center for which the numbers are requested is six months or less to exhaust, and is at 75 percent or more utilization. Verizon included with its application a copy of the request to NeuStar, which shows that the Sherwood rate center is at 42.7 months to exhaust and is at 65.9 percent utilization. Since Verizon's request to NeuStar does not meet the FCC guidelines, the company must get a waiver from the Oregon PUC for the additional numbers.

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In FCC 01-362, dated December 28, 2001, the FCC adopted a safety valve mechanism to allow individual state commissions, under special circumstances, to hear claims of carriers when the North American Numbering Plan Administrator (NANPA) or Pooling Administrator denies a specific request for numbering resources. In the order, the FCC adopted one specific safety valve for “carriers that receive a specific customer request for numbering resources that exceeds their [the carrier’s] available inventory;” a second safety valve was approved for “carriers experiencing rapid growth in a given rate area;” and thirdly, the FCC, in its order, gives states “some flexibility to direct the NANPA or Pooling Administrator to assign additional numbering resources to carriers that have demonstrated a verifiable need for additional numbering resources” that don’t meet the criteria for the two safety valves. See FCC 01-362, paragraphs 61 through 66.

Verizon’s application meets the requirements of the FCC’s first safety valve, “carriers that receive a specific customer request for numbering resources that exceeds their [the carrier’s] available inventory.” Consequently, the commission should approve Verizon’s request for waiver of the FCC requirements involving MTE criterion. A proposed order has been prepared for Lee Sparling’s signature.

Verizon UM 1309