

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1382

In the Matter of	)	
	)	
QWEST CORPORATION	)	ORDER
	)	
Roseburg Rate Center Numbering	)	
Expansion.	)	

**DISPOSITION: APPLICATION FOR WAIVER APPROVED**

On June 2, 2008, Qwest Corporation (Qwest) 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 Roseburg rate center. Qwest is requesting that NeuStar, the Oregon number pooling administrator, assign six sequential blocks of 1,000 numbers in the company’s RSBGOR57DS0 switch to allow the company to satisfy the request of Mercy Medical Center (Mercy) of Roseburg, Oregon for new numbers.

Related to the expansion of its facilities in Roseburg, Oregon, Mercy requires 3,900 direct inward dial (DID) numbers spread over six sequential thousands blocks (1XXX through 6XXX) for its network dialing plan. Qwest examined its RSBGOR57DS0 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.<sup>1</sup>

OR

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<sup>1</sup> 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.

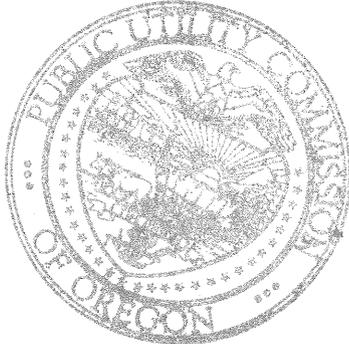
2. A showing that even though the safety valve mechanism should be narrowly applied to meet specific customer requests or to meet a carrier's immediate numbering needs, the Commission should still consider the request from a carrier with multiple switches in a given rate center and determine whether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

Qwest has made the first showing. Thus, Qwest'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 Roseburg rate center, and the RSBGOR57DS0 switch. Staff's memo is attached as Appendix A.

**ORDER**

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

Made, entered, and effective         JUN 10 2008        .



A handwritten signature in black ink that reads "Lee Sparling".

**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: June 4, 2008

TO: File through Lee Sparling, Dave Booth, and Lance Ball 

FROM: David Sloan 

**SUBJECT: UM 1382, Qwest Corporation (Qwest): Application for waiver of Federal Communications Commission (FCC) requirements for assignment of additional numbering resources.**

On June 2, 2008, Qwest filed an application requesting a waiver of the FCC requirements involving the Months to Exhaust (MTE) criterion for the Roseburg rate center. The filing has been docketed as Docket No. UM 1382. Qwest is requesting that NeuStar, the Oregon number pooling administrator, open six sequential blocks of 1,000 numbers in the company's RSBGOR57DS0 switch to allow the company to satisfy the request of Mercy Medical Center (Mercy) of Roseburg, Oregon for new numbers.

Mercy has completed its major building expansion in Roseburg, Oregon. Due to dialing plans at the medical center, Mercy is requesting six number blocks come from an NXX that ends in one through six (NX1 – NX6). The customer may eventually change from 4-digit dialing to 5-digit dialing internally, and having a prefix that ends in a number between one and six would greatly simplify that change. Also, the customer can not use number blocks that begin with 0, 7, 8, or 9 because they conflict with its dialing plan. Mercy will be utilizing 4,000 numbers out of the 6,000 opened spread over six sequential thousands blocks. Mercy is requesting the following numbers from the new NXX: 1200-1299, 1500-1599, 1700-2999, 3200-3399, 3500-3699, 4300-4699, 4800-4899, and 5000-6599. Qwest does not have sequential numbers in its number inventory to satisfy the customer's request. The numbers in Qwest's inventory that are in the Roseburg rate center are spread throughout various NXXs in small consecutive number groups and do not meet Mercy's request.

Qwest is specifically requesting blocks one through six (541-NXX-1000 through 541-NXX-6999) from a new NXX with a last digit of one through six (NX1 – NX6). Any numbers in the requested blocks that are not assigned to Mercy, as well as 4,400 currently utilized numbers that will be returned by Mercy, will be added to Qwest's number inventory for future assignment to other customers. Previously used numbers are normally aged for 12 months, or the life of the telephone directory, and then become available for reassignment. Any Qwest excess number inventory (thousand blocks) would be identified in Qwest's annual numbering resource utilization/forecast (NRUF) reporting to NeuStar. Blocks exceeding Qwest's forecasted demand based on past assignments are donated to the Pooling Administrator's inventory for use by other service providers.

On May 29, 2008, Qwest requested from NeuStar the numbers to satisfy its customer. 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

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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% or more utilization. Qwest included with its application a copy of the request to NeuStar, which shows that the Roseburg rate center is at a minimum of 18.57 months to exhaust and at 69.77% utilization. Since Qwest's request to NeuStar does not meet the FCC guidelines, the company must get a waiver from the Oregon Public Utility Commission for the additional numbers.

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.

Qwest'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 Qwest's request for waiver of the FCC requirements involving MTE criterion. A proposed order has been prepared for Lee Sparling's signature.

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