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July 24, 2007

Ms. Beckly L. Beier
Commission Secretary
Public Utility Commission of Oregon
550 Capitol Street NE, #215
PO Box 2148
Salem, OR 97308-2148

TCG Joint Venture Holdings Inc. dba TCG – Oregon (“AT&T”) (OCN 7531) respectfully requests that the Oregon Public Utility Commission (“Commission) grant an immediate and expedited request for a waiver of the Federal Communications Commission months-to-exhaust (MTE) and utilization criteria and grant AT&T’s request for an additional thousands-block for the Bend rate center to meet a specific customer request.

An Oregon customer has requested that AT&T provide 20 numbers for its business in the Bend rate center.¹ AT&T has developed a communications plan that the customer will implement and subsequently assign the 20 numbers as soon as they are available. In order to avoid a dial plan conflict and a PBX limitation, the customer is specifically requesting to have numbers assigned from a thousands-block that does not begin with 0 or 9. Unfortunately, AT&T cannot satisfy this customer’s request without receiving an additional thousands-block as its numbers resources in this rate center currently only consists of the 0 and 9 thousands blocks. Attached as **Confidential Exhibit A** is a letter from the customer documenting the request for numbers and the technical restrictions associated with being assigned numbers from the 0 and 9 thousands blocks.

Although AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new thousands-block, AT&T’s existing numbering resources cannot satisfy this customer’s specific need. Thus, on July 13, 2007, AT&T submitted a Thousands Block Application Form Part 1A and a Months to Exhaust and Utilization Certification Worksheet – TN Level (“MTE/Utilization Worksheet”) to the Pooling Administrator for an additional thousands-block in the Bend rate center. The Pooling Administrator System (“PAS”) denied AT&T’s request because AT&T did not meet the required criteria – six months to exhaust and a 75% utilization level.² **Confidential Exhibit B** contains the Thousands Block Application Form Part 1A and the MTE/Utilization Worksheet for AT&T’s request and the error message received from the PAS.

¹ AT&T considers the customer’s name proprietary information.


² See 47 C.F.R. §52.15(g) and (h).

The Federal Communications Commission (“FCC”) recognized that there could be situations in which a carrier did not meet the MTE and Utilization criteria yet still had a verifiable need for numbers. The FCC, therefore, delegated authority to the state commissions to hear carrier’s claims for a safety valve request when the Pooling Administrator denies a carrier’s request for numbering resources.³ The FCC also clarified that states could grant additional numbering sources to a carrier, “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.” The carrier must provide proof of a specific customer request.⁴ AT&T is making this request because it cannot satisfy this customer’s request for numbering resources with its current inventory.

In order to allow this customer to receive service from the carrier of its choice, AT&T respectfully requests the Commission to grant its request for a thousands-block in the Bend rate center (SALMORAEDS0 switch) and direct the Pooling Administrator to release to AT&T a thousands block that does starts with 1 through 8. AT&T recognizes that if for some reason the requesting customer withdraws its request and does not activate service, AT&T must return the thousands-block granted pursuant to this request to the Pooling Administrator.

If you have any questions regarding this request, please contact me at 425.580.8112.

Sincerely,


Cindy J. Manheim

cc: Dale Morgenstern

³ See In the Matter of Number Resource Optimization, Third Report and Order (“3rd NRO”), CC Docket No. 99-2000, FCC 01-362, (rel. December 28, 2001), ¶ 61.

⁴ Id, ¶64.

Exhibit A

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Exhibit B

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