

September 6, 2005

Ms. Vikie Bailey-Goggins
Public Utility Commission
PO Box 2148
Salem, OR 97308-2148

Dear Ms. Bailey-Goggins:

Integra Telecom of Oregon, Inc. (Integra) respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Integra's Beaverton rate center.

Integra is requesting from NeuStar/PA, the Oregon number pooling administrator, to open 3,000 numbers out of Integra's BVTNOR18DS1 switch. Integra customer, Keller Williams Realty, requests 3 blocks of 1,000 consecutive numbers out of the 503 NPA in the same NXX. Integra examined all available phone numbers in all of its switches and determined that it cannot meet the customer's criteria. Therefore, pending availability, Integra has requested 503-336-6, 7, and 8 for this customer.

On 8/29/2005 Integra submitted Part1A and MTE (Months to Exhaust) Worksheet to the NeuStar/PA via their online system requesting 3 blocks of 1,000 numbers to satisfy the customer. The request was denied. According to FCC requirements to qualify for additional numbering resources, carriers must submit paperwork demonstrating that the rate center for which the numbers are requested is at six months or less to exhaust and is at 75% or more utilization. In cases where the service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions with have jurisdiction. The Beaverton rate center is at approximately 25 months to exhaust and at 55.261% utilization; therefore, Integra does not qualify for additional numbers at this time.

In its Second Report and Order on Numbering Resource Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a demonstrated need for a large block of numbers, such as we are requesting. *FCC Docket No. 99-200, Order No. 00-429, paragraph 186, released December 29, 2000.* The FCC then delegated authority to the State Commissions to grant request for additional

numbering resources in its Third Report and Order on Numbering Resource Optimization:

...we delegate authority to state commissions to hear claims that safety valve should be applied when the NANPA or Pooling Administrator denied a specific request for numbering resources (footnote omitted)...We also clarify that states may grant request by carriers that receive a specific customer request for numbering resources that exceeds their available inventory.

This request asks for Commission consideration based upon paragraphs 61 and 64 of Order No. 01-362 relating to a specific customer request. This need is demonstrated by the customer's request, along with current proof of utilization in the Beaverton rate center.

Integra respectfully requests that the Oregon Public Utility Commission direct NeuStar/PA to provide 3,000 numbers to be provisioned out of the BVTNOR18DS1 switch. Integra also requests Staff to contact NeuStar to reserve 503-336-6, 7 and 8 pending Commission approval.

The directive for the numbers should be mailed to:

Ms. Tara Farquhar
1800 Sutter St., Suite 780
Concord, CA 94520
Phone: 925-363-7654
Email: tara.farquhar@neustar.com

Thank you for your consideration in this matter. I would appreciate an expeditious decision relating to this request.

Sincerely,

Roxanne Richards
Numbering Administrator
Integra Telecom of Oregon, Inc.

Attachments



September 2, 2005

To Whom It May Concern:

My name is Derek Sherman and I am the IT Director representing 5 Keller Williams real estate brokerages located in and about Portland, Oregon. At the request of Steven Cawley of Integra, I am writing to request a block of 3000 DID to provision our new telephone system.

Each Keller Williams brokerage is independently owned and operated, but all of our owners place a great deal of value on creating a universal "presence" in how our company as a whole is perceived by the public. Real Estate is a very competitive business with an incredible emphasis on phone and fax usage. To support this, the collective Keller Williams brokerages of the Portland area have grouped together to build a unified phone and fax system to provide standardized services to all KW brokerages.

We have 5 market centers now, but will be creating 3 more in the near future for a total of eight. For each agent, the market center will provide two DID numbers one for phone and a second for fax. If an agent has an assistant, this individual will also have this same allocation. Then there is the market center itself, with a main phone number and fax number and the market center's staff as well.

Keller Williams as a company has experienced exponential growth nation wide in terms of agent count. So when we are trying to anticipate how many numbers we will need in the next two years we estimate that we will have 150 agents per market center for a total of 1200. Times this by one number for fax and one number for phone and you have 2400+ DID's consumed in the first two years. What must be factored in at this point is how many additional agents, brokerages, assistants, etc will actually require numbers over the next 2 to 5 years. By receiving the block of numbers we have requested, we will have an adequate reserve of numbers to serve our market centers for the foreseeable future.

Keller Williams also places great importance on the 503 areacode. Part of the reason we are seeking this block is to obtain the universally recognized 503 area code and the advantage of one prefix for our numbers. Call routing and marketing are made much easier by this simple advantage.

Regards,

Derek Sherman

Pooling Administration System

Dated 30 August 2005

Pooling Administrator's Response/Confirmation Part 3

Tracking Number 503-BEAVERTON-OR-104847
Date of Application 08/29/2005 Block Effective Date
Date of Receipt 08/29/2005 Date of Response 08/30/2005
Service Provider Name Integra Telecom
(Telcordia™ LERG™
Routing Guide) OCN 7482-INTEGRA TELECOM OR
NPAC SOA SPID

Pooling Administrator Contact Information :

Name Tara Farquhar
Phone (925) 363-7654 Fax (925) 363-7695
E-Mail tara.farquhar@neustar.com

Response

— NPA-NXX-X 0-0-0 Block Assigned
Block Disconnected

Block Contaminated null
(Yes or No)

Block Allocation Date
Switch Identification BVTNOR18DS1
(Switching Entity / POI)
Rate Center BEAVERTON
Rate Center Sub Zone

X **Form Complete, block requested denied**

Explanation :

DR-3: No documentation to support the State Waiver request was received. Please resubmit your request with documentation supporting the State Waiver. 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.

— **Assignment activity suspended by the administrator**

Explanation :

Further Action :

Remarks :

Bottom of Form

Pooling Administrator
Tara Farquhar
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: (925) 363-7654
Fax: (925) 363-7695