



September 8, 2005

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

RE: Number Pooling Request
UM

Dear Sirs:

SBC Long Distance, LLC respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in SBCLD's Beaverton rate center.

SBCLD is requesting from Neustar/PA, the Oregon number pooling administrator, to open 1,000 numbers (971-732-1XXX) out of the Beaverton rate center (PTLDOR13DS3 Qwest switch, PTLGORYRDS0 SBCLD local switch). SBCLD has a customer who has PBX equipment that is unable to accept the current block of numbers SBCLD has in inventory, (971-217-0XXX). The customer's PBX equipment prohibits the line range to start with a "0", for this reason SBCLD is requesting this available 1,000 block of numbers (971-732-1XXX).

On 08/26/2005, SBCLD submitted a Part 1A and MTE (Months to Exhaust) Worksheet to Neustar/PA via their online system requesting one block of number to satisfy the customer. The request was immediately denied. According to FCC requirements, to qualify for additional numbering resources carriers must submit paperwork demonstrating 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 will have jurisdiction. Per the National Pooling web site (www.nationalpolling.com), the Beaverton rate center has a total of 199 blocks available for the 503/971 NPA. SBCLD is unable to determine the MTE for the total rate center. However, for SBCLD we have provided under confidential cover our MTE and utilization for the Beaverton rate center. Due to the MTE and utilization, SBCLD does not qualify for additional numbers at this time.

In its Second Report and Order on Numbering Resources Optimization, the Federal Communications Commission (FCC) allowed for a waiver of the rules when there is a

demonstrated need for a block of numbers, such as we are requesting. FCC Docket No. 99-200, Order No. 00-429, ¶ 186, released December 29, 2000. The FCC then delegated authority to the State Commissions to grant requests for additional numbering resources in its Third Report and Order on Numbering Resources Optimizations:

... and we delegate authority to state commissions to hear claims that a 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 received a specific customer request for numbering resources that exceeds their available inventory.

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

SBCLD respectfully request that the Oregon Public Utility Commission direct Neustar/PA to provide 1,000 numbers provisioned out of the PTLGORYRDS0 switch. SBC would also like to request Staff to contact Neustar to reserve 971-732-1XXX pending Commission approval.

The directive for the numbers should be mailed to:

Teresa Jernigan
SBC
1111 W Capitol Ave, Room 525
Little Rock, AR 72201-5731
(501)373-0047
TJ2738@SBC.COM

Some of the information provided is confidential by SBCLD and is stamped as such.

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

Sincerely

ss/ Sam Maropis

Sam Maropis
Associate Director
Regulatory Relations