



Cindy Manheim
Senior Counsel, Regulatory
AT&T
P.O. Box 97061
Redmond, WA 98073

Phone: 425 580-8112
Mobile: 206 915-5557
Fax: 425 580-8333
Email: cindy.manheim@att.com

February 21, 2008

Ms. Becky 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) requests that the Oregon Public Utility Commission (“Commission”) grant a waiver of the Federal Communications Commission months-to-exhaust (MTE) and utilization criteria to grant AT&T’s request for an additional thousands block for the Beaverton rate center to meet a specific customer request.

An Oregon customer has requested that AT&T provide 1000 numbers for its business in the Beaverton rate center.¹ AT&T has developed a communications plan that the customer will implement and subsequently assign the 1000 numbers as soon as they are available. In order to integrate this new block into their existing 5-digit dial plan, the customer is specifically requesting numbers: 503-NX2-3XXX, 7XXX or 8XXX; 503-NX4-5XXX; 503-NX6-5XXX or 6XXX or 503-NX7-5XXX. Unfortunately, AT&T cannot satisfy this customer’s request without receiving an additional thousands block. Attached as **Confidential Exhibit A** is a letter from the customer documenting the request for numbers and acknowledging the specific

Although AT&T does have an adequate supply of numbers to satisfy incremental requests without receiving a new block, AT&T’s existing resources cannot satisfy this specific need. Thus, on February 14, 2008, 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 (PA) for an additional thousand block in the Beaverton 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 the customer to receive service from the carrier of its choice, AT&T respectfully requests the Commission to grant its request for a thousand block in the Beaverton rate center (TGRDORAODS0 switch) and direct the PA to release to block to AT&T. AT&T recognizes that if for some reason the requesting customer withdraws its request and does not activate service, AT&T must return the 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 *by MLL with permission*

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

REDACTED

Exhibit B

REDACTED