

June 13, 2008

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

Via Efile and FedEx Overnight Express Mail

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 Eugene rate center.

Integra is requesting NeuStar Pooling Administration to open a new NPA NXX out of Integra's SALMOR01DS0 switch on behalf of one customer. Integra's customer placed an expensive advertising order with a yellow page vendor that misprinted the business' phone number in the directory. The incorrect number is within an NPA NXX that is not yet open. Integra's current number inventory is unable to meet the customer's criteria for this specific number.

The customer has asked Integra to open the 541-357 NPA NXX on his behalf so the Company can obtain the phone number that corresponds to the customer's yellow page advertising. Please see Confidential Attachment A, a letter from the customer to Integra in which he details his dilemma and identifies the telephone numbers in question. Integra will retain the 1000 block only, and will donate the remaining blocks back to the pool.

On June 13, 2008 Integra submitted Part 1a and MTE (Months to Exhaust) worksheet to the NeuStar PA via its online system requesting to open the 541-357 code. NeuStar denied the request. According to FCC requirements, in order 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 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 have jurisdiction. The Eugene rate center is approximately 6.6 months to exhaust, and at 88% utilization, therefore Integra does not qualify for additional numbers at this time. Please see Attachment B.

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 block of numbers, such as Integra is requesting. See *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 requests for additional numbering resources in its Third Report and Order on Numbering Resource Optimization:

...we delegate authority to stat 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 or 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 Eugene rate center both of which are submitted together with this request.**

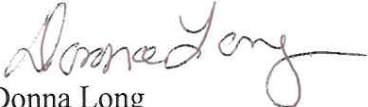
Integra respectfully requests that the Oregon Public Utility Commission direct NeuStar/PA to allow NPA NXX 541-357 to be opened and reserve the number block 541-357-1000 so that the Company can obtain the telephone number specified by its customer on his behalf

The directive for the numbers should be mailed to:

Diane Mueller  
1800 Sutter St, Suite 780  
Concord CA 94520  
Phone: 925-363-7656,  
Fax: 925-363-7655  
Email: [diane.mueller@neustar.biz](mailto:diane.mueller@neustar.biz)

Thank you for your consideration in this matter. I would appreciate an expeditious decision relating to this request. Should you or Staff have any questions or concerns, please contact the undersigned.

Sincerely,

  
Donna Long  
E911 & Number Administration  
Direct: 612 436 6634  
Fax: 612 436 6734  
Email: [dxlong@integratelecom.com](mailto:dxlong@integratelecom.com)  
730 Second Ave South, Suite 900  
Minneapolis, MN 55402

Attachments

**Long, Donna X.**

**Attachment B**

**From:** diane.mueller@neustar.biz  
**Sent:** Friday, June 13, 2008 8:49 AM  
**To:** Long, Donna X.  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 541-EUGENE-OR-217116



Dated 13 June 2008

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 541-EUGENE-OR-217116

Date of Application: 06/13/2008 Effective Date: \_\_\_\_\_  
Date of Receipt: 06/13/2008 Date of Response: 06/13/2008

Service Provider Name: ADVANCED TELCOM - OR  
(Telcordia™ LERG™  
Routing Guide ) OCN: 4271

NPAC SOA SPID : \_\_\_\_\_

**Pooling Administrator Contact Information:**

Diane Mueller Phone: 925-363-7656

Signature of Pooling Administrator

Diane Mueller Fax: 925-363-7655

Name (print)

Email: diane.mueller@neustar.biz

NPA-NXX or NPA-  
NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_  
Block Reserved : \_\_\_\_\_  
Block Reservation  
Expiration Date : \_\_\_\_\_  
Block/Code Modified : \_\_\_\_\_  
Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated(Yes or No) : \_\_\_\_\_  
If Yes,enter the number of TNs contaminated : \_\_\_\_\_  
Switch Identification(Switch Entity/POI): <sup>1</sup> EUGNOR53HG3  
Rate Center: EUGENE  
Rate Center Sub Zone: \_\_\_\_\_

**Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. 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.**

**Request withdrawn.**

Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)