

July 17, 2008

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

Via Efile & 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 Salem rate center.

Integra is requesting NeuStar Pooling Administration to open a new NPA NXX out of Integra's BVTNOR18DS1 switch on behalf of one large customer. Integra's customer requires several thousands blocks to accommodate its plans. The customer's phone system also requires that the NXX code end in 4, 5, 6, 7, 8, or 9. Integra's current number inventory is unable to meet the customer's numbering criteria. Please see Confidential Attachment A, a letter from the customer to Integra in which he details the needs of his organization and identifies the preferred ranges of telephone numbers.

On July 11, 2008 Integra received a Part 3 Response/Confirmation from the NeuStar Pooling Administrator (Attachment B) in which Integra's request for numbering resources is denied. 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 Salem rate center is approximately 6.7 months to exhaust, and at 86% 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 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.

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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 the Pooling Administrator's response to Integra's request for numbering resources both of which are submitted together with this request.

Integra respectfully requests that the Oregon Public Utility Commission direct the NeuStar Pooling Administrator to allow additional NPA NXX codes to be opened on the customer's 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

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,



Jeanne Bell
Number Administrator
Direct: 503 453 8279
Fax: 503 453 8284
Email: jeanne.bell@integratelecom.com
1201 NE Lloyd Blvd. STE 500
Portland, OR 97232

Attachments

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAAG Part 3

Tracking Number : 503-SALEM-OR-221822

Date of Application: 07/11/2008 Effective Date: _____
Date of Receipt: 07/11/2008 Date of Response: 07/11/2008

Service Provider Name: INTEGRA TELECOM OR
(Telcordia TM LERG TM Routing Guide) OCN: 7482

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): ¹ BVTNOR18DS1
Rate Center: SALEM
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 code 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:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM 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.)