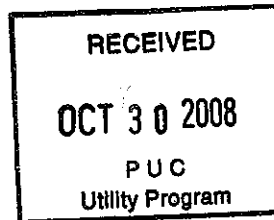


October 30, 2008



RECEIVED

OCT 31 2008

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

Public Utility Commission of Oregon
Administrative Hearing Division

Confidential Material
to Locked Cabinet
Env. # 413

Via Efile & Overnight Express Mail (UPS)

Dear Ms. Bailey-Goggins:

On July 30, 2008, the Commission approved a waiver of the Federal Communications Commission (FCC) requirements regarding the Months to Exhaust (MTE) criterion for Integra Telecom of Oregon, Inc. (Integra) on behalf of one of its largest customers. Because of that waiver, the North American Numbering Plan Administrator (NANPA) assigned seven, sequential 1000-blocks to Integra. The customer has since come back to Integra with a request to fill out the entire 10,000 number block. Integra respectfully requests Commission concurrence with regard to the issuance of additional numbering resources in Integra's Salem rate center.

Integra has requested the three (3) additional 1,000-blocks from NANPA. Please see Confidential Attachment A, a letter from the customer to Integra in which he further details the needs of his organization and identifies the three additional 1,000 blocks required by his organization.

On October 21, 2008 Integra received a Part 3 Response/Confirmation from the NeuStar Pooling Administrator (Attachment B) in which Integra's subsequent 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.

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 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.

Vickie Bailey-Goggins

October 30, 2008

Page 2

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 release three (3) additional 1,000-blocks on its customer's behalf.

The directive for the numbers should be mailed to:

Diane Calhoun

Pooling Administrator

Email: diane.calhoun@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