BEFORE THE PUBLIC UTILITIES COMMISSION OF OREGON

AR 493

In the Matter of the Rulemaking to Amend)	
OAR 860-023-0000, 860-023-0001 and 860-)	AT&T's REPLY COMMENTS
023-0054, Retail Telecommunications Service)	
Standards)	

AT&T Communications of the Pacific Northwest, Inc. and TCG Oregon (collectively "AT&T") hereby submit these reply comments in the above-captioned rulemaking.

INTRODUCTION

AT&T will briefly respond to Staff's written Reply here, and looks forward to the opportunity to more fully discuss the proposed standard, and the other rules, in the upcoming hearing. Oral conversation may lend itself to better understanding of each parties' concerns.

REPLY

AT&T does not oppose Staff creating a default rule where carriers lack any standard described in their Annual Reports and suggests that Staff make the fact that it is a default rule "express" in the rule itself. AT&T notes further that it would be helpful if the Commission's Annual Report form were altered so as to provide a specific place to include the carriers' standard as required under the statute. The form currently lacks any

direction as to the appropriate place that such standard should be described. And in fact, the form as set-up is not currently conducive to containing such a standard.

Likewise, AT&T is not opposed to the P.01 standard for final trunk group blocking that Staff proposes, but notes that Staff did not address AT&T's primary concern expressed as follows in its Initial Comments, namely that:

the proposed service standards assume that carriers segregate inter and intra state toll traffic such that trunk blocking, for example, can be measured insofar as it relates only to intrastate toll service. In general, this is not the case in AT&T's network and AT&T is unaware of any other carriers segregating toll traffic in the way Staff contemplates by its proposed rules. 2

As the Commission is well aware, its jurisdiction is limited to intrastate toll traffic. Staff's has not addressed that problem with its standard and the fact that carriers cannot generally segregate out *inter* from *intra* state toll traffic. This makes the blocking standard, by default, a toll traffic standard that is broader than the Commission's jurisdiction.

Moreover, it does not appear that Staff really addressed the competitive nature of this service, although it did mention it in passing in its Reply.³ That said, however, AT&T would like to ensure that Staff is not suggesting that the Commission has broader jurisdiction than it does; nor that Staff is recommending that the carriers should have to create separate trunk groups to carrier *inter* and *intra* state toll traffic just to comply with the proposed standard.

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¹ OAR 860-023-0054(3).

² AT&T's Initial Comment at 2.

³ Staff Reply Comments at 1.

Otherwise, AT&T concurs in the additional modifications Staff proposes, and takes no issue with any other carriers' initial comments in relation to the proposed standard.

Respectfully submitted this 20th day of May, 2005.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC.

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CERTIFICATE OF SERVICE

I hereby certify that I sent an original and five copies of AT&T's Reply Comments in Docket No. AR 493 via overnight delivery and a copy via electronic mail this 20th day of May, 2005, to:

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and a true and correct copy was sent via electronic mail this 20th day of May 2005, to:

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