

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER SMITH
COMMISSIONER REDFORD
COMMISSION SECRETARY
LEGAL
WORKING FILE

FROM: CAROLEE HALL

DATE: JUNE 11, 2007

RE: AT&T MOBILITY'S REQUEST FOR A WAIVER OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO'S
SANDPOINT RATE CENTER IN CASE NO. ATT-T-07-01.

BACKGROUND

On May 29, 2007, AT&T Mobility (formerly known as Cingular Wireless and Blue License Holding) filed a request for a waiver of numbering resource guidelines following denial of its Application filed with Neustar, the North American Numbering Plan Administrator (NANPA). According to its Application, on May 2, 2007 Blue Licenses Holding requested 1000 additional numbers in the Sandpoint Rate Center.

On or about May 2, 2007, AT&T submitted an automated Part 1A and MTE (Months to Exhaust) worksheet to Neustar to obtain numbering resources necessary to meet the demands of its customers in the Sandpoint calling region. The reason for the denial was based upon AT&T's utilization calculation of 67.311 percent, which is below the required 75 percent for Idaho.

STAFF ANALYSIS

During its analysis staff contacted AT&T Mobility regarding a discrepancy in the Public Administrator's Report of assigned numbers and usage of those numbers. The Company responded that it currently has two thousand numbers in the Sandpoint Rate Center reserved for Administrative Global Title Translations, thereby leaving 372 numbers available for customer assignment. Staff contacted Neustar regarding this matter and was told that it may be reasonable to reserve two thousand numbers for the type of network architecture that AT&T Mobility is

currently deploying. If the two thousand reserve numbers were to be removed from the percent in use calculation, then AT&T Mobility would meet the 75% utilization requirement.

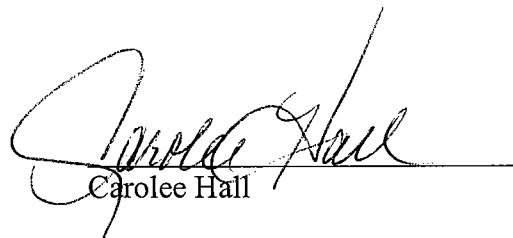
AT&T participates in the thousand-block-pooling in the Sandpoint rate center. Methods such as pooling and rate center consolidation help make number conservation efforts more effective, and are designed to extend the time it takes to exhaust (MTE) a rate center's number resources. After evaluating AT&T's responses to Staff's inquiries, staff does not believe that granting this requested waiver will result in an inefficient use of Idaho's numbering resources at this time. According to FCC orders and numbering guidelines, carriers may appeal NANPA decisions of this nature to the appropriate state regulatory authority. The Commission has granted similar waivers in the past to meet the requests of larger customers. (See Order Nos. 28769 and 29279).

RECOMMENDATION

Staff recommends that the request for one thousands-block to AT&T Mobility be granted so that the Company can service the needs of its Sandpoint customers. Staff also recommends that AT&T Mobility continue to follow FCC numbering guidelines by assigning numbers as demand requires within the specific assigned prefix area of Idaho only. Further, Staff recommends that AT&T be reminded that unused 1,000 blocks will be returned to the NANPA within six months.

COMMISSION DECISION

Should the request for waiver from AT&T Mobility be granted?



Carolee Hall