

**MORGENSTERN, DALE C, ATTOPS**

---

**From:** MORGENSTERN, DALE C, ATTOPS  
**Sent:** Thursday, May 24, 2007 5:10 PM  
**To:** 'carolee.hall@puc.idaho.gov'  
**Subject:** Sandpoint Safety Valve

2007 JUN 12 2:10:09  
MAILS  
MAILS

**Attachments:** Sandpoint.doc; Sandpoint Safety Valve MTE data 5-1-07.xls; Sandpoint PAS MTE.pdf; Sandpoint Rejection 2007.pdf



Sandpoint.doc (57 KB)



Sandpoint Safety Valve MTE dat...



Sandpoint PAS MTE.pdf (49 KB)



Sandpoint Rejection 2007.pdf (...)

Att-t-07-01

Carolee:

Let me introduce myself. I am with the new AT&T, responsible for interfacing with the Commissions wrt safety valves and other numbering and 911 issues. In the legacy AT&T I had a similar function.

The above data, however, is a safety valve for Cingular. It is my 1st one, so please be patient. I am including the request, MTE data for Sandpoint and the PAS output. Please feel free to call me if additional information is needed.

*Dale Morgenstern*  
**Dale Morgenstern** 6/14/07  
**Network Regulatory**

o: 908-234-5120  
c: 201-960-6668  
f: 908-532-1413



2007 JUN -7 AM 11:45  
IDAHO PUBLIC  
UTILITIES COMMISSION

June 7, 2007

ATT-07-01

**Via Electronic Mail**

Ms. Carolee Hall  
Idaho Public Utilities Commission  
472 West Washington  
Boise, Idaho 83702-5983

RE: AT&T Mobility Safety Valve Request for Sandpoint Rate Center  
**Confidentiality Requested**

Dear Ms. Hall:

AT&T Mobility (formerly known as Cingular Wireless and Blue License Holding) respectfully requests that the Idaho Public Utilities Commission ("Commission") grant an immediate and expedited safety valve request to AT&T Mobility for additional numbering resources for the Sandpoint rate center. AT&T Mobility applied for a thousands-block from the Pooling Administrator ("PA") but was denied as it did not meet the required utilization rate of seventy-five (75) percent. Attached is a copy of the PA denial. Due to unique circumstances described in more detail below, AT&T Mobility requires a thousands-block immediately for the Sandpoint Rate Center so that it can continue to provide service to new customers in that area.

**The Idaho Commission Should Grant AT&T Mobility's Safety Valve Request for Additional Numbering Resources in the Sandpoint Rate Center**

In contemplation of unique situations such as this, the Federal Communications Commission ("FCC") in its 3<sup>rd</sup> NRO<sup>1</sup> instituted a safety valve mechanism and delegated authority to state commissions to grant such requests. As set forth by the FCC in the 3<sup>rd</sup> NRO, states can direct the PA to assign additional numbering resources to carriers that have demonstrated a verifiable need for additional numbering resources if the carrier will exhaust its numbering resources within three months and projected growth for the rate center is based on actual or projected growth, but only if that projected growth varies no

---

<sup>1</sup> See In the Matter of Number Resource Optimization, Third Report and Order ("3<sup>rd</sup> NRO"), CC Docket No. 99-200, (rel. Dec. 28, 2001), paragraphs 61-66.

more than fifteen percent (15%) from historical growth.<sup>2</sup> AT&T Mobility submits the following information demonstrating its need for additional numbering resources in the Sandpoint rate center.

AT&T Mobility does not meet the seventy-five percent (75%) utilization rate to qualify for additional numbering resources in the Sandpoint rate center due to two factors: 1) AT&T Mobility does not have many numbers in this rate center, and 2) AT&T Mobility needs to use two (2) thousands-blocks in this rate center as administrative numbers. As described in the attachment, of the nine thousands-blocks, AT&T Mobility has in this rate center, six thousand fifty eight (6058) numbers are assigned, two thousand (2,000) numbers are administrative and three hundred seventy two (372) numbers are available for assignment for a utilization factor of 67.311%. As described in the attached spreadsheet, based on AT&T Mobility's projected growth in this rate center AT&T Mobility anticipates that it will exhaust before the three month requirement as set forth by the FCC for safety valve requests.

The two (2) thousands-blocks that are being used as administrative numbers from this rate center have been assigned as E.164 numbers for Global Title Translations. E.164 is an ITU Telecommunications Standardization Sector (UTU-T) recommendation which defines the international public numbering plan used in the public switched telephone network including GSM (and UMTS) transmission technology utilized by AT&T Mobility and other carriers. At its simplest level, E.164 numbers are numbers used as part of a network addressing scheme that allows for the identification of the location of the customer along with the carrier serving that customer.<sup>3</sup> To accomplish this, each switch within AT&T Mobility's network must be assigned at least one E.164 number and the E.164 numbers are announced to our roaming partners both domestically and internationally. Further, these numbers have some geographic significance; as such AT&T Mobility is utilizing the E.164 administrative numbers from the two (2) thousands-blocks in the Sandpoint Rate Center for its switches and other network elements in Idaho as well as California, Oregon, Montana, Nevada, Colorado, Arizona, New Mexico, Idaho, Utah, Wyoming and Washington. Still not clear why 1K are needed?

AT&T Mobility has investigated whether numbers within these two blocks could be released for potential activation to new customers and/or whether it could assign these E.164 numbers from a thousands-block in a different rate center. AT&T Mobility has found that neither of these options is feasible without potentially affecting service and billing to customers. First, due to limitations with data translations in the switches the E.164 administrative numbers should preferably be contiguous. Not clear why? Second, reassigning the E.164 number would cause AT&T Mobility to renumber a large number

---

<sup>2</sup> 3<sup>rd</sup> NRO, paragraph 63

<sup>3</sup> Global title translation is the use of a non-SS7 identifier as a routing address. Global title translation is necessary when the point code of the destination network node is not known, or when the destination is in another country. Analysis of the global title may occur at several STPs or international gateways in the signaling path, until it is finally possible to convert the global title into the destination point code.

of switches. This has the potential of causing switch outages of varying in length from hundreds of minutes to several hours which would impact customers' ability to make or receive calls. Further, these numbers have been "broadcast" to all of our roaming partners both domestically and internationally, so that any changes would need to be re-communicated which can increase the likelihood of errors occurring. The change notice and request has a minimum forty-five (45) day lead time.

### **Conclusion**

For the foregoing reasons, AT&T Mobility believes that the assignment of additional thousand blocks in the Sandpoint rate are in the public interest and the Idaho Commission should direct the PA to assign one (1) thousands-block to AT&T Mobility as soon as possible.

If you have any questions regarding this matter, please contact ...

Sincerely,

Dale C. Morgenstern  
AT&T – Network Regulatory  
O: 908-234-5120  
F: 908-532-1413

Attachments

**ATT-T-07-01**

**THE REMAINING FOUR**

**PAGES ARE**

**CONFIDENTIAL AND**

**WERE NOT SCANNED**