Michael J. Uda
Uda Law Firm, P.C.
7 West 6thAvenue, Suite 4E
Helena, MT 59601
Telephone: (406) 457-5311
Email: mudamthelena.com

DEPARTMENT OF PUBLIC SERVICE REGULATION BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

In the Matter Of Telephone Number REGULATORY DIVISION Conservation DOCKET NO. D2011.10.89

AT&T's NOTICE OF APPEARANCE AND INITIAL COMMENTS

New Cingular Wireless PCS LLC and AT&T Communications of the Mountain

States, Inc. ("AT&T") files this notice of appearance and its intent to participate in the

above-referenced matter, and provides these initial comments in response to this

Commission's notice of Inquiry and Request for Comments involving number

conservation.

1. Mandatory "Thousand-Block" Number Pooling

AT&T supports the use of number pooling in technically feasible situations,

where competition is likely to occur. AT&T believes that in any competitive or potentially

competitive market (or rate center), number pooling may provide number conservation

efficiencies. However, it is also true that number pooling comes at an implementation

cost and no efficiency is gained if deployed in areas that never realize competition.

"Thousand-Block" ("1K") Number Pooling relies on the Local Number Portability

("LNP") database as deployed using the Location Routing Number ("LRN") technology.

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