

NANCY B. WHITE
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
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(305) 347-5558

February 3, 2003

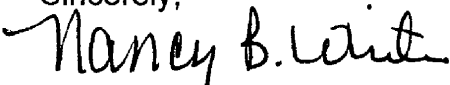
Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No.: 030118-TL
Petition for Expedited Review of Growth Code Denials by the Number
Pooling Administrator for the Palm Coast Exchange

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Expedited Review of NXX-X Code Denial for the Palm Coast Exchange, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (CA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER DATE

01083 FEB-3 8

FPSC-COMMISSION CLERK

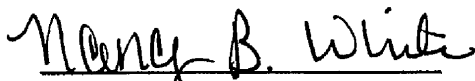
CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials
By the Number Pooling Administrator for the Palm Coast Exchange

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 3rd day of February, 2003 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Thomas Foley
NPA Relief Planner
820 Riverbend Blvd.
Longwood, Florida 32779-2327


Nancy B. White (KLB)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denials by the Number Pooling Administrator)
for the Palm Coast exchange) Filed: February 3, 2003
_____)

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

BellSouth Telecommunications, Inc. (“BellSouth”), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission (“FCC”) Order FCC 00-104, and Florida Public Service Commission (“Commission”) Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NeuStar”) denial of BellSouth’s request for additional numbering resources in the Palm Coast exchange. In support of this petition, BellSouth states:

PARTIES

1. BellSouth is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.

2. NeuStar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources in pooling areas. See 47 C.F.R. § 52.20(d).

JURISDICTION

3. The Commission has jurisdiction of this matter pursuant to Industry Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This

provision provides that a carrier may challenge NeuStar's decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. On March 31, 2000, the FCC issued Order No. 00-104 ("FCC 00-104" or the "Order") in the Numbering Resource Optimization docket (Docket No. 99-200). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of telephone numbers and to avoid further exhaustion of telephone numbers under the NANP.

5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier's need for numbering resources by requiring rate center based utilization rates to be reported to North American Numbering Plan Administrator ("NANPA"). FCC Order at § 105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing numbering inventory within the applicant's rate center will be exhausted within six months of the application. Prior to the ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant's existing number inventory within the applicant's serving switch to exhaust within a specific months-to-exhaust ("MTE") of the code application in order for a code to be assigned or for the carrier to prove that it was unable to meet a specific customer's request with its current inventory of numbers. The FCC stated that the shift to a "rate center" basis for determining the need for new numbering resources was intended to "more accurately reflect how numbering resources are assigned" and to allow "carriers to obtain numbering resources in response to specific customer demands." FCC Order at ¶ 105.

6. On December 29, 2000, the FCC also released FCC 00-429, which reaffirmed FCC 00-104 and also required carriers to also meet a 60 percent initial utilization threshold. FCC 00-429 at ¶ 26. Based on these two FCC orders, carriers are required to meet a six MTE criteria as well as a utilization threshold on a rate center/exchange basis in order to be granted additional numbering resources. Id. at ¶ 29.

7. In FCC 00-104, the FCC directed the industry and the Pooling Administrator to comply with the INC Pooling Guidelines. FCC 11-104 ¶183. Pursuant to the INC Guidelines, in order to obtain thousand-block allocations, the carrier must demonstrate that its existing numbering resources for the rate center will exhaust within six (6) months and also have a utilization of 60 percent for the specific rate center. See INC Guidelines Section 4.3(d) and Appendix 3. These requirements are known as the six (6) months-to-exhaust (“MTE”) and utilization threshold.

8. Since the beginning of this year, BellSouth has submitted several requests for additional numbering resources to North American Numbering Plan Administrator (“NANPA”) and NeuStar for assignment of additional numbering resources to meet the demands of its customers in several Florida exchanges, including Daytona Beach, DeLand, Ft. Lauderdale, Jacksonville, Miami, North Dade, Orlando, Palm Coast, and West Palm Beach.

9. BellSouth has completed these applications in accordance with INC guidelines and filled out the necessary Months-to-Exhaust and Utilization Certification Worksheets as required.

10. BellSouth has utilized mechanisms such as number pooling to manage its numbering resources in the most efficient manner. However, as the Commission is well

aware, in some circumstances, BellSouth has been required to petition the Commission for relief.

11. On May 25, 2001, BellSouth petitioned the Commission to develop an expedited process to review NANPA's denial of a request for additional numbering resources to minimize the delay carrier's experience in attempting to challenge a denial by NANPA. As a result of the BellSouth's Petition and the Commission's efforts to make numbering resources available to carriers, the Commission issued Order No. PSC-01-1873-PCO-TL setting forth an expedited code denial process for non-pooling areas. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

12. The Palm Coast exchange consists of one central office and one switching entity that utilizes numbering resources: Palm Coast (PLCSFLMADS0).

13. On January 6, 2003, BellSouth requested additional numbering resources from NeuStar for the Palm Coast switch. See Attachment 1. Specifically, BellSouth requested five 1,000 consecutive number blocks in order to meet the customer's dialing plan. Since BellSouth was able to meet the MTE for one of the blocks, BellSouth is only requesting the Commission require NeuStar to provide four additional 1,000 blocks.

14. At the time of the code request, the Palm Coast exchange had a MTE of 7.4-15.1 and a utilization of 83.19%.

15. On January 6, 2003, NeuStar denied BellSouth's request for additional numbering resources because BellSouth had not met the rate center based MTE criteria, notwithstanding the fact that BellSouth is unable to provide the numbering resources

requested by the specific customer. See Attachment 2. Attached to this Petition is the customer contact information. See Attachment 3.

16. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).

17. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar nor NANPA looks at the number of MTE and utilization for the entire rate center without exception. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

18. BellSouth requests that the Commission's reverse NeuStar's decision to withhold numbering resources from BellSouth on the following grounds:

(a) NeuStar's denial of numbering resources to BellSouth interferes with BellSouth's ability to serve its customers within the State of Florida.

(b) The MTE at the rate center level requirement is discriminatory against the incumbent LEC, since the ILEC is typically the only local service provider with multiple switches in a rate center. The ILEC deploys multiple switches in a rate center in order to meet customer demand for telephone service. The new FCC rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying

multiple switches. BellSouth believes that it is patently unfair to require that the ILEC only get six (6) MTE in all the switches it has deployed in a rate center, when the ALECs, which have recently entered the local service market, have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

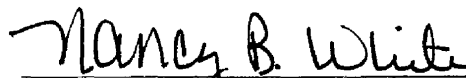
(c) As a result of NeuStar's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the Palm Coast exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Palm Coast exchange as discussed above.

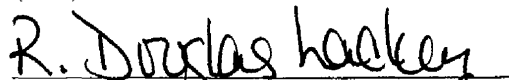
Respectfully submitted this 3rd day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



Nancy B. White (LA)

James Meza III
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558



R. Douglas Lackey (LA)
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0747

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Sign Out

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile

Block Applicant :

Company Name _____
 Headquarters Address* 675 WEST PEACHTREE ST NE
 City* ATLANTA
 State* GA
 Zip* 30375

Contact Name _____
 Contact Address _____
 City _____ State _____
 Zip _____
 Telephone _____ Fax _____
 E-mail _____

Pooling Administrator :

Contact Name Mr Gary Zahn
 Contact Address 1800 Sutter St. Ste. 780
 City Concord
 Zip 94520
 Telephone 9253638753
 State CA
 Fax 9253637688

NEUSTAR

- Request For Resources
- Modify
- Disconnect
- Block Transfer
- Confirm Block(s) In Service (Part 4)
- Search Forms
- Submit Forecast
- Create/Modify Forecast
- User Profile
- Donate Blocks
- Reports

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LRN Needed No

NPA 386 LATA* 456
 OCN 9417-BELLSOUTH SO BELL
 AOCN* 9400 Parent Company OCN* 9417

Number of Thousands-Blocks Requested 5

Switch Identification (Switching Identity/PCI)* olcsafmds0
 City or Wire Center Name Palm Coast
 Rate Center PALM COAST Rate Center Sub Zone

1.3 Dates

Date of Application Monday, January 6, 2003
 Requested Block Effective Date 22 Feb 2003
 Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider* Incumbent Local Exchange Carrier (ILEC)
 b) Primary type of service Blocks to be used for* Wireline

7 c) Thousands-Block(s) (NPA-NXX-X) assignment preference
 Click here to see the available blocks in the pool.


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| | |
|---|--------|
| | Delete |
| d) Thousands-Block(s) (NPA-NXX-0) that are undesirable for this assumption if any | 333 |
| | Delete |

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A


1.5 Type of Request

Initial block for rate center Yes
 Growth block for rate center Yes
 Change block *N/A*
 Disconnect block *N/A*

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Polling Administration Guidelines INC 99-0127-023

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Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Monday, January 6, 2003**
 OCN **9417**

Company Name
 Rate Center **PALM COAST**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)

386-246-3/6, 386-445, 386-446, 386-447


1 **2051097**

Name of Block Applicant **[REDACTED]**
 Title **[REDACTED]**
 Telephone Number **[REDACTED]**
 Fax Number **[REDACTED]**
 E-Mail **[REDACTED]**

A Available Numbers **[REDACTED]**
 B Assigned Numbers **[REDACTED]**
 8 C Total Numbering Resources **[REDACTED]**
 9 D Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation **[REDACTED]**

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E. Growth History - Previous 6 months^{2*}

| | | | | |
|-------------|---------|--|---------|--|
| 1 2 3 | Month 1 | | Month 2 | |
| | Month 3 | | Month 4 | |
| | Month 5 | | Month 6 | |

F Forecast - Next 12 months^{3*}

| | | | | |
|--|----------|--|----------|--|
| 4 5 6 7 8 9 10 11 12 | Month 1 | | Month 2 | |
| | Month 3 | | Month 4 | |
| | Month 5 | | Month 6 | |
| | Month 7 | | Month 8 | |
| | Month 9 | | Month 10 | |
| | Month 11 | | Month 12 | |


G Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) [REDACTED]

H Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

| Block Requested | A. Available Numbers | H. Months to Exhaust |
|-----------------|----------------------|----------------------|
| 1 | | |
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |

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G Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) [REDACTED]

H Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

| Block Requested | A. Available Numbers | H. Months to Exhaust |
|-----------------|----------------------|----------------------|
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |

I Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 83.165

100

Explanation

CUSTOMER HAS TO HAVE SPECIFIC NUMBER RANGES FOR DIALING PLAN.

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
2. Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months (FCC 00-104, § 52.15 (g)(3)(ii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii)).

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(If request is for Activation the thousand-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee; donating switch information, the PA will fill in those three fields. For a Modification request, the requestor is to provide all information.)

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Pooling Administrator:

Name: Mr Gary Zahn
 Address: 1800 Sutter St. Ste. 700
 City: Concord
 Zip: 94520
 E-mail: gary.zahn@neustar.biz

State: CA
 Phone: 9253638753
 Fax: 9253637688

Block Applicant:

Company Name: [REDACTED]
 Contact Name: [REDACTED]
 Address: [REDACTED]
 City: [REDACTED]
 Zip: [REDACTED]
 E-mail: [REDACTED]

State: [REDACTED]
 Phone: [REDACTED]
 Fax: [REDACTED]

Service Provider NPAC SOA SPID: 9417
 LRN: 3864450000

Remarks: [REDACTED]

Block (K) Range: [REDACTED]
 Block Effective Date: [REDACTED]
 Is Block being allocated back to LERG Assignee on donating switch? [REDACTED]
 NPAC Activate Block Range Yes [REDACTED]

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Pooling Administration System

spoei (SP) Sign Out

Part 1B (Continued)

Section B

| | |
|-----------------|-----------|
| Class DPC | 252040150 |
| Class SSN | 000 |
| LIDB DPC | 252202253 |
| LIDB SSN | 000 |
| CNAM DPC | 252202232 |
| CNAM SSN | 000 |
| ISVM DPC | 252040150 |
| ISVM SSN | 000 |
| WSMGC DPC | |
| WSMGC SSN | |
| SOA Origination | |

Submit Cancel

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spoor (SP) Sign Out

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Your request has been successfully submitted
The Tracking Number for this request is: 386-PALM COAST-FL-100623

[Return to Home](#)

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spoeer (SP) Sign Out


Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months

Select One Option and Submit



- Proceed on the basis of the existing MTE and receive only **1 block(s)**
- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part IA
- State Waiver Option





- Request For Resources
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Date:  Time: 

Customer Contact Information

