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March 21, 2003

030290-TL

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

Re: [REDACTED] REQUEST FOR NUMBERS

Dear Ms. Bayo:

In accordance with the expedited process established in order PSC-01-1973-PCO-TL (Docket No. 010782-TL), Verizon Florida Inc. (Verizon) requests the Florida Public Service Commission to direct the Pooling Administrator (PA) to provide Verizon with a new prefix of [REDACTED] telephone numbers in a [REDACTED] block for [REDACTED] in St. Petersburg, Florida.

Verizon considers the highlighted information in this letter to be confidential because it contains the customer's name and the customer's planned use of the requested numbers. Verizon is obligated to protect the identity of the customer and competitors could use this information to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the highlighted information must be kept confidential until returned to Verizon. To assist the Commission in processing this request, the name of the customer who initiated the request is Mr. [REDACTED]. Mr. [REDACTED] can be reached at [REDACTED].

[REDACTED], a Verizon customer, has requested a [REDACTED] telephone numbers for their new national headquarters. This specific request of [REDACTED] numbers will allow [REDACTED] to unify the numbers that they now have spread across several exchanges and better support their business needs.

On or about March 7, 2003 Verizon submitted a Code Request Application Form Part 1A to the PA for the assignment of [REDACTED] necessary to meet the [REDACTED] request. A copy of this application is included as Attachment A. Verizon completed the application in accordance with the Thousands - Block Number (NXX-X) Pooling Administration

DOCUMENT NUMBER-DATE

02761 MAR 21 8

REDACTED

FPSC-COMMISSION CLERK

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 02763-03. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

Ms. Blanca S. Bayo, Director
March 21, 2003
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Guidelines and completed the necessary Months to Exhaust Certification, which is included as Attachment B.

Verizon submitted the request for a new block because Verizon does not have _____ sequential numbers available within the Gandy central office to meet _____ needs. Although the Gandy office is in the multi-switch rate center of St Petersburg, Verizon does not have available numbers in its existing inventory from another switch within the rate center to satisfy the request.

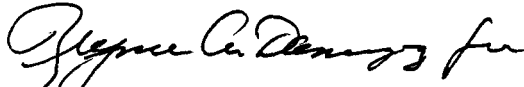
On or about March 10, 2003, the PA, via the Pooling Administration System (PAS), denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria set forth in the Thousands – Block Number (NXX-X) Pooling Administration Guidelines, notwithstanding the fact that Verizon does not have the numbering resources needed to satisfy its customer's demand in the switch at issue. This decision, provided by the PAS system, is included as Attachment C.

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, the PA looks at the number of months to exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket states that a carrier "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Also, paragraph 64 indicates that "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." The Florida Commission thus has the authority to review the PA's decisions and reverse them when appropriate.

Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need, and the PA's denial of numbering resources interferes with Verizon's ability to serve this customer.

Verizon requests that the Commission instruct the PA to release the numbering resources necessary to meet the needs of _____. Please do not hesitate to call me if you have any questions.

Sincerely,



Michelle A. Robinson
Assistant Vice President
Regulatory Affairs Florida

MAR:hr
Attachments

REDACTED

Tracking Number: _____

Attachment A

Thousands-Block Application Form
Part 1A

Type of Application: (Check one) New Change¹ Delete

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: VERIZON
Contact Name: ALICE JACKSON
Address: 2094 MCGEE LANE
City, State, Zip: LEWISVILLE, TX 75077
Phone: 9723185334 Fax: 972-317-2161
E-Mail: ALICE.JACKSON@VERIZON.COM

Pooling Administrator²:

Contact Name: Gary Zahn
Address: 1800 SUTTER STREET SUITE 570
City, State, Zip: CONCORD, CA 94520
Phone: 925-363-8753 Fax: 925-363-7688
E-Mail: gary.zahn@neustar.com

1.2 General Information

1.2A Required when a thousands-block is needed for an LRN

This section applies if the applicant is requesting a thousands-block for an LRN which will make the applicant the LERG Assignee. The LERG Assignee responsibilities are listed in Section 4.2 of the Thousands-Block (NXX-X) Number Pooling Administration Guidelines (INC 99-0127-023).

NPA: _____ LATA: _____ OCN³: _____ AOCN: _____
Number of Thousands-Blocks Requested: _____ Number of Full NXXs Requested: _____

Switch Identification (Switching Entity/POI)⁴: _____ City or Wire Center Name: _____
Rate Center⁵: _____ Rate Center Sub Zone: _____
Homing Tandem Operating Company⁶: _____ Tandem Homing CLLI^{TM7}: _____
Route same as NPA _____ NXX-X _____ Use Same Rate Center as NPA _____ NXX _____

1.2B Required when no LRN is needed

NPA: 727 LATA: 952 OCN: 0328 AOCN: 0772
Number of Thousands-Blocks Requested: _____ Number of Full NXXs Requested: 0

Rate Center: STPETERSBG
Switch Identification (switching Entity/POI)⁸: GNDYFLXA57H

1.3 Dates

Date of Application⁹: 03/07/2003 Requested Block Effective Date: 05/12/2003
Request Expedited Treatment? (See Section 9.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)
- b) Type of service: POTS/EOC
- c) Is certification or authorization required? Yes X No _____
If No, explain: _____
- d) Does your company have certification? Yes X No _____

Tracking Number: _____

Attachment A

Thousands-Block Application Form
Part 1A

i) If yes, what type? TARIFF (regulatory authorization, license, tariff, etc)

ii) If no, explain: _____

e) Thousands-Block(s) (NXX-X) assignment preference (optional) _____

f) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any _____

1.5 Type of Request (Initial, new application for existing switch, growth, update, reservation¹⁰, etc.) Need and entire NXX for customer request.

1.6 Type of and Reason For Change: _____

1.7 If this Thousands-Block request is for a new application for an existing switch, please explain:¹¹

1.8 Do NPA Jeopardy Criteria Apply? Yes No X

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) Number Pooling Administration Guidelines INC 99-0127-023

<u>Alvin Jackson</u>	<u>SPECIALIST - SERV INV</u>	<u>03/07/2003</u>
Signature of Block Applicant	Title	Date

Tracking Number: _____

Attachment A

Thousands-Block Application Form
Part 1A

¹ Identify type of and reason for change(s) in Section 1.6.

² The Pooling Administrator is available to assist in completing these forms.

³ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (973-884-8249) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to Telcordia Technologies Traffic Routing Administration (TRA)(732-699-6700).

⁴ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the *CLLI Location Identification Code* of the switch /POI.

⁵ Rate Center name must be a tariffed Rate Center.

⁶ Applies to Type 2A wireless, competitive local exchange carriers, or any Block Holder connecting to a Public Switched Telephone Network (PSTN) interconnecting carrier.

⁷ *CLLI*TM code of PSTN interconnecting carrier switch/POI.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the *CLLI Location Identification Code* of the switch /POI.

⁹ Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

¹⁰ When the applicant is ready to place the thousands-block in service, they should complete a new request form.

¹¹ If eligibility is based on a category that requires additional explanation or documentation and the Pooling Administrator denies a request, the applicant has the option to pursue an appeals process. Any additional information that can be provided by the applicant may facilitate the processing of the application.

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Requests for Additional Codes for Growth)

Date: 03/18/03 Company Name: VERIZON

Rate Center: STPETERSBG

NPA(s)-NXXs included in growth calculation²: 727-217 227 299 302 319 320 321 322 323 327 328 341 343 344 345 346 347 360 363 367 368 381 384 391 392 393 394
395 397 398 399 502 520 521 522 525 526 527 528 537 540 541 544 545 546 547 548 549 550 551 552 553 556 557 561 563 564 566 567 568 570 571 -572 573 574
575 576 577 578 579 592 767 768 820 821 822 823 824 825 826 827 864 865 866 867 872 892 893 894 895 896 897 898 906

Signature of Authorized Representative of Code Applicant: _____

Title: SPECIALIST - SERV INV Telephone No.: 9723185334 FAX No.: 972-317-2161

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 154260

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
B. Previous 6-month growth history ⁴	<u>-4468</u>	<u>100206</u>	<u>826</u>	<u>-2667</u>	<u>-10719</u>	<u>1140</u>						
C. Forecast – Next months 1-12 ⁵	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>	<u>7038</u>
D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): <u>7038</u>												
E. Months to Exhaust ⁶ =	<u>Telephone Numbers (TNs) Available for Assignment (A)</u>						=	<u>22</u>				
								<u>Average Monthly Forecast (D)</u>				
F. Utilization Level ⁷ =	<u>Telephone Numbers (TNs) Assigned</u>						X 100	<u>= 73%</u>				
	<u>Total Numbering Resources in Applicant's Inventory</u>											

Explanation:

¹ A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

² Report on all resources for the requested geographic area, including newly acquired codes.

³ Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴ 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.

⁵ Forecast of TNs needed in each following month, starting with the most recent month as Month #1. In a jeopardy situation, only 6 months growth projection is required.

⁶ To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

⁷ Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

Pooling Administration System - Netscape

File Edit View Go Communicator Help

Back Forward Reload Home Search Netscape Print Security Shop Stop

Bookmarks Location http://www.nationalpooling.com/pas/frames-index.jsp

Request For Resources

- New
- Modify
- Disconnect
- Block Transfer

Confirm Block(s) in Service (Part 1)

- Search Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports

Question? E-mail us
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Pooling Administration System

jgardner (SP) Sign Out

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

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Request for additional Code in St Petersburg, Fl.