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ORIGINAL



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COMMISSION CLERK

August 23, 2004

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

040926-TL

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 two uncontaminated 1,000 number blocks for [REDACTED] in Tampa, 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] 1,000 blocks of telephone numbers to meet its dialing plan requirements. This request is necessary since the numbers originally assigned to DTCC were not compatible with the customer's PABX numbering plan. The customer requires a range of DID numbers beginning with the digits 1, 2, 4, 5 or 8 in order to be compatible with their existing dialing plan.

On August 16, 2004 Verizon submitted a Code Request Application Form Part 1A to the PA for the assignment of [REDACTED] 1,000 blocks of numbers necessary to meet the [REDACTED] request. Verizon completed the application in accordance with the Thousands - Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust Certification. A copy of this application is included as Attachment A.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 09220-04. 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.

REDACTED

DOCUMENT NUMBER-DATE

09219 AUG 23 3

FPSC-COMMISSION CLERK

- CMP \_\_\_\_\_
  - COM \_\_\_\_\_
  - CTR \_\_\_\_\_
  - ECR \_\_\_\_\_
  - GCL 1 \_\_\_\_\_
  - OPC \_\_\_\_\_
  - MMS \_\_\_\_\_
  - RCA \_\_\_\_\_
  - SCR \_\_\_\_\_
  - SEC 1 \_\_\_\_\_
  - OTH 1 conx \_\_\_\_\_
- recor

Verizon submitted the request because Verizon does not have [REDACTED] sequential numbers available within the Tampa Central central office to meet the [REDACTED] needs.

On August 18, 2004, the PA, via the Pooling Administration System (PAS), denied Verizon's request. This decision, provided by the PAS system, is included as Attachment B.

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 the [REDACTED].

Please call Joan Gage on 813-483-2530 if you have any questions.

Sincerely,



David M. Christian  
Vice President  
Regulatory Affairs Florida

Attachments

REDACTED

Tracking Number: \_\_\_\_\_ Attachment 1 – Modified September 24, 2001  
Thousand Block Application Form  
Part 1A

Type of Application: (Check one)      New       Change \_\_\_\_\_      Delete \_\_\_\_\_

Request ID #    348784

**GENERAL APPLICATION INFORMATION**

**1.1 Contact Information:**

**Block Applicant:**

Company Name:    0328 - VERIZON FLORIDA INC.  
Headquarters Address:    1 E. Pratt St. Baltimore, MD 21202  
Contact Name:    Carol Ottersen  
Address:    741 Zeckendorf Blvd Room 0407  
City, State, Zip:    Garden City, NY 11530  
Phone:    516-832-5773      Fax:    516-683-4843  
E-Mail:    carol.a.ottersen@verizon.com

**Pool Administrator:**

Contact Name:    Gary Zahn  
Address:    1800 Sutter St. Suite 570  
City, State, Zip:    Concord, CA 94520  
Phone:    925-363-8753      Fax:    925-363-8761  
E-Mail:    gary.zahn@neustar.com

**1.2 General Information**

Check one: No LRN needed \_\_\_\_\_  \_\_\_\_\_      LRN needed \_\_\_\_\_

NPA:    813    LATA:    952      OCN:    0328      AOCN:    \_\_\_\_\_      Parent Company's OCN:  
Number of Thousand Blocks Requested:    2

Switch Identification (Switching Entity/POI):    UNVRFLXA97H      City or Wire Center Name:  
Rate Center:    TAMPA CENTRAL      Rate Center Sub Zone:

**1.3 Dates**

Date of Application:    08/16/2004      Requested Block Effective Date:    09/13/2004  
Request Expedited Treatment? (See Section 8.6):    Yes \_\_\_\_\_ No \_\_\_\_\_

**1.4 Type of Service Provider Requesting the Thousand Block:**

- a) Type of Service Provider:    LEC      (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for:    ICO
- c) Thousand Block(s) (NXX-X) assignment preference (optional)  
      813-XXX-1XXX, 2XXX, 4XXX, 5XXX OR 8XXX
- d) Thousand Block(s) (NXX-X) that are undesirable for this assignment, if any  
      ALL EXCEPT ABOVE
- e) If requesting a code for LRN purposes, indicate which blocks(s) you will be keeping (the remainder of the blocks will be given to the pool) \_\_\_\_\_

**1.5 Type of Request**

Tracking Number: \_\_\_\_\_

Attachment 1 – Modified September 24, 2001  
Thousand Block Application Form  
Part 1A

Initial block for rate center: Yes \_\_\_\_\_, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days.

Growth block for rate center: Yes , If Yes, attach months to exhaust worksheet.

Change block: Yes \_\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:  
\_\_\_\_\_

Disconnect block: Yes  If Yes, list NPA-NXX-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 Thousand Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

Carol

Ottersen

Signature of Block Applicant

Code Administrator

Title

08/16/2004

Date

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Tracking Number: \_\_\_\_\_

Attachment 2  
March 4, 2002

**Thousands- Block Application Form  
Part 1B**

**NPAC BLOCK HOLDER DATA**

(Submit one form per thousands- block request)

Request ID #: **348784**

<b>Activation Request:</b>	<input checked="" type="checkbox"/>	<b>Intra SP Block Porting Request:</b>	<input type="checkbox"/>
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Or

<b>Modification Request:</b>	<input type="checkbox"/>	<b>For Information Only:</b>	<input type="checkbox"/>
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**Section A:**

(If request is for Activation, the thousands-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 or Intra SP Block Porting Request, the requestor is to provide all information.)

Pooling Administrator

Name: **Gary Zahn**

Address: **1800 Sutter St. Suite 570**

City, State ZIP: **Concord, CA 94520**

Phone: **925-363-8753**

Fax: **925-363-8761**

E-Mail: **gary.zahn@neustar.com**

Block Applicant

Company Name: **0328 - VERIZON FLORIDA INC.**

Contact Name: **Carol Ottersen**

Address: **741 Zeckendorf Blvd Room 0407**

City, State, ZIP: **Garden City, NY 11530**

Phone: **516-832-5773**

Fax: **516-683-4843**

E-Mail: **carol.a.ottersen@verizon.com**

Service Provider NPAC SOA SPID<sup>1</sup>: **0772**

LRN<sup>2</sup>: **813-615-1958**

Block (1K) Range<sup>3</sup> \_\_\_\_\_

Block Effective Date (MMDDYYYY)<sup>4</sup> \_\_\_\_\_

Is Block being allocated back to the LERG Assignee on the donating switch? Yes  No

If Yes, do not send Part 1B to the NPAC. If No, forward Part 1B to the NPAC.

NPAC Activate Block Range<sup>5</sup>

Yes  No

**Section B:**

(Block Applicant to provide this data **ONLY** if NPAC Activate Block Range is marked 'YES') For Intra SP Block Porting the Block Holder should reflect the routing information of the switch the block is being transferred to.)

Class DPC <sup>6</sup>	<b>240-255-220</b>
Class SSN <sup>7</sup>	<b>0 0 0</b>
LIDB DPC <sup>8</sup>	<b>240-255-220</b>
LIDB SSN <sup>9</sup>	<b>0 0 0</b>
CNAM DPC <sup>10</sup>	<b>240-255-220</b>
CNAM SSN <sup>11</sup>	<b>0 0 0</b>
ISVM DPC <sup>12</sup>	<b>NotSuprtd</b>
ISVM SSN <sup>13</sup>	<b>NotSuprtd</b>
WSMSC DPC <sup>14</sup>	<b>N/A</b>

Tracking Number: \_\_\_\_\_

Attachment 2  
March 4, 2002

### Thousands- Block Application Form Part 1B

WSMSC SSN<sup>15</sup>  
SOA Origination

N/A  
N/A

**Section C:**

(To be filled out by the SP for Intra SP Block Porting)

To be completed if using 2.0

New SPID: \_\_\_\_\_

New LRN: \_\_\_\_\_

To be completed if using 3.0 or higher

New LRN: \_\_\_\_\_

Do you want the BCD record updated? Y \_\_\_ N X

**Section D:**

(NPAC is to Activate/Modify the Block (1K), as indicated on this form. When the Block (1K) Activation/Modification is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pool Administrator and Block Holder.)

Block (1K) Request Complete	Yes ___ No ___
Complete Date (MMDDYYYY)	___/___/___
Complete Time (HHMM)	___/___
NPAC Personnel performing change	_____

Block Holder sent Completed Form: Yes \_\_\_ No \_\_\_

Mailed Date (MMDDYYYY) \_\_\_/\_\_\_/\_\_\_

Mailed Time (HHMM) \_\_\_/\_\_\_

Contact Name \_\_\_\_\_

Pool Administrator sent Completed Form: Yes \_\_\_ No \_\_\_

Mailed Date (MMDDYYYY) \_\_\_/\_\_\_/\_\_\_

Mailed Time (HHMM) \_\_\_/\_\_\_

Contact Name \_\_\_\_\_

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Notes:

- 1) The requesting Block Applicant shall complete this form except for Block Range and Block Effective Date, when submitting PART 1 of the INC Thousands Block Applicant form to the Pool Administrator. A separate Part 1B form is to be completed for each 1K Block Range requested.
- 2) The Pool Administrator will insert Block Range and Block Effective Date information, then submit this form to the regional NPAC at the same time PART 3 of the INC Thousands-Block Applicant form is returned to the requesting Block Applicant.
- 3) Pre- Block Activation:
  - a) If the Block Holder is requesting a modification, the Block Holder needs to complete Sections A and any applicable data in Section B of this form and send it to the Pooling

**Thousands- Block Application Form  
Part 1B**

Administrator (PA). The PA will review the form to insure correctness and forward it to the NPAC for processing.

- b) If the Pooling Administrator (PA) is requesting the modification or intra SP block porting to the Block Range and/or Effective Date, the PA will review the change with the Block Holder. After receiving concurrence from the Block Holder, the PA will update the Block Range and/or Block Effective Date information on Section A and forward it to the NPAC for processing.
- 4) Post- Block Activation: If Block Holder requests NPAC to perform the Block Modification, then Sections A & B of this form should be completed and send to the Pooling Administrator. The Pooling Administrator will send the information on to the NPAC. Upon completion of this request, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.

**Thousands- Block Application Form  
Part 1B**Foot Notes:

<sup>1</sup> The Service Provider ID of the block holder. The SPID must be a valid SPID in the NPAC system. If your company does not have a SPID, please call the NPAC at 1-888-NPAC-HEL(P) for assistance.

<sup>2</sup> A Location Routing Number is a 10-digit number, in the format NPA-NXX-XXXX, that uniquely identifies a switch or point of interconnection (POI). The NPA-NXX portion of the LRN is used to route calls to numbers that have been ported.

<sup>3</sup> The Pooling Administrator will insert Block information. The Block will consist of NPA-NXX and the first digit of the 1K block.

<sup>4</sup> The Pooling Administrator will insert Block Effective Date. See section 9.2.4 of the Thousands-Block (NXX-X) Number Pooling Administration Guidelines for specifics on effective date. This is the earliest date that the NPAC will broadcast the Block information to all Local SMS's.

<sup>5</sup> If "YES" is marked the NPAC will activate the block range. If "NO" is marked it will be the responsibility of the SP to activate the block range.

<sup>6</sup> Customer Local Area Signaling Services Destination Point Code for 10-digit GTT for CLASS features for the 1K block. The CLASS DPC must be three sets of numbers where the value for each set ranges from 0 to 255

<sup>7</sup> Customer Local Area Signaling Services Subsystem Number for the 1K block. The CLASS SSN must be a number between 0 and 255.

<sup>8</sup> Line Information Database Destination Point Code for 10-digit GTT for LIDB features for the 1K block. The LIDB DPC must be three sets of numbers where the value for each set ranges from 0 through 255.

<sup>9</sup> Line information Database Subsystem Number for the 1K block. The LIDB DPC must be three sets of numbers where the value for each set ranges from 0 through 255.

<sup>10</sup> Calling Name Delivery Destination Point Code for 10-digit GTT for CNAM features for the 1K block. The CNAM DPC must be three sets of numbers where the value for each set ranges from 0 through 255.

<sup>11</sup> Calling Name Delivery Subsystem Number for the 1K block. The CNAM SSN must be a number between 0 and 255.

<sup>12</sup> Inter-Switch Voice Mail Destination Point Code for 10-digit GTT for ISVM features for the 1K Block. The ISVM DPC must be three sets of numbers where the value for each set ranges from 0 through 255.

<sup>13</sup> Inter-Switch Voice Mail Services Subsystem Number for the 1K block. The ISVM SSN must be a number between 0 and 255.

<sup>14</sup> Wireless Short Message Service Center Destination Point Code for 10-digit GTT for WSMSC features. This field is only required if the service provider supports WSMSC data. The WSMSC must be three sets of numbers where the value for each set ranges from 0 through 255.

<sup>15</sup> Wireless Short Message Service Center Subsystem Number for the 1K block. This field is only required if the service provider supports WSMSC data. The WSMSC must be a number between 0 and 255.



**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level<sup>1</sup>**  
**(Thousand-Block Number Pooling Growth Block Request)**

Date: 08/16/2004 OCN: 0328 Company Name: VERIZON FLORIDA INC.

Rate Center: TAMPA CENTRAL

List all codes NPA(s)-NXXs and Block NPA(s)-NXX-X(s): See attached list

Name of Block Applicant: Alice Jackson

Signature: Alice Jackson

Title: Specialist

Telephone No.: 972-318-5334

FAX No.: 972-317-2161

E-Mail: alice.jackson@verizon.com

A. Available Numbers: 329961

B. Assigned Numbers: \_\_\_\_\_

C. Total Numbering Resources: \_\_\_\_\_

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: \_\_\_\_\_

List excluded Code(s) or Block(s): \_\_\_\_\_

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	
E. Growth History - Previous 6 month <sup>2</sup>	<u>-1598</u>	<u>-2031</u>	<u>-1701</u>	<u>-1162</u>	<u>-1685</u>	<u>832</u>							
F. Forecast – Next 12 months <sup>3</sup>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	<u>2057</u>	
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>2057</u>												
H. Months to Exhaust <sup>4</sup>	<u>Number Available for Assignment to Customers (A)</u>						-						<u>160.4</u>
	<u>Average Monthly Forecast (G)</u>												
I. Utilization <sup>5</sup>	<u>Assigned Numbers (B) – Excluded Numbers (D)</u>						* 100 =						<u>        </u> %
	<u>Total Numbering Resources</u>												

Explanation: Total installed = 1658000, Total assigned = 1178092

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 audit 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) (iii)).  
 5 Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Appendix 3 – Modified August 6, 2001

NPA(s)-NXX-Xs included in growth calculation:

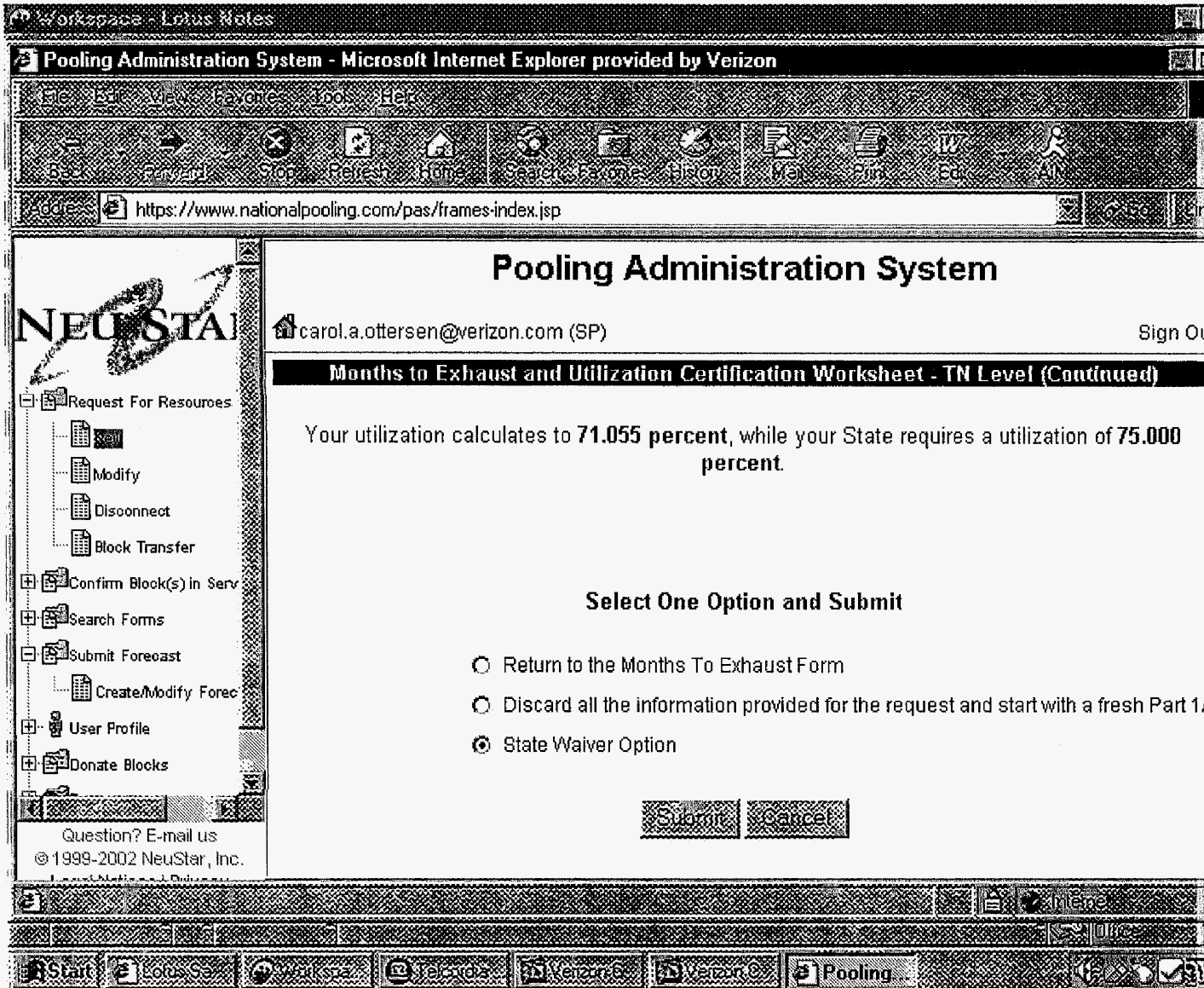
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Appendix 3 – Modified August 6, 2001

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Joan M. Gage  
08/23/2004 01:23 PM

To: Demetria C. Watts/EMPL/FL/Verizon@VZNotes  
cc: David M. Christian/EMPL/FL/Verizon@VZNotes  
Subject: 813 denial



Carol Ottersen  
Code Administrator  
Verizon Number Administration and  
Planning  
516-832-5773 Office  
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