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Nancy B. White  
General Counsel - Florida

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

COMMISSION  
CLERK

April 6, 2005

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: Petition for the Expedited Review of Growth Code Denials  
by the Number Pooling Administrator for the Orlando  
exchange (Azalea Park)**

Dear Ms. Bayó:

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

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 (R)*  
Nancy B. White

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

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*on*  
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Petition for the Expedited Review of Growth Code Denials**  
**by the Number Pooling Administrator for the Orlando**  
**exchange (Azalea Park)**

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

First Class U.S. Mail this 6th day of April, 2005 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  
Tel. No.: (407) 389-8929  
Fax. No.: (407) 682-1108  
[thomas.foley@neustar.com](mailto:thomas.foley@neustar.com)

  
\_\_\_\_\_  
Nancy B. White

**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 Orlando exchange (Azalea Park) )      Filed: April 6, 2005

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**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 Orlando 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 75 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. 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 which have been denied, including Cocoa Beach, Daytona Beach, DeLand, Ft. Lauderdale, Gainesville, Hollywood, Jacksonville, Keys, Miami, North Dade, Orlando, Palm Coast, Port St. Lucie, Sebastian, St. Johns, Weekiwachee Springs, 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 Orlando exchange consists of six (6) central offices and six (6) switching entities that utilize numbering resources: Azalea Park (ORLDFLAPDS0), Colonial (ORLDFLCLDS0), Magnolia (ORLDFLMADS1), Pinecastle (ORLDFLPCDS0), Pinehills (ORLDFLPHDS0), and Sandlake (ORLDFLSADS0).

13. On March 30, 2005, BellSouth requested additional numbering resources from NeuStar for the Azalea Park (ORLDFLAPDS0). **See** Attachment 1. Specifically, BellSouth requested one (1) 1,000 consecutive number block to meet a customer's request for 100 TNs in the format of (407) NXX-6XXX.

14. At the time of the code request, the Orlando exchange had a MTE of 21.04 and a utilization of 78.19%, while the MTE for the Azalea Park (ORLDFLAPDS0) switch was - 7.84.

15. On March 30, 2005, NeuStar's automated number request system 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 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Orlando exchange and the customer contact information for the customer. See Attachment 2.

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 Orlando exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Orlando exchange as discussed above.



Respectfully submitted this 6th day of April, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White RN

Nancy B. White  
c/o Nancy H. Sims  
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R. Douglas Lackey RN

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(404) 335-0747

580144

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### Pooling Administration System

bridge.bellsouth.com (SP) Sign Out

Part A

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 BELL SOUTH SO BELL  
 Headquarters Address [REDACTED]  
 City [REDACTED]  
 State AL  
 Zip: 35243

Contact Name [REDACTED]  
 Contact Address [REDACTED]  
 City [REDACTED] State AL  
 Zip 35243

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### Pooling Administration System

Contact Name Mr Gary Zahn  
 Contact Address 1800 Senter St. Ste. 700  
 City Concord State CA  
 Zip 94520  
 Telephone (925) 363-8753 Fax (925) 363-7688  
 E-mail gary.zahn@neustar.biz

1.2 General Information

LRN Needed No  
 NPA 407 LATA \* 458  
 OCN 9417-BELL SOUTH SO BELL  
 Parent Company OCN \* 9417  
 Number of Thousands-Blocks Requested 1  
 Switch Identification (Switching Identity PO) ORLDFLAPDSQ City or Wire Center Name  
 Rate Center ORLANDO Rate Center Sub Zone

REDACTED



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Choose a category for your search:

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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 NDOC-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 (NDOC-X) Pooling Administration Guidelines INC 98-0127-023

Continue Cancel

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Name of Block Applicant [REDACTED]  
Title [REDACTED]  
Telephone Number [REDACTED]  
Fax Number [REDACTED]  
E-Mail [REDACTED]@bellsouth.com

A. Available Numbers [REDACTED]  
B. Assigned Numbers [REDACTED]  
C. Total Numbering Resources [REDACTED]  
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<sup>2</sup> \***

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

**F. Forecast - Next 12 months<sup>3</sup> \***

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]
Month 7	[REDACTED]	Month 8	[REDACTED]
Month 9	[REDACTED]	Month 10	[REDACTED]
Month 11	[REDACTED]	Month 12	[REDACTED]

**G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)**

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

**Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))**

Month Requested	A Available Numbers	# Months to Exhaust
1	[REDACTED]	21.037

**Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded numbers (D)) \* 100** 78.188

Transition

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when request additional numbering resources in a rate center. For auditing purposes, the applicant must retain this document.

2. Net change in TNs no longer available for assignment in each previous month, starting with the month as Month #1, and Month #6 as the current month.

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NEUSTAR

Request For Removal

- Modify
- Disconnect
- Block Transfer

Confirm Block(s) in Served

- Search Form
- Submit Forecast
- User Profile
- Delete Block
- Reports

Question? E-mail us  
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### Pooling Administration System

Sign Out

You have requested more blocks than you will exhaust in six 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

Submit Cancel

Orlando  
Utilization Summary  
Report

Attachment 2

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Orlando	Azalea Park	ORLDFLAPDS0	210				
Orlando	Colonial	ORLDFLCLDS0	73				
Orlando	Magnolia	ORLDFLMADS1	369				
Orlando	Pinecastle	ORLDFLPCDS0	200				
Orlando	Pinehills	ORLDFLPHDS0	182				
Orlando	Sandlake	ORLDFLSADS0	185				

Customer Contact Information



**REDACTED**