REDACTED BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Time Warner Telecom of Florida, L.P. for Expedited Review of Pooling Administrator's Denial of Request for Additional Numbering Resources for Sanford Exchange

Docket No.: 050467-TP

PETITION FOR ADDITIONAL NUMBERING RESOURCES

COMES NOW the Petitioner, Time Warner Telecom of Florida, L.P., by and through its undersigned attorneys and requests the Florida Public Service Commission approve its application to the Pooling Administrator for additional numbers in the Sanford Rate center and would show the Commission the following:

1. Time Warner Telecom of Florida, L.P., is a telecommunications provider in the Sanford Rate Center area. On or about, June 29, 2005, Time Warner Telecom submitted an application via the internet to NeuStar for a block of **Second Materia** numbers in the Sanford Rate center **Second Materia**, for additional numbers. On or about, June 29, 2005, NeuStar denied the request for additional numbering resources because the company had not met the rate center needs of less than six (6) months to exhaust numbers or other criteria currently required to obtain additional numbers.

2. Specifically, Time Warner was currently issued block numbers

for current and additional numbers to be added for growth in customer facilities.

06422 JUL-7 B FPSC-COMMISSION CLERK 3. To date, the total utilization is 49.3% in this number range, while NeuStar requires that utilization be at least 75% in order to apply for additional numbering blocks. A copy of the utilization report is attached.

4. Time Warner Telecom has demonstrated it has a customer in need of immediate numbering resources which are not available to Time Warner Telecom.

5. Time Warner Telecom has shown that it is unable to provide additional services to the existing customer because of NeuStar denial of the numbering resources. It will be unable to provide services to the customer from a switch in a non-pooling rate center where the supply of numbers in sequence is not available. The customer has need of these numbers and wishes to change these numbers to the new block no later than November 1, 2005.

6. The request for the bank of telephone numbers is necessary for an upgrade from current call processing which would require Time Warner to utilize capacity in its existing blocks but which are not sequential. Numbering which is not sequential will cause disruption and processing problems and require extensive maintenance of the telephone system for the client. As such, the client will not be able to fully and effectively utilize the features of its telephone system and the expansion and Time Warner will be hindered in its client relations.

7. If Staff has additional questions or would like to verify the information represented in this Petition, the Time Warner Telecom contact is Ms. Carolyn Marek, Vice President for Regulatory Affairs. She may be reached at 615-376-6404.

8. Petitioner requests this Petition be reviewed on an expedited basis to meet competitive demands and the customer's request for service.

WHEREFORE, Time Warner Telecom requests:

a. that the Public Service Commission enter its order directing that NeuStar provide Time Warner with **Service Commission enter** in the Sanford Rate center as soon as possible;

b. granting such other and further relief as it shall deem just and proper.

RESPECTFULLY REQUESTED this <u>day of July</u>, 2005.

I.

PETER M. DUNBAR Florida Bar Number: 0146594 HOWARD E. ADAMS Florida Bar Number: 0322210 Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. Post Office Box 10095 Tallahassee, Florida 32302-2095 Telephone: (850) 222-3533 Facsimile: (850) 222-2126 ATTORNEYS FOR TIME WARNER TELECOM OF FLORIDA, L.P.