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BellSouth Telecommunications, Inc.
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November 15, 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

050870-TL

**Re: Petition for the Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the Miami
exchange (Palmetto)**

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,


Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
R. Douglas Lackey
Nancy B. White

DOCUMENT NUMBER DATE

10983 NOV 15 05

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the Miami
exchange (Palmetto)

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

First Class U.S. Mail this 15th day of November, 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


Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the Miami exchange (Palmetto))
_____)

Docket No. *050870-TL*
Filed: November 15, 2005

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 Miami 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. 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 Cocoa Beach, Daytona Beach, DeLand, Ft. Lauderdale, Gainesville, Hollywood, Jacksonville, Jensen Beach, Keys, Miami, North Dade, Orlando, Palm Coast, Port St. Lucie, Sanford, 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 Miami exchange consists of twenty four (24) central offices and twenty eight (28) switching entities that utilize numbering resources: Airport (MIAMFLAPDS0), Alhambra (MIAMFLAEDS0 and MIAMFLAERS0), Allapattah (MIAMFLALDS0), Bayshore (MIAMFLBA85E), Beach (MIAMFLBRDS0), Biscayne (MIAMFLBCDS0), Canal (MIAMFLCADS0), Dadeland (MIAMFLDBRS1), Flagler (MIAMFLFLDS0), Grande (MIAMFLGRDS0 and MIAMFLGRDS1), Hialeah (MIAMFLHLDS0), Indian Creek (MIAMFLICDS0), Key Biscayne (MIAMFLKEDS0), Metro (MIAMFLME32E and MIAMFLMERS0), Shores (MIAMFLSHDS0), North Miami (MIAMFLNMDS0), Northside (MIAMFLNSDS0), Opa Locka (MIAMIFLOLDS0), Palmetto (MIAMFLPLDS0 and MIAMFLPLRS0), Poinciana

(MIAMFLPBDS0), Red Road (MIAMFLRRDS0), Silver Oaks (MIAMFLSODS0), West Dade (MIAMFLWDDS0) and West Miami (MIAMFLWMDS0).

13. On November 7, 2005, BellSouth requested additional numbering resources from NeuStar for the Palmetto (MIAMFLPLDS0) switch. See Attachment 1. Specifically, BellSouth requested four NXX-Xs for a specific customer request. The format of the blocks the customer needs to meet its dialing patterns are 786-NX3-4, 5, 7 and 9XXX.¹

14. At the time of the code request, the Miami exchange had a MTE of 40.01 and a utilization of 75.361%, while the MTE for the Palmetto (MIAMFLPLDS0) switch was – 21.91.

15. On November 7, 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 Miami 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).

¹ Since NeuStar's current inventory does not have any blocks to meet this request, BellSouth had to request a full NXX be assigned to NeuStar inventory.

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 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 CLECs, 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.

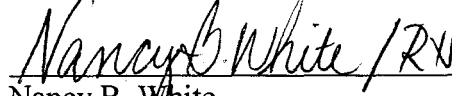
(c) As a result of NeuStar's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

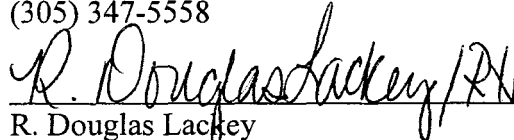
1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the Miami exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Miami exchange as discussed above.

Respectfully submitted this 15th day of November, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

/RN

Nancy B. White
Manuel A. Gurdian
c/o Nancy H. Sims
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(305) 347-5558

/RN

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

610045

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Attachment 1

Pooling Administration System

bellsouth.com (SP) Sign Out

State: FLORIDA
NPA: 785
Rate Center: MIAMI
OCN: 3417-BELLSOUTH SO BELL
Type of Application: Application for a full NOC on Behalf of a PA

Continue Cancel

NOTE:
If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing data occurs.

Question? E-mail us
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Local Migrations | Behavioral Management

Pooling Administration System

bellsouth.com (SP) Sign Out

Do you already have a blockcode in this rate center? Yes No

Which block(s) will be retained?
0 1 2 3 4 5 6 7 8 9
[] [] [] [] [] [] [] [] [] []

Will all blocks be activated on the same switch? Yes No

Will there be multiple block effective dates requested? Yes No

Back Continue Cancel

Question? E-mail us
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Local Migrations | Behavioral Management

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NEUSTAR

Request For Resources
Block
Disconnect
Block Transfer
Custom Block(s) in Service (Full)
Search Forms
Submit Forecast
Creatively Forecast
User Profile
Create Blocks
Reports

QUESTION? E-mail us
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Local Network | Behavioral Administration

Pooling Administration System

bellsouth.com (P)

Sign Out

Date Monday, November 7, 2005
OCN 9417
Company Name BELLSOUTH 50 BELL
Rate Center MIAMI

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-K
(1)

Name of Block Applicant Ms Debraannee Bowman

NEUSTAR

Request For Resources
Block
Disconnect
Block Transfer
Custom Block(s) in Service (Full)
Search Forms
Submit Forecast
Creatively Forecast
User Profile
Create Blocks
Reports

QUESTION? E-mail us
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Pooling Administration System

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]

List included Code(s) or Block(s)

REDACTED

NEUSTAR

Request For Resources

Request For Resources

Monthly

Discontinued

Block Transfer

Coexist (No-ops) in Service (Part of)

Search Frame

Search Forecast

Crash/No-daily Forecast

User Profile

Search Mode

Reports

Question? E-mail us
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Growth History - Previous 6 months²

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

Forecast - Next 12 months³

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]

NEUSTAR

Request For Resources

Request For Resources

Monthly

Discontinued

Block Transfer

Coexist (No-ops) in Service (Part of)

Search Frame

Search Forecast

Crash/No-daily Forecast

User Profile

Search Mode

Reports

Question? E-mail us
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Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)

Months in Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (C))

1	[REDACTED]	39,744
2	[REDACTED]	39,632
3	[REDACTED]	39,520
4	[REDACTED]	38,998

Utilization⁵ (Assigned Numbers (B) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100)

75.361

Explanation

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. Not shown in this table are resources available for assignment in each resource month - start with the most distant month as

REDACTED

Pooling Administration System

Based on the information provided, you will not exhaust all the blocks you wish to retain from the full NDC 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

Submit Cancel

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Equal Housing Opportunity

4

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Central Office Code (NXX) Assignment Request – Part 1
Revised September 24, 2001

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant: [REDACTED]
 Company/Entity Name: BellSouth
 Headquarters Address: [REDACTED]
 City, State, Zip: Atlanta, Georgia 30375
 Contact Name: [REDACTED]
 Contact Address: 675 W Peachtree Street NE 22P69
 City, State, Zip: Atlanta, GA 30375
 Phone: [REDACTED] FAX: [REDACTED] E-Mail: [REDACTED]@bellsouth.com
 Code Administrator:²
 Name: Milton Cruz
 Address: 46000 Center Oak Plaza
 City, State, Zip: Sterling, VA 20166
 Phone: 571 434-5348 FAX: 571 434-5502

1.2 NPA: 786 NXX:³ _____ LATA: 46017 OCN:⁴ 9417 Parent Company's OCN 9400
 Switching Identification (Switching Entity/POI):⁵ MIAMFLPLDS0
 Locality/City/Wire Center: MIAMI Rate Center:⁶ MIAMI
 Homing Tandem Operating Co.:⁷ BST Tandem Homing CLLI™:⁸ NDADFLGG01T

1.3 Dates: Date of Application: 11/8/05 Requested Effective Date:^{9,10} ASAP

- 1.4 Type of company/entity requesting the code:
- a). WIRELINE (LEC, IC, CMRS, Other)
 - b). b) Type of service DID (e.g., Cellular - Type 2)
 - c). Code Assignment Preference (Optional) CUSTOMER REQUEST [REDACTED]
 - d). Codes that are undesirable, if any 666, 800, 900
 - e). Type of change: _____

1.5 Type of Request (Initial, growth, etc.): GROWTH..REQUEST FOR DEDICATED CUSTOMER REQUEST CODE SHOULD NOT BE POOLED

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pool Indicator N (YES)¹¹

1.6 NPA Jeopardy Criteria Apply: Yes _____ No _____

1.7 Code request for new service (Explain): 1.8 Part 2 is attached _____ Part 2 is not attached _____ for BIRDS^{12,13}

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application¹⁴:

[REDACTED] CODE ADMINISTRATOR 11/08/05
 Signature of Code Applicant¹⁵ Title Date

5

REDACTED

**Central Office Code (NXX) Assignment Request – Part 1
Footnotes**

1. Identify type and reason for change(s) in Section 1.4(e).
2. A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
3. The NXX field is required for any code request in which there is a change or the NXX is being returned.
4. 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 may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.
5. This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE® CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
6. Rate Center name must be a tariffed Rate Center associated with toll billing.
7. Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
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 switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
9. Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
10. Requests for code assignment should not be made more than six months prior to the requested effective date.
11. The Pool Administrator will indicate if the NXX being requested will be used for thousandsblock number pooling.
12. Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.
13. **WARNING!** It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.
14. An incomplete form may result in delays in processing this request.
15. To establish a signature on file see Section 6.1.1.

Miami
Utilization Summary
Report

Attachment 2

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Exchange	Central Office	Wire Center CLLI	Blocks	Available TNs	Average Growth	MTE	Util
Miami	Airport	MIAMFLAPDS0	79				
Miami	Alhambra	MIAMFLAEDS0	177				
Miami	Alhambra	MIAMFLAERS0	7				
Miami	Allapattah	MIAMFLALDS0	60				
Miami	Bayshore	MIAMFLBA85E	82				
Miami	Beach	MIAMFLBRDS0	117				
Miami	Biscayne	MIAMFLBCDS0	46				
Miami	Canal	MIAMFLCADS0	194				
Miami	Dadeland	MIAMFLDBRS1	18				
Miami	Flagler	MIAMFLFLDS0	74				
Miami	Grande	MIAMFLGRDS0	39				
Miami	Grande	MIAMFLGRDS1	272				
Miami	Hialeah	MIAMFLHLDS0	250				
Miami	Indian Creek	MIAMFLICDS0	70				
Miami	Key Biscayne	MIAMFLKEDS0	23				
Miami	Metro	MIAMFLME32E	91				
Miami	Metro	MIAMFLMERS0	10				
Miami	Shores	MIAMFLSHDS0	80				
Miami	North Miami	MIAMFLNMDS0	60				
Miami	Northside	MIAMFLNSDS0	67				
Miami	Opa Locka	MIAMFLOLDS0	64				
Miami	Palmetto	MIAMFLPLDS0	333				
Miami	Palmetto	MIAMFLPLRS0	15				
Miami	Poinciana	MIAMFLPBDS0	98				
Miami	Red Road	MIAMFLRRDS0	133				
Miami	Silver Oaks	MIAMFLSODS0	131				
Miami	West Dade	MIAMFLWDDS0	91				
Miami	West Miami	MIAMFLWMDS0	107				

REDACTED

Customer Information

