

ORIGINAL



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December 14, 2005

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

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05 DEC 14 PM 12:42
COMMISSION
CLERK

050917-7x

Re: Request for Waiver of Pooling Administrator's Denial of AT&T's Request to NeuStar for 1,000 Numbers to Meet a Specific Customer Need

Note: Attachments 1 and 2 to this letter contain Confidential Proprietary Business Information

Dear Ms. Bayo:

AT&T respectfully submits this request for Application of the "safety valve" for NXX-X Acquisition in the state of Florida. By this letter, AT&T requests that the Florida Public Service Commission ("Commission") overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of AT&T's application for two blocks of telephone numbers and that the Commission authorize the PA to release the requested blocks of telephone numbers so that AT&T may serve its customer.

This request is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").¹ A Florida customer of AT&T has requested that AT&T provide a block of 1,000 consecutive numbers for its place of business in the Orlando rate center.² AT&T has developed a communications plan that the customer will implement, and consequently, the customer will assign the 1,000 numbers within 180 days of the numbers being made available by AT&T to the customer's enterprise. The customer would like to begin using the new numbers as soon as they are available.

- CMP 1
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH 1

¹ These guidelines may be found on the INC web site: <http://www.atis.org/inc/docs.asp>
² AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions. See Attachment 1, Company-Proprietary customer letter.

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DOCUMENT NUMBER-DATE

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FPSC-BUREAU OF RECORDS

FPSC-COMMISSION

1 conf records

The customer's request is for 1,000 consecutive numbers in the 3000 range. The customer's dial plan is not compatible with a 0, 8 or 9 block. There are currently 92 blocks in the number pool for this rate center, and 3 blocks match the customer's need.³

The Orlando rate center of the 407 Area Code began Number Pooling on May 9, 2002. Consequently, normal numbering resource acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA⁴.

On December 7, 2005, AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA⁵ using the Pooling Administration System ("PAS"). One thousand-blocks in the Orlando rate center was requested.

At the completion of this session on PAS, AT&T received, via PAS, an error message indicating the request would not process through the system without a state waiver.⁶ The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources within the rate center will both exhaust within 6.0 months, and meet the 75% utilization level. The error message indicated that the utilization level was not met.

Although AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, AT&T's existing telephone resources cannot satisfy its customer's specific need.

AT&T acknowledges the Commission's cooperation with similar "safety valve" requests in the past and appreciates its consideration herein. AT&T respectfully requests that the Commission overturn the PA's decision in the interest of our customer.

Attachments 1 and 2 to this request contain confidential proprietary business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, AT&T requests that the highlighted information contained in Attachments 1 and 2 be treated by the Commission as confidential and withheld from public inspection. In accordance with Rule 25-22.006, please find enclosed one copy of Attachments 1 and 2 with the confidential information highlighted and two redacted copies.

³ See Florida 727 NPA STPETERSBG Rate Center: <http://nationalpooling.org/reports/index.htm>

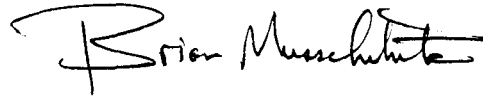
⁴ The federal rules in 47 C.F.R. 52.15 generalize responsibilities of NANPA and the PA under the heading "Central office code administration".

⁵ A copy of the Part 1A and MTE worksheet are appended. AT&T asks the Commission to treat the information contained therein as confidential. See Attachment 2.

⁶ A copy of the error message is appended to the Part 1A and MTE forms. AT&T asks the Commission to treat the information contained therein as confidential. See Attachment 2.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Brian Musselwhite". The signature is written in a cursive style with a large, looping initial "B".

Brian Musselwhite