Manuel A. Gurdian Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

April 5, 2006

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

060322-TL

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Coral Springs exchange (PMBH Coral Springs)

Dear Ms. Bayó:

Enclosed is an original and 15 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 E. Earl Edenfield, Jr. James Meza III

> DOCUMENT NUMPER-DATE 03088 APR-58 FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Coral Springs exchange (PMBH Coral Springs)

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

First Class U.S. Mail this 5th day of April, 2006 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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the Number Pooling Administrator) for the Coral Springs exchange (PMBH Coral Springs)

Docket No.

Filed: April 5, 2006

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 requests for additional numbering resources in the Coral Springs 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

> DOCUMENT NUMBER-DATE 03088 APR-58 **FPSC-COMMISSION CLERK**

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 \P 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 \P 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, including Cocoa Beach, Coral Springs, 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.

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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 Coral Springs exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: PMBH Coral Springs (PMBHFLCSDS0).

On March 27, 2006, BellSouth requested additional numbering resources
from NeuStar for the PMBH Coral Springs (PMBHFLCSDS0) switch. See Attachment
BellSouth requested a single block to meet a specific customer's request for 500
consecutive telephone numbers in the format of NX8.

14. At the time of the code request, the Coral Springs exchange had a MTE of21.69 and a utilization of 72.86%.

15. On March 27, 2006, NeuStar's automated number request system denied BellSouth's request for additional numbering resources because BellSouth had not met

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the utilization based months-to-exhaust criteria, notwithstanding the fact that BellSouth is unable to provide the numbering resources requested by the specific customer. <u>See</u> Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the customer contact information. <u>See</u> 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. <u>See</u> 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) 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.

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WHEREFORE, BellSouth requests:

1. The Commission review the decision of NeuStar to deny BellSouth's

request for additional numbering resources for the Coral Springs exchange; and

2. The Commission direct NeuStar to provide the requested numbering resources for the Coral Springs exchange as discussed above.

Respectfully submitted this 5th day of April, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC. James Meza III

Manuel A. Gurdian 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5558

RYU der E. Earl Edenfield, Jr.

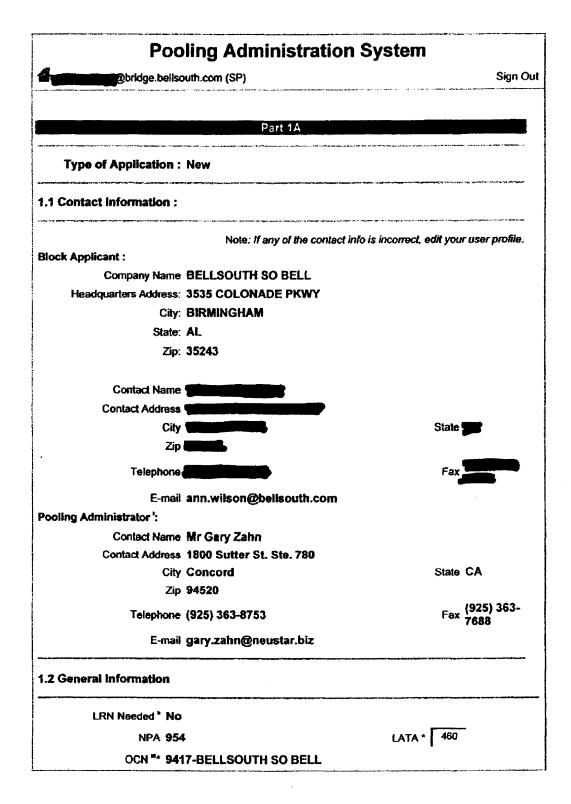
675 West Peachtree Street, Suite 4300 Atlanta, Georgia (404) 335-0763

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ATTachmentl

REDACTED



Parent Company OCN *	417			
Number of Thousands- Blocks Requested				
Switch Identification (Switching Identity/POI)	MBHFLCSDS0		City or Wire Center Name	COLAR SPRINGS
Rate Center * C	ORAL SPRI	NGS	Rate Center Sub Zone	
1.3 Dates		*,)		
Date of Application " M	onday, Mar	ch 27, 2006		
Requested Block	7 • A	pr 👻 2006	×	
Request Expedited r Treatment	Yes Nk	5		
1.4 Type of Service Provid	ler Request	ting the Thousan	nd s-Block	
a) Type of Service Provider *	icumbent Local	Ecchange Carrier (I	LEC)	
b) Primary type of service V Blocks to be used for *	Vreine			
c) Thousands-Block(s) (N assignment Click here to see the availab	preference		-	
NOTE: The blocks available shows blocks that are avail time a request is submitted, same blocks may not be av the time the request is proc Therefore, it is recommende you provide additional block preferences in the event the are not available.	able at the These ailable at essed. ed that			
d) Thousands-Block(s) (NPA-H are undesirable for this as:				
e) If requesting a code for LRN keeping (the remainder of the I	purposes, in	dicate which block given to the pool)	(s) you will be N/A]

.

1.5 Type of Request	
Initial block for rate center C Yes	
Growth block for rate center FYes	
Change block N/A	
Disconnect block N/A	
I hereby certify that the above information requesting an NXX-X block is true and accurate to the best my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines (ATIS-0300066)	st of
Continue	
Instructions for filling out each Section of the Part 1A form:	
Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Poolin Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail. Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing N (LRN)are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be	ng iumbei ce
submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia [™] LE Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OC parent company. An OCN is a four-character alphanumeric assigned by Telcordia [™] Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homin tandem and CLLI [™] tandem of the facilities based provider ^{vii} . Explanations of these terms may be for the footnotes.	ERG ¹¹ CNits 169 103
Section 1.3 The date the Service Provider completes the application should be entered in this sectio well as the Effective Date of the requested thousands-block.	n, as
Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive loc exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in wh the numbering resource is to be used. Service Providers also may indicate their preference for a par thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 32 6XXX.	hich Iticular
Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications fo thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which th applicant already has numbering resources, and provide the required evidence as ordered by the FC	1e
The thousands-block applicant certifies veracity of this form by signing their name, and providing the and date.	ir title
Foot Notes:	
' The Pool Administrator is available to assist in completing these forms. A CO Code application will also need to be submitted to the PA Comparing Company Number (CCN) assignment or the part of the section of the	~~
[#] Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to (<u></u>

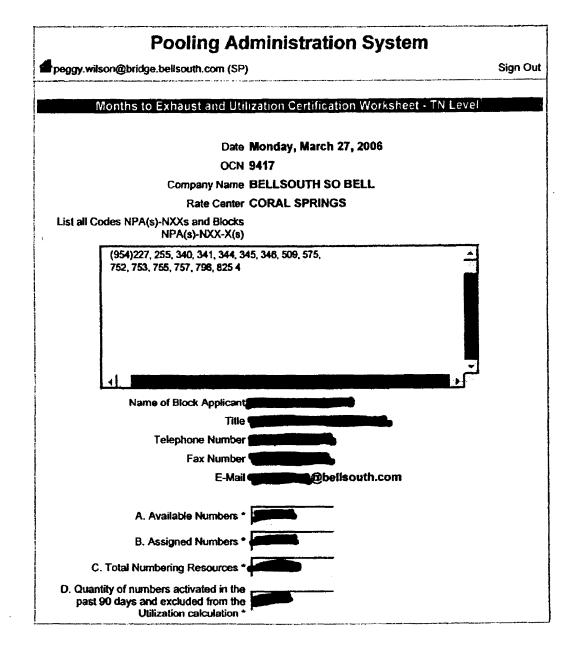
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Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700). [™] This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI[™] code of the switch /POI.

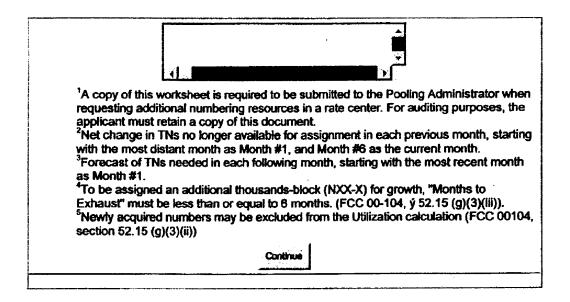
^Y Rate Center name must be a tariffed Rate Center.

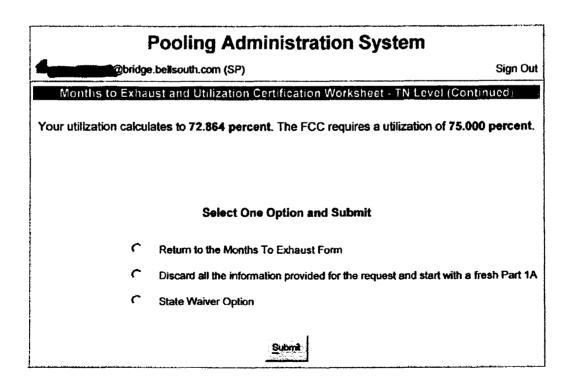
"Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request. ¹⁴ Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.



List excluded Co	de(s) or Block(s)		1997) - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997
Growth History - Previou	s 6 months ² *		
Month 1		Month 2	
Month 3		Month 4	
Month 5		Month 6	
Forecast - Next 12 mont	hs ³ *		· · · · · · · · · · · · · · · · · · ·
Month 1		Month 2	
Month 3		Month 4	9
Month 5		Month 6	
Month 7		Month 8	
Month 9		Month 10	
Month 11		Month 12	
))	mbers Available for Ass		A) / Average Monthly Forecas H. Months to Exhaus
	1		21.689
Utilization ⁵ (Assigned Nun cluded Numbers (D)) * 1	nbers (8)) / (Total Numb 00	ering Resources (C) -	72.864
planation			

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Coral Springs

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Attachment 2

Customer Contact Information