

Manuel A. Gurdian
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Room 400
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(305) 347-5561

June 26, 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

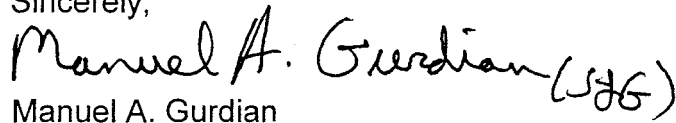
Re: Docket No.: 060477-TL
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the Orlando
exchange (Magnolia)

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
E. Earl Edenfield, Jr.
James Meza III

DOCUMENT NUMBER-DATE

05661 JUN 26 06

FPSC-COMMISSION CLERK

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

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

First Class U.S. Mail this 26th day of June, 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


Manuel A. Gurdian

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 (Magnolia)) Filed: June 26, 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 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. 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).

5. On June 15, 2006, BellSouth requested additional numbering resources from NeuStar for the Magnolia (ORLDFLMADS1) switch. See Attachment 1. Specifically, BellSouth requested four (4) blocks to meet the request of a specific customer for consecutive numbers.

6. At the time of the code request, the Orlando exchange had a MTE of 46.38 and a utilization of 74.35%, while the Magnolia (ORLDFLMADS1) switch had a MTE of 555.

7. On June 15, 2006, NeuStar's automated number request system denied BellSouth's request for additional numbering resources because BellSouth had not met the utilization based 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 customers' contact information. See Attachment 2.

8. 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).

9. 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.

10. 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.

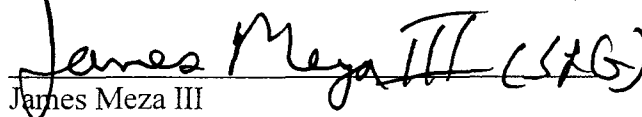
(c) As a result of NeuStar's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

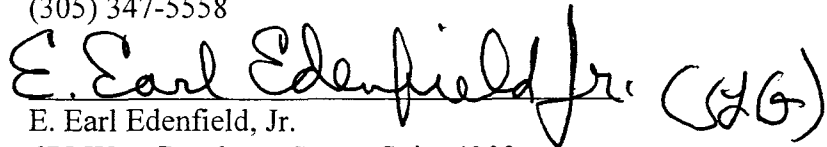
1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the Orlando exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Orlando exchange as discussed above.

Respectfully submitted this 26th day of June, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (SG)

James Meza III
Manuel A. Gurdian
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

 (SG)

E. Earl Edenfield, Jr.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763

REDACTED

Attachment 1

Pooling Administration System

NEUSTAR

Request For Resources

State: FLORIDA
NPA: 407
Rate Center: ORLANDO
OCN: 9417-BELLSOUTH SO BELL
Type of Application: Application for Individual Blocks
Quantity of Blocks Requested: 4

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 date occurs.

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Pooling Administration System

NEUSTAR

Part 1A

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: BELLSOUTH SO BELL
Headquarters Address: [REDACTED]
City: [REDACTED]
State: [REDACTED]
Zip: [REDACTED]

Contact Name: [REDACTED]
Contact Address: [REDACTED]
City: [REDACTED] State: [REDACTED]
Zip: [REDACTED]

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Address: https://www.nationalpooling.com/pas/frames-index.jsp

Google

E-mail gary.zahn@newstar.biz

NEUSTAR

- Request For Resources
 - Request For Resources
 - Modify
 - Discontinued
 - Block Transfer
- Custom Blocks in Service
- Search Forms
- Submit Forecast
 - Create/Modify Forecast
- User Profile
- Disable Blocks
- Reports

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1.2 General Information

LRN Needed? No

NPA 407 LATA 458

OCN No. 9417-BELLSOUTH 50
BELL

Parent Company OCN 9417

Number of Thousands-Blocks Requested 4

Switch Identification (Switching Identity/PO) ORLDFLMADSI City or Wire Center Name

Rate Center ORLANDO Rate Center Sub Zone

1.3 Dates

Date of Application Thursday, June 15, 2006

Requested Block Effective Date 15 JUN 2006

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Request Expedited Treatment Yes No

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 - Request For Resources
 - Modify
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 - Block Transfer
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- Search Forms
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 - Create/Modify Forecast
- User Profile
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1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider Incumbent Local Exchange Center (ILEC)

b) Primary type of service Blocks to be used for Wireline


c) Thousands-Block(s) (NPA-NOC-X) assignment preference
Click here to see the available blocks in the pool.

NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.

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Request For Resources
 Modify
 Disconnect
 Block Transfer
 Confirm Block(s) in Service
 Search Forms
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a) 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 NXX-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 (NXX-X) Pooling Administration Guidelines (ATIS-0300068)

Continue Cancel

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Pooling Administration System

bridge.bellsouth.com (BP)

Date Thursday, June 15, 2006
 OCN 9417
 Company Name BELLSOUTH SO BELL
 Rate Center ORLANDO


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

Name of Block Applicant

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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]


List excluded Code(s) or Block(s):

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E. Growth History - Previous 6 months² *

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

F. 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]

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

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	Available Numbers	Months To Exhaust
1	[REDACTED]	46.380
2	[REDACTED]	46.619
3	[REDACTED]	46.858
4	[REDACTED]	47.097

I. Utilization⁴ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 = 74.350

Explanation


⁴A 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

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Pooling Administration System

[REDACTED]@bridge.bellsouth.com (BP) [Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet (K Level - Continued)

Your utilization calculates to 74.350 percent. The FCC requires a utilization of 75.000 percent.

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

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5

Orlando
Utilization Summary
Report

Attachment 2

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

Customer Contact Information

