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Legal Department

Manuel A. Gurdian
Attorney

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

COMMISSION
CLERK

December 4, 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

060776-TL
Re: **Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Port St. Lucie exchange (Main)**

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 /RN
Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

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FPSC-BUREAU OF RECORDS

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the
Port St. Lucie exchange (Main)

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

First Class U.S. Mail this 4th day of December, 2006 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
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NPA Relief Planner
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Longwood, Florida 32779-2327
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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 Port St. Lucie exchange (Main))	Docket No.
)	Filed: December 4, 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 Port St. Lucie 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

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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 Port St. Lucie exchange consists of three (3) central offices and three (3) switching entities that utilize numbering resources: Hutchinson Island (HTIDFLMADS0), Main (PTSLFLMADS0) and South (PTSLFLSOCG0).

5. On November 17, 2006, BellSouth requested additional numbering resources from NeuStar for the Main (PTSLFLMADS0) switch. See Attachment 1. Specifically, BellSouth requested three blocks for growth since the switch was less than six months to exhaust.¹

6. At the time of the code request, the Port St. Lucie exchange had a MTE of 10.80 and a utilization of 85.65%, while the Main (PTSLFLMADS0) switch had a MTE of 3.76.

7. On November 17, 2006, NeuStar's automated number request system denied BellSouth's request for additional numbering resources because BellSouth had not met the rate center based months-to-exhaust criteria. 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 Port St. Lucie exchange. 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

¹ Due to the limited number of blocks in the pool and the projected forecast for blocks in the future, NeuStar asked BellSouth to request a full NXX and donate the additional blocks back to the pool.

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'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) 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 Port St. Lucie exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Port St. Lucie exchange as discussed above.

Respectfully submitted this 4th day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



James Meza III

Manuel A. Gurdian

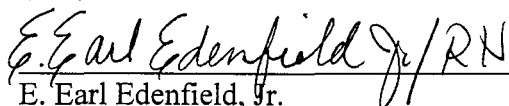
c/o Nancy H. Sims

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

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E. Earl Edenfield, Jr.

675 West Peachtree Street, Suite 4300

Atlanta, Georgia


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660000

REDACTED

Attachment 1

Pooling Administration System

@bridge.bellsouth.com (SP) Sign Out

Request Resources

State

NPA

Rate Center

OCN

Type of Application

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.

Pooling Administration System

REDACTED

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Friday, November 17, 2006

OCN 9417

Company Name BELLSOUTH SO BELL

Rate Center PORT ST LUCIE

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

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)

E. Growth History - Previous 6 months² *

Month 1	[Redacted]	Month 2	[Redacted]
---------	------------	---------	------------

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]

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	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	10.795
2	[REDACTED]	11.915
3	[REDACTED]	13.035

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **85.647**

Explanation

Code request on behalf of PA keeping 3 blocks

¹A 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.

²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104,

REDACTED

Pooling Administration System

@bridge.bellsouth.com (SP)

[Sign Out](#)

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

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

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Port St. Lucie
Utilization Summary
Report

Attachment 2

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Avg Growth Per Month	Available TNs	MTE	Utilization
Port St. Lucie	Hutchinson Island	HTISFLMADS0	10				
Port St. Lucie	Main	PTSLFLMADS0	100				
Port St. Lucie	South	PTSLFLSOCG0	34				