

ORIGINAL

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Legal Department

Manuel A. Gurdian
Attorney

07 FEB 15 PM 3:32

AT&T Florida
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

COMMISSION
CLERK

February 15, 2007

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: ^{070116-TL} **Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
West Palm Beach exchange (Greenacres)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida'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

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01546 FEB 15 07

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the
West Palm Beach exchange (Greenacres)

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

First Class U.S. Mail this 15th day of February, 2007 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

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the West Palm Beach exchange (Greenacres))
_____)

Docket No. 070116-TL

Filed: February 15, 2007

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”), 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 AT&T Florida’s request for additional numbering resources in the West Palm Beach exchange. In support of this petition, AT&T Florida states:

PARTIES

1. AT&T Florida 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

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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. The West Palm Beach exchange consists of seven (7) central offices and eight (8) switching entities that utilize numbering resources: Gardens (WPBHFLGRDS0), Greenacres (WPBHFLGADS0), Haverhill (WPBHFLHHDS0 and WPBHFLHHRS0), Lake Worth (WPBHFLLEDS0), Main Annex (WPBHFLANDS0), Riviera Beach (WPBHFLRB84E), and Royal Palm Beach (WPBHFLRPDS0).

5. On February 12, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Greenacres (WPBHFLGADS0) switch. See Attachments 1. Specifically, AT&T Florida requested one (1) block to meet the request of a specific customer for 200 consecutive numbers in the format of NPA NXX-1XXX.

6. At the time of the code request, the West Palm Beach exchange had a MTE of 21.75 and a utilization of 66.86%, while the Greenacres (WPBHFLGADS0) switch had a MTE of 14.18.

7. On February 12, 2007, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida 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 West Palm Beach exchange and the customer's 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. AT&T Florida requests that the Commission's reverse NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NeuStar's denial of numbering resources to AT&T Florida interferes with AT&T Florida'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. AT&T Florida 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

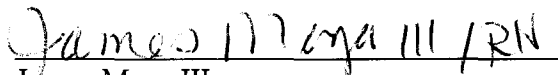
CLECs, which have recently entered the local service market, have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

(c) As a result of NeuStar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, AT&T Florida requests:

1. The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the West Palm Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the West Palm Beach exchange as discussed above.

Respectfully submitted this 15th day of February, 2007.



James Meza III

AUTHORIZED HOUSE COUNSEL NO. 426260¹

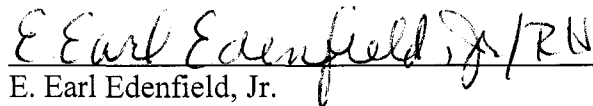
Manuel A. Gurdian

c/o Nancy H. Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



E. Earl Edenfield, Jr.

675 West Peachtree Street, Suite 4300

Atlanta, Georgia

(404) 335-0763


667921

¹ The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, has been granted qualified representative status by the Commission for 2006 in Order No. PSC-06-0165A-FOF-OT, and has filed an Application for Qualified Representative Status for 2007 in Docket No. 070008-OT per Commission Order No. 07-0008-PCO-OT.

REDACTED

Attachment 1

Pooling Administration System

@bridge.bellsouth.com (SP) Sign Out

Request Resources

State

NPA

Rate Center

OCN

Type of Application

Quantity of Blocks Requested

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.

REDACTED

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 BILLSOUTH SO BELL

Headquarters Address: [REDACTED]

City: [REDACTED]

State: [REDACTED]

Zip: [REDACTED]

Contact Name [REDACTED]

Contact Address [REDACTED]

City [REDACTED]

Zip [REDACTED]

State [REDACTED]

Telephone [REDACTED]

Fax [REDACTED]

E-mail [REDACTED]@bellsouth.com

Pooling Administrator :

Contact Name Ms Dara Sodano

Contact Address 1800 Sutter St. Ste. 780

City Concord

Zip 94520

State CA

Telephone (925) 363-8730

Fax (925) 363-7697

E-mail dara.sodano@neustar.biz

1.2 General Information

LRN Needed ⁱⁱ No

NPA 561

LATA • 460

OCN ⁱⁱⁱ 9417-BILLSOUTH SO BELL

Parent Company OCN • 9417

Number of Thousands-
Blocks Requested 1

Switch Identification
(Switching Identity/POI) ^{iv} wpbhfgads0

City or Wire
Center Name w palmbeach

Rate Center ^v WEST PALM BEACH

Rate Center
Sub Zone

1.3 Dates

Date of Application ^{vi} Monday, February 12, 2007

REDACTED

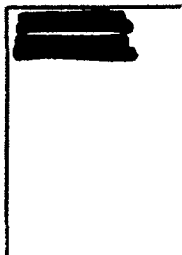

Requested Block Effective Date 15 Mar 2007

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider * Incumbent Local Exchange Carrier (ILEC)

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

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p> <p>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.</p>			
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			

e) 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-0300066)

Continue

Pooling Administration System

[Redacted]@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Monday, February 12, 2007**

OCN **9417**

Company Name **BELLSOUTH SO BELL**

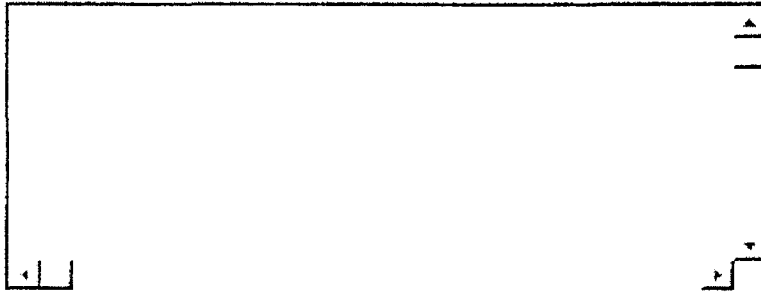
Rate Center **WEST PALM BEACH**

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

881, 882
(561)202 0,9, 233 9, 383 0-2,4, 493 0-5,9, 533, 540, 547, 582, 585, 586, 588, 656 3
561)355 0-7,9, 366, 514 0,2-4,9, 650, 651 1-9, 653, 655, 659, 671, 802, 803 0-6,9, 804 0,2,4-6,8-9, 805 820, 822, 832, 833, 835, 837, 838, 868 7

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 months^{2*}

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

F. Forecast - Next 12 months^{3*}

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]	21.753

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **66.858**

Explanation



REDACTED

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, section 52.15 (g)(3)(ii))

[Continue](#)

Pooling Administration System

@bridge.bellsouth.com (SP)

[Sign Out](#)

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

Your utilization calculates to **66.858 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

[Submit](#)

West Palm Beach
Utilization Summary
Report

Attachment 2

REDACTED

Exchange	Central Office	Wire Center CLLI	Number Blocks	Avg Growth Per Month	Available TNs	MTE	Utilization
West Palm Beach	Gardens	WPBHFLGRDS0	138				
West Palm Beach	Greenacres	WPBHFLGADS0	177				
West Palm Beach	Haverhill	WPBHFLHDS0	165				
West Palm Beach	Haverhill	WPBHFLHRS0	10				
West Palm Beach	Lake Worth	WPBHFLLEDS0	105				
West Palm Beach	Main Annex	WPBHFLANDS0	189				
West Palm Beach	Riviera Beach	WPBHFLRB84E	100				
West Palm Beach	Royal Palm Beach	WPBHFLRPDS0	127				

Customer Contact Information

[REDACTED]