

ORIGINAL

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150 South Monroe Street
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070229-TL

March 30, 2007

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the St. Johns exchange (St. Augustine - Main)

Dear Ms. Cole:

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 / *MAN*
Manuel A. Gurdian

RECEIVED-FPSC
07 MAR 30 PM 3:13
COMMISSION
CLERK

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

DOCUMENT NUMBER-DATE

02774 MAR 30 8

FPSC-COMMISSION CLERK


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

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

First Class U.S. Mail this 30th day of March, 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
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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 St. Johns exchange)
(St. Augustine – Main))
_____)

Docket No. 070229-7L
Filed: March 30, 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 St. Johns 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 provision provides that a carrier may challenge NeuStar’s decision to deny numbering resources to the appropriate regulatory authority.

DOCUMENT NUMBER-DATE

02774 MAR 30 05

FPSC-COMMISSION CLERK

BACKGROUND AND REQUEST FOR RELIEF

4. The St. Johns exchange consists of five (5) switching entities that utilize numbering resources: St. Augustine Shores (STAGFLSHRS0), St. Augustine Main (STAGFLMADS0), St. Augustine Beach Shores (STAGFLBSRS0), Mandarin Lemonwood (MNDRFLLWRS0), and St. Augustine Worldgolf (STAGFLWGRS0).

5. On March 22, 2007, AT&T Florida requested additional numbering resources from NeuStar for the St. Augustine Main (STAGFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested six (6) blocks to meet the request of a specific customer for 5,300 consecutive numbers in the format of NPA NXX-3XXX-8XXX.

6. At the time of the code request, the St. Johns exchange had a MTE of 38.27 and a utilization of 66.63%, while the St. Augustine Main (STAGFLMADS0) switch had a MTE of 28.64.

7. On March 22, 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 St. Johns 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 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 FCC's 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:

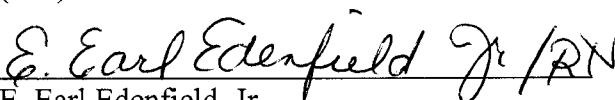
1. The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the St. Johns exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the St. Johns exchange as discussed above.

Respectfully submitted this 30th day of March, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA



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AT&T Southeast
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763

672812

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, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

REDACTED

Attachment 1

Pooling Administration System

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

Sign Out

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: 3535 COLONNADE PKWY
City: BIRMINGHAM
State: AL
Zip: 35444

Contact Name [Redacted]
Contact Address [Redacted]
City [Redacted] State AL
Zip [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 State CA
Zip 94520
Telephone (925) 363-8730 Fax (925) 363-7697
E-mail dara.sodano@neustar.biz

1.2 General Information

LRN Needed No
NPA 904 LATA * 452
OCN 9417-BELLSOUTH SO BELL
Parent Company OCN * 9417
Number of Thousands-Blocks Requested 6
Switch Identification (Switching Identity/POI) STAGFLMADSO
City or Wire Center Name

REDACTED

Rate Center * ST JOHNS	Rate Center Sub Zone
1.3 Dates	
Date of Application * Thursday, March 22, 2007	
Requested Block Effective Date * 22 Apr 2007	
Request Expedited Treatment <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
1.4 Type of Service Provider Requesting the Thousands-Block	
a) Type of Service Provider * Incumbent Local Exchange Carrier (LEC)	
b) Primary type of service Blocks to be used for * Wireline	
c) Thousands-Block(s) (NPA-NXX-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.	
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any	
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 <input type="checkbox"/> Yes	
Growth block for rate center <input checked="" type="checkbox"/> Yes	
Change block N/A	

REDACTED

Disconnect block N/A

Remarks
BLOCKS NEEDED FOR SPECIFIC CUSTOMER REQUE

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

bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet TN Level

Date Thursday, March 22, 2007

OCN 9417

Company Name BELLSOUTH SO BELL

Rate Center ST JOHNS

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

[Empty table area for listing codes]

Name of Block Applicant [REDACTED]
Title [REDACTED]
Telephone Number [REDACTED]
Fax Number [REDACTED]
E-Mail [REDACTED]@bellsouth.com

REDACTED

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 * 0

List excluded Code(s) or Block(s)

--

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]

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]	31.155
2	[REDACTED]	32.578
3	[REDACTED]	34.000

REDACTED

4	[REDACTED]	35.422
5	[REDACTED]	36.845
6	[REDACTED]	38.267

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **66.634**

Explanation



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

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

Sign Out

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

Your utilization calculates to **66.634 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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St. Johns
Utilization Summary
Report

Attachment 2

REDACTED

Exchange	Central Office	Wire Center CLLI	Number Blocks	Avg Growth Per Month	Available TNs	MTE	Utilization
St. Johns	Shores	STAGFLSHRS0	20	114			
St. Johns	Main	STAGFLMADS0	97	338			
St. Johns	Beach Shores	STAGFLBSRS0	20	82			
St. Johns	Mandarin Lemonwood	MNDRFLLWRS0	30	73			
St. Johns	Worldgolf	STAGFLWGRS0	34	97			

Customer Contact Information

[REDACTED]