



ORIGINAL

Tracy Hatch  
AT&T Legal  
Senior Counsel - Florida

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150 S. Monroe Street  
Tallahassee, FL 32301  
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May 4, 2007

Mrs. Ann Cole  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED 7:30  
07 MAY -4 PM 4:36  
COMMISSION  
CLERK

070296-TX

Re: Request for Waiver of Pooling Administrator's Denial of AT&T's Request to NeuStar for 1,000 Numbers to Meet a Specific Customer Need

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 03800-07. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.

Dear Mrs. Cole:

AT&T respectfully submits this request for application of a "safety valve" for NXX-X acquisition in the state of Florida. By this letter, AT&T requests that the Florida Public Service Commission ("Commission") overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of AT&T's application for a block of telephone numbers and that the Commission authorize the PA to release the requested block so that AT&T may serve its customer.

This request is based on the Federal Communications Commission ("FCC") Rules at 47 C.F.R. 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").<sup>1</sup> A Florida customer has requested that AT&T provide a block of 1000 numbers for its business in the Jacksonville rate center.<sup>2</sup> AT&T has developed a communications plan that the customer will implement and consequently assign the numbers within 180 days of the numbers being made available to the enterprise.

The customer's request is for 1000 numbers in an 8 block (904-NXX-8XXX). This will ensure compatibility with their existing internal dial plan. There are currently 53 blocks in the

- CMP 1
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- IR \_\_\_\_\_
- JCL 1
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_

DOCUMENT NUMBER - DATE  
03799 MAY -4 2007  
FPSC-COMMISSION CLERK

<sup>1</sup> These guidelines may be found on the INC web site: <http://www.atis.org/inc/docs.asp>  
<sup>2</sup> AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions. See Attachment 1, Company-Proprietary customer letter.

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number pool for this rate center; four of which are 8 blocks and 2 of the 4 are non-contaminated such that they would satisfy the customer's need.<sup>3</sup>

The Jacksonville rate center of the 904 area code began number pooling on April 1, 2001. Consequently, numbering resource acquisition by a pooling carrier is attained by interfacing with the PA<sup>4</sup>.

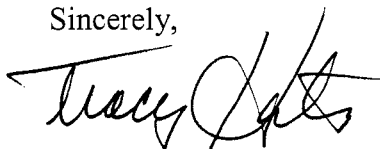
On April 27, 2007, AT&T submitted a "Thousand Block Application Form Part 1A" and a "Month-to-Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA<sup>5</sup> via the Pooling Administration System ("PAS"). One thousands block, in the Jacksonville rate center, was requested. AT&T received an error message indicating the request would not process through the system without a waiver.<sup>6</sup> The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources will exhaust within 6.0 months, AND meet the 75% utilization level. The error message indicated that neither threshold was met.

Although AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, AT&T's existing telephone resources cannot satisfy its customer's specific need. AT&T acknowledges the Commission's cooperation with similar "safety valve" requests in the past and appreciates its consideration herein. AT&T respectfully requests that the Commission overturn the PA's decision in the interest of our customer.

Attachments 1 and 2 to this request contain confidential proprietary business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, AT&T requests that the highlighted information contained in Attachments 1 and 2 be treated by the Commission as confidential and withheld from public inspection. In accordance with Rule 25-22.006, please find enclosed one copy of Attachments 1 and 2 with the confidential information highlighted and two redacted copies.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Hatch", written in a cursive style.

Tracy Hatch

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<sup>3</sup> See Florida 727 NPA STPETERSBG Rate Center: <http://nationalpooling.org/reports/index.htm>

<sup>4</sup> The federal rules in 47 C.F.R. 52.15 generalize responsibilities of NANPA and the PA under the heading "Central office code administration".

<sup>5</sup> A copy of the Part 1A and MTE worksheet are appended. AT&T asks the Commission to treat the information contained as confidential by the Commission. See Attachment 2.

<sup>6</sup> A copy of the error message is appended to the Part 1A and MTE forms. AT&T asks the Commission to treat the information contained as confidential by the Commission. See Attachment 2.

ATTACHMENT 1

**(REDACTED)**



April 26, 2007

AT&T Number Administration/Code Administration,

This Letter of Intent, is for [redacted] request 1000 DID numbers for [redacted]

[redacted] agrees to activate the numbers requested within 180 days from AT&T's receipt of the requested numbers. [redacted] intends to order service using these numbers immediately after required testing is performed by AT&T. This service will be provided in the [redacted] rate center using the SE switch.

Please indicate restricted blocks, citing the reason (e.g., PBX limitation, dial plan conflict)

- X Block 0 (0000-0999) Technical Restriction: Dial Plan Conflict
- X Block 1 (1000-1999) Technical Restriction: Dial Plan Conflict
- X Block 2 (2000-2999) Technical Restriction: PBX limitation
- X Block 3 (3000-3999) Technical Restriction: PBX limitation
- X Block 4 (4000-4999) Technical Restriction: PBX limitation
- X Block 5 (5000-5999) Technical Restriction: Dial Plan Conflict
- X Block 6 (6000-6999) Technical Restriction: PBX limitation
- X Block 7 (7000-7999) Technical Restriction: Dial Plan Conflict
- Block 8 (8000-8999) Technical Restriction: \_\_\_\_\_
- X Block 9 (9000-9999) Technical Restriction: Dial Plan Conflict

PLEASE PROVIDE A DETAILED EXPLANATION OF YOUR BUSINESS, OTHER LOCATIONS FOR THIS BUSINESS AND THE POSSIBILITY OF GROWTH.

Sincerely,

Ed Jenkins

----- the 10 bullet points referenced in the sample letter above.



NUMBER ADMINISTRATION DEPARTMENT / LETTER OF INTENT (LOI)

FAX NUMBER: 210-893-2281

1. Letter needs to be on the Company's letterhead.
2. Letter must be dated and signed.
3. Service (ADL or LNS)
4. Rate Center
5. Amount of TNs needed
6. Switch CLLI code (this is needed so we can verify the switch can handle the amount of TNs being requested. There are quite a few LNS switches that are capped or limited. This also will clear up if the customer is requesting ADL TNs or LNS TNs.)
7. Letter must include if there are any special requirements (such as the TNs must be in a specific range or consecutive, PBX or any other technical restrictions).
8. Letter must state that the TNs will be working within 180 days from LERG effective date.
9. Letter must include specific Business Explanation and growth.
10. If any data is missing, the LOI will be rejected.

Updated 4/7/06

ATTACHMENT 2

**(REDACTED)**

## Pooling Administration System

flloper (SP)

Sign Out

### Request Resources

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State	<input type="text"/>
NPA	<input type="text"/>
Rate Center	<input type="text"/>
OCN	<input type="text"/>
Type of Application	<input type="text"/>
Quantity of Blocks Requested	<input type="text"/>

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**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

lloper (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 **AT&T LOC - NY**  
Headquarters Address: **ONE AT&T WAY**  
City: **BEDMINSTER**  
State: **NJ**  
Zip: **07921**

Contact Name **Ms Lisa A Loper**  
Contact Address **ONE AT&T WAY**  
City **BEDMINSTER**  
Zip **07921**

State **NJ**

Telephone **(908) 234-7622**

Fax **(908) 234-8044**

E-mail **lloper@att.com**

#### Pooling Administrator <sup>ii</sup>:

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 <sup>iii</sup> [REDACTED]

NPA [REDACTED]

LATA \* [REDACTED]

OCN <sup>iv\*</sup> [REDACTED]

Parent Company OCN \* [REDACTED]

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) <sup>v\*</sup> [REDACTED]

City or Wire Center Name [REDACTED]

Rate Center <sup>vi</sup> [REDACTED]

Rate Center Sub Zone [REDACTED]

### 1.3 Dates



Date of Application <sup>vii</sup> **Friday, April 27, 2007**

Requested Block Effective Date <sup>viii</sup> [REDACTED]

Request Expedited Treatment  Yes  No

**1.4 Type of Service Provider Requesting the Thousands-Block**

a) Type of Service Provider \* [REDACTED]

b) Primary type of service Blocks to be used for \* [REDACTED]

<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>	[REDACTED]	[REDACTED]	[REDACTED]
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>	[REDACTED]	[REDACTED]	[REDACTED]

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**

Remarks [REDACTED]

# Pooling Administration System

lloper (SP)

Sign Out

## Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>

Date **Friday, April 27, 2007**

OCN **7421**

Company Name **AT&T LOC - NY**

Rate Center [REDACTED]

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

[REDACTED]

Name of Block Applicant **Ms Lisa A Loper**

Title **Assistant Manager**

Telephone Number **(908) 234-7622**

Fax Number **(908) 234-8044**

E-Mail **lloper@att.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)

[REDACTED]

### E. Growth History - Previous 6 months<sup>2</sup> \*

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

MTE

F. Forecast - Next 12 months<sup>3</sup> -

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 Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

<b>Block Requested</b>	<b>A. Available Numbers</b>	<b>H. Months to Exhaust</b>
[REDACTED]	[REDACTED]	[REDACTED]

I. Utilization<sup>5</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 [REDACTED]

Explanation

[REDACTED]

<sup>1</sup>A 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.

<sup>2</sup>Net 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.

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

<sup>4</sup>To 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)).

<sup>5</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

# Pooling Administration System

 Home (SP)

Sign Out

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

Your utilization calculates to 55.537 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



State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** 5/4/07  
**TO:** Mr. Hatch,  
**FROM:** R. Nettles, Division of the Commission Clerk &  
Administrative Services  
**RE:** **Acknowledgment of Receipt of Confidential Filing**

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03800-07

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 070296 or (if filed in an undocketed matter) concerning Attachment 1 + 2 of Request for Waiver, and filed on behalf of AT+T. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-6770.

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