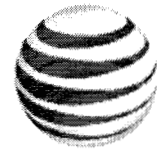


ORIGINAL



at&t

Tracy Hatch  
AT&T Legal  
Senior Counsel – Florida

Suite400  
150 S. Monroe Street  
Tallahassee, FL 32301  
850-425-6360

June 29, 2007

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

COMMISSION  
CLERK

07 JUN 29 PM 4:47

RECEIVED-FPSC

070392-TX

Re: Request for Waiver of Pooling Administrator's Denial of AT&T's Request to NeuStar for 20 Numbers to Meet a Specific Customer Need

Dear Ms. Cole:

AT&T respectfully submits this request for application of a "safety valve" for NPA-NXX-X acquisition in the state of Florida. 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.

CMP 1  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL 1  
 OPC \_\_\_\_\_  
 RCA \_\_\_\_\_  
 SCR \_\_\_\_\_

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 20 numbers for its business in the Winter Park rate center.<sup>2</sup> AT&T has developed a plan that the customer will implement and thus assign the numbers within 180 days of the numbers being made available to the enterprise. The customer's request is for 20 numbers in any NPA-NXX (321-NXX-2XXX or

<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.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 05242-07. 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.

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OTH ICOM records

407-NXX-2XXX) but must be 2100-2119 for compatibility with their existing internal dial plan. There are currently 62 blocks in the Winter Park pool, consisting of NPAs 321 and 407. There are 5 non-contaminated 2 blocks that would satisfy the customer's need.<sup>3</sup>

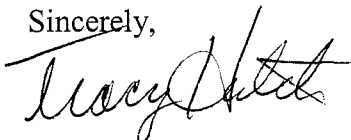
The Winter Park rate center of the 321/407 area code began number pooling in May 2002. Consequently, numbering resource acquisition by a pooling carrier is attained by interfacing with the PA<sup>4</sup>. On June 26, 2007, AT&T submitted a "Thousand Block Application Form Part 1A" and a "Month-to-Exhaust 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 Winter Park 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. The name, address and telephone number of the AT&T customer to whom requests for verification may be addressed is included in Attachment 3.

Attachments 1, 2 and 3 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, 2 and 3 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 (850) 425-6360.

Sincerely,



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.

State of Florida



**CONFIDENTIAL**

**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-**

DATE: 6/29/07  
 TO: AT+T/Hatch  
 FROM: Dmenasco, Division of the Commission Clerk &  
 Administrative Services  
 RE: **Acknowledgment of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 070392<sup>wp</sup> or (if filed in an undocketed matter) concerning Attachments 1-3, 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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