



Manuel A. Gurdian  
Attorney  
Legal Department

AT&T Florida  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301

T: (305) 347-5561  
F: (305) 577-4491  
[manuel.gurdian@att.com](mailto:manuel.gurdian@att.com)

080129

**REDACTED**

RECEIVED-FPSC  
08 MAR -3 PM 4:24  
COMMISSION  
CLERK

March 3, 2008

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

**Re: Petition for the Expedited Review of Growth Code Denial by the North American Numbering Administrator for the (Lake City) Exchange**

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 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  
Gregory R. Follensbee  
E. Earl Edenfield, Jr.  
Lisa S. Foshee

- CMP
- COM
- CTR
- ECR
- GCL 2
- OPC
- RCA
- SCR
- SGA
- SEC
- OTH 1

DOCUMENT NUMBER-DATE

01603 MAR-3 08

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Petition for the Expedited Review of Growth Code Denial**  
**by the North American Numbering Administrator**  
**for the (Lake City) Exchange**

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

First Class U.S. Mail this 3<sup>rd</sup> day of March, 2008 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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth )  
Code Denial by the North American Numbering )  
Administrator for the Lake City Exchange )  
(Lake City) )  
\_\_\_\_\_ )  
Docket No. )  
Filed: March 3, 2008 )

**PETITION FOR EXPEDITED REVIEW OF NXX 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 North American Numbering Plan Administrator’s (“NANPA”) denial of AT&T Florida’s request for additional numbering resources in the Lake City 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. NANPA is an independent non-governmental entity, which is responsible for administering and managing the numbering resources. See 47 C.F.R. § 52.13 (d).

**JURISDICTION**

3. The Commission has jurisdiction of this matter pursuant to Industry Numbering Committees (INC) NPA Code Relief Planning & Notification Guidelines Section 2.10 and Central Office Code (NXX) Assignment Guidelines Section 5.2. The

DOCUMENT NO. DATE  
01603-08 03/03/08  
FPSC - COMMISSION CLERK

provisions provide that a carrier may challenge NANPA's decision to deny numbering resources to the appropriate regulatory authority.

### **BACKGROUND AND REQUEST FOR RELIEF**

4. The Lake City exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: Lake City (LKCYLEMADS0).

5. On February 22, 2008, AT&T Florida requested additional numbering resources from NANPA for the Lake City (LKCYLEMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to meet the request of a specific customer for 600 telephone numbers in the format of 386-XX2-77XX through 82XX in a non-pooling exchange.

6. At the time of the code request, the Lake City exchange had a MTE of 15.72 and a utilization of 82.1%.

7. On February 22, 2008, NANPA 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 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 NANPA's decision to deny a request for numbering resources.

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 NANPA's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NANPA'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) As a result of NANPA'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 NANPA to deny AT&T Florida's request for additional numbering resources for the Lake City exchange; and
2. The Commission direct NANPA to provide the requested numbering resources for the Lake City exchange as discussed above.

Respectfully submitted this 3<sup>rd</sup> day of March, 2008.

AT&T FLORIDA



---

E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



---

Lisa S. Foshee

AT&T Southeast

Suite 4300, AT&T Midtown Center

675 W. Peachtree St., NE

Atlanta, GA 30375

705716

### Pooling Administration System

[Redacted]@att.com (SP)

• Sign Out

Time : 02/25/2008 02:30:01 PM EST

Printable Version  
August 6, 2001

- Individual Block Requests
- CO/NXX Code Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

Appendix 3

#### MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **386-LAKE CITY-FL-188679**

Date: **02/22/2008**

OCN: **9417**

Company Name: **BELLSOUTH SO BELL**

Rate Center: **LAKE CITY**

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

Name of Block Applicant: [Redacted]

Signature: [Redacted]

Title: [Redacted]

Telephone No.: [Redacted]

FAX No.: [Redacted]

E-mail: [Redacted]@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):

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History - Previous 6 months<sup>2</sup>: [Redacted]

F. Forecast - Next 12 months<sup>3</sup>: [Redacted]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): [Redacted]

DOCUMENT NO. DATE

01603-08 01031 of FPSC - COMMISSION CLERK

**REDACTED**

H. Months to Exhaust<sup>4</sup> = Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1		14.084
2		15.72

I. Utilization<sup>5</sup> = Assigned Numbers(B) - Excluded Numbers(D) X 100 = **82.069**

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation: \_\_\_\_\_

<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, section 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))

**Back**

Question? Email us  
© 1997-2012 NeuStar, Inc.  
Legal Notice

[REDACTED]

**REDACTED**

**From:** dara.sodano@neustar.biz  
**Sent:** Friday, February 22, 2008 4:16 PM  
**To:** [REDACTED]@att.com; [REDACTED]@att.com; [REDACTED]@att.com  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 386-LAKE CITY-FL-188679



### Pooling Administration System

Dated 22 February 2008

November 21, 2003  
ATIS-0300066.at3

Attachment 3

#### Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 386-LAKE CITY-FL-188679

**Date of Application:** 02/22/2008      **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 02/22/2008      **Date of Response:** 02/22/2008

**Service Provider Name:** BELLSOUTH SO BELL  
**(Telcordia™ LERG™ Routing Guide ) OCN:** 9417

**NPAC SOA SPID :** \_\_\_\_\_

#### Pooling Administrator Contact Information:

**Dara Sodano** \_\_\_\_\_ **Phone:** 925-363-8730  
**Signature of Pooling Administrator**  
**Dara Sodano** \_\_\_\_\_ **Fax:** 925-363-7697  
**Name (print)**  
**Email:** dara.sodano@neustar.biz

**NPA-NXX or NPA-NXX-X :** \_\_\_\_\_

**Block Assigned:** \_\_\_\_\_  
**Block Reserved :** \_\_\_\_\_  
**Block Reservation** \_\_\_\_\_  
**Expiration Date :** \_\_\_\_\_  
**Block/Code Modified :** \_\_\_\_\_

3

**REDACTED**

Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated(Yes or No) :

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): <sup>1</sup>

Rate Center:

Rate Center Sub Zone:

**LKCYFLMADS0**

**LAKE CITY**

**Form Complete, request denied.**

Explanation:

**DR-00: You do not meet the MTE requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

**Request withdrawn.**

Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

4

**REDACTED**

**Customer Information**

