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October 7, 2008

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Embarq
Mailstop: FTLH00102
1313 Blair Stone Rd
Tallahassee, FL 32301
embarq.com

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

Re: Docket No. 0806291-TL, Petition for Expedited Review of Growth Code Denials by the North American Numbers Plan Administration for the Winter Garden Exchange

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. (Embarq), are the original and seven copies of Embarq's redacted Petition for expedited Review of NXX-X Code Denial, which we ask that you file in the captioned new docket.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850-599-1560.

Sincerely,

Susan S. Masterton
Susan S. Masterton
Senior Counsel

Enclosure

COM ___
ECR ___
GCL ___
OPC ___
RCP ___
SSC ___
SGA ___
ADM ___
CLK ___

Susan S. Masterton
SENIOR COUNSEL
Voice: (850) 599-1560
Fax: (850) 878-0777
susan.masterton@embarq.com

DOCUMENT NUMBER-DATE
09488 OCT-7 8
COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. _____

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S.
Mail this 7th day of October, 2008 to the following:

Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Tom Foley, Relief Planner
Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779-2327

Susan S. Masterton

Susan S. Masterton
del

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the North American Numbering Plan Administration for the Winter Garden Exchange

Docket No. 080629-TL
Date Filed: October 7, 2008

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Embarq Florida, Inc. (Embarq), 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-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's ("NeuStar") denial of Embarq's requests for additional numbering resources in the Winter Garden Exchange. In support of this petition, Embarq states:

PARTIES

1. Embarq is 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 the Industry Numbering Committee's (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

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BACKGROUND AND REQUEST FOR RELIEF

4. On March 31, 2000, the FCC issued Order No. 00-104 (“FCC 00-104” or the “Order”) in the Numbering Resource Optimization docket (Docket No. 99-200). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of telephone numbers and to avoid further exhaustion of telephone numbers under the NANP.

5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. FCC Order at § 105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing numbering inventory within the applicant’s rate center will be exhausted within six months of the application. Prior to the ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant’s existing number inventory within the applicant’s serving switch to exhaust within a specific months-to-exhaust (“MTE”) of the code application in order for a code to be assigned or for the carrier to prove that it was unable to meet a specific customer’s request with its current inventory of numbers. The FCC stated that the shift to a “rate center” basis for determining the need for new numbering resources was intended to “more accurately reflect how numbering resources are assigned” and to allow “carriers to obtain numbering resources in response to specific customer demands.” FCC Order at ¶ 105.

6. On December 29, 2000, the FCC also released FCC 00-429, which reaffirmed FCC 00-104 and required carriers to also meet a 60 percent initial utilization threshold. FCC 00-429 at ¶ 26. Based on these two FCC orders, carriers are required to meet six MTE criteria as well as a utilization threshold on a rate center/exchange basis in order to be granted additional numbering resources. Id. At ¶ 29.
7. In FCC 00-104, the FCC directed the industry and the Pooling Administrator to comply with the INC Pooling Guidelines. FCC 11-104 ¶ 183. Pursuant to the INC Guidelines, in order to obtain thousand-block allocations, the carrier must demonstrate that its existing numbering resources for the rate center will exhaust within six (6) months and also have a utilization of 75 percent for the specific rate center. See INC Guidelines Section 4.3 (c) [THOUSANDS-BLOCK NUMBER (NXX-X) POOLING ADMINISTRATION GUIDELINES (TBPAG) dated May 20, 2005] and Appendix 3. These requirements are known as the six (6) months-to-exhaust (“MTE”) and utilization threshold.
8. Embarq has utilized mechanisms such as number pooling to manage its numbering resources in the most efficient manner. However, Embarq is required in this instance to petition the Commission for relief.
9. On May 25, 2001, BellSouth petitioned the Commission to develop an expedited process to review NANPA’s denial of a request for additional numbering resources to minimize the delay carriers experience in attempting to challenge a denial by NANPA. As a result of BellSouth’s Petition and the Commission’s efforts to make numbering resources available to carriers, the

commission issued Order No. PSC-01-1973-PCO-TL setting forth an expedited code denial process. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

10. The Winter Garden Exchange consists of one (1) central office and one (1) switching entity that utilizes numbering resources.
11. On October 3, 2008, Embarq Florida requested additional numbering resources from NeuStar for the Winter Garden exchange. See Attachment 1. Specifically, in order to meet the telephone number needs of one of its customers, Embarq requested 200 new consecutive DID numbers in the Winter Garden (WNGRFLXADS0) wire center. Embarq cannot currently meet this request given the inventory of numbers available at this time in this switch.
12. At the time of the code request, the Winter Garden exchange had an MTE of much longer than six (6) months and a utilization of 86%. There are no blocks of un-assigned numbers large enough to meet the request of this customer in this switch.
13. On October 3, 2008, NeuStar denied Embarq's request for additional numbering resources because Embarq requested more blocks than it will exhaust in six (6) months, notwithstanding the fact that Embarq's Winter Garden switch is at 86% utilization and does not have available blocks of numbers in sufficient quantity to meet the customer's requirements. See Attachment 1.

14. Embarq's request for additional numbering resources to meet this customer's requirement in the Winter Garden Exchange would not materially impact exhaustion of available numbers in the 407 area code.
15. As discussed above, both the FCC Order and INC guidelines provided that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 11.1(c).
16. Under earlier 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 and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.
17. Embarq's inability to provide this customer with the requested blocks of numbers prevents Embarq from providing the quality of service this customer desires and expects.
18. This Commission has previously received similar requests from numerous carriers, both ILECs and CLECS in which the carriers have asked the PSC to overrule a decision of NANPA and NeuStar. The Commission has granted these requests.

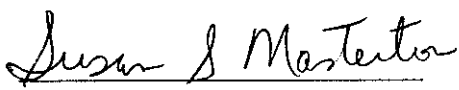
19. Embarq requests that the Commission reverse NeuStar's decision to withhold numbering resources from Embarq on the following grounds:

- (a.) NeuStar's denial of numbering resources to Embarq interferes with Embarq's ability to service its customers within the State of Florida.
- (b.) As a result of NeuStar's denial of Embarq's request for additional numbering resources, Embarq will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, Embarq Florida, Inc. requests:

- 1. The Commission review the decision of NeuStar to deny Embarq's request for additional numbering resources for the Winter Garden exchange, and
- 2. The Commission directs NeuStar to provide the requested numbering resources for the Winter Garden exchange as discussed above.

Respectfully submitted this 7th day of October, 2008.


Susan S. Masterton
Counsel for Embarq Florida, Inc.
P.O. Box 2214
Tallahassee, FL 32316-2214
850-599-1560

Appendix 3 - Modified August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level 1
(Thousands-Block Number Pooling Growth Block Request)

Date: 10/03/2008 OCN: 0341 Company Name: EMBARQ

Rate Center: WINTERGRDN

Name of Block Applicant: _____ Signature: _____

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): (407) 654, 656, 877, 905

Title: _____ Telephone No.: _____ FAX No.: _____

E-Mail: _____

- 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 ²	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
F. Forecast -- Next 12 months ³	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	[REDACTED]											
H. Months to Exhaust ⁴	$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} =$						0					
I. Utilization ⁵	$\frac{\text{Assigned Numbers (B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources (C)} - \text{Excluded Numbers (D)}} * 100 =$						86%					

Explanation: We have a customer, [REDACTED] who is requesting 200 consecutive DID numbers which we are unable to provide in the WINTERGRDN rate center. Customer would like to activate the numbers in one month. Customer contact person is [REDACTED] contact number [REDACTED]. If this request is denied, please begin the appeal process.

1. 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.
 2. 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.
 3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
 4. 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) (ii)).
 5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii)).

10/03/2008 11:01 AM EMBARQ 407-884-1992

Pooling Administration System

Terry.Woodford@embarq.com (SP)

[Sign Out](#)

Time : 10/03/2008 04:05:41 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
 - Create/Modify Forecast
- Search Forms
- Reports
- User Profile

Thousands-Block Forecast	
Select NPA(s)	407
Select the first month and year	Oct 2008
Select OCN	0341-EMBARQ FLORIDA, INC.
<input type="button" value="Continue"/> <input type="button" value="Cancel"/>	

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Pooling Administration System

Terry.Woodford@embarq.com (SP)

Time : 10/03/2008 04:08:07 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
 - Creates/Modify Forecast
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- User Profile

Thousands-Block Forecast Report
 Service Provider Name: EMBARQ FLORID
 OCN: 0341
 Phone: 407-889-1661 Ext
 Fax #: 407-884-1992
 E-Mail: Terry.Woodford@
 Forecast Report Date 03 October 2008

Rate Center *	NPA	Oct2008	Nov2008	Dec2008	Jan2009	Feb2009	Mar2009	Apr
WINTERGRDN	407							

Submit

Rate Center	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
APOPKA								
CELEBRATN								
KENANSVL								
KISSIMMEE								
LKBONAVIST								
MONTVERDE								
REEDYCREEK								
ST CLOUD								

Directions:

Please provide the forecasted number of thousands blocks in each Rate Center that your company e months.
 Only the total quantity of thousands blocks that are forecasted should be entered. Do not include in t already in your inventory. If full NXX(s) is/are forecasted, please reflect this in thousands blocks, e.g. If any of the forecasted demand above includes the need for a new NXX due to a LRN, please indica LRN = 1.

LRN Required	NPA	Oct2008	Nov2008	Dec2008	Jan2009	Feb2009	Mar2009	Apr
	407							

If further assistance is required, please contact the P

Submit Forecast Cancel

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Time : 10/03/2008 04:06:55 PM EDT

Your forecast has been successfully submitted.

[Back to Inbox](#)

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
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• Sign Out

Time : 10/03/2008 04:07:28 PM EDT

- [-] [-] Individual Block Requests
 - [-] [-] New Block Request
 - [-] [-] New Block Reservation
 - [-] [-] Assign/Cancel/Extend Reservation
 - [-] [-] Block Modification
 - [-] [-] Block Disconnect
 - [-] [-] Saved Block Requests
 - [-] [-] Modify Pending Request
- [-] [-] CO/NXX Code Requests
- [-] [-] Confirm Resources In Service
- [-] [-] Donate Blocks
- [-] [-] Submit Forecast
 - [-] [-] Create/Modify Forecast
- [-] [-] Search Forms
- [-] [-] Reports
- [-] [-] User Profile

Request Resources

State*

NPA*

Rate Center*

OCN *

Quantity of Blocks Requested

* If requesting more than one block, do you want multiple effective dates? * Yes No

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Time : 10/03/2008 04:07:55 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
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- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
 - Create/Modify Forecast
- Search Forms
- Reports
- User Profile

Part 1A

Type of Application : New Block

[View Pool Replenishment Status](#)

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user

Block Applicant :

Company Name **EMBARQ FLORIDA, INC.**
 Headquarters Address: **6500 Sprint Parkway**
 City: **Overland Park**
 State: **KS**
 Zip: **66251**

Contact Name **Terry Woodford**
 Contact Address **555 Lake Border Drive**
 City **Apopka** State **FL**
 Zip **32703**
 Telephone **407-889-1661** Fax **407-199**
 E-mail **Terry.Woodford@embarq.com**

Pooling Administrator II:

Contact Name **Dara Sodano**
 Contact Address **1800 Sutter St**
 City **Concord** State **CA**
 Zip **94520**
 Telephone **925-363-8730** Fax **925-769**
 E-mail **dara.sodano@neustar.biz**

1.2 General Information

NPA **407** LATA * **458**
 OCN ^{iv} **0341-EMBARQ FLORIDA, INC.**
 Parent Company OCN
 Number of Thousands-Blocks Requested **1**
 Switch Identification (Switching Identity/POI)^{v*} City or Wire Center Name
 Rate Center ^{vi} **WINTERGRDN** Rate Center Sub Zone

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1.3 Dates

Date of Application

Request Expedited Treatment Yes No

Requested Effective Date (MM/DD/YYYY)

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider

b) Primary Type of Service Blocks to be used for

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

Pooling Administration System

this assignment, if any

1.5 Type of Request*

- Initial block for rate center Growth block for rate center
Or

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying code may not yet be activated in the PSTN as loaded in the NPAC on the block effective date.

Remarks: We have a customer, [REDACTED], who is requesting 200 consecutive DID numbers which we are unable to provide in the WINTERGRDN rate center. Customer would like to activate the numbers in one month. Customer contact person is [REDACTED] contact number [REDACTED]. [REDACTED] If this request is denied, please begin the appeal process.

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best knowledge and that this application has been prepared in accordance with the Thousands-Block (NX) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org>) by contacting Inc@atis.org as of the date of this application.

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact Information requires that Service Providers supply under "Block Applicant" the cc name, company headquarters address, a contact within the company, an address where the contact may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ F Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration. In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem facilities based provider¹. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which numbering resource is to be used. Service Providers also may indicate their preference for a particular

Pooling Administration System

Terry.Woodford@embarq.com (SP)

Time : 10/03/2008 04:16:26 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
- Confirm Resources In Service
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- User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Lev

Date Friday, October 3, 2008

OCN 0341

Company Name EMBARQ FLORIDA, INC.

Rate Center WINTERGRDN

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

(407) 654, 656, 877, 905

Name of Block Applicant Terry Woodford

Title Engineer II

Telephone Number 407-889-1661

Fax Number 407-884-1992

E-Mail Terry.Woodford@embarq.com

A. Available Numbers * [REDACTED]

B. Assigned Numbers * [REDACTED]

C. Total Numbering Resources * [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ² * [REDACTED]

List excluded Code(s) or Block(s)

NONE

E. Growth History - Previous 6 months³ *

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

F. Forecast - Next 12 months⁴ *

--	--	--	--

Pooling Administration System

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)

H. Months to Exhaust⁵ (Numbers Available for Assignment to customers (A) / Average Monthly Fore

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	1037.690

i. Utilization⁶ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (100

Explanation

We have a customer, [REDACTED] who is requesting 200 consecutive DID numbers which we are unable to provide in the WINTERGRDN rate center. Customer would like to activate the numbers in one month. Customer contact person is [REDACTED] contact number [REDACTED]. If this request is denied, please begin the appeal process.

[Print] [Cancel] [Save]

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting a resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

² Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code re

³ Net change in TNs no longer available for assignment in each previous month, starting with the most Month #1, and Month #6 as the current month.

⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.1

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Terry.Woodford@embarq.com (SP)

• Sign Out

Time : 10/03/2008 04:16:52 PM EDT

- [-] Individual Block Requests
 - [-] New Block Request
 - [-] New Block Reservation
 - [-] Assgn/Cancel/Extend Reservation
 - [-] Block Modification
 - [-] Block Disconnect
 - [-] Saved Block Requests
 - [-] Modify Pending Request
- [-] CO/NXX Code Requests
- [-] Confirm Resources In Service
- [-] Donate Blocks
- [-] Submit Forecast
 - [-] Create/Modify Forecast
- [-] Search Forms
- [-] Reports
- [-] User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver

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