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COMMISSION
CLERK

100305-TL

May 25, 2010

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

Re: Petition for Expedited Review of Growth Code Denial by the North American Numbering Plan Administrator for the Gainesville (Main DS1) Exchange

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Expedited Review of Growth 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.

COM _____
APA _____
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DOCUMENT NUMBER-DATE

04420 MAY 25 0

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denial by the North American Numbering)
Plan Administrator for the Gainesville (Main DSI))
exchange)

Docket No. 100305-TL

Filed: May 25, 2010

PETITION FOR EXPEDITED REVIEW OF GROWTH 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 requests for additional numbering resources in the Gainesville 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 numbering resources.

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 NUMBER DATE

04420 MAY 25 0

FPSC-COMMISSION CLERK

8. 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's 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) 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 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 CLECs have to

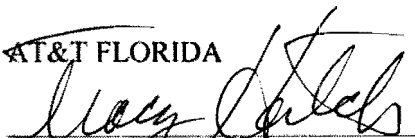
meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

(c) As a result of 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.

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 Gainesville exchange; and
2. The Commission direct NANPA to provide the requested numbering resources for the Gainesville exchange as discussed above.

Respectfully submitted this 25th day of May, 2010.

AT&T FLORIDA

E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

816454

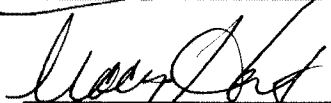
CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code
Denial by the North American Numbering Plan
Administrator for the Gainesville (Main DS1) Exchange

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

First Class U.S. Mail this 25th day of May, 2010 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


Mandel A. Gurdian

NANPA Logout

@att.com (SPA) Time : 05/24/2010 03:24 PM

Printable Version [Back](#)

Central Office Code (NXX) Assignment Request - Part 1

December 9, 2005

Tracking Number: 352-383159

Type of Application: New Change ¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:
 Company/Entity Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
 Headquarters Address: [REDACTED]
 City, State, Zip: Atlanta, GA, 30375
 Contact Name: [REDACTED]
 Contact Address: [REDACTED]
 City, State, Zip: [REDACTED]
 Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@att.com

Code Administrator:²
 Name: Michael Ortega
 Address: 46000 Center oak Plaza.
 City, State, Zip: Sterling, VA, 20166
 Phone: 571-434-5348 FAX: 571-434-5502

1.2 NPA: 352 NXX:³ [REDACTED] LATA: 454 OCN:⁴ 9417 Parent Company's OCN(s) 9400

Switching Identification(Switch Entity/POI) ⁵GSVLELMADS1
 Locality/City/Wire Center: [REDACTED] Rate Center:⁶GAINESVL
 Homing Tandem Operating Co:⁷ [REDACTED] Tandem Homing CLLI:⁸GSVLELMA01T

1.3 Dates: Date of Application: 05/17/2010 Request Effective Date:⁹ 07/15/2010
¹⁰07/15/2010

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Expedite Reason:

1.4 Type of company/entity requesting the code:

a) Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)
 b) Types of service: Wireline (e.g., Cellular - Type 2)
 c) Code Assignment Preference (Optional) REQ DIALING PATTERN OF [REDACTED] OR [REDACTED] LISTED IN ORDER OF PREFERENCE

d) Codes that are undesirable, if any EVERYTHING EXCEPT ABOVE

e) Type of change (Mark all that apply)

OCN-Intra-company¹¹ Switching Id Rate Center Tandem Homing CLLI

OCN-Inter-company¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain):

1.8 Part 2 is attached Part 2 is not attached for BIRRDS ^{14 15}

Additional Documentation is attached Additional Documentation is not attached

Comments:

REQUEST FULL CODE, IN NON-POOLING AREA, TO MEET CUSTOMER NEEDS.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/cic/inc/incdocs.htm>) as of the date of this application: ¹⁶

	Specialist	05/17/2010
Signature of Code Applicant	Title	Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character TelcordiaTM COMMON LANGUAGE CLLITM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

- ⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸This 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, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹Code applicants should request an effective date that is at least 59 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
- ¹⁰Requests for code assignment should not be made more than six months prior to the requested effective date.
- ¹¹Select if you are the current Code Holder
- ¹²Select if you are not the current Code Holder
- ¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- ¹⁴Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.
- ¹⁵WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45 calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.
- ¹⁶An incomplete form may result in delays in processing this request.

NANPA Logout

[REDACTED]@att.com (SPA) Time : 05/24/2010 03:24 PM

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Effective June 11, 2001 Appendix B

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Request for Additional Codes for Growth)

Date: 05/17/2010 Company Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: GAINESVL

NPA-NXXs included in growth calculation²: _____

Signature of Authorized Representative of Code Applicant: [REDACTED]

Title: Specialist Telephone No.: [REDACTED] FAX No.: [REDACTED]

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 150362

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
B. Previous 6-month growth history ⁴ [REDACTED]											
C. Forecast - Next months 1-12 ⁵ [REDACTED]											
D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): [REDACTED]											
E. Months to Exhaust ⁶ = $\frac{\text{Telephone Numbers(TNs) Available for Assignment(A)}}{\text{Average Monthly Forecast(D)}}$ = <u>63.08</u>											
F. Utilization Level ⁷ = $\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's}}$ X 100 = <u>51.36</u>											

4

Inventory

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

²Report on all resources for the requested geographic area, including newly acquired codes.

³Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁷Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, section 52.15 (g) (3) (ii)).

5

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[Redacted]@att.com (SPA)		Time : 05/24/2010 03:25 PM																																							
<ul style="list-style-type: none"> <input type="checkbox"/> Request For Resources <input type="checkbox"/> Part1/MTE <input type="checkbox"/> Reclamation <input type="checkbox"/> Search Forms <input type="checkbox"/> View Documents <input type="checkbox"/> CO Code Reports <input type="checkbox"/> User Profile 	<p style="text-align: center;">Printable Version <input type="button" value="Back"/></p> <p style="text-align: center;">Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request - Part 3 - ATIS-0300050.p3 Revised: February 9, 2004</p> <p style="text-align: center;">Administrator's Response/Confirmation Tracking Number: 352-383159</p> <table border="0" style="width: 100%;"> <tr> <td>Date of Application:</td> <td><u>05/17/2010</u></td> <td>Date of RECEIPT:</td> <td><u>05/17/2010</u></td> </tr> <tr> <td>Date of Response:</td> <td><u>05/21/2010</u></td> <td>Effective Date:</td> <td>_____</td> </tr> <tr> <td>Company/Entity Name:</td> <td><u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u></td> <td>Service Provider OCN:</td> <td><u>9417</u></td> </tr> <tr> <td>Contact Name:</td> <td><u>[Redacted]</u></td> <td>Phone:</td> <td><u>[Redacted]</u></td> </tr> <tr> <td></td> <td></td> <td>Email:</td> <td><u>[Redacted]@att.com</u></td> </tr> <tr> <td></td> <td></td> <td>Fax:</td> <td><u>[Redacted]</u></td> </tr> </table> <p>Code Administrator Contact Information:</p> <table border="0" style="width: 100%;"> <tr> <td><u>Michael Ortega</u></td> <td>Phone:</td> <td><u>571-434-5348</u></td> </tr> <tr> <td>Signature of Code Administrator</td> <td></td> <td></td> </tr> <tr> <td><u>Michael Ortega</u></td> <td>Fax:</td> <td><u>571-434-5502</u></td> </tr> <tr> <td>Name (print)</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Email:</td> <td><u>michael.ortega@neustar.biz</u></td> </tr> </table> <p style="margin-top: 20px;"> ____ NPA: <u>352</u> Code Assigned: ____ Date of NXX Code Assignment: ____ ____ Switch Identification(Switch Entity/POI): _____ Rate Center: <u>GAINESVL</u> </p> <p> ____ Code Reserved: _____ Date of Reservation: _____ Your code Reservation will be honored until: ____ Switch Identification (Switch Entity/POI): ____ </p> <p> ____ Form Incomplete Additional information required in the following sections(s) </p> <p> <u>X</u> Form Complete, code request denied. Explanation: _____ </p> <p> ____ Assignment activity suspended by the administrator. Explanation: _____ </p>		Date of Application:	<u>05/17/2010</u>	Date of RECEIPT:	<u>05/17/2010</u>	Date of Response:	<u>05/21/2010</u>	Effective Date:	_____	Company/Entity Name:	<u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u>	Service Provider OCN:	<u>9417</u>	Contact Name:	<u>[Redacted]</u>	Phone:	<u>[Redacted]</u>			Email:	<u>[Redacted]@att.com</u>			Fax:	<u>[Redacted]</u>	<u>Michael Ortega</u>	Phone:	<u>571-434-5348</u>	Signature of Code Administrator			<u>Michael Ortega</u>	Fax:	<u>571-434-5502</u>	Name (print)				Email:	<u>michael.ortega@neustar.biz</u>
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Name (print)																																									
	Email:	<u>michael.ortega@neustar.biz</u>																																							

6

Further Action: _____

NPA in jeopardy: Yes: _ No: _

If yes, refer to the Section 9 of the assignment guidelines

Remarks:

According to the FCC 2nd Report and Order (FCC 00-429) effective June 30, 2003, in order to receive additional numbering resources, the MTE form you submit must meet the 75% utilization level. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NOX) Assignment Guidelines for the appeals process.

A copy of this Part 3 has been sent to the following users/email addresses.

REDACTED

**Gainesville
Utilization Summary
Report**

Attachment 2

Exchange	Central Office	Wire Center CLLI	Avg Growth Per Month	Available TNs	MTE
Gainesville	Main	GSVLFLMADS0	[REDACTED]	[REDACTED]	[REDACTED]
Gainesville	Main	GSVLFLMADS1	[REDACTED]	[REDACTED]	[REDACTED]
Gainesville	Northwest	GSVLFLNW33E	[REDACTED]	[REDACTED]	[REDACTED]

Customer Contact Information

[REDACTED]