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COMMISSION  
CLERK

November 18, 2010

100445-TX

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

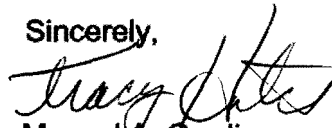
**Re: Petition for the Expedited Review of Growth Code Denial by  
the Number Pooling Administrator for the Boca Raton  
Exchange (FTLDFLOVDS3)**

Dear Ms. Cole:

Enclosed is an original and seven copies of TCG South 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 \_\_\_\_\_  
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CLK Grant

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FPSC-COMMISSION CLERK

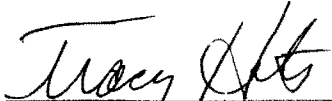
**CERTIFICATE OF SERVICE**  
**Petition for the Expedited Review of Growth**  
**Code Denial by the Number Pooling Administrator**  
**for the Boca Raton Rate Center (FTLDFLOVDS3)**

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

First Class U.S. Mail this 18<sup>th</sup> day of November, 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.  
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[thomas.foley@neustar.com](mailto: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 Number Pooling Administrator )  
For the Boca Raton Rate Center (FTLDFLOVDS3) )

Docket No. 100445-TX  
Filed: November 18, 2010

**PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL**

TCG South Florida ("TCG"), 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 Pooling Administrator's ("NeuStar") denial of TCG's request for additional numbering resources in the Boca Raton rate center. In support of this petition, TCG states:

**PARTIES**

1. TCG is a competitive local exchange carrier ("CLEC") regulated by the Commission and authorized to provide local exchange 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 Industry Numbering Committees (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. The Boca Raton rate center consists of two (2) switching entities that utilize numbering resources: Ft. Lauderdale (FTLDFLOVDS3) and North Miami (NMIAFLAYDS0).

5. On October 28, 2010, TCG requested additional numbering resources from NeuStar for the Boca Raton rate center. Specifically, TCG requested a block to meet the request of a specific customer for 100 consecutive numbers where the format of the NXX is in the NX7 format.

6. At the time of the code request, the Boca Raton rate center had a MTE of 45.19 and a utilization of 49.42%, while the MTE for the Ft. Lauderdale (FTLDFLOVDS3)<sup>1</sup> switch was 44.27.

7. On October 28, 2010, NeuStar denied TCG's request for additional numbering resources because TCG had not met the utilization based criteria, notwithstanding the fact that TCG 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 utilization information and 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 NeuStar's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).

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<sup>1</sup> FTLDFLOVDS3 is the specific switch CLLI. In the documentation the POI (WPBHFLGRXCY) is listed.

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

(a) NeuStar's denial of numbering resources to TCG interferes with TCG's ability to serve its customers within the State of Florida.

(b) As a result of NeuStar's denial of TCG's request for additional numbering resources, TCG will be unable to provide telecommunications services to its customers.

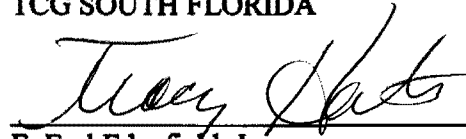
WHEREFORE, TCG requests:

1. The Commission review the decision of NeuStar to deny TCG's request for additional numbering resources for the Boca Raton rate center; and

2. The Commission direct NeuStar to provide the requested numbering resources for the Boca Raton rate center as discussed above.

Respectfully submitted this 18th day of November, 2010.

TCG SOUTH FLORIDA

A handwritten signature in cursive script, appearing to read "Tracy Hatch", is written over a horizontal line.

E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Greg Follensbee

150 South Monroe Street

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