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**REDACTED**

December 10, 2012

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

RECEIVED-FPSC  
12 DEC 10 PM 3:54  
COMMISSION  
CLERK

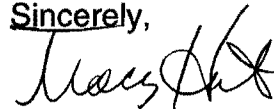
Dear Ms. Cole:

Re: **Docket No.:** 120309-TA  
**Petition for Expedited Review of Growth  
Code Denial by the Number Pooling Administrator  
for the Clearwater Exchange (TAMQFLRYDS0)**

Enclosed is an original and seven copies of TCG of 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,

  
Tracy W. Hatch

cc: All Parties of Record  
Gregory R. Follensbee  
Suzanne L. Montgomery

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL 2  
IDM \_\_\_\_\_  
TEL 5  
CLK \_\_\_\_\_

08058 DEC 10 2012  
FPSC-COMMISSION CLERK

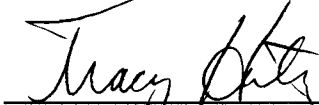
**CERTIFICATE OF SERVICE**  
**Petition for Expedited Review of Growth**  
**Code Denial by the Number Pooling Administrator**  
**for the Clearwater Exchange (TAMQFLRYDS0)**

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

First Class U.S. Mail this 10th day of December, 2012 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

  
\_\_\_\_\_  
Tracy W. Hatch

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth )  
Code Denial by the Number Pooling Administrator )  
For the Clearwater Exchange (TAMQFLRYDS0) )

Docket No.: 120309-TA  
Filed: December 10, 2012

**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-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NeuStar”) denial of TCG’s request for additional numbering resources in the Clearwater rate center. In support of this petition, TCG states:

**PARTIES**

1. TCG is a general partnership organized and formed under the laws of the State of New Jersey.
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.

**BACKGROUND AND REQUEST FOR RELIEF**

4. The Tampa rate center consists of one (1) switching entity that utilize numbering resources: Tampa (TAMQFLRYDS0).
5. On December 5, 2012, TCG requested numbering resources from NeuStar for the Clearwater rate center. Specifically, TCG requested a block of 1,000 consecutive numbers for a specific customer request.

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

6. At the time of the code request, the Clearwater rate center had a MTE of 7.33 and a utilization of 68.029%.

7. On December 5, 2012, 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 customer 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).

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's 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 as required under Florida law.

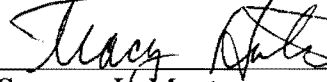
WHEREFORE, TCG requests:

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

2. The Commission directed NeuStar to provide the requested numbering resources for the Clearwater rate center as discussed above.

Respectfully submitted this 10th day of December, 2012.

TCG SOUTH FLORIDA



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Suzanne L. Montgomery

Authorized House Counsel No. 94116

Tracy W. Hatch

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

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Attachment 1

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 727-  
CLEARWATER-  
FL-92489  
Individual Block  
Request

Type of Application: New | Change | Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TCG SOUTH FLORIDA  
Headquarters Address: [REDACTED]  
City, State, Zip: [REDACTED]  
Contact Name: [REDACTED]  
Contact Address: [REDACTED]  
City, State, Zip: [REDACTED]  
Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@att.com

Pooling Administrator:

Contact Name: Dara Flowers  
Contact Address: 1880 Sutter St  
City, State, Zip: Concord, CA 94620  
Phone: 925-383-8738 FAX: 925-363-7697  
E-mail: dara.flowers@comstar.biz

1.2 General Information:

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Part 1A

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Check one: No LRN needed  LRN needed

NPA: 727 LATA: 952 OCN: <sup>iv</sup> 8300 Parent Company's OCN 7125

Number of Thousands-Blocks Requested: 1

Switching Identification(Switch Entity/POI): <sup>v</sup>  
TAMOFLEYDS0

City or Wire Center Name: TAMOFLEYDS0 Rate Center: <sup>vi</sup> CLEARWATER

Rate Center Sub Zone: CLEARWATER

### 1.3 Dates:

Date of Application: <sup>vii</sup> 12/05/2012 Requested Block Effective Date: <sup>viii</sup> 01/05/2013

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.

Request Expedited Treatment? (See Section 8.6) Yes  No

### 1.4 Type of Service Provider Requesting the Thousands-Block :

- Type of Service Provider : CAP OR CLEC (LEC, EXC, CMRS, Other)
- Primary type of service Blocks to be used for : Wireline
- Thousands-Block(s) (NXX-X) assignment Preference (Optional) 727-333-456
- Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any \_\_\_\_\_
- If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) \_\_\_\_\_

### 1.5 Type of Request:

Initial block for rate center : Yes \_\_\_\_\_ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.  
Growth block for rate center : Yes  If Yes , attach months to exhaust worksheet

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

Type of change(Mark all that apply)

OCN:Intra-company  Switching Id Part 1B

OCN:Inter-company  Effective Date

Change block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

### 1.6 Block Return :

- a) Is this block Contaminated Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC Yes \_\_\_\_\_ No \_\_\_\_\_
- d) Has this block been protected from further assignment Yes \_\_\_\_\_ No \_\_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

### Remarks:

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

[Redacted Signature]

Signature of Block Applicant

Sr.  
Specialist  
= 12/05/2012  
Network  
Support  
Title Date

### 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 company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.



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MIE Block

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Appendix 3

May 16, 2008

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

Tracking Number: 727-CLEARWATER-FL-524599

Date: 12/05/2012

OCN: 8300

Company Name: TCG SOUTH FLORIDA

Rate Center: CLEARWATER

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): NPA NXX BLOCK ID 727 373 A  
727 373 0 727 373 1 727 373 2 727 373 3 727 373 4 727 373 5 727 373 7

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: Sr. Specialist - Network Support

Telephone No.: [REDACTED]

FAX No.: [REDACTED]

E-mail: fbryant@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 (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>2</sup>: [REDACTED]

List  
Excluded  
Code(s) or  
Block(s): [REDACTED]

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	

E. Growth History - Previous 6 [REDACTED]

[http://www.nationalpooling.com/pas/search/print\\_form.jsp](http://www.nationalpooling.com/pas/search/print_form.jsp)

12/5/2012

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months<sup>3</sup>

F. Forecast  
- Next 12  
months<sup>4</sup>

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

H. Months  
to Exhaust<sup>5</sup> =  $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1		7.334

I. Utilization<sup>6</sup> =  $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)} \times 100}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}}$   
= 68.029

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

<sup>3</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>4</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</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>6</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

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Part 3

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November 21, 2003  
ATIS-0300066.at3

Attachment 3

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

Tracking Number : 727-  
CLEARWATER-FL-  
804598

Date of Application: 12/05/2012 Effective Date: \_\_\_\_\_  
Date of Receipt: 12/05/2012 Date of Response: 12/06/2012

Service Provider Name: TCG SOUTH FLORIDA  
(Telcordia™ LERG™  
Routing Guide ) OCN: 8300  
Parent Company OCN: 7125

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

Pooling Administrator Contact Information:  
Dara Flowers Phone: 825-363-8730  
Signature of Pooling Administrator  
Dara Flowers Fax: 825-363-7697  
Name (print)  
Email: dara.flowers@neustar.biz

NPA-NOX or NPA-  
NOX-X : \_\_\_\_\_

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

Block Contaminated(Yes or No) : \_\_\_\_\_  
If Yes, enter the number of TNs contaminated : \_\_\_\_\_

Switch Identification(Switch Entry/POI): 1  
Rate Center: TAMQFLRYDS0  
Rate Center Sub Zone: CLEARWATER  
CLEARWATER

Form Complete, request denied.

Explanation:

DR-57: You do not meet the NTE and/or Utilization 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 (NOX-X) Pooling Administration Guidelines for the

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appeals process.

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Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

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Remarks:

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<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<sup>TM</sup> 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.)

7.

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**Clearwater  
Utilization Summary  
Report**

**Attachment 2**

Customer Contact Information

