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July 25, 2014

Carlotta S. Stauffer, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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COMMISSION  
CLERK

**Re: Docket No.:** \_\_\_\_\_  
**Petition for Expedited Review of Growth Code Denials by the  
Number Pooling Administrator for the Orlando exchange (Azalea  
Park)**

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications LLC d/b/a AT&T Florida's Petition for Expedited Review of Growth Code Denial, which we ask that you file in the above 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  
Elise R. McCabe  
Brian W. Moore

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth ) Docket No.  
Code Denials by the Number Pooling Administrator )  
for the Orlando exchange (Azalea Park) ) Filed: July 25, 2014  
\_\_\_\_\_)

**PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL**

BellSouth Telecommunications, LLC 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 Pooling Administrator’s (“NeuStar”) denial of AT&T Florida’s requests for additional numbering resources in the Hollywood 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. 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 Section 364.16(7), Florida Statutes, Order FCC 00-104, and Industry Numbering Committee’s (INC) Number Pooling Guidelines, Sections 3.7 and 12(c). The INC provisions provide

that a carrier may seek review of NeuStar's decision to deny numbering resources before the appropriate state regulatory authority.

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

4. The Orlando exchange consists of six (6) central offices and six (6) switching entities that utilize numbering resources: Azalea Park (ORLDFLAPDS0), Colonial (ORLDFLCLDS0), Magnolia (ORLDFLMADS1), Pinecastle (ORLDFLPCDS0), Pinehills (ORLDFLPHDS0), and Sandlake (ORLDFLSADS0).

5. On July 7, 2014, AT&T Florida requested additional numbering resources from NeuStar for the Azalea Park (ORLDFLAPDS0) switch. See Attachment 1. Specifically, AT&T Florida requested a 1,000 block of numbers to meet the request of a specific customer. Due to the customer's dialing patterns, the customer has requested a block of numbers in the 407-243 NPA-NXX.

6. At the time of the code request, the Orlando exchange had a month-to-exhaust ("MTE") of 298.84 and a utilization of 52.15%, while the MTE for the Azalea Park (ORLDFLAPDS0) switch was 506.58 with a utilization of 70.87%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for each switch in the Hollywood exchange as well as the customers contact information is attached. See Attachment 2.

7. On May 29, 2014, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the MTE or 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.

8. The FCC's Order 00-104 and the INC guidelines provide that state regulatory authorities have the 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 the North American Numbering Plan Administration ("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) looks only at the MTE and utilization rate for the entire rate center and does not consider the needs of a specific customer. 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 NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NeuStar'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 new 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 the

CLECs, which have recently entered the local service market, 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 NeuStar'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 NeuStar to deny AT&T Florida's request for additional numbering resources for the Hollywood exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Hollywood exchange as discussed above.

Respectfully submitted this 25<sup>th</sup> day of July 2014.

BELLSOUTH TELECOMMUNICATIONS, LLC d/b/a AT&T FLORIDA



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Brian Moore  
Tracy Hatch  
c/o Elise R. McCabe  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(850) 425-6360

ATTACHMENT 1

**(REDACTED)**

From: [REDACTED]  
Sent: Monday, July 07, 2014 12:30 PM  
To: [REDACTED]  
Subject: Emailing: Pooling Administration System.htm

Pooling Administration System

• Sign Out

[REDACTED]@att.com (SP)

Time : 07/07/2014 12:29:14 PM EDT

Printable Version

TBPAG Attachment 1 - March 19, 2007

**Thousands-Block Application Form - Part 1A**

Tracking Number: **407-  
ORLANDO-  
FL-738792**  
**Individual  
Block  
Request**

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:  
Company Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL  
TEL & TEL**  
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: **1800 Sutter St**  
City,State,Zip: **Concord ,CA,94520**  
Phone: **925-363-8730** FAX: **925-363-7697**  
E-mail: **dara.flowers@neustar.biz**

1.2 General Information:

Check one : No LRN needed  LRN needed

NPA: 407 LATA: 458 OCN: 9417 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ORLDFLAPDS0

City or Wire Center Name : \_\_\_\_\_

Rate Center:  
ORLANDO

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**

Date of Application: <sup>vii</sup> 07/07/2014

Requested Block Effective Date:  
<sup>vii</sup> 08/07/2014

[ ] 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 :**

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC) (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) \_\_\_\_\_

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_

e) 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

[ ] 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 <sup>ix</sup> [ ] Switching Id [ ] Part 1B

[ ] OCN:Inter-company <sup>x</sup> [ ] 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(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.



Signature of Block Applicant

Sr. 07/07/2014  
Specialist  
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.

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 Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing 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 (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>xi</sup>. 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 well 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. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Foot Notes :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> Operating 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 should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior

assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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

E. Growth History - Previous 6 months<sup>3</sup>

[REDACTED]

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

[REDACTED]

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

H. Months to Exhaust<sup>5</sup>

Numbers Available for Assignment to Customers(A)

=

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

[REDACTED]

Months To Exhaust

298.839

I. Utilization<sup>6</sup>

Assigned Numbers(B) - Excluded Numbers(D)

=

X 100 = 56.37

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>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))

[Back]

**From:** [REDACTED]  
**Sent:** Monday, July 07, 2014 12:30 PM  
**To:** [REDACTED]  
**Subject:** Emailing: Pooling Administration System.htm

## Pooling Administration System

• Sign Out

[REDACTED]@att.com (SP)

Time : 07/07/2014 12:30:05 PM EDT

Printable Version

November 21, 2003  
ATIS-0300066.at3

Attachment 3

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

**Tracking Number :** 407-ORLANDO-  
FL-738792

**Date of Application:** 07/07/2014 **Effective Date:** \_\_\_\_\_

**Date of Receipt:** 07/07/2014 **Date of Response:** 07/07/2014

**Service Provider Name:** BELLSOUTH TELECOMM INC DBA SOUTHERN  
BELL TEL & TEL

(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) **OCN:** 9417

**Parent Company OCN:** 9400

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

#### Pooling Administrator Contact Information:

**Dara Flowers** **Phone:** 925-363-  
8730

**Signature of Pooling  
Administrator**

**Dara Flowers** **Fax:** 925-363-  
7697

**Name (print)**

**Email:** dara.flowers@neustar.biz

**NPA-NXX or  
NPA-NXX-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 Entity/POI): <sup>1</sup> ORLDFLAPDS0

Rate Center: ORLANDO

Rate Center Sub Zone: \_\_\_\_\_

**X Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE 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 (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.)

[Back]



**From:** [REDACTED]  
**Sent:** Monday, July 07, 2014 12:29 PM  
**To:** [REDACTED]  
**Subject:** Emailing: Pooling Administration System.htm

## Pooling Administration System

[REDACTED]att.com (SP)

• [Sign Out](#)

Time : 07/07/2014 12:28:37 PM EDT

Your Utilization calculates to 56.370%. The FCC required the utilization of 75.000%.  
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
- Over-Contaminated Block Exception

[\[Submit\]](#) [\[Cancel\]](#)

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ATTACHMENT 2

**(REDACTED)**

**Orlando  
Utilization Summary  
Report**

**Attachment 2**

<b>Exchange</b>	<b>Central Office</b>	<b>Wire Center CLLI</b>	<b>Blocks</b>	<b>Average Growth</b>	<b>Available TNs</b>	<b>MTE</b>	<b>Util</b>
Orlando	Azalea Park	ORLDFLAPDS0					
Orlando	Colonial	ORLDFLCLDS0					
Orlando	Magnolia	ORLDFLMADS1					
Orlando	Pinecastle	ORLDFLPCDS0					
Orlando	Pinehills	ORLDFLPHDS0					
Orlando	Sandlake	ORLDFLSADS0					

**Customer Contact Information**

