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February 26, 2016

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COMMISSION
CLERK

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

REDACTED

Re: Docket No.: _____
**Petition for Expedited Review of Growth Code Denials by the Number
Pooling Administrator for the Oviedo Exchange)**

Dear Ms. Stauffer:

Enclosed are 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. Thank you.

Sincerely,

Tracy W. Hatch

TWH/mhs
Enclosures

cc: Elise R. Banister

1148589

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CLERK _____

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 Oviedo exchange (Oviedo Main)) Filed: February 26, 2016
_____)

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 Oviedo 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 in this matter pursuant to Section 364.16, Florida Statutes and 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 Oviedo exchange consists of two (2) switching entities that utilize numbering resources: Oviedo Main (OVIDFLCADS0) and Sanford Main (SNFRFLMADS0).

5. On February 17, 2016, AT&T Florida requested additional numbering resources from NeuStar for the Oviedo Main (OVIDFLCADS0) switch. See Attachments 1. Specifically, AT&T Florida requested 3,000 consecutive numbers to meet the request of a specific customer.

6. At the time of the code request, the Oviedo exchange had a MTE of 60.31 and a utilization of 37.23%, while the MTE for the Oviedo Main (OVIDFLCADS0) switch was -233.45 with a utilization of 64.05%.

7. On February 17, 2016, 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. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Jacksonville exchange and the customers 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. 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.

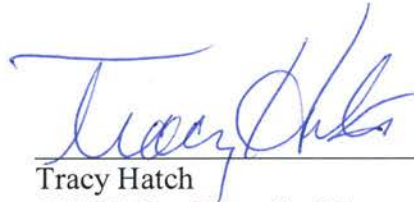
WHEREFORE, AT&T Florida requests:

1. The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the Oviedo exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Oviedo exchange as discussed above.

Respectfully submitted this 26th day of February 2016.

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T

FLORIDA



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Pooling Administration System

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TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking Number: **407-OVIEDO-FL-900708**
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: **500 Broad St SE**

City, State, Zip: **Gainesville, GA, 30501**

Contact Name: [REDACTED]

Contact Address: **500 Broad St SE**

City, State, Zip: **Gainesville, GA, 30501**

Phone: [REDACTED] Fax: [REDACTED]

E-mail: [REDACTED]@att.com

Pooling Administrator: ⁱⁱ

Contact Name: **Dara Flowers**
1800 Sutter St

Contact
 Address:
 City, State, Concord, CA, 94520
 Zip:
 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 ⁱⁱⁱ _____

NPA: 407 LATA: 458 OCN: ^{iv} 9417 Parent
 Company's OCN 9400

Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI) : ^v
OVIDFLCADS0

Rate Center: ^{vi} OVIEDO

1.3 Dates:

Date of Application: ^{vii} <u>02/17/2016</u>	Requested Block Effective Date: ^{viii} <u>03/19/2016</u>
---	---

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 X

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 X 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^{ix} Switching Id Part 1B
- OCN: Inter-company^x Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ or 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 _____ or No _____
- d) Has this block been protected from further assignment: Yes _____ or 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 as of the date of this application.

		<u>02/17/2016</u>
Signature of Block Applicant	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 iconectiv™ 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 iconectiv Telecom 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 CLI™ tandem of the facilities based provider^{xi}. 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. The 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.

Footnotes:

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} 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).

^v 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.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

* Select if you are not the current Block Holder

*i LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

Back

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6

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Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 407-OVIEDO-FL-900708

Date: Wednesday,
February 17, 2016

OCN:9417

Company Name:BELLSOUTH TELECOMM INC DBA
SOUTHERN BELL TEL & TEL

Rate Center: OVIEDO

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:407 359 A 407 365 A 407 366 A
407 327 A 407 971 A 407 977 A

Name of Block Applicant: [redacted]

Signature: [redacted]

Title: [redacted]

Telephone No.: [redacted]

FAX No: [redacted]

E-Mail: [redacted]att.com

A. Available Numbers: [redacted]

B. Assigned Numbers: [redacted]

C. Total Numbering Resource: [redacted]

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

7

List Excluded Code(s) or Block(s):

Month Month Month Month Month Month Month Month Month Month Month Month

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

E. Growth History - Previous 6 months⁴

[Redacted]

F. Forecast - Next 12 months⁵

[Redacted]

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

H. Months to Exhaust⁶ =

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	[Redacted]	[Redacted]
2	[Redacted]	[Redacted]
3	[Redacted]	[Redacted]

I. Utilization⁷ =

Assigned Numbers(B) X 100 = [Redacted]

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation: _____

8

¹A 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.

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

³Quantity 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).

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 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Back

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January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPA G Part 3

Tracking Number : 407-OVIEDO-FL-900708

Date of Application: 02/17/2016 Effective Date: _____

Date of Receipt: 02/17/2016 Date of Response: 02/17/2016

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

(iconectiv™ LERG™ 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

10

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): ¹

OVIDFLCADSO

Rate Center:

OVIEDO

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:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

Back

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12

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January 12, 2015

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 407-OVIEDO-FL-900708

Date of Application: 02/17/2016 Effective Date: _____

Date of Receipt: 02/17/2016 Date of Response: 02/17/2016

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

(iconectiv™ LERG™ 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

13

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): ¹ _____

OVIDFLCADS0

Rate Center: _____

OVIEDO

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:

14

¹ 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

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15

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Time : 02/17/2016 03:07:37 PM EST	
[] att.com (SP)	
	Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)¹
	Your Utilization calculates to 37.233%. The FCC requires a utilization of 75%. You have requested more blocks than you will exhaust in six months.
Select One Option and Submit	
<input checked="" type="radio"/> Return to the Months To Exhaust Form <input type="radio"/> Need to request a State Waiver <input type="radio"/> Received a State Waiver <input type="radio"/> Over-Contaminated Block Exception	
<input type="button" value="Submit"/> <input type="button" value="Cancel"/>	
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16

**Oviedo
Utilization Summary
Report**

Attachment 2

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Oviedo	Main	OVIDFLCADS0	50				
Oviedo	Sanford Main	SNFRFLMADS0	10				
Customer Contact Information							