

NANCY B. WHITE
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

September 24, 2001

RECEIVED: FPSC
01 SEP 24 PM 4:28
COMMISSION
CLERK

Mrs. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**RE: Docket No. 011235-TL
BellSouth's Petition for Expedited Review of Growth Code
Denials by the North American Numbering Plan
Administration (NANPA) for the Miami Exchange**

Dear Mrs. Bayó;

Enclosed is an original and fifteen copies of BellSouth Telecommunications Inc.'s Petition for Expedited Review of Growth Code Denials by the North American Numbering Plan Administration (NANPA) for the Miami Exchange, which we ask that you file in the above captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Nancy B. White
(RA)

Nancy B. White

CC: All Parties of Record
Marshall M. Criser III
Nancy B. White

APP _____
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CMP _____
COM _____
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denials by the North American Numbering)
Administration for the Miami Exchange) Filed: September 24, 2001
_____)

PETITION FOR EXPEDITED REVIEW OF NXX CODE DENIALS

NOW COMES BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to 47 C.F.R. § 52.15(g)(iv) and Federal Communications Commission ("FCC") Order FCC 00-104, petitions the Florida Public Service Commission ("FPSC" or "Commission") to review the North American Plan Administrator's ("NANPA") denials of BellSouth's applications for use of additional numbering resources in the Miami exchange. In support of this petition, BellSouth states:

PARTIES

1. BellSouth 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 the North American Numbering Plan ("NANP"). See 47 C.F.R. § 52.13(a),(b).

JURISDICTION

3. The Commission has jurisdiction of this matter pursuant to 47 C.F.R. § 52.15(g)(iv). This provision provides that a carrier may challenge the NANPA's decision to deny numbering resources to the appropriate state regulatory commission.

BACKGROUND AND REQUEST FOR RELIEF

4. On March 31, 2000, the FCC issued Order No. 00-104 (“FCC 00-104” or the “Order”) in the Numbering Resource Optimization docket (Docket No. 99-200). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of telephone numbers and to avoid further exhaustion of telephone numbers under the NANP.

5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. FCC Order at § 105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing numbering inventory within the applicant’s rate center will be exhausted within six months of the application. Prior to the ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant’s existing number inventory within the applicant’s serving switch to exhaust within a specific months-to-exhaust (“MTE”) of the code application in order for a code to be assigned or for the carrier to prove that it was unable to meet a specific customer’s request with its current inventory of numbers. The FCC stated its reason for the shift to a “rate center” basis for determining the need for new numbering resources was intended to “more accurately reflect how numbering resources are assigned” and to allow “carriers to obtain numbering resources in response to specific customer demands.” FCC Order at ¶ 105.

6. As a result of FCC 00-104, the FCC adopted 47 C.F.R. § 52.15 (g)(iii) and (iv) which provides:

All service providers shall maintain no more than a six-month inventory of telephone numbers in each rate center or service area in which it provides telecommunications service.

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resources application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an Operating Company Number (OCN). The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state regulatory commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.

7. Since the beginning of this year, BellSouth has submitted several applications for additional numbering resources to NANPA and NeuStar, the pooling administrator, for assignment of additional numbering resources to meet the demands of its customers in several Florida exchanges, including Jacksonville, Ft. Lauderdale, Orlando and Miami.
8. BellSouth has completed these applications in accordance with Industry Numbering Committee's (INC's) guidelines and filled out the necessary Months-to-Exhaust Certification Worksheets as required.
9. BellSouth has utilized mechanisms such as number pooling to manage its numbering resources in the most efficient manner. However, as the Commission is well aware, in some circumstances, BellSouth has been required to petition the Commission

for relief. As for this request for additional numbering resources for the Miami exchange, BellSouth states the following:

10. The Miami exchange consists of twenty-four (24) central offices and twenty-eight (28) switching entities that utilize numbering resources: Airport (MIAMFLAGRS0), Alhambra (MIAMFLAEDS0 and MIAMFLAERS0), Allapattah (MIAMFLAL63E), Bayshore (MIAMFLBA85E), Miami Beach (MIAMFLBRDS0), Biscayne (MIAMFLBCDS0), Canal (MIAMFLCADS0), Dadeland Blvd (MIAMFLDBRS1), Flagler (MIAMFLFLDS0), Grande (MIAMFLGRDS0 and MIAMFLGRDS1), Hialeah (MIAMFLHLDS0), Indian Creek (MIAMFLICDS0), Key Biscayne (MIAMFLKEDS0), Metro (MIAMFLMERS0 and MIAMFLME32E), Miami Shores (MIAMFLSH75E), North Miami (MIAMFLNMDS0), Northside (MIAMFLNSDS0), Opa Locka (MIAMFLLOL68E), Palmetto (MIAMFLPLDS0 and MIAMFLPLRS0), Poinciana (MIAMFLPB88E), Red Road (MIAMFLRRDS0), Silver Oaks (MIAMFLSODS0), West Dade (MIAMFLWDDS0), and West Miami (MIAMFLWMDS0).

11. On July 24, 2001 and September 10, 2001, BellSouth made two (2) requests for numbering resources for the Poinciana and Palmetto switches, respectively, to allow BellSouth to meet the numbering demands of its customers in these switches. *See* Attachment 1. Specifically, the requests for the Poinciana (MIAMFLPB88E) and Palmetto (MIAMFLPLDS0) were for general growth numbering resources needed to retain a six (6) month inventory of telephone numbers. In addition to the switches being less than 6 MTE, BellSouth currently has a customer that needs numbers in the Poinciana and Palmetto offices. BellSouth is unable to meet this customer's demands based on its

current inventory. BellSouth will lose this customer if numbers are not made available by the end of October 2001.

12. At the time of the code request, the Miami exchange had a MTE of 10.9 and 14.21 and a utilization of over 76%, while the MTE for the Poinciana (MIAMFLPB88E) switch was 4.41 and the MTE for the Palmetto (MIAMFLPLDS0) was 4.33.

13. On August 1, 2001 and September 21, 2001, NANPA denied BellSouth's two (2) code requests for the Miami exchange. *See* Attachment 2. The basis for NANPA's denial was that BellSouth had not met the rate center based MTE criteria for each switch now set forth in the Central Office Code Guidelines Section 4.2.1, notwithstanding the fact that BellSouth does not have the numbering resources needed to satisfy customer demand in these switches.

14. BellSouth's requested numbering resources would not materially impact exhaustion of available numbers in the 786 area code.

15. As discussed above, both the FCC Order and NANPA's Central Office Code Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. *See* 47 C.F.R. § 52.15(g)(3)(iv); § 13.0 of the NANPA Central Office Code (NXX) Guidelines.

16. 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, NANPA looks at the number of MTE for the entire rate center without any exceptions. 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.

17. Unfortunately, BellSouth's inability to obtain numbering resources in the above switches, which is necessary to meet its customers numbering demands in multi-switch rate centers, will not be the last time BellSouth experiences this problem. BellSouth has a total of 101 rate centers in Florida with 30 of these being multi-switch rate centers. Some of the switches within these multi-switch rate centers are already within or near the six MTE. BellSouth, however, believes that it will be unable to meet the six MTE threshold at the rate center level in all of these multi-switch rate centers, causing serious problems with fulfilling its carrier of last resort obligations.

18. BellSouth requests that the Commission's reverse NANPA's decision to withhold numbering resources from BellSouth on the following grounds:

(a) NANPA's denial of numbering resources to BellSouth interferes with BellSouth'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. BellSouth 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 ALECs, 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.

(d) As a result of NANPA's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

1. The Commission review the decision of the NANPA to deny BellSouth's request for additional numbering resources; and
2. The Commission direct NANPA to provide the requested codes for the Miami exchange discussed above prior to the end of October 2001.

Respectfully submitted this 24th day of September, 2001

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White
(KA)

Nancy B. White
James Meza III
150 West Flagler Street
Suite 1910
Miami, Florida 33130
(305) 347-5558

R. Douglas Lackey
(KA)

R. Douglas Lackey
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0747

Central Office Code (NXX) Assignment Request - Part 1
Revised September 11, 2000

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: BellSouth Telecommunications, Inc
Headquarters Address: Room 22P69 - BSC / 675 West Peachtree Street, N.E.
City, State, Zip: Atlanta, Georgia 30375
Contact Name: Rena Wilkie
Contact Address: (same as above)
City, State, Zip: (same as above)
Phone: 404-927-4917 FAX: 404-524-2918 E-Mail: rena.wilkie@bridge.bellsouth.com
Code Administrator:²

Name: Terah Adger
Address: Suite 570 / 1800 Sutter Street
City, State, Zip: Concord, California 94520-2561
Phone: 925-363-8705 FAX: 925-363-8714

1.2 NPA: 305/786 LATA: 46017 OCN: 9417 Parent Company's OCN(s) 9400

Switching Identification (Switching Entity/POI)⁴ MIAMFLPB88E

Locality/City/Wire Center: MIAMI Rate Center:⁵ MIAMI

Homing Tandem Operating Co.: BST Tandem Homing CLLI™: NDAOFLGG0IT

1.3 Dates: Date of Application: 7/24/01 Requested Effective Date:^{8,9} ASAP

1.4 Type of company/entity requesting the code:

- a) LEC (LEC, IC, CMRS, Other)
- b) b) Type of service POTS (e.g., Cellular - Type 2)
- c) Code Assignment Preference (Optional)
- d) Codes that are undesirable, if any 666, 800, 900
- e) Type of change: _____

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.

Pool Indicator _____ (YES)¹⁰

1.6 NPA Jeopardy Criteria Apply: Yes _____ No X

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached XXX for RDBS & BRIDS^{11,12}

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 the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application¹³:

Rena Wilkie BellSouth NXX Code Administrator 7/24/01
Signature of Code Applicant¹⁴ Title Date

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

Date: 7/24/01 Company Name: Bellsouth
Rate Center: MIAMI
NPA(s)-NXXs included in growth calculation: See Attached

Signature of Authorized Representative of Code Applicant: Rena Wilkie
Title: Code Administrator Telephone No.: (404) 927-4917 FAX No.: (404) 524-2918

A. Telephone Numbers (TNs) Available for Assignment (See Glossary): 257,756

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
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B. Previous 6-month growth history: 13,801 15,369 17,502 15,963 19,986 11,638

C. Forecast - Next months 1-12: 21,850 22,505 23,180 23,876 24,592 25,330 26,089 26,872 27,678 28,508 29,363 30,244

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): 23,555

E. Months to Exhaust⁶ = $\frac{\text{Telephone Numbers (TNs) Available for Assignment (A)}}{\text{Average Monthly Forecast (D)}}$ = 10.9

F. Utilization Level⁷ = $\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's Inventory}} \times 100$ = 76.3 %

code for growth MIAMFLPB88E

planation: _____ Ex

- 1 A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.
- 2 Report on all resources for the requested geographic area, including newly acquired codes.
- 3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.
- 4 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.
- 5 Forecast of TNs needed in each following month, starting with the most recent month as Month #1. In a jeopardy situation, only 6 months growth projection is required.
- 6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (ii)).
- 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (i)).

Central Office Code (NXX) Assignment Request - Part 1

Revised August 6, 2001

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: BellSouth Telecommunications, Inc

Headquarters Address: Room 22P69- BSC/675 West Peachtree Street, N.E.

City, State, Zip: Atlanta, Georgia, 30375

Contact Name: Rena Wilkie

Contact Address: same as above

City, State, Zip: same as above

Phone: 404 927-4917 FAX: 404 524-2918 E-Mail: rena.wilkie@bridge.bellsouth.com

Code Administrator:²

Name: Terah Adger

Address: Suite 570/1800 Sutter Street

City, State, Zip: Concord, California 94520-2561

Phone: 925 363-8705 FAX: 925 363-8714

1.2 NPA: 305/786 NXX:³ _____ LATA: 46017 OCN:⁴ 9417 Parent Company's OCN(s) 9400

Switching Identification (Switching Entity/POI)⁵ MIAMFLPLDSD

Locality/City/Wire Center: MIAMI Rate Center:⁶ MIAMI

Homing Tandem Operating Co.⁷: BST Tandem Homing CLLI™:⁸ NDAOFLGG0IT

1.3 Dates: Date of Application: 9/10/01 Requested Effective Date:^{9,10} ASAP

1.4 Type of company/entity requesting the code:

a) LEC (LEC, IC, CMRS, Other)

b) Type of service POTS (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any 666, 800, 900

e) Type of change: _____

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.

Pool Indicator _____ (YES)¹¹

1.6 NPA Jeopardy Criteria Apply: Yes _____ No X

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached XXX for RDBS & BRIDS^{12, 13}

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 the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atisc/clc/inc/lncdocs.htm>) as of the date of this application¹⁴:

Rena Wilkie
Signature of Code Applicant¹⁵

Bellsouth NXX Code Administrator
Title

9/10/01
Date

CO CODE ASSIGNMENT

MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Requests for Additional Codes for Growth)

Date: 9/10/01 Company Name: BellSouth

Rate Center: MIAMI

NPA(s)-NXXs included in growth calculation²: See ATTACHED

Signature of Authorized Representative of Code Applicant: Rena Wiekie
Title: Code Administrator Telephone No.: (404) 927-4917 FAX No.: (404) 524-2918

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 243, 345

	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	<u>15,475</u>	<u>15,647</u>	<u>16,684</u>	<u>9,062</u>	<u>11,210</u>	<u>7,086</u>						

C. Forecast - Next months 1-12⁵ 15,891 16,367 16,858 17,363 17,883 18,419 18,971 19,540 20,126 20,729 21,350 21,990

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): 17,130

E. Months to Exhaust⁶ = $\frac{\text{Telephone Numbers (TNs) Available for Assignment (A)}}{\text{Average Monthly Forecast (D)}}$ = 14.21

F. Utilization Level⁷ = $\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's Inventory}} \times 100$ = 92 %

Explanation: Code for MIAMI FL PLDSO

1 A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.
 2 Report on all resources for the requested geographic area, including newly acquired codes.
 3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.
 4 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
 5 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
 6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).
 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

P. 0
170 345-1231
BELL SOUTH
SEP 24 2001 3:08PM

Central Office Code (NXX) Assignment Request - Part 3

Effective May 18, 1998

Code Request Tracking Number: 706-121044

FL - DENIAL

Administrator's Response/Confirmation

Date of Application: July 24, 2001

Date of Receipt: July 24, 2001

Date of Response: August 1, 2001

Effective Date: _____

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

Code Administrator Contact Information:

Terah Adger
Signature of Code Administrator

Phone: 9253638705

Terah Adger
Name (print)

Fax: 9253638714

x NPA: 786

Code Assigned: _____ Date of NXX Code Assignment: _____

a. Switch Identification (Switching Entity/POI): MIAMFLPB88E Rate Center: MIAMI

b. The Code Administrator is _____, is not X responsible for inputting Part 2 information into RDBS and BRIDS.

c. Routing and Rating information complete: Yes _____ No X
Additional RDBS and BRIDS information necessary as follows:
No

d. To be published in the LERG and TMP by _____
Additional RDBS and BRIDS information needs to be received by the code administrator no later than _____

Code Reserved: _____

Date of Reservation: _____

Your code will be honored until _____

Switch Identification (Switching Entity / POI): _____

Form incomplete

Additional information required in the following section(s):

Months to exhaust exceeds 6.0 months (10.9 ON MTE)

x Form complete, code request denied

Explanation: _____

Assignment activity suspended by the administrator

Explanation: _____

Further Action: _____

x NPA in jeopardy: Yes _____ No X

If yes, refer to Section 7 of the assignment guidelines.

Change/Disconnect List: _____

Remarks:

OCN 9417. According to the Central Office Code Assignment Guidelines, Section 4.2.1, code holders requesting growth codes must demonstrate that existing codes within the rate center will exhaust within 6.0 months. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.

Central Office Code (NXX) Assignment Request - Part 3

Effective May 18, 1998

Code Request Tracking Number: 786-127288

Administrator's Response/Confirmation

Date of Application: September 10, 2001 Date of Receipt: September 11, 2001

Date of Response: September 21, 2001 Effective Date: _____

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

Code Administrator Contact Information:

Terah Adger Phone: 9253638705
Signature of Code Administrator

Terah Adger Fax: 9253638714
Name (print)

NPA: 786 Code Assigned: _____ Date of NXX Code Assignment: _____

- a. Switch Identification (Switching Entry/POI): MIAMFLPLDS0 Rate Center: MIAMI
- b. The Code Administrator is _____, is not responsible for inputting Part 2 information into RDBS and BRIDS.
- c. Routing and Rating information complete: Yes _____ No
Additional RDBS and BRIDS information necessary as follows:
No
- d. To be published in the LERG and TMP by _____
Additional RDBS and BRIDS information needs to be received by the code administrator no later than _____

Code Reserved: _____ Date of Reservation: _____

Your code will be honored until _____
Switch Identification (Switching Entity / POI): _____

Form Incomplete
Additional information required in the following section(s):

SEE REMARKS.

Form complete, code request denied

Explanation: _____
Assignment activity suspended by the administrator
Explanation: _____
Further Action: _____

NPA in jeopardy: Yes _____ No
If yes, refer to Section 7 of the assignment guidelines.

Change/Disconnect List: _____

Remarks:

OCN 9417. According to the Central Office Code Assignment Guidelines, Section 4.2.1, code holders requesting growth codes must demonstrate that existing codes within the rate center will exhaust within 6.0 months. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.