

Michelle A. Robinson  
Assistant Vice President  
Regulatory Affairs Florida



**REDACTED**

One Tampa City Center  
Post Office Box 110, FLTC0616  
Tampa, Florida 33601-0110

Phone 813 483-2526  
Fax 813 223-4888  
michelle.robinson@verizon.com

July 9, 2002

Mr. Bob Casey  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Request for Numbers

Dear Mr. Casey:

Verizon Florida Inc. (Verizon) requests the Florida Public Service Commission to direct the North American Numbering Plan Administrator (NANPA) and the Pooling Administrator (PA) to provide Verizon with numbers in a number block for Florida.

a Verizon customer, has requested a new prefix of sequential telephone numbers to support their

Verizon

has informed and an

Having a single prefix will allow a continuous sequence of numbers enabling a unified numbering plan within their PBX.

On or about June 26, 2002, Verizon submitted a Central Office Code (NXX) Assignment Request to the PA/NANPA for the assignment of an NXX resource necessary to meet the request. A copy of this application is attached as Attachment A. Verizon completed the application in accordance with the PA/NANPA's Central Office Code (NXX) Assignment Guidelines and filled out the necessary Months to Exhaust Certification which is attached as Attachment B.

Verizon submitted the request for a new central office (NXX) code because Verizon does not have sequential numbers available within the central office to meet needs. Although the office is in the

satisfy the request.

DOCUMENT NUMBER-DATE

07470 JUL 18 8

FPSC-COMMISSION CLERK

Mr. Bob Casey  
July 9, 2002  
Page 2

On or about June 27, 2002, the PA/NANPA's Central Office Code Administrator via the Pooling Administration System (PAS) denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that Verizon does not have the numbering resources needed to satisfy its customer's demand in the switch at issue. This decision, provided by the PAS system, is attached as Attachment C.

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, the PA/NANPA looks at the number of months to exhaust for the entire rate center without any exceptions. However, the FCC's December 12, 2001 Order in its Number Resource Optimization Report and Order, CC Docket No. 99-200, FCC No. 01-362, paragraph 64 states that a carrier "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Also, paragraph 64 states "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." The Florida Commission thus has the authority to review the PA/NANPA decisions and reverse them when appropriate.

Verizon seeks the Commission's review of the PA/NANPA's decision to withhold numbering resources. The CO Code Administration decision violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need, and the PA/NANPA's denial of numbering resources interferes with Verizon's ability to serve its customers.

Verizon requests that the Commission instruct the PA/NANPA to release the numbering resources necessary to meet the needs of \_\_\_\_\_ Please do not  
hesitate to call me if you have any questions.

Sincerely,



Michelle A. Robinson  
Assistant Vice President  
Regulatory Affairs Florida

MAR:lh  
Attachments

**REDACTED**

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

Type of Application:  New  Change  Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: VERIZON  
Headquarters Address: 600 HIDDEN RIDGE DR  
City, State, Zip: IRVING, TX 75038  
Contact Name: MARGE THOMPSON  
Contact Address: 2094 MCGEE LANE  
City, State, Zip: LEWISVILLE, TX 75077  
Phone: 972-318-5335 FAX: 972-317-2161 E-Mail: MARGE.THOMPSON@VERIZON.COM  
Code Administrator:  
Name: TERAH ADGER  
Address: 1800 SUTTER STREET SUITE 570  
City, State, Zip: CONCORD, CA 94520  
Phone: 925-363-8705 FAX: 925-363-8714

1.2 NPA: 813 LATA: 952 OCN:<sup>3</sup> 0328 Parent Company's OCN(s) -NONE  
Switching Identification (Switching Entity/POI)<sup>4</sup> \_\_\_\_\_  
Locality/City/Wire Center: \_\_\_\_\_ Rate Center:<sup>5</sup> \_\_\_\_\_  
Homing Tandem Operating Co.: VERIZON FLORIDA INC. Tandem Homing CLLI™:<sup>7</sup> TAMPFLXA02T

1.3 Dates: Date of Application: 06/26/2002 Requested Effective Date:<sup>8,9</sup> 08/31/2002

1.4 Type of company/entity requesting the code:  
a) LEC (LEC, IC, CMRS, Other)  
b) Type of service EOC / POTS (e.g., Cellular - Type 2)  
c) Code Assignment Preference (Optional) - \_\_\_\_\_  
d) Codes that are undesirable, if any \_\_\_\_\_  
e) Type of change: \_\_\_\_\_

1.5 Type of Request (Initial, growth, etc.): Customer requires an

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)<sup>10</sup>

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 X for RDBS & BRIDS<sup>11 12</sup>

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 application<sup>13</sup>.

Alice Jackson SPECIALIST - SERV INV 06/26/2002  
Signature of Code Applicant<sup>14</sup> Title Date

REDACTED

Attachment B

**CO CODE ASSIGNMENT  
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level<sup>1</sup>**  
(Worksheet to be used for Requests for Additional Codes for Growth)

Date: 06/26/02 Company Name: VERIZON

Rate Center: \_\_\_\_\_

NPA(s)-NXXs included in growth calculation<sup>2</sup>: \_\_\_\_\_

Signature of Authorized Representative of Code Applicant: \_\_\_\_\_

Title: SPECIALIST - SERV INV Telephone No.: 972-318-5335 FAX No.: 972-317-2161

A. Telephone Numbers (TNs) Available for Assignment (See Glossary<sup>3</sup>): 10724

	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 <sup>4</sup>	<u>2611</u>	<u>70</u>	<u>963</u>	<u>-5883</u>	<u>4861</u>	<u>-3</u>							
C. Forecast - Next months 1-12 <sup>5</sup>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	<u>364</u>	
D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6):	<u>364</u>												
E. Months to Exhaust <sup>6</sup> =	<u>Telephone Numbers (TNs) Available for Assignment (A)</u>						=	<u>29</u>					
	Average Monthly Forecast (D)												
F. Utilization Level <sup>7</sup> =	<u>Telephone Numbers (TNs) Assigned</u>						X 100 =	<u>82%</u>					
	Total Numbering Resources in Applicant's Inventory												

Explanation:

---



---



---

- 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) (iii)).
- 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

**REDACTED**

Jul-02-02 12:25P



**Marge D. Thompson**  
07/01/02 03:31 PM

To: Alice M. Jackson/EMPL/TX/Verizon@VZNotes  
CC:  
Subject: Part 3 Ready

Thanks,  
Marge Thompson  
Specialist-Network Engineering  
TNAC  
972-318-5335  
marge.thompson@verizon.com

----- Forwarded by Marge D. Thompson/EMPL/TX/Verizon on 07/01/02 03:30 PM -----



**gary.zahn@neustar.biz**  
07/01/02 03:24 PM  
Please respond to  
poolingsupport

To: Marge D. Thompson/EMPL/TX/Verizon@VZNotes  
CC:  
Subject: Part 3 Ready

## Pooling Administration System

Dated 01 July 2002

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

Tracking Number 813-

Date of Application 06/27/2002      Block Effective Date

Date of Receipt 06/27/2002      Date of Response 07/01/2002

Service Provider Name Verizon

(Telcordia™ LERG™ Routing Guide) OCN 0328-VERIZON FLORIDA INC.  
NPAC SOA SPID

#### Pooling Administrator Contact Information :

Name Gary Zahn

Phone 9253638753

Fax 9253637688

E-Mail gary.zahn@neustar.biz

Response

NPA-NXX-X 0-0-0

Block Assigned

**REDACTED**

Block Disconnected

Block Contaminated (Yes or No) null  
Block Allocation Date  
Switch Identification (Switching Entity / POI) null  
Rate Center  
Rate Center Sub Zone null

**Form Complete, block requested denied**

Explanation :

**Assignment activity suspended by the administrator**

Explanation :

This request is being suspended pending receipt of state waiver from FLPSC.

Further Action :

Pooling Administrator  
Gary Zahn  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: 9253638753  
Fax: 9253637688

**REDACTED**

## Pooling Administration System

 [marge.thompson@verizon.com](mailto:marge.thompson@verizon.com)

[Sign Out](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

#### Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

