Michelle A. Robinson Assistant Vice President Regulatory Affairs Florida



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

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August 13, 2002

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

Re: _____ Request for Numbers

020899-TP

Dear Mr. Casey:

In accordance with the expedited process established in order PSC-01-1973-PCO-TL (Docket No. 010782-TL), Verizon Florida Inc. (Verizon) requests the Florida Public Service Commission to direct the Pooling Administrator (PA) to provide Verizon with an uncontaminated _____ number block to satisfy the request of ______ in Tampa, Florida.

Verizon considers the highlighted information in this letter and attachments to be confidential because it contains the customer's name, the customer's planned use of the requested numbers, and the name of Verizon's wire center from which the customer will be served. Verizon is obligated to protect the identity of the customer, and competitors could use this information to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the highlighted information must be kept confidential until returned to Verizon. To assist the Commission in processing this request, the name of the customer who initiated the request is ______

_____. She may be reached at _____

, a Verizon customer, has requested	telephone numbers for
their national headquarters building in the specific range of	This
specific range of numbers is needed to support	

Verizon for their Tampa corporate call centers.

On or about August 5, 2002, Verizon submitted a Thousands Block Application Form Part 1A to the PA for the assignment of a _____ thousands block necessary to meet the _____ request. A copy of this application is attached as Attachment A. YeriperCNI NUMBER OF T

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Mr. Bob Casey August 13, 2002 Page 2

completed the application in accordance with the Thousands - Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust Certification, which is attached as Attachment B.

On or about August 8, 2002, the PA, 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 Thousands – Block Number (NXX-X) Pooling Administration 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 looks at the number of months to exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket 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 indicates that "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's decisions and reverse them when appropriate.

Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's 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's denial of numbering resources interferes with Verizon's ability to serve this customer.

Verizon requests that the Commission instruct the PA 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:Ihr Attachments

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Thousands-Block Application Form Part 1A

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Attachment 1

Attachment A Page 1 of 3

			Tage 1010
Type of Application: (Check one)	X New	Change ¹	Delete
	PLICATION INF		
1.1 Contact information:			
Block Applicant:			
Company Name: GTE (DBA VERIZON)			
Contact Name: ALICE JACKSON			
Address:2094 MCGEE LANE			
City, State, Zip: LEWISVILLE, TX 75077		<u> </u>	+
Phone: <u>972-318-5334</u> Fax: <u>972-31</u> E-Mail: <u>ALICE.JACKSON@VERIZON.COM</u>	17-2161	······································	
			<u> </u>
Pooling Administrator ² :			
Contact Name: GARY ZAHN Address: 1800 SUTTER STREET SUITE 570	0		
City, State, Zip; CONCOHD, CA 94520			
Phone: <u>925-363-8753</u> Fax: <u>925-</u> E-Mail: <u>GARY.ZAHN@NEUSTAR.COM</u>	303-7688		
E-Mail, GART.ZARIV@NE0STAR.COM			
1.2 General information			
1.2A Required when a thousands-block is This section applies if the applicant is request applicant the LERG Assignee. The LERG As Thousands-Block (NXX-X) Number Pooling A NPA:LATA:OCN ³ :AOCN Number of Thousands-Blocks Requested: Switch Identification (Switching Entity/POI) ⁴ : Rate Center ⁵ : Rate Center Homing Tandem Operating Company ⁶ : Route same as NPA NXX-X U 1.2B Required when no LRN is needed NPA: <u>813</u> LATA: <u>952</u> OCN: <u>0328</u> AOCN: <u>0</u> Number of Thousands-Blocks Requestec Rate Center: <u>TAMPAEST</u>	ting a thousands ssignee responsi Administration Gr Numb City or W r Sub Zone: Tanden se Same Rate C 0772 Number of F	-block for an LRN which bilities are listed in Sect uidelines (INC 99-0127 er of Full NXXs Reques fire Center Name: h Homing CLLI ^{TM7} : Center as NPA N	ion 4.2 of the -023). sted:
Switch Identification (switching Entity/POI)8:	1 <u>1</u>		
 1.3 Dates Date of Application[®]: <u>08/05/2002</u> Requested Request Expedited Treatment? (See Section 1.4 Type of Service Provider Requesting a) Type of Service Provider: <u>LEC</u> b) Type of service: <u>EOC / POTS</u> c) Is certification or authorization require If No, explain:	n 9.6) Yes the Thousands (LE0	-Block: C, IXC, CMRS, Other)	
d) Does your company have certification	? Yes X	No	

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09/02 08:58	FAX 206513{	8884	Family Heal	th		Ø03
Tracking Nurn	ber:			_	Attachment 1	
		Thousands	Block Applicatio Part 1A	n Form	Attachment A Page 2 of 3	
i) If ye ii) If no	s, what type? , explain:		_ (regulatory authoriz	ation, license, tarif	f, etc)	
-			nent preference (option undesirable for this a for existing switch, gi			
	Reason For C	hange:				
	ands-Block re	quest is for a n	new application for an	existing switch, pl	ease explain: ¹¹	
1.8 Do NPA Jeop			5 No <u>X</u>			
	nat this applic	ation has been	questing an NXX-X b a prepared in accorda 27-023			
		SPECIALIS	ST - SERV INV		08/05/2002	

	SPECIALIST - SERV_INV	08/05/2002
Signature of Block Applicant	Title	Date

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Tracking Number:_

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Thousands-Block Application Form

Part 1A

Attachment 1

Attachment A Page 3 of 3

⁴ 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 switch /POI.

⁵ Rate Center name must be a tariffed Rate Center.

⁶ Applies to Type 2A wireless, competitive local exchange carriers, or any Block Holder connecting to a Public Switched Telephone Network (PSTN) interconnecting carrier.

⁷ CLLITM code of PSTN interconnecting carrier switch/POI.

⁶ 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 switch /POI.

⁹ 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.

¹⁰ When the applicant is ready to place the thousands-block in service, they should complete a new request form. ¹¹ If eligibility is based on a category that requires additional explanation or documentation and the Pooling

Administrator denies a request, the applicant has the option to pursue an appeals process. Any additional information that can be provided by the applicant may facilitate the processing of the application.

¹ Identify type of and reason for change(s) in Section 1.6.

² The Pooling Administrator is available to assist in completing these forms.

³ 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 (973-884-8249) 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 Telcordia Technologies Traffic Routing Administration (TRA)(732-699-6700).

CO CODE ASSIGNMENT MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹

(Worksheet to be used for Requests for Additional Codes for Growth)

Dal	le: <u>08/05/02</u> Company	Name: <u>V</u>	ERIZON_					. <u> </u>				-	
Rat	e Center: TAMPAEST												
NP	A(s)-NXXs included in growth calcu	lation ² :											
Sig	nature of Authorized Representativ	e of Code	Applicant:										
Title	e: SPECIALIST - SERV INV				Те	lephone N	No.: <u>972-3</u>	18-5334	FAX No.:	<u>972-317-</u>	<u>2161</u>		
A.	Telephone Numbers (TNs) Availa	ble for Ass	ignment (S	See Gloss	ary ³): <u>796</u>	<u> 55</u>							
		Monih #1	Month	Month #3	Month #4	Month ∦5	Month #6	Month #7	Month #8	Monih #9	Month #10	Month #11	Monih #12
B .	Previous 6-month growth history ⁴	<u>370</u>	<u>-1143</u>	<u>4199</u>	<u>1028</u>	<u>-762</u>	<u>1061</u>						
C.	Forecast - Next months 1-125	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>	<u>722</u>
D.	Average Monthly Forecast (Sum	of months	-6 Part C	above div	ided by 6)	: <u>722</u>							
Ε.	Months to Exhaust ⁶ =	Telepho	ne Numbe	rs (TNs)	Available (or Assign	<u>ment (A)</u>	=	11				
			Avera	age Month	ily Foreca	st (D)							
F.	Utilization Level ⁷ =		Telephor	ne Numbe	ers (TNs) /	Assigned		X 100	= <u>87</u> %	6			
		Total	Numbering	, Resourc	es in Appl	icant's Inv	rentory						
Exp	lanalion:									······		,	

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t 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 Glossery 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)).

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Attachment C

	Page 1 of 1
Pooling Administration System	
alice.jackson@verizon.com (SP)	Sign Out
Months to Exhaust and Utilization Certification Worksheet - TN Level (Cor	
You have requested more blocks than you will exhaust in six months.	
Select One Option and Submit	
Return to the Months To Exhaust Form	
O Discard all the information provided for the request and start with a fres	h Part 1A
C State Waiver Option	
in the second	
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