

ORIGINAL

Legal Department

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

September 9, 2002

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

RECEIVED-FPSC  
02 SEP -9 PM 4:33  
COMMISSION  
CLERK

Re: **Docket No.:** 020966-TL  
**Petition for Expedited Review of Growth Code Denials by the  
Number Pooling Administrator for the DeLand exchange  
(DeLand3)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth  
Telecommunications, Inc.'s Petition for Expedited Review of NXX-X Code Denial,  
which we ask that you file in the new captioned matter.

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,

*James Meza III*  
James Meza III  
(2d)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

RECEIVED & FILED

*RLM*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09557 SEP-9 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Petition for Expedited Review of Growth**  
**Code Denials by the Number Pooling Administrator**  
**for the DeLand exchange (DeLand3)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 9th day of September, 2002 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

NANPA  
Thomas Foley  
NPA Relief Planner  
820 Riverbend Blvd.  
Longwood, Florida 32779-2327

  
\_\_\_\_\_  
James Meza III (al)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth )  
Code Denials by the Number Pooling Administrator )  
for the DeLand exchange (DeLand3) )  
\_\_\_\_\_ )

Docket No. 020966-TP

Filed: September 9, 2002

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

BellSouth Telecommunications, Inc. ("BellSouth"), 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 BellSouth's request for additional numbering resources in the DeLand 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. 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 Industry Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

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. 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 North American Numbering Plan Administrator ("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 that 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. On December 29, 2000, the FCC also released FCC 00-429, which reaffirmed FCC 00-104 and also required carriers to also meet a 60 percent initial utilization threshold. FCC 00-429 at ¶ 26. Based on these two FCC orders, carriers are required to meet a six MTE criteria as well as a utilization threshold on a rate center/exchange basis in order to be granted additional numbering resources. Id. at ¶ 29.

7. In FCC 00-104, the FCC directed the industry and the Pooling Administrator to comply with the INC Pooling Guidelines. FCC 11-104 ¶183. Pursuant to the INC Guidelines, in order to obtain thousand-block allocations, the carrier must demonstrate that its existing numbering resources for the rate center will exhaust within six (6) months and also have a utilization of 60 percent for the specific rate center. See INC Guidelines Section 4.3(d) and Appendix 3. These requirements are known as the six (6) months-to-exhaust (“MTE”) and utilization threshold.

8. Since the beginning of this year, BellSouth has submitted several requests for additional numbering resources to North American Numbering Plan Administrator (“NANPA”) and NeuStar for assignment of additional numbering resources to meet the demands of its customers in several Florida exchanges, including Daytona Beach, DeLand, Ft. Lauderdale, Jacksonville, Miami, North Dade, Orlando, and West Palm Beach.

9. BellSouth has completed these applications in accordance with INC guidelines and filled out the necessary Months-to-Exhaust and Utilization Certification Worksheets as required.

10. 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.

11. On May 25, 2001, BellSouth petitioned the Commission to develop an expedited process to review NANPA's denial of a request for additional numbering resources to minimize the delay carrier's experience in attempting to challenge a denial by NANPA. As a result of the BellSouth's Petition and the Commission's efforts to make numbering resources available to carriers, the Commission issued Order No. PSC-01-1873-PCO-TL setting forth an expedited code denial process for non-pooling areas. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

12. The DeLand exchange consists of one central office and one switching entity that utilizes numbering resources: DeLand (DELDFLMADS0).

13. On August 27, 2002, BellSouth requested additional numbering resources from NeuStar for the DeLand switch. See Attachment 1. Specifically, BellSouth requested two 1,000 consecutive number blocks in order to provide 200 numbers from the 7700 – 8699 range which is the only range of numbers that will meet the customers dialing patterns. Since the customer only needs 200 within the range identified above, BellSouth only request the Commission to require NeuStar to provide a single 1,000 block in the format of NXX-8.

14. At the time of the code request, the DeLand exchange had a MTE of 12.48 and a utilization of 84.97%.

15. On August 27, 2002, NeuStar denied BellSouth's request for additional numbering resources because BellSouth had not met the rate center based MTE criteria,

notwithstanding the fact that BellSouth is unable to provide the numbering resources requested by the specific customer. See Attachment 2. Attached to this Petition is the customer contact information. See Attachment 3.

16. 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).

17. 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.

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

(a) NeuStar'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.

(c) As a result of NeuStar'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.

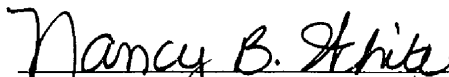
WHEREFORE, BellSouth requests:

1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the DeLand exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the DeLand exchange as discussed above.



Respectfully submitted this 9th day of September, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



Nancy B. White

(22)

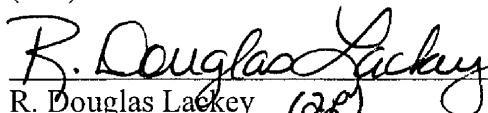
James Meza III

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558



R. Douglas Laekey

(22)

675 West Peachtree Street, Suite 4300

Atlanta, Georgia

(404) 335-0747

461472

# Pooling Administration System

Home (SP)

Sign Out

## Part 1A

Type of Application : New  
Tracking Number : 386-DELAND-FL-100363

### 1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile

#### Block Applicant :

Company Name  
Headquarters Address 675 West Peachtree St. NE  
City Atlanta  
State GA  
Zip 30357

Contact Name [REDACTED]  
Contact Address [REDACTED]  
City [REDACTED] State [REDACTED]  
Zip [REDACTED]  
Telephone [REDACTED] Fax [REDACTED]  
E-mail [REDACTED]@bellsouth.com

#### Pooling Administrator :

Contact Name Kevin Gatchell  
Contact Address 1800 Sutter St. Ste. 780  
City Concord State CA  
Zip 94520  
Telephone 9253638742 Fax 9253637692  
E-mail kevin.gatchell@neustar.biz

### 1.2 General Information

LRN Needed NO  
NPA 386 LATA 456  
OCN 9417 - BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL  
AOCN 9400 Parent Company OCN 9417

Number of Thousands-Blocks Requested 2

Switch Identification (Switching Identity/POI) DELDFLMADS0

City or Wire Center Name

Rate Center DELAND

Rate Center Sub Zone

### 1.3 Dates

Date of Application 08/27/2002  
Requested Block Effective Date 09/22/2002  
Request Expedited Treatment N

---

**1.4 Type of Service Provider Requesting the Thousands-Block**

---

a) Type of Service Provider **Incumbent Local Exchange Carrier (ILEC)**

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

c) Thousands-Block(s) (NPA-NXX-X) assignment preference **386-785-7 386-785-8**

d) Thousands-Block(s) (NPA-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**

---

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) Polling Administration Guidelines INC 99-0127-023

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# Pooling Administration System

(SP)

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## Months to Exhaust and Utilization Certification Worksheet - TN Level

Block Applicant:

Name of Block Applicant

Title

Telephone Number

Fax Number

E-Mail @bellsouth.com

Date 08/27/2002

OCN 9417

Rate Center DELAND

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X  
(s)

386-626-2,6, 386-734, 386-736, 386-738, 386-740, 386-785-0/2, 386-822, 386-943

- A. Available Numbers
  - B. Assigned Numbers
  - C. Total Numbering Resources
  - D. Quantity of numbers activated in the past 90 days  
and excluded from the Utilization calculation
- List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months

Month 1		Month 2	
Month 3		Month 4	
Month 5		Month 6	

F. Forecast - Next 12 months

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

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

H. Months to Exhaust (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1		8.197
2		10.256

Utilization<sup>5</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \*  
100 84.974

Explanation  
Customer must have consecutive number range with 7700 - 8699 range, so must get 2 blocks to accomodate their 4-digit dialing plan.

[Back](#) [Print](#)

# Pooling Administration System

[Redacted] (SP)

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## Thousands-Block Application Form Part 1B

Tracking Number 386-DELAND-FL-100363

Activation Request

For Information Only N

### Section A :

(If request is for Activation, the thousand-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/ donating switch information, the PA will fill in those three fields. For a Modification request, the requestor is to provide all information.)

### Pooling Administrator :

Contact Name **Kevin Gatchell**  
Contact Address **1800 Sutter St. Ste. 780**  
City **Concord** State **CA**  
Zip **94520**  
Telephone **9253638742** Fax **9253637692**  
E-mail **kevin.gatchell@neustar.biz**

### Block Applicant :

Company Name [Redacted]  
Contact Name [Redacted]  
Contact Address [Redacted]  
City [Redacted] State [Redacted]  
Zip [Redacted]  
Telephone [Redacted] Fax [Redacted]  
E-mail [Redacted]@bellsouth.com

Service Provider NPAC SOA SPID **9417**  
LRN **3867340000**

Block (1K) Range

Block Effective Date **09/22/2002**

Is Block being allocated back to LERG Assignee on donating switch? **No**

NPAC Activate Block Range **Yes**

### Pooling Admin Remarks

[Redacted], 4-digit dialing plan requiring 7700-8699 range.

### Section B :

Class DPC **252040150**  
Class SSN **000**  
LJOB DPC **252202253**  
LJOB SSN **000**  
CNAM DPC **252202232**

5

CNAM SSN 000  
ISVM DPC 252040150  
ISVM SSN 000  
WSMSC DPC  
WSMSC SSN  
SOA Origination

**Section C :**

NPAC is to Activate/Modify t ock (1K), as indicated on this form. When the Block (1K) Activation/Modification is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.)

Block (1K) Request Complete **No**  
Complete Date (MMDDYYYY)  
Complete Time (HHMM)

NPAC Personnel performing change  
Block Holder sent Completed Form **No**  
Mailed Date (MMDDYYYY)  
Mailed Time (HHMM)  
Contact Name

Pooling Administrator sent completed Form **No**  
Mailed Date (MMDDYYYY)  
Mailed Time (HHMM)  
Contact Name

NPAC Remarks



# Pooling Administration System

1 (SP)

Sign Out

## Thousands-Block Application Form Part 1B

Tracking Number 386-DELAND-FL-100363

Activation Request

For Information Only N

### Section A :

(If request is for Activation, the thousand-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/ donating switch information, the PA will fill in those three fields. For a Modification request, the requestor is to provide all information.)

### Pooling Administrator :

Contact Name **Kevin Gatchell**  
Contact Address **1800 Sutter St. Ste. 780**  
City **Concord** State **CA**  
Zip **94520**  
Telephone **9253638742** Fax **9253637692**  
E-mail **kevin.gatchell@neustar.biz**

### Block Applicant :

Company Name  
Contact Name [REDACTED]  
Contact Address [REDACTED] State [REDACTED]  
City [REDACTED]  
Zip [REDACTED]  
Telephone [REDACTED] Fax [REDACTED]  
E-mail [REDACTED]@bellsouth.com

Service Provider NPAC SOA SPID **9417**  
LRN **3867340000**

Block (1K) Range

Block Effective Date **09/22/2002**

Is Block being allocated back to LERG Assignee on donating switch? **No**

NPAC Activate Block Range **Yes**

### Pooling Admin Remarks

[REDACTED] must have 7700-8699 for 4-digit dialing plan

### Section B :

Class DPC **252040150**  
Class SSN **000**  
LIDB DPC **252202253**  
LIDB SSN **000**  
CNAM DPC **252202232**

7



CNAM SSN 000  
ISVM DPC 252046150  
ISVM SSN 000  
WSMSC DPC  
WSMSC SSN  
SOA Origination

**Section C :**

NPAC is to Activate/Modify the Block (1K), as indicated on this form. When the Block (1K) Activation/Modification is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.)

Block (1K) Request Complete **No**

Complete Date (MMDDYYYY)

Complete Time (HHMM)

NPAC Personnel performing change

Block Holder sent Completed Form **No**

Mailed Date (MMDDYYYY)

Mailed Time (HHMM)

Contact Name

Pooling Administrator sent completed Form **No**

Mailed Date (MMDDYYYY)

Mailed Time (HHMM)

Contact Name

NPAC Remarks



# Pooling Administration System

1 (SP)

Sign Out

## Pooling Administrator's Response/Confirmation Part 3

Tracking Number 386-DELAND-FL-100363

Date of Application 08/27/2002

Block Effective Date

Date of Receipt 08/27/2002

Date of Response 08/27/2002

Service Provider Name BELLSOUTH TELECOMMUNICATIONS

(Telcordia™ LERG™ Routing Guide) OCN 9417-BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

NPAC SOA SPID 9417

### Pooling Administrator Contact Information :

Name Kevin Gatchell

Phone 9253638742

Fax 9253637692

E-Mail kevin.gatchell@neustar.biz

### Response

NPA-NXX-X 0-0-0

Block Assigned  
Block Disconnected

Block Contaminated (Yes or No)

Block Allocation Date

Switch Identification (Switching Entity / POI) DELDFLMADSO

Rate Center DELAND

Rate Center Sub Zone

Form Complete, block requested denied

Explanation :

Block Request Denied: MTE is Too High. See Commission for State Waiver.

Assignment activity suspended by the administrator

Explanation :

Further Action :

Back Print

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# Pooling Administration System

 (SP)

Sign Out

## Pooling Administrator's Response/Confirmation Part 3

Tracking Number 386-DELAND-FL-100363

Date of Application 08/27/2002

Block Effective Date

Date of Receipt 08/27/2002

Date of Response 08/27/2002

Service Provider Name BELLSOUTH TELECOMMUNICATIONS

(Telcordia™ LERG™ Routing Guide) OCN 9417-BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

NPAC SOA SPID 9417

### Pooling Administrator Contact Information :

Name Kevin Gatchell

Phone 9253638742

Fax 9253637692

E-Mail kevin.gatchell@neustar.biz

### Response

NPA-NXX-X 0-0-0

Block Assigned  
Block Disconnected

Block Contaminated (Yes or No)

Block Allocation Date

Switch Identification (Switching Entity / POI) DELDFLMADS0

Rate Center DELAND

Rate Center Sub Zone

Form Complete, block requested denied

Explanation :

Block Request Denied: MTE Too High. See Commission for State Waiver.

Assignment activity suspended by the administrator

Explanation :

Further Action :

Back Print

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386 NPA  
 DELAND MTE SUMMARY  
 REPORT  
 JULY 2002

ATTACHMENT 3

A B C

NPA 386 TMRC	CLLI	SW TYPE	WC	NPA	TTA	EN	K-BLK TOTAL	AVAIL	AVG GRTH PER MO.	MTE	NON CTM DONATABLE BLOCKS	CTM DONATABLE BLOCKS	CTM COUNTS
DELAND	DELDLFDMS0	DMS-100	DN	386	734	Q	65						
<b>TOTAL</b>	<b>TOTAL</b>						65				1	0	0
<b>Customer Contact Information</b>													
[REDACTED]													
[REDACTED]													
[REDACTED]													
[REDACTED]													
[REDACTED]													
[REDACTED]													
[REDACTED]													

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