

ORIGINAL

Legal Department

Nancy B. White
General Counsel - Florida

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

August 4, 2003

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

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AUG -4 PM 4:47
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CLERK

Re: Docket No.: 030753-TZ
**Petition for Expedited Review of Growth Code Denials by the North
American Numbering Administration for the Miami (Red Road - 2)
and Keys (Key Largo) Exchanges**

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 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. Copies have been served to the parties
shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (KA)

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

DOCUMENT NUMBER DATE

07080 AUG -4 03

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CERTIFICATE OF SERVICE

Docket No.: _____


**Petition for Expedited Review of Growth Code Denials by the North
American Numbering Administration for the Miami (Red Road -2) and
Keys (Key Largo) Exchanges**

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

U.S. Mail this 4th day of August, 2003 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
Tel. No.: (407) 389-8929
Fax. No.: (407) 682-1108
thomas.foley@neustar.com



Nancy B. White (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the Miami (Red Road -2) and Keys (Key Largo))
exchanges)
_____)

Docket No.

Filed: August 4, 2003

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 Miami and Keys exchanges. 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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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, Keys, Miami, North Dade, Orlando, Palm Coast, Weekiwachee Springs, 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.

MIAMI

12. The Miami exchange consists of twenty-four (24) central offices and twenty-eight (27) switching entities that utilize numbering resources: Airport (MIAMFLAPDS0), 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 (MIAMFLME32E), Miami Shores (MIAMFLSH75E), North Miami (MIAMFLNMDS0), Northside (MIAMFLNSDS0), Opa Locka (MIAMFLOLDS0), Palmetto (MIAMFLPLDS0 and MIAMFLPLRS0), Poinciana (MIAMFLPBDS0), Red Road (MIAMFLRRDS0), Silver Oaks

(MIAMFLSODS0), West Dade (MIAMFLWDDS0), and West Miami (MIAMFLWMDS0).

13. On July 18, 2003, BellSouth requested additional numbering resources from NeuStar for the Miami - Red Road (MIAMFLRRDSO) switch. See Attachment 1. Specifically, BellSouth requested three (3) 1,000 consecutive number block in order to meet the customer's request for 3,000 numbers in the range of NPA NX2 which is the range that will meet the customer's dialing patterns.

14. At the time of the code request, the Miami exchange had a MTE of 15.1 – 15.2 and a utilization of 76.564%, while the MTE for the Red Road (MIAMFLRRDSO) switch was – 5.27.

15. On July 18, 2003, NeuStar's automated number request system 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 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 Miami exchange and the customer contact information. See Attachment 2.

KEYS

16. The Keys exchange consists of eight (8) central offices and switching entities that utilize numbering resources: Big Pine Key (BGPIFLMARS0), Islamorada (ISLMFLMARS0), Marathon (MRTHFLVERS0), Key Largo Main (KYLRFLMARS0), Key Largo Sound (KYLRFLLSRS0), Key West (KYWSFLMADS0), N. Key Largo Main (NKLRFLMARS0) and Sugarloaf Key Main (SGKYFLMARS0).

17. On July 22, 2003, BellSouth requested additional numbering resources from NeuStar for the Key Largo Main (KYLRFLMARS0) switch.¹ See Attachment 3. Specifically, BellSouth requested two (2) 1,000 consecutive number block in order to meet the customer's request for 2,000 numbers in the range of NPA NX4-1XXX and NPA NX4-3XXX, which is the range that will meet the customer's dialing patterns.

18. At the time of the code request, the Keys exchange had a MTE of 950 and a utilization of 70.97%, while the MTE for the Key Largo Main (KYLRFLMARS0) switch was – 51.73.

19. On July 22, 2003, NeuStar's 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.² See Attachment 4. 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 Keys exchange and the customer contact information. See Attachment 5.

20. 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).

21. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service

¹ Due to NeuStar's system being unavailable to make code requests, BellSouth filed this request via fax.

² Due to NeuStar's system being unavailable to make code requests, BellSouth received the code denial via fax.

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.

22. 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.

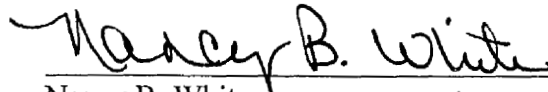
(c) As a result of NeuStar's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

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

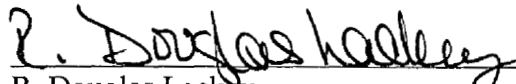
Respectfully submitted this 4th day of August, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



Nancy B. White (KA)

James Meza III
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558



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

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NEU STAR

Request For Resolution [paniponterfield@bridge.bellsouth.com \(SP\)](#) Sign Out

Request Resources

State: FLORIDA
 NPA: 786
 Rate Center: MIAMI
 GCN: 9417-BELL SOUTH SO BELL
 Type of Application: Application for Individual Blocks
 Quantity of Blocks Requested: 3

Continue Cancel

NOTE
 If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs

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Type of Application : New

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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: 30375

Contact Name
 Contact Address
 City
 Zip
 Telephone
 E-mail: [redacted]@bridge.bellsouth.com

Pooling Administrator :

Contact Name: Mr Gary Zahn
 Contact Address: 1880 Sutter St, Ste. 780
 City: Concord
 State: CA
 Zip: 94520
 Telephone: 9253638753
 Fax: 9253637688
 E-mail: gary.zahn@neustar.biz

1.2 General Information

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LRN Needed No

NPA 786 LATA 460

CCN 9417 BILL SOUTH SO
BLLI

ACCN 9400 Parent Company CCN 9417

Number of Thousands-Blocks Proposed 3

Switch/Local Center (including Identity/POI) miamiflds0 City of Wire Center Name miami

Rate Center MIAMI Rate Center Sub Zone

1.3 Dates

Date of Application Friday, July 18, 2003

Requested Block Effective Date

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider Incumbent Local Exchange Carrier (LEC)

b) Primary type of service blocks to be used for Wireline

Done

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- Logon order path
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- NewStar Number Pool Admin...



c) Thousands-Block(s) (NPA-NXXX) assignment preference

Click here to see the available blocks in the pool >>>

Delete

d) Thousands-Block(s) (NPA-NXXX) that are undesirable for this assignment, if any >>>

Delete

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) N/A

1.5 Type of Request

Initial block for rate center Yes

Growth block for rate center Yes

Change block N/A

Disconnect block N/A

Done

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Request For Resol
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 Modify
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 Block Transfer
 Confirm Block(s) in
 Search Forms
 Submit Forecast
 User Profile
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 Reports

d) Thousands Block(s) (NPA(NXX)) 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): N/A

1.5 Type of Request

Initial block for rate center Yes
 Growth block for rate center Yes
 Change block N/A
 Disconnect block N/A

I hereby certify that the above information requesting an NXX 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) Pooling Administration Guidelines INC 99-0127-023

Continue Cancel

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NEU STAR

Date: Friday, July 10, 2003
 GCN 9417

Company Name
 Rate Center MIAMI

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

(305) 284, 661, 662, 663, 665, 666, 667, 668, 669, 689, 740 (786)
 268, 624, 662, 999, 624, 621, 552, 470, 308, 337, 317, 314, 275, 265, (305)
 243, 250, 260, 261, 262, 263, 264, 265, 266, 267, 269, 270, 271, 273, 274, 275, 279, 285, 324, 321
 326, 341, 357, 361, 365, 412, 438, 441, 442, 443, 444, 445, 446, 447, 448, 460, 461, 476, 492, 52
 526, 529, 541, 545, 547, 548, 549, 550, 560, 567, 569, 571, 572, 573, 576, 585, 595, 596, 631, 6
 634, 635, 636, 637, 638, 642, 643, 644, 646, 648, 649, 670, 671, 728, 751, 754, 756, 757, 758, 7
 762, 774, 795, 805, 854, 856, 857, 858, 859, 860, 861, 863, 864, 865, 866, 867, 868, 869, 870, 8
 874, 876, 882, 883, 884, 885, 887, 888, 889, 891, 892, 893, 895, 899, 906, 981, 993

Name of Block Applicant: _____
 Title: TN Administration Specialist
 Telephone Number: (205) 977-3025
 Fax Number: _____
 E-Mail: _____@bridge.bellsouth.com

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: _____

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 Confirm Block(s) in
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 Reports

LIST EXHAUSTED UNDERLYING BLOCKS

E Growth History - Previous 6 months

Month 1	[Bar]	Month 2	[Bar]
Month 3	[Bar]	Month 4	[Bar]
Month 5	[Bar]	Month 6	[Bar]

F Forecast Next 12 months

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

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

H Months to Exhaust (Numbers Available for Assignment to customers (A) - Average Monthly Forecast (B))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[Bar]	45,123
2	[Bar]	15,157
3	[Bar]	15,191

Utilization (Assigned Numbers (B) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100

76,564

Explanation:

customer request

- 1 A 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.
- 2 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 the current month.
- 3 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
- 4 To be assigned an additional thousands-block (NXX-X) for growth,

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 - Alabama 3 state Capital Home

Pooling Administration System

NEUSTAR

Request For Reso [redacted]@ridge.tellsouth.com (SP) Sign Out

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

You have been selected to participate in the system to manage

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

Submit Cancel

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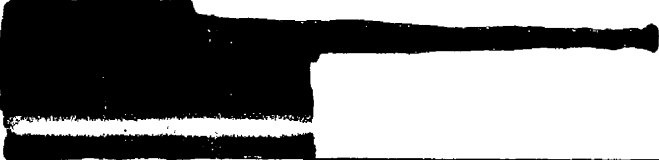
305/786 NPAs
Miami Number Pooling Summary Report
July 2003

Attachment 2

TMRC NPA	Office Name	CLLI	K-BLOCK TOTAL	AVAIL	AVG GRWTH PER MO	MTE
MIAMI	Alhambra	MIAMFLAEDS0	171	████████	████████	████████
MIAMI	Alhambra	MIAMFLAERS0	8	████████	████████	████████
MIAMI	Allapattah	MIAMFLAL63E	60	████████	████████	████████
MIAMI	Airport	MIAMFLAPDS0	79	████████	████████	████████
MIAMI	Bayshoe	MIAMFLBA85E	81	████████	████████	████████
MIAMI	Biscayne	MIAMFLBCDS0	46	████████	████████	████████
MIAMI	Miami Beach	MIAMFLBRDS0	114	████████	████████	████████
MIAMI	Canal	MIAMFLCADS0	194	████████	████████	████████
MIAMI	Dadeland Blvd.	MIAMFLDBRS1	18	████████	████████	████████
MIAMI	Flagler	MIAMFLFLDS0	73	████████	████████	████████
MIAMI	Grande	MIAMFLGRDS0	39	████████	████████	████████
MIAMI	Grande	MIAMFLGRDS1	429	████████	████████	████████
MIAMI	Hialeah	MIAMFLHLDS0	251	████████	████████	████████
MIAMI	Indian Creek	MIAMFLICDS0	70	████████	████████	████████
MIAMI	Key Biscayne	MIAMFLKEDS0	23	████████	████████	████████
MIAMI	Metro	MIAMFLME32E	100	████████	████████	████████
MIAMI	North Miami	MIAMFLNMDS0	60	████████	████████	████████
MIAMI	Northside	MIAMFLNSDS0	65	████████	████████	████████
MIAMI	Opa Locka	MIAMFLOLDS0	64	████████	████████	████████
MIAMI	Poinciana	MIAMFLPBDS0	95	████████	████████	████████
MIAMI	Paimetto	MIAMFLPLDS0	339	████████	████████	████████
MIAMI	Palmetto	MIAMFLPLRS0	15	████████	████████	████████
MIAMI	Red Road	MIAMFLRRDS0	128	████████	████████	████████
MIAMI	Miami Shores	MIAMFLSH75E	79	████████	████████	████████
MIAMI	Silver Oaks	MIAMFLSODS0	126	████████	████████	████████
MIAMI	West Dade	MIAMFLWDDS0	91	████████	████████	████████
MIAMI	West Miami	MIAMFLWMDS0	107	████████	████████	████████

305/786 NPAs
Miami Number Pooling Summary Report
July 2003

Attachment 2

TMRC NPA TOTAL	Office Name	CLLI	K-BLOCK TOTAL	AVAIL	AVG GRWTH PER MO	MTE
Customer Contact Information						
						

Form 1A
(one form per CLLI)

THOUSAND BLOCK APPLICATION PRE-ENTRY FORM

1.1	Contact Information
Company Name	BellSouth Telecommunications Inc
Headquarters Address	675 West Peachtree St. NE
City, State, Zip	Atlanta GA 30375
Contact Name	[REDACTED]
Contact Address	[REDACTED]
City, State, Zip	Birmingham AL 35243
Phone	[REDACTED]
E-mail Address	_____

1.2A	Required when K-Block is needed for an LRN
NPA	
LATA	<i>Normally only use</i>
OCN	<i>part 1.2B</i>
AOCN	
Parent Co. OCN	

of Blocks Req'd _____
 # of Full NXX Req'd _____
 Switch ID _____
 Wire Center Name _____
 Rate Center _____
 Rate Center Sub Zone _____
 Homing Tandem OC _____
 Tandem Homing CLLI _____

1.2B	Required when no LRN is needed
NPA	305
LATA	460 / F7
OCN	9417 (9417 or 9419)
AOCN	9400
Parent Co. OCN	_____ (9417 or 9419)

of Blocks Req'd 2
 # of Full NXX Req'd _____
 Rate Center keys
 Switch ID (CLLI) kylrfilmars0

1.3	Dates
Date of Appl.	
Requested Block Eff. Date	

Request for Expedite x YES NO (usually no - update as needed per request)

**Form 1A
(one form per CLLI)**

THOUSAND BLOCK APPLICATION PRE-ENTRY FORM

1.4 Type of Service Provider Requesting the Thousand Block
a) X ILEC IXC CMRS Other
b) Primary type of svc blk to be used for: Wireline
c) K-Block NXX-X assign preference
d) K-Block NXX-X undesirable

1.5 Type of Request
Initial code for rate center? If yes, attached evidence of auth. & proof of capability to provide svc w/in 60-days
Growth code for rate Center? Yes If yes, attach months to exhaust worksheet
Update Information? YES NO

1.7
If K-block request for new application for existing switch, please explain. customer requested

1.8
Do NPA jeopardy criteria apply? YES NO
Signature

(one form for each block requested)

Section A

Contact Information

Co Name BellSouth Telecommunications Inc

Contact Name [REDACTED]

Address [REDACTED]

City, State, Zip [REDACTED] [REDACTED] [REDACTED]

Phone [REDACTED]

Fax [REDACTED]

[REDACTED] @bellsouth.com

Svc Provider NPAC SOA SPID 9417 (always 9417 even if OCN is 9419)

Rate Center keys

LRN [REDACTED]

NPAC Activate Block Range X YES NO

Section B

Block Applicant to provide only if NPAC Activate Block Range is marked "YES"

Class DPC [REDACTED]

Class SSN [REDACTED]

LIDR DPC [REDACTED]

 3 SSN [REDACTED]

 NAM DPC [REDACTED]

 4 SSN [REDACTED]

 M DPC [REDACTED]

ISVM SSN [REDACTED]

WSMSC DPC [REDACTED] When entering data into PAS, leave these spaces blank

WSMSC SSN [REDACTED] When entering data into PAS, leave these spaces blank

SOA Origination [REDACTED] When entering data into PAS, leave these spaces blank

Remarks

(one form for each block requested)

Contact Information

Date
OCN
Co. Name
Rate Center

9417
BellSouth Telecommunications
Miami

List Full NPA(s) - NXX(s) and Block NPA(s) - NXX-X(s) included in growth calculation

305-289,743,305-744 0,3,7-9,745(305)451,453 0-1,3-5,7-9(305)367 0,2-6,8-9 (305)517 0,2,4,9,664
(305)852,853(305)292,293,294,,295,296,809

List all @ RC level

Title
Phone
Fax

Network Manager
[Redacted]
[Redacted]

A.

Available Numbers
Assigned Numbers
Total Numbering Resources
Qty of numbers activated in past 90 days

[Redacted]
[Redacted]
[Redacted] (* =Total Installed - Intermediate)
[Redacted]

B.

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

Previous 6-month growth history

[Redacted] (Oldest)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted] (Most Current)

C.

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

Forecast - Next months 1-12

[Redacted] (Current)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted] (Future)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Add quantity to be used by customer in appropriate forecasted month if we're making request for specific cust request we cannot fill from current inventory.

(one form for each block requested)

D.

Avg Mo Forecast
(From part C above divided by 6)

E.

MTE = TN's available for Assgn / Avg Mo Forecast

54.95

Utilization Percentage = Assigned / Total Resources

70.97%

Explanation

--

Newly acquired numbers may be excluded from the utilization calculation. Please refer to the FCC 00-104 for reporting requirements.

Confirmation of NXX-X Block Activation

Name of Auth. Rep Signature of

Co/Entity

Title

E-mail

Date

Network Manager

@bellsouth.com

1. NPA-NXX-X block(s)

2. Switch ID (Switching Entity/POI)

3. Date block(s) put in svc

NOTE: State commissions may request proof from all block holders that NXX-X block(s) have been activated and assignment of the numbers has commenced.

Date of Block Allocation:

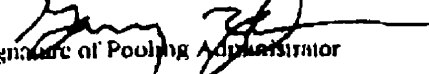
Attachment 4

September 24, 2001
Pooling Administrator's Response/Confirmation
Part 3

Attachment 3

Date of Application 7/22/03 Block Effective Date _____
Date of Receipt 7/22/03 Date of Response 7/22/03
Service Provider Name **BELLSOUTH TELECOMMUNICATIONS**
(Telcordia™ LERG™ Routing Guide) OCN- 9417
NPAC SOA SPID _____

Pooling Administrator Contact Information:

Signature of Pooling Administrator  Phone 925-363-8753
Name (print) Gary Zahn Fax 925-363-7688
E-mail gary.zahn@newsstar.biz

NPA-NXX 305 Block Assigned _____
Block Disconnected _____
Block Contaminated (Yes or No) _____
Block Allocation Date _____

Switch Identification (Switching Entity / POI) KYLRFLMARS0
Rate Center KEYS
Rate Center Sub Zone _____

Form complete, block request denied
Explanation: **DR-10: The Thousands-Block Number Pooling Administration Guidelines (Section 8.3.4) states that applicants must demonstrate that existing numbering resources for the rate center will exhaust within 6 months.**

Assignment activity suspended by the administrator
Explanation:

Further Action:

! 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 (Telcordia, LERG Routing Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

September 24, 2001

Attachment 3

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

**305/786 NPAs
Miami Number Pooling Summary Report
July 2003**

Attachment 5

Exchange	Office Name	CLLI	K-BLOCK TOTAL	AVAIL	AVG GRWTH PER MO	MTE
Keys	Big Pine Key	BGPIFLMARS0	15	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Islamorada	ISLMFLMARS0	14	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Marathon	MRTHFLVERS0	20	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Key Largo Main	KYLRFLMARS0	19	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Key Largo Sound	KYLRFLLSRS0	18	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Key West	KYWSFLMADS0	60	[REDACTED]	[REDACTED]	[REDACTED]
Keys	North Key Largo Main	NKLRFLMARS0	8	[REDACTED]	[REDACTED]	[REDACTED]
Keys	Sugarloaf Key Main	SGKYFLMARS0	15	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL				[REDACTED]	[REDACTED]	[REDACTED]

Customer Contact Information

[REDACTED]