



Susan S. Masterton

Law/External Affairs

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April 9, 2004

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

Re:

Docket No. 040319-TZ

Petition for Expedited Review of Growth Code Denials by the North American Numbering Administration for the Fort Myers and North Cape Coral Exchanges

Dear Ms. Bayó

Enclosed are the original and fifteen copies of Sprint's Petition for Expedited Review of NXX-X Code Denial and the original and fifteen copies of Sprint's Request for Confidential Classification, 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,

Susan S. Masterton

Enclosure

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04437 APR-9 a

# CERTIFICATE OF SERVICE DOCKET NO.

1 HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 9<sup>th</sup> day of April, 2004 to the following:

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

NANPA Tom Foley, Relief Planner Eastern Region 820 Riverbend Blvd. Longwood, FL 32779-2327

3600 5. M& 6 12

Susan S. Masterton

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth	)	Docket No. 040319 - 1
Code Denials by the North American Numbering	)	
Administration for the Fort Myers and North	)	
Cape Coral Exchanges	)	Filed: April 9, 2004
	)	

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

Sprint-Florida, Incorporated ("Sprint"), 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-01-1973-PCO-TL, petitions the
Commission to review the Pooling Administrator's ("NeuStar") denial of Sprint's request
for additional numbering resources in the Fort Myers and North Cape Coral exchanges.
In support of this petition, Sprint states:

## **PARTIES**

- 1. Sprint is 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 provision provides that a carrier may challenge NeuStar's decision to
deny numbering resources to the appropriate regulatory authority.

O 4437 APR-9 & FPSC-COMMISSION CLERK

# 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.
- 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 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 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 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 70 percent for the specific rate center. See INC Guidelines Section 4.3(c) [INC99-0127-023 Issued March 23, 2004] and Appendix 3. These requirements are known as the six (6) months-to-exhaust ("MTE") and utilization threshold.
- 8. Sprint has utilized mechanisms such as number pooling to manage its numbering resources in the most efficient manner. However, Sprint is required in this instance to petition the Commission for relief.
- 9. 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 BellSouth's Petition and the

Commission's efforts to make numbering resources available to carriers, the commission issued Order No. PSC-01-1973-PCO-TL setting forth an expedited code denial process. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

- 10. The Fort Myers Exchange consists of eight (8) central offices and eight (8) switching entities that utilize numbering resources: Alva (ALVAFLXARS1), Cypress Lake (CYLKFLXADS0), Regional Airport (CYLKFLXBRS0), Fort Myers (FTMYFLXADS0), East Fort Myers (FTMYFLXBRS0), South Fort Myers (FTMYFLXCDS2), Cypress Lake Iona/Punta Rassa (IONAFLXARS0), Cypress Lake San Carlos Park (SCPKFLXARS0).
- The North Cape Coral Exchange consists of one (1) central office and one
   switching entity that utilizes numbering resources: North Cape Coral
   (CPCRFLXBDS1).
- On March 17, 2004 Sprint requested additional numbering resources from NeuStar for the Fort Myers and North Cape Coral exchanges. See Attachment 1. Specifically, in order to meet the telephone number needs of one of its customers, Sprint requested four 1,000 consecutive number blocks in the North Cape Coral exchange and a complete NXX (10,000 numbers) in the Fort Myers Exchange, broken down as follows: two 1,000 consecutive number blocks in South Fort Myers, four 1,000 consecutive number blocks in Cypress Lake and four 1,000 consecutive number blocks in Fort Myers. The customer has requested sequential

DID numbers and Sprint cannot currently meet this request given the inventory of numbers available at this time in these switches.

- 13. At the time of the code request, the Fort Myers exchange had a MTE of 597 and a utilization of 62.15%. On a switch basis, the Fort Myers switch (FTMYFLXADS0) has an MTE of 533 and utilization of 66%, the Cypress Lake Switch (CYLKFLXADS0) has an MTE of 102 and utilization of 78% and the South Fort Myers Switch (FTMYFLXCDS2) has an MTE of 533 and a utilization of 66%. There are no blocks of un-assigned numbers large enough to meet the request of this customer in any of these three switches.
- 14. At the time of the code request, the North Cape Coral exchange had a MTE of 100 and a utilization of 75.99%.
- 15. On March 18, 2004, NeuStar denied Sprint's request for additional numbering resources because Sprint had not met the utilization criteria, notwithstanding the fact that Sprint's North Cape Coral office has a utilization of 75.99%, the South Fort Myers office has a utilization of 78%, and none of these switches have available blocks of numbers in sufficient quantity to meet the customer's requirements. See Attachment 1. Attached to this Petition are the MTE and utilization rate data for the switches in the Fort Myers Exchange and for the North Cape Coral switch. See Attachment 2.
- 16. Sprint's request for additional numbering resources to meet this customer's requirement in the Fort Myers and North Cape Coral Exchanges would not materially impact exhaustion of available numbers in the 239 area code. (The 239 NPA is currently scheduled to exhaust 4Q2017.)

- 17. As discussed above, both the FCC Order and INC guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).
- 18. Under earlier 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 and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.
- 19. Sprint's inability to provide this customer with the requested blocks of numbers prevents Sprint from providing the quality of service this customer desires and expects.
- This Commission has previously received similar requests from BellSouth Telecommunications, Inc. in which BellSouth asked the PSC to overrule a decision of NANPA and NeuStar. See Docket Nos. 040183-TL, 030699-TL and 030590-TL. The Commission has granted BellSouth's requests (Orders PSC-04-0311-PAA-TL, PSC-03-0937-PAA-TL, and PSC-03-0854-PAA-TL).
- 21. Sprint requests that the Commission reverse NeuStar's decision to withhold numbering resources from Sprint on the following grounds:

(a.) NeuStar's denial of numbering resources to Sprint interferes with Sprint's ability to serve its customers within the State of Florida.

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

WHEREFORE, Sprint requests:

1. The Commission review the decision of NeuStar to deny Sprint's request for additional numbering resources for the Fort Myers and North Cape Coral exchanges; and

2. The Commission direct NeuStar to provide the requested numbering resources for the Fort Myers and North Cape Coral exchanges as discussed above.

Respectfully submitted this 9<sup>th</sup> day of April, 2004.

Susan S. Masterton Attorney for Sprint

P.O. Box 2214

Tallahassee, FL 32316-2214

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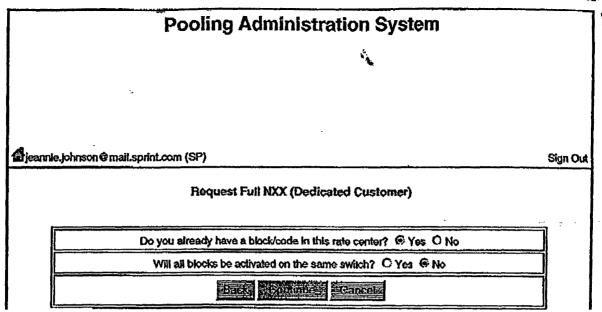
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<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

4 To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))



# **Pooling Administration System** Sign Out Request Resources State FLORIDA NPA 239 Rate Center FORT MYERS OCN 0341-SPRINT UNITED TEL FL Type of Application Application for a full NXX for a Dedicated Customer 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.

ATTACHMENT **Pooling Administration System** Sign Out dieannie.johnson@mail.sprint.com (SP) Months to Exhaust and Utilization Certification Worksheet - TN Level 3 Date Wednesday, March 17, 2004 OCN 0341 Company Name SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA Rate Center FORT MYERS List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s) 239-225,0,1,2,4,6,7,9;226;267;274;275;277;278;332;334;335;336,0,1,2,3,5,6,7,8; 337;338,0,1,2,3,4,5,6,9;339,0,1,2,4,5,6,8,9;344,0,1,2,3,4,5;415;418;432;433;437; 454;461;466;476,6,7,8,9;477;479;481;482;489;561;590;690;693;694;728;768;931;936; 938,0,1,2,3,4,5,6,7,9;939;985,0,1,2,3,7,8,9. Name of Block Applicant Ms Gloria J Johnson 15 Title Switch Design Analyst 16 Telephone Number (407) 889-6159 Fax Number (407) 889-1595 18 E-Mail jeannie.johnson@mail.sprint.com A. Available Numbers B. Assigned Numbers 21 C. Total Numbering Resources ' D. Quantity of numbers activated in the past 90 22 days and excluded from the Utilization calculation 24 List excluded Code(s) or Block(s) E. Growth History - Previous 6 months2 \* 25 Month 2 Month 1

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

H. Months to Exhaust 4 (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Explanation

is installing a new communication system and they need phone numbers from four different central offices.

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.

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.

3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

 To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

 Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

Show Calculations are described in an area

ATTACHMENT 1

# **Pooling Administration System**

P& 6

a jeannie.johnson@mail.sprint.com (SP)

Sign Out

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

Your utilization calculates to 62.151 percent, while your State requires a utilization of 70,000 percent.

## 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 fresh Part 1A
- C) State Walver Option



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ATTACHMENT 1

<sup>1</sup> 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.

<sup>2</sup> Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #8 as the current month.

<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Extraust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (III)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

		INCHMENT
1	Pooling Administration System	PG- S
a	# jeannie.johnson@mail.sprint.com (SP)	Sign Out
3	Months to Exhaust and Utilization Certification Worksheet - TN Level	
4567	Date Wednesday, March 17, 2004 OCN 0341 Company Name SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORI Rate Center NORTH CAPE CORAL	<b>IDA</b>
89	List all Codes NPA(s)-NXXs and Blocks NPA(s)- NXX-X(s)	
10	239-242; 458; 573; 574; 772	
11	Name of Block Applicant Ms Gloria J Johnson	
12	Title Switch Design Analyst	
13	Telephone Number (407) 889-6159 Fax Number (407) 889-1595	
15	E-Mail jeannle.johnson@mail.sprint.com	
16	A. Ayailable Numbers *	
17	B. Assigned Numbers *	
18	C. Total Numbering Resources*	
20	D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation	
91	List excluded Code(s) or Block(s) .	****
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Page 1 of 1 ATTACHMENT 1 Pa 12 **Pooling Administration System** @jeannie.johnson@mail.sprint.com (SP) Sign Out Request Resources State FLORIDA NPA 239 Rate Center NCAPECORAL OCN 0341-SPRINT UNITED TEL FL Type of Application Application for a full NXX for a Dedicated Customer 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.

ATTACHMENT 1

# **Pooling Administration System**

peannie.johnson@mail.sprint.com (SP)

Sign Out

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

Your utilization calculates to 7.599 percent, while your State requires a utilization of 70.000 percent.

### 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 fresh Part 1A
- O State Waiver Option



Appendix 3 - Modified Augus	ONTHS TO EXHAUS	ST and UTILIZATIO	ÓN CERTIFIC	ATION WORK	  SHEET = 1	「N Level <sup>1</sup>	. 1	ATTACH	MENT 1
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Name of Block Applicant:SPRI			Signature						
7 List all Codes NPA(s)-NXXs and Bloc	ksNPA(s)-NXX-X(s):	239-242,458,57;	3.574.772				<del></del>		4
Title:					-		No.;		
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F. Forecast – Next 12 months <sup>3</sup>									
G. Average Monthly Forecast (Sum of mont	ths #1-6 (Part F above) div	ided by 6):							
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istrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup> 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.

<sup>3</sup> 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, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

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19	F.	Forecast – Next 12 months <sup>3</sup>												
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a١	н.	Months to Exhaust <sup>4</sup>	`` !	Numbe	rs Available Average	for Assignment Monthly Fore	nt to Custo cast (G)	omers (A)		=	,102			ţ
28	١.	Utilization <sup>5</sup>	· T	<u>Assigned Notal Numberin</u>	lumbers (B) g Resource	- Excluded N s (C) - Exclud	umbers (D ed Numbe	<u>))</u> rs (D)	* 100	=	78%			
23 24	Exp	planation: Cust need conse ost of the available numbers are so	cutive nun	nbers for a r dividual nun	new teleconbers, sor	ommunicati ne of which	ons syst are un-	em. The la	rgest bloc	k of un-a	ssigned n	umbers in	this excha	ange is
											·	·		

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.

<sup>2</sup> 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.

<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

これず		ST and UTILIZATION CERTIFICATION WORK nds-Block Number Pooling Growth Block Re		PG 14
4	Date:4/7/04OCN: Company Name: _SPRINT			
5	Rate Center: _ Ft Myers, FI -Ft Myers Switch			
し	Name of Block Applicant:SPRINT	Signature:		
7	List all Codes NPA(s)-NXXs and BlocksNPA(s)-NXX-X(s):	239-226,332,334,335,336,337,338, 339, 344	, 461, 476, 477, 479	
જ	Title:	Telephone No.:	FAX No	
9	E:Mail	_		, h
10	A. Available Numbers:			₩ •
1)	B. Assigned Numbers:			÷
12	C. Total Numbering Resources:		; ;	f
13 14	D. Quantity of numbers activated in the past 90 days and electronic List excluded Code(s) or Block(s):	excluded from the Utilization calculation:		
16	, 1410/101	Month Month Month Month Month #3 #4 #5 #6 #7		Month Month Month #10 #11 #12
17				
19	F. Forecast – Next 12 months <sup>3</sup>			
20	G. Average Monthly Forecast (Sum of months #1-6 (Part F above) div	wided by 6):		
a	H. Months to Exhaust <sup>4</sup>	ers Available for Assignment to Customers (A) Average Monthly Forecast (G)	= :_0	
22	I. Utilization <sup>5</sup> Assigned I	Numbers (B) - Excluded Numbers (D) ing Resources (C) - Excluded Numbers (D)	0 = _75%	
23 2L	Explanation: Cust needs consecutive numbers for which are un-aged. The largest consecutive range we have	new telecommunications system. The availab	le numbers are single nu	mbers awaiting re-use, some of
	, and the second			:

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<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Appendix 3 - Modified Augu る ろ		THS TO			TILIZATIOI k Number					l Level <sup>1</sup>	ATT	ACHM PG	15
니 Date:4/7/04 OCN: Com	pany					_		•	•	#			
5 Rate Center: _Ft Myers, Fl- South F	t My	ers Switc	:h										<del></del>
( Name of Block Applicant:SPF	λίΝΤ <u>.</u>			·		Signatu	·e:	<del></del>					
7 List all Codes NPA(s)-NXXs and Blo													
ਰ Title:	<u> </u>			·	Telephon	e No.:				FAX	No.:		
9 E:Mail				_									
o A. Available Numbers:	·*)								(				
	<del></del>								1			v.	
N B. Assigned Numbers:	<u> </u>								* *				
🕽 C. Total Numbering Resources:			<del>-,</del>										
3 D. Quantity of numbers activated in List excluded Code(s) or Block(	the p	past 90 c	days and e	excluded	from the U	tilization c	alculation:		<del>-</del>				
15 16	300 Sec. 5.	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
7 E. Growth History - Previous months <sup>2</sup>	6												:
9 F. Forecast – Next 12 months <sup>3</sup>	1												:
O G. Average Monthly Forecast (Sum of m	onths:	#1-6 (Part	F above) div	vided by 6):	#								
· \ H. Months to Exhaust <sup>4</sup>	-1-1		Numbe	ers Available QarevA	e for Assignm Monthly Fo	ent to Custo recast (G)	mers (A)		= ;	533			'
2 I. Utilization5	€ 1	Tot	<u>Assigned Numberin</u>	Numbers (B	) – Excluded es (C) – Exclu	Numbers (D ded Numbe	s (D)	* 100	=	66%	_		
23 Explanation: Cust-needs	of e	cons	secutiv	ve nun	mbers f	or a	new t	elecom	munica	tions	syster	n. We	have
requests. Most of the	e 'ui	n-ass:	igned :	number	s in t	nis ex	change	is sca	attere	d indi	vidual	numbe	rs most
which are un-aged.	<del>- ; -</del>												
	ì												-

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<sup>2</sup> 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.

<sup>3</sup> 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, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

 $<sup>^{5}</sup>$  Newly acquired numbers may be excluded  $f_{\chi}^{\omega}$  on the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

# Attachment 2

# Fort Myers Exchange and North Cape Coral Exchange Utilization Summary Report & Customer Contact Information

		* *				
A	B	C	D	<u>F</u>	F	G
Exchange	Central	Wire Center	Blocks	Avg	Available	MTE
_	Office	CLLI	ļ	Growth Per	TNs	
				Month		
North Cape	North	CPCRFLXBDS1	50			
Coral	Cape Coral					
Fort Myers	Cypress	CYLKFLXADS0	117			
	Lake					
Fort Myers	Fort Myers	FTMYFLXADS0	127			
Fort Myers	South Fort	FTMYFLXCDS2	89			
	Myers					
Fort Myers	Alva	ALVAFLXARS1	10			
Fort Myers	Regional	CYLKFLXBRS0	27			
	Airport					
Fort Myers	East Fort	FTMYFLXBRS0	30			
	Myers					
Fort Myers	Iona	IONAFLXARS0	20			
Fort Myers	San Carlos	SCPKFLXARS0	20			
	Park					
	North Cape Coral Fort Myers	North Cape Coral Fort Myers Fort	North Cape Coral  Fort Myers Fort	Exchange Central Office CLLI  North Cape Office CPCRFLXBDS1 50  Coral Cape Coral Cypress CYLKFLXADS0 117  Lake Fort Myers Fort Myers FTMYFLXADS0 127  Fort Myers South Fort Myers FTMYFLXCDS2 89  Fort Myers Alva ALVAFLXARS1 10  Fort Myers Regional Airport Fort Myers East Fort Myers FTMYFLXBRS0 30  Fort Myers Iona IONAFLXARS0 20  Fort Myers San Carlos SCPKFLXARS0 20	Exchange Central Office CLLI  North Cape Coral Cape Coral  Fort Myers Cypress Lake  Fort Myers South Fort Myers  Fort Myers Alva ALVAFLXARS1 10  Fort Myers Regional Airport  Fort Myers East Fort Myers  Fort Myers CyLKFLXBRS0 30  Fort Myers Alva ALVAFLXBRS0 30  Fort Myers East Fort Myers  Fort Myers San Carlos SCPKFLXARS0 20	Exchange Central Office CLLI Blocks Avg Growth Per Month  North Cape Coral Cape Cape Coral Cape Cape Coral Cape Cape Cape Cape Cape Cape Cape Cape

