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May 19, 2004

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

040480-TL

Re: [REDACTED] REQUEST FOR NUMBERS

Dear Ms. Bayo:

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 [REDACTED] uncontaminated 1,000 number blocks for [REDACTED] in Tampa, Florida.

Verizon considers the highlighted information in this letter to be confidential because it contains the customer's name and the customer's planned use of the requested numbers. 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 Ms. [REDACTED]. Ms. [REDACTED] can be reached at [REDACTED].

[REDACTED], a Verizon customer, has requested a [REDACTED] 1,000 blocks of telephone numbers to meet its dialing plan requirements. This request will allow [REDACTED] to accommodate its rapid growth of branch offices and generally to better support its business needs.

On April 9, 2004 Verizon submitted a Code Request Application Form Part 1A to the PA for the assignment of [REDACTED] 1,000 blocks of numbers necessary to meet the [REDACTED] request. Verizon completed the application in accordance with the Thousands - Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust Certification. A copy of this application is included as Attachment A.

REDACTED

DOCUMENT NUMBER-DATE

05767 MAY 19 04

FRED. COMMISSION CLERK

Verizon submitted the request because Verizon does not have [REDACTED] sequential numbers available within the Tampa Westside central office to meet the [REDACTED] needs. Although the Westside office is in the multi-switch rate center of Tampa, Verizon does not have available numbers in its existing inventory from another switch within the rate center to satisfy the request.

On May 5, 2004, the PA, via the Pooling Administration System (PAS), denied Verizon's request. This decision, provided by the PAS system, is included as Attachment B.

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 the [REDACTED].

Please call Joan Gage on 813-483-2530 if you have any questions.

Sincerely,



David M. Christian  
Vice President  
Regulatory Affairs Florida

Attachments

REDACTED

Part 1 Block Request Form  
 Form Creation date: 04/09/2004  
 Type of Application: NEW

- 1.1 Contact Name: Phone:
- 1.2 NPA: 813 LATA: 952 OCN: 0328  
 Switching Identification: WSSDFLXA87H  
 Locality/City/Wire Center: TAMPACENTR Rate Center: TAMPACEN  
 Homing Tandem Oper Co: VERIZON FLORIDA INC. Tandem CLLI: TAMPFLXA02T  
 Route like NPA: 813 NXX: 875 Block: 4  
 Wire Center Name: WESTSIDE C.O. - 1411  
 Number of Blocks being requested: 3
- 1.3 Date of Application: 04/09/2004 Requested Effective Date: 05/07/2004
- 1.4 Type of Company: LEC  
 Type of service: EOC  
 Code Preference: 813-414-6,7,8  
 Codes Undesirable:
- 1.5 Type of Request: GROWTH  
 Pool Indicator: Y Jeopardy: N Expedite: N

Remarks: GROWTH BLOCK REQUEST IF ASSIGNED 813-414-6,7,8 BLOCKS WILL RETURN TO NATIVE SWITCH

Name of file FTP'd to BACAS: TNT\_CODE\_TXW0000342\_20040409\_103046.dat

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 Historical Usage

10/2003 11/2003 12/2003 01/2004 02/2004 03/2004  
 -2141 -4828 -4633 -1995 -1598 -2031

Forecasted Usage

04/2004 05/2004 06/2004 07/2004 08/2004 09/2004 10/2004 11/2004  
 1738 1738 1738 1738 1738 1738 1738 1738

12/2004 01/2005 02/2005 03/2005  
 1738 1738 1738 1738

Rate Center Statistics

Avg Usage: 1738 MTE: 191.2 Utilization: 71%  
 Total Available: 332258 Total Installed: 1675000 Total Assigned: 1184980

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 Part 1B Data

Activate: X Mod: Info: Intra SP Block Port:  
 LRN: 8138754017 SPID: 0772 NPAC Activate: N  
 Class DPC: 240-255-220 Class SSN: 0 0 0  
 LIDB DPC: 240-255-220 LIDB SSN: 0 0 0  
 CNAM DPC: 240-255-220 CNAM SSN: 0 0 0  
 ISVM DPC: NotSuprtd ISVM SSN: NotSuprtd  
 WSMSC DPC: N/A WSMSC SSN: N/A  
 SOA Origination: N/A

Detail Records

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941-440-0, 1, 2, 3, 4, 5, 6, 7, 8, 9  
•

**Attachment B**

[IMAGE] **Pooling Administration System**

**Dated 05 May 2004**

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

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	<b>Tracking Number</b>
813-TAMPACEN-FL-104669	
	<b>Date of Application</b>
04/30/2004	
	<b>Block Effective Date</b>
	<b>Date of Receipt</b>
04/30/2004	
	<b>Date of Response</b>
05/05/2004	
	<b>Service Provider Name</b>
Verizon	
	(Telcordia™ LERG™ Routing Guide) OCN



0328-VERIZON FLORIDA INC.

NPAC SOA SPID

Pooling Administrator Contact Information :

Gary Zahn

9253638753

9253637688

gary.zahn@neustar.biz

Name

Phone

Fax

E-Mail

Response

—

NPA-NXX-X

0-0-0

Block Assigned

Block Disconnected

Block Contaminated (Yes or No)

null

Block Allocation Date

Switch Identification (Switching Entity / POI)

WSSDFLXA87H

Rate Center

TAMPA CENTRAL

Rate Center Sub Zone

X

**Form Complete, block requested denied**

Explanation :

**DR-3: No documentation to support the State Waiver request was received. Please resubmit your request with documentation supporting the State Waiver.**

—  
**Assignment activity suspended by the administrator**

**Explanation :**

**Further Action**

**Remarks :**

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