

040684-TR

ORIGINAL

June 29, 2004



ORLANDO TELEPHONE COMPANY
4558 S.W. 35TH Street, Suite 100
Orlando, Florida 32811
Phone: 407-996-8900
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COMMISSION
CLERK

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

Re: Orlando Telephone Company Request for Numbers

Dear Ms. Bayo:

In accordance with the expedited process established in order PSC-01-1973-PCO-TL (Docket No. 010782-TL), Orlando Telephone Company (OTC) requests the Florida Public Service Commission to direct the Pooling Administrator (PA) to provide OTC with one uncontaminated 1,000 number blocks for a major hotel business in Orlando, Florida. OTC has a signed contract to provide this Customer's requested service.

OTC considers the customer information in the letter to be confidential. OTC is obligated to protect the identity of the customer as 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). OTC understands the Customer information must be kept confidential. OTC will provide & assist the Commission with the Name and Contact number to reach the customer for confirmation of requirements.

An OTC customer, has requested one 1,000 block of sequential telephone numbers to meet its dialing plan requirements. This request will allow the Customer to accommodate this new property and its rapid growth to support its business needs.

- CMP _____
- COM _____
- CTR _____
- ECR _____
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- MMS _____
- RCA _____
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On June 29, 2004 OTC submitted a Code Request Application Form Part 1A to PA for the assignment of one 1,000 blocks of numbers necessary to meet the customer's request. OTC completed the application in accordance with the Thousands-Block number (NPA-NXX) Pooling Administration Guidelines and completed the necessary Months to Exhaust Certification. A copy of this application is included with this letter.

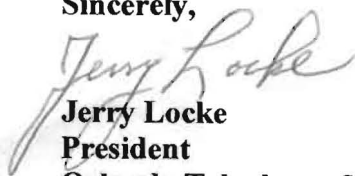
OTC submitted the request in lieu of not being able to provide 1,000 sequential numbers available within the OTC existing central office to meet the Customers requirements. Currently OTC does not have in inventory a block of 1,000 telephone numbers that are non-contaminated. The Customer requires that the number be in sequence to serve business needs.

On June 29, 2004, the PA, via the Pooling Administration System (PAS), denied OTC's request. This decision, provided by the PAS system is included with this letter.

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." Paragraph 64 also indicates, "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of number." The Florida Commission thus has the authority to review the PA's decisions and reverse them when appropriate. OTC seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision due to the system limitations violates the intent and requirements of the FCC in allowing carriers access to numbering resource to meet specific customer demands upon a sufficient showing of need, and the PA's denial of numbering resources interferes with OTC's ability to serve this customer. OTC requests that the Commission instruct the PA to release the numbering resources necessary to meet the requirements of the Customer.

Please call Terry Meade at 407-996-1131 if you have any questions.

Sincerely,



**Jerry Locke
President
Orlando Telephone Company**

Attachments