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August 31, 2004

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

Re: Request for Expedited Review of North American Plan Administration  
("NANPA") Denial of Application for Numbering Resources

**Note: Attachments 1, 2 and 3 to this letter contain Confidential  
Proprietary Business Information**

Dear Ms. Bayo:

AT&T respectfully submits this request for expedited review of the decision by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") to deny AT&T's application for two 1,000 blocks of telephone numbers. AT&T respectfully requests that the Commission specifically direct the PA to immediately release the requested blocks of telephone numbers in the Fort Lauderdale rate center to allow AT&T to serve its customer.

Please note that Attachments 1, 2 and 3 to this letter contain Confidential Proprietary Business Information that should be treated by the Commission as confidential pursuant to Rule 25-22.006(5), Florida Administrative Code. In accordance with Rule 25-22.006(5), also enclosed with this letter are one highlighted copy of the attachments and two redacted copies of the confidential attachments.

This request for review of a NeuStar code denial is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. § 52.15(g)(4) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

An AT&T Florida customer has requested two blocks of 1,000 numbers for its place of business in the Fort Lauderdale rate center.<sup>1</sup> See Attachment 1. AT&T has developed a communications plan that the customer will implement so that all of the 2,000 numbers will be assigned within 180 days of the numbers being made available to the customer. The customer would like to begin using the new numbers as soon as they are available.

The customer's request is for a consecutive block that does not come from blocks 0,6,7,8, or 9, as these blocks would create a conflict with their dialing plan and equipment. The Fort Lauderdale rate center of the 954 Area Code was converted to Number Pooling on January 22, 2001 as authorized by the FCC. Consequently, normal numbering resource acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA<sup>2</sup>.

On August 10, 2004, AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA<sup>3</sup> using the Pooling Administration System ("PAS"). Two thousands-blocks in the Fort Lauderdale rate center were requested. See Attachment 2.

At the completion of this session on PAS, AT&T received, via PAS, an error message indicating the request would not process through the system without a state waiver. The PA, applying the FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources within the rate center will both exhaust within 6.0 months, and meet the 75% utilization level. The error message indicated that the utilization level was not met.

Although AT&T has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving new blocks of numbers, AT&T's existing telephone resources cannot satisfy this customer's specific need. AT&T, however, has identified two lightly contaminated blocks that it is willing to swap for the desired blocks<sup>4</sup>. See Attachment 3. The AT&T blocks that are contaminated each have well below the 10% contamination level required for donation.

AT&T acknowledges the Commission's cooperation with similar "safety valve" requests in the past and appreciates its consideration herein. AT&T respectfully requests that the Commission review the PA's decision expeditiously and order the PA to provide the requested numbers to AT&T in the interest of our customer. AT&T will be unable to

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<sup>1</sup> Attachment 1 is the letter request from the AT&T customer. AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions.

<sup>2</sup> The federal rules in 47 C.F.R 52.15 generalize responsibilities of NANPA and the PA under the heading "Central office code administration".

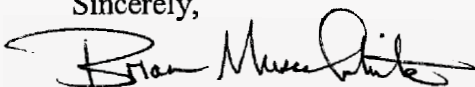
<sup>3</sup> A Copy of the Part 1A and MTE worksheet are appended, which includes the error message. AT&T requests that the Commission treat the information contained as confidential by the Commission.

<sup>4</sup> Attachment 3 contains the two blocks that AT&T is willing to swap as well as the two blocks desired by AT&T's customer. AT&T requests that the Commission treat the information contained as confidential by the Commission.

satisfy the numbering needs of this customer without such an exception. Any correspondence with the PA in this matter may be brought to the attention of the Pooling Administrator who denied the AT&T request:

Mr. Gary Zahn, Pooling Administrator  
NeuStar, Inc.  
1800 Sutter Street, Suite 780  
Concord, CA 94520  
gary.zahn@neustar.com  
(925) 363-8753

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Musselwhite". The signature is fluid and cursive, with a large initial "B" and a distinct "Musselwhite" ending.

Brian Musselwhite