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Nancy B. White
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COMMISSION
CLERK

May 26, 2005

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

**RE: Petition for Expedited Review of Growth Code Denials by
the Number Pooling Administrator for the Jacksonville
exchange (San Marco)**

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 /RN
Nancy B. White

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

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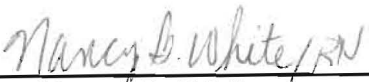
CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials by
the Number Pooling Administrator for the Jacksonville
exchange (San Marco)

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

First Class U.S. Mail this 26th day of May, 2005 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)	Docket No.
Code Denials by the Number Pooling Administrator))	
for the Jacksonville exchange (San Marco))	Filed: May 26, 2005
_____))	

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 Jacksonville exchange. 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

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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 75 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 Cocoa Beach, Daytona Beach, DeLand, Ft. Lauderdale, Gainesville, Hollywood, Jacksonville, Jensen Beach, Keys, Miami, North Dade, Orlando, Palm Coast, Port St. Lucie, Sebastian, St. Johns, 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.

12. The Jacksonville exchange consists of eighteen (18) central offices and eighteen (18) switching entities that utilize numbering resources: Arlington (JCVLFLARDS0), Atlantic (JCBHFLABRS0), Avenues (MNDRFLAVDS0), Beachwood (JCVLFLBWDS0), Clay Street (JCVLFLCLDS0), Ft. Caroline (JCVLFLFCDS0), Ft. George (FTGRFLMARS0), International Airport (JCVLFLIARS0), Lake Forest (JCVLFLLF76E), Loretto (MNDRFLLODS0), Normandy (JCVLFLNODS0), Oceanway (JCVLFLOWDS0), Riverside (JCVLFLRV38E), San Jose (JCVLFLSJ73E), San Marco (JCVLFLSMDS0), San Pablo (JCBHFLSPRS0), Southpoint (JCVLFLJTRS0), and Wesconnett (JCVLFLWCDS0).

13. On May 20, 2005, BellSouth requested additional numbering resources from NeuStar for the San Marco (JCVLFLSMDS0). See Attachment 1. Specifically,

BellSouth requested three (3) 1,000 consecutive number block for a specific customer. The customer requested the format of (904) NXX-1XXX through 3XXX to meet their dialing patterns.

14. At the time of the code request, the Jacksonville exchange had a MTE of 30.207 and a utilization of 76.068%, while the MTE for the San Marco (JCVLFLSMDS0) switch was – 34.30.

15. On May 20, 2005, 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 Jacksonville exchange and the customer contact information for the customer. See Attachment 2.

16. 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).

17. Under earlier MTE 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 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.

18. 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 CLECs, 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.

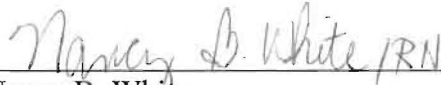
WHEREFORE, BellSouth requests:

1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the Jacksonville exchange; and

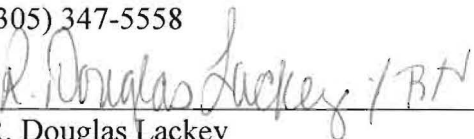
2. The Commission direct NeuStar to provide the requested numbering resources for the Jacksonville exchange as discussed above.

Respectfully submitted this 26th day of May, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

 _____

Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

 _____

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

586908

REDACTED

Pooling Administration System

[REDACTED]@bridge.bellsouth.com (SP)

Sign Out

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **BELLSOUTH SO BELL**

Headquarters Address: [REDACTED]

City: [REDACTED]

State: [REDACTED]

Zip: [REDACTED]

Contact Name [REDACTED]

Contact Address [REDACTED]

City [REDACTED]

Zip [REDACTED]

State [REDACTED]

Telephone [REDACTED]

Fax [REDACTED]

E-mail [REDACTED]@bellsouth.com

Pooling Administrator :

Contact Name **Mr Gary Zahn**

Contact Address **1800 Sutter St. Ste. 780**

City **Concord**

State **CA**

Zip **94520**

Telephone **(925) 363-8753**

Fax **(925) 363-7688**

E-mail **gary.zahn@neustar.biz**

1.2 General Information

LRN Needed **No**

NPA **904**

LATA * **452**

OCN **9417-BELLSOUTH SO BELL**

Parent Company OCN *	9417	City or Wire Center Name	
Number of Thousands-Blocks Requested	3	Rate Center	JACKSONVILLE
Switch Identification (Switching Identity/POI) *	JCVLFLSMDS0	Rate Center Sub Zone	

1.3 Dates

Date of Application **Friday, May 20, 2005**




Requested Block Effective Date | 20 | Jun | 2005

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider * | Incumbent Local Exchange Carrier (ILEC) |

b) Primary type of service Blocks to be used for * | Wireline |

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p>			
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			

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-X 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-X) Pooling Administration Guidelines INC 99-0127-023

Pooling Administration System

bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Friday, May 20, 2005**

OCN **9417**

Company Name **BELLSOUTH SO BELL**

Rate Center **JACKSONVILLE**

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

Name of Block Applicant [REDACTED]
Title [REDACTED]
Telephone Number [REDACTED]
Fax Number [REDACTED]
E-Mail [REDACTED]@bellsouth.com

- A. Available Numbers * [REDACTED]
- B. Assigned Numbers * [REDACTED]
- C. Total Numbering Resources * [REDACTED]
- D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * [REDACTED]

List excluded Code(s) or Block(s)



E. Growth History - Previous 6 months² *

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

F. Forecast - Next 12 months³ *

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

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

[REDACTED]

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	29.891
2	[REDACTED]	30.049
3	[REDACTED]	30.207

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100

76.068

Explanation



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 as 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, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Pooling Administration System

[REDACTED]@bridge.bellsouth.com (SP)

Sign Out

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

You have requested more blocks than you will exhaust in six months.

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

**Jacksonville
Utilization Summary
Report**

Attachment 2

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Jacksonville	Arlington	JCVLFLARDS0	104				
Jacksonville	Atlantic	JCBHFLABRS0	20				
Jacksonville	Avenues	MNDRFLAVDS0	50				
Jacksonville	Beachwood	JCVLFLBWDS0	146				
Jacksonville	Clay Street	JCVLFLCLDS0	290				
Jacksonville	Ft. Caroline	JCVLFLFCDS0	37				
Jacksonville	Ft. George	FTGRFLMARS0	5				
Jacksonville	Int. Airport	JCVLFLIARS0	11				
Jacksonville	Lake Forest	JCVLFLLF76E	58				
Jacksonville	Loretto	MNDRFLLODS0	81				
Jacksonville	Normandy	JCVLFLNODS0	65				
Jacksonville	Oceanway	JCVLFLOWDS0	38				
Jacksonville	Riverside	JCVLFLRV38E	61				
Jacksonville	San Jose	JCVLFLSJ73E	135				
Jacksonville	San Marco	JCVLFLSMDS0	118				
Jacksonville	San Pablo	JCBHFLSPRS0	38				
Jacksonville	Southpoint	JCVLFLJTRS0	64				
Jacksonville	Wesconnett	JCVLFLWCDS0	97				

Customer Contact Information



**Gregg Devlin
Fidelity Information Services
904-854-5584**