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Brian J. Musselwhite
Assistant Vice-President - Florida
Law and Government Affairs
Southern Region
bmusselwhite@att.com

101 N. Monroe Street, Suite 700
Tallahassee, FL 32301
850-425-6313
832-213-0204 (fax)

November 15, 2005

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

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COMMISSION
CLERK

Re: Request for Waiver of Pooling Administrator's Denial of AT&T's Request to NeuStar for 2,000 Numbers to Meet a Specific Customer Need

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

- CMP 1
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH 1 copy records

Dear Ms. Bayo:

AT&T respectfully submits this request for Application of the "safety valve" for NXX-X Acquisition in the state of Florida. By this letter, AT&T requests that the Florida Public Service Commission ("Commission") overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of AT&T's application for two blocks of telephone numbers and that the Commission authorize the PA to release the requested blocks of telephone numbers so that AT&T may serve its customer.

This request is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. 52.15(g)(3)(iv) 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").¹

¹ These guidelines may be found on the INC web site: <http://www.atis.org/inc/docs.asp>

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

A Florida customer of AT&T has requested that AT&T provide a block of 2,000 consecutive numbers for its place of business in the St. Petersburg rate center.² AT&T has developed a communications plan that the customer will implement, and consequently, the customer will assign the 2,000 numbers within 180 days of the numbers being made available by AT&T to the customer's enterprise. The customer would like to begin using the new numbers as soon as they are available.

The customer's request is for 2,000 consecutive numbers in the 2000 and 3000 range to avoid conflict with their existing dial plan configuration. The customer's dial plan is not compatible with a 0 or 9 block. There are currently one hundred thirty-six blocks in the number pool for this rate center, and four combinations of blocks match the customer's need.³

The St. Petersburg rate center of the 727 Area Code began Number Pooling on October 28, 2002. Consequently, normal numbering resource acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA⁴.

On November 7, 2005, 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 PA⁵ using the Pooling Administration System ("PAS"). Two thousands-blocks in the St. Petersburg rate center were requested.

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.⁶ The PA, applying 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 a new block of numbers, AT&T's existing telephone resources cannot satisfy its customer's specific need.

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 overturn the PA's decision in the interest of our customer.

² 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. See Attachment 1, Company-Proprietary customer letter.

³ See Florida 727 NPA STPETERSBG Rate Center: <http://nationalpooling.org/reports/index.htm>

⁴ The federal rules in 47 C.F.R. 52.15 generalize responsibilities of NANPA and the PA under the heading "Central office code administration".

⁵ A copy of the Part 1A and MTE worksheet are appended. AT&T asks the Commission to treat the information contained as confidential by the Commission. See Attachment 2.

⁶ A copy of the error message is appended to the Part 1A and MTE forms. AT&T asks the Commission to treat the information contained as confidential by the Commission. See Attachment 2.

Attachments 1 and 2 to this request contain confidential proprietary business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, AT&T requests that the highlighted information contained in Attachments 1 and 2 be treated by the Commission as confidential and withheld from public inspection. In accordance with Rule 25-22.006, please find enclosed one copy of Attachments 1 and 2 with the confidential information highlighted and two redacted copies.

Thank you for your assistance in this matter.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Brian Musselwhite". The signature is written in a cursive style with a large initial "B" and a long horizontal stroke at the end.

Brian Musselwhite