Manuel A. Gurdian Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

February 14, 2006

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

060136-TL

Petition for the Expedited Review of Growth Code Denials Re: by the Number Pooling Administrator for the St. Johns (Worldgolf), Julington (Lemonwood) and St. Augustine (Main) exchanges

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.

Manuel A. Gurdian

Manuel A. Gurdian

cc: All Parties of Record Jerry D. Hendrix R. Douglas Lackey Nancy B. White

> DOCUMENT NUMBER-DATE 01262 FEB 148

FPSC-COMMISSION CLERK

# **CERTIFICATE OF SERVICE**

Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the St. Johns (Worldgolf), Julington (Lemonwood) and St. Augustine (Main) exchanges

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

First Class U.S. Mail this 14<sup>th</sup> day of February, 2006 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

> Manuel A. Hurdian PN Manuel A. Gurdian

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth	)	Docket No.
Code Denials by the Number Pooling Administration	rator)	
for the St. Johns (Worldgolf), Julington	)	
(Lemonwood) and St. Augustine (Main)	)	Filed: February 14, 2006
exchanges	)	
	)	

## 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 St. Johns, Julington, and St. Augustine exchanges. 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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FPSC-COMMISSION CLERK

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 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, Sanford, Sebastian, St. Johns, Weekiwachee Springs, and West Palm Beach.
- 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. On November 7, 2005, pursuant to issuance of Order No. PSC-05-1123-PAA-TL, the Commission approved BellSouth's proposal to realign its operations in St. Johns County to better provide service to customers in the area that was identified as being the ninth fastest growing county in the country. As part of the proposal, BellSouth has requested 3 full NXXs and 3 blocks to provide the grandfathered services for three (3) years (2 years of continued service and 1 year of intercept). Also, as part of the proposal, BellSouth has requested numbers to provide to customers that select the St. Johns calling scope service. Below are the details of each request for numbering resources.

## St. Johns

- 13. The St. Johns exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: Worldgolf (STAGFLWGRS0).
- 14. On January 27, 2006, BellSouth requested additional numbering resources from NeuStar for the Worldgolf Switch (STAGFLWGRS0). See Attachment 1. Specifically, BellSouth requested one (1) NXX to provide grandfathered services to Green Cove Spring customers and three (3) NXX-Xs to provide numbering resources for customers electing the St. Johns calling scope service from the three transferred areas.
- 15. At the time of the code request, the St. Johns exchange had a MTE of 27.98 and a utilization of 82.17%.
- 16. On January 27, 2006, 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 to complete the proposed realignment. See Attachment 1.

#### St. Augustine

- 17. The St. Augustine exchange consists of three (3) central offices and three (3) switching entities that utilize numbering resources: Beach Side (STAGFLBSRS0), Main (STAGFLMADS0) and Shores (STAGFLSHRS0).
- 18. On January 27, 2006, BellSouth requested additional numbering resources from NeuStar for the Main Switch (STAGFLMADS0). See Attachment 2. Specifically,

BellSouth requested one (1) NXX to provide grandfathered services to Ponte Vedra customers.

- 19. At the time of the code request, the St. Augustine exchange had a MTE of 32.49 and a utilization of 77.30%, while the MTE for the Main switch was 15.14.
- 20. On January 27, 2006, 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 to complete the proposed realignment. See Attachment 2. 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 St. Augustine exchange. See Attachment 3.

# **Julington**

- 21. The Julington exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: Lemonwood (MNDRFLLWRS0).
- 22. On January 27, 2006, BellSouth requested additional numbering resources from NeuStar for the Lemonwood Switch (MNDRFLLWRS0). See Attachment 4. Specifically, BellSouth requested one (1) NXX to provide grandfathered services to the Jacksonville customers.
- 23. At the time of the code request, the Julington exchange had a MTE of 16.11 and a utilization of 84.97%.
- 24. On January 27, 2006, 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 to complete the proposed realignment. See Attachment 4.

- 25. 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).
- 26. 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.
- 27. 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:

- The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the St. Johns, Julington and St. Augustine exchanges; and
- 2. The Commission direct NeuStar to provide the requested numbering resources for the St. Johns, Julington and St. Augustine exchanges as discussed above.

Respectfully submitted this 14th day of February, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

Manuel A. Gurdian

c/o Nancy H. Sims

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

Ŕ. Douglas Lackey

675 West Peachtree Street, Suite 4300

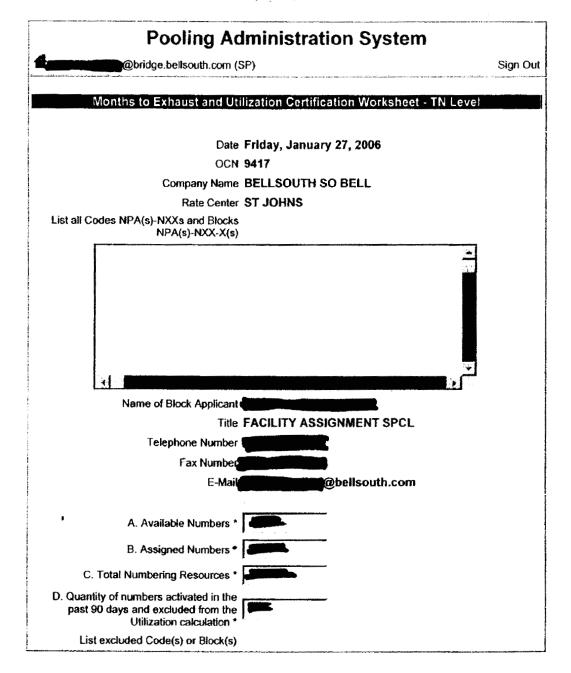
Atlanta, Georgia (404) 335-0747

621888

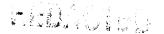
Poo	ling Administration System
@bridge.bell	south.com (SP) Sign Out
	Request Resources
State	FLORIDA 🔻
NPA	904
Rate Center	ST JOHNS -
OCN	9417-BELLSOUTH SO BELL 😛
Type of Application	Application for a full NXX for a Dedicated Customer
	Continue
	ate Center that is moving to a new NPA due to a split, PAS will ne request to the new NPA once the mandatory dialing date

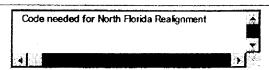
Pooling Admini	stration System
@bridge.bellsouth.com (SP)	Sign Out
Request Full NXX (D	Dedicated Customer)
Do you already have a block/code in this rate center? Yes No	
Will all blocks be activated on the same switch? Yes No	
Will there be multiple block effective dates requested? Yes No	
Con	tinue





F Go	owth History - Previo	is 6 months <sup>2</sup> *		
2. 0.	Month 1		Month 2	
	Month 3		Month 4	
	Month 5		Month 6	
F. Fo	recast - Next 12 mon	hs <sup>3</sup> *		<u> </u>
	Month 1		Month 2	
	Month 3		Month 4	-
	Month 5		Month 6	
	Month 7		Month 8	
	Month 9		Month 10	-
	Month 11		Month 12	
H. Mo (G))	ed by 6)  onths to Exhaust * (Nu  Block R  zation*(Assigned Nu	equested A.  1  nbers (B)) / (Total Num)	signment to customers (A	H. Months to Exhaust 27.975
Exclu	ded Numbers (D)) * 1	00		Vm. 11 &
Explai	nation			





- 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.
- Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
- Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

# **Pooling Administration System**

@bridge.bellsouth.com (SP)

Sign Out

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

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

#### Select One Option and Submit

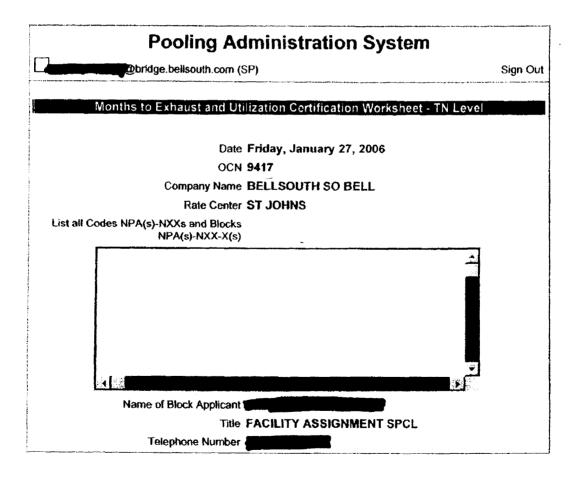
- Return to the Months To Exhaust Form
- C Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

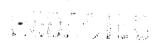
Submit

Pooling Administra	tion System
@bridge.bellsouth.com (SP)	Sign Out
Part 1A	
Type of Application : New	
1.1 Contact Information :	
Note: If any of the co	ntact info is incorrect, edit your user profile.
Block Applicant :	
Company Name BELLSOUTH SO BELL	_
Headquarters Address:	
City:	
State:	
Zip:	
Contact Name	
Contact Address	
City Control of the C	State
Zip <b>Table</b>	•
Telephone Common	Fax
E-mail	n.com
Pooling Administrator :	
Contact Name Mr Gary Zahn	
Contact Address 1800 Sutter St. Ste. 780	
City Concord	State CA
Zip <b>94520</b>	
Telephone (925) 363-8753	Fax <b>(925)</b> 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			
Number of Thousands- Blocks Requested 3			
Switch Identification STAGFLWGR: (Switching Identity/POI)	50	City or Wire Center Name	
Rate Center ST JOHNS		Rate Center Sub Zone	
1.3 Dates			
Date of Application Friday, Janu	Jary 27, 2006		
Requested Block Effective Date	Feb 🔻 2006 😼		
Request Expedited & C Treatment Yes	No		
1.4 Type of Service Provider Reque	sting the Thousand	is-Block	
a) Type of Service Provider * Incumbent Loc	al Exchange Carrier (ILB	C)	3
b) Primary type of service Blocks to be used for *			
c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.			
NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide			
additional block preferences in the event those blocks are not available.			
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any			
3			
e) If requesting a code for LRN purposes, i	ndicate which block(s) e given to the pool)	you will be N/A	

1.5 Type of Request
Initial block for rate center C 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
Continue





	Fax Number	Phallaguth	.com
	E-Mail	<b>D</b> bellsouth	.com
A. Ava	ilable Numbers *	<b>.</b>	
B. Ass	igned Numbers •		
C. Total Numbe	ring Resources *		
D. Quantity of number past 90 days and e		<del></del>	
	ode(s) or Block(s)		
			<b>.</b>
rowth History - Previou	us 6 months <sup>2</sup> *		
Month 1		Month 2	1
Month 3	-	Month 4	-
Month 5		Month 6	
recast - Next 12 mont	ths <sup>3</sup> *		
Month 1		Month 2	-
Month 3	-	Month 4	
Month 5		Month 6	
Month 7		Month 8	
Month 9		Month 10	
Month 11		Month 12	
verage Monthly Foreca ed by 6)	ast (Sum of months # 1-4	6 (Part F above )	



Block Requested A. Available Numbers	H. Months to Exhaust
1	27.975
2	36.449
3	44.924
I. Utilization <sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) • 100	82.172
Explanation	
Blocks needed for North Florida Realignment	
<ol> <li>A copy of this worksheet is required to be submitted to the I requesting additional numbering resources in a rate center. applicant must retain a copy of this document.</li> </ol>	
<ol><li>Net change in TNs no longer available for assignment in ea with the most distant month as Month #1, and Month #6 as</li></ol>	ch previous month, starting
Forecast of TNs needed in each following month, starting w     Month #1.	rith the most recent month as
<ol> <li>To be assigned an additional thousands-block (NXX-X) for must be less than or equal to 6 months. (FCC 00-104,</li></ol>	
<ol> <li>Newly acquired numbers may be excluded from the Utilizati section 52.15 (g)(3)(ii))</li> </ol>	on calculation (FCC 00104,
Continue	

# Pooling Administration System Debridge.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

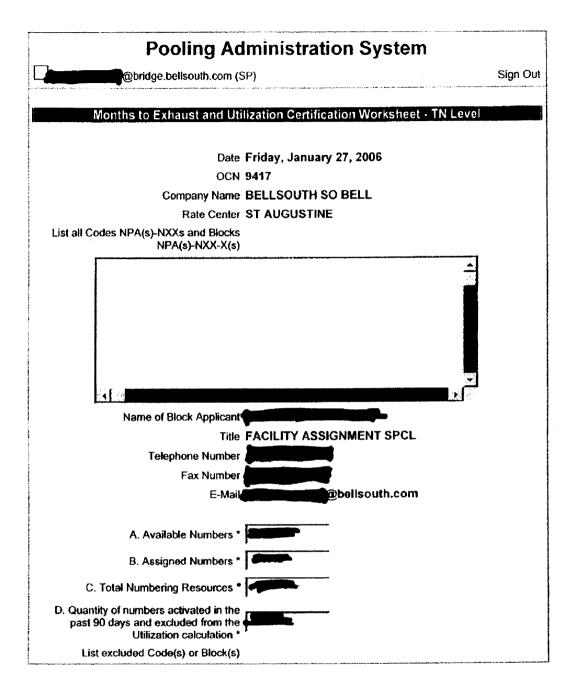


(	~	State Waiver Option	
N. C.		Submit	
		ACRE DEBAT	

Poo	ling Administration System
@bridge.bell	south.com (SP) Sign Out
	Request Resources
***************************************	
State	FLORIDA
NPA	904 🔻
Rate Center	STAUGUSTIN
OCN	9417-BELLSOUTH SO BELL 💌
Type of Application	Application for a full NXX for a Dedicated Customer
	Continue
	ate Center that is moving to a new NPA due to a split, PAS will ne request to the new NPA once the mandatory dialing date

Pooling Administration Syste	m
Dbridge.bellsouth.com (SP)	Sign Out
Request Full NXX (Dedicated Customer)	
Do you deposit hour a blookfoods in this	
Do you already have a block/code in this rate center? Yes No	
Will all blocks be activated on the same switch? Yes No	
Will there be multiple block effective dates  requested? Yes No	
Continue	

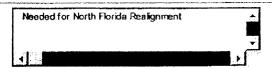




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E. Gro	wth History - Previou	us 6 months²*		
	Month 1		Month 2	
	Month 3		Month 4	
dispersion and any sale	Month 5		Month 6	
F. Fore	cast - Next 12 mont	hs³ *		
	Month 1		Month 2	
	Month 3		Month 4	
	Month 5		Month 6	
	Month 7		Month 8	
	Month 9		Month 10	
	Month 11		Month 12	
ivided	by 6) ths to Exhaust <sup>4</sup> (Nu		signment to customers (/	A) / Average Monthly Forecast
	Block R	equested A.	Available Numbers	H. Months to Exhaust 32.488
Utiliza xclude	etion <sup>5</sup> (Assigned Num ed Numbers (D)) * 10	abers (B)) / (Totał Num 00	bering Resources (C) -	77.302
xplana	ation			





- 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.
- Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
- 5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

# **Pooling Administration System**

@bridge.bellsouth.com (SP)

Sign Out

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

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

#### Select One Option and Submit

- Return to the Months To Exhaust Form
- C Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Submi



# St. Augustine Utilization Summary Report

Exchange	Central Office	Wire Center CLLI	Number Blocks	Avg Growth Per Month	Available TNs	MTE	Utilzation
St. Augustine	Shores	STAGFLSHRS0	21			-	
St. Augustine	Main	STAGFLMADS0	87				
St. Augustine	Beach Side	STAGFLBSRS0	27			<b>'71111</b>	-

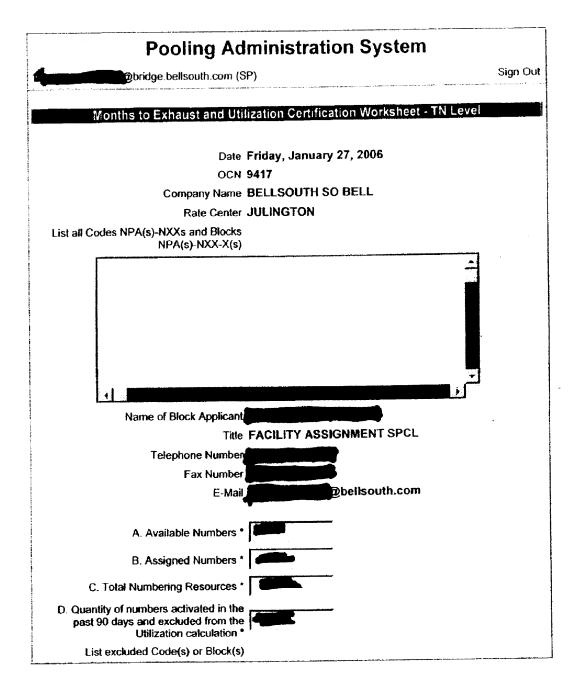
State	FLORIDA
NPA	904
Rate Center	JULINGTON 💌
OCN	9417-BELLSOUTH SO BELL
ype of Application	Application for a full NXX for a Dedicated Customer   •

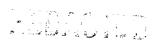
### NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

#### Request Full NXX (Dedicated Customer)

center? Yes No  Will all blocks be activated on the same switch? Yes No  Will there be multiple block effective dates	
Will all blocks be activated on the same switch? Yes No Will there be multiple block effective dates	
switch? Yes No Will there be multiple block effective dates	
Will there be multiple block effective dates	
CG	
requested? Yes No	
Continue	
•	

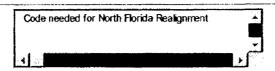




E. Growth	History - Previous 6			
E. Growth	History - Previous 6			V
E. Growth	History - Previous 6			<b>-</b>
E. Growth	History - Previous 6			<b>₩</b>
E. Growth	History - Previous 6			ara III.
		months2 *	1.00	de Zen en e
	Month 1		Month 2	<b>S</b>
	Month 3		Month 4	
	Month 5		Month 6	
Forecas	t - Next 12 months <sup>3</sup>	•		
	Month 1		Month 2	
	Month 3		Month 4	
	Month 5		Month 6	
The state of the s	Month 7		Month 8	
ļ	Month 9		Month 10	
T.	Month 11		Month 12	

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- 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.
- 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, ý 52.15 (g)(3)(iii)).
- 5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

# **Pooling Administration System**

@bridge.bellsouth.com (SP)

Sign Out

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

Based on the information provided, you will not exhaust all blocks in the requested NXX in 6 months.

#### **Select One Option and Submit**

- Return to the Months To Exhaust Form
- C Discard all the information provided for the request and start with a fresh Part 1A
- C State Waiver Option

Submit