



Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

May 10, 2006

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 060385-TL

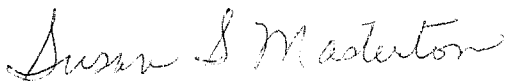
Dear Ms. Bayó:

Enclosed are the original and fifteen copies of Sprint's redacted Petition for expedited Review of NXX-X Code Denial, which we ask that you file in the captioned new docket.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850-599-1560.

Sincerely,


Susan S. Masterton *sah*

Enclosure

DOCUMENT NUMBER: DAT

04125 MAY 10 06

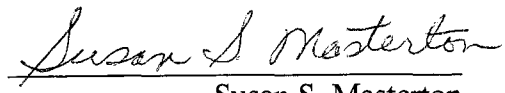
FPSC-COMMISSION CLEF

CERTIFICATE OF SERVICE
DOCKET NO. _____

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S.
Mail this 10th day of May, 2006 to the following:

Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Tom Foley, Relief Planner
Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779-2327



Susan S. Masterton
sk

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth
Code Denials by the North American Numbering
Plan Administration for the Kissimmee Exchange

Docket No. _____
Date Filed: May 10, 2006

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Sprint-Florida, Incorporated ("Sprint"), 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-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's ("NeuStar") denial of Sprint's requests for additional numbering resources in the Kissimmee Exchange. In support of this petition, Sprint states:

PARTIES

1. Sprint is 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 the Industry Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This 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 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.

Commission's efforts to make numbering resources available to carriers, the commission issued Order No. PSC-01-1973-PCO-TL setting forth an expedited code denial process. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

10. The Kissimmee Exchange consists of two (2) central offices and two (2) switching entities that utilize numbering resources: KSSM (KSSMFLXAPSO) and BNVL (KSSMFLXDRSO).
11. On April 25, 2006 Sprint requested additional numbering resources from NeuStar for the Kissimmee exchange. See Attachment 1. Specifically, in order to meet the telephone number needs of one of its customers, Sprint requested a complete NXX in the Kissimmee (KSSMFLXAPSO) wire center. The customer has requested 10,000 numbers. Sprint cannot currently meet this request given the inventory of numbers available at this time in this switch.
12. At the time of the code request, the Kissimmee exchange had a MTE of more than six (6) months and a utilization of 65%. On a switch basis, the Kissimmee Switch (KSSMFLXAPSO) has an MTE of longer than six (6) months and utilization of 77%. There are no blocks of un-assigned numbers large enough to meet the request of this customer in this switch.
13. On May 2, 2006, NeuStar denied Sprint's request for additional numbering resources because Sprint would not exhaust all the blocks within six months, notwithstanding the fact that Sprint's Kissimmee switch does not

have available blocks of numbers in sufficient quantity to meet the customer's requirements. See Attachment 1.

14. Sprint's request for additional numbering resources to meet this customer's requirement in the Kissimmee Exchange would not materially impact exhaustion of available numbers in the 407 area code.
15. As discussed above, both the FCC Order and INC guidelines provided that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 11.1(c).
16. Under earlier 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 and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.
17. Sprint's inability to provide this customer with the requested blocks of numbers prevents Sprint from providing the quality of service this customer desires and expects.
18. This Commission has previously received similar requests from numerous carriers, both ILECs and CLECS in which the carriers have asked the PSC to

overrule a decision of NANPA and NeuStar. The Commission has granted these requests.

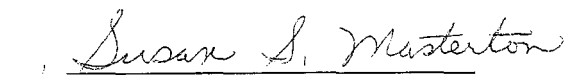
19. Sprint requests that the Commission reverse NeuStar's decision to withhold numbering resources from Sprint on the following grounds:

- (a.) NeuStar's denial of numbering resources to Sprint interferes with Sprint's ability to service its customers within the State of Florida.
- (b.) As a result of NeuStar's denial of Sprint's request for additional numbering resources, Sprint will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, Sprint requests:

- 1. The Commission review the decision of NeuStar to deny Sprint's request for additional numbering resources for the Kissimmee exchange, and
- 2. The Commission directs NeuStar to provide the requested numbering resources for the Kissimmee exchange as discussed above.

Respectfully submitted this 10th day of May, 2006


Susan S. Masterton
Attorney for Sprint
P.O. Box 2214
Tallahassee, FL 32316-2214
850-599-1560

Pooling Administrator's Response/Confirmation Part 3, 407-KISSIMMEE-FL-118137-Po... Page 2 of 2

the disposition of this request, please refer to the Thousands-Block Number (NXX-X)
Pooling Administration Guidelines for the appeals process.

**Assignment activity suspended by the
administrator**

Explanation :

Further Action :

Remarks :

¹This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls.
This must be the CLLITM Location Identification Code of the switching entity/POI shown on the Part
1A form. (Telcordia, LERG Routing Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

Pooling Administrator
Gary Zahn
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone:(925) 363-8753
Fax:(925) 363-7688

Part 3 for tracking id:407-256805 - NANP Administration System

Page 1 of 2

Kincaid, Sharon R [LTD]

From: milton.cruz@NeuStar.com
Sent: Tuesday, May 02, 2006 11:08 AM
To: Kincaid, Sharon R [LTD]; poolingnxxpart3@neustar.biz
Cc: part3@neustar.biz; milton.cruz@NeuStar.com
Subject: Part 3 for tracking id:407-256805

NEUSTAR[®]
Trusted to bring networks together **NANP Administration System**

Dated 02 May 2006

Part 3

Administrator's Response/Confirmation Tracking Number: 407-256805

Date of Application:	<u>04/06/2006</u>	Date of RECEIPT:	<u>04/26/2006</u>
Date of Response:	<u>05/02/2006</u>	Effective Date:	_____
Company/Entity Name:	<u>SPRINT-FLORIDA, INC. DBA UNITED TEL OF FLORIDA</u>	Service Provider OCN:	<u>0341</u>

Code Administrator Contact Information:

<u>Milton Cruz</u>	Phone:	<u>571-434-5348</u>
Signature of Code Administrator		
<u>Milton Cruz</u>	Fax:	<u>571-434-5502</u>
Name (print)	Email:	<u>milton.cruz@neustar.com</u>

 NPA: 407 **Code Assigned:** _____ **Date of NXX Code Assignment:** _____
 Switch Identification(Switch Entity/POI): Rate Center:KISSIMMEE

 Code Reserved: _____ **Date of Reservation:** _____
Your code Reservation will be honored until: _____
Switch Identification (Switch Entity/POI): ..

 Form incomplete
Additional information required in the following sections(s)

 X **Form Complete, code request denied.**
Explanation: _____

 Assignment activity suspended by the administrator.
Explanation: _____

Part 3 for tracking id:407-256805 - NANP Administration System

Page 2 of 2

Further Action: _____

NPA in jeopardy: Yes:___ No:___

If yes, refer to the Section 9 of the assignment guidelines

Remarks:

According to the FCC 2nd Report and Order (FCC 00-429) effective June 30, 2003, in order to receive additional numbering resources, the MTE form you submit must meet the 75% utilization level. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.

Pooling Pass Through. Pooling Tracking # 407-KISSIMMEE-FL-118137

A copy of this Part 3 has been sent to the following users/email addresses.

Block Request Successful!

Pooling Administration System

sharon.kincaid@sprint.com (SP)

Sign Out

Full NXX Single Switch (Confirmation)

You indicated that all blocks you are retaining from the requested NXX will be activated on the same switch and that you will retain the following block (s):

XXX-0, XXX-1, XXX-2, XXX-3, XXX-4, XXX-5, XXX-6, XXX-7, XXX-8, XXX-9

Continue

Cancel

Appendix 3 - Modified August 6, 2001

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1
(Thousands-Block Number Pooling Growth Block Request)**

Date: 5/03/06 OCN: 0341 Company Name: SPRINT

Rate Center: Kissimmee NPA/NXXs only

Name of Block Applicant: SPRINT Signature: _____

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): (321) 697, (407) 343, 518, 846, 847, 870, 931, 932, 933, 935, 943, 944

Title: _____ Telephone No.: _____ FAX No.: _____

E:Mail _____

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: _____
List excluded Code(s) or Block(s): _____

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History – Previous 6 months² [REDACTED]

F. Forecast – Next 12 months³ [REDACTED]

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

H. Months to Exhaust⁴
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{0}$$

I. Utilization⁵
$$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} \times 100 = \underline{77\%}$$

Explanation: [REDACTED] requesting an entire NXX (10,000) numbers. They have a massive project they will be undertaking and would like to secure an entire NXX and be able to assign the numbers out to their agencies as needed. [REDACTED] Please start the appeal process if this request is denied. Contacts are [REDACTED]

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))

Appendix 3 - Modified August 6, 2001

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1
(Thousands-Block Number Pooling Growth Block Request)**

Date: 3/17/06 OCN: 0341 Company Name: SPRINT

Rate Center: Kissimmee

Name of Block Applicant: SPRINT Signature: [Signature]

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): (321) 697, (407) 343, 344, 348, 518, 764, 846, 847, 850, 931, 932, 933, 935, 943, 944, 962

Title: _____ Telephone No.: _____ FAX No.: _____

E-Mail: _____

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: _____
List excluded Code(s) or Block(s): _____

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History – Previous 6 months² [Redacted]

F. Forecast – Next 12 months³ [Redacted]

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

H. Months to Exhaust⁴ $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{0}$

I. Utilization⁵ $\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} \times 100 = \underline{65\%}$

Explanation:

[Redacted] is requesting an entire NXX (10,000) numbers. They have a massive project they will be undertaking and would like to secure an entire NXX and be able to assign the numbers out to their agencies as needed. [Redacted]
[Redacted] Please start the appeal process if this request is denied. Contacts are [Redacted]

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))

MTE

4.25

Pooling Administration System

sharon.kincaid@sprint.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Tuesday, April 25, 2006**

OCN **0341**

Company Name **SPRINT UNITED TEL FL**

Rate Center **KISSIMMEE**

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

407 343-0, 407 343-1, 407 343-2, 407 343-3, 407 343-4, 407 343-5, 407 343-6,
407 343-7, 407 343-8, 407 343-9, 407 344-0, 407 344-1, 407 344-2, 407 344-3,
407 344-4, 407 344-5, 407 344-6, 407 344-7, 407 344-8, 407 344-9, 407 348-0,
407 348-1, 407 348-2, 407 348-3, 407 348-4, 407 348-5, 407 348-6, 407 348-7,
407 348-8, 407 348-9, 407 518-0, 407 518-1, 407 518-2, 407 518-3, 407 518-4,
407 518-5, 407 518-6, 407 518-7, 407 518-8, 407 518-9, 407 764-0,
407 764-1, 407 764-2, 407 764-3, 407 764-4, 407 764-5, 407 764-6,
407 764-7, 407 764-8, 407 764-9, 407 846-0, 407 846-1, 407 846-2, 407 846-3,
407 846-4, 407 846-5, 407 846-6, 407 846-7, 407 846-8, 407 846-9, 407 847-0,
407 847-1, 407 847-2, 407 847-3, 407 847-4, 407 847-5, 407 847-6, 407 847-8,

Name of Block Applicant **Ms sharon r kincaid**

Title **network translation engineer**

Telephone Number **(407) 889-1567**

Fax Number

E-Mail **sharon.kincaid@sprint.com**

A. Available Numbers *

B. Assigned Numbers *

C. Total Numbering Resources *

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation

List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months² *

Month 1	<input type="text" value=""/>	Month 2	<input type="text" value=""/>
Month 3	<input type="text" value=""/>	Month 4	<input type="text" value=""/>
Month 5	<input type="text" value=""/>	Month 6	<input type="text" value=""/>

MTE

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]	0.000

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

N/A

Explanation

[REDACTED] is requesting an entire NXX (10,000) number. They have a massive project they will undertake and would like to secure an entire

¹A 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.

²Net 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.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To 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)).

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

Show Calculations Continue Cancel