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Legal Department

Manuel A. Gurdian
Attorney

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

COMMISSION
CLERK

October 18, 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

Re: Docket No.: 060687-TL
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the Sanford
exchange (Lake Mary-3)

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,

Manuel A. Gurdian (SAG)
Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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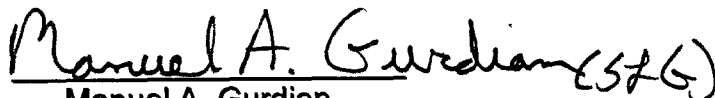
CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator for the
Sanford exchange (Lake Mary-3)

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

First Class U.S. Mail this 18th day of October, 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. Gurdian
Manuel A. Gurdian

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the Sanford exchange (Lake Mary-3))
_____)

Docket No. 060687-TL

Filed: October 18, 2006

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 requests for additional numbering resources in the Sanford 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. The Sanford exchange consists of two (2) central offices and two (2) switching entities that utilize numbering resources: Lake Mary (LKMRFLHEDS0) and Main (SNFRFLMADS0).

5. On October 12, 2006, BellSouth requested additional numbering resources from NeuStar for the Lake Mary (LKMRFLHEDS0) switch. See Attachment 1. Specifically, BellSouth requested a block to provide 200 numbers to meet a customer's request. The customer has requested that the numbers be NPA NXX-2, 4, or 5.

6. At the time of the code request, the Sanford exchange had a MTE of 37.28 and a utilization of 82.37%, while the Lake Mary (LKMRFLHEDS0) switch had a MTE of 14.36.

7. On October 12, 2006, NeuStar's automated number request system denied BellSouth's request for additional numbering resources because BellSouth had not met the months-to-exhaust 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 customer contact information. See Attachment 2.

8. 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).

9. 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.

10. 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.

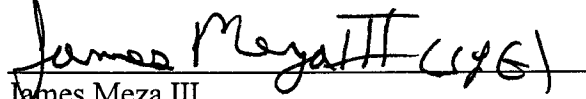
(c) As a result of NeuStar's denial of BellSouth's request for additional numbering resources, BellSouth will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, BellSouth requests:

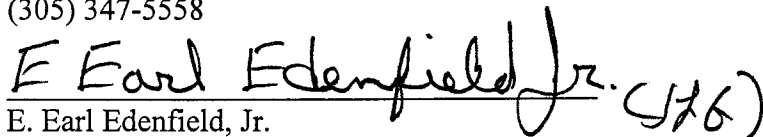
1. The Commission review the decision of NeuStar to deny BellSouth's request for additional numbering resources for the Sanford exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Sanford exchange as discussed above.

Respectfully submitted this 18th day of October, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

James Meza III

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

E. Earl Edenfield, Jr.
E. Earl Edenfield, Jr.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763

REDACTED

Attachment 1

Pooling Administration System

delores a pearson@bridge.bellsouth.com (SP) Sign Out

Request Resources

State

NPA

Rate Center

OCN

Type of Application

Quantity of Blocks Requested

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 **Ms Dara Sodano**

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

City **Concord**

Zip **94520**

State **CA**

Telephone **(925) 363-8730**

Fax **(925) 363-7697**

E-mail **dara.sodano@neustar.biz**

1.2 General Information

LRN Needed No
NPA 407 LATA
OCN # 9417-BELLSOUTH SO BELL
Parent Company OCN
Number of Thousands-Blocks Requested
Switch Identification (Switching Identity/POI) # City or Wire Center Name
Rate Center Rate Center Sub Zone

1.3 Dates

Date of Application
Requested Block Effective Date
Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider
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.](#)

<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>		
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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 (ATIS-0300066)

Pooling Administration System	
@bridge.bellsouth.com (SP)	Sign Out
Months to Exhaust and Utilization Certification Worksheet - TN Level	
<p>Date Thursday, October 12, 2006 OCN 9417 Company Name BELLSOUTH SO BELL Rate Center SANFORD</p> <p>List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)</p> <div style="border: 1px solid black; height: 150px; width: 100%; margin-top: 10px;"></div>	

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]	37.278

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **82.373**

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

Sanford
Utilization Summary
Report

Attachment 2

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Sanford	Lake Mary	LKMRFLHEDS0	[REDACTED]				
Sanford	Main	SNFRFLMADS0	[REDACTED]				

Customer Contact Information

[REDACTED]