

REDACTED

ORIGINAL



at&t

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June 29, 2007

Mrs. Ann Cole
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

070392-TX

Re: Request for Waiver of Pooling Administrator's Denial of AT&T's Request to NeuStar for 20 Numbers to Meet a Specific Customer Need

Dear Ms. Cole:

AT&T respectfully submits this request for application of a "safety valve" for NPA-NXX-X acquisition in the state of Florida. 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 a block of telephone numbers and that the Commission authorize the PA to release the requested block so that AT&T may serve its customer.

CMP 1

COM This request is based on the Federal Communications Commission ("FCC") Rules at 47
CTR C.F.R. 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling
ECR Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment
Guidelines published by the Industry Numbering Committee ("INC").¹

GCL A Florida customer has requested that AT&T provide 20 numbers for its business in the
OPC Winter Park rate center.² AT&T has developed a plan that the customer will implement and
RCA thus assign the numbers within 180 days of the numbers being made available to the
SCR enterprise. The customer's request is for 20 numbers in any NPA-NXX (321-NXX-2XXX or

SGA ¹ These guidelines may be found on the INC web site: <http://www.atis.org/inc/docs.asp>
SEC 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 of Company-
OTH Proprietary customer letter.

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FPSC-COMMISSION CLERK

407-NXX-2XXX) but must be 2100-2119 for compatibility with their existing internal dial plan. There are currently 62 blocks in the Winter Park pool, consisting of NPAs 321 and 407. There are 5 non-contaminated 2 blocks that would satisfy the customer's need.³

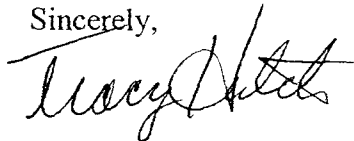
The Winter Park rate center of the 321/407 area code began number pooling in May 2002. Consequently, numbering resource acquisition by a pooling carrier is attained by interfacing with the PA⁴. On June 26, 2007, AT&T submitted a "Thousand Block Application Form Part 1A" and a "Month-to-Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA⁵ via the Pooling Administration System ("PAS"). One thousands block, in the Winter Park rate center, was requested. AT&T received an error message indicating the request would not process through the system without a waiver.⁶ The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources will exhaust within 6.0 months, AND meet the 75% utilization level. The error message indicated that neither threshold was 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. The name, address and telephone number of the AT&T customer to whom requests for verification may be addressed is included in Attachment 3.

Attachments 1, 2 and 3 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, 2 and 3 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 (850) 425-6360.

Sincerely,



Tracy Hatch

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.

ATTACHMENT 1

(REDACTED)

June 25, 2007

AT&T Number Administration/Code Administration,

This Letter of Intent, is for [redacted] for Dial Plan Purposes programmed in their equipment purchased and installed by [redacted] agrees to activate the numbers requested within 180 days from [redacted] receipt of the requested numbers. [redacted] intends to order service using these numbers immediately after required testing is performed by [redacted] This service will be provided in the [redacted]

Please indicate restricted blocks, citing the reason (e.g., PBX limitation, dial plan conflict)

x Block 1 (1000-1999) Technical Restriction: [redacted]

_ Block 2 (2000-2999) Technical Restriction: [redacted]

x Block 3 (3000-3999) Technical Restriction: [redacted]

x Block 4 (4000-4999) Technical Restriction: [redacted]

x Block 5 (5000-5999) Technical Restriction: [redacted]

x Block 6 (6000-6999) Technical Restriction: [redacted]

X Block 7 (7000-7999) Technical Restriction: [redacted]

x Block 8 (8000-8999) Technical Restriction: [redacted]

x Block 9 (9000-9999) Technical Restriction: [redacted]

[REDACTED] engages in the [REDACTED]

[REDACTED] The company offers locks, such as cylindrical, mortise, deadbolt, and related supplies, as well as door closers, exit devices and related accessories. These products are used in retrofit and in new building projects, and in the maintenance and repair of structures. It also provides various parts and equipment such as key cutting tools. [REDACTED] company offers its products to customers in construction market, including general contract hardware houses, security integrators, locksmiths, and glass contractors, as well as in manufacturing market, which includes original equipment manufacturers. [REDACTED] company is an Authorized Wholesale Distributor for more than 40 manufactures of commercial door hardware and related construction building supplies.

[REDACTED]

numbers from the bank of numbers we are requesting now.

Sincerely, [REDACTED]

||
||
||
||

ATTACHMENT 2

(REDACTED)

Pooling Administration System

iloper (SP)

Sign Out

Request Resources

State

NPA

Rate Center

OCN

Type of Application

Quantity of Blocks Requested



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.

Pooling Administration System

flloper (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

Headquarters Address:

City:

State:

Zip:

Contact Name

Contact Address

City:

Zip:

Telephone (

E-mail :

State [REDACTED]

Fax [REDACTED]

Pooling Administrator ⁱⁱ:

Contact Name Ms Dara Sodano

Contact Address 1800 Sutter St. Ste. 780

City Concord

Zip 94520

Telephone (925) 363-8730

E-mail dara.sodano@neustar.biz

State CA

Fax (925) 363-7697

1.2 General Information

LRN Needed [REDACTED]

NPA [REDACTED]

LATA [REDACTED]

OCN ^{iv} [REDACTED]

Parent Company OCN *

Number of Thousands-Blocks Requested [REDACTED]

Switch Identification (Switching Identity/POI) ^{v*} [REDACTED]

Rate Center ^{vi} [REDACTED]

City or Wire Center Name [REDACTED]

Rate Center Sub Zone [REDACTED]

1.3 Dates

Date of Application ^{vii} [REDACTED]			
Requested Block Effective Date ^{viii} [REDACTED]			
Request Expedited Treatment [REDACTED]			
1.4 Type of Service Provider Requesting the Thousands-Block			
a) Type of Service Provider * [REDACTED]			
b) Primary type of service Blocks to be used for * [REDACTED]			
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			
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 Growth block for rate center Change block Disconnect block			
Remarks			

Pooling Administration System

lloper (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date

OCN

Company Name

Rate Center

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

Name of Block Applicant **Ms Lisa A Loper**

Title **Assistant Manager**

Telephone Number **(908) 234-7622**

Fax Number **(908) 234-8044**

E-Mail **lloper@att.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			Month 2		
Month 3			Month 4		
Month 5			Month 6		

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 Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested [REDACTED]

A. Available Numbers [REDACTED]

H. Months to Exhaust [REDACTED]

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

Explanation

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))

[REDACTED]

Pooling Administration System

Operator (SP)

Sign Out

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

Your utilization calculates to [REDACTED] The FCC requires a utilization of [REDACTED]

Select One Option and Submit

[REDACTED] Return to the Months To Exhaust Form

[REDACTED] Discard all the information provided for the request and start with a fresh Part 1A

[REDACTED] State Waiver Option



ATTACHMENT 3

Customer Name: [REDACTED]

Address: [REDACTED]
[REDACTED]

Telephone: [REDACTED]