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Room 400
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ORIGINAL

July 9, 2007

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

070404-TP

**Re: Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Daytona Beach exchange (Main)**

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth
Telecommunications, Inc. d/b/a AT&T Florida'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

Manuel A. Gurdian

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

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

DOCUMENT NUMBER-DATE

05742 JUL-9 07

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Daytona Beach exchange (Main)

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

First Class U.S. Mail this 9th day of July, 2007 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denials by the Number Pooling Administrator)
for the Daytona Beach exchange (Main)) Filed: July 9, 2007

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), 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 AT&T Florida's request for additional numbering resources in the Daytona Beach exchange. In support of this petition, AT&T Florida states:

PARTIES

1. AT&T Florida 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

DOCUMENT NUMBER-DATE
05742 JUL-95
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. The Daytona Beach exchange consists of five (5) central offices and five (5) switching entities that utilize numbering resources: Fentress (DYBHFLFNRS0), Main (DYBHFLMADS0), Ocean Shores (DYBHFLOSRS0), Ormand Beach (DYBHFLOBDS0) and Port Orange (DYBHFLPODS0).

5. On July 3, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Daytona Beach Main (DYBHFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested one block to meet the request of a specific customer for 1000 consecutive numbers in the format of NPA NXX-2-7.

6. At the time of the code request, the Daytona Beach exchange had a MTE of 42.62 and a utilization of 72.20%, while the Main (DYBHFLMADS0) switch had a MTE of 54.71.

7. On July 3, 2007, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida 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 MTE and utilization rate for each switch in the Daytona Beach exchange and the customer's 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. AT&T Florida requests that the Commission reverse NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NeuStar's denial of numbering resources to AT&T Florida interferes with AT&T Florida'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 FCC's rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida 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 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.

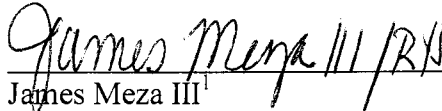
(c) As a result of NeuStar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, AT&T Florida requests:

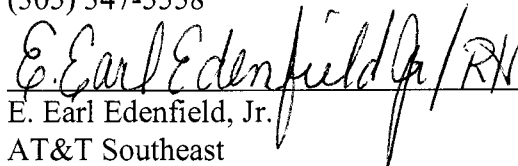
1. The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the Daytona Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Daytona Beach exchange as discussed above.

Respectfully submitted this 9th day of July, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA



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(305) 347-5558



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

683691

¹ The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

REDACTED

Attachment 1


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Pooling Administration System

[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 **BELLSOUTH SO BELL**

Headquarters Address: [REDACTED]

City [REDACTED]

State [REDACTED]

Zip [REDACTED]

Contact Name [REDACTED]

Contact Address [REDACTED]

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- Disconnect
- Block Transfer
- Confirm Block(s) in S
- Search Forms
- Submit Forecast
- Create/Modify Fo
- User Profile
- Donate Blocks

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Submit Forecast

- Submit Forecast

Create/Modify Fo

- Create/Modify Fo

User Profile

- User Profile

Unmute Block

- Unmute Block

City [REDACTED] State [REDACTED]
Zip [REDACTED]
Telephone [REDACTED] Fax [REDACTED]
E-mail [REDACTED]@bellsouth.com

Pooling Administrator II:
Contact Name Ms Dara Sodano
Contact Address 1800 Sutter St. Ste. 780
City Concord State CA
Zip 94520
Telephone (925) 363-8730 Fax (925) 363-7697
E-mail dara.sodano@neustar.biz

1.2 General Information

LRN Needed No
NPA 306 LATA * 456

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BELL

Parent Company OCN * 9417

Number of Thousands-Blocks Requested 1

Switch Identification (Switching Identity PO) ** OYBHFLMADS0

City or Wire Center Name

Rate Center Sub Zone

Rate Center vi DAYTONA BEACH

1.3 Dates

Date of Application vi Tuesday, July 3, 2007

Requested Block Effective Date vii 3 Aug 2007

Request Expedited Treatment Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

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a) Type of Service Provider * Incumbent Local Exchange Carrier (ILEC)

b) Primary type of service Blocks to be used for * Wireline

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)

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- Transfer Block

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Type of Request

Initial block for rate center Yes

Growth block for rate center Yes

Change block N:A

Disconnect block N:A

Remarks NO 0, 1, 8 OR 9 1ST NBR LAST 4 DIGITS

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-0300086)

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Pooling Administration System

@bridge.bellsouth.com (SP)

Months to Exhaust and Utilization Certification Worksheet: IN Level

Date Tuesday, July 3, 2007
OCN 9417
Company Name BELLSOUTH SO BELL
Rate Center DAYTONA BEACH

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

- Request For Resource
- Modify
- Disconnect
- Block Transfer
- Confirm Block(s) in S
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javascript:clickOnNode("1")

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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) [REDACTED]

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Growth History - Previous 6 months²

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

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]

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Month 9	Month 10	Month 11	Month 12
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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

Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A Available Numbers	# Months to Exhaust
1	[REDACTED]	42.620

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

72.201

Explanation

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@bridge.bellsouth.com (SP) Sign Out

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

Your utilization calculates to 72.201 percent. The FCC requires a utilization of 75.000 percent.

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

Submit Cancel

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Internet

Daytona Beach
Utilization Summary
Report

Attachment 2

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Exchange	Central Office	Wire Center CLLI	Blocks	Avg Growth Per Month	Available TNs	MTE
Daytona Beach	Fentress	DYBHFLNRS0	9			
Daytona Beach	Main	DYBHFLMADS0	133			
Daytona Beach	Ocean Shores	DYBHFLOSRS0	11			
Daytona Beach	Ormond Beach	DYBHFLOBDS0	62			
Daytona Beach	Port Orange	DYBHFLPODS0	79			

Customer Contact Information

[REDACTED]