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070406-TP

July 10, 2007

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

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Re: Request for Waiver of Pooling Administrator's Denial of Verizon  
Wireless' Request for a Thousands-Block From a New NXX Code  
to Replenish the Bradenton, FL Pool

Dear Ms. Cole:

Please find enclosed the above-referenced filing on behalf of Verizon Wireless.  
Please note that Attachment 1 to the filing contains confidential and proprietary business  
information. Pursuant to rule 25-22.006(5), Florida Administrative Code, Verizon  
Wireless requests that the highlighted information contained in Attachment 1 be treated  
by the Commission as confidential and withheld from public inspection. In accordance  
with the rule, please find enclosed one copy of Attachment 1 with the confidential  
information highlighted, and two redacted copies.

Should you have any questions about this filing, please give me a call.

Sincerely,

Donna E. Blanton

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cc: Dana Crandall  
Lolita Forbes

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05786 JUL 10 06

FPSC-COMMISSION CLERK

ORIGINAL



July 9, 2007

ORIGINAL

Verizon Wireless  
Numbering Policy & Standards  
500 West Dove Road  
Southlake, TX 76092

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

RE: Request for Waiver of Pooling Administrator's Denial of Verizon Wireless' Request for A Thousands-Block From a New NXX Code To Replenish the Bradenton, FL Pool

Dear Ms. Cole:

Verizon Wireless respectfully submits this request for application of a "safety valve waiver"<sup>1</sup> for thousands-block acquisition in the state of Florida. By this letter, Verizon Wireless requests that the Florida Public Service Commission ("Commission"):

- 1) Overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of Verizon Wireless' application for a thousands-block of telephone numbers from a new NXX code;
- 2) Authorize the PA to assign the requested thousands-block from a new NXX code so that Verizon Wireless may utilize the thousands-block in the testing and commissioning of a new switch; and
- 3) Direct the PA to make the remaining nine thousands-blocks from the new NXX code unavailable for assignment until Verizon Wireless notifies the PA that such thousands-blocks are viable for assignment.

This request is based on the FCC Rules at 47 C.F.R. 52.15(g)(3)(iv)<sup>2</sup> and pursuant to the Thousands-Block (NXX-X) Number Pooling Administration Guidelines ("Pooling Guidelines") and the Central Office Code Assignment Guidelines ("CO Code Guidelines") published by the Alliance for Telecommunications Industry Solutions' Industry Numbering Committee ("ATIS INC")<sup>3</sup>. On July 2, 2007, Verizon Wireless submitted an application to the PA for a thousands-block from a new NXX code (via a request to the PA to "replenish the pool") in the Bradenton rate center. Verizon Wireless met the Pooling Guidelines requirements for a growth thousands-block<sup>4</sup>, but the PA immediately denied the request to replenish the pool because there was an adequate quantity of thousands-blocks in the Bradenton pool such that a new NXX code did not need to be opened<sup>5</sup>.

Verizon Wireless will install a new mobile switch on November 9, 2007 in the Bradenton area to accommodate the tremendous customer growth Verizon Wireless has experienced in Florida. In installing a new switch, Verizon Wireless must engage in extensive testing with the equipment vendor

<sup>1</sup> Pursuant to Federal Communications Commission ("FCC") Order 01-362, released December 28, 2001, in which the FCC delegated authority to state commissions "to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denies a specific request for numbering resources". See 01-362, ¶ 61.

<sup>2</sup> The federal rules in 47 C.F.R. 52.15 generalize responsibilities of North American Numbering Plan Administration ("NANPA") and the PA under the heading "central office code administration".

<sup>3</sup> These guidelines are located on the ATIS INC website: <http://www.atis.org/inc/docs.asp>.

<sup>4</sup> A copy of Verizon Wireless' Part 1A and months-to-exhaust worksheet are appended. See Attachment 1.

<sup>5</sup> A copy of the PA's Part 3 denial is appended. See Attachment 2.

DOCUMENT NUMBER-DATE

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Page 1 of 3

FPSC-COMMISSION CLERK

and the interconnecting tandem owner before adding any customers to the switch. The testing and "turn-up" process requires Verizon Wireless to be the code holder of a new NXX code so that it can establish multiple test numbers in the new switch before the switch becomes "live". Being assigned a thousands-block from a new NXX code for which Verizon Wireless is the code holder, and having no customers in that new NXX code is essential for testing Emergency E9-1-1 capability, CALEA ("Communications Assistance for Law Enforcement Act") and wiretapping capabilities, as well as other homeland security and law enforcement requirements. In addition, being the code holder of a new NXX code will facilitate testing of routine but indispensable network functionalities for the provisioning of roaming, long distance, and virtually every conceivable mobile-to-land, mobile-to-mobile and land-to-mobile calling scenario. Once this extensive testing is complete and the switch is "live", Verizon Wireless will retain the designation of a single network test number for publication in the LERG Routing Guide, and will use the remaining 999 numbers for customer growth.

Verizon Wireless must be the code holder of a new NXX for testing purposes, but the Pooling Guidelines do not allow the PA to assign a thousands-block from a new NXX code for general testing purposes; the PA can only approve an application for a thousands-block from a new NXX code if the NXX code (assigned by the NANPA) is going to be used for location routing number (LRN) purposes, a dedicated customer, or if the pool needs to be replenished. Verizon Wireless does not meet these scenarios, but its need to be the code holder of a new NXX code is bona fide. Verizon Wireless will utilize a number from an existing NXX code in Bradenton to establish an LRN for the new switch once the switch is installed and that existing NXX code is migrated to it. Verizon Wireless cannot use numbers from that existing NXX code for testing the new switch because there are already live customers within the existing NXX code.

If this Commission grants Verizon Wireless' request that the Commission overturn the PA's decision to deny Verizon Wireless' request for a thousands-block from a new NXX code and the Commission authorizes the PA to assign to Verizon Wireless the requested thousands-block from a new NXX code, Verizon Wireless also requests that the Commission direct the PA to make the remaining nine thousands-blocks unavailable for assignment to other service providers until Verizon Wireless confirms to the PA that the switch installation is complete and the thousands-blocks are viable<sup>6</sup>. Such direction is necessary to prevent the PA from assigning one of those thousands-blocks to another service provider in the interim (prior to November 9, 2007), and Verizon Wireless wants to ensure that no service provider requests a thousands-block that won't be viable for several months during Verizon Wireless' new switch testing process, particularly when there are other viable thousands-blocks in the pool.

If this Commission grants Verizon Wireless' requests and Verizon Wireless is assigned the requested thousands-block from a new NXX code no later than July 25, 2007, the LERG effective date of the new NXX code and thousands-block should be near the end of September 2007. That will give Verizon Wireless only six weeks to complete testing before turn-up of the new switch on November 9, 2007. Verizon Wireless will notify the PA as soon as the switch installation is complete and the switch is "live" so that the PA can make the remaining nine thousands-blocks available for assignment. Verizon Wireless anticipates that it will be able to notify the PA no later than November 12, 2007 that such thousands-blocks can be made available for assignment.

Attachment 1 to this request contains confidential and proprietary business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, Verizon Wireless requests that the highlighted information contained in Attachment 1 is treated by the Commission as confidential and withheld from

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<sup>6</sup> Per section 4.2.1 of the Pooling Guidelines, the code holder or "LERG Assignee" of an NXX code is responsible for default routing functions associated with a pooled NXX Code. Verizon Wireless cannot fulfill its LERG Assignee responsibilities for the remaining nine thousands-blocks until the switch is "live".

public inspection. In accordance with Rule 25-22.006, please find enclosed one copy of Attachment 1 with the confidential information highlighted, and two redacted copies.

For the above reasons, Verizon Wireless respectfully requests that the Commission:

- 1) Overturn the PA's denial of Verizon Wireless' application for a thousands-block from a new NXX code;
- 2) Authorize the PA to assign the requested thousands-block from a new NXX code so that Verizon Wireless may install of a new switch to meet growing customer demand; and
- 3) Direct the PA to make the remaining nine thousands-blocks from the new NXX code unavailable for assignment until Verizon Wireless notifies the PA that such thousands-blocks are viable.

Should Verizon Wireless encounter any issues with its switch installation and turn-up that might delay the viability of the remaining thousands-blocks by November 12, Verizon Wireless will notify the PA immediately and provide a new expected viability date. In no instance though shall a revised date be pushed out beyond March 2008 when the NXX code and Verizon Wireless' thousands-block must be in service.

Thank you for you assistance in this matter. If you have any questions, please feel free to contact me at 682-831-3364.

Sincerely,

Dana Crandall  
Member of Technical Staff  
Numbering Policy & Standards

Attachments: 1 and 2


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- Request For Resources
- Confirm Block(s) in Service (Part 4)
- Search Forms
  - Add New Form
  - List Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports

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## Pooling Administration System

melissa.unger@verizonwireless.com (SP) Sign Out

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**Part 1A**

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**Type of Application<sup>i</sup>: New**  
**Tracking Number : 941-BRADENTON-FL-131975**

---

**1.1 Contact Information :**

*Note: If any of the contact info is incorrect, edit your user profile.*

**Block Applicant :**

Company Name VERIZON WIRELESS-FL  
Headquarters Address 2785 Mitchell Drive, MS8-1  
City Walnut Creek  
State CA  
Zip 94598

Contact Name Melissa S Unger  
Contact Address 8921 Research Drive  
City Charlotte  
Zip 29729  
Telephone (704) 510-6016  
E-mail melissa.unger@verizonwireless.com

State NC  
Fax (704) 510-6090

**Pooling Administrator<sup>ii</sup>:**

Contact Name 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<sup>iii</sup> NO  
NPA 941  
OCN<sup>iv</sup> 6502 - VERIZON WIRELESS-FL  
Parent Company OCN  
Number of Thousands-Blocks Requested 0  
Switch Identification (Switching Identity/POI)<sup>v</sup>  
Rate Center<sup>vi/sup></sup> BRADENTON

LATA  
City or Wire Center Name  
Rate Center Sub Zone

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Done

start Sherry Slush-Mal... ETNI - Microsoft... NMS Functions... June Pooling Administr... Microsoft Excel... 10:49 AM

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**NEPSTAR**

- Request for Resources
- Confirm Block(s) in Service (Part 4)
- Search Forms
- List Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports


<p>1.2 General Information</p> <p>LRN Needed: NO          NPA: 941          OCN: 6502 - VERIZON WIRELESS-FL          Parent Company OCN:          Number of Thousands-Blocks Requested: 0          Switch Identification (Switching Identity/PO):          Rate Center: <sup>Wisp</sup>BRADENTON          City or Wire Center Name:          Rate Center Sub Zone:          LATA:</p>	
<p>1.3 Dates</p> <p>Date of Application: 07/02/2007          Requested Block Effective Date: 08/02/2007          Request Expedited Treatment: N</p>	
<p>1.4 Type of Service Provider Requesting the Thousands-Block</p> <p>a) Type of Service Provider          b) Primary type of service blocks to be used for          c) Thousands-Block(s) (NPA-NXX-X) assignment preference 941-xxx-9          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 941-xxx-9 the blocks will be given to the pool)</p>	
<p>1.5 Type of Request</p> <p>Initial block for rate center          Growth block for rate center: Yes          Change block          Disconnect block          Remarks</p>	
<p>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)</p> <p style="text-align: right;"> <input type="button" value="Back"/> <input type="button" value="Print"/> </p>	

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mellissa.unger@verizonwireless.com (SP)

**Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>**

Block Applicant:

Name of Block Applicant **Melissa S Unger**  
 Title **Network - Analyst**  
 Telephone Number **(704) 510-6016**  
 Fax Number **(704) 510-6090**  
 E-Mail **mellissa.unger@verizonwireless.com**  
 Date **07/02/2007**  
 OCN **6502**  
 Rate Center **BRADENTON**

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

941 201 0,2,9; 941 209 0,1,9; 941 224 0-9; 941 465 0,1,8,9; 941 773 0-9; 941 779 3,4,5,6,8; 941 932 0,1,2,3,5,6,7

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)

941-201-2

E. Growth History - Previous 6 months<sup>2</sup>

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

F. Forecast - Next 12 months<sup>3</sup>

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)<sup>4</sup> [REDACTED]

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D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation **1000**  
List excluded Code(s) or Block(s)  
941-201-2

E. Growth History - Previous 6 months<sup>2</sup>

Month 1		Month 2	
Month 3		Month 4	
Month 5		Month 6	

F. Forecast - Next 12 months<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	

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>4</sup>  
[Redacted]

H. Months to Exhaust (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1		

I. Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
[Redacted]

Explanation

<sup>1</sup>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.

<sup>2</sup>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.

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

<sup>4</sup>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)).

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

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## Pooling Administration System

[melissa.unger@verizonwireless.com \(SP\)](mailto:melissa.unger@verizonwireless.com)

[Sign Out](#)

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**Thousands-Block Application Form  
Part 1B**

**Tracking Number 941-BRADENTON-FL-131975**

**Activation Request**

**For Information Only**

**Section A :**  
 (If request is for Activation, the thousand-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/ donating switch information; the PA will fill in those three fields. For a Modification request, the requestor is to provide all information.)

**Pooling Administrator :**

Contact Name <b>Dara Sodano</b>	
Contact Address <b>1800 Sutter St. Ste. 780</b>	
City <b>Concord</b>	State <b>CA</b>
Zip <b>94520</b>	
Telephone <b>(925) 363-8730</b>	Fax <b>(925) 363-7697</b>
E-mail <b>dara.sodano@neustar.biz</b>	

**Block Applicant :**

Company Name <b>VERIZON WIRELESS-FL</b>	
Contact Name <b>Melissa S Unger</b>	
Contact Address <b>8921 Research Drive</b>	
City <b>Charlotte</b>	State <b>NC</b>
Zip <b>29729</b>	
Telephone <b>(704) 510-6016</b>	Fax <b>(704) 510-6090</b>
E-mail <b>melissa.unger@verizonwireless.com</b>	

---

Service Provider NPAC SOA SPID <sup>1</sup> <b>0</b>	
LRN <sup>2</sup> <b>0</b>	

---

Block (1k) Range <sup>3</sup> <b>9</b>	
Block Effective Date <sup>4</sup> <b>08/02/2007</b>	
Is Block being allocated back to LERG Assignee on donating switch? <b>No</b>	
NPAC Activate Block Range <sup>5</sup> <b>No</b>	

**Pooling Admin Remarks**

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**Section B :**

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**Section B :**  
Block Applicant to provide the data ONLY if NPAC Activate Block Range is marked "YES". For Intra SP Block Porting the Block Holder should reflect the routing information of the switch the block is being transferred to<sup>9</sup>

	Class DPC <sup>7</sup>
	Class SSN <sup>8</sup>
	LIDB DPC <sup>9</sup>
	LIDB SSN <sup>10</sup>
	CNAM DPC <sup>11</sup>
	CNAM SSN <sup>12</sup>
	ISVM DPC <sup>13</sup>
	ISVM SSN <sup>14</sup>
	WSMSC DPC <sup>15</sup>
	WSMSC SSN <sup>16</sup>
	SOA Origination <sup>17</sup>

---

**Section C :**  
(NPAC is to Activate/Modify the Block (1K), as indicated on this form. When the Block (1K) Activation/Modification is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.)

Block (1K) Request Complete	No
Complete Date (MMDDYYYY)	
Complete Time (HHMM)	
NPAC Personnel performing change	
Block Holder sent Completed Form	No
Mailed Date (MMDDYYYY)	
Mailed Time (HHMM)	
Contact Name	
Pooling Administrator sent completed Form	No
Mailed Date (MMDDYYYY)	
Mailed Time (HHMM)	
Contact Name	

NPAC Remarks

**Instructions for filling out each Section of the Part 1B form:**

- 1) The requesting Block Applicant shall complete this form except for Block Range and Block Effective Date, when submitting PART 1 of the INC Thousands-Block Applicant form to the Pooling Administrator. A separate Part 1B form is to be completed for each 1K Block Range requested.
- 2) The Pooling Administrator will insert Block Range and Block Effective Date information, then submit this form to the regional NPAC at the same time PART 3 of the INC Thousands-Block Applicant form is returned to the requesting Block Applicant.



disagreement with 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:

<sup>1</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> 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  
Dara Sodano  
1800 Sutter St. Ste. 780  
Concord, CA 94520  
Phone: (925) 363-8730  
Fax: (925) 363-7697

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

**DATE:** 7/10/07  
**TO:** D. Blanton / Radey Law Firm  
**FROM:** Ruth Nettles, Division of the Commission Clerk &  
 Administrative Services  
**RE: Acknowledgment of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 070406 or (if filed in an undocketed matter) concerning Attachment 1 to Filing - Request for waiver of Pooling and Administrative denial. filed on behalf of Verizon Wireless. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-6770.

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PSC/CCA019-C(Rev 12/06)

**CONFIDENTIAL**

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