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COMMISSION
CLERK

RECEIVED-FPSC

August 1, 2007

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

Re: Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
St. Johns exchange (Worldgolf)

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   /RN

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

USA

CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code Denials
by the Number Pooling Administrator
for the St. Johns exchange (Worldgolf)

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

First Class U.S. Mail this 1st day of August, 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 St. Johns exchange (Worldgolf)) Filed: August 1, 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

St. Johns 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

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 St. Johns exchange consists of five (5) switching entities that utilize numbering resources: St. Augustine Shores (STAGFLSHRS0), St. Augustine Main (STAGFLMADS0), St. Augustine Beach Shores (STAGFLBSRS0), Mandarin Lemonwood (MNDRFLLWRS0), and St. Augustine Worldgolf (STAGFLWGRS0).

5.   On July 31, 2007, AT&T Florida requested additional numbering resources from NeuStar for the St. Augustine Worldgolf (STAGFLWGRS0) switch. See Attachment 1. Specifically, AT&T Florida requested a block to meet the request of a specific customer for 600 numbers in the format of NPA NXX-1XXX.

6.   At the time of the code request, the St. Johns exchange had a MTE of 95.04 and a utilization of 64.72%, while the St. Augustine Worldgolf (STAGFLWGRS0) switch had a MTE of 145.05.

7.   On July 31, 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 rate center based MTE 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 St. Johns 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. <u>See</u> 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.
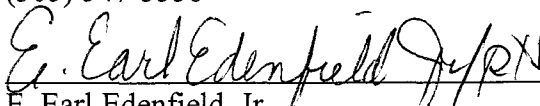
WHEREFORE, AT&T Florida requests:

1.   The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the St. Johns exchange; and

2.   The Commission direct NeuStar to provide the requested numbering resources for the St. Johns exchange as discussed above.

Respectfully submitted this 1st day of August, 2007.

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

James Meza III[1]
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150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

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

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[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.

4

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 ████████████
City ████████
State: ████
Zip: ██████

Contact Name ████████████
Contact Address ████████████
City ██████████   State ██████
Zip ██████

Telephone ████████████   Fax ████████

E-mail ████████@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 [iii] **No**

NPA **904**   LATA * | 452 |

OCN [iv]* **9417-BELLSOUTH SO BELL**

Parent Company OCN * | 9417 |

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) [v]* | STAGFLWGRSC | City or Wire Center Name | |

|

Rate Center ^{vi} **ST JOHNS**

Rate Center [_____]
Sub Zone

1.3 Dates

Date of Application ^{vii} **Tuesday, July 31, 2007**

Requested Block
Effective Date ^{viii} | 31 ▼ | Aug ▼ | 2007 ▼ |

Request Expedited ⦿ Yes ○ No
Treatment

1.4 Type of Service Provider Requesting the Thousands-Block

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)
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 ○ Yes

Growth block for rate center ⦿ Yes

Change block N/A

2

Disconnect block **N/A**

Remarks | Block needed for Specific customer request

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)

Continue

Pooling Administration System

@bridge.bellsouth.com (SP)   Sign Out

Date **Friday, July 27, 2007**
OCN **9417**
Company Name **BELLSOUTH SO BELL**
Rate Center **ST JOHNS**

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

Name of Block Applicant

Title ███████████

Telephone Number ███████████

Fax Number ███████████

E-Mail ███████████@bellsouth.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 months[2] *

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

F. Forecast - Next 12 months[3] *

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)

H. Months to Exhaust [4] (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

4

Block Requested	A. Available Numbers	H. Months to Exhaust
1	███████	95.040

I. Utilization[5](Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100   **64.717**

Explanation

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

Continue

Pooling Administration System

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

Your utilization calculates to **64.717 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

6

REDACTED

Exchange	Central Office	Wire Center CLLI	Number Blocks	Avg Growth Per Month	Available TNs	MTE	Utilzation
St. Johns	Shores	STAGFLSHRS0	21				
St. Johns	Main	STAGFLMADS0	101				
St. Johns	Beach Shores	STAGFLBSRS0	23				
St. Johns	Mandarin Lemonwood	MNDRFLLWRS0	79				
St. Johns	Worldgolf	STAGFLWGRS0	34				

Customer Contact Information