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**REDACTED**

070574-TL

RECEIVED - FPSC  
07 AUG 30 PM 4:22  
COMMISSION CLERK

August 30, 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 Pointe Vedra 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.

CMP

COM \_\_\_\_\_ 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  
CTR \_\_\_\_\_ on the attached Certificate of Service.

ECR \_\_\_\_\_

GCL 2 \_\_\_\_\_

OPC \_\_\_\_\_

RCA \_\_\_\_\_

cc: All Parties of Record  
SCR \_\_\_\_\_ Jerry D. Hendrix  
SGA \_\_\_\_\_ E. Earl Edenfield, Jr.  
SEC \_\_\_\_\_ James Meza III

OTH \_\_\_\_\_

Sincerely,

Manuel A. Gurdian

DOCUMENT NUMBER-DATE

07860 AUG 30 07

FPSC-COMMISSION CLERK

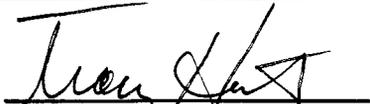
**CERTIFICATE OF SERVICE**  
**Petition for the Expedited Review of Growth Code Denials**  
**by the Number Pooling Administrator**  
**for the Pointe Vedra Beach Exchange (Main)**

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

First Class U.S. Mail this 30th 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](mailto: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 Ponte Vedra Beach Exchange(Main) ) Filed: August 30, 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 Ponte Vedra 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

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 Ponte Vedra Beach exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: Main (PNVDFLMADS0).

5. On August 29, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Main (PNVDFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested a block to meet the request of a specific customer for 100 consecutive numbers.

6. At the time of the code request, the Ponte Vedra Beach exchange had a MTE of 31.65 and a utilization of 74.77%.

7. On August 29, 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 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.

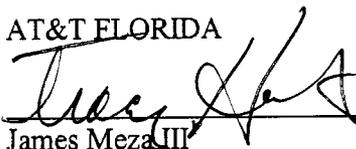
(b) As a result of NeuStar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

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 Ponte Vedra Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Ponte Vedra Beach exchange as discussed above.

Respectfully submitted this 30th day of August, 2007.

AT&T FLORIDA



James Meza III

Tracy W. Hatch

Manuel A. Gurdian

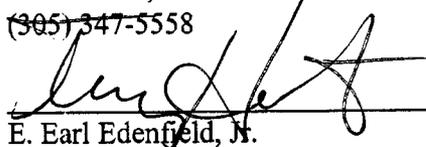
c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(905) 347-5558



E. Earl Edenfield, Jr.

AT&T Southeast

675 West Peachtree Street, Suite 4300

Atlanta, Georgia

(404) 335-0763

689374

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<sup>1</sup> 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

**Pooling Administration System**

@bridge.bellsouth.com (SP) Sign Out

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Request Resources

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State	FLORIDA
NPA	904
Rate Center	PNTVDRABCH
OCN	9417-BELLSOUTH SO BELL
Type of Application	Application for Individual Blocks
Quantity of Blocks Requested	1

**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**

REDACTED

[Redacted]@bridge.bellsouth.com (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 **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 **904**

LATA #

OCN <sup>lv</sup> **9417-BELLSOUTH SO BELL**

Parent Company OCN #

Number of Thousands-  
Blocks Requested **1**

Switch Identification  
(Switching Identity/POI) <sup>lv</sup> #

City or Wire  
Center Name

Rate Center <sup>lv</sup> **PONTE VEDRA BEACH**

Rate Center  
Sub Zone

REDACTED

<b>1.3 Dates</b>			
Date of Application <sup>vii</sup> <b>Wednesday, August 29, 2007</b>			
Requested Block Effective Date <sup>viii</sup> 29 Sep 2007			
Request Expedited Treatment <input type="radio"/> Yes <input checked="" type="radio"/> No			
<b>1.4 Type of Service Provider Requesting the Thousands-Block</b>			
a) Type of Service Provider * Incumbent Local Exchange Carrier (LEC)			
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
<b>1.5 Type of Request</b>			
Initial block for rate center <input type="radio"/> Yes			
Growth block for rate center <input checked="" type="radio"/> Yes			
Change block N/A			
Disconnect block N/A			

**REDACTED**

Remarks 

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

**Pooling Administration System**

@bridge.bellsouth.com (SP)

Sign Out

**Months to Exhaust and Utilization Certification Worksheet - TN Level**

Date **Tuesday, August 28, 2007**

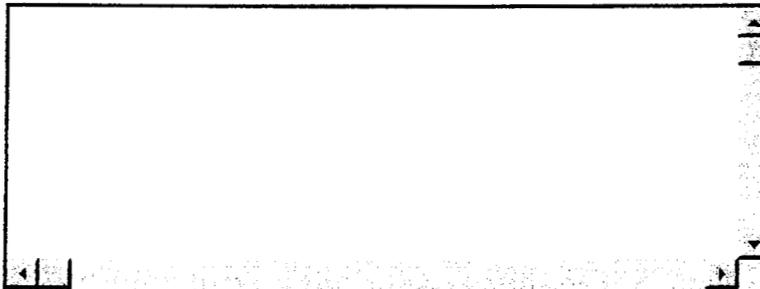
OCN **9417**

Company Name **BELLSOUTH SO BELL**

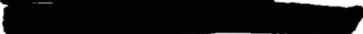
Rate Center **PONTE VEDRA BEACH**

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

# REDACTED

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 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) **201.000**

H. Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A Available Numbers	H Months to Exhaust
1	[REDACTED]	<b>31.652</b>

**REDACTED**

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

74.773

Explanation

Consecutive groups of DID numbers needed

<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)

## Pooling Administration System

bridge.bellsouth.com (SP)

Sign Out

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

Your utilization calculates to 74.773 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

**REDACTED**

Customer Information

