



Manuel A. Gurdian
Attorney
Legal Department

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5561
F: (305) 577-4491
manuel.gurdian@att.com

080720-TL

REDACTED

December 19, 2008

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

RECEIVED-FPSC
08 DEC 19 PM 4:15
COMMISSION
CLERK

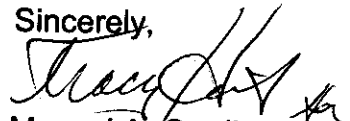
**Re: Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Daytona Beach Exchange (Main)**

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

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

- COM _____
- ECR _____
- GCL 2
- OPC _____
- RCP _____
- SSC _____
- SGA _____
- ADM _____
- CLK _____

DOCUMENT NUMBER-DATE

11728 DEC 19 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator) Docket No.
for the Daytona Beach exchange (Main))
) Filed: December 19, 2008
)

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 requests 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

11728 DEC 19 8

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), Ormond Beach (DYBHFLOBDS0) and Port Orange (DYBHFLPODS0).

5. On December 19, 2008, AT&T Florida requested additional numbering resources from NeuStar for the Main (DYBHFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested two (2) blocks to meet the request of a specific customer for 2,000 consecutive numbers in the format of NPA NX5 and 6.

6. At the time of the code request, the Daytona Beach exchange had a MTE of 72.04 and a utilization of 65.73%, while the Main (DYBHFLMADS0) switch had a MTE of 22.77.

7. On December 19, 2008, 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's 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.

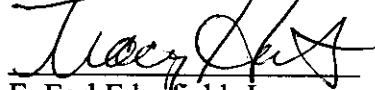
(c) As a result of NeuStar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

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 19th day of December, 2008.

AT&T FLORIDA



E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

726787

Pooling Administration System	
• Sign Out	
Time : 12/19/2008 07:39:53 AM EST	
<ul style="list-style-type: none"> <input type="checkbox"/> Individual Block Requests <input type="checkbox"/> CO/NXX Code Requests <input type="checkbox"/> Confirm Resources In Service <input type="checkbox"/> Donate Blocks <input type="checkbox"/> Submit Forecast <input type="checkbox"/> Search Forms <input type="checkbox"/> Reports <input type="checkbox"/> User Profile 	<div style="text-align: right;">Printable Version</div> <p style="text-align: center;">TBPAG Attachment 1 - March 19, 2007</p> <p style="text-align: center;">Thousands-Block Application Form - Part 1A</p> <p>Tracking Number: 386- DAYTONABCH- FL-262963 Individual Block Request</p> <p>Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect</p> <p style="text-align: center;">GENERAL APPLICATION INFORMATION</p> <p>1.1 Contact Information:</p> <p>Block Applicant:</p> <p>Company Name: BELLSOUTH SO BELL</p> <p>Headquarters Address: [REDACTED]</p> <p>City, State, Zip: [REDACTED]</p> <p>Contact Name: [REDACTED]</p> <p>Contact Address: [REDACTED]</p> <p>City, State, Zip: [REDACTED]</p> <p>Phone: 770- [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@att.com</p> <p>Pooling Administrator: ¹</p> <p>Contact Name: Dara Sodano</p> <p>Contact Address: 1600 Sutter St</p> <p>City, State, Zip: Concord, CA 94520</p> <p>Phone: 925-363-6730 FAX: 925-363-7997</p> <p>E-mail: dara.sodano@nstar.biz</p> <p>1.2 General Information:</p> <p>Check one : No LRN needed <input type="checkbox"/> LRN needed <input checked="" type="checkbox"/></p> <p>NPA: <u>386</u> LATA: <u>456</u> OCN: ^{iv} <u>9417</u> Parent Company's OCN <u>9409</u></p> <p>Number of Thousands-Blocks Requested : <u>2</u></p>

REDACTED

Switching Identification(Switch Entity/POI) : ^v

DYBHELMAD80

City or Wire Center Name : _____

DAYTONABCH

Rate Center: ^{vi}

DAYTONABCH

Rate Center Sub Zone: 01

1.3 Dates:

Date of Application: ^{vii}
12/19/2008

Requested Block Effective Date: ^{viii}
01/19/2009

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)

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

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____

CUSTOMER REQUEST

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
ALL EXCEPT ABOVE

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) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark that apply)

OCN:Intra-company ^{ix} Switching Id Part 1B

OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

a) Is this block Contaminated Yes _____ No _____

b) If Yes how many TNs are NOT available for assignment : _____

c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____

d) Has this block been protected from further assignment Yes _____ No _____

2

REDACTED

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

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) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.



**Associate
Technical
Support 12/19/2008
Analyst**
Title Date

Signature of Block Applicant

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

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CC Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLI™ tandem of the facilities based provider²¹. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

REDACTED

Foot Notes:

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Back

Question? Email us
 © 1997-2012 NeuStar, Inc.
 Legal Notice

4

Pooling Administration System

att.com (SP) • Sign Out

Time : 12/19/2008 07:40:22 AM EST

Printable Version
May 16, 2008

Appendix 3
MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 336-DAYTONABCH-FL-262963
 Date: 12/19/2008 OCN: 9417 Company Name: BELLSOUTH SO BELL

Rate Center: DAYTONABCH

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

Name of Block Applicant: [REDACTED] Signature: [REDACTED]
 Title: [REDACTED] Telephone No.: [REDACTED]
 FAX No: [REDACTED]
 E-mail: [REDACTED]att.com

A. Available Numbers [REDACTED]
 B. Assigned Numbers [REDACTED]
 C. Total Numbering Resources [REDACTED]
 D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation [REDACTED]

List Excluded Code(s) or Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	
E. Growth History - Previous 6 months ³ [REDACTED]												
F. Forecast - Next 12 months ⁴ [REDACTED]												
G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) [REDACTED]												

REDACTED

H. Months to Exhaust⁵
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

Available Numbers

Months To Exhaust

1

2

71.276

72.042

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 65.733

Total Numbering Resources(C)-Excluded Numbers(D)

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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousand-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

Back

Question? Email us
© 1997-2012 NeuStar, Inc.
Legal Notice

6

Pooling Administration System

att.com (SP) • Sign Out

Time : 12/19/2008 07:40:47 AM EST

Printable Version
Attachment 3

November 21, 2003
ATIS-0300066.at3

**Pooling Administrator's Response/Confirmation
TBPAAG Part 3**

Tracking Number : 386-
DAYTONABCH-
FL-262963

Date of Application: 12/19/2008 Effective Date: _____
Date of Receipt: 12/19/2008 Date of Response: 12/19/2008

Service Provider Name: BELLSOUTH SO BELL
(Telcordia™ LERG™ Routing Guide) OCN: 9417

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dara Sodano Phone: 925-363-8730
Signature of Pooling Administrator

Dara Sodano Fax: 925-363-7697
Name (print)

Email: dara.sodano@neustar.biz

NPA-NXX or NPA-NXX-X : _____ Block Assigned: _____
Block Reserved : _____
Block Reservation Expiration Date : _____
Block/Code Modified : _____
Block/Code Disconnected : _____

Block Contaminated(Yes or No) : _____
If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): 1 DVBHFLMADSO
Rate Center: DAYTONABCH
Rate Center Sub Zone: 01

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NOX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ 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.)

[Back](#)

Question? Email us
© 1997-2012 NeuStar, Inc.
Legal Notice

8

Daytona Beach
Utilization Summary
Report

REDACTED Attachment 2

Exchange	Central Office	Wire Center CLLI	Blocks	Avg Growth Per Month	Available TNs	MTE	Util
Daytona Beach	Fentress	DYBHFLNRS0	10				
Daytona Beach	Main	DYBHFLMADS0	144				
Daytona Beach	Ocean Shores	DYBHFLOSRS0	11				
Daytona Beach	Ormond Beach	DYBHFLOBDS0	62				
Daytona Beach	Port Orange	DYBHFLOPDS0	79				

Customer Contact Information

