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April 8, 2009

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

090175

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Jupiter 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 _____
- OPC _____
- RCP _____
- SSC _____
- SGA _____
- ADM _____
- CLK _____

DOCUMENT NUMBER - DATE

03145 APR-8 8

FPSC-COMMISSION CLERK

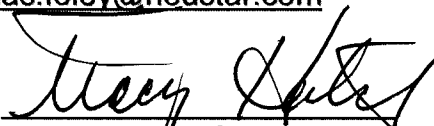
CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Jupiter Exchange (Main)

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

First Class U.S. Mail this 8th day of April, 2009 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)
Code Denials by the Number Pooling Administrator)
for the Jupiter exchange (Main))
_____)

Docket No.
Filed: April 8, 2009

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 Jupiter 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

03145 APR-8 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 Jupiter exchange consists of one switching entity that utilizes numbering resources: Main (JPTRFLMADS0).

5. On April 2, 2009, AT&T Florida requested additional numbering resources from NeuStar for the Main (JPTRFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to meet the request of a specific customer. The format of the NXX needs to be in the format of NX2, 3, 4, 5, 6, 7 or 8.

6. At the time of the code request, the Jupiter exchange had a MTE of 11.28 and a utilization of 73.25%.

7. On April 2, 2009, 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.

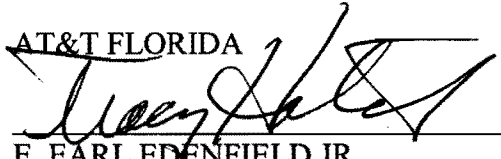
WHEREFORE, AT&T Florida requests:

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

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

Respectfully submitted this 8th day of April, 2009.

AT&T FLORIDA

A handwritten signature in black ink, appearing to read "Tracy Hatch", written over a horizontal line.

E. EARL EDENFIELD JR.

TRACY W. HATCH

MANUEL A. GURDIAN

c/o Gregory R. Follensbee

150 South Monroe Street, Ste. 400

Tallahassee, FL 32301

(305) 347-5558

733196

Pooling Administration System	
Time : 04/02/2009 08:48:23 AM EDT	
[Redacted]@att.com (SP)	• Sign Out
Printable Version TBPAG Attachment 1 - March 19, 2007	
Thousands-Block Application Form - Part 1A	
Tracking Number:	561- JUPITER-FL- 281645
	Full NXX: Dedicated Customer
Type of Application:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect
GENERAL APPLICATION INFORMATION	
1.1 Contact Information:	
<u>Block Applicant:</u>	
Company Name:	BELLSOUTH SO BELL
Headquarters Address:	675 West Peachtree St ne
City, State, Zip:	atlanta, GA, 30375
Contact Name:	[Redacted]
Contact Address:	[Redacted]
City, State, Zip:	[Redacted]
Phone:	[Redacted]
FAX:	[Redacted]
E-mail:	[Redacted]@att.com
<u>Pooling Administrator:</u>	
Contact Name:	Dara Sodano
Contact Address:	1800 Sutter St
City, State, Zip:	Concord, CA, 94520
Phone:	925-363-8730 FAX: 925-363-7997
E-mail:	dara.sodano@nstar.biz
1.2 General Information:	
Check one : No LRN needed <input checked="" type="checkbox"/> LRN needed ^{III} _____	
NPA:	561
LATA:	460
OCN:	9417
Parent Company's OCN	9460

Number of Thousands-Blocks Requested : 10

Switching Identification(Switch Entity/POI) : ^v
JPTRELMADSO

City or Wire Center Name : _____ Rate Center: ^{vi} JUPITER

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 04/02/2009 Requested Block Effective Date: ^{viii} 06/07/2009

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) _____
SEE BELOW

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any CUSTOMER CANNOT USE NXX, NX1, NX9

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 _____ 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 be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all 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 _____

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.

[Redacted Signature]

Signature of Block Applicant

[Redacted Signature]

04/02/2009

Date

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 CO 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 CLLI™ tandem of the facilities based provider^{x1}. 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. The 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., 321-8XXX.

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.

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 CLLI™ 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.

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Pooling Administration System

[Redacted]@att.com (SP)
• Sign Out

Time : 04/02/2009 08:48:42 AM EDT

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: 561-JUPITER-FL-281645
 Date: 04/02/2009 OCN: 9417 Company Name: BELLSOUTH SO BELL

Rate Center: JUPITER

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 ²: [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]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	
F. Forecast - Next 12 months ⁴												
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	
G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): [Redacted]												

5

H. Months to Exhaust⁵
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

Months To Exhaust

11.275

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 = 73.25
=

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 thousands-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))

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Pooling Administration System	
<div style="display: flex; justify-content: space-between;"> ██████████@att.com (SP) • Sign Out </div>	
Time : 04/02/2009 08:49:01 AM EDT	
Printable Version	
November 21, 2003 Attachment 3 ATIS-0300066.at3 Pooling Administrator's Response/Confirmation TBPAG Part 3	
Tracking Number :	<u>581-JUPITER-FL-281645</u>
Date of Application:	<u>04/02/2009</u> Effective Date: _____
Date of Receipt:	<u>04/02/2009</u> Date of Response: <u>04/02/2009</u>
Service Provider Name:	<u>BELLSOUTH SO BELL</u>
(Telcordia TM LERG TM Routing Guide) OCN:	<u>9417</u>
NPAC SOA SPID :	_____
Pooling Administrator Contact Information:	
<u>Dara Sodano</u> Phone:	<u>925-363-8730</u>
Signature of Pooling Administrator	
<u>Dara Sodano</u> Fax:	<u>925-363-7697</u>
Name (print)	
Email:	<u>dara.sodano@neustar.biz</u>
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	<u>JPTRFLMADSO</u>
Rate Center:	<u>JUPITER</u>
Rate Center Sub Zone:	_____

7

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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 (NXX-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.)

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Pooling Administration System	
 [REDACTED]att.com (SP)	• Sign Out
Time : 04/02/2009 08:44:34 AM EDT	
	<p>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</p> <p>Your Utilization calculates to 73.250%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</p> <p style="text-align: center;">Select One Option and Submit</p> <p style="text-align: center;"><input checked="" type="radio"/> Return to the Months To Exhaust Form <input type="radio"/> Need to request a State Waiver <input type="radio"/> Received a State Waiver</p> <p style="text-align: center;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>
<small>Question? Email us © 1997-2012 NeuStar, Inc. Legal Notice</small>	

9

REDACTED

Customer Contact Information



Pool & CONFIDENTIAL System

rena.wilkie@att.com (SP)

Sign Out

Time : 04/02/2009 08:48:23 AM EDT

Printable Version

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 561- JUPITER-FL- 281645 Full NXX: Dedicated Customer

Type of Application: [X] New [] Change [] Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: BELLSOUTH SO BELL Headquarters Address: 675 West Peachtree St ne City, State, Zip: atlanta, GA, 30375 Contact Name: rena butticaz Contact Address: 675 West Peachtree St NE City, State, Zip: Atlanta, GA, 30375 Phone: 770- 945-9630 FAX: 770- 945-9630 E-mail: rw0052@att.com

Pooling Administrator: ⁱⁱ

Contact Name: Dara Sodano Contact Address: 1800 Sutter St City, State, Zip: Concord, CA, 94520 Phone: 925-363-8730 FAX: 925-363-7897 E-mail: dara.sodano@meustar.biz

1.2 General Information:

Check one : No LRN needed [X] LRN needed ⁱⁱⁱ []

NPA: 561 LATA: 460 OCN: ^{iv} 9417 Parent Company's OCN 9400