



Manuel A. Gurdian
General Attorney

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July 15, 2011

REDACTED

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

110225-TL

**Re: Petition for the Expedited Review of Growth Code Denial by
the Number Pooling Administrator for the Miami Exchange
(Metro)**

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, LLC d/b/a AT&T Florida's Petition for Expedited Review of Growth Code Denial, which we ask that you file in the captioned 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 _____
APA _____
ECR _____
GCL 1 _____
(RAD) 6 _____
SSC _____
ADM _____
OPC _____
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DOCUMENT NUMBER-DATE

04917 JUL 15 =

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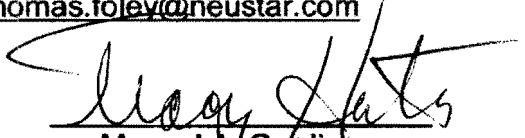
CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth
Code Denial by the Number Pooling Administrator
for the Miami Exchange (Metro)

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

First Class U.S. Mail this 15th day of July, 2011 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 Denial by the Number Pooling Administrator)
for the Miami Exchange (Metro)) Filed: July 15, 2011
_____)

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

BellSouth Telecommunications, LLC 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-01-1973-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 Miami exchange. In support of this petition, AT&T Florida states:

PARTIES

1. AT&T Florida is a limited liability company organized and formed under the laws of the State of Georgia 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.

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BACKGROUND AND REQUEST FOR RELIEF

4. The Miami exchange consists of twenty four (24) central offices and twenty eight (28) switching entities that utilize numbering resources: Airport (MIAMFLAPDS0), Alhambra (MIAMFLAEDS0 and MIAMFLAERS0), Allapattah (MIAMFLALDS0), Bayshore (MIAMFLBA85E), Beach (MIAMFLBRDS0), Biscayne (MIAMFLBCDS0), Canal (MIAMFLCADS0), Dadeland (MIAMFLDBRS1), Flagler (MIAMFLFLDS0), Grande (MIAMFLGRDS0 and MIAMFLGRDS1), Hialeah (MIAMFLHLDS0), Indian Creek (MIAMFLICDS0), Key Biscayne (MIAMFLKEDS0), Metro (MIAMFLMERP0 and MIAMFLMERS0), Shores (MIAMFLSHDS0), North Miami (MIAMFLNMDS0), Northside (MIAMFLNSDS0), Opa Locka (MIAMIFLOLDS0), Palmetto (MIAMFLPLDS0 and MIAMFLPLRS0), Poinciana (MIAMFLPBDS0), Red Road (MIAMFLRRDS0), Silver Oaks (MIAMFLSODS0), West Dade (MIAMFLWDDS0) and West Miami (MIAMFLWMDS0).

5. On July 6, 2011, AT&T Florida requested additional numbering resources from NeuStar for the Metro (MIAMFLMERP0) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to establish a test code for its new remote switch that will be replacing the 1AESS in Miami Metro. The code will be returned approximately 1 year after it is effective. AT&T Florida needs an unused NPA NXX and is unable to use a donated block from another switch since the new switch will need a home code assigned to it.

6. At the time of the code request, the Miami exchange had a MTE of 139.26 and a utilization of 57.812%, while the MTE for the Metro (MIAMFLMERP0) switch was 76.39.

7. On July 6, 2011, 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. 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 Miami exchange. 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) 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

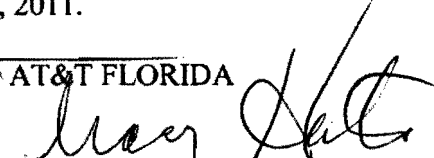
switches in a rate center. The ILEC deploys multiple switches in a rate center in order to meet customer demand for telephone service. The FCC's rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida believes that it is 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.

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

Respectfully submitted this 15th day of July, 2011.

AT&T FLORIDA



Manuel A. Gurdian

Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5561

Pooling Administration System

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Attachment 3

- Individual Block Requests
- CO/NXX Code Requests
- Withdraw Pending Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

November 21, 2003
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAAG Part 3

Tracking Number : 305-MIAMI-FL-456347

Date of Application: 07/06/2011 Effective Date: _____
Date of Receipt: 07/06/2011 Date of Response: 07/06/2011

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

(Telcordia™ LERG™ Routing Guide) OCN: 9417

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dara Flowers Phone: 925-363-8730

Signature of Pooling Administrator
Dara Flowers Fax: 925-363-7697

Name (print) _____
Email: dara.flowers@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 MIAMFLMERPO

Rate Center: MIAMI

Rate Center Sub Zone: _____

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 TM 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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- Individual Block Requests
- CO/NXX Code Requests
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Appendix 3

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

Tracking Number: 305-MIAMI-FL-456347

Date: 07/08/2011

OCN: 9417

Company Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: MIAMI

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

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: Sr. Specialist

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: 0

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

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History - Previous 6 months³

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
------------	------------	------------	------------	------------	------------	------------	------------	------------	------------	------------	------------

F. Forecast - Next 12 months⁴

[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]

3

H. Months to Exhaust⁵
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

[REDACTED]

Months To Exhaust

139.26

I. Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 67.812

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 (NX-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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-   Withdraw Pending Requests
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Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

Your Utilization calculates to 57.812%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver

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Appendix 3

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

Tracking Number: 305-MIAMI-FL-456347

Date: 07/06/2011

OCN: 9417

Company Name: BELL SOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: MIAMI

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

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: Sr. Specialist

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

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

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History - Previous 6 months³

[REDACTED]

F. Forecast - Next 12 months⁴

[REDACTED]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): [REDACTED]

6

H. Months to Exhaust⁵
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

~~REDACTED~~

Months To Exhaust

139.26

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 57.812

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.

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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 00-104, section 52.15 (g) (3)(ii))

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Your Utilization calculates to 57.812%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver

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Exchange	Central Office	Wire Center CLLI	Miami Utilization Summary		MTE	Util
			Report Blocks	Available TNs		
Miami	Airport	MIAMFLAPDS0	75			
Miami	Alhambra	MIAMFLAEDS0	175			
Miami	Alhambra	MIAMFLAERS0	6			
Miami	Alapattah	MIAMFLALDS0	61			
Miami	Bayshore	MIAMFLBA85E	85			
Miami	Beach	MIAMFLBRDS0	119			
Miami	Biscayne	MIAMFLBCDS0	41			
Miami	Canal	MIAMFLCADS0	188			
Miami	Dadeland	MIAMFLDBRS1	20			
Miami	Flagler	MIAMFLFLDS0	75			
Miami	Grande	MIAMFLGRDS0	37			
Miami	Grande	MIAMFLGRDS1	347			
Miami	Hialeah	MIAMFLHLDS0	219			
Miami	Indian Creek	MIAMFLICDS0	69			
Miami	Key Biscayne	MIAMFLKEDS0	22			
Miami	Metro	MIAMFLMERP0	101			
Miami	Metro	MIAMFLMERS0	8			
Miami	Shores	MIAMFLSHDS0	80			
Miami	North Miami	MIAMFLNMDS0	60			
Miami	Northside	MIAMFLNSDS0	68			
Miami	Opa Locka	MIAMFLOLDS0	62			
Miami	Palmetto	MIAMFLPLDS0	306			
Miami	Palmetto	MIAMFLPLRS0	12			
Miami	Poinciana	MIAMFLPBDS0	98			
Miami	Red Road	MIAMFLRRDS0	133			
Miami	Silver Oaks	MIAMFLSODS0	130			
Miami	West Dade	MIAMFLWDDS0	96			
Miami	West Miami	MIAMFLWMDS0	104			

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