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**REDACTED**

October 4, 2011

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

RECEIVED-FPSC  
11 OCT -4 PM 4: 35  
COMMISSION  
CLERK

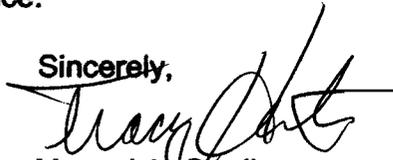
Re: Docket No. 110284-TP  
Petition for Expedited Review of Growth Code Denial by the  
Number Pooling Administrator for the Cocoa Beach exchange  
(Cape Canaveral)

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  
Suzanne L. Montgomery

COM \_\_\_\_\_  
APA \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1 \_\_\_\_\_  
**RAD** 6 \_\_\_\_\_  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK \_\_\_\_\_

DOCUMENT NUMBER DATE  
07218 OCT-4 =  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth )  
Code Denial by the Number Pooling Administrator )  
for the Cocoa Beach exchange (Cape Canaveral) )

Docket No. 110284-TP  
Filed: October 4, 2011

**PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL**

BellSouth Telecommunications, LLC<sup>1</sup> 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 Cocoa Beach exchange. In support of this petition, AT&T Florida states:

**PARTIES**

1. AT&T Florida is an incumbent local exchange company (“ILEC”) 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

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<sup>1</sup> Effective July 1, 2011, BellSouth Telecommunications, Inc. was converted to BellSouth Telecommunications, LLC by operation of Georgia law.

DOCUMENT NUMBER-DATE  
07218 OCT-4 =  
FPSC-COMMISSION CLERK

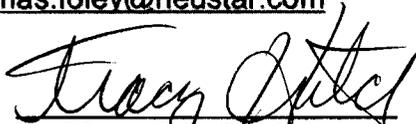
**CERTIFICATE OF SERVICE**  
**Petition for Expedited Review of Growth Code Denial by the**  
**Number Pooling Administrator for the Cocoa Beach exchange**  
**(Cape Canaveral)**

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

First Class U.S. Mail this 4th day of October, 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](mailto:thomas.foley@neustar.com)

  
Manuel A. Gurdian

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 Cocoa Beach exchange consists of two (2) central offices and two (2) switching entities that utilizes numbering resources: Cocoa Beach Main (CCBHFLMADS0) and Cape Canaveral (CCBHFLAFRS0).

5. On September 29, 2011, AT&T Florida requested additional numbering resources from NeuStar for the Cape Canaveral (CCBHFLAFRS0) switch. See Attachment 1. Specifically, AT&T Florida requested one (1) block to meet the request of a specific customer for 1,000 consecutive numbers in the format of NPA NXX-4XXX.

6. At the time of the code request, the Cocoa Beach exchange had a MTE of 182.73 and a utilization of 53.81%, while the MTE for the Cape Canaveral (CCBHFLAFRS0) switch was 194.57.

7. On September 29, 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, 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 Cocoa Beach 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 Cocoa Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Cocoa Beach exchange as discussed above.

Respectfully submitted this 4th day of October 2011.

AT&T FLORIDA



Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5560

Pooling Administration System	
<div style="display: flex; justify-content: space-between;"> <span>ATT.COM (SP)</span> <span>Sign Out</span> </div>	
Time : 09/29/2011 02:25:20 PM EDT	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Individual Block Requests</li> <li><input type="checkbox"/> CO/NXX Code Requests</li> <li><input type="checkbox"/> Withdraw Pending Requests</li> <li><input type="checkbox"/> Confirm Resources in Service</li> <li><input type="checkbox"/> Donate Blocks</li> <li><input type="checkbox"/> Submit Forecast</li> <li><input type="checkbox"/> Search Forms</li> <li><input type="checkbox"/> Reports</li> <li><input type="checkbox"/> User Profile</li> </ul>	<div style="text-align: right;">Printable Version Attachment 3</div> <p>November 21, 2003 ATIS-Q300066.at3</p> <p style="text-align: center;"><b>Pooling Administrator's Response/Confirmation TBPAQ Part 3</b></p> <p>Tracking Number : <u>321-COCOABEACH-FL-486031</u></p> <p>Date of Application: <u>09/29/2011</u>      Effective Date: _____ Date of Receipt: <u>09/29/2011</u>      Date of Response: <u>09/29/2011</u></p> <p>Service Provider Name: <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL &amp; TEL</u> (Telcordia™ LERG™ Routing Guide ) OCN: <u>9417</u></p> <p>NPAC SOA SPID : _____</p> <p><b>Pooling Administrator Contact Information:</b></p> <p><u>Dara Flowers</u> Phone: <u>925-363-8730</u> Signature of Pooling Administrator</p> <p><u>Dara Flowers</u> Fax: <u>925-363-7897</u> Name (print)</p> <p>Email: <u>dara.flowers@neustar.biz</u></p> <p>NPA-NXX or NPA-NXX-X : _____      Block Assigned: _____ Block Reserved : _____ Block Reservation Expiration Date : _____ Block/Code Modified : _____ Block/Code Disconnected : _____</p> <p>Block Contaminated(Yes or No) : _____ If Yes, enter the number of TNs contaminated : _____</p> <p>Switch Identification(Switch Entity/POI): <u>1 CCBHFLAFRS0</u> Rate Center: <u>COCOABEACH</u> Rate Center Sub Zone: _____</p>

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 (NXX-X) Pooling Administration Guidelines for the appeals process.**

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

<sup>1</sup> 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.)



**Pooling Administration System**

ATT.COM (SP) Sign Out

Time : 09/29/2011 02:20:13 PM EDT Printable Version

TBPAG Attachment 1 - March 19, 2007

**Thousands-Block Application Form - Part 1A**

Tracking Number: **321-COCOABEACH-FL-486031**  
**Individual Block Request**

Type of Application:  New  Change  Disconnect

**GENERAL APPLICATION INFORMATION**

1.1 Contact information:

**Block Applicant:**  
Company Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**  
Headquarters Address: [REDACTED]  
City, State, Zip: [REDACTED]  
Contact Name: [REDACTED]  
Contact Address: [REDACTED]  
City, State, Zip: [REDACTED]  
Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@ATT.COM

**Pooling Administrator:**  
Contact Name: **Dara Flowers**  
Contact Address: **1800 Sutter St**  
City, State, Zip: **Concord, CA, 94520**  
Phone: **925-363-8730** FAX: **925-363-7697**  
E-mail: **dara.flowers@neustar.biz**

1.2 General Information:

Check one : No LRN needed  LRN needed

NPA: 321 LATA: 468 OCN: 9417 Parent Company's OCN 9400  
Number of Thousands-Blocks Requested : 1

3

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
CCBHFLAFRS0

City or Wire Center Name : \_\_\_\_\_

Rate Center: <sup>vi</sup>  
COCOABEACH

Rate Center Sub Zone: \_\_\_\_\_

1.3 Dates:

Date of Application: <sup>vii</sup> \_\_\_\_\_  
09/29/2011

Requested Block Effective Date: <sup>viii</sup>  
10/30/2011

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 X No \_\_\_\_\_

Expedited Explanation:

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 IS REQUESTING 1 BLOCK IN NPA 321 WITH THE FIRST DIGIT OF THE BLOCK TO EQUAL \_\_\_\_\_ AND IN THE POOL LIST BLOCK \_\_\_\_\_ AVAILABLE AND AS NON-CONTAMINATED.**

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_  
ALL OTHERS.

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 all that apply)

OCN:Intra-company <sup>ix</sup>  Switching Id  Part 1B

OCN:inter-company <sup>x</sup>  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 \_\_\_\_\_

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

Disconnect block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

Remarks: **CUSTOMER IS REQUESTING 1 BLOCK IN NPA 321 WITH THE FIRST DIGIT OF THE BLOCK TO EQUAL 4 (321-NXX-XXXX) AND IN THE POOL LIST BLOCK 321-406-4 IS AVAILABLE AND AS NON-CONTAMINATED.**

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-030066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

		08/29/2011
Signature of Block Applicant	Title	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<sup>xi</sup>. 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

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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 :**

- <sup>i</sup> Identify the type of change(s) in Section 1.5.
- <sup>ii</sup> The Pool Administrator is available to assist in completing these forms.
- <sup>iii</sup> A CO Code application will also need to be submitted to the PA.
- <sup>iv</sup> 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) (732-689-6700).
- <sup>v</sup> 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.
- <sup>vi</sup> Rate Center name must be a tariffed Rate Center.
- <sup>vii</sup> 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.
- <sup>viii</sup> 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).
- <sup>ix</sup> Select if you are the current Block Holder.
- <sup>x</sup> Select if you are not the current Block Holder
- <sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

[Back](#)

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**Pooling Administration System**

Time : 09/29/2011 02:24:28 PM EDT Printable Version  
May 18, 2008

**Appendix 3**  
**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>**  
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 321-COCOABEACH-FL-488031

Date: 09/29/2011      OCN: 3417      Company Name: BELL SOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: COCOABEACH

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 Resource: [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 #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
[REDACTED]											

E. Growth History - Previous 6 months<sup>3</sup>: [REDACTED]

F. Forecast - Next 12 months<sup>4</sup>: [REDACTED]

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

H. Months to Exhaust<sup>5</sup>

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

Months To Exhaust

182.73

I.

Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers(D) X 100 =  
53.605

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

Explanation: \_\_\_\_\_

<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>Quantity 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).

<sup>3</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>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</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, section 52.15 (g) (3) (ii)).

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



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<b>Pooling Administration System</b>	
<div style="display: flex; justify-content: space-between;"> <span>ATT.COM (SP)</span> <span>• Sign Out</span> </div>	
Time : 09/29/2011 02:17:31 PM EDT	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Individual Block Requests</li> <li><input type="checkbox"/> CO/NXX Code Requests</li> <li><input type="checkbox"/> Withdraw Pending Requests</li> <li><input type="checkbox"/> Confirm Resources In Service</li> <li><input type="checkbox"/> Donate Blocks</li> <li><input type="checkbox"/> Submit Forecast</li> <li><input type="checkbox"/> Search Forms</li> <li><input type="checkbox"/> Reports</li> <li><input type="checkbox"/> User Profile</li> </ul>	<p><b>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup></b></p> <p>Your Utilization calculates to 53.806%. 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;"><b>Select One Option and Submit</b></p> <ul style="list-style-type: none"> <li><input type="radio"/> Return to the Months To Exhaust Form</li> <li><input type="radio"/> Need to request a State Waiver</li> <li><input type="radio"/> Received a State Waiver</li> </ul> <div style="text-align: center; margin-top: 20px;"> <input type="button" value="Submit"/> <input type="button" value="Cancel"/> </div>
<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: center;"> <p>Question? Email us</p> <p>© 1997-2012 Neustar, Inc.</p> <p>Legal Notice</p> </div> </div>	

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Cocoa Beach  
Utilization Summary  
Report

Attachment 2

**REDACTED**

Exchange	Central Office	Wire Center CLLI	Blocks	Available TNs	Average Growth	MTE	Util
Cocoa Beach	Main	CCBHFLMADS0	41				
Cocoa Beach	Cape Canaveral	CCBHFLAFRS0	6				

**Customer Contact Information**

[REDACTED]