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REDACTED

August 7, 2012

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

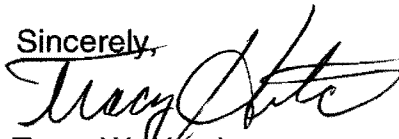
RECEIVED FPSC
12 AUG - 7 PM 4:48
COMMISSION
CLERK

Re: **Docket No. 120217-TP**
**Petition for Expedited Review of Growth Code Denial by the
Number Pooling Administrator for the Chipley exchange (Main)**

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 *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,

Tracy W. Hatch

cc: All Parties of Record
Joe S. York
Gregory R. Follensbee
Suzanne L. Montgomery

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL 1
- IDM _____
- TEL 6
- CLK _____

DOCUMENT NUMBER-DATE

05391 AUG-7 12

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth
Code Denial by the Number Pooling Administrator
for the Chipley exchange (Main)

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

First Class U.S. Mail this 7th day of August, 2012 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


Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the Chipley exchange (Main))
_____)

Docket No. 120217-TP
Filed: August 7, 2012

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 Commission Order No. PSC-01-1973-PCO-TL, petitions the Commission to review the denial by Neustar, Inc., acting as the Pooling Administrator ("Neustar") of AT&T Florida's requests for additional numbering resources in the Chipley exchange. In support of this petition, AT&T Florida states:

PARTIES

1. AT&T Florida is a limited liability company corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company ("ILEC") authorized to provide local exchange telecommunications service and intraLATA toll telecommunications service in the State of Florida.

2. Neustar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources for requests in Non-Pooling situations.

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.

DOCUMENT NUMBER-DATE
05391 AUG-7 2012
FPSC-COMMISSION CLERK

BACKGROUND AND REQUEST FOR RELIEF

4. The Chipley exchange consists of one central office and one switching entity that utilize numbering resources: Main (CHPLFLJADS0).

5. On May 9, 2012, AT&T Florida made an initial request and supplemented that request on July 19, 2012. AT&T Florida requested additional numbering resources from Neustar for the Chipley Main (CHPLFLJADS0) switch. See Attachment 1. Specifically, AT&T Florida requested a 700 consecutive numbers in the format of 850 NXX-1XXX, 6XXX, or 7XXX for a specific customer.

6. At the time of the code request, the Chipley exchange had a MTE of 3.67 and a utilization of 43.46%.

7. On July 23, 2012, Neustar 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 its current procedures, NeuStar looks at the number of MTE and utilization for the entire rate center without exception, regardless of the reason for the request, customer impact or public interest impact. The current process is arbitrary and

results in (1) decisions contrary to the public interest and welfare of consumers in 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 in Florida, and specifically interferes with AT&T Florida's ability to serve its customer identified in Attachment 2.

(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.

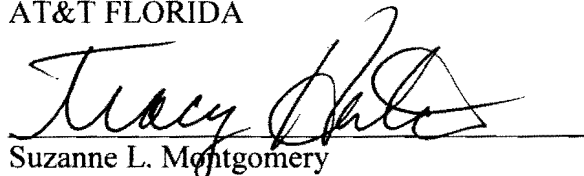
WHEREFORE, AT&T Florida requests:

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

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

Respectfully submitted this 7th day of August, 2012.

AT&T FLORIDA

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

Suzanne L. Montgomery
Authorized House Counsel No. 94116
Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

1042691

Central Office Code (NXX) Assignment Request - Part 1

March 5, 2010

Tracking Number: 850-440455

Type of Application: [x] New [] Change 1 [] Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

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

Headquarters Address: [REDACTED]

City, State, Zip: Atlanta, GA, 30375

Contact Name: [REDACTED]

Contact Address: [REDACTED]

City, State, Zip: Gainesville, GA, 30501

Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@att.com

Code Administrator: 2

Name: Michael Ortega
Address: 48000 Center Oak Plaza,

City, State, Zip: Sterling, VA, 20166

Phone: 571-434-5348 FAX: 571-434-5502

1.2 NPA: 850 NXX: 3 LATA: 45009 OCN: 48417 Parent Company's OCN(s) 9400

Switching Identification (Switch Entity/POI) 5 CHPLFLJADS0

Locality/City/Wire Center: Rate Center: 6 CHIPLEY

Homing Tandem Operating Co: 7 AT&T Tandem Homing CLLI: 8 PNCYFLMA04T

1.3 Dates: Date of Application: 07/19/2012 Request Effective Date: 9 10 09/16/2012

[x] 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.

Expedite Reason: ___

1.4 Type of company/entity requesting the code:

- a) Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)
b) Types of service: Wireline (e.g., Cellular - Type 2)
c) Code Assignment Preference (Optional)
d) Codes that are undesirable, if any
e) Type of change (Mark all that apply)
[] OCN-Intra-company [] Switching Id [] Rate Center [] Tandem Homing CLLI
[] OCN-Inter-company [] Effective Date [] LATA [] Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain):

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application. ¹⁴

	<u>Sr. Specialist</u>	<u>07/19/2012</u>
Signature of Code Applicant:	Title	Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-899-6700.

⁵This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This 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, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will

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leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

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Effective June 11, 2001

Appendix B

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Request for Additional Codes for Growth)

Date: 07/19/2012 Company Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: CHIPLEY

NPA-NXXs included in growth calculation²: _____

Signature of Authorized Representative of Code Applicant: [Redacted]

Title: Sr. Specialist Telephone No.: [Redacted] FAX No.: [Redacted]

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 6194

Table with 12 columns (Month #1 to #12) and 2 rows (B. Previous 6-month growth history, C. Forecast - Next months 1-12). All cells are redacted.

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): [Redacted]

E. Months to Exhaust⁴ = Telephone Numbers(TNs) Available for Assignment(A) / Average Monthly Forecast(D) = [Redacted]

F. Utilization Level⁷ = Telephone Numbers (TNs) Assigned / Total Numbering Resources in Applicant's Inventory X 100 = [Redacted]

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Code Administrator, for audit purposes, it must be in the applicant's files.

²Report on all resources for the requested geographic area, including newly acquired codes.

³Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

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

⁷Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, section 52.15 (g) (3) (ii)).

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**Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request - Part 3 - ATIS-0300050.p3
Revised: February 9, 2004**

Administrator's Response/Confirmation Tracking Number: 850-440455

Date of Application:	<u>07/19/2012</u>	Date of RECEIPT:	<u>07/19/2012</u>
Date of Response:	<u>07/23/2012</u>	Effective Date:	_____
Company/Entity Name:	<u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u>	Service Provider OCN:	<u>9417</u>
Contact Name:	<u>[REDACTED]</u>	Phone:	<u>[REDACTED]</u>
		Email:	<u>[REDACTED]@att.com</u>
		Fax:	<u>[REDACTED]</u>

Code Administrator Contact Information:

<u>Michael Ortega</u>	Phone:	<u>571-434-5348</u>
<u>Signature of Code Administrator</u>		
<u>Michael Ortega</u>	Fax:	<u>571-434-5502</u>
<u>Name (print)</u>		
	Email:	<u>michael.ortega@neustar.biz</u>

____ NPA: 850 Code Assigned: ____ Date of NXX Code Assignment: ____

____ Switch Identification(Switch Entity/POI): _____

Rate Center:
CHIPLEY

____ Code Reserved: _____ Date of Reservation: _____

Your code Reservation will be honored until: _____

Switch Identification (Switch Entity/POI): _____

Form Incomplete

Additional information required in the following sections(s)

X **Form Complete, code request denied.**

Explanation: _____

____ **Assignment activity suspended by the administrator.**

Explanation: _____

Further Action: _____

____ NPA in jeopardy: Yes: _ No: _

If yes, refer to the Section 9 of the assignment guidelines

Remarks:

According to the FCC 2nd Report and Order (FCC 00-429) effective June 30, 2003, in order to receive additional numbering resources, the MTE form you submit must meet the 75% utilization level. If you are in

disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.

A copy of this Part 3 has been sent to the following users/email addresses.

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REDACTED

Customer Contact Information

