



CenturyLink™

April 17, 2013

VIA HAND DELIVERY

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
13 APR 17 PM 4:35
COMMISSION
CLERK

RE: Docket No. 130085-TL, Petition for Expedited Review of Growth Code Denials by the North American Numbers Plan Administration for the Winter Garden Exchange

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. d/b/a CenturyLink (CenturyLink) are the original and seven copies of CenturyLink's Petition for expedited Review of NXX-X Code Denial, which we ask that you file in the captioned new docket.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at (850) 599-1560.

Sincerely,

Susan S Masterton
Susan S. Masterton

Enclosure

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL _____
CLK _____

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DOCUMENT NUMBER-DATE

02031 APR 17 2

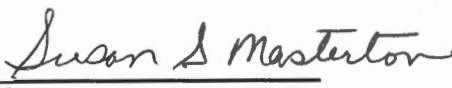
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. _____

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by regular U.S. Mail on this 17th day of April, 2013 to the following:

Florida Public Service Commission
Staff Counsel
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

NANPA
Tom Foley, Relief Planner
Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779-2327



Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the North American Numbering Plan Administration for the Winter Garden Exchange

Docket No. 130085-7L

Date Filed: April 17, 2013

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Embarq Florida, Inc. d/b/a CenturyLink (“CenturyLink”), 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 CenturyLink’s request for additional numbering resources in the Winter Garden Exchange. In support of this petition, CenturyLink states:

PARTIES

1. CenturyLink 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 the Industry Numbering Committee’s (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

02031 APR 17 2013

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BACKGROUND AND REQUEST FOR RELIEF

4. The Winter Garden Exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources.

5. On April 16, 2013, CenturyLink requested additional numbering resources from NeuStar for the Winter Garden exchange. (See Attachment 1 which was filed under Claim of Confidentiality with the Commission Clerk's Office.) Specifically, in order to meet the telephone number needs of one of its customers, CenturyLink requested a thousands block that begins with the number "6" in the Winter Garden (WNGRFLXADS0) wire center. CenturyLink cannot currently meet this request given the inventory of numbers available at this time in this switch.

6. At the time of the code request, the Winter Garden exchange had a Months-to-Exhaust (MTE) of much longer than six (6) months and a utilization of 76.5%. There is no unassigned thousands block that will meet the request of this customer in this switch.

7. On April 16, 2013, NeuStar denied CenturyLink's request for additional numbering resources because CenturyLink did not meet the MTE criteria, notwithstanding the fact that CenturyLink's Winter Garden switch is at 76.5% and does not have an available block to meet the customer's requirements. (See Attachment 1 which was filed under Claim of Confidentiality with the Commission Clerk's Office.)

8. CenturyLink's request for additional numbering resources to meet this requirement in the Winter Garden Exchange would not materially impact exhaustion of available numbers in the 407 area code.

9. As discussed above, both the FCC Order and INC guidelines provided that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 11.1(c).

10. Under earlier 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 and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.

11. CenturyLink's inability to provide the customer with the requested block of numbers prevents CenturyLink from providing the quality of service this customer desires and expects.

12. The Commission has previously received similar requests from numerous carriers, both ILECs and CLECs in which the carriers have asked the PSC to overrule a decision of NANPA and NeuStar. The Commission has granted these requests.

13. CenturyLink requests that the Commission reverse NeuStar's decision to withhold numbering resources from CenturyLink on the following grounds:


- (a.) NeuStar's denial of numbering resources to CenturyLink interferes with CenturyLink's ability to service its customers within the State of Florida.
- (b.) As a result of NeuStar's denial of CenturyLink's request for additional numbering resources, CenturyLink will be unable to provide telecommunications services to its customers.

WHEREFORE, CenturyLink requests:

1. The Commission review the decision of NeuStar to deny CenturyLink's request for additional numbering resources for the Winter Garden exchange, and

2. The Commission directs NeuStar to provide the requested numbering resources for the Winter Garden exchange as discussed above.

Respectfully submitted this 17th day of April, 2013.


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ATTACHMENT 1

**FILED UNDER CLAIM OF
CONFIDENTIALITY
PURSUANT TO SECTION
364.183(1), FLORIDA
STATUTES.**