



at&t

Tracy W. Hatch
General Attorney

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (850) 577-5508
th9467@att.com

RECEIVED-FPSC
13 MAY 24, PM 4:38
COMMISSION
CLERK

May 24, 2013

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

Re: Docket No.: 130152-7A
**Petition for Expedited Review of Growth Code Denials by the
Number Pooling Administrator for the Perrine exchange**

Dear Ms. Cole:

Enclosed is an original and seven copies of AT&T Corp'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
Gregory R. Follensbee
Suzanne L. Montgomery

DOCUMENT NUMBER-DATE

02901 MAY 24 13

FPSC-COMMISSION CLERK

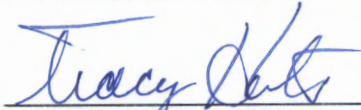
CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth
Code Denials by the Number Pooling Administrator
for the Perrine exchange

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

First Class U.S. Mail this 24th day of May, 2013 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 Perrine exchange)
_____)

Docket No. 130152-JA
Filed: May 24, 2013

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

AT&T Corp (“AT&T”), 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’s request for additional numbering resources in the Tallahassee exchange. In support of this petition, AT&T states:

PARTIES

1. AT&T is a corporation organized and formed under the laws of the State of New York and a competitive local exchange company (“CLEC”) regulated by the Commission and authorized to provide local exchange 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
02901 MAY 24 2013
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 Perrine exchange consists of one switching entity that utilize numbering resources: Main (MIAMFLACCMD).

5. On May 7, 2013, AT&T requested additional numbering resources from NeuStar for the Main (MIAMFLACCMD) switch. See Attachments 1. Specifically, AT&T requested a block to meet the request of a specific customer for 1,000 consecutive numbers. The format of the block needs to be in the format of NPA-NXX-2XXX, 7XXX, or 8XXX.

6. At the time of the code request, the Perrine exchange had a MTE of 2.24 and a utilization of 58.7%.

7. On May 7, 2013, NeuStar's denied AT&T's request for additional numbering resources because AT&T had not met the utilization based criteria, notwithstanding the fact that AT&T 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 or 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 requests that the Commission reverse NeuStar's decision to withhold numbering resources from AT&T on the following grounds:

(a) NeuStar's denial of numbering resources to AT&T 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's request for additional numbering resources, AT&T will be unable to provide telecommunications services to its customers as required under Florida law.

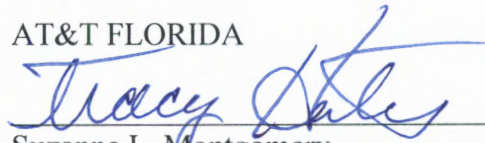
WHEREFORE, AT&T requests:

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

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

Respectfully submitted this 24th day of May, 2013.

AT&T FLORIDA



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

1081175

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 305-PERRINE-FL-630789
Individual Block Request

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: AT&T LOCAL
Headquarters Address: One AT&T Way
City, State, Zip: [REDACTED]
Contact Name: [REDACTED]
Contact Address: One AT&T Way
City, State, Zip: [REDACTED]
Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]@att.com

Pooling Administrator: ii

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 LRN needed

NPA: 305 LATA: 460 OCN: ^{iv} 7421 Parent Company's OCN 7421

Number of Thousands-Blocks Requested : 1

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

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

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 05/07/2013

Requested Block Effective Date: ^{viii} 06/07/2013

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 : CAP OR CLEC (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____

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 ^{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.



Signature of Block Applicant

Manager-Code 05/07/2013
Administration

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 CLI™ tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be



From: dara.flowers@neustar.biz
Sent: Tuesday, May 07, 2013 1:33 PM
To: [REDACTED]
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 305-PERRINE-FL-630789

Pooling Administration System

Dated 07-May-2013

November 21, 2003
 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
 TBPAG Part 3

Tracking Number : 305-PERRINE-FL-630789

Date of Application: 05/07/2013 Effective Date: _____
 Date of Receipt: 05/07/2013 Date of Response: 05/07/2013

Service Provider Name: AT&T LOCAL
 (Telcordia TM LERG TM Routing Guide) OCN: 7421
 Parent Company OCN: 7421

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

MIAMFLACCMD

Rate Center:

PERRINE

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 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:

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.)



Review Forms Window

Click on the hyperlinks to view individual forms.

[Part 1A](#) | [Appendix 3](#) | [Part 1B - 1](#)

K-Block New Request - Appendix 3

Month: 03/2013 | Day: 30 | OCN: 7421 | AOCN: All | RC: PERRINE | RC State: FL | NPA: All | CLI: All

NPA-NXX-X(s) included in growth calculation: [REDACTED] [Details](#)

TNs Available for Assignment: [REDACTED]

TNs Assigned: [REDACTED]

Total TNs: [REDACTED]

Quantity of numbers activated in the past 90 days and excluded from Utilization calculation: [REDACTED] [Details](#)

Excluded Assigned: [REDACTED]

Growth History - Previous 6 Months					
Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Forecast - Next 12 Months					
Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

MTE Range Used: [REDACTED]

Average Monthly Forecast: [REDACTED]

MTE: [REDACTED] (Threshold MTE: 6)

Utilization Level: [REDACTED] (Utilization Threshold: 75%)

Explanation:

[Print](#) [Close](#)

REDACTED

**Perrine
Utilization Summary
Report**

Attachment 2

Customer Information

